



Supply Base Report:

Alstrup Skovservice ApS Fourth Surveillance Audit

Sustainable Biomass Program
sbp-cert.org



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

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

Document history

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1 Overview

Producer name:	Alstrup Skovservice ApS
Producer address:	Egerisvej 5, 6920 Videbæk, Denmark
SBP Certificate Code:	SBP-05-18
Geographic position:	56.065300, 8.690000
Primary contact:	Jette Fromberg Nielsen, +45 211 829 29, jette@alstrupskov.dk
Company website:	www.alstrupskov.dk
Date report finalised:	24 Apr 2026
SBR reporting period from:	01 Mar 2025
SBR reporting period to:	28 Feb 2026
Name of the Certification Body:	DNV Business Assurance Finland Oy Ab
Certification Body Approval date:	19 May 2026
SBP Standard(s) used:	SBP Standard 1: Feedstock Compliance v2.0, SBP Standard 2: Feedstock Verification v2.0, SBP Standard 4: Chain of Custody v2.0, SBP Standard 5: Collection and Communication of Data v2.0, Instruction Document 1A: SBP Requirements for Primary Feedstock from Trees Outside Forests (TOF) v1.0, Instruction Document 5E: Collection and Communication of Energy and Carbon data. v2.1, Instruction Document EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413 v2.0
Feedstock origin (countries)	Denmark (-)
Weblink to Standard(s) used:	https://sbp-cert.org/documents/standards-documents/standards

2 Description of the Biomass Producer and the Supply Base

2.1 Description of the company

Alstrup Skovservice er en dansk biomasseproducent med base i Vorgod-Barde i Vestjylland. Virksomheden producerer årligt cirka 55.000 tons træflis til energi- og biomasseformål.

Det primære indkøbsområde er placeret i Midt- og Vestjylland, hvorfra størstedelen af biomassen indkøbes. Derudover indkøbes og produceres biomasse i Nordjylland og på Læsø. Forsyningsgrundlaget består hovedsageligt af skovbevoksninger (nåle- og løvskov) og træer uden for skove (TOF), herunder læområder, små plantager, landskabsforvaltningsprojekter og landbrugsplantager.

Råmaterialet stammer primært fra udtynding, lavkvalitets rundtræ, skovaffald og landskabspleje. Biomasseproduktion udføres med et stærkt fokus på bæredygtig ressourceudnyttelse, overholdelse af lovgivningen og ansvarlig skovforvaltningspraksis.

Med mere end 40 års erfaring inden for skovdrift leverer Alstrup Skovservice professionelle skovbrugstjenester, herunder skovforvaltning, mekaniseret og manuel hugst, flisning og handel med tømmer og træflis. Driften udføres med moderne specialmaskiner og uddannet personale for at sikre effektivitet, høj produktkvalitet og fuld sporbarhed i hele forsyningskæden.

Vi specialiserer os i produktion af træflis til energi- og biomasseformål og leverer cirka 55.000 tons årligt. Vores produktion foregår primært i skove og fra træer uden for skvområder – altid med fokus på bæredygtighed og effektiv ressourceudnyttelse.

Products included in the scope of SBP Certification: WB 2.1 Wood chips, WB 4.1 Roundwood

Number of employees: 10

Annual maximum production capacity (metric tonnes): 55000

Number of direct feedstock suppliers: 150

Approximate number of feedstock sub-suppliers: 0

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

Alstrup Forest Services handles the entire process – from task screening and planning to felling, chipping, transport, and the sale of wood chips to combined heat and power plants. Chipping and transport can be outsourced as needed in accordance with existing agreements.

2.2 Detailed description of the Supply Base

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

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

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

Country	Denmark
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Area/Region	-
Exclusions	
Feedstock types	Primary
Feedstock Product Groups	Forest feedstock (1A), Trees outside forest (TOF) - Urban and landscape feedstock (2A), Trees outside forest (TOF) - Agricultural land feedstock (3A)
Feedstock inputs	SBP Compliant feedstock
Is the forest managed to supply energy and non-energy markets?	No
For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?	Yes - Majority
Risk assessment(s)	Yes – Regional Risk Assessment (RRA) used
Provide a concise summary of why a SBE was determined to be required or not required here:	
Alstrup Skovservice harvests most of the feedstock in noncertified forests and in areas outside forest, such as urban areas and woody residue from windbreaks which means that the supply base must be evaluated.	
Feedstock types included in SBE:	Primary
Includes EU RED SBE:	Yes
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	Yes
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	0.6300
Map(s) of the Supply Base area:	



2.3 Feedstock information

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

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

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

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

- e. **Hardwood (i.e. broadleaf trees): specify proportion of feedstock from (%):** 37.00
- f. **Softwood (i.e. coniferous trees): specify proportion of feedstock from (%):** 63.00
- g. **Proportion of feedstock composed of or derived from saw logs by weight (%):** 0.00
- h. **Indicate how you determine the proportion of saw log:** Specification used by the sawmill closest to where the wood was grown.
- i. **Roundwood from fellings from forests with > 40 yr rotation times - Average % volume of fellings delivered to BP (%):** 3.41
- j. **Select forest type(s) where the primary feedstock was sourced from:** Mix of The Above
- k. **Select the main harvesting system(s) used for the sourced primary feedstock:** Mix of the above
- l. **Volume of primary feedstock from primary forest:** 0

m. Volume of processing residues feedstock: 0

Physical form of the feedstock:

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

o. Volume of post-consumer feedstock: 0

Physical form of the feedstock:

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

100000 tonnes

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

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

3 Supply Base Risk Assessments and Risk Management Measures

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

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

3.1 Summary of the Supply Base Evaluation

Alstrup Skovservice uses the SBP approved RRAs for Denmark, both the RRA for forests and the RRA for TOFs. Six (6) indicators are identified as specified risk in the Danish RRA for forest, and eight (8) indicators are identified as specified risk in the Danish RRA for TOF. The specified risks are reduced to low risk by implementing the proposed risk mitigation measures, as detailed beneath under each of the indicators with specified risk, where the main measures are:

- screening and check of all public available data
- field inspection before operations and agreement with the landowner
- work instructions and maps with identified values and classification of feedstock.

3.2 Conflicts with applicable national and sub-national legislation

There are no known conflicts with legislation.

3.3 Risk Management Measures

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

Country: Denmark	
Area/sub-scope: Forest	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☒ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim

☐ Biomass Producer's own risk assessment
Indicator with specified risk:
2.1.1 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.
Description of the specific risk:
Risk conclusion and justification Forest Based on the evidence provided in the RRA Denmark, it is concluded that there is a specified risk that at least locally-important key biotopes in forests – including those covered by the Forest Act and those not covered by the Forest Act – have not yet been identified and mapped so may therefore be at risk from threats due to the sourcing of biomass.
Mitigation measure:
All work areas will be screened at the office and then physically inspected. Observations in connection with inspection and screening are registered on a map and checklist. Map and checklist is shared with machine operators and forest workers. How we operate, screen areas and perform the physical inspection, is described in our procedure (Entrepreneurhåndbogen).
Monitoring and outcomes:
Regular internal audit ensure effective implementation

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

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

Description of the specific risk:

Risk conclusion and justification Forest

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

Mitigation measure:

All work areas will be screened at the office and then physically inspected. Observations in connection with inspection and screening are registered on a map and checklist.

Map and checklist is shared with machine operators and forest workers.

How we operate, screen areas and perform the physical inspection, is described in our procedure (Entrepreneurhåndbogen).

Monitoring and outcomes:

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

Country: Denmark

Area/sub-scope: Forest

Risk Assessment used:

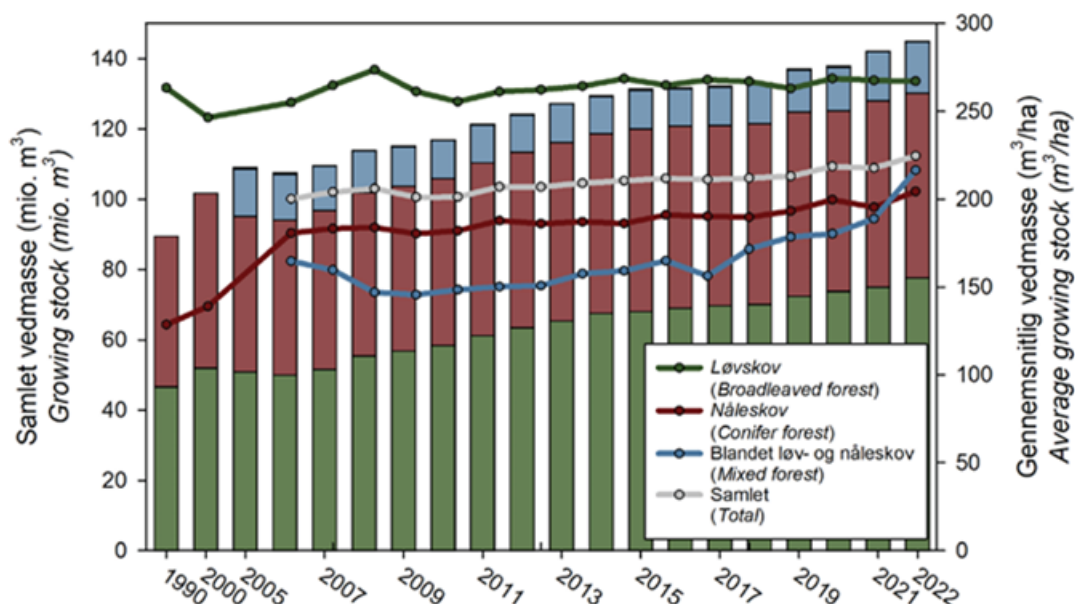
- ☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim
- ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim
- ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim
- ☒ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed
- ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim
- ☐ SBP-RRA-EU-EE-FOR_v2.0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

Indicator with specified risk:

2.1.3 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.
Description of the specific risk:
Risk conclusion and justification Forest Based on the RRA Denmark analysis, the risk for this Indicator is assessed as specified for both forests covered by the Forest Act and forests not covered by the Forest Act.
Mitigation measure:
All work areas will be screened at the office and then physically inspected. Observations in connection with inspection and screening are registered on a map and checklist. Map and checklist is shared with machine operators and forest workers. How we operate, screen areas and perform the physical inspection, is described in our procedure (Entrepreneurhåndbogen).
Monitoring and outcomes:
Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base have been maintained. Some areas may have been enhanced through the retention of high stumps; however, this has not been measured, and we do not claim specific expertise in assessing such effects.

Country: Denmark
Area/sub-scope: Forests
Risk Assessment used:
☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☒ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:
2.2.9 Harvesting levels shall be justified as to how they can be sustained with reference to inventory and growth data for the Supply Base.

Description of the specific risk: Scale of assessment The scale of assessment covers forest harvesting in Denmark. Analysis According to the Danish National Forest Inventory (NFI) 2021 – which covers all forests in the country – there has been a net increase in both forest area and standing volume in the period examined (2017–2021) (Nord-Larsen et al. 2023). Over the period examined, the standing volume on average increased by an estimated 2.1 million m3 per year, compared to a total annual harvest and mortality of 4.3 million m3 per year, for a total annual increment of 6.4 million m3 per year. Due to age class distribution in the individual forests, there can be management plan periods where the harvest levels exceed the increase in standing volume. These harvest levels are justified using inventory and growth data and do not threaten forest productivity or long-term economic viability. However, a forest management plan is not a legal requirement in Denmark for forests that are not Natura 2000 sites (Preferred by Nature 2017), and some smaller forest estates do not have management plans at all as opined by Sofie Tind Nielsen from WWF Denmark. In particular, in non-fredskov harvesting levels are not required by any legislation to be sustained regarding inventory and growth data. Enforcement and monitoring The Danish Environmental Protection Agency under the Ministry of Environment enforces the relevant legislation. Regular monitoring of the enforcement is conducted and reported by the concerned agencies. Risk conclusion and justification Based on the above information, the risk for this Indicator has been assessed as low for forests covered by the Act and specified for forests not covered by the Act.
Mitigation measure: Forests not covered by the Forest Act is often small and they do not have mangagement plan or data of growth. According to the Danish National Forest Inventory (NFI), the wood mass in the Danish forests Denmark, our Supply Base, grows every year. Which means that we are not over utilizing our forest area, nor forest not cover by the Forest Act.



Monitoring and outcomes:

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

Country: Denmark

Area/sub-scope: Forests

Risk Assessment used:

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

☐ Biomass Producer's own risk assessment
Indicator with specified risk:
2.2.10 Harvested areas shall be regenerated
Description of the specific risk:
Risk conclusion and justification The Danish Environmental Protection Agency in collaboration with the Danish Nature Agency – both under the Ministry of Environment enforces the Forest Act and Nature Protection Act. The Danish Energy Agency under the Ministry of Climate, Energy and Utilities enforces regulations related to energy. Regular monitoring of the enforcement is conducted and reported by the concerned agencies. Based on the RRA Denmark analysis, it is concluded that the risk rating for this Indicator is 'low risk' for forests covered by the Forest Act and 'specified risk' for forests not covered by the Forest Act.
Mitigation measure:
On all forest areas that are not covered by the Forestry Act, we ensure that they are re-established where we carry out clear cutting. We have a legally binding agreement with the individual lot owner, which is signed before the task starts. The agreement is recognized in the industry and is used by all actors in our supply base. When biomass is produced on areas that is protected by law, ex. nature conservation areas, relevant authorities are consulted. How we operate, screen areas and perform the physical inspection, is described in our procedure (Entrepreneurhåndbogen).
Monitoring and outcomes:
It is our experience that forest owners generally have a good understanding of the replanting requirement. In some cases, Alstrup Skovservice is responsible for carrying out the replanting. Certain areas will be regenerated naturally, while in other areas planting is carried out by the forest owner.

Country: Denmark
Area/sub-scope: Forests
Risk Assessment used:
☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☒ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim

	☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
3.2.3 feedstock shall not be sourced from forest areas in the Supply Base which, according to local definitions or norms, are classified as having combined attributes of high carbon stocks and high conservation value (HCV).	
Description of the specific risk:	
Based on the evidence provided in the RRA Denmark, it is concluded that there is a risk that at least locally important key biotopes both in forests covered by the Forest Act and forests not covered by the Forest Act have not yet been identified and mapped and may therefore be at risk due to the sourcing of biomass. In practice, the areas of concern would be old, mature forest stands that are in a natural or semi-natural state and have not been identified or mapped. However, it is also concluded that some source types are inherently low in key biotopes, such as first-generation afforestation areas or even-aged stands of conifers.	
Mitigation measure:	
There is extra focus on preserving natural values when we work in old deciduous forests. Old deciduous forests will often appear on the HNV map and result in a value above 9. Screening the HNV map is part of our procedure. If not, we will see it when the areas are physically inspected.	
Forest Origin 1. FSC or PEFC-certified forests 2. Estates with a green management plan 3. Even- aged stands of conifers 4. Thinning in first-generation afforestation areas 5. Uneven-aged stands or stands of broadleaf species	Mitigating measures we will obtain certification information from the forest we work in. For FSC-certified forests, this will be enough, for PEFC-certified forests, we must... we will carry out a screening as we do on all other areas. The few properties that have a green management plan have often not maintained the plan and therefore it is not all areas will be screened at the office and then physically inspected. Observations in connection with inspection and screening are registered on a map and checklist. Through this, it is shared with machine operators and forest workers. As described in point 3. As described in point 3.
Monitoring and outcomes:	
Together with the field inspection ,mapping and the concise checklist format effectively identifies and records not protected elements in the forest. Combiende with expienced machindrivers, we consider that relevant not registered areas wtih high HCV are protected.	

Country: Denmark	
Area/sub-scope: ToF	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☒ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.4 Where the removal of harvest forest residues and/or stumps occurs, this shall not lead to irreversible negative impacts to the ecosystem.	
Description of the specific risk:	
Risk conclusion and justification In summary of the RRA TOF Denmark, it is assessed, that the level of dead wood is considered to be at a low level today. The lack of inventory on dead wood in TOF origins lead to a conclusion that no strong impact assessment on ecosystem can be assessed and this should be considered in the coming years. Therefore, on basis of an anticipated low level of dead wood, lack of inventory of dead wood and lack of assessment on ecosystem, a precautionary assessment of a specified risk for negative impact on the ecosystem in hedgerows and smaller woodlots and nature conservation areas is assessed. However, for the TOF origins "Woody residue from agricultural land" and "Woody Energy crops, short rotation coppice" the feedstock type of these origins is not considered to produce deadwood and therefore there is low risk for these two origins.	
Mitigation measure:	
Existing dead wood in windbreaks and smaller forest stands is preserved if it does not pose a danger or can spill over into intensively managed areas. machin operators are educated in preservining and creating dead or dying wood. Dead or dying wood can be advantageously left in connection with extensively managed areas, e.g. along §3 areas.	
Monitoring and outcomes:	
In the recent year, we have focused on retaining deadwood in shelterbelts and small forest stands. In our assessment, this increased focus has resulted in the creation of more high stumps where conditions have allowed.	

Country: Denmark	
Area/sub-scope: ToF	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☒ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.5 Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.	
Description of the specific risk:	
Risk conclusion and justification It is concluded that the risk of negative impacts on ground water, surface water and water downstream leads to the following assessments: Landscape areas Hedgerows and smaller woodlots: • Risk is considered low. Landscape areas are considered to have use-levels of pesticides and nitrogen which are far below the levels of the agricultural industry at large and more comparable to the lower levels used in forestry. It is anticipated that even though there is no direct protection for lakes of less than 100 m2 they benefit from landowners' interest in protecting them and from the general protection of larger lakes and therefore low risk is considered for these when found in connection with hedgerows or smaller wood lots. Nature conservation areas: • The water course regulations implemented by the municipalities differ across Denmark and set different protection zones to water courses. BEK nr 919 (2016). As feedstock is harvested along protection zones across Denmark, these areas are important for downstream protection of hydrology. Data are insufficient to settle on low risk, and therefore as a precautionary approach specified risk is suggested for 1) altered/reduced water quality, including but not limited to, sedimentation, turbidity, water temperature; 2) altered/Reduced water quantity, including but not limited to, increased or decreased volume, seasonality, peak-flow, surface run-off and 3) altered/reduced of riparian habitat and function (SBP, 2023) Woody residues from agricultural land including primary agricultural production site • The trends are neutral to positive for the Harmonized Risk Indicators for pesticide use in Denmark. Regarding nitrogen leaching, the surplus in the field balance has fallen approx. 44% between 2004 and	

2020 – which is good. Christmas tree plantations and orchards are considered to have usage of pesticides and nitrogen which are at the same levels as for the agricultural industry at large. This is supported by calculations on use of pesticides from the Danish Christmas Tree Association with information indicating a slightly lower use than average for the agricultural industry, therefore low risk is assessed for woody residues production. Regarding the protection of lakes under 100 m² which aren't protected by the Nature Protection Act, there is considered small likelihood of these on the typical agricultural land, and therefore **low risk**.

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

Wood energy crops, short rotation coppice: low risk

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

Mitigation measure:

In connection with our screening, §3 registered watercourses are mapped and relevant authorities are involved if felling is to be carried out along the watercourse. See Entreprenørhåndbogen If felling is to be carried out at watercourses that are not protected by NBL §3, we work according to the requirements of the associated watercourse regulations (vendløbsregulativ). If there are no regulations, the relevant authority is contacted.
If there are no regulations, the relevant authority is contacted to clarify any requirements for the felling work.

Monitoring and outcomes:

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

Country: Denmark

Area/sub-scope: ToF

Risk Assessment used:

- ☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim
- ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim
- ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim
- ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed
- ☒ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim
- ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed
- ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed
- ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed
- ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim
- ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim
- ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim
- ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim

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

Country: Denmark	
Area/sub-scope: ToF	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☒ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed

	☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment																		
Indicator with specified risk:																			
2.1.1 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.																			
Description of the specific risk:																			
Risk conclusion and justification TOF As described in RRA TOF Denmark both private and public based identification systems of HCV's exist on TOF origins in Denmark, there is no systematic identification of HCV's and therefore the indicator is assessed as specified risk.																			
Mitigation measure:																			
<table border="0"> <thead> <tr> <th data-bbox="172 999 308 1025">TOF Origin</th><th data-bbox="443 999 683 1025">Mitigating measures</th></tr> </thead> <tbody> <tr> <td colspan="2" data-bbox="172 1043 392 1070">Landscape areas</td></tr> <tr> <td data-bbox="172 1104 379 1167">- Hedgerows and smaller woodlots</td><td data-bbox="443 1081 1437 1189">All areas will be screened at the office and then physically inspected. Observations in connection with inspection and screening are registered on a map and checklist. Through this, it is shared with machine operators and forest workers.</td></tr> <tr> <td data-bbox="172 1216 432 1279">- Nature conservation areas</td><td data-bbox="443 1193 1422 1301">Projects in areas protected by the Nature Protection Act are planned with the local authorities (kommune), we only work in these areas if we have permission or a dispensation.</td></tr> <tr> <td data-bbox="172 1305 424 1368">Urban, domestic and infrastructure</td><td data-bbox="443 1328 488 1355">N/A</td></tr> <tr> <td colspan="2" data-bbox="172 1429 387 1525">Woody residues from agricultural land</td></tr> <tr> <td data-bbox="172 1541 384 1603">- Woody residues production</td><td data-bbox="443 1563 544 1590">Low risk</td></tr> <tr> <td data-bbox="172 1619 416 1682">- Primary production of the agriculture</td><td data-bbox="443 1641 488 1668">N/A</td></tr> <tr> <td data-bbox="172 1697 416 1760">Wood energy crops, short rotation coppice</td><td data-bbox="443 1720 544 1747">Low risk</td></tr> </tbody> </table>	TOF Origin	Mitigating measures	Landscape areas		- Hedgerows and smaller woodlots	All areas will be screened at the office and then physically inspected. Observations in connection with inspection and screening are registered on a map and checklist. Through this, it is shared with machine operators and forest workers.	- Nature conservation areas	Projects in areas protected by the Nature Protection Act are planned with the local authorities (kommune), we only work in these areas if we have permission or a dispensation.	Urban, domestic and infrastructure	N/A	Woody residues from agricultural land		- Woody residues production	Low risk	- Primary production of the agriculture	N/A	Wood energy crops, short rotation coppice	Low risk	Monitoring and outcomes: Mapping and the concise checklist format effectively identifies and records protected elements (e.g. Section 3 areas and valuable forest). Together with the field inspection, we consider that relevant key species, habitats, ecosystems, and HCV areas related to biodiversity in the Supply Base have been identified.
TOF Origin	Mitigating measures																		
Landscape areas																			
- Hedgerows and smaller woodlots	All areas will be screened at the office and then physically inspected. Observations in connection with inspection and screening are registered on a map and checklist. Through this, it is shared with machine operators and forest workers.																		
- Nature conservation areas	Projects in areas protected by the Nature Protection Act are planned with the local authorities (kommune), we only work in these areas if we have permission or a dispensation.																		
Urban, domestic and infrastructure	N/A																		
Woody residues from agricultural land																			
- Woody residues production	Low risk																		
- Primary production of the agriculture	N/A																		
Wood energy crops, short rotation coppice	Low risk																		

Country: Denmark	
Area/sub-scope: ToF	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☒ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.1.2 Threats to and impacts on the identified key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified and evaluated.	
Description of the specific risk:	
Conclusion for hedgerows and smaller wood lots: It is concluded that the biodiversity importance of hedgerows in Denmark isn't unique; that hedgerows have national scale importance for red listed species and local importance for important flora and fauna and; that hedgerows have been cut extensively since biomass became sellable to Combined Heat and Powerplants. The handbook by the Energy Agency also handles the abovementioned points as critical for the risk assessment of high nature values and require a professional assessment before a harvest activity can take place. On this basis, and in line with the Danish Energy Agency, it is concluded that there is specified risk for threats to and impacts on the key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in hedgerows and smaller woodlots. Conclusion for Nature Conservation areas: it is concluded that since nature conservation areas "grow into" and "out of" protection then there is risk of wrongly assessing if the harvest of biomass will lead to a change in status on nature conservation and therefore specified risk for threats to and impacts on the key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity is assessed for Nature Conservation areas.	
Mitigation measure:	
TOF Origin	Mitigating measures

Landscape areas

- Hedgerows and smaller woodlots

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

- Nature conservation areas

Projects in areas protected by the Nature Protection Act are planned with the local authorities (kommune), vi arbejder kun i disse områder, hvis vi har tilladelse eller en dispensation.

Bymæssige, private og infrastruktur

Ikke tilgængelig

Træholdige rester fra landbruget jord

- Træholdige rester produktion

Lav risiko

- Primærproduktion af landbruget

Ikke tilgængelig

Træenergi afgrøder, kort rotationsskov

Lav risiko

Monitoring and outcomes:

Identifikation og vurdering af områder, der potentielt er sårbare over for skader fra biomasseproduktion, sammen med kommunikation til maskinoperatører, har sikret, at ingen områder er blevet beskadiget som følge af vores aktiviteter.

Country: Denmark

Area/sub-scope: ToF

Risk Assessment used:

- ☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim
- ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim
- ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim
- ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed
- ☒ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim
- ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed
- ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed
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- ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim
- ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim
- ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim

☐ Biomass Producer's own risk assessment	
Indicator with specified risk:	
2.1.3 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.	
Description of the specific risk:	
Risk Conclusion and justification TOF <u>Landscape and smaller wood lots</u> On basis lack of maintenance and enhancement plans for: Red listed species and species on the EU habitat directive; habitat provided by old/older/food trees; habitat provided by continuous hedgerows and the habitat which hedgerows of native species provide on sandy soils, it is concluded that there is specified risk for maintenance and enhancement of key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base. <u>Nature conservation areas</u> As the practice of how to maintain and enhance HCV's is different between municipalities the indicator is assessed as specified risk. A guideline on clearing obligation on farmlands has been published in 2023. There is considered low risk in relation to this guideline as the farmers are obliged to clear the land with 5 years interval which is not considered such a long period which will create habitat which should be protected.	
Mitigation measure:	
TOF Origin Landscape areas - Hedgerows and smaller woodlots - Nature conservation areas Urban, domestic and infrastructure	Mitigating measures All areas will be screened at the office and then physically inspected. Observations in connection with inspection and screening are registered on a map and checklist. Through this, it is shared with machine operators and forest workers. Projects in areas protected by the Nature Protection Act are planed with the local athorites (kommune), we only work in these areas if we have permission or a dispensation. N/A
Woody residues from agricultural land - Woody residues production - Primary production of the agriculture Wood energy crops, short rotation coppice	Low risk N/A Low risk
Monitoring and outcomes:	

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

Country: Denmark	
Area/sub-scope: ToF	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☒ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.2 Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.	
Description of the specific risk:	
Risikokonklusion og begrundelse TOF <u>Hække og mindre skovlodder</u> På baggrund af den generelle mangel på juridisk beskyttelse kan identifikation og kortlægning af centrale økosystemer og levesteder for hække og mindre skovlodder udgøre en trussel mod disse områder. Denne indikator anses for at være stærkt sammenhængende med indikator 2.1.2, og derfor foreslås en specificeret risiko. <u>Naturbeskyttelsesområder</u> Naturbeskyttelsesområder i landskabet, Natura 2000-områder og individuelle beskyttede områder – som de er kortlagt, beskyttet og/eller bevaret i deres naturlige tilstand – er tilstrækkeligt vedligeholdt og også forbedret i Danmark. Denne indikator anses dog for at være stærkt sammenhængende med indikator 2.1.2, og derfor foreslås specificeret risiko. Specificeret risiko foreslås på baggrund af, at der ikke er ensartede Retningslinjer givet af kommunerne for graden eller måden, hvorpå hugst skal udføres, som opretholder eller forbedrer økosystemer, deres sundhed, vitalitet eller funktioner.	

Mitigation measure:	
TOF:	
TOF-oprindelse	Afbødende foranstaltninger
Landskabsområder	
- Hække og mindre skovlodder	Alle områder vil blive screenet på kontoret og derefter fysisk inspiceret. Observationer i forbindelse med inspektion og screening registreres på et kort og en tjekliste. Gennem dette deles det med maskinførere og skovarbejdere.
- Naturbeskyttelse områder	Projekter i områder beskyttet af naturbeskyttelsesloven planlægges sammen med de lokale myndigheder (kommune). Vi arbejder kun i disse områder, hvis vi har tilladelse eller en dispensation.
Bymæssig, boligmæssig og infrastrukturmæssig	Ikke tilgængelig
Træholdige rester fra landbruget jord	
- Træholdige rester produktion	Ikke tilgængelig
- Primærproduktion af landbruget	Ikke tilgængelig
Træenergi afgrøder, kort rotationsskov	Ikke tilgængelig
Monitoring and outcomes:	
All projects undergo an initial screening. If the screening identifies a need for an exemption or permit, this will be obtained from the relevant authority before work begins.	
For activities in protected natural areas, prior approval is always obtained in accordance with applicable legislation (including the Danish Nature Protection Act, Section 3).	
If the required approval is not granted, the project will not be carried out.	
For projects involving the removal of windbreaks, restoration agreements are prepared	

Country: Denmark	
Area/sub-scope: ToF	
Risk Assessment used:	
	☐ SBP-RRR-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRR-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRR-US-PF-FOR_v1.0 RRA for US Private FOR_Interim

	☐ SBP-RRR-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☒ SBP-RRR-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRR-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRR-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRR-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRR-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRR-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRR-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRR-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRR-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRR-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.10 Harvested areas shall be regenerated	
Description of the specific risk:	
Risikokonklusion og begrundelse TOF <u>Hække og mindre skovlodder</u> Der er ingen områdespecifik lovgivning, der sikrer regenerering, og på dette grundlag foreslås en specificeret risiko. Det foreslås dog, at stedspecifikke kontrolsystemer eller certificeringer, der er anerkendt af Energistyrelsen, kan mindske risikoen. <u>Naturbeskyttelsesområder</u> Naturbeskyttelsesloven og bevaringslovgivningen definerer, hvilke ændringer i et bestemt områdes tilstand der er tilladt. Retningslinjen varierer fra kommune til kommune, og derfor er der ingen sikkerhed for, hvilken indgriben der vil føre til "ingen ændring i status" eller en bedre bevaringsstatus, og derfor er der specificeret risikoen vurderes.	
Mitigation measure:	
På alle TOF-områder bestående af hække og mindre skovlodder sørger vi for, at de genetableres, hvor vi udfører renafhugst. Vi har en juridisk bindende aftale med den enkelte lodsejer, som underskrives, inden opgaven påbegyndes. Aftalen er anerkendt i branchen og bruges af alle aktører i vores forsyningsbase. Når biomasse produceres på områder, der er beskyttet af loven, tidligere naturbeskyttelsesområder, konsulteres relevante myndigheder. Hvordan vi arbejder, screener områder og udfører den fysiske inspektion, er beskrevet i vores procedure (Entrepreneurhåndbogen).	
Monitoring and outcomes:	
Der er indgået genplantningsaftaler, hvor relevant. Det er vores erfaring, at skovejere generelt har en god forståelse af genplantningskravet. I nogle tilfælde er Alstrup Skovservice ansvarlig for at udføre	

genplantningen, mens det i andre områder er lodsejeren, der udfører plantningen.

4 Stakeholder engagement

4.1 General description

Biomass Producer's stakeholder engagement start date: 26 Feb 2026

Biomass Producer's stakeholder engagement end date: 26 Mar 2026

Total number of stakeholders contacted: 21

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

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

Communication has been through E-mail.

We received no comments.

4.2 Response to stakeholder comments

5 Report updates and approval

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

Name	Jette Fromberg Nielsen
Title	Management representative
Date of report approval	24 Apr 2026

Annex 1: Detailed findings for Supply Base Evaluation indicators

Annex 2: EU RED Supply Base Evaluation

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

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

the national level, then the following definition shall apply: A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.

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

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

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

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

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

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

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

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

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

(vi)⁴ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses

referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.

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

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

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	This is checked during the screening of all forest and other wooded lands, as well as during field control before and after harvest. No biomass sourced from heathlands.

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

Article 29 (4): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:

*(a) **wetlands**, namely land that is covered with or saturated by water permanently or for a significant part of the year (NOTE: Evidence of verification of wetlands should reflect seasonal changes within a year).*

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

(vi)⁶ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.

*Article 29 (5): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was **peatland** in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.*

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

area	
(vii) that installations producing biomass fuels from forest biomass, issue a statement of assurance, underpinned by company-level internal processes, for the purpose of the audits conducted pursuant to Article 30(3), that the forest biomass is not sourced from the lands referred to in point (vi).	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	<i>Not applicable, requirement only applies to Level A</i>

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

Annex 2a: EU RED II Supply Base Evaluation

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

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

Verification and monitoring of suppliers

N/A

Feedstock inspection and classification upon receipt

N/A

Supplier audit for processing residues and post-consumer feedstock

N/A

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

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

Country: Denmark - -

Article 29 (2): Soil quality and soil carbon

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

(i) Impacts on soil quality

Step 1: Identification of applicable laws

Have the applicable law(s) been identified?	Yes
List of applicable law(s)	See Annex 6 RED Lecel A risk assessment
Sources	

Step 2: Description of enforcement and monitoring by competent authorities

Description of the practical implementation and monitoring of the law(s)	See Annex 6 RED Lecel A risk assessment
Sources	
Is the enforcement and monitoring ensured for the identified law(s)?	Yes

Step 3: Evaluation of the effectiveness of the legal framework

Evaluation of the practical implementation of the law(s) and explanation	See Annex 6 RED Lecel A risk assessment
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for the evaluation	
Sources	
Is legal framework effective?	Yes
Step 4: Detailed description of a management plan and monitoring at economic operator level	In the category of waste and residues products from agricultural production, which in Denmark will often be wood from Christmas tree plantations or fruit orchards, soil quality must not be destroyed when biomass is harvested. According to Danish legislation (BEK no. 495 of 16/05/2025, chp 4.2), residues from agricultural areas, e.g. discarded fruit trees, are exempt from this requirement.
(ii) Impact on soil carbon	
Step 1: Identification of applicable laws	
Have the applicable law(s) been identified?	Yes
List of applicable law(s)	See Annex 6 RED Lecel A risk assessment
Sources	
Step 2: Description of enforcement and monitoring by competent authorities	
Description of the practical implementation and monitoring of the law(s)	See Annex 6 RED Lecel A risk assessment
Sources	
Is enforcement and monitoring ensured for the identified law(s)?	Yes
Step 3: Evaluation of the effectiveness of the legal framework	
Evaluation of the practical implementation of the law and explanation for the evaluation	See Annex 6 RED Lecel A risk assessment
Sources	

Is legal framework effective?	Yes
Step 4: Detailed description of a management plan and monitoring applied at economic operator level	In the category of waste and residues products from agricultural production, which in Denmark will often be wood from Christmas tree plantations or fruit orchards, biomass production will not have an impact on carbon in the soil. According to Danish legislation (BEK no. 495 of 16/05/2025 chp 4.2), residues from agricultural areas, e.g. discarded fruit trees, are exempt from this requirement

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

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

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

Description of a management system process to meet the requirement.	Before the task starts, areas are screened for compliance with relevant legislation, such as the Forest Act, the Nature Protection Act, and internationally protected areas, e.g. Natura 2000 areas - which protect these areas. (BEK no. 495 of 16/05/2025 chp 4.3.1) All smaller forest areas under 0.5 ha are screened and mapped before biomass is produced. The procedure is described in the contractor handbook (entreprenørhåndbogen.) If we cannot ensure protection of high biodiversity before we start felling, we will not carry out the project.
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Article 29 (3b): Protection of land with high biodiversity value

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

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

Description of a management system process to meet the requirement.	Before the task starts, areas are screened for compliance with relevant legislation, such as the Forest Act, the Nature Protection Act, and internationally protected areas, e.g. Natura 2000 areas - which protect these areas. (BEK no. 495 of 16/05/2025 chp 4.3.1) All smaller forest areas under 0.5 ha are screened and mapped before biomass is produced. The procedure is described in the contractor handbook (entreprenørhåndbogen.) If we cannot ensure protection of high biodiversity before we start felling, we will not carry out the project.
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Article 29 (3c): Protection of land with high biodiversity value

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

(c) areas designated:

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

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

(i)

Description of a management system process to meet the requirement.

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

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

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

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

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

Description of a management system process to meet the requirement.

Not relevant to the activities we do.

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

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

Description of a management system process to meet the requirement.

Areas of this type will often be protected by the National Forest Act or designated as a Natura 2000 area. When we produce biomass in these areas, we ask the relevant local authorities before we start the task, as a permit or exemption is often required. The procedure is described in the SBP handbook

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

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

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

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

Description of a management system process to meet the requirement.

Areas of this type will often be protected by the National Forest Act or designated as a Natura 2000 area. When we produce biomass in these areas, we ask the relevant local authorities before we start the task, as a permit or exemption is often required. The procedure is described in the SBP handbook

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

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

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

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

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

Description of a management system process to meet the requirement.	Before the task starts, areas with agricultural biomass - willow and poplar - are screened. The status of the area as of January 2008 is examined and documented on the task. As described in <i>entreprenørhåndbog</i>
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Article 29 (4c): Protection of land with high carbon stock

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

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

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

Description of a management system process to meet the requirement.	Before the task starts, areas with agricultural biomass - willow and poplar - are screened. The status of the area as of January 2008 is examined and documented on the task. <i>JF.</i> <i>entreprenørhåndbog</i>
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Article 29 (5): Protection of peatland

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

Description of a management system process to meet the requirement.	Before the task starts, areas with agricultural biomass - willow and poplar - are screened. The status of the area as of January 2008 is examined and documented on the task. <i>JF.</i> <i>entreprenørhåndbog</i>
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Annex 4a: RED II detailed findings for Trees Outside Forest (TOF) feedstock

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