Compliance with the SBP Framework: Public Summary Report

Preferred by Nature OÜ
Evaluation of LEAG Pellets GmbH, Werk Wismar

Fourth Surveillance 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

Version 2.0	**Published 10 August 2023**
Version 2.1	Published 21 May 2025

© Copyright Sustainable Biomass Program Limited 2025

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 6
2.3 Actions taken by Organisation Prior to Report Finalisation 7
2.4 Notes for the next Audit 7

3 Scope of the audit and SBP certificate **8**

3.1 Description of the company 9
3.2 Site details 9
3.3 Detailed description of the Chain of Custody system and Product Groups 9

4 Specific objective of the audit **10**

5 Evaluation process **11**

5.1 Timing and duration of evaluation activities 11
5.2 Auditor team qualification 11
5.3 Description of evaluation activities 11
5.4 List of forest management units and feedstock suppliers visited 12
5.5 Describe audit sampling methodology used 13
5.6 CB stakeholder engagement 13
5.7 Stakeholder feedback and response 13
5.8 Main strengths and weaknesses of the management system and operations 13
5.9 Summary of evaluation activities for robustness of the Supply Base Evaluation 14
5.10 Summary of evaluation activities for Processing residues and/or Post-consumer feedstock requirements per Standard 2 and EU RED 14
5.11 Summary of evaluation activities for chain of custody system per Standard 4 14
5.12 Summary of evaluation activities for collection and communication of data per Standard 5 14
5.13 Summary of audit findings for competency of involved personnel 14
5.14 Summary of audit findings for GHG methodology per Standard 6 (if applicable) 14

6 Detailed evaluation of BP's Supply Base Evaluation (if applicable) **16**

6.1 Overview of BP's risk assessments and mitigation measures including EU RED scope 16
6.2 CB evaluation of specified risk indicators and mitigation measures 16

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:	Christian Jürgensen
Audit team members:	Michael Kutschke
Name of the Company:	LEAG Pellets GmbH, Werk Wismar
Company legal address:	Verwaltung Wismar Am Torney 2a, 23970 Wismar, Germany
Company contact for SBP:	Sylwia Senczyszyn
Company contact email:	sylwia.senczyszyn@leag.de
Company website:	
Date of installation:	
SBP Certificate Code:	SBP-01-89
Date of certificate issue:	12 Jan 2023
Date of certificate expiry:	11 Jan 2028
Audit closing meeting date:	10 Jun 2026
Audit cycle:	Fourth Surveillance 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:	07 Sep 2026
Other comments:	N/A

2.2 Open non-conformities and observations

NC number 9075	NC Grading: Observation
Standard:	SBP Standard 4: Chain of Custody v2.0
Requirement:	4.19 The Organisation shall make available to the CB all mass balance data in advance of the planned audit. N/A N/A N/A
Description of Non-conformance and Related Evidence:	
The Organisation did not make available to the CB all mass balance data in advance of the planned audit, and an observation is raised. Even though the audit team did not request the mass balance in advance of this audit, the organisation is advised to make the mass balance account available to the audit team before all future audits in order to fulfil the criterion.	
Timeline for Conformance:	N/A
Evidence Provided by Company to close NC:	N/A
Findings for Evaluation of Evidence:	N/A
NC Status:	Open
Original Due Date:	N/A
Closing Date:	N/A
Upgrade Date:	N/A
Update Date:	N/A

NC number 9077	NC Grading: Minor
Standard:	SBP Standard 2: Feedstock Verification v2.0
Requirement:	7.3 Where there are no RMMs proposed by SBP, the Organisation shall develop its own, based on available best practice, knowledge of its specific suppliers and risk

	factors, and other relevant factors. N/A N/A N/A
Description of Non-conformance and Related Evidence:	
Where SBP proposes no RMMs, the Organisation has developed its own for the specified-risk indicators based on available best practice and knowledge of its supplier and sourcing area. For indicator 3.2.3 (combined high carbon stock and HCV), the Organisation has established a no-go screening measure: suppliers provide the geolocation of each sourcing plot (Polter/Waldort), which is checked against online maps, satellite imagery and protected-area/Natura 2000 databases, supported by an internal definition of excluded old-growth forest (≥10 native trees older than 180 years per hectare) and by on-site inspection where the desk screening leaves doubt; material that does not pass is excluded. These procedures are documented and were being implemented at the time of the audit. However, the field visit showed the measure was not yet fully effective in practice: Selectively harvested 122-year-old spruce trees (that had supplied low-ragde stemwood for pellet production) was found in a sourcing area alongside an unknown, minor number of standing older (~202-year) oak/beech, leaving residual doubt as to whether the source area combines high carbon stock and HCV. Because the RMM had not, in this instance, reduced the specified risk to low with full certainty, a minor non-conformity (NC 9077) was raised during this audit.	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	N/A
Findings for Evaluation of Evidence:	N/A
NC Status:	Open
Original Due Date:	2027-09-07
Closing Date:	N/A
Upgrade Date:	N/A
Update Date:	N/A

2.2 Closed non-conformities

NC number 9076	NC Grading: Minor
Standard:	SBP Standard 4: Chain of Custody v2.0
Requirement:	4.10 For Organisations opting to use a mass balance system for material accounting, the Organisation shall set up and maintain a mass balance account to which additions and deductions of eligible input for a single physical site shall be recorded. Note 1: A mass balance system allows consignments of feedstock or biomass with differing sustainability and greenhouse gas emissions savings characteristics to be mixed for instance in a container, processing or logistical facility, transmission and distribution infrastructure or site. Note 2: Site is a single functional unit of an Organisation situated at one physical location, which is geographically distinct from other units of the same Organisation. An Organisation's units with distinct physical locations may, however, be regarded as part of a site if they are an extension of it with no purchasing, processing, or sales functions of their own (e.g., a remote stockholding). A site can never include more than one legal entity. Subcontractors that are used within the terms of outsourcing agreements (e.g., outsourced warehouse) are not considered sites. Typical examples for sites are processing or trading facilities such as manufacturing sites, sales offices, or company-owned warehouse. N/A N/A
Description of Non-conformance and Related Evidence:	
The Organization displayed the raw datafile that was used to calculate respectively the share of sourced processing residues that were certified to an SBP-recognised certification scheme and the share sourced to as certified to an SBP-recognised controlled scheme. However, the datafile had wrongfully registered non-certified volumes as certified and non-certified volumes as certified for a range of deliveries affecting two months. Thus, a non-conformance was raised. The non-conformance was graded minor due to the large surplus of SBP Compliant feedstock in the mass-balance account, the limited timeperiod affected by the error and the fact that the datafile-format had already been updated preventing the error from reoccurring in the same manner going forward.	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	The root cause was identified as a human error in relation to copy-pasting in a excel-sheet. The datafile had one column with a mix of claims that needed to be manually sorted and placed in adjacent columns in the same Excel-file. This leaved room for human errors and accidental Excel auto copying and pasting. The organization was able to correct the file and mass balance account before the finalization of this report.
Findings for Evaluation of Evidence:	Enough to close the non-conformance.
NC Status:	Closed
Original Due Date:	2027-09-07
Closing Date:	2026-09-07
Upgrade Date:	N/A
Update Date:	N/A

2.3 Actions taken by Organisation Prior to Report Finalisation

2.4 Notes for the next Audit

n.a

3 Scope of the audit and SBP certificate

Scope item	Check all that apply to the Certificate scope
Primary activity	Biomass Producer
Secondary activity	
Approved Standards	SBP Standard 2: Feedstock Verification v2.0; SBP Standard 1: Feedstock Compliance 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 1.1 Wood pellets
Feedstock origin (countries):	Germany, Norway, Poland, Sweden, Denmark, Finland, Estonia, Lithuania, Latvia, United Kingdom
SBP-endorsed Regional Risk Assessments used: **Public link:** https://sbp-cert.org/documents/standards-documents/risk-assessments/	Not applicable
Chain of custody system	☐ Physical separation ☒ Mass balance
Outsourcing	No
Changes in the scope	This is the first annual audit with SBE for Germany in the scope. The audit only covered STD 1 and STD 2 applicable requirements to include SBE in the scope.

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.

LEAG Pellets GmbH, Werk Wismar (also referred to as Wismar Pellets) is a wood pellet producer located in Wismar, Mecklenburg-Vorpommern, on the Baltic Sea coast of northern Germany. The company has an annual production capacity of approximately 250,000 tonnes of wood pellets. The pellet production plant became operational in 2005 as German Pellets and bought by MEP under the name of Wismar Pellets in May 2016. In 2023, the plant was acquired by the LEAG Group. When the ownership changed, the plant was modernized which allows the plant to obtain a high-quality product that ensures the most demanding requirements of international customers. The company is located in the Wismar port which is a strategic location for purchase of feedstock and sales. Two large primary processors are located nearby. The BP is using both primary (Roundwood), secondary (wood chips and sawdust) and tertiary (dried sawdust and cutoffs from secondary processors) feedstock for their production. Reclaimed material (A1 and A2) is used in the dryer. The roundwood used at the production comes mostly from Germany and smaller amounts from eastern Europe. In the future, FSC certified roundwood from Latvia could be included. Secondary feedstock (sawdust, wood chips, shavings, wood offcuts) is sourced from primary processors in Germany, Norway and Sweden but as these suppliers are sourcing the material elsewhere the supply base can potentially contain more countries (such as Germany, Poland, Norway, Sweden, Denmark, Finland, Estonia, Lithuania). The BP also source tertiary feedstock (dried sawdust and cutoffs from secondary processors) from Germany. The BP has implemented PEFC credit system and at the same time PEFC Physical separation system for non-certified material. The BP produce both premium and industrial pellets. The pellets are transported by truck to the warehouse located in the nearby harbor where the material is stored until the vessel can be loaded. The biomass is sold at Wismar harbor FOB incoterms.

3.2 Site details

Legal entity name	Address	Site Activity	Visited during the audit
Leag Pellets GmbH Werk Wismar	Am Torney 2A, 23970 Wismar	Pellet plant / Biomass producer	☒

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.

BP holds valid PEFC CoC certificate PBN-PEFC-COC-028807, https://pefc.org/find-certified/details?cbResetParam=1&CID=C-EDWW5I&LID=L-3SMNU0&EID=E-JW2MA4 using both PEFC percentage based method (Volume credits) and physical separation. For SBP Chain of Custody system, organization implements mass balance system including independent mass balance for PGid 1 and 4 (primary and processing residues). Claims and sustainability characteristics are also considered in the mass balance (SBP controlled biomasss, SBP compliant biomass, etc.). Material which is not SBP eligible is not included in the BP's SBP biomass, but physically separated from SBP compliant/controlled feedstock. The BP holds also a valid FSC CoC certificate PBN-COC-028807 https://info.fsc.org/details.php?id=a024y00000o7rfDAAQ&type=certificate The physical separation is assured during the production and storage processes (both feedstock and biomass) by using compliant material for SBP pellets, and non-compliant material for premium pellets which are produced at different time. The compliant and controlled feedstock is used in a mass balance system where the certified proportion is calculated using a production conversion factor and the share (%) of the certified material.

4 Specific objective of the audit

The specific objective of this evaluation was to confirm that the Biomass Producer's management system is capable of ensuring that all requirements of specified SBP Standards are implemented across the entire scope of certification.
The scope of the evaluation covered:
- Review of the BP's management procedures;
- Review of the production processes, production site visit;
- Review of the BP's Supply Base Evaluation;
- Review of PEFC system control points, analysis of the existing PEFC CoC system;
- Interviews with responsible staff;
- Review of the records, calculations and conversion coefficients;
- GHG data collection analysis.
- EU RED III document
- on site visit of secondary feedstock suppliers
- on site visit of primary feedstock suppliers

5 Evaluation process

5.1 Timing and duration of evaluation activities

Audit Level of Effort (LoE)		
Activity	**Auditors**	**Auditor hours**
1. Preparation	Christian Jürgensen, Michael Kutschke	8.0
2. On-site (excl. travel time)	Christian Jürgensen, Michael Kutschke	19.0
3. Report writing	Christian Jürgensen, Michael Kutschke	8.0
4. Other	Christian Jürgensen, Michael Kutschke	2.0

5.2 Auditor team qualification

Auditor qualification		
Auditor name	**Role**	**Qualification**
Michael Kutschke	Team member	M.Sc. in Forestry. Michael is a chain of custody lead auditor in FSC and PEFC and FSC Forest Management lead auditor. Michael is a FSC Trademark expert and has experience from work with Legal Sources (EUTR) and SAN.
Christian Jürgensen	Lead auditor	Christian holds a master's degree in Forestry and Nature Management from Copenhagen University and has more than 15 years of experience within state administration, the UN system and the NGO field. He functions as a senior biomass auditor at Preferred by Nature and coordinates and conducts evaluations in relation to SBP certification and RBP biomass verification, the Danish biomass legislation, PEFC/FSC forest certification and PEFC/FSC traceability certification (CoC).

5.3 Description of evaluation activities

The audit was focused on management system evaluation: division of the responsibilities, documented management system, input material classification (reception and registration), analysis of the existing PEFC system and PEFC system control points as well as GHG data availability.
Description of the audit:
Most SBP related documents connected to the SBP, as well as PEFC CoC system, was provided by the company prior to the audit. This including SBP and PEFC procedures, GHG data summaries and Supply Base Report. The audit started with an opening meeting attended by the SBP and purchase responsible person.

The auditor team introduced themselves and provided information about audit plan, methodology, auditor qualification, confidentiality, and clarified certification scope.
After this, the auditors went through all applicable requirements of the SBP standards no. 1, 2, 4, and 5 and related instruction documents covering input clarification, existing chain of custody system, management system, CoC system, recordkeeping/mass balances, emission and energy data. During this process the EU RED bridging document implementation was also reviewed and the SBE procedures were evaluated. The overall responsible person for SBP system and other relevant staff were interviewed. The existing chain of custody system implementation was reviewed focusing in the Critical Control Points, in particular it was verified reception of the material and it's classification, identification of feedstock origin, production process with the conversion factors associated, mass balance, final product storage and sales, emission and energy data and categorization of input and verification of SBP-compliant biomass. The auditors also visited the pellet production facility, including goods reception and review of records, input of feedstock in production lines, separation system and other critical control.
Further, the audit team visited a secondary feedstock supplier as well as several harvesting sites of the primary feedstock supplier.

5.4 List of forest management units and feedstock suppliers visited

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

Site name
LEAG Pellets GmbH, Werk Wismar
Site location
Am Torney 2a, 23970 Wismar, Germany
Site description
Pellet plant
Rationale and focus of visit
Office audit and tour of processing facility
Description of audit activity
Office audit and tour of processing facility

Site name
Ilim Nordic Timber GmbH & Co. KG
Site location
Am Haffeld 2, 23970 Wismar
Site description
Sawmill supplying sawdust and off-cuts for LEAG Pellets
Rationale and focus of visit
Verifying the composition of the secondary feedstock
Description of audit activity

Interview with key staff, verification of processing reside origin, traceability confirmation

Site name
State Forest Mecklenburg-Vorpommern – Public Law Institution, Forest Office Schlemmin
Site location
Haupstraße 10a 18249 Schlemmin
Site description
Five forest sites where forest thinning operations had ocurred
Rationale and focus of visit
Verifying the orging and composition of roundwood supplied for LEAG Pellets
Description of audit activity
Inspection of forest plots from where material had been sourced, verification of stand ages and composition as well as the suppliers competences and knowledge level.

5.5 Describe audit sampling methodology used

Several different sales and purchase invoices have been checked for the right claims and type of material, Currently just one supplier is defined as supplier for primary feedstock within SBE, auditor selected the unique supplier where BP has started with the SBE implementation

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.

5.7 Stakeholder feedback and response

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

5.8 Main strengths and weaknesses of the management system and operations

Strength: The BP has a small team of dedicated workers. The team has a good understanding of the SBP requirements, even though there has been changes in the team since last audit. The BP has also strengthened its supply system and is now much more present in the forest compared to last year. It is also a very convenient location of the plant, since two big primary producers are located in the same area.
Weaknesses: The previous minor non-conformity on the mass balance datafile (NC 9076) was closed during this audit. However, two new non-conformities and an observation were raised at this audit: an observation on the timely provision of mass balance data (NC 9075), a minor non-conformity on the mass balance datafile claim classification (NC 9076, closed before report finalisation), and a minor non-conformity on the implementation of

the no-go area / HCV-and-high-carbon-stock criterion 3.2.3 (NC 9077, open). The SBE for primary feedstock from Germany is newly implemented and so far covers only a single supplier, which is an area where the management system is still maturing.

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

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

Orgainzation has developed a comprenhensive SBE with a risk assessment and Risk Mitigation Measures to evaluate Specified risk indicators. Same approach is implemented as Management System for EU RED requirements.
The general steps for mitigating the specified risks of the SBE and EU RED Level B report are:
1) Supplier / initial information: suppliers are evaluated; geolocations and basic stand data are provided. Non-compliance increases the supplier's risk level and may add conditions. Additional investigations are triggered by: forests with old trees, heathland, valuable tree species, indications of high biodiversity and habitats, and young stands (after 2007).
2) Procurement check: verify legality and plausibility (location, rights, tree species, ownership type, supply chain, certification claims, biomass type). If possible, obtain evidence about forest type and age.
3) Online map and database review: the sustainability manager cross-checks supplier data, screens for biodiversity values, and reviews for identified areas with conservation value. If needed, documents are requested.
4) On-site verification (when needed): field inspections to clarify habitat type. Where the assessment leave doubts, sourcing areas are non-compliant.
Auditor evaluated the 4 steps describes above with desk review and on site visit on 10.06.2026 of the only supplier of primary material (state forest of Mecklenburg Vorpommern).

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

Auditor verified the Critical Control Points in the Chain of Custody focussing on claims registration, verification of purchase documents, evaluation of volumes in IT system, and production process during sample supplier audits. Interviews, onsite tour and documents were used to assess the CoC.

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

Auditor verified the Critical Control Points in the Chain of Custody focussing on claims and classification of feedstock, registration, verification of purchase documents, evaluation of volumes in IT system, conversion factor, mass balance and production process. Interviews, onsite tour and documents were used to assess the CoC.

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

The organization has had an energy engineer in the team who implemented the system for collection of the emission and energy data. The company supplied the auditor with actual data on Greenhouse Gas emissions where needed and has used default values where allowed. All data are well recorded and accessible

5.13 Summary of audit findings for competency of involved personnel

The organization has had an energy engineer in the team who implemented the system for collection of the emission and energy data. The company supplied the auditor with actual data on Greenhouse Gas emissions where needed and has used default values where allowed. All data are well recorded and accessible.

Further, the organization has forest engineer in the team who implemented the system for RMM implementation. The company supplied the auditor with actual data, forest management evaluation was discussed on site as well as RMM implemented. Good competences were confirmed during the audit.

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

Organization has developed a comprehensive SBE with a risk assessment and Risk Mitigation Measures to evaluate Specified risk indicators. Same approach is implemented as Management System for EU RED requirements.
The general steps for mitigating the specified risks of the SBE and EU RED Level B report are:
1) Supplier / initial information: suppliers are evaluated; geolocations and basic stand data are provided. Non-compliance increases the supplier's risk level and may add conditions. Additional investigations are triggered by: forests with old trees, heathland, valuable tree species, indications of high biodiversity and habitats, and young stands (after 2007).
2) Procurement check: verify legality and plausibility (location, rights, tree species, ownership type, supply chain, certification claims, biomass type). If possible, obtain evidence about forest type and age.
3) Online map and database review: the sustainability manager cross-checks supplier data, screens for biodiversity values, and reviews for identified areas with conservation value. If needed, documents are requested.
4) On-site verification (when needed): field inspections to clarify habitat type. Where the assessment leave doubts, sourcing areas are non-compliant.
Auditor evaluated the 4 steps describes above with desk review and on site visit on 10.06.2026 of the only supplier of primary material (state forest of Mecklenburg Vorpommern).

6.2 CB evaluation of specified risk indicators and mitigation measures

Country
Germany
Area/Sub-Scope
Germany
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
The SBE must consider the minimum performance level in the supply base, not the usual or average level. Law-enforcement structures exist, but capacity constraints limit the frequency of inspections. Small private owners are usually exempt from producing management plans and environmental impact assessments. In private forests, harvesting decisions could be shaped by economic considerations and limited specialist knowledge. Small private forest owners can be participating in PEFC group certification. An SBP benchmark of PEFC indicated that PEFC-certified forests may lack sufficient impact assessment.
Detailed description of a mitigation measure
Low risk for FSC certified areas. Specified risk for non-certified areas and PEFC certified private forests. Given the procedures applied in government forestry, government-owned and -managed PEFC-certified areas are assessed as low risk.

For uncertified forests and privately owned PEFC-certified forests, evidence is required that biodiversity values were identified and that the threats and impacts of harvesting were assessed before operations began (field inspections). This can include documental evidence that protected species and habitats were identified before harvesting and/or on-site evidence that operations were low-impact or unavoidable. For example, salvage operations in stands of low biodiversity value outside the nesting season are likely to be compliant.

Detailed description of CB evaluation of mitigation measure and its conclusions

Auditor evaluated origins included in the SBE scope.
Origin documentation and certification records were verified.
All origins are from state forest with PEFC FM Certificate. Benchmark between SBP and PEFC concludes the indicator is partially covered
Field visits conducted to a sample of compartments, HCV identification was evaluated.

Country

Germany

Area/Sub-Scope

Germany

Indicator

2.1.2 Threats to and impacts on the identified key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified and evaluated.

Specified risk description

Additional evidence is required that an assessment is made on the threats and possible impacts of the operations, covering protected species and other biodiversity values. See indicator above.

Detailed description of a mitigation measure

Low risk for FSC certified areas.
Specified risk for non-certified areas and PEFC certified private forests. Given the procedures applied in government forestry, government-owned and -managed PEFC-certified areas are assessed as low risk.
For uncertified forests and privately owned PEFC-certified forests, evidence is required that biodiversity values were identified and that the threats and impacts of harvesting were assessed before operations began (field inspections). This can include documental evidence and/or on-site evidence that operations were low-impact or unavoidable.
Low-grade wood used as biomass – including low-grade stemwood of low biodiversity value, thinnings from simplified or heavily degraded stands, low-grade salvage wood and forest wastes and residues typically comes from forest maintenance, salvage and sanitation operations that, when properly executed, support biodiversity conservation. The tree species, type of biomass, and management operation are considered in the risk mitigation process.

Detailed description of CB evaluation of mitigation measure and its conclusions

Auditor evaluated origins included in the SBE scope.
Origin documentation and certification records were verified.
All origins are from state forest with PEFC FM Certificate. Benchmark between SBP and PEFC concludes the indicator is partially covered
Field visits conducted to a sample of compartments, HCV identification and threats to species and HCV was evaluated. No impacts identified on site due to harvesting activities

Country
Germany
Area/Sub-Scope
Germany
Indicator
2.1.3 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.
Specified risk description
The SBE considers the minimum performance level in the supply base (not the usual or average level). Nearly half of Germany's forests are privately owned, often in small parcels; many small private owners are exempt from formal management planning. Often a harvesting permit is not required either. Advisory services and cooperatives provide support, but not all owners participate. Enforcement capacity is uneven between the regions, and inspections can be infrequent. NGOs report cases of violations, such as logging during the breeding season of protected species or inadequate consideration of sensitive habitats. Regarding both private and public forests, there can be tension between management objectives: either converting forests to increase resilience, or maintaining recognised HCV forest habitats (such as harvesting old beech forests).
Detailed description of a mitigation measure
Low risk for FSC Regarding uncertified forests, additional evidence is required that the area was managed in a way that respects protected species, biodiversity values, and HCV areas. This can include documental evidence and/or on-site evidence that operations were low-impact or unavoidable. Relevant are also the tree species sourced, the feedstock quality, and type of forest operation. Unlike the procurement of quality roundwood, procuring low-grade stemwood, salvage wood, and forest residues does not create an economic incentive to reduce the area and quality of the habitat types.
Detailed description of CB evaluation of mitigation measure and its conclusions
Auditor evaluated origins included in the SBE scope. Origin documentation and certification records were verified. All origins are from state forest with PEFC FM Certificate. Benchamark between SBP and PEFC concludes the indicator is fully covered. Field visits conducted to a sample of compartments, HCV idetification was evaluated.

Country

Germany
Area/Sub-Scope
Germany
Indicator
2.2.2 Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.
Specified risk description
Germany adjusted its approach to monocultures too late, and the consequences are now evident: extensive conifer stands have collapsed, salvage wood has dominated harvests, growing stock has fallen sharply, and net increment has declined. These outcomes were predicted, federal strategies warned for decades, and yet, to date, forest legislation and mandatory regulation remain behind. Many forests still have low resilience, for example planted monoculture spruce stands.
Detailed description of a mitigation measure
Low risk for FSC and PEFC certified areas. Sourcing low-grade wood and forest residues is an essential element in the way forward after many years of premature forest downfall. However, it is also needed that adaptation measures are implemented and forests with a significant resilience are cultivated. Regarding uncertified forests, the regeneration method will be investigated. Inadequate management plans will make the biomass non-compliant.
Detailed description of CB evaluation of mitigation measure and its conclusions
Auditor evaluated origins included in the SBE scope. Origin documentation and certification records were verified. All origins are from state forest with PEFC FM Certificate. Benchmark between SBP and PEFC concludes PEFC fully cover the indicator. Field visits conducted to a sample of compartments.

Country
Germany
Area/Sub-Scope
Germany
Indicator
2.2.11 The impacts of natural processes such as fires, pests and diseases shall be managed.
Specified risk description
See SBE indicator 2.2.2. Although Germany has a well-developed legal and institutional forest-protection system, it is nevertheless facing a forest health crisis driven by fires, pests, and diseases, because long-term management choices have not sufficiently reduced the risks. Forest resilience received insufficient attention
Detailed description of a mitigation measure
Low risk for FSC and PEFC certified areas.

For uncertified forests, management plans must explicitly consider natural-disturbance risks when selecting regeneration methods and planning the development of stand structure.

Detailed description of CB evaluation of mitigation measure and its conclusions

Auditor evaluated origins included in the SBE scope.
Origin documentation and certification records were verified.
All origins are from state forest with PEFC FM Certificate. Benchmark between SBP and PEFC concludes the indicator is partially covered
Field visits conducted to a sample of compartments, HCV identification was evaluated.

Country

Germany

Area/Sub-Scope

Germany

Indicator

3.3.1 Feedstock sourcing shall be in compliance with the principles of cascading use, high quality stem wood shall not be used as feedstock if it is in substantial demand for long-lived products in the Supply Base.

Specified risk description

Biomass end-users in both Germany and abroad participate in market instruments to promote renewable energy production. These instruments increase their purchasing power. The demand for biomass has coincided with high levels of salvage logging. Under these conditions, there is a risk that wood ends up as biomass what could have been used in a more sustainable manner (in long-lived products). The combination of non-binding cascading principles, significant market incentives, and crisis driven harvesting, results in classifying this indicator as Specified Risk. Given the strong growth of the processing and biomass sectors over the past decade, and the loss of stands in the 61–80-year age class (BWI), this issue is likely to become more pressing in the coming years. The use of biomass shall not create sourcing issues with wood processing facilities producing “long-lived” wood products.

Detailed description of a mitigation measure

Biomass procurement excludes quality roundwood (Stammholz) and avoids assortments where regional wood-processing companies have reported unresolved supply constraints. The specified risk is mitigated by using "Industrieholz" and low-grade assortments, preventing competition with regional processors, and monitoring market prices to avoid assortments showing price spikes.
LEAG commits to taking any concerns from regional wood processors seriously and to promptly discuss and address them.
Given Germany’s salvage operations with local oversupply, quality roundwood from salvage must be identified and offered to the processing industry. Only wood of reasonable quality that cannot be feasibly supplied due to oversupply and full storage capacity may be treated as SBP-compliant biomass.

Detailed description of CB evaluation of mitigation measure and its conclusions

Feedstock classification and cascading principle was evaluated on site during Forest

Management inspections. Logging site visits were conducted, interviews with responsible operators and raw material observations.
Auditor confirmed that only low grade material was sourced and used as SBP compliant biomass

Country
Germany
Area/Sub-Scope
Germany
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
German law does not ensure the unconditional exclusion of biomass from forests with high carbon stock and high conservation value. While some forests are left to natural development (without interventions), many such forests remain under a maintenance regime. Any biomass sourced from such forests is non-compliant. Forests that combine high carbon stock and high conservation value and Old-Growth-Forests are similar concepts. SBP does not mention heather or heathland in any of its standard, guidance documents, or normative interpretations, but it is also one of the EU RED unconditionally no-go areas.
Detailed description of a mitigation measure
Specified risk applies to the unconditional no-go areas, as defined more clearly in the EU RED, regardless of forest owner or certification status. The general steps for mitigating the specified risks of the SBE and EU RED Level B report are: 1) Supplier / initial information: suppliers are evaluated; geolocations and basic stand data are provided. Non-compliance increases the supplier's risk level and may add conditions. Additional investigations are triggered by: forests with old trees, heathland, valuable tree species, indications of high biodiversity and habitats, and young stands (after 2007). 2) Procurement check: verify legality and plausibility (location, rights, tree species, ownership type, supply chain, certification claims, biomass type). If possible, obtain evidence about forest type and age. 3) Online map and database review: the sustainability manager cross-checks supplier data, screens for biodiversity values, and reviews for identified areas with conservation value. If needed, documents are requested. 4) On-site verification (when needed): field inspections to clarify habitat type. Where the assessment leave doubts, sourcing areas are non-compliant.
Detailed description of CB evaluation of mitigation measure and its conclusions
Auditor evaluated implementation of points 1, 2 and 3 during office audit using documents and database reviews. Field visits were also conducted to a sample of forest origins where direct observations and interviews with foresters confirmed a good

understanding of the no-go areas and implementation of this specific requirement.