



Control Union Certifications B.V. Evaluation of BIFESA S.L. Compliance with the SBP Framework: Public Summary Report

First Surveillance Audit

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Completed in accordance with the CB Public Summary Report Template Version 1.4

*For further information on the SBP Framework and to view the full set of documentation see
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1 Overview

CB Name and contact: Control Union Certifications; Meeuwenlaan 4-6; P.O.Box 161, 8000AD Zwolle, Netherlands. certifications@controlunion.com

Primary contact for SBP: Robin Rosendahl – rrosendahl@controlunion.com

Current report completion date: 22/Jan/2021

Report authors: Lennart Holm

Name of the Company: BIFESA S.L.
Calle Ricardo Velázquez 11-1º Huelva, 21003
Huelva, Spain

Company contact for SBP: Oliver Camacho
CALLE RICARDO VELÁZQUEZ 11-1º HUELVA, 21003 HUELVA, Spain
Tel: +34959250254 Mob: +34626570893
E-mail: administracion@bifesa.com

Certified Supply Base: Huelva, Seville and Cadiz provinces of the Andalusia Autonomous Community, Spain

SBP Certificate Code: SBP-06-29

Date of certificate issue: 02/Aug/2019

Date of certificate expiry: 01/Aug/2024

This report relates to the First Surveillance Audit

2 Scope of the evaluation and SBP certificate

The certificate scope covers the chipping activity in the forest and office in Huelva, Spain. The BP purchase the Feedstock in the forest already chipped logs, in such case the BP outsources the chipping activity in the forest. Feedstock used in the biomass production originates from Spain. A Supply Base Evaluation is included in the scope of the evaluation.

The following SBP standards are applicable and form the scope of the evaluation and thus, the SBP certificate: Standard 1, Standard 2, Standard 4 and Standard 5. All material is either SBP compliant through standard 1 SBE or PEFC certified or FSC certified materials. Control system used to define the output claims is physical separation.

3 Specific objective

The specific objective of this evaluation was to confirm 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 the evaluation covered:

- Review of the BP's management procedures;
- Review of the production processes, production site visit;
- Review of PEFC and FSC system control points and an analysis of the existing PEFC and FSC CoC system;
- Interviews with responsible staff;
- Review of the records, calculations and conversion coefficients; and
- GHG data collection analysis.
- SAR and profiling data collection analysis.
- "Instruction Document 5D: Dynamic Batch Sustainability Data v1.1 evaluation"

4 SBP Standards utilised

4.1 SBP Standards utilised

Please select all SBP Standards used during this evaluation. All Standards can be accessed and downloaded from <https://sbp-cert.org/documents/standards-documents/standards>

- ☒ SBP Framework Standard 1: Feedstock Compliance Standard (Version 1.0, 26 March 2015)
- ☒ SBP Framework Standard 2: Verification of SBP-compliant Feedstock (Version 1.0, 26 March 2015)
- ☒ SBP Framework Standard 4: Chain of Custody (Version 1.0, 26 March 2015)
- ☒ SBP Framework Standard 5: Collection and Communication of Data (Version 1.0, 26 March 2015)

4.2 SBP-endorsed Regional Risk Assessment

Not applicable

5 Description of Company, Supply Base and Forest Management

5.1 Description of Company

Bifesa SL is a biomass producer located in the city of Huelva and performing harvesting operations within the Huelva, Seville and Cadiz provinces of the Andalucía Autonomous Community.

Bifesa SL is a 30 years old, vertically integrated, company specialised in the production and delivery of wood products for different users: roundwood for pulpmills, wood chips for biofuel producers. It has multidisciplinary staff of around 80 people and 7 – 8 permanent harvesting teams. The harvesting teams consist of 2 to 8 people, which are mainly performing harvesting manually, but sometimes by means of a harvester. Other machinery used in forest operations are: forwarders, skidders, forestry tractors and chipping machines.

Bifesa SL has a team of engineers, responsible for the technical processes. They organize the harvesting, chipping and transportation processes. Bifesa SL is mainly engaged in thinnings, prunnings, sanitary cuttings, selective fellings and final cuts of mature trees, as well as fire protection cuttings, and reforestation. In total, it harvests more than 50 000 tons of wood per year, of which around 30 000 tons is for biomass production. Regionally, Bifesa SL is considered a medium sized enterprise. Bifesa SL is the second biggest company in the region. The biggest forest company in the region is producing biomass for its own energy plant.

Bifesa is ISO 9001, ISO 14001 and OHSAS 18001 certified and these systems includes well developed mitigation measures that are applicable to the scope of SBP certification as well. For instance, waste management system was developed in line with ISO 14001, complaint management was established within ISO 9001 and, as mentioned above, health and safety control system works effectively due to OHSAS 18001 certification system implemented.

5.2 Description of Company's Supply Base

The Supply Base includes the regions of Huelva, Seville and Cadiz provinces of the Andalucía Autonomous Community, Spain.

In the Supply Base there are Mediterranean conifer forests (in the south-central region) with a clear presence of eucalyptus plantations. Other tree species within the Supply Base are native:

- Umbrella pine - *Pinus pinea*;
- Maritime pine - *Pinus pinaster*;
- White eucalyptus - *Eucalyptus globulus*;
- Red eucalyptus - *Eucalyptus rostrate*;
- Holm oak - *Quercus ilex*;
- Cork oak - *Quercus suber*;

- Sweet chestnut - *Castanea sativa*.

Introduced species, such as eucalyptus (*Eucalyptus spp.*) are allowed in short rotation forestry, but on a very limited scale.

For biomass production, Bifesa SL is mainly working in conifer forests, mostly formed by Umbrella pine and Maritime pine, and in a very limited extend – in eucalyptus plantations.

Next table indicates the forest area, canopy-covered forest area, coniferous forest area and Umbrella pine forest area for Huelva, Seville and Cadiz province.

Supply Base	Total forest area (ha)	Coniferous forest area (ha)	Pinus pinea forest area (ha)
Huelva province	787.737	149.670	88.467
Cádiz province	373.670	70.997	41.964
Seville province	422.001	80.180	47.392
Total	1583.408	300.847	177.823

73% of the forest area in the Supply Base (Huelva province) is private property. The prevailing private forest property size of the Supply Base is around 60 ha, but the total of private forest areas is larger than the area of public forests. Public forests are larger in scale, but much less frequent.

The dominant use of the land is forestry. Land use is characterized by a small number of large properties and a great number of small owners.

From a socio-economic point of view, people nowadays do not depend on forests. The forest industry is also not developed well within the regions of the Supply Base, in comparison to the rest of Spain. This is mostly due to the complex macrorelief (hills, slopes and mountains), which makes forestry operations very difficult.

The proportion of wood used for biomass production within the Supply Base is relatively the same compared to the other main variants of using the wood. Umbrella pine trunks (40% per tree) and eucalyptus trunks (75% per tree) are used for pulp and paper production. Only branches are used for biomass production (60% of pine trees, and 25% of eucalyptus trees). The production of wood pallets and boxes for the agricultural sector is another important final use of pine wood in the Huelva province. There are quite some sawmills in the region using sawnwood as well. However, other industries can hardly use twig wood, which, however, needs to be removed from forest lots because of the risk of forest fire. The only viable use for this raw material is the production of biomass.

Nowadays, most of the pine forests in the Supply Base area are abandoned and unmanaged. This is due to the low profitability of the forests, these forests are capitalized, divided by the slopes, which normally are difficult to enter with machinery. The final product (wood) is of low quality and the forest industry produces products with little added value.

SBP-compliant primary feedstock is the only product group that Bifesa SL has, within the scope of SBP certification. Bifesa SL prioritizes acquiring wood from forests harvested by its own harvesting teams. It will be able to take exhaustive control of all the SBP indicators.

The tree species harvested for SBP biomass production include:

- Umbrella pine - *Pinus pinea* – 89%;
- Maritime pine - *Pinus pinaster* – 1%;
- White eucalyptus - *Eucalyptus globulus* – 5%;
- Red eucalyptus - *Eucalyptus rostrata* – 5%;

Bifesa SL does not harvest, or purchase any tree species included in the CITES or IUCN lists. The CITES list does not include any tree species from Spain. The IUCN list includes Common Ash (*Fraxinus excelsior*) under “Near Threatened” status and Horse Chestnut (*Aesculus hippocastanum*) as “Vulnerable”.

5.3 Detailed description of Supply Base

Supply Base

- | | |
|-------------------------------------|---|
| a. Total Supply Base area (ha): | 1,583,408 ha (Cadiz: 373,670 ha + Huelva 787,737 ha + Sevilla 422,001 ha) |
| b. Tenure by type (ha): | Privately owned: 1,221,160 ha
Public: 362 248 ha |
| c. Forest by type (ha): | 1,583,408 ha temperate; |
| d. Forest by management type (ha): | 394,149 ha plantation / 187,070 ha managed natural / 1,002,189 ha natural |
| e. Certified forest by scheme (ha): | FSC: 12,891.13 ha
PEFC: 13,084.1 ha |

Feedstock

- | | |
|----|--|
| a. | Total volume of Feedstock: 23 855,84 tonnes |
| b. | Volume of primary feedstock: 23 855,84 tonnes |
| c. | Percentage of primary feedstock categories: <ul style="list-style-type: none"> • Certified to an SBP-approved Forest Management Scheme: 1 470,62 tons; • Not certified to an SBP-approved Forest Management Scheme: 22 385,22 tons. |
| d. | List all species in primary feedstock, including scientific name <ul style="list-style-type: none"> • Umbrella pine (<i>Pinus pinea</i>) • Maritime pine (<i>Pinus pinaster</i>) • White eucalyptus (<i>Eucalyptus globulus</i>) • Red eucalyptus (<i>Eucalyptus rostrata</i>) |
| e. | No feedstock from primary forest |
| f. | List percentage of primary feedstock from primary forest (j), by the following categories. Subdivide by SBP-approved Forest Management Schemes: N/A |

- g. Volume of secondary feedstock: **N/A**
- h. No tertiary feedstock.

5.4 Chain of Custody system

The BP holds PEFC and FSC Chain of Custody certificate with physical separation method or transference system in the scope. All inputs are received as 100% PEFC certified or 100% FSC certified.

Material not included in the certification scope is sourced and managed physically segregated. The CoC scope covers the purchase of roundwood in the forest, chipping and transport of biomass to be sold in the Spanish ports detailed in the scope.

The BP purchase biomass mainly is purchased in logs, the biomass producer outsources the chipping process in the forest.

Purchased documentation (harvesting permit, origin, specie, etc.) is reviewed and validated by the BP prior to start the harvesting activities by Pedro Montero. Once the material is received in the harbours, Pedro Montero double check all documentation from the supplier and the harbour to validate it. The biomass is stored in each harbour and controlled by an outsourced logistic company there.

6 Evaluation process

6.1 Timing of evaluation activities

The audit occurred between May 22 and October 1, 2020 conducted by Lead Auditor Lennart Holm. This report is the result of the findings of a certification evaluation carried out by an independent lead auditor representing Control Union Certifications. The purpose of the assessment was to evaluate the compliance of the client with respect to the standards used within the scope of the certificate.

Activity	Site & Auditor	Date/Time
Friday 22/05/2020		
Opening meeting	Skype call to the Bifesa office (LH)	09:00-09:15
Agreement on Scope	(LH)	09:15-09:20
Supply Base report	(LH)	09:20-10:00
Supply Base Evaluation	(LH)	10:00-11:00
Suppliers and incoming raw material registration	(LH)	10:00-11:15
Chain of Custody registrations and output claims	(LH)	11:15-11:45
Health and safety, and training	(LH)	11:45-12:15
Logo/trademark use	(LH)	12:15-12:30
Lunch break		12:30-13:30
GHG data registrations	(LH)	13:30-17:30
Day's closing meeting	(LH)	17:30-18:00
30.09.2020 & 01.10.2020		
Day's Opening meeting	Bifesa SL (LH)	09:00-09:15
Field verification of SBE, including visit to suppliers and chipping operations 1. La Solana de Gil Marquez	Sites: La Solana de Gil Marquez; Ordenados de Moguer lote 1; coto	09:15-17:00

2.Ordenados de Moguer lote 1	Mazagón lote 8 and coto Mazagón lote 9 (LH)	
Report writing	Bifesa SL (LH)	17:00-17:30
Closing Meeting	(LH)	17:30-18:00

1. Names and affiliations of people interviewed	
Name:	Affiliation:
Oliver Camocho Dvilés	Tecnic Director
Pedro Garcia Montero	SBP Manager
António David Rebolvo	Administrative Staff
Juan Luis Tosacno	Tecnic Supervisor
Diego Velazquez Garcia	Chainsaw Operator
Diego Velazquez Colon	Chainsaw Operator
José Lorenzo	Chainsaw Operator
Eduardo Domingues	Chainsaw Operator
Pedro Dominguez Garcia	Forwarder Operator
Manual Garcia Aviles	Truck driver
Rafael Gabarro Salazar	Worker of Department de Ambient Andalusia

6.2 Description of evaluation activities

The remote audit started with an opening meeting on May 22 at 9:00 with the attendance from the Head of Biomass Department, the main responsible person for SBP, FSC and PEFC CoC procedures and Bifesa's external consultant.

The BP takes physical possession and has no production facilities, chipping takes place in the forest and the material goes directly from the forest to the harbour.

The audit consisted of review of procedures, control system, feedstock reception. Interviews were conducted with all staff relevant to the critical control points and key responsibilities in relation to the Biomass production (in forest) and sales of the certified products were conducted during the on-site audit in September. The audit also included extensive documents review and check of calculations in regard to the GHG emission data reported by the BP.

The audit was concluded with a closing meeting with attendance by the Head of Biomass Department. During the closing meeting the auditor presented the conclusions of the audit, including found non-conformities.

The supporting documents provided sufficient evidence to close the two observations identified during the initial audit.

2. Critical control points, summary	
<i>Identified CCP</i>	<i>Evaluation CCP</i>
Sourcing and input check	Check prior to sending the material by supplier and check upon request
Reception and storage	Reception and storage of material based on credit control system.
Volume control	Credit Control system
Labelling	No trademark use
Invoicing and shipping	Certified materials are either FSC, PEFC or SBP Compliant

6.3 Process for consultation with stakeholders

The stakeholder consultation was started by Bifesa on the 22nd of March, 2019 by sending direct email to different stakeholder categories: state institutions, local NGOs, authorities, government bodies, forest owners associations, academic and research institutions.

The stakeholder notification letter is in the approved format of Control Union Certification.

The stakeholder consultation was send 30 days before starting the on site audit.

No comments were received.

7 Results

7.1 Main strengths and weaknesses

The main strength of the BP lies within relatively simple production and its use of primary material which is all received as PEFC Certified, FSC Certified and SBP Compliant. The Supply Base Evaluation is based on the strong control system by Spanish public or autonomous organizations. The BP only works with one customer (this number can be increased in the future, but the BP doesn't expect to work with a big number of customers) and the chain of custody downstream is short, thus access to necessary information regarding the forest management unit of origin can be easily confirmed. For weaknesses, please see the Observations in Section 10 of this report

7.2 Rigour of Supply Base Evaluation

BIFESA 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 part of Andalusia (Huelva, Cadiz and Sevilla), Spain. The SBE was developed in joint efforts between internal personnel and a qualified consultant, using credible data sources. BIFESA existing 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 1 Indicator which was designated as specified risk. BIFESA has developed additional controls and mitigation measures to manage this risk. 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 email. The risk mitigation measures has been designed and implemented planned in cooperation with acknowledged experts and external consultants in relevant fields.

The supply base evaluation was a rigour process with some gaps identified (see observation part to this report).

7.3 Collection and Communication of Data

All energy and fuel use documentation for chipping and transport has been provided by the supplier or outsourcing companies in the forest.

7.4 Competency of involved personnel

Internal staff members are involved in the SBP system management and implementation. All interviewed responsible staff demonstrated awareness of their responsibilities within SBP system. The key responsible person for developing the SBE system is an external consultant with experience in producing SBP systems.

All involved personnel, including responsible staff at suppliers and sub-suppliers have demonstrated good knowledge in relevant fields (safety and health measures at work) 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 primary 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 audit.

7.5 Stakeholder feedback

See 6.3 above

7.6 Preconditions

N/A, no preconditions

8 Review of Company's Risk Assessments

Describe how the Certification Body assessed risk for the Indicators. Summarise the CB's final risk ratings in Table 1, together with the Company's final risk ratings. Default for each indicator is 'Low', click on the rating to change. Note: this summary should show the risk ratings before AND after the SVP has been performed and after any mitigation measures have been implemented.

Control Union assessed the risk for each Indicator using the guidance in Section 11 of SBP Framework Standard 2: Verification of SBP-compliant Feedstock.

The CB has concluded, that Bifesa has misclassified indicators 2.2.1; 2.2.3; 2.2.5; 2.2.7; 2.2.8 and 2.9.1 as "low" risk. Initially, the reviewed evidence did not indicate a low risk. After evaluation, Bifesa has mitigation measures (see 9) in place for all specified risks.

Table 1. Final risk ratings of Indicators as determined BEFORE the SVP and any mitigation measures.

Indicator	Risk rating (Low or Specified)	
	Producer	CB
1.1.1	Low	Low
1.1.2	Low	Low
1.1.3	Low	Low
1.2.1	Low	Low
1.3.1	Low	Low
1.4.1	Low	Low
1.5.1	Low	Low
1.6.1	Low	Low
2.1.1	Low	Low
2.1.2	Low	Low
2.1.3	Low	Low
2.2.1	Low	Specified
2.2.2	Specified	Specified
2.2.3	Low	Specified
2.2.4	Low	Low
2.2.5	Low	Specified
2.2.6	Low	Low
2.2.7	Low	Specified
2.2.8	Low	Specified
2.2.9	Low	Low
2.3.1	Low	Low

Indicator	Risk rating (Low or Specified)	
	Producer	CB
2.3.3	Low	Low
2.4.1	Low	Low
2.4.2	Specified	Specified
2.4.3	Low	Low
2.5.1	Low	Low
2.5.2	Low	Low
2.6.1	Low	Low
2.7.1	Low	Low
2.7.2	Low	Low
2.7.3	Low	Low
2.7.4	Low	Low
2.7.5	Low	Low
2.8.1	Specified	Specified
2.9.1	Low	Specified
2.9.2	Low	Low
2.10.1	Low	Low

2.3.2	Low	Low
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Table 2. Final risk ratings of Indicators as determined AFTER the SVP and any mitigation measures.

Indicator	Risk rating (Low or Specified)	
	Producer	CB
1.1.1	Low	Low
1.1.2	Low	Low
1.1.3	Low	Low
1.2.1	Low	Low
1.3.1	Low	Low
1.4.1	Low	Low
1.5.1	Low	Low
1.6.1	Low	Low
2.1.1	Low	Low
2.1.2	Low	Low
2.1.3	Low	Low
2.2.1	Low	Low
2.2.2	Low	Low
2.2.3	Low	Low
2.2.4	Low	Low
2.2.5	Low	Low
2.2.6	Low	Low
2.2.7	Low	Low
2.2.8	Low	Low
2.2.9	Low	Low
2.3.1	Low	Low
2.3.2	Low	Low

Indicator	Risk rating (Low or Specified)	
	Producer	CB
2.3.3	Low	Low
2.4.1	Low	Low
2.4.2	Low	Low
2.4.3	Low	Low
2.5.1	Low	Low
2.5.2	Low	Low
2.6.1	Low	Low
2.7.1	Low	Low
2.7.2	Low	Low
2.7.3	Low	Low
2.7.4	Low	Low
2.7.5	Low	Low
2.8.1	Low	Low
2.9.1	Low	Low
2.9.2	Low	Low
2.10.1	Low	Low

9 Review of Company's mitigation measures

The mitigation measures per indicator are given in the table below. Subsequently, information is given on the management system, implementing the mitigation measures regarding the sustainability indicators.

2.2.1	The BP has implemented appropriate control systems and procedures to verify that feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them.
Mitigation measures	Bifesa has implemented a checking system and records are kept in Annex 4 of the Handbook (Monitoring activity in forest sites).
2.2.2	The BP has implemented appropriate control systems and procedures for verifying that feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b).
Mitigation measures	Only thinnings are performed in forest sites. Best forest management practices are always applied; When harvesting eucalyptus on slopes these mitigation measures are applied: ○ Work in the contour lines avoiding maximal slopes; ○ Cord off the residues in contour lines to reduce the streams produced by rain; ○ Avoid the use of machines in the steepest areas; Soil depletion in eucalyptus stands is counteracted applying the following measures: ○ Stumps left in the soil; ○ Fertilization; ○ Planting of improved clones which require less nutrients;
2.2.3	The BP has implemented appropriate control systems and procedures to ensure that key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).
Mitigation measures	Manual of Good Environmental and Forestry Practices; technical personnel of Bifesa are responsible for collecting information and ensuring compliance, performing monitoring operations (Annex 4, Handbook).
2.2.5	The BP has implemented appropriate control systems and procedures for verifying that the process of residue removal minimises harm to ecosystems.
Mitigation measures	Monitoring operations (annex 4, Handbook) are carried out by Bifesa during forest harvesting by professional personnel to ensure that minimal harm affects the ecosystem during residual removal. On the other side Bifesa has mandatory instruction by the Forest Service to remove residuals in order to prevent forest fires, which endanger the survive of all ecosystem in a hot region such as Andalusia.
2.2.7	The BP has implemented appropriate control systems and procedures for verifying that air quality is not adversely affected by forest management activities.

Mitigation measures	Bifesa holds the ISO 9001, ISO 14001 and OSHAS 18001 certifications, and has an environmental policy with procedures implemented to minimise the emission of atmospheric pollutants. In forestry works three main sources of atmospheric pollution have been identified: 1) Dust. To minimise the amount of dust produced by the works, it is necessary to proceed in moderation in those places where dust is generated. 2) Combustion gases from machinery and vehicles. To minimise the emission of gasses, the engines must be kept perfectly maintained and switched off when not in use. 3) Incineration of forest waste. Forest waste management methods such as shredding are used. Bifesa also has a system implemented with the following elements in order to minimise the possible impacts of the operations: • Manual of good environmental practices, recommended conduct for its own workers and workers from subcontracted companies; • Manual of operating practices of the occupational risk prevention system; • Code of good environmental practices in Sustainable Forest Management. When Bifesa buys chips from other suppliers, under contract it obliges the supplier to provide its Manual of Good Environmental and Forestry Practices and to follow it and implement it in the work to be carried out. The technical personnel of Bifesa are responsible for collecting this information and ensuring compliance.
2.2.8	The BP has implemented appropriate control systems and procedures for verifying that there is controlled and appropriate use of chemicals, and that Integrated pest management (IPM) is implemented wherever possible in forest management activities (CPET S5c).
Mitigation measures	Bifesa holds the ISO 9001, ISO 14001 and OSHAS 18001 certifications and has an environmental policy with procedures implemented to minimise environmental impact. Bifesa has a system implemented with the following elements in order to minimize possible impacts: • Manual of good environmental practices, recommended conduct for its own workers and workers from subcontracted companies • Manual of operating practices of the occupational risk prevention system • Code of good environmental practices in Sustainable Forest Management When Bifesa buys chips from other suppliers, under contract it obliges the supplier to provide its Manual of Good Environmental and Forestry Practices and to follow it and implement it in the work to be carried out. The technical personnel of Bifesa are responsible for collecting this information and ensuring compliance. Under the present legislation (Royal Decree 1311/2012, of 14 September) Bifesa follows (and does not approve) inefficient use of pesticides against pine processionary moth (<i>Thaumetopoea pityocampa</i>). Aerial spraying of pesticides is forbidden, but in special cases can still be approved by the government. There has not been aerial spraying in the forest areas of importance to Bifesa in the past. In case this inefficient method is used in some forests in the future, the feedstock coming from these forest areas would be excluded
2.4.2	The BP has implemented appropriate control systems and procedures for verifying that natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b).
Mitigation measures	Fire mitigation measures:

Two periods must distinguish:

1st - Fall, Winter and Spring (Low fire risk)

- The fire measures applied by Bifesa during this period are those required by legislation, that is, fire extinguishers in vehicles and machines, as well as having a telephone to call INFOCA in case of a fortuitous fire.
- As in all the mountains there is a cutting permit, automatically the local "Rangers" authorities know the actions in the area and take some measures that are explained to the workers for each cutting area, with extraordinary risks such as scrubland dry or similar
- However, Bifesa, through its manual of good forestry practices, takes the following extraordinary measures:
 - After the work day the area is left clean of waste such as papers, oils, cans, etc.
 - When refuelling oil and diesel, chainsaws are always made in the same area enabled for this purpose using absorbent paper or similar so that no fuel falls in the forest area.
 - Cutting works are always done from the perimeter of the forest towards the interior.

2nd - In Summer (Fire risk)

In addition to the measures taken during the rest of the year, there are taken special precautions:

- The administration itself limits forestry work from June 15 to September 1, since historically it is the period with the greatest fire risk (Although sometimes this period can be extended until November 1 according to the weather and administration criteria)
- Following the "Resolution of June 19, 2018 of the Director General of Management of the Natural Environment and Protected Areas, which approves preventive measures for the realization of forest work and exploitation in times of high danger of forest fires", INFOCA must be notified 1 week in advance that work will continue in the mountains and for this purpose, a notification is presented to INFOCA for the forest in which Bifesa is going to work.
- The works to be carried out are cutting, unloading, loading, chipping and transport of the chips.
- Those works notified to INFOCA again have new limitations following the instructions mentioned in the resolution of June 19, 2018 of section 2, and will depend on the weather forecast for the day and the next day, for this purpose Bifesa consults the page of the State Meteorological Agency (AEMET) in its fire risk section:
<http://www.aemet.es/es/eltiempo/prediccion/incendios>
- This page shows the map of Spain with different colors and offers the prediction of fire risk for the current day as well as for the next day. The colors that appear are: cyan, green, yellow, orange and red:
 - Cyan (Low risk): authorized work can be done following the summer restrictions;
 - Green (Moderate risk): authorized work can be done following the summer restrictions;
 - Yellow (High risk): You can perform cutting, chipping and transport work;

	○ Orange (Very high risk): Only works in loader area can be done (shearing, chipping, loading timber into trucks and transporting timber); ○ Red (Extreme risk): No work is allowed. Forest guards are pending and informed by the INFOCA of the forests in which they are working, so due to the risk of fires they are supervising the cuts in these areas and carry a map to know the daily risk of fires. If work is being carried out that, even if authorized, does not respect the indications of the AEMET, those works are immediately paralyzed and the company is fined. If the prediction changes, it is possible to resume the work and check the AEMET page daily in the summer months. In addition to these measures for these months of work Bifesa does the following: • The cutting works will always be carried out in the opposite direction to the favourable winds. • Every work crew is accompanied by a forest fire prevention / extinction team, consisting of: ○ Vehicle equipped with a 500 liter water tank with a motor pump ○ 16 liter fire extinguisher backpack. (per worker in the bush) ○ Water tank of 25 litres extra. (per worker in the bush) ○ Batefuegos. (per worker in the bush) ○ Responsible for firefighting, a person who is responsible for monitoring during work as well as up to 1 hour after completion of work. Example: if 6 people are going to work cutting wood there will be: ○ The vehicle with a 500 litres water tank (actual capacity 1000 litres); ○ 6 fire extinguishers with 16 litres of water; ○ 6 extra water tanks of 25 litres (150 litres); ○ 6 firefighters; Responsible for firefighting with their respective equipment
2.8.1	The BP has implemented appropriate control systems and procedures for verifying that appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12).
Mitigation measures	Bifesa implements the following mitigation measures to reduce this risk: Bifesa is OHSAS 18001 certified company. Ensure that all necessary documentation related to health, safety and social security are in place for every worker within own company: • Training records on health and safety risks; • Record of delivery of PPE to all workers. Provides obligational training for own forest workers; Provide a copy of best forest management practices to the forest workers; Provide all necessary PPE and protective equipment to every forest team; Supervise own harvesting operations for fulfilment of the health and safety rules. In case of violations, additional sanctions are implemented. If not possible to ensure that health and safety rules are fulfilled for the harvesting operation in the Supply Base, rejection of SBP-compliant claim for the feedstock coming from such operations.

2.9.1	Feedstock is not sourced from areas that had high carbon stocks in January 2008 and no longer have those high carbon stocks.
Mitigation measures	Bifesa performs: - only thinnings in Pinus stands approved by the state authorities which regulates the questions of carbon sequestration in the forest. Thinnings “from above” are not performed by the company. Besides that, thinnings are done when no land use change is planned. The land use (forest) remains the same; - final cycle cuts in eucalyptus stands that can be PEFC/FSC (no further action required) or not (see below). If the eucalyptus stands are not PEFC/FSC, Bifesa will only consider woodchips as SBP compliant biomass when in the lot happens as follows (either): 1 - the stumps are left in the soil so that a new eucalyptus cycle begins (out of 3 or 4 cycles), which is applicable to plantations under 25 years old. These plants, as the stump is not removed, can stock carbon; 2 – the cut affects a selection of shoots: from the same eucalyptus stump several suckers come out and from these the worst suckers are eliminated, leaving more nutrients for the best ones which grow a lot; the cut rods are used for biomass; 3- instead of removing stumps, the crushed stumps are left into the soil so that nutrients are supplied to the next crop; 4 – an organic fertilizer is applied after each cut to provide restore nutrients to the soil; 5 – selective cuts are made for fire protection, but the stumps are left in the soil. Anyway there is progressive storage of carbon in the suckers or new plants. Bifesa will not use biomass as SBP-compliant if it's coming from eucalyptus stands where the stumps are removed (final cut of 3 or 4 cycles).

10 Non-conformities and observations

Identify all non-conformities and observations raised/closed during the evaluation (a tabular format below may be used here). Please use as many copies of the table as needed. For each, give details to include at least the following:

- applicable requirement(s)
- grading of the non-conformity (major or minor) or observation with supporting rationale
- timeframe for resolution of the non-conformity
- a statement as to whether the non-conformity is likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks.

NC number 2020-01	NC Grading: Minor
Standard & Requirement:	SBP Std 2:v1.0;
Description of Non-conformance and Related Evidence:	
SBE Annex 1, Indicator 2.2.1: BIFESA base the justification for low risk mainly on compliance on legislation without presenting evidence on the effectiveness or enforcement of the legislation, as well, there is no mentioning on appropriate assessment of impacts, and planning, implementation and monitoring to minimise them, as it relates to ecological, social and cultural values.	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	<i>Click or tap here to enter description provided by Company to close the NC.</i>
Findings for Evaluation of Evidence:	<i>Click or tap here to enter findings for evaluation of evidence by the auditor.</i>
NC Status:	Open

NC number 2020-02	NC Grading: Minor
Standard & Requirement:	<i>Click to enter SBP standard and requirement reference SBP Std 2:v1.0; Click to enter SBP standard and requirement reference</i>
Description of Non-conformance and Related Evidence:	
SBE Annex 1, Indicator 2.2.5 & 2.9.2: Justification of low risk for these indicator is partly as the company states they only carries out thinnings in pine stands, but the SBR and SBE makes references to clear cutting of Eucalyptus as well. Thus, BIFESA has not implemented appropriate control systems and procedures for verifying that the process of residue removal minimises harm to ecosystems..	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date

Evidence Provided by Company to close NC:	<i>Click or tap here to enter description provided by Company to close the NC.</i>
Findings for Evaluation of Evidence:	<i>Click or tap here to enter findings for evaluation of evidence by the auditor.</i>
NC Status:	Open

NC number 2020-03	NC Grading: Minor
Standard & Requirement:	SBP Std 2:v1.0; <i>Click to enter SBP standard and requirement reference</i>
Description of Non-conformance and Related Evidence:	
SBE Annex 1, Indicator 2.2.7 & 2.2.8: BIFESA uses the fact that they are certified to ISO9001, 14001 and 18001 partly as justification for low risk for this indicator. However, if BIFESA feels it is necessary to have these systems in place, it may be that without them the indicator would be specified risk.	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	<i>Click or tap here to enter description provided by Company to close the NC.</i>
Findings for Evaluation of Evidence:	<i>Click or tap here to enter findings for evaluation of evidence by the auditor.</i>
NC Status:	Open

NC number 2020-04	NC Grading: Minor
Standard & Requirement:	SBP Std 2:v1.0; <i>Click to enter SBP standard and requirement reference</i>
Description of Non-conformance and Related Evidence:	
See Annex 1, Indicator 2.8.1: The evidence presented in the SBE for justification of low risk does not respond to the indicator which states "Biomass is not sourced from areas that had high carbon stocks in January 2008 and no longer have those high carbon stocks."	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	<i>Click or tap here to enter description provided by Company to close the NC.</i>
Findings for Evaluation of Evidence:	<i>Click or tap here to enter findings for evaluation of evidence by the auditor.</i>
NC Status:	Open

NC number 2020-05	NC Grading: Minor
Standard & Requirement:	<i>Click to enter SBP standard and requirement reference SBP Std 2:v1.0; Click to enter SBP standard and requirement reference</i>
Description of Non-conformance and Related Evidence:	
Various mistakes and errors in the english version of the SBR. Section 2.1 does not have a description of the profile of adjacent lands. Section 2.5 contain numerical errors in the Feedstock section. Section 5 The monitoring plan for assessing forest operations within the supply base is not described. Section 6 does not describe during what dates the consultation was held. Section 9.1. The description of the mitigation measures differs from those described in the SBE. Section 9.2 does not appropriately describe what the outcomes of the monitoring are. Section 13.3 does not accurately describe changes from last years' SBR	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	<i>Click or tap here to enter description provided by Company to close the NC.</i>
Findings for Evaluation of Evidence:	<i>Click or tap here to enter findings for evaluation of evidence by the auditor.</i>
NC Status:	Open

NC number 2020-06	NC Grading: Minor
Standard & Requirement:	<i>SBP Std 5:v1.0</i>
Description of Non-conformance and Related Evidence:	
BIFESA's handbook incorrectly defines the numerical use of the Pbid AA value.	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	<i>Click or tap here to enter description provided by Company to close the NC.</i>
Findings for Evaluation of Evidence:	<i>Click or tap here to enter findings for evaluation of evidence by the auditor.</i>
NC Status:	Open

11 Certification decision

Based on the auditor's recommendation and the Certification Body's quality review, the following certification decision is taken:

Certification decision:	Certification approved
Certification decision by (name of the person):	Hubert Jurczyszyn
Date of decision:	22/Feb/2021
Other comments:	Decision taken with the delay due to the reasons known to SBP secretariat