



# Supply Base Report: BSL Comércio Internacional, S.A

Scope Change Audit

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# Completed in accordance with the Supply Base Report Template Version 1.3

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## *Document history*

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# 1 Overview

Producer name: **BSL Comércio Internacional, S.A.**  
 Producer location: Headoffice: Rua Gonçalo Sampaio 329 4º Esq, Porto, 4150-367, PORTUGAL  
 Chipping operations: Porto de Aveiro - Terminal granéis sólidos, Porto de Aveiro, Aveiro, PORTUGAL  
 Geographic position: Headoffice: 41°09' N – 08°37' W  
 Chipping operations: 40°39' N – 08°43' W  
 Primary contact: Cecília Nolasco / Pedro Rodrigues – coc@bsl.pt  
 Company website: [www.bsl.pt](http://www.bsl.pt)  
 Date report finalized: 18/Dec/2020  
 Close of last CB audit: 18/Dec/2020  
 Name of CB: Control Union  
 Translations from English: Yes, to Portuguese  
 SBP Standard(s) used: Standard 1, v. 1.0;  
 Standard 2, v. 1.0;  
 Standard 4, v. 1.0;  
 Standard 5, v. 1.0.  
 Weblink to Standard(s) used: <https://sbp-cert.org/documents/standards-documents/standards>  
 SBP Endorsed Regional Risk Assessment: N/A  
 Weblink to SBE on Company website: <http://www.bsl.pt/madeira/>

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

## 2 Description of the Supply Base

### 2.1 General description

BSL is a woodchips producer located in Porto (Head office) with a mobile chipper located in port of Aveiro, that can receive wood and woodchips from all over Portugal.

The Supply base of BSL is Portugal Mainland and has a stable base of 4 - 5 suppliers, some of them are FSC and/or PEFC certified, but not all delivers the feedstock with a certification claim. The feedstock can be summarized in:

- 0% - 20% SBP-compliant primary feedstock (including FSC and PEFC)
- 80% - 100% SBP-controlled primary feedstock (including FSC Controlled Wood and PEFC Controlled Sources)

BSL has a production capacity about 25.000 tons of woodchips per year. Considering the total amount of feedstock that BSL processes, BSL is one of the largest woodchips producers in the north of Portugal. This activity contributes to the regional economy and to effective forest fire fighting – the main issue in Portuguese forestry today.

BSL only accepts wood from a short list species. Any of them are listed by CITES or IUCN:

#### **Main Species:**

- Maritime pine (*Pinus pinaster*)
- Scots pine (*Pinus sylvestris*)
- Monterey pine (*Pinus radiata*)
- Austrian pine (*Pinus nigra*)
- Stone pine (*Pinus pinea*)
- Eucalypt (*Eucalyptus spp.*)
- Poplar (*Populus spp.*)
- Acacia (*Acacia spp.*)

#### **Residual volumes of:**

- Portuguese oak (*Quercus faginea*), as secondary species, not from natural forest
- Champion oak (*Quercus rubra*), as secondary species, not from natural forest
- Weeping willow (*Salix babylonica*), as secondary species, not from riparian vegetation
- Planes (*Platanus spp.*), as secondary species, not from natural forest
- Chestnuts (*Castanea spp.*), as secondary species, not from natural forest
- Ash (*Fraxinus spp.*), as secondary species, not from riparian vegetation
- Alder (*Alnus spp.*), as secondary species, not from riparian vegetation

Although the Supply Base consists of the whole of Portugal, at present BSL is only purchasing wood from the central and northern administrative Districts of Portugal; in specific from:

- Aveiro;
- Bragança;
- Viseu;
- Porto
- Coimbra;



### *Figure 1. Districts of Portugal*

3.2 million ha of forests cover Portugal, corresponding to 35.4% of the country's land mass, followed by soil considered uncultivated (32%) and farmland (24%). Private property by landowners (83%), industrial companies (6%), and communities (Baldios, 8%) correspond to 3.1 million ha of forests. The forest area under communitarian management (Baldios) are subject to old customary and traditional rights and regulated by specific laws. In Portugal, there are, however, no indigenous people or specific minorities relying on the forests for their livelihood.

The following aspects related to forestry in Portugal are important to its sustainable management:

- 97% of the forest is in private ownership. More than half of the forests are very small parcels of only one or two ha (mainly in the northern and central regions). Regional forest management plans do not apply to small forests and woodlands;
- 47% of the land has no cadastral data and discrepancies in ownership rights complicate the procurement process. Moreover, many small woodland owners are not very interested in their properties (they can be living far away);
- Forest cover has increased from under 2.0 million to 3.2 million ha over the last 100 years and is dominated by introduced fast-growing species. Over the last decades, there is a tendency to replace semi-natural forests with fast-growing plantations.

Over the period 1995 – 2010 the forest decreased 4,6%. The net decrease of forest areas (150 611 ha) is mainly due to conversion to 'brush and pastures'. In addition, significant areas of forests were converted to urban use (28 000 ha). Data of different sources, for example the FAO, indicate a clear trend in decreasing forest area in Portugal of over 1% every 3 years the last 20 years or more.

Forest Management Plans (PGF) are mandatory for forest areas above a minimum area defined by Regional Forestry Management Plans (PROFs) as well as in Forest Intervention Areas (ZIF; 940 432 ha). In 2016, there were 1 680 000 ha under PGF from which 450 034 ha overlap the National Classified Areas Network. A felling manifest is required for commercial felling (including all thinning) of all tree species for industrial purposes, with a 30-day deadline after the operation is concluded, except in the case of conifers where there is an obligation to submit the "Manifesto" to the ICNF before forest intervention. According to DL n° 31/2020, of June 30, the "Manifesto de Corte" - phytosanitary manifesto - will become mandatory for all species. The DL n° 31/2020 also updates and adapts the previous model established by DL n° 174/88, of May 17, regarding the contents and information provided. This DL will take effect 180 days after the date of its publication (1<sup>st</sup> January 2021).

The Institute of Conservation of Nature and Forests (ICNF) is the national forest and conservation authority, with competencies on all forest, hunting and nature conservation affairs. ICNF also manages public forest areas and is involved in the management of community areas. Additionally, the Environmental Service of the National Republican Guard (SEPNA/ GNR) inspects environmental issues and natural resources in all private and public areas.



Figure 2: Tree species distribution

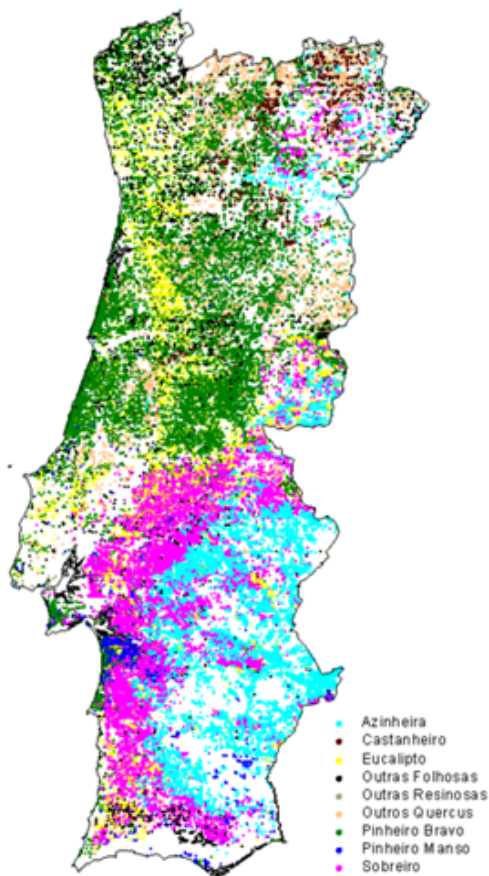
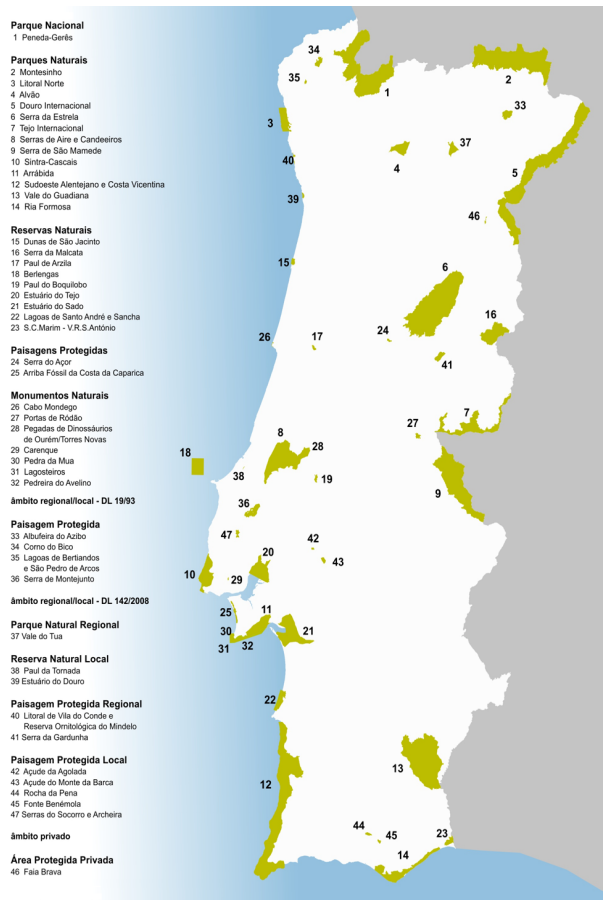


Figure 3: Protected areas



The felling phytosanitary manifest includes identification of the origin of the felling. Also, documentation for transportation mostly identifies the origin of the transport. This are the most common ways to trace the origin of the primary feedstock. However, there are still many areas in Portugal without cadastral data, complicating the matter. Considering the relatively positive Corruption Perception Index (2018) of Portugal (CPI 64) documents, such as invoices and transport documents, can be considered reliable sources of information.

Portuguese forests are 69% deciduous, and 31% coniferous. Regarding tree species, the most relevant are (ICNF, 2013):

- Eucalypt (*Eucalyptus globulus and other spp.*), 26% of forest area. Originally from Tasmania, eucalypt became one of the most planted trees in Portugal. Since the 1980's there is great controversy about the negative effects of these trees on soil fertility, water scarcity, and biodiversity, which in 1988 and '89 resulted in the implementation of a few laws that restricts the increase of monoculture plantation of this species. In 2017 a law was enforced that forbids the conversion of forests to eucalypt stands.
- Maritime pine (*Pinus pinaster*), 23% of forest area. This species was chosen in the large afforestation campaigns carried out during the nineteenth century, due to its ability to adapt to poor and rocky soil. In addition, it regenerates easily. Its timber is widely used commercially.
- The cork oak (*Quercus suber*), 23% of forest area.

This is an evergreen indigenous species, typical of Mediterranean climate forests. Their presence can be found throughout the country. The cork oak is often seen as the 'national tree' of Portugal. Portugal is the leading producer and exporter of cork.

- Holm oak (*Quercus rotundifolia*), 11% of forest area.  
An evergreen tree of large size. It can be found throughout the Mediterranean climate. It can grow at any type of terrain except of those with poor drainage and or saline nature, but prefers fertile soil, deep and of loamy nature. The wood is well suitable for charcoal and firewood production.
- Stone pine (*Pinus pinea*), 6% of forest area.  
Stone pine is mainly used to produce pine nuts. The residues from thinning and pruning are used for pellet production. Stone pine can mainly be found in the south.

The national legislation of Portugal does list protected tree species, and, for example, it is forbidden to cut any cork oaks (*Quercus suber*), and holm oaks (*Quercus ilix* / *Quercus rotundifolia*; protective measures by Law Nº.155/2004) and European holly (*Ilex aquifolium*; protected by Law Nº. 423/89).

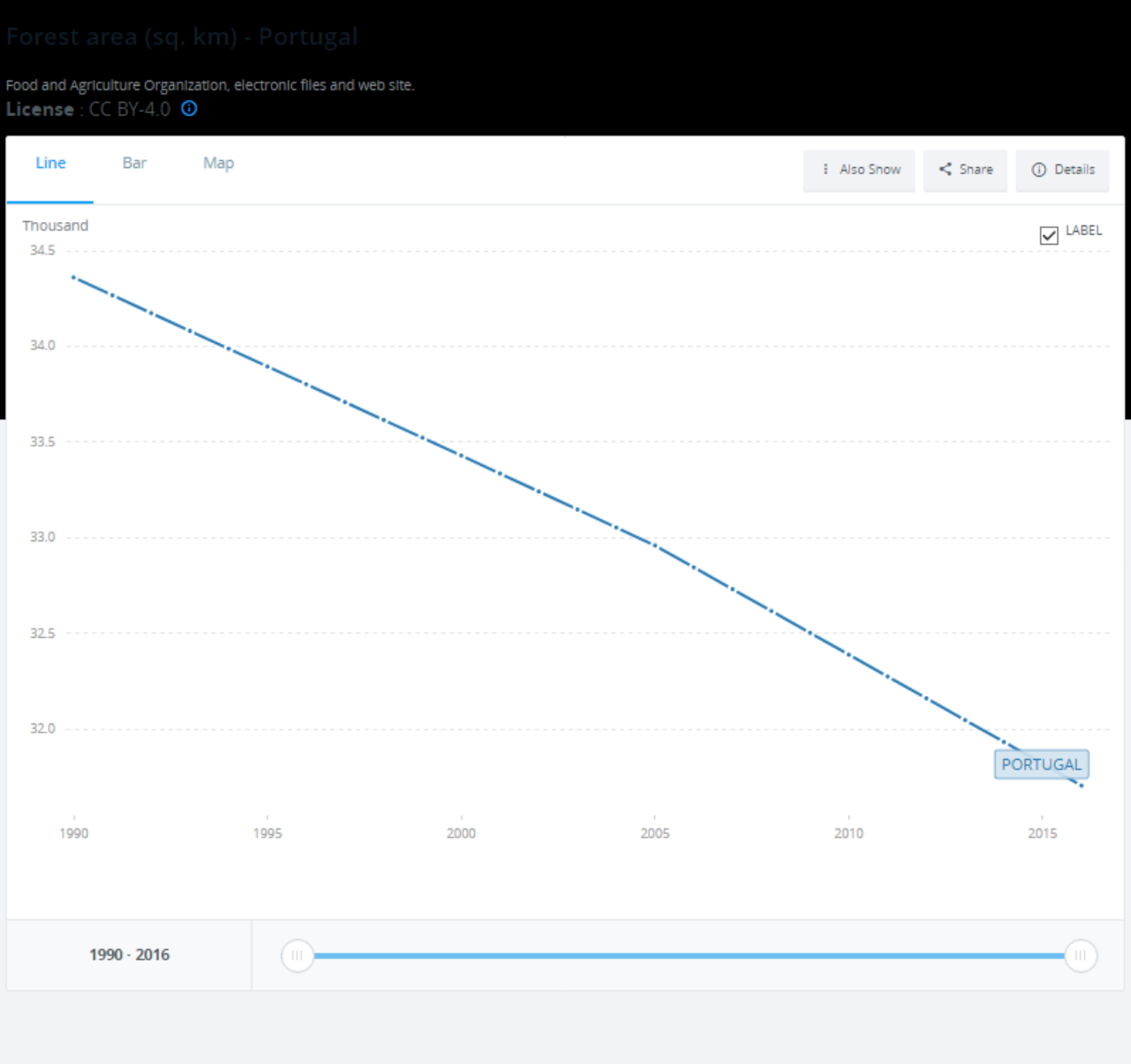
CITES (Convention on International Trade in Endangered Species of Wild Fauna and Flora) lists a considerable number of protected plants for Portugal. However, the list does not include any trees. The 'Red List' of the IUCN (International Union for Conservation of Nature and Natural Resources) indicates hundreds of plants for the continental territory of Portugal, but also does not include any trees either. Specialists reckon 49 of these plant species to the relevant ones for forestry.

Climate change, the occurrence of extreme meteorological events, in combination with large areas of insufficiently managed forests (especially eucalypt forests) has increased the phenomenon of devastating forest fires. Portugal accounts for the largest and the most forest fires in Europe. Climate change may also induce pests and diseases due to stress in host plants. In Portugal, phytosanitary problems affect mainly the cork oak and holm oak, showing its decline. The loss of vitality and the mortality of maritime pine is mainly related with the Wood Pine Nematode (WPN), detected in Portugal since 1999.

The forestry industry of Portugal is vertically integrated to derive maximum economic benefit from the three main forest tree species – maritime pine, eucalypt and cork oak. Maritime pine and eucalypt dominate the timber-producing regions. Forests of cork oak are generally multifunctional.

Goods produced by way of forestry activities sustain an important industrial chain based on natural resources that in turn supports a strong export sector. Portugal, therefore, considers forests and forestry products as an area of crucial importance to its economy. The forest sector has a significant impact on its GDP. Forest sector products contribute to around 10% of the national export. Forests are also the base of an economic sector which generates around 100 000 jobs (4% of the employable population).

Forest area (sq. km) Portugal Search data e.g. GDP, population, Indonesia



## 2.2 Actions taken to promote certification amongst feedstock supplier

BSL encourages FSC and PEFC certification among its suppliers, underlining the advantages and importance of forest certification to the wood sector.

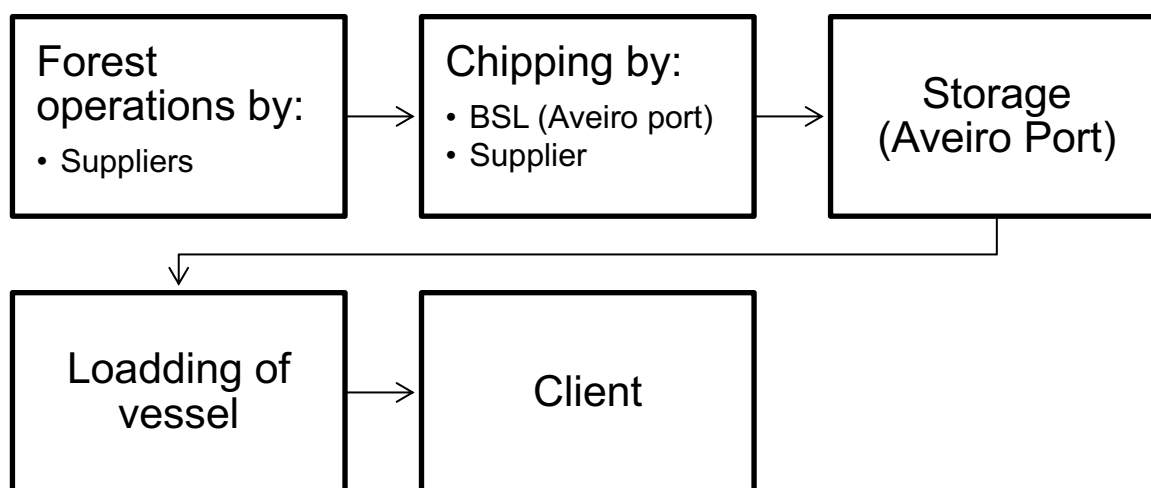
## 2.3 Final harvest sampling programme

BSL feedstock comes 0% from forest residues from final fellings or from forest maintenance operations, and approximately 100% comes from logs of final fellings. Most of final fellings are small, around 2 ha or less. In the north of Portugal clear cuts are restricted to maximally 10 ha. Reforestation is performed by the land owners.

From the species used by BSL, only the maritime pine (*Pinus pinaster*) could have a planned forest management period of more than 40 years, but BSL only uses low grade roundwood (co products). Eucalyptus is a fast-growing tree specie, with a rotation of less than 40 years.

BSL examines the forest plots and their age before harvest. The age of the forest is indicated on the “Manifesto de Corte”, which is supplied together with the feedstock, or through contacts with relevant parties and other credible public sources of information.

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



## 2.5 Quantification of the Supply Base

### Supply Base

- |                                     |   |
|-------------------------------------|---|
| a. Total Supply Base area (ha):     | 3,2 million ha  |
| b. Tenure by type (ha):             | Private: 3,1 million ha (97%, including 8% community managed)<br>Public: 0,1 million ha |
| c. Forest by type (ha):             | Temperate Forest: 3,2 million ha  |
| d. Forest by management type (ha):  | Plantations: 1,8 million ha;  |
| e. Certified forest by scheme (ha): | FSC: 480 thousand ha (2020)<br>PEFC 278 thousand ha (2020)                              |

### Feedstock

- |   |
|---|
| f. Total volume of Feedstock: 0 – 200,000 tonnes (25.820 tonnes)            |
| g. Volume of primary feedstock: 0 – 200,000 tonnes (25.820 tonnes)          |
| h. List percentage of primary feedstock (g), by the following categories:   |
| - 40%-21% Certified to an SBP-approved Forest Management Scheme (FSC+ PEFC) |

- 60%-79% Not certified to an SBP-approved Forest Management Scheme

i. List all species in primary feedstock, including scientific name

- Maritime pine (*Pinus pinaster*)
- Scots pine (*Pinus sylvestris*)
- Monterey pine (*Pinus radiata*)
- Austrian pine (*Pinus nigra*)
- Stone pine (*Pinus pinea*)
- Eucalypt (*Eucalyptus spp.*);
- Poplar (*Populus spp.*).
- Portuguese oak (*Quercus faginea*)
- Champion oak (*Quercus rubra*)
- Weeping willow (*Salix babylonica*)
- Acacia (*Acacia spp.*)
- Planes (*Platanus spp.*)
- Chestnuts (*Castanea spp.*)
- Ash (*Fraxinus spp.*)
- Alder (*Alnus spp.*)

j. Volume of primary feedstock from primary forest None

k. List percentage of primary feedstock from primary forest (j), Not applicable

l. Volume of secondary feedstock: None

m. Volume of tertiary feedstock: None

### 3 Requirement for a Supply Base Evaluation

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

BSL has chosen to implement the SBP Supply Base Evaluation method (SBP Standard 1), because in the north and centre of Portugal there are very many (a few hundred thousand) small forest owners with only one or two ha forest lands, and FSC, or PEFC group certification has only started to develop. Clients of industrial biomass, however, are demanding full deliveries of SBP-compliant biomass already today.

BSL is compromised to obtain international recognition considering the quality and sustainability of forest operations and is motivated to cooperate with forest harvesting companies to implement risk mitigation measures.

# 4 Supply Base Evaluation

## 4.1 Scope

The scope of this assessment covers Primary feedstock originating from Continental Portugal. Final products in the SBP certification scope are Wood chips and logs.

## 4.2 Justification

BSL has developed this current SBE on basis of SBP Standards N°1 and N°2, version 1.0 of March 2015, and using the current version of the Portuguese RRA Draft as a guide to interpretate the indicators. Following the “precautionary principle”, BSL has been pore strict in some interpretations of SBP indicators than the Portuguese RRA Draft.

BSL has developed a monitoring procedure to review forest operations on the field.

## 4.3 Results of Risk Assessment

Several indicators showed several specified risks, but BSL had standard operational procedures in place mitigating these risks, already before start of preparing for SBP certification and also some additional measures were implemented.

The result of the risk assessment was the identification of 14 specified risks within the supply base related to indicator 1.2.1, 2.1.1, 2.1.2, 2.1.3, 2.2.1, 2.2.2, 2.2.3, 2.2.4, 2.2.6, 2.3.2, 2.4.2, 2.6.1, 2.8.1 and 2.9.1.

Table 4.3: Risk Assessment Results of BSL

SBP Indicator	Indicators of specified risk
1.2.1 for areas without cadastral data	<p>The Biomass Producer has implemented appropriate control systems and procedures to ensure that legality of ownership and land use can be demonstrated for the Supply Base</p> <p>47% of the land area of Portugal has no Cadastral date. Moreover, the northern and central part of Portugal is characterised by hundred thousands of small private properties. The boundaries of these properties are sometimes disputable. Also the official registration of the property rights can be outdated. For practical reasons, landowners can decide to sell or transfer (inherit) parts of their property without registering the change to the government. Plots can be abandoned and the property rights can be unclear. Wood lands can also be impounded by the government.</p>
2.1.1 HCV 1+3	<p>The Biomass Producer has implemented appropriate control systems and procedures for verifying that forests and other areas with high conservation values are identified and mapped.</p> <p>The specified risks are HCV 1 Species diversity, and HCV 3 Ecosystems and habitats. Portugal has a decreasing biodiversity and most wood lands are managed by small landowners, to whom few requirements on sustainable forest management apply; there is no obligatory analysis of critical ecosystem values.</p> <p>The regional forest management plans are not obligatory for the holders of small forests and plantations. Species diversity, ecosystems and habitats are insufficiently protected considering the majority of the forest operations in the north and centre of Portugal.</p> <p>Small land owners and harvesting companies working on small plots do not need to draw attention to the organisations, websites and reports mentioned in the SBE in relation to this indicator. The parcels are normally simply clear cut.</p> <p>A threat to forests like forest fire is identified on maps, but is not addressed adequately by many forest owners. A lot of estates are not or poorly maintained. SEPNA forest guards do not check on this sufficiently.</p>
2.1.2 HCV 1+3	<p>The Biomass Producer has implemented appropriate control systems and procedures to identify and address potential threats to forests and other areas with high conservation values from forest management activities.</p> <p>HCV 1 – Species diversity There is a specified risk that forest operations on private and communitarian grounds and public areas not managed by ICNF could harm species diversity. Special attention Should be given to the National System of Classified Areas (SNAC) and to the Important Bird and Biodiversity Areas (IBAs).</p> <p>HCV 3 – Ecosystems and habitats There is a specified risk that forest operations on private and communitarian grounds and public areas not managed by ICNF could harm ecosystems and habitats.</p>
2.1.3	<p>The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not sourced from forests converted to production plantation forest or non-forest lands after January 2008.</p> <p>There are no assurances, new eucalypt plantations from after January 2008 are not already maintained or harvested. Moreover, the forest fires result in instant harvesting of plantations, regardless of their age. Besides, poplar and other tree species can be considered a plantation and the new law only covers Eucalyptus.</p> <p>In practise there will be many issues with regard to this indicator on land conversion in the future as well. The government has too little information on the present landcover and too little capacity to implement the new legislation in full. For example, after a forest fire, it will be difficult to determine if illegal conversion to plantations are taking place, regarding the many effected</p>



	<p>woodland parcels and timeframe for regenerating forest areas. Besides, eucalypt plantations can result in aggressive natural regeneration after forest fires, and in that case, little can be done to avoid conversion of neighbouring plots.</p> <p>The conversion of forests to urban and agricultural use is significant. In total, the forest area decreased by 150 611 ha (between 1995 and 2010, according to the 6<sup>th</sup> National Forest Inventory of the ICNF). Over the last decades, Portugal has a negative trend concerning forest area. The ICNF, however, states that the increase of wood lands excels the decline in forests. FAO statistics (2016) show a decrease in forest and agricultural area in Portugal. The new law on restricting conversion to eucalypt plantations does not safeguard this issue sufficiently.</p>
<b>2.2.1</b>	<p>The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them.</p> <p>To most small owners no forest management plan applies, the regional forest plans apply only to plots above a certain size.</p>
<b>2.2.2</b>	<p>The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is sourced from forests where management maintains or improves soil quality.</p> <p>In approximately half the country there is a risk of degradation of (dry) soils, mainly due to previous land-use practices and choice of introduced tree species. The problem of desertification has existed for centuries and has now become worse due to climate change. The plantations of eucalypt need fertilisation or deplete the soil. Soil quality also depends on the availability of fresh water.</p>
<b>2.2.3</b>	<p>The Biomass Producer has implemented appropriate control systems and procedures to ensure that key ecosystems and habitats are conserved or set aside in their natural state.</p> <p>In Portugal, key ecosystems and habitats are mostly located in protected areas and in Classified Areas (Natura 2000). However, approximately 2/3 of classified areas are not included in protected areas of the National Network of Protected Areas. Besides, there are key ecosystems and habitats occurring outside Protected and Classified areas. In practise, landowners and harvesting companies have too little knowledge of key-habitats and which habitats need to be conserved.</p>
<b>2.2.4</b>	<p>The Biomass Producer has implemented appropriate control systems and procedures to ensure that biodiversity is protected.</p> <p>About 3 600 species of plants can be found in Portugal. There are 69 taxa of terrestrial mammals, a total of 313 bird species, of which around 35% are threatened, and 17 amphibians and 34 reptile species that are present in Portugal. Some of the main threats to the biological diversity of Portugal include: alteration or destruction of habitats; pollution; overexploitation; invasive alien species; urbanization and fires. This, in combination with the fact that there are many small parcels to which few regulations apply and the aggressive nature of Eucalyptus vegetations puts biodiversity under pressure. Several sources report its decline.</p>
<b>2.2.6</b>	<p>The Biomass Producer has implemented appropriate control systems and procedures to verify that negative impacts on ground water, surface water and water downstream from forest management are minimised.</p> <p>The thresholds mentioned by law are 50 ha and 10 ha. This are still large areas regarding the populated and hilly countryside of Portugal. A clear-cut area of less than 10 ha can easily create runoff and erosion dangers. The landscape can create dangerous situations; residents could be living in the valley. Small land owners are not obliged to take risks to the surroundings into consideration. These risks can also be related to water lines.</p>
<b>2.3.2</b>	<p>Adequate training is provided for all personnel, including employees and contractors.</p> <p>Despite legal requirements, Portugal still performs poorly on work efficiency (and safety). The National Strategy for Forests states that the focus on the professionalization and training of the different actors in the forestry sector is of key importance for increasing the competitiveness and, thereby, the development of the sector.</p>

<b>2.4.2</b>	The Biomass Producer has implemented appropriate control systems and procedures for verifying that natural processes, such as fires, pests and diseases are managed appropriately.
	Considering the lack of an implementation of forest management plans and forest debris cleaning, the risk of forest fires is high. Fires are today the greatest perceived risk in the Portuguese forest sector. Biotic and abiotic risks are supported by disturbances affects. The forests and in particular the eucalypt plantations have to be manged according to best practises or the risk of forest fire is significant.
<b>2.6.1</b>	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.
	Considering the situation in Portugal this indicator needs additional attention to perform sufficiently well on social aspects related to sustainable forest management and best practices. There are many land owners with small properties in Portugal. Some regions of the country lack cadastral data, which gives problems on assessing the boundaries of harvesting plots. It is crucial to identify and solve grievances and disputes before the harvesting operations commence (with special attention to the indicators, which are categorised 'specified risk'). Land owners and harvesting companies normally do not actively implement complaint procedures and do not keep records on complaints and comments. This indicator is important to perform sufficiently on several other indicators.
<b>2.8.1</b>	The Biomass Producer has implemented appropriate control systems and procedures for verifying that appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12).
	Regardless of its legal requirements, Portugal still performs poorly on work safety. International Trade Union Confederation (IUTC) ranks countries against 97 indicators to assess where workers' rights are best protected. Portugal has a rating of 3 (from 1 to 5+). This score is given for countries where: There are 'Regular violations 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.'
<b>2.9.1</b>	Feedstock is not sourced from areas that had high carbon stocks in January 2008 and no longer have those high carbon stocks.
	There is a specified risk of reducing carbon stocks in certain areas. This risk is more specifically related to the risks mentioned in the following indicators: a. 2.1.3 (land conversion), and b. 2.2.2 (degradation of grounds).  Data of different sources, for example the FAO, indicate a clear trend in decreasing forest area in Portugal of over 1% every 3 years the last 20 years or more. For example, the conversion of forests to urban use is significant. In total, the forest area decreased by 150 611 ha between 1995 and 2010, according to the ICNF.

Note: In case a forest management plan has been developed (by the government, or by private entities) several indicators could be considered low risk. To be sure this BSL checks if:

- The plan applies to the forest plot and is considered (regarding the minimal size of the plot)
- Since the development of the plan, there have not been significant disturbances to the forest area, like forest fires, that should change the decision-making process in forestry management
- The plan sufficiently prescribes best practices in Sustainable Forest Management (forest management plans tend to address the ecological aspects sufficiently, but social aspects could be underexposed).

In case a forest management plan passes these pre-conditions, the following indicators can normally be indicated as low risk: 1.2.1; 2.1.1; 2.1.2; 2.2.1; 2.2.2; 2.2.3; 2.2.4; 2.2.6; and 2.9.1 partly (regarding 2.2.2).

## 4.4 Results of Supplier Verification Programme

BSL has studied all the indicators of SBP Standard 1 in relation to the scope of the SBE and categorised all indicators as either low risk or specified risk. Therefore, a Supplier Verification Program was not needed.

## 4.5 Conclusion

The conclusions of this report are based on a multi-focus analysis, including opinions on possible risks already identified with an impact on the three sustainability vectors (economic, social, environmental).

In terms of raw material purchases, discussion points and opinions on possible sustainability risks in feedstock procurement in Portugal have been studied in detail over the last years by a broad group of stakeholders and institutes. In general, there is a good understanding of the necessity of performing additional mitigating measures.

Forest ownership in Portugal is fragmented; there are many small holders, it is therefore clear that several forest management tasks, starting with an evaluation of ecological, economic and social impacts of operational plans should be considered before and during the forest operations commence.

Within the framework of the FSC Controlled Wood and Due Diligence evaluations, several mitigation measures were already in place.

Regarding legality, 1 SBP indicator was assessed 'specified risk', but only partly. Regarding sustainability, 13 SBP indicators were assessed 'specified risk', of which 4 partly.

BSL categorised indicator 2.6.1 as specified risk, because of its important function as a safety net for sufficient performance on social and cultural aspects of Sustainable Forest Management, as also because of its importance in relation to complying with other specified risks.

There is an overlap in the root causes of most specified risks. They mainly derive from a few fundamental characteristics of forestry in Portugal, such as:

- Dominance of eucalypt in forestry. This introduced specie quite controversial regarding the risk and impacts on sustainability. Its use needs to be monitored and contained.
- More than half of the harvesting forest plots are very small (smaller than 1 ha) and privately owned areas (mainly in the northern and central regions of Portugal), to which regional forest management plans do not apply;
- Lacking cadastral data (on 47% of the land) and other problems related to the not updating of registration of ownership rights.

These specified risks are, however, well mitigatable. Moreover, perception of corruption in Portugal is relatively low, what is confirmed by the CPI score of 64 points (2018).

Forestry in Portugal has a long history and a solid framework, at the level of relevant entities such as the ICNF itself, education and training entities, as well as at the level of local and central authorities.

# 5 Supply Base Evaluation Process

The Supply Base Evaluation (SBE) was performed by Rogelio Gonzalez, Ineva, with the internal support of Cecilia Nolasco from the BSL Chain of Custody Team and her manager, Pedro Rodrigues, also responsible for the operations of the BSL Group, being directly involved in prospecting and supporting the decision to buy wood (raw material) ), as well as inspections / visits to the field.

Rogelio Gonzalez (forestry Engineer) has around 20 years of experience in forest FSC and PEFC certification. He passed the SBP auditor exams in 2019.

The Supply Base Evaluation Process started with public reports into consideration, as also european, national legislation, national and regional policies, and publications of relevant institutions and authorities. During the preparation of the SBE, a detailed baseline study was made for each of the SBP indicators. A summarised description on each indicator is presented in Annex 1 and covers all relevant indicators of SBP Standard 1.

The certification team took the following steps in developing the Supply Base Evaluation:

- Study the draft SBP National Risk Assessment and compare it with BSL's own experience and procedures
- Study publicly available reports on the legality and sustainability risks in Portugal;
- Develop the Risk Assessment and Risk Mitigation Measures in cooperation with BSL's suppliers;
- Develop procedures and check-lists related to the assessment of forestry operations and feedstock procurement;
- Training the harvesting teams of the most developed feedstock suppliers;
- Evaluate the effectiveness of the Risk Mitigation Measures in practice (during harvesting operations).

The Forestry Manager is a specialist, who has been involved in wood procurement and field inspections for many years.

The documents stated below are of importance to the management system:

- Signed declarations of selected feedstock suppliers;
- Documentation accompanying feedstock supply (verifying the origin of the wood);
- Procedure on the legality and origin of raw material;
- Best practices regarding harvesting operations;
- Sampling and monitoring procedure;
- Assessment reports and checklists on:
  - Planned forest operations (field inspections/visits);
  - Primary feedstock suppliers (companies);
- Complaint procedures and journals.

The Risk Assessment (RA) did not result in inconclusive indicators (see paragraph 4.3).

## 6 Stakeholder Consultation

The risk assessment has been sent to a group of over 145 stakeholders and leading experts in nature conservation and forestry. The stakeholder consultation was open from 28th July, till 28th August 2020.

### 6.1 Response to stakeholder comments

The stakeholder consultation did not result in any comments.

# 7 Overview of Initial Assessment of Risk

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

Indicator	Initial Risk Rating		
	Specified	Low	Unspecified
1.1.1		X	
1.1.2		X <sup>2</sup>	
1.1.3		X	
1.2.1	X <sup>1</sup>		
1.3.1		X	
1.4.1		X <sup>2</sup>	
1.5.1		X	
1.6.1		X	
2.1.1	X <sup>3</sup>		
2.1.2	X <sup>3</sup>		
2.1.3	X <sup>7</sup>		
2.2.1	X		
2.2.2	X		
2.2.3	X		
2.2.4	X		
2.2.5		X	
2.2.6	X		
2.2.7		X	
2.2.8		X	
2.2.9		X	
2.3.1		X	
2.3.2	X		
2.3.3		X	
2.4.1		X <sup>4</sup>	
2.4.2	X <sup>5</sup>		
2.4.3		X	
2.5.1		x	
2.5.2		x	
2.6.1	X <sup>6</sup>		
2.7.1		x	
2.7.2		x	
2.7.3		x	
2.7.4		x	
2.7.5		x	
2.8.1	X		
2.9.1	X <sup>7</sup>		
2.9.2		x	
2.10.1		x	

- 1) Specified risk for areas without cadastral data.
- 2) These legality indicators are low risk, nevertheless, BSL has procedures on verifying a few essential aspects.
- 3) HCV 1 and 3 are specified risk.  
Social and cultural aspects regarding Sustainable Forest Management are considered low risk but are checked during the evaluation of best practises.
- 4) This sustainability indicator is low risk, nevertheless, BSL does assess the possible impact of harvest operations on the forests and their surroundings (also considering local residents and entrepreneurs) during field inspections/contacts.
- 5) Specified risk on forest fire-fighting.
- 6) The mitigation measures of this indicator are important in reducing the risks related to all social aspects of sustainability.
- 7) Of importance is the negative trend in forest cover (and loss of carbon stocks) over the last 20 years, due to the conversion to agricultural and urban lands.

# 8 Supplier Verification Program

## 8.1 Description of the Supplier Verification Program

The Risk Assessment had no inconclusive indicators (no 'unspecified risks'). The results have been discussed with feedstock suppliers and other stakeholders. The indicators, risks, and mitigation measures were clear.

## 8.2 Site visits

Not applicable.

## 8.3 Conclusions from the Supplier Verification Program

Not applicable.

# 9 Mitigation Measures

## 9.1 Mitigation measures

The mitigation measures per indicator are given in the table below.

Table 9.1 Risk Mitigation Measures Summary

1.2.1	<b><i>The Biomass Producer has implemented appropriate control systems and procedures to ensure that legality of ownership and land use can be demonstrated for the Supply Base</i></b>
for areas without cadastral data          <b>Mitigation measures</b>	<p>BSL does not buy any wood from unknown sources and wood suppliers without a valid company registration, nor from wood lands of which the owner rights are disputed. BSL does not get involved in issues that must be settled by the suppliers (loggers and forest owners). However, any eventual dispute, concerning the ownership of the wood, needs to be solved first. When starting business relationship with the owner or a wood supplier, BSL investigates if cadastre data are available and if not, additional investigations are conducted by means of legal document research and extends to, for example, interviewing/contacts local stakeholders (owners of neighboring wood lands) and local authorities, whenever:</p> <ul style="list-style-type: none"> <li>• Cadastral data are unavailable.</li> <li>• There are complaints about the land owner, or the harvest operation.</li> </ul> <p>If Cadastral data are unavailable, or if there are complaints about the land owner, or the harvest operation, these mitigation measures are executed:</p> <ul style="list-style-type: none"> <li>• Identification of the plot / area;</li> <li>• Identification of the owner;</li> <li>• Proof of the relationship between the seller and the land in question;</li> <li>• Formalization of the business through a purchase and sale agreement;</li> </ul> <p>If there is still doubts about the ownership of the land, interviews with stakeholders and field visits are conducted to collect all information. If ownership cannot be confirmed the wood cannot be purchased or be accepted as SBP compliant.</p> <p>From 01 January 2021, the Manifest document will be used as a evidence of fulfilment of this indicator.</p>
2.1.1	<b><i>The Biomass Producer has implemented appropriate control systems and procedures for verifying that forests and other areas with high conservation values are identified and mapped.</i></b>
HCV 1 & 3	<p>The control system for feedstock, which also includes regular follow-up of suppliers and whenever necessary, at scheduled intervals, inspections to suppliers' processes, are duly implemented. All used material is traceable to its origin through the harvest manifests and/or transport guides. All suppliers must comply with the laws in force, which are supervised by the Tax Authority and the ICNF.</p> <p>BSL identifies and maps areas with high conservation values (HCVs) before the harvest commences. HCV 1 and 3 were assessed to have a specified risk, that's why extra effort is needed to identify and map these values in practice on paper, regarding the forest plot. Internet sources, as well as the local situation needs to be well studied.</p> <p>Some HCV areas are designated as protected and classified areas at the national or EU level (Natura 2000). There are also smaller areas or biotopes important to biodiversity or classified as priority species' habitats. Habitats and species vulnerable to forestry operations are identified within the scope of Reed Natura2000 and Habitats and Birds Directive reports.</p> <p>Steps taken:</p> <ul style="list-style-type: none"> <li>• Study publicly available sources (internet sites) and other information regarding the plots where harvesting operations are planned and their surroundings;</li> <li>• Inform feedstock suppliers on found results regarding possible risks in front;</li> </ul>



<p><b>Mitigation measures</b></p>	<ul style="list-style-type: none"> <li>• Onsite assessment of the plots and their surroundings prior to harvesting, measures are taken for example, when habitats are found;</li> <li>• Development of adaptations to the harvesting plans, if needed.</li> </ul> <p>Below the main sources of information, used to prepare the identification of these values for our suppliers. The forestry specialist evaluate every plot before the harvesting operations begins. BSL monitors and/or inspects the suppliers and harvesting areas.</p> <p><b>HCV 1 – Species diversity</b></p> <p>There is a specified risk that forest operations on private and communitarian grounds and public areas not managed by ICNF could harm species diversity. Species diversity is evaluated and recorded before harvesting operations commence. Caution and best practises are applied. Special attention is given to the National System of Classified Areas (SNAC) and to the Important Bird and Biodiversity Areas (IBAs). See also below, indicator 2.2.4</p> <p><i>Some information sources:</i></p> <ul style="list-style-type: none"> <li>• Classified areas: <a href="http://www.icnf.pt/portal/naturaclas/cart">http://www.icnf.pt/portal/naturaclas/cart</a> and HABEAS (WWF): <a href="http://www.habeas-med.org/webgis/pt_en/">http://www.habeas-med.org/webgis/pt_en/</a></li> <li>• Protected area plans: <a href="http://www.icnf.pt/portal/naturaclas/ordgest/poap">http://www.icnf.pt/portal/naturaclas/ordgest/poap</a></li> <li>• Endangered species: <a href="http://www.icnf.pt/portal/naturaclas/patrinatur/especies">http://www.icnf.pt/portal/naturaclas/patrinatur/especies</a></li> <li>• Endemic species: <a href="http://naturdata.com/index.php?option=com_content&amp;view=article&amp;id=78&amp;Itemid=60">http://naturdata.com/index.php?option=com_content&amp;view=article&amp;id=78&amp;Itemid=60</a></li> <li>• Digital mapping information from the Manual das Linhas Eléctricas [Manual of Electric Lines] (ICNB 2008)</li> <li>• Important Bird Areas of Portugal at: <a href="http://ibas-terrestres.spea.pt/">http://ibas-terrestres.spea.pt/</a></li> <li>• Regional Forest Plans (PROF): <a href="http://www.icnf.pt/portal/florestas/profs">http://www.icnf.pt/portal/florestas/profs</a></li> </ul> <p><b>HCV 3 – Ecosystems and habitats</b></p> <p>There is a specified risk that forest operations on private and communitarian grounds and public areas not managed by ICNF could harm ecosystems and habitats. In these situations, BSL demands to evaluate the environmental impacts (on Ecosystems and habitats) of the forest operations before the forest operations commence. Caution and best practises are applied. See also below, indicator 2.2.3.</p> <p><i>Some information sources:</i></p> <ul style="list-style-type: none"> <li>• Habitats Directive (2007-2012)</li> <li>• Rede Natura 2000 data base: <a href="http://www.icnf.pt/portal/naturaclas/rn2000">http://www.icnf.pt/portal/naturaclas/rn2000</a></li> <li>• Important Bird Areas of Portugal at: <a href="http://ibas-terrestres.spea.pt/">http://ibas-terrestres.spea.pt/</a></li> <li>• Convention on Biological Diversity (CBD) via DL no. 21/93, dated 29 June.</li> </ul>
<p><b>2.1.2</b></p>	<p><b><i>The Biomass Producer has implemented appropriate control systems and procedures to identify and address potential threats to forests and other areas with high conservation values from forest management activities.</i></b></p>
<p>HCV 1 &amp; 3</p>	<p>There is a specified risk that forest operations on private and communitarian grounds and public areas not managed by ICNF could harm species diversity, ecosystems and habitats. Species diversity is evaluated and recorded before harvesting operations commence. Special attention is given to the National System of Classified Areas (SNAC) and to the Important Bird and Biodiversity Areas (IBAs).</p> <p>BSL identifies and addresses potential threats to forests and other areas with high conservation values (HCVs). The control system for feedstock, which also includes regular follow-up of suppliers and whenever necessary, at scheduled intervals, inspections to suppliers' processes, is duly implemented. Some HCV areas are designated as protected and classified areas at the national or EU level (Natura 2000). There are also smaller areas and biotopes important to biodiversity, which can be classified as priority species' habitats.</p> <p>Steps taken:</p> <ul style="list-style-type: none"> <li>• Desk Assessment of possible impacts of harvesting operations, regarding Publicly available information from credible third parties;</li> <li>• Training of suppliers on identification of forests with HCVs, and methods to protect HCVs;</li> <li>• Identification and mapping of protected species, habitats and key ecosystems on the plot before harvesting;</li> </ul>

<b>Mitigation measures</b>	<ul style="list-style-type: none"> <li>• Development of adaptations to the harvesting plans, if needed;</li> <li>• Harvesting according to best practices in sustainable forest management;</li> </ul> <p>See also below, indicator 2.2.4 and indicator 2.2.3.</p>
<b>2.1.3</b>	<b><i>The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not sourced from forests converted to production plantation forest or non-forest lands after January 2008.</i></b>
<b>Mitigation measures</b>	<p>BSL considers all pine stands as forests and eucalypt and poplar stands as plantations. BSL checks if forests have been changed to eucalypt or poplar plantations after 2008. When forest is converted to agricultural land or a plantation, or when land use change (conversion) is planned, the feedstock is not categorized as SBP compliant.</p> <p>When a eucalypt or poplar plantation are cut, the history of the plantation is investigated:</p> <ul style="list-style-type: none"> <li>• The year of conversion to plantation (if it was converted after 2008). If needed, interviews with stakeholders and residents are taken and the plot is searched for tree stumps.</li> <li>• Was it a forest before being converted to plantation?</li> </ul> <p>This is dealt with in the Feedstock Supplier Declaration and addressed in the field operations checklist.</p>
<b>2.2.1</b>	<b><i>The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them.</i></b>
<b>Mitigation measures</b>	<p>In case no forest plan is available (no PROF, PGF ZIF, PUB, SNAC, as well as no PEFC or FSC certification), or a plan is available but does not apply to a small holder, an additional assessment of environmental impacts is made and recorded before harvest. Special attention is given to plots smaller than the minimum threshold for the mandatory Forest Management Plan (PROF) and outside the SNAC.</p> <p>Before harvesting operations, the plot could be visited and evaluated, by BSL or its suppliers:</p> <ul style="list-style-type: none"> <li>• The possible economical, ecological and social impact of the forest operations, including its surroundings. Harvesting plans can be changed to avoid negative impacts;</li> <li>• Was the forest management conform the law in the recent past (has the forest been cleaned according to the law in the past);</li> <li>• Specific Plans for Forest Intervention (PEIF) are studied for 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);</li> <li>• Potential impacts of operations on ecosystems and biodiversity are identified. Impacts inside and outside the area of operation are considered, for example downstream;</li> <li>• Impacts are monitored and monitoring results are used to improve operational practices.</li> </ul> <p>Indicators 2.2.2, 2.2.3, 2.2.4, 2.2.6, and 2.4.2 include relevant management measures which are checked.</p>

2.2.2	<b><i>The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b).</i></b>
Mitigation measures	<p>Before harvesting operations commence the plot is evaluated. Manual of good practices is implemented.</p> <p>Best forestry practices apply:</p> <ul style="list-style-type: none"> <li>• Were needed, considering the soil and groundwater level, only selective cuttings and small clear cuts of maximally 5 ha are planned;</li> <li>• Regeneration focusses on tree species that maintain or improve soil quality;</li> <li>• Leave nutrients in the forests, mainly the green fraction of forest residues less or equal to 3 cm (on the other hand other forest residues need to be cleared to prevent forest fires.</li> <li>• Do not operate near-water areas.</li> <li>• Fertilization of the ground, when needed and possible.</li> </ul> <p>On dry locations selective cuttings are often preferable, because the ground gets less direct impact of the sun and the forest can maintain soil quality and regenerate naturally.</p> <p>Poor soil quality can lead to erosion and other problems. Therefore, this indicator is related to indicator 2.2.6.</p>
2.2.3 & 2.2.4	<b><i>The Biomass Producer has implemented appropriate control systems and procedures to ensure that key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b). &amp; The Biomass Producer has implemented appropriate control systems and procedures to ensure that biodiversity is protected (CPET S5b).</i></b>
Mitigation measures	<p>BSL prepares (publicly available) data on ecosystems and habitats (see above 2.1.1 on mapping and 2.1.2 on identifying and addressing potential threats). This information is given to all feedstock suppliers. Feedstock suppliers are trained and /or informed to recognise key ecosystems and habitats.</p> <p>Steps in risk mitigation:</p> <ul style="list-style-type: none"> <li>• Training, assessing and/or information to suppliers;</li> <li>• Desk assessment (before harvesting operations commence) of key ecosystems and habitats: <ul style="list-style-type: none"> <li>○ All classified areas:</li> <li>○ National Network of Protected Areas;</li> <li>○ Special Areas of Conservation (SAC);</li> <li>○ Special Protection Areas (SPA);</li> <li>○ Ramsar sites;</li> <li>○ Important Bird Areas (IBA);</li> <li>○ Priority habitats in Natura 2000 network;</li> <li>○ Areas where threatened species occur;</li> <li>○ Areas where endemic species of the Iberian Peninsula occur;</li> <li>○ Areas where seasonal concentrations of species occur;</li> <li>○ Large landscape level forests;</li> <li>○ Important areas for watershed protection;</li> </ul> </li> <li>• Forest plot inspection prior harvesting;</li> <li>• Mapping of the harvesting plot, indicating key ecosystems, habitats and objects of importance to biodiversity; making photos prior to harvesting.</li> <li>• Best forestry practices, including measures to conserve and increase biodiversity (for example, standing dead wood.</li> <li>• Change of operational plan, if necessary.</li> </ul>
2.2.6	<b><i>The Biomass Producer has implemented appropriate control systems and procedures to verify that negative impacts on ground water, surface water and water downstream from forest management are minimised (CPET S5b).</i></b>
Mitigation measures	BSL monitors the harvesting operations of its feedstock suppliers. Best practices are required to comply with the SBE program requirements:

	<ul style="list-style-type: none"> <li>• Desk assessment (before harvesting operations commence) of Important areas for watershed protection: <ul style="list-style-type: none"> <li>○ Cork oak and holm oak savannas located in areas with an aquifer recharge rate of over 175 mm/year</li> <li>○ Aquifers</li> </ul> </li> <li>• The plots and the surroundings (hill slopes and streams) are inspected on: <ul style="list-style-type: none"> <li>○ Runoff problems (regarding the landscape, onsite and in the surroundings);</li> <li>○ Groundwater level problems (too high or too low);</li> <li>○ Protection of riversides and (lake) coastlines;</li> </ul> </li> <li>• In areas vulnerable to water damage, the maximal contiguous clear cut area is 5 ha;</li> </ul> <p>Best forestry practices; Feedstock suppliers are trained to not contaminate ground water and to plan forest management operations that protect the soil, forest and surroundings from surface water runoff; Runoff of elements of fertilizers and pesticides into the surrounding environment</p>
<b>2.3.2</b>	<b><i>Adequate training is provided for all personnel, including employees and contractors (CPET S6d).</i></b>
<b>Mitigation measures</b>	<p>BSL trains and/or informs its personnel and its suppliers on all relevant aspects:</p> <ul style="list-style-type: none"> <li>• Training/information records obligatory according to legislation and necessary records of qualification are collected during supplier following process and checked during supplier visits;</li> <li>• Training/information conducted by BSL in several fields, including identification of key ecosystems, habitats and species biodiversity (annually and additionally based on the results of the plot assessments);</li> <li>• Training/information on best forest management practices.</li> <li>• Training, assessing and/or information to suppliers.</li> </ul> <p>The level of knowledge of personnel is inspected during site visits.</p>
<b>2.4.2</b> Forest fires	<b><i>The Biomass Producer has implemented appropriate control systems and procedures for verifying that natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b).</i></b>
<b>Mitigation measures</b>	<p>Visual inspection of the plot before harvesting (checklist). Checked is if the plot was managed well on fire protection in the past.</p> <ul style="list-style-type: none"> <li>• Investigation of PMDFCI (Municipal Forest Fire Protection, Municipal de Defesa da Floresta Contra Incêndios);</li> <li>• Visual inspection of the plot before harvesting;</li> <li>• Implementation of forest fire fighting measures according to law;</li> <li>• Best forest practices;</li> <li>• Monitoring performance.</li> </ul>
<b>2.6.1</b>	<b><i>Appropriate mechanisms are in place for resolving grievances and disputes, including those relating to tenure and use rights, to forest management practices and to work conditions.</i></b>
<b>Mitigation measures</b>	<p>BSL takes seriously any complaint of any person or organisation considering harvesting operations. This also improves performance on respecting local interests. The aim is to track down and solve grievances and disputes before the harvesting operations commence. The feedstock suppliers are required to pro-actively implement a complaint procedure and keep records (which are checked).</p> <p>Such mechanisms play an important function as a safety net for sufficient performance on social and cultural aspects of Sustainable Forest Management and in complying with other indicators of SBP standard 1.</p> <ul style="list-style-type: none"> <li>• The aim is to solve grievances and disputes before the harvesting operations commence (or not to buy from the disputed plots).</li> <li>• BSL makes clear to employees and stakeholders that any complaint or comment related to feedstock supply is taken very seriously, to ensure sufficient performance on legality and social aspects of Sustainable Forest Management.</li> </ul>

	<ul style="list-style-type: none"> <li>• BSL has a complaint procedure and keeps complaint records of any stakeholder. The feedstock suppliers are also required (signed supplier declaration) to actively implement a complaint procedure and keep records.</li> <li>• BSL monitors the harvesting operations of its feedstock suppliers and checks their records on Complaints and Comments. Pro-active interviews/contacts with relevant stakeholders, such as land owners on submitted comments (orally and in writing), and assesses if complaints were dealt with properly.</li> <li>• The results of the inspections/contacts are of direct importance to the 'SBE program approved' status of feedstock suppliers.</li> </ul>
<b>2.8.1</b>	<b><i>The Biomass Producer has implemented appropriate control systems and procedures for verifying that appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12).</i></b>
<b>Mitigation measures</b>	<p>BSL has a control system and adequate procedures on the health and safety of forest workers.</p> <p>BSL demands the same from its feedstock suppliers and checks the health safety of harvesting personnel during its monitoring (administrative and field) inspections.</p> <ul style="list-style-type: none"> <li>• Supplier qualification process and inspections of the supplier's administration: <ul style="list-style-type: none"> <li>○ Insurances and aptitude forms;</li> <li>○ Social Security;</li> <li>○ Present workforce and training (new) personnel;</li> <li>○ Health and safety procedures;</li> <li>○ Training records and hiring of specialists;</li> <li>○ Records of Personal Protection Equipment (PPE) distribution;</li> <li>○ Records of machinery safety tools and equipment on documental register;</li> <li>○ Medical record for employment.</li> </ul> </li> <li>• Field inspection supplier: <ul style="list-style-type: none"> <li>○ Protective equipment use;</li> <li>○ Medical kit;</li> <li>○ Fire extinguisher;</li> <li>○ Respect of safety distances;</li> </ul> </li> <li>• Level of knowledge of personnel.</li> </ul>
<b>2.9.1</b>	<b><i>Feedstock is not sourced from areas that had high carbon stocks in January 2008 and no longer have those high carbon stocks.</i></b>
<b>Mitigation measures</b>	<p>The approach to mitigating this risk:</p> <ul style="list-style-type: none"> <li>• Wood from forests converted to plantations, as also wood lands that are converted to non-forest use, in line with principle 4 of FSC Controlled Wood, are not considered SBP compliant.</li> <li>• Feedstock coming from riparian vegetation are not considered SBP compliant</li> </ul>

## 9.2 Monitoring and outcomes

With the implementation of the SBP, BSL reinforces its commitment with its principles, while adopting a performance model based on structured procedures for systematic implementation.

Under this framework, the current procedures provide practices that make it possible to evaluate, at regular intervals, the results of the SBP. That means, whether it maintains an adequate level of performance and in accordance with the current Standards and requirements.

BSL uses the information collected from monitoring (through field actions, including audits) to verify that it is achieving the expected results, including the improving of its internal and external performance, the degree of compliance with legal, normative and others obligations needed for reaching the objectives defined by SBP.

The monitoring and measurement actions related with the scope of the SBP include:

- Document and other available information analysis,
- Analysis of the records and other information associated with the control of origin, legality and other SBP compliance requirements / criteria applicable to the control of the raw material supply base;
- Visits / contacts, with relevant stakeholders;
- Training and Information:
- Audits,
- Treatment of Non-Conformities, Complaints or other Concerns of Stakeholders, including internal follow-up actions and with their subcontractors and suppliers.
- Analysis and review of results and decision making, based on the information resulting from the monitoring and measurement carried out, as well as regarding any changes, with an impact on the SBP, ensuring that they are identified, their consequence is determined in the achievement of the desired results and,
- Changes are planned in order to mitigate negative effects on the intended results.

The anticipation to situations with the potential to generate non-compliance, will result from proactive monitoring by the entire BSL structure and the creation and development of cooperative relationships with its suppliers and business partners.

# 10 Detailed Findings for Indicators

Detailed findings for each Indicator are given in Annex 1.

# 11 Review of Report

## 11.1 Peer review

The report has taken into consideration the drafts of the SBP NRA for Portugal and was sent to a large number of stakeholder, who are experts in different related fields. Therefore, a peer review was not necessary.

## 11.2 Public or additional reviews

The SBR and SBE were sent to a large group of stakeholders for review (more information in Chapter 6). The SBR and SBE are always available at the SBP web site and BSL web site. Any interested party can contact Cecilia Nolasco by mail [coc@bsl.pt](mailto:coc@bsl.pt) to provide its comment, which will be obligatory taken into consideration



## 12 Approval of Report

Approval of Supply Base Report by senior management			
Report Prepared by:	<i>Cecília Nolasco</i> <i>Pedro Rodrigues</i>	<i>Chain of Custody Team</i>	<i>24/07/2020</i>
	Name	Title	Date
The undersigned persons confirm that I/we are members of the organization'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 finalization of the report.			
Report approved by:	José Reis Jaime Reis	Administrators	24/07/2020
	Name	Title	Date

# 13 Updates

## 13.1 Significant changes in the Supply Base

Not applicable.

## 13.2 Effectiveness of previous mitigation measures

In the development process of the SBE, additions have been made to BSL's procedures and evaluation tools. The measures were tested in practise. They proved to be effective.

## 13.3 New risk ratings and mitigation measures

Not applicable.

## 13.4 Actual figures for feedstock over the previous 12 months

Based on the historical data, in Port of Aveiro it will be in the range 0 - 200,000 tons (25,820.18 Tons of primary raw material - 2019).

## 13.5 Projected figures for feedstock over the next 12 months

Regarding the projection of the feedstock for the current year, and based on the expected evolution and historical data of wood sales from Port of Aveiro, it will be in the range 0 - 200,000 tons, (with an estimated annual average value from 25,000 to 50,000 tonnes)

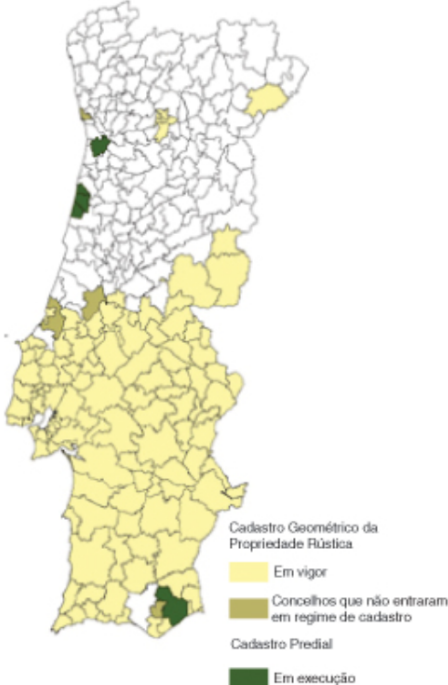
# Annex 1: Detailed Findings for Supply Base Evaluation Indicators

	Indicator
1.1.1	The Biomass Producer's Supply Base is defined and mapped.
Finding	The SBE scope is 'Portugal', there are no issues related to the defining and mapping of the supply base. Despite the incomplete geometric cadastre of the rural real state, 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 (country, village) serves as definition of the source which enables, supported on maps available, the mapping of the supply base. On the above background, this risk is evaluated to be low.
Means of Verification	<ul style="list-style-type: none"> <li>• Delivery notes, felling manifests, invoices, among other legal documents;</li> <li>• The scope is defined and justified;</li> <li>• Maps to the appropriate scale are available;</li> <li>• Key personnel interviews.</li> </ul>
Evidence Reviewed	<ul style="list-style-type: none"> <li>• Delivery notes, felling manifests, invoices, among other legal documents.</li> <li>• National Forestry Strategy (RCM n.º 6-B/2015 - Diário da República n.º 24/2015, 1º Suplemento, Série I de 2015-02-04); ICNF portal (<a href="http://www.icnf.pt/portal/icnf/docref/enf">http://www.icnf.pt/portal/icnf/docref/enf</a>)</li> <li>• National Forestall Inventories IFN5 (FloreStat_IFN5); ICNF portal (<a href="http://www.icnf.pt/portal/florestas/ifn/ifn5/rel-fin">http://www.icnf.pt/portal/florestas/ifn/ifn5/rel-fin</a>)</li> <li>• National Forestall Inventories IFN6, preliminary results (IFN6 – Preliminary Results preliminares.pdf); ICNF portal (<a href="http://www.icnf.pt/portal/florestas/ifn/ifn6">http://www.icnf.pt/portal/florestas/ifn/ifn6</a>)</li> <li>• Agricultural Statistics 2015.xls, INE</li> <li>• (<a href="https://www.ine.pt/xportal/xmain?xpid=INE&amp;xpgid=ine_publicacoes&amp;PUBLICACOESpub_boui=271434407&amp;PUBLICACOESmodo=2">https://www.ine.pt/xportal/xmain?xpid=INE&amp;xpgid=ine_publicacoes&amp;PUBLICACOESpub_boui=271434407&amp;PUBLICACOESmodo=2</a>)</li> <li>• Decree-law 16-2009 planos gestão florestal (<a href="https://dre.pt/application/dir/pdf1sdip/2009/01/00900/0026800273.pdf">https://dre.pt/application/dir/pdf1sdip/2009/01/00900/0026800273.pdf</a>);</li> <li>• ICNF portal (<a href="http://www.icnf.pt/portal/icnf/legisl/legislacao/2009/decreto-lei-n.o-16-2009-de-14-de-janeiro.-d.r.-n.o-9-serie-i">http://www.icnf.pt/portal/icnf/legisl/legislacao/2009/decreto-lei-n.o-16-2009-de-14-de-janeiro.-d.r.-n.o-9-serie-i</a>)</li> <li>• Technical Standards Forest Management Plans (<a href="http://www.icnf.pt/portal/florestas/gf/pgf/resource/doc/manual/normas-tecn-PGF-AFN.pdf">http://www.icnf.pt/portal/florestas/gf/pgf/resource/doc/manual/normas-tecn-PGF-AFN.pdf</a>)</li> </ul>
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
1.1.2	Feedstock can be traced back to the defined Supply Base.
Finding	<p>Because of the incomplete geometric cadastre of the rural real-state, BSL uses other options to identify the origin of wood. BSL purchases wood from private forests, with two options to trace the origin of wood:</p> <ul style="list-style-type: none"> <li>• Forest operations under the umbrella of a Management Plan, that identifies the work areas, or</li> <li>• Without a Forest Management Plan: <ul style="list-style-type: none"> <li>○ For conifers: <ul style="list-style-type: none"> <li>▪ Copy of “Manifesto de Corte” (phytosanitary manifest obligatory for all pine deliveries, and submitted to forest authorities (ICNF) before the felling operation) with information of: <ul style="list-style-type: none"> <li>• Species</li> <li>• Volume</li> <li>• Origin of wood to the level of village or “freguesia” (parish)</li> </ul> </li> <li>▪ Invoices, waybills, transport/shipping documents indicating the origin of the forest exploration</li> </ul> </li> <li>○ For other species: Invoices, waybills, transport/shipping documents indicating the origin of the forest exploration. According DL 31/2020 of 30<sup>th</sup> June will also be applied to other species the “Manifesto de Corte” (phytosanitary manifest obligatory for all pine deliveries and submitted to forest authorities (ICNF) before the felling operations. This decree-law comes into force within 180 days from the date of its publication.</li> <li>• Simultaneously, approval documentation is required for specific operations on cork and holm Oak including cutting and pruning, Holly cutting, and also premature cuttings of Eucalyptus, Pinus pinaster or riparian vegetation.</li> </ul> </li> </ul> <p>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].</p> <p>There are systems in place to trace the feedstock primary origin back to the forest stand but it is possible to do so if there are elements in the manifests or transportation documents, which could be used in the cadastral system (as the article number and section) or geographic coordinates in areas without cadastral system.</p> <p>BSL records the origin of each input up to the level of village or “freguesia” (parish), which is considered enough to demonstrate that it's in line with the Supply Base.</p> <p>Portugal presents a low corruption perception Index (64). There is a high level of law enforcement and surveillance for manifests, invoices and transport documents which are considered reliable sources of information.</p> <p>On the above background, the risk related to the traceability of feedstock back to the supply base is evaluated to be low.</p>
Means of Verification	<ul style="list-style-type: none"> <li>• Felling phytosanitary manifest includes identification of the origin of the felling. Also documentation for transportation identifies the origin of the transport which could be useful in case of direct transport.</li> <li>• The transport documents state: the name and address of the operator and the sender or receiver, the name and quantity/volume of the shipped product, the place of provenience of the raw material and the date of the shipment.</li> <li>• 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. Feedstock inputs, including species and volumes, are consistent with the defined Supply Base.</li> </ul>

	<ul style="list-style-type: none"> <li>• Transport documentation and goods-in records are consistent with the defined scope of the SBE.</li> </ul>
Evidence Reviewed	<ul style="list-style-type: none"> <li>• Delivery notes, felling manifests, invoices, among other legal documents.</li> <li>• National Forestry Strategy (RCM n.º 6-B/2015 - Diário da República n.º 24/2015, 1º Suplemento, Série I de 2015-02-04);</li> <li>• ICNF portal (<a href="http://www.icnf.pt/portal/icnf/docref/enf">http://www.icnf.pt/portal/icnf/docref/enf</a> )</li> <li>• Environment statistics 2018, INE (<a href="https://www.ine.pt/xportal/xmain?xpid=INE&amp;xpgid=ine_publicacoes&amp;PUBLICACOE_Spub_boui=358631361&amp;PUBLICACOESmodo=2">https://www.ine.pt/xportal/xmain?xpid=INE&amp;xpgid=ine_publicacoes&amp;PUBLICACOE_Spub_boui=358631361&amp;PUBLICACOESmodo=2</a>)</li> <li>• Estatísticas Agrícolas 2018 (<a href="https://www.ine.pt/xportal/xmain?xpid=INE&amp;xpgid=ine_publicacoes&amp;PUBLICACOE_Spub_boui=358629204&amp;PUBLICACOESstema=55505&amp;PUBLICACOESmodo=2">https://www.ine.pt/xportal/xmain?xpid=INE&amp;xpgid=ine_publicacoes&amp;PUBLICACOE_Spub_boui=358629204&amp;PUBLICACOESstema=55505&amp;PUBLICACOESmodo=2</a>)</li> <li>• Boletim-Estatístico-da-Celpe-de-2014 (<a href="http://www.celpe.pt/wp-content/uploads/2016/09/Boletim_WEB_2015.pdf">http://www.celpe.pt/wp-content/uploads/2016/09/Boletim_WEB_2015.pdf</a> )</li> <li>• Relatório-de-Characterização-da-Fileira-Florestal-2014 (<a href="http://www.aiff.org.pt/assets/Relatorio-de-Characterizacao-da-Fileira-Florestal-2014-160p-CAPA-3-spread....pdf">http://www.aiff.org.pt/assets/Relatorio-de-Characterizacao-da-Fileira-Florestal-2014-160p-CAPA-3-spread....pdf</a>)</li> <li>• Cutting Permission in Law n.º 33/96, at 17/08 (article 7th)</li> <li>• <a href="https://dre.pt/application/dir/pdf1sdip/1996/08/190A00/25682573.pdf">https://dre.pt/application/dir/pdf1sdip/1996/08/190A00/25682573.pdf</a></li> <li>• Fileira Pinho: challenges and opportunities (centro PINUS_ JoaoGonçalves dados fileira pinho 2014.pdf); Centro Pinus (<a href="http://www.centropinus.org/index.php?lingua=1">http://www.centropinus.org/index.php?lingua=1</a>)</li> <li>• Decree-law 123-2015 nem a todo do Pinheiro ICNF portal (<a href="https://dre.pt/application/file/67649256">https://dre.pt/application/file/67649256</a>); (<a href="http://www.icnf.pt/portal/florestas/prag-doe/ag-bn/nmp">http://www.icnf.pt/portal/florestas/prag-doe/ag-bn/nmp</a> )</li> <li>• Declaração Retificação n.º 38/2015 de 01/09 do Decreto lei 123-2015 nematodo do Pinheiro (<a href="https://dre.pt/application/file/70144398">https://dre.pt/application/file/70144398</a> )</li> <li>• Decree-law 174-1988 manifesto corte (<a href="https://dre.pt/application/file/374768">https://dre.pt/application/file/374768</a>); ICNF portal (<a href="http://www.icnf.pt/portal/icnf/serv/formularios/manif/man-cort-arr-arvor">http://www.icnf.pt/portal/icnf/serv/formularios/manif/man-cort-arr-arvor</a> )</li> <li>• Registo de Operador de Madeira e Derivados ICNF portal (<a href="http://www.icnf.pt/portal/florestas/fileiras/reg-op">http://www.icnf.pt/portal/florestas/fileiras/reg-op</a> )</li> <li>• Decree-law 198/2012 de 24/08 FATURAS E OUTROS DOCUMENTOS COM RELEVÂNCIA FISCAL (<a href="http://info.portaldasfinancas.gov.pt/NR/rdonlyres/907FD2F4-9A9C-485D-8A99-FD164BF9FCEC/0/Decreto-Lei%20n%20_198_2012_24_08.pdf">http://info.portaldasfinancas.gov.pt/NR/rdonlyres/907FD2F4-9A9C-485D-8A99-FD164BF9FCEC/0/Decreto-Lei%20n%20_198_2012_24_08.pdf</a> )</li> <li>• Decree-law nº 31/2020, de 30 de Junho - Approves the regime of the cutting manifest, extraordinary cutting, thinning or uprooting trees and the traceability of the woody material</li> </ul>
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
1.1.3	The feedstock input profile is described and categorised by the mix of inputs.
Finding	BSL's supply chain is 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 easy to record.  In this case, the risk for this indicator has been assessed as Low.
Means of Verification	<ul style="list-style-type: none"> <li>• Felling manifest</li> <li>• Purchase invoices</li> <li>• Transport/shipping documents</li> <li>• Waybills</li> <li>• Internal records with information about the origin, species and supplier</li> <li>• Visual inspection</li> </ul>
Evidence Reviewed	<ul style="list-style-type: none"> <li>• National Forestry Strategy (<a href="https://dre.pt/application/file/66432612">https://dre.pt/application/file/66432612</a>);</li> <li>• ICNF portal (<a href="http://www.icnf.pt/portal/icnf/docref/enf">http://www.icnf.pt/portal/icnf/docref/enf</a>)</li> <li>• National Forest Inventory IFN6, preliminary results (IFN6 - Results Preliminares.pdf); ICNF portal Decreto-Lei 174-1988 manifesto corte (<a href="https://dre.pt/application/file/374768">https://dre.pt/application/file/374768</a>); ICNF portal(<a href="http://www.icnf.pt/portal/icnf/serv/formularios/manif/man-cort-arr-arvor">http://www.icnf.pt/portal/icnf/serv/formularios/manif/man-cort-arr-arvor</a>)</li> <li>• Decree-Law 198/2012 de 24/08 FATURAS E OUTROS DOCUMENTOS COM RELEVÂNCIA FISCAL (<a href="http://info.portaldasfinancas.gov.pt/NR/rdonlyres/907FD2F4-9A9C-485D-8A99-FD164BF9FCEC/0/Decree-law%20n%20_198_2012_24_08.pdf">http://info.portaldasfinancas.gov.pt/NR/rdonlyres/907FD2F4-9A9C-485D-8A99-FD164BF9FCEC/0/Decree-law%20n%20_198_2012_24_08.pdf</a>)</li> <li>• Decree-Law nº 31/2020, de 30 de Junho - Approves the regime of the cutting manifest, extraordinary cutting, thinning or uprooting trees and the traceability of the woody material</li> </ul>
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
1.2.1	The Biomass Producer has implemented appropriate control systems and procedures to ensure that legality of ownership and land use can be demonstrated for the Supply Base.
Finding	<p>In Portugal, around 97% of forest land is private (including land owned by individuals, communities and corporations). Forest land tenure is based on one document (Description of the Land Registry) but several documents are used on the ground level as transitory or incomplete evidence, as the Description on the Land Registry is not updated for all lands. There are, however, regions (53% of territory) where there is a geometric cadastral survey of rural lands (<i>Cadastrre Geometric da Propriedade Rustic</i>) and so there is consistency between spatial and numeric information (DL 172/95) held by tax offices (Land Registry and Finance Division). In regions where there is no rural geometric cadastral (47% of the territory), the land tenure documents are based only on descriptions of boundaries and communications with neighbours. Land use rights and management practices are covered and need to be deemed low risk before the Manifest document is issued to allow forest harvesting. Despite the difficulties and complexities concerning land tenure and management rights (mainly due to the absence of geometric information), no significant disputes about the issue were found in practise. Based on BSL's experience, there are no records of disputes or other conflicts related to the ownership or right of the land use. Next to a lack of cadastral data on 47% of all lands, and the difficult situation of many landowners with small parcels in Portugal, for practical reasons landowners sometimes sell or transfer (inherit) parts of their property without registering the change to the government, because of the complexity. Therefor there are discrepancies between registered and actual ownership rights. Wood lands can also be impounded by the government (if the landowner has debts).</p> <p style="text-align: center;"><b>Situação Cadastral - Portugal Continental</b></p>  <p>Portugal presents a low corruption perception Index (64). There is a high level of law enforcement and surveillance for manifests, invoices and transport documents which are considered reliable sources of information. Considering forestry in the north of Portugal, the fact that there are little disputes / complaints does not guarantee the wood is legal / the seller is indeed the owner of all the plots harvested. For example, areas can become ownerless and abandoned and some could try to take advantage of the situation before the land is impounded by the government.</p>

	Based on the available information, the risk for this indicator has been assessed as Specified Risk.
Means of Verification	<ul style="list-style-type: none"> <li>• Availability of the register (cadastrres): <a href="http://www.dgterritorio.pt/cadastrro/cadastrro_geometrico_da_propriedade_rustica_cgpr_consultar_seccoes_cadastrais/">http://www.dgterritorio.pt/cadastrro/cadastrro_geometrico_da_propriedade_rustica_cgpr_consultar_seccoes_cadastrais/</a></li> <li>• Description on the Land Registry (Descrição na Conservatória do Registo Predial)</li> <li>• Content certificate matrix article of tax office (Certidão de teor do artigo de Matriz da repartição de finanças) &amp; land notebook (Caderneta predial) is the fiscal document which confirms taxes payment.</li> <li>• Judicial final and unappealable decision (Sentença judicial transitada em julgado).</li> <li>• Notarial deed (Escritura notarial).</li> <li>• Forest Renting/leasing contract (Contrato de Arrendamento Florestal)</li> <li>• For Collective or Comercial entities the extract from the commercial register (Certidão do Registo Comercial) to prove the specific responsibilities of owners/managers/presidents</li> </ul>
Evidence Reviewed	<ul style="list-style-type: none"> <li>• Government sources:</li> <li>• Constitution (Constituição da República Portuguesa): <a href="http://www.parlamento.pt/Legislacao/Documents/constpt2005.pdf">http://www.parlamento.pt/Legislacao/Documents/constpt2005.pdf</a></li> <li>• Cadastre at Direção Geral do Território: <a href="http://www.dgterritorio.pt/cadastrro/cadastrro_geometrico_da_propriedade_rustica_cgpr_consultar_seccoes_cadastrais/">http://www.dgterritorio.pt/cadastrro/cadastrro_geometrico_da_propriedade_rustica_cgpr_consultar_seccoes_cadastrais/</a></li> <li>• Non-Government sources:</li> <li>• Transparency International's Corruption Perception Index 2014 at Transparency International -The global coalition against corruption: <a href="https://www.transparency.org/cpi2015/results">https://www.transparency.org/cpi2015/results</a></li> <li>• Worldwide Governance Indicators Report at World bank: <a href="http://info.worldbank.org/governance/wgi/index.aspx#reports">http://info.worldbank.org/governance/wgi/index.aspx#reports</a></li> <li>• 'O cadastro e a propriedade rustica em Portugal'; Fundação Francisco Manuel dos Santos e Rodrigo Sarmiento de Beires, May/2013 (<a href="https://www.ffms.pt/upload/docs/o-cadastro-e-apropriade-rustica-em-portugal_ypUM5ASBAUmUpHUIgJtp0A.pdf">https://www.ffms.pt/upload/docs/o-cadastro-e-apropriade-rustica-em-portugal_ypUM5ASBAUmUpHUIgJtp0A.pdf</a>)</li> <li>• 'Cadastro a prédios rústicos e urbanos em Portugal custaria 700 ME'; Lusa-Última hora 27/03/2014 in Revista Visão:(<a href="http://visao.sapo.pt/lusa/cadastro-a-predios-rusticos-e-urbanos-em-portugal-custaria-700-me=f774740">http://visao.sapo.pt/lusa/cadastro-a-predios-rusticos-e-urbanos-em-portugal-custaria-700-me=f774740</a>)</li> <li>• Decreto-Lei nº 31/2020, de 30 de Junho - Aprova o regime do manifesto de corte, corte extraordinário, desbaste ou arranque de árvores e da rastreabilidade do material lenhoso</li> </ul>
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	<p>BSL does not buy any wood from unknown sources and wood suppliers without a valid company registration, nor from wood lands of which the owner rights are disputed. BSL does not get involved in issues that must be settled by the suppliers (loggers and forest owners). However, any eventual dispute, concerning the ownership of the wood, needs to be solved first.</p> <p>When starting business relationship with the owner or a wood supplier, BSL investigates if cadastre data are available and if not, additional investigations are conducted by means of legal document research and extends to, for example, interviewing/contacts local stakeholders (owners of neighboring wood lands) and local authorities, whenever:</p> <ul style="list-style-type: none"> <li>• Cadastral data are unavailable.</li> <li>• There are complaints about the land owner, or the harvest operation.</li> </ul> <p>If Cadastral data are unavailable, or if there are complaints about the land owner, or the harvest operation, these mitigation measures are executed:</p> <ul style="list-style-type: none"> <li>• Identification of the plot / area;</li> <li>• Identification of the owner;</li> <li>• Proof of the relationship between the seller and the land in question;</li> <li>• Formalization of the business through a purchase and sale agreement;</li> </ul>



	<p>If there is still doubts about the ownership of the land, interviews with stakeholders and field visits are conducted to collect all information. If ownership cannot be confirmed the wood cannot be purchased or be accepted as SBP compliant.</p> <p>From 01 January 2021, the Manifest document will be used as a evidence of fulfilment of this indicator.</p>
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	Indicator
1.3.1	<p>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.</p>
Finding	<p>Regulation (EU) No 995/2010 (RUEM), of 20 October, entered into force in March 2013, and Decree-Law no. 76/2013, for its application in Portugal, was published on 5th of June of the same year.</p> <p>Within the framework of the EUTR, two types of agents are defined:</p> <ul style="list-style-type: none"> <li>• Operator, understood as any singular or collective person who places on the market wood or wood products, and</li> <li>• 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.</li> </ul> <p>BSL is registered as operator with code 396. BSL have a due diligence system in place for each wood/timber acquisition, which includes procedures that ensures the access to information, risk assessment and risk mitigation measures recommended. This information must be kept and be provided to competent authorities upon request. And when BSL is working as a trader, asks to its suppliers for their registration as Operator.</p> <p>Before the implementation of DL 31/2020 of 30<sup>th</sup> June. No permit is required for logging activities, including normal commercial silvicultural harvesting, final cuts and others. Only a harvesting written notice (manifesto) is obligatory for timber and cork, submitted to forest authorities (ICNF) up to 30 days after the felling/extraction operation.</p> <p>A National Action Plan for Control of Pine Wilt Disease (NMP in PT) <i>Bursaphelenchus xylophilus</i> and its vector insect <i>Monochamus galloprovincialis</i> is in place. This mostly focuses in our case is <i>Pinus pinaster</i> (23% of all forest areas) but applies to all other host conifers (<i>Abies spp.</i>, <i>Cedrus spp.</i>, <i>Larix spp.</i>, <i>Picea spp.</i>, <i>Pinus spp.</i>, <i>Pseudotsuga spp.</i>, <i>Tsuga spp.</i>) – with these species covering 8% of forests. For these species there is obligation of previous communication of any felling and/or transportation of wood affected by pest. This documentation (phytosanitary manifest) also must accompany material until the arrival to industrial processing facilities. According DL 31/2020 of 30<sup>th</sup> June will also be applied to all species the “Manifesto de Corte” before any felling operations. This decree-law comes into force within 180 days from the date of its publication (January 2021)</p> <p>To start any operations in the forest, the document named Manifest is filled out and submitted to Direcção Geral dos Recursos Florestais (General Management of Forest Resources). For all species, BSL receives documents on every transport that takes place in the chain. The transport documents state: the name and address of the operator and the sender or receiver, the name and quantity/volume of the shipped product, the type of feedstock delivered, an indication of the tree species, the place of provenance of the raw material and the date of the shipment. The person responsible for the purchase of the raw material is constantly accompanying the loggers and ensuring these issues.</p> <p>The Competent Authority in Portugal for ensuring implementation of the EUTR is Institute for Nature Conservation and Forests (ICNF). The enforcement authority is the National Republican Guard (GNR) which conducts enforcement according to ICNF procedures. According to the ICNF, there was no infraction from 2013-2019 related with EUTR requirements.</p> <p>Based on the available information, the risk for this indicator has been assessed as Low.</p>
Means of Verification	<ul style="list-style-type: none"> <li>• EUTR Operator Registry of BSL and suppliers</li> <li>• Internal records with information about the origin, species, supplier</li> </ul>

	<ul style="list-style-type: none"> <li>• Manifest</li> <li>• Due Diligence System</li> </ul>
Evidence Reviewed	<p><b>Timber Operator Registry:</b></p> <ul style="list-style-type: none"> <li>• DL nº76/2013 de 5/06 art's 3º,8º at</li> <li>• <a href="https://dre.pt/application/dir/pdf1sdip/2013/06/10800/0322203225.pdf">https://dre.pt/application/dir/pdf1sdip/2013/06/10800/0322203225.pdf</a></li> <li>• (UE)Regulation n.º 995/2010 art's 4º, 5º, 6º <a href="http://www.icnf.pt/portal/florestas/fileiras/resource/docs/reg/regulamento-995-2010">http://www.icnf.pt/portal/florestas/fileiras/resource/docs/reg/regulamento-995-2010</a></li> <li>• Instituto da Conservação da Natureza e Florestas at page <a href="http://www.icnf.pt/portal/florestas/fileiras/reg-op">http://www.icnf.pt/portal/florestas/fileiras/reg-op</a></li> </ul> <p><b>Government sources</b></p> <ul style="list-style-type: none"> <li>• APA-Agência Portuguesa de Ambiente at <a href="http://apambiente.pt/index.php">http://apambiente.pt/index.php</a>;</li> <li>• SEPNA-Serviço da Protecção da Natureza e do Ambiente/GNR- Guarda Nacional Republicana at ( <a href="https://www.gnr.pt/Cons_NA_Defesa_Floresta_Contra_incencios.aspx">https://www.gnr.pt/Cons_NA_Defesa_Floresta_Contra_incencios.aspx</a>);</li> <li>• ICNF Report: (<a href="http://www2.icnf.pt/portal/florestas/fileiras/resource/doc/reg/RUEM-Relatorio-junho2019.pdf">http://www2.icnf.pt/portal/florestas/fileiras/resource/doc/reg/RUEM-Relatorio-junho2019.pdf</a>)</li> <li>• Decreto-Lei nº 31/2020, de 30 de Junho - Aprova o regime do manifesto de corte, corte extraordinário, desbaste ou arranque de árvores e da rastreabilidade do material lenhoso</li> </ul> <p><b>Non-Government sources</b></p> <ul style="list-style-type: none"> <li>• ANEFA - Associação Nacional de Empresas Florestais, Agrícolas e do Ambiente at: <a href="http://www.anefa.pt/AIMMP">http://www.anefa.pt/AIMMP</a></li> <li>• Associação das Indústrias de Madeira e Mobiliário de Portugal at: <a href="http://aimmp.pt/">http://aimmp.pt/</a></li> </ul>
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
1.4.1	The Biomass Producer has implemented appropriate control systems and procedures to verify that payments for harvest rights and timber, including duties, relevant royalties and taxes related to timber harvesting, are complete and up to date.
Finding	<p>There are no specific taxes related with wood exploration, except the fees and taxes applicable for all economic activities such as value added taxes (VAT) and income taxes (IRC or IRS) or the the Municipal Property Tax (IMI) in relation to rustic buildings that is fixed as a percentage of the Tax Asset Value (VPT).</p> <p>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.).</p> <p>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 farmer or forester.</p> <p>The payment of taxes to the Tax Authorities relating to the purchase of source material is credited through:</p> <ul style="list-style-type: none"> <li>• invoice for the purchase of raw material required for the feedstock or the work carried out (bearing in mind that many times self-billing is applied, so it is the purchasing company itself that issues the invoice)</li> <li>• certificate of being up to date with payments to the Tax Authorities (of the state and the autonomous community) of the company that has purchased the material or carried out the work.</li> </ul> <p>According to the available information, this indicator is classified as low risk. This conclusion is in line with the FSC National Risk Assessment for Portugal (indicators 1.6 and 1.7)</p>
Means of Verification	<ul style="list-style-type: none"> <li>• Valid invoice/receipts</li> <li>• Certificate of being up to date with payments to the Tax Authorities, of the state and the autonomous community</li> <li>• IES_ Annual Declaration</li> <li>• Proof of Annual declaration IRS/IRC</li> <li>• Taxes Single Report</li> </ul>
Evidence Reviewed	<p>VAT Code CIVA:</p> <ul style="list-style-type: none"> <li>• DL n.º 102/2008, de 20/6: artº2º 1-a);artº9º 32) List I nº4. Anexo A- IV</li> </ul> <p>Individual Income Code to Singular Persons:</p> <ul style="list-style-type: none"> <li>• 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</li> </ul> <p>Commercial Income Code to collective entities</p> <ul style="list-style-type: none"> <li>• DLnº 442-B/88 Updated by Law n.º 2/2014 de 16/12, Law nº3/2014 de 16/12 &amp; Law nº4/2014 de 16/12 artº1º, artº2º, artº 3º, artº18º-nº7 ; artº20º nº1 g) artº23º nº2 k)</li> <li>• Port. nº 55/2010 21/01 artº2º</li> </ul> <p>Government sources</p> <ul style="list-style-type: none"> <li>• Autoridade Tributária e Aduaneira at: <a href="https://www.portaldasfinancas.gov.pt/pt/home.action">https://www.portaldasfinancas.gov.pt/pt/home.action</a></li> <li>• Autoridade Tributária e Aduaneira: VAT Exemption and reduction at:<a href="http://info.portaldasfinancas.gov.pt/NR/rdonlyres/9A86386D-7EB8-447F-9EAC-CEB67C206BD2/0/INFORMA%C3%87%C3%83O.3526.pdf">http://info.portaldasfinancas.gov.pt/NR/rdonlyres/9A86386D-7EB8-447F-9EAC-CEB67C206BD2/0/INFORMA%C3%87%C3%83O.3526.pdf</a></li> <li>• Autoridade Tributária e Aduaneira: Self invoicing by the buyer: <a href="http://info.portaldasfinancas.gov.pt/NR/rdonlyres/A4FB3349-0071-47FC-97EC-ADE2061C094A/0/Informacao_5332.pdf">http://info.portaldasfinancas.gov.pt/NR/rdonlyres/A4FB3349-0071-47FC-97EC-ADE2061C094A/0/Informacao_5332.pdf</a></li> </ul> <p>Non-Government sources</p>

	<ul style="list-style-type: none"> <li>• ANEFA - Associação Nacional de Empresas Florestais, Agrícolas e do Ambiente at: <a href="http://www.anefa.pt/">http://www.anefa.pt/</a></li> <li>• AIMMP – Associação das Indústrias de Madeira e Mobiliário de Portugal at: <a href="http://aimmp.pt/">http://aimmp.pt/</a></li> <li>• AIFF – Associação para a Competitividade da Indústria da Fileira Florestal at: <a href="http://www.aiff.org.pt/">http://www.aiff.org.pt/</a></li> </ul>
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
<b>1.5.1</b>	The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is supplied in compliance with the requirements of CITES.
Finding	There are no CITES species included in the CITES in Portugal. Based on the available information, the risk for this indicator has been assessed as Low.
Means of Verification	<ul style="list-style-type: none"> <li>• List of purchased species</li> </ul>
Evidence Reviewed	<ul style="list-style-type: none"> <li>• Check list of CITES species: <a href="http://checklist.cites.org/#/en">http://checklist.cites.org/#/en</a></li> <li>• FSC National Risk Assessment for Portugal (FSC-NRA-PT V1.0) (indicator 1.20): <a href="https://fsc.org/en/document-centre/documents/resource/292">https://fsc.org/en/document-centre/documents/resource/292</a></li> </ul>
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
<b>1.6.1</b>	The Biomass Producer has implemented appropriate control systems and procedures to ensure that feedstock is not sourced from areas where there are violations of traditional or civil rights.
Finding	<p>There is no armed conflict in Portugal, nor is the Portuguese forestry sector associated with any conflict. Portugal is not subject to any UN sanction or ban on timber exports, and there are no persons or entities in the Portuguese forestry sector that are sanctioned by the UN.</p> <p>Portugal is well ranked in international reports:</p> <ul style="list-style-type: none"> <li>• Corruption Perceptions Index score of 64. The perception of the level of corruption has increased significantly in Portugal in recent years, although it remains clearly above 50, which implies a relatively low level of perception.</li> <li>• World Bank Governance Indicators (WGI), scores for 2018 between 89.52 and 78.85 (1-100 points). The WBI report has been produced in 200 countries since 1996 and covers the following governance indicators: i) Voice and Accountability, ii) Political Stability and Absence of Violence/Terrorism, iii) Government Effectiveness, iv) Regulatory Quality, v) Rule of Law, and vi) Control of Corruption.</li> </ul>

	<p>According to the reports from international organisations such as Amnesty International (see the 2017 report of Portugal) there are no serious concerns regarding civil rights related to the forestry sector. Portugal does not appear in any report from international organisations (Global Witness Chatham House Illegal Logging portal) regarding illegal timber trade or harvesting.</p> <p>There are no indigenous peoples in Portugal who can claim traditional use of lands, forests or other resources on the basis of customary rights or traditional uses. In Portugal there are many ancient customary rights linked to the forests of the Iberian Peninsula. There are no relevant conflicts related to these rights and where they exist there are established channels for their management and resolution. Many of these uses have died out due to disuse but are not exercised and others have been integrated into the management of the forests (public roads, firewood, communal management...).</p> <p>Labour rights are observed including those specified in the ILO fundamental principles. Portugal has ratified the 8 ILO Fundamental Conventions.</p> <p>According to the available information, this indicator is classified as low risk.</p>
Means of Verification	<ul style="list-style-type: none"> <li>• Purchase contracts</li> </ul>
Evidence Reviewed	<ul style="list-style-type: none"> <li>• FSC National Risk Assessment for Portugal (FSC-NRA-PT V1.0): <a href="https://fsc.org/en/document-centre/documents/resource/292">https://fsc.org/en/document-centre/documents/resource/292</a></li> <li>• WGI: <a href="http://info.worldbank.org/governance/WGI/#reports">http://info.worldbank.org/governance/WGI/#reports</a></li> <li>• Transparency international, corruption perception index: <a href="https://www.transparency.org/">https://www.transparency.org/</a></li> <li>• Amnesty International: <a href="https://www.amnesty.org/download/Documents/POL1067002018ENGLISH.PDF">https://www.amnesty.org/download/Documents/POL1067002018ENGLISH.PDF</a></li> <li>• Global Witness: <a href="https://www.globalwitness.org/en/">https://www.globalwitness.org/en/</a></li> </ul> <p><b>Labour Code:</b></p> <ul style="list-style-type: none"> <li>• Law n.º 7/09 12/02 cap I and updates like Lei 69/13, de 30/08 includes obligatory professional training (<a href="http://www.act.gov.pt/(ptPT)/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx">http://www.act.gov.pt/(ptPT)/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx</a>)</li> <li>• Republic Assembly Resolution nº109/2012 de 08/08 art 6º ( Convention 184 doesn't apply to industrial forest work)</li> <li>• ILO Convention numbers 87, 98, 29, 105, 100, 101,129 e 138, 184 (<a href="http://dre.pt/util/getpdf.asp?s=diad&amp;serie=1&amp;iddr=2012.153&amp;iddip=20121525">http://dre.pt/util/getpdf.asp?s=diad&amp;serie=1&amp;iddr=2012.153&amp;iddip=20121525</a>)</li> <li>• Foreign workers: Law n.º 23/2007 at 04/07 artº59º 5a) and updates (<a href="http://www.pgdlisboa.pt/leis/lei_mostra_articulado.php?nid=920&amp;tabela=leis&amp;so_milo">http://www.pgdlisboa.pt/leis/lei_mostra_articulado.php?nid=920&amp;tabela=leis&amp;so_milo</a>)</li> <li>• Labour Conditions Authority-ACT <a href="http://www.act.gov.pt/(pt-PT)/Paginas/default.aspx">http://www.act.gov.pt/(pt-PT)/Paginas/default.aspx</a>.</li> <li>• Ministry of Solidarity, Employment and Social Security <a href="http://www.portugal.gov.pt/pt/ministerios/mtsss.aspx">http://www.portugal.gov.pt/pt/ministerios/mtsss.aspx</a></li> <li>• Employment and Professional Training Institute at <a href="https://www.iefp.pt">https://www.iefp.pt</a></li> <li>• Ministry of Internal Administration <a href="http://www.portugal.gov.pt/pt/ministerios/mai/equipa.aspx">http://www.portugal.gov.pt/pt/ministerios/mai/equipa.aspx</a></li> <li>• Immigration And Borders Services <a href="http://www.sef.pt/portal/V10/EN/asp/page.aspx">http://www.sef.pt/portal/V10/EN/asp/page.aspx</a></li> <li>• SETAA-Sindicato da Agricultura, Alimentação e Florestas: at <a href="http://www.setaa.pt/">http://www.setaa.pt/</a></li> <li>• UGT-União Geral de Trabalhadores at <a href="https://www.ugt.pt/">https://www.ugt.pt/</a></li> <li>• CGTP - Confederação Geral de Trabalhadores Portugueses at <a href="http://www.cgtp.pt/">http://www.cgtp.pt/</a></li> <li>• ANEFA - Associação Nacional de Empresas Florestais, Agrícolas e do Ambiente at: <a href="http://www.anefa.pt/">http://www.anefa.pt/</a></li> <li>• UNAC - União da Floresta Mediterrânica <a href="http://www.unac.pt/">http://www.unac.pt/</a></li> <li>• Forum Florestal- Estrutura Federativa da Floresta Portuguesa at <a href="http://forumflorestal.pt">http://forumflorestal.pt</a></li> <li>• Forestis- Associação Florestal de Portugal <a href="http://www.forestis.pt/">http://www.forestis.pt/</a></li> <li>• FNAPF- Federação Nacional das Associações de Proprietários Florestais <a href="http://www.fnapf.pt/">http://www.fnapf.pt/</a></li> <li>• Confagri-Confederação Nacional das Cooperativas Agrícolas e do Crédito Agrícola de Portugal, CCRL at <a href="http://www.confagri.pt/">http://www.confagri.pt/</a></li> </ul>

	<ul style="list-style-type: none"> <li>• CNA - Confederação Nacional de Agricultura at <a href="http://www.cna.pt/">http://www.cna.pt/</a></li> <li>• CAP- Confederação dos Agricultores de Portugal <a href="http://www.cap.pt/">http://www.cap.pt/</a></li> <li>• BALADI- Federação Nacional dos Baldios <a href="https://www.facebook.com/Federa%C3%A7%C3%A3o-Nacional-dos-Baldios-257792997725879/">https://www.facebook.com/Federa%C3%A7%C3%A3o-Nacional-dos-Baldios-257792997725879/</a></li> </ul>
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
2.1.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that forests and other areas with high conservation values are identified and mapped.
Finding	<p>The important HCV areas critical to conservation are designated as protected and classified areas at national or EU level (Natura 2000), there are very likely a large number of smaller areas or biotopes important to biodiversity or as classified priority species and habitats could be unidentified.</p> <p><b>HCV 1 – Species diversity:</b> concentrations of biological diversity including endemic species, and rare, threatened, or endangered species that are significant at global, regional, or national levels.</p> <p>i) Classified areas: 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 Natura 2000 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. (<a href="http://www.icnf.pt/portal/naturaclas/cart">http://www.icnf.pt/portal/naturaclas/cart</a>).</p> <p>ii) Endangered species according to the classification adopted by the International Union for the Conservation of Nature (IUCN) to endangered species:</p> <ul style="list-style-type: none"> <li>• Critically endangered (CR)</li> <li>• Endangered (EN)</li> <li>• Vulnerable (VU).</li> <li>• Protected species within the legal conservation instruments in force in Portugal</li> </ul> <p>Relevant information:</p> <ul style="list-style-type: none"> <li>• Habitat and Birds Directives;</li> <li>• CITES</li> <li>• Bern Convention</li> <li>• Bonn Convention</li> <li>• Red Book of Vertebrates from Portugal</li> <li>• Red book and Atlas of Bryophytes</li> <li>• <a href="http://www.icnf.pt/portal/naturaclas/patrinatur/especies">http://www.icnf.pt/portal/naturaclas/patrinatur/especies</a></li> </ul> <p>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.</p>

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

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

- Autumnal bird migration corridors in south-west Alentejo and the Vicentina coast;
- Zones of concentration and passage for steppe birds (great and little bustards);
- Reproduction areas for birds of prey with threatened status;
- Concentration of winter birds in wetlands;
- Shelters for bats, considered important at a national, regional, and local level.

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

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 refuges

- i) Habitats Directive (2007-2012)  
Covers habitats listed in the Habitats Directive (Annex I) which, in the last national Habitats Directive report (2007–2012), were listed in categories (U1) – unfavourable inadequate – and (U2) – unfavourable bad.
- ii) Natura 2000 database  
Natura2000’s sectorial plan is the main source of information used to identify habitats in classified areas. In the case of non-classified areas, the Habitats Directive implementation reports can be consulted for information on habitat conservation (favourable, unfavourable inadequate, unfavourable bad).
- iii) Portugal approved its ratification of the Convention on Biological Diversity (CBD) via DL no. 21/93, dated 29 June, which became effective in our country on 21 March 1994. The Fifth National Report to CBD had as its main objective a review of implementation of the Convention and an assessment of how far we had come in achieving CBD objectives and the Aichi Biodiversity Targets contained in the Strategic Plan for Biodiversity 2011–2020. It also contributed to the development of the Global Biodiversity Outlook report and the review of the fulfilment of the EU Biodiversity Strategy for 2020. The report covers the state and tendencies of biodiversity and detected threats, reporting on actions taken towards fulfilling the Aichi Biodiversity Targets and finally sets out, based on experience, topics most deserving of attention in order to achieve a more adequate and broad-reaching implementation of the CBD’s COP (Conference of Parties) decisions in Portugal.

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

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

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

i) World Heritage (UNESCO)

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

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

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

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

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

National legislation that identifies and protects outstanding grove (arboreta) (<http://www.icnf.pt/portal/florestas/Arvores.gry?start:int=80&Distrito=&Concelho=&Freguesia=&Processo>).

The main source of information within this attribute is the application report of the Habitats Directive (2007-2012) as well as the description list of every habitat identified in the Annex 1 of Habitats Directive in Sectorial Plan of the Natura2000 network. Other cartographic information of HCV is included on open GIS like [http://www.habeas-med.org/webgis/pt\\_en/](http://www.habeas-med.org/webgis/pt_en/) and <http://epic-webgis-portugal.isa.ulisboa.pt>.

## Conclusion

### HCV 1 – Specified risk

The scope of RNAP and SNAC is the assessment of large areas with significant biodiversity values, meaning that the identification of threats and pressures to attributes, as well as monitoring activities are, typically, performed at a macro scale. The identification of precise HCV attributes might not fall under the scope of these assessments, so specified risk is considered. Outside SNAC and RNAP, where less information is available, the risk is, thereby, specified.

### HCV 2 – Low Risk

It is considered that these attributes are well identified and mapped.

### HCV 3 – Specified Risk

Extra effort is needed to identify and map these values. Internet sources, as well as the situation on the ground need to be studied.

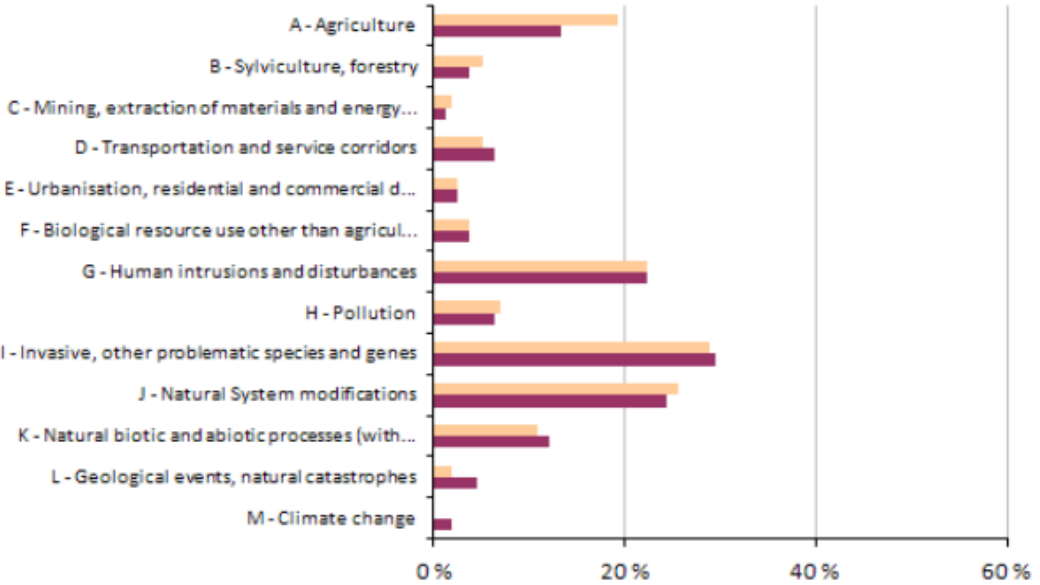
See indicator 2.1.2. and 2.2.3

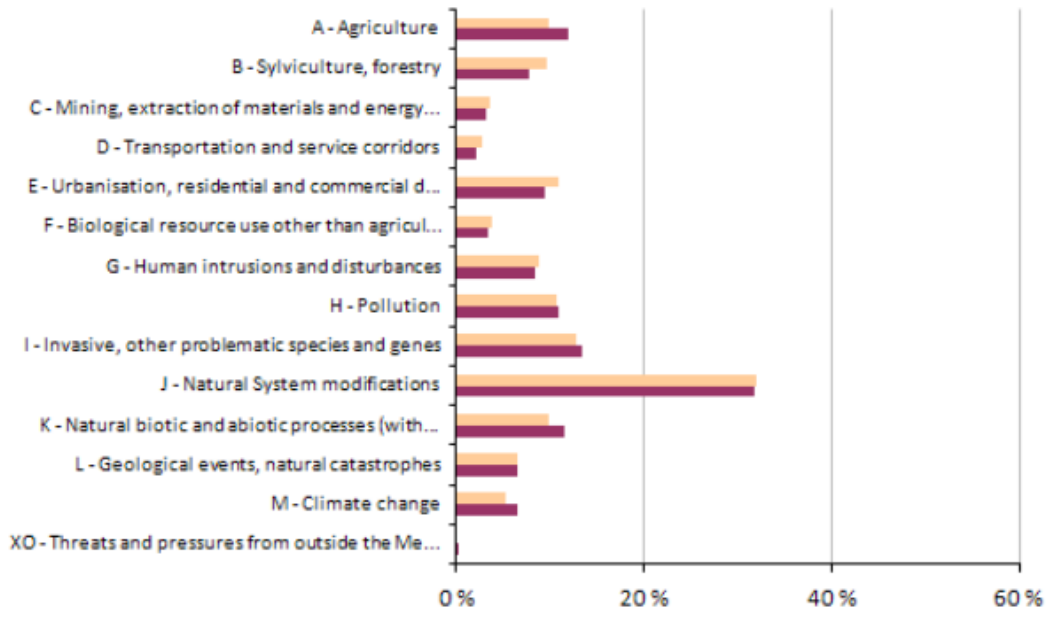
### HCV 4 & 5 – Low Risk



	<p>There are no indigenous people in Portugal, but it is important to evaluate the interests of the (local) population and social-economic functions of the forests and woodlands (including agricultural or municipal functions). See indicators 2.2.2, 2.2.3, 2.2.6, and 2.6.1.</p> <p><b>HCV 6 – Low risk</b></p> <p>Significant cultural features created intentionally by humans are identified and sufficient buffers are applied, since the criteria for identifying HCV 6 for Portugal are based on international or legal frameworks that already foresee the safeguards needed to protect/maintain the cultural values identified.</p>
Means of Verification	<ul style="list-style-type: none"> <li>• Field studies suppliers</li> <li>• Harvesting operation maps and feedstock suppliers</li> <li>• Internet research</li> <li>• GIS maps of HCV areas.</li> <li>• Interviews and contacts with stakeholders</li> <li>• Priority Classified Habitat and species catalogue</li> </ul>
Evidence Reviewed	<ul style="list-style-type: none"> <li>• SNAC Legislation <a href="https://dre.pt/application/file/70698029">https://dre.pt/application/file/70698029</a></li> <li>• RNAP: <a href="http://www.icnf.pt/portal/ap/ap">http://www.icnf.pt/portal/ap/ap</a></li> <li>• National Conservation Plano of threatened Flora information <a href="http://www.icnf.pt/portal/naturaclas/patrinatur/conserv-flora-perigo">http://www.icnf.pt/portal/naturaclas/patrinatur/conserv-flora-perigo</a></li> <li>• Site characterization SIC e ZPE: <a href="http://www.icnf.pt/portal/naturaclas/rn2000/p-set/Plan-set-docs">http://www.icnf.pt/portal/naturaclas/rn2000/p-set/Plan-set-docs</a></li> <li>• Data Base for fauna and flora specific plans: <a href="http://www.icnf.pt/portal/naturaclas/patrinatur/especies">http://www.icnf.pt/portal/naturaclas/patrinatur/especies</a></li> <li>• DRE: <a href="http://www.icnf.pt/portal/icnf/legisl/legislacao/2012/lei-n.o-53-2012-de-5-de-setembro.-d.-r.-n.o-172-serie-i">http://www.icnf.pt/portal/icnf/legisl/legislacao/2012/lei-n.o-53-2012-de-5-de-setembro.-d.-r.-n.o-172-serie-i</a></li> <li>• <a href="http://www.icnf.pt/portal/florestas/profs/alt-minh">http://www.icnf.pt/portal/florestas/profs/alt-minh</a></li> <li>• <a href="http://www.icnf.pt/portal/florestas/profs/baix-minh">http://www.icnf.pt/portal/florestas/profs/baix-minh</a></li> <li>• <a href="http://www.icnf.pt/portal/florestas/profs/nordest">http://www.icnf.pt/portal/florestas/profs/nordest</a></li> <li>• <a href="http://www.icnf.pt/portal/florestas/profs/centr-lit">http://www.icnf.pt/portal/florestas/profs/centr-lit</a></li> <li>• <a href="http://www.icnf.pt/portal/florestas/profs/ampedv">http://www.icnf.pt/portal/florestas/profs/ampedv</a></li> <li>• Reptile and amphibious of Portugal (2008): <a href="http://www.icnf.pt/portal/naturaclas/patrinatur/atlas-anfi-rept/anfibios">http://www.icnf.pt/portal/naturaclas/patrinatur/atlas-anfi-rept/anfibios</a></li> <li>• Red book for Portuguese Vertebrates (2005): <a href="http://www.icnf.pt/portal/naturaclas/patrinatur/lvv">http://www.icnf.pt/portal/naturaclas/patrinatur/lvv</a></li> <li>• Flora identification: <a href="http://www.icnf.pt/portal/naturaclas/rn2000/p-set/psrn-flora">http://www.icnf.pt/portal/naturaclas/rn2000/p-set/psrn-flora</a></li> <li>• Electric wire line manual (ICNB 2008) <a href="http://www.icnf.pt/portal/naturaclas/ordgest/aa/resource/doc/man-infra-lin">http://www.icnf.pt/portal/naturaclas/ordgest/aa/resource/doc/man-infra-lin</a></li> <li>• Law for natural values cadastre: Decree-Law n.º 242/2015 at 15/10 <a href="https://dre.pt/application/conteudo/70693924">https://dre.pt/application/conteudo/70693924</a></li> <li>• Fresh water Fish National cartography: <a href="http://www.cartapiscicola.org/">http://www.cartapiscicola.org/</a></li> <li>• Flora cartographic source: <a href="http://www.flora-on.pt/">http://www.flora-on.pt/</a></li> <li>• Cartography (2015) <a href="http://webgis.spea.pt/AtlasAvesInvernantesMigradoras/">http://webgis.spea.pt/AtlasAvesInvernantesMigradoras/</a></li> <li>• AIIF: <a href="http://www.aiff.org.pt/assets/ESTUDO_Prospetivo_-_Sector-Florestal.pdf">http://www.aiff.org.pt/assets/ESTUDO_Prospetivo_-_Sector-Florestal.pdf</a></li> <li>• AIIF: <a href="http://www.aiff.org.pt/assets/Relatorio-de-Characterizacao-da-Fileira-Florestal-2014-160p-CAPA-3-spread....pdf">http://www.aiff.org.pt/assets/Relatorio-de-Characterizacao-da-Fileira-Florestal-2014-160p-CAPA-3-spread....pdf</a></li> <li>• ICNF: <a href="http://www.icnf.pt/portal/florestas/ifn/resource/ficheiros/ifn/ifn6-res-prelimv1-1">http://www.icnf.pt/portal/florestas/ifn/resource/ficheiros/ifn/ifn6-res-prelimv1-1</a></li> <li>• Status &amp; Trends in Sustainable Forest Management in Europe <a href="https://www.unece.org/fileadmin/DAM/publications/timber/Forest_Europe_report_2011_web.pdf">https://www.unece.org/fileadmin/DAM/publications/timber/Forest_Europe_report_2011_web.pdf</a></li> <li>• ICNF: <a href="http://www.icnf.pt/portal/florestas/dfci/Resource/doc/rel/2013/relatorio-dfci-ap-2013">http://www.icnf.pt/portal/florestas/dfci/Resource/doc/rel/2013/relatorio-dfci-ap-2013</a></li> <li>• ICNF: <a href="http://www.icnf.pt/portal/florestas/dfci/relat/raa/resource/ficheiros/ree2012/rel-recup-inc-catraia-set-v5">http://www.icnf.pt/portal/florestas/dfci/relat/raa/resource/ficheiros/ree2012/rel-recup-inc-catraia-set-v5</a></li> <li>• Cartography ICNF: <a href="https://geocatalogo.icnf.pt">https://geocatalogo.icnf.pt</a></li> <li>• HABEAS (WWF): <a href="http://www.habeas-med.org/webgis/pt_en/">http://www.habeas-med.org/webgis/pt_en/</a></li> </ul>

Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
<p>Comment or Mitigation Measure</p>	<p>The control system for feedstock, which also includes regular follow-up of suppliers and whenever necessary, at scheduled intervals, inspections to suppliers' processes, are duly implemented. All used material is traceable to its origin through the harvest manifests and/or transport guides. All suppliers must comply with the laws in force, which are supervised by the Tax Authority and the ICNF.</p> <p>BSL identifies and maps areas with high conservation values (HCVs) before the harvest commences. HCV 1 and 3 were assessed to have a specified risk, that's why extra effort is needed to identify and map these values in practice on paper, regarding the forest plot. Internet sources, as well as the local situation needs to be well studied.</p> <p>Some HCV areas are designated as protected and classified areas at the national or EU level (Natura 2000). There are also smaller areas or biotopes important to biodiversity or classified as priority species' habitats. Habitats and species vulnerable to forestry operations are identified within the scope of Reed Natura2000 and Habitats and Birds Directive reports.</p> <p>Steps taken:</p> <ul style="list-style-type: none"> <li>• Study publicly available sources (internet sites) and other information regarding the plots where harvesting operations are planned and their surroundings;</li> <li>• Inform feedstock suppliers on found results regarding possible risks in front;</li> <li>• Onsite assessment of the plots and their surroundings prior to harvesting, measures are taken for example, when habitats are found;</li> <li>• Development of adaptations to the harvesting plans, if needed.</li> </ul> <p>Below the main sources of information, used to prepare the identification of these values for our suppliers. The forestry specialist evaluate every plot before the harvesting operations begins. BSL monitors and/or inspects the suppliers and harvesting areas.</p> <p><b>HCV 1 – Species diversity</b></p> <p>There is a specified risk that forest operations on private and communitarian grounds and public areas not managed by ICNF could harm species diversity. Species diversity is evaluated and recorded before harvesting operations commence. Caution and best practises are applied. Special attention is given to the National System of Classified Areas (SNAC) and to the Important Bird and Biodiversity Areas (IBAs). See also below, indicator 2.2.4</p> <p><i>Some information sources:</i></p> <ul style="list-style-type: none"> <li>• Classified areas: <a href="http://www.icnf.pt/portal/naturaclas/cart">http://www.icnf.pt/portal/naturaclas/cart</a> and HABEAS (WWF): <a href="http://www.habeas-med.org/webgis/pt_en/">http://www.habeas-med.org/webgis/pt_en/</a></li> <li>• Protected area plans: <a href="http://www.icnf.pt/portal/naturaclas/ordgest/poap">http://www.icnf.pt/portal/naturaclas/ordgest/poap</a></li> <li>• Endangered species: <a href="http://www.icnf.pt/portal/naturaclas/patrinatur/especies">http://www.icnf.pt/portal/naturaclas/patrinatur/especies</a></li> <li>• Endemic species: <a href="http://naturdata.com/index.php?option=com_content&amp;view=article&amp;id=78&amp;Itemid=60">http://naturdata.com/index.php?option=com_content&amp;view=article&amp;id=78&amp;Itemid=60</a></li> <li>• Digital mapping information from the Manual das Linhas Eléctricas [Manual of Electric Lines] (ICNB 2008)</li> <li>• Important Bird Areas of Portugal at: <a href="http://ibas-terrestres.spea.pt/">http://ibas-terrestres.spea.pt/</a></li> <li>• Regional Forest Plans (PROF): <a href="http://www.icnf.pt/portal/florestas/profs">http://www.icnf.pt/portal/florestas/profs</a></li> </ul> <p><b>HCV 3 – Ecosystems and habitats</b></p> <p>There is a specified risk that forest operations on private and communitarian grounds and public areas not managed by ICNF could harm ecosystems and habitats. In these situations, BSL demands to evaluate the environmental impacts (on Ecosystems and habitats) of the forest operations before the forest operations commence. Caution and best practises are applied. See also below, indicator 2.2.3.</p> <p><i>Some information sources:</i></p> <ul style="list-style-type: none"> <li>• Habitats Directive (2007-2012)</li> <li>• Rede Natura 2000 data base: <a href="http://www.icnf.pt/portal/naturaclas/rn2000">http://www.icnf.pt/portal/naturaclas/rn2000</a></li> <li>• Important Bird Areas of Portugal at: <a href="http://ibas-terrestres.spea.pt/">http://ibas-terrestres.spea.pt/</a></li> <li>• Convention on Biological Diversity (CBD) via DL no. 21/93, dated 29 June.</li> </ul>

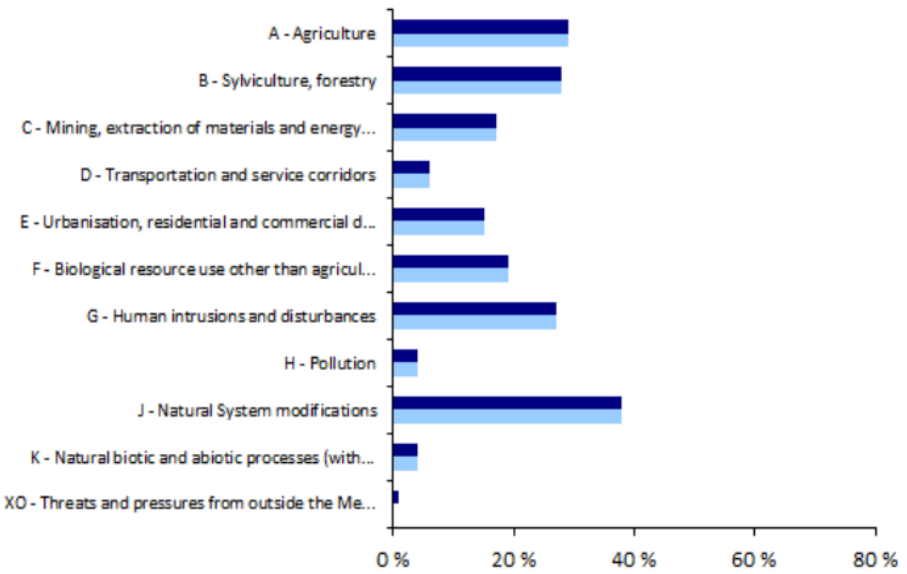
	Indicator																																										
2.1.2	The Biomass Producer has implemented appropriate control systems and procedures to identify and address potential threats to forests and other areas with high conservation values from forest management activities.																																										
Finding	<p>Forest operations are identified in the National Report on the Implementation of Directive Habitats and Birds to present threat (present situation) in 6 habitats and pressure (future) on 8 habitats accounting for 3.8% and 5%, respectively, of the total assessments. A similar assessment was performed, having species (except birds) as the scope and the numbers do not differ much. Forestry presents a threat to 7.7% of the species assessed and puts pressure on 9.6% of the total 426 species considered. Please refer to images below. Forest activities have a significant impact on bird attributes with 30% of the assessed species demonstrating to be threatened, as can be seen in the graphic dedicated to the subject (image 3).</p>  <table border="1" data-bbox="359 784 1404 1366"> <caption>Data for Image 1: Percentage of assessed habitats affected by one or more pressures/threats of high importance</caption> <thead> <tr> <th>Category</th> <th>Pressure (%)</th> <th>Threat (%)</th> </tr> </thead> <tbody> <tr> <td>A - Agriculture</td> <td>20</td> <td>15</td> </tr> <tr> <td>B - Sylviculture, forestry</td> <td>5</td> <td>3</td> </tr> <tr> <td>C - Mining, extraction of materials and energy...</td> <td>2</td> <td>1</td> </tr> <tr> <td>D - Transportation and service corridors</td> <td>5</td> <td>8</td> </tr> <tr> <td>E - Urbanisation, residential and commercial d...</td> <td>2</td> <td>3</td> </tr> <tr> <td>F - Biological resource use other than agricul...</td> <td>3</td> <td>4</td> </tr> <tr> <td>G - Human intrusions and disturbances</td> <td>22</td> <td>23</td> </tr> <tr> <td>H - Pollution</td> <td>8</td> <td>7</td> </tr> <tr> <td>I - Invasive, other problematic species and genes</td> <td>28</td> <td>30</td> </tr> <tr> <td>J - Natural System modifications</td> <td>25</td> <td>24</td> </tr> <tr> <td>K - Natural biotic and abiotic processes (with...</td> <td>12</td> <td>14</td> </tr> <tr> <td>L - Geological events, natural catastrophes</td> <td>2</td> <td>5</td> </tr> <tr> <td>M - Climate change</td> <td>0</td> <td>2</td> </tr> </tbody> </table> <p data-bbox="606 1411 1244 1478">% of <b>habitat assessments</b> reported as being affected by one or more 'high' importance pressures/threats</p> <p data-bbox="335 1500 606 1534"> <span style="color: orange;">■</span> pressure    <span style="color: purple;">■</span> threat </p> <p data-bbox="335 1534 1436 1601">Image 1 Percentage of assessed habitats affected by one or more pressures/threats of high importance</p>	Category	Pressure (%)	Threat (%)	A - Agriculture	20	15	B - Sylviculture, forestry	5	3	C - Mining, extraction of materials and energy...	2	1	D - Transportation and service corridors	5	8	E - Urbanisation, residential and commercial d...	2	3	F - Biological resource use other than agricul...	3	4	G - Human intrusions and disturbances	22	23	H - Pollution	8	7	I - Invasive, other problematic species and genes	28	30	J - Natural System modifications	25	24	K - Natural biotic and abiotic processes (with...	12	14	L - Geological events, natural catastrophes	2	5	M - Climate change	0	2
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% of **species assessments** reported as being affected by one or more 'high' importance pressures/threats

■ pressure ■ threat

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



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

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

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

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

Abastena's Forest Management Group, <http://abastena.pt/ggfa.php> with national scope and specific helpdesks across the country.

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

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

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

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

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

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

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

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

Natural Park of São Mamede (PEPNSSM);

Natural Park of Arrábida (PEPNA);

Natural Park of Guadiana Valley (PEPNVG);

Natural Park of Tejo Internacional (PEPNTI);

Natural Park of Douro Internacional (PEPNDI);

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

Natural Park of Litoral Norte (PEPNLN);

Natural Park of Montesinho (PEPNM);

Natural Park of Sintra Cascais (PEPNSC);

Natural Park of Ria Formosa (PEPNRF);

Natural Park of Serra da Estrela (PEPNSE);

#### **Risk conclusion:**

##### **HCV1 – Specified Risk**

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

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

Regarding the establishment of projects and programmes aiming to enhance the conservation status of HCV, the LIFE Programme has facilitated the development of a series of projects in Portugal (<http://ec.europa.eu/environment/life/project/Projects/index.cfm?fuseaction=home.getDocs>), many of which permit contracts with owners as good conservation management practice, support and awareness-raising for owners and schools, and also vertical signs of species' territorial areas. A series of documents is also produced, from simple brochures to manuals of good practice (an example being the conservation manual for the Bonelli's eagle and the good forestry and hunting practice manual). Some projects include action plans for species conservation. Most projects have as their objective the conservation of potential HCV 1

species, being carried out by Natura2000 Network. Some NGOs, such as Sociedade Portuguesa para o Estudo das Aves (SPEA) [Portuguese Society for the Study of Birds]), have formed working groups to monitor species, such as the Bonelli's eagle working group (GTAB) and the night birds working group (GTAN).

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

### **HCV 2 – Low risk**

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

Existing safeguarding measures include:

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

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

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

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

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

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

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

### **HCV 3 – Specified risk**

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

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

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

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

	<p>attention in order to achieve a more adequate and broad-reaching implementation of the CBD's COP (Conference of Parties) decisions in Portugal.</p> <p><b>HCV 4 – Low risk</b></p> <p>In Portugal there are several instruments related to the conservation of river basins, soil conservation, and protection against the risk of fire.</p> <p>In the case of river basins, information relating to the classification of flood plains, areas threatened by floods and other relevant information can be partially obtained by consulting areas included in the REN. River basin plans also contain information that may be relevant, as do PROFs, especially where they refer to protection forests.</p> <p>For information about erosion control it is essential to consult documentation relevant to the risk of erosion. Some of this information is contained in the REN, which identifies, on a scale of 1:25.000, areas at high risk of erosion, as well as zones of instability. Areas of high fire risk are identified in fire risk maps (ICNF) and in municipal forest fire plans.</p> <p>Within the national context, the structure of property, being extremely fragmented, reduces the dependence on ecosystem services and means this is not critical. Furthermore, the probability of forest management activities having a significant impact on the same service is negligible.</p> <p>Several legal instruments safeguard the functions of protection and regulate intervention in these areas. Examples of this are the Water Law , river basin plans (PBH) , public waters and dams planning (POAAP) , National Ecological Network , the Land law , etc.</p> <p>Not applicable, as no HCV4 is considered to exist at this scale.</p> <p><b>HCV 5 – Low risk</b></p> <p>Not applicable to Portugal.</p> <p>In Portugal, the use and enjoyment of common forest land is regulated (Lei dos Baldios [common land law] – Decree-Law No. 165/2015, 17th August). At present, this land is not indispensable to provide for the basic needs of the adjacent communities.</p> <p><b>HCV 6 – Low risk</b></p> <p>The criteria for identifying HCV 6 for Portugal are based on international or legal frameworks that already foresee the safeguards needed to protect/maintain the cultural values identified. At the same time, it is considered that the values are legally recognized and enforced.</p>
Means of Verification	<ul style="list-style-type: none"> <li>• Existing legal framework. Laws, regulations and control bodies</li> <li>• Forestry work/harvesting authorisation/ allocation</li> <li>• Good environmental practices manual in Sustainable Forest Management</li> <li>• Forest Management Plans</li> <li>• Monitoring records</li> <li>• Interviews with staff involved</li> <li>• Regional, publicly available data from credible third parties</li> </ul>
Evidence Reviewed	<ul style="list-style-type: none"> <li>• Cartography ICNF (SIC, ZPE, RNAP): <a href="https://geocatalogo.icnf.pt">https://geocatalogo.icnf.pt</a></li> <li>• HABEAS (WWF): <a href="https://webgis.habeas-med.org/lizmap/www/index.php/view/map/?repository=habeas&amp;project=habeas_2_0_pt_pt">https://webgis.habeas-med.org/lizmap/www/index.php/view/map/?repository=habeas&amp;project=habeas_2_0_pt_pt</a></li> <li>• LEAF WebGiS: <a href="http://epic-webgis-portugal.isa.ulisboa.pt/maps/epic">http://epic-webgis-portugal.isa.ulisboa.pt/maps/epic</a></li> <li>• Endemic and protected flora cartographic source: <a href="http://www.flora-on.pt/">http://www.flora-on.pt/</a></li> <li>• Birds (2008-2012) and Habitats (2007-2012) Directive Implementation Reports, <a href="http://www2.icnf.pt/portal/pn/biodiversidade/rn2000/dir-ave-habit">http://www2.icnf.pt/portal/pn/biodiversidade/rn2000/dir-ave-habit</a></li> <li>• Decree-law No. 96/2013 <a href="https://dre.pt/application/file/a/497960">https://dre.pt/application/file/a/497960</a></li> <li>• Forest Producers Organizations: <a href="http://www.icnf.pt/portal/florestas/gf/opf/resource/doc/dcnf-c-list">http://www.icnf.pt/portal/florestas/gf/opf/resource/doc/dcnf-c-list</a></li> <li>• Decree-law No. 151-B, October 31<sup>st</sup> <a href="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">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</a></li> <li>• Regional Forest Planning (PROF) <a href="http://www.icnf.pt/portal/florestas/profs">http://www.icnf.pt/portal/florestas/profs</a></li> <li>• Controlled Wood National Risk Assessment, 1<sup>st</sup> Draft, developed according to procedure FSC-PRO-60-002 V 3-0, 2016/10/13, <a href="https://ic.fsc.org/en/document-center/id/144">https://ic.fsc.org/en/document-center/id/144</a></li> <li>• Decree-Law 242/2015 of 15<sup>th</sup> October, <a href="https://dre.pt/application/conteudo/70693924">https://dre.pt/application/conteudo/70693924</a></li> <li>• Livro Vermelho dos Vertebrados, 2015, ICNF, <a href="http://www.icnf.pt/portal/naturaclas/patrinatur/lvv">http://www.icnf.pt/portal/naturaclas/patrinatur/lvv</a></li> </ul>

- Manual das Linhas Eléctricas, 2010, ICNB, [http://www.icnf.pt/portal/naturaclas/ordgest/aa/resource/doc/doc\\_orient\\_linhaselectric\\_jul10\\_2](http://www.icnf.pt/portal/naturaclas/ordgest/aa/resource/doc/doc_orient_linhaselectric_jul10_2)
- FSC Principles and Criteria for Forest Stewardship, 2015, <https://ic.fsc.org/en/document-center/id/59>
- Natura 2000 sectorial Plan <http://www.icnf.pt/portal/naturaclas/rn2000/p-set>
- Water Law Framework <http://www.apambiente.pt/index.php?ref=16&subref=7&sub2ref=15&sub3ref=93#LadaAgua>
- River basins plans framework <https://www.apambiente.pt/?ref=16&subref=7&sub2ref=9&sub3ref=834>
- Public waters and dams planning <https://www.apambiente.pt/index.php?ref=16&subref=7&sub2ref=10&sub3ref=96>
- National Ecological Network
- North <http://www.ccdr-n.pt/servicos/ordenamento-territorio/reserva-ecologica-nacional>
- Centre <http://www.ccdr-n.pt/servicos/ordenamento-territorio/reserva-ecologica-nacional>
- Lisbon and Tejo Valley <http://www.ccdr-lvt.pt/pt/reserva-ecologica-nacional-ren/8395.htm>
- Alentejo <http://webb.ccdr-a.gov.pt/index.php/ord/ren>
- Algarve <https://www.ccdr-alg.pt/site/info/reserva-ecologica-nacional-ren>
- Land Law framework [http://www.dgterritorio.pt/ordenamento\\_e\\_cidades/projetos\\_em\\_curso/reforma\\_do\\_quadro\\_legal\\_ot\\_u/Law\\_de\\_bases\\_da\\_politica\\_de\\_solos\\_de\\_ot\\_urbanismo/apresentacao/](http://www.dgterritorio.pt/ordenamento_e_cidades/projetos_em_curso/reforma_do_quadro_legal_ot_u/Law_de_bases_da_politica_de_solos_de_ot_urbanismo/apresentacao/)
- Further documents reviewed:
- [http://cdr.eionet.europa.eu/Converters/run\\_conversion?file=pt/eu/art17/envuc2hfw/PT\\_habitats\\_reports.xml&conv=350&source=remote#92B0](http://cdr.eionet.europa.eu/Converters/run_conversion?file=pt/eu/art17/envuc2hfw/PT_habitats_reports.xml&conv=350&source=remote#92B0)
- Law for natural values cadastre: Decree-Law No. 242/2015 of 15/10 <https://dre.pt/application/conteudo/70693924>
- 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://www.habeas-med.org/webgis/pt_en/LEAF_EPICWebGiSPortugal/)
- <http://epic-webgisportugal.isa.ulisboa.pt/maps/epic?format=image/png;%20mode=8bit&startExtent=-1523000,4400000,-143668,5180000>
- SNAC : Legislation <https://dre.pt/application/file/70698029>
- RNAP: <http://www.icnf.pt/portal/ap/ap>
- Rede Natura 2000: <http://www.icnf.pt/portal/naturaclas/rn2000>
- Important Bird Areas of Portugal at: <http://ibas-terrestres.spea.pt/>
- Site characterization SIC and ZPE: <http://www.icnf.pt/portal/naturaclas/rn2000/p-set/Plan-setdocs>
- Cartography: <http://www.icnf.pt/portal/naturaclas/cart>
- Protected area plans (POAP): <http://www.icnf.pt/portal/naturaclas/ordgest/poap>
- Data Base for fauna and flora specific plans: <http://www.icnf.pt/portal/naturaclas/patrinatur/especies>
- Red book for Portuguese Vertebrates (2005): <http://www.icnf.pt/portal/naturaclas/patrinatur/lvv>
- Nesting and wintering Bird Atlas on Portugal (2008): ND online
- Cartography (2015) <http://webgis.spea.pt/AtlasAvesInvernantesMigradoras/>
- Reptile and amphibians of Portugal (2008): <http://www.icnf.pt/portal/naturaclas/patrinatur/atlas-anfi-rept/anfibios>
- Fresh water Fish National cartography :<http://www.cartapiscicola.org/#>
- Flora identification: <http://www.icnf.pt/portal/naturaclas/rn2000/p-set/psrn-flora>
- Flora cartographic source: <http://www.flora-on.pt/>
- National Conservation Plan of threatened Flora information <http://www.icnf.pt/portal/naturaclas/patrinatur/conserv-flora-perigo>



	<p><a href="http://naturdata.com/index.php?option=com_content&amp;view=article&amp;id=78&amp;Itemid=60">http://naturdata.com/index.php?option=com_content&amp;view=article&amp;id=78&amp;Itemid=60</a></p> <p>Electric wire line manual (ICNB 2008)</p> <p><a href="http://www.icnf.pt/portal/naturaclas/ordgest/aa/resource/doc/man-infra-lin">http://www.icnf.pt/portal/naturaclas/ordgest/aa/resource/doc/man-infra-lin</a></p> <p>Regional Forest Plans (PROF): <a href="http://www.icnf.pt/portal/florestas/profs">http://www.icnf.pt/portal/florestas/profs</a></p> <p>AIIF: <a href="http://www.aiff.org.pt/assets/ESTUDO_Prospetivo_-_Sector-Florestal.pdf">http://www.aiff.org.pt/assets/ESTUDO_Prospetivo_-_Sector-Florestal.pdf</a></p> <p>AIIF: <a href="http://www.aiff.org.pt/assets/Relatorio-de-Characterizacao-da-Fileira-Florestal-2014-160pCAPA-3-spread....pdf">http://www.aiff.org.pt/assets/Relatorio-de-Characterizacao-da-Fileira-Florestal-2014-160pCAPA-3-spread....pdf</a></p> <p>ICNF: <a href="http://www.icnf.pt/portal/florestas/ifn/resource/ficheiros/ifn/ifn6-res-prelimv1-1">http://www.icnf.pt/portal/florestas/ifn/resource/ficheiros/ifn/ifn6-res-prelimv1-1</a></p> <ul style="list-style-type: none"> <li>• Planos de Gestão Florestal de áreas públicas: <a href="http://www.icnf.pt/portal/florestas/gf/pgf/publicitacoes/encerradas">http://www.icnf.pt/portal/florestas/gf/pgf/publicitacoes/encerradas</a></li> <li>• Autoridade Florestal Nacional, 2010, Florestat – Aplicação para a Consulta dos Resultados do 5º Inventário Florestal Nacional. Disponível em <a href="http://www.icnf.pt/portal/florestas/ifn/ifn5/florestat">http://www.icnf.pt/portal/florestas/ifn/ifn5/florestat</a></li> </ul> <p>Reserva Ecológica Nacional</p> <p><a href="https://dre.pt/application/dir/pdf1sdip/2012/11/21200/0630806346.pdf">https://dre.pt/application/dir/pdf1sdip/2012/11/21200/0630806346.pdf</a></p> <p>Sistema Nacional de Defesa da Floresta Contra Incêndios:</p> <p><a href="https://dre.pt/application/dir/pdf1sdip/2006/06/123A00/45864599.pdf">https://dre.pt/application/dir/pdf1sdip/2006/06/123A00/45864599.pdf</a></p> <ul style="list-style-type: none"> <li>• PANCD <a href="https://dre.pt/application/file/65985917">https://dre.pt/application/file/65985917</a></li> </ul> <p>PDR2020 <a href="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">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</a></p> <p>Fundo Florestal Permanente:</p> <p><a href="http://www.icnf.pt/portal/icnf/noticias/gloablnews/fundoflorestal-permanente-ffp">http://www.icnf.pt/portal/icnf/noticias/gloablnews/fundoflorestal-permanente-ffp</a></p> <p>Alves, A. M., Pereira, J. S., Correia, A. V., 2012. Silvicultura - A gestão dos ecossistemas florestais, Fundação Calouste Gulbenkian.</p> <ul style="list-style-type: none"> <li>• ICNF <a href="http://www.icnf.pt/portal/florestas/aip/aip-monum-pt">http://www.icnf.pt/portal/florestas/aip/aip-monum-pt</a></li> </ul> <p>DRE: <a href="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">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</a></p>
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	<p>There is a specified risk that forest operations on private and communitarian grounds and public areas not managed by ICNF could harm species diversity, ecosystems and habitats. Species diversity is evaluated and recorded before harvesting operations commence. Special attention is given to the National System of Classified Areas (SNAC) and to the Important Bird and Biodiversity Areas (IBAs).</p> <p>BSL identifies and addresses potential threats to forests and other areas with high conservation values (HCVs). The control system for feedstock, which also includes regular follow-up of suppliers and whenever necessary, at scheduled intervals, inspections to suppliers' processes, is duly implemented. Some HCV areas are designated as protected and classified areas at the national or EU level (Natura 2000). There are also smaller areas and biotopes important to biodiversity, which can be classified as priority species' habitats.</p> <p>Steps taken:</p> <ul style="list-style-type: none"> <li>• Desk Assessment of possible impacts of harvesting operations, regarding Publicly available information from credible third parties;</li> <li>• Training of suppliers on identification of forests with HCVs, and methods to protect HCVs;</li> <li>• Identification and mapping of protected species, habitats and key ecosystems on the plot before harvesting;</li> <li>• Development of adaptations to the harvesting plans, if needed;</li> <li>• Harvesting according to best practices in sustainable forest management;</li> </ul> <p>See also below, indicator 2.2.4 and indicator 2.2.3.</p>

	Indicator
2.1.3	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not sourced from forests converted to production plantation forest or non-forest lands after January 2008.
Finding	<p>The Portuguese forest is defined by its recent origins and by heavy human intervention. In general, the Portuguese forest is recent. In Europe, Portugal is the country in which the transition from deforestation to reforestation occurred most rapidly: forest covered 4 to 7 percent of the mainland in 1870 and increase to cover more than 30 per cent in less than 100 years.</p> <p>For the purpose of this document and specifically for this indicator, the concept of “forest” will be described by the definition of “natural forest” from the <a href="#">FSC forest management standard for Portugal</a> (approved by FSC on 18<sup>th</sup> 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 interventions occur, coming from a combination of natural regeneration and artificial regeneration, composed by local indigenous species in which many of the characteristics of natural forests are present. Natural forests do not include:</p> <ul style="list-style-type: none"> <li>• Areas where the vegetation is not dominated by trees;</li> <li>• Areas that were not previously forested;</li> <li>• Areas that do not yet contain many of the characteristics and elements of native ecosystems.”</li> </ul> <p>FSC forest management standard for Portugal will also be used for the definition of “plantation”: “Forested area resulting from plantation or sowing, with the objective to produce timber or non-timber products, that can be composed by indigenous and non- indigenous species and include one or more of the following characteristics:</p> <ul style="list-style-type: none"> <li>• Reduced number of species</li> <li>• Intensive forestry</li> <li>• Regular plant spacing</li> <li>• Regular settlements”</li> </ul> <p>FAO’s Global Forest Resources Assessment of 2010 shows the following data regarding the Portuguese forest area:</p> <ul style="list-style-type: none"> <li>• Primary forest: 0.8%</li> <li>• Forest with the primary designated function of production: 59%</li> <li>• Forest within protected areas 20%</li> <li>• Planted forest 25%</li> </ul> <p>It is possible to assume that the remaining forest ecosystems comprising primary forests are protected under the Fundamental Nature Conservation Network (RFCN) (defined by Decree-Law No. 142/2008, amended by Decree-Law No. 242/2015, 15<sup>th</sup> October) which led to establish the Sistema Nacional de Areas Classificadas [National Classified Areas System], which comprises the major areas of environmental conservation and biodiversity:</p> <ul style="list-style-type: none"> <li>• RNAP;</li> <li>• SICs and ZPEs of the Natura2000 network;</li> </ul> <p>Any other areas classified under the umbrella of international commitments agreed upon by the Portuguese state, and areas of continuity:</p> <ul style="list-style-type: none"> <li>• REN;</li> <li>• RAN</li> <li>• DPH (public hydric domains), safeguarded by the respective legal regulations.</li> </ul> <p>Furthermore, the overall dynamics of the Portuguese forest cover is not promoted or supported by the demand of biomass. Simultaneously, the development of forest energy crops is not permitted in Portugal, through several legislation limitations, namely the mandatory previous authorization for premature final cutting of eucalyptus and Pinus Pinaster settlements (Decree-</p>

Law No.173/88 from May 17<sup>th</sup>), regulations for the introduction and environmental control of non-indigenous species (Decree-Law No. 565/99 from December 21<sup>st</sup>) and mainly the mandatory previous authorization for afforestation and reforestation activities using short rotation crops (Decree-Law No.175/88 from May 17<sup>th</sup>).

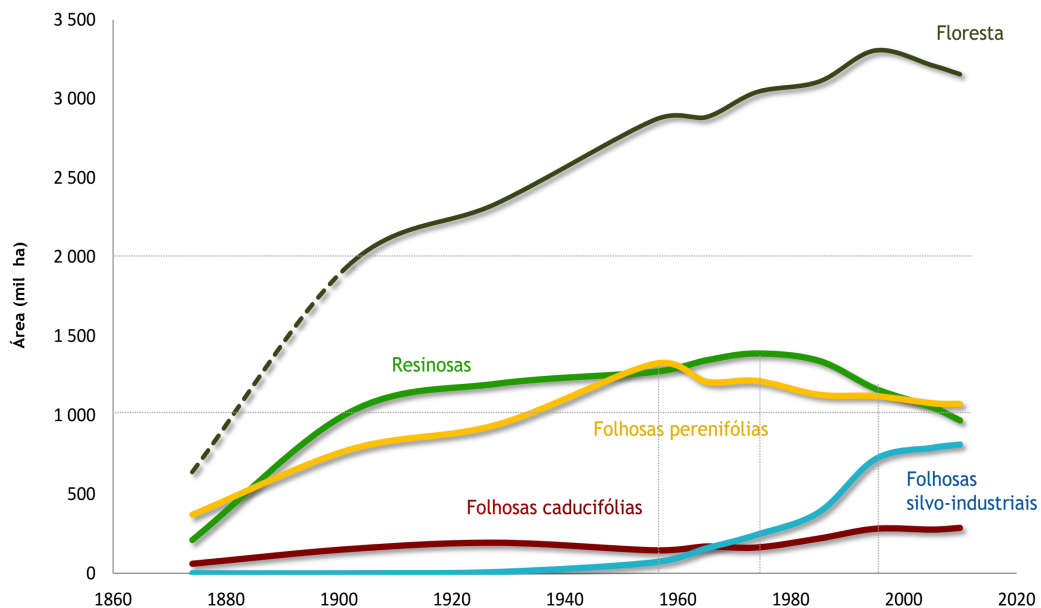


Figure 2 Historic evolution of the Portuguese forest cover 1874-2010 [José Uva, ICNF]

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

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

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

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

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

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

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

- In areas where the previous dominant species was Eucalyptus;
- 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<sup>th</sup> June);
- Riparian vegetation (Law 58/2005 and Law 54/2005);
- Holly (Decree-Law No. 423/89).

**Law enforcement:**

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

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

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

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 non-conformity with 88% of the total cases.

A recent report from the forest authority, ICNF, shows that a total of 4304 ha of land with various species was legally converted to eucalyptus plantation between 17/10/2013 and 25/01/2016 (excluding areas below 0.5ha).

Concluding, it is clear that two types of conversion are detected in Portugal:

- Legal type, which covers the majority of areas, including conversion to fast growth forest plantation or other plantations, agriculture, urbanization and dams.
- Illegal type, where conversion data is more complex and difficult to report. These cases are often reported in the media and NGO communications.

Considering the absence of complete legislative requirements regulating the conversion of forests to plantation and the statistics about the area converted after 2008, it is considered a specified risk that feedstock is sourced from forests converted to production plantation forest or non-forest lands after January 2008.

Means of Verification

- Historical maps and orthophotos from flights prior to 2008.
- Records of BPs' field inspections
- Monitoring records
- Forestry work/harvesting authorisation
- Cartography available and consultation with the competent bodies of the Autonomous Communities regarding transformations
- Management Plan, development project
- Signed agreements and contracts

	<ul style="list-style-type: none"> <li>• Feedstock Supplier Declaration</li> </ul>
Evidence Reviewed	<ul style="list-style-type: none"> <li>• Pereira, João et al. (2009). Floresta. In: Pereira, H. M., Domingos, T., Proença, V., Vicente, L. &amp; 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]</li> <li>• Global Forest Resources Assessment 2010, FAO, Rome, 2010</li> <li>• RJAAR Informative note No. 8, ICNF, <a href="http://www2.icnf.pt/portal/florestas/arboriz/resource/docs/not-info/RJAAR-Nota-Informativa-n8.pdf">http://www2.icnf.pt/portal/florestas/arboriz/resource/docs/not-info/RJAAR-Nota-Informativa-n8.pdf</a></li> <li>• 6.º INVENTÁRIO FLORESTAL NACIONAL</li> <li>• Legal Framework for Afforestation and reforestation activities (RJAAR), DL 96/2013, July 19<sup>th</sup>, <a href="http://www.icnf.pt/portal/florestas/arboriz/leg-reg">http://www.icnf.pt/portal/florestas/arboriz/leg-reg</a></li> <li>• Premature cutting of forest settlements: Law-decree No.173/88 from May 17<sup>th</sup></li> <li>• Conversion from natural Quercus suber and Quercus rotundifolia to other land uses: DL 169/2001, de 25/05 Artº 2º <a href="https://dre.pt/application/dir/pdf1sdip/2001/05/121A00/30533059.pdf">https://dre.pt/application/dir/pdf1sdip/2001/05/121A00/30533059.pdf</a> updated by DL 155/2004, 30/06 <a href="https://dre.pt/application/dir/pdf1sdip/2004/06/152A00/39673968.pdf">https://dre.pt/application/dir/pdf1sdip/2004/06/152A00/39673968.pdf</a></li> <li>• Conversion inside Protected and Classified areas: DL142/2008 of 24/07 Artº 43º <a href="https://dre.pt/application/dir/pdf1sdip/2008/07/14200/0459604611.PDF">https://dre.pt/application/dir/pdf1sdip/2008/07/14200/0459604611.PDF</a></li> <li>• DL 49/05 24/02 <a href="https://dre.pt/application/dir/pdf1sdip/2005/02/039A00/16701708.pdf">https://dre.pt/application/dir/pdf1sdip/2005/02/039A00/16701708.pdf</a></li> <li>• Destruction of natural riparian vegetation: Law 58/2005 29/12; Law 54/2005, of 15/11 (Artº 25º) <a href="https://dre.pt/application/dir/pdf1sdip/2005/11/219A00/65206525.pdf">https://dre.pt/application/dir/pdf1sdip/2005/11/219A00/65206525.pdf</a></li> <li>• Conversion from natural Ilex aquifolium DL423/89, 4/12 (Artº 1) <a href="https://dre.pt/application/dir/pdf1sdip/1989/12/27800/52915292.pdf">https://dre.pt/application/dir/pdf1sdip/1989/12/27800/52915292.pdf</a></li> <li>• Conversion from natural landscapes and hillside/slope erosion: DL 139/89 28/04 artº1 <a href="http://www.icnf.pt/portal/icnf/faqs/arbor/dl139-89">http://www.icnf.pt/portal/icnf/faqs/arbor/dl139-89</a></li> <li>• 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 <a href="https://dre.pt/application/dir/pdf1sdip/2013/10/21102/0000600031.pdf">https://dre.pt/application/dir/pdf1sdip/2013/10/21102/0000600031.pdf</a></li> </ul>
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	<p>BSL considers all pine stands as forests and eucalypt and poplar stands as plantations. BSL checks if forests have been changed to eucalypt or poplar plantations after 2008. When forest is converted to agricultural land or a plantation, or when land use change (conversion) is planned, the feedstock is not categorized as SBP compliant.</p> <p>When a eucalypt or poplar plantation are cut, the history of the plantation is investigated:</p> <ul style="list-style-type: none"> <li>• The year of conversion to plantation (if it was converted after 2008). If needed, interviews with stakeholders and residents are taken and the plot is searched for tree stumps.</li> <li>• Was it a forest before being converted to plantation?</li> </ul> <p>This is dealt with in the Feedstock Supplier Declaration and addressed in the field operations checklist.</p>

	Indicator
2.2.1	The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them.
Finding	<p>The Portuguese Legal system defines a forest management and planning framework which includes three levels:</p> <ul style="list-style-type: none"> <li>Regional Forest Plans (PROF) are instruments of sectorial policies for regional level. PROF set general guidelines for intervention, use and forest exploration with the goal to promote and guarantee the sustainable production of all products and services, preserving the objectives of National Forest Strategy (ENF). PROF are binding for administrative authorities, at all levels. PROF are, at the moment, under revision and from the proposed documents put under public consultation it was possible to verify a general decrease in the minimum area threshold for the obligation to have an approved PGF. Moreover, PROF will define the maximum threshold for continuous cutting and single species regular settlements.</li> <li>Forest Management Plans (PGF) are tools for the management of forest areas at forest unit/exploration level, following the guidelines set by the applicable Regional Forest Plan. PGF set, in time and space, the nature of concrete interventions and exploration of the existing resources in the forest unit, aiming for the sustainable production of products and services, considering the activities and uses of the surrounding areas, as well as the existing restrictions of legal and binding character.</li> <li>Specific Plans for Forest Intervention (PEIF) are instruments that produce specific measures for the intervention in forest areas with major biotic problems (e.g.: invasive species, plagues or diseases) or abiotic (e.g.: high risk of forest fire).</li> </ul> <p><b>PGF is mandatory for all public managed forests:</b> Every community forest area (Baldio) must have an approved PGF (or PUB – Community areas use Plan), independently of its dimension. PGF and PUB are prepared by the public body responsible for the management of the public forest unit and it is assessed by ICNF.</p> <p><b>PGF is mandatory for private forest areas in the following cases:</b></p> <ul style="list-style-type: none"> <li>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.</li> <li>areas integrated in ZIF (Forest Intervention Zones) in conformity with the dispositions of Decree-law No. 127/2005, from August 5th, in the wording of Decree-laws 15/2009 from January 14th, 2/2011 from January 6th and 27/2014 from February 18th. In this case, the general PGF of the ZIF is adopted or a specific PGF must be prepared.</li> <li>a public funding is conceded (European, national or other, e.g.: Proder/PDR 2020 program) for forest management or afforestation. This obligation was in force until February 2014.</li> </ul> <p>For private forests, the PGF is prepared by the entity responsible for the forest management and submitted to ICNF for approval.</p> <p><b>Within SNAC [National System of Classified Areas]:</b> When a forest unit overlaps an area classified for nature and biodiversity conservation (Natura 2000 network, Protected Areas, among others), the PGF must include a Biodiversity Management Program (PGB), aimed at ensuring the compatibility and contribution of the proposed interventions in the PGF for the conservation of protected species and habitats, whose favourable conservation status depends on the forest management. PGB must consider the applicable dispositions of the PSRN2000 (Sectorial Plan for the Natura 2000 network), as well as other applicable plans and regulations (e.g. Protected Areas management plans and regulations; Territory planning). Support documentation for forest owners and managers is available.</p> <p><b>General cases:</b> When forest owners are not obliged to develop and submit a PGF, the applicable PROF, PSRN2000 and several good practices handbooks supply general guidance. The objective of these documents is to support forest owners, managers and planners on the preparation</p>

and implementation of forest projects and operations, aiming to ensure their compatibility with the existing natural values and even contribute towards the improvement of their conservation status.

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

Decree-law No.151-B/2013 Defines the obligation to perform an Environmental Impact Assessment (AIA) on every afforestation and reforestation occurring in areas greater than 350ha (70ha in sensitive areas) or greater than 140ha (30ha in sensitive areas) if the subject area, in conjunction with pre-existent forest stands of the same species, separated by less than 1 km, would produce a continuous forested area of more than 350ha (70ha in sensitive areas). It also establishes that an AIA must be called when there is a deforestation action on areas greater than 50ha (10ha in sensitive areas). PROF, in several regions (Alto Minho, Baixo Minho, Barroso e Padrela, Nordeste Transmontano), also define a maximum threshold for clear cutting of 10ha.

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

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

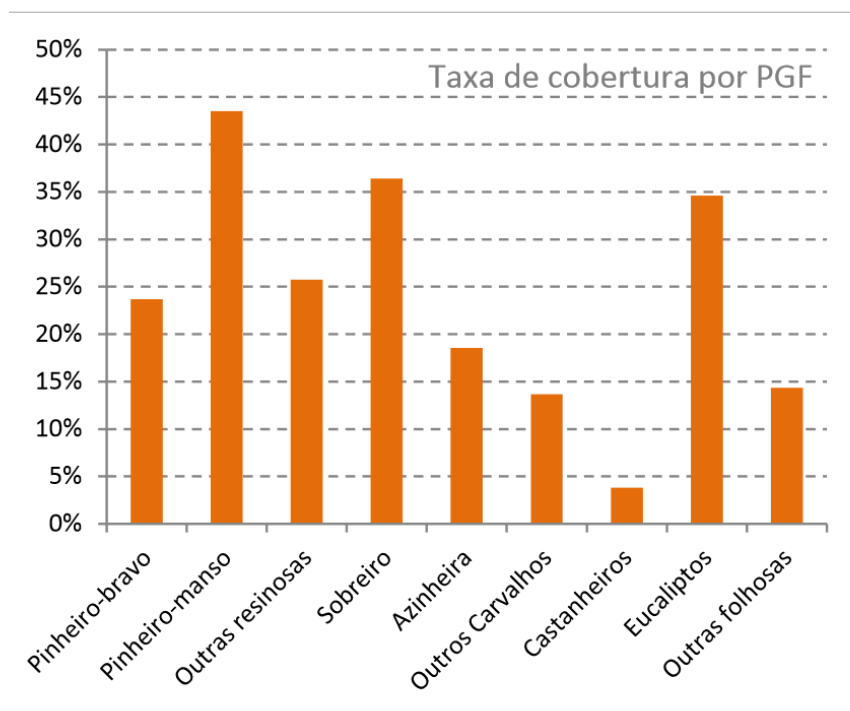
In the case of river basins, information relating to the classification of flood plains, areas threatened by floods and other relevant information can be partially obtained by consulting areas included in the National Ecologic Reserve (REN). River basin plans (PGBH) also contain relevant information,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

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

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

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

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



In the National Strategy for Forests – revision of 2015, one defined an objective in which 100% of the forest area managed by ICNF shall have an approved PGF.

In the case of community managed forests (Baldios) an approved PUB (specific FMP for this type of management) is in place on 60% of the total area.

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

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 on the importance of a responsible forest management. Updated information is not yet available, but it is considered reasonable to expect that the area under an approved PGF has increased since 2013.

Finally, during the revision process of the Regional Forest Plans [PROF] which started in 2017, several drafts for specific regions were put to public consultation, enabling the identification of a common trend consisting of the reduction of the minimum area threshold to enforce the need to have an approved PGF and also the establishment of a maximum area threshold for continuous clear cuts and afforestation with some species.

**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:

- This possibility is temporary, as the number of approved management plans has increased significantly in the past decade;
- Such risks have a limited impact on forest resources as they are not directly related to forest harvesting;
- There is national legislation that includes several specific mandatory operational rules comprising the protection of species, protection of soil, or the prevention of forest fires as well as municipal and other land use plans that have to be taken into account.

Specified risk is considered for areas without approved FMP.



Means of Verification	<ul style="list-style-type: none"> <li>• Approved EIA when applicable.</li> <li>• Approved Forest Management Plan when applicable</li> <li>• Records of BPs' field inspections</li> <li>• BP's monitoring records</li> <li>• BP's best forest management practices documents</li> <li>• Regional Forest Plan</li> </ul>
Evidence Reviewed	<ul style="list-style-type: none"> <li>• EIA legislation (national and regional): <a href="https://www.eia.es/legislacion/">https://www.eia.es/legislacion/</a></li> <li>• Guides and directives for environmental assessment: <a href="https://www.miteco.gob.es/es/calidad-y-evaluacion-ambiental/temas/default.aspx">https://www.miteco.gob.es/es/calidad-y-evaluacion-ambiental/temas/default.aspx</a></li> </ul>
Risk Rating	<input type="checkbox"/> <b>Low Risk</b> <input checked="" type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	<p>In case no forest plan is available (no PROF, PGF ZIF, PUB, SNAC, as well as no PEFC or FSC certification), or a plan is available but does not apply to a small holder, an additional assessment of environmental impacts is made and recorded before harvest. Special attention is given to plots smaller than the minimum threshold for the mandatory Forest Management Plan (PROF) and outside the SNAC.</p> <p>Before harvesting operations, the plot could be visited and evaluated, by BSL or its suppliers:</p> <ul style="list-style-type: none"> <li>• The possible economical, ecological and social impact of the forest operations, including its surroundings. Harvesting plans can be changed to avoid negative impacts;</li> <li>• Was the forest management conform the law in the recent past (has the forest been cleaned according to the law in the past);</li> <li>• Specific Plans for Forest Intervention (PEIF) are studied for 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);</li> <li>• Potential impacts of operations on ecosystems and biodiversity are identified. Impacts inside and outside the area of operation are considered, for example downstream;</li> <li>• Impacts are monitored and monitoring results are used to improve operational practices.</li> </ul> <p>Indicators 2.2.2, 2.2.3, 2.2.4, 2.2.6, and 2.4.2 include relevant management measures which are checked.</p>

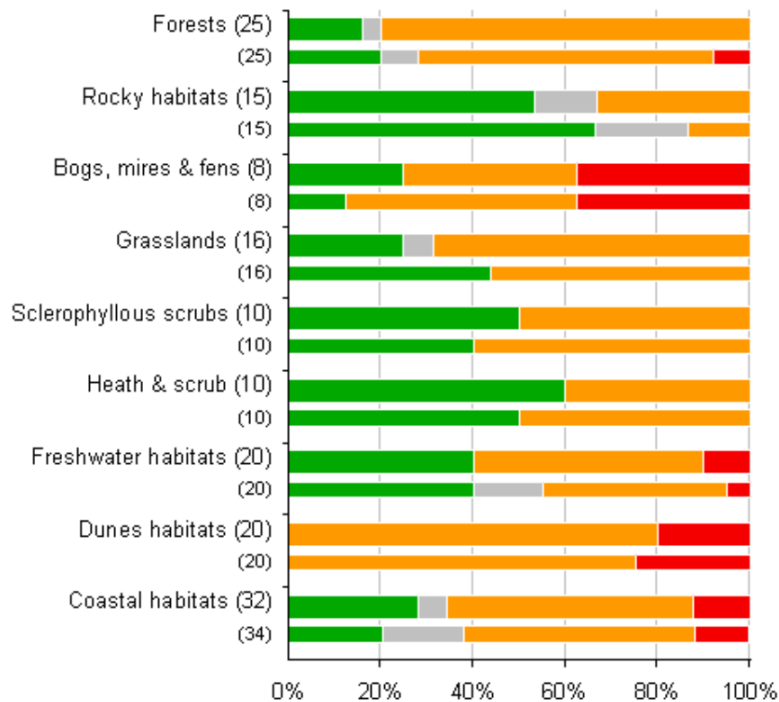
	Indicator
2.2.2	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b).
Finding	<p>National Forest Strategy (2015) states (chapter 2.2.5): “The susceptibility to desertification, which in terms of the Convention is defined by the aridity index threshold and, in particular in Portugal, corresponds to the 'Semi-arid' and 'dry sub-humid' classes, covers 58% of the mainland in the last three decades (1980/2010) and 63% in the last decade (2000/2010) (below). More than 60% of the national forest area estimated by IFN6 is included in areas susceptible to desertification including 100% of holm oak area, 99% of the area of cork oak, 98% of Pinus Pinea and 100% of the carob tree.</p> <p>Still from the same chapter of the National Forest Strategy: “It should also be noted that in the last decade there has been a significantly positive trend on the recovery of the productive capacity of Portuguese soils – in 22% of the mainland area– thus a regression in the desertification trends, including, in this scope, 5% of degraded areas, 9% of areas under production and 6% of naturalized areas, on a large extent related to new afforestation, since more than 90% of new afforestation interventions were carried out in areas susceptible to desertification (data from IFN5).”</p> <p>Holm oak, cork oak and stone pine settlements comprise trees with different ages and sizes which represent a major asset for the control of erosion, mainly in the southern region of Portugal. Since these tree species aren't used primarily for timber production, their continuous maintenance until decay being even common, added to the fact that the areas of stone pine and cork oak are increasing in Portugal, a positive trend to control soil degradation is visible. Interventions in settlements of these species occur on a relatively long time frame and, therefore, plants play an important role on controlling soil erosion.</p> <div data-bbox="746 1160 1141 1966" data-label="Figure"> <p><b>Legenda</b></p> <ul style="list-style-type: none"> <li>1 - Baixa</li> <li>2 - Moderada</li> <li>3 - Elevada</li> <li>4 - Muito Elevada</li> </ul> <p>PANCD 2014  Fonte: IDRHa-EAN/DISMED 2003  in Rosário 2004;  DOT 2016: CAOP</p> <p>0 15 30 60 Kilometers</p> </div> <p>Figure 3 Soil susceptibility to desertification [ICNF]</p>

	<p>ICNF report “Forest adaptation to climate change” (2013) 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.”</p> <p>Madeira, M., in its study , based on 30 years of monitoring, sampling and analysing activities that "forest residues could be used in energy production, since the site (soil) presents sufficient resilience to nutrient removal...". In the other two referenced studies , direct relationship between biomass removal and degradation of soil quality is not achieved. Both authors put it as a hypothesis, lacking a longer-term assessment, as Madeira, M. did as a result of its 30 years study.</p> <p>Law No. 31/2014 , May 30<sup>th</sup>, defines the general basis for the public policy on soils, territory planning and urbanism and sets a goal of enhancing the potential of agricultural, forestry and forest areas, among other broader objectives. It sets, as the objective of territory planning: “The preservation of soils with potential for agriculture, livestock or forestry, nature conservation, tourism and leisure, the production of renewable energies or the exploitation of geological resources in such a way that the allocation of such soils to other uses is restricted to situations where it is effectively needed and is duly proven”.</p> <p>Law No.33/96, August 17<sup>th</sup> – Base Law for Forest Policy determines that the national forestry policy pursues the objective of "... ensuring the fundamental role of forests in regulating <u>water resources</u>, <u>soil conservation</u> and air quality and combating desertification ...".</p> <p>Forest Regime , established in 1901 also defines “For the sake of the public, the forest regime shall be subordinated not only to lands which must be destined for the creation, exploitation and conservation of forest wealth, from the point of view of the national economy, but also those for which the afforestation is necessary for the good conservation of waters and safeguard of the várzeas [floodplains], as well as for the valorisation of ridges, moorlands and arid plains and benefit of the climate, or for the <u>fixation and conservation of the soil</u>, in the mountains, and the sands, in the maritime coast.” Under Forest Regime, there are several areas, public and private, that have been subject of interventions in the past century and are still maintained due to their importance regarding the objectives established in the original document. The following link shares a map of these areas: <a href="http://www.icnf.pt/portal/florestas/gf/regflo/resource/img/map-mnac-per-flor">http://www.icnf.pt/portal/florestas/gf/regflo/resource/img/map-mnac-per-flor</a></p> <p>Considering the information reviewed and despite the positive trends verified in the latest assessments on soil quality, the risk evaluation for this indicator is assessed as <u>specified</u>.</p>
<p>Means of Verification</p>	<ul style="list-style-type: none"> <li>• Best Management Practices</li> <li>• Records of BP’s field inspections</li> <li>• Assessment at an operational level of measures designed to minimise impacts on the values identified</li> <li>• Erosion and desertification programs and maps</li> <li>• Approved Forest Management Plan</li> </ul>
<p>Evidence Reviewed</p>	<ul style="list-style-type: none"> <li>• <u>Susceptible areas to desertification map:</u> <a href="http://www.icnf.pt/portal/naturaclases/ei/uncccd-PT/pancd/o-pancd-2014-2020/pdr-2020-areas-susceptiveis-e-nao-susceptiveis-a-desertificacao">http://www.icnf.pt/portal/naturaclases/ei/uncccd-PT/pancd/o-pancd-2014-2020/pdr-2020-areas-susceptiveis-e-nao-susceptiveis-a-desertificacao</a></li> <li>• ICNF <a href="http://www.icnf.pt/portal/florestas/dfci/relat/raa/resource/ficheiros/ree2012/rel-recup-inc-catraia-set-v5">http://www.icnf.pt/portal/florestas/dfci/relat/raa/resource/ficheiros/ree2012/rel-recup-inc-catraia-set-v5</a></li> <li>• PANCD <a href="https://dre.pt/application/file/65985917">https://dre.pt/application/file/65985917</a></li> <li>• Reserva Ecológica Nacional: <a href="https://dre.pt/application/dir/pdf1sdip/2012/11/21200/0630806346.pdf">https://dre.pt/application/dir/pdf1sdip/2012/11/21200/0630806346.pdf</a></li> <li>• Kirkby, M.J., Jones, R.J.A., et all (2004). Pan-European Soil Erosion Risk Assessment: The PESERA Map, Version 1 October 2003. Explanation of Special Publication Ispra 2004 No.73 (S.P.I.04.73) . European Soil Bureau Research Report No.16, EUR 21176, 18pp. and 1 map in ISO B1 format. Office for Official Publications of the European Communities, Luxembourg. European Soil Portal, 2013, <a href="http://eusoils.jrc.ec.europa.eu/ESDB_Archive/eusoils_docs/esb_rr/n16_ThePeseraMapBkLet52.pdf">http://eusoils.jrc.ec.europa.eu/ESDB_Archive/eusoils_docs/esb_rr/n16_ThePeseraMapBkLet52.pdf</a></li> </ul>

	<ul style="list-style-type: none"> <li>• <a href="http://www.icnf.pt/portal/florestas/gf/documentos-tecnicos/resource/doc/Boas-Praticas-Florestais.pdf">Good Forest Practices</a> <a href="http://www.icnf.pt/portal/florestas/gf/documentos-tecnicos/resource/doc/Boas-Praticas-Florestais.pdf">http://www.icnf.pt/portal/florestas/gf/documentos-tecnicos/resource/doc/Boas-Praticas-Florestais.pdf</a></li> <li>• LEAF: Epic WebGis Portugal: <a href="http://epic-webgis-portugal.isa.ulisboa.pt/maps/epic?format=image/png;%20mode=8bit&amp;startExtent=-1523000,4400000,-143668,5180000">http://epic-webgis-portugal.isa.ulisboa.pt/maps/epic?format=image/png;%20mode=8bit&amp;startExtent=-1523000,4400000,-143668,5180000</a></li> <li>• 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, <a href="http://www.scielo.mec.pt/pdf/rca/v32n2/v32n2a15.pdf">http://www.scielo.mec.pt/pdf/rca/v32n2/v32n2a15.pdf</a></li> <li>• Madeira, M. (2015) Thirty years of research on soil quality in forest systems under Mediterranean conditions. Trends and future. <a href="http://www.repository.utl.pt/bitstream/10400.5/92777/1/REP-M.Madeira-Spanish%20j.S.C..pdf">http://www.repository.utl.pt/bitstream/10400.5/92777/1/REP-M.Madeira-Spanish%20j.S.C..pdf</a></li> <li>• Magalhães, M., Cameira M., Pato, Santos R. &amp; Bandeira, J (2011)</li> <li>• Residual forest biomass: effects of removal on soil quality <a href="http://www.scielo.mec.pt/scielo.php?script=sci_arttext&amp;pid=S0871-018X2011000200019">http://www.scielo.mec.pt/scielo.php?script=sci_arttext&amp;pid=S0871-018X2011000200019</a></li> <li>• Practical Guide for Interventions on Sensitive Areas, Forestis, 2007, <a href="http://forestis.pt/forestis/multimedia/File/Relatorio_Proj/Guia_Areas_Riscos.pdf">http://forestis.pt/forestis/multimedia/File/Relatorio_Proj/Guia_Areas_Riscos.pdf</a></li> </ul>
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	<p>Before harvesting operations commence the plot is evaluated. Manual of good practices is implemented.</p> <p>Best forestry practices apply:</p> <ul style="list-style-type: none"> <li>• Were needed, considering the soil and groundwater level, only selective cuttings and small clear cuts of maximally 5 ha are planned;</li> <li>• Regeneration focusses on tree species that maintain or improve soil quality;</li> <li>• Leave nutrients in the forests, mainly the green fraction of forest residues less or equal to 3 cm (on the other hand other forest residues need to be cleared to prevent forest fires.</li> <li>• Do not operate near-water areas.</li> <li>• Fertilization of the ground, when needed and possible.</li> </ul> <p>On dry locations selective cuttings are often preferable, because the ground gets less direct impact of the sun and the forest can maintain soil quality and regenerate naturally. Poor soil quality can lead to erosion and other problems. Therefore, this indicator is related to indicator 2.2.6.</p>

	Indicator
2.2.3	The Biomass Producer has implemented appropriate control systems and procedures to ensure that key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).
Finding	<p>Most important forest areas with high concentration of nature conservation values have been identified and designated as classified or protected areas at national and/or EU level (Natura 2000 sites) as described in indicator 2.1.1 and 2.1.2.</p> <p><a href="#">National summary of the implementation of the Habitats Directive (2007-2012)</a> provides the graphs below, showing the comparison between the conservation status of habitats within the timeframe of the last two Habitats directive reports, 2001 to 2006 and 2007 to 2012.</p>

## Habitats



Conservation status of habitats in biogeographical and marine regions

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

The 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 by 2020 – the country is implementing several initiatives directed to each Target, which are described in detail in this report, however, several issues are identified that need to be addressed over the next years, such as improvements on the:

- implementation of strategic guidelines namely the National Strategy for Nature and Biodiversity Conservation;
- integration of biodiversity issues in the different sectors and policies;
- classification, inventory, ecological characterization and monitoring of biodiversity;
- engagement of the private sector,
- biodiversity valuation process and its integration on public accounting,
- management efficiency of the conservation status of threatened species (including ex situ),
- control and elimination of exotic invasive species,
- habitat restoration,
- enforcement actions related to crimes against biodiversity and
- promotion of active participation of civil society in biodiversity issues.

By analysing this report, it can be seen that Portugal has taken several measures to achieve CBD's goals, concluding from the need for a greater integration of biodiversity issues in different sectors and policies and the greater involvement of the private sector in this area. The table below shows the priority habitats listed in the Habitats Directive Report, in which forestry activities have an impact. Those priority habitats were targeted with LIFE Projects. [FSC-NRA-PT V1-0]

	Code_habitat	R_Biog	Global evaluation	Threats (forestry scope)	Management guidance (forestry scope)
	2250	MED	U1	Under-covered vegetation control	Forest management oriented for habitat conservation; Promote and actively encourage forest management including objectives for under-covered conservation of Juniperus; Promote recovery, revegetation and bio-remediation plans to restore Juniperus in their potential area of occurrence, where it has been altered or extinct.
	2260	MED	U1	Destruction by vegetation control associated with pine forest management practices	Developing forest management practices by combining fire protection and habitat preservation, for example, vegetation control only on patches or firebreaks;  Regulate the changes of land use in the habitat area, prohibiting harmful activities on the vegetation or changes in the land use in dunes with no vegetation.
	3170	MED	U2	Destruction by plantation	Avoid plantation
	5210	MED	U1	Afforestation; Fires, in situations where Juniperus has a significant proportion of mosaic with Cistus species; Non-selective vegetation control for fire prevention; Vegetation control near streams; Forestation resulting in substantial alteration of structure or complete disappearance of habitat.	Interdict afforestation in the habitat area; Regulate shrub cutting (vegetation control) in cork areas near or in mosaic with Juniperus species; Control fire risk without destroying vegetation (firebreaks, selective vegetation control); Restore forest areas with potential for the Juniperus species.

	5230	ATL MED	U1	Silvicultural expansion; fires; Laurus nobilis leaf cutting.	Condition silvicultural expansion; Stabilization of ecological succession; Reduction of fire hazards; Regulate Laurus nobilis leaf cutting; Erradication of invasive alien plants.
	6310	MED	U1	Absence of regeneration, functional stress or disruption of the system itself; Pests and diseases; Lack of interest of economic operators; Afforestation with species not suitable in cork areas; Fire	Promote and manage natural regeneration; manage grazing; cork and holm oak plantations, inf necessary.
	6510	ATL MED	U1	Land use changes	Hedge maintenance in the neighbourhood.
	9230	ATL MED	U1	Fire; Clear cut; afforestation	Restoration of degraded oak lands, in particular through the management of natural regeneration, grazing elimination and reduction of fire risk.
	9240	MED	U1	Change of land use. Low economic value and existence of more profitable land uses such as agriculture or of fast-growing forest plantations. Unsuitable forest planning. Fire. Over-harvesting.	Avoid land use changes. Strengthen supervision on residue disposal. Minimize harvesting, under-covered disturbances. Removal of exotic species. Selective harvesting. Creation of a seed bank. Regeneration monitoring. Preserve shrub hedges. Promote afforestation. Forest mosaic maintenance. Potential ecosystem services.
	9260	MED	FV	Harvesting; diseases	Regulate harvesting; Control Phytophthora cinnamomi and chestnut cancer (Cryphonectria parasitica)

	9330	MED	U1	Land use changes. Unsuitable forest planning. Forest fires.	Restore marginal areas. Regulate land use changes. Maintain and promote habitat. Carry out measures to prevent fire risk. Supervision of waste disposal.
	9340	MED	U1	Land use changes. Grazing. Unsuitable forest planning. Fires	Restore of marginal areas. Regulate land use changes. Implement measures for fire prevention. Control of waste disposal. Active management of the habitat.
	9560	MED	U1	Fire	Reduce fire risk
	9580	ATL MED	U1	Fire; Harvesting and grazing	Harvesting planning. Reduce fire risk.
	91B0	MED	U1	Clear cut. Grazing. Harvesting for animal feeding. Replacement by fast-growing forest plantations.	Ecological succession management. Reduction of the competition under-covered vegetation. Harvesting planning. Control exotic species.
	92A0	MED	U1	Harvesting. Vegetation control in riparian areas.	Harvesting conditioning. Manual vegetation control and manual extraction of dead trees.
	7140	ATL MED	U2	Fire	Reduce fire risk
	7150	ATL MED	U2	Fire	Reduce fire risk
	<p>Reference should be made to the development of the Biodiversity Information and Monitoring of northern Portugal (SIMBioN), developed by the ICNB, IP, and by CIBIO, which had, among its objectives, to provide the ICNB, IP with a tool to support biodiversity management and contribute to scientific knowledge and public dissemination of biodiversity.</p> <p><b>Conclusion:</b></p> <p>It is important to highlight that, as stated before in indicators 2.1.1 and 2.1.2, forest operations are identified in the Habitats (2007-2012) Directive Implementation Report from Portugal to present a “high importance” threat (future) in 6 habitats and pressure (current) on 8 habits accounting for 3.8% and 5%, respectively, of the total assessments.</p> <p>The overall conservation status trends of habitats, as well as the number of attributes from which the conservation trends are unknown imposes the risk to be assessed as <u>specified</u> for the habitats identified as unfavourable where forest related activities present pressures and threats.</p>				
Means of Verification	<ul style="list-style-type: none"> <li>• Best Management Practices</li> <li>• Assessment at an operational level of measures designed to minimise impacts on the values identified</li> <li>• Erosion and desertification programs and maps</li> <li>• Checklist. Reports of field inspections. Monitoring results</li> </ul>				



	<ul style="list-style-type: none"> <li>Publicly available information on the protection of the identified values</li> </ul>
Evidence Reviewed	<ul style="list-style-type: none"> <li>Birds (2008-2012) and Habitats (2007-2012) Directive Implementation Reports, <a href="http://www2.icnf.pt/portal/pn/biodiversidade/rn2000/dir-ave-habit">http://www2.icnf.pt/portal/pn/biodiversidade/rn2000/dir-ave-habit</a></li> <li><a href="http://www.icnf.pt/portal/naturaclas/ei/cempa/pp-monit/pnmaai">http://www.icnf.pt/portal/naturaclas/ei/cempa/pp-monit/pnmaai</a></li> <li><a href="http://www.icnf.pt/portal/naturaclas/ei/projeto-de-estacoes-de-esforco-constante">http://www.icnf.pt/portal/naturaclas/ei/projeto-de-estacoes-de-esforco-constante</a> <a href="http://www.apaa.pt/peec/index.html">http://www.apaa.pt/peec/index.html</a></li> <li><a href="http://www.icnf.pt/portal/naturaclas/patrinatur/especies/mam/morc">http://www.icnf.pt/portal/naturaclas/patrinatur/especies/mam/morc</a> <a href="http://www.icnf.pt/portal/naturaclas/patrinatur/resource/docs/Mam/morc/prog-abri-sub1988-2012v3">http://www.icnf.pt/portal/naturaclas/patrinatur/resource/docs/Mam/morc/prog-abri-sub1988-2012v3</a></li> <li><a href="http://www.icnf.pt/portal/naturaclas/patrinatur/resource/docs/Mam/morc/morc-crit-aval-abrig">http://www.icnf.pt/portal/naturaclas/patrinatur/resource/docs/Mam/morc/morc-crit-aval-abrig</a></li> <li><a href="http://www.spea.pt/pt/estudo-e-conservacao/censos/censo-de-aves-comuns/">http://www.spea.pt/pt/estudo-e-conservacao/censos/censo-de-aves-comuns/</a></li> <li><a href="http://www.spea.pt/fotos/editor2/relatoriocac_2011.pdf">http://www.spea.pt/fotos/editor2/relatoriocac_2011.pdf</a></li> <li><a href="http://www.spea.pt/pt/participar/grupos-de-trabalho/aves-noturnas/monitorizacao/">http://www.spea.pt/pt/participar/grupos-de-trabalho/aves-noturnas/monitorizacao/</a></li> <li><a href="https://www.spea.pt/categoria-observacao/ibas-areas-importantes/">https://www.spea.pt/categoria-observacao/ibas-areas-importantes/</a></li> <li>INCF Birds Directive (2008-2012) article 12 PT Summary <a href="http://www.icnf.pt/portal/pn/biodiversidade/rn2000/dir-ave-habit/resource/doc/National_Summary_for_Article%2012%20_%20PT.pdf">http://www.icnf.pt/portal/pn/biodiversidade/rn2000/dir-ave-habit/resource/doc/National_Summary_for_Article%2012%20_%20PT.pdf</a></li> </ul>
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	<p>BSL prepares (publicly available) data on ecosystems and habitats (see above 2.1.1 on mapping and 2.1.2 on identifying and addressing potential threats). This information is given to all feedstock suppliers. Feedstock suppliers are trained and or informed to recognise key ecosystems and habitats.</p> <p>Steps in risk mitigation:</p> <ul style="list-style-type: none"> <li>Training, assessing and/or information to suppliers.</li> <li>Desk assessment (before harvesting operations commence) of key ecosystems and habitats: <ul style="list-style-type: none"> <li>All classified areas: <ul style="list-style-type: none"> <li>National Network of Protected Areas;</li> <li>Special Areas of Conservation (SAC);</li> <li>Special Protection Areas (SPA);</li> <li>Ramsar sites;</li> <li>Important Bird Areas (IBA);</li> <li>Priority habitats in Natura 2000 network;</li> <li>Areas where threatened species occur;</li> <li>Areas where endemic species of the Iberian Peninsula occur;</li> <li>Areas where seasonal concentrations of species occur;</li> <li>Large landscape level forests;</li> <li>Important areas for watershed protection;</li> </ul> </li> </ul> </li> <li>Forest plot inspection prior harvesting;</li> <li>Mapping of the harvesting plot, indicating key ecosystems, habitats and objects of importance to biodiversity; making photos prior to harvesting.</li> <li>Best forestry practices, including measures to conserve and increase biodiversity (for example, standing dead wood).</li> <li>Change of operational plan, if necessary.</li> </ul>

	<b>Indicator</b>
<b>2.2.4</b>	The Biomass Producer has implemented appropriate control systems and procedures to ensure that biodiversity is protected (CPET S5b).
<b>Finding</b>	<p>Relevant biodiversity attributes are identified in indicator 2.1.1, specifically on HCV1. The threats are described in indicator 2.1.2. Indicators 2.1.1, 2.1.2, 2.2.3 and 2.2.4 are complementary and this character shall be taken into account during the assessment.</p> <p><a href="#">National summary of the implementation of the Habitats Directive (2007-2012)</a> provides the graphs below, showing the comparison between the conservation status of species within the timeframe of the last two Habitats directive reports, 2001 to 2006 and 2007 to 2012.</p> <div style="text-align: center;"> <p><b>Species</b></p> <p>Conservation status of <b>species</b> in biogeographical and marine regions</p> <p><b>Note:</b> wide bar corresponds to the 2007-2012 reporting period, and the narrow bar to the 2001-2006 reporting period. The number in brackets corresponds to the number of biogeographical assessments in the category.</p> </div> <p>Forestry presents a “high importance” threat to 7.7% of the species assessed and puts pressure on 9.6% of the total 426 species considered.</p> <p>Regarding the monitoring programs and systematic monitoring of species, the Habitats Directive requires periodic assessment of the conservation status of many relevant habitats. The Planning and Management Plans of the Protected Areas and Classified Areas of the Natura2000 network may also integrate a monitoring program for a periodic evaluation of the implementation of the proposed measures and actions. In addition, Environmental Impact Assessment processes involve the monitoring of key environmental descriptors (namely, fauna, flora and vegetation) potentially affected by project implementation.</p> <p>A number of monitoring programs have been implemented for certain species as representatives of a given taxonomic group that may integrate the set of indicators of progress achieved towards a significant reduction in the rate of biodiversity loss.</p> <p>ICNF coordinates several long-term monitoring programs addressed to several species and groups of birds:</p> <ul style="list-style-type: none"> <li>National program for monitoring of winter waterfowl, for species highly dependent on wetlands. This program has been in force since 1976. This project comprises the annual assessment of the population and distribution of Anseriformes and Gruiformes species.</li> </ul>

- Stations of constant effort project. Has the objective of monitoring the population alterations of Passerines e quasi-Passerines species with wide distribution.

Specific monitoring actions at regional level:

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

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

- Action Plan for the Conservation of the Iberian Lynx The Action Plan defines strategies for action, and its ultimate goal is to enable the conservation of the species in the national territory, reversing the process of continued decline of populations and recovering the cores of the species. In addition, it establishes a strategic model for the implementation of the breeding program in captivity, the recovery and maintenance of the favourable habitat, and the reintroduction of specimens of the species in suitable territories. Among other aspects, it emphasizes the importance of agricultural, forestry and game management to create the right conditions so that this essential objective can be successfully achieved. The Action Plan results from the directives of action of the National Strategy for the Conservation of Nature and Biodiversity and is the result of a long process of preparation that included a procedure of public auscultation.
- Monitoring program for cave species of bats in progress since 1987. Annually, the most important winter and maternity shelters are visited at national level, and an annual estimate is made of the actual numbers present. A recent analysis of data collected between 1988 and 2012 includes population trends of seven species calculated using TRIM software.

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

- 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). 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

	<p>of results and support to the network of volunteers, which has made unfeasible the provision of Common Bird Indexes (IACZA, IACZF, etc.) to the public administration. These indexes have been published until 2009. After 2009, only CAC reports are available, which only contain information disaggregated by species;</p> <ul style="list-style-type: none"> <li>• CANAN (Bird counts at Christmas and New Year), monitoring of population trends of wintering bird species in Portugal's agricultural fields;</li> <li>• NOCTUA-Portugal, monitoring of nocturnal birds;</li> <li>• RAM, network of observation of birds and marine mammals;</li> <li>• Project Arenaria, monitoring the distribution and abundance of birds on the beaches and coasts of Portugal;</li> <li>• Monitoring scheme of the bustard (<i>Otis tarda</i>);</li> <li>• Monitoring scheme of the imperial eagle (<i>Aquila adalberti</i>).</li> <li>• Monitoring the mortality of vertebrates by trampling on roads in Portugal.</li> </ul> <p>Since 2010, a joint project of the University of Lisbon and Estradas de Portugal, S.A., with the objective of minimizing road mortality and improving the permeability of routes through the identification of points of high mortality and improvement of the hydraulic passages for the passage of animals.</p> <p>As a contribution to the establishment of a reference framework for species, the most important are the Portuguese Atlas of Bats, the Winter Migratory Birds, the Atlas of Nesting Birds in the Madeira Archipelago, the Atlas of Birds (In prep.) And the 6<sup>th</sup> volume of the Madeira Biodiversity collection: Evaluation and Conservation of the native terrestrial vertebrates of the Madeira and Selvagens Archipelagos - Reptiles and Mammals. The project of the Atlas of Bats of Portugal (mainland), which involved about 150 volunteers, had as main objectives to map the current distribution of the 25 species of bats with known occurrence in mainland Portugal, to fill a database to make this information available to stakeholders and, together with the 2011-2012 Year of the Bat campaign, mobilize and encourage practitioners in this area to educate the public about the importance of bats in ecosystems.</p> <p>Based on the evidences presented in indicators 2.1.1, 2.1.2 and 2.2.3 it is possible to conclude that forestry activities and feedstock supply represent specified risk for biodiversity attributes in Portugal.</p>
<p>Means of Verification</p>	<ul style="list-style-type: none"> <li>• Best Management Practices</li> <li>• Assessment at an operational level of measures designed to minimise impacts on the values identified</li> <li>• Erosion and desertification programs and maps</li> <li>• Reports of field inspections. Monitoring results</li> <li>• Publicly available information on the protection of the identified values</li> </ul>
<p>Evidence Reviewed</p>	<ul style="list-style-type: none"> <li>• Birds (2008-2012) and Habitats (2007-2012) Directive Implementation Reports, <a href="http://www2.icnf.pt/portal/pn/biodiversidade/rn2000/dir-ave-habit">http://www2.icnf.pt/portal/pn/biodiversidade/rn2000/dir-ave-habit</a></li> <li>• <a href="http://www.icnf.pt/portal/naturaclas/ei/cempa/pp-monit/pnmaai">http://www.icnf.pt/portal/naturaclas/ei/cempa/pp-monit/pnmaai</a></li> <li>• <a href="http://www.icnf.pt/portal/naturaclas/ei/projeto-de-estacoes-de-esforco-constante">http://www.icnf.pt/portal/naturaclas/ei/projeto-de-estacoes-de-esforco-constante</a> <a href="http://www.apaa.pt/peec/index.html">http://www.apaa.pt/peec/index.html</a></li> <li>• <a href="http://www.icnf.pt/portal/naturaclas/patrinatur/especies/mam/morc">_http://www.icnf.pt/portal/naturaclas/patrinatur/especies/mam/morc</a> <a href="http://www.icnf.pt/portal/naturaclas/patrinatur/resource/docs/Mam/morc/prog-abri-sub1988-2012v3">http://www.icnf.pt/portal/naturaclas/patrinatur/resource/docs/Mam/morc/prog-abri-sub1988-2012v3</a></li> <li>• <a href="http://www.icnf.pt/portal/naturaclas/patrinatur/resource/docs/Mam/morc/morc-crit-aval-abrig">http://www.icnf.pt/portal/naturaclas/patrinatur/resource/docs/Mam/morc/morc-crit-aval-abrig</a></li> <li>• <a href="https://www.spea.pt/categoria-observacao/ibas-areas-importantes/">https://www.spea.pt/categoria-observacao/ibas-areas-importantes/</a></li> <li>• INCF Birds Directive (2008-2012) article 12 PT Summary <a href="http://www.icnf.pt/portal/pn/biodiversidade/rn2000/dir-ave-habit/resource/doc/National_Summary_for_Article%2012%20_%20PT.pdf">http://www.icnf.pt/portal/pn/biodiversidade/rn2000/dir-ave-habit/resource/doc/National_Summary_for_Article%2012%20_%20PT.pdf</a></li> </ul>

	<ul style="list-style-type: none"> <li>• <a href="http://www.habeas-med.org/webgis/lizmap/www/index.php/view/map/?repository=habeas&amp;project=habeas_2_0">http://www.habeas-med.org/webgis/lizmap/www/index.php/view/map/?repository=habeas&amp;project=habeas_2_0</a></li> </ul>
Risk Rating	<input type="checkbox"/> <b>Low Risk</b> <input checked="" type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	<p>BSL prepares (publicly available) data on ecosystems and habitats (see above 2.1.1 on mapping and 2.1.2 on identifying and addressing potential threats). This information is given to all feedstock suppliers. Feedstock suppliers are trained and /or informed to recognise key ecosystems and habitats.</p> <p>Steps in risk mitigation:</p> <ul style="list-style-type: none"> <li>• Training, assessing and/or information to suppliers;</li> <li>• Desk assessment (before harvesting operations commence) of key ecosystems and habitats: <ul style="list-style-type: none"> <li>○ All classified areas: <ul style="list-style-type: none"> <li>○ National Network of Protected Areas;</li> <li>○ Special Areas of Conservation (SAC);</li> <li>○ Special Protection Areas (SPA);</li> <li>○ Ramsar sites;</li> <li>○ Important Bird Areas (IBA);</li> <li>○ Priority habitats in Natura 2000 network;</li> <li>○ Areas where threatened species occur;</li> <li>○ Areas where endemic species of the Iberian Peninsula occur;</li> <li>○ Areas where seasonal concentrations of species occur;</li> <li>○ Large landscape level forests;</li> <li>○ Important areas for watershed protection;</li> </ul> </li> </ul> </li> <li>• Forest plot inspection prior harvesting;</li> <li>• Mapping of the harvesting plot, indicating key ecosystems, habitats and objects of importance to biodiversity; making photos prior to harvesting.</li> <li>• Best forestry practices, including measures to conserve and increase biodiversity (for example, standing dead wood.</li> <li>• Change of operational plan, if necessary.</li> </ul>

	Indicator
2.2.5	The Biomass Producer has implemented appropriate control systems and procedures for verifying that the process of residue removal minimises harm to ecosystems.
Finding	<p>In Portugal forest residue removal from forests is regulated so loggers and owners have some legal obligations, related with both fire and phytosanitary policies. These obligations are dependent on species, areas, seasons and regions.</p> <p>Depending on forestry procedures and forest models, the solutions adopted about forest residues are:</p> <ul style="list-style-type: none"> <li>• integrating them in the soil;</li> <li>• remove them, or</li> <li>• burn them in the appropriate season.</li> </ul> <p>All of these operations include advantages and disadvantages according to the focus of the overview. In the case of removal, it is always considered a 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.</p> <p>For soil matters related with residue removal see indicator 2.2.2</p> <p>Based on the available information, this indicator is considered low risk</p>
Means of Verification	<ul style="list-style-type: none"> <li>• Best Management Practices;</li> <li>• Records of field inspections;</li> </ul>

	<ul style="list-style-type: none"> <li>Assessment at operational level of measures designed to minimise impacts on the values identified</li> </ul>
Evidence Reviewed	<p>National System for Forest Fire Prevention: <a href="https://dre.pt/application/dir/pdf1sdip/2006/06/123A00/45864599.pdf">https://dre.pt/application/dir/pdf1sdip/2006/06/123A00/45864599.pdf</a></p> <p>Good Forest Practices <a href="http://www.icnf.pt/portal/florestas/gf/documentos-tecnicos/resource/doc/Boas-Praticas-Florestais.pdf">http://www.icnf.pt/portal/florestas/gf/documentos-tecnicos/resource/doc/Boas-Praticas-Florestais.pdf</a></p>
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
<b>2.2.6</b>	<p>The Biomass Producer has implemented appropriate control systems and procedures to verify that negative impacts on ground water, surface water and water downstream from forest management are minimised (CPET S5b).</p>
Finding	<p>Forest resources have a positive impact on water resources, compared with other land uses, such as agriculture.</p> <p>In the case of river basins, information related to the classification of flood plains, areas threatened by floods and other relevant information can be partially obtained by consulting areas included in the National Ecologic Reserve (REN). River basin plans (PGBH) also contain relevant information, as do PROFs, especially where they refer to protection forests. For information about erosion control it is essential to consult documentation relevant to the risk of erosion. Some of this information is contained in the REN, which identifies, on a scale of 1:25.000, areas at high risk of erosion, as well as zones of instability.</p> <p>National Ecological Reserve is a territory classification of sensitive areas for “ecosystem services” where water issues are addressed, and some restrictions are in place to prevent negative impacts in slopes, valleys and other sensitive situations. All forest projects and plans must comply with this regulation, and they should be in place, for example in projected soil preparation techniques.</p> <p>The ICNF Handbook for forest best practices defines: “In the areas surrounding the water lines the risk of erosion is often very high, since these are areas of concentration of rainwater runoff. In these bands (with a minimum width of 10 metres on either side, as stated in the legal definitions and conditions of legal limits (Decree-Law No. 468/71, of 5th 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.”</p> <p>Decree-law No. 173/88, May 17th establishes the definition of premature cutting operations on Eucalyptus and <i>Pinus Pinaster</i> settlements and defines limitations for these operations.</p> <p>Decree-law No. 139/89, April 28th establishes the legal framework for the protection of natural slope, arable soil and vegetation cover.</p> <p>Decree-law No.151-B, July 19th defines the obligation to perform an Environmental Impact Assessment on every afforestation and reforestation occurring in areas ≥ 350ha (70ha in 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 in areas ≥ 50ha (10ha in sensitive areas). PROF in northern regions (21% of the territory) defines a maximum area for clear cuttings of 10ha.</p> <p>Coelho, Inocência identifies typical distribution of the Forest private property in several regions of the Portuguese mainland where only Alentejo and Ribatejo regions show an average property size above 7ha per owner and more than 50% of the properties with more than 100ha. For properties with dimensions above 100ha it is mandatory to prepare and</p>

	<p>submit a Forest Management Plan to be analysed by ICNF which comprises strategies to minimize impact on water resources created by forest operations.</p> <p>The forest operations occurring in other regions of the country, mainly above the Tagus river, where more than 50% of the properties have less than 10ha and average sizes ranging from 1.46 to 2.83ha per owner, will unlikely spread across areas greater than 10h, due to the fragmentation of the rural real estate.</p> <p>At a regional level, Municipal Forest Regulations (see references below) define the permitted operations near water lines considering the potential hazard of erosion, fire propagation and water displacement, namely:</p> <ul style="list-style-type: none"> <li>• Species permitted near water lines and riparian galleries, excluding fast growing species from afforestation and reforestation activities (ordinance No.528/89, July 11th)</li> <li>• Mandatory low density of settlements on afforested and reforested areas</li> <li>• Advice on the species considered as appropriate to a defined location;</li> <li>• Use of heavy machinery limited to no less than 10 metres from the water line</li> <li>• Clear cutting operations and management activities must be previously authorized by the municipality.</li> </ul> <p>There are forestry best practices handbooks for operations occurring on river basins and forest areas near dams easily accessible online and through forest owners' associations, as well as a strong legal framework regarding operations within the mentioned areas. At the same time, North of the Tagus river, where the implementation of Forest Management Plans is not as visible as in the southern region of Portugal, the average property size is considerably small, which reduces the risk for this indicator.</p> <p>So it is considered there are specified risks that feedstock is sourced from forests when clear cuttings are done over a specific size area. This specific area is defined regionally by each Regional Forest Plan (PROF), as the maximum clearcutting area or the size of even aged monospecific forest stand.</p> <p>Taking a precautionary approach, specified risk is defined.</p>
<p>Means of Verification</p>	<ul style="list-style-type: none"> <li>• Best Management Practices;</li> <li>• Records of field inspections</li> </ul>
<p>Evidence Reviewed</p>	<ul style="list-style-type: none"> <li>• <a href="https://dre.pt/application/dir/pdf1sdip/1988/05/11400/20632064.pdf">https://dre.pt/application/dir/pdf1sdip/1988/05/11400/20632064.pdf</a></li> <li>• <a href="https://dre.pt/application/dir/pdf1sdip/1989/04/09800/17811782.pdf">https://dre.pt/application/dir/pdf1sdip/1989/04/09800/17811782.pdf</a></li> <li>• <a href="https://dre.pt/application/file/a/497960">https://dre.pt/application/file/a/497960</a></li> <li>• Water Law: Dec-Law No. 130/2012 22/06 <a href="https://dre.pt/application/dir/pdf1sdip/2012/06/12000/0310903139.pdf">https://dre.pt/application/dir/pdf1sdip/2012/06/12000/0310903139.pdf</a></li> <li>• National Water Plan: <a href="http://www.apambiente.pt/?ref=16&amp;subref=7&amp;sub2ref=9&amp;sub3ref=833">http://www.apambiente.pt/?ref=16&amp;subref=7&amp;sub2ref=9&amp;sub3ref=833</a></li> <li>• Hydrographical basin Plans <a href="http://www.apambiente.pt/?ref=16&amp;subref=7&amp;sub2ref=9&amp;sub3ref=834#pgbh-tabela">http://www.apambiente.pt/?ref=16&amp;subref=7&amp;sub2ref=9&amp;sub3ref=834#pgbh-tabela</a></li> <li>• Ecological Reserve National Law: <a href="https://dre.pt/application/dir/pdf1sdip/2012/11/21200/0630806346.pdf">https://dre.pt/application/dir/pdf1sdip/2012/11/21200/0630806346.pdf</a></li> <li>• <a href="https://www.uc.pt/fluc/nicif/riscos/Documentacao/Territorium/T04_artg/T04_Artg10.pdf">https://www.uc.pt/fluc/nicif/riscos/Documentacao/Territorium/T04_artg/T04_Artg10.pdf</a></li> <li>• <a href="https://www.repository.utl.pt/bitstream/10400.5/1307/1/REP-Fabiao%2C%20A.-Madeira%20et%20al%202007.pdf">https://www.repository.utl.pt/bitstream/10400.5/1307/1/REP-Fabiao%2C%20A.-Madeira et al 2007.pdf</a></li> <li>• Strategic Guidance for Intervention on water courses, (Hydrographic Administration of the Centre Region) <a href="https://www.apambiente.pt/_zdata/Divulgacao/Projectos/agua/EstudoEstrategico/GuiaIntervencaoLinhasAguaARHC.pdf">https://www.apambiente.pt/_zdata/Divulgacao/Projectos/agua/EstudoEstrategico/GuiaIntervencaoLinhasAguaARHC.pdf</a></li> <li>• Practical Guide for Interventions on Sensitive Areas, Forestis, 2007, <a href="http://forestis.pt/forestis/multimedia/File/Relatorio_Proj/Guia_Areas_Riscos.pdf">http://forestis.pt/forestis/multimedia/File/Relatorio_Proj/Guia_Areas_Riscos.pdf</a></li> <li>• <a href="http://www.habeas-med.org/webgis/lizmap/www/index.php/view/map/?repository=habeas&amp;project=habeas_2_0">http://www.habeas-med.org/webgis/lizmap/www/index.php/view/map/?repository=habeas&amp;project=habeas_2_0</a></li> </ul>

	<ul style="list-style-type: none"> <li>Coelho, Inocência report (<a href="http://www.scielo.mec.pt/pdf/slu/v11n2/v11n2a05.pdf">http://www.scielo.mec.pt/pdf/slu/v11n2/v11n2a05.pdf</a>)</li> </ul>
Risk Rating	<input type="checkbox"/> <b>Low Risk</b> <input checked="" type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	<p>BSL monitors the harvesting operations of its feedstock suppliers. Best practices are required to comply with the SBE program requirements:</p> <ul style="list-style-type: none"> <li>Desk assessment (before harvesting operations commence) of Important areas for watershed protection: <ul style="list-style-type: none"> <li>Cork oak and holm oak areas located in areas with an aquifer recharge rate of over 175 mm/year</li> <li>Aquifers</li> </ul> </li> <li>The plots and the surroundings (hill slopes and streams) are inspected on: <ul style="list-style-type: none"> <li>Runoff problems (regarding the landscape, onsite and in the surroundings);</li> <li>Groundwater level problems (too high or too low);</li> <li>Protection of riversides and (lake) coastlines;</li> </ul> </li> <li>In areas vulnerable to water damage, the maximal contiguous clear cut area is 5 ha;</li> </ul> <p>Best forestry practices; Feedstock suppliers are trained to not contaminate ground water and to plan forest management operations that protect the soil, forest and surroundings from surface water runoff; Runoff of elements of fertilizers and pesticides into the surrounding environment</p>

	Indicator
2.2.7	The Biomass Producer has implemented appropriate control systems and procedures for verifying that air quality is not adversely affected by forest management activities.



Finding	<p>The greatest impacts on air quality in forests are caused by fires, which are not considered management activities. No reports have been published on relevant environmental damage related to forestry operations and harvesting.</p> <p>Neither of these two factors are a consequence of forestry harvesting operations and forest management activities.</p> <p>But, in the other hand, there are reports from the European Commission and NGOs that too little is being done with regard to air pollution control in Portugal. There have been law-suites, because plans to reduce Ozon are missing.</p> <p>The scope of the work carried out by a BSL, the impacts on air quality are caused by the emissions from the machinery used to complete the work. Therefore, the work is not continuous in just one zone, so the impact is intermittent. About this point, the most relevant issue it's a good maintenance of machinery, following the requirements of decree 144/2017, about the Technical test of vehicles (ITV), compulsory for all vehicles.</p> <p>In forestry works three main sources of atmospheric pollution have been identified:  1) Dust. To minimise the amount of dust produced by the works, it is necessary to proceed in moderation in those places where dust is generated.  2) Combustion gases from machinery and vehicles. To minimise the emission of gasses, the engines must be kept perfectly maintained and switched off when not in use. Machinery shall be reviewed in Vehicle Inspection Tests (ITV).  3) Incineration of forest waste.</p> <p>Therefore, BSL has defined procedures that aim to ensure that its forest machines are properly checked at regular intervals and the vehicles inspected. In the case of equipment of subcontractors, in use in the operations under its responsibility, BSL monitors compliance by subcontractors. Likewise, it informs and makes its suppliers aware of compliance. Therefore, the risk for this indicator is considered Low Risk.</p>
Means of Verification	<ul style="list-style-type: none"> <li>• Existing legal framework. Laws, regulations and control bodies</li> <li>• Manual of good practices</li> <li>• Contracts with suppliers</li> <li>• ITV documents (BP, subcontractors and suppliers)</li> </ul>
Evidence Reviewed	<ul style="list-style-type: none"> <li>• Environmental Laws: Law No. 19/14 of 14/04 artº10ºd) DL No.49/05, of 24/02 artº20º • DL 197/2005, of 8/11 artº 1º, No.3 b) and No.4,</li> <li>• Decree-Law No. 102/2010 of 23/09 <a href="https://dre.pt/application/dir/pdf1sdip/2010/09/18600/0417704205.pdf">https://dre.pt/application/dir/pdf1sdip/2010/09/18600/0417704205.pdf</a></li> <li>• NP EN 13525:2005+A2:2009</li> <li>• Decree num. 144/2017</li> <li>• ITV</li> </ul>
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
2.2.8	The Biomass Producer has implemented appropriate control systems and procedures for verifying that there is controlled and appropriate use of chemicals, and that Integrated Pest Management (IPM) is implemented wherever possible in forest management activities (CPET S5c).
Finding	<p>The national legal framework for the use of agrochemicals is <a href="#">Law No. 26/2013 from April 11<sup>th</sup></a> which applies to the Portuguese context of EU Directive No. 2009/128/CE, of 21/10 and it states:</p> <ul style="list-style-type: none"> <li>• Only distributing companies and sales outlets authorized by the Directorate-General for Food and Veterinary (DGAV) may carry out the activity of distribution or sale of phytopharmaceuticals;</li> <li>• Establishes the qualification requirements for the responsible technician for the trade of the chemical products;</li> <li>• Defines the minimum training required for the user and applicator of the phytopharmaceuticals;</li> <li>• Defines the good practices to reduce the negative impacts of the use of phytopharmaceuticals.</li> </ul> <p>The implementation of this law had a very positive impact on the use of agrochemicals and included the necessity of accreditation and records (quantities, disposals, etc.) for all the operators involved.</p> <p>The use of chemicals on Portuguese forests is not common and it is very restricted to a few cases because, among others, there are few homologated products applied to the most important phytosanitary forest plagues and diseases.</p> <p>Based on available information the requirements included in this indicator are considered low risk.</p>
Means of Verification	<ul style="list-style-type: none"> <li>• Existing legislation;</li> <li>• Level of enforcement;</li> <li>• Assessment at operational level of measures designed to minimize impacts on the values identified;</li> <li>• Monitoring records;</li> <li>• Interviewer contacts with staff involved</li> <li>• Records of chemicals deliveries, when applicable;</li> </ul>
Evidence Reviewed	<ul style="list-style-type: none"> <li>• Law No. 26/2013 of 11 /04: <a href="https://dre.pt/application/file/260367">https://dre.pt/application/file/260367</a></li> <li>• Pine processionary official Plan: <a href="http://www.icnf.pt/portal/florestas/prag-doe/resource/doc/proc/proc-florest-2015.pdf">http://www.icnf.pt/portal/florestas/prag-doe/resource/doc/proc/proc-florest-2015.pdf</a></li> <li>• Eucalyptus snout beetle official plan: <a href="http://www.icnf.pt/portal/florestas/prag-doe/ag-bn/gorg-eucal">http://www.icnf.pt/portal/florestas/prag-doe/ag-bn/gorg-eucal</a></li> </ul>
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
2.2.9	The Biomass Producer has implemented appropriate control systems and procedures for verifying that methods of waste disposal minimise negative impacts on forest ecosystems (CPET S5d).

Finding	<p>The legal framework for waste disposal is based on a recent law which applies to the Portuguese legal framework of EU Directive No. 2008/98/CE.</p> <p>The Portuguese Environment Agency is the national authority but other police authorities like SEPNA (National Republican Guard) and Nature Guards and Rangers have surveillance competencies in this matter, as well as municipal authorities that can implement municipal regulations in conformity with the relevant legislation. Waste disposal on forest lands exist in Portugal and it affects both private and public lands.</p> <p>In addition, BSL Woodfiber has developed a Good environmental practices Manual to be aware when to verify that methods of waste disposal minimise negative impacts on forest ecosystems and fulfilment of applicable legislation.</p> <p>Therefore, the risk for this indicator is considered Low Risk.</p>
Means of Verification	<ul style="list-style-type: none"> <li>• Field inspections</li> <li>• Delivery records of hazardous waste to an authorised waste management company</li> <li>• Existing legal framework. Laws, regulations and control bodies</li> <li>• Manual of good practices</li> <li>• Contracts /agreements with suppliers</li> </ul>
Evidence Reviewed	<ul style="list-style-type: none"> <li>• Waste Management and Planning Official page: <a href="https://www.apambiente.pt/index.php?ref=16&amp;subref=84">https://www.apambiente.pt/index.php?ref=16&amp;subref=84</a></li> <li>• Decree-Law No. 73/2011 of 17/06: <a href="https://www.apambiente.pt/zdata/Políticas/Resíduos/DL_73_2011_DQR.pdf">https://www.apambiente.pt/zdata/Políticas/Resíduos/DL_73_2011_DQR.pdf</a></li> <li>• National Waste Management Plan: <a href="file:///C:/Users/imobi_000/Downloads/Projeto_PNGR_2011-2020.pdf">file:///C:/Users/imobi_000/Downloads/Projeto_PNGR_2011-2020.pdf</a></li> <li>• European Waste Statistics: <a href="http://ec.europa.eu/eurostat/statistics-explained/index.php/Waste_statistics/pt">http://ec.europa.eu/eurostat/statistics-explained/index.php/Waste_statistics/pt</a></li> </ul>
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
2.3.1	<p>Analysis shows that feedstock harvesting does not exceed the long-term production capacity of the forest, avoids significant negative impacts on forest productivity and ensures long-term economic viability. Harvest levels are justified by inventory and growth data.</p>
Finding	<p>Statistical information on the National Forest Inventory is fully available from IFN5 (2005) and results from IFN6 (2010).</p> <p>Preliminary results from IFN6 (2010) for main species in pellet production show that:</p> <ul style="list-style-type: none"> <li>• The total forest area in Mainland Portugal is 3,154,800 ha of which 2,972,356 ha correspond to forested area.</li> <li>• Eucalyptus is the species with the largest area of settlements. Forest cover with Eucalyptus has increased 13% from 1995 to 2010 (over 90,000 ha in the period to a total surface of 812,000 ha in 2010; 755,355 ha in forested areas) mostly in areas converted from Pinus Pinaster (70,000 ha in the period). Pinus Wilt Disease/Nemátodo-do-pinheiro pest, fires and economic motivations can be behind it.</li> <li>• Pinus Pinaster forests have decreased significantly from 1995 to 2010: 27% in total surface (263,000 ha in the period to a total surface of 713,000 ha in 2010; 624,248 ha in forested areas). 163,000 ha were converted to open land, mostly related to Pinus Wilt Disease/Nemátodo-do-pinheiro pest and fires and 70,000 ha to Eucalyptus plantations, which can also include economic motivations. Represents the majority of inputs in BP feedstock.</li> </ul>

	<ul style="list-style-type: none"> <li>Pinus Pinea forests have increased significantly from 1995 to 2010: 54% (over 55,000 ha in the period to a total surface of 175,000 ha in 2010; 173,716 ha in forested areas). This species is planted primarily for the harvest of pine nuts and protective land use. It is not subject to harvest for round wood production so feedstock comes as a result of silvicultural works. This species has good biomass percentage in relation to its volume as a result of branches.</li> </ul> <p>Analysing statistical information available for average annual growth (AMA) from IFN5 (2005) shows for Mainland Portugal:</p> <ul style="list-style-type: none"> <li>On Eucalyptus an average annual growth of 4,375,000 m<sup>3</sup>/year based on 2005 inventory data. Currently the value will be significantly higher. Eucalyptus wood from Portugal consumption in 2014 was 5,400,000 m<sup>3</sup> (CELPA data). Eucalyptus is a fast-growing species, over 12 years, with one single cut in the period: final clear cut. So, harvesting does not compromise long-term production of the forest.</li> <li>On Pinus Pinaster an average annual growth of 3,650,000 m<sup>3</sup>/year based on 2005 inventory data. Currently the value will be lower. Pinus Pinaster wood from Portugal harvested in 2014 was 2,247,000 m<sup>3</sup> (Centro Pinus data). So, Pinus Pinaster wood available from Portugal is under AMA.</li> </ul> <p>On the analysis it is relevant also to take into account that:</p> <ul style="list-style-type: none"> <li>Pinus Wilt Disease (Nemátodo-da-madeira-do-pinheiro) pest has significantly affected Pinus Pinaster.</li> <li>Fires continue to be a relevant problem in Portugal.</li> <li>Data from Centro Pinus states that pine wood consumption of timber industry in 2014 was 4,360,000 m<sup>3</sup>, with relevant data of 1,400,000 m<sup>3</sup> for pellets, 32% of the total. Also 32% of pine wood used by Centro Pinus 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.</li> <li>Data from CELPA states that Eucalyptus consumption of pulp and paper industry in 2014 was 7,800,000 m<sup>3</sup> (4,980,000 m<sup>3</sup> in 2005), of which 2,415,000 m<sup>3</sup> were imported, mainly from Spain.</li> <li>The PROF for each region defines a silvicultural model for pine species, which is designed to improve long-term production capacity for the forest.</li> </ul> <p>Hence, all the above information shows that actual harvesting volume does not exceed sustainable values and compromises long-term economic viability of stands. Thus, the risk for this indicator has been assessed as Low.</p>
Means of Verification	<ul style="list-style-type: none"> <li>Management Plan, stocks and growth data</li> <li>National or regional inventories, stocks and growth data.</li> <li>Harvested volume data</li> <li>Type of forestry operations.</li> </ul>
Evidence Reviewed	<ul style="list-style-type: none"> <li>Estratégia Nacional das Florestas (RCM n.º 6-B/2015 - Diário da República n.º 24/2015, 1º Suplemento, Série I de 2015-02-04); ICNF portal (<a href="http://www.icnf.pt/portal/icnf/docref/enf">http://www.icnf.pt/portal/icnf/docref/enf</a>)</li> <li>Estatísticas Agrícolas 2015.xls, Instituto Nacional de Estatística (<a href="https://www.ine.pt/xportal/xmain?xpid=INE&amp;xpgid=ine_publicacoes&amp;PUBLICACOE_Spub_boui=271434407&amp;PUBLICACOESmodo=2">https://www.ine.pt/xportal/xmain?xpid=INE&amp;xpgid=ine_publicacoes&amp;PUBLICACOE_Spub_boui=271434407&amp;PUBLICACOESmodo=2</a>)</li> <li>Inventário Florestal Nacional IFN5 (FloreStat_IFN5); ICNF portal (<a href="http://www.icnf.pt/portal/florestas/ifn/ifn5/rel-fin">http://www.icnf.pt/portal/florestas/ifn/ifn5/rel-fin</a>)</li> <li>Inventário Florestal Nacional IFN6, preliminary results (IFN6 - Resultados preliminares.pdf); ICNF portal (<a href="http://www.icnf.pt/portal/florestas/ifn/ifn6">http://www.icnf.pt/portal/florestas/ifn/ifn6</a>) Boletim-Estatístico-da-Celpe-de-2014 (<a href="http://www.celpe.pt/wpcontent/uploads/2016/09/Boletim_WEB_2015.pdf">http://www.celpe.pt/wpcontent/uploads/2016/09/Boletim_WEB_2015.pdf</a>)</li> <li>Relatório-de-Characterização-da-Fileira-Florestal-2014 (<a href="http://www.aiff.org.pt/assets/Relatorio-de-Characterizacao-da-Fileira-Florestal-2014-160p-CAPA-3-spread....pdf">http://www.aiff.org.pt/assets/Relatorio-de-Characterizacao-da-Fileira-Florestal-2014-160p-CAPA-3-spread....pdf</a>)</li> <li>Fileira do Pinho: desafios e oportunidades (centroPINUS_JoaoGoncalves dados fileira pinho 2014.pdf); Centro Pinus (<a href="http://www.centropinus.org/index.php?lingua=1">http://www.centropinus.org/index.php?lingua=1</a>) Decreto-Lei 16-2009 planos gestão florestal (<a href="https://dre.pt/application/dir/pdf1sdip/2009/01/00900/0026800273.pdf">https://dre.pt/application/dir/pdf1sdip/2009/01/00900/0026800273.pdf</a>); ICNF portal</li> </ul>

	( <a href="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">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</a> ) Normas Técnicas Planos Gestão Florestal, ICNF portal ( <a href="http://www.icnf.pt/portal/florestas/gf/pgf/resource/doc/manual/normas-tecnPGF-AFN.pdf">http://www.icnf.pt/portal/florestas/gf/pgf/resource/doc/manual/normas-tecnPGF-AFN.pdf</a> )
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
<b>2.3.2</b>	Adequate training is provided for all personnel, including employees and contractors (CPET S6d).
Finding	<p>In Portugal, safety and health at work are heavily regulated, in accordance with Law No. 3/2014, 28 January, which proceeds to the second amendment to Law No. 102/2009, of 10 September, which approves the legal regime for the promotion of safety and health at work. Rectification Statement no. 20/2014, of 27 March, which amends Law no. 3/2014, of 28 January.</p> <p>Authorities with specific jurisdiction for licensing and inspecting the provisions of health and safety at work legislation in Portugal are: ACT (Working Conditions Authority); DGS (General Directorate of Health); and ANPC (National Civil Protection Authority).</p> <p>All companies must provide an annual report to the (Ministry for Solidarity and Social Security), which is registered in Annex D, with:</p> <ul style="list-style-type: none"> <li>• Quantity and severity of accidents at work and occupational diseases;</li> <li>• Training hours related to OSH (occupational safety and health);</li> <li>• Organization of OSH services;</li> <li>• Risk identification, assessment, and control;</li> <li>• Periodic and occasional aptitude tests.</li> </ul> <p>ACT has 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. FSC Portugal and forestry stakeholders were involved in some of these initiative. Information is not listed separately for the primary sector, so there are no statistics available on the trend of accidents at work in forestry. The publication on the results of accidents does not show a clear trend of improvement yet.</p> <p>Despite legal requirements, Portugal still performs poorly on work efficiency (and safety). The National Strategy for Forests states that the focus on the professionalization and training of the different actors in the forestry sector is of key importance for increasing the competitiveness and, thereby, the development of the sector.</p> <p>All our suppliers provide training and qualifications for the management of forestry machines. Portugal is a country with an old tradition on forests activities. University education is provided on the technical side with several colleges in the country. There are specific courses for field machinery operators but it is planned to be updated on the National Catalogue of Formations a new training on Forestry Machinery Technician not yet available.</p> <p>A legal obligation is that every employee should obtain 35 hours of training per year. Based on available information the requirements included in this indicator are considered Specified risk.</p>
Means of Verification	<ul style="list-style-type: none"> <li>• Contract with the prevention service enterprise</li> <li>• Training records by the prevention service</li> <li>• Training Certificates</li> <li>• Manual of Good Forestry Practices</li> </ul>

	<ul style="list-style-type: none"> <li>Contracts with providers</li> </ul>
Evidence Reviewed	<ul style="list-style-type: none"> <li>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 (<a href="http://www.icnf.pt/portal/icnf/docref/enf">http://www.icnf.pt/portal/icnf/docref/enf</a>); (<a href="http://www.icnf.pt/portal/florestas/gf/cotf">http://www.icnf.pt/portal/florestas/gf/cotf</a>); (<a href="http://www.icnf.pt/portal/florestas/gf/cotf/o-q-e">http://www.icnf.pt/portal/florestas/gf/cotf/o-q-e</a>); (<a href="http://www.icnf.pt/portal/florestas/gf/cotf/formacao">http://www.icnf.pt/portal/florestas/gf/cotf/formacao</a>);</li> <li>Actividades ACT (ACT Activities Report) - <a href="http://www.act.gov.pt/(pt-PT)/CentroInformacao/Estatistica/Paginas/AcidentesdeTrabalhoMortais.aspx">http://www.act.gov.pt/(pt-PT)/CentroInformacao/Estatistica/Paginas/AcidentesdeTrabalhoMortais.aspx</a></li> <li>Catalogo Nacional de Formações: (<a href="http://www.catalogo.anqep.gov.pt/PDF/QualificacaoReferencialPDF/1065/CA/dupl/acertificacao/623314_RefCA">http://www.catalogo.anqep.gov.pt/PDF/QualificacaoReferencialPDF/1065/CA/dupl/acertificacao/623314_RefCA</a>) (<a href="http://www.catalogo.anqep.gov.pt/boDocumentos/getDocumentos/522">http://www.catalogo.anqep.gov.pt/boDocumentos/getDocumentos/522</a>)</li> <li>Lei n.º 3/2014, de 28 de janeiro</li> <li>Declaração de Retificação n.º 20/2014, de 27 de março</li> </ul>
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	<p>BSL trains and/or informs its personnel and its suppliers on all relevant aspects:</p> <ul style="list-style-type: none"> <li>Training/information records obligatory according to legislation and necessary records of qualification are collected during supplier following process and checked during supplier visits;</li> <li>Training/information conducted by BSL in several fields, including identification of key ecosystems, habitats and species biodiversity (annually and additionally based on the results of the plot assessments);</li> <li>Training/information on best forest management practices.</li> <li>Training, assessing and/or information to suppliers.</li> </ul> <p>The level of knowledge of personnel is inspected during site visits.</p>

	Indicator
2.3.3	Analysis shows that feedstock harvesting and biomass production positively contribute to the local economy, including employment.
Finding	<p>The biomass sector in Portugal is complementary with other wood industries, as it uses and processes low-quality wood and forest residues and secondary feedstock. The biomass producers create a market for these kinds of remaining forest and wood industry residues. This market makes forest thinning feasible. Ever more people have a job at a biomass producer in Portugal, and the sector is pushing sustainability of the whole sector forward through strict and critical certification programs such as SBP. All these activities decrease the chance of forest fires, which are perceived as the greatest threat to local communities. The forest sector impacts positively in rural areas, proving alternatives in the long term for local communities to keep its population.</p> <p>Data from INE 2012 states that 91% of Portuguese forest sector enterprises have from 1 to 10 workers. Forest industries employ 78,000 people (12% of all Portuguese processing industry, 1.7% of Portuguese employed population) of which 10,600 work on logging companies and 20,800 on wood industry. Also annual turnover of forest sector industries was in 2012 over 7,392 M€ (2,497.6 M€ wood and furniture industry, 1,320.4 M€ cork industry and 3,574.6 M€ pulp and paper industry), representing 10% of all Portuguese processing industry. Despite the recent crisis, the forest sector has maintained its contribution, in macroeconomic terms, in terms of added value.</p> <p>Biomass/Feedstock with origin in Portuguese forest is supplied through local supply chains to BSL so economic impact related to feedstock chain from the forest, transportation, processing and BSL is local. Also it is mainly complementary with other wood industries as use on their</p>

	processes low quality wood (which previously it was not exploited or it was burned) or wastes from industrial processes. Based on the foregoing, the risk related to this indicator is classed as low.
Means of Verification	<ul style="list-style-type: none"> <li>List of employees</li> </ul>
Evidence Reviewed	<ul style="list-style-type: none"> <li>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 (<a href="http://www.icnf.pt/portal/icnf/docref/enf">http://www.icnf.pt/portal/icnf/docref/enf</a>)</li> <li>Estatísticas Agrícolas 2015.xls, Instituto Nacional Estatística</li> <li>(<a href="https://www.ine.pt/xportal/xmain?xpid=INE&amp;xpgid=ine_publicacoes&amp;PUBLICACOESpub_boui=271434407&amp;PUBLICACOESmodo=2">https://www.ine.pt/xportal/xmain?xpid=INE&amp;xpgid=ine_publicacoes&amp;PUBLICACOESpub_boui=271434407&amp;PUBLICACOESmodo=2</a>)</li> <li>Relatório-de-Characterização-da-Fileira-Florestal-2014 (<a href="http://www.aiff.org.pt/assets/Relatorio-de-Characterizacao-da-Fileira-Florestal-2014-160p-CAPA-3-spread....pdf">http://www.aiff.org.pt/assets/Relatorio-de-Characterizacao-da-Fileira-Florestal-2014-160p-CAPA-3-spread....pdf</a>)</li> <li>Fileira do Pinho: desafios e oportunidades (centroPINUS_JoaoGonçalves dados fileira pinho 2014.pdf); Centro Pinus (<a href="http://www.centropinus.org/index.php?lingua=1">http://www.centropinus.org/index.php?lingua=1</a>)</li> </ul>
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
<b>2.4.1</b>	The Biomass Producer has implemented appropriate control systems and procedures for verifying that the health, vitality and other services provided by forest ecosystems are maintained or improved (CPET S7a).
Finding	<p>Forest as a multifunctional space is of high value, whether commercially or in terms of the environmental services it offers. In Portugal there are various important forest areas in terms of protecting services by forest ecosystems, such as river basins and soil conservation. These areas are included in REN (National Ecological Reserve) and PROFs (Regional Forest Management Plans), which are mapped and available at the municipal level. This are useful tools which identify these critical areas and contribute to the sustainability of services provided by forest ecosystems.</p> <p>In Portugal the 'health, vitality and other services provided by forest ecosystems' can be of importance to the local population. Forests can be of importance to the environment around the forests, they can reduce the impact of extreme weather, and reduce the impact of air-pollution, and noise. Poor forest management can create a conflict of interests. For example, it takes only one dense forest stand to improve the perception of an area, if a certain industrial object needs to be covered up (visual pollution).</p> <p>Forests can be essential for:</p> <ul style="list-style-type: none"> <li>Recreation in and around the forests;</li> <li>Breaking hard winds and rainfall (roads and houses);</li> <li>Hunting, fishing and gathering of berries and mushrooms;</li> <li>Agriculture near the forests (this is of importance in Portugal);</li> <li>A good impression of the surroundings;</li> <li>Air quality, a buffer between motorways and urban areas.</li> </ul> <p>To address this point, the opinion of local residents and organisations about the quality of the forest management of the land owner, and the present harvesting and regeneration plans need to be taken into account. Small adjustments to a forestry plan can make a large difference. For example, not cutting an old tree with exceptional esthetical / recreational value.</p>

	<p>Although there is a specified risk for insufficient assessment of the impact of harvesting operations that replace (destroy) the existing forest ecosystem, nearly all risks are addressed by other indicators (with specified risk), such as indicators 2.2.1, 2.2.2, 2.2.3, 2.2.4, 2.2.6, 2.4.2, and 2.6.1.</p> <p>This indicator, in this case, is classified as Low Risk.</p> <p>BSL assesses the possible impacts of the harvest operations on the forest (including plantations), its surroundings and the population, during the visit to the plots and suppliers. Considering the structure of forest ownership in northern part of Portugal, there are risks that certain services are harmed. In general, however, these risks are perceived as low, and indicator 2.6.1. ensures any complaints about planned forest operations are taken seriously.</p>
Means of Verification	<ul style="list-style-type: none"> <li>• Overall evaluation of potential impacts of operations on forest ecosystem health and vitality</li> <li>• Assessment of potential impacts at operational level and of measures to minimise impacts</li> <li>• Regional Best Management Practices</li> <li>• Monitoring results</li> <li>• Experts consultations</li> <li>• Interviews with local people</li> </ul>
Evidence Reviewed	<ul style="list-style-type: none"> <li>• 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);</li> <li>• ICNF portal (<a href="http://www.icnf.pt/portal/icnf/docref/enf">http://www.icnf.pt/portal/icnf/docref/enf</a>)</li> <li>• UNECE, Forest Europe report 2011 (<a href="https://www.unece.org/fileadmin/DAM/publications/timber/Forest_Europe_report_2011_web.pdf">https://www.unece.org/fileadmin/DAM/publications/timber/Forest_Europe_report_2011_web.pdf</a>)</li> <li>• Programa Operacional de Sanidade Florestal, ICNF portal (<a href="http://www.icnf.pt/portal/florestas/prag-doe/posf">http://www.icnf.pt/portal/florestas/prag-doe/posf</a>)</li> <li>• Fitossanidade florestal. Divulgação e informação, ICNF portal (<a href="http://www.icnf.pt/portal/florestas/prag-doe/divulg">http://www.icnf.pt/portal/florestas/prag-doe/divulg</a>)</li> <li>• Programas de Monitorização e Controlo de Pragas e Doenças, ICNF portal (<a href="http://www.icnf.pt/portal/florestas/prag-doe/resource/img/apr-progr-monit-c-pragas-e-d/view">http://www.icnf.pt/portal/florestas/prag-doe/resource/img/apr-progr-monit-c-pragas-e-d/view</a>)</li> <li>• Medias Controlo Nemátodo-da-Madeira-do-Pinho_03_2015, ICNF portal (<a href="http://www.icnf.pt/portal/florestas/prag-doe/resource/doc/divul/apresentacoes/2015-03-12/NMP_03_2015.pdf">http://www.icnf.pt/portal/florestas/prag-doe/resource/doc/divul/apresentacoes/2015-03-12/NMP_03_2015.pdf</a>)</li> <li>• Inventario Florestal Nacional IFN5 (FloreStat_IFN5); ICNF portal (<a href="http://www.icnf.pt/portal/florestas/ifn/ifn5/rel-fin">http://www.icnf.pt/portal/florestas/ifn/ifn5/rel-fin</a>)</li> <li>• Inventario Florestal Nacional IFN6, preliminary results (IFN6 - Resultados preliminares.pdf); ICNF portal (<a href="http://www.icnf.pt/portal/florestas/ifn/ifn6">http://www.icnf.pt/portal/florestas/ifn/ifn6</a>)</li> <li>• Relatório-de-Characterização-da-Fileira-Florestal-2014 (<a href="http://www.aiff.org.pt/assets/Relatorio-de-Characterizacao-da-Fileira-Florestal-2014-160p-CAPA-3-spread....pdf">http://www.aiff.org.pt/assets/Relatorio-de-Characterizacao-da-Fileira-Florestal-2014-160p-CAPA-3-spread....pdf</a>)</li> <li>• Quercus NGO Manifesto da Quercus pelas florestas (<a href="http://www.quercus.pt/documentos-floresta/2955-manifesto-da-quercus-pela-florestas">http://www.quercus.pt/documentos-floresta/2955-manifesto-da-quercus-pela-florestas</a>)</li> </ul>
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	



	Indicator
2.4.2	The Biomass Producer has implemented appropriate control systems and procedures for verifying that natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b).
Finding	<p><b>Forest Fires:</b>  Every year people face the devastating power of forest fires in Portugal. Poor forest management stands are one of the main reasons of the fires. The forests are insufficiently managed to prevent forest fires.  The implementation of forest management plans is not obligatory for most forest. There are regulations on cleaning forest debris, in particular regarding eucalyptus stands. However these are often not executed in full, nor well.  The biomass sector create a market for low grade organic residues from forests and plantations.  Recently the government has issued new laws on limiting the conversion of forests to eucalyptus plantations and preventing forest fires, but law-enforcement on implementing regulations on cleaning forest debris and maintaining eucalyptus plantations is insufficient.  Only in case sustainable forest management has been implemented and the forest, and in particular the eucalyptus plantations have been managed according to best practises and legal requirements (cleaning along roads) the feedstock should considered in compliance with this SBP requirement.  Considering the lack of an implementation of forest management plans and forest debris cleaning, the risk of forest fires is high.  Fires are today the greatest perceived risk in the Portuguese forest sector. It can initiate a regressive vicious cycle that combines fire, 'seca', pests, diseases and invasive species.  The national program for forest fire protection (PNDFCI) establishes various levels (national, regional, municipal and local) in order to create a network of forest fire prevention (primary and secondary on public level and tertiary on forest owner level).  This system aims to compartmentalize extensive woodlands and contribute to the containment and firefighting. The identification of these elements is defined in the various plans in force particularly in the Forestry Management Regional Plans (PROF) and Forest Defense Municipal Plans Against Fires (PMDFCI), which also define the responsibilities for its implementation on field. In terms of forest owners are defined in Forest Management Plans and related (PEIF, PUB).  Private forest lands can be grouped into Forest Intervention Areas (ZIFs), a forest management instrument to ensure sustainability at the landscape scale. July 2016 there were 179 ZIFs, covering 924 447 ha of territory. One of the objectives of ZIFs is to reduce the conditions of ignition and fire spread implementing on the field planned measures. Field implementation of planned measures is uneven in Portugal.</p> <p><b>Pest and diseases</b>  Besides the specific operations listed above, a National Action Plan for Control of Pine Wilt Disease (NMP in PT) <i>Bursaphelenchus xylophilus</i> and its vector insect <i>Monochamus galloprovincialis</i> is in place. This mostly focuses in our case is <i>Pinus pinaster</i> (23% of all forest areas) but applies to all other host conifers (<i>Abies spp.</i>, <i>Cedrus spp.</i>, <i>Larix spp.</i>, <i>Picea spp.</i>, <i>Pinus spp.</i>, <i>Pseudotsuga spp.</i>, <i>Tsuga spp.</i>) – with these species covering 8% of forests. For these species there is obligation of previous communication of any felling and/or transportation of wood affected by pest. This documentation (phytosanitary manifest) also must accompany material until the arrival to industrial processing facilities.  Regarding the statistical information available for average annual growth (AMA) from IFN5 (2005) Pinus Wilt Disease/Nemátodo-da-madeira-do-pinheiro pest have affected significantly <i>Pinus pinaster</i>.</p> <p>Actions taken to fight pests:</p> <ul style="list-style-type: none"> <li>• Traps for NMP (Pine Wood Nematode (<i>Bursaphelenchus xylophilus</i>, and its vector the insect <i>Monochamus galloprovincialis</i>)</li> <li>• Use of net (cover) during transport of wood in the period insect vector NMP</li> <li>• Phytopharmaceutical application on the ground</li> <li>• Crushing of the same wood with no lead time of 2, 3 days. wood with symptoms.</li> <li>• Cleaning of all utensils and machinery used in the handling of woody material.</li> <li>• Application of good forest practices to avoid a spread of this pest.</li> </ul>

	On the above information specified risk is assessed for forest fires and Pine Wood Nematode.
Means of Verification	<ul style="list-style-type: none"> <li>Existing legal framework. Laws, regulations and control bodies.</li> <li>Assessment of the potential impacts of forestry operations on the health and vitality of forests.</li> <li>Assessment of potential impacts at site level and of the measures taken to minimise them</li> <li>Good Environmental Practices in Sustainable Forest Management</li> <li>Contracts/agreements with suppliers</li> <li>Information received from suppliers</li> <li>Monitoring results</li> </ul>
Evidence Reviewed	<ul style="list-style-type: none"> <li>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 (<a href="http://www.icnf.pt/portal/icnf/docref/enf">http://www.icnf.pt/portal/icnf/docref/enf</a>)</li> <li>Programa Operacional de Sanidade Florestal, ICNF portal (<a href="http://www.icnf.pt/portal/florestas/prag-doe/posf">http://www.icnf.pt/portal/florestas/prag-doe/posf</a>)</li> <li>Fitossanidade florestal. Divulgação e informação, ICNF portal (<a href="http://www.icnf.pt/portal/florestas/prag-doe/divulg">http://www.icnf.pt/portal/florestas/prag-doe/divulg</a>)</li> <li>Programas de Monitorização e Controlo de Pragas e Doenças, ICNF portal (<a href="http://www.icnf.pt/portal/florestas/prag-doe/resource/img/apr-progr-monit-c-pragas-e-d/view">http://www.icnf.pt/portal/florestas/prag-doe/resource/img/apr-progr-monit-c-pragas-e-d/view</a>)</li> <li>Medias Controlo Nemátodo-da-Madeira-do-Pinheiro_03_2015, ICNF portal (<a href="http://www.icnf.pt/portal/florestas/prag-doe/resource/doc/divul/apresentacoes/2015-03-12/NMP_03_2015.pdf">http://www.icnf.pt/portal/florestas/prag-doe/resource/doc/divul/apresentacoes/2015-03-12/NMP_03_2015.pdf</a>)</li> <li>Decreto lei 123-2015 nematodo do Pinheiro (<a href="https://dre.pt/application/file/67649256">https://dre.pt/application/file/67649256</a>)</li> <li>ICNF portal (<a href="http://www.icnf.pt/portal/florestas/prag-doe/ag-bn/nmp">http://www.icnf.pt/portal/florestas/prag-doe/ag-bn/nmp</a>)</li> <li>Declaração Retificação n.º 38/2015 de 01/09 (<a href="https://dre.pt/application/file/70144398">https://dre.pt/application/file/70144398</a>)</li> <li>Inventario Florestal Nacional IFN5 (FloreStat_IFN5)</li> <li>ICNF portal (<a href="http://www.icnf.pt/portal/florestas/ifn/ifn5/rel-fin">http://www.icnf.pt/portal/florestas/ifn/ifn5/rel-fin</a>)</li> <li>Inventario Florestal Nacional IFN6, preliminary results (IFN6 - Resultados preliminares.pdf)</li> <li>ICNF portal (<a href="http://www.icnf.pt/portal/florestas/ifn/ifn6">http://www.icnf.pt/portal/florestas/ifn/ifn6</a>)</li> <li>Plano Nacional de Defesa da Floresta Contra Incêndios (<a href="https://dre.pt/application/dir/pdf1sdip/2006/05/102B00/35113559.pdf">https://dre.pt/application/dir/pdf1sdip/2006/05/102B00/35113559.pdf</a>);</li> <li>ICNF portal (<a href="http://www.icnf.pt/portal/florestas/dfci/planos/PNDFCI">http://www.icnf.pt/portal/florestas/dfci/planos/PNDFCI</a>)</li> <li><a href="http://www2.icnf.pt/portal/florestas/gf/zif/zif-constituídas">http://www2.icnf.pt/portal/florestas/gf/zif/zif-constituídas</a></li> <li>Zonas de Intervenção Florestal, ICNF portal (<a href="http://www.icnf.pt/portal/florestas/gf/zif/sit-ger-inf">http://www.icnf.pt/portal/florestas/gf/zif/sit-ger-inf</a>)</li> <li>Relatório-de-Characterização-da-Fileira-Florestal-2014 (<a href="http://www.aiff.pt/aiff/caracterizacao-da-fileira-florestal-portuguesa/">http://www.aiff.pt/aiff/caracterizacao-da-fileira-florestal-portuguesa/</a>)</li> </ul>
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	<p>Visual inspection of the plot before harvesting (checklist). Checked is if the plot was managed well on fire protection in the past.</p> <ul style="list-style-type: none"> <li>Investigation of PMDFCI (Municipal Forest Fire Protection, Municipal de Defesa da Floresta Contra Incêndios);</li> <li>Visual inspection of the plot before harvesting;</li> <li>Implementation of forest fire fighting measures according to law;</li> <li>Best forest practices;</li> <li>Monitoring performance.</li> </ul>

	Indicator
2.4.3	The Biomass Producer has implemented appropriate control systems and procedures for verifying that there is adequate protection of the forest from unauthorised activities, such as illegal logging, mining and encroachment (CPETS7c).
Finding	There are no significant problems in Portugal with unauthorized or illegal activities in forests such as logging, mining or illegal occupation. Small scale problems can be identified, such as unauthorized sports activities, theft of firewood, wood or fruit, poaching, fly tipping, etc. Illegal or unauthorized activities have a small impact on Portuguese forests and there are no reports of situations of substantial magnitude with regards this issue. Therefore, the risk related to this indicator is classed as low.
Means of Verification	<ul style="list-style-type: none"> <li>Records of field inspections and monitoring</li> <li>Interviews/contacts with workers</li> <li>Interviews/contacts with relevant parties</li> <li>Public information available (media)</li> </ul>
Evidence Reviewed	<ul style="list-style-type: none"> <li>Transparency International. CPI Portugal: <a href="https://www.transparency.org/en/countries/portugal">https://www.transparency.org/en/countries/portugal</a></li> <li>FSC CW NRA 2018: <a href="https://ic.fsc.org/en/document-center/id/239">https://ic.fsc.org/en/document-center/id/239</a></li> <li>ILLEGAL LOGGING PORTAL, Portugal (<a href="http://www.illegal-logging.info/regions/portugal">http://www.illegal-logging.info/regions/portugal</a>)</li> <li>Transparency international, corruption perception index Portugal (<a href="https://www.transparency.org/country/#PRT">https://www.transparency.org/country/#PRT</a>)</li> <li>CIFOR fact sheet on illegal logging: <a href="https://www.cifor.org">https://www.cifor.org</a></li> </ul>
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

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

	<p>Cases are, where the custom is considered within the law framework, designated by <i>secundum legem</i>. When the custom completes the law framework, filling in a law deficiency or interpreting it, it is designated as <i>praeter legem</i>.</p> <p>Customary law does not mean that the custom has the force of law, but only a source of law. That is, laws are also based on customs, the "normal use" of society for which the standard was made. Laws must meet what is customary as well as common practices of what is socially and morally right. Hence it is a source of interpretation of norms. It is in this sense that customary law must be understood.</p> <p>The customary right is described in article 348 of the Portuguese civil code. The interpretation of laws is described in article 9 of the Portuguese civil code.</p> <p>In the case of community areas, specific legislation regulates rights of use of common forest areas. (Lei dos Baldios)</p> <p>There are no indigenous people or minorities that need special protection in the country, nor local communities who depend on forest services for their subsistence and for this reason, low risk is found for this indicator.</p>
Means of Verification	<ul style="list-style-type: none"> <li>• Customary rights, when applicable, are identified and documented</li> <li>• Interviews with local communities or other relevant parties</li> <li>• Appropriate procedures in place to resolve any conflicts</li> </ul>
Evidence Reviewed	<ul style="list-style-type: none"> <li>• FSC CW NRA 2018: <a href="https://ic.fsc.org/en/document-center/id/239">https://ic.fsc.org/en/document-center/id/239</a></li> <li>• 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 (<a href="http://www.icnf.pt/portal/icnf/docref/enf">http://www.icnf.pt/portal/icnf/docref/enf</a>)</li> <li>• Lei n.º 68-93 Baldios (<a href="http://www.proder.pt/ResourcesUser/Legisla%C3%A7%C3%A3o/Nacional/Lein%C2%BA68-93.pdf">http://www.proder.pt/ResourcesUser/Legisla%C3%A7%C3%A3o/Nacional/Lein%C2%BA68-93.pdf</a>)</li> <li>• Coelho, I.S. (2003) Propriedade da Terra e Política Florestal em Portugal (<a href="http://www.scielo.mec.pt/pdf/slu/v11n2/v11n2a05.pdf">http://www.scielo.mec.pt/pdf/slu/v11n2/v11n2a05.pdf</a>)</li> <li>• Dec-Law n.º 254/2009 of 24/09 (<a href="http://www.proder.pt/ResourcesUser/Legisla%C3%A7%C3%A3o/Nacional/Decreto-Lein%C2%BA254-2009.pdf">http://www.proder.pt/ResourcesUser/Legisla%C3%A7%C3%A3o/Nacional/Decreto-Lein%C2%BA254-2009.pdf</a>)</li> <li>• Law n.º 12/2012 of 13/03 (<a href="https://dre.pt/application/dir/pdf1sdip/2012/03/05200/0110301103.pdf">https://dre.pt/application/dir/pdf1sdip/2012/03/05200/0110301103.pdf</a>)</li> <li>• Port. n.o 247/2001 of 22/03 (<a href="https://dre.pt/application/dir/pdf1sdip/2001/03/069B00/16111612.pdf">https://dre.pt/application/dir/pdf1sdip/2001/03/069B00/16111612.pdf</a>)</li> </ul>
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
<b>2.5.2</b>	The Biomass Producer has implemented appropriate control systems and procedures for verifying that production of feedstock does not endanger food, water supply or subsistence means of communities, where the use of this specific feedstock or water is essential for the fulfilment of basic needs.
Finding	Subsistence needs for local communities are assessed as being not applicable for Portugal. There are no indigenous people in Portugal nor minorities dependant on forests for their livelihood.
Means of Verification	<ul style="list-style-type: none"> <li>• Appropriate mechanisms exist to resolve disputes (see 2.6.1)</li> </ul>
Evidence Reviewed	<ul style="list-style-type: none"> <li>• FSC National Risk Assessment for Portugal (FSC-NRA-PT V1.0): <a href="https://fsc.org/en/document-centre/documents/resource/292">https://fsc.org/en/document-centre/documents/resource/292</a></li> </ul>

	<ul style="list-style-type: none"> <li>Coelho, I.S. (2003) Propriedade da Terra e Política Florestal em Portugal (<a href="http://www.scielo.mec.pt/pdf/slu/v11n2/v11n2a05.pdf">http://www.scielo.mec.pt/pdf/slu/v11n2/v11n2a05.pdf</a>)</li> </ul>
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
<b>2.6.1</b>	The Biomass Producer has implemented appropriate control systems and procedures for verifying that appropriate mechanisms are in place for resolving grievances and disputes, including those relating to tenure and use rights, to forest management practices and to work conditions.
Finding	<p>Grievances and disputes, including those relating to tenure and use rights, forest management practices and work conditions in Portugal are regulated by laws. Legal framework includes the Portuguese Constitution, the Labour Code and other specific regulations. The detailed procedures, duties and responsibilities of involved persons are defined in both legislation and other legal regulations. Legislation and justice system provides a route for appeal should people or companies be dissatisfied with the outcome of the dispute resolution process.</p> <p>Land tenure and use rights are object of Civil Code, being land tenure included on private property rights on Constitution article 62th. These rights include communitarian forests and also Forest Renting/leasing contracts.</p> <p>Disputes about forest management practices would involve forest authorities ICNF on both public and private forests. Specific forest management practices should be included on renting and forest services contracts as harvesting/management 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.</p> <p>Although this risk is addressed in the general legal framework of Portugal, BSL is of the opinion that this indicator needs additional attention as a 'safety net', in order to perform well on other indicators, which are categorised 'specified risk'.</p>
Means of Verification	<ul style="list-style-type: none"> <li>Complaint procedure and log book</li> <li>Field and office inspections (checklists)</li> <li>Interviews with land owners, local residents</li> <li>Forest Best Management Practices</li> </ul>
Evidence Reviewed	<ul style="list-style-type: none"> <li>Labour Code: Law n.º 7/09 12/02 (<a href="http://www.act.gov.pt/(pt-PT)/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx">http://www.act.gov.pt/(pt-PT)/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx</a>)</li> <li>Portuguese Constitution</li> <li>Civil Code: <a href="http://www.pgdlisboa.pt/leis/lei_mostra_articulado.php?nid=775&amp;tabela=leis">http://www.pgdlisboa.pt/leis/lei_mostra_articulado.php?nid=775&amp;tabela=leis</a></li> <li>FSC CW NRA 2018: <a href="https://ic.fsc.org/en/document-center/id/239">https://ic.fsc.org/en/document-center/id/239</a></li> </ul>
Risk Rating	<input type="checkbox"/> <b>Low Risk</b> <input checked="" type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	BSL takes seriously any complaint of any person or organisation considering harvesting operations. This also improves performance on respecting local interests. The aim is to track down and solve grievances and disputes before the harvesting operations commence. The feedstock suppliers are required to pro-actively implement a complaint procedure and keep records (which are checked).

	<p>Such mechanisms play an important function as a safety net for sufficient performance on social and cultural aspects of Sustainable Forest Management and in complying with other indicators of SBP standard 1.</p> <ul style="list-style-type: none"> <li>• The aim is to solve grievances and disputes before the harvesting operations commence (or not to buy from the disputed plots).</li> <li>• BSL makes clear to employees and stakeholders that any complaint or comment related to feedstock supply is taken very seriously, to ensure sufficient performance on legality and social aspects of Sustainable Forest Management.</li> <li>• BSL has a complaint procedure and keeps complaint records of any stakeholder. The feedstock suppliers are also required (signed supplier declaration) to actively implement a complaint procedure and keep records.</li> <li>• BSL monitors the harvesting operations of its feedstock suppliers and checks their records on Complaints and Comments. Pro-active interviews/contacts with relevant stakeholders, such as land owners on submitted comments (orally and in writing), and assesses if complaints were dealt with properly.</li> <li>• The results of the inspections/contacts are of direct importance to the 'SBE program approved' status of feedstock suppliers.</li> </ul>
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	Indicator
<b>2.7.1</b>	<p>The Biomass Producer has implemented appropriate control systems and procedures for verifying that Freedom of Association and the effective recognition of the right to collective bargaining are respected.</p>
Finding	<p>Portugal signed the ILO fundamental conventions, which includes the C87 Freedom of Association and Protection of the Right to Organize Convention (1948) in 1977 and C98 Right to Organize and Collective Bargaining Convention (1949) in 1964. This right is included in the Portuguese constitution in article 56. The majority of working activities are covered by an annual working collective convention, which includes the forest sector.</p> <p>International Trade Union Confederation (IUTC) ranks 139 countries against 97 internationally recognised indicators to assess where workers' rights are best protected, in law and in practice.</p> <p>Portugal has a rating of 3, from 1 to 5+, in the ITUC Global Rights Index 2014. This score is given for countries where: (There are) "Regular violation of rights. The government and/or companies are regularly interfering in collective labour rights. Yet, there are deficiencies in laws and/or certain practices which make frequent violations possible."</p> <p>The Authority directly involved in supervision of employment rights and conditions is Work Conditions Authority (ACT) but for many reasons other authorities are related to the issue, like Immigration and Borders Services (SEF) social security services or even tax services. All of them can make inspections on different issues related to work, joined by police authorities like GNR – National Republican Guard and PSP-Public Security Police.</p> <p>ACT has strategic Plans for Agriculture and Forest activities and also does integrated inspections with Portuguese authorities for agriculture and forestry activities. A recent notice states that ACT acquired a drone to help agriculture and forestry inspections.</p> <p>Inspective activities of ACT and SEF result in penalties or suspensions when illegal situations are found.</p> <p>There were no law violations identified on the right of freedom of association and collective bargaining in the Portuguese forest sector.</p> <p>According to the available information this indicator is classified as low risk.</p>
Means of Verification	<ul style="list-style-type: none"> <li>• Legislation</li> <li>• Level of enforcement</li> <li>• Portuguese constitution</li> <li>• Regional, publicly available data from a credible third party</li> <li>• Publicly available information (News and media)</li> </ul>
Evidence Reviewed	<ul style="list-style-type: none"> <li>• Agriculture, Food and Forest Union: <a href="http://www.setaa.pt/index.php/Geral/">http://www.setaa.pt/index.php/Geral/</a></li> </ul>

	<ul style="list-style-type: none"> <li>• Boletim do Trabalho e Emprego [Work and Employment Bulletin]: <a href="http://bte.gep.msess.gov.pt/">http://bte.gep.msess.gov.pt/</a> <a href="http://bte.gep.msess.gov.pt/completos/2016/bte4_2016.pdf">http://bte.gep.msess.gov.pt/completos/2016/bte4_2016.pdf</a></li> <li>• WWW.ILO: <a href="http://www.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO::P13100_COMMENT_ID,P13100_LANG_CODE:3253858,en:NO">http://www.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO::P13100_COMMENT_ID,P13100_LANG_CODE:3253858,en:NO</a></li> <li>• Overview of ILO convention ratifications by Portugal: <a href="http://www.ilo.org/public/portugue/region/eurpro/lisbon/html/portugal_convencoes_numero_pt.htm">http://www.ilo.org/public/portugue/region/eurpro/lisbon/html/portugal_convencoes_numero_pt.htm</a></li> <li>• ITUC Global RIGhTs Index The woRld's woRsT CoUnTRles foR workers: <a href="http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf">http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf</a></li> <li>• Labour Code• Law n. ° 7/09 12/02 and updates like L69/13, of 30/08 includes collective convention <a href="http://www.act.gov.pt/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx">http://www.act.gov.pt/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx</a></li> <li>• Portuguese Constitution</li> <li>• Government sources: SEF Statistical Annual reports: <a href="http://sefstat.sef.pt/relatorios.aspx">http://sefstat.sef.pt/relatorios.aspx</a> SEF Inspective news about forest sector: <a href="http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=7018">http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=7018</a> <a href="http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=6802">http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=6802</a></li> <li>• ACT Annual Reports: <a href="http://www.act.gov.pt/(ptPT)/SobreACT/DocumentosOrientadores/RelatorioActividades/Paginas/default.aspx">http://www.act.gov.pt/(ptPT)/SobreACT/DocumentosOrientadores/RelatorioActividades/Paginas/default.aspx</a></li> </ul>
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
2.7.2	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not supplied using any form of compulsory labour.
Finding	<p>Portugal ratified the convention against forced labour (No.29) 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, accepts calls, transports, harbours or receives a person for the purpose of exploitation, including sexual exploitation, labour exploitation, begging, slavery, harvest of organs or other exploitation by criminal activities and he / she has abused the authority resulting from a hierarchical relationship of dependency (whether financial, family or work related) is punished with imprisonment of three to ten years. Source: § (Article 160 of Decree-Law No. 400/82 Penal Code amended by Law No. 59/2007 and Law No. 60/2013).</p> <p>International Trade Union Confederation (IUTC) ranks 139 countries against 97 internationally recognised indicators to assess where workers' rights are best protected, in law and in practice. Portugal has a rating of 3, from 1 to 5+, in the ITUC Global Rights Index 2014. This score is given for countries where: (There are) "Regular violation of rights. The government and/or companies are regularly interfering in collective labour rights. There are deficiencies in laws and/or certain practices which make frequent violations possible."</p> <p>ACT has strategic Plans for Agriculture and Forest activities and also does integrated inspections with Portuguese authorities for agriculture and forestry activities. A recent notice states that ACT acquired a drone to help agriculture and forestry inspections. Inspective activities of ACT and SEF result in penalties or suspensions when illegal situations are found.</p>

	Nevertheless, in forestry no evidence was found 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	<ul style="list-style-type: none"> <li>• Legislation</li> <li>• Level of enforcement</li> <li>• Regional, publicly available data from a credible third party</li> <li>• Publicly available information (News and media)</li> </ul>
Evidence Reviewed	<ul style="list-style-type: none"> <li>• III National Plan to Prevent and Combat Trafficking of Human Beings 2014-2017 at <a href="http://www.igualdade.gov.pt/images/stories/documentos/legislacao/legislacao/Plano_s_Nacionais/2014-2017-iii-pnpc-tsh-en.pdf">http://www.igualdade.gov.pt/images/stories/documentos/legislacao/legislacao/Plano_s_Nacionais/2014-2017-iii-pnpc-tsh-en.pdf</a></li> <li>• Observatory on Trafficking of Human Beings: <a href="http://www.otsh.mai.gov.pt/Recursos/Pages/default.aspx">http://www.otsh.mai.gov.pt/Recursos/Pages/default.aspx</a></li> <li>• Reports of Observatory on Trafficking of Human Beings: 2015; 2014; 2013; 2012; 2011</li> <li>• Overview of ILO convention ratifications by Portugal: <a href="http://www.ilo.org/public/portugue/region/eurpro/lisbon/html/portugal_convencoes_numero_pt.htm">http://www.ilo.org/public/portugue/region/eurpro/lisbon/html/portugal_convencoes_numero_pt.htm</a></li> <li>• ITUC Global RIGhTs Index The woRld's woRsT CoUnTRles foR workers: <a href="http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf">http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf</a></li> </ul> <p><b>Government sources:</b></p> <ul style="list-style-type: none"> <li>• SEF Statistical Annual reports: <a href="http://sefstat.sef.pt/relatorios.aspx">http://sefstat.sef.pt/relatorios.aspx</a></li> <li>• SEF Inspective news about forest sector: <a href="http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=7018">http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=7018</a> <a href="http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=6802">http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=6802</a></li> <li>• ACT Annual Reports: <a href="http://www.act.gov.pt/(ptPT)/SobreACT/DocumentosOrientadores/RelatorioActividades/Paginas/default.aspx">http://www.act.gov.pt/(ptPT)/SobreACT/DocumentosOrientadores/RelatorioActividades/Paginas/default.aspx</a></li> </ul>
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
<b>2.7.3</b>	The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is not supplied using child labour.
Finding	<p>In Portugal the minimum age for employment is 16 years. An under-16 minor cannot be used to carry out a paid activity delivered with autonomy unless he / she has completed compulsory education or is enrolled and attending secondary education, and it is light work. This light work should consist of simple tasks and is not likely to adversely affect the physical integrity, safety and health, school attendance, or their moral, psychological, intellectual, cultural and physical well-being. (Art. 66-83 of the Labour Code) 2009.</p> <p>Portugal ratified Minimum Age Convention (1973) C138 in 1989 and the convention C182 Worst Forms of Child Labour Convention (1999) in 2000.</p> <p>International Trade Union Confederation (IUTC) ranks 139 countries against 97 internationally recognised indicators to assess where workers' rights are best protected, in law and in practice. Portugal has a rating of 3, from 1 to 5+, in the ITUC Global Rights Index 2014. This score is given for countries where:</p> <p>(There are) "Regular violation of rights. The government and/or companies are regularly interfering in collective labour rights. There are deficiencies in laws and/or certain practices which make frequent violations possible."</p>



	<p>UNICEF report 2012 “Measuring Child Poverty was rating 14.7% of Portuguese children below 16 years of age as below the “poverty line”.</p> <p>Robust data about child labour are not recent, as the last official inquiry report is from 2001, and the results were not positive as 4.1% of children in the study were affected by child labour (CNAsti), with half of this proportion related to agriculture.</p> <p>2015: FSC Portugal CNRA report states “Despite evidence of some (remaining) cases of child labour, there is evidence that this problem is neither structural nor of large size. No evidence found of cases of child labour in the forest sector. The national CWRA explicitly mentions “child labour in the forest sector in Portugal is very low”. There is evidence that the number of minors working illegally is rather insignificant.</p> <p>Authority directly involved in employment rights and conditions is Work Conditions Authority (ACT) but for many reasons other authorities are related to the issue, like Immigration and Borders Services (SEF) social security services or even tax services. All of them can make inspections on different issues related to work, joined by police authorities like GNR – National Republican Guard and PSP-Public Security Police.</p> <p>ACT has strategic Plans for Agriculture and Forest activities and also does integrated inspections with Portuguese authorities for agriculture and forestry activities. A recent notice states that ACT acquired a drone to help agriculture and forestry inspections.</p> <p>Inspective activities of ACT and SEF result in penalties or suspensions when illegal situations are found.</p> <p>Nevertheless, based on the available information no evidence was found confirming the existence of risks of child labour in forestry in Portugal.</p> <p>According to the available information this indicator is classified as low risk.</p>
Means of Verification	<ul style="list-style-type: none"> <li>• Legislation</li> <li>• Level of enforcement</li> <li>• Regional, publicly available data from a credible third party</li> <li>• Publicly available information (News and media)</li> </ul>
Evidence Reviewed	<p><b>Legislation:</b></p> <ul style="list-style-type: none"> <li>• Labour Code: Law No. 7/09 of 12/02 <a href="http://www.act.gov.pt/(pt-PT)/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx">http://www.act.gov.pt/(pt-PT)/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx</a></li> <li>• Law No. 47/2012, of 29/08 at <a href="http://www.cnasti.pt/cnasti/documentos/1403451265.pdf">http://www.cnasti.pt/cnasti/documentos/1403451265.pdf</a></li> <li>• Decree Republic President 28/2000 1/06 at <a href="http://www.ilo.org/public/portugue/region/eurpro/lisbon/pdf/conv_182.pdf">http://www.ilo.org/public/portugue/region/eurpro/lisbon/pdf/conv_182.pdf</a></li> <li>• Republic Assembly Resolution 11/98 at <a href="http://www.ilo.org/public/portugue/region/eurpro/lisbon/pdf/conv_138.pdf">http://www.ilo.org/public/portugue/region/eurpro/lisbon/pdf/conv_138.pdf</a></li> </ul> <p><b>Government sources:</b></p> <ul style="list-style-type: none"> <li>• SEF Statistical Annual reports: <a href="http://sefstat.sef.pt/relatorios.aspx">http://sefstat.sef.pt/relatorios.aspx</a></li> <li>• SEF Inspective news about forest sector: <a href="http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=7018">http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=7018</a> <a href="http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=6802">http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=6802</a></li> <li>• ACT Annual Reports: <a href="http://www.act.gov.pt/(ptPT)/SobreACT/DocumentosOrientadores/RelatorioActividades/Paginas/default.aspx">http://www.act.gov.pt/(ptPT)/SobreACT/DocumentosOrientadores/RelatorioActividades/Paginas/default.aspx</a></li> <li>• News about ACT inspective work including forest: <a href="http://www.act.gov.pt/(ptPT)/Itens/Noticias/Paginas/ACTeInspe%C3%A7%C3%A3o doTrabalhodeEspanhaema%C3%A7%C3%B5esconjuntas.aspx">http://www.act.gov.pt/(ptPT)/Itens/Noticias/Paginas/ACTeInspe%C3%A7%C3%A3o doTrabalhodeEspanhaema%C3%A7%C3%B5esconjuntas.aspx</a></li> <li>• ACT Strategic Plan for Agriculture and Forestry Activities: <a href="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">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</a></li> </ul> <p><b>Other Sources:</b></p> <ul style="list-style-type: none"> <li>• Overview of ILO convention ratifications by Portugal: <a href="http://www.ilo.org/public/portugue/region/eurpro/lisbon/html/portugal_convencoes_numero_pt.htm">http://www.ilo.org/public/portugue/region/eurpro/lisbon/html/portugal_convencoes_numero_pt.htm</a></li> <li>• Social characterization of aggregates Portuguese Family with Children of School Age <a href="http://www.cnasti.pt/cnasti/documentos/1403450788.pdf">http://www.cnasti.pt/cnasti/documentos/1403450788.pdf</a></li> </ul>

	<ul style="list-style-type: none"> <li>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: <a href="http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf">http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf</a></li> </ul>
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
<b>2.7.4</b>	<p>The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not supplied using labour which is discriminated against in respect of employment and occupation.</p>
Finding	<p>Protection against discrimination in labour is included in the Portuguese constitution (Article 55), and labour code.</p> <p>Portugal ratified the ILO convention about discrimination on work and career C111 (1958) in the year 1959. Also, the convention on equal remuneration C100 was ratified in the year 1966.</p> <p>Portugal is well positioned in the majority of international reports:</p> <ul style="list-style-type: none"> <li>Corruption Perception Index scores 63 meaning low perceived level of corruption;</li> <li>Worldwide Governance Indicators (WGI) from 73.3 to 84.13 (1-100points)</li> <li>The WGI reports six aggregate governance indicators for over 200 countries and territories over the period 1996-2014, covering i) Voice and Accountability, ii) Political Stability and Absence of Violence/Terrorism, iii) Government Effectiveness, iv) Regulatory Quality, v) Rule of Law, and vi) Control of Corruption.</li> <li>Free country on press, net, political rights and civil liberties.</li> </ul> <p>On the other hand Portugal (including human rights, illegal logging, forest and timber) is not listed in alarming reports or indexes such as:</p> <ul style="list-style-type: none"> <li>Committee to Protect Journalists Impunity Index;</li> <li>Human Rights Watch;</li> <li>Global Witness</li> <li>Chatham House</li> <li>Amnesty International</li> </ul> <p>Some observations were found about discrimination against women in jobs and remuneration and gender pay gap (see below Direct Request (CEACR) - adopted 2014, published 104th ILC session (2015) Equal Remuneration Convention, 1951 (No. 100) – Portugal).</p> <p>Also, discrimination episodes were found against Roma and LGB (see below Amnesty International 2014/2015 report The State of the World's Human Rights) but not related to work activities.</p> <p>Authority directly involved in employment rights and conditions is Work Conditions Authority (ACT) but for many reasons other authorities are related to the issue, like Immigration and Borders Services (SEF) social security services or even tax services. All of them can make inspections on different issues related to work, joined by police authorities like GNR – National Republican Guard and PSP – Public Security Police.</p> <p>ACT has strategic Plans for Agriculture and Forest activities and also does integrated inspections with Portuguese authorities for agriculture and forestry activities. A recent notice states that ACT acquired a drone to help agriculture and forestry inspections.</p> <p>Inspective activities of ACT and SEF result in penalties or suspensions when illegal situations are found.</p>

	Based on the available information, no evidence was found that confirms the existence of risks of discrimination in respect to employment and occupation in forestry in Portugal. According to the available information this indicator is classified as low risk.
Means of Verification	<ul style="list-style-type: none"> <li>• Legislation</li> <li>• Level of enforcement</li> <li>• Regional, publicly available data from a credible third party</li> <li>• Publicly available information (News and media)</li> </ul>
Evidence Reviewed	<p><b>Legislation:</b></p> <ul style="list-style-type: none"> <li>• Portuguese Constitution</li> <li>• Labour Code</li> <li>• Law n. ° 7/09 of 12/02 <a href="http://www.act.gov.pt/(pt-PT)/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx">http://www.act.gov.pt/(pt-PT)/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx</a></li> <li>• Dec-Law 42520/1959 23/09 at <a href="http://www.ilo.org/public/portugue/region/eurpro/lisbon/pdf/conv_111.pdf">http://www.ilo.org/public/portugue/region/eurpro/lisbon/pdf/conv_111.pdf</a></li> <li>• Dec-Law 47 302/1966 of 04/11 at <a href="http://www.ilo.org/public/portugue/region/eurpro/lisbon/pdf/conv_100.pdf">http://www.ilo.org/public/portugue/region/eurpro/lisbon/pdf/conv_100.pdf</a></li> </ul> <p><b>Other sources:</b></p> <ul style="list-style-type: none"> <li>• Transparency International <a href="http://www.transparency.org/cpi2015#map-container">http://www.transparency.org/cpi2015#map-container</a></li> <li>• UN Sanctions List at: <a href="https://www.un.org/sc/suborg/en/sanctions/un-sc-consolidated-list">https://www.un.org/sc/suborg/en/sanctions/un-sc-consolidated-list</a></li> <li>• World Bank: Worldwide Governance Indicators <a href="http://info.worldbank.org/governance/wgi/index.aspx#countryReports">http://info.worldbank.org/governance/wgi/index.aspx#countryReports</a></li> <li>• Freedom house: <a href="https://freedomhouse.org/report/freedom-world/freedom-world-2016">https://freedomhouse.org/report/freedom-world/freedom-world-2016</a></li> <li>• Committee to Protect Journalists <a href="https://www.cpj.org/reports/2014/04/impunity-index-gettingaway-with-murder.php">https://www.cpj.org/reports/2014/04/impunity-index-gettingaway-with-murder.php</a></li> <li>• Human Rights Watch: <a href="http://www.hrw.org/world-report/2015">http://www.hrw.org/world-report/2015</a></li> <li>• Global Witness: <a href="http://www.globalwitness.org">www.globalwitness.org</a></li> <li>• Chatham House Illegal Logging Indicators Country Report Card <a href="http://www.illegal-logging.info">http://www.illegal-logging.info</a></li> <li>• Amnesty International 2014/2015 report: <a href="https://www.amnesty.org/en/documents/pol10/0001/2015/en/">https://www.amnesty.org/en/documents/pol10/0001/2015/en/</a></li> <li>• Direct Request (CEACR) - adopted 2014, published 104th ILC session (2015) Equal Remuneration Convention, 1951 (No. 100) – Portugal <a href="http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:13100:0::NO::P13100_COMMENT_ID:3186668">http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:13100:0::NO::P13100_COMMENT_ID:3186668</a></li> <li>• Overview of ILO convention ratifications by Portugal: <a href="http://www.ilo.org/public/portugue/region/eurpro/lisbon/html/portugal_convencoes_numero_pt.htm">http://www.ilo.org/public/portugue/region/eurpro/lisbon/html/portugal_convencoes_numero_pt.htm</a></li> <li>• SEF Statistical Annual reports: <a href="http://sefstat.sef.pt/relatorios.aspx">http://sefstat.sef.pt/relatorios.aspx</a></li> <li>• SEF Inspective news about forest sector: <a href="http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=7018">http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=7018</a> <a href="http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=6802">http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=6802</a></li> <li>• ACT Annual Reports: <a href="http://www.act.gov.pt/(ptPT)/SobreACT/DocumentosOrientadores/RelatorioActividades/Paginas/default.aspx">http://www.act.gov.pt/(ptPT)/SobreACT/DocumentosOrientadores/RelatorioActividades/Paginas/default.aspx</a></li> </ul>
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
2.7.5	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is supplied using labour where the pay and employment conditions are fair and meet, or exceed, minimum requirements.
Finding	<p>Minimum wage is included in the Portuguese constitution (Article 59), and labour code. Portugal ratified the ILO convention on minimum wage C131 (1970) in the year 1981. Also, the convention on salary protection C95 was ratified in the year 1981.</p> <p>Payment and employment conditions are included and are updated in the labour code.</p> <p>The Authority directly involved in employment conditions is Work Conditions Authority (ACT) but for many reasons other authorities are related to the issue, like Immigration and Borders Services (SEF) social security services or even tax services. All of them can make inspections on different issues related to work, joined by police authorities like GNR-National Republican Guard and PSP-Public Security Police.</p> <p>ACT has strategic Plans for Agriculture and Forest activities and also does integrated inspections with Portuguese authorities for agriculture and forestry activities. A recent notice states that ACT acquired a drone to help agriculture and forestry inspections.</p> <p>Inspective activities of ACT and SEF result in penalties or suspensions when illegal situations are found.</p> <p>According to the available information on employment conditions, there is a legal framework in the country, and there are legal authorities to enforce legislation. It is therefore considered that Portugal has a low risk that pay and employment conditions are not fair and do not meet minimum requirements.</p>
Means of Verification	<ul style="list-style-type: none"> <li>• Legislation</li> <li>• Level of enforcement</li> <li>• Regional, publicly available data from a credible third party</li> <li>• Publicly available information (News and media)</li> </ul>
Evidence Reviewed	<p><b>Legislation:</b></p> <ul style="list-style-type: none"> <li>• Portuguese Constitution</li> <li>• Labour Code: Law No. 7/09 of 12/02 <a href="http://www.act.gov.pt/pt-PT/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx">http://www.act.gov.pt/pt-PT/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx</a></li> <li>• Dec-Law: 77/81 of 19/06 at <a href="http://www.ilo.org/public/portugue/region/eurpro/lisbon/pdf/conv_131.pdf">http://www.ilo.org/public/portugue/region/eurpro/lisbon/pdf/conv_131.pdf</a></li> <li>• Dec-Law: 88/81 of 14/07 at <a href="http://www.ilo.org/public/portugue/region/eurpro/lisbon/pdf/conv_95.pdf">http://www.ilo.org/public/portugue/region/eurpro/lisbon/pdf/conv_95.pdf</a></li> </ul> <p><b>Government sources:</b></p> <ul style="list-style-type: none"> <li>• SEF Statistical Annual reports: <a href="http://sefstat.sef.pt/relatorios.aspx">http://sefstat.sef.pt/relatorios.aspx</a></li> <li>• SEF Inspective news about forest sector: <a href="http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=7018">http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=7018</a> <a href="http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=6802">http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=6802</a></li> <li>• ACT Annual Reports: <a href="http://www.act.gov.pt/ptPT/SobreACT/DocumentosOrientadores/RelatorioActividades/Paginas/default.aspx">http://www.act.gov.pt/ptPT/SobreACT/DocumentosOrientadores/RelatorioActividades/Paginas/default.aspx</a></li> <li>• News about ACT inspective work including forest: <a href="http://www.act.gov.pt/ptPT/Itens/Noticias/Paginas/ACTeInspe%C3%A7%C3%A3odoTrabalhodeEspanhaema%C3%A7%C3%B5esconjuntas.aspx">http://www.act.gov.pt/ptPT/Itens/Noticias/Paginas/ACTeInspe%C3%A7%C3%A3odoTrabalhodeEspanhaema%C3%A7%C3%B5esconjuntas.aspx</a></li> <li>• ACT Strategic Plan for Agriculture and Forestry Activities: <a href="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">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</a></li> </ul>
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>

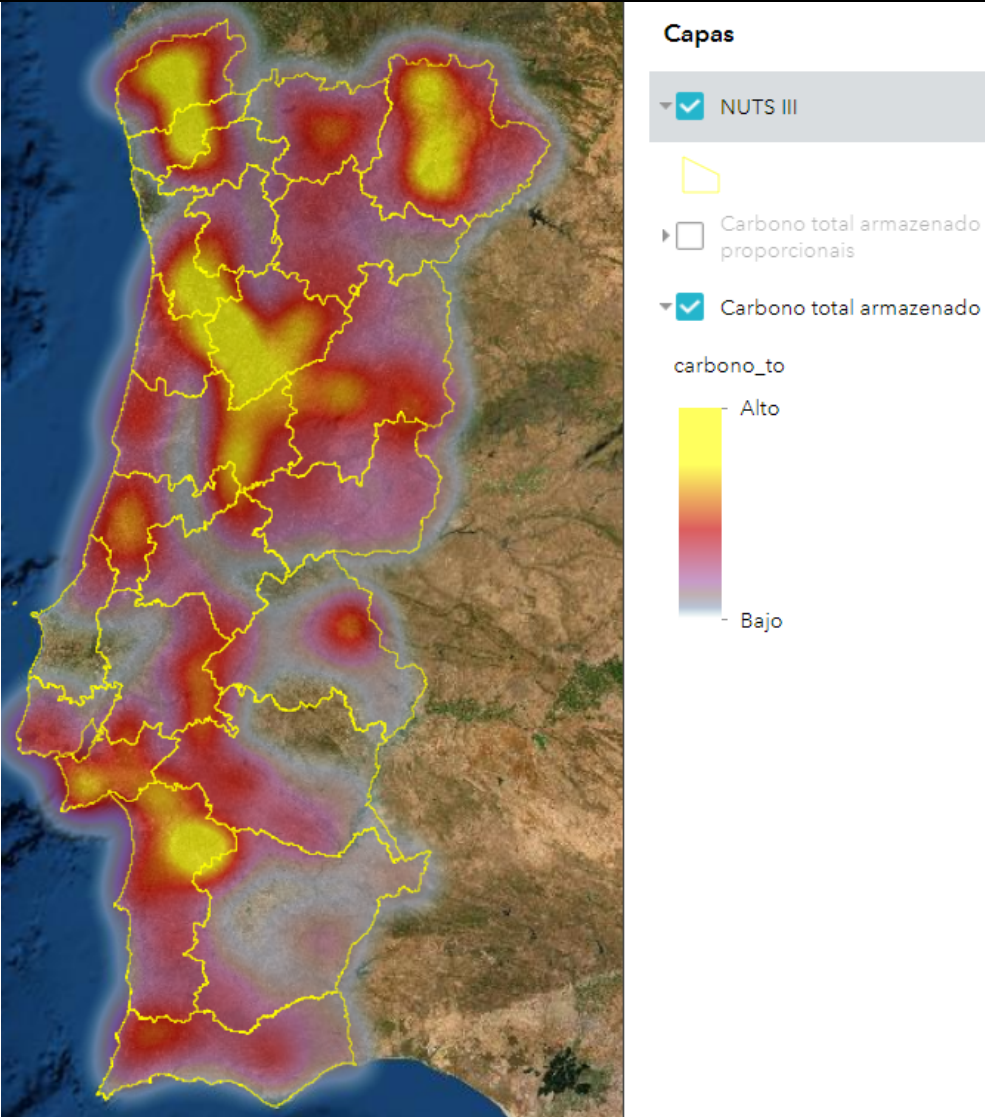
Comment or Mitigation Measure	
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	Indicator
<b>2.8.1</b>	The Biomass Producer has implemented appropriate control systems and procedures for verifying that appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12).
Finding	<p>Regardless of its legal requirements, Portugal still performs poorly on work safety. International Trade Union Confederation (IUTC) ranks countries against 97 indicators to assess where workers' rights are best protected. Portugal has a rating of 3 (from 1 to 5+). This score is given for countries where: There are 'Regular violations of rights. The government and/or companies are regularly interfering in collective labour rights. There are deficiencies in laws and/or certain practices which make frequent violations possible.'</p> <p>Portugal has ratified convention ILO 184 on 2012, about agriculture health and safety in agriculture which includes forestry activities with exception of industrial forest harvesting. ILO forestry H &amp; S code includes some of forestry activities on 'high risk operations' such as climbing above 3m, but in Portuguese legislation any forestry activity is included on legal list of 'High Risk Activity'.</p> <p>Work legislation aims to create a safe and healthy work environment at all times in accordance with society's technical and social development. Historically, a risk under this category has been present based on a low level of compliance with the requirements for accreditation and/or professional training.</p> <p>In recent years, many obligations have changed, and private entities have started to develop courses for some activities of forest workers (for example for chainsaw, machinery or phytopharmaceuticals users). Legal authority for work health and safety is ACT (Working Conditions Authority), who as an inspective role on the ground.</p> <p>ACT 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 (<a href="#">see report</a>). From the execution of this plan 6 informative leaflets were produced as well as 8 instruments for the application of the respective law framework (checklists). The plan involved the participation of several social partners as well as public partners which can be consulted in the report. An estimate of 9000 employers and employees were reached throughout the development of this plan as well as 560 associative managers and technicians.</p> <p>The plan also comprised an inspective component materialized on 1700 inspections over 3 years reaching to 10 000 workers.</p> <p>All employees of the company have annual internal and external training (operations by certified companies) on workers' safety and health.</p> <p>Based on the foregoing, the risk relating to this indicator is classified as Specified Risk.</p>
Means of Verification	<ul style="list-style-type: none"> <li>• Accredited professional courses (e.g. chainsaws, machinery operator, phytopharmaceuticals applicator) card and/or specific certificates of training sessions.</li> <li>• Records of H&amp;S procedures and Personal Protective Equipment distribution by the Organization.</li> <li>• Record of machinery safety tools and equipment on original documental register.</li> </ul>
Evidence Reviewed	<p><b>Government sources:</b></p> <ul style="list-style-type: none"> <li>• Labour Conditions Authority-ACT (<a href="http://www.act.gov.pt/(pt-PT)/Paginas/default.aspx">http://www.act.gov.pt/(pt-PT)/Paginas/default.aspx</a> •Work accident statistics from ACT  <a href="http://www.act.gov.pt/(pt-PT)/Centrolnformacao/Estatistica/Paginas/AcidentesdeTrabalhoGraves.aspx">http://www.act.gov.pt/(pt-PT)/Centrolnformacao/Estatistica/Paginas/AcidentesdeTrabalhoGraves.aspx</a>  <a href="http://www.act.gov.pt/(pt-PT)/Centrolnformacao/Estatistica/Paginas/AcidentesdeTrabalhoMortais.aspx">http://www.act.gov.pt/(pt-PT)/Centrolnformacao/Estatistica/Paginas/AcidentesdeTrabalhoMortais.aspx</a></li> </ul>

	<p><a href="http://www.act.gov.pt/(pt-PT)/crc/PublicacoesElectronicas/Documents/RelatorioAtividadesPromocaoSegurancaSaudeTrabalho2015.pdf">http://www.act.gov.pt/(pt-PT)/crc/PublicacoesElectronicas/Documents/RelatorioAtividadesPromocaoSegurancaSaudeTrabalho2015.pdf</a></p> <ul style="list-style-type: none"> <li>• General Direccion of Social Security : <a href="http://www.seg-social.pt/dgss-direccao-geral-da-seguranca-social">http://www.seg-social.pt/dgss-direccao-geral-da-seguranca-social</a></li> <li>• Employment and Professional Training Institute at (<a href="https://www.iefp.pt/">https://www.iefp.pt/</a>)</li> <li>• Strategy and Planning Cabinet: <a href="http://www.gep.msess.gov.pt/estatistica/acidentes/index.php">http://www.gep.msess.gov.pt/estatistica/acidentes/index.php</a></li> <li>• Non-Government sources</li> <li>• Safety and health in the European forestry sector – The impact of more open markets and of increased regulation: <a href="http://www.ilo.org/wcmsp5/groups/public/---ed_dialogue/---sector/documents/publication/wcms_160880.pdf">http://www.ilo.org/wcmsp5/groups/public/---ed_dialogue/---sector/documents/publication/wcms_160880.pdf</a></li> <li>• Guidelines for labour inspection in forestry: <a href="http://www.ilo.org/wcmsp5/groups/public/---ed_protect/---protrav/---safework/documents/normativeinstrument/wcms_107610.pdf">http://www.ilo.org/wcmsp5/groups/public/---ed_protect/---protrav/---safework/documents/normativeinstrument/wcms_107610.pdf</a></li> <li>• Code of Practice: Safety and Health in forestry work: <a href="http://www.ilo.org/wcmsp5/groups/public/@ed_protect/@protrav/@safework/documents/normativeinstrument/wcms_107793.pdf">http://www.ilo.org/wcmsp5/groups/public/@ed_protect/@protrav/@safework/documents/normativeinstrument/wcms_107793.pdf</a></li> <li>• ITUC Global RIGhTs Index The woRld's woRsT CoUnTRles foR workers: <a href="http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf">http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf</a></li> <li>• SETAA-Sindicato da Agricultura, Alimentação e Florestas: at <a href="http://www.setaa.pt/">http://www.setaa.pt/</a></li> <li>• UGT-União Geral de Trabalhadores at <a href="https://www.ugt.pt/">https://www.ugt.pt/</a></li> <li>• CGTP - Confederação Geral de Trabalhadores Portugueses at <a href="http://www.cgtp.pt/">http://www.cgtp.pt/</a></li> </ul> <p><b>Legislation:</b></p> <ul style="list-style-type: none"> <li>• Labor Code• Código do Trabalho :Lei n.º 7/09 12/02 artº127º i) <a href="http://www.act.gov.pt/(pt-PT)/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx">http://www.act.gov.pt/(pt-PT)/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx</a></li> <li>• Resolução da Assembleia da República nº109/2012 de 08/08 art 6º ( Convention 184 doesn't apply to industrial forest work) <a href="http://dre.pt/util/getpdf.asp?s=diad&amp;serie=1&amp;iddr=2012.153&amp;iddip=20121525">http://dre.pt/util/getpdf.asp?s=diad&amp;serie=1&amp;iddr=2012.153&amp;iddip=20121525</a></li> <li>• Aviso n.º 6/2014. 01/09 <a href="https://dre.pt/util/getpdf.asp?s=diad&amp;serie=1&amp;iddr=2014.6&amp;iddip=20140033">https://dre.pt/util/getpdf.asp?s=diad&amp;serie=1&amp;iddr=2014.6&amp;iddip=20140033</a></li> <li>• Law nº 3/2014 from 28/01 <a href="https://dre.pt/application/dir/pdf1sdip/2014/01/01900/0055400591.pdf">https://dre.pt/application/dir/pdf1sdip/2014/01/01900/0055400591.pdf</a></li> <li>• DLnº441/91, de 14/11capIII</li> <li>• DL nº133/99, de 21/04 artº1º</li> <li>• DL nº26/94, de 1/02 artº3º</li> <li>• Lei n.º 98/2009, de 04/09 artº7º</li> <li>• DLnº 128/93, de 22/04 artº1º</li> <li>• Port. 988/93, de 06/10;</li> <li>• DL nº141/95, de 14/06 artº5º</li> <li>• Portaria n.º 1456-A/95, de 11/10; artº2º</li> <li>• DL nº331/93 de 25/09, artº4º DLnº 330/93, de 25/09 artº4º</li> <li>• DL 182/2006, de 6/09 , artº4º</li> <li>• NP 2761:1988 Law 102/2009 10/09 :<a href="http://www.dgpj.mj.pt/sections/leis-da-justica/pdf-ult2/lei-n-102-2009-de-10-de/downloadFile/file/lei_102.2009.pdf?nocache=1252570336.84">http://www.dgpj.mj.pt/sections/leis-da-justica/pdf-ult2/lei-n-102-2009-de-10-de/downloadFile/file/lei_102.2009.pdf?nocache=1252570336.84</a></li> <li>• Health and Safety Guide for Agroforestry works: <a href="http://www.act.gov.pt/(pt-PT)/Itens/Noticias/Documents/Seguran%C3%A7a%20e%20Saude%20no%20Trabalho%20no%20Setor%20Agro-Florestal.pdf">http://www.act.gov.pt/(pt-PT)/Itens/Noticias/Documents/Seguran%C3%A7a%20e%20Saude%20no%20Trabalho%20no%20Setor%20Agro-Florestal.pdf</a></li> </ul>
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	BSL has a control system and adequate procedures on the health and safety of forest workers.

	<p>BSL demands the same from its feedstock suppliers and checks the health safety of harvesting personnel during its monitoring (administrative and field) inspections.</p> <ul style="list-style-type: none"> <li>• Supplier qualification process and inspections of the supplier’s administration: <ul style="list-style-type: none"> <li>○ Insurances and aptitude forms;</li> <li>○ Social Security;</li> <li>○ Present workforce and training (new) personnel;</li> <li>○ Health and safety procedures;</li> <li>○ Training records and hiring of specialists;</li> <li>○ Records of Personal Protection Equipment (PPE) distribution;</li> <li>○ Records of machinery safety tools and equipment on documental register;</li> <li>○ Medical record for employment.</li> </ul> </li> <li>• Field inspection supplier: <ul style="list-style-type: none"> <li>○ Protective equipment use;</li> <li>○ Medical kit;</li> <li>○ Fire extinguisher;</li> <li>○ Respect of safety distances;</li> </ul> </li> <li>• Level of knowledge of personnel.</li> </ul>
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	Indicator
<b>2.9.1</b>	<p>Biomass is not sourced from areas that had high carbon stocks in January 2008 and no longer have those high carbon stocks.</p>
Finding	<p>There is a specified risk of reducing high carbon stocks, but it is not a high one, and by addressing sustainable forest management and the above-mentioned indicators and risks, this indicator is adequately addressed.</p> <p>Considering the positive general trend of carbon accumulation by forests in Portugal, this risk has a regional to local (exceptional) character and is more specifically related to the risks mentioned in the following indicators:</p> <ul style="list-style-type: none"> <li>• 2.1.3 (land conversion);</li> <li>• 2.2.2 (degradation of grounds)</li> </ul> <p>According to the National Inventory Report on Greenhouse Gases 1995-2015 developed by Portuguese Environment Agency (APA), Portuguese forest acted as a carbon sink in the period of the study with a net carbon sequester of 753.2 Gigagrams.</p> <p>The high carbon stocks are considered to be in wetlands, peatlands (no forested areas related) and old mature forests stands. Information regarding wetlands in Portugal states that as usual in the region they are threatened ecosystems even when they are protected. Portugal currently has 1.8% of its territory occupied by wetlands, 79% of which is protected by the Ramsar Convention, covering this protection figure of 31 sites (about 132,487 hectares). 82% of habitats related to wetlands are degraded. Epic WebGis Portugal provides geographical information about wetlands.</p>

	 <p>The most relevant risk for carbon stocks associated to forestry are the operations harvesting of riparian vegetation in wetlands. So specified risk needs to be assessed on this issue.</p>
Means of Verification	<ul style="list-style-type: none"> <li>• Internet research</li> <li>• Field inspections</li> <li>• Regional, publicly available data from a credible third party</li> </ul>
Evidence Reviewed	<ul style="list-style-type: none"> <li>• HABEaS -Hotspot Areas for Biodiversity and Ecosystem Services; important areas for carbon storage (<a href="http://www.habeas-med.org/webgis/pt_en/">http://www.habeas-med.org/webgis/pt_en/</a>)</li> <li>• Epic WebGis Portugal ( <a href="http://epic-webgis-portugal.isa.ulisboa.pt/">http://epic-webgis-portugal.isa.ulisboa.pt/</a>)</li> <li>• Quercus NGO (<a href="http://www.quercus.pt/comunicados/2011/fevereiro/522-zonas-humidas-continuam-ameacadas-em-portugal">http://www.quercus.pt/comunicados/2011/fevereiro/522-zonas-humidas-continuam-ameacadas-em-portugal</a>)</li> <li>• Quercus NGO ( <a href="http://www.quercus.pt/comunicados-floresta/593-2013/2982-corte-de-sobreiros-em-santa-maria-da-feira-para-construcao-de-novo-parque-empresarial">http://www.quercus.pt/comunicados-floresta/593-2013/2982-corte-de-sobreiros-em-santa-maria-da-feira-para-construcao-de-novo-parque-empresarial</a>) , ( <a href="http://www.quercus.pt/comunicados/2014/junho/3707-abate-de-sobreiros-na-zona-de-proteccao-especial-do-estuario-de-tejo-em-benavente">http://www.quercus.pt/comunicados/2014/junho/3707-abate-de-sobreiros-na-zona-de-proteccao-especial-do-estuario-de-tejo-em-benavente</a>) ; ( <a href="http://www.quercus.pt/comunicados/2012/setembro/43-abate-ilegal-de-centenas-sobreiros-e-carvalhos-portugueses-no-parque-natural-do-sudoeste-alentejano-e-costa-vicentina">http://www.quercus.pt/comunicados/2012/setembro/43-abate-ilegal-de-centenas-sobreiros-e-carvalhos-portugueses-no-parque-natural-do-sudoeste-alentejano-e-costa-vicentina</a>)</li> <li>• ICNF habitat 7140; peatlands/turfeiras (<a href="http://www.icnf.pt/portal/naturaclas/rn2000/resource/docs/rn-plan-set/hab/hab-7140">http://www.icnf.pt/portal/naturaclas/rn2000/resource/docs/rn-plan-set/hab/hab-7140</a>)</li> </ul>



	<ul style="list-style-type: none"> <li>• ICNF habitat 9230; oak forests (<a href="http://www.icnf.pt/portal/naturaclas/rn2000/resource/docs/rn-plan-set/hab/hab-9230">http://www.icnf.pt/portal/naturaclas/rn2000/resource/docs/rn-plan-set/hab/hab-9230</a>)</li> <li>• A distribuição do Carvalho Português (<a href="http://naturlink.pt/article.aspx?menuid=3&amp;cid=1145&amp;bl=1&amp;viewall=true">http://naturlink.pt/article.aspx?menuid=3&amp;cid=1145&amp;bl=1&amp;viewall=true</a>)</li> <li>• MedWet Mediterranean wetlands initiative ( <a href="http://medwet.org/aboutwetlands/">http://medwet.org/aboutwetlands/</a>)</li> <li>• Inventario Florestal Nacional IFN5 (FloreStat_IFN5); ICNF portal (<a href="http://www.icnf.pt/portal/florestas/ifn/ifn5/rel-fin">http://www.icnf.pt/portal/florestas/ifn/ifn5/rel-fin</a>)</li> <li>• Inventario Florestal Nacional IFN6, preliminary results (IFN6 - Resultados preliminares.pdf); ICNF portal Law 58/2005 29/12; Law 54/2005, at 15/11 (Artº 25º) Titularidade dos recursos hídricos (<a href="https://dre.pt/application/dir/pdf1sdip/2005/11/219A00/65206525.pdf">https://dre.pt/application/dir/pdf1sdip/2005/11/219A00/65206525.pdf</a>)</li> </ul>
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	<p>The approach to mitigating this risk:</p> <ul style="list-style-type: none"> <li>• Wood from forests converted to plantations, as also wood lands that are converted to non-forest use, in line with principle 4 of FSC Controlled Wood, are not considered SBP compliant.</li> <li>• Feedstock coming from riparian vegetation are not considered SBP compliant</li> </ul>

	Indicator
2.9.2	Analysis demonstrates that feedstock harvesting does not diminish the capability of the forest to act as an effective sink or store of carbon over the long term.
Finding	<p>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.</p> <p><i>(..) 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 Mt CO2e.</i></p> <p>Questions regarding forest fires are addressed at indicators 2.4.1 and 2.4.2. The feedstock harvesting done for gathering low quality wood and biomass can be considered to decrease the risk of forest fires and thus positively influences this indicator.</p> <p>National Inventory data indicate that the forests of Portugal are a significant carbon sink, plagued, however by forest fires. The commercial activities of BSL and the biomass sector in general stimulate the performance of timely thinnings, cleaning accumulated organic debris from eucalyptus stands, and using low grade forest harvest residues. This stimulates the growth of forest stands and decreases the risk of fire. The feedstock does not come from riparian vegetations in wetlands.</p> <p>Based on the foregoing, the risk relating to this indicator is classified as Low Risk.</p>
Means of Verification	<ul style="list-style-type: none"> <li>• Results of analysis</li> <li>• Regional, publicly available data from a credible third party</li> <li>• The existence of a strong legal framework in the region.</li> <li>• Interviews/contacts with experts</li> </ul>
Evidence Reviewed	<ul style="list-style-type: none"> <li>• Estratégia Nacional das Florestas (RCM n.º 6-B/2015 - Diário da República n.º 24/2015, 1º Suplemento, Série I de 2015-02-04); ICNF portal (<a href="http://www.icnf.pt/portal/icnf/docref/enf">http://www.icnf.pt/portal/icnf/docref/enf</a>)</li> <li>• Relatório-de-Characterização-da-Fileira-Florestal-2014(<a href="http://www.aiff.org.pt/assets/Relatorio-de-Characterizacao-da-Fileira-Florestal-2014-160p-CAPA-3-spread....pdf">http://www.aiff.org.pt/assets/Relatorio-de-Characterizacao-da-Fileira-Florestal-2014-160p-CAPA-3-spread....pdf</a>)</li> </ul>

	<ul style="list-style-type: none"> <li>Portuguese National Inventory Report on Greenhouse Gases 1990 – 2013</li> <li><a href="http://www.apambiente.pt/_zdata/Inventario/NIR_global_20151030_UNFCCC.pdf">http://www.apambiente.pt/_zdata/Inventario/NIR_global_20151030_UNFCCC.pdf</a></li> </ul>
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	

	Indicator
<b>2.10.1</b>	Genetically modified trees are not used.
Finding	<p>In Portugal there is not a specific legal framework for GMO trees, but for all vascular plants. This legislation doesn't prohibit commercial use of GMO plants which is legal in the country since 1999. However, only corn (maize) is cultivated (around 6% of the total production). 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.</p> <p>The company (Stora Enso) is no longer in Portugal but is still an industrial global pulp and paper player with interests in GMO.</p> <p>Based on the foregoing, the risk relating to this indicator is classified as Low Risk.</p>
Means of Verification	<ul style="list-style-type: none"> <li>List of species used.</li> <li>EU Register of authorized GMOs <a href="http://ec.europa.eu/food/dyna/gm_register/index_en.cfm">http://ec.europa.eu/food/dyna/gm_register/index_en.cfm</a></li> </ul>
Evidence Reviewed	<ul style="list-style-type: none"> <li>DL 55/2015 at 17/04 <a href="http://apambiente.pt/_zdata/Politic/MGM/DL%2055_2015.pdf">http://apambiente.pt/_zdata/Politic/MGM/DL%2055_2015.pdf</a></li> <li>DL 72/2003 de 10/04 (<a href="http://apambiente.pt/_zdata/Politic/OGM/DL_72_2003.pdf">http://apambiente.pt/_zdata/Politic/OGM/DL_72_2003.pdf</a>)</li> <li>APA-Agência Portuguesa de Ambiente at webpage: <a href="http://apambiente.pt/index.php?ref=16&amp;subref=85&amp;sub2ref=430">http://apambiente.pt/index.php?ref=16&amp;subref=85&amp;sub2ref=430</a></li> <li>DGAV- Direcção Geral de Alimentação e Veterinária webpage: <a href="http://www.dgv.min-agricultura.pt/portal/page/portal/DGV/genericos?generico=3665233&amp;cboui=3665233">http://www.dgv.min-agricultura.pt/portal/page/portal/DGV/genericos?generico=3665233&amp;cboui=3665233</a></li> <li>Plataforma Transgénicos Fora at <a href="http://stopogm.net/ensaios">http://stopogm.net/ensaios</a></li> <li>EU Register of authorised GMOs <a href="http://ec.europa.eu/food/dyna/gm_register/index_en.cfm">http://ec.europa.eu/food/dyna/gm_register/index_en.cfm</a></li> <li>Global Forest Registry: <a href="http://www.globalforestregistry.org/">http://www.globalforestregistry.org/</a></li> </ul>
Risk Rating	<input checked="" type="checkbox"/> <b>Low Risk</b> <input type="checkbox"/> <b>Specified Risk</b> <input type="checkbox"/> <b>Unspecified Risk at RA</b>
Comment or Mitigation Measure	