Control Union Certifications BV Evaluation of New Pellets, Lda. Compliance with the SBP Framework: Public Summary Report

Second Surveillance Audit

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The promise of good biomass

Completed in accordance with the CB Public Summary Report Template Version 1.5

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

Document history

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1 Overview

Certification Body (CB) Name:	Control Union Certifications BV
Primary CB contact for SBP:	Robin Rosendahl
Primary CB contact email:	rrosendahl@controlunion.com
Audit team leader:	Luis Vaz Freire
Audit team members:	Pedro Catarro (Expert)
Name of the Company:	New Pellets, Lda.
Company legal address:	Rua da Zona Industrial nº 139, 3270 – 029 Graça, Portugal
Company contact for SBP:	João Magalhães
Company contact email:	qualidade@pelletsfirst.pt
Company website:	N/A
SBP Certificate Code:	SBP-06-36
Date of certificate issue:	29 Feb 2020
Date of certificate expiry:	28 Feb 2025

Audit closing meeting date:	30 Nov 2021
Audit cycle:	Second Surveillance Audit

2 Scope of the evaluation and SBP certificate

Scope Item	Check all that apply to the Certificate Scope	Change in scope (N/A for Assessments)
Primary Activity:	Biomass Producer	☐
Approved Standards:	SBP Standard 1: Feedstock Compliance Standard; SBP Standard 2: Verification of SBP-compliant Feedstock; SBP Standard 4: Chain of Custody; SBP Standard 5: Collection and Communication of Data Instruction	☐
Includes Supply Base Evaluation (SBE):	Yes	☐
Includes communication of Dynamic Batch Sustainability Data (DBSD)	Yes	☐
Includes Group Scheme	No	☐
Products	Pellets	☐

Feedstock types:	Primary, Secondary	☐
Feedstock origin (countries):	Portugal	☐
SBP-endorsed Regional Risk Assessments used: **Public link:** https://sbp-cert.org/documents/standards-documents/risk-assessments/	Not applicable	☐
Chain of custody system implemented:	FSC: CU-COC-867336	☐
	Credit	☐

2.1 Description of the company

The Enerpellets Group has its origin from an initiative coming from a group of professionals that are highly experienced in the management of companies. This group identified an export opportunity in the value chain of thermal and electrical production. The Enerpellets Group is active in the energy business as a competent producer of renewable biomass, wood pellets. The Group has two industrial units located in Graça, Pedrogão Grande and Cós, Alcobaça. Both units are situated in the District of Leiria. New Pellets is situated in Graça, Pedrogão Grande and the production facility started in the design phase in 2007 and started production in January 2009. It is also certified for the production of premium wood pellets in bulk (Enplus A1). At the moment, it is one of the largest pellet production facilities in Europe and the largest in the Iberian Peninsula. The unit underwent a reconstruction phase after the fires in June 2017. This unit has an annual effective production capacity of 100,000 tons. The final product can be supplied in bulk, as part of its production is shipped by boat through the port of Aveiro. The transportation of pellets from the unit to the port of Aveiro is guaranteed by truck, benefiting from excellent highways. The geographical position of both units is strategic, as both units are located in the largest forest areas in Portugal. In terms of equipment, the unit is equipped with a selected set of equipment, widely tested in this industry, which have been valued for engineering details developed internally as a result of the experience gained. The BP has a FSC credit system to manage their Chain of Custody.

2.2 Detailed description of the Chain of Custody system

New Pellets is certified against FSC COC and its complementary CW standard, CU-COC-867336. Valid COC system description and other documents exist. The Organisation is implementing a credit system which is used for materials received as FSC certified, FSC Controlled wood and feedstock verified according to the Organisation’s own Controlled wood verification system, covering Portugal. Feedstock whos origin cannot be verified as per the established Due Diligence system, will be considered as Non-Controlled and will not be included in the production of certified products nor supplied as FSC CW - Controlled Wood, or SBP controlled. Supplier list is maintained. After the reception, incoming feedstock is unloaded into piles according to type of feedstock and load is registered into the recordkeeping system. All input material is weighted and recorded in tonnes. For the credit account purposed the volume of feedstock is recalculated by using the conversion factor of the production, the credit account is updated once in a month: data about received raw materials by certification status and volume of sold pellets are recorded. In case of the FSC, PEFC and/or SBP sales, the volume of sold pellets is withdrawn from the credit account.

3 Specific objective

The specific objective of this evaluation was to confirm that the Biomass Producer’s 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 the mitigation measures describing herein.

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;

- Review of the updated Supply Base Report;

- Review of the risk assessment results;

- Review of SBP system control points, analysis of the existing FSC CoC system;

- Evaluation of mitigation measures implemented for primary feedstock (including inspection of primary feedstock suppliers);

- Review of the records, calculations and conversion factors;

- GHG data collection analysis

- Interviews with responsible staff;

- Review of the records

4 Evaluation process

4.1 Timing of evaluation activities

Audit Level of Effort (LoE)		
Activity	***Auditors***	**Auditor hours**
1. Preparation	Luis Vaz Freire	6,0
2. On-site (excl. travel time)	Luis Vaz Freire, Pedro Catarro	24,0
3. Report writing	Luis Vaz Freire	8,0
4. Other	N/A	N/A

Audit Schedule			
Activity	**Location**	**Auditor name**	**Date/time**
Opening meeting Agreement on Scope	New Pellets	Luis Vaz Freire	22 Nov 2021/09:00
Presentation company and processes and procedures Business integrity, social, health and safety requirements	New Pellets	Luis Vaz Freire	22 Nov 2021/09:30

Incoming material claims and Incoming raw material registration Production	New Pellets	Luis Vaz Freire	22 Nov 2021/12:00
Lunch break	-	-	22 Nov 2021/13:00
Logo/Trademark use Complaints procedures Ouput Claims Chain of Custody registrations	New Pellets	Luis Vaz Freire	22 Nov 2021/14:00
Management system overview	New Pellets	Luis Vaz Freire	22 Nov 2021/17:00
Final discussion / days closing meeting	New Pellets	Luis Vaz Freire	22 Nov 2021/17:45
Day's Opening meeting	Site Graça	Luis Vaz Freire, Pedro Catarro	23 Nov 2021/09:00
Field verification of SBE	João Nunes & Filho, Lda; Florestalzezere, Lda.	Luis Vaz Freire, Pedro Catarro	23 Nov 2021/09:15
Lunch break	-	-	23 Nov 2021/12:30
Visit at port of Figueira da Foz	Figueira da Foz	Luis Vaz Freire, Pedro Catarro	23 Nov 2021/13:30
Final discussion / days closing meeting	Figueira da Foz	Luis Vaz Freire, Pedro Catarro	23 Nov 2021/17:45
Day's Opening meeting	New Pellets	Luis Vaz Freire, Pedro Catarro	24 Nov 2021/09:00

Checking the Supply Base Evaluation	New Pellets	Luis Vaz Freire, Pedro Catarro	24 Nov 2021/09:15
Lunch break	-	-	24 Nov 2021/12:30
Checking the Supply Base Evaluation	New Pellets	Luis Vaz Freire, Pedro Catarro	24 Nov 2021/13:30
Final discussion / days closing meeting	New Pellets	Luis Vaz Freire, Pedro Catarro	24 Nov 2021/17:45
Day's Opening meeting	New Pellets - Remote	Luis Vaz Freire	25 Nov 2021/09:00
Checking the Supply Base Evaluation	New Pellets - Remote	Luis Vaz Freire	25 Nov 2021/09:15
Lunch break	-	-	25 Nov 2021/12:30
Finalization SBE audit	New Pellets - Remote	Luis Vaz Freire	25 Nov 2021/13:30
Introduction into Supply Base	New Pellets - Remote	Luis Vaz Freire	25 Nov 2021/15:30
Supply Base report	New Pellets - Remote	Luis Vaz Freire	25 Nov 2021/16:00
Suppliers	New Pellets - Remote	Luis Vaz Freire	25 Nov 2021/16:45
Suppliers certificates	New Pellets - Remote	Luis Vaz Freire	25 Nov 2021/17:00
Final discussion / days closing meeting	New Pellets - Remote	Luis Vaz Freire	25 Nov 2021/17:45

Day's Opening meeting	New Pellets - Remote	Luis Vaz Freire	26 Nov 2021/09:00
GHG data registrations	New Pellets - Remote	Luis Vaz Freire	26 Nov 2021/09:15
Lunch break	-	-	26 Nov 2021/12:30
GHG data registrations	New Pellets - Remote	Luis Vaz Freire	26 Nov 2021/13:30
Final discussion / days closing meeting	New Pellets - Remote	Luis Vaz Freire	26 Nov 2021/17:45
Day's Opening meeting	New Pellets - Remote	Luis Vaz Freire	29 Nov 2021/09:00
Document audit	New Pellets - Remote	Luis Vaz Freire	29 Nov 2021/09:15
Lunch break	-	-	29 Nov 2021/13:30
Document audit	New Pellets - Remote	Luis Vaz Freire	29 Nov 2021/14:30
Day Closing meeting	New Pellets - Remote	Luis Vaz Freire	29 Nov 2021/17:30

Auditor qualification		
Auditor name	**Role**	**Qualification**
Luis Vaz Freire	Lead auditor	Lead SBP, GGL, and FSC and PEFC FM/COC auditor and successfully passed the SBP auditor

Pedro Catarro	Expert	Degree in Forestry and Natural Resources Engineering

4.2 Description of evaluation activities

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. This audit was a combined SBP and FSC audit. After this introduction, all relevant requirements of the applicable SBP standard(s) were verified on compliance through the use of a report template and checklists. The audit was completed by filling in the audit report and discussing the audit results. During this closing meeting it was also discussed how evidence can be submitted of corrective action with respect to non-conformities that were identified.

· Names and affiliations of people interviewed

Name:	Affiliation:
Rui Rodrigues	New Pellets
Cristina Dinis	New Pellets
Giovanni Alencastro	Consultant
António Lopes	New Pellets
Silvino Figueiredo Fernandes	Pinho e Eucalipto Madeira, Lda.
Assis Martins	Field manager - New Pellets

Critical control points, summary

Identified CCP	Evaluation CCP
Sourcing and input check	Check prior to sending the material by supplier and check upon request
Reception and storage	Reception and storage of material based on credit control system.
Volume control	FSC Credit control system
Labelling	Trademark agreement signed 25/11/2021. No trademark use.
Invoicing and shipping	No sales to date. Certified materials are either SBP

	Controlled or SBP Compliant
Stakeholder Consultation	This is a surveillance audit, there was no stakeholder consultation.

4.3 Sampling methodology

During audit preparation, a sampling plan was developed based on the following criteria: - A review of documentation related to energy and carbon data for the chosen SAR reporting period. - An assessment of the DTS. - Inspection at the pellet plant and interviews with the team. As New Pellets currently has 2 potential suppliers, through the formula Y=0.6 SQR X (annual audit), 1 FMU where operations were taking place was visited to verify the mitigation measures implemented by the future supplier. 1 port was visited, the port of Figueira da Foz.

4.4 CB stakeholder engagement

Second Surveillance Audit. Therefore, there was no stakeholder consultation.

4.5 Stakeholder feedback

No comments received.

5 Results

5.1 Main strengths and weaknesses

Strengths: The audit of New Pellets demonstrated a good level of compliance with the required criteria of Standard 1, 2, 4 and 5. There was reasonable evidence provided to support compliance where a Non-Conformity was not detected. The existence of a FSC Chain of Custody system is considered a main strength with respect to New Pellets overall conformity with the relevant SBP standards. The company are also ENPlus certified.

Furthermore, New Pellets has implemented a robust Supplier Qualification Program and Mitigation Measures based on a SBE Portugal Risk Assessment produced by AIMMP.

With this tools BP started to go on field and developed a classification process of feedstock over the Risk Analysis to find Low Risk inputs. Also some FSC (and PEFC) inputs were bought as primary and secondary feedstock.

Weaknesses: Very small amount of certified material.

5.2 Rigour of Supply Base Evaluation

New Pellets has implemented a robust Supplier Qualification Program and Mitigation Measures based on a SBE Portugal Risk Assessment produced by AIMMP, which includes a clear description of their Supply Base Area. The geographical scope of the SBE is Continental Portugal. This SBE uses credible data sources. New Pellets 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 13 Indicators which were designated as specified risk. New Pellets has developed additional controls and mitigation measures to manage these risks. After the risk assessment was completed, mitigation measures were proposed and consulted with stakeholders. The stakeholder consultation process involved consultations to key stakeholders with regard to information on SBP certification, SBP risk assessment and supply base report, by communicating this via electronic email. As no comments were received, the organization has implemented the mitigation measures for the specified risk indicators. The risk mitigation measures have been designed and implemented planned in cooperation with acknowledged experts and external consultants in relevant fields.

5.3 Collection and communication of data

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

5.4 Competency of involved personnel

Internal staff members and one external consultant are involved in the SBP system management and implementation. All interviewed responsible staff demonstrated awareness of their responsibilities within

SBP system. The external Consultant who is contracted for forest matters, which includes sourcing the forest based material and field visits and reports for SBP Std.#1.

All involved personnel, including responsible staff at suppliers and sub-suppliers have demonstrated good knowledge in relevant fields (recognition and identification of HCVF, familiarity with health and safety requirements, timber origin verification) during the site visits. Relevant certificates and diplomas were presented during the assessment and scope change audits. Qualification requirements for personnel involved in the SBE system are provided in documented procedures of the BP. In overall, auditors evaluate the competency of main responsible staff to be sufficient for implementing the SBP system with both primary and secondary material sourced within the SBE. This has been based on interviews, review of qualification documents, training records and set of procedures and documents that were composed for the SBP system as well as field observations during the assessment and audits.

6 Review of company's risk assessments

6.1 Overview of company's risk assessments and mitigation measures

No Supplier Verification Program has been performed as no Unspecified Risks were identified. Mitigation Measures were applied to avoid feedstock with Specified Risks and exclude it form SBP-Compliant Biomass.

Control Union assessed the risk for each Indicator using the guidance in Section 11 of SBP Framework Standard 2: Verification of SBP-compliant Feedstock.

The risk assessment has been performed with the use of a technical expert and evaluated the risk at both regional and the individual forest level. Determining the risk rating the likely impact of a non-compliance together with the probability of that noncompliance arising was used.

6.2 Specified risk indicators and mitigation measures

Country/Area	Indicator	Specified risk description	Mitigation measure
Portugal	2.1.1 The BP has implemented appropriate control systems and procedures for verifying that forests and other areas with high conservation value in the Supply Base are identified and mapped.	There are specified risks that important species or habitats are not identified and mapped as following: - HCV 1.2 - Endangered species according to the classification adopted by the International Union for the Conservation of Nature (IUCN) to endangered species: critically endangered (CR), Endangered (EN) and vulnerable (VU). And also protected species contained in the legal conservation instruments in force in Portugal (Habitat and Birds Directives, CITES, Bern Convention, Bonn Convention), which may not be integrated into threat categories above; - HCV 1.3 -Endemic species - HCV 1.4 - Critical seasonal use areas including critical areas of refuge, breeding or migration routes in Portuguese territory, detailed above. HCV3- Areas included or containing rare ecosystems,	· Consultation of cartography and others information sources, and verification that forests and other areas with high conservation values (HCV), specifically HCV 1.2, HCV 1.3, HCV 1.4 and HCV 3, are identified and mapped; · Disqualify material coming from areas where high conservation values are not identified and mapped.

		threatened or endangered (classified as priority habitats by Natura 2000), found inside and outside classified areas. All the other areas are identified and mapped so they are low risk accoding to this indicator.	
Portugal	2.1.2 The BP has implemented appropriate control systems and procedures to identify and address potential threats to forests and other areas with high conservation values from forest management activities.	HCV 1- In private and communitarian forest areas classified by the National System of Classified Areas (SNAC) and in the forest areas considered IBAs (Important Bird and Biodiversity Areas), not covered by the National Network of Protected Areas RNAP, there are specified risks that HCV1 attributes are threatened by forest management operations such as harvesting or maintenance. HVC 3 - It is considered that the threats on priority habitats on private and communitarian, and public forest areas not managed by ICNF, are not properly safeguarded by existing safeguards, and so there is a specific risk that they were threatened by forest operations. HCV4 & HCV5 - It is considered specified the risk on private, communitarian, and public forest areas not managed by ICNF, subject to exploitation by clear cutting at dimensions above to the maximum area indicated for each region by PROF Regional Forestry Management Plan.	· Consultation of information sources regarding HCVs; · Procedures for conduct specific field Inspections to identify and address real and potential threats to forests and other areas with high conservation values, specifically HCV 1, HCV 2, HCV 3 and HCV 4, which were previously identified and mapped; · Disqualify material coming from areas where forest management and operations represent evident threats to HCV 1, HCV 2, HCV 3 and HCV 4; · Promotion of Good Forest Practices; · Monitoring plan.
Portugal	2.1.3 The BP has implemented appropriate control systems and procedures	Considering the absence of complete legislative requirements regulating the conversion of forests to plantation and the statistics about the area converted after	· Consultation of historical information sources and information from stakeholders; · Analysis of owner's information regarding the past and future area’s

	for verifying that feedstock is not sourced from forests converted to production plantation forest or non-forest lands after January 2008.	2008., it is considered a specified risk that feedstock is sourced from forests converted to production plantation forest or non-forest lands after January 2008.	covering and use; · Procedures to conduct monitoring field Inspections to verify if feedstock is or is not sourced from forests converted to production plantation forest or non-forest lands after January 2008; · Disqualify material coming from areas where natural forest were converted into Eucalyptus or other plantation from 2008, or to be converted with Eucalyptus or other plantation, or transformed into pasture, agriculture or other non-forest use; · Promotion of Good Forest Practices; · Monitoring plan.
Portugal	2.2.1 The BP has implemented appropriate control systems and procedures to verify that feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them.	There are specified risks that feedstock is sourced from forests where there is no appropriate assessment of impacts, when clear cuttings are done over a specific size area. This specific area is defined regionally by each Regional Forest Plan (PROF), as the maximum clearcutting area or the size of even aged monoespecific forest stand. This risk is associated to private and communitarian, and public forest properties not managed by Forest Services (ICNF).	· Consultation of information sources and legislation regarding impact assessment; · Analysis of information from the area regarding social and environmental aspects; · Procedures for conduct field Inspections to verify social and environmental aspects and the appropriate assessment, planning and implementation of measures for minimise real or potential impacts, especially in case of clear cuttings made over a specific size area, defined regionally by each Regional Forest Plan (PROF), as the maximum clearcutting area or the size of even aged monoespecific forest stand; · Disqualify material coming from areas where no appropriate assessment of impacts, and planning, implementation and monitoring to minimise them, is confirmed; · Promotion of Good Forest Practices; · Monitoring plan.

Portugal	2.2.2 The BP has implemented appropriate control systems and procedures for verifying that feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b)	It is considered specified the risks for soil quality of sourcing biomass feedstock on: -forest lands located on desertification susceptible area according to Forest Services (ICNF) cartography. and - with size above minimum size required for Forest Management Plan.	· Consultation of information sources and legislation related with soil aspects; · Analysis of information from the area regarding soil erosion; · Procedures for conduct field Inspections to verify if forest management maintains or improves soil quality, especially in forest lands located on desertification susceptible area according to Forest Services (ICNF) cartography and with size above minimum size required for Forest Management Plan in respective PROF; · Disqualify material coming from areas where is confirmed that forest management do not maintains or improves soil quality; · Promotion of Good Forest Practices; · Monitoring plan.
Portugal	2.2.3 The BP has implemented appropriate control systems and procedures to ensure that key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).	HCV 1- In private and communitarian forest areas classified by the National System of Classified Areas (SNAC) and in the forest areas considered IBAs (Important Bird and Biodiversity Areas), not covered by the National Network of Protected Areas RNAP, there are specified risks that HCV1 attributes are threatened by forest management operations such as harvesting or maintenance. HVC 3 - It is considered that the threats on priority habitats on private and communitarian, and public forest areas not managed by ICNF, are not properly safeguarded by existing safeguards, and so there is a specific risk that they were threatened by forest	· Consultation of information sources regarding biodiversity; · Analysis of information from the area regarding biodiversity; · Procedures for conduct specific field Inspections to identify and address real and potential threats to conservation of key ecosystems and habitats; · Disqualify material coming from areas where forest management and operations represent evident threats to conservation of key ecosystems and habitats; · Promotion of Good Forest Practices; · Monitoring plan.

		operations. HCV4 & HCV5 - It is considered specified the risk on private, communitarian, and public forest areas not managed by ICNF, subject to exploitation by clear cutting at dimensions above to the maximum area indicated for each region by PROF Regional Forestry Management Plan.	
Portugal	2.2.4 The BP has implemented appropriate control systems and procedures to ensure that biodiversity is protected (CPET S5b).	It is considered that a significant part of biodiversity is covered and detailed by indicators 2.1.1 and 2.1.2, for which low risk was not reached in this risk assessment. All classified habitats, besides priority ones included on HCV, must be included in this indicator.	· Consultation of information sources regarding biodiversity; · Analysis of information from the area regarding biodiversity; · Procedures for conduct specific field Inspections to identify and address real and potential threats to protection of biodiversity; · Disqualify material coming from areas where is confirmed that forest management and operations do not ensure that biodiversity is protected; · Promotion of Good Forest Practices; · Monitoring plan.
Portugal	2.2.6 The BP has implemented appropriate control systems and procedures to verify that negative impacts on ground water, surface water and water downstream from forest management are minimised (CPET S5b).	It is considered a specified risk for water impacts the exploitation by clear cutting at dimensions above to the maximum area indicated for each region by PROF Regional Forestry Management Plan. This risk is appliedto all private, communitarian, and public forest areas which are not managed by ICNF.	· Consultation of information sources and legislation related with water; · Analysis of information from the area regarding soil erosion; · Procedures for conduct field Inspections to verify if forest management maintains or improves soil quality, especially in case of clear cuttings at dimensions above to the maximum area indicated for each region by PROF (Regional Forestry Management Plan), in areas which are not managed by ICNF; · Disqualify material coming from areas where is confirmed that forest management do not minimise negative impacts on ground water,

			surface water and water downstream; · Promotion of Good Forest Practices; · Monitoring plan.
Portugal	2.4.1 The BP has implemented appropriate control systems and procedures for verifying that the health, vitality and other services provided by forest ecosystems are maintained or improved (CPET S7a).	Thus while it seems clear that Portuguese government has taken steps to address the problem, with actual information available this indicator needs to be assessed as specified risk for health and vitality of forests ecosystems.	· Consultation of information sources regarding biotic and abiotic risks for the ecosystems services; · Analysis of information from the area regarding biotic and abiotic risks; · Procedures to access information from the area regarding biotic and abiotic risks, and procedures for conduct monitoring field Inspections to verify ecosystems services, social and environmental aspects and the appropriate assessment, planning and implementation of measures for minimise real or potential risks and impacts; · Disqualify material coming from areas where health, vitality and other services provided by forest ecosystems are not maintained or improved; · Promotion of Good Forest Practices; · Monitoring plan.
Portugal	2.4.2 The BP has implemented appropriate control systems and procedures for verifying that natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b).	Pests, diseases and fires are today the greatest perceived risks in the Portuguese forest sector. Specified risk is assessed on the fire management at forest level.	· Consultation of information sources and legislation regarding natural processes (fires, pests, invasive species, and diseases); · Analysis of information from the area regarding invasive species, diseases, resources for fire prevention and protection; · Procedures for conduct field Inspections to verify these aspects if necessary; · Disqualify material coming from areas where natural processes, such as fires, pests and diseases, are

			not managed appropriately; · Promotion of Good Forest Practices; · Monitoring plan.
Portugal	2.5.1 The BP has implemented appropriate control systems and procedures for verifying that legal, customary and traditional tenure and use rights of indigenous people and local communities related to the forest, are identified, documented and respected (CPET S9).	In the ground situations of use and abuse of fences and inadequate signs are common, including closed gates. In those situations, it is believed that customary rights are not respected, and there is a specified risk on this indicator. This specified risk doesn’t include the licensed catle parks or big game hunting areas.	· Analysis of information from the area regarding use and abuse of fences and inadequate signs and closed gates; · Procedures for conduct field Inspections to verify these aspects if necessary; · Disqualify material coming from areas where is confirmed the use and abuse of fences and inadequate signs and closed gates in a way that customary rights are not respected (except in case of licensed catle parks or big game hunting areas); · Promotion of Good Forest Practices; · Monitoring plan.
Portugal	2.8.1 The BP has implemented appropriate control systems and procedures for verifying that appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12).	Historically, a risk under this category has been present based on a low level of compliance with the requirements for accreditation and/or professional training. Portugal has a rating of 3 in the International Trade Union Confederation Global Rights Index. This score is given for countries where "there are Regular violation of rights. The government and/or companies are regularly interfering in collective labour rights. There are deficiencies in laws and/or certain practices which make frequent violations possible.”	· Suppliers training and qualification; · Confirmation of legal status of qualified suppliers in relation with health and safety requirements. · Procedures for conduct monitoring field Inspections to verify all the aspects related with health and safety of forest workers; · Disqualify material coming from areas where there are insufficient or inappropriate safeguards to protect the health and safety of forest workers; · Promotion of Good Forest Practices; · Monitoring plan.

Portugal	2.9.1 Feedstock is not sourced from areas that had high carbon stocks in January 2008 and no longer have those high carbon stocks.	This indicator is assessed as specified risk in: - Wetlands: felling of riparian vegetation affecting carbon stocks - Old mature forests: felling/conversion of old mature oak stands after 2008	· Consultation of information sources regarding high carbon stocks areas (wetlands, peatlands and old mature forests stands); · Analysis of information from the area regarding the riparian vegetation and old mature forests stands; · Procedures for conduct monitoring field Inspections to verify if biomass is sourced from areas that had high carbon stocks in January 2008 and no longer have those high carbon stocks; · Disqualify material coming from areas that had high carbon stocks in January 2008 and no longer have those high carbon stocks; · Promotion of Good Forest Practices; · Monitoring plan.

7 Non-conformities and observations

N/A

8 Certification decision

Based on the auditor’s recommendation and the Certification Body’s quality review, the following certification decision is taken:	
Certification decision:	Certification approved
Certification decision by (name of the person):	Andries Polinder
Date of decision:	04 Mar 2022
Other comments:	N/A