

SBP Regional Risk Assessment for Portugal

Final draft for public consultation



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Document history

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Abbreviations

ACT – Portuguese Work Conditions Authority

ASAE – National Authority for the Food and Economic Safety

CBD – Convention on Biological Diversity

CITES – Convention on International Trade in Endangered Species of Wild Fauna and Flora

CT 145 – Technical Committee 145 (Sustainable Forest Management)

DGT – General Directorate of Territory

DDS – Due Diligence System

EUTR – European Union Timber Regulation

FAO – Food and Agriculture Organisation

FSC – Forest Stewardship Council

FSC NRA – FSC National Risk Assessment

GNR – National Guard

HCV – High Conservation Values

ICNF – Portuguese Institute for the Conservation of Nature and Forest

IFN – Portuguese Forest Inventory

ILO – International Labour Organisation

IMI – Real Estate Municipal Tax

INE – Statistics National Institute

IPQ – Portuguese Institute for Standardisation

IRS – Tax over individual revenues

IRC – Tax over company's revenues

IVA – Portuguese Value Added Tax (VAT)

IRN – Portuguese Institute of Registry and Notary

NGO – Non-Governmental Organisation

NMP – Pinewood Wilt Disease

NTPP – Non-Timber Forest Products

PDM – Municipality Director Plan

PEFC – Programme for the Endorsement of Forest Certification

PGF – Forest Management Plan

PROF – Regional Forest Plan

RJAAR – Legal Regime for afforestation and reforestation activities

SEPNA – Department of National Guard responsible for environment surveillance

ZIF – Forest Intervention Zones

Foreword

Regional Risk Assessments (RRAs) are a key part of the Sustainable Biomass Program's (SBP's) focus on identifying and mitigating risks associated with sustainably sourcing feedstock for biomass pellet and wood chip production. The SBP Framework is designed to provide assurance that feedstock is sourced legally and sustainably.

Feedstock certified at the forest level through Forest Stewardship Council® (FSC®) or Programme for the Endorsement of Forest Certification (PEFC) schemes and feedstock from recycled sources is considered SBP-compliant. All other feedstock must be evaluated using a risk-based approach if it is to count towards a SBP-compliant claim.

The Biomass Producer – a pellet mill or woodchip producer – is typically responsible for carrying out the risk assessment and putting in place mitigation measures to manage any specified risks such that the risks can be considered as being controlled and hence low risk. It is the role of an independent, third-party Certification Body (CB), approved by SBP, to check that the feedstock evaluation has been correctly undertaken and that any mitigation measures are being effectively implemented.

The purpose of a RRA is to evaluate an entire geographic region and determine the risks associated with sourcing feedstock for biomass pellet or wood chip production from that region. Thus, the need for individual Biomass Producers to conduct risk assessments is avoided and, therefore, consistency between Biomass Producers' risk assessments guaranteed. The SBP RRA procedure also ensures active engagement with a diverse range of stakeholders in the region.

The SBP RRA Procedure specifies the requirements and processes that must be followed to develop and endorse SBP risk assessments of regions or countries.

A 'sponsoring body' is responsible for overseeing the development and financing of an RRA. The sponsoring body might be a party (or parties) working singly or on a collaborative basis, for example, a company or an organisation or a group of companies or stakeholders in partnership. The sponsoring body need not be a legally constituted organisation. The sponsoring body appoints a 'working body' (WB) to conduct the RRA.

Prior to appointment, SBP reviews and confirms that a proposed WB:

- a) has sufficient, suitably-qualified staff to perform the risk assessment;
- b) has demonstrated competence with the SBP standards; and
- c) has relevant knowledge of the language, laws and customs of the region(s) in which they will operate.

1 Introduction

This document is the final draft of the Regional Risk Assessment (RRA) for Portugal prepared at the request of ANPEB (Portuguese Pellet Association), the sponsoring body responsible for appointing a working body to conduct the RRA in accordance with SBP Regional Risk Assessment Procedure v1.0.

The risk assessment work was facilitated by a working group (the 'working body') of members of the Portuguese Standardisation Institute (IPQ) Technical Committee 145. The CT 145 is a technical body whose aim is the prepare normative documents and opinions in the field of forest management, where individual or collective stakeholders with an interest in the matters concerned participate in a voluntary regime, giving, as far as possible, a balanced representation of the socio-economic and environmental interests in the scope.

The main objective of CT 145 is to prepare, follow up and review Portuguese forest management standards, including the principles, criteria and indicators established by recognised international forest certification schemes, which, considering the specificity of the Portuguese forest, allow achieving the certification.

The working group "SBP National Risk Assessment" (*sic*) was created in the plenary assembly number 92 of the Technical Committee 145 that took place on 31 May 2017. The entities taking part in the working group "SBP National Risk Assessment" (*sic*) are as follows:

PEFC Portugal (Marina Soares e Paula Salazar)
ANEFA (Vera Santos)
Navigator Company (Paula Guimarães and Inês Viegas)
Altri florestal (Pedro Serafim)
Susana Brígido (2bforest)
INIAV (Alberto Gomes)
Centro Pinus (Susana Carneiro)
ICNF (Helena Ceia and Dina Anastácio)
ANPEB (João Ferreira)

The coordination of the working group was performed by ANPEB, which was responsible for reviewing and editing the text.

The members of Technical Committee 145 involved in the process are found [here](#).

The working group took into account, when applicable, the work performed by the Technical Committee 145 "Working Group for FSC Controlled Wood National Assessment" that led to the submission of the Draft National Risk Assessment document proposal for appreciation of FSC International.

Comments were received from an external consultant via SBP on 24 August 2017. Amendments were performed taking into account the comments received and version 6.0 of the draft RRA was sent to SBP on 30 August 2017 and was approved to be released to public consultation on 5 September.

The public consultation was carried out from 5 September to 5 October and included close to 200 entities, comprising national authorities, research institutes, universities, forest owners' associations, certification bodies, environmental NGO's, forest based industries among others.

2 Scope and Regional Background

The scope of this assessment covers the entire territory mainland Portugal, which includes the Primary feedstock supplies from Portugal.

By-products from first transformation of wood are sources of secondary feedstock and these are not included on this Regional Risk Assessment, since the origin of the material cannot be reliably documented.

Portuguese forest occupies around 35.4% (3,154,800 hectares) of the territory, although forest stands represent about 2,942,800 hectares.

In Portugal, around 97% of forest land is private (including individuals, communities, cooperatives and companies). The remaining 3% is public (State).

Forest areas integrated in the National System of Conservation Areas represent 18.7% of the Portuguese mainland forest (IFN6).

National forests and forest perimeters, under ICNF represent 5.8% of the forest.

(Coelho, Inocência) identifies typical distribution of the Forest private property on several regions of the Portuguese mainland:

Trás-os-Montes, Douro e Minho regions show a property average size of 1.9ha/owner, being 63% of properties with less than 10ha.

Beira Interior and Beira Litoral, in the central region of Portuguese mainland show a property average size of 1.46ha/owner and properties under 10ha representing 62% of the forest area.

Ribatejo and West – 7.53ha/owner average and 55.6% of the forest properties above 100ha.

Alentejo – 22.6ha/owner average and 68.8% of the forest properties above 100ha.

Algarve – 2.83ha/owner and 59% of properties with less than 10ha

Portuguese forest is mostly defined by the intervention of men. There was a significant increase of forest cover from 7% in 1870 to 35% at the present. Hence, the majority of the present forest cover have developed from afforestation activities of Pinus Pinaster and Eucalyptus Globulus. Thereby, forest areas considered as primary forest, as is published by FAO, account for around 0.8% of overall forest cover.

Furthermore, the overall dynamics of the Portuguese forest cover is not promoted or supported by the demand of biomass. Simultaneously, the development of forest energy crops is not permitted in Portugal, through several legislation limitations, namely the mandatory previous authorisation for premature final cut of eucalyptus and pinus pinaster stands, regulations for the introduction and environmental control of non-indigenous species and mainly the mandatory previous authorization for afforestation and reforestation activities using short rotation crops.

Forest operations occurs both for timber production and extraction of non-timber forest products (NTFPs) such as cork and pine cones, being Portugal, the leading global producer of cork, accounting for almost 50% of global cork production.

There is a legal framework for protection and conservation of *Quercus suber* and *Quercus ilex*.

Forest Management Plans (PGF) are mandatory¹ for forest areas above a minimum area defined on [PROF](#) as well as in Forest Intervention Areas (ZIF, 940,432 ha²). In 2016, there were 1,680,000 ha under PGF³ from which 450,034 ha overlap the National Classified Areas Network.

Felling licences are mandatory for the following cases:

- i) Protected species (such as Cork Oak [*Quercus suber*], Holm Oak [*Quercus ilex*] and Holly [*Ilex aquifolium*]);
- ii) Premature cutting of *Pinus pinaster* and Eucalyptus;
- iii) Protected, classified, natural monument, and riparian areas;
- iv) Phytosanitary cutting related to Pine Disease (manifest).

A felling manifest is required for commercial felling (including all thinning) of all tree species for industrial purposes, with a 30-day deadline after the operation is concluded. The national forest and conservation authority is the Institute of Conservation of Nature and Forests (ICNF) with competencies over all forest, hunting and nature conservation matters.

ICNF also manages public forest areas, being also involved in the management of community areas. In addition, the Environmental Service of National Republican Guard (SEPNA/ GNR) is engaged in the inspection of environmental issues and natural resources in all private and public areas.

The country is considered homogenous with regard to SBP risks, therefore, no further sub-division is needed. Where differences in regards to forest ownership are identified it is explicitly mentioned under the finding of each indicator.

¹ Article number 13, [Decreto-Lei n.º 16/2009](#)

² <http://www.icnf.pt/portal/florestas/gf/zif/sit-ger-inf>

³ "Uma Visão para o Sector Florestal, AIFF <http://www.aiff.pt/assets/Visao-para-o-sector-florestal.pdf>

3 Methodology

The proposed draft SBP risk assessment includes all relevant criteria and indicators of SBP Standard 1: Feedstock Compliance Standard. The project team included ANPEB and the Working Group SBP NRA as well as the members of Technical Committee 145. Several elements of the team were involved in the development of the FSC Controlled Wood NRA Draft already available at [FSC webpage](#) and their experience was very important for the development of this document.

It is important to highlight that Technical Committee 145 comprises a high level of representativeness of the major relevant stakeholders with 59 registered members and the sectorial distribution presented in the table below. All members were constantly updated on the developments of the work performed by the Working Group.

Table 1 Stakeholders groups within CT145

Industry and trade	Small and Medium Companies	Administration	Work authorities and unions	Universities and technology centres	Certification Bodies	Environmental NGO
35.59%	10.17%	11.86%	1.69%	11.86%	25.42%	3.39%

The indicators and criteria related to the forest management practices and environmental protection measures were analysed, taking into account the primary feedstock producers in Portugal as they have a direct impact on these criteria. The primary feedstock suppliers in Portugal are state forest, private forest owners, organizations of forest owners and company owned private forests.

The work performed by the Working Group SBP NRA comprised the following steps:

- 1) The working group SBP NRA was officially constituted in the CT 145 general assembly on 31 May 2017. The kickstart meeting for the project of the working group was held using webconference on 9 June 2017. Susana Brigído, Alberto Gomes and Helena Ceia couldn't join the meeting. ANPEB, as coordinator presented the Working Group, a first draft of the SBP NRA (V1.0), consisting on findings that were previously collected, providing a starting basis for the the development of the work. The members of the working group agreed on study and comment the SBP NRA V1.0 for a period of 4 weeks and schedule a presential meeting for the beginning of July in order to discuss amendments and changes as well as risk evaluations for the relevant indicators.
- 2) The first meeting of the working group SBP NRA was scheduled for 13 July 2017. The meeting was open for members of CT 145 outside the working group, as well as other relevant stakeholders identified by ICNF. Before the meeting, a new version of the SBP Regional Risk Assessment draft (V2.0), comprising amendments suggested by the working group, was sent to all the envited stakeholders. During this meeting, several changes were proposed by the participants and accepted by the working group. Another presential meeting was schedule for 28 July with the objective of presenting a new version of the draft, considering the changes accepted by the working group.
- 3) A revised version of the draft SBP Regional Risk Assessment (V4.0) from 25 July 2017 was sent attached to the invitation for the second presential meeting to be held on 28 July. The importance of the participation of all CT145 members was reinforced in the invitation for this meeting. At the same time, considering the importance of the environmental NGO participation within this project, the invitation was extended to Quercus, Associação Zero, WWF and Liga para a Protecção da Natureza. Unfortunately, none of the organizations was represented. The outcomes of the second presential meeting gave origin to the version 5.2. of the SBP NRA draft.

- 4) The SBP Regional Risk Assessment draft V5.2 was put to the vote of all CT 145 members through an email sent on 16 August 2017 by the CT145 secretariat. A 10 working days voting period was given to all members. The SBP Regional Risk Assessment draft V5.2 was accepted with one abstention.
- 5) SBP Regional Risk Assessment draft V5.2 was submitted to SBP technical office on 14 August.
- 6) Comments were received from an external consultant of SBP on 24 August. Amendments were performed taking into account the comments received and the version 6.0 of the draft SBP Regional Risk Assessment was sent to SBP on 30 August, being approved to be released to public consultation on 5 September.

The stakeholder consultation process lasted 30 days and started on 5 September 2017. A brief description of the process is presented in chapter 5.

4 Stakeholder’s consultation

The stakeholder consultation was carried out from 5 September 2017 to 5 October 2017. During the process, SBP received and verified the list of stakeholders, comprising around 200 entities. The identified stakeholders are distributed by six main groups as shown in Table 2. The full list of stakeholders can be consulted on Annex 3 of this document. The stakeholders that attended the Working Group meetings within CT145 framework are also identified in Annex 3. The written comments received within the public consultation framework can be consulted on the Annex 2 of this document.

Table 2 Range of entities directly contacted within the stakeholders’ consultation

State forest services or equivalent	Forest and environmental NGO	Forest based industries and association	Universities and technology centres	Certification Bodies and working groups developing standards	Energy Agencies
15,79%	8,42%	36,84%	22,11%	5,26%	4,21%

The stakeholders were contacted by email sent directly from CT 145 secretariat on 5 September 2017. The stakeholders consultation was promoted on ANPEB website (see [here](#)) and CT145 page on ICNF website (see [here](#)). ANPEB also promoted the consultation using the association’s facebook page ([here](#)) and twitter ([here](#)).

Written comments were received by NEPcon, as a Certification Body and key player on the SBP framework since the establishment of the scheme. The comments and proposals can be consulted in the Annex 2 of the document.

Due to the considerable number of revisions done by the working group, considering comments from CT145 members that attended the meetings, as well as SBP external consultant (see Annex 2), sent before the stakeholder’s consultation period, the version 6 of the draft RRA that went to public consultation had been significantly scrutinised by several key actors. A reduced number of comments coming from the public consultation was expected for this reason.

The rationale that supports the risk evaluation proposed for the indicators subject to comments are presented below:

Indicator 1.1.2: Feedstock can be traced back to the defined Supply Base

It was considered that despite the fact that Portugal has legislation in order to trace back the feedstock (described in RRA), it is verified a lack of application of the felling manifest in RRA, since there is not a proper verification by ICNF in order to demand that all forest producers deliver the it, as mandatory. The common understanding among stakeholders is that right now there is a low percentage of forest producer that are delivering the harvesting manifest, leading to a failure in the application of this legal requirement. That situation has particular importance for this indicator since it is the harvesting manifest the document that has the geographical information about the harvested area. This provision plays a major importance for raw material originating on hardwood, that is not under the rules of the Nematode manifest. A precautionary approach lead to the establishment of specified risk for this indicator.

Indicator 1.2.1: The legality of ownership and land use can be demonstrated for the Supply Base

Portugal has an incomplete geometric cadastre of the rural real estate that only covers 53% of the country, which was addressed in the version 5.2 of the RRA. Stakeholders raised the attention for the risk verified in areas where the geometric cadastre is not developed. The impact of the identified risk was considered, by the understanding of the working group as residual. It was considered that the number of lawsuits related to the illegal use of forest property by entities who don't have legal ownership over that land is negligible. Nevertheless, taking a precautionary approach and minding that the government is taking measures in order to simplify and streamline the process of register the other 47% of the rural real estate, it was decided to raise the risk level to specified for the above mentioned areas.

Indicator 1.4.1: Payments for harvest rights and timber, including duties, relevant royalties and taxes related to timber harvesting, are complete and up to date

SBP external consultant and NEPcon considered that the business between the industry and the logger is well defined and there is no risk in this part of the chain, but the business between the forest producer and the logger has some risk related to tax evasion. It was considered that the legal mechanisms in place are suitable for preventing tax evasion. At the same, surveillance actions over transported wood products are constant. Data requested to SEPNA (Department of the National Guard responsible for nature related activities) showed, for 2016, 26 registered infractions related to wood circulating without purchase invoice or delivery documents, which was considered residual. The final decision was to keep low risk for this indicator.

Indicators 2.1.1 and 2.1.2: Forests and other areas with high conservation values are identified and mapped and Threats to forests and other areas with high conservation values from forest management activities are identified and addressed

NEPcon asked for clearer justification for the specified risk assessment regarding the identification, mapping and addressing of threats on HCV1 and HCV 3, considering that the wording in the document didn't follow the risk classification. The working group considered that, the scope of SNAC and RNAP, is the assessment of large areas with significant biodiversity values, meaning that the identification of threats and pressures to conservation attributes, as well as monitoring activities are, performed at a large scale. Hence, the information and mapping available at the level of a large area, such as, a Classified Area may not be sufficiently detailed to ensure sufficient identification of HCV attributes at the level of the Supply Base (smaller area) The identification of precise HCV attributes at supply base level might not be completely included within the assessments of Protected and Classified Areas, thereby, justifying the specified risk. The habitats and species vulnerable to forestry operations are identified within the scope of Reed Natura2000 and Habitats and Birds Directive reports. The decision is to keep specified risk for HCV1 and HCV3 attributes and low risk for the remain HCV. The mitigation measures shall be defined by each company, therefore, no following was given on the proposal to require an Environmental Impact Assessment for every raw material entry.

Indicator 2.1.3: Feedstock is not sourced from forests converted to production plantation forest or non-forest lands after January 2008

Stakeholders agreed there is a strong law framework regarding the reforestation activities with change in dominant species, strengthened by the [review of the RJAAR for the beginning of 2018](#), imposing a restraint to the expansion of eucalyptus area in the Portuguese forest. Concerns were raised on the existence of illegal plantations of eucalyptus occurring in Portugal, nevertheless, no data was presented on this matter, so this claim was not followed. At this point, the working group considers that the future conversions of forests to plantations will be very limited to non-existing due to the tighter law framework revision. Hence, the risk of raw material coming from areas that will be converted to plantations is low. Regarding raw material (mainly eucalyptus) coming from conversions done after 2008 until 2017, the risk is changed to specified since the law allowed this actions, if approved by ICNF.

Indicator 2.2.2: Feedstock is sourced from forests where management maintains or improves soil quality

Concerns were raised on the existence of illegal plantations of eucalyptus occurring in Portugal, nevertheless, no data was presented on this matter, so this claim was not followed. It is considered that all the elements exposed in the findings show a positive trend of the soil quality and improvement verification measures from the authorities, therefore, the decision was to keep low risk for this indicator.

Indicator 2.2.5: The process of residue removal minimises harm to ecosystems

Concerns were raised on the lack of compliance from forest operators with the mandatory filling and delivering of the sanitary manifest for pine nematode. From the findings on indicator 1.1.2: "In 2016, SEPNA inspected 24,535 vehicles carrying wood logs and pallets and identified 424 infractions (1.7%) from which 295 refer to the lack of NMP manifest (1,2%) [[Activity Report 2016](#)]." It is considered that this rate of infractions is not sufficient to raise the risk evaluation to specified. Low risk is considered for this indicator.

Indicator 2.2.6: Negative impacts on ground water, surface water and water downstream from forest management are minimised

Concerns were raised over the extension of clear cuts for which a maximum threshold is not defined for every region of the country, hence potentially presenting a specified risk on the degradation of water resources. For interventions on areas above 50 ha, an Environmental Impact Assessment is mandatory. If the area is identified as specifically sensible, the threshold drops to 10 ha. At the same time, a Forest Management Plan is mandatory for properties above the area defined in the applicable Forest Regional Plan (PROF). The Forest Regional Plans are under revision, at this point, and the applicable minimum property threshold should be decreased, hence covering more properties than nowadays.

The size distribution of the forest property is also a very important factor in this assessment. The average property size is very small and the percentage of properties under 10ha, represents more than 50% of the properties in every region except Alentejo. The probability of a clear-cuts to occur over a large area within this scenario is residual.

It is considered that there are no strong reasons to change the risk evaluation on this indicator.

Indicator 2.5.1: Legal, customary and traditional tenure and use rights of indigenous people and local communities related to the forest are identified, documented and respected

Customary rights consist, as stated in the indicator description, as habitual, repeated and “normal” activities. This has to do with access to water sources established for a long time as practice, passage through private property that is used traditionally by a certain community. Customary rights don’t consist on in the collection of mushrooms, plants or pine cones in a property belonging to a third party, unless this practice is perceived and seen by the community, as a traditional practice. The owner as the right over its own property. The collection of mushrooms, for instance, without the authorization of the owner can be considered as trespassing. At the same time, the collection of wild mushrooms for economical purposes must be preceded by a registry of the operator and authorization by ICNF. The risk evaluation for this indicator is kept low.

5 Conclusions

Based on the information available during the risk assessment process, the level of risk for each of the criteria was chosen. Below is the summary of the indicator for which specified risk was identified. For some indicators, specified risk was not defined for the entire country, subject to the risk assessment. These cases are clearly identified in the detailed findings of the respective indicators.

Indicator	Specified Risk	Low Risk	Remarks
1.1.1		X	
1.1.2	X		
1.1.3		X	
1.2.1	X		Specified risk for areas without Geometric Cadastre of the Real Estate Property.
		X	Low risk on other areas.
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		Areas with dimensions below the minimum threshold for mandatory Forest Management Plan (refer to PROF) and outside SNAC.
	X		Areas where PGF is mandatory or within SNAC.
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	
2.3.1		X	
2.3.2	X		
2.3.3		X	
2.4.1			

2.4.2	X		Specified risk regarding the management and prevention of fire occurrences.
		X	Low risk on the management of pests and diseases.
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	

Annex 1: Detailed findings for Supply Base Evaluation indicators

	Indicator
1.1.1	The Supply Base is defined and mapped.
Finding	<p>This SBP Regional Risk Assessment covers feedstock coming from material with origin in Mainland Portugal.</p> <p>In Mainland Portugal, private property from private owners (89%) and community (Baldios, 8%) correspond to 3,060 million hectares of forests (97% of total forest land), including 5.7% property of industry companies. Public areas are up to 3% (around 94,000 ha). Directorate-General for Territory (DGT) provides, in its webpage, maps with cartographic information for scales up to 1:50 000.(here)</p> <p>Within the framework of the territorial planning instrument at municipal level, the Municipal Director Plan, several plants are provided at appropriate scale. (example here)</p> <p>The Geographic institute of the Army has the cartographic survey of the Portuguese Territory at a scale of 1:25 000.</p> <p>Regarding species, the most relevant in terms of pellets production are Pinus pinaster (Maritime pine/Pinheiro bravo) 23% of forest surface 714,000 ha, Eucalyptus spp. (Eucalyptus/Eucalipto) 26% of forest surface 812,000 ha and Pinus pinea (Stone pine/Pinheiro manso) 6% of forest surface 175,000 ha. [IFN6] It is important to highlight that Pinus Pinea is mainly used for the production of Pine nut and mostly the thinning and pruning by-products are used for pellet production. Pinus pinaster and Eucalyptus spp. are spread all around the country. Pinus pinea is more abundant in the South. All other species present in Mainland Portugal: Quercus suber (Cork oak/Sobreiro), Quercus ilex (Holm oak/Azinheira), Quercus spp. (Oaks/Carvalhos), Castanea sativa (Chestnut/Castanheiro), Fraxinus spp. (Ash/Freixo), Alnus glutinosa (Alder/Amieiro), are not commonly used for economical appliances.</p> <p>Despite the incomplete geometric cadastre of the rural real estate, maps are available, from several sources at an appropriate scale to define geographically the origin of the supply base. The information available from delivery notes, felling manifests, invoices, among other legal documents, which contain the origin of the raw material (County, village) serves as definition of the source which enables, supported on maps available, the mapping of the supply base.</p>
Means of Verification	<ul style="list-style-type: none"> • The Scope is defined and justified; • Maps to the appropriate scale are available; • Key personnel demonstrate an understanding of the supply base
Evidence Reviewed	<p>Estratégia Nacional das Florestas (RCM n.º 6-B/2015 - Diário da República n.º24/2015, 1º Suplemento, Série I de 2015-02-04); ICNF portal(http://www.icnf.pt/portal/icnf/docref/enf)</p> <p>Inventario Florestal Nacional IFN5 (FloreStat_IFN5); ICNF portal (http://www.icnf.pt/portal/florestas/ifn/ifn5/rel-fin)</p>

	<p>Inventario Florestal Nacional IFN6, preliminary results (IFN6 – Resultados preliminares.pdf); ICNF portal (http://www.icnf.pt/portal/florestas/ifn/ifn6)</p> <p>Estatísticas Agrícolas 2015.xls, Instituto Nacional Estatística (https://www.ine.pt/xportal/xmain?xpid=INE&xpgid=ine_publicacoes&PUBLICACOESpub_boui=271434407&PUBLICACOESmodo=2)</p> <p>Decreto Law 16-2009 planos gestão florestal (https://dre.pt/application/dir/pdf1sdip/2009/01/00900/0026800273.pdf); ICNF portal (http://www.icnf.pt/portal/icnf/legisl/legislacao/2009/Decree-law-n.o-16-2009-de-14-de-janeiro.-d.r.-n.o-9-serie-i)</p> <p>Normas Técnicas Planos Gestão Florestal (http://www.icnf.pt/portal/florestas/gf/pgf/resource/doc/manual/normas-tecn-PGFAFN.pdf)</p> <p>Direção Geral do Território, http://www.dgterritorio.pt/</p> <p>Centro de Informação Geoespacial do Exército, https://www.igeoe.pt/index.php?id=1</p>
Risk Rating	<p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>

	Indicator
1.1.2	Feedstock can be traced back to the defined Supply Base.
Finding	<p>Information obtained from Centro Pinus (non-profit association for key players of Pine based industry), INE and others shows that pine wood consumption of timber industry in 2014 was 4,360,000 m3 (1,300,000 m3 saw mill industry, 30%; 300,000 m3 biomass, 7% and 1,400,000 m3 pellets, 32% and 1.360.000 other uses not relevant for pellets industry). However, in 2014 there was available only 2,247,000 m3 of pine wood from Mainland Portugal (Pinus pinaster). As an obvious conclusion a lot of imported pine comes into Portuguese timber industry in 2014, mostly from Spain.</p> <p>Similar situation occurs for Eucalyptus in pulp and paper industry, which low quality parts may be also used in biomass industry. Information from Annual Bulletin of CELPA (Paper Industry Association) states that in 2014 it was imported 45% of total eucalyptus wood procured by paper industry (2,415,000 m3 imported), in its vast majority round wood from Spain and at minor extent, chips from South America or Africa (usually FSC/PEFC certified or controlled).</p> <p>Based on the fact that relevant volumes of imported material come into Portugal annually it is noted that imported material it is not covered by this RRA.</p> <p>A felling manifest is obligatory for all common commercial harvesting activities and shall be submitted to forest authorities (ICNF) up to 30 days after the felling operation.</p> <p>A National Action Plan for Control of Pinus Wilt Disease/Nemátodo-da-madeira-do-pinheiro (NMP) (Bursaphelenchus xylophilus) and its vector insect Monochamus galloprovincialis is in place and there is an obligation of previous communication of any felling and/or transportation of wood affected by this disease. The document (phytosanitary manifest) must accompany material until the arrival to industrial processing facilities. This is mostly focused on Pinus pinaster (23% of forest area) main source for BP.</p>

The felling manifest, as well as the NMP manifest contain the following information:

- Operator or service provider information
- Localization of the feedstock until the freguesia (small village) level
- Quantities harvested
- Others

Simultaneously, approval documentation is required for specific operations on cork and holm Oak including cutting and pruning, Holly cutting, and also premature cuttings of Eucalyptus, Pinus pinaster or riparian vegetation.

Since 2013 and the introduction of the EUTR laws, operators are required to register their activities on a Digital Platform managed by forest authorities (ICNF).

Inspections from government are in place and operators must apply DDS to justify legality of timber. Regarding transportation, legal requirements include having the right and valid invoice or transport documentation are in place:

- Regular invoice for trading operation or transport documentation or waybill, or devolution note;
- CRM on international transportation
- In the case of pine or conifers timber the transporter must have an Economic Operator Registry and a phytosanitary Manifest for each feeling (if one feeling is transported several times it is mandatory to copy the manifest for all the transportations). The issuance of required transport and sales documents is well understood and regulations are largely adhered to. Inspections are common at Portuguese roads and enforcement of regulations is considered adequate.

Felling phytosanitary manifest (NMP manifest) includes identification of the origin of the felling. Also documentation for transportation identifies the origin of the transport which could be useful in case of direct transport to BP facilities and in any case is useful in the traceability of material. Both are the most common ways to trace back to origin even if the origin area is not the forest land itself but the freguesia (minimum administrative division) where forest land is included. Several public authorities, such as SEPNA (Department of National Guard responsible for environment surveillance), ASAE (National Authority for the Food and Economic Safety) and ICNF, organize regular surveillance activities to verify the compliance of forest operators and wood transportation companies with the dispositions of the National Action Plan for Control of Pinus Wilt Disease. In 2016, SEPNA inspected 24,535 vehicles carrying wood logs and pallets and identified 424 infractions (1,7%) from which 295 refer to the lack of NMP manifest (1,2%) [[Activity Report 2016](#)].

There are systems in place to trace the feedstock primary origin back to the forest stand but it is possible to do so if there are elements in the manifests or transportation documents, which could be used in the cadastral system (as the article number and section) or geographic coordinates in areas without cadastral system.

As evidenced by the low Corruption Perception Index of Portugal (63) and the high level of law enforcement documents such as invoices and transport documents are considered reliable sources of information.

On the above background, the risk related to the traceability of feedstock back to the supply base is evaluated to be specified due to the lack of compliance of forest operators in delivering all the mandatory documents for every type of raw material delivered, specially, the felling manifest for species other than coniferous. The felling manifest plays an important role for

	<p>hardwood raw material. In the case of coniferous raw material, the implementation of the phytosanitary felling manifest is widely spread and verified regularly by SEPNA and ASAE. Procedures to ensure the delivery of all mandatory documents shall be put in place.</p>
<p>Means of Verification</p>	<ul style="list-style-type: none"> - Copy of phytosanitary manifests (felling and/or transportation) for all conifers with geographic elements (cadastral and/or coordinates); - Copy of delivered felling manifest to Forest Authorities (ICNF) for all commercial harvestings with geographic elements (cadastral and/or coordinates). - Invoices, waybills, transport/shipping documents - The existence of a strong legal framework in the region - Feedstock inputs, including species and volumes, are consistent with the defined Supply Base; - Transport documentation and goods-in records are consistent with the defined scope of the SBE.
<p>Evidence Reviewed</p>	<p>Estratégia Nacional das Florestas (RCM n.º 6-B/2015 - Diário da República n.º24/2015, 1º Suplemento, Série I de 2015-02-04); ICNF portal (http://www.icnf.pt/portal/icnf/docref/enf) Estatísticas Agrícolas 2015.xls, Instituto Nacional Estatística (https://www.ine.pt/xportal/xmain?xpid=INE&xpgid=ine_publicacoes&PUBLICACOESpub_boui=271434407&PUBLICACOESmodo=2)</p> <p>Boletim-Estatístico-da-Celpa-de-2014 (http://www.celpa.pt/wpcontent/uploads/2016/09/Boletim_WEB_2015.pdf)</p> <p>Relatório-de-Characterização-da-Fileira-Florestal-2014 (http://www.aiff.org.pt/assets/Relatorio-de-Characterizacao-da-FiLawra-Florestal-2014-160p-CAPA-3-spread....pdf) Cutting Permission in Law n.º 33/96, at 17/08 (article 7th) https://dre.pt/application/dir/pdf1sdip/1996/08/190A00/25682573.pdf</p> <p>Fileira do Pinho: desafios e oportunidades (centroPINUS_JoaoGonçalves dados fiLawra pinho 2014.pdf); Centro Pinus (http://www.centropinus.org/index.php?lingua=1)</p> <p>Decreto Law 123-2015 nemátodo do Pinheiro (https://dre.pt/application/file/67649256); ICNF portal (http://www.icnf.pt/portal/florestas/prag-doe/ag-bn/nmp)</p> <p>Declaração Retificação n.º 38/2015 de 01/09 do Decreto Law 123-2015 nematodo do Pinheiro (https://dre.pt/application/file/70144398)</p> <p>Decreto Law 174-1988 manifesto corte (https://dre.pt/application/file/374768); ICNF portal(http://www.icnf.pt/portal/icnf/serv/formularios/manif/man-cort-arr-arvor)</p> <p>Decreto Law 169-2001 Sobreiras e azinheiras (Decreto Law 169-2001 Sobreiras e azinheiras.pdf); ICNF portal (http://www.icnf.pt/portal/icnf/serv/formularios/sobrazinh)</p> <p>Registo de Operador de Madeira e Derivados ICNF portal (http://www.icnf.pt/portal/florestas/fiLawras/reg-op)</p> <p>Decreto Law 198/2012 de 24/08 FATURAS E OUTROS DOCUMENTOS COM RELEVÂNCIA FISCAL (http://info.portaldasfinancas.gov.pt/NR/rdonlyres/907FD2F4-9A9C-485D-8A99-FD164BF9FCEC/0/Decree-law%20n%20_198_2012_24_08.pdf)</p>

	Transparency international, corruption perception index Portugal (https://www.transparency.org/country/#PRT)
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
1.2.1	The legality of ownership and land use can be demonstrated for the Supply Base.
Finding	<p>In Portugal, land ownership and management is regulated in line with point 1_1_Legal rights to harvest. (Annex C2, FSC CW NRA).</p> <p>The Real Estate Cadastre (Cadastro Predial), the Finances Matrix (Matriz das Finanças) and the Real Estate Registry (Registo Predial) constitute an inseparable part of the management of property and of the rural and urban buildings, as well as of the acts practiced on them (building refers to any real estate property being that rural or urban, agricultural or forest, comprising edification or not):</p> <ul style="list-style-type: none"> - The Real Estate Cadastre strictly defines the characteristics of each rustic or urban building, namely the location, configuration, limits and areas of the property and its built-up parts, making it based on orthophotomaps with official validity. The information is provided through the Internet in the webpage of General Directorate of Territory, here; - The Finances Matrix, which is divided into a rustic land matrix and urban land matrix, constitutes the fiscal inventory of all rural and urban properties of each village or county, to which it has to be reported, early or later, any acts that alter the features, change of use or owner, among others, in order to formalize these acts; - The Real Estate Registry, which takes place in the land registry office, is the official archive where all property rights and other rights as well as charges on the real estate are registered and confirmed, without updated knowledge of which no legal act (purchase, sale, Mortgage, etc.) can be carried out on a rustic or urban building, or on a part or fraction of such. <p><u>53% of territory is covered</u> by the Real Estate Cadastre (Cadastro Predial) providing a consistent and unequivocal correspondence between the information provided by the Finances Matrix and the Land Registry Office based on the attribution of an unique Land Identification Number (DL 172/95).</p> <p>In the conservatory of the land registry (Conservatória do Registo Predial) the ownership of each building is officially registered as well as the identification of its owners and any other rights or obligations on the building or the easements that condition it are registered.</p> <p>In the books of the land registry, nowadays largely computerized, each registered building has a land description, where the attributes that correspond to it are inscribed and recorded. The real estate description has unique a numerical sequence followed by the date, with a brief description of the components of the building, its confrontations (delimitations) and the article of the matrix, in which the inscriptions of the owners of the property and other information is recorded.</p> <p>Without the property description coinciding with that of the Finances Real Estate Matrix, and without the respective owner-owner registration being in compliance, it is not possible to</p>

	<p>formalize any transaction or legal related over the building. The Geo-Referenced Real Estate Cadastre consolidates this correspondence.</p> <p>The usual way of identifying the properties is by the Real Estate registry (Caderneta Predrial), which is an extract or datasheet from the Real Estate Matrix of the Finances Department. It is common knowledge that rustic and urban buildings are inscribed in the finances matrix, above all, because these services send, to the owner, a list of the respective articles each year (with the reference to properties not quoted in less value, as is often the case of rural properties), indicating the value of the property, the tax on the properties to be paid, called Property Municipal Tax (IMI).</p> <p>Assessment of law enforcement</p> <p>A search on the database of the Institute for the Financial Management and Legal Equipment [instituto de gestão financeira e equipamentos de justiça] on lawsuits related to illegal use of third person private property, tree thefts and illegal logging came back with less than 10 legal processes during the period of 20 years (1,2,3) GNR [National Guard] was contacted to supply statistical data about offenses related to the legality of ownership and there is no registry of offenses. Through the evaluation of the findings the risk is considered as low, since a reduced number of occurrences is identified and the extent of the impact that might be caused by occurrences of this nature is negligible.</p> <p>Nevertheless, since the geometric cadastre of the rural real estate, covers only 53% of the country, in areas where the cadastre is not available, the biomass producer shall ensure that the feedstock is sourced legally, with the acknowledgement of the property owner, using the legal instruments described above, hence specified risk is identified for areas without geometric cadastre. For areas where geometric cadastre of the rural real estate is available, the risk is evaluated as low.</p>
<p>Means of Verification</p>	<p>Description on the Land Registry (Descrição na Conservatória do Registo Predial)</p> <p>Content certificate matrix article of tax office (Certidão de teor do artigo de Matriz da repartição de finanças) & land notebook (Caderneta predial) is the fiscal document which confirms taxes payment.</p> <p>Judicial final and unappealable decision (Sentença judicial transitada em julgado).</p> <p>Notarial deed (Escritura notarial).</p> <p>Testament (Testamento)</p> <p>Forest Renting/leasing contract (Contrato de Arrendamento Florestal)</p> <p>For Collective or Comercial entities the extract from the commercial register (Certidão do Registo Comercial) to prove the specific responsibilities of owners/managers/presidents</p> <p>Purchase documents</p> <p>http://elearning.ipca.pt/1213/pluginfile.php/82971/mod_resource/content/1/sumarios_reais_11_12.pdf</p>
<p>Evidence Reviewed</p>	<p>Government sources:</p> <ul style="list-style-type: none"> •Constitution(Constituição da República Portuguesa) http://www.parlamento.pt/Legislacao/Documents/constpt2005.pdf •Cadastre at Direção Geral do Território: http://www.dgterritorio.pt/cadastro/cadastro_geometrico_da_propriedade_rustica__cgpr_/consultar_seccoes_cadastrais/ <p>Non-Government sources</p> <ul style="list-style-type: none"> • Transparency International's Corruption Perception Index 2014 at Transparency International <p>The global coalition against corruption – https://www.transparency.org/cpi2015/results</p>

	<ul style="list-style-type: none"> •Worldwide Governance Indicators Report at World bank: http://info.worldbank.org/governance/wgi/index.aspx#reports •"O cadastro e a propriedade rustica em Portugal";Fundação Francisco Manuel dos Santos eRodrigo Sarmento de Beires, May/2013 (https://www.ffms.pt/upload/docs/o-cadastro-e-apropriacao-rustica-em-portugal_ypUM5ASBAUmUpHUIgJtp0A.pdf)
<p>Risk Rating</p>	<p> <input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA </p>

	Indicator
1.1.3	The feedstock input profile is described and categorised by the mix of inputs.
Finding	<p>As described in previous indicators Primary Feedstock comes mainly from private properties and consist on several species: mainly Pines and Eucalyptus for pellets production and residual forest biomass for drying. Other sources of feedstock are by products from sawmills and other timber industry consisting on shavings, sawdust and chips.</p> <p>There is no specific legislation regulating classification of wood/timber harvested in Portugal in terms of species, quantities or qualities.</p> <p>Industrial use of Eucalyptus and Pines ensure that they are adequate classified and measured. Felling manifests require identification of species and volumes and are mandatory for every forest species for industrial use.</p> <p>Since the supply chains are usually short, reliable information regarding the feedstock can be gathered in collaboration with the forest owners when necessary. Hence, accurate classification and description of type, species, and categorization of roundwood and residual wood material, as well as the approximate proportion of roundwood from final felling, is possible for Biomass Producers.</p> <p>Based on the available information, the risk for this indicator has been assessed as Low.</p>
Means of Verification	<p>Copy of delivered felling manifest to Forest Authorities (ICNF) for all species used in industrial purposes</p> <p>Invoices</p> <p>Transport/shipping documents</p> <p>Waybills</p> <p>Feedstock input records</p>
Evidence Reviewed	<p>Estrategia Nacional das Florestas (https://dre.pt/application/file/66432612); ICNF portal (http://www.icnf.pt/portal/icnf/do cref/enf)</p> <p>Inventario Florestal Nacional IFN6, preliminary results (IFN6 - Resultados preliminares.pdf); ICNF portal Decreto Law 174-1988 manifesto corte (https://dre.pt/application/file/374768); ICNF portal(http://www.icnf.pt/portal/icnf/serv/formularios/manif/man-cort-arr-arvor)</p> <p>Decreto Law 198/2012 de 24/08 FATURAS E OUTROS DOCUMENTOS COM RELEVÂNCIA FISCAL (http://info.portaldasfinancas.gov.pt/NR/rdonlyres/907FD2F4-9A9C-485D-8A99-FD164BF9FCEC/0/Decree-law%20n%20_198_2012_24_08.pdf)</p>
Risk Rating	<p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>

	Indicator
1.3.1	Feedstock is legally harvested and supplied and is in compliance with EUTR legality requirements.
Finding	<p>Regulation (EU) No 995/2010 (RUEM), of 20 October, entered into force in March 2013, and Decree-Law no. 76/2013, for its application in Portugal, was published on 5 Of June of the same year. The ICNF is the competent authority for the application of the EUTR in Portugal.</p> <p>Within the framework of the EUTR, two types of agents are defined: The Operator, understood as any singular or collective person who places on the market wood or wood products, and the Trader understood as any natural or collective person who in the course of a commercial activity sells or purchase on the internal market of the European Union (EU) wood or wood products already placed on the internal market.</p> <p>Operators must have due diligence system in place for each wood/timber acquisition, which includes procedures for access to information, risk assessment and risk mitigation. Traders must maintain relevant information about suppliers and buyers of products as well as volumes traded. This information must be kept and be provided to competent authorities upon request. Operators placing timber on the EU market for the first time should provide records of where the timber is originated, species, and quantities.</p> <p>In Portugal operators are required to register the operator through the system of initial registration of operators, available on the ICNF portal at http://www.icnf.pt/portal/florestas/fileiras/reg-op. Up to November 2016, a total of 3,357 operators are registered in the RIO system, of which 3,148 already have their active account [EUTR @November 2016].</p> <p>The Competent Authority in Portugal for ensuring implementation of the EUTR is Institute for Nature Conservation and Forests (ICNF). The enforcement authority is the National Republican Guard (GNR) which conducts enforcement according to ICNF procedures. Since the start of 2015 a far-reaching regime of inspections has begun. From January 2015 to April 2016 ICNF has conducted 113 inspections with no contraventions. Also for the same period GNR has conducted 265 inspections with one contravention.</p> <p>DL 174/88 (felling declaration) applies to all forest species, which obliges the registration of species and quantities. After felling, the quantities and species being sold must be declared.</p> <p>For cork oak, there is the cork production declaration form. The publication of legislation establishing protection measures for the cork oak and the holm oak – Decree-Law no. 169/2001, dated 25 May, art. 14 – makes the use of a new cork production declaration mandatory. The declaration is obligatory for all producers of raw cork that is to be sold or consumed by the producer. The declaration must be filed with the ICNF headquarters by 31 December in the year of extraction.</p> <p>The declaration of felling, pruning, and circulation of conifer wood, set out in article 6 of Decree-Law no. 123/2015, dated 3 July, must be obligatorily provided in advance whenever:</p> <ol style="list-style-type: none"> it concerns the felling, felling, and transport, or transport of wood from the felling of, conifers that are hosts of the pine wood nematode in continental territory; it concerns the pruning of host conifers in continental territory.

	<p>The new legal framework applying to the harvesting, transportation, storing, transformation, import, and export of Pinus pinea L. in continental territory, which was approved by Decree-Law no. 77/2015, dated 12 May, is effective as of 10 August 2015.</p> <p>The regulations require that the ICNF is given advance notice of any economic activity or operation involving the harvesting, transportation, storing, transformation, import, and export of Pinus pinea L. and that those carrying out such activities are registered.</p> <p>The legal framework applicable to the application of resin and the circulation of pine resin in continental territory was approved by Decree-Law no. 181/2015, dated 28 August. This law is effective as of 28 September 2015, with the exception of articles 6 to 9, 'prior notification' and 'registration of a resin operator', which are effective as of 1 January 2016.</p> <p>The regulations require that the ICNF is provided with advance notice of the extraction of pine resin, its import and export, as well as transportation, storing, and entry to an establishment for the first industrial transformation, and that resin operators are subject to registration.</p> <p>In Portugal, tariffs are not differentiated by species or quantity.</p> <p>The focus of the referred inspection activities is:</p> <ul style="list-style-type: none"> • Cork Oak, Holm Oak and Holly operations and also riparian vegetation and protected areas; • Conversion from forest to plantations for areas larger than 350 ha or other uses for areas greater than 50 ha; • The National Action Plan for Control of NMP applies to all conifers and includes a strict phytosanitary plan which requires up-front registration of all operators and notification to authorities, prior to commencement of harvesting, transport and processing of wood (some of cuttings detailed on Action Plan are obligatory); • In the case of premature cutting licenses, no evidence was found in the ground of any implementation of this law. <p>In 2016, SEPNA registered:</p> <ul style="list-style-type: none"> - 247 infractions regarding the illegal cutting of protected species; - 295 infractions regarding the circulation of coniferous wood without the felling and thinning manifest; - 23 infractions related to the circulation of wood without mandatory documents such as invoices, delivery notes, among others. <p>The number of surveillance activities which led to identification of the above infractions wasn't disclosed.</p> <p>As stated on indicator 1.2.1, the risk of wood being cut without confirmation of ownership is considered as low.</p> <p>The information above shows the presence of a strong legal framework and also the effective surveillance and enforcement of the legal requirements. The verification means available to identify the legality of wood are diverse and, therefore, the risk is considered low.</p>
<p>Means of Verification</p>	<p>Written permit referring applicable legislation in all exceptional cases referred above;</p> <p>Operator registry and previous notification in cases of all conifers because of Nematode Pine Plan NMP;</p> <p>EUTR Operator Registry:</p> <p>1) Information about the wood/timber products which shall include quality, quantity, the supplier, origin country, and conformity with national legislation;</p>

	<p>2) Risk evaluation- of the illegality of the timber by operator of the supply chain, based on the collected information.</p> <p>3) Risk minimization - by additional information, verifications if the evaluation reveals specified risks.</p>
<p>Evidence Reviewe d</p>	<p>EUTR, implementation assessment (2013-2016) http://www.icnf.pt/portal/florestas/fileiras/resource/docs/ruem-nov2016 Cutting Permission in Law n.º 33/96, at 17/08 (article 7th) https://dre.pt/application/dir/pdf1sdip/1996/08/190A00/25682573.pdf Cork oak and Holm oak (Quercus suber and Quercus rotundifolia):</p> <ul style="list-style-type: none"> • DL155/2004, de 30/06 • DL 169/2001, de 25/05 <p>Ilex aquifolium:</p> <ul style="list-style-type: none"> • DL 423/89, de 4/12 <p>Pinus Nematode:</p> <ul style="list-style-type: none"> • Dec.Retificação n.º 38/2015 de 01/09 • DL 123/15, at 3/07 • DL 95/2011, de 8/08 • DL 154/05 6/09 • Dec. n. 30-A/2011, de 7/10 <p>Cuttings before mature of Pinus pinaster and Eucalyptus:</p> <ul style="list-style-type: none"> • DL173/88,17/05 <p>Harvesting manifest:</p> <ul style="list-style-type: none"> • DL 174/88, 17/05 <p>Municipal licenses of vegetation destruction:</p> <ul style="list-style-type: none"> • DL 139/89 <p>High risk areas for harvesting:</p> <ul style="list-style-type: none"> • Desp. 17 282/2003 <p>Operational cuttings on forest regime areas:</p> <ul style="list-style-type: none"> • Desp. 18355/2008 <p>Riparian vegetation destruction:</p> <ul style="list-style-type: none"> • Law 54/2005 15/11 . <p>Environment law nº 19/14 de 14/04</p> <ul style="list-style-type: none"> • DL 151-B/2013 de 31/10 https://dre.pt/application/file/513900 • DL 49/05, de 24/02 • DL 197/2005, de 8/11 <p>Timber Operator Registry:</p> <ul style="list-style-type: none"> • DL76/2013 at 5/06 • EUTR: DL nº76/2013 de 5/06 artºs 3º,8º at https://dre.pt/application/dir/pdf1sdip/2013/06/10800/0322203225.pdf • (UE)Regulation n.º 995/2010 artºs 4º, 5º, 6º http://www.icnf.pt/portal/florestas/filawras/resource/docs/reg/regulamento-995-2010 <p>Waste and residues laws: http://www.pgdlisboa.pt/Laws/Law_mostra_articulado.php?nid=981&tabela=Law_velhas&nver_sao=4&so_miolo=</p> <p>Energetic purposes forest biomass definition: https://dre.pt/application/conteudo/70064732 https://dre.pt/application/dir/pdf1sdip/2011/01/00600/0017300175.pdf</p>

	<p>Government sources</p> <ul style="list-style-type: none"> • APA-Agência Portuguesa de Ambiente at http://apambiente.pt/index.php; • Municipalities at (<a href="http://www.cm-<NAME>.pt/">http://www.cm-<NAME>.pt/); • SEPNA-Serviço da Protecção da Natureza e do Ambiente/GNR- Guarda Nacional Republicana at (http://www.gnr.pt/default.asp?do=5r20n/DF.zv55n1/Zv55n1) • Instituto da Conservação da Natureza e Florestas at page http://www.icnf.pt/portal/florestas/fiLawras/reg-op; • ICNF Report:(http://www.icnf.pt/portal/florestas/fiLawras/resource/docs/icnf-ruem)
Risk Rating	<p> <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA </p>

	Indicator
1.4.1	<p>Payments for harvest rights and timber, including duties, relevant royalties and taxes related to timber harvesting, are complete and up to date.</p>
Finding	<p>In Portugal it is not applicable payments for harvest rights and timber, including duties, relevant royalties and taxes related to timber harvesting such as stumpage fees and other volume based fees.</p> <p>Only taxes related to timber harvesting are applicable to all economic activities such as value added taxes (VAT) and income taxes (IRS and IRC).</p> <p>VAT (IVA) taxes: A normal tax rate of 23% VAT is applied to sale of wood. In special cases, a VAT reduction to 6% can be applied to the owner of 'standing wood' or 'standing stock sales'; or even VAT exemption if the owner is a farmer or forester. Invoices must be issued by the seller, but self-invoicing by the buyer may occur in exceptional circumstances if some conditions are met (previous agreement, data conformity, etc.). As no specific evidence of irregularity has been identified in relation to payment of VAT, this requirement is considered Low risk. The payment of VAT is a simple requisition that is easy to verify and legally undertake by both entities (seller and buyer). The exceptional regimes of reduced taxes or exemption are in place to include the cases of forest owners with special profiles as famer or forester.</p> <p>Income taxes (IRS & IRC): Income taxes are applied according to individual or collective fiscal laws. It was not found any specific evidence of irregularities about income taxes related to harvest companies. Fiscal Authorities are Autoridade Tributária, which makes join inspections on roads together with GNR- Guarda Nacional Republicana.</p> <p>In 2016, SEPNA (Department of the National Guard responsible for nature related activities) registered 26 infractions related to wood circulating without purchase invoice or delivery documents.</p> <p>According to the available information, this indicator is classified as low risk.</p>
Means of Verification	<p>Valid invoice/receipts Valid declaration of taxes non-debt IES_ Annual Declaration</p>

	Proof of Annual declaration IRS/IRC Taxes Single Report
Evidence Reviewed	<p>VAT Code CIVA:</p> <ul style="list-style-type: none"> DL n.º 102/2008, de 20/6: artº2º 1-a);artº9º 32)List I nº4. Anexo A- IV <p>Individual Income Code to Singular Persons:</p> <ul style="list-style-type: none"> DL nº 442-A/88 artº4º nº3,nº4 Updated by Law nº67/2015, de 06/07 Preâ. nº9, artº3 nº1a);nº4; artº4º nº1, nº3 nº4 artº34º <p>Comercial Income Code to collective entities</p> <ul style="list-style-type: none"> DLnº 442-B/88 Updated by Law n.º 2/2014 de 16/12, Law nº3/2014 de 16/12 & Law nº4/2014 de 16/12 artº1º, artº2º, artº 3º, artº18º-nº7 ; artº20º nº1 g) artº23º nº2 k) Port. nº 55/2010 21/01 artº2º <p>Government sources</p> <ul style="list-style-type: none"> Autoridade Tributária e Aduaneira at: https://www.portaldasfinancas.gov.pt/pt/home.action Autoridade Tributária e Aduaneira: VAT Exemption and reduction at: http://info.portaldasfinancas.gov.pt/NR/rdonlyres/9A86386D-7EB8-447F-9EAC-CEB67C206BD2/0/INFORMA%C3%87%C3%83O.3526.pdf Autoridade Tributária e Aduaneira: Self invoicing by the buyer: http://info.portaldasfinancas.gov.pt/NR/rdonlyres/A4FB3349-0071-47FC-97EC-ADE2061C094A/0/Informacao_5332.pdf
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
1.5.1	Feedstock is supplied in compliance with the requirements of CITES.
Finding	There are no trees in Portugal belonging to CITES appendices. Also it was not found any direct effect of harvesting or forest management over CITES listed species
Means of Verification	List of purchased species
Evidence Reviewed	<p>Portuguese legislation:</p> <ul style="list-style-type: none"> • DL211/2009, 03/09, artº2º, artº4ºartº9º, artº13º • Port nº1225/2009 de 12/10 ; Portaria nº 1226/2009 de 12/10 • Port nº 7/2010 de 05/01 •Port. 60/2012 de 19/03 <p>EU legislation:</p> <ul style="list-style-type: none"> • Council Regulation (EC) No 338/97 of 9 December 1996 on the protection of species of wild fauna and flora by regulating trade therein, article 4, 5, 7, 8 (http://eurlex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:1997R0338:20080411:EN:PDF) • Commition Regulation (CE) 865/2006, 4th May • Commition Regulation (UE) 2017/160, 20th January • Date of CITES application on EU: JOUE L 189, de 2015-07-17 • European Union page at: http://ec.europa.eu/environment/cites/pdf/trade_regulations/KH7707262PTC.pdf <p>CITES</p> <ul style="list-style-type: none"> • www.cites.org • ICNF page: http://www.icnf.pt/portal/icnf/serv/formularios/cites • CITES Reports: https://cites.org/sites/default/files/reports/13-14Portugal.pdf
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
1.6.1	Feedstock is not sourced from areas where there are violations of traditional or civil rights.
Finding	<p>Portugal and Portuguese forest sector is not associated with violent armed conflict, including that which threatens national or regional security and/or linked to military control. The country is not covered by a UN security ban on exporting timber or any other international ban on timber export, also there are not individuals or entities involved in the forest sector that are facing UN sanctions.</p> <p>Portugal is well positioned at all international reports:</p> <ul style="list-style-type: none"> • Corruption Perception Index scores 63 meaning low perceived level of corruption; • Worldwide Governance Indicators (WGI) from 73.3 to 84.13 (1-100points). The WGI report six aggregate governance indicators for over 200 countries and territories over the period 1996-2014, covering i) Voice and Accountability, ii) Political Stability and Absence of

	<p>Violence/Terrorism, iii) Government Effectiveness, iv) Regulatory Quality, v) Rule of Law, and vi) Control of Corruption.</p> <p>On the other side Portugal (including human rights, illegal logging, forest and timber) is not listed in alarming reports or indexes such as:</p> <ul style="list-style-type: none"> • Committee to Protect Journalists Impunity Index; • Human Rights Watch; • Global Witness • Chatham House • Amnesty International <p>There are not indigenous or traditional people in Portugal that could claim traditional rights to lands, forests and other resources, based on long established custom or traditional occupation and use. Labour rights are respected including rights as specified in ILO Fundamental Principles and Rights at work. Portugal has ratified all 8 Fundamental ILO Conventions.</p> <p>According to the available information, this indicator is classified as low risk.</p>
<p>Means of Verification</p>	<p>Identity card of workers. Valid written contract Valid visa and residence working permit for foreigners out of EU, Iceland, Liechtenstein, Norway, Turkey, Brasil (with equality rights status), Cabo Verde, Guiné Bissau, São Tomé e Príncipe. Obligatory insurance document. Updated document of social security payment IRS /IRC taxes - Relatório Único.</p>
<p>Evidence Reviewed</p>	<ul style="list-style-type: none"> •Transparency International http://www.transparency.org/cpi2015#map-container •UN Sanctions List at:https://www.un.org/sc/suborg/en/sanctions/un-sconsolidated-list •World Bank: Worldwide Governance Indicators http://info.worldbank.org/governance/wgi/index.aspx#countryReports •Committee to Protect Journalists https://www.cpj.org/reports/2014/04/impunity-index-gettingaway-with-murder.php •Human Rights Watch: http://www.hrw.org/world-report/2015 •Global Witness: www.globalwitness.org Chattam House Illegal Logging Indicators Country Report Card http://www.illegal-logging.info •Amnesty International:https://www.amnesty.org/en/documents/pol10/0001/2015/en/ <p>Labour Code:</p> <ul style="list-style-type: none"> •Law n.º 7/09 12/02 cap I and updates like Law 69/13, de 30/08 includes obligatory professional training (http://www.act.gov.pt/(ptPT)/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx) •Republic Assembly Resolution nº109/2012 de 08/08 art 6º (Convention 184 doesn't apply to industrial forest work) •ILO Convention numbers 87, 98, 29, 105, 100, 101,129 e 138, 184 (http://dre.pt/util/getpdf.asp?s=diad&serie=1&iddr=2012.153&iddip=20121525) •Foreign workers: Law n.º 23/2007 at 04/07 artº59º 5a) and updates (http://www.pgdlisboa.pt/Laws/Law_mostra_articulado.php?nid=920&tabela=Laws&so_miolo) •Labour Conditions Authority-ACT http://www.act.gov.pt/(pt-PT)/Paginas/default.aspx. •Ministry of Solidarity, Employment and Social Security http://www.portugal.gov.pt/pt/ministerios/mtsss.aspx •Employment and Professional Training Institute at https://www.iefp.pt/

- Ministry of Internal Administration
<http://www.portugal.gov.pt/pt/ministerios/mai/equipa.aspx>
- Immigration And Borders Services <http://www.sef.pt/portal/V10/EN/asp/page.aspx>
- SETAA-Sindicato da Agricultura, Alimentação e Florestas: at <http://www.setaa.pt/>
- UGT-União Geral de Trabalhadores at <https://www.ugt.pt/>
- CGTP - Confederação Geral de Trabalhadores Portugueses at <http://www.cgtp.pt/>
- ANEFA - Associação Nacional de Empresas Florestais, Agrícolas e do Ambiente at: <http://www.anefa.pt/>
- UNAC - União da Floresta Mediterrânica <http://www.unac.pt/>
- Forum Florestal- Estrutura Federativa da Floresta Portuguesa at <http://forumflorestal.pt/>
- Forestis- Associação Florestal de Portugal <http://www.forestis.pt/>
- FNAPF- Federação Nacional das Associações de Proprietários Florestais
<http://www.fnafp.pt/>
- Confagri-Confederação Nacional das Cooperativas Agrícolas e do Crédito Agrícola de Portugal, CCRL at
<http://www.confagri.pt/>
- CNA - Confederação Nacional de Agricultura at <http://www.cna.pt/>
- CAP- Confederação dos Agricultores de Portugal <http://www.cap.pt/>
- Transparency International <http://www.transparency.org/cpi2015#map-container>
- UN Sanctions List at:<https://www.un.org/sc/suborg/en/sanctions/un-sc-consolidated-list>
- World Bank: Worldwide Governance Indicators
<http://info.worldbank.org/governance/wgi/index.aspx#countryReports>
- Committee to Protect Journalists <https://www.cpj.org/reports/2014/04/impunity-index-gettingaway-with-murder.php>
- Human Rights Watch: <http://www.hrw.org/world-report/2015>
- Global Witness: www.globalwitness.org
- Chattam House Illegal Logging Indicators Country Report Card
<http://www.illegal-logging.info>
- Amnesty International:<https://www.amnesty.org/en/documents/pol10/0001/2015/en/>
- Labour Code:**
- Law n.º 7/09 12/02 cap I and updates like Law 69/13, de 30/08 includes obligatory professional training ([http://www.act.gov.pt/\(pt-PT\)/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx](http://www.act.gov.pt/(pt-PT)/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx)
- Republic Assembly Resolution nº109/2012 de 08/08 art 6º (Convention 184 doesn't apply to industrial forest work)
- ILO Convention numbers 87, 98, 29, 105, 100, 101,129 e 138, 184 (<http://dre.pt/util/getpdf.asp?s=diad&serie=1&iddr=2012.153&iddip=20121525>
- Foreign workers: Law n.º 23/2007 at 04/07 artº59º 5a) and updates (http://www.pgdlisboa.pt/Laws/Law_mostra_articulado.php?nid=920&tabela=Laws&so_miolo
- Labour Conditions Authority-ACT [http://www.act.gov.pt/\(pt-PT\)/Paginas/default.aspx](http://www.act.gov.pt/(pt-PT)/Paginas/default.aspx).
- Ministry of Solidarity, Employment and Social Security
<http://www.portugal.gov.pt/pt/ministerios/mtsss.aspx>
- Employment and Professional Training Institute at <https://www.iefp.pt/>
- Ministry of Internal Administration
<http://www.portugal.gov.pt/pt/ministerios/mai/equipa.aspx>
- Immigration And Borders Services <http://www.sef.pt/portal/V10/EN/asp/page.aspx>
- SETAA-Sindicato da Agricultura, Alimentação e Florestas: at <http://www.setaa.pt/>
- UGT-União Geral de Trabalhadores at <https://www.ugt.pt/>
- CGTP - Confederação Geral de Trabalhadores Portugueses at <http://www.cgtp.pt/>

	<ul style="list-style-type: none"> •ANEFA - Associação Nacional de Empresas Florestais, Agrícolas e do Ambiente at: http://www.anefa.pt/ •UNAC - União da Floresta Mediterrânica http://www.unac.pt/ •Forum Florestal- Estrutura Federativa da Floresta Portuguesa at http://forumflorestal.pt/ •Forestis- Associação Florestal de Portugal http://www.forestis.pt/ •FNAPF- Federação Nacional das Associações de Proprietários Florestais http://www.fnapf.pt/ •Confagri-Confederação Nacional das Cooperativas Agrícolas e do Crédito Agrícola de Portugal, CCRL at http://www.confagri.pt/ •CNA - Confederação Nacional de Agricultura at http://www.cna.pt/ •CAP- Confederação dos Agricultores de Portugal http://www.cap.pt/ •BALADI- Federação Nacional dos Baldios
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk RA <input type="checkbox"/> Unspecified Risk at

	Indicator
2.1.1	Forests and other areas with high conservation values are identified and mapped.
Finding	<p>Most important forest areas with high concentration of nature conservation values have been identified and designated as classified or protected areas at national and/or EU level (Natura 2000 sites).</p> <p>Even though significant and important HCV areas critical to conservation are designated as protected and classified areas at national or EU level (Natura 2000), a large number of smaller areas or biotopes important to biodiversity or as classified priority species and habitats could be unidentified.</p> <p>Using the definitions High Conservation Values provided by FSC forest management standard [9] the following attributes will be considered:</p> <p>HCV 1 – Species diversity: concentrations of biological diversity including endemic species, and rare, threatened, or endangered species that are significant at global, regional, or national levels.</p> <p>i) Classified areas [7]: The total classified area protected by the Rede Nacional de Áreas Protegidas (RNAP) and the Rede Natura2000 covers around 20 per cent of Portugal’s continental territory. Classified areas comprise RNAP protected areas, sites from the national list [which includes sites of community importance (SICs)] and the Zonas de Protecção Especial para Aves (ZPE) of the Natura2000 network. Municipal protection areas must also be considered. Other classified areas are also protected by international commitments agreed upon by the Portuguese state (e.g. Ramsar Convention sites, biogenetic reserves, biosphere reserves). Although not included in classified areas, other areas come under this umbrella, such as Important Bird Areas (IBAs), sites of international importance for the conservation of birds on a global scale. http://www.icnf.pt/portal/naturaclas/cart.</p> <p>ii) Endangered species according to the classification adopted by the International Union for the Conservation of Nature (IUCN) to endangered species:</p> <ul style="list-style-type: none"> - Critically endangered (CR) - Endangered (EN) - Vulnerable (VU). - Protected species within the legal conservation instruments in force in Portugal <p>Habitat and Birds Directives; CITES Bern Convention Bonn Convention Red Book of Vertebrates from Portugal Red book and Atlas of Bryophytes http://www.icnf.pt/portal/naturaclas/patrinatur/especies</p> <p>iii) Endemic species</p> <p>The Mediterranean basin, in which Portugal is found, contains around 25,000 species of plants, of which 50 per cent are endemic to the region. Of almost 4,000 species of flora listed for Portugal (continental, Azores, and Madeira), around 450 are Lusitanian endemism (444 in total; 143 on the continent, plus 76 from the Azores, 158 from Madeira, and 67 from Macaronesia), and 346 are endemic to the Iberian Peninsula. 3,314 species of flora are listed</p>

for the continent, 1,006 in the Azores archipelago, and 1,233 in Madeira. This is the region that shelters the highest number of endemism (species that do not exist elsewhere) – 157 in all. In the Azores the number reaches 78, while on the continent it is 150.

As for invertebrates, information is scarce, but there are statistics for insects: so far, 402 taxa have been registered (369 species and 33 subspecies) which are recognized as Lusitanian endemism.

- iv) Critical seasonal use areas including critical areas of refuge, breeding or migration routes in Portuguese territory:

Fauna species may use different types of habitat depending on their life cycle and the season. These habitats can be critical for their importance in the reproductive season or for the availability of food in certain seasons. This designation focuses on the importance of these areas for fauna.

Digital mapping information from the [Manual das Linhas Eléctricas](#) [Manual of Electric Lines] (ICNB 2008) is also used, for reference purposes only, as its scope is limited in this field. This identifies:

- # Autumnal bird migration corridors in south-west Alentejo and the Vicentina coast;
- # Zones of concentration and passage for steppe birds (great and little bustards);
- # Reproduction areas for birds of prey with threatened status;
- # Concentration of winter birds in wetlands;
- # Shelters for bats, considered important at a national, regional, and local level.
- # As for invertebrates, information is scarce, but there are statistics for insects: so far, 402 taxa have been registered (369 species and 33 subspecies) which are recognized as Lusitanian endemism.

HCV 2 – Landscape-level ecosystems and mosaics: intact forest landscapes and large landscape-level ecosystems and ecosystem mosaics that are significant at global, regional or national levels, and that contain viable populations of the great majority of the naturally occurring species in natural patterns of distribution and abundance.

- i) Cork oak and holm oak formations occurring in Portugal in the heathlands of the Tagus and Sado (cork) and Guadiana Valley (oak) under the form of woodlands or montados.

HCV 3 – Ecosystems and habitats: rare, threatened, or endangered ecosystems, habitats or refugia

- i) [Habitats Directive \(2007-2012\)](#)

Covers habitats listed in the Habitats Directive (Annex I) which, in the last national Habitats Directive report (2007–2012), were listed in categories (U1) – unfavourable inadequate – and (U2) – unfavourable bad.

- ii) [Natura 2000 database](#)

Natura2000's sectorial plan is the main source of information used to identify habitats in classified areas. In the case of non-classified areas, the Habitats Directive implementation reports can be consulted for information on habitat conservation (favourable, unfavourable inadequate, unfavourable bad).

- iii) Portugal approved its ratification of the Convention on Biological Diversity (CBD) via DL no. 21/93, dated 29 June, which became effective in our country on 21 March 1994.

The Fifth National Report to CBD had as its main objective a review of implementation of the Convention and an assessment of how far we had come in achieving CBD objectives and the Aichi Biodiversity Targets contained in the Strategic Plan for Biodiversity 2011–2020. It also contributed to the development of the Global Biodiversity Outlook report and the review of the fulfilment of the EU Biodiversity Strategy for 2020. The report covers the state and tendencies

of biodiversity and detected threats, reporting on actions taken towards fulfilling the Aichi Biodiversity Targets and finally sets out, based on experience, topics most deserving of attention in order to achieve a more adequate and broad-reaching implementation of the CBD's COP (Conference of Parties) decisions in Portugal.

HCV 4 – Critical ecosystem services: basic ecosystem services in critical situations, including protection of water catchments and control of erosion of vulnerable soils and slopes. forests located in critical areas in river basins, such as floodplains and sloping areas, as defined and mapped in REN-National Ecological Reserve.

HCV 5 – Community needs: sites and resources fundamental for satisfying the basic needs of local communities or Indigenous Peoples (e.g. for livelihoods, health, nutrition, water, etc.), identified through engagement with these communities or Indigenous People.

HCV 6 – Cultural values: sites, resources, habitats, and landscapes of global or national cultural, archaeological, or historical significance, and/or of critical cultural, ecological, economic, or religious/sacred importance for the traditional cultures of local communities or indigenous peoples, identified through engagement with these local communities or Indigenous Peoples.

i) World Heritage (UNESCO)

Sites identified as World Heritage by UNESCO. In Portugal there are 15 sites identified (<http://www.patrimoniocultural.pt/pt/patrimonio/patrimonio-mundial/portugal/> or <http://www.rpmp.pt/#!sitios/cihc>), of which only two are designated as outstanding natural landscapes ('Paisagem Cultural de Sintra', around 900ha, on the Portuguese mainland, and the 'Floresta Laurissilva na Madeira', on the island of Madeira, covering 15,000ha). The Iberian Risk Assessment also identified rocky landscapes such as the Vale de Foz Côa [Foz Côa Valley], the Douro slopes, and the landscape of Pico island, places that, analysed more closely, are not part of the forestry sector – see the results of the meeting of the working group for category 3 (5 July 2016).

Currently, there are other sites proposed for Portugal under assessment by UNESCO (<https://www.unescoportugal.mne.pt/pt/temas/proteger-o-nosso-patrimonio-e-promover-a-criatividade/patrimonio-mundial-em-portugal>). These are not yet included here.

ii) Cultural heritage (Law no. 107/2001, dated 8 September)

In Portugal there are specific governmental bodies to manage cultural heritage: the General Directorate of Cultural Heritage for the Portuguese Mainland (<http://patrimoniocultural.pt/en/>); Directorate of Services of Cultural Heritage for the Island of Madeira (<http://cultura.madeira-edu.pt/agendacultural/CulturalHeritage/DSPC/tabid/939/language/en-US/Default.aspx>); and the Regional Directorate of Culture for the Azores Islands (<http://www.azores.gov.pt/Portal/en/entidades/srec-dr cultura/?lang=en> and <http://www.iac-azores.org/>).

Among others, these bodies are responsible for: managing the architectural and archaeological built heritage in urban and rural areas, including conservation works in monuments under our care; managing the national museums, World Heritage monuments and museum collections; studying, researching, and disseminating heritage-related information; conserving and restoring movable heritage assets as well as researching, disseminating results, and raising awareness about heritage protection issues.

iii) Classified groves (Law no. 53/2012, dated 5 September)

Additionally, the NRA WG has also looked at national legislation that identifies and protects outstanding grove (arboreta)

	<p>(http://www.icnf.pt/portal/florestas/Arvores.gry?start:int=80&Distrito=&Concelho=&Freguesia=&Processo).</p> <p>The main source of information within this attribute is the application report of the Habitats Directive (2007-2012) as well as the description list of every habitat identified in the Annex 1 of Habitats Directive in Sectorial Plan of the Natura2000 network. Other cartographic information of HCV is included on open GIS like http://www.habeas-med.org/webgis/pt_en/ and http://epic-webgis-portugal.isa.ulisboa.pt.</p> <p>Conclusion:</p> <p>HCV1 – Specified risk The scope of SNAC and RNAP, is the assessment of large areas with significant biodiversity values, meaning that the identification of threats and pressures to conservation attributes, as well as monitoring activities are, performed at a large scale. Hence, the information and mapping available at the level of a large area, such as, a Classified Area may not be sufficiently detailed to ensure the sufficient identification of HCV attributes at the level of the Supply Base (smaller area) The identification of precise HCV attributes at supply base level might not be comprised in the assessments of Protected and Classified Areas, thereby, specified risk is considered. Outside SNAC and RNAP, where less information is available, the risk is also specified.</p> <p>HCV2 – Low Risk It is considered that HCV2 attributes are well identified and mapped.</p> <p>HCV3 – Specified Risk Please refer to 2.1.2.</p> <p>HCV 4 – Low Risk The occurrence of HCV4 attributes is unlikely in the area under assessment. Within the national context, the structure of property, being extremely fragmented, reduces the dependence on ecosystem services and means this is not critical. Furthermore, the probability of forest management activities having a significant impact on the same service is negligible.</p> <p>HCV5 – Low Risk The compromising (impacting) of fundamental needs of indigenous peoples and local communities by management activities is not applicable. In Portugal, the use and enjoyment of common forest land is regulated (Lei dos Baldios [common land law] – Decree-Law no. 165/2015, 17 August). At present, this land does not provide for the basic needs of the adjacent communities.</p> <p>HCV6 – Low Risk Significant cultural features created intentionally by humans are identified and sufficient buffers are applied, since the criteria for identifying HCV 6 for Portugal are based on international or legal frameworks that already foresee the safeguards needed to protect/maintain the cultural values identified. The NRA WG considers the risk of illegal forest management activities threatening HCV 6 as negligible.</p>
<p>Means of Verification</p>	<p>Internet research GIS maps of HCV areas Interviews Priority Classified Habitat and species catalogue. Regional, publicly available data from a credible third party as FSC and PEFC reports</p>

<p>Evidence Reviewed</p>	<p>Law for natural values cadastre: Decree-Law n.º 242/2015 at 15/10 https://dre.pt/application/conteudo/70693924 Bugalho, M. 2011 “Interpretação Nacional das Florestas de Alto Valor de Conservação” Documento de base Trabalhos realizados pelo GT IN FAVC do FSC Portugal HABEAS: http://www.habeas-med.org/webgis/pt_en/ LEAF_EPICWebGiSPortugal: http://epic-webgisportugal.isa.ulisboa.pt/maps/epic?format=image/png;%20mode=8bit&startExtent=-1523000,4400000,-143668,5180000 SNAC : Legislation https://dre.pt/application/file/70698029 RNAP: http://www.icnf.pt/portal/ap/ap Reed Natura 2000: http://www.icnf.pt/portal/naturaclas/rn2000 Important Bird Areas of Portugal at: http://ibas-terrestres.spea.pt/ - Site characterization SIC e ZPE: http://www.icnf.pt/portal/naturaclas/rn2000/p-set/Plan-setdocs Cartography: http://www.icnf.pt/portal/naturaclas/cart -Protected area plans: http://www.icnf.pt/portal/naturaclas/ordgest/poap -Data Base for fauna and flora specific plans: http://www.icnf.pt/portal/naturaclas/patrinatur/especies -Red book for Portuguese Vertebrates (2005): http://www.icnf.pt/portal/naturaclas/patrinatur/lvv - Nesting and wintering Bird Atlas on Portugal (2008): ND online Cartography (2015) http://webgis.spea.pt/AtlasAvesInvernantesMigradoras/ - Reptile and amphibious of Portugal (2008): http://www.icnf.pt/portal/naturaclas/patrinatur/atlas-anfi-rept/anfibios - Fresh water Fish National cartography :http://www.cartapiscicola.org/# - Flora identification: http://www.icnf.pt/portal/naturaclas/rn2000/p-set/psrn-flora -Flora cartographic source: http://www.flora-on.pt/ -National Conservation Plano of threatened Flora information http://www.icnf.pt/portal/naturaclas/patrinatur/conserv-flora-perigo http://naturdata.com/index.php?option=com_content&view=article&id=78&Itemid=60 Electric wire line manual (ICNB 2008) :http://www.icnf.pt/portal/naturaclas/ordgest/aa/resource/doc/man-infra-lin Regional Forest Plans (PROF): http://www.icnf.pt/portal/florestas/profs AIIF :http://www.aiff.org.pt/assets/ESTUDO_Prospetivo_-_Sector-Florestal.pdf AIIF: http://www.aiff.org.pt/assets/Relatorio-de-Characterizacao-da-FiLawra-Florestal-2014-160pCAPA-3-spread....pdf ICNF: http://www.icnf.pt/portal/florestas/ifn/resource/ficheiros/ifn/ifn6-res-prelimv1-1 Planos de Gestão Florestal de areas públicas: http://www.icnf.pt/portal/florestas/gf/pgf/publicitacoes/encerradas Autoridade Florestal Nacional, 2010, Florestat – Aplicação para a Consulta dos Resultados do 5º Inventário Florestal Nacional. Disponível em http://www.icnf.pt/portal/florestas/ifn/ifn5/florestat Reserva Ecológica Nacional https://dre.pt/application/dir/pdf1sdip/2012/11/21200/0630806346.pdf Sistema Nacional de Defesa da Floresta Contra Incêndios: https://dre.pt/application/dir/pdf1sdip/2006/06/123A00/45864599.pdf PANCD https://dre.pt/application/file/65985917 PDR2020 http://www.pdr-2020.pt/site/O-PDR2020/Arquitetura/Area-3-Ambiente-Eficiencia-no-Usos-dos-Recursos-e-Clima/Medida-7-Agricultura-e-Recursos-Naturais/Acao-7.11-</p>
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	<p>Investimentos nao-produtivos/Operacao-7.11.1-Investimentos-nao-produtivos Fundo Florestal Permanente:http://www.icnf.pt/portal/icnf/noticias/gloablnews/fundoflorestal-permanente-ffp Alves, A. M., Pereira, J. S., Correia, A. V., 2012. Silvicultura - A gestão dos ecossistemas florestais. Fundação Calouste Gulbenkian. ICNF http://www.icnf.pt/portal/florestas/aip/aip-monum-pt DRE: http://www.icnf.pt/portal/icnf/legisl/legislacao/2012/Law-n.o-53-2012-de-5-de-setembro.-d.-r.-n.o-172-serie-i</p>
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	<p>Field inspections prior and after harvesting. Training of suppliers for the identification, characterization and mapping of HCV Sample inspections to monitor the application of mitigation measures</p>

	Indicator																																										
2.1.2	Threats to forests and other areas with high conservation values from forest management activities are identified and addressed.																																										
Findin g	<p>Forest operations are identified in the National Report on the Implementation of Directive Habitats and Birds to present threat (present) in 6 habitats and pressure (future) on 8 habits accounting for 3.8% and 5%, respectively, of the total assessments. A similar assessment was performed, having species (except birds) as the scope and the numbers don't differ. Forestry presents threat to 7.7% of the species assessed and puts pressure on 9.6% of the total 426 species considered. To put it into perspective, agriculture shown threat for 13.5% of habitats and 12% of species. Please refer to images below. Forest activities have a significant impact on bird attributes with 30% of the assessed species demonstrating to be threatened, as can be seen in the graphic dedicated to the subject (image 3).</p> <table border="1"> <caption>Habitats - Pressões vs Ameaças</caption> <thead> <tr> <th>Habitat</th> <th>Pressões</th> <th>Ameaças</th> </tr> </thead> <tbody> <tr> <td>Agricultura</td> <td>~10</td> <td>~14.5</td> </tr> <tr> <td>Silvicultura</td> <td>~4</td> <td>~3.5</td> </tr> <tr> <td>Actividade mineira e extractiva e produção...</td> <td>~1</td> <td>~1</td> </tr> <tr> <td>Transportes e corredores de serviços</td> <td>~5</td> <td>~4</td> </tr> <tr> <td>Urbanização, desenvolvimento residencial e...</td> <td>~2</td> <td>~2</td> </tr> <tr> <td>Utilização rec. biológicos além agricultura e...</td> <td>~3</td> <td>~3</td> </tr> <tr> <td>Perturbação humana</td> <td>~17</td> <td>~17</td> </tr> <tr> <td>Poluição</td> <td>~5</td> <td>~5</td> </tr> <tr> <td>Espécies invasoras</td> <td>~22.5</td> <td>~22.5</td> </tr> <tr> <td>Alteração dos sistemas naturais</td> <td>~19</td> <td>~19</td> </tr> <tr> <td>Processos naturais bióticos e abióticos</td> <td>~9</td> <td>~9</td> </tr> <tr> <td>Eventos geológicos, catástrofes naturais</td> <td>~3</td> <td>~3</td> </tr> <tr> <td>Alterão climática</td> <td>~1</td> <td>~1</td> </tr> </tbody> </table>	Habitat	Pressões	Ameaças	Agricultura	~10	~14.5	Silvicultura	~4	~3.5	Actividade mineira e extractiva e produção...	~1	~1	Transportes e corredores de serviços	~5	~4	Urbanização, desenvolvimento residencial e...	~2	~2	Utilização rec. biológicos além agricultura e...	~3	~3	Perturbação humana	~17	~17	Poluição	~5	~5	Espécies invasoras	~22.5	~22.5	Alteração dos sistemas naturais	~19	~19	Processos naturais bióticos e abióticos	~9	~9	Eventos geológicos, catástrofes naturais	~3	~3	Alterão climática	~1	~1
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Image 1 Percentage of assessed habitats affected by one or more pressures/threats of high importance [1]

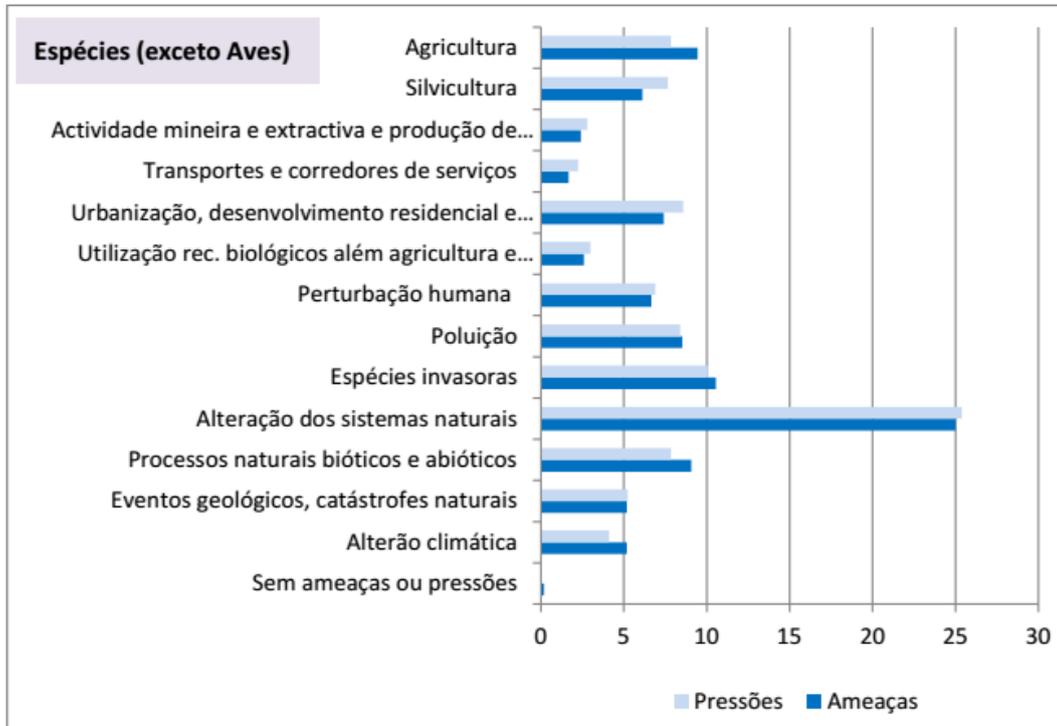


Image 2 Percentage of assessed species (except birds) affected by one or more pressures/threats of high importance [1]

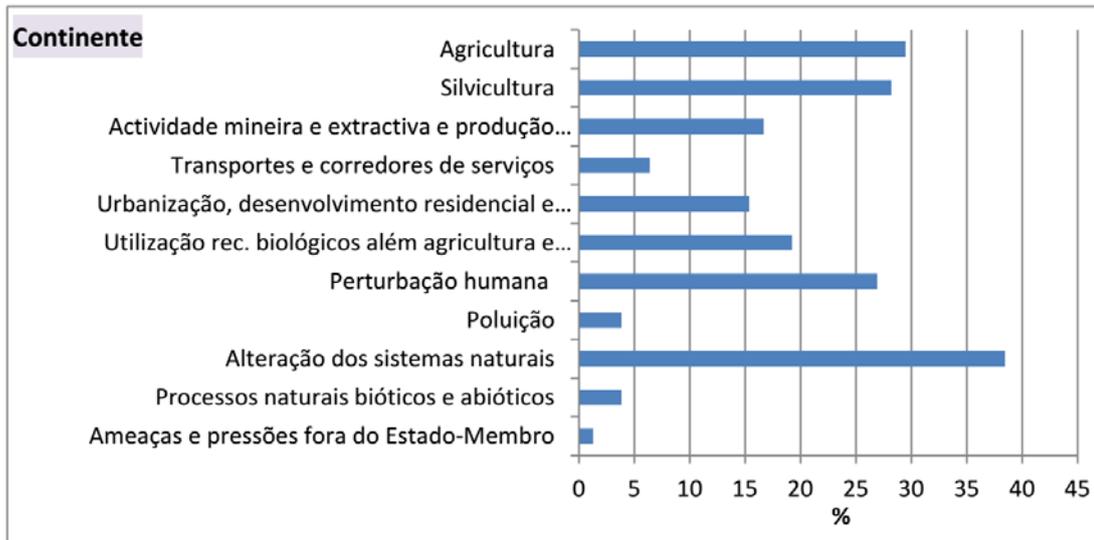


Image 3 Percentage of assessed wintering and nesting birds affected by one or more pressures/threats of high importance [1]

Decree-law nº151-B/2013 [4] Defines the obligation to perform an Environmental Impact Assessment (AIA) on every afforestation and reforestation occurring on areas greater than 350ha (70ha on sensitive areas) or greater than 140ha (30ha in sensitive areas) if the subject area, in conjunction with pre-existent forest stands of the same species, separated by less than 1 km,

would produce a continuous forested area of more than 350ha (70ha in sensitive areas). It also establishes that an AIA must be called when there is a deforestation action on areas greater than 50ha (10ha in sensitive areas). PROF, in several regions (Alto Minho, Baixo Minho, Barroso e Padrela, Nordeste Transmontano), also define a maximum threshold for clear cutting of 10ha. [5]

Decree-law nº 96/2013 (RJAAR) [2] states that afforestation and reforestation actions above 2ha must be preceded of an authorization from ICNF (article nº4). Some exceptions to the above are possible, but constraints are defined on article 5 of this Decree-law. It's important to highlight that there is no exception for previous authorization when the area in question is located total or partially inside SNAC.

It's important to highlight that the article nº9 of RJAAR defines that if an intervention area is situated inside the National Ecologic Reserve, a consult must be addressed to the CCDR as well as the related municipality. The article nº10 defines the factors that should be taken into account in the decision making process including protection of forest against forest fires, hydric related issues, biodiversity and habitat protection, among others.

There are 135 Forest Producers Organizations registered on ICNF data base [3], whose offer multiple services, such as the preparation and implementation of Forest Management Plan, creation and management of Forest Intervention Zones, promotion of forest best practices, management of forest intervention teams, among others.

Forest owners make use of voluntary instruments, such as certification schemes recognized worldwide like Forest Stewardship Council (FSC) and Programme for the Endorsement of Forest Certification (PEFC), or they adopt practices in line with the "guidelines for sustainable forest management", based on the work of the Technical Committee for Standardization nº 145/IPQ (Portuguese Standard NP 4406/2003) which applies pan-European criteria for the sustainable forest management as well as operational level guidelines. At the moment, more than 257 625 ha of forest were certified under PEFC scheme and 376 886 ha under FSC scheme. [1]

There are, simultaneously, several private companies whose have been developing initiatives in order to promote the sustainable management of forest through the creation of forest owners' groups willing to apply best management practices in their properties, and supporting them with preparation to apply for the certification with independent certification bodies. Here are a few examples of this initiatives:

Abastena's Forest Management Group, <http://abastena.pt/ggfa.php>

Unimadeira, <http://unimadeiras.pt/certificacao-gestao-florestal-em-grupo/>

Silvitec: <http://www.silvitec.com/files/190.pdf>

Terrateam: <http://www.terrateam.pt>

APFC: <http://www.apfc.pt/areas.php?aID=56>

UNAC: <http://www.unac.pt/projetos/certificacao-florestal.html>

Certificamais: <http://www.certificamais.pt/>

In Portugal, the bodies responsible for the inspection and surveillance are SEPNA and the Vigilantes da Natureza [Nature Rangers]. In some cases, the municipal authorities take responsibility for inspection themselves. At present, according to the rangers' association, there are around 119 rangers on the continent, 33 in the Azores and 38 in Madeira; the APA – Agência Portuguesa do Ambiente (Portuguese Environment Agency) has 30 rangers and the CCDR - Comissões de Coordenação e Desenvolvimento Regional (Regional Commissions for

Coordination and Development) 26. Each inspection is registered, though no annual reports have yet been identified.

It's under development the Special Program of the National Park Peneda-gerês (PEPNPG) through the Decree-law nº 96/2017 from May 18th. The PEPNPG aims to promote the development and application of conservation measures on several environmental attributes of the first protected area on the country (since 1971).

Decrees-law nº 96/2017, 99/2017, 106/2017, 107/2017, 108/2017 set the start of the development of the Special Program of the following protected areas:

Natural Park of São Mamede (PEPNSSM);
 Natural Park of Arrábida (PEPNA);
 Natural Park of Guadiana Valley (PEPNVG);
 Natural Park of Tejo Internacional (PEPNTI);
 Natural Park of Douro Internacional (PEPNDI);
 Natural Park of Serra de Aire e Candeeiros (PEPNSAC);
 Natural Park of Litoral Norte (PEPNLN);
 Natural Park of Montesinho (PEPNM);
 Natural Park of Sintra Cascais (PEPNSC);
 Natural Park of Ria Formosa (PEPNRF);
 Natural Park of Serra da Estrela (PEPNSE);

Risk conclusion:

HCV1 – Specified Risk

The scope of SNAC and RNAP, is the assessment of large areas with significant biodiversity values, meaning that the identification of threats and pressures to conservation attributes, as well as monitoring activities are, performed at a large scale. Hence, the information and mapping available at the level of a large area, such as, a Classified Area may not be sufficiently detailed to ensure the sufficient identification of HCV attributes at the level of the Supply Base (smaller area). The identification of precise HCV attributes at supply base level might not be comprised in the assessments of Protected and Classified Areas, thereby, specified risk is considered. Outside SNAC and RNAP, where less information is available, the risk is also specified.

Several legal instruments protect areas of significant biological diversity: planos de ordenamento de áreas protegidas (POAP), planos regionais de ordenamento florestal (PROF), planos directores municipais [town planning] (PDM), plano de gestão florestal (PGF), and, in the case of classified areas, a programa de gestão da biodiversidade [biodiversity management programme] (PGB).

Regarding the establishment of projects and programmes aiming to enhance the conservation status of HCV, the LIFE Programme has facilitated the development of a series of projects in Portugal

(<http://ec.europa.eu/environment/life/project/Projects/index.cfm?fuseaction=home.getDocs>), many of which permit contracts with owners as good conservation management practice, support and awareness-raising for owners and schools, and also vertical signs of species' territorial areas. A series of documents is also produced, from simple brochures to manuals of good practice (an example being the conservation manual for the Bonelli's eagle and the good forestry and hunting practice manual). Some projects include action plans for species conservation. Most projects have as their objective the conservation of potential HCV 1 species, being carried out by Natura2000 Network. Some NGOs, such as Sociedade Portuguesa para o Estudo das Aves (SPEA) [Portuguese Society for the Study of Birds]), have formed working groups to monitor

species, such as the Bonelli's eagle working group (GTAB) and the night birds working group (GTAN).
Furthermore, various good practice manuals, leaflets and other relevant information sources are available in the public domain, published by different institutions.

HCV 2 – Low risk

The regulation implemented in Portugal on oak and holm trees and stands, includes a comprehensive legislative framework with a legal action planning and project but also cuttings protection. This legislation also meet forest management measures themselves related to intensity of exploitation, such as the stripping and pruning.

Montado of cork and holm oaks

In landscapes classified as HCV 2 there may exist patches of montado in decline, which is the start of fragmentation. This decline may be the result of bad management practices, biotic and abiotic factors, or a combination of both.

Existing safeguarding measures include:

the application of current legislation (planning, projects and protection against felling). This legislation is well consolidated and disseminated by the various agents involved (owners, managers, and operators); and

A network of R&D dedicated to defining and operationalizing good management practices.

Furthermore, national scale management programmes have been implemented (beneficiation, afforestation, and reforestation) to recover cork oak populations, both in terms of area and in tree health.

The recent expansion of forest management certification in the cork sector shows the results of planning and of the aforementioned measures.

The most current detailed results achieved by management and improvement actions on forest stands of are not fully known, since the full values of the last national inventory (IFN6) are still missing, however it is known that the class of "wooded area with cork oak" had an increase of 6% from 1995 to 2010, and holm oak has decreased 3% in the same period.

HCV 3 – Specified risk

Reffering to the data presented on image 1, 2, 3 (above) and the Information in the [sectorial plan of Natura2000](#) and in the [Third National Application Report of the Habitats Directive \(2007–2012\)](#), specified risk is identified for habitats and species that are subject to threats originating on forestry activities.

Portugal publishes graphics of threats to Portuguese habitats and species (Continent+Azores+Madeira) <http://www.icnf.pt/portal/naturaclas/rn2000/resource/docs/rel-nac-07-12/docs/nat-summ-pt>, as required by arts. 12 and 17 of the report.

The [Natura 2000 network database](#) was updated in 2015 and it contains relevant information about the assessment of each habitat for each Common Importance Site.

Furthermore, Portugal approved its ratification of the Convention on Biological Diversity (CBD) via DL no. 21/93, June 29th, which became effective on 21 March 1994.

[The Fifth National Report to CBD](#) had as its main objective a review of implementation of the Convention and an assessment of how far we had come in achieving CBD objectives and the Aichi Biodiversity Targets contained in the Strategic Plan for Biodiversity 2011–2020. It also contributed to the development of the Global Biodiversity Outlook report and the review of the fulfilment of the EU Biodiversity Strategy for 2020. The report covers the state and tendencies of biodiversity and detected threats, reporting on actions taken towards fulfilling the Aichi Biodiversity Targets and finally sets out, based on experience, topics most deserving of attention

	<p>in order to achieve a more adequate and broad-reaching implementation of the CBD’s COP (Conference of Parties) decisions in Portugal.</p> <p>The vertebrate species identified as threatened are listed and described in the Redbook of Vertebrates from Portugal. Similar assessment has been done for Bryophytes in the Redbook of Bryophytes. A study aimed to identified and list the threatened flora is being develop at this moment.</p> <p>HCV 4 – Low risk</p> <p>In Portugal there are several instruments related to the conservation of river basins, soil conservation, and protection against the risk of fire.</p> <p>In the case of river basins, information relating to the classification of flood plains, areas threatened by floods and other relevant information can be partially obtained by consulting areas included in the REN. River basin plans also contain information that may be relevant, as do PROFs, especially where they refer to protection forests.</p> <p>For information about erosion control it is essential to consult documentation relevant to the risk of erosion. Some of this information is contained in the REN, which identifies, on a scale of 1:25.000, areas at high risk of erosion, as well as zones of instability. Areas of high fire risk are identified in fire risk maps (ICNF) and in municipal forest fire plans.</p> <p>Within the national context, the structure of property, being extremely fragmented, reduces the dependence on ecosystem services and means this is not critical. Furthermore, the probability of forest management activities having a significant impact on the same service is negligible. Several legal instruments safeguard the functions of protection and regulate intervention in these areas. Examples of this are the Water Law [11], river basin plans (PBH) [12], public waters and dams planning (POAAP) [13], National Ecological Network [14], the Land law [15], etc.</p> <p>Not applicable, as no HCV4 is considered to exist at this scale.</p> <p>HCV 5 – Low risk</p> <p>Not applicable to Portugal.</p> <p>In Portugal, the use and enjoyment of common forest land is regulated (Law dos Baldios [common land law] – Decree-Law no. 165/2015, 17 August). At the present, this land is not indispensable to provide for the basic needs of the adjacent communities.</p> <p>HCV 6 – Low risk</p> <p>The criteria for identifying HCV 6 for Portugal are based on international or legal frameworks that already foresee the safeguards needed to protect/maintain the cultural values identified. At the same time, it is considered that the values are legally recognized and enforced.</p>
<p>Means of Verification</p>	<p>FSC or PEFC Forest management certificate public reports</p> <p>Forest Management plan as PGF, PUB, PEIF</p> <p>Game management plans</p> <p>Regional Forest Plans</p> <p>Forest Best Management Practices</p> <p>Forest Operating Procedures</p> <p>Records of BPs’ field inspections</p> <p>Monitoring records</p> <p>Interviews with staff</p> <p>Publicly available information on the protection of the values identified</p> <p>Regional, publicly available data from credible third parties</p>
<p>Evidence</p>	<p>[1] CBD Fifth National Report – Portugal, 2015, pages https://www.cbd.int/doc/world/pt/pt-nr-05-pt.pdf</p>

Review wed	<p>[2] Decree-law nº 96/2013 https://dre.pt/application/file/a/497960</p> <p>[3] Forest Producers Organizations: http://www.icnf.pt/portal/florestas/gf/opf/resource/doc/dcnf-c-list</p> <p>[4] Decree-law nº 151-B, October 31st http://www.icnf.pt/portal/icnf/legisl/legislacao/2013/Decree-law-n-o-151-b-2013-de-31-de-outubro-d-r-n-o-211-serie-i-2-o-suplemento</p> <p>[5] Regional Forest Planning (PROF) http://www.icnf.pt/portal/florestas/profs</p> <p>[6] Controlled Wood National Risk Assessment, 1st Draft, developed according to procedure FSC-PRO-60-002 V 3-0, 2016/10/13, https://ic.fsc.org/en/document-center/id/144</p> <p>[7] Decree-Law 242/2015 of 15 October, https://dre.pt/application/conteudo/70693924</p> <p>[8] Livro Vermelho dos Vertebrados, 2015, ICNF, http://www.icnf.pt/portal/naturaclas/patrinatur/lvv</p> <p>[9] Manual das Linhas Eléctricas, 2010, ICNB, http://www.icnf.pt/portal/naturaclas/ordgest/aa/resource/doc/doc_orient_linhaselectric_jul10_2</p> <p>[10] FSC Principles and Criteria for Forest Stewardship, 2015, https://ic.fsc.org/en/document-center/id/59</p> <p>[11] Natura 2000 sectorial Plan http://www.icnf.pt/portal/naturaclas/rn2000/p-set</p> <p>[12] Water Law Framework http://www.apambiente.pt/index.php?ref=16&subref=7&sub2ref=15&sub3ref=93#LawdaAgua</p> <p>[13] River basins plans framework https://www.apambiente.pt/?ref=16&subref=7&sub2ref=9&sub3ref=834</p> <p>[14] Public waters and dams planning https://www.apambiente.pt/index.php?ref=16&subref=7&sub2ref=10&sub3ref=96</p> <p>[15] National Ecological Network North http://www.ccdr-n.pt/servicos/ordenamento-territorio/reserva-ecologica-nacional Centre http://www.ccdr.pt/index.php?option=com_content&view=article&id=2926&Itemid=191 Lisbon and Tejo Valley http://www.ccdr-lvt.pt/pt/reserva-ecologica-nacional-ren/8395.htm Alentejo http://webb.ccdr-a.gov.pt/index.php/ord/ren Algarve https://www.ccdr-alg.pt/site/info/reserva-ecologica-nacional-ren</p> <p>[16] Land Law framework http://www.dgterritorio.pt/ordenamento_e_cidades/projetos_em_curso/reforma_do_quadro_legal_ot_u/Law_de_bases_da_politica_de_solos_de_ot___urbanismo/apresentacao/</p> <p>Further documents reviewed: http://cdr.eionet.europa.eu/Converters/run_conversion?file=pt/eu/art17/envuc2hfw/PT_habitats_reports.xml&conv=350&source=remote#92B0 Law for natural values cadastre: Decree-Law n.º 242/2015 at 15/10 https://dre.pt/application/conteudo/70693924 Bugalho, M. 2011 “Interpretação Nacional das Florestas de Alto Valor de Conservação” Documento de base Trabalhos realizados pelo GT IN FAVC do FSC Portugal HABEAS: http://www.habeas-med.org/webgis/pt_en/ LEAF_EPICWebGiSPortugal: http://epic-webgisportugal.isa.ulisboa.pt/maps/epic?format=image/png;%20mode=8bit&startExtent=-1523000,4400000,-143668,5180000 SNAC : Legislation https://dre.pt/application/file/70698029 RNAP: http://www.icnf.pt/portal/ap/ap Reed Natura 2000: http://www.icnf.pt/portal/naturaclas/rn2000 Important Bird Areas of Portugal at: http://ibas-terrestres.spea.pt/ Site characterization SIC e ZPE: http://www.icnf.pt/portal/naturaclas/rn2000/p-set/Plan-setdocs Cartography: http://www.icnf.pt/portal/naturaclas/cart Protected area plans (POAP): http://www.icnf.pt/portal/naturaclas/ordgest/poap</p>
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	<p>Data Base for fauna and flora specific plans: http://www.icnf.pt/portal/naturaclas/patrinatur/especies Red book for Portuguese Vertebrates (2005): http://www.icnf.pt/portal/naturaclas/patrinatur/lvv Nesting and wintering Bird Atlas on Portugal (2008): ND online Cartography (2015) http://webgis.spea.pt/AtlasAvesInvernantesMigradoras/ Reptile and amphibious of Portugal (2008): http://www.icnf.pt/portal/naturaclas/patrinatur/atlas-anfi-rept/anfibios Fresh water Fish National cartography :http://www.cartapiscicola.org/# Flora identification: http://www.icnf.pt/portal/naturaclas/rn2000/p-set/psrn-flora Flora cartographic source: http://www.flora-on.pt/ National Conservation Plano of threatened Flora information http://www.icnf.pt/portal/naturaclas/patrinatur/conserv-flora-perigo http://naturdata.com/index.php?option=com_content&view=article&id=78&Itemid=60 Electric wire line manual (ICNB 2008) http://www.icnf.pt/portal/naturaclas/ordgest/aa/resource/doc/man-infra-lin Regional Forest Plans (PROF): http://www.icnf.pt/portal/florestas/profs AIIF :http://www.aiff.org.pt/assets/ESTUDO_Prospetivo_-_Sector-Florestal.pdf AIIF: http://www.aiff.org.pt/assets/Relatorio-de-Characterizacao-da-FiLawra-Florestal-2014-160pCAPA-3-spread....pdf ICNF: http://www.icnf.pt/portal/florestas/ifn/resource/ficheiros/ifn/ifn6-res-prelimv1-1 Planos de Gestão Florestal de areas públicas: http://www.icnf.pt/portal/florestas/gf/pgf/publicitacoes/encerradas Autoridade Florestal Nacional, 2010, Florestat – Aplicação para a Consulta dos Resultados do 5º Inventário Florestal Nacional. Disponível em http://www.icnf.pt/portal/florestas/ifn/ifn5/florestat Reserva Ecológica Nacional https://dre.pt/application/dir/pdf1sdip/2012/11/21200/0630806346.pdf Sistema Nacional de Defesa da Floresta Contra Incêndios: https://dre.pt/application/dir/pdf1sdip/2006/06/123A00/45864599.pdf PANCD https://dre.pt/application/file/65985917 PDR2020 http://www.pdr-2020.pt/site/O-PDR2020/Arquitetura/Area-3-Ambiente-Eficiencia-noUso-dos-Recursos-e-Clima/Medida-7-Agricultura-e-Recursos-Naturais/Acao-7.11-Investimentos-nao-produtivos/Operacao-7.11.1-Investimentos-nao-produtivos Fundo Florestal Permanente: http://www.icnf.pt/portal/icnf/noticias/gloablnews/fundoflorestal-permanente-ffp Alves, A. M., Pereira, J. S., Correia, A. V., 2012. Silvicultura - A gestão dos ecossistemas florestais, Fundação Calouste Gulbenkian. ICNF http://www.icnf.pt/portal/florestas/aip/aip-monum-pt DRE: http://www.icnf.pt/portal/icnf/legisl/legislacao/2012/Law-n.o-53-2012-de-5-de-setembro.-d.-r.-n.o-172-serie-i</p>
Risk Rating	<p> <input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA </p>

	Indicator
2.1.3	Feedstock is not sourced from forests converted to production plantation forest or non-forest lands after January 2008.
Finding	<p>Portugal's forest is marked by its recent origins and by heavy human intervention. In a general way, the Portuguese forest is recent. In Europe, Portugal is the country in which the transition from deforestation to reforestation occurred most rapidly: forest cover, which was between 4 and 7 per cent in 1870, grew in one century to cover more than 30 per cent of the continental territory. [1]</p> <p>The definition of natural forest, as defined in the FSC forest management standard for Portugal (approved by FSC on 18 February 2016) is: forest areas where many of the principal characteristics and key elements of native ecosystems such as complexity, structure, soil properties, and biodiversity are present, and where all or most of the trees are indigenous species. Natural forests can include forest areas where forestry or other intervention is characterized by a combination of natural regeneration and artificial regeneration, composed of local indigenous species and in which many of the characteristics of natural forests are present. Natural forests do not include:</p> <ul style="list-style-type: none"> i. Areas where the vegetation is not dominated by trees; ii. Areas that were not previously forested; iii. Areas that do not yet contain many of the characteristics and elements of native ecosystems. <p>Hence, the majority of the present forest cover have developed from afforestation activities of Pinus Pinaster and Eucalyptus Globulus. Thereby, forest areas considered as primary forest, as is published by FAO, account for around 0.8% of overall forest cover.</p> <p>Furthermore, the overall dynamics of the Portuguese forest cover is not promoted or supported by the demand of biomass. Simultaneously, the development of forest energy crops is not permitted in Portugal, through several legislation limitations, namely the mandatory previous authorization for premature final cut of eucalyptus stands (Law-decree nº173/88 from May 17th), regulations for the introduction and environmental control of non-indigenous species (Law-decree nº565/99 from December 21st) and mainly the mandatory previous authorization for afforestation and reforestation activities using short rotation crops (Law-decree nº175/88 from May 17th).</p> <p>We can also conclude that the remains of the forest ecosystems that would have survived this destruction will be concentrated in the Fundamental Nature Conservation Network (RFCN) (defined by Decree-Law no. 142/2008, amended by Decree-Law no. 242/2015 dated 15 October) and made up of the Sistema Nacional de Áreas Classificadas [National Classified Areas System], which incorporates the central areas of nature conservation and biodiversity: i) RNAP; ii) SICs and ZPEs of the Natura2000 network; iii) any other areas classified under the umbrella of international commitments agreed upon by the Portuguese state; and areas of continuity: i) REN; ii) RAN iii) DPH (public hydric domains), safeguarded by the respective legal regulations.</p> <p>FAO's Global Forest Resources Assessment of 2010 [2] shows the following data regarding Portuguese forest area:</p> <ul style="list-style-type: none"> 37% of areas are defined as permanent forest 20% of the forest is within protected areas

Primary forest only represents 1%
 Other naturally regenerated forest just 75%
 Planted forest 25%

Altering land cover in the protected areas is prohibited by Article 43 of Decree-Law no. 242/2015, as is the disturbance or destruction of threatened species and their habitats, under Article 44.

As far as conversion to forest plantations is concerned, the provisions of Decree-Law no. 96/2013, 19 July, apply to the whole of the continental territory. This establishes the legal framework, for the whole of the continental territory, to which actions of afforestation and reforestation of forest species (RJAAR) are subject. However, any planting/replanting of forest species, independently of the area of intervention, that alters the dominant species previously installed (including the conversion of natural forest to plantations) is subject to advance authorization by the ICNF.

It's important to highlight that the article nº9 of RJAAR defines that if an intervention area is situated inside the National Ecologic Reserve, a consult must be addressed to the CCDR as well as the related municipality. The article nº10 defines the factors that should be taken into account in the decision making process including protection of forest against forest fires, hydric related issues, biodiversity and habitat protection, among others.

There are 135 Forest Producers Organizations registered on ICNF data base [3], whose offer multiple services, such as the preparation and implementation of Forest Management Plan, creation and management of Forest Intervention Zones, promotion of forest best practices, management of forest intervention teams, among others.

As far as conversion that is not for agriculture or forestry is concerned, Decree-Law no. 139/89 is applicable to all Portuguese territory, and establishes protection measures for natural landscape, arable soil, and plant cover. These actions are subject to prior licensing by the municipal council.

There is also specific protection legislation for:

- Cork and holm oak (D-L no. 169/2001, amended by D-L no. 155/2004 of 30 June);
- Riparian vegetation (Law 58/2005 and Law 54/2005);
- Holly (Decree-Law no. 423/89).

The latest RJAAR informative application note [3] summarizes the main points in this legal regime, including that actions of afforestation and reforestation are to be authorized by the ICNF, approved for public funding support programmes, decided upon by environmental impact reviews or environmental incidence assessments, and authorized or carried out by the ICNF, in properties managed by the same.

15% of the reforestation activities comprising the change of species, in the period of assessment, consisted on Pinus Pinaster converted to Eucalyptus. 4% of the referenced activities comprise the plantation of Eucalyptus on areas occupied by other, non-specified, species.

Tipo de rearborizações		Autorizações (ha)	Comunicações (ha)	Total	
				(ha)	%
Sem alteração de espécie	eucalipto-comum	19.493	3.590	23.083	62
	pinheiro-bravo	379	118	497	1
	outras	1.101	231	1.332	4
Com alteração de espécie*	pinheiro-bravo em eucalipto-comum	5.476	270	5.746	15
	outras espécies em eucalipto-comum	1.264	222	1.486	4
	pinheiro-bravo em outras espécies	1.745	212	1.957	5
	eucalipto-comum em outras espécies	2.383	298	2.681	7
	outras	286	27	313	1
TOTAL		32.128	4.968	37.095	100

Image 3 Afforestation and Reforestation actions authorized or validated by ICNF from October 2013 to December 2016 [source: [ICNF](#)]

This informative note also demonstrates that this law is being actively applied, with 1,055 civil proceedings since 2013, mostly concerning the obligation to put recovery programmes in place, to reconstitute legal and technical compliance with plantations, and to define interventions, which are subject to prior authorization by the ICNF.

The [Minister Council from March 21st 2017](#), approved a law proposal that reviews the Legal Regime of the Arborization and Reforestation Actions [RJAAR] blocking the expansion of the eucalyptus plantation area, allowing new plantations only as compensation for areas previously occupied by eucalyptus and currently abandoned, being mandatory that the areas of previously occupied by this species shall be cleaned and in condition to be used for another agricultural or forestry activity.

- Conversion of forest cover is possible in Portugal, although previous authorization by ICNF is mandatory.
- Several legal mechanisms and monitoring practices are put in place in order to control forestry activities in sensitive areas, comprising protected tree species.
- The exotic tree species most relevant in Portugal is the Eucalyptus Globulus as is described above. The area of Eucalyptus settlements is constrained and thereby, conversions from other species will not be possible.
- The change of land use is limited.

The future conversions of forests to plantations will be very limited to non-existing due to the tighter law framework revision. Hence, the risk of raw material coming from areas that will be converted to plantations is low. Regarding raw material (mainly eucalyptus) coming from conversions done after 2008 until 2017, the risk is changed to specified since the law allowed this actions, if approved by ICNF.

Means of Verification	Historical maps and enquiries with stakeholders Regional, publicly available data from a credible third party Records of BPs' field inspections Monitoring records Aerial photos
Evidence Reviewed	[1] Pereira, João et al. (2009). Floresta. In: Pereira, H. M., Domingos, T., Proença, V., Vicente, L. & Rodrigues, P. (eds.) Ecosistemas e Bem-Estar Humano. Avaliação para Portugal do Millennium Ecosystem Assessment [Ecosystems and human well-being. Evaluation of the Millennium Ecosystem Assessment for Portugal] [2] Global Forest Resources Assessment 2010, FAO, Rome, 2010

	<p>[3] RJAAR Informative note nº4, ICNF http://www.icnf.pt/portal/florestas/arboriz/resource/docs/not-info/RJAAR-nota-informativa-n4-jan2016.pdf</p> <p>[4] 6.º INVENTÁRIO FLORESTAL NACIONAL Legar Framework for Afforestation and reforestation activities (RJAAR), DL 96/2013, July 19th, http://www.icnf.pt/portal/florestas/arboriz/leg-reg</p> <p>Conversion from natural Quercus suber and Quercus rotundifolia to other land uses: DL 169/2001, de 25/05 Artº 2º https://dre.pt/application/dir/pdf1sdip/2001/05/121A00/30533059.pdf updated by DL155/2004, 30/06 https://dre.pt/application/dir/pdf1sdip/2004/06/152A00/39673968.pdf</p> <p>Conversion inside Protected and Classified areas: DL142/2008 at 24/07 Artº 43º https://dre.pt/application/dir/pdf1sdip/2008/07/14200/0459604611.PDF DL 49/05 24/02 https://dre.pt/application/dir/pdf1sdip/2005/02/039A00/16701708.pdf</p> <p>Destruction of natural riparian vegetation: Law 58/2005 29/12; Law 54/2005,at 15/11 (Artº 25º) https://dre.pt/application/dir/pdf1sdip/2005/11/219A00/65206525.pdf</p> <p>Conversion from natural Ilex aquifolium DL 423/89, 4/12 (Artº 1) https://dre.pt/application/dir/pdf1sdip/1989/12/27800/52915292.pdf</p> <p>Conversion from natural landscapes and hillside/slope erosion: DL 139/89 28/04 artº1 http://www.icnf.pt/portal/icnf/faqs/arbor/dl139-89</p> <p>Conversion by deforestation above 50ha (10ha in Sensitive Areas) or for reforestation with fast growth forest species on areas above 350ha (or 70 ha in sensitive areas) DL 151-B/2013 Artº 1ºhttps://dre.pt/application/dir/pdf1sdip/2013/10/21102/0000600031.pdf</p>
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.2.1	Feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them.
Finding	Portuguese Legal system defines a forest management and planning framework which includes tree levels: I) Regional Forest Plans (PROF) are instruments of sectorial politic for regional level. PROF set general guidelines for intervention, use and forest exploration with the goal to promote and guarantee the sustainable production of every products and services, preserving the objectives of National Forest Strategy (ENF). PROF are binding for administrative authorities, at all levels.

II) Forest Management Plans (PGF) are tool for the management of forest areas at forest unit/exploration level, following the guidelines set by the applicable Regional Forest Plan. PGF set, in time and space, the nature of concrete interventions and exploration of the existing resources in the forest unit, aiming to the sustainable production of products and services, considering the activities and uses of the surrounding areas, as well as the existing restrictions of legal and binding character.

III) Specific Plans for Forest Intervention (PEIF) are instruments that produce specific measures for the intervention on forest areas with major biotic problems (e.g.: invasive species, plagues or diseases) or abiotic (e.g.: high risk of forest fire).

A PGF is mandatory for all public forests. Every community forest area (in Portuguese bibliography, baldios) must have an approved PGF (or PUB – Community areas use Plan), independently on their dimension. PGF and PUB are prepared by the public administration organism responsible for the management of the public forest unit and it's approved by the national authority for the conservation of nature, ICNF.

PGF are mandatory for private forest areas when:

- a) minimum area conditions set in the applicable PROF are met, whereas 25, 50 or 100ha depending on the areas defined in the region applicable PROF
- b) areas integrated in ZIF (Forest Intervention Zones) in conformity with the dispositions of Decree-law n. 127/2005, from August 5th, in the wording of Decree-laws 15/2009 from January 14th, 2/2011 from January 6th and 27/2014 from February 18th. In this case, the general PGF of the ZIF is adopted or a specific PGF must be prepared.
- c) a public funding is conceded (European, national or other) for the forest management or afforestation. However, this obligation for all projects, was in force until February 2014. From this date on, the requirement described in a) is applicable, whether there is public funding, or not.

On the above cases, PGF are prepared by the entity responsible for the forest management and submitted to ICNF for approval.

When a forest unit overlaps an area defined for nature and biodiversity conservation (Natura 2000 network and Protected Areas, among others), the PGF must include a Biodiversity Management Program (PGB), aimed to ensure the compatibility and contribution of the proposed interventions in the PGF for the conservation of protected species and habitats, whose favourable conservation status depends on the forest management. PGB must consider the applicable dispositions of the PSRN2000 (Sectorial Plan for the Natura 2000 network), as well as other applicable plans and regulations (e.g. Protected Areas management plans and regulations; Territory planning). Support documentation for forest owners and managers is available.

Around 25% of the areas under PGF are encompassed in the National System of Classified Areas – SNAC – which consists in Protected Areas (AP), Natura 2000 network sites, Biosphere Reserves, Ramsar site, among others and, thereby, a Biodiversity Management Plan must be prepared.

When forest owners are not obliged to prepare a PGF, the applicable PROF and PSRN2000 supply general guidance. Additionally, there is applicable national legislation which includes specific operational rules of mandatory character, related to species

protection, soil protection and forest fires prevention. Municipal Planning documents contain mandatory rules that must be observed.

New afforestation activities must be previously communicated or authorized by ICNF and might, as well, fall under the obligation of an Environmental Impact Assessment (AIA), according to Habitats Directive and national legislation.

A guide for the development of forest projects and plans was produced. The objective of this document is to support forest owners, managers and planers on the preparation and implementation of forest projects and operations, aiming to ensure their compatibility with the existing natural values and even contribute for the improvement of their conservation status.

Most environmental legal requirements relating to forestry planning activities are included in Portugal's forestry legislation. In the administrative process of forest planning or forestation projects, the competent entities are centrally consulted by the national forest authority (ICNF).

Management Plans including Forest Intervention Zone (ZIF), Community Use Area Plan (PUB) and Intervention Special Plan (PEIF) have been in place since 2000, and (to 2013) cover about 44% of Portuguese forest area. [\[AIFF\]](#)

In public areas, forest plans are obligatory for all areas (state forest, municipalities, etc.); Numbers from 2012 indicate that only 43% of these forests have the PGF. On National Strategy for Forests revision in 2015, it is an objective of the forest authority ICNF that 100% of its areas should have a PGF by 2017 (for all public areas).

In communitarian forests, plans are obligatory for all areas however 2015 data show that Forest Plans (PUB) are in place in only 60% of cases.

Forest Management Plans should include identification of most part of potential impacts and measures to minimize them. However, it is not a specific tool used to monitor environmental impacts, on FMU Management Plans. Instead there are the Regional Forest Plan covering all country which contains the most part of recommendations and tools to address forest impacts.

In the case of river basins, information relating to the classification of flood plains, areas threatened by floods and other relevant information can be partially obtained by consulting areas included in the National Ecologic Reserve (REN). River basin plans (PGBH) also contain information relevant, as do PROFs, especially where they refer to protection forests.

For information about erosion control it is essential to consult documentation relevant to the risk of erosion. Some of this information is contained in the REN, which identifies, on a scale of 1:25 000, areas at high risk of erosion, as well as zones of instability.

The typical distribution of the Forest private property (Coelho, Inocência) with small property average sizes above the Tagus River, reduces the level of risk coming from forestry activities, since the areas of intervention are typically small.

Risk Conclusion:

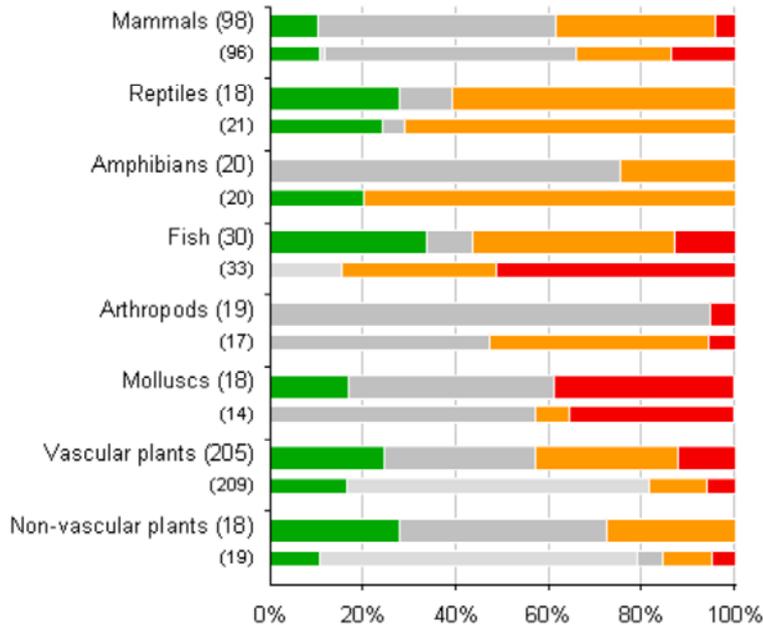
Low risk is assessed for areas with dimensions above the minimum threshold for the obligatory implementation of Forest Management Plan (see PROF), areas where PGF is

	Indicator
2.2.2	Feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b).
Finding	<p>National Forest Strategy (2015) [4] states (chapter 2.2.5): “The susceptibility to desertification, which in terms of the Convention is defined by the aridity index threshold and, in particular in Portugal, corresponds to the 'Semi-arid' and 'dry sub-humid' classes, covers 58% of the continent in the last three decades (1980/2010) and 63% in the last decade (2000/2010). More than 60% of the national forest area estimated by IFN6 is included in areas susceptible to desertification including 100% of holm oak area, 99% of the area of cork oak, 98% of pinus pinea and 100% of the carob tree. It should also be noted that in the last decade there has been a significantly positive trend on the recovery of the productive capacity of Portuguese soils – in 22% of the mainland area– thus a regression in the desertification trends, including, in this scope, 5% of degraded areas, 9% of areas under production and 6% of naturalized areas, on a large extent related to new afforestation, since more than 90% of new afforestation interventions were carried out in areas susceptible to desertification (data from IFN5).</p> <p>ICNF report “Forest adaptation to climate change” [5] states the following on page 57: “Technical studies for the assessment and monitoring of the soil status that have been developed as a support for the revision of the PANCD (National Action Plan Against Desertification), show that 28% of the areas susceptible to desertification are degraded. Nevertheless, monitoring of the soil conditions over the period 2000-2010 shown a positive evolution of soil status on susceptible areas, since 22% recovered its primary productivity and only 1.1% presented a negative trend.”</p> <p>Madeira, M., in its study [6], based on 30 years of monitoring, sampling and analysing activities that "forest residues could be used in production energy, since the site (soil) presents sufficient resilience to nutrient removal...". In the other two referenced studies [7][8], direct relationship between biomass removal and degradation of soil quality is not achieved. Both authors put it as a hypothesis, lacking a longer term assessment, as Madeira, M. did as a result of its 30 years study.</p> <p>Law nº 31/2014 [1], May, 30th defines the general basis for the public policy on soils, territory planning and urbanism and sets a goal of enhancing the potential of agricultural, forestry and forestry areas, among other broader objectives. It sets, as objective of territory planning:</p> <p>“The preservation of soils with potential for agriculture, livestock or forestry, nature conservation, tourism and leisure, the production of renewable energies or the exploitation of geological resources in such a way that the allocation of such soils to other uses is restricted to situations where it is effectively needed and is duly proven”</p> <p>Law nº33/96, August 17th – Base Law for Forest Policy determines that the national forestry policy pursues the objective of "... ensuring the fundamental role of forests in regulating <u>water resources</u>, <u>soil conservation</u> and air quality and combating desertification ...".</p>

	<p>Forest Regime [3], established in 1901 also defines “For the sake of the public, the forest regime shall be subordinated not only to lands which must be destined for the creation, exploitation and conservation of silvicultural wealth, from the point of view of the national economy, but also those for which the afforestation is necessary for the good conservation of waters and safeguard of the varzeas, as well as for the valorization of ridges, moorlands and arid plains and benefit of the climate, or for the <u>fixation and conservation of the soil</u>, in the mountains, and the sands, in the maritime coast.”. Under Forest Regime, there are several areas, public and private, that have been subject of interventions in the past century and are still maintained due to their importance regarding the objectives established in the original document. The following link shares a map of these areas: http://www.icnf.pt/portal/florestas/gf/regflo/resource/img/map-mnac-per-flor</p> <p>Holm oak, cork oak and stone pine settlements comprise trees with different ages and sizes which represent a major asset for the control of erosion, mainly in the south region of Portugal. Since these tree species aren’t used primarily for timber production, being even common their continuous maintenance until decay, added to the fact that the areas of stone pine and cork oak are increasing in Portugal, a positive trend to control soil degradation is visible. Interventions in settlements of these species occur on a relatively long time-frame and, therefore, plants play an important role on controlling soil erosion.</p> <p>Considering the information reviewed and the positive trends verified in the latest assessments on soil quality, the risk evaluation for this indicator is assessed as low.</p>
<p>Means of Verification</p>	<p>Best Management Practices; Records of BP’s field inspections; Assessment at an operational level of measures designed to minimise impacts on the values identified Level of enforcement Regional, publicly available data from a credible third party Erosion and desertification programs and maps</p>
<p>Evidence Reviewed</p>	<p>[1] https://dre.pt/application/dir/pdf1sdip/2014/05/10400/0298803003.pdf [2] http://www.bolsanacionaldeterras.pt/docbt/Lei_n62_2012_BolsadeTerras.pdf [3] http://www.icnf.pt/portal/florestas/gf/regflo [4] https://dre.pt/application/file/66432612 [5] Adaptation of forests to climate change, ICNF, 2013 http://www.icnf.pt/portal/florestas/ppf/resource/docs/alt-clima/rel-florest-enaac [6] Madeira, M. (2015) Thirty years of research on soil quality in forest systems under Mediterranean conditions. Trends and future. http://www.repository.utl.pt/bitstream/10400.5/9277/1/REP-M.Madeira Spanish%20j.S.C..pdf [7] Madeira.M , Fabião A., Páscoa F., Magalhães M., Cameira,M , Ribeiro C. (2009) Carbon and nutrient amounts in aboveground biomass, understory and soil in a pine stand chronosequence, http://www.scielo.mec.pt/pdf/rca/v32n2/v32n2a15.pdf [8] Magalhães, M., Cameira M., Pato, Santos R. & Bandeira, J (2011) Residual forest biomass: effects of removal on soil quality http://www.scielo.mec.pt/scielo.php?script=sci_arttext&pid=S0871-018X2011000200019</p>
<p>Risk Rating</p>	<p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>

	Indicator																																								
2.2.3	Key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).																																								
Finding	<p>Most important forest areas with high concentration of nature conservation values have been identified and designated as classified or protected areas at national and/or EU level (Natura 2000 sites) as described in the indicator 2.1.1.</p> <p>National summary for Article 17 of the Habitats Directive (2007-2012) provides the graphs below where it can be seen the conservation status of habitats and species (except birds) within the timeframe of the last Habitats directive reports, 2001 to 2006 and 2007 to 2012. With the following legend:</p> <p>■ FV - Favourable ■ NA - Not reported ■ XX - Unknown ■ U1 - Unfavourable inadequate ■ U2 - Unfavourable bad</p> <p>Habitats</p> <table border="1"> <caption>Conservation status of habitats in biogeographical and marine regions</caption> <thead> <tr> <th>Habitat</th> <th>Assessments</th> <th>2001-2006 (Narrow Bar)</th> <th>2007-2012 (Wide Bar)</th> </tr> </thead> <tbody> <tr> <td>Forests</td> <td>(25)</td> <td>~15% FV, ~5% NA, ~80% U1</td> <td>~15% FV, ~5% NA, ~75% U1, ~5% U2</td> </tr> <tr> <td>Rocky habitats</td> <td>(15)</td> <td>~55% FV, ~10% NA, ~35% U1</td> <td>~65% FV, ~10% NA, ~15% U1, ~10% U2</td> </tr> <tr> <td>Bogs, mires & fens</td> <td>(8)</td> <td>~15% FV, ~45% U1, ~40% U2</td> <td>~15% FV, ~45% U1, ~40% U2</td> </tr> <tr> <td>Grasslands</td> <td>(16)</td> <td>~25% FV, ~10% NA, ~65% U1</td> <td>~25% FV, ~10% NA, ~65% U1</td> </tr> <tr> <td>Sclerophyllous scrubs</td> <td>(10)</td> <td>~40% FV, ~60% U1</td> <td>~40% FV, ~60% U1</td> </tr> <tr> <td>Heath & scrub</td> <td>(10)</td> <td>~50% FV, ~50% U1</td> <td>~50% FV, ~50% U1</td> </tr> <tr> <td>Freshwater habitats</td> <td>(20)</td> <td>~40% FV, ~10% NA, ~50% U1, ~10% U2</td> <td>~40% FV, ~10% NA, ~45% U1, ~5% U2</td> </tr> <tr> <td>Dunes habitats</td> <td>(20)</td> <td>~80% U1, ~20% U2</td> <td>~80% U1, ~20% U2</td> </tr> <tr> <td>Coastal habitats</td> <td>(32)</td> <td>~25% FV, ~10% NA, ~65% U1, ~10% U2</td> <td>~25% FV, ~10% NA, ~65% U1, ~10% U2</td> </tr> </tbody> </table> <p>Note: wide bar corresponds to the 2007-2012 reporting period, and the narrow bar to the 2001-2006 reporting period. The number in brackets corresponds to the number of biogeographical assessments in the category.</p>	Habitat	Assessments	2001-2006 (Narrow Bar)	2007-2012 (Wide Bar)	Forests	(25)	~15% FV, ~5% NA, ~80% U1	~15% FV, ~5% NA, ~75% U1, ~5% U2	Rocky habitats	(15)	~55% FV, ~10% NA, ~35% U1	~65% FV, ~10% NA, ~15% U1, ~10% U2	Bogs, mires & fens	(8)	~15% FV, ~45% U1, ~40% U2	~15% FV, ~45% U1, ~40% U2	Grasslands	(16)	~25% FV, ~10% NA, ~65% U1	~25% FV, ~10% NA, ~65% U1	Sclerophyllous scrubs	(10)	~40% FV, ~60% U1	~40% FV, ~60% U1	Heath & scrub	(10)	~50% FV, ~50% U1	~50% FV, ~50% U1	Freshwater habitats	(20)	~40% FV, ~10% NA, ~50% U1, ~10% U2	~40% FV, ~10% NA, ~45% U1, ~5% U2	Dunes habitats	(20)	~80% U1, ~20% U2	~80% U1, ~20% U2	Coastal habitats	(32)	~25% FV, ~10% NA, ~65% U1, ~10% U2	~25% FV, ~10% NA, ~65% U1, ~10% U2
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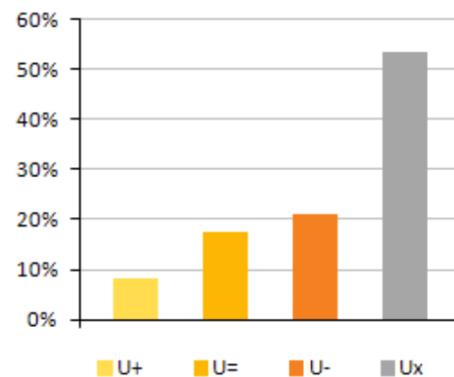
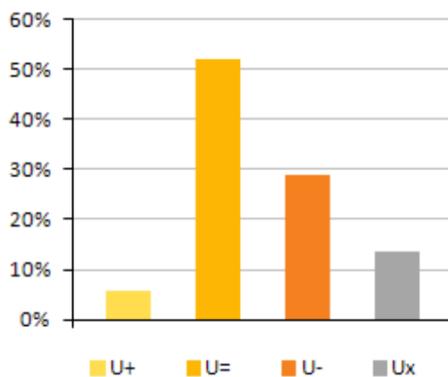
Species



Conservation status of **species** in biogeographical and marine regions

Note: wide bar corresponds to the 2007-2012 reporting period, and the narrow bar to the 2001-2006 reporting period. The number in brackets corresponds to the number of biogeographical assessments in the category.

The overall conservation status of the habitats assessed hasn't change significantly has can be seen in the next graph which demonstrates the trends of conservation status:



Habitats – overall trend in Conservation Status

Species – overall trend in Conservation Status

U (+) = unfavourable (inadequate and bad) improving, U (=) = unfavourable stable, U (-) = unfavourable declining, U (x) = unfavourable unknown trend

Regarding monitoring programs and systematic monitoring of species, the implementation reports of the Birds and Habitats Directives require periodic assessment of the conservation status of many relevant species and habitats. The Planning and Management Plans of the Protected Areas and Classified Areas of the Natura2000 network may also integrate a monitoring program for a periodic evaluation of the implementation of the proposed measures and actions. In addition, Environmental Impact Assessment processes involve the monitoring of key environmental descriptors (namely, fauna, flora and vegetation) potentially affected by project implementation.

No key biodiversity indicators have been identified, but a number of monitoring programs have been implemented for certain species as representatives of a given taxonomic group

that may integrate the set of indicators of progress achieved towards a significant reduction in the rate of biodiversity loss.

ICNF coordinates several long term monitoring programs addressed to several species and group of birds:

- National program for monitoring of winter waterfowl, for species highly dependent on wetlands. This program is in force since 1976. This project comprises the annual assessment of the population and distribution of Anseriformes and Gruiformes species. [2]
- Stations of constant effort project. Has the objective of monitoring the population alterations of Passeriformes e quasi-Passeriformes species with wide distribution. [3]

Specific monitoring actions at regional level:

- Monitoring scheme of rupicolous birds (Gyps fulvus, Neophron percnopterus, Hieraaetus fasciatus, Aquila chrysaetos, Ciconia nigra, Bubo bubo, Oenanthe leucura) nesting species of the Serra de S. Mamede Natural Park;
- Annual monitoring scheme for birds of prey in the Lagoa de Santo André and Sancha Natural Reserve;
- Monitoring scheme of Glareola pratincola and Sterna albifrons nesting in the Tagus Estuary Natural Reserve;
- Monitoring scheme of Larus audouinii nesting in the Reserva Natural de Sapal de Castro Marim and Vila Real de Santo António;
- Monitoring scheme of Hieraaetus fasciatus, Falco peregrinus, Apus melba, Phalacrocorax aristotelis and Accipiter nisus in the Sintra-Cascais Natural Park;
- Scheme for the monitoring of rockhoppers (Gyps fulvus, Neophron percnopterus, Hieraaetus fasciatus, Aquila chrysaetos, Ciconia nigra, Falco peregrinus) Douro International Natural Park;
- Monitoring scheme of nesting Hieraaetus fasciatus in ZPE Vale do Guadiana and Castro Verde and adjacent areas;
- Monitoring scheme of nesting Ciconia nigra in ZPE Vale do Guadiana;
- Autumn and spring counts of Pterocles orientalis in the Vale do Guadiana and Castro Verde EPZs;
- Monitoring scheme of nesting Falco peregrinus in ZPE Costa Sudoeste;
- Grus wintering monitoring scheme in the Vale do Guadiana and Castro Verde EPZs and adjacent areas;
- Monitoring scheme of Larus michahellis, Phalacrocorax aristotelis and Uria aalge in ZPE Berlengas Islands;
- Scheme for the monitoring of seabirds in the Natural Reserve of the Lagoons of Santo André and Sancha.

At the national level, other monitoring projects have been carried out since 2010, oriented to different taxonomic groups:

- [Action Plan for the Conservation of Iberian Lynx](#)

The Action Plan defines strategies for action, and its ultimate goal is to enable the conservation of the species in the national territory, reversing the process of continued decline of populations and recovering the nuclei of the species.

In addition, it establishes a strategic model for the implementation of the breeding program in captivity, the recovery and maintenance of the favorable habitat, and the reintroduction of specimens of the species in suitable territories. Among other aspects, it emphasizes the

	<p>importance of agricultural, forestry and game management to create the right conditions so that this essential objective can be successfully achieved.</p> <p>The Action Plan results from the directives of action of the National Strategy for the Conservation of Nature and Biodiversity and is the result of a long process of preparation that included a procedure of public auscultation.</p> <ul style="list-style-type: none"> • Monitoring program for cave species of bats in progress since 1987. <p>Annually, the most important winter and maternity shelters are visited at the national level, and an annual estimate is made of the actual numbers present. A recent analysis of data collected between 1988 and 2012 includes population trends of seven species calculated using TRIM software. [4]</p> <p>The use of updated criteria to evaluate shelters of national importance that there are currently 76 major shelters (3 important ones throughout the year, 43 hibernacula and 40 maternities). [5]</p> <ul style="list-style-type: none"> • CAC (Censo de Aves Comuns), a long-term monitoring program for common birds and their habitats in Portugal. Launched by the Portuguese Wild Bird Society (SPEA) in 2004, in mainland Portugal and Madeira, and in 2007 in the Azores. It is integrated into the Pan-European Common Bird Monitoring Scheme (PECBMS). [6] This census received public support in 2009 and 2010. It continues to be carried out annually but lacks funding, namely for processing and analysis of data, reporting of results and support to the network of volunteers, which has made unfeasible the provision of Common Bird Indexes (IACZA, IACZF, etc.) to the public administration. These indexes are published until 2009. After 2009, only CAC reports are available, which only contain information disaggregated by species; [7] • CANAN (Bird counts at Christmas and New Year), monitoring of population trends of wintering bird species in Portugal's agricultural fields; [8] • NOCTUA-Portugal, monitoring of nocturnal birds; [9] • RAM, network of observation of birds and marine mammals; [10] • Project Arenaria, monitoring the distribution and abundance of birds on the beaches and coasts of Portugal; • Monitoring scheme of the bustard (<i>Otis tarda</i>); • Monitoring scheme of the imperial eagle (<i>Aquila adalberti</i>). • Monitoring the mortality of vertebrates by trampling on roads in Portugal. <p>Since 2010, a joint project of the University of Lisbon and Estradas de Portugal, S.A., with the objective of minimizing road mortality and improving the permeability of routes through the identification of points of high mortality and improvement of the hydraulic passages to the animal passage;</p> <p>As a contribution to the establishment of a reference framework for species, the most important are the Portuguese Atlas of Bats, the Winter Migratory Birds, the Atlas of Nesting Birds in the Madeira Archipelago, the Atlas of Birds (In prep.) And the 6th volume of the Madeira Biodiversity collection: Evaluation and Conservation of the native terrestrial vertebrates of the Madeira and Selvagens Archipelagos - Reptiles and Mammals. The project of the Atlas of Bats of Portugal (continent), which involved about 150 volunteers, had as main objectives to map the current distribution of the 25 species of bats with known occurrence in mainland Portugal, to fill a base of data to make this information available to stakeholders and, together with the 2011-2012 Year of the Bat campaign, mobilize and encourage practitioners in this area to educate the public about the importance of bats in ecosystems.</p>
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	<p>Reference should be made to the development of the Biodiversity Information and Monitoring of north of Portugal (SIMBioN), developed by the ICNB, IP, and by CIBIO, which had, among its objectives, to provide the ICNB, IP with a tool to support biodiversity management and contribute to scientific knowledge and public dissemination of biodiversity.</p> <p>It is important to highlight that, as stated before on indicators 2.1.1 and 2.1.2, forest operations are identified in the CBD Fifth National Report [1] from Portugal to present threat (present) in 6 habitats and pressure (future) on 8 habits accounting for 3.8% and 5%, respectively, of the total assessments. A similar assessment was performed, having species as the scope and the numbers don't differ. Forestry presents threat to 7.7% of the species assessed and puts pressure on 9.6% of the total 426 species considered. To put it into perspective, agriculture shown threat for 13.5% of habitats and 12% of species.</p> <p>The forestry sector shown to have a relatively low impact on habitats and species conservation, has it is shown above and on indicator 2.1.1 and 2.1.2. Certainly, there are some examples where the forestry activities present threat or potential pressure to a habitat or specie, nevertheless, when compared to other activities, the impact is typically minor due to the reduce number of the occurrences. Nevertheless the overall trends of the conservation status of species and habitats imposes this risk to be assessed as <u>specified</u>.</p>
<p>Means of Verification</p>	<p>Best Management Practices Supply contracts Assessment of potential impacts at operational level and of measures to minimise impacts Monitoring results Publicly available information on the protection of the identified values Regional, publicly available data from a credible third party</p>
<p>Evidence Reviewed</p>	<p>[1] CBD Fifth National Report – Portugal, 2015 https://www.cbd.int/doc/world/pt/pt-nr-05-pt.pdf [2] http://www.icnf.pt/portal/naturaclas/ei/cempa/pp-monit/pnmaai [3] http://www.icnf.pt/portal/naturaclas/ei/projeto-de-estacoes-de-esforco-constante http://www.apaa.pt/peec/index.html [4] http://www.icnf.pt/portal/naturaclas/patrinatur/especies/mam/morc http://www.icnf.pt/portal/naturaclas/patrinatur/resource/docs/Mam/morc/prog-abri-sub1988-2012v3 [5] http://www.icnf.pt/portal/naturaclas/patrinatur/resource/docs/Mam/morc/morc-crit-aval-abrig [6] http://www.spea.pt/pt/estudo-e-conservacao/censos/censo-de-aves-comuns/ [7] http://www.spea.pt/fotos/editor2/relatoriocac_2011.pdf [8] http://www.spea.pt/pt/estudo-e-conservacao/censos/canan/ [9] http://www.spea.pt/pt/participar/grupos-de-trabalho/aves-noturnas/monitorizacao/ [10] http://www.spea.pt/pt/estudo-e-conservacao/censos/dias-ram/ INCF Birds Directive (2008-2012) article 12 PT Summary http://www.icnf.pt/portal/pn/biodiversidade/rn2000/dir-ave-habit/resource/doc/National_Summary_for_Article%2012%20%20PT.pdf</p>
<p>Risk Rating</p>	<p><input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>

	Indicator
2.2.4	Biodiversity is protected (CPET S5b).
Finding	Based on the evidences presented on indicators 2.1.1, 2.1.2 and 2.2.3 it is possible to conclude that forestry activities and feedstock supply represent specified risk for biodiversity attributes in Portugal.
Means of Verification	Best Management Practices Supply contracts Assessment of potential impacts at operational level and of measures to minimise impacts Monitoring results Publicly available information on the protection of the identified values Regional, publicly available data from a credible third party
Evidence Reviewed	Evidences of described in the 2.1.1, 2.1.2 and 2.2.3.
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.2.5	The process of residue removal minimises harm to ecosystems.
Finding	Adding to the findings of indicator 2.2.2 on soil quality. In Portugal forest residues removal from forests is regulated so loggers and owners have some legal obligations, related with both fire and phytosanitary policies. These obligations are depending on species, areas, seasons and regions. Depending on silvicultural procedures and forest models, the solutions adopted about forest residues are a) integrating them on soil; b) remove them or c) burn them in appropriated season. All of these operations include advantages and disadvantages according to the focus of the overview. In the case of removal, it is always considered the harm to the remaining forest, soil, fauna and flora. Process of forest residue removal is commonly included on Best Practices but also on wood supply contracts, and forest land leasing. Based on the available information this indicator is considered low risk
Means of Verification	Best Management Practices; Records of BP's field inspections; Assessment at an operational level of measures designed to minimise impacts on the values identified Level of enforcement of legal framework
Evidence Reviewed	National System for Forest Fire Prevention: https://dre.pt/application/dir/pdf1sdip/2006/06/123A00/45864599.pdf Good Forest Practices

	<p>http://www.icnf.pt/portal/florestas/gf/documentostecnicos/resource/doc/Boas-Praticas-Florestais.pdf</p> <p>Pinus Wilt Disease:</p> <ul style="list-style-type: none"> •Dec.Retif. n.º 38/2015 de 01/09 •DL 123/15, at 3/07 •DL 95/2011, de 8/08 •DL 154/05 6/09 •Dec. n. 30-A/2011, de 7/10
<p>Risk Rating</p>	<p> <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA </p>

	Indicator
2.2.6	Negative impacts on ground water, surface water and water downstream from forest management are minimised (CPET S5b).
Finding	<p>Forest resources have a positive impact on water resources, compared with other land uses, such as agriculture.</p> <p>In the case of river basins, information relating to the classification of flood plains, areas threatened by floods and other relevant information can be partially obtained by consulting areas included in the National Ecologic Reserve (REN). River basin plans (PGBH) also contain information relevant, as do PROFs, especially where they refer to protection forests.</p> <p>For information about erosion control it is essential to consult documentation relevant to the risk of erosion. Some of this information is contained in the REN, which identifies, on a scale of 1:25.000, areas at high risk of erosion, as well as zones of instability.</p> <p>National Ecological Reservation is a territory classification of sensitive areas for “ecosystem services” where water issues are addressed, and some restrictions are in place to prevent negative impacts in slopes, valleys and other sensible situations. Every forest projects and plans must comply with this regulation, and they should be in place, for example in projected soil preparation techniques.</p> <p>ICNF Handbook for forest best practices defines: “In the areas surrounding the water lines the risk of erosion is often very high, since these are areas of concentration of rainwater runoff. In these bands (with a minimum width of 10 meters for each side, as stated in the legal definitions and conditions of legal limits (<u>Decree-Law no. 468/71, of 5 November</u>) a strict prevention of erosion phenomena shall be performed, and it is therefore essential to adopt measures to protect it, such as maintaining all or a significant part of the spontaneous vegetation and not perform any mobilization of the soil.”</p> <p>Decree-law nº 173/88, May 17th establishes the definition of premature cutting operations on Eucalyptus and Pinus Pinaster settlements and defines limitations for these operations.</p> <p>Decree-law nº 139/89, April 28th establishes the legal framework for the protection of natural declination, arable soil and vegetation cover.</p> <p>Decree-law nº151-B, July 19th defines the obligation to perform an Environmental Impact Assessment on every afforestation and reforestation occurring on areas ≥ 350ha (70ha on sensitive areas) or ≥140ha (30ha in sensitive areas) if the subject area, in conjunction with pre-existent forest stands of the same species, separated by less than 1 km, would produce a continuous forested area of more than 350ha (70ha in sensitive areas). It also establishes that an Environmental Impact Assessment must be done when there is a deforestation action on areas ≥ 50ha (10ha in sensitive areas). PROF, mainly in the northern regions defines a maximum threshold for clear cutting of 10ha.</p> <p><u>Coelho, Inocência</u>) identifies typical distribution of the Forest private property on several regions of the Portuguese mainland where only Alentejo and Ribatejo regions show an average property size above 7ha per owner and more than 50% of the properties with more than 100ha. For properties with dimensions above 100ha it is mandatory to prepare and submit</p>

	<p>a Forest Management Plan to be analyzed by ICNF which comprises strategies to minimized impact on water resources created by forest operations.</p> <p>The forest operations occurring on other regions of the country, mainly above Tagus river, where more than 50% of the properties have less than 10ha and average sizes ranging from 1,46 to 2,83ha per owner, will unlikely spread across areas greater than 10h, due to the fragmentation of the rural real estate.</p> <p>At a regional level, Municipal Forest Regulations (see references below) define the permitted operations near water lines considering the potential hazard of erosion, fire propagation and water displacement, namely:</p> <ul style="list-style-type: none"> • Species permitted near water lines and riparian galleries, excluding fast growing species from afforestation and reforestation activities (ordinance nº528/89, July 11th) • Mandatory low density of settlements on afforested and reforested areas • Advice on the species considered as appropriate to a defined location; • Use of heavy machinery limited to no less than 10 meters from the water line • Clear cutting operations and management activities must be previously authorized by the municipality. <p>There are forestry best practices handbooks for operations occurring on river basins and forest areas near dams easily accessible online and through forest owners' associations, as well as a strong legal framework regarding operations within the mentioned areas. At the same time, above Tagus river, where the implementation of Forest Management Plans is not as visible as in the south region of Portugal, the property average size is considerably small, what reduces the risk for this indicator. From the above, the risk is considered as low.</p>
<p>Means of Verification</p>	<p>Internet research GIS maps of HCV areas Regional, publicly available data from a credible third party as FSC and PEFC reports Forest Management plan as PGF, PUB, PEIF Game management plans Regional Forest Plans Forest Best Management Practices Forest Operating Procedures Records of BPs' field inspections Monitoring records Publicly available information on the protection of the values identified Historical maps and enquiries with stakeholders Aerial photos Approved EIA when applicable. Records of oil and hazardous chemicals deliveries. Assessment at an operational level of measures designed to minimise impacts on the values identified Erosion and desertification programs and maps</p>
<p>Evidence Reviewed</p>	<p>http://www.icnf.pt/portal/icnf/serv/biblioteca/resource/ficheiros/boas-praticas-florestais/at_download/file https://dre.pt/application/dir/pdf1sdip/1988/05/11400/20632064.pdf https://dre.pt/application/dir/pdf1sdip/1989/04/09800/17811782.pdf https://dre.pt/application/file/a/497960</p> <p>Water Law: Dec-Law n.º 130/2012 22/06</p>

	<p>https://dre.pt/application/dir/pdf1sdip/2012/06/12000/0310903139.pdf National Water Plan: http://www.apambiente.pt/?ref=16&subref=7&sub2ref=9&sub3ref=833 Hydrographical basin Plans http://www.apambiente.pt/?ref=16&subref=7&sub2ref=9&sub3ref=834#pgbh-tabela Reserva Ecológica Nacional Law: https://dre.pt/application/dir/pdf1sdip/2012/11/21200/0630806346.pdf https://www.uc.pt/fluc/nicif/riscos/Documentacao/Territorium/T04_artg/T04_Artg10.pdf https://www.repository.utl.pt/bitstream/10400.5/1307/1/REP-Fabiao%2C%20A.-Madeira_et_al_2007.pdf Strategic Guidance for Intervention on water courses, (Hydrographic Administration of the Centre Region) https://www.apambiente.pt/_zdata/Divulgacao/Projectos/agua/EstudoEstrategico/GuiaIntervencaoLinhasAguaARHC.pdf</p> <p>Forestry Best Practices Handbook for Castelo de Bode Dam, Guiomar, N, Fernandes, J.P.A., http://www.epal.pt/EPAL/docs/default-source/epal/biodiversidade/publica%C3%A7%C3%B5es/manual-de-boas-pr%C3%A1ticas-de-gest%C3%A3o-dos-esp%C3%A7os-florestais.pdf?sfvrsn=10</p> <p>Practical Guide for Interventions on Sensitive Areas, Forestis, 2007, http://forestis.pt/forestis/multimedia/File/Relatorio_Proj/Guia_Areas_Riscos.pdf Example of Forest Municipal Regulations: Cantanhede: http://www.cm-cantanhede.pt/mcsite/Media/upload/2011/20111017165413_Regulamento_Municipal_Floresta.pdf Alvaiázere: http://ftp.cm-alvaiazere.pt/regulamentos/Regulamento_florestal.pdf Ferreira do Zêzere: www.cm-ferreiradozezere.pt/component/attachments/download/1617</p>
Risk Rating	<p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>

	Indicator
2.2.7	Air quality is not adversely affected by forest management activities.
Finding	<p>Air legal framework includes air law and national air quality plan, being Portuguese Environment Agency the national authority. Other police authorities like SEPNA (National Republican Guard) and Nature Guards and Rangers, also have competencies on air pollution inspection actions.</p> <p>Major negative impacts from forests are due to forest fires which are not considered management activities.</p> <p>Burning forest residues at the forest site is prevented with forest feedstock sourcing for biomass and legal framework in force at high fire hazard periods. Forest equipment must comply with EU directives about air pollution.</p>

	<p>According to the National Inventory Report on Greenhouse Gases 1995-2015 developed by Portuguese Environment Agency (APA), Portuguese forest acted as a carbon sink in the period of the study with a net carbon sequester of 753,2 Gigagrams. Only forestry and agriculture showed this trend during the period of the study.</p> <table border="1"> <thead> <tr> <th>GHG SOURCE AND SINK CATEGORIES</th> <th>1990</th> <th>1991</th> <th>1992</th> <th>1993</th> <th>1994</th> <th>1995</th> <th>1996</th> <th>1997</th> <th>1998</th> <th>1999</th> <th>2000</th> <th>2001</th> <th>2002</th> </tr> </thead> <tbody> <tr> <td colspan="14" style="text-align: center;">CO₂ equivalent (Gg)</td> </tr> <tr> <td>1. Energy</td> <td>41,222</td> <td>42,837.714</td> <td>47,376</td> <td>46,063</td> <td>46,768</td> <td>50,291</td> <td>47,655</td> <td>50,209</td> <td>54,603</td> <td>61,907</td> <td>60,311</td> <td>60,493</td> <td>64,129</td> </tr> <tr> <td>2. 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Industrial processes and product use</td> <td>7,390.74</td> <td>8,112.36</td> <td>8,138.95</td> <td>7,934.81</td> <td>8,788.28</td> <td>8,623.19</td> <td>6,943.93</td> <td>7,367.93</td> <td>6,788.13</td> <td>6,514.21</td> <td>7,002.50</td> <td>7,503.08</td> <td>7,578.89</td> <td>29.8</td> </tr> <tr> <td>3. Agriculture</td> <td>6,552.93</td> <td>6,663.75</td> <td>6,613.00</td> <td>6,551.88</td> <td>6,661.10</td> <td>6,630.12</td> <td>6,541.58</td> <td>6,472.12</td> <td>6,436.58</td> <td>6,481.31</td> <td>6,468.34</td> <td>6,566.04</td> <td>6,623.53</td> <td>-5.1</td> </tr> <tr> <td>4. Land use, land-use change and forestry(5)</td> <td>1,671.89</td> <td>-7,984.21</td> <td>497.83</td> <td>-8,967.83</td> <td>-12,560.38</td> <td>-14,004.39</td> <td>-13,933.93</td> <td>-11,376.84</td> <td>-11,461.53</td> <td>-8,994.41</td> <td>-8,521.52</td> <td>-9,971.68</td> <td>-8,776.33</td> <td>-753.2</td> </tr> <tr> <td>5. 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Land use, land-use change and forestry(5)	1,344	1,436.1064	-3,327	-4,459	-5,123	-4,724	-8,578	-9,553	-8,082	-8,847	-6,031	-9,431	-8,908	5. Waste	5,361	5,550.3718	5,782	5,965	6,243	6,535	6,573	6,775	7,063	7,139	7,215	7,361	7,654	6. Other	NO	GHG SOURCE AND SINK CATEGORIES	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	% change 1990-2015	CO ₂ equivalent (Gg)															1. Energy	59,038.61	61,303.39	63,708.45	59,317.52	56,210.27	54,241.84	52,998.33	48,530.40	47,870.85	46,422.83	44,280.28	43,786.66	48,157.50	16.8	2. Industrial processes and product use	7,390.74	8,112.36	8,138.95	7,934.81	8,788.28	8,623.19	6,943.93	7,367.93	6,788.13	6,514.21	7,002.50	7,503.08	7,578.89	29.8	3. Agriculture	6,552.93	6,663.75	6,613.00	6,551.88	6,661.10	6,630.12	6,541.58	6,472.12	6,436.58	6,481.31	6,468.34	6,566.04	6,623.53	-5.1	4. 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3. Agriculture	6,981	7,001.1512	6,891	6,838	6,864	6,903	7,100	7,124	7,071	7,203	7,344	7,113	7,007																																																																																																																																																																																																																												
4. Land use, land-use change and forestry(5)	1,344	1,436.1064	-3,327	-4,459	-5,123	-4,724	-8,578	-9,553	-8,082	-8,847	-6,031	-9,431	-8,908																																																																																																																																																																																																																												
5. Waste	5,361	5,550.3718	5,782	5,965	6,243	6,535	6,573	6,775	7,063	7,139	7,215	7,361	7,654																																																																																																																																																																																																																												
6. Other	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO																																																																																																																																																																																																																												
GHG SOURCE AND SINK CATEGORIES	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	% change 1990-2015																																																																																																																																																																																																																											
CO ₂ equivalent (Gg)																																																																																																																																																																																																																																									
1. Energy	59,038.61	61,303.39	63,708.45	59,317.52	56,210.27	54,241.84	52,998.33	48,530.40	47,870.85	46,422.83	44,280.28	43,786.66	48,157.50	16.8																																																																																																																																																																																																																											
2. Industrial processes and product use	7,390.74	8,112.36	8,138.95	7,934.81	8,788.28	8,623.19	6,943.93	7,367.93	6,788.13	6,514.21	7,002.50	7,503.08	7,578.89	29.8																																																																																																																																																																																																																											
3. Agriculture	6,552.93	6,663.75	6,613.00	6,551.88	6,661.10	6,630.12	6,541.58	6,472.12	6,436.58	6,481.31	6,468.34	6,566.04	6,623.53	-5.1																																																																																																																																																																																																																											
4. Land use, land-use change and forestry(5)	1,671.89	-7,984.21	497.83	-8,967.83	-12,560.38	-14,004.39	-13,933.93	-11,376.84	-11,461.53	-8,994.41	-8,521.52	-9,971.68	-8,776.33	-753.2																																																																																																																																																																																																																											
5. Waste	8,004.04	8,120.72	7,674.08	7,599.01	7,453.69	7,008.20	6,862.70	6,921.27	7,049.17	6,819.89	6,574.23	6,339.83	6,380.89	19.0																																																																																																																																																																																																																											
6. Other	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO																																																																																																																																																																																																																											
Means of Verification	<p>Forest Best Management Practices</p> <p>Supply contracts</p> <p>Records of BPs' field inspections</p> <p>Assessment at an operational level of measures designed to minimise impacts on the values identified</p> <p>Publicly available information on the protection of air quality as APA website.</p> <p>Regional, publicly available data from a credible third party</p> <p>The existence of a strong legal framework in the region</p>																																																																																																																																																																																																																																								
Evidence Reviewed	<ul style="list-style-type: none"> • Environmental Laws : Law n.º 19/14 de 14/04 artº10ºd) DL nº49/05, de 24/02 artº20º • DL 197/2005, de 8/11 artº 1º, nº3 b) e nº4, Decree-Law n.º 102/2010 of 23/09 https://dre.pt/application/dir/pdf1sdip/2010/09/18600/0417704205.pdf Machinery <ul style="list-style-type: none"> • NP 1948, de 1994 • NP 2761, de 1988 • NP EN 13525:2005+A2:2009 																																																																																																																																																																																																																																								
Risk Rating	<p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>																																																																																																																																																																																																																																								

	Indicator
2.2.8	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	<p>The national legal framework for agrochemicals use is the Law nº 26/2013 from April 11th which applies to Portuguese context the EU Directive n.º 2009/128/CE, of 21/10 and it states:</p> <ul style="list-style-type: none"> - Only distributing companies and sales outlets authorized by the Directorate-General for Food and Veterinary (DGAV) may carry out the activity of distribution or sale of fitopharmaceuticals; - Establishes the qualification requirements for the responsible technician for the trade of the chemical products; - Defines the minimum training required for the user and applicator of the fitopharmaceuticals; - Defines the good practices to reduce the negative impacts of the use of fitopharmaceuticals. <p>The implementation of this law had a very positive impact on use of agrochemicals, and included the needing of accredited and records (quantities, disposals, etc.) to all the involved operators.</p> <p>The use of chemicals on Portuguese forests is not common and it is very restricted to a few cases because, among others, there are few homologate products applied to the most important phitosanitary forest plagues and diseases.</p> <p>Based on available information the requirements included in this indicator are considered low risk.</p>
Means of Verification	<p>Existing legislation; Level of enforcement; Assessment at an operational level of measures designed to minimize impacts on the values identified; Monitoring records; Interviews with staff. Records of chemicals deliveries;</p>
Evidence Reviewed	<p>Law n.º 26/2013 de 11 /04: https://dre.pt/application/file/260367 Pine processionary official Plan: http://www.icnf.pt/portal/florestas/prag-doe/resource/doc/proc/proc-florest-2015.pdf Eucalyptus snout beetle official plan: http://www.icnf.pt/portal/florestas/prag-doe/ag-bn/gorg-eucal</p>
Risk Rating	<p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>

	Indicator
2.2.9	Methods of waste disposal minimise negative impacts on forest ecosystems (CPET S5d).
Finding	<p>The legal framework for waste disposal is based on a recent law which applies, to Portuguese legal framework, EU Directive n. ° 2008/98/CE.</p> <p>Portuguese Environment Agency is the national authority but other police authorities like SEPNA (National Republican Guard) and Nature Guards and Rangers have surveillance competencies in this matter, as well as municipal authorities that can implement municipal regulations in conformity with the relevant legislation.</p> <p>Waste disposal on forest lands exist in Portugal and it affects both private and public lands.</p> <p>But as it is illegal in the country there are efforts made by private owners and authorities to collect the waste and send it to final legal destination.</p> <p>Some of the measures used by owners include fencing of their lands, sign installation against waste disposal and filling complaints to authorities in case of illegal waste disposal.</p> <p>Based on available information the requirements included in this indicator are considered low risk.</p>
Means of Verification	Existing legislation; Level of enforcement; Regional Best Management Practices
Evidence Reviewed	Waste Management and Planning Official page: https://www.apambiente.pt/index.php?ref=16&subref=84 Decree-Law n.º 73/2011 de 17/06: https://www.apambiente.pt/_zdata/Politicar/Residuos/DL_73_2011_DQR.pdf Waste National Management Plan: file:///C:/Users/imobi_000/Downloads/Projeto_PNGR_2011-2020.pdf European Waste Statistical: http://ec.europa.eu/eurostat/statistics-explained/index.php/Waste_statistics/pt
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.3.1	<p>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.</p>
Finding	<p>Statistical information on National Forest Inventory is fully available from IFN5 (2005) and preliminary results from IFN6 (2010).</p> <p>Preliminary results from IFN6 (2010) for main species in pellet production show that:</p> <ul style="list-style-type: none"> • Total forest area in Mainland Portugal is 3,154,800 has of which 2,972,356 has correspond to forested area. • Eucalyptus is specie with larger area of settlements. Forest cover with Eucalyptus has increase 13% from 1995 to 2010 (over 90,000 has in the period to a total surface of 812,000 has in 2010; 755,355 has on forested areas) mostly on areas converted from Pinus pinaster (70,000 has in the period). Pinus Wilt Disease/Nemátodo-do-pinheiro pest, fires and economic motivations can be behind it. • Pinus pinaster forests have decrease significantly from 1995 to 2010: 27% on total surface (263,000 has in the period to a total surface of 713,000 has in 2010; 624,248 ha on forested areas). 163,000 has was converted to open land, mostly related to Pinus Wilt Disease/Nemátodo-do-pinheiro pest and fires and 70,000 has to Eucalyptus plantations, which can also include economic motivations. Represents the majority of inputs in BP feedstock. • Pinus pinea forests have increase significantly form 1995 and 2010: 54% (over 55,000 has in the period to a total surface of 175,000 has in 2010; 173,716 has on forested areas). This specie is planted primarily for harvest of pine nuts and protective land use. Have impact on feedstock in southern pellet plants. It is not subject to harvest for round wood production so feedstock comes as a result of silvicultural works. This specie has good biomass percentage in relation to its volume as a result of branches. <p>Analysing statistical information available for average annual growth (AMA) from IFN5 (2005) show for Mainland Portugal:</p> <ul style="list-style-type: none"> • On Eucalyptus an average annual growth of 4,375,000 m3/year based on 2005 inventory data. Currently the value will be significantly higher. Eucalyptus wood from Portugal consumption in 2014 was 5,400,000 m3 (CELPA data). Eucalyptus is fast growing specie, over 12 years, with one and only cut on the period: final clear cut. So harvesting does not compromise long-term production of the forest. • On Pinus pinaster an average annual growth of 3,650,000 m3/year based on 2005 inventory data. Currently the value will be lower. Pinus pinaster wood from Portugal harvested in 2014 was 2,247,000 m3 (Centro Pinus data). So Pinus pinaster wood available from Portugal in under AMA. <p>On the analysis it is relevant also to take into account that:</p> <ol style="list-style-type: none"> 1. Pinus Wilt Disease/Nemátodo-da-madeira-do-pinheiro pest have affected significantly to Pinus pinaster. 2. Fires continue to be a relevant problem in Portugal. 3. Data from CentroPinus states that pine wood consumption of timber industry in 2014 was 4,360,000 m3, with a relevant data a 1,400,000 m3 for pellets, 32% of total. Also 32% of pine wood used by CentroPinus partners was imported in 2014. Percentage of imported pine wood used in 2006 was 3%. So lack of pine wood from Portugal is being covered with importations, mainly from Spain.

	<p>4. Data from CELPA states that Eucalyptus consumption of pulp and paper industry in 2014 was 7,800,000 m³ (4,980,000 m³ in 2005), of which 2,415,000 m³ were imported, mainly from Spain.</p> <p>So all above information shows that actual harvesting volume does not exceed sustainable values and compromises long-term economic viability of stands. Thus the risk for this indicator has been assessed as Low.</p>
Means of Verification	Volume and growth data and yield calculations, and Operational Practice indicate that biomass feedstock harvesting rates avoid significant negative impacts on forest productivity and long-term economic viability.
Evidence Reviewed	<p>Estrategia Nacional das Florestas (RCM n.º 6-B/2015 - Diário da República n.º 24/2015, 1º Suplemento, Série I de 2015-02-04); ICNF portal (http://www.icnf.pt/portal/icnf/docref/enf)</p> <p>Estatísticas Agrícolas 2015.xls, Instituto Nacional Estatística (https://www.ine.pt/xportal/xmain?xpid=INE&xpgid=ine_publicacoes&PUBLICACOESpub_boui=271434407&PUBLICACOESmodo=2)</p> <p>Inventário Florestal Nacional IFN5 (FloreStat_IFN5); ICNF portal (http://www.icnf.pt/portal/florestas/ifn/ifn5/rel-fin)</p> <p>Inventário Florestal Nacional IFN6, preliminary results (IFN6 - Resultados preliminares.pdf); ICNF portal (http://www.icnf.pt/portal/florestas/ifn/ifn6)</p> <p>Boletim-Estatístico-da-Celpe-de-2014 (http://www.celpe.pt/wpcontent/uploads/2016/09/Boletim_WEB_2015.pdf)</p> <p>Relatório-de-Characterização-da-FiLawra-Florestal-2014 (http://www.aiff.org.pt/assets/Relatorio-de-Characterizacao-da-FiLawra-Florestal-2014-160p-CAPA-3-spread....pdf)</p> <p>FiLawra do Pinho: desafios e oportunidades (centroPINUS_JoaoGoncalves dados fiLawra pinho 2014.pdf); Centro Pinus (http://www.centropinus.org/index.php?lingua=1)</p> <p>Decreto Law 16-2009 planos gestão florestal (https://dre.pt/application/dir/pdf1sdip/2009/01/00900/0026800273.pdf); ICNF portal (http://www.icnf.pt/portal/icnf/legisl/legislacao/2009/Decree-law-n.o-16-2009-de-14-de-janeiro.-d.r.-n.o-9-serie-i)</p> <p>Normas Técnicas Planos Gestão Florestal, ICNF portal (http://www.icnf.pt/portal/florestas/gf/pgf/resource/doc/manual/normas-tecnPGF-AFN.pdf)</p>
Risk Rating	<p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>

	Indicator
2.3.2	Adequate training is provided for all personnel, including employees and contractors (CPET S6d).
Finding	National Strategy for Forests states that focus on the professionalization and training of the different actors in the forestry sector shows key importance for increasing the competitiveness and, thereby, the development of the sector.

	<p>ICNF develops training actions aimed for forest operators, foresters, inspectors, forest managers through COTF (Forestry Techniques Operational Centre). This Centre is under direct management of ICNF and has, as its main objective to provide training and professional skills enhancement to operators with special emphasis on forest operations, use and maintenance of machinery and equipment, technologies and techniques applied. Training courses always comprise the attention to safety, hygiene and health at the work place. COTF is operative since 1984 and provides yearly training courses for forest companies, ICNF staff, inspectors, as well as information and promotion activities in schools and other public events.</p> <p>There are training activities promoted by Organizations of Forest Producers (OPF) engaged with Municipalities and local authorities as well as courses undertaken by private entities throughout the country.</p> <p>Portugal has a long tradition of forests activities. Universities network supply high education courses in the field of forestry engineering, agronomy, environment engineering, among others. There are, as well, specific courses for field machinery operators.</p> <p>Several professional schools, agro forestry training centres and public institutes have several training courses directed to forestry operators has demonstrated below: http://www.eppovoacao.pt/index.php?page=277 http://forestis.pt/pagina.8.8.aspx http://www.drapn.min-agricultura.pt/BDFPA/documentos/Florestas.pdf http://moodle.epafbl.edu.pt/course/view.php?id=339 http://academiacomenius.com/course/operador-de-maquinas-multifuncoes-processadora-e-feller/</p> <p>The risk for this indicator is assessed as specified.</p>
<p>Means of Verification</p>	<p>Existing legislation Level of enforcement Training reports Records of BPs' field inspections Training records Interviews with staff Training plans, training records, and records of qualifications</p>
<p>Evidence Reviewed</p>	<p>Estrategia Nacional das Florestas (RCM n.º 6-B/2015 - Diário da República n.º 24/2015, 1º Suplemento, Série I de 2015-02-04); ICNF portal (http://www.icnf.pt/portal/icnf/docref/enf) Centro de Operações e Técnicas Florestais (COTF) - Segurança e Saúde, ICNF portal (http://www.icnf.pt/portal/florestas/gf/cotf/); (http://www.icnf.pt/portal/florestas/gf/cotf/o-q-e/); (http://www.icnf.pt/portal/florestas/gf/cotf/formacao) Catalogo Nacional de Formações (http://www.catalogo.anqep.gov.pt/PDF/QualificacaoReferencialPDF/1065/CA/duplcertificacao/623314_RefCA) http://www.catalogo.anqep.gov.pt/boDocumentos/getDocumentos/522</p>
<p>Risk Rating</p>	<p><input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>
<p>Comment or Mitigation Measure</p>	<p>Training data including training material, presence sheets and assessment</p>

	Indicator
2.3.3	Analysis shows that feedstock harvesting and biomass production positively contribute to the local economy, including employment.
Finding	<p>Statistic for forest sector in total, shown that value added of forest production in Portugal is 1,193million euro (M€) in 2014, with a sustained growth over last years. Also 2014 forestry goods production have an estimation of 878.25 M€ of which wood for energy is 55.38 M€ (6%).</p> <p>Data from INE 2012 states that 91% of Portuguese forest sector enterprises have from 1 to 10 workers. Forest industries employ 78,000 people (12% of all Portuguese processing industry, 1.7% of Portuguese employed population) of which 10,600 work on logging companies and 20,800 on wood industry. Also annual turnover of forest sector industries was in 2012 over 7,392M€ (2,497.6M€ wood and furniture industry, 1,320.4 M€ cork industry and 3,574.6 M€ pulp and paper industry), representing 10% of all Portuguese processing industry. Despite the recent crisis, the forest sector has maintained its contribution, in macroeconomic terms, in terms of added value.</p> <p>Biomass/Feedstock with origin in Portuguese forest is supplied through domestic supply chains to BP's so economic impact related to feedstock chain from the forest, transportation, processing and BP is local. Also it is mainly complementary with other wood industries as use on their processes low quality wood (which previously it was not exploited or it was burned) or wastes from industrial processes.</p> <p>With all of these considerations we can conclude that biomass production contributes positively to local economy and thus the indicator has been assessed as low.</p>
Means of Verification	Data analysis
Evidence Reviewed	<p>Estrategia Nacional das Florestas (RCM n.º 6-B/2015 - Diário da República n.º 24/2015, 1º Suplemento, Série I de 2015-02-04); ICNF portal (http://www.icnf.pt/portal/icnf/docref/enf)</p> <p>Estatísticas Agrícolas 2015.xls, Instituto Nacional Estatística (https://www.ine.pt/xportal/xmain?xpid=INE&xpgid=ine_publicacoes&PUBLICACOESpub_boui=271434407&PUBLICACOESmodo=2)</p> <p>Relatório-de-Characterização-da-FiLawra-Florestal-2014 (http://www.aiff.org.pt/assets/Relatorio-de-Characterizacao-da-FiLawra-Florestal-2014-160p-CAPA-3-spread....pdf)</p> <p>FiLawra do Pinho: desafios e oportunidades (centroPINUS_JoaoGonçaves dados fiLawra pinho 2014.pdf); Centro Pinus (http://www.centropinus.org/index.php?lingua=1)</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.4.1	The health, vitality and other services provided by forest ecosystems are maintained or improved (CPET S7a).
Finding	<p>The Operational Program of Forest Health [1] defines a complete action framework comprising implementation assessment reports [2] (diagnosis, identification, monitoring, control, sampling, etc.), informative leaflets (FitoNotícias) [3], Best practices handbook aimed to several steps of forest based operations and a wide diversity of documents and actions aiming to inform and train forest owners and operators on legislation, best practices, precautionary measures among others [4].</p> <p>There are annual implementation reports of the Operational Program of Forest Health as well as assessment reports of more specific action plans, namely, aimed for NMP in coniferous (<i>Bursaphelenchus xylophilus</i>) [5] and <i>Eucalyptus (gonipterus scutellatus)</i> [6].</p> <p>Statistics from IFN5 shows that percentage of heavy damaged trees have increased from 1995 to 2005:</p> <p>Pinus pinaster. From 7% of trees with heavy damage in 1995 to 11% in 2005. Pinus pinea. From 2% to 7%. Eucalyptus. From 4% to 11%</p> <p>These values lead to the development and application of several sanitary actions plans from which the assessment reports data are presented below.</p> <p>From 2008 to April 2013, 22656 plots were monitored and 16545 composite samples were collected (maximum of 5 trees per sample), of which 934 were positive for the presence of NMP. (5,6% of the samples) [Implementation of programs for prospecting, monitoring and control of quarantine organisms – 2013]. From the Report on the Execution of the National Plan for the Control of the Nematode 2014 – During 2014, 12,180 plots were monitored and 9,376 composite samples collected of which 861 were positive for the presence of NMP (9,2% of the samples). All the positive samples detected during the 2014 campaign are located in previously established Intervention Sites (LI) or in their surroundings, essentially in the Central region, Lisbon and Tagus Valley and Alentejo region. This shows that the disease is geographically contained, despite the higher number of positive samples.</p> <p>In the buffer zone (20km from the border with Spain), an area subject to intense monitoring and sampling of the decline trees, 6,261 samples were collected and analyzed, and no positive case of NMP was detected, which allows us to say that this zone remains free of this harmful organism. From the same report: “in 2014, 3,260 traps were installed, resulting in 13,927 monitoring episodes and the identification of a total of 562,310 insects, mainly coleoptera. Of the 8,654 specimens of the vector insect of the NMP, <i>Monochamus galloprovincialis</i>, captured, the presence of NMP was detected in about 30% of the individuals, mainly in Intervention Sites and their surroundings, located in the District of Coimbra and Leiria, in areas distant from the buffer zone.”</p> <p>Law enforcement is observed as shown in the examples reviewed [6].</p> <p>In 2016, SEPNA inspected 24,535 vehicles carrying wood logs and pallets and identified 424 infractions (1,7%) from which 295 refer to the lack of NMP manifest (1,2%) [Activity Report 2016]. A contract [8] between ICNF and a service provider, referring to the execution of specific analysis to monitor the presence of NMP on coniferous samples shows the effective application of control and monitoring measures.</p>

	<p>There is a comprehensive online platform available for forest operators to register activities (Forest operations, transport, pine cone harvesting, resin recollection, etc.) performed on coniferous species. This registry is mandatory for all the above operations. [9]</p> <p>The legal framework related to forest health, pests and diseases is gathered on ICNF webpage - http://www.icnf.pt/portal/florestas/prag-doe/leg. The most relevant pests and diseases are addressed, namely, the ones affecting wood industry more directly– <i>Bursaphelenchus xylophilus</i> and <i>gonipterus scutellatus</i>.</p> <p>Simultaneously, there is an extensive list of communication actions and informative documentation available on ICNF Forest Health page (http://www.icnf.pt/portal/florestas/prag-doe/divulg), showing that efforts were made and are being made in order to promote best practices regarding the improvement of forest health.</p> <p>The Program for Rural Development 2014-2020 (PDR2020) has a line of financial support available for operations related to the safeguarding of the forest against biotic and abiotic agents.</p> <p>The scope of this assessment is the impact/effect of forest operations on the indicators assessed, as is written in the spb standard 1: “Overall evaluation of potential impacts of operations on forest ecosystem health and vitality”. Forest operations have a positive impact on the control of forest diseases as is the case of NMP, since one of the control measures is to cut down the plants showing signs of decline.</p> <p>Regarding the examples given in spb standard 1 for means of verification, Portugal meets them all. There are best practices put in place and promoted through forest associations, municipalities, industrial parties among others. There are monitoring results, examples of law enforcement and implementation reports related to the main diseases and pests. The actual hazard is being managed and through that low risk should be observed.</p>
<p>Means of Verification</p>	<p>Overall evaluation of potential impacts of operations on forest ecosystem health and vitality Assessment of potential impacts at operational level and of measures to minimise impacts Regional Best Management Practices Supply contracts Monitoring results. Experts consultation</p>
<p>Evidence Reviewed</p>	<p>[1] Operational Program of Forest Health, (2014), http://www.icnf.pt/portal/florestas/prag-doe/posf [2] Implementation assessment report, 2015, http://www.icnf.pt/portal/florestas/prag-doe/resource/doc/posf/POSF-Relatorio-execucao-2015-30NOV2016-Aprovado.pdf [3] http://www.icnf.pt/portal/florestas/prag-doe/resource/doc/divul/fitonoticias/Fitonoticia-11-06fev2017.pdf [4] http://www.icnf.pt/portal/agir/boaprat/prag-doenc [5] http://www.icnf.pt/portal/florestas/prag-doe/plan-rel/resourc/doc/rel/nematodo-Relatorio-Anual-Atividade-2014.pdf [6] http://www.icnf.pt/portal/florestas/prag-doe/plan-rel/resourc/doc/rel/gorgulho-Relatorio-anual-atividades_2014 [7] http://www.dgsi.pt/jtrc.nsf/c3fb530030ea1c61802568d9005cd5bb/67e0cabe6a3c046580257f1400434c6d?OpenDocument</p>

	<p>http://www.asae.pt/wwwbase/wwwinclude/ficheiro.aspx?access=1&id=13073 https://blook.pt/caselaw/PT/TRE/513612/ [8] https://www.parlamento.pt/Documents/XIILEG/Abril_2015/relatorioseginterna2014.pdf [9] http://www.base.gov.pt/base2/rest/documentos/17222 [10] http://fogos.icnf.pt/manifesto/TipoLinksEntradalist.asp</p>
<p>Risk Rating</p>	<p> <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA </p>

	Indicator
2.4.2	Natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b).
Finding	<p>Adding to the findings of indicator 2.4.1 and considering pests and diseases are properly managed.</p> <p>The assessment report on the National Forests Strategy (2012) [1] shows that after the implementation of the National Strategy Against Fires in 2006, till 2010, the burned area was reduced significantly, representing <u>25% of the overall burned area in the period 2001/2010</u>. Forest area suffering from fires in the same period, also decreased with the implementation of this strategic plan, accounting for 15% of the 10 year figures. The former National Forest Strategy subject to this assessment set a maximum threshold of 100 000 ha of burned area per year till 2012, which was accomplished, on average, with 72,669 ha/year from 2006 till 2010. This shows that the forest fire hazard was identified and with the management plan put in place, several performance indicators were met, hence impacts were minimized. Instruments to support the implementation of actions to recover the effects of large forest fires are applied every year in order to manage the risks created by the occurrence of forest fires. [2]</p> <p>There is a Program of Forest Rangers [3] in place to promote several activities related to the prevention of fires, operators and public awareness among others. To assess the effectiveness of the activities performed during the year, several activity reports are available with the listing of operations, statistics analysis and other relevant information. [4]</p> <p>In march, 2016, was launched the Action Plan for the Reduction of Fire Occurrences [5], embedded in the National Forest Strategy of 2015.</p> <p>The Protection of forest against forest fires is implemented and applied by every municipality and CCDR has can be seen by searching for Regional and Municipal plans approved and in force.</p> <p>Examples of law enforcement: http://www.gnr.pt/comunicado.aspx?linha=2097 Forest protection against fires – 2016 from GNR [6] Cooperation between ICNF and the Army [7] Surveillance Actions [8] 2012 activities report [9]</p> <p>Considering that effective management activities are put in place regarding the control of forest pests and diseases comprising annual reports and surveillance of forest operators on the compliance with legal requirements, <u>the risk is considered low for management of pests and diseases</u>.</p> <p>Regarding <u>forest fires</u>, the lack of updated reports on the application of national plans against forest fires and the continuous incidence of occurrences raises the <u>risk evaluation on this parameter to specified</u>.</p>
Means of Verification	Regional Best Management Practices Supply contracts Assessment of potential impacts at operational level and of measures to minimise impacts Monitoring results Regional, publicly available data from a credible third party The existence of a strong legal framework in the region Expert consultation

Evidence Reviewed	<p>[1] Assessment report of the National Forests Strategy (2012), http://www.icnf.pt/portal/icnf/docref/resource/doc/docref/enf-aval</p> <p>[2] http://www.icnf.pt/portal/florestas/dfci/relat/raa/ree-2016</p> <p>[3] http://www.icnf.pt/portal/florestas/dfci/sf1/psf</p> <p>[4] http://www.icnf.pt/portal/florestas/dfci/sf1/psf/rel-doc</p> <p>[5] http://www.icnf.pt/portal/florestas/dfci/Resource/doc/PlanoNacionalReducaoNumeroOcorrencias_V1.pdf</p> <p>[6] http://www.prociv.pt/bk/PublishingImages/Lists/Noticias/AllItems/GNR_RESULTADOS%20FINAIS%20DFCI%202016.pdf</p> <p>[7] http://www.icnf.pt/portal/florestas/dfci/Resource/doc/planos-faunos/Relatorio-PLANO-FAUNOS-2016.pdf</p> <p>[8] http://www.gnr.pt/noticias.aspx?linha=6764</p> <p>[9] http://www.icnf.pt/portal/florestas/dfci/Resource/doc/sndfci/apresentacao-sndfci</p>
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.4.3	There is adequate protection of the forest from unauthorised activities, such as illegal logging, mining and encroachment (CPETS7c).
Finding	<p>Unauthorized activities such as illegal logging, mining and encroachment are not a significant problem in Portugal.</p> <p>There are low scale problems as illegal littering, loose dogs, unauthorized sports, theft of firewood, wood or fruits, poaching. Illegal or unauthorized activities in Portuguese forests generally have limited economic or biological impact.</p>
Means of Verification	<p>Records of BPs' field inspections</p> <p>Monitoring records</p> <p>Interviews with staff</p> <p>Interviews with stakeholders</p> <p>Publicly available information (News and media)</p>
Evidence Reviewed	<p>ILLEGAL LOGGING PORTAL, Portugal (http://www.illegal-logging.info/regions/portugal)</p> <p>Transparency international, corruption perception index Portugal (https://www.transparency.org/country/#PRT)</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.5.1	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	<p>Customary Rights are described by the Portuguese Standard for Forest Management (NP4406:2014) as “rights which result from a long series of habitual or customary actions, constantly repeated, which have, by such repetition and by uninterrupted acquiescence, acquired the force of a law within a geographical or sociological unit”.</p> <p>Nevertheless, for a habitual action to be admitted as a rule and, for this reason, be considered a Customary Right, it is indispensable that it is supported by generalized and prolonged use (tradition), assuming the presumption that the general consensus (opinion necessitates) approved such action.</p> <p>Thereby, the following requirements must be observed for a habitual action to be considered within Customary Right:</p> <ul style="list-style-type: none"> • It consists in repeated facts, evenly performed for a long period of time; • Generalized and public practice; and • Consist on licit facts and not contradictory to the law or public order. <p>Cases are, where the custom is considered within the law framework, designated by <i>secundum legem</i>. When the custom completes the law framework, filling in a law deficiency or interpreting it, it is designated as <i>praeter legem</i>.</p> <p>Customary law does not mean that the custom has the force of law, but only a source of law. That is, laws are also based on customs, the "normal use" of society for which the standard was made. Laws must meet what is customary as well as common practices of what is socially and morally right. Hence it is a source of interpretation of norms. It is in this sense that customary law must be understood.</p> <p>The customary right is described in the article 348th of the Portuguese civil code. The interpretation of laws is described in the article 9th of the Portuguese civil code.</p> <p>In the case of community areas, specific legislation regulates rights of use of common forest areas. (Lei dos Baldios)</p> <p>There are no indigenous people or minorities that need special protection in the country, neither local communities whose depend on forest services for their subsistence and for this reason, low risk is found for this indicator.</p>
Means of Verification	<p>Customary use rights are identified and documented</p> <p>Interviews with local communities and other stakeholders, indicate that their rights are being respected</p> <p>Appropriate mechanisms exist to resolve disputes</p> <p>Agreements exist regarding these rights</p>
Evidence Reviewed	<p>Faro Convention, Republic Assembly Resolution nº 47/2008</p> <p>Constitutional Law nº 1/89 from July 8th</p> <p>Law nº 54/2005 from November 15th</p> <p>Law nº 58/2005 December 29th</p> <p>Law nº 107/2001 September 8th</p> <p>Law nº 173/99 September 21st</p> <p>Law nº 7/2008 February 15th</p>

	Law nº 2069 April 24th 1954 Decree-law 47344/66 November 25th Decree-law 400/82 September 23rd
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.5.2	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	Subsistence needs for local communities are assessed as being not applicable for Portugal. Based on the above, it is concluded that there is a low risk of non-compliance with the requirement.
Means of Verification	
Evidence Reviewed	
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.6.1	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	<p>Grievances and disputes, including those relating to tenure and use rights, forest management practices and work conditions in Portugal are regulated by laws. Legal framework includes the Portuguese Constitution, the Labour Code and other specific regulations.</p> <p>The detailed procedures, duties and responsibilities of involved persons are defined in both legislation and other legal regulations. Legislation and justice system provides a route for appeal should people or companies be dissatisfied with the outcome of the dispute resolution process.</p> <p>Land tenure and use rights are object of Civil Code, being land tenure included on private property rights on Constitution article 62th. These rights include communitarian forests and also Forest Renting/leasing contracts.</p> <p>Disputes about forest management practices would involve forest authorities ICNF on both public and private forests. Specific forest management practices should be included on renting and forest services contracts as harvesting contracts.</p> <p>The disputes related to work conditions shall be resolved according to administrative procedures and labour legislation. Trade unions may help in disputes over work conditions.</p> <p>Based on the reviewed evidence it is concluded that there is a low risk of non-compliance with the requirement.</p>
Means of Verification	Existing legal systems Level of enforcement Forest Best Management Practices Renting and harvesting contracts
Evidence Reviewed	Labour Code: Law n.º 7/09 12/02 (http://www.act.gov.pt/(pt-PT)/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx) Portuguese Constitution Civil Code: http://www.pgdlisboa.pt/Laws/Law_mostra_articulado.php?nid=775&tabela=Laws
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.7.1	Freedom of Association and the effective recognition of the right to collective bargaining are respected.
Findin g	<p>Portugal has signed the ILO fundamental conventions, which includes the C87 Freedom of Association and Protection of the Right to Organize Convention (1948) on 1977th and C98 Right to Organize and Collective Bargaining Convention (1949) on 1964. This right is included on Portuguese constitution on article 56. Most part of working activities is covered by an annual working collective convention, which includes the forest sector.</p> <p>International Trade Union Confederation (IUTC) ranks 139 countries against 97 internationally recognised indicators to assess where workers' rights are best protected, in law and in practice. Portugal has a rating of 3, from 1 to 5+, in the ITUC Global Rights Index 2014. This score is given for countries where: (There are) "Regular violation of rights. The government and/or companies are regularly interfering in collective labour rights. There are deficiencies in laws and/or certain practices which make frequent violations possible."</p> <p>Authority directly involved on employment rights and conditions is Work Conditions Authority (ACT) but for many reasons other authorities are related to the issue, as Immigration and Borders Services (SEF) social security services or even tax services. All of them can make inspections to different issues related to work, with the joining of policies authorities as GNR – Republican National Guard and PSP-Public Security Police.</p> <p>ACT has strategic Plans for Agriculture and Forest activities and also does integrated inspections with Spanish authorities for agriculture and forestry activities. Recently one notice state that ACT bought a drone to help agriculture and forestry inspections.</p> <p>Inspective activities of ACT and SEF result on penalties or suspensions when illegal situations are found.</p> <p>It wasn't found law violations identified on the right of freedom of association and collective bargaining in Portuguese forest sector.</p> <p>According to the available information this indicator is classified as low risk.</p>
Means of Verific ation	<p>Legislation</p> <p>Level of enforcement</p> <p>Portuguese constitution</p> <p>Regional, publicly available data from a credible third party</p> <p>Publicly available information (News and media)</p>
Eviden ce Revie wed	<p>Agriculture, Food and Forest Union: http://www.setaa.pt/index.php/Geral/</p> <p>Boletim do Trabalho e Emprego: http://bte.gep.msess.gov.pt/ http://bte.gep.msess.gov.pt/completos/2016/bte4_2016.pdf</p> <p>WWW.ILO: http://www.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO::P13100_COMMENT_ID,P13100_LANG_CODE:3253858,en:NO</p>

	<p>Overview of ILO convention ratifications by Portugal: http://www.ilo.org/public/portugue/region/eurpro/lisbon/html/portugal_convencoes_numero_pt.htm</p> <p>ITUC Global Rights Index The World's Worst Countires for workers: http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf</p> <p>Labor Code• Law n. ° 7/09 12/02 and updates like L69/13, de 30/08 includes collective convention http://www.act.gov.pt/(pt-PT)/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx</p> <p>Portuguese Constitution</p> <p>Government sources:</p> <p>SEF Statistical Annual reports: http://sefstat.sef.pt/relatorios.aspx SEF Inspective news about forest sector: http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=7018 http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=6802</p> <p>ACT Annual Reports: http://www.act.gov.pt/(ptPT)/SobreACT/DocumentosOrientadores/RelatorioActividades/Paginas/default.aspx</p> <p>News about ACT inspective work including forest: http://www.act.gov.pt/(ptPT)/Itens/Noticias/Paginas/ACTeInspe%C3%A7%C3%A3odoTrabalhodeEspanhaema%C3%A7%C3%B5esconjuntas.aspx</p> <p>ACT Strategic Plan for Agriculture and Forestry Activities: http://www.act.gov.pt/(ptPT)/Campanhas/Campanhasrealizadas/Trabalho_Agricola_Florestal/Documentos/Relat%C3%B3rio%20-%20Plano%20a%C3%A7%C3%A3o%20setor%20agr%C3%ADcola%20e%20florestal.pdf</p>
<p>Risk Rating</p>	<p> <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA </p>

	Indicator
2.7.2	Feedstock is not supplied using any form of compulsory labour.
Finding	<p>Portugal has ratified the convention against forced labour (nº29) in 1956.</p> <p>Portuguese legislation is applied against any form of compulsory labour in accordance with Article 160 of the Criminal Code, one who offers, gives, servicemen, calls accepts, transports, harbours or receives a person for the purpose of exploitation, including sexual exploitation, labour exploitation, begging, slavery, harvest organs or other exploitation by criminal activities and he / she has abused the authority resulting from a hierarchical relationship of dependency (whether financial, family or work related) is punished with imprisonment of three to ten years. Source: § (Article 160 of Decree-Law No. 400/82 Penal Code amended by Law No. 59/2007 and Law No. 60/2013).</p> <p>International Trade Union Confederation (IUTC) ranks 139 countries against 97 internationally recognised indicators to assess where workers’ rights are best protected, in law and in practice. Portugal has a rating of 3, from 1 to 5+, in the ITUC Global Rights Index 2014. This score is given for countries where:</p> <p>(There are) “Regular violation of rights. The government and/or companies are regularly interfering in collective labour rights. There are deficiencies in laws and/or certain practices which make frequent violations possible.”</p> <p>ACT has strategic Plans for Agriculture and Forest activities and also does integrated inspections with Spanish authorities for agriculture and forestry activities. Recently one notice state that ACT bought a drone to help agriculture and forestry inspections.</p> <p>Inspective activities of ACT and SEF result on penalties or suspensions when illegal situations are found.</p> <p>Nevertheless, in forestry there wasn’t found any evidence confirming the existence of risks of compulsory and/or forced labour in Portugal.</p> <p>According to the available information this indicator is classified as low risk.</p>
Means of Verification	<p>Legislation</p> <p>Level of enforcement</p> <p>Regional, publicly available data from a credible third party</p> <p>Publicly available information (News and media)</p>
Evidence Reviewed	<p>III National Plan to Prevent and Combat Trafficking in Human Beings 2014-2017 at http://www.igualdade.gov.pt/images/stories/documentos/legislacao/legislacao/Planos_Nacionais/2014-2017-iii-pnpc-tsh-en.pdf</p> <p>Observatory on Traffic in Human Beings: http://www.otsh.mai.gov.pt/Recursos/Pages/default.aspx</p> <p>Reports of Observatory on Traffic in Human Beings: 2015; 2014; 2013; 2012; 2011</p>

	<p>Overview of ILO convention ratifications by Portugal: http://www.ilo.org/public/portugue/region/eurpro/lisbon/html/portugal_convencoes_numero_pt.htm</p> <p>ITUC Global Rights Index The World's Worst Countries for workers: http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf</p> <p>Government sources: SEF Statistical Annual reports: http://sefstat.sef.pt/relatorios.aspx SEF Inspective news about forest sector: http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=7018 http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=6802</p> <p>ACT Annual Reports: http://www.act.gov.pt/(ptPT)/SobreACT/DocumentosOrientadores/RelatorioActividades/Paginas/default.aspx</p> <p>News about ACT inspective work including forest: http://www.act.gov.pt/(ptPT)/Itens/Noticias/Paginas/ACTeInspe%C3%A7%C3%A3odoTrabalhodeEspanhaema%C3%A7%C3%B5esconjuntas.aspx</p> <p>ACT Strategic Plan for Agriculture and Forestry Activities: http://www.act.gov.pt/(ptPT)/Campanhas/Campanhasrealizadas/Trabalho_Agricola_Florestal/Documentos/Relat%C3%B3rio%20-%20Plano%20a%C3%A7%C3%A3o%20setor%20agr%C3%ADcola%20e%20florestal.pdf</p>
Risk Rating	<p> <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA </p>

	Indicator
2.7.3	Feedstock is not supplied using child labour.
Finding	<p>In Portugal the minimum age for employment is 16 years. A minor of 16-year-old can't be used to carry out a paid activity delivered with autonomy unless he / she has completed compulsory education or is enrolled and attending secondary education, and is a work light. This light work should consist of simple tasks and is not likely to adversely affect the physical integrity, safety and health, school attendance, or their, moral, psychological, intellectual and cultural physical well-being. (Art.le 66-83 of the Labour Code) 2009.</p> <p>Portugal has ratified Minimum Age Convention (1973) C138 in 1989th and the convention C182 Worst Forms of Child Labour Convention (1999) on 2000th.</p> <p>International Trade Union Confederation (IUTC) ranks 139 countries against 97 internationally recognised indicators to assess where workers' rights are best protected, in law and in practice.</p>

	<p>Portugal has a rating of 3, from 1 to 5+, in the ITUC Global Rights Index 2014. This score is given for countries where: (There are) “Regular violation of rights. The government and/or companies are regularly interfering in collective labour rights. There are deficiencies in laws and/or certain practices which make frequent violations possible.”</p> <p>UNICEF report 2012 “Measuring Child Poverty was rating 14,7% of Portuguese children below 16 years age as below “poverty line”.</p> <p>Robust data about child labour are not recent, as the last official inquiry report is from 2001, and the results were not positive as 4,1% of children of the study were affected by child labour (CNAsti), with half of this proportion related to agriculture.</p> <p>2015: FSC Portugal CNRA report states “Despite evidence of some (remaining) cases of child labour, there is evidence that this problem is not structural nor of large size. No evidence found of cases of child labour in the forest sector. The national CWRA explicitly mentions “child labour in the forest sector in Portugal is very low”. There is evidence that the number of minors working illegally is rather insignificant.</p> <p>Authority directly involved on employment rights and conditions is Work Conditions Authority (ACT) but for many reasons other authorities are related to the issue, as Immigration and Borders Services (SEF) social security services or even tax services. All of them can make inspections to different issues related to work, with the joining of policies authorities as GNR – Republican National Guard and PSP-Public Security Police.</p> <p>ACT has strategic Plans for Agriculture and Forest activities and also does integrated inspections with Spanish authorities for agriculture and forestry activities. Recently one notice state that ACT bought a drone to help agriculture and forestry inspections.</p> <p>Inspective activities of ACT and SEF result on penalties or suspensions when illegal situations are found.</p> <p>Nevertheless, based on the available information it wasn’t found any evidence confirming the existence of risks of child labour in forestry in Portugal.</p>
<p>Means of Verification</p>	<p>Legislation Level of enforcement Regional, publicly available data from a credible third party Publicly available information (News and media)</p>
<p>Evidence Reviewed</p>	<p>Legislation: Labor Code•:Law n.º 7/09 from 12/02 http://www.act.gov.pt/(pt-PT)/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx</p> <p>Law n.º 47/2012, de 29/08 at http://www.cnasti.pt/cnasti/documentos/1403451265.pdf</p> <p>Decree Republic President 28/2000 1/06 at http://www.ilo.org/public/portugue/region/eurpro/lisbon/pdf/conv_182.pdf</p> <p>Republic Assembly Resolution 11/98 at http://www.ilo.org/public/portugue/region/eurpro/lisbon/pdf/conv_138.pdf</p> <p>Government sources: SEF Statistical Annual reports: http://sefstat.sef.pt/relatorios.aspx SEF Inspective news about forest sector:</p>

	<p>http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=7018 http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=6802</p> <p>ACT Annual Reports: http://www.act.gov.pt/(ptPT)/SobreACT/DocumentosOrientadores/RelatorioActividades/Paginas/default.aspx</p> <p>News about ACT inspective work including forest: http://www.act.gov.pt/(ptPT)/Itens/Noticias/Paginas/ACTeInspe%C3%A7%C3%A3odoTrabalhodeEspanhaema%C3%A7%C3%B5esconjuntas.aspx</p> <p>ACT Strategic Plan for Agriculture and Forestry Activities: http://www.act.gov.pt/(ptPT)/Campanhas/Campanhasrealizadas/Trabalho_Agricola_Florestal/Documentos/Relat%C3%B3rio%20-%20Plano%20a%C3%A7%C3%A3o%20setor%20agr%C3%ADcola%20e%20florestal.pdf</p> <p>Other Sources: Overview of ILO convention ratifications by Portugal: http://www.ilo.org/public/portugue/region/eurpro/lisbon/html/portugal_convencoes_numero_pt.htm</p> <p>Social characterization of aggregates Portuguese Family with Children in School Age http://www.cnasti.pt/cnasti/documentos/1403450788.pdf</p> <p>UNICEF Innocenti Research Centre (2012), 'Measuring Child Poverty: New league tables of child poverty in the world's rich countries', Innocenti Report Card 10, UNICEF Innocenti Research Centre, Florence at ITUC Global Rights Index The World's Worst Countries for workers: http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf</p>
Risk Rating	<p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>

	Indicator
2.7.4	Feedstock is not supplied using labour which is discriminated against in respect of employment and occupation.
Finding	<p>Protection against discrimination in labour is included in Portuguese constitution (Article 55th), and labour code.</p> <p>Portugal has ratified ILO convention about discrimination on work and career C111 (1958) on year 1959th. Also convention about equal remuneration C100 was ratified on year 1966th.</p> <p>Portugal is well positioned at majority of international reports:</p> <ul style="list-style-type: none"> • Corruption Perception Index scores 63 meaning low perceived level of corruption; • Worldwide Governance Indicators (WGI) from 73.3 to 84.13 (1-100points) <p>The WGI report six aggregate governance indicators for over 200 countries and territories over the period 1996-2014, covering 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.</p> <ul style="list-style-type: none"> • Free country on press, net, political rights and civil liberties. <p>On the other side Portugal (including human rights, illegal logging, forest and timber) is not listed in alarming reports or indexes such as:</p> <ul style="list-style-type: none"> • Committee to Protect Journalists Impunity Index; • Human Rights Watch; • Global Witness • Chatham House • Amnesty International <p>Some observations were found about women discrimination on jobs and remuneration and gender pay gap (see below Direct Request (CEACR) - adopted 2014, published 104th ILC session (2015) Equal Remuneration Convention, 1951 (No. 100) – Portugal).</p> <p>Also discrimination episodes were found against Roma and LGB (see below Amnesty International 2014/2015 report The State of the World’s Human Rights) but not related to work activities.</p> <p>Authority directly involved on employment rights and conditions is Work Conditions Authority (ACT) but for many reasons other authorities are related to the issue, as Immigration and Borders Services (SEF) social security services or even tax services. All of them can make inspections to different issues related to work, with the joining of policies authorities as GNR – Republican National Guard and PSP – Public Security Police.</p> <p>ACT has strategic Plans for Agriculture and Forest activities and also does integrated inspections with Spanish authorities for agriculture and forestry activities. Recently one notice state that ACT bought a drone to help agriculture and forestry inspections.</p> <p>Inspective activities of ACT and SEF result on penalties or suspensions when illegal situations are found.</p> <p>Based on the available information, it wasn’t found any evidence that confirms the existence of risks of discrimination against in respect of employment and occupation in forestry in Portugal.</p>

<p>Means of Verification</p>	<p>Legislation Level of enforcement Regional, publicly available data from a credible third party Publicly available information (News and media)</p>
<p>Evidence Reviewed</p>	<p>Legislation:</p> <ul style="list-style-type: none"> • Portuguese Constitution • Labor Code • Law n. 7/09 from 12/02 http://www.act.gov.pt/(pt-PT)/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx • Dec-Law 42520/1959 23/09 at http://www.ilo.org/public/portugue/region/eurpro/lisbon/pdf/conv_111.pdf • Dec-Law 47 302/1966 on 04/11 at http://www.ilo.org/public/portugue/region/eurpro/lisbon/pdf/conv_100.pdf <p>Other sources:</p> <ul style="list-style-type: none"> • Transparency International http://www.transparency.org/cpi2015#map-container • UN Sanctions List at: https://www.un.org/sc/suborg/en/sanctions/un-sc-consolidated-list • World Bank: Worldwide Governance Indicators http://info.worldbank.org/governance/wgi/index.aspx#countryReports • Freedom house: https://freedomhouse.org/report/freedom-world/freedom-world-2016 • Committee to Protect Journalists https://www.cpi.org/reports/2014/04/impunity-index-gettingaway-with-murder.php • Human Rights Watch: http://www.hrw.org/world-report/2015 • Global Witness: www.globalwitness.org <p>Chattam House Illegal Logging Indicators Country Report Card http://www.illegal-logging.info</p> <ul style="list-style-type: none"> • Amnesty International 2014/2015 report: https://www.amnesty.org/en/documents/pol10/0001/2015/en/ • Direct Request (CEACR) - adopted 2014, published 104th ILC session (2015) Equal Remuneration Convention, 1951 (No. 100) – Portugal http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:13100:0::NO::P13100_COMMENT_ID:3186668 • Overview of ILO convention ratifications by Portugal: http://www.ilo.org/public/portugue/region/eurpro/lisbon/html/portugal_convencoes_numero_pt.htm <p>SEF Statistical Annual reports: http://sefstat.sef.pt/relatorios.aspx SEF Inspective news about forest sector: http://www.sef.pt/portal/v10/PT/asp/news/Noticias_Detalhe.aspx?id_linha=7018 http://www.sef.pt/portal/v10/PT/asp/news/Noticias_Detalhe.aspx?id_linha=6802</p> <p>ACT Annual Reports: http://www.act.gov.pt/(ptPT)/SobreACT/DocumentosOrientadores/RelatorioActividades/Paginas/default.aspx</p> <p>News about ACT inspective work including forest: http://www.act.gov.pt/(ptPT)/Itens/Noticias/Paginas/ACTeInspe%C3%A7%C3%A3odoTrabalhoeEspanhaema%C3%A7%C3%B5esconjuntas.aspx</p> <p>ACT Strategic Plan for Agriculture and Forestry Activities:</p>

	http://www.act.gov.pt/(ptPT)/Campanhas/Campanhasrealizadas/Trabalho_Agricola_Florestal/Documentos/Relat%C3%B3rio%20-%20Plano%20a%C3%A7%C3%A3o%20setor%20agr%C3%ADcola%20e%20florestal.pdf
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.7.5	Feedstock is supplied using labour where the pay and employment conditions are fair and meet, or exceed, minimum requirements.
Findings	<p>Minimum wage is included in Portuguese constitution (Article 59th), and labour code. Portugal has ratified ILO convention about minimum wage C131 (1970) on year 1981. Also convention about salary protection C95 was ratified on year 1981. Payment and employment conditions are included and are updated on labour code. Authority directly involved on employment conditions is Work Conditions Authority (ACT) but for many reasons other authorities are related to the issue, as Immigration and Borders Services (SEF) social security services or even tax services. All of them can make inspections to different issues related to work, with the joining of policies authorities as GNR-Republican National Guard and PSP-Public Security Police.</p> <p>ACT has strategic Plans for Agriculture and Forest activities and also does integrated inspections with Spanish authorities for agriculture and forestry activities. Recently one notice state that ACT bought a drone to help agriculture and forestry inspections. Inspective activities of ACT and SEF result on penalties or suspensions when illegal situations are found.</p> <p>According to the available information about employment conditions, there is a legal framework in the country, and there are legal authorities to enforce legislation. So it is considered that Portugal has low risk that pay and employment conditions are not fair and doesn't meet, or exceed, minimum requirements.</p> <p>Low risk.</p>
Means of Verification	Legislation Level of enforcement Regional, publicly available data from a credible third party Publicly available information (News and media)
Evidence Reviewed	Legislation: <ul style="list-style-type: none"> •Portuguese Constitution •Labor Code•: Law n. º 7/09 from 12/02 http://www.act.gov.pt/(pt-PT)/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx Dec-Law: 77/81 on 19/06 at http://www.ilo.org/public/portugue/region/eurpro/lisbon/pdf/conv_131.pdf Dec-Law: 88/81 on 14/07 at http://www.ilo.org/public/portugue/region/eurpro/lisbon/pdf/conv_95.pdf

	<p>Government sources:</p> <p>SEF Statistical Annual reports: http://sefstat.sef.pt/relatorios.aspx</p> <p>SEF Inspective news about forest sector: http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=7018 http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=6802</p> <p>ACT Annual Reports: http://www.act.gov.pt/(ptPT)/SobreACT/DocumentosOrientadores/RelatorioActividades/Paginas/default.aspx</p> <p>News about ACT inspective work including forest: http://www.act.gov.pt/(ptPT)/Itens/Noticias/Paginas/ACTeInspe%C3%A7%C3%A3odoTrabalhodeEspanhaema%C3%A7%C3%B5esconjuntas.aspx</p> <p>ACT Strategic Plan for Agriculture and Forestry Activities: http://www.act.gov.pt/(ptPT)/Campanhas/Campanhasrealizadas/Trabalho_Agricola_Florestal/Documentos/Relat%C3%B3rio%20-%20Plano%20a%C3%A7%C3%A3o%20setor%20agr%C3%ADcola%20e%20florestal.pdf</p>
Risk Rating	<p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>

	Indicator
2.8.1	Appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12).
Finding	<p>In Portugal, health and safety at work is heavily regulated in accordance with the legislation presented, which covers all forestry and forestry-related activities, namely the requirements for group and individual protective equipment, the use/verification of forestry machinery and the use of plant protection products.</p> <p>ACT (Working Conditions Authority) promoted the development of the Strategic Action Plan for Agriculture, livestock and Forestry sectors from 2012 to 2015 producing the assessment report for this initiative (see report). From the execution of this plan 6 informative leaflets were produced as well as 8 instruments for the application of the respective law framework (checklists). The plan involved the participation of several social partners as well as public partners which can be consulted in the report. An estimate of 9000 employers and employees were reached throughout the development of this plan as well as 560 associative managers and technicians.</p> <p>The plan also comprised an inspective component materialized on 1700 inspections over 3 years reaching to 10 000 workers.</p> <p>The National Strategic Plan for The Health and Safety at Work 2015-2020 was launched on May 2016 and it establishes the following strategic objectives:</p> <ul style="list-style-type: none"> iv) Promote the wellbeing at work and the competitiveness of companies; v) Decrease work accidents on 30% and the incidence rate of work accidents on 30% vi) Decrease the risk factors related to occupational diseases. <p>In order to pursue the proposed objectives, a total of 31 measures will be carried out.</p> <p>Data from INE (National Statistics Institute) shows that overall fatal accidents at work decreased from 2011 to 2014 (196 to 160 dead), as well as the fatal accidents on forestry, agriculture and fishing sector (29 to 25) in the same period. [1]</p> <p>The primary sector accounts for around 20% of the fatal accidents occurring in one year in Portugal and employs around 7% of the employed population.</p> <p>More recent numbers from ACT (Work Authority) shows 16 fatal accidents in 2016 in the primary sector, the lowest in 10 years. In the first semester of 2017, 3 fatal accidents were counted. This shows a trend of reduction.</p> <p>ACT reported 5 severe work accidents occurring on Forestry sector in 2014, 10 in 2015 and 6 in 2016. The number of fatal accidents reported was 2, 4 and 8 respectively, for the same period.</p> <p>Law nº 98/2009, September 4th, rules the regime for the repair of work accidents and occupational disease. (http://www.act.gov.pt/(pt-PT)/CentroInformacao/Estatistica/Paginas/default.aspx)</p> <p>Assessment of law enforcement</p>

	<p>Authorities with specific jurisdiction for licensing and inspecting the provisions of health and safety at work legislation in Portugal are:</p> <ul style="list-style-type: none"> – ACT (Autoridade para as condições do Trabalho) [Working Conditions Authority]; – DGS (Direcção Geral de Saúde) [General Directorate of Health]; – ANPC (Autoridade Nacional de Protecção Civil) [National Civil Protection Authority]. <p>All companies must provide an annual report to the Ministério da Solidariedade e Segurança Social [Ministry for Solidarity and Social Security], which is registered in Annex D, with:</p> <ul style="list-style-type: none"> - Quantity and severity of accidents at work and occupational diseases; – Training hours related to OSH (occupational safety and health); – Organization of OSH services; – Risk identification, assessment, and control; – Periodic and occasional aptitude tests; <p>The ACT has recently developed a set of initiatives and projects aimed at the forestry sector. These consist of awareness and training in the most significant risks in forestry.</p> <p>Information is not listed separately for the primary sector, so there are no statistics available on the trend of work accidents in forestry specifically. However, the report “Relatório de Actividades ACT” [‘ACT Activities Report’] confirms that there has been a decrease in accidents at work in the primary sector.</p> <p>Nevertheless, the occurrence of work accidents on the primary sector are still considerably high when compared to other sectors. For this reason, specified risk is assessed for this indicator.</p>
<p>Means of Verification</p>	<p>Accredited professional courses (p.e. chainsaws, machinery operator, phytopharmaceuticals applicator) card and/or specific certificates of training sessions.</p> <p>Records of H& S procedures and Personal Protection Equipment distribution by the Organization.</p> <p>Record of machinery safety tools and equipments on original documental register.</p>
<p>Evidence Reviewed</p>	<p>[1] https://www.ine.pt/xportal/xmain?xpid=INE&xpgid=ine_indicadores&indOcorrCod=0006896&contexto=bd&selTab=tab2 ACT activity reports: http://www.act.gov.pt/(pt-PT)/SobreACT/DocumentosOrientadores/RelatorioActividades/Paginas/default.aspx Law nº7/2009, February 12th – Labour code of 2009 (articles 281^o to 284^o) Law nº 102/2009, September 10th – Legal regime for the promotion of health and safety at work. Special attention shall be given to the articles related to the obligations of employers and employees (article nº 15 to 17^o) and to the operation of the health and safety service at work (article 97^o to 110^o) Law nº 3/2014, January 28th – Second modification of the law nº 102/2009, September 10th, which approves the legal regime for the promotion of health and safety at work as well as the second modification of the Decree-law nº 116/97, May 12th, which brings to the internal legal order, the Council Directive nº93/103/CE, related to the minimum prescriptions of health and safety at the workplace and aboard fishing ships. Ordinance nº 255/2010, May 5th, establishes the requirement template for the authorization of common service, external service and exemption of the internal service of health and safety at the workplace. Ordinance nº 275/2010, May 19th, establishes the applicable fees on the processes for the authorization of Health and Safety at Work services.</p>

Ordinance nº71/ 2015, March 10th, approves the template of the health fitness exam document.

Decree-law nº2/82, May 5th, determines the obligation to report every case of occupational disease to the Caixa Nacional de Seguros de Doenças Profissionais

Decree-law nº159/99, May 11th, modified by the Decree-law nº 382A/99, September 22nd, rules the mandatory insurance against workplace accidents for independent workers.

Ordinance nº 256/2011, July 5th, Approves the uniform part of the general conditions of the compulsory insurance for accidents at work for employed persons, as well as their special uniform conditions

Ordinance 137/94, March 8th,
Approves reporting templates and maps relating to occupational accidents:
[http://www.act.gov.pt/\(ptPT\)/Legislacao/LegislacaoNacional/Paginas/default.aspx](http://www.act.gov.pt/(ptPT)/Legislacao/LegislacaoNacional/Paginas/default.aspx)

Decree-law 347/93, October 1st, Minimum safety and health requirements in the workplace

Ordinance 1456-A/95, December 11th, Minimum requirements for the placing and use of safety and health signs at work

Ordinance 53/71, February 23rd, Prevention of occupational risks and hygiene in industrial establishments, as amended by ordinance 702/80 of 22 September

Decree law 141/1995, June 14th, Minimum requirements for safety and health at work signs;

Ordinance 1456-A/95, December 11th, Regulates the minimum requirements for the placement and use of safety and health signs at work.

D.L. No. 348/1993, of 1 October - minimum requirements for the safety and health of workers in the use of personal protective equipment;

Ordinance 988/93, of 6 October - regulates the minimum safety and health requirements for workers in the use of personal protective equipment;

Law no. 113/99, of 3 August - amends article 12 of Decree-Law no. 348/93 of 1 October on the protection of the safety and health of workers in the use of equipment for individual safety.

D.L. No 330/1993 of 25 February - minimum safety and health requirements for workers in the manual handling of loads;

Law no. 113/99, of August 3 - amends article 10 of Decree-Law no. 330/93 of 25 September on the protection of the safety and health of workers in manual handling of loads.

Decree-Law no. 24/2012, of 6 February - consolidates the minimum requirements for the protection of workers against risks to safety and health due to exposure to chemical agents at work;

Decree-Law no. 88/2015, of 28 May - amends Decree-Law no. 24/2012, of February 6, which consolidates the minimum requirements for the protection of workers against risks to safety and Exposure to chemical agents at work and transposes Commission Directive 2009/161 / EU of 17 December 2009) and (Amendment of Decree-Law no. 301/2000, of 18 November, which regulates the protection of workers against the risks related to exposure to carcinogens or mutagens during work;

Decree-Law No. 301/2000, of 18 November - regulates the protection of workers against the risks related to exposure to carcinogens or mutagens during work;

Order No. 27707/2007, of December 10 - Implementation of the REACH Regulation);

Decree-Law no. 98/2010, of 11 August - establishes the regime for the classification, packaging and labelling of substances dangerous to human health or the environment;

Decree-Law no. 220/2012, of October 10 - Classification, labelling and packaging of substances and mixture;

Decree-Law no. 101/2005 of 23 June - prohibits the use and marketing of asbestos fibres and products containing these fibres in accordance with Annex I, point 16 and Annex II point 18;

	<p>Decree-Law no. 266/2007, of July 24 - establishes the standards of health protection of workers against the risks of exposure to asbestos during work.</p> <p>Decree-Law 84/97, of 16 April, establishes the minimum requirements for the protection of the health and safety of workers against the risks of exposure to biological agents at work;</p> <p>Ordinance No. 405/98, of July 11 - approves the classification of biological agents;</p> <p>Ordinance No. 1036/98, of December 15 - amends the List of classified biological agents, contained in the annex to Administrative Rule no. 405/98, of July 11;</p> <p>Decree-Law No. 2/2001, of January 4 - regulates the contained use of genetically modified microorganisms, with a view to protecting human health and the environment.</p> <p>Decree-Law no. 182/2006 of 6 September - Minimum safety and health requirements for the exposure of workers to risks due to physical agents (noise)</p> <p>Decree-Law no. 46/2006, of 24 February - minimum safety and health requirements regarding the exposure of workers to risks due to mechanical vibration.</p> <p>D.L. No. 50/2005, of 25 February - minimum safety and health requirements for workers in the use of work equipment;</p> <p>D.L. No 103/2008 of 24 June - rules governing the placing on the market and putting into service of machinery and the placing on the market of partly completed machinery;</p> <p>Decree-Law no. 221/2006, of November 8 - establishes the rules regarding noise emission of equipment for use abroad.</p> <p>Decree-Law 103/2008, of June 24 - establishes the rules regarding the placing on the market and putting into service of the machines and their accessories;</p> <p>Decree-Law no. 75/2011, of 20 June - amends articles 3, 4, 12, 14 and 19 of Decree-Law no. 103/2008, Of 24 June, establishing the essential environmental protection requirements for the placing on the market and the</p> <p>Putting into service of pesticide application machines;</p> <p>Decree-Law no. 214/95, of August 18 - establishes the conditions of use and commercialization of used machines, aiming at the protection of the health and safety of users and third parties;</p> <p>Ordinance nº 172/2000, of March 23 - defines the complexity and characteristics of the used machines that are especially dangerous.</p>
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	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 the National Inventory Report on Greenhouse Gases 1995-2015 developed by Portuguese Environment Agency (APA), Portuguese forest acted as a carbon sink in the period of the study with a net carbon sequester of 753,2 Gigagrams. Only forestry and agriculture showed this trend during the period of the study.

GHGe SOURCE AND SINK CATEGORIES	1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002
	CO ₂ equivalent (Gg)												
1. Energy	41,222	42,837.714	47,376	46,063	46,768	50,291	47,655	50,209	54,603	61,907	60,311	60,493	64,129
2. Industrial processes and product use	5,839	5,800.7327	5,504	5,398	5,429	6,107	6,131	6,608	6,772	7,168	7,421	6,956	7,319
3. Agriculture	6,981	7,001.1512	6,891	6,838	6,864	6,903	7,100	7,124	7,071	7,203	7,344	7,113	7,007
4. Land use, land-use change and forestry(5)	1,344	1,436.1064	-3,327	-4,459	-5,123	-4,724	-8,578	-9,553	-8,082	-8,847	-6,031	-9,431	-8,908
5. Waste	5,361	5,550.3718	5,782	5,965	6,243	6,535	6,573	6,775	7,063	7,139	7,215	7,361	7,654
6. Other	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO

GHGe SOURCE AND SINK CATEGORIES	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	% change 1990-2015
	CO ₂ equivalent (Gg)													
1. Energy	59,038.61	61,303.39	63,708.45	59,317.52	56,210.27	54,241.84	52,998.33	48,530.40	47,870.85	46,422.83	44,280.28	43,786.66	48,157.50	16.8
2. Industrial processes and product use	7,990.74	8,112.36	8,138.95	7,934.81	8,788.26	8,623.19	6,943.93	7,367.93	6,788.13	6,514.21	7,002.50	7,503.08	7,578.89	29.8
3. Agriculture	6,552.93	6,663.75	6,613.00	6,551.88	6,681.10	6,630.12	6,541.58	6,472.12	6,436.58	6,481.31	6,468.34	6,566.04	6,623.53	-5.1
4. Land use, land-use change and forestry(5)	1,671.89	-7,984.21	497.83	-8,987.83	-12,560.38	-14,004.39	-13,933.93	-11,376.84	-11,461.53	-8,994.41	-8,521.52	-9,971.68	-8,776.33	-753.2
5. Waste	8,004.04	8,120.72	7,674.08	7,599.01	7,453.69	7,008.20	6,862.70	6,921.27	7,049.17	6,819.89	6,574.23	6,339.83	6,380.89	19.0
6. Other	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO

Portuguese forest is defined by its recent origins and by heavy human intervention. In a general way, the Portuguese forest is recent. In Europe, Portugal is the country in which the transition from deforestation to reforestation occurred most rapidly: forest cover, which was between 4 and 7 per cent in 1870, grew in one century to cover more than 30 per cent of the continental territory. [1]

In the best case scenario 7% of the territory can be potentially considered has old mature forest.

According to the preliminary results of IFN6, p. 24, Table 11 [2], Matrix of change in total area by forest species and other soil uses between 2005 and 2010, the area occupied by species that could potentially constitute **natural forests** have had a positive net change of 13,803 ha, representing an increase of 0.97 per cent. See Table 1 below.

	Cork oak	Holm oak	Oak	Chestnut	Carob	Other hardwood	Other softwood	Total
Area occupied in 2005	731,099	334,980	66,016	38,334	12,203	169,390	73,442	1,425,464
Area occupied in 2010	736,775	331,179	67,116	41,410	11,803	177,767	73,217	1,439,267
Change 2005-2010	5,676	-3,801	1,100	3,076	-400	8,377	-225	13,803
Change 2005-2010 (%)	0.78%	-1.13%	1.67%	8.02%	-3.28%	4.95%	-0.31%	0.97%

The Assessment report of the Compliance with the Convention on Wetlands of International Importance (RAMSAR) performed by the Portuguese Audit Office, process number 12/12[3] states that:

“The 16 wetlands listed have, according to the Department of Management of Classified Areas - Wetlands, a good conservation situation (nine) or average (seven), and none of them presents significantly degraded conditions.”.

In the Annex III of the document, an overview of the conservation situation of each listed wetland is presented.

Regarding the outputs from the National Report on the Implementation of Habitats Directive 2013 [4], and referring to habitats that can be considered wetlands, even if not considered in RAMSAR conversion:

	<p>Habitat 4020 Temperate Atlantic wet heaths with <i>Erica ciliaris</i> and <i>Erica tetralix</i>: No threats or pressures of high importance related to forestry and silviculture activities. Despite the conversion of this habitat be considered as inadequate, on the time span of the assessment the conservation trend was considered stable.</p> <p>Habitat 3170 Mediterranean temporary ponds: No threats or pressures of high importance related to forestry and silviculture activities.</p> <p>Habitat 5140 <i>Cistus palhinhae</i> formations on maritime wet heaths: No threats or pressures related to forestry and silviculture activities. Main threats and pressures related to overuse for recreational activities, sports and leisure.</p> <p>Habitat 4010 Northern Atlantic wet heaths with <i>Erica tetralix</i>: No threats or pressures related to forestry and silviculture activities.</p> <p>Habitat 4060 Alpine and Boreal heaths: Favourable status assessed and no threats or pressures of high importance related to forestry and silviculture activities.</p> <p>Habitat 4090 Endemic oro-Mediterranean heaths with gorse: Favourable status assessed and no threats or pressures related to forestry and silviculture activities.</p> <p>Habitat 1150 Coastal lagoons: No threats or pressures related to forestry and silviculture activities.</p> <p>Taking into account the above examples, it is possible to consider that forestry activities doesn't represent high importance threat or pressure for wetlands conservation and protection.</p> <p>Considering the same report, regarding peatlands:</p> <p>Habitat 7140 Transition mires and quaking bogs: No threats or pressures related to forestry and silviculture activities.</p> <p>Habitat 7150 Depressions on peat substrates of the Rhynchosporion: No threats or pressures related to forestry and silviculture activities.</p> <p>Through the revision of the information above and the interpretation of the positive trends showed by the Portuguese forest regarding the sequester of carbon, the risk for this indicator is considered as low.</p>
<p>Means of Verification</p>	<p>Maps, WebPages Procedures and records Regional, publicly available data from a credible third party The existence of a strong legal framework in the region Interviews with experts</p>
<p>Evidence Reviewed</p>	<p>[1] http://www.inia.pt/fotos/editor2/5_solo_estrategia_nacional_alberto_gomes.pdf</p> <p>[2] http://www.icnf.pt/portal/florestas/ifn/resource/ficheiros/ifn/ifn6-res-prelimv1-1</p> <p>[3] http://www.tcontas.pt/pt/actos/rel_auditoria/2012/2s/audit-dgtrc-rel035-2012-2s.pdf</p>

	<p>[4] National Report on the Implementation of Habitats Directive 2013 http://cdr.eionet.europa.eu/Converters/run_conversion?file=pt/eu/art17/envuc2hfw/PT_habitats_reports.xml&conv=350&source=remote</p> <p>United Nation Framework on Climate Change, National Inventory Submissions 2017, https://unfccc.int/national_reports/annex_i_ghg_inventories/national_inventories_submissions/items/10116.php</p>
<p>Risk Rating</p>	<p> <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA </p>

	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	<p>Additionally, to the references on 2.9.1.</p> <p>It was found on information reviewed that according to National Inventory (APA, I.P., 2014), from 1990 to 2012 forests are a net carbon sink, with annual sequestration values ranging between -11 MtCO eq and -18 MtCO eq.</p> <p>However, on its 2015 report it is stated the negative impact of forest fires (..) Estimates of emissions and sinks from land use change and forestry category show that this category has changed from being a net emitter in 1990 (1.8 Mt CO2 eq.) to a carbon sink in 1992. This situation was again reverted in the years 2003 and 2005 due to the severe forest wildfires events registered in these years. In 2013 this sector represents a sequester of - 9.4 MtCO2e.</p> <p>Questions regarding forest fires are addressed at indicators 2.4.1 and 2.4.2. Under this information this indicator can be assessed at low risk.</p>
Means of Verification	<p>Results of analysis</p> <p>Regional, publicly available data from a credible third party</p> <p>The existence of a strong legal framework in the region.</p> <p>Interviews with experts</p>
Evidence Reviewed	<p>Estrategia Nacional das Florestas (RCM n.º 6-B/2015 - Diário da República n.º24/2015, 1º Suplemento, Série I de 2015-02-04);</p> <p>ICNF portal (http://www.icnf.pt/portal/icnf/docref/enf)</p> <p>Relatório-de-Characterização-da-FiLawra-Florestal-2014 http://www.aiff.org.pt/assets/Relatorio-de-Characterizacao-da-FiLawra-Florestal-2014-160p-CAPA-3-spread....pdf)</p> <p>Portuguese National Inventory Report on Greenhouse Gases 1990 – 2013 http://www.apambiente.pt/_zdata/Inventario/NIR_global_20151030_UNFCCC.pdf</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.10.1	Genetically modified trees are not used.
Finding	<p>In Portugal there is not a specific legal framework for GMO trees, but for all vascular plants. This legislation doesn't prohibit commercial use of GMO plants which is legal in the country since 1999. However, only corn (maize) is cultivated (around 6% of the total production).</p> <p>It hasn't been found any recent trial of GM trees in the country. Only related notice was from 1997 when Stora Enso trialed a modified variety of Eucalyptus globulus, which was concluded on 2001.</p> <p>The company (Stora Enso) is no longer in Portugal, but is still an industrial global pulp and paper player with interests in GMO.</p> <p>A low risk conclusion is justified because it was not evidenced interest for GMO use in the forestry sector.</p>
Means of Verification	<p>List of species used.</p> <p>EU Register of authorised GMOs http://ec.europa.eu/food/dyna/gm_register/index_en.cfm</p>
Evidence Reviewed	<ul style="list-style-type: none"> •DL 55/2015 at 17/04 http://apambiente.pt/_zdata/Politicar/MGM/DL%2055_2015.pdf •DL 72/2003 de 10/04 (http://apambiente.pt/_zdata/Politicar/OGM/DL_72_2003.pdf) •APA-Agência Portuguesa de Ambiente at webpage: http://apambiente.pt/index.php?ref=16&subref=85&sub2ref=430 •DGAV- Direcção Geral de Alimentação e Veterinária webpage: http://www.dgv.minagricultura.pt/portal/page/portal/DGV/genericos?generico=3665233&cboui=3665233 •Plataforma Transgénicos Fora at http://stopogm.net/ensaios •EU Register of authorised GMOs http://ec.europa.eu/food/dyna/gm_register/index_en.cfm •Global Forest Registry: http://www.globalforestregistry.org/
Risk Rating	<p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>

Annex 2: Stakeholder consultation comments

Hereby, the written comments submitted by NEPcon and SBP's external reviewer are presents.

NEPcon has presented the comments directly on the draft NRA. This is a transcription of the sentences or indicators commented:

Indicator	Draft RRA v6.0	Comments
1.1.2	On the above background, the risk related to the traceability of feedstock back to the supply base is evaluated to be specified due to the lack of compliance of forest operators in delivering the mandatory Felling Manifest for other species other than coniferous.	From the text above it is not clear that the only document which clearly link the material back to the forest stand is the felling manifest. There is number of documents mentioned but the level of assurance that the material can be traced back to the stand is not clear.
1.2.1	Real Estate Cadastre...	Not clear if/how this is applicable to forestry
1.2.1	Conservatory of the land registry...	This section seems to be about buildings, not very relevant for forestry, unless the land is not part of the building
1.3.1	Since the scope of this National Risk Assessment is the primary feedstock of raw material originating in Portuguese Mainland, the EUTR requirements are not applicable, since they aim to verify the legality of imported wood to the EU market.	EUTR covers also wood placed to EU market from EU forest.
1.4.1	Income Taxes (IRS & IRC)	There is no information about if there is any analyses of how much wood is sold without invoice and thus avoiding to pay a tax.
2.1.1	Risk Conclusion HCV1: The identification of precise HCV attributes might not fall under the scope of these assessments, so specified risk is considered.	Not sure this makes any sense
2.1.1	Risk Conclusion HCV3	From the description below it is not clear why this is specified risk and what kind of stands or areas are the most vulnerable
2.1.3	The definition of natural forest...	Why natural forest definition is mentioned in the RA? There is no reason for that as the indicator works with forest to planation

2.1.3	<ul style="list-style-type: none"> - Conversion of forest cover is possible in Portugal, although previous authorization by ICNF is mandatory. - Several legal mechanisms and monitoring practices are put in place in order to control forestry activities in sensitive areas, comprising protected tree species. - The exotic tree species most relevant in Portugal is the Eucalyptus Globulus as is described above. The area of Eucalyptus settlements is constrained and thereby, conversions from other species will not be possible. - The change of land use is limited. 	<p>How any of these assure that biomass will not contain any material from converted plantations or that the wood is not extracted from sites that will be converted to to plantations after the harvest?</p>
2.2.6	<p>PROF, in some regions, also defines a maximum threshold for clear cutting of 10ha.</p>	<p>In Portuguese implemented legislation there is not a clear and effective legal tool over all territory, being exceptions the Northern regions, where 10 hectares is defined as the maximum clearcuttings area as defined on Regional Forest Plans. Also some Municipalities may have municipal regulations about clearcutting fellings. So it is considered there are specified risks that feedstock is sourced from forests when clear cuttings are done over a specific size area. This specific area is defined regionally by each Regional Forest Plan (PROF), as the maximum clearcutting area or the size of even aged monoespecific forest stand.</p>
2.3.2	<p>The risk for this indicator is assessed as specified.</p>	<p>There is missing justification for the specified risk in this indicator</p>
2.4.1		<p>It would be good to consider also the Statistics from IFN5 (last complete inventory data available) shows that percentage of heavy damaged trees have increased from 1995 to 2005:</p> <p>Pinus pinaster. From 7% of trees with heavy damage in 1995 to 11% in 2005. Pinus pinea. From 2% to 7%. Eucalyptus. From 4% to 11%</p>

2.5.1		<p>The finding seems not to address the customary right to entry inside forest properties, and even the recollection of private natural resources of free use like mushrooms or aromatic plants. This customary right does not include licensed fenced properties for cattle or big game hunting zones.</p> <p>The rights of recollection of mushrooms, aromatic and medicinal plants still have a lack in legislation as 2009 Forest Code was revoked on 2012. This Code was giving more rights for these natural resources to land owners. Conflicts may exist between land owners rights based on the private right defense against the customary rights of accessing and free use recollection, as no specific legislation was updated about this issue.</p> <p>These conflicts may become more relevant where resources are easy to steal, like pine cones or other NTFP-Non Timber Forest Products.</p>
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SBP External Consultant:

Indicator No.	Comment
1.1.2	<p>Despite the fact that Portugal has legislation in order to traced back the feedstock, like the ones that are correctly described in the RRA, it is verified a lack of application of the harvesting manifest (described as felling manifest in RRA), since there is not a proper verification by ICNF in order to demand that all forest producers deliver the harvesting manifest. This means that right know there is a low percentage of forest producer that are delivering the harvesting manifest specially the small forest owners, leading to a failure in the application of this legal requirement. That situation has particular importance for this indicator since it is the harvesting manifest the document that has the geographical information about the harvested area.</p> <p>In order to prevent the lack of delivering of the harvesting manifest by forest producers, the biomass producer shall ensure that every load of wood must have associated (up to 30 days after the end of the harvesting) a harvesting manifest.</p> <p>The risk for this indicator should be classified has Specified Risk.</p>
1.2.1	<p>Portugal has a problem related with the geometric cadastre of the rural real estate that only covers 53% of the country, which is already identified in the RRA. Portuguese government is trying to fix this problem and is working on new legislation specific to address this issue. RRA has addressed this problem correctly but in fact there is a risk related with this indicator for the areas where there is no official information about the legal ownership, so additional measures should be taken by the biomass producer for those cases by using the legal instruments described in the RRA.</p> <p>The risk for this indicator should be classified has Specified Risk.</p>
1.4.1	<p>The Portuguese forest sector is characterized by a chain mostly composed by three stakeholders, the forest producer that sells the wood to a logger which by his side sells the wood to the industry. The business between the industry and the logger is well defined and there is no risk in this part of the chain, but the business between the forest producer and the logger has some risk related to tax evasion. The truth is that some of that business are made without and invoice or with only an invoice for part of the wood, meaning that less taxes will be paid and with that it will be possible to have a better price for the wood, both for loggers and for forest producer. Portugal has some mechanisms in</p>

	<p>order to prevent this situation to happen, like the obligation in issuing a AT code (code from finances) for the transportation of each load, but most of the times the wood transportation is made by the logger meaning that that mechanism is not effective for these situations. In order to prevent that to happen the biomass producer should control that an invoice has been issued between the forest producer and the logger for each load. The risk for this indicator should be classified has Specified Risk.</p>
2.1.1	<p>It is important to highlight that a demanding by the biomass producer of an environmental impact assessment before each harvesting should be taken into account as a mitigation measure for this indicator, as well as controlling if the forest producer submitted a RJAAR after a final harvesting.</p>
2.1.2	<p>There were not defined any mitigation measures for this indicator. As possible mitigation measures, as highlighted for indicator 2.1.1, the biomass producer should demand an environmental impact assessment before each harvesting, as well as controlling if the forest producer submitted a RJAAR after a final harvesting.</p>
2.1.3	<p>Portuguese legislation defines that every reforestation must be previously authorized by ICNF, as it was explained in RRA, meaning that all Portuguese natural or semi natural forest is “protected” from conversions. This legislation was made in 2013 and it called RJAAR, before 2013 almost all natural and semi natural forest in Portugal was included in protected areas which means that those forests were protected by law. There is also a legislation demanding that if there is a big area that will be planted, an environmental impact assessment must be done, and only after the result of that assessment the planting is authorized, and if necessary mitigation measures are defined. There will also be a change in legislation regarding the plantation of Eucalyptus since the Portuguese government doesn´t want that the Eucalyptus area growth in Portugal. Despite all the legislation that covers this issue, there is a problem related with new plantation in Portugal, since there are still a lot of illegal forest plantations in Portugal, specially related with small forest owners where there are cases where forest plantations are made without a RJAAR authorization. With the probable future change to the legislation regarding the limitations in doing new Eucalyptus plantations, the percentage of illegal plantations may growth and many times those plantations are made in rural and isolated places where it is hard for Portuguese authorities to control.</p> <p>In order to prevent that to happen in the future, after a final harvesting is done, the biomass producer should control if there is a RJAAR for the harvested area in order to prevent illegal plantations to happen. Due to the silvicultural model applied for Eucalyptus this will be applied only were a final harvesting is made, so the biomass producer should also control if the load that enters in the factory is coming from a final harvesting or not. The risk for this indicator should be classified has Specified Risk.</p>
2.2.1	<p>There were not defined any mitigation measures for this indicator. As possible mitigation measures, as highlighted for indicator 2.1.1, the biomass producer should demand an environmental impact assessment before each harvesting, as well as controlling if the forest producer submitted a RJAAR after a final harvesting, where planning is defined.</p>
2.2.2	<p>In Portuguese forest sector it is commonly seen bad practices regarding soil preparation usually before plantations, leading to a higher risk of erosion and also to a lower soil productivity. Despite that, there is an improvement regarding this issue, including a better control by ICNF in order to prevent these practices to happen, by not approving any RJAAR when a bad soil preparation is described when a forest owner submits a RJAAR for approval. The problem in these situations is where illegal plantations are made, as it was addressed in the comments to indicator 2.1.3, in which authorities doesn´t have any control in the practices used by forest producers. There is also another situation regarding soil protection that it is not predicted in Portuguese legislation, since it is not mandatory to do environmental impact assessments before each operation, especially for small forest owners, so many times mitigation measures are not defined resulting in soil impacts.</p> <p>In order to improve soil protection from forest activities, the biomass producer should control if there is a RJAAR for each new plantation (as explained in indicator 2.1.3), and should also demand an environmental impact assessment for every harvesting in order to prevent impacts on the soil resulting from these operations. The risk for this indicator should be classified has Specified Risk.</p>

2.2.3	<p>The risk assessment for this indicator was correctly done by the WB, but it is important to include in the indicator that Portuguese legislation doesn't demands EIAs for small areas, as described in indicator 2.1.2 and 2.2.1.</p> <p>The WB has also not defined any mitigation measure for this indicator. As possible mitigation measures, as highlighted for indicator 2.1.1, the biomass producer should demand an environmental impact assessment before each harvesting, as well as controlling if the forest producer submitted a RJAAR after a final harvesting.</p>
2.2.4	<p>The mitigation measures for this indicator should be the same as the ones described for indicators 2.1.1, 2.1.2, 2.2.1 and also 2.2.3.</p>
2.2.5	<p>Portugal is facing a problem with a pine nematode disease which has reduced substantially the Pine area in Portugal. In order to prevent the spread of the disease it was created a legislation which defines mitigation measures when Pine stands are harvested, including the obligatory in delivery a nematode manifest to ICNF. That manifest in some cases (depending of the time of the year and also depending on the region in which the Pine is being harvested), defines additional measures that have to be taken into account both during transportation of the product and also regarding the way how Pine forest wastes are processed. Portuguese authorities are actively controlling if a manifest is issued for every Pine that is harvested, but it is commonly detected failures in controlling if the mitigation measures are being applied when necessary.</p> <p>In order to address this issue, the biomass producer should control if there is the need in applying mitigation measures for the Pine loads and control if those mitigation measures are being applied regarding Pine forest wastes.</p> <p>The risk for this indicator should be classified has Specified Risk.</p>
2.2.6	<p>Portugal has appropriate legislation in order to protect water resources, including the obligation in performing and environmental impact assessment for big areas, as described in the RRA, and also for new plantation where when a RJAAR is issued ICNF defines measures to protect water resources. But as described in the comments to indicator 2.2.2 there is the problem of illegal plantations where there is the risk in causing impacts in water resources, and also it is not mandatory by law to perform environmental impact assessments for small areas for each operation leading to a higher risk of causing impacts in water resources since mitigation measures are not defines.</p> <p>In order to prevent impacts on water resources resulting from forest activities, the biomass producer should control if there is a RJAAR for each new plantation (as explained in indicator 2.1.3), and should also demand an environmental impact assessment for every harvesting in order to prevent impacts on the water resources, resulting from these operations.</p> <p>The risk for this indicator should be classified has Specified Risk.</p>
2.3.1	<p>The analysis done by the WB for this requirement was made with bases of the national forest inventory at a national level, but in fact at a stand level there is some forest producers that harvest Eucalyptus stands before the appropriate harvesting time not following the best practices and the silvicultural models defined by the PROF for each region. This is a situation that happens due to several reasons, first because forest producers want revenue from the stands as fast as possible, and also because most of the times they doesn't have the appropriate knowledge to understand that the stand have not reached to the optimal production level. In fact there is a small window where a forest producer is allowed to harvest the Eucalyptus by law, but the stand has not reached its optimal production according to the correct silvicultural model yet. In order to prevent those situations to happen, biomass producers should ensure that forest producers follow the appropriate silvicultural models for Eucalyptus stands. This is a situation that affects only a small part of the wood used to make pellets, since most of the used raw material is coming from Pine wood.</p> <p>The risk for this indicator should not be raised to Specified Risk, but a remark should be done about this issue.</p>
2.3.2	<p>It is also important to highlight that Portugal has a bad historic regarding agricultural/forestry working related accidents, most of them are related with lack of training by workers. Despite the all options described in the indicator regarding technical</p>

	training to workers, it is commonly verified that most of the workers doesn't have the minimum training hours predicted in the Portuguese working code (35 hours).
2.4.2	<p>The risk assessment for this indicator was correctly done by the WB, but there is important information missing from the indicator, related with forest fires and also pests and diseases. Regarding forest fires, Portugal has a big problem with forest fires where the worst of them happened in the current year, one of the causes of this problem is the lack of implementation of fire management tracks during forest plantation, this is an issue resulting from illegal plantations specially with small forest owners, in which a RJAAR is not submitted to ICNF and ICNF cannot control if the forest management tracks are being respected in new plantations.</p> <p>In order to address this issue, the biomass producer should control if after a final harvesting a RJAAR is submitted to ICNF by the forest producer.</p> <p>Regarding pests and diseases, Portugal is having a problem with a pine nematode disease which has reduced substantially the Pine area in Portugal, as was described in the comments to indicator 2.2.5.</p> <p>In order to address this issue, the biomass producer should control if there is the need in applying mitigation measures for the Pine loads and control if those mitigation measures are being applied.</p>
2.5.1	<p>It is important to include in the indicator that there are some traditional rights that should be safeguarded including for bee keepers, hunters and shepherds.</p> <p>The risk for this indicator should remain as low risk.</p>
2.7.2	<p>. It is important to highlight that Portugal has some problem related with illegal working in agricultural sector, but those problems were not detected in forest sector, the main problems related with conditions at work in forest operations are highlighted in comments for indicator 2.8.1.</p>
2.7.5	<p>. It is important to highlight that Portugal has some problem related with illegal working in agricultural sector, but those problems were not detected in forest sector, the main problems related with conditions at work in forest operations are highlighted in comments for indicator 2.8.1.</p>
2.8.1	<p>The risk assessment for this indicator was correctly done by the WB, but as it was commented in indicator 2.3.2, Portugal has a bad historic regarding agricultural/forestry working related accidents. There are several causes for those accidents, usually they are related with the lack of training that leads to a lack of use of proper PPEs, a lack of respect of safety distances and also lack of training in H&S.</p> <p>Despite the WB has defined this indicator as Specified Risk, it was not defined any mitigation measures. In order to mitigate the risk in this indicator, the biomass producer should have proper means to control if workers have the proper training and if all safety measures are being respect during forest operations, including the use of PPEs, safety distances, work insurance and aptitude forms.</p>
2.9.1	<p>. It is important to highlight for this indicator that the planning instrument that predicts changes in the land use is the Municipal Land-use planning (PDM), which limits and defines the changes that can be done to the land use.</p>

Annex 3: List of identified key stakeholders

Organization	Type	Working Group Meeting	Contributions outside the public consultation framework	Written comments within public consultation
A Mata-Associação de Produtores Florestais do Concelho de Alijó	Forest Owners Association			
Abastena - Soc. Abastecedora de Madeira, Lda.	Wood supplier and Forest Management Group			
ACEB - Associação para a Cooperação entre Baldios	Forest Owners Association			
ACHAR- Associação de Agricultores de Charneca	Forest Owners Association			
Acrécimo	Forest NGO			
ACT- Autoridade para as Condições do Trabalho	Public entity responsible for work conditions		Yes	
ADEFM - Associação de Defesa da Floresta do Minho	Forest Owners Association			
AFLOBEI - Associação de Produtores Florestais da Beira Interior	Forest Owners Association			
Afloeste - associação Interprofissional da Floresta do Oeste	Forest Owners Association			
AFLOTM - Associação Florestal Terras de Montanha	Forest Owners Association			
AFTM - Associação Florestal de Trás-os-Montes	Forest Owners Association			
Agência de Energia do Porto	Energy Agency			
AGRESTA - Associação dos Agricultores do Minho	Forest Owners Association			
Agueira Florestal, Lda.	Wood supplier and Forest Management Group			
AIFF - ASSOCIAÇÃO PARA A COMPETIVIDADE DA INDÚSTRIA DA FILEIRA FLORESTAL	Forest based industry association			

AIMMP- Associação das Indústrias de Madeira e Mobiliário de Portugal	Forest based industry association			
Albano Leite da Silva, Lda.	Wood supplier			
ALTO DA BROCA – Associação de Produtores Florestais	Forest Owners Association			
ALTRI Florestal SA	Paper and pulp industry	Yes	Yes	
Alves & Filhos, Lda.	Wood supplier			
Ambiodiv- Valor Natural	Biodiversity Management Consultant			
ANAFRE - Associação Nacional de Freguesias	National Villages association	Yes		
ANEFA - Associação Nacional de Empreiteiros Florestais e Agrícolas	Forest services providers association	Yes	Yes	
ANIA - Associação Ambiental	Environmental NGO			
ANSUB- Associação de Produtores Florestais do Vale do Sado	Forest Owners Association			
APAS Floresta- Associação de Produtores Florestais	Forest Owners Association			
APCER	Certification Body	Yes		
APCOR - Associação Portuguesa de Cortiça	Forest based industry association			
APFC – Associação dos Produtores Florestais do Concelho de Coruche e limítrofes	Forest Owners Association			
APFCAN - Associação de Produtores Florestais dos Concelhos de Alcobaca e Nazaré	Forest Owners Association			
APREN – Associação de Energias renováveis	Renewable Energy Association			
APROFFAL – Associação de Produtores Florestais de Fornos de Algodres	Forest Owners Association			
ARBOREA - Associação Agro-Florestal e Ambiental da Terra Fria Transmontana	Forest Owners Association			

ASPAFLOBAL - Associação dos Produtores do Barlavento Algarvio	Forest Owners Association			
Associação Ambiental Zero	Environmental NGO		Yes	
Associação de Produtores Florestais das Serras da Lapa e Dão	Forest Owners Association			
Associação de Produtores Florestais do Vale do Minho	Forest Owners Association			
Associação de Produtores Florestais e Agrícolas do Concelho de Proença-a-Nova	Forest Owners Association			
Associação dos Produtores Agro-florestais da Região de Ponte de Sor	Forest Owners Association			
Associação Florestal do Concelho de Ansião	Forest Owners Association			
Associação Florestal do Lima	Forest Owners Association			
Associação Florestal do Vale do Sousa	Forest Owners Association			
Associação para a Certificação Florestal do Baixo Vouga	Forest Owners Association			
Associação para a Certificação Florestal do Minho-Lima	Forest Owners Association			
Associação Transumância e Natureza	Environmental NGO			
BALADI – Federação Nacional de Baldios	Community forest areas association			
Bosque do Conhecimento	Forest services provider			
Câmara Municipal da Sertã	Municipality			
Câmara Municipal de Mação	Municipality			
Câmara Municipal de Vouzela	Municipality			
CAP - Confederação dos Agricultores de Portugal	Forest Owners Association			
CAPOLIB- Cooperativa Agrícola de Boticas	Forest Owners Association			

Carla Leite	Researcher			
Casa do Agricultor COOPERBASTO	Forest Owners Association			
Castanea Sativa Lda.	Certification Body			
CAULE – Associação Florestal da Beira Serra	Forest Owners Association			
CELPA - Associação das Indústrias Papeleiras	Forest based industry association	Yes		
Centro da Biomassa para a Energia	Research Centre			
Centro de Formação Profissional das Indústrias de Madeira e Mobiliário	Wood industry training centre			
Centro PINUS	Pine wood centre		Yes	
CERTIS - Controlo e Certificação, Lda	Certification Body			
CINCORK - Centro de Formação Profissional da Indústria de Cortiça	Wood industry training centre			
CMLisboa	Municipality			
CNA - Confederação Nacional de Agricultura	Forest Owners Association			
COFAFE, C.R.L.- Cooperativa dos Produtores Agrícolas de Fafe	Forest Owners Association			
Comissão de Coordenação e Desenvolvimento Regional de Lisboa e Vale do Tejo	Regional Development Commission			
Comissão de Coordenação e Desenvolvimento Regional do Alentejo	Regional Development Commission			
Comissão de Coordenação e Desenvolvimento Regional do Norte	Regional Development Commission			
Companhia das Lezírias	Forest Owner			
CONFAGRI - Confederação Nacional das Cooperativas Agrícolas e do Crédito Agrícola de Portugal, CCRL	Forest Owners Association			
Conselho da Fileira Florestal Portuguesa/PEFC	Sustainable Forest Management Scheme	Yes		

Costa & Irmãos	Forest Based Industry			
Dão Flora - Associação de Produtores Florestais	Forest Owners Association			
David Ribeiro & Antunes, S.A.	Wood supplier			
DEM Universidade de Coimbra	University			
Departamento de Ambiente e Ordenamento , Universidade de Aveiro	University			
DG Território	Public Authority			
DGADR -Direcção Geral de Agricultura e Desenvolvimento Rural	Public Authority	Yes		
Direção-Geral do Património Cultural	Public Authority			
Dong	Energy Producer			
DRAX	Energy Producer			
Empev - Gestão de Espaços Verdes Lda.	Forest Service Provider			
ESAC	University			
Escola Superior Agrária do Instituto Politécnico de Viana do Castelo	University			
Escola Superior de Agronomia de Coimbra	University			
Faculdade de Engenharia Universidade de Coimbra	University			
Federação Nacional das Associações de Proprietários Florestais	Forest Owners Association			
Federação Nacional de Baldios	Community forest areas association			
FENAFLORESTA - Federação Nacional das Cooperativas de Produtos Florestais, FCRL	Forest Owners Association			
Fernando Fernandes & Irmão, Lda.	Forest Service Provider			
Floresta Atlântica	Forest Investment Funds Manager			
Floresta Jovem, Lda.	Forest Service Provider			

Forestfin - Florestas e Afins, Soc. Unipessoal, Lda.	Forest Service Provider			
FORESTIS - Associação Florestal de Portugal	Forest Association			
Fórum Florestal	Forest Association			
FSC Portugal - Associação para uma Gestão Florestal Responsável	Sustainable Forest Management Scheme	Yes	Yes	
FTP Energia	Energy Producer			
Gabinete do Secretário de Estado das Florestas e Desenvolvimento Rural	Public Authority			
Gabinete Ministro Agricultura Florestas e Desenvolvimento Rural	Public Authority			
Gatões & Filhos, Lda.	Wood supplier			
GESFLORESTA- Consultoria, Ld. ^a	Forest consultant			
GIFF SA- Gestão Integrada de Fogos Florestais S.A.	Forest Service Provider			
Giovanni de Alencastro	Forest consultant		Yes	
Henri e Filhos, SA				
HRV	Equipment Supplier			
IberFlorestal - Comércio e Serviços, SA	Wood supplier			
ICNF IP-Instituto de Conservação da Natureza e das Florestas	Public Authority	Yes		
INE- Instituto Nacional de Estatística, I.P.	Public Institute			
INIAV I.P.-Instituto Nacional de Investigação Agrária e Veterinária	Public Institute	Yes		
Instituto Politecnico de Beja/Escola Superior Agrária	University			
Instituto Politécnico de Portalegre/Escola Superior Agrária de Elvas	University			
IPAC - Instituto Português de Acreditação	Certification Body			
IPB	University			
ISA Universidade de Lisboa	University	Yes		

IST - Instituto Superior Técnico	University			
Lenhotec	Forest consultant			
Liga Protecção da Natureza	Environmental NGO			
LNEC	Public Institute			
M. Cardoso Correia & Filhos, Lda.	Wood supplier			
Madeicampo, Lda.	Forest Service Provider			
Madeiras Afonso, Lda.	Wood Supplier			
Madeiras Leal de Lucídio Fernandes Lopes	Wood Supplier			
Madeiras Sto Ovídio - Magalhães & Magalhães, Lda.	Wood Supplier			
Marques Britas	Wood Supplier			
Martos & Cª, Lda.	Wood Supplier			
METACORTEX- Consultoria e Modulação de Recursos Naturais SA	Forest Consultant			
MICOFLORA - Micologia Florestal Aplicada, S.A.	Research Centre			
NEPCon	Certification Body			Yes
Norpinho, Lda.	Wood Supplier			
Óscar Soares & Filhos, S.A.	Wood Supplier			
Paula Nunes da Silva, unip, Lda	Forest consultant			
Pinus Verde - Associação de desenvolvimento Integrado da Floresta	Forest Association			
QUERCUS - Organização Não Governamental de Ambiente	Environmental NGO	Yes		
RAIZ - Instituto de investigação da Floresta e Papel	Research Centre	Yes		
RESIPINUS- Associação de Destiladores e Exploradores de Resina	Forest based industry association			
RIBAFLO - Associação Florestal das Terras de Ribadouro	Forest Owners Association			
Rita Ferreira	Forest consultant			

Rita OOM	Forest consultant	Yes		
Sandra Carreira Unipessoal,LDA	Forest consultant			
SATIVA- Controlo e Certificação de Produtos	Certification Body			
Serração de Parada, Lda.	Wood Supplier			
Serração dos Moutados, Lda.	Wood Supplier			
Serração Reis, Lda.	Wood supplier			
Serviço de Protecção da Natureza e Ambiente da GNR	Public Authority			
SETAA - Sindicato da Agricultura Alimentação e Florestas	Forest Workers Union			
SF – Associação de Serviços Florestais da Região Centro	Forest Service Provider Association			
SGS ICS	Certification Body	Yes		
Smartforest	Forest consultant	Yes	Yes	
Sociedade Industrial Duartes, Lda.				
Sonae Arauco	Forest Based Industry	Yes		
Susana Brigido	Forest consultant	Yes	Yes	
Terra Team	Forest Management Services			
thenavigatorcompany.com	Forest Based Industry	Yes	Yes	
UNAC -União da Floresta Mediterrânica	Forest Association			
UNIMADEIRAS - PRODUÇÃO, COMÉRCIO E EXPLORAÇÃO FLORESTAL, S.A.	Wood Supplier			
Universidade Católica do Porto	University			
Universidade de Coimbra	University			
Universidade de Évora	University			
Universidade Nova de Lisboa	University			
UTAD	University			
VESSADAS - Associação para o Desenvolvimento Agrícola e Rural das terras de Coura	Forest Owners Association			

Viver Serra -Associação para a protecção e o Desenvolvimento das Serras do Barlavento Algarvio	Environmental NGO			
Woodser, Lda.	Wood Supplier			
WWF- European Policy Office Branch Office	Environmental NGO			