



Supply Base Report:

Moelven Pellets AS First Surveillance Audit

Sustainable Biomass Program
sbp-cert.org



Completed in accordance with the Supply Base Report Template Version 2.2 and SBP Bridging Requirements for Meeting the Directive EU/2023/2413 (REDIII)

For further information on the SBP Framework and to view the full set of documentation see www.sbp-cert.org

Document history

Version 1.0	Published 26 March 2015
Version 2.0	Published 10 August 2023
Version 2.1	Published 15 April 2024
Version 2.2	Published 21 May 2025
Version 2.3	Published 14 August 2025

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Table of contents

1 Overview

2 Description of the Biomass Producer and the Supply Base

- 2.1 Description of the company
- 2.2 Detailed description of the Supply Base
- 2.3 Feedstock information

3 Supply Base Risk Assessments and Risk Management Measures

- 3.1 Summary of the Supply Base Evaluation
- 3.2 Conflicts with applicable national and sub-national legislation
- 3.3 Risk Management Measures

4 Stakeholder engagement

- 4.1 General description
- 4.2 Response to stakeholder comments

5 Report updates and approval

Annex 1: Detailed findings for Supply Base Evaluation indicators

Annex 2: EU RED Supply Base Evaluation

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

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

1 Overview

Producer name:	Moelven Pellets AS
Producer address:	Nordmoveien 60 , 3534 Sokna, Norway
SBP Certificate Code:	SBP-06-38
Geographic position:	60.242400, 9.955600
Primary contact:	Margot Øverbø, +47 470 20 417, Margot.Overbo@moelven.no
Company website:	moelven.com/no/om-moelven/moelven-pellets/
Date report finalised:	25 Nov 2025
SBR reporting period from:	01 Jan 2025
SBR reporting period to:	31 Dec 2025
Name of the Certification Body:	Control Union Certifications BV
Certification Body Approval date:	26 Nov 2025
SBP Standard(s) used:	SBP Standard 2: Feedstock Verification v2.0, SBP Standard 4: Chain of Custody v2.0, SBP Standard 5: Collection and Communication of Data v2.0, Instruction Document 5E: Collection and Communication of Energy and Carbon data. v2.1, Instruction Document EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413 v2.0
Feedstock origin (countries)	Norway (North up til, and including, Nordland), Sweden (Dalarna, Värmland, Bohusdal, Örebro Skaraborg)
Weblink to Standard(s) used:	https://sbp-cert.org/documents/standards-documents/standards

2 Description of the Biomass Producer and the Supply Base

2.1 Description of the company

Moelven Pellet

Moelven Pellets AS produces wooden pellets from woodworking residues of fourteen sawmills. The annual production volume is 80 000 tons of wood pellets. These residues for pellet production consists of sawdust, shavings and chips of Norway spruce (*Picea abies*) and Scots pine (*Pinus sylvestris*). All volumes are procured with an FSC and/or PEFC certification claim (SBP Compliant).

Moelven Pellets AS uses residues from the following sawmill within the Moelven Group: Moelven Soknabruket AS, Moelven Numedal AS, Moelven Van Severen AS, Moelven Granvin Bruk AS, Moelven Våler AS, Moelven Trysil As, Moelven Østerdalsbruket AS, Moelven Løten AS and Moelven Mjøsbruket AS. In addition Moelven Pellets AS uses residues from the group-external sawmills Begna Bruk AS, Telemarksbruket AS, Bergene Holm Haslestad, Bergene Holm Nidarp and Bergene Holm Larvik.

All sawmill within the Moelven Pellets supply base uses locally harvested sawlogs. The residues from the production of a saw log (100%) in Norway is typically 25% pulp chips and 20% sawdust & shavings.

The Norwegian forest

In total 44% of Norway's land area, or about 140000 km² is covered by forests or wooded land. There is approximately 86 000 km² of productive forest area in Norway.

Standing volume has been double since 1925 and the harvesting is less than the increment every year. One fourth of Norwegian land area is productive forest. In 2016, the total stock in Norwegian forests is 952 million cubic meters, and over the last ten years the volume has grown 25 per cent. The annual increment was almost 26 million cubic meters. In productive forest, the annual increment amounted to 23.8 million cubic meters; of which 18.5 million cubic meters are in conifer forest. In 2015, the forest owners cut 10.2 million cubic meters industrial roundwood for sale. In addition, 2.5 million cubic meters fire wood was used by the households. In total, forest owners invested NOK 372 million in silviculture and forest roads. In 2014, almost 16 000 persons were employed in Norwegian paper mills, sawmills and woodworking industry.

In 2023 there was harvesting 11,6 million cubic meters industrial roundwood for sale. About 4,8 % was bioenergy, 41,4 % was pulpwood and 53,3 % was Saw wood.

Norway spruce (44 per cent) and Scots pine (31 per cent) are the most common tree species in Norwegian forests, representing 75% of the total standing stock. Broad-leaved (25 per cent) is increasing the most, and over the last ten years the volume of broad-leaved species has increased by 40 per cent.

Almost all Norwegian forests are part of a certification scheme. PEFC certification covers 98 % of al industrial roundwood (73 million decares forest area). About 100 forest properties has a double certification FSC/PEFC (4,4 million decares forest area)

Annually, Norwegian forests absorb 25 million tons of CO₂. (about 50% of the Norwegian annual emissions of climate gases).

Forest Property

The tenure rights of ownership is 79% private and 21% public in Norway. Less than 10 per cent is owned by the government and the remainder is owned by companies, forest-commons and municipalities. The average property size in 2017 is 55 hectares of productive forest area. The total registered productive forest area amounted to 7 million hectares. In 2016, timber was cut for sale on 14 000 forest properties. The average commercial roundwood removal per property was 724 cubic meters.

80% of the timber for industrial use comes from family owned forests connected to forest owners' cooperatives.

The timber cooperatives were formed about a hundred years ago by family forest owners. There are four regional forest owners' cooperatives in Norway with around 35000 members.

Forest management

The use of Norwegian forest is regulated under the Forest Act. The Forestry Act was renewed in 2005. Forestry has relatively few regulations in Norway. Harvesting is regulated by the Ministry of Agriculture and Food. The purpose of the Forest Act is to promote sustainable management of forest resources in Norway with a view to promotion of local and national economic development, and to secure biological diversity, consideration for the landscape, outdoor recreation and the cultural values associated with the forest.

Forestry in Norway is regulated by several laws and regulations that ensure sustainable management of forest resources.

1. The Forestry Act: This act gives the forest owners freedom under responsibility, and they must ensure that all measures in the forest comply with laws and regulations.
2. The Sustainability Regulations: Regulates how forestry must be carried out to be sustainable.
3. The Natural Diversity Act: Protects biological diversity and ecosystems.
4. The Outdoors Act: Regulates the general public's right to travel in outlying areas.
5. The Planning and Building Act: Contains provisions on planning and approval of agricultural roads
6. The Motor Traffic Act: Regulates motorized traffic in rural areas

These laws and regulations help to ensure that forestry in Norway is both economically and environmentally sustainable.

Protected areas

In 2016, the Parliament decided goal of protecting 10 per cent of the Norwegian forested areas, partly through voluntary protection, partly through conserving public forests.

Species

CITES species are present in Norway, but do not include any tree species.

Norway has formally adopted a Red List classification of species in accordance with criteria from the International Union for Conservation of Nature (IUCN). The most recent edition of the Norwegian Red List (2015) includes 4438 species, 2355 of which are considered to be threatened (critically endangered, endangered or vulnerable), while 1235 are listed as near threatened. In Norway, land-use change is considered to be a threat to 90 % of all critically endangered, endangered and vulnerable species (threatened species). Commercial forestry is a threat to 41% of these vulnerable species. More species are associated with forests than with any other main habitat in Norway (26,000 known species of plants and animals). Almost half (48 %) of all threatened species are found in forest, either exclusively or both in forest and in other habitats. The largest numbers of threatened species in forest habitats are in the species groups fungi (353 species), beetles (230 species), true flies or Diptera (128 species) and lichens (124 species). Many of the threatened species in forest are specialists, for example found on dead wood, large deciduous broad-leaved trees, burnt areas left by forest fires, or calcareous soils. A large proportion of the red-listed species found in forests are associated with rich broad-leaved forest, even though this only makes up 1 % of Norway's productive forest area.

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

Products included in the scope of SBP Certification: *WB 1.1 Wood pellets*

Number of employees: 8

Annual maximum production capacity (metric tonnes): 80000

Number of direct feedstock suppliers: 14

Approximate number of feedstock sub-suppliers: 0

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

Chain-of-custody

Moelven Virke AS supply Moelven Pellets AS with woodworking residues from nine sawmills within the Moelven Group in Norway, and residues from five group-external sawmills.

Moelven Virke AS also supply all the sawmill within the Moelven Group in Norway with timber of Norway spruce (*Picea abies*) and Scots pine (*Pinus sylvestris*). Moelven Virke procures timber from timber cooperatives in Norway. 80% of the timber for industrial use comes from family owned forests connected to forest owners' cooperatives. The timber cooperatives were formed about a hundred years ago by family forest owners. There are four regional forest owners' cooperatives in Norway with around 35000 members. All trading is registered in the IT system VSYS. The transport is also registered in VSYS. VSYS also contain coordinates for every pick up point for timber at the forest road. Each load is registered as a measuring ticket. It is an independent organization (Norsk Virkesmåling) that measuring quantity and quality on the sawmill. The five group-external sawmills is also supplied with timber from timber cooperatives in Norway, and all trade is registered in VSYS.

All the processing residues are procured with an FSC and/or PEFC certification claim.

2.2 Detailed description of the Supply Base

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

Annex 1 is generated by the system if the SBP SBE is used without Regional Risk Assessment(s) (RRAs). In case RRA(s) is used, further details shall be given only in section 3 below.

Annex 2 is generated if EU RED SBE is in the scope for each country separately.

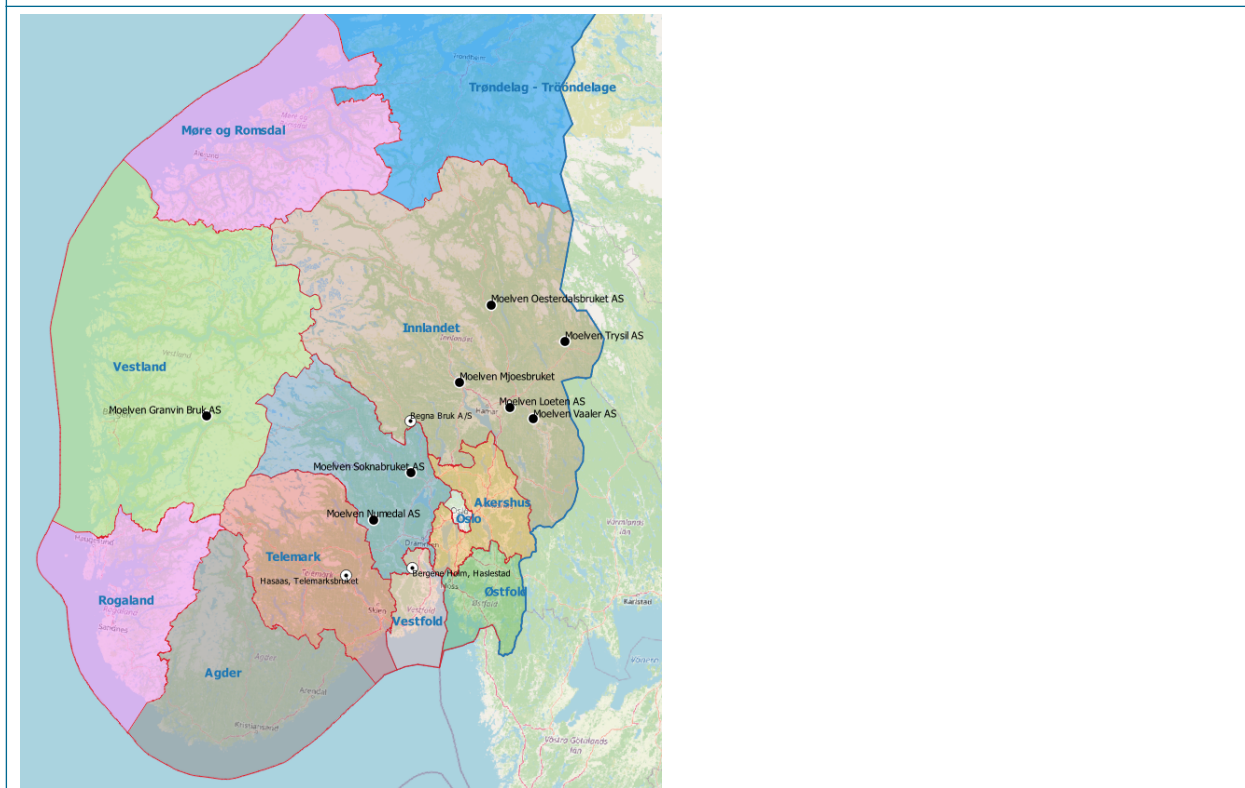
Country	Norway
Area/Region	-
Exclusions	Troms, Finnmark, Agder
Feedstock types	Processing residues ¹
Feedstock Product Groups	Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock
Is the forest managed to supply energy and non-energy markets?	Yes - Majority
For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?	Yes - Majority
Risk assessment(s)	N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme
Provide a concise summary of why a SBE was determined to be required or not required here:	
All the processing residues are procured with an FSC and/or PEFC certification claim.	

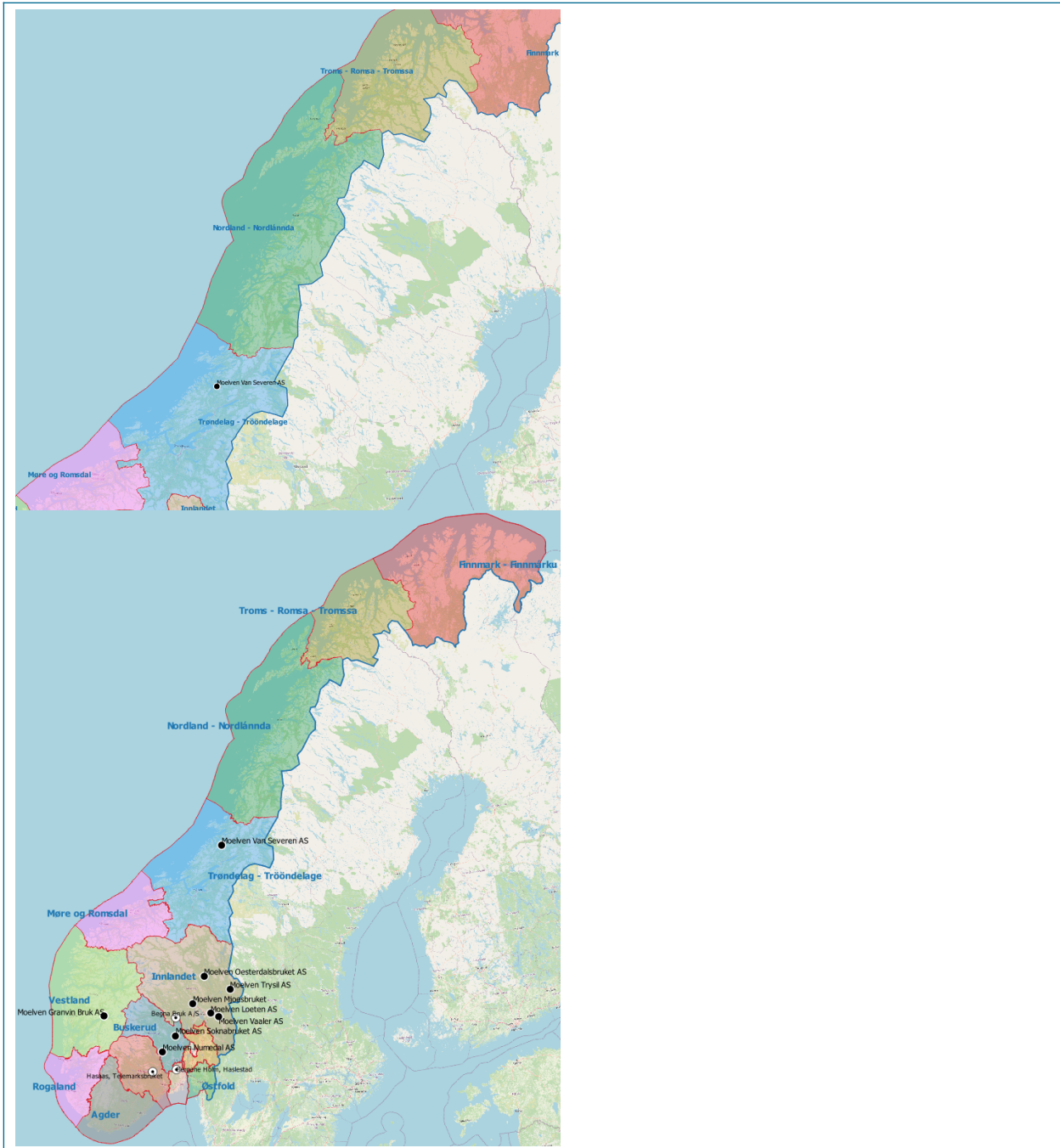
The Forestry Act, requires the forest owner to ensure that the regeneration of forest is initiated within 3 years after the harvesting has taken place. The Sustainability Regulations regulates how forestry must be carried out to be sustainable. All trading is registered in the IT system VSYS. The transport is also registered in VSYS. VSYS also contain coordinates for every pick up point for timber at the forest road. Each load is registered as a measuring ticket. It is an independent organization (Norsk Virkesmåling) that measuring quantity and quality on the sawmill.

A SBP national risk assessment has been published for Norway.

Feedstock types included in SBE:	Processing residues ¹ , N/A
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):	14.0000

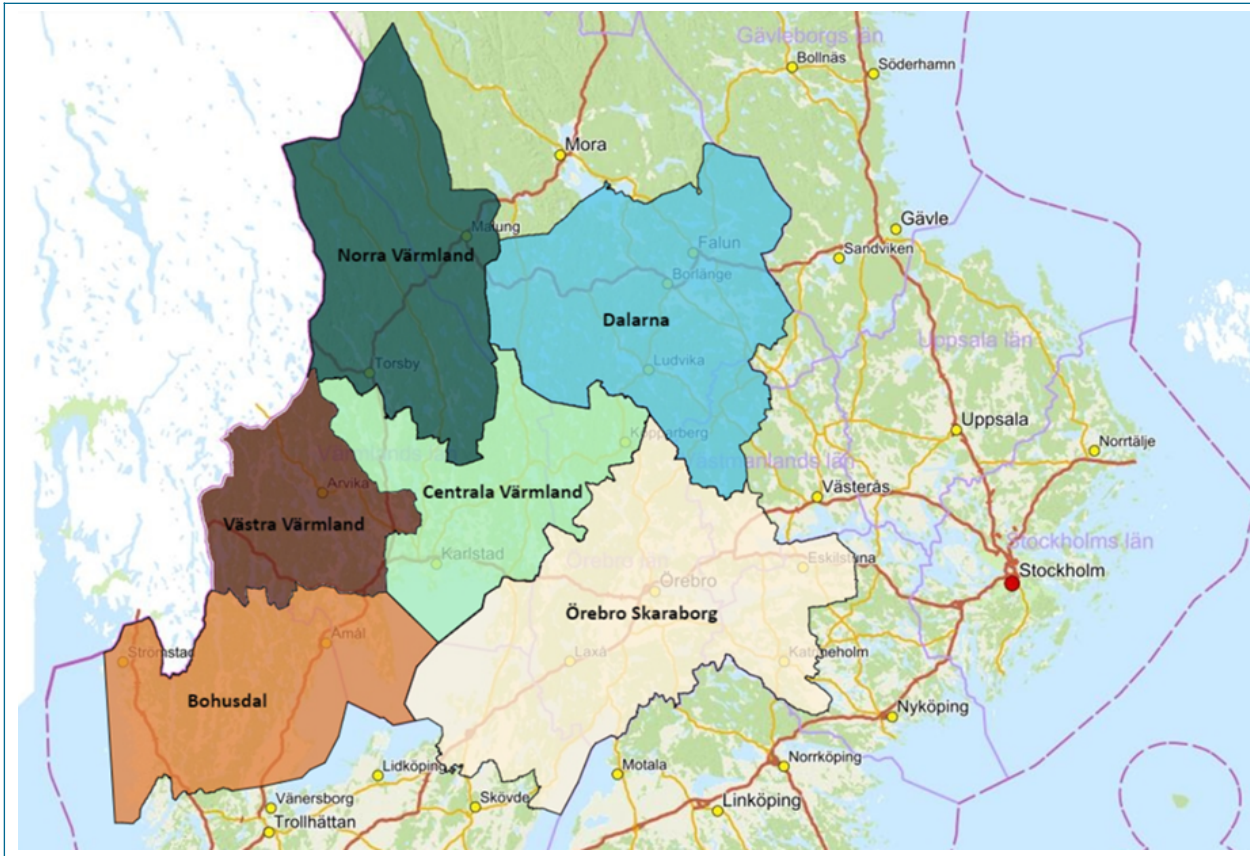
Map(s) of the Supply Base area:





Country	Sweden
Area/Region	Dalarna, Värmland, Bohusdal, Örebro Skaraborg
Exclusions	
Feedstock types	Processing residues ¹
Feedstock Product Groups	Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock

Is the forest managed to supply energy and non-energy markets?	Yes - Majority
For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?	Yes - Majority
Risk assessment(s)	N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme
Provide a concise summary of why a SBE was determined to be required or not required here:	
All the processing residues are procured with an FSC and/or PEFC certification claim	
Feedstock types included in SBE:	Processing residues ¹ , N/A
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):	28.1000
Map(s) of the Supply Base area:	



Virkesbalansområden

-  Balansområde 1
-  Balansområde 2
-  Balansområde 3
-  Balansområde 4



2.3 Feedstock information

- a. **Total volume of Feedstock:** 1-200,000 tonnes
- b. **Volume of primary feedstock:** 0
- c. **List of all the species in primary feedstock, including scientific name:**

Picea abies Norway spruce

Pinus sylvestris Scots pine

- d. **Was the feedstock used in the biomass removed from a forest as part of a pest/disease control measure or a salvage operation?** No
Explanation:
- e. **Hardwood (i.e. broadleaf trees): specify proportion of feedstock from (%):** 0.00
- f. **Softwood (i.e. coniferous trees): specify proportion of feedstock from (%):** 100.00
- g. **Proportion of feedstock composed of or derived from saw logs by weight (%):** 100.00
- h. **Indicate how you determine the proportion of saw log:** Specification issued by a body exercising functions of a public nature and issued for use by sawmills in the area in which the wood was grown.
- i. **Roundwood from fellings from forests with > 40 yr rotation times - Average % volume of fellings delivered to BP (%):** 100.00
- j. **Select forest type(s) where the primary feedstock was sourced from:** Mix of The Above
- k. **Select the main harvesting system(s) used for the sourced primary feedstock:** Mix of the above
- l. **Volume of primary feedstock from primary forest:**
- m. **Volume of processing residues feedstock:** 1-200,000 tonnes
Physical form of the feedstock: Chips, Sawdust, Other (specify)
- n. **Share of SBP-recognised system claim for processing residues:**

100 % PEFC

- o. **Volume of post-consumer feedstock:** 0
Physical form of the feedstock: Chips, Sawdust, Other (specify)
- p. **Estimated amount of EU RED-compliant sustainable feedstock that could be collected annually by the BP:** 200000 tonnes
- q. **What is the estimated amount of EU RED-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated):** 95000000.00 m3
Explanation: All the processing residues are procured with an FSC and/or PEFC certification claim. The Forestry Act, requires the forest owner to ensure that the regeneration of forest is initiated within 3 years after the harvesting has taken place. The Sustainability Regulations regulates how forestry must be carried out to be sustainable. All trading is registered in the IT system VSYS. The transport is also registered in VSYS. VSYS also contain coordinates for every pick up point for timber at the forest road. Each load is registered as a measuring ticket. It is an independent organization (Norsk Virkesmåling) that measuring quantity and quality on the sawmill. Interim SBP national risk assessment has been published for Norway for PEFC certified forests.

3 Supply Base Risk Assessments and Risk Management Measures

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

Not Applicable – Supply Base Evaluation not implemented

3.1 Summary of the Supply Base Evaluation

3.2 Conflicts with applicable national and sub-national legislation

3.3 Risk Management Measures

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

4 Stakeholder engagement

4.1 General description

Biomass Producer's stakeholder engagement start date: 14 Jul 2025

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

Total number of stakeholders contacted: 29

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

Moelven Pellets only procures processing residues from sawmills. The sawmills procure raw material from forest owners' cooperatives. The forest owners' cooperatives is regulated by several laws and regulations that ensure sustainable management of forest resources.

1. The Forestry Act: This act gives the forest owners freedom under responsibility, and they must ensure that all measures in the forest comply with laws and regulations.
2. The Sustainability Regulations: Regulates how forestry must be carried out to be sustainable.
3. The Natural Diversity Act: Protects biological diversity and ecosystems.
4. The Outdoors Act: Regulates the general public's right to travel in outlying areas.
5. The Planning and Building Act: Contains provisions on planning and approval of agricultural roads.

All rawmaterial is procured with and 100 % PEFC claim. There are requirements for stakeholder consultation in PEFC certification. The Norwegian PEFC Forest Standard specifies that consultations with external sources of environmental information must be conducted as part of the operational planning process. This ensures that all relevant environmental considerations are taken into account in forest management and operations.

Stakeholder consultation is not necessary, but since the the Norwegian sawmills that Moelven Pellets procures feedstock from Norwegian PEFC certified forests, Moelven Pellets has utilized the public consultation from the development of the RRA for Norway for PEFC certified forests. 29 different stakeholders where contacted in the public consultation process. No comments where received.

The approved SBR is published on Moelvens web page, and is therefore publicly available to all stakeholders at all times. No comments have been received during the reporting period.

4.2 Response to stakeholder comments

5 Report updates and approval

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

Sweden added as in supply base, as this allows Moelven Virke to procure residues from Swedish sawmills if this should become necessary.

Number of suppliers updated.

Updated stakeholder engagement

Name	Martin Hillestad
Title	Report author
Date of report approval	25 Nov 2025

Annex 1: Detailed findings for Supply Base Evaluation indicators

Annex 2: EU RED Supply Base Evaluation

Not Applicable (RED II SBE not included)

Annex 2a: EU RED II Supply Base Evaluation

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

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

Verification and monitoring of suppliers

All the suppliers are PEFC certified and the raw material is procured with a 100 % PEFC Claim. Moelven does a random invoice control every month to control the claim on the invoice.

From the sawmill in the Moelven Group there is a control from which municipality the saw logs is harvested. All trading is registered in the IT system VSYS. The transport is also registered in VSYS. VSYS also contain coordinates for every pick up point for timber at the forest road. Each load is registered as a measuring ticket. It is an independent organization (Norsk Virkesmåling) that measuring quantity and quality on the sawmill, and control the mark of the forest owner.

PEFC certification in Norway covers 98 % of al industrial roundwood From the group-external sawmills there is an agreement that all raw materials are 100 % PEFC Certified. Moelven checks the PEFC validity of group-external sawmills 4 times a year.

Feedstock inspection and classification upon receipt

Moelven collects all raw materials from its suppliers EXW. Each load is registered in the IT system VSYS. It is measured on a truck scale at Moelven Pellets. There is random sampling for measuring moisture from each feedstock supplier, and a visual inspection at Moelven Pellets. The visual inspection confirms that the load corresponds to the assortment on the transportation document.

The companies transporting the feedstock are not employed by Moelven or the other suppliers, and their inspection of the load therefore acts as a third-party verification.

Supplier audit for processing residues and post-consumer feedstock

In Moelven, there are routines for auditing our suppliers. The audit includes a review of Moelven's PEFC/FSC handbook, checking sales of certified woodworking residues and checking invoices. It is a tour of the facility, checking the measuring of incoming sawlog, checking the Log Yard, chip pockets and equipment used.

The group external suppliers are audited once per year by competent personel from Moelven Pellets, as part of our SBP routines. During this audit the validity of PEFC and FSC certificates are confirmed and sampling of three random transportation documents for the timber confirms correct claim. The audit includes a tour of the facility and verification of the production process from the timber sorting to the storage facility and loading point of the residues. The audits are documented with a report where images and other relevant documentation are apennended, and completed audit reports are stored digitally.

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).