

Revised Final Draft Regional Risk Assessment for Portugal

This document has been prepared at the request of ANPEB – Portuguese Pellet Association – which provided financial support for developing the National Risk Assessment in accordance with SBP RRA Procedure v1.0. The risk assessment work was facilitated by a working group of members of the Portuguese Standardisation Institute (IPQ) Technical Committee (CT) 145.

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Contents

1	Introduction	6
2	Scope and Regional Background	8
3	Methodology	11
3.1	Stakeholders' consultation	12
3.2	Stakeholders' consultation coordinated by the Working Group of CT145.....	12
3.3	Stakeholders' consultation coordinated by SBP central office	15
3.4	SBP Workshop in Portugal June 29 th 2018	16
3.5	Revision Version 8.3 – November 5 th 2018.....	16
3.6	Final consultation period	17
4	Interpretation guide for Portugal	21
5	Conclusions.....	24
	Annex 1: Detailed Findings for Supply Base Evaluation Indicators.....	27
	Annex 2: Stakeholders' comments.....	111
	Annex 3: List of identified key stakeholders	121

Abbreviations

ACT – Portuguese Work Conditions Authority

ASAE - National Authority for Food and Economic Safety

CBD – Convention on Biological Diversity

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

CT 145 – Technical Committee 145 (Sustainable Forest Management)

DGT – Directorate-General of Territory

DDS – Due Diligence System

EUTR – European Union Timber Regulation

FAO – Food and Agriculture Organisation

FSC – Forest Stewardship Council

FSC NRA – FSC National Risk Assessment

GNR – National Republican Guard

HCV – High Conservation Values

ICNF – Portuguese Institute for Nature Conservation and Forests

IFN – Portuguese Forest Inventory

ILO – International Labour Organisation

IMI – Real Estate Municipal Tax

INE – National Statistics Institute

IPQ – Portuguese Institute for Standardisation

IRC – Taxes on Corporate Income

IRN – Portuguese Institute of Registries and Notary

IRS – Taxes on Personal Income

IVA – Portuguese Value Added Tax (VAT)

NGO – Non-Governmental Organisation

NMP – Pinewood Wilt Disease

NTFP - non-timber forest products

PDM – Municipality Master Plan

PEFC - Programme for the Endorsement of Forest Certification

PGF – Forest Management Plan

PGBH - Hydrographic Basin Management Plans

PGRH – Hydrographic Region Management Plan

PROF – Regional Forest Plan

RJAAR – Legal Regime for afforestation and reforestation activities

SEPNA - Department of National Republican Guard responsible for environment surveillance

ZIF – Forest Intervention Zones

1 Introduction

The present document is the Draft of the National Risk Assessment prepared within the scope of the Sustainable Biomass Program scheme to be submitted to SBP technical board for approval and subsequent consultation of stakeholders to be coordinated by the Working Group SBP National Risk Assessment presented below.

This SBP risk assessment draft has been prepared on the request of ANPEB – Portuguese Pellet Association – which provided financial support for developing the National Risk Assessment in accordance with SBP RRA Procedure v1.0. The risk assessment work was facilitated by a working group of members of the Portuguese Standardization Institute (IPQ) Technical Committee (CT) 145. The CT 145 is a technical body that aims at the preparation of normative documents and opinions in the field of forest management, where individual or collective stakeholders with an interest in the matters concerned participate in a voluntary regime, giving, as far as possible, a balanced representation of the socio-economic and environmental interests in the scope.

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

The members of technical committee 145 involved in the process are found here:

[CT 145 webpage](#) The working group “SBP National Risk Assessment” was created in the plenary assembly number 92 of the Technical Committee 145 that took place on May 31st 2017. The entities taking part in the WG “SBP National Risk Assessment” are:

PEFC Portugal (Marina Soares e Paula Salazar)

ANEFA (Vera Santos)

Navigator Company (Paula Guimarães and Inês Viegas)

Altri Florestal (Pedro Serafim)

Susana Brígido (2bforest)

INIAV (Alberto Gomes)

Centro Pinus (Susana Carneiro)

ICNF (Helena Ceia and Dina Anastácio)

ANPEB (João Ferreira)

The coordination of the working group was performed by ANPEB which was responsible for the wording of the text.

The WG took into account, when applicable, the work performed by the Technical Committee 145 “Working Group for FSC Controlled Wood National Assessment” that led to the submission of the Draft National Risk Assessment document proposal for appreciation of FSC International. The FSC Forest Management Standard for Portugal was also used when necessary.

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

The public consultation was carried out from September 5th to October 5th 2017 and included close to 200 entities, comprising national authorities, research institutes, universities, forest owners' associations, certification bodies, environmental NGO's, forest-based industries, among others.

2 Scope and Regional Background

The scope of this assessment covers the Portugal Mainland which includes the Primary wood feedstock supplies from Portugal.

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

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

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

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

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

- Trás-os-Montes, Douro e Minho regions show an average property size of 1.9ha/owner, where 63% of properties are under 10ha.
- Beira Interior and Beira Litoral, in the central region of the Portuguese mainland show an average property size of 1.46ha/owner and properties under 10ha represent 62% of the forest area.
- Ribatejo and West – 7.53ha/owner average and 55.6% of the forest properties above 100ha.
- Alentejo – 22.6ha/owner average and 68.8% of the forest properties above 100ha.
- Algarve – 2.83ha/owner and 59% of properties under 10ha

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

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

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



Figure 1 Map of Portugal Mainland

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

Forest Management Plans (PGF) are mandatory for forest areas above a minimum area defined for each region by the relevant Regional Forest Plans (PROF) – as well as in Forest Intervention Areas (ZIF, 940'432 ha). In 2016, there were 1 680 000 ha under PGF from which 450 034 ha have an overlap with the National Classified Areas Network.

Felling licences are mandatory for the following cases:

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

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

ICNF also manages public forest areas, being also involved in the management of community areas.

In addition, the Environmental Service of the National Republican Guard (SEPNA/ GNR) is engaged in the inspection of environmental issues and natural resources in all private and public areas.

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

3 Methodology

The proposed draft SBP risk assessment includes all relevant criteria and indicators of SBP Standard 1: Feedstock Compliance Standard. The project team included ANPEB and the Working Group SBP NRA as well as the members of Technical Committee 145 (CT145). Several individuals on the project team participated in the development of the FSC Controlled Wood NRA Draft, available at the FSC webpage, and their experience was important for the development of this document.

It is also important to highlight that Technical Committee 145 comprises a high level of representation from the major relevant stakeholders with 59 registered members, the sectorial distribution is presented in table 1 below. All members were regularly updated on the developments of the work performed by the Working Group.

Table 1 Stakeholders groups within CT145

Industry and trade	Small and Medium Companies	Administration	Work authorities and unions	Universities and technology centres	Certification Bodies	Environmental NGO
35,59%	10,17%	11,86%	1,69%	11,86%	25,42%	3,39%

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

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

1. The working group SBP NRA was officially constituted in the CT 145 general assembly on May 31st 2017. The kick-start meeting for the project of the working group was held using web conference on June 9th 2017. A web conference was preferred to ensure that stakeholders with limited resources were able to attend. Susana Brígido, Alberto Gomes and Helena Ceia couldn't join the meeting. ANPEB, as coordinator, presented to the Working Group a first draft of the SBP NRA (V1.0), consisting of findings previously collected. This provided a starting basis for the development of the work. The members of the working group agreed to review and comment on the SBP NRA V1.0 for a period of 4 weeks and schedule a face-to-face meeting for the beginning of July 2017 in order to discuss amendments and changes as well as risk evaluations for the relevant indicators.
2. The first face-to-face meeting of the working group SBP NRA was scheduled for July 13th 2017. The meeting was open for members of CT 145 outside the working group, as well as other relevant stakeholders identified by ICNF. A new version of the SBP NRA draft (V2.0), comprising amendments suggested by the working group, was sent to all the invited stakeholders on June 30th 2017. During this meeting, several changes were proposed by the participants and accepted by the working group. Another face-to-face meeting was scheduled for July 28th 2017, with the objective of presenting a new version of the SBP NRA draft, considering the changes accepted by the working group.
3. A revised version of the draft SBP NRA (V4.0) from July 25th 2017 was sent attached to the formal invitation for the scheduled second face-to-face meeting to be held on July 28th 2017. The importance of the participation of all CT145 members was reinforced in the invitation for this meeting. At the same time, considering the importance of the environmental NGO participation within this project, the invitation was renewed and reinforced to Quercus, Associação Zero, WWF and Liga para a Protecção da Natureza 3 days before the meeting, even though these entities were included in the process since the beginning as members of CT 145, hence, receiving all invitations to plenary and working group meetings, respective minutes and other relevant information. Unfortunately, none of the organizations were represented. The outcomes of the second face-to-face meeting gave origin to version 5.2. of the SBP NRA draft. It is noted that the meeting invitation was sent only 3 days prior to the

meeting, which may have resulted in lower attendance. Despite that, the meeting had a pretty reasonable attendance of around 20 stakeholders.

4. The SBP NRA draft V5.2 was put to the vote of all CT 145 members through an email sent on August 16th 2017 by the CT145 secretariat. A 10 working day voting period was given to all members. The SBP NRA Draft V5.2 was accepted with one abstention. August is, typically, holiday season in Portugal which might have led to the poor adherence to this voting process.
5. SBP NRA Draft V5.2 was submitted to SBP technical office on August 14th 2017.
6. Comments were received from an external consultant of SBP on August 24th 2017. Amendments were performed taking into account the comments received and the version 6.0 of the draft SBP NRA was sent to SBP on August 30th 2017 being approved to be released for public consultation on September 5th 2017.

The stakeholders' consultation process lasted 30 days and started on September 5th 2017. A brief description of the process is presented in chapter 5. The stakeholders' consultation process has been lengthy in this instance, to ensure that all stakeholders have an equal opportunity of input to the process. The activities which took place between September 2017 and April 2019 are described in the next section.

3.1 Stakeholders' consultation

There were two rounds of stakeholders' consultation, one being coordinated by the Working Group of the CT145 and the other coordinated by SBP central office. The comments and proposals of each round will be presented separately below.

3.2 Stakeholders' consultation coordinated by the Working Group of CT145

The stakeholders' consultation was carried out from September 5th 2017 to October 5th 2017. During the process, SBP received and verified the list of stakeholders, comprising around 200 entities. The identified stakeholders are distributed by 6 main groups as shown in table 2. The full list of stakeholders can be consulted in Annex 3 of this document. The stakeholders that attended the Working Group meetings within CT145 framework are also identified in Annex 3. The written comments received within the public consultation framework can be consulted in Annex 2 of this document.

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

State forest services or equivalent	Forest and environmental NGO	Forest-based industries and association	Universities and technology centres	Certification Bodies and working groups developing standards	Energy Agencies
15.79%	8.42%	36.84%	22.11%	5.26%	4.21%

The stakeholders were contacted by email sent directly from CT 145 secretariat on September 5th 2017.

The stakeholders' consultation was promoted on the ANPEB website (see [here](#)) and CT145 page on ICNF website (see [here](#)). ANPEB also promoted the consultation using the association's Facebook page ([here](#)) and twitter ([here](#)).

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

Due to the considerable number of revisions done by the working group, considering comments from CT145 members that attended the meetings, as well as SBP external consultants (see Annex 2), sent before the stakeholders' consultation period, version 6 of the draft RRA that went for public

consultation had been significantly scrutinized by several key actors. For this reason, a reduced number of comments coming from the public consultation was expected.

Stakeholders' comments on the rationale that supports the risk evaluation proposed for the indicators is presented below and is included in the draft RRA for Portugal version 7.2 from December 7th 2017 submitted to SBP general office.

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

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

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

Portugal has an incomplete geometric cadastre of the rural real estate that only covers 53% of the country, which was addressed in version 5.2 of the RRA. Stakeholders raised attention to the risk verified in areas where the geometric cadastre is not developed. The impact of the identified risk was considered, by the understanding of the working group, as residual. It was considered that the number of lawsuits related to the illegal use of forest property by entities without legal ownership over that land is negligible. Nevertheless, taking a precautionary approach and considering that the government is taking measures in order to simplify and streamline the process to register the other 47% of the rural real estate, it was decided to raise the risk level to specified for the above-mentioned areas.

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

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

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

Stakeholders requested clearer justification for the specified risk assessment regarding the identification, mapping and addressing of threats on HCV1 and HCV 3, considering that the wording in the document didn't follow the risk classification. The working group considered that, the scope of SNAC and RNAP, is the assessment of large areas with significant biodiversity values, meaning that the identification of threats and pressures to conservation attributes, as well as monitoring activities are performed at a large scale. Hence, the information and mapping available at the level of a large

area, such as a Classified Area may not be sufficiently detailed to ensure sufficient identification of HCV attributes at the level of the Supply Base (smaller area). The identification of precise HCV attributes at supply base level might not be completely included within the assessments of Protected and Classified Areas, thereby, justifying the specified risk.

The habitats and species vulnerable to forestry operations are identified within the scope of Rede Natura2000 and Habitats and Birds Directive reports. The decision is to keep specified risk for HCV1 and HCV3 attributes and low risk for the remaining HCV. The mitigation measures shall be defined by each company, therefore, no follow-up was given on the proposal to require an Environmental Impact Assessment for every raw material entry.

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

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

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

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

Indicator 2.2.5 The process of residue removal minimises harm to ecosystems

Concerns were raised on the lack of compliance from forest operators with the mandatory filling in and delivering of the sanitary manifest for pine nematode. From the findings on indicator 1.1.2: "In 2016, SEPNA inspected 24'535 vehicles carrying wood logs and pallets and identified 424 violations (1.7%) of which 295 refer to the lack of NMP manifest (1.2%) [[Activity Report 2016](#)]." Furthermore, the figures above refer to inspections happening prior to the production plant, where, the probability of receiving material without the required and legal documentation would be less or inexistent. Receiving raw material without the proper documentation would be considered as a non-conformity on FSC CW certification, hence the companies would not accept material that don't follow the legal requirements. It is considered that the actual rate of violations shows an appreciable application of the legal requirements. Low risk is considered for this indicator. Even more so for the production plant, where the number of violations would be less or inexistent and the cargo will not be accepted. This situation would be considered as a non-conformity on FSC CW certification, hence the companies would not accept material that doesn't follow the legal requirement.

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

Concerns were raised over the extension of clear cuts for which a maximum threshold is not defined for every region of the country, hence potentially presenting a specified risk on the degradation of water resources. For interventions on areas above 50 ha, an Environmental Impact Assessment is mandatory. If the area is identified as sensitive, the threshold drops to 10 ha. At the same time, a Forest Management Plan is mandatory for properties above the area defined in the applicable Forest

Regional Plan (PROF). The Forest Regional Plans which were under revision in the 2017/2018 period are in force since February 11th 2019 and the applicable minimum property threshold was decreased, hence covering more properties than nowadays.

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

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

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

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

3.3 Stakeholders' consultation coordinated by SBP central office – December 7th 2017 to February 16th 2018

The draft RRA for Portugal version 7.2 from December 7th 2017 was available for public consultation by SBP central office until February 16th 2018. One comment was received from a stakeholder (see annex 2) and forwarded to the coordinator of the Working Group, ANPEB, to be studied and included in this document.

The comment received brought new elements to the discussion, within the working group, related to indicators 2.2.2 and 2.2.6. The new elements and general rationale were considered valid and through that, a review of these indicators' risk evaluation was performed and specified risk was established for specific situations, explained in Annex 1.

SBP central office also suggested that Portuguese biomass producers were to be contacted by the coordinator of the working group to reengage them in the process, presenting them with the comments received by SBP. ANPEB agreed with this approach asking for comments from Portuguese biomass producers via email on March 2nd 2018. From March 5th to March 9th 2018, ANPEB contacted the Biomass Producers via telephone in order to further discuss possible changes in the RRA draft.

One biomass producer considered that social aspects and functions of SFM should be highlighted more in the NRA. The BP considered that small owners are not interested in all ecological and social aspects of sustainable forest management.

We would favour a discussion on the final draft with biomass producers, the associations of forest owners, and logging enterprises to discuss the results of the risk analysis and the development of mitigation measures.

The working group responsible for the development of the presented RRA believes in the joint effort of a variety of stakeholders included in the Technical Commission 145 that produced the document we have available at this moment. The representativeness of the forest sector within the working group is very significant as it is described in the RRA. Furthermore, all Biomass producers were

invited to join working meetings and were sent the different versions of the Draft RRA asking for commentaries and participation.

The Draft RRA for Portugal was clearly used by BP1 on the development of the company's SBE as can be clearly seen by comparing the two documents. For that, we assume that the work performed by the Working Group was indeed relevant and not as poor as the message suggested.

The RRA intends to assess, among others, the legislation, reports, common practices, surveillance and monitoring actions applied to the forest and, through that, identify the existing risk of each indicator not being clearly fulfilled. The instruments and methodologies used by each company to mitigate the identified risks are defined by the company itself and should not be imposed by the working group.

Another biomass producer highlighted that the RRA and the SBP framework allows the economic valorization of forest residues and stem wood which are not considered suitable for sawmills (quality) but shall have a more valuable use than direct combustion on dedicated biomass power plants.

Within this scope, sources of raw material that don't fall under the common scope of FSC or PEFC certification initiatives in Portugal, such as invasive species, residues from the maintenance of public parks and roadways, small suppliers, among other examples, can be assessed, integrated in production (added value) and following the provisions of the Supplier Verification Protocol, classified as SBP-compliant biomass.

It is impracticable to integrate specific mitigation measures in the RRA that apply to the whole country because each entity will have to frame its raw material supply based on region, source, forest species, forestry areas, supply chain and classified areas (REN, RAN, Natura 2000, RNAP, etc.). Moreover, and perhaps more importantly, each biomass producer will have to assess their supply base regarding the results of field inspections and activities involving raw material suppliers.

3.4 SBP Workshop in Portugal June 29th 2018

On June 29th 2018 SBP and ANPEB organized a workshop dedicated to the subject of the implementation process of the certification system in Portugal. The workshop was held in Lisbon, at 3K Europa Hotel and was attended by the major pellet producers in Portugal, SBP board, Drax, Portuguese forest authorities, ASI as the accreditation body of the SBP certification system, certification bodies, Universities and forest consultants, among other stakeholders.

The morning agenda included presentations from SBP CEO, Carsten Hiujlius, Drax Sustainable Sourcing Manager, Stuart Harker, ASI Supply Chain Manager, Ana Dahlin, Francisco Dias from Pinewells and Lehnart Holm from Control Union.

The afternoon agenda focused on the SBP RRA status, discussion about sensitive indicators and next steps to take to finalize the project.

The common conclusion agreed upon by the attendees of the workshop was that the SBP Standard 1 is a relatively open document in order to be applicable to different regions and forestry realities. For that reason, its dispositions shall be interpreted and adapted accordingly to the assessed areas.

It was regarded as a necessity by the attendees to clearly define, within the scope of the RRA, several notions specific to Portugal, regarded as a necessity by the group. It was agreed that a new working group meeting within the CT 145 framework should be scheduled before August 2018 in order to discuss and accommodate the inputs received in the workshop.

3.5 Revision Version 8.3 – November 5th 2018

The outputs from the SBP Workshop organized in Lisbon and the working group meeting held on July 20th, as well as several calls with relevant stakeholders are included in version 8.3 of the Draft RRA from November 5th 2018 and are as following:

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

The risk evaluation for this indicator was considered to be low by the stakeholders approached in this final revision process. It is considered that there are systems in place to trace the feedstock primary origin back to the forest stand, namely through the manifests, invoices and transportation documents.

Portugal presents a low Corruption Perception Index (63). There is a high level of law enforcement and surveillance for manifests, invoices and transport documents which are considered reliable sources of information.

Indicator 2.1.1 Forests and other areas with high conservation values are identified and mapped

It is considered that HCV are well identified and mapped within the several conservation and protection frameworks of National and European character established in Portugal.

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

The majority of the settlements of Pinus Pinaster, Eucalyptus, Pinus Pinea and even Quercus Suber are originated from afforestation activities for timber production as well as for non-timber products and, thereby, are not considered as natural forest. Forestry activities within RNAP, where areas of natural forest are more likely found, are very limited. The risk evaluation was changed to low for this indicator taking into consideration the inputs from the stakeholders approached.

Indicator 2.6.1 Appropriate mechanisms are in place for resolving grievances and disputes, including those relating to tenure and usage rights, to forest management practices and to work conditions

Portugal has a score of 80 out of 100 on the “Rule of Law” indicator of the World Bank Governance. This indicator “captures perceptions of the extent to which agents have confidence in and abide by the rules of society, and in particular the quality of contract enforcement, property rights, the police, and the courts, as well as the likelihood of crime and violence.”

Considering the positive score achieved in this indicator by Portugal and given that countries with approved RRA have lower scores in the same indicator, stakeholders considered unreasonable to define “specified risk” for indicator 2.6.1. It is recognised that there are some issues with the cadastral system relating to landowners being able to prove their right to the land, however, the systems in place in Portugal are appropriate to ensure that grievances and disputes are investigated. Therefore, the overall risk for this indicator is considered low.

3.6 Final consultation period

From November 26th till December 21st 2018, version 8.4 of the Draft RRA was put to consultation. The aim of this quick consultation period was to present stakeholders with the latest developments introduced in the document.

From the comments received, the document was altered and submitted to SBP, identified by draft version 8.5 from February 2019.

The major changes made on draft version 8.5 concerned the risk evaluation established for indicator 1.2.1, and the regional approach on indicators 2.2.2 and 2.2.6 that was removed, the specified risk being applicable to the whole country. Stakeholders requested for mitigations measures to be inserted on each indicator respective table found in Annex 1. Mitigation measures are not included within this document but are to be proposed by the Biomass Producer and then reviewed by the Certification Body.

Draft version 8.5 was circulated among key stakeholders and experts who asked for additional clarifications and documental elements to justify the risk evaluation for the indicators below. Regional approach was removed from the risk evaluation of indicator 2.2.1, considering the comments received. Updated data were inserted where clarification was requested, namely indicators 2.2.5, 2.4.1, 2.4.2 and 2.6.1. The most relevant indicators addressed by comments are presented below.

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

The defined supply base is Portugal Mainland. The documentation described in the findings provides sufficient elements to trace back the raw material to the defined supply base.

Despite the fact that the felling manifest requirement is not effectively applied, there are other legal requirements that ensure the traceability of the feedstock to the supply base:

- Invoices
- Waybills
- CRM (Customer Relationship Management)
- Economic Operator Registry required for the nematode harvesting manifest

The issuance of the required transport and sales documents is well understood and regulations are largely adhered to. Inspections are common on Portuguese roads and enforcement of regulations is seen to be good. Statistics from these inspections are presented in the RRA.

As evidenced by the low Corruption Perception Index of Portugal (63), documents such as invoices and transport documents can be seen as reliable sources of information.

There are common practices perfectly established by the pellet producers in order to comply with FSC CW requirements relying on the verification of major suppliers of raw material through the sampling of a determined number of loads, established by the FSC CW framework.

The Phytosanitary harvesting manifest includes the identification of the origin of the raw material. Also, documentation for transportation identifies the origin of the transport which could be useful in case of direct transport to BP facilities and in any case is useful in the traceability of material. Both are the most common ways to trace back to the origin even if the origin area is not the forest land itself but the freguesia (parish) (minimum administrative division) where forest land is included.

There isn't an unique system in place to trace the feedstock primary origin back to the forest stand, but it is possible to do so if there are elements in the manifests or transportation documents, which could be used in the cadastral system (like the article number and section) or geographic coordinates in areas without a cadastral system.

There has been significant discussion and debate on this indicator, but it was finally agreed that there are sufficient regulations in place, and there are public authorities in place who organise regular surveillance audits. The requirements of the EUTR also ensure that feedstock is traceable.

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

Cadastral procedures are commonly considered to be difficult and complex. Challenges associated with cadastral works include the cost as well as the lengthy time frame for completion.

While the scale of this issue is broad, the impact has been evaluated as limited. Despite the complexities concerning land tenure and management rights (mainly due to the absence of geometric cadastre information), there is no significant evidence, at national level, of conflicts or disputes about the issue.

Following the implementation of EUTR and the respective Due Diligence System, as well as voluntary Chain of Custody Certifications (mainly FSC CW) adopted by the biomass producers, several documents are already collected by biomass producers in order to prove the origin and legality of the raw material.

It is also considered, among stakeholders, that there is a reduced number of cases related to theft of timber and illegal use of land. The risk can be considered as low, since a reduced number of occurrences is identified and the extent of the impact that might be caused is negligible.

In cases where there is an illegal harvest of trees which are not included in the contract of sale, it is common for the parties to reach an agreement on the compensation to be paid for trees cut illegally. At the same time, it is common knowledge that members of rural communities, characterized by the fragmented structure of property, consistently recognize the boundaries of their property, as well as neighbouring property owners, thereby alerting them to activities they consider suspicious. In the case of illegalities, concerning theft or similar, there are well implemented legal procedures that allow the identification of those responsible. In addition, there is no significant evidence, at national level, of conflicts or disputes about land tenure and land management rights.

Finally, Portugal has a score of 80 out of 100 on the “Rule of Law” indicator of the World Bank Governance. This indicator “captures perceptions of the extent to which agents have confidence in and abide by the rules of society, and in particular the quality of contract enforcement, property rights, the police, and the courts, as well as the likelihood of crime and violence.” [World Bank Governance].

Low risk is considered to be sufficiently justified in the findings. The SBP standard also includes a compliant mechanism over and above the requirements in Portugal.

Indicator 1.3.1 Feedstock is legally harvested and supplied and is in compliance with EUTR legality requirements

Tax returns related to income tax payments (individually or as collective entities) as well as non-debt declarations are available to third parties upon request via web application to the tax authorities.

Also, the VISA Report 2013 ([here](#)) states that shadow economy in Portugal is 19% (EU average is 18.5%) well below countries with approved SBP RRA, like Estonia, Latvia and Lithuania with respective figures of 28, 26 and 28%. Shadow economy is considered as economic activity that is undeclared and for which taxes that should be paid are not. Manufacturing, construction and wholesale and retail have the highest share in shadow economy. The report does not mention forestry as a fraudulent activity.

Updated information is available regarding the application of EUTR regulation and Nematode Management Plan, from which the information below was taken.

From the [EUTR implementation report in Portugal](#) (March 2013 – December 2018) the following information is observed:

Between 2015 and 2018, a total of 87 inspection actions were carried out by ICNF, corresponding to 99 transactions of inspected products, with 42 transactions corresponding to placements on the market originating outside the European Union.

In 2018, ICNF carried out 47 inspection actions, where 56 market placements were inspected for timber and derivatives products and 24 correspond to imports of products originating in non-EU countries. Until December 2018 no violations were registered.

GNR carried out, in the period between 2014 and 2018, 647 inspections resulting in 25 violations, from which only 8 were related to the introduction of illegally harvested timber in the EU, or 1.2%.

GNR SEPNA carried out, in 2018, an operation aimed at the inspection of vehicles transporting coniferous timber and timber products called “[Resina 2018](#)”. GNR monitored 24115 vehicles

transporting coniferous material, such as pallets, planks, beams, trunks, plants, woodchips and other derivatives, and 628 violations were detected, of which stand out:

- 583 for unreadable marking of wood, especially on pallets, which atone for the treatment thereof for the elimination of the disease;
- 34 for total absence of marking;
- **4 for lack of a phytosanitary passport, mandatory for the movement of wood**

It is considered that low risk is justified for this indicator.

4 Interpretation guide for Portugal

For the purposes of the present document, the glossary of terms produced by the Forest Stewardship Council identified as “[FSC-STD-01-002 Glossary of Terms April 2016](#)” is used. To make the RRA as clear as possible, the following interpretations are made to address specific properties and reality of the Portuguese forest and forestry activities.

The concept of Forest and Plantations

Throughout this document and specifically on indicator 2.1.3, 2.2.2 and 2.2.6, the terms “forest” and “plantation” take, respectively, the definitions of “natural forest” and “plantation”, from FSC Glossary of Terms. In the SBP workshop (June 2018) this was proposed as a way to establish an assessment threshold to the type of forests existing in Portugal. The working group decided to approach this issue as in the indicator 6.9 of the FSC Forest Management Standard for Portugal.

The Portuguese forest is defined by its recent origins and by heavy human intervention. Forest covered 4 to 7 percent of the mainland in 1870 and has seen an increase to cover more than 30 per cent in less than 100 years. [1] Through the analysis of figure 1, it is possible to verify that the increase in forested area, from 1880 to 1960 was supported by afforestation activities using coniferous species (green line, mainly *Pinus Pinaster*) and deciduous species (yellow line, several species of oaks). Eucalyptus area is represented by the blue line.

The great majority of these afforested areas do not possess the characteristics of natural forests and are used, mainly, for productive purposes of both timber products and non-timber products.

It is valid to assume that the remaining forest ecosystems comprising primary and natural forests are protected under the Fundamental Nature Conservation Network (RFCN) (defined by Decree-Law No. 142/2008, amended by Decree-Law No. 242/2015, 15th October) which lead to establish the Sistema Nacional de Áreas Classificadas [National Classified Areas System].

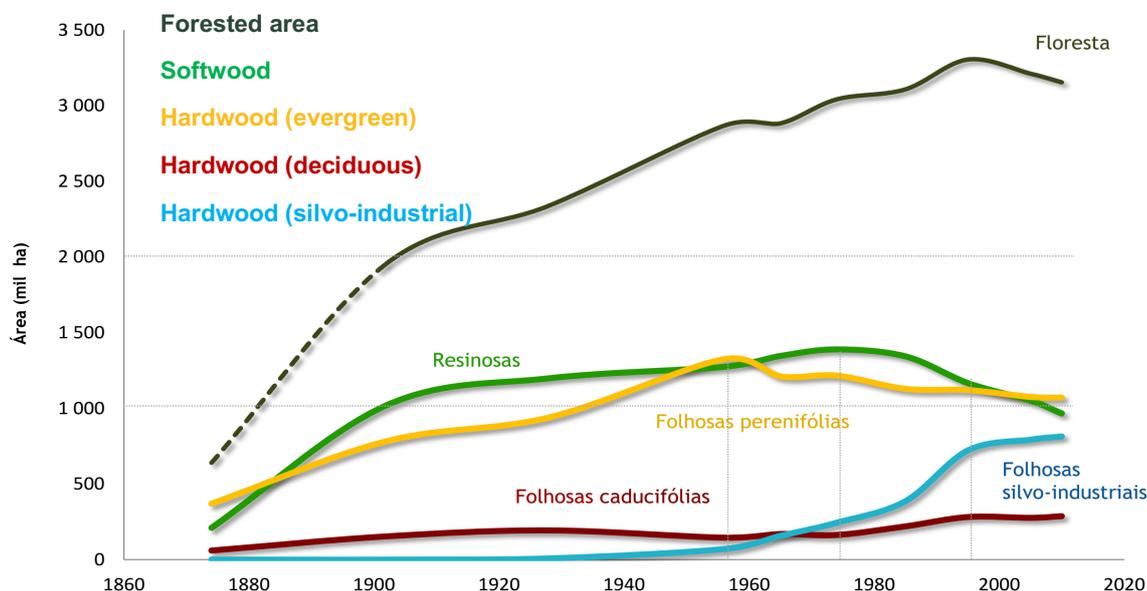


Figure 2 Historic evolution of the Portuguese forest cover 1874-2010

Pinus pinaster stands are not typically subject to clear cuts for the purpose of planting another tree species. Only 12 000ha *pinus pinaster* were converted to another species in a period of 5 years, that is, an equivalent to 2400ha / year. [\[RJAAR – Nota informativa nº 10\]](#)

It is important to highlight that *Pinus Pinaster* is autochthone in the northern maritime coast of the country, undergoing an expansion in the 12th and 13th century when it was used, mainly, for the containment of dunes. It was only in the second half of the 19th century that there was an expansion to mountain areas in the interior of the country. Furthermore, coastal areas with recognized biodiversity importance are considered on Natura2000, hence providing a solid protection framework for *Pinus Pinaster* stands in the referred areas.

Habitat features – old trees:

Considering the handbook produced by INIAV about the [good practices applied to Pinus Pinea settlements](#) there are, among others, 3 considerations that should be addressed:

- 1) Plant spacing upon the installation of the plants
- 2) Pruning
- 3) Thinning

The main purpose of *Pinus Pinea* trees is to produce Pine Cone. Thereby the plant spacing upon the installation of the plants is very important. It's recommended to use a wide plant spacing of 5X5 to 8X6 m which represents from 208 to 400 plants per hectare. This will allow for the canopies to grow wide, favouring sun exposure and ventilation, which, together improve pine cone productivity.

Pruning and thinning are mandatory forestry practices through the lifespan of a *Pinus Pinea* settlement of about 80 years.

3 pruning actions are recommended accordingly to the following:

1st pruning: Occurs, usually, at the age of 5/6 years. The branches from the lower part of plant are removed until the first 2/3 or 1/3 of the total height of the tree.

2nd pruning: At the age of 10/12 years depending on the development of the settlement. This action, commonly, coincides with the first thinning. Again, the branches from the lower part of plant are removed until the first 1/3 of the total height of the tree.

3rd pruning: Usually occurs at the age of 20/25 and it coincides with the second thinning.

The thinning should occur every time the canopies touch each other.

1st thinning: at the age of 10/12 years, the plants are competing with each other and it is necessary to reduce the number of plants in order to decrease the competition for light, water and nutrients. At this stage, around 40% of the trees are cut through a selective thinning in order to select the ones with the highest productive potential.

2nd thinning: at the age of 20/25 years, again the trees with the best productive potential are selected. Trees with closed canopies and higher needle density are removed due to their expected lower productivity. Trees with broad canopies, lower needle density and branches as horizontal as possible are kept, since these tend to get a more efficient use of sunlight and air, thereby achieving better productivity. At the end of this stage, regular settlements should present a tree density not higher than 100/120 trees per hectare.

At the Forest Management Unit level, it is usual practice to perform extraordinary thinning on older settlements (more than 40 years) when trees show signs of decay or if older trees with poorer productivity are competing with younger plants with higher production potential. At the same time, following the first general rule on settlement management, if the canopies of neighbouring trees touch each other, decreasing ventilation and sunlight exposure, thereby reducing productivity, selective thinning is carried out.

Studies confirm the positive effect of thinning on pine cone productivity in *Pinus Pine* settlements. [\[Moreno-Fernandez, Daniel et al\]](#) [T. MECHERGUI, et al]

In the case of Pinus Pinaster, the [Good practices handbook](#) produced by Centro Pinus suggests a tree density, at the time of the installation of the settlement, from 1250 to 1670 plants per hectare. Pruning occurs at 5/10 years and 10/20 years. The first Thinning occurs at 10/20 years, provided that the trees have a minimum height of 10 meters. At this point 30 to 40% of the trees shall be removed in order to achieve a density of 1000 trees/ hectare.

At 20/30 years old the settlements go through the second thinning, which eliminates circa to 30% of the trees to an approximate density of 700 trees/ hectare.

In conclusion, during the rotation/ lifespan of a Pinus Pinea settlement, the number of trees can be reduced from a half to a quarter of the trees planted in the first place. For Pinus Pinaster the number of plants can be reduced to a half. Therefore, Pinus Pinea and Pinus Pinaster settlements are an important source of raw material supply for biomass production both due to pruning and thinning actions.

At this point, it is important to differentiate the processes of continuous clear cutting over several hectares and thinning. Thinning is a process of selective cutting with the objective of improving the settlement productivity and does not occur in a continuous and contiguous pattern hence, it does not present the potential effects on soil erosion, protection against floods and biodiversity of continuous clear cuttings. Raw material originated from thinning and pruning should be considered as a by-product from forestry even in the case of large diameter trees that have to be removed due to sanitary reasons, low productivity, competition with trees with more vitality and other similar situations.

For the purposes of feedstock assessment and its inclusion into the production of compliant material, an old tree shall only be considered as a habitat feature as long as its age and size noticeably differs from the average age or size of the settlement. In practical terms, a selective and non-continuous cutting of trees in a regular settlement with trees of the same age, shall not be considered as a final cut and, thereby, the mentioned trees shall not be considered as habitat features. This is applied to several tree settlements, such as Pinus Pinaster, Pinus Pinea, Eucalyptus, among others.

5 Conclusions

Based on the information available during the risk assessment process, the level of risk for each of the criteria was chosen. Below is the summary of the indicator for which specified risk was identified.

For indicators where the risk is defined for the whole country, no remarks are needed. For the ones where low risk is defined for certain areas/conditions and not for others, a remark is made in order to highlight that there are specificities that must be observed. These cases are clearly identified in the detailed findings of the respective indicators.

Indicator	Specified Risk	Low Risk	Remarks
1.1.1		X	
1.1.2		X	
1.1.3		X	
1.2.1		X	
1.3.1		X	
1.4.1		X	
1.5.1		X	
1.6.1		X	
2.1.1		X	
2.1.2	X		HCV 1 and HCV 3. Detailed information in Annex 1.
		X	HCV 2, HCV 4, HCV 5 and HCV 6. Detailed information in Annex 1.
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	
2.3.1		X	
2.3.2	X		
2.3.3		X	
2.4.1		X	
2.4.2	X		Specified risk regarding the management and prevention of fire occurrences.
		X	Low risk on the management of pests and diseases linked to 2.4.1
2.4.3		X	
2.5.1		X	
2.5.2		X	
2.6.1		X	
2.7.1		X	
2.7.2		X	

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

Annex 1: Detailed Findings for Supply Base Evaluation Indicators

	Indicator
1.1.1	The Supply Base is defined and mapped.
Finding	<p>This SBP RRA covers feedstock coming from material originating in Mainland Portugal.</p> <p>In Mainland Portugal, private property from private owners (89%) and community (Baldios, 8%) correspond to 3,060 million hectares of forests (97% of total forest land), including 5.7% property of industry companies. Public areas are up to 3% (around 94,000 ha).</p> <p>Directorate-General of Territory (DGT) provides, in its webpage, maps with cartographic information for scales up to 1:50 000. (here)</p> <p>Within the framework of the territorial planning instrument at municipal level, the Municipal Director Plan, several plants are provided at appropriate scale. (example here)</p> <p>The Geographic Institute of the Army has the cartographic survey of the Portuguese Territory at a scale of 1:25 000.</p> <p>Regarding species, the most relevant in terms of pellet production are Pinus Pinaster (Maritime pine/Pinheiro bravo) 23% of forest surface 714,000 ha, Eucalyptus spp. (Eucalyptus/Eucalipto) 26% of forest surface 812,000 ha and Pinus Pinea (Stone pine/Pinheiro manso) 6% of forest surface 175,000 ha. [IFN6] It is important to highlight that Pinus Pinea is mainly used for the production of Pine nut and mostly the thinning and pruning by-products are used for pellet production. Pinus Pinaster and Eucalyptus spp. are spread all around the country. Pinus Pinea is more abundant in the South. All other species present in Mainland Portugal: Quercus suber (Cork oak/Sobreiro), Quercus ilex (Holm oak/Azinheira), Quercus spp. (Oaks/Carvalhos), Castanea sativa (Chestnut/Castanheiro), Fraxinus spp. (Ash/Freixo), Alnus glutinosa (Alder/Amieiro), are not commonly used for economic applications.</p> <p>Despite the incomplete geometric cadastre of the rural real estate, maps are available, from several sources at an appropriate scale to define geographically the origin of the supply base. The information available from delivery notes, felling manifests, invoices, among other legal documents, which contain the origin of the raw material (County, village) serves as definition of the source which enables, supported on maps available, the mapping of the supply base.</p>
Means of Verification	<p>The Scope is defined and justified;</p> <p>Maps to the appropriate scale are available;</p> <p>Key personnel demonstrate an understanding of the supply base</p>
Evidence Reviewed	<p>Estratégia Nacional das Florestas (RCM n.º 6-B/2015 - Diário da República n.º24/2015, 1º Suplemento, Série I de 2015-02-04); ICNF portal(http://www.icnf.pt/portal/icnf/docref/enf)</p> <p>Inventário Florestal Nacional IFN5 (FloreStat_IFN5); ICNF portal (http://www.icnf.pt/portal/florestas/ifn/ifn5/rel-fin)</p>

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

	Indicator
1.1.2	Feedstock can be traced back to the defined Supply Base.
Finding	<p>Information obtained from Centro Pinus (non-profit association for key players of Pine based industry), INE and others shows that pine wood consumption of timber industry in 2014 was 4,360,000 m³ (1,300,000 m³ saw mill industry, 30%; 300,000 m³ biomass, 7% and 1,400,000 m³ pellets, 32% and 1.360.000 other uses not relevant for the pellets industry). However, in 2014 there was available only 2,247,000 m³ of pine wood from Mainland Portugal (Pinus Pinaster). As an obvious conclusion, a lot of imported pine came into the Portuguese timber industry in 2014, mostly from Spain.</p> <p>A similar situation occurs for Eucalyptus in the pulp and paper industry, whose low quality parts may also be used in the biomass industry. Information from the Annual Bulletin of CELPA (Paper Industry Association) states that in 2014 45% of the total eucalyptus wood procured by the paper industry was imported (2,415,000 m³ imported), in its vast majority round wood from Spain and to a minor extent, chips from South America or Africa (usually FSC/PEFC certified or controlled).</p> <p>Based on the fact that relevant volumes of imported material come into Portugal annually, it is relevant to note that imported material is not covered by this RRA.</p> <p>A felling manifest (notification given to the authorities) is obligatory for all common commercial harvesting activities and shall be submitted to forest authorities (ICNF) up to 30 days after the felling operation. (DL 174/88 May 17th).</p> <p>Specific regulations cover harvesting activities in the following cases:</p> <ul style="list-style-type: none"> ○ Cork collection, in which the regulations define the procedures for harvesting cork (diameter, age of cork, etc.); however, there is no licence, permit or records associated with the regulations; ○ Cork oak and holm oak pruning and harvesting, with the regulations defining the seasonal requirements and other technical procedures, and a licence is issued by the forest authorities (ICNF); ○ Premature harvesting of eucalyptus and Pinus Pinaster; the regulations define minimum diameters for cutting of these species for commercial use, and a licence shall be issued for such cases (DL 173/88 May 17th);

- Phytosanitary procedures associated with NMP disease, applying to Pinus Pinaster and all conifers, with different levels pertaining to specific geographic areas of the country. (DL 123/2015, July 3rd)
There is an obligation of previous communication of any felling and/or transportation of wood potentially affected by this disease. The document (phytosanitary manifest) must accompany the material until the arrival at industrial processing facilities. This is mostly focused on Pinus Pinaster and Pinus Pinea (around 30% of forest area) as the main source of raw material for the BP. The phytosanitary manifest is issued using an online platform that requires the forest operators to be registered and to provide information about the legal person tax number, headquarters address, name of the owner, main activity and email.
- In public and community-owned forests, harvesting is authorized by ICNF (Institute for Nature Conservation and Forests).
- Species along the water line which form riverine galleries are part of the public hydric domain and felling of these requires authorization from APA Portuguese Environmental Agency (Law No. 54/2005, dated 15th November).

The mentioned specific regulations give the biomass producer the possibility to identify the provenance of the feedstock up to the parish (freguesia) level.

The felling manifest (general forestry activities), as well as the NMP phytosanitary manifest, contain the following information:

- Operator or service provider information (tax number, contacts)
- Localization of the feedstock at the parish (freguesia) level
- Quantities harvested
- Date for the completion of the operations

Since 2013 and the introduction of the EUTR laws, operators are required to register their activities on a Digital Platform managed by forest authorities (ICNF) called RIO – Registo Inicial de Operador [initial registry of the operator]. Data from the [implementation report of EUTR from December 2017](#) show that 4067 companies were registered at the end of 2017. This document reported a total number of 531 inspections performed by ICNF, GNR [National Republican Guard], AT [Tax Authority] and other relevant entities, from 2014 to 2017, organized to inspect the application of the EUTR dispositions and only 1 violation was identified.

Operators, on the EUTR framework, must apply a Due Diligence System to justify the legality of timber. Through this system, the operator shall be able to get information about the provenance, quantities received, supplier, transportation and compliance with legal requirements, including:

- Regular invoice for trading operation or transport documentation or waybill (Tax Authority), or return note;
- CRM (Convention on the Contract for the International Carriage of Goods by Road) on international transportation
- In the case of pine or conifers timber, the transporter must have an Economic Operator Registry and a phytosanitary Manifest for each felling (if one felling is transported several times it is mandatory to copy the manifest for all the transportations).
- Other legally required documents.

Waybills and invoices, which are mandatory in the transport and transaction of goods shall contain the following information ([Association of accountants](#)):

- Name or company name of the seller of the goods
- Address of the seller
- Tax number of the seller

	<ul style="list-style-type: none"> ▪ Name or company name of the buyer of the goods ▪ Address of the buyer ▪ Tax number of the buyer ▪ Designation of the goods, including quantities ▪ Loading and unloading locations ▪ Date and hour when the shipment starts. <p>Several public authorities, such as SEPNA (Department of National Republican Guard responsible for environment surveillance), ASAE (National Authority for the Food and Economic Safety) and ICNF, organize regular surveillance activities to verify the compliance of forest operators and wood transportation companies with the dispositions of the National Action Plan for Control of Pinus Wilt Disease. In 2016, SEPNA inspected 24,535 vehicles carrying wood logs and pallets and identified 424 violations (1.7%) of which 295 refer to the lack of NMP manifest (1.2%) [Activity Report 2016].</p> <p>Conclusion:</p> <p>There are systems in place to trace the feedstock primary origin back to the forest stand, namely through the manifests, invoices and transportation documents.</p> <p>Portugal presents a low corruption perception Index (63). There is a high level of law enforcement and surveillance for manifests, invoices and transport documents which are considered reliable sources of information.</p> <p>On the above background, the risk related to the traceability of feedstock back to the supply base is evaluated to be low.</p>
Means of Verification	<ul style="list-style-type: none"> • Copy of phytosanitary manifests (felling and/or transportation) for all conifers with geographic elements (cadastral and/or coordinates); • Copy of delivered felling manifest to Forest Authorities (ICNF) for all commercial harvestings with geographic elements (cadastral and/or coordinates). • Invoices, waybills, transport/shipping documents • The existence of a strong legal framework in the region • Feedstock inputs, including species and volumes, are consistent with the defined Supply Base; • Transport documentation and goods-in records are consistent with the defined scope of the SBE.
Evidence Reviewed	<p>Estratégia Nacional das Florestas (RCM n.º 6-B/2015 - Diário da República n.º24/2015, 1º Suplemento, Série I de 2015-02-04); ICNF portal (http://www.icnf.pt/portal/icnf/docref/enf)</p> <p>Estatísticas Agrícolas 2015.xls, Instituto Nacional de Estatística (https://www.ine.pt/xportal/xmain?xpid=INE&xpgid=ine_publicacoes&PUBLICACOESpub_boui=271434407&PUBLICACOESmodo=2)</p> <p>Boletim-Estatístico-da-Celpe-de-2014 (http://www.celpe.pt/wpcontent/uploads/2016/09/Boletim_WEB_2015.pdf)</p> <p>Relatório-de-Characterização-da-Fileira-Florestal-2014 (http://www.aiff.org.pt/assets/Relatorio-de-Characterizacao-da-Fileira-Florestal-2014-160p-CAPA-3-spread....pdf)</p> <p>Cutting Permission in Law No. 33/96, of 17/08 (article 7th) (https://dre.pt/application/dir/pdf1sdip/1996/08/190A00/25682573.pdf)</p> <p>Fileira do Pinho: desafios e oportunidades (centroPINUS_JoaoGoncalves dados Fileira pinho 2014.pdf); Centro Pinus (http://www.centropinus.org/index.php?lingua=1)</p>

	<p>Decreto-Lei 123-2015 nemátodo do Pinheiro (https://dre.pt/application/file/67649256); ICNF portal (http://www.icnf.pt/portal/florestas/prag-doe/ag-bn/nmp)</p> <p>Declaração Retificação n.º 38/2015 de 01/09 do Decreto-Lei 123-2015 nemátodo do Pinheiro (https://dre.pt/application/file/70144398)</p> <p>Decreto-Lei 174-1988 manifesto corte (https://dre.pt/application/file/374768); ICNF portal (http://www.icnf.pt/portal/icnf/serv/formularios/manif/man-cort-arr-arvor)</p> <p>Decreto-Lei 169-2001 Sobreiras e azinheiras (Decreto-Lei 169-2001 Sobreiros e azinheiras.pdf); ICNF portal (http://www.icnf.pt/portal/icnf/serv/formularios/sobrazinh)</p> <p>Registo de Operador de Madeira e Derivados ICNF portal (http://www.icnf.pt/portal/florestas/fileiras/reg-op)</p> <p>Decreto-Lei 198/2012 de 24/08 FATURAS E OUTROS DOCUMENTOS COM RELEVÂNCIA FISCAL (http://info.portaldasfinancas.gov.pt/NR/rdonlyres/907FD2F4-9A9C-485D-8A99-FD164BF9FCEC/0/Decree-law%20n%20_198_2012_24_08.pdf)</p> <p>Transparency international, corruption perception index Portugal (https://www.transparency.org/country/#PRT)</p>
Risk Rating	<p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>

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

	Indicator
1.2.1	The legality of ownership and land use can be demonstrated for the Supply Base.
Finding	<p>In Portugal, land ownership and management is regulated in line with point 1_1_Legal rights to harvest. (Annex C2, FSC CW NRA).</p> <p>The <u>Real Estate Cadastre (Cadastro Predial)</u>, the <u>Finances Matrix (Matriz das Finanças)</u> and the <u>Real Estate Registry (Registo Predial)</u> constitute an inseparable part of the management of property and of the rural and urban buildings, as well as of the</p>

acts practised on them (building refers to any real estate property be it rural or urban, agricultural or forest, comprising edification or not):

- The Real Estate Cadastre strictly defines the characteristics of each rustic or urban building, namely the location, configuration, limits and areas of the property and its built-up parts, being based on orthophotomaps with official validity. The Cadastre comprises other complementary information such as easements and restrictions, use and occupation, encumbrances or charges, urban parameter value, licences, etc. The information is provided through the Internet on the webpage of Directorate-General of Territory, [here](#);
- The Finances Matrix, which is divided into a rustic land matrix and urban land matrix, constitutes the fiscal inventory of all rural and urban properties of each village or county, to which it has to be reported, sooner or later, any acts that alter the features, change of use or owner, among others, in order to formalize these acts;
- The Real Estate Registry, which takes place in the land registry office, is the official archive where all property rights and other rights as well as charges on the real estate are registered and confirmed, without updated knowledge of which no legal act (purchase, sale, Mortgage, etc.) can be carried out on a rustic or urban building, or on a part or fraction of such.

53% of the territory is covered by the Real Estate Cadastre (Cadastro Predial) providing a consistent and unequivocal correspondence between the information provided by the Finances Matrix and the Land Registry Office based on the attribution of a unique Land Identification Number (DL 172/95).

In the land registry office (Conservatória do Registo Predial) the ownership of each building is officially registered as well as the identification of its owners and any other rights or obligations on the building or the easements that condition it are registered.

In the books of the land registry, nowadays largely computerized, each registered building has a land description, where the attributes that correspond to it are inscribed and recorded. The real estate description has a unique numerical sequence followed by the date, with a brief description of the components of the building, its confrontations (delimitations) and the article of the matrix, in which the inscriptions of the owners of the property and other information is recorded.

Without the property description coinciding with that of the Finances Real Estate Matrix, and without the respective owner-owner registration being in compliance, it is not possible to formalize any transaction or legality related to the building. The Geo-Referenced Real Estate Cadastre consolidates this correspondence.

The usual way to identify the properties is by the Real Estate registry (Caderneta Predial), which is an extract or datasheet from the Real Estate Matrix of the Finances Department.

It is common knowledge that rustic and urban buildings are inscribed in the finances matrix, above all, because these services send to the owner a list of the respective articles each year (with the exception of properties not quoted in lower value, as is often the case of rural properties), indicating the value of the property, the tax on the properties to be paid, called Real Estate Municipal Tax (IMI).

At present, any change of ownership must be updated in accordance with the requirements of conformance, configuration and ownership, a process that involves, in a joint and integrated way, the three bodies: the DGT, the IRN and the AT (Autoridade Tributária e Aduaneira [Tax and Customs Authority]), by means of a unique numerical code – the número de identificação predial [land registration number] (NIP).

	<p>It is obligatory to update registers for land rights, forestry projects and legal regime for afforestation and reforestation (for example the legal regime...RJAAR). The institutions related to both forestry and agriculture have encouraged owners to update them.</p> <p>Portugal has a score of 80 out of 100 on the “Rule of Law” indicator of the World Bank Governance. This indicator “captures perceptions of the extent to which agents have confidence in and abide by the rules of society, and in particular the quality of contract enforcement, property rights, the police, and the courts, as well as the likelihood of crime and violence.” [World Bank Governance].</p> <p>There are several legal instruments and procedures which allow the identification of illegalities related to illegal logging and legality of ownership.</p> <p>Following the implementation of EUTR and the respective Due Diligence System, as well as voluntary Chain of Custody Certifications adopted by the biomass producers, several documents are already collected by biomass producers in order to prove the provenance of the raw material and its legality.</p> <p>It is also considered among the stakeholders that there is a very reduced number of cases related to theft of timber and illegal use of land. A search on the database of the Institute for the Financial Management and Legal Equipment [instituto de gestão financeira e equipamentos de justiça] on lawsuits related to illegal use of third person private property, tree thefts and illegal logging came back with less than 10 legal cases during the period of 20 years (1,2,3) GNR [National Republican Guard] was contacted to supply statistical data about offenses related to the legality of ownership and there is no registration of offenses. Through the evaluation of the findings the risk can be considered as low, since a reduced number of occurrences is identified and the extent of the impact that might be caused by occurrences of this nature is negligible.</p> <p>The purchase documents (invoice, buyer-seller contract, previous agreement, among others listed here) are considered to be sufficient for the confirmation of legality of the raw material considering that they provide all the relevant information of the seller, namely, name, tax number, address and identification number, most of the times more reliable information than the one found in the land registry permit. All the relevant information is disclosed by the seller of the wood and this sale is declared to the tax authorities through invoicing, assuring the legality of ownership.</p> <p>In the case of illegalities, concerning theft or similar, there are well implemented legal procedures that allow the identification of those responsible. On top of that, there is no significant evidence, at national level, of conflicts or disputes about land tenure and land management rights.</p> <p>All the instruments already applied by the biomass producers allow the traceability of the wood from the land to the factory gate.</p>
Means of Verification	<p>Description on the Land Registry Office (Descrição na Conservatória do Registo Predial)</p> <p>Content certificate matrix article of tax office (Certidão de teor do artigo de Matriz da repartição de finanças) & land notebook (Caderneta predial) is the tax document which confirms payment of taxes.</p> <p>Final judicial decision without appeal right (Sentença judicial transitada em julgado).</p> <p>Forest Renting/leasing contract (Contrato de Arrendamento Florestal)</p> <p>For Collective or Commercial entities the extract from the commercial register (Certidão do Registo Comercial) to prove the specific responsibilities of owners/managers/presidents</p> <p>Purchase documents (invoice, buyer-seller contract, previous agreement)</p> <p>Approved RJAAR</p>
Evidence Reviewed	<p>Government sources:</p> <ul style="list-style-type: none"> •Constitution (Constituição da República Portuguesa)

	<p>•Cadastre at Directorate-General of Territory: Non-Government sources:</p> <ul style="list-style-type: none"> • Transparency International's Corruption Perception Index 2014 at Transparency International The global coalition against corruption – https://www.transparency.org/cpi2015/results •Worldwide Governance Indicators Report at World bank: http://info.worldbank.org/governance/wgi/index.aspx#reports •"O cadastro e a propriedade rústica em Portugal";Fundação Francisco Manuel dos Santos e Rodrigo Sarmiento de Beires, May/2013 (https://www.ffms.pt/upload/docs/o-cadastro-e-apropriacao-rustica-em-portugal_ypUM5ASBAUmUpHUIgJtp0A.pdf) <p>http://elearning.ipca.pt/1213/pluginfile.php/82971/mod_resource/content/1/sumarios_eais_11_12.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	

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

	<p>approved by Decree-Law No. 77/2015, dated 12th May, is effective as of 10th August 2015.</p> <p>The regulations require that the ICNF is given advance notice of any economic activity or operation involving the harvesting, transportation, storing, transformation, import, and export of <i>Pinus Pinea L.</i> and that those carrying out such activities are registered.</p> <p>The legal framework applicable to the application of resin and the circulation of pine resin in mainland territory was approved by Decree-Law No. 181/2015, dated 28th August. This law is effective as of 28th September 2015, with the exception of articles 6 to 9, 'prior notification' and 'registration of a resin operator', which are effective as of 1st January 2016.</p> <p>The regulations require that the ICNF is provided with advance notice of the extraction of pine resin, its import and export, as well as transportation, storage, and entry in an establishment for the first industrial transformation, and that resin operators are subject to registration.</p> <p>In Portugal, tariffs are not differentiated by species or quantity.</p> <p>The focus of the referred inspection activities is:</p> <ul style="list-style-type: none"> · Cork Oak, Holm Oak and Holly operations and also riparian vegetation and protected areas; · Conversion from forest to plantations for areas larger than 350 ha or other uses for areas greater than 50 ha; · The National Action Plan for Control of NMP applies to all conifers and includes a strict phytosanitary plan which requires up-front registration of all operators and notification to authorities, prior to commencement of harvesting, transport and processing of wood (some of the cuttings detailed in the Action Plan are obligatory); · In the case of premature cutting licences, no evidence was found in the field of any implementation of this law. <p>In 2016, SEPNA registered:</p> <ul style="list-style-type: none"> - 247 violations regarding the illegal cutting of protected species; - 295 violations regarding the circulation of coniferous wood without the felling and thinning manifest; - 23 violations related to the circulation of wood without mandatory documents such as invoices, delivery notes, among others. <p>The number of surveillance activities which led to the identification of the above violations wasn't disclosed.</p> <p>The information above shows the presence of a strong legal framework and also the effective surveillance and enforcement of the legal requirements. The verification means available to identify the legality of wood are diverse and, therefore, the risk is considered low.</p>
<p>Means of Verification</p>	<p>Written permit referring applicable legislation in all exceptional cases referred above; Operator registry and previous notification in cases of all conifers because of Nematode Pine Plan (NMP); EUTR Operator Registry:</p> <ol style="list-style-type: none"> 1) Information about the wood/timber products which shall include quality, quantity, the supplier, origin country, and conformity with national legislation; 2) Risk evaluation - of the illegality of the timber by operator of the supply chain, based on the collected information.

	<p>3) Risk minimization - by additional information, verifications if the evaluation reveals specified risks.</p>
<p>Evidence Reviewed</p>	<p>EUTR, implementation assessment (2013-2016) http://www.icnf.pt/portal/florestas/fileiras/resource/docs/ruem-nov2016 Cutting Permission in Law No. 33/96, of 17/08 (article 7) https://dre.pt/application/dir/pdf1sdip/1996/08/190A00/25682573.pdf Cork oak and Holm oak (Quercus suber and Quercus rotundifolia): · DL155/2004, of 30/06 · DL 169/2001, of 25/05 Ilex aquifolium: · DL 423/89, of 4/12 Pinus Nematode: · Dec.Retificação n.º 38/2015 of 01/09 · DL 123/15, of 3/07 · DL 95/2011, of 8/08 · DL 154/05 6/09 · Dec. n. 30-A/2011, of 7/10 Cuttings before maturity of Pinus Pinaster and Eucalyptus: · DL173/88,17/05 Harvesting manifest: · DL 174/88, 17/05 Municipal licences of vegetation destruction: · DL 139/89 High risk areas for harvesting: · Desp. 17 282/2003 Operational cuttings on forest regime areas: · Desp. 18355/2008 Riparian vegetation destruction: · Law 54/2005 15/11 . Environment law No. 19/14 of 14/04 · DL 151-B/2013 of 31/10 https://dre.pt/application/file/513900 · DL 49/05, of 24/02 · DL 197/2005, of 8/11 Timber Operator Registry: · DL76/2013 of 5/06 · EUTR: DL No.76/2013 of 5/06 artºs 3º,8º at https://dre.pt/application/dir/pdf1sdip/2013/06/10800/0322203225.pdf · (UE)Regulation n.º 995/2010 artºs 4º, 5º, 6º http://www.icnf.pt/portal/florestas/fileiras/resource/docs/reg/regulamento-995-2010 Waste and residues laws: http://www.pgdlisboa.pt/Laws/Law_mostra_articulado.php?nid=981&tabela=Law_velhas&nversao=4&so_miolo= Energetic purposes forest biomass definition: https://dre.pt/application/conteudo/70064732 https://dre.pt/application/dir/pdf1sdip/2011/01/00600/0017300175.pdf Government sources · APA-Agência Portuguesa do Ambiente at http://apambiente.pt/index.php; · Municipalities at (<a href="http://www.cm-<NAME>.pt/">http://www.cm-<NAME>.pt/); · SEPNA-Serviço da Protecção da Natureza e do Ambiente/GNR- Guarda Nacional Republicana at (http://www.gnr.pt/default.asp?do=5r20n/DF.zv55n1/Zv55n1) · Instituto da Conservação da Natureza e Florestas at page http://www.icnf.pt/portal/florestas/fileiras/reg-op; · ICNF Report:(http://www.icnf.pt/portal/florestas/fileiras/resource/docs/icnf-ruem)</p>

Risk Rating	<input checked="" type="checkbox"/> Low Risk	<input type="checkbox"/> Specified Risk	<input type="checkbox"/> Unspecified Risk at RA
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Risk Rating	Indicator
1.4.1	<p>Payments for harvest rights and timber, including duties, relevant royalties and taxes related to timber harvesting, are complete and up to date.</p>
Finding	<p>In Portugal payments for harvest rights and timber are not applicable, including duties, relevant royalties and taxes related to timber harvesting such as stumpage fees and other volume-based fees.</p> <p>Only taxes related to timber harvesting are applicable to all economic activities such as value added taxes (VAT) and income taxes (IRS and IRC).</p> <p>VAT (IVA) taxes:</p> <p>A normal tax rate of 23% VAT is applied to the sale of wood. In special cases, a VAT reduction to 6% can be applied to the owner of 'standing wood' or 'standing stock sales'; or even VAT exemption if the owner is a farmer or forester. Invoices must be issued by the seller, but self-invoicing by the buyer may occur in exceptional circumstances if some conditions are met (previous agreement, data conformity, etc.). As no specific evidence of irregularity has been identified in relation to payment of VAT, this requirement is considered Low risk. The payment of VAT is a simple requisition that is easy to verify and legally undertaken by both entities (seller and buyer). The exceptional regimes of reduced taxes or exemption are in place to include the cases of forest owners with special profiles as farmer or forester.</p> <p>Income taxes (IRS & IRC):</p> <p>Income taxes are applied according to individual or collective fiscal laws. No specific evidence of irregularities about income taxes related to harvest companies was found.</p> <p>Fiscal Authorities are Autoridade Tributária, which makes joint inspections on roads together with GNR- Guarda Nacional Republicana.</p> <p>In 2016, SEPNA (Department of the National Republican Guard responsible for nature related activities) registered 26 violations related to wood circulating without purchase invoice or delivery documents.</p> <p>According to the information available, this indicator is classified as low risk.</p>
Means of Verification	<p>Valid invoice/receipts Valid declaration of non-debt taxes IES_ Annual Declaration Proof of Annual declaration IRS/IRC Personal Income Tax Report</p>
Evidence Reviewed	<p>VAT Code CIVA: · DL n.º 102/2008, de 20/6: artº2º 1-a);artº9º 32)List I No.4. Anexo A- IV</p> <p>Income Tax Code for Natural Persons: · DL nº 442-A/88 artº4º nº3,nº4 Updated by Law No.67/2015, de 06/07 Preâ. nº9, artº3 nº1a);nº4; artº4º nº1, nº3 nº4 artº34º</p> <p>Income Tax Code for Corporations: · DL No. 442-B/88 Updated by Law n.º 2/2014 de 16/12, Law No.3/2014 de 16/12 & Law No.4/2014 de 16/12 artº1º, artº2º, artº 3º, artº18º-nº7 ; artº20º nº1 g) artº23º nº2 k)</p>

	<p>· Port. nº 55/2010 21/01 artº2º</p> <p>Government sources</p> <p>· Autoridade Tributária e Aduaneira at: https://www.portaldasfinancas.gov.pt/pt/home.action</p> <p>· Autoridade Tributária e Aduaneira: VAT Exemption and reduction at: http://info.portaldasfinancas.gov.pt/NR/rdonlyres/9A86386D-7EB8-447F-9EAC-CEB67C206BD2/0/INFORMA%C3%87%C3%83O.3526.pdf</p> <p>· Autoridade Tributária e Aduaneira: Self invoicing by the buyer: http://info.portaldasfinancas.gov.pt/NR/rdonlyres/A4FB3349-0071-47FC-97EC-ADE2061C094A/0/Informacao_5332.pdf</p>
Risk Rating	<p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>

	Indicator
1.5.1	Feedstock is supplied in compliance with the requirements of CITES.
Finding	There are no trees in Portugal belonging to CITES appendices. Also, one did not find any direct effect of harvesting or forest management over CITES listed species.
Means of Verification	List of purchased species
Evidence Reviewed	<p>Portuguese legislation:</p> <ul style="list-style-type: none"> · DL 211/2009, 03/09, artº2º, artº4ºartº9º, artº13º · Port nº1225/2009 de 12/10; Portaria nº 1226/2009 de 12/10 · Port nº 7/2010 de 05/01 •Port. 60/2012 de 19/03 <p>EU legislation:</p> <ul style="list-style-type: none"> · Council Regulation (EC) No 338/97 of 9th December 1996 on the protection of species of wild fauna and flora by regulating trade therein, article 4, 5, 7, 8 (http://eurlex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:1997R0338:20080411:EN:PDF) · Commission Regulation (CE) 865/2006, 4th May · Commission Regulation (UE) 2017/160, 20th January · Date of CITES application on EU: JOUE L 189, of 2015-07-17 · European Union page at: http://ec.europa.eu/environment/cites/pdf/trade_regulations/KH7707262PTC.pdf <p>CITES</p> <ul style="list-style-type: none"> · www.cites.org · ICNF page: http://www.icnf.pt/portal/icnf/serv/formularios/cites · CITES Reports: https://cites.org/sites/default/files/reports/13-14Portugal.pdf
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
1.6.1	Feedstock is not sourced from areas where there are violations of traditional or civil rights.
Finding	<p>Portugal, and the Portuguese forest sector, is not associated with violent armed conflict, including that which threatens national or regional security and/or linked to military control.</p> <p>The country is not covered by a UN security ban on exporting timber or any other international ban on timber export, also there are no individuals or entities involved in the forest sector that are facing UN sanctions.</p> <p>Portugal is well positioned in all international reports:</p> <ul style="list-style-type: none"> · Corruption Perception Index scores 63 meaning low perceived level of corruption; · Worldwide Governance Indicators (WGI) from 73.3 to 84.13 (1-100points). The WGI reports six aggregate governance indicators for over 200 countries and territories over the period 1996-2014, covering i) Voice and Accountability, ii) Political Stability and Absence of Violence/Terrorism, iii) Government Effectiveness, iv) Regulatory Quality, v) Rule of Law, and vi) Control of Corruption. <p>On the other hand, Portugal (including human rights, illegal logging, forest and timber) is not listed in alarming reports or indexes such as:</p>

	<ul style="list-style-type: none"> · Committee to Protect Journalists Impunity Index; · Human Rights Watch; · Global Witness · Chatham House · Amnesty International <p>There are no indigenous or traditional people in Portugal that could claim traditional rights to lands, forests and other resources, based on long established customs or traditional occupation and use. Labour rights are respected including rights as specified in ILO Fundamental Principles and Rights at work. Portugal has ratified all 8 Fundamental ILO Conventions.</p> <p>According to the information available, this indicator is classified as low risk.</p>
Means of Verification	<p>Identity card of workers. Valid written contract Valid visa and residence working permit for foreigners outside EU, Iceland, Liechtenstein, Norway, Turkey, Brazil (with equality rights status), Cabo Verde, Guiné Bissau, São Tomé and Príncipe. Obligatory insurance document. Updated document of social security payment IRS /IRC taxes - Relatório Único.</p>
Evidence Reviewed	<ul style="list-style-type: none"> •Transparency International http://www.transparency.org/cpi2015#map-container •UN Sanctions List at:https://www.un.org/sc/suborg/en/sanctions/un-scconsolidated-list •World Bank: Worldwide Governance Indicators http://info.worldbank.org/governance/wgi/index.aspx#countryReports •Committee to Protect Journalists https://www.cpj.org/reports/2014/04/impunity-index-gettingaway-with-murder.php •Human Rights Watch: http://www.hrw.org/world-report/2015 •Global Witness: www.globalwitness.org Chatham House Illegal Logging Indicators Country Report Card http://www.illegal-logging.info •AmnestyInternational:https://www.amnesty.org/en/documents/pol10/0001/2015/en/ <p>Labour Code:</p> <ul style="list-style-type: none"> •Law No. 7/09 12/02 chap I and updates like Law 69/13, de 30/08 includes obligatory professional training (http://www.act.gov.pt/(ptPT)/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx) •Republic Assembly Resolution No.109/2012 de 08/08 art 6º (Convention 184 doesn't apply to industrial forest work) •ILO Convention numbers 87, 98, 29, 105, 100, 101,129 e 138, 184 (http://dre.pt/util/getpdf.asp?s=diad&serie=1&iddr=2012.153&iddip=20121525) •Foreign workers: Law n.º 23/2007 at 04/07 artº59º 5a) and updates (http://www.pgdlisboa.pt/Laws/Law_mostra_articulado.php?nid=920&tabela=Laws&so_miolo) •Labour Conditions Authority-ACT http://www.act.gov.pt/(pt-PT)/Paginas/default.aspx. •Ministry of Solidarity, Employment and Social Security http://www.portugal.gov.pt/pt/ministerios/mtsss.aspx •Employment and Professional Training Institute at https://www.iefp.pt/ •Ministry of Internal Administration http://www.portugal.gov.pt/pt/ministerios/mai/equipa.aspx Immigration And Borders Services http://www.sef.pt/portal/V10/EN/asp/page.aspx

	<ul style="list-style-type: none"> •SETAA-Sindicato da Agricultura, Alimentação e Florestas: at http://www.setaa.pt/ •UGT-União Geral de Trabalhadores at https://www.ugt.pt/ •CGTP - Confederação Geral de Trabalhadores Portugueses at http://www.cgtp.pt/ •ANEFA - Associação Nacional de Empresas Florestais, Agrícolas e do Ambiente at: http://www.anefa.pt/ •UNAC - União da Floresta Mediterrânica http://www.unac.pt/ •Forum Florestal- Estrutura Federativa da Floresta Portuguesa at http://forumflorestal.pt/ •Forestis- Associação Florestal de Portugal http://www.forestis.pt/ •FNAPF- Federação Nacional das Associações de Proprietários Florestais http://www.fnapf.pt/ •Confagri-Confederação Nacional das Cooperativas Agrícolas e do Crédito Agrícola de Portugal, CCRL at http://www.confagri.pt/ •CNA - Confederação Nacional de Agricultura at http://www.cna.pt/ •CAP- Confederação dos Agricultores de Portugal http://www.cap.pt/ •Transparency International http://www.transparency.org/cpi2015#map-container •UN Sanctions List at:https://www.un.org/sc/suborg/en/sanctions/un-sc-consolidated-list •World Bank: Worldwide Governance Indicators http://info.worldbank.org/governance/wgi/index.aspx#countryReports •Committee to Protect Journalists https://www.cpj.org/reports/2014/04/impunity-index-gettingaway-with-murder.php •Human Rights Watch: http://www.hrw.org/world-report/2015 •Global Witness: www.globalwitness.org Chatham House Illegal Logging Indicators Country Report Card http://www.illegal-logging.info •Amnesty International:https://www.amnesty.org/en/documents/pol10/0001/2015/en/
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

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

endemism (444 in total; 143 on the mainland, plus 76 from the Azores, 158 from Madeira, and 67 from Macaronesia), and 346 are endemic to the Iberian Peninsula. 3,314 species of flora are listed for the mainland, 1,006 in the Azores archipelago, and 1,233 in Madeira. This is the region that shelters the highest number of endemism (species that do not exist elsewhere) – 157 in all. In the Azores the number totals 78, while on the mainland it is 150.

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

- iv) **Critical areas of seasonal use:** including critical areas of refuge, breeding or migration routes in Portuguese territory: Fauna species may use different types of habitat depending on their life cycle and the season. These habitats can be critical for their importance in the reproductive season or for the availability of food in certain seasons. This designation focuses on the importance of these areas for fauna.

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

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

The vertebrate species identified as threatened are listed and described in the [Redbook of Vertebrates from Portugal](#). Similar assessment has been done for Bryophytes in the [Redbook of Bryophytes](#). A study aimed to identify and list the threatened flora is being developed at this moment.

HCV 2 – Landscape-level ecosystems and mosaics:

All Intact Forest Landscapes (IFL) as defined by the maps at <http://intactforests.org> shall be considered as HCV 2. The HCV2 shall identify intact forest landscapes and large landscape-level ecosystems and ecosystem mosaics that are significant at global, regional or national levels, and that contain viable populations of the great majority of the naturally occurring species in natural patterns of distribution and abundance.

Portugal does not have IFL. The only forest formation considered to be of regional relevance is:

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

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

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

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

ii) [Natura 2000 database](#)

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

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

In Portugal, HCV3 are the habitats listed in the Habitats Directive (Annex I) which, in the last national Habitats Directive report (2007–2012), were listed in categories (U1) – unfavourable, inadequate – and (U2) – unfavourable bad.

Natura2000's sectorial plan is the main source of information used to identify habitats in classified areas.

In the case of unclassified areas, the Habitats Directive implementation report can be consulted, in particular for information on the national distribution of natural habitats (information available only at 10x10km scale), their conservation status (favourable, unfavourable, inappropriate, unfavourable, unknown) and major threats.

<http://www2.icnf.pt/portal/pn/biodiversidade/rn2000/dir-avehabit/rel-nac/rel-nac-07-12>

In the case of a Forest Management Unit in protected areas, the Protected Area Spatial Plans will be the main source of information.

<http://www2.icnf.pt/portal/pn/biodiversidade/ordgest/poap/poap>

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

HCV 4 – Critical ecosystem services: basic ecosystem services in critical situations, including protection of water catchments and control of erosion of vulnerable soils and slopes.

In Portugal there are various important forest areas in terms of protection of river basins and soil conservation, areas included in REN (National Ecological Reserve) and PROFs (Regional Forest Management Plans), which are mapped and available at municipal level, can be useful tools which identify these critical areas.

REN aims to contribute to the sustainable occupation and use of the territory and its objectives are:

- Protect the water and soil natural resources and safeguard biophysical systems and processes associated with the coast and the terrestrial hydrological cycle by ensuring the environmental goods and services indispensable to the development of human activities.
- Prevent and reduce the effects of degradation of aquifer recharge, sea flood risks, floods, soil water erosion and streams mass movement, contributing to adaptation to the effects of climate change and safeguarding environmental sustainability and the safety of people and goods.

- To contribute to the connectivity and ecological coherence of the Fundamental Nature Conservation Network (RFCN) and to the achievement at national level of the priorities of the Territorial Agenda of the European Union in the areas of ecology and trans-European management of natural hazards.

The following typologies of REN areas are an important base information to identify HCV4:

- Coastal dunes and fossil dunes
- Cliffs and their protection ranges
- Coastal land cover
- Transitional waters and their respective beds, banks and protection strips.
- Water courses and their beds and banks
- Ponds and lakes and their protective beds, banks and ranges
- Reservoirs that contribute to the connectivity and ecological coherence of REN, as well as the respective beds, margins and protection bands
- Strategic areas of protection and recharge of aquifers.
- Adjacent zones
- Areas threatened by floods
- Areas of high risk of soil water erosion
- Areas of instability of slopes.

On the other hand, one of the PROF objectives is to define critical areas for fire risk, sensitivity to erosion and ecological, social and cultural importance, as well as the specific forestry and sustainable use of the resources to be applied to these areas.

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

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

i) World Heritage (UNESCO)

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

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

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

In Portugal there are specific governmental bodies to manage cultural heritage: the Directorate-General of Cultural Heritage for the Portuguese Mainland (<http://patrimoniocultural.pt/en/>); Directorate of Services of Cultural Heritage for the

	<p>Island of Madeira (http://cultura.madeira-edu.pt/agendacultural/CulturalHeritage/DSPC/tabid/939/language/en-US/Default.aspx); and the Regional Directorate of Culture for the Azores Islands (http://www.azores.gov.pt/Portal/en/entidades/srec-drcultura/?lang=en and http://www.iac-azores.org/).</p> <p>Among others, these bodies are responsible for: managing the architectural and archaeological built heritage in urban and rural areas, including conservation works in monuments under our care; managing the national museums, World Heritage monuments and museum collections; studying, researching, and disseminating heritage-related information; conserving and restoring movable heritage assets as well as researching, disseminating results, and raising awareness about heritage protection issues. Any intervention in the territory affecting listed cultural heritage and its protection areas requires prior approval by the competent authorities mentioned above. Any intervention in the territory of a known archaeological site shall be subject to preventive archaeological work which allows it to be preserved by scientific record.</p> <p>iii) Classified groves (Law No. 53/2012, dated 5th September)</p> <p>Additionally, the NRA WG has also looked at national legislation that identifies and protects outstanding grove (arboreta) (http://www.icnf.pt/portal/florestas/Arvores.qry?start:int=80&Distrito=&Concelho=&Freguesia=&Processo).</p> <p>The main source of information within this attribute is the application report of the Habitats Directive (2007-2012) as well as the description list of every habitat identified in Annex 1 of Habitats Directive in Sectorial Plan of the Natura2000 network. Other cartographic information of HCV is included on open GIS like http://www.habeas-med.org/webgis/pt_en/ and http://epic-webgis-portugal.isa.ulisboa.pt.</p> <p>Conclusion:</p> <p>HCV attributes are considered to be well identified and mapped within the area of assessment, considering the sources of information listed above, as well as data from voluntary forest certification schemes, namely FSC and PEFC. In this indicator one considers all the relevant findings of the FSC Controlled Wood National Risk Assessment from September 2018.</p>
<p>Means of Verification</p>	<p>Internet research GIS maps of HCV areas Interviews Priority Classified Habitat and species catalogue. Regional, publicly available data from a credible third party like FSC and PEFC reports</p>
<p>Evidence Reviewed</p>	<p>Law for natural values cadastre: Decree-Law No. 242/2015 of 15/10 https://dre.pt/application/conteudo/70693924 Bugalho, M. 2011 “Interpretação Nacional das Florestas de Alto Valor de Conservação” Documento de base Trabalhos realizados pelo GT IN FAVC do FSC Portugal HABEAS: http://www.habeas-med.org/webgis/pt_en/ LEAF_EPICWebGiSPortugal: http://epic-webgisportugal.isa.ulisboa.pt/maps/epic?format=image/png;%20mode=8bit&startExtent=-1523000,4400000,-143668,5180000 SNAC : Legislation https://dre.pt/application/file/70698029 RNAP: http://www.icnf.pt/portal/ap/ap Rede Natura 2000: http://www.icnf.pt/portal/naturaclas/rn2000 Important Bird Areas of Portugal at: http://ibas-terrestres.spea.pt/ - Site characterization SIC and ZPE: http://www.icnf.pt/portal/naturaclas/rn2000/p-</p>

	<p>set/Plan-setdocs</p> <p>Cartography: http://www.icnf.pt/portal/naturaclas/cart</p> <p>-Protected area plans: http://www.icnf.pt/portal/naturaclas/ordgest/poap</p> <p>-Data Base for fauna and flora specific plans: http://www.icnf.pt/portal/naturaclas/patrinatur/especies</p> <p>-Red book for Portuguese Vertebrates (2005): http://www.icnf.pt/portal/naturaclas/patrinatur/lvv</p> <p>- Nesting and wintering Bird Atlas on Portugal (2008): ND online Cartography (2015) http://webgis.spea.pt/AtlasAvesInvernantesMigradoras/</p> <p>- Reptile and amphibians of Portugal (2008): http://www.icnf.pt/portal/naturaclas/patrinatur/atlas-anfi-rept/anfibios</p> <p>- Fresh water Fish National cartography :http://www.cartapiscicola.org/#</p> <p>- Flora identification: http://www.icnf.pt/portal/naturaclas/rn2000/p-set/psrn-flora</p> <p>- Flora cartographic source: http://www.flora-on.pt/</p> <p>- National Conservation Plan of threatened Flora information http://www.icnf.pt/portal/naturaclas/patrinatur/conserv-flora-perigo</p> <p>http://naturdata.com/index.php?option=com_content&view=article&id=78&Itemid=60</p> <p>Electric wire line manual (ICNB 2008) :http://www.icnf.pt/portal/naturaclas/ordgest/aa/resource/doc/man-infra-lin</p> <p>Regional Forest Plans (PROF): http://www.icnf.pt/portal/florestas/profs</p> <p>AIIF :http://www.aiff.org.pt/assets/ESTUDO_Prospetivo_-_Sector-Florestal.pdf</p> <p>AIIF: http://www.aiff.org.pt/assets/Relatorio-de-Characterizacao-da-Fileira-Florestal-2014-160pCAPA-3-spread....pdf</p> <p>ICNF: http://www.icnf.pt/portal/florestas/ifn/resource/ficheiros/ifn/ifn6-res-prelimv1-1</p> <p>Forest management Plans of public areas: http://www.icnf.pt/portal/florestas/gf/pgf/publicitacoes/encerradas</p> <p>Autoridade Florestal Nacional, 2010, Florestat – Aplicação para a Consulta dos Resultados do 5º Inventário Florestal Nacional. Available on http://www.icnf.pt/portal/florestas/ifn/ifn5/florestat</p> <p>National Ecological Reserve https://dre.pt/application/dir/pdf1sdip/2012/11/21200/0630806346.pdf</p> <p>Sistema Nacional de Defesa da Floresta Contra Incêndios: https://dre.pt/application/dir/pdf1sdip/2006/06/123A00/45864599.pdf</p> <p>PANCD https://dre.pt/application/file/65985917</p> <p>PDR2020 http://www.pdr-2020.pt/site/O-PDR2020/Arquitetura/Area-3-Ambiente-Eficiencia-no-Uso-dos-Recursos-e-Clima/Medida-7-Agricultura-e-Recursos-Naturais/Acao-7.11-Investimentos-nao-produtivo/Operacao-7.11.1-Investimentos-nao-produtivo-Fundo-Florestal-Permanente:http://www.icnf.pt/portal/icnf/noticias/gloablnews/fundoflorestal-permanente-ffp</p> <p>Alves, A. M., Pereira, J. S., Correia, A. V., 2012. Silvicultura - A gestão dos ecossistemas florestais. Fundação Calouste Gulbenkian. ICNF http://www.icnf.pt/portal/florestas/aip/aip-monum-pt</p> <p>DRE: http://www.icnf.pt/portal/icnf/legisl/legislacao/2012/Law-n.o-53-2012-de-5-de-setembro.-d.-r.-n.o-172-serie-i</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.1.2	Threats to forests and other areas with high conservation values from forest management activities are identified and addressed.
Findings	Forest operations are identified in the National Report on the Implementation of Directive Habitats and Birds to present threat (present situation) in 6 habitats and pressure (future)

on 8 habitats accounting for 3.8% and 5%, respectively, of the total assessments. A similar assessment was performed, having species (except birds) as the scope and the numbers do not differ much. Forestry presents a threat to 7.7% of the species assessed and puts pressure on 9.6% of the total 426 species considered. To put it into perspective, agriculture shows a threat for 13.5% of habitats and 12% of species. Please refer to images below. Forest activities have a significant impact on bird attributes with 30% of the assessed species demonstrating to be threatened, as can be seen in the graphic dedicated to the subject (image 3).

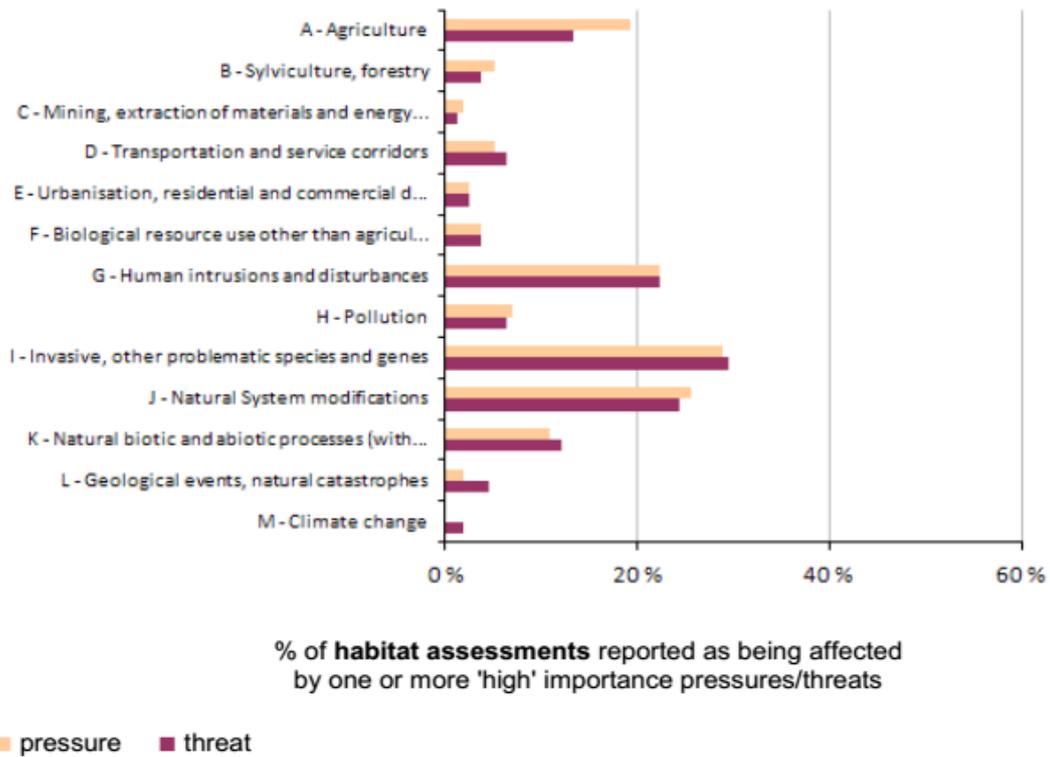
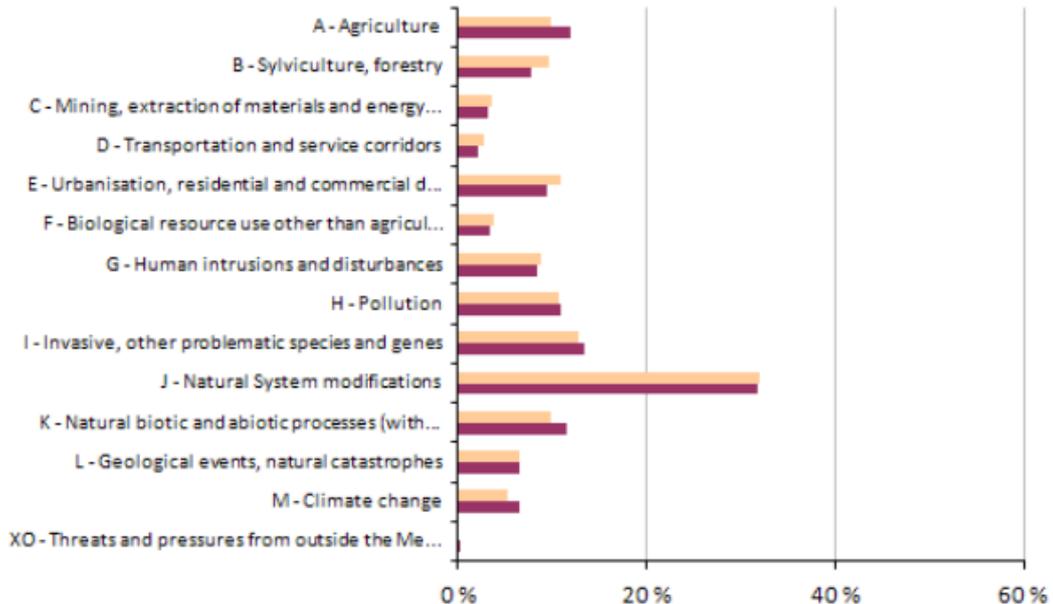


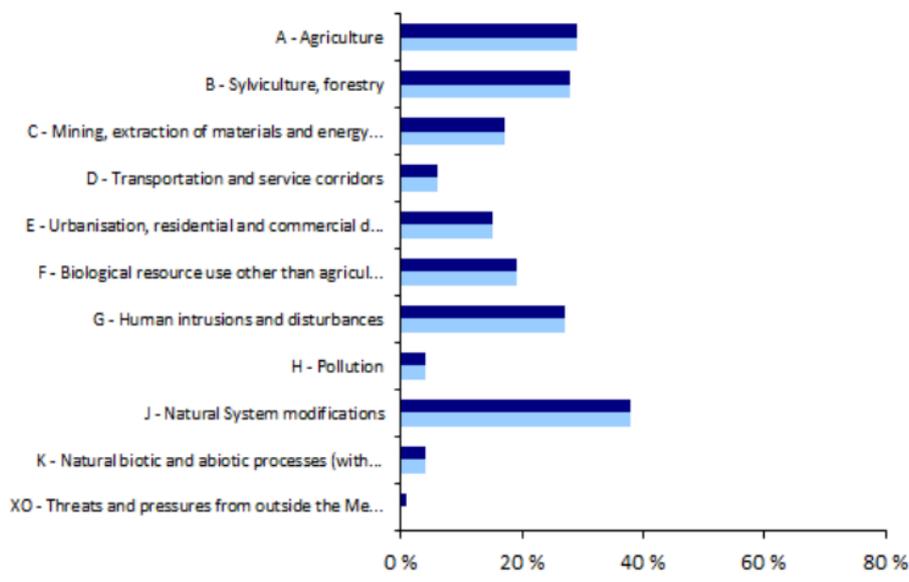
Image 1 Percentage of assessed habitats affected by one or more pressures/threats of high importance [1]



% of species assessments reported as being affected by one or more 'high' importance pressures/threats

■ pressure ■ threat

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



■ Any location ■ Within country

% of taxa suffering one or more 'high' impact pressure/threat

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

Forest owners make use of voluntary instruments, such as certification schemes recognized worldwide like Forest Stewardship Council (FSC) and Programme for the Endorsement of Forest Certification (PEFC), or they adopt practices in line with the "guidelines for sustainable forest management", based on the work of the Technical Committee for Standardization No. 145/IPQ (Portuguese Standard NP 4406/2003) which applies pan-European criteria for the sustainable forest management as well as

operational level guidelines. At present, more than 257 625 ha of forest were certified under PEFC scheme and 376 886 ha under FSC scheme. [1]

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

Abastena's Forest Management Group, http://abastena.pt/ggfa.php_with_national_scope_and_specific_helpdesks_across_the_country.

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

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

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

APFC: <http://www.apfc.pt/areas.php?aID=56> Mora, Vendas Novas, Benavente, Salvaterra de Magos, Almeirim, Chamusca e Ponte de Sôr

UNAC: <http://www.unac.pt/projetos/certificacao-florestal.html> Ribatejo and Alentejo regions

In Portugal, the bodies responsible for the inspection and surveillance are SEPNA and the Vigilantes da Natureza [Nature Rangers]. In some cases, the municipal authorities take responsibility for inspection themselves. At present, according to the rangers' association, there are around 119 rangers on the mainland, 33 in the Azores and 38 in Madeira; the APA – Agência Portuguesa do Ambiente (Portuguese Environment Agency) has 30 rangers and the CCDR - Comissões de Coordenação e Desenvolvimento Regional (Regional Commissions for Coordination and Development) 26. Each inspection is registered, though no annual reports have yet been identified.

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

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

Natural Park of São Mamede (PEPNSSM);

Natural Park of Arrábida (PEPNA);

Natural Park of Guadiana Valley (PEPNVG);

Natural Park of Tejo Internacional (PEPNTI);

Natural Park of Douro Internacional (PEPNDI);

Natural Park of Serra de Aire e Candeeiros (PEPNSAC);

Natural Park of Litoral Norte (PEPNLN);

Natural Park of Montesinho (PEPNM);

Natural Park of Sintra Cascais (PEPNSC);

Natural Park of Ria Formosa (PEPNRF);

Natural Park of Serra da Estrela (PEPNSE);

Risk conclusion:

HCV1 – Specified Risk

As described in the findings above, there are identified threats and pressures from forestry activities on species and birds. The specific species that might be affected by forestry activities are identified in the report of the application of the Birds and Habitats Directive

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

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

Furthermore, various good practice manuals, leaflets and other relevant information sources are available in the public domain, published by different institutions.

HCV 2 – Low risk

Montados of cork and holm oaks Landscape classified as HCV2 has potential threats that may cause the decline of montado (biotic and abiotic factors, lack of forest management), but the measures available to protect Montados are considered effective, resulting in an increase of 6% of the cork oak area from 1995 to 2010. [[National Forest Inventory 6, Preliminary results](#)]

Existing safeguarding measures include:

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

✓ a network of R&D (Research & Development) dedicated to defining and operationalizing good management practices.

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

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

This regulation is well established and promoted. It has been assimilated by the several agents involved such as owners, managers, and operators. The awareness of operators for planned forest management and the certification of sustainable forest management has been increasing in Portugal in recent years. Certified forest of cork and holm oak account for an estimated 236 000 ha.

Following several surveys on the conservation status of cork and holm oak stands, several actions have been developed in order to improve forest management practices, which were promoted by the entities involved. This includes a variety of contents and formats such as codes of good practices for cork oak forests but also pest and disease identification guides. More recent investment lines have been created supported by EU grants to assist owners and managers in pest monitoring of cork and holm oak stands (Operation 8.1.3 - Prevention of forest against biotic and abiotic agents) and for health recovery and restoration of forest stands of cork oak (Operation 8.1.4 - forest restoration affected by biotic and abiotic agents or catastrophic events).

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

HCV 3 – Specified risk

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

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

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

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

HCV 4 – Low risk

In Portugal there are several instruments related to the conservation of river basins, soil conservation, and protection against the risk of fire.

In the case of river basins, information relating to the classification of flood plains, areas threatened by floods and other relevant information can be partially obtained by consulting

	<p>areas included in the REN. River basin plans also contain information that may be relevant, as do PROFs, especially where they refer to protection forests.</p> <p>For information about erosion control it is essential to consult documentation relevant to the risk of erosion. Some of this information is contained in the REN, which identifies, on a scale of 1:25.000, areas at high risk of erosion, as well as zones of instability. Areas of high fire risk are identified in fire risk maps (ICNF) and in municipal forest fire plans.</p> <p>Within the national context, the structure of property, being extremely fragmented, reduces the dependence on ecosystem services and means this is not critical. Furthermore, the probability of forest management activities having a significant impact on the same service is negligible.</p> <p>Several legal instruments safeguard the functions of protection and regulate intervention in these areas. Examples of this are the Water Law [11], river basin plans (PBH) [12], public waters and dams planning (POAAP) [13], National Ecological Network [14], the Land law [15], etc.</p> <p>Not applicable, as no HCV4 is considered to exist at this scale.</p> <p>HCV 5 – Low risk</p> <p>Not applicable to Portugal.</p> <p>In Portugal, the use and enjoyment of common forest land is regulated (Lei dos Baldios [common land law] – Decree-Law No. 165/2015, 17th August). At present, this land is not indispensable to provide for the basic needs of the adjacent communities.</p> <p>HCV 6 – Low risk</p> <p>The criteria for identifying HCV 6 for Portugal are based on international or legal frameworks that already foresee the safeguards needed to protect/maintain the cultural values identified. At the same time, it is considered that the values are legally recognized and enforced.</p>
<p>Means of Verification</p>	<p>FSC or PEFC Forest management certificate public reports Forest Management plan as PGF, PUB, PEIF Game management plans Regional Forest Plans Forest Best Management Practices Forest Operating Procedures Records of BPs' field inspections and Environmental Impact Assessments Monitoring records Interviews with staff Publicly available information on the protection of the values identified Regional, publicly available data from credible third parties</p>
<p>Evidence Reviewed</p>	<p>[1] Birds (2008-2012) and Habitats (2007-2012) Directive Implementation Reports, http://www2.icnf.pt/portal/pn/biodiversidade/rn2000/dir-ave-habit [2] Decree-law No. 96/2013 https://dre.pt/application/file/a/497960 [3] Forest Producers Organizations: http://www.icnf.pt/portal/florestas/gf/opf/resource/doc/dcnf-c-list [4] Decree-law No. 151-B, October 31st http://www.icnf.pt/portal/icnf/legisl/legislacao/2013/Decree-law-n-o-151-b-2013-de-31-de-outubro-d-r-n-o-211-serie-i-2-o-suplemento [5] Regional Forest Planning (PROF) http://www.icnf.pt/portal/florestas/profs [6] Controlled Wood National Risk Assessment, 1st Draft, developed according to procedure FSC-PRO-60-002 V 3-0, 2016/10/13, https://ic.fsc.org/en/document-center/id/144 [7] Decree-Law 242/2015 of 15th October, https://dre.pt/application/conteudo/70693924</p>

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<http://www.icnf.pt/portal/naturaclas/patrinatur/lvv>
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<https://ic.fsc.org/en/document-center/id/59>
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- [12] Water Law Framework
<http://www.apambiente.pt/index.php?ref=16&subref=7&sub2ref=15&sub3ref=93#LawdaAgua>
- [13] River basins plans framework
<https://www.apambiente.pt/?ref=16&subref=7&sub2ref=9&sub3ref=834>
- [14] Public waters and dams planning
<https://www.apambiente.pt/index.php?ref=16&subref=7&sub2ref=10&sub3ref=96>
- [15] National Ecological Network
 North <http://www.ccdr-n.pt/servicos/ordenamento-territorio/reserva-ecologica-nacional>
 Centre
http://www.ccdr-n.pt/index.php?option=com_content&view=article&id=2926&Itemid=191
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 Alentejo <http://webb.ccdr-a.gov.pt/index.php/ord/ren>
 Algarve <https://www.ccdr-alg.pt/site/info/reserva-ecologica-nacional-ren>
- [16] Land Law framework
http://www.dgterritorio.pt/ordenamento_e_cidades/projetos_em_curso/reforma_do_quadro_legal_ot_u/Law_de_bases_da_politica_de_solos_de_ot___urbanismo/apresentacao/

Further documents reviewed:

http://cdr.eionet.europa.eu/Converters/run_conversion?file=pt/eu/art17/envuc2hfw/PT_habitats_reports.xml&conv=350&source=remote#92B0

Law for natural values cadastre: Decree-Law No. 242/2015 of 15/10
<https://dre.pt/application/conteudo/70693924>

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 LEAF_EPICWebGiSPortugal:
<http://epic-webgisportugal.isa.ulisboa.pt/maps/epic?format=image/png;%20mode=8bit&startExtent=-1523000,4400000,-143668,5180000>

SNAC : Legislation <https://dre.pt/application/file/70698029>

RNAP: <http://www.icnf.pt/portal/ap/ap>

Rede Natura 2000: <http://www.icnf.pt/portal/naturaclas/rn2000>

Important Bird Areas of Portugal at: <http://ibas-terrestres.spea.pt/>

Site characterization SIC and ZPE: <http://www.icnf.pt/portal/naturaclas/rn2000/p-set/Plan-setdocs>

Cartography: <http://www.icnf.pt/portal/naturaclas/cart>

Protected area plans (POAP): <http://www.icnf.pt/portal/naturaclas/ordgest/poap>

Data Base for fauna and flora specific plans:
<http://www.icnf.pt/portal/naturaclas/patrinatur/especies>

Red book for Portuguese Vertebrates (2005):
<http://www.icnf.pt/portal/naturaclas/patrinatur/lvv>

Nesting and wintering Bird Atlas on Portugal (2008): ND online
 Cartography (2015) <http://webgis.spea.pt/AtlasAvesInvernantesMigradoras/>

Reptile and amphibians of Portugal (2008):
<http://www.icnf.pt/portal/naturaclas/patrinatur/atlas-anfi-rept/anfibios>

Fresh water Fish National cartography :<http://www.cartapiscicola.org/#>

Flora identification: <http://www.icnf.pt/portal/naturaclas/rn2000/p-set/psrn-flora>

Flora cartographic source: <http://www.flora-on.pt/>
 National Conservation Plan of threatened Flora information
<http://www.icnf.pt/portal/naturaclas/patrinatur/conserv-flora-perigo>
http://naturdata.com/index.php?option=com_content&view=article&id=78&Itemid=60
 Electric wire line manual (ICNB 2008)
<http://www.icnf.pt/portal/naturaclas/ordgest/aa/resource/doc/man-infra-lin>
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 AIIF :http://www.aiff.org.pt/assets/ESTUDO_Prospetivo_-_Sector-Florestal.pdf
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 Resultados do 5º Inventário Florestal Nacional. Disponível em
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 Reserva Ecológica Nacional
<https://dre.pt/application/dir/pdf1sdip/2012/11/21200/0630806346.pdf>
 Sistema Nacional de Defesa da Floresta Contra Incêndios:
<https://dre.pt/application/dir/pdf1sdip/2006/06/123A00/45864599.pdf>
 PANCD <https://dre.pt/application/file/65985917>
 PDR2020 <http://www.pdr-2020.pt/site/O-PDR2020/Arquitetura/Area-3-Ambiente-Eficiencia-noUso-dos-Recursos-e-Clima/Medida-7-Agricultura-e-Recursos-Naturais/Acao-7.11-Investimentosnao-produtivos/Operacao-7.11.1-Investimentos-nao-produtivos>
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 Alves, A. M., Pereira, J. S., Correia, A. V., 2012. Silvicultura - A gestão dos ecossistemas florestais, Fundação Calouste Gulbenkian.
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Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
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	Indicator
2.1.3	Feedstock is not sourced from forests converted to production plantation forest or non-forest lands after January 2008.
Finding	<p>The Portuguese forest is defined by its recent origins and by heavy human intervention. In general, the Portuguese forest is recent. In Europe, Portugal is the country in which the transition from deforestation to reforestation occurred most rapidly: forest covered 4 to 7 percent of the mainland in 1870 and increase to cover more than 30 per cent in less than 100 years. [1]</p> <p>For the purpose of this document and specifically for this indicator, the concept of “forest” will be described by the definition of “natural forest” from the FSC forest management standard for Portugal (approved by FSC on 18th February 2016):</p> <p>“forest areas where many of the principal characteristics and key elements of natural ecosystems such as complexity, structure, soil properties, and biodiversity are present, and where all or most of the trees are indigenous. Natural forests can include forest areas where forestry or other interventions occur, coming from a combination of natural regeneration and artificial regeneration, composed by local indigenous species in which many of the characteristics of natural forests are present. Natural forests do not include:</p> <ol style="list-style-type: none"> i. Areas where the vegetation is not dominated by trees; ii. Areas that were not previously forested; iii. Areas that do not yet contain many of the characteristics and elements of native ecosystems.” <p>FSC forest management standard for Portugal will also be used for the definition of “plantation”:</p> <p>“Forested area resulting from plantation or sowing, with the objective to produce timber or non-timber products, that can be composed by indigenous and non-indigenous species and include one or more of the following characteristics:</p> <ul style="list-style-type: none"> - Reduced number of species - Intensive forestry - Regular plant spacing - Regular settlements” <p>FAO’s Global Forest Resources Assessment of 2010 [2] shows the following data regarding the Portuguese forest area:</p> <p>Primary forest: 0.8%</p> <p>Forest with the primary designated function of production: 59%</p> <p>Forest within protected areas 20%</p> <p>Planted forest 25%</p> <p>It is possible to assume that the remaining forest ecosystems comprising primary forests are protected under the Fundamental Nature Conservation Network (RFCN) (defined by Decree-Law No. 142/2008, amended by Decree-Law No. 242/2015, 15th October) which led to establish the Sistema Nacional de Áreas Classificadas [National Classified Areas System], which comprises the major areas of environmental conservation and biodiversity: i) RNAP; ii) SICs and ZPEs of the Natura2000 network; iii) any other areas classified under the umbrella of international</p>

commitments agreed upon by the Portuguese state; and areas of continuity: i) REN; ii) RAN iii) DPH (public hydric domains), safeguarded by the respective legal regulations.

Furthermore, the overall dynamics of the Portuguese forest cover is not promoted or supported by the demand of biomass. Simultaneously, the development of forest energy crops is not permitted in Portugal, through several legislation limitations, namely the mandatory previous authorization for premature final cutting of eucalyptus and Pinus Pinaster settlements (Decree-Law No.173/88 from May 17th), regulations for the introduction and environmental control of non-indigenous species (Decree-Law No. 565/99 from December 21st) and mainly the mandatory previous authorization for afforestation and reforestation activities using short rotation crops (Decree-Law No.175/88 from May 17th).

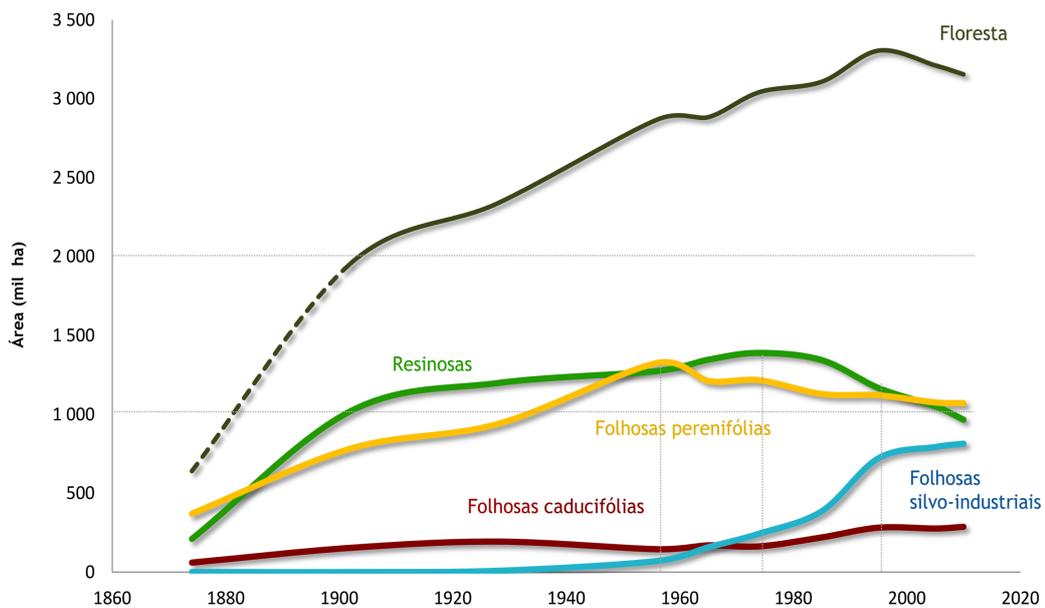


Figure 2 Historic evolution of the Portuguese forest cover 1874-2010 [José Uva, ICNF]

Through the analysis of the graph above, it is possible to verify that the increase in forested area, from 1880 to 1960 was supported by afforestation activities using coniferous species (green line, mainly Pinus Pinaster) and deciduous species (yellow line, several species of oaks). The majority of these forested areas do not possess the characteristics of natural forests and are used, mainly, for productive purposes of both timber products and non-timber products. The increase verified over the Eucalyptus area from 1960 till the present date followed the same objectives as the previous afforestation activities: timber production for industrial purposes. Thereby, the most common change of dominant species in forested areas, from Pinus Pinaster to Eucalyptus, can be considered as a change from one wood production plantation to another wood production plantation and not a conversion from natural forest to production plantation, since most of the Pinus Pinaster settlements don't fit under the definition of natural forest.

It is also valid to point out that the decrease in the area of Pinus Pinaster verified in the period between 1985 and 2010 is justified by:

- 1) the conversion to groves and pastures: 74%
- 2) the conversion to Eucalyptus areas: 26%

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

Considering the change of dominant species in forest areas, the provisions of Decree-Law No. 96/2013, July 19th are applied to Portugal's mainland. This establishes the legal framework, for afforestation and reforestation actions (RJAAR - Legal Framework for Arborisation and Reforestation Actions). Any afforestation/reforestation, independently of the area of intervention, that alters the dominant species previously installed is subject to previous authorization by the ICNF.

It's important to highlight that article No.9 of RJAAR defines that if an intervention occurs inside the National Ecologic Reserve, a consultation must be performed at the relevant CCDR and municipality. Article No.10 defines the factors that should be taken into account in the decision-making process including the protection of forest against forest fires, hydric related issues, biodiversity and habitat protection, amongst others.

[Law No. 77/2017 August 17th](#), reviews the RJAAR, capping the expansion of eucalyptus area in Portugal. Reforestation actions using eucalyptus can only be done in the following cases:

- 1) In areas where the previous dominant species was Eucalyptus;
- 2) As compensation of areas with Eucalyptus settlements that were relocated to more productive sites.

There is also specific legislation comprising the protection of:

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

Law enforcement:

The latest RJAAR informative report [3] summarizes the relevant statistical data about the application of this legal framework:

16% of the reforestation activities comprising the change of species, in the period of the assessment, consisted of Pinus Pinaster converted to Eucalyptus. 4% of the referenced activities comprise the plantation of Eucalyptus in areas occupied by other, non-specified, species.

Tipo de rearborizações		Autorizações (ha)	Comunicações (ha)	Total	
				(ha)	%
Sem alteração de espécie	eucalipto-comum	30.586	5.087	35.674	64
	pinheiro-bravo	455	161	616	1
	outras	0	0	0	0
Com alteração de espécie*	pinheiro-bravo em eucalipto-comum	8.535	417	8.952	16
	outras espécies em eucalipto-comum	1.851	302	2.153	4
	pinheiro-bravo em outra espécies	2.224	195	2.419	4
	eucalipto-comum em outra espécies	3.162	336	3.498	6
	outras	1915	361	2.276	4
TOTAL		48.728	6.859	55.587	100

	<p>Image 3 Afforestation and Reforestation actions authorized or validated by ICNF from October 2013 to December 2017 [source: ICNF]</p> <p>This informative note also demonstrates that this law is being actively applied, with 2,091 civil proceedings since 2013. The lack of either previous formal authorization or previous communication for afforestation and reforestation activities is the most common non-conformity with 88% of the total cases.</p> <p>Conclusions:</p> <ul style="list-style-type: none"> - Portugal has a very small area that fits under the definition of Natural forest. - The majority of the settlements of Pinus Pinaster, Eucalyptus, Pinus Pinea and even Quercus Suber are originated from afforestation activities for timber production and non-timber products and, thereby, are not considered as natural forest. - Conversion of forest cover is possible in Portugal, although previous authorization by ICNF is mandatory. - Specific tree species are protected and can only be cut with previous authorization from ICNF. - Several legal mechanisms and monitoring practices are put in place in order to control forestry activities in sensitive areas. <p>Considering the information above, the risk is considered as low for this indicator.</p>
<p>Means of Verification</p>	<p>Historical maps and enquiries with stakeholders</p> <p>Regional, publicly available data from a credible third party</p> <p>Records of BPs' field inspections</p> <p>Monitoring records</p> <p>Aerial photos</p>
<p>Evidence Reviewed</p>	<p>[1] Pereira, João et al. (2009). Floresta. In: Pereira, H. M., Domingos, T., Proença, V., Vicente, L. & Rodrigues, P. (eds.) Ecosistemas e Bem-Estar Humano. Avaliação para Portugal do Millennium Ecosystem Assessment [Ecosystems and human well-being. Evaluation of the Millennium Ecosystem Assessment for Portugal]</p> <p>[2] Global Forest Resources Assessment 2010, FAO, Rome, 2010</p> <p>[3] RJAAR Informative note No. 8, ICNF, http://www2.icnf.pt/portal/florestas/arboriz/resource/docs/not-info/RJAAR-Nota-Informativa-n8.pdf</p> <p>[4] 6.º INVENTÁRIO FLORESTAL NACIONAL</p> <p>Legal Framework for Afforestation and reforestation activities (RJAAR), DL 96/2013, July 19th, http://www.icnf.pt/portal/florestas/arboriz/leg-reg</p> <p>Premature cutting of forest settlements: Law-decree No.173/88 from May 17th</p> <p>Conversion from natural Quercus suber and Quercus rotundifolia to other land uses: DL 169/2001, de 25/05 Artº 2º https://dre.pt/application/dir/pdf1sdip/2001/05/121A00/30533059.pdf updated by DL155/2004, 30/06 https://dre.pt/application/dir/pdf1sdip/2004/06/152A00/39673968.pdf</p>

	<p>Conversion inside Protected and Classified areas: DL142/2008 of 24/07 Artº 43º https://dre.pt/application/dir/pdf1sdip/2008/07/14200/0459604611.PDF</p> <p>DL 49/05 24/02 https://dre.pt/application/dir/pdf1sdip/2005/02/039A00/16701708.pdf</p> <p>Destruction of natural riparian vegetation: Law 58/2005 29/12; Law 54/2005, of 15/11 (Artº 25º) https://dre.pt/application/dir/pdf1sdip/2005/11/219A00/65206525.pdf</p> <p>Conversion from natural Ilex aquifolium DL423/89, 4/12 (Artº 1) https://dre.pt/application/dir/pdf1sdip/1989/12/27800/52915292.pdf</p> <p>Conversion from natural landscapes and hillside/slope erosion: DL 139/89 28/04 artº1 http://www.icnf.pt/portal/icnf/faqs/arbordl139-89</p> <p>Conversion by deforestation above 50ha (10ha in Sensitive Areas) or for reforestation with fast growth forest species on areas above 350ha (or 70 ha in sensitive areas) DL 151-B/2013 Artº 1º https://dre.pt/application/dir/pdf1sdip/2013/10/21102/0000600031.pdf</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.2.1	Feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them.
Finding	<p>The Portuguese Legal system defines a forest management and planning framework which includes three levels:</p> <p>I) Regional Forest Plans (PROF) are instruments of sectorial policies for regional level. PROF set general guidelines for intervention, use and forest exploration with the goal to promote and guarantee the sustainable production of all products and services, preserving the objectives of National Forest Strategy (ENF). PROF are binding for administrative authorities, at all levels. PROF are, at the moment, under revision and from the proposed documents put under public consultation it was possible to verify a general decrease in the minimum area threshold for the obligation to have an approved PGF. Moreover, PROF will define the maximum threshold for continuous cutting and single species regular settlements.</p> <p>II) Forest Management Plans (PGF) are tools for the management of forest areas at forest unit/exploration level, following the guidelines set by the applicable Regional Forest Plan. PGF set, in time and space, the nature of concrete interventions and exploration of the existing resources in the forest unit, aiming for the sustainable production of products and services, considering the activities and uses of the surrounding areas, as well as the existing restrictions of legal and binding character.</p> <p>III) Specific Plans for Forest Intervention (PEIF) are instruments that produce specific measures for the intervention in forest areas with major biotic problems (e.g.: invasive species, plagues or diseases) or abiotic (e.g.: high risk of forest fire).</p>

PGF is mandatory for all public managed forests:

Every community forest area (Baldio) must have an approved PGF (or PUB – Community areas use Plan), independently of its dimension. PGF and PUB are prepared by the public body responsible for the management of the public forest unit and it is assessed by ICNF.

PGF is mandatory for private forest areas in the following cases:

- a) A defined size of the forest management unit is achieved. The area is set in the applicable PROF as 25, 50 or 100ha, depending on the region.
- b) areas integrated in ZIF (Forest Intervention Zones) in conformity with the dispositions of Decree-law No. 127/2005, from August 5th, in the wording of Decree-laws 15/2009 from January 14th, 2/2011 from January 6th and 27/2014 from February 18th. In this case, the general PGF of the ZIF is adopted or a specific PGF must be prepared.
- c) a public funding is conceded (European, national or other, e.g.: Proder program) for forest management or afforestation. This obligation was in force until February 2014. From there onwards, the requirement described in a) is applicable, whether there is a public funding, or not.

For private forests, the PGF is prepared by the entity responsible for the forest management and submitted to ICNF for approval.

Within SNAC [National System of Classified Areas]:

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

General cases:

When forest owners are not obliged to develop and submit a PGF, the applicable PROF, PSRN2000 and several good practices handbooks supply general guidance. The objective of these documents is to support forest owners, managers and planners on the preparation and implementation of forest projects and operations, aiming to ensure their compatibility with the existing natural values and even contribute towards the improvement of their conservation status.

Additionally, there is applicable national legislation which includes specific operational rules of mandatory character, related to species and habitats protection [see 2.1.2], soil and water resources protection [[PGRH](#), [PGBH](#), [REN](#), etc.], forest fires prevention, and other instruments also described in indicators 2.1.2, 2.2.2, 2.2.6. Municipal Planning documents contain mandatory rules that must be observed.

Decree-law No.151-B/2013 [4] Defines the obligation to perform an Environmental Impact Assessment (AIA) on every afforestation and reforestation occurring in areas greater than 350ha (70ha in sensitive areas) or greater than 140ha (30ha in sensitive areas) if the subject area, in conjunction with pre-existent forest stands of the same species, separated by less than 1 km, would produce a continuous forested area of more than 350ha (70ha in sensitive areas). It also establishes that an AIA must be called when there is a deforestation action on areas greater than

50ha (10ha in sensitive areas). PROF, in several regions (Alto Minho, Baixo Minho, Barroso e Padrela, Nordeste Transmontano), also define a maximum threshold for clear cutting of 10ha. [5]

Decree-law No. 96/2013 (RJAAR) [2] states that afforestation and reforestation actions above 2ha must be preceded by an authorization from ICNF (article No.4). Some exceptions to the above are possible, but constraints are defined in article 5 of this Decree-law. It is important to highlight that there is no exception for previous authorization when the area in question is located totally or partially inside SNAC.

Article No.9 of RJAAR defines that if an intervention area is situated inside the National Ecologic Reserve, a consultation must be addressed to the CCDR as well as the related municipality. Article No.10 defines the factors that should be taken into account in the decision-making process including protection of forest against forest fires, hydric related issues, biodiversity and habitat protection, among others.

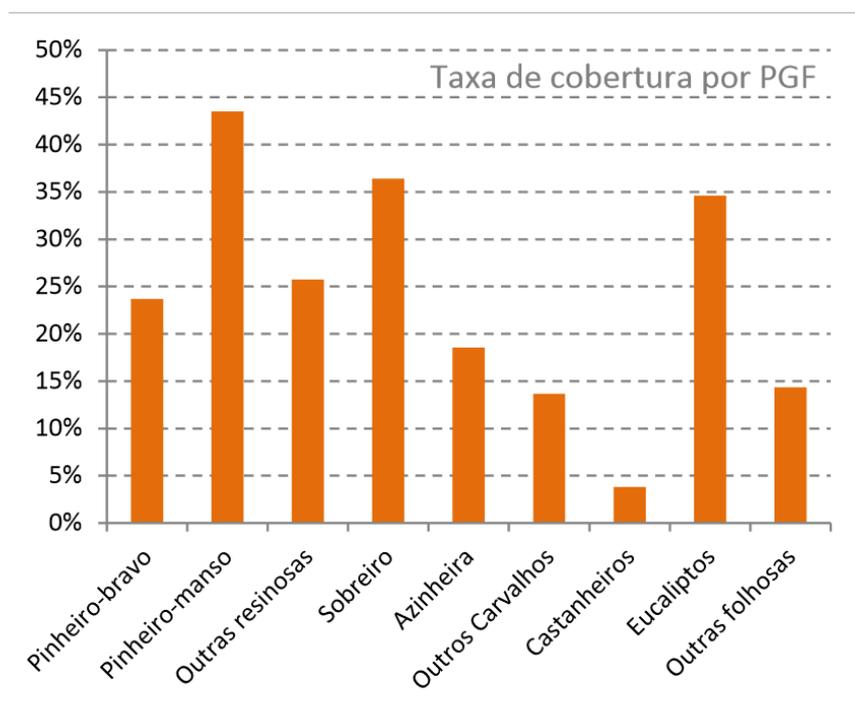
In the case of river basins, information relating to the classification of flood plains, areas threatened by floods and other relevant information can be partially obtained by consulting areas included in the National Ecologic Reserve (REN). River basin plans (PGBH) also contain relevant information,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

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

Status of the implementation of Forest Management Plan [PGF in PT]:

Data from 2013 show that approved FMPs cover 44% of the forested area in Portugal with 1 522 195 hectares covered. [AIFF]

The graph below shows the FMP [PGF] coverage over the main tree species in Portugal. An FMP is applied on 45% of the Pinus Pinea area, 35% of the eucalyptus area, and 25% of the Pinus Pinaster area. (source)



	<p>In the National Strategy for Forests – revision of 2015, one defined an objective in which 100% of the forest area managed by ICNF shall have an approved PGF by 2017.</p> <p>In the case of community managed forests (Baldios) an approved PUB (specific FMP for this type of management) is in place on 60% of the total area.</p> <p>Around 25% of the areas with PGF are encompassed in the National System of Classified Areas – SNAC – which consists of Protected Areas (AP), Natura 2000 network sites, Biosphere Reserves, Ramsar sites, among others and, thereby, a Biodiversity Management Plan must be prepared.</p> <p>From October 2010 to April 2013, approved PGF areas increased from 386 300 hectares to 1 522 195 hectares.</p> <p>This exponential growth of the area covered by an approved PGF, in the period between 2010 and 2013, is a clear example of the raising awareness on the importance of a responsible forest management. Updated information is not yet available, but it is considered reasonable to expect that the area under an approved PGF has increased since 2013.</p> <p>Finally, during the revision process of the Regional Forest Plans [PROF] which started in 2017, several drafts for specific regions were put to public consultation, enabling the identification of a common trend consisting of the reduction of the minimum area threshold to enforce the need to have an approved PGF and also the establishment of a maximum area threshold for continuous clear cuts and afforestation with some species.</p> <p>Risk Conclusion:</p> <p>Despite the described dispositions presenting a mandatory requirement in several cases, there is a possibility of wood to come from a forest area where no forest management plan or a similar management instrument is in place, however some considerations shall be made regarding the current situation and future trends:</p> <ul style="list-style-type: none"> ○ This possibility is temporary, as the number of approved management plans has increased significantly in the past decade; ○ Such risks have a limited impact on forest resources as they are not directly related to forest harvesting; ○ There is national legislation that includes several specific mandatory operational rules comprising the protection of species, protection of soil, or the prevention of forest fires as well as municipal and other land use plans that have to be taken into account. <p><u>Specified risk is considered for areas without approved FMP.</u></p>
<p>Means of Verification</p>	<p>Approved EIA when applicable.</p> <p>Approved Forest Management Plan when applicable</p> <p>SNAC framework</p> <p>Records of oil and hazardous chemicals deliveries.</p> <p>Manifest</p> <p>Records of BPs' field inspections</p> <p>Monitoring records</p>

	Regional Forest Plan
Evidence Reviewed	<p>National Strategy for Forests revision in 2015: https://dre.pt/application/file/66432612</p> <p>Forestry Good Practices Handbook: http://www2.icnf.pt/portal/florestas/gf/documentos-tecnicos/resource/doc/Boas-Praticas-Florestais.pdf</p> <p>Operational Planning and Good Practices for Logging Actions: http://www2.icnf.pt/portal/agir/boapratic/resource/doc/exp-flor/plan-op-b-prat-exp-flor</p> <p>Public authority sources</p> <ul style="list-style-type: none"> • Instituto da Conservação da Natureza e Florestas at http://www.icnf.pt/portal • APA-Agência Portuguesa do Ambiente at http://apambiente.pt/index.php • Municipalities at (<a href="http://www.cm-<NAME>.pt/">http://www.cm-<NAME>.pt/) <p>Legislation:</p> <p>National Ecological Reserve</p> <ul style="list-style-type: none"> • DL 239/12 at 2/11 artº20ºNo.1 e) EIA •DL 151-B/2013 de 31/10 artº 1º No.3 b) Anexo II, amended by DL n.º 47/2014 from March 24th and DL 179/2015, from August 27th. https://dre.pt/application/dir/pdf1sdip/2013/10/21102/0000600031.pdf <p>DL No. 47/2014, 24/03 31/10 DL No. 179/2015, 27/08 artº2º</p> <ul style="list-style-type: none"> • Lei Ambiental de Bases de Política do Ambiente: Law No. 19/14 of 14/04 artº10ºd) DL No.49/05, of 24/02 artº20º • DL 197/2005, of 8/11 artº 1º, No.3 b) e No.4 <p>Forest fire areas:</p> <ul style="list-style-type: none"> •DL No.55/2007, of 12/03 artº1º •Law No. 54/91, of 8/08 •DL No.34/99, of 5/02 artº1º •Ministry Council Resolution No. 5/2006, of 18/01
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.2.2	Feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b).
Finding	<p>National Forest Strategy (2015) [4] states (chapter 2.2.5): “The susceptibility to desertification, which in terms of the Convention is defined by the aridity index threshold and, in particular in Portugal, corresponds to the 'Semi-arid' and 'dry sub-humid' classes, covers 58% of the mainland in the last three decades (1980/2010) and 63% in the last decade (2000/2010) (below). More than 60% of the national forest area estimated by IFN6 is included in areas susceptible to desertification including 100% of holm oak area, 99% of the area of cork oak, 98% of Pinus Pinea and 100% of the carob tree.</p> <p>Still from the same chapter of the National Forest Strategy: “It should also be noted that in the last decade there has been a significantly positive trend on the recovery of the productive capacity of Portuguese soils – in 22% of the mainland area– thus a regression in the desertification trends, including, in this scope, 5% of degraded areas, 9% of areas under production and 6% of naturalized areas, on a large extent related to new afforestation, since more than 90% of new afforestation interventions were carried out in areas susceptible to desertification (data from IFN5).”</p> <p>Holm oak, cork oak and stone pine settlements comprise trees with different ages and sizes which represent a major asset for the control of erosion, mainly in the southern region of Portugal. Since these tree species aren't used primarily for timber production, their continuous maintenance until decay being even common, added to the fact that the areas of stone pine and cork oak are increasing in Portugal, a positive trend to control soil degradation is visible. Interventions in settlements of these species occur on a relatively long time frame and, therefore, plants play an important role on controlling soil erosion.</p>

**Suscetibilidade
à
Desertificação
(Índice de Aridez
1980 / 2010)**

Legenda

-  Areas não suscetíveis
-  Areas suscetíveis



Figure 3 Soil susceptibility to desertification [PANCD 2014-2020] [9] ICNF report “Forest adaptation to climate change” (2013) [5] prior to the development of the National Forest Strategy of 2015 states the following on page 57:

“Technical studies for the assessment and monitoring of the soil status that have been developed as a support for the revision of the PANCD (National Action Plan Against Desertification), show that 28% of the areas susceptible to desertification are degraded. Nevertheless, monitoring of the soil conditions over the period 2000-2010 shown a positive evolution of soil status on susceptible areas – 22% recovered its primary productivity and only 1.1% presented a negative trend.”

Madeira, M., in its study [6], based on 30 years of monitoring, sampling and analysing activities that “forest residues could be used in energy production, since the site (soil) presents sufficient resilience to nutrient removal...”. In the other two referenced studies [7][8], direct relationship between biomass removal and degradation of soil quality is not achieved. Both authors put it as a hypothesis, lacking a longer-term assessment, as Madeira, M. did as a result of its 30 years study.

Law No. 31/2014 [1], May 30th, defines the general basis for the public policy on soils, territory planning and urbanism and sets a goal of enhancing the potential of agricultural, forestry and forest areas, among other broader objectives. It sets, as the objective of territory planning:

“The preservation of soils with potential for agriculture, livestock or forestry, nature conservation, tourism and leisure, the production of renewable energies or the exploitation of geological resources in such a way that the allocation of such soils

	<p>to other uses is restricted to situations where it is effectively needed and is duly proven”</p> <p>Law No.33/96, August 17th – Base Law for Forest Policy determines that the national forestry policy pursues the objective of "... ensuring the fundamental role of forests in regulating <u>water resources, soil conservation</u> and air quality and combating desertification ...".</p> <p>Forest Regime [3], established in 1901 also defines “For the sake of the public, the forest regime shall be subordinated not only to lands which must be destined for the creation, exploitation and conservation of forest wealth, from the point of view of the national economy, but also those for which the afforestation is necessary for the good conservation of waters and safeguard of the várzeas [floodplains], as well as for the valorisation of ridges, moorlands and arid plains and benefit of the climate, or for the <u>fixation and conservation of the soil</u>, in the mountains, and the sands, in the maritime coast.” Under Forest Regime, there are several areas, public and private, that have been subject of interventions in the past century and are still maintained due to their importance regarding the objectives established in the original document. The following link shares a map of these areas: http://www.icnf.pt/portal/florestas/gf/regflo/resource/img/map-mnac-per-flor</p> <p>Considering the information reviewed and despite the positive trends verified in the latest assessments on soil quality, the risk evaluation for this indicator is assessed as <u>specified</u>.</p>
Means of Verification	<p>Best Management Practices; Records of BP’s field inspections; Assessment at operational level of measures designed to minimise impacts on the values identified Level of enforcement Regional, publicly available data from a credible third party Erosion and desertification programs and maps Approved RJJAR Approved Forest Management Plan</p>
Evidence Reviewed	<p>[1] https://dre.pt/application/dir/pdf1sdip/2014/05/10400/0298803003.pdf [2] http://www.bolsanacionaldeterras.pt/docbt/Lei_n62_2012_BolsadeTerras.pdf [3] http://www.icnf.pt/portal/florestas/gf/regflo [4] https://dre.pt/application/file/66432612 [5] Adaptation of forests to climate change, ICNF, 2013 http://www.icnf.pt/portal/florestas/ppf/resource/docs/alt-clima/rel-florest-enaac [6] Madeira, M. (2015) Thirty years of research on soil quality in forest systems under Mediterranean conditions. Trends and future. http://www.repository.utl.pt/bitstream/10400.5/9277/1/REP-M.Madeira Spanish%20j.S.C..pdf [7] Madeira.M , Fabião A., Páscoa F., Magalhães M., Cameira,M , Ribeiro C. (2009) Carbon and nutrient amounts in aboveground biomass, understory and soil in a pine stand chronosequence, http://www.scielo.mec.pt/pdf/rca/v32n2/v32n2a15.pdf [8] Magalhães, M., Cameira M., Pato, Santos R. & Bandeira, J (2011) Residual forest biomass: effects of removal on soil quality http://www.scielo.mec.pt/scielo.php?script=sci_arttext&pid=S0871-018X2011000200019 [9] National Plan to Combat Desertification http://www2.icnf.pt/portal/pn/biodiversidade/ei/unccd-PT/pancd</p>

Risk Rating	<input type="checkbox"/> Low Risk	<input checked="" type="checkbox"/> Specified Risk	<input type="checkbox"/> Unspecified Risk at RA
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	Indicator																																								
2.2.3	Key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).																																								
Finding	<p>Most important forest areas with high concentration of nature conservation values have been identified and designated as classified or protected areas at national and/or EU level (Natura 2000 sites) as described in indicator 2.1.1 and 2.1.2.</p> <p>National summary of the implementation of the Habitats Directive (2007-2012) provides the graphs below, showing the comparison between the conservation status of habitats within the timeframe of the last two Habitats directive reports, 2001 to 2006 and 2007 to 2012.</p> <p>Habitats</p> <table border="1"> <caption>Conservation status of habitats in biogeographical and marine regions</caption> <thead> <tr> <th>Habitat Category</th> <th>Number of Assessments</th> <th>2001-2006 (Narrow Bar)</th> <th>2007-2012 (Wide Bar)</th> </tr> </thead> <tbody> <tr> <td>Forests</td> <td>25</td> <td>~15% Favourable, ~5% Unknown, ~80% Unfavourable</td> <td>~25% Favourable, ~5% Unknown, ~70% Unfavourable</td> </tr> <tr> <td>Rocky habitats</td> <td>15</td> <td>~55% Favourable, ~5% Unknown, ~40% Unfavourable</td> <td>~65% Favourable, ~5% Unknown, ~30% Unfavourable</td> </tr> <tr> <td>Bogs, mires & fens</td> <td>8</td> <td>~15% Favourable, ~5% Unknown, ~80% Unfavourable</td> <td>~25% Favourable, ~5% Unknown, ~70% Unfavourable</td> </tr> <tr> <td>Grasslands</td> <td>16</td> <td>~25% Favourable, ~5% Unknown, ~70% Unfavourable</td> <td>~45% Favourable, ~5% Unknown, ~50% Unfavourable</td> </tr> <tr> <td>Sclerophyllous scrubs</td> <td>10</td> <td>~50% Favourable, ~5% Unknown, ~45% Unfavourable</td> <td>~40% Favourable, ~5% Unknown, ~55% Unfavourable</td> </tr> <tr> <td>Heath & scrub</td> <td>10</td> <td>~60% Favourable, ~5% Unknown, ~35% Unfavourable</td> <td>~50% Favourable, ~5% Unknown, ~45% Unfavourable</td> </tr> <tr> <td>Freshwater habitats</td> <td>20</td> <td>~40% Favourable, ~10% Unknown, ~50% Unfavourable</td> <td>~40% Favourable, ~10% Unknown, ~50% Unfavourable</td> </tr> <tr> <td>Dunes habitats</td> <td>20</td> <td>~0% Favourable, ~0% Unknown, ~100% Unfavourable</td> <td>~0% Favourable, ~0% Unknown, ~100% Unfavourable</td> </tr> <tr> <td>Coastal habitats</td> <td>32</td> <td>~25% Favourable, ~10% Unknown, ~65% Unfavourable</td> <td>~20% Favourable, ~10% Unknown, ~70% Unfavourable</td> </tr> </tbody> </table> <p>Conservation status of habitats in biogeographical and marine regions</p> <p>Note: wide bar corresponds to the 2007-2012 reporting period, and the narrow bar to the 2001-2006 reporting period. The number in brackets corresponds to the number of biogeographical assessments in the category.</p> <p>The graph above shows a decrease in the number of habitats with unknown conservation status which demonstrates the effort of the relevant authorities in improving the data available. There are no forest habitats with unfavourable/bad (red bar) status although the number of forest habitats with favourable status also decreased.</p> <p>The Fifth National Report to CBD (https://www.cbd.int/doc/world/pt/pt-nr-05-pt.pdf) shows that Portugal is acting to reduce threats to biodiversity and meet the Aichi Biodiversity Targets by 2020 – the country is implementing several initiatives directed to each Target, which are described in detail in this report, however, several issues are identified that need to be addressed over the next years, such as improvements on the:</p>	Habitat Category	Number of Assessments	2001-2006 (Narrow Bar)	2007-2012 (Wide Bar)	Forests	25	~15% Favourable, ~5% Unknown, ~80% Unfavourable	~25% Favourable, ~5% Unknown, ~70% Unfavourable	Rocky habitats	15	~55% Favourable, ~5% Unknown, ~40% Unfavourable	~65% Favourable, ~5% Unknown, ~30% Unfavourable	Bogs, mires & fens	8	~15% Favourable, ~5% Unknown, ~80% Unfavourable	~25% Favourable, ~5% Unknown, ~70% Unfavourable	Grasslands	16	~25% Favourable, ~5% Unknown, ~70% Unfavourable	~45% Favourable, ~5% Unknown, ~50% Unfavourable	Sclerophyllous scrubs	10	~50% Favourable, ~5% Unknown, ~45% Unfavourable	~40% Favourable, ~5% Unknown, ~55% Unfavourable	Heath & scrub	10	~60% Favourable, ~5% Unknown, ~35% Unfavourable	~50% Favourable, ~5% Unknown, ~45% Unfavourable	Freshwater habitats	20	~40% Favourable, ~10% Unknown, ~50% Unfavourable	~40% Favourable, ~10% Unknown, ~50% Unfavourable	Dunes habitats	20	~0% Favourable, ~0% Unknown, ~100% Unfavourable	~0% Favourable, ~0% Unknown, ~100% Unfavourable	Coastal habitats	32	~25% Favourable, ~10% Unknown, ~65% Unfavourable	~20% Favourable, ~10% Unknown, ~70% Unfavourable
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- i) implementation of strategic guidelines namely the National Strategy for Nature and Biodiversity Conservation;
- ii) integration of biodiversity issues in the different sectors and policies;
- iii) classification, inventory, ecological characterization and monitoring of biodiversity;
- iv) engagement of the private sector,
- v) biodiversity valuation process and its integration on public accounting,
- vi) management efficiency of the conservation status of threatened species (including ex situ),
- vii) control and elimination of exotic invasive species,
- viii) habitat restoration,
- ix) enforcement actions related to crimes against biodiversity and
- x) promotion of active participation of civil society in biodiversity issues.

By analysing this report, it can be seen that Portugal has taken several measures to achieve CBD's goals, concluding from the need for a greater integration of biodiversity issues in different sectors and policies and the greater involvement of the private sector in this area.

The table below shows the priority habitats listed in the Habitats Directive Report, in which forestry activities have an impact. Those priority habitats were targeted with LIFE Projects. [FSC-NRA-PT V1-0]

Code_habitat	R_Biog	Global evaluation	Threats (forestry scope)	Management guidance (forestry scope)
2250	MED	U1 Stable	Under-covered vegetation control	Forest management oriented for habitat conservation; Promote and actively encourage forest management including objectives for under-covered conservation of Juniperus; Promote recovery, revegetation and bio-remediation plans to restore Juniperus in their potential area of occurrence, where it has been altered or extinct.
2260	MED	U1 Stable	Destruction by vegetation control associated with pine forest management practices	Developing forest management practices by combining fire protection and habitat preservation, for example, vegetation control only on patches or firebreaks; Regulate the changes of land use in the habitat area, prohibiting harmful activities on the vegetation or changes in the land use in dunes with no vegetation.
3170	MED	U2	---	

			Stable		
	5210	MED	U1 Declining	Afforestation; Fires, in situations where Juniperus has a significant proportion of mosaic with Cistus species; Non-selective vegetation control for fire prevention; Vegetation control near streams; Forestation resulting in substantial alteration of structure or complete disappearance of habitat.	Interdict afforestation in the habitat area; Regulate shrub cutting (vegetation control) in cork areas near or in mosaic with Juniperus species; Control fire risk without destroying vegetation (firebreaks, selective vegetation control); Restore forest areas with potential for the Juniperus species.
	5230	ATL MED	U1 Declining	Silvicultural expansion; fires; Laurus nobilis leaf cutting.	Condition silvicultural expansion; Stabilization of ecological succession; Reduction of fire hazards; Regulate Laurus nobilis leaf cutting; Eradication of invasive alien plants.
	6310	MED	U1 Stable	Absence of regeneration, functional stress or disruption of the system itself; Pests and diseases; Lack of interest of economic operators; Afforestation with species not suitable in cork areas; Fire	Promote and manage natural regeneration; manage grazing; cork and holm oak plantations, inf necessary.
	6510	ATL MED	U1 Declining	Plantations.	Hedge maintenance in the neighbourhood.
	9230	ATL MED	U1 improving	Fire; Clear cut; afforestation	Restoration of degraded oak lands, in particular through the management of natural regeneration, grazing elimination and reduction of fire risk.

	9240	MED	U1 improving	Change of land use. Low economic value and existence of more profitable land uses such as agriculture or of fast-growing forest plantations. Unsuitable forest planning. Fire. Over-harvesting.	Avoid land use changes. Strengthen supervision on residue disposal. Minimize harvesting, under-covered disturbances. Removal of exotic species. Selective harvesting. Creation of a seed bank. Regeneration monitoring. Preserve shrub hedges. Promote afforestation. Forest mosaic maintenance. Potential ecosystem services.
	9260	MED	FV	Harvesting; diseases	Regulate harvesting; Control Phytophthora cinnamomi and chestnut cancer (Cryphonectria parasitica)
	9330	MED	U1 declining	Land use changes. Unsuitable forest planning. Forest fires.	Restore marginal areas. Regulate land use changes. Maintain and promote habitat. Carry out measures to prevent fire risk. Supervision of waste disposal.
	9340	MED	U1 stable	Land use changes. Grazing. Unsuitable forest planning. Fires	Restore of marginal areas. Regulate land use changes. Implement measures for fire prevention. Control of waste disposal. Active management of the habitat.
	9560	MED	U1 stable	---	
	9580	ATL MED	U1	Fire; Harvesting and grazing	Harvesting planning. Reduce fire risk.
	91B0	MED	U1	Clear cut. Grazing. Harvesting for animal feeding. Replacement by fast-growing forest plantations.	Ecological succession management. Reduction of the competition under-covered vegetation. Harvesting planning. Control exotic species.
	92A0	MED	U1	Harvesting. Vegetation control in riparian areas.	Harvesting conditioning. Manual vegetation control and manual extraction of dead trees.

Reference should be made to the development of the Biodiversity Information and Monitoring of northern Portugal (SIMBioN), developed by the ICNB, IP, and by CIBIO, which had, among its objectives, to provide the ICNB, IP with a tool to support

	<p>biodiversity management and contribute to scientific knowledge and public dissemination of biodiversity.</p> <p>Conclusion:</p> <p>It is important to highlight that, as stated before in indicators 2.1.1 and 2.1.2, forest operations are identified in the Habitats (2007-2012) Directive Implementation Report [1] from Portugal to present a “high importance” threat (future) in 6 habitats and pressure (current) on 8 habits accounting for 3.8% and 5%, respectively, of the total assessments.</p> <p>The overall conservation status trends of habitats, as well as the number of attributes from which the conservation trends are unknown imposes the risk to be assessed as <u>specified</u> for the habitats identified as unfavourable where forest related activities present pressures and threats.</p>
<p>Means of Verification</p>	<p>Best Management Practices Supply contracts Assessment of potential impacts at operational level and of measures to minimise impacts Monitoring results Publicly available information on the protection of the identified values Regional, publicly available data from a credible third party</p>
<p>Evidence Reviewed</p>	<p>[1] Birds (2008-2012) and Habitats (2007-2012) Directive Implementation Reports, http://www2.icnf.pt/portal/pn/biodiversidade/rn2000/dir-ave-habit [2] http://www.icnf.pt/portal/naturaclas/ei/cempa/pp-monit/pnmaai [3] http://www.icnf.pt/portal/naturaclas/ei/projeto-de-estacoes-de-esforco-constante http://www.apaa.pt/peec/index.html [4] http://www.icnf.pt/portal/naturaclas/patrinatur/especies/mam/morc http://www.icnf.pt/portal/naturaclas/patrinatur/resource/docs/Mam/morc/prog-abri-sub1988-2012v3 [5] http://www.icnf.pt/portal/naturaclas/patrinatur/resource/docs/Mam/morc/morc-crit-aval-abrig [6] http://www.spea.pt/pt/estudo-e-conservacao/censos/censo-de-aves-comuns/ [7] http://www.spea.pt/fotos/editor2/relatoriocac_2011.pdf [8] http://www.spea.pt/pt/estudo-e-conservacao/censos/canan/ [9] http://www.spea.pt/pt/participar/grupos-de-trabalho/aves-noturnas/monitorizacao/ [10] http://www.spea.pt/pt/estudo-e-conservacao/censos/dias-ram/ INCF Birds Directive (2008-2012) article 12 PT Summary http://www.icnf.pt/portal/pn/biodiversidade/rn2000/dir-ave-habit/resource/doc/National_Summary_for_Article%2012%20%20PT.pdf</p>
<p>Risk Rating</p>	<p><input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>

	Indicator																																																																				
2.2.4	Biodiversity is protected (CPET S5b).																																																																				
Finding	<p>Relevant biodiversity attributes are identified in indicator 2.1.1, specifically on HCV1. The threats are described in indicator 2.1.2. Indicators 2.1.1, 2.1.2, 2.2.3 and 2.2.4 are complementary and this character shall be taken into account during the assessment.</p> <p>National summary of the implementation of the Habitats Directive (2007-2012) provides the graphs below, showing the comparison between the conservation status of species within the timeframe of the last two Habitats directive reports, 2001 to 2006 and 2007 to 2012.</p> <table border="1"> <caption>Conservation status of species in biogeographical and marine regions</caption> <thead> <tr> <th>Species Group</th> <th>Assessments</th> <th>2001-2006 (Narrow Bar)</th> <th>2007-2012 (Wide Bar)</th> </tr> </thead> <tbody> <tr> <td>Mammals</td> <td>(98)</td> <td>~10% (Green)</td> <td>~10% (Green)</td> </tr> <tr> <td>Mammals</td> <td>(96)</td> <td>~10% (Green)</td> <td>~10% (Green)</td> </tr> <tr> <td>Reptiles</td> <td>(18)</td> <td>~30% (Green)</td> <td>~30% (Green)</td> </tr> <tr> <td>Reptiles</td> <td>(21)</td> <td>~30% (Green)</td> <td>~30% (Green)</td> </tr> <tr> <td>Amphibians</td> <td>(20)</td> <td>~75% (Grey)</td> <td>~75% (Grey)</td> </tr> <tr> <td>Amphibians</td> <td>(20)</td> <td>~20% (Green)</td> <td>~20% (Green)</td> </tr> <tr> <td>Fish</td> <td>(30)</td> <td>~35% (Green)</td> <td>~35% (Green)</td> </tr> <tr> <td>Fish</td> <td>(33)</td> <td>~15% (Green)</td> <td>~15% (Green)</td> </tr> <tr> <td>Arthropods</td> <td>(19)</td> <td>~95% (Grey)</td> <td>~95% (Grey)</td> </tr> <tr> <td>Arthropods</td> <td>(17)</td> <td>~50% (Grey)</td> <td>~50% (Grey)</td> </tr> <tr> <td>Molluscs</td> <td>(18)</td> <td>~15% (Green)</td> <td>~15% (Green)</td> </tr> <tr> <td>Molluscs</td> <td>(14)</td> <td>~60% (Grey)</td> <td>~60% (Grey)</td> </tr> <tr> <td>Vascular plants</td> <td>(205)</td> <td>~25% (Green)</td> <td>~25% (Green)</td> </tr> <tr> <td>Vascular plants</td> <td>(209)</td> <td>~15% (Green)</td> <td>~15% (Green)</td> </tr> <tr> <td>Non-vascular plants</td> <td>(18)</td> <td>~30% (Green)</td> <td>~30% (Green)</td> </tr> <tr> <td>Non-vascular plants</td> <td>(19)</td> <td>~10% (Green)</td> <td>~10% (Green)</td> </tr> </tbody> </table> <p>Note: wide bar corresponds to the 2007-2012 reporting period, and the narrow bar to the 2001-2006 reporting period. The number in brackets corresponds to the number of biogeographical assessments in the category.</p> <p>Forestry presents a “high importance” threat to 7.7% of the species assessed and puts pressure on 9.6% of the total 426 species considered.</p> <p>Regarding the monitoring programs and systematic monitoring of species, the Habitats Directive requires periodic assessment of the conservation status of many relevant habitats. The Planning and Management Plans of the Protected Areas and Classified Areas of the Natura2000 network may also integrate a monitoring program for a periodic evaluation of the implementation of the proposed measures and actions. In addition, Environmental Impact Assessment processes involve the monitoring of key environmental descriptors (namely, fauna, flora and vegetation) potentially affected by project implementation.</p> <p>A number of monitoring programs have been implemented for certain species as representatives of a given taxonomic group that may integrate the set of indicators of progress achieved towards a significant reduction in the rate of biodiversity loss.</p> <p>ICNF coordinates several long-term monitoring programs addressed to several species and groups of birds:</p>	Species Group	Assessments	2001-2006 (Narrow Bar)	2007-2012 (Wide Bar)	Mammals	(98)	~10% (Green)	~10% (Green)	Mammals	(96)	~10% (Green)	~10% (Green)	Reptiles	(18)	~30% (Green)	~30% (Green)	Reptiles	(21)	~30% (Green)	~30% (Green)	Amphibians	(20)	~75% (Grey)	~75% (Grey)	Amphibians	(20)	~20% (Green)	~20% (Green)	Fish	(30)	~35% (Green)	~35% (Green)	Fish	(33)	~15% (Green)	~15% (Green)	Arthropods	(19)	~95% (Grey)	~95% (Grey)	Arthropods	(17)	~50% (Grey)	~50% (Grey)	Molluscs	(18)	~15% (Green)	~15% (Green)	Molluscs	(14)	~60% (Grey)	~60% (Grey)	Vascular plants	(205)	~25% (Green)	~25% (Green)	Vascular plants	(209)	~15% (Green)	~15% (Green)	Non-vascular plants	(18)	~30% (Green)	~30% (Green)	Non-vascular plants	(19)	~10% (Green)	~10% (Green)
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- National program for monitoring of winter waterfowl, for species highly dependent on wetlands. This program has been in force since 1976. This project comprises the annual assessment of the population and distribution of Anseriformes and Gruiformes species. [2]
- Stations of constant effort project. Has the objective of monitoring the population alterations of Passeriformes e quasi-Passeriformes species with wide distribution. [3]

Specific monitoring actions at regional level:

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

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

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

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

In addition, it establishes a strategic model for the implementation of the breeding program in captivity, the recovery and maintenance of the favourable habitat, and the reintroduction of specimens of the species in suitable territories. Among other aspects, it emphasizes the importance of agricultural, forestry and game management to create the right conditions so that this essential objective can be successfully achieved.

The Action Plan results from the directives of action of the National Strategy for the Conservation of Nature and Biodiversity and is the result of a long process of preparation that included a procedure of public auscultation.

- Monitoring program for cave species of bats in progress since 1987.

Annually, the most important winter and maternity shelters are visited at national level, and an annual estimate is made of the actual numbers present. A recent analysis of data collected between 1988 and 2012 includes population trends of seven species calculated using TRIM software. [4]

The use of updated criteria to evaluate shelters of national importance showing that there are currently 76 major shelters (3 important ones throughout the year, 43 hibernacula and 40 maternities). [5]

- CAC (Censo de Aves Comuns), a long-term monitoring program for common birds and their habitats in Portugal. Launched by the Portuguese Wild Bird Society (SPEA) in 2004, in mainland Portugal and Madeira, and in 2007 in the Azores. It is integrated into the Pan-European Common Bird Monitoring Scheme (PECBMS). [6] This census received public support in 2009 and 2010. It continues to be carried out annually but lacks funding, namely for processing and analysis of data, reporting of results and support to the network of volunteers, which has made unfeasible the provision of Common Bird Indexes (IACZA, IACZF, etc.) to the public administration. These indexes have been published until 2009. After 2009, only CAC reports are available, which only contain information disaggregated by species; [7]
- CANAN (Bird counts at Christmas and New Year), monitoring of population trends of wintering bird species in Portugal's agricultural fields; [8]
- NOCTUA-Portugal, monitoring of nocturnal birds; [9]
- RAM, network of observation of birds and marine mammals; [10]
- Project Arenaria, monitoring the distribution and abundance of birds on the beaches and coasts of Portugal;
- Monitoring scheme of the bustard (*Otis tarda*);
- Monitoring scheme of the imperial eagle (*Aquila adalberti*).
- Monitoring the mortality of vertebrates by trampling on roads in Portugal.

Since 2010, a joint project of the University of Lisbon and Estradas de Portugal, S.A., with the objective of minimizing road mortality and improving the permeability of routes through the identification of points of high mortality and improvement of the hydraulic passages for the passage of animals;

As a contribution to the establishment of a reference framework for species, the most important are the Portuguese Atlas of Bats, the Winter Migratory Birds, the Atlas of Nesting Birds in the Madeira Archipelago, the Atlas of Birds (In prep.) And the 6th volume of the Madeira Biodiversity collection: Evaluation and Conservation of the native terrestrial vertebrates of the Madeira and Selvagens Archipelagos - Reptiles and Mammals. The project of the Atlas of Bats of Portugal (mainland), which involved about 150 volunteers, had as main objectives to map the current distribution of the 25 species of bats with known occurrence in mainland Portugal, to fill a database to make this information available to stakeholders and, together with the 2011-2012 Year of the Bat campaign, mobilize and encourage

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

	Indicator
2.2.5	The process of residue removal minimises harm to ecosystems.
Finding	<p>Adding to the findings of indicator 2.2.2 on soil quality.</p> <p>In Portugal forest residue removal from forests is regulated so loggers and owners have some legal obligations, related with both fire and phytosanitary policies. These obligations are dependent on species, areas, seasons and regions.</p> <p>Depending on forestry procedures and forest models, the solutions adopted about forest residues are a) integrating them in the soil; b) remove them or c) burn them in the appropriate season. All of these operations include advantages and disadvantages according to the focus of the overview.</p> <p>In the case of removal, it is always considered a harm to the remaining forest, soil, fauna and flora.</p> <p>Process of forest residue removal is commonly included on Best Practices but also on wood supply contracts, and forest land leasing.</p> <p>In 2018GNR SEPNA carried out an operation aimed at the inspection of vehicles transporting coniferous timber and timber products called "Resina 2018". GNR monitored 24115 vehicles transporting coniferous material, such as pallets, planks, beams, trunks, plants, woodchips and other derivatives, and 628 violations were detected, of which stand out:</p> <ul style="list-style-type: none"> ● 583 for unreadable marking of wood, especially on pallets, which atone for the treatment thereof for the elimination of the disease; ● 34 for total absence of marking; ● <u>4 for lack of a phytosanitary passport, mandatory for the movement of wood</u> <p>Based on the available information, this indicator is considered low risk</p>
Means of Verification	<p>Best Management Practices;</p> <p>Records of BP's field inspections;</p>

	<p>Assessment at operational level of measures designed to minimise impacts on the values identified</p> <p>Level of enforcement of legal framework</p>
Evidence Reviewed	<p>National System for Forest Fire Prevention: https://dre.pt/application/dir/pdf1sdip/2006/06/123A00/45864599.pdf</p> <p>Good Forest Practices http://www.icnf.pt/portal/florestas/gf/documentostecnicos/resource/doc/Boas-Praticas-Florestais.pdf</p> <p>Pinus Wilt Disease:</p> <ul style="list-style-type: none"> •Dec.Retif. n.º 38/2015 of 01/09 •DL 123/15, of 3/07 •DL 95/2011, of 8/08 •DL 154/05 6/09 •Dec. n. 30-A/2011, of 7/10
Risk Rating	<p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>
	Indicator
2.2.6	<p>Negative impacts on ground water, surface water and water downstream from forest management are minimised (CPET S5b).</p>
Finding	<p>Forest resources have a positive impact on water resources, compared with other land uses, such as agriculture.</p> <p>In the case of river basins, information related to the classification of flood plains, areas threatened by floods and other relevant information can be partially obtained by consulting areas included in the National Ecologic Reserve (REN). River basin plans (PGBH) also contain relevant information, as do PROFs, especially where they refer to protection forests.</p> <p>For information about erosion control it is essential to consult documentation relevant to the risk of erosion. Some of this information is contained in the REN, which identifies, on a scale of 1:25.000, areas at high risk of erosion, as well as zones of instability.</p> <p>National Ecological Reserve is a territory classification of sensitive areas for “ecosystem services” where water issues are addressed, and some restrictions are in place to prevent negative impacts in slopes, valleys and other sensitive situations. All forest projects and plans must comply with this regulation, and they should be in place, for example in projected soil preparation techniques.</p> <p>The ICNF Handbook for forest best practices defines: “In the areas surrounding the water lines the risk of erosion is often very high, since these are areas of concentration of rainwater runoff. In these bands (with a minimum width of 10 metres on either side, as stated in the legal definitions and conditions of legal limits (<u>Decree-Law No. 468/71, of 5th November</u>) a strict prevention of erosion phenomena shall be performed, and it is therefore essential to adopt measures to protect it, such as maintaining all or a significant part of the spontaneous vegetation and not perform any mobilization of the soil.”</p> <p>Decree-law No. 173/88, May 17th establishes the definition of premature cutting operations on Eucalyptus and Pinus Pinaster settlements and defines limitations for these operations.</p>

Decree-law No. 139/89, April 28th establishes the legal framework for the protection of natural slope, arable soil and vegetation cover.

Decree-law No.151-B, July 19th defines the obligation to perform an Environmental Impact Assessment on every afforestation and reforestation occurring in areas ≥ 350 ha (70ha in sensitive areas) or ≥ 140 ha (30ha in sensitive areas) if the subject area, in conjunction with pre-existent forest stands of the same species, separated by less than 1 km, would produce a continuous forested area of more than 350ha (70ha in sensitive areas). It also establishes that an Environmental Impact Assessment must be done when there is a deforestation action in areas ≥ 50 ha (10ha in sensitive areas). PROF in northern regions (21% of the territory) defines a maximum area for clear cuttings of 10ha.

[Coelho, Inocência](#) identifies typical distribution of the Forest private property in several regions of the Portuguese mainland where only Alentejo and Ribatejo regions show an average property size above 7ha per owner and more than 50% of the properties with more than 100ha. For properties with dimensions above 100ha it is mandatory to prepare and submit a Forest Management Plan to be analysed by ICNF which comprises strategies to minimize impact on water resources created by forest operations.

The forest operations occurring in other regions of the country, mainly above the Tagus river, where more than 50% of the properties have less than 10ha and average sizes ranging from 1.46 to 2.83ha per owner, will unlikely spread across areas greater than 10h, due to the fragmentation of the rural real estate.

At a regional level, Municipal Forest Regulations (see references below) define the permitted operations near water lines considering the potential hazard of erosion, fire propagation and water displacement, namely:

- Species permitted near water lines and riparian galleries, excluding fast growing species from afforestation and reforestation activities (ordinance No.528/89, July 11th)
- Mandatory low density of settlements on afforested and reforested areas
- Advice on the species considered as appropriate to a defined location;
- Use of heavy machinery limited to no less than 10 metres from the water line
- Clear cutting operations and management activities must be previously authorized by the municipality.

There are forestry best practices handbooks for operations occurring on river basins and forest areas near dams easily accessible online and through forest owners' associations, as well as a strong legal framework regarding operations within the mentioned areas. At the same time, North of the Tagus river, where the implementation of Forest Management Plans is not as visible as in the southern region of Portugal, the average property size is considerably small, which reduces the risk for this indicator.

Taking a precautionary approach, specified risk is defined.

Means of Verification	<p>Internet research GIS maps of HCV areas Regional, publicly available data from a credible third party like FSC and PEFC reports Forest Management plan like PGF, PUB, PEIF Game management plans Regional Forest Plans Forest Best Management Practices Forest Operating Procedures Records of BPs' field inspections Monitoring records Publicly available information on the protection of the values identified Historical maps and enquiries with stakeholders Aerial photos Approved EIA when applicable. Records of oil and hazardous chemicals deliveries. Assessment at operational level of measures designed to minimise impacts on the values identified Erosion and desertification programs and maps Approved RJAAR</p>
Evidence Reviewed	<p>http://www.icnf.pt/portal/icnf/serv/biblioteca/resource/ficheiros/boas-praticas-florestais/at_download/file https://dre.pt/application/dir/pdf1sdip/1988/05/11400/20632064.pdf https://dre.pt/application/dir/pdf1sdip/1989/04/09800/17811782.pdf https://dre.pt/application/file/a/497960</p> <p>Water Law: Dec-Law No. 130/2012 22/06 https://dre.pt/application/dir/pdf1sdip/2012/06/12000/0310903139.pdf National Water Plan: http://www.apambiente.pt/?ref=16&subref=7&sub2ref=9&sub3ref=833 Hydrographical basin Plans http://www.apambiente.pt/?ref=16&subref=7&sub2ref=9&sub3ref=834#pgbh-tabela Ecological Reserve National Law: https://dre.pt/application/dir/pdf1sdip/2012/11/21200/0630806346.pdf https://www.uc.pt/fluc/nicif/riscos/Documentacao/Territorium/T04_artg/T04_Artg10.pdf https://www.repository.utl.pt/bitstream/10400.5/1307/1/REP-Fabiao%2C%20A.-Madeira et al 2007.pdf Strategic Guidance for Intervention on water courses, (Hydrographic Administration of the Centre Region) https://www.apambiente.pt/_zdata/Divulgacao/Projectos/agua/EstudoEstrategico/GuiaIntervencaoLinhasAquaARHC.pdf</p> <p>Forestry Best Practices Handbook for Castelo de Bode Dam, Guiomar, N, Fernandes, J.P.A., http://www.epal.pt/EPAL/docs/default-source/epal/biodiversidade/publica%C3%A7%C3%B5es/manual-de-boas-pr%C3%A1ticas-de-gest%C3%A3o-dos-esp%C3%A7os-florestais.pdf?sfvrsn=10</p> <p>Practical Guide for Interventions on Sensitive Areas, Forestis, 2007, http://forestis.pt/forestis/multimedia/File/Relatorio_Proj/Guia_Areas_Riscos.pdf Example of Forest Municipal Regulations: Cantanhede: http://www.cm-cantanhede.pt/mcsite/Media/upload/2011/20111017165413_Regulamento_Municipal_Floresta.pdf Alvaiázere: http://ftp.cm-alvaiazere.pt/regulamentos/Regulamento_florestal.pdf Ferreira do Zêzere: www.cm-ferreiradozezere.pt/component/attachments/download/1617</p>

Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA																																																																																																																																																																																																																																								
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2.2.7	Air quality is not adversely affected by forest management activities.																																																																																																																																																																																																																																								
Finding	<p>Air legal framework includes air law and national air quality plan, the Portuguese Environment Agency being the national authority. Other police authorities like SEPNA (National Republican Guard) and Nature Guards and Rangers, also have competencies on air pollution inspection actions.</p> <p>Major negative impacts from forests are due to forest fires which are not considered management activities.</p> <p>Burning forest residues at the forest site is prevented with forest feedstock sourcing for biomass and legal framework in force during high fire hazard periods. Forest equipment must comply with EU directives on air pollution.</p> <p>According to the National Inventory Report on Greenhouse Gases 1995-2015 developed by Portuguese Environment Agency (APA), the Portuguese forest acted as a carbon sink in the period of the study with a net carbon sequestration of 753.2 Gigagrams. Only forestry and agriculture showed this trend during the period of the study.</p> <table border="1" data-bbox="336 958 1362 1122"> <thead> <tr> <th>GHGs SOURCE AND SINK CATEGORIES</th> <th>1990</th> <th>1991</th> <th>1992</th> <th>1993</th> <th>1994</th> <th>1995</th> <th>1996</th> <th>1997</th> <th>1998</th> <th>1999</th> <th>2000</th> <th>2001</th> <th>2002</th> </tr> </thead> <tbody> <tr> <td colspan="14" style="text-align: center;">CO₂ equivalent (Gg)</td> </tr> <tr> <td>1. Energy</td> <td>41,222</td> <td>42837.714</td> <td>47,376</td> <td>46,063</td> <td>46,768</td> <td>50,291</td> <td>47,655</td> <td>50,209</td> <td>54,603</td> <td>61,907</td> <td>60,311</td> <td>60,493</td> <td>64,129</td> </tr> <tr> <td>2. Industrial processes and product use</td> <td>5,839</td> <td>5800.7327</td> <td>5,504</td> <td>5,398</td> <td>5,429</td> <td>6,107</td> <td>6,131</td> <td>6,608</td> <td>6,772</td> <td>7,168</td> <td>7,421</td> <td>6,956</td> <td>7,319</td> </tr> <tr> <td>3. 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Land use, land-use change and forestry(5)	1,344	1436.1064	-3,327	-4,459	-5,123	-4,724	-8,578	-9,553	-8,082	-8,847	-6,031	-9,431	-8,908	5. Waste	5,361	5550.3718	5,782	5,965	6,243	6,535	6,573	6,775	7,063	7,139	7,215	7,361	7,654	6. Other	NO	GHGs SOURCE AND SINK CATEGORIES	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	% change 1990-2015	CO ₂ equivalent (Gg)															1. Energy	59,038.61	61,303.39	63,708.45	59,317.52	56,210.27	54,241.84	52,998.33	48,530.40	47,870.85	46,422.83	44,280.28	43,786.66	48,157.50	16.8	2. Industrial processes and product use	7,390.74	8,112.36	8,138.95	7,934.81	8,788.26	8,623.19	6,943.93	7,367.93	6,788.13	6,514.21	7,002.50	7,503.08	7,578.89	29.8	3. Agriculture	6,552.93	6,663.75	6,613.00	6,551.88	6,681.10	6,630.12	6,541.58	6,472.12	6,436.58	6,481.31	6,468.34	6,566.04	6,623.53	-5.1	4. 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Means of Verification	<p>Forest Best Management Practices Supply contracts Records of BPs' field inspections Assessment at operational level of measures designed to minimise impacts on the values identified Publicly available information on the protection of air quality as APA website. Regional, publicly available data from a credible third party The existence of a strong legal framework in the region</p>																																																																																																																																																																																																																																								
Evidence Reviewed	<ul style="list-style-type: none"> Environmental Laws: <ul style="list-style-type: none"> Law No. 19/14 of 14/04 artº10ºd) DL No.49/05, of 24/02 artº20º • DL 197/2005, of 8/11 artº 1º, No.3 b) and No.4, Decree-Law No. 102/2010 of 23/09 https://dre.pt/application/dir/pdf1sdip/2010/09/18600/0417704205.pdf Machinery <ul style="list-style-type: none"> NP 1948, of 1994 NP 2761, of 1988 NP EN 13525:2005+A2:2009 																																																																																																																																																																																																																																								
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	Indicator
2.2.8	There is controlled and appropriate use of chemicals, and that Integrated Pest Management (IPM) is implemented wherever possible in forest management activities (CPET S5c).
Finding	<p>The national legal framework for the use of agrochemicals is Law No. 26/2013 from April 11th which applies to the Portuguese context of EU Directive No. 2009/128/CE, of 21/10 and it states:</p> <ul style="list-style-type: none"> - Only distributing companies and sales outlets authorized by the Directorate-General for Food and Veterinary (DGAV) may carry out the activity of distribution or sale of phytopharmaceuticals; - Establishes the qualification requirements for the responsible technician for the trade of the chemical products; - Defines the minimum training required for the user and applicator of the phytopharmaceuticals; - Defines the good practices to reduce the negative impacts of the use of phytopharmaceuticals. <p>The implementation of this law had a very positive impact on the use of agrochemicals and included the necessity of accreditation and records (quantities, disposals, etc.) for all the operators involved.</p> <p>The use of chemicals on Portuguese forests is not common and it is very restricted to a few cases because, among others, there are few homologated products applied to the most important phytosanitary forest plagues and diseases.</p> <p>Based on available information the requirements included in this indicator are considered low risk.</p>
Means of Verification	<p>Existing legislation; Level of enforcement; Assessment at operational level of measures designed to minimize impacts on the values identified; Monitoring records; Interviews with staff. Records of chemicals deliveries;</p>
Evidence Reviewed	<p>Law No. 26/2013 of 11 /04: https://dre.pt/application/file/260367 Pine processionary official Plan: http://www.icnf.pt/portal/florestas/prag-doe/resource/doc/proc/proc-florest-2015.pdf Eucalyptus snout beetle official plan: http://www.icnf.pt/portal/florestas/prag-doe/ag-bn/gorg-eucal</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
	Indicator
2.2.9	Methods of waste disposal minimise negative impacts on forest ecosystems (CPET S5d).
Finding	<p>The legal framework for waste disposal is based on a recent law which applies to the Portuguese legal framework of EU Directive No. 2008/98/CE.</p> <p>The Portuguese Environment Agency is the national authority but other police authorities like SEPNA (National Republican Guard) and Nature Guards and Rangers have surveillance competencies in this matter, as well as municipal authorities that can implement municipal regulations in conformity with the relevant legislation.</p>

	<p>Waste disposal on forest lands exist in Portugal and it affects both private and public lands.</p> <p>But as it is illegal in the country there are efforts made by private owners and authorities to collect the waste and send it to a final legal destination.</p> <p>Some of the measures used by owners include fencing off their lands, sign installation against waste disposal and filling complaints to authorities in case of illegal waste disposal.</p> <p>Based on available information the requirements included in this indicator are considered low risk.</p>
Means of Verification	Existing legislation; Level of enforcement; Regional Best Management Practices
Evidence Reviewed	Waste Management and Planning Official page: https://www.apambiente.pt/index.php?ref=16&subref=84 Decree-Law No. 73/2011 of 17/06: https://www.apambiente.pt/_zdata/Políticas/Resíduos/DL_73_2011_DQR.pdf National Waste Management Plan: file:///C:/Users/imobi_000/Downloads/Projeto_PNGR_2011-2020.pdf European Waste Statistics: http://ec.europa.eu/eurostat/statistics-explained/index.php/Waste_statistics/pt
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
	Indicator
2.3.1	Analysis shows that feedstock harvesting does not exceed the long-term production capacity of the forest, avoids significant negative impacts on forest productivity and ensures long-term economic viability. Harvest levels are justified by inventory and growth data.
Finding	<p>Statistical information on the National Forest Inventory is fully available from IFN5 (2005) and preliminary results from IFN6 (2010).</p> <p>Preliminary results from IFN6 (2010) for main species in pellet production show that:</p> <ul style="list-style-type: none"> • The total forest area in Mainland Portugal is 3,154,800 ha of which 2,972,356 ha correspond to forested area. • Eucalyptus is the species with the largest area of settlements. Forest cover with Eucalyptus has increased 13% from 1995 to 2010 (over 90,000 ha in the period to a total surface of 812,000 ha in 2010; 755,355 ha in forested areas) mostly in areas converted from Pinus Pinaster (70,000 ha in the period). Pinus Wilt Disease/Nemátodo-do-pinheiro pest, fires and economic motivations can be behind it. • Pinus Pinaster forests have decreased significantly from 1995 to 2010: 27% in total surface (263,000 ha in the period to a total surface of 713,000 ha in 2010; 624,248 ha in forested areas). 163,000 ha were converted to open land, mostly related to Pinus Wilt Disease/Nemátodo-do-pinheiro pest and fires and 70,000 ha to Eucalyptus plantations, which can also include economic motivations. Represents the majority of inputs in BP feedstock. • Pinus Pinea forests have increased significantly from 1995 to 2010: 54% (over 55,000 ha in the period to a total surface of 175,000 ha in 2010; 173,716 ha in forested areas). This species is planted primarily for the harvest of pine nuts and protective land use. They have impact on feedstock in southern pellet plants. It is not subject to harvest for round wood production so feedstock comes as a result of silvicultural works. This species has good biomass percentage in relation to its volume as a result of branches.

	<p>Analysing statistical information available for average annual growth (AMA) from IFN5 (2005) shows for Mainland Portugal:</p> <ul style="list-style-type: none"> On Eucalyptus an average annual growth of 4,375,000 m³/year based on 2005 inventory data. Currently the value will be significantly higher. Eucalyptus wood from Portugal consumption in 2014 was 5,400,000 m³ (CELPA data). Eucalyptus is a fast-growing species, over 12 years, with one single cut in the period: final clear cut. So, harvesting does not compromise long-term production of the forest. On Pinus Pinaster an average annual growth of 3,650,000 m³/year based on 2005 inventory data. Currently the value will be lower. Pinus Pinaster wood from Portugal harvested in 2014 was 2,247,000 m³ (Centro Pinus data). So, Pinus Pinaster wood available from Portugal is under AMA. <p>On the analysis it is relevant also to take into account that:</p> <ol style="list-style-type: none"> Pinus Wilt Disease/Nemátodo-da-madeira-do-pinheiro pest has significantly affected Pinus Pinaster. Fires continue to be a relevant problem in Portugal. Data from CentroPinus states that pine wood consumption of timber industry in 2014 was 4,360,000 m³, with relevant data of 1,400,000 m³ for pellets, 32% of the total. Also 32% of pine wood used by CentroPinus partners was imported in 2014. Percentage of imported pine wood used in 2006 was 3%. So, lack of pine wood from Portugal is being covered with importations, mainly from Spain. Data from CELPA states that Eucalyptus consumption of pulp and paper industry in 2014 was 7,800,000 m³ (4,980,000 m³ in 2005), of which 2,415,000 m³ were imported, mainly from Spain. The <u>PROF</u> for each region defines a silvicultural model for pine species, which is designed to improve long-term production capacity for the forest. <p>Hence, all the above information shows that actual harvesting volume does not exceed sustainable values and compromises long-term economic viability of stands. Thus, the risk for this indicator has been assessed as Low.</p>
Means of Verification	Volume and growth data and yield calculations, and Operational Practice indicate that biomass feedstock harvesting rates avoid significant negative impacts on forest productivity and long-term economic viability.
Evidence Reviewed	<p>Estratégia Nacional das Florestas (RCM n.º 6-B/2015 - Diário da República n.º 24/2015, 1º Suplemento, Série I de 2015-02-04); ICNF portal (http://www.icnf.pt/portal/icnf/docref/enf)</p> <p>Estatísticas Agrícolas 2015.xls, Instituto Nacional de Estatística (https://www.ine.pt/xportal/xmain?xpid=INE&xpgid=ine_publicacoes&PUBLICACOESpub_boui=271434407&PUBLICACOESmodo=2)</p> <p>Inventário Florestal Nacional IFN5 (FloreStat_IFN5); ICNF portal (http://www.icnf.pt/portal/florestas/ifn/ifn5/rel-fin)</p> <p>Inventário Florestal Nacional IFN6, preliminary results (IFN6 - Resultados preliminares.pdf); ICNF portal (http://www.icnf.pt/portal/florestas/ifn/ifn6)</p> <p>Boletim-Estatístico-da-Celpe-de-2014 (http://www.celpe.pt/wpcontent/uploads/2016/09/Boletim_WEB_2015.pdf)</p> <p>Relatório-de-Characterização-da-Fileira-Florestal-2014 (http://www.aiff.org.pt/assets/Relatorio-de-Characterizacao-da-Fileira-Florestal-2014-160p-CAPA-3-spread....pdf)</p> <p>Fileira do Pinho: desafios e oportunidades (centroPINUS_JoaoGoncalves dados fileira pinho 2014.pdf); Centro Pinus (http://www.centropinus.org/index.php?lingua=1)</p> <p>Decreto-Lei 16-2009 planos gestão florestal (https://dre.pt/application/dir/pdf1sdip/2009/01/00900/0026800273.pdf); ICNF portal</p>

	(http://www.icnf.pt/portal/icnf/legisl/legislacao/2009/Decree-law-n.o-16-2009-de-14-de-janeiro.-d.r.-n.o-9-serie-i) Normas Técnicas Planos Gestão Florestal, ICNF portal (http://www.icnf.pt/portal/florestas/gf/pgf/resource/doc/manual/normas-tecnPGF-AFN.pdf)
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.3.2	Adequate training is provided for all personnel, including employees and contractors (CPET S6d).
Finding	<p>National Strategy for Forests states that focus on the professionalization and training of the different actors in the forestry sector shows key importance for increasing the competitiveness and, thereby, the development of the sector.</p> <p>ICNF develops training actions aimed at forest operators, foresters, inspectors, forest managers through COTF (Forestry Techniques Operational Centre). This Centre is under direct management of ICNF and has as its main objective to provide training and professional skills enhancement for operators with special emphasis on forest operations, use and maintenance of machinery and equipment, technologies and techniques applied. Training courses always comprise attention to safety, hygiene and health at the workplace. COTF has been operative since 1984 and provides yearly training courses for forest companies, ICNF staff, inspectors, as well as information and promotion activities at schools and other public events.</p> <p>There are training activities promoted by Organizations of Forest Producers (OPF) engaged with Municipalities and local authorities as well as courses undertaken by private entities throughout the country.</p> <p>Portugal has a long tradition of forests activities. Universities networks supply higher education courses in the field of forestry engineering, agronomy, environment engineering, among others. There are, as well, specific courses for field machinery operators.</p> <p>Several professional schools, agroforestry training centres and public institutes have several training courses directed at forestry operators as demonstrated below:</p> <p>http://www.eppovoacao.pt/index.php?page=277</p> <p>http://forestis.pt/pagina,8,8.aspx</p> <p>http://www.drapn.min-agricultura.pt/BDFPA/documentos/Florestas.pdf</p> <p>http://moodle.epafbl.edu.pt/course/view.php?id=339</p> <p>http://academiacomenius.com/course/operador-de-maquinas-multifuncoes-processadora-e-feller/</p> <p>The risk for this indicator is assessed as specified.</p>
Means of Verification	Existing legislation Level of enforcement Training reports Records of BPs' field inspections Training records Interviews with staff Training plans, training records, and records of qualifications

Evidence Reviewed	<p>Estratégia Nacional das Florestas (RCM n.º 6-B/2015 - Diário da República n.º 24/2015, 1º Suplemento, Série I de 2015-02-04); ICNF portal (http://www.icnf.pt/portal/icnf/docref/enf)</p> <p>Centro de Operações e Técnicas Florestais (COTF) - Segurança e Saúde, ICNF portal (http://www.icnf.pt/portal/florestas/gf/cotf/); (http://www.icnf.pt/portal/florestas/gf/cotf/o-q-e/); (http://www.icnf.pt/portal/florestas/gf/cotf/formacao)</p> <p>Catálogo Nacional de Formações (http://www.catalogo.anqep.gov.pt/PDF/QualificacaoReferencialPDF/1065/CA/duplicate/623314_RefCA)</p> <p>http://www.catalogo.anqep.gov.pt/boDocumentos/getDocumentos/522</p>
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
	Indicator
2.3.3	Analysis shows that feedstock harvesting and biomass production positively contribute to the local economy, including employment.
Finding	<p>Statistics for the forest sector in total, show that value added of forest production in Portugal is 1,193million euro (M€) in 2014, with a sustained growth over recent years. Also, 2014 forestry goods production have an estimation of 878.25 M€ of which wood for energy is 55.38 M€ (6%).</p> <p>Data from INE 2012 states that 91% of Portuguese forest sector enterprises have between 1 and 10 workers. Forest industries employ 78,000 people (12% of all Portuguese processing industry, 1.7% of Portuguese employed population) of which 10,600 work in logging companies and 20,800 in the wood industry. Also, the annual turnover of forest sector industries was, in 2012, over 7,392M€ (2,497.6M€ wood and furniture industry, 1,320.4 M€ cork industry and 3,574.6 M€ pulp and paper industry), representing 10% of all the Portuguese processing industry. Despite the recent crisis, the forest sector has maintained its contribution, in macroeconomic terms, in terms of added value.</p> <p>Biomass/Feedstock with origin in Portuguese forest is supplied through domestic supply chains to BP's so economic impact related to feedstock chain from the forest, transportation, processing and BP is local. Also, it is mainly complementary with other wood industries as it is used in their processes of low quality wood (which previously was not exploited or it was burned) or wastes from industrial processes.</p> <p>With all these considerations we can conclude that biomass production contributes positively to the local economy and thus the indicator has been assessed as low.</p>
Means of Verification	Data analysis
Evidence Reviewed	<p>Estratégia Nacional das Florestas (RCM n.º 6-B/2015 - Diário da República n.º 24/2015, 1º Suplemento, Série I de 2015-02-04); ICNF portal (http://www.icnf.pt/portal/icnf/docref/enf)</p> <p>Estatísticas Agrícolas 2015.xls, Instituto Nacional de Estatística (https://www.ine.pt/xportal/xmain?xpid=INE&xpgid=ine_publicacoes&PUBLICACOESpub_boui=271434407&PUBLICACOESmodo=2)</p> <p>Relatório-de-Characterização-da-Fileira-Florestal-2014 (http://www.aiff.org.pt/assets/Relatorio-de-Characterizacao-da-Fileira-Florestal-2014-160p-CAPA-3-spread....pdf)</p>

	Fileira do Pinho: desafios e oportunidades (centroPINUS_JoaoGonçalves dados fileira pinho 2014.pdf); Centro Pinus (http://www.centropinus.org/index.php?lingua=1)
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.4.1	The health, vitality and other services provided by forest ecosystems are maintained or improved (CPET S7a).
Finding	<p>The Operational Program of Forest Health [1] defines a complete action framework comprising implementation assessment reports [2] (diagnosis, identification, monitoring, control, sampling, etc.), informative leaflets (FitoNotícias) [3], Best practices handbook aimed at several steps of forest based operations and a wide diversity of documents and actions aiming to inform and train forest owners and operators on legislation, best practices, precautionary measures among others [4].</p> <p>There are annual implementation reports of the Operational Program of Forest Health as well as assessment reports of more specific action plans, namely, aimed for NMP in coniferous (<i>Bursaphelenchus xylophilus</i>) [5] and Eucalyptus (<i>gonipterus scutellatus</i>) [6].</p> <p>Forest ecosystem services that have a relevant impact on the life and safety of local communities are identified and described in detail in indicators 2.1.1 and 2.1.2, specifically on HCV2 and HCV4. For both of these indicators, low risk was identified, hence it is considered that they are covered by a strong legal and monitoring framework.</p> <p>Statistics from IFN5 shows that the percentage of heavy damaged trees have increased from 1995 to 2005:</p> <p>Pinus Pinaster. From 7% of trees with heavy damage in 1995 to 11% in 2005.</p> <p>Pinus Pinea. From 2% to 7%.</p> <p>Eucalyptus. From 4% to 11%</p> <p>These values lead to the development and application of several sanitary action plans from which the assessment reports data are presented below.</p> <p>From 2008 to April 2013, 22656 plots were monitored and 16545 composite samples were collected (maximum of 5 trees per sample), of which 934 were positive for the presence of NMP. (5.6% of the samples) [Implementation of programs for prospecting, monitoring and control of quarantine organisms – 2013]. From the Report on the Execution of the National Plan for the Control of the Nematode 2014 – During 2014, 12,180 plots were monitored and 9,376 composite samples collected of which 861 were positive for the presence of NMP (9.2% of the samples). All the positive samples detected during the 2014 campaign were located in previously established Intervention Sites (LI) or in their surroundings, essentially in the Central region, Lisbon and Tagus Valley and Alentejo region. This shows that the disease is geographically contained, despite the higher number of positive samples.</p> <p>In the buffer zone (20km from the border with Spain), an area subject to intense monitoring and sampling of the decline in trees, 6,261 samples were collected and analysed, and no positive case of NMP was detected, which allows us to say that this zone remains free of this harmful organism. From the same report: “in 2014, 3,260 traps were installed, resulting in 13,927 monitoring episodes and the identification of a total of 562,310 insects, mainly coleoptera. Of the 8,654 specimens of the vector insect of the NMP, <i>Monochamus galloprovincialis</i>, captured, the presence of NMP was detected in</p>

about 30% of the individuals, mainly in Intervention Sites and their surroundings, located in the District of Coimbra and Leiria, in areas distant from the buffer zone.”

In 2016, 2059 traps were installed, resulting in 5882 monitoring episodes and the identification of a total of 1648 specimens of the NMP vector insect, *Monochamus galloprovincialis*, subjected to laboratory analysis, in which the presence of NMP was detected in 307 insects (about 33% of the individuals), mainly in Intervention Sites and their surroundings. [\[source\]](#)

In 2017, 1560 traps were installed, resulting in 4854 monitoring episodes and the identification of a total of 3145 specimens of the NMP vector insect, *Monochamus galloprovincialis*, subjected to laboratory analysis, in which the presence of NMP was detected in 221 insects, about 7% of the individuals, mostly in Intervention Sites and their surroundings. [\[source\]](#)

The execution reports of the action plan for the control of NMP disease, in the period from 2008 to 2017, show that the spreading of the disease is controlled geographically to the Intervention Zones (ZI). Simultaneously, no positive samples were identified at the buffer zone (ZT), 20km from the border with Spain.

Law enforcement is observed as shown in the examples reviewed [\[6\]](#).

In 2016, SEPNA inspected 24'535 vehicles carrying wood logs and pallets and identified 424 violations (1.7%) from which 295 refer to the lack of NMP manifest (1.2%) [\[Activity Report 2016\]](#). A contract [\[8\]](#) between ICNF and a service provider, referring to the execution of specific analysis to monitor the presence of NMP on coniferous samples shows the effective application of control and monitoring measures.

In 2018 GNR SEPNA carried out an operation aimed at the inspection of vehicles transporting coniferous timber and timber products called “Resina 2018”. GNR monitored 24115 vehicles transporting coniferous material, such as pallets, planks, beams, trunks, plants, woodchips and other derivatives, and 628 violations were detected, of which stand out:

- 583 for unreadable marking of wood, especially on pallets, which atone for the treatment thereof for the elimination of the disease;
- 34 for total absence of marking;
- 4 for lack of a phytosanitary passport, mandatory for the movement of wood

There is a comprehensive online platform available for forest operators to register activities (Forest operations, transport, pine cone harvesting, resin recollection, etc.) performed on coniferous species. This registry is mandatory for all the above operations. [\[9\]](#)

The legal framework related to forest health, pests and diseases is gathered on the ICNF webpage - <http://www.icnf.pt/portal/florestas/prag-doe/leg>. The most relevant pests and diseases are addressed, namely, the ones affecting the wood industry more directly—*Bursaphelenchus xylophilus* and *gonipterus scutellatus*.

Simultaneously, there is an extensive list of communication actions and informative documentation available on the ICNF Forest Health page (<http://www.icnf.pt/portal/florestas/prag-doe/divulg>), showing that efforts were made and are being made in order to promote best practices regarding the improvement of forest health.

	<p>The Program for Rural Development 2014-2020 (PDR2020) has a line of financial support available for operations related to the safeguarding of the forest against biotic and abiotic agents.</p> <p>The scope of this assessment is the impact/effect of forest operations on the indicators assessed, as is written in the SBP standard 1: "Overall evaluation of potential impacts of operations on forest ecosystem health and vitality". Forest operations have a positive impact on the control of forest diseases as is the case of NMP, since one of the control measures is to cut down the plants showing signs of decline.</p> <p>Regarding the examples given in SBP standard 1 for means of verification, Portugal meets them all. There are best practices put in place and promoted through forest associations, municipalities, industrial parties among others. There are monitoring results, examples of law enforcement and implementation reports related to the main diseases and pests. The actual hazard is being managed and through that low risk should be observed.</p>
Means of Verification	<p>Overall evaluation of potential impacts of operations on forest ecosystem health and vitality</p> <p>Assessment of potential impacts at operational level and of measures to minimise impacts</p> <p>Regional Best Management Practices</p> <p>Supply contracts</p> <p>Monitoring results.</p> <p>Experts consultation</p>
Evidence Reviewed	<p>[1] Operational Program of Forest Health, (2014), http://www.icnf.pt/portal/florestas/prag-doe/posf</p> <p>[2] Implementation assessment report, 2015, http://www.icnf.pt/portal/florestas/prag-doe/resource/doc/posf/POSF-Relatorio-execucao-2015-30NOV2016-Aprovado.pdf</p> <p>[3] http://www.icnf.pt/portal/florestas/prag-doe/resource/doc/divul/fitonoticias/Fitonoticia-11-06fev2017.pdf</p> <p>[4] http://www.icnf.pt/portal/agir/boapratice/prag-doenc</p> <p>[5] http://www.icnf.pt/portal/florestas/prag-doe/plan-rel/resourc/doc/rel/nematodo-Relatorio-Anual-Atividade-2014.pdf</p> <p>[6] http://www.icnf.pt/portal/florestas/prag-doe/plan-rel/resourc/doc/rel/gorgulho-Relatorio-anual-atividades_2014</p> <p>[7] http://www.dgsi.pt/jtrc.nsf/c3fb530030ea1c61802568d9005cd5bb/67e0cabe6a3c046580257f1400434c6d?OpenDocument</p> <p>http://www.asae.pt/wwwbase/wwwinclude/ficheiro.aspx?access=1&id=13073</p> <p>https://blook.pt/caselaw/PT/TRE/513612/</p> <p>[8] https://www.parlamento.pt/Documents/XIILEG/Abril_2015/relatorioseginterna2014.pdf</p> <p>[9] http://www.base.gov.pt/base2/rest/documentos/17222</p> <p>[10] http://fogos.icnf.pt/manifesto/TiposLinksEntradaList.asp</p>
Risk Rating	<p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>
	Indicator
2.4.2	Natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b).
Finding	<p>Adding to the findings of indicator 2.4.1 and considering pests and diseases are properly managed as proven by the execution reports of the NMP disease control plan.</p> <p>The assessment report on the National Forests Strategy (2012) [1] shows that after the implementation of the National Strategy Against Fires in 2006, till 2010, the burned area was reduced significantly, representing <u>25% of the overall burned area in the period 2001/2010</u>. Forest area suffering from fires in the same period, also decreased with the</p>

	<p>implementation of this strategic plan, accounting for 15% of the 10-year figures. The former National Forest Strategy subject to this assessment set a maximum threshold of 100 000 ha of burned area per year till 2012, which was accomplished, on average, with 72,669 ha/year from 2006 till 2010.</p> <p>This shows that the forest fire hazard was identified and with the management plan put in place, several performance indicators were met, hence impacts were minimized.</p> <p>Instruments to support the implementation of actions to recover the effects of large forest fires are applied every year in order to manage the risks created by the occurrence of forest fires. [2]</p> <p>There is a Program of Forest Rangers [3] in place to promote several activities related to the prevention of fires, operators and public awareness among others. To assess the effectiveness of the activities performed during the year, several activity reports are available with the listing of operations, statistics analysis and other relevant information. [4]</p> <p>In March 2016, the Action Plan for the Reduction of Fire Occurrences [5] was launched and is embedded in the National Forest Strategy of 2015.</p> <p>The Protection of forest against forest fires is implemented and applied by every municipality and CCDR as can be seen by searching for Regional and Municipal plans approved and in force.</p> <p>Examples of law enforcement:</p> <p>http://www.gnr.pt/comunicado.aspx?linha=2097</p> <p>Forest protection against fires – 2016 from GNR [6]</p> <p>Cooperation between ICNF and the Army [7]</p> <p>Surveillance Actions [8]</p> <p>2012 activities report [9]</p> <p>Considering that effective management activities are put in place regarding the control of forest pests and diseases comprising annual reports and surveillance of forest operators on the compliance with legal requirements, <u>the risk is considered low for management of pests and diseases.</u></p> <p>Regarding <u>forest fires</u>, the lack of updated reports on the application of national plans against forest fires and the continuous incidence of occurrences raises the <u>risk evaluation on this parameter to specified.</u></p>
Means of Verification	<p>Regional Best Management Practices</p> <p>Supply contracts</p> <p>Assessment of potential impacts at operational level and of measures to minimise impacts</p> <p>Monitoring results</p> <p>Regional, publicly available data from a credible third party</p> <p>The existence of a strong legal framework in the region</p> <p>Expert consultation</p> <p>Felling Sanitary Manifest [NMP Manifest]</p>
Evidence Reviewed	<p>[1] Assessment report of the National Forests Strategy (2012), http://www.icnf.pt/portal/icnf/docref/resource/doc/docref/enf-aval</p> <p>[2] http://www.icnf.pt/portal/florestas/dfci/relat/raa/ree-2016</p> <p>[3] http://www.icnf.pt/portal/florestas/dfci/sf1/psf</p> <p>[4] http://www.icnf.pt/portal/florestas/dfci/sf1/psf/rel-doc</p>

	<p>[5] http://www.icnf.pt/portal/florestas/dfci/Resource/doc/PlanoNacionalReducaoNumeroOcorrencias_V1.pdf</p> <p>[6] http://www.prociv.pt/bk/PublishingImages/Lists/Noticias/AllItems/GNR_RESULTADOS%20FINAIS%20DFCI%202016.pdf</p> <p>[7] http://www.icnf.pt/portal/florestas/dfci/Resource/doc/planos-faunos/Relatorio-PLANO-FAUNOS-2016.pdf</p> <p>[8] http://www.gnr.pt/noticias.aspx?linha=6764</p> <p>[9] http://www.icnf.pt/portal/florestas/dfci/Resource/doc/sndfci/apresentacao-sndfci</p>
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

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

	Indicator
2.5.1	Legal, customary and traditional tenure and usage rights of indigenous people and local communities related to the forest are identified, documented and respected (CPET S9).
Finding	<p>Customary Rights are described by the Portuguese Standard for Forest Management (NP4406:2014) as "rights which result from a long series of habitual or customary actions, constantly repeated, which have, by such repetition and by uninterrupted acquiescence, acquired the force of a law within a geographical or sociological unit".</p> <p>Nevertheless, for a habitual action to be admitted as a rule and, for this reason, be considered a Customary Right, it is indispensable that it be supported by generalized and prolonged use (tradition), assuming the presumption that the general consensus (opinion necessitated) approved such action. In this context, attention will be due to elements of local intangible cultural heritage (practices, traditions, etc.) related to the forest, which require respect and preservation.</p> <p>Thereby, the following requirements must be observed for a habitual action to be considered within Customary Right:</p> <ul style="list-style-type: none"> ● It consists of repeated facts, evenly performed for a long period of time; ● Generalized and public practice; and ● Consist of licit facts and not contradictory to the law or public order.

	<p>Cases are, where the custom is considered within the law framework, designated by <i>secundum legem</i>. When the custom completes the law framework, filling in a law deficiency or interpreting it, it is designated as <i>praeter legem</i>.</p> <p>Customary law does not mean that the custom has the force of law, but only a source of law. That is, laws are also based on customs, the "normal use" of society for which the standard was made. Laws must meet what is customary as well as common practices of what is socially and morally right. Hence it is a source of interpretation of norms. It is in this sense that customary law must be understood.</p> <p>The customary right is described in article 348 of the Portuguese civil code. The interpretation of laws is described in article 9 of the Portuguese civil code.</p> <p>In the case of community areas, specific legislation regulates rights of use of common forest areas. (Lei dos Baldios)</p> <p>There are no indigenous people or minorities that need special protection in the country, nor local communities who depend on forest services for their subsistence and for this reason, low risk is found for this indicator.</p>
Means of Verification	<p>Customary usage rights are identified and documented</p> <p>Interviews with local communities and other stakeholders, indicate that their rights are being respected</p> <p>Appropriate mechanisms exist to resolve disputes</p> <p>Agreements exist regarding these rights</p>
Evidence Reviewed	<p>Faro Convention, Republic Assembly Resolution No. 47/2008</p> <p>Constitutional Law No. 1/89 from July 8th</p> <p>Law No. 54/2005 from November 15th</p> <p>Law No. 58/2005 December 29th</p> <p>Law No. 107/2001 September 8th</p> <p>Law No. 173/99 September 21st</p> <p>Law No. 7/2008 February 15th</p> <p>Law No. 2069 April 24th 1954</p> <p>Decree-law 47344/66 November 25th</p> <p>Decree-law 400/82 September 23rd</p>
Risk Rating	<p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>

	Indicator
2.5.2	Production of feedstock does not endanger food, water supply or subsistence means of communities, where the use of this specific feedstock or water is essential for the fulfilment of basic needs.
Finding	<p>Subsistence needs for local communities are assessed as being not applicable for Portugal.</p> <p>Based on the above, it is concluded that there is a low risk of non-compliance with the requirement.</p>
Means of Verification	
Evidence Reviewed	
Risk Rating	<p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>
	Indicator

2.6.1	Appropriate mechanisms are in place for resolving grievances and disputes, including those relating to tenure and usage rights, to forest management practices and to work conditions.
Finding	<p>This indicator serves the purpose to evaluate the efficiency of the legal system implemented in the region under assessment, to deal with and resolve grievances and disputes related to tenure and usage rights, forest management practices and work conditions.</p> <p>Legal framework includes the Portuguese Constitution, the Labour Code and other specific regulations.</p> <p>The detailed procedures, duties and responsibilities of persons involved are defined in both legislation and other legal regulations. Legislation and the justice system provide a route for appeal should people or companies be dissatisfied with the outcome of the dispute resolution process.</p> <p>Land tenure and usage rights are object of the Civil Code, land tenure being included in private property rights on Constitution article 62. These rights include communitarian forests and also Forest Renting/leasing contracts.</p> <p>Disputes about forest management practices would involve forest authorities ICNF in both public and private forests. Specific forest management practices should be included in renting and forest services contracts as harvesting contracts.</p> <p>The disputes related to work conditions shall be resolved according to administrative procedures and labour legislation. Trade unions may help in disputes over work conditions.</p> <p>Portugal has a score of 80 out of 100 on the “Rule of Law” indicator of the World Bank Governance. This indicator “captures perceptions of the extent to which agents have confidence in and abide by the rules of society, and in particular the quality of contract enforcement, property rights, the police, and the courts, as well as the likelihood of crime and violence.” [World Bank Governance]</p> <p>There is also the SBP complaints procedure (https://sbp-cert.org/docs/SBP-Complaints-procedure-v1.1-Jan19%20FINAL.pdf) which provides this important safety net for possible complainant.</p> <p>Considering the positive score achieved in this indicator by Portugal and given that countries with approved RRA have lower scores in the same indicator, low risk is assessed for this indicator.</p>
Means of Verification	Existing legal systems Level of enforcement Forest Best Management Practices Renting and harvesting contracts
Evidence Reviewed	Labour Code: Law No. 7/09 12/02 (http://www.act.gov.pt/(pt-PT)/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx) Portuguese Constitution Civil Code: http://www.pgdlisboa.pt/Laws/Law_mostra_articulado.php?nid=775&tabela=Laws World Bank Governance: http://info.worldbank.org/governance/wgi/index.aspx#reports
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.7.1	Freedom of Association and the effective recognition of the right to collective bargaining are respected.
Findin g	<p>Portugal signed the ILO fundamental conventions, which includes the C87 Freedom of Association and Protection of the Right to Organize Convention (1948) in 1977 and C98 Right to Organize and Collective Bargaining Convention (1949) in 1964. This right is included in the Portuguese constitution in article 56. The majority of working activities are covered by an annual working collective convention, which includes the forest sector.</p> <p>International Trade Union Confederation (IUTC) ranks 139 countries against 97 internationally recognised indicators to assess where workers' rights are best protected, in law and in practice. Portugal has a rating of 3, from 1 to 5+, in the ITUC Global Rights Index 2014. This score is given for countries where:</p> <p>(There are) "Regular violation of rights. The government and/or companies are regularly interfering in collective labour rights. There are deficiencies in laws and/or certain practices which make frequent violations possible."</p> <p>The Authority directly involved in employment rights and conditions is Work Conditions Authority (ACT) but for many reasons other authorities are related to the issue, like Immigration and Borders Services (SEF) social security services or even tax services. All of them can make inspections on different issues related to work, joined by police authorities like GNR – National Republican Guard and PSP-Public Security Police.</p> <p>ACT has strategic Plans for Agriculture and Forest activities and also does integrated inspections with Spanish authorities for agriculture and forestry activities. A recent notice states that ACT acquired a drone to help agriculture and forestry inspections.</p> <p>Inspective activities of ACT and SEF result in penalties or suspensions when illegal situations are found.</p> <p>There were no law violations identified on the right of freedom of association and collective bargaining in the Portuguese forest sector.</p> <p>According to the available information this indicator is classified as low risk.</p>
Means of Verific ation	<p>Legislation Level of enforcement Portuguese constitution Regional, publicly available data from a credible third party Publicly available information (News and media)</p>
Eviden ce Revie wed	<p>Agriculture, Food and Forest Union: http://www.setaa.pt/index.php/Geral/</p> <p>Boletim do Trabalho e Emprego [Work and Employment Bulletin]: http://bte.gep.msess.gov.pt/ http://bte.gep.msess.gov.pt/completos/2016/bte4_2016.pdf</p> <p>WWW.ILO: http://www.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO::P13100_COMMENT_ID,P13100_LANG_CODE:3253858,en:NO</p> <p>Overview of ILO convention ratifications by Portugal: http://www.ilo.org/public/portugue/region/eurpro/lisbon/html/portugal_convencoes_numero_pt.htm</p> <p>ITUC Global RIGHTs Index The woRld's woRst CoUnTRles foR workers: http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf</p>

	<p>Labour Code• Law n. ° 7/09 12/02 and updates like L69/13, of 30/08 includes collective convention http://www.act.gov.pt/(pt-PT)/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx</p> <p>Portuguese Constitution</p> <p>Government sources:</p> <p>SEF Statistical Annual reports: http://sefstat.sef.pt/relatorios.aspx SEF Inspective news about forest sector: http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=7018 http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=6802</p> <p>ACT Annual Reports: http://www.act.gov.pt/(ptPT)/SobreACT/DocumentosOrientadores/RelatorioActividades/Paginas/default.aspx</p> <p>News about ACT inspective work including forest: http://www.act.gov.pt/(ptPT)/Itens/Noticias/Paginas/ACTeInspe%C3%A7%C3%A3odoTrabalhodeEspanhaema%C3%A7%C3%B5esconjuntas.aspx</p> <p>ACT Strategic Plan for Agriculture and Forestry Activities: http://www.act.gov.pt/(ptPT)/Campanhas/Campanhasrealizadas/Trabalho_Agricola_Florestal/Documents/Relat%C3%B3rio%20-%20Plano%20a%C3%A7%C3%A3o%20setor%20agr%C3%ADcola%20e%20florestal.pdf</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
	Indicator
2.7.2	Feedstock is not supplied using any form of compulsory labour.
Findings	<p>Portugal ratified the convention against forced labour (No.29) in 1956.</p> <p>Portuguese legislation is applied against any form of compulsory labour in accordance with Article 160 of the Criminal Code, one who offers, gives, servicemen, accepts calls, transports, harbours or receives a person for the purpose of exploitation, including sexual exploitation, labour exploitation, begging, slavery, harvest of organs or other exploitation by criminal activities and he / she has abused the authority resulting from a hierarchical relationship of dependency (whether financial, family or work related) is punished with imprisonment of three to ten years. Source: § (Article 160 of Decree-Law No. 400/82 Penal Code amended by Law No. 59/2007 and Law No. 60/2013).</p> <p>International Trade Union Confederation (IUTC) ranks 139 countries against 97 internationally recognised indicators to assess where workers' rights are best protected, in law and in practice. Portugal has a rating of 3, from 1 to 5+, in the ITUC Global Rights Index 2014. This score is given for countries where:</p> <p>(There are) "Regular violation of rights. The government and/or companies are regularly interfering in collective labour rights. There are deficiencies in laws and/or certain practices which make frequent violations possible."</p>

	<p>ACT has strategic Plans for Agriculture and Forest activities and also does integrated inspections with Spanish authorities for agriculture and forestry activities. A recent notice states that ACT acquired a drone to help agriculture and forestry inspections.</p> <p>Inspective activities of ACT and SEF result in penalties or suspensions when illegal situations are found.</p> <p>Nevertheless, in forestry no evidence was found confirming the existence of risks of compulsory and/or forced labour in Portugal.</p> <p>According to the available information this indicator is classified as low risk.</p>
Means of Verification	<p>Legislation</p> <p>Level of enforcement</p> <p>Regional, publicly available data from a credible third party</p> <p>Publicly available information (News and media)</p>
Evidence Reviewed	<p>III National Plan to Prevent and Combat Trafficking of Human Beings 2014-2017 at http://www.igualdade.gov.pt/images/stories/documentos/legislacao/legislacao/Planos_Nacionais/2014-2017-iii-pnpc-tsh-en.pdf</p> <p>Observatory on Trafficking of Human Beings: http://www.otsh.mai.gov.pt/Recursos/Pages/default.aspx</p> <p>Reports of Observatory on Trafficking of Human Beings: 2015; 2014; 2013; 2012; 2011</p> <p>Overview of ILO convention ratifications by Portugal: http://www.ilo.org/public/portugue/region/eurpro/lisbon/html/portugal_convencoes_numero_pt.htm</p> <p>ITUC Global RIGHTS Index The woRld's woRst CoUnTRles foR workers: http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf</p> <p>Government sources:</p> <p>SEF Statistical Annual reports: http://sefstat.sef.pt/relatorios.aspx</p> <p>SEF Inspective news about forest sector: http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=7018 http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=6802</p> <p>ACT Annual Reports: http://www.act.gov.pt/(ptPT)/SobreACT/DocumentosOrientadores/RelatorioActividades/Paginas/default.aspx</p> <p>News about ACT inspective work including forest: http://www.act.gov.pt/(ptPT)/Itens/Noticias/Paginas/ACTeInspe%C3%A7%C3%A3odoTrabalhodeEspanhaema%C3%A7%C3%B5esconjuntas.aspx</p> <p>ACT Strategic Plan for Agriculture and Forestry Activities: http://www.act.gov.pt/(ptPT)/Campanhas/Campanhasrealizadas/Trabalho_Agricola_Florestal/Documents/Relat%C3%B3rio%20-%20Plano%20a%C3%A7%C3%A3o%20setor%20agr%C3%ADcola%20e%20florestal.pdf</p>
Risk Rating	<p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>

2.7.3	Feedstock is not supplied using child labour.
Finding	<p>In Portugal the minimum age for employment is 16 years. An under-16 minor cannot be used to carry out a paid activity delivered with autonomy unless he / she has completed compulsory education or is enrolled and attending secondary education, and it is light work. This light work should consist of simple tasks and is not likely to adversely affect the physical integrity, safety and health, school attendance, or their moral, psychological, intellectual, cultural and physical well-being. (Art. 66-83 of the Labour Code) 2009.</p> <p>Portugal ratified Minimum Age Convention (1973) C138 in 1989 and the convention C182 Worst Forms of Child Labour Convention (1999) in 2000.</p> <p>International Trade Union Confederation (IUTC) ranks 139 countries against 97 internationally recognised indicators to assess where workers' rights are best protected, in law and in practice. Portugal has a rating of 3, from 1 to 5+, in the ITUC Global Rights Index 2014. This score is given for countries where: (There are) "Regular violation of rights. The government and/or companies are regularly interfering in collective labour rights. There are deficiencies in laws and/or certain practices which make frequent violations possible."</p> <p>UNICEF report 2012 "Measuring Child Poverty was rating 14.7% of Portuguese children below 16 years of age as below the "poverty line".</p> <p>Robust data about child labour are not recent, as the last official inquiry report is from 2001, and the results were not positive as 4.1% of children in the study were affected by child labour (CNAsti), with half of this proportion related to agriculture.</p> <p>2015: FSC Portugal CNRA report states "Despite evidence of some (remaining) cases of child labour, there is evidence that this problem is neither structural nor of large size. No evidence found of cases of child labour in the forest sector. The national CWRA explicitly mentions "child labour in the forest sector in Portugal is very low". There is evidence that the number of minors working illegally is rather insignificant.</p> <p>Authority directly involved in employment rights and conditions is Work Conditions Authority (ACT) but for many reasons other authorities are related to the issue, like Immigration and Borders Services (SEF) social security services or even tax services. All of them can make inspections on different issues related to work, joined by police authorities like GNR – National Republican Guard and PSP-Public Security Police.</p> <p>ACT has strategic Plans for Agriculture and Forest activities and also does integrated inspections with Spanish authorities for agriculture and forestry activities. A recent notice states that ACT acquired a drone to help agriculture and forestry inspections. Inspective activities of ACT and SEF result in penalties or suspensions when illegal situations are found.</p> <p>Nevertheless, based on the available information no evidence was found confirming the existence of risks of child labour in forestry in Portugal.</p>
Means of Verification	<p>Legislation</p> <p>Level of enforcement</p> <p>Regional, publicly available data from a credible third party</p> <p>Publicly available information (News and media)</p>
Evidence Reviewed	<p>Legislation:</p> <p>Labour Code•:Law No. 7/09 of 12/02 http://www.act.gov.pt/(pt-PT)/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx</p> <p>Law No. 47/2012, of 29/08 at http://www.cnasti.pt/cnasti/documentos/1403451265.pdf</p>

	<p>Decree Republic President 28/2000 1/06 at http://www.ilo.org/public/portugue/region/eurpro/lisbon/pdf/conv_182.pdf</p> <p>Republic Assembly Resolution 11/98 at http://www.ilo.org/public/portugue/region/eurpro/lisbon/pdf/conv_138.pdf</p> <p>Government sources: SEF Statistical Annual reports: http://sefstat.sef.pt/relatorios.aspx SEF Inspective news about forest sector: http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=7018 http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=6802</p> <p>ACT Annual Reports: http://www.act.gov.pt/(ptPT)/SobreACT/DocumentosOrientadores/RelatorioActividades/Paginas/default.aspx</p> <p>News about ACT inspective work including forest: http://www.act.gov.pt/(ptPT)/Itens/Noticias/Paginas/ACTeInspe%C3%A7%C3%A3odoTrabalhodeEspanhaema%C3%A7%C3%B5esconjuntas.aspx</p> <p>ACT Strategic Plan for Agriculture and Forestry Activities: http://www.act.gov.pt/(ptPT)/Campanhas/Campanhasrealizadas/Trabalho_Agricola_Florestal/Documents/Relat%C3%B3rio%20-%20Plano%20a%C3%A7%C3%A3o%20setor%20agr%C3%ADcola%20e%20florestal.pdf</p> <p>Other Sources: Overview of ILO convention ratifications by Portugal: http://www.ilo.org/public/portugue/region/eurpro/lisbon/html/portugal_convencoes_numero_pt.htm</p> <p>Social characterization of aggregates Portuguese Family with Children of School Age http://www.cnasti.pt/cnasti/documentos/1403450788.pdf</p> <p>UNICEF Innocenti Research Centre (2012), 'Measuring Child Poverty: New league tables of child poverty in the world's rich countries', Innocenti Report Card 10, UNICEF Innocenti Research Centre, Florence at ITUC Global RIGhTs Index The woRld's woRsT CoUnTRles foR workers: http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
	Indicator
2.7.4	Feedstock is not supplied using labour which is discriminated against in respect of employment and occupation.
Finding	<p>Protection against discrimination in labour is included in the Portuguese constitution (Article 55), and labour code. Portugal ratified the ILO convention about discrimination on work and career C111 (1958) in the year 1959. Also, the convention on equal remuneration C100 was ratified in the year 1966.</p> <p>Portugal is well positioned in the majority of international reports:</p> <ul style="list-style-type: none"> ● Corruption Perception Index scores 63 meaning low perceived level of corruption; ● Worldwide Governance Indicators (WGI) from 73.3 to 84.13 (1-100points)

	<p>The WGI reports six aggregate governance indicators for over 200 countries and territories over the period 1996-2014, covering i) Voice and Accountability, ii) Political Stability and Absence of Violence/Terrorism, iii) Government Effectiveness, iv) Regulatory Quality, v) Rule of Law, and vi) Control of Corruption.</p> <ul style="list-style-type: none"> • Free country on press, net, political rights and civil liberties. <p>On the other hand Portugal (including human rights, illegal logging, forest and timber) is not listed in alarming reports or indexes such as:</p> <ul style="list-style-type: none"> • Committee to Protect Journalists Impunity Index; • Human Rights Watch; • Global Witness • Chatham House • Amnesty International <p>Some observations were found about discrimination against women in jobs and remuneration and gender pay gap (see below Direct Request (CEACR) - adopted 2014, published 104th ILC session (2015) Equal Remuneration Convention, 1951 (No. 100) – Portugal).</p> <p>Also, discrimination episodes were found against Roma and LGB (see below Amnesty International 2014/2015 report The State of the World’s Human Rights) but not related to work activities.</p> <p>Authority directly involved in employment rights and conditions is Work Conditions Authority (ACT) but for many reasons other authorities are related to the issue, like Immigration and Borders Services (SEF) social security services or even tax services. All of them can make inspections on different issues related to work, joined by police authorities like GNR – National Republican Guard and PSP – Public Security Police.</p> <p>ACT has strategic Plans for Agriculture and Forest activities and also does integrated inspections with Spanish authorities for agriculture and forestry activities. A recent notice states that ACT acquired a drone to help agriculture and forestry inspections.</p> <p>Inspective activities of ACT and SEF result in penalties or suspensions when illegal situations are found.</p> <p>Based on the available information, no evidence was found that confirms the existence of risks of discrimination in respect to employment and occupation in forestry in Portugal.</p>
<p>Means of Verification</p>	<p>Legislation Level of enforcement Regional, publicly available data from a credible third party Publicly available information (News and media)</p>
<p>Evidence Reviewed</p>	<p>Legislation:</p> <ul style="list-style-type: none"> • Portuguese Constitution • Labour Code • Law n. ° 7/09 of 12/02 http://www.act.gov.pt/(pt-PT)/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx • Dec-Law 42520/1959 23/09 at http://www.ilo.org/public/portugue/region/eurpro/lisbon/pdf/conv_111.pdf • Dec-Law 47 302/1966 of 04/11 at http://www.ilo.org/public/portugue/region/eurpro/lisbon/pdf/conv_100.pdf <p>Other sources:</p> <ul style="list-style-type: none"> • Transparency International http://www.transparency.org/cpi2015#map-container • UN Sanctions List at: https://www.un.org/sc/suborg/en/sanctions/un-sc-consolidated-list • World Bank: Worldwide Governance Indicators

	<p>http://info.worldbank.org/governance/wgi/index.aspx#countryReports</p> <ul style="list-style-type: none"> •Freedom house: https://freedomhouse.org/report/freedom-world/freedom-world-2016 •Committee to Protect Journalists https://www.cpj.org/reports/2014/04/impunity-index-gettingaway-with-murder.php •Human Rights Watch: http://www.hrw.org/world-report/2015 •Global Witness: www.globalwitness.org <p>Chatham House Illegal Logging Indicators Country Report Card http://www.illegal-logging.info</p> <ul style="list-style-type: none"> •Amnesty International 2014/2015 report: https://www.amnesty.org/en/documents/pol10/0001/2015/en/ •Direct Request (CEACR) - adopted 2014, published 104th ILC session (2015) Equal Remuneration Convention, 1951 (No. 100) – Portugal http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:13100:0::NO::P13100_COMMENT_ID:3186668 •Overview of ILO convention ratifications by Portugal: http://www.ilo.org/public/portugue/region/eurpro/lisbon/html/portugal_convencoes_numero_pt.htm <p>SEF Statistical Annual reports: http://sefstat.sef.pt/relatorios.aspx SEF Inspective news about forest sector: http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=7018 http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=6802</p> <p>ACT Annual Reports: http://www.act.gov.pt/(ptPT)/SobreACT/DocumentosOrientadores/RelatorioActividades/Paginas/default.aspx</p> <p>News about ACT inspective work including forest: http://www.act.gov.pt/(ptPT)/Itens/Noticias/Paginas/ACTeInspe%C3%A7%C3%A3odoTrabalhodeEspanhaema%C3%A7%C3%B5esconjuntas.aspx</p> <p>ACT Strategic Plan for Agriculture and Forestry Activities: http://www.act.gov.pt/(ptPT)/Campanhas/Campanhasrealizadas/Trabalho_Agricola_Florestal/Documents/Relat%C3%B3rio%20-%20Plano%20a%C3%A7%C3%A3o%20setor%20agr%C3%ADcola%20e%20florestal.pdf</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.7.5	Feedstock is supplied using labour where the pay and employment conditions are fair and meet, or exceed, minimum requirements.
Findings	<p>Minimum wage is included in the Portuguese constitution (Article 59), and labour code. Portugal ratified the ILO convention on minimum wage C131 (1970) in the year 1981. Also, the convention on salary protection C95 was ratified in the year 1981. Payment and employment conditions are included and are updated in the labour code. The Authority directly involved in employment conditions is Work Conditions Authority (ACT) but for many reasons other authorities are related to the issue, like Immigration and Borders Services (SEF) social security services or even tax services. All of them can make inspections on different issues related to work, joined by police authorities like GNR-National Republican Guard and PSP-Public Security Police.</p> <p>ACT has strategic Plans for Agriculture and Forest activities and also does integrated inspections with Spanish authorities for agriculture and forestry activities. A recent notice states that ACT acquired a drone to help agriculture and forestry inspections.</p>

	<p>Inspective activities of ACT and SEF result in penalties or suspensions when illegal situations are found.</p> <p>According to the available information on employment conditions, there is a legal framework in the country, and there are legal authorities to enforce legislation. It is therefore considered that Portugal has a low risk that pay and employment conditions are not fair and do not meet minimum requirements.</p> <p>Low risk.</p>
Means of Verification	<p>Legislation</p> <p>Level of enforcement</p> <p>Regional, publicly available data from a credible third party</p> <p>Publicly available information (News and media)</p>
Evidence Reviewed	<p>Legislation:</p> <ul style="list-style-type: none"> •Portuguese Constitution •Labour Code•: Law No. 7/09 of 12/02 <p>http://www.act.gov.pt/(pt-PT)/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx</p> <p>Dec-Law: 77/81 of 19/06 at http://www.ilo.org/public/portugue/region/eurpro/lisbon/pdf/conv_131.pdf</p> <p>Dec-Law: 88/81 of 14/07 at http://www.ilo.org/public/portugue/region/eurpro/lisbon/pdf/conv_95.pdf</p> <p>Government sources:</p> <p>SEF Statistical Annual reports: http://sefstat.sef.pt/relatorios.aspx</p> <p>SEF Inspective news about forest sector: http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=7018 http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=6802</p> <p>ACT Annual Reports: http://www.act.gov.pt/(ptPT)/SobreACT/DocumentosOrientadores/RelatorioActividades/Paginas/default.aspx</p> <p>News about ACT inspective work including forest: http://www.act.gov.pt/(ptPT)/Itens/Noticias/Paginas/ACTeInspe%C3%A7%C3%A3odoTrabalhodeEspanhaema%C3%A7%C3%B5esconjuntas.aspx</p> <p>ACT Strategic Plan for Agriculture and Forestry Activities: http://www.act.gov.pt/(ptPT)/Campanhas/Campanhasrealizadas/Trabalho_Agricola_Florestal/Documents/Relat%C3%B3rio%20-%20Plano%20a%C3%A7%C3%A3o%20setor%20agr%C3%ADcola%20e%20florestal.pdf</p>
Risk Rating	<p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>
	Indicator
2.8.1	Appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12).
Finding	In Portugal, health and safety at work is heavily regulated in accordance with the legislation presented, which covers all forestry and forestry-related activities, namely the requirements for collective and personal protective equipment, the use/verification of forestry machinery and the use of plant protection products.

ACT (Working Conditions Authority) promoted the development of the Strategic Action Plan for Agriculture, livestock and Forestry sectors from 2012 to 2015 producing the assessment report for this initiative ([see report](#)). From the execution of this plan 6 informative leaflets were produced as well as 8 instruments for the application of the respective law framework (checklists). The plan involved the participation of several social partners as well as public partners which can be consulted in the report. An estimated 9000 employers and employees were reached throughout the development of this plan as well as 560 associative managers and technicians.

The plan also comprised an inspective component materialized in 1700 inspections over 3 years reaching 10 000 workers.

The [National Strategic Plan for The Health and Safety at Work 2015-2020](#) was launched in May 2016 and it establishes the following strategic objectives:

- i) Promote the well-being at work and competitiveness of companies;
- ii) Decrease work accidents by 30% and the incidence rate of work accidents by 30%
- iii) Decrease the risk factors related to occupational diseases.

In order to pursue the proposed objectives, a total of 31 measures will be carried out.

Data from INE (National Statistics Institute) shows that overall fatal accidents at work decreased from 2011 to 2014 (196 to 160 deaths), as well as fatal accidents in the forestry, agriculture and fishing sector (29 to 25) in the same period. [1]

The primary sector accounts for around 20% of fatal accidents occurring in one year in Portugal and employs around 7% of the employed population.

More recent numbers from ACT (Work Authority) show 16 fatal accidents in 2016 in the primary sector, the lowest number in 10 years. This shows a trend of reduction.

ACT reported 5 severe work accidents occurring in the Forestry sector in 2014, 10 in 2015 and 6 in 2016. The number of fatal accidents reported was 2, 4 and 8 respectively, for the same period.

Law No. 98/2009, September 4th, governs the regime for the repair of work accidents and occupational disease.

([http://www.act.gov.pt/\(pt-PT\)/Centrolnformacao/Estatistica/Paginas/default.aspx](http://www.act.gov.pt/(pt-PT)/Centrolnformacao/Estatistica/Paginas/default.aspx))

Assessment of law enforcement

Authorities with specific jurisdiction for licensing and inspecting the provisions of health and safety at work legislation in Portugal are:

– ACT (Autoridade para as condições do Trabalho) [Working Conditions Authority];

	<ul style="list-style-type: none"> – DGS (Direcção Geral de Saúde) [Directorate-General of Health]; – ANPC (Autoridade Nacional de Protecção Civil) [National Civil Protection Authority]. <p>All companies must provide an annual report to the Ministério da Solidariedade e Segurança Social [Ministry for Solidarity and Social Security], which is registered in Annex D, with:</p> <ul style="list-style-type: none"> - Quantity and severity of accidents at work and occupational diseases; – Training hours related to OSH (occupational safety and health); – Organization of OSH services; – Risk identification, assessment, and control; – Periodic and occasional aptitude tests; <p>The ACT has recently developed a set of initiatives and projects aimed at the forestry sector. These consist of awareness and training in the most significant risks in forestry.</p> <p>The report “Relatório de Actividades ACT” [‘ACT Activities Report’] confirms that there has been a decrease in accidents at work in the primary sector.</p> <p>Nevertheless, the occurrence of work accidents in the primary sector are still considerably high when compared to other sectors. For this reason, specified risk is assessed for this indicator.</p>
Means of Verification	<p>Accredited professional courses (e.g. chainsaws, machinery operator, phytopharmaceuticals applicator) card and/or specific certificates of training sessions.</p> <p>Records of H&S procedures and Personal Protective Equipment distribution by the Organization.</p> <p>Record of machinery safety tools and equipment on original documental register.</p>
Evidence Reviewed	<p>[1] https://www.ine.pt/xportal/xmain?xpid=INE&xpgid=ine_indicadores&indOcorrCod=0006896&contexto=bd&selTab=tab2 ACT activity reports: http://www.act.gov.pt/(pt-PT)/SobreACT/DocumentosOrientadores/RelatorioActividades/Paginas/default.aspx Law No.7/2009, February 12th – Labour code of 2009 (articles 281 to 284) Law No. 102/2009, September 10th – Legal regime for the promotion of health and safety at work. Special attention shall be given to the articles related to the obligations of employers and employees (article No. 15 to 17) and to the operation of the health and safety service at work (article 97 to 110) Law No. 3/2014, January 28th – Second modification of law No. 102/2009, September 10th, which approves the legal regime for the promotion of health and safety at work as well as the second modification of Decree-law No. 116/97, May 12th, which brings to the internal legal order, Council Directive No.93/103/CE, related to the minimum prescriptions of health and safety at the workplace and aboard fishing vessels. Ordinance No. 255/2010, May 5th, establishes the requirement template for the authorization of common service, external service and exemption of the internal service of health and safety at the workplace. Ordinance No. 275/2010, May 19th, establishes the applicable fees in the processes for the authorization of Health and Safety at Work services. Ordinance No.71/ 2015, March 10th, approves the template of the health fitness exam document.</p>

Decree-law No.2/82, May 5th, determines the obligation to report every case of occupational disease to the Caixa Nacional de Seguros de Doenças Profissionais [NATIONAL PROFESSIONAL DISEASE INSURANCE FUND].

Decree-law No.159/99, May 11th, modified by Decree-law No. 382A/99, September 22nd, rules the mandatory insurance against workplace accidents for independent workers.

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

Ordinance 137/94, March 8th,

Approves reporting templates and maps relating to occupational accidents:

[http://www.act.gov.pt/\(pt](http://www.act.gov.pt/(pt)

PT)/Legislacao/LegislacaoNacional/Paginas/default.aspx

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Decree-Law No. 266/2007, of July 24th - establishes the standards of health protection of workers against the risks of exposure to asbestos during work.

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

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Waste	6,574	6,463	6,383	6,238	6,046	5,946	5,808	5,741	5,539	5,362	5,227	4,884	4,728	4,667	6. Other	NO																										
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cover, which was between 4 and 7 per cent in 1870, grew in one century to cover more than 30 per cent of the mainland territory. [1]

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

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

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

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

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

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

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

Habitat 4020 Temperate Atlantic wet heaths with *Erica ciliaris* and *Erica tetralix*: No threats or pressures of high importance related to forestry and silvicultural activities. Despite the conversion of this habitat being considered as inadequate, in the time span of the assessment the conservation trend was considered stable.

Habitat 3170 Mediterranean temporary ponds: No threats or pressures of high importance related to forestry and silvicultural activities.

	<p>Habitat 5140 Cistus palhinhae formations on maritime wet heaths: No threats or pressures related to forestry and silvicultural activities. Main threats and pressures related to overuse for recreational activities, sports and leisure.</p> <p>Habitat 4010 Northern Atlantic wet heaths with Erica tetralix: No threats or pressures related to forestry and silvicultural activities.</p> <p>Habitat 4060 Alpine and Boreal heaths: Favourable status assessed and no threats or pressures of high importance related to forestry and silvicultural activities.</p> <p>Habitat 4090 Endemic oro-Mediterranean heaths with gorse: Favourable status assessed and no threats or pressures related to forestry and silvicultural activities.</p> <p>Habitat 1150 Coastal lagoons: No threats or pressures related to forestry and silvicultural activities.</p> <p>Taking into account the above examples, it is possible to consider that forestry activities do not represent a high importance threat or pressure for wetlands conservation and protection.</p> <p>Considering the same report, regarding peatlands:</p> <p>Habitat 7140 Transition mires and quaking bogs: No threats or pressures related to forestry and silvicultural activities.</p> <p>Habitat 7150 Depressions on peat substrates of the Rhynchosporion: No threats or pressures related to forestry and silvicultural activities.</p> <p>Through the revision of the information above and the interpretation of the positive trends showed by the Portuguese forest regarding the sequestration of carbon, the risk for this indicator is considered as low.</p>
Means of Verification	<p>Maps, Web Pages</p> <p>Procedures and records</p> <p>Regional, publicly available data from a credible third party</p> <p>The existence of a strong legal framework in the region</p> <p>Interviews with experts</p>
Evidence Reviewed	<p>[1] http://www.inia.v.pt/fotos/editor2/5_solo_estrategia_nacional_alberto_gomes.pdf</p> <p>[2] http://www.icnf.pt/portal/florestas/ifn/resource/ficheiros/ifn/ifn6-res-prelimv1-1</p> <p>[3] http://www.tcontas.pt/pt/actos/rel_auditoria/2012/2s/audit-dgtrc-rel035-2012-2s.pdf</p> <p>[4] National Report on the Implementation of Habitats Directive 2013 http://cdr.eionet.europa.eu/Converters/run_conversion?file=pt/eu/art17/envuc2hfw/PT_habitats_reports.xml&conv=350&source=remote</p> <p>United Nations Framework on Climate Change, National Inventory Submissions 2019 https://apambiente.pt/_zdata/Inventario/May2019/NIR_global2019(UNFCCC).pdf</p>
Risk Rating	<p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>
	Indicator
2.9.2	Analysis demonstrates that feedstock harvesting does not diminish the capability of the forest to act as an effective sink or storage of carbon over the long term.
Finding	Additionally, to the references on 2.9.1.

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

	Indicator
2.10.1	Genetically modified trees are not used.
Finding	<p>In Portugal there is not a specific legal framework for GMO trees, but for all vascular plants. This legislation does not prohibit commercial use of GMO plants which is legal in the country since 1999. However, only corn (maize) is cultivated (around 6% of the total production).</p> <p>No recent trial of GM trees in the country has been found. The only related news was from 1997 when Stora Enso trialled a modified variety of Eucalyptus globulus, which was concluded in 2001.</p> <p>The company (Stora Enso) is no longer in Portugal but is still an industrial global pulp and paper player with interests in GMO.</p> <p>A low risk conclusion is justified because there was no interest shown for GMO use in the forestry sector.</p>
Means of Verification	<p>List of species used.</p> <p>EU Register of authorised GMOs http://ec.europa.eu/food/dyna/gm_register/index_en.cfm</p>

Evidence Reviewe d	<ul style="list-style-type: none"> •DL 55/2015 of 17/04 http://apambiente.pt/zdata/Politic/MGM/DL%2055_2015.pdf •DL 72/2003 of 10/04 (http://apambiente.pt/zdata/Politic/OGM/DL_72_2003.pdf) •APA-Agência Portuguesa de Ambiente at webpage: http://apambiente.pt/index.php?ref=16&subref=85&sub2ref=430 •DGAV- Direcção Geral de Alimentação e Veterinária webpage: http://www.dgv.minagricultura.pt/portal/page/portal/DGV/genericos?generico=3665233&cboui=3665233 •Plataforma Transgénicos Fora at http://stopogm.net/ensaios •EU Register of authorised GMOs http://ec.europa.eu/food/dyna/gm_register/index_en.cfm •Global Forest Registry: http://www.globalforestregistry.org/
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

Indicator	Draft RRA v6.0	Comments
1.1.2	On the above background, the risk related to the traceability of feedstock back to the supply base is evaluated to be specified due to the lack of compliance of forest operators in delivering the mandatory Felling Manifest for other species other than coniferous.	From the findings it is not clear that the only document which clearly links the material back to the forest stand is the felling manifest. There is a number of documents mentioned but the level of assurance that the material can be traced back to the stand is not clear.
1.2.1	Real Estate Cadastre...	Not clear if/how this is applicable to forestry
1.2.1	Conservatory of the land registry...	This section seems to be about buildings, not very relevant for forestry, unless the land is not part of the building
1.3.1	Since the scope of this National Risk Assessment is the primary feedstock of raw material originating in Portuguese Mainland, the EUTR requirements are not applicable, since they aim to verify the legality of imported wood to the EU market.	EUTR also covers wood placed in EU market from EU forest.
1.4.1	Income Taxes (IRS & IRC)	There is no information about whether there are any analyses of how much wood is sold without invoice and thus avoiding tax.
2.1.1	Risk Conclusion HCV1: The identification of precise HCV attributes might not fall under the scope of these assessments, so specified risk is considered.	Not sure this makes any sense
2.1.1	Risk Conclusion HCV3	From the description below it is not clear why this is specified risk and what kind of stands or areas are the most vulnerable
2.1.3	The definition of natural forest...	Why is natural forest definition mentioned in the RA? There is no reason for that as the indicator works with forest to plantation
2.1.3	<ul style="list-style-type: none"> - Conversion of forest cover is possible in Portugal, although previous authorization by ICNF is mandatory. - Several legal mechanisms and monitoring practices are put in place in order to control forestry activities in sensitive areas, comprising protected tree species. - The exotic tree species most relevant in Portugal is the Eucalyptus Globulus as is described above. The area of Eucalyptus settlements is constrained and thereby, conversions from other species will not be possible. - The change of land use is limited. 	How do any of these assure that biomass will not contain any material from converted plantations or that the wood is not extracted from sites that will be converted to plantations after the harvest?

2.2.6	PROF, in some regions, also defines a maximum threshold for clear cutting of 10ha.	In Portuguese implemented legislation there is not a clear and effective legal tool over all the territory, exceptions being the Northern regions, where 10 hectares is defined as the maximum clearcutting area as defined in Regional Forest Plans. Also, some Municipalities may have municipal regulations about clearcutting fellings. It is therefore considered there are specified risks that feedstock is sourced from forests when clear cuttings are done over a specific size area. This specific area is defined regionally by each Regional Forest Plan (PROF), as the maximum clearcutting area or the size of even aged monospecific forest stand.
2.3.2	The risk for this indicator is assessed as specified.	There is justification missing for the specified risk in this indicator
2.4.1		It would be good to consider also the Statistics from IFN5 (last complete inventory data available) shows that percentage of heavy damaged trees have increased from 1995 to 2005: Pinus Pinaster. From 7% of trees with heavy damage in 1995 to 11% in 2005. Pinus Pinea. From 2% to 7%. Eucalyptus. From 4% to 11%
2.5.1		The finding does not seem to address the customary right to entry inside forest properties, and even the collection of private natural resources of free use like mushrooms or aromatic plants. This customary right does not include licensed fenced properties for cattle or big game hunting zones. The rights of collection of mushrooms, aromatic and medicinal plants still have a lack of legislation as the 2009 Forest Code was revoked in 2012. This Code was giving more rights for these natural resources to land owners. Conflicts may exist between land owner rights based on the private right defence against the customary rights of accessing and free use collection, as no specific legislation was updated about this issue. These conflicts may become more relevant where resources are easy to steal, like pine cones or other NTFP-Non Timber Forest Products.
Indicator nº	Comment from stakeholder	
1.1.2	Despite the fact that Portugal has legislation in order to trace back the feedstock, like the ones that are correctly described in the RRA, one verifies a lack of application of the harvesting manifest (described as felling manifest in RRA), since there is not a proper verification by ICNF in order to demand that all forest producers deliver the harvesting manifest. This means that right now there is a	

	<p>low percentage of forest producers that are delivering the harvesting manifest specially the small forest owners, leading to a failure in the application of this legal requirement. That situation has particular importance for this indicator since it is the harvesting manifest the document that has the geographic information about the harvested area.</p> <p>In order to prevent the lack of delivery of the harvesting manifest by forest producers, the biomass producer shall ensure that every load of wood must have (up to 30 days after the end of the harvesting) a harvesting manifest associated. The risk for this indicator should be classified has Specified Risk.</p> <p>Answer from the Working Body:</p> <p>The risk evaluation for this indicator was considered to be low by the stakeholders approached in the final revision process. It is considered that there are systems in place to trace the feedstock primary origin back to the forest stand, namely through the manifests, invoices and transport documents. The harvesting manifest is just one of the means of verification.</p> <p>Portugal presents a low Corruption Perception Index (63). There is a high level of law enforcement and surveillance for manifests, invoices and transport documents which are considered reliable sources of information.</p>
1.2.1	<p>Comment from Stakholder:</p> <p>Portugal has a problem related with the geometric cadastre of the rural real estate that only covers 53% of the country, which is already identified in the RRA. The Portuguese government is trying to fix this problem and is working on new specific legislation to address this issue. RRA has addressed this problem correctly but in fact there is a risk related with this indicator for the areas where there is no official information about the legal ownership, so additional measures should be taken by the biomass producer for those cases by using the legal instruments described in the RRA.</p> <p>The risk for this indicator should be classified has Specified Risk.</p> <p>Answer from the Working Body</p> <p>The IRN -Instituto de Registos e Notariado [Institute of Registries and Notaries] proves land rights, with the legal supporting document being the cadernetapredial (description in the land registry), while the financial authorities (tax and customs authority) prove ownership, the supporting document in this case being the cadastral certificate. The DGT -Direcção-Geral do Território [Directorate General for Territory] is the national public body with responsibility for public land use and urbanization policies. In addition, the cadastre is the multifunctional and definitive registration of the limits of real estate, linked to which are elements referring to the respective deeds and other complementary information such as easement and restrictions, use and occupation, encumbrances or charges, urban parameter value, licenses, etc. Ownership documents may or may not be supported in the geometric records of rural property. Over 50 per cent of the country is registered in the rural property geometric records. In areas where this does not exist, there is another register –the land cadastre, which links land registry and financial authority information. This process can be done individually or by region, with aboundaries survey (in accordance with DGT rules, by certified teams) and identification of ownership being obligatory.</p> <p>Legislation also covers other land rights in Portugal, such as renting, lending, transfer, etc. Assessment of law enforcement. Over 50 per cent of</p>

	<p>the country is registered in the rural property geometric records. In areas where this does not exist, there is another register. Legislation has been revised in order to match legal requirements to the need for information. At present, any change of ownership must be updated in accordance with the requirements of conformance, configuration and ownership, a process that involves, in a joined up and integrated way, the three bodies: the DGT, the IRN and the AT (Autoridade Tributária e Aduaneira [Tax and Customs Authority]), by means of a unique numerical code –the número de identificação predial [land registration number] (NIP). It is obligatory to update registers for land rights, forestry projects and legal regime for afforestation and reforestation (for example the regime jurídico de autorização de arborização e rearborização [legal regime for afforestation and reforestation], or RJAAR). The institutions related to both forestry and agriculture have encouraged owners to update them.</p> <p>The current legal framework have led us to conclude that this can be designated as low-risk. In Portugal, forestry activity is not considered as a fraudulent activity, and there are no violations known.</p>
1.4.1	<p>Comment from Stakeholder</p> <p>The Portuguese forest sector is characterized by a chain mostly composed of three stakeholders, the forest producer that sells the wood to a logger who in turn sells the wood to the industry. The business between the industry and the logger is well defined and there is no risk in this part of the chain, but the business between the forest producer and the logger has some risk related to tax evasion. The truth is that some of that business is made without an invoice or with only an invoice for part of the wood, meaning that less taxes will be paid and with that it will be possible to have a better price for the wood, both for loggers and for the forest producer. Portugal has some mechanisms in order to prevent this situation from happening, like the obligation of issuing an AT code (code from finances) for the transportation of each load, but most of the times the wood transportation is made by the logger meaning that that mechanism is not effective for these situations. In order to prevent that from happening, the biomass producer should ensure that an invoice has been issued between the forest producer and the logger for each load.</p> <p>The risk for this indicator should be classified as Specified Risk.</p> <p>Answer from the Working Body</p> <p>It was considered that the legal mechanisms in place are suitable for preventing tax evasion. Similarly, surveillance actions over transported wood products are constant. Data requested to SEPNA (Department of the National Republican Guard responsible for nature related activities) showed, for 2016, 26 registered violations related to wood circulating without a purchase invoice or delivery documents, which was considered residual. The final decision was to keep low risk for this indicator.</p>
2.1.1	<p>Comment from Stakeholder</p> <p>It is important to highlight that a demand by the biomass producer for an environmental impact assessment before each harvesting should be taken into account as a mitigation measure for this indicator, as well as controlling if the forest producer submitted an RJAAR after a final harvesting.</p> <p>Answer from the Working Body</p> <p>Considering the applicable legislation, the communitarian, public and private initiatives for the identification and mapping of HCV attributes, as well as tools that enable the aggregation of this relevant information (ex.: HABEaS, Geocatalogo) the risk for this indicator is considered low.</p>
	<p>Comment from Stakeholder</p>

2.1.2	<p>No mitigation measures for this indicator were defined. As possible mitigation measures, as highlighted for indicator 2.1.1, the biomass producer should demand an environmental impact assessment before each harvesting, as well as controlling if the forest producer submitted an RJAAR after a final harvesting.</p> <p>Answer from the Working Body</p> <p>The mitigation measures shall be defined by each stakeholder. Cases where a EIA is necessary are clearly laid out on the legislation and described in this document.</p>
2.1.3	<p>Comment from Stakeholder</p> <p>Portuguese legislation defines that every reforestation must be previously authorized by ICNF, as explained in RRA, meaning that all Portuguese natural or semi natural forest is “protected” from conversions. This legislation was made in 2013 and it was called RJAAR, before 2013 almost all natural and semi natural forest in Portugal was included in protected areas which means that those forests were protected by law. There is also a legislation demanding that if there is a big area that will be planted, an environmental impact assessment must be done, and only after the result of that assessment is the planting authorized, and if necessary mitigation measures are defined. There will also be a change in legislation regarding the plantation of Eucalyptus since the Portuguese government does not want the Eucalyptus area to grow in Portugal. Despite all the legislation that covers this issue, there is a problem related with new plantations in Portugal, since there are still a lot of illegal forest plantations in Portugal, specially related with small forest owners where there are cases in which forest plantations are made without an RJAAR authorization. With the probable future change to the legislation regarding the limitations on doing new Eucalyptus plantations, the percentage of illegal plantations may grow and many times those plantations are made in rural and isolated places where it is hard for Portuguese authorities to control.</p> <p>In order to prevent this from happening in the future, after a final harvesting is done, the biomass producer should control if there is an RJAAR for the harvested area in order to prevent illegal plantations from happening. Due to the silvicultural model applied for Eucalyptus this will be applied only where a final harvesting is made, so the biomass producer should also control if the load that enters the factory is coming from a final harvesting or not.</p> <p>The risk for this indicator should be classified has Specified Risk.</p> <p>Answer from the Working Body</p> <p>Please check the interpretation guide for Portugal and the detailed findings for the indication 2.1.3.</p>
2.2.1	<p>No mitigation measures for this indicator were defined. As possible mitigation measures, as highlighted for indicator 2.1.1, the biomass producer should demand an environmental impact assessment before each harvesting, as well as controlling if the forest producer submitted an RJAAR after a final harvesting, where planning is defined.</p>
2.2.2	<p>In the Portuguese forest sector one commonly sees bad practices regarding soil preparation usually before plantations, leading to a higher risk of erosion and also to a lower soil productivity. Despite that, there is an improvement regarding this issue, including a better control by ICNF in order to prevent these practices from happening, by not approving any RJAAR when a bad soil preparation is described when a forest owner submits an RJAAR for approval. The problem in these situations is where illegal plantations are made, as it was addressed in the comments to indicator 2.1.3, in which authorities do not have any control in the practices used by forest producers. There is also another situation regarding soil protection that is not accounted for in Portuguese legislation, since it is not mandatory to do environmental impact assessments before each operation, especially for small forest owners, so many times mitigation measures are not defined resulting in soil impacts.</p>

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

	<p>prevent those situations from happening, biomass producers should ensure that forest producers follow the appropriate silvicultural models for Eucalyptus stands. This is a situation that affects only a small part of the wood used to make pellets, since most of the raw material used is coming from Pine wood.</p> <p>The risk for this indicator should not be raised to Specified Risk, but a remark should be made about this issue.</p>
2.3.2	<p>It is also important to highlight that Portugal has a bad record regarding agricultural/forestry working related accidents. Most of them are related to lack of training by workers. Despite all the options described in the indicator regarding technical training for workers, one commonly verifies that most of the workers do not have the minimum training hours laid out in the Portuguese working code (35 hours).</p>
2.4.2	<p>The risk assessment for this indicator was correctly done by the WB, but there is important information missing from the indicator, related with forest fires and also pests and diseases. Regarding forest fires, Portugal has a big problem with forest fires where the worst of them happened in the current year, one of the causes of this problem is the lack of implementation of fire management tracks during forest plantation, this is an issue resulting from illegal plantations specially with small forest owners, in which an RJAAR is not submitted to ICNF and ICNF cannot control if the forest management tracks are being respected in new plantations. In order to address this issue, the biomass producer should control if after a final harvesting an RJAAR is submitted to ICNF by the forest producer.</p> <p>Regarding pests and diseases, Portugal currently has a problem with a pine nematode disease which has substantially reduced the Pine area in Portugal, as was described in the comments to indicator 2.2.5.</p> <p>In order to address this issue, the biomass producer should control if there is the need to apply mitigation measures for the Pine loads and control if those mitigation measures are being applied.</p>
2.5.1	<p>It is important to include in the indicator that there are some traditional rights that should be safeguarded including for beekeepers, hunters and shepherds.</p> <p>The risk for this indicator should remain as low risk.</p>
2.7.2	<p>It is important to highlight that Portugal has some problem related with illegal working in the agricultural sector, but those problems were not detected in the forest sector, the main problems related with conditions at work in forest operations are highlighted in comments for indicator 2.8.1.</p>
2.7.5	<p>It is important to highlight that Portugal has some problem related with illegal working in the agricultural sector, but those problems were not detected in the forest sector, the main problems related with conditions at work in forest operations are highlighted in comments for indicator 2.8.1.</p>
2.8.1	<p>The risk assessment for this indicator was correctly done by the WB, but as it was commented in indicator 2.3.2, Portugal has a bad record regarding agricultural/forestry working related accidents. There are several causes for those accidents, usually they are related with the lack of training that leads to a lack of use of proper PPEs, a lack of respect for safety distances and also lack of training in H&S.</p> <p>Despite the WB defining this indicator as Specified Risk, no mitigation measures were defined. In order to mitigate the risk in this indicator, the biomass producer should have the proper means to control if workers have the proper training and if all safety measures are being respected during forest operations, including the use of PPEs, safety distances, work insurance and aptitude forms.</p>
2.9.1	<p>It is important to highlight for this indicator that the planning instrument that stipulates changes in the land use is the Municipal Land-use planning (PDM), which limits and defines the changes that can be made to the land use.</p>
Comment from stakeholder	
Indicator 1.2.1	

The current shift to low risk appears to be motivated by practical interests and is poorly backed up by arguments. The process of stakeholder consultation on this point is insufficiently described. Considering the fact now all legality indicators and social aspects are low risk, including 2.6.1, the actual problems at areas without cadastral data are not taken sufficiently into account.

Referring to the complaint procedure of SBP itself makes a very poor impression. Most local residents, who are unhappy about the forest operations will not find the complaint procedure and will not be able to express clearly their complaint in English. SBP itself is not the right organisation to give the responsibility of solving the disputes either.

Answer from the working group (WG)

The IRN -Instituto de Registos e Notariado [Institute of Registries and Notaries] proves land rights, with the legal supporting document being the caderneta predial (description in the land registry), while the financial authorities (tax and customs authority) prove ownership, the supporting document in this case being the cadastral certificate. The DGT -Direcção-Geral do Território [Directorate General for Territory] is the national public body with responsibility for public land use and urbanization policies. In addition, the cadastre is the multifunctional and definitive registration of the limits of real estate, linked to which are elements referring to the respective deeds and other complementary information such as easement and restrictions, use and occupation, encumbrances or charges, urban parameter value, licenses, etc. Ownership documents may or may not be supported in the geometric records of rural property. Over 50 per cent of the country is registered in the rural property geometric records. In areas where this does not exist, there is another register –the land cadastre, which links land registry and financial authority information. This process can be done individually or by region, with boundaries survey (in accordance with DGT rules, by certified teams) and identification of ownership being obligatory.

Legislation also covers other land rights in Portugal, such as renting, lending, transfer, etc. Assessment of law enforcement. Over 50 per cent of the country is registered in the rural property geometric records. In areas where this does not exist, there is another register. Legislation has been revised in order to match legal requirements to the need for information. At present, any change of ownership must be updated in accordance with the requirements of conformance, configuration and ownership, a process that involves, in a joined up and integrated way, the three bodies: the DGT, the IRN and the AT (Autoridade Tributária e Aduaneira [Tax and Customs Authority]), by means of a unique numerical code –the número de identificação predial [land registration number] (NIP). It is obligatory to update registers for land rights, forestry projects and legal regime for afforestation and reforestation (for example the regime jurídico de autorização de arborização e rearborização [legal regime for afforestation and reforestation], or RJAAR). The institutions related to both forestry and agriculture have encouraged owners to update them.

The current legal framework have led us to conclude that this can be designated as low-risk. In Portugal, forestry activity is not considered as a fraudulent activity, and there are no violations known.

Comment from stakeholder

Indicator 2.1.3

Here the definition of FORESTS is given, but we cannot agree with it.

“For the purpose of this document and specifically for this indicator, the concept of “forest” will be described by the definition of “natural forest” from the FSC forest management standard for Portugal.”

Do you consider 99% of the Portuguese forested lands plantations?

By considering only natural forests – forests, nearly no forests are considered forests in Portugal at all. What happened to the “managed forests” category, and “semi-natural forests” categories?

As you mentioned yourself, many pine forests were planted more than 100 years ago and have been managed since. Some of these forests have regenerated naturally, this are forests with specific ecosystems and services and cannot simply all be called plantations. It looks like a convenient way to avoid a specification risk has been searched.

Answer from the working group (WG)

Maritime Pine (Pinus Pinaster) as the common name implies, occurs naturally on seashores. These particular landscapes and ecosystems are identified within Natura2000 framework and the harvest of trees is well regulated. Water lines and rivers also have a very comprehensive law. Pine was planted in the interior at the end of 19th century due to the need of wood that was scarce due to the extensive use for nautic and building construction. After that, of course, the settlements regenerated naturally to what can be described as semi-natural forests. As you surely remember, from the SBP workshop in Lisbon, SBP CEO and ASI considered that the Working Group should establish a threshold from what is considered as forest within the scope of the 2.1.3 indicator, which is not as clear as the indicator 4.1 of FSC CW (Conversion of natural forests to plantations or non-forest use in the area under assessment is less than 0.02 per cent or 5.000 hectares average net annual loss for the past five years (whichever is less)). The working group used the same thresholds.

Beside that, the forestry procedures applied to pine rarely comprise continuous clear cuts, due to the multipurpose use of the pinewood in Portugal.

Comment from stakeholder:

Indicator 2.9.1

Indicator 2.9.1 clearly indicates that we need to study the timeframe after January 2008. But the draft RRA looks at the period before. As can be seen from your table in 2.1.3 and also the FAO statistical data, forest area and thus carbon stock has been declining very stably for over 20 years now (7% in total). The draft RRA does not mention this (at least not in 2.9.1 and 2.9.2).

Answer from the Working Body (WB)

[The National Forest Inventory 6 Final Report](#), comprising the period from 2005 to 2015 shows an increase in forested area of 1.9%, reversing the trend of decrease of the previous inventories.

Moreover, the inventory also shows an increase on the stored carbon in forests.

Comment from Stakeholder

While I drove through Portugal last month, I saw many old (beautiful) pine forests along rivers, coastlines, objects of cultural importance, etc. These forests are not plantations (as the RRA implies). The main function of these forests isn't wood production. Their main function are the services they deliver to the environment and the people. After more than 200 years of presence in Portugal and regarding the present climate change, the pine forests have become an integral and vital part of the environment in Portugal to which flora and fauna have adapted. These forests can regenerate naturally, harbor key-ecosystems and important habitats. The guidance in SBP Standard 1 on indicator 2.1.3 is clear and well put, it states:

Production plantation forests are forests of exotic species that have been planted or seeded by human intervention and that are under intensive stand management, are fast growing, and subject to short rotations. Example: Poplar, Acacia or Eucalyptus Plantations.

Most pine forests do not match with this common and accepted definition of plantations in several ways.

Many pine stands are multifunctional managed forests (not plantations). Moreover, regardless of the conversion from forests to plantations, the FAO statistics show a clear trend of conversion of forests and plantations to other kinds of land-use, triggering the specified risk determination for both 2.1.3 and 2.9.1.

Answer from the working group (WG)

Maritime Pine (Pinus Pinaster) as the common name implies, occurs naturally on seashores. These particular landscapes and ecosystems are identified within Natura2000 framework and the harvest of trees is well regulated. Water lines and rivers also have a very comprehensive law. Pine was planted in the interior at the end of 19th century due to the need of wood that was scarce due to the extensive use for nautic and building construction. After that, of course, the settlements regenerated naturally to what can be described as semi-natural forests. As you surely remember, from the SBP workshop in Lisbon, SBP CEO and ASI considered that the Working Group should

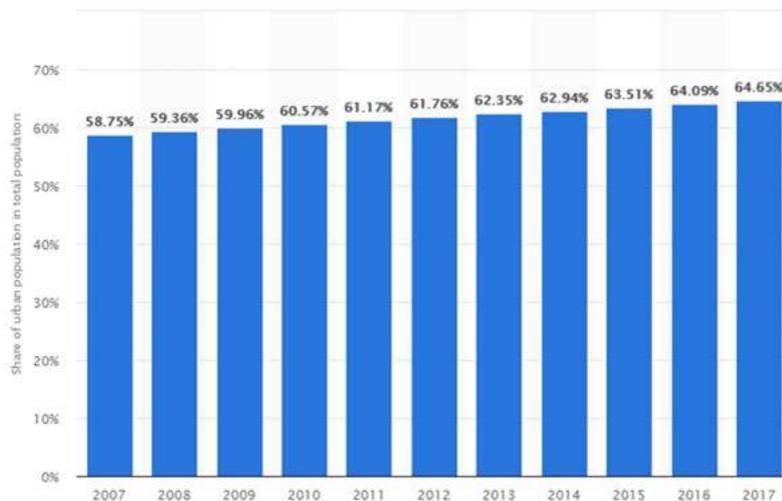
establish a threshold from what is considered as forest within the scope of the 2.1.3 indicator, which is not as clear as the indicator 4.1 of FSC CW (Conversion of natural forests to plantations or non-forest use in the area under assessment is less than 0.02 per cent or 5.000 hectares' average net annual loss for the past five years (whichever is less)). The working group used the same thresholds.

Besides that, the forestry procedures applied to pine rarely comprise continuous clear cuts, due to the multipurpose use of the pinewood in Portugal.

Comment from Stakeholder

Below a table on urbanization in Portugal. From 2007 to 2017, 10% more people now live in cities (the 58,75% in 2007 increased by 5,90%), the trend is linear. To my opinion we should investigate the decrease of areas covered by forests and plantations in the Porto and Lisbon areas (with regard to indicators 2.1.3 and 2.9.1). This topic of urbanization (and the risks related to it) deserves attention within the RRA. The 7th National Forest Inventory of ICNF (2010 – 2015) would probably give us a much better understanding of the actual issues.

Portugal: Urbanization from 2007 to 2017



Answer from the working group (WG)

[The National Forest Inventory 6 Final Report](#), comprising the period from 2005 to 2015 shows an increase in forested area of 1.9%, reversing the trend of decrease of the previous inventories. Furthermore, please consider consulting the HABEaS Portugal tool and check the Carbon stored in Oporto and Lisbon Metropolitan Area. It is quite clear, and usual, that urban areas don't have a significant carbon stock. Moreover, the inventory also shows an increase on the stored carbon in forests.

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

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

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

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

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

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

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

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

Serras do Barlavento Algarvio				
Woodser, Lda.	Wood Supplier			
WWF - European Policy Office Branch Office	Environmental NGO			