

Supply Base Report: Blue Point Pellets Denmark ApS

Third Surveillance Audit

www.sbp-cert.org



Completed in accordance with the Supply Base Report Template Version 1.3

*For further information on the SBP Framework and to view the full set of documentation see
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1 Overview

Producer name: Blue Point Pellets Denmark ApS
 Producer location: Køge, Denmark
 Geographic position: 55° 27' 0" North, 12° 11' 0" East
 Primary contact: Manager John Allen
 Company website: <http://bluepointpellets.com>
 Date report finalised: 08/May/2019
 Close of last CB audit: 10/May/2019, Køge, Control Union
 Name of CB: Control Union
 SBP Standard(s) used: Standard 2 version 1.0
 Standard 4 version 1.0
 Standard 5 version 1.0 & Instruction Note 5a
 Weblink to Standard(s) used: <https://sbp-cert.org/documents>
 SBP Endorsed Regional Risk Assessment: Not applicable
 Weblink to SBE on Company website: <http://bluepointpellets.com/about/>

Indicate how the current evaluation fits within the cycle of Supply Base Evaluations				
Main (Initial) Evaluation	First Surveillance	Second Surveillance	Third Surveillance	Fourth Surveillance
☐	☐	X	☐	☐

2 Description of the Supply Base

2.1 General description

Blue Point Pellets Denmark ApS is wood pellet producer located in eastern Denmark, on the harbour of Køge. The plant started production in 2015 and produces 6mm and 8mm wood pellets to industrial and residential markets of 100,000mt for European clients.

Blue Point Pellets Denmark ApS sources raw materials for pellet production from a limited number of suppliers that include traders and integrated companies with their own forest holdings, sawmills and secondary products. The suppliers deliver to port though Blue Point Pellets Denmark ApS can manage shipping with their own agents. The countries of origin for the Blue Point Pellets Denmark ApS Supply Base are:

- Norway
- Spain
- Sweden
- Finland
- Belarus
- Denmark
- Poland (via Germany and secondary feedstock)

Blue Point Pellets Denmark ApS acts as the “trader” and not the “operator” according the EU Timber Regulation 995/2010 and is not the “consignee” or “first placer” on the market for non-EU materials sourced from Norway or Russia. Blue Point Pellets Denmark ApS does draw upon external expertise, where required, for compliance with EU Timber Regulation.

Blue Point Pellets Denmark ApS receives sawmill residues and chips from primary processors from FSC or PEFC certified Chain of Custody companies as SBP controlled or SBP compliant biomass. This Supply Base Report includes primary feedstock from Denmark for future planned purposes.

As a large proportion of feedstock is supplied from FSC or PEFC-certified chain-of-custody suppliers, the Supply Base addresses all potential inputs into the primary processor that are identified and recorded by Blue Point Pellets Denmark ApS.

The feedstock are summarized in Table 1. The proportions of feedstock are estimated and vary between production batches to reach optimum pellet quality.

Table 1: General Current Feedstock Inputs Summary

Feedstock Product Group	Country of Origin and within Supply Base Report	Estimated Proportion	Representative Softwood / Hardwood (deciduous) Mix	Potential species mix & applicable %
SBP-compliant secondary feedstock from primary processor	Norway	27%	>75% softwood	Norwegian Spruce (70%), Pine (30%)
SBP-compliant primary feedstock	Spain	19%	100% softwood	Maritime pine & Monterey pine (100%)
SBP-compliant secondary feedstock from primary processor	Sweden	8%	>75% softwood	Norwegian Spruce (50%), Pine (50%)
SBP-compliant secondary feedstock from primary processor	Finland	29%	>75% softwood	Norwegian Spruce (21%), Pine (79%)
FSC-compliant secondary feedstock from primary processor	Belarus	13%	>75% softwood	Norwegian Spruce (5%), Pine (95%)
FSC-Compliant Tertiary feedstock	Denmark	1%	>85% softwood	Norwegian Spruce (30%), Pine (30%), Birch (Betula spp) (10%), Aspen (10%), Alder (10%), Oak (5%), Birch (Fagus sylvatica) (5%)
SBP-compliant secondary feedstock from primary processor	Germany (Inc. Poland as raw material input into the wood processing facility)	3%	50% softwood	Birch (Fagus sylvatica) (65%) Norwegian Spruce (35%)

2.2 Norway

Overview

Residues from sawmills are sourced by Blue Point Pellets Denmark ApS from primary processors in Norway. The Supply Base includes all sawmill residues to primary processors in Norway and a supplier of chipped primary feedstock. All feedstock from Norway is SBP compliant biomass. Over 90% of productive forest lands in Norway are PEFC certified and many forests have both FSC and PEFC certification.

Statistics for non-domestic wood biomass used in energy or the Government or academia in Norway does not report heat generation. Nor is an accurate value for the scale of biomass in relation to other industries available.

Pulpwood is regarded as low-quality energy wood that is not sawlogs. Pulpwood in Norway is for the well-established paper industry but also used as a biomass fuel. A supplier to Blue Point Pellets Denmark ApS processes primary wood, stemwood, into chips. Residues of sawlogs from sawmills are sourced by Blue Point Pellets Denmark ApS.

Removals of pulpwood account for nearly 40%¹ of the total commercial harvest in Norway. Sawmills consume more than 52% of roundwood logs harvested in Norway².

Domestic biomass use for household heating is a substantially greater proportion of wood use than pulpwood³. The conclusion can be made that non-domestic biomass is not a significant proportion of wood use in Norway. Sawmills are reported to receive more than 50% of commercial removals⁴. Overall, this indicates biomass is a minor proportion of the wood industry in Norway at present.

Forest Cover, Land Use, Economics and Forest Based Policy

Approximately 37% of the surface area of Norway is covered by forest. Twenty-five percent of Norwegian land area is productive forest. Latest available figures (2011) state that growing stock of timber as 878 million cubic metres. The annual increment was almost 25 million cubic metres. In 2011, forest owners cut 8.5 million cubic metres of industrial roundwood for sale, 2.5 million cubic metres for household logs⁵. The total forested area amounts to 12 million hectares, including 7.4 million hectares of productive forest⁶. An estimated 15% of the productive forest land has been designated as non-economic due to difficult terrain and long-distance transport. This means economical forestry may be operated in 75% of the forested area. The most important species are Norway spruce (47%), Scots pine (33%) and Birch (18%). Standing volume of forest is approximately 600 million cubic metres, compared with 300 million when the first national forest survey was carried out in 1919. The tremendous increase is a result of a forest policy with the main objective of restoring the forest resources. Each year the standing forest volume increases by approximately 20 million cubic metres through tree growth. The total annual harvest is less than 50% of this growth, which again means that the forest volume increases every

¹ <https://www.ssb.no/en/jord-skog-jakt-og-fiskeri/statistikker/skogav/aar-endelige/2015-12-21>

² <http://www.nordictimber.org/forest-industry-in-norway>

³ 1.2 million tonnes of fuel wood was burned: <https://www.ssb.no/en/energi-og-industri/statistikker/energibalanse/aar-forelopige/2016-05-20> (Nearly 4 million tonnes of commercial removals, household wood almost 1 million tonnes is 1/4 commercial removal volumes)

⁴ <https://www.ssb.no/en/jord-skog-jakt-og-fiskeri/statistikker/skogav/aar-endelige/2015-12-21?fane=tabell&sort=nummer&tabell=250460>

⁵ <https://www.ssb.no/en/jord-skog-jakt-og-fiskeri/artikler-og-publikasjoner/landbruket-i-norge-2011>

⁶ <http://www.pefc.org/component/pefcnationalmembers/?view=pefcnationalmembers&Itemid=48/16-Norway>

year. The variety of small-scale forestry creates good conditions for environmental biodiversity. Felling areas are 1.4 hectares on average, with long-rotation between harvesting⁷.

In Norway, the vast majority of forests are conifer-dominant and owned by private individuals/families where the forest has been handed down over generations. Norwegian forest resource policies are based on principles of maintaining the long-term stability and resilience of the resource base. The goal of Norwegian forest management policies is to meet social, economic, ecological and cultural needs for present and future generations. Norway has ratified the Rio Convention on Biological Diversity 1992 and sustainable management of Europe's forests. The principles expressed in these documents are also incorporated into Norwegian forest policy.

Protected Areas

CITES⁸ species are present in Norway but do not include threatened softwood or deciduous (broadleaf species) trees. Norway has a significant number of IUCN Categories. Protected Areas Categories and locations are indicated in the European Environment Agency Map:

⁷ Soil Association FSC FM Reports

⁸ <https://cites.org/eng/cms/index.php/component/cp/country/NO>

Figure 1. Protected Sites, Natura 2000 Map for Norway, Sweden and Finland.

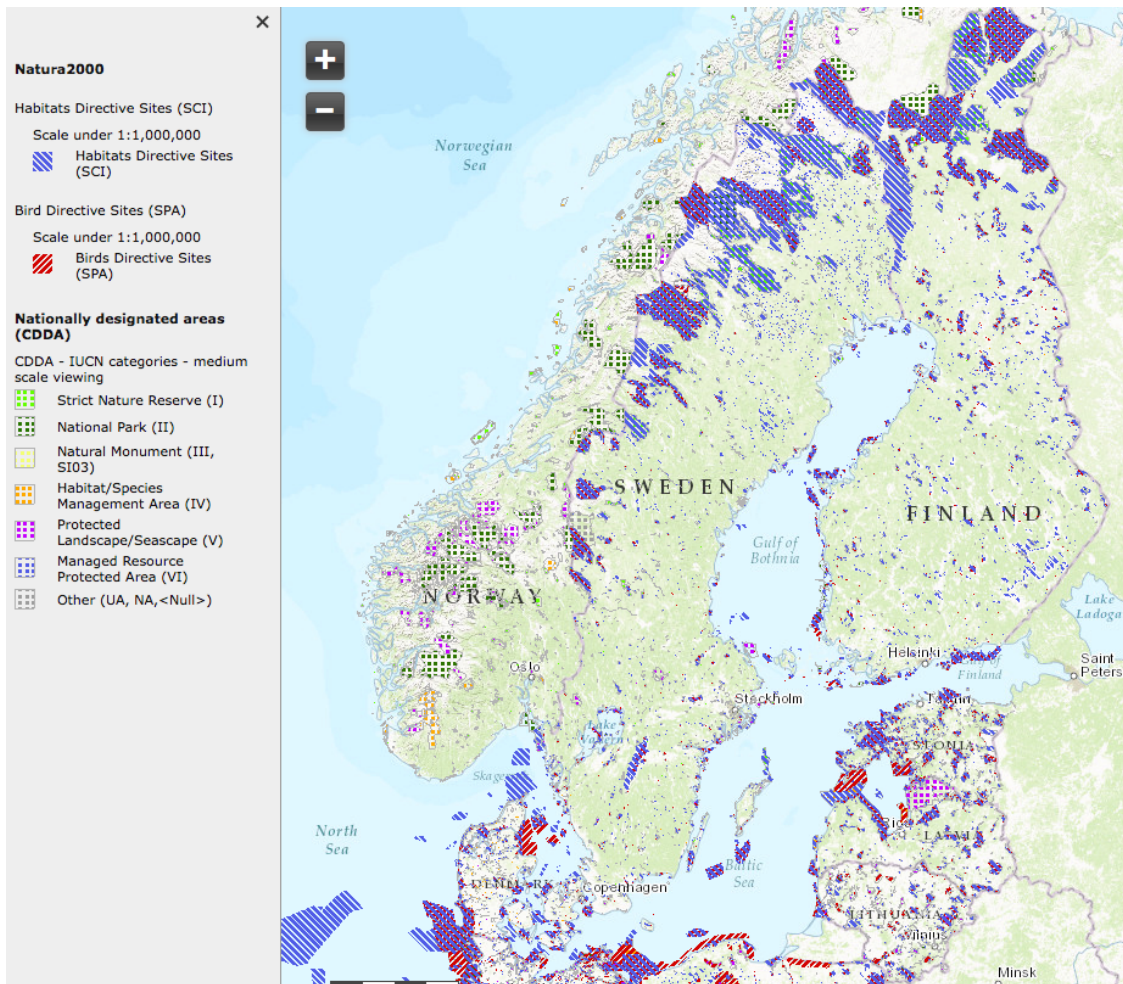


Figure 2. Protect WDPA (World Database of Protected Areas Map of N Europe including Norway)



Lands protected under The Forestry Act 2005⁹

- Areas of special environmental or recreational value – areas in which forest operation are subject to severe restrictions. Applied to approximately 170,000 ha.
- Protection forest – forestland that must be treated with special care due to their location or characteristics. Applied to approximately 20% of Norway's forestland¹⁰.

Statistics on protected areas under Norway's The Nature Conservation Act 1970:¹¹

National parks: 29. Total area: 27,756,000 ha.

Landscape protection areas: 174. Total area: 15,093,000 ha.

⁹ <http://www.lexadin.nl/wlg/legis/nofr/eur/lxwenoo.htm>

¹⁰ <http://www.pefc.org/component/pefcnationalmembers/?view=pefcnationalmembers&Itemid=48/16-Norway>

¹¹ Soil Association FSC FM Reports

Nature reserves: 1,790. Total area: 4,193,000 ha.
Nature monuments: 103. Total area: 2,000 ha.
Other protection areas: 118. Total area: 126,000 ha.
Total: 47,170,000 ha ~ 10.5% protected under the Nature Conservation Act.

Norway has formally adopted a Red List classification of species in accordance with criteria from the International Union for Conservation of Nature (IUCN)¹². A large proportion of the Red List species found in forests are associated with rich broad-leaved forest, however this makes up only 1% of Norway's productive forest land.¹³ Feedstock are from conifer-dominated habitats, thus the risk of feedstock affecting Red List species is inherently low and Norway's adoption of protected areas classifications provides further protection.

Reported threats to any Red List species are not from forestry or farming practices. Land Use Change (LUC) provides the greatest threat¹⁴, an example being construction activities.¹⁵ Norway is party to several international agreements that deal with the protection of threatened species and cover forestry and land management practices. The most important of these are the Convention on Biological Diversity, the Bern Convention, the CITES Convention and the Ramsar Convention.

2.3 Spain

Overview

The feedstocks sourced from the north of Spain; Galicia, Asturias and Leon. The Spanish forest area represents 54.8% of the national territory, 27.7M ha. Spanish forests are growing per year with an incremental increase of 2.2% per year and overall, at present, Forests cover 18.4M ha, covering 36.3% of its territory.

Spain has the third largest extension of tree-covered forest area in the EU, equivalent to 0.4 ha per capita. On the other hand, Spain has 9.3 M ha of treeless area, covering 18.5% of its national territory that are defined as four distinct vegetation types corresponding to regions: Atlantic, Mediterranean, Macaronesian and Alpine with notably differing species composition.

Forest Cover, Land Use, Economics and Forest Based Policy

As stated, forest cover is extensive, particularly in the northern territories, Galicia especially where the forest sector is an important employment sector. In Galicia, Asturias, and Castilla and Leon the forest is controlled by the Regional Government through directorates in the respective region. This affords the regions a degree of autonomy – Autonomous Community (AC). All forestry and subsequent wood use is controlled by the Forest Act (50/2014) and the Spanish State Forest Law (43/2003). The Autonomous Communities have their own law ("Ley de Montes") that regulates the protection, management and harvesting of forests in their territory. Article 33 establishes the need for both public and private forests to have the following: a Forest Management Plan, a working scheme or other equivalent Management Instrument. These documents will be elaborated by the owner/title holder and must always be approved by the regional forestry organization. In case of an approved management plan, this sets out the specific regulations to take into account in the forest in question. One third of Spanish forests are under public ownership, however only a very small proportion is owned by the state. Most public land is owned by local public corporations. Forest management is also shared among the

¹² <http://www.biodiversity.no/Pages/135380>

¹³ <http://www.biodiversity.no/Pages/135380>

¹⁴ <http://www.environment.no/topics/biodiversity/species-in-norway/threatened-species/>

¹⁵ <http://www.biodiversity.no/Pages/135380>

different jurisdictional levels; there are State laws which include general regulations but most responsibility for the management of public forests falls at the level of the Autonomous Community. Wood harvesting is regulated by the Autonomous Community's forest agency, these agencies authorize and supervise harvesting in accordance with the applicable legislation. Management and legislation is shared between state and Autonomous Communities; but it depends on the topic. There are specific areas legislated mostly by the state (e.g. land tenure, tax payment, transports) but others for which each AC has developed their own legislation, the content and provisions of which differs from one community to another (as with management and harvesting planning). Regarding the reforestation of private and municipal woodlands by means of a consortium, these are especially important to allow the restoration of private woodlands whose benefits are of public interest¹⁶.

Protected Areas in Spain and IUCN species

Spain as whole has 4052 protected areas representing 28% of land area. Biodiversity and Protected Areas: Spain has some 746 known species of amphibians, birds, mammals and reptiles according to figures from the World Conservation Monitoring Centre. Of these, 4.7% are endemic, meaning they exist in no other country, and 7.0% are threatened. Spain is home to at least 5050 species of vascular plants, of which 18.6% are endemic. 8.0% of Spain is protected under IUCN categories I-V.

2.4 Sweden

Overview

Residues from sawmills are sourced by Blue Point Pellets Denmark ApS and the Supply Base includes all sawmill residues from primary processors and suppliers of chipped primary feedstock that are SBP compliant biomass or SBP controlled biomass from Sweden as the place of harvesting. More than 60% of forests area in Sweden is either FSC or PEFC certified.

The commercial biomass market is not distinguished from domestic fuelwood in the reporting of national statistics in Sweden. Fuelwood represented 6.2 million cubic metres in 2013 and woodchips from sawn timber and processing of pulpwood, 9.2 million cubic metres. This represented a small proportion of the sawn timber industry (>50 million cubic metres) and pulp and paper industry (> 90 million cubic metres).

Similarly to Norway, Sweden has a well-established paper industry with more than 50 large pulp and paper manufacturers, and sawmills make up a notable part the wood industry with more than 140 sawmills and 10,000 cubic metres of sawn timber produced¹⁷. This makes sawmill residues or sawdust a prolific biomass feedstock and makes Sweden the third-largest exporter of wood products in the world by volume. Biomass for non-domestic use is a minor proportion of the national industry.

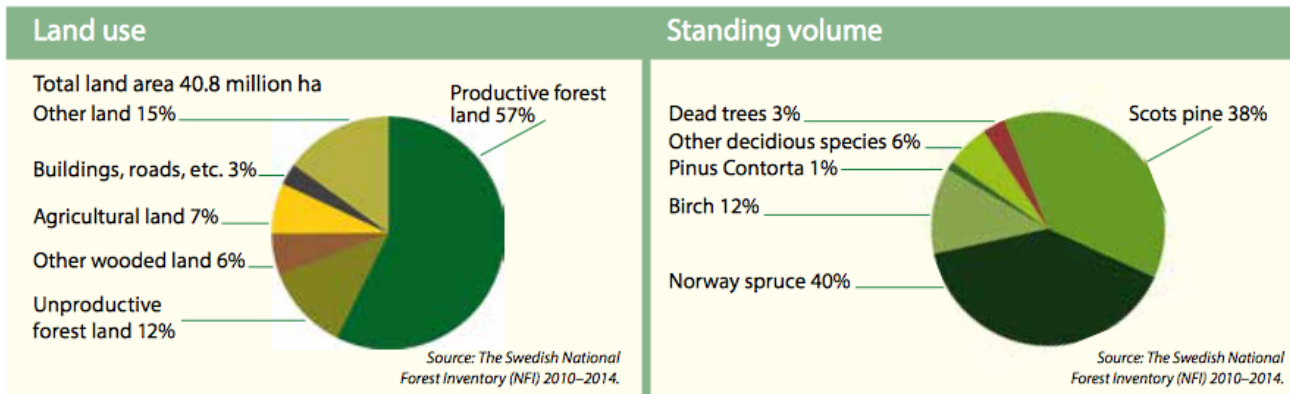
Forest Cover, Land Use, Economics and Forest-Based Policy

Approximately 57% of the surface area in Sweden is covered by productive forest. Unproductive forest land accounts for 12%. Forests represent nearly 70% of the land area of Sweden as represented in Figure 3.

¹⁶ Source NEPCon

¹⁷ http://www.swedishwood.com/about_wood/wood_industry

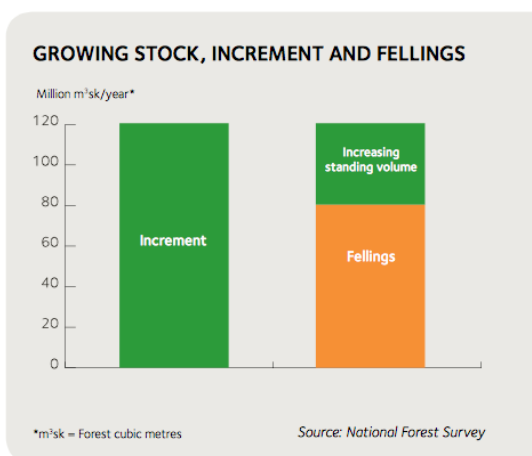
Figure 3: Land Use and Standing Volume



As in Norway, the majority of forests are conifer-dominant and much ownership is by private individuals/families where the forest has been handed down over generations. Approximately 200,000 such individuals owning small areas typically of 5 hectares own 50% of Sweden's forest land. Large forest companies own 25% of the country's forests and the remaining 25% is owned by the state and other public organizations. The state-owned company Sveaskog, accounts for 14 per cent of all forest lands in Sweden, making it the largest state stakeholder.

Latest available figures (2010) state that the growing stock of timber was 3,000 million cubic metres. Spruce/whitewood (*Picea abies*), also called Norwegian spruce accounts for 41%, 40% is pine (*Pinus sylvestris*), 8% is birch (*Fagus sylvatica*) and 6% other deciduous trees¹⁸. The annual increment is around 40 million cubic metres. Figure 4. Represents the difference between annual increment and fellings.

Figure 4. Annual Increment and Fellings.



Forest owners cut approximately 80 million cubic metres industrial roundwood for sale and the trend of increasing standing volumes shows a predicted 100% growth in 100 years since 1930.

¹⁸ http://abtimmer.se/wp-content/uploads/2014/05/swedish_forestry.pdf

The increase is a result of the National Forest Policy and principles including modern sustainable forest management, restoring forest resources and respecting biological diversity. Like Norway, the total annual harvest is less than 50% of this growth. The variety of small-scale forestry operations with long-rotation between harvesting provides conditions for maintaining biodiversity.

In 1993 Sweden changed its forest policy to integrate ecological considerations with modern forestry practices. The policy focuses on two major objectives, one around production and one around environmental concerns. The overarching intention of forest policy is, in line with international agreements, to ensure sustainable forest management. In 2014 the government decided to establish a National Forest Programme in order to meet the increasing demands for public participation in forest policy development, and to increase the efficiency of implementing forest-related policies and international commitments.

More than 70% of the yearly wood volume procured originates from final felling, with the rest coming from thinning operations. Besides wood, forest biomass for energy purposes is produced, mainly originating from tops and branches opposed to stemwood or roundwood as denoted in Figure 5.

Figure 5. Final Felling in Sweden.

Forestry Data	
Final felling at the end of the rotation period (ha/yr)	190,000
Thinning (ha/yr)	380,000
Scarification (ha/yr)	170,000
Regeneration (ha/yr)	185,000
Forest tree seedlings produced (no/yr)	380,000,000
Cleaning (ha/yr)	270,000
Average 2009–2013	
<i>Source: Statistical Yearbook of Forestry 2014. Swedish Forest Agency.</i>	

Protected Areas (see Figure 1 and 2 page 6.)

Of Sweden's 28 million hectares of forest land about two million hectares are protected for conservation purposes, mostly in national parks and nature reserves. In these areas, timber extraction is not allowed unless it is to specifically improve the value of the land for nature and/or for the purposes of cultural conservation. In addition, unproductive forest land which accounts for some four million hectares are protected by the Forestry Act since the 1970s. On the remaining forest land there is active forest management with equal importance attached to biomass production and environmental goals.

CITES¹⁹ species are present in Sweden but do not include threatened softwood or deciduous (broadleaf species) trees. Sweden has a high proportion of IUCN Categories. Protected Areas Categories and locations are indicated in the European Environment Agency Map (Figure 1, page 6).

Lands protected²⁰ under The Environmental Code 1998²¹

Protected habitats account for 7,092 areas (24,187 total hectares and 24,075 land area hectares), which represents 0.1% of protected areas in Sweden, out of a total of 10.9%, which includes Natura 2000 areas.

Sweden has more than 4,500 Natura 2000 areas, covering a total area of 6.7 million hectares. The protection often overlaps a number of protected areas already under Swedish legislation.

Of all the protected areas, more than 60% are habitat protection areas in forest land. Nature reserves follow, at 35%. Nature reserves dominate in terms of area, accounting for 84% of protected areas. National parks comprise 14% of protected areas, even though they are few in number. Habitat protection areas in forest land comprise only 0.5% of protected areas.

IUCN and Red List

Sweden has formally adopted a Red List classification of species in accordance with criteria from the International Union for Conservation of Nature (IUCN)²². A large proportion of the Red List species found in forests are associated with rich broadleaf forest, however this makes up less than a small proportion of Sweden's productive forest land. Biomass feedstock are from conifer-dominated habitats, thus the risk of feedstock affecting Red List species is inherently low and Sweden's adoption of protected areas classifications provides further protection.

The Red List Summary published by Sweden states that biodiversity loss has neither increased nor decreased though logging and overgrowth of habitats such as meadows, pasture forests and wetlands is recognised to be a threat. Land Use Change (LUC) provides the greatest threat.

2.5 Finland

Overview

Residues from sawmills are sourced by Blue Point Pellets Denmark ApS and the Supply Base includes all sawmill residues from primary processors that are SBP compliant biomass or SBP controlled biomass. Approximately 90% of Finnish production forests are certified under the Finnish PEFC system. The Finnish system was endorsed for membership of PEFC in the year 2000. Many forest management companies have FSC and PEFC certification.

¹⁹ <https://cites.org/eng/cms/index.php/component/cp/country/NO>

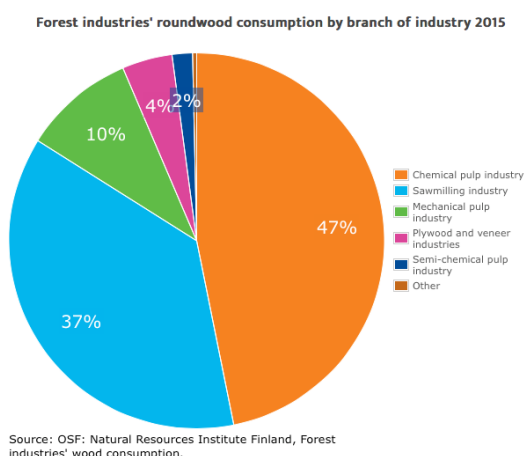
²⁰ http://www.scb.se/en_/Finding-statistics/Statistics-by-subject-area/Environment/Land-use/Protected-nature/Aktuell-Pong/24548/Behallare-for-Press/374336/

²¹ <http://www.government.se/legal-documents/2000/08/ds-200061/>

²² <http://www.artdatabanken.se/en/the-red-list/>

Finland is the most forested country in Europe with more than 23 million hectares. Statistics Finland²³ indicated that in 2015, the forest industries' roundwood consumption totalled 64.7 million cubic metres. The largest sectors of roundwood consumption being chemical and pulp (47%) and the sawmill industry the second-largest consumer (37%). The biomass industry as a recipient of roundwood is negligible as Figure 6.

Figure 6. Forest Industries Roundwood Consumption 2015.



The main use of biomass from Finland is chips as sawmill residues. More than half of the energywood purchased as raw material for forest chips was pruned stemwood and logging residues accounted for one third of all energywood sales. This overwhelmingly indicates that biomass from Finland is wood industry residues, logging residues, forest residues and low-grade energywood and not stemwood. Forest industry companies produce their own energy using bark, sawdust and chips, logging residues from thinning's and regeneration fellings. A target has been set to increase the use of forest chips to 13.5 million cubic metres by the year 2020.

Forest Cover, Land Use, Economics and Forest Based Policy

Many Finns have long relied on forests and associated natural resources available to them for their livelihoods. Forest management in Finland is mainly based on the use of native tree species and forests are generally managed quite intensively with practices based on regular thinning's and clear-fellings. As part of forest management, the majority (some 10 million hectares) of Finland's mires have been drained.

Of the total forestry land in Finland, 84% is available for wood supply, i.e. felling is permitted in these areas. The total growing stock volume in Finland has increased since the 1970s, amounting to 2,206 million cubic metres (over bark). Half of the growing stock volume consists of Scots pine (50%), 30% Norwegian Spruce and 20% broadleaves (mainly Birch). The proportion of Pine has gradually increased and that of spruce has decreased.

²³ <http://stat.luke.fi/en/releasecalendar>

The proportion of growing stock on mires is 23%, and its importance is increasing. Of the growing stock volume, 92% is in forests available for wood supply. The annual increment of the growing stock in Finland is over 100 million cubic metres, of which 97 million cubic metres are in forests available for wood supply. Removal has continuously remained lower than the volume increment of the growing stock. The difference between increment and removals is largest in Pine.

The number of tree species in Finnish forests is small. The majority of forests in Finland are predominantly coniferous, with broadleaves growing in mixed stands. There are only four coniferous species native to Finland, and fewer than 30 deciduous trees and shrubs.

As in other countries in Western Europe, private individuals and families mainly own forests in Finland. The holdings are quite small. The number of farms with more than two hectares of forest is 345,000. The average size of holdings is 30 ha. There are more forest owners than there are holdings, because spouses often have joint ownership of the holding. The number of people owning forest is estimated to be about 735,000. Of the total forestry land in Finland, 52% is under private family ownership; the state owns 35% and forest industry companies own 8%. The remaining 5% represents forests under municipal, parish, shared or joint ownership. State-owned forests are mainly situated in Northern Finland, and the state also owns most of the nature conservation and wilderness areas. Private forest owners have 64% of the total growing stock volume and 70% of the growing stock in forests available for wood supply.

Protected Areas (see Figure 1 and 2 page 6)

Strictly protected areas cover 5.2% of forest land in Finland (2008). In addition, 0.4% of forest land is protected as areas where restricted forest management is possible. Of the total land area (including low-productive and non-productive lands), 13.7% is strictly protected. Most of the forest conservation areas have been established in Northern Finland, where the State owns a lot of forests, whereas there are clearly fewer conservation areas in Southern Finland, where private ownership dominates. The main flaw in the forest conservation area network is the low rate of conservation in the northern boreal, southern boreal and middle boreal forest vegetation zones, where approximately just 2% of forest land is strictly protected. Nature conservation in Finland is based on statutory conservation programmes specific to habitat types.

Natura 2000 includes 1,860 protected sites in Finland, totalling 4.9 million hectares (of which 3.6 mill. ha is land). According to recommendations, old broad-leaved trees are left standing in the forest in fellings, and decaying trees or other trees that have special biological value are also preserved. About one half of the approximately 43,000 species known in Finland live in forests. Research into forest species, and the interaction between forest management and forest species has increased since the 1990s. The occurrence of threatened species is now monitored regularly. According to a recent survey, there are 1,505 threatened species in Finland, of which 37% are forest species that favour especially herb-rich forests or old-growth forests. The majority of threatened forest species are invertebrates and fungi.

An assessment of threatened habitat types in Finland was first published in 2008. It assessed the status of 400 habitat types and human influence on them. Two-thirds of the 76 habitat types in forests were found to be under threat.

National parks and nature reserves are the backbone of the conservation programmes. These have been complemented with special conservation programmes for mires, herb-rich forests, old-growth forests, wetlands, shoreline areas and esker formations. The smallest sites are protected under separate conservation decisions. The preservation of wilderness areas in Lapland is secured by the Wilderness Act²⁴.

IUCN and Red List

Finland has formally adopted a Red List classification of species in accordance with criteria from the International Union for Conservation of Nature (IUCN)²⁵. 592 Protected Areas have an IUCN Category.²⁶

A large proportion of the Red List species are found in old-growth forests. Therefore, the risk of feedstock affecting Red List species is inherently low provided logging does not take place in old-growth forests.

Finland, as part of the EU, is party to several international agreements that deal with the protection of threatened species and cover forestry and land management practices. The most important of these are the Convention on Biological Diversity, the Bern Convention, the CITES Convention and the Ramsar Convention.

Final Fellings

We do not undertake on-the-ground forest sampling and information on final fellings greater than 40 years is listed in section 2.3. This is based on inference in the absence of clear national statistics and not conducting a sampling on-the-ground.

2.6 Belarus

Overview

During the last 60 years the percentage of forest land has almost doubled in Belarus and is increasing at the moment. Total area of the forest fund in Belarus is more than 9.4 million ha, percentage of forest land makes 39%. The stock of growing wood is estimated at 1.6 billion m³. Annual wood increment makes 31.4 million m³. The republic has 0.86 ha of forest covered land and 170 cubic meter of wood stock per inhabitant what is twice more than the average European rate.

Furthermore there is observed the steady enlargement of the areas with the maturing, mature and overmature forest stands. During the twenty-year period the area of mature forest stands increased more than twice.

As a result of the planned regulation of the wood cutting volumes firstly of the final felling the total stock of forest stands has increased by a factor 1.6, the stock of mature stands made 197 million m³. In 1989 the share of mature forests made only 2.3% nowadays it is already 11%.

²⁴ Source includes SA-FM/COC Report

²⁵ <http://www.environment.fi/redlist>

²⁶ <http://www.protectedplanet.net/country/FI>

Forest Cover, Land Use, Economics and Forest Based Policy

The forestry organizations of the Ministry of Forestry are actively engaged in the wood sawing. At present in the branch there function 71 saw-mills. 2012 they processed 1.79 million m³ of wood (122.5% comparing to 2011), produced 539.5 thousand m³ of sawn timber. The share of produced dried materials increased by 51.5%.

The products of the saw-mills are well sold in the home market and abroad. 24 projects to increase effectiveness of the woodworking shops were realized. Since 2007 the organizations of the Ministry of Forestry started producing of the different kinds of wood fuel. Altogether 2007-2011 there were created 41 facilities for production of the wood fuel chips with the total capacity 943 thousand m³ annually. By the end of 2015 70 such facilities will function in the branch. They could produce 1,5 million m³ of the wood fuel chips annually.

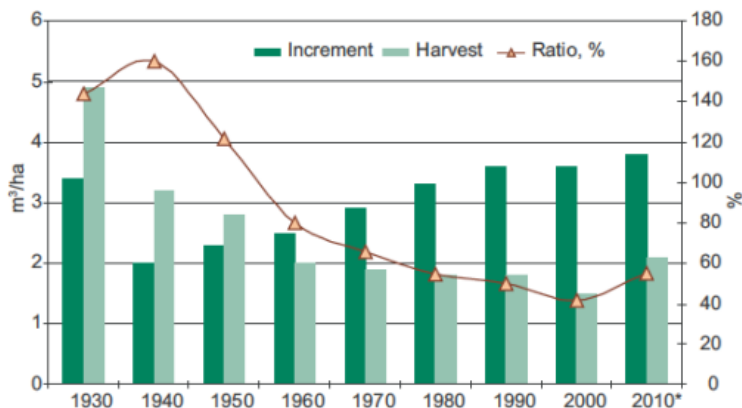
During 2012 forestry enterprises stored up 4,7 million m³ wood fuel (firewood and waste wood). At present the organizations of the Ministry of Forestry take part in realization of 6 innovation projects in the field of power engineering. Forestry institutions supply Pinsk and Pruzhany heat stations, BelGRES, Vileyka, Zhodino and Osipovich mini heat stations with wood fuel. in the forestry enterprises of the branch in 2012.

Production of wood chips has been developed in 27 forestry enterprises with a total capacity of 398 000 m³ per year. In Belarus, there is a new system of renewable energy based on energy wood was created including domestic machinery and equipment and the organization of production. Currently, attention is focused on reducing the production cost of energy wood and increasing its competitiveness relative to fossil fuels by developing the most effective systems of machines and optimizing the location of warehouses and logistic solutions for the fuel delivery.

The main source of energy wood in Belarus is wood from harvestings (85% of the total energy wood); the rest is from wood processing industry by-products. The output of energy wood from final fellings is 27–32%, from thinnings 53–55%, and from other fellings 58–60% (Belstat 2010, Forestry Programme 2006). Of the energy wood potential, 7.8 million m³ per year is stem wood and at least 0.5 million m³ per year is logging residues.

Final Felling in Belarus

The allowable cut for final fellings is about 8.9 million m³ per year this represents approximately 50% of the annual volume to be harvested is set on the basis of proposals by the Ministry of Forestry according to forest management plans. The current justified allowable harvesting volume in Belarus is about 16.3 million m³ per year of which 81–96% is utilized. Annual actual harvesting volume is approximately 14 million m³. The total annual harvest has been quite stable over the last years (Fig. 3.3).



Protected Areas

Terrestrial protected areas (9% of total land area) in Belarus. Total areas protected is 207,228 ha. The most important area is around the Polish / Belarus border forming a corridor around the Bialowieza National Park. This is a crucially important area and primary forest.

There are numerous large mammals on the IUCN Red List in Belarus including the wolf (*Canis lupis*).

General Point – Protected Species; EU States

All EU countries and Norway included in the Supply Base Report has ratified the Convention of Biodiversity 1992 and is party to several international agreements that deal with the protection of threatened species and cover forestry and land management practices. The most important of these are the Convention on Biological Diversity, the Bern Convention, the CITES Convention and the Ramsar Convention

2.7 Denmark

Overview

Primary feedstock sourced from a SBP certified supplier is sourced by Blue Point Pellets Denmark ApS.

Though this information is not specific to the feedstock as it is post-consumer, Grade A, untreated waste wood FSC Recycled 100% from a Danish supplier. Information on Danish forests are included based in the premise that some of the raw material of the recycled material may have arisen in Denmark.

Danish forests comprise state-owned forests, managed by the Nature Agency's local units, as well as many privately owned forests and woodlands²⁷. There are officially 608,078 ha of forest in Denmark, corresponding to 14.1% of the land area. The total area of Denmark is 4,239,400 ha. The total forest land is 534,500 ha with 200,000 ha owned by the state. Forests are unevenly spread, with much forest along the high ridge of Jutland, in northern Zealand and on Bornholm. There is a lot of smaller forestland near large towns and cities.

Norway spruce grow on 19% of the forest land and it is the most common tree species in Denmark and overall,

²⁷ <http://eng.naturstyrelsen.dk/nature-protection/forestry/>

conifers are the most common trees comprising over 50% in some areas.

Conifers have been very successful in Denmark because they are hardy and thrive on heath and dune areas, and because they grow quickly and therefore they have been more profitable for forest owners than deciduous trees. This is one reason why there are most conifers in Jutland. Conifers take up 50% of the total forest land, while deciduous trees account for 46.4%, beech (*Fagus sylvatica*) constituting a large proportion of deciduous in Denmark. (The remaining area is bare or a specific tree species has not been identified on the area.

Most species of deciduous tree, such as oak and beech, are indigenous to Denmark, while conifers have been imported over the past 200-300 years. For example, the most common tree species in Denmark is the Norway spruce, imported from other European countries like Sweden and Germany, while other species such as Sitka spruce and Douglas fir have been imported from North America.

Forest Cover, Land Use, Economics and Forest-Based Policy

Denmark also has a high percentage of forest land (around 65%) that is owned by private persons. The private persons and citizens who own forest land in Denmark are often farmers, who also happen to be forest owners. In instances such as theirs, it is likely that the family has owned the forest land for generations.

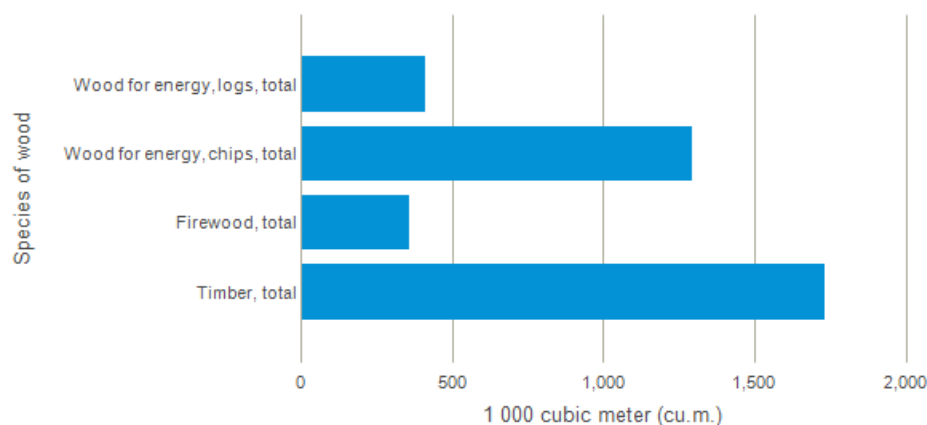
Danish family forestry has been under considerable pressure in recent years, with the economic sustainability of forestry being brought into question and concerns within the biomass industry which has lead to the Danish Industry Energy Agreement – a voluntary agreement for generation stations to adhere to that are > 20MWe.

Commercial harvesting (not final fellings) and wood biomass use indicates a significant proportion and there is not a sawmill or pulp-based forestry sector in Denmark, see Figure 6 below. However, Denmark uses far more wood than it produces. Each year around 4.3 million m³ are felled, but despite this the amount of timber in Danish forests is growing by an annual net 2.4 million m³.

Figure 8. Final Felling in Denmark

Felling in forest and plantation in Denmark

Region: All Denmark | Time: 2014



Wood for energy chips total for all of Denmark according to national statistics was 1,295,000 m³ in 2014 and 412,000 m³ for logs for energy use out of a total 1,732,000 m³ harvested in 2014²⁸.

Denmark uses far more wood than it produces. Each year around 4.3 million m³ are felled, but despite this the amount of timber in Danish forests is growing by an annual net 2.4 million m³.

Protected Areas (see Figure 1. page 6).

Denmark has a national plan for species management, nature protection and enhancement of biodiversity.

International nature protection in Denmark includes 252 Natura 2000 areas, 261 Sites of Community Importance and 113 Special Protection Areas covering 8,3 %. Also, 27 wetland areas have been designated as Ramsar sites. Overall this represents 18% of land area that is protected in Denmark²⁹. 1,714 have an IUCN Category. A total of 252 Natura 2000 sites have been designated in Denmark.

Final Fellings

We do not undertake on-the-ground forest sampling and information on final fellings greater than 40 years is listed in section 2.3. This is based on inference in the absence of clear national statistics and not conducting a sampling on-the-ground.

2.8 Germany

Overview

An important nature diversity factor is the country location, which is a moderate climate zone of mixed forests. The country is located between the boreal forest zone and the temperate broadleaf forest zone, which is characterised by a rich biological diversity, in which the traits of both boreal forest and broadleaf forest nature zones can be observed.

The dominant tree species in Germany are Pine (Scots pine), beech and spruce (Norway spruce) and oak. Common aspen and Black alder also cover significant areas of the country.

Forest Cover, Land Use, Economics and Forest Based Policy

There are thousand private forest owners (physical persons) who own 56% of the forest area. The rest is owned by the state (44%).

The forest industry accounts for around 10% of the Germany industry added value. The industry employs approximately 3% of the total labour force in the country. Around 70-80% of the products are exported, thus influencing the German foreign trade balance in a positive way.

In Germany all forests are managed sustainably. The German forest policy identifies one general goal: the

²⁸ <http://www.statbank.dk/10477>

²⁹ <http://www.protectedplanet.net>

sustainable management of forests. The main criteria are as follows: prevention of reduction of forest area, protection and improvement of the productivity and value of forest; afforestation of non-agricultural and other lands. Besides, forests of Germany comply with the sustainable forest management criteria set out in Sustainable Forest Management 2010 guidelines. In Germany all nearly all state owned forests are certified. In private forests the certification process still continues. All forests where forestry activities take place have a long-term forest inventory for short-term planning of economic activity. Laws and regulations strictly set out forest management requirements. The supervision is carried out by State Forest service. Protected territories have secure boundaries and management requirements laid down by laws and regulations³⁰

Protected Areas

57% of German forests have a protected status. 17% of the forests are Natura 2000 designated sites:



Altogether in Germany there are 2,067 specially protected nature areas³¹ certified by law or regulations of the Cabinet of Ministers On Specially Protected Nature Territories. There is information given below about all specially protected nature areas that are found in the particular administrative territory:

0.9% of the country has Strict Nature Reserves: strict nature reserves are territories untouched by human activities or nearly natural, in which territories unhindered development of natural processes shall be ensured in order to protect and study rare or typical ecosystems and parts thereof. Strict nature reserves shall have zones in which all natural resources are completely excluded from economic and other activities. Biosphere reserve are broad territory in which landscapes and ecosystems of international significance are located. The goal of establishing biosphere reserves is to ensure the preservation of natural diversity and to promote sustainable social and economic development of the territory. Protected Landscape Areas are territories remarkable for original and diverse landscapes and special beauty. The goals of such territories are to protect and preserve the cultural environment and landscapes characteristic of Germany in all their diversity, as well as to ensure the preservation of environment appropriate for recreation of society and for tourism, and use of environment friendly management methods. National parks are broad areas which are characterised by outstanding nature formations of national significance, landscapes and cultural heritage landscapes untouched by human activities or nearly natural, a diversity of biotopes, abundance of cultural and historical monuments, and peculiarities of cultural environment.

³⁰ <http://www.fao.org/docrep/013/al548E/al548e.pdf>

³¹ <https://www.bfn.de/en/activities/protected-areas.html>

IUCN species

9 Protected Areas have an IUCN Category. IUCN has defined a series of six protected area management categories, based on primary management objectives. Species that are considered threatened at the European level and occur in Germany are found mostly in wetlands, forests and grasslands. Habitat loss, fragmentation and degradation are the most significant threats at the European level to species that occur in Germany. For freshwater species, major threats include water pollution caused by agricultural and forestry effluents, natural systems modifications and agricultural expansion and intensification. Other major threats come from logging and wood harvesting and urban and touristic development.

All EU States

All EU countries and Norway included in the Supply Base Report has ratified the Convention of Biodiversity 1992 and is party to several international agreements that deal with the protection of threatened species and cover forestry and land management practices. The most important of these are the Convention on Biological Diversity, the Bern Convention, the CITES Convention and the Ramsar Convention.

All EU states have committed to halting biodiversity loss by 2020 but urgent action is needed to meet this target and better monitoring capacity is required to measure if the target is met.

Final Fellings

We do not undertake on-the-ground forest sampling and information on final fellings greater than 40 years is listed in section 2.3. This is based on inference in the absence of clear national statistics and not conducting a sampling on-the-ground.

2.9 Poland

Overview

Forests cover 8.6 million ha, almost 28% of Poland, and are dominated by coniferous stands of mainly Scots pine (*Pinus sylvestris*). The contribution of forestry to the Gross Domestic Product (GDP) is rather low (0.4%), but this does not include the value of the environmental and socio-economic contributions of forests. In 1993, the per capita forest area in Poland was 0.226 ha. The average standing timber volume is 172 cbm/ha. Presently, only about 61% of the forest increment is harvested.

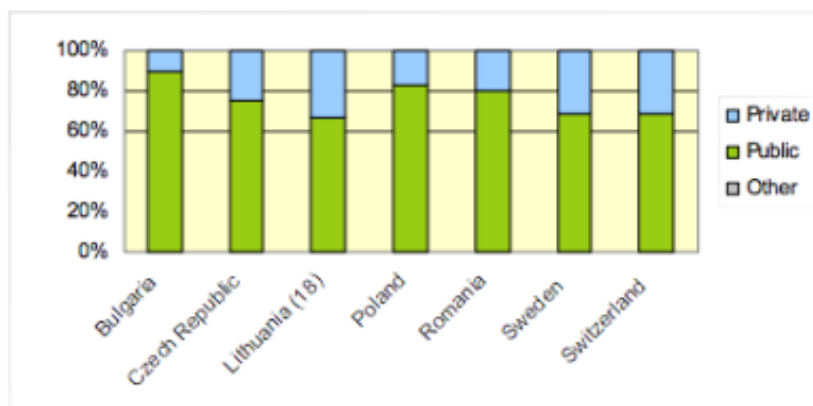
Forest Cover, Land Use, Economics and Forest Based Policy

Public forests, comprising over 80% of the total, dominate the Polish landscape, which is relatively unusual in this part of Europe. With the change of the political system in 1989 came attempts to privatize public forests, but such initiatives were not accepted by society. Private forests, at slightly above 18% of the total, are highly fragmented – the average private forest area is just over one hectare – and not a significant factor in the Polish forest sector. Hence, not much research is available on private forests. Changes in forest ownership in Poland were mainly due to afforestation, which increased the area of private forests. But no studies have been conducted on new or nontraditional forest owners.

Ownership of Forests in Poland: Figure

The State Forests, which manage over 77% of forests in Poland.

Figure 2.1.5. Countries with predominance of public ownership of forest and other wooded land¹⁸ (percentage)



Since 1990 the amount of timber supplied to the market has more than doubled, to 36 million m³, with no detriment to the forests partly attributable to relatively strong legislation though this has been under criticism with plans to allow logging in primeval forest in Poland. With regards to forest legislation, The Forestry Act passed by the Parliament in 1991 provided recognition that the environmental and social role of forests is equally important as that of a provider of raw material for the industry. 1997 amendments to the Act further supported and elaborated on the Act's intent to protect the environment. The intent was expressed, among other things, in a description of the scope of forest management as being not only the forest stand but also the entire forest ecosystem. In addition, a section on environmental protection was added to the forest management plan.

Poland is not threatened by deforestation in the same way as in many other countries. Forests currently account for 29% of the total area (approx. 9 m hectares). An increase in the forested areas of the country has been planned. Afforestation works in Poland are the responsibility of the National Afforestation Programme, whose main aim, in conformity with the aims of the National Policy on Forests, is to increase the forested areas of Poland to 30 % by 2020 and 33 % by 2050³².

Protected Areas

In 1993, protected forests constituted 47% of the total state forest area. There were 20 national parks, 100 natural reserves, 100 landscape parks and 263 protected landscape areas forming an impressive network of protected forest areas.

³² <http://iucn.org/about/union/secretariat/offices/europe/?12794>

2.10 Actions taken to promote certification amongst feedstock supplier

All suppliers are now PEFC or FSC certified and managed in accordance with Blue Point Pellets Denmark ApS FSC and PEFC chain of custody certification.

2.11 Final harvest sampling programme

A sampling programme on-the-ground is not conducted. We have applied a methodology based on EU statistics, the following proportions apply to feedstock received by BPP.

Country	Rotation > 40 years	National Statistic Reference	Total 1,000 m3	Fuel wood m3	Expressed as a % of the overall wood harvest	*Proportion of wood into the biomass into plants m3
NORWAY	YES	Assuming 50% as a conservative estimate https://ec.europa.eu/eurostat/tgm/table.do?tab=table&init=1&language=en&pcode=tag00072&plugin=1	11,876	1,718	14.47%	859
SWEDEN	YES		74,300	7,000	9.42%	3,500
BELARUS	YES		7,000	2,300	32.86%	1,150
SPAIN	YES	https://www.researchgate.net/publication/249650495_Energy_sector_in_Belarus_Focus_on_wood_and_peat_fuels	17,847	2,897	16.23%	1,449
GERMANY	YES		55,613	10,494	18.87%	5,247
DENMARK	YES		3,180	1,950	61.32%	975
FINLAND	YES	https://www.researchgate.net/publication/249650495_Energy_sector_in_Belarus_Focus_on_wood_and_peat_fuels	59,411	7,964	13.40%	3,982
POLAND	YES		45,348	8,673	19.13%	4,337

2.12 Flow diagram of feedstock inputs showing feedstock type [optional]

Not required as at present there are limited suppliers and complexity of feedstock.

2.13 Quantification of the Supply Base

Supply Base

- Total Supply Base area (ha): Predominately conifer 74 million ha of productive forest respectively (Norway 7.2m ha, Sweden 23.3m ha, Finland 20.3m ha, Denmark 0.48m ha, Belarus 8.01 m ha³³, Germany 2.9m ha plus including Poland 8.6 m ha , Spain; Galicia, Asturias and Leon (2.4 million within the three regions)
- Tenure by type (ha):
Private ownership
 Norway 80% - 5.76 m ha
 Finland 52% - 10.56 m ha
 Sweden 30% - 6.00 m ha
 Belarus 0%
 Denmark 65% - 0.31 m ha
 Germany 56% - 6.39 m ha

Poland (based on a proportion of raw material used in production of secondary feedstock from Germany):

19% - 1.62 m ha

Spain: 100% 2.4 m ha

Public ownership

Norway 20% - 1.44 m ha

Sweden 70% - 17.3 m ha

Finland 48% - 9.74 m ha

Spain: 0% m ha

Germany 44% - 5.02 m ha

Denmark 35% - 0.17 m ha

Belarus 100% - 8.01m ha

Poland (based on a proportion of raw material used in production of secondary feedstock from Germany):

81% - 6.97 m ha

- c. Forest by type (ha): Temperate boreal and coniferous dominant.
- d. Forest by management type (ha): Plantation 2 million ha. Managed natural (100%) 65 m ha
- e. Certified forest by scheme (ha) as below:

FSC <https://ic.fsc.org/en/facts-figures>

Norway: 52 Chain of Custody certificates. 417,900 (ha) certified

Sweden: 331 Chain of Custody certificates. 12,216,619 (ha) certified

Finland: 109 Chain of Custody certificates. 1,233,604 (ha) certified

Denmark: 258 Chain of Custody certificates. 212,161 (ha) certified

Germany: 2,211 Chain of Custody certificates, 1,156,117 (ha) certified

Belarus: 163 Chain of Custody certificates, 9,505,750 (ha) certified

Poland: 1369 Chain of Custody certificates. 6,939,090 (ha) certified

Spain; Galicia, Asturias and Leon: 946 Chain of Custody certificates (all Spain), 30, 400 (ha) certified.

PEFC <https://www.scribd.com/doc/147379606/PEFC-Global-Certificates>

Norway: 64 Chain of Custody certificates. 9,142,702 (ha) certified

Sweden: 212 Chain of Custody certificates. 11,354,853 (ha) certified

Finland: 214 Chain of Custody certificates. 17,582,892 (ha) certified

Spain; Galicia, Asturias and Leon: 879 PEFC Chain of Custody certificates, 174,400 (ha) certified

Denmark: 87 Chain of Custody certificates. 257,391 (ha) certified

Germany: 1,720 Chain of Custody certificates, 7,424,185 (ha) certified

Poland: 164 Chain of Custody certificates. 7,277,704 (ha) certified

Belarus: 105 Chain of Custody certificates, 8,552,000 (ha) certified.

Feedstock

- f. Total volume of Feedstock: Band 1
- g. 31% if Band 1
- h. Volume of primary feedstock: 31% Band 1
- i. List percentage of primary feedstock (g)
 - 100% Certified to an SBP-approved Forest Management Scheme
- j. List all species in primary feedstock, including scientific name:
- k. Volume of primary feedstock from primary forest: 0%

- l.** List percentage of primary feedstock from primary forest (j): 0%
- m.** Volume of secondary feedstock: 68%
- n.** Volume of tertiary feedstock: 1%, post-consumer Grade A, untreated tertiary feedstock from Denmark.

3 Requirement for a Supply Base Evaluation

SBE completed	SBE not completed
☐	☒

All certified inputs and SBE not required.

4 Supply Base Evaluation

Not applicable as feedstock are from SBP Approved Chain of Custody Scheme and certified suppliers.

4.1 Scope

SBE not required as all certified inputs from an SBP approved Forestry Management Scheme

4.2 Justification

Not applicable

4.3 Results of Risk Assessment

Not applicable

4.4 Results of Supplier Verification Programme

Not applicable

4.5 Conclusion

All inputs are certified from an SBP approved Forestry Management Scheme

5 Supply Base Evaluation Process

All inputs are certified from an SBP approved Forestry Management Scheme.

6 Stakeholder Consultation

Not conducted. All inputs are certified from an SBP approved Forestry Management Scheme

6.1 Response to stakeholder comments

Not required. All inputs are certified from an SBP approved Forestry Management Scheme

7 Overview of Initial Assessment of Risk

Not required.

8 Supplier Verification Programme

8.1 Description of the Supplier Verification Programme

All inputs are certified from an SBP approved Forestry Management Scheme

8.2 Site visits

All inputs are certified from an SBP approved Forestry Management Scheme

8.3 Conclusions from the Supplier Verification Programme

All inputs are certified from an SBP approved Forestry Management Scheme

9 Mitigation Measures

9.1 Mitigation measures

All inputs are certified from an SBP approved Forestry Management Scheme

9.2 Monitoring and outcomes

All inputs are certified from an SBP approved Forestry Management Scheme

10 Detailed Findings for Indicators

Not applicable.

11 Review of Report

11.1 Peer review

Reviewed 19.09.2016 by Maciek Stefanski LLB European Legal Studies and independent industry professional (Guildford, United Kingdom). Former Head of Downstream for clean energy at Gazprom Marketing and Trading. Business development and acquisitions manager roles including supplier and fibre assessments in addition to fuel procurement for a major utility.

Maciek Stefanski accepts no responsibility or liability for the accuracy of the information included in the report.

11.2 Public or additional reviews

None.

12 Approval of Report

Approval of Supply Base Report by senior management			
Report Prepared by:	<i>Robin Askey</i>	<i>Contractor</i>	<i>05.09.19</i>
	Name	Title	Date
The undersigned persons confirm that I/we are members of the organisation's senior management and do hereby affirm that the contents of this evaluation report were duly acknowledged by senior management as being accurate prior to approval and finalisation of the report.			
Report approved by:	<i>Sherry Allen</i>	<i>Manager</i>	<i>05.09.19</i>
	Name	Title	Date
Report approved by:	<i>[name]</i>	<i>[title]</i>	<i>[date]</i>
	Name	Title	Date
Report approved by:	<i>[name]</i>	<i>[title]</i>	<i>[date]</i>
	Name	Title	Date

13 Updates

13.1 Significant changes in the Supply Base

Addition of limited supply of secondary material from Belarus..

13.2 Effectiveness of previous mitigation measures

No mitigation measures applied as SBE exempt.

13.3 New risk ratings and mitigation measures

Not applicable.

13.4 Actual figures for feedstock over the previous 12 months

Band 1.

13.5 Projected figures for feedstock over the next 12 months

Band 1 is chosen as disclosure of the exact figure would reveal commercially sensitive information that could be used by competitors to gain competitive advantage