Supply Base Report: Pellets Power Lda

Re-assessment

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Completed in accordance with the Supply Base Report Template Version 1.4

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

Document history

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1 Overview

Producer name: Pellets Power Lda

Producer address: Lugar do Freixo, 3450-116 Mortágua, Portugal

SBP Certificate Code: SBP-01-12

Geographic position: 40.419500, -8.253200

Primary contact: Filipa Rebelo, +351969647006,f.rebelo@gesfinu.com

Company website: www.gesfinu.com

Date report finalised: 11 Nov 2020

Close of last CB audit: 17 Nov 2020

Name of CB: NEPCon OÜ

SBP Standard(s) used: SBP Standard 1: Feedstock Compliance Standard, SBP Standard 2: Verification of SBP-compliant Feedstock, SBP Standard 4: Chain of Custody, SBP Standard 5: Collection and Communication of Data Instruction

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

SBP Endorsed Regional Risk Assessment: Not applicable

Weblink to SBR on Company website: N/A

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

2 Description of the Supply Base

2.1 General description

Feedstock types: Primary, Secondary

Includes Supply Base evaluation (SBE): Yes

Feedstock origin (countries): Portugal

2.2 Description of countries included in the Supply Base

Country: Portugal

Area/Region: mainland

Exclusions: No

Portugal forest area covers 3 154 800 hectares (Forest Profile, Nov. 2018). According with ICNF (Instituto da Conservação da Natureza e Florestas), forest land use is the dominant use of the mainland (36% according to National Forest Inventory 6). About 70% of the territory of continental Portugal consists of forest areas, where 92% of the forests are located on private land, 6% in community land and only about 3% in public areas (Forest Profile, Nov. 2018, based on NFI6).

All types of forest areas presented in Portugal mainland are plantations, semi-natural and natural forests.

Distribution of soils areas in Portugal (Forest Profile, Nov. 2018, based on NFI6) is the following:

- Forests - 35%,
- Shrublands & rangelands - 31%,
- Agricultural areas – 25%,
- Urban areas – 5%,
- Inland waters – 2%,
- Barren land - 2%;

In 2015 the forest land use was the dominant use of the mainland Portugal, occupying 35%. The woods and pastures are the following class of land use with larger area, the bushes corresponding to 31% of this class. Agricultural areas account for 25% of the mainland.

The distribution of total areas for species/species group Portuguese forest is the following:

- *Eucalyptus* - 26%,

- *Pinus Pinaster* - 23%,
- *Cork oak* - 23%,
- *Holm oak* – 11%
- *Pinus Pinea* – 6%,
- Other broadleaves - 6%,
- Other conifers – 2%
- Other oaks- 2%
- *Sweet chestnut* – 1%.

Mainland forests are dominated by indigenous species, namely several oaks (including cork oak and holm oak “montados”, about 36% of the total) and pine trees (about 30%). Eucalyptus (mainly Tasmanian blue gum and shinning gum) represent 26% of the forest area and the remaining area is occupied by less common species (including sweet chestnut, carob tree, acacia, poplar, riparian and other species)

The Portuguese forest management areas are protected from illegal harvesting, settlement and other unauthorized activities.

Natural forests are classified as habitats, and are thus safeguarded by another legal framework which is even more limiting. The results of the last National Forest Inventory show an increase of forest area.

As mentioned before, Portuguese legislation prohibits conversion of natural forest to plantations (1901 and 1903 “regime florestal” decrees, decree-laws n.º 166/2008, of 22-08 on the National Ecological Reserve, decree-laws n.º 254/2009, of 24-09, revoke by Decree-Laws n.º 12/2012, of 24-09 on the Forest code and 169/2001, of 25-05 on cork and holm oak).

Furthermore, land use changes after forest fires are conditioned by law (decree-laws n.º 254/2009, of 24-09, revoke by Decree-Laws n.º 12/2012, on the Forest code and 169/2001, of 25-05); changes must be submitted to the National Forest Authority (AFN).

The wood growth volume (live trees) of Pinus Pinaster decreased 15 Mm^3 since last NFI, and is 67 Mm^3 in 2015. The wood growth volume of eucalyptus is kept constant since NFI5 (43 Mm^3).

In 2015, Portugal have 172 million of cubic meters (Mm^3) of growth wood, an identical value comparing to NFI5 (2005).

No difference between the wood volumes in the 2 last inventories (NIF5 and 6) show us that in this period, the florestal production, can be, in global terms, be considered as sustainable. Wood cuts and the loses for florestal fires and diseases are in equilibrium with forest growth. However, this analysis made for the main species with Woody use reveals a different situation.

NFI6 characterizes the state of the forest in 2015 which is necessarily different from its current situation, as a result of the dynamics of forest ecosystems and, in particular, severe rural fires of 2017 and 2018 (Monchique).The impact of these disturbances and the dynamics of deforestation/reforestation and exploitation of resources will be properly assessed in the next NFI, which is scheduled for the start of next year.

We keep Pinus pinaster wood available / average annual growth as a low risk indicator.

The raw material received is from private land suppliers or national authority forests, and we can be found the following situations:

§ National Authority forests – Cleanings forest /lands (to avoid fires, diseases wood etc...);

§ Private small land suppliers (to avoid fires, and valorize economical quantities of their raw material etc.…) (local suppliers);

§ Land suppliers use the land for production of pine nuts (local suppliers);

§ 100% certified material is very residual because raw material price from certified areas is very high. The option is to guarantee FSC® controlled wood in the case of small land suppliers (that is the majority of Pellets Power, Lda. suppliers);

§ Certificate areas of eucalyptus are mainly intended for other industries that can accommodate higher raw material prices, as papermills.

§ In Portugal, 295.513 ha of forest area were certified under PEFC scheme and 490.212 ha under FSC® scheme (08/09/2020 https://pt.fsc.org/pt-pt; consulted 10/11/2020 https://www.pefc.pt/)

Law No. 33/96 of 17 August defines the bases of the national Forest Policy and the foundations of national Forest Policy, including the fundamentals to the development and strengthening of institutions and programs for the management, conservation and sustainable development of forests and associated natural systems, aimed at meeting the needs of the community, a framework of spatial planning. (decree-laws n.º 254/2009, of 24-09, - Forest National Code, revoke by Decree-Laws n.º 12/2012).

Public forests are managed by the Institute for Nature and Forests Conservation (ICNF).

The declaration of felling, pruning, and circulation of conifer wood, set out in article 6 of Decree-Law no. 123/2015, dated 3 July, must be obligatorily provided in advance whenever; a) it concerns the felling, and transport, or transport of wood from the felling of conifers that are hosts of the pine wood nematode in continental territory, b) it concerns the pruning of host conifers in continental territory.

The new legal framework applying to the harvesting, transportation, storing, transformation, import, and export of Pinus pinea L. in continental territory, which was approved by Decree-Law no. 77/2015, dated 12 May, is effective as of 10 August 2015.

The regulations require that the ICNF is given advance notice of any economic activity or operation involving the harvesting, transportation, storing, transformation, import, and export of Pinus pinea L. and that those carrying out such activities are registered.

The legal framework applicable to the application of resin and the circulation of pine resin in continental territory was approved by Decree-Law no. 181/2015, dated 28 August. This law is effective as of 28 September 2015, with the exception of articles 6 to 9, ‘prior notification’ and ‘registration of a resin operator’, which are effective as of 1 January 2016.

The regulations require that the ICNF is provided with advance notice of the extraction of pine resin, its import and export, as well as transportation, storing, and entry to an establishment for the first industrial transformation, and that resin operators are subject to registration.

Portuguese forests are influenced by the climate and geography, among other factors, being significantly different in the North and in the South. The North is mostly mountainous and influenced by the Atlantic climate. Here there are oak forests of Quercus pyrenaica, with settlements of Cytisus sp. and several pockets of invasive species, such as Acacia sp.. The South is characterized for plains and less relief. Portugal's endemic Mediterranean forests are characterized by oak forests (Quercus robur and Quercus rotundifolia) with several types of vegetation. Pine trees (Pinus pinaster and Pinus pinea) and Eucalyptus (Eucalyptus globulus) exists in all territory, as well as abundant bushes of rockrose orlabdanum (Cystus ladanifer) and strawberry tree (Arbutus unedo) (source: Godinho-Ferreira et al., 2005).

The first goal of forest management is to improve the production (timber and cones/pine nuts). This strategic forest planning methodology allows the integration of two different silviculture's (timber production or forest products) and the choice of the best in each stand.

The timber and the resin constitute the most financially profitable forest products, that target the various activities such as sawmills, production of paper pulp, cellulose or energy, among many others. (source – Plano Director Municipal de Penacova*, Caracterização Florestal, Abril 2015*).

Pellets Power, Lda. valorize all silvicultural residues (low quality round wood, leaves, branches etc..), which final destination would be burning or incorporation in the soil. The raw material coming from forest clean operations and pine plantation maintenance and the main goal is to give an economic value of the cleaning wood residues forest.

The raw material origin is all from Portugal. Pellets Power, Lda., receives the majority of fiber from *Pinus pinaster* forest. The forest management practices consist in cleaning the trees and soil and promoting the wood pine growing. Pellets Power, Lda. use waste forest like wood resulting from logging, waste from burned areas, waste from the cleaning of forests and woods, among others.

The *Pinus pinaster* is a fast-growing specie, intolerant to shade. Pinus pinaster has higher hardiness and has been used in Portugal, in afforest very small fertile land (as in the case of some dunes) in the northern and center mountains.

In the maritime pine pruning the goal is to obtain the best quality timber production (sawmill, papermill, etc).

Pine forests are the second forest formation, with an area close to 1 million hectares, being the forest ecosystems having the greatest reduction in the occupied area. The decrease in area is due to maritime pine forests, which are very affected by fires and pests (the nematode being the most significant), which exceeds the significant increase in the pine tree pine area (20.7 thousand ha; 12% between NFI5 and NFI6). However, in the period between 2010 and 2015, the area of Pinus pinaster, registered a very significant deceleration in face of the sharp downward trend that was observed since 1995 (NFI4), which reveals the extraordinary resilience of these pine forests to disturbances.

In the maritime pine pruning the goal is to obtain the best quality timber production (sawmill, papermill, etc).

All raw material received by Pellets Power, Lda. is evaluated as FSC®-Controlled Wood (included in our internal suppliers' audits), and some percentage as FSC® 100%.

The majority of Pellets Power, Lda. wood suppliers, work with the Organizations of Forest Producers (OF). Organizations of Forest Producers are a central element in the representation of interests of forest owners and managers, playing an important role in supporting forest owners and producers to achieve the good practices of forest management.

Pellets Power, Lda. raw material is characterized as:

§ None of the species received is CITES-listed (*Pinus Pinaster, Alnus glutinosa,Acacia dealbata, Acacia melanoxylon, Cupressus lusitanica, Populus, Salix alba, Quercus, Platanus, Eucalyptus globulus, Pinus Radiata, Pinus Pinea, Castanea Sativa, Prunus Serotina, Quercus Faginea, Quercus Suber, Pinus Nigra, Pinus Sylvestris*). CITES does list a considerable number of protected plant species for Portugal, however, the list does not include any tree species. It also was not found any direct effect of harvesting or forest management over CITES listed species. https://cites.org/eng/cms/index.php/component/cp/country/PT

§ The "Red List" of the IUCN (International Union for Conservation of Nature and Natural Resources) indicates hundreds of species for the continental territory of Portugal, but also does not include any tree species.

§ Raw material close to Pellets Power, Lda is mainly *Pinus pinaster.* Pellets Power, Lda works with many suppliers which have their own forest, so they have to make sure it is clean (legal obligation).

Natural forests are classified as habitats, and are safeguarded by another legal framework, which is even more limiting. The results of the last National Forest Inventory (NFI6) show an increase of forest area.

As mentioned before, legislation does not allow conversion of natural forest. After forest fires, any changes have to be submitted to the national forestry authority. There is also legislation to protect wetlands, peat land, protected areas and highly biodiverse grasslands.

In the reported period 72,70% of the raw material received was Controlled feedstock and 27,30% Compliant feedstock. Pellets Power, Lda. received material from secondary feedstock category around 1,33%.

Primary feedstock is sourced directly from the forest in the form of round wood /branch with low grade round wood from around of 52 suppliers (reported period).

Protected Portuguese National areas (http://www.icnf.pt/portal/ap, consulted 11/11/2020)

Portuguese wood production is only sufficient to supply 80% of the industry needs.

Main wood industries in Portugal are pulp and paper, MDF, pellets, and furniture industry.

Every year companies that transform Pinus or produce pulp and paper have to import 20% of the wood needs of eucalyptus or Pinus pinaster.

2.3 Actions taken to promote certification amongst feedstock supplier

Pellets Power, Lda is promoting sustainable forest management (FSC® CW/ FSC® 100%). Pellets Power, Lda (inside of multisite certification Gesfinu SGPS, S.A. Group) has the FSC® Chain of Custody and FSC® Controlled Wood certification since 2012 and annually performs an audit suppliers' program (Audit verification of timber supply) that checks and reviews evidences of raw material origin documentation delivery to plant. Audit processes include field visits (inspections) in which a selection of suppliers is annually audited. Main goal is to verify the origin of the material supplied, evidences related to the quantity, quality, veracity of transport documents, among other items, in order to meet the requirements of FSC® Controlled Wood.

In case of Pellets Power, Lda., there is a direct contact between the plant responsible for raw material purchase and suppliers, which permits to alert suppliers for the advantages of good forestry practices, as

well as the certification of own forest area. Furthermore, it has been transmitted to suppliers' customers' requirements regarding the traceability of the origin of raw material, its sustainability and the advantage and recognition of certified forest areas. At the same time, the COC responsible and as well as raw material purchase responsible have participated in management and forest certification trainings / workshops to improve their knowledge in this area.

2.4 Quantification of the Supply Base

Supply Base

a. **Total Supply Base area (million ha)**: 3,20
b. **Tenure by type (million ha):**3.10 (Privately owned), 0.10 (Public)
c. **Forest by type (million ha):**3.10 (Temperate)
d. **Forest by management type (million ha):**2.30 (Managed natural), 0.90 (Plantation)
e. **Certified forest by scheme (million ha):**0.49 (FSC), 0.30 (PEFC)

Describe the harvesting type which best describes how your material is sourced: Thinning
Explanation: The forest management practices consist in cleaning the trees and soil and promoting the wood pine growing. Pellets Power, Lda. use waste forest like wood resulting from logging, waste from burned areas, waste from the cleaning of forests and woods, among others.
Was the forest in the Supply Base managed for a purpose other than for energy markets? Yes - Majority
Explanation: Main wood industries in Portugal are pulp and paper, MDF, and furniture industry.

For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling? Yes - Majority
Explanation: The forest supply area is mainly composed by natural regeneration areas of Pinus Pinaster (≈80%), and the remaining species from road, forest fires, forest diseases, storms, arboricultural arising and water lines cleanings management, wood residues from others forests cleanings (for example: low grade round from wood energy crops) and areas whose the aim is remove invasive species (e.g. Acacia).

Was the feedstock used in the biomass removed from a forest as part of a pest/disease control measure or a salvage operation? Yes - Majority
Explanation: The forest supply area is mainly composed by natural regeneration areas of Pinus Pinaster (≈80%), and the remaining species from road, forest fires, forest diseases, storms, arboricultural arising and water lines cleanings management, wood residues from others forests cleanings (for example: low grade round from wood energy crops) and areas whose the aim is remove invasive species (e.g. Acacia).

Feedstock

Reporting period from: 01 Sep 2019

Reporting period to: 31 Aug 2020

a. **Total volume of Feedstock**: 1-200,000 tonnes
b. **Volume of primary feedstoc**k: 1-200,000 tonnes
c. **List percentage of primary feedstock, by the following categories.**
    - Certified to an SBP-approved Forest Management Scheme: 1% - 19%

- Not certified to an SBP-approved Forest Management Scheme: 80% - 100%

d. List of all the species in primary feedstock, including scientific name: Pinus pinaster (Pinus pinaster); Alnus glutinosa (Alnus glutinosa); Acacia dealbata (Acacia dealbata); Acacia melanoxylon (Acacia melanoxylon); Cupressus lusitanica (Cupressus lusitanica); Populus spp (Populus); Salix alba (Salix alba); Quercus spp (Quercus); Platanus spp (Platanus); Eucalyptus globulus (Eucalyptus globulus); Pinus radiata (Pinus radiata); Pinus pinea (Pinus pinea); Castanea sativa (Castanea sativa); Prunus serotina (Prunus serotina); Quercus faginea (Quercus faginea); Quercus suber (Quercus suber); Pinus nigra (Pinus nigra); Pinus sylvestris (Pinus sylvestris);

e. Is any of the feedstock used likely to have come from protected or threatened species? No

- Name of species: N/A
- Biomass proportion, by weight, that is likely to be composed of that species (%): N/A

f. Hardwood (i.e. broadleaf trees): specify proportion of biomass from (%): 18,00

g. Softwood (i.e. coniferous trees): specify proportion of biomass from (%): 82,00

h. Proportion of biomass composed of or derived from saw logs (%): 0,00

i. Specify the local regulations or industry standards that define saw logs: N/A

j. Roundwood from final fellings from forests with > 40 yr rotation times - Average % volume of fellings delivered to BP (%): 0,00

k. Volume of primary feedstock from primary forest: 200000 tonnes

l. List percentage of primary feedstock from primary forest, by the following categories. Subdivide by SBP-approved Forest Management Schemes:

- Primary feedstock from primary forest certified to an SBP-approved Forest Management Scheme: 20% - 39%
- Primary feedstock from primary forest not certified to an SBP-approved Forest Management Scheme: 60% - 79%

m. Volume of secondary feedstock: 1-200,000 tonnes

- Physical form of the feedstock: Chips, Sawdust

n. Volume of tertiary feedstock: 0 N/A

- Physical form of the feedstock: N/A

Proportion of feedstock sourced per type of claim during the reporting period				
Feedstock type	**Sourced by using Supply Base Evaluation (SBE) %**	**FSC %**	**PEFC %**	**SFI %**
Secondary	1,33	0,00	0,00	0,00
Tertiary	0,00	0,00	0,00	0,00
Primary	25,14	2,18	0,00	0,00
Other	0,00	0,00	0,00	0,00

3 Requirement for a Supply Base Evaluation

Is Supply Base Evaluation (SBE) is completed? Yes

A Supply Base Evaluation is required because a significant proportion of the forest surrounding the pellet mill is not certified.

This evaluation will determine the legality and sustainability of fibre (primary feedstock) delivered to Pellets Power, Lda..

4 Supply Base Evaluation

4.1 Scope

Feedstock types included in SBE: Primary

SBP-endorsed Regional Risk Assessments used: Not applicable

List of countries and regions included in the SBE:

Country: Portugal

Indicator with specified risk in the risk assessment used:
2.1.2 The BP has implemented appropriate control systems and procedures to identify and address potential threats to forests and other areas with high conservation values from forest management activities.

Specific risk description:
Potential threats to forests and other areas with high conservation values from forest management are identified and addressed.

Country: Portugal

Indicator with specified risk in the risk assessment used:
2.2.1 The BP has implemented appropriate control systems and procedures to verify that feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them.

Specific risk description:
Feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them.

Country: Portugal

Indicator with specified risk in the risk assessment used:
2.2.2 The BP has implemented appropriate control systems and procedures for verifying that feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b)

Specific risk description:
Feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b).

Country: Portugal

Indicator with specified risk in the risk assessment used:
2.2.3 The BP has implemented appropriate control systems and procedures to ensure that key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).

Specific risk description:
Key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).

Country: Portugal

Indicator with specified risk in the risk assessment used:
2.2.4 The BP has implemented appropriate control systems and procedures to ensure that biodiversity is protected (CPET S5b).

Specific risk description:
Biodiversity is protected (CPET S5b).

Country: Portugal

Indicator with specified risk in the risk assessment used:
2.2.6 The BP has implemented appropriate control systems and procedures to verify that negative impacts on ground water, surface water and water downstream from forest management are minimised (CPET S5b).

Specific risk description:
Negative impacts on ground water, surface water and water downstream from forest management are minimised (CPET S5b).

Country: Portugal

Indicator with specified risk in the risk assessment used:
2.3.2 Adequate training is provided for all personnel, including employees and contractors (CPET S6d).

Specific risk description:
Adequate training is provided for all personnel, including employees and contractors (CPET S6d).

Country: Portugal

Indicator with specified risk in the risk assessment used:
2.4.2 The BP has implemented appropriate control systems and procedures for verifying that natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b).

Specific risk description:
Natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b).

Country: Portugal

Indicator with specified risk in the risk assessment used:
2.8.1 The BP has implemented appropriate control systems and procedures for verifying that appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12).

Specific risk description:

Appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12).

4.2 Justification

The incomings are from certified suppliers, certified land and not certified. In order to cover the majority of raw material supplies it was therefore deemed prudent to evaluate the entire area without exclusions. The supply area for Pellets Power, Lda is included in one assessment, as the applicable legal requirements across the supply base is sufficiently similar and the forest practices are also similar. This review and analysis were completed by comparing the existence, effectiveness and applicability of legislation/regulations, established forestry best management practices and recognized research from reputable sources in order to determine compliance and risk rating in relation to Criteria 1 & 2 of the SBP Standard 1.

4.3 Results of risk assessment and Supplier Verification Programme

Pellets Power, Lda identified the following indicators as specified: Specified risks: - 2.1.2 Potential threats to forests and other areas with high conservation values from forest management are identified and addressed. - 2.2.1 Feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimize them - 2.2.2 Feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b). - 2.2.3 Key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b). - 2.2.4 Biodiversity is protected (CPET S5b). - 2.2.6 Negative impacts on ground water, surface water and water downstream from forest management are minimized (CPET S5b). - 2.3.2 Adequate training is provided for all personnel, including employees and contractors (CPET S6d). - 2.4.2 Natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b). - 2.8.1 Appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12). All the other indicators were considered as low risk. Risk assessment results indicate the risk classified as “low or specified risk”. In spite of the specified risk identified, Pellets Power, Lda. created a SVP as mitigation measure in order to evaluated our approved suppliers’ implementation under the SR. In 2019/2020 were evaluated 8 suppliers. The results show, that the specified risks evaluated in audit forest land were considered as low risk, and the requirements were predominantly complied. Pellets Power, Lda goal is to continue to increase the field audit number to verified the risk assessment and the number of qualified suppliers. In order to evaluate the specified risks identified in the risk assessment, field assessments conducted under the SBP had as their main goal: collection of information during field verification audits of safety and health aspects, identification and protection of conservation values, biodiversity protection (interviews with workers, on-site visualization, and verbal and documentary inquiry) and identify soil impacts of forest activity. To support the forestry operators, Pellets Power, Lda. has developed a guide of good forestry and health and safety on work practices. Before each field audit, the supplier and / or owner land gives documentation of the forest/land area and Pellets Power, Lda. surveyed to identify and characterize the origin. In the field, the technical aspects of the type of operation were reviewed, followed by the checklist’s audits developed by Pellets Power, Lda. with questions, as identification and protection of high conservation values, biodiversity protection, species protection, forest management plan, forest legislation, municipal regulations or directives applicable and documentation that proves and supports verified items. The safety & health aspects were initially assessed by mandatory legal documentation, and then seen in the field. For the indicators n.º 2.3.2 and 2.8.1, it was found that in general the use / availability of equipments for individual safety by the supplier was implemented, since workers had the minimum safety equipment and were familiar with their use. All operators are registered as forest operators and under legal compliance (example: EUTR/RIO, RJJAR (D.L. n.º 96/2013), NMP etc..). - 2.3.2

Adequate training is provided for all personnel, including employees and contractors (CPET S6d). - 2.8.1 Appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12). An information document of good Forest practices and safety practices was sent to suppliers, always alerting them to the importance of the appropriate use of equipments for individual safety and their advantages. For HCVs, an internal checklist was drawn up on the identification, survey and field evaluation of HCVs in the verified sites, based on the general documentation. Prior to each visit, a survey of existing information was carried out to be verified in the field. - 2.1.2 Potential threats to forests and other areas with high conservation values from forest management are identified and addressed. - 2.2.3 Key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b). - 2.2.4 Biodiversity is protected (CPET S5b). During the evaluation it was verified that the operators/collaborators were familiar with the measures to implement in order to preserve the HCV directly related to the developed forest activity. No non-conformities were detected for HCV, and overall operators identified the most critical issues to be addressed during HCV preservation operations, with risks classified as low risk. - 2.2.1 Feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them - 2.2.2 Feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b). - 2.4.2 Natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b). - 2.2.6 Negative impacts on ground water, surface water and water downstream from forest management are minimised (CPET S5b). In environmental aspects/impacts and best forest practices, the measures adopted to avoid contamination of the soil in relation to substances of a hazardous nature (lubricants of machines, containers, etc.) were also evaluated in the field. No non-conformities were detected for 2.2.1, 2.2.2, 2.4.2 and 2.2.6, and overall operators identified the most critical issues to be addressed during best forest practices or/and forest plan preservation operations, with risks classified as low risk. In summary, a supplier qualification matrix was produced with the final result of each supplier evaluated, as well as their classification (approved / not approved). In the case of forestry activities, which are outside the scope of the risk assessment, these are excluded, and this raw material is considered only as SBP- Controlled feedstock.

4.4 Conclusion

The main raw materials cover wood pine (natural regeneration of Pinus pinaster) from thinnings. The scope of the SBE is Portugal, but in terms of economic viability of Pellets Production wood Price vs Pellets price sale, makes the demand / SBE mainly in the Center Portugal Region. Pellets Power, Lda has been done suppliers audits since 2012, suppliers were involved and they already collaborated in Controlled Wood and Due Diligence evaluations. The new specified risks were an upgrade in these systems, which have been well received by the suppliers. Due to the fact that the forestry operations considered in the SBE where is inhomogeneous, it made the evaluations more difficult and started with a small number of suppliers. The involvement of the selected suppliers allowed a consistency of the results obtained were positive, because there is a lot of practical and theoretical information about these good forest activities, the support legislation and control of the audits monitored. Many of them are COC certified, and work in 100% FSC certified forest areas. This knowledge and way of working became productive to achieve low risk for the indicators (soil quality, environmental impacts, etc.). On the other hand, some of the suppliers are suppliers linked to certified forest associations. All requirements established for primary feedstock suppliers will correspond to the SBE requirements. The risk mitigation system is implemented, and Pellets Power, Lda. have planned to assess the conformity of all suppliers and new suppliers to SBE requirements. The private forest areas are smaller, the forestry companies operate for short periods in the same land areas. The existence of effective legislation and diligent procurement processes that guide industry and landowners on the sustainable management of forests, is also a strong support. Local communities' benefit from the economic impact of the management of forests activities. In conclusion, raw material supply for pellets production comply with SBP (01/02) requirements, for SBE.

5 Supply Base Evaluation process

To develop a SBE system, supply assessment and risk mitigation, procedures and actions been performed at Pellets Power, Lda. using internal staff to develop, complete and monitor the supply base evaluation (SBE). The SBE was developed by Pellets Power, Lda team, which have experience in environment, sustainability, quality and Portuguese wood and forest areas (FSC® /PEFC). External contribution has been given by health and safety subcontractor.

The development of the SBP SBE mitigation system is based on Environmental, Quality and Sustainability Manager experience with standards as ISO 19011, ISO/IEC 17025, ISO 9001 and ISO 14001, Enplus, Green Gold Label, Chain-of-Custody and Controlled Wood FSC® Certification.

Internal team allocated to this process (including – consultation) is composed by a MSc in Environmental Engineer, *a MSc* in Forest Engineer and a Degree in Wood Engineer.

Pellets Power, Lda. has the support of the same team which work on the first plant which had the SBP according STD01.

The Environmental, Quality and Sustainability Manager is the same in Pellets Power, Lda. and Pellets Power 2- Produção de Pellets, Lda., and in FSC® Multisite certification.

Risk assessment results, based on site visits and consultations with forest management/ logging and wood processing companies regarding mitigation measures, were subjected to public discussion, public consultation was carried out with non-governmental organizations and societies.

The supply risk assessment system includes an audit mechanism plan for risk assessment within the framework of the supply base. The plan and inspection criteria are available at the company only upon special request due to confidentiality considerations.

Stakeholders consultation started in 29 May 2019, by email.

113 relevant stakeholders have been consulted.

No answers to main indicators have been received.

6 Stakeholder consultation

The stakeholder's consultation process consisted of an analysis of the National area. Key stakeholders have been selected, taking in considerations their activities and knowledge in forest management or/and supply base of raw material.

Pellets Power, Lda. identified some of the suppliers that work in the region and provide raw material to the plant, as well as forest owners associations. At the same time was conducted a search of entities that could have a significant contribution and impact in these matters as national and state forest agencies, representatives of forestry certification schemes etc...

According to risk designation of risk we could have:

§ ***Low risk****:* An indicator shall be rated as low risk if there is a negligible risk of non-compliance with the indicator.

§ ***Specified risk:*** All indicators that cannot be classified as either low risk or unspecified risk are rated as specified risk. Mitigation measures are required for any indicator which is classified as specified risk.

§ ***Unspecified risk:*** An indicator shall be rated as unspecified risk if there is insufficient evidence available during the RA to categorise it as either specified risk or low risk. Note: An indicator can only be rated as unspecified risk during the RA.

The company sent an email to stakeholders on 29 May 2019, during 1 month. No responses were received.

This process revealed that some stakeholders are not generally concerned about the risk assessment or the harvesting activities associated with supplying raw material.

9 Specified risks were identified:

§ *2.1.2 Potential threats to forests and other areas with high conservation values from forest management are identified and addressed.*

§ *2.2.1 Feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them*

§ *2.2.2 Feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b).*

§ *2.2.3 Key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).*

§ *2.2.4 Biodiversity is protected (CPET S5b).*

§ *2.2.6 Negative impacts on ground water, surface water and water downstream from forest management are minimised (CPET S5b).*

§ *2.3.2 Adequate training is provided for all personnel, including employees and contractors (CPET S6d).*

§ *2.4.2 Natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b).*

§ *2.8.1 Appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12).*

No comments or responses to Pellets Power, Lda. stakeholder consultations were received during the SBE process consultation.

6.1 Response to stakeholder comments

N/A

7 Mitigation measures

7.1 Mitigation measures

Country:	Portugal
Specified risk indicator:	2.1.2 The BP has implemented appropriate control systems and procedures to identify and address potential threats to forests and other areas with high conservation values from forest management activities.
Specific risk description:	Potential threats to forests and other areas with high conservation values from forest management are identified and addressed.
Mitigation measure:	Before site visit the HCV information is search and identified; Fill the audit form; Fill the audit suppliers table vs risk results; If necessary mitigation with training or notify the suppliers and logging workers.
Country:	Portugal
Specified risk indicator:	2.2.1 The BP has implemented appropriate control systems and procedures to verify that feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them.
Specific risk description:	Feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them.
Mitigation measure:	Before site visit the information is search and identified; Fill the audit form; Fill the audit suppliers table vs risk results; If necessary mitigation with training or notify the suppliers and /or logging workers.
Country:	Portugal
Specified risk indicator:	2.2.2 The BP has implemented appropriate control systems and procedures for verifying that feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b)

Specific risk description:	Feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b).
Mitigation measure:	Before site visit the information is search and identified; Fill the audit form; Fill the audit suppliers table vs risk results; If necessary mitigation with training or notify the suppliers and /or logging workers; If necessary delivery an informative manual to suppliers with the good practices.
Country:	Portugal
Specified risk indicator:	2.2.3 The BP has implemented appropriate control systems and procedures to ensure that key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).
Specific risk description:	Key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).
Mitigation measure:	Before site visit the *ecosystems and habitats* information is search and identified; Habitats Directive; Before each site visit the HCV information is search and identified; Fill the audit form; Fill the audit suppliers table vs risk results; If necessary mitigation with training or notify the suppliers and logging workers (example *species* of *birds*, protected areas...).
Country:	Portugal
Specified risk indicator:	2.2.4 The BP has implemented appropriate control systems and procedures to ensure that biodiversity is protected (CPET S5b).
Specific risk description:	Biodiversity is protected (CPET S5b).
Mitigation measure:	Before site visit the *Biodiversity* information is search and identified; Fill the audit form; Fill the audit suppliers table vs risk results;

	If necessary mitigation with training or notify the suppliers and logging workers.
Country:	Portugal
Specified risk indicator:	2.2.6 The BP has implemented appropriate control systems and procedures to verify that negative impacts on ground water, surface water and water downstream from forest management are minimised (CPET S5b).
Specific risk description:	Negative impacts on ground water, surface water and water downstream from forest management are minimised (CPET S5b).
Mitigation measure:	Before site visit the information is search and identified; Fill the audit form; Fill the audit suppliers table vs risk results; If necessary mitigation with training or notify the suppliers and /or logging workers; If necessary delivery an informative manual to suppliers with the good practices.
Country:	Portugal
Specified risk indicator:	2.3.2 Adequate training is provided for all personnel, including employees and contractors (CPET S6d).
Specific risk description:	Adequate training is provided for all personnel, including employees and contractors (CPET S6d).
Mitigation measure:	Fill the health and safety audit form; Fill the audit suppliers table vs risk results; If necessary mitigation with training or notify the suppliers and logging workers; If necessary delivery an informative manual to suppliers with the good forest practices.
Country:	Portugal
Specified risk indicator:	2.4.2 The BP has implemented appropriate control systems and procedures for verifying that natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b).
Specific risk description:	Natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b).

Mitigation measure:	Before site visit the information is search and identified; Fill the audit form; Fill the audit suppliers table vs risk results; If necessary mitigation with training or notify the suppliers and /or logging workers; If necessary delivery an informative manual to suppliers with the good practices.
Country:	Portugal
Specified risk indicator:	2.8.1 The BP has implemented appropriate control systems and procedures for verifying that appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12).
Specific risk description:	Appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12).
Mitigation measure:	Fill the audit form; Fill the audit suppliers table vs risk results; If necessary mitigation with training or notify the suppliers and logging workers If necessary delivery an informative manual to suppliers with the good practices.

7.2 Monitoring and outcomes

Since September 2019, more than 40 field evaluations have been carried out. In these field evaluations, only observations were made, and whenever necessary, information was sent to suppliers in order to proceed as required. No non-conformities were observed, and the observations made were never recurrent. The supplier qualification matrix is kept up to date, with all the information obtained during the field evaluations, and the measures taken to improve the supplier's practices. At this moment, the result of audits was positive, and no risk are identified, it was not necessary mitigate, and the 8 suppliers evaluated are approved and the material wood can be considering, compliant. If in the future the result is negative in some indicators/risks, the material could not be sourced as compliant. Pellets Power, Lda, will work with the wood supplier to correct the situation and reinforce the implementation of corrective measures, will conduct training and will of the new audits suppliers to assess whether the improvements are sufficient and increase audits suppliers and check if the risk is mitigated.

8 Detailed findings for indicators

Detailed findings for each Indicator are given in Annex 1 in case the Regional Risk Assessment (RRA) is not used.

Is RRA used? No

9 Review of report

9.1 Peer review

Internal review by a Forest Engineer, Wood Engineer and the Environmental and Quality Manager.

9.2 Public or additional reviews

Report is available on Gesfinu company website www.gesfinu.com , for public disclosure. All requests, if any, by stakeholders shall be sent to company's e-mail address: raquel.coelho@gesfinu.com.

10 Approval of report

Approval of Supply Base Report by senior management			
Report Prepared by:	**Raquel Coelho**	**Environmental and Quality Manager**	**11 Nov 2020**
	Name	**Title**	**Date**
The undersigned persons confirm that I/we are members of the organisation's senior management and do hereby affirm that the contents of this evaluation report were duly acknowledged by senior management as being accurate prior to approval and finalisation of the report.			
Report approved by:	**Filipa Rebelo**	**Director**	**11 Nov 2020**
	Name	**Title**	**Date**

Annex 1: Detailed findings for Supply Base Evaluation indicators

	Indicator
1.1.1	The BP Supply Base is defined and mapped.
Finding	This SBP Regional Risk Assessment covers feedstock coming from material with origin in Mainland Portugal. In Mainland Portugal, private property from private owners (89%) and community (Baldios, 8%) correspond to 3,060 million hectares of forests (97% of total forest land), including 5.7% property of industry companies. Public areas are up to 3% (around 94,000 ha). Directorate-General for Territory (DGT) provides, in its webpage, maps with cartographic information for scales up to 1:50 000. Within the framework of the territorial planning instrument at municipal level, the Municipal Director Plan, several plants are provided at appropriate scale. The Geographic institute of the Army has the cartographic survey of the Portuguese Territory at a scale of 1:25 000. Regarding species, the most relevant in terms of pellets production are Pinus pinaster (Maritime pine/Pinheiro bravo) 23% of forest surface 714,000 ha, Eucalyptus spp. (Eucalyptus/Eucalipto) 26% of forest surface 812,000 ha and Pinus pinea (Stone pine/Pinheiro manso) 6% of forest surface 175,000 ha. [IFN6] It is important to highlight that Pinus Pinea is mainly used for the production of Pine nut and mostly the thinning and pruning by-products are used for pellet production. Pinus pinaster and Eucalyptus spp. are spread all around the country. Pinus pinea is more abundant in the South. All other species present in Mainland Portugal: Quercus suber (Cork oak/Sobreiro), Quercus ilex (Holm oak/Azinheira), Quercus spp. (Oaks/Carvalhos), Castanea sativa (Chestnut/Castanheiro), Fraxinus spp. (Ash/Freixo), Alnus glutinosa (Alder/Amieiro), are not commonly used for economical appliances. 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.
Means of Verification	- The Scope is defined and justified; - Maps to the appropriate scale are available; - Key personnel demonstrate an understanding of the supply base.
Evidence Reviewed	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) Inventario Florestal Nacional IFN5 (FloreStat_IFN5); ICNF portal (http://www.icnf.pt/portal/florestas/ifn/ifn5/rel-fin) Inventario Florestal Nacional IFN6, preliminary results (IFN6 – Resultados preliminares.pdf); ICNF portal (http://www.icnf.pt/portal/florestas/ifn/ifn6) Estatísticas Agrícolas 2015.xls, Instituto Nacional Estatística (https://www.ine.pt/xportal/xmain?xpid=INE&xpgid=ine_publicacoes&PUBLICACOESpub_boui=271434407&PUBLICACOESmodo=2) Decreto Law 16-2009 planos gestão florestal (https://dre.pt/application/dir/pdf1sdip/2009/01/00900/0026800273.pdf); ICNF portal (http://www.icnf.pt/portal/icnf/legisl/legislacao/2009/Decree-law-n.o-16-2009-de-14-de-janeiro.-d.r.-n.o-9-serie-i) Normas Técnicas Planos Gestão Florestal

	(http://www.icnf.pt/portal/florestas/gf/pgf/resource/doc/manual/normas-tecn-PGFAFN.pdf) Direção Geral do Território, http://www.dgterritorio.pt/ Centro de Informação Geoespacial do Exercíto, https://www.igeoe.pt/index.php?id=1
Risk Rating	Low Risk
Comment or Mitigation Measure	

	Indicator
1.1.2	Feedstock can be traced back to the defined Supply Base.
Finding	Information obtained from Centro Pinus (non-profit association for key players of Pine based industry), INE and others shows that pine wood consumption of timber industry in 2014 was 4,360,000 m3 (1,300,000 m3 saw mill industry, 30%; 300,000 m3 biomass, 7% and 1,400,000 m3 pellets, 32% and 1.360.000 other uses not relevant for pellets industry). However, in 2014 there was available only 2,247,000 m3 of pine wood from Mainland Portugal (Pinus pinaster). As an obvious conclusion a lot of imported pine comes into Portuguese timber industry in 2014, mostly from Spain. Similar situation occurs for Eucalyptus in pulp and paper industry, which low quality parts may be also used in biomass industry. Information from Annual Bulletin of CELPA (Paper Industry Association) states that in 2014 it was imported 45% of total eucalyptus wood procured by paper industry (2,415,000 m3 imported), in its vast majority round wood from Spain and at minor extent, chips from South America or Africa (usually FSC/PEFC certified or controlled). Based on the fact that relevant volumes of imported material come into Portugal annually it is relevant to note that imported material it is not covered by this RRA. A felling manifest (given notification 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). Specific regulations cover harvesting activities in the following cases: o 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; o 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); o 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); o 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 material until the arrival to 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 company fiscal number, headquarters address, name of the owner, main activity and email. o In public and community-owned forests, harvesting is authorized by ICNF (National Authority for

	Forestry and Nature Conservation). o 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 15 November). The mentioned specific regulations give the biomass producer the possibility to identify the provenance of the feedstock till 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 (Fiscal number, contacts) Localization of the feedstock at the freguesia (small village) 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 Guard], AT [Tax Authority] and other relevant entities, from 2014 to 2017, organized to inspect the application of the EUTR dispositions and only 1 infraction was identified. Operators, on 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 devolution 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 feeling (if one feeling 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 (Order of accountants): ♣ Name or company name of the seller of the goods ♣ Address of the seller ♣ Fiscal number of the seller ♣ Name or company name of the buyer of the goods ♣ Address of the buyer ♣ Fiscal number of the buyer ♣ Designation of the goods, including quantities ♣ Loading and unloading locations ♣ Date and hour when the shipment starts. Several public authorities, such as SEPNA (Department of National Guard responsible for environment surveillance), ASAE (National Authority for the Food and Economic Safety) and ICNF, organize regular surveillance activities to verify the compliance of forest operators and wood transportation companies with the dispositions of the National Action Plan for Control of Pinus Wilt Disease. In 2016, SEPNA inspected 24’535 vehicles carrying wood logs and pallets and identified 424 infractions (1,7%) from which 295 refer to the lack of NMP manifest (1,2%) [Activity Report 2016]. Conclusion: 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. On the above background, the risk related to the traceability of feedstock back to the supply base is evaluated to be low.
Means of Verification	Information obtained from Centro Pinus (non-profit association for key players of Pine based industry), INE and others shows that pine wood consumption of timber industry in 2014 was 4,360,000 m3 (1,300,000 m3 saw mill industry, 30%; 300,000 m3 biomass, 7% and 1,400,000 m3 pellets, 32% and 1.360.000 other uses not relevant for pellets industry). However, in 2014 there was available only 2,247,000 m3 of pine wood from Mainland Portugal (Pinus pinaster). As an obvious conclusion a lot of imported pine comes into Portuguese timber industry in 2014, mostly from Spain. Similar situation occurs for Eucalyptus in pulp and paper industry, which low quality parts may be also used in biomass industry. Information from Annual Bulletin of CELPA (Paper Industry

	Association) states that in 2014 it was imported 45% of total eucalyptus wood procured by paper industry (2,415,000 m3 imported), in its vast majority round wood from Spain and at minor extent, chips from South America or Africa (usually FSC/PEFC certified or controlled). Based on the fact that relevant volumes of imported material come into Portugal annually it is relevant to note that imported material it is not covered by this RRA. A felling manifest (given notification 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). Specific regulations cover harvesting activities in the following cases: - 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 material until the arrival to 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 company fiscal number, headquarters address, name of the owner, main activity and email. - In public and community-owned forests, harvesting is authorized by ICNF (National Authority for Forestry and Nature Conservation). - 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 15 November). - The mentioned specific regulations give the biomass producer the possibility to identify the provenance of the feedstock till 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 (Fiscal number, contacts) - Localization of the feedstock at the freguesia (small village) 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 Guard], AT [Tax Authority] and other relevant entities, from 2014 to 2017, organized to inspect the application of the EUTR dispositions and only 1 infraction was identified. Operators, on 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 devolution 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 feeling (if one feeling 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 (Order of accountants): - Name or company name of the seller of the goods - Address of the seller - Fiscal number of the seller - Name or company name

	of the buyer of the goods - Address of the buyer - Fiscal number of the buyer - Designation of the goods, including quantities - Loading and unloading locations - Date and hour when the shipment starts. Several public authorities, such as SEPNA (Department of National Guard responsible for environment surveillance), ASAE (National Authority for the Food and Economic Safety) and ICNF, organize regular surveillance activities to verify the compliance of forest operators and wood transportation companies with the dispositions of the National Action Plan for Control of Pinus Wilt Disease. In 2016, SEPNA inspected 24'535 vehicles carrying wood logs and pallets and identified 424 infractions (1,7%) from which 295 refer to the lack of NMP manifest (1,2%) [Activity Report 2016]. Conclusion: 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. On the above background, the risk related to the traceability of feedstock back to the supply base is evaluated to be low.
Evidence Reviewed	• 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.
Risk Rating	Low Risk
Comment or Mitigation Measure	

	Indicator
1.1.3	The feedstock input profile is described and categorised by the mix of inputs.
Finding	As described in previous indicators Primary Feedstock comes mainly from private properties and consist on several species: mainly Pines and Eucalyptus for pellets production and residual forest biomass for drying. Other sources of feedstock are by products from sawmills and other timber industry consisting on shavings, sawdust and chips. There is no specific legislation regulating classification of wood/timber harvested in Portugal in terms of species, quantities or qualities. Industrial use of Eucalyptus and Pines ensure that they are adequate classified and measured. Felling manifests require identification of species and volumes and are mandatory for every forest species for industrial use. 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. Based on the available information, the risk for this indicator has been assessed as Low.
Means of Verification	Copy of delivered felling manifest to Forest Authorities (ICNF) for all species used in industrial purposes Invoices Transport/shipping documents Waybills Feedstock input records
Evidence Reviewed	Estrategia Nacional das Florestas (https://dre.pt/application/file/66432612); ICNF portal (http://www.icnf.pt/portal/icnf/docref/enf) Inventario Florestal Nacional IFN6, preliminary results (IFN6 - Resultados preliminares.pdf); ICNF portal Decreto Law 174-1988 manifesto corte (https://dre.pt/application/file/374768); ICNF portal(http://www.icnf.pt/portal/icnf/serv/formularios/manif/man-cort-arrarvor) Decreto Law 198/2012 de 24/08 FATURAS E OUTROS DOCUMENTOS COM RELEVÂNCIA FISCAL (http://info.portaldasfinancas.gov.pt/NR/rdonlyres/907FD2F4-9A9C-485D-8A99-FD164BF9FCEC/0/Decree-law%20n%20_198_2012_24_08.pdf)
Risk Rating	Low Risk
Comment or Mitigation Measure	

	Indicator
1.2.1	The BP has implemented appropriate control systems and procedures to ensure that legality of ownership and land use can be demonstrated for the Supply Base.
Finding	In Portugal, land ownership and management is regulated in line with point 1_1_Legal rights to harvest. (Annex C2, FSC CW NRA). The Real Estate Cadastre (Cadastro Predial), the Finances Matrix (Matriz das Finanças) and the Real Estate Registry (Registo Predial) constitute an inseparable part of the management of property and of the rural and urban buildings, as well as of the acts practiced on them (building refers to any real estate property being that rural or urban, agricultural or forest, comprising edification or not): - 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, licenses, etc. The information is provided through the Internet in the webpage of General Directorate of Territory, here; - The Finances Matrix, which is divided into a rustic land matrix and urban land matrix, constitutes the fiscal inventory of all rural and urban properties of each village or county, to which it has to be reported, early or later, any acts that alter the features, change of use or owner, among others, in order to formalize these acts; - The Real Estate Registry, which takes place in the land registry office, is the official archive where all property rights and other rights as well as charges on the real estate are registered and confirmed, without updated knowledge of which no legal act (purchase, sale, Mortgage, etc.) can be carried out on a rustic or urban building, or on a part or fraction of such. 53% of 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 an unique Land Identification Number (DL 172/95). In the

	conservatory of the land registry (Conservatória do Registo Predial) the ownership of each building is officially registered as well as the identification of its owners and any other rights or obligations on the building or the easements that condition it are registered. In the books of the land registry, nowadays largely computerized, each registered building has a land description, where the attributes that correspond to it are inscribed and recorded. The real estate description has unique a numerical sequence followed by the date, with a brief description of the components of the building, its confrontations (delimitations) and the article of the matrix, in which the inscriptions of the owners of the property and other information is recorded. 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 legal related over 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 Predrial), which is an extract or datasheet from the Real Estate Matrix of the Finances Department. It is common knowledge that rustic and urban buildings are inscribed in the finances matrix, above all, because these services send, to the owner, a list of the respective articles each year (with the exception of properties not quoted in less value, as is often the case of rural properties), indicating the value of the property, the tax on the properties to be paid, called Property Municipal Tax (IMI). At the 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 (AutoridadeTributária 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 juridico…RJAAR). The institutions related to both forestry and agriculture have encouraged owners to update them. Portugal as a score of 80 in 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]. There are several legal instruments and procedures which allow the identification of illegalities related to illegal logging and legality of ownership. 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. It is also considered among the stakeholders that there are 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 processes during the period of 20 years (1,2,3) GNR [National Guard] was contacted to supply statistical data about offenses related to the legality of ownership and there is no registry of offenses. Through the evaluation of the findings the risk 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. 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, fiscal 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 fiscal authorities through invoicing, assuring the legality of ownership. In the case of illegalities, concerning theft or similar, there are legal procedures well implemented that allow the identification of the responsible. On top of that, there is no significant evidence, at the national level, of conflicts or disputes about land tenure and land management rights. All

	the instruments already applied by the biomass producers allow the traceability of the wood from the land to the factory gate.
Means of Verification	Description on the Land Registry (Descrição na Conservatória do Registo Predial) Content certificate matrix article of tax office (Certidão de teor do artigo de Matriz da repartição de finanças) & land notebook (Caderneta predial) is the fiscal document which confirms taxes payment. Judicial final decision without appeal right (Sentença judicial transitada em julgado). Forest Renting/leasing contract (Contrato de Arrendamento Florestal) For Collective or Comercial entities the extract from the commercial register (Certidão do Registo Comercial) to prove the specific responsibilities of owners/managers/presidents Purchase documents (invoice, buyer-seller contract, previous agreement) Approved RJAAR
Evidence Reviewed	Government sources: •Constitution (Constituição da República Portuguesa) •Cadastre at Direção Geral do Território: Non-Government sources • 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 rustica em Portugal";Fundação Francisco Manuel dos Santos eRodrigo Sarmento de Beires, May/2013 (https://www.ffms.pt/upload/docs/o-cadastro-e-apropriedade-rustica-emportugal_ypUM5ASBAUmUpHUlgJtp0A.pdf) http://elearning.ipca.pt/1213/pluginfile.php/82971/mod_resource/content/1/sumarios_reais_11_12.pdf
Risk Rating	Low Risk
Comment or Mitigation Measure	

	Indicator
1.3.1	The BP has implemented appropriate control systems and procedures to ensure that feedstock is legally harvested and supplied and is in compliance with EUTR legality requirements.
Finding	Regulation (EU) No 995/2010 (RUEM), of 20 October, entered into force in March 2013, and Decree-Law no. 76/2013, for its application in Portugal, was published on 5 Of June of the same year. The ICNF is the competent authority for the application of the EUTR in Portugal. Within the framework of the EUTR, two types of agents are defined: The Operator, understood as any singular or collective person who places on the market wood or wood products, and the Trader understood as any natural or collective person who in the course of a commercial activity sells or purchase on the internal market of the European Union (EU) wood or wood products already placed on the internal market. Operators must have due diligence system in place for each wood/timber acquisition, which includes procedures for access to information, risk assessment and risk mitigation. Traders must maintain relevant information about suppliers and buyers of products as well as volumes traded. This information must be kept and be provided to competent authorities upon request. Operators

	placing timber on the EU market for the first time should provide records of where the timber is originated, species, and quantities. 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]. The Competent Authority in Portugal for ensuring implementation of the EUTR is Institute for Nature Conservation and Forests (ICNF). The enforcement authority is the National Republican Guard (GNR) which conducts enforcement according to ICNF procedures. Since the start of 2015 a far-reaching regime of inspections has begun. From January 2015 to April 2016 ICNF has conducted 113 inspections with no contraventions. Also for the same period GNR has conducted 265 inspections with one contravention. 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. For cork oak, there is the cork production declaration form. The publication of legislation establishing protection measures for the cork oak and the holm oak – Decree-Law no. 169/2001, dated 25 May, art. 14 – makes the use of a new cork production declaration mandatory. The declaration is obligatory for all producers of raw cork that is to be sold or consumed by the producer. The declaration must be filed with the ICNF headquarters by 31 December in the year of extraction. The declaration of felling, pruning, and circulation of conifer wood, set out in article 6 of Decree-Law no. 123/2015, dated 3 July, must be obligatorily provided in advance whenever: 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 continental territory; b) it concerns the pruning of host conifers in continental territory. The new legal framework applying to the harvesting, transportation, storing, transformation, import, and export of Pinus pinea L. in continental territory, which was approved by Decree-Law no. 77/2015, dated 12 May, is effective as of 10 August 2015. The regulations require that the ICNF is given advance notice of any economic activity or operation involving the harvesting, transportation, storing, transformation, import, and export of Pinus pinea L. and that those carrying out such activities are registered. The legal framework applicable to the application of resin and the circulation of pine resin in continental territory was approved by Decree-Law no. 181/2015, dated 28 August. This law is effective as of 28 September 2015, with the exception of articles 6 to 9, 'prior notification' and 'registration of a resin operator', which are effective as of 1 January 2016. The regulations require that the ICNF is provided with advance notice of the extraction of pine resin, its import and export, as well as transportation, storing, and entry to an establishment for the first industrial transformation, and that resin operators are subject to registration. In Portugal, tariffs are not differentiated by species or quantity. The focus of the referred inspection activities is: - Cork Oak, Holm Oak and Holly operations and also riparian vegetation and protected areas; - Conversion from forest to plantations for areas larger than 350 ha or other uses for areas greater than 50 ha; - The National Action Plan for Control of NMP applies to all conifers and includes a strict phytosanitary plan which requires up-front registration of all operators and notification to authorities, prior to commencement of harvesting, transport and processing of wood (some of cuttings detailed on Action Plan are obligatory); - In the case of premature cutting licenses, no evidence was found in the ground of any implementation of this law. In 2016, SEPNA registered: - 247 infractions regarding the illegal cutting of protected species; - 295 infractions regarding the circulation of coniferous wood without the felling and thinning manifest; - 23 infractions related to the circulation of wood without mandatory documents such as invoices, delivery notes, among others. The number of surveillance activities which led to identification of the above infractions wasn't disclosed. 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.

Means of Verification	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: 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. 3) Risk minimization - by additional information, verifications if the evaluation reveals specified risks.
Evidence Reviewed	Implementation assessment (2013-2016) http://www.icnf.pt/portal/florestas/fileiras/resource/docs/ruem-nov2016 Cutting Permission in Law n.º 33/96, at 17/08 (article 7th) https://dre.pt/application/dir/pdf1sdip/1996/08/190A00/25682573.pdf Cork oak and Holm oak (Quercus suber and Quercus rotundifolia): - DL155/2004, de 30/06 - DL 169/2001, de 25/05 Ilex aquifolium: - DL 423/89, de 4/12 Pinus Nematode: - Dec.Retificação n.º 38/2015 de 01/09 - DL 123/15, at 3/07 - DL 95/2011, de 8/08 - DL 154/05 6/09 - Dec. n. 30-A/2011, de 7/10 Cuttings before mature of Pinus pinaster and Eucalyptus: - DL173/88,17/05 Harvesting manifest: - DL 174/88, 17/05 Municipal licenses 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 de 14/04 - DL 151-B/2013 de 31/10 https://dre.pt/application/file/513900 - DL 49/05, de 24/02 - DL 197/2005, de 8/11 Timber Operator Registry: - DL76/2013 at 5/06 - EUTR: DL nº76/2013 de 5/06 artºs 3º,8º at https://dre.pt/application/dir/pdf1sdip/2013/06/10800/0322203225.pdf - (UE)Regulation n.º 995/2010 artºs 4º, 5º, 6º http://www.icnf.pt/portal/florestas/fiLawras/resource/docs/reg/regulamento-995-2010 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 de Ambiente at http://apambiente.pt/index.php; - Municipalities at (http://www.cm-NAME.pt/); - SEPNA-Serviço da Protecção da Natureza e do Ambiente/GNR-Guarda Nacional Republicana at (http://www.gnr.pt/default.asp?do=5r20n/DF.zv55n1/Zv55n1) - Instituto da Conservação da Natureza e Florestas at page http://www.icnf.pt/portal/florestas/fiLawras/reg-op; - ICNF Report:(http://www.icnf.pt/portal/florestas/fiLawras/resource/docs/icnfruem)
Risk Rating	Low Risk
Comment or Mitigation Measure	

	Indicator

1.4.1	The BP has implemented appropriate control systems and procedures to verify that payments for harvest rights and timber, including duties, relevant royalties and taxes related to timber harvesting, are complete and up to date.
Finding	In Portugal it is not applicable payments for harvest rights and timber, including duties, relevant royalties and taxes related to timber harvesting such as stumpage fees and other volume based fees. Only taxes related to timber harvesting are applicable to all economic activities such as value added taxes (VAT) and income taxes (IRS and IRC). VAT (IVA) taxes: A normal tax rate of 23% VAT is applied to sale of wood. In special cases, a VAT reduction to 6% can be applied to the owner of 'standing wood' or 'standing stock sales'; or even VAT exemption if the owner is a farmer or forester. Invoices must be issued by the seller, but self-invoicing by the buyer may occur in exceptional circumstances if some conditions are met (previous agreement, data conformity, etc.). As no specific evidence of irregularity has been identified in relation to payment of VAT, this requirement is considered Low risk. The payment of VAT is a simple requisition that is easy to verify and legally undertake by both entities (seller and buyer). The exceptional regimes of reduced taxes or exemption are in place to include the cases of forest owners with special profiles as famer or forester. Income taxes (IRS & IRC): Income taxes are applied according to individual or collective fiscal laws. It was not found any specific evidence of irregularities about income taxes related to harvest companies. Fiscal Authorities are Autoridade Tributária, which makes join inspections on roads together with GNR- Guarda Nacional Republicana. In 2016, SEPNA (Department of the National Guard responsible for nature related activities) registered 26 infractions related to wood circulating without purchase invoice or delivery documents. According to the available information, this indicator is classified as low risk.
Means of Verification	Valid invoice/receipts Valid declaration of taxes non-debt IES_ Annual Declaration Proof of Annual declaration IRS/IRC Taxes Single Report
Evidence Reviewed	VAT Code CIVA: - DL n.º 102/2008, de 20/6: artº2º 1-a);artº9º 32)List I nº4. Anexo A- IV Individual Income Code to Singular Persons: - DL nº 442-A/88 artº4º nº3,nº4 Updated by Law nº67/2015, de 06/07 Preâ. nº9,artº3 nº1a);nº4; artº4º nº1, nº3 nº4 artº34º Comercial Income Code to collective entities - DLnº 442-B/88 Updated by Law n.º 2/2014 de 16/12, Law nº3/2014 de 16/12 & Law nº4/2014 de 16/12 artº1º, artº2º, artº 3º, artº18º-nº7 ; artº20º nº1 g) artº23º nº2 k) - Port. nº 55/2010 21/01 artº2º Government sources - Autoridade Tributária e Aduaneira at: https://www.portaldasfinancas.gov.pt/pt/home.action - Autoridade Tributária e Aduaneira: VAT Exemption and reduction at: http://info.portaldasfinancas.gov.pt/NR/rdonlyres/9A86386D-7EB8-447F-9EACCEB67C206BD2/0/INFORMA%C3%87%C3%83O.3526.pdf - Autoridade Tributária e Aduaneira: Self invoicing by the buyer: http://info.portaldasfinancas.gov.pt/NR/rdonlyres/A4FB3349-0071-47FC-97ECADE2061C094A/0/Informacao_5332.pdf
Risk Rating	Low Risk
Comment or Mitigation Measure	

	Indicator
1.5.1	The BP has implemented appropriate control systems and procedures to verify that feedstock is supplied in compliance with the requirements of CITES.
Finding	There are no trees in Portugal belonging to CITES appendices. Also it was not found any direct effect of harvesting or forest management over CITES listed species.
Means of Verification	List of purchased species
Evidence Reviewed	Portuguese legislation: - DL211/2009, 03/09, artº2º, artº4ºartº9º, artº13º - Port nº1225/2009 de 12/10 ; Portaria nº 1226/2009 de 12/10 - Port nº 7/2010 de 05/01 - Port. 60/2012 de 19/03 EU legislation: - Council Regulation (EC) No 338/97 of 9 December 1996 on the protection of species of wild fauna and flora by regulating trade therein, article 4, 5, 7, 8 (http://eurlex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:1997R0338:20080411:EN:PDF) - Commission Regulation (CE) 865/2006, 4th May - Commission Regulation (UE) 2017/160, 20th January - Date of CITES application on EU: JOUE L 189, de 2015-07-17 - European Union page at: http://ec.europa.eu/environment/cites/pdf/trade_regulations/KH7707262PTC.pdf CITES - 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	Low Risk
Comment or Mitigation Measure	

	Indicator
1.6.1	The BP has implemented appropriate control systems and procedures to ensure that feedstock is not sourced from areas where there are violations of traditional or civil rights.
Finding	Portugal and Portuguese forest sector is not associated with violent armed conflict, including that which threatens national or regional security and/or linked to military control. The country is not covered by a UN security ban on exporting timber or any other international ban on timber export, also there are not individuals or entities involved in the forest sector that are facing UN sanctions. Portugal is well positioned at all international reports: - Corruption Perception Index scores 63 meaning low perceived level of corruption; - Worldwide Governance Indicators (WGI) from 73.3 to 84.13 (1-100points). The WGI report six aggregate governance indicators for over 200 countries and territories over the period 1996-2014, covering i) Voice and Accountability, ii) Political Stability and Absence of Violence/Terrorism, iii) Government Effectiveness, iv) Regulatory Quality, v) Rule of Law, and vi) Control of Corruption. On the other side Portugal (including human rights, illegal logging, forest and timber) is not listed in alarming reports or indexes such as: - Committee to Protect Journalists Impunity Index; - Human Rights Watch; - Global Witness - Chatham

	House - Amnesty International There are not indigenous or traditional people in Portugal that could claim traditional rights to lands, forests and other resources, based on long established custom or traditional occupation and use. Labour rights are respected including rights as specified in ILO Fundamental Principles and Rights at work. Portugal has ratified all 8 Fundamental ILO Conventions. According to the available information, this indicator is classified as low risk.
Means of Verification	Identity card of workers. Valid written contract Valid visa and residence working permit for foreigners out of EU, Iceland, Liechtenstein, Norway, Turkey, Brazil (with equality rights status), Cabo Verde, Guiné Bissau, São Tomé e Principe. Obligatory insurance document. Updated document of social security payment IRS /IRC taxes - Relatório Único.
Evidence Reviewed	• Transparency International http://www.transparency.org/cpi2015#mapcontainer • UN Sanctions List at:https://www.un.org/sc/suborg/en/sanctions/unscconsolidated-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-withmurder.php • Human Rights Watch: http://www.hrw.org/world-report/2015 • Global Witness: www.globalwitness.org Chattam House Illegal Logging Indicators Country Report Card http://www.illegal-logging.info • Amnesty International:https://www.amnesty.org/en/documents/pol10/0001/2015/en/ Labour Code: • Law n.º 7/09 12/02 cap I and updates like Law 69/13, de 30/08 includes obligatory professional training (http://www.act.gov.pt/(ptPT)/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx • Republic Assembly Resolution nº109/2012 de 08/08 art 6º (Convention 184 doesn't apply to industrial forest work) • ILO Convention numbers 87, 98, 29, 105, 100, 101,129 e 138, 184 (http://dre.pt/util/getpdf.asp?s=diad&serie=1&iddr=2012.153&iddip=20121525 • Foreign workers: Law n.º 23/2007 at 04/07 artº59º 5a) and updates (http://www.pgdlisboa.pt/Laws/Law_mostra_articulado.php?nid=920&tabela=Laws&so_miolo • Labour Conditions Authority-ACT http://www.act.gov.pt/(pt-PT)/Paginas/default.aspx. • Ministry of Solidarity, Employment and Social Security http://www.portugal.gov.pt/pt/ministerios/mtsss.aspx • Employment and Professional Training Institute at https://www.iefp.pt/ • Ministry of Internal Administration http://www.portugal.gov.pt/pt/ministerios/mai/equipa.aspx Immigration And Boarders Services http://www.sef.pt/portal/V10/EN/aspx/page.aspx • SETAA-Sindicato da Agriculture, 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#mapcontainer • 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-withmurder.php • Human Rights Watch: http://www.hrw.org/world-report/2015 • Global Witness: www.globalwitness.org Chattam House Illegal Logging Indicators Country Report

	Card http://www.illegal-logging.info • Amnesty International:https://www.amnesty.org/en/documents/pol10/0001/2015/en/
Risk Rating	Low Risk
Comment or Mitigation Measure	

	Indicator
2.1.1	The BP has implemented appropriate control systems and procedures for verifying that forests and other areas with high conservation value in the Supply Base are identified and mapped.
Finding	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). Information on location and geographical distribution of nature conservation areas, rare, threatened and endangered species and habitats can be considered sufficient. 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). Using the definitions High Conservation Values provided by FSC forest management standard [9] the following attributes will be considered: 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. i) Classified areas [7]: The total classified area protected by the Rede Nacional de Áreas Protegidas (RNAP) and the Rede Natura2000 covers around 20 per cent of Portugal's continental territory. Classified areas comprise RNAP protected areas, sites from the national list [which includes sites of community importance (SICs)] and the Zonas de Protecção Especial para Aves (ZPE) of the Natura2000 network. Municipal protection areas must also be considered. Other classified areas are also protected by international commitments agreed upon by the Portuguese state (e.g. Ramsar Convention sites, biogenetic reserves, biosphere reserves). Although not included in classified areas, other areas come under this umbrella, such as Important Bird Areas (IBAs), sites of international importance for the conservation of birds on a global scale. (http://www.icnf.pt/portal/naturaclas/cart). ii) Endangered species according to the classification adopted by the International Union for the Conservation of Nature (IUCN) to endangered species: - Critically endangered (CR) - Endangered (EN) - Vulnerable (VU). - Protected species within the legal conservation instruments in force in Portugal 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 iii) Endemic species The Mediterranean basin, in which Portugal is found, contains around 25,000 species of plants, of which 50 per cent are endemic to the region. Of almost 4,000 species of flora listed for Portugal (continental, Azores, and Madeira), around 450 are Lusitanian endemism (444 in total; 143 on the continent, plus 76 from the Azores, 158 from Madeira, and 67 from Macaronesia), and 346 are endemic to the Iberian Peninsula. 3,314 species of flora are listed for the continent, 1,006 in the Azores archipelago, and 1,233 in Madeira. This is the

	region that shelters the highest number of endemism (species that do not exist elsewhere) – 157 in all. In the Azores the number reaches 78, while on the continent it is 150. As for invertebrates, information is scarce, but there are statistics for insects: so far, 402 taxa have been registered (369 species and 33 subspecies) which are recognized as Lusitanian endemism. iv) Critical 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); - Reproduction areas for birds of prey with threatened status; - Concentration of winter birds in wetlands; - Shelters for bats, considered important at a national, regional, and local level. - As for invertebrates, information is scarce, but there are statistics for insects: so far, 402 taxa have been registered (369 species and 33 subspecies) which are recognized as Lusitanian endemism. The vertebrate species identified as threatened are listed and described in the Redbook of Vertebrates from Portugal. Similar assessment has been done for Bryophytes in the Redbook of Bryophytes. A study aimed to identified and list the threatened flora is being develop at this moment. 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 identified 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 refugia i) Habitats Directive (2007-2012) Covers habitats listed in the Habitats Directive (Annex I) which, in the last national Habitats Directive report (2007–2012), were listed in categories (U1) – unfavourable inadequate – and (U2) – unfavourable bad. ii) Natura 2000 database Natura2000's sectorial plan is the main source of information used to identify habitats in classified areas. In the case of non-classified areas, the Habitats Directive implementation reports can be consulted for information on habitat conservation (favourable, unfavourable inadequate, unfavourable bad). iii) Portugal approved its ratification of the Convention on Biological Diversity (CBD) via DL no. 21/93, dated 29 June, which became effective in our country on 21 March 1994. 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 10x10 km scale), their conservation status (favourable, unfavourable, inappropriate, unfavourable, unknown) and major threats. http://www2.icnf.pt/portal/pn/biodiversidade/rn2000/dir-avehabit/rel-nac/relnac-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 importance 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/patrimoniomundial/portugal/ or http://www.rpmp.pt/#!sitios/cihc), of which only two are designated as outstanding natural landscapes ('Paisagem Cultural de Sintra', around 900ha, on the Portuguese mainland, and the 'Floresta Laurissilva na Madeira', on the island of Madeira, covering 15,000ha). The Iberian Risk Assessment also identified rocky landscapes such as the Vale de Foz Côa [Foz Côa Valley], the Douro slopes, and the landscape of Pico island, places that, analysed more closely, are not part of the forestry sector – see the results of the meeting of the working group for category 3 (5 July 2016). 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-nossopatrimonio-e-promover-a-criatividade/patrimonio-mundial-em-portugal). These are not yet included here. ii) Cultural heritage (Law no. 107/2001, dated 8 September) In Portugal there are specific governmental bodies to manage cultural heritage: the General Directorate of Cultural Heritage for the

	Portuguese Mainland (http://patrimoniocultural.pt/en/); Directorate of Services of Cultural Heritage for the Island of Madeira (http://cultura.madeiraedu.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/). 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 the scientific record. iii) Classified groves (Law no. 53/2012, dated 5 September) Additionally, the NRA WG has also looked at national legislation that identifies and protects outstanding grove (arboreta) (http://www.icnf.pt/portal/florestas/Arvores.qry?start:int=80&Distrito=&Concelho=&Freguesia=&Processo). The main source of information within this attribute is the application report of the Habitas Directive (2007-2012) as well as the description list of every habitat identified in the Annex 1 of Habitats Directive in Sectorial Plan of the Natura2000 network. Other cartographic information of HCV is included on open GIS like http://www.habeas-med.org/webgis/pt_en/ and http://epic-webgisportugal.isa.ulisboa.pt. Conclusion: 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 it is considered all the relevant findings of the FSC Controlled Wood National Risk Assessment from September 2018.
Means of Verification	Internet research GIS maps of HCV areas Interviews Priority Classified Habitat and species catalogue. Regional, publicly available data from a credible third party as FSC and PEFC Reports
Evidence Reviewed	Law for natural values cadastre: Decree-Law n.º 242/2015 at 15/10 https://dre.pt/application/conteudo/70693924 Bugalho, M. 2011 “Interpretação Nacional das Florestas de Alto Valor de Conservação” Documento de base Trabalhos realizados pelo GT IN FAVC do FSC Portugal HABEAS: http://www.habeas-med.org/webgis/pt_en/LEAF_EPICWebGiSPortugal: http://epicwebgisportugal.isa.ulisboa.pt/maps/epic?format=image/png;%20mode=8bit&startExtent=-1523000,4400000,-143668,5180000 SNAC : Legislation https://dre.pt/application/file/70698029 RNAP: http://www.icnf.pt/portal/ap/ap Reed Natura 2000: http://www.icnf.pt/portal/naturaclas/rn2000 Important Bird Areas of Portugal at: http://ibas-terrestres.spea.pt/ - Site characterization SIC e ZPE: http://www.icnf.pt/portal/naturaclas/rn2000/pset/Plan-setdocs Cartography: http://www.icnf.pt/portal/naturaclas/cart -Protected area plans: http://www.icnf.pt/portal/naturaclas/ordgest/poap -Data Base for fauna and flora specific plans: http://www.icnf.pt/portal/naturaclas/patrinatur/especies -Red book for Portuguese Vertebrates (2005): http://www.icnf.pt/portal/naturaclas/patrinatur/lvv - Nesting and wintering Bird Atlas on Portugal (2008): ND online Cartography (2015) http://webgis.spea.pt/AtlasAvesInvernantesMigradoras/ - Reptile and amphibious of Portugal (2008): http://www.icnf.pt/portal/naturaclas/patrinatur/atlas-anfi-rept/anfibios - Fresh water Fish National cartography :http://www.cartapiscicola.org/# - Flora identification: http://www.icnf.pt/portal/naturaclas/rn2000/p-set/psrnflora -Flora cartographic source: http://www.flora-on.pt/ -National Conservation Plano of threatened Flora information

	http://www.icnf.pt/portal/naturaclas/patrinatur/conserv-flora-perigo http://naturdata.com/index.php?option=com_content&view=article&id=78&Itemid=60 Electric wire line manual (ICNB 2008): http://www.icnf.pt/portal/naturaclas/ordgest/aa/resource/doc/man-infra-lin Regional Forest Plans (PROF): http://www.icnf.pt/portal/florestas/profs AIIF :http://www.aiff.org.pt/assets/ESTUDO_Prospetivo_-Sector-Florestal.pdf AIIF: http://www.aiff.org.pt/assets/Relatorio-de-Caracterizacao-da-FiLawraFlorestal-2014-160pCAPA-3-spread....pdf ICNF: http://www.icnf.pt/portal/florestas/ifn/resource/ficheiros/ifn/ifn6-resprelimv1-1 Planos de Gestão Florestal de areas públicas: http://www.icnf.pt/portal/florestas/gf/pgf/publicitacoes/encerradas Autoridade Florestal Nacional, 2010, Florestat – Aplicação para a Consulta dos Resultados do 5º Inventário Florestal Nacional. Disponível em http://www.icnf.pt/portal/florestas/ifn/ifn5/florestat Reserva Ecológica Nacional https://dre.pt/application/dir/pdf1sdip/2012/11/21200/0630806346.pdf Sistema Nacional de Defesa da Floresta Contra Incêndios: https://dre.pt/application/dir/pdf1sdip/2006/06/123A00/45864599.pdf PANCD https://dre.pt/application/file/65985917 PDR2020 http://www.pdr-2020.pt/site/O-PDR2020/Arquitetura/Area-3-Ambiente-Eficiencia-noUso-dos-Recursos-e-Clima/Medida-7-Agricultura-e-Recursos-Naturais/Acao-7.11- Investimentosnao-produtivos/Operacao-7.11.1-Investimentos-nao-produtivos Fundo Florestal Permanente: http://www.icnf.pt/portal/icnf/noticias/gloablnews/fundoflorestalpermanente-ffp Alves, A. M., Pereira, J. S., Correia, A. V., 2012. Silvicultura - A gestão dos ecossistemas florestais. Fundação Calouste Gulbenkian. ICNF http://www.icnf.pt/portal/florestas/aip/aip-monum-pt DRE: http://www.icnf.pt/portal/icnf/legisl/legislacao/2012/Law-n.o-53-2012-de-5-de-setembro.-d.-r.-n.o-172-serie-i
Risk Rating	Low Risk
Comment or Mitigation Measure	

	Indicator
2.1.2	The BP has implemented appropriate control systems and procedures to identify and address potential threats to forests and other areas with high conservation values from forest management activities.
Finding	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 habits accounting for 3.8% and 5%, respectively, of the total assessments. A similar assessment was performed, having species (except birds) as the scope and the numbers don't differ much. Forestry presents threat to 7.7% of the species assessed and puts pressure on 9.6% of the total 426 species considered. To put it into perspective, agriculture shown threat for 13.5% of habitats and 12% of species. Please refer to images below. Forest activities have a significant impact on bird attributes with 30% of the assessed species demonstrating to be threatened, as can be seen in the graphic dedicated to the subject (image 3). Image 1 Percentage of assessed habitats affected by one or more pressures/threats of high importance

	[1] Image 2 Percentage of assessed species (except birds) affected by one or more pressures/threats of high importance [1] Image 3 Percentage of assessed wintering and nesting birds affected by one or more pressures/threats of high importance [1] Forest owners make use of voluntary instruments, such as certification schemes recognized worldwide like Forest Stewardship Council (FSC) and Programme for the Endorsement of Forest Certification (PEFC), or they adopt practices in line with the “guidelines for sustainable forest management”, based on the work of the Technical Committee for Standardization nº 145/IPQ (Portuguese Standard NP 4406/2003) which applies pan-European criteria for the sustainable forest management as well as operational level guidelines. At the moment, more than 257 625 ha of forest were certified under PEFC scheme and 376 886 ha under FSC scheme. [1] There are, simultaneously, several private companies whose have been developing initiatives in order to promote the sustainable management of forest through the creation of forest owners’ groups willing to apply best management practices in their properties, and supporting them with preparation to apply for the certification with independent certification bodies. Here are a few examples of this initiatives: Abastena’s Forest Management Group, http://abastena.pt/ggfa.php Unimadeira, http://unimadeiras.pt/certificacao-gestao-florestal-em-grupo/ Silvitec: http://www.silvitec.com/files/190.pdf Terrateam: http://www.terrateam.pt APFC: http://www.apfc.pt/areas.php?aID=56 UNAC: http://www.unac.pt/projetos/certificacao-florestal.html Certificamais: http://www.certificamais.pt/ In Portugal, the bodies responsible for the inspection and surveillance are SEPNA and the Vigilantes da Natureza [Nature Rangers]. In some cases, the municipal authorities take responsibility for inspection themselves. At present, according to the rangers’ association, there are around 119 rangers on the continent, 33 in the Azores and 38 in Madeira; the APA – Agência Portuguesa do Ambiente (Portuguese Environment Agency) has 30 rangers and the CCDR - Comissões de Coordenação e Desenvolvimento Regional (Regional Commissions for Coordination and Development) 26. Each inspection is registered, though no annual reports have yet been identified. It’s under development the Special Program of the National Park Peneda-gerês (PEPNPG) through the Decree-law nº 96/2017 from May 18th. The PEPNPG aims to promote the development and application of conservation measures on several environmental attributes of the first protected area on the country (since 1971). Decrees-law nº 96/2017, 99/2017, 106/2017, 107/2017, 108/2017 set the start of the development of the Special Program of the following protected areas: Natural Park of São Mamede (PEPNSSM); Natural Park of Arrábida (PEPNA); Natural Park of Guadiana Valley (PEPNVG); Natural Park of Tejo Internacional (PEPNTI); Natural Park of Douro Internacional (PEPNDI); Natural Park of Serra de Aire e Candeeiros (PEPNSAC); Natural Park of Litoral Norte (PEPNLN); Natural Park of Montesinho (PEPNM); Natural Park of Sintra Cascais (PEPNSC); Natural Park of Ria Formosa (PEPNRF); Natural Park of Serra da Estrela (PEPNSE); Risk conclusion: HCV1 – Specified Risk As described in the 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 Montado of cork and holm oaks Landscape classified as HCV2 has potential threats that may cause the decline of montado (biotic and abiotic factores, lack of forest management), but the measures available to protect Montado 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 meet forest management measures themselves related to intensity of exploitation, such as the stripping and pruning. This regulation is well established and promoted. Is 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 the recent years. Certified forest of cork and holm oak account for and estimate 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 of are not fully known, since the full values of the last national inventory (IFN6) are still missing, however it is known that the class of "wooded area with cork oak" shown an increase of 6% from 1995 to 2010, and holm oak has decreased 3% in the same period. HCV 3 – Specified risk Referring to the data presented on image 1, 2, 3 (above) and the Information in the sectorial plan of Natura2000 and in the Third National Application Report of the Habitats Directive (2007–2012), specified risk is identified for habitats that are subject to threats originating on 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 21 March 1994. The Fifth National Report to CBD had as its main objective a review of implementation of the Convention and an assessment of how far we had come in achieving CBD objectives and the Aichi Biodiversity Targets contained in the Strategic Plan for Biodiversity 2011–2020. It also contributed to the development of the Global Biodiversity Outlook report and the review of the fulfilment of the EU Biodiversity Strategy for 2020. The report covers the state and tendencies of biodiversity and detected threats, reporting on actions taken towards fulfilling the Aichi Biodiversity Targets and finally sets out, based on experience, topics most deserving of attention in order to achieve a more adequate and broadreaching 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 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. 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. Within the national context, the structure of property, being extremely fragmented, reduces the dependence on ecosystem services and means this is not critical. Furthermore, the probability of forest management activities having a significant impact on the same service is negligible. Several legal instruments safeguard the functions of protection and regulate intervention in these areas. Examples of this are the Water Law [11], river basin plans (PBH) [12], public waters and dams planning (POAAP) [13], National Ecological Network [14], the Land law [15], etc. Not applicable, as no HCV4 is considered to exist at this scale. HCV 5 – Low risk Not applicable to Portugal. In Portugal, the use and enjoyment of common forest land is regulated (Law dos Baldios [common land law] – Decree-Law no. 165/2015, 17 August). At the present, this land is not indispensable to provide for the basic needs of the adjacent communities. HCV 6 – Low risk 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.
Means of Verification	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 Monitoring records Interviews with staff Publicly available information on the protection of the values identified Regional, publicly available data from credible third parties
Evidence Reviewed	[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/documentcenter/id/144 [7] Decree-Law 242/2015 of 15 October, https://dre.pt/application/conteudo/70693924 [8] Livro Vermelho dos Vertebrados, 2015, ICNF, http://www.icnf.pt/portal/naturaclas/patrinatur/lvv [9] Manual das Linhas Eléctricas, 2010, ICNB, http://www.icnf.pt/portal/naturaclas/ordgest/aa/resource/doc/doc_orient_linhaselectric_jul10_2 [10] FSC Principles and Criteria for Forest Stewardship, 2015, https://ic.fsc.org/en/document-center/id/59 [11] Natura 2000 sectorial Plan http://www.icnf.pt/portal/naturaclas/rn2000/pset [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-ecologicanacional Centre http://www.ccdrc.pt/index.php?option=com_content&view=article&id=2926&Itemid=191 Lisbon and Tejo Valley http://www.ccdr-lvt.pt/pt/reserva-ecologica-nacionalren/8395.htm Alentejo http://webb.ccdr-a.gov.pt/index.php/ord/ren Algarve https://www.ccdr-alg.pt/site/info/reserva-ecologica-nacional-ren [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___urbanis mo/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 n.º 242/2015 at 15/10 https://dre.pt/application/conteudo/70693924 Bugalho, M. 2011 "Interpretação Nacional das Florestas de Alto Valor de Conservação" Documento de base Trabalhos realizados pelo GT IN FAVC do FSC Portugal HABEAS: http://www.habeas-med.org/webgis/pt_en/LEAF_EPICWebGiSPortugal: http://epicwebgisportugal.isa.ulisboa.pt/maps/epic?format=image/png;%20mode=8bit&startExtent=-1523000,4400000,-143668,5180000 SNAC : Legislation https://dre.pt/application/file/70698029 RNAP: http://www.icnf.pt/portal/ap/ap Reed Natura 2000: http://www.icnf.pt/portal/naturaclas/rn2000 Important Bird Areas of Portugal at: http://ibas-terrestres.spea.pt/ Site characterization SIC e ZPE: http://www.icnf.pt/portal/naturaclas/rn2000/pset/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 amphibious of Portugal (2008): http://www.icnf.pt/portal/naturaclas/patrinatur/atlas-anfi-rept/anfibios Fresh water Fish National cartography :http://www.cartapiscicola.org/# Flora identification: http://www.icnf.pt/portal/naturaclas/rn2000/p-set/psrnflora Flora cartographic source: http://www.flora-on.pt/ National Conservation Plano of threatened Flora information http://www.icnf.pt/portal/naturaclas/patrinatur/conserv-flora-perigo http://naturdata.com/index.php?option=com_content&view=article&id=78&Itemid=60 Electric wire line manual (ICNB 2008) http://www.icnf.pt/portal/naturaclas/ordgest/aa/resource/doc/man-infra-lin Regional Forest Plans (PROF): http://www.icnf.pt/portal/florestas/profs AIIF :http://www.aiff.org.pt/assets/ESTUDO_Prospetivo_-Sector-Florestal.pdf AIIF: http://www.aiff.org.pt/assets/Relatorio-de-Caracterizacao-da-FiLawra- Florestal-2014-160pCAPA-3-spread....pdf ICNF: http://www.icnf.pt/portal/florestas/ifn/resource/ficheiros/ifn/ifn6-resprelimv1-1 Planos de Gestão Florestal de areas públicas: http://www.icnf.pt/portal/florestas/gf/pgf/publicitacoes/encerradas Autoridade Florestal Nacional, 2010, Florestat – Aplicação para a Consulta dos Resultados do 5º Inventário Florestal Nacional. Disponível em http://www.icnf.pt/portal/florestas/ifn/ifn5/florestat Reserva Ecológica Nacional https://dre.pt/application/dir/pdf1sdip/2012/11/21200/0630806346.pdf Sistema Nacional de Defesa da Floresta Contra Incêndios: https://dre.pt/application/dir/pdf1sdip/2006/06/123A00/45864599.pdf PANCD https://dre.pt/application/file/65985917 PDR2020 http://www.pdr-2020.pt/site/O-PDR2020/Arquitetura/Area-3- Ambiente-Eficiencia-noUso-dos-Recursos-e-Clima/Medida-7-Agricultura-e- Recursos-Naturais/Acao-7.11-Investimentosnao-produtivos/Operacao-7.11.1-Investimentos-nao-produtivos Fundo Florestal Permanente: http://www.icnf.pt/portal/icnf/noticias/gloablnews/fundoflorestal-permanenteffp Alves, A. M., Pereira, J. S., Correia, A. V., 2012. Silvicultura - A gestão dos ecossistemas florestais, Fundação Calouste Gulbenkian. ICNF http://www.icnf.pt/portal/florestas/aip/aip-monum-pt DRE: http://www.icnf.pt/portal/icnf/legisl/legislacao/2012/Law-n.o-53-2012-de-5-de-setembro.-d.-r.-n.o-172-serie-i
Risk Rating	Specified Risk
Comment or Mitigation	Before site visit the HCV information is search and identified; Fill the audit form; Fill the audit suppliers table vs risk results; If necessary mitigation with training or notify the suppliers and logging workers.

Measure	

	Indicator
2.1.3	The BP has implemented appropriate control systems and procedures for verifying that feedstock is not sourced from forests converted to production plantation forest or non-forest lands after January 2008.
Finding	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] 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 18 February 2016): “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 intervention 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: 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.” FSC forest management standard for Portugal will also be used for the definition of “plantation”: “Forested area resulting of 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: - Reduced number of species - Intensive forestry - Regular plant spacing - Regular settlements” FAO’s Global Forest Resources Assessment of 2010 [2] shows the following data regarding the Portuguese forest area: Primary forest: 0.8% Forest with the primary designated function of production: 59% Forest within protected areas 20% Planted forest 25% It is possible to assume that the remains of the 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, 15 October) which lead 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 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 (Law-decree nº173/88 from May 17th), regulations for the introduction and environmental control of non-indigenous species (Law-decree nº565/99 from December 21st) and mainly the mandatory previous authorization for afforestation and reforestation activities using short rotation crops (Law-decree nº175/88 from May 17th). Figure 1 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 this 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 the article nº9 of RJAAR defines that if an intervention occurs inside the National Ecologic Reserve, a consultation must be performed next to the relevant CCDR and municipality. The article nº10 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. The 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 were 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 30 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 on Pinus Pinaster converted to Eucalyptus. 4% of the referenced activities comprise the plantation of Eucalyptus on areas occupied by other, non-specified, species. Image 3 Afforestation and Reforestation actions authorized or validated by ICNF from October 2013 to December 2017 [source: ICNF] 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 nonconformity with 88% of the total cases. Conclusions: - 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 on afforestation activities for timber production and nontimber 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. Considering the information above, the risk is considered as low for this indicator.
Means of Verification	Historical maps and enquiries with stakeholders Regional, publicly available data from a credible third party Records of BPs' field inspections Monitoring records Aerial photos
Evidence Reviewed	[1] Pereira, João et al. (2009). Floresta. In: Pereira, H. M., Domingos, T., Proença, V., Vicente, L. & Rodrigues, P. (eds.) Ecossistemas e Bem-Estar Humano. Avaliação para Portugal do Millennium Ecosystem Assessment [Ecosystems and human well-being. Evaluation of the Millennium Ecosystem Assessment for Portugal] [2] Global Forest Resources Assessment 2010, FAO, Rome, 2010 [3] RJAAR Informative note nº8, ICNF, http://www2.icnf.pt/portal/florestas/arboriz/resource/docs/not-info/RJAAR-Nota-Informativa-n8.pdf [4] 6.º INVENTÁRIO FLORESTAL NACIONAL Legal Framework for Afforestation and reforestation activities (RJAAR), DL 96/2013, July 19th, http://www.icnf.pt/portal/florestas/arboriz/leg-reg Premature cutting of forest settlements: Law-decree nº173/88 from May 17th 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 Conversion inside Protected and Classified areas: DL142/2008 at 24/07 Artº 43º https://dre.pt/application/dir/pdf1sdip/2008/07/14200/0459604611.PDF DL 49/05 24/02 https://dre.pt/application/dir/pdf1sdip/2005/02/039A00/16701708.pdf Destruction of natural riparian vegetation: Law 58/2005 29/12; Law 54/2005,at 15/11 (Artº 25º) https://dre.pt/application/dir/pdf1sdip/2005/11/219A00/65206525.pdf Conversion from natural Ilex aquifolium DL423/89, 4/12 (Artº 1) https://dre.pt/application/dir/pdf1sdip/1989/12/27800/52915292.pdf Conversion from natural landscapes and hillside/slope erosion: DL 139/89 28/04 artº1 http://www.icnf.pt/portal/icnf/faqs/arbor/dl139-89 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
Risk Rating	Low Risk
Comment or Mitigation Measure	

	Indicator
2.10.1	Genetically modified trees are not used.
Finding	In Portugal there is not a specific legal framework for GMO trees, but for all vascular plants. This legislation doesn't prohibit commercial use of GMO plants which is legal in the country since 1999. However, only corn (maize) is cultivated (around 6% of the total production). It hasn't been found any recent trial of GM trees in the country. Only related notice was from 1997 when Stora Enso trialled a modified variety of Eucalyptus globulus, which was concluded on 2001. The company (Stora Enso) is no longer in Portugal, but is still an

	industrial global pulp and paper player with interests in GMO. A low risk conclusion is justified because it was not evidenced interest for GMO use in the forestry sector.
Means of Verification	List of species used. EU Register of authorised GMOs http://ec.europa.eu/food/dyna/gm_register/index_en.cfm
Evidence Reviewed	• DL 55/2015 at 17/04 http://apambiente.pt/_zdata/Politicas/MGM/DL%2055_2015.pdf • DL 72/2003 de 10/04 (http://apambiente.pt/_zdata/Politicas/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 Veternária webpage: http://www.dgv.minagricultura.pt/portal/page/portal/DGV/genericos?generico=3665233&cbousi=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	Low Risk
Comment or Mitigation Measure	

	Indicator
2.2.1	The BP has implemented appropriate control systems and procedures to verify that feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them.
Finding	Portuguese Legal system defines a forest management and planning framework which includes three levels: I) Regional Forest Plans (PROF) are instruments of sectorial politic for regional level. PROF set general guidelines for intervention, use and forest exploration with the goal to promote and guarantee the sustainable production of every products and services, preserving the objectives of National Forest Strategy (ENF). PROF are binding for administrative authorities, at all levels. - PROF are, at the moment, under revision and from the proposed documents put under public consultation was possible to verify a general decrease in the minimum area threshold for the obligation to have an approved PGF. Moreover, PROF will define maximum threshold for continuous cutting and single specie regular settlements. II) Forest Management Plans (PGF) are tool for the management of forest areas at forest unit/exploration level, following the guidelines set by the applicable Regional Forest Plan. PGF set, in time and space, the nature of concrete interventions and exploration of the existing resources in the forest unit, aiming to the sustainable production of products and services, considering the activities and uses of the surrounding areas, as well as the existing restrictions of legal and binding character. III) Specific Plans for Forest Intervention (PEIF) are instruments that produce specific measures for the intervention on forest areas with major biotic problems (e.g.: invasive species, plagues or diseases) or abiotic (e.g.: high risk of forest fire). 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 organism 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 n. 127/2005, from August 5th, in the wording of Decreelaws 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, ex: Proder program) for forest management or afforestation. This obligation was in force until February 2014. 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 to ensure the compatibility and contribution of the proposed interventions in the PGF for the conservation of protected species and habitats, whose favourable conservation status depends on the forest management. PGB must consider the applicable dispositions of the PSRN2000 (Sectorial Plan for the Natura 2000 network), as well as other applicable plans and regulations (e.g. Protected Areas management plans and regulations; Territory planning). Support documentation for forest owners and managers is available. 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 planers on the preparation and implementation of forest projects and operations, aiming to ensure their compatibility with the existing natural values and even contribute for the improvement of their conservation status. 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 on indicators 2.1.2, 2.2.2, 2.2.6. Municipal Planning documents contain mandatory rules that must be observed. Decree-law nº151-B/2013 [4] Defines the obligation to perform an Environmental Impact Assessment (AIA) on every afforestation and reforestation occurring on areas greater than 350ha (70ha on sensitive areas) or greater than 140ha (30ha in sensitive areas) if the subject area, in conjunction with pre-existent forest stands of the same species, separated by less than 1 km, would produce a continuous forested area of more than 350ha (70ha in sensitive areas). It also establishes that an AIA must be called when there is a deforestation action on areas greater than 50ha (10ha in sensitive areas). PROF, in several regions (Alto Minho, Baixo Minho, Barroso e Padrela, Nordeste Transmontano), also define a maximum threshold for clear cutting of 10ha. [5] Decree-law nº 96/2013 (RJAAR) [2] states that afforestation and reforestation actions above 2ha must be preceded of an authorization from ICNF (article nº4). Some exceptions to the above are possible, but constraints are defined on article 5 of this Decree-law. It's important to highlight that there is no exception for previous authorization when the area in question is located total or partially inside SNAC. Article nº9 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. The article nº10 defines the factors that should be taken into account in the decision making process including protection of forest against forest fires, hydric related issues, biodiversity and habitat protection, among others. In the case of river basins, information relating to the classification of flood plains, areas threatened by floods and other relevant information can be partially obtained by consulting areas included in the

	National Ecologic Reserve (REN). River basin plans (PGBH) also contain information relevant, as do PROFs, especially where they refer to protection forests. For information about erosion control it is essential to consult documentation relevant to the risk of erosion. Some of this information is contained in the REN, which identifies, on a scale of 1:25 000, areas at high risk of erosion, as well as zones of instability. Status of the implementation of Forest Management Plan [PGF in PT]: Data from 2013 shows 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. A FMP is applied on 45% of the Pinus Pinea area, 35% of the eucalyptus area, an 25% of the Pinus Pinaster area. (source) In the National Strategy for Forests – revision of 2015, it is defined an objective on which 100% of the forest area managed by ICNF shall have an approved PGF by 2017. In the case of community managed forest (Baldios) an approved PUB (specific FMP for this type of management) is in place on 60% of the total area. Around 25% of the areas with PGF are encompassed in the National System of Classified Areas – SNAC – which consists in Protected Areas (AP), Natura 2000 network sites, Biosphere Reserves, Ramsar sites, among others and, thereby, a Biodiversity Management Plan must be prepared. From October 2010 to April 2013, approved PGF areas increased from 386 300 hectares to 1 522 195 hectares. 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 about 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. 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 on 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 same species. Risk Conclusion: 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: o This possibility is temporary, as the number of approved management plans has increased significantly in the past decade; o Such risks have a limited impact on forest resources as they are not directly related to forest harvesting; o 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. Low risk is assessed for areas with dimensions above the threshold for the obligatory implementation of Forest Management Plan (refer to relevant PROF). Specified risk is considered for all the remain areas.
Means of Verification	Approved EIA when applicable. Approved Forest Management Plan when applicable SNAC framework Records of oil and hazardous chemicals deliveries. Manifest Records of BPs' field inspections Monitoring records Regional Forest Plan
Evidence Reviewed	National Strategy for Forests revision in 2015: https://dre.pt/application/file/66432612 Forestry Good Practices Handbook: http://www2.icnf.pt/portal/florestas/gf/documentostecnicos/resource/doc/Boas-Praticas-Florestais.pdf 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 Public authority sources • Instituto da Conservação da Natureza e Florestas at http://www.icnf.pt/portal • APA-Agência Portuguesa de Ambiente at http://apambiente.pt/index.php • Municipalities at (http://www.cm-NAME.pt/) Legislation: National Ecological Reserve • DL 239/12 at 2/11 artº20ºnº1 e) EIA • DL 151-B/2013 de

	31/10 artº 1º nº3 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 DL nº 47/2014, 24/03 31/10 DL nº 179/2015, 27/08 artº2º • Environment Law de Bases de Política do Ambiente: Law n.º 19/14 de 14/04 artº10ºd) DL nº49/05, de 24/02 artº20º • DL 197/2005, de 8/11 artº 1º, nº3 b) e nº4 Forest fire areas: • DL nº55/2007, de 12/03 artº1º • Law n.º 54/91, de 8/08 • DL nº34/99, de 5/02 artº1º • Ministry Council Resolution nº 5/2006, de 18/01
Risk Rating	Specified Risk
Comment or Mitigation Measure	Before site visit the information is search and identified; Fill the audit form; Fill the audit suppliers table vs risk results; If necessary mitigation with training or notify the suppliers and /or logging workers.

	Indicator
2.2.2	The BP has implemented appropriate control systems and procedures for verifying that feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b)
Finding	National Forest Strategy (2015) [4] states (chapter 2.2.5): “The susceptibility to desertification, which in terms of the Convention is defined by the aridity index threshold and, in particular in Portugal, corresponds to the 'Semi-arid' and 'dry sub-humid' classes, covers 58% of the continent in the last three decades (1980/2010) and 63% in the last decade (2000/2010) (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. 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).” Holm oak, cork oak and stone pine settlements comprise trees with different ages and sizes which represent a major asset for the control of erosion, mainly in the south region of Portugal. Since these tree species aren’t used primarily for timber production, being even common their continuous maintenance until decay, added to the fact that the areas of stone pine and cork oak are increasing in Portugal, a positive trend to control soil degradation is visible. Interventions in settlements of these species occur on a relatively long time-frame and, therefore, plants play an important role on controlling soil erosion. Figure 1 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 production energy, since the site (soil) presents sufficient resilience to nutrient removal...". In the other two referenced studies [7][8], direct relationship between biomass removal and degradation of soil quality is not achieved. Both authors put it as a hypothesis, lacking a longer term assessment, as Madeira, M. did as a result of its 30 years study. Law nº 31/2014 [1], May, 30th defines the general basis for the public policy on soils, territory planning and urbanism and sets a goal of enhancing the potential of agricultural, forestry and forestry areas, among other broader objectives. It sets, as objective of territory planning: “The preservation of soils with potential for agriculture, livestock or forestry, nature conservation, tourism and leisure, the production of renewable energies or the exploitation of geological resources in such a way that the allocation of such soils to other uses is restricted to situations where it is effectively needed and is duly proven” Law nº33/96, August 17th – Base Law for Forest Policy determines that the national forestry policy pursues the objective of "... ensuring the fundamental role of forests in regulating water resources, soil conservation and air quality and combating desertification...". 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 varzeas, as well as for the valorisation of ridges, moorlands and arid plains and benefit of the climate, or for the fixation and conservation of the soil, 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 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 specified.
Means of Verification	Best Management Practices; Records of BP’s field inspections; Assessment at an operational level of measures designed to minimise impacts on the values identified Level of enforcement Regional, publicly available data from a credible third party Erosion and desertification programs and maps Approved RJJAR Approved Forest Management Plan
Evidence Reviewed	[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-florestenaac [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.MadeiraSpanish%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]

Risk Rating	Specified Risk
Comment or Mitigation Measure	Before site visit the information is search and identified; Fill the audit form; Fill the audit suppliers table vs risk results; If necessary mitigation with training or notify the suppliers and /or logging workers; If necessary delivery an informative manual to suppliers with the good practices.

	Indicator
2.2.3	The BP has implemented appropriate control systems and procedures to ensure that key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).
Finding	Most important forest areas with high concentration of nature conservation values have been identified and designated as classified or protected areas at national and/or EU level (Natura 2000 sites) as described in the indicator 2.1.1 and 2.1.2. 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. 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. 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 until 2020 – the country is implementing several initiatives directed to each Target, which are described in detail on this report, however several issues are identified that need to be addressed in the next years, such as improvements on the: i) implementation of strategic guidelines namely the National Strategy for Nature and Biodiversity Conservation; ii) integration of biodiversity issues at 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 has impact. Those priority habitats were targeted with LIFE Projects. [FSC-NRA-PT V1-0] Reference should be made to the development of the Biodiversity Information and Monitoring of north of Portugal (SIMBioN), developed by the ICNB, IP, and by CIBIO, which had, among its objectives, to provide the ICNB, IP with a tool to support biodiversity management and contribute to scientific knowledge and public dissemination of biodiversity. Conclusion: It is important to highlight that, as stated before on 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 “high importance” threat (future) in 6 habitats and pressure (current) on 8 habits accounting for 3.8% and 5%, respectively, of the total assessments. 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 asspecified for the habitats identified as unfavourable where forest related activities present pressures and threats.
Means of Verification	Best Management Practices Supply contracts Assessment of potential impacts at operational level and of measures to minimise impacts Monitoring results Publicly available information on the protection of the identified values Regional, publicly available data from a credible third party
Evidence Reviewed	[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-esforcoconstante 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/pro g-abri-sub1988-2012v3 [5] http://www.icnf.pt/portal/naturaclas/patrinatur/resource/docs/Mam/morc/mor c-crit-aval-abrig [6] http://www.spea.pt/pt/estudo-e-conservacao/censos/censo-de-avescomuns/ [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/avesnoturnas/ 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-avehabit/ resource/doc/National_Summary_for_Article%2012%20_%20PT.pdf
Risk Rating	Specified Risk
Comment or Mitigation Measure	Before site visit the ecosystems and habitats information is search and identified; Habitats Directive; Before each site visit the HCV information is search and identified; Fill the audit form; Fill the audit suppliers table vs risk results; If necessary mitigation with training or notify the suppliers and logging workers (example species of birds, protected areas...).

	Indicator
2.2.4	The BP has implemented appropriate control systems and procedures to ensure that biodiversity is protected (CPET S5b).
Finding	Relevant biodiversity attributes are identified on indicator 2.1.1, specifically on HCV1. The threats are described on 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. 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. Forestry presents “high importance” threat to 7.7% of the species assessed and puts pressure on 9.6% of the total 426 species considered. 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.A number of monitoring programs have been implemented for certain species as representatives of a given taxonomic group that may integrate the set of indicators of progress achieved towards a significant reduction in the rate of biodiversity loss. ICNF coordinates several long term monitoring programs addressed to several species and group of birds: □ National program for monitoring of winter waterfowl, for species highly dependent on wetlands. This program is in force since 1976. This project comprises the annual assessment of the population and distribution of Anseriformes and Gruiformes species. [2] □ Stations of constant effort project. Has the objective of monitoring the population alterations of Passeriformes e quasi-Passeriformes species with wide distribution. [3] Specific monitoring actions at regional level: □ Monitoring scheme of rupicolous birds (Gyps fulvus, Neophron percnopetrus, Hieraaetus fasciatus, Aquila chrysaetos, Ciconia nigra, Bubo bubo, Oenanthe leucura) nesting species of the Serra de S. Mamede Natural Park; □ Annual monitoring scheme for birds of prey in the Lagoa de Santo André and Sancha Natural Reserve; □ Monitoring scheme of Glareola pratincola and Sterna albifrons nesting in the Tagus Estuary Natural Reserve; □ Monitoring scheme of Larus audouinii nesting in the Reserva Natural de Sapal de Castro Marim and Vila Real de Santo António; □ Monitoring scheme of Hieraaetus fasciatus, Falco peregrinus, Apus melba, Phalacrocorax aristotelis and Accipiter nisus in the Sintra-Cascais Natural Park; □ Scheme for the monitoring of rockhoppers (Gyps fulvus, Neophron percnopetrus, Hieraaetus fasciatus, Aquila chrysaetos, Ciconia nigra, Falco peregrinus) Douro International Natural Park; □ Monitoring scheme of nesting Hieraaetus fasciatus in ZPE Vale do Guadiana and Castro Verde and adjacent areas; □ Monitoring scheme of nesting Ciconia nigra in ZPE Vale do Guadiana; □ Autumn and spring counts of Pterocles orientalis in the Vale do Guadiana and Castro Verde EPZs; □ Monitoring scheme of nesting Falco peregrinus in ZPE Costa Sudoeste; □ Grus wintering monitoring scheme in the Vale do Guadiana and Castro Verde EPZs and adjacent areas; □ Monitoring scheme of Larus michahellis, Phalacrocorax aristotelis and Uria aalge in ZPE Berlengas Islands; □ Scheme for the monitoring of seabirds in the Natural Reserve of the Lagoons of Santo André and Sancha. At the national level, other monitoring projects have been carried out since 2010, oriented to different taxonomic groups: □ Action Plan for the Conservation of Iberian Lynx The Action Plan defines strategies for action, and its ultimate goal is to enable the conservation of the species in the national territory, reversing the process of continued decline of populations and recovering the nuclei of the species. In addition, it establishes a strategic model for the implementation of the breeding program in captivity, the recovery and maintenance of the favourable habitat, and the reintroduction of specimens of the species in suitable territories. Among other aspects, itemphasizes 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 the national level, and an annual estimate is made of the actual numbers present. A recent analysis of data collected between 1988 and 2012 includes population trends of seven species calculated using TRIM software. [4] The use of updated criteria to evaluate shelters of national importance that there are currently 76 major shelters (3 important ones throughout the year, 43 hibernacula and 40 maternities). [5] □ CAC (Censo de Aves Comuns), a long-term monitoring program for common birds and their habitats in Portugal. Launched by the Portuguese Wild Bird Society (SPEA) in 2004, in mainland

	Portugal and Madeira, and in 2007 in the Azores. It is integrated into the Pan-European Common Bird Monitoring Scheme (PECBMS). [6] This census received public support in 2009 and 2010. It continues to be carried out annually but lacks funding, namely for processing and analysis of data, reporting of results and support to the network of volunteers, which has made unfeasible the provision of Common Bird Indexes (IACZA, IACZF, etc.) to the public administration. These indexes are published until 2009. After 2009, only CAC reports are available, which only contain information disaggregated by species; [7] □ CANAN (Bird counts at Christmas and New Year), monitoring of population trends of wintering bird species in Portugal's agricultural fields; [8] □ NOCTUA-Portugal, monitoring of nocturnal birds; [9] □ RAM, network of observation of birds and marine mammals; [10] □ Project Arenaria, monitoring the distribution and abundance of birds on the beaches and coasts of Portugal; □ Monitoring scheme of the bustard (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 to the animal passage; As a contribution to the establishment of a reference framework for species, the most important are the Portuguese Atlas of Bats, the Winter Migratory Birds, the Atlas of Nesting Birds in the Madeira Archipelago, the Atlas of Birds (In prep.) And the 6th volume of the Madeira Biodiversity collection: Evaluation and Conservation of the native terrestrial vertebrates of the Madeira and Selvagens Archipelagos - Reptiles and Mammals. The project of the Atlas of Bats of Portugal (continent), which involved about 150 volunteers, had as main objectives to map the current distribution of the 25 species of bats with known occurrence in mainland Portugal, to fill a base of data to make this information available to stakeholders and, together with the 2011-2012 Year of the Bat campaign, mobilize and encourage practitioners in this area to educate the public about the importance of bats in ecosystems. Based on the evidences presented on indicators 2.1.1, 2.1.2 and 2.2.3 it is possible to conclude that forestry activities and feedstock supply represent specified risk for biodiversity attributes in Portugal.
Means of Verification	Best Management Practices Supply contracts Assessment of potential impacts at operational level and of measures to minimise impacts Monitoring results Publicly available information on the protection of the identified values Regional, publicly available data from a credible third party
Evidence Reviewed	Evidences of described in the 2.1.1, 2.1.2 and 2.2.3.
Risk Rating	Specified Risk
Comment or Mitigation Measure	Before site visit the Biodiversity information is search and identified; Fill the audit form; Fill the audit suppliers table vs risk results; If necessary mitigation with training or notify the suppliers and logging workers.

	Indicator

2.2.5	The BP has implemented appropriate control systems and procedures for verifying that the process of residue removal minimises harm to ecosystems.
Finding	Adding to the findings of indicator 2.2.2 on soil quality. In Portugal forest residues removal from forests is regulated so loggers and owners have some legal obligations, related with both fire and phytosanitary policies. These obligations are depending on species, areas, seasons and regions. Depending on forestry procedures and forest models, the solutions adopted about forest residues are a) integrating them on soil; b) remove them or c) burn them in appropriated season. All of these operations include advantages and disadvantages according to the focus of the overview. In the case of removal, it is always considered the harm to the remaining forest, soil, fauna and flora. Process of forest residue removal is commonly included on Best Practices but also on wood supply contracts, and forest land leasing. Based on the available information this indicator is considered low risk
Means of Verification	Best Management Practices; Records of BP's field inspections; Assessment at an operational level of measures designed to minimise impacts on the values identified Level of enforcement of legal framework
Evidence Reviewed	National System for Forest Fire Prevention: https://dre.pt/application/dir/pdf1sdip/2006/06/123A00/45864599.pdf Good Forest Practices http://www.icnf.pt/portal/florestas/gf/documentostecnicos/resource/doc/Boas-Praticas-Florestais.pdf Pinus Wilt Disease: •Dec.Retif. n.º 38/2015 de 01/09 •DL 123/15, at 3/07 •DL 95/2011, de 8/08 •DL 154/05 6/09 •Dec. n. 30-A/2011, de 7/10
Risk Rating	Low Risk
Comment or Mitigation Measure	

	Indicator
2.2.6	The BP has implemented appropriate control systems and procedures to verify that negative impacts on ground water, surface water and water downstream from forest management are minimised (CPET S5b).
Finding	Forest resources have a positive impact on water resources, compared with other land uses, such as agriculture. In the case of river basins, information relating to the classification of flood plains, areas threatened by floods and other relevant information can be partially obtained by consulting areas included in the National Ecologic Reserve (REN). River basin plans (PGBH) also contain information relevant, as do PROFs, especially where they refer to protection forests. For information about erosion control it is essential to consult documentation relevant to the risk of erosion. Some of this information is contained in the REN, which identifies, on a scale of 1:25.000, areas at high risk of erosion, as well as zones of instability. National Ecological Reservation is a territory classification of sensitive areas for "ecosystem services" where water issues are addressed, and some restrictions are in place to prevent negative impacts in slopes, valleys and other sensible situations. Every forest projects and plans must comply with

	this regulation, and they should be in place, for example in projected soil preparation techniques. ICNF Handbook for forest best practices defines: “In the areas surrounding the water lines the risk of erosion is often very high, since these are areas of concentration of rainwater runoff. In these bands (with a minimum width of 10 meters for each side, as stated in the legal definitions and conditions of legal limits (Decree-Law no. 468/71, of 5 November) 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.” 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. Decree-law nº 139/89, April 28th establishes the legal framework for the protection of natural declination, arable soil and vegetation cover. Decree-law nº151-B, July 19th defines the obligation to perform an Environmental Impact Assessment on every afforestation and reforestation occurring on areas ≥ 350ha (70ha on sensitive areas) or ≥140ha (30ha in sensitive areas) if the subject area, in conjunction with pre-existent forest stands of the same species, separated by less than 1 km, would produce a continuous forested area of more than 350ha (70ha in sensitive areas). It also establishes that an Environmental Impact Assessment must be done when there is a deforestation action on areas ≥ 50ha (10ha in sensitive areas). PROF in northern regions (21% of the territory) defines a maximum are for clearcuttings of 10ha. Coelho, Inocêncio identifies typical distribution of the Forest private property on several regions of the Portuguese mainland where only Alentejo and Ribatejo regions show an average property size above 7ha per owner and more than 50% of the properties with more than 100ha. For properties with dimensions above 100ha it is mandatory to prepare and submit a Forest Management Plan to be analysed by ICNF which comprises strategies to minimized impact on water resources created by forest operations. The forest operations occurring on other regions of the country, mainly above Tagus river, where more than 50% of the properties have less than 10ha and average sizes ranging from 1,46 to 2,83ha per owner, will unlikely spread across areas greater than 10h, due to the fragmentation of the rural real estate. 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 nº528/89, July 11th) Mandatory low density of settlements on afforested and reforested areas Advice on the species considered as appropriate to a defined location; Use of heavy machinery limited to no less than 10 meters from the water line Clear cutting operations and management activities must be previously authorized by the municipality. 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 Tagus river, where the implementation of Forest Management Plans is not as visible as in the south region of Portugal, the property average size is considerably small, what reduces the risk for this indicator. Taking a precautionary approach, specified risk is defined.
Means of Verification	Internet research GIS maps of HCV areas Regional, publicly available data from a credible third party as FSC and PEFC reports Forest Management plan as PGF, PUB, PEIF Game management plans Regional Forest Plans Forest Best Management Practices Forest Operating Procedures Records of BPs’ field inspections Monitoring records Publicly available information on the protection of the values identified Historical maps and enquiries with stakeholders Aerial photos Approved EIA when applicable. Records of oil and hazardous chemicals deliveries. Assessment at an operational level of

	measures designed to minimise impacts on the values identified Erosion and desertification programs and maps Approved RJAAR
Evidence Reviewed	http://www.icnf.pt/portal/icnf/serv/biblioteca/resource/ficheiros/boas-praticasflorestais/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 Water Law: Dec-Law n.º 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#pgbhtabela Reserva Ecológica Nacional Law: https://dre.pt/application/dir/pdf1sdip/2012/11/21200/0630806346.pdf https://www.uc.pt/fluc/nicif/riscos/Documentacao/Territorium/T04_artg/T04_A rtg10.pdf https://www.repository.utl.pt/bitstream/10400.5/1307/1/REP-Fabiao%2C%20A.-Madeira_et_al_2007.pdf Strategic Guidance for Intervention on water courses, (Hydrographic Administration of the Centre Region) https://www.apambiente.pt/_zdata/Divulgacao/Projectos/agua/EstudoEstrategico/GuiaIntervencaoLinhasAguaARHC.pdf Forestry Best Practices Handbook for Castelo de Bode Dam, Guiomar, N, Fernandes, J.P.A., http://www.epal.pt/EPAL/docs/defaultsource/epal/biodiversidade/publica%C3%A7%C3%B5es/manual-de-boaspr% C3%A1ticas-de-gest%C3%A3o-dos-espa%C3%A7os-florestais.pdf?sfvrsn=10 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.cmcantanhede.pt/mcsite/Media/upload/2011/20111017165413_Regulamento_Mu nicipal_Floresta.pdf Alvaiázere: http://ftp.cm-alvaiazere.pt/regulamentos/Regulamento_florestal.pdf Ferreira do Zêzere: www.cmferreiradozezere. pt/component/attachments/download/1617
Risk Rating	Specified Risk
Comment or Mitigation Measure	Before site visit the information is search and identified; Fill the audit form; Fill the audit suppliers table vs risk results; If necessary mitigation with training or notify the suppliers and /or logging workers; If necessary delivery an informative manual to suppliers with the good practices.

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

	pollution. According to the National Inventory Report on Greenhouse Gases 1995-2015 developed by Portuguese Environment Agency (APA), Portuguese forest acted as a carbon sink in the period of the study with a net carbon sequester of 753,2 Gigagrams. Only forestry and agriculture showed this trend during the period of the study. Based on available information the requirements included in this indicator are considered low risk.
Means of Verification	Forest Best Management Practices Supply contracts Records of BPs' field inspections Assessment at an 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
Evidence Reviewed	• Environmental Laws : Law n.º 19/14 de 14/04 artº10ºd) DL nº49/05, de 24/02 artº20º • DL 197/2005, de 8/11 artº 1º, nº3 b) e nº4, Decree-Law n.º 102/2010 of 23/09 https://dre.pt/application/dir/pdf1sdip/2010/09/18600/0417704205.pdf Machinery • NP 1948, de 1994 • NP 2761, de 1988 • NP EN 13525:2005+A2:2009
Risk Rating	Low Risk
Comment or Mitigation Measure	

	Indicator
2.2.8	The BP has implemented appropriate control systems and procedures for verifying that there is controlled and appropriate use of chemicals, and that Integrated pest management (IPM) is implemented wherever possible in forest management activities (CPET S5c).
Finding	The national legal framework for agrochemicals use is the Law nº 26/2013 from April 11th which applies to Portuguese context the EU Directive n.º 2009/128/CE, of 21/10 and it states: - Only distributing companies and sales outlets authorized by the Directorate-General for Food and Veterinary (DGAV) may carry out the activity of distribution or sale of fitopharmaceuticals; - Establishes the qualification requirements for the responsible technician for the trade of the chemical products; - Defines the minimum training required for the user and applicator of the fitopharmaceuticals; - Defines the good practices to reduce the negative impacts of the use of fitophamaceuticals. The implementation of this law had a very positive impact on use of agrochemicals, and included the needing of accredited and records (quantities, disposals, etc.) to all the involved operators. The use of chemicals on Portuguese forests is not common and it is very restricted to a few cases because, among others, there are few homologate products applied to the most important phitosanitary forest plagues and diseases. Based on available information the requirements included in this indicator are considered low risk.
Means of Verification	Existing legislation; Level of enforcement; Assessment at an operational level of measures designed to minimize impacts on the values identified; Monitoring records; Interviews with staff. Records of chemicals deliveries;

Evidence Reviewed	Law n.º 26/2013 de 11 /04: https://dre.pt/application/file/260367 Pine processionary official Plan: http://www.icnf.pt/portal/florestas/prag-doe/resource/doc/proc/proc-florest-2015.pdf Eucalyptus snout beetle official plan: http://www.icnf.pt/portal/florestas/prag-doe/ag-bn/gorg-eucal
Risk Rating	Low Risk
Comment or Mitigation Measure	

	Indicator
2.2.9	The BP has implemented appropriate control systems and procedures for verifying that methods of waste disposal minimise negative impacts on forest ecosystems (CPET S5d).
Finding	The legal framework for waste disposal is based on a recent law which applies, to Portuguese legal framework, EU Directive n. º 2008/98/CE. 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. Waste disposal on forest lands exist in Portugal and it affects both private and public lands. But as it is illegal in the country there are efforts made by private owners and authorities to collect the waste and send it to final legal destination. Some of the measures used by owners include fencing of their lands, sign installation against waste disposal and filling complaints to authorities in case of illegal waste disposal. Based on available information the requirements included in this indicator are considered low risk.
Means of Verification	Existing legislation; Level of enforcement; Regional Best Management Practices
Evidence Reviewed	Waste Management and Planning Official page: https://www.apambiente.pt/index.php?ref=16&subref=84 Decree-Law n.º 73/2011 de 17/06: https://www.apambiente.pt/_zdata/Politicas/Residuos/DL_73_2011_DQR.pdf Waste National Management Plan: file:///C:/Users/imobi_000/Downloads/Projeto_PNGR_2011-2020.pdf European Waste Statistical: http://ec.europa.eu/eurostat/statistics-explained/index.php/Waste_statistics/pt
Risk Rating	Low Risk
Comment or Mitigation Measure	

	Indicator
2.3.1	Analysis shows that feedstock harvesting does not exceed the long-term production capacity of the forest, avoids significant negative impacts on forest productivity and ensures long-term economic viability. Harvest levels are justified by inventory and growth data.
Finding	Statistical information on National Forest Inventory is fully available from IFN5 (2005) and preliminary results from IFN6 (2010). Preliminary results from IFN6 (2010) for main species in pellet production show that: Total forest area in Mainland Portugal is 3,154,800 has of which 2,972,356 has correspond to forested area. Eucalyptus is specie with larger area of settlements. Forest cover with Eucalyptus has increase 13% from 1995 to 2010 (over 90,000 has in the period to a total surface of 812,000 has in 2010; 755,355 has on forested areas) mostly on areas converted from Pinus pinaster (70,000 has in the period). Pinus Wilt Disease/Nemátodo-do-pinheiro pest, fires and economic motivations can be behind it. Pinus pinaster forests have decrease significantly from 1995 to 2010: 27% on total surface (263,000 has in the period to a total surface of 713,000 has in 2010; 624,248 ha on forested areas). 163,000 has was converted to open land, mostly related to Pinus Wilt Disease/Nemátodo-do-pinheiro pest and fires and 70,000 has to Eucalyptus plantations, which can also include economic motivations. Represents the majority of inputs in BP feedstock. Pinus pinea forests have increase significantly form 1995 and 2010: 54% (over 55,000 has in the period to a total surface of 175,000 has in 2010; 173,716 has on forested areas). This specie is planted primarily for harvest of pine nuts and protective land use. Have impact on feedstock in southern pellet plants. It is not subject to harvest for round wood production so feedstock comes as a result of silvicultural works. This specie has good biomass percentage in relation to its volume as a result of branches. Analysing statistical information available for average annual growth (AMA) from IFN5 (2005) show for Mainland Portugal: On Eucalyptus an average annual growth of 4,375,000 m3/year based on 2005 inventory data. Currently the value will be significantly higher. Eucalyptus wood from Portugal consumption in 2014 was 5,400,000 m3 (CELPA data). Eucalyptus is fast growing specie, over 12 years, with one and only cut on the period: final clear cut. So harvesting does not compromise long-term production of the forest. On Pinus pinaster an average annual growth of 3,650,000 m3/year based on 2005 inventory data. Currently the value will be lower. Pinus pinaster wood from Portugal harvested in 2014 was 2,247,000 m3 (Centro Pinus data). So Pinus pinaster wood available from Portugal in under AMA. On the analysis it is relevant also to take into account that: 1. Pinus Wilt Disease/Nemátodo-da-madeira-do-pinheiro pest have affected significantly to Pinus pinaster. 2. Fires continue to be a relevant problem in Portugal. 3. Data from CentroPinus states that pine wood consumption of timber industry in 2014 was 4,360,000 m3, with a relevant data a 1,400,000 m3 for pellets, 32% of total. Also 32% of pine wood used by CentroPinus partners was imported in 2014. Percentage of imported pine wood used in 2006 was 3%. So lack of pine wood from Portugal is being covered with importations, mainly from Spain.~ 4. Data from CELPA states that Eucalyptus consumption of pulp and paper industry in 2014 was 7,800,000 m3 (4,980,000 m3 in 2005), of which 2,415,000 m3 were imported, mainly from Spain. So all above information shows that actual harvesting volume does not exceed sustainable values and compromises long-term economic viability of stands. Thus the risk for this indicator has been assessed as Low.
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	Estrategia Nacional das Florestas (RCM n.º 6-B/2015 - Diário da República n.º 24/2015, 1º Suplemento, Série I de 2015-02-04); ICNF portal (http://www.icnf.pt/portal/icnf/docref/enf) Estatísticas Agrícolas 2015.xls, Instituto Nacional Estatística (https://www.ine.pt/xportal/xmain?xpid=INE&xpgid=ine_publicacoes&PUBLICACOESpub_boui=271434407&PUBLICACOESmodo=2) Inventario Florestal Nacional IFN5 (FloreStat_IFN5); ICNF portal (http://www.icnf.pt/portal/florestas/ifn/ifn5/rel-fin) Inventario Florestal Nacional IFN6, preliminary results (IFN6 - Resultados preliminares.pdf); ICNF portal (http://www.icnf.pt/portal/florestas/ifn/ifn6) Boletim-Estatístico-da-Celpa-de-2014 (http://www.celpa.pt/wpcontent/uploads/2016/09/Boletim_WEB_2015.pdf) Relatório-de-Caracterizacão-da-FiLawra-Florestal-2014 (http://www.aiff.org.pt/assets/Relatorio-de-Caracterizacao-da-FiLawra-Florestal- 2014-160p-CAPA-3-spread....pdf) FiLawra do Pinho: desafios e oportunidades (centroPINUS_JoaoGonçalves dados fiLawra pinho 2014.pdf); Centro Pinus (http://www.centropinus.org/index.php?lingua=1) Decreto Law 16-2009 planos gestão florestal (https://dre.pt/application/dir/pdf1sdip/2009/01/00900/0026800273.pdf); ICNF portal (http://www.icnf.pt/portal/icnf/legisl/legislacao/2009/Decree-law-n.o-16- 2009-de-14-de-janeiro.-d.r.-n.o-9-serie-i) Normas Tecnicas Planos Gestão Florestal, ICNF portal (http://www.icnf.pt/portal/florestas/gf/pgf/resource/doc/manual/normastecnPGF- AFN.pdf)
Risk Rating	Low Risk
Comment or Mitigation Measure	

	Indicator
2.3.2	Adequate training is provided for all personnel, including employees and contractors (CPET S6d).
Finding	National Strategy for Forests states that focus on the professionalization and training of the different actors in the forestry sector shows key importance for increasing the competitiveness and, thereby, the development of the sector. ICNF develops training actions aimed for forest operators, foresters, inspectors, forest managers through COTF (Forestry Techniques Operational Centre). This Centre is under direct management of ICNF and has, as its main objective to provide training and professional skills enhancement to operators with special emphasis on forest operations, use and maintenance of machinery and equipment, technologies and techniques applied. Training courses always comprise the attention to safety, hygiene and health at the work place. COTF is operative since 1984 and provides yearly training courses for forest companies, ICNF staff, inspectors, as well as information and promotion activities in schools and other public events. 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. Portugal has a long tradition of forests activities. Universities network supply high education courses in the field of forestry engineering, agronomy, environment engineering, among others. There are, as well, specific courses for field machinery operators. Several professional schools, agro forestry training centres and public institutes have several training courses directed to

	forestry operators has demonstrated below: http://www.eppovoacao.pt/index.php?page=277 http://forestis.pt/pagina,8,8.aspx http://www.drapn.min-agricultura.pt/BDFPA/documentos/Florestas.pdf http://moodle.epafbl.edu.pt/course/view.php?id=339 http://academiacomenius.com/course/operador-de-maquinas-multifuncoes-processadorae- feller/ The risk for this indicator is assessed as specified.
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	Estrategia Nacional das Florestas (RCM n.º 6-B/2015 - Diário da República n.º 24/2015, 1º Suplemento, Série I de 2015-02-04); ICNF portal (http://www.icnf.pt/portal/icnf/docref/enf) Centro de Operações e Técnicas Florestais (COTF) - Segurança e Saúde, ICNF portal (http://www.icnf.pt/portal/florestas/gf/cotf); (http://www.icnf.pt/portal/florestas/gf/cotf/o-q-e); (http://www.icnf.pt/portal/florestas/gf/cotf/formacao) Catalogo Nacional de Formações (http://www.catalogo.anqep.gov.pt/PDF/QualificacaoReferencialPDF/1065/CA/duplacertificacao/623314_RefCA) http://www.catalogo.anqep.gov.pt/boDocumentos/getDocumentos/522
Risk Rating	Specified Risk
Comment or Mitigation Measure	Fill the health and safety audit form; Fill the audit suppliers table vs risk results; If necessary mitigation with training or notify the suppliers and logging workers; If necessary delivery an informative manual to suppliers with the good forest practices.

	Indicator
2.3.3	Analysis shows that feedstock harvesting and biomass production positively contribute to the local economy, including employment.
Finding	Statistic for forest sector in total, shown that value added of forest production in Portugal is 1,193million euro (M€) in 2014, with a sustained growth over last years. Also 2014 forestry goods production have an estimation of 878.25 M€ of which wood for energy is 55.38 M€ (6%). Data from INE 2012 states that 91% of Portuguese forest sector enterprises have from 1 to 10 workers. Forest industries employ 78,000 people (12% of all Portuguese processing industry, 1.7% of Portuguese employed population) of which 10,600 work on logging companies and 20,800 on wood industry. Also annual turnover of forest sector industries was in 2012 over 7,392M€ (2,497.6M€ wood and furniture industry, 1,320.4 M€ cork industry and 3,574.6 M€ pulp and paper industry), representing 10% of all Portuguese processing industry. Despite the recent crisis, the forest sector has maintained its contribution, in macroeconomic terms, in terms of added value. Biomass/Feedstock with origin in Portuguese forest is supplied through domestic supply chains to BP's so economic impact related to feedstock chain from the forest, transportation, processing and BP is local. Also it is mainly complementary with other wood industries as use on their processes low quality wood (which previously it was not exploited or it was burned) or wastes from industrial processes. With all of these

	considerations we can conclude that biomass production contributes positively to local economy and thus the indicator has been assessed as low.
Means of Verification	Data analysis
Evidence Reviewed	Estrategia Nacional das Florestas (RCM n.º 6-B/2015 - Diário da República n.º 24/2015, 1º Suplemento, Série I de 2015-02-04); ICNF portal (http://www.icnf.pt/portal/icnf/docref/enf) Estatísticas Agrícolas 2015.xls, Instituto Nacional Estatística (https://www.ine.pt/xportal/xmain?xpid=INE&xpgid=ine_publicacoes&PUBLICACOESpub_boui=271434407&PUBLICACOESmodo=2) Relatório-de-Caracterizacão-da-FiLawra-Florestal-2014 (http://www.aiff.org.pt/assets/Relatorio-de-Caracterizacao-da-FiLawra-Florestal- 2014-160p-CAPA-3-spread....pdf) FiLawra do Pinho: desafios e oportunidades (centroPINUS_JoaoGonçalves dados fiLawra pinho 2014.pdf); Centro Pinus (http://www.centropinus.org/index.php?lingua=1)
Risk Rating	Low Risk
Comment or Mitigation Measure	

	Indicator
2.4.1	The BP has implemented appropriate control systems and procedures for verifying that the health, vitality and other services provided by forest ecosystems are maintained or improved (CPET S7a).
Finding	The Operational Program of Forest Health [1] defines a complete action framework comprising implementation assessment reports [2] (diagnosis, identification, monitoring, control, sampling, etc.), informative leaflets (FitoNotícias) [3], Best practices handbook aimed to several steps of forest based operations and a wide diversity of documents and actions aiming to inform and train forest owners and operators on legislation, best practices, precautionary measures among others [4]. 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 (Bursaphelenchus xylophilus) [5] and Eucalyptus (gonipterus scutellatus) [6]. Statistics from IFN5 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% These values lead to the development and application of several sanitary actions plans from which the assessment reports data are presented below. From 2008 to April 2013, 22656 plots were monitored and 16545 composite samples were collected (maximum of 5 trees per sample), of which 934 were positive for the presence of NMP. (5,6% of the samples) [Implementation of programs for prospecting, monitoring and control of quarantine organisms – 2013]. From the Report on the Execution of the National Plan for the Control of the Nematode 2014 – During 2014, 12,180 plots were monitored and 9,376 composite samples collected of which 861 were positive for the presence of NMP (9,2% of the samples). All the positive samples

	detected during the 2014 campaign are located in previously established Intervention Sites (LI) or in their surroundings, essentially in the Central region, Lisbon and Tagus Valley and Alentejo region. This shows that the disease is geographically contained, despite the higher number of positive samples. In the buffer zone (20km from the border with Spain), an area subject to intense monitoring and sampling of the decline trees, 6,261 samples were collected and 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, Monochamus galloprovincialis, captured, the presence of NMP was detected in about 30% of the individuals, mainly in Intervention Sites and their surroundings, located in the District of Coimbra and Leiria, in areas distant from the buffer zone.” 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 infractions (1,7%) from which 295 refer to the lack of NMP manifest (1,2%) [Activity Report 2016]. A contract [8] between ICNF and a service provider, referring to the execution of specific analysis to monitor the presence of NMP on coniferous samples shows the effective application of control and monitoring measures. 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 ICNF webpage - http://www.icnf.pt/portal/florestas/prag-doe/leg. The most relevant pests and diseases are addressed, namely, the ones affecting wood industry more directly– Bursaphelenchus xylophilus and gonipterus scutellatus. Simultaneously, there is an extensive list of communication actions and informative documentation available on ICNF Forest Health page (http://www.icnf.pt/portal/florestas/prag-doe/divulg), showing that efforts were made and are being made in order to promote best practices regarding the improvement of forest health. 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. The scope of this assessment is the impact/effect of forest operations on the indicators assessed, as is written in the spb standard 1: “Overall evaluation of potential impacts of operations on forest ecosystem health and vitality”. Forest operations have a positive impact on the control of forest diseases as is the case of NMP, since one of the control measures is to cut down the plants showing signs of decline. 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.
Means of Verification	Overall evaluation of potential impacts of operations on forest ecosystem health and vitality Assessment of potential impacts at operational level and of measures to minimise impacts Regional Best Management Practices Supply contracts Monitoring results. Experts consultation
Evidence Reviewed	[1] Operational Program of Forest Health, (2014), http://www.icnf.pt/portal/florestas/pragdoe/ posf [2] Implementation assessment report, 2015, http://www.icnf.pt/portal/florestas/pragdoe/ resource/doc/posf/POSF-Relatorio-execucao-2015-30NOV2016-Aprovado.pdf [3] http://www.icnf.pt/portal/florestas/prag-doe/resource/doc/divul/fitonoticias/Fitonoticia- 11-06fev2017.pdf [4] http://www.icnf.pt/portal/agir/boapratic/prag-doenc [5] http://www.icnf.pt/portal/florestas/prag-doe/plan-rel/resourc/doc/rel/nematodo- Relatorio-

	Anual-Atividade-2014.pdf [6] http://www.icnf.pt/portal/florestas/prag-doe/plan-rel/resourc/doc/rel/gorgulho- Relatorio-anual-atividades_2014 [7] http://www.dgsi.pt/jtrc.nsf/c3fb530030ea1c61802568d9005cd5bb/67e0cabe6a3c046580257f1400434c6d?OpenDocument □ http://www.asae.pt/wwwbase/wwwinclude/ficheiro.aspx?access=1&id=13073 □ https://blook.pt/caselaw/PT/TRE/513612/ [8] https://www.parlamento.pt/Documents/XIILEG/Abril_2015/relatorioseginterna2014.pd f [9] http://www.base.gov.pt/base2/rest/documentos/17222 [10] http://fogos.icnf.pt/manifesto/TipoLinksEntradalist.asp
Risk Rating	Low Risk
Comment or Mitigation Measure	

	Indicator
2.4.2	The BP has implemented appropriate control systems and procedures for verifying that natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b).
Finding	Adding to the findings of indicator 2.4.1 and considering pests and diseases are properly managed. 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 25% of the overall burned area in the period 2001/2010. Forest area suffering from fires in the same period, also decreased with the implementation of this strategic plan, accounting for 15% of the 10 year figures. The former National Forest Strategy subject to this assessment set a maximum threshold of 100 000 ha of burned area per year till 2012, which was accomplished, on average, with 72,669 ha/year from 2006 till 2010. This shows that the forest fire hazard was identified and with the management plan put in place, several performance indicators were met, hence impacts were minimized. Instruments to support the implementation of actions to recover the effects of large forest fires are applied every year in order to manage the risks created by the occurrence of forest fires. [2] 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] In march, 2016, was launched the Action Plan for the Reduction of Fire Occurrences [5], embedded in the National Forest Strategy of 2015. The Protection of forest against forest fires is implemented and applied by every municipality and CCDR has can be seen by searching for Regional and Municipal plans approved and in force. Examples of law enforcement: http://www.gnr.pt/comunicado.aspx?linha=2097 Forest protection against fires – 2016 from GNR [6] Cooperation between ICNF and the Army [7] Surveillance Actions [8] 2012 activities report [9] 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, the risk is considered low for management of pests and diseases. Regarding forest fires, the lack of

	updated reports on the application of national plans against forest fires and the continuous incidence of occurrences raises the risk evaluation on this parameter to specified.
Means of Verification	Regional Best Management Practices Supply contracts Assessment of potential impacts at operational level and of measures to minimise impacts Monitoring results Regional, publicly available data from a credible third party The existence of a strong legal framework in the region Expert consultation Felling Sanitary Manifest [NMP Manifest]
Evidence Reviewed	[1] Assessment report of the National Forests Strategy (2012), http://www.icnf.pt/portal/icnf/docref/resource/doc/docref/enf-aval [2] http://www.icnf.pt/portal/florestas/dfci/relat/raa/ree-2016 [3] http://www.icnf.pt/portal/florestas/dfci/sf1/psf [4] http://www.icnf.pt/portal/florestas/dfci/sf1/psf/rel-doc [5] http://www.icnf.pt/portal/florestas/dfci/Resource/doc/PlanoNacionalReducaoNumeroOcorrencias_V1.pdf [6] http://www.prociv.pt/bk/PublishingImages/Lists/Noticias/AllItems/GNR_RESULTADOS%20FINAIS%20DFCI%202016.pdf [7] http://www.icnf.pt/portal/florestas/dfci/Resource/doc/planos-faunos/Relatorio-PLANOFAUNOS- 2016.pdf [8] http://www.gnr.pt/noticias.aspx?linha=6764 [9] http://www.icnf.pt/portal/florestas/dfci/Resource/doc/sndfci/apresentacao-sndfci
Risk Rating	Specified Risk
Comment or Mitigation Measure	Before site visit the information is search and identified; Fill the audit form; Fill the audit suppliers table vs risk results; If necessary mitigation with training or notify the suppliers and /or logging workers; If necessary delivery an informative manual to suppliers with the good practices.

	Indicator
2.4.3	The BP has implemented appropriate control systems and procedures for verifying that there is adequate protection of the forest from unauthorised activities, such as illegal logging, mining and encroachment (CPET S7c).
Finding	Unauthorized activities such as illegal logging, mining and encroachment are not a significant problem in Portugal. There are low scale problems as illegal littering, loose dogs, unauthorized sports, theft of firewood, wood or fruits, poaching. Illegal or unauthorized activities in Portuguese forests generally have limited economic or biological impact.
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.illegallogging. info/regions/portugal) Transparency international, corruption perception index Portugal (https://www.transparency.org/country/#PRT)

Risk Rating	Low Risk
Comment or Mitigation Measure	

	Indicator
2.5.1	The BP has implemented appropriate control systems and procedures for verifying that legal, customary and traditional tenure and use rights of indigenous people and local communities related to the forest, are identified, documented and respected (CPET S9).
Finding	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”. Nevertheless, for a habitual action to be admitted as a rule and, for this reason, be considered a Customary Right, it is indispensable that it is supported by generalized and prolonged use (tradition), assuming the presumption that the general consensus (opinion necessitates) approved such action. 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. Thereby, the following requirements must be observed for a habitual action to be considered within Customary Right: It consists in repeated facts, evenly performed for a long period of time; Generalized and public practice; and Consist on licit facts and not contradictory to the law or public order. Cases are, where the custom is considered within the law framework, designated by secundum legem. When the custom completes the law framework, filling in a law deficiency or interpreting it, it is designated as praeter legem. 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. The customary right is described in the article 348th of the Portuguese civil code. The interpretation of laws is described in the article 9th of the Portuguese civil code. In the case of community areas, specific legislation regulates rights of use of common forest areas. (Lei dos Baldios) There are no indigenous people or minorities that need special protection in the country, neither local communities whose depend on forest services for their subsistence and for this reason, low risk is found for this indicator.
Means of Verification	Customary use rights are identified and documented Interviews with local communities and other stakeholders, indicate that their rights are being respected Appropriate mechanisms exist to resolve disputes Agreements exist regarding these rights
Evidence Reviewed	Faro Convention, Republic Assembly Resolution nº 47/2008 Constitutional Law nº 1/89 from July 8th Law nº 54/2005 from November 15th Law nº 58/2005 December 29th Law nº 107/2001 September 8th Law nº 173/99 September 21st Law nº 7/2008 February 15th Law nº 2069 April 24th 1954 Decree-law 47344/66 November 25th Decree-law 400/82 September 23rd

Risk Rating	Low Risk
Comment or Mitigation Measure	

	Indicator
2.5.2	The BP has implemented appropriate control systems and procedures for verifying that production of feedstock does not endanger food, water supply or subsistence means of communities, where the use of this specific feedstock or water is essential for the fulfillment of basic needs.
Finding	Subsistence needs for local communities are assessed as being not applicable for Portugal. Based on the above, it is concluded that there is a low risk of non-compliance with the requirement.
Means of Verification	
Evidence Reviewed	
Risk Rating	Low Risk
Comment or Mitigation Measure	

	Indicator
2.6.1	The BP has implemented appropriate control systems and procedures for verifying that appropriate mechanisms are in place for resolving grievances and disputes, including those relating to tenure and use rights, to forest management practices and to work conditions.
Finding	This indicator serves the purpose to evaluate the efficiency of the legal system implemented the region under assessment, to deal and resolve grievances and disputes related to tenure and use rights, forest management practices and work conditions. Legal framework includes the Portuguese Constitution, the Labour Code and other specific regulations. The detailed procedures, duties and responsibilities of involved persons are defined in both legislation and other legal regulations. Legislation and justice system provides a route for appeal should people or companies be dissatisfied with the outcome

	of the dispute resolution process. Land tenure and use rights are object of Civil Code, being land tenure included on private property rights on Constitution article 62th. These rights include communitarian forests and also Forest Renting/leasing contracts. Disputes about forest management practices would involve forest authorities ICNF on both public and private forests. Specific forest management practices should be included on renting and forest services contracts as harvesting contracts. 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. Portugal as a score of 80 in 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] 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 indicator 2.6.1.
Means of Verification	Existing legal systems Level of enforcement Forest Best Management Practices Renting and harvesting contracts
Evidence Reviewed	Labour Code: Law n.º 7/09 12/02 (http://www.act.gov.pt/(pt-PT)/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx Portuguese Constitution Civil Code: http://www.pgdlisboa.pt/Laws/Law_mostra_articulado.php?nid=775&tabela=Laws World Bank Governance: http://info.worldbank.org/governance/wgi/index.aspx#reports
Risk Rating	Low Risk
Comment or Mitigation Measure	

	Indicator
2.7.1	The BP has implemented appropriate control systems and procedures for verifying that Freedom of Association and the effective recognition of the right to collective bargaining are respected.
Finding	Portugal has signed the ILO fundamental conventions, which includes the C87 Freedom of Association and Protection of the Right to Organize Convention (1948) on 1977th and C98 Right to Organize and Collective Bargaining Convention (1949) on 1964. This right is included on Portuguese constitution on article 56. Most part of working activities is covered by an annual working collective convention, which includes the forest sector. 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." Authority directly involved on employment rights and conditions is

	Work Conditions Authority (ACT) but for many reasons other authorities are related to the issue, as Immigration and Borders Services (SEF) social security services or even tax services. All of them can make inspections to different issues related to work, with the joining of policies authorities as GNR – Republican National Guard and PSP-Public Security Police. ACT has strategic Plans for Agriculture and Forest activities and also does integrated inspections with Spanish authorities for agriculture and forestry activities. Recently one notice state that ACT bought a drone to help agriculture and forestry inspections. Inspective activities of ACT and SEF result on penalties or suspensions when illegal situations are found. It wasn't found law violations identified on the right of freedom of association and collective bargaining in Portuguese forest sector. According to the available information this indicator is classified as low risk.
Means of Verification	Legislation Level of enforcement Portuguese constitution Regional, publicly available data from a credible third party Publicly available information (News and media)
Evidence Reviewed	Agriculture, Food and Forest Union: http://www.setaa.pt/index.php/Geral/ Boletim do Trabalho e Emprego: http://bte.gep.msess.gov.pt/ http://bte.gep.msess.gov.pt/completos/2016/bte4_2016.pdf WWW.ILO: http://www.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO::P13100_COMMENT_ID,P13100_LANG_CODE:3253858,en:NO Overview of ILO convention ratifications by Portugal: http://www.ilo.org/public/portugue/region/eurpro/lisbon/html/portugal_convencoes_numero_pt.htm ITUC Global RIGhTs Index The woRld's woRsT CoUnTRIes foR workers: http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf Labor Code• Law n. º 7/09 12/02 and updates like L69/13, de 30/08 includes collective convention http://www.act.gov.pt/(pt-PT)/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx Portuguese Constitution 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/aspx/noticias/Noticias_Detalhe.aspx?id_linha= 7018 http://www.sef.pt/portal/v10/PT/aspx/noticias/Noticias_Detalhe.aspx?id_linha= 6802 ACT Annual Reports: http://www.act.gov.pt/(ptPT)/SobreACT/DocumentosOrientadores/RelatorioActividades/Paginas/default.aspx 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 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
Risk Rating	Low Risk
Comment or Mitigation Measure	

	Indicator

2.7.2	The BP has implemented appropriate control systems and procedures for verifying that feedstock is not supplied using any form of compulsory labour.
Finding	Portugal has ratified the convention against forced labour (nº29) in 1956. Portuguese legislation is applied against any form of compulsory labour in accordance with Article 160 of the Criminal Code, one who offers, gives, servicemen, calls accepts, transports, harbours or receives a person for the purpose of exploitation, including sexual exploitation, labour exploitation, begging, slavery, harvest organs or other exploitation by criminal activities and he / she has abused the authority resulting from a hierarchical relationship of dependency (whether financial, family or work related) is punished with imprisonment of three to ten years. Source: § (Article 160 of Decree-Law No. 400/82 Penal Code amended by Law No. 59/2007 and Law No. 60/2013). 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." ACT has strategic Plans for Agriculture and Forest activities and also does integrated inspections with Spanish authorities for agriculture and forestry activities. Recently one notice state that ACT bought a drone to help agriculture and forestry inspections. Inspective activities of ACT and SEF result on penalties or suspensions when illegal situations are found. Nevertheless, in forestry there wasn't found any evidence confirming the existence of risks of compulsory and/or forced labour in Portugal. According to the available information this indicator is classified as low risk.
Means of Verification	Legislation Level of enforcement Regional, publicly available data from a credible third party Publicly available information (News and media)
Evidence Reviewed	III National Plan to Prevent and Combat Trafficking in Human Beings 2014-2017 athttp://www.igualdade.gov.pt/images/stories/documentos/legislacao/legislacao/Planos_Nacionais/2014-2017-iii-pnpc-tsh-en.pdf Observatory on Traffic in Human Beings: http://www.otsh.mai.gov.pt/Recursos/Pages/default.aspx Reports of Observatory on Traffic in Human Beings: 2015; 2014; 2013; 2012; 2011 Overview of ILO convention ratifications by Portugal: http://www.ilo.org/public/portugue/region/eurpro/lisbon/html/portugal_convencoes_numero_pt.htm ITUC Global RIGhTs Index The woRld's woRsT CoUnTRIes foR workers: http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf 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/aspx/noticias/Noticias_Detalhe.aspx?id_linha= 7018 http://www.sef.pt/portal/v10/PT/aspx/noticias/Noticias_Detalhe.aspx?id_linha= 6802 ACT Annual Reports: http://www.act.gov.pt/(ptPT)/SobreACT/DocumentosOrientadores/RelatorioActividades/Paginas/default.aspx 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 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%20floresta l.pdf

Risk Rating	Low Risk
Comment or Mitigation Measure	

	Indicator
2.7.3	The BP has implemented appropriate control systems and procedures to verify that feedstock is not supplied using child labour.
Finding	In Portugal the minimum age for employment is 16 years. A minor of 16-year-old can't be used to carry out a paid activity delivered with autonomy unless he / she has completed compulsory education or is enrolled and attending secondary education, and is a work light. This light work should consist of simple tasks and is not likely to adversely affect the physical integrity, safety and health, school attendance, or their, moral, psychological, intellectual and cultural physical well-being. (Art.le 66-83 of the Labour Code) 2009. Portugal has ratified Minimum Age Convention (1973) C138 in 1989th and the convention C182 Worst Forms of Child Labour Convention (1999) on 2000th. 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." UNICEF report 2012 "Measuring Child Poverty was rating 14,7% of Portuguese children below 16 years age as below "poverty line". Robust data about child labour are not recent, as the last official inquiry report is from 2001, and the results were not positive as 4,1% of children of the study were affected by child labour (CNASTI), with half of this proportion related to agriculture. 2015: FSC Portugal CNRA report states "Despite evidence of some (remaining) cases of child labour, there is evidence that this problem is not structural nor of large size. No evidence found of cases of child labour in the forest sector. The national CWRA explicitly mentions "child labour in the forest sector in Portugal is very low". There is evidence that the number of minors working illegally is rather insignificant. Authority directly involved on employment rights and conditions is Work Conditions Authority (ACT) but for many reasons other authorities are related to the issue, as Immigration and Borders Services (SEF) social security services or even tax services. All of them can make inspections to different issues related to work, with the joining of policies authorities as GNR – Republican National Guard and PSP-Public Security Police. ACT has strategic Plans for Agriculture and Forest activities and also does integrated inspections with Spanish authorities for agriculture and forestry activities. Recently one notice state that ACT bought a drone to help agriculture and forestry inspections. Inspective activities of ACT and SEF result on penalties or suspensions when illegal situations are found. Nevertheless, based on the available information it wasn't found any evidence confirming the existence of risks of child labour in forestry in Portugal.
Means of Verification	Legislation Level of enforcement Regional, publicly available data from a credible third party Publicly available information (News and media)

Evidence Reviewed	Legislation: Labour Code•:Law n.º 7/09 from 12/02 http://www.act.gov.pt/(pt-PT)/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx Law n.º 47/2012, de 29/08 at http://www.cnasti.pt/cnasti/documentos/1403451265.pdf Decree Republic President 28/2000 1/06 at http://www.ilo.org/public/portugue/region/eurpro/lisbon/pdf/conv_182.pdf Republic Assembly Resolution 11/98 at http://www.ilo.org/public/portugue/region/eurpro/lisbon/pdf/conv_138.pdf 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/aspx/noticias/Noticias_Detalhe.aspx?id_linha=7018 http://www.sef.pt/portal/v10/PT/aspx/noticias/Noticias_Detalhe.aspx?id_linha=6802 ACT Annual Reports: http://www.act.gov.pt/(ptPT)/SobreACT/DocumentosOrientadores/RelatorioActividades/Paginas/ default.aspx News about ACT inspective work including forest: http://www.act.gov.pt/(ptPT)/Itens/Noticias/Paginas/ACTeInspe%C3%A7%C3%A3odoTrabalhod eEspanhaema%C3%A7%C3%B5esconjuntas.aspx ACT Strategic Plan for Agriculture and Forestry Activities: http://www.act.gov.pt/(ptPT)/Campanhas/Campanhasrealizadas/Trabalho_Agricola_Florestal/Do cuments/Relat%C3%B3rio%20-%20Plano%20a%C3%A7%C3%A3o%20setor%20agr%C3%ADcola%20e%20florestal.pdf Other Sources: Overview of ILO convention ratifications by Portugal: http://www.ilo.org/public/portugue/region/eurpro/lisbon/html/portugal_convencoes_numero_pt.ht m Social characterization of aggregates Portuguese Family with Children in School Age http://www.cnasti.pt/cnasti/documentos/1403450788.pdf UNICEF Innocenti Research Centre (2012), 'Measuring Child Poverty: New league tables of child poverty in the world's rich countries', Innocenti Report Card 10, UNICEF Innocenti Research Centre, Florence at ITUC Global RIGhTs Index The woRld's woRsT CoUnTRIes foR workers: http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf
Risk Rating	Low Risk
Comment or Mitigation Measure	

	Indicator
2.7.4	The BP has implemented appropriate control systems and procedures for verifying that feedstock is not supplied using labour which is discriminated against in respect of employment and occupation.
Finding	Protection against discrimination in labour is included in Portuguese constitution (Article 55th), and labour code. Portugal has ratified ILO convention about discrimination on work and career C111 (1958) on year 1959th. Also convention about equal remuneration C100 was ratified on year 1966th. Portugal is well positioned at majority of international reports: Corruption Perception Index scores 63 meaning low perceived level of corruption; Worldwide Governance Indicators (WGI) from 73.3 to 84.13 (1-100points) The WGI report six aggregate governance indicators for over 200 countries and territories over the period 1996-2014, covering i) Voice and Accountability, ii) Political Stability and Absence

	of Violence/Terrorism, iii) Government Effectiveness, iv) Regulatory Quality, v) Rule of Law, and vi) Control of Corruption. Free country on press, net, political rights and civil liberties. On the other side Portugal (including human rights, illegal logging, forest and timber) is not listed in alarming reports or indexes such as: Committee to Protect Journalists Impunity Index; Human Rights Watch; Global Witness Chatham House Amnesty International Some observations were found about women discrimination on jobs and remuneration and gender pay gap (see below Direct Request (CEACR) - adopted 2014, published 104th ILC session (2015) Equal Remuneration Convention, 1951 (No. 100) – Portugal). 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. Authority directly involved on employment rights and conditions is Work Conditions Authority (ACT) but for many reasons other authorities are related to the issue, as Immigration and Borders Services (SEF) social security services or even tax services. All of them can make inspections to different issues related to work, with the joining of policies authorities as GNR – Republican National Guard and PSP – Public Security Police. ACT has strategic Plans for Agriculture and Forest activities and also does integrated inspections with Spanish authorities for agriculture and forestry activities. Recently one notice state that ACT bought a drone to help agriculture and forestry inspections. Inspective activities of ACT and SEF result on penalties or suspensions when illegal situations are found. Based on the available information, it wasn't found any evidence that confirms the existence of risks of discrimination against in respect of employment and occupation in forestry in Portugal.
Means of Verification	Legislation Level of enforcement Regional, publicly available data from a credible third party Publicly available information (News and media)
Evidence Reviewed	Legislation: •Portuguese Constitution •Labour Code •Law n. º 7/09 from 12/02 http://www.act.gov.pt/(pt-PT)/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx •Dec-Law 42520/1959 23/09 at http://www.ilo.org/public/portugue/region/eurpro/lisbon/pdf/conv_111.pdf •Dec-Law 47 302/1966 on 04/11 at http://www.ilo.org/public/portugue/region/eurpro/lisbon/pdf/conv_100.pdf Other sources: •Transparency International http://www.transparency.org/cpi2015#map-container •UN Sanctions List at:https://www.un.org/sc/suborg/en/sanctions/un-sc-consolidated-list •World Bank: Worldwide Governance Indicators http://info.worldbank.org/governance/wgi/index.aspx#countryReports •Freedom house: https://freedomhouse.org/report/freedom-world/freedom-world-2016 •Committee to Protect Journalists https://www.cpj.org/reports/2014/04/impunity-indexgettingaway- 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 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 SEF Statistical Annual reports: http://sefstat.sef.pt/relatorios.aspx SEF Inspective news about forest sector: http://www.sef.pt/portal/v10/PT/aspx/noticias/Noticias_Detalhe.aspx?id_linha=7018 http://www.sef.pt/portal/v10/PT/aspx/noticias/Noticias_Detalhe.aspx?id_linha=6802 ACT Annual Reports: http://www.act.gov.pt/(ptPT)/SobreACT/DocumentosOrientadores/RelatorioActividades/Paginas/default.aspx 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 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
Risk Rating	Low Risk
Comment or Mitigation Measure	

	Indicator
2.7.5	The BP has implemented appropriate control systems and procedures for verifying that feedstock is supplied using labour where the pay and employment conditions are fair and meet, or exceed, minimum requirements.
Finding	Minimum wage is included in Portuguese constitution (Article 59th), and labour code. Portugal has ratified ILO convention about minimum wage C131 (1970) on year 1981. Also convention about salary protection C95 was ratified on year 1981. Payment and employment conditions are included and are updated on labour code. Authority directly involved on employment conditions is Work Conditions Authority (ACT) but for many reasons other authorities are related to the issue, as Immigration and Borders Services (SEF) social security services or even tax services. All of them can make inspections to different issues related to work, with the joining of policies authorities as GNR-Republican National Guard and PSP-Public Security Police. ACT has strategic Plans for Agriculture and Forest activities and also does integrated inspections with Spanish authorities for agriculture and forestry activities. Recently one notice state that ACT bought a drone to help agriculture and forestry inspections. Inspective activities of ACT and SEF result on penalties or suspensions when illegal situations are found. According to the available information about employment conditions, there is a legal framework in the country, and there are legal authorities to enforce legislation. So it is considered that Portugal has low risk that pay and employment conditions are not fair and doesn't meet, or exceed, minimum requirements. Low risk.
Means of Verification	Legislation Level of enforcement Regional, publicly available data from a credible third party Publicly available information (News and media)
Evidence Reviewed	Legislation: •Portuguese Constitution •Labour Code•: Law n. º 7/09 from 12/02 http://www.act.gov.pt/(pt-PT)/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx Dec-Law: 77/81 on 19/06 at http://www.ilo.org/public/portugue/region/eurpro/lisbon/pdf/conv_131.pdf Dec-Law: 88/81 on 14/07 at http://www.ilo.org/public/portugue/region/eurpro/lisbon/pdf/conv_95.pdf 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/aspx/noticias/Noticias_Detalhe.aspx?id_linha= 7018 http://www.sef.pt/portal/v10/PT/aspx/noticias/Noticias_Detalhe.aspx?id_linha= 6802 ACT Annual Reports: http://www.act.gov.pt/(ptPT)/SobreACT/DocumentosOrientadores/RelatorioActividades/Paginas/default.aspx 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 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
Risk Rating	Low Risk
Comment or Mitigation Measure	

	Indicator
2.8.1	The BP has implemented appropriate control systems and procedures for verifying that appropriate safeguards are put in place to protect the health and safety of forest workers (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 group and individual 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 estimate of 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 on 1700 inspections over 3 years reaching to 10 000 workers. The National Strategic Plan for The Health and Safety at Work 2015-2020 was launched on May 2016 and it stablishes the following strategic objectives: i) Promote the wellbeing at work and the competitiveness of companies; ii) Decrease work accidents on 30% and the incidence rate of work accidents on 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 dead), as well as the fatal accidents on forestry, agriculture and fishing sector (29 to 25) in the same period. [1] The primary sector accounts for around 20% of the fatal accidents occurring in one year in Portugal and employs around 7% of the employed population. More recent numbers from ACT (Work Authority) shows 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 on Forestry sector in 2014, 10 in 2015 and 6 in 2016. The number of fatal accidents reported was 2, 4 and 8 respectively, for the same period. Law nº 98/2009, September 4th, rules the regime for the repair of work accidents and occupational disease. (http://www.act.gov.pt/(pt-PT)/CentroInformacao/Estatistica/Paginas/default.aspx) 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]; – DGS (Direcção Geral de Saúde) [General Directorate of Health]; – ANPC (Autoridade Nacional de Protecção Civil) [National Civil Protection Authority]. 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: - 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; 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. The report “Relatório de Actividades ACT” [‘ACT Activities Report’] confirms that there has been a decrease in accidents at work in the primary sector. Nevertheless, the occurrence of work accidents on the primary sector are still considerably high when compared to other sectors. For this reason, specified risk is assessed for this indicator.
Means of Verification	Accredited professional courses (p.e. chainsaws, machinery operator, phytopharmaceuticals applicator) card and/or specific certificates of training sessions. Records of H& S procedures and Personal Protection Equipment distribution by the Organization. Record of machinery safety tools and equipment on original documental register.
Evidence Reviewed	[1] https://www.ine.pt/xportal/xmain?xpid=INE&xpgid=ine_indicadores&indOcorrCod=0006896&contexto=bd&selTab=tab2 ACT activity reports: http://www.act.gov.pt/(pt-PT)/SobreACT/DocumentosOrientadores/RelatorioActividades/Paginas/default.aspx Law nº7/2009, February 12th – Labour code of 2009 (articles 281º to 284º) 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 17º) and to the operation of the health and safety service at work (article 97º to 110º) Law nº 3/2014, January 28th – Second modification of the law nº 102/2009, September 10th, which approves the legal regime for the promotion of health and safety at work as well as the second modification of the Decree-law nº 116/97, May 12th, which brings to the internal legal order, the Council Directive nº93/103/CE, related to the minimum prescriptions of health and safety at the workplace and aboard fishing ships. Ordinance nº 255/2010, May 5th, establishes the requirement template for the authorization of common service, external service and exemption of the internal service of health and safety at the workplace. Ordinance nº 275/2010, May 19th, establishes the applicable fees on the processes for the authorization of Health and Safety at Work services. Ordinance nº71/ 2015, March 10th, approves the template of the heath fitness exam document. Decree-law nº2/82, May 5th, determines the obligation to report every case of occupational disease to the Caixa Nacional de Seguros de Doenças Profissionais Decree-law nº159/99, May 11th, modified by the Decree-law nº 382A/99, September 22nd, rules the mandatory insurance against workplace accidents for independent workers. Ordinance nº 256/2011, July 5th, Approves the uniform part of the general conditions of the compulsory insurance for accidents at work for employed persons, as well as their special uniform conditions Ordinance 137/94, March 8th, Approves reporting templates and maps relating to occupational accidents:

	http://www.act.gov.pt/(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 Ordinance53/71, February 23rd, Prevention of occupational risks and hygiene in industrial establishments, as amended by ordinance 702/80 of 22 September Decree law 141/1995, June 14th, Minimum requirements for safety and health at work signs; Ordinance 1456-A/95, December 11th, Regulates the minimum requirements for the placement and use of safety and health signs at work. D.L. No. 348/1993, of 1 October - minimum requirements for the safety and health of workers in the use of personal protective equipment; Ordinance 988/93, of 6 October - regulates the minimum safety and health requirements for workers in the use of personal protective equipment; Law no. 113/99, of 3 August - amends article 12 of Decree-Law no. 348/93 of 1 October on the protection of the safety and health of workers in the use of equipment for individual safety. D.L. No 330/1993 of 25 February - minimum safety and health requirements for workers in the manual handling of loads; Law no. 113/99, of August 3 - amends article 10 of Decree-Law no. 330/93 of 25 September on the protection of the safety and health of workers in manual handling of loads. Decree-Law no. 24/2012, of 6 February - consolidates the minimum requirements for the protection of workers against risks to safety and health due to exposure to chemical agents at work; Decree-Law no. 88/2015, of 28 May - amends Decree-Law no. 24/2012, of February 6, which consolidates the minimum requirements for the protection of workers against risks to safety and Exposure to chemical agents at work and transposes Commission Directive 2009/161 / EU of 17 December 2009) and (Amendment of Decree-Law no. 301/2000, of 18 November, which regulates the protection of workers against the risks related to exposure to carcinogens or mutagens during work; Decree-Law No. 301/2000, of 18 November - regulates the protection of workers against the risks related to exposure to carcinogens or mutagens during work; Order No. 27707/2007, of December 10 - Implementation of the REACH Regulation); Decree-Law no. 98/2010, of 11 August - establishes the regime for the classification, packaging and labelling of substances dangerous to human health or the environment; Decree-Law no. 220/2012, of October 10 - Classification, labelling and packaging of substances and mixture; Decree-Law no. 101/2005 of 23 June - prohibits the use and marketing of asbestos fibres and products containing these fibres in accordance with Annex I, point 16 and Annex II point 18; Decree-Law no. 266/2007, of July 24 - establishes the standards of health protection of workers against the risks of exposure to asbestos during work. Decree-Law 84/97, of 16 April, establishes the minimum requirements for the protection of the health and safety of workers against the risks of exposure to biological agents at work; Ordinance No. 405/98, of July 11 - approves the classification of biological agents; Ordinance No. 1036/98, of December 15 - amends the List of classified biological agents, contained in the annex to Administrative Rule no. 405/98, of July 11; Decree-Law No. 2/2001, of January 4 - regulates the contained use of genetically modified microorganisms, with a view to protecting human health and the environment. Decree-Law no. 182/2006 of 6 September - Minimum safety and health requirements for the exposure of workers to risks due to physical agents (noise) Decree-Law no. 46/2006, of 24 February - minimum safety and health requirements regarding the exposure of workers to risks due to mechanical vibration. D.L. No. 50/2005, of 25 February - minimum safety and health requirements for workers in the use of work equipment; D.L. No 103/2008 of 24 June - rules governing the placing on the market and putting into service of machinery and the placing on the market of partly completed machinery; Decree-Law no. 221/2006, of November 8 - establishes the rules regarding noise emission of equipment for use abroad. Decree-Law 103/2008, of June 24 - establishes the rules regarding the placing on the market and putting into service of the machines and their accessories; Decree-Law no. 75/2011, of 20 June - amends articles 3, 4, 12, 14 and 19 of Decree-Law no. 103/2008, Of 24 June, establishing the essential environmental protection requirements for the placing on the

	market and the Putting into service of pesticide application machines; Decree-Law no. 214/95, of August 18 - establishes the conditions of use and commercialization of used machines, aiming at the protection of the health and safety of users and third parties; Ordinance nº 172/2000, of March 23 - defines the complexity and characteristics of the used machines that are especially dangerous.
Risk Rating	Specified Risk
Comment or Mitigation Measure	Fill the audit form; Fill the audit suppliers table vs risk results; If necessary mitigation with training or notify the suppliers and logging workers If necessary delivery an informative manual to suppliers with the good practices.

	Indicator
2.9.1	Feedstock is not sourced from areas that had high carbon stocks in January 2008 and no longer have those high carbon stocks.
Finding	According to the National Inventory Report on Greenhouse Gases 1995-2015 developed by Portuguese Environment Agency (APA), Portuguese forest acted as a carbon sink in the period of the study with a net carbon sequester of 753,2 Gigagrams. Only forestry and agriculture showed this trend during the period of the study. Portuguese forest is defined by its recent origins and by heavy human intervention. In a general way, the Portuguese forest is recent. In Europe, Portugal is the country in which the transition from deforestation to reforestation occurred most rapidly: forest cover, which was between 4 and 7 per cent in 1870, grew in one century to cover more than 30 per cent of the continental territory. [1] In the best case scenario 7% of the territory can be potentially considered has old mature forest. According to the preliminary results of IFN6, p. 24, Table 11 [2], Matrix of change in total area by forest species and other soil uses between 2005 and 2010, the area occupied by species that could potentially constitute natural forests have had a positive net change of 13,803 ha, representing an increase of 0.97 per cent. See table 1 below. The Assessment report of the Compliance with the Convention on Wetlands of International Importance (RAMSAR) performed by the Portuguese Audit Office, process number 12/12[3] states that: “The 16 wetlands listed have, according to the Department of Management of Classified Areas - Wetlands, a good conservation situation (nine) or average (seven), and none of them presents significantly degraded conditions.”. In the Annex III of the document, an overview of the conservation situation of each listed wetland is presented. Regarding the outputs from the National Report on the Implementation of Habitats Directive 2013 [4], and referring to habitats that can be considered wetlands, even if not considered in RAMSAR conversion: 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 be considered as inadequate, on 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. 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. Habitat 4010 Northern Atlantic wet heaths with Erica tetralix: No threats or pressures related to forestry and silvicultural activities. Habitat 4060 Alpine and Boreal heaths:

	Favourable status assessed and no threats or pressures of high importance related to forestry and silvicultural activities. Habitat 4090 Endemic oro-Mediterranean heaths with gorse: Favourable status assessed and no threats or pressures related to forestry and silvicultural activities. Habitat 1150 Coastal lagoons: No threats or pressures related to forestry and silvicultural activities. Taking into account the above examples, it is possible to consider that forestry activities doesn't represent high importance threat or pressure for wetlands conservation and protection. Considering the same report, regarding peatlands: Habitat 7140 Transition mires and quaking bogs: No threats or pressures related to forestry and silvicultural activities. Habitat 7150 Depressions on peat substrates of the Rhynchosporion: No threats or pressures related to forestry and silvicultural activities. Through the revision of the information above and the interpretation of the positive trends showed by the Portuguese forest regarding the sequester of carbon, the risk for this indicator is considered as low.
Means of Verification	Maps, WebPages Procedures and records Regional, publicly available data from a credible third party The existence of a strong legal framework in the region Interviews with experts
Evidence Reviewed	[1] http://www.iniav.pt/fotos/editor2/5_solo_estrategia_nacional_alberto_gomes.pdf [2] http://www.icnf.pt/portal/florestas/ifn/resource/ficheiros/ifn/ifn6-res-prelimv1-1 [3] http://www.tcontas.pt/pt/actos/rel_auditoria/2012/2s/audit-dgtc-rel035-2012- 2s.pdf [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 United Nation Framework on Climate Change, National Inventory Submissions 2017, https://unfccc.int/national_reports/annex_i_ghg_inventories/national_inventories_submissions/items/10116.php
Risk Rating	Low Risk
Comment or Mitigation Measure	

	Indicator
2.9.2	Analysis demonstrates that feedstock harvesting does not diminish the capability of the forest to act as an effective sink or store of carbon over the long term.
Finding	Additionally, to the references on 2.9.1. 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. However, on its 2015 report it is stated the negative impact of forest fires (..) Estimates of emissions and sinks from land use change and forestry category show that this category has changed from being a net emitter in 1990 (1.8 Mt CO2 eq.) to a carbon sink in 1992. This situation was again reverted in the years 2003 and 2005 due to the severe forest wildfires events registered in these years. In 2013 this sector represents a sequester of -9.4 MtCO2e. Questions regarding forest fires are addressed at indicators 2.4.1 and 2.4.2. Under this information this indicator can be assessed al low risk.

Means of Verification	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
Evidence Reviewed	Estrategia 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) Relatório-de-Caracterizacão-da-FiLawra-Florestal-2014 http://www.aiff.org.pt/assets/Relatorio-de-Caracterizacao-da-FiLawra-Florestal- 2014-160p-CAPA-3-spread....pdf) Portuguese National Inventory Report on Greenhouse Gases 1990 – 2013 http://www.apambiente.pt/_zdata/Inventario/NIR_global_20151030_UNFCCC.pdf
Risk Rating	Low Risk
Comment or Mitigation Measure	