

Supply Base Report: Forestal Soliva SL

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Completed in accordance with the Supply Base Report Template Version 1.3

*For further information on the SBP Framework and to view the full set of documentation see
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1 Overview

Producer name: Forestal Soliva SL
 Producer location: Ctra. De Sils nº 109, 17430 Sta, Coloma de Farners, GIRONA
 Geographic position: 41.853734, 2.681772
 Primary contact: Laura Ivorra Revelles; Ctra. de Sils nº 109, 17430 Santa Coloma de Farners, Girona-SPAIN; M +34 650 93 54 07; T +34 972 84 31 78; livorra@forestalsoliva.com
 Company website: www.forestalsoliva.com
 Date report finalised: 06/05/2019
 Close of last CB audit: Girona 10-05-2019
 Name of CB: Control Union BV
 Translations from English: Spanish
 SBP Standard(s) used: Standard 1 version 1.0,
 Standard 2 version 1.0,
 Standard 4 version 1.0,
 Standard 5 version 1.0
 Weblink to Standard(s) used: <https://sbp-cert.org/documents/standards-documents/standards>
 SBP Endorsed Regional Risk Assessment: not available
 Weblink to SBE on Company website: www.forestalsoliva.com

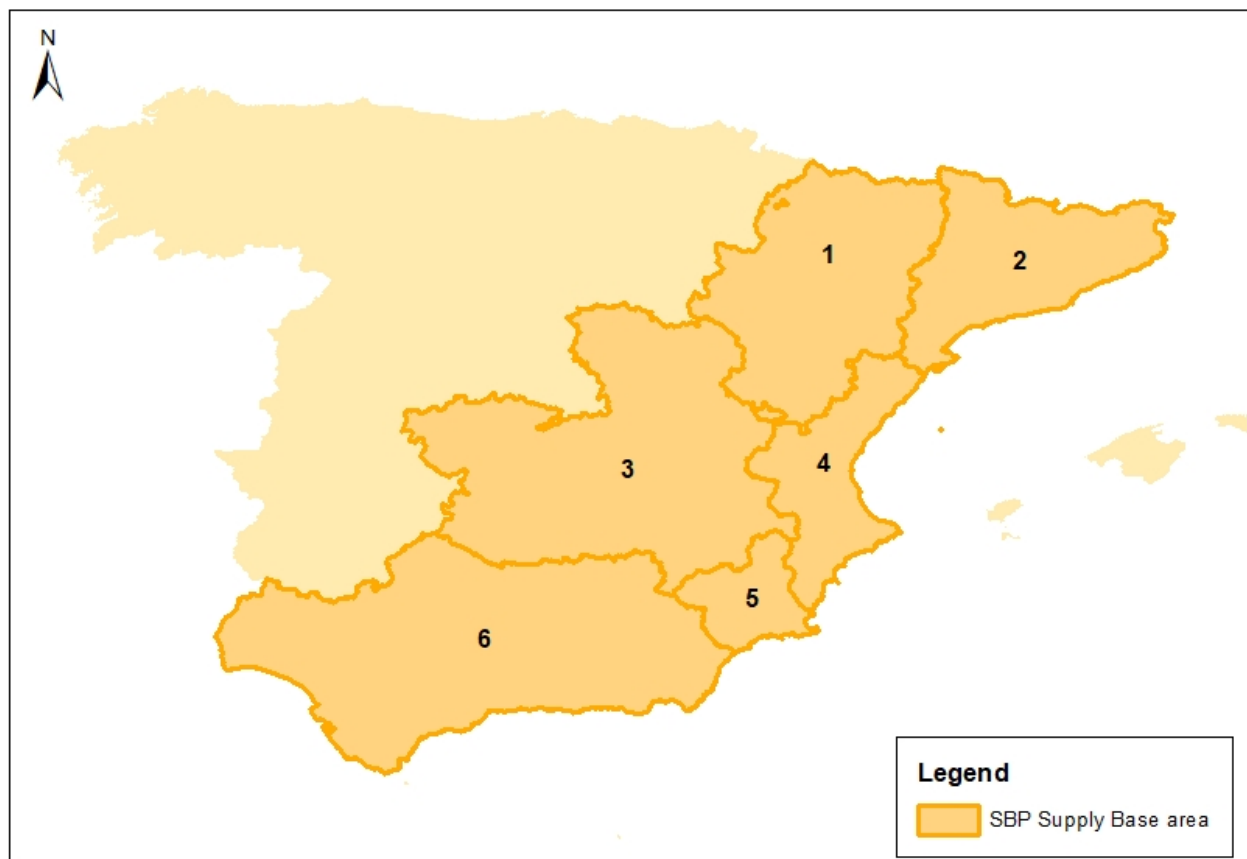
Indicate how the current evaluation fits within the cycle of Supply Base Evaluations				
Main (Initial) Evaluation	First Surveillance	Second Surveillance	Third Surveillance	Fourth Surveillance
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2 Description of the Supply Base

2.1 General description

Forestal Soliva SL is a biomass producer located in Catalunya and performing harvesting operations in Spain. The company defined six Autonomous Communities as its Supply Base:

1. Aragon
2. Catalunya
3. Castilla-La Mancha
4. Valencian Community
5. Murcia
6. Andalusia



Forestal Soliva is a 70 years old, vertically integrated company specialised in the production and delivery of wood chips. It has a multidisciplinary staff of around 30 people. Its harvesting teams are equipped with forwarders, skidders, forestry tractors and chipping machines. Forestal Soliva has a team of engineers, responsible for the technical processes in the company. They are organizing the harvesting, chipping and transportation processes. Forestal Soliva is mainly engaged in thinnings with the following objectives: forest maintenance, improvement, sanitary solutions, fire protection, etc. In total, Forestal Soliva harvests over

100 000 tons of wood per year. Regionally, Forestal Soliva is considered a large company in the forest sector, in terms of economic turnover and the production of G100 wood chips (industrial quality). However, Forestal Soliva is not the largest in the region, there are companies harvesting much more. In Andalusia there are many companies with a vertically integrated process from harvesting, to sawn wood production. They utilize their own residues, for example, by producing wood pellets.

Country level description of the Supply base

Spain has approximately 27.7 million ha of forests and woodlands, representing 56% of total land cover. Of this area 18.0 million ha is considered 'Forested land' (36%) and 9.5 million (19%) falls in the category of 'Other wooded land'. Of the forested land, approximately 90% is considered seminatural; 10% are plantations. Spain has the third highest forest cover in the European Union, after Sweden and Finland.

According to the National Forest Inventories, over 80% of forests in Spain consist two or more tree species. The most common is holm oak (which represents 15.3% of the tree covered area, around 2.8 million ha), followed by pine forests.

There are four biogeographical regions in Spain: the Boreoalpina (high mountain areas); the Eurosiberian (areas associated with the Atlantic climate), Mediterranean (the other areas of the Peninsula) and the Macaronesia region (Canary Islands). The last three regions include a varied amount of exceptional forest habitats and species.

56% of the country is covered by forest, plantations and areas with a function important for nature conservation. Of these areas 13% is protected area and reaches 28% when the Natura 2000 Network is included. Spain is the country that contributes most to the Natura 2000 Network. The protected areas cover both public and private forests.

The Forest Law (Law 43/2003, '*Ley de Montes*') forms the legislative basis for forest management in Spain. Additionally, the Autonomous Communities have their own forestry laws regulating the protection, management and harvesting of forests in their territory.

Article 33 of the Forest Law establishes the necessity for public forests and protected forest areas to have a Forest Management Plan and an Operational Scheme or another equivalent Management Instrument. These documents are elaborated by forest management units and must always be approved by the regional forestry organization. Regional forestry organizations regulate in which cases it is mandatory to have a management instrument for regular private and public forests (not catalogued as protected). Multiple laws in each Autonomous Community regulate the specific technical forestry operating constraints of forest management.

In accordance with Spanish legislation, there are three possible legal documents that prove legality of forest operations:

- Notification for harvesting (in private forests with Forest Management Plan or equivalent). The owner must notify the competent body of the Autonomous Community before harvesting;
- Authorisation for harvesting (in private forests without a Forest Management Plan). It is required to obtain the Authorisation before harvesting;

- Adjudication for harvesting (in public forests).

The three documents are evaluated by forestry technicians of the administration and enhance the legality, sustainability and respect for the environment of the requested harvesting operations. The technicians, in all three cases, make an on-site inspection of the forest to be sure of the best sustainable management of the forest. If the area of harvesting is related to any special protection function, they consult with the competent organisation to make sure that environmental aspects are respected. For example, if the harvesting is within a natural park, the technician of the natural park, can mark restrictions in the cutting permit, for example, as not to interfere with nesting of certain bird species in a certain season. The technician can also prohibit operating in certain areas.

In the case of natural catastrophes, such as forest fires, wind and snowfall damage, or pests, additional cutting authorizations can be issued to mitigate the impact. These operations aim at preventing forest pests and guaranteeing regeneration of the forest area.

According to the 2010 report of the SECF "Spanish Society of Forestry Sciences", the following characteristics of Spanish forests serve as the basis for understanding the situation in forestry today:

- The annual growth (net increment) of wood is three times higher than the amount that is cut and harvested. The increment is 45 million m³ annually and wood extraction is around 15 million m³ a year. The total annual consumption of wood is around 32 to 33 million m³; Spain imports around 15 million m³ a year. Certain aspects related to the costs of exploitation, the structure of the market for forest products, and the use of current legal, financial and administrative instruments that have become obsolete in today's society, are some of the causes of this disbalance.
- Spanish forest area is expanding, and this trend manifests itself to a greater extent than in other European countries. Spanish forests cover over half the national surface. Regarding total forest area Spain is the third country in the European Union, behind Sweden and Finland, but ahead of France, Germany, and Poland.
- The forested area per inhabitant is higher in Spain than the average in the European Union. Spain has in average 0.4 ha of forest per inhabitant, compared to 0.3 ha per inhabitant in the EU.
- Most of the Spanish forests consists of native species. Contrary to what is often mentioned in various media, the area covered by hardwood species exceeds the area covered by coniferous species.
- Spanish forests are multifunctional. Important is the protective role of forests and their ability to conserve the hydrological cycle, and biodiversity. Its production function of forest products (wood, firewood, biomass for energy, cork, resins, edible mushrooms, pinion, livestock) is not negligible either. Hunting is also practised in Spain. The role of forests related to carbon fixation and the maintenance of the landscape and its biological wealth is transcendent. Spanish forests play an important role in improving air quality and mitigating of climate change. A study carried out in the CIFOR-INIA shows that at present, Spanish forests accumulate around 87 million tons of CO₂ every year due to their growth. This means that the forests fix more than 24% of the total CO₂ emissions of Spain each year.
- The current average consumption of wood in Spain is 0.8 m³ per inhabitant, in Central Europe it is 1.5 m³ and in Northern Europe 3.0 m³. Everything indicates that Spanish consumption of wood will continue to grow and that there will be a need to extract more wood from the Spanish forests or import more from other countries. The Forestry Sector has a great potential in the creation of rural employment (unemployment is a major problem in Spain, it decreased to 14.55% of the active

population in 2018). If harvesting would increase from 15 to 30 million m³ a year, forestry employment could double, from the current 155 000 to around 300 000 jobs. The Forestry Sector has an increasing influence on rural development through forestry, hunting, recreational use and rural tourism.

- More than 2/3 of the Spanish forest area is privately owned, what must be taken into account when encouraging certain forest policies.
- Spanish forests are to a large extent abandoned. The forests are accumulating fuel biomass in excess, which increases the risk of large forest fires, and yet the use of its biomass for energy purposes is not considered an attractive business by energy companies.

Region level description of the Supply Base

In the Supply Base are Mediterranean broadleaved and conifer forests (in the south-central region), however, Forestal Soliva is mainly working in the conifer forests, mostly formed by Aleppo pine (*Pinus halepensis*).

Aleppo pine is the most common tree species in the six areas of the Supply Base. Other native tree species within the Supply Base are:

- Holm oak (*Quercus ilex*);
- Maritime pine (*Pinus pinaster*);
- Umbrella pine (*Pinus pinea*);
- Black pine (*Pinus nigra*);
- Downy oak (*Quercus humilis*);
- Cork oak (*Quercus suber*); and
- Spanish juniper (*Juniperus thunifera*).

In Spain, introduced species, such as *Eucalyptus spp.* and *Populus spp.* are allowed to use in short rotation plantations, but on a very limited scale.

Table 1 indicates the forest area, and some typical characteristics, for each Autonomous Community.

Table 1: Forest cover characteristics per Autonomous Community of the Supply Base

Autonomous Community	Forest area (ha)	Canopy-covered forest area (ha)	Coniferous forest area (ha)	Aleppo pine forest area (ha)
Andalusia	4.345.500	2.641.000	824.700	564.910
Aragon	2.615.332	1.543.465	953.440	186.508
Valencia	1.116.464	404.063	360.193	282.478
Castilla-La Mancha	3.564.779	2.739.597	1.103.669	No data
Catalunya	2.060.174	1.626.212	716.058	300.645
Murcia	486.019	289.550	260.595	232.401
TOTAL (ha)	14.188.268	9.243.887	4.218.655	-

Most of the forest area in the Supply Base is private property (table 2). The prevailing private forest property size in five of the six Autonomous Communities of the Supply Base is small. This is not an issue in the public forests. Managing and harvesting smallholdings is more time consuming and costly. In Andalusia, however, large forest properties predominate.

Table 2: Characteristics of forest properties per Autonomous Community of the Supply Base

Autonomous Community	Area covered by forests	Ownership		Prevailing property size*	
		Public	Private	Private	Public
Andalusia	50%	28%	72%	Large	Large
Aragon	55%	40%	60%	Small	Medium
Valencia	56%	34%	66%	Small	Medium
Castilla-La Mancha	45%	32%	68%	Small	Medium
Catalunya	64%	25%	75%	Small	Medium
Murcia	43%	34%	66%	Small	Medium

* Property sizes:

Large - 880 ha in average

Medium - 400 ha in average

Small - 8 ha in average

(source: Spanish Statistical Office)

The dominant use of the land is forestry. Land use is characterized by a small number of large properties and a great number of small owners.

From a socio-economic point of view, people nowadays do not depend on forests. The forest industry is also not developed well within the regions of the Supply Base, in comparison to the rest of Spain. This is mostly due to the complex macro-relief (hills, slopes and mountains), which makes forestry operations very difficult.

The proportion of wood used as biomass within the Supply Base is relatively substantial compared to other end-uses. Aleppo pine has low quality wood and is considered unsuitable by the industry. As a result, the regional forest industry procures other tree species from all over Spain and Europe. Wood pallets and boxes for the agricultural sector are the main products produced in the Supply Base. There are also some companies producing fibreboards and a few pellet plants. These companies utilize sawmill residues and low grade roundwood. This shows that there is hardly any other application for Aleppo pine than biomass.

The use of the potential wood available in Spain is very low. For example, only 36% of the net annual growth of forests is used, while the average in the EU is 69%. Another example is that in Catalonia the forests grow 2.9 million cubic meters per year, of which only 20% are used. In addition, only 10% of the annual wood consumption of forest industries comes from Catalan forests. This panorama is repeated in the 6 regions of the supply base.

Nowadays, most of the forests in the supply base are abandoned and are not managed. This is due to the low profitability of the forests because the forests are located in complicated orography and with steep slopes

(which makes their mechanization difficult), the final product (wood) is of low quality (many knots, twisted trunks, small diameters) and the forest industry produces products with little added value.

Aleppo pine wood is generally of poor quality, the forests are not managed, so the quality of the wood continues to deteriorate. The increase in biomass production (wood chips) is an excellent incentive and opportunity for the management and improvement of pine forests in these six regions.

SBP product characteristics

Forestal Soliva mainly carries out maintenance operations in Aleppo pine forest stands (around 90% of feedstock supply). The silviculture of this tree species is characterized by rotation lengths of about 100 years. Thinning should be done every 15-20 years. It should be mentioned that most of these forests are old repopulations that have been abandoned and that the relevant thinnings have not been made. Due to the fact that most of these forests have not been managed during the last decades, currently stand improvements have to be done to reduce the risk of forest fires. Stand improvement consist of practices designed to improve the quality of the remaining trees and the overall growth of the stand. Several methods can be used, such as thinnings, clearings, regeneration fellings and phytosanitary harvesting operations. Clear cuts are not permitted.

SBP-compliant primary feedstock is the only product group that Forestal Soliva focusses on and has in its scope. If the raw material does not turn out to be SBP-compliant primary feedstock, it will be physically separated.

Forestal Soliva prioritizes obtaining wood from own forest operations, so it will be able to take exhaustive control of feedstock supply. Forestal Soliva will probably work with two or three external suppliers per year.

The tree species harvested for SBP biomass production are:

- Aleppo pine (*Pinus halepensis*);
- Black pine (*Pinus nigra*);
- Umbrella pine (*Pinus pinea*);
- Maritime pine (*Pinus pinaster*);

Forestal Soliva does not harvest, nor purchase tree species listed by CITES, or IUCN.

Regarding Spain, CITES does not list any tree species. IUCN lists Common Ash (*Fraxinus excelsior*) as “Near Threatened”, and Horse Chestnut (*Aesculus hippocastanum*) as “Vulnerable”.

2.2 Actions taken to promote certification amongst feedstock suppliers

Engineers of Forestal Soliva promote FSC and PEFC certification among forest owners. They explain the benefits of becoming certified as well as the realization of forest management plans, not only from an environmental point of view, but also from an economical one. However, considering the market prices for wood, nearly all land owners consider the costs of certification unfeasible.

Forestal Soliva holds a PEFC Chain of Custody certificate (PEFC/14-38-00168-5-BVC). Forestal Soliva is member of a PEFC group certificate named 'CoC ÊFC GECBIOCAT'. The certificate activities are forest harvesting, wood production and buying and producing certified wood chips.

2.3 Final harvest sampling programme

Forestal Soliva performs only maintenance operations approved by the state authorities. Most of the forests within the supply base are in high need of maintenance operations. The operations that are being carried out focus on forest stand improvement. No case clear cuts are made. The regional administrations prefer to create uneven-aged forest stands, which are ideal to manage through continuous selective cutting. Selective cuttings secure the continuity of the carbon stock and enable natural forest regeneration.

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

Forestal Soliva Forest maintenance operations (no clear-cuts) semi-natural pine forests	Independent harvesting companies Forest maintenance operations (no clear-cuts) semi-natural pine forests
Forestal Soliva, or another company subcontracted by Forestal Soliva chips the feedstock at the harvesting site	
Forestal Soliva, or another company subcontracted by Forestal Soliva transports the wood chips to the port	
Forestal Soliva sell wood chips at port	

2.5 Quantification of the Supply Base

Supply Base

- a. Total Supply Base area (ha): 14.188.268 ha
- b. Tenure by type (ha): Privately owned: 9.724.778 ha
Public: 4.463.490 ha
- c. Forest by type (ha): 14.188.268 ha temperate;
- d. Forest by management type (ha): 14.188.268 ha managed natural
- e. Certified forest by scheme (ha): FSC: 152.787 ha
PEFC: 709.773 ha

Feedstock

- f. Total volume of Feedstock: 20.844.750 tonnes
- g. Volume of primary feedstock: 20.844.750 tonnes
- h. List percentage of primary feedstock (g), by the following categories. Subdivide by SBP-approved Forest Management Schemes:
 - Certified to an SBP-approved Forest Management Scheme: 6%
 - Not certified to an SBP-approved Forest Management Scheme: 94%
- i. List all species in primary feedstock, including scientific name.

Common name	Scientific name	Percentage
Aleppo pine	<i>Pinus halepensis</i>	90%
Umbrella pine	<i>Pinus pinea</i>	10%
Black pine	<i>Pinus nigra</i>	
Maritime pine	<i>Pinus pinaster</i>	

- j. Volume of primary feedstock from primary forest – 0 ton
- k. List percentage of primary feedstock from primary forest (j), by the following categories. Subdivide by SBP-approved Forest Management Schemes:
 - Primary feedstock from primary forest certified to an SBP-approved Forest Management Scheme: 0%
 - Primary feedstock from primary forest not certified to an SBP-approved Forest Management Scheme: 0%
- l. Volume of secondary feedstock: specify origin and type: 0 ton
- m. Volume of tertiary feedstock: 0 ton

3 Requirement for a Supply Base Evaluation

SBE completed	SBE not completed
<input checked="" type="checkbox"/>	<input type="checkbox"/>

An SBE was completed for primary feedstock supplied to the BP, because insufficient forests are FSC or PEFC certified in the Supply Base.

4 Supply Base Evaluation

4.1 Scope

The scope of SBE is:

- The Supply Base, which includes forest areas from six Autonomous Communities of Spain (Aragon, Andalusia, Catalunya, Castilla-La Mancha, Valencia, and Murcia).
- Forest maintenance operations (thinning, no clear-cuts) in semi-natural pine forests.
- Forest operations carried out in private and public forests by own harvesting teams, subcontracted teams and teams of suppliers.

4.2 Justification

The approach used in this SBE is risk assessment, according to legality and sustainability principles. The following sources of information were studied to assess the risks:

- Applicable legislation and regulations;
- Reports on other SBP projects in Spain;
- Publications of national organizations and of the Autonomous Communities,
- Publications of NGOs, e.g. the FSC National Risk Assessment (2018);
- Scientific studies;
- Mass media sources.

Besides that, the SBR and SBE were published for stakeholder consultation. Stakeholders were proactively invited to provide their comments by e-mail.

Forestal Soliva has 70 years of experience with forest management operations in the Supply Base and has consulted with international specialists on SBP certification.

4.3 Results of Risk Assessment

A few indicators showed potential risks, but Forestal Soliva had standard operational procedures in place mitigating these risks, already before the start of preparing for SBP certification.

The risk assessment identified one (3) specified risk, related to indicator 2.2.2 (The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is sourced from forests where management maintains or improves soil quality), 2.4.2 (The Biomass Producer has implemented appropriate control systems and procedures for verifying that natural processes, such as fires, pests and diseases are managed appropriately) and 2.8.1 (The BP has implemented appropriate control systems and procedures for verifying that appropriate safeguards are put in place to protect the health and safety of forest workers).

Forestal Soliva already had implemented control systems and procedures for verifying that appropriate safeguards are in place to protect health and safety during forestry operations. However, to be sure, and because this is an actual problem within the Supply Base, the indicator was categorised “specified risk”.

4.4 Results of Supplier Verification Programme

Not applicable, as there were no unspecified risks.

4.5 Conclusion

Every indicator was thoroughly studied at the level of country (Spain) and at the level of the selected Autonomous Communities. Many sources of information were used to assess each indicator, regarding the scope of this SBE.

In general, the SBE indicated:

- Laws and regulations on forestry in Spain and the Autonomous Communities within the Supply Base protect the environment well and the system of law enforcement is effective;
- The forest cover in Spain has increased with 1/3 over the last 30 years. The forests are mainly multifunctional, protected areas are well designated;
- Forestal Soliva does maintenance operations in forest stands that mostly need such operations desperately from every sustainability point of view. The ecological, economic and social impact of these operations are positive (and no clear cutting);
- Forestal Soliva uses four common, native tree species only (not protected species);
- Forestal Soliva has 70 years of experience in forest maintenance operations.

Forestal Soliva has several strengths, regarding its management system. On legality issues, the company has a strong administration system that ensures the collection of legal documentation from suppliers and subcontractors. Tax payments are verified throughout the whole supply chain, starting at the forest owner. Besides that, Code of good practices in Sustainable Forest Management is always implemented.

The analysis showed legality issues are well covered by law enforcement organisations and the company's every-day business procedures. Forestal Soliva does not start a business relationship without essential legal documentation related to the planned forest operations.

The assessment of the SBP sustainability requirements resulted in low risk evaluations, except for indicators 2.2.2, 2.4.2 and 2.8.1. Forestal Soliva has standard operational procedures and takes additional measures to mitigate these risks.

Sustainability issues related with ecological values are well managed by using Code of good practices in Sustainable Forest Management.

The team of specialists working on the SBE is confident the Biomass Producer can ensure its feedstock complies with the SBP requirements on legality and sustainability.

5 Supply Base Evaluation Process

The Supply Base Evaluation process covered:

- An extensive literature study;
- Excursions to plots where forest operations were being conducted;
- Consultations with local and international specialists, and people working within forestry;
- An open stakeholder consultation process.

The process was managed by the consulting company BiomassConsult. The project leader was Tatiana Savelyeva, who has over four years of experience in SBP. She prepared around 30 Biomass Producers, including three SBE projects in Portugal. Tatiana Savelyeva passed the SBP auditor exams in 2017. She completed forestry engineering studies in Russia, Sweden, and Finland.

Laura Ivorra is the forestry engineer at Forestal Soliva contributed greatly to the process as the expert in legality and sustainability issues specific to the Supply Base.

Two more consultants of BiomassConsult were involved in the project: Bea Groenen and Rens Hartkamp.

Bea Groenen is a specialist from Belgium, who studied forestry in the Netherlands. She has experience with biomass certification systems and with assessing PEFC national certification systems. She conducted several biomass utilization and market researches.

Rens Hartkamp is an M.Sc. in forestry and a Ph.D. in forestry economics. He has around 20 years of experience in forest management and biomass certification, criteria development, and benchmarking. His experience with SBP certification starts from the beginning of its development. He assisted around 40 companies on SBP certification, some including SBE projects.

6 Stakeholder Consultation

Around 30 stakeholders were identified and approached. Stakeholders were contacted by e-mail, providing a link to the Supply Base Report and Supply Base Evaluation.

The stakeholders were encouraged to provide contributions and comments to the SBE, within the one-month consultation period.

Also, after the consultation period, Forestal Soliva will take into consideration at the full extent any concerns about the SBE.

6.1 Response to stakeholder comments

A summary of the stakeholder comments and how they were taken into consideration will be listed here after finalization of consultation period.

Comment 1:

Good day,

We are at your disposal, for the Region of Murcia is an opportunity to promote sustainable forest management and improve the quality of forests, since most of these are currently abandoned and unmanaged for years.

Greetings.

Profomur Asociación, profomur@gmail.com

Response 1:

The comment didn't require a reply.

7 Overview of Initial Assessment of Risk

Table 7.1. Initial overview of results from the risk assessment of all Indicators.

During the initial risk assessment for the supply base, three indicators were identified as specified risk: 2.2.2 - The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is sourced from forests where management maintains or improves soil quality 2.4.2 - The Biomass Producer has implemented appropriate control systems and procedures for verifying that natural processes, such as fires, pests and diseases are managed appropriately – with regards to fires; and 2.8.1. - The Biomass Producer has implemented appropriate control systems and procedures for verifying that appropriate safeguards are put in place to protect the health and safety of forest workers.

Table 1. Overview of results from the risk assessment of all Indicators.

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

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

After analysis carried out during the SBE and considering the forest management practices implemented by Forestal Soliva and their suppliers in their everyday work, it was considered, that indicator 2.4.2 is mitigated by the standard operational procedures of Forestal Soliva. Low risk for the management of forest fires in both public and privately-owned forests is based mainly on the positive impact on fire prevention of the work carried out and the implementation by Forestal Soliva of measures to prevent fires while the work is being carried out, which normally involves forest maintenance operations with removal of salvage, presence of fire extinguishing equipment on every harvesting site, work in allowable time of the day which is announced every day by the Department of fire prevention.

For the other 2 indicators, 2.2.2 and 2.8.1, additional mitigation measures were developed that resulted in additional field control and control of legally required health and safety documentation of suppliers. During field control performed by the forest engineers in the hilly areas, risk of erosion is additionally assessed, particular suitable measures are developed and forest workers are instructed to perform them. After the harvesting it is verified how well the measures were implemented. Only measures corresponded to best forest management practices are implemented. Also, forest workers are additionally checked to wear PPE and follow health and safety legal requirements. Additionally, it was implemented that suppliers and subcontractors must provide all legally required documentation regarding health and safety (certificate of accident insurance, training records on health and safety risks, record of delivery of PPE to all workers, a positive health certificate for each worker issued by a doctor). Forestal Soliva also provides its suppliers with a copy of best forest management practices, conducts training and supervises forestry operations.

Table 2. Overview of results from the risk assessment of all Indicators after implementing of mitigation measures.

Indicator	Initial Risk Rating		
	Specified	Low	Unspecified
1.1.1		X	
1.1.2		X	
1.1.3		X	
1.2.1		X	
1.3.1		X	
1.4.1		X	
1.5.1		X	
1.6.1		X	
2.1.1		X	
2.1.2		X	
2.1.3		X	
2.2.1		X	

Indicator	Initial Risk Rating		
	Specified	Low	Unspecified
2.3.1		X	
2.3.2		X	
2.3.3		X	
2.4.1		X	
2.4.2		X	
2.4.3		X	
2.5.1		X	
2.5.2		X	
2.6.1		X	
2.7.1		X	
2.7.2		X	
2.7.3		X	

2.2.2		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	

2.7.4		X	
2.7.5		X	
2.8.1		X	
2.9.1		X	
2.9.2		X	
2.10.1		X	

8 Supplier Verification Programme

8.1 Description of the Supplier Verification Programme

N/A

8.2 Site visits

N/A

8.3 Conclusions from the Supplier Verification Programme

N/A

9 Mitigation Measures

9.1 Mitigation measures

The risk assessment identified one (1) specified risk, namely on indicator 2.8.1: *“The BP has implemented appropriate control systems and procedures for verifying that appropriate safeguards are put in place to protect the health and safety of forest workers.”*

Forestal Soliva:

- Obliges suppliers and subcontractors to provide all necessary legal documentation (certificate of accident insurance, training records on health and safety risks, record of delivery of PPE to all workers, a positive certificate for each worker issued by a doctor);
- Refuses to buy wood from suppliers that are not able to provide all necessary documentation related to health and safety requirements from its workers or subcontractors;
- Provides training to its own forest harvesting teams (obligatory);
- Provides a copy of best forest management practices, including explanations on health and safety, to the forest workers;
- Supervises own harvesting operations and the operations of suppliers on the fulfilment of the health and safety requirements. All required PPE must be used, and other protection equipment must be available onsite. A check list on different health and safety issues has been developed.

If the health and safety requirements are not fulfilled in full during a harvesting operation, the SBP-compliant claim is rejected for the feedstock coming from such operations.

9.2 Monitoring and outcomes

The forest engineer ensures the implementation of the monitoring procedure for every forest plot where SBP-compliant biomass potentially could come from. The monitoring procedure includes filling in a check list on:

- Health and Safety (a specified risk indicator);
- Legal documents (that apply to Forestal Soliva and its feedstock suppliers and subcontractors); and
- Issues related to sustainability, that need to be checked for every forest area.

If after implementation of the monitoring procedure the required legal documentation is not provided (delayed) then the feedstock is not categorized as SBP-compliant.

In case of non-compliance with Health and Safety rules by own harvesting teams, suppliers or subcontractors, the forest engineer issues a warning to the harvesting team leader. In this case, a second unannounced visit is carried out to verify if the requirements are met. In case no improvements have been made, the feedstock is not categorised as SBP-compliant. Moreover, discontinuation with the harvesting team is considered. These incidences are recorded.

10 Detailed Findings for Indicators

Findings for each Indicator are given in Annex 1, below the most important points:

1.1.1	<i>The BP Supply Base is defined and mapped</i>
Low Risk	<p>The Supply Base is limited to the official area of forest fund of six defined Autonomous Communities of Spain. The forest area in these Autonomous Communities are well mapped (inventories by the government).</p> <p>Forestal Soliva only carries out thinnings (forest maintenance and selective harvesting operations) that are approved by the Forest Service and that are not a subject to environmental impact assessments.</p> <p>Forestal Soliva harvests four common coniferous tree species only. The main tree species is Aleppo pine (<i>Pinus halepensis</i>).</p>
1.1.2	<i>Feedstock can be traced back to the defined Supply Base</i>
Low Risk	<p>In Spain, cadastral information on properties throughout the country is available. All properties have a unique cadastral reference.</p> <p>Forestal Soliva collects delivery notes for every delivery and records the inputs. These documents can be trusted in Spain, and there are no intermediate storages. The location of the plots is well described and visited by Forestal Soliva.</p> <p>One of the following documents is always collected:</p> <ul style="list-style-type: none"> • Authorization of harvesting (in private forests without Forest Management Plan, FMP); • Notification of harvesting and FMP (if available), (in private forests with FMP); • Adjudication of harvesting or contract with public authority (in public forests).
1.1.3	<i>The feedstock input profile is described and categorised by the mix of inputs</i>
Low Risk	<p>There is only one input profile: "pine wood chips".</p> <p>Forestal Soliva keeps an internal register on feedstock inputs (an Excel file).</p> <p>Forestal Soliva obtain from the port authorities daily entry reports and monthly storage reports that also include descriptions of the material entering to the port.</p>
1.2.1	<i>The BP has implemented appropriate control systems and procedures to ensure that legality of ownership and land use can be demonstrated for the Supply Base</i>
Low Risk	<p>A contract/authorization with the private owner or an agreement with a public authority is in place for every work carried out by Forestal Soliva.</p>

	<p>One of the following documents need to be available (issued by the authorities and specifying the owner):</p> <ul style="list-style-type: none"> • Authorization of harvesting; • Notification of harvesting and copy of FMP (if available); • Adjudication of harvesting or contract with public authority. <p>Cadastral data are available within all Autonomous Communities and these are checked by the authorities when issuing the required permit for operations in private forests.</p>
1.3.1	<p><i>The BP has implemented appropriate control systems and procedures to ensure that feedstock is legally harvested and supplied and is in compliance with EUTR legality requirements</i></p>
Low Risk	<p>Forestal Soliva has developed a Due Diligence System (DDS) for EUTR compliance. Key elements of the DDS are:</p> <ul style="list-style-type: none"> • Availability of authorization for Harvesting, or Forest Management Plan with notification of harvesting; • Presence of a contract with the supplier, mentioning the land owner (must be identified); • A Forestal Soliva technician coordinates chipping and transport operations to the port. • Deliveries are direct from the forest to the port, without intermediate storage, supported by delivery notes, thus excluding risk of mixing with wood from unclear origin. <p>Local authorities conduct checking against EUTR compliance. Law enforcement on legality is strong. Forestal Soliva has a long track record of forest operations without any violations.</p>
1.4.1	<p><i>The BP has implemented appropriate control systems and procedures to verify that payments for harvest rights and timber, including duties, relevant royalties and taxes related to timber harvesting, are complete and up to date</i></p>
Low Risk	<p>A contract/authorization between Forestal Soliva and the supplier, the forest owner, or the public authority is always in place.</p> <p>Forestal Soliva has certificates of the tax authorities on non-debt.</p> <p>Invoices/receipts are available for every purchase, they include VAT.</p> <p>Tax payments by the owners and suppliers is ensured through official procedures: if there is a debt, Forestal Soliva receives a notification from the tax authorities and pays to the authorities the owner's or supplier's debt first, then pays the owner and/or company, according to the contract.</p> <p>The main tax related to harvesting rights are paid by the private owners to the Autonomous Communities before receiving the Authorization for harvesting. The payment is verified by the authorities before issuing authorization of harvesting. There are communities that do not have to pay any fees to obtain authorization.</p>

1.5.1	<i>The BP has implemented appropriate control systems and procedures to verify that feedstock is supplied in compliance with the requirements of CITES</i>
Low Risk	<p>The tree species procured by Forestal Soliva do not include CITES listed tree species. Forestal Soliva uses only: Aleppo pine (<i>Pinus halapensis</i>), Umbrella pine (<i>Pinus pinea</i>), Maritime pine (<i>Pinus pinaster</i>) and Black pine (<i>Pinus nigra</i>).</p> <p>Spain has a high number of endangered species, mostly protected in dedicated parks or Natura 2000 network sites. Spain also has a strong legal framework and sufficient law enforcement on CITES and protected species.</p> <p>Before working in an area, the protection status of the forest is known and CITES species are taken into account. In regular forests, key-ecosystems, where protected species can occur are identified.</p>
1.6.1	<i>The BP has implemented appropriate control systems and procedures to ensure that feedstock is not sourced from areas where there are violations of traditional or civil rights.</i>
Low Risk	<p>There are no indigenous people in Spain, nor minorities that claim exceptional customary, or traditional use rights. In general, some customary rights related to forests exist, but there are no relevant issues or conflicts related to these rights. Besides, an effective legislation is in place.</p> <p>Multiple international reports do not identify Spain and the Spanish forest sector as an area where violations of traditional or civil rights occur.</p>
2.1.1	<i>The BP has implemented appropriate control systems and procedures for verifying that forests and other areas with high conservation value in the Supply Base are identified and mapped.</i>
Low Risk	<p>The Natura 2000 network are very closely related to HCV 1, 2, 3 and 4. Spain is contributing the most to the Natura 2000 network among all European countries. The implementation of it in Spain means extending the protected area status to approximately 28% of the territory, a significant proportion.</p> <p>UNESCO is a source of information on HCV 6. HCV 5 is relevant in terms of potable water and sanitary needs of the population. There are no indigenous people in Spain, nor minorities solely dependent on forests as a livelihood.</p> <p>There are high conservation values linked to cultural property and prehistoric events. The Iberian Peninsula is an area with a large amount of archaeological and prehistoric sites. There is legislation, both at the National as the Autonomous Community level that protects and catalogues sites and objects of historical and cultural value.</p> <p>Maps related to the forests and areas with high conservation value are available in open sources and on websites of the national government and Autonomous Communities.</p>

	Forest Management Plans include relevant mapping. When no Forest Management Plan is available the area is checked in front.
2.1.2	<i>The BP has implemented appropriate control systems and procedures to identify and address potential threats to forests and other areas with high conservation values from forest management activities.</i>
Low Risk	<p>During the process of approving Forest Management Plans or obtaining the Authorization for Harvesting for a particular area, the HCVs are studied by forest engineers. This is related to any harvesting being conducted on the public and private properties.</p> <p>Legislation on Natural Heritage and Biodiversity covering HCV is in force and has high degree of implementation. Forest Service evaluations of HCVs reflected in:</p> <ul style="list-style-type: none"> • Forest Management Plans; • Authorizations for Harvesting; • Contracts with public authorities (in case of work in public forest). <p>Concrete requirements are issued to the forest owner and companies in writing, and the fulfilment is checked by the Forest Service.</p> <p>Soliva and its suppliers only carries out thinnings (forest maintenance and selective harvesting operations) that are approved by the Forest Service.</p>
2.1.3	<i>The BP has implemented appropriate control systems and procedures for verifying that feedstock is not sourced from forests converted to production plantation forest or non-forest lands after January 2008.</i>
Low Risk	<p>In Spain, the forest area increased by 33,6% between 1990 and 2016.</p> <p>Forestal Soliva does not perform clearcutting operations, so it does not perform conversions itself. The maintenance operations are only performed in managed (semi)natural forest, not in plantations. Forestal Soliva harvests and processes four common, native species of pine trees.</p>
2.2.1	<i>The BP has implemented appropriate control systems and procedures to verify that feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them.</i>
Low Risk	<p>The Forest Service of each administration covers these requirements in any harvesting authorization.</p> <p>By law, forest activities with certain characteristics must have an environmental impact report. The assessment of environmental impacts of harvesting activities are well regulated in Spanish legislation. An environmental impact report for operations near water zones, for example, needs to be provided to the Forest Service when applying for the Authorization for Harvesting, otherwise it cannot be issued.</p>

	<p>Forestal Soliva and its suppliers only carries out thinnings (forest maintenance and selective harvesting operations) that are approved by the Forest Service and that are not a subject to additional environmental impact assessments. To minimize the impact, Forestal Soliva always uses best forest management practices before and during harvesting operations.</p>
2.2.2	<p><i>The BP has implemented appropriate control systems and procedures for verifying that feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b)</i></p>
Low Risk	<p>Main problem of soil quality of Mediterranean forests is soil desertification and erosion. These questions are regulated by the Forest Service.</p> <p>Spain has a Flood Risk Prevention and Management Directive, and a National Plan of Prioritized Actions to Hydrological and Forest Restoration, Soil Erosion Control and Combating Desertification.</p> <p>Forestal Soliva obtains wood from forest maintenance operations only that are approved by the Forest Service. Within the pine forest stands, the organic matter is preserved, as no clear cuts are performed.</p>
2.2.3	<p><i>The BP has implemented appropriate control systems and procedures to ensure that key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).</i></p>
Low Risk	<p>All Autonomous Communities have legislation on vulnerable ecosystems: They are referred to as National Parks, Natural Parks, Nature Reserves, Natura 2000 Network Areas, Biosphere Reserves, etc. Spain is contributing the most to the Natura 2000 network among all European countries.</p> <p>The Forest Service covers these requirements in any harvesting being conducted in either Forest Management Plans, authorizations for harvesting or harvesting contracts in public forest.</p> <p>Nature Protection Service, SEPRONA, carries out environmental law enforcement and checks the execution of the requirements.</p> <p>Code of good practices in Sustainable Forest Management is always used by Forestal Soliva. This document also covers key-ecosystems. Forestal Soliva inspects if forest operations are being executed correctly.</p>
2.2.4	<p><i>The BP has implemented appropriate control systems and procedures to ensure that biodiversity is protected (CPET S5b).</i></p>
Low Risk	<p>Law 42/2007 on Natural Heritage and Biodiversity establishes the basic legal framework for the conservation, sustainable use, improvement and restoration of natural heritage and biodiversity. Protected species are listed in Wild Species in Special Protection Regime and Spanish Catalogue of Endangered Species.</p>

	<p>Forest Management Plans and Authorisations for Harvesting include measures related to biodiversity protection.</p> <p>Forestal Soliva monitors biodiversity conservation during harvesting operations. The Code of good practices in Sustainable Forest Management is implemented.</p>
2.2.5	<p><i>The BP has implemented appropriate control systems and procedures for verifying that the process of residue removal minimises harm to ecosystems.</i></p>
Low Risk	<p>Forest Service regulates forest residue management. The Nature Protection Service conducts inspections how forest residue is treated. Authorisations for Harvesting, or Forest Management Plans include relevant restrictions of treating forest residues. The Nature Protection Service carries out law enforcement and verifies the compliance of the work performed.</p> <p>A study in publicly available information on the protection of ecosystems did not result in any concerns.</p> <p>Forestal Soliva implements guidelines on forest residue removals as mentioned in publications like “Good Environmental Practices in Sustainable Forest Management” and the “Code of good practices in Sustainable Forest Management”.</p>
2.2.6	<p><i>The BP has implemented appropriate control systems and procedures to verify that negative impacts on ground water, surface water and water downstream from forest management are minimised (CPET S5b).</i></p>
Low Risk	<p>Environmental impacts of harvesting activities, like soil or water course damage, are generally well regulated in Spanish legislation. As a major branch of forest policy, Spain continues to be aimed at ensuring the supply of water in sufficient quantity and quality”.</p> <p>The authorizations of harvesting (authorization, notification or adjudication) guarantee that the work is carried out minimizing the effects on the water, in addition, if the action affects a zone of Public Hydraulic Domain, an extra authorization to act in this area must be requested. and the competent technicians of the river basin can mark restrictions or mitigation measures.</p> <p>Forestal Soliva implements best practices on ground water and surface water issues. The forest maintenance operations Forestal Soliva performs can be considered a mitigation measure in relation to water management.</p>
2.2.7	<p><i>The BP has implemented appropriate control systems and procedures for verifying that air quality is not adversely affected by forest management activities.</i></p>
Low Risk	<p>There are reports from the European Commission and NGOs that too little is being done with regard to air pollution control. The greatest impacts on air quality in forests are caused by fires or emissions from nearby heavy industries.</p> <p>Forestal Soliva only impacts air quality by the emissions from its machinery. The work is not continuous in just one zone, so the impact is intermittent. When Forestal Soliva buys chips</p>

	from other suppliers, under contract it demands the supplier to follow the Manual of Good Environmental and Forestry Practices and implement it. This is being checked.
2.2.8	<i>The BP has implemented appropriate control systems and procedures for verifying that there is controlled and appropriate use of chemicals, and that Integrated pest management (IPM) is implemented wherever possible in forest management activities (CPET S5c).</i>
Low Risk	<p>Royal Decree 494/2012 of 9 March includes the risks of pesticide application. Currently in Spain only treatments are being carried out against the pine processionary (<i>Thaumetopoea pityocampa</i>), these treatments are only carried out by the Government in exceptional cases, when it deems appropriate.</p> <p>No reports have been found on relevant environmental damage caused by using chemicals linked to forestry operations.</p> <p>Forestal Soliva does not approve the inefficient use of pesticides. In case, this inefficient method would be used, the feedstock from these forests would not classify as SBP-compliant primary feedstock.</p>
2.2.9	<i>The BP has implemented appropriate control systems and procedures for verifying that methods of waste disposal minimise negative impacts on forest ecosystems (CPET S5d).</i>
Low Risk	<p>There are laws in force that forbid any waste disposal in the forest, such as Law 22/2011 on "The contaminated soil by waste". The Nature Protection Service (SEPRONA) are heavily involved in the protection against waste. The service carries out inspections how the waste management has been carried out.</p> <p>When the Forest Service technicians make field visits, they also check that there are no wastes in the area. Forestal Soliva technicians always make a final visit to the area of action to verify that there is no waste or damage in the area.</p>
2.3.1	<i>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.</i>
Low Risk	<p>The official statistics of national forestry inventory (IFN3) show a continuous and significant increase in standing stocks in Spain. Harvesting volumes within the Supply Base are lower than the Annual Allowable Cut. The annual increment in Spanish forests (45 million m³) is about three times greater than the amount harvested (15 million m³ per year).</p> <p>Harvest levels are always approved in front by the authorities when approving Forest Management Plans or issuing the Authorization for Harvesting.</p> <p>Forestal Soliva performs only thinnings (forest maintenance and selective harvesting operations) approved by the state authorities. Most of the forests within the supply base are</p>

	in high need of maintenance operations. The operations that are being carried out focus on forest stand improvement. In no case clear cuts are made. Selective cuttings and maintenance operations secure the continuity of the forest, improve the quality of the stand, and enable natural forest regeneration. As a result, the net increment of wood within the forest increases.
2.3.2	<i>Adequate training is provided for all personnel, including employees and contractors (CPET S6d).</i>
Low Risk	<p>According to Law 31/1995 on the Prevention of Occupational Risks, every forest worker of Forestal Soliva needs to receive training in Occupational Risk Prevention, with a 3-hour training (and certificate) and must be done annually and specifically for your job.</p> <p>In addition, Forestal Soliva implements a Manual of Good Forestry Practices and does additional instructions to all employees and subcontractors on the way to perform the forest operations. Forestal Soliva checks its suppliers (on the performed trainings/certificates and field work).</p>
2.3.3	<i>Analysis shows that feedstock harvesting and biomass production positively contribute to the local economy, including employment.</i>
Low Risk	<p>Foreign trade in the forestry sector presents a positive balance from 2012 to 2016. With regards to economic impacts and employment in the local economy of the Autonomous Communities, timber producing forests are scarce and income comes mainly from other products and services. The working population employed in fields related to the forestry sector represents 5.7% (in 2016), of the total active population employed.</p> <p>Spain importing most of its wood, and demand is growing. The Forestry Sector has a great potential in the creation of rural employment. The domestic forestry sector should increase and considering the present circumstances, more economic activity could double employment in forestry, from the current 155 000 to around 300 000 jobs. Unemployment is a major problem in Spain.</p> <p>The impact of the work carried out by Forestal Soliva covers both forestry harvesting in private forests and the mobilisation of resources from public Administrations. Maintenance operations prove the yield of the stands improve, and thus also the profitability of the land.</p> <p>Forestal Soliva incorporates local workers in its harvesting teams. The displacement of the teams has a positive impact on local economies.</p>
2.4.1	<i>The BP has implemented appropriate control systems and procedures for verifying that the health, vitality and other services provided by forest ecosystems are maintained or improved (CPET S7a).</i>
Low Risk	Pests, pathogens and climate change are the main threats to the health and vitality of the forests, along with forest fires. There is a systematic legal framework, with action plans implemented at the government level to manage the main problems detected and a data

	<p>monitoring network (European Forest Damage Monitoring Network). In addition, the level of control by the forestry authority is sound throughout the whole country. The Spanish regulations and the surveillance procedures carried out by the Autonomous Communities are coherent.</p> <p>Forestal Soliva and its suppliers implement “Good Environmental Practices in Sustainable Forest Management” and perform only maintenance operations. Frequently these are carried out manually. These kind of forest operations improve the health and vitality of forest ecosystems.</p>
2.4.2	<i>The BP has implemented appropriate control systems and procedures for verifying that natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b).</i>
Low Risk	<p>Fires currently represent one of the greatest threats to forests in Spain. Climate affects the susceptibility of forests to disturbances, as well as the frequency, intensity, duration and timing of these disturbances, including pest outbreaks. The national and regional governments are well aware of these problems and have developed policies and regulations to fight them.</p> <p>The work carried out by Forestal Soliva, which normally involves forest maintenance operations, has a positive impact on the prevention against forest fires, pests and diseases. Forestal Soliva and its suppliers carry out measures to prevent forest fires while the operations are being carried out.</p>
2.4.3	<i>The BP has implemented appropriate control systems and procedures for verifying that there is adequate protection of the forest from unauthorised activities, such as illegal logging, mining and encroachment (CPET S7c).</i>
Low Risk	<p>The assessment of harvesting activities is well regulated in Spanish legislation. On a national and regional level law enforcement is carried out well. No reports were found on substantial problems regarding illegal logging, mining and encroachment in Spain.</p>
2.5.1	<i>The BP has implemented appropriate control systems and procedures for verifying that legal, customary and traditional tenure and use rights of indigenous people and local communities related to the forest, are identified, documented and respected (CPET S9).</i>
Low Risk	<p>There are no indigenous people in Spain that required special protection in terms of their forests use rights, and there are no local communities that depend on the services of the forests in order to survive.</p> <p>Customary rights are considered before the harvesting operations are permitted. The implementation of these rights is regulated by means of the Civil Code and via regional legislation. Communally-owned community forests with their specific laws, have their own courts, subsequent to each Autonomous Community.</p>

	No publications where found on (significant) problems regarding violations of customary and traditional tenure and use rights.
2.5.2	<i>The BP has implemented appropriate control systems and procedures for verifying that production of feedstock does not endanger food, water supply or subsistence means of communities, where the use of this specific feedstock or water is essential for the fulfillment of basic needs.</i>
Low Risk	<p>Regarding the basic needs of local communities, dependence of some local communities on unregulated water for human consumption and sanitary water, it is widely accepted among the experts that the present forest management activities do not threaten water availability, and that the governmental water policy (on forest restoration and hydrological protection measures) and regulations are sufficient safeguards.</p> <p>Forest maintenance operations do not threaten water availability. This aspect is well regulated by the water law and the restrictions are reflected in the Authorization for Harvesting and in Forest Management Plans.</p>
2.6.1	<i>The BP has implemented appropriate control systems and procedures for verifying that appropriate mechanisms are in place for resolving grievances and disputes, including those relating to tenure and use rights, to forest management practices and to work conditions.</i>
Low Risk	<p>There is a well-established legal framework for land use and ownership rights, forest management activities and work conditions.</p> <p>Grievances and disputes, including those relating to tenure and use rights, to forest management practices and to work conditions, can be reported to appropriate authorities regulating the issue in question. There are different channels established to address the relevant issues, for example: official appeals, hot-lines, and visits of authorities.</p> <p>The SBP compliant procedure covers all complaints regarding forestry activities the company and its suppliers are performing.</p>
2.7.1	<i>The BP has implemented appropriate control systems and procedures for verifying that Freedom of Association and the effective recognition of the right to collective bargaining are respected.</i>
Low Risk	<p>Spain has ratified the ILO's eight Fundamental Conventions.</p> <p>One of the fundamental legal principles that underpins the current system of labour relations in Spain is the one contained in Spanish Constitution, which recognises freedom of association as being a fundamental right for all people to freely form trade unions.</p> <p>There are some concerns over civil rights in Spain, as reflected in reports by international organisations like Amnesty International, but none of these concerns are related to the forestry sector.</p>

2.7.2	<i>The BP has implemented appropriate control systems and procedures for verifying that feedstock is not supplied using any form of compulsory labour.</i>
Low Risk	<p>Spain has developed a solid legal and institutional framework to fight human rights violations and illegal employment. There is also a National Plan to fight illegal employment and Social Security fraud. International reports show, that violations of rights can affect improvements in working conditions.</p> <p>However, no relevant violations have been found of the laws on forced labour in relation to the forestry sector.</p>
2.7.3	<i>The BP has implemented appropriate control systems and procedures to verify that feedstock is not supplied using child labour.</i>
Low Risk	<p>Spain has ratified the eight Fundamental ILO Conventions.</p> <p>In relation to the forestry sector, no violations were found of the laws regarding child labour.</p>
2.7.4	<i>The BP has implemented appropriate control systems and procedures for verifying that feedstock is not supplied using labour which is discriminated against in respect of employment and occupation.</i>
Low Risk	<p>Spain has ratified the eight Fundamental ILO Conventions.</p> <p>In relation to discrimination, international research does not find significant problems in Spain.</p>
2.7.5	<i>The BP has implemented appropriate control systems and procedures for verifying that feedstock is supplied using labour where the pay and employment conditions are fair and meet, or exceed, minimum requirements.</i>
Low Risk	<p>Spain has ratified the eight Fundamental ILO Conventions.</p> <p>Collective bargaining agreements exist, in which remuneration and employment conditions are settled for forest sector workers.</p> <p>There are some concerns regarding civil rights in Spain, but none of these concerns is related to the forestry sector.</p>
2.8.1	<i>The BP has implemented appropriate control systems and procedures for verifying that appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12).</i>
Specified Risk	<p>Health and safety issues are regulated by several laws and the level of control by state authorities is high. Companies are obliged to provide health and safety training and PPE to workers on regular basis. Random government technicians make on-site inspections to verify that all workers wear PPE and all regulations are met. Forest Police officers check ongoing harvesting operations without preliminary notice.</p>

	<p>However, the forestry sector still is, after the construction sector, the sector with the highest rate of occupational accidents and occupational diseases. Despite all efforts over the years, the level of accidents does not decrease.</p> <p>Besides legally required mitigation measures, Forestal Soliva therefore implements additional mitigation measures to reduce this persistent risk.</p> <p>Forestal Soliva obliges suppliers and subcontractors to provide all necessary legal documentation (certificates of insurances, training records, records of delivery of PPE to all workers, a positive health certificate issued by a doctor) and does continuous checks for own workers and of their suppliers. An advanced check list on different health and safety issues has been developed and is being used.</p> <p>If the health and safety requirements are not fulfilled in full during harvesting operations, the SBP-compliant categorisation is rejected for the feedstock.</p>
2.9.1	<p><i>Feedstock is not sourced from areas that had high carbon stocks in January 2008 and no longer have those high carbon stocks.</i></p>
Low Risk	<p>Spain established at the national level measures aimed at securing carbon stocks and the reduction of emissions. In the framework of forestry, these measure entail:</p> <ul style="list-style-type: none"> • Promoting Sustainable Forest Management; • Restoring and expanding a forest cover. <p>Forests which occupy almost 29% of Spain's total land area are increasing by about 86 000 ha per year, both through natural expansion and through the forest plantation programme that has been under way for more than 50 years, with soil protection and erosion prevention as its main aims. This affected carbon stock in a very positive way.</p> <p>In Spain, the land-use change, and forestry sector is a net sink of CO₂, sequestering an average of 43.5tCO₂e/yr from 1990 to 2014. This represents an offset of 14% of Spain's total greenhouse gas emissions over the same period. Carbon sequestration according to last available data is higher in 2016 than in 2008.</p> <p>Forestal Soliva and its suppliers perform only forest maintenance operations. Most of the forests within the supply base are in high need of maintenance operations. The regional administrations prefer to create uneven-aged forest stands, which can be managed by selective cuttings and maintenance operations. These operations guarantee a continuous forest cover, and high carbon stocks.</p>
2.9.2	<p><i>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.</i></p>
Low Risk	<p>Forests are the greatest carbon sink compared to other land uses.</p> <p>In forests, silviculture practices affect the level of carbon stock. Analysed studies show that maintenance operations and selective thinnings positively affect the carbon stock level in</p>

	<p>the forest stand. They show the highest carbon sequestration rate. These operations guarantee a continuous forest cover, high carbon stocks, and improved growth rates.</p> <p>Forestal Soliva only conducts maintenance operations and selective thinnings.</p>
2.10.1	<i>Genetically modified trees are not used.</i>
Low Risk	<p>Activities with genetically modified organisms are regulated by Royal Decree 178/2004. Although there is no total prohibition on the use of GMO, it is strictly regulated, and licensing is required for this activity. The use of, for example, eucalypt plantations is restricted by law.</p> <p>Forestal Soliva does not operate in forests with genetically modified trees, and such wood is not utilized. Used are only four common, native pine species.</p>

11 Review of Report



11.1 Peer review

A peer review was not conducted.

11.2 Public or additional reviews

Next to the regular stakeholder consultation process, no public or additional reviews were conducted. Any comments regarding the SBR or SBE can be sent to SBP manager Laura Ivorra (e-mail: livorra@forestalsoliva.com).

12 Approval of Report

Approval of Supply Base Report by senior management			
Report Prepared by:	Laura Ivorra 	SBP manager	28/06/2019
	Name	Title	Date
The undersigned persons confirm that I/we are members of the organisation's senior management and do hereby affirm that the contents of this evaluation report were duly acknowledged by senior management as being accurate prior to approval and finalisation of the report.			
Report approved by:	Miguel Soliva 	Director	28/06/2019
	Name	Title	Date

13 Updates

(Note: Updates should be provided in the form of additional pages, either published separately or added to the original public summary report.)

13.1 Significant changes in the Supply Base

N/A - Initial audit

13.2 Effectiveness of previous mitigation measures

N/A - Initial audit

13.3 New risk ratings and mitigation measures

N/A - Initial audit

13.4 Actual figures for feedstock over the previous 12 months

20845 tonnes of primary feedstock (wood chips)

13.5 Projected figures for feedstock over the next 12 months

30000 tonnes of primary feedstock (wood chips).

Annex 1: Detailed Findings for Supply Base Evaluation Indicators

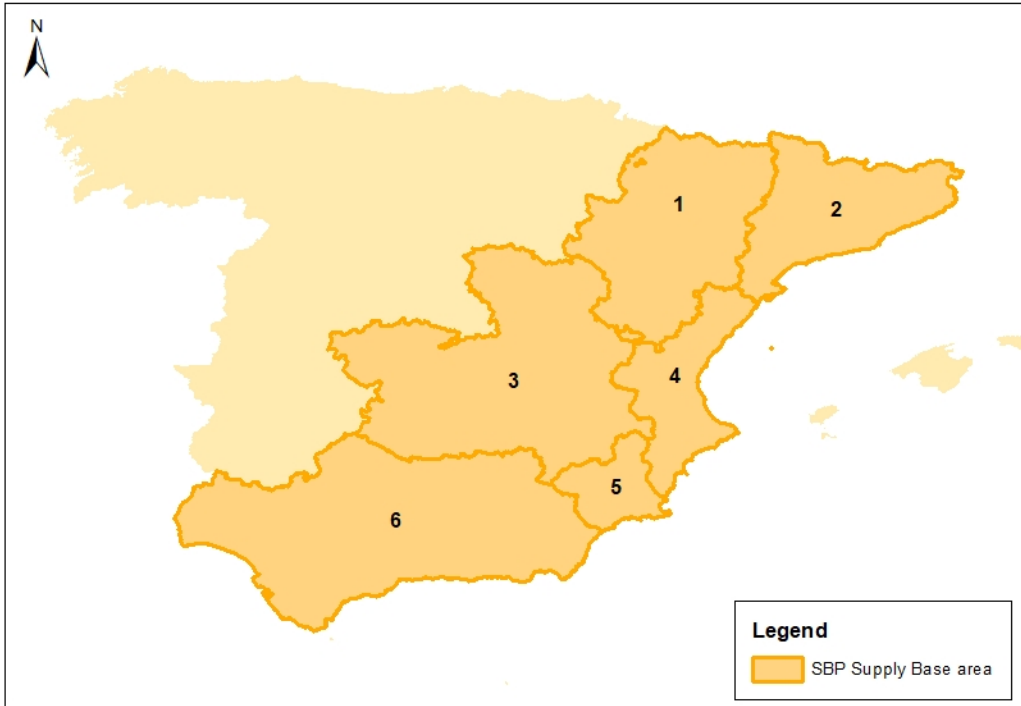
	Indicator
1.1.1	The Biomass Producer's Supply Base is defined and mapped.
Finding	<p>Soliva is a biomass producer located in Catalunya. The Supply Base, as defined by Soliva, covers the following Spanish Autonomous Communities:</p> <ol style="list-style-type: none"> 1. Aragon 2. Catalunya 3. Castilla-La Mancha 4. Valencian Community 5. Murcia 6. Andalusia <p>The supply Base (per Autonomous Community of Spain):</p>  <p>The scope of the Supply Base is limited to the official area of forest fund of these regions (9.5 million ha). Soliva mainly harvests coniferous tree species. The main species is Aleppo pine (<i>Pinus halepensis</i>).</p>

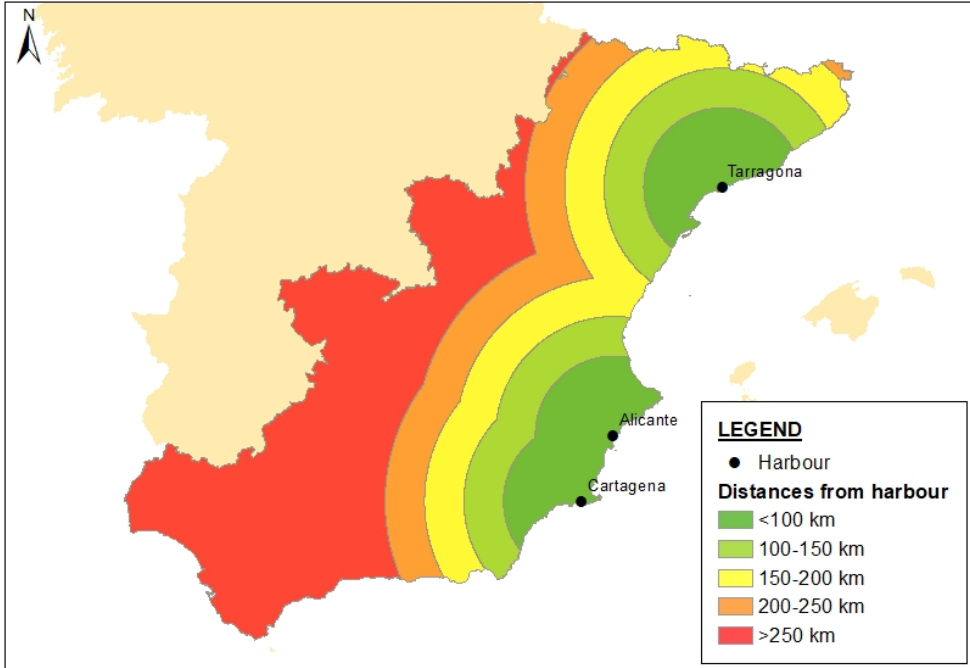
Table 1.1.1: Forest cover characteristics per region of the Supply Base (2016)

Autonomous Community	Forest area (ha)	Canopy-covered (ha)	Coniferous (ha)	Pinus halepensis (ha)
Aragon	2.615.332	1.543.465	953.440	186.508
Catalunya	2.060.174	1.626.212	716.058	300.645
Castilla-La Mancha	3.564.779	2.739.597	1.103.669	<i>No data</i>
Valencian Community	1.116.464	404.063	360.193	282.478
Murcia	486.019	289.550	260.595	232.401
Andalusia	4.345.500	2.641.000	824.700	564.910
TOTAL (ha)	14.188.268	9.243.887	4.218.655	-

The Biomass is harvested by Soliva itself, or by its suppliers. The wood is chipped in the forest and is delivered to the ports directly from the harvesting site.

Ports of delivery are Alicante, Cartagena, Castellon and Tarragona. The maximal haulage distance is 200 km, in some exceptional cases, it could reach up to 250 km, but the most common haulage distance is around 100 km. It is (economically) unfeasible to supply biomass from other regions.

The Supply Base and the approximate haulage distance to the used ports (the area in orange is considered only in exceptional cases; the area in red is not feasible in practice):

	 <p>LEGEND</p> <ul style="list-style-type: none"> ● Harbour Distances from harbour <100 km 100-150 km 150-200 km 200-250 km >250 km
Means of Verification	<p>The Autonomous Communities of Spain are clearly mapped.</p> <p>Forest area is registered at the level of municipalities</p>



	<p>Delivery documentation and the delivery register of the company prove the origin of wood</p> <p>Google maps (distances).</p>
Evidence Reviewed	<p>National Forest Inventory</p> <p>Ministry for Ecological transition (website)</p> <p>Ministry of Agriculture, Fishery and Food (website)</p> <p>Forestry yearbooks per Autonomous Community</p> <p>Statistics on forest area:</p> <p>Aragon:</p> <p>http://www.aragon.es/DepartamentosOrganismosPublicos/Institutos/InstitutoAragonesEstadistica/AreasTematicas/14 Medio Ambiente Y Energia/01 SectoresProductivos/ci.03 Selvicultura.detalleDepartamento</p> <p>Andalusia:</p> <p>Statistics on Forestry in Andalusia:</p> <p>http://www.juntadeandalucia.es/medioambiente/site/ima/</p> <p>Institute Nacional de Estadística: http://www.ine.es</p> <p>Official document of INFOCA (Plan de prevención de incendios de Andalucía):</p> <p>https://www.juntadeandalucia.es/medioambiente/web/Bloques Tematicos/Patrimonio Natural. Uso Y Gestion/Montes/Incendios Forestales/plan_infoca/Cap02 medio natural andaluz.pdf?lr=lan_g_es</p> <p>Global Forest Watch: https://www.globalforestwatch.org</p> <p>Estructura forestal: caracterización de los bosques y otras superficies forestales (Ministry of Agriculture and Fisheries, Food and Environment, 2016):</p> <p>https://www.mapa.gob.es/es/desarrollo-rural/estadisticas/forestal estructura 2016.aspx</p>
Risk Rating	<p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>
Comment or Mitigation Measure	<p>Key personnel were trained to implement the SBP feedstock requirements regarding the Supply Base.</p>

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

Finding

The Forestry Administration is located within the Ministry of Agriculture, Fisheries, Food (MAPA, formerly MAPAMA) at the national/State level, which is responsible for basic legislation and planning of national affairs. Autonomous Communities in Spain have their respective forestry authorities, which take care of forest resources on the ground at the legal level and planning at the operational level.

The Forestry Law (Law 43/2003, of 21 November, on Forests, Law 10/2006, of 28 April, and Law 21/2015, of 20 July, which amends Law 43/2003), Chapter IV states that:

- When a Management or Equivalent Plan exists, or the forest is included within the scope of a PORF (Forest Resources Management Plan), the holder must notify the competent body of the Autonomous Community before the harvest;
- In other cases, administrative authorisation is required before harvesting.

In both public and private forests, forestry operations are subject to supervision by personnel from the Public Authority.

In public forests, approval of harvesting operations must be given by the Forestry Service of the Autonomous Community. Authorization for Harvesting is issued by the authorities and provided to the company that is selected to perform the harvesting operations.

In private forests, before the harvesting operations commence, the owners have to send an authorization request to the Forest Service about the planned forestry operations. Based on the authorization request, the government approves or rejects the planned work. In case of approval, they issue Authorization for Harvesting to the owner, which defines exactly which kind of forest work can be done and at this territory (specifying the geographical coordinates and the characteristics of the harvesting).

Soliva and its suppliers obtains feedstock both from public and private areas. In all cases, a contract with the seller is closed. According to the contract, the Authorization for Harvesting needs to be provided to Soliva before the deliveries, or the approved Forest Management Plan with the notification. Relevant documentation is specified in the table below for every region is the supply base. Otherwise, the wood cannot be supplied.

In case of work with suppliers, who are the middlemen between the Soliva and the owner, the Authorization for Harvesting obtained by the owner has to be provided. In some cases, suppliers consider this to be commercially sensitive information and they are not ready to provide the Authorization for Harvesting, but only the number of the document. In these cases, Soliva does not accept the wood. The approved Forest Management Plan, if available, including a notification, also needs to be presented by the supplier. Otherwise the contract is not signed by Soliva.

Table 1.1.2: Demands on issuing a harvesting permit and degree of control

Autonomous Community	Request of harvesting permits		Degree of control by the forest authority
	With approved FM plan	Without approved FM plan	
Aragon	Notification ¹⁾	Authorization	Very high
Cataluña	Notification	Authorization	Very high
Castilla-La Mancha	Notification	Authorization	Very high
Valencian Community	Notification	Authorization	High
Murcia	Authorization	Authorization	Very high
Andalusia	Notification	Authorization	High

1) The national forest service checks the situation and can deny or alter the harvesting plan

COSE (the Spanish Confederation of Forestry Organisations) concludes that the degree of control by the forestry authority is high, or very high in all the Autonomous Communities except in Galicia, where the level of control is considered to be medium high (MAPAMA, 2013).

Cadastral information exists throughout the whole country (Ministry of Finance and Public Administration). All properties are given a unique cadastral reference number that allows them to be identified and located. The cadastral reference number is linked to a cadastral map.

The risk is considered low, due to:

- Availability of clear cadastral data in Spain;
- A high level of supervision on harvesting operations by the regional governments;
- Soliva demands the supplier submits the official Authorisation of Harvesting;
- Delivery documents available for every delivery.

Means of Verification

Contract with supplier.
Delivery note and register (to the port).
One of the following documents:

- Authorization for Harvesting (of the Autonomous Communities)
- Forest Management Plan (if available);
- Contract with public authority on forest operations.

Evidence Reviewed

The Spanish Forest Law: Ley 43/2003, 21 November, de Montes:
<https://www.boe.es/buscar/act.php?id=BOE-A-2003-21339>

	<p>COSE report (MAPAMA, 2013): https://www.mapa.gob.es/es/desarrollo-rural/temas/politica-forestal/control_cortas_de_madera_espanya_2012_tcm30-152390.pdf</p> <p>Real Estate Cadastre: http://www.catastro.meh.es/ http://www.sedecatastro.gob.es/</p> <p>FSC National Risk Assessment for Spain, 11 September 2018</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	<p>An additional check is made by Soliva is that they are hiring the trucks for wood chips deliveries from forest to the port location.</p> <p>Soliva does not sign the contract and does not approve deliveries, if there should be an Authorization for Harvesting, but it is not presented.</p> <p>Soliva maintains an excel file on biomass entries which covers the name of the supplier and the district of origin.</p>

	Indicator
1.1.3	The feedstock input profile is described and categorised by the mix of inputs.
Finding	<p>All the harvested wood is chipped in the forest and is delivered to the port facilities by trucks. Chipping and loading of the wood chips are supervised by a forest engineer of Soliva. He also checks if the trucks have arrived in the port.</p> <p>Mainly Aleppo pine is harvested by Soliva and its suppliers. The biomass could sometimes also consist of black pine, umbrella pine and maritime pine, Scots pine, radiata pine and mountain pine. Soliva records them as Pine.</p> <p>The port administrations provide the following information regarding the incoming biomass:</p> <ul style="list-style-type: none"> • Date • Control document number • Lot name • Number plate of the truck • Material category (always wood chips); • Weight. <p>Additionally, Soliva registers the following information:</p> <ul style="list-style-type: none"> • District of origin;

	<ul style="list-style-type: none"> • Tree species; • Supplier name; • Volume in m³; • Name of the transport company.
Means of Verification	<p>There is only one input profile: “pine wood chips”.</p> <p>All tree species mentioned on:</p> <ul style="list-style-type: none"> • Authorization for Harvesting (of the Autonomous Communities) • Forest Management Plan (if available); • Contract with public authority for forest work; • Transportation documents; • Internal register. <p>The ports report every day and monthly.</p> <p>Internal register (Excel file) of Soliva.</p>
Evidence Reviewed	<p>European Atlas of Forest Tree Species https://forest.jrc.ec.europa.eu/en/european-atlas/</p> <p>The ports report every day and monthly.</p> <p>Internal register (Excel file) of Soliva.</p> <p>Authorisation of Harvesting.</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	<p>Every month the ports also provide a signed report with the actual amount of wood chips stored at the port.</p>

	Indicator
1.2.1	The Biomass Producer has implemented appropriate control systems and procedures to ensure that legality of ownership and land use can be demonstrated for the Supply Base.
Finding	<p>Every property in Spain must be registered in the Real Estate Cadastre and can be registered voluntary in the Property Register. However registration in the Cadastre is considered enough, since ownership is not a conflict topic.</p> <p>The FSC National Risk Assessment for Spain (2018) states: “Real Estate Cadastre - registration is compulsory and free. The cadastral description includes the physical, legal and economic characteristics of the property: its location, cadastral reference, surface area, use, cultivation, plan, appraisable value and owner.” The</p>

	<p>Real Estate Cadastre is full of inaccuracies (borders, owners, geometry of the parcels, etc...). However, in general, there are no conflicts on landownership.</p> <p>“Land tenure and use rights are covered by Spanish law and authorities have implemented tools to record and monitor land tenure and use rights. Since ancient times, these rights have had great social and economic relevance, so they are widely developed and recognized. Examples of land tenure and use rights relevant to the Spanish context include, but are not limited to: mapping and marking of public forests, property registration and cadastre, boundaries (such as property markers) on small private properties, etc. There are many civil associations that play an important role in the restoration and maintenance of the different types of property, such as partnership forests (community forests).”</p> <p>Minor examples of conflicts are witnessed only, for example due to:</p> <ul style="list-style-type: none"> • The documentary for the property can be out of date (old tenure documents, old contracts, or contracts without a notary); • Abandoned properties, people can leave without notice; • Easements conflict; • Conflicts with consortia. <p>Such conflicts are usually well-known to the public authorities and there are established legal ways for resolving the conflicts through negotiation, or via the courts. Laws and regulations in this sphere are respected and work as an efficient tool to prevent the (FSC CW NRA, 2018). This aspect of law enforcement is orderly carried out and no information on corrupted procedures, or law-suits have been found, regarding the legality of ownership and land use within the forest fund of Spain.</p> <p>According to information available from NGOs and governmental sources, this risk can be considered low.</p>
Means of Verification	<p>Contract with the private owner or an agreement with a public authority.</p> <p>One of the following documents:</p> <ul style="list-style-type: none"> • Real Estate Cadastre • Tenure documents (Property Register, wills purchase documents...)
Evidence Reviewed	<p>Real Estate Cadastre: http://www.catastro.meh.es/ http://www.sedecatastro.gob.es/</p> <p>Property Register: https://registropropiedad.derecho.com</p> <p>FSC National Risk Assessment for Spain, 11 September 2018 (FSC CW NRA, 2018)</p>
Risk Rating	<p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>
Comment or	<p>Soliva has an additional standard operating procure to avoid conflicts regarding the legality of ownership and land use. As mentioned in indicator 1.1.2, Soliva</p>

Mitigation Measure	always demands the Authorization for Harvesting, or approved Forest Management plan for private properties. The Forest Service establishes the ownership right through the cadastre before issuing this document or approving the FM plan. Only if this document is provided, Soliva signs the contract with the owner.
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	Indicator
1.3.1	The BP has implemented appropriate control systems and procedures to ensure that feedstock is legally harvested and supplied and is in compliance with EUTR legality requirements.
Finding	<p>The Spanish National Plan for the Control of the Legality of Commercialized Timber (February 2015) is being implemented by the Ministry of Agriculture, Fisheries, and Food. Autonomous Communities, are the competent authorities to which corresponds the normative development and the executive functions inherent to their role, in the accomplishment of controls on the agents and traders who commercialize with timber and timber products, as well as the reception and processing of the statement of responsibility included in this Royal Decree, and the control of monitoring bodies with headquarters in the Autonomous Community. The National Control Plan - or Regional Control Plans, where appropriate - is the basis for the different actions.</p> <p>Spain reported that they regularly receive complaints from small businesses that there should be a threshold of operator size below which the EUTR should not apply. Spain suggested that the harmonisation of procedures on checks of operators and risk assessments was required and that technical support should be developed (UNEP-WCMC, 2018).</p> <p>Soliva undertakes 'due diligence' to be sure that illegally harvested wood does not enter the supply chain, ensuring the EUTR compliance. There is always one tire supply chain.</p> <p>Soliva does the harvesting itself or buys wood from suppliers – in both cases Soliva hires the trucks for delivery from the harvesting site and supervises the wood chipping and loading of the trucks.</p>

	<p>Quantity of wood is estimated on the contractual stage and registered exactly in the port. If more wood was harvested from the forest then it was estimated, the difference is declared to the forest authority.</p> <p>Legal details of the suppliers are fixed in the contract between Forestal Soliva SL and the owner. In case the contract is concluded between Soliva and supplier, the details about owner are also collected.</p> <p>Soliva always demands the Authorisation for harvesting or a notification and the FM plan.</p> <p>Soliva harvests only pine species (aleppo pine, umbrella pine, black pine, scots pine, radiata pine, mountain pine and maritime pine. These tree species are neither red-listed in Spain, nor by CITES.</p> <p>Soliva completes Declaracion responsable according to the real decree 1088/2015.</p> <p>On basis of the information listed above and at the previous indicators the risk of illegal wood entering in the supply chain is low.</p>
Means of Verification	<p>Soliva always</p> <ul style="list-style-type: none"> • Demands the Authorization for Harvesting (must be available), mentioning the land owner • Has a contract with the supplier • A Forestal Soliva technician coordinates chipping and transport operations to the port <p>Due Diligence system of Soliva;</p> <p>Declaracion responsable.</p>
Evidence Reviewed	<p>COSE report (MAPAMA, 2013): https://www.mapa.gob.es/es/desarrollo-rural/temas/politica-forestal/control_cortas_de_madera_espanya_2012_tcm30-152390.pdf</p> <p>EUTR web site: http://ec.europa.eu/environment/forests/timber_regulation.htm</p> <p>Law 43/2003, of 21 November, on Forestry</p> <p>Royal Decree 1088/2015</p> <p>https://www.boe.es/buscar/act.php?id=BOE-A-2003-21339</p> <p>UNEP-WCMC, 2018. Background analysis of the 2015-2017 national biennial reports on the implementation of the European Union's Timber Regulation (Regulation EU No 995/2010). UNEPWCMC, Cambridge.</p>
Risk Rating	<p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>
Comment or Mitigation Measure	<p>In case the above-mentioned information and documentation is not available (for instance, not all the suppliers want to share information regarding the owner of the forest property, and they don't provide the Authorization for Harvesting), Soliva does not sign the procurement contract and the wood it not bought.</p>

	Indicator
1.4.1	The Biomass Producer has implemented appropriate control systems and procedures to verify that payments for harvest rights and timber, including duties, relevant royalties and taxes related to timber harvesting, are complete and up to date.
Finding	<p>A wide range of taxes are levied on different sources, the most important ones being income tax, social security contributions, corporate tax, value added tax; some of them are applied at national level and others at national and regional levels. Most national and regional taxes are collected by the Agencia Estatal de Administración Tributaria, which is the organization responsible for collecting taxes at the national level. Other minor taxes, such as property transfer tax (regional), real estate property tax (local), road tax (local) are collected by regional, or local administrations.</p> <p>A study published by Ministry of Fisheries, Food in collaboration with Spanish Confederation of Forest Organizations states that the degree of control by the forest authority is high or very high in the regions of the Supply Base (MAPAMA, 2013).</p> <p>The functioning of the tax system in Spain prevents this risk from occurring on a significant scale, as there is an obvious way of tracking the operation and consequent payment of taxes.</p> <p>The main tax related to harvesting rights are paid by the private owners to the Autonomous Community before receiving the Authorization for Harvesting. The Authorization for Harvesting cannot be issued without payment of this tax.</p> <p>Value Added Tax legislation specifies rights, obligations and liability of the tax authorities and taxable entities.</p> <p>VAT is included in the invoice issued by the supplier. It is 12% for the individuals and 21% for the companies. Payment of this tax is crosschecked by the tax authority on the basis of the declaration of both parties (the seller and the buyer). If it's not paid, the tax authority conducts a tax audit and issued fines if there are violations of the tax payment obligations.</p> <p>In case of harvesting in the public areas the VAT tax is also included in the invoice.</p> <p>Other taxes:</p> <ul style="list-style-type: none"> • The tax certificate from the Tax Agency ensures payment of VAT, income tax, corporate tax and tax on income of physical persons (employees); • The tax certificate issued by the Ministry of Labour, Migration and Social Security ensures payment of all social security taxes, including payment in pension funds. <p>In case a company wants to work on public land, it needs to be accredited and registered in the Register for Accreditation of Companies (REA). To obtain this certificate, companies have to pay all necessary taxes and duties.</p>

	<p>Spain has Corruption perception index of 58 (in 2018). This indicates that state issued documents are trustworthy and can be considered reliable. Tax laws were strengthened over the past years, which provides more reliability. There were no significant fraud cases related to corruption related to the forest sector for many years.</p> <p>No reports were found on significant fraud linked to corruption in the forest sector, nor on significant illegal logging.</p> <p>As Soliva works on public lands, it is checked on payment of all taxes and duties. The government also checks if Soliva is accredited and registered to work on public lands. Sometimes self-billing is applied.</p> <p>Considering the above information and Soliva's procedures, this risk can be considered low.</p>
Means of Verification	<p>Contracts between Forestal Soliva and suppliers, forest owners, subcontractors.</p> <p>Certificates of non-debt to the tax authorities.</p> <p>Invoices/receipts.</p> <p>Accreditation and registration in the Register for Accreditation of Companies</p> <p>The tax certificate from the Tax Agency</p> <p>The tax certificate issued by the Ministry of Labour, Migration and Social Security</p> <p>Authorization for Harvesting.</p>
Evidence Reviewed	<p>Ministry of Labour, Migrations and Social Security: http://www.mitramiss.gob.es</p> <p>Corruption perception index: https://www.transparency.org/country/ESP#</p> <p>Tax Authority: www.agenciatributaria.es (tax regulations, including VAT Basic Regulations, IRPF (Income Tax) Basic Regulations, Corporation Tax Basic Regulations)</p> <p>Tax definitions: https://debitoor.es/glosario/definicion-irpf</p> <p>COSE report (MAPAMA, 2013): https://www.mapa.gob.es/es/desarrollo-rural/temas/politica-forestal/control_cortas_de_madera_espaa_2012_tcm30-152390.pdf</p>
Risk Rating	<p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>
Comment or Mitigation Measure	<p>Soliva sometimes works with subcontractors to harvest and transport the biomass. First time a contract is signed with these kind of companies, the subcontractors' tax certificates are collected by Soliva.</p>


	Indicator																																																				
1.5.1	The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is supplied in compliance with the requirements of CITES.																																																				
Finding	<p>Spain joined the CITES Convention on 16 May 1986. In Spain, no CITES tree species are listed (CITES Annex I, II and III).</p> <p>Spain is one of the few countries in the world that has an endemic feline (the Iberian lynx), as well as a large bird of prey (the Imperial eagle) and a host of other endemic species.</p> <p>Of the 915 species of wild terrestrial vertebrates included in the EIDOS database, 104 (11.34 %) are endangered, according to the IUCN.</p> <p>Wild terrestrial species diversity</p> <table><tr><th>Taxonomic group</th><th>Total species</th><th>Endangered¹</th><th>Alien²</th></tr><tr><td>Terrestrial vertebrates</td><td>915</td><td>104</td><td>69</td></tr><tr><td>Land mammals</td><td>114</td><td>19</td><td>11</td></tr><tr><td>Birds</td><td>581</td><td>58</td><td>16</td></tr><tr><td>Amphibians</td><td>36</td><td>5</td><td>0</td></tr><tr><td>Reptiles</td><td>92</td><td>15</td><td>11</td></tr><tr><td>Freshwater fish</td><td>92</td><td>7</td><td>31</td></tr><tr><td>Terrestrial invertebrates</td><td>57 000</td><td>>258 (>0.5 %)</td><td>-</td></tr><tr><td>Vascular plants</td><td>7 066</td><td>826</td><td>141</td></tr><tr><td>Non-vascular terrestrial plants</td><td>>2 000</td><td>>170 (>9 %)</td><td>-</td></tr><tr><td>Bryophytes</td><td>1 100</td><td>170 (15 %)</td><td>-</td></tr><tr><td>Fungi</td><td>23 000</td><td>-</td><td>-</td></tr><tr><td>Total terrestrial species</td><td>>91 000</td><td>-</td><td>210</td></tr></table> <p>Source: MITECO</p> <p>1) Endangered species: Refers to species whose survival is unlikely if the causal factors of their current situation remain in effect, or to species whose populations are at risk of being in a situation in which their survival is unlikely in the immediate future if the adverse factors affecting them are not corrected.</p> <p>2) Alien or non-indigenous species: Refers to species and subspecies, including their parts, gametes, seeds, eggs or propagules that could survive or reproduce, which have been introduced outside their area of natural distribution or area of potential dispersal and which would not have occupied the current area if not introduced directly or indirectly or if not managed by humans.</p> <p>The Law 42/2007, of December 13, on Natural Heritage and Biodiversity establishes the basic legal regime for the conservation, sustainable use, improvement and restoration of the Spanish natural heritage and biodiversity and includes the basic framework for the management of the Natura 2000 network.</p>	Taxonomic group	Total species	Endangered ¹	Alien ²	Terrestrial vertebrates	915	104	69	Land mammals	114	19	11	Birds	581	58	16	Amphibians	36	5	0	Reptiles	92	15	11	Freshwater fish	92	7	31	Terrestrial invertebrates	57 000	>258 (>0.5 %)	-	Vascular plants	7 066	826	141	Non-vascular terrestrial plants	>2 000	>170 (>9 %)	-	Bryophytes	1 100	170 (15 %)	-	Fungi	23 000	-	-	Total terrestrial species	>91 000	-	210
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Fungi	23 000	-	-																																																		
Total terrestrial species	>91 000	-	210																																																		

	<p>By protecting eco-systems, the CITES species living in these environments are protected as well. Before working in an area, the protection status of the forest is known and CITES species are taken into account.</p> <p>SEPRONA is the special section of the Spanish Guardia Civil dedicated to the protection of the environment and, in particular, compliance with CITES. Some Autonomous Communities such as the Basque Country or Catalonia have also powers regarding environmental crime. The Ertaintxa (Basque Country) and the Mossos d'Esquadra (Catalonia) have special sections working on environmental crimes including wildlife crime. However, none of these above-mentioned police forces has exclusive jurisdiction in these matters, so at times national and local police or forest guards can initiate proceedings.</p> <p>Different territorial authorities (Inspection Services, SOIVRE) and Border Inspection Points (Puntos de Inspección Fronteriza, PIF) work daily with suppliers and customers. No evidence on CITES violations in Spain were found.</p> <p>The reform of the Criminal Code by Act 1/2015: instead of referring to endangered species, Article 332 now refers to protected species, widening the scope of the protection. These provisions cover illegal catching and poaching in Spain. As interviewed experts pointed out, illegal catching and poaching of local endemic species affect different populations in different areas. SEPRONA (Special Police Force for the Protection of Nature) has stated that German inspectors come to Spain to hunt and poach amphibians.</p> <p>Regarding CITES and EU Regulations, Spain has stricter domestic measures regarding the trade, taking, possession and transport of endangered species. In addition, there are stricter regulations at the regional level enacted by the Autonomous Communities for the taking and possession of some native species. Possession of exotic species is restricted, including those listed in the Annexes to Regulation (EC) No 338/97. The Law of 21 September 2015 reforming the Act on Biodiversity and Natural Heritage established administrative offences concerning wildlife crime in Article 80. (report for the European Parliament Committee on the Environment, Public Health and Food Safety, 2016).</p>
Means of Verification	<p>List of tree species procured by Soliva and its suppliers.</p> <p>Legal forestry practices:</p> <ul style="list-style-type: none"> • Authorization for Harvesting; • Forest Management Plan (if available) and notification of harvesting; • Contract with public authority for forest work.
Evidence Reviewed	<p>Portal of the CITES management authority in Spain: http://www.cites.es</p> <p>Report for the European Parliament Committee on the Environment, Public Health and Food Safety, 2016:</p>

	<p>http://www.europarl.europa.eu/RegData/etudes/IDAN/2016/578962/IPOL_IDA(2016)578962_EN.pdf</p> <p>Royal Decree 630/2013 regulating the Spanish list of exotic invasive species (Real Decreto 630/2013, de 2 de agosto, por el que se regula el Catálogo español de especies exóticas invasoras. (BOE 03/08/2013))</p> <p>Information about species in Spain: http://www.miteco.gob.es/es/biodiversidad/temas/inventarios-nacionales/inventario-especies-terrestres</p> <p>Statistics on wild species: http://www.miteco.gob.es/es/biodiversidad/servicios/banco-datos-naturaleza/Eidos_acceso.aspx</p> <p>Information on invasive alien species: https://www.miteco.gob.es/es/biodiversidad/temas/conservacion-de-especies/especies-exoticas-invasoras/default.aspx</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
1.6.1	The Biomass Producer has implemented appropriate control systems and procedures to ensure that feedstock is not sourced from areas where there are violations of traditional or civil rights.
Finding	<p>There are no indigenous people in Spain, nor minorities that claim exceptional customary, or traditional use rights. In general, some customary rights related to forests exist, but there are no relevant issues or conflicts related to these rights. Besides, an effective legislation is in place to resolve any kind of conflicts related to the forest use rights. There are many forestry associations or similar groups at local or regional level that carry out important work in the recovery or maintenance of customary uses of forests.</p> <p>The Spanish forest sector is not associated with violent armed conflicts, including those that threaten national or regional security and/or are linked to military dictatorship. Labour rights are upheld well, including rights as specified in ILO Fundamental Principles and Rights at Work. Spain is not subject to international sanctions or bans on timber exports and no sanctioned persons related to the Spanish forestry sector were identified.</p> <p>The conclusions from the following international reports can support that the risk of violation of traditional and civil rights can be considered low:</p> <ul style="list-style-type: none"> • World Bank: Global governance indicators – working groups report on aggregate and individual governance. In 2014, Spain had scores between 70.19 and 84.62 in the percentile range among all countries of five out of six dimensions of governance. Compared to the over 200 countries in this ranking, Spain has a relatively high score. • World Bank Harmonized List of Fragile Situations: Spain is not on this list. • Human Rights Watch: although there are some concerns regarding civil rights in Spain, there are no concerns related to forests or forestry sector. • WWF Global. Illegal logging. Spain is not reported as a source of illegal timber. Spain is mentioned by some sources as a consumer of illegally harvested wood, but Spain does not appear in reports as a primary source of illegal timber. • Chattam House. Illicit Indicators of Records - Country Report - Illegal logging is not a significant problem in Spain. • The Corruption Perceptions Index score is 58 (2018). Governmental organisations and their documents are trusted.
Means of Verification	<p>Inquiries of local landowners, identification in traditional rights.</p> <p>Local forestry associations reports.</p> <p>Information at municipalities and churches.</p>

	Forest Management Plans.
Evidence Reviewed	<p>Mass media reports and international reports of the organisations concerned.</p> <p>World bank governance situation: http://info.worldbank.org</p> <p>World Bank Harmonized List of Fragile Situations: http://siteresources.worldbank.org/EXTLICUS/Resources/511777-1269623894864/Fragile Situations List FY11 (Oct 19 2010).pdf</p> <p>Human right watch: http://www.hrw.org</p> <p>WWF Global: http://wwf.panda.org/our work/forests/deforestation causes/illegal logging/</p> <p>Global Witness: www.globalwitness.org</p> <p>Chattam House: https://www.illegal-logging.info/regions/spain</p> <p>Corruption Perceptions Index: https://www.transparency.org/cpi2018</p> <p>FSC National Risk Assessment for Spain, 11 September 2018</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.1.1	<p>The Biomass Producer has implemented appropriate control systems and procedures for verifying that forests and other areas with high conservation values are identified and mapped.</p>
Finding	<p>There are legal instruments to identify, map and protect the network of areas of high conservation importance by the Ministry of Agriculture, Fishing and Food. The Law 42/2007, of December 13, on Natural Heritage and Biodiversity establishes the basic legal regime for the conservation, sustainable use, improvement and restoration of the Spanish natural heritage and biodiversity and includes the basic framework for the management of the Natura 2000 network. This is complemented by relevant regulations in each Autonomous Community. It also includes the international standards and recommendations that international environmental organizations, such as the Council of Europe or the Convention on Biological Diversity, have published.</p> <p>One of the resources supporting implementation of the Law 42/2007 are the maps available online.</p>  <p>Áreas protegidas de España Observatorio EUROPARC-España</p> <p>Fuente cartográfica: Banco de Datos de la Naturaleza, Ministerio de Agricultura y Pesca, Alimentación y Medio Ambiente (MAPAMA, diciembre 2016) Elaboración: Oficina Técnica de EUROPARC-España, 2017</p> <ul style="list-style-type: none"> Parques Nacionales Parques Naturales Red Natura 2000 Reservas de la Biosfera

Spain is contributing the most to the Natura 2000 network among all European countries. The implementation of it in Spain means extending the protected area status to approximately 28% of the territory, a significant proportion.

In Spain there are 1,863 Natura 2000 sites, of which 1,467 are Sites of Community Importance (LIC, Lugares de Importancia Comunitaria) and 644 are Special Protection Areas for Birds (ZEPA, Zonas Especiales de Protección para las Aves), covering 27.3% of Spanish territory; some LIC and ZEPA overlap.

The Natura 2000 Viewer shows on a map the location of Natura 2000 sites along with other information across different layers. The Habitats Directive and the Natura 2000 Network have a monitoring and reporting system (47) that provides information on the updated status of their implementation in the territory.

Regarding forest planning, 14.5% of the forest area has a planning tool (Forest Management Plan or similar), of which one third are private forests and two thirds public forests. However, in recent years the forestry administrations of the Autonomous Communities are facilitating the planning of small holdings through simplified planning tools or "umbrella" plans to which forest owners can adhere and thus cover many small and medium forest properties for which developing individual plans is not affordable.

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.

HCV 2 Landscape-level ecosystems and mosaics - 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.

HCV 3 Ecosystems and habitats - Rare, threatened, or endangered ecosystems, habitats or refugia.

HCV 4 Ecosystem services - Basic ecosystem services in critical situations, including protection of water catchments and control of erosion of vulnerable soils and slopes.

HCV 5 Community needs - Sites and resources fundamental for satisfying the basic necessities of local communities or indigenous peoples (for livelihoods, health, nutrition, water, etc...), identified through engagement with these communities or indigenous peoples.

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.

The most valid and updated reference for this assessment is the Common Guidelines for the Identification of High Conservation Values, published in 2013 by

	<p>the HCV Resource Network, which was subsequently published in Spanish in 2014. The Birds and Habitats Directives and other relevant documents on nature protection and management in Spain have been adopted as global references for biological HCV.</p> <p>The website of the Ministry of Agriculture Fisheries, Food contains information on HCV, their management and conservation, as well as on national forest issues. Water management is the responsibility of the Ministry also. The available data are sufficient to determine the presence of HCV in the Supply Base.</p>
Means of Verification	<p>Legislation in force.</p> <p>Online maps.</p> <p>Forest Management Plans.</p> <p>UNESCO is a source of information on cultural HCV.</p>
Evidence Reviewed	<p>Law 42/2007, of December 13, on Natural Heritage and Biodiversity https://www.boe.es/buscar/act.php?id=BOE-A-2007-21490</p> <p>Maps catalogue: https://www.mapama.gob.es/ide/metadatos/</p> <p>Natura 2000 Network http://www.magrama.gob.es/es/biodiversidad/temas/espacios-protegidos/red-natura-2000/default.aspx</p> <p>Map of Sites of Community Importance (LIC) https://www.mapama.gob.es/ide/metadatos/srv/spa/metadata.show?uuid=0cb17ff1-5b72-4588-9cad-a031a62bbcfa</p> <p>Forest Map of Spain Ministerio para la Transición Ecológica (Ministry for Ecological Transition). https://www.miteco.gob.es/es/biodiversidad/servicios/banco-datos-naturaleza/informacion-disponible/zona3_mfe200.aspx</p> <p>Map of Areas of Special Protection for Birds (ZEPA). Ministerio de Agricultura, Alimentación y Medio Ambiente, MAGRAMA (Ministry of Agriculture, Fisheries, Food and Environment). http://www.magrama.gob.es/es/biodiversidad/servicios/banco-datos-naturaleza/informacion-disponible/rednatura_2000_zepa_descargas.aspx</p> <p>Map of protected areas in Spain: https://www.europarc.org/news/2017/06/protected-areas-in-spain</p> <p>Map of watersheds and selected priorities (December 2001) of the Plan of Prioritized Actions to Hydrological and Forest Restoration, Soil Erosion Control and Combating Desertification. https://www.mapa.gob.es/es/desarrollo-rural/temas/politica-forestal/desertificacion-restauracion-forestal/lucha-contra-la-desertificacion/lch_pand_propuestas.aspx</p> <p>FSC-NRA-ES V1-1 https://ic.fsc.org/en/document-center/id/309</p>

	https://www.mapama.gob.es/ide/metadatos/ . UNESCO heritage sites in Spain: https://ich.unesco.org Global organisation monitoring HVC areas: https://hcvnetwork.org The common guidelines for the identification of high conservation values: https://hcvnetwork.org/library/common-guidance-for-the-identification-of-high-conservation-values/ https://ic.fsc.org/file-download.common-guidance-for-the-identification-of-hcv.a-295.pdf
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.1.2	The Biomass Producer has implemented appropriate control systems and procedures to identify and address potential threats to forests and other areas with high conservation values from forest management activities.
Finding	<p>During the process of approving the Forest Management (FM) plan or Authorization for Harvesting for a particular area, the HCVs are studied by forest engineers. This is related to any harvesting being conducted on the public and private properties. All the restrictions and prescriptions identified during these processes are reflected in the Forest Management Plan or Authorization. Concrete requirements are issued to the owner in writing, for instance describing the time of the year when it is now allowed to perform the harvesting, due to the breeding period of protected birds.</p> <p>The HCVs 1, 2, 3, 4 and 6 are considered by the Forest Service in the process of evaluating the Forest Management Plan or approving the Authorization for Harvesting. HCV 5 is perceived as a low risk and is not considered by the Forest Service, because there are no indigenous people in Spain and local communities does not depend on forest at the extent that basic needs could be threatened by forest management activities. On the contrary, it is considered that in Spain, the abandonment and depopulation of rural areas endangers the continuity of the local culture.</p> <p>The economic importance of Spanish forests is not significant; their production level is very low, leading to the abandonment of forest management, an increased risk of fires, pests and a greater impact of natural disasters. Forest management is</p>

	part of the culture in rural areas and should not be decreased but increased. To solve this problem, the forestry sector and industry should be strengthened.
Means of Verification	<p>Forest Service evaluations of HCVs are reflected in:</p> <ul style="list-style-type: none"> • Forest Management Plans; • Authorizations for Harvesting; • Contracts with public authorities (in case of work in public forest). <p>National and regional legislation in force. Online maps</p>
Evidence Reviewed	<p>Law 42/2007, of December 13, on Natural Heritage and Biodiversity https://www.boe.es/buscar/act.php?id=BOE-A-2007-21490</p> <p>Natura 2000 Network https://www.miteco.gob.es/ca/biodiversidad/temas/espacios-protegidos/red-natura-2000/rn_espana.aspx</p> <p>Statistics and maps on Nature in Spain: https://www.miteco.gob.es/ca/biodiversidad/servicios/banco-datos-naturaleza/default.aspx</p> <p>FSC-NRA-ES V1-1 https://ic.fsc.org/en/document-center/id/309</p> <p>Data of Sites of Community Importance (LIC): https://www.miteco.gob.es/ca/biodiversidad/temas/espacios-protegidos/red-natura-2000/rn_pres_tipos_lugares_LIC.aspx</p> <p>Forest Map of Spain Ministerio para la Transición Ecológica (Ministry for Ecological Transition) https://www.miteco.gob.es/es/biodiversidad/servicios/banco-datos-naturaleza/servidor-cartografico-wms-/default.aspx</p> <p>Areas of Special Protection for Birds (ZEPA), Ministry for Ecological Transition). https://www.miteco.gob.es/es/biodiversidad/temas/espacios-protegidos/red-natura-2000/zepa.aspx</p> <p>Over view of protected areas in Spain. Ministry for Ecological Transition) https://www.miteco.gob.es/es/biodiversidad/temas/espacios-protegidos/</p> <p>Map of watersheds and selected priorities (December 2001) of the Plan of Prioritized</p> <p>Actions to Hydrological and Forest Restoration, Soil Erosion Control and Combating Desertification. Http://www.magrama.gob.es/es/desarrollo-rural/temas/politica-forestal/img_mapa_prio_tcm7-25841.gif</p> <p>Data on nature in the Autonomous Community of Andalusia: https://www.researchgate.net/publication/236005734_Guia_tecnica_para_la_gestion_de_materiales_forestales_de_reproduccion_en_la_revegetacion_de_riberas</p>

	https://www.juntadeandalucia.es/andalucia/naturalezapaisajes.html
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.1.3	<p>The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not sourced from forests converted to production plantation forest or non-forest lands after January 2008.</p>
Finding	<p>Approximately 90% of the 18.5 million ha of forest land are considered semi-natural forests. Also, 1.54 million hectares of plantations of the total forested area are registered, of which 583,483 hectares are mainly covered of Eucalyptus spp. (MAPAMA 2014, in FSC NRA 2018).</p> <p>Species used for the biomass production are aleppo pine, umbrella pine, black pine, maritime pine, scots pine, radiata pine and mountain pine. The forest formed by these species belong to Mediterranean coniferous forests type and is found in the southern-central part of the Iberian Peninsula. This forest is a semi-natural forest, where only thinnings are carried out. Thus, the forest does not become a plantation, moreover, it is not harvested in full extent. It cannot be converted to a plantation or a non-forest land.</p> <p>There is no pressure on the semi-natural forests. Regarding FAO STAT data, the forest area in Spain has increased by 33.6% from 13.8 million ha to 18.5 million ha between 1990 and 2016.</p> <p>Spain has a clear legal framework and records on both the conversion of native forests into plantations (prohibited), and the conversion of forests into non-forest lands (authorisation needed).</p> <p>Changes in use from forestry to agriculture must be authorised by the Directorate General for the Natural Environment. The authorisation of changes in forest use is regulated at the state level by the Forestry Law (Law 43/2003 on Forestry, amended by Laws 10/2006, of 28 April and 21/2015, of 20 July), which states in:</p> <ul style="list-style-type: none"> Article 40, on Change in forest use and modification of vegetation cover: "The change in forest use of a forest when it is not brought about by reasons for general interest, and without prejudice to the provisions of article 18.4 and the applicable environmental regulations, shall be exceptional and shall require a favourable report from the competent forestry body and, where applicable, from the owner of the forest."

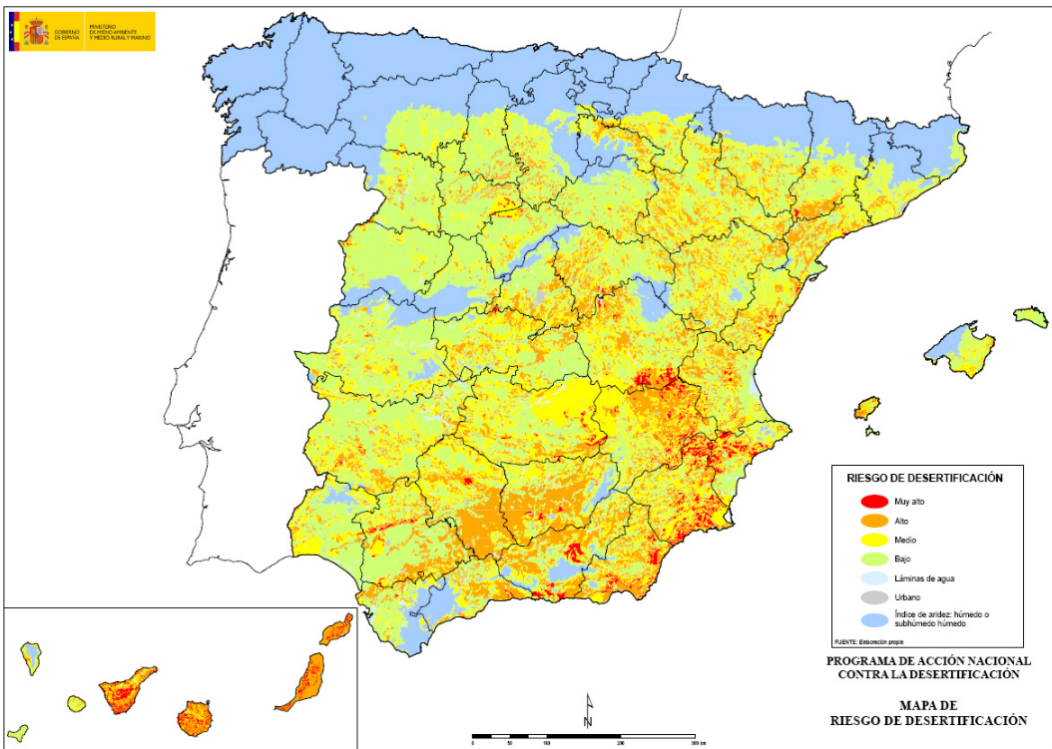
	<ul style="list-style-type: none"> Article 6 the concept of change in forest use as: “any material action of administrative act that causes the forest to lose its character as such”. <p>Therefore, this is an exceptional situation that requires the express authorisation of the competent authorities. The change to agricultural use could be authorised in those areas that have had a previous agricultural use. For other types of changes, conversion is only authorised in the case of special public interest.</p> <p>Eucalyptus is recognised as an invasive species in “The Andalusian Programme for the Control of Invasive Alien Species”. Since 1992 measures have been taken to approach the task of recovering areas of public forests. Since that year, eucalyptus has not been used in reforestation in public forests and thousands of hectares of eucalyptus have been recovered. Conversion of native forests with eucalyptus is low risk in Andalucía and other regions for over a decade.</p> <p>Conversion of natural forests</p> <p>Spain lost 191 000 hectares of its primary forest cover between 1990 and 2005. However, the law currently prohibits the conversion of natural forests to plantations or other non-forest land uses and such conversion does not currently occur in Spain (according to data from FAO, MAPA and SECF).</p> <p>Article 50 of Law 21/2015 on Forestry stipulates that the Autonomous Communities must guarantee the conditions for the restoration of burned forest land, and the following is prohibited:</p> <ul style="list-style-type: none"> Change in forest use for at least 30 years. Any activity inconsistent with the regeneration of the forest canopy, during the period determined by regional legislation. <p>Law 43/2003 on Forestry was amended in 2015 enabling the possibility of changing forest use where forests have been affected by fire, but only after 30 years. As this law has only been in force for a year and a half, the risk is not yet present.</p> <p>Soliva and its suppliers does not perform clearcutting operations. Material from Forest maintenance and selective harvesting operations carried out on converted plots from forests to plantations and from forests to non-forest use after Jan. 2008 is not be included as SBP compliant feedstock. It is be refused or physically segregated.</p> <p>Due to the following reasons, this indicator can be considered low risk:</p> <ul style="list-style-type: none"> Soliva uses forest management operations and tree species that exclude the possibility of material coming from converted autochthonous forest areas (to for example eucalyptus plantations). National and regional legislation are clear on forest conversions, and in average the forest area increased by 33.6% between 1990 and 2016.
Means of Verification	Species list of Soliva and its suppliers.

	<p>Approved Forest Management plan or relevant Authorization for Harvesting.</p> <p>Review of orthophotos from flights prior to 2008 and after.</p> <p>Existing legal framework. Laws, regulations and control bodies</p> <p>Forestry work/harvesting authorisation</p> <p>Cartography available and consultation with the competent bodies of the Autonomous Communities regarding transformations</p> <p>Management Plan, development project</p> <p>Signed agreements and contracts</p>
Evidence Reviewed	<p>Forestry Law consolidated text (Forestry Law 43/2003 amended by Laws 10/2006, of 28 April and 21/2015, of 20 July): https://www.mapa.gob.es/es/</p> <p>FAO statistics: http://www.fao.org/faostat/es/#data/EL</p> <p>Spanish Society of Forest Sciences: http://secforestales.org</p> <p>Montero, G. and SERRADA, R. 2013. La situación de los Bosques y el sector en España - ISFE 2013 Sociedad Española de Ciencias Forestales. Lourizán (Pontevedra). http://secforestales.org/content/informe-isfe</p> <p>7th Spanish Forestry Congress. The situation of forests and the forestry sector in Spain. ISFE 2017: https://7cfe.congresoforestal.es/content/la-situacion-de-los-bosques-y-el-sector-forestal-en-espana-isfe-2017</p> <p>Ministry of Agriculture, Fisheries and Food. National Forest Inventory. https://www.mapa.gob.es/es/desarrollo-rural/temas/politica-forestal/inventario-cartografia/inventario-forestal-nacional/default.aspx</p> <p>Andalusia Forest Service: http://www.juntadeandalucia.es/medioambiente/site/portalweb</p> <p>Removal of eucalyptus trees in public forests, Junta de Andalucía: https://www.juntadeandalucia.es/boja/1992/57/1</p> <p>Valencia: Law 5/2014, of 25 July, of the Generalitat, on Land Use Planning, Urban Planning and Landscape, of the Valencian Community</p> <p>Cartography and database of agricultural transformations of forest areas of the Valencian Community</p> <p>Removal of eucalyptus trees in public forests, Junta de Andalucía</p> <p>Law 8/2014 on Tax Measures, Administrative Simplification and Civil Service, Region of Murcia</p>
Risk Rating	<p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>

Comment or Mitigation Measure	
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	Indicator
2.2.1	The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them.
Finding	<p>By law, forest activities with certain characteristics and of a certain size must have an environmental impact report prior to the request for license activity. Environmental impacts of harvesting activities, like soil or water course damage, are well regulated in Spanish legislation. No reports on violations of this legislation were found.</p> <p>The assessment of environmental impacts of harvesting activities on the land or watercourses are well regulated in Spanish legislation. The environmental impact report for operations near water zones needs to be provided to the Forest Service when applying for the Authorization for Harvesting, otherwise it cannot be issued. The Autonomous Communities have their own personnel to carrying out law enforcement. Within the Civil Guard there is also the SEPRONA unit (Nature Protection Service), which carries out the enforcement of environmental laws.</p> <p>Environmental impact assessment projects are required by Law 21/2013, of 9 December. It indicates the obligation to develop an environmental impact assessment for any reforestation area project greater than 50 ha. Environmental assessments do not act as licences but as a prior and binding requirement to obtain a certain authorisation or resolution.</p> <p>Soliva and its suppliers only carries out thinnings (forest maintenance and selective harvesting operations) that are approved by the Forest Service and that are not a subject to environmental impact assessments. Soliva ensures that harvesting operations are authorized by the Forest Service. Besides that, to minimize the impact, Soliva and its suppliers always uses best forest management practices during harvesting operations.</p> <p>Therefore, the risk for this indicator is considered low.</p>
Means of Verification	<p>Existing developed legal framework. Laws, regulations and control bodies.</p> <p>Publicly available data from credible third parties</p> <p>Environmental impact assessment reports</p> <p>Authorization for Harvesting.</p> <p>Best practices in forest management.</p> <p>Technical specifications for the award of the contract for work in public forests</p> <p>Code of good practices in Sustainable Forest Management</p>

	Contracts with suppliers
Evidence Reviewed	<p>Law 21/2013, of 9 December, on environmental impact assessment https://www.miteco.gob.es/en/calidad-y-evaluacion-ambiental/temas/evaluacion-ambiental/legislacion/</p> <p>Environmental regulations of Spain https://gettingthedealthrough.com/area/13/jurisdiction/21/environment-spain/</p> <p>Murcia Forest Service: http://www.murcianatural.carm.es/web/guest/ambito-forestal</p> <p>Valencia Forest Service: http://www.agroambient.gva.es/es/web/medio-natural</p> <p>Castilla-la Mancha Forest Service: http://www.castillalamancha.es/tema/medio-ambiente/</p> <p>Andalusia Forest Service: http://www.juntadeandalucia.es/</p> <p>Catalunya Forest Service: http://agricultura.gencat.cat/ca/ambits/medi-natural/</p> <p>Aragon Forest Service: www.aragon.es/DepartamentosOrganismosPublicos/Departamentos/DesarrolloRuralSostenibilidad/AreasTematicas/</p> <p>Nature Protection Service (Spain) http://www.guardiacivil.es/es/institucional/Conocenos/especialidades/Medio ambiente/index.html</p> <p>SWOT analysis of forestry in Spain: https://riunet.upv.es/bitstream/handle/10251/64425/Valls%3BVall%C3%A9s-Plaells%3BGaliana%20-%20Sustainability%20of%20Mediterranean%20Spanish%20forest%20management%20through....pdf?sequence=1</p> <p>Guides and directives for environmental assessment: http://www.mapama.gob.es</p> <p>Spanish Association of Environmental Assessment:</p> <ul style="list-style-type: none"> Spanish association of environmental impact assessment http://www.eia.es National legislation: http://www.eia.es/nacional Autonomous Community legislation: http://www.eia.es/autonomica <p>FSC-NRA-ES V1-1 https://ic.fsc.org/en/document-center/id/309</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	<p>To ensure that important information is transmitted to forestry workers in the first field visit with workers, the document "Preliminary field inspection" will be completed and signed by all personnel present.</p> <p>In addition, Forestal Soliva, always performs inspections during forestry work, to verify that all standards are met.</p>

	Indicator
2.2.2	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b).
Finding	<p>Main problem of soil quality of Mediterranean forests is soil desertification and erosion. Desertification at present is mainly due to forest fires and erosion. Climate change will deteriorate soil fertility through a loss of carbon from the soil. Desertification can be combated through irrigation, tree species selection, fighting forest fires and reforestation.</p>  <p>The following particular conditions of large areas of Spain and the Mediterranean region are associated with desertification processes:</p> <ul style="list-style-type: none"> • The semi-arid climate in large areas, seasonal droughts, extreme variability of rains and sudden high intensity rains; • Poor soils with a marked tendency to erosion; • Uneven relief, with steep slopes and very diversified landscapes; • Loss of forest cover due forest fires.

The combination of factors and processes such as aridity, drought, erosion, forest fires, overexploitation of coastal areas, etc., gives rise to scenarios typical of desertification in Spain.

The European Court of Auditors (ECA) research indicates that up to 44% of Spain runs a great risk of soil erosion. According to JRC Science for Policy report “Condition of agricultural soil: Factsheet on soil erosion”, 2017, Soil degradation by water erosion is particularly significant in Spain (3.7 t/ha/year) in years 2000-2012.

Flood protection is addressed by the Flood Risk Prevention and Management Directive, which draws up Flood Risk Management Plans. Protection against erosion is addressed via the National Plan of Prioritized Actions to Hydrological and Forest Restoration, Soil Erosion Control and Combating Desertification. This plan designates the priority watersheds and develops programs and actions to be carried out. The plan is operating on more than 18.4 million hectares, of which 3.5 million are a priority.

Several laws in each Autonomous Community regulate management and harvesting, including specific technical limitations (among others, machinery to be used according to the soil conditions, etc.).

The afore mentioned legislation is complemented with a high degree of implementation. There are no published reports on significant impacts of forest activities. The increase of forest and artificial surfaces is considered an important factor for decreasing erosion. Regarding erosion, new forests on abandoned agricultural lands improve the soil quality.

The risk of erosion also depends on the kind of terrain where harvesting is conducted. Soliva applies specific forest management techniques and machinery in the mountain areas with the goal of avoiding erosion problems, that differs from the once on the plain terrain.

Another problem for soil quality in Spain is a loss of nutrients. However, this problem is mostly related to agricultural soils (Salinization due to the large scales irrigation systems, soil pollution by excessive use of fertilizers and pesticides, soil acidification where the industrial emission is clearly related to the decrease of the pH of the prone soil, soil degradation due to development of soil crust) and Eucalyptus plantations.

Regarding forestry, tillage is not that heavy as in agricultural sector. Best forest management practices are used by Soliva, as well as the prescriptions regarding soil quality in PGFs and Authorization of harvesting are fulfilled.

Within the pine forest stand, organic matter is always preserved on the harvesting site returning nutrients back in the soil. Accompanying vegetation like shrubs and grasses are always left on the harvesting site. The number of trees for harvesting can be limited in case there is a risk for soil quality.

According to the information above, it can be established that the forestry maintenance operations in pine stands do not damage the soil significantly and

	<p>that, within the framework of sustainable forest management and with appropriate environmental and forest management procedures, no significant damage to the soil is to be expected.</p> <p>However, mountain areas which cover a part of the supply base require a special attention in terms of erosion, as mentioned above. On the level of the regions this could be also considered a high risk, however, the BP undertakes number of specific measures to perform nondestructive forestry operation.</p>
Means of Verification	<ul style="list-style-type: none"> Existing legal framework. Laws, regulations and control bodies Available maps on the risk of erosion and desertification Code of good practices in Sustainable Forest Management; Good Environmental Practices in Sustainable Forest Management
Evidence Reviewed	<p>JRC Science for Policy report “Condition of agricultural soil: Factsheet on soil erosion”, 2017 http://publications.jrc.ec.europa.eu/repository/bitstream/JRC110011/agsol_deliverable_policy_report_final_-_pubsy_online_eur29020.pdf</p> <p>FAO Status of the World’s Soil Resources http://www.fao.org/3/a-bc595e.pdf</p> <p>Mass media: https://www.hortidaily.com/article/6040948/44-of-spain-runs-a-great-risk-of-soil-erosion/</p> <p>Comisión de Coordinación de Políticas de Cambio Climático (2007)</p> <p>Government of Spain. Quinta Comunicación Nacional de España</p> <p>IPCC (2007), in: EEA, JRC and WHO (2008)</p> <p>IPCC (2014) https://www.mapa.gob.es/es/desarrollo-rural/temas/politica-forestal/desertificacion-restauracion-forestal/lucha-contra-la-desertificacion/index.aspx</p> <p>Manual de buenas prácticas para el aprovechamiento integral de biomasa en claras sobre repoblaciones de Pinus sylvestris L. y Pinus pinaster Ait https://www.researchgate.net/publication/278687411_Manual_de_buenas_practicas_para_el_aprovechamiento_integral_de_biomasa_en_claras_sobre_repoblaciones_de_Pinus_sylvestris_L_y_Pinus_pinaster_Ait</p>
Risk Rating	<div> <input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA </div>

Comment or Mitigation Measure	<p>Soliva and its suppliers only obtains wood from thinnings (forest maintenance and selective harvesting operations) that are approved by the Forest Service. Within the forest stand, organic matter is preserved because no clear cuts performed. Vest forest management practices are always used by Soliva and it's suppliers.</p> <p>Forest engineers check the possibility of high risk of erosion and provide special instructions to the forest workers on the case to case basis. They fill in the check list every time when the work at the new harvesting site starts. After the work forest engineer check how well the instructions were fulfilled.</p>
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	Indicator
2.2.3	The Biomass Producer has implemented appropriate control systems and procedures to ensure that key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).
Finding	<p>As indicated in indicators 2.1.1. and 2.1.2., in Spain, there is a systematic legal framework for the protection of natural spaces and areas with high conservation values: “In accordance with Law 42/2007 on Natural Heritage and Biodiversity”. These are areas of the national territory, that comply with at least one of the following requisites and are declared as such:</p> <ul style="list-style-type: none"> • Contain systems or natural elements that are representative, unique, fragile, threatened or of special ecological, scientific, landscape, geological or educational interest. • Are especially dedicated to the protection and maintenance of biological diversity, geodiversity and associated natural and cultural resources.” <p>Spanish forests have a wide range of HCV in terms of biodiversity, water protection and other ecosystem services. (see 2.2.4) According to a report of the IUCN of 2013 the Biodiversity in Spain is at risk.</p> <p>All Autonomous Communities have legislation on vulnerable ecosystems: They are referred to as National Parks, Natural Parks, Nature Reserves, Natura 2000 Network Areas, Biosphere Reserves, etc. The protected area in Spain is 13% for natural areas and this increases to 28% if the Natura 2000 Network is included, with Spain being the country that contributes most to the Natura 2000 Network, the main instrument of European conservation policy. The protected areas cover both public and private forests. The Autonomous Communities have a wealth of information both on websites and in viewers and geographic information (GIS) on protected areas, priority ecosystems and habitat (Natura 2000 Network).</p> <p>All Autonomous Communities are preparing or have already a strategy for Biodiversity and Red Natura 2000 for horizon 2030.</p> <p>In Aragon a Forest Plan of Aragon for 2030 is in elaboration at the moment taking into account the strategy for biodiversity. “The Forestry Administration has highlighted the importance of the need for adequate consideration of sustainable uses in the management of biodiversity, particularly in the areas of the framework of the Protected Natural Spaces, as well as of the spaces included in the Natura 2000 Network where forest use covers an area of 1,372,028 hectares, which represents more than three quarters of those spaces.”</p> <p>Aragon states that “The existing overlap in the territory between the ENP (Espacios Naturales Protegidos) and the Natura 2000 Network makes it necessary to improve coordination between the two protection models. But there is also a need to improve coordination between the two spaces and management the fact that</p>

	<p>practically all the ENPs and 80% of the forest areas are located in the Natura 2000 Network are forest lands that have the condition of forest. This coordination is all the more necessary when the circumstance is that more than half of the forest habitats that are part of the Natura Network 2000 are forests managed by the Forestry Administration and more than 1 million of hectares of forest belong to the Network of Natural Spaces and/or to the Network Natura 2000. On the other hand, these Plans are not always well oriented in relation to with Sustainable Forest Management as evidenced in the elaboration of the Aragon Forest Plan.</p> <p>“Also, taking into account the relevance of agricultural uses, and forestry in protected areas and the Natura 2000 network, there is a need to deepen the degree of concreteness of the management instruments. In particular, a clear distinction must be made between the conditions for application of the different types of extensive or intensive livestock farming, as well as adapt the criteria in favour of Sustainable Forest Management and planning, the use of renewable energies or the application of new technologies in the energy sector.”</p> <p>Within the Civil Guard there is also the SEPRONA unit (Nature Protection Service), which carries out environmental police work. No reports have been published on relevant environmental damage related to forestry work/harvesting.</p> <p>Any harvesting activity that may affect rare or endangered species has limitations specified in the “Authorization for Harvesting”.</p> <p>In Andalusia an integrated strategy on biodiversity was developed in 2011.</p>
Means of Verification	<ul style="list-style-type: none"> • Information available on high conservation values in the GIS viewers of the Autonomous Communities (Natura 2000 Network, Protected Areas, Sites of Cultural Interest) • Existing legal framework. Laws, regulations and control bodies • Authorization for harvesting; • Technical Specifications for the allocation of the public forest works contract • Code of good practices in Sustainable Forest Management; • Good Environmental Practices in Sustainable Forest Management. • Results of the verification audits of Soliva
Evidence Reviewed	<p>Law 42/2007 on Natural Heritage and Biodiversity: https://www.boe.es/boe/dias/2018/07/21/pdfs/BOE-A-2018-10240.pdf</p> <p>All available legislation regarding biodiversity in Spain: https://www.miteco.gob.es/es/biodiversidad/legislacion/leg-espanola-generales.aspx</p> <p>Strategy on biodiversity and Red Natura 2000 towards 2030 (d.d. January 2019): https://www.aragon.es/estaticos/GobiernoAragon/Departamentos/AgriculturaGanaderiaMedioAmbiente/TEMAS_MEDIO_AMBIENTE/AREAS/BIODIVERSIDAD/ESTRATEGIA_BIODIVERSIDAD_RED NATURA2000_HORIZONTE2030.pdf</p> <p>Andalusia Strategy on biodiversity:</p>

	http://www.juntadeandalucia.es/medioambiente/portal_web/web/temas_ambientes/biodiversidad/static_files/estrategia_biodiversidad/eaigb.pdf IUCN report on Biodiversity risk in Spain: https://cmsdata.iucn.org/downloads/spain_s_biodiversity_at_risk_fact_sheet_may_2013.pdf
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.2.4	The Biomass Producer has implemented appropriate control systems and procedures to ensure that biodiversity is protected (CPET S5b).
Finding	<p>Spain is especially rich in fauna species in Europe due to its location on the southwestern edge of the European continent, just 14 km away from Africa. Around 95 species of land mammals inhabit Spain; some of the most valuable have already been mentioned. More than 270 species of birds breed in Spain each year, around 50 species of wintering birds and 30 species that use Spain as a migratory corridor. Also, almost 100 species of amphibians and reptiles, of which almost 40 are endemic to the country. In Spain there are about 50,000 species of insects and 1,500 species of spiders. As for flora, more than 8,000 plant species and subspecies have been identified within the Spanish territory.</p> <p>Spain hosts 48% of all the mammals that exist in Europe. Of these 111 species of mammals, 19% are threatened at the European level and at least an additional 11% are considered Near Threatened. The major threats at the European level that can possibly (or potentially) affect mammals in Spain are invasive and other problematic species, both native and non-native. Mammal populations are also highly threatened mainly by agricultural and forestry effluents and noise pollution. Hunting, trapping, logging and wood harvesting also pose serious threats to mammals in the country.</p> <p>Spain signed the Convention on Biological Diversity in June 1992 and is also a member of the rest of main environmental agreements (Ramsar, Bonn, CITES, Bern Convention, etc.). In Spain, the Convention's Strategic Plan for 2011-2020 has been adopted, which contains a long-term vision for 2050, a mission for 2020 and 20 operational targets for conservation and sustainable use of biodiversity.</p>

The IUCN Red list - Spain's biodiversity at risk (2013):

Number of species assessed within each IUCN Red List category at the European level

Species group	No. of sp. in Europe	No. of sp. in Spain	% of European sp. occurring in Spain	No. of threatened sp. in Spain (status at European level)		
				CR	EN	VU
Mammals	233	111	48%	4	4	10
Reptiles	140	62	44%	5	7	3
Amphibians	83	29	35%	1	1	3
Freshwater fishes	522	71	14%	5	9	12
Butterflies	435	234	54%	0	4	8
Dragonflies	137	79	58%	0	1	5
Saproxyllic beetles**	431	224	52%	0	6	5
Terrestrial molluscs**	1,233	418	34%	22	19	53
Freshwater molluscs	854	166	19%	11	8	23
Vascular plants**	1,826	839	46%	61	76	63
TOTAL	5,894	2,233	38%	109	135	185

**Not comprehensively assessed, selected species only.

This table does not include the Not Applicable (NA) species in Europe (species introduced after AD 1500 or species of marginal occurrence).
The data are based on the results of the European Red List (European region wide assessment).

Law 42/2007 on Natural Heritage and Biodiversity establishes the basic legal framework for the conservation, sustainable use, improvement and restoration of natural heritage and biodiversity, establishing a series of instruments for the knowledge and planning of natural heritage and biodiversity, such as the Spanish Inventory of Natural Heritage and Biodiversity, the Strategic Plan for Natural Heritage and Biodiversity and the Guidelines for the Management of Natural Resources.

Under the Law was developed a List of Wild Species under a Special Protection Regime, Spanish Catalogue of Endangered Species and Spanish Catalogue of Invasive Alien Species.

Ecologistas en Acción has prepared a national-level report evaluating compliance with the Aichi Biodiversity Targets (2011-2012) and concludes that in these two years it has not implemented the necessary measures to achieve the Aichi Targets by 2020 and urges the State to take measures to meet them.

Additionally, the Spanish Forestry Plan aims to integrate conservation criteria within sectoral policy planning and management, as well as within improvement, protection and restoration practices for forest areas and measures for the conservation and recovery of vulnerable or endangered species of wild fauna and flora.

Work is also being carried out for conservation of genetic biodiversity. The Spanish Strategy for the Conservation and Sustainable Use of Forest Genetic Resources has been adopted, as has legislation for marketing forest biodiversity. For species that are more economically valuable, seed inventories and banks have been developed.

In 2018, the government of Catalonia has launched the "Natural Heritage and Biodiversity strategy of Catalonia 2030", with new concepts and thorough ideas how to approach present reality and risks.

In Andalusia an integrated strategy on biodiversity was developed in 2011.

All the operations performed in the forest have to be approved by the Forest Service (through the approved Forest Management plan or Authorization). The restrictions are followed for particular

	areas and in certain seasons of the year, for example regarding the conservation of habitats. Best forest management practices are applied for the harvesting operations.
Means of Verification	<ul style="list-style-type: none"> Existing legal framework. Laws, regulations and control bodies List of Wild Species in Special Protection Regimes and the Spanish Catalogue of Endangered Species Forest Management Plans and authorizations for harvesting Publicly available information on the protection of species Code of good practices in Sustainable Forest Management Good Environmental Practices in Sustainable Forest Management
Evidence Reviewed	<p>List of Wild Species in Special Protection Regime and Spanish Catalogue of Endangered Species https://www.miteco.gob.es/es/biodiversidad/temas/conservacion-de-especies/especies-proteccion-especial/ce-proteccion-listado-situacion.aspx</p> <p>FSC-NRA-ES V1-1 NATIONAL RISK ASSESSMENT FOR SPAIN https://ic.fsc.org/en/document-center/id/309</p> <p>Ley de Montes 43/2003 https://www.boe.es/eli/es/l/2003/11/21/43/con</p> <p>IUCN Red List: https://www.iucnredlist.org/</p> <p>https://www.iucn.org/sites/dev/files/content/documents/spain_s_biodiversity_at_risk_fact_sheet_may_2013.pdf</p> <p>Convention on Biological Diversity: https://www.cbd.int/countries/profile/default.shtml?country=es</p> <p>Strategic Plan on Natural Heritage and Biodiversity, approved by Royal Decree 1274/2011</p> <p>Government of Catalonia, 2018, NATURAL HERITAGE AND BIODIVERSITY STRATEGY OF CATALONIA, 2030 http://mediambient.gencat.cat/web/.content/home/ambits_dactuacio/patrimoni_natural/estrategia_patrimoni_biodiversitat/Resum_ESNATURA_EN.pdf</p> <p>Andalusia's biodiversity strategy: https://www.juntadeandalucia.es/temas/medio-ambiente.html</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.2.5	The Biomass Producer has implemented appropriate control systems and procedures for verifying that the process of residue removal minimises harm to ecosystems.
Finding	<p>In Spain there are competent bodies carrying out the control tasks of the harvesting operations.</p> <p>The Authorization for Harvesting is issued by Forest Service of every community. Among other things, it regulates the waste management in every particular case. Burning of harvesting residues requires prior authorization as well.</p> <p>The Nature Protection Service (Spanish: Servicio de Protección de la Naturaleza, SEPRONA) is a unit of the Spanish Civil Guard responsible for nature conservation and management of the hunting and fishing industry. Among other things, they are also heavily involved in protection of natural spaces, and prevention and extinction of fires. In relation to this they carry out the survey how the waste management is carried out by the responsible for harvesting.</p> <p>So far, there was not any reports from both of the authorities specifying any damage to the ecosystems due to the harvesting operations, carried out under the legal frame and authorized by the Forest Service. Soliva and its suppliers only carries out work when the approval of the operations by the Forest Service is in place. The Nature Protection Service carries out the work as environmental police and can verify the compliance of the work performed to the authorization issued by the Forest Service.</p> <p>The important thing is that Soliva performs only thinnings, taking the whole tree out of the forest. Pruning and maintenance cuts are economically unjustified for the biomass industry. Tractor or skidder is removing the trees from the forest to the forest road and forwarder brings them to the roadside for drying. In this situation, there is almost no forest residues left in the forest, because no cross-cutting is conducted in the forest.</p>
Means of Verification	<p>Existing legal framework</p> <p>Publicly available information on the protection of ecosystems</p> <p>Regional, publicly available data from a credible third party (Forest Service and Nature Protection Service)</p> <p>Operational Assessment of measures designed to minimise impacts on the identified values</p> <p>Interviews with staff and forest holders</p>
Evidence Reviewed	<p>Nature Protection Service (Spain): http://www.guardiacivil.es/es/institucional/Conocenos/especialidades/Medio_ambiente/index.html </p>

	<p>Murcia Forest Service: http://www.murcianatural.carm.es/web/guest/ambito-forestal</p> <p>Valencia Forest Service: http://www.agroambient.gva.es/es/web/medio-natural</p> <p>Castilla-la Mancha Forest Service: http://www.castillalamancha.es/tema/medio-ambiente/</p> <p>Andalusia Forest Service: http://www.juntadeandalucia.es/</p> <p>Catalunya Forest Service: http://agricultura.gencat.cat/ca/ambits/medi-natural/</p> <p>Aragon Forest Service: www.aragon.es/DepartamentosOrganismosPublicos/Departamentos/DesarrolloRuralSostenibilidad/AreasTematicas/</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.2.6	<p>The Biomass Producer has implemented appropriate control systems and procedures to verify that negative impacts on ground water, surface water and water downstream from forest management are minimised (CPET S5b).</p>
Findings	<p>In Spain there are competent bodies carrying out the control tasks of the harvesting operations.</p> <p>The Authorization for Harvesting is issued by Forest Service of every community. Among other things, it regulates the water management in every particular case.</p> <p>The National Plan of Prioritized Actions to Hydrological and Forest Restoration, Soil Erosion Control and Combating Desertification, completed in 2004 and updated in 2007, is the planning instrument at the national level guiding the forest hydrological restoration actions developed by the Ministry of Agriculture, Fisheries, Food, mainly through agreements with the Autonomous Communities. This plan designates the priority watersheds and develops programs and actions to be carried out. The plan is operating globally on 18.4 million hectares, of which 3.5 million are a priority. An annex to the plan includes a map of selected watersheds and priority areas.</p> <p>Harvesting permits are issued by specific competent authority Consejería de Medio Ambiente y Ordenación del Territorio (Ministry of Environment and Planning). General Secretariat for Integral Management of Environment and Water, Department of Natural Spaces and Public participation.</p> <p>In public property areas, it is also necessary to obtain permission from the specific competent authority for the public property (e.g., watershed areas, roads, etc.). In addition, if the action affects a zone of Public Hydraulic Domain, an extra authorization to act in this area must be requested. and the competent technicians of the river basin can mark restrictions or mitigation measures.</p>

	<p>The FSC NRA for Spain states the following: “Forest activities with certain characteristics and of a certain size, as set out in the law, must have an environmental impact report prior to the request for license activity. Environmental impacts of harvesting activities, like soil or water course damage, are generally well regulated in Spanish legislation. As a major branch of forest policy in Spain has been and continues to be aimed at ensuring the supply of water in sufficient quantity and quality.”</p> <p>SEPRONA (Nature Protection Service) or Agentes Forestales / Medioambientales (Autonomous Communities controlling officers) are the organisations dealing with inspections and law enforcement.</p> <p>Nature conservation societies also have an active role in Spain and there are no reports about relevant environmental damages linked to harvesting activities.</p>
Means of Verification	<p>Existing legal framework. Laws, regulations and control bodies</p> <p>Technical Specifications for the allocation of the public forest works contract</p> <p>Authorisation for harvesting</p> <p>Code of good practices in Sustainable Forest Management</p> <p>Assessment of potential impacts at site level and assessment of the measures taken to minimise impacts</p> <p>Monitoring results</p>
Evidence Reviewed	<p>Water legislation in Spain: http://www.magrama.gob.es/es/agua/legislacion/</p> <p>Royal Legislative Decree 1/2001, of 20 October, approving the consolidated text of the Water Law: https://www.boe.es/eli/es/rdlg/2001/07/20/1/con</p> <p>Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32000L0060</p> <p>National forestry inventory plan: https://www.miteco.gob.es/es/cambio-climatico/temas/mitigacion-politicas-y-medidas/nfap_es_tcm30-485874.pdf</p> <p>GUÍA TÉCNICA PARA LA GESTIÓN DE MATERIALES FORESTALES DE REPRODUCCIÓN EN LA REVEGETACIÓN DE RIBERAS http://www.pfcyl.es/sites/default/files/biblioteca/griberas_dga_v_digital.pdf</p> <p>https://www.researchgate.net/publication/236005734_Guia_tecnica_para_la_gestion_de_materiales_forestales_de_reproduccion_en_la_revegetacion_de_riberas</p> <p>Andalusia regulatory authority: http://www.juntadeandalucia.es/medioambiente/site/portalweb</p> <p>Map of watersheds and selected priorities (December 2001) of the Plan of Prioritized Actions to Hydrological and Forest Restoration, Soil Erosion Control and Combating Desertification http://www.magrama.gob.es/es/desarrollo-rural/temas/politica-forestal/img_mapa_prio_tcm7-25841.gif</p>

Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.2.7	The Biomass Producer has implemented appropriate control systems and procedures for verifying that air quality is not adversely affected by forest management activities.
Finding	<p>Regarding this issue Spain has a legal framework based upon the European Air Quality Directive. The Spanish regulations and the surveillance procedures are carried out by the Autonomous Communities of Aragon, Catalunya, Castilla-La Mancha, Valencia, Murcia and Andalusia. The Autonomous Communities have their own personnel to carry out the control tasks.</p> <p>In Spain, on air quality in general, there are reports from the European Commission and NGOs that too little is being done with regard to air pollution control. There have been law-suites, because plans to reduce Ozon are missing at Autonomous Communities.</p> <p>Within the Civil Guard there is also the SEPRONA unit (Nature Protection Service). No reports have been published on relevant environmental damage related to forestry operations and harvesting.</p> <p>The greatest impacts on air quality in forests are caused by fires or emissions from nearby heavy industries. Neither of these two factors are a consequence of forestry harvesting operations and forest management activities.</p> <p>Regarding the scope of the work carried out by Soliva, the impacts on air quality are caused by the emissions from the machinery used to complete the work. Therefore, the work is not continuous in just one zone, so the impact is intermittent.</p> <p>When Soliva buys chips from other suppliers, under contract it demands the supplier to follow the Manual of Good Environmental and Forestry Practices and implement it. Soliva has a Manual of operating practices of the occupational risk prevention system and a Code of good environmental practices in Sustainable Forest Management.</p>

	Based on the foregoing, the risk related to this indicator is classed as low.
Means of Verification	<p>Existing legal framework. Laws, regulations and control bodies</p> <p>Manual of operating practices of the occupational risk prevention system</p> <p>Code of good environmental practices in Sustainable Forest Management</p> <p>Contracts with suppliers</p> <p>Monitoring results</p>
Evidence Reviewed	<p>https://www.captor-project.eu/en/a-spanish-court-forces-a-region-to-approve-air-quality-plans-for-the-first-time-in-history/</p> <p>European parliament, questions about air pollution in Spain: http://www.europarl.europa.eu/doceo/document//E-8-2016-002926_EN.html</p> <p>And lately an NGO is also asking for improvement of the quality of air in Spain: https://www.captor-project.eu/en/extension-of-the-complaint-against-spain-for-dropping-plans-to-reduce-ozone-levels</p> <p>Overview of Legislation and regulations on air quality in Spain: http://www.aragonaire.es/moreinfo.php?n_action=policy</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.2.8	The Biomass Producer has implemented appropriate control systems and procedures for verifying that there is controlled and appropriate use of chemicals, and that Integrated Pest Management (IPM) is implemented wherever possible in forest management activities (CPET S5c).
Finding	<p>Spain has a clear and effective legal framework and competent authorities that carry out the control tasks. The Spanish regulations and the surveillance procedures carried out by the Autonomous Communities are consistent. The Autonomous Communities have their own personnel to carry out inspections and law enforcement.</p> <p>Royal Decree 1644/2008, of 10 October, establishing the rules for the marketing and commissioning of machinery. Amended by Royal Decree 494/2012 of 9 March to include the risks of pesticide application</p>

Within the Civil Guard there is also the SEPRONA unit (Nature Protection Service). No reports have been published on relevant environmental damage caused by using chemicals linked to forestry operations.

To be able to apply biocides and chemical agents it is necessary to have a licence issued by a body recognised by the competent authority and to have completed training in this field.

To be able to apply biocides and chemical agents it is necessary to have a licence issued by a body recognised by the competent authority and to have completed training in this field.

Spain was the largest consumer of pesticides in Europe. In pine can prosper a problematic moth (pine processionary moth, *Thaumetopoea pityocampa*). An article of Forest Monitor (2017) describes the issue in Spain and alternative measures to pesticides use. To fight the processionary moth diversification of tree species should be pursued.

A study was conducted in Andalusia (Forest-monitor) the area between €1.0 and €1.5 million are spent annually on aerial spraying to control processionary outbreaks in our study region (87.300 km²) In addition, because aerial spraying is conducted in the winter following strong, heavy or massive defoliation, treatments are unlikely to limit growth losses or prevent further damage to trees by other organisms. Insecticide spraying cannot be considered a prevention for outbreaks if it is applied once the outbreak explodes. Spraying is sometimes done in pine forests located close to or within populated areas. Aerial spraying is however ineffective, but pheromone traps, hand removal, or application of high insecticide concentrations using truck or back-pack methods is justified given the risks of PPM larvae for human health (EPPO/CABI, 1997). Forest managers should shift from static to adaptive planning based on scientific evidence, monitoring systems and protocols.

The Royal Decree 1311/2012, of 14 September, is to establish the framework sustainable use of pesticides by reducing of the risks and effects of their use on human health and the environment. The Royal Decree is an answer to Directive 2009/128 / EC of the European Parliament, of October 21, 2009, which establishes a framework to achieve a sustainable use of pesticides. With this Directive, the European Union regulates the use of plant protection products. Royal Decree provides for protection of the environment and the drinking water, reducing risks in specific areas (habitats and aquatic species), and measures PPP use in areas outside of agriculture. Royal Decree establishes a ban on aerial spraying in general, allowing them, in special cases only, if authorized by territorial delegations.

Soliva has a Manual of operating practices of the occupational risk prevention system and a Code of good environmental practices in Sustainable Forest Management.

When Soliva buys chips from other suppliers, under contract it demands the supplier to follow the Manual of Good Environmental and Forestry Practices and to follow it and implement it in the work to be carried out.

Means of Verification	<p>Existing legal framework. Laws, regulations and control bodies</p> <p>Manual of good environmental practices</p> <p>Good Environmental Practices in Sustainable Forest Management</p> <p>Contracts with suppliers</p> <p>Information received from suppliers on the environmental assessment of the work</p> <p>Assessment of potential impacts at site level</p> <p>Assessment of the measures taken to minimise impacts</p> <p>Monitoring results</p> <p>Field visits to forestry work in progress</p>
Evidence Reviewed	<p>INVENTARIO DE DAÑOS FORESTALES (IDF) EN ESPAÑA. Red europea de Seguimiento de Daños en los Bosques (Red de Nivel I). RESULTADOS DEL MUESTREO DE 2018. https://www.mapa.gob.es/eu/desarrollo-rural/temas/politica-forestal/inventariodedanosforestales2017_tcm35-441605.pdf</p> <p>Forest Monitor, 2017. Spraying forests does not get anything: https://www.forest-monitor.com/en/spraying-forests-not-get-anything-processionary</p> <p>Quercus, 2015 It is not necessary to fumigate pine forests to control the processionary moth https://www.revistaquercus.es/noticia/4249/articulos-de-fondo/no-es-necesario-fumigar-los-pinares-para-controlar-a-la-procesionaria.html</p> <p>Junta de Andalusia. Integrated Fighting Plan against the Pine Processionary http://www.juntadeandalucia.es/medioambiente/site/portalweb/</p> <p>Junta de Andalusia. Sustainable use of phytosanitary products. https://www.juntadeandalucia.es/agriculturapescaydesarrollorural/raif/uso-sostenible-productos-fitosanitarios</p> <p>https://www.juntadeandalucia.es/organismos/agriculturaganaderiapescaydesarrollosostenible/areas/agricultura/sanidad-vegetal/paginas/productos-fitosanitarios-uso-sostenible.html</p> <p>Ministry of Health, Social Services and Equality:</p> <ul style="list-style-type: none"> Chemical substances legislation: https://www.mscbs.gob.es/en/ciudadanos/saludAmbLaboral/prodQuimicos/legislacion.htm Royal Decree 830/2010, of 25 June, which establishes the regulations governing training in biocide treatment: https://www.boe.es/eli/es/rd/2010/06/25/830 Ministry of the Presidency, Royal Decree 1311/2012, of 14 September, establishing the framework for action to achieve a sustainable use of plant protection products: https://www.boe.es/eli/es/rd/2012/09/14/1311/con Royal Decree 494/2012 of 9 March includes the risks of pesticide application as an

	amendment to Royal Decree 1644/2008, of 10 October, establishing the rules for the marketing and commissioning of machinery.
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	<p>Although this is low risk under the present legislation (Royal Decree 1311/2012, of 14 September) Soliva follows (and does not approve) inefficient use of pesticides against pine processionary moth (<i>Thaumetopoea pityocampa</i>). Aerial spraying of pesticides is forbidden, but in special cases can still be approved by the government.</p> <p>Last year there have not been aerial spraying in the forest areas of importance to Soliva. In case, this inefficient method would be used the feedstock coming from these forest areas would be excluded.</p>

	Indicator
2.2.9	The Biomass Producer has implemented appropriate control systems and procedures for verifying that methods of waste disposal minimise negative impacts on forest ecosystems (CPET S5d).
Finding	<p>There are laws in force that forbid any waste disposal in the forest, such as Law 22/2011 on “The contaminated soil by waste”.</p> <p>The Nature Protection Service (Spanish: Servicio de Protección de la Naturaleza, SEPRONA) is a unit of the Spanish Civil Guard responsible for nature conservation and management of the hunting and fishing industry. Among other things, they are also heavily involved in protection of natural spaces, and prevention and extinction of fires. In relation to this they carry out the survey how the waste management is carried out by the responsible for harvesting.</p> <p>The waste management system of Soliva is as follows:</p> <ul style="list-style-type: none"> • Urban waste: areas must be kept clean and free from residue of rubbish scattered in the floor. Urban waste must be collected and deposited in the nearest municipal container; • Hazardous waste. Proper management of hazardous waste begins at the moment the waste is generated, and all personnel are involved; • Do not mix hazardous waste. <p>Dispose of hazardous waste through an authorised waste management company</p> <p>Soliva also has a system implemented with the following elements in order to minimise the possible impacts of the works:</p> <ul style="list-style-type: none"> • Manual of good environmental practices, recommended conduct for its own workers and workers from subcontracted companies • Manual of operating practices of the occupational risk prevention system

	<ul style="list-style-type: none"> Code of good environmental practices in Sustainable Forest Management <p>When Soliva buys chips from other suppliers, under contract it demands the supplier to follow the Manual of Good Environmental and Forestry Practices and to follow it and implement it in the work to be carried out.</p> <p>In the inspections held by the public administrations at the end of the operations, they check that there are no wastes in the area. Forestal Soliva technicians always make a final visit to the area of action to verify that there is no waste or damage in the area.</p>
Means of Verification	<p>Contracts with suppliers</p> <p>Assessment of potential impacts at site level</p> <p>Assessment of the measures taken to minimise impacts</p> <p>Monitoring results</p> <p>Field visits to forestry work in progress</p>
Evidence Reviewed	<p>Existing legal framework. Laws, regulations and control bodies</p> <p>Manual of good environmental practices</p> <p>Good Environmental Practices in Sustainable Forest Management</p> <p>Legislation on waste management and prevention, regulations and planning: https://www.miteco.gob.es/es/calidad-y-evaluacion-ambiental/temas/prevencion-y-gestion-residuos/normativa-y-planificacion/ </p> <p>Law 22/2011 on the contaminated soil by waste: https://www.boe.es/eli/es/l/2011/07/28/22 </p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	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

The Forestry Act (Law 21/2015 of 20 July amending Act 43/2003 of 21 November on Forestry) is the legal basis for forest management. Most Autonomous Communities have their own forestry legislation that regulates the protection, management and use of forests in their territory.

Article 33 of the Forestry Act establishes the need for public utility forests and protection forests to have a Forest Management Plan, a work plan or an equivalent management tool. These documents shall be developed by the owner/holder and must always be approved by the regional forest organization. Where an approved management plan is effective, it shall establish the specific laws and regulations to be taken into account in the forest under consideration.

In general, in the case of non-protection private forests and public forests that are not catalogued, it is not compulsory to develop a management plan. The competent body of the autonomous community will regulate in which cases it is mandatory to have a forest management tool.

The different laws in each Autonomous Community regulate forest operations, use and specific technical limitations (type of logging, maximum allowable cutting area, machinery to be used according to the soil conditions, etc.), diameters (minimum and/or maximum), species and other parameters.

The available forestry statistics of national forestry inventory (IFN3) show a significant increase in timber stocks in Spain from inventory to inventory as a result of both the continued increase in forest area in recent decades and the improvement in forest cover.

Also, according to the reports produced by the Ministry's Forestry Service, the annual growth of wood in Spanish forests (45 million m³) is about three times greater than the amount harvested (15 million m³ per year). This balance, with an extraction rate of 35%, is maintained with the current data. However, the figures vary widely between Autonomous Communities and range from 10% to 88%. In all cases, the felling figures are lower than the growth figures.

The levels of harvesting are always well justified. In eucalyptus groves the entire cover is harvested at the end of the shift, while in pine groves, intermediate work and harvesting is carried out, although in all cases the harvesting levels are conservative, as confirmed by the statistics and reports.

In the 2012 figures, the extraction rate per Autonomous Community is shown below:

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

Comunidad Autónoma	Tasa de extracción (%)	Crecimiento (m³ x 1000)	Extracción (m³ x 1000)	Consumo de madera (m³ x 1000)	Tasa de Cobertura (%)	Sup. Arbolada (x 1000 ha)	Intensidad de cortas (m³/ha arbolada)
Andalucía	12	3.075	368	5.542	6,6	2.656	0,14
Aragón	6	2.760	171	893	19,1	1.578	0,11
Asturias	29	2.810	820	720	113,8	451	1,82
Baleares	5	222	10	728	1,4	186	0,05
Canarias	4	383	15	1.412	1,1	134	0,11
Cantabria	42	1.215	505	392	128,8	214	2,36
Castilla La Mancha	7	3.374	227	1.375	16,5	2.740	0,08
Castilla y León	20	7.204	1.470	1.707	86,1	2.982	0,49
Cataluña	15	3.964	615	4.957	12,4	1.626	0,38
Comunidad Valenciana	5	756	40	3.394	1,2	754	0,05
Extremadura	51	1.223	631	735	85,8	1.921	0,33
Galicia	58	13.057	7.619	1.862	409,2	1.405	5,42
La Rioja	6	728	42	215	19,5	170	0,24
Madrid	7	394	27	4.281	0,6	270	0,10
Murcia	1	237	2	982	0,2	316	0,01
Navarra	21	1.488	315	418	75,3	463	0,68
País Vasco	27	3.831	1.021	1.453	69,6	398	2,56
Total España	30	46.722	13.898	31.066	44,7	18.264	0,76

Fuente: MAGRAMA (2012)

Soliva performs only maintenance operations approved by the state authorities. Most of the forests within the supply base are in high need of maintenance operations. The operations that are being carried out focus on forest stand improvement. In no case clear cuts are made. Selective cuttings and maintenance operations secure the continuity of the forest, improve the quality of the stand, and enable natural forest regeneration. As a result, the net increment of wood within the forest increases.

Means of Verification

Management Plan, stocks and growth data
National or regional inventories, stocks and growth data.
Harvested volume data
Type of forestry operations

Evidence Reviewed

The following Ministries are involved in legislation of Forestry in Spain:
Ministerio de Agricultura, Pesca y Alimentación: <https://www.mapa.gob.es/en/>
Ministerio para la Transición Ecológica: <https://www.miteco.gob.es/en/>
Forestry statistics: <https://www.mapa.gob.es/es/desarrollo-rural/estadisticas/>
IFN3: <https://www.miteco.gob.es>

Castilla-la Mancha

Natural environment: <http://www.castillalamancha.es/tema/medio-ambiente/medio-natural>

Forest: <http://www.castillalamancha.es/tema/medio-ambiente/>

Catalunya

Forest Service an ecosystems: <http://agricultura.gencat.cat/ca/ambits/medi-natural/>

Aragon

Natural environment:

http://www.aragon.es/Temas/MedioAmbiente/AreasTematicas/1_Medionatural

Forest:

http://www.aragon.es/Temas/MedioAmbiente/AreasTematicas/2_Gestionforestal

Andalusia

Andalusia Forest Service: <http://www.juntadeandalucia.es/>

<http://www.juntadeandalucia.es/medioambiente/site/portalweb>

Natural environment:

<http://www.juntadeandalucia.es/medioambiente/site/portalweb/menuitem.d1a35641276b2bf2490a9d105510e1ca/?vgnextoid=fa99193566a68210VgnVCM10000055011eacRCRD>

The Andalusian measurements for the prevention and extinction of forest fires:

http://www.juntadeandalucia.es/justicia/portal/adriano/.content/recursosexternos/formacion_juecesIIIpresenciainfoca.pdf

Region of Murcia:

Natural Environment <http://www.murcianatural.carm.es/web/guest>

Forest: <http://www.murcianatural.carm.es/web/guest/ambito-forestal>

Valencia:

Natural Environment: <http://www.agroambient.gva.es/es/web/medio-natural>

Forest: <http://www.agroambient.gva.es/es/web/medio-natural/gestion-forestal>

Spanish Society of Forest Sciences: <http://secforestales.org>

Montero, G. and SERRADA, R. 2013. La situación de los Bosques y el sector en España - ISFE 2013 Sociedad Española de Ciencias Forestales. Lourizán (Pontevedra). <http://secforestales.org/content/informe-isfe>

7th Spanish Forestry Congress. The situation of forests and the forestry sector in Spain. ISFE 2017: <https://7cfe.congresoforestal.es/content/la-situacion-de-los-bosques-y-el-sector-forestal-en-espana-isfe-2017>

	ORDER of December 29, 2011, which regulates the use of forest biomass for energy use: https://www.juntadeandalucia.es/boja/2012/12/3
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.3.2	Adequate training is provided for all personnel, including employees and contractors (CPET S6d).
Finding	<p>The company is PEFC COC certified (multi-site 14-38-00168-BVC), training is one of the criteria.</p> <p>Soliva conducts all mandatory training to its own workers.</p> <p>For subcontractors and suppliers, Soliva requests that all documentation relating to the working conditions of workers, including through the Training Certificates and Information required in the field of Occupational Risk Prevention, be submitted for verification.</p> <p>According to legislation, every forest worker of Soliva need to receive training in Occupational Risk Prevention, with a 3-hour certificate each time someone is hired and renewed annually through an external prevention company.</p> <p>The training is provided to all employees: truck drivers, chainsaw drivers, forest laborers, etc</p> <p>In addition, Soliva implements a Manual of Good Forestry Practices which describes all the forestry work, the way to approach it, the preventive safety measures necessary and the correct procedure to follow in the event of an accident or emergency. Soliva certifies the training of its workers in this respect. Soliva checks its suppliers (on the performed trainings/certificates and field work).</p> <p>Certificate of training of each worker in occupational health and safety described in the Prevention Law issued by an alienate and accredited accident insurance company</p> <p>Based on the foregoing, the risk related to this indicator is classed as low.</p>
Means of Verification	<p>Existing legal framework. Laws, regulations and control bodies.</p> <p>Training records, course registration and training material.</p> <p>Monitoring of compliance with Employment and Social Security regulations.</p>

Evidence Reviewed	<p>Law 31/1995 on the Prevention of Occupational Risks: https://www.boe.es/eli/es/l/1995/11/08/31</p> <p>Royal Decree 39/1997 approving the Regulation of Prevention Services: https://www.boe.es/eli/es/l/1997/10/08/39</p> <p>Ministry of labour, migration & social security: http://www.mitramiss.gob.es/en/index.htm</p> <p>All legislation related to Employment and Social Security: https://www.boe.es/legislacion/codigos/codigo.php?id=93&modo=1&nota=0&tab=2</p> <p>The National Institute for Safety, Health and Wellbeing at Work (INSSBT) is the scientific and technical body of the State General Administration.</p> <p>At their website guidelines on safety can be found, including The Technical Guide for the Integration of Occupational Risk Prevention: http://www.insht.es/InshtWeb/Contenidos/Normativa/GuiasTecnicas/Ficheros/gu%C3%ADa%20t%C3%A9cnica%20integraci%C3%B3n.pdf</p> <p>Legislation of importance for forest work:</p> <ul style="list-style-type: none"> • Royal Decree 1215/1997, of 18 July, establishing the minimum health and safety requirements for the use of work equipment by workers. Modified by RD 2177/04, of 12 November, regarding temporary work at height. • https://www.boe.es/buscar/doc.php?id=BOE-A-1997-17824 • https://www.boe.es/buscar/doc.php?id=BOE-A-2004-19311 • ILO Convention 119 on the Protection of Machinery. 1963. • https://www.ilo.org/dyn/normlex/es/f?p=NORMLEXPUB:12100:0::NO:12100:P12100_INSTRUMENT_ID:312264:NO • Royal Decree 773/1997, of 30 May, on minimum health and safety requirements for the use of personal protective equipment by workers. • https://www.boe.es/buscar/act.php?id=BOE-A-1997-12735 • Royal Decree 486/1997, of 14 April, establishing minimum health and safety requirements in the workplace. • https://www.boe.es/buscar/act.php?id=BOE-A-1997-8669
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

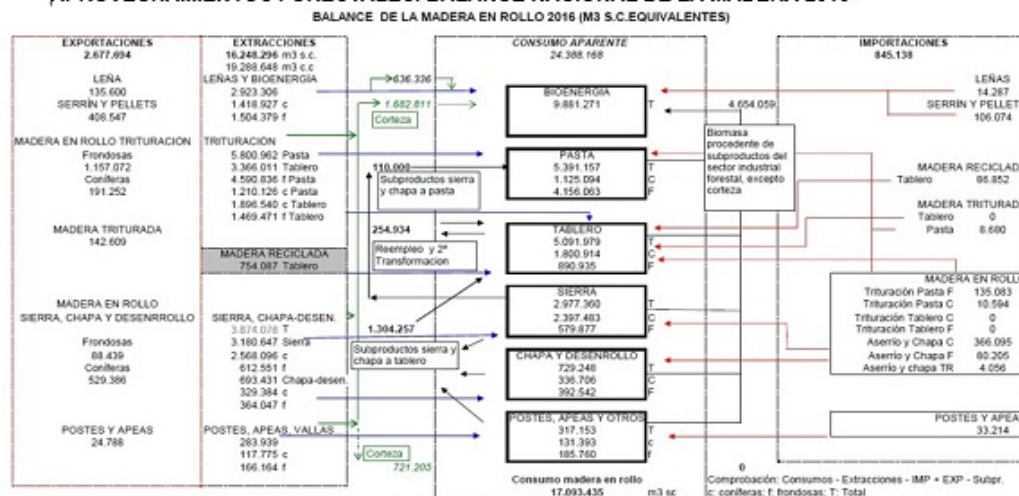
	Indicator																					
2.3.3	Analysis shows that feedstock harvesting and biomass production positively contribute to the local economy, including employment.																					
Finding	<p>The activity of the Spanish forestry industry has been considerably affected by the economic crisis, especially by the bursting of the housing bubble. The data indicate that the industry’s activity has been recovering in recent years, since 2012, although it is still a long way off the pre 2008 figures. Within this recovery, bioenergy plays an important role since it is mobilising many resources both for national use and for export, either in the form of chips or pellets. Foreign trade in the forestry sector presents a positive balance from 2012 to 2016.</p> <p>With regards to economic impacts and employment in the local economy of the Autonomous Communities, timber producing forests are scarce and income comes mainly from other products and services.</p> <p>Number of forestry companies in 2016:</p> <table><tr><th>Region</th><th>Amount of forestry related sole proprietorship</th><th>Total amount of forestry related enterprises</th></tr><tr><td>Andalucía</td><td>276</td><td>664</td></tr><tr><td>Aragón</td><td>83</td><td>182</td></tr><tr><td>Catalunya</td><td>32</td><td>85</td></tr><tr><td>Castilla-La Mancha</td><td>139</td><td>316</td></tr><tr><td>Valencia</td><td>259</td><td>373</td></tr><tr><td>Murcia</td><td>30</td><td>80</td></tr></table>	Region	Amount of forestry related sole proprietorship	Total amount of forestry related enterprises	Andalucía	276	664	Aragón	83	182	Catalunya	32	85	Castilla-La Mancha	139	316	Valencia	259	373	Murcia	30	80
	Region	Amount of forestry related sole proprietorship	Total amount of forestry related enterprises																			
	Andalucía	276	664																			
	Aragón	83	182																			
	Catalunya	32	85																			
Castilla-La Mancha	139	316																				
Valencia	259	373																				
Murcia	30	80																				
	<p>Source: ASEMFO Estudio de inversion y empleo en el sector forestall anos 2015-2016 (reference IEA 912, 2016, original source: Camerdata)</p> <p>Spain imports most of its wood, and demand is growing. The Forestry Sector has a great potential in the creation of rural employment. The domestic forestry sector should increase and considering the present circumstances, more economic activity could double employment in forestry, from the current 155 000 to around 300 000 jobs. Unemployment is a major problem in Spain (14,55% in 2018).</p> <p>This data is generated by the following wood logging figures in Spain (2015):</p>																					

Análisis autonómico de las cortas totales de coníferas y frondosas, 2015

Comunidades Autónomas	Coníferas (m3 cc)	Frondosas (m3 cc)	Total (m3 con)
Andalucía	102,759.32	7,660.00	110,419
Aragón	239,234.38	15,810.99	255,045
Canarias	728.00	1,835.10	2,563
Cantabria	134,623.29	247,420.59	382,044
Castilla La Mancha	266,850.00	38,335.00	305,185
Castilla y León	2,021,267.41	641,859.10	2,663,127
Cataluña	712,868.30	123,588.30	836,457
Comunidad de Madrid	15,339.01	915.24	16,254
Comunidad Foral de Navarra	307,960.00	141,152.00	449,112
Comunidad Valenciana	33,114.72	2,583.66	35,698
Extremadura	181,552.38	417,682.07	599,234
Galicia	3,523,400.00	4,706,650.00	8,230,050
Islas Baleares	7,163.05	1,751.43	8,914
La Rioja	108,225.00	45,824.00	154,049
País Vasco	1,332,606.61	145,597.02	1,478,204
Principado de Asturias	228,024.60	872,751.56	1,100,776
Región de Murcia	2,680.00		2,680
ESPAÑA	9,218,396	7,411,416	16,629,812

National balance of wood, 2016:

APROVECHAMIENTOS FORESTALES. BALANCE NACIONAL DE LA MADERA 2016



The population employed in fields related to the forestry sector represented 5.7% of the total employed population in 2016. This percentage has remained fairly constant since 2008. It is expected, that these percentages will increase, because of employment generated by the increased use of sustainable energy, such as biomass, as also a greater enhancement of the multifunctionality of forestry.

Andalucía:

Andalusia is the Autonomous Community that in absolute terms generates and also historically has a larger amount of contracts in the primary forest sector, significant more than others, around 18,000 contracts, which is more than double the number of contracts than Castilla-La Mancha, Extremadura or Galicia, which are the Communities that follow in importance in terms of the total number of contracts in this sector.

In absolute terms Andalusia is the one with the highest number of contracts in the set of professional categories that carry out "field" forest work, assuming more than 98% of the total of their contracts in this sector, which reflects the special importance of these professional categories in this Community. Although at a considerable distance, these categories also stand out in absolute figures in Communities such as Castilla-La Mancha and Extremadura (in which they account for around 90% of contracts), or Galicia and Castilla y León (in both more than 96% of contracts).

Contratos realizados en el sector forestal primario

Distribución de los contratos (media 15-16)



Fuente: SEPE, Observatorio ocupacional.

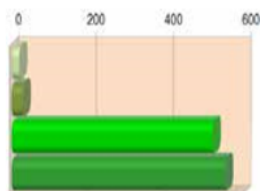
Contrato de Ocupación	13	14	15	16	MEDIA 15-16
Ingenieros de Montes y Directores de producción de explotaciones agropecuarias y forestales*	131	169	162	172	167
Ingenieros Técnicos Forestales y del Medio Natural	88	126	123	70	97
Trabajadores cualificados en actividades forestales y del medio natural*	7.907	10.344	9.001	9.662	9.332
Peones forestales y de la caza	7.544	10.125	8.948	7.831	8.390

* Ver apartado Metodología.

Aragon:

Contratos realizados en el sector forestal primario

Distribución de los contratos (media 15-16)



Fuente: SEPE, Observatorio ocupacional.

Contrato de Ocupación	13	14	15	16	MEDIA 15-16
Ingenieros de Montes y Directores de producción de explotaciones agropecuarias y forestales*	15	24	27	21	24
Ingenieros Técnicos Forestales y del Medio Natural	11	10	36	30	33
Trabajadores cualificados en actividades forestales y del medio natural*	500	410	545	501	523
Peones forestales y de la caza	811	612	601	508	555

* Ver apartado Metodología.

Castilla-La Mancha:

Contratos realizados en el sector forestal primario

Distribución de los contratos (media 15-16)



Fuente: SEPE, Observatorio ocupacional.

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

* Ver apartado Metodología.

Catalunya:

Contratos realizados en el sector forestal primario

Distribución de los contratos (media 15-16)



Fuente: SEPE, Observatorio ocupacional.

Contrato de Ocupación	13	14	15	16	MEDIA 15-16
Ingenieros de Montes y Directores de producción de explotaciones agropecuarias y forestales*	28	23	39	38	39
Ingenieros Técnicos Forestales y del Medio Natural	71	135	73	85	79
Trabajadores cualificados en actividades forestales y del medio natural*	1.161	1.317	1.680	1.048	1.364
Peones forestales y de la caza	2.407	2.043	1.643	1.275	1.459

* Ver apartado Metodología.

Valencia:

Contratos realizados en el sector forestal primario

Distribución de los contratos (media 15-16)



Fuente: SEPE, Observatorio ocupacional.

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

* Ver apartado Metodología.

Murcia:

Contratos realizados en el sector forestal primario

Distribución de los contratos (media 15-16)



Fuente: SEPE, Observatorio ocupacional.

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

* Ver apartado Metodología.

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

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

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

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



The impact of the work carried out by Soliva covers both forestry harvesting in private forests and the mobilisation of resources from Public Administrations. Studies related to thinnings operations prove the yield of the stands improve, and thus also the economy. Soliva incorporates local workers in its harvesting teams. The displacement of the teams has a positive impact on local economies.

Means of

Analysis of the contribution to the local economy.

Verification	<p>Description of the direct economic value created</p> <p>Records of personnel and jobs created</p> <p>Records of economic activity of Soliva in the selected regions.</p>
Evidence Reviewed	<p>ASEMFO, Employment and investment study in the forestry sector: http://www.asemfo.org/empresas/asemfo/X_estudio_DEF_web.pdf</p> <p>Statistics on the forestry sector: https://www.mapa.gob.es/es/desarrollo-rural/estadisticas/Est_Comercio_Exterior.aspx https://www.mapa.gob.es/es/desarrollo-rural/estadisticas/forestal_aprovechamientos.aspx</p> <p>Forestry economy and foreign trade (2016): https://www.unece.org/fileadmin/DAM/timber/country-info/statements/Spain2016.pdf</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.4.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that the health, vitality and other services provided by forest ecosystems are maintained or improved (CPET S7a).
Finding	<p>The introduction of foreign pests and pathogens and climate change are currently the main threats to the health of our forests, along with forest fires.</p> <p>There is a systematic legal framework, with action plans implemented at government level to manage the main problems detected and a data monitoring network (European Forest Damage Monitoring Network). In addition, the level of control by the forestry authority is medium/high throughout the whole country. Therefore, the Spanish regulations and the surveillance procedures carried out by the Autonomous Communities are coherent. Additionally, Soliva implements Good Environmental Practices in Sustainable Forest Management and performs only thinnings (forest maintenance and selective harvesting operations), frequently carried out manually. That helps to keep the minimal influence on health and vitality of the forest.</p>

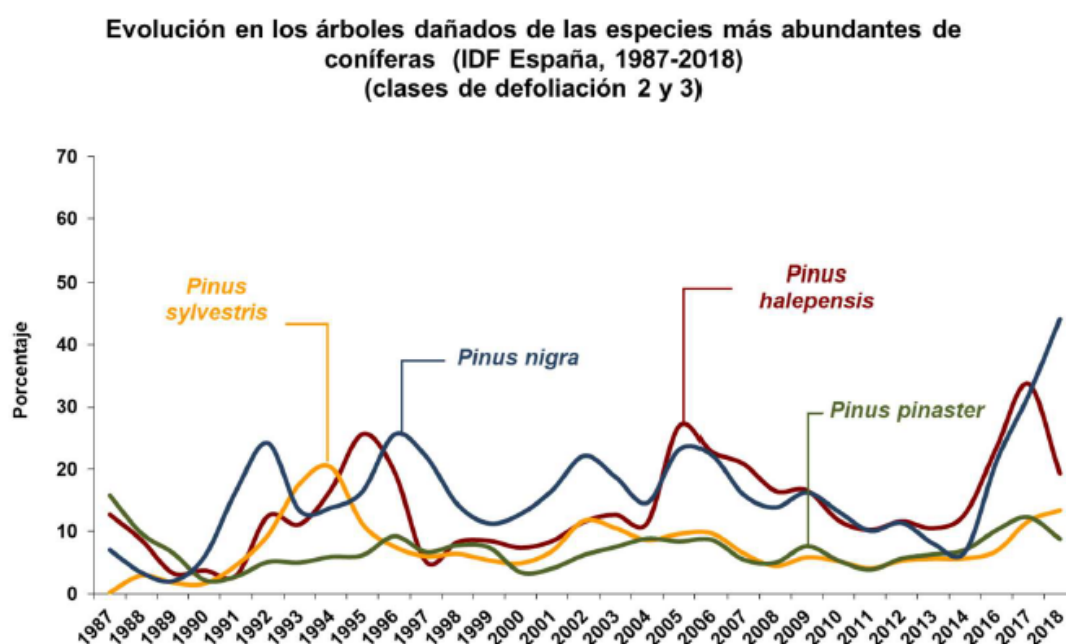
According to current reports, the phytosanitary situation of Spanish forests has recently worsened due to drought. The introduction of foreign pests and pathogens and climate change are currently the main threats to the health of our forests, along with forest fires.

Changes in climate are changing the dynamics of alterations caused by native insects and forest pathogens, as well as facilitating the establishment and spread of introduced species of pests. Such changes in the dynamics of alterations, coupled with the direct impact of climate change on trees and forest ecosystems, can have negative effects and increase the vulnerability of forests to other disturbances.

The introduction of dangerous invasive alien species into the forests continues. New organisms, such as the bacterium (*Xylella fastidiosa*), the chestnut gall wasp (*Dryocosmus kuriphilus*) or the western conifer seed bug (*Leptoglossus occidentalis*), have recently joined other quarantined organisms detected, such as the pine wood nematode (*Bursaphelenchus xylophilus*) or the pine pitch canker (*Fusarium circinatum*).

From the results obtained in 2018, it can be observed that the Communities that have the highest percentage of trees in the category of damaged are: Madrid, Balearic Islands, Castilla la Mancha and Aragon.

The chart below shows how the percentage of trees with more than 25% defoliated canopy. The species that has shown the most improvement is the Aleppo pine (*Pinus halepensis*), a species that has been seriously affected in the last two years, and which has increased its percentage of healthy trees by almost 15%.



Yearly a forest damage inventory is carried out related to the European Forest Damage Network Level I inventory. Detailed information about damages in the

forest per region are available, the pest and other damaging factors related to *Pinus halepensis* per region are mentioned below.

Andalusia

The pine processionary moth: There has been a noticeable decrease in the damage caused by this agent, although there have been detected defoliations of consideration in certain locations. There have been slight and moderate damage observed on *Pinus pinea* and *Pinus halepensis* in the Sierra de los Andes and some slight damage in Caniles (Granada).

Mushrooms: On large adult pines, fruiting bodies are still observed of the rotting fungus *Trametes sp.* They have been observed, on *Pinus halepensis*, in Arroyo del Hombre, in the Natural Park of Cazorla, Segura and Las Villas, Huesca, Pozo Alcón, Santiago de la Espada, close to the Bolera Reservoir and Villanueva del Archbishop (Jaén).

Drought: With respect to the pine forests, the main masses affected are those of Aleppo pine (*Pinus halepensis*) in the following locations: Vélez Blanco (Almería); Albuñuelas, Caniles, Castillejar, Moclín, Puebla de Don Fadrique and Zújar (Granada); Benatae, Huesca, Orcera, Pozo Alcón, Santiago de la Espada, Santo Tomás, Torre del Campo and Villanueva del Arzobispo (Jaén) and in the Montes de Málaga Natural Park (Málaga).

Snow and wind: In the pinewoods, damage has been detected to the Aleppo pine (*Pinus halepensis*) in Vélez Blanco (Almería); Caniles, Castillejar and Zújar (Granada); Santiago de la Espada and Santo Tomás (Jaén).

Aragon

Serious damage caused by this lepidoptera has been observed, moderate defoliation of *Pinus halepensis* in Caspe, Fuendetodos, Mequinenza and Tauste (Zaragoza). Also on Aleppo pine, defoliations have been observed along the A-1102 road towards Castejón de Valdejasa.

Fungi: On large adult pines, fruiting bodies are still observed of *Trametes sp.* Also, in masses of *Pinus halepensis* in Sierra Gorda, in the vicinity of Fuendetodos and Puebla de Albortón (Zaragoza); as well as in Santa Cilia de Jaca (Huesca), on *Pinus nigra*, fruiting bodies have been detected.

Drought: Old dry twigs have been observed in pine forests of Aleppo pine (*Pinus halepensis*) in Albalate del Arzobispo, Andorra, Belmonte de San José, and Valderrobres (Teruel); as well as in Ariza, Borja, Caspe, Fabara, Fuendetodos, Mequinenza, Nonaspe and Tauste. (Zaragoza).

Due to snow and wind Branch breaks and some Aleppo pine shafts have been detected (*Pinus halepensis*) in Andorra, Belmonte de San José and Valderrobres (Teruel), in Fabara, Fuendetodos and Nonaspe (Zaragoza).

Castilla – La Mancha

On Aleppo pine (*P. halepensis*) moderate defoliations can be observed. on the CM-2251 road towards Santa Cruz de Moya and lightly over Aleppo pine in Aliaguilla (Cuenca).

Defoliating insects of the type *Brachyderes sp.* In Castilla La Mancha the defoliations more

have been observed in Albacete and Nerpio (Albacete), on *Pinus halepensis*.

Fungi: On large adult pines, fruiting bodies are still observed of the rotting fungus *Trametes sp.*, little damage has been observed to *Pinus halepensis* in Alarcón and Bueache de Alarcón, La Pesquera, Minglanilla and Villar del Humo.

Due to drought damage has been observed on Aleppo pine (*Pinus halepensis*) in Albacete, Carcelén, Casas de Ves, Nerpio and Yeste (Albacete); La Pesquera, Minglanilla and Santa Cruz de Moya (Cuenca).

Snow and wind caused damages on Aleppo pine (*Pinus halepensis*) on the N-322 towards Casas de Ves (Albacete); as well as on the CM-200 road in Barajas de Melo (Cuenca).

In Castilla La Mancha, damage can be observed from wild livestock (deer and wild boar) on pine trees in Nerpio.

Catalonia

The pine processionary moth: Its presence has been much less than that detected in the valuations of 2017, when in enough points of the Pyrenees and Pre-Pyrenees, and in regions of the Pyrenees.

According to information provided by DARP technicians, the processionary attacks of the year

(cycle 2017-2018) were very important in the regions of Berguedà, Solsonès, Bages, Moianès, Pallars Jussà, Alta Ribagorça, Cerdanya and Alt Urgell, some 100,000 ha were estimated to have been affected, on which action was taken by aerial treatments in autumn-2016 and autumn-2017 on about 20,000 ha, using a microbiological formula based on *Bacillus thuringiensis* var. *Kurstaki*. For this autumn-2018 the DARP also plans for air treatment in the most affected areas; comarcas are the same as for 2016-2017. Due to the severe drought in summer 2017, in the 2018 valuations it was easy to observe the presence of pines, especially *Pinus nigra* and in the interior regions, with very low foliar density and in a state of decadence, and very significant weakness; it is easy for these pines to die in the coming months.

Scholititides: The presence of drillers has been detected in isolated feet in forest masses of *Pinus halepensis* in Tarragona, with attacks by *Tomicus* and *Orthotomicus*.

Fungi: *Sirococcus conigenus* Slight damage detected on *Pinus halepensis* in Monistrol of Caldés (Barcelona).

Arceuthobium oxycedri: Mistletoe attacks are also a cause of the weakening of conifers and a consequence of the abandonment of traditional forestry activities. About Pino Aleppo mistletoe infestations have been observed in Granadella and Pobla de Ciérvoles (Lleida), as well as in Batea, Cabacés, Corbera de Ebro and Horta de Sant Joan (Tarragona).

Drought: Damage to *Pinus halepensis* in Aguilar de Se, Begas, Llíssa de munt, Mediona, Monistrol de Caldés, Navás and San Martín de Centellas (Barcelona); Camós, Maiá de Montcal, Viladeséns (Girona); Granadella and Pobla de Ciérvoles (Lleida); Batea, Bisbal del Penedés, Cabacés, Corbera de Ebro, Horta de Sant Joan, Santa Coloma, Tortosa and Vimbó (Tarragona).

Murcia

Pine processionary moth: moderate defoliations have been detected on Scots pine (*Pinus sylvestris*) and Aleppo pine (*Pinus halepensis*) on the RM-702 between Archivel and the road to Nerpio.

Other insects: Defoliating insects of the type *Brachyderes sp.* in the Region of Murcia have been found damages in Caravaca, Cieza and Murcia on *Pinus halepensis*.

Drought: The water stress damage recorded last year is less severe, although it is not as severe. dry twigs have been observed in forest of Aleppo pine (*Pinus halepensis*) that vegetated in the worst locations, as can be seen in Caravaca, Cieza, Lorca, Moratalla, Mula and Murcia (A.R. Cresta del Gallo).

Snow and wind: Broken branches of Aleppo pine (*Pinus halepensis*) have been observed by

wind and snow in Caravaca, Jumilla, Moratalla, Mula and Murcia.

Valencia

Pine processionary moth: On Aleppo pine (*Pinus halepensis*) the defoliations produced by the lepidoptera have been moderate in the CV-442 in La Portera and in the vicinity of the airport of El Altet (Alicante); while on the CV-395 road between Requena and Chera (Valencia), slight damage can be seen.

Fungi: On large adult pines, bodies are still being observed of fructification of the rotting fungus *Trametes sp.* the presence of this fungus has been detected agent in adult forests of *Pinus halepensis* in Buñol, Chiva, Quesa and Requena (Valencia).

Drought: Drought damage has abated considerably in aleppo pine forests of the Community, although damages are high in soils with worse conditions, steep slopes and sunny orientations. This has been observed in Elche, Pinoso and Villena (Alicante); in Lucena del Cid (Castellón) and in Andilla, Buñol, Chelva, Chiva, Cofrentes, Quesa, Requena, Siete Aguas, Sinarcas and Utiel (Valencia).

Snow and wind: Numerous breakages of branches and shafts of Aleppo pine (*Pinus halepensis*) by snow in Pinoso and Villena (Alicante); in the CV-208 between Montanejos and Barracas.

	<p>(Castellón); in Andilla, Cofrentes, between Aliaguilla and Garaballa, along the CV-390 road; in Benagéber, on the CV-395 between Chera and Requena, Sieteaguas, Sinarcas and Utiel (Valencia).</p> <p>Hail: Severe defoliations have been detected along the CV-208 road from Montanejos to Barracas, affecting Aleppo pine (<i>Pinus halepensis</i>), Scots pine (<i>Pinus pinaster</i>) and holm oaks (<i>Quercus ilex</i>).</p> <p>There is a systematic legal framework, with action plans implemented at government level to manage the main problems detected and a data monitoring network (European Forest Damage Monitoring Network). In addition, the level of control by the forestry authority is medium/high throughout the whole country. Therefore, the Spanish regulations and the surveillance procedures carried out by the Autonomous Communities are coherent.</p> <p>The scope of this evaluation is the impact/effect of forestry operations on the indicators assessed. Forestry operations normally have a positive impact on the control of forest diseases such as pine wood nematode, since one of the control measures is to reduce the plants that show signs of deterioration.</p> <p>Furthermore, as already mentioned, there are manuals of good forestry practices implemented, monitoring results, examples of implementing legislation, reports and action plans related to the main diseases and pests.</p> <p>It is concluded that the situation is being addressed and the risk related to this indicator is low.</p>
Means of Verification	<p>Existing legal framework. Laws, regulations and control bodies</p> <p>Assessment of the potential impacts of forestry operations on the health and vitality of forests.</p> <p>Assessment of potential impacts at site level and of the measures taken to minimise them</p> <p>Good Environmental Practices in Sustainable Forest Management</p> <p>Contracts with suppliers</p> <p>Information received from suppliers</p> <p>Monitoring results</p> <p>Consultation with experts</p>
Evidence Reviewed	<p>Spanish Society of Forest Sciences: http://secforestales.org</p> <p>Montero, G. and SERRADA, R. 2013. La situación de los Bosques y el sector en España - ISFE 2013 Sociedad Española de Ciencias Forestales. Lourizán (Pontevedra). http://secforestales.org/content/informe-isfe</p>

	<p>7th Spanish Forestry Congress. The situation of forests and the forestry sector in Spain. ISFE 2017: https://7cfe.congresoforestal.es/content/la-situacion-de-los-bosques-y-el-sector-forestal-en-espana-isfe-2017</p> <p>National publications/reports published with regard to ICP Forests data and/or plots</p> <p>European Forest Damage Network, Level I:</p> <ul style="list-style-type: none"> - Forest Damage Inventory 2017 (Inventario de Daños Forestales 2017) https://www.mapa.gob.es/es/desarrollo-rural/temas/politica-forestal/inventario-cartografia/redes-europeas-seguimiento-bosques/red_nivel_I_resultados.aspx - Maintenance and Data Collection. European large-scale forest condition monitoring (Level I) in Spain: 2017 Results. (Mantenimiento y toma de datos de la Red Europea de seguimiento a gran escala de los Bosques en España (Red de Nivel I): Resultados 2017). https://www.mapa.gob.es/es/desarrollo-rural/temas/politica-forestal/inventario-cartografia/redes-europeas-seguimiento-bosques/red_nivel_I_danos.aspx <p>European Forest Damage Network, Level II European intensive and continuous monitoring of forest ecosystems, Level II. 2016 Report. (Red europea de seguimiento intensivo y continuo de los ecosistemas forestales, Red de Nivel II). https://www.mapa.gob.es/es/desarrollo-rural/temas/politica-forestal/inventario-cartografia/redes-europeas-seguimiento-bosques/red_nivel_II_resultados.aspx</p> <p>MAPA:</p> <p>Plant Health: https://www.mapa.gob.es/es/agricultura/temas/sanidad-vegetal/default.aspx</p> <p>Pine Wood Nematode: https://www.mapa.gob.es/es/agricultura/temas/sanidad-vegetal/nematodo-de-la-madera-del-pino/</p> <p>Law 43/2002 on Plant Health: https://www.boe.es/eli/es/l/2002/11/20/43</p> <p>Andalucía, Plant Health: https://www.juntadeandalucia.es</p> <p>Valencia, Plant Health: http://www.agroambient.gva.es/es/sanidad-vegetal</p> <p>Murcia, Plant Health: https://www.carm.es/web/pagina?IDCONTENIDO=222&IDTIPO=140&RASTRO=c32\$m</p> <p>Aragon, Plant Health: https://www.aragon.es/</p> <p>Castilla-La Mancha, Plant Health: http://www.castillalamancha.es</p> <p>Catalunya, Plant Health: http://agricultura.gencat.cat/ca/ambits/agricultura/dar_sanitat_vegetal_nou/</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

Comment or Mitigation Measure	
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	Indicator
2.4.2	The Biomass Producer has implemented appropriate control systems and procedures for verifying that natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b).
Finding	<p>With regards pests and diseases, see indicator 2.4.1 which certifies the existence of a clear, regulatory framework, action plans and data monitoring networks, and competent administrations responsible for data management and control. Therefore, it is generally considered that there is adequate pest and disease management in place, bearing in mind that a large part of the responsibility in this regard lies with public administrations.</p> <p>With regards forest fires, it cannot be denied that that they currently represent one of the greatest threats to forests in Spain. Between 1990 and 2010, the annual average number of forest fires was 17,864, with a maximum of 25,557 in 1995. During the same period, the annual average area burned was 139,775 ha, of which approximately 51,000 ha were forested areas, and 88,000 ha were areas without trees.</p> <p>Climate change is expected to affect, and probably already does affect, the susceptibility of forests to disturbances, as well as the frequency, intensity, duration and timing of these disturbances. For example, there may be increased fuel accumulation in forests, the fire seasons may last for longer and more extreme weather conditions may occur more frequently. In addition, the frequency and intensity of forest fires is also expected to increase.</p> <p>The current trend is for forests to offer an increasingly dangerous vegetation structure in this regard, as they accumulate the fine biomass that was once used to cover livestock feed and heating requirements, and have a greater spatial continuity of forest fuel, taking into account the vegetation being installed in previously ploughed fields.</p>

En la Tabla 1 se expone un resumen de las cifras relativas a siniestros y superficie forestal quemada por incendios forestales en el periodo 2005-2016:

Año	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016*
Conatos (<1ha)	16.475	10.741	7.523	7.300	9.866	7.812	10.815	10.438	7.708	6.610	7.786	6.479
Incendios (≥1ha)	9.017	5.593	3.413	4.355	5.777	3.910	5.599	5.540	3.089	3.196	4.167	2.338
Total siniestros	25.492	16.334	10.936	11.655	15.643	11.722	16.414	15.978	10.797	9.806	11.953	8.817
Superf. forestal afectada (ha)	188.697	155.345	86.122	50.322	120.094	54.770	102.161	216.894	61.691	48.718	108.884	65.817
Grandes incendios (≥500 ha)	49	59	16	6	35	12	24	41	17	7	14	22

Tabla 1. Fuente: MAPAMA y elaboración propia.

*Nota: Los datos correspondientes a 2016 son provisionales.

The data for 2017 indicates that the total number of incidents has increased by 11.57% compared to the average for the last decade, with an increase of 5.80 % in the number of outbreaks (area ≤1 ha) and 23.05 % in the number of fires (area > 1 ha) respectively. It was the year with the third highest number of incidents of the last decade.

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

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

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

On forests management level we can make next classification:

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

In Andalusia the law requires the preparation of Forest Fire Prevention Plans or Management Plans and the implementation of the prevention/defence measures established either in this document or in the Plans drawn up by the administration.

In Aragon the Forest management covers a total forest area of 2.5 million hectares, representing 53% of the area of the Autonomous Community of Aragon. There is high priority for forest fires. The forestry administration produces the statement of the High Risk Areas. The time of danger of forest fires is established for the year 2019 during the period from 1 April to 15 October.

In Catalunya, a large part of the fire prevention activity is concentrated in the priority protection periods (PPP). The risk sectors or PPPs are territorial areas with a large forest fire peril and which, due to the continuity of the forest mass, may start fires that are converted into a large forest fire (GIF), defined here as more than 500 ha. The main objective is to plan the necessary measures in a territorial area that constitutes a unit of action broad enough to allow planning with an integral vision, so that the strategic prevention infrastructures for the whole are identified. The PPI is used as a basis for direct investment decisions that the Directorate General of the Natural Environment makes in the prevention of fires on the territory.

In Castilla- la Mancha fire is an actual issue; the responsible organ is the Dirección General de Política y Espacios Naturales.

In the Valencian Community the planning of the actions is carried out by the Generalitat Valenciana through the approval of forest fire sectoral plans and the possibility for municipalities to draw up local fire plans, subject to the sectoral plans. Forest land owners and local entities in areas at high risk of forest fires shall be obliged to adopt appropriate measures to prevent forest fires and shall carry out, at their own cost, the corresponding work in the manner, within the time limits and under the conditions established in the fire prevention plans.

In Murcia, the forestry administration produces the statement of the High Risk Areas, as well as approving the defence plans. These plans shall establish the preventive work to be carried out, including the appropriate forestry treatments, firebreak areas, access roads and water points to be carried out by the owners of the forests in the area, the execution timeframes, and the methods for executing the work, depending on the legal status of the land, by means of treaties, agreements, temporary assignments of the land to the Administration, aid or grants or, where appropriate, subsidiary execution by the Administration.

It is important to bear in mind that the work carried out by Soliva and its suppliers, which normally involves forest treatments, thinning and clearing, has a positive impact on the prevention of forest fires, as it reduces the density and biomass in the forest cover.

In fact, in many areas of the Valencian Community where work is being carried out, the impact of the work on the occurrence of forest fires has been very positive as the number has decreased significantly. In general, these were forest areas that had undergone virtually no forest management in the last 30-40 years.

	<p>Soliva has implemented a Manual of good environmental practices, known to all its workers, which indicates the measures to be taken to prevent forest fires resulting from its work. Furthermore, based on the levels of risk determined by the public administration, at times of high-risk forestry work is not permitted in the area.</p> <p>Therefore, the following level of risk is defined as:</p> <ol style="list-style-type: none"> 1. Low for pest and disease management 2. high for forest fires, however, the work carried out and the implementation by Soliva of measures to prevent fires while the work is being carried out are standard operational procedures and are the mitigation measures for the risk.
Means of Verification	<p>Existing legal framework. Laws, regulations and control bodies</p> <p>Assessment of the potential impacts of forestry operations on the health and vitality of forests.</p> <p>Assessment of potential impacts at site level and of the measures taken to minimise them</p> <p>Good Environmental Practices in Sustainable Forest Management</p> <p>Contracts with suppliers</p> <p>Information received from suppliers</p> <p>Monitoring results and statistical data available</p> <p>Consultation with experts</p>
Evidence Reviewed	<p>Law 21/2015, of July 20, which modifies Law 43/2003, of November 21, of Forestry): https://www.boe.es/eli/es/l/2015/07/20/21</p> <p>Decree 3769/1972, of 23 December, approving the Regulation of Law 81/1968 of 5 December on Forest Fires. https://www.boe.es/eli/es/d/1972/12/23/3769</p> <p>FSC-NRA-ES V1-1 NATIONAL RISK ASSESSMENT FOR SPAIN: https://ic.fsc.org/en/document-center/id/309</p> <p>Forest fires:https://www.mapa.gob.es/es/desarrollo-rural/temas/politica-forestal/incendios-forestales/default.aspx</p> <p>Forest fire regulations: https://www.mapa.gob.es/es/desarrollo-rural/legislacion/leg-espanola-forestal-incendios.aspx</p> <p>Forest Fire Statistics: https://www.mapa.gob.es/es/desarrollo-rural/estadisticas/Incendios_default.aspx</p> <p>Forest fire data 2017: https://www.mapa.gob.es/es/desarrollo-rural/estadisticas/iiff_2017_def_tcm30-446071.pdf</p>

Andalusia:

Law 2/1992, of 15 June, Forestry law of Andalucía:

<https://www.juntadeandalucia.es/boja/1992/57/1>

Law 5/1999 on the Prevention and Combatting of Forest Fires in Andalucía:

<https://www.juntadeandalucia.es/boja/1999/82/1>

Aragon:

General information on forest fires:

http://www.aragon.es/DepartamentosOrganismosPublicos/Departamentos/DesarrolloRuralSostenibilidad/AreasTematicas/MA_MedioForestal/IncendiosForestales?channelSelected=302890292fb3a210VgnVCM100000450a15acRCRD

Legislation on forest fires:

http://www.aragon.es/DepartamentosOrganismosPublicos/Departamentos/DesarrolloRuralSostenibilidad/AreasTematicas/MA_MedioForestal/IncendiosForestales/ci.NORMATIVA_INCENDIOS.detalleDepartamento?channelSelected=302890292fb3a210VgnVCM100000450a15acRCRD

Catalunya:

<http://agricultura.gencat.cat/ca/ambits/medi-natural/>

Forest fire prevention: http://agricultura.gencat.cat/ca/ambits/medi-natural/gestio-forestal/dar_obres_forestals/dar_prevenccio_incendis/

Castilla-la Mancha

<http://www.castillalamancha.es/tema/medio-ambiente/>

Murcia:

<http://www.murcianatural.carm.es/web/guest/ambito-forestal>

Forest fire prevention: <http://www.murcianatural.carm.es/web/guest/visor-contenidos-dinamicos?artId=126706>

Valencia

Law 3/1993, of 9 December, of the Generalitat Valenciana, Forestry Law of the Valencian Community consolidated text:

http://www.dogv.gva.es/auto/dogv/docvpub/rlgv/1993/L_1993_03_ca_L_2017_21.pdf

Spanish Society of Forest Sciences: <http://secforestales.org>

Montero, G. and SERRADA, R. 2013. La situación de los Bosques y el sector en España - ISFE 2013 Sociedad Española de Ciencias Forestales. Lourizán (Pontevedra). <http://secforestales.org/content/informe-isfe>

	7th Spanish Forestry Congress. The situation of forests and the forestry sector in Spain. ISFE 2017: https://7cfe.congresoforestal.es/content/la-situacion-de-los-bosques-y-el-sector-forestal-en-espana-isfe-2017
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	Fire protection equipment are always present at the harvesting site in accordance with the legal requirements Harvesting work is performed at the time that is allowed and announced by the Department of fire prevention

	Indicator
2.4.3	The Biomass Producer has implemented appropriate control systems and procedures for verifying that there is adequate protection of the forest from unauthorised activities, such as illegal logging, mining and encroachment (CPETS7c).
Finding	<p>There are no significant problems in Spain with unauthorised or illegal activities in forests such as logging, mining or illegal occupation. Small scale problems are identified, such as unauthorised sports activities, theft of firewood, wood or fruit, poaching, etc.</p> <p>The Autonomous Communities have their own personnel to carrying out law enforcement. Within the Civil Guard there is also the SEPRONA unit (Nature Protection Service), which carries out the enforcement of environmental laws. The assessment of harvesting activities are well regulated in Spanish legislation.</p> <p>Illegal or unauthorised activities have a small impact on Spanish forests and there are no reports of situations of substantial magnitude with regards this issue.</p> <p>Corruption Perception Index score of 58 (2018).</p>
Means of Verification	<p>Records of field inspections and monitoring</p> <p>Interviews with workers</p> <p>Interviews with relevant parties</p> <p>Public information available (media)</p>
Evidence Reviewed	<p>Illegal Logging Portal, Spain: https://www.illegal-logging.info/regions/spain</p> <p>Transparency International. CPI Spain: https://www.transparency.org/country/ESP</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	
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	Indicator
2.5.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that legal, customary and traditional tenure and use rights of indigenous people and local communities related to the forest are identified, documented and respected (CPET S9).
Finding	<p>In MUP (Public Utility Forests) customary rights must appear in each forest record. For other cases (e.g. easements) could be regulated by the Civil Code, but both parties need to register these rights within the easement. The implementation of these rights is regulated at the regional (Autonomous Community) level via regional legislation. Communally-owned community forests with their specific laws, have their own courts according to each province.</p> <p>Conflicts related to customary rights can be addressed through the Ombudsman (Defensor del Pueblo). For the last several years there were no issues linked to forest use rights reported in the Ombudsmen's annual report.</p> <p>In many cases, customary rights have been integrated into modern management of forests (droving roads, public roads, firewood production, etc) and many others have fallen into disuse.</p> <p>There are no indigenous people in Spain that require special protection in terms of their forests use rights, and there are no local communities that depend on the services of the forests in order to survive. In the past, people were more dependent of the services that forest provide (firewood, charcoal production, hunting and fishing, etc). Nowadays urbanization is taking over and the rural population decreases. The customary rights remain unused by people and this is clearly illustrated by the shape of the forests. In most cases, forests are abandoned and require thinning and maintenance. This way forest services are useful to local communities.</p> <p>Soliva is performing thinnings and improving the forest structure. These operations do not affect any customary rights. Customary rights are considered in the Authorization for Harvesting on the stage of planning of harvesting operations and they are respected by the company.</p>
Means of Verification	Annual reports from Ombudsman

	Forest Management Plan or Authorization for Harvesting
Evidence Reviewed	<p>FSC-NRA-ES V1-1 NATIONAL RISK ASSESSMENT FOR SPAIN https://ic.fsc.org/en/document-center/id/309</p> <p>Ley de Montes 43/2003 https://www.boe.es/buscar/act.php?id=BOE-A-2003-21339</p> <p>Civil code: http://derechocivil-ugr.es/attachments/article/45/spanish-civil-code.pdf</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.5.2	The Biomass Producer has implemented appropriate control systems and procedures for verifying that production of feedstock does not endanger food, water supply or subsistence means of communities, where the use of this specific feedstock or water is essential for the fulfilment of basic needs.
Finding	<p>Regarding the basic needs of local communities, the dependence of some local communities on ecosystem goods and services has been identified, which could grant those goods and services the character of HCV, specifically dependence on unregulated water for human consumption and sanitary water. Despite this, it is widely accepted among the experts consulted in the development of FSC CW report (including a public workshop conducted by FSC Spain) that forest management activities do not threaten water availability under the conditions described, and that water policy and forest restoration and hydrological protection measures are sufficient safeguards.</p> <p>Regarding this indicator, only the protection of the headwaters of the hydrographic basins in the driest areas of southern and eastern Spain is considered applicable. These areas normally have protected reforested areas carried out by the state administration and are protected by both national and regional legislation. In addition, they are usually public forests managed by the administration itself (in fact, these forests are one of the types of forests that can be included in the catalogue of public utility forests).</p>

	In all cases, forestry operations in these forests require prior Authorization for Harvesting. Soliva does not perform any harvesting operations where authorization is not available.
Means of Verification	Technical Specifications for the public forest work contract Authorisation for Harvesting
Evidence Reviewed	Regulatory Framework for Hydrological Planning: https://www.miteco.gob.es/es/agua/legislacion/Marco_normativo_planificacion.aspx FSC-NRA-ES V1-1 NATIONAL RISK ASSESSMENT FOR SPAIN https://ic.fsc.org/en/document-center/id/309 Best forest management practices Strong legal framework
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.6.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that appropriate mechanisms are in place for resolving grievances and disputes, including those relating to tenure and use rights, to forest management practices and to work conditions.
Finding	<p>There is a well-established legal framework for land use and ownership rights, forest management activities and work conditions. These questions are regulated by:</p> <ul style="list-style-type: none"> • Civil code; • Forestry Law of the State and of the Autonomous Communities; • Workers' Statute (Estatuto de los trabajadores). <p>Grievances and disputes, including those relating to tenure and use rights, to forest management practices and to work conditions, can be reported to appropriate authorities regulating the issue in question. There are different channels established to address the relevant issues, for example: official appeals, hot lines, e-mails, personal visits of particular authorities.</p> <p>Besides that, Soliva is PEFC certified and implements a complaint procedure regarding its questions related to PEFC. The SBP compliant procedure involves all</p>

	complaint regarding forestry activities the company is performing. Soliva's personnel and its subcontractors are informed to transfer all grievances and complaints to SPB responsible.
Means of Verification	Complaint procedure; Complaint registration journal; Legal channels to address the issues to different regulatory authorities. Valid PEFC and SBP certificates
Evidence Reviewed	Civil code: http://derechocivil-ugr.es/attachments/article/45/spanish-civil-code.pdf Ilo Spain: https://www.ilo.org/dyn/eplex/termmain.showCountry?p_lang=en&p_country_id=18 Worker's statute: https://www.boe.es/buscar/act.php?id=BOE-A-2015-11430 Ley de Montes 43/2003: https://www.boe.es/buscar/act.php?id=BOE-A-2003-21339 Murcia Forest Service: http://www.murcianatural.carm.es/web/guest/ambito-forestal Valencia Forest Service: http://www.agroambient.gva.es/es/web/medio-natural Castilla-la Mancha Forest Service: http://www.castillalamancha.es/tema/medio-ambiente/ Andalusia Forest Service: http://www.juntadeandalucia.es/ Catalunya Forest Service: http://agricultura.gencat.cat/ca/ambits/medi-natural/ Aragon Forest Service: www.aragon.es/DepartamentosOrganismosPublicos/Departamentos/DesarrolloRuralSostenibilidad/AreasTematicas/
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.7.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that Freedom of Association and the effective recognition of the right to collective bargaining are respected.

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

	<p>ITUC Global Rights Index: Rankings of the world's worst countries for workers: https://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng.pdf</p> <p>Spanish Constitution: https://www.boe.es/eli/es/c/1978/12/27/(1)</p> <p>Workers' Statute: https://www.boe.es/eli/es/rdlg/2015/10/23/2</p> <p>Last amended by Royal Legislative Decree 2/2015 of 23 October: https://www.boe.es/eli/es/lo/2015/03/30/2</p> <p>Ministry of labour, migration & social security: http://www.mitramiss.gob.es/en/index.htm</p> <p>All legislation related to Employment and Social Security: https://www.boe.es/legislacion/codigos/codigo.php?id=93&modo=1&nota=0&tab=2 http://www.congreso.es/consti/constitucion/indice/sinopsis/sinopsis.jsp?art=37&ti po=2</p> <p>Spanish Ministry of Employment and Social Security, 2018 Guide to Collective Bargaining: http://www.empleo.gob.es/es/sec_trabajo/ccncc/B_Actuaciones/Guia/GuiaNC_2018_web.pdf</p> <p>Spanish Ministry of Employment and Social Security, Strategic Plan for the Labour Inspectorate and Social Security: https://www.boe.es/boe/dias/2018/04/19/pdfs/BOE-A-2018-5329.pdf</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.7.2	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not supplied using any form of compulsory labour.
Finding	<p>See also indicator 2.7.1.</p> <p>Spain was actually one of the first countries to ratify the 1930 Convention on Forced Labour (No. 29), doing so in 1932. It has developed a solid legal and institutional framework to fight human rights violations and illegal employment,</p>

	<p>especially with the constant adaptation of the relevant repressive provisions of the Criminal Code, through the adoption in 2009 of an initial Integral Plan against human trafficking, and with the specific role played by the labour inspectorate in detecting criminal conditions arising from exploitation at work or human trafficking.</p> <p>Labour exploitation is prohibited by the Penal Code, as well as by immigration law. Under article 311 of the Penal Code, those who impose on workers (by deception or exploitation of vulnerability) such services and working conditions that prejudice social security are punishable by imprisonment from six months to six years and a fine of six to twelve months' salary. Article 312 prohibits the smuggling of labour and the hiring of undocumented workers in working conditions below permitted standards.</p> <p>Under article 173 of the Criminal Code, a person who, through the use of his superior position in an employment relationship, inflicts degrading treatment on another by seriously undermining his moral integrity is liable to imprisonment.</p> <p>There is no provision in Spanish law that limits workers to change or leave work. Workers must give prior notice as specified in the collective agreement or as custom requires. The usual period of notice is 15 days.</p> <p>Workers normal working hours are 9 a day and 40 a week on average over a twelve-month reference period. The maximum number of overtime hours per year is 80.</p> <p>No relevant violations have been found of the laws on forced labour in relation to the forestry sector. The risk relating to the indicator is classified as low.</p>
Means of Verification	See also indicator 2.7.1.
Evidence Reviewed	<p>See also indicator 2.7.1.</p> <p>Additional forced Labour Regulations:</p> <p>Organic Law 10/1995, of 23 November, on the Penal Code/ Penal Code: https://www.boe.es/eli/es/lo/1995/11/23/10</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
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2.7.3	The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is not supplied using child labour.
Finding	<p>See also indicator 2.7.1 and 2.7.2.</p> <p>Article 6 “Child Labour” of the Workers’ Statute specifies:</p> <ul style="list-style-type: none"> • People aged under 16 shall not enter the world of work. • Workers aged under 18 cannot carry out night duties. They must also not carry out any work activities or fill any work posts that are covered by limitations on contracting persons aged under 18, pursuant to the provisions of Law 31 / 1995 of 8 November on Preventing Risks in the Workplace, and in applicable regulations. • People aged under 18 shall not do overtime. • People aged under 18 shall only take part in public shows in exceptional cases subject to the labour authority, provided that doing so is not injurious to the health, professional development, and human development of those persons. Permission must be given in writing and for specific events.” <p>No relevant violations are found of the laws on child labour in relation to the forestry sector. The risk relating to the indicator is classified as low.</p>
Means of Verification	See also indicator 2.7.1
Evidence Reviewed	See also indicator 2.7.1 and 2.7.2
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.7.4	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not supplied using labour which is discriminated against in respect of employment and occupation.
Finding	<p>See also indicator 2.7.1 and 2.7.2.</p> <p>Spain is referred positively in international reports:</p>

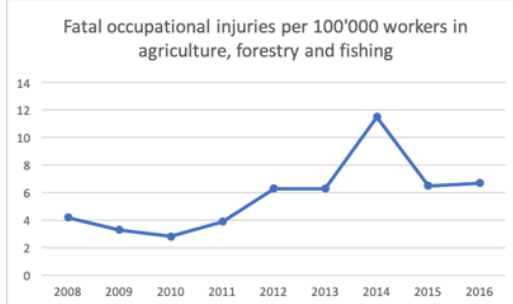
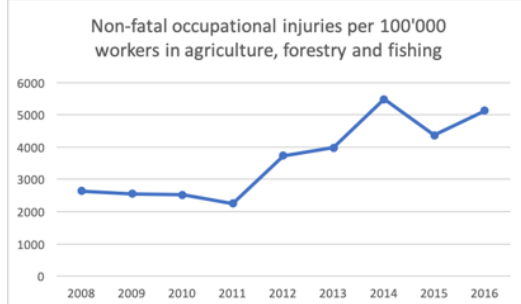
	<p>Corruption Perception Index score of 58 (2018). It is clearly above 50, which means that the population has trust in governmental documents and control.</p> <p>The World Governance Indicators (WGIs) of the World Bank, with 2017 values of between 61.90 and 83.17 (1 – 100 points). The World Bank's WGI report has been prepared in 200 countries since 1996 and covers the following governance indicators: 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> <p>According to information from Eurostat, Spain has a gender gap of 14.9% (the average gender salary gap in the EU is 16.3%). The gap continues to diminish in 2002, it was 19%. In turn, just 6% of the people working in it are women.</p> <p>No relevant violations are found of discrimination in relation to the forestry sector. The risk relating to the indicator is classified as low.</p>
Means of Verification	See also indicator 2.7.1.
Evidence Reviewed	<p>See also indicator 2.7.1 and 2.7.2.</p> <p>Eurostat, the salary gap in Spain: ec.europa.eu/newsroom/just/document.cfm?doc_id=48113 https://elpais.com/elpais/2018/03/06/media/1520349163_919876.html https://politica.elpais.com/politica/2018/03/02/actualidad/1519999246_882483.html</p> <p>Gender equality policies in Spain – IPOL STU(2016)583112: http://www.europarl.europa.eu</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

Indicator

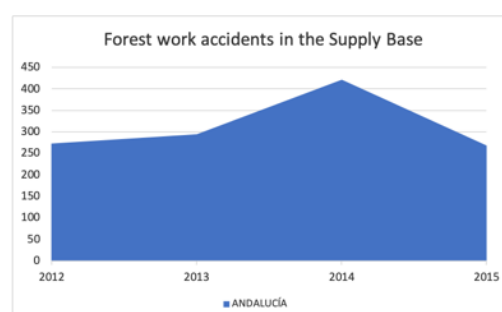
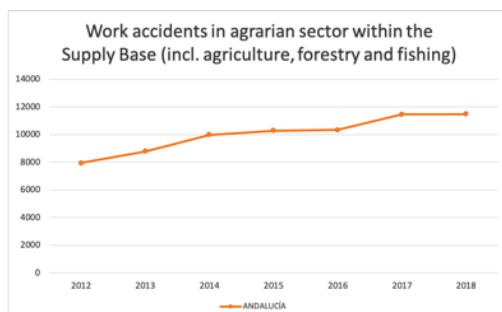
2.7.5	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is supplied using labour where the pay and employment conditions are fair and meet, or exceed, minimum requirements.
Finding	<p>See also indicator 2.7.1 and 2.7.2. and 2.7.4.</p> <p>In Spain, the government holds consultations with the most representative trade union organisations and business associations before setting the <i>Salario Mínimo Interprofesional</i> (Minimum Wage) for permanent, casual, and temporary workers alike, as well as for domestic employees, taking account of the Consumer Price Index, the average national productivity achieved, the increase in the share of work in national income, and the general economic situation. The value set for 2018 is 735.90 euros per month. Collective bargaining agreements usually exist, with remuneration and conditions for the sector's workers.</p> <p>In the same way if taxes are not paid by its suppliers, Hacienda notifies Soliva as a counteragent of the debtor, as does Social Security. These are the two most powerful agencies in the state about these issues. Soliva has also received seizure letters from the Social Security in which a debt is recognized and they notify Soliva the size of the debt and that Soliva needs to pay this to the Social Security before paying the supplier. Once they have settled the debt, the authorities notify Soliva once more that all debts are paid.</p> <p>If the debt is not paid, the state automatically interrupts the activity of that company, leading to prison sentences as well as high fines.</p> <p>No relevant violations are found of workers being exploited in relation to the forestry sector. The risk relating to the indicator is classified as low.</p>
Means of Verification	<p>See also indicator 2.7.1.</p> <p>Forms TC1 and TC2.</p>
Evidence Reviewed	See also indicator 2.7.1, 2.7.2 and 2.7.3.
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
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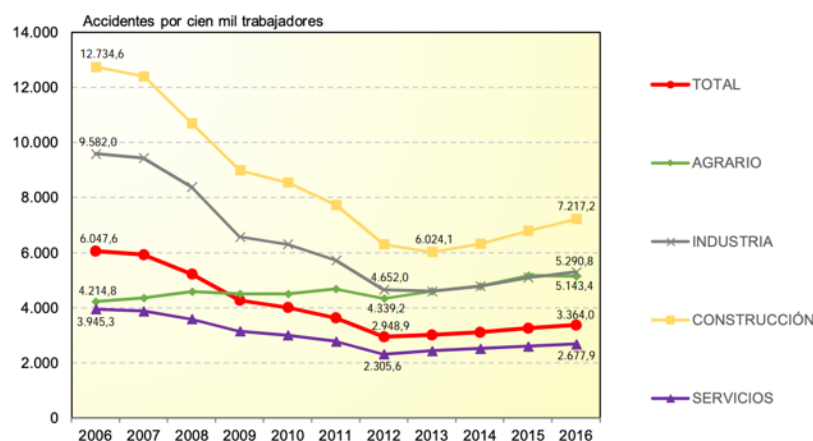
2.8.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12).
Finding	<p>The following laws regulate the issue of security and health in the forest sector:</p> <p><u>Law on Prevention of Occupational Risks and Regulation of Prevention Services</u></p> <p>As for any labour activity, Law 31/1995 of November 8, modified by Law 54/2003, is applicable, which legally regulates the basic framework for the protection of the safety and health of workers against the risks arising from work. On the other hand, it is also necessary to indicate the application to forestry work of the Regulation of Prevention Services (Royal Decree 39/1997, of January 17), and the modifications introduced to it by Royal Decree 780/1998, of 30 April, and by Royal Decree 604/2006, of May 19.</p> <p><u>Regulations for the development of the Law on the Prevention of Occupational Risks</u></p> <p>The regulations that emanate from the aforementioned Law 31/1995 and from Law 54/2003 that modify it, developed by various regulatory standards, in accordance with article 6 of said law, are applicable to forestry operations, although one must highlight a very important exclusion such as Royal Decree 486/1997, of 14 April, which establishes the minimum health and safety provisions in workplaces, since the fields of cultivation, forests and other lands that are part of a company or centre of agricultural or forestry work, but that are located outside the built zone of the same.</p> <p>R.D. 1215/1997, of 18 July, on minimum safety and health provisions for the use by workers of work equipment, in terms of the use by workers of equipment such as tractors, processors, etc.</p> <p>Royal Decree 773/1997, of May 30, on minimum health and safety regulations regarding the use by workers of personal protective equipment.</p> <p>The concept of occupational accidents refers to the production of work accidents and occupational diseases linked to the exercise of a professional activity. The forestry sector is, after the construction sector, the one with the highest rate of occupational accidents and occupational diseases.</p> <p>A more detailed analysis of the main sources of accidents in forestry work reveals that the forestry exploitation phase and, more specifically, the felling, felling and cutting with chainsaws are the forestry activities with the highest accident rate.</p> <p>The use of the chainsaw, which is a widespread tool in rural areas, causes 18% of accidents.</p> <p>According to International Labour Organization, there have been an increase in fatal and non-fatal injuries related to agriculture, forestry and fishing sector in Spain.</p>



The same situation is reflected within the supply base, in absolute figures. However, over the past years forest sector showed a growth and increase of employment rate.



Below, the comparison of the index of the total sectors, followed by the industrial sector, with 5,290.8 and the agricultural sector with 5,143.4 accidents per one hundred thousand workers.



All companies have the obligation to have a contracted with a mutual insurance company which is entrusted to:

- Annual medical review of all workers
- Annual training for all workers on occupational health and safety, specific training for each workplace
- In case of accident, evaluation of the same and corrective measures to avoid a repetition

	<ul style="list-style-type: none"> Issue a certificate to be aware of compliance with all legislation related to occupational health and safety. <p>In addition, random government technicians make on-site inspections to verify that all workers wear the PPE and all regulations are complied with. Forest Police is checking ongoing harvesting operations without preliminary notice. Soliva maintains the status of the safest forestry company with a minimum rate of accidents of which almost all are related with the movements through the forest and receiving the light injuries. On the level of the state, due to the analysed information, more control seems to be necessary in this field. Without implementation of wide set of mitigation measures by Soliva, the risk would be considered high. However, the implemented measures by Soliva are sufficient to mitigate the risk.</p>
Means of Verification	<p>Record of internal and external training carried out for forest workers and sources taken on the risk and safety</p> <p>Record of delivery of PPE to all workers</p> <p>Records of field inspections</p> <p>Work place assessment results carried out by external company</p> <p>Field work assessment results carried out by own managers (check list)</p> <p>Interviews with staff</p>
Evidence Reviewed	<p>Existing legal framework and level of governance;</p> <p>Law 31/1995 on Preventing Occupational Risks and Regulation of Prevention Services: https://www.boe.es/buscar/doc.php?id=BOE-A-1995-24292</p> <p>Law 54/2003, of December 12, on the reform of the regulatory framework for the prevention of occupational hazards: https://www.boe.es/buscar/doc.php?id=BOE-A-2003-22861</p> <p>Royal Decree 39/1997, of January 17, which approves the Regulation of Prevention Services: https://www.boe.es/buscar/doc.php?id=BOE-A-1997-1853</p> <p>Spanish Ministry of Employment, Migration and Social Security, Strategic Plan for the Labour Inspectorate and Social Security: http://www.mitramiss.gob.es</p> <p>Ministry of Employment, Migration and Social Security, Statistics of work accidents: http://www.mitramiss.gob.es/estadisticas/eat/welcome.htm</p> <p>Occupational accidents in the sector:</p>

	http://forestales.ibv.org/index.php?option=com_content&view=article&id=10&Itemid=137 Decrease of accidents in the Forestry Sector: https://www.ademan.org/siniestro/ Prevention of risks in forestry activities http://www.insht.es/SectorAgrario/Contenidos/ficheros/PRL%20en%20actividad%20forestal.pdf
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>Soliva implements the following mitigation measures to reduce this risk:</p> <ul style="list-style-type: none"> • Obliges suppliers and subcontractors to provide all necessary legal documentation (certificate of accident insurance, training records on health and safety risks, record of delivery of PPE to all workers, a positive health certificate for each worker issued by a doctor) • Refuses to buy wood from suppliers that are not able to provide all necessary documentation related to health and safety requirements from its suppliers and subcontractors; • Provides training to its own forest harvesting teams (obligatory) and offers it to external teams; • Provides a copy of best forest management practices, including explanations on health and safety, to the forest workers; • Supervises own harvesting operations and the operations of suppliers (80% random checks) on the fulfilment of the health and safety requirements. All required PPE must be used, and other protection equipment must be available onsite. A check list on different health and safety issues has been developed. <p>If the health and safety requirements are not fulfilled in full during a harvesting operation, the SBP-compliant claim is rejected for the feedstock coming from such operations.</p>

	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	<p>Spain has chosen to account activities of land use, land use change and forestry by the end of the commitment period to Kyoto protocol. The Spanish Inventory System is established in Law 34/2007 on air quality and protection of the atmosphere and its operation is developed in Royal Decree 818/2018, which assigns the General Directorate of Biodiversity and Environmental Quality of the Ministry for Transition Ecological the role of competent authority of the Spanish System of Inventory and Projections of Emissions to the Atmosphere (SEI).</p> <p>The carbon stored in terrestrial ecosystems is distributed in three compartments, biomass of</p>

living plants (stem, branches, foliage and roots), plant detritus (branches and cones, forest litter, tree stumps, toppings and logs) and soil (organic mineral humus, surface and deep mineral soil). However, carbon stock is not even throughout the country. Mediterranean forest is drier than the Northern one and store less carbon. Mean concentration of carbon is 8.7 kg/m², ranging from 2.3 kg/m² in dry Mediterranean areas to 20.4 kg/m² in wetter northern locations with mountainous areas and high precipitation rates. The total organic carbon stock in soils of Andalusia is 415 Tg for the upper 75 cm, with average values ranging from 15.9 Mg C ha⁻¹ (Solonchaks under "arable land") to 107.6 Mg C ha⁻¹ (Fluvisols from "wetlands").

Forests which occupy almost 29% of the country's total land area are increasing by about 86 000 ha per year, both through natural expansion and through the forest plantation programme that has been under way for more than 50 years, with soil protection and erosion prevention as its main aims. This affected carbon stock in a very positive way as well, though this trend is stabilizing now.

Table 4 Historical data on removals in managed forest lands and Harvested wood products (HWP) collected by the National inventory (data in kt CO₂ eq.)

	Managed forest lands	HWP		Managed forest lands	HWP
1990	-19.774	-2.037	2010	-26.907	-396
1995	-20.764	-2.230	2011	-26.839	-267
2000	-24.974	-3.387	2012	-26.594	-49
2005	-26.279	-3.289	2013	-27.074	-67
2007	-26.767	-2.792	2014	-27.237	-1.177
2008	-26.853	-2.242	2015	-27.260	-2.348
2009	-26.704	-409	2016	-27.512	-1.942

Carbon sequestration according to last available data is higher in 2016 than in 2008.

According to global forestry watch, in Spain, the land-use change, and forestry sector is a net sink of CO₂, sequestering an average of 43.5 tCO₂eq./year from 1990 to 2014. This represents an offset of 14% of Spain's total greenhouse gas emissions over the same period.

Soliva performs only maintenance operations approved by the state authorities which regulates the questions of carbon sequestration in the forest. Most of the forests within the supply base are in high need of maintenance operations. The operations that are being carried out focus on forest stand improvement. In no case clear cuts are made. The regional administrations prefer to create uneven-aged forest stands, which are ideal to manage through continuous selective cutting. Clear cuts would have an excessive impact on carbon stocks.

Means of Verification

Information available: maps, web sites, statistics
Results of analysis of carbon storage

	Interviews with experts
Evidence Reviewed	<p>Existing legal framework</p> <p>National forest inventory plan of Spain for 2021-2025 https://www.miteco.gob.es/es/cambio-climatico/temas/mitigacion-politicas-y-medidas/nfap_es_tcm30-485874.pdf</p> <p>Global forestry watch: https://www.globalforestwatch.org/dashboards/country/ESP?category=climate</p> <p>Data of reforestation in Spain: https://www.iberianature.com/geography/forests-in-spain/</p> <p>Study “Assessment of the soil organic carbon stock in Spain”: https://www.sciencedirect.com/science/article/pii/S001670611530104X</p> <p>Ministry of ecological transition https://www.miteco.gob.es/es/cambio-climatico/temas/mecanismos-de-flexibilidad-y-sumideros/sumideros-de-carbono/</p> <p>Spanish system of emissions inventory https://www.miteco.gob.es/es/calidad-y-evaluacion-ambiental/temas/sistema-espanol-de-inventario-sei/</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk RA <input type="checkbox"/> Unspecified Risk at
Comment or Mitigation Measure	

	Indicator
2.9.2	Analysis demonstrates that feedstock harvesting does not diminish the capability of the forest to act as an effective sink or store of carbon over the long term.
Finding	<p>Information on actions in the sector of land use, land use change and forestry in Spain provides the data, that there is much less carbon absorbed by agricultural land than forests. Pastures, Wetlands, Settlements, Other lands, Disturbances in crop lands cover, Limestone amendments, Forest fires and prescribed burning emitting certain amount of carbon.</p> <p>Study “Soil carbon stocks and their variability across the forests, shrublands and grasslands of peninsular Spain” has found that, however, there is no statistically significant differences between forestlands and grasslands. The lowest carbon levels are associated with agricultural soils. Certain changes in agricultural</p>

	<p>practises (conservation tillage) or converting some unproductive croplands into grasslands or forestlands can increase carbon sequestration in soils.</p> <p>Spain established at the national level measures aimed at securing carbon stocks and the reduction of emissions. In the framework of forestry, these measure entail:</p> <ul style="list-style-type: none"> • Promoting Sustainable Forest Management; • Restoring and expanding a forest cover. <p>These measures are established at the national level and are monitored and controlled by the competent authorities.</p> <p>In forests, silviculture practices also affect the level of carbon stock. Río et al. (2008a), using a growth model to compare different thinning regimes (simulations), found that in the case of Mediterranean maritime pine (<i>Pinus pinaster</i>) in central Spain (rotation period of 80 years), the best carbon sequestration strategy was to adopt an early (20 years), heavy thinning regime. Garcia-Gonzalo et al. (2007), using a modelling approach, found that an increase in the thinning intensity also led to an increase in the total carbon stock, the pattern being similar for the different species considered. Thinning regimes and product lifespan should be taken into account in order to determine the most suitable forest management for carbon sequestration.</p> <p>Soliva performs only thinnings (forest maintenance and selective harvesting operations) approved by the state authorities which regulates the questions of carbon sequestration in the forest. Besides that, thinnings are done when no land use change is planned. The land use (forest) remains the same.</p>
Means of Verification	<p>Information available: maps, web sites, statistics</p> <p>Results of analysis of carbon storage</p> <p>Interviews with experts</p> <p>Forest practices executed by Soliva</p>
Evidence Reviewed	<p>Existing legal framework</p> <p>Forest management and carbon sequestration in the Mediterranean region: http://revistas.inia.es/index.php/fs/article/view/11205/3639</p> <p>Information on actions in the sector of land use, land use change and forestry in Spain: https://www.miteco.gob.es/images/es/acciones_lulucf_espana_def_tcm30-178767.pdf</p> <p>Study “Soil carbon stocks and their variability across the forests, shrublands and grasslands of peninsular Spain”: https://core.ac.uk/download/pdf/132083936.pdf</p>
Risk Rating	<p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>

Comment or Mitigation Measure	
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	Indicator
2.10.1	Genetically modified trees are not used.
Finding	<p>The activities with genetically modified organisms (GMOs) are regulated in Spain by Royal Decree 178/2004, of 30 January, approving the General Regulation for the Development and Execution of the Law 9/2003 (25 April), which establishes the legal regime of confined use, voluntary release and commercialization of genetically modified organisms.</p> <p>There is no total prohibition on the commercial use of GMO, but it is strictly regulated, and licensing is required for this activity. However, currently, licenses have only been granted for the marketing of agricultural products (maize).</p> <p>No forest species are included in the Ministry of Agriculture, Fisheries and Food's database of commercial varieties with GMO. For trial purposes, authorizations were granted in 2012 for a test with poplar (<i>Populus spp.</i>). These trials continued until 2015 and currently there are no ongoing tests.</p> <p>Forestal Soliva and its suppliers does not operate in forests with genetically modified trees, and such wood is not utilized. Used are only four common, native pine species.</p>
Means of Verification	<p>List of species that could be approved for GMO use: https://www.mapa.gob.es/es/agricultura/temas/medios-de-produccion/semillas-y-plantas-de-vivero/registro-de-variedades/reg-de-variedades-comerciales</p> <p>Obtained wood from pine tree species, Soliva and its suppliers processes:</p> <ul style="list-style-type: none"> • Aleppo pine (<i>Pinus halapensis</i>); • Umbrella pine (<i>Pinus pinea</i>); • Maritime pine (<i>Pinus pinaster</i>); • Black pine (<i>Pinus nigra</i>); • Scots pine (<i>Pinus sylvestris</i>) • Radiata pine (<i>Pinus radiata</i>) • Mountain pine (<i>Pinus uncinata</i>)
Evidence Reviewed	The existence of a strong legal framework in the region

	<p>Law 9/2003, of April 25, which establishes the legal regime of confined use, voluntary release and commercialization of genetically modified organisms. https://www.boe.es/buscar/doc.php?id=BOE-A-2003-8588</p> <p>Resolutions of GMO use by Autonomous Communities: https://www.miteco.gob.es/es/calidad-y-evaluacion-ambiental/temas/biotecnologia/organismos-modificados-geneticamente-omg-/registro-publico-OMG/CCAA.aspx</p> <p>List of species that could be approved for GMO use: https://www.mapa.gob.es/es/agricultura/temas/medios-de-produccion/semillas-y-plantas-de-vivero/registro-de-variedades/reg-de-variedades-comerciales</p> <p>Genetically modified poplar authorization: https://www.miteco.gob.es/es/calidad-y-evaluacion-ambiental/temas/biotecnologia/SNIF_B_ES_12_30_tcm30-185784.pdf</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	