SBP

Sustainable Biomass Program

Supply Base Report: Biosilva Agroforestal S.L.

First Surveillance Audit

www.sbp-cert.org

Completed in accordance with the Supply Base Report Template Version 1.3

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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Version 1.2 published 23 June 2016

Version 1.3 published 14 January 2019

Contents

1 Overview

Producer name: Biosilva Agroforestal S.L.

Producer location: Calle Oro 55, 28770, Colmenar Viejo, Madrid, Spain

Geographic position: See Google Maps

Primary contact: David Holgado Thornhill; Calle Oro 55, 28770, Colmenar Viejo, Madrid, Spain; 606302791; dholgado@biosilva.com

Company website: http://www.biosilva.com (en construcción)

Date report finalised: 03/Jun/2019

Close of last CB audit: 04/Jul/2019, Alicante, España

Name of CB: NEPCon

Translations from English: No

SBP Standard(s) used: sbp-standard-1-feedstock-compliance-standard-v1-0; SBP-standard-2-verification-of-sbp-compliant-feedstock-v1-0; sbp-standard-4-chain-of-custody-v1-0; sbp-standard-5-collection-and-communication-of-data-v1-0

Weblink to Standard(s) used: https://sbp-cert.org/documents/standards-documents/standards

SBP Endorsed Regional Risk Assessment: N/A

Weblink to SBE on Company website:

Indicate how the current evaluation fits within the cycle of Supply Base Evaluations				
Main (Initial) Evaluation	**First Surveillance**	**Second Surveillance**	**Third Surveillance**	**Fourth Surveillance**
☐	X	☐	☐	☐

2 Description of the Supply Base

2.1 General description

2018:

According to data from the INE (Spanish National Institute of Statistics), Spain has the third highest forest cover in the European Union (18,417,900 hectares) after Sweden and Finland. The total forest area represents 27.7 million hectares, which is equivalent to 54.8% of the Spanish territory. According to data from MAPAMA (currently two Ministries: the Ministry of Agriculture, Fisheries and Food, and the Ministry of Ecological Transition), 36% of forest cover corresponds to public domain forests that belong to the State, to the Autonomous Communities (AC), to local organisations and to other organisations under public law; and 64% is private forests owned by individuals or legal entities under private law and are either individually or co-owned, which can be further categorised into 1) collectively-owned which represent 7% of the total, and 2) private forests, with a significant superficial variability according to the different zones, from the Galician micro-property to the large estates in other Autonomous Communities, which represent 57%.

Biosilva Agroforestal S.L. defines the Supply Base as the Autonomous Community (AC) of Andalusia, the Region of Murcia, and the Valencian Community. The Autonomous Communities have well-entrenched and well-mapped boundaries in terms of both their borders and their forests. We analyse each using the statistical data available (IFN3 and 2012-2013 statistical data from the Ministry of the Government of Spain).

Andalusia:

- Andalusia has 2,920,000 hectares of forest cover on a total of 4,467,000 hectares of forest area.
- In terms of ownership, private forests represent 73.4% of the total, while public forests represent 26.6%. The public area is divided practically in half, with one part belonging to the Government of Andalusia or the State and the other to local entities.
- In terms of species, *Quercus* oak stands are dominant (35%). Pine trees, genus *Pinus*, account for 19% of the forest, and eucalyptus, genus *Eucalyptus*, 4.6%.

La vegetación forestal andaluza

TERRENOS	ESPECIES	SUPERFICIE (MILES DE HA)	% SOBRE SUPERFICIE FORESTAL
Arbolados	Quercus	1.511,3	34,8
	Coníferas	824,7	19,0
	Eucaliptal	202,1	4,6
	Otras frondosas y mezclas	103,0	2,4
Total terrenos arbolados		2.641,1	60,8
Desarbolados	Matorral mediterráneo noble	242,0	5,6
	Matorrales dispersos	306,2	7,0
	Otras formaciones	1.156,2	26,6
Total terrenos desarbolados		1.704,4	39,2
Total forestal		**4.345,5**	**100,0**

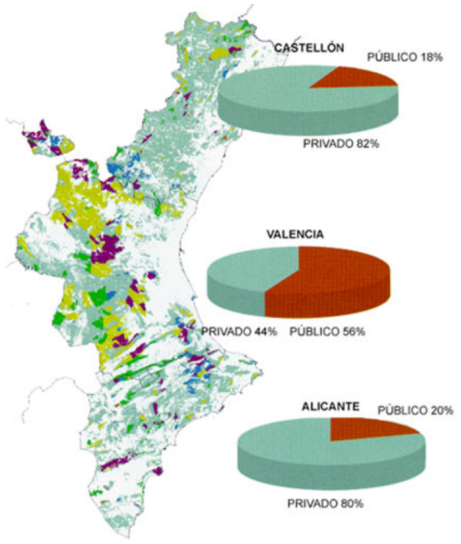
- According to IFN3 data, the stock of Andalusian forests is 75,000,000 m^3 of wood. The autonomous community felled a total of 406,000 m^3 of wood in 2012.

Valencian Community:

- The Valencian Community has 748,000 hectares of forest cover on a total of 1,267,000 hectares of forest area.
- In terms of the ownership scheme, private forest clearly predominates, except in the province of Valencia:

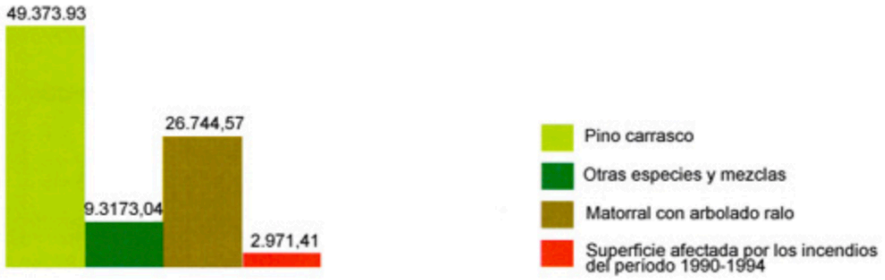
RÉGIMEN DE LA PROPIEDAD FORESTAL

Imprimir

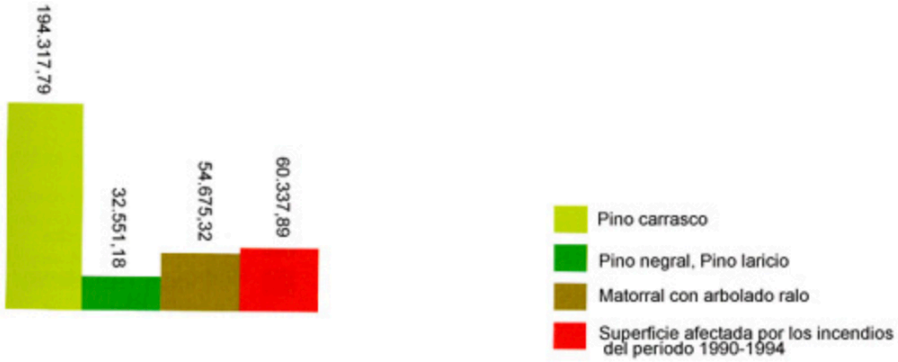


"The forest area in the Valencian Community is characterised by a dominance of private smallholdings (more than half of the private area is formed by farms of less than 1 ha), which are also strongly tied to and interconnected with agricultural use".

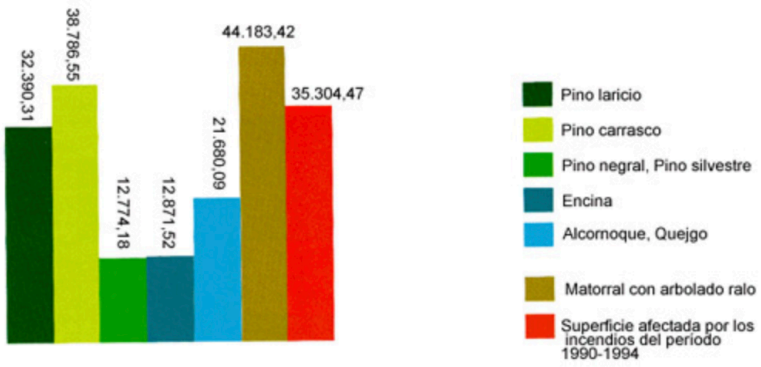
- In terms of species, pines are the dominant species in the Community's wooded area, as can be seen in the following graphs that represent the area each species (Aleppo pine = *Pinus halepensis*, Black pine = *Pinus nigra*, Scots pine = *Pinus sylvestris*) covers in each of the provinces:



El pino Carrasco domina en Alicante



El pino Carrasco domina notablemente en Valencia



Los pinares de pino Laricio y Carrasco predominan en Castellón

- According to IFN3 data, the stock of Valencian forests is 20,000,000 m^3 of wood. The autonomous community felled a total of 248,000 m^3 of wood in 2012.

Region of Murcia:

- The Region of Murcia has 302,000 hectares of forest cover on a total of 487,000 hectares of forest area.
- In terms of the ownership scheme, private forests represent 70% of Murcia's forest area. Of the 30% of public forests, 60% are owned by local entities and 40% to the regional or central administration.
- In terms of species, pines, both in natural and repopulated stands, clearly dominate the community's forests:

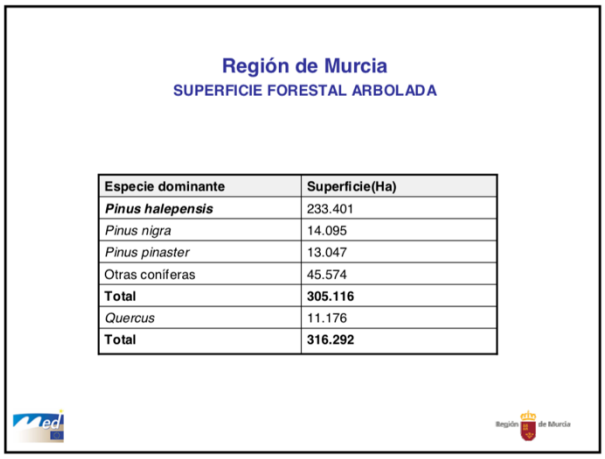
Región de Murcia: Características forestales

- Su localización "bio y ecogeográfica" favorece la presencia de **endemismos iberoafricanos**
- Sistemas forestales de los más singulares y significativos del continente europeo
- Diversidad florística con **más de 2.000 especies vegetales**
- Clima típicamente mediterráneo: marcada aridez e irregularidad pluviométrica que favorece las formaciones de matorrales (63% de la superficie forestal):

Entre los **matorrales** se distingue :
- matorral noble (*Pistacia, Quercus, Rhamnus, Chamaerops, Maytenus, Arbustus,* etc.).
- matorral característico de etapas regresivas (romeral, espartizal, albardinal, tomillar, etc.).

Entre las **formaciones arbóreas** se distinguen:
- especies frugales, especialmente pinos, tanto los naturales como los procedentes de la repoblación.
- sabinares y quercíneas xerófilas (encina y coscoja).

En los **montes arbolados** las distribuciones de estas formaciones son:
- 96% coníferas.
- 4% de frondosas.



Región de Murcia
SUPERFICIE FORESTAL ARBOLADA

Especie dominante	Superficie(Ha)
Pinus halepensis	233.401
Pinus nigra	14.095
Pinus pinaster	13.047
Otras coníferas	45.574
Total	**305.116**
Quercus	11.176
Total	**316.292**

- According to IFN3 data, the stock in Murcia's forests is 9,116,000 m^3 of wood. The autonomous community felled a total of 1,368 m^3 of wood in 2012.

Within this area, Biosilva Agroforestal defines its scope of primary feedstock from forestry works/harvesting: pruning, thinning, clearing and/or final felling of *Pinus* and *Eucalyptus* species. Included within this scope is the transportation of the material (as round wood, stumps, wood chips) from the forest to the port facilities and, if necessary, the transportation of the chips to the international final port.

Regarding the defined Supply Base, various species of the genus *Pinus* are found in three Autonomous Communities, while various species of genus *Eucalyptus* are only found in Andalusia.

In terms of the forestry works, origin of the primary feedstock, Biosilva Agroforestal can:

1. directly perform forestry works/harvesting with our own or subcontracted equipment, under its responsibility, or
2. buy the feedstock from companies that have done the work

In both cases, the works can come from:

- Public contracts, in which case the harvesting areas are always identified and mapped in the specifications that define the contracting of the work.

- Contracts in private forests, in which case a Management Plan may be available that identifies the work zones or access to the cadastral reference of the affected parcel(s), together with the private contract that covers the work.
- It is crucial to always have the corresponding authorisations by the Autonomous Communities, which will specify the work areas; these must be received before work can begin.
- Forestry work in both public and private forests is subject to the guidelines set by the Public Administration, as well as to the supervision of Public Administration staff.

In Spain, cadastral information on urban and rural properties throughout the country is available. All properties have a unique cadastral reference that allows them to be identified and located. *"The cadastral reference is the official and obligatory identifier of properties. It is an alphanumeric code, consisting of twenty characters, which is assigned by the Cadastral Registry to ensure that every property has a single cadastral reference. The cadastral reference makes it possible to locate the property on a cadastral map".*

A study conducted by COSE (Spanish Confederation of Forest Organisations) and published by MAPAMA in 2013 concluded that the degree of management by the forest authority is high or very high in all Autonomous Communities except Galicia, where the management level is considered medium. It is therefore determined that there is no risk of large-scale illegally sourced wood.

The Spanish Constitution divides responsibilities between the different authorities, with forest management being left in the hands of the AC.

The Forestry Law (Law 43/2003 of 21 November on Forests, Law 10/2006 of April 28, and Law 21/2015 of July 20, which modifies Law 43/2003, the Law of Consolidation) gives the Autonomous Communities the powers to manage and control the forests.

Chapter IV - Forest Harvesting establishes that:

- When there is a Management Plan or equivalent in place, or the forest is included within the scope of a PORF (Forest Resources Management Plans), the owner must notify the competent body of the Autonomous Community before harvesting timber.
- In other cases, (where there is no Management Plan or similar in place), administrative authorisation is required before logging.

In the case of public forests managed by the administration (public property), internal approval of the Autonomous Community's Forest Service is required.

Each AC develops its own legislation and models for both public tenders and permits and authorisations for forestry work and harvesting. There are three relevant documents required to verify the legality of the harvesting and compliance with the requirements of the EUTR:

- Notification of work/harvesting (in private forests for works included in the planification of approved Management Plans where the legislation of AC allows)
- Authorisation of work/harvesting (in private forests with no management plan or other extenuating circumstances, according to the legislation of the AC)
- Adjudication of works (in public forests)

Land tenure and land use rights are covered by Spanish legislation and the authorities have implemented tools to register and monitor these rights. These rights have had significant social and economic relevance for centuries, and as a result are widely developed and recognised. Spain scores higher than 50 in Transparency International's corruption perception index, with a score of 57 in 2017, and although the value has fallen since

2012 (value of 65), there are no reports that significantly link corruption with the forestry sector. The level of governance can be categorised as robust. There are no reports of significant conflicts related to the ownership of the forest lands or the legitimacy of their use. In turn, there is legislation that protects land use. Forest lands are classified as rural within the Urban Plans and there is legislation that protects them from different uses.

There are two types of fees to pay for harvesting wood:

1) fees imposed by the Autonomous Communities for the licenses that are required for forestry works/harvesting in private forests. Each AC independently regulates these fees. In public contracts there are payments associated with the contracts that must be made once the work has been contracted and before it is signed.
In any event, having authorisations or contracts issued by public administrations implies that the corresponding fees have been paid.
2) VAT linked to transactions and subsequently, income and/or business tax. The VAT is paid to the Treasury on a quarterly basis and the income and/or business tax on an annual basis.

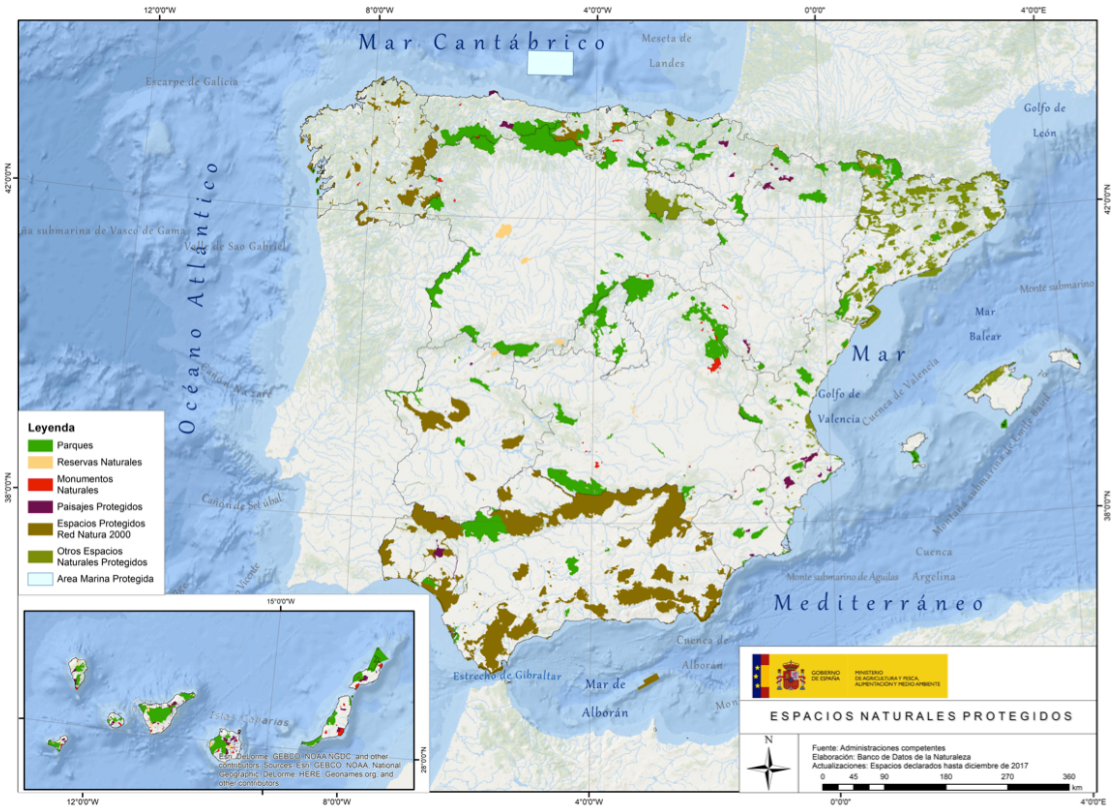
Biosilva Agroforestal has two Chain of Custody certificates: FSC (SGSCH-CoC/CW-060363) and PEFC (ES19/85349), as well as ISO 9001:2015, ISO 14001:2015 and OHSAS 18001:2007 certifications. Due to characteristics of the work performed by Biosilva Agroforestal (forestry work and harvesting, chipping and selling the chips, or purchasing of chips for sale), the supply chain is non-existent or extremely short (a single supplier that does the work and sells the chips to Biosilva Agroforestal). In the period audited, 60% of the chips managed were purchased from suppliers and 40% generated by Biosilva Agroforestal.

In Spain there is a systematic legal framework for the protection of natural areas and areas with high conservation values: “According to Law 42/2007 on Natural Heritage and Biodiversity, those spaces in the national territory, including protected areas, including inland and marine waters under sovereign or national jurisdiction, including the exclusive economic zone and the continental shelf, that meet at least one of the following requirements and are declared as such:

- Contain natural systems or elements that are representative, fragile, threatened or of special ecological, scientific, scenic, geological or educational interest.
- Be devoted specifically to the protection and maintenance of biological diversity, geodiversity and the associated natural and cultural resources”.

There is no forest plant species produced or cultivated in Spain on the list of CITES species. Neither pine nor eucalyptus are within the list of CITES species, Appendices I, II, and III.

There are several figures and denominations, since the majority of the Autonomous Communities have implemented legislation on this issue: National Parks, Natural Parks, Nature Reserves, Natura 2000 Network Areas, Biosphere Reserves. The protected area in Spain is 13% for natural spaces and reaches 28% when including the Natura 2000 Network, with Spain being the country that contributes most to the Natura 2000 Network, the main instrument of Europe’s conservation policy. The protected areas cover both public and private forests.



In turn, there are high conservation values linked to cultural property and prehistoric discoveries. The Iberian Peninsula is an area with a large amount of archaeological and prehistoric remains. There is both State and Autonomous Community legislation that protects and catalogues property of historical and cultural value.

The ports of origin act as collection points for chips that are later loaded onto ships and exported. Currently, Biosilva Agroforestal has the following storage sites, the majority ports.

Valencian Community:

- CASTELLÓN
- SAGUNTO
- ALICANTE
- ALICANTE LOT (A lot outside the port area was used until the permit from the port to store chips there was obtained. This permit was recently obtained so the plot is being emptied and it will soon be removed from the scope)

Region of Murcia:

- CARTAGENA

Andalusia:

- HUELVA
- CADIZ

The chips are taken directly from the Supply Base to the collection sites in the ports. The port is chosen depending on the distance between the forest and the port in order to optimise transport. Since transport costs are a relevant aspect of profitability, the possibilities of the inclusion of feedstocks not from the Supply Base are reduced. However, there are areas of the AC outside the Supply Base that ship to these ports because of their proximity, particularly in Castellón, Alicante, Cartagena and Huelva. In turn, they can reach the feedstock collection areas of the AC but are excluded from the Supply Base because they fail to fall under the scope,

like chips from fruit trees and urban pruning/felling, or chips from feedstock that was not monitored at the source. In these cases, the Chain of Custody procedure will be applied so that the "SBP compliant" feedstock and the "non-SBP compliant" feedstock are separated into clearly identified and different piles.

2019:

Update in point 13.1 of this SBR.

2.2 Actions taken to promote certification amongst feedstock supplier

Biosilva Agroforestal has two Chain of Custody certificates: FSC (SGSCH-CoC/CW-060363) and PEFC (ES19/85349). In addition, due to the characteristics of the work performed by Biosilva Agroforestal, the supply chain is non-existent or extremely short (a single supplier that performs the work and sells the chips to Biosilva Agroforestal).

2018:

One of Biosilva Agroforestal' 17 suppliers in the audited period was FSC certified. In another case, a PEFC forest in the Valencian Community was certified and work is now being done there. The Biosilva Agroforestal staff maintains direct and constant contact with the suppliers, harnessing the opportunities that arise from promoting supplier certification.

2019:

During this period, although work has been carried out in PEFC certified forests, we have not bought any feedstock with forest certification. The Biosilva Agroforestal staff keep in direct and constant contact with suppliers, taking advantage of the opportunities that arise from encouraging certification amongst them.

2.3 Final harvest sampling programme

2018:

Information has been gathered from Juan Manuel Camacho, Technical Production Director, a forest engineer in charge of making site visits to the worksites, both Biosilva Agroforestal' own and those of its suppliers in Levante (Valencian Community and Region of Murcia) and Andalusia to determine if there is any feedstock that comes from final cuts in stands with an over 40-year turnover (pine forests).

According to the information collected, it can be concluded that work in pine forests with regeneration fellings has only been performed in public forests in the Region of Murcia. Thirty percent of the material extracted from these forests are sourced from regeneration fellings. This is a work order for Murcia's public forests that includes a large number of types of work in the stands, one of which is regeneration felling with successive thinning. This represents 5.26% of the total feedstock managed by Biosilva Agroforestal within the Supply Base during the period.

Bearing in mind that Biosilva Agroforestal sold over 60,000 tons of wood chips for export during this period, only 5.26% of which correspond to final fellings: over 3,000 tons of chips from final fellings, representing approximately 4,000 m³ of roundwood; and that, according to the statistics analysed, 555,368 m³ of roundwood was cut in the three Autonomous Communities in the defined Supply Base in 2012, it can be concluded that

the volume from final felling managed by Biosilva Agroforestal represents 0.7% of the volume of felling in the Supply Base.

Biosilva Agroforestal makes site visits to each worksite where work is outsourced, resulting in clear control of the type of work being performed.

The low-intensity forest management in the three Autonomous Communities in many cases implies that pine forests stands have a management deficit and require significant work to improve their condition, which may include the felling of mature trees.

2019:

Information has been gathered from the Biosilva Agroforestal technical team to determine if there is any feedstock that comes from final cuts in stands with an over 40-year turnover. According to the information collected from the work carried out during this auditing period, it can be concluded that this does not occur, and this point does not apply, since the only feedstock that comes from final cuts is that of the eucalyptus species, with turnovers that are always under 40 years.

Biosilva Agroforestal visits all the places where work on feedstock that ends up in its facilities is carried out, so it maintains clear control over the type of work that is performed.

In the 4 AC where work has been carried out over this period (Andalusia, Castilla La Mancha, Region of Murcia and the Valencian Community) forest management is of low intensity, with a management deficit in many pine forest stands, which means that significant improvements are required which may include the felling of mature trees without these necessarily being final cuts.

In the new AC of northern Spain that have been included in the scope and where Biosilva has not yet worked the management is high-intensity and there is a considerable variety of planting species and harvesting turnovers. Once work begins on them, the impact of this aspect on the biomass obtained will be evaluated.

2.4 Flow diagram of feedstock inputs showing feedstock type [optional]

Flow diagram not included.

2.5 Quantification of the Supply Base

2018:

Data from IFN3 (Spanish National Inventory 3) and AC governments, except certification data from FSC and PEFC

a. Total Supply Base area (ha): 3.970.000 ha wooded forested area; 6.221.000 ha forested area
b. Tenure by type (ha): 2.888.752 ha forested area privately owned / 1.081.248 ha forested area public owned.
c. Forest by type (ha): 3.970.000 ha wooded forested area temperate; 6.221.000 ha forested area temperate
d. Forest by management type (ha): 202.100 ha plantation forested area (Eucalyptus Andalucía) / 3.767.900 ha managed natural or natural
e. Certified forest by scheme (ha):

PEFC Spain: 2.170.441 ha (Andalusia 273.614 ha; Valencian Community 1.212 ha; Murcia 0 ha)

FSC Spain 271.697 ha (Andalusia 145.412 ha; Valencian Community 0 ha; Murcia 0 ha)

Feedstock

f. Total volume of Feedstock: 0 – 200,000 tonnes (Exact data are shared in auditing, but are not made public due to issues of confidentiality and jurisdiction/competence)
g. Volume of primary feedstock: 0 – 200,000 tonnes (Exact data are shared in auditing, but are not made public due to issues of confidentiality and jurisdiction)
h. List percentage of primary feedstock (g), by the following categories. Subdivide by SBP-approved Forest Management Schemes:
    - 0%-19% Certified to an SBP-approved Forest Management Scheme
    - 80%-100% Not certified to an SBP-approved Forest Management Scheme
i. List all species in primary feedstock, including scientific name:

The company categorises by genus only (Pine/*Pinus*), (Eucalyptus/*Eucalyptus*) since the chips are in no way differentiated at the time of sale.
However, the main species from which the feedstock is sourced are:

- *Pinus halepensis*
- *Pinus pinea*
- *Pinus pinaster*
- *Pinus nigra*
- *Pinus silvestris*
- *Pinus radiata*
- *Eucalyptus globulus*
- *Eucalyptus nitens*
- *Eucalyptus camaldulensis*

j. Volume of primary feedstock from primary forest: None
k. List percentage of primary feedstock from primary forest (j), by the following categories. Subdivide by SBP-approved Forest Management Schemes:
    - None Primary feedstock from primary forest certified to an SBP-approved Forest Management Scheme
    - None Primary feedstock from primary forest not certified to an SBP-approved Forest Management Scheme
l. Volume of secondary feedstock: None.
m. Volume of tertiary feedstock: None.

* Compelling justification would be specific evidence that, for example, disclosure of the exact figure would reveal commercially sensitive information that could be used by competitors to gain competitive advantage. State the reasons why the information is commercially sensitive, for example, what competitors would be able to do or determine with knowledge of the information.
Bands for (f) and (g) are:
1. 0 – 200,000 tonnes or m^3
2. 200,000 – 400,000 tonnes or m^3
3. 400,000 – 600,000 tonnes or m^3
4. 600,000 – 800,000 tonnes or m^3
5. 800,000 – 1,000,000 tonnes or m^3
6. >1,000, 000 tonnes or m^3

Bands for (h), (l) and (m) are:

1. 0%-19%
2. 20%-39%
3. 40%-59%
4. 60%-79%
5. 80%-100%

NB: Percentage values to be calculated as rounded-up integers.

2019:

Update in point 13.4 of this SBR.

3 Requirement for a Supply Base Evaluation

SBE completed	SBE not completed
X	☐

4 Supply Base Evaluation

4.1 Scope

Biosilva Agroforestal defines the Supply Base of the risk analysis as the forest area of the following Autonomous Communities in Spain: Andalusia, Region of Murcia, Valencian Community and Castilla La Mancha (mainly provinces of Cuenca and Albacete), Galicia, Asturias, Cantabria and Euskadi.

Within this supply base Biosilva Agroforestal defines its scope in terms of raw material, “primary feedstock”, coming from forestry works/harvesting: pruning, thinning, clearing and/or final felling mainly of Pinus (with the exception of Euskadi where it is not included in the scope), and Eucalyptus species. In the Communities of the Cantabrian Cornice, especially in the Basque Country, there are plantations of conifers of other species. There may also be holm oak and cork oak occasionally, in the Mediterranean area, as well as other species of broadleaf trees, in the Atlantic area, as a result of their appearance in the areas of forestry works or harvesting. The estimated volume of these species different from the main ones is estimated to be 5% of the total.

Included within this scope is the transportation of the material from the forest to the port facilities, as round wood, stumps, wood chips and, if necessary, the transportation of the chips to the international final port.

The ports of origin act as collection points for the chips which are then loaded onto ships and exported. Biosilva Agroforestal currently has the following active collection points, the majority of which are ports: CASTELLÓN, SAGUNTO, VALENCIA/VALENCIA LOT and ALICANTE/ALICANTE LOT in the Valencian Community; CARTAGENA in the Region of Murcia; and HUELVA, CADIZ, ALMERÍA, SEVILLE, MOTRIL, MALAGA and ALGECIRAS in Andalusia.

The transfer of ownership can take place at the port of origin in Spain, or at the destination port, in which case Biosilva Agroforestal takes care of the maritime transport of the material sold.

4.2 Justification

The risk analysis has been approached from positive perspective that from the conjunction of the type of work and genera with which we work, the system implemented by Biosilva Agroforestal, the level of forest management existing in Spain and the level of control of Public Administrations, a risk analysis could be carried out based on the indicators defined by SBP in the 8 Autonomous Communities chosen with the necessary risk mitigation measures as appropriate.

4.3 Results of Risk Assessment

Once all the indicators defined by SBP had been analysed, the following indicators were named as specified risk which requires risk mitigation measures:

- 2.1.1. The Biomass Producer has implemented appropriate control systems and procedures for verifying that forests and other areas with high conservation values are identified and mapped.
- 2.1.2. The Biomass Producer has implemented appropriate control systems and procedures to identify and address potential threats to forests and other areas with high conservation values from forest management activities.

- 2.2.2. The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b).
- 2.2.4. The Biomass Producer has implemented appropriate control systems and procedures to ensure that biodiversity is protected
- 2.2.6. The Biomass Producer has implemented appropriate control systems and procedures to verify that negative impacts on ground water, surface water and water downstream from forest management are minimised (CPET S5b).
- 2.4.2. The Biomass Producer has implemented appropriate control systems and procedures for verifying that natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b).
- 2.8.1. The BP has implemented appropriate control systems and procedures for verifying that appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12).

The rest of the indicators are considered to be low-risk.

4.4 Results of Supplier Verification Programme

The movements in this period did not require a supplier verification programme (SVP) as there was only one indicator with specified risk (2.8.1), so it did not apply in this period.

With the new extension of the supply base (SB), the designation has been extended with 7 indicators (2.1.1., 2.1.2., 2.2.2., 2.2.4, 2.2.6., 2.4.2. and 2.8.1.) with specified risk, thereby confirming that a supplier verification programme (SVP) is not required.

4.5 Conclusion

It is concluded that the risk analysis conducted is adequate, with solid and robust conclusions that adequately focus the steps to be taken by Biosilva Agroforestal to ensure it is compliant with all SBP requirements for the chips it sells as “SBP-compliant primary feedstock”.

5 Supply Base Evaluation Process

In order to carry out the risk analysis and the SBP certification implementation process, Biosilva Agroforestal has counted on the support of Pablo Gómez-Reino Pérez as well as the company's technical team, especially Juan Manuel Canelo, with a diploma in Labour Relations and an advanced diploma in Health and Safety, specialising in Safety, Hygiene at Work and Ergonomics and Psychosociology at Work, the Director of Quality at Biosilva Agroforestal, and Juan Manuel Camacho, a Forestry Engineer, the Technical Production Manager at Biosilva Agroforestal.

Pablo Gómez-Reino Pérez is a Forestry Engineer with extensive experience (19 years) in planning, forest management and certification. Since 2000 he has been working in forest management and planning and since 2009 he has been involved in processes related to forest certification on the Iberian Peninsula. He is an auditor of FSC forest management and of FSC and PEFC Chain of Custody. He has carried out more than 80 FSC/PEFC Chain of Custody certification audits as a leading auditor in companies in Spain and Portugal, covering all the chain of custody possibilities and with all types of companies, from small traders or printing shops to large corporations that cover the entire chain of transformation, from the forest to the end product. And more than 25 FSC Forest Management Audits and Assessments as a leading auditor in Spain and Portugal leading multidisciplinary teams in FSC forest management assessments. In January 2015 he received SBP auditor training in Tallinn (Estonia). He has been involved in the process of preparing the SBP risk analysis in Portugal. He also lends support to companies in the preparation processes for obtaining certifications.

In the consultation process, 15 relevant parties were contacted by email, focusing the consultation on industry associations and ecology organisations and environmental experts in May 2019. So far, we have received one response indicating specific environmental issues that have been taken into account to improve the risk analysis.

Biosilva Agroforestal, due to the nature of its work and the feedstock it sells (chips), visits all the places where the materials come from and Juan Manuel Camacho supervises the work, so there is a continuous evaluation process of the suppliers and the work they do. In addition, within the Biosilva Agroforestal quality system, Juan Manuel Canelo, keeps a record of a large extent of the information required by the various indicators.

6 Stakeholder Consultation

In the consultation process, 15 relevant parties were contacted by email, focusing the consultation on industry associations and ecology organisations and environmental experts in May 2019. So far, we have received one response indicating specific environmental issues that have been taken into account to improve the risk analysis.

6.1 Response to stakeholder comments

Below are the specific comments made by the relevant parties:

Comment 1: Your report seems good, I have nothing relevant to comment. I have inserted a series of “sticky notes” into the report with some minor comments, some of which are just a formality; good luck with it.

Response 1: We replied to the email, giving thanks for the review, and indicating that the comments made would be taken into account.

Comment 2: Indicator 1.5.1. Just the Cantabrian Cornice seems strange if the geographical scope of the study is much more extensive.

Response 2: We have made the change, including Spain.

Comment 3: Indicator 2.1.1. This expression (“it is necessary to have the relevant heritage authorisation”) is strange, although nearly all Spaniards would understand it, but I suppose it means something like "... relevant authorisation from the authorities responsible for cultural and historical heritage" or something like that.

Response 3: We have made the change, including the suggested wording.

Comment 4: Indicator 2.1.3. I suppose you know about the felling of the oak stands, especially in Galicia, to plant eucalyptus, even in Natura 2000 sites. In an FSC forest management audit we were told that about this and there were numerous complaints about the administration for these situations. Although there are other measures in this system to ensure that the wood from these eucalyptus trees does not reach the biomass involved, perhaps it would be a good idea to mention the possibility of this and make it clear that the company checks there are no complaints.

Response 4: That is why the previous paragraph states the following: “The most problematic situation is in Galicia where it is clear that, with the data reporting the increase in the area of eucalyptus trees in the last 20 years, there are both legal and illegal transformations to this species. However, the area that comes from native hardwood cuts, although it exists, does not appear to be relevant. All the data on the Galician areas checked indicate that the surface areas of native hardwood are also increasing in Galicia”.

Comment 5: Indicator 2.2.4. In this paragraph I would include something about the concept of "limitation", which is something that companies usually strongly oppose, but is often the only thing that actually works. Perhaps this could also apply to the mitigation measures of indicator 2.1.2.

Response 5: We have made the change, including the suggested alteration:

Indicator 2.2.4: “work is limited establishing the measures necessary to protect the elements present, such as, for example, the delimitation of zones or employing qualified personnel to biologically monitor the flora and/or fauna that may be affected by the works”.

Indicator 2.1.2: “In a positive case, a field visit is carried out prior to starting the work, establishing the corresponding limitations to be applied to the work to avoid any damage to the High Value elements of the threats detected. In turn, at the end of the work, another visit will be made to check that the protected element has not been affected. All of this is duly documented in the work file and included in the corresponding Forestry Management Technical Plan.”

There has been no change in the proposed risk designation in the indicators as a result of the consultation process.

7 Overview of Initial Assessment of Risk

Table 1. Overview of results from the risk assessment of all Indicators (prior to SVP)

Indicator	Initial Risk Rating		
	Specified	Low	Unspecified
1.1.1		X	
1.1.2		X	
1.1.3		X	
1.2.1		X	
1.3.1		X	
1.4.1		X	
1.5.1		X	
1.6.1		X	
2.1.1	X		
2.1.2	X		
2.1.3		X	
2.2.1		X	
2.2.2	X		
2.2.3		X	
2.2.4	X		
2.2.5		X	
2.2.6	X		
2.2.7		X	
2.2.8		X	
2.2.9		X	

Indicator	Initial Risk Rating		
	Specified	Low	Unspecified
2.3.1		X	
2.3.2		X	
2.3.3		X	
2.4.1		X	
2.4.2	X		
2.4.3		X	
2.5.1		X	
2.5.2		X	
2.6.1		X	
2.7.1		X	
2.7.2		X	
2.7.3		X	
2.7.4		X	
2.7.5		X	
2.8.1	X		
2.9.1		X	
2.9.2		X	
2.10.1		X	

8 Supplier Verification Programme

Not applicable. All defined indicators of low risk or specified risk.

9 Mitigation Measures

9.1 Mitigation measures

Mitigation measures have been designed to minimise the designated risks and thus be able to include all the material within the scope and Supply Base as “SBP Compliant Biomass”.

These are the mitigation measures designed in indicator 2.8.1. with specified risk designated.

> 2.8.1. The BP has implemented appropriate control systems and procedures for verifying that appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12).

The risk related to this indicator is classified as:

1. low in work in public forests, and
2. specified in terms of work accidents in forest improvement/harvesting works carried out in private forests.

Mitigation measure:

Biosilva Agroforestal has a system in place that covers all the aspects to be taken into account to ensure compliance with the legislation on the Prevention of Occupational Risks and Occupational Health and Safety. This system covers its own employees as well as its subcontractors and suppliers.

1. In all the works that are developed directly by Biosilva through its own personnel, the workers have the appropriate training and information for their position, they are given the right Personal Protection equipment for their job, and they pass the necessary checks for the medical certificate of fitness.
2. For the forestry harvesting works that are carried out by Biosilva through subcontractors, it is required that all personnel accessing the site are registered with the Social Security, and have the appropriate training and information for their position, and have been given the correct Personal Protection Equipment and they will also have had to pass the corresponding Medical Assessment. For the machinery, CE Marking or equivalent is required and if it is registered it must have the corresponding vehicle registration document and must pass the corresponding vehicle inspection test.
3. For companies that only supply material, written certification is required, stating that the harvesting carried out to produce the material was performed in compliance with the corresponding regulations on Occupational Health and Safety, both for workers and the machinery used.

In addition, Biosilva Agroforestal also has a Manual of Good Forestry Practices developed and implemented, which describes all the forestry works, how to approach them, the preventive safety measures necessary and steps to be taken in the event of an accident or emergency. Biosilva Agroforestal certifies that its employees have all been trained in this. Subcontracted companies and suppliers must also have a Manual of Good Forestry Practices implemented or must use the Biosilva Agroforestal one.

Biosilva Agroforestal also compiles information on the occupational accidents that have occurred in works it is responsible for as well as those its suppliers are responsible for. This information is then used to analyse the causes and take the necessary measures to prevent any recurrence. The system includes the need for field inspection if there is a systematic increase in occupational accidents occurring in works within the scope of certification.

Lastly, in order to mitigate risk, Biosilva Agroforestal has designed a standardisation system for the companies it works with to assess their performance in terms of Health and Safety in the forestry work they undertake. It establishes a system of visits carried out by Biosilva Agroforestal personnel (either the forest manager or those in charge of the areas) with an assessment made using a checklist relating to how the work is being carried out and the measures in place to prevent accidents or impacts. There is also a system in place for notifying the companies of any non-compliance issues and a scale with a score, which then means that the companies with the lowest scores will be inspected more often than those with higher scores.

The developed system is considered complete and sufficient for ensure the use of the correct safety measures and equipment in forestry work and to mitigate the risks related to occupational accidents.

These are the mitigation measures designed in indicator 2.1.1.with specified risk designated.

2.1.1. The Biomass Producer has implemented appropriate control systems and procedures for verifying that forests and other areas with high conservation values are identified and mapped.

The risk related to this indicator is classified as:

1. low for forestry work/harvesting in the AC of Andalusia, the Valencian Community, Region of Murcia, Castilla La Mancha, Asturias and the Basque Country, and in public contracts in Galicia and Cantabria.
2. specified for work on private properties in Galicia and Cantabria.

Mitigation measure:

For work on private properties in Galicia and Cantabria, although the administrations still have control, it is considered necessary for the correct identification and defining of the high conservation values (natural or cultural) for Biosilva Agroforestal to check on the available GIS data viewers to see if the plot(s) where it is going to work overlap with any high conservation values (cross-checking the plot with the data layers on the Natura 2000 network, Protected Natural Areas, Sites of Cultural Interest).

If there is an overlap:

- ✓ the element of high conservation value is identified,
- ✓ it is noted in the work file,
- ✓ checks are carried out to see whether or not it exists in the work area.

These are the mitigation measures designed in indicator 2.1.2.with non-specified risk designated.

2.1.2. The Biomass Producer has implemented appropriate control systems and procedures to identify and address potential threats to forests and other areas with high conservation values from forest management activities.

The risk related to this indicator is classified as:

1. low for forestry work/harvesting in the AC of Andalusia, the Valencian Community, Region of Murcia, Castilla La Mancha, Asturias and the Basque Country, and in public contracts in Galicia and Cantabria.
2. specified for work on private properties in Galicia and Cantabria.

Mitigation measure:

For work on private properties in Galicia and Cantabria, for the correct identification and correction of threats to high conservation values (natural or cultural), the following methodology is considered necessary (to be completed before the forestry work/exploitation is carried out):

1. Biosilva Agroforestal must check on the available GIS data viewers to see if the plot(s) where it is going to work overlap with any high conservation values.

    a. If there is no overlap, the work can go ahead with no need for any additional mitigation measures.
    b. If there is an overlap:
        ✓ the element of high conservation value is identified,
        ✓ it is noted in the work file,

2. check whether or not it exists in the work area,

    a. If it does not, the work can go ahead with no need for any additional mitigation measures.
    b. If it does exist in the work area:

3. The Forestry Management Technical Plan will be implemented for the area under work, determining the possible threats (if existing) of the management activities to the protected element.

    a. If no threats to the protected elements are identified, the work can go ahead with no need for any additional mitigation measures.
    b. If any threats are identified, a field visit is carried out prior to starting the work, establishing the corresponding limitations to be applied to the work to avoid any damage to the High Value elements of the threats detected. In turn, at the end of the work, another visit will be made to check that the protected element has not been affected. All of this is duly documented in the work file and included in the corresponding Forestry Management Technical Plan.

Biosilva Agroforestal has the appropriate technical means to check that the sites where it is going to work are fully cross-checked with any relevant element of high conservation values and to determine any possible threats (available GIS data viewers of the Autonomous Communities: Natura 2000 Network, Protected Natural Areas, Sites of Cultural Interest) and appropriate procedures to deal with these possible threats, including the training of its own workers as well as the workers of its subcontractors.

In addition, Biosilva Agroforestal also has appropriate procedures in place (CoC FSC certification) to ensure that this information reaches its chip suppliers (primary feedstock) so that it is taken into account in the work to be carried out.

These are the mitigation measures designed in indicator 2.2.2.with specified risk designated.

2.2.2. The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b).

The risk related to this indicator is classified as:

1. low for forestry work/harvesting in pine forests, and in eucalyptus plantations in Andalusia with gradients of below 30%
2. specified in clearcut harvests in eucalyptus plantations in Andalusia with gradient of over 30%

Mitigation measure:

In eucalyptus harvests in Andalusia, the Government of Andalusia usually limits the work in the felling licence to avoid any risk to the quality and structure of the soil. Specifically, one of the measures that is usually established in sloping areas is the prohibition of removing the stumps in order to ensure the grip of the land.

In all circumstances, for biomass from the clearcutting of eucalyptus trees on gradients of over 30%, Biosilva carries out field visits to make sure that all the specifications/limitations established in the felling licence have been followed and that the soil has not been damaged.

With regards Biosilva's methods used for work that is not carried out under its responsibility, i.e., where Biosilva buys the wood or chips, it has procedures in place to identify the origin of the feedstock and always asks for the relevant information concerning the work; contract, felling licence, permits... prior to purchasing the material.

Biosilva has a system in place to evaluate suppliers to register them on its system so it can work with them. Once the supplier has passed this stage and been certified to ensure it complies with the general procedures, the relevant documentation is requested for each harvest from which the wood is taken to provide the feedstock sold to Biosilva.

It is at this point that Biosilva undertakes the necessary checks to make sure that in areas with gradients of over 30% the limitations established in the permits are followed and to ensure that there is no significant impact on the soil, its quality and structure during the work. Biosilva goes to visit the forestry works while they are being carried out.

Biosilva also has a Manual of Good Forestry Practices, which focuses on aspects such as preserving the ecosystem, caring for the soil, reducing the risk of fire, waste management, etc. Biosilva issues this Manual to its supplier companies before starting the forestry work and then supervises the degree of compliance with the good practices listed.

These are the mitigation measures designed in indicator 2.2.4. with specified risk designated.

2.2.4. The Biomass Producer has implemented appropriate control systems and procedures to ensure that biodiversity is protected (CPET S5b).

The risk related to this indicator is classified as:

1. low for forest work/harvesting in public contracts
2. low for forestry work/harvesting on private properties that require prior authorisation for the work from the relevant authorities
3. specified for forestry harvesting on private property involving clearcutting eucalyptus trees with a continuous felling area of more than 50 ha.
4. specified for forestry work/harvesting on private properties in Galicia and Cantabria.

Mitigation measure:

For work on private properties in Galicia and Cantabria, the following methodology is considered necessary for appropriate protection of biodiversity (to be completed before the forestry work/exploitation is carried out):

1) Compile all the information available on biodiversity elements present in the work area, which can be done by Biosilva Agroforestal personnel on the visits prior to purchasing the material or through information obtained from the supplier.

   Elements of biodiversity to be evaluated in each specific situation by specialist Biosilva Agroforestal personnel may be: banks, microhabitat, mesohabitat, special species in the environment, protected species, ecotones...

   a. If this does not apply (there are no biodiversity elements in the work area), the work can go ahead with no need for any additional mitigation measures.
   b. If this does apply:
      - ✓ it is noted in the work file
      - ✓ work is limited establishing the measures necessary to protect the elements present, such as, for example, the delimitation of zones or employing qualified personnel to biologically monitor the flora and/or fauna that may be affected by the works,
      - ✓ at the end of the work, a visit will be made to check that the protected elements have not been affected. All of this is duly documented in the work file by qualified personnel

Biosilva Agroforestal has the appropriate technical means to identify elements of biodiversity to be protected in work areas and the correct procedures to approach their protection, including the training of its own workers as well as the workers of its subcontractors.

In addition, Biosilva Agroforestal also has appropriate procedures in place (CoC FSC certification) to ensure that this information reaches its chip suppliers (primary feedstock) so that it is taken into account in the work to be carried out

In cases of clearcutting eucalyptus trees in areas of over 50 hectares, which may occur mainly in Andalusia, the following work methodology is established:

1. Inspection of the felling licence to determine the limitations established with regards the elements of biodiversity.

2. Identify the elements of biodiversity to be protected, if any, during the prior field visit

   Elements of biodiversity may be: banks, microhabitat, mesohabitat, strips of indigenous vegetation, strips of scrubland, special species in the environment, protected species, ecotones...

3. If such elements are detected, the work is limited establishing the measures necessary to protect the elements present

4. On the final visit to the work area, check that the protected elements have not been affected, and then note then duly note this in the work file

In addition, and in order to prevent any associated impact, checks are carried out in the harvest area to see if there are any plant stands with more than 50 hectares of continuous clearcutting (areas in which there are no elements of discontinuity: banks, strips of vegetation/scrubland…). If there are, as well as the methodology stated above, the stand will be compartmentalised so that felling of areas of over 50 hectares is not carried out again in the same year, so the stand will be felled in successive years until the harvest is completed.

These are the mitigation measures designed in indicator 2.2.6. with specified risk designated.

2.2.6. The Biomass Producer has implemented appropriate control systems and procedures to verify that negative impacts on ground water, surface water and water downstream from forest management are minimised (CPET S5b).

The risk related to this indicator is classified as:

1. low for forest biomass with the exception of the following points
2. specified for forest biomass coming from continuous clearcutting of eucalyptus in areas of over 50 hectares
3. specified for forest biomass coming from eucalyptus felling in Andalusia in areas with gradients of over 30%

Mitigation measure:

In eucalyptus harvests in Andalusia, the Government of Andalusia usually limits the work in the felling licence to avoid any negative impacts. Specifically, one of the measures that is established is to respect river banks and water courses, as well as the prohibition of removing the stumps in order to ensure the grip of the land and make sure the water is not affected.

For biomass coming from clearcut harvesting of eucalyptus trees in areas of over 50 hectares or in areas with a gradient of over, Biosilva makes sure that all the specifications/limitations established in the felling licence are followed and that the water courses are not damaged.

To do this, the following steps are established for these cases:

1. Inspection of the felling licence to determine the limitations established with regards water courses
2. Identify the elements to be protected, if any, during the prior visit

Elements to be protected may be: water courses, banks, strips of indigenous vegetation, strips of scrubland, stumps...

3. If such elements are detected, the work is limited establishing the measures necessary to protect the elements present
4. On the final visit to the work area, check that the protected elements have not been affected, and then note then duly note this in the work file

Biosilva Agroforestal has the appropriate technical means to identify elements to be protected in work areas and the correct procedures to approach their protection, including the training of its own workers as well as the workers of its subcontractors.

In addition, Biosilva Agroforestal also has appropriate procedures in place (CoC FSC certification) to ensure that this information reaches its chip suppliers (primary feedstock) so that it is taken into account in the work to be carried out.

These are the mitigation measures designed in indicator 2.4.2.with specified risk designated.

2.4.2. The Biomass Producer has implemented appropriate control systems and procedures for verifying that natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b).

The risk related to this indicator is classified as:

1. low for pest and disease management
2. low for the management of forest fires in publicly managed forests
3. specified for the management of forest fires in privately managed forests

Mitigation measure:

It must be noted that the work carried out by Biosilva Agroforestal, forestry treatments, thinning and clearing, normally have a positive impact on the prevention of forest fires, as they reduce density and biomass in forest stands.

In addition, Biosilva Agroforestal implements a Manual of good practices, which all its workers are familiar with, and which lists the measures to take to prevent their work from causing forest fires.

In order to mitigate the defined risk, the need is established with regards work on private properties, for Biosilva Agroforestal to take the following steps:

1. Check that the property complies with its obligations in terms of fire prevention and defence: Prevention Plans,…
2. If it does, the work can go ahead, making sure in turn that the company carrying out the work complies with the obligations established by State Legislation and that of the Autonomous Communities/Provincial Departments, such as that established in the ruling of the General Directorate for the Environment and Protected Areas of 21 June 2018 of the Government of Andalusia
3. If it does not:
   - ✓ the material is rejected within the SBP risk analysis or
   - ✓ the legislation is complied with (Prevention plan,…) before the work is carried out. In this case, making sure in turn that the company carrying out the work complies with the obligations established by State Legislation and that of the Autonomous Communities/Provincial Departments, such as that established in the ruling of the General Directorate for the Environment and Protected Areas of 21 June 2018 of the Government of Andalusia.

9.2 Monitoring and outcomes

Biosilva Agroforestal already had a system for checking the work, as well as the documentation necessary for the work it carried and the work carried out by its suppliers. The mitigation measures specified in indicator 2.8.1 in force since the evaluation has been added to this system: supplier/forestry work verification system.

During this period, Biosilva Agroforestal has evaluated 3 (Biomasa Carbodiaz, Dunas 2000 and Medina Forestal) of the 6 suppliers with which it has worked (Biomasa Carbodiaz, Dunas 2000, Medina Forestal, Astillas Andalucía, Toasa and Valfor).

As a result of the inspections carried out and the documentation compiled, Dunas 2000 has been classed as category A with very satisfactory execution, and Biomasa Carbodiaz and Medina Forestal have been classed as category B with good results, as in both cases a slight fault was detected (for CarboDiaz it was a verbal issue and for Medina Forestal it was an issue of written non-conformity) resulting from problems with the sizes and dirtiness of the chips supplied. There were no significant occupational accidents at any of the works and suppliers inspected.

For each supplier and inspection an Excel file of the inspection points programme has been completed.

In view of this data, the implemented system is deemed to be effective and it is advisable to continue using it.

In turn, based on this audit, the monitoring process shall include an additional 6 indicators with specified risk: 2.1.1., 2.1.2., 2.2.2., 2.2.4, 2.2.6. and 2.4.2. for which mitigation measures have been developed.

10 Detailed Findings for Indicators

Detailed findings for each Indicator are given in Annex 1.

11 Review of Report

11.1 Peer review

Prepared by Juan Manuel Canelo, Director of Quality at Biosilva Agroforestal and reviewed by Pablo Gómez-Reino Pérez, Forestry Engineer and external consultant who collaborates with the company in the implementation of the SBP certification.

11.2 Public or additional reviews

As mentioned, a stakeholder consultation was carried out and their contributions incorporated into the final report. In this regard, the external review by Leticia Calvo Vialettes of NEPCon was the one that contributed the most. In any event, this SBR will remain posted on the Biosilva Agroforestal website (https://Biosilva.com/certification) so that comments can be received at any time.

12 Approval of Report

Approval of Supply Base Report by senior management			
Report Prepared by:	***Juan Manuel Canelo***	***Director of Quality at Biosilva Agroforestal***	***27/11/2019***
	Name	**Title**	**Date**
The undersigned persons confirm that I/we are members of the organisation's senior management and do hereby affirm that the contents of this evaluation report were duly acknowledged by senior management as being accurate prior to approval and finalisation of the report.			
Report approved by:	***Juan Manuel Camacho***	***Technical Director of Production***	***27/11/2019***
	Name	**Title**	**Date**
Report approved by:	***David Holgado Thornhill***	***Manager at Biosilva Agroforestal***	***27/11/2019***
	Name	**Title**	**Date**

13 Updates

13.1 Significant changes in the Supply Base

To the supply base of the initial evaluation Biosilva Agroforestal S.L. has added the Autonomous Communities of (provinces of Cuenca and Albacete mainly), Galicia, Asturias, Cantabria and Euskadi. These autonomous communities have defined limits, that are known and adequately mapped, in terms of their limits and their forests.

Below is the statistical data available from the Autonomous Communities included in the scope (IFN3 or/and IF4, statistical data from the Ministry of the Government of Spain Forestry Statistical Yearbook 2016).

Andalusia:

- Andalusia has 2,923,000 hectares of wooded forest land, out of a total 4,467,000 hectares of forest land.
- Private forests clearly predominate, representing 73.4% of the surface area, while public forests represent 26.6% of the surface area. The public area is divided almost in half between the area belonging to the Government of Andalusia or the State and the Local Authorities.
- According to data from the Forestry Statistical Yearbook 2016 the average stock of the Andalusian forests is 75,000,000 m3 of timber volume with bark (NFI 3). In 2016 45,018 m3 of wood with bark were felled in the community.

Valencian Community:

- The Valencian Community has 748,000 hectares of wooded forest land, out of a total of 1,267,000 hectares of forest land.
- Predominantly private forest except in the province of Valencia where public forest is more predominant. In the Valencian Community 55.2% of forest land belongs to private individuals, 38.6% is publicly owned and the ownership of 6.2% is unknown. Public ownership is shared mainly between the councils, which own three quarters of the public forest land (76%), with a smaller proportion being held by the Generalitat (15.4%) and other local authorities (8.5%).
- According to data from the Forestry Statistical Yearbook 2016 the average stock of the Valencian forests is 20,000,000 m3 of timber volume with bark (NFI 3). In 2016 19,506 m3 of wood with bark were felled in the community.

Region of Murcia:

- The Region of Murcia has 308,000 hectares of wooded forest land, out of a total of 511,000 hectares of forest land.
- Private forest land is clearly predominant and accounts for 70% of Murcia's forest area. Of the 30% of public forest, 60% belongs to local authorities and 40% to the regional or central administration.
- According to data from the Forestry Statistical Yearbook 2016 the average stock of Murcia's forests is 9,000,000 m3 of timber volume with bark (NFI 4). In 2016 no wood with bark was felled in the community.

Castilla La Mancha:

- Castilla La Mancha has 2,708,000 hectares of wooded forest land, out of a total of 3,598,000 hectares of forest land.

- Private forest ownership is clearly predominant and represents 76% of the total forest area in the community. Of the 24% of public forest, 55% belongs to local authorities and 45% belongs to the regional or central administration.
- According to data from the Forestry Statistical Yearbook 2016 the average stock of forests of Castilla La Mancha is 84,000,000 m3 of timber volume with bark (NFI 3). In 2016 776,804 m3 of wood with bark were felled in the community.

Galicia:

- Galicia has 1,454,000 hectares of wooded forest land, out of a total of 2,041,000 hectares of forest land.
- Private forest ownership is overwhelmingly predominant, representing 98% of the forest area, which, as well as forest micro-ownership (smallholdings) typical of Galician properties (1,385,550 hectares of private ownership, the vast majority of which are smallholdings, 69% of the private forest land) also includes the forest area owned under the Communal System (608,646 hectares, 31% of private forest land), both Germanic (municipal communal forest land – *MVMC*) and Roman (*abertales, fabeo* (jointly owned) and others…). 2% of the forest land is publicly owned.
- According to data from the Forestry Statistical Yearbook 2016 the average stock of the Galician forests is 193,000,000 m3 of timber volume with bark (NFI 4). In 2016 8,644,726 m3 of wood with bark were felled in the community.

Asturias:

- Asturias has 454,000 hectares of wooded forest land, out of a total of 770,000 hectares of forest land.
- Private ownership is predominant, representing 55% of the surface area (421,500 hectares), mainly smallholdings (412,985 hectares), with an average surface area of 0.6 hectares, as well as forest area owned under the Communal System (8,471 hectares, municipal communal forest land - *MVMC*). Publicly owned forest land represents 45% of the surface area (343,000 hectares), the majority of which belongs to local authorities: Councils, Rural Parishes…
- According to data from the Forestry Statistical Yearbook 2016 the average stock of the Asturian forests is 61,000,000 m3 of timber volume with bark (NFI 4). In 2016 1,146,927 m3 of wood with bark were felled in the community.

Cantabria:

- Cantabria has 211,000 hectares of wooded forest land, out of a total of 364,000 hectares of forest land.
- Publicly owned forests are clearly predominant, representing 72% of the surface area (257,655 hectares), practically all of which is owned by local authorities. Privately owned forest land represents the remaining 28% of the surface area (101,800 hectares) where, although there are some large private estates, the average size of privately owned forest land is hardly more than two hectares.
- According to data from the Forestry Statistical Yearbook 2016 the average stock of the Cantabrian forests is 27,500,000 m3 of timber volume with bark (NFI 4). In 2016 529,533 m3 of wood with bark were felled in the community.

Euskadi:

- Euskadi has 397,000 hectares of wooded forest land, out of a total of 492,000 hectares of forest land.
- Private forest ownership is predominant, representing 54%of the surface area (268,580 hectares). Half of the holdings with forest land hectares in the Basque Country are found in Bizkaia and only

11% in Álava, but the latter account for 42% of the forest area. This is due to the high total and average area of public, communal and municipal forests in this region.

In Gipuzkoa and Bizkaia the most common forest holdings (in both cases 29%) are those of between 2 and 5 hectares. In contrast, in both regions the number of holdings with a considerable forest area, or more than 100 hectares, is less than 1% of the total number of forest holdings.

In Araba the situation is quite different. The most common holdings are those of between 0.1 and 1 hectare (23% of the total) and the larger ones of over 100 hectares make up 11% of the total.

Public forests make up 46% of the forest land (226,474 hectares), which mainly belongs to local authorities, a large proportion of which are in Álava.

- According to data from the Forestry Statistical Yearbook 2016 the average stock of the Basque forests is 62,500,000 m3 of timber volume with bark (NFI 4). In 2016 1,644,634 m3 of wood with bark were felled in the community.

With regards the scope, the expansion of the Supply Base involves the inclusion of areas of high management intensity and a significant increase in the area of forest plantations, of different species of conifers as well as eucalyptus. Pine species in Euskadi are excluded from the scope. In the Communities of the Cantabrian Cornice, especially in the Basque Country, there are other species of plantation conifers, as well as pines. There may also be holm oak and cork oak occasionally, in the Mediterranean area, as well as other species of broadleaf trees, in the Atlantic area, as a result of their appearance in the areas of forestry works or harvesting, as well as feedstock from fruit trees, (in Murcia in particular), olive trees and almond trees. The estimated volume of these species different from the main ones is estimated to be 5% of the total.

In terms of the defined area of supply (Supply Base) the genus *Pinus* appears, in various species, in all the extended Autonomous Communities, while the genus *Eucalyptus*, also in various species, appears in Galicia, Asturias, Cantabria and Euskadi. In turn, other species of plantation conifers appear in Galicia, Asturias, Cantabria and, especially, in the Basque Country.

With regards the works carried out to produce the feedstock, the relevant update is that in both Galicia and Cantabria felling notifications/communications are used normally.

In the case of public forests managed by the administration (public property) internal approval must be obtained from the Forestry Service of the Autonomous Community or from the Regional Councils in the case of the Basque Country.

Biosilva Agroforestal has two Chain of Custody certificates: FSC (SGSCH-CoC/CW-060363) and PEFC (ES19/85349) active since 2016, as well as ISO 9001:2015, ISO 14001:2015 and OHSAS 18001:2007 certifications. Due to the nature of the work carried out by Biosilva Agroforestal: forestry work and harvesting, chipping and selling chips, or buying chips to sell, the supply chain is non-existent or very short (1 supplier that carries out the work and sells the chips to Biosilva Agroforestal). In the audited period, the percentages of chips handled were 48% bought from suppliers and 52% produced by Biosilva Agroforestal. In turn, no FSC/PEFC certified forest material was purchased.

The ports of origin act as collection points for the chips which are then loaded onto ships and exported. Biosilva Agroforestal currently has the following active collection points, the majority of which are ports:

Valencian Community:

- CASTELLÓN
- SAGUNTO
- ALICANTE and ALICANTE LOT

- VALENCIA and VALENCIA LOT

Region of Murcia:

- CARTAGENA

Andalusia:

- HUELVA
- CADIZ
- ALMERIA
- SEVILLE
- MOTRIL
- MALAGA
- ALGECIRAS

Biosilva Agroforestal has not yet begun to work in the extended area, so no new port is registered in this SBR.

13.2 Effectiveness of previous mitigation measures

In accordance with the established mitigation measure, Biosilva Agroforestal has monitored the supplier approval system developed, in which, in addition to all the information collected from suppliers within the quality system, data is compiled, both documentary and field, of the performance of the work carried out by the suppliers who are then classified for monitoring.

During this period, Biosilva Agroforestal has evaluated 3 (Biomasa Carbodiaz, Dunas 2000 and Medina Forestal) of the 6 suppliers with which it has worked (Biomasa Carbodiaz, Dunas 2000, Medina Forestal, Astillas Andalucía, Toasa and Valfor).

	LISTA DE PROVEEDORES APROBADOS. EVALUACIÓN DE PROVEEDORES								IM-01-SBP Ed 00 1/6/18
PROVEEDOR	FECHA DE ALTA	Histórico / puntual	CATEGORÍA A	CATEGORÍA B	CATEGORÍA C	CATEGORÍA D	Certificado ISOS OHSAS - FSC - PEFC	TOTAL	PRODUCTO / SERVICIO
BIOMASA CARBODIAZ	*1/8/18*	HISTÓRICO		X			X	6854,8 TN.	ASTILLA DE MADERA
DUNAS 2000	*15/8/18*	HISTÓRICO	X					2799,26 TN.	ASTILLA DE MADERA
MEDINA FORESTAL	1/9/18	HISTÓRICO		X				3583,94 TN.	ASTILLA DE MADERA

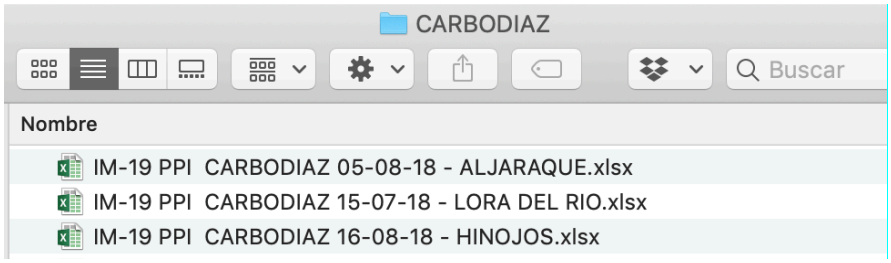
As a result of the inspections carried out and the documentation compiled, Dunas 2000 has been classed as category A with very satisfactory execution, and Biomasa Carbodiaz and Medina Forestal have been classed as category B with good results, as in both cases a slight fault was detected (for CarboDiaz it was a verbal issue and for Medina Forestal it was an issue of written non-conformity) resulting from problems with the sizes and dirtiness of the chips supplied, as shown in the table below:

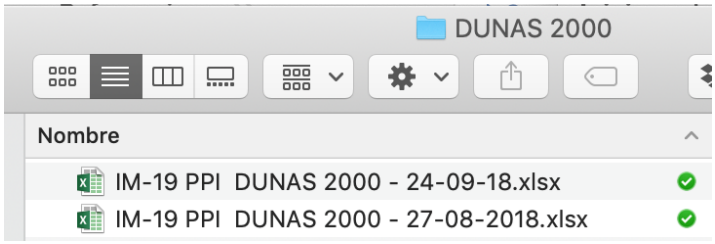
CALIFICACIÓN DE LA PRESTACIÓN DEL SERVICIO, RE-EVALUACIÓN DE PROVEEDORES (Se registran incidencias con los mismos).
Solo se registrarán las incidencias con los mismos, los comentarios se recogen en Informe de Revisión por la Dirección. Las incidencias se analizan en Indicadores de proceso. Se dará de baja a proveedores con más de 3 incidencias registradas/año o bien por decisión de Dirección.

DATOS DEL PROVEEDOR (Nombre, dirección y teléfono)	TRABAJOS REALIZADOS EN PERÍODO ANUAL	INDICENCIAS REGISTRADAS – Se remite a IM-01-SBP	RESUELTAS (SI / NO)	OBSERVACIONES
BIOMASA CARBODIAZ. FINCA LAS POSTURAS. HINOJOS (HUELVA). 959 506 090	AGOSTO - OCTUBRE 2018	SE HA RECHAZADO ALGÚN CAMIÓN POR VENIR SIN EL TAMAÑO ASTILLA ADECUADO Y SUCIEDAD.	SI	SE HA COMUNICADO VERBALMENTE AL PROVEEDOR POR PERSONAL PUERTO
DUNAS 2000. CALLE ANTONIO MACHADO, Nº 15. 21730 ALMONTE (HUELVA). TLFNO.- 959 450 392	AGOSTO - OCTUBRE 2018	NO		NO HAY INCIDENCIAS
MEDINA FORESTAL, S.L. P.I. TOMILLAR FASE 2. PARC 63. NAVE 7. 21730 ALMONTE (HUELVA)	SEPTIEMBRE 2018 - MAYO 2019	SE HA RECHAZADO MATERIAL DE UN CAMIÓN POR SUCIEDAD, BARRO Y PIEDRAS	SI	SE ABRE PARTE DE NO CONFORMIDAD Y SE COMUNICA A LA EMPRESA

There were no significant occupational accidents at any of the works and suppliers inspected.

For each supplier and inspection an Excel file of the inspection points programme has been completed:





In view of this data, the implemented system is deemed to be effective and it is advisable to continue using it.

13.3 New risk ratings and mitigation measures

Once all the indicators defined by SBP had been analysed, the following indicators were named as specified risk which requires risk mitigation measures:

- 2.1.1. The Biomass Producer has implemented appropriate control systems and procedures for verifying that forests and other areas with high conservation values are identified and mapped.
- 2.1.2. The Biomass Producer has implemented appropriate control systems and procedures to identify and address potential threats to forests and other areas with high conservation values from forest management activities.
- 2.2.2. The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b).
- 2.2.4. The Biomass Producer has implemented appropriate control systems and procedures to ensure that biodiversity is protected
- 2.2.6.
- 2.4.2. The Biomass Producer has implemented appropriate control systems and procedures for verifying that natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b).
- 2.8.1. The BP has implemented appropriate control systems and procedures for verifying that appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12).

The rest of the indicators are considered to be low-risk.

New mitigation measures defined in point 9.1.

13.4 Actual figures for feedstock over the previous 12 months

Data from the NFI 3 / NFI 4 (3rd and 4th National Forest Inventory), from the Autonomous Community Governments, from the SECF 2010 report, and from the FSC and PEFC

a. Total area of supply base (hectares): 9,240,862 hectares of wooded forest land; 13,356,622 hectares of forest land
b. Type of ownership (hectares): 9,946,413 hectares of privately owned forest land / 3,410,210 hectares of publicly owned forest land
c. Type of forest (hectares): 9,240,862 hectares of temperate wooded forest land; 13,356,622 hectares of temperate forest land
d. Type of management (hectares): 1,045,000 hectares of wooded forest plantations / 8,196,000 hectares of naturally managed wooded forest land
e. Area certified by certification scheme (hectares):
   - ✓ PEFC 663,793 hectares (Andalusia 286,720 hectares; Valencian Community 1,212 hectares; Murcia 0 hectares; Castilla La Mancha 51,444 hectares; Galicia 155,120 hectares; Asturias 3,953 hectares; Cantabria 35,387 hectares; Euskadi 92,957 hectares)
   - ✓ FSC 432,136 hectares (Andalusia 145,412 hectares; Valencian Community 0 hectares; Murcia 0 hectares; Castilla La Mancha 0 hectares; Galicia 79,661 hectares; Asturias 49,741 hectares; Cantabria 1,477 hectares; Euskadi 257 hectares)

Feedstock

f. Total volume of feedstock: 0 – 200,000 tonnes (Exact data stated in audit but not made public for reasons of confidentiality and competition)
g. Volume of primary feedstock: 0 – 200,000 tonnes (Exact data stated in audit but not made public for reasons of confidentiality and competition)
h. Percentage of primary feedstock according to SBP-approved forest management certification schemes:
   - 0%-19% Certified by an SBP-approved forest management certification scheme

- 80%-100% Not certified by an SBP-approved forest management certification scheme

i. List of all species of primary feedstock, including their scientific name:

The company only categorises them at genus level (Pine/*Pinus*), Eucalyptus/*Eucalyptus*) since when they are sold the chips are not differentiated.

Even so, the main species used for feedstock are:

- *Pinus halepensis*
- *Pinus pinea*
- *Pinus pinaster*
- *Pinus nigra*
- *Pinus silvestris*
- *Pinus radiata*
- *Eucalyptus globulus*
- *Eucalyptus nitens*
- *Eucalyptus camaldulensis*

j. Volume of primary feedstock from primary forests: None
k. Percentage of primary feedstock from primary forests according to SBP-approved forest management certification schemes:
   - No primary feedstock from primary forests certified by an SBP-approved forest management certification scheme
   - No primary feedstock from primary forests not certified by an SBP-approved forest management certification scheme
l. Volume of secondary feedstock: None.
m. Volume of tertiary feedstock: None.

13.5 Projected figures for feedstock over the next 12 months

Feedstock

a. Total volume of feedstock: 0 – 200,000 tonnes (Exact data stated in audit but not made public for reasons of confidentiality and competition)
b. Volume of primary feedstock: 0 – 200,000 tonnes (Exact data stated in audit but not made public for reasons of confidentiality and competition)
c. Percentage of primary feedstock from primary forests according to SBP-approved forest management certification schemes:
   - 0%-19% Certified by an SBP-approved forest management certification scheme
   - 80%-100% Not certified by an SBP-approved forest management certification scheme
d. List of all species of primary feedstock, including their scientific name:

The company only categorises them at genus level (Pine/*Pinus*), Eucalyptus/*Eucalyptus*) since when they are sold the chips are not differentiated.

Even so, the main species used for feedstock are:

- *Pinus halepensis*
- *Pinus pinea*
- *Pinus pinaster*
- *Pinus nigra*

- *Pinus silvestris*
- *Pinus radiata*
- *Eucalyptus globulus*
- *Eucalyptus nitens*
- *Eucalyptus camaldulensis*

e. Volume of primary feedstock from primary forests: None
f. Percentage of primary feedstock from primary forests according to SBP-approved forest management certification schemes:
    - No primary feedstock from primary forests certified by an SBP-approved forest management certification scheme
    - No primary feedstock from primary forests not certified by an SBP-approved forest management certification scheme
g. Volume of secondary feedstock: None.
h. Volume of tertiary feedstock: None.

Annex 1:Detailed Findings for Supply Base Evaluation Indicators

	Indicator
1.1.1	The Biomass Producer's Supply Base is defined and mapped.
Finding	Biosilva Agroforestal S.L. defines the supply area (Supply Base), covered by this risk analysis as the Autonomous Communities of : ✓ Andalucía, ✓ Murcia, ✓ Valencia, ✓ Castilla La Mancha (mainly the provinces of Cuenca and Albacete), ✓ Galicia, ✓ Asturias, ✓ Cantabria and ✓ Euskadi. . These autonomous communities have perfectly defined boundaries and adequate cartography, in terms of their limits and their forests. According to data obtained from the forestry statistical yearbook 2016 of the Government of Spain (https://www.mapa.gob.es/es/desarrollo-rural/estadisticas/forestal_anuario_2016.aspx): Andalucía: • Andalucía has 2,923,000 ha of wooded forest area, out of a total of 4,467,000 ha of forest area. Valencian Community: • The Valencian Community has 748,000 ha of wooded forest area, out of a total of 1,267,000 ha of forest area. Región of Murcia: • The Region of Murcia has 308,000 ha of wooded forest area, out of a total of 511,000 ha of forest area. • The Region of Murcia has 308,000 hectares of wooded forest land, out of a total of 511,000 hectares of forest land. Castilla La Mancha: • Castilla La Mancha has 2,708,000 hectares of wooded forest land, out of a total of 3,598,000 hectares of forest land. Galicia:

- Galicia has 1,454,000 hectares of wooded forest land, out of a total of 2,041,000 hectares of forest land.

Asturias:

- Asturias has 454,000 hectares of wooded forest land, out of a total of 770,000 hectares of forest land.

Cantabria:

- Cantabria has 211,000 hectares of wooded forest land, out of a total of 364,000 hectares of forest land.

Euskadi:

- Euskadi has 397,000 hectares of wooded forest land, out of a total of 492,000 hectares of forest land.

Within this area Biosilva Agroforestal defines its scope of primary feedstock from forestry works/harvesting: pruning, thinning, clearing and/or final felling of pine species (with the exception of Euskadi where it is not included in the scope), eucalyptus and other plantation species (especially in the Basque Country).

Within this area Biosilva Agroforestal defines its scope of primary feedstock from forestry works/harvesting: pruning, thinning, clearing and/or final felling of pine species (with the exception of Euskadi where it is not included in the scope), eucalyptus and other plantation species (especially in the Basque Country).
The scope includes the transport of the material from the forest to the port facilities, always as wood chip as it is chipped in the forest.

Biosilva Agroforestal can:

3. carry out forest harvesting/work directly with its own or subcontracted equipment but under its own responsibility, in which case it has all the information necessary at its disposal about the forest where the work is to be carried out, or
4. purchase the material from companies that have carried out the work, in which case the following information is collected by BIOSILVA AGROFORESTAL upon purchasing the material:
   - all suppliers providing material intended for biomass are required to provide proof of ownership, such as works awards, logging licences and contracts.
   - a document will be signed (Supply Agreement) which obliges and specifies that "the use and subsequent availability offered by Biosilva Agroforestal of the material supplied will be carried out in Spain and in compliance with the applicable legislation.
   - In all cases, before the first purchase, a preliminary check consisting of an internal inspection by the person in charge of the company, will be carried out. The following aspects will be checked:
     - Forestry documentation: Ownership of the forest, fire protection plan, if applicable, and any other documentation required by the competent authority.
     - Visit to the forest. The forest will be visited to estimate the amount and type/species of harvestable wood, and the estimated area to be harvested that can be verified on the plans.

In both cases, the work may come from:

- Public tenders, in which case the areas of use are always identified and mapped in the specifications that define the work tenders,

	○ Contracts for private forests, in which case a Management Plan may be issued that identifies the work areas or the cadastral reference of the plot(s) in question must be accessed, together with the private contract for carrying out the work.A su vez: ○ Siempre se deberá disponer (es requisito indispensable para iniciar los trabajos) de las correspondientes autorizaciones por parte de las CC.AA., en el cual se especificarán las áreas de trabajo: : Felling notification in Galicia and Cantabria or a felling licence/permit in all the Autonomous Communities. ○ In both public and private forests, forestry work is subject to the guidelines set out by the Public Authority and is also subject to supervision by personnel from the Public Authority.. In Spain cadastral information exists regarding urban and rural properties throughout the whole country. "*The Cadastre is an administrative register that comes under the remit of the Ministry of Finance and Public Administration. It contains the description of all rural and urban properties as well as those of special characteristics, which must all be registered, free of charge; these characteristics differentiate it from the Land Registry*." All properties are allocated a unique cadastral reference number that allows them to be identified and located. *"The cadastral reference number is the official and obligatory identifier of properties. It is an alphanumeric code, consisting of twenty characters, which is assigned by the Cadastre so every property must have its unique cadastral reference number. The cadastral reference number means the properties can be located on the cadastral map*." That is why, for those works for which there is no clear, updated information on the work area and its mapping, the cadastral reference number of the plot(s) in question will be used to define and map them through the SigPac (*Geographical information system for agricultural plots*) of the relevant Autonomous Communities. Based on the foregoing, the risk related to this indicator is classed as low.
Means of Verification	• The area of action is known, and appropriate scale maps are available; • BIOSILVA AGROFORESTAL key personnel demonstrate knowledge of the area of action • One of the following documents must be available: ✓ Allocation specifications of the forest works/harvesting ✓ Approved Management Plan (together with contract) ✓ Cadastral reference number of the plot(s) concerned (together with contract) ✓ Legal tenancy and management rights: felling licences/permits and authorisations.
Evidence Reviewed	Portal de la Dirección General de Catastro: • http://www.catastro.meh.es • http://www.catastro.meh.es/esp/usos_utilidades.asp • https://www1.sedecatastro.gob.es/Cartografia/mapa.aspx Government of Spain: • Ministry of Agriculture, Fisheries and Food: https://www.mapa.gob.es/es/ • Ministry for Ecological Transition: https://www.miteco.gob.es/es/ • Biodiversity: https://www.miteco.gob.es/es/biodiversidad/temas/ • Forestry statistics: https://www.miteco.gob.es/es/biodiversidad/estadisticas/ • Forestry Statistical Yearbooks: https://www.mapa.gob.es/es/desarrollo-rural/estadisticas/forestal_anuarios_todos.aspx • Forestry Statistical Yearbook 2016: https://www.mapa.gob.es/es/desarrollo-rural/estadisticas/forestal_anuario_2016.aspx Junta de Andalucía: • Regional Ministry of Environment and Territorial Planning: http://www.juntadeandalucia.es/medioambiente/site/portalweb • Forestry Service: http://www.juntadeandalucia.es/medioambiente/site/portalweb/menuitem.f497978fb

	79f8c757163ed105510e1ca/?vgnextoid=4f5c659a15255310VgnVCM1000001325e50aRCRD • Plan Infoca. The Natural Environment of Andalucía: http://www.juntadeandalucia.es/medioambiente/web/Bloques_Tematicos/Patrimonio_Natural._Uso_Y_Gestion/Montes/Incendios_Forestales/plan_infoca/Cap02_medio_natural_andaluz.pdf Región de Murcia: • Natural Environment: http://www.murcianatural.carm.es/web/guest • Forestry Sector: http://www.murcianatural.carm.es/web/guest/ambito-forestal Comunidad Valenciana: • Natural Environmet: http://www.agroambient.gva.es/es/web/medio-natural;jsessionid=D9C36F1D2D4C03BAD0A1DC6DB140AE5B • Forest and Woodland: http://www.agroambient.gva.es/es/web/medio-natural/montes • Forestry Territory of The Valencian Community: http://www.agroambient.gva.es/web/medio-natural/el-territorio-forestal-de-la-comunitat-valenciana Castilla La Mancha: • General Directorate of Forestry Policy and Natural Areas, Actions: http://www.castillalamancha.es/gobierno/agrimedambydesrur/estructura/dgapfyen/actuacionesorganismo • General Directorate of Forestry Policy and Natural Areas, Sustainable Forest Management: http://www.castillalamancha.es/gobierno/agrimedambydesrur/estructura/dgapfyen/actuaciones/gestión-forestal-sostenible • General Directorate of Forestry Policy and Natural Areas, online office: https://www.jccm.es/gobierno/agricultura/estructura/dgamen • Livestock Trails and Public Forests: http://agricultura.jccm.es/imovip/index_imv.php Galicia: • Rural Environment: http://mediorural.xunta.gal/es/ • Forestry Area: http://mediorural.xunta.gal/es/areas/forestal/presentacion/ • Environment and Land Planning: http://cmaot.xunta.gal/portada • Galician Forests in Figures: http://mediorural.xunta.gal/institucional/publicacions/forestal/o_monte_en_cifras/ Asturias: • Forestry Policy: https://www.asturias.es/portal/site/webasturias/menuitem.a76385ecc651687bd9db8433f2300030/?vgnextoid=11df7e1385dfe210VgnVCM10000097030a0aRCRD&i18n.http.lang=fr • Environmental Network of Asturias, natural areas: https://www.asturias.es/portal/site/medioambiente/menuitem.a9853809264b19f45212678ca6108a0c/?vgnextoid=37ea50c3f2d79110VgnVCM1000006a01a8c0RCRD&i18n.http.lang=es • Forestry Plan of Asturias: https://www.asturias.es/Asturias/descargas/PDF_TEMAS/Agricultura/Politica%20Forestal/planificacion/planificacion/regional/plan_forestal_de_asturias.pdf Cantabria: • Department of Rural Environment, Fisheries and Food: http://ganaderiapescaydesarrollorural.cantabria.es • General Directorate of the Environment: http://ganaderiapescaydesarrollorural.cantabria.es/web/direccion-general-medionatural

	• Forestry Regulations: http://ganaderiapescaydesarrollorural.cantabria.es/web/direccion-general-medionatural/normativa • Protected Natural Areas Regulations: http://ganaderiapescaydesarrollorural.cantabria.es/web/direccion-general-medionatural/normativa Euskadi: • Basque Forestry Plan 1994-2030: http://www.euskadi.eus/plan_vasco_forestal/web01-a2nekabe/es/ • Forestry Regulations and distribution of authority: http://www.euskadi.eus/normativa-forestal/web01-a2nekabe/es/ • Forests and Protected Natural Areas Provincial Council of Guipuzkoa: https://www.gipuzkoa.eus/es/web/mendiak-eremunaturalak • Forestry Regulations Provincial Council of Guipuzkoa: https://egoitza.gipuzkoa.eus/araudia/areaseccion.asp?areaid=30&secid=88 • Forests Provincial Council of Bizkaia: http://www.bizkaia.eus/home2/Temas/DetalleTema.asp?Tem_Codigo=223&idioma=CA&dpto_biz=2&codpath_biz=2%7C223 • Natural Heritage Provincial Council of Bizkaia: http://web.bizkaia.eus/es/-/patrimonio-natural • Forests Provincial Council of Araba: https://web.araba.eus/es/montes • Regulations Provincial Council of Araba: https://web.araba.eus/es/agricultura-ganaderia/normativa SIGPAC portals: • Mapama: http://sigpac.mapama.gob.es/fega/visor/ • Andalucía: http://ws128.juntadeandalucia.es/agriculturaypesca/sigpac/index.xhtml • Region of Murcia: https://sigpac.carm.es/VisorSigpac2017/# • Valencian Community: http://sigpac.gva.es/visor/ • Castilla La Mancha: http://sigpac.jccm.es/visorsigpachtml5/ • Galicia: http://sixpac.xunta.es/visorsixpac/ (https://sixpac.xunta.es/visorhtml5/) • Galicia, forestry works display: http://mapas.xunta.gal/visores/aproveitamentos/ • Asturias: http://sigpac.asturias.es/VisorSigPacHTML5/ • Cantabria: http://mapas.cantabria.es • Euskadi: http://arc.ikt.es/sigpac/
Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
1.1.2	Feedstock can be traced back to the defined Supply Base.
Finding	Biosilva Agroforestal S.L. defines the Supply Base covered by this risk analysis as the Autonomous Communities of: ✓ Andalusia, ✓ Region of Murcia, ✓ Valencian Community, ✓ Castilla La Mancha (mainly the provinces of Cuenca and Albacete), ✓ Galicia, ✓ Asturias,

	✓ Cantabria and ✓ Euskadi. Within this supply base Biosilva Agroforestal defines its scope in terms of raw material (primary feedstock) coming from forestry works/harvesting: pruning, thinning, clearing and/or final felling, mainly of the Pinus (pine) species, (with the exception of Euskadi where it is not included in the scope), and Eucalyptus. The main species from which the primary feedstock is sourced are: PINE • Pinus halepensis • Pinus pinea • Pinus pinaster • Pinus nigra • Pinus silvestris • Pinus radiata EUCALYPTUS • Eucalyptus globulus • Eucalyptus nitens • Eucalyptus camaldulensis In the Communities of the Cantabrian Cornice, especially in the Basque Country, there are plantations of conifers of other species. Once the work has begun in these areas the list will be updated. There may also occasionally be other species as a result of their appearance in the areas of forestry works or harvesting. The volume of these species different from the main ones is estimated to be about 3-5% of the total. List of other possible species:: • Acacia, Acacia spp. • Poplar, Populus spp. • Holm Oak, Cork Oak, and Oaks, Quercus spp. • Tamarisk, Tamarix sp. Biomass coming from agricultural zones is excluded from the scope. Included within this scope is the transportation of the material from the forest to the port facilities, as round wood, stumps, wood chips and, if necessary, the transportation of the chips to the final export port. The ports of origin act as collection points for the chips which are then loaded onto ships and exported. Biosilva Agroforestal currently has the following active collection points, the majority of which are ports. Valencian Community: • CASTELLÓN, • SAGUNTO, • ALICANTE and ALICANTE LOT, • VALENCIA and VALENCIA LOT; Region of Murcia: • CARTAGENA Andalusia: • HUELVA, • CADIZ, • ALMERÍA, • SEVILLE, • MOTRIL, • MALAGA, • ALGECIRAS

	Biosilva Agroforestal has not yet started work in the extended area of the scope, therefore no new port is registered in this SBR. In terms of the defined area of supply (Supply Base) the genus Pinus appears, in various species, in all the Autonomous Communities, while the genus Eucalyptus, also in various species, appears in Galicia, Asturias, Cantabria, Euskadi and Andalusia. In turn, other species of plantation conifers appear in Galicia, Asturias, Cantabria and, especially, in the Basque Country. There is a study carried out by COSE (Spanish Confederation of Forestry Organisations) and published by MAPAMA, 2013, which concludes that the degree of control by the forestry authority is high or very high in all the Autonomous Communities except in Galicia, where the level of control is considered to be medium. The study states that there is no risk that undeclared timber extraction will be of significant size. The Spanish Constitution divides responsibilities between the different authorities, with forest management being left in the hands of the Autonomous Communities. The Forestry Law (Law 43/2003, of 21 November, on Forests, Law 10/2006, of 28 April, and Law 21/2015, of 20 July, which amends Law 43/2003 – Consolidation Law) is a basic law which establishes the following in Chapter IV– Forestry Harvesting: • When a Management or Equivalent Plan exists, or the forest is included within the scope of a PORF (Forest Resources Management Plan), the holder must notify the competent body of the Autonomous Community before the harvest. • In other cases, (where there is no Management Plan or similar) administrative authorisation is required before harvesting. In the case of public forests managed by the public authority (public property) internal approval must be given by the Forestry Service of the Autonomous Community. Each Autonomous Community develops its models and processes, with considerable differences existing between them. Consequently, whether Biosilva Agroforestal is responsible for the works or has purchased the material from another company responsible for the works, one of the 3 documents listed below will be available, together with the data obtained when the truck enters the collection zone (delivery note, weighing…), in order to ensure that the origin of the raw material is known and can therefore be traced: ▪ Work/harvesting notification ▪ Work/harvesting authorisation (Felling licence) ▪ Allocation of the public forest works contract Biosilva Agroforestal has a management system in which an Excel file (Entries) includes all the information related to each of the trucks with raw materials (chips) that arrives at the fields: date, truck details, weights, origin of the material, supplier, distance in Km, and humidity. Biosilva Agroforestal, either in works with the Public Administration (Terms and Conditions, Contracts), or with Private companies (Contracts), specifies the (estimated) amount in tonnes that is expected to be taken from the forest in question. Once the material has been taken to the port facilities for storage, it is weighed on the official port scale. The result is given to both the Administration and the material supplier. Based on the foregoing, the risk related to this indicator is classed as low.
Means of Verification	• Excel file of Entries with information about the origin, species, supplier, carrier; • Delivery note upon entry of the material into port • One of the following documents must be available: ✓ Work/harvesting notification ✓ Work/harvesting authorisation ✓ Allocation of the public forest works contract
Evidence Reviewed	National Risk Assessment Spain 2017, FSC-NRA-ES V1-1 ES_2017-11-09: https://ic.fsc.org/en/document-center/id/150

	Study on Wood control procedures and risk assessment in each Autonomous Community for the application of the Due Diligence System: https://www.mapa.gob.es/es/desarrollo-rural/temas/politica-forestal/control_cortas_de_madera_espanya_2012_tcm30-152390.pdf Forestry Law: http://www.boe.es/boe/dias/2015/07/21/pdfs/BOE-A-2015-8146.pdf Excel file control record of Biosilva Agroforestal. Entries Documentation provided by Biosilva Agroforestal on contracts and Works allocations.
Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
1.1.3	The feedstock input profile is described and categorised by the mix of inputs.
Finding	The Biosilva Agroforestal management system registers every truck that arrives at the port with the chips from the forest works (direct transport from the forest to the port): type, origin and amount of material transported. It is always checked that each truck that leaves the works area, both public and private, enters the port facilities. This check is carried out by both the Biosilva Agroforestal manager, in the field and at the port, and also by the company supplying the material. With this data, the raw material profile can be correctly defined according to the requirements of the indicator: Primary feedstock since the transformation is carried out directly in the forest of the different species of pine and eucalyptus. When marketing the chips, Biosilva Agroforestal does not identify or separate the species, so the input data only identifies the genus (pine or eucalyptus) in its database.
Means of Verification	• Excel file of Entries with information about the origin, species, supplier, carrier.
Evidence Reviewed	Excel file control record of Biosilva Agroforestal. Entries.
Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
1.2.1	The Biomass Producer has implemented appropriate control systems and procedures to ensure that legality of ownership and land use can be demonstrated for the Supply Base.
Finding	In the National Risk Assessment for Spain 2017: FSC-NRA-ES V1-0 ES 2017-11-09 it is established that: "*Land tenure and usage rights are covered by Spanish legislation and the authorities have implemented tools to record and monitor land tenure and usage rights. Since the olden days, these rights have been of great social and economic relevance and are therefore*

widely developed and recognised. Examples of land tenure and usage rights relevant to the Spanish context include, but are not limited to: surveying and marking of public forests, registration and cadastre of property, boundaries (such as property markers) on small private properties, etc."

Spain has a score of above 50 on the Transparency International corruption perceptions index, in 2017 its score was 57, and although the score has fallen since 2012 (score of 65), there are no reports linking corruption significantly to the forestry sector. The level of governance can be categorised as robust, both in terms of the accreditation of ownership and land use. There are no reports of any significant conflicts related to the ownership of forest land or legitimacy for its use.

Some small issues or conflicts have been identified, mainly at local level, that are known and can be addressed through legal channels. Examples of these are:

- Conflicts with easements or public roads.
- Abandoned land not claimed by descendants (linked to emigration).
- Proof of unregistered property, old documents or immemorial proof of use. Particularly linked to small property.
- Different levels of knowledge about the limits of properties.
- Conflicts with consortiums.

There is, in turn, legislation protecting the use of land. Forestry land is classed as rural within the Urban Development Plans and there is legislation in place to protect it from a change of use.

In addition, Biosilva Agroforestal is a legally established company: registered on the Commercial Register of Madrid on 7 October 2008, in volume 26,147, sheet 154, section 8, page M-471,285, entry 1.

Biosilva Agroforestal also holds the ISO 9001:2015, ISO 14001:2015 and OHSAS 18001:2007 certifications, and FSC and PEFC Chain of Custody certificates (SGSCH-COC-060363) and (ES19/85349), as well as being in the transfer period for the SBP-07-03 certificate issued on 29 August 2018 which belonged to the other company of the group, Biosilva Agroforestal.

Regarding the ownership system of the forests in the 8 Autonomous Communities included in the scope.

Andalucía:

- Private forests clearly predominate, representing 73.4% of the surface area, while public forests represent 26.6% of the surface area. The public area is divided almost in half between the area belonging to the Junta de Andalucía or the State and the Local Entities. With regard to private forests, the IFN3 (3rd National Forest Inventory) classes the vast majority (3,140,386 hectares) as being of questionable or unknown ownership. However, no reports or news of problems arising from this classification have been found.

Valencian Community:

- Predominantly private forest except in the province of Valencia where public forest is more predominant.

  In the Valencian Community, 55.2% of forest land belongs to private individuals, 38.6% is publicly owned and the ownership of 6.2% is unknown.

  Public ownership is shared mainly between the councils, which own three quarters of the public forest land (76%), with a smaller proportion being held by the Generalitat (15.4%) and other local authorities (8.5%).

  The forest land of the Valencian Community is characterised by being dominated by private smallholdings (more than half of the private surface area is made up of holdings

of less than 1 ha) which, in addition, are strongly linked and interconnected with agricultural use.

Region of Murcia:

- Private forest land is clearly predominant and accounts for 70% of Murcia's forest area. Of the 30% of public forest, 60% belongs to local authorities and 40% to the regional or central administration.

Castilla La Mancha:

- Private forest ownership is clearly predominant and represents 76% of the total forest area in the community. Of the 24% of public forest, 55% belongs to local authorities and 45% belongs to the regional or central administration.

Galicia:

- Private forest ownership is overwhelmingly predominant, representing 98% of the forest area, which as well as forest micro-ownership (smallholdings) typical of Galician properties (1,385,550 hectares of private ownership, the vast majority of which are smallholdings, 69% of the private forest land) also includes the forest area owned under the Communal System (608,646 hectares, 31% of private forest land), both Germanic (municipal communal forest land, *MVMC*) and Roman (*abertales, fabeo* (jointly owned) and others…). 2% of the forest land is publicly owned.

Asturias:

- Private ownership is predominant, representing 55% of the surface area (421,500 hectares), mainly smallholdings (412,985 hectares), with an average surface area of 0.6 hectares, as well as forest area owned under the Communal System (8,471 hectares, municipal communal forest land - *MVMC*). Publicly owned forest land represents 45% of the surface area (343,000 hectares), the majority of which belongs to local authorities: Councils, Rural Parishes...

Cantabria:

- Publicly owned forests are clearly predominant, representing 72% of the surface area (257,655 hectares), practically all of which is owned by local authorities. Privately owned forest land represents the remaining 28% of the surface area (101,800 hectares) where, although there are some large private estates, the average size of privately owned forest land is hardly more than two hectares.

Euskadi:

- In the Basque Country private forest ownership is predominant, representing 54%of the surface area (268,580 hectares). Half of the holdings with forest land hectares in the Basque Country are found in Bizkaia and only 11% in Álava, but the latter account for 42% of the forest area. This is due to the high total and average area of public, communal and municipal forests in this region.

  In Guipuzkoa and Bizkaia the most common forest holdings (in both cases 29%) are those of between 2 and 5 hectares. In contrast, in both regions the number of holdings with a considerable forest area, or more than 100 hectares, is less than 1% of the total number of forest holdings.

	In Araba the situation is quite different. The most common holdings are those of between 0.1 and 1 hectare (23% of the total) and the larger ones of over 100 hectares make up 11% of the total. Public forests make up 46% of the forest land (226,474 hectares), which mainly belongs to local authorities, a large proportion of which are in Álava. Considering what has also been stated in indicator 1.1.2 about the high level of control of public administrations over forest management and planning, we can conclude that the fact that an individual has been granted authorisation to carry out forest work on certain land implies that there is legitimacy in the use of that land. Based on the foregoing, the risk related to this indicator is classed as low.
Means of Verification	• Excel file of Entries with information about the origin, species, supplier, carrier; • One of the following documents must be available: ✓ Work/harvesting notification ✓ Work/harvesting authorisation ✓ Allocation of the public forest works contract ✓ Contract/Allocation with the land owner/manager.
Evidence Reviewed	FSC National Risk Assessment for Spain, FSC-NRA-ES V1-1 ES_2018-09-11: https://ic.fsc.org/en/document-center/id/309 Study on wood control procedures and risk assessment in each Autonomous Community for the application of the Due Diligence System : https://www.mapa.gob.es/es/desarrollo-rural/temas/politica-forestal/control_cortas_de_madera_espanya_2012_tcm30-152390.pdf Forestry Law: http://www.boe.es/boe/dias/2015/07/21/pdfs/BOE-A-2015-8146.pdf Transparency international, CORRUPTION PERCEPTIONS INDEX 2018: https://www.transparency.org/cpi2018 Ministry for Ecological Transition, MITECO: • Forestry statistics: https://www.miteco.gob.es/es/biodiversidad/estadisticas/forestal_anuarios_todos.aspx • Third National Forest Inventory: https://www.miteco.gob.es/es/biodiversidad/servicios/banco-datos-naturaleza/informacion-disponible/ifn3.aspx Andalusian Forestry Plan: http://www.juntadeandalucia.es/medioambiente/site/portalweb/menuitem.7e1cf46ddf59bb227a9ebe205510e1ca/?vgnextoid=b53a30a2faa74010VgnVCM1000000624e50aRCRD&vgnextchannel=da72f8c39aeb5310VgnVCM2000000624e50aRCRD Castilla La Mancha Natural Environment Conservation Plan: https://www.castillalamancha.es/gobierno/agrimedambydesrur/estructura/dgapfyen/actuaciones/plan-de-conservación-del-medio-natural Regional Forestry Action Plan for the Valencian Community: http://www.agroambient.gva.es/auto/montes-bosques/PATFOR/01_MEMORIA/PATFOR_Memoria_version_final.pdf Forestry Strategy of the Region of Murcia: http://www.murcianatural.carm.es/c/document_library/get_file?uuid=5881e6f2-95c7-46da-8dc5-60ff6d4af1f5&groupId=14 Basque Forestry Plan 1994-2030: http://www.euskadi.eus/plan_vasco_forestal/web01-a2nekabe/es/ Forestry Plan of Cantabria: http://cantabria.geografos.org/web/download/LEGISLACION_NORMATIVA/2006-04-18%20Plan%20Forestal.pdf Forests in Asturias: https://www.asturias.es/Asturias/descargas/PDF_TEMAS/Agricultura/Politica%20Forestal/el_monte_en_asturias.pdf Forestry Plan of Asturias: https://www.asturias.es/Asturias/descargas/PDF_TEMAS/Agricultura/Politica%20Forestal/planificacion/planificacion/regional/plan_forestal_de_asturias.pdf

	Forestry Plan of Galicia: http://mediorural.xunta.gal/areas/forestal/ordenacion/plan_forestal_de_galicia/
Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
1.3.1	The BP has implemented appropriate control systems and procedures to ensure that feedstock is legally harvested and supplied and is in compliance with EUTR legality requirements.
Finding	A study conducted by COSE (Spanish Confederation of Forest Organisations) and published by MAPA in 2013, concluded that the degree of management by the forest authority is high or very high in all the Autonomous Communities except Galicia, where the management level is considered Medium and Cantabria where it is considered Medium-High. The study states that there is no risk that undeclared timber extraction will be of significant size. The study concludes that the Spanish regulations and the monitoring procedures carried out by the Autonomous Communities are consistent and guarantee the legality of wood harvesting. Each Autonomous Community develops its own legislation and models for each case, both for public tenders and for permits and authorisations for forestry works and harvesting In this respect, therefore, whether Biosilva Agroforestal is responsible for the works or has purchased the material from another company responsible for the works, one of these 3 documents will be available to verify the legality of the use and compliance with EUTR requirements: ▪ Work/harvesting notification ▪ Work/harvesting authorisation ▪ Allocation of public forest works contract Biosilva Agroforestal has a management system whereby the necessary information is documented for each of the works through the Controlled Material Supply procedure in its FSC Chain of Custody certification (e.g. environmental requirements model, which is sent to be signed by all the suppliers and specifies the requested information, including the material purchase contract and the necessary permits). Based on the foregoing, the risk related to this indicator is classed as low.
Means of Verification	• Biosilva Agroforestal records of each job including the Controlled Material Supply procedure in tis FSC Chain of Custody Certification • One of the following documents must be available: ✓ Work/harvesting notification ✓ Work/harvesting authorisation ✓ Allocation of public forest works contract.
Evidence Reviewed	FSC National Risk Assessment for Spain, FSC-NRA-ES V1-1 ES_2018-09-11: https://ic.fsc.org/en/document-center/id/309 Study on wood control procedures and risk assessment in each Autonomous Community for the application of the Due Diligence System: https://www.mapa.gob.es/es/desarrollo-rural/temas/politica-forestal/control_cortas_de_madera_espanya_2012_tcm30-152390.pdf Competent Authorities, EUTR: https://www.mapa.gob.es/es/desarrollo-rural/temas/politica-forestal/autoridades_competentes_eutr_tcm30-152385.pdf Andalucía:

	• Model authorization request. cut trees and / or reeds: http://www.juntadeandalucia.es/medioambiente/portal_web/administracion_electronica/Tramites/Agua/Autorizaciones/Autorizaciones/Modelos/corte_arboles_canas.pdf • Department of Agriculture, Livestock, Fisheries and Sustainable Development, EUTR: http://www.juntadeandalucia.es/medioambiente/site/portalweb/menuitem.7e1cf46ddf59bb227a9ebe205510e1ca/?vgnextoid=8101b10e7fcb3510VgnVCM2000000624e50aRCRD&vgnextchannel=632dee9b421f4310VgnVCM2000000624e50aRCRD Comunidad Valenciana: • Application forms for forest exploitation Valencian Community::http://www.agroambient.gva.es/web/medio-natural/aprovechamientos-forestales3 • Generalitat Valenciana, EUTR: http://www.agroambient.gva.es/es/web/medio-natural/trazabilidad-de-la-madera Región de Murcia: • Authorization for the use of forest species on private farms: https://www.carm.es/web/pagina?IDCONTENIDO=5481&IDTIPO=240&RASTRO=c672$m2469 Castilla La Mancha: • Forestry Harvesting Notification: https://www.jccm.es/tramitesygestiones/comunicacion-de-aprovechamiento-forestal • Forestry Harvesting Authorisation: https://www.jccm.es/tramitesygestiones/autorizacion-de-aprovechamiento-forestal • Felling Notification: https://www.jccm.es/tramitesygestiones/comunicacion-de-corta • EUTR: https://www.castillalamancha.es/gobierno/agrimedambydesrur/estructura/dgapfyen/actuaciones/regulación-del-comercio-de-la-madera Galicia: • Timber harvesting notification form: http://formularios.xunta.gal/formularios/generarPlantillaPDF?conselleria=MR&procedimiento=604A&version=0.0&idioma=es_ES • Company Registration Regulations of the Forestry Sector of Galicia: http://mediorural.xunta.gal/fileadmin/arquivos/transparencia/elaboracion/Orde_rexistro_sector_forestal.pdf Asturias: • Wood felling permit in privately owned forests: https://sedemovil.asturias.es/portal/site/Asturias/menuitem.46a76b28f520ecaaf18e90dbbb30a0a0/?vgnextoid=8687799a28d4f010VgnVCM100000b0030a0aRCRD&i18n.http.lang=es • Statement of Responsibility: https://sede.asturias.es/portal/site/Asturias/menuitem.46a76b28f520ecaaf18e90dbbb30a0a0/?vgnextoid=e72aabf54de25510VgnVCM10000098030a0aRCRD&i18n.http.lang=es&vgnextfmt=otrosservicios Cantabria: • Forestry harvesting notifications for species of rapid growth in private forests: https://www.cantabria.es/web/atencion-a-la-ciudadania/detalle/-/journal_content/56_INSTANCE_DETALLE/16401/3788532 • EUTR: https://ganaderiapescaydesarrollorural.cantabria.es/detalle/-/journal_content/56_INSTANCE_DETALLE/16401/6908158 Euskadi: • EUTR Agent Registration: http://www.euskadi.eus/informacion/registro-de-agentes-eutr/web01-a2elikin/es/ • Statement of Responsibility: http://www.euskadi.eus/noticia/declaracion-responsable-de-legalidad-de-la-madera/web01-a2elikal/es/

Risk Rating	☒ **Low Risk**	☐ **Specified Risk**	☐ **Unspecified Risk at RA**
Comment or Mitigation Measure			

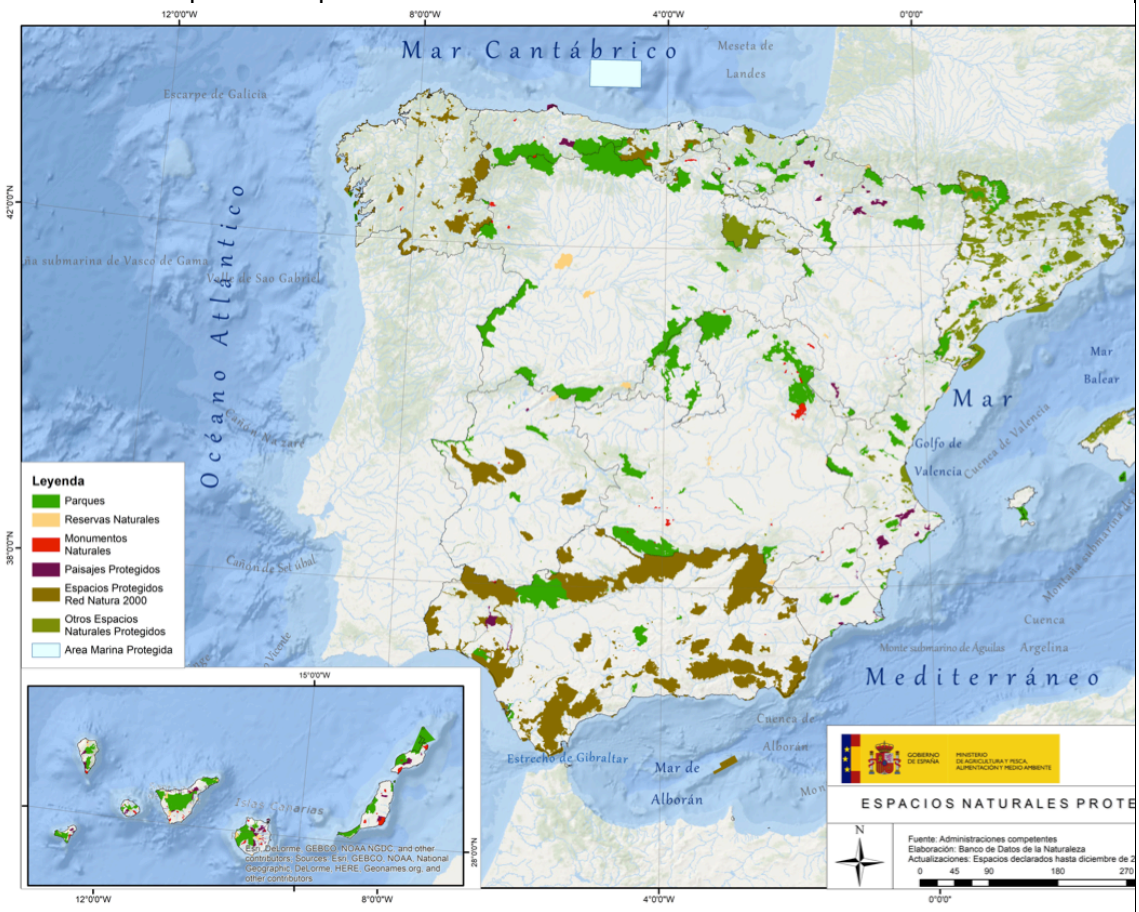
	Indicator
1.4.1	The Biomass Producer has implemented appropriate control systems and procedures to verify that payments for harvest rights and timber, including duties, relevant royalties and taxes related to timber harvesting, are complete and up to date.
Finding	There are two types of fees payable for timber harvesting: 1) taxes imposed by the Autonomous Communities, Regional Councils or Town Councils, on the licences required for the works/harvesting in private forests. Each Autonomous Community regulates this aspect independently. If fees are applicable, authorisation will only be issued after the fees have been paid. In public contracts, there are payments associated with the contact allocation that must be met once the work has been awarded and before it is finally formalised. In all cases the fact of having authorisations or allocations issued by public administrations implies that the corresponding fees have been paid. Therefore, payment of the corresponding fees is certified by holding the following: ▪ Work/harvesting notification ▪ Work/harvesting authorisation ▪ Allocation of public forest works contract 2) VAT linked to transactions and then income tax and/or corporation tax. VAT is paid to the Tax Authorities on a quarterly basis and income tax and/or corporation tax is paid annually. The payment of taxes to the Tax Authorities relating to the purchase of source material is credited through: a) invoice or valid receipt for the purchase of raw material required for the feedstock or the work carried out (bearing in mind that many times self-billing is applied, so it is the purchasing company itself that issues the invoice) b) certificate of being up to date with payments to the Tax Authorities (of the state and the autonomous community) of the company that has purchased the material or carried out the work. Based on the foregoing, the risk related to this indicator is classed as low.
Means of Verification	• Invoices/valid receipts (bearing in mind that many times self-billing is applied, so it is the purchasing company itself that issues the invoice) • Certificate of being up to date with payments to the Tax Authorities, of the state and the autonomous community. • One of the following documents must be available: ✓ Work/harvesting notification. ✓ Work/harvesting authorisation. ✓ Allocation of public forest works contract.
Evidence Reviewed	Basic Regulations VAT Tax Agency : https://www.agenciatributaria.es/AEAT.internet/Inicio/La_Agencia_Tributaria/Normativa/Normativa_tributaria_y_aduanera/Impuestos/Impuesto_sobre_el_valor_anadido__IVA_/Impuesto_sobre_el_valor_anadido__IVA_.shtml Basic Regulations IRPF Tax Agency : https://www.agenciatributaria.es/AEAT.internet/Inicio/La_Agencia_Tributaria/Normativa/Normativa_tributaria_y_aduanera/Impuestos/Impuesto_sobre_la_renta_de_las_personas_fisicas__IRPF_/Normativa_basica_del_IRPF/Normativa_basica_del_IRPF.shtml

	Basic Regulations Corporation Tax Tax Agency : https://www.agenciatributaria.es/AEAT.internet/Inicio/La_Agencia_Tributaria/Normativa/Normativa_tributaria_y_aduanera/Impuestos/Impuesto_sobre_sociedades/Normativa_basica_de_Impuesto_sobre_Sociedades/Normativa_basica_de_Impuesto_sobre_Sociedades.shtml
Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
1.5.1	The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is supplied in compliance with the requirements of CITES.
Finding	The list of CITES species does not include any forest pants produced or grown in Spain. Neither pine or eucalyptus are among the CITES species, Appendix I, II or III. Based on the foregoing, the risk related to this indicator is classed as low.
Means of Verification	• List of species included in the raw material.
Evidence Reviewed	Check list of CITES species: http://checklist.cites.org/#/en Portal de la autoridad administrativa CITES en España: http://www.cites.es/es-ES/Paginas/default.aspx Legislación CITES de aplicación: http://www.cites.es/es-ES/legislacion/Paginas/Legislacion-de-aplicacion.aspx
Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
1.6.1	The Biomass Producer has implemented appropriate control systems and procedures to ensure that feedstock is not sourced from areas where there are violations of traditional or civil rights.
Finding	There is no armed conflict in Spain, nor is the Spanish forestry sector associated with any conflict. Spain is not subject to any UN sanction or ban on timber exports, and there are no persons or entities in the Spanish forestry sector that are sanctioned by the UN. Spain is well ranked in international reports: • Corruption Perceptions Index score of 58. The perception of the level of corruption has increased significantly in Spain in recent years, although it remains clearly above 50, which implies a relatively low level of perception; • World Bank Governance Indicators (WGI), scores for 2017 between 61.90 and 83.17 (1-100 points). The WBGI report has been produced in 200 countries since 1996 and covers the following governance indicators: i) Voice and Accountability, ii) Political Stability and Absence of Violence/Terrorism, iii) Government Effectiveness, iv) Regulatory Quality, v) Rule of Law, and vi) Control of Corruption.

	Although there are some concerns regarding civil rights in Spain reflected in reports from international organisations such as Amnesty International (see the 2017 report of Spain), none of these concerns are directly related to the forestry sector. Spain does not appear in any report from international organisations (Global Witness; Chatham House Illegal Logging portal) regarding illegal timber trade or harvesting. There are no indigenous peoples in Spain who can claim traditional use of lands, forests or other resources on the basis of customary rights or traditional uses. In Spain there are many ancient customary rights linked to the forests of the Iberian Peninsula. There are no relevant conflicts related to these rights and where they exist there are established channels for their management and resolution. Many of these uses have died out due to disuse or they simply exist, but are not exercised and others have been integrated into the management of the forests (public roads, firewood, communal management…). An example of these uses is the Communal Forests, both Roman and Germanic, which have been gradually recovered since the establishment of democracy in 1977. Where communities have been able to demonstrate common use by local residents, they have been declared Neighbourhood Forests. There are Neighbourhood Forest Boards and legislation to regulate their activity. There are many forestry associations or similar groups, at local or regional level, that carry out important work in the recovery or maintenance of customary uses of forests. Labour rights are observed including those specified in the ILO fundamental principles. Spain has ratified the 8 ILO Fundamental Conventions. Based on the foregoing, the risk related to this indicator is classed as low.
Means of Verification	• If there are any traditional rights to the land belonging to local peoples, these are identified. • There are clear procedures and channels in place to resolve any possible conflicts regarding the traditional rights to the land belonging to local peoples
Evidence Reviewed	FSC National Risk Assessment for Spain, FSC-NRA-ES V1-1 ES_2018-09-11: https://ic.fsc.org/en/document-center/id/309 World Bank Governance Indicators, WGI: http://info.worldbank.org/governance/WGI/#reports Transparency international, CORRUPTION PERCEPTIONS INDEX 2018: https://www.transparency.org/cpi2018 Amnistía Internacional España: https://www.es.amnesty.org/en-que-estamos/espana/ Illegal Logging portal: https://www.illegal-logging.info/regions/spain Global Witness: https://www.globalwitness.org/en/ OIT España: http://www.ilo.org/madrid/oit-en-españa/lang--es/index.htm Convenios ILO: http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--es/index.htm Legislación Española Laboral y de la Seguridad Social: https://www.boe.es/legislacion/codigos/codigo.php?id=93&modo=1&nota=0&tab=2
Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
2.1.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that forests and other areas with high conservation values are identified and mapped.
Finding	In Spain, there is a systematic legal framework for the protection of natural spaces and areas with high conservation values: "In accordance with Law 42/2007 on Natural Heritage and Biodiversity, Protected Natural Spaces are considered to be those areas of the national territory, including continental waters and maritime waters under national sovereignty or jurisdiction, including the exclusive economic zone and the continental shelf, that comply with at least one of the following requisites and are declared as such: ▪ Contain systems or natural elements that are representative, unique, fragile, threatened or of special ecological, scientific, landscape, geological or educational interest. ▪ Be especially dedicated to the protection and maintenance of biological diversity, geodiversity and associated natural and cultural resources." There are many types and names, since most of the Autonomous Communities have legislated on this issue: National Parks, Natural Parks, Nature Reserves, Natura 2000 Network Areas, Biosphere Reserves. The protected area in Spain is 13% for natural areas and this increases to 28% if the Natura 2000 Network is included, with Spain being the country that contributes most to the Natura 2000 Network, the main instrument of European conservation policy. The protected areas cover both public and private forests.  Any harvesting activity that may affect rare or endangered species has limitations specified in the harvesting permit. According to the Nature Data Bank of the MITECO:

- Up to June 2018, Andalusia has declared 341 protected areas, both land and marine zones, with the land area subject to protection covering 2,614,899.84 hectares, nearly 30% of its total land area.
- Up to June 2018, the Valencian Community has declared 292 protected areas, both land and marine zones, with the land area subject to protection covering 255,281.90 hectares, nearly 11% of its total land area.
- Up to June 2018, the Region of Murcia has declared 14 protected areas, both land and marine zones, with the land area subject to protection covering 62,104.27 hectares, 5.49% of its total land area.
- Up to June 2018, Castilla La Mancha has declared 111 protected areas, with the land area subject to protection covering 582,929.30 hectares, 7.34% of its total area.
- Up to June 2018, Galicia has declared 98 protected areas, both land and marine zones, with the land area subject to protection covering 359,415.53 hectares, 12.11% of its total land area.
- Up to June 2018, Asturias has declared 54 protected areas, both land and marine zones, with the land area subject to protection covering 235,824.52 hectares, 22.22% of its total land area.
- Up to June 2018, Cantabria has declared 36 protected areas, both land and marine zones, with the land area subject to protection covering 150,991.72 hectares, 28.42% of its total land area.
- Up to June 2018, Euskadi has declared 43 protected areas, both land and marine zones, with the land area subject to protection covering 101,359.22 hectares, 14.04% of its total land area.

At the same time there are high conservation values linked to cultural assets and prehistoric findings. The Iberian Peninsula is an area with a lot of archaeological and prehistoric remains. There is State and Autonomous Community/ Regional and Town Council legislation that protects and catalogues sites of historical and cultural value. In the Autonomous Communities/Regional Councils that require prior authorisation, this already includes any lien on a site of cultural interest and the measures or restrictions necessary regarding the work. In the case of prior communications, if the area is affected by a good of these characteristics, it is necessary to have the relevant authorization from the authorities responsible for cultural and historical heritage. The action process is also legislated in the event that remains appear during the work. In these cases the work must be stopped and the findings must be communicated to the competent administration.

There is a good level of governance and a comprehensive legal framework developed for Spanish protected areas, and a good level of control exercised by the Autonomous Communities/Regional Councils, that are the competent authorities. The Autonomous Communities have a wealth of information both on websites and in viewers and geographic information (GIS) on protected areas and priority ecosystems, habitat, protected wild species that are under threat and that are suitably identified and mapped.

Therefore, the following action guide is established regarding the identification and delimitation of high conservation values:

• For works in public forests, the management services of the Autonomous Communities that are in charge of management have all the necessary information for their identification and mapping. Any limitation to the management related to them is communicated in the award itself.For work on private properties that require prior authorisation to carry out any forestry work/harvesting (Valencian Community, Andalusia, Region of Murcia, Asturias and Regional Councils of the Basque Country), the management services of the Autonomous Communities themselves will carry out the work of identifying and delimiting the attributes of high conservation value in such a way that their presence and the subsequent management limitations are reflected in the authorisation they issue.

- For work on private properties in Galicia and Cantabria, where a felling notification is sufficient for species of rapid growth (there is an associated forestry management plan/model), although the administrations still have control, it is considered necessary for the correct identification and defining of the high conservation values (natural or cultural)

	for Biosilva Agroforestal to check to see if the plot(s) where it is going to work overlap with any high conservation values. Based on the foregoing, the risk related to this indicator is classed as: 1. low for forestry work/harvesting in the Autonomous Communities of Andalusia, the Valencian Community, Region of Murcia, Castilla La Mancha, Asturias and the Basque Country, and in public contracts in Galicia and Cantabria. 2. specified for work on private properties in Galicia and Cantabria.
Means of Verification	• Information available on high conservation values in the GIS viewers of the Autonomous Communities (Natura 2000 Network, Protected Areas, Sites of Cultural Interest) • Existing legal framework. Laws, regulations and control bodies • Forestry work/harvesting authorisation • Necessary permits • Catalogue of sites of cultural interest. GIS viewers • Technical Specifications for the allocation of the public forest works contract.
Evidence Reviewed	Law 42/2007 on Natural Heritage and Biosiversity: http://www.boe.es/diario_boe/txt.php?id=BOE-A-2007-21490 MITECO: • Protected áreas Spain: https://www.miteco.gob.es/es/biodiversidad/temas/espacios-protegidos/espacios-naturales-protegidos/ • Nature Data Bank, Protected Areas of Spain: https://www.miteco.gob.es/es/biodiversidad/servicios/banco-datos-naturaleza/informacion-disponible/ENP_Descargas.aspx#prettyPhoto • Mapo of protected áreas Spain: https://www.miteco.gob.es/es/biodiversidad/servicios/banco-datos-naturaleza/informacion-disponible/ENP_Descargas.aspx#prettyPhoto[pp_gal]/0/ • National Parks GIS layers: https://www.miteco.gob.es/es/red-parques-nacionales/sig/ Law 16/1985, of 25 june, on Spanish Historical Heritage: https://www.boe.es/buscar/pdf/1985/BOE-A-1985-12534-consolidado.pdf Junta de Andalucía: • Network of Protected Areas of Andalucia (RENPA): http://www.juntadeandalucia.es/medioambiente/site/portalweb/menuitem.f497978fb79f8c757163ed105510e1ca/?vgnextoid=007fee9b421f4310VgnVCM2000000624e50aRCRD&vgnextchannel=3bdd61ea5c0f4310VgnVCM1000001325e50aRCRD • Natura 2000 Network: http://www.juntadeandalucia.es/medioambiente/site/portalweb/menuitem.f497978fb79f8c757163ed105510e1ca/?vgnextoid=d2d5f92658274410VgnVCM1000001325e50aRCRD&vgnextchannel=d0e77b32b31f4310VgnVCM1000001325e50aRCRD • RENPA viewer: http://www.juntadeandalucia.es/medioambiente/site/rediam/menuitem.04dc44281e5d53cf8ca78ca731525ea0/?vgnextoid=b2460c33f6959210VgnVCM1000001325e50aRCRD& • Natura 2000 Network viewer (SCIs, SPAs, and SACs) in Andalucia: http://www.juntadeandalucia.es/medioambiente/site/rediam/menuitem.04dc44281e5d53cf8ca78ca731525ea0/?vgnextoid=cf7b1cab5bf59210VgnVCM1000001325e50aRCRD&vgnextchannel=66ffdb27eb364410VgnVCM1000001325e50aRCRD&vgnextfmt=rediam&lr=lang_es • Environmetal Information downloadsl: http://www.juntadeandalucia.es/medioambiente/site/rediam/menuitem.aedc2250f6db83cf8ca78ca731525ea0/?vgnextoid=7b3ba7215670f210VgnVCM1000001325e50aRCRD&lr=lang_es Valencian Community: • Protectec Natural Areas: http://www.agroambient.gva.es/es/web/medio-natural/espacios-naturales-protegidos • Natura 2000 Network: http://www.agroambient.gva.es/web/natura-2000 • Mapping viewer of the Valencian Community: http://visor.gva.es/visor/ Region of Murcia:

	• Protected Natural Areas of the Region of Murcia: http://www.murcianatural.carm.es/web/guest/espacios-naturales-protegidos • OISMA mapping viewer: https://geoportal.imida.es/oisma/ Castilla La Mancha: • List of Protected Natural Areas: http://pagina.jccm.es/medioambiente/espacios_naturales/listado.htm • Protected Areas of Castilla La Mancha: http://areasprotegidas.castillalamancha.es • Mapping Viewer: https://castillalamancha.maps.arcgis.com/apps/webappviewer/index.html?id=9dbc9704759b4e51ad6a405e740b5289 Galicia: • Protected Areas: http://cmaot.xunta.gal/seccion-tema/c/CMAOT_Conservacion?content=Direccion_Xeral_Conservacion_Natureza/Espazos_protexidos/seccion.html&std=presentacion.html • Nature Conservation Viewer: https://mapas.xunta.es/visores/conservaciondanatureza/ • Galicia, forestry harvesting viewer: http://mapas.xunta.gal/visores/aproveitamentos/ • Galicia mapping: https://www.sergas.es/Saude-publica/GIS-Cartografia-Galicia-formato-vectorial-SHP?idioma=es Asturias: • Regional Network of Protected Natural Areas of Asturias (RRENP): http://movil.asturias.es/portal/site/medioambiente/menuitem.4691a4f57147e2c2553cbf10a6108a0c/?vgnextoid=6edf25d1d8375210VgnVCM10000097030a0aRCRD&i18n.http.lang=es • Map of Protected Areas: http://sitpa.cartografia.asturias.es/Geoportal/extlayout.aspx?userId=FZr4XHq0PJA=&lang=es • Environmental Network of Asturias, Natural Areas: https://www.asturias.es/portal/site/medioambiente/menuitem.a9853809264b19f45212678ca6108a0c/?vgnextoid=37ea50c3f2d79110VgnVCM1000006a01a8c0RCRD&i18n.http.lang=es • Environmental Network of Asturias,: https://www.asturias.es/portal/site/medioambiente/menuitem.902b26b36a5e1f63e7cc2a20a6108a0c/?vgnextoid=3cfda5c7be9fa110VgnVCM1000006a01a8c0RCRD&i18n.http.lang=es Cantabria: • Rural Network of Cantabria, Protected Natural Areas: https://redcantabrarural.com/naturea-3/espacios-naturales-protegidos/#EspaciosNaturalesProtegidosCantabria • Cantabria Maps: http://mapas.cantabria.es Euskadi: • Network of Protected Natural Areas: http://www.euskadi.eus/web01-a2ingdib/es/u95aWar/consultaMarcosJSP/U95aSubmitMarcoProteccion.do?&pkMarco=4&tipoEntidad=0&bloqueMarco=300 • Regulations: http://www.euskadi.eus/informacion/legislacion-sobre-patrimonio-natural-y-biodiversidad/web01-a2ingdib/es/ • GeoEuskadi viewer: http://www.geo.euskadi.eus/s69-bisorea/es/x72aGeoeuskadiWAR/index.jsp?def_groups=medio_ambiente&wmsLayers=medio_ambiente-lugares_protegidos#162 • Bizkaia Regional Council, Natural Heritage: http://web.bizkaia.eus/es//-/patrimonio-natural • Araba Regional Council, Natural Parks: http://www.araba.eus/cs/Satellite?c=Page&cid=1193046463565&language=es_ES&pagename=DiputacionAlava%2FPage%2FDPA_listado

	• General Authorities of Guipuzkoa, Landscape and Natural Areas: http://w390w.gipuzkoa.net/WAS/CORP/DJGPortalWEB/territorio_historico_de_gipuzkoa.jsp?id=0408&idioma=es • Guipuzkoa Regional Council, Forests and Protected Natural Areas: https://www.gipuzkoa.eus/es/web/mendiak-eremunaturalak/espacios-naturales-protegidos Royal Decree 139/2011 List of Wild Species under the Special Protection Regime and the Spanish Catalogue of Threatened Species: https://www.boe.es/buscar/pdf/2011/BOE-A-2011-3582-consolidado.pdf Current status of the Lists of Wild Species under the Special Protection Regime and of the Spanish Catalogue of Threatened Species: https://www.miteco.gob.es/es/biodiversidad/temas/conservacion-de-especies/especies-proteccion-especial/ce-proteccion-listado-situacion.aspx Wikipedia protected natural áreas Spain: https://es.wikipedia.org/wiki/Anexo:Espacios_naturales_protegidos_de_España Europarc 2016 yearbook on the state of protected áreas in Spain: http://www.redeuroparc.org/system/files/shared/Publicaciones/Anuario_2016/anuario_2016_europarc-espana.pdf FSC National Risk Assessment for Spain, FSC-NRA-ES V1-1 ES_2018-09-11: https://ic.fsc.org/en/document-center/id/309
Risk Rating	☐ **Low Risk** ☒ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	For work on private properties in Galicia and Cantabria, although the administrations still have control, it is considered necessary for the correct identification and defining of the high conservation values (natural or cultural) for Biosilva Agroforestal to check on the available GIS data viewers to see if the plot(s) where it is going to work overlap with any high conservation values (cross-checking the plot with the data layers on the Natura 2000 network, Protected Natural Areas, Sites of Cultural Interest). If there is an overlap: ✓ the element of high conservation value is identified, ✓ it is noted in the work file, ✓ checks are carried out to see whether or not it exists in the work area.

	Indicator
2.1.2	The Biomass Producer has implemented appropriate control systems and procedures to identify and address potential threats to forests and other areas with high conservation values from forest management activities.
Finding	From the description given in the previous indicator, it can be concluded that there is an effective real framework that allows for the identification and mapping of the high conservation values present. In turn, the report mentioned above produced by COSE (Spanish Confederation of Forest Organisations) and published by MAPA in 2013, indicates that the degree of control exercised by the forest authority is high or very high in all the Autonomous Communities except Galicia, where the control level is considered Medium and Cantabria where it is considered Medium-High. The study concludes that the Spanish regulations and surveillance procedures carried out by the Autonomous Communities are consistent. The Autonomous Communities have their own personnel to carry out the control over the high conservation values, Forestry/Environmental Agents. Within the Civil Guard there is also the SEPRONA unit (Nature Protection Service), which carries out environmental police work. No reports have been published on relevant environmental damage related to forestry work/harvesting. In all cases there is a clear legal framework and effective control by the authorities of any potential threats to the high conservation values.

	With the information above, the following operation guide has been established with regards identifying and addressing potential threats to high conservation values: 1. For works in public forests, the management services of the Autonomous Community have all the information necessary at their disposal, which will be reflected in the work specifications. Any management limitations related to potential threats to high values are specified in the actual allocation. 2. For work on private estates in the Autonomous Communities of Valencia, Andalucía, Murcia, Asturias and Euskadi that require prior authorisation to carry out any forestry work/harvesting, the management services of the Autonomous Communities themselves will carry out the work of identifying possible threats to the high conservation values in such a way that their presence and the subsequent management limitations are reflected in the authorisation they issue. 3. For work on private properties in Galicia and Cantabria, where a felling notification is sufficient for species of rapid growth, although the administrations still have control, it is considered necessary for the correct identification of the potential threats to the high conservation values for Biosilva Agroforestal to check on the available GIS data viewers to see if the plot(s) where it is going to work overlap with any high conservation values. 4. For work not carried out under the responsibility of Biosilva Agroforestal (work carried out by subcontractors is considered to be under the responsibility of Biosilva Agroforestal), i.e., where Biosilva Agroforestal buys the chips, procedures are in place to determine the origin of the raw material and the relevant information on the work is always requested; contract, felling licence, authorisations... The level of control by the Autonomous Communities is maintained. In turn, and given that the control of the work is not directly under the supervision of Biosilva Agroforestal, the company provides its suppliers with clear operating instructions in the event of identifying possible threats to high conservation values and therefore prevents possible threats to the environment or particularly sensitive areas.Based on the foregoing, the risk related to this indicator is classed as: 1. low for forestry work/harvesting in the Autonomous Communities of Andalusia, the Valencian Community, Region of Murcia, Castilla La Mancha, Asturias and the Basque Country, and in public contracts in Galicia and Cantabria. 2. specified for work on private properties in Galicia and Cantabria.
Means of Verification	• Information available on high conservation values in the GIS viewers of the Autonomous Communities (Natura 2000 Network, Protected Areas, Sites of Cultural Interest) • Existing legal framework. Laws, regulations and control bodies • Forestry work/harvesting authorisation • Technical Specifications for the allocation of the public forest works contract • Good environmental practices manual in Sustainable Forest Management. • Listed Protected and threatened species. • Results of the verification audits of Biosilva Agroforestal.
Evidence Reviewed	Law 42/2007 on Natural Heritage and Biosiversity: http://www.boe.es/diario_boe/txt.php?id=BOE-A-2007-21490 MITECO: • Protected Areas of Spain: https://www.miteco.gob.es/es/biodiversidad/temas/espacios-protegidos/espacios-naturales-protegidos/ • Nature Data Bank, Protected Natural Areas of Spain: https://www.miteco.gob.es/es/biodiversidad/servicios/banco-datos-naturaleza/informacion-disponible/ENP_Descargas.aspx#prettyPhoto • Mapa of Protected Areas of Spain: https://www.miteco.gob.es/es/biodiversidad/servicios/banco-datos-naturaleza/informacion-disponible/ENP_Descargas.aspx#prettyPhoto[pp_gal]/0/ • National Parks GIS Layers: https://www.miteco.gob.es/es/red-parques-nacionales/sig/ Law 16/1985, of June 25, on Spanish Historical Heritage: https://www.boe.es/buscar/pdf/1985/BOE-A-1985-12534-consolidado.pdf Junta de Andalucía:

- Network of Protected Areas of Andalucia (RENPA): http://www.juntadeandalucia.es/medioambiente/site/portalweb/menuitem.f497978fb79f8c757163ed105510e1ca/?vgnextoid=007fee9b421f4310VgnVCM2000000624e50aRCRD&vgnextchannel=3bdd61ea5c0f4310VgnVCM1000001325e50aRCRD
- Natura 2000 Network: http://www.juntadeandalucia.es/medioambiente/site/portalweb/menuitem.f497978fb79f8c757163ed105510e1ca/?vgnextoid=d2d5f92658274410VgnVCM1000001325e50aRCRD&vgnextchannel=d0e77b32b31f4310VgnVCM1000001325e50aRCRD
- RENPA viewer: http://www.juntadeandalucia.es/medioambiente/site/rediam/menuitem.04dc44281e5d53cf8ca78ca731525ea0/?vgnextoid=b2460c33f6959210VgnVCM1000001325e50aRCRD&
- Natura 2000 Network viewer (SCIs, SPAs and SACs) in Andalucia: http://www.juntadeandalucia.es/medioambiente/site/rediam/menuitem.04dc44281e5d53cf8ca78ca731525ea0/?vgnextoid=cf7b1cab5bf59210VgnVCM1000001325e50aRCRD&vgnextchannel=66ffdb27eb364410VgnVCM1000001325e50aRCRD&vgnextfmt=rediam&lr=lang_es
- Environmental Information downloads: http://www.juntadeandalucia.es/medioambiente/site/rediam/menuitem.aedc2250f6db83cf8ca78ca731525ea0/?vgnextoid=7b3ba7215670f210VgnVCM1000001325e50aRCRD&lr=lang_es

Valencian Community:

- Protected Natural Areas: http://www.agroambient.gva.es/es/web/medio-natural/espacios-naturales-protegidos
- Natura 2000 Network: http://www.agroambient.gva.es/web/natura-2000
- Mapping viewer of the Valencian Community: http://visor.gva.es/visor/

Region of Murcia:

- Protected Natural Areas of the Region of Murcia: http://www.murcianatural.carm.es/web/guest/espacios-naturales-protegidos
- OISMA Mapping viewer: https://geoportal.imida.es/oisma/

Castilla La Mancha:

- List of Protected Natural Areas: http://pagina.jccm.es/medioambiente/espacios_naturales/listado.htm
- Protected Areas of Castilla La Mancha: http://areasprotegidas.castillalamancha.es
- Mapping Viewer: https://castillalamancha.maps.arcgis.com/apps/webappviewer/index.html?id=9dbc9704759b4e51ad6a405e740b5289

Galicia:

- Protected Areas: http://cmaot.xunta.gal/seccion-tema/c/CMAOT_Conservacion?content=Direccion_Xeral_Conservacion_Natureza/Espazos_protexidos/seccion.html&std=presentacion.html
- Nature Conservation Viewer: https://mapas.xunta.es/visores/conservaciondanatureza/
- Galicia, forestry harvesting viewer: http://mapas.xunta.gal/visores/aproveitamentos/
- Galicia mapping: https://www.sergas.es/Saude-publica/GIS-Cartografia-Galicia-formato-vectorial-SHP?idioma=es
- DECREE 50/2014 Harvesting: https://www.xunta.gal/dog/Publicados/2014/20140507/AnuncioG0165-250414-0004_es.html

Asturias:

- Regional Network of Protected Natural Areas of Asturias (RRENP): http://movil.asturias.es/portal/site/medioambiente/menuitem.4691a4f57147e2c2553cbf10a6108a0c/?vgnextoid=6edf25d1d8375210VgnVCM10000097030a0aRCRD&i18n.http.lang=es
- Map of Protected Areas: http://sitpa.cartografia.asturias.es/Geoportal/extlayout.aspx?userId=FZr4XHq0PJA=&lang=es

	• Environmental Network of Asturias, Natural Areas: https://www.asturias.es/portal/site/medioambiente/menuitem.a9853809264b19f45212678ca6108a0c/?vgnextoid=37ea50c3f2d79110VgnVCM1000006a01a8c0RCRD&i18n.http.lang=es • Environmental Network of Asturias,: https://www.asturias.es/portal/site/medioambiente/menuitem.902b26b36a5e1f63e7cc2a20a6108a0c/?vgnextoid=3cfda5c7be9fa110VgnVCM1000006a01a8c0RCRD&i18n.http.lang=es Cantabria: • Rural Network of Cantabria, Protected Natural Areas: https://redcantabrarural.com/naturea-3/espacios-naturales-protegidos/#EspaciosNaturalesProtegidosCantabria • Cantabria Maps: http://mapas.cantabria.es Euskadi: • Network of Protected Natural Areas: http://www.euskadi.eus/web01-a2ingdib/es/u95aWar/consultaMarcosJSP/U95aSubmitMarcoProteccion.do?&pkMarco=4&tipoEntidad=0&bloqueMarco=300 • Regulations: http://www.euskadi.eus/informacion/legislacion-sobre-patrimonio-natural-y-biodiversidad/web01-a2ingdib/es/ • GeoEuskadi viewer: http://www.geo.euskadi.eus/s69-bisorea/es/x72aGeoeuskadiWAR/index.jsp?def_groups=medio_ambiente&wmsLayers=medio_ambiente-lugares_protegidos#162 • Bizkaia Regional Council, Natural Heritage: http://web.bizkaia.eus/es//-/patrimonio-natural • Araba Regional Council, Natural Parks: http://www.araba.eus/cs/Satellite?c=Page&cid=1193046463565&language=es_ES&pagename=DiputacionAlava%2FPage%2FDPA_listado • General Authorities of Guipuzkoa, Landscape and Natural Areas: http://w390w.gipuzkoa.net/WAS/CORP/DJGPortalWEB/territorio_historico_de_gipuzkoa.jsp?id=0408&idioma=es • Guipuzkoa Regional Council, Forests and Protected Natural Areas: https://www.gipuzkoa.eus/es/web/mendiak-eremunaturalak/espacios-naturales-protegidos Royal Decree 139/2011 List of Wild Species under the Special Protection Regime and the Spanish Catalogue of Threatened Species: https://www.boe.es/buscar/pdf/2011/BOE-A-2011-3582-consolidado.pdf Current status of the Lists of Wild Species under the Special Protection Regime and of the Spanish Catalogue of Threatened Species: https://www.miteco.gob.es/es/biodiversidad/temas/conservacion-de-especies/especies-proteccion-especial/ce-proteccion-listado-situacion.aspx Wikipedia, protected natural areas of Spain: https://es.wikipedia.org/wiki/Anexo:Espacios_naturales_protegidos_de_España Europarc 2016 yearbook on the state of protected areas en Spain: http://www.redeuroparc.org/system/files/shared/Publicaciones/Anuario_2016/anuario_2016_europarc-espana.pdf FSC National Risk Assessment for Spain, FSC-NRA-ES V1-1 ES_2018-09-11: https://ic.fsc.org/en/document-center/id/309 Study on wood control procedures and risk assessment in each Autonomous Community for the application of the Due Diligence System: https://www.mapa.gob.es/es/desarrollo-rural/temas/politica-forestal/control_cortas_de_madera_espanya_2012_tcm30-152390.pdf
Risk Rating	☐ **Low Risk** ☒ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	For work on private properties in Galicia and Cantabria, for the correct identification and correction of threats to high conservation values (natural or cultural), the following methodology is considered necessary (to be completed before the forestry work/exploitation is carried out):

	4. Biosilva Agroforestal must check on the available GIS data viewers to see if the plot(s) where it is going to work overlap with any high conservation values. c. If there is no overlap, the work can go ahead with no need for any additional mitigation measures. d. If there is an overlap: ✓ the element of high conservation value is identified, ✓ it is noted in the work file, 5. check whether or not it exists in the work area, c. If it does not, the work can go ahead with no need for any additional mitigation measures. d. If it does exist in the work area: 6. The Forestry Management Technical Plan will be implemented for the area under work, determining the possible threats (if existing) of the management activities to the protected element. a. If no threats to the protected elements are identified, the work can go ahead with no need for any additional mitigation measures. b. If any threats are identified, a field visit is carried out prior to starting the work, establishing the corresponding limitations to be applied to the work to avoid any damage to the High Value elements from the threats detected. In turn, at the end of the work, another visit will be made to check that the protected element has not been affected. All of this is duly documented in the work file and included in the corresponding Forestry Management Technical Plan. Biosilva Agroforestal has the appropriate technical means to check that the sites where it is going to work are fully cross-checked with any relevant element of high conservation values and to determine any possible threats (available GIS data viewers of the Autonomous Communities: Natura 2000 Network, Protected Natural Areas, Sites of Cultural Interest) and appropriate procedures to deal with these possible threats, including the training of its own workers as well as the workers of its subcontractors. In addition, Biosilva Agroforestal also has appropriate procedures in place (CoC FSC certification) to ensure that this information reaches its chip suppliers (primary feedstock) so that it is taken into account in the work to be carried out.

	Indicator
2.1.3	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not sourced from forests converted to production plantation forest or non-forest lands after January 2008.
Finding	<u>Conversion from forest to plantation:</u> This is a situation (short of an indigenous mass and the planting of fast-growing species in intensive management) that can theoretically occur within the scope of this Supply base on private properties in Galicia, Asturias, Cantabria, Euskadi and Andalusia linked to the plantation species. However, it is an action that is normally forbidden by law and, in any case, always subject to administrative control. The raw material to be used as SBP compliant does not include material from conversions of native masses to eucalyptus plantations,for harvesting work carried out on private plots in Galicia, Biosilva Agroforestal will review orthophotos from prior to 2008 to check that it was not populated by a mass of consolidated native hardwood species. <u>Andalucía</u>: The Junta de Andalucía includes eucalyptus as an invasive alien in the Andalusian Programme for the Control of Invasive Alien Species. Since 1992 measures have been taken to approach the task of recovering areas of public forests occupied by eucalyptus plantations. Since that year,

eucalyptus has not been used in reforestation in public forests and thousands of hectares of eucalyptus trees have been recovered in public forests in Andalucía.
In addition, the area of eucalyptus trees in the province of Huelva, the area with the largest plantations, has been reduced since 1989 from 234,000 ha to 140,000. Furthermore, the Huelva pulp mill, the first destination for the wood of this species, has closed. If we add to all this the high level of control over operations in the natural environments of the Junta de Andalucía, we can rule out the existence of transformations of relevant substitution of native species with eucalyptus since 2008 in Andalucía.

Cantabrian Cornice: Galicia, Asturias, Cantabria and the Basque Country:

The most problematic situation is in Galicia where it is clear that, with the data reporting the increase in the area of eucalyptus trees in the last 20 years, there are both legal and illegal transformations to this species. However, the area that comes from native hardwood cuts, although it exists, does not appear to be relevant. All the data on the Galician areas checked indicate that the surface areas of native hardwood are also increasing in Galicia.
The legislation (Forestry Law of Galicia) establishes in article 67 that "*reforestation and new interspersed plantations with the genus Eucalyptus are forbidden in those areas populated by species listed in annex 1, including after harvesting or when affected by a forest fire. This prohibition is not applicable in cases of subsequent regeneration of the plantation or regeneration, in the shrub layer or undergrowth, of species listed in annex 1*." Therefore, it is against the law to undertake these transformations with fines established for offenders.
There is no reference to any similar problems associated with the *Pinus radiata* in Galicia.

In Asturias, Cantabria and the Basque Country, to a lesser extent, a situation similar to that of Galicia may occur, as the surface area of eucalyptus has increased, especially in coastal areas. However, there is no evidence that the surface area from native hardwood cuts is significant, as there is legislation in place (Article 42 of the Forestry Law of Asturias,…) and sufficient administrative control.

Change from forest to non-forest use.

The authorisation of changes in forest use is regulated at state level by Law 43/2003 on Forestry, amended by Laws 10/2006, of 28 April and 21/2015, of 20 July, which states in article 40, on Change in forest use and modification of vegetation cover: "*The change in forest use of a forest when it is not brought about by reasons for general interest, and without prejudice to the provisions of article 18.4 and the applicable environmental regulations, shall be exceptional and shall require a favourable report from the competent forestry body and, where applicable, from the owner of the forest.*"
Article 6 of this Law also defines the concept of change in forest use as: "*any material action of administrative act that causes the forest to lose its character as such*".
Therefore, this is an exceptional situation that requires the express authorisation of the competent authorities. Normally, the change to agricultural use can be authorised in those areas that have had a previous agricultural use, in a period of 10-30 years. For other types of changes, they are only authorised in the case of special public interest.
This is something that does not affect the type of forest, consolidated arboreal masses, in which Biosilva Agroforestal works. In addition, Biosilva Agroforestal has not worked on any clearcutting operations, which will be the practice linked to this type of conversion.
Even so, it should be noted that the material from felling carried out for conversions from forest to non-forest use, cannot be included in the SBP feedstock.

Andalucía:

In the regulation of Andalucía, changes of use are regulated by Law 2/1992, of 15 June, Forestry of Andalucía, which states in article 69: "*The change of use of forest land for agricultural crops or other forest crops shall require authorisation from the Forestry Administration, regardless of the ownership situation of the land, without prejudice to other required authorisations or licences*".

public information is available on the transformations that have been authorised by province since 2006 (http://www.juntadeandalucia.es/medioambiente/site/portalweb/menuitem.7e1cf46ddf59bb227a9ebe205510e1ca/?vgnextoid=e8a36e8366862510VgnVCM2000000624e50aRCRD&vgnextchannel=8b0b6e8366862510VgnVCM2000000624e50aRCRD)

Valencian Community:

In turn, in the Valencian Community, changes in use from forestry to agriculture must be authorised by the Directorate General for the Natural Environment. Public information is available on the authorised transformations with an area of 1200 ha (http://www.agroambient.gva.es/es/web/medio-natural/cartografia-forestal).

Murcia:

In the same way in Murcia, the clearing of forest land, outside protected natural areas, for agricultural use requires approval from the Directorate General for the Natural Environment. There is a specific application form for this (https://www.carm.es/web/pagina?IDCONTENIDO=7122&IDTIPO=240&TASAS=S&RASTRO=c672$m2469#informacionTasas).

Castilla La Mancha:

As with in the rest of the Autonomous Communities, this transformation requires approval from the General Directorate of Natural Areas and Forestry Policy. There is a specific form listing the documentation to be submitted, for continuous or very close areas of over 5 hectares, a project signed by the competent engineer that contains, as a minimum, the forestry study, study of crops to introduce, financial study and environmental impact study
https://www.jccm.es/tramitesygestiones/transformacion-en-agricola-de-un-terreno-forestal-en-regimen-general

Galicia

In Galicia, changes of use from forestry to agricultural must be reported or authorised to/by the Department of Rural Environment. The transformation of forests into agricultural plots or pastures has increased over the last decade, either in livestock farms that need to have more fodder for the livestock in view of the price increase in animal feed, or in wine-producing areas, for example.
The Forestry Law of Galicia of 2012 simplified the procedures and requirements for converting forest land into agricultural land (being much stricter if converting in the opposite direction) under a number of conditions. Depending on the surface area of the conversion and the type of species planted in the forest, a simple notification is sufficient (which requires an environmental impact report for the Department of the Environment) or requires prior authorisation in order for it to be carried out.
Even so, the overall data indicates that Galicia is still losing agricultural land. The latest Survey on the structure of agricultural holdings, with data from 2013, reveals that the Galician agricultural sector has lost 69,104 hectares of agricultural land. Barely 20% of the Galician region is used for agricultural purposes.

Asturias

In Asturias, article 42 of the Forestry Law states that changes in the use of forests for agricultural crops will always require express authorisation from the competent forestry department. The granting of such authorisation will require prior verification, through the appropriate studies and analyses, that the actions to be carried out are compatible with the provisions of the forest planning and management instruments and do not have negative effects on the physical and natural environment or on the other forest interests under protection. These studies will be produced by

	the entity applying for authorisation in accordance with the instructions of the competent forestry department when the action is to be carried out in an area of more than ten hectares. Cantabria In the case of Cantabria, since it does not have its own Forestry Law, the provisions of the State Forestry Law, Law 43/2003, are applied. Article 40.1 of this law establishes that a change from forestry use which is not based on reasons of general interest, and notwithstanding the provisions of article 18.4 and of the applicable environmental regulations, shall be exceptional and shall require an approval report from the competent forestry body and, where appropriate, from the owner of the forest. Euskadi: In Euskadi each Provincial Council legislates on this matter. In the case of the Provincial Council of Guipuzkoa, article 68 of Provincial Regulation 7/2006 on forests states that the procedures set out in article 30.2 for a change of use in catalogued forests will be followed for occupations and uses. In these cases, failure by the Forestry Administration to respond within the stated time limit will be understood as rejection of the application. In the cases of non-catalogued forests, the interested party must apply for the appropriate authorisation, submitting a report justifying the change of use, that provides the Forestry Administration with the necessary criteria to avoid, mitigate or control any possible negative effects on the forest resulting from the proposed action. In the case of the Provincial Council of Bizkaia article 73 of its Provincial Regulation 3/2007 establishes that, in general, a change in forest use for reasons of general interest or for another public use, may be made, notwithstanding the provisions of environmental legislation. In other cases, the change of forest use shall be exceptional and shall require authorisation from the Provincial Department of Agriculture and from the owner of the forest. For non-catalogued or public forests, the interested party must submit a project produced by a competent engineer and approved by the corresponding Association, along with the corresponding Environmental Impact Study, justifying the suitability of the land for the proposed use. The requested change will be denied when, due to the gradient, type of soil or other reasons, there is a danger of erosion or a decrease in the quality of the land and/or a negative effect on the water quality or system. In the case of the Provincial Council of Araba, article 47 of Provincial Regulation 11/2007 states that, in general, the breaking up of the previous vegetation cover and the ploughing of the land, for agricultural or pasture cultivation, may be admitted, in principle, as a temporary change of use, taking into account the environmentally sustainable nature and landscape of the forests. In order for authorisation to be granted for ploughing, the soil must remain in good condition, with no danger of erosion, displacement or loss of fertility. Only in exceptional cases may the clearing of natural or naturalised forests or protected forests be authorised. It is therefore concluded that there is a clear legal framework that regulates both the transformations of native mass to plantation (prohibition), and those of forest land to non-forest (prior authorization). Therefore the risk related to this indicator is classified as low.
Means of Verification	• Review of orthophotos from flights prior to 2008. • Existing legal framework. Laws, regulations and control bodies • Forestry work/harvesting authorisation • Cartography available and consultation with the competent bodies of the Autonomous Communities regarding transformations • Management Plan, development project • Signed agreements and contracts
Evidence Reviewed	Forestry Law consolidated text (Forestry Law 43/2003 amended by Laws 10/2006, of 28 April and 21/2015, of 20 July): https://www.boe.es/buscar/act.php?id=BOE-A-2003-21339

	Law 2/1992, of 15 June, Forestry law of Andalucía: https://www.boe.es/buscar/act.php?id=BOE-A-1992-15996 Removal of eucalyptus trees in public forests, Junta de Andalucía: http://www.juntadeandalucia.es/medioambiente/site/portalweb/menuitem.7e1cf46ddf59bb227a9ebe205510e1ca?vgnextoid=4cb4453f8678a210VgnVCM2000000624e50aRCRD&vgnextchannel=c192af8569fb5310VgnVCM2000000624e50aRCRD Law 5/2014, of 25 July, of the Generalitat, on Land Use Planning, Urban Planning and Landscape, of the Valencian Community, consolidated text: https://www.boe.es/buscar/pdf/2014/BOE-A-2014-9625-consolidado.pdf Law 3/1993, of 9 December, of the Generalitat Valenciana, Forestry Law of the Valencian Community consolidated text: http://www.dogv.gva.es/auto/dogv/docvpub/rlgv/1993/L_1993_03_ca_L_2017_21.pdf Cartography and database of agricultural transformations of forest areas of the Valencian Communityhttp://www.agroambient.gva.es/documents/20551003/162281880/Manual+cartograf%C3%ADa+Transformaciones_V9+Junio+2017.pdf/4c435927-8743-43e1-aace-db6a4ee083f8 Law 8/2014 on Tax Measures, Administrative Simplification and Civil Service, Region of Murcia: https://www.boe.es/boe/dias/2014/12/23/pdfs/BOE-A-2014-13369.pdfhttp://lospiesenlatierra.laverdad.es/blog/3337-100000-euros-por-roturar-un-monte-en-totana.html Ley 3/2008, de 12 de junio, de Montes y Gestión Forestal Sostenible de Castilla-La Mancha: https://www.boe.es/buscar/act.php?id=BOE-A-2008-13685&p=20091223&tn=2 Castilla La Mancha: https://www.jccm.es/tramitesygestiones/transformacion-en-agricola-de-un-terreno-forestal-en-regimen-general Ley 7/2017 de Montes de Galicia, texto consolidado: https://www.boe.es/buscar/pdf/2012/BOE-A-2012-11414-consolidado.pdf Ley 2/2016 del suelo de Galicia, texto consolidado: https://www.boe.es/buscar/pdf/2016/BOE-A-2016-3191-consolidado.pdf Ley 3/2004, de 23 de noviembre, de montes y ordenación forestal de Asturies: https://www.boe.es/buscar/pdf/2005/BOE-A-2005-393-consolidado.pdf Código de Urbanismo de Asturias: https://www.boe.es/legislacion/codigos/codigo.php?id=26&modo=1&nota=0 Normativa, Dirección General del Medio Natural, Cantabria: http://dgmontes.org/normativa Principal legislación forestal, PEFC Euskadi: http://www.pefceuskadi.org/normativa-forestal/principal-legislacion-forestal-en-la-capv.html# Norma Foral Montes Bizkaia: http://www.bizkaia.eus/lehendakaritza/Bao_bob/2007/03/20070328a062.pdf?hash=ae5851ea071e2972507a0f4a7e971fe9#page=3 Norma Foral Montes Guipuzkoa: http://www4.gipuzkoa.net/ogasuna/normativa/docs/0000785c.pdf Norma Foral Montes Araba: https://www.araba.eus/botha/Boletines/2007/044/2007_044_02377.pdf
Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
2.2.1	The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them.
Finding	According to the legislation in force, at both national and regional level, forestry activities with certain characteristics and of a certain size, must have an environmental impact report prior to applying for a licence (opening of tracks, reforestation of a certain entity…). The environmental impacts of harvesting activities on the land or watercourses are well regulated in Spanish legislation. The Autonomous Communities have their own personnel to carry out the control tasks. Within the Civil Guard there is also the SEPRONA unit (Nature Protection Service), which carries out environmental police work. No reports have been published on relevant environmental damage related to forestry work/harvesting. In addition, Biosilva Agroforestal has a system implemented with the following elements in order to minimise the possible impacts of the works: ✓ Manual of good environmental practices, recommended conduct for its own workers and workers from subcontracted companies ✓ Manual of operating practices of the occupational risk prevention system ✓ Code of good environmental practices in Sustainable Forest Management ✓ When Biosilva Agroforestal buys chips from other suppliers, and therefore the work in the forest is not under its control, under contract it obliges the supplier to provide its Manual of Good Environmental and Forestry Practices and to follow it and implement it in the work to be carried out. Based on the foregoing, the risk related to this indicator is classed as low.
Means of Verification	• Existing legal framework. Laws, regulations and control bodies. • Technical specifications for the award of the contract for work in public forests • Action project, if applicable • Environmental assessment report, if available • Manual of good environmental practices • Manual of good forestry practices • Contracts with suppliers • Information received from suppliers on the environmental assessment of the work • Assessment of potential impacts at site level. • Assessment of measures taken to minimise impacts • Monitoring results
Evidence Reviewed	Environmental Assessment legislation: http://www.mapama.gob.es/es/calidad-y-evaluacion-ambiental/temas/evaluacion-ambiental/legislacion/ Law 21/2013 on Environmental Assessment: http://www.mapama.gob.es/es/calidad-y-evaluacion-ambiental/temas/evaluacion-ambiental/Ley%20%2021%202013%20de%20Evaluacion%20Ambiental_tcm30-190698.pdf Guides and directives for environmental assessment: http://www.mapama.gob.es/es/calidad-y-evaluacion-ambiental/temas/evaluacion-ambiental/guias-directrices/ Spanish Association of Environmental Assessment: • Spanish association of environmental impact assessment http://www.eia.es • National legislation: http://www.eia.es/nacional/ • Autonomous Community legislation: http://www.eia.es/autonomica/
Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**

Comment or Mitigation Measure	

	Indicator
2.2.2	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b).
Finding	The biggest problem facing Spanish soils is desertification. Soil erosion is one of the determining factors in the progress of desertification in Spain and constitutes an environmental problem of special relevance in most of the Mediterranean area. According to the Map of Erosive Soil States (1987-2001) which uses the USLE_USDA methodology, the soil formation process reaches a variable rate of between 2 and 12 tonnes per hectare per year. However, 24% of the national territory (12,382,984 ha) loses more than 12 tonnes per hectare per year and 12.3% (6,217,830 ha) at a rate of more than 50 tonnes per hectare per year. These six million hectares with severe erosive processes are mostly located within the hydrographic basins of the Mediterranean-continental climate, mainly in the basins of the South, Guadalquivir, Ebro, Tagus and Júcar. The annual soil loss in Spain is deemed to be more than 1,200 million tonnes. 27% of these losses occur in forest areas (334 million tonnes), and the remainder occur within agricultural land (887 million tonnes). Given that forest use exceeds agricultural use in terms of area, it is clear that the highest unit rates of erosion occur in areas used for agricultural crops. In the forestry sector, the greatest loss of soil occurs in the area occupied by shrubs and bushes (19.1 tonnes per hectare per year) and in wasteland, areas with scattered scrub and sparsely wooded areas (FCC<20%), with an average of 17.5 tonnes per hectare per year. BIOSILVA AGROFORESTAL carries out work to improve forest cover or forest use. According to the information above, it can be established that forestry work does not damage the soil significantly and that, within the framework of sustained forest management and with appropriate environmental and forest management procedures, no significant damage to the soil is to be expected. In addition, the areas most affected by soil loss (Mediterranean area) are those where the level of control by the competent administrations is highest, according to the report produced by COSE and published by MAPA in 2013. Of the work that produces forestry biomass for Biosilva, the only aspect considered to be conflictive in terms of risk for the soil, is eucalyptus clearcutting in Andalusia (only Mediterranean zone of the scope with a significant presence of this species) in areas with a gradient of over 30%. Based on the foregoing, the risk related to this indicator is classified as: 1. low for forestry work/harvesting in pine forests, and in eucalyptus plantations in Andalusia with gradients of below 30% 2. specified in clearcut harvests in eucalyptus plantations in Andalusia with gradients of over 30%
Means of Verification	• Existing legal framework. Laws, regulations and control bodies • Available maps on the risk of erosion and desertification • Code of Good Environmental Practices • Good Environmental Practices in Sustainable Forest Management
Evidence Reviewed	L Forestry Law consolidated text (Forestry Law 43/2003 amended by Laws 10/2006, of 28 April and 21/2015, of 20 July): https://www.boe.es/buscar/act.php?id=BOE-A-2003-21339 Law 2/1992, of 15 June, Forestry law of Andalucía: https://www.boe.es/buscar/act.php?id=BOE-A-1992-15996

	Law 3/1993, of 9 December, of the Generalitat Valenciana, Forestry Law of the Valencian Community consolidated text http://www.dogv.gva.es/auto/dogv/docvpub/rlgv/1993/L_1993_03_ca_L_2017_21.pdf Law 3/2008, of June 12, on Forests and Sustainable Forestry Management of Castilla-La Mancha: https://www.boe.es/buscar/act.php?id=BOE-A-2008-13685&p=20091223&tn=2 Law 7/2017 on Forests of Galicia, consolidated text: https://www.boe.es/buscar/pdf/2012/BOE-A-2012-11414-consolidado.pdf Law 3/2004, of November 23, on forests and forestry planning of Asturias: https://www.boe.es/buscar/pdf/2005/BOE-A-2005-393-consolidado.pdf Regulations, General Directorate of the Environment, Cantabria: http://dgmontes.org/normativa Provincial Forestry Regulations Bizkaia: http://www.bizkaia.eus/lehendakaritza/Bao_bob/2007/03/20070328a062.pdf?hash=ae5851ea071e2972507a0f4a7e971fe9#page=3 Provincial Forestry Regulations Guipuzkoa: http://www4.gipuzkoa.net/ogasuna/normativa/docs/0000785c.pdf Provincial Forestry Regulations Araba: https://www.araba.eus/botha/Boletines/2007/044/2007_044_02377.pdf MAPAMA: National Inventory of Soil Erosion (INES): https://www.mapa.gob.es/es/desarrollo-rural/temas/politica-forestal/inventario-cartografia/inventario-nacional-erosion-suelos/ MAPAMA, National Action Programme against Desertification (PAND): https://www.mapa.gob.es/es/desarrollo-rural/temas/politica-forestal/desertificacion-restauracion-forestal/lucha-contra-la-desertificacion/lch_pand_descargas.aspx Spanish Society of Forest Sciences: • Report on the situation of forests and the forestry sector in Spain 2013 (ISFE) (http://secforestales.org/content/informe-isfe) • ISFE 2017 Progress Report
Risk Rating	☐ **Low Risk** ☒ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	In eucalyptus harvests in Andalusia, the Government of Andalusia usually limits the work in the felling licence to avoid any risk to the quality and structure of the soil. Specifically, one of the measures that is usually established in sloping areas is the prohibition of removing the stumps in order to ensure the grip of the land. In all circumstances, for biomass from the clearcutting of eucalyptus trees on gradients of over 30%, Biosilva carries out field visits to make sure that all the specifications/limitations established in the felling licence have been followed and that the soil has not been damaged. With regards Biosilva's methods used for work that is not carried out under its responsibility, i.e., where Biosilva buys the wood or chips, it has procedures in place to identify the origin of the feedstock and always asks for the relevant information concerning the work; contract, felling licence, permits... prior to purchasing the material. Biosilva has a system in place to evaluate suppliers to register them on its system so it can work with them. Once the supplier has passed this stage and been certified to ensure it complies with the general procedures, the relevant documentation is requested for each harvest from which the wood is taken to provide the feedstock sold to Biosilva. It is at this point that Biosilva undertakes the necessary checks to make sure that in areas with gradients of over 30% the limitations established in the permits are followed and to ensure that there is no significant impact on the soil, its quality and structure during the work. Biosilva goes to visit the forestry works while they are being carried out. Biosilva also has a Manual of Good Forestry Practices, which focuses on aspects such as preserving the ecosystem, caring for the soil, reducing the risk of fire, waste management, etc. Biosilva issues this Manual to its supplier companies before starting the forestry work and then supervises the degree of compliance with the good practices listed.

	Indicator
2.2.3	The Biomass Producer has implemented appropriate control systems and procedures to ensure that key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).
Finding	As stated in indicators 2.1.1. and 2.1.2., in Spain, there is a systematic legal framework for the protection of natural spaces and areas with high conservation values: "In accordance with Law 42/2007 on Natural Heritage and Biodiversity, Protected Natural Spaces are considered to be those areas of the national territory, including continental waters and maritime waters under national sovereignty or jurisdiction, including the exclusive economic zone and the continental shelf, that comply with at least one of the following requisites and are declared as such: ▪ Contain systems or natural elements that are representative, unique, fragile, threatened or of special ecological, scientific, landscape, geological or educational interest. ▪ Be especially dedicated to the protection and maintenance of biological diversity, geodiversity and associated natural and cultural resources." There are many types and names, since most of the Autonomous Communities have legislated on this issue: National Parks, Natural Parks, Nature Reserves, Natura 2000 Network Areas, Biosphere Reserves... The protected area in Spain is 13% for natural areas and this increases to 28% if the Natura 2000 Network is included, with Spain being the country that contributes most to the Natura 2000 Network, the main instrument of European conservation policy. The protected areas cover both public and private forests. There is a good level of governance and a comprehensive legal framework developed for Spanish protected areas. In turn, the report mentioned above produced by COSE (Spanish Confederation of Forest Organisations) and published by MAPA in 2013, indicates that the degree of control exercised by the forest authority is high or very high in all the Autonomous Communities except Galicia, where the control level is considered Medium and Cantabria where it is considered Medium-High. The study concludes that Spanish regulations and surveillance procedures carried out by the Autonomous Communities are consistent. The Autonomous Communities have their own staff to control the high conservation values, Forest / Environmental Agents. In turn, the SEPRONA (Nature Protection Service) that carries out environmental police work exists within the Civil Guard. There are no published reports on relevant environmental damage linked to forestry work / harvesting activities. In all cases there is a clear legal framework and effective control by the authorities of potential threats to high conservation values. Any harvesting activity that may affect rare or endangered species has limitations specified in the harvesting permit. In turn, the Autonomous Communities have a wealth of information both on websites and in viewers and geographic information (GIS) on protected areas, priority ecosystems and habitat (Natura 2000 Network). With all this information, the risk related to this indicator is classed as low.
Means of Verification	• Information available on high conservation values in the GIS viewers of the Autonomous Communities (Natura 2000 Network, Protected Areas, Sites of Cultural Interest) • Existing legal framework. Laws, regulations and control bodies • Forestry work/harvesting authorisation • Technical Specifications for the allocation of the public forest works contract • Code of Good Environmental Practices • Good Environmental Practices in Sustainable Forest Management. • Results of the verification audits of Biosilva Agroforestal.
Evidence Reviewed	Law 42/2007 on Natural Heritage and Biodiversity: http://www.boe.es/diario_boe/txt.php?id=BOE-A-2007-21490 MAPAMA: • Protected areas Spain: http://www.mapama.gob.es/es/biodiversidad/temas/espacios-protegidos/espacios-naturales-protegidos/ • Map of protected areas Spain: http://www.mapama.gob.es/es/biodiversidad/servicios/banco-datos-naturaleza/enp_2017_tcm30-195782.pdf • National Parks GIS layers: http://www.mapama.gob.es/es/red-parques-nacionales/sig/

	Junta de Andalucía: • Network of Protected Areas of Andalucía (RENPA): http://www.juntadeandalucia.es/medioambiente/site/portalweb/menuitem.f497978fb79f8c757163ed105510e1ca/?vgnextoid=007fee9b421f4310VgnVCM2000000624e50aRCRD&vgnextchannel=3bdd61ea5c0f4310VgnVCM1000001325e50aRCRD • Natura 2000 Network: http://www.juntadeandalucia.es/medioambiente/site/portalweb/menuitem.f497978fb79f8c757163ed105510e1ca/?vgnextoid=d2d5f92658274410VgnVCM1000001325e50aRCRD&vgnextchannel=d0e77b32b31f4310VgnVCM1000001325e50aRCRD • RENPA viewer: http://www.juntadeandalucia.es/medioambiente/site/rediam/menuitem.04dc44281e5d53cf8ca78ca731525ea0/?vgnextoid=b2460c33f6959210VgnVCM1000001325e50aRCRD& • Natura 2000 Network viewer (SCIs, SPAs and SACs) in Andalucía: http://www.juntadeandalucia.es/medioambiente/site/rediam/menuitem.04dc44281e5d53cf8ca78ca731525ea0/?vgnextoid=cf7b1cab5bf59210VgnVCM1000001325e50aRCRD&vgnextchannel=66ffdb27eb364410VgnVCM1000001325e50aRCRD&vgnextfmt=rediam&lr=lang_es • Environmental Information downloads: http://www.juntadeandalucia.es/medioambiente/site/rediam/menuitem.aedc2250f6db83cf8ca78ca731525ea0/?vgnextoid=7b3ba7215670f210VgnVCM1000001325e50aRCRD&lr=lang_es Valencian Community: • Protected Natural Areas: http://www.agroambient.gva.es/es/web/medio-natural/espacios-naturales-protegidos • Natura 2000 Network: http://www.agroambient.gva.es/web/natura-2000 • Mapping viewer of the Valencian Community: http://visor.gva.es/visor/ Region of Murcia: • Protected Natural Areas of the Region of Murcia: http://www.murcianatural.carm.es/web/guest/espacios-naturales-protegidos • OISMA mapping viewer: https://geoportal.imida.es/oisma/ Castilla La Mancha: • List of Protected Natural Areas: http://pagina.jccm.es/medioambiente/espacios_naturales/listado.htm • Protected Areas of Castilla La Mancha: http://areasprotegidas.castillalamancha.es • Mapping Viewer: https://castillalamancha.maps.arcgis.com/apps/webappviewer/index.html?id=9dbc9704759b4e51ad6a405e740b5289 Galicia: • Protected Areas: http://cmaot.xunta.gal/seccion-tema/c/CMAOT_Conservacion?content=Direccion_Xeral_Conservacion_Natureza/Espazos_protexidos/seccion.html&std=presentacion.html • Nature Conservation Viewer: https://mapas.xunta.es/visores/conservaciondanatureza/ • Galicia, forestry harvesting viewer: http://mapas.xunta.gal/visores/aproveitamentos/ • Galicia mapping: https://www.sergas.es/Saude-publica/GIS-Cartografia-Galicia-formato-vectorial-SHP?idioma=es • DECREE 50/2014 Harvesting: https://www.xunta.gal/dog/Publicados/2014/20140507/AnuncioG0165-250414-0004_es.html Asturias: • Regional Network of Protected Natural Areas of Asturias (RRENP): http://movil.asturias.es/portal/site/medioambiente/menuitem.4691a4f57147e2c2553cbf10a6108a0c/?vgnextoid=6edf25d1d8375210VgnVCM10000097030a0aRCRD&i18n.http.lang=es

	• Map of Protected Areas: http://sitpa.cartografia.asturias.es/Geoportal/extlayout.aspx?userId=FZr4XHq0PJA=&lang=es • Environmental Network of Asturias, Natural Areas: https://www.asturias.es/portal/site/medioambiente/menuitem.a9853809264b19f45212678ca6108a0c/?vgnextoid=37ea50c3f2d79110VgnVCM1000006a01a8c0RCRD&i18n.http.lang=es • Environmental Network of Asturias,: https://www.asturias.es/portal/site/medioambiente/menuitem.902b26b36a5e1f63e7cc2a20a6108a0c/?vgnextoid=3cfda5c7be9fa110VgnVCM1000006a01a8c0RCRD&i18n.http.lang=es Cantabria: • Rural Network of Cantabria, Protected Natural Areas: https://redcantabrarural.com/naturea-3/espacios-naturales-protegidos/#EspaciosNaturalesProtegidosCantabria • Cantabria Maps: http://mapas.cantabria.es Euskadi: • Network of Protected Natural Areas: http://www.euskadi.eus/web01-a2ingdib/es/u95aWar/consultaMarcosJSP/U95aSubmitMarcoProteccion.do?&pkMarco=4&tipoEntidad=0&bloqueMarco=300 • Regulations: http://www.euskadi.eus/informacion/legislacion-sobre-patrimonio-natural-y-biodiversidad/web01-a2ingdib/es/ • GeoEuskadi viewer: http://www.geo.euskadi.eus/s69-bisorea/es/x72aGeoeuskadiWAR/index.jsp?def_groups=medio_ambiente&wmsLayers=medio_ambiente-lugares_protegidos#162 • Bizkaia Regional Council, Natural Heritage: http://web.bizkaia.eus/es//-/patrimonio-natural • Araba Regional Council, Natural Parks: http://www.araba.eus/cs/Satellite?c=Page&cid=1193046463565&language=es_ES&pagename=DiputacionAlava%2FPage%2FDPA_listado • General Authorities of Guipuzkoa, Landscape and Natural Areas: http://w390w.gipuzkoa.net/WAS/CORP/DJGPortalWEB/territorio_historico_de_gipuzkoa.jsp?id=0408&idioma=es Royal Decree 139/2011 List of Wild Species under the Special Protection Regime and the Spanish Catalogue of Threatened Species: https://www.boe.es/buscar/pdf/2011/BOE-A-2011-3582-consolidado.pdf Current status of the Lists of Wild Species under the Special Protection Regime and of the Spanish Catalogue of Threatened Species: https://www.miteco.gob.es/es/biodiversidad/temas/conservacion-de-especies/especies-proteccion-especial/ce-proteccion-listado-situacion.aspx 2016 Europarc Yearbook of the State of Protected Areas in Spain:http://www.redeuroparc.org/system/files/shared/Publicaciones/Anuario_2016/anuario_2016_europarc-espana.pdf FSC National Risk Assessment for Spain, FSC-NRA-ES V1-1 ES_2018-09-11: https://ic.fsc.org/en/document-center/id/309 Study on wood control procedures and risk assessment in each Autonomous Community for the application of the Due Diligence System: https://www.mapa.gob.es/es/desarrollo-rural/temas/politica-forestal/control_cortas_de_madera_espanya_2012_tcm30-152390.pdf
Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
2.2.4	The Biomass Producer has implemented appropriate control systems and procedures to ensure that biodiversity is protected (CPET S5b).
Finding	The concept of Biodiversity is linked to the high Conservation Values addressed in several previous indicators but is broader. Biodiversity or biological diversity can be defined as the variety of life. It covers the diversity of species of plants, animals, fungi and micro-organisms that live in a given space, their genetic variability, the ecosystems of which these species form part, and the landscapes or regions where the ecosystems are located. It also includes the ecological and evolutionary processes that occur in terms of genes, species, ecosystems and landscapes. Spain is one of the countries with the greatest biological diversity in the EU due, among other factors, to its geographical position, its geological diversity, its great climatic, orographic and soil variability, its paleobiogeographic history and the existence of islands. Law 42/2007 on Natural Heritage and Biodiversity establishes the basic legal framework for the conservation, sustainable use, improvement and restoration of natural heritage and biodiversity, establishing a series of instruments for the knowledge and planning of natural heritage and biodiversity, such as the Spanish Inventory of Natural Heritage and Biodiversity, the Strategic Plan for Natural Heritage and Biodiversity and the Guidelines for the Management of Natural Resources. With regards the conservation of habitats and natural areas, it incorporates the Protected Marine Areas, and includes the provisions related to the Natura 2000 European Ecological Network and the Areas protected by international instruments. In terms of the conservation of wild biodiversity, the law creates the List of Species under the Special Protection Regime and the Spanish Catalogue of Threatened Species, as well as the Spanish Catalogue of Invasive Alien Species. It also regulates the protection of species in relation to hunting and inland fishing and establishes the Spanish Hunting and Fishing Inventory. It also regulates access to genetic resources from wild taxa and the distribution of the benefits arising from their utilisation. The law also creates the Fund for Natural Heritage and Biodiversity, a co-financing instrument aimed at ensuring territorial cohesion and the achievement of the objectives of the law, the State Commission for Natural Heritage and Biodiversity, as an advisory and cooperation body between the State and the autonomous communities, and the State Council for Natural Heritage and Biodiversity, as a public participation body in the field of conservation and the sustainable use of natural heritage and biodiversity. In addition, as stated in previous indicators, in Spain there is a systematic legal framework for protection and a good level of governance linked to the degree of control by the forestry authority over activities in the natural environment, which is considered to be high or very high in all the Autonomous Communities except in Galicia, where it is considered to be Medium, and Cantabria, where it is considered to be Medium-High. Furthermore, Biosilva Agroforestal has a Manual of Good Forestry Practices that includes general modes of action for its field workers with basic measures for protecting the existing biodiversity. Taking into account all of the information above, the risk related to this indicator is classed as: Of the work that produces forestry biomass for Biosilva, the only aspect considered to be conflictive in terms of the risk to biodiversity, is the work carried out on private properties in Galicia and Cantabria, and the clearcutting carried out on private properties with continuous eucalyptus plantations of over 50 hectares, mainly in Andalusia. Based on the foregoing information, the risk related to this indicator is classified as: 1. low for forestry work/harvesting carried out in public contracts. 2. low for forestry work/harvesting on private properties that requires prior authorisation for the work from the competent authority.

	3. specified for forestry harvesting on private property with clearcutting of eucalyptus plantations with a continuous felling area of over 50 hectares 4. specified for forestry work/harvesting on private properties in Galicia and Cantabria.
Means of Verification	• Existing legal framework. Laws, regulations and control bodies • Technical Specifications for the allocation of the public forest works contract • Code of Good Environmental Practices. • Good Environmental Practices in Sustainable Forest Management. • Contracts with suppliers • Information received from suppliers on the environmental assessment of the work • Assessment of potential impacts at site level and of the measures taken to minimise impacts • Partial completion certificate • Final completion certificate.
Evidence Reviewed	Law 42/2007 on Natural Heritage and Biodiversity: https://www.boe.es/buscar/pdf/2007/BOE-A-2007-21490-consolidado.pdf Biodiversity concept: http://www.unesco.org/new/es/office-in-montevideo/natural-sciences/ecological-sciences/mab-lac-themes/biodiversidad/ Biodiversity concept: http://www.biodiversidad.gob.mx/biodiversidad/que_es.html MITECO: • Protected Areas of Spain: https://www.miteco.gob.es/es/biodiversidad/temas/espacios-protegidos/espacios-naturales-protegidos/ • Nature Data Bank, Protected Areas of Spain: https://www.miteco.gob.es/es/biodiversidad/servicios/banco-datos-naturaleza/informacion-disponible/ENP_Descargas.aspx#prettyPhoto • Map of Protected Areas of Spain: https://www.miteco.gob.es/es/biodiversidad/servicios/banco-datos-naturaleza/informacion-disponible/ENP_Descargas.aspx#prettyPhoto[pp_gal]/0/ • National Parks GIS layers: https://www.miteco.gob.es/es/red-parques-nacionales/sig/ Junta de Andalucía: • Network of Protected Areas of Andalucía (RENPA): http://www.juntadeandalucia.es/medioambiente/site/portalweb/menuitem.f497978fb79f8c757163ed105510e1ca/?vgnextoid=007fee9b421f4310VgnVCM2000000624e50aRCRD&vgnextchannel=3bdd61ea5c0f4310VgnVCM1000001325e50aRCRD • Natura 2000 Network: http://www.juntadeandalucia.es/medioambiente/site/portalweb/menuitem.f497978fb79f8c757163ed105510e1ca/?vgnextoid=d2d5f92658274410VgnVCM1000001325e50aRCRD&vgnextchannel=d0e77b32b31f4310VgnVCM1000001325e50aRCRD • RENPA viewer: http://www.juntadeandalucia.es/medioambiente/site/rediam/menuitem.04dc44281e5d53cf8ca78ca731525ea0/?vgnextoid=b2460c33f6959210VgnVCM1000001325e50aRCRD& • Natura 2000 Network viewer (SCIs, SPAs and SACs) in Andalucía: http://www.juntadeandalucia.es/medioambiente/site/rediam/menuitem.04dc44281e5d53cf8ca78ca731525ea0/?vgnextoid=cf7b1cab5bf59210VgnVCM1000001325e50aRCRD&vgnextchannel=66ffdb27eb364410VgnVCM1000001325e50aRCRD&vgnextfmt=rediam&lr=lang_es • Environmental Information downloads: http://www.juntadeandalucia.es/medioambiente/site/rediam/menuitem.aedc2250f6db83cf8ca78ca731525ea0/?vgnextoid=7b3ba7215670f210VgnVCM1000001325e50aRCRD&lr=lang_es Valencian Community: • Protected Natural Areas: http://www.agroambient.gva.es/es/web/medio-natural/espacios-naturales-protegidos • Natura 2000 Network: http://www.agroambient.gva.es/web/natura-2000 • Mapping viewer of the Valencian Community: http://visor.gva.es/visor/

	Region of Murcia: • Protected Natural Areas of the Region of Murcia: http://www.murcianatural.carm.es/web/guest/espacios-naturales-protegidos OISMA mapping viewer: https://geoportal.imida.es/oisma/ Castilla La Mancha: • List of Protected Natural Areas: http://pagina.jccm.es/medioambiente/espacios_naturales/listado.htm • Protected Areas of Castilla La Mancha: http://areasprotegidas.castillalamancha.es • Mapping Viewer: https://castillalamancha.maps.arcgis.com/apps/webappviewer/index.html?id=9dbc9704759b4e51ad6a405e740b5289 Galicia: • Protected Areas: http://cmaot.xunta.gal/seccion-tema/c/CMAOT_Conservacion?content=Direccion_Xeral_Conservacion_Natureza/Espazos_protexidos/seccion.html&std=presentacion.html • Nature Conservation Viewer: https://mapas.xunta.es/visores/conservaciondanatureza/ • Galicia, forestry harvesting viewer: http://mapas.xunta.gal/visores/aproveitamentos/ • Galicia mapping: https://www.sergas.es/Saude-publica/GIS-Cartografia-Galicia-formato-vectorial-SHP?idioma=es • DECREE 50/2014 Harvesting: https://www.xunta.gal/dog/Publicados/2014/20140507/AnuncioG0165-250414-0004_es.html Asturias: • Regional Network of Protected Natural Areas of Asturias (RRENP): http://movil.asturias.es/portal/site/medioambiente/menuitem.4691a4f57147e2c2553cbf10a6108a0c/?vgnextoid=6edf25d1d8375210VgnVCM10000097030a0aRCRD&i18n.http.lang=es • Map of Protected Areas: http://sitpa.cartografia.asturias.es/Geoportal/extlayout.aspx?userId=FZr4XHq0PJA=&lang=es • Environmental Network of Asturias, Natural Areas: https://www.asturias.es/portal/site/medioambiente/menuitem.a9853809264b19f45212678ca6108a0c/?vgnextoid=37ea50c3f2d79110VgnVCM1000006a01a8c0RCRD&i18n.http.lang=es • Environmental Network of Asturias,: https://www.asturias.es/portal/site/medioambiente/menuitem.902b26b36a5e1f63e7cc2a20a6108a0c/?vgnextoid=3cfda5c7be9fa110VgnVCM1000006a01a8c0RCRD&i18n.http.lang=es Cantabria: • Rural Network of Cantabria, Protected Natural Areas: https://redcantabrarural.com/naturea-3/espacios-naturales-protegidos/#EspaciosNaturalesProtegidosCantabria • Cantabria Maps: http://mapas.cantabria.es Euskadi: • Network of Protected Natural Areas: http://www.euskadi.eus/web01-a2ingdib/es/u95aWar/consultaMarcosJSP/U95aSubmitMarcoProteccion.do?&pkMarco=4&tipoEntidad=0&bloqueMarco=300 • Regulations: http://www.euskadi.eus/informacion/legislacion-sobre-patrimonio-natural-y-biodiversidad/web01-a2ingdib/es/ • GeoEuskadi viewer: http://www.geo.euskadi.eus/s69-bisorea/es/x72aGeoeuskadiWAR/index.jsp?def_groups=medio_ambiente&wmsLayers=medio_ambiente-lugares_protegidos#162 • Bizkaia Regional Council, Natural Heritage: http://web.bizkaia.eus/es//-/patrimonio-natural

	• Araba Regional Council, Natural Parks: http://www.araba.eus/cs/Satellite?c=Page&cid=1193046463565&language=es_ES&pagename=DiputacionAlava%2FPage%2FDPA_listado • General Authorities of Guipuzkoa, Landscape and Natural Areas: http://w390w.gipuzkoa.net/WAS/CORP/DJGPortalWEB/territorio_historico_de_gipuzkoa.jsp?id=0408&idioma=es • Guipuzkoa Regional Council, Forests and Protected Natural Areas: https://www.gipuzkoa.eus/es/web/mendiak-eremunaturalak/espacios-naturales-protegidos Royal Decree 139/2011 List of Wild Species under the Special Protection Regime and the Spanish Catalogue of Threatened Species: https://www.boe.es/buscar/pdf/2011/BOE-A-2011-3582-consolidado.pdf Current status of the Lists of Wild Species under the Special Protection Regime and of the Spanish Catalogue of Threatened Species: https://www.miteco.gob.es/es/biodiversidad/temas/conservacion-de-especies/especies-proteccion-especial/ce-proteccion-listado-situacion.aspx FSC National Risk Assessment for Spain, FSC-NRA-ES V1-1 ES_2018-09-11: https://ic.fsc.org/en/document-center/id/309 National Risk Assessment Spain 2017: FSC-NRA-ES V1-0 ES 2017-11-09: https://ic.fsc.org/en/document-center/id/150 Study on wood control procedures and risk assessment in each Autonomous Community for the application of the Due Diligence System: https://goo.gl/ZXYiCU : https://www.mapa.gob.es/es/desarrollo-rural/temas/politica-forestal/control_cortas_de_madera_espanya_2012_tcm30-152390.pdf
Risk Rating	☐ **Low Risk** ☒ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	For work on private properties in Galicia and Cantabria, the following methodology is considered necessary for appropriate protection of biodiversity (to be completed before the forestry work/exploitation is carried out): 1. Compile all the information available on biodiversity elements present in the work area, which can be done by Biosilva Agroforestal personnel on the visits prior to purchasing the material or through information obtained from the supplier. Elements of biodiversity to be evaluated in each specific situation by specialist Biosilva Agroforestal personnel may be: banks, microhabitat, mesohabitat, special species in the environment, protected species, ecotones... a. If this does not apply (there are no biodiversity elements in the work area), the work can go ahead with no need for any additional mitigation measures. b. If this does apply: ✓ it is noted in the work file, ✓ work is limited establishing the measures necessary to protect the elements present, such as, for example, the delimitation of zones or employing qualified personnel to biologically monitor the flora and/or fauna that may be affected by the works, ✓ at the end of the work, a visit will be made to check that the protected elements have not been affected. All of this is duly documented in the work file by qualified personnel. Biosilva Agroforestal has the appropriate technical means to identify elements of biodiversity to be protected in work areas and the correct procedures to approach their protection, including the training of its own workers as well as the workers of its subcontractors. In addition, Biosilva Agroforestal also has appropriate procedures in place (CoC FSC certification) to ensure that this information reaches its chip suppliers (primary feedstock) so that it is taken into account in the work to be carried out. In cases of clearcutting eucalyptus trees in areas of over 50 hectares, which may occur mainly in Andalusia, the following work methodology is established:

	5. Inspection of the felling licence to determine the limitations established with regards the elements of biodiversity. 6. Identify the elements of biodiversity to be protected, if any, during the prior field visit Elements of biodiversity may be: banks, microhabitat, mesohabitat, strips of indigenous vegetation, strips of scrubland, special species in the environment, protected species, ecotones... 7. If such elements are detected, the work is limited establishing the measures necessary to protect the elements present 8. On the final visit to the work area, check that the protected elements have not been affected, and then note then duly note this in the work file In addition, and in order to prevent any associated impact, checks are carried out in the harvest area to see if there are any plant stands with more than 50 hectares of continuous clearcutting (areas in which there are no elements of discontinuity: banks, strips of vegetation/scrubland…). If there are, as well as the methodology stated above, the stand will be compartmentalised so that felling of areas of over 50 hectares is not carried out again in the same year, so the stand will be felled in successive years until the harvest is completed.

	Indicator
2.2.5	The Biomass Producer has implemented appropriate control systems and procedures for verifying that the process of residue removal minimises harm to ecosystems.
Finding	With regards this issue we must remember that Spain has a clear and effective legal framework and competent authorities that carry out the control tasks. The Spanish regulations and the surveillance procedures carried out by the Autonomous Communities are consistent. The Autonomous Communities have their own personnel to carry out the control tasks. Within the Civil Guard there is also the SEPRONA unit (Nature Protection Service), which carries out environmental police work. No reports have been published on relevant environmental damage related to forestry work/harvesting. The procedure for waste management is usually specified in the Technical Specifications, authorisations or contracts that govern the execution of the work. Most of the Autonomous Communities have their own regulations for the management of forestry waste from authorised works and activities, and those that are not authorised. In addition, the burning of waste requires prior authorisation. BIOSILVA AGROFORESTAL also holds ISO 9001, ISO 14001 and OSHAS 18001 certifications, and has a Code of Good Environmental Practices in Sustainable Forestry Management that develops the different ways to manage the forestry waste resulting from the works. Biosilva Agroforestal undertakes work to harvest and improve forest cover; the methodology applied to remove forestry waste is shredding and burning, with shredding being the most commonly used method. Similarly, and due to its commercial activity, a large amount of forest waste is used for biomass. In addition, there is the final inspection task carried out by the Administration/owner, which requires compliance with the requirements of the Tender Specifications or contract regarding the waste treatment. Biosilva Agroforestal has a system implemented with the following elements in order to minimise the possible impacts of the works: ✓ Manual of good environmental practices, recommended conduct for its own workers and workers from subcontracted companies ✓ Manual of operating practices of the occupational risk prevention system ✓ Code of good environmental practices in Sustainable Forest Management

	✓ When Biosilva Agroforestal buys chips from other suppliers, and therefore the work in the forest is not under its control, under contract it obliges the supplier to provide its Manual of Good Environmental and Forestry Practices and to follow it and implement it in the work to be carried out. The technical personnel of Biosilva Agroforestal is responsible for collecting this information and ensuring compliance. In addition to this, and the level of control held by the public administrations, at the end of the works Biosilva Agroforestal always produces a works completion report with the owner that assesses the state of the work zone to check that there is no damage. Based on the foregoing, the risk related to this indicator is low.
Means of Verification	• Existing legal framework. Laws, regulations and control bodies • Manual of good environmental practices • Good Environmental Practices in Sustainable Forest Management • Contracts with suppliers • Information received from suppliers on the environmental assessment of the work • Assessment of potential impacts at site level • Assessment of the measures taken to minimise impacts • Monitoring results • Field visits to forestry work in progress • Partial completion certificate. • Final completion certificate.
Evidence Reviewed	Forestry Law consolidated text (Ley 43/2003 de Montes modificada por las Leyes 10/2006, de 28 de abril y 21/2015, de 20 de julio): https://www.boe.es/buscar/act.php?id=BOE-A-2003-21339 Law 2/1992, of 15 June, Forestry law of Andalucía: https://www.boe.es/buscar/act.php?id=BOE-A-1992-15996 Law 3/1993, of 9 December, of the Generalitat Valenciana, Forestry Law of the Valencian Community consolidated text: http://www.dogv.gva.es/auto/dogv/docvpub/rlgv/1993/L_1993_03_ca_L_2017_21.pdf Law 3/2008, of June 12, on Forests and Sustainable Forestry Management of Castilla-La Mancha: https://www.boe.es/buscar/act.php?id=BOE-A-2008-13685&p=20091223&tn=2 Law 7/2017 on Forests of Galicia, consolidated text: https://www.boe.es/buscar/pdf/2012/BOE-A-2012-11414-consolidado.pdf Law 3/2004, of November 23, on forests and forestry planning of Asturias: https://www.boe.es/buscar/pdf/2005/BOE-A-2005-393-consolidado.pdf Regulations, General Directorate of the Environment, Cantabria: http://dgmontes.org/normativa Provincial Forestry Regulations Bizkaia: http://www.bizkaia.eus/lehendakaritza/Bao_bob/2007/03/20070328a062.pdf?hash=ae5851ea071e2972507a0f4a7e971fe9#page=3 Provincial Forestry Regulations Guipuzkoa: http://www4.gipuzkoa.net/ogasuna/normativa/docs/0000785c.pdf Provincial Forestry Regulations Araba: https://www.araba.eus/botha/Boletines/2007/044/2007_044_02377.pdf Guide of Good Practices for the Prevention of Forest Fires: http://lifeomontevivo.org/docs/guiaprevinforpropfor.pdf Biosilva Agroforestal. Environmental and forestry management system
Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
2.2.6	The Biomass Producer has implemented appropriate control systems and procedures to verify that negative impacts on ground water, surface water and water downstream from forest management are minimised (CPET S5b).
Finding	Forest cover and its appropriate management has a positive impact on water resources, especially if compared to other uses such as agriculture. Of all the forestry work undertaken to produce the forestry feedstock within the Biosilva scope, only the large-scale clearcutting of eucalyptus, in areas of over 50 continuous hectares, mainly carried out in Andalusia is considered to be a risk; and clearcutting of eucalyptus in Andalusia in areas with gradients of over 30%. On the impact of desertification see indicator 2.2.2. With regards the protection of the headwaters of river basins, see indicator 2.5.2. These areas normally have protected reforestation carried out by the administration and protected by both state and regional legislation. Biosilva Agroforestal also has a system implemented with the following elements in order to minimise the possible impacts of the works: ✓ Manual of good environmental practices, recommended conduct for its own workers and workers from subcontracted companies ✓ Code of good environmental practices in Sustainable Forest Management that is known by all the company's workers and subcontractors. In this manual, basic protection measures are developed, such as safeguarding rivers and riparian vegetation, wetlands and small water springs, and in the case of the existence of water resources, physical and chemical alterations to water and watercourses are avoided, safeguarding areas of public hydraulic domain and avoiding the dragging of materials caused by erosive processes. ✓ When Biosilva Agroforestal buys chips from other suppliers, and therefore the work in the forest is not under its control, under contract it obliges the supplier to provide its Manual of Good Environmental and Forestry Practices and to follow it and implement it in the work to be carried out. The technical personnel of Biosilva Agroforestal is responsible for collecting this information and ensuring compliance. In addition to this, and the level of control held by the public administrations, at the end of the works Biosilva Agroforestal always produces a works completion report with the owner that assesses the state of the work zone to check that there is no damage. In view of the foregoing, the risk related to this indicator is classified as: 1. low for forestry biomass with the exception of the following points 2. specified for forestry biomass coming from clearcutting of eucalyptus plantations with a continuous felling area of over 50 hectares 3. specified for forestry biomass coming from eucalyptus felling in Andalusia in areas with gradients of over 30%.
Means of Verification	• Existing legal framework. Laws, regulations and control bodies • Technical Specifications for the allocation of the public forest works contract • Forestry work/harvesting authorisation • Manual of good environmental practices • Good Environmental Practices in Sustainable Forest Management • Contracts with suppliers • Information received from suppliers on the environmental assessment of the work • Assessment of potential impacts at site level and assessment of the measures taken to minimise impacts • Monitoring results • Field visits to forestry work in progress • Partial completion certificate. • Final completion certificate.

Evidence Reviewed	Forestry Law consolidated text (Forestry Law 43/2003 amended by Laws 10/2006, of 28 April and 21/2015, of 20 July): https://www.boe.es/buscar/act.php?id=BOE-A-2003-21339 Law 2/1992, of 15 June, Forestry law of Andalucía: https://www.boe.es/buscar/act.php?id=BOE-A-1992-15996 Law 3/1993, of 9 December, of the Generalitat Valenciana, Forestry Law of the Valencian Community consolidated text: http://www.dogv.gva.es/auto/dogv/docvpub/rlgv/1993/L_1993_03_ca_L_2017_21.pdf Law 3/2008, of June 12, on Forests and Sustainable Forestry Management of Castilla-La Mancha: https://www.boe.es/buscar/act.php?id=BOE-A-2008-13685&p=20091223&tn=2 Law 7/2017 on Forests of Galicia, consolidated text: https://www.boe.es/buscar/pdf/2012/BOE-A-2012-11414-consolidado.pdf Law 3/2004, of November 23, on forests and forestry planning of Asturias: https://www.boe.es/buscar/pdf/2005/BOE-A-2005-393-consolidado.pdf Regulations, General Directorate of the Environment, Cantabria: http://dgmontes.org/normativa Provincial Forestry Regulations Bizkaia: http://www.bizkaia.eus/lehendakaritza/Bao_bob/2007/03/20070328a062.pdf?hash=ae5851ea071e2972507a0f4a7e971fe9#page=3 Provincial Forestry Regulations Guipuzkoa: http://www4.gipuzkoa.net/ogasuna/normativa/docs/0000785c.pdf Provincial Forestry Regulations Araba: https://www.araba.eus/botha/Boletines/2007/044/2007_044_02377.pdf MAPAMA: National Inventory of Soil Erosion(INES): https://www.mapa.gob.es/es/desarrollo-rural/temas/politica-forestal/inventario-cartografia/inventario-nacional-erosion-suelos/ MAPAMA, National Action Programme against Desertification (PAND): https://www.mapa.gob.es/es/desarrollo-rural/temas/politica-forestal/desertificacion-restauracion-forestal/lucha-contra-la-desertificacion/lch_pand_descargas.aspx MAPAMA, Regulatory Framework for Hydrological Planning: http://www.mapama.gob.es/es/agua/legislacion/Marco_normativo_planificacion.aspx Spanish Society of Forest Sciences : • Report on the situation of forests and the forestry sector in Spain 2013 (ISFE): http://secforestales.org/content/informe-isfe • ISFE 2017 Progress Report : http://secforestales.org/sites/default/files/archivos/7cfe_avance_isfe_final.pdf Biosilva Agroforestal environmental and forestry management systems.
Risk Rating	☐ **Low Risk** ☒ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	In eucalyptus harvests in Andalusia, the Government of Andalusia usually limits the work in the felling licence to avoid any negative impacts. Specifically, one of the measures that is established is to respect river banks and water courses, as well as the prohibition of removing the stumps in order to ensure the grip of the land and make sure the water is not affected. For biomass coming from clearcut harvesting of eucalyptus trees in areas of over 50 hectares or in areas with a gradient of over 30%, Biosilva makes sure that all the specifications/limitations established in the felling licence are followed and that the water courses are not damaged. To do this, the following steps are established for these cases: 5. Inspection of the felling licence to determine the limitations established with regards water courses 6. Identify the elements to be protected, if any, during the prior visit Elements to be protected may be: water courses, banks, strips of indigenous vegetation, strips of scrubland, stumps... 7. If such elements are detected, the work is limited establishing the measures necessary to protect the elements present

	8. On the final visit to the work area, check that the protected elements have not been affected, and then note then duly note this in the work file Biosilva Agroforestal has the appropriate technical means to identify elements to be protected in work areas and the correct procedures to approach their protection, including the training of its own workers as well as the workers of its subcontractors. In addition, Biosilva Agroforestal also has appropriate procedures in place (CoC FSC certification) to ensure that this information reaches its chip suppliers (primary feedstock) so that it is taken into account in the work to be carried out.

	Indicator
2.2.7	The Biomass Producer has implemented appropriate control systems and procedures for verifying that air quality is not adversely affected by forest management activities.
Finding	With regards this issue we must remember that Spain has a clear and effective legal framework and competent authorities that carry out the control tasks. The Spanish regulations and the surveillance procedures carried out by the Autonomous Communities are consistent. The Autonomous Communities have their own personnel to carry out the control tasks. Within the Civil Guard there is also the SEPRONA unit (Nature Protection Service), which carries out environmental police work. No reports have been published on relevant environmental damage related to forestry work/harvesting. The greatest impacts on air quality in forests are caused by fires or emissions from nearby heavy industries. Neither of these two factors are a consequence of forestry work/harvesting management activities. With regards the scope of the work carried out by Biosilva Agroforestal, the impacts on air quality are caused by the emissions from the machinery used to complete the work. Therefore, the work is not continuous in just one zone, so the impact is intermittent. Biosilva Agroforestal holds the ISO 9001, ISO 14001 and OSHAS 18001 certifications, and has an environmental policy with procedures implemented to minimise the emission of atmospheric pollutants. In forestry works three main sources of atmospheric pollution have been identified: - Dust To minimise the amount of dust produced by the works, it is necessary to proceed in moderation in those places where dust is generated. - Combustion gases from machinery and vehicles. To minimise the emission of gasses, the engines must be kept perfectly maintained and switched off when not in use. - Incineration of forest waste Other forest waste management methods should be supplied rather than incineration, thereby avoiding the emission of combustion gases, such as shredding. Biosilva Agroforestal also has a system implemented with the following elements in order to minimise the possible impacts of the works: ✓ Manual of good environmental practices, recommended conduct for its own workers and workers from subcontracted companies ✓ Manual of operating practices of the occupational risk prevention system ✓ Code of good environmental practices in Sustainable Forest Management. ✓ When Biosilva Agroforestal buys chips from other suppliers, and therefore the work in the forest is not under its control, under contract it obliges the supplier to provide its Manual of Good Environmental and Forestry Practices and to follow it and implement it in the work to be carried out. The technical personnel of Biosilva Agroforestal are responsible for collecting this information and ensuring compliance. Based on the foregoing, the risk related to this indicator is classed as low.

Means of Verification	• Existing legal framework. Laws, regulations and control bodies • Manual of good environmental practices • Good Environmental Practices in Sustainable Forest Management • Contracts with suppliers • Information received from suppliers on the environmental assessment of the work • Assessment of potential impacts at site level and assessment of the measures taken to minimise impacts • Monitoring results
Evidence Reviewed	MAPAMA: • Air quality, regulations: http://www.mapama.gob.es/es/calidad-y-evaluacion-ambiental/temas/atmosfera-y-calidad-del-aire/calidad-del-aire/normativa/ • Law 34/2007, of 15 November, on air quality and protection of the atmosphere: https://www.boe.es/buscar/pdf/2007/BOE-A-2007-19744-consolidado.pdf Biosilva Agroforestal. Environmental and forestry management system
Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
2.2.8	The Biomass Producer has implemented appropriate control systems and procedures for verifying that there is controlled and appropriate use of chemicals, and that Integrated Pest Management (IPM) is implemented wherever possible in forest management activities (CPET S5c).
Finding	With regards this issue we must remember that Spain has a clear and effective legal framework and competent authorities that carry out the control tasks. The Spanish regulations and the surveillance procedures carried out by the Autonomous Communities are consistent. The Autonomous Communities have their own personnel to carry out the control tasks. Within the Civil Guard there is also the SEPRONA unit (Nature Protection Service), which carries out environmental police work. No reports have been published on relevant environmental damage caused by the use of chemicals linked to forestry work/harvesting. To be able to apply biocides and chemical agents it is necessary to have a licence issued by a body recognised by the competent authority and to have completed training in this field. Biosilva Agroforestal holds the ISO 9001, ISO 14001 and OSHAS 18001 certifications, and has an environmental policy for chemical management with a system to control the use of pesticides, and it also carries out analyses through authorised laboratories when necessary, when there is a risk of pests. In addition, before starting any harvesting works, Biosilva Agroforestal requests information on the area of action, and in the event of a pest risk, the work is cancelled. In addition, BIOSILVA AGROFORESTAL has a system implemented with the following elements in order to minimize possible impacts: ✓ Manual of good environmental practices, recommended conduct for its own workers and workers from subcontracted companies ✓ Manual of operating practices of the occupational risk prevention system ✓ Code of good environmental practices in Sustainable Forest Management ✓ When Biosilva Agroforestal buys chips from other suppliers, and therefore the work in the forest is not under its control, under contract it obliges the supplier to provide its Manual of Good Environmental and Forestry Practices and to follow it and implement it in the work to be carried out. The technical personnel of Biosilva Agroforestal is responsible for collecting this information and ensuring compliance. Based on the foregoing, the risk related to this indicator is classed as low.

Means of Verification	• Existing legal framework. Laws, regulations and control bodies • Manual of good environmental practices • Good Environmental Practices in Sustainable Forest Management • Contracts with suppliers • Information received from suppliers on the environmental assessment of the work • Assessment of potential impacts at site level • Assessment of the measures taken to minimise impacts • Monitoring results • Field visits to forestry work in progress
Evidence Reviewed	Ministry of Health, Social Services and Equality: • Chemical substances legislation: https://www.msssi.gob.es/ciudadanos/saludAmbLaboral/prodQuimicos/legislacion.htm • Royal Decree 830/2010, of 25 June, which establishes the regulations governing training in biocide treatment: https://www.boe.es/boe/dias/2010/07/14/pdfs/BOE-A-2010-11157.pdf Ministry of the Presidency, Royal Decree 1311/2012, of 14 September, establishing the framework for action to achieve a sustainable use of plant protection products: https://www.boe.es/boe/dias/2012/09/15/pdfs/BOE-A-2012-11605.pdf Biosilva Agroforestal. Environmental and forestry management system
Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
2.2.9	The Biomass Producer has implemented appropriate control systems and procedures for verifying that methods of waste disposal minimise negative impacts on forest ecosystems (CPET S5d).
Finding	With regards this issue we must remember that Spain has a clear and effective legal framework and competent authorities that carry out the control tasks. The Spanish regulations and the surveillance procedures carried out by the Autonomous Communities are consistent. The Autonomous Communities have their own personnel to carry out the control tasks. Within the Civil Guard there is also the SEPRONA unit (Nature Protection Service), which carries out environmental police work. No reports have been published on relevant environmental damage caused by the production of waste linked to forestry work/harvesting. Biosilva Agroforestal holds the ISO 9001, ISO 14001 and OSHAS 18001 certifications, and has an environmental policy aimed at reducing waste production as much as possible and reusing and recycling any waste that is produced. The waste management system of Biosilva Agroforestal is as follows: - Urban waste: areas must be kept clean and free from residue of rubbish scattered in the floor. Urban waste must be collected and deposited in the nearest municipal container. - Hazardous waste. Proper management of hazardous waste begins at the moment the waste is generated, and all personnel are involved, following the instructions listed below: • Do not mix hazardous waste. • Dispose of hazardous waste through an authorised waste management company

	Biosilva Agroforestal also has a system implemented with the following elements in order to minimise the possible impacts of the works: ✓ Manual of good environmental practices, recommended conduct for its own workers and workers from subcontracted companies ✓ Manual of operating practices of the occupational risk prevention system ✓ Code of good environmental practices in Sustainable Forest Management ✓ When Biosilva Agroforestal buys chips from other suppliers, and therefore the work in the forest is not under its control, under contract it obliges the supplier to provide its Manual of Good Environmental and Forestry Practices and to follow it and implement it in the work to be carried out. The technical personnel of Biosilva Agroforestal is responsible for collecting this information and ensuring compliance. In addition to this, and the level of control held by the public administrations, at the end of the works Biosilva Agroforestal always produces a works completion report with the owner that assesses the state of the work zone to check that there is no damage or effects caused by waste. Based on the foregoing, the risk related to this indicator is low.
Means of Verification	• Existing legal framework. Laws, regulations and control bodies • Manual of good environmental practices • Good Environmental Practices in Sustainable Forest Management • Contracts with suppliers • Information received from suppliers on the environmental assessment of the work • Assessment of potential impacts at site level • Assessment of the measures taken to minimise impacts • Monitoring results • Field visits to forestry work in progress • Partial completion certificates. • Final completion certificates.
Evidence Reviewed	MAPAMA, waste management and prevention, regulations and planning: http://www.mapama.gob.es/es/calidad-y-evaluacion-ambiental/temas/prevencion-y-gestion-residuos/normativa-y-planificacion/ Law 22/2011 on contaminated soil and waste: https://www.boe.es/buscar/pdf/2011/BOE-A-2011-13046-consolidado.pdf Biosilva Agroforestal. Environmental and forestry management
Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
2.3.1	Analysis shows that feedstock harvesting does not exceed the long-term production capacity of the forest, avoids significant negative impacts on forest productivity and ensures long-term economic viability. Harvest levels are justified by inventory and growth data.
Finding	The available forestry statistics (IFN3) show a significant increase in timber stocks in Spain from inventory to inventory as a result of both the continued increase in forest area in recent decades and the improvement in forest cover. Also, according to the reports produced by the Ministry's Forestry Service, the annual growth of wood in Spanish forests (45 million m3) is about three times greater than the amount actually cut down and harvested (17 million m3 in 2016), with a variable global extraction rate of 35-40% depending on the Autonomous Community. In any case, the short ones are always below the growth. The felling data in 2016 per Autonomous Community and the whole of Spain is shown below:  GOBIERNO DE ESPAÑA — MINISTERIO DE AGRICULTURA, PESCA Y ALIMENTACIÓN **ANUARIO DE ESTADÍSTICA FORESTAL 2016** The levels of harvesting are always well justified. In eucalyptus groves the entire cover is harvested at the end of the shift, while in pine groves, intermediate work and harvesting is carried out, although in all cases the harvesting levels are conservative, as confirmed by the statistics and reports. In the 2012 figures, the extraction rate per Autonomous Community is shown below:

COMUNIDAD AUTÓNOMA	PROVINCIA	Coníferas (m3 c.c.)	Frondosas (m3 c.c.)	TOTAL 2016 (m3 c.c.)
Total Andalucía		40.077,21	4.941,00	45.018,21
Total Asturias		254.344,00	892.583,00	1.146.927,00
Total C. Valenciana		13.366,45	6.139,46	19.505,91
Total Cantabria		105.043,53	424.489,56	529.533,09
Total Castilla-La Mancha		236.319,47	32.765,00	269.084,47
Total Galicia		3.010.464,00	5.634.262,00	8.644.726,00
Total Murcia				
Total País Vasco		1.428.804,58	215.829,58	1.644.634,16
Total general		**8.134.564,62**	**8.713.252,43**	**16.847.817,05**

Tabla 64: Tasa de extracción (extracción / crecimiento) y tasa de cobertura (extracción /consumo de madera) de los recursos maderables por CC. AA. con referencia a 2010. Los crecimientos anuales son los expresados en el Anuario de Estadística Forestal de 2010 obtenidos por diferencias entre IFN3 e IFN2 o entre IFN4 e IFN3, según los casos. Los volúmenes de extracción se refieren a las cortas de maderas realizadas en 2010, según el Anuario de Estadística Agraria de 2012, incluyendo datos estimados para Extremadura y Madrid por información de 2011. Consumo de madera según SECF (2010).

Comunidad Autónoma	Tasa de extracción (%)	Crecimiento (m^3 x 1000)	Extracción (m^3 x 1000)	Consumo de madera (m^3 x 1000)	Tasa de Cobertura (%)	Sup. Arbolada (x 1000 ha)	Intensidad de cortas (m^3/ha arbolada)
Andalucía	12	3.075	368	5.542	6,6	2.656	0,14
Aragón	6	2.760	171	893	19,1	1.578	0,11
Asturias	29	2.810	820	720	113,8	451	1,82
Baleares	5	222	10	728	1,4	186	0,05
Canarias	4	383	15	1.412	1,1	134	0,11
Cantabria	42	1.215	505	392	128,8	214	2,36
Castilla La Mancha	7	3.374	227	1.375	16,5	2.740	0,08
Castilla y León	20	7.204	1.470	1.707	86,1	2.982	0,49
Cataluña	15	3.964	615	4.957	12,4	1.626	0,38
Comunidad Valenciana	5	756	40	3.394	1,2	754	0,05
Extremadura	51	1.223	631	735	85,8	1.921	0,33
Galicia	58	13.057	7.619	1.862	409,2	1.405	5,42
La Rioja	6	728	42	215	19,5	170	0,24
Madrid	7	394	27	4.281	0,6	270	0,10
Murcia	1	237	2	982	0,2	316	0,01
Navarra	21	1.488	315	418	75,3	463	0,68
País Vasco	27	3.831	1.021	1.453	69,6	398	2,56
Total España	30	46.722	13.898	31.066	44,7	18.264	0,76

Fuente: MAGRAMA (2012)

In view of all the information above, the risk related to this indicator is classed as low.

Means of Verification

- Management Plan, stocks and growth data
- National or regional inventories, stocks and growth data.
- Harvested volume data

Evidence Reviewed

Government of Spain:

- Ministry of Agriculture, Fisheries and Food: https://www.mapa.gob.es/es/
- Ministry for Ecological Transition: https://www.miteco.gob.es/es/
- Biodiversidad: https://www.miteco.gob.es/es/biodiversidad/temas/
- Estadísticas forestales: https://www.miteco.gob.es/es/biodiversidad/estadisticas/
- Forestry Statistical Yearbooks: https://www.mapa.gob.es/es/desarrollo-rural/estadisticas/forestal_anuarios_todos.aspx
- Forestry Statistical Yearbook 2016: https://www.mapa.gob.es/es/desarrollo-rural/estadisticas/forestal_anuario_2016.aspx
- IFN3: https://www.miteco.gob.es/es/biodiversidad/servicios/banco-datos-naturaleza/informacion-disponible/ifn3.aspx
- Estadísticas Aprovechamientos Forestales: https://www.mapa.gob.es/es/desarrollo-rural/estadisticas/forestal_aprovechamientos.aspx
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Junta de Andalucía:

- Regional Ministry of Environment and Territorial Planning: http://www.juntadeandalucia.es/medioambiente/site/portalweb
- Forestry Service: https://goo.gl/o7bEfQ
- Plan Infoca. The Natural Environment of Andalucía.

Region of Murcia:

- Natural Environment: http://www.murcianatural.carm.es/web/guest
- Forestry Sector: http://www.murcianatural.carm.es/web/guest/ambito-forestal

	Valencian Community: • Natural Environment: https://goo.gl/7umhzn • Forests and Woodland: http://www.agroambient.gva.es/es/web/medio-natural/montes • http://www.agroambient.gva.es/web/medio-natural/el-territorio-forestal-de-la-comunitat-valenciana Castilla La Mancha: • General Directorate of Forestry Policy and Natural Areas, Actions: http://www.castillalamancha.es/gobierno/agrimedambydesrur/estructura/dgapfyen/actuacionesorganismo • General Directorate of Forestry Policy and Natural Areas, Sustainable Forest Management: http://www.castillalamancha.es/gobierno/agrimedambydesrur/estructura/dgapfyen/actuaciones/gestión-forestal-sostenible • General Directorate of Forestry Policy and Natural Areas, online office: https://www.jccm.es/gobierno/agricultura/estructura/dgamen • Livestock Trails and Public Forests: http://agricultura.jccm.es/imovip/index_imv.php Galicia: • Rural Environment: http://mediorural.xunta.gal/es/ • Forestry Area: http://mediorural.xunta.gal/es/areas/forestal/presentacion/ • Environment and Land Planning: http://cmaot.xunta.gal/portada • Galician Forests in Figures: http://mediorural.xunta.gal/institucional/publicacions/forestal/o_monte_en_cifras/ Asturias: • Forestry Policy: https://www.asturias.es/portal/site/webasturias/menuitem.a76385ecc651687bd9db8433f2300030/?vgnextoid=11df7e1385dfe210VgnVCM10000097030a0aRCRD&i18n.http.lang=fr • General Directorate of Forests and Agricultural Infrastructures. Cantabria: • General Directorate of the Natural Environment: http://dgmontes.org Euskadi: • Government of Euskadi, Biological and geological diversity: http://www.euskadi.eus/gobierno-vasco/diversidad-biologica-geologica/ • Bizkaia Provincial Council, Forestry Service: http://www.bizkaia.eus/home2/Temas/DetalleTema.asp?Tem_Codigo=2628&Idioma=CA • Guipuzkoa Provincial Council, Forests and Protected Natural Areas: https://www.gipuzkoa.eus/es/web/mendiak-eremunaturalak/ • Araba Provincial Council, Forestry Service: https://web.araba.eus/es/montes Spanish Society of Forest Sciences: • Report on the situation of forests and the forestry sector in Spain 2013 (ISFE) http://secforestales.org/content/informe-isfe • ISFE 2017 Progress report (*Spanish Forestry Sector*): http://secforestales.org/sites/default/files/archivos/7cfe_avance_isfe_final.pdf
Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
2.3.2	Adequate training is provided for all personnel, including employees and contractors (CPET S6d).
Finding	Biosila Agroforestal has an implemented system that covers all the aspects to be considered to ensure compliance with the legislation on Occupational Risk Prevention and Occupational Health and Safety, including the appropriate training for workers. This system covers its own workers as well as its subcontractors and suppliers. A large number of companies contract an external prevention service that is in charge of carrying out the assessment of the company's occupational risks, implementing the necessary measures to minimise them and providing adequate training for the company's workers. This is the case of Biosilva Agroforestal, which holds a prevention service contract with the company Quirón Prevención S.L.U. It is through this channel that BIOSILVA AGROFORESTAL carries out training plans for all its personnel. For subcontractors and suppliers, Biosilva Agroforestal requests that all documentation relating to the working conditions of workers, including through the Training Certificates and Information required in the field of Occupational Risk Prevention, be submitted for verification. In addition, Biosilva Agroforestal has a Manual of Good Forestry Practices developed and implemented which describes all the forestry work, the way to approach it, the preventive safety measures necessary and the correct procedure to follow in the event of an accident or emergency. Biosilva Agroforestal certifies the training of its workers in this respect. By contract, subcontracted companies and suppliers must have a Manual of Good Forestry Practices and certify its implementation to Integra personnel, or use the Biosilva Agroforestal Manual. Th system developed is considered complete and sufficient to ensure adequate training of the company's own personnel and external personnel. Based on the foregoing, the risk related to this indicator is classed as low.
Means of Verification	• Existing legal framework. Laws, regulations and control bodies. • Training plan, course registration and training material • Records of training courses held • Monitoring of compliance with Employment and Social Security regulations. • Interviews with workers
Evidence Reviewed	Biosilva Agroforestal Environmental System. Law 31/1995 on the Prevention of Occupational Risks: https://www.boe.es/buscar/pdf/1995/BOE-A-1995-24292-consolidado.pdf Royal Decree 39/1997 approving the Regulation of Prevention Services: https://www.boe.es/buscar/pdf/1997/BOE-A-1997-1853-consolidado.pdf Ministry of Employment and Social Security, Employment guide, prevention of occupational risks: http://www.empleo.gob.es/es/guia/texto/guia_10/contenidos/guia_10_22_2.htm Spanish legislation on Employment and Social Security: https://www.boe.es/legislacion/codigos/codigo.php?id=93&modo=1&nota=0&tab=2
Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
2.3.3	Analysis shows that feedstock harvesting and biomass production positively contribute to the local economy, including employment.
Finding	The activity of the Spanish forestry industry has been considerably affected by the economic crisis, especially by the bursting of the housing bubble. The data indicate that the industry's activity has been recovering in recent years, since 2012, although it is still a long way off the pre-2008 figures. Within this recovery, bioenergy plays an important role since it is mobilising many resources both for national use and for export, either in the form of chips or pellets. Foreign trade in the forestry sector presents a positive balance from 2012-2016. In terms of economic impact and employment in the local economy, a distinction must be drawn between the Cantabrian Cornice (Asturias, Cantabria, Euskadi and Galicia), with mainly productive areas, where the timber industry is an important source of income in rural areas (half of the volume of timber felled in Spain comes from Galicia), and the more Mediterranean Autonomous Communities: Andalusia, Region of Murcia and the Valencian Community, where timber-producing forests are scarcer or non-existent and where income comes from other types of work and services. According to the X Study of Investment and Employment in the Forestry Sector, 2015 and 2016, produced by ASEMFO in collaboration with the Government of Spain, the number of forestry companies in 2016 are as follows: Andalucía  Comunidad Valenciana  Región del Murcia  Castilla La Mancha 

Galicia

Asturias

Cantabria

Euskadi

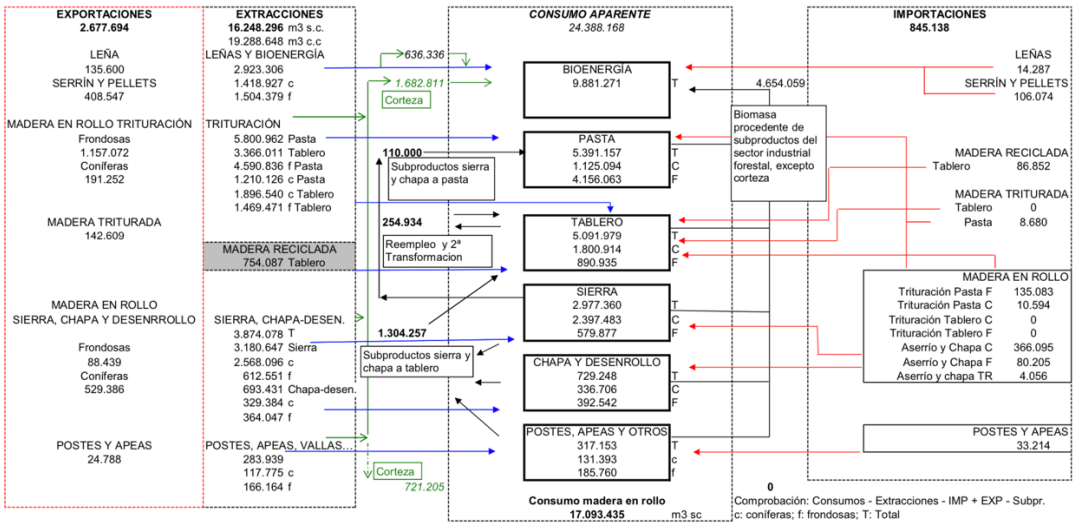
This data is generated by the following timber values obtained from the Government of Spain:

GOBIERNO DE ESPAÑA
MINISTERIO DE AGRICULTURA, PESCA Y ALIMENTACIÓN

ANUARIO DE ESTADÍSTICA FORESTAL 2016

COMUNIDAD AUTÓNOMA	PROVINCIA	Coníferas (m3 c.c.)	Frondosas (m3 c.c.)	TOTAL 2016 (m3 c.c.)
Total Andalucía		40.077,21	4.941,00	45.018,21
Total Aragón		197.953,01	16.731,01	214.684,02
Total Asturias		254.344,00	892.583,00	1.146.927,00
Total Baleares		6.446,53	2.228,29	8.674,82
Total C. Valenciana		13.366,45	6.139,46	19.505,91
Total Canarias		5.019,00	30,00	5.049,00
Total Cantabria		105.043,53	424.489,56	529.533,09
Total Castilla y León		1.729.878,64	608.432,35	2.338.310,99
Total Castilla-La Mancha		236.319,47	32.765,00	269.084,47
Total Cataluña		671.308,10	105.496,00	776.804,10
Total Extremadura		180.868,80	609.892,18	790.760,98
Total Galicia		3.010.464,00	5.634.262,00	8.644.726,00
Total La Rioja		107.530,00	41.051,00	148.581,00
Total Madrid		11.129,30	2.707,00	13.836,30
Total Murcia				
Total Navarra		136.012,00	115.675,00	251.687,00
Total País Vasco		1.428.804,58	215.829,58	1.644.634,16
Total general		**8.134.564,62**	**8.713.252,43**	**16.847.817,05**

BALANCE DE LA MADERA EN ROLLO 2016 (M3 S.C.EQUIVALENTES)



The working population employed in fields related to the forestry sector represented, in 2016, 5.7% of the total active population employed. This percentage has remained fairly constant since 2008, when it stabilised after a steady decline.

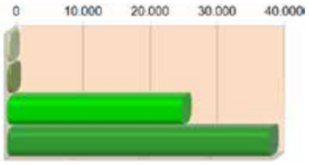
Although in the most relevant yeas of the economic crisis, the forestry sector maintained very constant relative percentages of the working population, demonstrating the capacity to adapt to cope with difficult situations, it is to be expected that in the short term these percentages may increase in the future, based on the green employment generated by the use of

sustainable energy such as biomass, a greater enhancement of the multifunctionality of forestry together with people's greater awareness of the benefits, both direct and indirect (social, economic and environmental), etc.

According to the X Study of Investment and Employment in the Forestry Sector, 2015 and 2016, produced by ASEMFO in collaboration with the Government of Spain, the information regarding contracts executed in the primary forestry sector in 2016 is as follows:

Andalucía

Contratos realizados en el sector forestal primario



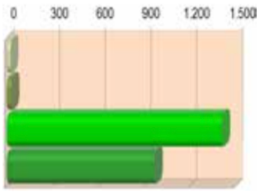
Fuente: SEPE, Observatorio ocupacional.

Distribución de los contratos (media 15-16)	Contrato de Ocupación	13	14	15	16	MEDIA 15-16
	Ingenieros de Montes y Directores de producción de explotaciones agropecuarias y forestales*	465	562	640	682	661
	Ingenieros Técnicos Forestales y del Medio Natural	799	900	858	840	849
	Trabajadores cualificados en actividades forestales y del medio natural*	22.495	25.025	25.718	26.777	26.248
	Peones forestales y de la caza	26.572	36.123	41.641	36.809	39.225

* Ver apartado Metodología.

Comunidad Valenciana

Contratos realizados en el sector forestal primario



Fuente: SEPE, Observatorio ocupacional.

Distribución de los contratos (media 15-16)	Contrato de Ocupación	13	14	15	16	MEDIA 15-16
	Ingenieros de Montes y Directores de producción de explotaciones agropecuarias y forestales*	22	28	34	35	35
	Ingenieros Técnicos Forestales y del Medio Natural	50	21	45	36	41
	Trabajadores cualificados en actividades forestales y del medio natural*	594	996	1.453	1.386	1.420
	Peones forestales y de la caza	731	1.010	1.153	807	980

* Ver apartado Metodología.

Región de Murcia

Contratos realizados en el sector forestal primario

Fuente: SEPE, Observatorio ocupacional.

Distribución de los contratos (media 15-16)	Contrato de Ocupación	13	14	15	16	MEDIA 15-16
	Ingenieros de Montes y Directores de producción de explotaciones agropecuarias y forestales*	12	5	17	19	18
	Ingenieros Técnicos Forestales y del Medio Natural	17	27	21	13	17
	Trabajadores cualificados en actividades forestales y del medio natural*	389	402	325	431	378
	Peones forestales y de la caza	138	71	143	109	126

* Ver apartado Metodología.

Castilla La Mancha

Contratos realizados en el sector forestal primario

Distribución de los contratos (media 15-16)

Fuente: SEPE, Observatorio ocupacional.

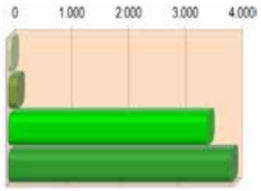
Contrato de Ocupación	13	14	15	16	MEDIA 15-16
Ingenieros de Montes y Directores de producción de explotaciones agropecuarias y forestales*	17	32	23	37	30
Ingenieros Técnicos Forestales y del Medio Natural	65	70	48	44	46
Trabajadores cualificados en actividades forestales y del medio natural*	1.889	796	1.157	1.285	1.221
Peones forestales y de la caza	1.928	5.177	7.872	7.120	7.496

* Ver apartado Metodología.

Galicia

Contratos realizados en el sector forestal primario

Distribución de los contratos (media 15-16)



Fuente: SEPE, Observatorio ocupacional.

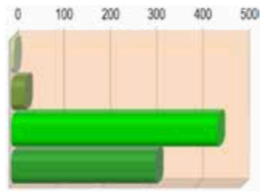
Contrato de Ocupación	13	14	15	16	MEDIA 15-16
Ingenieros de Montes y Directores de producción de explotaciones agropecuarias y forestales*	64	53	76	78	77
Ingenieros Técnicos Forestales y del Medio Natural	137	141	159	199	179
Trabajadores cualificados en actividades forestales y del medio natural*	2.894	3.354	3.602	3.430	3.516
Peones forestales y de la caza	3.280	3.525	4.165	3.702	3.934

* Ver apartado Metodología.

Asturias

Contratos realizados en el sector forestal primario

Distribución de los contratos (media 15-16)



Fuente: SEPE, Observatorio ocupacional.

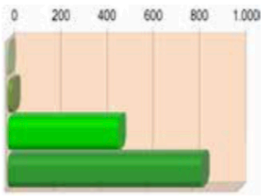
Contrato de Ocupación	13	14	15	16	MEDIA 15-16
Ingenieros de Montes y Directores de producción de explotaciones agropecuarias y forestales*	16	7	10	7	9
Ingenieros Técnicos Forestales y del Medio Natural	37	31	38	28	33
Trabajadores cualificados en actividades forestales y del medio natural*	622	563	441	456	449
Peones forestales y de la caza	390	297	331	300	316

* Ver apartado Metodología.

Cantabria

Contratos realizados en el sector forestal primario

Distribución de los contratos (media 15-16)



Fuente: SEPE, Observatorio ocupacional.

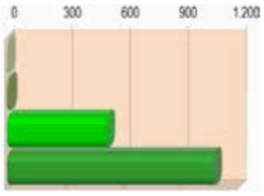
Contrato de Ocupación	13	14	15	16	MEDIA 15-16
Ingenieros de Montes y Directores de producción de explotaciones agropecuarias y forestales*	2	7	10	5	8
Ingenieros Técnicos Forestales y del Medio Natural	20	25	34	22	28
Trabajadores cualificados en actividades forestales y del medio natural*	220	420	497	471	484
Peones forestales y de la caza	377	491	719	968	844

* Ver apartado Metodología.

Euskadi

Contratos realizados en el sector forestal primario

Distribución de los contratos (media 15-16)



Contrato de Ocupación	13	14	15	16	MEDIA 15-16
Ingenieros de Montes y Directores de producción de explotaciones agropecuarias y forestales*	4	5	13	6	10
Ingenieros Técnicos Forestales y del Medio Natural	29	26	23	13	18
Trabajadores cualificados en actividades forestales y del medio natural*	326	474	486	559	523
Peones forestales y de la caza	795	1.041	1.120	1.032	1.076

Fuente: SEPE, Observatorio ocupacional.

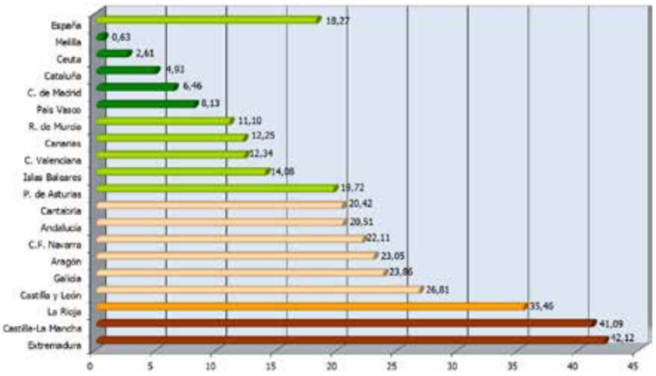
* Ver apartado Metodología.

Another important aspect of forestry economy is the level of investment made by public administrations, which is an important source of economic resource mobilisation and generates employment..

Año	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Inversión Total (miles de €)	52.278.745	56.162.224	56.580.573	56.581.772	41.216.232	31.999.386	28.859.818	29.726.256	29.789.115	27.994.316
Inversión Total actualizada a Enero 2016 (miles de €)	59.179.540	60.992.176	60.937.278	60.316.169	42.576.367	32.383.378	28.461.359	29.258.126	29.700.015	27.944.316
Inversión en el Sector Forestal (miles de €)	1.413.787	1.556.929	1.741.980	1.552.076	1.088.776	1.011.645	992.658	873.348	972.087	850.793
Inversión en el Sector Forestal actualizada a Enero 2016 (miles de €)	1.600.407	1.690.825	1.876.113	1.654.513	1.124.706	1.023.784	978.952	859.595	969.180	850.793

Tabla 2. Fuente: Administraciones competentes, INE y elaboración propia.

Inversión en el sector forestal por habitante (€/hab)

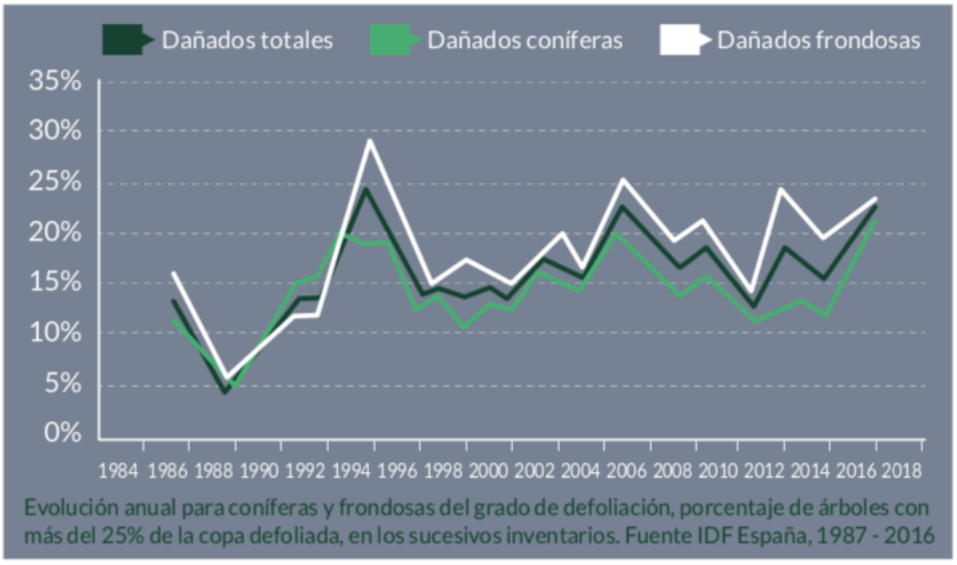


The impact of the work carried out by Biosilva Agroforestal covers both forestry harvesting in private forests and the mobilisation of resources from Public Administrations, either through grants or direct investment.

Biosilva Agroforestal also outsources the execution of certain works or buys the material already transformed from local companies, generating an economic chain.

And al though Biosilva Agroforestal has mostly formed its work teams, who are already specialised in the work carried out by the company, it is always necessary to complete the teams with local personnel from the area where the work is carried out. In addition, the

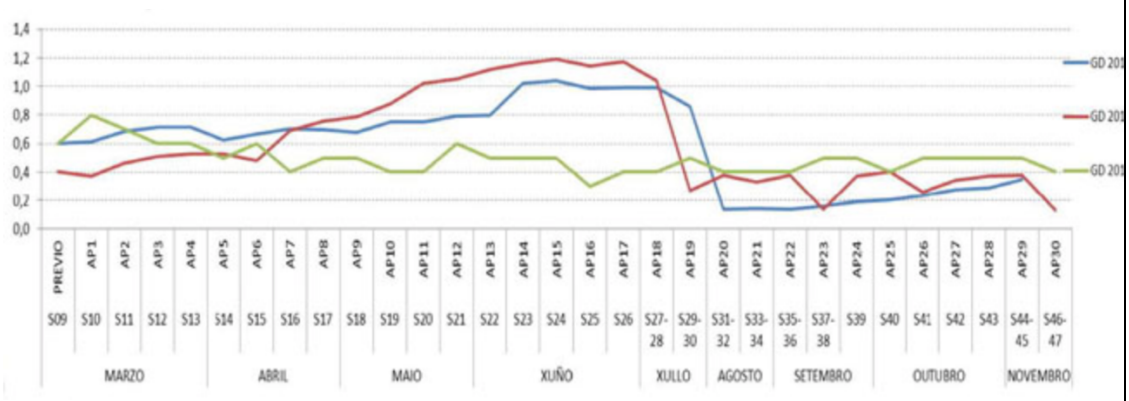
	displacement of the teams has a positive impact on local economies as they relocate to the work areas. In view of all the information above, the risk related to this indicator is classed as low.
Means of Verification	• Analysis of the contribution to the local economy. • Description of the direct economic value created • Records of personnel and jobs created
Evidence Reviewed	ASEMFO, Employment and investment study in the forestry sector: http://www.asemfo.org (http://www.asemfo.org/empresas/asemfo/X_estudio_DEF_web.pdf) Government of Spain: • Ministry of Agriculture, Fisheries and Food: https://www.mapa.gob.es/es/ • Ministry for Ecological Transition: https://www.miteco.gob.es/es/ • Biodiversity: https://www.miteco.gob.es/es/biodiversidad/temas/ • Forestry statistics: https://www.miteco.gob.es/es/biodiversidad/estadisticas/ • Forestry Statistical Yearbooks: https://www.mapa.gob.es/es/desarrollo-rural/estadisticas/forestal_anuarios_todos.aspx • Forestry Statistical Yearbook 2016: https://www.mapa.gob.es/es/desarrollo-rural/estadisticas/forestal_anuario_2016.aspx • Forestry economy and foreign trade: https://www.mapa.gob.es/es/desarrollo-rural/estadisticas/forestal_econ_comercio_exterior.aspx Spanish Society of Forest Sciences (http://secforestales.org/content/informe-isfe): • Report on the state of woods and the forestry sector in Spain 2013 (ISFE) • ISFE 2017 Progress Report Article with global data of the timber industry: https://www.asturias.es/RecursosWeb/trabajastur/Estudios%20Sectoriales/Documentos/Actualizacion_Forestal_madera_2015.pdf
Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
2.4.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that the health, vitality and other services provided by forest ecosystems are maintained or improved (CPET S7a).
Finding	According to current reports, the phytosanitary situation of Spanish forests has recently worsened due to drought, starting from a situation of no concern in terms of tree mortality. The introduction of foreign pests and pathogens and climate change are currently the main threats to the health of our forests, along with forest fires. Changes in climate are changing the dynamics of alterations caused by native insects and forest pathogens, as well as facilitating the establishment and spread of introduced species of pests. Such changes in the dynamics of alterations, coupled with the direct impact of climate change on trees and forest ecosystems, can have negative effects and increase the vulnerability of forests to other disturbances. The introduction of dangerous invasive alien species into our forests continues. New organisms, such as the bacterium *Xylella fastidiosa*, the chestnut gall wasp (*Dryocosmus kuriphilus*) or the western conifer seed bug (*Leptoglossus occidentalis*), have recently joined other quarantined organisms detected, such as the pine wood nematode (*Bursa- phelenchus xylophilus*) or the pine pitch canker (*Fusarium circinatum*) or the brown spot needle blight (*Mycrosphaerella dearnessii*) and red band needle blight (*Mycosphaerella pini*) that seriously affect the plantations of pino radiata in the Basque Country and Navarra, or the eucalyptus snout beetle (*Gonipterus platensis Marelli*). The graph below, taken from the report on the state of forests in Spain produced by the Spanish Society of Forest Sciences, shows how the percentage of trees with more than 25% defoliated canopy increased significantly between 2015 and 2017, from 15% to values close to 25%, with the increase being particularly pronounced in conifers.  Evolución anual para coníferas y frondosas del grado de defoliación, porcentaje de árboles con más del 25% de la copa defoliada, en los sucesivos inventarios. Fuente IDF España, 1987 - 2016 The level of control by the forestry authority is medium/high throughout the whole country. Therefore, the Spanish regulations and the surveillance procedures carried out by the Autonomous Communities are coherent. There is a systematic legal framework, with action plans implemented at government level to manage the main problems detected and a data monitoring network (European Forest Damage Monitoring Network). The Ministry of Agriculture has a specific section dedicated to Plant Health, which develops regulations, guidelines, protocols and monitoring studies of the different pests/diseases detected; and in turn, in each of the autonomous communities there are specific departments that monitor and study these aspects.

Examples of these tasks of the public administrations are listed below:

- Integrated Pest Management Guidelines, MAPA Forestry Group: https://www.mapa.gob.es/eu/agricultura/temas/sanidad-vegetal/productos-fitosanitarios/guias-gestion-plagas/forestales/
- Plant Health, Pine Wood Nematode, from the MAPA, which includes information on the demarcated areas of Spain: https://www.mapa.gob.es/es/agricultura/temas/sanidad-vegetal/nematodo-de-la-madera-del-pino/
- Pine Wood Nematode Contingency Plan, from the MAPA: https://www.mapa.gob.es/es/agricultura/temas/sanidad-vegetal/pnc_nmp_aprobadocfndic_2018_tcm30-510805.pdf
- Interreg Sudoe Plurifor Project, in which public administrations (Government of Galicia, Basque Government, Government of Asturias,…), associations and private entities are represented with the aim of helping to produce regional and transnational risk management plans for forest areas susceptible to biotic and abiotic risks: https://plurifor.efi.int/es/sobre-nosotros/
- Plurifor development on the Eucalyptus Snout Beetle: https://plurifor.efi.int/es/gorgojo-del-eucalipto/

For example the eucalyptus snout beetle is combated by biological control through the *Anaphes nitens/Anaphes inexpectatus* a natural parasitic wasp of the snout beetle. In 2018, the Government of Galicia positioned a total of 9,000 bags with oothecae (egg cases) of 'Gonipterus' parasitized with the 'Anaphes nitens', the inset that combats the snout beetle, an initiative added to the work of the forestry sector, industry and associations of forest owners. According to the latest data available, although the Snout Beetle is still present in general, there is some improvement in the number of cases in Galicia (http://www.campogalego.com/es/forestal-es/el-gorgojo-del-eucalipto-permanece-raya-pero-preocupa-la-mycosphaerella/):



Comparison chart showing the defoliation caused by the snout beetle in 2018, 2017 and 2016

The scope of this evaluation is the impact / effect of forestry operations on the indicators evaluated Forestry operations normally have a positive impact on the control of forest diseases. Furthermore, as already mentioned, there are manuals of good forestry practices implemented, monitoring results, examples of implementing legislation, reports and action plans related to the main diseases and pests.

With regards Biosilva specifically, the organisation always pays a prior visit to the forests in which it is going to work or those from which it is going to purchase material and, if there is a significant presence of pests of disease, it rules the forest out.

Pine wood from the Basque Country has been excluded from the scope of this risk analysis due to the existing situation with red and brown needle bands that seriously affect the populations of *Pinus radiata*, especially in Guipúzcoa, with estimates in April 2019 of up to 100,000 hectares affected to varying degrees.

In turn, it must be noted that the Government of Galicia has established a quarantine zone affected by the pine nematode in *Pinus pinaster* stands in the south of the province of Pontevedra, districts of the County, Baixo Miño, Val Miñor, Vigo and A Paradanta, under Ruling

	8/2019, of December 28 2018. The affected area is shown on the viewer of the Government of Galicia for forestry harvesting and it must comply with the legislation concerning the pine nematode: Decision 2012/535/EU and Decree 10/2011. Obviously, material from this quarantine zone cannot be included in the SBP supplies. Therefore, it is concluded that the situation is being addressed by classifying the risk related to this indicator as low.
Means of Verification	• Existing legal framework. Laws, regulations and control bodies • Assessment of the potential impacts of forestry operations on the health and vitality of forests. • Assessment of potential impacts at site level and of the measures taken to minimise them • Good Environmental Practices in Sustainable Forest Management • Contracts with suppliers • Information received from suppliers • Monitoring results • Consultation with experts
Evidence Reviewed	Spanish Society of Forest Sciences: • http://secforestales.org/content/informe-isfe • Report on the situation of forests and the forestry sector in Spain 2013 (ISFE) • ISFE 2013 Executive Report • ISFE 2017 Progress Report European Forest Damage Network, Level I: http://www.mapama.gob.es/es/desarrollo-rural/temas/politica-forestal/inventario-cartografia/redes-europeas-seguimiento-bosques/red_nivel_I_danos.aspx European Forest Damage Network, Network Results of Level II: http://www.mapama.gob.es/es/desarrollo-rural/temas/politica-forestal/inventario-cartografia/redes-europeas-seguimiento-bosques/red_nivel_II_resultados.aspx MAPAMA: • Plant Health: http://www.mapama.gob.es/es/agricultura/temas/sanidad-vegetal/default.aspx • Pine Wood Nematode: http://www.mapama.gob.es/es/agricultura/temas/sanidad-vegetal/nematodo-de-la-madera-del-pino/ Law 43/2002 on Plant Health: http://www.boe.es/buscar/act.php?id=BOE-A-2002-22649 Junta de Andalucía, Plant Health: http://www.juntadeandalucia.es/organismos/agriculturapescaydesarrollorural/areas/agricultura/sanidad-vegetal.html Valencian Community, Plant Health: http://www.agroambient.gva.es/es/sanidad-vegetal Region of Murcia, Plant Health: https://www.carm.es/web/pagina?IDCONTENIDO=222&IDTIPO=140&RASTRO=c32$m Castilla La Mancha, Plant Health: http://www.castillalamancha.es/gobierno/agrimedambydesrur/actuaciones/sanidad-vegetal Galicia, Plant Health: http://mediorural.xunta.gal/es/areas/forestal/silvicultura/sanidad_forestal/ Galicia, Xunta pine nematode ruling: https://www.xunta.gal/dog/Publicados/2019/20190111/AnuncioG0426-080119-0001_es.html Asturias, Plant Health: https://www.asturias.es/portal/site/webasturias/menuitem.88301fb4c77d60f14454dc407720a0a0/?vgnextoid=6e63fbfc8b6bd210VgnVCM1000002f030003RCRD&i18n.http.lang=es Euskadi: Bizkaia Provincial Council, Plant Health: http://www.bizkaia.eus/home2/Temas/DetalleTema.asp?Tem_Codigo=5504&idioma=CA&dpto_biz=2&codpath_biz=2%7C201%7C5504 Guipuzkoa Provincial Council, Plant Health: https://www.gipuzkoa.eus/es/web/landarealorra/sanidad-vegetal Araba Provincial Council, Plant Health: https://web.araba.eus/es/agricultura/sanidad-vegetal

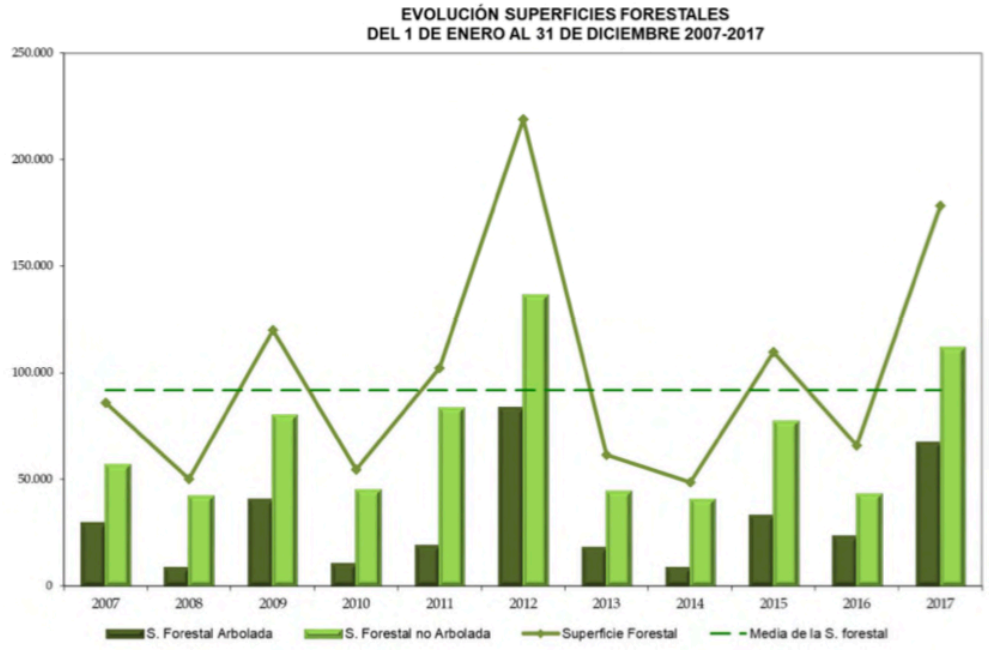
	Notice on the "pine pest": https://www.elcorreo.com/bizkaia/gobierno-vasco-alerta-20190401184406-nt.html Interreg Sudoe Plurifor Project: • Plurifor https://plurifor.efi.int/es/sobre-nosotros/ • Eucalyptus Snout Beetle: https://plurifor.efi.int/es/gorgojo-del-eucalipto/ Integrated Pest Management Guidelines, MAPA Forestry Groups: https://www.mapa.gob.es/eu/agricultura/temas/sanidad-vegetal/productos-fitosanitarios/guias-gestion-plagas/forestales/
Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
2.4.2	The Biomass Producer has implemented appropriate control systems and procedures for verifying that natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b).
Finding	With regards pests and diseases, see indicator 2.4.1 which certifies the existence of a clear, regulatory framework, action plans and data monitoring networks, and competent administrations responsible for data management and control. Therefore, it is generally considered that there is adequate pest and disease management in place, bearing in mind that a large part of the responsibility in this regard lies with public administrations. With regards forest fires, it cannot be denied that that they currently represent one of the greatest threats to forests in Spain. Climate change is expected to affect, and probably already does affect, the susceptibility of forests to disturbances, as well as the frequency, intensity, duration and timing of these disturbances. For example, there may be increased fuel accumulation in forests, the fire seasons may last for longer and more extreme weather conditions may occur more frequently. In addition, the frequency and intensity of forest fires is also expected to increase. The current trend is for forests to offer an increasingly dangerous vegetation structure in this regard, as they accumulate the fine biomass that was once used to cover livestock feed and heating requirements, and have a greater spatial continuity of forest fuel, taking into account the vegetation being installed in previously ploughed fields. The data for 2017 indicates that the total number of incidents has increased by 11.57% compared to the average for the last decade, with an increase of 5.80 % in the number of outbreaks (area ≤1 ha) and 23.05 % in the number of fires (area > 1 ha) respectively. It was the year with the third highest number of incidents of the last decade.

	MEDIA DEL DECENIO 2007-2017 (01/01/-31/12)	**AÑO 2017 (01/01-31/12)**
Nº CONATOS (<1 ha)	8.228	8.705
Nº INCENDIOS (≥1 ha)	4.135	5.088
TOTAL SINIESTROS	**12.363**	**13.793**

As for the areas affected, there is an increase compared to the average, of 145% in woodland and 94% in forest area. 2017 has the second highest percentage of the decade in terms of area affected.

	MEDIA DEL DECENIO 2007-2017 (01/01/-31/12)	AÑO 2017 (01/01-31/12)
S. ARBOLADA (ha)	27.226,41	66.839,02
S. FORESTAL (ha)	91.846,74	178.233,93



According to the provisional statistics provided by the competent services of the regional administrations, in 2017 there were 56 Major Forest Fires (MFFs), a category that includes fires exceeding 500 hectares of forest affected. In total the registered MFFs accounted for 54.96% of the total area affected and 0.41% of the total number of incidents. Northwest Spain was the area hit hardest by MFFs, with 73.21% of them taking place there and 74.54% of the area burned by them. In October alone, there were 31 MFFs (55% of the annual total), all in the Northwest region.

According to the data, it seems that the recurrence of catastrophic years in terms of fires in Spain, is about every 5 years, the last two being 2012 (which affected Castilla y León and the Valencian Community in particular) and 2017 (which affected the Northwest of the peninsula in particular: Galicia, Asturias, León).

At management level, a large extent of the responsibility for forest fires lies with public administrations. However, forest owners have certain responsibilities for the proper management of the forest and of fire prevention and defence infrastructures. The analysis of this indicator will focus on these issues, resulting from forestry operations.

On forests management level we can make next clasification:

1. Public forests in which BIOSILVA AGROFORESTAL works. The administration itself is the manager of these forests and is therefore responsible for maintaining adequate defence and prevention infrastructure. In this respect, the level of implementation of these infrastructures can be considered adequate.
2. Private forests. All the existing legislation determines specific obligations or responsibilities of forest managers/owners concerning prevention/defence against forest fires:

	• In Andalucía the law requires the preparation of Forest Fire Prevention Plans or Management Plans and the implementation of the prevention/defence measures established either in this document or in the Plans drawn up by the administration. Failure to comply with this means that in the event of a fire the Government of Andalusia will charge the owner for the costs of extinguishing the fire. IN addition, there is the ruling of the General Directorate for the Natural Environment and Protected Areas of June 21 2018, which approves preventive measures for forestry work and harvesting in times of high risk of fire and which requires the executing companies to follow the measures specified therein. The INFOCA Plan of the Government of Andalusia establishes restrictions on forestry work during the time of year when there is a risk of forest fires. • In the Valencian Community the planning of the actions is carried out by the Generalitat Valenciana through the approval of forest fire sectoral plans and the possibility for municipalities to draw up local fire plans, subject to the sectoral plans. Forest land owners and local entities in areas at high risk of forest fires shall be obliged to adopt appropriate measures to prevent forest fires and shall carry out, at their own cost, the corresponding work in the manner, within the time limits and under the conditions established in the fire prevention plans. • In Murcia, the forestry administration produces the statement of the High-Risk Areas, as well as approving the defence plans. These plans shall establish the preventive work to be carried out, including the appropriate forestry treatments, firebreak areas, access roads and water points to be carried out by the owners of the forests in the area, the execution timeframes, and the methods for executing the work, depending on the legal status of the land, by means of treaties, agreements, temporary assignments of the land to the Administration, aid or grants or, where appropriate, subsidiary execution by the Administration. • In Galicia, and with regards micro-ownership, the Forestry Law of Galicia establishes distances that the plantations must adhere to away from homes, roads, waterways… It is the responsibility of the owners to comply with these indications in new plantations. In turn, the Government of Galicia establishes a daily forest fire risk index (IRDI). Therefore, in private forests, the forest owners are responsible for planning and maintaining the fire prevention and defence structures. In turn, forestry companies must comply with a series of requisites when working in the forests in summer. It is regarding these matters that both planning and management deficiencies have been detected. Therefore, the following level of risk is defined: • low for pest and disease management • low for forest fire management in publicly managed forests • specified for forest fire management in privately managed forests
Means of Verification	• Existing legal framework. Laws, regulations and control bodies • Assessment of the potential impacts of forestry operations on the health and vitality of forests. • Assessment of potential impacts at site level and of the measures taken to minimise them • Good Environmental Practices in Sustainable Forest Management • Contracts with suppliers • Information received from suppliers • Monitoring results and statistical data available • Consultation with experts
Evidence Reviewed	MAPAMA: • Forest fires: http://www.mapama.gob.es/es/desarrollo-rural/temas/politica-forestal/incendios-forestales/ • Forest fire regulations: http://www.mapama.gob.es/es/desarrollo-rural/legislacion/leg-espanola-forestal-incendios.aspx • Forest Fire Statistics: http://www.mapama.gob.es/es/desarrollo-rural/estadisticas/Incendios_default.aspx

	• Forest fire data 2017. Update: http://www.mapama.gob.es/es/desarrollo-rural/estadisticas/iiff_2017_def_tcm30-446071.pdf Forestry Law consolidated text (Forestry Law 43/2003 amended by Laws 10/2006, of 28 April and 21/2015, of 20 July): https://www.boe.es/buscar/act.php?id=BOE-A-2003-21339 Law 2/1992, of 15 June, Forestry law of Andalucía: https://www.boe.es/buscar/act.php?id=BOE-A-1992-15996 Law 5/1999 on the Prevention and Combatting of Forest Fires in Andalucía: https://www.boe.es/buscar/pdf/1992/BOE-A-1992-15996-consolidado.pdf Law 3/1993, of 9 December, of the Generalitat Valenciana, Forestry Law of the Valencian Community consolidated text: http://www.dogv.gva.es/auto/dogv/docvpub/rlgv/1993/L_1993_03_ca_L_2017_21.pdf Natural Murcia, Forest Fires: http://www.murcianatural.carm.es/web/guest/incendios/-/asset_publisher/3gYZ/content/177551;jsessionid=99077A1418A1146D4B25ADA9318B2EF8?_101_INSTANCE_3gYZ_redirect=%2Fweb%2Fguest%2Fincendios&assetId=177551#.XNlKWS8rw_U Law 3/2008, of June 12, on Forests and Sustainable Forestry Management of Castilla-La Mancha: https://www.boe.es/buscar/act.php?id=BOE-A-2008-13685&p=20091223&tn=2 Fire Regulations Castilla La Mancha: http://www.castillalamancha.es/gobierno/agrimedambydesrur/estructura/dgapfyen/actuaciones/documentos-y-normativa-en-materia-de-incendios-forestales Law 7/2017 on Forests of Galicia, consolidated text: https://www.boe.es/buscar/pdf/2012/BOE-A-2012-11414-consolidado.pdf Law 3/2007 forest fires Galicia_BOE-A-2007-10022-consolidated: http://mediorural.xunta.gal/fileadmin/arquivos/publicacions/2013/LeiDeIncendios/cast/Ley_03-07_de_prevenc_y_defensa_contra_los_incend__castellano_.pdf Rural Environment, Government of Galicia, Forest Fires: https://mediorural.xunta.gal/es/areas/forestal/incendios_forestales/ Law 3/2004, of November 23, on forests and forestry planning of Asturias: https://www.boe.es/buscar/pdf/2005/BOE-A-2005-393-consolidado.pdf Forestry Policy, Asturias: https://www.asturias.es/portal/site/webasturias/menuitem.4b280f8214549ead3e2d6f77f2300030/?vgnextoid=1530d4e871b59210VgnVCM10000097030a0aRCRD&vgnextchannel=11df7e1385dfe210VgnVCM10000097030a0aRCRD&i18n.http.lang=es Regulations, General Directorate of the Natural Environment, Cantabria: http://dgmontes.org/normativa Strategic Plan for the Prevention and Control of Forest Fires, Cantabria 2017-2020: https://sede.cantabria.es/documents/16835/0/PEPLIF+definitivo/f59aaba4-4c5c-9e65-6914-bbdef2221af4 Bizkaia Provincial Forestry Regulations: http://www.bizkaia.eus/lehendakaritza/Bao_bob/2007/03/20070328a062.pdf?hash=ae5851ea071e2972507a0f4a7e971fe9#page=3 Guipuzkoa Provincial Forestry Regulations: http://www4.gipuzkoa.net/ogasuna/normativa/docs/0000785c.pdf Araba Provincial Forestry Regulations: https://www.araba.eus/botha/Boletines/2007/044/2007_044_02377.pdf Special Emergency Plan for the risk of forest fires CAV: http://www.euskadi.eus/contenidos/informacion/planes_incendios/es_doc/adjuntos/301116PE%20Forestal%202016%20rdo%20Consejo%20Gob%20Rev%2020160920_cast-publicaciones.pdf Spanish Society of Forest Sciences: • http://secforestales.org/content/informe-isfe • Report on the situation of forests and the forestry sector in Spain 2013 (ISFE) • ISFE 2017 Progress Report

Risk Rating	☐ **Low Risk** ☒ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	It must be noted that the work carried out by Biosilva Agroforestal, forestry treatments, thinning and clearing, normally have a positive impact on the prevention of forest fires, as they reduce density and biomass in forest stands. In addition, Biosilva Agroforestal implements a Manual of good practices, which all its workers are familiar with, and which lists the measures to take to prevent their work from causing forest fires. In order to mitigate the defined risk, the need is established with regards work on private properties, for Biosilva Agroforestal to take the following steps: 4. Check that the property complies with its obligations in terms of fire prevention and defence: Prevention Plans,… 5. If it does, the work can go ahead, making sure in turn that the company carrying out the work complies with the obligations established by State Legislation and that of the Autonomous Communities/Provincial Departments, such as that established in the ruling of the General Directorate for the Environment and Protected Areas of 21 June 2018 of the Government of Andalusia 6. If it does not: ✓ the material is rejected within the SBP risk analysis or ✓ the legislation is complied with (Prevention plan,…) before the work is carried out. In this case, making sure in turn that the company carrying out the work complies with the obligations established by State Legislation and that of the Autonomous Communities/Provincial Departments, such as that established in the ruling of the General Directorate for the Environment and Protected Areas of 21 June 2018 of the Government of Andalusia.

	Indicator
2.4.3	The Biomass Producer has implemented appropriate control systems and procedures for verifying that there is adequate protection of the forest from unauthorised activities, such as illegal logging, mining and encroachment (CPETS7c).
Finding	There are no significant problems in Spain with regards unauthorised or illegal activities in forests such as logging, mining or illegal occupation. Small-scale problems are identified, such as unauthorised sports activities, theft of firewood, wood or fruit, poaching, fly-tipping, feral dogs... Illegal or unauthorised activities have a small impact on Spanish forests and there are no reports of situations of substantial magnitude with regards this issue. Therefore, the risk related to this indicator is classed as low.
Means of Verification	• Records of field inspections and monitoring • Interviews with workers • Interviews with relevant parties • Public information available (media)
Evidence Reviewed	Illegal Logging Portal, Spain: https://www.illegal-logging.info/regions/spain Transparency International . IPC Spain: https://www.transparency.org/country/ESP
Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
2.5.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that legal, customary and traditional tenure and use rights of indigenous people and local communities related to the forest are identified, documented and respected (CPET S9).
Finding	In Spain there are many ancient customary rights linked to the forests of the Iberian Peninsula. There are no relevant conflicts related to these rights and where they exist there are established channels for their management and resolution. Many of these uses have died out due to disuse or they simply exist, but are not exercised and others have been integrated into the management of the forests (public roads, firewood, communal management…). An example of these uses is the Communal Forests, both Roman and Germanic, which have been gradually recovered since the establishment of democracy in 1977. Where communities have been able to demonstrate common use by local residents, they have been declared Neighbourhood Forests. There are Neighbourhood Forest Boards and legislation to regulate their activity. There are many forestry associations or similar groups, at local or regional level, that carry out important work in the recovery or maintenance of customary uses of forests. There are no indigenous peoples or minority groups in Spain that required special protection in terms of their use rights of the forests, and there are no local communities that depend on the services of the forests in order to survive. Therefore, the risk related to this indicator is classed as low.
Means of Verification	• Customary rights, when applicable, are identified and documented • Interviews with local communities or other relevant parties • There are appropriate procedures in place to resolve any conflicts
Evidence Reviewed	Forestry Law consolidated text (Forestry Law 43/2003 amended by Laws 10/2006, of 28 April and 21/2015, of 20 July): https://www.boe.es/buscar/act.php?id=BOE-A-2003-21339 Civil Code: https://www.boe.es/buscar/pdf/1889/BOE-A-1889-4763-consolidado.pdf Law 2/1992, of 15 June, Forestry law of Andalucía: https://www.boe.es/buscar/act.php?id=BOE-A-1992-15996 Law 3/1993, of 9 December, of the Generalitat Valenciana, Forestry Law of the Valencian Community consolidated text: http://www.dogv.gva.es/auto/dogv/docvpub/rlgv/1993/L_1993_03_ca_L_2017_21.pdf Law 3/2008, of June 12, on Forests and Sustainable Forestry Management of Castilla-La Mancha: https://www.boe.es/buscar/act.php?id=BOE-A-2008-13685&p=20091223&tn=2 Law 7/2017 on Forests of Galicia, consolidated text: https://www.boe.es/buscar/pdf/2012/BOE-A-2012-11414-consolidado.pdf Law 3/2004, of November 23, on forests and forestry planning of Asturias: https://www.boe.es/buscar/pdf/2005/BOE-A-2005-393-consolidado.pdf Regulations, General Directorate of the Natural Environment, Cantabria: http://dgmontes.org/normativa Bizkaia Provincial Forestry Regulations: http://www.bizkaia.eus/lehendakaritza/Bao_bob/2007/03/20070328a062.pdf?hash=ae5851ea071e2972507a0f4a7e971fe9#page=3 Guipuzkoa Provincial Forestry Regulations: http://www4.gipuzkoa.net/ogasuna/normativa/docs/0000785c.pdf Araba Provincial Forestry Regulations: https://www.araba.eus/botha/Boletines/2007/044/2007_044_02377.pdf
Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
2.5.2	The Biomass Producer has implemented appropriate control systems and procedures for verifying that production of feedstock does not endanger food, water supply or subsistence means of communities, where the use of this specific feedstock or water is essential for the fulfilment of basic needs.
Finding	With regards this indicator, only the protection of the headwaters of the hydrographic basins in the driest areas of southern and eastern Spain is considered applicable. These areas normally have protected reforested areas carried out by the state administration and are protected by both national and regional legislation. In addition, they are usually public forests managed by the administration itself (in fact, these forests are one of the types of forests that can be included in the catalogue of public utility forests). In any case, operations in these forests require prior authorisation from the competent administration and inspection by the authority agents. Therefore the risk related to this indicator is classed as low
Means of Verification	• Existing legal framework. Laws, regulations and control bodies • Technical Specifications for the allocation of the public forest works contract • Forestry work/harvesting authorisation
Evidence Reviewed	Forestry Law consolidated text (Forestry Law 43/2003 amended by Laws 10/2006, of 28 April and 21/2015, of 20 July): https://www.boe.es/buscar/act.php?id=BOE-A-2003-21339 MAPAMA, Regulatory Framework for Hydrological Planning: http://www.mapama.gob.es/es/agua/legislacion/Marco_normativo_planificacion.aspx Law 2/1992, of 15 June, Forestry law of Andalucía: https://www.boe.es/buscar/act.php?id=BOE-A-1992-15996 Law 3/1993, of 9 December, of the Generalitat Valenciana, Forestry Law of the Valencian Community consolidated text: http://www.dogv.gva.es/auto/dogv/docvpub/rlgv/1993/L_1993_03_ca_L_2017_21.pdf Law 3/2008, of June 12, on Forests and Sustainable Forestry Management of Castilla-La Mancha: https://www.boe.es/buscar/act.php?id=BOE-A-2008-13685&p=20091223&tn=2 Law 7/2017 on Forests of Galicia, consolidated text: https://www.boe.es/buscar/pdf/2012/BOE-A-2012-11414-consolidado.pdf Law 3/2004, of November 23, on forests and forestry planning of Asturias: https://www.boe.es/buscar/pdf/2005/BOE-A-2005-393-consolidado.pdf Regulations, General Directorate of the Natural Environment, Cantabria: http://dgmontes.org/normativa Bizkaia Provincial Forestry Regulations: http://www.bizkaia.eus/lehendakaritza/Bao_bob/2007/03/20070328a062.pdf?hash=ae5851ea071e2972507a0f4a7e971fe9#page=3 Guipuzkoa Provincial Forestry Regulations: http://www4.gipuzkoa.net/ogasuna/normativa/docs/0000785c.pdf Araba Provincial Forestry Regulations: https://www.araba.eus/botha/Boletines/2007/044/2007_044_02377.pdf
Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
2.6.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that appropriate mechanisms are in place for resolving grievances and disputes, including those relating to tenure and use rights, to forest management practices and to work conditions.
Finding	In Spain there are clear and well-known legal channels for resolving conflicts that are also regulated by the corresponding laws. The legal framework of reference regarding land use and ownership rights, forest management activities and workers' conditions includes, among others: • Civil Code • Spanish Constitution • Forestry Law of the State and of the Autonomous Communities • Workers' Statute The exiting legal framework and different laws clearly define the responsibilities and duties of the people involved in these matters, as well as providing a clear framework for appeals or complaints in the event of disputes concerning these issues. In addition, Biosilva Agroforestal has a complaint handling procedure integrated in its various quality certificates: ISO 9001, ISO 14001 and OSHAS 18001, as well as the FSC chain of custody. Therefore, the risk related to this indicator is classed as low.
Means of Verification	• Existing legal framework • Level of governance • Manuals of good forestry practices • Existence of contracts
Evidence Reviewed	Civil Code: https://www.boe.es/buscar/pdf/1889/BOE-A-1889-4763-consolidado.pdf Spanish Constitution: https://www.boe.es/buscar/pdf/1978/BOE-A-1978-31229-consolidado.pdf Workers' Statute: https://www.boe.es/buscar/pdf/2015/BOE-A-2015-11430-consolidado.pdf Forestry Law consolidated text (Forestry Law 43/2003 amended by Laws 10/2006, of 28 April and 21/2015, of 20 July): https://www.boe.es/buscar/act.php?id=BOE-A-2003-21339 Law 2/1992, of 15 June, Forestry law of Andalucía: https://www.boe.es/buscar/act.php?id=BOE-A-1992-15996 Law 3/1993, of 9 December, of the Generalitat Valenciana, Forestry Law of the Valencian Community consolidated text : http://www.dogv.gva.es/auto/dogv/docvpub/rlgv/1993/L_1993_03_ca_L_2017_21.pdf Law 3/2008, of June 12, on Forests and Sustainable Forestry Management of Castilla-La Mancha: https://www.boe.es/buscar/act.php?id=BOE-A-2008-13685&p=20091223&tn=2 Law 7/2017 on Forests of Galicia, consolidated text: https://www.boe.es/buscar/pdf/2012/BOE-A-2012-11414-consolidado.pdf Law 3/2004, of November 23, on forests and forestry planning of Asturias: https://www.boe.es/buscar/pdf/2005/BOE-A-2005-393-consolidado.pdf Regulations, General Directorate of the Natural Environment, Cantabria: http://dgmontes.org/normativa Bizkaia Provincial Forestry Regulations: http://www.bizkaia.eus/lehendakaritza/Bao_bob/2007/03/20070328a062.pdf?hash=ae5851ea071e2972507a0f4a7e971fe9#page=3 Guipuzkoa Provincial Forestry Regulations: http://www4.gipuzkoa.net/ogasuna/normativa/docs/0000785c.pdf Araba Provincial Forestry Regulations: https://www.araba.eus/botha/Boletines/2007/044/2007_044_02377.pdf Spanish Employment and Social Security Legislation: https://www.boe.es/legislacion/codigos/codigo.php?id=93&modo=1&nota=0&tab=2

Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
2.7.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that Freedom of Association and the effective recognition of the right to collective bargaining are respected.
Finding	Labour rights are adequately protected in Spain, including those specified in the ILO's fundamental principles. Spain has ratified the ILO's eight Fundamental Conventions. However, there are some concerns over civil rights in Spain, as reflected in reports by international organisations like Amnesty International (see the 2017 report on Spain), but none of the concerns is directly related to the forestry sector. In 2014, the International Trade Union Confederation (ITUC) published a report on working conditions in 139 countries, carrying out a study using 97 internationally-recognised indicators. Spain was given a score of 2 on a scale of 1 to 5 (where 1 is the highest score). A score of 2 means that there are repeated violations of rights, and that those violations can affect improvements in working conditions ("Certain rights have come under repeated attack by governments and / or companies and have undermined the struggle for better working conditions."). One of the fundamental legal principles that underpins the current system of labour relations in Spain is the one contained in section 1, article 28 of the Spanish Constitution, which recognises freedom of association as being a fundamental right for all people to freely form trade unions. Article 37 of the Constitution, together with articles 35 and 38, covers the constitutional framework of labour relations. Pursuant to that precept, the law must guarantee the right to collective labour bargaining and the binding force of conventions, in addition to recognising the rights of workers and businesspeople to take industrial action. The law that regulates the exercise of that right, without prejudice to the limitation that may be set, shall include the guarantees needed to ensure the functioning of the community's essential services. There is also a Government of Spain Plan to fight illegal working and Social Security fraud. Labour inspectors form the Government-appointed authority to check labour and safety rights. Companies are inspected in respect of those matters, with violations being sanctioned and corrected. No relevant violations were found of the laws or rights of free association and collective bargaining in relation to the forestry sector. Accordingly, the risk relating to the indicator is classified as low.
Means of Verification	• Existing legal framework and level of governance • Contracts of employment • The existence of a collective-bargaining agreement • Company policies • Interviews with Heads of Human Resources • Interviews with workers
Evidence Reviewed	ILO Spain: http://www.ilo.org/madrid/oit-en-españa/lang--es/index.htm ILO Conventions: http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--es/index.htm ITUC Global Rights Index: The world's worst countries for workers: http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf

	Spanish Constitution: https://www.boe.es/buscar/pdf/1978/BOE-A-1978-31229-consolidado.pdf Workers' Statute: https://www.boe.es/buscar/pdf/2015/BOE-A-2015-11430-consolidado.pdf Spanish Labour and Social Security Legislation: https://www.boe.es/legislacion/codigos/codigo.php?id=93&modo=1&nota=0&tab=2 http://www.congreso.es/consti/constitucion/indice/sinopsis/sinopsis.jsp?art=37&tipo=2 https://www.iberley.es/temas/contenido-caracteres-derecho-sindical-negociacion-colectiva-11381 Ministry of Labour , Migration and Social Security, Collective Negotiation Guide 2018: http://www.mitramiss.gob.es/es/sec_trabajo/ccncc/B_Actuaciones/Guia/GuiaNC_2018_web.pdf Ministry of Labour, Migration and Social Security, Strategic Plan of the Labour and Social Security Inspectorate: http://www.mitramiss.gob.es/itss/web/Documentos/ORGANISMO_ESTATAL/Doc_Organismo/Plan_Estrat_formato.pdf
Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
2.7.2	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not supplied using any form of compulsory labour.
Finding	Labour rights are adequately protected in Spain, including those specified in the ILO's fundamental principles. Spain has ratified the ILO's eight Fundamental Conventions. However, there are some concerns over civil rights in Spain, as set out in reports from international organisations like Amnesty International (see the 2017 report on Spain), but none of the concerns is directly related to the forestry sector. In 2014, the International Trade Union Confederation (ITUC) published a report on working conditions in 139 countries, carrying out a study using 97 internationally-recognised indicators. Spain was given a score of 2 on a scale of 1 to 5 (where 1 is the highest score). A score of 2 means that there are repeated violations of rights, and that those violations can affect improvements in working conditions ("Certain rights have come under repeated attack by governments and / or companies and have undermined the struggle for better working conditions."). Spain has long experience of fighting forced labour. It was one of the first countries to ratify the 1930 Convention on Forced Labour (No. 29), doing so in 1932. It has developed a solid legal and institutional framework to fight human trafficking, especially with the constant adaptation of the relevant repressive provisions of the Criminal Code, through the adoption in 2009 of an initial Integral Plan against human trafficking, and with the specific role played by the labour inspectorate in detecting criminal conditions arising from exploitation at work or human trafficking. There is a Government of Spain Plan to fight illegal working and Social Security fraud. Labour inspectors form the Government-appointed authority to check labour and safety rights. Companies are inspected in respect of those matters, with violations being sanctioned and corrected. No relevant violations have been found of the laws on forced labour in relation to the forestry sector. Accordingly, the risk relating to the indicator is classified as low.

Means of Verification	• Existing legal framework and level of governance • Contracts of employment • Contracts with suppliers • Records of field inspections and monitoring • Interviews with workers
Evidence Reviewed	ILO Spain: http://www.ilo.org/madrid/oit-en-españa/lang--es/index.htm ILO Conventions: http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--es/index.htm ILO Forced Labour Spain: http://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/forced-labour/WCMS_575880/lang--es/index.htm ITUC Global Rights Index: The world's worst countries for workers: http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf Spanish Constitution: https://www.boe.es/buscar/pdf/1978/BOE-A-1978-31229-consolidado.pdf Workers' Statue: https://www.boe.es/buscar/pdf/2015/BOE-A-2015-11430-consolidado.pdf Spanish Labour and Social Security Legislation: https://www.boe.es/legislacion/codigos/codigo.php?id=93&modo=1&nota=0&tab=2 Ministry of Labour, Migration and Social Security, Strategic Plan of the Labour and Social Security Inspectorate: http://www.mitramiss.gob.es/itss/web/Documentos/ORGANISMO_ESTATAL/Doc_Organismo/Plan_Estrat_formato.pdf
Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
2.7.3	The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is not supplied using child labour.
Finding	Labour rights are adequately protected in Spain, including those specified in the ILO's fundamental principles. Spain has ratified the ILO's eight Fundamental Conventions. However, there are some concerns over civil rights in Spain, as set out in reports from international organisations like Amnesty International (see the 2017 report on Spain), but none of the concerns is directly related to the forestry sector. In 2014, the International Trade Union Confederation (ITUC) published a report on working conditions in 139 countries, carrying out a study using 97 internationally-recognised indicators. Spain was given a score of 2 on a scale of 1 to 5 (where 1 is the highest score). A score of 2 means that there are repeated violations of rights, and that those violations can affect improvements in working conditions ("Certain rights have come under repeated attack by governments and / or companies and have undermined the struggle for better working conditions."). Article 6 "Child Labour" of the Workers' Statute specifies: 1. Persons aged under 16 must not enter the world of work. 2. Workers aged under 18 cannot carry out night duties. They must also not carry out any work activities or fill any work posts that are covered by limitations on contracting persons aged under 18, pursuant to the provisions of Law 31 / 1995 of 8 November on Preventing Risks in the Workplace, and in applicable regulations.

	3. Persons aged under 18 must not do overtime. 4. Persons aged under 18 can only take part in public shows in exceptional cases subject to the labour authority, provided that doing so is not injurious to the health, professional development, and human development of those persons. Permission must be given in writing and for specific events." There is a Government of Spain Plan to fight illegal working and Social Security fraud. Labour inspectors form the Government-appointed authority to check labour and safety rights. Companies are inspected in respect of those matters, with violations being sanctioned and corrected. No relevant violations are found of the laws on child labour in relation to the forestry sector. Therefore, the risk related to this indicator is classified as low.
Means of Verification	• Existing legal framework and level of governance • Contracts of employment • Contracts with suppliers • Records of field inspections and monitoring • Interviews with workers
Evidence Reviewed	ILO Spain: http://www.ilo.org/madrid/oit-en-españa/lang--es/index.htm ILO Conventions: http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--es/index.htm ILO Forced Labour Spain: http://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/forced-labour/WCMS_575880/lang--es/index.htm ITUC Global Rights Index: The world's worst countries for workers: http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf Spanish Constitution: https://www.boe.es/buscar/pdf/1978/BOE-A-1978-31229-consolidado.pdf Workers' Statute: https://www.boe.es/buscar/pdf/2015/BOE-A-2015-11430-consolidado.pdf Spanish Labour and Social Security Legislation: https://www.boe.es/legislacion/codigos/codigo.php?id=93&modo=1&nota=0&tab=2 Ministry of Labour, Migration and Social Security, Strategic Plan of the Labour and Social Security Inspectorate: http://www.mitramiss.gob.es/itss/web/Documentos/ORGANISMO_ESTATAL/Doc_Organismo/Plan_Estrat_formato.pdf
Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
2.7.4	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not supplied using labour which is discriminated against in respect of employment and occupation.
Finding	Labour rights are adequately protected in Spain, including those specified in the ILO's fundamental principles. Spain has ratified the ILO's eight Fundamental Conventions. In 2014, the International Trade Union Confederation (ITUC) published a report on working conditions in 139 countries, carrying out a study using 97 internationally-recognised indicators. Spain was given a score of 2 on a scale of 1 to 5 (where 1 is the highest score). A score of 2 means that there are repeated violations of rights, and that those violations can affect improvements in working conditions ("Certain rights have come under repeated

	attack by governments and / or companies and have undermined the struggle for better working conditions."). Spain is well positioned in international reports: • a Corruption Perception Index score of 58. Perception of the level of corruption has increased noticeably in Spain over the last few years, although it remains clearly above 50, which means a relatively low level of perception; • The World Governance Indicators (WGIs) of the World Bank, with 2017 values of between 61.90 and 83.17 (1 – 100 points). The World Bank's WGI report has been prepared in 200 countries since 1996 and covers the following governance indicators: i) Voice and Accountability, ii) Political Stability and Absence of Violence / Terrorism, iii) Government Effectiveness, iv) Regulatory Quality, v) Rule of Law, and vi) Control of Corruption.) However, there are some concerns over civil rights in Spain, as set out in reports from international organisations like Amnesty International (see the 2017 report on Spain), but none of the concerns is directly related to the forestry sector. Spain does not appear in reports from international organisations (Global Witness, Human Rights Watch, Chatham House Illegal Logging portal) that cover activities relating to the forestry sector. According to information from Eurostat, Spain has a gender gap of 14.9% (the average gender salary gap in the EU is 16.3%). The gap continues to diminish; in 2002, it was 19%. In turn, the forestry and logging sector is the most masculinised, since just 6% of the people working in it are women. There is a Government of Spain Plan to fight illegal working and Social Security fraud. Labour inspectors form the Government-appointed authority to check labour and safety rights. Companies are inspected in respect of those matters, with violations being sanctioned and corrected. Based on available information, no evidence has been found to confirm relevant risks of employment discrimination in relation to the forestry sector. Accordingly, the risk relating to the indicator is classified as low.
Means of Verification	• Existing legal framework and level of governance • Contracts of employment • Contracts with suppliers • Records of field inspections and monitoring • Interviews with workers • Records of payments made
Evidence Reviewed	ILO Spain: http://www.ilo.org/madrid/oit-en-españa/lang--es/index.htm ILO Conventions: http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--es/index.htm ITUC Global Rights Index: The world's worst countries for workers: http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf Transparency international, CORRUPTION PERCEPTIONS INDEX 2018: https://www.transparency.org/cpi2018 Constitución Española: https://www.boe.es/buscar/pdf/1978/BOE-A-1978-31229-consolidado.pdf Workers' Statute: https://www.boe.es/buscar/pdf/2015/BOE-A-2015-11430-consolidado.pdf Spanish Employment and Social Security Legislation: https://www.boe.es/legislacion/codigos/codigo.php?id=93&modo=1&nota=0&tab=2 Ministry of Labour, Migration and Social Security, Strategic Plan of the Labour and Social Security Inspectorate: http://www.mitramiss.gob.es/itss/web/Documentos/ORGANISMO_ESTATAL/Doc_Organismo/Plan_Estrat_formato.pdf Eurostat, the salary gap in Spain: ec.europa.eu/newsroom/just/document.cfm?doc_id=48113 Pay gap: https://elpais.com/elpais/2018/03/06/media/1520349163_919876.html

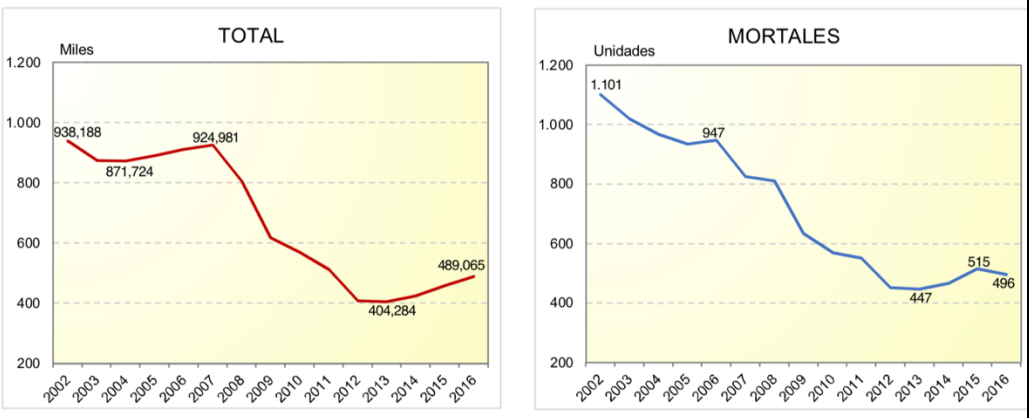
	Employment discrimination: https://politica.elpais.com/politica/2018/03/02/actualidad/1519999246_882483.html
Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
2.7.5	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is supplied using labour where the pay and employment conditions are fair and meet, or exceed, minimum requirements.
Finding	Labour rights are adequately protected in Spain, including those specified in the ILO's fundamental principles. Spain has ratified the ILO's eight Fundamental Conventions. In 2014, the International Trade Union Confederation (ITUC) published a report on working conditions in 139 countries, carrying out a study using 97 internationally-recognised indicators. Spain was given a score of 2 on a scale of 1 to 5 (where 1 is the highest score). A score of 2 means that there are repeated violations of rights, and that those violations can affect improvements in working conditions ("Certain rights have come under repeated attack by governments and / or companies and have undermined the struggle for better working conditions."). In Spain, the government holds consultations with the most representative trade-union organisations and business associations before setting the Salario Mínimo Interprofesional (Minimum Wage) for permanent, casual, and temporary workers alike, as well as for domestic employees, taking account of the Consumer Price Index, the average national productivity achieved, the increase in the share of work in national income, and the general economic situation. The value set for 2018 is 735.90 euros per month. Collective-bargaining agreements usually exist, with remuneration and conditions for the sector's workers. Employment conditions are set out in the Workers' Statute. There is a Government of Spain Plan to fight illegal working and Social Security fraud. Labour inspectors form the Government-appointed authority to check labour and safety rights. Companies are inspected in respect of those matters, with violations being sanctioned and corrected. Biosilva Agroforestal has put in place a system with the documentation that it requests from its subcontractors, i.e. those companies that carry out forestry work / forestry use under contract to Biosilva Agroforestal. In that system, subcontractors must provide Biosilva Agroforestal, for the purposes of verification, all documentation relating to the workers' employment conditions, including forms TC1 and TC2, which are evidence of payment of salaries and of being registered with the social-security system. According to the information available in respect of working conditions, Spain has a legal framework and authorities that ensure compliance with it. Accordingly, the risk relating to the indicator is classified as low.
Means of Verification	• Existing legal framework and level of governance • Contracts with suppliers • Records of field inspections and monitoring • Interviews with workers • Forms TC1 and TC2
Evidence Reviewed	ILO Spain: http://www.ilo.org/madrid/oit-en-españa/lang--es/index.htm ILO Conventions: http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--es/index.htm

	ITUC Global Rights Index: The world's worst countries for workers: http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf Spanish Constitution: https://www.boe.es/buscar/pdf/1978/BOE-A-1978-31229-consolidado.pdf Worker's Statute: https://www.boe.es/buscar/pdf/2015/BOE-A-2015-11430-consolidado.pdf Spanish Employment and Social Security Legislation: https://www.boe.es/legislacion/codigos/codigo.php?id=93&modo=1&nota=0&tab=2 Ministry of Labour, Migration and Social Security, Strategic Plan of the Labour and Social Security Inspectorate: http://www.mitramiss.gob.es/itss/web/Documentos/ORGANISMO_ESTATAL/Doc_Organismo/Plan_Estrat_formato.pdf Royal Decree 1077 / 2017 of 29 December setting the minimum wage for 2018: https://www.boe.es/boe/dias/2017/12/30/pdfs/BOE-A-2017-15848.pdf Ministry of Labour, Migration and Social Security, Employment Guide: http://www.mitramiss.gob.es/es/Guia/index.htm Biosilva Agroforestal, Documentación SyS Subcontratas
Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

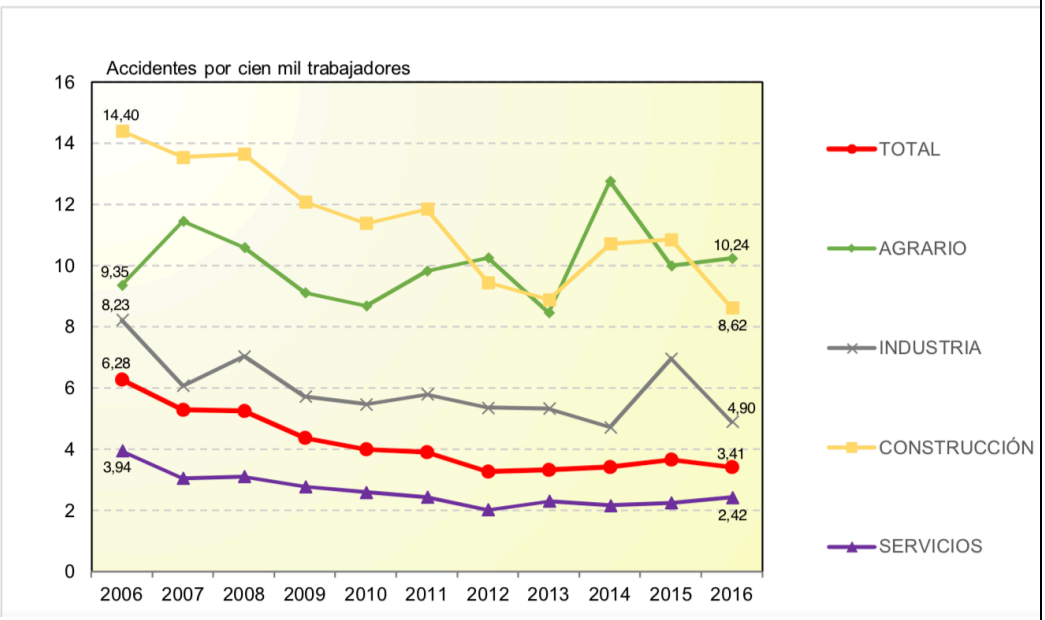
	Indicator
2.8.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12).
Finding	In Spain, Health and Safety at Work is extensively regulated by a range of legislation. That legislation covers all activities relating to the forestry sector, such as personal protection equipment, using machinery, etc. Risk assessment is a basic process for actively managing health and safety at work. The assessment procedure is needed to plan preventive action and to choose work teams, techniques, and work-organisation systems. Law 31 / 1995 of 8 November on Preventing Occupational Risks (BOE (Boletín Oficial del Estado - Spanish Government Gazette) of 10/11/1995) establishment Assessment of Occupational Risks as the instrument or "process aimed at estimating the size of risks that could not be avoided, which will provide the information needed for the businessperson to take the most suitable measures for planning prevention in the business". The businessperson will organise the resources needed for developing preventive action in accordance with the following methods: ○ taking personal charge of preventive activity; ○ appointing one or more workers to carry it out; ○ setting up an in-house prevention service; ○ setting up a joint prevention service; ○ using an external prevention service. Unless they are required by their size or by legislation to have an in-house prevention service, most businesses enter into a contract with an external prevention service that undertakes to carry out the occupational-risk assessment of the business, implement the measures needed to minimise them, and provide the business's workers with appropriate training. That is the case with Biosilva Agroforestal, which has a prevention-service contract with the firm Quirón Prevención, S.L.U. The following graph shows changes in statistics relating to accidents at work in Spain:

ACCIDENTES DE TRABAJO CON BAJA EN JORNADA
VALORES ABSOLUTOS
Evolución 2002 – 2016



A clear downward trend is observed in the total number of accidents at work, even with the sustained rise over the last four years. Moreover, during the whole of that period, the relationship between fatal accidents and the total number of accidents with sick absence remains close to one fatal accident for every 1,000 accidents with sick absence.
On a sectoral basis, in 2016, the construction sector showed the highest level of incidence, with 7,217.2 accidents with sick absence per 100,000 workers. Next comes the industrial sector, with 5,290.8, followed by the agricultural sector, with 5,143.4 accidents per 100,000 workers.
As regards the incidence of fatal accidents, the following graph shows the change over the period from 2006 to 2016 by sectors of activity. The construction and agricultural sectors show the highest levels of incidence for the entire period; in 2016, the agricultural sector reached an incidence level of 10.24 fatal accidents per working day per 100,000 workers, with the level for the construction sector being 8.62.

ÍNDICES DE INCIDENCIA POR SECTOR DE ACTIVIDAD
ACCIDENTES DE TRABAJO MORTALES EN JORNADA
Evolución 2006 – 2016



	In addition, it can be seen that the agricultural sector, which includes forestry, is the only one to show an increase in the incidence of fatal accidents since 2006. A more specific study of the forestry sector shows that 50% of forestry-related accidents occur in surveying work and when using chainsaws. In addition, the forestry and logging sector has one of the highest rates of accidents at work. Labour inspectors form the Government-appointed authority to check labour and safety rights. The logging sector is taken into consideration when scheduling work inspections and plans specific to the sector are in existence. Companies are inspected in respect of those matters, with violations being sanctioned and corrected. As has been stated, Biosilva Agroforestal has an external prevention service (Quirón Prevención, S.L.U.), so it has workstation-based risk assessment as well as a full set of safety documentation, which includes a description by type of work (surveying, loading, unloading, clearing, removal, processing, etc.) of the operational practices of the system for preventing occupational risks, and handing over personal protective equipment appropriately signed for by its workers. In turn, Biosilva Agroforestal has a system for collecting from its subcontractors and suppliers all the information needed to ensure compliance with current legislation in matters of Health and Safety at Work (certificate of medical fitness, certification of training and information in relation to Preventing Occupational Risks, certificate of issuing protective personal equipment, etc.). For work on public forests, the public administration appoints a Health and Safety Co-ordinator who ensures that all documentation is in order and that field work is carried out in compliance with legal requirements. Given that: ○ Spain has a clear legal framework and effective labour inspections, ○ Biosilva Agroforestal has implemented a system to ensure that it, its subcontractors, and its suppliers comply with legislation on Health and Safety at Work, and ○ Biosilva Agroforestal has instructions on operational practices of the System for Preventing Occupational Risks, and that specify the various tasks to be carried out in its forestry activity, the risk relating to this indicator is classified as: 3. low in respect of work done in public forests, and 4. specified in terms of work accidents in forest improvement/harvesting works carried out in private forests.
Means of Verification	• Existing legal framework and level of governance • Record of courses on preventing occupational risks and safety at work • Record of training carried out • Record of provision of personal protection equipment • Field inspections • Risk assessment • Interviews with staff
Evidence Reviewed	Law 31 / 1995 on Preventing Occupational Risks: https://www.boe.es/buscar/pdf/1995/BOE-A-1995-24292-consolidado.pdf Royal Decree 39 / 1997 approving the Prevention Services Regulation: https://www.boe.es/buscar/pdf/1997/BOE-A-1997-1853-consolidado.pdf Ministry of Labour, Migration and Social Security, Employment Guide, prevention of occupational risks: http://www.mitramiss.gob.es/es/Guia/texto/guia_10/index.htm Spanish Employment and Social Security Legislation: https://www.boe.es/legislacion/codigos/codigo.php?id=93&modo=1&nota=0&tab=2

	Ministry of Labour, Migration and Social Security, Accidents at Work Statistics, 2016: http://www.mitramiss.gob.es/estadisticas/eat/eat16/Resumen_resultados_ATR_2016.pdf Ministry of Labour, Migration and Social Security, Strategic Plan of the Labour and Social Security Inspectorate: http://www.mitramiss.gob.es/itss/web/Documentos/ORGANISMO_ESTATAL/Doc_Organismo/Plan_Estrat_formato.pdf Risk-Prevention in Forestry Work: http://www.insht.es/SectorAgrario/Contenidos/ficheros/PRL%20en%20actividad%20forestal.pdf ILO, Health and Safety in Forestry Work: http://www.ilo.org/wcmsp5/groups/public/---ed_protect/---protrav/---safework/documents/normativeinstrument/wcms_112615.pdf Ministry of Labour, Migration and Social Security, Work Inspections Integrated Plan 2016: http://www.mitramiss.gob.es/itss/ITSS/ITSS_Descargas/Atencion_ciudadano/Planificacion_actuaciones/actas-planes/PLAN_INTEGRADO_2016.pdf
Risk Rating	☐ **Low Risk** ☒ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	Biosilva Agroforestal has implemented a system that covers all the aspects to be taken into consideration to ensure compliance with legislation on Preventing Occupational Risks as well as on Health and Safety at Work. The system covers its own workers as well as its subcontractors and suppliers. 1. In all the works that are developed directly by Biosilva through its own personnel, the workers have the appropriate training and information for their position, they are given the right Personal Protection equipment for their job, and they pass the necessary checks for the medical certificate of fitness. 2. For the forestry harvesting works that are carried out by Biosilva through subcontractors, it is required that all personnel accessing the site are registered with the Social Security, and have the appropriate training and information for their position, and have been given the correct Personal Protection Equipment and they will also have had to pass the corresponding Medical Assessment. For the machinery, CE Marking or equivalent is required and if it is registered it must have the corresponding vehicle registration document and must pass the corresponding vehicle inspection test. 3. For companies that only supply material, written certification is required, stating that the harvesting carried out to produce the material was performed in compliance with the corresponding regulations on Occupational Health and Safety, both for workers and the machinery used. In addition, Biosilva Agroforestal has a Manual of Best Practices in Forestry that has been developed and implemented. The manual describes all types of forestry work, how to approach it, the necessary preventive safety measures, and action to be taken in case of accident or emergency. Biosilva Agroforestal certifies its workers' training in that respect. Subcontracted companies and suppliers must have a Manual of Best Practices in Forestry and certify its implementation or use Biosilva Agroforestal' manual. Biosilva Agroforestal also collects information on accidents at work that occur during work for which it and its suppliers are liable, analyses the causes, and takes the measures needed to avoid recurrence. The system includes the need for field inspections in the event of a systematic increase in accidents at work that occur during work covered by the scope of the certification. Finally, and in order to mitigate risk, Biosilva Agroforestal has designed an approval system for companies that work for the firm, in order to assess their performance in terms of Health and Safety in the forestry work that they carry out. The approval system consists of a system of visits by Biosilva Agroforestal staff (whether the head of forestry or individual area managers), with a checklist-based assessment of how work is being done and of the measures for avoiding accidents or impacts. A system is also set up to inform companies of non-compliance and to set a scale with an associated ranking, so that companies with the lowest scores will be inspected more frequently than companies with the best scores.

	The system that has been rolled out is considered complete and sufficient to ensure the use of safety measures and equipment during forestry work, and to mitigate risks relating to accidents at work.

	Indicator
2.9.1	Biomass is not sourced from areas that had high carbon stocks in January 2008 and no longer have those high carbon stocks.
Finding	According to data provided by Ministry for Ecological Transition (MITECO) in the 2018 Inventory of Greenhouse-Gas Emissions, with data covering the 1990-2016 series, forested lands and woodland management form the largest carbon sink, with values that have remained more or less stable since 1990. On an annual basis, they absorb about 39,000 Gg CO2-eq. That use is still an increase in the biomass and in Spain's remaining carbon stocks, and it forms the largest national sink.

Tabla RE.2.2.- Evolución de las absorciones netas en LULUCF

Valores absolutos (cifras en Gg CO_2-eq)

1990	1995	2000	2005	2007	2008	2009
-39.350	-36.544	-42.971	-41.371	-40.312	-39.813	-39.511

2010	2011	2012	2013	2014	2015	2016
-40.450	-38.902	-36.163	-38.562	-41.543	-42.007	-40.744

Índice de evolución anual (año 1990 = 100)

1990	1995	2000	2005	2007	2008	2009
100,0%	92,9%	109,2%	105,1%	102,5%	101,2%	100,4%

2010	2011	2012	2013	2014	2015	2016
102,8%	98,9%	91,9%	98,0%	105,6%	106,8%	103,6%

As shown in the following graph, 10,300 Gg CO_2-eq come from forestation and 28,500 Gg CO_2-eq from woodland management.

Tabla RE.2.4.- Emisiones (+) y absorciones (-) en las actividades LULUCF-KP (Gg CO_2-eq)

	1990	2008	2009	2010	2011	2012	2013	2014	2015	2016
A. Actividades artículo 3.3	**NA**	**-12.732**	**-12.661**	**-12.724**	**-12.365**	**-11.794**	**-12.077**	**-11.582**	**-10.678**	**-9.743**
A.1. Forestación/Reforestación	NA	-13.431	-13.357	-13.351	-12.991	-12.422	-12.646	-12.145	-11.239	-10.302
A.2. Deforestación	NA	699	697	627	627	628	569	563	561	559
B. Actividades artículo 3.4	**-870**	**-26.049**	**-25.978**	**-27.015**	**-25.958**	**-23.905**	**-26.166**	**-29.744**	**-31.223**	**-31.003**
B.1. Gestión bosques	NA	-29.091	-26.963	-27.158	-26.893	-26.370	-26.832	-27.957	-28.944	-28.557
B.2. Gestión tierras agrícolas	-870	3.042	986	143	935	2.464	666	-1.787	-2.279	-2.446
B.3. Gestión de pastizales	NA									
B.4. Revegetación	NA									
B.5. Drenaje y rehumectación de humedales	NA									

Hence, the data lead to the conclusion that there are two carbon sinks linked to forested lands:
reforestation, which has been carried out for decades in Spain, with the trend being downwards because the increase in forest area is stabilising with time;
forest management, which is carried out across the whole country and which, since 1990, has remained stable, with similar carbon-absorption values.
Conversely, studies indicate that in Spain, the amount of carbon stored in the soil is determined in large measure by climate and by vegetation type. Wetter areas in the north store more carbon the soil than drier areas in the south and east. On average, every m2 of soil has 8.7 kg of carbon trapped in it. That value can vary from 6.5 kg to 11.6 kg, depending on the area. Under the forested soil of Asturias, Galicia, Cantabria, and the

	Basque Country, in that order, lie Spain's highest stocks of carbon per m2 (they represent the fresher, wetter Atlantic areas). On the other hand, Murcia, Extremadura, and Andalusia are the communities that trap the least amount of carbon per m^2 in their forested soils (they represent the driest and hottest areas, with more typically Mediterranean vegetation). Taking all that into account, as well as the fact that the work done by Biosilva Agroforestal does not affect mature masses that may run the risk of disappearing because of inadequate management, the risk relating to this indicator is classified as low.
Means of Verification	• Existing legal framework • Information available: maps, web sites, statistics • Procedures and records relating to carbon storage • Interviews with experts
Evidence Reviewed	MITECO: • Carbon sinks: https://www.miteco.gob.es/es/cambio-climatico/temas/mecanismos-de-flexibilidad-y-sumideros/sumideros-de-carbono/ • Spanish emission-inventory system: https://www.miteco.gob.es/es/calidad-y-evaluacion-ambiental/temas/sistema-espanol-de-inventario-sei-/ • National Inventory of Greenhouse Gases (GHGs): https://www.miteco.gob.es/es/calidad-y-evaluacion-ambiental/temas/sistema-espanol-de-inventario-sei-/Inventario-GEI.aspx • 2018 Inventory of greenhouse-gas emissions_summary • 2018 Inventory of greenhouse-gas emissions Soil carbon stocks and their variability across the forests, shrublands, and grasslands of peninsular Spain: https://www.biogeosciences.net/10/8353/2013/bg-10-8353-2013.pdf
Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
2.9.2	Analysis demonstrates that feedstock harvesting does not diminish the capability of the forest to act as an effective sink or store of carbon over the long term.
Finding	According to the data given in indicator 2.9.1, Spanish forests maintain stability as carbon sinks linked to forestry management that was carried out in them during the entire period from 1990 to 2016. Accordingly, the risk relating to this indicator is classified as low.
Means of Verification	• Existing legal framework • Information available: maps, web sites, statistics • Results of analysis of carbon storage • Data from the historical series
Evidence Reviewed	MITECO: • Carbon sinks: https://www.miteco.gob.es/es/cambio-climatico/temas/mecanismos-de-flexibilidad-y-sumideros/sumideros-de-carbono/ • Spanish Emissions Inventory System: https://www.miteco.gob.es/es/calidad-y-evaluacion-ambiental/temas/sistema-espanol-de-inventario-sei-/ • National Inventory of Greenhouse Gases (GHGs): https://www.miteco.gob.es/es/calidad-y-evaluacion-ambiental/temas/sistema-espanol-de-inventario-sei-/Inventario-GEI.aspx

	• 2018 Inventory of greenhouse-gas emissions_summary • 2018 Inventory of greenhouse-gas emissions Soil carbon stocks and their variability across the forests, shrublands and grasslands of peninsular Spain: https://www.biogeosciences.net/10/8353/2013/bg-10-8353-2013.pdf
Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**

	Indicator
2.10.1	Genetically modified trees are not used.
Finding	There is no legal prohibition on using genetically-modified material, but there is a legal framework that regulates its use, for which it is necessary to obtain a government licence. There is the *Comisión Nacional de Bioseguridad* (National Commission on Biodiversity, Spain), which, "pursuant to the provisions of the second additional provision of Law 9 / 2003, is a collegiate body that is consultative in nature and of which the function is to inform on authorisation requests presented to the State General Administration and to the Autonomous Communities in respect of genetically-modified organisms (contained use, voluntary release, and marketing). It comes under the Spanish Ministry of Agriculture, Fisheries, Food, and the Environment, and it is made up of representatives of the various Ministries involved, representatives of the Autonomous Communities, as well as subject-matter expert persons and institutions." There is also a Public Register of Genetically-Modified Organisms that "is set up pursuant to Royal Decree 178 / 2004 of 30 January, which approves the General Regulation for the Implementation and Execution of Law 9 / 2003, in its first additional provision, pursuant to the third additional provision of the said law. It is enriched by such data as are available, by reason of their competence, to the Spanish Interministerial Council on Genetically-Modified Organisms, the National Commission on Biosecurity, the ministerial departments that are competent in the matter, and the competent bodies of the Autonomous Communities, as well as data arising from handling communications and authorisation requests for the contained use, voluntary release, and marketing of genetically-modified organisms." There are no records and there is no evidence of use of genetically-modified organisms in the forestry context. Based on the foregoing, the risk relating to this indicator is classified as low.
Means of Verification	Existing legal framework. Laws, regulations, and control bodies.
Evidence Reviewed	Legislation on Genetically-Modified Organisms (OGM): https://www.miteco.gob.es/es/calidad-y-evaluacion-ambiental/temas/biotecnologia/organismos-modificados-geneticamente-omg-/legislacion-general/ National Commission on Biosecurity: https://www.miteco.gob.es/es/calidad-y-evaluacion-ambiental/temas/biotecnologia/organismos-modificados-geneticamente-omg-/comision-naciona-bioseguridad/ Public Register of GMOs: https://www.miteco.gob.es/es/calidad-y-evaluacion-ambiental/temas/biotecnologia/organismos-modificados-geneticamente-omg-/registro-publico-OMG/
Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**