Compliance with the SBP Framework: Public Summary Report

Control Union Certifications BV Evaluation of Duferco Biomasse Srl

Second Surveillance Audit

Sustainable Biomass Program
sbp-cert.org



Completed in accordance with the CB Public Summary Report Template Version 2.1 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

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1 Overview

Certification Body (CB) Name:	Control Union Certifications BV
Primary CB contact for SBP:	Lukasz Dabrowski
Primary CB contact email:	ldabrowski@controlunion.com
Audit team leader:	Henrique Silva
Audit team members:	-
Name of the Company:	Duferco Biomasse Srl
Company legal address:	Via Paolo Imperiale n. 4, 16126 Genova, Italy
Company contact for SBP:	Luca Poli
Company contact email:	l.poli@dufercobiomasse.com
Company website:	www.dufercobiomasse.com
Date of installation:	
SBP Certificate Code:	SBP-06-26
Date of certificate issue:	18 Apr 2024
Date of certificate expiry:	17 Apr 2029
Audit closing meeting date:	23 Apr 2026
Audit cycle:	Second Surveillance Audit

2 Audit conclusions

2.1 Certification decision

Based on the auditor's recommendation and the Certification Body's technical review, the following certification decision is taken:	
Certification decision:	Certification approved
Certification decision by (name of the person):	Robin Rosendahl
Date of decision:	09 Jun 2026
Other comments:	N/A

2.2 Open non-conformities and observations

2.2 Closed non-conformities

2.3 Actions taken by Organisation Prior to Report Finalisation

N/A

2.4 Notes for the next Audit

N/A

3 Scope of the audit and SBP certificate

Scope item	Check all that apply to the Certificate scope
Primary activity	Biomass Producer
Secondary activity	Trader
Approved Standards	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
Product Group IDs	☒ Forest feedstock (1A) ☒ Trees outside forest (TOF) - Urban and landscape feedstock (2A) ☒ Trees outside forest (TOF) - Agricultural land feedstock (3A) ☐ Processing residues feedstock (4A) ☐ Post-consumer feedstock (5A) ☐ Other (please specify)
SBP Feedstock types	☒ SBP Compliant; ☒ SBP Controlled
Includes Supply Base Evaluation (SBE)	Yes
Includes EU RED Scheme	Yes
Includes EU RED Supply Base Evaluation (SBE)	Yes
Products	WB 2.1 Wood chips, WB 1.1 Wood pellets
Feedstock origin (countries):	Spain, Italy
SBP-endorsed Regional Risk Assessments used: **Public link:** https://sbp-cert.org/documents/standards-documents/risk-assessments/	Not applicable
Chain of custody system	☐ Physical separation ☒ Mass balance
Outsourcing	Yes
Changes in the scope	In Italy three regions were added Emilia-Romagna, Lombardy, Veneto (forests + TOF) , also the port of Almeria was added.

3.1 Description of the company

Guidance: Please describe the type, structure and operations of the company including its role in the supply chain, its inputs and outputs as they related to SBP Standards.

Duferco Biomasse srl is part of the Duferco Goup from Genova (Italy) and deals with woodchips, pellets and timber logs as a trader, and woodchips as a producer in Spain and Italy; Duferco Biomasse also trades agricultural woody residues and forestry residues. The strategy of the company is extending trading to new products and markets, within the woody products. In Europe Duferco Biomasse has set up operations in Italy, Spain, Portugal, France and Belgium to enable them to control the flow from forest and agricultural land all the way to the end user premises. The physical separation system is used to manage any Chain of Custody. Duferco Biomasse is PEFC, FSC, ISCC and ISO certified. A managing program runs the transport documents and invoices and lot documentation is collected as evidence of compliance to legislation and certification requirements.

3.2 Site details

Legal entity name	Address	Site Activity	Visited during the audit
Duferco SRL	Genova	Head office	☒
Port of Palamós	Palamós	Port for loading	☐
Port of Tarragona	Tarragona	Port for loading	☐
Port of Alicante	Alicante	Port for loading	☐
Port of Huelva	Huelva	Port for loading	☐
Port of Cartagena	Cartagena	Port for loading	☐
Port of Castellón de la Plana	Castellón de la Plana	Port for loading	☐
Port of La Rapita (Alcanar)	Alcanar	Port for loading	☐
Port of Càdiz	Càdiz	Port for loading	☐
Port of Brindisi	Brindisi	Port for loading	☐
Port of Livorno	Livorno	Port for loading	☐
Port of Civitavecchia	Civitavecchia	Port for loading	☐
Port of Aveiro	Aveiro	Port for loading	☐
Port of Gent	Gent	Port for loading	☐

Port of Oostende	Oostende	Port for loading	☐
Port of Almeria	Almeria	Port for loading	☐

3.3 Detailed description of the Chain of Custody system and Product Groups

Guidance: Please describe the operation of the CoC system including details of the mass balance management and a list of established Product Groups.

In Spain feedstock is sourced from forests within the six Regions of the Supply Base, that are: Aragon, Catalunya, Comunidad Valenciana, Murcia, Andalucia, Castilla-La Mancha and it is bought from suppliers that collect standing trees lots from land owners/managers in the Supply Base, then fell the trees (from forests and TOF sites). Timber is then chipped and transported to one of the port facilities in Spain, from where woodchips are then shipped by vessels to the recipient. In the Regions of Italy, feedstock (coming from forests and TOF) is bought from suppliers that collect standing trees lots from land owners/managers in the Supply Base, then fell the trees. SBE was completed for the following Regions of Italy: Tuscany, Lazio, Emilia-Romagna, Lombardy, Veneto (forests + TOF) and Apulia (only TOF). SBP-controlled feedstock may come form the other Regions of Northern and Central Italy plus Sardinia. Timber is then chipped and transported either to the power plants or to the port facilities, where woodchips are then shipped by vessels to the recipient. Only in Apulia Region of Italy, feedstock is only TOF coming from agricultural land (dead olive trees) and comes from a single supplier that collects standing trees lots from land owners in Apulia: the trees are then eradicated, chipped and wood chips are transported to the port facility in Brindisi, where they are then shipped by vessels to the recipient.

4 Specific objective of the audit

The specific objective of this evaluation was a survaillance audit to confirm that the Biomass Producer's management system is capable of ensuring that all applicable requirements of SBP standards V2 and RED III in Forest feedstock , since three regions have been added, the field visits were based on it. The scope of this evaluation also covered the Supply Base Evaluation, and the mitigation measures described in the Italy and Spain SBE.

The scope of the evaluation covered:

- Review of the BP's management procedures, including requirements designated in applicable SBP Standards and Instruction Documents;
- Review of the production processes, and production site visit;
- Review of the updated Supply Base Report;
- Review REDIII requirements for SBE forest feedstock and TOF
- Review of the risk assessment results;
- Review of SBP system control points, analysis of the existing PEFC CoC system;
- Evaluation of mitigation measures implemented for primary feedstock (including inspection of primary feedstock suppliers);
- Review of the records, calculations and conversion factors;
- GHG data collection analysis - Interviews with responsible staff;
- Review of the records

5 Evaluation process

5.1 Timing and duration of evaluation activities

Audit Level of Effort (LoE)		
Activity	**Auditors**	**Auditor hours**
1. Preparation	Henrique Silva	2.0
2. On-site (excl. travel time)	Henrique Silva	32.0
3. Report writing	Henrique Silva	4.0

5.2 Auditor team qualification

Auditor qualification		
Auditor name	**Role**	**Qualification**
Henrique Silva	Lead Auditor	FSC,PEFC,SBP,SURE,GGL and ENPlus lead auditor

5.3 Description of evaluation activities

The specific objective of this evaluation was to confirm that the organization's process is compliant with RED III requirements.
In April 2026, it was confirmed that the Biomass Producer’s management system is capable of ensuring that all requirements of the specified SBP Standards are implemented across the entire scope of certification. The scope of this evaluation also covered the Supply Base Evaluation and the mitigation measures described herein.

The scope of the evaluation covered:
SBP S1: Feedstock Compliance Standard V2.0
SBP S2: Feedstock Verification V2.0
SBP S4: Chain of Custody V2.0
SBP S5: Collection and Communication of Data V2.0
SBP S5E: collection and Communication of Energy and Carbon data V2.1
RED III directive requirements

5.4 List of forest management units and feedstock suppliers visited

☐ N/A – No forest sites or suppliers visited during this evaluation

Site name
Cerea-Loc. Santa Teresa (VR)-Bazzi Ileana-PAN26D (DUF-019/26)

Site location
Emilia-Romagna
Site description
Forest operations with contractors, thinings done acording the permit avaiable
Rationale and focus of visit
Verifiy the opertaions, evaluation reports for EU RED compliant
Description of audit activity
During the visit the supplier present the team the working process of the operations and how they comunicate with the certificate holder in order to evaluate the the presence of especified risks.

Site name
Dosolo-Loc. Cavallara (MN)-S. A. FRATI LUIGI E C. S.S.-E21 (DUF-026/26)
Site location
Lombardy
Site description
Poplar Plantation with residues used to biomass
Rationale and focus of visit
Verifiy the opertaions, evaluation reports for EU RED compliant
Description of audit activity
During the visit the supplier present the team the working process of the operations and how they comunicate with the certificate holder in order to evaluate the the presence of especified risks.

Site name
Grizzana Morandi-Loc. Traversedola (BO)-Azienda agricola Zagnoni Felice di Carla e Loretta-FON25B
Site location
LOT MALFERRA 2026
Site description
conifers cut with low quality wood use for energy
Rationale and focus of visit
Verifiy the opertaions, evaluation reports for EU RED complian
Description of audit activity
During the visit the supplier present the team the working process of the operations and how they comunicate with the certificate holder in order to evaluate the the presence of especified risks.

Site name
Piacenza-Loc. Mortizza-Via della Finarda-Az. Agr. Parmigiani di Parmigiani Angelo e Giovanna S.S.A.-E18 (DUF-007/26)

Site location
LOT DOSOLO 2026
Site description
Poplar plantation, stumps stay on the the land, only residues in use
Rationale and focus of visit
Verifiy the opertaions, evaluation reports for EU RED compliant
Description of audit activity
The operations were dicussed, campring the permits to the place and the oerations done. The risk evaluation was also inspected

Site name
Vernio-Loc. Malferra (PO)-Azienda Agroforestale Le Fontanelle-FON26A
Site location
Veneto
Site description
Replacement of old orchards of various varieties where the biomass is shredded and used for energy
Rationale and focus of visit
Verifiy the opertaions, evaluation reports for EU RED compliant
Description of audit activity
The operations were dicussed, campring the permits to the place and the oerations done. The risk evaluation was also inspected

Site name
Castiglione dei Pepoli-Monte Casciaio (BO)-Azienda Agroforestale Le Fontanelle-FON26B
Site location
LOT BUTTELLI 2026
Site description
Clear cut from fagus sylvatica with some remaing trees left because.
Rationale and focus of visit
Verifiy the opertaions, evaluation reports for EU RED compliant
Description of audit activity
The operations were dicussed, campring the permits to the place and the oerations done. The risk evaluation was also inspected. Only residues in use like the photos

Site name
RS1C
Site location

olive orchards in Villa Preselle, Loc. Preselle, Scansano, Prov. Grosseto, Italy
Site description
Olive Orchad with interventions of thinnings and prunings, that feedstock was chipped
Rationale and focus of visit
Verifiy the opertaions, evaluation reports for EU RED compliant
Description of audit activity
The operations were dicussed, campring the permits to the place and the oerations done. The risk evaluation was also inspected

5.5 Describe audit sampling methodology used

During audit preparation, a sampling plan was developed based on the following criteria: - A review of documentation related to energy and carbon data for the chosen SAR reporting period. – An assessment of the DTS. – Inspection at the biomass production sites and interviews with the team. As surveillance audit with scope change the visits were focus on the areas of Emilia-Romagna, Lombardy, Veneto (forests + TOF) .In this period 93 sites were used to shearch feedstock and form those in the new regions 6 were inspected (√93*0.6 (6)) Seven were visited The new port was not visited because there are no activity at hte moment and because of that that is not allowed , the ports of Civitavecchia was inscpeted in October 2025 and Livorno in March of 2025.

5.6 CB stakeholder engagement

☐ N/A – Certification Body stakeholder consultation not applicable for this evaluation

Guidance: Please specify the number and types of stakeholders engaged, method of engagement and its outcomes.

In this period a public consultation was made to introduce the three new regions in Italy

5.7 Stakeholder feedback and response

☐ N/A – Certification Body stakeholder consultation not applicable for this evaluation

No feedback was received

5.8 Main strengths and weaknesses of the management system and operations

Strengths: The audit of Duferco demonstrated a good level of compliance with the required criteria of Standard 1, 2, 4 and 5. There was reasonable evidence provided to support compliance, the inclusion of TOF and SBE for Lazio Region was sucessefull verified. The existence of a FSC and PEFC Chain of Custody system is considered a main strength with respect to Duferco´s overall conformity with the relevant SBP standards. The company is also ISO9001, 14001 and 45001 certified.
Furthermore, Duferco developed a robust set of Mitigation Measures for compliance with the SBE.

5.9 Summary of evaluation activities for robustness of the Supply Base Evaluation

☐ N/A – Standard 1 not in the scope of the evaluation

Duferco is a biomass producer located in Italy, that performs also forest wrks in Spain, also through suppliers. The Supply Base, as defined by Duferco, covers the following Spanish Autonomous Communities:

1. Aragon
2. Catalunya
3. Castilla-La Mancha
4. Valencian Community
5. Murcia
6. Andalusia
7. TOF (agriculture)for all the regions of SPAIN

In Italy the scope involved six Communities with SBE (Forest and TOF Agriculture and landscape):

1. Apulia (only TOF Agriculture feedstock)
2. Tuscany
3. Lazio
4. Emilia-Romagna
5. Lombardy
6. Veneto

For SBP controled some regions are included in the RED III SBE:
Italy, Northern and Central Regions + Sardinia, without SBE (sourcing SBP-controlled feedstock), including the Regions: Piedmont, Aosta Valley, Liguria, Lombardy, Emilia-Romagna, Veneto, Trentino-Alto Adige, Friuli Venezia-Giulia, Tuscany, Marche, Umbria, Lazio, Abruzzo, Molise and Sardinia.

This SBE uses credible data sources. Duferco management and monitoring systems are designed to ensure compliance with applicable laws and regulations. Risk was designated low for all core Indicators, with the exception of 8 Indicators which were designated as specified risk. Duferco has developed additional controls and mitigation measures to manage these risks. After the risk assessment was completed, mitigation measures were proposed and consulted with stakeholders. The stakeholder consultation process involved consultations to key stakeholders with regard to information on SBP certification, SBP risk assessment and supply base report, by communicating this via electronic email. As no comments were received, the organization has implemented the mitigation measures for the specified risk indicators. The risk mitigation measures have been designed and implemented planned in cooperation with acknowledged experts and external consultants in relevant fields.

For TOF as described in the instruction document 1A all the specified risks evaluated on the SBE for that region have been evaluated for TOF if applicable.

5.10 Summary of evaluation activities for Processing residues and/or Post-consumer feedstock requirements per Standard 2 and EU RED

☒ N/A – processing residues and/or post-consumer feedstock not used.

5.11 Summary of evaluation activities for chain of custody system per Standard 4

The DTS was evaluated and all the transation are in place.
The existence of a FSC and PEFC Chain of Custody system is considered a main strength with respect to Duferco´s overall conformity with the relevant SBP standard.

5.12 Summary of evaluation activities for collection and communication of data per Standard 5

The organization has in-depth procedures for this. The auditor confirmed the Greenhouse Gas (GHG) sources for feedstock input from the forest, production at the facility, transportation to the port and storage and handling at the port and reviewed how the input data was measured. Findings were substantiated by on-site staff interviews with operations personnel on the overview of the operations at the facility, historical operations, changes to operations, procedures and processes used to maintain the facility, and procedures and processes used to ensure data quality. Duferco demonstrated full competency to analyze and report the required data on Greenhouse Gas emissions

5.13 Summary of audit findings for competency of involved personnel

Internal staff members and one external consultant are involved in the SBP system management and implementation. All interviewed responsible staff demonstrated awareness of their responsibilities within SBP system. The external Consultant who is contracted for forest matters, which includes sourcing the forest based material and field visits and reports for SBP Std.1.
All involved personnel, including responsible staff at suppliers and sub-suppliers have demonstrated good knowledge in relevant fields (recognition and identification of HCVF, familiarity with health and safety requirements, timber origin verification) during the site visits. Relevant certificates and diplomas were presented during the assessment and scope change audits.
Qualification requirements for personnel involved in the SBE system are provided in documented procedures of the BP. In overall, auditors evaluate the competency of main responsible staff to be sufficient for implementing the SBP system with both primary and secondary material sourced within the SBE.
This has been based on interviews, a review of qualification documents, training records and set of procedures and documents that were composed for the SBP system as well as field observations during the assessment and audits. It is important to understand that the suppliers have a good knowledge of forestry, silviculture and certification. During the field visits was observed that the suppliers have forestry engineers working or the organizations management are composed by foresters.

5.14 Summary of audit findings for GHG methodology per Standard 6 (if applicable)

☒ N/A – Standard 6 not in the scope

6 Detailed evaluation of BP's Supply Base Evaluation (if applicable)

☐ N/A – Supply Base Evaluation not in the scope of the evaluation

6.1 Overview of BP's risk assessments and mitigation measures including EU RED scope

During the inspection was verified in the suppliers all the requirements in the organization's risk assessment. All the mitigation measures available in the SBR were considered and inspected in the audit and field visits.

6.2 CB evaluation of specified risk indicators and mitigation measures

Country
Spain
Area/Sub-Scope
Areas described on the SBR
Indicator
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.
Specified risk description
Many Nature 2000 sites in Spain cover forested land, meaning that threats and impacts to biodiversity and HCV issues may happen and mitigation measures have to be implemented when sourcing from these areas. Information are widely available on high conservation values in the GIS viewers of the Autonomous Communities (Natura 2000 Network, Protected Areas, Sites of Cultural Interest), meaning that evaluation can be done by forestry engineers that supervise works in the forests/TOF lots.
Detailed description of a mitigation measure
Duferco and its suppliers has implemented appropriate control systems and procedures to ensure that key ecosystems and habitats are conserved: -Manual of good environmental practices in Sustainable Forest Management -Field visits (before and during felling works or TOF sourcing) -When Duferco buys timber from suppliers, it obliges the supplier to apply good environmental practices.
Detailed description of CB evaluation of mitigation measure and its conclusions
During the audit it was observed that the suppliers have experient forest engeniers leading the company, the certificate holder have also two consultants experts on sustainability and forestry opertations. The risk evaluation and mitigation measures are comaplaiant and efective with the opertaions.

Country
Spain
Area/Sub-Scope
Areas described on the SBR

Indicator
2.2.1 Feedstock shall not be sourced from land that had one of the following statuses in January 2008 and no longer has that status due to land conversion: a. Forests b. Wetlands c. Peatlands d. Highly biodiverse grasslands.
Specified risk description
Land conversion may be possible in some forests under specific regulations in Spain.
Detailed description of a mitigation measure
Checkings have to be made lot by lot through satellite images interpretation of past years, back to 2008, as to assess wheter the land was forest in 2008 and it is no longer (for instance it is now a poplar plantation or agricultural land with scattered trees).
Detailed description of CB evaluation of mitigation measure and its conclusions
During the audit it was observed that the suppliers have experient forest engeniers leading the company, the certificate holder have also two consultants experts on sustainability and forestry opertations. The risk evaluation and mitigation measures are comaplaiant and efective with the opertaions.

Country
Spain
Area/Sub-Scope
Areas described on the SBR
Indicator
2.2.2 Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.
Specified risk description
Possible interference of felling activities/TOF sourcing with ecosystems functions and services may occur.
Detailed description of a mitigation measure
A visit on the field and technical evaluation by forestry engineer is performed before starting the wood sourcing as well as at the end of the work.
Detailed description of CB evaluation of mitigation measure and its conclusions
During the audit it was observed that the suppliers have experient forest engeniers leading the company, the certificate holder have also two consultants experts on sustainability and forestry opertations. The risk evaluation and mitigation measures are comaplaiant and efective with the opertaions.

Country
Spain
Area/Sub-Scope

Areas described on the SBR
Indicator
2.2.3 Soil quality in the Supply Base shall be maintained or enhanced
Specified risk description
According to the information in place, it can be established that the forestry maintenance operations in forest stands or plantations do not damage the soil significantly and that, within the framework of sustainable forest management and with appropriate environmental and forest management procedures, No significant damage to the soil is to be expected. However, mountain areas which cover a part of the supply base require a special attention in terms of erosion, that's why the BP undertakes number of specific measures to be sure that minimum impact is due to forestry operation. All evidence is recorded in a proper form. Same applies to TOF sourcing when entire trees are removed; it does not apply to pruning.
Detailed description of a mitigation measure
During the audit it was observed that the suppliers have experient forest engeniers leading the company, the certificate holder have also two consultants experts on sustainability and forestry opertations. The risk evaluation and mitigation measures are comaplaiant and efective with the opertaions.
Detailed description of CB evaluation of mitigation measure and its conclusions
Duferco and its suppliers only harvest timber from thinnings authorized from the forest authority, meaning that the forest engineer of the Forest authority made a preliminary visit to the forest to verify that key ecosystems and habitats were conserved and, if necessary, prescribed specific protective measures. There are contracts with suppliers, that obligate them to give Duferco a copy of the felling licence and also to perform works according to the manuals of good practices in sustainable forest management, with integrate measures to take care of soil quality. It means that soil quality in the supply base is maintained or enhanced: harvesting is carried out in a way that aims at least at preventing negative impacts on soil quality, as the relevant risks associated with forest biomass harvesting are identified in advance.

Country
Spain
Area/Sub-Scope
Areas described on the SBR
Indicator
2.2.5 Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.
Specified risk description
Quantity of ground water may be affected by forestry operations following drought, as forestry vehicles may impact on soil and temporarily waterproof it.
Detailed description of a mitigation measure

Following the national and regional law and the authorization process requirements, these aspects areevaluated and rules are normally issued within the felling licence details, if applicable to the case. Field visits during and after the field work check the impact on water regulation in the field.
Detailed description of CB evaluation of mitigation measure and its conclusions
During the audit it was observed that the suppliers have experient forest engeniers leading the company, the certificate holder have also two consultants experts on sustainability and forestry opertations. The risk evaluation and mitigation measures are comaplaiant and efective with the opertaions.

Country
Spain
Area/Sub-Scope
Areas described on the SBR
Indicator
2.2.10 Harvested areas shall be regenerated
Specified risk description
As there is no specific enforced law about replantation for eucalyptus stands at the end of the cycle, there might be eucalyptus stands that are not re-planted at the end of the cycle.
Detailed description of a mitigation measure
As there is no specific enforced law about replantation for eucalyptus stands at the end of the cycle, there might be eucalyptus stands that are not re-planted at the end of the cycle.
Detailed description of CB evaluation of mitigation measure and its conclusions
Duferco assures that a proper commitment by the land owner will be signed in the few cases where replantation is not assured.

Country
Spain
Area/Sub-Scope
Areas described on the SBR
Indicator
2.2.11 The impacts of natural processes such as fires, pests and diseases shall be managed.
Specified risk description
With regards pests and diseases, Duferco relies on the existence of a clear, regulatory framework,action plans and data monitoring networks, and competent administrations responsible for data management and control. Therefore, it is generally considered that there is adequate pest and disease management in place, bearing in mind that a large part of the responsibility in this regard lies with public administrations. With regards forest fires, it cannot be denied that that they

currently represent one of the greatest threats to forests in Spain. Between 1990 and 2010, the annual average number of forest fires was 17,864, with a maximum of 25,557 in 1995. During the same period, the annual average area burned was 139,775 ha, of which approximately 51,000 ha were forested areas, and 88,000 ha were areas without trees. Climate change is expected to affect, and probably already does affect, the susceptibility of forests to disturbances, as well as the frequency, intensity, duration and timing of these disturbances. For example, there may be increased fuel accumulation in forests, the fire seasons may last for longer and more extreme weather conditions may occur more frequently. In addition, the frequency and intensity of forest fires is also expected to increase. The current trend is for forests to offer an increasingly dangerous vegetation structure in this regard, as they accumulate the fine biomass that was once used to cover livestock feed and heating requirements, and have a greater spatial continuity of forest fuel, taking into account the vegetation being installed in previously ploughed fields. The data for 2017 indicates that the total number of incidents has increased by 11.57% compared to the average for the last decade, with an increase of 5.80 % in the number of outbreaks (area ≤1 ha) and 23.05 % in the number of fires (area > 1 ha) respectively. It was the year with the third highest number of iincidents of the last decade. According to the provisional statistics provided by the competent services of the regional administrations, in 2017 there were 56 Major Forest Fires (MFFs), a category that includes fires exceeding 500 hectares of forest affected. In total the registered MFFs accounted for 54.96% of the total area affected and 0.41% of the total number of incidents. Northwest Spain was the area hit hardest by MFFs, with 73.21% of them taking place there and 74.54% of the area burned by them. In October alone, there were 31 MFFs (55% of the annual total), all in the Northwest region. According to the data, it seems that the recurrence of catastrophic years in terms of fires in Spain, is about every 5 years, the last two being 2012 (which affected Castilla y León and the Valencian Community in particular) and 2017 (which affected the Northwest of the peninsula in particular: Galicia, Asturias, León). At management level, a large extent of the responsibility for forest fires lies with public administrations. However, forest owners have certain responsibilities for the proper management of the forest and of fire prevention and defence infrastructures. The analysis of this indicator will focus on these issues, resulting from forestry operations. On forests management level we can make next classification: -Public forests. The administration itself is the manager of these forests and is therefore responsible for maintaining adequate defence and prevention infrastructure. In this respect, the level of implementation of these infrastructures can be considered adequate. -Private forests. The existing legislation determines specific obligations or responsibilities of forest managers/owners concerning prevention/defence against forest fires. In Andalucia the law requires the preparation of Forest Fire Prevention Plans or Management Plans and the implementation of the prevention/defence measures established either in this document or in the Plans drawn up by the administration. In Aragon the Forest management covers a total forest area of 2.5 million hectares, representing 53% of the area of the Autonomous Community of Aragon. There is high priority for forest fires. The forestry administration produces the statement of the High Risk Areas. The time of danger of forest fires is established for the year 2019 during the period from 1 April to 15 October. In Catalunya, a large part of the fire prevention activity is concentrated in the priority protection periods (PPP). The risk sectors or PPPs are territorial areas with a large forest fire peril and which, due to the continuity of the forest mass, may start fires that are converted into a large forest fire (GIF), defined here as more than 500 ha. The main objective is to plan the necessary measures in a territorial area that constitutes a unit of action broad enough to allow planning with an integral vision, so that the strategic prevention infrastructures for the whole are identified. The PPI is used as a basis for direct investment decisions that the Directorate General of the Natural Environment makes in the prevention of fires on the territory. In Castilla- la Mancha fire is an actual issue; the responsible organ is the Dirección General de Política y Espacios Naturales. In the Valencian Community the planning of the actions is carried out by the Generalitat Valenciana through the approval of forest fire sectoral plans and the possibility for municipalities to draw up local fire plans, subject to the sectoral plans. Forest land owners and local entities in areas at high risk of forest fires shall be obliged to adopt appropriate measures to prevent forest fires and shall carry out, at their own cost, the corresponding work in the manner, within the time limits and under the conditions established in the fire prevention plans. In Murcia, the forestry administration produces the statement of the High Risk Areas, as well as approving the defence plans. These plans shall establish the preventive work to be carried out, including the appropriate forestry treatments, firebreak areas, access roads and water points to be carried out by the owners

of the forests in the area, the execution timeframes, and the methods for executing the work, depending on the legal status of the land, by means of treaties, agreements, temporary assignments of the land to the Administration, aid or grants or, where appropriate, subsidiary execution by the Administration. It is important to bear in mind that the work carried out by Duferco and its suppliers, which normally involves forest treatments, thinning and clearing, has a positive impact on the prevention of forest fires, as it reduces the density and biomass in the forest cover. In fact, in many areas of the Valencian Community where work is being carried out, the impact of the work on the occurrence of forest fires has been very positive as the number has decreased significantly. In general, these were forest areas that had undergone virtually no forest management in the last 30-40 years. Duferco suppliers have implemented a Manual of good environmental practices, known to all its workers, which indicates the measures to be taken to prevent forest fires resulting from its work. Furthermore, based on the levels of risk determined by the public administration, at times of highrisk forestry work is not permitted in the area. The level of risk may be defined as: 1. Low risk for pest and disease management. 2. High risk for forest fires. However, during forest works the implementation of fire prevention measures by Duferco or the suppliers are standard operational procedures. If a pest or disease hits the forest, restrictions or measures are detailed in the felling licence. This means that impacts of natural processes such as fires, pests and diseases are managed.

Detailed description of a mitigation measure

Fire protection equipment are always present at the harvesting site is accordance with the legal requirements.
Harvesting work is performed at the time that is allowed and announced by the Department of fire prevention.
Manuals of good practices in sustainable forest management is applied

Detailed description of CB evaluation of mitigation measure and its conclusions

During the audit it was observed that the suppliers have experient forest engeniers leading the company, the certificate holder have also two consultants experts on sustainability and forestry opertations. The risk evaluation and mitigation measures are comaplaiant and efective with the opertaions.

Country

Spain

Area/Sub-Scope

Areas described on the SBR

Indicator

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).

Specified risk description

Feedstock may be sourced from areas that have both high carbon stocks and high conservation value (HCV). This may apply to forests and TOF lots.

Detailed description of a mitigation measure

Evidence is collected for each lot using GRAS database (matching Biodiversity maps and carbon stock maps).

Checklist and related documents are crosschecked by Duferco's sustainability team.

Detailed description of CB evaluation of mitigation measure and its conclusions

If a lot has got high carbon stocks and high conservation value (HCV), it may be cast as non-eligible for SBP certification, unless there is a justification in the felling licence or other authorization that allows the felling for specific reasons.

Country

Italy

Area/Sub-Scope

Tuscany, Lazio, Emilia-Romagna, Lombardy, Veneto

Indicator

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.

Specified risk description

Possible undetected interference with protected species, ecosystem or habitats may occur during felling operations/TOF sourcing.

Detailed description of a mitigation measure

Preliminary verification of the presence of protected areas or Nature 2000 sites and verification of the correctness of the authorization procedure.
Site inspection on the field and technical evaluation by forestry engineer has to be performed if forestry operations take place within the boundary of protected areas or Nature 2000 sites.
All lots are cross-checked and verified by Duferco. The technician fills out an inspection report in which the carrying out company declares that the intervention was carried out in compliance with the requirements and that the personnel in charge of the inspection did not detect any infringement.

Detailed description of CB evaluation of mitigation measure and its conclusions

Duferco has implemented a control systems for all works that consists of preliminary visits and field visits during the works, to verify that forest works are carried out properly. If some possible risk is detected, Duferco, also through its suppliers, implements mitigation measures and records them in the paperwork.

Country

Italy

Area/Sub-Scope

Tuscany, Lazio, Emilia-Romagna, Lombardy, Veneto

Indicator

2.2.1 Feedstock shall not be sourced from land that had one of the following statuses in January 2008 and no longer has that status due to land conversion: a. Forests b. Wetlands c. Peatlands d. Highly biodiverse grasslands.
Specified risk description
A felling licence may have been granted for a plot that was forest in January 2008 and then was deforested and re-forested afterwards.
Detailed description of a mitigation measure
Evidence is collected by analysis of the aerial photography.
Detailed description of CB evaluation of mitigation measure and its conclusions
During the audit it was observed that the suppliers have experient forest engeniers leading the company, the certificate holder have also two consultants experts on sustainability and forestry opertations. The risk evaluation and mitigation measures are comaplaiant and efective with the opertaions.

Country
Italy
Area/Sub-Scope
Tuscany, Lazio, Emilia-Romagna, Lombardy, Veneto
Indicator
2.2.2 Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.
Specified risk description
Possible interference may occur with ecosystems functions and services during forestry operations/TOF sourcing.
Detailed description of a mitigation measure
A visit on the field and technical evaluation by forestry engineer is performed before starting the wood sourcing as well as at the end of the work.
Detailed description of CB evaluation of mitigation measure and its conclusions
During the audit it was observed that the suppliers have experient forest engeniers leading the company, the certificate holder have also two consultants experts on sustainability and forestry opertations. The risk evaluation and mitigation measures are comaplaiant and efective with the opertaions.

Country
Italy
Area/Sub-Scope
TTuscany, Lazio, Emilia-Romagna, Lombardy, Veneto
Indicator

2.2.3 Soil quality in the Supply Base shall be maintained or enhanced
Specified risk description
Soil quality may be affected by forestry operations/TOF sourcing.
Detailed description of a mitigation measure
Duferco has implemented a control systems for all the forestry works that consists of preliminary visits and field visits during the forest works, to verify that forest works are carried out properly. The regional law and the authorization process requirements may issue rules about soil quality mantainance in the forests. Guidelines of the SKIDDFORW project detail rules about this and field visits are performed during and after the field work to check compliance to these guidelines.
Detailed description of CB evaluation of mitigation measure and its conclusions
During the audit it was observed that the suppliers have experient forest engeniers leading the company, the certificate holder have also two consultants experts on sustainability and forestry opertations. The risk evaluation and mitigation measures are comaplaiant and efective with the opertaions.

Country
Italy
Area/Sub-Scope
Tuscany, Lazio, Emilia-Romagna, Lombardy, Veneto
Indicator
2.2.5 Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.
Specified risk description
Quantity of ground water may be affected by works in the field, as forestry vehicles may impact on soil and temporarily waterproof it.
Detailed description of a mitigation measure
Following the national and regional law and the authorization process requirements, these aspects are evaluated and rules are normally issued within the felling licence details, if applicable to the case. Field visits during and after the field work check the impact on water regulation in the field.
Detailed description of CB evaluation of mitigation measure and its conclusions
During the audit it was observed that the suppliers have experient forest engeniers leading the company, the certificate holder have also two consultants experts on sustainability and forestry opertations. The risk evaluation and mitigation measures are comaplaiant and efective with the opertaions.

Country
Italy
Area/Sub-Scope
Tuscany, Lazio, Emilia-Romagna, Lombardy, Veneto
Indicator
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).
Specified risk description
Feedstock may be sourced from areas that have both high carbon stocks and high conservation value (HCV).
Detailed description of a mitigation measure
Evidence is collected for each lot using GRAS database (matching Biodiversity maps and carbon stock maps). Checklist and related documents are crosschecked by Duferco's sustainability team.
Detailed description of CB evaluation of mitigation measure and its conclusions
During the audit it was observed that the suppliers have experient forest engeniers leading the company, the certificate holder have also two consultants experts on sustainability and forestry opertations. The risk evaluation and mitigation measures are comaplaiant and efective with the opertaions.

Country
Italy
Area/Sub-Scope
Apulia
Indicator
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.
Specified risk description
Olive trees are the key species for a peculiar area of HCV pertaining to landscape, but there is also a peculiar biodiversity related to the olive trees orchards, mainly insects and other fauna that may benefit from shadow and availability of sites of refugee amongst the olive trees and the dry stone walls, that often surround each orchard. Monumental olive trees enhance these benefits, as they are old trees with multiple ecological niches, more than the young olive trees. Besides, a few Nature 2000 sites (for instance Site code IT9120002 and Site code 9130005) also cover part of agricultural land, where olive trees orchard can be found, meaning that threats to biodiversity issues in sourcing from these areas should be addressed and mitigation measures implemented.
Detailed description of a mitigation measure

A visit on the field and technical evaluation by agronomist has to be performed if olive trees are eradicated within the boundary of Nature 2000 sites, also in relation to re-planting issues and dry stone walls preservation.
Evidence is cross-checked and verified by Duferco's sustainability team.
After 2-3 years from eradication, a sample of these lots should be re-visited, to verify if replantation was carried on properly.

Detailed description of CB evaluation of mitigation measure and its conclusions

During the audit it was observed that the suppliers have experient forest engeniers leading the company, the certificate holder have also two consultants experts on sustainability and forestry opertations. The risk evaluation and mitigation measures are comaplaiant and efective with the opertaions.

Country

Italy

Area/Sub-Scope

Apulia

Indicator

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.

Specified risk description

A few hectars and plants belonging to private, small owners, that were infected and were eradicated, may not be re-planted, but, within the professional farmers' surfaces, the number of plants in replantations has been and will be increased, following the commitment of the Apulia Region that the number of olive trees plant will not decrease on provincial basis.

Detailed description of a mitigation measure

There is no interest whatsoever to diminish the surface of olive trees, even where infection is spreading. On the contrary, efforts at all levels, from the European Commission to the National governement to the Regional authority, have been made and are made in order to contrast the infection and recreate the lost surface by re-planting.
The practical measure that increases the density of plants in the new plantation and re-plantation, due to the evolution of cropping to an higher density layout of trees, works as a strong mitigation measure.

Detailed description of CB evaluation of mitigation measure and its conclusions

During the audit it was observed that the suppliers have experient forest engeniers leading the company, the certificate holder have also two consultants experts on sustainability and forestry opertations. The risk evaluation and mitigation measures are comaplaiant and efective with the opertaions.

Country

Italy

Area/Sub-Scope
Apulia
Indicator
2.2.1 Feedstock shall not be sourced from land that had one of the following statuses in January 2008 and no longer has that status due to land conversion: a. Forests b. Wetlands c. Peatlands d. Highly biodiverse grasslands.
Specified risk description
An olive tree orchard may have been planted in a plot that was forest in January 2008.Evidence is collected by analysis of the satellite images before 2008.
Detailed description of a mitigation measure
Proper Annex of a document filled in by Duferco's sutainability team with evidence of images interpretation
Detailed description of CB evaluation of mitigation measure and its conclusions
During the audit it was observed that the suppliers have experient forest engeniers leading the company, the certificate holder have also two consultants experts on sustainability and forestry opertations. The risk evaluation and mitigation measures are comaplaiant and efective with the opertaions.

Country
Italy
Area/Sub-Scope
Apulia
Indicator
2.2.2 Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.
Specified risk description
The infection of Xylella in Apulia has caused an unwanted decrease of Ecosystem Services within the infected orchards.
Detailed description of a mitigation measure
Replantation with resistant varieties and new plantations from other crops are indeed mitigation measures, as they restore and increase the number of plants per hectar, maintaining or enhancing in the long term the health, vitality, functions and services of the olive trees orchard agro-ecosystem. The practical measure that increases the density of plants in the new plantation and re-plantation, due to the evolution of cropping to an higher density layout of trees, works as a strong mitigation measure.
Detailed description of CB evaluation of mitigation measure and its conclusions

During the audit it was observed that the suppliers have experient forest engeniers leading the company, the certificate holder have also two consultants experts on sustainability and forestry opertations. The risk evaluation and mitigation measures are comaplaiant and efective with the opertaions.

Country
Italy
Area/Sub-Scope
Apulia
Indicator
2.2.3 Soil quality in the Supply Base shall be maintained or enhanced
Specified risk description
Soil quality is affected by eradication and also by harrowing in specific areas, as several scientific studies show.
Detailed description of a mitigation measure
Re-plantation compensates the loss of organic matter in the medium period and restores the protection of the soil by canopy cover. Early harrowing is then followed by grass cover that restores the protection of the soil at a lower level and also the content of organic matter.
Detailed description of CB evaluation of mitigation measure and its conclusions
During the audit it was observed that the suppliers have experient forest engeniers leading the company, the certificate holder have also two consultants experts on sustainability and forestry opertations. The risk evaluation and mitigation measures are comaplaiant and efective with the opertaions.

Country
Italy
Area/Sub-Scope
Apulia
Indicator
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.
Specified risk description
Since Xylella can affect roots, all parts of infected plants have to be removed, including stumps and roots.
Detailed description of a mitigation measure
It is not an irreversible negative impact, as new plants are re-planted in the lacking spots, often in higher density then before the eradication, due to new standards in

cropping. Organic manure is spread as a common practice in new planting, restoring some content of organic matter in the soil. The negative impact to the ecosystem is then reversible.
Detailed description of CB evaluation of mitigation measure and its conclusions
If re-plantation is not assured, the lot is cast as non-eligible for SBP certification.

Country
Italy
Area/Sub-Scope
Apulia
Indicator
2.2.5 Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.
Specified risk description
Quantity of ground water may be affected by eradication of olive trees, according to a recent scientific study.
Detailed description of a mitigation measure
Re-plantation and also irrigation of the new cultivar plantation (mostly “Leccino”) are becoming common, contrasting the lack of water in the soil during summer. There are grants for professional farmers that are given to implement irrigation (through the Rural Development Plan of Apulia Region, Submeasure 4.1.A).
Detailed description of CB evaluation of mitigation measure and its conclusions
During the audit it was observed that the suppliers have experient forest engeniers leading the company, the certificate holder have also two consultants experts on sustainability and forestry opertations. The risk evaluation and mitigation measures are comaplaiant and efective with the opertaions.

Country
Italy
Area/Sub-Scope
Apulia
Indicator
2.2.10 Harvested areas shall be regenerated
Specified risk description
A few hectars and plants belonging to private, small owners, that were infected and were eradicated, may not be re-planted, but, within the professional farmers’ surfaces, the number of plants in replantations has been and will be increased, following the commitment of the Apulia Region that the number of olive trees plant will not decrease on provincial basis
Detailed description of a mitigation measure

There is no interest whatsoever to diminish the surface of olive trees, even if infection is spreading.
On the contrary, efforts at all levels, from the European Commission to the National governement to the Regional authority, have been made and are made in order to contrast the infection and recreate the lost surface by re-planting.
The practical measure that increases the density of plants in the new plantation and re-plantation, due to the evolution of cropping to an higher density layout of trees, works as a strong mitigation measure.

Detailed description of CB evaluation of mitigation measure and its conclusions

During the audit it was observed that the suppliers have experient forest engeniers leading the company, the certificate holder have also two consultants experts on sustainability and forestry opertations. The risk evaluation and mitigation measures are comaplaiant and efective with the opertaions.

Country
Italy
Area/Sub-Scope
Apulia
Indicator
4.1.2 Forced or compulsory labour shall not be used.
Specified risk description
Illegal employment may be a form of forced labour, as illeagl workers have no rights. In agriculture in Apulia this problem may occur.
Detailed description of a mitigation measure
Duferco checks documents of legal employement related to workers of its suppliers
Detailed description of CB evaluation of mitigation measure and its conclusions
During the audit it was observed that the suppliers have experient forest engeniers leading the company, the certificate holder have also two consultants experts on sustainability and forestry opertations. The risk evaluation and mitigation measures are comaplaiant and efective with the opertaions.