



Supply Base Report:

ForestPower A/S

Fourth Surveillance Audit

Sustainable Biomass Program
sbp-cert.org



Completed in accordance with the Supply Base Report Template Version 2.2 and SBP Bridging Requirements for Meeting the Directive EU/2023/2413 (REDIII)

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

Document history

Version 1.0	Published 26 March 2015
Version 2.0	Published 10 August 2023
Version 2.1	Published 15 April 2024
Version 2.2	Published 21 May 2025
Version 2.3	Published 14 August 2025

© Copyright Sustainable Biomass Program Limited 2025

Table of contents

1 Overview

2 Description of the Biomass Producer and the Supply Base

- 2.1 Description of the company
- 2.2 Detailed description of the Supply Base
- 2.3 Feedstock information

3 Supply Base Risk Assessments and Risk Management Measures

- 3.1 Summary of the Supply Base Evaluation
- 3.2 Conflicts with applicable national and sub-national legislation
- 3.3 Risk Management Measures

4 Stakeholder engagement

- 4.1 General description
- 4.2 Response to stakeholder comments

5 Report updates and approval

Annex 1: Detailed findings for Supply Base Evaluation indicators

Annex 2: EU RED Supply Base Evaluation

Annex 3: SBP Processing residues and/or Post-consumer feedstock requirements

Annex 4: EU RED detailed findings for Trees Outside Forest (TOF) feedstock

1 Overview

Producer name:	ForestPower A/S
Producer address:	Sepstrupvej 26, 8653 Them, Denmark
SBP Certificate Code:	SBP-05-12
Geographic position:	56.093100, 9.481900
Primary contact:	Rene Løvborg, +45 201 384 43, rene@rlskovservice.dk
Company website:	
Date report finalised:	03 Mar 2026
SBR reporting period from:	01 Jan 2025
SBR reporting period to:	31 Dec 2025
Name of the Certification Body:	DNV Business Assurance Finland Oy Ab
Certification Body Approval date:	19 May 2026
SBP Standard(s) used:	SBP Standard 1: Feedstock Compliance v2.0, SBP Standard 2: Feedstock Verification v2.0, SBP Standard 4: Chain of Custody v2.0, SBP Standard 5: Collection and Communication of Data v2.0, Instruction Document 1A: SBP Requirements for Primary Feedstock from Trees Outside Forests (TOF) v1.0, Instruction Document 5E: Collection and Communication of Energy and Carbon data. v2.1, Instruction Document EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413 v2.0
Feedstock origin (countries)	Denmark (Jylland)
Weblink to Standard(s) used:	https://sbp-cert.org/documents/standards-documents/standards

2 Description of the Biomass Producer and the Supply Base

2.1 Description of the company

Biomass producer located in Them, Denmark. Producing woodchips in cooperation with forest contractor RL Skovservice also located in Them, Denmark.

We produce roughly 40.000 ton of woodchips per year, mainly in forest and from trees outside forests.

Products included in the scope of SBP Certification: WB 2.1 Wood chips

Number of employees: 1

Annual maximum production capacity (metric tonnes): 40000

Number of direct feedstock suppliers: 1

Approximate number of feedstock sub-suppliers: 50

Description of the chain-of-custody and upstream supply chain:

Forest Power uses a subcontractor, RL Skovservice.

RL Skovservice provides the following services:

Screening of tasks

Work cards/planning cards

Harvesting of biomass

Chipping

Transport of biomass

Forest Power is responsible for the sale of biomass to CHP.

2.2 Detailed description of the Supply Base

Guidance: Tables below have been generated automatically for each sourcing country based on the selection of 'Feedstock origin (countries)' in section 1 above.

Annex 1 is generated by the system if the SBP SBE is used without Regional Risk Assessment(s) (RRAs). In case RRA(s) is used, further details shall be given only in section 3 below.

Annex 2 is generated if EU RED SBE is in the scope for each country separately.

Country	Denmark
Area/Region	Jylland
Exclusions	
Feedstock types	Primary
Feedstock Product Groups	Forest feedstock (1A), Trees outside forest (TOF) - Urban and landscape feedstock (2A), Trees outside forest (TOF) - Agricultural land feedstock (3A)
Feedstock inputs	SBP Compliant feedstock
Is the forest managed to supply energy and non-energy markets?	Yes - Majority

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
Risk assessment(s)	Yes – Regional Risk Assessment (RRA) used
Provide a concise summary of why a SBE was determined to be required or not required here:	
Forestpower harvests most of the feedstock in non-certified forests, which means that the supply base must be evaluated.	
Feedstock types included in SBE:	Primary
Includes EU RED SBE:	Yes
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	Yes
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	0.6300
Map(s) of the Supply Base area:	
	

2.3 Feedstock information

- a. **Total volume of Feedstock:** 1-200,000 tonnes
- b. **Volume of primary feedstock:** 1-200,000 tonnes
- c. **List of all the species in primary feedstock, including scientific name:**

Quercus spp	Oak
Picea abies	Norway spruce
Picea sitchensis	Sitka spruce
Pinus contorta	Logdepole pine
Pinus sylvestris	Scots pine
Abies alba	Silver fir
Abies nordmanniana	Normann fir
Picea omorika	Omorika spruce
Populus spp	Popular
Salix spp	Willow
Fagus sylvatica	Beech
Betula pendula	Birch
Larix spp	Larch
Sorbus spp	Rowan
Acer spp.	Sycamore
Abies procera	Nobel fir

- d. **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: A small amount of the feedstock are produced in areas that has been attacked by bark beetles or has tipped in storms

- e. **Hardwood (i.e. broadleaf trees): specify proportion of feedstock from (%):** 42.00
- f. **Softwood (i.e. coniferous trees): specify proportion of feedstock from (%):** 58.00
- g. **Proportion of feedstock composed of or derived from saw logs by weight (%):** 0.00
- h. **Indicate how you determine the proportion of saw log:** Specification used by the sawmill closest to where the wood was grown.
- i. **Roundwood from fellings from forests with > 40 yr rotation times - Average % volume of fellings delivered to BP (%):** 0.00
- j. **Select forest type(s) where the primary feedstock was sourced from:** Mix of The Above
- k. **Select the main harvesting system(s) used for the sourced primary feedstock:** Mix of the above
- l. **Volume of primary feedstock from primary forest:** 0

m. Volume of processing residues feedstock: 0

Physical form of the feedstock:

n. Share of SBP-recognised system claim for processing residues:

o. Volume of post-consumer feedstock: 0

Physical form of the feedstock:

p. Estimated amount of EU RED-compliant sustainable feedstock that could be collected annually by the BP:
100000 tonnes

q. What is the estimated amount of EU RED-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated): 3200000.00 tonnes

Explanation: According to the publication - The future of Danish wood chips towards 2050 - analysis and recommendations(1), it is estimated that the forests' production potential of biologically based carbon is between 3,200,000 and 5,500,000 tonnes of wood chips corresponding to 35-60 PJ. (1) Fremtiden for Dansk skov mod 2050 - Analyse og Anbefalinger, 2020, Træ til Energi. <https://www.danskskovforening.dk/startside-2/politisk-arbejde/trae-til-energi/>

3 Supply Base Risk Assessments and Risk Management Measures

Guidance: Biomass Producers shall demonstrate that any specified risks of sourcing feedstock not in compliance with SBP Standard 1 have been adequately reduced to low risk, following Standard 2 requirements. Following section applies to Biomass Producer's implementing SBP Supply Base Evaluation (SBP RRA or company own risk assessment). EU RED Supply Base Evaluation details are reported in Annex 2.

☐ **Not Applicable – Supply Base Evaluation not implemented**

3.1 Summary of the Supply Base Evaluation

General description of Danish forests and forestry Forests cover approx. 632,000 ha in Denmark, corresponding to approx. 14.7% of the country's total area. This area is expected to increase over time. Total standing timber in Danish forests is 138 million m³. Standing timber in the forests has been increasing rapidly from the 2000 statement until today. This is a result of the steadily increasing forest area and probably an increase in standing timber per hectare. Generally, Danish forests include a wide variety of wood species of which the most common species are: Norway spruce 13%, beech 13% and oak 12%. The numbers for the other wood species are: pine 11%, silver spruce 6%, Nordmann fir 5%, noble fir 2%, other fir species 7%, Sycamore maple 4%, birch 7%, ash 3% and other broadleaves 11%. In addition to this, unstocked areas are 5%. Broadleaves make up 44 per cent of the total wooded area whereas conifers make up 36 per cent. The rest is unstocked areas and areas where a particular wood species could not be determined. None of the wood species belong to the CITES or IUCN species. Approx. 2000 species are listed on the Danish Red List, and many of these species are related to forests, old forests in particular. Areas in which one or more red list species have been identified are often registered as Natura 2000 areas, protected by the Danish Forest Act and/or the Danish Nature Protection Act. <https://ecos.au.dk/forskningraadgivning/temasider/redlist/roedliste-2030> The estimated total number of forest estates in Denmark is 24,000. 89% of the total number of forest estates has a size between 0.5 and 20 ha. Most of the forest area is privately owned, either by individuals (59%) or by companies (10%) and foundations (6%). The Danish state forests make up 19% of the total forest area, while the area owned by municipalities and public institutions is 6%. This means that the Danish forest structure includes many private owners with forest areas of less than 20 ha. Atypically, Danish forestry legislation has no requirements as to how each estate plans forestry, nor does the forest owners have to apply for or report cutting in their forests. Danish forest owners are well-organised in various local and national associations. Dansk Skovforening (Danish Forest Association) is the trade organisation of private forest owners. Moreover, up to 6,000 owners of small forests are organised in local forest owner associations which help owners with advice and management of their forests and are also involved in forest policy. Similarly, many private forest owners also work with HedeDanmark and other forestry consultancies. Two certification options exist in forest management: PEFC and FSC. The areas owned by the Danish states have been certified according to both standards. In private and municipal forests, some 56,000 ha have been certified according to PE and 20,161 ha according to FSC. Total income in the production of forest products in Denmark is approx. DKK 1 billion. The sale of energy wood amounted to DKK 300 million in 2015. General description of Danish windbreaks Planted windbreaks are a tradition in Denmark. The systematic planting of windbreaks started in the 1930s. The first major windbreak planting guilds were set up in 1967 and windbreaks with mainly 3 and 6 rows of broadleaves were introduced. Since then, various subsidies have existed to establish windbreaks and most have been established with subsidies. Today, Denmark is estimated to have some 80,000 km of windbreaks. Windbreaks planted with subsidies must be maintained and cannot be removed. Wood for windbreaks that has been clearcut, must be replanted after 3 years. Description of the supply base ForestPower A/S's supply base is Danish forests, windbreaks, scenic areas and urban plantations, the supply base covers all of Denmark, mainly in Mid-Jutland (region Midtjylland). ForestPower A/S is a forest contractor that produces and sells wood chip. Wood chip production is approx. 30,000-40,000 tonnes a year; 70% of the wood chip is produced in areas outside forests, mainly windbreaks and small plantations and in connection with nature projects. The

base also includes clearing of trees and shrubs in connection with developments and expansion of infrastructure in Denmark. In the forests, the base is thinning in conifers and roundwood from conifer deforestation while the rest is branches and tops from both broadleaves and conifers.

3.2 Conflicts with applicable national and sub-national legislation

none

3.3 Risk Management Measures

Guidance: Please provide more details about specified risk indicators in each supply country and describe mitigation measures taken to address all specified risks associated with indicators.

Country: Denmark	
Area/sub-scope: Forest	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☒ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.1.1 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.	
Description of the specific risk:	
Risk conclusion and justification Forest Based on the evidence provided in the RRA Denmark, it is concluded that there is a specified risk that at least locally-important key biotopes in forests – including those covered by the Forest Act and those not covered by the Forest Act – have not yet been identified and mapped so may therefore be at risk from threats due to the sourcing of biomass.	
Mitigation measure:	
All work areas will be screened at the office and then physically inspected. Observations in connection with	

inspection and screening are registered on a map and checklist.
Map and checklist is shared with machine operators and forest workers.
How we operate, screen areas and perform the physical inspection, is described in our procedure (Entrepreneurhåndbogen).

Monitoring and outcomes:

Mapping and the concise checklist format effectively identifies and records protected elements (e.g. Section 3 areas and valuable forest). Together with the field inspection, we consider that relevant key species, habitats, ecosystems, and HCV areas related to biodiversity in the Supply Base have been identified.

Country: Denmark

Area/sub-scope: Forest

Risk Assessment used:

- ☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim
- ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim
- ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim
- ☒ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed
- ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim
- ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed
- ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed
- ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed
- ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim
- ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim
- ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim
- ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim
- ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim
- ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim
- ☐ Biomass Producer's own risk assessment

Indicator with specified risk:

2.1.2 Threats to and impacts on the identified key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified and evaluated.

Description of the specific risk:

Risk conclusion and justification Forest

Based on the RRA Denmark analysis, it can be concluded that threats to and impacts on the identified key species, habitats, ecosystems, and areas of HCV pertaining to biodiversity cannot be identified and evaluated in all forests irrespective of their coverage by the Forest Act. Therefore, the risk class for this indicator is assessed as specified for all forests.

Mitigation measure:

All work areas will be screened at the office and then physically inspected. Observations in connection with inspection and screening are registered on a map and checklist.
Map and checklist is shared with machine operators and forest workers.

How we operate, screen areas and perform the physical inspection, is described in our procedure (Entrepreneurhåndbogen).
Monitoring and outcomes:
The identification and assessment of areas potentially vulnerable to damage from biomass production, along with communication to machine operators, have ensured that no areas have been damaged as a result of our operations.

Country: Denmark
Area/sub-scope: Forest
Risk Assessment used:
☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☒ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:
2.1.3 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.
Description of the specific risk:
Risk conclusion and justification Forest Based on the RRA Denmark analysis, the risk for this Indicator is assessed as specified for both forests covered by the Forest Act and forests not covered by the Forest Act.
Mitigation measure:
All work areas will be screened at the office and then physically inspected. Observations in connection with inspection and screening are registered on a map and checklist. Map and checklist is shared with machine operators and forest workers. How we operate, screen areas and perform the physical inspection, is described in our procedure (Entrepreneurhåndbogen).
Monitoring and outcomes:

Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base have been maintained. Some areas may have been enhanced through the retention of high stumps; however, this has not been measured, and we do not claim specific expertise in assessing such effects.

Country: Denmark

Area/sub-scope: Forest

Risk Assessment used:

- ☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim
- ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim
- ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim
- ☒ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed
- ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim
- ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed
- ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed
- ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed
- ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim
- ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim
- ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim
- ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim
- ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim
- ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim
- ☐ Biomass Producer's own risk assessment

Indicator with specified risk:

2.2.9 Harvesting levels shall be justified as to how they can be sustained with reference to inventory and growth data for the Supply Base.

Description of the specific risk:

Scale of assessment The scale of assessment covers forest harvesting in Denmark.

Analysis

According to the Danish National Forest Inventory (NFI) 2021 – which covers all forests in the country – there has been a net increase in both forest area and standing volume in the period examined (2017–2021) (Nord-Larsen et al. 2023). Over the period examined, the standing volume on average increased by an estimated 2.1 million m³ per year, compared to a total annual harvest and mortality of 4.3 million m³ per year, for a total annual increment of 6.4 million m³ per year. Due to age class distribution in the individual forests, there can be management plan periods where the harvest levels exceed the increase in standing volume. These harvest levels are justified using inventory and growth data and do not threaten forest productivity or long-term economic viability. However, a forest management plan is not a legal requirement in Denmark for forests that are not Natura 2000 sites (Preferred by Nature 2017), and some smaller forest estates do not have management plans at all as opined by Sofie Tind Nielsen from WWF Denmark. In particular, in non-fredskov harvesting levels are not required by any legislation to be sustained regarding inventory and growth data.

Enforcement and monitoring

The Danish Environmental Protection Agency under the Ministry of Environment enforces the relevant legislation. Regular monitoring of the enforcement is conducted and reported by the concerned agencies.

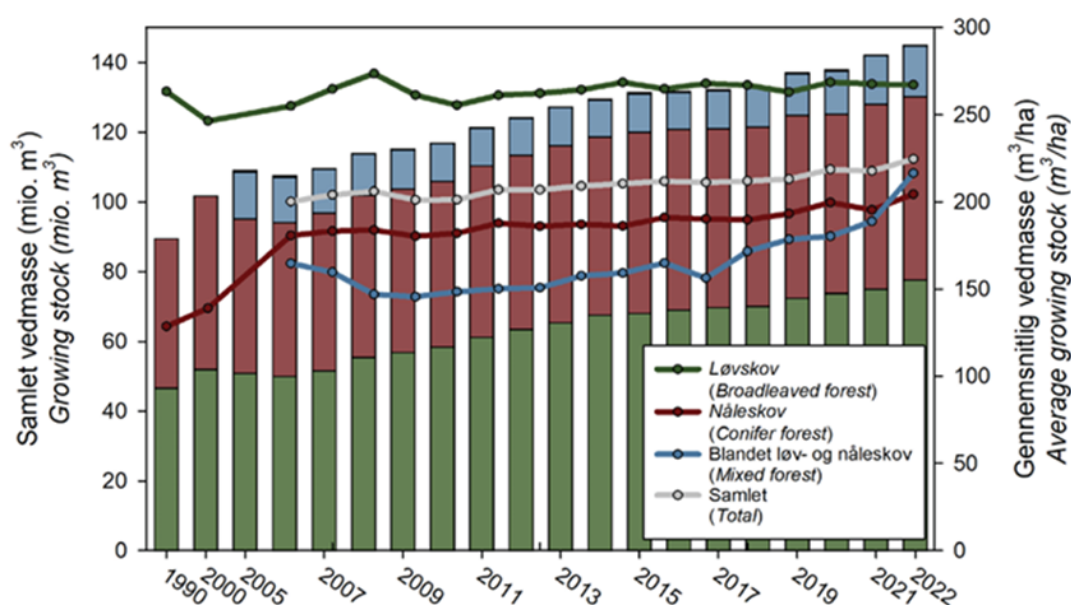
Risk conclusion and justification

Based on the above information, the risk for this Indicator has been assessed as low for forests covered by the Act and specified for forests not covered by the Act.

Mitigation measure:

Forests not covered by the Forest Act is often small and they do not have management plan or data of growth.

According to the Danish National Forest Inventory (NFI), the wood mass in the Danish forests Denmark, our Supply Base, grows every year. Which means that we are not over utilizing our forest area, nor forest not cover by the Forest Act.



Monitoring and outcomes:

There are currently no data available on forest development for 2025. Data are expected to become available in the fourth quarter of 2026.

Country: Denmark

Area/sub-scope: Forest

Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☒ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.10 Harvested areas shall be regenerated	
Description of the specific risk:	
Risk conclusion and justification The Danish Environmental Protection Agency in collaboration with the Danish Nature Agency – both under the Ministry of Environment enforces the Forest Act and Nature Protection Act. The Danish Energy Agency under the Ministry of Climate, Energy and Utilities enforces regulations related to energy. Regular monitoring of the enforcement is conducted and reported by the concerned agencies. Based on the RRA Denmark analysis, it is concluded that the risk rating for this Indicator is 'low risk' for forests covered by the Forest Act and 'specified risk' for forests not covered by the Forest Act.	
Mitigation measure:	
On all forest areas that are not covered by the Forestry Act and all TOF areas consisting of Hedgerows and smaller woodlots, we ensure that they are re-established where we carry out clear cutting. We have a legally binding agreement with the individual lot owner, which is signed before the task starts. The agreement is recognized in the industry and is used by all actors in our supply base. When biomass is produced on areas that protected by law, fx nature conservation ares, relevant athorities are consulted. How we operate, screen areas and perform the physical inspection, is described in our procedure (Entrepreneurhåndbogen).	
Monitoring and outcomes:	
In 2025, ten reforestation agreements were established. It is our experience that forest owners generally have a good understanding of the replanting requirement. In some cases, RL Skovservice is responsible for carrying out the replanting. Certain areas will be regenerated naturally, while in other areas planting is carried out by the forest owner.	

Country: Denmark									
Area/sub-scope: Forest									
Risk Assessment used:									
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☒ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment								
Indicator with specified risk:									
3.2.3 feedstock shall not be sourced from forest areas in the Supply Base which, according to local definitions or norms, are classified as having combined attributes of high carbon stocks and high conservation value (HCV).									
Description of the specific risk:									
Risk conclusion and justification Based on the evidence provided in the RRA Denmark, it is concluded that there is a risk that at least locally important key biotopes both in forests covered by the Forest Act and forests not covered by the Forest Act have not yet been identified and mapped and may therefore be at risk due to the sourcing of biomass. In practice, the areas of concern would be old, mature forest stands that are in a natural or semi-natural state and have not been identified or mapped. However, it is also concluded that some source types are inherently low in key biotopes, such as first-generation afforestation areas or even-aged stands of conifers.									
Mitigation measure:									
There is extra focus on preserving natural values when we work in old deciduous forests. Old deciduous forests will often appear on the HNV map and result in a value above 9. Screening the HNV map is part of our procedure. If not, we will see it when the areas are physically inspected. <table border="1"> <thead> <tr> <th>Forest Origin</th> <th>Mitigating measures</th> </tr> </thead> <tbody> <tr> <td>1. FSC or PEFC-certified forests</td> <td>we will obtain certification information from the forest we work in. For FSC-certified forests, this will be enough, for PEFC-certified forests, we must...</td> </tr> <tr> <td>2. Estates with a green management plan</td> <td>we will carry out a screening as we do on all other areas. The few properties that have a green management plan have often not maintained the plan and therefore it is not</td> </tr> <tr> <td>3. Even- aged stands of conifers</td> <td>all areas will be screened at the office and then physically inspected. Observations in connection with inspection and screening are registered on a</td> </tr> </tbody> </table>		Forest Origin	Mitigating measures	1. FSC or PEFC-certified forests	we will obtain certification information from the forest we work in. For FSC-certified forests, this will be enough, for PEFC-certified forests, we must...	2. Estates with a green management plan	we will carry out a screening as we do on all other areas. The few properties that have a green management plan have often not maintained the plan and therefore it is not	3. Even- aged stands of conifers	all areas will be screened at the office and then physically inspected. Observations in connection with inspection and screening are registered on a
Forest Origin	Mitigating measures								
1. FSC or PEFC-certified forests	we will obtain certification information from the forest we work in. For FSC-certified forests, this will be enough, for PEFC-certified forests, we must...								
2. Estates with a green management plan	we will carry out a screening as we do on all other areas. The few properties that have a green management plan have often not maintained the plan and therefore it is not								
3. Even- aged stands of conifers	all areas will be screened at the office and then physically inspected. Observations in connection with inspection and screening are registered on a								

	map and checklist. Through this, it is shared with machine operators and forest workers.
4. Thinning in first-generation afforestation areas	As described in point 3.
5. Uneven-aged stands or stands of broadleaf species	As described in point 3.
Monitoring and outcomes:	
Together with the field inspection ,mapping and the concise checklist format effectively identifies and records not protected elements in the forest. Combiende with expienced machindrivers, we consider that relevant not registered areas wtiH HCV are protected.	

Country: Denmark	
Area/sub-scope: TOF	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☒ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.4 Where the removal of harvest forest residues and/or stumps occurs, this shall not lead to irreversible negative impacts to the ecosystem.	
Description of the specific risk:	
Risk conclusion and justification In summary of the above, it is assessed, that the level of dead wood is considered to be at a low level today. The lack of inventory on dead wood in TOF origins lead to a conclusion that no strong impact assessment on ecosystem can be assessed and this should be considered in the coming years. Therefore, on basis of an anticipated low level of dead wood, lack of inventory of dead wood and lack of assessment on ecosystem, a precautionary assessment of a specified risk for negative impact on the ecosystem in	

hedgerows and smaller woodlots and nature conservation areas is assessed. However, for the TOF origins “Woody residue from agricultural land” and “Woody Energy crops, short rotation coppice” the feedstock type of these origins is not considered to produce deadwood and therefore there is low risk for these two origins.

Mitigation measure:

Existing dead wood in windbreaks and smaller forest stands is preserved if it does not pose a danger or can spill over into intensively managed areas. machin operators are educated in preservining and creating dead or dying wood. Dead or dying wood can be advantageously left in connection with extensively managed areas, e.g. along §3 areas.

Monitoring and outcomes:

In the recent year, we have focused on retaining deadwood in shelterbelts and small forest stands. In our assessment, this increased focus has resulted in the creation of more high stumps where conditions have allowed.

Country: Denmark

Area/sub-scope: TOF

Risk Assessment used:

- ☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim
- ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim
- ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim
- ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed
- ☒ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim
- ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed
- ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed
- ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed
- ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim
- ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim
- ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim
- ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim
- ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim
- ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim
- ☐ Biomass Producer’s own risk assessment

Indicator with specified risk:

2.2.5 Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.

Description of the specific risk:

Risk conclusion and justification

It is concluded that the risk of negative impacts on ground water, surface water and water downstream leads to the following assessments:

Landscape areas

Hedgerows and smaller woodlots:

- **Risk is considered low.** Landscape areas are considered to have use-levels of pesticides and nitrogen

which are far below the levels of the agricultural industry at large and more comparable to the lower levels used in forestry. It is anticipated that even though there is no direct protection for lakes of less than 100 m² they benefit from landowners' interest in protecting them and from the general protection of larger lakes and therefore low risk is considered for these when found in connection with hedgerows or smaller wood lots.

Nature conservation areas:

- The water course regulations implemented by the municipalities differ across Denmark and set different protection zones to water courses. BEK nr 919 (2016). As feedstock is harvested along protection zones across Denmark, these areas are important for downstream protection of hydrology. Data are insufficient to settle on low risk, and therefore as a precautionary approach **specified risk** is suggested for 1) altered/reduced water quality, including but not limited to, sedimentation, turbidity, water temperature; 2) altered/Reduced water quantity, including but not limited to, increased or decreased volume, seasonality, peak-flow, surface run-off and 3) altered/reduced of riparian habitat and function (SBP, 2023)

Woody residues from agricultural land including primary agricultural production site

- The trends are neutral to positive for the Harmonized Risk Indicators for pesticide use in Denmark. Regarding nitrogen leaching, the surplus in the field balance has fallen approx. 44% between 2004 and 2020 – which is good. Christmas tree plantations and orchards are considered to have usage of pesticides and nitrogen which are at the same levels as for the agricultural industry at large. This is supported by calculations on use of pesticides from the Danish Christmas Tree Association with information indicating a slightly lower use than average for the agricultural industry, therefore low risk is assessed for woody residues production. Regarding the protection of lakes under 100 m² which aren't protected by the Nature Protection Act, there is considered small likelihood of these on the typical agricultural land, and therefore **low risk.**

- Regarding the primary agricultural production, this indicator is interlinked with indicator 2.2.7 where specified risk is raised, therefore **specified risk** is suggested for primary agricultural production of indicator 2.2.5.

Wood energy crops, short rotation coppice: low risk

- The trends are neutral to positive for the Harmonized Risk Indicators for pesticide use in Denmark. Regarding nitrogen leaching, the surplus in the field balance has fallen approx. 44% between 2004 and 2020 – which is good. Regarding the protection of lakes under 100 m² which aren't protected by the Nature Protection Act, there is considered small likelihood of these on the typical land where the energy crops is established and therefore **low risk.**

Mitigation measure:

In connection with our screening, §3 registered watercourses are mapped and relevant authorities are involved if felling is to be carried out along the watercourse. See Entreprenørhåndbogen

If felling is to be carried out at watercourses that are not protected by NBL §3, we work according to the requirements of the associated watercourse regulations (vendløbsregulativ). If there are no regulations, the relevant authority is contacted.

If there are no regulations, the relevant authority is contacted to clarify any requirements for the felling work.

Monitoring and outcomes:

We have not carried out any activities that have had a negative impact on the aquatic environment.

Country: Denmark

Area/sub-scope: TOF	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☒ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.7 Pesticides shall only be used as part of an Integrated Pest Management (IPM) plan in compliance with national legislation, chemical safety data sheets and industry best practice. Banned pesticides shall not be used.	
Description of the specific risk:	
Risk conclusion and justification Assessment of primary production of the agriculture: The document inspection (aktindsigt) of the Danish Society for Nature Conservation and the report from the Ministry of Environment on challenges with the Danish groundwater are surprising and suggest a risk of use of pesticides no longer legal in Denmark. It may be considered for the assessment that especially Fastac-50 was found in the first year after it was banned in Denmark, and that some producers may not have been aware of the ban. However, the combination of findings from The Danish Society for Nature Conservation and the newspaper Politiken along with the groundwater analysis by the Ministry of Environment's findings of 15 substances above the quality requirement of 0.1 µg/L leads to the suggestion of specified risk assessment on primary agricultural production. Furthermore, Christmas trees producers with an area of below 10 hectares are not obliged to report their pesticide usage to the authorities. This also support the conclusion of specified risk. * For woody residues it is particularly important to note that when sourcing woody residues from agricultural production a risk assessment has to be performed both for the production of the biomass (the residues), but also the primary production of agriculture i.e. management of the orchard plantation. (SBP Instruction Document 1A)	
Mitigation measure:	
Landowners who supply biomass from Christmas tree plantations and orchards must sign a sworn statement regarding their use of pesticides before starting work. See Entreprenørhåndbogen.	
Monitoring and outcomes:	
Landowners have signed declarations confirming that no illegal pesticides have been used. To our knowledge, no cases involving the use of illegal pesticide products by Christmas tree producers were identified in 2025.	

Country: Denmark	
Area/sub-scope: TOF	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☒ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.1.1 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.	
Description of the specific risk:	
Risk conclusion and justification TOF As described in RRA TOF Denmark both private and public based identification systems of HCV's exist on TOF origins in Denmark, there is no systematic identification of HCV's and therefore the indicator is assessed as specified risk.	
Mitigation measure:	
TOF Origin Landscape areas - Hedgerows and smaller woodlots - Nature conservation areas Urban, domestic and infrastructure	Mitigating measures All areas will be screened at the office and then physically inspected. Observations in connection with inspection and screening are registered on a map and checklist. Through this, it is shared with machine operators and forest workers. Projects in areas protected by the Nature Protection Act are planned with the local authorities (kommune), we only work in these areas if we have permission or a dispensation. N/A

Woody residues from agricultural land

- Woody residues production Low risk
- Primary production of the agriculture N/A
- Wood energy crops, short rotation coppice Low risk

Monitoring and outcomes:

Mapping and the concise checklist format effectively identifies and records protected elements (e.g. Section 3 areas and valuable forest). Together with the field inspection, we consider that relevant key species, habitats, ecosystems, and HCV areas related to biodiversity in the Supply Base have been identified.

Country: Denmark

Area/sub-scope: TOF

Risk Assessment used:

- ☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim
- ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim
- ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim
- ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed
- ☒ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim
- ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed
- ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed
- ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed
- ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim
- ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim
- ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim
- ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim
- ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim
- ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim
- ☐ Biomass Producer's own risk assessment

Indicator with specified risk:

2.1.2 Threats to and impacts on the identified key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified and evaluated.

Description of the specific risk:

Conclusion for hedgerows and smaller wood lots:

It is concluded that the biodiversity importance of hedgerows in Denmark isn't unique; that hedgerows have national scale importance for red listed species and local importance for important flora and fauna and; that hedgerows have been cut extensively since biomass became sellable to Combined Heat and

Powerplants. The handbook by the Energy Agency also handles the abovementioned points as critical for the risk assessment of high nature values and require a professional assessment before a harvest activity can take place. On this basis, and in line with the Danish Energy Agency, it is concluded that there is specified risk for threats to and impacts on the key species, habitats, ecosystems, and areas of high conservation

value (HCV) pertaining to biodiversity in hedgerows and smaller woodlots.

Conclusion for Nature Conservation areas:

it is concluded that since nature conservation areas “grow into” and “out of” protection then there is risk of wrongly assessing if the harvest of biomass will lead to a change in status on nature conservation and therefore specified risk for threats to and impacts on the key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity is assessed for Nature Conservation areas.

Mitigation measure:

TOF Origin	Mitigating measures
Landscape areas	
- Hedgerows and smaller woodlots	All areas will be screened at the office and then physically inspected. Observations in connection with inspection and screening are registered on a map and checklist. Through this, it is shared with machine operators and forest workers.
- Nature conservation areas	Projects in areas protected by the Nature Protection Act are planned with the local authorities (kommune), we only work in these areas if we have permission or a dispensation.
Urban, domestic and infrastructure	N/A
Woody residues from agricultural land	
- Woody residues production	Low risk
- Primary production of the agriculture	N/A
Wood energy crops, short rotation coppice	Low risk

Monitoring and outcomes:

The identification and assessment of areas potentially vulnerable to damage from biomass production, along with communication to machine operators, have ensured that no areas have been damaged as a result of our operations.

Country: Denmark

Area/sub-scope: TOF

Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☒ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.1.3 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.	
Description of the specific risk:	
Risk Conclusion and justification TOF <u>Landscape and smaller wood lots</u> On basis lack of maintenance and enhancement plans for: Red listed species and species on the EU habitat directive; habitat provided by old/older/food trees; habitat provided by continuous hedgerows and the habitat which hedgerows of native species provide on sandy soils, it is concluded that there is specified risk for maintenance and enhancement of key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base. <u>Nature conservation areas</u> As the practice of how to maintain and enhance HCV's is different between municipalities the indicator is assessed as specified risk. A guideline on clearing obligation on farmlands has been published in 2023. There is considered low risk in relation to this guideline as the farmers are obliged to clear the land with 5 years interval which is not considered such a long period which will create habitat which should be protected.	
Mitigation measure:	
TOF Origin Landscape areas - Hedgerows and smaller woodlots - Nature conservation areas	Mitigating measures All areas will be screened at the office and then physically inspected. Observations in connection with inspection and screening are registered on a map and checklist. Through this, it is shared with machine operators and forest workers. Projects in areas protected by the Nature Protection Act are planned with the local authorities (kommune), we only work in these areas if we have permission or a dispensation.

Urban, domestic and infrastructure	N/A
Woody residues from agricultural land	
- Woody residues production	Low risk
- Primary production of the agriculture	N/A
Wood energy crops, short rotation coppice	Low risk
Monitoring and outcomes:	
Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base have been maintained. Some areas may have been enhanced through the retention of high stumps; however, this has not been measured, and we do not claim specific expertise in assessing such effects.	

Country: Denmark	
Area/sub-scope: TOF	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☒ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.2 Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.	
Description of the specific risk:	
Risk conclusion and justification TOF	

Hedgerows and smaller woodlots

On basis of the general lack of legal protection, identification and mapping of key ecosystems and habitats of hedgerows and smaller woodlots the sourcing of feedstock for biomass may pose a threat to these areas. This indicator is considered to be strongly coherent with indicator 2.1.2 and therefore specified risk is suggested.

Nature conservation areas

Nature Conservation Areas in the landscape, Natura 2000 areas and individual protected areas – as they are mapped, protected and/or preserved in their natural state - are sufficiently maintained and also enhanced in Denmark. However, this indicator is considered to be strongly coherent with indicator 2.1.2 and therefore specified risk is suggested. Specified risk is suggested on the basis that there are no uniform guidelines

given by the municipalities, for the degree or way of felling which maintain or enhance ecosystems, their health, vitality or functions.

Mitigation measure:

TOF:

TOF Origin	Mitigating measures
Landscape areas	
- Hedgerows and smaller woodlots	All areas will be screened at the office and then physically inspected. Observations in connection with inspection and screening are registered on a map and checklist. Through this, it is shared with machine operators and forest workers.
- Nature conservation areas	Projects in areas protected by the Nature Protection Act are planned with the local authorities (kommune), we only work in these areas if we have permission or a dispensation.
Urban, domestic and infrastructure	N/A
Woody residues from agricultural land	
- Woody residues production	N/A
- Primary production of the agriculture	N/A
Wood energy crops, short rotation coppice	N/A

Monitoring and outcomes:

All projects undergo an initial screening. If the screening identifies a need for an exemption or permit, this will be obtained from the relevant authority before work begins.

For activities in protected natural areas, prior approval is always obtained in accordance with applicable legislation (including the Danish Nature Protection Act, Section 3).

If the required approval is not granted, the project will not be carried out.

For projects involving the removal of windbreaks, restoration agreements are prepared

Country: Denmark	
Area/sub-scope: TOF	
Risk Assessment used:	
	☐ SBP-RRR-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRR-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRR-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRR-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☒ SBP-RRR-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRR-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRR-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRR-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRR-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRR-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRR-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRR-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRR-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRR-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.10 Harvested areas shall be regenerated	
Description of the specific risk:	
Risk conclusion and justification TOF <u>Hedgerows and smaller woodlots</u> There are no area specific legislation assuring regeneration, on this basis specified risk is suggested. However, site specific control systems or certifications which are recognized by the Energy Agency it is suggested could mitigate the risk. <u>Nature conservation areas</u> The Nature Protection Act and site conservations define what change in state of a particular area which is allowed. The guideline differs from municipality to municipality and therefore there is no certainty about which intervention will lead to "no change in status" or a better conservation status and therefore specified risk is assessed.	
Mitigation measure:	
On all TOF areas consisting of Hedgerows and smaller woodlots, we ensure that they are re-established where we carry out clear cutting. We have a legally binding agreement with the individual lot owner, which is signed before the task starts. The agreement is recognized in the industry and is used by all actors in our supply base. When biomass is produced on areas that protected by law, ex nature conservation areas, relevant authorities are consulted. How we operate, screen areas and perform the physical inspection, is described in our procedure (Entrepreneurhåndbogen).	
Monitoring and outcomes:	

In 2025, three reforestation agreements were established. It is our experience that forest owners generally have a good understanding of the replanting requirement. In some cases, RL Skovservice is responsible for carrying out the replanting, while in other areas the land owner carries out the planting.

4 Stakeholder engagement

4.1 General description

Biomass Producer's stakeholder engagement start date: 14 Oct 2025

Biomass Producer's stakeholder engagement end date: 20 Nov 2025

Total number of stakeholders contacted: 14

Give a general description of the process of Stakeholders Engagement, including stakeholders contacted, method of communication and a summary of the comments received:

A broad forum of stakeholders has been informed in our certification process. These are NGOs within the green sector, university, other certification schemes, energy producers and selected wood industries.

Communication has been through E-mail.

We received no comments.

4.2 Response to stakeholder comments

5 Report updates and approval

This document is: Updated SBR (surveillance audits/scope-change audits)

minor changes in sektion 1-5 and annex 2 and 4

Name	René Lønborg
Title	Management representative
Date of report approval	03 Mar 2026

Annex 1: Detailed findings for Supply Base Evaluation indicators

Annex 2: EU RED Supply Base Evaluation

Countries where EU RED Supply Base Evaluation is used	
Country	Denmark
Area	Jylland
Sustainable harvesting criteria 29(6)	
(i) The legality of harvesting operations	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-EU-DK-FOR_v1.1 REDIII Level A for Denmark FOR
Level B management system at the level of the forest sourcing area	N/A
(ii) Forest regeneration of harvested areas	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Forests covered by Danish Forest Act = Level A Forests not covered by Danish Forest Act = Level B When areas of forest that are not covered by the Forest Act are cleared, a legally binding agreement is made with the landowner regarding re-establishment/replanting.
(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grasslands, heathland and peatlands, are protected with the aim of preserving biodiversity and preventing habitat destruction, unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-EU-DK-FOR_v1.1 REDIII Level A for Denmark FOR
Level B management system at the level of the forest sourcing area	N/A
(iv) that harvesting is carried out considering the maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth forests as defined in the country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the	

country where the forest is located, and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with requirements to use logging systems that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and habitats	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	The procedure is described in the "Entrepreneur handbook" Clearcuts: They are planned and maintained at a scale that ensures timely establishment of the subsequent stand and safeguards the forest microclimate and the stability of surrounding stands. Soil: Work in the forest is carried out when the soil is serviceable. Suitable machines are used with ground pressure adapted to the task. Possibly in combination with fixed tracks. If significant damage occurs, the work is stopped and the owner is contacted. Dead wood: In all tasks, the machine operator is aware of preserving as much dead wood as possible in dialogue with the individual owner. Dead and dying wood can be advantageously left in connection with key elements in the forest, e.g. waterholes or forest edges.
(v) That harvesting maintains or improves the long-term production capacity of the forest.	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Forests covered by Danish Forest Act = Level A Forests not covered by Danish Forest Act = Level B When areas of forest that are not covered by the Forest Act are cleared, a legally binding agreement is made with the landowner regarding re-establishment/replanting.
(vi)¹ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(a) primary forest and other wooded land and old growth forest, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located. If there is no definition of old growth forest at the national level, then the following definition shall apply: A forest stand or area consisting of native tree species that have</i>	

developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	This is checked during the screening of all forest and other wooded lands, as well as during field control before and after harvest.

(vi)² That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.

Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

*(b) **highly biodiverse forest** and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.*

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	This is checked during the screening of all forest and other wooded lands, as well as during field control before and after harvest.

(vi)³ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.

Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

*(d) **highly biodiverse grassland** spanning more than one hectare that is: (i) natural, namely grassland that would remain grassland in the absence of human intervention and that maintains the natural species composition and ecological characteristics and processes; or (ii) non-natural, namely grassland that would cease to be grassland in the absence of human intervention and that is species-rich and not degraded and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the harvesting of the raw material is necessary to preserve its status as highly biodiverse grassland.*

Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-EU-DK-FOR_v1.1 REDIII Level A for Denmark FOR
Level B management system at the level of the forest sourcing area	N/A

(vi)⁴ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under

the same conditions of determination of the status of land specified in those paragraphs.

Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

*(e) **heathland** - Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).*

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	This is checked during the screening of all forest and other wooded lands, as well as during field control before and after harvest. No biomass from heathlands.
(vi)⁵ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (4): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status: (a) wetlands, namely land that is covered with or saturated by water permanently or for a significant part of the year (NOTE: Evidence of verification of wetlands should reflect seasonal changes within a year).</i>	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-EU-DK-FOR_v1.1 REDIII Level A for Denmark FOR
Level B management system at the level of the forest sourcing area	N/A
(vi)⁶ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (5): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was peatland in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.</i>	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-EU-DK-FOR_v1.1 REDIII Level A for Denmark FOR
Level B management system at the level of the forest sourcing area	N/A

(vii) that installations producing biomass fuels from forest biomass, issue a statement of assurance, underpinned by company-level internal processes, for the purpose of the audits conducted pursuant to Article 30(3), that the forest biomass is not sourced from the lands referred to in point (vi).

Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	<i>Not applicable, requirement only applies to Level A</i>

LULUCF criteria 29(7)

Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-endorsed REDII Level A risk assessment for Article 29(7) LULUCF
Level B management system at the level of the forest sourcing area	N/A

Annex 2a: EU RED II Supply Base Evaluation

Annex 3: SBP Processing residues and/or Post-consumer feedstock requirements

☒ Not Applicable (Processing Residues and/or post-consumer feedstock not used)

Verification and monitoring of suppliers

N/A

Feedstock inspection and classification upon receipt

N/A

Supplier audit for processing residues and post-consumer feedstock

N/A

Annex 4: EU RED detailed findings for Trees Outside Forest (TOF) feedstock

NOTE: For “Trees outside forests (TOF) – Urban and landscape feedstock” no EU RED sustainability requirements apply, only the GHG savings criteria apply (SBP EU RED Bridging ID v2.0 Section 1.1). The land use category in this case is neither forest land nor agricultural land. For “Trees outside forests (TOF) – Agricultural land feedstock” the applicable criteria are Article 29 paragraphs (2)-(5).

Country: Denmark - Jylland

Article 29 (2): Soil quality and soil carbon

Biomass fuels produced from waste and residues derived not from forestry but from agricultural land shall be taken into account for the purposes referred to in points (a), (b) and (c) of the first subparagraph of paragraph 1 only where operators or national authorities have monitoring or management plans in place in order to address the impacts on soil quality and soil carbon. Information about how those impacts are monitored and managed shall be reported pursuant to Article 30(3).

(i) Impacts on soil quality

Step 1: Identification of applicable laws

Have the applicable law(s) been identified?

Yes

List of applicable law(s)

Sources

Step 2: Description of enforcement and monitoring by competent authorities

Description of the practical implementation and monitoring of the law(s)

Sources

Is the enforcement and monitoring ensured for the identified law(s)?

Yes

Step 3: Evaluation of the effectiveness of the legal framework

Evaluation of the practical implementation of the law(s) and explanation

for the evaluation	
Sources	
Is legal framework effective?	Yes
Step 4: Detailed description of a management plan and monitoring at economic operator level	ref. Annex 6 RED II Lavel A risk assesment in RRA TOF Denmark
(ii) Impact on soil carbon	
Step 1: Identification of applicable laws	
Have the applicable law(s) been identified?	Yes
List of applicable law(s)	
Sources	
Step 2: Description of enforcement and monitoring by competent authorities	
Description of the practical implementation and monitoring of the law(s)	
Sources	
Is enforcement and monitoring ensured for the identified law(s)?	Yes
Step 3: Evaluation of the effectiveness of the legal framework	
Evaluation of the practical implementation of the law and explanation for the evaluation	
Sources	

Is legal framework effective?	Yes
Step 4: Detailed description of a management plan and monitoring applied at economic operator level	ref. Annex 6 RED II Lavel A risk assesment in RRA TOF Denmark

Article 29 (3a): Protection of land with high biodiversity value

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

- (a) *primary forest and other wooded land and old growth forest, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located.*

Description of a management system process to meet the requirement.	Before the task starts, areas are screened for compliance with relevant legislation, such as the Forest Act, the Nature Protection Act, and internationally protected areas, e.g. Natura 2000 areas - which protect these areas. (BEK no. 495 of 16/05/2025 chp 4.3.1) All smaller forest areas under 0.5 ha are screened and mapped before biomass is produced. The procedure is described in the contractor handbook (entreprenørhåndbogen.) Ortofotos from 2007 are consulted as a part of the screening process.
---	--

Article 29 (3b): Protection of land with high biodiversity value

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

- (b) *highly biodiverse forest and other wooded land which is species-rich and not degraded, or has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes;*

Description of a management system process to meet the requirement.	Before the task starts, areas are screened for compliance with relevant legislation, such as the Forest Act, the Nature Protection Act, and internationally protected areas, e.g. Natura 2000 areas - which protect these areas. (BEK no. 495 of 16/05/2025 chp 4.3.1) All smaller forest areas under 0.5 ha are screened and mapped before biomass is produced. The procedure is described in the contractor handbook (entreprenørhåndbogen.) Ortofotos from 2007 are consulted as a part of the screening process. If we cannot ensure protection of high biodiversity before we start felling, we will not carry out the project.
---	--

Article 29 (3c): Protection of land with high biodiversity value

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

(c) areas designated:

(i) by law or by the relevant competent authority for nature protection purposes; or

(ii) for the protection of rare, threatened or endangered ecosystems or species recognised by international agreements or included in lists drawn up by intergovernmental organisations or the International Union for the Conservation of Nature, subject to their recognition in accordance with the first subparagraph of Article 30(4), unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.

(i)

Description of a management system process to meet the requirement.

Before the task starts, areas are screened for compliance with relevant legislation, such as the Forest Act, the Nature Protection Act, and internationally protected areas, e.g. Natura 2000 areas - which protect these areas. (BEK no. 495 of 16/05/2025 chp 4.3.1) Areas of this type will often be protected by the National Forest Act or designated as a Natura 2000 area. When we produce biomass in these areas, we ask the relevant local authorities before we start the task, as a permit or exemption is often required. The procedure is described in the contractor handbook (entreprenørhåndbogen.)

Article 29 (3d): Protection of land with high biodiversity value

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

(c) *highly biodiverse grassland spanning more than one hectare that is:*

- (i) *natural, namely grassland that would remain grassland in the absence of human intervention and that maintains the natural species composition and ecological characteristics and processes; or*
- (ii) *non-natural, namely grassland that would cease to be grassland in the absence of human intervention and that is species-rich and not degraded and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the harvesting of the raw material is necessary to preserve its status as highly biodiverse grassland.*

Description of a management system process to meet the requirement.	Not relevant to the activities we do.
---	---------------------------------------

Article 29 (3e): Protection of land with high biodiversity value

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:(e) *heathland – Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).*

Description of a management system process to meet the requirement.	Areas of this type will often be protected by the National Forest Act or designated as a Natura 2000 area. When we produce biomass in these areas, we ask the relevant local authorities before we start the task, as a permit or exemption is often required. The procedure is described in the contractor handbook (entreprenørhåndbogen.)
---	--

Article 29 (4a): Protection of land with high carbon stock

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:

(a) *wetlands, namely land that is covered with or saturated by water permanently or for a significant part of the year;*

This paragraph shall not apply if, at the time the raw material was obtained, the land had the same status as it had in January 2008.

Description of a management system process to meet the requirement.	Areas of this type will often be protected by the National Forest Act or designated as a Natura 2000 area. When we produce biomass in these areas, we ask the relevant local authorities before we start the task, as a permit or exemption is often required. The procedure is described in the contractor handbook (entreprenørhåndbogen.)
---	--

Article 29 (4b): Protection of land with high carbon stock

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:

(b) *continuously forested areas, namely land spanning more than one hectare with trees higher than five metres and a*

canopy cover of more than 30 %, or trees able to reach those thresholds in situ;

This paragraph shall not apply if, at the time the raw material was obtained, the land had the same status as it had in January 2008.

Description of a management system process to meet the requirement.	Before the task starts, areas are screened for compliance with relevant legislation, such as the Forest Act, the Nature Protection Act, and internationally protected areas, e.g. Natura 2000 areas - which protect these areas. (BEK no. 495 of 16/05/2025 chp 4.3.1)
---	--

Article 29 (4c): Protection of land with high carbon stock

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:

- (c) *land spanning more than one hectare with trees higher than five metres and a canopy cover of between 10 % and 30 %, or trees able to reach those thresholds in situ, unless evidence is provided that the carbon stock of the area before and after conversion is such that, when the methodology laid down in Part C of Annex V is applied, the conditions laid down in paragraph 10 of this Article would be fulfilled.*

This paragraph shall not apply if, at the time the raw material was obtained, the land had the same status as it had in January 2008.

Description of a management system process to meet the requirement.	Before the task starts, areas with agricultural biomass - willow and poplar - are screened. The status of the area as of January 2008 is examined and documented on the task. JF. entreprenørhåndbog
---	---

Article 29 (5): Protection of peatland

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was peatland in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.

Description of a management system process to meet the requirement.	Before the task starts, areas with agricultural biomass - willow and poplar - are screened. The status of the area as of January 2008 is examined and documented on the task. JF. entreprenørhåndbog
---	---

Annex 4a: RED II detailed findings for Trees Outside Forest (TOF) feedstock

NOTE: For “Trees outside forests (TOF) – Urban and landscape feedstock” no REDII sustainability requirements apply, only the GHG savings criteria apply (SBP REDII Bridging ID Section 4.2). The land use category in this case is neither forest land nor agricultural land. For “Trees outside forests (TOF) – Agricultural land feedstock” the applicable criteria are Article 29 paragraphs (2)-(5).