



Supply Base Report:

FramTre SA Scope Change 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:	FramTre SA
Producer address:	Storgata 171, NO-3912 Porsgrunn, Norway
SBP Certificate Code:	SBP-05-30
Geographic position:	59.144780, 9.657020
Primary contact:	Ann Kristin Lunde, +47 415 769 60, ann.kristin.lunde@framtre.no
Company website:	framtre.no
Date report finalised:	30 Sep 2025
SBR reporting period from:	01 Jan 2024
SBR reporting period to:	31 Dec 2024
Name of the Certification Body:	DNV Business Assurance Finland Oy Ab
Certification Body Approval date:	06 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 v2.0
Feedstock origin (countries)	Norway (Telemark, Agder, Vestland og Rogaland)
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

AT Skog SA is purchasing PEFC certified feedstock and from suppliers with valid PEFC certification: 100% PEFC certified (or PEFC controlled sources). 97 % of all feedstock is purchased as 100% PEFC certified.

AT Skog SA is a biomass trader and supplier based in Porsgrunn, Norway, primarily engaged in the sourcing, processing and sale of roundwood and sawmill residues for bioenergy and other wood-based industries. Operations are managed in compliance with SBP requirements and relevant national legislation. The company applies sustainability and legality checks throughout the supply chain to ensure compliance with EU RED and SBP standards

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

Number of employees: 260

Annual maximum production capacity (metric tonnes): 80000

Number of direct feedstock suppliers: 2904

Approximate number of feedstock sub-suppliers: 1159

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

AT Skog maintains an Chain-of-Custody system based on SBP standards. Feedstock is sourced from forests in Norway and neighboring regions, as well as from sawmills and other processing industries supplying residues. All incoming material is checked upon receipt, classified according to feedstock category (forest product and processing residue, recorded in the internal system. The upstream supply chain is verified through supplier declarations, contracts, and audits, ensuring that all material meets the sustainability and legality requirements defined in SBP and EU RED

2.2 Detailed description of the Supply Base

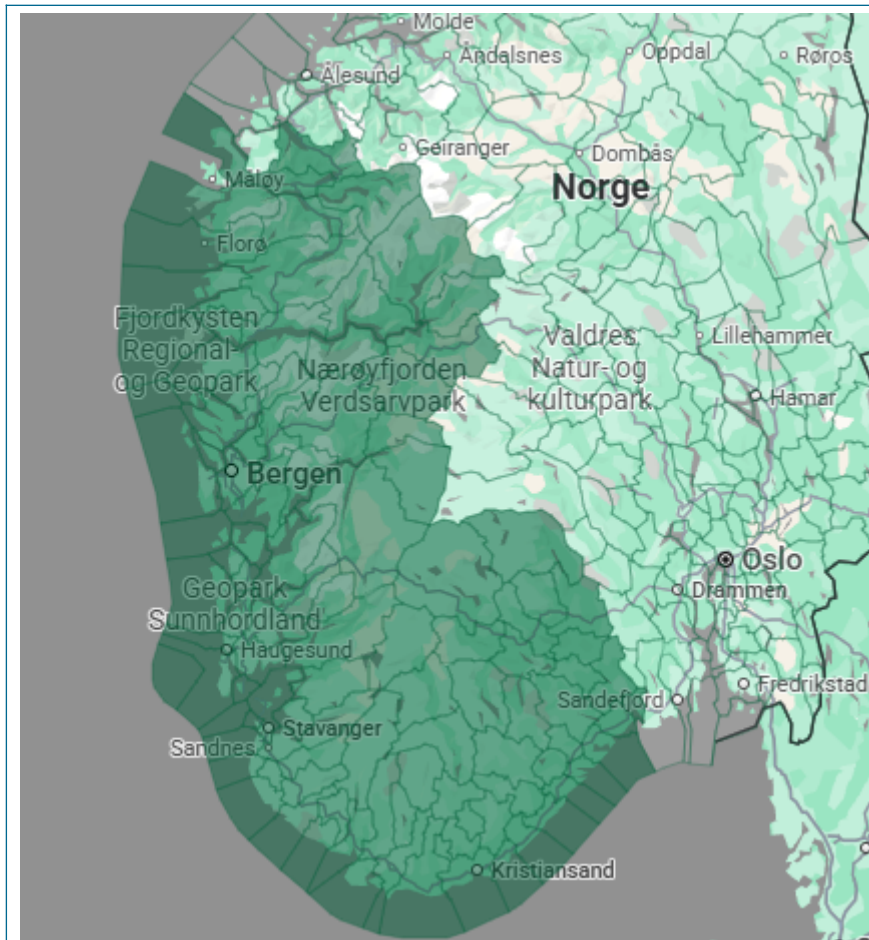
Guidance: Tables below have been generated automatically for each sourcing country based on the selection of 'Feedstock origin (countries)' in section 1 above.

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	Telemark, Agder, Vestland og Rogaland
Exclusions	No
Feedstock types	Primary feedstock, Processing residues
Feedstock Product Groups	Forest feedstock (1A), 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)	Yes – Regional Risk Assessment (RRA) used
Provide a concise summary of why a SBE was determined to be required or not required here:	
The supply base in Norway consists primarily of roundwood from managed forests, sawmill residues (chips, sawdust, bark) sourced from approved suppliers. Norwegian forestry is highly regulated under the Forestry Act and the Regulation on Sustainable Forestry, which require reforestation, sustainable harvesting practices and protection of biodiversity. Additional safeguards are provided through national implementation of EU Timber Regulation and certification schemes (FSC/PEFC) which are widespread among forest owners and sawmills. Monitoring and enforcement is carried out by the Norwegian Agriculture Agency and local forest authorities. Given the strong national regulatory framework, effective enforcement, and widespread use of third-party certification, Natinal RRA identify low risk, eksept indicator 2.1.1, and 3.2.3 for PEFC certified feedstock that need spesific action to bring to low risk.	
Feedstock types included in SBE:	Primary feedstock
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):	1.4700
Map(s) of the Supply Base area:	



2.3 Feedstock information

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

Picea abies	Spruce
Picea sitchensis	Sitka spruce
Abies spp	Fir
Pinus sylvestris	Scots pine
Alnus spp	Alder
Populus spp	Poplar
Fagus sylvatica	Beech
Ulmus glabra	Elm
Quercus spp	Oak
Fraxinus excelsior	Ash
Betula spp	Birch
Tilia cordata	Small-leaved Lime

- 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: No, the feedstock used in the biomass was not removed as part of pest or disease control measures or salvage operations. The majority of the feedstock originates from regular commercial harvesting operations and processing residues from sawmills. Occasional volumes from sanitary fellings (storm-damaged or bark beetle-affected stands) may occur, but these represent a minor share and are harvested under the same legal framework and sustainability requirements as ordinary fellings.

- e. **Hardwood (i.e. broadleaf trees): specify proportion of feedstock from (%):** 9.00
- f. **Softwood (i.e. coniferous trees): specify proportion of feedstock from (%):** 91.00
- g. **Proportion of feedstock composed of or derived from saw logs by weight (%):** 7.00
- h. **Indicate how you determine the proportion of saw log:** Specification issued by a body exercising functions of a public nature and issued for use by sawmills in the area in which the wood was grown.
- i. **Roundwood from fellings from forests with > 40 yr rotation times - Average % volume of fellings delivered to BP (%):** 90.00
- j. **Select forest type(s) where the primary feedstock was sourced from:** Planted Forest; Other Naturally Regenerated Forest
- k. **Select the main harvesting system(s) used for the sourced primary feedstock:** Clearcutting; Thinning
- 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
- n. **Share of SBP-recognised system claim for processing residues:**

100.00 % PEFC

o. Volume of post-consumer feedstock: 0

Physical form of the feedstock: Chips

p. Estimated amount of EU RED-compliant sustainable feedstock that could be collected annually by the BP:
100000 tonnes

q. What is the estimated amount of EU RED-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated): 700000.00 tonnes

Explanation:

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

The supply base has been evaluated. Norwegian forests are managed under strict legislation and verified through FSC/PEFC certification, ensuring compliance with legal, environmental, and sustainability requirements. Supply Base have been evaluated in the interim RRA for Norway: SBP-RRA-EU-NO-FOR v1.0. Specified risk (indicator 2.1.1 and 3.2.3) is evaluated in internal procedures, actions is established to bring indicators to low risk.

3.2 Conflicts with applicable national and sub-national legislation

No conflicts with applicable national or sub-national legislation have been identified within the supply base. All harvesting complies with Norwegian law and is verified through FSC/PEFC certification.

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: Norway	
Area/sub-scope: 100% PEFC certified forests	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☒ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	

2.1.1 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 High Conservation Value (HCV) areas and key habitats are not fully identified or protected in Norwegian forests. Intact Forest Landscapes in Trysil and Pasvik are not legally protected, and there is a risk of harvesting in areas with high biodiversity values, including sites with red-listed species, old-growth forest, or nationally important nature types.
Mitigation measure:
Feedstock is only sourced from suppliers holding valid FSC and PEFC certification, which include requirements to identify and protect key habitats and HCV areas. In addition, the feedstock sourced is of low value, making long-distance transport from remote areas such as Trysil and Pasvikdalen economically unrealistic.
Monitoring and outcomes:
AT Skog ensures that all suppliers maintain valid FSC and PEFC certification, which is regularly checked during the reporting period. Supplier certificates are checked to confirm validity, and deliveries are verified against invoices. Certification systems include requirements to identify and protect key habitats, red-listed species, and areas of High Conservation Value, with compliance verified through external third-party audits of the suppliers. In addition, during the reporting period no deliveries came from Innlandet or Finnmark county.

Country: Norway
Area/sub-scope: 100% PEFC certified forests
Risk Assessment used:
☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☒ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:
3.2.3 feedstock shall not be sourced from forest areas in the Supply Base which, according to local definitions or norms, are classified as having combined attributes of high carbon stocks and high conservation value (HCV).

Description of the specific risk:
There is a specified risk that primary feedstock could originate from areas with both high carbon stock and high conservation value (HCV), including old forest, wetlands, or peatlands.
Mitigation measure:
Feedstock is sourced only from suppliers with valid FSC and PEFC certification. Both standards include requirements to identify and protect key biotopes, wetlands, peatlands, and other areas with High Conservation Value or high carbon stock.
Monitoring and outcomes:
AT Skog ensures that all suppliers maintain valid FSC and PEFC certification, which is regularly checked during the reporting period. Supplier certificates are checked to confirm validity, and deliveries are verified against invoices. Certification systems include requirements to protect key biotopes, wetlands, peatlands, and other areas of High Conservation Value or high carbon stock, and compliance is verified through external third-party audits of the suppliers.

4 Stakeholder engagement

4.1 General description

Biomass Producer's stakeholder engagement start date: 15 Jul 2025

Biomass Producer's stakeholder engagement end date: 15 Aug 2025

Total number of stakeholders contacted: 20

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

The Biomass Producer initiated its stakeholder engagement process on . The process included contacting relevant stakeholders such as forest owners, suppliers, environmental NGOs, local communities, and competent authorities. The purpose of the engagement was to gather input on potential sustainability risks within the supply base, inform stakeholders about the company's biomass sourcing practices, and ensure transparency in line with SBP requirements.

4.2 Response to stakeholder comments

Stakeholder description: Norges Skogeier Forbund

Stakeholder comment: n/a

Response to the stakeholder: n/a

Stakeholder description: Treindustrien

Stakeholder comment: n/a

Response to the stakeholder: n/a

Stakeholder description: Norsk Industri

Stakeholder comment: n/a

Response to the stakeholder: n/a

Stakeholder description: NRL-NBR

Stakeholder comment: n/a

Response to the stakeholder: n/a

Stakeholder description: MEF

Stakeholder comment: n/a

Response to the stakeholder: n/a

Stakeholder description: Fellesforbundet

Stakeholder comment: n/a

Response to the stakeholder: n/a

Stakeholder description: Friluftsrådet

Stakeholder comment: n/a

Response to the stakeholder: n/a

Stakeholder description: DNT

Stakeholder comment: n/a

Response to the stakeholder: n/a

Stakeholder description: Skogselskapet

Stakeholder comment: n/a

Response to the stakeholder: n/a

Stakeholder description: Skiforeningen

Stakeholder comment: n/a

Response to the stakeholder: n/a

Stakeholder description: NJFF

Stakeholder comment: n/a

Response to the stakeholder: n/a

Stakeholder description: WWF

Stakeholder comment: n/a

Response to the stakeholder: n/a

Stakeholder description: Naturvernforbundet

Stakeholder comment: n/a

Response to the stakeholder: n/a

Stakeholder description: Sabima

Stakeholder comment: n/a

Response to the stakeholder: n/a

Stakeholder description: Svanemarket

Stakeholder comment: n/a

Response to the stakeholder: n/a

Stakeholder description: Zero

Stakeholder comment: n/a

Response to the stakeholder: n/a

Stakeholder description: Nibio

Stakeholder comment: n/a

Response to the stakeholder: n/a

Stakeholder description: Nina

Stakeholder comment: n/a

Response to the stakeholder: n/a

Stakeholder description: NMBU

Stakeholder comment: n/a

Response to the stakeholder: n/a

Stakeholder description: PEFC

Stakeholder comment: n/a

Response to the stakeholder: n/a

5 Report updates and approval

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

Updated from version 1,0 to 2,0

Name	John Elter
Title	Other
Date of report approval	30 Sep 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	Norway
Area	Telemark, Agder, Vestland og Rogaland
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	N/A
Level B management system at the level of the forest sourcing area	All harvesting is regulated under the Forestry Act, Nature Diversity Act, and EU Timber Regulation (EUTR). Norway has a transparent forest owner registry and mandatory reporting. Legal ownership is checked out before contract with forest owner is established. All feedstock is 100% PEFC certified and FSC CW controlled. Risk conclusion: Low risk
(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	Harvested areas are regenerated through natural regeneration or planting, in compliance with Norwegian law (<i>Skogbruksloven</i>) and verified via FSC/PEFC certification. Regeneration department in AT Skog takes care to follow up forest owner that harvested areas is regenerated. All feedstock is 100% PEFC certified and FSC CW controlled. Risk conclusion: Low risk
(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	N/A
Level B management system at the level of the forest sourcing area	No harvesting takes place in areas designated for nature protection under national or international law, in compliance with Norwegian legislation and verified through FSC/PEFC certification. All feedstock is

	from forest only, 100% PEFC certified and FSC CW controlled. Risk conclusion: Low risk
(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	Harvesting is conducted in line with sustainable forest management principles, protecting soil quality and biodiversity, and verified through Norwegian law and FSC/PEFC certification. Pre and post inspection of contracts and harvested areas is taken place to make sure that soil quality and biodiversity is in accordance with sustainable forest management principles. All feedstock is from forest only, 100% PEFC certified and FSC CW controlled. Risk conclusion: Low risk
(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	Harvesting is conducted to maintain or enhance the long-term productive capacity of the forest, in compliance with Norwegian law and FSC/PEFC certification. Forest management plan and precautionary check is checked before harvesting contract is established. All feedstock is from forest only, 100% PEFC certified and FSC CW controlled. Risk conclusion: Low risk
(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. <i>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:</i> (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	Forest biomass is not sourced from lands covered by Article 29(3) (except point c), Article 29(4) (except points b and c), or Article 29(5). Compliance is ensured under Norwegian law and verified through FSC/PEFC certification. (the forest biomass is not sourced from: protected areas or forests with high biodiversity, forests with high carbon stocks) All known values are checked (Allma) before harvesting. **Risk conclusion:** Low risk
(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. <i>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:</i> <i>(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.</i>	
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	Forest biomass is not sourced from primary forests, highly biodiverse forests, protected areas, wetlands, peatlands, or land converted after the cut-off date. Compliance is ensured under Norwegian law and verified through FSC/PEFC certification. All feedstock is from forest only, 100% PEFC certified and FSC CW controlled. All known values are checked (Allma) before harvesting. **Risk conclusion:** Low risk
(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. <i>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:</i> <i>(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.</i>	
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	Forest biomass is not sourced from grassland, or land converted after the cut-off date. Compliance is ensured under Norwegian law and verified through FSC/PEFC certification. All known values are checked (Allma) before harvesting. All feedstock is from forest only, 100% PEFC certified and FSC CW controlled. **Risk conclusion:** Low risk
(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. <i>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:</i> <i>(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).</i>	
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	Heathland are not sourced fr Forest biomass is not sourced from heathlands ore land converted after the cut-off date. Compliance is ensured under Norwegian law and verified through FSC/PEFC certification. All known values are checked (Allma) before harvesting. All feedstock is from forest only, 100% PEFC certified and FSC CW controlled. **Risk conclusion:** Low risk
(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. <i>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:</i> <i>(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).</i>	
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	Forest biomass is not sourced from wetlands, or land converted after the cut-off date. Compliance is ensured under Norwegian law and verified through FSC/PEFC certification. All known values are checked (Allma) before harvesting. All feedstock is from forest only, 100% PEFC certified and FSC CW controlled. **Risk conclusion:** Low risk
(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. <i>Article 29 (5): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land</i>	

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	N/A
Level B management system at the level of the forest sourcing area	Forest biomass is not sourced from peatland, nor from land converted after the cut-off date. Compliance is ensured under Norwegian law and verified through FSC/PEFC certification. All known values are checked (Allma) before harvesting. All feedstock is from forest only, 100% PEFC certified and FSC CW controlled. **Risk conclusion:** Low risk
(vii) that installations producing biomass fuels from forest biomass, issue a statement of assurance, underpinned by company-level internal processes, for the purpose of the audits conducted pursuant to Article 30(3), that the forest biomass is not sourced from the lands referred to in point (vi).	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	<i>Not applicable, requirement only applies to Level A</i>

LULUCF criteria 29(7)

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

Annex 2a: EU RED II Supply Base Evaluation

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

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

Verification and monitoring of suppliers

All suppliers are verified and monitored to ensure that no processing residues are used, in compliance with company procedures and FSC/PEFC certification. AT Skog have contract with sawmill. Truckdriver use internal app to register volum and weight.

Feedstock inspection and classification upon receipt

All received feedstock is inspected and classified to confirm that no processing residues are present. Visual quality inspection is performed during loading on truck.

Supplier audit for processing residues and post-consumer feedstock

Supplier audits are conducted minimum once a year to ensure that only processing residues are supplied.

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).