# Supply Base Report:

## 2Valorise NV
## Second Surveillance Audit

**Sustainable Biomass Program**
sbp-cert.org



## Completed in accordance with the Supply Base Report Template Version 2.2 and SBP Bridging Requirements for Meeting the Directive EU/2023/2413 (REDIII)

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

### Document history

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|---|---|
| **Version 1.0** | **Published 26 March 2015** |
| **Version 2.0** | Published 10 August 2023 |
| **Version 2.1** | Published 15 April 2024 |
| **Version 2.2** | Published 21 May 2025 |
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# 1 Overview

| | |
|---|---|
| **Producer name:** | 2Valorise NV |
| **Producer address:** | De Snep 3324, 3945 Ham, Belgium |
| **SBP Certificate Code:** | SBP-08-92 |
| **Geographic position:** | 51.080020, 5.160280 |
| **Primary contact:** | Marilyne Brodel,<br>+32 499 058 146,<br>marilyne.brodel@2valorise.be |
| **Company website:** | http://www.2valorise.be/ |
| **Date report finalised:** | 10 Sep 2025 |
| **SBR reporting period from:** | 19 Aug 2025 |
| **SBR reporting period to:** | 18 Aug 2026 |
| **Name of the Certification Body:** | Preferred by Nature OÜ |
| **Certification Body Approval date:** | 06 Nov 2025 |
| **SBP Standard(s) used:** | SBP Standard 2: Feedstock Verification v2.0, SBP Standard 4: Chain of Custody v2.0, SBP Standard 5: Collection and Communication of Data v2.0, Instruction Document 5E: Collection and Communication of Energy and Carbon Data v2.0, Instruction Document EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413 |
| **Feedstock origin (countries)** | Belgium (-), France (European area), Germany (-), Luxembourg (-), Netherlands (European aera) |
| **Weblink to Standard(s) used:** | https://sbp-cert.org/documents/standards-documents/standards |

# 2 Description of the Biomass Producer and the Supply Base

## 2.1 Description of the company

2Valorise has for more than 15-years in-depth experience in the production of green energy from woody biomass: mainly organic (woody) waste from composting facilities, in combination with forest residues (chipped branches and tree tops coming from forestry sites), and wood residues from sawmills and pellet plants (bark and shavings). 2Valorise NV is exclusively in charge of the purchase and supply of the material for its two daughter companies, 2Valorise Ham and 2Valorise Amel. The two daughter companies are the end-users of the supply chain. 2Valorise Amel operates two cogeneration plants on its site whilst 2Valorise Ham operates only one. Both sites have similar production capacities (34-40 MWth and 9,6-11,2 MWe). 2Valorise NV sources its primary and processing residues biomass locally (mainly Belgium, in combination with Germany, France, Netherlands, and Luxembourg). It has around 100 suppliers. 2Valorise NV has a turnover in biomass that is probably larger than most comparable companies in Belgium, but nonetheless there are several companies, which process even more, such as paper mills and a large Belgian pellet plant. 50-60% of the biomass 2Valorise NV produces, originates from SBP-controlled primary feedstock and 50-40% from SBP-controlled processing residues biomass. Considering our raw materials and supply chain, very seldom the volumes could be offered with an FSC or PEFC certified claim. Of main importance to our business is proving EU RED-compliant.

**Products included in the scope of SBP Certification:** *WB 2.1 Wood chips*
**Number of employees:** *3*
**Annual maximum production capacity (metric tonnes):** *275000*
**Number of direct feedstock suppliers:** *100*
**Approximate number of feedstock sub-suppliers:** *0*

**Description of the chain-of-custody and upstream supply chain**:

2Valorise has around 100 suppliers in the biomass sector, most of which are located in, and source from, Belgium. Approximately the half of these suppliers provide primary material, including two engaged in maintaining roadsides and other infrastructure areas. The other half of the suppliers supply processing residues, most of which are composting facilities and a few coming from sawmills.
All the deliveries are made directly to customers, there is no storage location.

## 2.2 Detailed description of the Supply Base

*Guidance: Tables below have been generated automatically for each sourcing country based on the selection of 'Feedstock origin (countries)' in section 1 above.*

*Annex 1 is generated by the system if the SBP SBE is used without Regional Risk Assessment(s) (RRAs). In case RRA(s) is used, further details shall be given only in section 3 below.*

*Annex 2 is generated if EU RED SBE is in the scope for each country separately.*

| | |
|---|---|
| **Country** | Belgium |
| **Area/Region** | - |
| **Exclusions** | |
| **Feedstock types** | Primary feedstock, Processing residues, Post-consumer |

| | |
|---|---|
| **Feedstock Product Groups** | Forest feedstock (1A), Trees outside forest (TOF) - Urban and landscape feedstock (2A), Processing residues feedstock (4A), Post-consumer feedstock (5A) |
| **Feedstock inputs** | SBP Compliant feedstock , SBP Controlled feedstock |
| **Is the forest managed to supply energy and non-energy markets?** | No |
| **For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?** | Yes - Majority |
| **Risk assessment(s)** | N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme, N/A - Post-consumer feedstock |
| **Provide a concise summary of why a SBE was determined to be required or not required here:** | |
| Will be considered in due time. | |
| **Feedstock types included in SBE:** | N/A |
| **Includes EU RED SBE:** | Yes |
| **Includes EU RED II SBE grandfathering** | No |
| **Includes EU RED TOF:** | Yes |
| **Includes EU RED II TOF grandfathering** | No |
| **Size of Supply Base area (million ha):** | 3.0528 |
| **Map(s) of the Supply Base area:** | |




| | |
|---|---|
| **Country** | France |
| **Area/Region** | European area |
| **Exclusions** | |
| **Feedstock types** | Primary feedstock, Processing residues |
| **Feedstock Product Groups** | Forest feedstock (1A), Processing residues feedstock (4A) |
| **Feedstock inputs** | SBP Compliant feedstock , SBP Controlled feedstock |
| **Is the forest managed to supply energy and non-energy markets?** | No |
| **For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?** | Yes - Majority |
| **Risk assessment(s)** | N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme |
| **Provide a concise summary of why a SBE was determined to be required or not required here:** | |

| | |
|---|---|
| Will be considered in due time. | |
| **Feedstock types included in SBE:** | Primary feedstock, Processing residues |
| **Includes EU RED SBE:** | Yes |
| **Includes EU RED II SBE grandfathering** | No |
| **Includes EU RED TOF:** | No |
| **Includes EU RED II TOF grandfathering** | No |
| **Size of Supply Base area (million ha):** | 55.1695 |
| **Map(s) of the Supply Base area:** | |



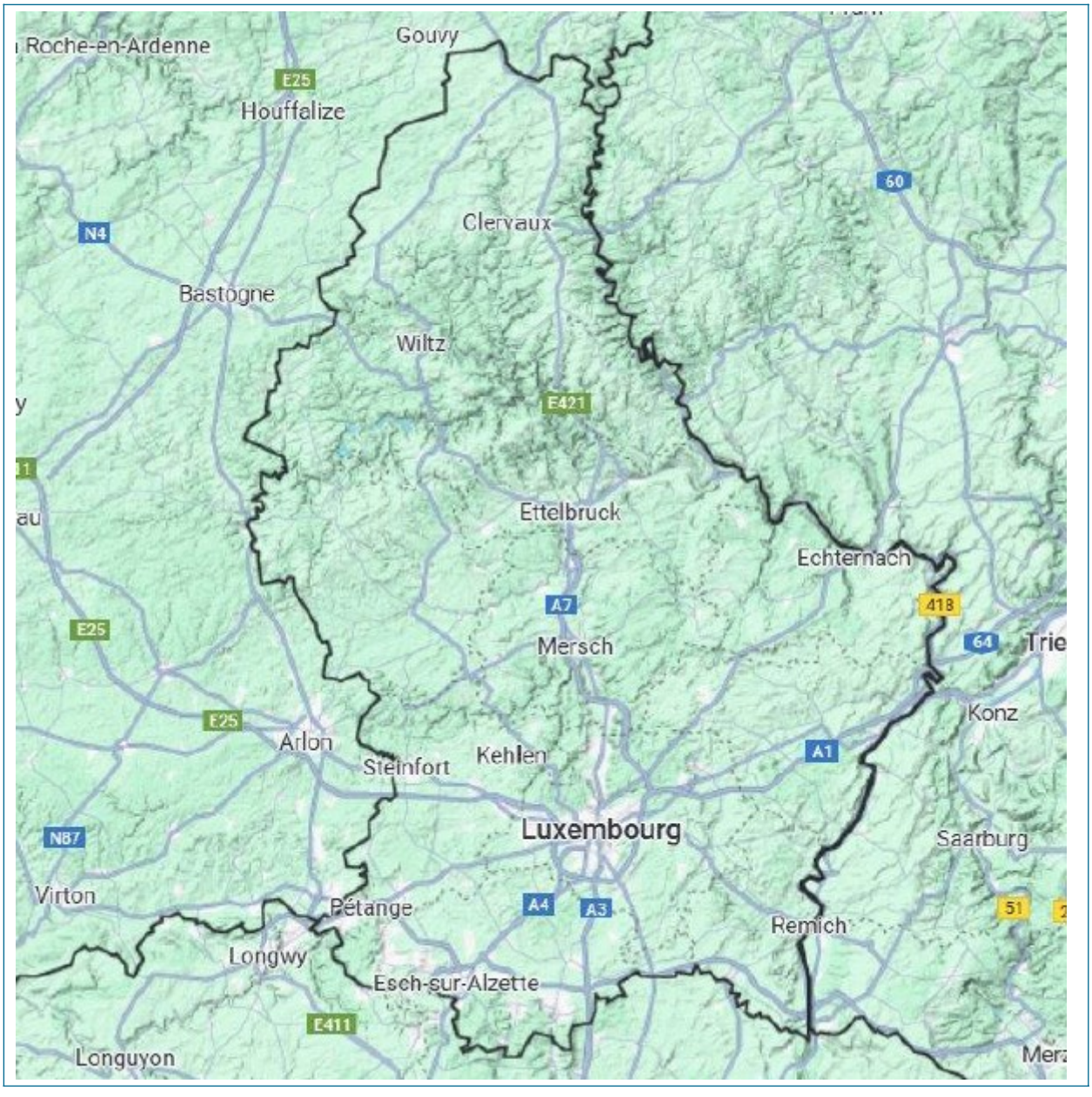

| | |
|---|---|
| **Country** | Germany |
| **Area/Region** | - |
| **Exclusions** | |
| **Feedstock types** | Primary feedstock, Processing residues |
| **Feedstock Product Groups** | Forest feedstock (1A), Processing residues feedstock (4A) |
| **Feedstock inputs** | SBP Compliant feedstock , SBP Controlled feedstock |
| **Is the forest managed to supply energy and non-energy markets?** | No |

| | |
|---|---|
| **For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?** | Yes - Majority |
| **Risk assessment(s)** | N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme |
| **Provide a concise summary of why a SBE was determined to be required or not required here:** | |
| Insufficient market demand for SBP-compliant biomass. Troublesome forest inventory results for Germany. | |
| **Feedstock types included in SBE:** | N/A |
| **Includes EU RED SBE:** | No |
| **Includes EU RED II SBE grandfathering** | No |
| **Includes EU RED TOF:** | No |
| **Includes EU RED II TOF grandfathering** | No |
| **Size of Supply Base area (million ha):** | 35.7576 |
| **Map(s) of the Supply Base area:** | |




| | |
|---|---|
| **Country** | Luxembourg |
| **Area/Region** | - |
| **Exclusions** | |
| **Feedstock types** | Primary feedstock |
| **Feedstock Product Groups** | Forest feedstock (1A) |

| | |
|---|---|
| **Feedstock inputs** | SBP Compliant feedstock , SBP Controlled feedstock |
| **Is the forest managed to supply energy and non-energy markets?** | No |
| **For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?** | Yes - Majority |
| **Risk assessment(s)** | N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme |
| **Provide a concise summary of why a SBE was determined to be required or not required here:** | |
| Will be considered in due time. | |
| **Feedstock types included in SBE:** | N/A |
| **Includes EU RED SBE:** | No |
| **Includes EU RED II SBE grandfathering** | No |
| **Includes EU RED TOF:** | No |
| **Includes EU RED II TOF grandfathering** | No |
| **Size of Supply Base area (million ha):** | 0.2586 |
| **Map(s) of the Supply Base area:** | |




| | |
|---|---|
| **Country** | Netherlands |
| **Area/Region** | European aera |
| **Exclusions** | |
| **Feedstock types** | Primary feedstock, Processing residues |
| **Feedstock Product Groups** | Forest feedstock (1A), Processing residues feedstock (4A) |
| **Feedstock inputs** | SBP Compliant feedstock , SBP Controlled feedstock |
| **Is the forest managed to supply energy and non-energy markets?** | No |

| | |
|---|---|
| **For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?** | Yes - Majority |
| **Risk assessment(s)** | N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme |
| **Provide a concise summary of why a SBE was determined to be required or not required here:** | |
| Biomass supply is too low. | |
| **Feedstock types included in SBE:** | N/A |
| **Includes EU RED SBE:** | No |
| **Includes EU RED II SBE grandfathering** | No |
| **Includes EU RED TOF:** | No |
| **Includes EU RED II TOF grandfathering** | No |
| **Size of Supply Base area (million ha):** | 4.1543 |
| **Map(s) of the Supply Base area:** | |


Groningen
Leeuwarden
Harlingen
Drachten
Sneek
Heerenveen
Den Helder
Emmen
Hoogeveen
Alkmaar
Hoorn
Purmerend
Lelystad
Zwolle
Haarlem
Amsterdam
Harderwijk
Almelo
Hilversum
Deventer
Apeldoorn
Leiden
Amersfoort
Utrecht
The Hague
Delft
Gouda
Arnhem
Rotterdam
Dordrecht
Nijmegen
Kleve
's-Hertogenbosch
Breda
Tilburg
Roosendaal
Middelburg
Helmond
Eindhoven
Duisburg
Venlo
Antwerp
Sint-Niklaas
Roermond
Ghent
Mechelen
Aalst
Genk
Brussels
Maastricht
Aachen
Düren

## 2.3 Feedstock information

**a. Total volume of Feedstock:** 1-200,000 tonnes

**b. Volume of primary feedstock:** 1-200,000 tonnes

**c. List of all the species in primary feedstock, including scientific name:**

| | |
|---|---|
| Abies spp | Fir |
| Acer spp. | Maple |
| Alnus spp | Alder |
| Betula spp | Birch |
| Carpinus betulus | Hornbeam |
| Carya spp | Hickory |
| Castanea sativa | Wild chestnut |
| Cedrus atlantica | Atlas cedar |
| Chamaecyparis spp | False cypress |
| Fagus sylvatica | European beech |
| Fraxinus spp | Ash |
| Juglans spp | Walnut |
| Larix spp | Larch |
| Liriodendron tulipifera | Tulip tree |
| Malus sylvestris | European crab apple |
| Picea spp | Spruce |
| Pinus spp | Pine |
| Populus spp | Poplar |
| Prunus avium | Wild cherry |
| Prunus serotina | Black cherry |
| Pseudotsuga menziesii | Douglas |
| Quercus spp | Oak |
| Robinia pseudoacacia | Black locust |
| Salix alba | Willow |
| Sorbus aucuparia | Mountain Ash |

| | |
|---|---|
| Sorbus torminalis | Wild service tree |
| Thuja plicata | Western redcedar |
| Tilia spp | Linden |
| Tsuga heterophylla | Western hemlock |
| Ulmus minor | Field Elm |

**d. Was the feedstock used in the biomass removed from a forest as part of a pest/disease control measure or a salvage operation?** No

**Explanation:**

**e. Hardwood (i.e. broadleaf trees): specify proportion of feedstock from (%)**: 40.00

**f. Softwood (i.e. coniferous trees): specify proportion of feedstock from (%):** 60.00

**g. Proportion of feedstock composed of or derived from saw logs by weight (%):** 0.00

**h. Indicate how you determine the proportion of saw log:** Specification used by the sawmill closest to where the wood was grown.

**i. Roundwood from fellings from forests with > 40 yr rotation times - Average % volume of fellings delivered to BP (%):** 10.00

**j. Select forest type(s) where the primary feedstock was sourced from:** Mix of The Above

**k. Select the main harvesting system(s) used for the sourced primary feedstock:** Mix of the above

**l. Volume of primary feedstock from primary forest:** 0

**m. Volume of processing residues feedstock:** 1-200,000 tonnes
**Physical form of the feedstock:** Chips, Sawdust, Offcuts

**n. Share of SBP-recognised system claim for processing residues:**

100.00 % PEFC

**o. Volume of post-consumer feedstock:** 0
**Physical form of the feedstock:** Chips, Sawdust, Offcuts

**p. Estimated amount of EU RED-compliant sustainable feedstock that could be collected annually by the BP:** 100000 tonnes

**q. What is the estimated amount of EU RED-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated):** 25000000.00 tonnes

**Explanation**: to the latest FAO data (2023), over 25 million tons of wood fuel were produced in Belgium and France. EU RED Level B reports are available for Wallonia, Flanders, and France (metropolitan).

# 3 Supply Base Risk Assessments and Risk Management Measures

*Guidance: Biomass Producers shall demonstrate that any specified risks of sourcing feedstock not in compliance with SBP Standard 1 have been adequately reduced to low risk, following Standard 2 requirements. Following section applies to Biomass Producer's implementing SBP Supply Base Evaluation (SBP RRA or company own risk assessment). EU RED Supply Base Evaluation details are reported in Annex 2.*

☒ **Not Applicable – Supply Base Evaluation not implemented**

## 3.1 Summary of the Supply Base Evaluation

## 3.2 Conflicts with applicable national and sub-national legislation

## 3.3 Risk Management Measures

*Guidance: Please provide more details about specified risk indicators in each supply country and describe mitigation measures taken to address all specified risks associated with indicators.*

# 4 Stakeholder engagement

## 4.1 General description

**Biomass Producer's stakeholder engagement start date:** 17 Jul 2025

**Biomass Producer's stakeholder engagement end date:** 17 Aug 2025

**Total number of stakeholders contacted:** 100

**Give a general description of the process of Stakeholders Engagement, including stakeholders contacted, method of communication and a summary of the comments received:**

Our company has engaged a wide range of stakeholders since its founding and continues to do so daily. Our Stakeholder Engagement Plan and Comments and Complaints Procedure are available upon request.
To date, no comments have been received, directly or indirectly, in relation to our SBP certification.
We use the EU RED Level B reports for France, Flanders, and Wallonia developed by BiomassConsult, which also conducted stakeholder consultation over several months in the summer of 2025.
During development, the assessments were discussed with numerous stakeholders and subsequently sent to an additional 46 stakeholders by email, including research organisations and NGOs (9), biomass consultants (5), biomass suppliers (21), end-users (9), and regional authorities (2). The results were publicly available on BiomassConsult's website for over a month. This additional consultation round yielded no comments.

## 4.2 Response to stakeholder comments

# 5 Report updates and approval

**This document is:** Updated SBR (surveillance audits/scope-change audits)

SBPv2 now applies, and the latest SBR template has been completed.
The REDII Level A reports for France and the Walloon Region do not fully address all EU RED requirements; therefore, EU RED Level B reports were added for these areas. In addition, a full EU RED Level B report was prepared for Flanders.

| | |
|---|---|
| **Name** | Marilyne Brodel |
| **Title** | Report author |
| **Date of report approval** | 10 Sep 2025 |

| | |
|---|---|
| **Name** | Rens Hartkamp |
| **Title** | Consultant |
| **Date of report approval** | 10 Sep 2025 |

| | |
|---|---|
| **Name** | Robin Vannoppen |
| **Title** | Management representative |
| **Date of report approval** | 10 Sep 2025 |

| | |
|---|---|
| **Name** | Filip Lesaffer |
| **Title** | Management representative |
| **Date of report approval** | 10 Sep 2025 |

# Annex 1: Detailed findings for Supply Base Evaluation indicators

## Annex 2: EU RED Supply Base Evaluation

| Countries where EU RED Supply Base Evaluation is used | |
|---|---|
| **Country** | Belgium |
| **Area** | - |
| **Sustainable harvesting criteria 29(6)** | |
| **(i) The legality of harvesting operations** | |
| **Type of Risk Assessment used** | ☐ Level A – proof at national or sub-national level<br>☒ Level B – management system at forest sourcing area level |
| **Level A risk assessment description** | N/A |
| **Level B management system at the level of the forest sourcing area** | Our company implements a due diligence system on all supplies and a monitoring system on all biomass suppliers. Information is gathered and risks are assessed related to the suppliers themselves, their supply bases, and their their supply chains. All suppliers sign Supplier Declarations, and are evaluated. Suppliers are visited and Supplier Evaluation reports are made. These evaluations include assessments of the operational performance (biomass sourcing).<br>The EU RED Level B report assessed Wallonia and Flanders.<br>- Considering Flanders, there are seldom legality concerns, however forest clearing without a permit rose in 2024, driven by a controversial legal loop that allows retroactive permits and avoids sanctions. Therefore specified risk applies to private forest owners, who are not affiliated with a forest group. To mitigate the risk the harvesting permit is demanded.<br>- Considering Wallonia, the REDII Level A report for Wallonia concluded Low Risk on this unchanged indicator. However, our company is aware that private forest owners in Wallonia often do not require a permit to conduct harvesting operations. If there is any doubt about the legality or sustainability of the operations, our company requests proof of submission of the official "notification".<br><br><u>Risk mitigation (general summary)</u><br>Suppliers provide the wood's origin (harvesting location) and proactively notify our company if they encounter key forest characteristics linked to specified risks.<br>Our company verifies the location using online mapping tools and databases, assessing the type of area and habitat, and checking whether the area was converted or degraded after 2007.<br>Desk research must confirm with certainty that the EU RED requirements are met. If there is any doubt, our team conducts a field inspection of the sourcing area and operations. We also carry out random inspections to check performance and best practices. |

| | |
|---|---|
| | No-go areas and biomass from sensitive sites that fail to meet EU RED sustainability requirements are excluded. All findings are systematically documented, including checklists, maps, permits, photographs, and notes. |
| **(ii) Forest regeneration of harvested areas** | |
| **Type of Risk Assessment used** | ☐ Level A – proof at national or sub-national level<br>☒ Level B – management system at forest sourcing area level |
| **Level A risk assessment description** | N/A |
| **Level B management system at the level of the forest sourcing area** | Our monitoring system covers all forest biomass supplies and includes supplier declarations, supplier evaluations, and harvesting plot assessments. The EU RED Level B report assessed Wallonia and Flanders.<br>In Flanders, reforestation is legally required under the Forest Decree and adequately enforced by the Nature and Forest Agency (ANB).<br>For Wallonia, the REDII Level A report rated this unchanged indicator as Low Risk, and our research this year did not find anything that calls that conclusion into question. |
| **(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grasslands, heathland and peatlands, are protected with the aim of preserving biodiversity and preventing habitat destruction, unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes** | |
| **Type of Risk Assessment used** | ☐ Level A – proof at national or sub-national level<br>☒ Level B – management system at forest sourcing area level |
| **Level A risk assessment description** | N/A |
| **Level B management system at the level of the forest sourcing area** | In both Wallonia and Flanders the risk of biomass harvesting interfering with the environmental goals of protected areas is low. The legal framework permits such activities only under strict conditions, requiring approved management plans and/or permits.<br>Operations in protection areas have been closely monitored for several years and, despite occasionally being poorly documented, they prove to contribute to the stated nature conservation goals. While BiomassConsult and some experienced biomass producers have concerns about outdated management plans, inaccuracies in standardised procedures, and weaknesses in official monitoring and reporting, the actual situation in practice is better than it appears to be on paper. |
| **(iv) that harvesting is carried out considering the maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth forests as defined in the country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located, and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with requirements to use logging systems that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and** | |

| | |
|---|---|
| **habitats** | |
| **Type of Risk Assessment used** | ☐ Level A – proof at national or sub-national level<br>☒ Level B – management system at forest sourcing area level |
| **Level A risk assessment description** | N/A |
| **Level B management system at the level of the forest sourcing area** | For both Wallonia and Flanders the risks of inaccurate and unsustainable biomass sourcing practices are low, nonetheless the EU RED requires that our company monitors the quality of forest operations onsite. Suppliers are assessed and categorised, and their harvesting teams are monitored accordingly: field inspections include document reviews, verifications of online maps and databases, site inspections, and interviews. The quality of operations in progress is evaluated, including deadwood retention levels, harvest impacts and measures safeguarding biodiversity and vulnerable soils (best practices). An elaborate checklist is filled in. All inspections and findings are documented, including supporting documents and photographs. |
| **(v) That harvesting maintains or improves the long-term production capacity of the forest.** | |
| **Type of Risk Assessment used** | ☐ Level A – proof at national or sub-national level<br>☒ Level B – management system at forest sourcing area level |
| **Level A risk assessment description** | N/A |
| **Level B management system at the level of the forest sourcing area** | In Flanders the risk on the long-term production capacity is low for all forest managers. Harvesting in the region requires approved plans or permits and is monitored by the ANB. About 70% of annual growth is harvested, forest stock is rising, and resilience is improving through a shift to mixed forests. Oversight is weaker on (unmanaged) private lands, but data indicate forest productivity is well maintained.<br>For Wallonia the REDII Level A report rated this unchanged indicator as Low Risk, and the research of BiomassConsult in 2025 did not find anything that calls that conclusion into question. |
| **(vi)[1] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.**<br>*Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:*<br>*(a) **primary forest** and other wooded land and **old growth forest,** namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located. If there is no definition of **old growth forest** at the national level, then the following definition shall apply: A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.* | |
| **Type of Risk Assessment used** | ☐Level A – proof at national or sub-national level<br>☒Level B – management system at forest sourcing area level |
| **Level A risk assessment description** | N/A |

| | |
|---|---|
| **Level B management system at the level of the forest sourcing area** | Regarding 29(3)a, there are no primary forests in Belgium. However, Old Growth Forests are present in these regions. They are excluded from biomass sourcing (No-Go area). There are several officially recognized Old Growth Forests in protected areas, but our monitoring system does not limit itself to these. All Old Growth Forests in any type of Forest are excluded from biomass sourcing. |
| **(vi)[2] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.**<br>*Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:*<br>*(b) **highly biodiverse forest** and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.* | |
| **Type of Risk Assessment used** | ☐Level A – proof at national or sub-national level<br>☒Level B – management system at forest sourcing area level |
| **Level A risk assessment description** | N/A |
| **Level B management system at the level of the forest sourcing area** | Belgian forests host high biodiversity, including protected species (for example the stag beetle, middle spotted woodpecker, and rare orchids). Functional forest corridors support landscape connectivity. High-value elements occur in reserves and in managed private stands. A substantial share is designated under Forest Europe (MCPFE) Classes 1–3: Class 1—strict biodiversity conservation with minimal or no harvesting; Class 2—management that preserves specified features; Class 3—management prioritising protective functions (soil and water) over production. Several Annex I forest habitat types are of high conservation value yet under pressure; they occur in protected areas and in ordinary forests where they may not be formally identified. A specified risk applies to these habitats and to forests containing their key elements on private land outside protected areas; management on private land within protected areas and in mapped priority zones pending designation are investigated in detail. Annex I forest habitat types of concern include: - Beech forests (9110–9130) - Oak(-hornbeam) forests (9160) - Ravine forests (9180) - Old acidophilous oak woods (9190) - Bog woodland (91D0) - Alluvial forests (91E0) - Riparian forests (91F0) - Wooded dunes (2180). Authorities have identified additional ecologically valuable forest areas not yet formally designated, these areas are often buffer zones, restoration areas (including LIFE projects), or Natura 2000 candidates. Any biomass sourcing in such areas is investigated. Any biomass sourcing from forests established after 2007 triggers the verification of the vegetation type in January 2008. |
| **(vi)[3] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.**<br>*Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:*<br>*(d) **highly biodiverse grassland** spanning more than one hectare that is: (i) natural, namely grassland that would remain* | |

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| *grassland in the absence of human intervention and that maintains the natural species composition and ecological characteristics and processes; or (ii) non-natural, namely grassland that would cease to be grassland in the absence of human intervention and that is species-rich and not degraded and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the harvesting of the raw material is necessary to preserve its status as highly biodiverse grassland.* | |
| **Type of Risk Assessment used** | ☐Level A – proof at national or sub-national level<br>☒Level B – management system at forest sourcing area level |
| **Level A risk assessment description** | N/A |
| **Level B management system at the level of the forest sourcing area** | In Belgium, there are no highly-biodiverse natural grasslands of over 1 ha; there are only a few plots of natural grasslands of under 1 ha, which are mapped and protected. Non-natural, highly-biodiverse grasslands can be protected under environmental schemes and Natura 2000. However, forest area in Belgium has been gradually increasing since 2007, partly due to grassland conversion; therefore, the Level B assessment concluded a specified risk for this vegetation type (mainly for privately owned land). Any biomass sourcing from forests established after 2007 triggers the verification of the vegetation type in January 2008. Signs of degradation of high biodiverse grasslands also excludes biomass sourcing. |
| **(vi)[4] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.**<br><br>*Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:*<br>*(e)* ***heathland*** *- Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).* | |
| **Type of Risk Assessment used** | ☐Level A – proof at national or sub-national level<br>☒Level B – management system at forest sourcing area level |
| **Level A risk assessment description** | N/A |
| **Level B management system at the level of the forest sourcing area** | Large areas and small patches of heathland are present across Flanders and Wallonia and excluded from biomass sourcing (No-Go area). Most of these areas are found in protected areas and parks (mainly in Flanders). Our company and our suppliers are trained to identify heathland. 99% of heathland area has been lost since the 18th century, leaving only small and scattered patches today. The remaining heathlands are highly fragmented, which reduces species richness and disrupts community structure. Nitrogen deposition adds further pressure by enriching the naturally nutrient-poor soils, leading to the decline of characteristic heathland plants. Research also shows that regeneration is hampered, with reduced seed viability and weakened establishment of |

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| | species such as common juniper. Heathlands in Belgium depend on active conservation management; both habitat loss and ecological pressures continue to threaten their long-term survival. Reported heathland area varies depending on whether dry and wet heath (habitats 4030/4010) and dune-heath mosaics are included. In Flanders, estimates range between 8,000 and 10,000 ha, while Wallonia contains only small and fragmented heath patches. |
| **(vi)[5] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.**<br>*Article 29 (4): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status: (a) **wetlands,** namely land that is covered with or saturated by water permanently or for a significant part of the year (NOTE: Evidence of verification of wetlands should reflect seasonal changes within a year).* | |
| **Type of Risk Assessment used** | ☐Level A – proof at national or sub-national level<br>☒Level B – management system at forest sourcing area level |
| **Level A risk assessment description** | N/A |
| **Level B management system at the level of the forest sourcing area** | Flanders (after 2007): independent assessments show ongoing wetland decline (2007–2012) driven by drainage, urbanisation/infrastructure, and pollution, but not due to afforestation. Policy-led restoration (for example, SIGMA floodplains, VMM Wetlands4Cities) has removed some floodplain plantations. Afforestation is screened via the natuurtoets; planting on wetlands is constrained. No findings that forestry has driven wetland conversion since 2007. Wallonia (after 2007): many wetland habitats remain in unfavourable status due to hydrological alteration, pollution, and development, but there are no new forest plantings. LIFE projects prioritise open-wetland restoration, including removal of conifers on peat. CAP conditionality (BCAE-2, 2023) adds explicit on-farm wetland protections. After 2007, conversion risks have decreased; but non-forestry conversions persist at a low level. Areas already converted to urban/infrastructure by 2025 are not a possible sourcing area anymore. Biomass sourcing on wetlands always trigger additional targeted biodiversity investigations to detect and address any deterioration of habitats. Any conversion plans will become apparent in the process. The risk of wetland conversion is low. However, our company remains vigilant. Any indication of wetland conversion is investigated. Where confirmed, biomass sourcing is excluded, unless the loss of wetlands is demonstrably compensated. |
| **(vi)[6] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.**<br>*Article 29 (5): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was **peatland** in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.* | |

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| **Type of Risk Assessment used** | ☐Level A – proof at national or sub-national level<br>☒Level B – management system at forest sourcing area level |
| **Level A risk assessment description** | N/A |
| **Level B management system at the level of the forest sourcing area** | Flanders (after 2007): peatlands are scarce remnants. Principal pressures are drainage, eutrophication, and legacy land use; no evidence of post-2007 conversion to forest. SIGMA and LIFE projects (e.g., Grote Netevallei, Schelde estuary) remove conifers and restore hydrology. The natuurtoets blocks afforestation on peat; forestry-driven loss is negligible. Wallonia (after 2007): the largest peatlands (Hautes Fagnes) are designated as Natura 2000 and nature reserves with hydrological plans. Pressures relate to climate and recreation, not afforestation. LIFE and the EU Peatlands & Heathlands program prioritise restoration, including removal of spruce on peat. Since 2023, CAP conditionality (BCAE-2) adds protection. Overall risk of conversion is low. Nonetheless, the same monitoring procedure applies, as for wetlands |
| **(vii) that installations producing biomass fuels from forest biomass, issue a statement of assurance, underpinned by company-level internal processes, for the purpose of the audits conducted pursuant to Article 30(3), that the forest biomass is not sourced from the lands referred to in point (vi).** | |
| **Type of Risk Assessment used** | ☒Level A – proof at national or sub-national level<br>☐Level B – management system at forest sourcing area level |
| **Level A risk assessment description** | Level A for Belgium Walloon region by BiomassConsult |
| **Level B management system at the level of the forest sourcing area** | *Not applicable, requirement only applies to Level A* |

| **LULUCF criteria 29(7)** | |
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| **Type of Risk Assessment used** | ☒ Level A – proof at national or sub-national level<br>☐ Level B – management system at forest sourcing area level |
| **Level A risk assessment description** | SBP-endorsed REDII Level A risk assessment for Article 29(7) LULUCF |
| **Level B management system at the level of the forest sourcing area** | N/A |

| **Countries where EU RED Supply Base Evaluation is used** | |
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| **Country** | France |
| **Area** | - |
| **Sustainable harvesting criteria 29(6)** | |

| (i) The legality of harvesting operations | |
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| **Type of Risk Assessment used** | ☐ Level A – proof at national or sub-national level<br>☒ Level B – management system at forest sourcing area level |
| **Level A risk assessment description** | N/A |
| **Level B management system at the level of the forest sourcing area** | Our monitoring system covers all forest biomass supplies and includes due diligence, supplier declarations, supplier evaluations, and harvesting plot assessments.<br>This indicator remained unchanged in the recast of the EU RED. The REDII Level A report for France rated this indicator as Low Risk, and our research this year did not find anything to question that conclusion. |
| **(ii) Forest regeneration of harvested areas** | |
| **Type of Risk Assessment used** | ☐ Level A – proof at national or sub-national level<br>☒ Level B – management system at forest sourcing area level |
| **Level A risk assessment description** | N/A |
| **Level B management system at the level of the forest sourcing area** | This indicator remained unchanged in the recast of the EU RED. The REDII Level A report for France rated this indicator as Low Risk, and our research this year did not find anything to question that conclusion. |
| **(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grasslands, heathland and peatlands, are protected with the aim of preserving biodiversity and preventing habitat destruction, unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes** | |
| **Type of Risk Assessment used** | ☐ Level A – proof at national or sub-national level<br>☒ Level B – management system at forest sourcing area level |
| **Level A risk assessment description** | N/A |
| **Level B management system at the level of the forest sourcing area** | In France, the risk of biomass harvesting interfering with the environmental goals of protected areas is low. The legal framework allows such activities only under strict conditions, requiring approved management plans and/or permits.<br>While we have concerns about outdated management plans and weaknesses in official monitoring and reporting, operations in practice contribute to nature protection. |
| **(iv) that harvesting is carried out considering the maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth forests as defined in the country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located, and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with requirements to use logging systems that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and habitats** | |
| **Type of Risk Assessment used** | ☐ Level A – proof at national or sub-national level<br>☒ Level B – management system at forest sourcing area level |

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| **Level A risk assessment description** | N/A |
| **Level B management system at the level of the forest sourcing area** | The risk for this indicator is low, however the EU RED requires our company monitors the quality of forest operations onsite in any case. Suppliers are assessed and categorised, and their harvesting teams are monitored accordingly: field inspections include document reviews, verifications of online maps and databases, site inspections, and interviews. The quality of operations in progress is evaluated, including deadwood retention levels, harvest impacts and measures safeguarding biodiversity and vulnerable soils (best practices).<br>An elaborate checklist is filled in. All inspections and findings are documented, including supporting documents and photographs. |
| **(v) That harvesting maintains or improves the long-term production capacity of the forest.** | |
| **Type of Risk Assessment used** | ☐ Level A – proof at national or sub-national level<br>☒ Level B – management system at forest sourcing area level |
| **Level A risk assessment description** | N/A |
| **Level B management system at the level of the forest sourcing area** | This indicator remained unchanged in the recast of the EU RED. The REDII Level A report for France rated this indicator as Low Risk, and our research this year did not find anything to question that conclusion. |
| **(vi)[1] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.**<br>*Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:*<br>*(a)* ***primary forest*** *and other wooded land and* ***old growth forest,*** *namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located. If there is no definition of* ***old growth forest*** *at the national level, then the following definition shall apply: A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.* | |
| **Type of Risk Assessment used** | ☐Level A – proof at national or sub-national level<br>☒Level B – management system at forest sourcing area level |
| **Level A risk assessment description** | N/A |
| **Level B management system at the level of the forest sourcing area** | 29(3)a: Although primary forests are often considered absent in metropolitan France, four protected parks contain forests that come sufficiently close: Parc des Ballons des Vosges, Haut-Jura, Pyrénées, and Vanoise. Old Growth Forests are present in France, in and outside of parks and protection zones. Biomass sourcing from the indicated parks and from Old Growth Forests in general are excluded from sourcing (No-Go areas). |
| **(vi)[2] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.**<br>*Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not* | |

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| *the land continues to have that status:*<br>*(b)* ***highly biodiverse forest*** *and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.* | |
| **Type of Risk Assessment used** | ☐Level A – proof at national or sub-national level<br>☒Level B – management system at forest sourcing area level |
| **Level A risk assessment description** | N/A |
| **Level B management system at the level of the forest sourcing area** | Forests in France host many protected species and can consist of key connectivity corridors. Many EU Habitat directive Annex I forest habitats are under pressure. They occur both inside and outside Natura 2000; recognition in plans is uneven, and additional investigation is needed. Annex I forest habitats under pressure are: - Beech forests (9110–9150) - Oak(-hornbeam) forests (9160) - Ravine forests (9180) - Old acidophilous oak woods (9190) - Thermophilous narrow-leaf ash woods (91B0) - Bog woodland (91D0) - Alluvial forests (91E0) - Riparian forests and galleries (91F0, 92A0, 92D0) - Sweet-chestnut secondary woods (9260) - Mediterranean endemic pine forests (9540) - Wooded dunes (2180) Some of these ecologically important forest habitats are not yet formally protected, but recognised in management documents, forest plans, or ecological inventories. In addition, they also occur in regular forests, although they are not always formally identified or categorised as such. The specified risk applies mainly to these valuable Annex I forest habitat types, and to forests containing key elements of such habitats, on private lands outside protected areas. Suppliers provide their harvest-site geolocations and assist in identifying Annex I habitats across all forest types. Our company monitors all biomass sourcing areas. Additionally, any biomass sourcing from forests established after 2007 triggers additional verification of the vegetation type in January 2008. The biodiversity values must have been maintained or improved since January 2008. FSC certification is recognised as supporting evidence within the risk-mitigation procedure. |
| **(vi)[3] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.**<br>*Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:*<br>*(d)* ***highly biodiverse grassland*** *spanning more than one hectare that is: (i) natural, namely grassland that would remain grassland in the absence of human intervention and that maintains the natural species composition and ecological characteristics and processes; or (ii) non-natural, namely grassland that would cease to be grassland in the absence of human intervention and that is species-rich and not degraded and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the harvesting of the raw material is necessary to preserve its status as highly biodiverse grassland.* | |
| **Type of Risk Assessment used** | ☐Level A – proof at national or sub-national level<br>☒Level B – management system at forest sourcing area level |
| **Level A risk assessment description** | N/A |
| **Level B management system at the level of the forest sourcing area** | Natural highly biodiverse grasslands are species-rich and self-sustaining. In France they are present, but they occur mainly above the climatic treeline and in fixed coastal dunes. Most sites are protected and monitored. After 2007, the main pressures are climate change, recreation, infrastructure, eutrophication, invasives, and dune dynamics; afforestation is not a driver. Conversion to forest is rare to absent. Natural highly biodiverse grasslands are No-Go areas, and there fore |

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| | trigger a specified risk. Biomass sourcing is excluded, with vigilance for their occurrence in unprotected areas. Any biomass sourcing along the coastline automatically triggers additional investigations as it can house habitat type 2130 (fixed coastal dunes with herbaceous vegetation), as well as 2180 (wooded dunes) and 4040 (Dry Atlantic coastal heath). Non-natural highly biodiverse grasslands are species-rich but depend on management such as extensive grazing, late mowing and shrub control. Since 2008, they have declined mainly due to agricultural intensification or abandonment, eutrophication, infrastructure and recreation; many Annex I types remain unfavourable and sensitive to nitrogen and scrub/pine encroachment. Conversion of "permanent sensitive grasslands" within the EU ecological network is prohibited via CAP conditionality, while five-year agri-environment contracts maintain species-rich meadows and pastures. However, there still are poorly mapped, unprotected parcels. This vegetation type is not a No-Go area, but it is subject to stricter controls than others; any biomass sourcing must actively contribute to it conservation. Restoration operations may remove shrubs/trees and adjust hydrology; tree-planting schemes must avoid sensitive grasslands. Specified risk for managers of young forests or degraded grassland after 2007. Post-2007 afforestation or succession is investigated against the January 2008 baseline using plans, permits, online maps and databases, with field inspections and stakeholder consultation. Forest area is significantly increasing in France. |
| **(vi)[4] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.**<br><br>*Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:*<br>*(e) **heathland** - Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).* | |
| **Type of Risk Assessment used** | ☐Level A – proof at national or sub-national level<br>☒Level B – management system at forest sourcing area level |
| **Level A risk assessment description** | N/A |
| **Level B management system at the level of the forest sourcing area** | Large areas and small patches of heathland are present in France and are excluded from biomass sourcing. As it is a No-Go area is also is Specified Risk. France's heathlands (4010 European dry, 4030 Northern Atlantic wet, 4040 Atlantic coastal/dune, 4060 Alpine/subalpine) are relics of a once extensive landscape. Historic drainage, agricultural improvement, conifer planting, urbanisation and infrastructure drove losses; remnants are fragmented and sensitive to nitrogen deposition, shrub/pine encroachment, invasives, recreation and increasing fire/weather extremes (with extinction-debt risks). There is near to half a million ha left. Main complexes occur on Atlantic/Channel coasts, Brittany/Armorican Massif, and Alps/Pyrenees/Massif Central. Most significant areas are in designated areas (Natura 2000/nature reserves/parks) and managed through grazing, targeted shrub/tree removal, hydrological measures and, where authorised, tightly controlled burning. Their status is generally unfavourable. |
| **(vi)[5] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.**<br>*Article 29 (4): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land* | |

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| *with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status: (a)* ***wetlands,*** *namely land that is covered with or saturated by water permanently or for a significant part of the year (NOTE: Evidence of verification of wetlands should reflect seasonal changes within a year).* | |
| **Type of Risk Assessment used** | ☐Level A – proof at national or sub-national level<br>☒Level B – management system at forest sourcing area level |
| **Level A risk assessment description** | N/A |
| **Level B management system at the level of the forest sourcing area** | Since 2007, wetland has been under pressure from agri-water management, urbanisation/infrastructure, pollution and extreme weather conditions, but not from afforestation. While large-scale restoration and legal screening constrain planting and often remove trees; forestry on wetlands is not a loss driver, and post-2023 CAP adds farm-wetland protections. Conversion risk is low, but any indication triggers an investigation. Confirmed cases exclude biomass, unless lawfully compensated. Our company and our suppliers flag any biomass sourcing from suspected wetland sites, triggering biodiversity investigations. |
| **(vi)[6] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.**<br>*Article 29 (5): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was* ***peatland*** *in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.* | |
| **Type of Risk Assessment used** | ☐Level A – proof at national or sub-national level<br>☒Level B – management system at forest sourcing area level |
| **Level A risk assessment description** | N/A |
| **Level B management system at the level of the forest sourcing area** | France's peatlands are widely protected (Natura 2000, Ramsar, national designations); forestry conversion is not a current driver, and forests on drained peat are very rare. Since 2007, the main pressures have been agriculture, local infrastructure and climatic effects. Policy prioritises rewetting and, where needed, conifer removal; afforestation on peat is restricted. The risk level is low. Potential impacts are mainly indirect, for example, groundwater drawdown from adjacent drained farmland. However, any indication of drainage issues still triggers a desk-based review (permits, maps, hydrology) and, if required, a site inspection. Confirmed and unresolved cases are excluded from biomass sourcing. Areas which were converted to urban or infrastructure uses in the past do not yield biomass anymore. |
| **(vii) that installations producing biomass fuels from forest biomass, issue a statement of assurance, underpinned by company-level internal processes, for the purpose of the audits conducted pursuant to Article 30(3), that the forest biomass is not sourced from the lands referred to in point (vi).** | |
| **Type of Risk Assessment used** | ☒Level A – proof at national or sub-national level<br>☐Level B – management system at forest sourcing area level |
| **Level A risk assessment description** | Level A for Belgium Walloon region by BiomassConsult |
| **Level B management system at the level of the forest sourcing** | *Not applicable, requirement only applies to Level A* |

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| **area** | |

| **LULUCF criteria 29(7)** | |
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| **Type of Risk Assessment used** | ☒ Level A – proof at national or sub-national level<br>☐ Level B – management system at forest sourcing area level |
| **Level A risk assessment description** | SBP-endorsed REDII Level A risk assessment for Article 29(7) LULUCF |
| **Level B management system at the level of the forest sourcing area** | N/A |

## Annex 2a: EU RED II Supply Base Evaluation

## Annex 3: SBP Processing residues and/or Post-consumer feedstock requirements

☐ Not Applicable (Processing Residues and/or post-consumer feedstock not used)

### Verification and monitoring of suppliers

Our company verifies all suppliers before deliveries commence. Each supplier signs a PEFC/SBP/EU RED selfdeclaration and undergoes an onsite evaluation covering their operations, supply chain, and feedstock categories.
Identified risks are assessed and, where minor, addressed through mitigation measures; significant risks result in suspension of cooperation. Suppliers are re-evaluated annually, or more frequently when risks are detected. EU RED compliance status is stated in the main procurement database only after a successful evaluation. All evaluation reports, supporting documents, and photos are stored.

### Feedstock inspection and classification upon receipt

See above. EU RED compliance is verified for each supplier and feedstock type both prior to and during procurement. Determination tables of approved suppliers and feedstock categories are maintained to support the verification of delivery documentation and invoices.
Reference samples may be used to compare incoming biomass. The results are recorded in the feedstock entry databases.

### Supplier audit for processing residues and post-consumer feedstock

See above. Suppliers of processing residues feedstock are visited to establish their origin (and first gathering point). Onsite assessments include evaluating the production process, verifying the supply chain, and checking for equipment that could misclassify primary wood as processing residues or wastes.
Findings are systematically documented and stored.

## Annex 4: EU RED detailed findings for Trees Outside Forest (TOF) feedstock

*NOTE: For "Trees outside forests (TOF) – Urban and landscape feedstock" no EU RED sustainability requirements apply, only the GHG savings criteria apply (SBP EU RED Bridging ID v2.0 Section 1.1). The land use category in this case is neither forest land nor agricultural land. For "Trees outside forests (TOF) – Agricultural land feedstock" the applicable criteria are Article 29 paragraphs (2)-(5).*

**Country: Belgium - -**

Not Applicable - only urban and landscape feedstock is used

## Annex 4a: RED II detailed findings for Trees Outside Forest (TOF) feedstock

*NOTE: For "Trees outside forests (TOF) – Urban and landscape feedstock" no REDII sustainability requirements apply, only the GHG savings criteria apply (SBP REDII Bridging ID Section 4.2). The land use category in this case is neither forest land nor agricultural land. For "Trees outside forests (TOF) – Agricultural land feedstock" the applicable criteria are Article 29 paragraphs (2)-(5).*