



Supply Base Report: **Bimatra bvba**

Reinstatement Audit

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Completed in accordance with the Supply Base Report Template Version 1.4

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

Document history

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Annex 1: Detailed findings for Supply Base Evaluation indicators

1 Overview

Producer name:	Bimatra bvba
Producer address:	6 Industrielaan str., 8770 Ingelmunster, Belgium
SBP Certificate Code:	SBP-07-45
Geographic position:	50.931600, 3.247000
Primary contact:	Bart De Clerck,+32 (0) 566 628 71,bart@bimatra.be
Company website:	https://www.bimatra.be
Date report finalised:	12 Dec 2022
Close of last CB audit:	12 Dec 2022
Name of CB:	Preferred by Nature OÜ
SBP Standard(s) used:	SBP Standard 4: Chain of Custody, SBP Standard 1: Feedstock
Compliance Standard:	SBP Standard 2: Verification of SBP-compliant Feedstock, SBP Standard 5: Collection and Communication of Data Instruction
Weblink to Standard(s) used:	https://sbp-cert.org/documents/standards-documents/standards
SBP Endorsed Regional Risk Assessment:	Not applicable
Weblink to SBR on Company website:	N/A

[illegible]

2 Description of the Supply Base

2.1 General description

Feedstock types: Primary

Includes Supply Base evaluation (SBE): Yes

Feedstock origin (countries): Belgium

2.2 Description of countries included in the Supply Base

Country: Belgium

Area/Region: Belgium

Exclusions: No

Description: All country

2.3 Actions taken to promote certification amongst feedstock supplier

Bimatra holds an PEFC certification as a participant in product group certification CoC. This means that Bimatra is committed to promote the principles of certification. The main suppliers are already certified (the ones which provide around 80% of wood traded by Bimatra).

A powerpoint short presentation was draft in order to explain the SBP certification and a meeting was held in 2019 at the beginning of the certification procedure.

2.4 Quantification of the Supply Base

Supply Base

- a. **Total Supply Base area (million ha):** 0,69
- b. **Tenure by type (million ha):** 0.40 (Privately owned), 0.29 (Public)
- c. **Forest by type (million ha):** 0.69 (Temperate)
- d. **Forest by management type (million ha):** 0.45 (Managed natural), 0.24 (Plantation)
- e. **Certified forest by scheme (million ha):** 0.30 (PEFC), 0.02 (FSC)

Describe the harvesting type which best describes how your material is sourced: Thinning

Explanation: In most of the forests, most of the woodlands and most of the non-forest areas thinnings are performed as Belgium forest laws do not allow clear cuts and furthermore require silvicultural cut. Different situation is in the poplar stands, where the final harvest is performed at the end of one cycle but it is preparatory for another cycle.

Was the forest in the Supply Base managed for a purpose other than for energy markets? Yes - Majority

Explanation: Forest lots and poplar lots are managed to produce logs in the first place and that is what economically sustains the all operations. Biomass is only sourced from branches, undersized logs, defective stems, dead trees and similar low quality timber.

For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling? Yes - Majority

Explanation: In any felling licence there is normally a mandatory clause of re-planting (usually within 1 year) and the fulfillment is checked by the forest officers.

Was the feedstock used in the biomass removed from a forest as part of a pest/disease control measure or a salvage operation? Yes - Minority

Explanation: Only in the cases of die-off of coniferous stands or part of stands, as a salvage operation. Less than 10% of the feedstock.

Feedstock

Reporting period from: 01 Dec 2021

Reporting period to: 30 Nov 2022

- a. **Total volume of Feedstock:** 1-200,000 tonnes
- b. **Volume of primary feedstock:** 1-200,000 tonnes
- c. **List percentage of primary feedstock, by the following categories.**
 - Certified to an SBP-approved Forest Management Scheme: 0%
 - Not certified to an SBP-approved Forest Management Scheme: 80% - 100%
- d. **List of all the species in primary feedstock, including scientific name:** Picea abies (N/A); Populus x euramericana (N/A); Populus nigra (N/A); Salix alba (N/A); Quercus robur (N/A); Fraxinus excelsior (N/A); Alnus glutinosa (N/A); Ulmus minor (N/A); Robinia pseudoacacia (N/A); Tilia cordata (N/A); Fagus sylvatica (N/A); Betula pendula (N/A); Acer campestre (N/A); Pinus sylvestris (N/A); Pinus nigra (N/A); Carpinus betulus (N/A); Populus alba (N/A); Quercus rubra (N/A);
- e. **Is any of the feedstock used likely to have come from protected or threatened species?** No
 - Name of species: N/A
 - Biomass proportion, by weight, that is likely to be composed of that species (%): N/A
- f. **Hardwood (i.e. broadleaf trees): specify proportion of biomass from (%):** 70,00
- g. **Softwood (i.e. coniferous trees): specify proportion of biomass from (%):** 30,00
- h. **Proportion of biomass composed of or derived from saw logs (%):** 0,00
- i. **Specify the local regulations or industry standards that define saw logs:** Non applicable
- j. **Roundwood from final fellings from forests with > 40 yr rotation times - Average % volume of fellings delivered to BP (%):** 0,00
- k. **Volume of primary feedstock from primary forest:** 0 N/A
- l. **List percentage of primary feedstock from primary forest, by the following categories. Subdivide by SBP-approved Forest Management Schemes:**
 - Primary feedstock from primary forest certified to an SBP-approved Forest Management Scheme: N/A
 - Primary feedstock from primary forest not certified to an SBP-approved Forest Management Scheme: N/A
- m. **Volume of secondary feedstock:** 0 N/A
 - Physical form of the feedstock: N/A

n. **Volume of tertiary feedstock:** 0 N/A

- Physical form of the feedstock: N/A

Proportion of feedstock sourced per type of claim during the reporting period				
Feedstock type	Sourced by using Supply Base Evaluation (SBE) %	FSC %	PEFC %	SFI %
Primary	100,00	0,00	0,00	0,00
Secondary	0,00	0,00	0,00	0,00
Tertiary	0,00	0,00	0,00	0,00
Other	0,00	0,00	0,00	0,00

3 Requirement for a Supply Base Evaluation

Is Supply Base Evaluation (SBE) is completed? Yes

A SBE is required because Bimatra is buying from different sources, that are not all PEFC/FSC certified, or otherwise certified. They also buy from small scale landowners, private or state, sometimes directly and sometimes indirect. There is thus a wide variety of a supply base and this require a detailed evaluation to identify risks and, in case, to mitigate them.

4 Supply Base Evaluation

4.1 Scope

Feedstock types included in SBE: Primary

SBP-endorsed Regional Risk Assessments used: Not applicable

List of countries and regions included in the SBE:

Country: Belgium

Indicator with specified risk in the risk assessment used:

2.1.1 The BP has implemented appropriate control systems and procedures for verifying that forests and other areas with high conservation value in the Supply Base are identified and mapped.

Specific risk description:

Forests and other areas with high conservation values are identified and mapped.

Country: Belgium

Indicator with specified risk in the risk assessment used:

1.3.1 The BP has implemented appropriate control systems and procedures to ensure that feedstock is legally harvested and supplied and is in compliance with EUTR legality requirements.

Specific risk description:

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

Country: Belgium

Indicator with specified risk in the risk assessment used:

2.1.2 The BP has implemented appropriate control systems and procedures to identify and address potential threats to forests and other areas with high conservation values from forest management activities.

Specific risk description:

Identify and address potential threats to forests and other areas with high conservation values from forest management activities

Country: Belgium

Indicator with specified risk in the risk assessment used:

2.2.1 The BP has implemented appropriate control systems and procedures to verify that feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them.

Specific risk description:

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

Country: Belgium

Indicator with specified risk in the risk assessment used:

2.2.3 The BP has implemented appropriate control systems and procedures to ensure that key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).

Specific risk description:

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

Country: Belgium

Indicator with specified risk in the risk assessment used:

2.2.4 The BP has implemented appropriate control systems and procedures to ensure that biodiversity is protected (CPET S5b).

Specific risk description:

Biodiversity is protected (CPET S5b).

4.2 Justification

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

- Applicable legislation and regulations;
- Centralized National Risk Assessment (CNRA) for Belgium published in May 2017 which is available from FSC. The CNRA was completed in accordance with SBP Standard no. 1 and the evaluation was completed in accordance with SBP standard no. 2;
- Publications of national organizations and authorities;
- Scientific studies;
- Interviews with relevant persons.

Besides that, the SBR and SBE were published in 2019 for stakeholder consultation.

Based on the CNRA Bimatra concluded that the supply base do not need to be divided into various types of sub scopes. The following consideration took place, where different types of potential sub-scopes were assessed:

- - Type of feedstock: 4 feedstocks types are taken into account for this SBP certification process and all of them are producing woodchips. Sub-scope is not needed as risks are the same for all.
- - Raw material: all woodchips are made from either low-grade stemwood or branches, and they are coming from the entire supply base. There is no need of sub-scopes as risks are the same for all, as woodchips are produced from trees.
- - Geographical base: the supply base is Belgium as a whole. The risk assessment is already done for the entire country. Not a proper sub-scope as risks are the same for the entire supply base.

4.3 Results of risk assessment and Supplier Verification Programme

The risk assessment in 2020 update identified six (6) specified risks, already with mitigation measures in place (some even before SBP certification).

The risk assessment in 2021 identified 0 new risks, as the situation is the same as 2020.

Supplier verification programme was not applicable, as there were no unspecified risks.

4.4 Conclusion

Every indicator was evaluated at the level of the 3 regions that compose Belgium (Flanders and Wallonia, plus Brussels region). Many sources of information were used to assess each indicator, regarding the scope of this SBE. It was evaluated that Bimatra meets SBP requirements.

For few indicators potential risks were found, but Bimatra had implemented some standard operational procedures for mitigating these risks, some of them even before willing to achieve the SBP certification.

As an overview the SBE concluded that:

- · Laws and regulations on forestry in Belgium within the Supply Base protect the environment well and the system of law enforcement is strong and effective, since the felling licence is always required for any lot;
- · Woodchips mainly come from forest stands subject to silvicultural operations, including replantation (for example if final harvest of some plots is performed in coniferous forests); the ecological, economic and social impact of these operations are positive, since they are aimed to maintenance of the whole forests or woodlands;
- · Woodchips also come from plantations (poplars) that usually are re-planted at local level;
- · Bimatra only trades common tree species and not protected species;
- · Bimatra has several years of experience in the field and holds PEFC/FSC certificates;
- · Some procedures to minimize impacts and mitigate risks were already in place even before the SBP certification and were just improved or extended (e.g. Contractors manual, Forest Management Practices).

A kind of weakness could be that at the beginning of Bimatra's process of SBP certification there were no other evaluation for Belgium, other than CNRA. The lack of data and reports in Belgium, thus, doesn't

mean that procedures are not implemented. Standard forest operations are subject to strict control by forest officers, according to felling licences that are always issued.

The team that worked on the SBE strongly believe that the Biomass Producer Bimatra can ensure its feedstock sourced in Belgium can comply with the SBP Standards requirements on legality and sustainability.

5 Supply Base Evaluation process

Bimatra in 2019 contracted the Forestry Service Group to assist with the SBE. They were also working with FSC international to compile CNRAs for many countries around the world, including Belgium. They have 25 years of experience in this type of work.

The CNRA has been completed by FSC international in 2017 and the actual work was carried out by several expert-contractors. The CNRA process is a lengthy one that takes more than a year to complete. The process include stakeholder consultation and the risk assessment was done in a team effort where international consultant work with a larger group of local experts. It included a public consultation round as well. All information about the procedures and results can be found here: <https://fsc.org/en/document-centre/documents/resource/397>

As it appears from the CNRA, a low risk has been identified for all 5 main categories and all 32 underlying indicators.

The CNRA for Belgium was originally used in 2019 as the backbone of this document. One consultant was involved in supervising documents in 2019 and updating the 2020 and 2021 documents: Simona Ferutta, M.Sc. in Forestry and Environmental Sciences, 25 years of experience in forestry and various certification (ISO, PEFC, FSC, ISCC, SBP).

6 Stakeholder consultation

The first consultation was made in 2019.

No further consultation was made after that, but any comment will be taken into consideration by Bimatra.

6.1 Response to stakeholder comments

Description: All Stakeholders

Comment: No response were received at the end of the consultation period in 2019

Response: Any later comment will be taken into account anyway.

7 Mitigation measures

7.1 Mitigation measures

Country:	Belgium
Specified risk indicator:	2.1.1 The BP has implemented appropriate control systems and procedures for verifying that forests and other areas with high conservation value in the Supply Base are identified and mapped.
Specific risk description:	Forests and other areas with high conservation values are identified and mapped.
Mitigation measure:	

Although this indicator is low risk for the protected areas it can still happen that HCV's are found outside these areas. Thus there is a system in place to respond to such requirement. In the contractors manual the BP states that forest and landowners are obliged to inform him if their lands are located in one of these sites and/or if any HCVs are present. Besides that these informations about each wood chipping are collected in BIMATRA form 'Feedstock checklist' and actions are taken subsequently consequently.

Besides governative forest officers both in Wallonia and Flanders supervise works in every forest lot and poplar lots, especially in protected areas. They check if every requirement of the felling licence is fulfilled, including mandatory rules about HCV, habitats, conservation measures.

The HCV&Biodiversity website (Open source database "GRAS") is used to screen the forests and if forest site is overlapped with an area with HCV identified, the material is rejected.

Country:	Belgium
Specified risk indicator:	1.3.1 The BP has implemented appropriate control systems and procedures to ensure that feedstock is legally harvested and supplied and is in compliance with EUTR legality requirements.
Specific risk description:	Feedstock is legally harvested and supplied and is in compliance with EUTR legality requirements
Mitigation measure:	Bimatra has implemented appropriate control systems and procedures to ensure that the EUTR compliance is applied to all lots. Bimatra has a buying procedure in place, which includes collection of datas and informations about legal requirements.

See buying procedure of every lot, 'Aankoop procedure' and 'Feedstock checklist' spreadsheets.

Country: Belgium

Specified risk indicator: 2.1.2 The BP has implemented appropriate control systems and procedures to identify and address potential threats to forests and other areas with high conservation values from forest management activities.

Specific risk description: Identify and address potential threats to forests and other areas with high conservation values from forest management activities

Mitigation measure:

The HCVs 1, 2, 3, 4 and 6 are considered by the Forest Services in the process of issuing the felling licences for forest lots and poplar stands and those requirements and restrictions are checked on the field, as forest officers both in Wallonia and Flanders supervise works in every forest lot and poplar lots, checking if any requirement of the felling licence is fulfilled, including mandatory rules about HCV, habitats, conservation measures.

The Royal Belgian Institute of Natural Sciences in its 2014, Fifth National Report of Belgium concluded that threats from regular Forest Management activities as such are not causing major risks for HCVs in Belgium.

For non-forest areas in the contractors manual there is a part about risk assessment. With this assessment, potential risks while harvesting are identified as part of the company 'good practises'.

The HCV&Biodiversity website (Open source database "GRAS") is used to screen the forests and if forest site is overlapped with an area with HCV identified, the material is rejected.

Country: Belgium

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

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

Mitigation measure:

The (regional) competent authorities for harvesting planning and harvesting permits are the Agency for Nature and Forests (Flanders) and the Department of Nature and Forests (Wallonia). The forest and nature administrations are involved in the approval of management plans, granting of harvesting permits, sales of wood from public forests, and field verification of harvesting operations in every lot.

For private forest in Wallonia and for non-forest sites in the contractors manual there is a part about risk assessment. With this assessment potential risks while harvesting should be identified as part of the company

'good practises'. These informations about each wood chipping are collected in BIMATRA form 'Feedstock checklist' and actions are taken subsequently consequently.

Country:	Belgium
Specified risk indicator:	2.2.3 The BP has implemented appropriate control systems and procedures to ensure that key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).
Specific risk description:	Key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).
Mitigation measure:	Belgium properly implemented the regulations that were needed to protect species, biodiversity and habitats, from a legislation point of view. Online map systems are publically available. The Biomass Producer should rely on existing laws and regulations with regards to this topic. In principle 'ecosystems and habitats' should be conserved when following normal regulations in Belgium. This is also confirmed by CNRA indicators 3.3 (Ecosystems and habitats), which is low risk. The law enforcement is effective in Belgium (see full assessment under CNRA HCV 1). Besides, potential risks while harvesting are identified as part of the forest management 'good practises' followed by harvesting teams. Informations about each wood chipping are collected in BIMATRA form 'Feedstock checklist' and actions are taken subsequently consequently. The HCV&Biodiversity website (Open source database "GRAS") is used to screen the forests and if forest site is overlapped with an area with HCV identified, the material is rejected.

Country:	Belgium
Specified risk indicator:	2.2.4 The BP has implemented appropriate control systems and procedures to ensure that biodiversity is protected (CPET S5b).
Specific risk description:	Biodiversity is protected (CPET S5b).
Mitigation measure:	Based on the <i>National</i> Biodiversity Strategy each region developed its own <i>regional</i> strategic documents and action plans in relation to biodiversity and those requirements are taken into account in the felling licences. There are no CITES (tree/wood) species occurring in Belgian forests. Other potential risks while harvesting in non-forest areas are identified as part of the company 'good practises'. These informations about each

wood chipping are collected in BIMATRA form 'Feedstock checklist' and actions are taken subsequently consequently.

7.2 Monitoring and outcomes

Bimatra has in place a monitoring procedure for every lot where SBP-compliant biomass potentially could come from. The monitoring procedure includes filling in a 'Buying procedure' on excel files, with many spreadsheets such as 'Feedstock checklist' spreadsheet, which contains information about:

- · Traceability and Due Diligence evidence;
- · Issues related to sustainability, protected areas and ecosystems, HCV;
- · Health and Safety;
- · Legal obligations;
- · Certification claims;
- · Control documents (example: port agency files).

If, after implementation of the monitoring procedure, the required information and/or documentation is not provided in due time, then feedstock is not sold as SBP-compliant, but as other material to different customers. If some legal requirement (not only documentation) is missing, the timber/wood is not bought at all.

Once a year the review of mitigation measures for specified risks is done and findings recorded in the Management Review.

Monitoring of mitigation measures results 2021:

- 100% of lots subject to data collection about origin and transport;
- 100% of sites of origin checked with aerial view and screenshots saved;
- only 10 lots out of 135 (meaning 7%) were double-checked against the presence of protected priority habitats: 0 were recognized as priority habitats;
- EUTR compliance assured for every lot (100%)
- SBP mass balance checked by SBP client;
- 'Bimatra Instructions for forest operators' integrated and updated.

8 Detailed findings for indicators

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

Is RRA used? No

9 Review of report

9.1 Peer review

Peer review done by certifications consultant

9.2 Public or additional reviews

Not applicable

10 Approval of report

Approval of Supply Base Report by senior management			
Report Prepared by:	Bart De Clerck	Manager	30 Nov 2022
	Name	Title	Date
The undersigned persons confirm that I/we are members of the organisation's senior management and do hereby affirm that the contents of this evaluation report were duly acknowledged by senior management as being accurate prior to approval and finalisation of the report.			
Report approved by:	Bart De Clerck	Manager	12 Dec 2022
	Name	Title	Date

Annex 1: Detailed findings for Supply Base Evaluation indicators

	Indicator
1.1.1	The BP Supply Base is defined and mapped.
Finding	The Biomass Producer's Supply Base is defined as Belgium (both Flanders and Wallonia regions countryside, plus Brussels region).
Means of Verification	· Bimatra lots database with all Supply base data. · Records with each harvesting/trading contract; maps/locations, invoices, transport documents, claim documents (if any).
Evidence Reviewed	· Bimatra Management Manual · Bimatra SBE document. · Bimatra lots database. · Records with each harvesting/trading contract.
Risk Rating	Low Risk
Comment or Mitigation Measure	Not Applicable

	Indicator
1.1.2	Feedstock can be traced back to the defined Supply Base.
Finding	Feedstock informations can be found in Excel files and other records that Bimatra collects for every lot, including geographic coordinates and a map/location along the normal

	supply base information. When buying from other traders documentation also include information about origin and SBP-approved Forest Management Schemes, if any, and other accepted claims (like FSC). In this way all feedstock can be traced till the moment it enters the port facility of Gent (and the ownership transfers to the customer). All supplies without claims, or any supply without traceability documents in due time will not be used as SBP. Bimatra management procedures and documents are prepared for such recordings.
Means of Verification	· Bimatra annual database (Excel) with all Supply base data. · Records with each harvesting/trading contract; maps/locations, invoices, claim documents.
Evidence Reviewed	· Bimatra Management Manual · Bimatra SBE document. · Bimatra lots database. · Records with each harvesting/trading contract.
Risk Rating	Low Risk
Comment or Mitigation Measure	Not Applicable

	Indicator
1.1.3	The feedstock input profile is described and categorised by the mix of inputs.
Finding	References can be found in chapter 2 of the SBE and the Bimatra databases. The feedstock types are 4: 1 – thinnings in forests/woodlands; 2 – final harvest from plantations (mainly poplar plantations);

- 3 – other trees from parks and landscape (not fitting the FAO definition of forest);
- 4 – final harvest from forests.

The informations about the feedstock type are collected when filling the documents of the buying procedure such as 'Aankoop procedure' and 'Feedstock checklist' spreadsheets.

Input profiles can be described and are categorised by the mix of inputs as requested in the SBE chapter 2 format.

In summary the status is as follows.

Data is extracted from the Bimatra administration.

References can be found in chapter 2 of the SBE and the Bimatra databases.

The feedstock types are 4:

- 1 – thinnings in forests/woodlands;
- 2 – final harvest from plantations (mainly poplar plantations);
- 3 – other trees from parks and landscape (not fitting the FAO definition of forest);
- 4 – final harvest from forests.

The informations about the feedstock type are collected when filling the documents of the buying procedure such as 'Aankoop procedure' and 'Feedstock checklist' spreadsheets.

Input profiles can be described and are categorised by the mix of inputs as requested in the SBE chapter 2 format.

In summary the status is as follows.

Data is extracted from the Bimatra administration.

A	B	C	D	E	F	G	M
#	Feedstock type for biomass product ion	Origin	Physical Description	Count ry of harve st (new row for each	Raw mass as receive d in metric tonnes	Moist ure % as receiv ed	Specify any pre-processi ng. (chippin g, drying,

					count ry)		none)
	(weigh ted averag e, single figure) ²						
	1	Thinning from (semi- natural forests	Resid ues withou t stump s (e.g. branc hes and tops)	Chips	Belgiu m	6573,9 00	chipping
	2	Final harvest from plantatio ns	Resid ues withou t stump s (e.g. branc hes and tops)	Chips	Belgiu m	17569, 410	chipping
	3	Other trees from parks or landsca pe	Resid ues withou t stump s (e.g. branc hes and tops)	Chips	Belgiu m	4146,3 50	chipping
	4	Final harvest from (semi-	Resid ues withou t	Chips	Belgiu m	2332,5 70	chipping

	)natural stump forests s (e.g. branc hes and tops)
Means of Verification	Bimatra lots database (Excel) - Records with each harvesting/trading contract; maps/locations, invoices, claim documents. - SAR document.
Evidence Reviewed	- Bimatra Management Manual - Bimatra SBE document. - Bimatra lots database and feedstock groups attribution - Records with each harvesting/trading contract. - SAR document.
Risk Rating	Low Risk
Comment or Mitigation Measure	Not Applicable

	Indicator
1.2.1	The BP has implemented appropriate control systems and procedures to ensure that legality of ownership and land use can be demonstrated for the Supply Base.
Finding	For this the CNRA for Belgium indicator 1.1 (Land Tenure and management rights) is used and copied here. There are no elements that indicate that the forest sector in Belgium is considered a sector with major conflicts (refer to Global Witness). Belgium is a constitutional state where civil rights and property rights apply, with complaint mechanisms. There are recognized and equitable processes in place to solve conflicts related to e.g. user rights and cultural interests. In (federal) civil law and (regional) forest law, rights and interests concerning forest use and access to the forest are clearly described. Land ownership conflicts related to forests are rare. All land titles are recorded in the land registry. When a land owner rents out the land, this is recorded

	in a land lease contract, stipulating the right to use the land according to the contract but without owning it. Companies harvesting wood in the forest require valid tax registration. The business register shall confirm valid business licenses to operate within the jurisdiction. In Flanders, all companies harvesting more than 50 m³ per year need an official recognition by the forest administration ('Erkenningsregeling exploitanten'). In the procedure for approval of forest management plans, there is stakeholder consultation. The regional competent authorities (forest and nature administrations) carry out inspections of harvesting sites to confirm that harvesting takes place within property limits (including felling, transport and log landings). Belgium has a high ranking of 89.9% (2013) in regards to "rule of Law" under the World banks worldwide Governance Indicator. This is a score of 1.40 on a scale of -2.5 to +2.5. In relation to control of corruption Belgium ranks 91.9% (score of 1.63) and has a CPI of 75 in 2018 (Above the threshold of 50). Based on the strong legal framework, governance and law enforcement, and the low level of conflicts in the Belgian forest sector, the risk of infringement on land tenure rights is considered very low.
Means of Verification	· National and regional laws of Belgium. · Land register. · Business register. · Tax registration. · Inspection reports regional competent authorities (forest and nature administrations). Legally required documents or records Belgium:- Cadastre plan of lots/allotments- Property certificate with survey plan (attachment to the notarial document/deed)- Business registration documents: foundation document ('Oprichtingsakte' / 'document d' établissement') and registration thereof at the registration office of the Ministry of Finance; and enterprise identification number ('ondernemingsnummer' / 'numéro d' entreprise') Flanders:- Recognition for harvesting companies, as required under the 'Erkenningsregeling exploitanten', for companies that harvest wood from (most) public forests and for private forest owners united in 'forest groups' ('Bosgroepen') that choose to work only with recognized harvesting companies. - Harvesting permit or approved management plan, and urbanism permit in particular cases (refer to 1.4) Wallonia:- In private forests: authorization from the land owner to harvest wood- In public forests: harvesting permit ('permis d'exploiter')- An urbanism permit is required for all harvesting activities in 'agricultural zones' or 'green zones' as defined in the spatial plan ('plan de secteur').
Evidence	Applicable laws and regulations

Reviewed

CNRA Belgium

<https://fsc.org/en/document-centre/documents/resource/397>

Applicable laws and regulations

CNRA Belgium

<https://fsc.org/en/document-centre/documents/resource/397>

Belgium:

- Civil Law ('Burgerlijk Wetboek' / 'Code Civil' 21.03.1804), Book II, Title IV, art. 516-710 (goods and limits of property), specifically articles 637 and the following (customary rights);
- Wet van 4 November 1969 and subsequent amendments - Civil Law, Book III, Title VIII, Chapter II, Section 3 (rules on land lease)
- Veldwetboek / Code rural 1886, article 29;
- Boswetboek / Code forestier 1854 (Title XI);
- Wetboek van Strafvordering / Code d'instruction criminelle 17.11.1808 and more recent amendments (articles 16-21, partly abrogated).
- Law on income taxes ('Wetboek van de Inkomstenbelastingen' / 'Code des impôts sur les revenus') 1992 - including Title IX. 'Kadastraal inkomen van onroerende goederen' / 'Le revenu cadastral des biens immobiliers'

Specifically for Flanders:

- Forest Decree 1990 (Chapter IX), art. 51 (rights of forest use) and art. 10 (accessibility of the forest)
- Besluit erkenning exploitanten 2002 (recognition of companies harvesting wood)

Specifically for Wallonia:

- Décret du 15 juillet 2008 relatif au Code forestier (Forest Code)
- Code des droits d'enregistrement, d'hypothèque et de greffe, Title I. Droit d'enregistrement, Chapter IV, Section I. Transmissions à titre onéreux de biens immeubles (on registration fees for immovables)

Others:

	Belgium: http://financien.belgium.be/nl/over_de_fod/structuur_en_diensten/algemene_administraties/patrimoniumdocumentatie/ http://www.burgerlijkwetboek.be/ (in Dutch) http://www.droitbelge.be/codes.asp (in French) http://www.belgium.be/en/justice/ http://www.globalwitness.org http://www.belgium.be/en/justice/ (general information) Transparency International Corruption Perception Index http://www.transparency.org/cpi2018/results World World Banks Worldwide Governance Indicator http://info.worldbank.org/governance/wgi/index.aspx#reports Flanders: http://www.ejustice.just.fgov.be/cgi_loi/change_lg.pl?language=nl&la=N&table_name=wet&cn=1990061332 http://www.natuurenbos.be/nl-BE/natuurbeleid/bos/wetgeving_en_vergunning/erkenning_exploitanten; http://www.natuurenbos.be/nl-BE/Natuurbeleid/Toegankelijkheid.aspx Wallonia: http://environnement.Wallonia.be/legis/dnf/forets/foret025.htm ('Code forestier' 2008) http://ccff02.minfin.fgov.be/KMWWeb/document.do?method=view&id=347cb717-e6e1-4fc2-a753-d4e9e84d5f75#findHighlighted
Risk Rating	Low Risk
Comment or Mitigation Measure	Not Applicable

	Indicator
1.3.1	The BP has implemented appropriate control systems and procedures to ensure that feedstock is legally harvested and supplied and is in compliance with EUTR legality requirements.
Finding	For this the CNRA for Belgium indicator 1.21 (Legislation requiring due diligence/due care procedures) is used and copied here. The EUTR came into effect and became applicable in its entirety throughout the EU on 3 March 2013. The EU Timber Regulation is legally binding on all EU Member States, which are responsible for laying down effective, proportionate and dissuasive penalties and for enforcing the Regulation. Operators are monitored by monitoring organizations, whose activities are checked by the Member States' competent authorities. According to the WWF Government Barometer 2014, Belgium has made the necessary legislative changes to implement the EUTR. The EU Timber Regulation is implemented in Belgian (federal) legislation, including a set of due diligence requirements. Belgium has introduced the corresponding sanction regime through the adaptation of the (federal) law on product standards ('productnormen'). The implementation, enforcement and control (including sanctions) of the EUTR in Belgium is the responsibility of the Federal Public Service (Public Health, Security of the Food Chain, and Environment). The competent Federal Public Service investigates wood trade (in collaboration with customs offices) and there are procedures for sanctions and prosecution of companies that do not fulfil the requirements. In case of complaints (e.g. from environmental NGOs or independent observers) the Product Policy Unit alerts authorities of other EU member states (in case of transit-trade) and the European Commission. The Belgian competent authorities report (every two years) to the Commission on the application of the Regulation. For domestic wood (from Belgian forests/poplar stands/other lots): Most wood from public forests in Belgium is sold by the regional forest administrations in public 'standing stock' sales. This has as a consequence that the forest administrations are not considered as 'operators' under the EUTR. Instead, the companies harvesting in the forest (and selling harvested wood) have to comply with the Regulation. The Flemish Agency for Nature and Forests has prepared a document for forest managers and harvesting companies on how they can comply with the EUTR ('Infofiche : Toepassing van de EU Hout verordening of 'EU Timber Regulation (EUTR)' voor beheerders van natuur- en groengebieden'). Based on the (region-specific) criteria for legality applicable to wood from Belgian forests, there is a low risk for illegal wood from Belgian forests. The 'basic information' is available in the felling licence that is always needed in Belgium for cutting every lot. Other sources that could be used to judge if the EUTR implementation has an impact on legally harvested and supplied timber. For this the CNRA indicators can also be used. For example indicator 1.3, risks related to illegal timber entering the market because of 'Management and harvesting planning', is also low risk. The same thing counts for 1.4. the risk with regards to problems with 'Harvesting permits' leading to illegal timber. And there is a

	robust enough regulation system as 1.8 'Timber harvesting regulation' is also low risk. Altogether we may conclude that EUTR implementation need improvement because there is not a risk evaluation at the origin for every lot (it is assumed that the felling licence is enough). The risk is then identified as specified.
Means of Verification	- Supplier invoices, packing lists / delivery notes, and transport documents (CMR) - Information describing the timber and timber products, country of harvest, species, quantity, details of the supplier and information on compliance with national legislation - Risk assessment (concerning illegal timber) - Risk mitigation measures (additional information and verification from the supplier)
Evidence Reviewed	CNRA Belgium https://fsc.org/en/document-centre/documents/resource/397 European Union: - Regulation (EU) number 995/2010 of the European Parliament and of the Council of 20 October 2010 laying down the obligations of operators who place timber and timber products on the market ('EU Timber Regulation') - Commission Delegated Regulation (EU) No 363/2012 of 23 February 2012 (on the procedural rules for the recognition and withdrawal of recognition of monitoring organizations) - Commission implementing Regulation (EU) No 607/2012 of 6 July 2012 (detailed rules concerning the due diligence system and the frequency and nature of the checks on monitoring organizations) Belgium: - Law of 21 December 1998 on product standards to foster sustainable production and consumption patterns and to protect the environment, public health and workers - Royal Decree of 16 November 2000 (on designation of officials of the Federal Public Service Environment to carry out inspection activities) - Law of 25 April 2014, amending to the 'product standards law' of 21 December 1998 - Royal Decree of 2 July 2014 on the regulation of control measures for the enforcement of the 'product standards law' of 21 December 1998 Others:

	http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32010R0995 (Regulation (EU) number 995/2010 of the European Parliament and of the Council of 20 October 2010) http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32012R0363 (Commission Delegated Regulation (EU) No 363/2012 of 23 February 2012) http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32012R0607 (Commission implementing Regulation (EU) No 607/2012 of 6 July 2012); http://ec.europa.eu/environment/forests/pdf/list_competent_authorities_eutr.pdf http://emis.vito.be/sites/emis.vito.be/files/messages/2026/2013/FicheFSC-EUTR_NL201211.pdf http://ec.europa.eu/environment/eutr2013/index_fr.htm (in French) http://ec.europa.eu/environment/eutr2013/index_nl.htm (in Dutch) Eurostat (CN8, monthly) http://epp.eurostat.ec.europa.eu/newxtweb/setupdimselection.do http://barometer.wwf.org.uk/what_we_do/government_barometer/ http://www.illegal-logging.info/sites/default/files/uploads/ETTF2011Belgiumstatistics.pdf http://health.belgium.be/eportal/Environment/EnvironmentAndInspection/index.htm?fodnlang=en#.VFfIPrt0ycw
Risk Rating	Specified Risk
Comment or Mitigation Measure	Bimatra has implemented appropriate control systems and procedures to ensure that the EUTR compliance is applied to all lots. Bimatra has a buying procedure in place, which includes collection of datas and informations about legal requirements. See buying procedure of every lot, 'Aankoop procedure' and 'Feedstock checklist'

	spreadsheets.
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	Indicator
1.4.1	The BP has implemented appropriate control systems and procedures to verify that payments for harvest rights and timber, including duties, relevant royalties and taxes related to timber harvesting, are complete and up to date.
Finding	For this the CNRA for Belgium indicator 1.5 (Payment of royalties and harvesting fees) is used and copied here. Following indicator 1.5 this is N/A. There are no legally required forest harvesting specific fees in Belgium. Normal VAT rules are applicable (CNRA indicator 1.6). Indicator 1.6 states that: "Companies have to pay Value Added Tax on all their sales. It is legally required to print this on the invoice, and buyers would not accept an invoice without VAT specified as this would compromise their administration and tax assessments. All companies have to be registered with the Chamber of Commerce and the Tax Office. These registrations are linked so it is not possible to be registered with one and not the other. Once registered, a company is automatically requested to file their tax assessments and pay the VAT. It is not possible to do business without the correct registrations as suppliers and customers will require them". The indicator assesses the situation for Belgium as low risk.
Means of Verification	Supplier invoices
Evidence Reviewed	CNRA Belgium https://fsc.org/en/document-centre/documents/resource/397
Risk Rating	Low Risk
Comment or Mitigation Measure	Not Applicable

	Indicator
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1.5.1	The BP has implemented appropriate control systems and procedures to verify that feedstock is supplied in compliance with the requirements of CITES.
Finding	For this the CNRA for Belgium indicator 1.20 (CITES) is used and copied here. Red lists With regards to protected species the situation is well defined in Belgium. Belgium is a signatory of the Convention of Biological Diversity (CBD). On the national CBD website the red lists could be found. Such is done for each of the 3 regions separately. The CITES rules have been implemented in Belgian (federal) legislation. Compliance is checked through inspections and verifications by the Customs Office at (re-)export. Permits are handled by the Federal Public Service Health, Food Chain Safety and Environment. For wood from Belgian forests: there are no CITES (tree/wood) species occurring in Belgian forests. Therefore, there is no risk for this sub-criterion.
Means of Verification	- CITES certificate (original and valid) for species of EU-CITES Annex A - (re-)export permit/certificate
Evidence Reviewed	CNRA Belgium https://fsc.org/en/document-centre/documents/resource/397 International: Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) -Washington, 3 March 1973 European Union: Regulation (EG) number 338/97 of the Council of 9 December 1996 (and subsequent amendments) Regulation (EG) number 865/2006 of the Commission of 4 May 2006 on export regulations Regulation (EU) number 750/2013 of the Commission of 29 July 2013 (update of the Annexes, change of Regulation (EG) number 338/97 of the Council) Belgium: Law of 28 July 1981 (and subsequent amending acts) on the approval of the CITES convention and of the Annexes, as well as the amendment to the Convention of Bonn of 22 June 1979 Royal Decree of 9 April 2003 on protection of species of wild fauna and flora through control

	of the trade Others: http://www.ejustice.just.fgov.be/cgi_loi/change_lg.pl?language=nl&la=N&cn=2003040943&table_name=wet (in Dutch) http://www.ejustice.just.fgov.be/cgi_loi/change_lg.pl?language=fr&la=F&cn=2003040943&table_name=loi (in French) http://www.belgium.be/nl/leefmilieu/biodiversiteit_en_natuur/bedreigde_diersoorten/internationaal/ http://www.health.belgium.be/eportal/AnimalsandPlants/Endangeredspecies/Opvakantie/index.htm#.U-DGEuN_vp8 http://www.health.belgium.be/filestore/17982844/EU-338-1997basisverordening_17982844_nl.pdf http://www.health.belgium.be/filestore/17982846/EU-865-2006-gemodificeerde%20versie-toepassingsverordening_17982846_nl.pdf http://www.health.belgium.be/filestore/19091373_NL/Liste%20alphabétique%20complete%20-%20volledigealfabetische%20lijst.pdf www.cites.org
Risk Rating	Low Risk
Comment or Mitigation Measure	Not Applicable

	Indicator
1.6.1	The BP has implemented appropriate control systems and procedures to ensure that feedstock is not sourced from areas where there are violations of traditional or civil rights.
Finding	For this various CNRA Belgium indicators can be used. In general Belgium is a European country that complies with all European laws and regulations about civil rights. There is no known evidence of disputes or conflicts over traditional or civil use rights related to the sourcing of feedstock for biomass production. Belgium has ratified all the 8 Fundamental ILO Conventions. The status on the ILO website for all 8 Conventions is 'in force'. http://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102560 Besides that the following can be said: Indicator 1.15: Indigenous peoples rights; is declared N/A. There are no indigenous people in Belgium, according to UN definition (refer also to ILO convention 169). Indicator 1.13: Customary rights. Customary rights (erfdienstbaarheden) come into existence when a specific land use is condoned for more than 30 years. When identified these rights will be recorded on the ownership documents when the property is sold. Other customary rights may exist without having been recorded, but these generally have a limited scope (for example the right to cross the land to reach adjacent lands). If contested, customary rights can be argued and determined in a court of law. In the Walloon Region, some user rights still exist in some municipalities and are preserved even while the Forest Code did not foresee new user rights (article 48). In private forest, notarial deeds (documents) may include certain rights that are thus protected. Forest management plans are subject to stakeholder consultation prior to approval by the forest and nature administration. This should ensure that customary rights are observed during harvesting activities. Given their limited scope and legal status, infringements on customary rights are not likely and the risk is considered low (refer also to sub criterion 1.1). Indicator 2.3: The rights of Indigenous and Traditional Peoples are upheld. There are no indigenous peoples and no traditional peoples in Belgium. This is considered low risk in Belgium.

Means of Verification	Belgium: - Documents of ownership (notarial document/deed with survey plan as measured by the land surveyor) - Customary rights can exist in the form of condoned situations (e.g. a particular use of the land) that have lasted for more than 30 years ('erfdienstbaarheden' / 'servitudes'). These rights may be found on the documents of ownership.
Evidence Reviewed	CNRA Belgium https://fsc.org/en/document-centre/documents/resource/397 Civil Law ('Burgerlijk Wetboek' / 'Code Civil' 21.03.1804), Book II, Title IV, art. 516-710 (goods and limits of property), specifically articles 637 and the following on customary rights ('Erfdienstbaarheden' / 'Servitudes'); http://www.landmeters-experten.be/docs/doc%20erfdienstbaarheid.pdf
Risk Rating	Low Risk
Comment or Mitigation Measure	Not Applicable

	Indicator
2.1.1	The BP has implemented appropriate control systems and procedures for verifying that forests and other areas with high conservation value in the Supply Base are identified and mapped.
Finding	HCVs can be separated in 6 different groups, as can be found in the CNRA (indicators 3.1 till 3.6). · HCV 1 - Species diversity · HCV 2 - Landscape-level ecosystems and mosaics · HCV 3 - Ecosystems and habitats · HCV 4 - Critical ecosystem services · HCV 5 - Community needs · HCV 6 - Cultural values

Each of these groups is low risk for Belgium as a whole.

Conclusions in the CNRA in more detail:

HCV catConclusion (as stated in the CNRA, conclusions are based on about 25 pages of evidences, which we cannot all repeat here).

1Flanders: We conclude that Flanders has implemented the regulations that were needed to protect species, biodiversity and habitats, from a legislation point of view. We may also assume that the daily practise in the field, with harvesting permits and the online map systems are good enough, and publically available, to guarantee a proper implementation of laws without much room for doubts and mistakes. Besides this the law enforcement is strict enough, and effective. Biodiversity levels still need to improve, but regulations are in place. Based on the above sub-assessments we classify all source types related to Flanders as low risk.

Wallonia: We conclude that Wallonia has implemented the regulations that were needed to protect species, biodiversity and habitats, from a legislation point of view. We may also assume that the daily practise in the field, with harvesting permits and the online map systems are good enough, and publically available, to guarantee a proper implementation of laws without much room for doubts and mistakes. Besides this the law enforcement is strict enough, and effective. Biodiversity levels still need to improve, but regulations are in place. Altogether we therefore classify all source types related to Wallonia as low risk.

Brussels capital: we conclude that Brussels capital has implemented the regulations that were needed to protect species, biodiversity and habitats, from a legislation point of view. We may also assume that the daily practise in the field, with harvesting permits and the online map systems are good enough, and publically available, to guarantee a proper implementation of laws without much room for doubts and mistakes. Besides this the law enforcement is strict enough, and effective. Biodiversity levels still need to improve, but regulations are in place. Altogether we classify all source types related to Brussels Capital as low risk.

2Landscape-level ecosystems and mosaics.

There are no forest ecosystems in Belgium that meet the definition for large, landscape-level ecosystems or ecosystem mosaics that contain viable populations of the great majority of the naturally occurring species in natural patterns of distribution and abundance.

It was decided that this type of HCV is not present in Belgium. Indeed it was thought to be extremely rare in Europe, with only forests such as Bialowieza in Poland, being in this category. We classify all source types as low risk.

3Habitat levels show a mixed picture and in general still need more time to improve. However, we may conclude that Belgium properly implemented the regulations that were

needed to protect species, biodiversity and habitats, from a legislation point of view. We may also assume that the daily practise in the field, with permits and the online map systems are good enough, and publically available. This guarantees a proper implementation of laws without much room for doubts and mistakes in all 3 regions. Besides this the law enforcement is strict enough, and effective in Belgium. Based on the above sub-assessments we classify all source types as low risk.

4Forests acting as protection against erosion and flooding.

With regards to the presence of forests acting as protection against flooding and erosion, and if these are potentially threatened by forest management activities, the conclusion is that their occurrence is small in the area under assessment, and it is effectively protected from threats caused by management activities.

Forests acting as barriers for destructive fire.

There are no special forests classified and acting as barriers for destructive fire, nor is there much need to appoint such forests. Thus there is no danger that any forest management will contribute to any further increase of forest fires.

Forests acting as clean drinking water catchments and protection of water quality.

With regards to the presence of forests acting as a source for clean drinking water, and if these are potentially threatened by forest management activities, the conclusion is that they are present in the area under assessment, and they are effectively protected from threats caused by management activities. We found no further evidence or data that prove otherwise.

Based on the above sub-assessments we conclude that, for HCV 4, all of Belgium is considered low risk

5This HCV does not appear to occur in the Belgium context. No forest areas were identified that are fundamental to meeting the basic needs of local communities or indigenous people. There are no cases in literature, press or international reports to be found where this is stated different. There are also no special laws or regulations that regulate such things, which is another indication that there is no clear need for this.

Besides this no sources mention indigenous people (IP) presence in Belgium, neither the sources that give overviews, such as The Indigenous World, nor could any report or website be found mentioning or claiming IP presence or a discussion or debate about such a presence.

We classify all source types as low risk.

6Examples of cultural sites found in forests (such as archaeological sites, monuments etc.) are rarely considered critical to local community's traditional cultural identity. Besides that archaeological features are already marked and mapped by the regional agencies. These sites may be considered HCV sites, but are in practice already fully protected during forestry

operations by the forest laws. There are no cases in literature, press or international reports to be found where heritage sites seems to be threatened by forest management.

There are thus no economic incentives that would lead to, and no well-known cases of, forest management activities causing destruction or disturbing of rights/values of features of national cultural significance.

For HCV 6, all of Belgium is considered low risk.

It simply means that, when a BP follows the laws and regulations, there is no risk that HCV's are damaged. And any company or BP in Belgium has to follow the law.

Protection categories

In Flanders the following protection categories are in place: Natura2000, Biological Hotspots map (Biologische Waarderings Kaart), Speciale Beschermings Zone's (SBZ), European Bird and Habitat regulation (called VEN in Flanders), natural parks (Parcs Naturels), nature reserves, forest reserves, and one national park (de 'Hoge Kempen'). In Flanders the Spatial Structure Plan for Flanders (1997) contains 125.000 hectares (9,2 % of the total surface area of Flanders) for the Flemish Ecological Network (called VEN), consisting of Large Units of Nature and Large Units of Nature in Development. Furthermore, nature interweaving areas ('Natuurverwevingsgebieden') are designated, in which the ecological function shall sustainably be combined with agriculture, forestry and recreation. These areas shall be connected by the provinces in their spatial structure plans. Forests could also be protected because of special regulations about the protection of historical real estates (castles, etc.). Besides this forests can be protected as buffer zones around other protected areas.

More recently (2016) a new methodology is developed to score the ecological value of forests which is applied to forests that are outside the permanent forest estate (forests on land that is currently not classified as forest as a land-use category). These new actions are based on the new article 90 of the official "Bosdecreet". This scoring system looks at 5 different criteria: size, history, ecological value (existing map), desired nature & forest types (GNBS) and location related to value forests. As a result of this 'scoring' around 12.500 ha of 'most vulnerable and valuable forests' has been prepared by the Flemish government (Meest Kwetsbare Waardevolle Bossen (MKWB)). These are lands where HCVs can occur. The Flemish government has already taken the decision to increase the level of protection for those forests against permanent deforestation. It was decided in 2019 that such 'forest' will simply be considered real forest and will thus be bound by all other normal forests regulations, even when they do not have the official classification as forest.

In Wallonia the following protection categories are in place: Natura 2000, European Bird and Habitat regulation, protected natural sites (public nature reserves, recognized nature reserves, and forest reserves) and ancient forests.

In the Brussels capital region Natura2000 and Speciale Beschermings Zone's (SBZ) can be found.

In Belgium there are no forest ecosystems that are classified as a Global 200 Ecoregion. There are 9 Priority forest habitats recognised under the EU Habitats Directive (see below). There are 9 RAMSAR sites designated (all wetlands).

Nature 2000

New Nature 2000 sites in Flanders are proposed by INBO. They select and propose areas based on the EU Birds & the EU Habitats Directive. If sites are selected because of birds or habitats they will be called Speciale Beschermings Zone's (SBZ). This means that all such SBZ sites are also Nature 2000 sites. The whole procedure is regulated throughout the "Natuurdecreet" law.

In Wallonia the idea is the same, but the selection of sites is done by 8 special committees, each in its own part of Wallonia. There is no separate law; work is done according to the EU laws. Sites are officially named 'Nature 2000' sites. In total 148 sites (out of 240) are covered by a decree of designation in 2016.

Implementation of Nature 2000 in Belgium as a whole is well underway and in a similar state as compared to other EU countries (there is a 6 –year work program with detailed goals and targets).

High Conservation Value Forest in Belgium

The CNRA analyses is based on so called 'source types'. A source type is a timber/NFTP source with similar geographical and/or functional characteristics with a homogenous risk designation. These are potential sources from which timber could enter the market, and end up in the supply chain of FSC certified timber processing companies. Such source types need to be defined because risks could be different with each of them. The following source types were identified:

- Flemish Region, state owned, permanent, semi natural, forest.
- Flemish Region, military owned, permanent, semi natural, forest.
- Flemish Region, privately owned, permanent, semi natural, forest.
- Flemish Region, state owned, other lands with forests, semi natural, forest.
- Flemish Region, privately owned, other lands with forests, semi natural, forest.

- Walloon Region, state owned, permanent, semi natural, forest.
- Walloon Region, military owned, permanent, semi natural, forest.

- Walloon Region, privately owned, permanent, semi natural, forest.
- Walloon Region, state owned, other lands with forests, semi natural, forest.
- Walloon Region, privately owned, other lands with forests, semi natural, forest.
- Brussels Capital Region, state owned, permanent, semi natural, forest.
- Brussels Capital Region, privately owned, permanent, semi natural, forest.
- Brussels Capital Region, state owned, other lands with forests, semi natural, forest.
- Brussels Capital Region, privately owned, other lands with forests, semi natural, forest.

Wood with non-forest origin.

Small scale landscape elements like poplar or willows along roads or canals, or vegetation in small urban parks, or private gardens are used as feedstock by Bimatra.

Such small scale landscape elements are not considered to be forest according to the forest definition. Such sites are not even counted in the total forest areas in the country. There is also no 'forest management' as such because for these 'landscape elements' no forest management is applicable.

In the contractors manual there is a small risk assessment presented anyway in case high conservation values are encountered in these small scale landscape elements. With this assessment potential risks while harvesting can be identified. This is part of the companies 'good practises' and it is a mitigation measure (see last box below, after Risk rating).

Flanders.

In Flanders such elements are called KLE (Kleine landschapselementen, small landscape elements). In laws and regulations these KLE's are elements like berms, tree lines, water sources, dikes, grafts, shrublines, hedges, hollow roads, orchards, hedges around parcels, streams, ditches etc.

All such elements can be found on a digital map: 'De Biologische Waarderingskaart (BWK)'.

The mapping units of the Biological Valuation Map of Belgium that correspond to each type of small landscape element or vegetation and the normal maintenance of this nature (elements) are described in circular LNW / 98/01.

In the event of a proposed change to a small landscape element or vegetation, it is always necessary to check on the site to which mapping unit the element or vegetation actually corresponds! In view of the scale level and the specific conditions of the vegetation survey, not all vegetation is mapped on the sheets of the Biological Assessment Map.

Legislation: The legal provisions regarding the protection of vegetation and KLEs can be found in the Decree of 21/10/1997 on nature conservation and the natural environment (the Nature Decree), article 13.

The protection of vegetations and KLEs is further elaborated in the Decree of the Flemish Government of 23/07/1998 laying down further rules for the implementation of the Decree of 21 October 1997 on nature conservation and the natural environment (the Vegetation Decree).

The protection procedures and the description of vegetations and KLEs are included in Circular LNW / 98/01 of 10/11/1998 regarding general measures regarding nature conservation and regarding the conditions for modifying vegetation and small landscape elements according to the decision of the Flemish government of 23 July 1998 laying down further rules for the implementation of the Decree of 21 October 1997 on nature conservation and the natural environment.

The mentioned document (link above) pre-scribes the situation for each type of small scale element. In summary the conclusion is that a permit is needed in almost all cases except for very small scale elements in private gardens (like a solitary tree, then the owner only needs to 'inform' the municipality that he will remove it). In then depends on the location and surrounding of the element what will happen. In some cases environmental staff of the municipality can decide, in other cases Natuur & Bos have to be consulted and in extreme cases the minister has to make the decision. In any case the system is more than sufficient to protect HCV's that might occur in these KLE's.

Wallonia

Management of the KLE's in Wallonia is arranged in a similar way as in Flanders. A good summary and introduction website can be found here (Walloon government, in French).

But the geographical situation in general with KLE's is different. There is substantial less fragmentation of nature in Wallonia. Therefore most KLE's are actually part of forest management because they are often part of it. Besides this Wallonia does a lot to preserve and to increase KLE related nature. In 2019 the new political partners agreed to plant an additional 4000 km of traditional hedges.

Besides this there is special legislation to protect the elements. And a system of permits is in place, just like Flanders. Maps are available as well.

Like in Flanders the system is more than sufficient to protect HCV's that might occur in these KLE's.

Cultural values and Cultural Heritage Sites.

HCV 6 is present in the area under assessment. There are many registered cultural heritage sites and features in Belgium, with some of these sites found in forest reserves. Sites in Flanders and Brussels-Capital are listed on a website for public access. Another source lists the sites per Belgian province.

In Wallonia sites are managed and protected by the 'CRMSF Wallonia'. In Flanders this is the 'KCML-Flanders' and for the Brussels-Capital region this is 'KCML Brussels'. Each of the 3 regional agencies is working according to their own regulations.

All protected sites are considered by regional agencies as irreplaceable and they are strictly protected. Cultural heritage sites can be ancient graves and burial mounds, but may also include relicts of early settlements, fortifications, old bridges and roads, stone walls, etc. There are also areas with landscapes of national cultural significance. Examples of these include early industrial areas with dams, mill ponds etc.

In Belgium there are two Unesco commissions; The Flanders Unesco Commission (VUC), raised in 2003 and the 'Commission belge francophone et germanophone pour l'Unesco' raised 2006. Currently there are 11 sites listed in Belgium.

There are no Belgium sites on the UNESCO 'danger' list of 'World Heritage sites in Danger'. Belgium itself did not report any major problems with protection in their official 'cycle 1' report to UNESCO.

Examples of cultural sites found in forests (such as archaeological sites, monuments etc.) are rarely considered critical to local community's traditional cultural identity. Besides that archaeological features are already marked and mapped by the regional agencies. These sites may be considered HCV sites, but are in practice already fully protected during forestry operations by the forest laws (lit 20, 58 and 66). There are no cases in literature, press or international reports to be found where heritage sites seems to be threatened by forest management.

There are thus no economic incentives that would lead to, and no well-known cases of, forest management activities causing destruction or disturbing of rights/values of features of national cultural significance. For HCV 6, all of Belgium is considered low risk.

	Summary: In Belgium HCVs are identified and mapped in protected areas, Natura2000 sites and Cultural Heritage databases. Information is publically available. The relevant CNRA indicators indicate a low risk for these areas, but HCV can be found also in non-protected areas, then this is considered as a specified risk.
Means of Verification	· Contractors manual. · Bimatra Supply database · Public available info about protected sites and Natura2000 areas
Evidence Reviewed	CNRA Belgium https://fsc.org/en/document-centre/documents/resource/397 Code forestier 2008/ Natuur & Bos, Bosdecreet 1990, (forest law) Walloon: http://environnement.wallonie.be/legis/dnf/forets.htm Flemish: https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1003183&param=inhoud&ref=search&AVIDS= Vlaamse Codex, Natuurdecreet 1997 (Nature law) http://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1005915&param=informatie Vlaamse Codex, New nature decree 2014 (add-on) http://www.ejustice.just.fgov.be/cgi_loi/change_lg.pl?language=nl&la=N&table_name=wet&cn=2014050910 Royal Belgian Institute of Natural Sciences, 2014, Fifth National Report of Belgium, to the Convention on Biological Diversity https://www.cbd.int/doc/world/be/be-nr-05-en.doc KCML-Flanders, HVC 6 Cultural heritage map http://www.erfgoedkaart.be/?gclid=CjwKEAajwsr-6BRCLvrj785rbhTsSJADjUxak6EoZT7naR-

	hw8Lg_10GGYk0jvtEaRHZ1gDwNrxmEVRoCTxPw_wcB CRMSF Wallonia, About cultural heritage sites http://www.crmsf.be/fr KCML-Flanders, About cultural heritage sites https://www.onroerenderfgoed.be/ KCML Brussels, About cultural heritage sites http://www.kcml.irisnet.be/
Risk Rating	Specified Risk
Comment or Mitigation Measure	Although this indicator is low risk for the protected areas it can still happen that HCVs are found outside these areas. Thus there is a system in place to respond to such requirement. In the contractors manual the BP states that forest and landowners are obliged to inform him if their lands are located in one of these sites and/or if any HCVs are present. Besides that these informations about each wood chipping are collected in BIMATRA form 'Feedstock checklist' and actions are taken subsequently consequently. Besides governative forest officers both in Wallonia and Flanders supervise works in every forest lot and poplar lots. They check if every requirement of the felling licence is fulfilled, including mandatory rules about HCV, habitats, conservation measures.

	Indicator
2.1.2	The BP has implemented appropriate control systems and procedures to identify and address potential threats to forests and other areas with high conservation values from forest management activities.
Finding	The CNRA with regards to this aspect is low risk for Belgium. The HCVs 1, 2, 3, 4 and 6 are considered by the Forest Services in the process of issuing the felling licences and those requirements and restrictions are checked on the field, as forest officers both in Wallonia and Flanders supervise works in forest lots and poplar lots, checking if any requirement of the felling licence is fulfilled, including mandatory rules about HCV, habitats, conservation measures. Only non-forest areas are not fully checked, that's why this considered a specified risk. The Royal Belgian Institute of Natural Sciences in its 2014, Fifth National Report of

	Belgium concluded that threats from regular Forest Management activities as such are not causing major risks for HCVs in Belgium.
Means of Verification	- Contractors manual. - Bimatra Supply database - Bimatra forms
Evidence Reviewed	CNRA Belgium https://fsc.org/en/document-centre/documents/resource/397 Royal Belgian Institute of Natural Sciences, 2014, Fifth National Report of Belgium, to the Convention on Biological Diversity https://www.cbd.int/doc/world/be/be-nr-05-en.doc
Risk Rating	Specified Risk
Comment or Mitigation Measure	For non-forest areas in the contractors manual there is a part about risk assessment. With this assessment, potential risks while harvesting are identified as part of the company 'good practises'.

	Indicator
2.1.3	The BP has implemented appropriate control systems and procedures for verifying that feedstock is not sourced from forests converted to production plantation forest or non-forest lands after January 2008.
Finding	CNRA indicator 4. Assessment based on legality. Content of law. Flanders: The following principles apply to conversion of forest to non-forest land use (Forest Act 1990): 1. Deforestation is prohibited, except in particular cases described in the Forest Decree. (such as acts of public interests, development of residential or industrial area (if agreed on in the spatial plan), land division into zones for construction (If agreed on in the spatial plan). 4: deforestation of the parts of an allotment [for housing] for which a permit was

granted, and which is still valid, 5. for conservation objectives)

2. If deforestation is not prohibited, an urbanism permit is required.

3. An urbanism permit for deforestation or an allotment permit for forested land can only be granted if approved compensation measures are in place.

Wallonia:

According to article 38. § 1er of the Forest Code, it is prohibited to harvest (clear-cut) more than 5 hectares in stands comprised by more than 50% conifer species (based on basal area, 'grondvlak' / 'surface terrière') and 3 hectares in stands consisting of over 50% broadleaved species.

An urbanism permit is required for all harvesting activities in 'agricultural zones' or 'green zones' as defined in the spatial plan ('plan de secteur').

Flanders:

The forest administration carries out field verification of compensation measures, i.e., re-forestaion or afforestation. If the forest administration observes that the planting of trees has not succeeded, it can carry out the re-/afforestation in the place of the owner.

It is improbable that deforestation goes unnoticed in this densely populated region. The level of law enforcement is strong, with a reasonable capacity of forest guards and inspectors. Complaints by parties involved, or notifications by parties not involved to the Agency for Nature and Forests (ANB) are increasing yearly. This does not correspond with a higher level of (illegal) deforestation, but rather with increased 'social control' and the fact that citizens know who they shall notify (the agency responsible for law enforcement) in case of (alleged) infringements.

Wallonia:

While 'legal conversion' of forest to non-forest land use is still possible, it is subject to strict procedures and stakeholder consultation.

The corruption level in Belgium is considered low, refer to the Transparency International corruption perception index of 75 (higher than the threshold of 50) and given the high transparency of the procedure for granting permission for conversion (including stakeholder consultation), there is not much risk for illegal conversion. Furthermore, a large share of the forests are open to recreation, and forests are patrolled by the forest and nature administration and inspection agencies, harvesting operations are quickly noticed.

According to the participants of the FSC Belgium working groups on Controlled Wood (both Dutch and French speaking), conversion is subject to a robust authorization procedure and the level of law enforcement (including field inspections) is strong. Belgium has a high level of governance, and is densely populated. Furthermore, there

are little indications or evidence of conversion (deforestation) without permit in Belgium (refer to the ANB Handhavingsrapport for Flanders and the TBE reports for Wallonia) and those are reported as vandalism. Thus the risk can be considered low.

Assessment based on spatial data

Flanders:

According to the BOS+ report 'Bosbarometer 2012', forest area in Flanders decreased by 59 hectares in 2011. On the other hand, the Agency for Nature and Forests works with data from the new tool 'Boswijzer' which shows a net gain of forest area. Both measurement methods and figures face some criticism, but are still valuable tools according to FSC Belgium:

The Boswijzer tool looks at formal permits for (permanent) deforestation and formal reforestation, but does not take into account similar 'informal' activities (illegal deforestation is considered to be low to non-existing, 'informal' reforestation is happening a lot due to natural regeneration). The Bosbarometer tool on the other hand, is a much more overall measurement system (air photography and corrections).

According to the Flemish forest and nature law enforcement report ('ANB Handhavingsrapport 2013') little deforestation is observed (or detected) in Flanders. The infringement about deforestation (meaning lack of documents or uncorrect documents) was in a surface area about 13 hectares in 2013 (back from over 27 hectares in 2011).

Wallonia:

The Walloon regional forest inventory ('Inventaire Permanent des Ressources Forestières de Wallonie') reveals a decrease in the surface area of conifer plantations compared to the surface area of forests composed of broadleaved species ('phénomène de glissement').

The forest composition is changing and the trend is toward mixed forests rather than monospecific plantations.

According to the Global Forest Resources Assessment 2015 for Belgium prepared by FAO, the forest area in Belgium increased by 2,200 ha between the years 2010 and 2015 (from 681,200 ha to 683,400 ha). This change is related only to Wallonia, as forest areas in Flanders and Brussels remained unchanged.

In the same report, the latest available data about deforestation is from the year 2010. In 2010, 1,470 ha were deforested while 2,227 ha were reforested. Additionally, the forest expansion was 1,697 ha (1,242 ha afforestation and 455 ha natural forest expansion).

	There is no clear data available about how much natural forest was converted to plantations (if any), but the naturally regenerated forest area increased by 5,800 ha between 2010 and 2015 (from 283,400 to 289,200 ha). On the other hand, the area of planted forest decreased by 3600 ha between 2010 and 2015 (from 397,700 to 394,100 ha). Moreover, the French-speaking working group on Controlled Wood within FSC-Belgium agreed that there is no evidence of net loss of forest area. The working group composed by stakeholders from the NGO side (Natuurpunt), the industry side (Fedustria, Unilin, Norbord) and the administration side (ANB) agreed with the 'low risk' designation for Belgium for indicator 4.1. Small scale landscape elements like poplar or willows along roads or canals, or vegetation in small urban parks, or private gardens are not considered to be forest according to the forest definitions in Belgium. According to the spatial data provided above, conversion of natural forests to plantations or non-forest use in the area under assessment is below the threshold of 0.02% or 5000 hectares average net annual loss, thus the risk can be considered low.
Means of Verification	- Historical maps and discussions with stakeholders. - Regional, publicly available data from a credible third party. - The existence of a strong legal framework in the country. - Records of BP field inspections (risk assessment).
Evidence Reviewed	CNRA Belgium https://fsc.org/en/document-centre/documents/resource/397 Belgium: - Royal Decree of 28 December 1972 organization and application of spatial plans ('Gewestplannen' / 'Plans de secteur') Flanders: - Forest Act ('Bosdecreet') 1990 and subsequent amendments, Chapter VIII (on forest protection), article 90bis (on deforestation) and article 47 (on conversion in nature reserves); - B.VI.Reg. of 16.02.2001 (further regulations on deforestation) - Nature Act ('Natuurdecreet') 1997, article 36 ter, §3 (on exceptional deforestation in

Natura 2000 areas)

- Spatial plans ('Ruimtelijke Uitvoeringsplannen', RUP) at the regional, provincial and municipal levels

- Decree of the Flemish Government of 10 December 2004 determining the categories of projects subject to environmental impact assessment -Besluit van de Vlaamse regering van 10 december 2004 houdende vaststelling van de categorieën van projecten onderworpen aan milieueffectrapportage (on environmental impact assessment, e.g. in case of deforestation)

- Flemish Codex for Spatial Planning, Article 4.2.1, 3 °Vlaamse Codex Ruimtelijke Ordening, Artikel 4.2.1, 3° (on urbanism permit for deforestation)

Wallonia:

- Walloon Code of Regional Planning, Town Planning, Heritage and Energy (Decree of 19 April 2007

Code wallon de l'aménagement du territoire, de l'urbanisme, du patrimoine, et de l'énergie (Décret du 19 avril 2007) -

- ° Book I, Title III, Chapter II, Section III (on land use types and prescriptions)

- ° Title V, Chapter I (on urbanism permit and certificate) and Chapter III (procedure)

Law enforcement and spatial analysis

Belgium:

FAO (2014) Global Forest Resources Assessment 2015 – Country Report, Belgium. Rome. Available at: <http://www.fao.org/3/a-az164f.pdf> (last accessed on 05 May 2017)

Transparency International Corruption Perception Index

<http://www.transparency.org/cpi2018/results>

World World Banks Worldwide Governance Indicator

<http://info.worldbank.org/governance/wgi/index.aspx#reports>

Flanders:

- Decree of 28 June 1985 on the environmental permit (Environmental Authorization Decree 1985) - Decreet van 28 juni 1985 betreffende de milieuvergunning (Milieuvergunningsdecreet 1985)

- Decree of 5 April 1995 laying down general provisions on environmental policy (Decree General Environmental Policy Regulations 1995) - Decreet van 5 april 1995 houdende algemene bepalingen inzake milieubeleid (Decreet Algemene Bepalingen Milieubeleid 1995)

	- Decree Spatial Planning (1999) - Decreet Ruimtelijke Ordening (1999) Forest Act ('Bosdecreet') 1990 and subsequent amendments, Chapter VIII (on forest protection), article 90bis (on deforestation) and article 47 (on conversion in nature reserves); - Nature Act ('Natuurdecreet') 1997, article 36 ter, §3 (on exceptional deforestation in Natura 2000 areas) http://www.natuurenbos.be/nl-BE/natuurbeleid/bos/wetgeving_en_vergunning/erkenning_exploitanten ANB report 'Handhavingsrapport 2013' (on law enforcement) - BOS+ report 'Bosbarometer 2012' http://www.ademloos.be/sites/default/files/bos_docs/Bosbarometer_2012.pdf Wallonia: Forest Code (2008) http://environnement.wallonie.be/legis/dnf/forets.htm (Code forestier 2008) Environmental Code: http://environnement.Wallonia.be/legis/menucode.htm (Code de l' Environnement) http://wallex.Wallonia.be/index.php?doc=1423 and http://www.demeures-historiques.be/images/contents/27_8717_file.pdf Walloon Code of Regional Planning, Town Planning, Heritage and Energy (Decree of 19 April 2007 (Code wallon de l'Aménagement du Territoire, de l'Urbanisme, du Patrimoine et de l'Energie) http://environnement.wallonie.be/dnf/dagf/forets_domaniales.pdf (Cahier des charges - forêts domaniales, cf. article 48) http://environnement.wallonie.be/dnf/dagf/forets_subordonnees.pdf (Cahier des charges - forêts des administrations subordonnées) 'Inventaire Permanent des Ressources Forestières de Wallonie' (Walloon regional forest inventory) http://environnement.wallonie.be/dnf/Inventaire-forestier-wallon.pdf
Risk Rating	Low Risk
Comment or Mitigation Measure	Not Applicable

	Indicator
2.10.1	Genetically modified trees are not used.
Finding	Such is covered under CNRA indicator 5 GMO is not illegal in Belgium. All use of GM organisms, even in laboratory experiments or field trials, is subject to licenses/permits delivered by the competent federal ministry only after thorough investigation by the Biosafety Council ('Bioveiligheidsraad' / 'Conseil consultatif de Biosécurité') and after public consultation and positive advice from the competent regional minister. Currently there is no commercial use of GM trees in Belgium. There are currently 2 field trials with GM poplar trees in Flanders (by the Flemish Institute for Biotechnology, VIB) on a small surface area and on well-known locations. The project proposal was subjected to public consultation. The Biosafety Council has given positive (but conditional) advice for the trials, as the council considers the risk for human health and the environment nearly nihil - provided that strict conditions are respected. Furthermore, the Flemish Minister for Environment has given positive advice. The trials were approved, under a large number of conditions, by the federal competent Minister of Public Health and the State Secretary for Environment. Evaluation of the annual report of activities and the trial logbooks, as well as research of wood samples and inspections at the sites of the trials, showed that all required conditions were met. The Federal Public Service (FOD / SPF) Public Health, Safety of the Food Chain and Environment continues to carry out control/inspection of the strict adherence to the conditions. Even for the relatively short field trials, there are strict control measures in place: for example, the wood is cut before tree flowering takes place, there is a buffer zone with non-GMO trees, the site is fenced and the wood is destroyed after the wood is harvested for scientific analysis. Despite GMO not being illegal in Belgium, the use is highly regulated and no commercial uses are taking place in Belgium. Bimatra company is also not willing to use any Genetically modified trees, and is also not into the business of planting. Thus the risk can be considered low.

Means of Verification	EU register of authorised GMO: http://ec.europa.eu/food/dyna/gm_register/index_en.cfm Global Forest Registry: http://www.globalforestregistry.org/ European Union: Directive 2001/18/EC of the European Parliament and of the Council on the deliberate release into the environment of genetically modified organisms and repealing Council Directive 90/220/EEC - particularly relevant for the current situation in Belgium are Part B, Articles 6 - 11 on field trials Belgium: Royal Decree of 21 February 2005 concerning the deliberate introduction into the environment and the commercialization of genetically modified organisms or products containing GMOs (published in 'Belgisch Staatsblad' / 'Moniteur belge' 24 February 2005, page 7129)
Evidence Reviewed	CNRA Belgium https://fsc.org/en/document-centre/documents/resource/397 Databases on deliberate releases of GMO in Belgium http://www.biosafety.be/DTB More specifically for GM trees: http://www.biosafety.be/DTB/deliberate-releases-of-transgenic-plants/field-evaluation-of-poplars-with-an-altered-wood and http://www.biosafety.be/DTB/deliberate-releases-of-transgenic-plants/field-evaluation-of-poplars-with-a-modified-wood http://www.health.belgium.be/eportal/Environment/Biodiversity/GMOs/Legislation/index.htm#.VAYF-qP2NqQ http://www.vib.be/nl/landbouw-en-milieu/Documents/Richtlijn%202001-18-EG.pdf http://www.vib.be/populier

Risk Rating	Low Risk
Comment or Mitigation Measure	Not Applicable

	Indicator
2.2.1	The BP has implemented appropriate control systems and procedures to verify that feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them.
Finding	In principle an 'appropriate assessment of impacts, and planning, implementation and monitoring' of harvesting is always in place, when following normal regulations in Belgium. This is also confirmed by CNRA indicators 1.3 (Management and harvesting planning), 1.4 (harvesting permits) and 1.8 (Timber harvesting regulations) which are all low risk. The (regional) competent authorities for harvesting planning and harvesting permits are the Agency for Nature and Forests (Flanders) and the Department of Nature and Forests (Wallonia). The forest and nature administrations are involved in the approval of management plans, granting of harvesting permits, sales of wood from public forests, and field verification of harvesting operations. Monitoring the impact of logging and extraction of biomass from Belgian forests is carried out in different ways and by different stakeholders. Forest management practices described in the FM Plans and felling licences aim to minimise the impact of forest management operations, including impacts to the remaining stand, neighbouring stands, soils, wetlands and watercourses. National monitoring and research programs carried out by research institutes have documented this impact on a wide range of parameters including soil structure, nutrients, biodiversity, forest health, volume growth, etc. Impact studies are to a limited extent focused on the specific impact of biomass extraction but do cover this aspect of the forest operation as well. Impact considerations are based both on research as well as in-house and external expertise and knowledge which is used in the planning and implementation of forest operations. At private forest level, the situation related to planning and impact monitoring varies significantly among FMUs and depends on the size of the FMU; whether in-house or external forest expertise is used in connection with planning and execution of forest activities; and whether

the FMU is covered by a forest management plan. With regards to public forests in Belgium a FMP is always needed, but with private owners not always. In Flandres a harvesting permit is required when there is no FMP available. And the same governmental department as mentioned above is responsible for the harvesting permits. They will assess the situation against the applicable regulations.

In Wallonia private owners does not need a specific permit, except when these private owners are in Natura 2000 then a Forest management plan is obligatory. Wallonia fully relies on the Forest Code (the regional law) that states that forest exploitation shall be carried out within the limits of the Forest Code. This Code is specific enough to guarantee this indicator is covered. The CNRA indicator 1.4 (harvesting permits) also declares a low risk for the whole country, and thus also for Wallonia.

There are little indications or evidence of harvesting without required permit in Belgium (refer to the ANB Handhavingsrapport for Flanders and the SOE reports for Wallonia, see below).

Inspection & monitoring reports Wallonia.

Wallonia does publish so called 'State Of the Environment' reports (2017 is under the link, start reading at part 7). While checking these reports over the last years it is clear that the number of reports made up by the various inspection services is stable at around 400 reports/year for nature conservation issues and issues with regards to the Forestry Code. The % number of violations recorded in the relation of the Forestry Code increased by a factor of 6 in 2017 (from 1.8% to 11.1%), but it is the result of more systematic prosecutions in the context of reports issued by officers of the Nature and Forests Department. Precise case-by-case details are not published but it is clear that inspection and monitoring is in place.

Belgium has a high ranking of 23 (where 1 is best) (2019) in regards to "rule of Law" under the World banks Worldwide Governance Indicators. This is a score of 1.36 on a scale of -2.5 to +2.5. In relation to control of corruption Belgium ranks 19 (where 1 is best) (score of 1.55) and has a CPI of 75 in 2019 (Above the threshold of 50).

There is thus generally good adherence to relevant legislation protecting forests and the forest environment, and reported illegal activities are dealt with by the authorities. Environmental impact studies are required by law in situations where there is a significant potential impact on forest areas caused by infrastructure or other projects. In such cases, national legislation regarding landscape planning etc. also applies. Some of the wood harvested from such areas affected by these types of projects is likely to be converted to and sold as biomass.

In private forests, logging and biomass extraction is to a large extent carried out by entrepreneurs who also operate in FSC- or PEFC-certified forests, including the State forests, with the same machines and drivers used in the certified FMUs. In such cases the machinery fulfils certification requirements related to low soil impact etc., and the drivers have a high level of understanding of how to avoid negative impact on soils, biodiversity, stands, streams, HCVs etc.

	Wood with non-forest origin. Small scale landscape elements like poplar or willows along roads or canals, or vegetation in small urban parks, or private gardens are used as feedstock by Bimatra. Such small scale landscape elements are not considered to be forest according to the forest definitions, but still felling licences are mostly required. This assessment concludes that current practices with harvesting permits generally ensure appropriate assessment of impacts in connection with production of biomass, and that planning, implementation and monitoring is sufficient to minimize negative impact based on available knowledge. The risk is thus low, except for small private owners in Wallonia and for some non-forest sites, where harvesting permits are not required and can thus not be requested; only in these cases there is a specified risk (see mitigation measures).
Means of Verification	- Forest Management Practices - Supply contracts - Assessment of potential impacts at operational level - Assessment of measures to minimise impacts - Monitoring results - Publicly available information on protecting the identified values - Level of enforcement - Regional, publicly available data from a credible third party - The existence of a strong legal framework in the region
Evidence Reviewed	Natuur & Bos, Flanders law enforcement http://www.natuurenbos.be/beleid-wetgeving/natuurinspectie/handhavingsrapport Rekenhof Belgium, General Belgium compensation after deforest https://www.rekenhof.be/NL/Publicaties/Fiche.html?id=5c3ccdce-e0b6-4746-bd1d-584cf00bd29c Belgium federal government, Various governm. forests in Belgium & links http://www.belgium.be/nl/leefmilieu/biodiversiteit_en_natuur/natuurbeleid/bos/bescherming_en_beheer Natuur & Bos, Flanders species protection law & red list http://www.natuurenbos.be/beleid-wetgeving/natuurbeheer/soortenbescherming/wetgeving

Natuur & Bos, Flanders harvesting permit system

<http://www.natuurenbos.be/beleid-wetgeving/vergunningen/kapmachtiging>

Département de la Nature et des Forêts DNF, Wallonia forest law

<http://environnement.wallonie.be/legis/dnf/forets.htm>

Département de la Nature et des Forêts DNF, Wallonia general introduction site

[http://environnement.wallonie.be/cgi/dgrne/plateforme_dgrne/visiteur/v2/frameset.cfm?page=
http://environnement.wallonie.be/administration/dnf.htm](http://environnement.wallonie.be/cgi/dgrne/plateforme_dgrne/visiteur/v2/frameset.cfm?page=http://environnement.wallonie.be/administration/dnf.htm)

Federal government, Belgium's National Biodiversity Strategy 2006-2016

<http://www.biodiv.be/implementation/docs/stratactplan>

Royal Belgian Institute of Natural Sciences, Biodiversity in Belgium, a country study

<http://www.biodiv.be/implementation/docs/books/bib>

DGARNE, La biodiversité en Wallonie, website

<http://biodiversite.wallonie.be/fr/accueil.html?IDC=6>

Direction générale opérationnelle Wallonie, Plans de secteur (land use plans)

[http://dgo4.spw.wallonie.be/dgatlp/dgatlp/Pages/Observatoire/Pages/DirOHG/Geomatique/W
ebGIS/index.asp](http://dgo4.spw.wallonie.be/dgatlp/dgatlp/Pages/Observatoire/Pages/DirOHG/Geomatique/WebGIS/index.asp)

Direction générale opérationnelle Wallonie, Walloon Code of Land Management, Urban Planning, Heritage and Energy

[http://dgo4.spw.wallonie.be/dgatlp/dgatlp/Pages/DGATLP/PagesDG/CWATUP/GEDactualise/
GED/gedListeArbo.asp](http://dgo4.spw.wallonie.be/dgatlp/dgatlp/Pages/DGATLP/PagesDG/CWATUP/GEDactualise/GED/gedListeArbo.asp)

Belgium federal government, Belgium drinkingwater regulations

http://www.belgium.be/nl/gezondheid/gezond_leven/voeding/voedselveiligheid/water

Brussels capital region, Forest law

	http://www.ejustice.just.fgov.be/cgi_loi/change_lg.pl?language=nl&la=N&cn=2004031839&table_name=wet
Risk Rating	Specified Risk
Comment or Mitigation Measure	The (regional) competent authorities for harvesting planning and harvesting permits are the Agency for Nature and Forests (Flanders) and the Department of Nature and Forests (Wallonia). The forest and nature administrations are involved in the approval of management plans, granting of harvesting permits, sales of wood from public forests, and field verification of harvesting operations in every lot. For private forest in Wallonia and for some non-forest sites in the contractors manual there is a part about risk assessment. With this assessment potential risks while harvesting can be identified as part of the company 'good practises'. These informations about each wood chipping are collected in BIMATRA form 'Feedstock checklist' and actions are taken subsequently consequently.

	Indicator
2.2.2	The BP has implemented appropriate control systems and procedures for verifying that feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b)
Findin g	In principle 'soil quality' should be conserved when following normal regulations in Belgium. This is also confirmed by CNRA indicators 1.3 (Management and harvesting planning), 1.4 (harvesting permits) and 1.8 (Timber harvesting regulations) which are all low risk. The (regional) competent authorities for harvesting planning and harvesting permits are the Agency for Nature and Forests (Flanders) and the Department of Nature and Forests (Wallonia). The forest and nature administrations are involved in the approval of management plans, granting of harvesting permits, sales of wood from public forests, and field verification of harvesting operations. In Wallonia (with hills) about 100.000 hectares of public forests have as primary function the protection of vulnerable soils (e.g. on slopes) and water bodies. These forests are subject to particular protection measures (by the Circulaire n° 2556 du 14 avril 1995 and Circulaire n° 2619 du 22 septembre 1997 'relative aux aménagements dans les bois soumis au régime forestier'). This is translated to FMPs. CNRA indicator 1.10 (Environmental requirements) also state the following: 'General restrictions to harvesting are mentioned in the forest-related legislation (Forest Decree / Forest Code). Environmental restrictions shall be followed in the field, such as requirements related to soil damage, buffer zones, retention trees, seasonal restrictions.' This CNRA indicator has been declared low risk.

	The effects of logging practices and extraction of biomass from forests on the soil and ecosystem nutrient pool in forests have been analysed through research projects over significant periods of time for both nutrient-poor and nutrient-rich soils. The research covers two aspects of soil quality: soil structure and nutrient balance. Leaves/ needles and bark contain most of the nutrients in the trees (N, P, K and Ca). The common practice in Belgium when chipping feedstock for biomass is to leave the branches and top ends in the forest for pre-drying for several months until leaves or needles are shed and left behind in the stand, and before carrying out the chipping. Studies show that this practice significantly minimises plant nutrient loss compared to methods where leaves and needles are removed from the stands. It is concluded that the risk of negative impact on forest nutrient balance in connection with biomass extraction is low, considering the current practices of not extracting leaves/ needles from nutrient-poor soils. Relevant CNRA indicators also declare low risk with respect to this topic. It is concluded that the risk of negative impact on soil structure in connection with biomass extraction is Low.
Means of Verification	· Regional Best Management Practices · Records of BP field inspections · Interviews with staff · Assessment at an operational level of measures designed to minimise impacts on the values identified · The existence of a strong legal framework in the region Level of enforcement * Regional, publicly available data from a credible third party
Evidence Reviewed	Impact of biomass extraction on soil properties and foliar nitrogen content in a community forest and a semi-protected natural forest in the central mid-hills of Nepal https://www.researchgate.net/publication/275520555_Impact_of_biomass_extraction_on_soil_properties_and_foliar_nitrogen_content_in_a_community_forest_and_a_semi-protected_natural_forest_in_the_central_mid-hills_of_Nepal Biomass Fuels & Whole Tree Harvesting Impacts on Soil Productivity—Review of Literature https://www.fs.fed.us/t-d/pubs/pdf/hi_res/09201803hi.pdf Effects of forest biomass harvesting on soil productivity in boreal and temperate forests — A

	review https://www.researchgate.net/publication/237154406_Effects_of_forest_biomass_harvesting_on_soil_productivity_in_boreal_and_temperate_forests_-_A_review Petersen, Leif og Karsten Rasmussen: Jordbundsudvikling under ager og nåleskov. Geografisk Tidsskrift 87: 65-767. København, juni 1987. Retrieved from https://tidsskrift.dk/index.php/geografisktidskrift/article/viewFile/5186/9796 http://denstoredanske.dk/Geografi_og_historie/Geografi/Naturgeografi/Jordbundsgeografi/pod Madsen, Henrik Breuning: Clay Migration and Podzolization in a Danish Soil. Geografisk Tidsskrift 84: 6-19. Copenhagen, January. Retrieved from: https://tidsskrift.dk/index.php/geografisktidskrift/article/view/4477/8383
Risk Rating	Low Risk
Comment or Mitigation Measure	Not Applicable

	Indicator
2.2.3	The BP has implemented appropriate control systems and procedures to ensure that key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).
Finding	In principle 'ecosystems and habitats' should be conserved when following normal regulations in Belgium. This is also confirmed by CNRA indicators 3.3 (Ecosystems and habitats), which is low risk. To assess key ecosystems and habitats in Belgium the CNRA indicator 3.3 takes a look at different angles. The first sub-assessment of CNRA 3.3 assesses the implementation of EU regulations and international agreements into the country specific laws. Such agreements are made to ensure ecosystems and habitats protection. In Belgium the Natura2000 network and the CBD (The Convention on Biological Diversity) are developed for that and converted to laws and regulations (and adaptations to the rules for FMPs, harvesting permits etc etc). All this is well implemented, followed and reported and received a low risk in the CNRA.

In a second sub-assessment the CNRA looks at the daily practise in the field with felling/harvesting licenses (and also about FMPs). This means that it is assessed if the current system in place result in the proper protection of ecosystems and habitats. The conclusions of this can also be found in CNRA indicator 1.4 (harvesting permits). As such this is also low risk in Belgium.

A third sub-assessment takes a look at the law enforcement and if this is up to a satisfactory level. Meaning that the law is actually enforced and ecosystems and habitats are thus protected as intended. This is declared low risk in Belgium.

In the fourth and last assessment the CNRA looks at the habitat level improvements over the last years.

This habitat level assessment was carried out for the country as a whole because Belgium also report on country level to the Convention on Biological Diversity (CBD). In all 3 regions priority habitats are included in the Nature 2000 network. That means that further analyses is based on the status of the Natura 2000 network.

About Habitat improvements in Belgium 58 Priority habitats are recognised under the EU Habitats Directive, of which 9 important ones are related to forestry (Royal Belgian Institute of Natural Sciences, 2014 Fifth National Report of Belgium, to the Convention on Biological Diversity)

Code	Habitat
9110	Luzulo-Fagetum beech forests
9120	Atlantic acidophilous beech forests with Ilex and sometimes also Taxus in the shrublayer (Quercion roburi-petraeae or Ilici-Fagenion)
9130	Asperulo-Fagetum beech forests
9150	Medio-European limestone beech forests of the Cephalanthero-Fagion
9160	Sub-Atlantic & medio-EU oak or oak-hornbeam forests of Carpinion betuli
9180	* Tilio-Acerion forests of slopes, screes and ravines
9190	Old acidophilous oak woods with Quercus robur on sandy plains
91D0	* Bog woodland
91E0	* Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae)

(The sign * indicates priority habitat types for conservation.)

	Belgium data with regards to reporting to the EU about the EU habitats Directive is not easy accessible. But raw data is available from the EU Habitats Directive, Belgium reporting, Article 17 report for the reporting period 2008-2013. In this document each of these habitats is outlined and their current status is presented. The final conclusion of the status in 2013 (last reporting) was: 9110 Luzulo-Fagetum beech forests. Overall assessment of Conservation Status; Bad. Overall trend in Conservation Status: Declining. 9120 Atlantic acidophilous beech forests. Overall assessment of Conservation Status; Bad. Overall trend in Conservation Status: Improving. 9130 Asperulo-Fagetum beech forests. Overall assessment of Conservation Status; Bad. Overall trend in Conservation Status: Declining. 9150 Medio-European limestone beech forests. Overall assessment of Conservation Status; Inadequate. Overall trend in Conservation Status: Unknown. 9160 Sub-Atlantic & medio-EU oak or oak-hornbeam forests. Overall assessment of Conservation Status; Bad. Overall trend in Conservation Status: Unknown. 9180 Tilio-Acerion forests of slopes, screes and ravines. Overall assessment of Conservation Status; Inadequate. Overall trend in Conservation Status: Unknown. 9190 Old acidophilous oak woods. Overall assessment of Conservation Status; Bad. Overall trend in Conservation Status: Stable. 91D0 Bog woodland. Overall assessment of Conservation Status; Bad. Overall trend in Conservation Status: Unknown. 91E0 Alluvial forests with <i>Alnus</i> and <i>Fraxinus</i>. Overall assessment of Conservation Status; Bad. Overall trend in Conservation Status: Improving. Similar to other literature the above picture confirms indeed that Nature needs more time to recover, even with all protection measures in place. Conclusions Belgium properly implemented the regulations that were needed to protect species, biodiversity and habitats, from a legislation point of view. Online map systems are publically available. The law enforcement is effective in Belgium (see full assessment under CNRA HCV 1), but the application is not always checked, thus this is a specified risk.
Means of Verification	Geopunt vlaanderen, Flanders: Biological Hotspots map (BWK) & Natura 2000 map http://www.geopunt.be/

	Geopunt vlaanderen, Flanders: Explanation Geopunt website https://www.natura2000.vlaanderen.be/waar-kun-je-de-bwk-biologische-waarderingskaart-en-habitatkaart-raadplegen Cigale Internet Wallonie Governm., Wallonia: Biological Hotspots map (BWK) & Natura 2000 map http://carto1.wallonie.be/CIGALE/viewer.htm?APPNAME=OGEAD&BOX=-18378.75350707039:11567.058336872025:362622.0084944541:239572.20184715933 GEO Brussels Governm., Brussels: Biological Hotspots map (BWK) & Natura 2000 map http://geonode.geobru.irisnet.be/fr/maps/zones-naturelles-protegees/71/ KCML-Flanders, HVC 6 Cultural heritage map http://www.erfgoedkaart.be/?gclid=CjwKEAjwsr-BRCLvrj785rbhTsSJADjUxak6EoZT7naR-hw8Lg_10GGYk0jvtEaRHZ1gDwNrxmEVRoCTxPw_wcB Natura 2000, EU website with maps and data of all sites http://ec.europa.eu/environment/nature/natura2000/data/index_en.htm
Evidence Reviewed	EU Habitats Directive, Belgium reporting, Article 17 report to the EU (draft data only) http://cdr.eionet.europa.eu/be/eu/art17/envujb4ka/index_html?&page=2 Federal government, Belgium's National Biodiversity Strategy 2006-2016 Http://www.biodiv.be/implementation/docs/stratactplan Royal Belgian Institute of Natural Sciences, Biodiversity in Belgium, a country study http://www.biodiv.be/implementation/docs/books/bib Convention on Biological Diversity (CBD), Country profile. https://www.cbd.int/countries/?country=ie

Risk Rating	Specified Risk
Comment or Mitigation Measure	The law enforcement is effective in Belgium (see full assessment under CNRA HCV 1). Besides, potential risks while harvesting are identified as part of the forest management 'good practises' followed by harvesting teams. Informations about each wood chipping are collected in BIMATRA form 'Feedstock checklist' and actions are taken subsequently consequently

	Indicator
2.2.4	The BP has implemented appropriate control systems and procedures to ensure that biodiversity is protected (CPET S5b).
Finding	Various CNRA indicators were used for this. Implementation of EU Legislation and country specific laws Belgium signed 'The Convention on Biological Diversity' (CBD) in 1995 and the Royal Belgian Institute of Natural Sciences (RBINS) is responsible for its monitoring and reporting in Belgium. The CBD Strategic Plan for Biodiversity 2011-2020 is followed as a guideline for implementation. During the European Summit of Gothenburg in 2001 Belgium committed itself also to "halting biodiversity decline". Related to all this Belgium developed a National Biodiversity Strategy 2006-2016 and an update in 2014 where 15 strategic objectives and 78 operational objectives are specified that aim to reduce and prevent the causes of biodiversity loss in all regions of the country. The Strategy plan takes into account 31 signed (by Belgium) international agreements of which the CBD, Birds Directive, Habitats Directive, NATURA 2000, RAMSAR, Convention on the Conservation of Migratory Species of Wild Animals (CMS) and Cites are the most important for biodiversity. There are no CITES (tree/wood) species occurring in Belgian forests. Based on the National Biodiversity Strategy each region developed its own regional strategic documents and action plans in relation to biodiversity. All information regarding biodiversity is combined on one single website. In the Walloon context EU and national protection designations (see above, Nature 2000) will be used to denote areas with significant concentrations of biodiversity values. The Natura 2000 network in Wallonia is allocated to 220.945 ha (Belgium total is 389.642 ha or 14% of the land cover) (sea is excluded in this total, lit 46). All protected areas in the 3 regions are well mapped and online available for the general public (Walloon

	region. The Natura 2000 network, the corresponding maps and above all the status of implementation are used as the basis for further analyses in this risk assessment. In the Flanders context EU and national protection designations (see above, Nature 2000) will be used to denote areas with significant concentrations of biodiversity values. The Natura 2000 network in Flanders is allocated to 166.322 ha in Flanders (Belgium total is 389.642 ha or 14% of the land cover). All protected areas in the 3 regions are well mapped and online available for the general public. The Natura 2000 network, the corresponding maps and above all the status of implementation are used as the basis for further analyses in this risk assessment. In the Brussels Capital context EU and national protection designations (see above, Nature 2000) will be used to denote areas with significant concentrations of biodiversity values. The Natura 2000 network in Brussels Capital is allocated to 2.375 ha in Brussels-Capital (mostly the well managed and protected “Zoniënwoud (Sonian forest)”). The total for Belgium is 389.642 ha or 14% of the land cover. All protected areas in the 3 regions are well mapped and online available for the general public (Brussels). The Natura 2000 network, the corresponding maps and above all the status of implementation are used as the basis for further analyses in this risk assessment. Risk conclusion: The law enforcement about protected areas is not enough to cover non-protected areas, therefore this indicator is considered as a specified risk and mitigation measures are applied.
Means of Verification	· Forest Management Practices. · Supply contracts. · Assessment of potential impacts at operational level and of measures to minimise impacts monitoring results. · Publicly available information on the protection of the identified values (online maps). · Level of enforcement. · Regional, publicly available data from a credible third party. The existence of a strong legal framework in the region.
Evidence Reviewed	CNRA Belgium https://fsc.org/en/document-centre/documents/resource/397

Royal Belgian Institute of Natural Sciences, 2014, Fifth National Report of Belgium, to the Convention on Biological Diversity

<https://www.cbd.int/doc/world/be/be-nr-05-en.doc>

Federal government, Belgium's National Biodiversity Strategy 2006-2016

<http://www.biodiv.be/implementation/docs/stratactplan>

Geopunt vlaanderen, Flanders: Biological Hotspots map (BWK) & Natura 2000 map

<http://www.geopunt.be/>

Geopunt vlaanderen, Flanders: Explanation Geopunt website

<https://www.natura2000.vlaanderen.be/waar-kun-je-de-bwk-biologische-waarderingskaart-en-habitatkaart-raadplegen>

Cigale Internet Wallonie Governm., Wallonia: Biological Hotspots map (BWK) & Natura 2000 map

<http://carto1.wallonie.be/CIGALE/viewer.htm?APPNAME=OGEAD&BOX=-18378.75350707039:11567.058336872025:362622.0084944541:239572.20184715933>

GEO Brussels Governm., Brussels: Biological Hotspots map (BWK) & Natura 2000 map

<http://geonode.geobru.irisnet.be/fr/maps/zones-naturelles-protegees/71/>

EU Habitats Directive, Belgium reporting, Article 17 report to the EU (draft data only)

http://cdr.eionet.europa.eu/be/eu/art17/envujb4ka/index_html?&page=2

Federal government, Belgium's National Biodiversity Strategy 2006-2016

<Http://www.biodiv.be/implementation/docs/stratactplan>

Royal Belgian Institute of Natural Sciences, Biodiversity in Belgium, a country study

<http://www.biodiv.be/implementation/docs/books/bib>

	Convention on Biological Diversity (CBD), Country profile. https://www.cbd.int/countries/?country=ie
Risk Rating	Specified Risk
Comment or Mitigation Measure	Based on the National Biodiversity Strategy each region developed its own regional strategic documents and action plans in relation to biodiversity and those requirements are taken into account in the felling licences. There are no CITES (tree/wood) species occurring in Belgian forests. Other potential risks while harvesting in non-forest areas are identified as part of the company 'good practises'. These informations about each wood chipping are collected in BIMATRA form 'Feedstock checklist' and actions are taken subsequently consequently.

	Indicator
2.2.5	The BP has implemented appropriate control systems and procedures for verifying that the process of residue removal minimises harm to ecosystems.
Finding	It is common practice to remove big branches and tree tops after felling operations, either for the production of biomass feedstock, or for firewood. The leaves and small branches are left in the forests, then the removal of residues is only partial, occurring to big parts of the trees. Due to technical requirements that the biomass shall fulfil with regards to humidity and density, it is not accepted by Energy Producers that decaying wood is used as input in the chips supplied. Interviews with stakeholders and experience from Forest Management audits confirm that decaying wood is not used as input in chip-production, meaning that decaying wood is also left in the forest. In every forest the forest officers supervise works and check also this matter. In protected areas specific requirements about minimising harm to ecosystems are part of the felling licence and the fulfilment checked by the forest authority usually on a daily basis (every day officers supervise works in the forest). Based on the above, it is concluded that the risk to ecosystems from residue removal related to sourcing of feedstock is low.

Means of Verification	· Forest Management Practices. · Supply contracts. · Assessment of potential impacts at operational level. · Level of enforcement. · Regional, publicly available data from a credible third party. * The existence of a strong legal framework in the regions.
Evidence Reviewed	Supply and destination of food and biomass residues for the circular economy in Flanders https://www.ovam.be/sites/default/files/atoms/files/Supply%20and%20destination%20of%20biomass%20residues%20for%20the%20circular%20economy%20in%20Flanders%20.pdf Département de la Nature et des Forêts DNF, Wallonia forest law http://environnement.wallonie.be/legis/dnf/forets.htm Brussels capital region, Forest law http://www.ejustice.just.fgov.be/cgi_loi/change_lg.pl?language=nl&la=N&cn=2004031839&table_name=wet Federal government, Belgium's National Biodiversity Strategy 2006-2016 http://www.biodiv.be/implementation/docs/stratactplan Natuur & Bos, Bosdecreet 1990, (Flemish forest law) https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1003183&param=inhoud&ref=search&AVIDS=
Risk Rating	Low Risk
Comment or Mitigation Measure	Not Applicable

	Indicator
2.2.6	The BP has implemented appropriate control systems and procedures to verify that negative impacts on ground water, surface water and water downstream from forest management are minimised (CPET S5b).
Finding	This indicator can be answered by CNRA indicator 3.4. (Critical ecosystem services). In Belgium forests are not categorized by the 'functions' such as erosion control, preventing of flooding, barriers from destructive fire and clean water catchments, but regular forest laws cover these topics. If there is felling licence in place and the requirements are fulfilled, the negative impacts on ground water, surface water and water downstream are minimised. The network of waterways, channels, rivers is very dense and articulated in Belgium and the importance to the economy and to the public opinion is very high. This means that controls are very strict and detailed, especially when trees are felled near a water course. Forests acting as protection against erosion and flooding. Erosion, runoff and potential corresponding flooding in valleys is well prevented by the regular forest laws. In all 3 regions harvesting permits (and approved forest management plans) are issued with the provision that the natural condition of the forest will not deteriorate. Each time the DNF, ANB or BIM need to give their approval, they verify the location and importance with regards to protection levels. In public lands the same organisations are actually managing the forests, and they are following the same laws. About 100.000 hectares of public forests in Wallonia have as primary function the protection of vulnerable soils (e.g. on slopes) and water bodies. These forests are subject to particular protection measures (by the Circulaire n° 2556 du 14 avril 1995 and Circulaire n° 2619 du 22 septembre 1997 'relative aux aménagements dans les bois soumis au régime forestier'). There are no signals in national or international publications that forest management is contributing to a problem with flooding or erosion in Belgium. Forests acting as clean drinking water catchments and protection of water quality. Belgium is following European laws on drinking water. These are converted to regional regulations. Conservation measures are already in place in all regions that address all important aspects, and such areas thus appear adequately protected under existing legislation and practice. There are no signals in national or international publications that forest management is contributing to a problem with clean drinking water in Belgium. Every landowner/forest company has to follow the normal Belgian laws and regulations. Minimizing impacts on ground water, surface water and any other waterbody is custom practise because there are special laws and regulations. Therefore, if normal laws and regulations are respected in the forest operations the compliance with this indicator is assured and the risk will be low.

Means of Verification	· Forest Management Practices. · Supply contracts. · Assessment of potential impacts at operational level. · Publicly available information on the protection of the identified values (online maps). · Level of enforcement. · Regional, publicly available data from a credible third party. * The existence of a strong legal framework in the region.
Evidence Reviewed	CNRA Belgium https://fsc.org/en/document-centre/documents/resource/397 Belgium federal government, Belgium drinkingwater regulations http://www.belgium.be/nl/gezondheid/gezond_leven/voeding/voedselveiligheid/water Département de la Nature et des Forêts DNF, Wallonia forest law http://environnement.wallonie.be/legis/dnf/forets.htm Brussels capital region, Forest law http://www.ejustice.just.fgov.be/cgi_loi/change_lg.pl?language=nl&la=N&cn=2004031839&table_name=wet Federal government, Belgium's National Biodiversity Strategy 2006-2016 http://www.biodiv.be/implementation/docs/stratactplan Natuur & Bos, Bosdecreet 1990, (Flemish forest law) https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1003183&param=inhoud&ref=search&AVIDS= Convention on Biological Diversity (CBD), Country profile. https://www.cbd.int/countries/?country=ie

	Intact Forest Landscapes, Country profile. http://www.intactforests.org/data.ifl.html Global Forest Watch, Country profile. http://www.globalforestwatch.org/country WWF, WWF Global 200 Ecoregion/habitat list http://wwf.panda.org/about_our_earth/ecoregions/about/habitat_types/ EU Habitats Directive, About protected habitats and EU countries http://biodiversity.europa.eu/mtr/countries/belgium New action plans towards 2019 : http://europa.eu/rapid/press-release_IP-17-1112_en.htm EU Habitats Directive, Belgium reporting, Article 17 report to the EU (draft data only) http://cdr.eionet.europa.eu/be/eu/art17/envujb4ka/index_html?&page=2
Risk Rating	Low Risk
Comment or Mitigation Measure	Not Applicable

	Indicator
2.2.7	The BP has implemented appropriate control systems and procedures for verifying that air quality is not adversely affected by forest management activities.
Finding	There is no indication of adverse effect on air quality of any significance from forest Management activities in Belgium. All new forest equipment is subject to the Belgium implementation of EU Directive regarding pollution from non-road going machinery, which includes tractors and other forest machinery.

	There is no significant use of burning practices in a Belgian forestry context. This indicator is considered low risk.
Means of Verification	· Forest Management Practices. · Supply contracts. · Assessment of potential impacts at operational level. · Publicly available information on the protection of the identified values (online maps). · Level of enforcement. · Regional, publicly available data from a credible third party. The existence of a strong legal framework in the region.
Evidence Reviewed	EU Directive regarding pollution from non-road going machinery https://ec.europa.eu/growth/sectors/automotive/environment-protection/non-road-mobile-machinery_en
Risk Rating	Low Risk
Comment or Mitigation Measure	Not Applicable

	Indicator
2.2.8	The BP has implemented appropriate control systems and procedures for verifying that there is controlled and appropriate use of chemicals, and that Integrated pest management (IPM) is implemented wherever possible in forest management activities (CPET S5c).
Finding	In Belgium it is not allowed to use pesticides in forestry, following the regulations. Even in poplar plantations chemicals are not used anymore, due to proper clone selection at the beginning. Just as an overview on adjacent land, for the crops close to forests and for non-forest

	sites there is the Belgian action plan to reduce the risks and impacts linked to pesticides 2013-2017 (NAPAN). This plan is based on the Federal laws and subsequent 3 regional laws and explains all the laws applicable. NAPAN introduces Integrated pestmanagement (IPM). In Belgium IPM is stated as a method to protect crops against the harmful effects of diseases and pests, and is aimed at a minimal use of chemical plant protection products. In order to achieve this, any possible pest control methods are used, such as biological, physical and mechanical pest control methods. These are preferred to chemical methods. Interventions are only allowed when the economic damage threshold is exceeded. In order to realise a minimal treatment, preventive measures are taken, such as crop rotation, variety choice and fertilisation. Observations and scientifically sound warnings indicate whether control methods are needed. If necessary, proper action is taken, with priority given wherever possible to non-chemical methods. IPM must guarantee a sustainable and responsible use of plant protection products. NAPAN then list all laws and requirement in place. In keeping with Directive 2009/128/EC, Member States must make sure that the principles of IPM are applied by all professional users. To that end sector-specific IPM guidelines are being drawn up that are in conformity with Annex III of the Directive. All chemical application shall follow the general legislation related to the plant protection products. Requirements – regarding licensing of the personnel in charge of and carrying out the application of chemicals, storage and use of only authorised chemical, use of Personal Protective Equipment and filling and washing of spraying equipment – are well-enforced by responsible authorities. Integrated Pest Management (IPM) practices are implemented. This includes the requirement that chemicals are used only to control significant pressure from insects or weeds, based on monitoring and assessment, and that application is carried out in a responsible manner. The use of any kind of pesticide must be recorded by the forest owner in a spraying journal. The time-limited and use-specific approval of agrochemicals is controlled by the relevant authorities. As Bimatra is also FSC certified they also have to follow the the FSC Pesticides Policy (1-5-2019).
Means of Verification	· Existing legislation · Level of enforcement · Assessment, at an operational level * Interviews with staff
Evidence	Belgian action plan to reduce the risks and impacts linked to pesticides.

Reviewed	https://fytoweb.be/sites/default/files/content/reduction/napan_2013-2017.pdf Guides - Crop Protection https://fytoweb.be/en/guide/crop-protection Sustainable use of pesticides https://ec.europa.eu/food/plant/pesticides/sustainable_use_pesticides_en Pesticides et biocides https://www.belgium.be/fr/environnement/substances_chimiques/pesticides_et_biocides
Risk Rating	Low Risk
Comment or Mitigation Measure	Not Applicable

	Indicator
2.2.9	The BP has implemented appropriate control systems and procedures for verifying that methods of waste disposal minimise negative impacts on forest ecosystems (CPET S5d).
Finding	Regional Best Management Practices include rules about waste disposal. No significant impacts from forest management activities due to uncorrect waste disposal was detected in any source. ‘Bimatra Instructions for forest operators’ include rules about waste disposal in the forests. Littering in Belgium rarely occurs along roads, parking spaces, recreational facilities, also forests borders, but it is illegal and subject to police control. The forest operators notify to police and measures are taken to restore the situation, according to environmental laws and consequent practises. If a forest company is following the normal law and regulations they will comply with this indicator and the risk will be low.

Means of Verification	· Existing legislation · Level of enforcement * Regional Best Management Practices
Evidence Reviewed	Natuur & Bos, Flanders law enforcement http://www.natuurenbos.be/beleid-wetgeving/natuurinspectie/handhavingsrapport Cooperation agreement on international environmental policy between the Federal State, the Flemish Region, the Walloon Region and the Brussels-Capital Region. The Environmental implementation review – Belgium http://ec.europa.eu/environment/eir/pdf/factsheet_be_en.pdf Environmental law and practice in Belgium: overview https://content.next.westlaw.com/2-503-5135?transitionType=Default&contextData=(sc.Default)&__lrTS=20190414052836901&firstPage=true&bhcp=1
Risk Rating	Low Risk
Comment or Mitigation Measure	Not Applicable

	Indicator
2.3.1	Analysis shows that feedstock harvesting does not exceed the long-term production capacity of the forest, avoids significant negative impacts on forest productivity and ensures long-term economic viability. Harvest levels are justified by inventory and growth data.
Finding	The 3 Regional Forest Acts gives basic protection from overexploitation of the forests. They also state that in forest management plans there must be calculations about this. The set harvest levels are justified by means of inventory and growth data, in order not to threaten forest productivity or long-term economic viability.

	According to the Global Forest Resources Assessment 2015 for Belgium prepared by FAO, the forest area in Belgium increased by 2,200 ha between the years 2010 and 2015 (from 681,200 ha to 683,400 ha). This change is related only to Wallonia, as forest areas in Flanders and Brussels remained unchanged. In the same report, the latest available data about deforestation is from the year 2010. In 2010, 1,470 ha were deforested while 2,227 ha were reforested. Additionally, the forest expansion was 1,697 ha (1,242 ha afforestation and 455 ha natural forest expansion). The same source also shows an increase in growing stock, meaning that forests were not over-harvested. Based on the above information, the risk for this Indicator can be considered as low.
Means of Verification	* Harvesting records, inventory and growth data and yield calculations demonstrate * Documentation of Operational Practice
Evidence Reviewed	Département de la Nature et des Forêts DNF, Wallonia forest law http://environnement.wallonie.be/legis/dnf/forets.htm Brussels capital region, Forest law http://www.ejustice.just.fgov.be/cgi_loi/change_lg.pl?language=nl&la=N&cn=2004031839&table_name=wet Natuur & Bos, Bosdecreet 1990, (Flemish forest law) https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1003183&param=inhoud&ref=search&AVIDS= FAO (2014) Global Forest Resources Assessment 2015 – Country Report, Belgium. Rome. Available at: http://www.fao.org/3/a-az164f.pdf Bos+Bosbarometer 2015, Flanders, background Belgium and stats http://www.bosplus.be/nl/publicaties/beleidsdossiers Inbo, Flanders: areas in ha https://www.inbo.be/nl/natuurindicator/oppervlakte-bos-volgens-boswijzer Inbo, Flanders: areas in ha, download Boswijzer

	http://www.geopunt.be/catalogus/datasetfolder/F9DDA633-1F45-483B-8227-91A466646329 Royal Belgian Institute of Natural Sciences, 2014, Fifth National Report of Belgium, to the Convention on Biological Diversity https://www.cbd.int/doc/world/be/be-nr-05-en.doc L'état de l'environnement wallon, Wallonia; Environmental outlook Wallonia 2014 http://etat.environnement.wallonie.be/index.php?page=eow-2014 Brussels capital region, Staat van het leefmilieu http://www.leefmilieu.brussels/staat-van-het-leefmilieu SRFB, The Forest of Belgium http://www.srfb.be/nl/de_belgische_bossen
Risk Rating	Low Risk
Comment or Mitigation Measure	Not Applicable

	Indicator
2.3.2	Adequate training is provided for all personnel, including employees and contractors (CPET S6d).
Finding	Forest managers and workers in Belgium have a high level of education. Basic training for a skilled forest worker lasts several years, and includes both practical placement and classroom education. The curriculum includes forest mechanization, ergonomics, health and safety, forestry techniques, biology and economics. Shorter and more specific courses are also available, and even unskilled forest workers and contractors typically attend one or more trainings every year. Bimatra itself is also providing training and attending training. Training records are kept.

	Based on the above information, the risk for this Indicator has been assessed as low.
Means of Verification	· Training records · Interviews with staff * Training plans and records of qualifications
Evidence Reviewed	Forestry education in Belgium: http://www.ktahorteco.be/bosbouw-en-bosbeheer https://www.inverde.be/ https://studiekiezer.ugent.be/master-of-science-in-de-bio-ingenieurswetenschappen-bos-en-natuurbeheer https://www.uantwerpen.be/en/about-uantwerp/faculties/faculty-of-science/departments/bioscience-engineering/education/bachelor/land-and-forest-manage/ https://www.bosplus.be/nl/educatieve-projecten/green-learning-environments-eng https://www.natuurenbos.be/over-het-anb/inverde/natuuropleidingen
Risk Rating	Low Risk
Comment or Mitigation Measure	Not Applicable

	Indicator
2.3.3	Analysis shows that feedstock harvesting and biomass production positively contribute to the local economy, including employment.
Finding	Biomass with origin in Belgium is mainly supplied through domestic supply chains to energy plants. Studies made by Naturstyrelsen (Denmark) show that production of biomass in connection with thinning and harvesting in the state forests has increased the commercial volumes over a rotation period by up to 10% compared to volume models that do not take the biomass into consideration. The increased commercial use of residues in connection with harvesting and thinning contribute to the financial outcome and create an incentive for forest owners and entrepreneurs to manage forest stand. Interview with various stakeholders confirm that logging and processing of biomass (wood chips) is carried out almost entirely by local entrepreneurs. The chip production takes place

	in the forest stands or at processing sites near the forests. The biomass is transported regionally over relatively short distances, using local transporters. International studies (see below) show the same. Based on the reviewed evidence, it is concluded that there is a low risk.
Means of Verification	Naturstyrelsen study * Interviews with employees of a local transport company.
Evidence Reviewed	Naturstyrelsen study https://naturstyrelsen.dk/publikationer/ Renewable Energy Employment http://www.eubia.org/cms/wiki-biomass/employment-potential-in-figures/ Renewable Energy and Jobs Annual Review 2018 https://irena.org/media/Files/IRENA/Agency/Publication/2018/May/IRENA_RE_Jobs_Annual_Review_2018.pdf
Risk Rating	Low Risk
Comment or Mitigation Measure	Not Applicable

	Indicator
2.4.1	The BP has implemented appropriate control systems and procedures for verifying that the health, vitality and other services provided by forest ecosystems are maintained or improved (CPET S7a).
Finding	The biomass that Bimatra produces from forests comes from regulated cuts (even in

	roadside or channel woodlands), in which there is a mandatory amount of trees to be left (identified one by one by public authority in most cases). Clear cuts are not allowed. This prevents total extraction of biomass from a poor soil, if any. In ordinary cases of average soils, this maintains all services provided by forests, such as soil fertility, water regulation, re-growth of trees or renewal by seeds. The 3 Belgian Forest Act (one for each region) state that the intention of the Forest Act is to maintain and protect the forests and increase the forest area. An additional intention is to promote the sustainable management of the forests in the country, including an explicitly stated objective of maintaining and increasing the biological diversity of the forests. They also state that in forest management plans there should be further calculations. The set harvest levels are justified by means of inventory and growth data, and do not threaten forest productivity or long-term economic viability. According to the Global Forest Resources Assessment 2015 for Belgium prepared by FAO, the forest area in Belgium increased by 2,200 ha between the years 2010 and 2015 (from 681,200 ha to 683,400 ha). This change is related only to Wallonia, as forest areas in Flanders and Brussels remained unchanged. In the same report, the latest available data about deforestation is from the year 2010. In 2010, 1,470 ha were deforested while 2,227 ha were reforested. Additionally, the forest expansion was 1,697 ha (1,242 ha afforestation and 455 ha natural forest expansion). The same source also shows an increase in growing stock. There are more international sources (like Natura2000 and CBD report) that show the 'health' of the forest environment. In these reports biomass production is not correlated to the main threats. If a forest company follows the normal law and regulations they comply with this indicator and the risk is low.
Means of Verification	Review of scientific reports and data.
Evidence Reviewed	CNRA Belgium https://fsc.org/en/document-centre/documents/resource/397 Département de la Nature et des Forêts DNF, Wallonia forest law http://environnement.wallonie.be/legis/dnf/forets.htmssels capital region, Forest law

	http://www.ejustice.just.fgov.be/cgi_loi/change_lg.pl?language=nl&la=N&cn=2004031839&table_name=wet Natuur & Bos, Bosdecreet 1990, (Flemish forest law) https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1003183&param=inhoud&ref=search&AVIDS= EU Habitats Directive, Belgium reporting, Article 17 report to the EU (draft data only) http://cdr.eionet.europa.eu/be/eu/art17/envujb4ka/index_html?&page=2 Royal Belgian Institute of Natural Sciences, 2014, Fifth National Report of Belgium, to the Convention on Biological Diversity https://www.cbd.int/doc/world/be/be-nr-05-en.doc FAO (2014) Global Forest Resources Assessment 2015 – Country Report, Belgium. Rome. Available at: http://www.fao.org/3/a-az164f.pdf
Risk Rating	Low Risk
Comment or Mitigation Measure	Not Applicable

	Indicator
2.4.2	The BP has implemented appropriate control systems and procedures for verifying that natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b).
Finding	The 3 regional Forest Acts requires that forest owners maintain forest cover on forest land, as well as establishing that they should maintain 'healthy forests' with high level of resistance and resilience towards known calamities such as pests, wind and climate change. Fires, pests and diseases occur at a small scale in Belgium forests and are managed by the forest owner. The main natural process that has a negative impact on forest stands are storms that may cause wind throw. It is the responsibility of the forest owners and/or managers to apply silvicultural methods that improve the stability of forest stands. Replanting after wind throw in private forests is subsidised through an insurance system which covers most forest owners.

	State forests are managed according to 'close to nature' forest management principles with the intent to promote species composition and forest structure with high level of resistance and resilience. The management of other types of pests, fires and diseases is carried out by each forest owner, and is generally based on knowledge and guidance provided by internal forest staff, forestry consultants, forestry magazines and other channels of information. There is a country wide system of fire services, thus this is under control in Belgium. Forest fires are hardly happening anyway. Forest owners and forest workers are well educated and will be able to address such things in an adequate way. In poplar plantations the institute INBO has carried on and is carrying on several research about poplar clones selection aimed to avoid the occurrence of diseases in poplar stands, as an effective preventive action. Bimatra is informed through its network about natural processes that may occur in the forests and the way to manage them. See also 2.2.8 for Integrated Pest Management (IPM), which is low risk.
Means of Verification	· Review of documentation · Interviews with forest workers and staff · General knowledge about forest practices collected from general engagement with the forest sector.
Evidence Reviewed	CNRA Belgium https://fsc.org/en/document-centre/documents/resource/397 Bedreigen nieuwe ziekten en aantastingen boom en bos? https://bosrevue.bosplus.be/l/library/download/urn:uuid:f9498eae-ba9f-4412-aeb8-12ec1481ec93/bosrevue14_bedreigen+nieuwe+ziekten+en+aantastingen+boom+en+bos_sioende+haeck+roskams.pdf?format&ext=.pdf Boomziekten en de klimaatopwarming http://www.vmx.be/boomziekten-en-de-klimaatopwarming

	Département de la Nature et des Forêts DNF, Wallonia forest law http://environnement.wallonie.be/legis/dnf/forets.htm Brussels capital region, Forest law http://www.ejustice.just.fgov.be/cgi_loi/change_lg.pl?language=nl&la=N&cn=2004031839&table_name=wet Natuur & Bos, Bosdecreet 1990, (Flemish forest law) https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1003183&m=inhoud&ref=search&AVIDS= INBO Institute https://www.vlaanderen.be/inbo/home/
Risk Rating	Low Risk
Comment or Mitigation Measure	Not Applicable

	Indicator
2.4.3	The BP has implemented appropriate control systems and procedures for verifying that there is adequate protection of the forest from unauthorised activities, such as illegal logging, mining and encroachment (CPET S7c).
Finding	The CNRA category 1 is about Illegally harvested wood. There are 21 indicators and they are all low risk, meaning that on a country level illegally harvested wood is not an issue. All 3 regions have adopted a Forestry Law, of which evidence of proper enforcement is requested, organized and existing. According to the participants of the FSC Belgium working groups on Controlled Wood

	(both Dutch and French speaking), harvesting of wood is subject to a robust authorization procedure and the level of law enforcement (including field inspections) is adequate. Furthermore, there are little indications or evidence of harvesting without required permit in Belgium (refer to the ANB Handhavingsrapport for Flanders and the TBE reports for Wallonia). In the annual reports nothing special can be found. Cases are few and small. Mining and encroachment do not happen in Belgium as all borders and clearly known (in the online cadastre system) and forest guards are present at felling operations. Nature conservation societies and civilians have a pro-active approach and infringements can be reported to the forest and nature administration, which carries out inspections in the field. It is very unlikely that deforestation goes unnoticed in this densely populated country. The level of law enforcement is strong, with a reasonable capacity of forest guards and inspectors. Complaints by parties involved or notifications by parties not involved to the Agency for Nature and Forests (ANB) are increasing yearly. This does not correspond with a higher level of (illegal) deforestation, but rather with increased 'social control' in case of (alleged) infringements. Notifications rarely lead to effective actions. The corruption level in Belgium is considered low, refer to the Transparency International corruption perception index of 75 (higher than the threshold of 50), so there is not much risk for issuance of illegal harvesting permits. Belgium has a high ranking of 89.9% (2013) in regards to "rule of Law" under the World banks Worldwide Governance Indicators. This is a score of 1.40 on a scale of -2.5 to +2.5. In relation to control of corruption Belgium ranks 91.9% (score of 1.63). If a forest company follows the normal law and regulations they comply with this indicator and the risk is low.
Means of Verification	Annual reports about inspections (handhavingsreport)
Evidence Reviewed	CNRA Belgium https://fsc.org/en/document-centre/documents/resource/397 Handhavings rapporten (Security monitoring and offenses, annual summary report). 2015. https://www.natuurenbos.be/publicaties/publicaties/handhavingsrapporten

	Rapport d'activité de police (Security monitoring and offenses in the environment, annual summary report). Various years. http://environnement.wallonie.be/ Chattam House Illegal Logging Indicators Country Report Card www.illegal-logging.org Environmental Investigation Agency www.eia-international.org Global Witness www.globalwitness.org Transparency International Corruption Perception Index http://www.transparency.org/cpi2018/results World World Banks Worldwide Governance Indicator http://info.worldbank.org/governance/wgi/index.aspx#reports
Risk Rating	Low Risk
Comment or Mitigation Measure	Not Applicable

	Indicator
2.5.1	The BP has implemented appropriate control systems and procedures for verifying that legal, customary and traditional tenure and use rights of indigenous people and local communities related to the forest, are identified, documented and respected (CPET S9).
Finding	For this, various CNRA indicators can be used.

	Indicator 1.15 : Indigenous peoples rights; is declared N/A. There are no indigenous people in Belgium, according to UN definition (refer also to ILO convention 169). Indicator 1.13: Customary rights. Customary rights (erfdienstbaarheden) come into existence when a specific land use is condoned for more than 30 years. When identified these rights will be recorded on the ownership documents when the property is sold. Other customary rights may exist without having been recorded, but these generally have a limited scope (for example the right to cross the land to reach adjacent lands). If contested, customary rights can be argued and determined in a court of law. In the Walloon Region, some user rights still exist in some municipalities and are preserved even while the Forest Code did not foresee new user rights (article 48). In private forest, notarial deeds may include certain rights that are thus protected. Forest management plans are subject to stakeholder consultation prior to approval by the forest and nature administration. This should ensure that customary rights are observed during harvesting activities. Indicator 2.3: The rights of Indigenous and Traditional Peoples are upheld. There are no indigenous peoples and no traditional peoples in Belgium. This is then considered low risk in Belgium. Nevertheless Bimatra Contractors Manual explains that 'When you are about to remove vegetation but this is actually very important for a local community, farmers etc then you should think twice. Certainly when there is no official regulation in place. This can be the case when such vegetation is used as a supply of firewood, mushrooms, berries and fruits, recreational site etc etc.'
Means of Verification	Belgium: - Documents of ownership (notarial document/deed with survey plan as measured by the land surveyor)
Evidence Reviewed	CNRA Belgium https://fsc.org/en/document-centre/documents/resource/397 Civil Law ('Burgerlijk Wetboek' / 'Code Civil' 21.03.1804), Book II, Title IV, art. 516-710 (goods and limits of property), specifically articles 637 and the following on customary rights ('Erfdienstbaarheden' / 'Servitudes'); http://www.landmeters-experten.be/docs/doc%20erfdienstbaarheid.pdf

Risk Rating	Low Risk
Comment or Mitigation Measure	Not Applicable

	Indicator
2.5.2	The BP has implemented appropriate control systems and procedures for verifying that production of feedstock does not endanger food, water supply or subsistence means of communities, where the use of this specific feedstock or water is essential for the fulfillment of basic needs.
Finding	See also indicator 2.2.6, 2.5.1 (both low risk) and CNRA indicator 3.4. & 3.5 (Critical ecosystem services and community needs). Community needs This indicator does not occur in the Belgian context. No forest areas were identified as fundamental to meeting the basic needs of local communities. There are no cases in literature, press or international reports. There are also no special laws or regulations that regulate such things. Forests acting as clean drinking water catchments and protection of water quality. Belgium is following European laws on drinking water. These are converted to regional regulations. Conservation measures are already in place in all regions that address all important aspects, and such areas thus appear adequately protected under existing legislation and practice. There are no signals in any publications that forest management is contributing to a problem with clean drinking water in Belgium. Every forest landowner/forest company has to follow the Belgian laws and regulations, which include rules about minimizing impacts on ground water, surface water and any other waterbody. It is custom practise to follow these rules that are detailed in the Forest Management Practises and stated in the felling licence. Therefore, if forest companies follow the normal law and regulations, verified by forest inspectors, they comply with this indicator and the risk is low.
Means of Verification	· Forest Management Practices. · Supply contracts. · Assessment of potential impacts at operational level · Publicly available information on the protection of the identified values (online maps).

	· Level of enforcement. · Regional, publicly available data from a credible third party. * The existence of a strong legal framework in the region.
Evidence Reviewed	CNRA Belgium https://fsc.org/en/document-centre/documents/resource/397 Belgium federal government, Belgium drinkingwater regulations http://www.belgium.be/nl/gezondheid/gezond_leven/voeding/voedselveiligheid/water Département de la Nature et des Forêts DNF, Wallonia forest law http://environnement.wallonie.be/legis/dnf/forets.htm Brussels capital region, Forest law http://www.ejustice.just.fgov.be/cgi_loi/change_lg.pl?language=nl&la=N&cn=2004031839&table_name=wet Federal government, Belgium's National Biodiversity Strategy 2006-2016 http://www.biodiv.be/implementation/docs/stratactplan Natuur & Bos, Bosdecreet 1990, (Flemish forest law) https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1003183&param=inhoud&ref=search&AVIDS
Risk Rating	Low Risk
Comment or Mitigation Measure	Not Applicable

	Indicator
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2.6.1	The BP has implemented appropriate control systems and procedures for verifying that appropriate mechanisms are in place for resolving grievances and disputes, including those relating to tenure and use rights, to forest management practices and to work conditions.
Finding	Grievances and disputes, including those relating to tenure and usage rights, forest management practices and work conditions, are regulated by legislation in Belgium. The detailed procedures, duties and responsibilities of involved persons are defined in the legislation. The legislation and justice system provide a route for appeal, should people be dissatisfied with the outcome of the dispute resolution process. The disputes related to work conditions shall be resolved according to administrative procedures and labour legislation. Prevailing practice is to include additional dispute resolution related statements of clarification in the working agreements. In addition, the trade unions can assist in resolving disputes over working conditions and can use their own procedures and agreements. If a forest company follows the normal law and regulations they comply with this indicator and the risk is low. Besides Bimatra is FSC & PEFC certified and such is thus also partly addressed by the certification system.
Means of Verification	· Existing legislation · Level of enforcement · Regional Best Management Practices * Supply contracts
Evidence Reviewed	FSC & PEFC documentation Bimatra. Regional legislation.
Risk Rating	Low Risk
Comment or Mitigation Measure	Not Applicable

	Indicator
2.7.1	The BP has implemented appropriate control systems and procedures for verifying that Freedom of Association and the effective recognition of the right to collective bargaining are respected.
Finding	Such is covered under CNRA indicator 2.2. The main conclusion of this indicator is: "Rights like freedom of association and collective bargaining are upheld." Belgium has ratified all the 8 Fundamental ILO Conventions. The status on the ILO website for all 8 Conventions is 'in force'. Such laws are also converted to national and regional laws. C29 Forced Labour Convention, 1930 C87 Freedom of Association and Protection of the Right to Organise Convention, 1948 C98 Right to Organise and Collective Bargaining Convention, 1949 C100 Equal Remuneration Convention, 1951 C105 Abolition of Forced Labour Convention, 1957 C111 Discrimination (Employment and Occupation) Convention, 1958 C138 Minimum Age Convention, 1973 C182 Worst Forms of Child Labour Convention, 1999 The national FSC working group declared: "that Belgian legislation and controls provide adequate control mechanisms to prevent violation of fundamental principles and rights of workers (in the forest and beyond). There are no indications of violation of ILO fundamental Principles and Rights at work. The working groups recognise that Belgium is a 'state of law' where mechanisms exist to recognise and protect these rights and for conflict resolution in general. The working group is also strongly convinced that these mechanisms prove to be sufficiently efficient. Also in forest laws (per region) such rights/interests/identities, mostly on access and forest use, are clearly described and respected." ITUC Irregular Violation of Rights. Belgium is classified in the category 1 – . Score: 0-8 "Collective labour rights are generally guaranteed. Workers can freely associate and defend their rights collectively with the government and/or companies and can improve their working conditions through collective bargaining. Violations against workers are not absent but do not occur on a regular basis." (p. 15). http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf

	If a forest company follows the normal law and regulations they comply with this indicator and the risk is low.
Means of Verification	· ILO conventions and documents. Existing legislation and level of enforcement
Evidence Reviewed	CNRA Belgium https://fsc.org/en/document-centre/documents/resource/397 Status of ratification of fundamental ILO conventions: http://www.ilo.org/dyn/normlex/en/f?p=1000:11001:0::NO:: or use: ILO Core Conventions Database: http://www.ilo.org/ilolex/english/docs/declworld.htm ILO Declaration on Fundamental Principles and Rights at Work. Country reports. http://www.ilo.org/declaration/lang--en/index.htm Source of several reports. Search for 'racial discrimination', 'child labour', 'forced labour', 'gender equality', 'freedom of association' Country report http://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102560 ILO assessment http://www.ilo.org/wcmsp5/groups/public/---ed_mas/---eval/documents/publication/wcms_315637.pdf Human Rights Watch: http://www.hrw.org/ The ITUC Global Rights Index ranks 139 countries against 97 internationally recognised indicators to assess where workers' rights are best protected, in law and in practice. The Survey provides information on violations of the rights to freedom of association, collective bargaining and strike as defined by ILO Conventions, in particular ILO Convention Nos. 87

	and 98 as well as jurisprudence developed by the ILO supervisory mechanisms. http://www.ituc-csi.org/new-ituc-global-rights-index-the?lang=en
Risk Rating	Low Risk
Comment or Mitigation Measure	Not Applicable

	Indicator
2.7.2	The BP has implemented appropriate control systems and procedures for verifying that feedstock is not supplied using any form of compulsory labour.
Finding	Such is covered under CNRA indicator 2.2. The main conclusion of this indicator is: “ There is evidence confirming absence of compulsory and/or forced labour.” Belgium has ratified all the 8 Fundamental ILO Conventions. The status on the ILO website for all 8 Conventions is ‘in force’. Such laws are also converted to national and regional laws. C29 Forced Labour Convention, 1930 C87 Freedom of Association and Protection of the Right to Organise Convention, 1948 C98 Right to Organise and Collective Bargaining Convention, 1949 C100 Equal Remuneration Convention, 1951 C105 Abolition of Forced Labour Convention, 1957 C111 Discrimination (Employment and Occupation) Convention, 1958 C138 Minimum Age Convention, 1973 C182 Worst Forms of Child Labour Convention, 1999 The national FSC working group declared: ‘that Belgian legislation and controls provide adequate control mechanisms to prevent violation of fundamental principles and rights of workers (in the forest and beyond). There are no indications of violation of ILO fundamental Principles and Rights at work. The working groups recognise that Belgium is a ‘state of law’

	where mechanisms exist to recognise and protect these rights and for conflict resolution in general. The working group is also strongly convinced that these mechanisms prove to be sufficiently efficient. Also in forest laws (per region) such rights/interests/identities, mostly on access and forest use are clearly described and respected.” If a forest company follows the normal law and regulations they comply with this indicator and the risk is low.
Means of Verification	· ILO conventions and documents. Existing legislation and level of enforcement
Evidence Reviewed	CNRA Belgium https://fsc.org/en/document-centre/documents/resource/397 Status of ratification of fundamental ILO conventions: http://www.ilo.org/dyn/normlex/en/f?p=1000:11001:0::NO:: or use: ILO Core Conventions Database: http://www.ilo.org/ilolex/english/docs/declworld.htm ILO Declaration on Fundamental Principles and Rights at Work. Country reports. http://www.ilo.org/declaration/lang--en/index.htm Source of several reports. Search for 'racial discrimination', 'child labour', 'forced labour', 'gender equality', 'freedom of association' Country report http://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102560 ILO assessment http://www.ilo.org/wcmsp5/groups/public/---ed_mas/---eval/documents/publication/wcms_315637.pdf Human Rights Watch: http://www.hrw.org/ The ITUC Global Rights Index ranks 139 countries against 97 internationally recognised indicators to assess where workers' rights are best protected, in law and in practice. The Survey provides information on violations of the rights to freedom of association, collective bargaining and strike as defined by ILO Conventions, in particular ILO Convention Nos. 87

	and 98 as well as jurisprudence developed by the ILO supervisory mechanisms. http://www.ituc-csi.org/new-ituc-global-rights-index-the?lang=en
Risk Rating	Low Risk
Comment or Mitigation Measure	Not Applicable

	Indicator
2.7.3	The BP has implemented appropriate control systems and procedures to verify that feedstock is not supplied using child labour.
Finding	Such is covered under CNRA indicator 2.2. The main conclusion of this indicator is: “ There is evidence confirming absence of child labour..” Belgium has ratified all the 8 Fundamental ILO Conventions. The status on the ILO website for all 8 Conventions is ‘in force’. Such laws are also converted to national and regional laws. C29 Forced Labour Convention, 1930 C87 Freedom of Association and Protection of the Right to Organise Convention, 1948 C98 Right to Organise and Collective Bargaining Convention, 1949 C100 Equal Remuneration Convention, 1951 C105 Abolition of Forced Labour Convention, 1957 C111 Discrimination (Employment and Occupation) Convention, 1958 C138 Minimum Age Convention, 1973 C182 Worst Forms of Child Labour Convention, 1999 The national FSC working group declared: ‘that Belgian legislation and controls provide adequate control mechanisms to prevent violation of fundamental principles and rights of workers (in the forest and beyond). There are no indications of violation of ILO fundamental Principles and Rights at work. The working groups recognise that Belgium is a ‘state of law’

	where mechanisms exist to recognise and protect these rights and for conflict resolution in general. The working group is also strongly convinced that these mechanisms prove to be sufficiently efficient. Also in forest laws (per region) such rights/interests/identities, mostly on access and forest use are clearly described and respected.” If a forest company follows the normal law and regulations they comply with this indicator and the risk is low.
Means of Verification	· ILO conventions and documents. Existing legislation and level of enforcement
Evidence Reviewed	CNRA Belgium https://fsc.org/en/document-centre/documents/resource/397 Status of ratification of fundamental ILO conventions: http://www.ilo.org/dyn/normlex/en/f?p=1000:11001:0::NO:: or use: ILO Core Conventions Database: http://www.ilo.org/ilolex/english/docs/declworld.htm ILO Declaration on Fundamental Principles and Rights at Work. Country reports. http://www.ilo.org/declaration/lang--en/index.htm Source of several reports. Search for 'racial discrimination', 'child labour', 'forced labour', 'gender equality', 'freedom of association' Country report http://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102560 ILO assessment http://www.ilo.org/wcmsp5/groups/public/---ed_mas/---eval/documents/publication/wcms_315637.pdf Human Rights Watch: http://www.hrw.org/ The ITUC Global Rights Index ranks 139 countries against 97 internationally recognised indicators to assess where workers' rights are best protected, in law and in practice. The

	Survey provides information on violations of the rights to freedom of association, collective bargaining and strike as defined by ILO Conventions, in particular ILO Convention Nos. 87 and 98 as well as jurisprudence developed by the ILO supervisory mechanisms. http://www.ituc-csi.org/new-ituc-global-rights-index-the?lang=en Child Labour Index 2014 produced by Maplecroft. http://maplecroft.com/portfolio/new-analysis/2013/10/15/child-labour-risks-increase-china-and-russia-most-progress-shown-south-america-maplecroft-index/ Belgium scores 'low risk' on the Child Labour Index 2014. Global March Against Child Labour: http://www.globalmarch.org/ No references to Belgium regarding child labour or child trafficking. ILO Child Labour Country Dashboard: http://www.ilo.org/ipecc/Regionsandcountries/lang--en/index.htm Belgium does not feature in the ILO Child Labour Country Dashboard. Office of the United Nations High Commissioner for Human Rights (OHCHR), Committee on Rights of the Child: http://www.ohchr.org/EN/HRBodies/CRC/Pages/CRCIndex.aspx No mentioning in this report of child labour in Belgium
Risk Rating	Low Risk
Comment or Mitigation Measure	Not Applicable

	Indicator
2.7.4	The BP has implemented appropriate control systems and procedures for verifying that feedstock is not supplied using labour which is discriminated against in respect of

	employment and occupation.
Finding	Such is covered under CNRA indicator 2.2. The main conclusion of this indicator is: “ There is evidence confirming absence of discrimination in respect of employment and/or occupation, and/or gender. Although there is a gender pay gap it is concluded that this is limited from the international perspective. There are instances of reported discrimination in the working place but these are not widespread and no specific instances found in forestry sector.” And “there is evidence that all groups (including women) feel adequately protected related to the labour rights”. Belgium has ratified all the 8 Fundamental ILO Conventions. The status on the ILO website for all 8 Conventions is ‘in force’. Such laws are also converted to national and regional laws. C29 Forced Labour Convention, 1930 C87 Freedom of Association and Protection of the Right to Organise Convention, 1948 C98 Right to Organise and Collective Bargaining Convention, 1949 C100 Equal Remuneration Convention, 1951 C105 Abolition of Forced Labour Convention, 1957 C111 Discrimination (Employment and Occupation) Convention, 1958 C138 Minimum Age Convention, 1973 C182 Worst Forms of Child Labour Convention, 1999 The national FSC working group declared: ‘that Belgian legislation and controls provide adequate control mechanisms to prevent violation of fundamental principles and rights of workers (in the forest and beyond). There are no indications of violation of ILO fundamental Principles and Rights at work. The working groups recognise that Belgium is a ‘state of law’ where mechanisms exist to recognise and protect these rights and for conflict resolution in general. The working group is also strongly convinced that these mechanisms prove to be sufficiently efficient. Also in forest laws (per region) such rights/interests/identities, mostly on access and forest use are clearly described and respected.” Discrimination against Women Committee on the Elimination of Discrimination against Women http://www.ohchr.org/en/hrbodies/cedaw/pages/cedawindex.aspx (Right top select country click on CEDAW treaty, click on latest reporting period and select concluding observations). The following is concluded (last report is 2014):

· The Committee welcomes the adoption of the 2012 Law aimed at reducing the gender wage gap and the 2011 Law on women's participation in management boards of listed companies and autonomous public enterprises. However, it remains concerned at:

· The persistent gender wage gap as well as horizontal and vertical segregation in the labour market, where women are concentrated in lower-paid and part-time work, which adversely affects their career development and pension benefits;

· The fact that the evaluation of the implementation of the 2011 Law on women's participation in management boards of listed companies and autonomous public enterprises is due to take place only in 2023 and that no similar temporary special measures are envisaged in other companies to increase the representation of women at decision-making levels;

· The large number of cases of discrimination on grounds of pregnancy and motherhood filed with the Institute for the Equality of Women and Men;

The low number of cases of sexual harassment that are considered to be well-founded by the labour courts (14.3 percent) and the increasing number of complaints concerning sexual

harassment received by the Institute for the Equality of Women and Men between 2009 and 2011; and

· The absence of a study on gender-based discrimination in the social security system.” (p. 7)

The OECD concluded the following:

“The female labour force participation rate has increased significantly over the past two decades (from 46% in 1990 to 62% in 2010), but remains below the OECD average (65%) and the male participation rate in Belgium (73%). Closing the gender gap in labour force participation would translate in an increase in the GDP per capita annual growth rate of 0.6 percentage points. At the same time, the “glass ceiling” which prevents women from progressing in their careers to top-level salaries seems to be less prevalent in Belgium than in other OECD countries: the gender wage gap (8.9%) is about half the size of the gap in the average OECD country (15.8%) and is roughly the same among top earners. Nevertheless, women remain under-represented in senior management functions (34%, while they represent 45% of the labour force) and in the boardroom (barely 10% of the boards of listed companies are women, despite the legal obligation to have one third of each gender in management boards). The impressive increase in parliamentary seats occupied by women, from 12% in 1995 to 39% in 2011, could be an important way of pushing ahead with gender equality in the labour market”

<http://www.oecd.org/belgium/Closing%20the%20Gender%20Gap%20-%20Belgium%20FINAL.pdf>

	Discrimination of immigrants ILO Declaration on Fundamental Principles and Rights at Work. Country reports. http://www.ilo.org/declaration/lang--en/index.htm Source of several reports. Search for 'racial discrimination', 'child labour', 'forced labour', 'gender equality', 'freedom of association'. An independent evaluation of the ILO's strategies on Fundamental Principles and Rights at Work - September 2014 declared the following: "Discrimination in employment, both direct and indirect, of equally qualified individuals is rampant across Europe and leads to the marginalization of entire ethnic groups and their inability to integrate into the wider society. Directly, it occurs in the form of legal barriers in access to legal employment such as in a system of work permits restricted to specific job categories in places like Belgium and the Czech Republic. Indirectly, it can come through limitations such as language requirements for jobs where specific language skills are not necessary." (p. 501) All of the above means that discrimination with regards to labour may occur in Belgium for immigrants who don't speak French/Flemish yet, but practises are in place to solve the problem. Bimatra does not discriminated any worker and this is also checked by PEFC/FSC inspectors one a year.
Means of Verification	· ILO conventions and documents. Existing legislation and level of enforcement
Evidence Reviewed	CNRA Belgium https://fsc.org/en/document-centre/documents/resource/397 Status of ratification of fundamental ILO conventions: http://www.ilo.org/dyn/normlex/en/f?p=1000:11001:0::NO:: or use: ILO Core Conventions Database: http://www.ilo.org/ilolex/english/docs/declworld.htm ILO Declaration on Fundamental Principles and Rights at Work. Country reports. http://www.ilo.org/declaration/lang--en/index.htm

	Source of several reports. Search for 'racial discrimination', 'child labour', 'forced labour', 'gender equality', 'freedom of association' Country report http://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102560 ILO assessment http://www.ilo.org/wcmsp5/groups/public/---ed_mas/---eval/documents/publication/wcms_315637.pdf Human Rights Watch: http://www.hrw.org/ The ITUC Global Rights Index ranks 139 countries against 97 internationally recognised indicators to assess where workers' rights are best protected, in law and in practice. The Survey provides information on violations of the rights to freedom of association, collective bargaining and strike as defined by ILO Conventions, in particular ILO Convention Nos. 87 and 98 as well as jurisprudence developed by the ILO supervisory mechanisms. http://www.ituc-csi.org/new-ituc-global-rights-index-the?lang=en OECD report http://www.oecd.org/belgium/Closing%20the%20Gender%20Gap%20-%20Belgium%20FINAL.pdf Committee on the Elimination of Discrimination against Women http://www.ohchr.org/en/hrbodies/cedaw/pages/cedawindex.aspx
Risk Rating	Low Risk
Comment or Mitigation Measure	Not Applicable

	Indicator
2.7.5	The BP has implemented appropriate control systems and procedures for verifying that feedstock is supplied using labour where the pay and employment conditions are fair and meet, or exceed, minimum requirements.
Finding	Such is covered under CNRA indicator 1.12. As an ILO member, Belgium has ratified all fundamental and governance conventions and about half of the technical conventions. There is no indication / evidence of violation of the principles and fundamental rights of the ILO (e.g. freedom of association, elimination of forced and compulsory labour, child labour, discrimination, etc) in the Belgian forest sector. The Belgian legislation on work rights is conform to the European and international requirements. There is federal legislation in place that prescribes what requirements employers have to meet. Belgium has a federal service of labour inspection that carries out inspections and checks compliance with aspects like permits, insurances and working conditions. Compliance with aspects like taxes and social security contributions are checked by the tax office. The Flemish regulations on the recognition of harvesting companies ('Erkenningsregeling exploitanten') includes mandatory training prior to the start of any harvesting operations. This ensures that persons involved in harvesting activities hold required certificates of competence for the function they carry out. Generally, specialized contractors and/or freelancers are hired to do e.g. harvesting work. It is not common to employ labourers on a temporary basis, except contractors and freelancers. It is unlikely that fraud or abuse in relation to foreign labourers or seasonal workers would occur in the Belgian forestry sector, as skilled permanent staff and/or specialized contractors are hired. The FSC Belgium working groups on Controlled Wood are stating that: 'the framework of the Belgian legislation is strong and that there are adequate control mechanisms in place to prevent violation of fundamental principles and rights of workers'. Bimatra respects all the regulations and rules about employment and keeps legally required documents or records, such as: - Register of personnel (or electronic 'dimona' declaration);

	- individual account and payslip; - Work contracts, including (if any) agreements for flexible employment or employment as student or apprentice; - work permit ('arbeidskaart' / 'permis de travail'), if any; - social security contributions ('Rijksdienst voor Sociale Zekerheid' / 'Office Nationale de Sécurité Sociale'), paid via the tax office; - documents about wood bought from public forests, identifying the company/individuals carrying out the harvesting operations. For harvesting in military areas, an attendance register is required.
Means of Verification	· Existing legislation · Level of enforcement · Regional, publicly available data from a credible third party * Bimatra records of employment
Evidence Reviewed	CNRA Belgium https://fsc.org/en/document-centre/documents/resource/397 International agreements: As an ILO member, Belgium has ratified all fundamental and governance conventions and about half of the technical conventions. Status of ratification of fundamental ILO conventions: http://www.ilo.org/dyn/normlex/en/f?p=1000:11001:0::NO:: Belgium: - Labour Law of 16 March 1971 - Law of 3 July 1978 on work contracts (and subsequent amendments) http://www.ejustice.just.fgov.be/cgi_loi/change_lg.pl?language=nl&la=N&table_name=wet&cn=1971031602; http://www.ejustice.just.fgov.be/cgi_loi/change_lg.pl?language=nl&la=N&table_name=wet&cn=1978070301); http://www.belgium.be/nl/werk/; http://www.werk.belgie.be/defaultTab.aspx?id=387#;

	http://www.rsz.fgov.be/en/employers-and-nssso/registering http://www.belgium.be/en/justice/ Annual Report 2012 of the Labour/Social Inspection, available online at: http://www.socialsecurity.fgov.be/docs/nl/publicaties/jaarrapport_si/jaarverslag-sociale-inspectie-2012-nl.pdf (in Dutch) Flanders: - Besluit Vlaamse Regering betreffende de erkenning van exploitanten 2002 (on recognition of companies harvesting wood in the forest) http://www.natuurenbos.be/nl-BE/natuurbeleid/bos/wetgeving_en_vergunning/erkenning_exploitanten International: http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO::P11200_COUNTRY_ID:102560
Risk Rating	Low Risk
Comment or Mitigation Measure	Not Applicable

	Indicator
2.8.1	The BP has implemented appropriate control systems and procedures for verifying that appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12).
Finding	Such is covered under CNRA indicator 1.11. Belgium is an ILO member and signed/ratified the (basic) conventions. There is national (federal) legislation in place that prescribes how health and safety need to be dealt with at work. Required safety measures are included in the (region-specific) terms and conditions of the wood sales for public forests and for some (large) private forests ('houtcatalogoog' /

	'cahier des charges'). Compliance is checked by a federal government inspection agency ('Arbeidsinspectie' / 'Inspection du travail') and by the competent (regional) forest and nature administration. There is an extended focus on the work environment and safety in Belgium. The employer is required to correctly instruct the workers on the use of (e.g.) machinery and H&S in general. Employees in Belgium are aware of their rights and of the legislation related to health and safety. The FSC Belgium working groups on Controlled Wood are convinced that the framework of the Belgian legislation is strong and that there are adequate control mechanisms in place to prevent infringements concerning health and safety of workers. All safety and health regulations shall be followed and all required safety equipment shall be supplied and used. Occupational health and safety requirements shall be observed by all personal involved in harvesting activities. Interviews with staff and contractors of Bimatra confirm that legally required protection equipment is required/provided by the organization and requirements are observed. Bimatra respects all the regulations and rules about health and safety and keeps legally required documents or records, such as: Belgium: - Dynamic risk management system, including a risk analysis with preventive measures - Training plan for employees; Training records - Records of (near-) accidents at work (including annual report), available with the person responsible for supervision of health and safety at work within the company Flanders and Wallonia: - Certificates of training for workers operating machines during harvesting operations FSC/PEFC inspectors also check this accomplishment by sampling once a year. Hence, the risk is considered low.
Means of Verification	· Existing legislation · Level of enforcement

	· Regional, publicly available data from a credible third party * Reports from inspectors and other records kept by Bimatra
Evidence Reviewed	CNRA Belgium https://fsc.org/en/document-centre/documents/resource/397 International agreements: As an ILO member, Belgium has ratified all fundamental and governance conventions and about half of the technical conventions. http://www.ilo.org
Risk Rating	Low Risk
Comment or Mitigation Measure	Not Applicable

	Indicator
2.9.1	Feedstock is not sourced from areas that had high carbon stocks in January 2008 and no longer have those high carbon stocks.
Finding	Wetlands, peatlands and old mature forests stands are considered to have high carbon stocks. According to the regional Forest Acts, wetlands such as peatlands and bogs are strictly protected and the majority of these areas are registered in publically available databases (and with Natura2000); special cuts may be performed here, under strict regulation in order to keep the carbon stock stable. There is thus no evidence that those areas no longer have high carbon stocks, indeed it is more likely that the carbon stock is increased with their protection. Forest operations are planned and implemented in accordance with the requirements in the Forest Acts which require protection of wetlands and peatlands. The risk is then low.
Means of Verification	· Online databases (related to Natura2000 and CBD). · Maps · Procedures and records · Regional, publicly available data from a credible third party

	The existence of a strong legal framework in the region
Evidence Reviewed	Département de la Nature et des Forêts DNF, Wallonia forest Law http://environnement.wallonie.be/legis/dnf/forets.htm Brussels capital region, Forest law http://www.ejustice.just.fgov.be/cgi_loi/change_lg.pl?language=nl&la=N&cn=2004031839&table_name=wet Natuur & Bos, Bosdecreet 1990, (Flemish forest law) https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1003183&param=inhoud&ref=search&AVIDS= EU Habitats Directive, About protected habitats and EU countries http://biodiversity.europa.eu/mtr/countries/belgium EU Habitats Directive, Belgium reporting, Article 17 report to the EU (draft data only) http://cdr.eionet.europa.eu/be/eu/art17/envujb4ka/index_html?&page=2 Convention on Biological Diversity (CBD), Country profile. https://www.cbd.int/countries/?country=ie
Risk Rating	Low Risk
Comment or Mitigation Measure	Not Applicable

	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	The 3 Regional Forest Acts gives basic protection from overexploitation of the forests. They also state the need for forest management plans, where calculations are made. The set harvest levels are justified by means of inventory and growth data, and do not threaten forest productivity or long-term economic viability. According to the Global Forest Resources Assessment 2015 for Belgium prepared by FAO, the forest area in Belgium increased by 2,200 ha between the years 2010 and 2015 (from 681,200 ha to 683,400 ha). This change is related only to Wallonia, as forest areas in Flanders and Brussels remained unchanged. In the same report, the latest available data about deforestation is from the year 2010. In 2010, 1,470 ha were deforested while 2,227 ha were reforested. Additionally, the forest expansion was 1,697 ha (1,242 ha afforestation and 455 ha natural forest expansion). The same source also show an increase in growing stock, then an increase of carbon stock. Every landowner has to follow the normal Belgian laws and regulations. Sustainable forestry is common practise because there are sound laws and regulations. Therefore, if a forest company follows the law and regulations they comply with this indicator and the risk is low. Small scale landscape elements like poplar or willows along roads or canals, or vegetation in small urban parks, or private gardens are not considered to be forest according to the forest definitions in Belgium, but still replantation is required, meaning that over the long term the carbon stock is maintained. Bimatra is also FSC/PEFC certified, thus the same indicators are followed throughout these certification systems. This indicator is then considered as low risk.
Means of Verification	Harvesting records, inventory and growth data and yield calculations demonstrate that biomass feedstock harvesting rates are not having significant negative impacts on forest productivity and long-term economic viability Documentation of Operational Practice
Evidence Reviewed	Département de la Nature et des Forêts DNF, Wallonia forest law http://environnement.wallonie.be/legis/dnf/forets.htm Brussels capital region, Forest law http://www.ejustice.just.fgov.be/cgi_loi/change_lg.pl?language=nl&la=N&cn=2004031839&ta

	ble_name=wet Natuur & Bos, Bosdecreet 1990, (Flemish forest law) https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1003183&param=inhoud&ref=search&AVIDS= FAO (2014) Global Forest Resources Assessment 2015 – Country Report, Belgium. Rome. Available at: http://www.fao.org/3/a-az164f.pdf Bos+Bosbarometer 2015, Flanders, background Belgium and stats http://www.bosplus.be/nl/publicaties/beleidsdossiers Inbo, Flanders: areas in ha https://www.inbo.be/nl/natuurindicator/oppervlakte-bos-volgens-boswijzer Inbo, Flanders: areas in ha, download Boswijzer http://www.geopunt.be/catalogus/datasetfolder/F9DDA633-1F45-483B-8227-91A466646329 Royal Belgian Institute of Natural Sciences, 2014, Fifth National Report of Belgium, to the Convention on Biological Diversity https://www.cbd.int/doc/world/be/be-nr-05-en.doc L'état de l'environnement wallon, Wallonia; Environmental outlook Wallonia 2014 http://etat.environnement.wallonie.be/index.php?page=eow-2014 Brussels capital region, Staat van het leefmilieu http://www.leefmilieu.brussels/staat-van-het-leefmilieu SRFB, The Forest of Belgium http://www.srfb.be/nl/de_belgische_bossen
Risk Rating	Low Risk
Comment or Mitigation	Not Applicable

Measure	
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