Supply Base Report:

Aktieselskabet Rold Skov Savværk A/S
Third 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:	Aktieselskabet Rold Skov Savværk A/S
Producer address:	Viborgvej 930, 8471 Sabro, Denmark
SBP Certificate Code:	SBP-05-23
Geographic position:	56.228400, 9.949900
Primary contact:	Benno Laursen, +45 9940 4060 or +45 4011 7039, bl@roldskov.dk
Company website:	
Date report finalised:	31 Oct 2025
SBR reporting period from:	01 Jul 2024
SBR reporting period to:	30 Jun 2025
Name of the Certification Body:	DNV Business Assurance Finland Oy Ab
Certification Body Approval date:	01 Nov 2025
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 5E: Collection and Communication of Energy and Carbon data. v2.1, Instruction Document EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413
Feedstock origin (countries)	Norway (Entire country), Denmark (Entire Country)
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

Rold Skov Savværk A/S is one of Denmark's largest groups of softwood sawmills for cutting construction wood with sales to both the Danish and other European countries' construction sector. Rold Skov Sawmill is located in the central/eastern part of Jutland with two sawmill units, one in Sabro near Aarhus and one in Arden near Randers. The two sawmills are structured differently. This means that different products are produced at the two sawmills, which makes it possible to offer clients different products within construction wood, packaging wood, etc. Both the sawmills in Arden and Sabro sell by-products such as wood chips and sawdust for biomass use.

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

Number of employees: *54*

Annual maximum production capacity (metric tonnes): *80000*

Number of direct feedstock suppliers: *0*

Approximate number of feedstock sub-suppliers: *20*

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

Rold Skov Savværk produces biomass from processing residues generated by our two sawmills only. Primary feedstock for the sawmills are sourced in Denmark and Norway EXW forest road. From Denmark Rold Skov Sawmill buys certified and not-certified wood. From Norway only wood that is PEFC and FSC CW is sourced. Rold Skov only produces SBP certified biomass.

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	Norway
Area/Region	Entire country
Exclusions	
Feedstock types	Processing residues
Feedstock Product Groups	Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock
Is the forest managed to supply energy and non-energy markets?	Yes - Minority
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)	N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme
Provide a concise summary of why a SBE was determined to be required or not required here:	
Processing residue originate from biomass producers own sawmills, but sawmill logs originates from Norway and are PEFC and FSC CW certified. For these input types there is no need for supply base evaluation.	
Feedstock types included in SBE:	N/A
Includes EU RED SBE:	No
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	No
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	38.5000
Map(s) of the Supply Base area:	
	

Country	Denmark
Area/Region	Entire Country
Exclusions	
Feedstock types	Processing residues
Feedstock Product Groups	Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock
Is the forest managed to supply energy and non-energy markets?	Yes - Minority
For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5	Yes - Majority

years of felling?	
Risk assessment(s)	Yes – Regional Risk Assessment (RRA) used, N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme
Provide a concise summary of why a SBE was determined to be required or not required here:	
Processing residue originate from biomass producers own sawmills, but some sawmill logs originates uncertified forest and others from PEFC/FSC certified forests. For the uncertified forest feedstock SBE is required. For the SBE the Danish RRA has been used and on this basis Risk Managment Measures have been produced. The biomass producer wish that all biomass is SBP-compliant and therefore an SBE has been conducted. For logs originating from FSC and PEFC certified forests no SBE is required.	
Feedstock types included in SBE:	Processing residues
Includes EU RED SBE:	Yes
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	No
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	4.3000
Map(s) of the Supply Base area:	



2.3 Feedstock information

a. **Total volume of Feedstock:** 1-200,000 m3

b. **Volume of primary feedstock:** 1-200,000 m3

c. **List of all the species in primary feedstock, including scientific name:**

Picea abies	Norway spruce
Picea sitchensis	Sitka spruce
Picea omorika	Omorika spruce
Abies alba	Fir Abies Alba
Abies grandis	Grandis
Abies procera	Nobilis
Larix spp	Larch

d. **Was the feedstock used in the biomass removed from a forest as part of a pest/disease control measure or a salvage operation?** No

Explanation:

e. **Hardwood (i.e. broadleaf trees): specify proportion of feedstock from (%)**: 0.00

f. **Softwood (i.e. coniferous trees): specify proportion of feedstock from (%):** 100.00

g. **Proportion of feedstock composed of or derived from saw logs by weight (%):** 100.00

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 (%):** 50.00

j. **Select forest type(s) where the primary feedstock was sourced from:** Planted Forest

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:** 1-200,000 m3
Physical form of the feedstock: Chips, Sawdust, Other (specify)

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

15.00 % FSC

85.00 % PEFC

o. **Volume of post-consumer feedstock:** 0
Physical form of the feedstock: Chips, Sawdust, Other (specify)

p. **Estimated amount of EU RED-compliant sustainable feedstock that could be collected annually by the BP:** 400000 m3

q. **What is the estimated amount of EU RED-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated):** 15750000.00 m3

Explanation: DK, annual increment according to NFI: 7.4 mio m3 (2023) NO, annual increment according to NFI: 24.1 mio m3 (2021) TOTAL: 31.5 mio m3 Assuming 50% could be harvested this is: 15.75 mio m3

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

For primary feedstock (logs) used for processing residue (from the biomass producer sawmill) feedstock from Denmark not certified to an SBP-recognised certification scheme (uncertified, RBP/WSP verified and FSC CW feedstock) the Danish Regional Risk Assessment for forest is used.

PEFC and FSC certified logs from Denmark and Norway is also used as inputs but exempt from Supply Base Evaluation as feedstock is processing residue.

3.2 Conflicts with applicable national and sub-national legislation

No conflicts with applicable national and sub-national legislation has been encountered.

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: The entire country fredskov and non-fredskov	
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:
There is a specified risk that at least locally-important key biotopes in forests have not yet been identified and mapped so these may therefore be at risk from threats due to the sourcing of biomass. This is irrespective of their coverage by the Forest Act.
Mitigation measure:
Rold Skov Savværk's Standard Operating Procedures are all based on the sawmills only sourcing and processing coniferous tree species mainly grown in monocultural plantations. In order to mitigate the risk and identify key biotopes the the following procedures are implemented: **SBP #3 FSC-PEFC deliveries from Danmark and Norway** Includes checklists of • Valid certificates, contracts, supplier documentation for said claims. • Valid FSC/PEFC Coc certificate. • Accepted claims: 100% PEFC or FSC 100% or FSC mix credit • No SBE required **SBP #4 non-certified deliveries from Danmark** Includes checklists of Identification and protection of HCV´s and retention of deadwood • Valid FSC CW certificates, contracts, supplier documentation for said claims, (screening of area included in documentation) or • WSP or RBP evaluations, contracts, supplier documentation for said claims (screening of area included in documentation) , or • Green Management Plan with HCV protection, or • Rold Skov Savværk project screening with HCV protection (+ control of thresholds for clearcuts and retention of deadwood, protection of no-go areas) or • Wood originates from coniferous plantation (screening of area included in documentation) .
Monitoring and outcomes:
Risk management measures include monitoring by internal audits on a 3-monthly basis, including audit reports with non-conformances, corrective actions and follow up, - sampling frequency: 0,6 X Sqrt of number of deliveries (invoices). Rold Skov Savværk conducts yearly monitoring of forest NFI for development of increment in Danish forests for 5 year periods. All Danish regions from where Rold Skov Savværk sources are checked. If a negative development is found Rold Skov Savværk will only accept wood from forests covered by the Forest Act.

Country: Denmark	
Area/sub-scope: The entire country fredskov and non-fredskov	
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:	
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.	
Mitigation measure:	
Rold Skov Savværk's Standard Operating Procedures are all based on the sawmills only sourcing and processing coniferous tree species mainly grown in monocultural plantations. In order to mitigate the risk of negative threats and impacts on key species, habitats, ecosystems, and areas of HCV pertaining to biodiversity the following procedures are implemented: **SBP #3 FSC-PEFC deliveries from Danmark and Norway** Includes checklists of • Valid certificates, contracts, supplier documentation for said claims. • Valid FSC/PEFC Coc certificate. • Accepted claims: 100% PEFC or FSC 100% or FSC mix credit • No SBE required **SBP #4 non-certified deliveries from Danmark** Includes checklists of Identification and protection of HCV´s and retention of deadwood • Valid FSC CW certificates, contracts, supplier documentation for said claims, (screening of area included in documentation) or	

- WSP or RBP evaluations, contracts, supplier documentation for said claims (screening of area included in documentation) , or
- Green Management Plan with HCV protection, or
- Rold Skov Savværk project screening with HCV protection (+ control of thresholds for clearcuts and retention of deadwood, protection of no-go areas) or
- Wood originates from coniferous plantation (screening of area included in documentation).

Monitoring and outcomes:

Risk management measures include monitoring by internal audits on a 3-monthly basis, including audit reports with non-conformances, corrective actions and follow up, - sampling frequency: 0,6 X Sqrt of number of deliveries (invoices).

Rold Skov Savværk conducts yearly monitoring of forest NFI for development of increment in Danish forests for 5 year periods. All Danish regions from where Rold Skov Savværk sources are checked. If a negative development is found Rold Skov Savværk will only accept wood from forests covered by the Forest Act.

Country: Denmark

Area/sub-scope: The entire country fredskov and non-fredskov

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:

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:
The BP has implemented mitigaton measures by checking for HCV´s, old-growth and primary forest as follows: **SBP #4 Ikke-cert deliveries from Danmark** Includes checklists of Identification and protection of HCV´s and retention of deadwood • Valid FSC CW certificates, contracts, supplier documentation for said claims, (screening of area included in documentation) or • WSP or RBP evaluations, contracts, supplier documentation for said claims (screening of area included in documentation) , or • Green Management Plan with HCV protection, or • Rold Skov Savværk project screening with HCV protection (+ control of thresholds for clearcuts and retention of deadwood, protection of no-go areas) or • Wood originates from coniferous plantation (screening of area included in documentation) EU RED requirements • Signed and enforced contracts securing maximum thresholds for clearcuts and retention of deadwood and protection of no-go areas (primary forests and old growth forests). • Statement of assurance
Monitoring and outcomes:
Risk management measures include monitoring by internal audits on a 3-monthly basis, including audit reports with non-conformances, corrective actions and follow up, - sampling frequency: 0,6 X Sqrt of number of deliveries (invoices). Rold Skov Savværk conducts yearly monitoring of forest NFI for development of increment in Danish forests for 5 year periods. All Danish regions from where Rold Skov Savværk sources are checked. If a negative development is found Rold Skov Savværk will only accept wood from forests covered by the Forest Act.

Country: Denmark	
Area/sub-scope: The entire country fredskov and non-fredskov	
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:	
1.1.1 Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.	
Description of the specific risk:	
There is a risk that forests that are not covered by the Forest Act can supply biomass to bioenergy producers of capacity 2.5 MW or below without complying with all EU REDII requirements. Therefore, it is concluded that the risk class for Indicator 1.1.1 is 'low risk' for forests covered by the Forest Act and 'specified risk' for forests not covered by the Forest Act.	
Mitigation measure:	
Rold Skov Savværk complies with all relevant legislation and implement all mitigation measures irrespective of the size of the bioenergy producer which it sources to.	
Monitoring and outcomes:	
Risk management measures include monitoring by internal audits on a 3-monthly basis, including audit reports with non-conformances, corrective actions and follow up, - sampling frequency: 0,6 X Sqrt of number of deliveries (invoices). Rold Skov Savværk conducts yearly monitoring of forest NFI for development of increment in Danish forests for 5 year periods. All Danish regions from where Rold Skov Savværk sources are checked. If a negative development is found Rold Skov Savværk will only accept wood from forests covered by the Forest Act.	

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

	☐SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment

Indicator with specified risk:

2.1.3 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.

Description of the specific risk:

This indicator is is interlinked with indicators 2.1.1 and 2.1.2. This means that there are unassessed threats connected to these unmapped and unidentified HCV areas. Without assessing the threats, it is hard to maintain or enhance key species.

Mitigation measure:

Rold Skov Savværk's Standard Operating Procedures are all based on the sawmills only sourcing and processing coniferous tree species mainly grown in monocultural plantations.

In order to mitigate the risk and maintain or enhance the key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity the following procedures are implemented:

SBP #3 FSC-PEFC deliveries from Danmark and Norway
Includes checklists of

- Valid certificates, contracts, supplier documentation for said claims.
- Valid FSC/PEFC Coc certificate.
- Accepted claims: 100% PEFC or FSC 100% or FSC mix credit
- No SBE required

SBP #4 non-certified deliveries from Danmark
Includes checklists of Identification and protection of HCV´s and retention of deadwood

- Valid FSC CW certificates, contracts, supplier documentation for said claims, (screening of area included in documentation) or
- WSP or RBP evaluations, contracts, supplier documentation for said claims (screening of area included in documentation) , or
- Green Management Plan with HCV protection, or
- Rold Skov Savværk project screening with HCV protection (+ control of thresholds for clearcuts and retention of deadwood, protection of no-go areas) or
- Wood originates from coniferous plantation (screening of area included in documentation).

Monitoring and outcomes:

Risk management measures include monitoring by internal audits on a 3-monthly basis, including audit reports with non-conformances, corrective actions and follow up, - sampling frequency: 0,6 X Sqrt of number of deliveries (invoices).

Rold Skov Savværk conducts yearly monitoring of forest NFI for development of increment in Danish forests for 5 year periods. All Danish regions from where Rold Skov Savværk sources are checked. If a negative development is found Rold Skov Savværk will only accept wood from forests covered by the Forest Act.

Country: Denmark	
Area/sub-scope: The entire country fredskov and non-fredskov	
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:	
There are examples of small biotopes, i.e. lakes, bogs, heaths, salt marshes or beach swamps, fresh meadows, and biological grasslands that are to be found located in forests that are covered neither by the Forest Act nor by the Nature Protection Act so these are not systematically identified and mapped. Therefore, these areas can be considered to have a specified risk.	
Mitigation measure:	
Rold Skov Savværk's Standard Operating Procedures are all based on the sawmills only sourcing and processing coniferous tree species mainly grown in monocultural plantations. In order to mitigate the risk and protect ecosystems, their health, vitality, functions and services the following procedures are implemented: **SBP #3 FSC-PEFC deliveries from Danmark and Norway** Includes checklists of • Valid certificates, contracts, supplier documentation for said claims. • Valid FSC/PEFC Coc certificate.	

- Accepted claims: 100% PEFC or FSC 100% or FSC mix credit
- No SBE required

SBP #4 non-certified deliveries from Danmark
Includes checklists of Identification and protection of ecosystems, their health, vitality and functions by:

- Valid FSC CW certificates, contracts, supplier documentation for said claims, (screening of area included in documentation) or
- WSP or RBP evaluations, contracts, supplier documentation for said claims (screening of area included in documentation) , or
- Green Management Plan with HCV protection, or
- Rold Skov Savværk project screening with HCV protection (+ control of thresholds for clearcuts and retention of deadwood, protection of no-go areas) or
- Wood originates from coniferous plantation (screening of area included in documentation).

Monitoring and outcomes:

Risk management measures include monitoring by internal audits on a 3-monthly basis, including audit reports with non-conformances, corrective actions and follow up, - sampling frequency: 0,6 X Sqrt of number of deliveries (invoices).

Rold Skov Savværk conducts yearly monitoring of forest NFI for development of increment in Danish forests for 5 year periods. All Danish regions from where Rold Skov Savværk sources are checked. If a negative development is found Rold Skov Savværk will only accept wood from forests covered by the Forest Act.

Country: Denmark

Area/sub-scope: The entire country fredskov and non-fredskov

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:
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. In particular, in non-fredskov (forests not covered by the Forest Act) harvesting levels are not required by any legislation to be sustained regarding inventory and growth data. Based on this 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:
Once a year, forest statistics on growth trends in Danish forests must be checked for the most recent five-year period. The regions in Denmark that supply Rold Skov Sawmill must be examined. The latest available statistics can be found here:Up to 2023: https://ign.ku.dk/samarbejde-med-ign/forskningsbaseret-raadgivning/skovovervaagning/danmarks-skovstatistik/From 2024 onward: https://mst.dk/nyheder/2024/marts/aendret-organisering-af-skovovervaagningen If a negative trend is observed, Rold Forest will not receive timber from forests that are not subject to forest protection obligations. Additonally the following procedure apply: Procedure #7 replanting agreement Replanting, only relevant for clearfell operations • Fredskovspligt (Forest covered by the Forest Ac t) (replanting is law enforced) or • Non-fredskovspligt: Forest owner, sign a replanting agreement.
Monitoring and outcomes:
Risk management measures include monitoring by internal audits on a 3-monthly basis, including audit reports with non-conformances, corrective actions and follow up, - sampling frequency: 0,6 X Sqrt of number of deliveries (invoices). Rold Skov Savværk conducts yearly monitoring of forest NFI for development of increment in Danish forests for 5 year periods. All Danish regions from where Rold Skov Savværk sources are checked. If a negative development is found Rold Skov Savværk will only accept wood from forests covered by the Forest Act.

Country: Denmark	
Area/sub-scope: The entire country fredskov and non-fredskov	
Risk Assessment used:	
	☐SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim

	☐SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☒SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.10 Harvested areas shall be regenerated	
Description of the specific risk:	
Article 8 of the Danish Forest Act states that areas covered by the Act must support trees that are expected to form a fullheight stand with a closed canopy i.e. to reach maturity. The same article also states that tree stands cannot be felled before they have reached maturity and the area must meet the above requirements at the latest ten years after clearcutting. This implies that a harvested area (i.e. a clearcut) has to be regenerated. However, the Nature Protection Act does not have any such provision for regeneration. This means the forests not covered by the Forest Act are not required to be regenerated after harvesting.	
Mitigation measure:	
Rold Skov Savværk's Standard Operating Procedures are all based on the sawmills only sourcing and processing coniferous tree species mainly grown in monocultural plantations. In order to mitigate the risk of forest not covered by the Forest Act being replanted after clearfelling the following procedures apply: **SBP #3 FSC-PEFC deliveries from Danmark and Norway** Includes checklists of • Valid certificates, contracts, supplier documentation for said claims. • Valid FSC/PEFC Coc certificate. • Accepted claims: 100% PEFC or FSC 100% or FSC mix credit • No SBE required Procedure #7 replanting agreement Replanting, only relevant for clearfell operations • Fredskovspligt (Forest covered by the Forest Ac t) (replanting is law enforced) or • Non-fredskovspligt: Forest owner, sign a replanting agreement.	
Monitoring and outcomes:	

Risk management measures include monitoring by internal audits on a 3-monthly basis, including audit reports with non-conformances, corrective actions and follow up, - sampling frequency: 0,6 X Sqrt of number of deliveries (invoices).

Rold Skov Savværk conducts yearly monitoring of forest NFI for development of increment in Danish forests for 5 year periods. All Danish regions from where Rold Skov Savværk sources are checked. If a negative development is found Rold Skov Savværk will only accept wood from forests covered by the Forest Act.

4 Stakeholder engagement

4.1 General description

Biomass Producer's stakeholder engagement start date: 04 Sep 2025

Biomass Producer's stakeholder engagement end date: 04 Oct 2025

Total number of stakeholders contacted: 19

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

Stakeholder engagement letters were sent to 19 stakeholders listed on the Rold Skov Savværk Stakeholder list. The letter informed on the process of Rold Skov Savværk updating procedures for SBP V2 and on SBP in general. Stakeholders were encouraged to provide input to attached company mitigation measures and means of verification for identified risks relating to biomass sourcing. One stakeholder reply was received.

4.2 Response to stakeholder comments

Stakeholder description: AN Energi, CHP

Stakeholder comment: Risk mitigation measures and means of verification looks good, Subject to the verifier's approval, I have no comments.

Response to the stakeholder: Thank you, comments well received.

5 Report updates and approval

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

The SBR is updated including changes required for the transition from SBP version 1 to SBP version 2.

Name	Benno Laursen
Title	Management representative
Date of report approval	31 Oct 2025

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	Entire Country
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_v1.0 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	Level A is assessed by "SBP-RED-EU-DK-FOR_v1.0 RED level A for Denmark Forest" for forests covered by the Danish Forest Act Level B is assessed for forests not covered by the Danish Foret Act. Rold Skov Savværk has implemented Standard Operating Procedures including a replanting agreement to be signed by owners of forests not covered by the Forest Act. For RBP and WSP: All EU RED criteria are covered by these management systems and assured in different ways. Rold Skov requires compliance documentation to be available for each delivery and monitors the compliance on a quarterly basis.
(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_v1.0 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	According to the REDIII level A risk assessment (14.07.2025) the following parts of the criteria are assessed with level B: - maximum thresholds for large clear-cuts - locally and ecologically appropriate retention thresholds for deadwood extraction Rold Skov Savværk has implemented Standard Operating Procedures and monitoring for the supplying forests for maximum thresholds for large clear-cuts and for the retention of deadwood. Areas gets screened according to the biomass producers checklists. For RBP and WSP: All EU RED criteria are covered by these management systems and assured in different ways. Rold Skov requires compliance documentation to be available for each delivery and monitors the compliance on a quarterly basis.
(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	Level A is assessed by "SBP-RED-EU-DK-FOR_v1.0 RED level A for Denmark Forest" for forests covered by the Danish Forest Act Level B is assessed for forests not covered by the Danish Forest Act. Rold Skov Savværk has implemented Standard Operating Procedures for monitoring for the long-term production capacity for supplying forests. Rold Skov monitores annually regional increment, if increment is negative, no sourcing takes place from forests not covered by the Forest Act. For RBP and WSP: All EU RED criteria are covered by these

	management systems and assured in different ways. Rold Skov requires compliance documentation to be available for each delivery and monitors the compliance on a quarterly basis.
(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	(vi)1 Primary forest and Old-growth forest (no-go) Level B is assessed by "SBP-RED-EU-DK-FOR_v1.0 RED level A for Denmark Forest" for forests covered and not covered by the Danish Forest Act. Rold Skov Savværk has implemented Standard Operating Procedures and monitoring to ensure that biomass shall not (no-go), originate from primary and old-growth forest, this is part of the biomass producers checklist and monitoring system. For RBP and WSP: All EU RED criteria are covered by these management systems and assured in different ways. Rold Skov requires compliance documentation to be available for each delivery and monitors the compliance on a quarterly basis.
(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	Level B is assessed by "SBP-RED-EU-DK-FOR_v1.0 RED level A for Denmark Forest" for forests covered and not covered by the Danish Foret Act.

	Rold Skov Savværk has implemented Standard Operating Procedures and monitoring for uncertified forests including Green Management Plans or Project screening. This is part of the biomass producers checklist. For RBP and WSP: All EU RED criteria are covered by these management systems and assured in different ways. Rold Skov requires compliance documentation to be available for each delivery and monitors the compliance on a quarterly basis.
(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_v1.0 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	Level B is assessed by "SBP-RED-EU-DK-FOR_v1.0 RED level A for Denmark Forest" for forests covered and not covered by the Danish Foret Act. Rold Skov Savværk has implemented Standard Operating Procedures and monitoring to ensure that biomass shall not (no-go), originate from

	heathland. This is part of the biomass producers checklist including supplier declaration and monitoring system. Input from no-go areas is not accepted in any way. For RBP and WSP: All EU RED criteria are covered by these management systems and assured in different ways. Rold Skov requires compliance documentation to be available for each delivery and monitors the compliance on a quarterly basis.
(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_v1.0 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_v1.0 REDIII Level A for Denmark FOR
Level B management system at the level of the forest sourcing area	N/A
(vii) that installations producing biomass fuels from forest biomass, issue a statement of assurance, underpinned by company-level internal processes, for the purpose of the audits conducted pursuant to Article 30(3), that the forest biomass is not sourced from the lands referred to in point (vi).	
Type of Risk Assessment used	☒Level A – proof at national or sub-national level ☐Level B – management system at forest sourcing area level
Level A risk assessment description	Level A for Denmark: SBP-endorsed Regional Risk Assessment v2.0
Level B management system at the level of the forest sourcing	*Not applicable, requirement only applies to Level A*

area	

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

Rold Skov Sawmill uses its own processing residues in the form of wood chips, bark and sawdust for the production of biomass. The raw material comes exclusively from Rold Skov Sawmill's own two sawmills in Sabro and Arden, therefore further verification process of input being processing residues is not necessary. Compliance with SBP requirements for processing residues at the sawmills is monitored during annual internal audits and documented by a self-declaration signed by the production manager for each sawmill. It is verified that timber received for sawing complies with SBP requirements using implemented risk management procedures

Feedstock inspection and classification upon receipt

Since Rold Skov Sawmill produces the raw material for biomass (processing residue feedstock) in connection with sawing, the produced processing residue can always be inspected in specially designed silos/storage areas located by outbound conveyor belts from the production at both sawmills. No processing residue is accepted from other suppliers. Inspection and categorization (document control) is carried out when sawmill logs are received, i.e. that no energy wood logs are received.
Rold Skov sawmill has mass balance system to account for all input and output.

Supplier audit for processing residues and post-consumer feedstock

Internal audits are conducted for both Rold Skov Savværd sawmills in Arden and Sabro. Further, a selfdeclaration has been signed for each sawmill.

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).

Not Applicable (RED II TOF not included)

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).