



Supply Base Report: Comsa Renovables

Third Surveillance Audit

www.sbp-cert.org



The promise of good biomass



Completed in accordance with the Supply Base Report Template Version 1.5

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

Document history

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1 Overview

Producer name: Comsa Renovables

Producer address: Viriato 47, Planta 2, 08014 Barcelona, Spain

SBP Certificate Code: SBP-08-16

Geographic position: 41.380500, 2.141000

Primary contact: Xavier Melgar Anguera, +34 636 658 565, xavier.melgar@comsa.com

Company website: www.comsa.com

Date report finalised: 15 Aug 2023

Close of last CB audit: 20 Jun 2023

Name of CB: Preferred by Nature OÜ

SBP Standard(s) used: SBP Standard 2: Verification of SBP-compliant Feedstock, SBP Standard 4: Chain of Custody, SBP Standard 5: Collection and Communication of Data Instruction, Instruction Document 5E: Collection and Communication of Energy and Carbon Data 1.5

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: 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	Re-assessment
☐	☐	☐	☒	☐	☐

2 Description of the Supply Base

2.1 General description

Feedstock types: Primary

Includes Supply Base evaluation (SBE): No

Includes REDII: N/A

Includes REDII SBE: N/A

Feedstock origin (countries): Spain

2.2 Description of countries included in the Supply Base

Country: Spain

Area/Region: Cataluña and Aragón

Sub-Scope: N/A

Exclusions: No

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: **PBN-PEFC-COC-058187**. The source regions are Catalunya and Aragón.

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

None of the species harvested and included in the supply base are listed as protected species (CITES or IUCN): *Pinus halepensis* (Pino carrasco); *Pinus nigra* (Pino laricio); *Pinus sylvestris* (Pino silvestre); *Pinus pinaster* (Pino marítimo); *Pinus pinea* (Pino piñonero); *Populus spp* (Chopo); It is not expected the presence of protected species within SBP feedstock as forest works are carried out under the control of public administration forestry agents and require a specific permit that establishes conditions in the event of the appearance of any relevant value.

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 bark	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

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

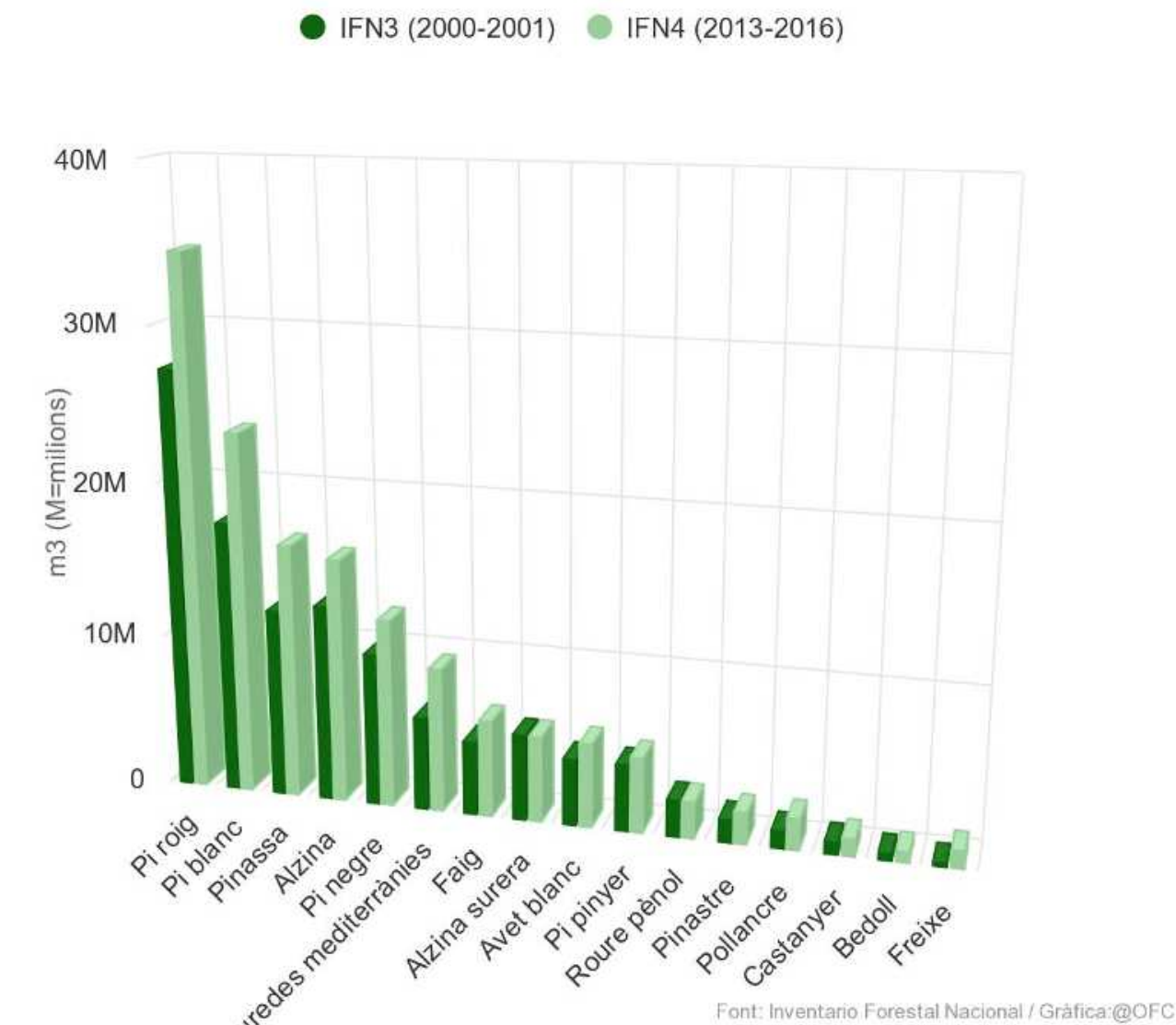
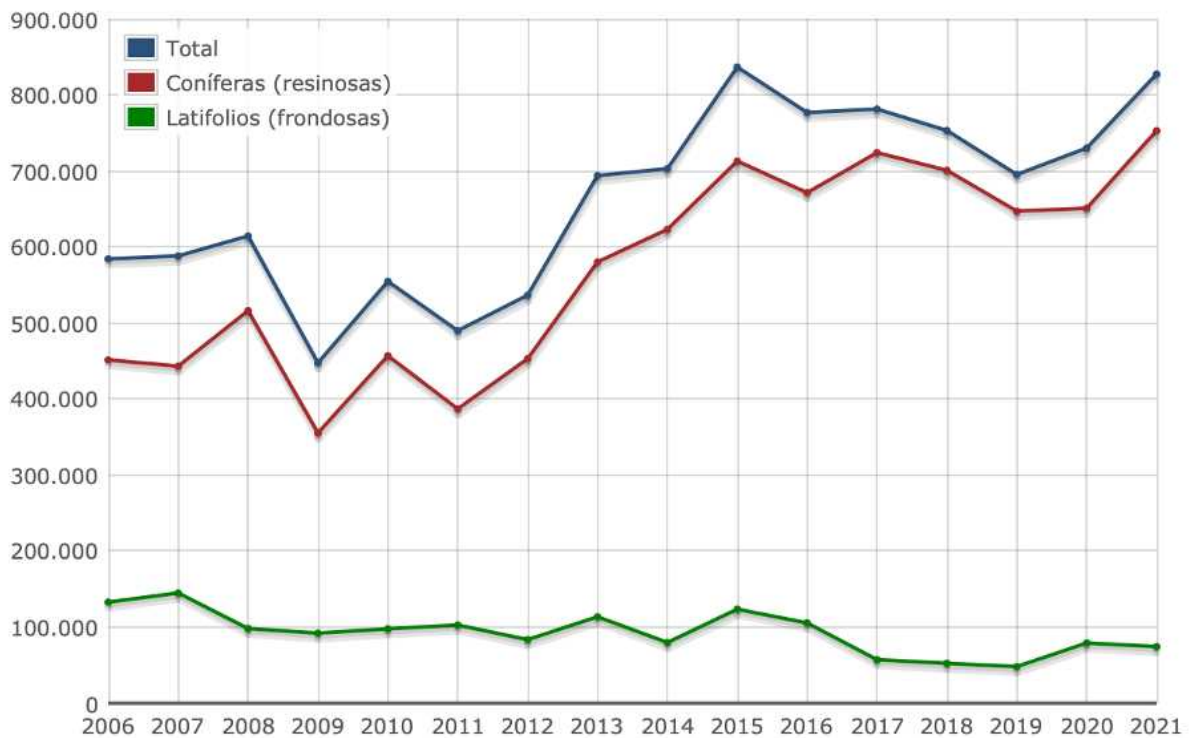


Figure 2: Source: <http://www.observatoriforestal.cat/resum-del-sector/>

Only the 33% of the total amount growing each year is harvested in the Area of Catalunya. These data is 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.

Producción de madera. Por especies. Provincias. Cataluña. Cataluña. 2006-2021



Fuente: Departamento de Acción Climática, Alimentación y Agenda Rural.

Figure 3: Data Source Source: <https://www.idescat.cat/indicadors/?id=aec&n=15441&lang=es>

In Aragón property is mainly private and public, but from local entities, as it is shown in this figure:

Naturaleza y biodiversidad

Recursos forestales

Superficie forestal total, arbolada y desarbolada según titularidad de los montes.

Unidades: Hectáreas.

	Total forestal Aragón	Arbolada Aragón	Desarbolada Aragón
Total	2.608.311	1.577.990	1.030.321
Estado / CC.AA.	87.831	77.211	10.620
Entidades locales	958.124	657.398	300.726
Privados y/o de propiedad Desconocida	1.562.356	843.381	718.975
Vecinales en mano común	0	0	0

Fuente: Anuario estadístico del Ministerio de Agricultura, Pesca y Alimentación.

Instituto Aragonés de Estadística (IAEST) - Tel: 976 713170 - email: iaest@aragon.es - www.aragon.es/iaest

Figure 4: Data Source Source: <https://servicios3.aragon.es/iaeaxi/tabla.do>

Also, conifers are predominant in Aragonese forests:

Naturaleza y biodiversidad	
Recursos forestales	
Usos forestales en Aragón según MFE50.	
Unidades:Hectáreas.	
	Aragón
TOTAL USOS FORESTALES	2.711.652
Bosques (masas arboladas)	1.534.873
Coníferas	937.482
Frondosas	424.749
Mixto	172.642
Terrenos cubiertos por vegetación arbustiva y/o herbácea	1.062.878
Matorrales	256.230
Notas:	
1.- MFE50: Mapa Forestal de España a escala 1:50.000 (Foto fija 2015)	
Fuente:Departamento de Agricultura, Ganadería y Medio Ambiente del Gobierno de Aragón.	
Instituto Aragonés de Estadística (IAEST) - Tel: 976 713170 - email: iaest@aragon.es - www.aragon.es/iaest	

Figure 5: Data Source Source: <https://servicios3.aragon.es/iaeaxi/tabla.do>

Annual felling has been fairly stable in Aragón in recent years, with values of over 175,000-200,000 m³ of timber per year:

Naturaleza y biodiversidad

Recursos forestales

Cortas de madera y aprovechamiento de leñas por titulari

Unidades:m3 con corteza y toneladas.

	Aragón					
	2020	2019	2018	2017	2016	2015
Cortas de madera (m3 con corteza)						
Montes gestionados por la DGA						
Total	149.783	119.354	135.798	167.982	134.434	175.261
Frondosa	3.118	5.030	13.351	1.532	14.113	4.049
Conífera	146.665	114.324	122.446	166.450	120.321	171.212
Montes de titularidad privada						
Total	38.285	54.209	44.598	52.887	55.066	27.594
Frondosa	141	74	2	252	140	35
Conífera	38.145	54.135	44.596	52.635	54.926	27.559

Fuente:Departamento de Agricultura, Ganadería y Medio Ambiente del Gobierno de A
Instituto Aragonés de Estadística (IAEST) - Tel: 976 713170 - email: iaest@aragon.es - www.arag

Figure 6: Data Source Source: <https://servicios3.aragon.es/iaeaxi/tabla.do>

In relation to the volume of wood stocks with bark, the data show relevant growths between the different inventories carried out in Aragón:

Evolución del volumen con corteza por tipo de vegetación, entre 1965 y 2005.

Existencias maderables	Tipo de vegetación arbórea	IFN1 (1965-1970)		IFN2 (1993-1995)		IFN3 (2004-2005)	
		Volumen maderable (m3)	%	Volumen maderable (m3)	%	Volumen maderable (m3)	%
Volumen con corteza	Coníferas	27.569.244	85%	39.267.186	88%	62.093.618	84%
	Frondosas	4.976.865	15%	5.355.570	12%	12.244.693	16%
	Total	32.546.109	100%	44.622.756	100%	74.338.311	100%

Figure 7: Data Source Source: Diagnostico escenario forestall Aragon 2020

Comsa Renovables does not harvest directly the forest, instead of these have a diferents 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. The characteristics of the forests in the area only allow that the major part of the operations are thinnings

Regarding biomass, 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 resocurse to produce their own products. Part of the total amount of biomass, as woodchips and pelet, comes from subresidues of these industries.

After progressive deforestation over centuries, even millennia, the general abandonment of the countryside and traditional agricultural uses, especially crops and pastures, over the last half century has favoured a reforestation of the forest, either through natural regeneration or afforestation: Thus, over the course of time, there has been a shift from secular deforestation to the current reforestation or regeneration, so that the forest has recovered much of the land lost over centuries, and also recorded in the forest inventories of the last 40 years. In addition to the renaturalisation of the territory, there has been a tertiarisation of the forest, whereby tertiary services and uses in forest areas now predominate over primary activities, so that the forest has lost its traditional role as a producer of raw materials from renewable forest resources, hence the progressive accumulation of stocks and the excessive tree density of forests.

Indeed, in addition to territorial imbalances and depopulation, especially in rural areas and even more so in the "forest villages", there are also sectoral deficiencies, especially in the primary sector with a low representation in the regional gross domestic product of the agricultural sector, which even shows a manifest decline, not so much perhaps agriculture as livestock farming and especially the forestry sub-sector, whose socio-economic contribution of productive activity and employment is negligible.

Since the mid-20th century, the exodus of the rural population and the abandonment of agricultural activities have accelerated, not so much agricultural activities but above all traditional livestock uses and even more so forestry uses which have generated the aforementioned expansion of forests and the renaturalisation of the territory. The main demographic problem in Aragon is depopulation, which is even more pronounced in rural areas, its ageing and territorial imbalances in the population system. Provincial densities are below the Spanish average density and well below European Union densities. Situation in Catalonia is different regarding population but social dynamics are similar.

Only the 33% of the total amount growing each year is harvested in the Area of Catalunya. These data is very low compared with the average in EU which is 69%. The Aragonese forest area, which today occupies more than half (55%) of the territory of Aragon, is practically unproductive, losing its productive vocation, as shown by the low rate of wood extraction in Aragonese forests, measured as the ratio between the volume extracted and the annual tree growth, which in Aragon currently represents barely 8% of the growth of all Aragonese forests, one of the lowest rates of wood extraction in Spain and Europe.

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.

2.3 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.

2.4 Quantification of the Supply Base

Supply Base

- a. **Total Supply Base area (million ha):** 3,10
- b. **Tenure by type (million ha):**2.10 (Privately owned), 1.00 (Public)
- c. **Forest by type (million ha):**3.10 (Temperate)
- d. **Forest by management type (million ha):**0.03 (Plantation), 3.07 (Natural)
- e. **Certified forest by scheme (million ha):**0.44 (PEFC)

Describe the harvesting type which best describes how your material is sourced: Thinning

Explanation: 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 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 pellet. These 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.

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

Explanation: The average of the timber in the region that are used as a biomass is a 38% if we consider the woodchips plus pellet. These 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.

For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling? Yes - Majority

Explanation: It is expected that with the forest treatments to be carried out, the forests will be improved and their survival will be ensured, increasing their resistance and resilience.

Was the feedstock used in the biomass removed from a forest as part of a pest/disease control measure or a salvage operation? Yes - Minority

Explanation: The only and very occasional operation would be related to the affectation of the forest disease *Tomicus destruens* (*Pinus pinea*), being obligatory the removal of all affected trees

What is the estimated amount of REDII-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated): N/A N/A

Explanation:N/A

Feedstock

Reporting period from: 01 Jan 2022

Reporting period to: 31 Dec 2022

- a. **Total volume of Feedstock:** 1-200,000 tonnes
- b. **Volume of primary feedstock:** 1-200,000 tonnes
- c. **List percentage of primary feedstock, by the following categories.**
 - Certified to an SBP-approved Forest Management Scheme: 80% - 100%
 - Not certified to an SBP-approved Forest Management Scheme: 0%
- d. **List of all the species in primary feedstock, including scientific name:** Pinus halepensis (Pino carrasco); Pinus nigra (Pino laricio); Pinus sylvestris (Pino silvestre); Pinus pinaster (Pino marítimo); Pinus pinea (Pino piñonero); Populus spp (Chopo);
- e. **Is any of the feedstock used likely to have come from protected or threatened species?** No
 - Name of species: N/A
 - Biomass proportion, by weight, that is likely to be composed of that species (%): N/A
- f. **Hardwood (i.e. broadleaf trees): specify proportion of biomass from (%):** 0,00
- g. **Softwood (i.e. coniferous trees): specify proportion of biomass from (%):** 100,00
- h. **Proportion of biomass composed of or derived from saw logs (%):** 0.00
- i. **Specify the local regulations or industry standards that define saw logs:** N/A
- j. **Roundwood from final fellings from forests with > 40 yr rotation times - Average % volume of fellings delivered to BP (%):** 0,00
- k. **Volume of primary feedstock from primary forest:** 0 N/A
- l. **List percentage of primary feedstock from primary forest, by the following categories. Subdivide by SBP-approved Forest Management Schemes:**
 - Primary feedstock from primary forest certified to an SBP-approved Forest Management Scheme: N/A
 - Primary feedstock from primary forest not certified to an SBP-approved Forest Management Scheme: N/A
- m. **Volume of secondary feedstock:** 0 N/A
 - Physical form of the feedstock: N/A
- n. **Volume of tertiary feedstock:** 0 N/A
 - Physical form of the feedstock: N/A
- o. **Estimated amount of REDII-compliant sustainable feedstock that could be collected annually by the BP:** N/AN/A

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

Feedstock type	Sourced by using Supply Base	FSC %	PEFC %	SFI %

	Evaluation (SBE) %			
Primary	0,00	0,00	100,00	0,00
Secondary	0,00	0,00	0,00	0,00
Tertiary	0,00	0,00	0,00	0,00
Other	0,00	0,00	0,00	0,00

3 Requirement for a Supply Base Evaluation

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

Is Supply Base Evaluation (SBE) is completed? No

N/A

Is REDII SBE completed? N/A

N/A

4 Supply Base Evaluation

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

4.1 Scope

Feedstock types included in SBE: N/A

SBP-endorsed Regional Risk Assessments used: Not applicable

List of countries and regions included in the SBE:

Country: N/A

Indicator with specified risk in the risk assessment used:
N/A

Specific risk description:

4.2 Justification

N/A

4.3 Results of risk assessment and Supplier Verification Programme

N/A

4.4 Conclusion

N/A

5 Supply Base Evaluation process

N/A

6 Stakeholder consultation

N/A

6.1 Response to stakeholder comments

N/A

7 Mitigation measures

7.1 Mitigation measures

N/A

7.2 Monitoring and outcomes

N/A

8 Detailed findings for indicators

Detailed findings for each Indicator are given in Annex 1 in case the Regional Risk Assessment (RRA) is not used.

Is RRA used? N/A

9 Review of report

9.1 Peer review

N/A

9.2 Public or additional reviews

N/A

10 Approval of report

Approval of Supply Base Report by senior management			
Report Prepared by:	Pablo Gómez Reino	Ingeniero de Montes	07 May 2023
	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:	Xavier Melgar Anguera	Bioenergy manager	15 Aug 2023
	Name	Title	Date

Annex 1: Detailed findings for Supply Base Evaluation indicators

N/A

Annex 2: Detailed findings for REDII Supply Base Evaluation

Section 1. RED II

N/A

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

10.1 Verification and monitoring of suppliers

N/A

10.2 Feedstock inspection and classification upon receipt

N/A

10.3 Supplier audit for secondary and tertiary feedstock

N/A