



Supply Base Report: BIMATRA bvba

First Surveillance Audit

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Completed in accordance with the Supply Base Report Template Version 1.3

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

Document history

Version 1.0: published 26 March 2015

Version 1.1 published 22 February 2016

Version 1.2 published 23 June 2016

Version 1.3 published 14 January 2019; re-published 3 April 2020

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Contents

1	Overview.....	5
2	Description of the Supply Base	6
2.1	General description	6
2.2	Actions taken to promote certification amongst feedstock supplier	10
2.3	Final harvest sampling programme	10
2.4	Flow diagram of feedstock inputs showing feedstock type [optional]	11
2.5	Quantification of the Supply Base	11
3	Requirement for a Supply Base Evaluation.....	14
4	Supply Base Evaluation.....	15
4.1	Scope	15
4.2	Justification.....	15
4.3	Results of Risk Assessment.....	15
4.4	Results of Supplier Verification Programme	16
4.5	Conclusion.....	16
5	Supply Base Evaluation Process.....	18
6	Stakeholder Consultation.....	19
6.1	Response to stakeholder comments	20
7	Overview of Initial Assessment of Risk	21
8	Supplier Verification Programme	22
8.1	Description of the Supplier Verification Programme	22
8.2	Site visits	22
8.3	Conclusions from the Supplier Verification Programme.....	22
9	Mitigation Measures	23
9.1	Mitigation measures	23
9.2	Monitoring and outcomes	24
10	Detailed Findings for Indicators	25
11	Review of Report	26
11.1	Peer review.....	26
11.2	Public or additional reviews.....	26
12	Approval of Report.....	27
13	Updates	28
13.1	Significant changes in the Supply Base	28
13.2	Effectiveness of previous mitigation measures	28
13.3	New risk ratings and mitigation measures.....	28

13.4 Actual figures for feedstock over the previous 12 months 28

13.5 Projected figures for feedstock over the next 12 months 29

Annex 1: Detailed Findings for Supply Base Evaluation Indicators30

1 Overview

Producer name: BIMATRA bvba

Producer location: Industrielaan 6, 8770 Ingelmunster, Belgium

Geographic position: 50°55'50.5"N 3°14'51.0"E (50.930694, 3.247488)

Primary contact: Bart De Clerck, +32 495294050, bart@bimatra.be

Company website: www.bimatra.be

Date report finalised: 02/Dec/2020, updated

Close of last CB audit: 28/May/2021, Ingemunster, Belgium

Name of CB: Nepcon

Translations from English: Yes

SBP Standards used: Standard 1 version 1.0, Standard 2 version 1.0, Standard 4 version 1.0, Standard 5 version 1.0

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

SBP Endorsed Regional Risk Assessment: not applicable

Weblink to SBE on Company website: www.bimatra.be/certificates/SBP

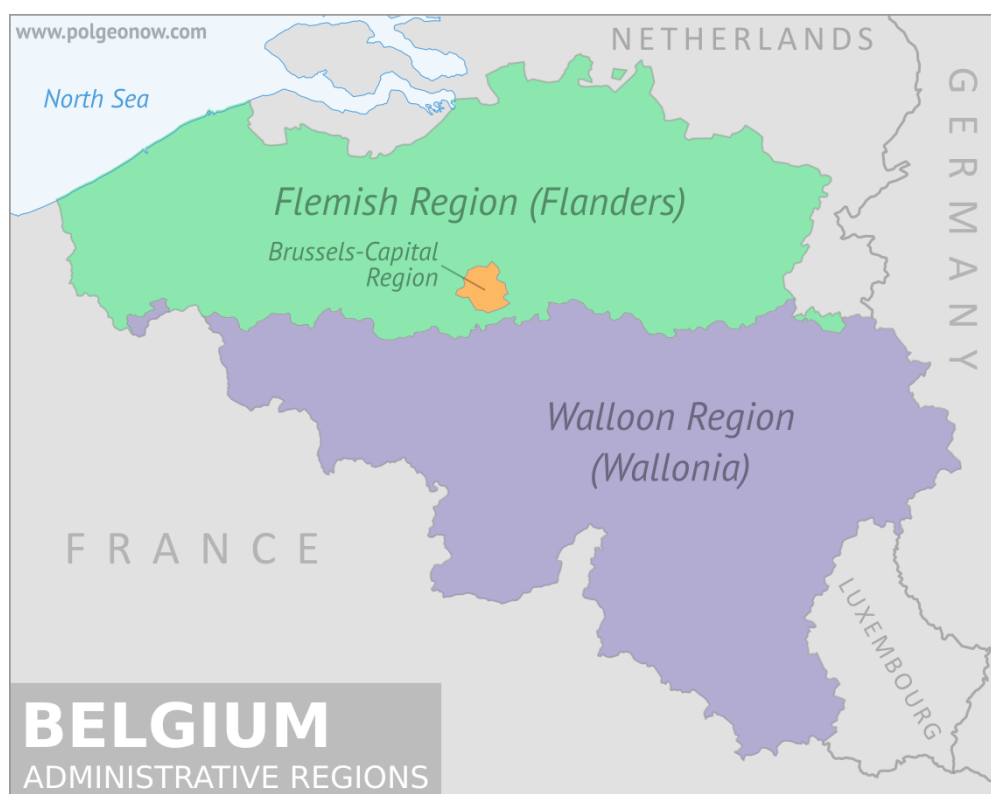
Indicate how the current evaluation fits within the cycle of Supply Base Evaluations				
Main (Initial) Evaluation	First Surveillance	Second Surveillance	Third Surveillance	Fourth Surveillance
☐	X	☐	☐	☐

2 Description of the Supply Base

2.1 General description

General summary Bimatra activities.

Bimatra is a forest contractor that produces and sells wood chips in Belgium, in Flanders (including Brussels) and Wallonia.



Wood chip production is approx. 90 000 tonnes a year. Around 35% of the primary wood chip is produced in areas outside forests, mainly roadside, riverside and train site cuttings and small plantations and in connection with nature projects. The base also includes clearing of trees and shrubs in connection with developments and expansion of infrastructure in Belgium. In the forests (65% of primary feedstock), the base is thinning of mainly broadleaves while the rest is branches and tops from both broadleaves and conifers. In Wallonia you find more often conifers.

Bimatra's supply base is the Belgian forests, roadside wood, riverside wood, nature areas and urban plantations, all over Belgium, mainly in Flandres but also a part of Wallonia (French speaking part of Belgium). Some supply (around 10% each year) comes from the South of the Netherlands, mainly Zeeland and then a part of France (nearby Belgium border). Nevertheless this SBP certification process focus on the feedstock from Belgium only, as for the other countries no SBE is made. Thus this 10% is excluded from the process.

Belgian forest owners are well-organised in various local and national associations. The 'bosgroep' is well known trade organisation of private forest owners. When looking at land ownership around 60% of the feedstock is coming from Public landowners, and 40% from private owners. As Belgium contains a large number of Natura2000 sites it is estimated that around 28% of the feedstock is coming from such sites.

Two certification options exist in forest management in Belgium: PEFC and FSC. The areas owned by the Belgian states have been mostly certified according to one or to both standards. In private and municipal forests, some have been certified according to PEFC and some according to FSC but there are also lots of (mostly small) forests that are not certified. But in Belgium you always have the obligation to plant the same number of trees you cut on the same ground or on another.

Detailed description of the supply base

Forest classification and landownership

Traditionally Belgium is divided into 3 “gewesten” or regions; the Flemish Region, the Brussels-Capital Region and the Walloon Region. For the purpose of this CNRA the same separation is made because forest law and regulations are different.

Around 22,7% of Belgium is covered with forests, **totalling a number of 692.916 hectares**. From this 78% can be found in the Walloon region, 21% in the Flemish region and 1% in the Brussels-Capital Region.

- 58% of all forests are owned by around 100.000 private owners, with an average of 2,5 ha per owner.
- 42% of the forests are owned by the public (‘gewesten/regions’ (11%), municipalities (28%), provinces and other organisation like the military (3%).

Given the historical context, all Belgian forests have been exposed to some level of forest management activities, varying from low impact to very intensive forestry. Therefore only one general forest type can be found in Belgium: ‘Semi-natural forest (planted)’. There are no ‘old growth natural’ forests, although lately natural regeneration is responsible for ‘new’ natural forests and forest management in all regions has evolved in general towards a multifunctional, semi-natural forest management.

None of the country’s primary forests remain, and 58% of existing forest cover comprises forest plantations. Forests owned by private persons are mainly plantations (predominantly poplar or pine in Flanders, and spruce or other conifers in Wallonia). Public forests, as well as forests owned by nature conservation organizations, are rather mixed forests and generally have a higher share of broadleaved tree species (oak, beech, etc.).

In general, the share of planted forest is higher in privately owned forest land compared to the share of the more semi-natural and more mixed forest lands in public lands (which were also exposed to some level of forest management). But also in public forest land, the share of planted forest is important. Nevertheless there is a strong tendency to make those forests more divers (e.g in Flanders, but also in the other regions), or maintain a balance between ‘mixed deciduous’ and ‘conifers’ (in Wallonia). When looking at tree species in planted forests, then there is a dominance of poplar and pine species in Flanders, while in the Walloon region spruce and to some extent other conifers are dominant.

With regards to legal land-use classification where forests are occurring there are two: ‘Forests (permanent, forest as land-use category)’ and ‘Other lands with trees or forest’ (trees or forest on land destined for other land-use categories). The last category are lands not classified as forest as such in the cadastre, but where trees or forests are growing. These are for example abandoned industrial lands or overgrown agricultural lands, or lands destined for building area or industrial grounds.

Forest landowners in Belgium can be Public (regional, provincial, municipality and military) and Private lands.

The official definition of forest in Flanders is: *‘forests are land areas where trees and woody shrub vegetation are the main elements, with its own flora and fauna and fulfilling one or more functions’* (Forest decree/law 1990).

The official definition of forest in Wallonia is: *‘These are lands of woods and forests such as areas covered by natural habitats, wood deposits, fauna feeding places, marshes, ponds and firebreaks.’* (Code forestier 2008).

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 (‘Natuurverweavingsgebieden’) 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 90ter 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 (so called INBO-map). As a result of this 'scoring' an online map with 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, and both the map as the system have been rolled out in 2017. Together with the map a compensation system has been agreed upon to compensate landowners for the potential loss of value of such lands. With these additional legislation and compensation measures harvesting of such forest could only be allowed after special approval of the Flemish parliament.

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. There are 9 [RAMSAR sites](#) designated (all wetlands).

Nature 2000

New Nature 2000 sites in Flanders are proposed by [INBO](#) (Institute of Nature and Forest Research). 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).

FSC certification

FSC forest certification in Belgium is mostly present in the Flemish and Brussels part, where resp. 13-15% and >99% of the forests are FSC certified. In the Walloon region the first pilot project around FSC certification is only about to start.

International agreements

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.

Scale of harvesting compared to other forest based industries in the region.

Based on [FAO resource assessment](#) 2015. In average around 3 680 000 m3 of wood is harvested each year in Belgium. Bimatra uses around 92.759 tons of woodchips per year. With an average density of 0.6 g/cm³ (or 600 kg/m³) this means around 148.000 m3 of harvested timber (wet), that is approximately 4% of the national harvest.

CITES

There are no CITES (tree/wood) species occurring in Belgian forests.

Other supply base categories.

Bimatra also buys from non-forest areas, like harvested trees besides canals, roads etc. Such areas are not considered 'forests' and are not counted in hectares in national publications. There is thus no data available for this.

Proportions of SBP feedstock product groups

SBP-compliant primary feedstock is the only product group that Bimatra has in its scope, so 100% of SBP claims are of this kind.

Feedstock types:

A	B	C	D	E	F	G	M
#	Feedstock type for biomass production	Origin	Physical Description	Country of harvest (new row for each country)	Raw mass as received in metric tonnes	Moisture % as received (weighted average, single figure) ²	Specify any pre-processing. (chipping, drying, none)
1	Thinning from (semi-)natural forests	Residues without stumps (e.g. branches and tops)	Chips	Belgium	21.604	42,47	chipping
2	Final harvest from plantations	Residues without stumps (e.g. branches and tops)	Chips	Belgium	15.558	42,47	chipping

Data is extracted from the Bimatra administration, from 2020 biomass sold as SBP-compliant to the customer.

Species mix

The following species mix is used.

Latin scientific name	CATEGORY*	French name	Flemish name	English name
<i>Abies alba</i>	1	Sapin	Zilverspar	Spruce
<i>Acer campestre</i>	2	Érable	Veldesdoorn	Maple
<i>Acer platanoides</i>	2	Érable plane	Noorse Esdoorn	Plane maple
<i>Acer pseudoplatanus</i>	2	Sycamore	Gewone esdoorn	Sycamore
<i>Alnus glutinosa</i>	2	aulne	Zwarte Els	Alder
<i>Aesculus hippocastanus</i>	2	Marroniér d'Inde	Witte paardenkastanje	
<i>Betula pendula</i>	2	Bouleau	Ruwe Berk	Birch
<i>Carpinus betulus</i>	2	Charme	Haagbeuk	Hornbeam

<i>Castanea sativa</i>	2	Châtaigner	Tamme kastanje	Chestnut
<i>Fraxinus excelsior</i>	2	Frêne	Es	Ash
<i>Picea abies</i>	1	Epicea	Fijnspar	Silver fir
<i>Pinus sylvestris</i>	1	Pin sylvestre	Grove Den	Scots pine
<i>Populus alba</i>	2	Peuplier blanc	Witte Abeel	White poplar
<i>Populus nigra</i>	2	Peuplier noir	Zwarte populier	Black poplar
<i>Populus x euramericana</i>	2	Peuplier clonale	Canadapopulier	Hybrid poplar
<i>Prunus avium</i>	2	Merisier	Zoete Kers	Cherry
<i>Prunus serotina</i>	2	cerisier tardif	Amerikaanse Vogelkers	American cherry
<i>Pseudotsuga menziesii</i>	1	Douglas	Douglaspapier	Douglas fir
<i>Quercus petraea</i>	2	Chênes sessiles	Wintereik	Sessile oak
<i>Quercus robur</i>	2	Chênes pédonculés	Zomereik	English oak
<i>Quercus rubra</i>	2	chênes rouge d'Amérique	Amerikaanse Eik	American red oak
<i>Robinia pseudoacacia</i>	2	Robinier	Robinia	Black locust
<i>Salix alba</i>	2	Saule	Wilg	Willow
<i>Sorbus aucuparia</i>	2	Sorbier des oiseleurs	Wilde Lijsterbes	Rowan
<i>Tilia cordata</i>	2	Tilleul	Winterlinde	Lime
<i>Ulmus minor</i>	2	Orme	Gladde Iep	Elm

* 1-CONIFERS 2 -BROADLEAVES

Suppliers

Bimatra has got around 6 main suppliers which provide around 80% of wood/timber and typically around 20 small companies that supply around 20% of the stock traded by Bimatra.

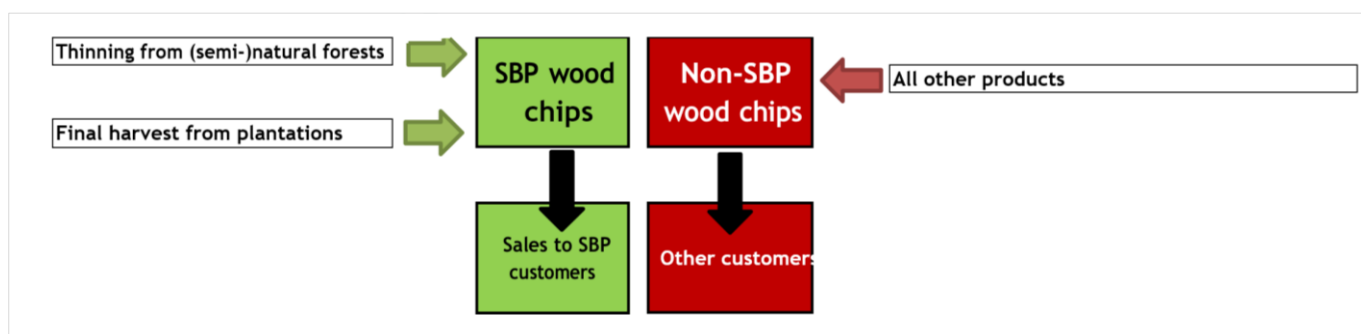
2.2 Actions taken to promote certification amongst feedstock supplier

Bimatra holds an FSC CoC certification as a group member and a 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), but sell very small quantities of certified wood at the moment as there are few forests certified.

2.3 Final harvest sampling programme

Not applicable.

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



Woodchips are sold FAS (at the port of Gent).

2.5 Quantification of the Supply Base

Supply Base

a. Total Supply Base area (ha): cumulative area of all forest types within SB	692.916 hectares
b. Tenure by type (ha): privately owned/public/community concession	58% of all forests are owned by around 100.000 <u>private</u> owners, with an average of 2,5 ha per owner. 42% of the forests are owned by the <u>public</u> ('gewesten/regions' (11%), municipalities (28%), provinces and other organisation like the military (3%).
c. Forest by type (ha): boreal/temperate/tropical	100% temperate
d. Forest by management type (ha): plantation/managed natural/natural	35% plantation, 65% from semi natural managed forests. No natural forest exists in Belgium.
e. Certified forest by scheme (ha): (e.g. hectares of FSC or PEFC-certified forest)	FSC: 25 815 ha PEFC: 300 999 ha

Feedstock

f. Total volume of Feedstock: tonnes or m3 - volume may be shown in a banding between XXX,000 to YYY,000 tonnes or m³ if a compelling justification is provided*	0 – 200,000 tonnes This is a used band, real figures are confidential because of commercial reasons, and only included in the SAR document.
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g. Volume of primary feedstock : tonnes or m ³ - volume may be shown in a banding between XXX,000 to YYY,000 tonnes or m ³ if a compelling justification is provided*	0 – 200,000 tonnes This is a used band, real figures are confidential because of commercial reasons, and only included in the SAR document.
h. List percentage of primary feedstock (g), by the following categories. - percentages may be shown in a banding between XX% to YY% if a compelling justification is provided*. Subdivide by SBP-approved Forest Management Schemes: - Certified to an SBP-approved Forest Management Scheme - Not certified to an SBP-approved Forest Management Scheme	Certified: 0% of total annual feedstock Not certified: 100%. (Over the last reporting period around 10% came from certified sources, but were not sold to Bimatra with such a claim). Therefore 0% at the moment.
i. List all species in primary feedstock, including scientific name	See table under 2.1
j. Volume of primary feedstock from primary forest	0% (no primary forests remain in Belgium)
k. List percentage of primary feedstock from primary forest (j), by the following categories. Subdivide by SBP-approved Forest Management Schemes: - Primary feedstock from primary forest certified to an SBP-approved Forest Management Scheme	NA

- * Compelling justification would be specific evidence that, for example, disclosure of the exact figure would reveal commercially sensitive information that could be used by competitors to gain competitive advantage. State the reasons why the information is commercially sensitive, for example, what competitors would be able to do or determine with knowledge of the information.

Bands for (f) and (g) are:

1. 0 – 200,000 tonnes or m³
2. 200,000 – 400,000 tonnes or m³
3. 400,000 – 600,000 tonnes or m³
4. 600,000 – 800,000 tonnes or m³
5. 800,000 – 1,000,000 tonnes or m³
6. >1,000, 000 tonnes or m³

Bands for (h), (l) and (m) are:

1. 0%-19%
2. 20%-39%
3. 40%-59%
4. 60%-79%
5. 80%-100%

NB: Percentage values are calculated as rounded-up integers.

3 Requirement for a Supply Base Evaluation

SBE completed	SBE not completed
x	☐

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

The scope of SBE is:

- the Supply Base, which includes forest areas and plantations from Belgium, where the following operations are performed: thinnings in semi-natural forests and final harvest of (mainly poplar) plantations;
- wood processing (chipping) and trading operations by Bimatra.

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 for stakeholder consultation.

4.3 Results of Risk Assessment

The risk assessment in 2019 identified 0 risks, but 2020 updating identified six (6) specified risks, already with mitigation measures in place (even before SBP certification), related to the following indicators:

- 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;
- 2.1.1 The Biomass Producer has implemented appropriate control systems and procedures for verifying that forests and other areas with high conservation values are identified and mapped;
- 2.1.2 The Biomass Producer has implemented appropriate control systems and procedures to identify and address potential threats to forests and other areas with high conservation values from forest management activities;
- 2.2.1 The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them;

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

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

All the other indicators were found to be low risk.

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: 2 feedstocks are taking into account for this SBP certification process. And all of them are leading to woodchips. Sub-scope are not needed as risks are the same for all.
- Raw material: All woodchips are made from either logs or branches, and they are coming from the entire supply base. Not a proper sub-scope as risks are the same for all, all come from trees and shrubs.
- Geographical: 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.

4.4 Results of Supplier Verification Programme

Not applicable, as there were no unspecified risks.

4.5 Conclusion

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

For few indicators potential risks were found, but Bimatra had implemented some standard operational procedures for mitigating these risks. This 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;
- Woodchips mainly come from forest stands subject to selvicultural operations; the ecological, economic and social impact of these operations are positive, since they are aimed to maintenance of the forests or woodlands;
- Woodchips also come from plantations (poplars) that usually are re-planted at local level.
- Bimatra trades common tree species only and not protected species;
- Bimatra has several years of experience in the field and holds PEFC/FSC certificates;
- 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.

The team working 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 has contracted the [Forestry Service Group](#) to assist with the SBE. They are 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 includes stakeholder consultation and the risk assessment is done in a team effort where international consultants work with a larger group of local experts. It includes 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 used as the backbone of this document.

One consultant was involved in supervising documents in 2019 and updating the 2020 documents: Simona Ferutta, M.Sc. in Forestry and Environmental Sciences, 24 years of experience in forestry and various certification (ISO, PEFC, FSC, ISCC, SBP).

6 Stakeholder Consultation

The first consultation phase ran for a period of 30 days 17th of October till the 17th of November 2019. The SBR summary plus an introduction letter was sent by e-mail to a list of stakeholders, with the request to comment. Bimatra took a great effort to make sure stakeholders of the following groups were approached (one for each group was a least targeted): suppliers, customers, sector associations, national NGOs (WWF, Natuurpunt, etc), universities, umbrella organizations, municipalities and larger governmental services (state forest).

BIMATRA STAKEHOLDER LIST

CATEGORY OF STAKEHOLDER	NAME	CITY / HEADQUARTER / STATE	E-mail address	Affected or Interested
Supplier	Dedoncker P&G BVBA	Gooik	gerrit@populier.be	Affected
Supplier	De Clercq – Bourdeaud'Hui NV	Brakel	isabel@dcbb.be	Affected
Supplier	De Clercq hout CV	Brakel	de.clercq.stefaan@telenet.be	Affected
Supplier	GVO Forest	Bever	vanouytselgeert@icloud.com	Affected
Supplier	Geert Van de Wynckel	Maldegem	Geert.vdw@hotmail.com	Affected
Customer	DUFERCO BIOMASSE	Italy	p.micheli@dufercobiomasse.com	Affected
Customer consultant	FERUTTA Simona	Italy	simona.ferutta@fastwebnet.it	Interested
Customer	Bois Energie France – Est	France	dimitri.pascal@dalkia.fr	Affected
Customer	Bois Energie France – Nord-Ouest	France	Maxence.pottier@boisenergienordouest.fr	Affected
Customer	Picardie Biomasse Energie	France	Amelie.cathala@pbenergie.com	Affected
Customer	2Valorise Materials	Amel	Alexander.verbesselt@2valorise.be	Affected
International association	PEFC Belgium	Brussels	info@pefc.be	Interested
International association	FSC Belgium	Heverlee	info@fsc.be	Interested
University	Division Forest,	Leuven-Heverlee	fnlcommunications@kuleuven.be	Interested

	Nature and Landscape GEO-Instituut			
Municipality	Ingelmuster	Ingelmuster	gemeente@ingelmunster.be	Interested
Governmental service	Belgian Nature and Forestry Agency	Brussels	anb@vlaanderen.be	Interested
Research Institute	INBO	Brussels	info@inbo.be	Interested

6.1 Response to stakeholder comments

No response were received at the end of the consultation period, but any later comment will be taken into account anyway.

7 Overview of Initial Assessment of Risk

In 2020 Six specified risks were identified, but for some of them mitigation measures were already in place, even if not identified as such in the first assessment. Further mitigation measures were implemented.

Table 1. 2020 Overview of results from the risk assessment of all Indicators (prior to SVP)

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

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

8 Supplier Verification Programme

8.1 Description of the Supplier Verification Programme

Supplier verification program was not developed, because for Bimatra no unspecified risks were identified in Risk Assessment (4.3).

8.2 Site visits

Not applicable.

8.3 Conclusions from the Supplier Verification Programme

Not applicable.

9 Mitigation Measures

9.1 Mitigation measures

For each specified risk, mitigation measures were identified in 2020 as follows.

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.
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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 data and information about legal requirements.

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

2.1.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that forests and other areas with high conservation values are identified and mapped.
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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 & 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 information about each wood chipping are collected in BIMATRA form 'Feedstock checklist' and actions are taken subsequently consequently.

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

In the contractors manual there is a small risk assessment presented. With this assessment potential risks while harvesting are identified as part of the company 'good practises'. These information about each wood chipping are collected in BIMATRA form 'Feedstock checklist' and actions are taken subsequently consequently.

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

Just for private forest in Wallonia and non-forest sites in the contractors manual there is a small risk assessment presented. With this assessment potential risks while harvesting should be identified as part of the company 'good practises'. These information about each wood chipping are collected in BIMATRA form 'Feedstock checklist' and actions are taken subsequently consequently.

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

Potential risks while harvesting 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.

2.2.4	The Biomass Producer has implemented appropriate control systems and procedures to ensure that biodiversity is protected (CPET S5b).
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Mitigation measure:

Potential risks while harvesting 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.

9.2 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.

10 Detailed Findings for Indicators

Detailed findings for each Indicator are given in Annex 1.

11 Review of Report

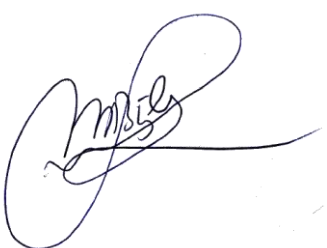
11.1 Peer review

No peer review was done prior to finalisation.

11.2 Public or additional reviews

Not applicable.

12 Approval of Report

Approval of Supply Base Report by senior management			
Report Prepared by:	Marco Bijl 	Director FSG	06 nov. 2020
	Name	Title	Date
Report revised by:	Simona Ferutta 	Consultant	30 nov. 2020
	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 	Director Bimatra	30 nov. 2020
	Name	Title	Date

13 Updates

Updated in 2020, as risk ratings were revised.

13.1 Significant changes in the Supply Base

None

13.2 Effectiveness of previous mitigation measures

No mitigation measure identified during the first evaluation.

13.3 New risk ratings and mitigation measures

Six new specified risks were identified in 2020 updating, with mitigation measures (see 9.1):

- **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.
- **2.1.1** The Biomass Producer has implemented appropriate control systems and procedures for verifying that forests and other areas with high conservation values are identified and mapped.
- **2.1.2** The Biomass Producer has implemented appropriate control systems and procedures to identify and address potential threats to forests and other areas with high conservation values from forest management activities.
- **2.2.1** The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them.
- **2.2.3** The Biomass Producer has implemented appropriate control systems and procedures to ensure that key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).
- **2.2.4** The Biomass Producer has implemented appropriate control systems and procedures to ensure that biodiversity is protected (CPET S5b).

13.4 Actual figures for feedstock over the previous 12 months

Reporting period: the previous 12 month period (Dec 2019-Nov 2020).

Total volume of Feedstock: tonnes or m3 -	0-200.000 tons
Volume of primary feedstock : tonnes	0-200.000tonnes
List percentage of primary feedstock Certified to an SBP-approved Forest Management Scheme Not certified to an SBP-approved Forest Management Scheme	Certified: 0% Not certified: 100%

List all species in primary feedstock, including scientific name	See table under 2.1
Volume of primary feedstock from primary forest	0% (no primary forests remains in Belgium)
List percentage of primary feedstock from primary forest	NA
Volume of secondary feedstock:	NA
Volume of tertiary feedstock:	NA

The disclosure of the exact figure would reveal commercially sensitive information that could be used by competitors to gain competitive advantage, since they don't know at the moment their exact amount of biomass and they could figure from that also the total timber handled every year and the share of the market.

13.5 Projected figures for feedstock over the next 12 months

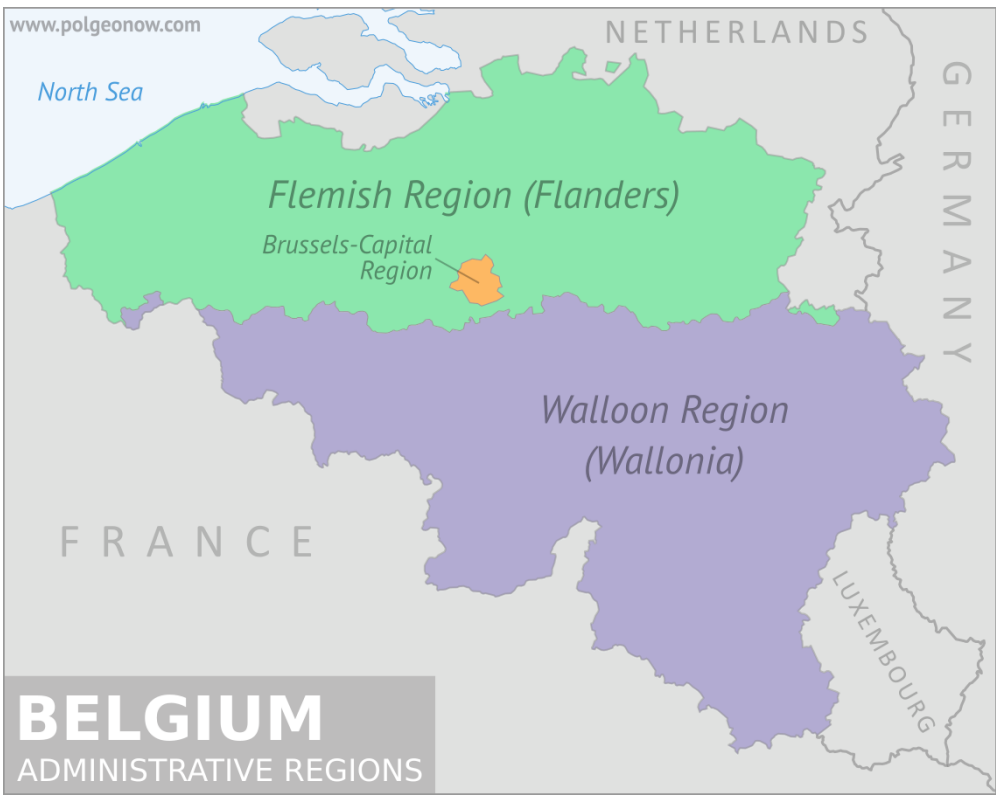
These will be similar to last reporting period. Although Bimatra is intending to chip more material with their own machines (planting in progress).

- * Compelling justification would be specific evidence that, for example, disclosure of the exact figure would reveal commercially sensitive information that could be used by competitors to gain competitive advantage. State the reasons why the information is commercially sensitive, for example, what competitors would be able to do or determine with knowledge of the information.

Bands are:

1. 0 – 200,000 tonnes or m³
2. 200,000 – 400,000 tonnes or m³
3. 400,000 – 600,000 tonnes or m³
4. 600,000 – 800,000 tonnes or m³
5. 800,000 – 1,000,000 tonnes or m³
6. >1,000, 000 tonnes or m³

Annex 1: Detailed Findings for Supply Base Evaluation Indicators

	Indicator
1.1.1	The Biomass Producer's Supply Base is defined and mapped.
Finding	The Biomass Producer's Supply Base is defined as Belgium (both Flanders and Wallonia regions countryside).  The map shows Belgium divided into three administrative regions: the Flemish Region (Flanders) in green, the Brussels-Capital Region in orange, and the Walloon Region (Wallonia) in purple. The map is bordered by the Netherlands to the north, Germany to the east, France to the west, and Luxembourg to the south. The North Sea is visible to the west. The text 'BELGIUM ADMINISTRATIVE REGIONS' is at the bottom left of the map area. The source 'www.polgeonow.com' is at the top left.
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 annual database (Excel). • Records with each harvesting/trading contract.
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

Comment or Mitigation Measure	
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	Indicator
1.1.2	Feedstock can be traced back to the defined Supply Base.
Finding	Feedstock informations can be found in Excel files and the 2nd chapter of the SBE document. Data is updated every year and each year a forecast is also made. Due to the wide variety of often small suppliers Bimatra decided to register each harvesting site with a map/location along the normal supply base information. When buying from other, often larger traders, documentation will also need to include information about origin and SBP-approved Forest Management Schemes, if any, and other accepted claims (like FSC). In that way feedstock could be traced back to these third party traders. In this way all feedstock can be traced till the moment it enters the port facility (and the ownership transfers to the customers). All larger supply without claims, or any supply without traceability documents will not be used as SBP. The Bimatra management procedures and documents are prepared for such recordings. If it proves that biomass is bought or traded that cannot enter the SBP chain this biomass has to be physically separated from the SBP biomass in the harbour facility.
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 annual database (Excel). • Records with each harvesting/trading contract. • Management reviews.
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA
Comment or Mitigation Measure	All documents are re-assessed every year by means of the management review.

	Indicator																																
1.1.3	The feedstock input profile is described and categorised by the mix of inputs.																																
Finding	Such can be found in chapter 2 of the SBE and the Bimatra databases. The feedstock types are 2: 1 – thinnigs in forests/woodlands; 2 – final harvest from plantations (mainly poplar plantations). 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 (from 2020 biomass sold as SBP to the customer). Data is extracted from the Bimatra administration. <table><tr><th>A</th><th>B</th><th>C</th><th>D</th><th>E</th><th>F</th><th>G</th><th>M</th></tr><tr><th>#</th><th>Feedstock type for biomass production</th><th>Origin</th><th>Physical Description</th><th>Country of harvest (new row for each country)</th><th>Raw mass as received in metric tonnes</th><th>Moisture % as received (weighted average, single figure)²</th><th>Specify any pre-processing. (chipping, drying, none)</th></tr><tr><td>1</td><td>Thinning from (semi-)natural forests</td><td>Residues without stumps (e.g. branches and tops)</td><td>Chips</td><td>Belgium</td><td>21.604</td><td>42,47</td><td>chipping</td></tr><tr><td>2</td><td>Final harvest from plantations</td><td>Residues without stumps (e.g. branches and tops)</td><td>Chips</td><td>Belgium</td><td>15.558</td><td>42,47</td><td>chipping</td></tr></table> Such is also summarized in the SAR document. Data of raw mass are provided from quantities delivered to the port of Ghent (the stock sold from December 2019 till November 2020). Data of moisture are provided from real figures of biomass charged as SBP on 5 vessels in 2020, coming from the stock above.	A	B	C	D	E	F	G	M	#	Feedstock type for biomass production	Origin	Physical Description	Country of harvest (new row for each country)	Raw mass as received in metric tonnes	Moisture % as received (weighted average, single figure) ²	Specify any pre-processing. (chipping, drying, none)	1	Thinning from (semi-)natural forests	Residues without stumps (e.g. branches and tops)	Chips	Belgium	21.604	42,47	chipping	2	Final harvest from plantations	Residues without stumps (e.g. branches and tops)	Chips	Belgium	15.558	42,47	chipping
A	B	C	D	E	F	G	M																										
#	Feedstock type for biomass production	Origin	Physical Description	Country of harvest (new row for each country)	Raw mass as received in metric tonnes	Moisture % as received (weighted average, single figure) ²	Specify any pre-processing. (chipping, drying, none)																										
1	Thinning from (semi-)natural forests	Residues without stumps (e.g. branches and tops)	Chips	Belgium	21.604	42,47	chipping																										
2	Final harvest from plantations	Residues without stumps (e.g. branches and tops)	Chips	Belgium	15.558	42,47	chipping																										
Means of Verification	- Bimatra annual database (Excel) with all Supply base data. - Records with each harvesting/trading contract; maps/locations, invoices, claim documents. - SAR document.																																
Evidence Reviewed	- Bimatra Management Manual - Bimatra SBE document. - Bimatra annual database (Excel).																																

	- Records with each harvesting/trading contract. - SAR document.
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
1.2.1	The Biomass Producer has implemented appropriate control systems and procedures to ensure that legality of ownership and land use can be demonstrated for the Supply Base.
Finding	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 relatively 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). <i>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 low.</i>
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 <u>Belgium:</u> - 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') <u>Flanders:</u> - 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) <u>Wallonia:</u> - 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 Reviewed	Applicable laws and regulations CNRA Belgium https://fsc.org/en/document-centre/documents/resource/397 <u>Belgium:</u> - 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' <u>Specifically for Flanders:</u>

	- 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) <u>Specifically for Wallonia:</u> - 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) <u>Others:</u> <u>Belgium:</u> 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 <u>Flanders:</u> 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 <u>Wallonia:</u> http://environnement.Wallonia.be/legis/dnf/forets/foret025.htm ('Code forestier' 2008) http://ccff02.minfin.fgov.be/KMWeb/document.do?method=view&id=347cb717-e6e1-4fc2-a753-d4e9e84d5f75#findHighlighted
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
1.3.1	The BP has implemented appropriate control systems and procedures to ensure that feedstock is legally harvested and supplied and is in compliance with EUTR legality requirements.
Finding	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 will report (every two years) to the Commission on the application of the Regulation. For domestic wood (from Belgian forests): 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 EU TR. 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 EU TR ('Infofiche : Toepassings 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. However, apart from the EU 'guidance document' to the EUTR, there are currently no specific guidelines or templates (on format and content) for the 'due diligence system' in Belgium. At present only a limited number of 'operators' (forest owners, companies harvesting in the forests, and wood importers) have a true 'due diligence system' in place. In most cases the 'basic information' (step 1) is available (although often not systematically kept in a database), but a formal 'risk evaluation procedure' (step 2) and 'risk reduction procedure' (step 3) is lacking. So far, no 'due diligence systems' (other than those for certified wood and legality-verified wood) have as such been certified by independent monitoring organizations (or certification bodies) active in Belgium. Furthermore, given the limited capacity (personnel) of the inspection agencies (Product Policy Unit of the competent Federal Public Service Public

	Health, Security of the Food Chain, and Environment) priorities for inspections are currently at the (higher-risk activities of) companies importing non-domestic wood. There is limited evidence to suggest that the DDS requirements are uniformly enforced at forest level. Nevertheless there are other sources that could be used to judge if such limited EUTR implementation has an actual negative 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. The risk is then identified as specified.
Means of Verification	- Supplier invoices, packing lists / delivery notes, and transport documents (CMR, CIM, airway bill, bill of lading) - 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) - Timber and timber products covered by valid FLEGT or CITES licenses are considered to comply with the requirements of the Regulation.
Evidence Reviewed	CNRA Belgium https://fsc.org/en/document-centre/documents/resource/397 <u>European Union:</u> - 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) <u>Belgium:</u> - 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 <u>Others:</u> 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#.VFflPrt0ycw
Risk Rating	☐ Low Risk x Specified Risk ☐ Unspecified Risk at RA
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.

	Indicator
1.4.1	The Biomass Producer has implemented appropriate control systems and procedures to verify that payments for harvest rights and timber, including duties, relevant royalties and taxes related to timber harvesting, are complete and up to date.
Finding	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: <i>"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"</i>. The indicator assesses the situation for Belgium as low risk.
Means of Verification	NA

Evidence Reviewed	CNRA Belgium https://fsc.org/en/document-centre/documents/resource/397
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
1.5.1	The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is supplied in compliance with the requirements of CITES.
Finding	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 <u>European Union:</u> 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) <u>Belgium:</u> 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 <u>Others:</u> http://www.ejustice.just.fgov.be/cgi_loi/chang_e_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 ☐ Specified Risk ☐ Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
1.6.1	The Biomass Producer has implemented appropriate control systems and procedures to ensure that feedstock is not sourced from areas where there are violations of traditional or civil rights.
Finding	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	<u>Belgium:</u> - 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 ☐ Specified Risk ☐ Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator						
2.1.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that forests and other areas with high conservation values are identified and mapped.						
Finding	HCV's 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:						
	<table><tr><th>HCV cat</th><th>Conclusion (as stated in the CNRA,conclusions are based on about 25 pages of evidences, which we cannot all repeat here).</th></tr><tr><td>1</td><td>Flanders: 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.</td></tr><tr><td>2</td><td>Landscape-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.</td></tr></table>	HCV cat	Conclusion (as stated in the CNRA,conclusions are based on about 25 pages of evidences, which we cannot all repeat here).	1	Flanders: 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.	2	Landscape-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.
	HCV cat	Conclusion (as stated in the CNRA,conclusions are based on about 25 pages of evidences, which we cannot all repeat here).					
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		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.
	3	Habitat 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.
	4	Forests 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
	5	This 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.
	6	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. 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 <u>Flanders</u> 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 (<i>Parcs Naturels</i>), 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 <u>outside</u> 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 <u>decision to increase the level of protection</u> 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 <u>Wallonia</u> 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 <u>Brussels capital region</u> Natura2000 and Speciale Beschermings Zone's (SBZ) can be found. In <u>Belgium</u> there are no forest ecosystems that are classified as a <i>Global 200 Ecoregion</i>. There are 9 Priority forest habitats recognised under the EU Habitats Directive (see below). There are 9 <u>RAMSAR sites</u> designated (all wetlands). Nature 2000 New Nature 2000 sites in <u>Flanders</u> are proposed by <u>INBO</u>. 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 <u>Wallonia</u> 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 <u>decree of designation</u> 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 definitions in Belgium. 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 should 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). It 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 substantially 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 HCV's 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=se arch&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=CjwKEAjsr-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	☐ Low Risk ☒ Specified Risk ☐ Unspecified Risk at RA
Comment or 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 & 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.

	Indicator
2.1.2	The Biomass Producer has implemented appropriate control systems and procedures to identify and address potential threats to forests and other areas with high conservation values from forest management activities.
Finding	Following the CNRA cat 3 the main threats to HCVs from forest management activities are: 'Land conversion: -whether for urban and industrial expansion, agriculture, infrastructure or tourism- is undoubtedly the main cause in Belgium. It results in the loss, degradation or fragmentation of habitats, and currently affects all habitat types.' Other mentioned threats to HCVs in general are Pollution, Recreational pressure, Invasive species and Climate change. Based on the conclusion of the Royal Belgian Institute of Natural Sciences we could conclude that threats from regular Forest Management activities as such are not causing major risks for HCVs in Belgium. 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 <u>are not considered to be forest</u> according to the forest definitions in Belgium. Such sites are not even counted in the total forest areas in the country. There is also no '<u>forest management</u>' as such because for these 'landscape elements' no forest management is applicable. The CNRA with regards to this aspect is low risk for 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	☐ Low Risk ☒ Specified Risk ☐ Unspecified Risk at RA

Comment or Mitigation Measure	In the contractors manual there is a small risk assessment presented. With this assessment potential risks while harvesting 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.
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	Indicator
2.1.3	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not sourced from forests converted to production plantation forest or non-forest lands after January 2008.
Finding	CNRA indicator 4. Assessment based on legality. Content of law. <u>Flanders:</u> 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. There is no legislation regulating conversion of natural forests to plantations. Moreover, Belgium forests are mainly semi-natural forests. <u>Wallonia:</u> 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'). Is the law enforced? <u>Flanders:</u> The forest administration carries out field verification of compensation measures, i.e., re- 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 sufficient, with a reasonable capacity of forest guards and inspectors. Notifications of deforestation (either 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. Notifications lead to effective actions in cases of (illegal) deforestation. <u>Wallonia:</u> 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 sufficient. 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). The participants agreed that the risk can be considered low.

Is it possible to conclude that the spatial threshold can be met by assessing the enforcement of legislation?

No, the applicable legislation is not sufficient to assess this indicator with the legally-based thresholds. As conversion is allowed in some circumstances with a permit and compensation measures may not require reforestation, it is not possible to conclude that the spatial threshold can be met by assessing the enforcement of legislation.

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 on one hand 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), but indeed needs to improve (over time) in its accuracy (reducing error margins).

According to the Flemish forest and nature law enforcement report ('ANB Handhavingsrapport 2013') little deforestation is observed (or detected) in Flanders. The illegally deforested surface area was about 13 hectares in 2013 (back from over 27 hectares in 2011). The trend of illegal deforestation is decreasing.

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. Is it possible to conclude that the spatial threshold (0.02% or 5000 ha) is met? Small scale landscape elements like poplar or willows along roads or canals, or vegetation in small urban parks, or private gardens <u>are not considered to be forest</u> 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. Risk designation: Low risk.
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). Monitoring records.
Evidence Reviewed	CNRA Belgium https://fsc.org/en/document-centre/documents/resource/397 <u>Belgium:</u> - Royal Decree of 28 December 1972 organization and application of spatial plans ('Gewestplannen' / 'Plans de secteur') <u>Flanders:</u> - 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) <u>Wallonia:</u> - 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.Wallonie.be/legis/menucode.htm> (Code de l' Environnement)
<http://wallex.Wallonie.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 ☐ Specified Risk ☐ Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.2.1	The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them.
Finding	The Biomass Producer should rely on existing laws and regulations with regards to this topic. 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. This means that there is national system that guarantees that this 2.2.1 indicator is not at 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 generally 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 this is not the case. In Flanders 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 permit, and also no FMP. Except when these private owners are in Natura 2000. In that case a Forest management plan is obligatory. Wallonia fully relies on the Forest Code (the regional law). Even when there are no specified

	terms and conditions, forest exploitation shall be carried out within the limits of the Forest Code. And 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). <u>Inspection & monitoring reports Wallonia.</u> 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 <u>Forestry Code</u> increased by a factor of 6 in 2017 (from 1.8% to 11.1%). This development 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. <u>Wood with non-forest origin.</u> 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 <u>are not considered to be forest</u> according to the forest definitions in Belgium. 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. Risk conclusion: 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 Biomass producer should have access to harvesting permits to secure this. The risk is thus low, except for private owners in Wallonia and for non-forest sites, where harvesting permits are not required and can thus not be requested; 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 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/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 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	☐ Low Risk x Specified Risk RA ☐ Unspecified Risk at RA
Comment or Mitigation Measure	Just for private forest in Wallonia and non-forest sites in the contractors manual there is a small risk assessment presented. 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.

	Indicator
2.2.2	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b).
Finding	The Biomass Producer should rely on existing laws and regulations with regards to this topic. 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. This means that there is national system that guarantees that this 2.2.1 indicator is not at 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. It means that wood harvested in Belgium could not have decreased the soil quality. 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. Even with an increase in biomass production the practice of leaving leaves and needles in the forest stands is not expected to change as the technical requirements set by the converters regarding water content in the biomass prevent the production of 'green' biomass, i.e. biomass containing fresh leaves and needles. The removal of plant nutrients over a rotation period should be evaluated against the pool of nutrients that the location can produce through weathering of soil minerals or air deposition. On very nutrient--poor soils the removal of nutrients through wood extraction can exceed the nutrients that are added from weathering and deposition and thereby lead to a long--term decrease in the nutrient pool. Forest owners can compensate for nutrient loss by spreading ash from wood biomass in the stands. The University of Copenhagen has developed a tool (ESBEN) to help calculate the nutrient balance of forest stands in connection with biomass extraction and to evaluate the effectiveness of adding nutrients to the forest stand by spreading ash from wooden biomass in the stands. It should be mentioned that biomass to some very limited extent is harvested from areas like heaths and bogs where the aim is to keep the soil nutrient levels low but not decreased (as specified in the paperworks of specific projects), as this is a characteristic of this type of landscape.

	On such limited areas for specific projects all biomass of some trees (not all) including needles and leaves is removed in connection with chipping. As a result soil quality is maintained but not improved. 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. Thus, there are common technical solutions to minimising impacts on soils, e.g. wider tyres with forest--specific design; machines operated in a fashion that takes soil conditions into account. Operations are often moved or rescheduled if the soil is waterlogged, so undue soil damage can be avoided. In all such cases of heaths and bogs the normal legislations are to be followed and as such these are very strict as it comes to fragile areas like this. In all cases regular harvesting is not allowed anyway because they are part of Natura2000. But in some cases trees and bushes are removed to keep the original habitat in place. Risk conclusion: 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 and the possibility of adding nutrients to compensate for net loss. 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--67. 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--9. Copenhagen, January. Retrieved from: https://tidsskrift.dk/index.php/geografisktidskrift/article/view/4477/8383
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

Comment or Mitigation Measure	
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	Indicator																
2.2.3	The Biomass Producer has implemented appropriate control systems and procedures to ensure that key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).																
Finding	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.. 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 practice in the field with felling/harvesting licenses (and also about FMPs). This means that it is assessed if the current system in place results 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. By looking at this we will decide if all implemented regulations and enforcement actually result in increased habitat levels. We realize that such levels only increase after some time, thus conclusions based on this assessment will only act as guidance. This habitat level assessment we carry out for the country as a whole because Belgium also reports on country level to the Convention on Biological Diversity (CBD). In all 3 regions priority habitats are included in the Natura 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) <table> <tr> <td>Code</td><td>Habitat</td></tr> <tr> <td>9110</td><td>Luzulo-Fagetum beech forests</td></tr> <tr> <td>9120</td><td>Atlantic acidophilous beech forests with Ilex and sometimes also Taxus in the shrub layer (Quercion robur-petraeae or Ilici-Fagenion)</td></tr> <tr> <td>9130</td><td>Asperulo-Fagetum beech forests</td></tr> <tr> <td>9150</td><td>Medio-European limestone beech forests of the Cephalantho-Fagenion</td></tr> <tr> <td>9160</td><td>Sub-Atlantic & medio-EU oak or oak-hornbeam forests of Carpinion betuli</td></tr> <tr> <td>9180</td><td>* Tilio-Acerion forests of slopes, screes and ravines</td></tr> <tr> <td>9190</td><td>Old acidophilous oak woods with Quercus robur on sandy plains</td></tr> </table>	Code	Habitat	9110	Luzulo-Fagetum beech forests	9120	Atlantic acidophilous beech forests with Ilex and sometimes also Taxus in the shrub layer (Quercion robur-petraeae or Ilici-Fagenion)	9130	Asperulo-Fagetum beech forests	9150	Medio-European limestone beech forests of the Cephalantho-Fagenion	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
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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 <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (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. <i>Conclusions</i> Habitat levels show a mixed picture (see above) 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. The daily practise in the field, with permits and the online map systems are publically available. The law enforcement is effective in Belgium (see full assessment under CNRA HCV 1). As a BP producer there is need to ensure with procedures that key ecosystems and habitats are conserved. Based on the above sub-assessments we classify the indicator as 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/envuib4ka/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	☐ Low Risk ☒ Specified Risk ☐ Unspecified Risk at RA
Comment or Mitigation Measure	Potential risks while harvesting 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
2.2.4	The Biomass Producer 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 <u>Strategic Plan</u> 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 <u>Strategy</u> 2006-2016 and an <u>update</u> 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 <i>National Biodiversity Strategy</i> each of 3 regions developed their own <i>regional</i> strategic documents and action plans in relation to biodiversity: <u>The Walloon region</u> is renewing the strategic plan at this moment (2016). All information regarding biodiversity is combined on one single <u>website</u>.

	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 <u>Natura 2000</u> network in <u>Wallonia</u> 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 (<u>Walloon</u> 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, as most (but not all) other protection classes and types are included In the Natura 2000 network. 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 <u>Natura 2000</u> network in <u>Flanders</u> 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 (<u>Flemish</u> 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, as most (but not all) other protection classes and types are included In the Natura 2000 network. 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 <u>Natura 2000</u> network in <u>Brussels Capital</u> 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 (<u>Brussels</u>). 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, as most (but not all) other protection classes and types are included In the Natura 2000 network. <i>Risk conclusion:</i> 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/strataactplan 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	☐ Low Risk ☒ Specified Risk ☐ Unspecified Risk at RA
Comment or Mitigation Measure	Potential risks while harvesting 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 Biomass Producer has implemented appropriate control systems and procedures for verifying that the process of residue removal minimises harm to ecosystems.
Finding	The 3 Belgian Forest Acts (one for each region) are stating 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. Residues are to be removed in connection with thinnings, selective logging and clear cuts, carried out as an integrated part of the logging operations in forests. It is common practice to remove residues after felling operations, either for the production of biomass feedstock, or for firewood. Some stakeholders mention that there is a risk of increased removal of dead wood from forest stands as a consequence of biomass extraction. Due to the technical requirements that the biomass shall fulfil with regards to humidity and density, it is generally 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. The chipping of tree branches and tree tops is likely to result in a reduction of the quantity of small dimension residues left in the forest stands. This practice is considered to be compliant with the criteria because the negative impact on ecosystems caused by removal of small dimension tree branches and tops at the current scale and practice, leaving leaves and branches in the forests, is considered to be low. Removal of residues occur in connection with removal of wood vegetation from protected open habitats like heaths and bogs where the aim is to regulate the wood vegetation in order to maintain the characteristic of these open

	habitats. As these habitats are generally protected by law the removal of wooden vegetation shall be carried out without negative impact on the ecosystem and consequently it would be illegal if residues are removed in a way that causes harm to these ecosystems. There are currently no reports or other types of evidence indicating that the process of residue removal from forest stands or protected open habitats cause harm to the ecosystems at a scale that result in specified risk. If a BP company is following the normal law and regulations they will comply with this indicator and the risk will be low. <i>Risk conclusion:</i> 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 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	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 ☐ Specified Risk ☐ Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.2.6	The Biomass Producer has implemented appropriate control systems and procedures to verify that negative impacts on ground water, surface water and water downstream from forest management are minimised (CPET S5b).

Finding	This indicator can be answered by CNRA indicator 3.4. (Critical ecosystem services). Under this indicator we assess if there are forests present and classified as important for erosion control, preventing of flooding, barriers from destructive fire and clean water catchments. We also assess if forest management activities are threatening these areas. In Belgium forests are not categorized by the 'functions' as mentioned above. This means that we cannot judge officially if there are forests present and classified as important for erosion control, preventing of flooding and barriers from destructive fire. Thus we have to assess this in a more general way in some cases, one by one. Forests acting as protection against erosion and flooding. Officially there are no special forests classified as important for the protection of flooding or erosion. Nevertheless we need to assess if there is a potential problem with flooding and if there is a risk of forest management contributing to this problem. 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 will need to give their approval, and they are checking the location and importance with regards to protection levels (see above). In public lands the same organisations are actually <u>managing</u> the forests, and they are following the same laws. About 100.000 hectares of public forests in <u>Wallonia</u> 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. 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 clean drinking water catchments and protection of water quality. Belgium is following European laws on drinking water. These are converted to <u>regional</u> 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. 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. Every forest and landowners 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 sound laws and regulations. Therefore, if a BP company is following the normal law and regulations they will comply with this indicator and the risk will be low. Based on the we conclude that all of Belgium is considered low risk.
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 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 ☐ Specified Risk ☐ Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.2.7	The Biomass Producer has implemented appropriate control systems and procedures for verifying that air quality is not adversely affected by forest management activities.
Finding	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. Furthermore, forestry operations are typically carried out in areas some distance to towns and cities. 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 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	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 ☐ Specified Risk ☐ Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.2.8	The Biomass Producer has implemented appropriate control systems and procedures for verifying that there is controlled and appropriate use of chemicals, and that Integrated Pest Management (IPM) is implemented wherever possible in forest management activities (CPET S5c).
Finding	In Belgium it is not allowed to use pesticides in forestry, following the regulations. 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 economicdamage 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. When Bimatra is buying from forest owners this indicator becomes applicable. Following Belgium law and regulations 'extremely dangerous and dangerous' pesticides (as classified by WHO) cannot be used. As Bimatra is also FSC certified they also have to follow the the FSC Pesticides Policy (1-5-2019). CNRA indicator 1.10 says something about environmental requirements. General restrictions to harvesting are mentioned in the forest-related legislation (Forest Decree / Forest Code). Further terms and conditions for forest harvesting are specified in the sales catalogue ('houtcataloog' / 'cahier des charges') for sales of wood in public forests and in some (large) private forests. Environmental restrictions shall be followed in the field, such as requirements related to soil damage, buffer zones, retention trees, seasonal restrictions (e.g. harvesting operations must not take place from 1 April to 30 June (during the period of nesting for birds applicable both in Flanders and Wallonia). Flanders: - Principles of environmental policy in Flanders are the precautionary principle, the stand-still principle, high level of protection, (source-oriented) prevention of damage to the environment, and the principle that 'the polluter pays' (for the cost of the damage to the environment). - There are detailed regulations for protection of sites and species. Wallonia: Environmental requirements are included in the Forest Code and in the terms and conditions for exploitation in public forests ('cahier des charges'). Elsewhere, including in private forests, environmental regulations are in effect. 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'). A large percentage of forests is owned by the government (particularly in Wallonia) and nature conservation societies (aiming at services to society rather than revenues from harvesting). 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. Since it is both punishable and also anti-economic for forest owners, the risk of legal infringements is considered low.
Means of Verification	• Existing legislation • Level of enforcement • Assessment, at an operational level, of measures designed to minimise impacts

	Interviews with staff
Evidence Reviewed	Belgian action plan to reduce the risks and impacts linked to pesticides. 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 ☐ Specified Risk ☐ Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.2.9	The Biomass Producer has implemented appropriate control systems and procedures for verifying that methods of waste disposal minimise negative impacts on forest ecosystems (CPET S5d).
Finding	There are no significant impacts – from forest management activities or other forest owner mandated activities – due to waste disposal in forests under any type of ownership in Belgium. Littering and illegal waste disposal in Belgium do occur along roads, parking spaces and recreational facilities near forests, especially where these occur close to cities and recreational sites that are often visited by forest guests. Whenever possible, the source of the waste is identified and police notified. The federal government is also responsible for the <u>coordination of international environmental policy</u>. Environmental issues that require cooperation between the Regions and the Federal government are dealt with by the Inter-Ministerial Conference for the Environment (ICE), formed of representatives of ministers for environment in the regions and at the federal level. For implementing the environmental policy, the Federal government consults with business federations, unions and specialised non-governmental organisations. This <u>consultation</u> is organised by topic or by file. Other forms of cooperation have been established especially with business federations in the framework of <u>sectoral agreements</u>. If a BP company is following the normal law and regulations they will comply with this indicator and the risk will be low. The risk of negative impacts from waste disposal in forest is assessed to be minimum.
Means of Verification	- Existing legislation - Level of enforcement - Regional Best Management Practices Operational assessment of potential impacts and of measures to minimise impact

Evidence Reviewed	Natuur & Bos, Flanders law enforcement http://www.natuurenbos.be/beleid-wetgeving/natuurinspectie/handhavingsrapport <u>Cooperation agreement</u> 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 ☐ Specified Risk ☐ Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.3.1	Analysis shows that feedstock harvesting does not exceed the long-term production capacity of the forest, avoids significant negative impacts on forest productivity and ensures long-term economic viability. Harvest levels are justified by inventory and growth data.
Finding	The 3 Regional Forest Acts gives basic protection from overexploitation of the forests covered by the Act. They also stipulate the need for forest management plans where such is further calculated. 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. This says something about the quality of the forest (not over-harvested). In case of overharvesting there cannot be an increase of forests and growing stock. The official definition of forest in Flanders is: ‘forests are land areas where trees and woody shrub vegetation are the main elements, with its own flora and fauna and fulfilling one or more functions’ (Forest decree/law 1990). The official definition of forest in Wallonia is: ‘These are lands of woods and forests such as areas covered by natural habitats, wood deposits, fauna feeding places, marshes, ponds and firebreaks.’ (Code forestier 2008). Risk Conclusion: Based on the above information, the risk for this Indicator has been assessed as Low.
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&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 ☐ Specified Risk ☐ Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.3.2	Adequate training is provided for all personnel, including employees and contractors (CPET S6d).
Finding	Generally, 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. Check their training records to know more. Risk Conclusion: 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, training records, 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-mana/ https://www.bosplus.be/nl/educatieve-projecten/green-learning-environments-eng https://www.natuurenbos.be/over-het-anb/inverde/natuuropleidingen
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.3.3	Analysis shows that feedstock harvesting and biomass production positively contribute to the local economy, including employment.
Finding	There are indicators showing that biomass production contribute positively to Local economy for forest owners, entrepreneurs based regionally or in Belgium and the regional and national transport sector. 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 moderately to the financial outcome of harvesting and thinning 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 where logging takes place. The biomass is transported regionally over relatively short distances. International studies (see below) show the same.

	Risk Conclusion: Based on the reviewed evidence, it is concluded that there is a low risk.
Means of Verification	Interviews BP sector staff and employees.
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 ☐ Specified Risk ☐ Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.4.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that the health, vitality and other services provided by forest ecosystems are maintained or improved (CPET S7a).
Finding	For the situation of 'water services', see also indicator 2.2.6, which is low risk. The biomass that Bimatra produces comes from regulated cuts (even in roadside or channel woodlands), in which there is a mandatory amount of trees to be left (even identified 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) are stating 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 stipulate the need for forest management plans where such is further calculated. 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. This says something about the quality of the forest (and health). In case of overharvesting there cannot be an increase of forests and growing stock. There are more international sources (like Natura2000 and CBD report) that show the 'health' of the environment. These reports are not 100% positive (and they are not positive in ALL EU countries), and the main threats are NOT biomass production in a sustainable

	way. The main threats are: 'Land conversion: -whether for urban and industrial expansion, agriculture, infrastructure or tourism- is undoubtedly the main cause in Belgium. It results in the loss, degradation or fragmentation of habitats, and currently affects all habitat types.' Other mentioned threats to HCVs in general are Pollution, Recreational pressure, Invasive species and Climate change. If a BP company is following the normal law and regulations they will comply with this indicator and the risk will be low Risk Conclusion: low risk.
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.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, 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 ☐ Specified Risk ☐ Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.4.2	The Biomass Producer has implemented appropriate control systems and procedures for verifying that natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b).
Finding	See also 2.2.8 for Integrated Pest Management (IPM), which is low risk. The 3 regional Forest Acts requires that forest owners maintain forest cover on forest land, as well as establishing 'healthy forests' with high level of resistance and resilience towards

	known calamities such as pests, wind and climate change. Generally, 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 is storm that 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. It is to be expected that new pests and diseases will come up in the future more often due to climate change (like the paardenkastanjenmineer-mot (<i>Cameraria ohridella</i>) and the Ash killed by <i>Chalara fraxinea</i>). But as long as forest workers are able to recognize that something is wrong the system is in place to take action. Risk Conclusion: 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//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&param=inhoud&ref=search&AVIDS=
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.4.3	The Biomass Producer has implemented appropriate control systems and procedures for verifying that there is adequate protection of the forest from unauthorised activities, such as illegal logging, mining and encroachment (CPETS7c).
Finding	The CNRA category 1 is about Illegally harvested wood. There are 21 indicators and they are all low risk. We will not repeat all 21 indicators here but it is clear that on a country level legally 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 sufficient. 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 these last (annual) reports nothing special can be found. Cases are few and small. Mining and encroachment does not happen in Belgium as all borders and clearly known (in the online cadastre system) and forest guards are present. There are reports of infringements, e.g. the illegal killing of protected birds of prey (refer to ANB Handhavingsrapport 2013). It is still possible that timber is (knowingly or unknowingly) harvested from a place where it is not allowed (e.g. due to the presence of endangered species). The extent/scale of harvesting operations in Belgium is generally limited (e.g. only small-scale clearcutting). A large percentage of forests is owned by the government (particularly in Wallonia) and nature conservation societies (aiming at services to society rather than revenues from harvesting). Nature conservation societies and civilians have a pro-active approach and infringements can be (and are) reported to the forest and nature administration, which carries out inspections in the field. It is impossible that deforestation goes unnoticed in this densely populated country like Belgium. The level of law enforcement is sufficient, with a reasonable capacity of forest guards and inspectors. Notifications of deforestation (either 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. Notifications lead to effective actions in cases of (illegal) deforestation. 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). International sources does not state things otherwise. If a BP company is following the normal law and regulations they will comply with this indicator and the risk will be low. Altogether this can be judged as low risk.
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 ☐ Specified Risk ☐ Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.5.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that legal, customary and traditional tenure and use rights of indigenous people and local communities related to the forest are identified, documented and respected (CPET S9).
Finding	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 (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 then considered low risk in Belgium. Nevertheless Bimatra Contractors Manual explains that <i>'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.'</i>
Means of Verification	<u>Belgium:</u> - 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 ☐ Specified Risk ☐ Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.5.2	The Biomass Producer has implemented appropriate control systems and procedures for verifying that production of feedstock does not endanger food, water supply or subsistence means of communities, where the use of this specific feedstock or water is essential for the fulfilment of basic needs.
Finding	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 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. Forests acting as clean drinking water catchments and protection of water quality. Belgium is following European laws on drinking water. These are converted to <u>regional</u> 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. 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. Normal forest management. Small scale landscape elements like poplar or willows along roads or canals, or vegetation in small urban parks, or private gardens <u>are not considered to be forest</u> according to the forest definitions in Belgium. Every forest and landowners 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 sound laws and regulations. Therefore, if a BP company is following the normal law and regulations they will comply with this indicator and the risk will be low. Based on the above we conclude that all of Belgium is considered low risk.
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 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 ☐ Specified Risk ☐ Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.6.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that appropriate mechanisms are in place for resolving grievances and disputes, including those relating to tenure and use rights, to forest management practices and to work conditions.
Finding	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 BP company is following the normal law and regulations they will comply with this indicator and the risk will be low. Besides all this Bimatra is FSC & PEFC certified and such is thus also partly addressed by the certification system. Risk conclusion: low risk
Means of Verification	- Existing legislation - Level of enforcement - Regional Best Management Practices Supply contracts
Evidence Reviewed	FSC & PEFC documentation Bimatra. Regional legislation (not all listed here, as they are many).
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.7.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that Freedom of Association and the effective recognition of the right to collective bargaining are respected.
Finding	Such is covered under CNRA indicator 2.2. The main conclusion of this indicator is: <i>"Rights like freedom of association and collective bargaining are upheld."</i> 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: <i>'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 law (forest law per region) such rights/interests/identities, mostly on access and forest use are clearly described and respected.'</i> 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 There are no international sources stating things differently. If a BP company is following the normal law and regulations they will comply with this indicator and the risk will be low.
Means of Verification	• ILO conventions and documents. • Existing legislation 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 ☐ Specified Risk ☐ Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.7.2	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not supplied using any form of compulsory labour.
Finding	Such is covered under CNRA indicator 2.2. The main conclusion of this indicator is: “ <i>There is evidence confirming absence of compulsory and/or forced labour.</i>” 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: ‘<i>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</i>

	<i>general. The working group is also strongly convinced that these mechanisms prove to be sufficiently efficient. Also in forest law (forest law per region) such rights/interests/identities, mostly on access and forest use are clearly described and respected."</i> There are no international source stating things differently. If a BP company is following the normal law and regulations they will comply with this indicator and the risk will be low.
Means of Verification	• ILO conventions and documents. • Existing legislation 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 ☐ Specified Risk ☐ Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.7.3	The Biomass Producer 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: “ <i>There is evidence confirming absence of child labour..</i>” 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: <i>‘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 law (forest law per region) such rights/interests/identities, mostly on access and forest use are clearly described and respected.’</i> 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/ipec/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. There are no other international sources stating things differently. If a BP company is following the normal law and regulations they will comply with this indicator and the risk will be low.
Means of Verification	• ILO conventions and documents. • Existing legislation 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 ☐ Specified Risk ☐ Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.7.4	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not supplied using labour which is discriminated against in respect of employment and occupation.
Finding	Such is covered under CNRA indicator 2.2. The main conclusion of this indicator is: “ <i>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.</i>” And “<i>there is evidence that all groups (including women) feel adequately protected related to the labour rights</i>”. 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 law (forest law 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: <i>"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</i> <i>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 that are not necessary."</i> (p. 501) All of the above means that discrimination with regards to labour is happening, like in all other EU countries. Nevertheless all laws and regulations are in place to prevent this. If a BP company is following the normal law and regulations they will comply with this indicator and the risk will be low.
Means of Verification	• ILO conventions and documents. • Existing legislation 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 ☐ Specified Risk ☐ Unspecified Risk at RA
Comment or Mitigation Measure	It is advised to take care when employment procedures are starting because new employees are needed. The BP should not discriminate and offer equal chances to all possible groups in Belgium.

	Indicator
2.7.5	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is supplied using labour where the pay and employment conditions are fair and meet, or exceed, minimum requirements.
Finding	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. Most employees can be found with the large forest owners and harvesting companies, including government institutions and nature conservation organizations. 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 instead of unskilled workers. Isolated cases of infringements can never be excluded. The FSC Belgium working groups on Controlled Wood are stating that: <i>'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'</i>.

	Belgium has a high ranking of 89.9% (2013) in regards to "rule of Law" under the World banks Worldwide Governance Indicator. 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) and has a CPI of 75 in 2018 (Above the threshold of 50). There are no indications of violation of ILO fundamental Principles and Rights at work. If a BP 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, publicly available data from a credible third party Publicly available information (news and media)
Evidence Reviewed	CNRA Belgium https://fsc.org/en/document-centre/documents/resource/397 <i>International agreements:</i> 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:: <i>Belgium:</i> - 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) <i>Flanders:</i> - 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 <i>International:</i> http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO::P11200_COUNTRY_ID:102560 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 Legally required documents or records Belgium: - Register of personnel (or electronic 'dimona' declaration) - The individual account and payslip - Work contracts, including agreements for flexible employment or employment as student or apprentice - Foreign workers (not citizens of countries of the European Economic Area and Switzerland) need a work permit ('arbeidskaart' / 'permis de travail'). - If there is a Collective Labour Agreement, the employer shall adhere to the regulations stipulated therein. - All social security contributions ('Rijksdienst voor Sociale Zekerheid' / 'Office Nationale de Sécurité Sociale') shall be paid - via the tax office. - The buyer of wood from public forests shall identify the company/individuals carrying out the harvesting operations. For harvesting in military areas, an attendance register is required.		
Risk Rating	☒ Low Risk	☐ Specified Risk	☐ Unspecified Risk at RA
Comment or Mitigation Measure			

	Indicator
2.8.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12).
Finding	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. All safety and health regulations shall be followed and all required safety equipment shall be used - Occupational health and safety requirements shall be observed by all personal involved in harvesting activities.

	- Interviews with staff and contractors shall confirm that legally required protection equipment is required/provided by the organization. - All requirements on prevention of air and water pollution shall be followed and are verified through reports monitoring pollution (when applicable) Most employees can be found with the large forest owners and harvesting companies, including government institutions and nature conservation organizations. 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 instead of unskilled workers. In general there is a relatively 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. There may be cases where this obligation is not respected. However, in general accidents occurring in Belgian forestry are not related to violation of the law (they are mostly real accidents). In general the risk is also low because employees in Belgium are aware of their rights and of the legislation related to health and safety. 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) and has a CPI of 75 in 2018 (Above the threshold of 50). While isolated cases of infringements can never be excluded, 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. Hence, the risk is considered low. If a BP company is following the normal law and regulations they will comply with this indicator and the risk will be low. Hence, the risk is considered low.
Means of Verification	- Existing legislation - Level of enforcement - Regional, publicly available data from a credible third party - Publicly available information (news and media) Inspections in the field.
Evidence Reviewed	CNRA Belgium https://fsc.org/en/document-centre/documents/resource/397 <i>International agreements:</i> As an ILO member, Belgium has ratified all fundamental and governance conventions and about half of the technical conventions. http://www.ilo.org www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11110:0::NO::P11110_COUNTRY_ID:102560 http://webfusion.ilo.org/public/applis/appl-byCtry.cfm?lang=EN&CTYCHOICE=0070 <i>Belgium:</i> - Law of 4 August 1996 on well-being of workers in the performance of their work - Relevant Royal Decrees, as summarized in the 'Codex on well-being at work' (2012) - General regulations on the protection of workers, 1947 (partly abrogated)

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>

http://www.belgium.be/nl/werk/gezondheid_en_welzijn/ (in Dutch)

<http://www.employment.belgium.be/WorkArea/linkit.aspx?LinkIdentifier=id&ItemID=1896>

http://www.emploi.belgique.be/detailA_Z.aspx?id=916

Codex on well-being at work (version June 2012), available online at:

<http://www.werk.belgie.be/moduleDefault.aspx?id=1958#> (in Dutch)

<http://www.emploi.belgique.be/moduleDefault.aspx?id=1958> (in French)

Annual Report 2011 of the General Direction Supervision on Well-Being At Work (Labour Inspection), available online at:

<http://www.werk.belgie.be/WorkArea/DownloadAsset.aspx?id=31974&LangType=2067> (in Dutch)

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 erkenning exploitanten 2002 (on recognition of companies harvesting wood in the forest)

<http://www.natuurenbos.be/nl> -

BE/natuurbeleid/bos/wetgeving_en_vergunning/erkenning_exploitanten

Wallonia:

- Cahier des charges pour la vente des coupes de bois dans les forêts de la Région wallonne (Forêts domaniales) et dans les forêts des administrations subordonnées, particularly chapter IX, article 48 on prevention of accidents at work during forest exploitation in public forests owned by the Walloon Region and other administrations, which refers to the regulations on protection of workers ('Règlement général sur la Protection du Travail')

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)

Legally required documents or records

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

Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.9.1	Biomass is not sourced from areas that had high carbon stocks in January 2008 and no longer have those high carbon stocks.
Finding	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, not lowered. Currently there is no evidence that forestry practice has an impact on any remaining, important large scale forests. Forest operations are planned and implemented in accordance with the requirements in the Forest Acts which require protection of wetlands and peatlands. As 2.2.2 stated some biomass (small trees & shrubs) in small quantities could be extracted by such fragile areas only in case this is needed to preserve the habitats. As all such places are protected by Natura2000 this happens only in exceptional cases and in strict accordance to specific projects which guarantee, among other aspects, protection of carbon stock. Risk conclusion: low risk
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/envuib4ka/index_html?&page=2 Convention on Biological Diversity (CBD), Country profile. https://www.cbd.int/countries/?country=ie
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.9.2	Analysis demonstrates that feedstock harvesting does not diminish the capability of the forest to act as an effective sink or store of carbon over the long term.
Finding	The 3 Regional Forest Acts gives basic protection from overexploitation of the forests covered by the Act. They also stipulate the need for forest management plans where such is further calculated. 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. This says something about the quality of the forest (not over-harvested and storing more carbon overtime). In case of overharvesting there cannot be an increase of forests and growing stock. Normal forest management. Every forest and landowners has to follow the normal Belgian laws and regulations. Sustainable forestry is common practise because there are sound laws and regulations. Therefore, if a BP company is following the normal law and regulations they will comply with this indicator and the risk will be low. Small scale landscape elements like poplar or willows along roads or canals, or vegetation in small urban parks, or private gardens <u>are not considered to be forest</u> according to the forest definitions in Belgium. Bimatra is also certified with FSC and PEFC thus the same values (and strict 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&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.enviroennement.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 ☐ Specified Risk ☐ Unspecified Risk at RA
Comment or Mitigation Measure	

	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/ <i>European Union:</i> 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 <i>Belgium:</i> 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 ☐ Specified Risk ☐ Unspecified Risk at RA
Comment or Mitigation Measure	