Compliance with the SBP Framework: Public Summary Report

Preferred by Nature OÜ
Evaluation of Novalis Consultoría y Comercio S.L.

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

Version 2.0	**Published 10 August 2023**
Version 2.1	Published 21 May 2025

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1 Overview

Certification Body (CB) Name:	Preferred by Nature OÜ
Primary CB contact for SBP:	Pilar Gorria Serrano
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Audit team leader:	Lennart Holm
Audit team members:	ERROR: Works only for SBR or PSR form. Please alter the function by adding more tables, or by dynamic sql
Name of the Company:	Novalis Consultoría y Comercio S.L.
Company legal address:	Paseo de las Delicias nº 1, 41001 Sevilla, Spain
Company contact for SBP:	José Antonio Casado Alcaide
Company contact email:	jcasado@novaliscc.com
Company website:	http://novaliscc.com/es/inicio
Date of installation:	
SBP Certificate Code:	SBP-07-67
Date of certificate issue:	17 Mar 2025
Date of certificate expiry:	16 Mar 2030
Audit closing meeting date:	19 Jun 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):	Kersti Kuum
Date of decision:	02 Sep 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

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2.4 Notes for the next Audit

Verify mitigation implemented measures due to transition to V2.1.

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 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
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
Feedstock origin (countries):	Spain
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	-

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.

Novalis Consultoría y Comercio SL is a company dedicated to the production and marketing of wood and biomass for panels, cellulose, boards, and thermal and power energy. Novalis Consultoría y Comercio S.L., hereafter referred as BP (Biomass Producer) is a wood chips producer based in Spain and holds valid PEFC and FSC Chain of Custody certificate, covering production of wood chips. The BP use PEFC as the chain of custody applicable for SBP. The BP purchases all of its feedstock from Spanish regions - Andalucía, Valencia, Murcia, Asturias, Castilla León, Cantabria, País Vasco and Castilla la Mancha. Some share of incoming feedstock is sourced directly by the BP from forest and some part of the material is sourced from external suppliers in form of chips or roundwood. BP can buy wood as FSC or PEFC certified, but mainly relies on sourcing feedstock as SBP compliant from its own Supply Base Evaluation. BP is supplying the wood chips produced to ten harbours (Avilés, Santander, Sagunto, Alicante, Castellón, Cartagena, Tarragona, Almería, Cádiz, Sevilla, Puerto de Huelva (with intermediate warehouse MYCSA) where are either directly sold FOB Incoterms or transported to any European harbour and sold CIF. The BP purchases all its feedstock from Spain, some share of incoming feedstock is sourced directly by the BP from forest where the BP is doing the harvesting and chipping itself, and some part of the material is sourced from external supplier in form of chips or roundwood. The input material comes from public as well as private forests and are in form of branches, treetops, stem wood as well as roundwood from thinning and from final harvest. The BP is extracting the whole trees from the forest stand which also serves as an anti-fire measure as less fuel is left in the stands. On the other hand, the wood is left in the forest stand the maximum allowed time to decrease the moisture content. Chips are delivered to the harbours by trucks. The transport is organized in majority of the cases by the BP and only in case BP is sourcing chips from external supplier the transport is organized by the supplier who is providing all documents needed with the material. The BP is implementing PEFC credit system for the biomass and the PEFC Transfer system for the roundwood purchased and sold as such without transformation. For the biomass under credit system, the amount of PEFC feedstock is insignificant and the BP has implemented SBP supply base evaluation of the feedstock which is considered then as SBP compliant. All the feedstock sourced by the BP from the regions mentioned above is included in the scope of the SBE.

3.2 Site details

Legal entity name	Address	Site Activity	Visited during the audit
Novalis Consultoría y Comercio S.L.	Paseo de las Delicias nº 1, 41001 Sevilla, Spain	Biomass Producer	☒
PORT OF SEVILLA.	Carretera de la esclusa s/n 41011 Seville-Spain.	Temporary storage of woodchips	☒
PORT OF HUELVA.	Servicios Marítimos Aduaneros Huelva, S.L. Polígono Nuevo Puerto s/n. 21.810 Palos de la Frontera (Huelva) – Spain.	Temporary storage of woodchips	☒
MYCSA	MULDER CENTRALES DE BIOMASA	Logistic site-Temporary storage of woodchips	☒

	S.L. Crta. N-435. Km 219,8. 21610, San Juan del Puerto (Huelva) - Spain		
PORT OF ALMERÍA.	SALG López Guillén. Muelle de Ribera Poniente. 04002 Almería - Spain.	Temporary storage of woodchips	☒

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.

Novalis is holding both PEFC and FSC Chain of Custody certificates. The BP has implemented both physical separation and credit account method. The PEFC physical separation method was chosen as a relevant CoC system for SBP. The organization is implementing the SBE system for the non-certified PEFC or FSC material sourced. In case there would be any non-compliant material it would be kept physically separated in the harbour. The chips are stored in different harbours in Spain in open yards and is kept in different piles. The chipping is always done in the forest and transported by the trucks to the harbour. Each truck comes with a delivery note where the forest stand is indicated. The material is received by the BP responsible person, the delivery documents are checked and hand over to the office where these are paired with the supplier invoices.

4 Specific objective of the audit

The objective of this audit was to confirm that Novalis management system is capable of ensuring that all requirements of specified SBP Standards are implemented across the entire scope of certification. The scope of this evaluation also covered the Supply Base Evaluation and their mitigation measures as well as EU RED III requirements for primary feedstock.

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, production site visit; port visits
- Review of the updated Supply Base Report;
- 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 supplies);
- Review of the records and calculations;
- GHG data collection analysis
- Interviews with responsible staff;
- EU RED III bridging requirements for meeting EU RED III for primary feedstock
- Level B sustainability criteria for primary feedstock from Spain.

5 Evaluation process

5.1 Timing and duration of evaluation activities

Audit Level of Effort (LoE)		
Activity	**Auditors**	**Auditor hours**
1. Preparation	Lennart Holm	4.0
2. On-site (excl. travel time)	Lennart Holm	24.0
3. Report writing	Lennart Holm	8.0
4. Other	Lennart Holm	4.0

5.2 Auditor team qualification

Auditor qualification		
Auditor name	**Role**	**Qualification**
Lennart Holm	Lead auditor	Lennart has 25 years of auditing experience in Forest Management; Chain of Custody, SBP, GGL, Enplus and SDE+ audits, for various CBs. Lead SBP, ENplus, GGL, SDE+ and FSC, PEFC and SFI FM/COC auditor, as well as ISO9001 and ISO14001 lead auditor, and successfully passed the SBP auditor training program for V1 and V2.

5.3 Description of evaluation activities

This audit occurred between June 16 to June 19, of 2026. The audit was conducted on-site at Novalis office in Sevilla as well as visit to selected FMUs for verification of primary feedstock supplies under the SBE, located in Andalucía. The audit consisted of an opening meeting, during which the scope was confirmed. The auditor also explained the methods to be employed during the audit. During the audit, all relevant requirements of the applicable SBP standards were verified on compliance through the use of a report template and checklists, as well as interviews with the below mention individuals were made. Field visits to feedstock suppliers were done. Harvest sites for verification of mitigation measures was visited, see section 5.4 for details. During the site visits, responsible staff was interviewed to evaluate the production process and to determine the implementation of mitigation measures. Additionally, sample records of deliveries were verified to identify the possible supply base and to confirm it is within the declared ones.

A key part of the audit was the evaluation of the management system for STD 1 and EU RED III requirements; in this context, the auditor was evaluating how Novalis staff is doing audits for the primary feedstock supplies and evaluating their compliance with the SBP standards and how risk from the risk assessment is implemented on the ground. An evaluation of suppliers training program was made. The audit was completed by filling in the audit checklist and discussing the audit results.

This report is the result of the findings of an audit carried out by an independent lead auditor. The purpose of the assessment was to assess the client's compliance with the standards used within the scope of the certificate.

A sufficient amount of people were interviewed during the site and field visits, where names withheld due to Data Protection Legislation

Critical Control points were evaluated and found to be sufficiently well managed and controlled.

A closing meeting was conducted where auditor summarized audit conclusions and next steps where clarified.

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5.4 List of forest management units and feedstock suppliers visited

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

Site name
Santa Clara
Site location
Aroche
Site description
Concluded commercial thinning in a 10,47 ha eucalyptus stand where small diameter trees were removed for stand development. Public forest belonging to Junta da Andalucia. Harvest permit verified, leave tree characteristics evaluated. Only output was whole trees-biologs with tops and branches that were chipped for biomass
Rationale and focus of visit
Concluded harvest, verified protection of standing timber, implementation of mitigation measures and the cascading principle.
Description of audit activity
Public forest belonging to Junta da Andalucia. Harvest permit verified, leave tree characteristics evaluated. Interview with logging supervisor.

Site name
Gil Marques
Site location
Rosal de la Frontera
Site description

On-going final felling in a 27.65 ha eucalyptus leading stand with minor component of pinus pinea and pinus pinaster. Public forest belonging to Junta da Andalucia. Sawlogs separated to be sold to local sawmill, pulp logs separated to be sold to a pulpmill while biologs, tops and branches to be chipped for biomass.
Rationale and focus of visit
Ongoing harvest, verified protection of standing timber, implementation of mitigation measures and the cascading principle.
Description of audit activity
Public forest belonging to Junta da Andalucia. Harvest permit verified, leave tree characteristics evaluated. Interview with supervisor, workers and Junta da Andalucia technician.

Site name
Las Monteras
Site location
Villanueva del Rey
Site description
Concluded commercial thinning in a 159,07 ha pinus pinea stand. Public forest belonging to Junta da Andalucia. Quercus ilex and Quercus sober protected, logs from steep areas were extracted by winch for erosion control. Sawlogs were sold to local sawmill while tops and branches were chipped for biomass
Rationale and focus of visit
Concluded harvest, verified protection of standing timber, implementation of mitigation measures and the cascading principle.
Description of audit activity
Public forest belonging to Junta da Andalucia. Harvest permit verified, leave tree characteristics evaluated and and erosion control measures inspected. Interview with supervisor

Site name
El Conde
Site location
Bacares
Site description
On-going commercial thinning in a 305 ha pine stand where c:a 80 ha has been harvested so far of predominately Pinus sylvestris and Pinus laricio, of c:a 55 years. Public forest belonging to Junta da Andalucia. Sawlogs separated to be sold to local sawmill while tops and branches to be chipped for biomass.
Rationale and focus of visit
Ongoing harvest, verified protection of standing timber, implementation of mitigation measures and the cascading principle.
Description of audit activity
Public forest belonging to Junta da Andalucia. Harvest permit verified, leave tree characteristics evaluated with no signs of damaged trees. Chipping has not yet commenced. Interview with supervisor and workers.

Site name
Bodegones Cabezudos
Site location
Almonte
Site description
On-going commercial thinning in a 693,70 ha area spread out over 6 stands of Pinus pinea and pinus pinaster, where stand 6 of 132.28 ha was recently started. Public forest belonging to Junta da Andalucia. Sawlogs separated to be sold to local sawmill while tops and branches to be chipped for biomass.
Rationale and focus of visit
Ongoing harvest, verified protection of standing timber, implementation of mitigation measures and the cascading principle.
Description of audit activity
Public forest belonging to Junta da Andalucia. Harvest permit verified, leave tree characteristics evaluated with no signs of damaged trees. Chipping has not yet commenced. Interview with supervisor and workers.

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. – Inspection of field sites with on-going harvest to verify company procedures and implementation of mitigation measures. FMUs were selected based on the result of the square root of 14 x 0.6 = 3, although 5 FMUs were visited since the company had only activities on public forests, no private held FMUs were visited. Out of 10 ports in the scope, 4 ports were visited using the square root of 10 to calculate the sample. All applicable and existing documents and procedures subject to the applicable SBP requirements were reviewed. All relevant staff were interviewed

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.

Novalis conducted stakeholder engagement between May 15 to June 16 2026.

Novalis has a stakeholder engagement plan in place and, in accordance with the provisions of that plan, has made contacts arising from the update of the EU RED III annex in its Supply Base Evaluation (SBE), specifically regarding deadwood extraction and large clear-cuts thresholds.

Contacts have been done with consultancy companies, forest management auditors and forest enterprises in order to improve and develop arguments regarding the removal of deadwood and to validate the limit set at the threshold of large clear-cuts.

Furthermore, throughout the year, NOVALIS engages in numerous informal discussions with stakeholders and takes part in industry forums. Specifically, during this period, we can highlight our collaboration promoting the usages of biomass from the Regional Park of Sierra Espuña (Murcia), jointly with the Public Administration. As a result of this collaboration, this documental has been released in the past December 2025: https://www.youtube.com/watch?v=Gh07Ewecn-Q

5.7 Stakeholder feedback and response

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

No comments were received.

5.8 Main strengths and weaknesses of the management system and operations

Strengths: The audit of Novalis demonstrated a good level of compliance with the required criteria of Standards 1, 2, 4 and 5, and the EU RED requirements. There was reasonable evidence provided to support compliance where a Non-Conformity was not detected.

The existence of FSC and PEFC Chain of Custody system in combination with SURE are considered a main strength with respect to Novalis overall conformity with the relevant SBP standards.

Weaknesses: No weaknesses detected

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

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

The SBE was developed in joint efforts between internal personnel and a qualified consultant, using credible data sources. Novalis 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 5 Indicators which were designated as specified risk. Novalis 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 relevant comments were received on the proposed mitigation measures, Novalis has implemented the mitigation measures for the specified risk indicators as initially proposed. The risk mitigation measures have been designed and implemented planned in cooperation with acknowledged experts and external consultants in relevant fields. Currently Novalis is sourcing Forest primary feedstock from the Autonomous Communities of Andalusia (And.), Castilla-La Mancha (Cast.-Man.), Murcia Region (Mur.), Valencian Community (Val.), Galicia (Gal.), Asturias (Ast.), Cantabria (Cant.), Castilla y León (CyL) in Spain. , where the SBE is developed to comply with STD 1 and RED II requirements, thus RED II Level B is applied for Spain.

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

Novalis has implemented a physical separation system for biomass (wood chips) in the scope of the SBP certificate. Valid PEFC system description and other documents exist. As a biomass producer, they buy low grade logs, tops and branches and chip these at or near the harvest site. Each load is registered and a mass balance is set up to track the feedstock. All primary feedstock can be claimed as SBP Compliant biomass through the implementation of the SBE. They implement mass balance as material for SBP is physically separated as per Mass Balance requirement, thus a Mass Balance account is used for EU RED III and also Std 4 of SBP.

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

The BP has provided good overview of the requirements for energy data collection. The responsible person has benefited from previous experience with other certification schemes and the system for collection of energy data was partly developed already before the SBP certification.

5.13 Summary of audit findings for competency of involved personnel

Staff members involved into the SBP system management and implementation, include the external consultant, quality manager, supply raw materials responsible and industrial director as well as administrative staff. Interviewed staff demonstrated awareness of their responsibilities within SBP system. To conduct the risk analysis and implement the SBP certification process, Novalis assigned to an external consultant as well as the company's technical team, particularly Jose Antonio Casado Alcaide, technical manager with forest background and more than 20 years of experience in forest sector. External consultant is a Forestry Engineer with extensive experience (18 years) in forest planning, management, and certification. He has worked on processes related to forest certification in the Iberian Peninsula since 2009. He is FSC forest management auditor and FSC and PEFC Chain of Custody auditor as well. This external consultant supported Novalis with the RMM, SBE and mitigation measures development.

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

SBE produced for the Autonomous Communities of Andalusia (And.), Castilla-La Mancha (Cast.-Man.), Murcia Region (Mur.), Valencian Community (Val.), Galicia (Gal.), Asturias (Ast.), Cantabria (Cant.), Castilla y León (CyL) in Spain, where primary feedstock is sourced. Mitigation Measures were applied to avoid feedstock with Specified Risks and exclude it from SBP-Compliant Biomass. The auditor assessed the risk for each Indicator using the guidance in Section 11 of SBP Framework Standard 2: The risk assessment has been performed with the use of an external consultant. Determining the risk rating the likely impact of a non-compliance together with the probability of that noncompliance arising was used. and evaluated risk at both regional and the individual forest. The risk assessment identified 5 specified risk indicators, which need specific control systems or mitigations measures. For EU RED, Novalis details the legal situation and enforcement for each Indicator requested under article 29(6) for Spain. The management system consists of a defined list of actions or documents requested to all FMUs to evaluate the implementation at the forest level. During the operations evaluated during the audit, it was confirmed that all FMUs where Novalis source primary feedstock from, are always evaluated prior to harvesting activities commence. The management system was evaluated during the audit on sampled FMUs.

Out of the 42 indicators in Annex 1 of the risk analysis, 37 have been identified as low risk and the following 5 have been identified as 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.

Based on evidence from the Article 17 reports of the Habitats Directive 92/43/EEC (six-year period 2013 - 2018) submitted by Spain to the European Commission indicating that, at both species and habitat level, in the terrestrial environment there has been a regression in conservation status, the risk associated with this indicator is designated as specified.

2.2.3 Soil quality in the Supply Base shall be maintained or enhanced

Based on the evidence of soil loss in Spain and the typology of forestry works within the scope of Almeda Torrent's SBP certification, the risk is designated as low except for clear-cutting of eucalyptus plantations in Andalusia in areas with a slope of more than 30%, where it is designated as specified.

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

Based on the evidence described, the risk is designated as low except for clear cuts in Andalusia of eucalyptus trees on large areas, more than 50 ha continuous, and clear cuts in Andalusia of eucalyptus trees on areas with more than 30% slope, where it is designated as specified.

2.2.11 The impacts of natural processes such as fires, pests and diseases shall be managed.

Based on the evidence described, the risk related to this indicator is classified as follows:

1. * low for pest and disease management
2. * low for forest fire management in public forests
3. * specified for forest fire management in private forests.

4.1.10 Safeguards shall be put in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures.

Based on available evidence and forestry occupational accident statistics, low risk is designated for forest improvement/harvesting work on public forests and specified risk for forest improvement/harvesting work on private forests.

6.2 CB evaluation of specified risk indicators and mitigation measures

Country
Spain
Area/Sub-Scope
And./Cast.-Man./Mur./Val./Gal./Ast./Cant./CyL
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
Based on evidence from the Article 17 of the Habitats Directive 92/43/EEC reports (2013-2018 period) submitted by Spain to the European Commission, which indicate a decline in the conservation status of both species and habitats within the terrestrial environment, a specified risk is designated. Furthermore, due to the complete lack of management involvement by the organization extracting the agricultural material, a specified risk is assigned to this material type.
Detailed description of a mitigation measure
In the case of forest material coming from areas where high conservation values are identified, both at species and habitat level, linked to the Natura 2000 Network, material is accepted if it has been verified through consultations with public administration personnel related to conservation that the forestry activity carried out to obtain the material, which includes the conditions that may be established by the competent authority in its permits, does not put at risk or negatively affect the High Conservation Value. Novalis will record the contacts made in order to justify the mitigation measure and will follow any conditions/measures specified in the contacts made. In this respect, it is considered that, although there is an article 17 report that justifies the specified risk, it is also noted that the Autonomous Communities, as competent authorities, have information (public or restricted viewers with precise information) and adequate means (environmental agents and conservation departments) to serve as a mitigation measure when working in the aforementioned areas.
Detailed description of CB evaluation of mitigation measure and its conclusions
1. Auditor analyzed a sample of entries of primary feedstock received in the reporting period and evaluated harvest permits, purchase documents, delivery notes, invoices,

supplier audits, Novalis checklist, origin information, etc. 2. Auditor analyzed geo-coordinates of a sample of entries and verified with geo databases potential HCV 3. Auditor witnessed how BPs staff evaluated harvesting practices and HCV. 4. Mitigation found sufficient to ensure that the feedstock is received as low risk

Country
Spain
Area/Sub-Scope
And./Cast.-Man./Mur./Val./Gal./Ast./Cant./CyL
Indicator
2.2.3 Soil quality in the Supply Base shall be maintained or enhanced
Specified risk description
Based on evidence of soil loss in Spain and considering the forestry work within the scope of Novalis' SBP certification, the risk is designated as low. Exceptions include clear-cuts of eucalyptus in Andalusia, specifically in areas with slopes exceeding 30%, and the management of woody crop biomass from agricultural sources, where the risk is designated as specified.
Detailed description of a mitigation measure
As a general mitigation measure, NOVALIS will only accept forest biomass from felling in private forests with eucalyptus stands with more than 30% slope, in the case of forests with a Management Plan approved by the competent administration. Those forests with eucalyptus stands on which work is to be done with a slope of more than 30% and which do not have an approved Management Plan, will be excluded from the supply base (Supply Base). The same criteria apply to work on private forests not under Novalis' responsibility, where Novalis buys wood or wood chips from suppliers. In the harvesting of eucalyptus in Andalusia, the Andalusian Regional Government usually limits the work in the felling licence in order to avoid any risk to the quality and structure of the soil. Specifically, one of the measures that are usually established in sloping areas is the impossibility of stump removal to ensure the soil's grip.
Detailed description of CB evaluation of mitigation measure and its conclusions
1. Auditor analyzed a sample of entries of primary feedstock received in the reporting period and evaluated harvest permits, purchase documents, delivery notes, invoices, supplier audits, Novalis checklist, origin information, etc. 2. Auditor evaluated during field visits harvesting practices and potential impacts on soil. During field visits auditor witnessed Novalis staff to verify their own evaluation. No discrepancies were found between auditor and Novalis staff criteria. 3. The mitigation measure is considered sufficient

Country
Spain
Area/Sub-Scope

And./Cast.-Man./Mur./Val./Gal./Ast./Cant./CyL
Indicator
2.2.5 Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.
Specified risk description
As per the SBE, the risk is designated as low except for: • Eucalyptus clearcuts in large areas (greater than 50 hectares, continuous), • Eucalyptus clearcuts in Andalusia on slopes exceeding 30%, and • Agricultural biomass management, where it is designated as specified.
Detailed description of a mitigation measure
As a general mitigation measure, NOVALIS will only accept biomass from felling made on private property of eucalyptus trees with a continuous felling area greater than 50 ha, or from eucalyptus felling in Andalusia in areas with more than 30% slope, in the case of forests with a Management Plan approved by the competent administration, see SBR. Forests in those conditions without approved Management Plan, will be excluded of the supply base (Supply Base). For clearcuts of eucalyptus in Andalusia, the Junta de Andalusia usually limits the logging license to avoid negative impacts. Specifically, one of the measures established is respect for the banks and watercourses, as well as the impossibility of removing stumps in order to ensure the grip of the land and possible effects on the waters. In any case, in the biomass coming from eucalyptus fellings with a surface area of more than 50 ha or in Andalucian areas with a slope of more than 30%, Novalis will identify and delimit, in the event of evidence of their presence, the elements to be protected with respect to the affectation to the waters so that they are protected while the logging works are carried out. These measures will be conveniently documented in the work file. For work in private forests not carried out under its responsibility, where Novalis buys wood or chips from suppliers, the same criteria apply. On the other hand, Novalis has a system implemented with the following elements in order to minimize possible impacts: - Manual and code of good environmental practices, recommended behaviours for own workers and workers of subcontracted companies, which is known by all the workers of the company and its subcontractors. This manual develops basic protection measures such as respect for riverbeds and riparian vegetation, respect for wetlands and small springs, and in the case of the existence of water resources, physical and chemical alterations of the waters and of the channels, respecting the areas of public hydraulic domain and avoiding the dragging of materials due to erosive processes. - Code of Conduct that governs the basic criteria that must guide the way of acting of any worker. - When Novalis buys chips from other suppliers, and therefore the work in the forest is not under its responsibility, it includes in the agreements with its suppliers the right of access to all relevant information in this regard and the transmission of the work methodology.
Detailed description of CB evaluation of mitigation measure and its conclusions
1. Auditor analyzed a sample of entries of primary feedstock received in the reporting period and evaluated harvest permits, purchase documents, delivery notes, invoices, supplier audits, Novalis checklist, origin information, etc. 2. Auditor evaluated during field visits harvesting practices and potential impacts on water. During field visits auditor witnessed Novalis staff to verify their own evaluation.

No discrepancies were found between auditor and Novalis staff criteria. 3. The mitigation measure is considered sufficient

Country
Spain
Area/Sub-Scope
And./Cast.-Man./Mur./Val./Gal./Ast./Cant./CyL
Indicator
2.2.11 The impacts of natural processes such as fires, pests and diseases shall be managed.
Specified risk description
Based on the evidence described in the SBE, the risk related to this indicator is classified as follows: 1. low for pest and disease management 2. low for forest fire management in public forests 3. specified for forest fire management in private forests.
Detailed description of a mitigation measure
Most of the forest works covered by the Novalis certificate are forestry treatments to improve forest stands, which normally has a positive impact on the prevention of forest fires as it reduces the density and continuity of forest stands. In order to mitigate the risk defined in the management of forest fires in private forests, the following decision tree is established to be corroborated before introducing the material into the Novalis Supply Base: a. Technical Documentation required by the Administration in terms of defence against Forest Fires; does the property comply with its obligations established by the legislation, of each of the Autonomous Communities, in terms of prevention and defence against forest fires (Distances, Prevention Plan, approved Management Project/Management Plan...)? b. Requirements for forestry work companies to work in the forest in times of high fire risk; does the company have all the necessary means to work in times of high fire risk or/and does it comply with the established restrictions/approval requirements?
Detailed description of CB evaluation of mitigation measure and its conclusions
1. Auditor analyzed a sample of entries of primary feedstock received in the reporting period and evaluated harvest permits, technical documentation regarding forest fire prevention, fire fighting equipment, supplier audits, Novalis checklist, origin information, etc. 2. Auditor evaluated during field visits harvesting practices and potential risks and impacts of forest fires. During field visits auditor witnessed Novalis staff to verify their own evaluation. No discrepancies were found between auditor and Novalis staff criteria. 3. The mitigation measure is considered sufficient.

Country
Spain
Area/Sub-Scope
And./Cast.-Man./Mur./Val./Gal./Ast./Cant./CyL

Indicator
4.1.10 Safeguards shall be put in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures.
Specified risk description
The risk related to this indicator is classified as: 1. Low in the following: forest improvement/harvesting work in public forests, forest improvement/harvesting work carried out by Novalis, and forest improvement/harvesting work carried out in private forests by companies with valid OSHAS/ISO 45001 certificates. 2. Specified in the improvement/forestry work carried out in private forests by companies that do not hold a valid OSHAS/ISO 45001 certification. 3. Specified with regard to occupational accidents occurring during work on woody crops on farms that are sources of agricultural biomass, carried out by companies other than Novalis
Detailed description of a mitigation measure
Novalis has an implemented system that covers the aspects to be taken into account to ensure that it complies with the legislation on PRL and Occupational Health and Safety. It has a third-party prevention service and has both a risk assessment for each job position and all the safety documentation, which includes: - Manual of good practices in Sustainable Forest Management, recommended behaviours for own workers and workers of subcontracted companies, - Forest Work Sheets, complete document used in field work with a description by type of work: felling, loading and unloading, clearing, removing, processing, etc. - Forest Machinery Management Records, complete document used in field work. - PPE delivery sheet. In turn, it has a system to collect from its subcontractors and suppliers all the necessary information to ensure compliance with current legislation on Health and Safety at work: Medical aptitude certificates, training certificates and information on PRL, PPE delivery certificate, etc. In the case of suppliers, in general, the documentary procedure already implemented in the CdC (NCC-PG03 EVALUATION OF CdC SUPPLIERS) is applied to them, which ensures that a minimum required threshold is covered: self-declaration, available certificates, prevention service, be up to date with payments... (Screening of companies). As already indicated, SUPPLIERS WITH OSHAS/ISO 45001 are considered adecuate and their risk is classified as low. In the case of suppliers who do not have a valid OSHAS/ISO 45001 certification, information is collected on possible occupational accidents at the workplaces where the raw materials are sourced. For this purpose, an accident report from the mutual insurance company of the specific work centre can be used and, if there has been any relevant accident, information is requested regarding: o Analysis of the causes of accidents. o Taking measures in the event of serious accidents. o Follow-up of minor accidents to avoid unjustified recurrences. o The system includes the need for field inspection in the case of systematic occurrence of labour accidents in jobs that originate the SBP certified raw material. In these cases, an evaluation of the works will be carried out by means of a checklist in which the measures to avoid accidents or impacts are evaluated, establishing a system of reporting non-compliance to the companies.
Detailed description of CB evaluation of mitigation measure and its conclusions
1. Auditor analyzed a sample of entries of primary feedstock received in the reporting period and evaluated harvest permits, purchase documents, applicable OSHAS certification, accident insurances and reports, clearance letters, Novalis

checklist, origin information, etc. 2. Interviews with workers during field visits confirmed that workers were aware of the safeguards put in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures 3. Mitigation found sufficient to ensure that the feedstock is received as low risk