



Supply Base Report: Comsa Renovables

Second Surveillance Audit

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The promise of good biomass



Completed in accordance with the Supply Base Report Template Version 1.4

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
2	Description of the Supply Base
2.1	General description
2.2	Description of countries included in the Supply Base
2.3	Actions taken to promote certification amongst feedstock supplier
2.4	Quantification of the Supply Base
3	Requirement for a Supply Base Evaluation
4	Supply Base Evaluation
4.1	Scope
4.2	Justification
4.3	Results of risk assessment and Supplier Verification Programme
4.4	Conclusion
5	Supply Base Evaluation process
6	Stakeholder consultation
6.1	Response to stakeholder comments
7	Mitigation measures
7.1	Mitigation measures
7.2	Monitoring and outcomes
8	Detailed findings for indicators
9	Review of report
9.1	Peer review
9.2	Public or additional reviews
10	Approval of report
Annex 1: Detailed findings for Supply Base Evaluation indicators	

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: Ramón Perales Bañón, +34 690 004 344, ramon.perales@comsa.com

Company website: www.comsa.com

Date report finalised: 20 Jun 2022

Close of last CB audit: 20 Jun 2022

Name of CB: NEPCon 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

Feedstock origin (countries): Spain

2.2 Description of countries included in the Supply Base

Country:Spain

Area/Region: Cataluña

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.

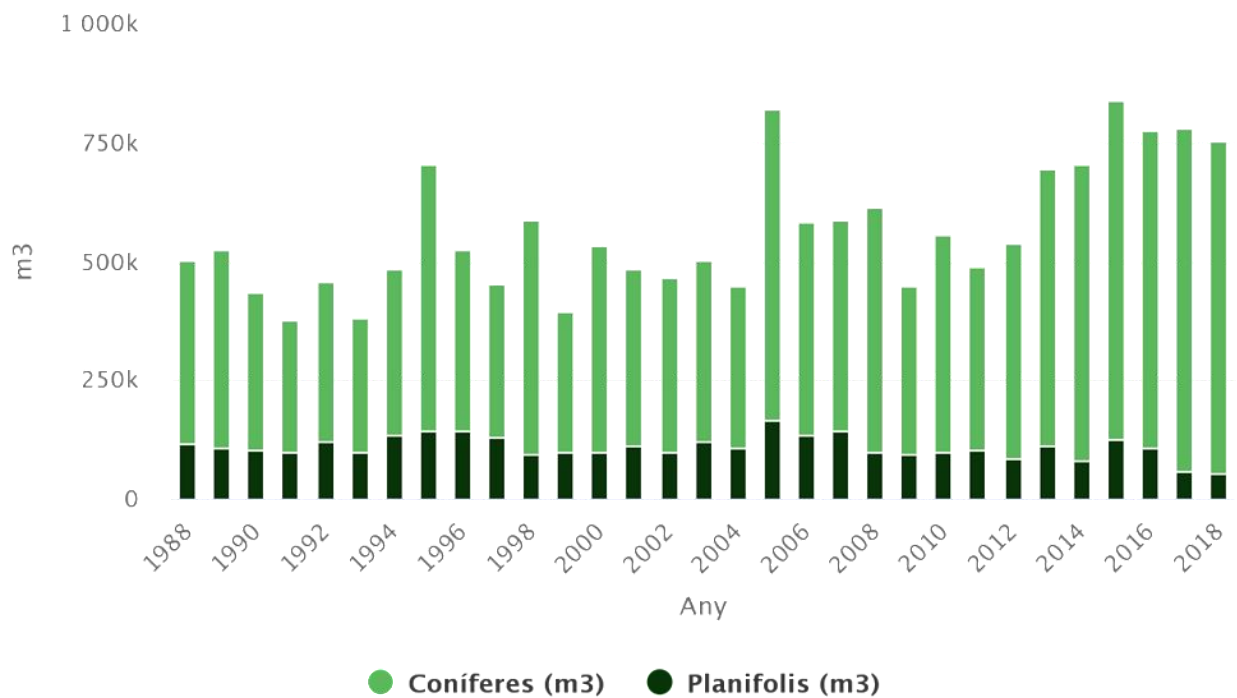
The company holds a valid PEFC Chain of Custody System with number: PEFC / 14-31-00318-BVC . The source region is Catalunya but also Aragon.



The principal species are Aleppo pine, Quercus sp, Stone pine, Maritime pine, Scots pine and Black pine. Catalunya and Aragon together holds a 67,76% of Private forests. In Catalunya since the last 25 years, where data is recorded, there has been an increase of volume of biomass due to the population having abandoned the villages to go to the cities to work.

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

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



Font: DGEFGM

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

Only the 33% of the total amount growing each year is harvested in the Area of Catalunya. These data s very low compared with the average in EU which is 69%. The biggest part of the wood harvested is conifer species with 700.000t which represents a 71% of the total cuttings.

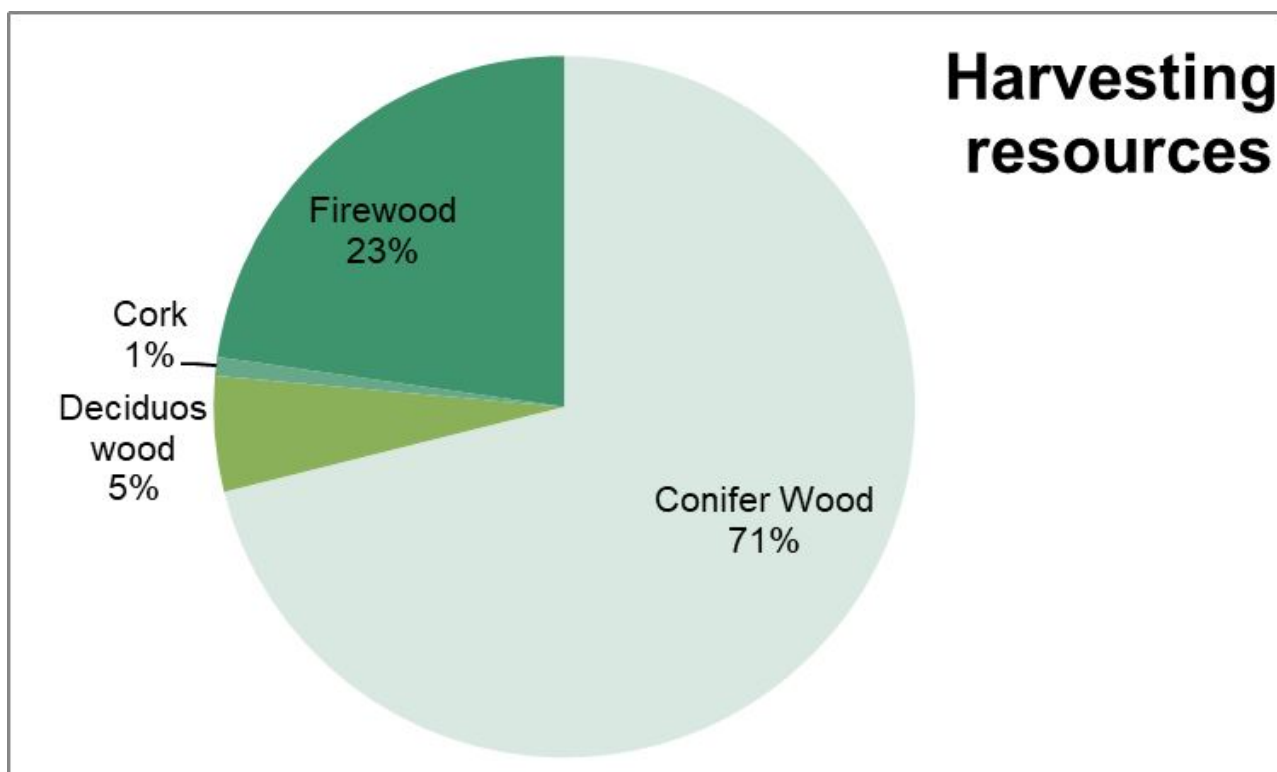


Figura 3: Data Source: <http://cpf.gencat.cat/ca/transparencia/estadistiques/gestio-forestal/>

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

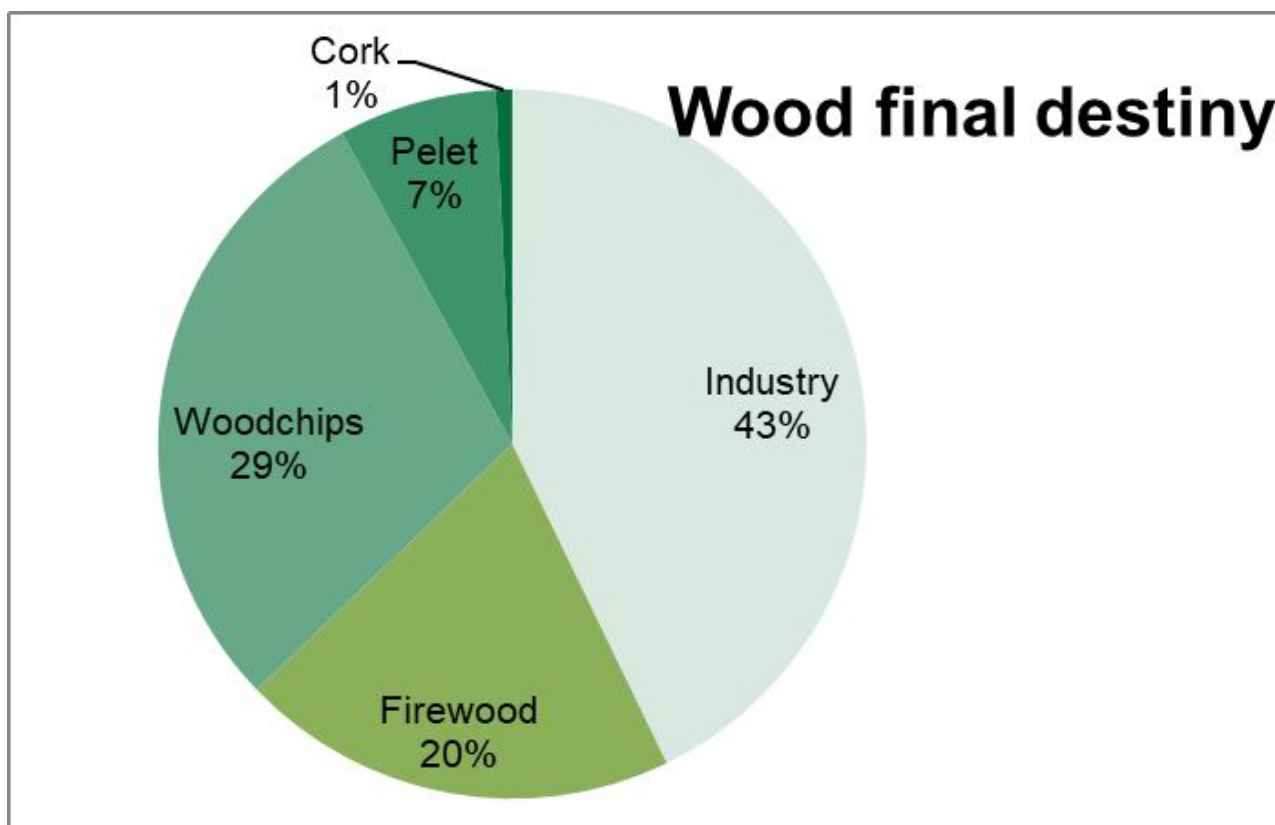


Figura 4: Data Source <http://www.observatoriforestal.cat/produccio-de-biomassa/>

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

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

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

Country: Spain

Area/Region: Aragón

Exclusions: No

In Aragón, also the principal species are Aleppo pine, Quercus sp, Stone pine, Scots pine and Black pine.

The areas of forest uses in Aragon are as follows:

	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
Herbazales	108.535
Prados	44.401
Pastizal-matorral	616.174
Mosaicos	37.538
Espacios abiertos sin vegetación o muy escasa	113.901
Montes sin vegetación superior	65.382
Humedales	40.027
Parques periurbanos	121
Áreas recreativas	31
Zonas incendiadas	8.340

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.

The results of the different harvest resources in Aragon, since 2004 are:

Cortas de madera y aprovechamiento de leñas por titularidad de los montes y grupos de especies.
Unidades: m3 con corteza y toneladas.

	2019	2018	2017	2016	2015	2014	2013	2012	2011	2010	2009	2008	2007	2006	2005	2004
Aragón																
Cortas de madera (m3 con corteza)																
Montes gestionados por la DGA																
Total	119.354	135.798	167.982	134.434	175.261	125.398	129.536	92.574	159.752	60.467	52.427	118.693	154.802	87.895	74.825	87.621
Frondosa	5.030	13.351	1.532	14.113	4.049	28.789	4.000	38.435	38.426	921	..	46.146	25.593	6.996	11.843	19.909
Conífera	114.324	122.446	166.450	120.321	171.212	96.609	125.536	54.139	120.326	59.546	..	72.547	129.209	80.899	62.982	67.712
Montes de titularidad privada																
Total	..	..	..	..	..	..	..	..	..	..	..	80.036	69.037	56.523	0	99.404
Frondosa	..	..	..	..	..	..	..	..	..	..	..	49.261	48.473	46.473	0	70.822
Conífera	..	..	..	..	..	..	..	..	..	..	..	30.775	20.564	10.050	0	28.582
Aprovechamiento de leñas (toneladas)																
Montes gestionados por la DGA																
Total	21.255	52.343	29.467	48.765	30.438	100.846	18.652	22.405	20.049	17.850	19.128	15.427	14.323	13.572	32.034	37.987
Frondosa	16.875	31.050	13.399	31.890	15.322	18.145	13.447	18.826	15.741	13.968	..	14.625	13.834	10.644	12.790	11.521
Conífera	4.380	21.293	16.068	16.875	15.115	82.701	5.205	3.579	4.308	3.881	..	802	489	2.928	19.244	26.465
Montes de titularidad privada																
Total	..	..	..	..	..	..	..	..	..	..	..	4.031	3.177	1.976	0	1.282
Frondosa	..	..	..	..	..	..	..	..	..	..	..	4.016	3.055	1.975	0	1.277
Conífera	..	..	..	..	..	..	..	..	..	..	..	15	122	1	0	5

Notas:

1) ...sin dato

2) Para los años 2004, 2005 y del 2010 al 2017, la fuente original proporcionaba los datos de aprovechamiento de leñas en estéreos, por lo que se ha realizado la conversión a toneladas, considerando como valor medio de conversión: 1 estéreo contiene alrededor de 0.52 toneladas.

Fuente: Departamento de Agricultura, Ganadería y Medio Ambiente del Gobierno de Aragón.

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

Feedstock

Reporting period from: 01 Jan 2021

Reporting period to: 31 Dec 2021

- 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 blanco); *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

Proportion of feedstock sourced per type of claim during the reporting period				
Feedstock type	Sourced by using Supply Base Evaluation (SBE) %	FSC %	PEFC %	SFI %
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

Is Supply Base Evaluation (SBE) is completed? No

N/A

4 Supply Base Evaluation

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:	Ramon Perales Bañon	Ingeniero de Montes/Técnico de biomasa	20 Jun 2022
	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:	Raimon Mariné Bellido	Director de Comsa Bioenergía	20 Jun 2022
	Name	Title	Date

Annex 1: Detailed findings for Supply Base Evaluation indicators

N/A