Supply Base Report:

Aktieselskabet Rold Skov Savværk A/S
Fourth Surveillance Audit

Sustainable Biomass Program
sbp-cert.org



Completed in accordance with the Supply Base Report Template Version 2.4 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 1.0	**Published 26 March 2015**
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1 Overview

Producer name:	Aktieselskabet Rold Skov Savværk A/S
Producer address:	Viborgvej 930, 8471 Sabro, Denmark
SBP Certificate Code:	SBP-05-23
Geographic position:	56.228400, 9.949900
Company website:	
Date report finalised:	29 Oct 2026
SBR reporting period from:	01 Jul 2025
SBR reporting period to:	30 Jun 2026
Name of the Certification Body:	DNV Business Assurance Finland Oy Ab
Certification Body Approval date:	
SBP Standard(s) used:	• SBP Standard 1: Feedstock Compliance v2.1, • SBP Standard 2: Feedstock Verification v2.1, • SBP Standard 4: Chain of Custody v2.1, • SBP Standard 5: Collection and Communication of Data v2.1, • SBP Instruction Document EU RED: Bridging Requirements for Meeting EU RED v2.0, • Instruction Document 5E: Collection and Communication of Energy and Carbon data v2.2
Weblink to Standard(s) used:	https://sbp-cert.org/standards-documents/

2 Description of the Biomass Producer and the Supply Base

2.1 Description of the company

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

Products included in the scope of SBP Certification: *WB 2.4 Other residues from wood processing*

Number of employees: *54*

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

Number of direct feedstock suppliers: *0*

Approximate number of feedstock sub-suppliers: *20*

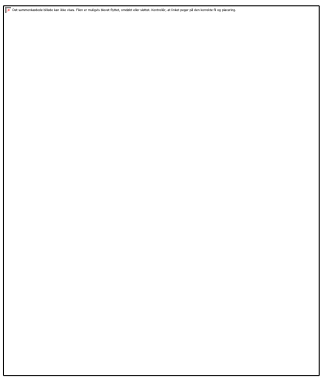
Subcontracting: *No*

Description of the subcontracted activities:

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

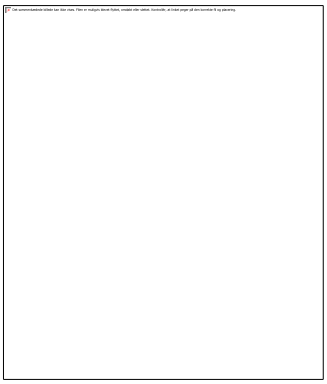
Rold Skov Savværk produces biomass from processing residues generated by our two sawmills only. Primary feedstock for the sawmills are sourced in Denmark and Norway EXW forest road. From Denmark Rold Skov Sawmill buys certified and not-certified wood. From Norway only wood that is PEFC and FSC CW is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

2.2 Detailed description of the Supply Base

Country	Norway
Sub-scope	Entire country
Exclusions	
Feedstock Category	Processing residues
Feedstock Product Groups	Processing residues feedstock (4A)
Feedstock Inputs	SBP Compliant feedstock
Risk assessment(s)	N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme
Includes EU RED SBE:	No
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	No
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	38.5000
Map(s) of the Supply Base area:	
	

Country	Denmark
Sub-scope	Entire Country
Exclusions	
Feedstock Category	Processing residues
Feedstock Product Groups	Processing residues feedstock (4A)
Feedstock Inputs	SBP Compliant feedstock
Risk assessment(s)	N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme, Regional Risk Assessment (RRA)
Includes EU RED SBE:	Yes

Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	No
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	4.3000
Map(s) of the Supply Base area:	



2.3 SBP Feedstock information

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

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

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

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

d.Share of SBP-recognised system claims feedstock:

Scheme	Feedstock Category	Percentage
FSC certified	Processing residues	15.00 %
PEFC certified	Processing residues	85.00 %

e. Is the forest managed to supply energy and non-energy markets? Yes - Minority

Explanation: Rold Skov Sawmill sources from coniferous plantation which mainly are managed for the production of sawlogs, the processing residues from these is a low value biproduct.

f. 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

Explanation: Regeneration normally takes place within 1-2 years after final felling, the Forest Act in Denmark requires regeneration within 10 years while the Forest Act in Norway requires necessary initiatives to restock within 3-5 years depending on location.

g. 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: Not relevant

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

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

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

k. Indicate how you determine the proportion of saw log: Specification used by the sawmill closest to where the wood was grown.

l. Roundwood from fellings from forests with > 40 yr rotation times - Average % volume of fellings delivered to BP (%): 50.00

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

n. Select the main harvesting system(s) used for the sourced primary feedstock: Mix of the above

o. Volume of primary feedstock from primary forest: 0

p. Volume of processing residues feedstock: 1-200,000 m3
Physical form of the feedstock: Chips, Sawdust, Other (specify)

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

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

s. **What is the estimated amount of EU RED-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated):** 16250000.00 m3

Explanation: DK, annual increment according to NFI: 7.4 mio m3 (2023) NO, annual increment according to NFI: 25.1 mio m3 (2025) TOTAL: 32.5 mio m3 Assuming 50% could be harvested this is: 16.25 mio m3

3 Risk Management Measures

Guidance: Biomass Producers shall demonstrate that any specified risks of sourcing feedstock not in compliance with SBP Standard 1 have been adequately reduced to low risk, following Standard 2 requirements. Following section applies to Biomass Producer's implementing SBP Supply Base Evaluation (SBP RRA or company own risk assessment). EU RED Supply Base Evaluation details are reported in Annex 2.

☐**Not Applicable – Supply Base Evaluation not implemented**

3.1 Summary of the Supply Base Evaluation

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

3.2 Conflicts with applicable national and sub-national legislation

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

3.3 Risk Management Measures

Guidance: Please provide more details about the specified risk indicators in each supply country and describe mitigation measures taken to address all specified risks associated with indicators.

Country: Denmark
Sub-scope: The entire country fredskov and non-fredskov
Regional Risk Assessment (RRA): SBP-RRA-EU-DK-FOR v2.1_Endorsed
Company Risk Assessment (CRA): **False**
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 are no complete and systematic mapping and registration of HCV 1 and HCV 3 in Denmark. According to the EU EIR 2025, Denmark's share of Natura 2000 area within its national territory is the smallest in the EU. Specifically in forests covered by the Forest Act, § 28 areas (small § 3-like nature types) are not mapped. § 25 areas (naturally particularly valuable forest) of at least 0.5 hectares are mapped, but areas below this size are not. Therefore, the risk that key species, habitats, and biodiversity-related areas of HCV (HCV1 and HCV3) are not identified and mapped in forests covered by the Forest Act is assessed as a **specified risk**. For forests not covered by the Forest Act, identification of HCV1 and HCV3 areas mandated by the Forest Act does not apply except for § 25, and forests smaller than 5 hectares have been excluded from § 25 registration. This leads to fewer HCVs being identified in these forests than in Forest Act forests, and to a **specified risk** that key species, habitats, and biodiversity-relevant areas of HCV have not yet been identified and mapped.

HCV 2 is not relevant in Denmark, and Danish authorities effectively identify essential ecosystem services; therefore, HCV 4 is assessed as **low risk**.

Mitigation measure:

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

In order to mitigate the risk and identify key biotopes the the following procedures are implemented:

SBP #3 FSC-PEFC deliveries from Denmark
Includes checklists of

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

SBP #4 non-certified deliveries from Danmark
Includes checklists of
A: Identification and protection of HCV´s (including highly biodiverse forest §25) and retention of deadwood

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

B: Harvesting level

- For non-fredskov only: forest manager checklist to prevent overharvesting

C: Clear-cut threshold

- For non-fredskov only: Field visit for clear-cut evaluation, justification for clear-cuts above 2 ha.

D. Deadwood:

- For private forests only: Specific deadwood measures are required according to forest type

E. No-go areas:

- OGF in protected areas except for coniferous plantations, documentation required that only coniferous species are sourced.

F. Statement of assurance

G. EUDR procedures and Traces use required when applicable.

Monitoring and outcomes:

Monitoring is carried out on a pending basis, and internal audit including audit report with non-conformances, corrective actions and follow up is conducted yearly ahead of external audit, - sampling frequency: 0,6 X Sqrt of number of deliveries (invoices).

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

Country: Denmark

Sub-scope: The entire country fredskov and non-fredskov

Regional Risk Assessment (RRA): SBP-RRA-EU-DK-FOR v2.1_Endorsed

Company Risk Assessment (CRA): **False**

Indicator with specified risk:

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

Description of the specific risk:

In Denmark, threats to, and impacts on, identified key species, habitats, ecosystems, and HCV areas are not consistently identified and evaluated at the scale required to demonstrate low risk of non-conformance. Available descriptions of pressures are largely generic and do not, for most
HCV-relevant forest nature types/areas, provide an operationally explicit evaluation of how common forest management activities can undermine the identified values (harvesting compatibility). As a result, the evidence base is insufficient to justify low risk, and the indicator is designated **specified risk**.

Mitigation measure:

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In order to mitigate the risk and identify key biotopes the the following procedures are implemented:

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C: Clear-cut threshold

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Country: Denmark

Sub-scope: The entire country fredskov and non-fredskov
Regional Risk Assessment (RRA): SBP-RRA-EU-DK-FOR v2.1_Endorsed
Company Risk Assessment (CRA): False
Indicator with specified risk:
3.2.3 Primary feedstock shall not be sourced from primary forest, old-growth forests, heathland forming a climax stage or natural highly biodiverse grassland.
Description of the specific risk:
In Denmark, Primary Forest hardly exists, although two small forests—Draved and Suserup— resemble primary forest. As these are strictly protected, **low risk** is concluded for Primary Forest. Old Growth Forest is formally defined but has not been identified or mapped nationwide. Input from stakeholders confirm that, though very limited amounts, patches of OGF exist in Danish forests, most likely within protected areas, but it is unlikely to be found within coniferous forest. The Danish Energy Agency stated in 2025 that Primary and Old Growth Forests are not generally protected. On this basis, a **specified risk** is concluded for sourcing primary feedstock from Old Growth Forest within protected areas, except for areas of coniferous forest. Most heathlands in Denmark will naturally overgrow with trees if left unmanaged, so they cannot be considered natural climax-stage heathlands. Only dune heath on the West Coast is considered natural heathland, but even in these, it can be necessary to harvest trees to conserve the natural type. For this reason, **low risk** of sourcing primary feedstock from heathland at the climax stage is concluded. Danish grasslands—including meadows, grasslands, and salt meadows—depend on continuous grazing or mowing to remain open. Without such management, they overgrow and thus do not qualify as natural, highly biodiverse grasslands. **Low risk** of sourcing primary feedstock from natural, highly biodiverse grasslands is concluded. Specified risk for primary and old-growth forest, low risk for heathland forming a climax stage and a natural highly biodiverse grassland.
Mitigation measure:
Rold Skov Savværk's Standard Operating Procedures are all based on the sawmills only sourcing and processing coniferous tree species mainly grown in monocultural plantations. In order to mitigate the risk and identify key biotopes the the following procedures are implemented: **SBP #3 FSC-PEFC deliveries from Denmark** Includes checklists of • Valid certificates, contracts, supplier documentation for said claims. • Valid FSC/PEFC Coc certificate. • Accepted claims: 100% PEFC or FSC 100% or FSC mix credit • No SBE required **SBP #4 non-certified deliveries from Danmark** Includes checklists of A: Identification and protection of HCV´s (including highly biodiverse forest §25) and retention of deadwood

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- Rold Skov Savværk project screening with HCV protection (+ control of thresholds for clearcuts and retention of deadwood, protection of no-go areas) or
- Wood originates from coniferous plantation (screening of area included in documentation) .

B: Harvesting level

- For non-fredskov only: forest manager checklist to prevent overharvesting

C: Clear-cut threshold

- For non-fredskov only: Field visit for clear-cut evaluation, justification for clear-cuts above 2 ha.

D. Deadwood:

- For private forests only: Specific deadwood measures are required according to forest type

E. No-go areas:

- OGF in protected areas except for coniferous plantations, documentation required that only coniferous species are sourced.

F. Statement of assurance

G. EUDR procedures and Traces use required when applicable.

Monitoring and outcomes:

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Country: Denmark

Sub-scope: The entire country fredskov and non-fredskov
Regional Risk Assessment (RRA): SBP-RRA-EU-DK-FOR v2.1_Endorsed
Company Risk Assessment (CRA): False
Indicator with specified risk:
2.1.3 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.
Description of the specific risk:
Official assessments show a continued deterioration in species conservation status in Denmark (HCV 1), with Danish Red List comparisons indicating that more species are declining than improving, and EU evaluations likewise reporting an increasing share of species in poor or bad conservation status. For habitats (HCV 3), Denmark protects biodiversity through Natura 2000 sites, national parks, nature national parks, and §§ 3 and 33-protected areas and untouched forests, all of which offer varying degrees of legal protection. In contrast, Forest Act §§ 27–28 protections apply only within forests covered by the Forest Act, leaving equivalent HCV areas in the remaining forests unprotected. Protection of Forest Act § 25 areas remain voluntary in all forests. Danish authorities highlight that many species' habitats are shrinking, disappearing, or being disturbed due to land-use change. The EU's 2025 EIR further reports that all nine forest habitat types protected under the Habitats Directive in Denmark are assessed as having unfavourable-bad conservation status, underscoring the significant pressures facing HCV forest areas. **Specified risk** is concluded for the maintenance or enhancement of key species, habitats, ecosystems, and HCV areas (HCV 1 and HCV 3).
Mitigation measure:
Rold Skov Savværk's Standard Operating Procedures are all based on the sawmills only sourcing and processing coniferous tree species mainly grown in monocultural plantations. In order to mitigate the risk and identify key biotopes the the following procedures are implemented: **SBP #3 FSC-PEFC deliveries from Denmark** Includes checklists of • Valid certificates, contracts, supplier documentation for said claims. • Valid FSC/PEFC Coc certificate. • Accepted claims: 100% PEFC or FSC 100% or FSC mix credit • No SBE required **SBP #4 non-certified deliveries from Danmark** Includes checklists of A: Identification and protection of HCV´s (including highly biodiverse forest §25) and retention of deadwood • Valid FSC CW certificates, contracts, supplier documentation for said claims, (screening of area included in documentation) or • WSP or RBP evaluations, contracts, supplier documentation for said claims (screening of area included in documentation) , or • Green Management Plan with HCV protection, or • Rold Skov Savværk project screening with HCV protection (+ control of thresholds for clearcuts and retention of deadwood, protection of no-go areas) or

- Wood originates from coniferous plantation (screening of area included in documentation) .

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Country: Denmark

Sub-scope: The entire country fredskov and non-fredskov

Regional Risk Assessment (RRA): SBP-RRA-EU-DK-FOR v2.1_Endorsed

Company Risk Assessment (CRA): False

Indicator with specified risk:

2.2.9 Harvesting levels shall be justified as to how they can be sustained with reference to inventory and growth data for the Supply Base.

Description of the specific risk:
The requirement for sustainable harvesting levels is covered by national legislation for forests under the Forest Act, and the standing volume of Danish forests has increased over the past decade; therefore, the risk of unsustainable feedstock harvesting levels is assessed as **low risk** for forests under the Forest Act. Only the Handbook sets requirements for sustainable harvesting levels for forests not covered by the Forest Act, and these apply only to energy producers with a capacity above 2.5 MW. Because there are no direct requirements at the forest level concerning the harvesting levels in forests not covered by the Forest Act, and since forest management plans are not mandatory, the risk of unsustainable harvesting levels is assessed as **specified risk** for forests not covered by the Forest Act.
Mitigation measure:
Rold Skov Savværk's Standard Operating Procedures are all based on the sawmills only sourcing and processing coniferous tree species mainly grown in monocultural plantations. In order to mitigate the risk and identify key biotopes the the following procedures are implemented: **SBP #3 FSC-PEFC deliveries from Denmark** Includes checklists of • Valid certificates, contracts, supplier documentation for said claims. • Valid FSC/PEFC Coc certificate. • Accepted claims: 100% PEFC or FSC 100% or FSC mix credit • No SBE required **SBP #4 non-certified deliveries from Danmark** Includes checklists of A: Identification and protection of HCV´s (including highly biodiverse forest §25) and retention of deadwood • Valid FSC CW certificates, contracts, supplier documentation for said claims, (screening of area included in documentation) or • WSP or RBP evaluations, contracts, supplier documentation for said claims (screening of area included in documentation) , or • Green Management Plan with HCV protection, or • Rold Skov Savværk project screening with HCV protection (+ control of thresholds for clearcuts and retention of deadwood, protection of no-go areas) or • Wood originates from coniferous plantation (screening of area included in documentation) . B: Harvesting level • For non-fredskov only: forest manager checklist to prevent overharvesting C: Clear-cut threshold • For non-fredskov only: Field visit for clear-cut evaluation, justification for clear-cuts above 2 ha.

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Further:
Once a year, forest statistics on growth trends in Danish forests must be checked for the most recent five-year period. The regions in Denmark that supply Rold Skov Sawmill must be examined.
The latest available statistics can be found here:Up to 2023: https://ign.ku.dk/samarbejde-med-ign/forskningsbaseret-raadgivning/skovovervaagning/danmarks-skovstatistik/From 2024 onward: https://mst.dk/nyheder/2024/marts/aendret-organisering-af-skovovervaagningen
If a negative trend is observed, Rold Forest will not receive timber from forests that are not subject to forest protection obligations.
Additonally the following procedure apply:
Procedure #7 replanting agreement
Replanting, only relevant for clearfell operations

- Fredskovspligt (Forest covered by the Forest Ac t) (replanting is law enforced) or
- Non-fredskovspligt: Forest owner, sign a replanting agreement.

Monitoring and outcomes:

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Country: Denmark
Sub-scope: The entire country fredskov and non-fredskov
Regional Risk Assessment (RRA): SBP-RRA-EU-DK-FOR v2.1_Endorsed
Company Risk Assessment (CRA): False
Indicator with specified risk:

2.2.10 Harvested areas shall be regenerated
Description of the specific risk:
Forests covered by the Forest Act must be regenerated under Danish forest law and are therefore assessed as having a **low risk** of non-compliance with the regeneration requirement. Forests not covered by the Forest Act are not legally obligated to regenerate. Only the Handbook sets regeneration requirements for forests not covered by the Forest Act. However, the Handbook is required for end users, not for forest owners or biomass producers. Because there are no direct requirements at the forest level for regeneration in forests not covered by the Forest Act and since local experts flag recurring compliance issues, a **specified risk** is assessed that harvested areas are not regenerated.
Mitigation measure:
Rold Skov Savværk's Standard Operating Procedures are all based on the sawmills only sourcing and processing coniferous tree species mainly grown in monocultural plantations. In order to mitigate the risk and identify key biotopes the the following procedures are implemented: **SBP #3 FSC-PEFC deliveries from Denmark** Includes checklists of • Valid certificates, contracts, supplier documentation for said claims. • Valid FSC/PEFC Coc certificate. • Accepted claims: 100% PEFC or FSC 100% or FSC mix credit • No SBE required **Procedure #7 replanting agreement** Replanting, only relevant for clearfell operations • Fredskovspligt (Forest covered by the Forest Ac t) (replanting is law enforced) or • Non-fredskovspligt: Forest owner, sign a replanting agreement.
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Monitoring is carried out on a pending basis, and internal audit including audit report with non-conformances, corrective actions and follow up is conducted yearly ahead of external audit, - sampling frequency: 0,6 X Sqrt of number of deliveries (invoices). Rold Skov Savværk conducts yearly monitoring of forest NFI for development of increment in Danish forests for 5 year periods. All Danish regions from where Rold Skov Savværk sources are checked. If a negative development is found Rold Skov Savværk will only accept wood from forests covered by the Forest Act.

Country: Denmark
Sub-scope: Forests not covered by the Forest Act
Regional Risk Assessment (RRA): SBP-RRA-EU-DK-FOR v2.1_Endorsed
Company Risk Assessment (CRA): False
Indicator with specified risk:

2.2.13 Harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located.

Description of the specific risk:

No legislation sets quantitative maximum thresholds for large clear-cuts in any Danish forests, and the Forest Act's qualitative requirements apply only to forests covered by the Forest Act (fredskov). The Handbook imposes qualitative clear-cut requirements on biomass end-users, but the Energy Agency has, in their evaluation, Fulfilment of sustainability requirements for biomass from Danish forests (20.05.2025), concluded that the REDIII criteria 29.6(iv), including the requirement of maximum thresholds for large clear-cuts, is not fulfilled by national legislation, and that a control system at the sourcing area level is needed, recognising FSC and PEFC as suitable documentation.

For forests covered by the Forest Act, legislation sets qualitative clear-cut thresholds that require clear-cutting to be avoided as much as possible, and stakeholders argue that their compliance ensures clear-cutting does not threaten forest climate or regeneration. On this basis, **low risk** is concluded for forests covered by the Forest Act.

For forests not covered by the Forest Act (private forests), clear-cutting is still widely practised, and no forest-level legislation regarding clear-cutting applies. Therefore, based on the Energy Agency conclusion that a control system at the sourcing area level is needed, a **specified risk** of non-compliance with maximum clear-cut thresholds is assessed for private forests not covered by the Forest Act.

Mitigation measure:

Rold Skov Savværk's Standard Operating Procedures are all based on the sawmills only sourcing and processing coniferous tree species mainly grown in monocultural plantations.
In order to mitigate the risk and identify key biotopes the the following procedures are implemented:

SBP #3 FSC-PEFC deliveries from Denmark
Includes checklists of

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

SBP #4 non-certified deliveries from Danmark
Includes checklists of
A: Identification and protection of HCV´s (including highly biodiverse forest §25) and retention of deadwood

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

B: Harvesting level

- For non-fredskov only: forest manager checklist to prevent overharvesting

C: Clear-cut threshold

- For non-fredskov only: Field visit for clear-cut evaluation, justification for clear-cuts above 2 ha.

D. Deadwood:

- For private forests only: Specific deadwood measures are required according to forest type

E. No-go areas:

- OGF in protected areas except for coniferous plantations, documentation required that only coniferous species are sourced.

F. Statement of assurance

G. EUDR procedures and Traces use required when applicable.

Monitoring and outcomes:

Monitoring is carried out on a pending basis, and internal audit including audit report with non-conformances, corrective actions and follow up is conducted yearly ahead of external audit, - sampling frequency: 0,6 X Sqrt of number of deliveries (invoices).

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

Country: Denmark

Sub-scope: Entire country fredskov and non-fredskov

Regional Risk Assessment (RRA): SBP-RRA-EU-DK-FOR v2.1_Endorsed

Company Risk Assessment (CRA): False

Indicator with specified risk:

2.2.14 Harvesting is carried out in compliance with locally and ecologically appropriate retention thresholds for deadwood extraction.

Description of the specific risk:

Danish law does not define retention thresholds for deadwood in forests, but the Sustainability Order for biomass requires that, during harvesting, ecologically appropriate amounts of deadwood are left. In their evaluation, Fulfilment of sustainability requirements for biomass from Danish forests (20.05.2025), the Energy Agency concluded that the REDIII criteria 29.6(iv), including the requirement for deadwood retention, is not fulfilled by national legislation, and that a control system at the sourcing area level is needed. Certification schemes such as FSC and PEFC—recognised by the Danish Energy Agency as valid documentation for meeting EU sustainability requirements—set more explicit rules for deadwood retention, and overall deadwood amounts have increased from 2005 to 2023. But according to the Danish NFI 2023, the average deadwood (standing/leaning/lying) level for all of Denmark was 6,4 m3 per hectare, while according to Forest Europe, for EU-27 countries the weighted average total deadwood volume was 13,4 m^3 per ha (2020). The same report singles out Denmark as one of only four countries in Europe with a share of deadwood relative to growing-stock volume below 3%. State forests (covered by the Forest Act) are FSC and PEFC certified and follow nature-near management practices that actively increase deadwood. According to the Danish National Forest Inventory (2023), unmanaged and uneven-aged forests have much higher deadwood volumes (14.3 and 11.7 m^3/ha) than even-aged,
planted forests. Therefore, a **low risk** of non-compliance with locally and ecologically appropriate retention thresholds for deadwood extraction is concluded for the **state forest**.
Private forests (covered and not covered by the Forest Act), however, remain largely even-aged and traditionally managed. According to the Danish National Forest Inventory (2023), deadwood volume in even-aged, planted forests is 5.7 m^3/ha. Based on the Energy Agency conclusion of the need of a control system at the sourcing area level, and on the amount of dead wood, which, compared to most other European countries, is low, **specified risk** of non-compliance with locally and ecologically appropriate retention thresholds for deadwood extraction is identified in **private forests**, especially even-aged forest stands.

Mitigation measure:

Rold Skov Savværk's Standard Operating Procedures are all based on the sawmills only sourcing and processing coniferous tree species mainly grown in monocultural plantations.
In order to mitigate the risk and identify key biotopes the the following procedures are implemented:

SBP #3 FSC-PEFC deliveries from Denmark
Includes checklists of

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

SBP #4 non-certified deliveries from Danmark
Includes checklists of
A: Identification and protection of HCV´s (including highly biodiverse forest §25) and retention of deadwood

- Valid FSC CW certificates, contracts, supplier documentation for said claims, (screening of area included in documentation) or
- WSP or RBP evaluations, contracts, supplier documentation for said claims (screening of area included in documentation) , or
- Green Management Plan with HCV protection, or

- Rold Skov Savværk project screening with HCV protection (+ control of thresholds for clearcuts and retention of deadwood, protection of no-go areas) or
- Wood originates from coniferous plantation (screening of area included in documentation) .

B: Harvesting level

- For non-fredskov only: forest manager checklist to prevent overharvesting

C: Clear-cut threshold

- For non-fredskov only: Field visit for clear-cut evaluation, justification for clear-cuts above 2 ha.

D. Deadwood:

- For private forests only: Specific deadwood measures are required according to forest type

E. No-go areas:

- OGF in protected areas except for coniferous plantations, documentation required that only coniferous species are sourced.

F. Statement of assurance

G. EUDR procedures and Traces use required when applicable.

Monitoring and outcomes:

Monitoring is carried out on a pending basis, and internal audit including audit report with non-conformances, corrective actions and follow up is conducted yearly ahead of external audit, - sampling frequency: 0,6 X Sqrt of number of deliveries (invoices).

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

Country: Denmark

Sub-scope: Entire country fredskov and non-fredskov

Regional Risk Assessment (RRA): SBP-RRA-EU-DK-FOR v2.1_Endorsed

Company Risk Assessment (CRA): False

Indicator with specified risk:

3.2.4 Primary feedstock may be sourced from highly biodiverse forests, peatlands, wetlands, or non-natural highly biodiverse grasslands only when evidence demonstrates that sourcing does not risk diminishing the conservation values.
Description of the specific risk:
Highly biodiverse forests – Specified risk in § 25 areas Areas considered to contain highly biodiverse forest — except for § 25 areas that underpin the specified risk conclusion in 2.1.3 — benefit from varying levels of protection, and low risk of primary feedstock sourcing diminishing the conservation values is concluded for these. Forest Act §25 areas are classified as “Forest of special natural value - Section 25 forest” and considered to be highly biodiverse forests. Protection of Forest Act § 25 areas remains voluntary in all forests; therefore, **specified risk** is concluded for these in both forests covered and not covered by the Forest Act. Peatlands, wetlands and non-natural highly biodiverse grasslands – Low risk The felling of overgrown trees is an important part of the conservation and restoration management of Danish peatlands, wetlands, and non-natural, highly biodiverse grasslands. Therefore, the risk of primary feedstock sourcing diminishing the nature values in these areas is assessed as **low risk**.
Mitigation measure:
Rold Skov Savværk's Standard Operating Procedures are all based on the sawmills only sourcing and processing coniferous tree species mainly grown in monocultural plantations. In order to mitigate the risk and identify key biotopes the the following procedures are implemented: **SBP #3 FSC-PEFC deliveries from Denmark** Includes checklists of • Valid certificates, contracts, supplier documentation for said claims. • Valid FSC/PEFC Coc certificate. • Accepted claims: 100% PEFC or FSC 100% or FSC mix credit • No SBE required **SBP #4 non-certified deliveries from Danmark** Includes checklists of A: Identification and protection of HCV´s (including highly biodiverse forest §25) and retention of deadwood • Valid FSC CW certificates, contracts, supplier documentation for said claims, (screening of area included in documentation) or • WSP or RBP evaluations, contracts, supplier documentation for said claims (screening of area included in documentation) , or • Green Management Plan with HCV protection, or • Rold Skov Savværk project screening with HCV protection (+ control of thresholds for clearcuts and retention of deadwood, protection of no-go areas) or • Wood originates from coniferous plantation (screening of area included in documentation) . B: Harvesting level

- For non-fredskov only: forest manager checklist to prevent overharvesting

C: Clear-cut threshold

- For non-fredskov only: Field visit for clear-cut evaluation, justification for clear-cuts above 2 ha.

D. Deadwood:

- For private forests only: Specific deadwood measures are required according to forest type

E. No-go areas:

- OGF in protected areas except for coniferous plantations, documentation required that only coniferous species are sourced.

F. Statement of assurance

G. EUDR procedures and Traces use required when applicable.

Monitoring and outcomes:

Monitoring is carried out on a pending basis, and internal audit including audit report with non-conformances, corrective actions and follow up is conducted yearly ahead of external audit, - sampling frequency: 0,6 X Sqrt of number of deliveries (invoices).

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

4 Stakeholder engagement

4.1 General description

Biomass Producer's stakeholder engagement start date: 04 Sep 2025
Biomass Producer's stakeholder engagement end date: 04 Oct 2025
Total number of stakeholders contacted: 19
Give a general description of the process of Stakeholders Engagement, including stakeholders contacted, method of communication and a summary of the comments received:

Stakeholder engagement letters were sent to 19 stakeholders listed on the Rold Skov Savværk Stakeholder list. The letter informed on the process of Rold Skov Savværk updating procedures for SBP V2 and on SBP in general. Stakeholders were encouraged to provide input to attached company mitigation measures and means of verification for identified risks relating to biomass sourcing. One stakeholder reply was received.
Rold Skov Savværk has a Stakeholder Engagement Plan, which is described in the SBP Management Procedures, indicating that the company is open for stakeholder inputs.

4.2 Response to stakeholder comments

Stakeholder description: AN Energi, CHP
Stakeholder comment: Risk mitigation measures and means of verification looks good, Subject to the verifier's approval, I have no comments.
Response to the stakeholder: Thank you, comments well received.

5 Report updates and approval

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

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

Name	Benno Laursen
Title	Management representative
Date of report approval	29 Oct 2026

Annex 1: Detailed Company Risk Assessment (CRA) findings

Note: Detailed findings for the Company Risk Assessment (CRA) can be retrieved from the Certificate Holder upon request. The specified risks identified and the risk management plan can be accessed from section 3.3 of this report.

Annex 2: EU RED Supply Base Evaluation

Countries where EU RED Supply Base Evaluation is used	
Country	Denmark
Area	Entire Country
Level A Risk Assessment	SBP-RED-EU-DK-FOR v1.2

(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 B management system at the level of the forest sourcing area	N/A
(ii) Forest regeneration of harvested areas	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level B management system at the level of the forest sourcing area	Level A is assessed by "SBP-RED-EU-DK-FOR_v1.2 RED level A for Denmark Forest" for forests covered by the Danish Forest Act Level B is assessed for forests not covered by the Danish Forest Act. Rold Skov Savværk has implemented Standard Operating Procedures including a replanting agreement to be signed by owners of forests not covered by the Forest Act. For RBP and WSP: All EU RED criteria are covered by these management systems and assured in different ways. Rold Skov requires compliance documentation to be available for each delivery and monitors the compliance on a pending basis.
(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grasslands, heathland and peatlands, are protected with the aim of preserving biodiversity and preventing habitat destruction, unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level B management system at the level of the forest sourcing area	N/A
(iv) that harvesting is carried out considering the maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth forests as defined in the country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located, and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with requirements to use logging systems	

that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and habitats	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level B management system at the level of the forest sourcing area	According to the REDIII level A risk assessment SBP-RED-EU-DK-FOR_v1.2 the following parts of the criteria are assessed with level B: • Harvesting of stumps and roots • Primary and Old-growth forest • Maximum thresholds for large clear-cuts • Retention thresholds for deadwood extraction Rold Skov Savværk has implemented Standard Operating Procedures and monitoring for the supplying forests for the harvesting of stumps and roots, Primary and OGF protection, maximum thresholds for large clear-cuts and for the retention of deadwood. Areas gets screened according to the biomass producers checklists. For RBP and WSP: All EU RED criteria are covered by these management systems and assured in different ways. Rold Skov requires compliance documentation to be available for each delivery and monitors the compliance on a pending basis. Signed and enforced contracts securing no harvesting of stumps and roots, maximum thresholds for clearcuts, retention of deadwood and protection of no-go areas (primary forests and old growth forests) are maintained as well as Statements of assurance.
(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 B management system at the level of the forest sourcing area	Level A is assessed by "SBP-RED-EU-DK-FOR_v1.2 RED level A for Denmark Forest" for forests covered by the Danish Forest Act Level B is assessed for forests not covered by the Danish Forest Act. Rold Skov Savværk has implemented Standard Operating Procedures for monitoring for the long-term production capacity for supplying forests. Rold Skov monitores annually regional increment, if increment is negative, no sourcing takes place from forests not covered by the Forest Act. For RBP and WSP: All EU RED criteria are covered by these management systems and assured in different ways. Rold Skov requires compliance documentation to be available for each delivery and monitors the compliance on a quarterly basis.
(vi)[1] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. ***Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:***	

*(a) **primary forest** and other wooded land and **old growth forest,** namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located. If there is no definition of **old growth forest** at the national level, then the following definition shall apply: A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.*	
Type of Risk Assessment used	☐Level A – proof at national or sub-national level ☒Level B – management system at forest sourcing area level
Level B management system at the level of the forest sourcing area	Level B is assessed by "SBP-RED-EU-DK-FOR_v1.2 RED level A for Denmark Forest" for forests covered and forests not covered by the Danish Forest Act. Signed and enforced contracts securing protection of no-go areas (primary forests and old growth forests) are maintained as well as Statements of assurance. For RBP and WSP: All EU RED criteria are covered by these management systems and assured in different ways. Rold Skov requires compliance documentation to be available for each delivery and monitors the compliance on a quarterly basis.
(vi)[2] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. ***Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:*** *(b) **highly biodiverse forest** and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.*	
Type of Risk Assessment used	☐Level A – proof at national or sub-national level ☒Level B – management system at forest sourcing area level
Level B management system at the level of the forest sourcing area	Level B is assessed by "SBP-RED-EU-DK-FOR_v1.2 RED level A for Denmark Forest" for forests covered and forests not covered by the Danish Forest Act. Rold Skov Savværk has implemented Standard Operating Procedures and monitoring for uncertified forests including Green Management Plans or Project screening. This is part of the biomass producers checklist. For RBP and WSP: All EU RED criteria are covered by these management systems and assured in different ways. Rold Skov requires compliance documentation to be available for each delivery and monitors the compliance on a quarterly basis.
(vi)[3] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. ***Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:***	

*(d) **highly biodiverse grassland** spanning more than one hectare that is: (i) natural, namely grassland that would remain grassland in the absence of human intervention and that maintains the natural species composition and ecological characteristics and processes; or (ii) non-natural, namely grassland that would cease to be grassland in the absence of human intervention and that is species-rich and not degraded and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the harvesting of the raw material is necessary to preserve its status as highly biodiverse grassland.*	
Type of Risk Assessment used	☒Level A – proof at national or sub-national level ☐Level B – management system at forest sourcing area level
Level B management system at the level of the forest sourcing area	N/A
(vi)[4] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. ***Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:*** *(e) **heathland** - Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).*	
Type of Risk Assessment used	☐Level A – proof at national or sub-national level ☒Level B – management system at forest sourcing area level
Level B management system at the level of the forest sourcing area	Level B is assessed by "SBP-RED-EU-DK-FOR_v1.2 RED level A for Denmark Forest" for forests covered and forests not covered by the Danish Forest Act. Rold Skov Savværk has implemented Standard Operating Procedures and monitoring to ensure that biomass shall not (no-go), originate from climax state heathland. This is part of the biomass producers checklist including supplier declaration and monitoring system. Input from no-go areas is not accepted in any way. For RBP and WSP: All EU RED criteria are covered by these management systems and assured in different ways. Rold Skov requires compliance documentation to be available for each delivery and monitors the compliance on a quarterly basis.
(vi)[5] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. ***Article 29 (4): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:*** *(a) **wetlands,** namely land that is covered with or saturated by water permanently or for a significant part of the year (NOTE: Evidence of verification of wetlands should reflect seasonal changes within a year).*	

Type of Risk Assessment used	☒Level A – proof at national or sub-national level ☐Level B – management system at forest sourcing area level
Level B management system at the level of the forest sourcing area	N/A
(vi)[6] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. *Article 29 (5): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was **peatland** in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.*	
Type of Risk Assessment used	☒Level A – proof at national or sub-national level ☐Level B – management system at forest sourcing area level
Level B management system at the level of the forest sourcing area	N/A

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 B management system at the level of the forest sourcing area	N/A

Annex 2a: EU RED II Supply Base Evaluation

Not Applicable (RED II SBE not included)

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

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

3.1.1 Verification and monitoring of suppliers

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

3.1.2 Feedstock inspection and classification upon receipt

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

3.1.3Supplier audit for processing residues and post-consumer feedstock

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

Annex 4: EU RED detailed findings for Trees Outside Forest (TOF) feedstock

NOTE: For "Trees outside forests (TOF) – Urban and landscape feedstock" no EU RED sustainability requirements apply, only the GHG savings criteria apply (SBP EU RED Bridging ID v2.0 Section 1.1). The land use category in this case is neither forest land nor agricultural land. For "Trees outside forests (TOF) – Agricultural land feedstock" the applicable criteria are Article 29 paragraphs (2)-(5).

Not Applicable (RED II TOF not included)

Annex 4a: RED II detailed findings for Trees Outside Forest (TOF) feedstock

NOTE: For "Trees outside forests (TOF) – Urban and landscape feedstock" no REDII sustainability requirements apply, only the GHG savings criteria apply (SBP REDII Bridging ID Section 4.2). The land use category in this case is neither forest land nor agricultural land. For "Trees outside forests (TOF) – Agricultural land feedstock" the applicable criteria are Article 29 paragraphs (2)-(5).

Not Applicable (RED II TOF not included)