Compliance with the SBP Framework: Public Summary Report

Preferred by Nature OÜ
Evaluation of Bøn Biobrensel AS

Main (Initial) Audit

Sustainable Biomass Program
sbp-cert.org

Completed in accordance with the CB Public Summary Report Template Version 2.1 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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Table of contents

1 Overview **3**

2 Audit conclusions **4**

2.1 Certification decision 4
2.2 Open non-conformities and observations 4
2.2 Closed non-conformities 5
2.3 Actions taken by Organisation Prior to Report Finalisation 5
2.4 Notes for the next Audit 5

3 Scope of the audit and SBP certificate **6**

3.1 Description of the company 7
3.2 Site details 7
3.3 Detailed description of the Chain of Custody system and Product Groups 7

4 Specific objective of the audit **9**

5 Evaluation process **10**

5.1 Timing and duration of evaluation activities 10
5.2 Auditor team qualification 10
5.3 Description of evaluation activities 10
5.4 List of forest management units and feedstock suppliers visited 11
5.5 Describe audit sampling methodology used 14
5.6 CB stakeholder engagement 15
5.7 Stakeholder feedback and response 15
5.8 Main strengths and weaknesses of the management system and operations 15
5.9 Summary of evaluation activities for robustness of the Supply Base Evaluation 15
5.10 Summary of evaluation activities for Processing residues and/or Post-consumer feedstock requirements per Standard 2 and EU RED 15
5.11 Summary of evaluation activities for chain of custody system per Standard 4 16
5.12 Summary of evaluation activities for collection and communication of data per Standard 5 16
5.13 Summary of audit findings for competency of involved personnel 16
5.14 Summary of audit findings for GHG methodology per Standard 6 (if applicable) 16

6 Detailed evaluation of BP's Supply Base Evaluation (if applicable) **17**

6.1 Overview of BP's risk assessments and mitigation measures including EU RED scope 17
6.2 CB evaluation of specified risk indicators and mitigation measures 18

1 Overview

Certification Body (CB) Name:	Preferred by Nature OÜ
Primary CB contact for SBP:	Pilar Gorria Serrano
Primary CB contact email:	pgorria@preferredbynature.org
Audit team leader:	Lennart Holm
Audit team members:	-
Name of the Company:	Bøn Biobrensel AS
Company legal address:	Bønsdalen Industriveg 30, 2073 Akershus Bøn, Norway
Company contact for SBP:	Tadesse Negash
Company contact email:	tadesse.negash@geminor.no
Company website:	
Date of installation:	
SBP Certificate Code:	SBP-15-03
Date of certificate issue:	22 Oct 2026
Date of certificate expiry:	21 Oct 2031
Audit closing meeting date:	03 Jul 2026
Audit cycle:	Main (Initial) Audit

2 Audit conclusions

2.1 Certification decision

Based on the auditor's recommendation and the Certification Body's technical review, the following certification decision is taken:	
Certification decision:	Certification approved
Certification decision by (name of the person):	Pilar Gorria
Date of decision:	04 Sep 2026
Other comments:	N/A

2.2 Open non-conformities and observations

2.2 Closed non-conformities

2.3 Actions taken by Organisation Prior to Report Finalisation

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2.4 Notes for the next Audit

Verify DTS

3 Scope of the audit and SBP certificate

Scope item	Check all that apply to the Certificate scope
Primary activity	Biomass Producer
Secondary activity	Trader
Approved Standards	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 EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413; Instruction Document 5E: Collection and Communication of Energy and Carbon data. v2.1
Product Group IDs	☒ Forest feedstock (1A) ☒ Trees outside forest (TOF) - Urban and landscape feedstock (2A) ☐ Trees outside forest (TOF) - Agricultural land feedstock (3A) ☒ Processing residues feedstock (4A) ☒ Post-consumer feedstock (5A) ☐ Other (please specify)
SBP Feedstock types	☒ SBP Compliant; ☒ SBP Controlled
Includes Supply Base Evaluation (SBE)	Yes
Includes EU RED Scheme	Yes
Includes EU RED Supply Base Evaluation (SBE)	Yes
Products	WB 2.1 Wood chips, WB 2.2 Sawdust, WB 2.3 Wood shavings, WB 2.4 Other residues from wood processing, WB 4.1 Roundwood
Feedstock origin (countries):	Norway
SBP-endorsed Regional Risk Assessments used: **Public link:** https://sbp-cert.org/documents/standards-documents/risk-assessments/	SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim
Chain of custody system	☐ Physical separation ☒ Mass balance
Outsourcing	Yes
Changes in the scope	N/A. Main assessment

3.1 Description of the company

Guidance: Please describe the type, structure and operations of the company including its role in the supply chain, its inputs and outputs as they related to SBP Standards.

Bøn Biobrensel AS is a Norwegian biomass producer and trader located at Bønsdalen Industriveg 30, 2073 Bøn. Bøn Biobrensel AS became part Geminor group in 2019. Geminor is certified to ISO 9001, ISO 14001 and ISO 45001. The company sources and handles primary forest feedstock , TOF category 2A material, processing residues from sawmills, and post-consumer garden waste from municipal recycling stations for biomass production. The material is received at the company's storage sites, including Bøn/Bønsdalen, Storøy, Rømskog and Rødskjær, where it is stored, dried, chipped and prepared for delivery to off-takers by road or boat. Bøn sells biomass in the form of wood chips and sawmills, bark, shavings and biologs. All feedstock is managed through documented traceability and mass balance systems. Primary forest feedstock is sourced with 100% PEFC / PEFC - (certificate code - PBN-PEFC-COC-056524-G) origin and FSC Controlled Wood claims (certificate code PBN-COC-056524), while processing residues are sourced as 100% PEFC-certified material. SBE with STD 1 is applicable only to primary feedstock from PEFC Certified forest. TOF and post-consumer material are supported by supplier declarations and origin documentation. Bøn Biobrensel applies SBP procedures covering SBP Standards 1, 2, 4 and 5, and also maintains controls related to PEFC, FSC CoC, FSC Controlled Wood, EU RED and EUDR supplier declarations.

3.2 Site details

Legal entity name	Address	Site Activity	Visited during the audit
Bøn Biobrensel AS	Bønsdalen Industriveg 30, 2073 Akershus Bøn, Norway	Biomass Producer and trader with storage	☒
Rømskog	Storveien 135, 1950 Rømskog, Norway	Storage site	☒
Rødskjær	Rødskjær, 9430 Sandtorg, Norway	Storage site	☐
Storøy	Storøyvegen 75, 4260 Torvastad, Norway	Storage site	☐

3.3 Detailed description of the Chain of Custody system and Product Groups

Guidance: Please describe the operation of the CoC system including details of the mass balance management and a list of established Product Groups.

Bøn Biobrensel sources primary and secondary feedstock from forests and sawmills, TOF category 2A material from local entrepreneurs, and post-consumer garden waste from municipal recycling stations. All feedstock is managed through a documented PEFC and FSC CoC traceability system, where origin, certification claim, supplier documentation, quantity and storage location are recorded from source until the material is received at one of the company's storage sites. A separate mass balance system is kept for each storage site. Feedstock with different sustainability claims is kept physically separate, and SBP-compliant or SBP-controlled material is not mixed with non-eligible material. If such mixing occurs, the material loses its SBP claim. Main SBP product groups include wood chips from forest feedstock, wood chips from TOF urban and landscape material, sawdust/wood shavings from processing residues, and garden waste from post-consumer feedstock. When feedstock arrives at a storage site, it enters Bøn Biobrensel's possession together with the required certification claim and origin evidence. The material is stored and dried to reduce moisture content before it is chipped. After chipping, the biomass is either stored before

final delivery or transported directly to the customer by road or boat. Bøn Biobrensel applies SBP Standards 1, 2, 4 and 5, covering feedstock compliance, verification of SBP-compliant feedstock, chain of custody, and collection and communication of energy and carbon data. The company also maintains controls related to PEFC, FSC CoC, FSC Controlled Wood, EU RED and EUDR supplier declarations, where applicable. Bøn Biobrensel has established a documented SBP Chain of Custody system to ensure continuous traceability of feedstock and biomass from supplier approval, receipt, processing and storage through to final delivery and invoicing. Landax is used as the central system for storing and controlling SBP procedures, SOPs, supplier documentation, stakeholder records, internal audits, subcontractor records and non-conformance handling. The Inventory Control Sheet is used to for Mass and Energy Balance, stored in Teams. The management system is based on SBP procedures, Landax document control, Teams-based inventory and mass balance sheets, and SBP DTS reporting.

4 Specific objective of the audit

The objective of this evaluation was to confirm that the Biomass Producer's management system is capable of ensuring that all requirements of specified SBP Standards are implemented across the entire scope of certification. The scope of this evaluation also covered the their mitigation measures, Level B Sustainability criteria as well as EU RED III requirements for primary and secondary feedstock.

The scope of the evaluation covered
- Review of the BP's management procedures, including requirements designated in applicable SBP Standards and Instruction Documents;
- Review of the production processes, production site visit;
- Review of the updated Supply Base Report;
- Review of the risk assessment results;
- Review of SBP system control points, analysis of the existing FSC and PEFC CoC system;
- Evaluation of mitigation measures implemented for primary feedstock (including inspection of primary feedstock supplies);
- Review of the records, calculations and conversion factors;
- GHG data collection analysis
- Interviews with responsible staff;
- EU RED III requirements
- Level B sustainability criteria for primary feedstock from Norway
- Risk Assessment and Mitigation under SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim

5 Evaluation process

5.1 Timing and duration of evaluation activities

Audit Level of Effort (LoE)		
Activity	**Auditors**	**Auditor hours**
1. Preparation	Lennart Holm	4.0
2. On-site (excl. travel time)	Lennart Holm	24.0
3. Report writing	Lennart Holm	10.0
4. Other	Lennart Holm	4.0

5.2 Auditor team qualification

Auditor qualification		
Auditor name	**Role**	**Qualification**
Lennart Holm	Lead Auditor	Lennart has over 25 years of auditing experience in Forest Management; Chain of Custody, SBP, GGL, Enplus and SDE+ audits, for various CBs. Lead SBP, ENplus, GGL, SDE+ and FSC, PEFC and SFI FM/COC auditor, as well as ISO9001 and ISO14001 lead auditor, and successfully passed the SBP auditor training program for V1 and V2 of the SBP standards.

5.3 Description of evaluation activities

This main assessment audit occurred between July 1 to 3, of 2026. The audit was conducted on-site at Bøn Biobrensel office in Bøn, Norway as well as visit to selected FMUs for verification of primary feedstock supplies under the RRA in Norway as well as supplies of TOF-Urban and Landscape feedstock, selected suppliers of processing residues and a visit to their only supplier of post-consumer feedstock, all located in Norway. The audit consisted of an opening meeting, during which the scope was confirmed. The auditor also explained the methods to be employed during the audit. During the audit, all relevant requirements of the applicable SBP standards were verified on compliance through the use of a report template and checklists, as well as interviews with the below mention individuals were made. Visits to feedstock suppliers were done. Harvest sites for verification of mitigation measures was visited, see section 5.4 for details. During the site visits, responsible staff was interviewed to evaluate the production process and to determine the implementation of mitigation measures for Primary feedstock under the RRA and eligibility requirements for processing residues, Post Consumer and TOF - Urban and Landscape feedstock types. Additionally, sample records of deliveries were verified to identify the possible supply base and to confirm it is within the declared ones.

A key part of the assessment was the evaluation of the management system for STD 1 and EU RED III requirements; in this context, the auditor was evaluating how Bøn Biobrensel staff is doing audits for all feedstock

supplies and evaluating their compliance with the SBP standards and how risk from the RRA for primary feedstock is implemented on the ground. An evaluation of suppliers training program was made. The audit was completed by filling in the audit checklist and discussing the audit results.

This report is the result of the findings of an audit carried out by an independent lead auditor. The purpose of the assessment was to assess the client's compliance with the standards used within the scope of the certificate.

A sufficient amount of people were interviewed during the site and field visits, where names withheld due to Data Protection Legislation

Critical Control points were evaluated and found to be sufficiently well managed and controlled.

A closing meeting was conducted where auditor summarized scope change audit conclusions and next steps where clarified.

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5.4 List of forest management units and feedstock suppliers visited

☐ N/A – No forest sites or suppliers visited during this evaluation

Site name
Breigskøren
Site location
Elvskog
Site description
Ongoing second commercial thinning in a 6.0 ha mixed pine/spruce/birch stand of 50 years. The site is PEFC FM (245667-2017-AE-NOR-NA) and FSC CW (SA-CW-002805) certified.
Rationale and focus of visit
Verification of implementation of mitigation measures and the cascading principle.
Description of audit activity
private forest. Harvest prescription and planning documents verified, leave tree characteristics evaluated. Cascading principle evaluated with evidence of several sorts such as sawlogs, pulpwood and pine posts. Only Energiwood sold to Bøn. Interview with supplier and machine operator. Level B management system evaluated with retention of stumps and roots, no-go areas and retention of deadwood

Site name
Grønnkollen
Site location
Elvskog

Site description
Ongoing second commercial thinning in a 11.7 ha pine leading stand of 50 years. The site is PEFC FM (245667-2017-AE-NOR-NA) and FSC CW (SA-CW-002805) certified.
Rationale and focus of visit
Verification of implementation of mitigation measures and the cascading principle.
Description of audit activity
private forest. Harvest prescription and planning documents verified, leave tree characteristics evaluated. Cascading principle evaluated with evidence of several sorts such as sawlogs, pulpwood and pine posts. Only Energiwood sold to Bøn. Interview with supplier and machine operator. Level B management system evaluated with retention of stumps and roots, no-go areas and retention of deadwood

Site name
Jeribo
Site location
Elvskog
Site description
Concluded final harvest of 2.1 ha spruce stand of 80 years which has been re-planted. The site is PEFC FM (245667-2017-AE-NOR-NA) and FSC CW (SA-CW-002805) certified.
Rationale and focus of visit
Verification of implementation of mitigation measures and the cascading principle.
Description of audit activity
Private forest. Harvest prescription and planning documents verified, leave tree characteristics evaluated. Cascading principle evaluated with evidence of several sorts such as sawlogs, pulpwood and pine posts. Only Energiwood sold to Bøn. Interview with supplier. Level B management system evaluated with retention of stumps and roots, no-go area, clear cuts threshold and retention of deadwood

Site name
Bogtjern
Site location
Elvskog
Site description
Concluded final harvest of 1.3 ha mixed spruce/pine stand of 75 years The site is PEFC FM (245667-2017-AE-NOR-NA) and FSC CW (SA-CW-002805) certified.
Rationale and focus of visit
Verification of implementation of mitigation measures and the cascading principle.
Description of audit activity
Private forest. Harvest prescription and planning documents verified, leave tree characteristics evaluated. Cascading principle evaluated with evidence of several sorts such as sawlogs, pulpwood and pine posts. Only Energiwood sold to Bøn. Interview with supplier. Level B management system evaluated with retention of stumps and roots, no-go areas and retention of deadwood

Site name
Retura Østfold
Site location
Askim
Site description
Municipal Recycling Depot supplying post consumer feedstock to Bøn Biobrensel
Rationale and focus of visit
To verify eligibility of post-consumer feedstock as being woody residues (mulched ornamental, landscaping, or amenity use)
Description of audit activity
On site visit, and responsible staff was interviewed to evaluate the reception and separation of post consumer feedstock, and to determine the feedstock matches the declared types. It was observed that the feedstock is stored separately at the recycling depot.

Site name
G3 Gausdal Treindustrier SA
Site location
Østre Gausdal
Site description
sawmill supplying woodchips to Bøn Biobrensel
Rationale and focus of visit
To verify eligibility of processing residues as being wood chips no intentionally produced.
Description of audit activity
On site visit, and responsible staff was interviewed to evaluate the production process and to determine the feedstock matches the declared types. It was observed that the sawdust is stored separately in a box at the supplier wood yard. Additionally, sample records of deliveries were verified to identify the possible supply base and to confirm it is within the declared ones.

Site name
Ringalm AS
Site location
Nordkisa
Site description
sawmill supplying woodchips to Bøn Biobrensel
Rationale and focus of visit
To verify eligibility of processing residues as being wood chips no intentionally produced.
Description of audit activity
On site visit, and responsible staff was interviewed to evaluate the production process and to determine the feedstock matches the declared types. It was observed that the sawdust is stored separately in a box at the supplier wood yard.

Additionally, sample records of deliveries were verified to identify the possible supply base and to confirm it is within the declared ones.

Site name
Begna Bruk AS
Site location
Bagn
Site description
sawmill supplying woodchips to Bøn Biobrensel
Rationale and focus of visit
To verify eligibility of processing residues as being wood chips no intentionally produced.
Description of audit activity
On site visit, and responsible staff was interviewed to evaluate the production process and to determine the feedstock matches the declared types. It was observed that the sawdust is stored separately in a box at the supplier wood yard. Additionally, sample records of deliveries were verified to identify the possible supply base and to confirm it is within the declared ones.

Site name
Vattenledning Eidsvoll
Site location
Eidsvoll
Site description
TOF - Urban and landscape, where Eidsvoll municipality is extending the water mains and improve a bicycling lane, resulting in the removal of approximately 20 trees.
Rationale and focus of visit
To verify implementation of TOF - Urban and landscape, and the legality of such activities
Description of audit activity
On-site visit where the contract with the municipality was verified and a review of the activity which has very low impact due to the already existing watermains and bicycling lane.

5.5 Describe audit sampling methodology used

During audit preparation, a sampling plan was developed based on the following criteria: - A review of documentation related to energy and carbon data for the chosen SAR reporting period. – Inspection of field sites with on-going and concluded harvest to verify company procedures and implementation of mitigation measures. Since this was main assessment and no material has been recorded as certified, FMUs were selected where BP has implemented RMM and Management system and where their main supplier have on-going and recently concluded activities resulting in visits to 4 FMUs, all on private land. - Out of 7 suppliers of processing residues, 4 were visited using the square root of 7 to calculate the sample. - One ongoing activity classified as TOF - Urban and Landscape was visited. - Out of 4 storage sites, 2 were visited using the square root of 4 to calculate the sample. - Their only supplier of post-consumer feedstock was visited. All applicable and existing documents and procedures subject to the applicable SBP requirements were reviewed. All relevant staff were interviewed

5.6 CB stakeholder engagement

☐ N/A – Certification Body stakeholder consultation not applicable for this evaluation

Guidance: Please specify the number and types of stakeholders engaged, method of engagement and its outcomes.

Bøn Biobrensel did formally consult with stakeholders prior to the main assessment between May 29 to June 28, 2026. No specific objections or significant negative stakeholder comments have been recorded.
In the "List of Stakeholders_Stakeholder Engagement Plan and Preliminary Impact Assessment", Bøn Biobrensel has established a Stakeholder Engagement Plan (SEP) to describe how relevant stakeholders are identified, consulted and engaged as part of the SBP management system. The process covers two main areas: consultation on the Risk Management Plan (RMP), Risk Management Measures (RMMs) and Means of Verification (MoVs) within the Norwegian Supply Base under SBP Standard 2, and stakeholder engagement related to the company's own Chain of Custody and operational impacts under SBP Standard 4. The plan is appropriate for the business of Bøn Biobrensel.

5.7 Stakeholder feedback and response

☐ N/A – Certification Body stakeholder consultation not applicable for this evaluation

E-mails verified and no records in Landax of comments from stakeholders were noted, other than interactions with other large scale BPs in Norway to discuss mitigation measures and EU RED requirement.

5.8 Main strengths and weaknesses of the management system and operations

Strengths: The audit of Bøn Biobrensel demonstrated a good level of compliance with the required criteria of Standards 1, 2, 4 and 5, and the EU RED requirements. There was reasonable evidence provided to support compliance where a Non-Conformity was not detected.
The existence of FSC and PEFC Chain of Custody system in combination with
ISO 9001, ISO 14001 and ISO 45001 are considered a main strength with respect to Bøn Biobrensel overall conformity with the relevant SBP standards.
Weaknesses: No weaknesses detected

5.9 Summary of evaluation activities for robustness of the Supply Base Evaluation

☐ N/A – Standard 1 not in the scope of the evaluation

Bøn Biobrensel utilized the Interim Regional Risk Assessment for PEFC-certified Norway Forest (SBP-RRA-EU-NO-FOR v1.0) for the identification of risks and implementation of recommended risk mitigation measures.

5.10 Summary of evaluation activities for Processing residues and/or Post-consumer feedstock requirements per Standard 2 and EU RED

Bøn Biobrensel requires each supplier to sign a Supplier Declaration, where the supplier declares the type of residue supplied and origin.
This is followed up with annual internal audits. The organization does not include volumes from any supplier until the supplier declaration has been signed and a visit to the company has been conducted.

Auditor verified this during 3 supplier visits of suppliers of processing residues and one visit to their only supplier of post-consumer feedstock.

Further, auditor investigated supply chain risks, such as the potential for mixing volumes from different categories or origins, and the probability of making mistakes. Examined was also the possible incentives and the technical capabilities of suppliers to miscategorize the supplied feedstock.

5.11 Summary of evaluation activities for chain of custody system per Standard 4

Bøn Biobrensel has developed and implemented Chain of custody system according Standard 4 requirements, including Business Integrity self assessments and produced a Stakeholder Engagement Plan
The Organization has implemented the requirements as defined in the SBP Standard 4. The CoC system is quite straight forward, no mixing of produced SBP Certified with non-compliant biomass is accepted before sale to customers. The Organization has procedures in case of doubts or unclarities if non-controlled biomass has entered the production facility, which include a quarantine of the material in question until its status can be verified.

For EU RED III scope, Bøn Biobrensel implements a mass balance system with three months balancing period.

5.12 Summary of evaluation activities for collection and communication of data per Standard 5

Bøn Biobrensel was supported by the external consultant who developed in depth procedures for this. The auditor confirmed the approach to the calculation of Greenhouse Gas (GHG) sources for feedstock input, chipping both in the forest as well as at the storage sites and transportation, as well as reviewed how the input data was measured. Findings were substantiated by on-site staff interviews with operations personnel on the overview of the operations, historical operations, changes to operations, procedures and processes used to maintain the operations, and procedures and processes used to ensure data quality. Bøn Biobrensel demonstrated full competency to analyze and report the required data on Greenhouse Gas emissions.

5.13 Summary of audit findings for competency of involved personnel

Staff members involved into the SBP system management and implementation, include the external consultant, Sustainable Biomass Coordinator, Managing Director and Development Account Manager as well as Geminor corporate support staff. Interviewed staff demonstrated awareness of their responsibilities within SBP system. The indelevelmente of the SBP Management System, and the implementation of the SBP certification process is assigned to an external consultant as well as the company's technical team, which consist of managers with a solid background in biomass extraction and many years of experience in forest sector.

5.14 Summary of audit findings for GHG methodology per Standard 6 (if applicable)

☒ N/A – Standard 6 not in the scope

6 Detailed evaluation of BP's Supply Base Evaluation (if applicable)

☐ N/A – Supply Base Evaluation not in the scope of the evaluation

6.1 Overview of BP's risk assessments and mitigation measures including EU RED scope

Bøn Biobrensel utilized the Interim Regional Risk Assessment for PEFC-certified Norway Forest (SBP-RRA-EU-NO-FOR v1.0) for the identification of risks and implementation of recommended risk mitigation measures.

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For EU RED Scope the followong documents are used:

- Bøn Biobrensel adopts the "REDIII Level A Risk Assessment for Norway Forest v1.0" which SBP has had in consultation in June 2026. Bøn Biobrensel consider this the best possible reference for its Level B – management system at forest sourcing area level as follows:

iv) Harvesting of stumps and roots: Harvesting of stumps and roots is rare in Norway, but it is not legally prohibited. Based on current practices, this could be assessed as level A, but because harvesting of stumps and roots is not formally forbidden, we conclude with level B.

iv) Maximum thresholds for large clear-cuts

The typical size of a clear-cut in Norway is 2–3 ha. Bigger harvesting lots do occur. There are no general legal restrictions on the size of clear-cuts. There are cases where Level A can be justified because additional measures or local regulations are implemented, while for others, there is no strong evidence to cover Level A at the country level.

iv) Degradation of primary forests and old-growth forests – Level B:

iv) Retention thresholds for deadwood extraction – Level B

In Norway, legislation and industry standards work together to manage deadwood, though specific legal thresholds are currently lacking at the national level. Under the Forestry Act and the Regulation on Sustainable Forestry, forest owners are generally required to consider environmental values and biological diversity during harvesting. However, since national legislation does not define specific local or ecologically appropriate retention thresholds for deadwood extraction, these requirements are not met at Level A.

vi) No-go areas: Primary forest and Old-growth forest is not automatically protected according to Norwegian law, and the term is not used in national legislation. Data from the National Forest Inventory (NFI) indicates that forests older than 160 years—which is significantly older than the typical harvesting age—comprised 3.6% of Norwegian forests in 2020, an increase from 2% in 2002. While a significant portion of this old forest is protected through nature reserves, national parks, or as key biotopes under the Forestry Act, there is no legal guarantee that all old-growth forest is protected from harvesting.

vi) Heathlands: As heathland is a "no-go-area" and as the legislation does not provide a formal protection regime that specifically prevents biomass from being harvested for energy purposes from these areas, Level B is requested. Most relevant heathland is "*Coastal heathland refers to heath-like and mainly forestless areas in an oceanic climate, dominated by dwarf shrubs, especially heather (Calluna vulgaris), formed by clearing scrub and forest, and conditioned by long-term maintenance of grazing, and in many places, heather burning and heather mowing"*

BPs management system:

The management system was evaluated during the audit on sampled FMUs. In all cases harvesting planning documents and permits have been obtained and analysed by Bøn Biobrensel, and they have conducted the harvesting operation in public and private forest with their own means.

Forestry activities have been monitored by forestry authorities and mitigation measures are implemented and are aligned with the RRA developed for Norway as implemented by Bøn Biobrensel

When SBP has endorsed the Level A, Bøn Biobrensel will update its procedures accordingly if needed.
- SBP REDII Level A Risk Assessment for Article 29(7) LULUCF v1.5 (May 26, 2026).
- Norway´s Enhanced NDC Submission (2022), UNFCCC

6.2 CB evaluation of specified risk indicators and mitigation measures

Country
Norway
Area/Sub-Scope
PEFC-certified forests
Indicator
2.1.1 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.
Specified risk description
For already identified sites including red list species in categories vulnerable or higher and sites protected by the government (natural park, nature reservations), key biotopes by the Nature Diversity Act, the risk conclusion is low risk. For large continuous forest areas with a more natural and untouched appearance Trysil, Pasvik, Lierne and Kautokeino, which are not protected by law or the PEFC system, but whose biological importance is well known (IFL map), the risk conclusion is specified risk. Other forest areas with special environmental values, key habitats and biologically important areas might not be identified through governmental and PEFC mechanisms, and it requires additional attention to make sure that all biological importance is identified, for those areas the risk conclusion is specified risk. In the case of a forest that is FSC certified, the risk conclusion is low risk due to additional mechanisms implemented by the FSC certification to ensure that the above risks are low.
Detailed description of a mitigation measure
BØN BIOBRENSEL AS is adhering to Option 1 in the mitigation measures for 2.1.1 put forth in the RRA, which is to ensure that the PEFC FM-certified wood is also coming from an FSC CW/FM certified/controlled Forest Management Enterprise. This combination ensures identification and protection of key habitats and HCV areas.
Detailed description of CB evaluation of mitigation measure and its conclusions

1. Auditor analyzed a sample of entries of primary feedstock received in the reporting period and evaluated certification status of the supplier and the harvested FMU, together with harvest prescription, planning documents, purchasing agreements, delivery notes, invoices, supplier audits, internal checklist, origin information, etc.
2. Auditor analyzed geo-coordinates of a sample of entries and verified with geo databases potential HCV
3. Auditor witnessed how company staff evaluated certification status, supplier agreements, harvesting practices and HCV.
4. Mitigation found sufficient to ensure that the feedstock is received as low risk

Country
Norway
Area/Sub-Scope
PEFC Certified Forest
Indicator
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).
Specified risk description
Protection of HCV areas is described under indicator 2.1.1. The analysis and assessment are also valid for this indicator (3.2.3). There are in Norway no formal classification of HCV forest in relation to carbon storage. However, this aspect is considered most relevant for the HCV categories 1 – 3, which covers the most valuable old forest. Protection of HCV forest is in this document generally described under indicator 2.1.1. Some areas might be important for carbon stock, even if the standing stock of wood is low. This is typically for swamps/peatland and some wetland. These are areas with very little forestry activity, and low importance to forestry, as new diching of such areas has been prohibited since 2006. For indicator 3.2.2, the harvesting for different site-indexes has been described. Wetland and swamps will normally be classified as the poorest site index or impediment. However, extensive harvesting on wetland would very little affect the carbon stock, as the main carbon storage on wetland is below ground. RRA concludes as follows: Primary forest and old growth forest – Specified risk: For large continuous forest areas with a more natural and untouched appearance Trysil, Pasvik, Lierne and Kautokeino, which are not protected by law or the PEFC system, but whose biological importance is well known (IFL map) and other minor areas similar where the trees are older than 160 years, the risk conclusion is specified risk. A forest older than 160 years may qualify as old-growth forest. Heathland in climax stage – Specified risk As heathland in climax stage is a “no-go-area” and neither the legislation nor the PEFC standard provides any formal protection regime that specifically prevents biomass from being harvested for energy purposes from these areas, a requirement for not harvesting in any heathland in climax stage can hardly be assessed to be low risk
Detailed description of a mitigation measure
BØN BIOBRENSEL AS is only sourcing 100% PEFC certified wood that is also FSC Controlled Wood. This aligns with the first option of Mitigation Measures for 3.2.3 put forth in the RRA: Control if the wood is sold from a wood trader holding a valid certificate for FSC_COC-CW in addition to a valid PEFC FM certificate.

Bøn Biobrensel also implements a focused mitigation measure that includes site visits at the FMUs and disqualification of the material when compliance with the requirement cannot be confirmed and showing the wood is not harvested at the selected habitat type, Coastal heathland.

Additionally, BP implements a management system to ensure no.go areas are excluded from their sourcing areas. In all cases harvesting planning documents and permits have been obtained and analysed by Bøn Biobrensel, and they have conducted the harvesting operation in public and private forest with their own means. Forestry activities have been monitored by forestry authorities and mitigation measures are implemented and are aligned with the RRA developed for Norway as implemented by Bøn Biobrensel.

Detailed description of CB evaluation of mitigation measure and its conclusions

1. Auditor analyzed a sample of entries of primary feedstock received in the reporting period and evaluated certification status of the supplier and the harvested FMU, together with harvest prescription, planning documents, purchasing agreements, delivery notes, invoices, supplier audits, internal checklist, origin information, etc.
2. Auditor analyzed geo-coordinates of a sample of entries and verified with geo databases potential HCV
3. Auditor witnessed how company staff evaluated certification status, supplier agreements, harvesting practices and HCV.
4. Mitigation found sufficient to ensure that the feedstock is received as low risk