Supply Base Report:

Foronex BV.
Scope Change 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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1 Overview

Producer name:	Foronex BV.
Producer address:	Ooigemstraat 16, 8710 Wielsbeke, Belgium
SBP Certificate Code:	SBP-06-83
Geographic position:	3.361631, 3.361631
Primary contact:	Andy Vandenberghe, +32 498 905 541, andy.vandenberghe@foronex.eu
Company website:	
Date report finalised:	24 Sep 2026
SBR reporting period from:	01 Feb 2025
SBR reporting period to:	31 Jan 2026
Name of the Certification Body:	Control Union Certifications BV
Certification Body Approval date:	04 Oct 2026
SBP Standard(s) used:	SBP Standard 1: Feedstock Compliance v2.0, 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 1A: SBP Requirements for Primary Feedstock from Trees Outside Forests (TOF) v1.0, Instruction Document 5E: Collection and Communication of Energy and Carbon data. v2.1, Instruction Document EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413
Feedstock origin (countries)	Belgium (-), France (European area), Germany (-), Netherlands (European area), Luxembourg (-)
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

Founded BV in 1967 as a family business, Foronex BV specializes in the collection, delivery, processing, and trade of residual wood from forests, landscapes, the wood processing industry, and other sectors.
It operates an office and storage facility in Wielsbeke (West Flanders) and supplies biomass to various ports in Belgium and France.
Foronex BV is a major player in Belgium in the distribution of wood and agricultural residues but does not reach the turnover levels of the local paper mills.
Foronex BV owns two subsidiaries: Foronex Transport BV and Foronex France Transport SARL, operating around 40 trucks. Our company is SBP, PEFC, and SURE certified.

Products included in the scope of SBP Certification: *WB 1.1 Wood pellets, WB 2.1 Wood chips, WB 2.2 Sawdust, WB 2.3 Wood shavings, WB 2.4 Other residues from wood processing*

Number of employees: *13*

Annual maximum production capacity (metric tonnes): *350000*

Number of direct feedstock suppliers: *50*

Approximate number of feedstock sub-suppliers: *0*

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

Foronex BV collects low-grade residues from registered companies active in forestry, landscape management, urban operations, and the processing industry, and distributes them across several sectors, including the bioenergy sector. The company manages a few storages places throughout the supply base.
Foronex BV builds long-term relationships with suppliers and customers to stabilize and improve production conditions in the region, following the cascading principle. At its main facility in Wielsbeke, Foronex BV routinely blends different types of biomass and has the capacity to crush wood industry offcuts.

2.2 Detailed description of the Supply Base

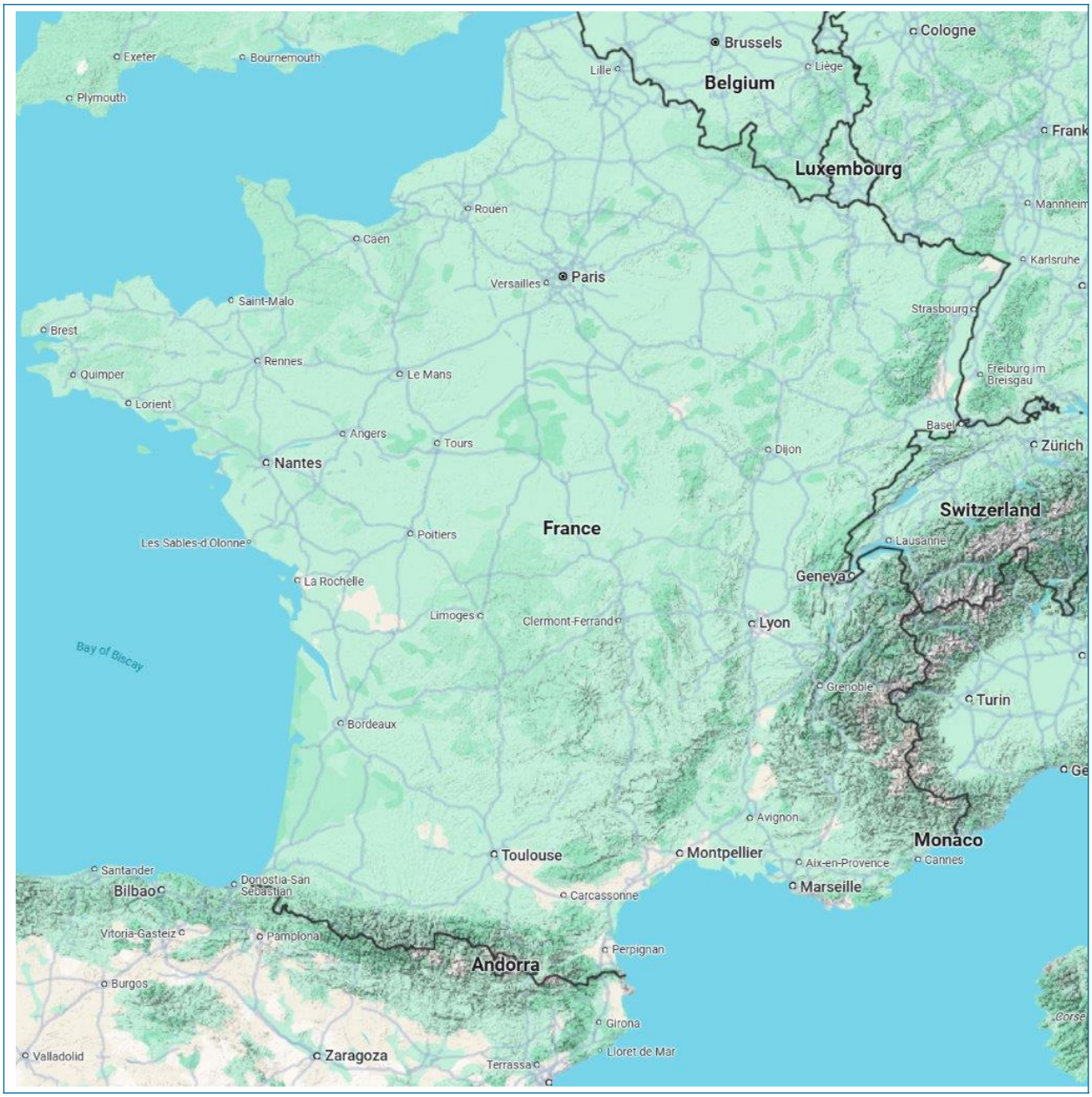
Guidance: Tables below have been generated automatically for each sourcing country based on the selection of 'Feedstock origin (countries)' in section 1 above.

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.

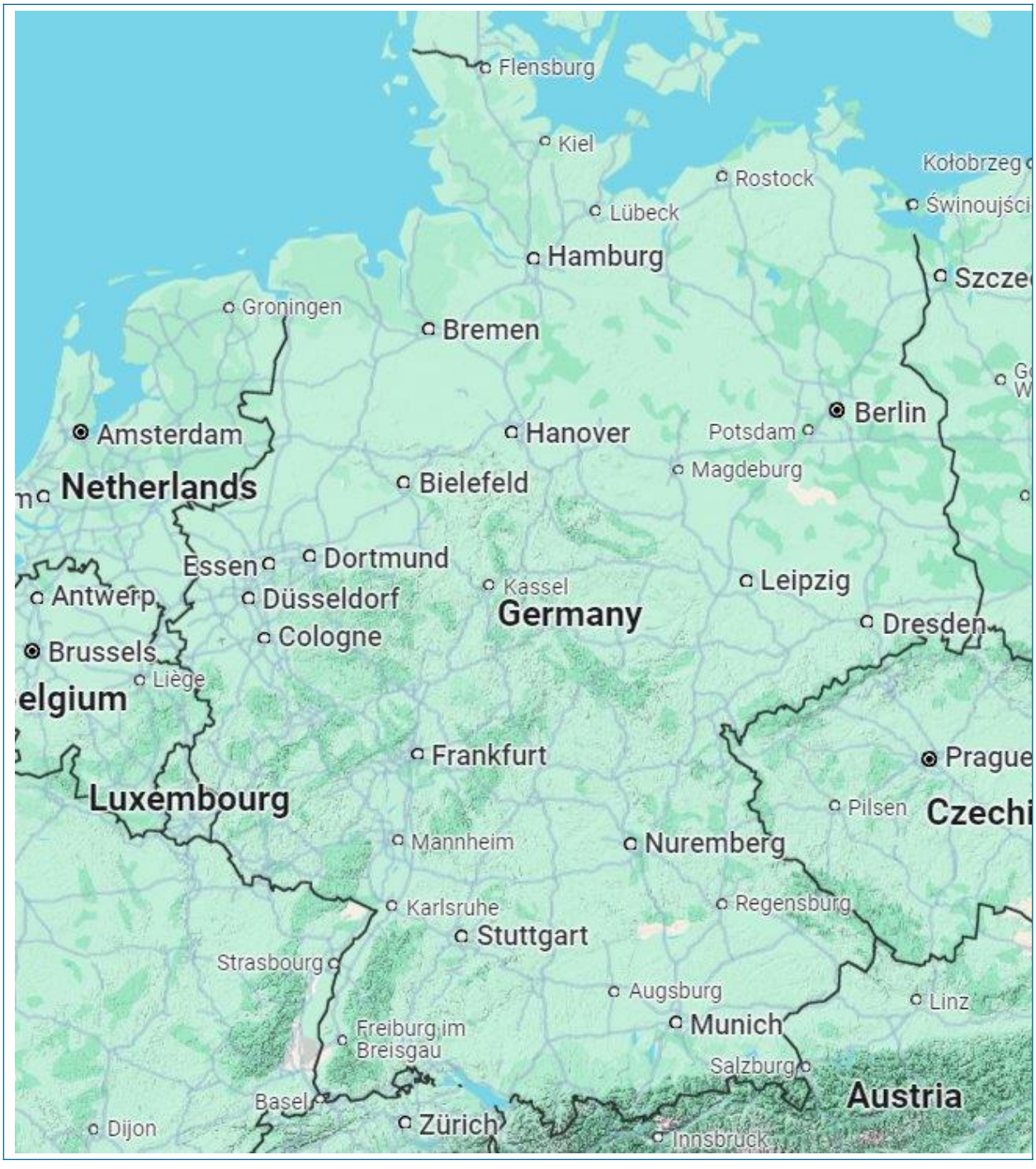
Country	France
Area/Region	European areas
Exclusions	Non-European areas
Feedstock types	Primary feedstock, Processing residues
Feedstock Product Groups	Forest feedstock (1A), Trees outside forest (TOF) - Urban and landscape feedstock (2A), Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant 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)	Yes – Biomass Producer's own risk assessment used (SBE)
Provide a concise summary of why a SBE was determined to be required or not required here:	
Foronex had been awaiting sufficient market demand for SBP-compliant biomass from metropolitan France to justify the necessary investments. Demand reached this level in the second half of 2026. Primary wood must meet the SBE requirements to qualify as SBP-compliant biomass, even when sourced from certified forests. See also the rationale in the SBE Belgium section.	
Feedstock types included in SBE:	Primary feedstock
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):	55.1695
Map(s) of the Supply Base area:	



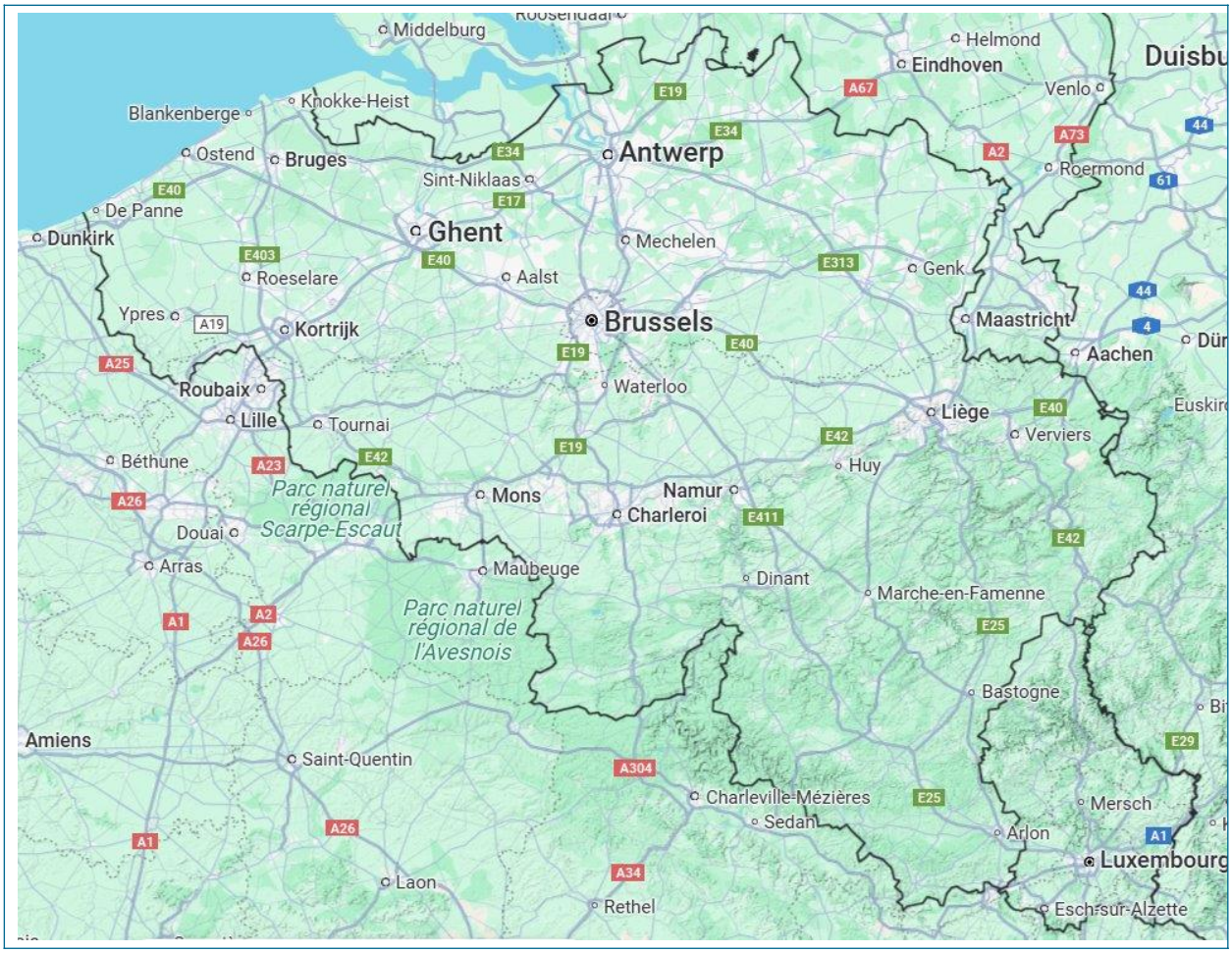
Country	Germany
Area/Region	-
Exclusions	
Feedstock types	Primary feedstock, Processing residues
Feedstock Product Groups	Forest feedstock (1A), Trees outside forest (TOF) - Urban and landscape feedstock (2A), Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock , SBP Controlled feedstock
Is the forest managed to supply energy and non-energy	No

markets?	
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:	
Foronex sources limited volumes from this country, and demand for SBP-compliant biomass from this origin is insufficient to justify the costs of developing and implementing an additional SBE.	
Feedstock types included in SBE:	N/A
Includes EU RED SBE:	No
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):	35.7576
Map(s) of the Supply Base area:	



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)	Yes – Biomass Producer's own risk assessment used (SBE)
Provide a concise summary of why a SBE was determined to be required or not required here:	
The SBE is required to evaluate if primary volumes are SBP-compliant; FSC and PEFC forest management certification are not considered sufficient proof of sustainability under SBP. Foronex commissioned an independent consultancy agency to prepare the SBE, with the assignment to carry out an objective analysis. For the biomass market, it is important that the SBE is of high quality, based on recent literature references and conducted with an objective research approach, as hiding actual issues damages the sector in the long run. The SBE not only compiles substantiations for the risk ratings but also considers different published opinions and explains why certain opinions were, or were not, sufficient to affect the risk rating. Foronex is convinced that sourcing biomass can be done sustainably, but it requires consideration and effort. By investing in an objective SBE, Foronex aims to contribute to a transparent biomass market and help guard against the misrepresentation of sustainability risks. Commercial entities often tend to minimize existing risks. As has been observed in the past, the SBE produced by Foronex has been used by other SBP certificate holders (although without proper referencing). *Note: The previous SBE developed by Foronex and BiomassConsult has been copied, partially or nearly in full, by other biomass producers. While this is not prohibited, proper referencing remains a certification requirement for any SBE. Using this work without clear reference constitutes a serious mistake (plagiarism). The SBE is not merely a compilation of information from publications; it also incorporates research into stakeholder input, unique deliberations on issues and risks, our own interpretations and conclusions, years of practical experience, and original mitigation measures.*	
Feedstock types included in SBE:	Primary feedstock
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:	



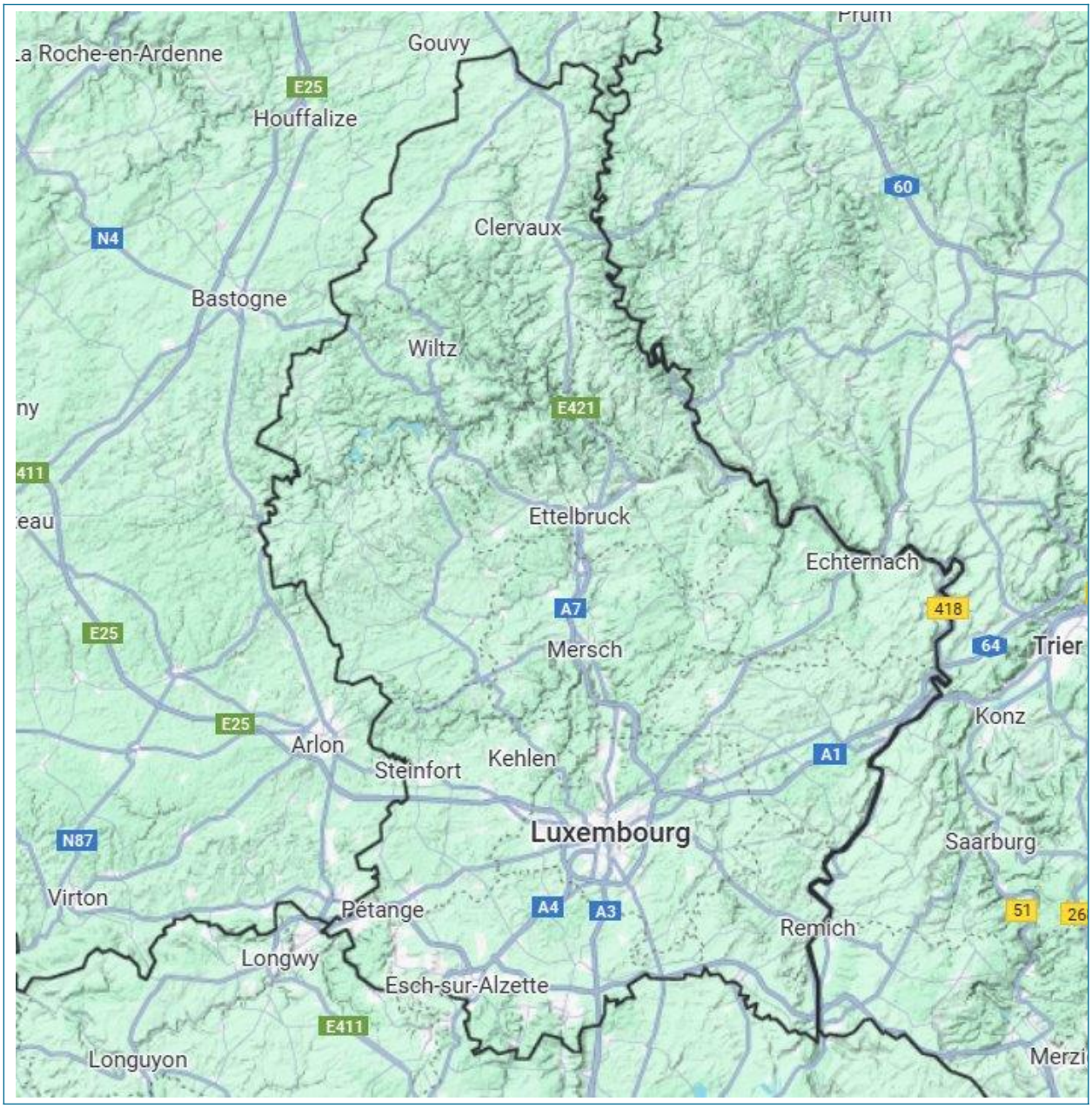
Country	Netherlands
Area/Region	European area
Exclusions	
Feedstock types	Primary feedstock, Processing residues
Feedstock Product Groups	Forest feedstock (1A), Trees outside forest (TOF) - Urban and landscape feedstock (2A), Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock , 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:	
Foronex sources very limited volumes from this country, and demand for SBP-compliant biomass from this origin is insufficient to justify the costs of developing and implementing an additional SBE.	
Feedstock types included in SBE:	N/A
Includes EU RED SBE:	No
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):	4.1543
Map(s) of the Supply Base area:	



Country	Luxembourg
Area/Region	-

Exclusions	
Feedstock types	Primary feedstock, Processing residues
Feedstock Product Groups	Forest feedstock (1A), Trees outside forest (TOF) - Urban and landscape feedstock (2A), 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:	
Foronex sources very limited volumes from this country, and demand for SBP-compliant biomass from this origin is insufficient to justify the costs of developing and implementing an additional SBE.	
Feedstock types included in SBE:	N/A
Includes EU RED SBE:	No
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):	0.2586
Map(s) of the Supply Base area:	


Prüm
Gouvy
La Roche-en-Ardenne
E25
Houffalize
60
N4
Clervaux
Bastogne
Wiltz
E421
411
Ettelbruck
Echternach
A7
418
E25
Mersch
64
Trier
E25
Konz
Arlon
Steinfort
Kehlen
A1
N87
Luxembourg
Saarburg
Virton
Pétange
A4
A3
51
Remich
Longwy
Esch-sur-Alzette
E411
Longuyon
Merzig

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:

Acer spp.	Maple
Alnus glutinosa	Alder
Betula spp	Birch
Carpinus betulus	Common hornbeam
Castanea sativa	Sweet chestnut
Fagus sylvatica	European beech
Fraxinus excelsior	European ash
Populus spp	Poplar (incl. Aspen)
Prunus avium	Wild cherry
Prunus serotina	Black cherry
Quercus spp	Oak
Robinia pseudoacacia	Black locust
Salix alba	White willow
Sorbus aucuparia	Rowan
Tilia cordata	Small-leaved linden
Ulmus minor	Field elm
Picea abies	Norway spruce
Abies spp	Fir
Pinus sylvestris	Scots pine
Pseudotsuga menziesii	Douglas fir
Aesculus hippocastanum	Horse chestnut

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

Explanation: It can occur that a plot is harvested, because of a pest/disease, or because measures are taken to reduce the risks. The amount effected by such disturbances varies per region and year. In some regions in Germany, the share of affected forests has been high.

e. Hardwood (i.e. broadleaf trees): specify proportion of feedstock from (%): 70.00

f. Softwood (i.e. coniferous trees): specify proportion of feedstock from (%): 30.00

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 (%):** 20.00

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:**

85.00 % PEFC controlled

15.00 % PEFC certified

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:** 80000 tonnes

q. **What is the estimated amount of EU RED-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated):** 22000000.00 m3

Explanation: FAOstat indicates that France and Belgium produced over 25 million m3 of wood fuel in 2024. However, not all volumes can be considered EU RED compliant.

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

Forest management in Belgium and metropolitan France is generally well organised and regulated. However, the assessments against SBP Standard 1 identified gaps in requirements and their implementation that require additional sourcing checks. In both countries, biodiversity and High Conservation Values (HCVs) require explicit safeguards, including outside protected areas. Forest certification alone does not cover all SBP requirements. The assessments also address EU RED III no-go areas. In Belgium, the unfavourable conservation status of 10 native forest habitat types listed in Annex I of the EU Habitats Directive underlines the need for these safeguards; in France 17 such valuable forest habitats are under pressure.
Five indicators were classified as Specified Risk in Belgium and ten in France. However, for several indicators, this classification applies only to specific ownership and land-use categories. Besides biodiversity and HCV protection, the French assessment identified risks concerning historical land conversion, ecosystem resilience, regeneration, mandatory fire-prevention clearance, low-productivity forests and cascading use.
Foronex's risk mitigation procedures apply to all sourcing areas and situations. Biodiversity values can develop within a short period, so general inventories and maps may not adequately describe conditions at the time of harvesting. Foronex often arrives after the main operations and cannot influence decisions already taken. The company therefore checks available evidence of the original conditions, pre-harvest assessments and measures implemented. Site inspections are carried out where they can resolve uncertainty. If operations have caused unacceptable damage or the available evidence is insufficient to resolve the risk, the material is not accepted as SBP-compliant. Staff also remain alert to problems concerning indicators classified as Low Risk.
These checks take considerable time, but the procedures are straightforward. Foronex's specialists can recognise relevant forest habitats, biodiversity values and appropriate sourcing practices. In Belgium, implementing the SBE has reduced the volume of material eligible for acceptance while improving control over legality and sustainability. Contact with suppliers, harvesting teams, authorities and specialists is part of this work. The same approach is now also being applied in France.

3.2 Conflicts with applicable national and sub-national legislation

No explicit conflicts between SBP requirements and applicable legislation or regulations were identified in Belgium or metropolitan France. However, some SBP and EU RED requirements exceed the minimum requirements of the applicable national and regional forestry frameworks.

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.

Country: Belgium

Area/sub-scope:	
Risk Assessment used:	
	☐SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.1.2 Threats to and impacts on the identified key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified and evaluated.	
Description of the specific risk:	
This indicator applies to Forests and Trees Outside Forests (TOF) - Landscape (not to TOF - Urban). Specified risk on HCV 3. Low risk on the other HCVs. In general, HCV 3 is managed adequately in Belgium through a comprehensive legal framework, species protection measures, and designated areas such as Natura 2000 sites. However, a specified risk has been identified for 10 habitat types listed in Annex I of the EU Habitats Directive. These habitats are currently indicated with the worst conservation status. The risk is considered present across all territories, including landscapes, private and public forests, national parks, protected areas, and Natura 2000 sites.	
Mitigation measure:	
To mitigate the identified risk related to endangered Annex I forest habitats (HCV3), our company applies a precautionary approach. The general procedure for assessing harvesting areas is defined as a mitigation measure under indicator 2.1.3. For each sourcing area, documentation on management operations is collected. Using this, along with online maps and databases, some areas can be excluded early if they clearly lack ecosystem elements typical of the ten valuable habitat types. If such elements are identified or possibly present, the location, relevant forest management plans, and harvesting permits are re-examined with regard to the environmental impact assessment and conservation measures targeting the habitat type or its components. The minimal required effort of habitat conservation (active or passive) depends on the classification of the area as protected or regular. In protected areas, such as Natura 2000 sites, the management operations and plans must demonstrably contribute to the improvement of the endangered habitat type. In non-protected areas, the presence of valuable forest elements must at least be preserved (to the present level). These may not be further endangered or replaced through the harvesting operations. If typical elements of one of the high-value habitat types are present, biomass may only be sourced from maintenance operations (not clear cuts) that contribute to the conservation of those features. Areas with approved forest management plans or harvesting permits may be accepted only if the environmental impact	

has sufficiently been assessed and effective conservation practices are demonstrated. Additional verification may include examination of the regional context, plot-level review, and confirmation that best practices are applied in forest residue removal.
FSC certification is considered sufficient to demonstrate compliance. According to the SBP benchmark, PEFC certification may not guarantee adequate environmental impact assessment; therefore, PEFC-certified areas require further review.
In case of insufficient evidence or doubt, the area is excluded from the SBE.

Monitoring and outcomes:

Foronex conducted in-depth monitoring of forest planning and operations in and outside protected areas—such as Natura 2000 sites—that contain or may contain high-conservation-value forest habitats. While many cases showed good implementation, recurring gaps in documentation and inconsistencies with conservation objectives were observed. Sourcing areas are always visually inspected when one of the ten identified forest habitat types, or elements thereof, is present or might be present.
While most protected areas and zones are managed effectively and sustainably, Foronex regularly needed to ask authorities and forest owners for additional clarifications, where management plans or operational permits lacked a clear contribution to the conservation of the ten forest habitat types.
In Flanders, most activities in Natura 2000 areas were implemented as planned, and visual inspections confirmed positive outcomes. However, several felling permits lacked habitat-specific detail, using general terms like "native broadleaves" and in some cases included species not suited to the targeted Natura 2000 habitat types. Forest management plans varied in quality, and some did not convincingly address Natura 2000 objectives. Geopunt often maps valuable habitat types in private forests, apparently based on the site's ecological potential rather than the existing vegetation.
In Wallonia, documentation was generally more limited. Some cases referred only to broad conservation goals and lacked spatial detail. In certain instances, approved management plans could not be retrieved despite repeated efforts, making full verification impossible.
Additional research was carried out in all unclear cases. Despite legal compliance, several sites did not pass the SBE due to unresolved concerns regarding habitat conservation practices or inadequate documentation.

Country: Belgium

Area/sub-scope:

Risk Assessment used:

	☐SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim

	☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment

Indicator with specified risk:

2.1.3 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.

Description of the specific risk:

This indicator applies to Forests and Trees Outside Forests (TOF) - Landscape (not to TOF - Urban)
Habitats and species with high biodiversity and conservation value may emerge over short timeframes. To ensure these values are not overlooked, every plot must be assessed before operations begin.
Our company applies a precautionary approach: the risk of impacting conservation values is considered present across all territories, including landscapes, private and public forests, national parks, and protected areas such as Natura 2000 sites.

Mitigation measure:

Biomass only passes the SBE if it originates from operations that demonstrably avoid harm to important environmental values. Harvesting teams must notify our Certification Manager in advance, allowing time for proper plot assessment.
Assessment Step Plan (Certification Manager):
1. Document request and review
Forest management plans and harvesting permits are requested and checked for accuracy and completeness. If information is unclear or missing, or if inconsistencies arise, the supplier is contacted again. In case of doubt our company also contacts the relevant authority directly.
2. Desk research
The plot is reviewed using online maps, satellite imagery, and official databases. The Certification Manager checks the area's legal and ecological status, including possible designations such as Natura 2000, national park, known sensitive habitat types, or the potential presence of protected species.
3. Assessment
Before any site visit, the Certification Manager evaluates context-specific risk factors, including the timing of operations (like nesting periods), and the type, ecological condition, and size of the surrounding forest (for example a large mature spruce monoculture vs. a small and vulnerable beech forest), and other local sensitivities. The forest habitat type is determined as precisely as possible based on available data. On basis of the findings, the supplier is interviewed to assess their awareness of any identified environmental values and applicable biodiversity obligations.
4. Onsite inspection
Nearly always, a field inspection is carried out before or during the operations. This allows for direct verification of environmental values, forest type, and operational practices. Our company expects from our suppliers that best practices are applied onsite. A site is only not visited if the likelihood of biodiversity values is minimal and there is sufficient prior experience with the supplier's compliance and quality of work.

Verification and Decision
The Certification Manager discusses the findings with the supplier to confirm alignment between planned operations and biodiversity obligations.
Harvesting plots are accepted only if environmental values are assessed and conservation measures are clearly respected. In case of any doubt the plots are excluded from the SBE.
FSC-certified areas are accepted as compliant. PEFC-certified areas are subject to additional review, as

PEFC does not always guarantee sufficient environmental assessment under the SBP benchmark.
In case of doubt or insufficient evidence, the area is excluded.
All assessments are documented systematically per supplier and per plot. This includes the completed assessment checklist, relevant documents, photos, etc.
This procedure serves as the framework for implementing the mitigation measures under indicators 2.1.2, 2.2.2, 2.2.3, 3.2.2, and 3.2.3. While the specific aspects assessed under each indicator differ, the method and steps of the assessment are the same.
As a result of strict inspections and increased requirements under SBP version 2 and REDIII, more suppliers will fall short of compliance, meaning our company will do more work while achieving less output.

Monitoring and outcomes:

See monitoring outcomes under the previous specified risk indicator on high-conservation-value forest habitats.
In addition to habitat-specific assessments, Foronex monitored broader biodiversity and ecosystem impacts across sourcing areas in Flanders, Wallonia, and the Brussels Region.
While many operations complied with planning requirements and legal obligations, weaknesses remain in the integration of biodiversity considerations into forest management. These include vague replanting prescriptions, inconsistent ecological guidance, and limited documentation—particularly outside Natura 2000 areas.
Regarding Flanders, Geopunt regularly provides information on potential biodiversity values rather than actual conditions, making monitoring more demanding.
In Wallonia and Brussels, spatial data gaps and fragmented responsibilities further complicated the assessment of biodiversity outcomes, especially for smaller landscape elements such as hedgerows and isolated trees. In some instances, uncertainties regarding ecological impact or compensation required additional investigation. In isolated instances, signs of forest degradation were observed, including regeneration with monocultures of low value species. Some forestry consultancies continue to promote the cultivation of poplar plantations (in Wallonia). However, most in Belgium agree: that's something from the past.
Foronex conducted follow-up research and field inspections in all unclear cases. Regularly sourcing areas did not pass the SBE due to unresolved concerns about biodiversity impacts or insufficient ecological justification.

Monitoring of Harvesting Companies
All harvesting is carried out by officially licensed suppliers. Foronex has worked with the same harvesting teams for many years. These companies have consistently delivered adequate results. When a new harvesting company is introduced, Foronex conducts a site visit before any cooperation begins: machinery is reviewed, working methods are observed, and clear agreements are made on best practices, for example, on using lighter equipment in sensitive areas to minimise environmental impact. The mitigation procedure requires on-site verification when research indicates the presence or potential presence of HCVs, elements of valuable forest habitat types, or other ecological, or biodiversity conservation values. Every on-site inspection includes an evaluation of the quality of the executed work. Random site inspections are also conducted to check the performance of the harvesting teams. These may occur even in routine sourcing areas, including for example roadside pruning operations.

Country: Belgium

Area/sub-scope:	
Risk Assessment used:	
	☐SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
3.2.2 Primary feedstock shall not be sourced from forest areas where site productivity is low and, according to local definitions or norms, the areas are classified as low-productive or difficult to regenerate.	
Description of the specific risk:	
This indicator applies to Forests only, not to Trees Outside Forests (TOF). The indicator states unambiguously that biomass shall not be sourced from low-productive or difficult-to-regenerate areas. The possibility of making a conditional exception is not explicitly mentioned in the SBP guidance, though likely implied. In Belgium, such forests exist — mainly within protected areas and zones — and biomass sourcing does occur, creating a risk of non-compliance, partly due to the indicator's strict wording.	
Mitigation measure:	
Foronex verifies the management plans and operational practices both within and outside the protected areas and zones. Our general risk mitigation procedure (see indicator 2.1.3) includes the assessment of sourcing areas for biodiversity, environmental values, and sustainable regeneration using supplier documentation, online maps and databases, and field inspections. The integration of the REDIII requirements into this procedure clarifies and specifies several conservation topics that were already being addressed. BiomassConsult's "REDIII Compliance Approach" is applied to close the remaining gaps. It covers the requirements of REDIII paragraphs 29(3–5) on no-go areas and paragraph 29(6) on the mandatory verification of biomass sourcing operations. The sourcing area can pass the SBE if forest management (plan) is sustainable, sourcing operations do not harm ecological values, do not cause significant carbon emissions from harvesting in combination with slow or prolonged regeneration, and do not result in forest degradation. However, if the area may at the same time be considered an old-growth forest, it is excluded unconditionally.	
Monitoring and outcomes:	
See indicators 2.1.2 and 2.1.3 for monitoring outcomes. Monitoring focuses on the correct categorisation of all sourcing areas, the (planned) objectives of operations, and the quality of the executed work. Importantly, areas with high ecological value are actively	

identified not only in protected zones, but also in non-designated areas. If issues are found, they are communicated to all stakeholders involved.
Operations in protected areas and zones are typically aimed at conserving the valuable and vulnerable ecosystems present and are mostly carried out correctly, aligning with REDIII requirements.

Country: Belgium	
Area/sub-scope:	
Risk Assessment used:	
	☐SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
3.2.3 feedstock shall not be sourced from forest areas in the Supply Base which, according to local definitions or norms, are classified as having combined attributes of high carbon stocks and high conservation value (HCV).	
Description of the specific risk:	
This indicator applies to Forests only, not to Trees Outside Forests (TOF). The indicator states unambiguously that biomass shall not be sourced from forests having combined attributes of high carbon stocks and high conservation value (HCV). The possibility of making a conditional exception is not explicitly mentioned in the SBP guidance, though likely implied. In Belgium, such forests exist — mainly within protected areas and zones — and biomass sourcing does occur, creating a risk of non-compliance, partly due to the indicator's strict wording.	
Mitigation measure:	
See the mitigation measures of the previous indicator 3.2.2. The topic of high carbon stocks and HCV is well covered by REDIII paragraphs 29(3–5), while paragraph 29(6) requires onsite verification of best practices. The integration of the REDIII requirements from the mentioned paragraphs into our general mitigation procedure for Belgium (see indicator 2.1.3) serves as a specification of the assessment method. The assessment method already paid special attention to 10 high-value forest habitat types in Belgium (see indicator 2.1.2). The sourcing area can pass the SBE if forest management (plan) is sustainable, sourcing operations do not harm ecological values, do not cause significant carbon emissions from harvesting in combination with slow	

or prolonged regeneration periods, and do not result in the loss of conservation values. However, if the area may at the same time be considered an old-growth forest, it is excluded unconditionally.
Monitoring and outcomes:
See indicators 2.1.2 and 2.1.3 for monitoring outcomes. Monitoring focuses on the correct categorisation of all sourcing areas. Forests with ecological or conservation value are actively sought—not only in protected zones, but also in non-designated areas. The (planned) objectives of operations and the quality of the executed work are assessed in each case. If any issues are identified, they are communicated to all relevant stakeholders. The operations in protected areas and zones are typically aimed at conserving the valuable and vulnerable ecosystems present and are mostly carried out correctly, in line with REDIII requirements. In the context of this indicator (on high carbon stocks and High Conservation Value Forests), the unconditional exclusion of old-growth forests under REDIII, even in cases where management operations would support their preservation, is relevant.

Country: Belgium	
Area/sub-scope:	
Risk Assessment used:	
	☐SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
3.3.1 Feedstock sourcing shall be in compliance with the principles of cascading use, high quality stem wood shall not be used as feedstock if it is in substantial demand for long-lived products in the Supply Base.	
Description of the specific risk:	
This indicator applies to Forests only, not to Trees Outside Forests (TOF). On the cascade principle and the use of biomass for renewable energy, the Belgian governments have taken an active stakeholder engagement approach, including the possibility of enforcement measures. However, the current governing framework remains insufficient to ensure that renewable energy support schemes will not undermine the efficient use of primary feedstock. Given Belgium's highly developed wood processing industry, there is a risk that policy incentives, such as subsidies and green certificates, both from	

the regions themselves and from other European countries, create competition with the wood and paper industry.
Mitigation measure:
Priority is given to our non-energy customers, provided that deliveries remain economically feasible, even when such deliveries are less profitable as to the energy sector.
Monitoring and outcomes:
Foronex has long supplied primary, secondary, and tertiary wood residues and wastes to a broad range of industries, maintaining active engagement with customers to support long-term, stable business relationships. Based on this strategy and its long-term objectives, the company is well positioned to assess the suitability of raw material for different customers and to apply the cascading principle in practice. This approach is key in our mitigation measure on the cascading principle.

Country: France	
Area/sub-scope: European area	
Risk Assessment used:	
	☐SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.1.1 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.	
Description of the specific risk:	
Specified Risk for: • Uncertified private forests • PEFC-certified private forests • Landscape Trees Outside Forests (TOF) The areas above may lack sufficient pre-harvest identification of biodiversity values. General inventories, including online databases and maps, and general legal requirements can miss recent biodiversity developments such as nesting, important cavity trees and other dynamic site features. For example, wet	

microhabitats, unprotected ZNIEFF features and other locally important ecological features may be absent from general maps.
Many forests and environments in France comprise, or retain key elements of, EU Habitats Directive Annex I habitats. However, management decisions on public and private areas may prioritise other objectives. Stands with such biodiversity values are still at risk of being clear-cut and replaced.
Operations in low-biodiversity forest plantations and some types of roadside areas may be classified as Low Risk where evidence supports that relevant biodiversity values are absent. Breeding periods must nevertheless be respected.
According to the French Ministry of Agriculture, France experienced an estimated net annual loss of 23.5 thousand kilometres of hedges and tree lines during 2017–2021, equivalent to approximately 1.5% of the national network. Excessively frequent cutting and unsuitable machinery also cause hedge degradation and long-term tree mortality. Additionally, in TOF - Landscape, dynamic biodiversity features, including nests, cavity trees and local corridors may remain unidentified where operations rely on general online databases without a site-specific pre-harvest inventory.
In its general benchmark of PEFC, SBP found that PEFC does not require owners to identify the full range of biodiversity features covered by SBP.

Mitigation measure:

As part of the SBE and EU RED Level B assessment procedure, check supplier information, management documents, online databases, maps and available records for potential biodiversity values and features, and seek evidence of a site-specific pre-harvest inspection. Missing, outdated or conflicting information triggers further investigation and, where necessary, on-site inspection before acceptance.
Where evidence is missing and biodiversity values were expected, a site visit after clear-felling is unlikely to clarify the original conditions. The forest manager must provide a pre-harvest site inventory or demonstrate on site that high-value biodiversity elements were found (and safeguarded, see 2.1.2).
If adequate risk mitigation cannot be demonstrated, the biomass does not pass the SBE.

Monitoring and outcomes:

FORONEX BV draws on experience from its ongoing EU RED Level B assessments in France and first batch of SBE assessments. Experience to date shows that the mitigation procedure is practical and leads to clear acceptance or exclusion decisions.
Monitoring includes reviewing management plans, field inventories, harvesting permits and other supporting evidence, complemented by supplier discussions and site inspections where these potentially could resolve remaining questions. Assessment outcomes vary with the site conditions and the evidence available.
Discussions with FORONEX's French suppliers generally indicate a profound understanding of biodiversity and HCV protection, with some using specialist advisers on forest-management plans and applicable legal requirements.
The investigation is adapted to each sourcing area and the information available so that compliance can be assessed efficiently. Where insufficient or unclear information makes establishing compliance unreasonably time-consuming for the Sustainability Manager, the sourcing area is simply excluded (does not pass the SBE).

Country: France

Area/sub-scope: European area

Risk Assessment used:	
	☐SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.1.2 Threats to and impacts on the identified key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified and evaluated.	
Description of the specific risk:	
Specified Risk for: • Uncertified private forests • PEFC-certified private forests • TOF Landscape These categories may lack a site-specific assessment of how harvesting type, scale, timing and machinery could affect identified values. However, where field inspections under 2.1.1 demonstrate that relevant biodiversity values are absent, 2.1.2 can also be considered covered. In France, this risk particularly concerns uncertified private holdings below 20 ha without a voluntary management document (PSG, RTG or CBPS), especially where the harvesting operation does not trigger a formal environmental assessment. As mentioned under 2.1.1, reliance on INPN and ZNIEFF mapping without a pre-harvest site check can leave locally important biodiversity features unidentified. The potential impacts of harvesting may therefore remain unassessed. For TOF Landscape, impact assessments should identify measures to prevent the removal of old and valuable hedgerow trees such as pollarded trees, disruption of ecological corridors, unneeded damage to hedges due to harvesting, and disturbance during breeding periods. In its general benchmark of PEFC, SBP found that PEFC's indicators on assessing harvesting impacts on identified biodiversity features are less specific than those of SBP.	
Mitigation measure:	
Building on 2.1.1, a Remote-Inspection Checklist is completed for each sourcing area. Pre-harvest impact assessments and/or operational plans need to address the identified biodiversity values and the suitability of the proposed harvesting system, scale, timing and machinery. An adequate inventory alone does not demonstrate that operational impacts were evaluated. Supplier documents, reports and photographs can prove that appropriate protective measures were planned and applied. Missing, outdated or conflicting information triggers further investigation and, where necessary, on-site assessment before acceptance. After clear-felling, a site visit may no longer establish whether impacts were adequately assessed and	

managed. Pre-harvest assessments and implementation records are then required. If adequate risk mitigation cannot be demonstrated, the biomass does not pass the SBE.
Monitoring and outcomes:
The monitoring experience and outcomes described under 2.1.1 also apply to this indicator.

Country: France	
Area/sub-scope: European area	
Risk Assessment used:	
	☐SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.1.3 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.	
Description of the specific risk:	
Specified Risk for: • Uncertified forests outside protected areas • TOF Landscape outside protected areas Biodiversity values identified under 2.1.1 are not always conserved during harvesting and subsequent management. Clear-cutting, stand replacement or destructive maintenance can remove or degrade valuable habitats, trees and other ecological features, including Annex I habitats, or their key elements. For TOF Landscape, excessively frequent cutting, unsuitable equipment and removal of connected vegetation can degrade hedges, disrupt ecological corridors and cause tree mortality and landscape degradation. Where the assessment under 2.1.1 demonstrates that relevant high biodiversity values are absent, 2.1.3 is also Low Risk.	
Mitigation measure:	
Verify that management plans provide for the conservation and development of biodiversity values and HCVs, including Annex I habitats and their key elements. Harvesting and maintenance operations must	

correctly implement the measures established under 2.1.2 to minimise ecological impacts.
Site-dependent measures include for example retaining old native and cavity trees, protecting habitat structures and connected vegetation, and allowing sufficient recovery between interventions.
The implementation and conservation outcomes are checked using supplier reports, operational records and photographs, with an on-site inspection where needed.
Biomass does not pass the SBE if relevant biodiversity values were removed or degraded, or if adequate risk mitigation cannot be demonstrated.
This SBE indicator and the EU RED Level B assessment share the same requirement to conserve forest ecosystems with high biodiversity value. The SBE extends these conservation requirements to Trees Outside Forests - Landscape. However, the EU RED imposes additional sourcing restrictions by excluding biomass from certain No-Go areas; biomass from these areas remains ineligible regardless of the outcome of the SBE investigation.

Monitoring and outcomes:

The general monitoring experience described under 2.1.1 applies. Assessments are complemented by monitoring suppliers' performance during harvesting operations, as required by SBP in relation to EU RED Article 29(6)(b)(iv).
In practice, many current operations in France involve salvage harvesting following natural disturbances. These operations differ fundamentally from routine forest management because they come unexpectedly and the disturbance may already have destroyed the habitats and biodiversity values previously present. However, SBP does not exempt salvage harvesting from these requirements. The assessments can still distinguish damage caused by the disturbance from the effects of subsequent harvesting.

Country: France

Area/sub-scope: European area

Risk Assessment used:

☐SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim
☐SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim
☐SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim
☐SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed
☐SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim
☐SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed
☐SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed
☐SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed
☐SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim
☐SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim
☐SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim
☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim
☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim
☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim
☒ Biomass Producer's own risk assessment

Indicator with specified risk:

2.2.1 Feedstock shall not be sourced from land that had one of the following statuses in January 2008 and no longer has that status due to land conversion: a. Forests b. Wetlands c. Peatlands d. Highly biodiverse grasslands.

Description of the specific risk:
Specified Risk for all forest areas and TOF - Landscape; EU RED Level B assessment results prevail. France's forest area has increased around 9% since 2007 (through conversion). The conversion risk is limited, but concerns young stands that developed naturally or were planted after 2007 on previously valuable ecosystems, particularly non-protected semi-natural grasslands. Woody encroachment is currently observed in Alpine and wet grasslands. National policies and data indicate Low Risk for conversion of natural grasslands, wetlands and peatlands, but any indication of their current or past presence at a sourcing site triggers further investigation under this indicator and other indicators concerning the sustainable management of valuable ecosystems.
Mitigation measure:
For biomass from young stands established naturally or by planting after 2007, the sourcing area's land status in January 2008 is investigated. Historical land-cover maps, aerial photographs, management plans and online databases are reviewed to distinguish regeneration on existing forest land from woodland established through conversion of another ecosystem. Historical land status often cannot be proven from current tree cover alone, as former habitat features may no longer be visible. Possible conversion since 2007 of valuable forests to plantations, or conversion or deterioration of highly biodiverse grasslands, wetlands and peatlands, is investigated. Biomass is classified as non-compliant with the SBE where these changes are confirmed, or where operations involve, for example, further expansion of eucalyptus plantations in southern France, additional or intensified drainage of wetlands or peatlands, or destruction of hedges or other valuable landscape elements. In addition to being non-compliant with the SBE, wood harvested through the conversion of naturally regenerating forests into plantation forests, as defined by the EUDR (after 31 December 2020) does not meet EUDR requirements — even in EU countries. Sites are visited, where needed, to assess site conditions, including remaining habitat features and any drainage works or operational damage. Biomass from conservation or restoration of the original ecosystem may be accepted where the necessity of the work and achievement of its objectives are demonstrated. However, unconditional EU RED No-Go exclusions remain applicable in any case.
Monitoring and outcomes:
The general monitoring experience and exclusion approach described under 2.1.1 apply. Remote assessments using online databases and maps, complemented by site investigations where needed, have proved effective in establishing the history of valuable areas and assessing land-conversion risks. This provides a practical basis for determining whether the historical land status and subsequent changes allow sourcing areas to be accepted.

Country: France	
Area/sub-scope: European area	
Risk Assessment used:	
	☐SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed

	☐SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.2 Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.	
Description of the specific risk:	
Specified Risk for: • Uncertified private forests below 20 ha without a PSG, RTG or CBPS management document • TOF - Landscape In France, small private forests without a management document lack the systematic review of harvesting and regeneration provided through public-forest planning, compulsory private-forest plans or certification. Increasing drought, heat, pest and disease pressure exposes weaknesses in species selection and diversification. Regeneration that restores tree cover without addressing these weaknesses may leave future stands vulnerable and compromise long-term ecosystem functions. For TOF - Landscape, the 2023 French government review found that planting programmes had not reversed hedge decline. Excessively frequent cutting and unsuitable machinery cause hedge degradation. Destructive removal also disrupts ecological connections and reduces the soil protection, water regulation and habitat functions provided by hedges and other woody landscape features.	
Mitigation measure:	
Building on 2.1.1–2.1.3, the remote assessment verifies whether a pre-harvest site assessment was completed and whether harvesting and regeneration decisions maintain ecosystem health, vitality, functions and services. Species selection, diversification and regeneration methods are assessed against site conditions, expected climate change and disturbance risks. Management documents, supplier reports and photographs are reviewed. Site-dependent measures are checked, including retention of valuable trees, ground vegetation, unharvested areas and sufficient harvesting residues to maintain soil fertility and biodiversity. For TOF - Landscape, retention of root systems, regrowth capacity and connected vegetation is verified so that ecosystem functions can be maintained after the operation. Implementation is checked against operational records and photographs. Insufficient or conflicting evidence triggers further investigation and, where needed, a site inspection. The sourcing area is classified as non-compliant where operations fail to prevent lasting damage to soil fertility, water regulation or biodiversity, or where regeneration is not expected to produce a resilient forest stand. It is also rejected if further investigation cannot establish whether these functions have been maintained.	
Monitoring and outcomes:	
The general monitoring experience and exclusion approach described under 2.1.1 apply. Evidence of compliance can usually be gathered efficiently.	

The forestry cooperatives Alliance Forêts Bois and Unisylva assist small private owners with forest management and applicable legal requirements. Their experienced forestry specialists have been able to provide the required site assessments, silvicultural plans and operational records. This support has helped FORONEX assess compliance where individual small owners have limited technical capacity.

Country: France	
Area/sub-scope: European area	
Risk Assessment used:	
	☐SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.10 Harvested areas shall be regenerated	
Description of the specific risk:	
Specified Risk for: • Uncertified private forests below 20 ha without a PSG, RTG or CBPS management document • TOF - Landscape In France, small private forests without a management document fall outside systematic review of harvesting and regeneration. The statutory five-year regeneration obligation applies to clear-cuts exceeding departmental thresholds where natural regeneration is insufficient. Smaller operations may fall outside this requirement, while restoring tree cover alone does not demonstrate that the new stand will withstand future climatic conditions. Requirements introduced in May 2025 for publicly funded regeneration address site and future-climate suitability, including species diversification for planting projects of at least 4 ha. However, these funding conditions do not cover all privately financed regeneration. FSC and PEFC-certified small owners are excluded from this Specified Risk category because both schemes' regeneration requirements apply regardless of ownership size. The French Court of Auditors (Cour des comptes, 2024) identified outdated management documents and insufficient consideration of climate risks. A joint NGO review published by WWF France in 2023 also criticised insufficient diversification and the failure to distinguish stands requiring replacement from those	

that could be improved through silviculture. These weaknesses can perpetuate vulnerability to drought, pests and other disturbances.
For TOF - Landscape, continued hedge loss in France indicates that regrowth and replacement are not sufficiently secured. Destructive cuttings and damage to retained trees or soil can also prevent recovery.

Mitigation measure:

Building on 2.1.1–2.1.3 and 2.2.2, existing regeneration and proposed regeneration methods are assessed against site conditions, projected climate and disturbance risks. Species composition, protection against browsing and pests, the implementation timetable and responsibility for subsequent maintenance are checked.
Where existing stands can be improved through selective harvesting or enrichment planting, unnecessary clear-felling and complete replanting should be avoided. Proposed species mixtures and natural regeneration are assessed for their ability to establish a resilient stand. Re-establishment of a conifer monoculture is considered non-compliant unless evidence demonstrates that it is the only viable option under the site's environmental conditions.
For TOF Landscape, retained stumps, roots and trees are assessed for their capacity to regenerate. Normal coppicing and pollarding do not require individual replacement of every removed tree. Hedge destruction is classified as non-compliant. Any exception for unavoidable essential infrastructure requires documented justification, the necessary authorisations and evidence that approved compensatory planting has started. Supplier records, regeneration plans and photographs are reviewed; sites are inspected where further verification is needed. The sourcing area is classified as non-compliant where regeneration is unlikely to establish a resilient stand or restore the affected landscape element.

Monitoring and outcomes:

The general monitoring experience described under 2.1.1 applies. Regeneration assessments are practical but can be complex. Environmental conditions and the quality of regeneration plans matter, alongside the owner's ability to implement them.
Repeated destructive natural disturbances can leave small private owners with insufficient funds. Investments may have been lost several times before the stands reached maturity. A suitable regeneration plan therefore needs to be considered together with its realistic prospects of implementation.
The differences between salvage operations and routine forest management described under 2.1.3 are particularly relevant here. Considering both the proposed regeneration plan and the ability to carry it out provides a clear basis for the evaluation decision.

Country: France

Area/sub-scope: European area

Risk Assessment used:

	☐SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed

	☐SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.11 The impacts of natural processes such as fires, pests and diseases shall be managed.	
Description of the specific risk:	
Specified Risk for: • Uncertified private owners (with clearance obligations) • Small PEFC group members (with clearance obligations) France has established forest-health monitoring, fire-prevention and emergency-response systems. However, failure to carry out mandatory vegetation clearance (Obligations Légales de Débroussaillement) is a persistent problem. The French Senate reported completion rates often below 30% in 2022. Uncleared vegetation increases fire intensity and spread, threatens surrounding ecosystems and diverts firefighting resources towards protecting buildings. Reported causes include poor awareness among owners and difficulties for municipalities in applying enforcement procedures. In May 2026, the Government confirmed that these obligations remained insufficiently known and reported that 90% of houses destroyed in forest fires stood on uncleared or poorly maintained land. From January to August 2026, approximately 119 thousand ha (1.19 thousand km²) of forest was destroyed by wildfire in metropolitan France.	
Mitigation measure:	
The assessment inquires whether the supplying owner has mandatory vegetation-clearance obligations. Compliance is assessed at owner level, including obligations on land outside the sourcing plot. Verification can combine supplier information, operational records, dated photographs, official inspection findings and site visits. Relevant reports and stakeholder notifications are taken into account. Any indication of a breach is discussed with the land owner. Stakeholders are informed of this owner-level exclusion policy and asked to cooperate. If a breach is confirmed on any land for which the owner is responsible, all biomass from that owner is classified as non-compliant, including material from other plots. Acceptance resumes only after the required clearance has been completed.	
Monitoring and outcomes:	
Biomass sourcing regularly takes place after forest fires as part of salvage operations. Following the severe fires in France, awareness of vegetation-clearance obligations has increased among forest owners and the general public. The cooperative support described under 2.2.2 helps small owners address management and legal requirements. The general monitoring and exclusion approach under 2.1.1 and the salvage considerations under 2.1.3 apply. Post-fire sourcing does not remove the need to establish compliance with the owner's vegetation-clearance obligations.	

Country: France	
Area/sub-scope: European area	
Risk Assessment used:	
	☐SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
3.2.2 Primary feedstock shall not be sourced from forest areas where site productivity is low and, according to local definitions or norms, the areas are classified as low-productive or difficult to regenerate.	
Description of the specific risk:	
Specified Risk for all forest ownership and certification categories. France has no single national classification covering all low-productive or difficult-to-regenerate forests. Relevant areas include vulnerable mountain forests, forests on shallow or unstable soils and wooded wetlands or peatlands. In the Alps, Pyrenees and Mediterranean mountains, slow growth, erosion and difficult regeneration can make biomass-driven harvesting incompatible with ecosystem functioning and protection against avalanches, rockfall and torrential flooding. Removing residues can also increase nutrient loss and soil damage on vulnerable sites. Legal protection and mountain-restoration programmes do not cover every vulnerable forest. Reviews also report insufficient funding and delayed renewal of ageing protection forests. New access roads can expose previously inaccessible stands to harvesting pressure. Examples documented in the SBE include access development at Saint-Gervais-les-Bains, insufficient larch regeneration at Péone and slow-growing high-mountain forests in Écrins National Park. These findings require site-specific assessment and do not exclude entire regions. Neither FSC nor PEFC certification cover this indicator in a direct manner.	
Mitigation measure:	
The assessment reviews supplier information, management documents, online databases and maps, including evidence examined under indicators 2.1.1–2.1.3 and the EU RED Level B assessment. It establishes the source location and land-cover type. Where low productivity or difficult regeneration may be the case, it checks local classifications, growth and regeneration capacity, soil type, protective functions and the purpose and method of harvesting. Where the main operations have already taken place, available pre-harvest assessments, photographs and	

operational records are reviewed to establish the original conditions and the effects of harvesting. Any remaining residue collection is also assessed for soil damage and nutrient loss. Missing, outdated or conflicting information triggers further investigation. A site inspection is undertaken only when there are still open questions and where it could (possibly) resolve unclarities.
Where young trees are harvested from land that became wooded after 2007, historical land status is always checked (see indicator 2.2.1).
Biomass-driven exploitation of low-productive or difficult-to-regenerate forests does not pass the SBE. This includes commercial harvesting in vulnerable high-Alpine forests and wood production on peatland. However, these ecosystems are not automatically unconditional No-Go areas. Biomass arising as a residue from limited maintenance or restoration operations may be accepted where the harvesting was demonstrably necessary to conserve or restore the ecosystem. This does not apply to primary or old-growth forests or other unconditional EU RED No-Go areas. Where the SBE and EU RED assessments both apply, the stricter result prevails. If eligibility remains uncertain, the biomass does not pass the SBE.

Monitoring and outcomes:

The general monitoring experience and outcomes described under 2.1.1 apply. The experience with obtaining management records under 2.2.2 and assessing regeneration under 2.2.10 is particularly relevant where low productivity or difficult regeneration may affect sourcing eligibility. The salvage wood considerations under 2.1.3 can also apply.

Country: France

Area/sub-scope: European area

Risk Assessment used:

☐SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim
☐SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim
☐SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim
☐SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed
☐SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim
☐SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed
☐SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed
☐SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed
☐SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim
☐SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim
☐SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim
☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim
☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim
☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim
☒ Biomass Producer's own risk assessment

Indicator with specified risk:

3.2.3 feedstock shall not be sourced from forest areas in the Supply Base which, according to local definitions or norms, are classified as having combined attributes of high carbon stocks and high conservation value (HCV).

Description of the specific risk:

Specified Risk for:

• All forest ownership and certification categories • TOF - Landscape and Urban France’s inventories and protection measures do not identify or safeguard every forest combining "high carbon stocks and HCVs". Relevant stands occur in public and private forests, including outside protected areas. For example, maps of "ancient-forests" establish continuity of forest land use, but do not establish current stand biodiversity value or its density. Relevant TOF examples include ancient hedgerow trees, mature riparian woodland and old native woodlands in parks. In 2023, the regional scientific council CSRPN Grand Est reported that the region lacked an inventory of old-growth forests meeting the European Commission’s definition. Protected-area rules and certification can permit harvesting, including maintenance operations in Old-Growth Forests (OGFs), although biomass from primary forests and OGFs is excluded under EU RED. In other forests combining high carbon stocks and HCVs, legally permitted operations may reduce carbon stocks or damage conservation values.
Mitigation measure:
Building on 2.1.1–2.1.3, maps, historical and current aerial photographs, stand descriptions and habitat inventories are reviewed to establish whether high carbon stocks and HCVs occur together or were present before harvesting. Annex I habitats, protected species and natural forest structures trigger closer investigation. Natura 2000 information and management records are checked. Biomass from primary and old-growth forests is classified as non-compliant, including biomass from safety, maintenance or conservation operations. Other unconditional EU RED No-Go exclusions also apply. Outside these areas, limited maintenance or conservation operations may supply compliant biomass where management plans and their implementation maintain carbon stocks over the medium term and demonstrably contribute to conserving biodiversity values and HCVs. Planned removals, expected growth and regeneration, and measures protecting the identified values are assessed. Pre-harvest assessments, operational records and photographs are investigated. Sites are visited where further verification is needed. The same assessment applies to TOF - Landscape and Urban areas. Where the required conservation of high carbon stocks and HCVs cannot be demonstrated, the area is classified as non-compliant.
Monitoring and outcomes:
The general monitoring experience under 2.1.1 and the findings on establishing land-use history under 2.2.1 apply. Biodiversity information, forest-management records and historical evidence support the evaluation of sourcing areas with possibly both high carbon stocks and HCVs. Salvage operations are subject to the considerations described under 2.1.3.

Country: France	
Area/sub-scope: European area	
Risk Assessment used:	
	☐SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim

	☐SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
3.3.1 Feedstock sourcing shall be in compliance with the principles of cascading use, high quality stem wood shall not be used as feedstock if it is in substantial demand for long-lived products in the Supply Base.	
Description of the specific risk:	
The Specified Risk applies to all areas and biomass. Energy demand may divert stemwood from long-lived products. This is a documented risk in France. France Stratégie, the French government's strategic analysis and policy-advice agency, reported that, of approximately 57 million m³ harvested in 2021, 68% ultimately entered energy use, including household firewood and processing residues, while only 21% entered long-lived products. Commercial wood-energy volumes had doubled over the preceding decade, while sawlog and industrial-wood volumes declined. Public support for wood energy can enable energy users to outbid material processors, including panel manufacturers, for usable primary wood. The 2025 Senate review confirmed that competition intensified during the 2022–2023 energy-price crisis, when wood was sometimes purchased for energy at higher prices than for industrial processing.	
Mitigation measure:	
FORONEX BV serves several wood-processing markets and prioritises customers manufacturing long-lived products. A higher price alone does not justify diversion to the energy market. Biomass sourcing focuses on harvesting residues and damaged or salvage wood unsuitable for material use. Each assortment is assessed using supplier information and grading records. Usable stems, also from salvage operations, are first offered to wood processors. Suitability is assessed by wood quality; demand is related to the assortment, location and period concerned. Where processing markets are saturated, low-grade stemwood may be redirected to the biomass sector, if no suitable material outlet is available and large volumes need to be salvaged.	
Monitoring and outcomes:	
FORONEX BV has long supplied primary, secondary and tertiary wood residues and wastes to a broad range of customers and industries. Regular contact with wood processors and stable, long-term business relationships provide practical knowledge of wood quality requirements and market demand. This experience helps FORONEX identify suitable material outlets and apply the cascading principle in its sourcing and sales decisions. Maintaining these relationships is essential for our long-term commercial objectives and is central to the mitigation procedure for this indicator.	

4 Stakeholder engagement

4.1 General description

Biomass Producer's stakeholder engagement start date: 01 Nov 2022

Biomass Producer's stakeholder engagement end date: 23 Feb 2026

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:

Stakeholder engagement
Our company has engaged a wide range of stakeholders since its founding and continues to do so daily. Our Stakeholder Engagement Plan and Comments, Complaints, and Feedback Procedure are available upon request. To date, no comments have been received, directly or indirectly, in relation to our SBP certification.

Supply Base Evaluation Belgium
In 2022, the SBE development project was led by Rens Hartkamp, director of BiomassConsult and Andy Vandenberghe, Certification Manager at FORONEX BV.
Mr. Hartkamp (M.Sc. Forestry; Ph.D. Economics) has 25 years of experience in forest certification and 15 years in biomass certification. He has played a key role in benchmarking and developing criteria and indicators for biomass certification schemes. As the first consultant involved with SBP, he has supported over 200 companies in achieving certification. He passed the SBP auditor exams in 2015. He launched the first SBE for Portugal, which has since been widely adopted. In January 2024, BiomassConsult's REDII Level A report for Wallonia was approved.
Mr. Vandenberghe has a background in accountancy and nearly 40 years of experience in the forest and wood sector. Mr. Vandenberghe is skilled in identifying forest habitats, tree species, and, for example, wood from different tree species. He is responsible for managing the PEFC and SBP certification systems at FORONEX BV.
The Supply Base Evaluation process consisted of a literature study and consultations with experienced specialists. Considered were relevant policies, public authorities, laws and regulations, enforcement, as well as official databases, critical reports of non-governmental organizations, mass media publications, etc.
During the development process, several specialists were consulted for their views. Subsequently, our company distributed the SBE to 36 stakeholders and individuals with practical experience in the Belgian biomass sector, representing economic, social, and ecological interests. The stakeholders were contacted by email in Dutch, French, and/or English at the beginning of November 2022. Additionally, the SBE was publicly available online for two months prior to the SBP audit. The Public Service of Wallonia submitted a list of corrections and improvements, all of which were incorporated.
The developed mitigation measures were tested in practice, after which the procedures and template assessment documents were further improved and audited. In 2023, the procedures entered into force, and many evaluations have since been carried out. Experience gained is integrated into the procedures at least once a year. During the years of SBE implementation, the views of many specialists have been considered. Most confirmed the correctness of the approach, and only minor adjustments have been made since. In 2025, the SBE was updated to reflect new legislation and a renewed review of critical publications.

EU RED Level B - France (metropolitan), Flanders and Wallonia
Foronex BV uses the EU RED Level B reports for France, Flanders, and Wallonia developed by BiomassConsult.

BiomassConsult 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 several months. The additional consultation round yielded no comments, it was formally closed on 17 August 2025.

Supply Base Evaluation France

The SBE for metropolitan France was launched in 2026, led by Rens Hartkamp and Andy Vandenberghe, whose qualifications and responsibilities are described above under SBE Belgium.

The assessment followed the Belgian approach, reviewing policies, legislation, enforcement, official databases, scientific publications and critical reports against SBP Standard 1 v2.0. Risk mitigation procedures were developed to address the findings for France, drawing on Foronex's practical experience in implementing the SBE for Belgium and the EU RED assessments for Flanders, Wallonia and France.

The SBE and a summary table of the results for each criterion were made publicly available on the BiomassConsult website for stakeholder consultation for one month until 23 September 2026. Requests to comment on the SBE were sent to 54 stakeholders, covering public authorities, research institutes, environmental organisations, industry associations, trade unions and companies in the forest, wood and biomass sectors. No comments were received.

4.2 Response to stakeholder comments

5 Report updates and approval

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

The SBE for France has been added.

Name	Rens Hartkamp
Title	Consultant
Date of report approval	24 Sep 2026

Name	Andy Vandenberghe
Title	Report author
Date of report approval	24 Sep 2026

Name	Handrin Wemel
Title	Management representative
Date of report approval	24 Sep 2026

Annex 1: Detailed findings for Supply Base Evaluation indicators

Belgium European area	Indicator
1.1.1	Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.
Supply Base Verifiers	• Review of applicable laws and regulations, national and regional policy frameworks. • Identification of institutional roles and oversight functions. • Law-enforcement, implementing regulations, relevant programs. • Critical weblinks and data. Flanders: Forest Decree 1990 https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1003183¶m=informatie Flanders: Forest Compensation and Statistics (2020 Annual Report ANB) https://publicaties.vlaanderen.be/view-file/68494 Flanders: Besluit erkenning exploitanten 2002 (Recognition of harvesting companies) https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1003183¶m=informatie Wallonia: Code forestier (Décret du 15 juillet 2008) https://environnement.wallonie.be/legis/dnf/forets/foret025.htm Wallonia: Décret modificatif du 16 avril 2020 (Art. 57) https://www.ejustice.just.fgov.be/eli/decret/2020/04/16/2020040928/moniteur Wallonia: Code des droits d'enregistrement, d'hypothèque et de greffe https://www.ejustice.just.fgov.be/eli/loi/2004/12/13/2004022797/justel Brussels-Capital Region: Code forestier and regional forest authority https://leefmilieu.brussels Nature areas and forest management in Brussels https://environnement.brussels/citoyen/nos-actions/projets-et-resultats/gestion-des-reserves-naturelles-et-forestieres-bruxelles?highlight=gestion%20foresti%C3%A8re News article on illegal felling cases and legal commentary (HLN) https://www.hln.be/binnenland/geen-sprake-van-illegale-boomkap-door-vlaamse-overheid~a27247d7 News article on felling without permit (VRT NWS) https://www.vrt.be/vrtnws/nl/2022/04/21/tientallen-bomen-in-steenokkerzeel-gekapt-zonder-vergunning Forest compensation updates (Equal Partners) https://www.equal-partners.eu/en/news/forest-compensation-flanders Forest dashboard and spatial data tools https://www.bosteller.be Decreet Natuurbehoud (Flanders) https://codex.vlaanderen.be/Portals/Codex/documenten/1005915.html Codex Ruimtelijke Ordening (Flanders)

	https://codex.vlaanderen.be/Portals/Codex/documenten/1018245.html Wallonia: Code du Développement Territorial (CoDT) https://territoire.wallonie.be/fr/codt See also indicators 1.1.2, 1.1.3, 1.1.4.
Risk Rating justification	In Belgium, approximately 55% of the forest area is privately owned, with more than 100,000 individual owners managing parcels averaging 2.5 hectares. These private forests are managed either directly by the owners, by professional managers, or through cooperatives. Forest governance is regionally organised, with each of the three regions having its own legal framework and implementing agency. Flanders: Forest governance is based on the Forest Decree (1990) and the Nature Decree (2014), implemented by the Agentschap voor Natuur en Bos (ANB). Wallonia: Governed by the Code Forestier (2008), amended by the decree of 16 April 2020 (modifying article 57 of the 15 July 2008 decree), enforced by the Département de la Nature et des Forêts (DNF). Brussels-Capital Region: Applies the same Code Forestier as Wallonia, with implementation by Leefmilieu Brussel (BIM). Flanders The formal definition of forest under the 1990 Forest Decree includes lands where trees and woody shrub vegetation dominate and fulfil ecological, recreational, or production functions. All forests larger than 5 hectares must have a forest management plan. Public forests and private forests within the Flemish Ecological Network must submit an elaborate version. These plans are valid for 20 years and must align with the integrated forest and nature management framework introduced by the 2014 Nature Decree. About 33% of the forest area is currently covered by such plans. Forest and nature management are orientated towards reaching the European and regional conservation objectives for species and habitats. This includes an integrated 'forest and nature management plan' and integrated 'criteria for sustainable forest and nature management'. All forest harvesting requires a permit. Even small groups of trees (KLEs) fall under regulation via the Nature Decree and Vegetation Decree, with location-specific permissions needed. KLEs are mapped in the Biological Valuation Map (BWK). The ANB conducts compliance checks, including field inspections of harvesting plots, to ensure consistency with approved management plans. Harvesting companies must have tax registration and official recognition if they extract more than 50 m³/year. Wallonia Forests are defined broadly under the 2008 Code Forestier to include wooded areas and related ecological features such as marshes and fauna feeding zones. Management plans are mandatory for public forests larger than 20 hectares, but optional for private forests. Still, large private landowners and conservation NGOs often develop them voluntarily. Draft plans undergo public consultation and require approval by the DNF. Since 2023, formal

	evaluation of these plans is mandatory for public forests, in accordance with the Walloon decree of 16 April 2020 (amending article 57 of the decree of 15 July 2008). Harvesting in public forests requires a permit. Within public forests an environmental (harvesting) permit by the forest administration is required. However, on private lands, mostly a permission from the landowner suffices. On private land outside the forest zone (in agricultural or green zones as defined in spatial plans) an urban planning permit from the municipal services is obligatory. The DNF performs inspections to verify compliance and checks whether operations align with approved management pans, laws and regulations. Small landscape elements are identified in Wallonia. They are not specifically defined as such, as in Flanders, but are protected under several rules. In Wallonia, forest fragmentation is lower, and many such small elements are already covered by management plans. A mapping and permit system exists to regulate changes, and Wallonia actively promotes the preservation of these elements. Brussels region Forests in Brussels are few but include significant areas like parts of the Sonian Forest. The region applies the same Code Forestier as Wallonia, and management is under Leefmilieu Brussel (BIM). Forests are managed with a focus on conservation and public accessibility. The legal structure and enforcement mechanisms mirror those in Wallonia. Enforcement and Compliance Across all regions, forest and nature administrations conduct inspections of harvesting activities. They verify that logging is within boundaries, uses approved haulage tracks and stacking areas, and follows the permit conditions. Large-scale destructive management operations (clearcutting) are not permitted in Belgium. For example, under article 38 §1 of the Forest Code in Wallonia, it is prohibited to clear-cut more than 5 hectares in stands comprised of more than 50% conifer species (based on basal area) and 3 hectares in stands with more than 50% broadleaved species. Nature reserves and protected areas are managed under approved plans with regular compliance monitoring. Applications for permits are reviewed against legal criteria, and field verifications are routine. Enforcement structures are in place, though implementation capacity can vary. Forest owners need to comply with national, provincial and local legislation. The forest owner groups ('Bosgroepen' in Flanders / 'Groupements forestiers' in Wallonia) assist in navigating the complexities involved. These groups normally have an forest management plan. Regarding law enforcement and harvesting permits, some, such as members of the Flemish political party Groen, have raised concerns about too soft procedures on dealing with offenders. To cut a large tree, or group of trees on any kind of land, it is required to request a harvesting permit. If one gets caught, the punitive measure is, however, merely the obligation to regenerate

	the trees, although the trees will be of less value than the previous ones for many decades. Moreover, the offender can also start a 'regularisation process' him/herself, after being caught. This process legalises the harvest retrospectively (this issue is therefore not addressed in indicator 1.3.1 on illegal wood). The regularisation process normally results in the obligation to compensate for the forest area. The compensation obligation can, for example, also require the establishment of trees with a certain diameter, making the operation costly. Although this can indeed be considered a loophole in the legal system, the sum of the areas effected is relatively small (around 45 ha in 2020) and the topic is currently being addressed. The politicians raising this concern are also of the opinion that harvesting permits are given too easily in Flanders. The 2020 annual report of the Agency of Nature and Forest of Flanders, however, indicates that for the first time in 5 years there is no deficit in forest compensation: more forest had been compensated than had been converted. In Flandres there is the ambition to add 10.000 ha of forest between 2019 and 2030, currently (2025) they realised 2.128 ha new forest and 717 hectares of compensation forest. See also indicators 1.1.2, 1.1.3, 1.1.4. Trees Outside Forests (TOF) – Landscape and Urban Feedstock Note: If an indicator is also applicable to TOF – Landscape and Urban Feedstock, additional information is provided at the end of the findings. Indicators that apply only to landscape feedstock (not to urban or infrastructure feedstock) are identified as such in the section headings. In the three regions of Belgium, landowners are responsible for managing non-forest parcels and biomass-related maintenance activities. The regional authorities in Flanders, Wallonia, and Brussels oversee that these activities comply with applicable laws and regulations. They issue permits, verify land-use classifications and management operations, and enforce legal requirements through instruments such as the Decreet Natuurbehoud and Codex Ruimtelijke Ordening in Flanders, and the Code du Développement Territorial (CoDT) in Wallonia. These frameworks include strict rules for felling trees outside forests and require traceability of harvested biomass. In Flanders, compensating for the harvesting trees is often demanded. Belgium has a strong legal system, supported by a high level of governance. In Flanders, for tree felling outside designated forest areas the Nature Conservation Decree mandates that individuals or entities intending to remove small groups of trees, known as "kleine landschapselementen" (small landscape elements), must obtain an environmental permit and, in many cases, are required to compensate for the loss. Compensation typically involves replanting trees or implementing other ecological measures to offset the environmental impact. The specific requirements and procedures for felling small groups of trees outside forest areas in Flanders vary by location and depend on the characteristics of the trees concerned. Enforcement and interpretation of these rules fall under the authority of the local municipality and the Agency for Nature and Forests.

	Comment Foronex Although, considering Belgium, the indicator is low risk, our company only works with officially registered harvesting teams and requires that the harvesting teams check if an approved harvesting plan, a "harvesting authorisation", or a "urbanise permit" is present. This can also apply to the harvest of a small groups of trees outside forests. Areas without an approved management plan or permit are avoided. Our company sources exclusively from legally registered businesses with valid VAT numbers, ensuring compliance with applicable laws and regulations.
Risk Rating	Low Risk

France **European areas**	**Indicator**
1.1.1	Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.
Supply Base Verifiers	Legislation and regulations - Forest Code (Code forestier) - Environmental Code (Code de l'environnement) - Labour Code (Code du travail) - Urban Planning Code (Code de l'urbanisme) - Rural and Maritime Fishing Code (Code rural et de la pêche maritime) - Civil Code (Code civil) URLs Légifrance — consolidated French legislation and Codes — https://www.legifrance.gouv.fr/liste/code?etatTexte=VIGUEUR CNPF — reduction of the PSG threshold to 20 ha — https://ifc.cnpf.fr/actualites/abaissement-du-seuil-des-psg-20-ha Ministry of Agriculture — technical instruction on forest controls — https://info.agriculture.gouv.fr/boagri/instruction-2015-371/telechargement CGAAER–IGEDD — evaluation of the 2021–2025 State–ONF contract — https://www.vie-publique.fr/files/rapport/pdf/300241.pdf Chatham House — Forest Governance and Legality: France https://forestgovernance.chathamhouse.org/countries/france Service-Public / Civil Code — planting, boundary and neighbour rules — https://www.service-public.fr/particuliers/vosdroits/F614 Environmental Code — protection and sustainable management of hedges, Articles L.412-21–L.412-28 — https://www.legifrance.gouv.fr/codes/id/LEGISCTA000051372207 Cerema — protection of roadside avenues and tree alignments — https://outil2amenagement.cerema.fr/outils/la-protection-des-allees-et-alignements-darbres-bordant-les-voies-ouvertes-la-circulation Cerema — Espaces boisés classés covering parks, individual trees, hedges and alignments — https://outil2amenagement.cerema.fr/outils/lespace-boise-classe-ebc

	Service-Public — when cutting or felling a garden tree requires permission — https://www.service-public.fr/particuliers/vosdroits/F31473
Risk Rating justification	• SBP benchmark: FSC — sufficiently covered; PEFC — sufficiently covered. • Trees Outside Forests: applicable in both Landscape and Urban categories. • SBE France: Low Risk for all ownership and certification categories. Public forests are managed and monitored by ONF. Private forests with management plans are supervised through CNPF and DDT(M). Smaller private forests and Trees Outside Forests have fewer planning requirements, but remain subject to legal requirements concerning harvesting, environmental protection, worker safety and waste, etc, with law enforcement by competent authorities. Findings generally indicate compliance. The Supply Base covers all thirteen regions of metropolitan France: Auvergne-Rhône-Alpes, Bourgogne-Franche-Comté, Brittany, Centre-Val de Loire, Corsica, Grand Est, Hauts-de-France, Île-de-France, Normandy, Nouvelle-Aquitaine, Occitanie, Pays de la Loire and Provence-Alpes-Côte d'Azur. Overseas departments and territories and imported biomass are excluded. The Supply Base includes forest and other wooded land. IGN reported 17.6 million ha of metropolitan forest in 2024. Earlier FAO data used for this assessment recorded 0.843 million ha of other wooded land in 2020 and 0.524 million ha of temporarily unstocked or recently regenerated forest in 2015; temporarily unstocked areas remain classified as forest where forest cover is expected to return. Approximately 75% of the forest is privately owned, 9% belongs to the State and 16% to municipalities and other public bodies. Private ownership dominates particularly in western and southern France, whereas communal and other public forests are more prominent in the east and State forests are relatively more frequent in northern France. SBP defines Trees Outside Forests as trees on land not defined as forest under national legislation. Classification therefore depends on the status of the land under the applicable national legal framework, not solely on whether its current tree cover meets the statistical forest definition of the Food and Agriculture Organization of the United Nations (FAO), as applied in France by the Institut national de l'information géographique et forestière (IGN). In France, this is not a purely cadastral distinction. The Forest Code does not provide one area-based legal definition of forest. The forest administration determines the actual wooded state and forest destination of the land from factual and historical evidence. Cadastral entries and planning designations provide relevant information but do not determine Forest Code status by themselves. A temporarily unstocked area remains forest where its forest destination is maintained after harvesting, fire or storm. Conversely, long-established woodland on land still recorded as agricultural in the cadastre cannot automatically be classified as TOF; its actual wooded state and forest destination must be assessed under French forest law. IGN applies a separate statistical definition for national forest inventories: an area of at least 0.5 ha and 20 m wide, with more than 10% tree cover, trees capable of reaching 5 m and no predominantly agricultural or urban land use. This definition often overlaps with the legal assessment but does not replace it. Small woods and communal coppices are therefore not TOF merely

	because they fall below the IGN area threshold. Once non-forest status has been established, SBP Instruction Document 1A determines the TOF category. TOF Landscape includes small wooded areas, windbreaks and shelterbelts, hedgerows and trees along lakes and streams. TOF Urban includes trees in gardens and parks, along streets, roads, railways, power lines and other infrastructure, and on construction sites. Orchards, vineyards, nut trees, other woody crops, agroforestry and woody energy crops belong to the separate TOF Agricultural-land category (not in scope of this SBE). The EU RED Bridging Requirements use these SBP categories to determine the applicable EU RED requirements; they do not replace the national forest-status assessment. Policies and laws French feedstock sourcing is governed by several complementary codes rather than one biomass-legality act. The Forest Code establishes forest policy, sustainable-management documents, harvesting controls and forest offences. The Environmental Code regulates protected species and areas, water, waste, land clearance, hedges and roadside trees. The Labour Code governs occupational health and safety, while planning, rural, transport, tax and commercial law apply according to the operation. Ownership, legal harvesting and trade, payments and illegal activities are examined in more detail under indicators 1.1.2–1.1.5. Obligations differ systematically by ownership, property size and location. Public forests subject to the “régime forestier” are managed under ONF planning documents. In private forests, the PSG threshold was reduced from 25 to 20 ha in 2023; newly covered holdings without a valid sustainable-management document had to submit a PSG by 12 July 2026, while specified longer-valid RTGs and CBPSs remain transitional until July 2028. Smaller private forests without these documents are not exempt from harvesting, environmental, safety or waste law. Forest-management documents do not normally govern TOF Landscape and Urban sources. These sources nevertheless remain subject to the applicable Civil, Environmental, Urban Planning and Labour Codes, together with safety, waste and trade rules. Roadside tree alignments receive specific protection under Article L.350-3 of the Environmental Code. Since March 2025, national rules have also regulated hedge destruction while permitting normal sustainable maintenance and biomass use. These hedge provisions exclude roadside alignments and hedges enclosing or situated inside residential gardens and parks, which remain subject to separate rules. Municipalities administer planning controls; prefectures and DDT(M) coordinate State approvals; OFB investigates environmental offences; and CAP authorities enforce BCAE requirements. Relevant institutes and law enforcement The Ministry of Agriculture and its DGPE set national forest policy. DRAAF and DDT(M) services implement and control it regionally and departmentally. ONF manages public forests; CNPF approves and monitors private-forest management documents. DREAL and the French Biodiversity Office (OFB)

	cover environmental requirements. Prefects and municipalities exercise defined planning and fire-prevention functions, while the Labour Inspectorate supervises worker-safety law. Police, gendarmerie, customs and the courts address criminal and trade offences. Forest Code Articles L161-4–L161-7 authorise designated public agents to investigate and record forest offences. The State's forest-control instruction requires multiannual, risk-based control programmes and annual reporting. Controls include management-document implementation, cutting authorisations, regeneration obligations and other identified local priorities. Performance in practice and critical reviews The legal framework is implemented through ownership-specific institutions. Practically all of state-forest area and other public-forest areas subject to the "régime forestier" had an applicable management plan. Certification adds an audited management layer, but on thin indicator the Low Risk conclusion is not limited to certified forests. The SBE review found no frequent or structural non-compliance affecting feedstock sourcing as a whole. Two identified exceptions are assessed under the more specific indicators: gaps in current public-forest planning are addressed under 1.1.3, and poor implementation of mandatory vegetation clearance in fire-risk zones under 2.2.11. These specific issues do not change the general Low Risk conclusion for 1.1.1. External governance indicators support the general Low Risk conclusion. In Transparency International's 2025 CPI, France scored 66/100 and ranked 27th of 182 countries, one point below 2024. In the World Bank's latest WGI, France's 2024 scores were 74.7 for Government Effectiveness, 72.9 for Regulatory Quality, 73.8 for Rule of Law and 72.5 for Control of Corruption. These broad indicators support generally reliable administration and enforcement but do not exclude individual infringements.
Risk Rating	Low Risk

France European areas	**Indicator**
1.1.2	Legal ownership of land and resource use rights shall be respected.
Supply Base Verifiers	Legislation and regulations - Civil Code (Code civil) - Forest Code (Code forestier) - General Code of Public Property (Code général de la propriété des personnes publiques) - Decree No 55-22 of 4 January 1955 reforming land registration URLs Service Public — obtaining a copy of a title deed — https://www.service-public.fr/particuliers/vosdroits/F2618 Service Public — obtaining land and property information — https://www.service-public.fr/particuliers/vosdroits/F17759

	Service Public — formal boundary determination (bornage) — https://www.service-public.fr/particuliers/vosdroits/F3037 French cadastral map — https://www.cadastre.gouv.fr/scpc/accueil.do Géoportail — cadastral, land-cover and aerial mapping — https://www.geoportail.gouv.fr Service-Public / Civil Code — planting, boundary and neighbour rules — https://www.service-public.fr/particuliers/vosdroits/F614
Risk Rating justification	• SBP benchmark: FSC — sufficiently covered; PEFC — sufficiently covered. • Trees Outside Forests: applicable in both Landscape and Urban categories. • SBE France: Low Risk for all ownership and certification categories. Private forest ownership is documented through title deeds, and state forest ownership through classification acts. Parcels and boundaries are recorded in the national cadastre. Third-party management and use rights require legally binding agreements. Forest boundaries are established and ownership disputes are rare. Policies and laws The Civil Code treats forests and land as immovable property and defines ownership, accession, usufruct, use, servitudes and possession. Article 544 recognises the owner's right to use and dispose of property subject to laws and regulations; Articles 546–552 link natural products and standing trees to the landowner. Transfers of forest land are recorded through authentic acts and land-registration procedures. Public forests are additionally governed by the General Code of Public Property and the Forest Code. A title deed and the land-registration record establish the legal basis of ownership. The cadastre identifies fiscal parcels and is a practical mapping reference, but it does not replace the title deed or a formal boundary survey. Where precise boundaries are disputed, neighbouring owners can agree a formal boundary demarcation (bornage); failing agreement, the court determines the boundary, which is then marked on the ground. Regarding TOF Landscape and Urban, the SBP classification concerns land status and does not establish ownership or harvesting rights. The same property and use-right rules apply to both categories. Rights over the trees can belong to a private landowner, adjoining owners jointly, a municipality or other public authority, or an infrastructure owner or manager. Civil Code rules govern boundary hedges and trees, joint ownership, overhanging branches and neighbour disputes. Third-party harvesting, management and access require a valid legal basis, such as ownership, usufruct, a management mandate, timber-sale contract, lease, servitude or cutting right. The harvesting or maintenance contract must identify who owns or manages the trees, who authorised the operation and who may dispose of the resulting wood. The cadastral matrix identifies the recorded owner and the cadastral plan identifies the parcel. The title deed or

	another valid right, mandate or contract confirms the authority to harvest and dispose of the resulting wood. Relevant institutes and law enforcement Notaries prepare and authenticate property transfers. DGFiP's land-registration services record notarial acts and provide property information; the cadastre and Géoportail support parcel identification. Surveyors establish formal boundaries. ONF documents public-forest ownership and management authority, while CNPF and DDT(M) verify the applicant's status or mandate when processing private-forest management documents and cutting applications. Civil courts determine ownership, boundary and contractual disputes. Administrative courts hear disputes involving public property or administrative decisions. Amicable agreement, mediation and formal boundary procedures are available before or instead of litigation. Performance in practice and critical reviews France has nationwide land-registration and cadastral systems, and ownership evidence is normally available through the owner, notary or land-registration service. Forest fragmentation, indivision and outdated contact details can make the current decision-maker harder to identify on some small properties, but these practical complications do not create a general failure to recognise ownership. The review found no evidence that ownership or resource-use rights are frequently or structurally violated in metropolitan forestry. Boundaries are generally established, disputes are exceptional relative to the number of forest properties, and legal remedies are available. The indicator is therefore Low Risk for public and private forests and for Trees Outside Forests, irrespective of certification status.
Risk Rating	Low Risk

Belgium European area	**Indicator**
1.1.2	Legal ownership of land and resource use rights shall be respected.
Supply Base Verifiers	• Review of legal and policy frameworks and their practical application • Collection of publications and data • Analysis of critical positions Belgian Civil Code – Book III: Property https://www.ejustice.just.fgov.be/eli/wet/2020/02/04/2020020347/justel Farm Lease Law – Wet van 4 November 1969 https://www.ejustice.just.fgov.be/cgi_loi/change_lg.pl?language=nl&la=N&cn=1969110431&table_name=wet https://www.ejustice.just.fgov.be/cgi_loi/article.pl?language=nl&lg_txt=n&cn_s

	earch=2023101313 Standardized Model Contracts for Farm Leases https://www.comptoir-foncier.be/en/farm-leases-new-model-contracts-for-private-and-public-landlords/ Rural Flanders Requests Clarification on Property Law https://www.brusselstimes.com/184001/rural-flanders-asks-for-clarification-on-property-law Forest Code – Walloon Region https://chemins.be/codeforestier Forest Decree – Flanders (Chapter IX, Article 51; Article 12) https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1003183¶m=inhoud&ref=search&AVIDS= Nature Conservation Decree – Flanders (Articles 12septies, 12octies, 12novies) https://codex.vlaanderen.be/Portals/Codex/documenten/1005915.html DLA Piper – Overview of Belgian zoning and planning legislation https://www.dlapiperrealworld.com/law/index.html?c=BE&s=legislation-and-planning-zoning-controls&t=zoning INBO Report (2022) – Short Rotation Coppice in Belgium https://purews.inbo.be/ws/portalfiles/portal/86623123/Desair_etal_2022_ShortRotationCoppiceInBelgium.pdf INBO Report (2024) – Integration of Short Rotation Coppice in Belgian Agricultural Landscapes https://purews.inbo.be/ws/portalfiles/portal/116167351/Desair_etal_2024_TheIntegrationOfShortRotationCoppiceBelgianAgriculturalLandscapes.pdf
Risk Rating justification	In Belgium, legal frameworks and control systems ensure the legality of land use and the ownership of harvested wood across all three regions: Flanders, Wallonia, and the Brussels-Capital Region. Forest operations are subject to regulations, and any illegal activities are typically detected and reported promptly by landowners, neighbours, or other stakeholders — partly due to Belgium's high population density and widespread public access to forests. The prevalence of recreational use further enhances this vigilance, as does routine patrolling by forest and nature administration agencies. Belgian civil and forest laws clearly delineate rights concerning forest use, providing a solid foundation for the enforcement of legality and ownership rights. Key legislative instruments include: - Book 3 'Property' of the Civil Code: Defines property rights, including customary rights and the procedures for resolving land ownership disputes in court. - Farm Lease Law – Wet van 4 November 1969 and amendments: Governs lease agreements for land use, with region-specific adaptations. Walloon Region: In 2021, standardised model contracts were introduced to promote written lease agreements between private and public parties. These help clarify rights and obligations and encourage transparent, consistent lease arrangements. Land ownership disputes are rare in Belgium. The legal system provides sufficient means to resolve such incidents through established judicial procedures. A reliable land registry system records all titles and rights and

	serves as a definitive legal reference. Land-use rights are identified and clear (including customary rights). On a national level are issued: the cadastre plan of lots/allotments, property certificate with survey plan (attachment to the notarial deed), and business registrations (company foundation document). Lease contracts specify land use without transferring ownership and are legally binding. If a land owner rents out land, this is recorded in a lease contract, stipulating the right to use the land according to the contract. In Belgium, more than 58% of forest stands are privately owned. Lease agreements for forest plots are a common practice, and a transparent system of interaction between land owners and loggers has evolved. In September 2021, Landelijk Vlaanderen raised concerns about Belgium's reformed property law, which allows individuals to access neighbouring land under specific conditions, such as retrieving lost items. The law, however, lacked clarity leading to fears of trespassing on fields and forests. Despite assurances from the Ministry of Justice that agricultural land is exempt, Landelijk Vlaanderen has called for a revision of the law to protect property rights. The law's vague language also affects forests, prompting calls for clearer descriptions. Trees Outside Forests – Landscape and Urban Feedstock In Belgium, the management of trees in urban and landscape settings is governed by regional legislation, with each of the three regions—Flanders, Wallonia, and Brussels—having distinct legal frameworks. Municipalities are responsible for implementing these regulations and may establish additional local rules. For instance, in Flanders, the Nature Decree and the Flemish Public Planning Code regulate tree protection and land use planning. Land use planning regulations outline the limits of possible interventions on lands, including the maintenance of dangerous trees or the removal of vegetation. These regulations ensure that property owners' rights are protected while allowing necessary management of outdoor spaces. Regarding willow trees, which are common in Belgian landscapes, there has been increased interest for energy plantations, but these are out of scope of the SBE.
Risk Rating	Low Risk

Belgium European area	**Indicator**
1.1.3	Feedstock shall be legally harvested, supplied and produced, including in compliance with CITES, EUTR and other applicable legal trade requirements.
Supply Base Verifiers	• Review of applicable laws and regulations • Legal and policy frameworks, their application, law enforcement • International ratings websites • Red lists: CITES, IUCN and red lists of the Belgian regions (not only trees) • Analysis of recent, reliable, and critical publications online

	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) 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 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. Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) -Washington, 3 March 1973. CITES protected tree species: https://checklist.cites.org/#/en WWF – EU Forest Crime Initiative: Belgium GAP Analysis https://www.wwf.de/fileadmin/fm-wwf/Publikationen-PDF/EU-Forest-Crime-Initiative-Belgium-GAP-Analysis.pdf LiveEO – EU Deforestation Regulation (EUDR) Competent Authorities (incl. Belgium) https://www.live-eo.com/article/eudr-competent-authorities---updated-list Greenpeace Belgium – EU Calls Out Belgium Over Illegal Timber Imports https://www.greenpeace.org/belgium/nl/persbericht/1493/illegaal-hout-eu-roept-belgie-op-het-matje/ De Morgen – EU Starts Procedure Against Belgium Over Illegal Timber Trade https://www.demorgen.be/nieuws/europa-start-procedure-tegen-ons-land-in-strijd-tegen-illegale-houthandel~b7c86fd7/ World Bank – Worldwide Governance Indicators https://www.worldbank.org/en/publication/worldwide-governance-indicators/interactive-data-access Transparency International – Corruption Perceptions Index 2024 (Belgium) https://www.transparency.org/en/cpi/2024/index/bel Regulation (EU) 2023/1115 on deforestation-free products https://eur-lex.europa.eu/eli/reg/2023/1115/oj Application of EUDR Regulation on deforestation-free products delayed until December 2025 https://trade.ec.europa.eu/access-to-markets/en/news/application-eudr-regulation-deforestation-free-products-delayed-until-december-2025 See also indicators 1.1.1, 1.1.2 and 1.1.4.
Risk Rating justification	See also indicators 1.1.1, 1.1.2 and 1.1.4. In general, Belgium has an excellent governance score according to the

	World Bank Governance Index. In 2023, on a range from -2,5 to +2,5, Belgium scored 1.3 on 'rule of law' (relative score 88.21%, considering all nations), and 1.34 on ‘control of corruption’ (relative score 89,15%). Considering the Corruption Perception Index (CPI) of Transparency International, Belgium also has a good score (69 out of 100 points), it ranks on place 22 out of 180 countries (2024). EUTR/EUDR The EU Timber Regulation (EUTR), in force since 2013, aims to prevent illegally harvested timber from entering the EU market (also from EU countries). Operators must conduct due diligence to confirm legality, maintaining transparent records. This regulation will be replaced by the more comprehensive EU Deforestation Regulation (EUDR: EU Regulation 2023/1115), which entered into force in June 2023 and becomes applicable from December 2025 (June 2026 for smaller enterprises). Under EUDR, products must not be associated with deforestation or forest degradation occurring after 31 December 2020. For primary wood harvested in Belgium, practical compliance requirements are similar — due diligence and traceability remains crucial, but now operators will also need to provide geolocation data. Belgium’s amendments to its Product Standards Law are intended to support the implementation and enforcement of the EUDR. Both the EUTR (EU Timber Regulation) and the new EUDR (EU Deforestation Regulation) are enforced centrally at the federal level by the same organisation: the Federal Public Service Health, Food Chain Safety and Environment (FPS Health). In both cases, the FPS Health collaborates with customs authorities and other relevant bodies to oversee compliance. The Service investigates wood trade, in collaboration with customs offices, and can start procedures on prosecuting and sanctioning companies. Most wood from public forests in Belgium is sold by the regional forest administrations in public 'standing stock' sales. This has as a consequence that the forest administrations are not considered as 'operators' under the EUTR. Instead, the companies harvesting and selling the wood have the responsibility to comply with the regulation. The Flemish Agency for Nature and Forests has made a brochure for managers of nature areas and forests (and harvesting companies) on how to comply with the EUTR. CITES The CITES rules have been implemented in Belgian (federal) legislation. The official authority dealing with CITES is the Federal Public Service ‘Health, Food Chain Safety and Environment’ - Directorate General ‘Animal, Plant and Nutrition’ - Office for Animal Welfare and CITES. In Belgium, forest management policy and implementation is under the responsibility of regional authorities. Legislative acts have been developed and put into practice aimed at controlling the legal harvest of wood. For Belgium, CITES and IUCN list many flora and fauna species that need protection. CITES currently does not list any tree species for Belgium. The IUCN Red List identifies two tree species requiring conservation attention: the

	Service Tree (Sorbus domestica), classified as Vulnerable, and the European White Elm (Ulmus laevis), classified as Critically Endangered. Belgium, has adopted a Red List classification of species in accordance with the criteria of the International Union for Conservation of Nature (IUCN). The forests are biodiverse and comprise of habitats for many wild animals and plants. The red-list species are protected through forestry and environmental legislation and regulations. Additionally, there are several kinds of protected areas which take into account the presence of (endangered) species of high biodiversity value. Belgium has tree national parks and a total of 1915 protected areas. A large part of the protected areas are Natura 2000 sites. Species protected in Belgium under EU law are protected under the Habitats Directive and the Birds Directive. The Habitats Directive has a total of 281 species on its list for Belgium, of which 65% have a poor or bad conservation status. The Birds Directive lists 255 species. 3 species are unique for Belgium. Since this SBE covers primary wood from Belgium only, aspects related to managing the import of primary wood or wood residues from abroad are not relevant. Compliance with CITES regulations at Belgian border crossings is monitored by Belgian Customs in collaboration with the Federal Agency for the Safety of the Food Chain (FASFC). Our internet research did not find significant critical publications concerning the implementation of the EU Timber Regulation (EUTR) and CITES regulations specifically related to primary wood harvested in Belgium. There are general publications on the EUTR's impact, including enforcement challenges and recommendations for improvement, but they do not highlight specific issues pertaining to Belgium's primary wood sector. Similarly, studies on CITES implementation focus on global or regional contexts without singling out issues related to Belgium's primary wood production. In 2017, the European Commission initiated infringement proceedings against Belgium for insufficient enforcement of the EU Timber Regulation (EUTR), which aims to prevent illegal timber from entering the EU market. Belgium was given two months to address these concerns. However, publicly available information does not detail the outcome of this specific case. Greenpeace and later WWF have investigated and criticized Belgium’s weak inspections and lack of sanctions despite significant timber imports from high-risk countries. At the time, Belgium's inspections were managed by only one part-time official. In 2023, the Commission opened an infringement proceedings against Belgium for failing to fully transpose the Renewable Energy Directive into national law, indicating ongoing challenges in meeting EU environmental obligations. Trees Outside Forests (TOF) – Landscape and Urban Feedstock The same applies to landscape and urban feedstock. In Belgium, tree felling and biomass sourcing from areas outside designated forests are subject to regional regulatory frameworks covering legal compliance, sustainability, and environmental protection (see 1.1.1 and 1.1.2). Commercial harvesting of wood from Trees Outside Forests (TOF) is also subject to the EUTR and

	EUDR.
Risk Rating	Low Risk

France **European areas**	**Indicator**
1.1.3	Feedstock shall be legally harvested, supplied and produced, including in compliance with CITES, EUTR and other applicable legal trade requirements.
Supply Base Verifiers	Legislation and regulations - Forest Code (Code forestier) - Environmental Code (Code de l'environnement) - Regulation (EU) No 995/2010 (EU Timber Regulation / EUTR) - Regulation (EU) 2023/1115 (EU Deforestation Regulation / EUDR) - Regulation (EU) 2025/2650 amending the EUDR application dates - Council Regulation (EC) No 338/97 on trade in protected species - Commission Regulation (EC) No 865/2006 implementing Regulation No 338/97 URLs Légifrance — consolidated French legislation and Codes — https://www.legifrance.gouv.fr/liste/code?etatTexte=VIGUEUR EUDR consolidated text, Regulation (EU) 2023/1115 — https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:02023R1115-20251226 Ministry of Agriculture — EU Timber Regulation — https://agriculture.gouv.fr/le-reglement-sur-le-bois-de-lunion-europeenne DRAAF Bretagne — EUDR application from 30 December 2026 — https://draaf.bretagne.agriculture.gouv.fr/le-rdue-une-nouvelle-reglementation-europeenne-pour-lutter-contre-la-a3548.html Ministry for Ecological Transition — CITES implementation — https://www.ecologie.gouv.fr/politiques-publiques/commerce-international-especes-sauvages-cites CGAAER–IGEDD — evaluation of the 2021–2025 State–ONF contract — https://www.vie-publique.fr/files/rapport/pdf/300241.pdf Chatham House — Forest Governance and Legality: France — https://forestgovernance.chathamhouse.org/countries/france EUR-Lex — Regulation (EU) No 995/2010 (EUTR) — https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32010R0995 Environmental Code — protection and sustainable management of hedges, Articles L.412-21–L.412-28 — https://www.legifrance.gouv.fr/codes/id/LEGISCTA000051372207 Rural Code / CAP conditionality — retention and seasonal cutting rules for hedges and trees — https://www.legifrance.gouv.fr/codes/id/LEGISCTA000046864533 Cerema — protection of roadside avenues and tree alignments — https://outil2amenagement.cerema.fr/outils/la-protection-des-allees-et-alignements-darbres-bordant-les-voies-ouvertes-la-circulation Cerema — Espaces boisés classés covering parks, individual trees, hedges

	and alignments — https://outil2amenagement.cerema.fr/outils/lespace-boise-classe-ebc Service-Public — protected-species derogations and habitat controls — https://entreprendre.service-public.fr/vosdroits/F38791
Risk Rating justification	• SBP benchmark: FSC — sufficiently covered; PEFC — sufficiently covered. • Trees Outside Forests: applicable in both Landscape and Urban categories. • SBE France: Low Risk for all ownership and certification categories. No CITES-listed tree species are present is France. The EUTR currently applies and the EUDR applies from 30 December 2026 (for this product category). Forty EUTR inspections of operators handling timber harvested in metropolitan France during 2017–2019 identified no violations. The REDII Level A report for France (2023) concluded low risk on this topic as well. Policies and laws The Forest Code links lawful harvesting to the applicable management document or cutting authorisation. Public-forest harvests are implemented through the “régime forestier” and ONF procedures. In private forests with a PSG, scheduled cuts may normally be advanced or delayed by up to four years; other extraordinary cuts require CNPF authorisation. Where the Forest Code requires a management guarantee or specific authorisation, harvesting outside it is an offence and can be stopped, with timber and equipment subject to seizure. Environmental permits and restrictions remain applicable in addition to forest authorisation. Regulation (EU) No 995/2010 (EUTR/RBUE) prohibits the first placing on the EU market of illegally harvested timber and requires operators to maintain due diligence covering species, quantity, country or region of harvest, supplier and legal compliance. Regulation (EU) 2023/1115 (EUDR/RDUE), as amended by Regulation (EU) 2025/2650, applies from 30 December 2026 to the relevant timber operators and adds geolocation, legality and deforestation-free requirements. Transitional EUTR provisions continue for specified legacy timber. The EUTR remains in force. French operational guidance provides that, for timber sold by ONF from public forests or by a recognised professional forest manager from private forests, confirmation of that status can be sufficient to establish negligible legality risk together with the required product information. For timber purchased directly from other private owners, the operator obtains more detailed legality evidence; an owner declaration annexed to the harvesting or purchasing contract is an accepted method. Operators retain their due-diligence records for five years. These EUTR requirements continue until the EUDR becomes applicable and remain relevant during the transition for specified legacy timber. CITES trade is implemented in the EU through Regulations (EC) No 338/97 and No 865/2006. CITES permits and certificates are enforced through

	environmental and customs law. No tree species naturally occurring in metropolitan French forests is listed for CITES-controlled timber trade. Regarding TOF Landscape and Urban, lawful harvesting depends on the legal status of the tree, its location and the proposed operation. Legal harvesting requires compliance with any prohibition, declaration, authorisation, seasonal restriction or compensatory-planting requirement arising from protected-species and habitat rules; PLU/PLUi designations, including classified wooded areas (Espaces boisés classés); protected sites and historic monuments; national hedge-destruction rules; and the specific protection of roadside avenues and tree alignments. CAP hedge conditions apply where the feature forms part of an agricultural holding. EUTR due diligence applies when timber within its product scope is first placed on the EU market. In case of TOF legality evidence comprises the source and species, the owner's or manager's authority, and any declaration, permit or exemption required for the operation. Relevant institutes and law enforcement The Ministry responsible for forests is the competent authority for EUTR controls of operators placing timber harvested in France on the market. DRAAF and DDT(M) services undertake controls; ONF and CNPF provide the management and authorisation framework. Customs, the Ministry for Ecological Transition, DREAL and OFB address imported products, environmental offences and CITES requirements. Police, gendarmerie and prosecutors can act where criminal offences are suspected. Forest Code enforcement powers are set out in Articles L161-4–L161-7. EUTR operators can be inspected after placing timber on the market and must present their due-diligence system and records. Under the EUDR, competent authorities will use declarations, risk analysis and inspections under the revised EU framework. Performance in practice and critical reviews The 2023 REDII Level A assessment recorded 40 EUTR inspections during 2017–2019 of operators handling timber harvested in metropolitan France, with no violations identified; later controls focused more strongly on imported timber, where the recognised risk is higher. Governance and forest-legality reviews found no frequent or structural illegal-harvesting problem in metropolitan France. Today, nearly all public-forest area subject to the "régime forestier" have an applicable management plan. Delays may occur during ONF preparation, municipal consideration or State approval, and some municipalities have resisted entry into the regime because of cost and reduced autonomy. Neither situation results in illegal harvesting: only a cut undertaken without the management basis or specific authorisation required for that operation is illegally.
Risk Rating	Low Risk

France European areas	Indicator
1.1.4	Payments for harvest rights and feedstock, including duties, relevant royalties and taxes related to timber harvesting shall be complete and up-to-date.
Supply Base Verifiers	**Legislation and regulations** General Tax Code (Code général des impôts) Book of Tax Procedures (Livre des procédures fiscales) Commercial Code (Code de commerce) Forest Code (Code forestier) Social Security Code (Code de la sécurité sociale) URLs French tax administration — forestry income regime — https://bofip.impots.gouv.fr/bofip/3587-PGP.html/identifiant=BOI-BA-SECT-10-20240612 CNPF — forestry taxation — https://www.cnpf.fr/se-former-s-informer/droit-et-fiscalite/fiscalite-forestiere Service Public — mandatory invoice information — https://entreprendre.service-public.fr/vosdroits/F31808 INPI — National Register of Enterprises — https://www.inpi.fr/ressources/formalites-dentreprises/registre-national-entreprises DATA INPI — public company-registration data — https://data.inpi.fr/ National Assembly — undeclared firewood sales and taxation — https://www.assemblee-nationale.fr/dyn/13/questions/QANR5L13QE110764 Service-Public / Civil Code — planting, boundary and neighbour rules — https://www.service-public.fr/particuliers/vosdroits/F614
Risk Rating justification	• SBP benchmark: FSC — sufficiently covered; PEFC — partially covered. • Trees Outside Forests: applicable in both Landscape and Urban categories. • SBE France: Low Risk for all ownership and certification categories. No royalties, stumpage fees or other volume-based charges apply to timber harvesting. In general, the sector conducts transactions against invoices and pays all applicable business taxes. VAT must be stated on invoices. Not invoiced and undeclared sales occur mainly in the domestic firewood market. Commercial-scale instances are very seldom. Straight-forward mitigation measures are common practise in the sector. Policies and laws French forest owners may be subject to property tax on woodland, the cadastral forestry-income regime, VAT according to status and activity, and duties on property transfers. Forestry businesses are also subject to the general tax, accounting, payroll and company-registration requirements applying to their legal form. France does not impose a separate royalty, statutory stumpage fee or volume-based harvesting charge comparable to a concession payment; the price paid for standing or roadside timber is a

	commercial purchase price. Commercial Code Article L441-9 requires invoicing for purchases made for a professional activity. Tax legislation defines invoice and VAT requirements. Professional suppliers must be registered in the National Register of Enterprises, while public timber sales operate through ONF sale and accounting procedures. Transactions with non-professional owners still require sufficient written evidence for the purchase and tax treatment. Relevant institutes and law enforcement DGFiP administers and controls income tax, corporate tax, VAT and property taxes. Customs addresses relevant cross-border and indirect-tax matters; URSSAF controls social contributions. INPI operates the National Register of Enterprises and publishes company-registration information. ONF administers public timber sales and receipts, while notaries and land-registration services record forest-property transfers and associated duties. Tax and accounting records can be audited, with administrative and criminal sanctions available for fraud, false invoicing or undeclared business activity. Registration, invoice and bank records provide mutually supporting evidence of the supplier, transaction, beneficiary and payment. Performance in practice and critical reviews Formal forestry and biomass transactions are normally documented by contracts, delivery records and invoices and paid through bank accounts. Undeclared cash sales are reported mainly in small domestic firewood transactions. The review found no evidence that non-payment of applicable taxes or charges is frequent or structural in the commercial feedstock sector. Several established business practices are applied by nearly all companies in the sector and reduce the risk of illegal transactions. The certificate holder conducts supplier due diligence, verifies company registration and bank-account ownership, and makes payments only against invoices to accounts held in the supplier's name. These controls address the limited gap reflected by PEFC's Partial benchmark result. Regarding TOF Landscape and Urban, entitlement to the resulting wood and the related payment arrangements depend on ownership and the harvesting or maintenance contract. The wood can be sold by the owner, transferred to the contractor or retained by the contractor as part of its remuneration. The contract and, where applicable, the invoice must clearly record this allocation and any associated payment. Operations involving municipal or other publicly owned trees must also comply with public-procurement, accounting and asset-disposal rules. VAT, income and business-tax obligations depend on the seller and transaction; this kind of biomass is not exempt because it originates from pruning, safety work or landscape maintenance.
Risk Rating	Low Risk

Belgium European area	Indicator
1.1.4	Payments for harvest rights and feedstock, including duties, relevant royalties and taxes related to timber harvesting shall be complete and up-to-date.

Supply Base Verifiers	• Review of applicable laws and regulations • Legal and policy frameworks, their application, law-enforcement • Internet research on payment issues in Belgian forestry • Analysis of recent, reliable, and critical publications online Crossroads Bank for Enterprises (CBE) https://economie.fgov.be/en/themes/enterprises/crossroads-bank-enterprises Registration in the Crossroads Bank for Enterprises (CBE) https://economie.fgov.be/en/themes/enterprises/crossroads-bank-enterprises/registration-crossroads-bank VAT – Registration, Change, and Cancellation of Activity | FPS Finance https://finance.belgium.be/en/enterprises/vat/declaration/registration-change-cancellation-activity Federal Public Service Finance – VAT Regulations https://finance.belgium.be/en/enterprises/vat Federal Public Service Economy – Business Regulations https://economie.fgov.be/en World Bank – Worldwide Governance Indicators https://www.worldbank.org/en/publication/worldwide-governance-indicators/interactive-data-access Transparency International – Corruption Perceptions Index 2024 https://www.transparency.org/en/cpi/2024/index/bel Preferred by Nature – Timber Risk Assessment: Belgium https://www.preferredbynature.org/sites/default/files/library/2018-12/NEPCon-TIMBER-Belgium-Risk-Assessment-EN-V1.3.pdf Legal Systems in Belgium – Thomson Reuters Practical Law https://uk.practicallaw.thomsonreuters.com/w-019-2986 Litigation & Dispute Resolution – ICLG https://iclg.com/practice-areas/litigation-and-dispute-resolution-laws-and-regulations/belgium Litigation 2025 – Belgium – Chambers and Partners https://practiceguides.chambers.com/practice-guides/litigation-2025/belgium Research Guide to Belgian Law – GlobaLex https://www.nyulawglobal.org/globalex/belgium1.html Conducting Litigation in Belgium – Lexology https://www.lexology.com/library/detail.aspx?g=469d1ac9-01c6-4ec0-bec4-424f18a17015 Civil Law in Belgium – Lawyers Belgium https://lawyersbelgium.com/civil-law-in-belgium Judicial Systems Belgium – EATJN https://www.eajtn.com/judicial-systems/belgium
Risk Rating justification	Belgium ranks highly on the World Bank Governance Index and performs well on the Corruption Perceptions Index (CPI) published by Transparency International, reflecting strong institutional quality and low levels of corruption. The country has a transparent and well-enforced tax system, supported by a solid legal framework governing payments. Forest legislation is regionally determined, with Flanders, Wallonia, and Brussels each having their own regulations. While Belgium does not impose

	timber-specific royalties, it applies corporate income tax, collects stumpage fees, and may require reforestation contributions. VAT applies to all timber sales, but it is not a cost between VAT-registered companies. Regional forest administrations are responsible for collecting harvesting-related fees. Entities involved in timber activities, both individuals and companies. must pay income or corporate taxes. They are required to keep detailed accounting records, retain financial data for at least seven years, and file annual tax returns. Standardised digital systems and data-sharing mechanisms enable effective tax oversight, leaving little room for evasion or error. All timber-related businesses must be registered with the Crossroads Bank for Enterprises (CBE), which serves as the central government registry of all businesses and self-employed persons in Belgium. Despite its name, the CBE is not a financial institution, but a public administrative database managed by the Federal Public Service Economy, the authority responsible for business registration, trade regulation, and market oversight. Registration in the CBE is mandatory before starting any economic activity. The process is handled through accredited business counters. Each business receives a unique enterprise number used for all official interactions with public authorities, including tax and social security. In addition to CBE registration, companies must also be registered with the Tax Office, and depending on their legal form and sector, may need to register with the Chamber of Commerce. These registrations ensure full legal recognition and integration into Belgium's administrative system. Companies must comply with strict VAT regulations, including issuing correct invoices, maintaining structured and traceable financial records, and submitting VAT returns. It is legally required to state VAT on all invoices. The Federal Public Service of Finance oversees compliance. Enforcement is considered effective and the system allows little space for error. In Flanders, any company harvesting more than 50 m^3 of timber per year must obtain official recognition from the forest administration. This requirement ensures compliance with legal obligations related to taxation, employment, safety, and business conduct. While individual civil disputes may occur, there is no substantial evidence of widespread lawsuits between forest harvesting companies and their clients in Belgium. The judicial system is robust and well-equipped to resolve such cases when they arise. Trees Outside Forests (TOF) – Landscape and Urban Feedstock The same applies to TOF Urban and landscape feedstock. Comment Foronex Foronex only fulfils payments on basis of invoices via a bank transfer. Cash payments would compromise and complicate material balances, financial administration and tax assessments.
Risk Rating	Low Risk

Belgium	**Indicator**

European area	
1.1.5	There shall be adequate protection of the Supply Base from unauthorised and illegal activities, such as illegal logging, mining, and encroachment.
Supply Base Verifiers	• Review of applicable laws and regulations • Legal and policy frameworks, their application, law-enforcement • Analysis of recent and critical publications Forest Decree (Bosdecreet), Flanders https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1003183¶m=informatie Code forestier, Wallonia http://environnement.wallonie.be/legis/menucode.htm Ordonnance relative à la forêt, Brussels https://leefmilieu.brussels/themas/natuur-en-biodiversiteit/bescherming-van-de-natuur/wetgeving-bescherming-van-de-natuur Agentschap voor Natuur en Bos (ANB), Flanders https://www.natuurenbos.be/over-het-anb Département de la Nature et des Forêts (DNF), Wallonia https://environnement.wallonie.be/home/legislation/nature-et-forets.html Brussels Environment (Leefmilieu Brussel) https://leefmilieu.brussels/ Flemish Nature Inspectorate – Handhavingsrapporten https://www.natuurenbos.be/publicaties/publicaties/handhavingsrapporten Wallonia – Strategy against environmental crime https://www.wallonie.be/fr/actualites/delinquance-environnementale-entree-en-vigueur-du-nouveau-decret Belgium Governance Indicators – World Bank https://databank.worldbank.org/source/worldwide-governance-indicators Transparency International – Corruption Perceptions Index https://www.transparency.org/en/countries/belgium Publications Vlaanderen – General enforcement overview https://publicaties.vlaanderen.be/view-file/68633
Risk Rating justification	In Belgium, the protection of the supply base from illegal activities such as unauthorised logging, mining, or encroachment is regulated through regional forest laws: the Forest Decree in Flanders, the Code forestier in Wallonia, and the Ordonnance forêt in Brussels. Enforcement is managed by the regional forest administrations (ANB, DNF, and Brussels Environment), which oversee permitting, conduct field inspections, and impose administrative fines when necessary. Serious violations are prosecuted under the Belgian Penal Code, with cases handled by the public prosecutor. Investigations may be conducted by officially authorised forestry inspectors, often in cooperation with the police or specialised environmental enforcement officers. Courts can impose fines, order the confiscation of timber, or apply other legal penalties. Unauthorised activities such as illegal logging, mining, and encroachment are rare in Belgium, as land boundaries are clearly defined by the central cadastre system. In general, harvesting teams and local landowners have no

	interest in jeopardising their reputation or legal standing. Nonetheless, occasional cases may occur, typically due to a company's misunderstanding of permitting requirements. If encroachment happens, it is likely a limited offence by mistake. Such cases are successfully solved between the parties, either by negotiations, or in court. In Belgium there are several out-of-court mechanisms to solve such activities. Local societies and civilians are attentive and ready to inform the landowner. Notifications of unauthorised activities, sometimes prove to legal after all. In case illegal activities are encountered, the (public or private) landowner can submit the offence, and an investigation will start. Dependent on the case, could be involved, for example, inspectors of the regional forest and nature administration, the Flemish Nature Inspection, the Investigation Unit for Serious Crime of Wallonia, and/or the police. At the municipalities there are employees ready to help. The justice system is considered to be working properly. Belgium has a good governance score according to the World Bank Governance Index, and scores low on corruption according to Transparency international. Since the supply base is defined as Belgium as a whole, rather than a specific area belonging to an individual landowner, this indicator largely overlaps with the general legality indicators 1.1.1, 1.1.2, and 4.2.5. Indicator 4.1.9 specifically addresses mechanisms for resolving grievances and disputes. Comment Foronex Foronex routinely requests the legal basis for conducting harvests and has, in some cases, identified missing permits. The situation is then investigated in cooperation with the relevant authorities, and the timber is not accepted until legal compliance is established.
Risk Rating	Low Risk

France European areas	**Indicator**
1.1.5	There shall be adequate protection of the Supply Base from unauthorised and illegal activities, such as illegal logging, mining, and encroachment.
Supply Base Verifiers	**Legislation and regulations** Forest Code (Code forestier) Environmental Code (Code de l'environnement) Mining Code (Code minier) Urban Planning Code (Code de l'urbanisme) Civil Code (Code civil) Penal Code (Code pénal) URLs OFB — environmental police powers and activity — https://ofb.gouv.fr/police-de-environnement

	French Senate — 2025 ministerial response on timber theft — https://www.senat.fr/questions/base/2025/qSEQ250404321.html Fransylva — reporting and support for timber theft and fraud — https://www.fransylva.fr/vol-escroquerie-en-foret.html UFC-Que Choisir — critical reporting on organised timber theft — https://www.quechoisir.org/actualite-trafic-de-bois-de-plus-en-plus-de-vols-d-arbres-coupes-sur-pied-n165608/ Chatham House — Forest Governance and Legality: France — https://forestgovernance.chathamhouse.org/countries/france Reporterre — critical reporting on illegal firewood cutting — https://reporterre.net/Bois-de-chauffage-de-plus-en-plus-de-coupes-illegales
Risk Rating justification	• SBP benchmark: FSC — sufficiently covered; PEFC — sufficiently covered. • Trees Outside Forests: not applicable. • SBE France: Low Risk for all forest ownership and certification categories. The Forest Code authorises designated agents to investigate forest offences in public and private forests. Timber theft is reported less than 500 times a year (for metropolitan France). Detected cases are addressed through established enforcement procedures and the judicial system. A critical review of independent sources did not find a structural issue in the field of illegal mining or encroachment. Policies and laws Unauthorised cutting is addressed through the Forest Code's management, cutting and offence provisions. Theft of standing or felled timber falls under the Penal Code definition of theft, while receiving stolen timber is also punishable. Illegal land clearance, destruction of protected habitats, unlawful occupation and unauthorised mining are regulated through the Forest, Environmental, Urban Planning, Mining and Penal Codes according to the activity and site. Public forests are protected through the "régime forestier" and ONF management. Private owners retain responsibility for protecting their property and may appoint professional forest managers, experts or cooperatives. Legal powers exist to stop unauthorised operations, record offences, seize material or equipment where authorised, recover damages and bring cases before the courts. Relevant institutes and law enforcement Forest Code Articles L161-4–L161-7 identify agents authorised to investigate and record forest offences. ONF agents perform surveillance and forest-police functions in public forests. DRAAF and DDT(M), OFB inspectors, police and gendarmerie, mining and environmental inspectors, customs and municipal authorities act within their respective competences. Judicial investigations proceed under the prosecutor, with criminal and civil remedies available. OFB has administrative and judicial environmental-police powers and reports

	approximately 140,000 controls and 6,000 judicial investigations annually across its full environmental remit. This is broader than forestry, but demonstrates an established national enforcement structure available for habitat destruction, unlawful works and related forest offences. Performance in practice and critical reviews Reported timber theft remains below 500 cases a year in metropolitan France. Media and owner organisations describe individual firewood thefts and occasional organised or high-value tree theft, including on small private properties. Detected cases have led to investigation, prosecution, imprisonment, fines and compensation. These incidents require attention but remain isolated relative to the national forest area and timber sector. Illegal logging, illegal mining and encroachment are not frequent or structural problems in the Supply Base. France's property-registration, forest-management and enforcement systems enable detected cases to be investigated and resolved. The risk is low for all forests, irrespective of ownership or certification, and does not apply to Trees Outside Forests.
Risk Rating	Low Risk

France European areas	**Indicator**
2.1.1	Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.
Supply Base Verifiers	Legislation and regulations Environmental Code (Code de l'environnement) Forest Code (Code forestier) Council Directive 92/43/EEC on habitats and species Directive 2009/147/EC on the conservation of wild birds National Biodiversity Strategy 2030 Applicable regional forest-management schemes and protected-area instruments URLs INPN — national natural heritage inventories and protected-area data — https://inpn.mnhn.fr Géoportail — national mapping and aerial imagery — https://www.geoportail.gouv.fr Ministry for Ecological Transition — Natura 2000 network — https://www.ecologie.gouv.fr/politiques-publiques/reseau-europeen-natura-2000 OFB — terrestrial habitats and biodiversity structures — https://ofb.gouv.fr/les-milieux-terrestres EEA — Habitats Directive Article 17 reporting — https://nature-art17.eionet.europa.eu/article17/ IGN — biodiversity indicators for French forests —

	https://foret.ign.fr/IGD/en/indicateurs/critere4 FSC — National Risk Assessment for France — https://connect.fsc.org/document-centre/documents/resource/186 Service-Public — protected-species derogations and habitat controls — https://entreprendre.service-public.fr/vosdroits/F38791 Ministry for Ecological Transition — Trame verte et bleue — https://www.ecologie.gouv.fr/politiques-publiques/trame-verte-bleue OFB/IGN — national bocage monitoring system — https://ofb.gouv.fr/pays-de-la-loire/dispositif-nationale-de-suivi-des-bocages-dsb
Risk Rating justification	• SBP benchmark: FSC — sufficiently covered; PEFC — partially covered. • Trees Outside Forests: applicable in the Landscape category. • SBE France: Low Risk for FSC-certified forests; Specified Risk for uncertified private forests, PEFC-certified private forests and TOF Landscape. RED Level B results prevail where applicable. Specified Risk applies to uncertified private forests and Trees Outside Forests, and to PEFC-certified private areas. PEFC France requires owners to identify high ecological-value areas at property level, but not a pre-harvest assessment covering the full HCV and possible important new biodiversity elements. General mapping may omit newly occurring species, microhabitats or unprotected ZNIEFF features at operational level. Policies and laws Indicator 2.1.1 is the first of three linked biodiversity indicators. It addresses identification and documentation; 2.1.2 examines threats and operational impacts; 2.1.3 examines whether the identified values are maintained or enhanced. France identifies biodiversity through the Environmental and Forest Codes, the EU Habitats and Birds Directives, protected-area designations, Natura 2000, ZNIEFF inventories, Red Lists, forest inventories and management documents. The Environmental Code protects designated areas, protected species and their breeding or resting sites and implements environmental assessment and Natura 2000 procedures. National parks, nature reserves, biological reserves, biotope-protection orders, Natura 2000 sites, wetlands and other mapped features identify many HCVs. ZNIEFF is an expert inventory rather than a prohibition by itself, but it is a central warning layer for operational assessment. France currently has 57 Ramsar wetlands covering approximately 3.9 million ha, including metropolitan and overseas sites. Four WWF Global 200 ecoregions occur partly within metropolitan France: European–Mediterranean Montane Mixed Forests; Mediterranean Forests, Woodlands and Scrub; the Mediterranean Sea; and the Northeast Atlantic Shelf Marine ecoregion. The first two are directly relevant to terrestrial biomass sourcing, while the marine ecoregions provide broader conservation context.

	Forest management documents for public and larger private forests describe stands, sites, protection functions and known environmental constraints. ONF biodiversity guidance and FSC requirements provide a stronger site-level framework. PEFC France requires owners to recognise high ecological-value areas, habitat trees, deadwood and protected features, but benchmark coverage is Partial because the scheme does not invariably require a complete pre-harvest assessment of all HCV categories and possible new biodiversity elements. Regarding TOF Landscape, the January 2008 land-status inspection also applies where woody vegetation developed on land that was wetland, peatland or highly biodiverse grassland. The EU RED Level B assessment and this indicator determine whether the original ecosystem was lost or degraded through woody development or subsequent management. Biomass resulting from such conversion is ineligible. Biomass arising from operations demonstrably required to conserve or restore the original ecosystem is assessed according to the conservation objective and resulting impacts. Relevant institutes and law enforcement The Ministry for Ecological Transition, DREAL, OFB and prefectural services administer nature-conservation law. UAR PatriNat, MNHN and OFB maintain INPN; regional scientific councils support ZNIEFF inventories. ONF integrates mapped and observed values into public-forest planning and operations. CNPF reviews private-forest management documents, while DDT(M) and DREAL process relevant cutting, species, water and Natura 2000 procedures. The main operational sources are INPN, Géoportail, regional environmental portals, Natura 2000 documents, forest-management records and site observations. Environmental inspectors and designated forest agents can investigate offences and stop or sanction operations affecting protected species, habitats or areas. Performance in practice and critical reviews The 2024 French national Red List review reported that 17,367 species had been assessed, of which 2,903 were threatened and 189 had disappeared from France or become globally extinct. The Government's biodiversity portal identifies France, including its overseas territories, as the sixth country harbouring the largest number of threatened species and states that approximately one quarter of its strictly endemic species are threatened. These national figures provide context but are not specific to metropolitan forests. The 2020 sustainable-forest-management indicators classified 87% of metropolitan production forest as semi-natural and recorded native species as the principal species on 93% of the area. Plots contained an average of approximately five tree species per 0.2 ha, rising to 5.8 in mixed stands. Of the assessed forest-associated groups, 24% of birds and 13% of reptiles and amphibians were threatened.

	IGN applies species-specific age thresholds when identifying old stands. These begin at 50 years for birch and 70 years for alder and aspen; thresholds for most longer-lived broadleaves and fir are between 120 and 200 years, while the threshold for sessile oak is 240 years. Stands meeting the relevant thresholds represented approximately 365,000 ha, or 2.5% of production forest. Large-tree volumes have increased, but many cavity-using and saproxylic species remain dependent on old trees and deadwood. Average deadwood volume was estimated at approximately 23 m^3/ha: 7 m^3 standing and 16 m^3 lying. Around half was below 12.5 cm in diameter and only about 6% exceeded 32.5 cm. The Pyrenees form a transboundary ecoregion of approximately 2.6 million ha, containing near-natural conifer and mixed forests across a broad altitudinal range. Its ecological continuity supports more than 200 endemic plant species and fauna including the brown bear, Aurelio's rock lizard and the endangered, endemic Pyrenean frog. Ecoregion-wide assessments indicate that approximately 386,000 ha, or about 15%, is protected, while only a small proportion of the area outside protection retains natural forest. Protected areas therefore cover important parts of the mountain chain but do not encompass every remaining natural forest fragment. These characteristics make the Pyrenean forests particularly relevant to HCV2 screening, including the assessment of landscape-scale ecological continuity and concentrations of endemic or threatened species. France has a dense protected-area and inventory system, so many known biodiversity values are identifiable. However, mapped datasets differ in scale and update frequency and do not replace a site inspection. Microhabitats, nests, newly established protected species and locally important unprotected features are absent from a general map. Regarding TOF Landscape, hedges, riparian strips, isolated tree stands, and traditional pollards can contain protected species, habitats and other important biodiversity values. National and regional mapping identifies many relevant areas and ecological networks, but does not capture every nest, roost, cavity, veteran tree or locally important ecological connection. IGN/OFB bocage monitoring and the developing hedge-observatory framework improve landscape-level information, but site-specific identification still depends on supplier information and pre-operation inspection. The practical weakness is therefore concentrated in operations without detailed management planning or a site-specific pre-harvest biodiversity check. This particularly concerns uncertified private forests, Trees Outside Forests and some PEFC-certified private plots.
Risk Rating	Specified Risk

Belgium	**Indicator**

European area	
2.1.1	Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.
Supply Base Verifiers	Applicable laws, regulations and policy frameworks EU Habitats Directive – Annex I forest habitats https://eunis.eea.europa.eu/habitats/10185https://eunis.eea.europa.eu/habitats/10187 Natura 2000 viewer – Belgium site boundaries and Standard Data Forms (SDFs) https://natura2000.eea.europa.eu/# Wallonia: Circulaire 2556 (14 April 1995) and Circulaire 2619 (22 Sept. 1997)(Cited in forestry practice – source in Walloon forestry documentation) Convention on Biological Diversity – Belgium party page https://www.cbd.int/countries/?country=be CITES species database – Belgium implementation https://www.speciesplus.net Flanders Forest Act (Bosdecreet) https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1003183¶m=informatie Flemish Nature Decree (Natuurdecreet) 1997 https://www.vlaanderen.be/natuurdecreet Forest Code and Environmental Code – Wallonia https://environnement.wallonie.be/home/legislation/nature-et-forets.html Brussels Nature Conservation Ordinance (Ordonnantie natuurbehoud) https://leefmilieu.brussels/themas/natuur-en-biodiversiteit/natuurgebieden-en-bescherming/het-natuurbeschermingsbeleid Institutional roles and oversight functions (incl. law enforcement) Agency for Nature and Forest (ANB) – Flanders https://www.natuurenbos.be/over-ons/publicaties Département de la Nature et des Forêts (DNF) – Wallonia https://agriculture.wallonie.be/ Bruxelles Environnement – Forest and nature management https://environnement.brussels/thematiques/nature EEA – EU habitat status and reporting under Art. 17 https://www.eea.europa.eu/themes/biodiversity/state-of-nature-in-the-eu UNESCO Intangible Cultural Heritage – Belgium https://ich.unesco.org/en/state/belgium-BE?info=periodic-reporting&utm_source=chatgpt.com UNESCO World Heritage List – Belgium https://whc.unesco.org/en/statesparties/be Flanders Heritage Agency (Agentschap Onroerend Erfgoed) https://www.onroerenderfgoed.be Agence Wallonne du Patrimoine (AWaP) https://www.awap.be https://agencewallonnedupatrimoine.be/wp-content/uploads/2024/05/2024_SPW_AWaP_Copat_brochureUsager.pdf Urbanism and Heritage – Brussels

	https://urban.brussels/thematiques/patrimoine Analysis of practical performance by minimum and typical actors Natura 2000 online map viewer and SDFs https://natura2000.eea.europa.eu/# On biodiversity and forest health – Wallonia https://orbi.uliege.be/handle/2268/179245 Geopunt – Flanders GIS and planning tool https://www.geopunt.be Ancient and Primeval Beech Forests of the Carpathians and Other Regions of Europe – UNESCO listing https://whc.unesco.org/en/list/1133/ FSC NRA Belgium https://fsc.org/en/document-centre/documents/resource/397 Critical review based on secondary sources EEA – State of Nature in the EU 2020 report https://www.eea.europa.eu/publications/state-of-nature-in-the-eu-2020 HCV Network – official HCV definitions and tools https://www.hcvnetwork.org Peer-reviewed forest biodiversity analysis (Wallonia) https://orbi.uliege.be/handle/2268/179245 UNESCO overview – cultural and natural values in Belgium https://whc.unesco.org/en/statesparties/be EU RED II / RED III https://energy.ec.europa.eu/topics/renewable-energy/renewable-energy-directive-targets-and-rules_en Biodiversity Platform – Belgium national pages https://biodiversity.europa.eu/countries/belgium
Risk Rating justification	HCV 1 – Species diversity: concentrations of biological diversity including endemic species, and rare, threatened, or endangered species that are significant at global, regional, or national levels. All three Belgian regions have implemented laws and regulations to identify and map protected species, biodiversity and their habitats, including endemic species, and species that are in decline and/or rare, and represent a significant ecological value on a global, regional, or national level. See also HCV 3. HCV 2 – Landscape-level ecosystems and mosaics: Intact forest landscapes and large landscape - level ecosystems and ecosystem mosaics that are significant at global, regional or national levels, and that contain viable populations of the great majority of the naturally occurring species in natural patterns of distribution and abundance. 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. The Ardennes Forest is a region of extensive forests, rolling hills and ridges

	primarily in Wallonia and Luxembourg, extending into Germany and France. It is a large forest landscape what is managed in a multi-functional, intensive, but sustainable manner. The forest is a patchwork of ecosystem mosaics. The natural occurring species are maintained. High conservation value areas and environmentally valuable ecosystems are well mapped and identified. HCV 3 – Ecosystems and habitats: rare, threatened, or endangered ecosystems, habitats or refugia Regional authorities assess the presence and spatial distribution of rare, threatened, and endangered habitats and ecosystems. In Flanders, this is carried out by the Agentschap voor Natuur en Bos (ANB) under the Flemish Ministry of Environment. In Wallonia, the task falls to the Département de la Nature et des Forêts (DNF), part of the Service public de Wallonie – Agriculture, Ressources naturelles et Environnement (SPW ARNE). In Brussels, Brussels Environment is responsible. These agencies are in charge of environmental assessments, forest mapping, and forest inventory. These efforts contribute to the designation of protected areas such as Natura 2000 sites, forest and nature reserves, and national parks. Scientific institutions and expert commissions often support the regional authorities to ensure data quality and consistency. Forest inventory involves systematic data collection on forest composition, structure, and ecological value, supporting the identification and monitoring of key ecosystems and habitats. Regional forest inventories are conducted approximately every 10 to 15 years, while mapping for forest management plans takes place more frequently. Regarding forest management by large or groups of forest owners, all three regions have implemented laws and regulations to identify and map rare, threatened, or endangered ecosystems, habitats or refugia during forest management. A system including harvesting permits and online mapping systems are publicly available and guarantee a proper implementation of laws and regulations without much room for mistakes. Law enforcement is on a sufficient level as well. Protected areas are, for example Natura2000 sites, European Bird and Habitat sites, and nature and forest reserves. In Flanders and Brussels there are also Speciale Beschermings Zone's (SBZ), and Biological Hotspots. In all regions there are national parks. Wallonia also defines and maps ‘ancient forests’, which are subject to special attention. However, these forests do not have a legally binding status as yet. In Belgium there are no forest ecosystems that are classified as a Global 200 Ecoregion, but there are 9 ‘Priority forest habitats’ recognised under the EU Habitats Directive and 9 Ramsar sites (protected wetlands). The Natura2000 sites have the goal to protect the most valuable and threatened plants and animals and their habitats, and where necessary develop and restore them. The Natura 2000 network comprises the ‘Special Protection Areas’ (SPA) designated under the EU Birds Directive and the ‘Sites of Community Importance’ (SCI) under the EU Habitats Directive. Special commissions identified and mapped the Natura 2000 areas.

	HCV 4 – Critical ecosystem services: basic ecosystem services in critical situations, including protection of water catchments and control of erosion of vulnerable soils and slopes. Areas at risk, such as water catchments, vulnerable soils, and slopes, have been identified and mapped. In Wallonia, the Department of Nature and Forests has designated around 37,000 ha as priority areas for this function. These include hydromorphic soils, peat and acid peat soils, slopes, watercourses and their riparian zones, springs, water catchments, and dam reservoirs. Similar mapping and protective measures are implemented in Flanders and the Brussels Region, though on a smaller scale. HCV 5 – Community needs: Sites and resources fundamental for satisfying the basic necessities of local communities or indigenous peoples (for livelihoods, health, nutrition, water, etc.), identified through engagement with these communities or indigenous peoples. In Belgium there are no local communities or indigenous people, who rely directly on forests to meet basic subsistence needs such as food, fuelwood, shelter, or traditional medicine. Although the forests are important for local economies and are the source of income of many people, it is not considered related to this HCV. This HCV concerns the direct fulfilment of basic needs of people dependent on forests. The functions of forests, including the recreational function, and, for example, aspects regarding the availability of clean air and (drink) water are well developed in Belgium. Relevant areas and objects are identified and mapped. HCV 6 – Cultural values: sites, resources, habitats, and landscapes of global or national cultural, archaeological, or historical significance, and/or of critical cultural, ecological, economic, or religious/sacred importance for the traditional cultures of local communities or indigenous peoples, identified through engagement with these local communities or Indigenous Peoples. The three Belgian districts have identified and mapped cultural heritage sites and features, as also areas of national cultural significance. Some of these sites can be found in forests. Also archaeological sites and features have been identified and mapped. In Belgium there are two UNESCO commissions: The ‘Flanders UNESCO Commission’; and the ‘Commission Belge Francophone et Germanophone pour l'UNESCO’. In 2022, there are 14 cultural UNESCO World Heritage sites listed in Belgium and one natural site. Only a few of the cultural sites are located in green areas. In practice, there is practically no risk these areas will be damaged by harvesting operations. The natural sites fall under the category ‘Ancient and Primeval Beech Forests of the Carpathians and Other Regions of Europe’. Regarding Belgium, this category covers five separate (identified and mapped) forests. They are grouped within 10 km distance from each other, to the south of Brussels. Nevertheless, the forests are located in Flanders, Wallonia, and Brussels. There are no Belgium sites on the list of ‘World Heritage sites in Danger’. If an object of cultural, archaeological, or historical significance is discovered

	during planning or operations, the law requires that it be reported immediately to the relevant regional authority: Agentschap Onroerend Erfgoed (Flanders); Agence Wallonne du Patrimoine (AWaP); and Brussels Urbanism and Heritage. These organisations are responsible for evaluating, documenting, and protecting such discoveries. Unauthorised removal or failure to report may lead to legal penalties. The updated Walloon Heritage Code (CoPat), effective from June 1, 2024, aims to enhance legal stability and administrative efficiency in heritage management. Key reforms include the introduction of a distinct heritage authorization separate from urban planning permits, the establishment of expedited procedures for recurring events, and the implementation of preliminary archaeological assessments for major projects. Additionally, the code sets defined timelines for classification processes and introduces a dedicated regime for heritage-related infractions and sanctions. Trees Outside Forests (TOF) – Landscape Feedstock (only) In Belgium, the legal frameworks for trees in landscapes differ by region but share a common basis in biodiversity protection and HCV identification. Landscapes fall under broader conservation and spatial planning laws that safeguard ecological functions and protected species. Instruments such as the Flemish, Walloon, and Brussels Red Lists of threatened species, the EU-wide Natura 2000 framework, and species protection laws—including the Royal Decree of 9 April 2003—apply nationwide and cover both forest and non-forest areas. International frameworks like CITES and the IUCN Red List also contribute to identifying and protecting high conservation value species in Belgium. Mapping tools and site inspections support enforcement. In Flanders, the Decreet Natuurbehoud and Codex Ruimtelijke Ordening require permits for felling and, in some cases, for maintenance such as pruning, especially for ecologically valuable trees or mapped small landscape elements. Compensation may be required. In Wallonia, the Code du Développement Territorial (CoDT) applies, with permit requirements depending on zoning. Brussels follows similar rules under the Ordonnantie Natuurbehoud. Comment Foronex Regarding the identification and mapping of HCV1 and HCV3, it is important to recognise that ecological conditions are dynamic. High Conservation Value (HCV) species and habitats may emerge in new locations, sometimes within a short period of time. To ensure that HCV1 and HCV3 values are adequately identified and managed, harvesting plots need to be assessed prior to the commencement of operations. Under this indicator (2.1.1), the general framework for assessing HCV1 and HCV3 in Belgium is considered. This includes the main organisational processes for identifying and mapping HCVs, the designation of protected areas, forest inventory practices, and other regionally relevant factors. The need for plot-level verification and mapping of ecological values before forest operations is addressed in the subsequent biodiversity indicator 2.1.3. Indicators 2.1.2 and 2.1.3 are Specified Risk.

Risk Rating	Low Risk

Belgium European area	**Indicator**
2.1.2	Threats to and impacts on the identified key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified and evaluated.
Supply Base Verifiers	• Ratified and implemented conventions • Legislation and regulations, authorities and law-enforcement • Databases, and critical publications EEA – State of Nature in Europe: A Health Check (2023) https://www.eea.europa.eu/en/topics/at-a-glance/nature/state-of-nature-in-europe-a-health-check EEA – Conservation status of habitats under the EU Habitats Directive https://www.eea.europa.eu/en/analysis/indicators/conservation-status-of-habitats-under European Environment Agency – habitat status reporting (Art. 17) https://www.eea.europa.eu/themes/biodiversity/state-of-nature-in-the-eu OECD Environmental Performance Review – Belgium (2021) https://www.oecd.org/environment/country EEA – State of Nature in Europe: A Health Check (2023) -reviews/oecd-environmental-performance-reviews-belgium-2021-80f4d1b5-en.htm EU Habitats Directive – Annex I forest habitats habitats (exampels) https://eunis.eea.europa.eu/habitats/10185 https://eunis.eea.europa.eu/habitats/10187 https://eunis.eea.europa.eu/habitats/10045 Natura 2000 viewer – Belgium site boundaries and SDFs https://natura2000.eea.europa.eu/# Convention on Biological Diversity – Belgium party page https://www.cbd.int/countries/?country=be Geopunt – forest parcel location and mapping (Flanders) https://www.geopunt.be Red List of Threatened Species (Belgium – National and Regional) https://www.sciencedirect.com/science/article/pii/S0006320724001307 Natura 2000 – European Environment Agency https://www.eea.europa.eu/themes/biodiversity/natura-2000/the-natura-2000-protected-areas-network CITES – Species Protected under International Trade Rules (Belgium https://www.health.belgium.be/en/animals-and-plants/cites/species-protected-cites IUCN European Red List Portal https://www.iucnredlist.org/regions/european-red-list See also indicator 2.1.1.
Risk Rating justification	HCV 1 – Species diversity: concentrations of biological diversity including endemic species, and rare, threatened, or endangered species that are

	significant at global, regional, or national levels. Belgium is a signatory to multiple international agreements such as the Habitats Directive, the Convention on Biological Diversity (CBD), and CITES, aimed at protecting biodiversity. A system including harvesting permits and online mapping systems are publicly available and guarantee a proper implementation of laws and regulations without much room for mistakes. Law enforcement is on a sufficient level as well. Forest inspectors supervise and/or check the result of the forest operations. They check if every requirement of the felling licence (and management plan) is fulfilled, including mandatory rules about conserving habitats and vegetations with high conservation value. However, in some cases a permit and a management plan are not obligatory. See also specified risk for HCV 3. (indicator 2.1.2) and related concerns with permits in indicator 1.1.1. HCV 2 – Landscape-level ecosystems and mosaics: Intact forest landscapes and large landscape - level ecosystems and ecosystem mosaics that are significant at global, regional or national levels, and that contain viable populations of the great majority of the naturally occurring species in natural patterns of distribution and abundance. 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 3 – Ecosystems and habitats: rare, threatened, or endangered ecosystems, habitats or refugia: Much has been done in Belgium on the protection of HCV3, several kinds of protection areas have been founded to conserve high-value ecosystems, providing a home to endangered and threatened flora and fauna species. Regarding the many protected and conservation areas in Belgium, the 'control systems and procedures to identify and address potential threats' are sufficiently strict. The areas are also sufficiently inspected and monitored by the authorities. Whenever high-conservation ecosystems and habitats have been found (identified and mapped, indicator 2.1.1), then there are sufficient control systems and procedures to protect and conserve them (in regular forests, wood lands and other areas). A system including permits and online maps is publicly available, and guarantees a proper implementation of laws and regulations without much room for mistakes. However, there are exceptions, in which a permit and a management plan are not obligatory. In general, harvesting regimes have a low impact, and natural ecosystems are recovering. For example, the lynx and the wolf have returned to the forest. The European Environment Agency (EEA) monitors every six years for each biogeographical region the condition of habitats and species compared to the favourable status as described in the Habitats Directive. The EEA reports that

	10 Annex I habitat types (which are also HCV forests) are under severe pressure in Belgium. They have the red status, meaning: “Bad: the habitat is in serious danger of disappearing”. It concerns the following habitat types and codes (Annex I EU Habitats Directive): - 9110 - Luzulo-Fagetum beech forests - 9120 - Atlantic acidophilous beech forests with Ilex and sometimes also Taxus in the shrublayer (Quercion robori-petraeae or Ilici-Fagenion) - 9130 - Asperulo-Fagetum beech forests - 9160 - Sub-Atlantic and medio-European oak or oak-hornbeam forests of the Carpinion betuli - 9180 - Tilio-Acerion forests of slopes, screes and ravines - 9190 - Old acidophilous oak woods with Quercus robur on sandy plains - 91D0 – Bog woodland - 91E0 - Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) - 91F0 - Riparian mixed forests of Quercus robur, Ulmus laevis and Ulmus minor, Fraxinus excelsior or Fraxinus angustifolia, along the great rivers (Ulmenion minoris) - 2180 - Wooded dunes of the Atlantic, Continental and Boreal region The Natura 2000 areas in Belgium are indicated and described online. The Natura 2000 online map indicates, for example, if the site harbours one or more of the 9 HCV forest types that are indicated red. If one opens the Standard Data Form (SDF) of the Natura 2000 site, one can find the (forest) ecosystems present onsite and the treats they encounter. As of April 2025, most of the relevant Natura 2000 sites are indicated in red. Although the Standard Data Forms (SDFs) for all Belgian Natura 2000 areas state that no formal management plan exists (Section 6.2), in practice, management plans do exist but vary in quality. Relevant organisations involved in this topic have been contacted for clarification. Given the current status, the nine forest types (Annex I habitats) mentioned above are regarded under threat, unless demonstrated otherwise on a case-by-case basis. These forests, or elements of these forest types occur within and outside Natura 2000 areas. See also related concerns in indicator 1.1.1. HCV 4 – Critical ecosystem services: basic ecosystem services in critical situations, including protection of water catchments and control of erosion of vulnerable soils and slopes. Relevant functions to this HCV are erosion control, flooding control, barriers against fires and clean water catchments. Erosion and runoff is sufficiently prevented by the regular forestry laws and regulations. Harvesting permits (and approved forest management plans) are issued with the provision that the condition of the forest will not deteriorate. Forest management and harvesting operations are evaluated by regional authorities, they check its location and consider the risks. The around 37.000 hectares of public forests in Wallonia that have as a primary function the protection of vulnerable soils, slopes and water bodies are subject to particular protection measures (Circulaire 2556 of 14 April

	1995; and Circulaire 2619 of 22 Sept. 1997 'relative aux aménagements dans les bois soumis au régime forestier'). No articles or statements were found, indicating that forest management practices could be contributing to flooding or erosion in Belgium. Harvesting operations are small scale and the share of resistant mixed, multilayer forests is increasing. Over the last three decades, federal and regional authorities have been preparing climate change mitigation measures in forestry, resulting more resistant and resilient forests. HCV 5 – Community needs: Sites and resources fundamental for satisfying the basic necessities of local communities or indigenous peoples (for livelihoods, health, nutrition, water, etc.), identified through engagement with these communities or indigenous peoples. In Belgium there are no local communities or indigenous people, who rely directly on forests to meet basic subsistence needs such as food, fuelwood, shelter, or traditional medicine (see 2.1.1). HCV 6 – Cultural values: sites, resources, habitats, and landscapes of global or national cultural, archaeological, or historical significance, and/or of critical cultural, ecological, economic, or religious/sacred importance for the traditional cultures of local communities or indigenous peoples, identified through engagement with these local communities or Indigenous Peoples. In Belgium, the management and protection of HCV6 sites are handled by regional commissions and heritage agencies. In Flanders, the Royal Commission for Monuments and Sites (KCML-Flanders) operates within the Flanders Heritage Agency (Agentschap Onroerend Erfgoed). In the Brussels-Capital Region, KCML Brussels oversees similar functions under the regional heritage framework. In Wallonia, the Royal Commission for Monuments, Sites and Excavations (CRMSF Wallonia) works alongside the Agence Wallonne du Patrimoine (AWaP). Each region applies its own legal framework to protect and manage culturally significant areas. Internet research revealed that the Flanders and Brussels Heritage Agencies have not been the subject of notable criticism and are actively engaged in heritage promotion, including educational initiatives. However, the Agence Wallonne du Patrimoine (AWaP) has reportedly been mentioned in discussions regarding operational challenges, including resource limitations and legal constraints. Trees Outside Forests (TOF) – Landscape Feedstock (only) While in Belgium not all landscapes are consistently inventoried or evaluated through a unified HCV-specific system, threat and impact evaluations are to some extent embedded in regional permitting and planning procedures. Protected zones, species lists, and Natura 2000 frameworks ensure that ecological values and risks to biodiversity are considered during interventions, especially when mapped environmental features or sensitive areas are involved. Permit assessments under the Decreet Natuurbehoud (Flanders), CoDT (Wallonia), and Ordonnantie Natuurbehoud (Brussels) often include

	ecological evaluations, particularly when landscapes are located in or near designated protected zones, mapped “small landscape elements”, Natura 2000 sites, or known habitats of protected species. Environmental impact assessments (EIAs) are required for certain land-use changes or infrastructure works that may affect sensitive landscapes. These processes examine likely effects on species, habitats, and broader ecosystem services. Natura 2000 site assessments include evaluations of threats and pressures to Annex I habitats and Annex II species, some of which may be associated with landscape trees (with, for example, birds, bats, saproxylic beetles). Each region maintains official Red Lists which identify species of conservation concern. These lists are supported by species-specific action plans (for example for the hazel dormouse, lesser horseshoe bat, and certain orchid species) that include habitat requirements, distribution data, known threats, and recommended conservation measures. When permit applications for interventions involving landscape operation are assessed, these documents are used to evaluate potential impacts on listed species and to determine whether mitigation or refusal is warranted. In general, inspectors of regional (and lower) authorities cover landscapes in search of ecological values and protected species.
Risk Rating	Specified Risk

France European areas	**Indicator**
2.1.2	Threats to and impacts on the identified key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified and evaluated.
Supply Base Verifiers	Legislation and regulations Environmental Code (Code de l’environnement) Forest Code (Code forestier) Council Directive 92/43/EEC on habitats and species Directive 2009/147/EC on the conservation of wild birds Applicable Natura 2000, protected-area and forest-management documents URLs INPN — national natural heritage inventories and protected-area data — https://inpn.mnhn.fr Géoportail — national mapping and aerial imagery — https://www.geoportail.gouv.fr Ministry for Ecological Transition — environmental assessment — https://www.ecologie.gouv.fr/politiques-publiques/levaluation-environnementale Ministry for Ecological Transition — Natura 2000 impact assessment — https://www.ecologie.gouv.fr/politiques-publiques/evaluation-incidences-natura-2000 ONF — National Forest Operations Regulation —

	https://www.onf.fr/onf/+/2e::le-reglement-national-dexploitation-forestiere-ce-quil-faut-savoir.html Rural Code / CAP conditionality — retention and seasonal cutting rules for hedges and trees — https://www.legifrance.gouv.fr/codes/id/LEGISCTA000046864533 Service-Public — protected-species derogations and habitat controls — https://entreprendre.service-public.fr/vosdroits/F38791 OFB — sustainable hedge management and damaging practices — https://ofb.gouv.fr/gerer-durablement-ses-haies-et-en-creer-de-nouvelles
Risk Rating justification	• SBP benchmark: FSC — sufficiently covered; PEFC — partially covered. • Trees Outside Forests: applicable in the Landscape category. • SBE France: Low Risk for FSC-certified forests; Specified Risk for uncertified private forests, PEFC-certified private forests and TOF Landscape. EU RED Level B controls prevail where applicable. Indicator 2.1.1 identifies biodiversity values; 2.1.2 evaluates how operations may affect them. ONF-managed public forests have biodiversity inventories, impact evaluations and operational controls. Trees Outside Forests, uncertified private forests and some PEFC-certified plots may lack site-specific impact evaluations based on pre-harvest identification of HCVs and biodiversity values. Policies and laws The identification framework is described under 2.1.1. Once values are known or likely, the Environmental Code requires the operator or competent authority to evaluate relevant effects through protected-species rules, Natura 2000 assessment, environmental assessment, water procedures and protected-area regulations. The required depth depends on the legal status, operation and expected effect; not every ordinary forest operation undergoes a formal environmental-impact assessment. Forest-management documents and operational instructions translate those constraints into decisions on felling boundaries, retention, timing, access, machinery, water crossings and regeneration. PEFC and general law address many threats, but do not guarantee that every private or TOF operation is preceded by an evaluation. Relevant institutes and law enforcement The institutions and biodiversity information systems are described under 2.1.1. For impact evaluation, DREAL, DDT(M), OFB, Natura 2000 site bodies and protected-area managers assess legally triggered files; ONF evaluates public-forest operations, and CNPF considers environmental constraints when approving management documents. Environmental police can verify whether required evaluations and authorisations were obtained. Performance in practice and critical reviews Where ONF planning, protected-area management or FSC controls apply, threats are normally evaluated before operations begin. The remaining

	weakness is the operational gap between general mapping and the precise harvest site. A map can indicate potential sensitivity without showing a nest, cavity tree, wet microhabitat or the effect of the proposed timing and machinery. Regarding TOF Landscape, potentially damaging operations include complete hedge removal, simultaneous cutting of long connected sections, removal of old pollards or cavity trees, intensive flailing, disturbance during breeding periods and damage to banks, talus or adjoining habitats. Protected-species legislation applies to all operators, while CAP beneficiaries are additionally subject to the seasonal prohibition on cutting hedges and trees from 16 March to 15 August. However, ordinary TOF operations outside these specific controls are not systematically preceded by a site-specific biodiversity-impact assessment. Accordingly, the risk follows 2.1.1. A site-specific evaluation must show how the proposed operation could affect each identified value and which controls are needed. Absence of such evidence in the stated categories supports Specified Risk.
Risk Rating	Specified Risk

France European areas	**Indicator**
2.1.3	Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.
Supply Base Verifiers	Legislation and regulations Environmental Code (Code de l'environnement) Forest Code (Code forestier) Council Directive 92/43/EEC on habitats and species Directive 2009/147/EC on the conservation of wild birds Applicable protected-area, Natura 2000 and forest-management documents URLs INPN — national natural heritage inventories and protected-area data — https://inpn.mnhn.fr OFB — destruction and degradation of habitats — https://ofb.gouv.fr/la-destruction-des-habitats OFB — key biodiversity figures — https://ofb.gouv.fr/chiffres-cles EEA — forest habitats requiring restoration — https://biodiversity.europa.eu/europes-biodiversity/nature-restoration/habitats-to-be-restored/forests IGN — biodiversity indicators for French forests — https://foret.ign.fr/IGD/en/indicateurs/critere4 OFB — sustainable hedge management and damaging practices — https://ofb.gouv.fr/gerer-durablement-ses-haies-et-en-creer-de-nouvelles Ministry of Agriculture / CGAAER — hedge decline and policy assessment —

	https://agriculture.gouv.fr/la-haie-levier-de-la-planification-ecologique OFB — ecological, soil, water, carbon and heritage functions of hedges — https://ofb.gouv.fr/que-nous-apportent-les-haies-et-le-bocage
Risk Rating justification	• SBP benchmark: FSC — sufficiently covered; PEFC — sufficiently covered. • Trees Outside Forests: applicable in the Landscape category. • SBE France: Low Risk for FSC- and PEFC-certified forests where applicable controls are demonstrated; Specified Risk for uncertified forests and TOF Landscape outside protected areas in defined situations. EU RED Level B results prevail where applicable. Many ecosystems comprise, or retain key elements of, EU Habitats Directive Annex I habitats. Where identified, biodiversity values are sufficiently conserved in certified forests and protected areas. Management decisions on public and private areas may prioritise other objectives. Stands containing these values are still being clear-cut and replaced. Uncertified forests outside protected areas are therefore considered Specified Risk. Policies and laws Indicator 2.1.3 completes the sequence begun under 2.1.1 and 2.1.2: values must first be identified, impacts evaluated, and then management must actually maintain or enhance them. The Environmental Code prohibits destruction or significant impairment where protected-species, protected-habitat, Natura 2000 or protected-area rules apply. Forest plans and operational prescriptions can retain habitat trees, deadwood, riparian buffers, old stands and other key structures and can adapt timing, machinery and regeneration. Outside strict protection, not every Annex I-like habitat element or HCV has an automatic prohibition on harvesting or stand replacement. Management decisions can lawfully pursue production, regeneration, fire prevention, safety or climate adaptation. The indicator is therefore broader than minimum legality: it requires evidence that present biodiversity and HCV values were correctly managed and conserved, irrespective of whether the owner had independently stated a conservation objective. Relevant institutes and law enforcement Institutional roles are described under 2.1.1 and impact evaluation under 2.1.2. Protected-area managers, OFB and DREAL enforce binding conservation rules; ONF and CNPF translate relevant requirements into management documents. Performance in practice and critical reviews Approximately 53% of metropolitan France's forests lie within continuous forest massifs exceeding 100,000 ha. France's forest genetic-conservation network includes 112 conservation units covering ten target tree species. These extensive forests support landscape-scale ecological processes and gene flow; however, connectivity remains weaker in agricultural, peri-urban and intensively managed landscapes.

	Regarding TOF Landscape, wooded hedges and legally non-forest small woods or traditional communal coppice plots are particularly important in fragmented landscapes. They connect forests, woodland fragments and other biodiversity reservoirs, providing movement and dispersal routes for woodland and forest-edge species. They can also preserve long-established boundaries, collective management practices and historic landscape patterns. Their ecological effectiveness depends on continuity, width, native woody composition and the absence of major gaps. They supplement rather than replace connected forest habitat, but their removal or degradation can materially reduce landscape connectivity. Maintaining these values requires management that preserves the feature's ecological function over time. Relevant measures include retaining old native and cavity trees, maintaining connected vegetation, applying phased coppicing or pollarding, protecting shrub and ground layers and allowing sufficient recovery between interventions. OFB identifies excessively frequent cutting and unsuitable flail or rotor equipment as causes of hedge degradation and long-term tree mortality. National estimates indicate a net loss of approximately 23,500 km of hedges annually during 2017–2021. Protected areas and certified forests provide substantial controls, but national biodiversity reporting shows that many forest habitats remain in unfavourable condition. Operational evidence must therefore demonstrate that harvesting and regeneration maintain or enhance the values identified under 2.1.1 and address the impacts assessed under 2.1.2. Biomass resulting from the removal or substantial degradation of these values—including incompatible clear-cutting, habitat conversion, stand replacement or destructive operations in TOF Landscape are non-compliant.
Risk Rating	Specified Risk

Belgium European area	**Indicator**
2.1.3	Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.
Supply Base Verifiers	• Legislation and regulations, authorities and law-enforcement • Critical publications and opinions Applicable laws, regulations and policy frameworks Forest Act (Bosdecreet) 1990 – Flanders https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1003183¶m=informatie Forest Code 2008 and Environmental Code 2004 – Wallonia http://iprfw.spw.wallonie.be/docs/Publication_Inventaire-forestier-wallon.pdf Nature Conservation Ordinance 2012 – Brussels

	http://geonode.geobru.irisnet.be/fr/maps/zones-naturelles-protegees/71/ Species Decree (Soortenbesluit) 2009 – Flanders https://www.natuurenbos.be/sites/default/files/inserted-files/brochure_wegwijs_in_het_natuurbeheerplan.pdf Walloon Code of Nature (Code wallon de la nature) https://www.fao.org/3/cb0120fr/cb0120fr.pdf CBD implementation documents – Belgium http://www.biodiv.be/implementation/docs/books/bib EU Biodiversity overview – Belgium https://biodiversity.europa.eu/countries/belgium Institutional roles and oversight functions (incl. law enforcement) Agency for Nature and Forests (ANB) – Flanders https://www.natuurenbos.be/over-ons/publicaties Département de la Nature et des Forêts (DNF) – Wallonia http://iprfw.spw.wallonie.be/docs/Publication_Inventaire-forestier-wallon.pdf Bruxelles Environnement – Brussels http://geonode.geobru.irisnet.be/fr/maps/zones-naturelles-protegees/71/ Belgian CBD National Focal Point – Royal Belgian Institute of Natural Sciences http://www.biodiv.be/ Analysis of practical performance by minimum and typical actors Forest management plans and procedures – Flanders https://www.natuurenbos.be/sites/default/files/inserted-files/brochure_wegwijs_in_het_natuurbeheerplan.pdf Forest inventory – Wallonia http://iprfw.spw.wallonie.be/docs/Publication_Inventaire-forestier-wallon.pdf Geopunt – Land zoning and forest cover reference (Flanders) http://www.geopunt.be/ GeoBru – Protected area zoning (Brussels) http://geonode.geobru.irisnet.be/fr/maps/zones-naturelles-protegees/71/ Critical review based on secondary sources CBD national reports – Belgium https://www.cbd.int/reports/ CBD country page – Belgium https://www.cbd.int/countries/?country=be FSC NRA Belgium https://connect.fsc.org/document-centre/documents/resource/397 FAO country profile https://www.fao.org/3/cb0120fr/cb0120fr.pdf EU Biodiversity Platform – Belgium overview https://biodiversity.europa.eu/countries/belgium Peer-reviewed study on biodiversity implementation in Belgian forests https://www.frontiersin.org/journals/forests-and-global-change/articles/10.3389/ffgc.2024.1236203 Organic carbon and biodiversity mapping – ResearchGate (Belgium)

	https://www.researchgate.net/figure/Spatial-distribution-of-BOC-stock-kg-C-m-2-in-Belgian-forests-in-the-year-2000-The_fig1_43326882 OECD Environmental Performance Review – Belgium (2021) https://www.oecd.org/environment/country-reviews/oecd-environmental-performance-reviews-belgium-2021-80f4d1b5-en.htm See also indicators 1.1.3, 2.1.1, 2.1.2, 2.2.2, 3.2.2, 3.2.3.
Risk Rating justification	See findings on the maintenance of HCV 1 and 3 under indicator 2.1.2; as well as indicators 1.1.3, 2.1.1, 2.2.2, 3.2.2, 3.2.3. 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 is followed as a guideline for implementation. The Strategy plan takes into account 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. All three regional forestry acts of Belgium require forest owners to maintain forest cover on forest land. In Flanders, the main legal documents are: the Forest Act (Bosdecreet) of 1990 and subsequent amendments, Chapter VIII (on forest protection), article 90bis (on deforestation) and article 47 (on conversion in nature reserves); and the Nature Act (Natuurdecreet) of 1997, article 36 §3 (on exceptional deforestation in Natura 2000 areas). In Wallonia it are mainly the Forest Code of 2008, and the Environmental Code of 2004 (and their many amendments). In the Brussels-Capital Region, relevant provisions are found in the Nature Conservation Ordinance of 2012. The maintenance of HCVs is monitored by the responsible regional authorities: the Agency for Nature and Forest (ANB) in Flanders, the Département de la Nature et des Forêts (DNF) in Wallonia, and Bruxelles Environnement in Brussels. Red List species in Flanders are indirectly protected through the Species Decree (Soortenbesluit) of 2009, which implements both European and regional conservation obligations. The decree includes a list of strictly protected species and prohibits their disturbance, capture, killing, or destruction of habitats. Many Red List species are covered if they are also listed under the Habitats Directive or Birds Directive. Additionally, the Nature Decree (Natuurdecreet) allows for the designation of protected areas and the adoption of species action plans. In Wallonia, Red List species are primarily protected under the Walloon Code of Nature (Code wallon de la nature), which consolidates earlier legislation and includes species protection rules. Like in Flanders, species protected under EU legislation receive automatic protection, but not all Red List species are included. Site-level measures (e.g. Natura 2000, forest reserves) and voluntary management plans may enhance protection, but legal coverage of Red List species remains incomplete. Species protection is governed in the Brussels-Capital Region by the Ordinance on Nature Conservation (Ordonnantie natuurbehoud) of 2012. A regional list of protected species exists, aligned partly with EU obligations.

	Protection of Red List species depends on their inclusion in these lists. Habitat protection measures, including the management of Natura 2000 sites and green spaces, contribute to conserving some Red List species, but gaps remain, especially for non-EU-listed taxa. A legal framework applies to both public and private forests. On private land, the maintenance of HCV 1 (forests with significant concentrations of biodiversity) and HCV 3 (rare or threatened ecosystems) is regulated through Natura 2000 designations, species protection legislation, site-specific forest or nature management plans, and environmental permits. Activities that may impact these values generally require prior approval from the competent regional authority. In Wallonia, many private forest owners are not required to have an approved forest management plan or to obtain permits for harvesting operations, which may put the conservation of HCVs under pressure; however, on private land outside the designated forest zone (as defined in the sector plan), an urban planning permit may still be required from municipal authorities, depending on factors such as the surface area to be cleared, the type of vegetation, and the intended post-harvest land use. Since key species, habitats, ecosystems, and areas of high conservation value (HCV) may emerge over varying timescales in new locations, pre-harvest assessments are essential to ensure their identification, conservation, and protection. Trees Outside Forests (TOF) – Landscape Feedstock (only) As described under indicator 2.1.2, the identification and protection of HCVs are embedded in biodiversity, species protection, and spatial planning laws. Most principles extend beyond forests to landscapes, where region-specific permit systems and planning codes regulate activities such as selective cuttings and pruning. Conservation of biodiversity and HCVs is addressed through instruments including regional Red Lists, Natura 2000 designations, and species-specific protection laws. While this framework allows for the consideration of key species, habitats, ecosystems, and HCVs in the landscape context, the applicability and depth of such assessments vary per case.
Risk Rating	Specified Risk

Belgium European area	**Indicator**
2.2.1	Feedstock shall not be sourced from land that had one of the following statuses in January 2008 and no longer has that status due to land conversion: a. Forests b. Wetlands c. Peatlands d. Highly biodiverse grasslands.
Supply Base Verifiers	• Legislation and regulations, authorities and law-enforcement • Critical publications and opinions Applicable laws, regulations and policy frameworks Forest Act (Bosdecreet) 1990, Flanders

	https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1003183¶m=informatie Code Forestier 2008, Wallonia https://environnement.wallonie.be/home/legislation/nature-et-forets.html EU Nature Restoration Law (2024/1342) https://www.europarl.europa.eu/news/en/press-room/20240223IPR18078/nature-restoration-parliament-adopts-law-to-restore-20-of-eu-s-land-and-sea https://www.europeanmovement.ie/the-eu-nature-restoration-law-explained Natura 2000 Prioritised Action Frameworks (P.A.F.) https://www.lifeb4b.be Institutional roles and oversight functions (incl. law enforcement) Agentschap voor Natuur en Bos (Flanders) https://www.natuurenbos.be/over-het-anb/strategische-doelstellingen Département de la Nature et des Forêts (Wallonia) https://environnement.wallonie.be/home/legislation/nature-et-forets.html LIFE Nardus project (grassland management in Wallonia) https://www.natuurpunt.be/projecten/life-nardus-limosa-english Analysis of practical performance by minimum and typical actors Forest inventory results – Flanders https://www.natuurenbos.be/beleid-wetgeving/natuurbeheer/bosinventaris/resultaten#karakteristieken-bosareaal https://www.natuurenbos.be/dossiers/bosinventaris#toc-resultaten https://www.natuurenbos.be/vlaamse-bosinventaris/Website_BosAreaal.html Forest inventory tool – Wallonia https://appliprfw.gembloux.ulg.ac.be/ Annual Report – ANB (Flanders) https://www.vlaanderen.be/publicaties/jaarrapport-agentschap-voor-natuur-en-bos Peatland restoration overview (EUKI / REWET) https://www.euki.de/wp-content/uploads/2025/01/Peatland-Restoration.pdf Historical wet grassland LIFE project https://webgate.ec.europa.eu/life/publicWebsite/project/LIFE97-NAT-B-004206/protection%20of-the-habitats-of-a-number-of-priority-species-of-wet-grasslands-in-belgium EU Grassland Watch (satellite monitoring) https://environment.ec.europa.eu/events/eu-grassland-watch-launch-event-brussels-hybrid-2023-09-12_en Critical review based on secondary sources Belgian Biodiversity Platform Highlights Report 2022 https://www.vlaanderen.be/inbo/en-GB/publications/belgian-biodiversity-platform-highlights-report-2022 Belgian Biodiversity Platform Highlights Report 2023 https://pureportal.inbo.be/en/publications/belgian-biodiversity-platform-highlights-report-2023-belgian-biod

	Nature Report 2020 (Flanders) https://purews.inbo.be/ws/portalfiles/portal/33987067/NatureReport_2020_Final.pdf National Climate Adaptation Plan (Belgium) https://climat.be/doc/NAP_EN.pdf Forest and peatland trends – Climate Change Post https://www.climatechangepost.com/belgium/forestry-and-peatlands/ Journalistic review on stagnant forest growth https://www.mo.be/nieuws/vlaamse-bossen-geen-vierkante-meter-erbij-sinds-2000 Forest dashboard https://www.bosteller.be/ See also indicators 1.1.1, 1.1.4, and 2.2.3.
Risk Rating justification	See also indicators 1.1.1, 1.1.4, and 2.2.3. on main aspects related to land use, federal and regional legislation, and law-enforcement. Since 2008, Belgium has seen a steady increase in mixed forests and stronger legal protection under regional forest codes. Restoration of peatlands and highly biodiverse grasslands is actively progressing through EU-backed projects like LIFE B4B, with monitoring supported by satellite tools and national inventories, ensuring compliance with EU Nature Restoration targets. Forest conversion Conversion from (semi-)naturally managed forest to forest plantations or woodland monocultures (such as poplar) can occur, but this is not common in Belgium. The general trend is the opposite, and existing regulations discourage such practices. - According to the forest inventory of Wallonia and many subsequent articles, the share of broadleaved trees is increasing, mainly due to a rapid decline of homogenous spruce stands. The areas of different kinds of mixed forests increased significantly. - According to the forest inventory of Flanders, the share of homogenous pine stands decreased from 30.3% to 21.6% in approximately three decades. The share of mixed forests with native tree species increased from 10.4% to 17.8%. All three regional forestry acts require that forest owners maintain forest cover on forest land. In Flanders the main legal documents are: the Forest Act (Bosdecreet) of 1990 and subsequent amendments, Chapter VIII (on forest protection), article 90bis (on deforestation) and article 47 (on conversion in nature reserves); and the Nature Act (Natuurdecreet) of 1997, article 36 §3 (on exceptional deforestation in Natura 2000 areas). In Wallonia it are mainly the Forest Code of 2008, and the Environmental Code of 2004 (and their many amendments). In Flanders deforestation is prohibited (Forest Act 1990), except in particular cases described in the Forest Decree. An ‘urbanise permit’, or an ‘allotment permit’ for forested land can only be granted if approved compensation measures are taken. The regional forest administration carries out the verification of compensation measures. If the forest administration observes

	that the planting of trees did not succeed, it can carry out the re-/afforestation in the place of the owner. Compensation measures are also needed when small groups of trees are harvested. The politicians raising concerns are of the opinion that harvesting permits are given too easily in Flanders. The 2020 annual report of the Agency of Nature and Forest of Flanders, however, indicates that for the first time in 5 years there is no deficit in forest compensation: more forest had been compensated than had been converted. In Flandres there is the ambition to add 10.000 ha of forest between 2019 and 2030, currently (2025) they realised 2.128 ha new forest and 717 hectares of compensation forest. Between 2008 and 2022, total forest area increased in Belgium with 0,58%. In comparison with 2000, it increased 3,30% (FAOstat). This increase was mainly realised in Wallonia. Regarding conversion of forests or plantations to non-forest land use, in Wallonia an 'urbanise permit' is required for all harvesting activities in 'agricultural zones' or 'green zones' as defined in the spatial plan ('plan de secteur'). While 'legal conversion' of forest to non-forest land use is still possible, it is subject to strict procedures and Stakeholder consultation. The forest area in the Brussels area is very small (17 km3) and stayed unchanged. Belgium is densely populated and the corruption level in Belgium is low, illegal conversion of forests has a high probability to be reported. Moreover, the procedure for granting permission for conversion is transparent (includes stakeholder consultation). Wetlands and Peatlands The EU Nature Restoration Law requires Belgium to restore 30% of its drained peatlands by 2030 and 50% by 2050. At least 25% must be rewetted by 2030, rising to 33% by 2050. Rewetting is voluntary for farmers and landowners. Belgium must scale up current efforts, especially in Flanders and Wallonia, and submit a national restoration plan by 2026 to meet these binding targets. Belgium has no national law yet to implement the EU Nature Restoration Law but takes action regionally. Flanders supports wetland and peatland recovery through the Blue Deal and Nature Restoration Programme. Wallonia uses regional plans and EU-funded projects, while Brussels includes wetlands in its green space strategy. Legal updates will likely follow before 2026 to meet EU obligations. Since 2008, Belgium has prioritised the restoration of wetlands and peatlands. Projects such as LIFE Multi Peat aim to rewet degraded peatlands, reducing greenhouse gas emissions and supporting biodiversity. In Flanders, coordinated efforts focus on hydrological restoration and expansion of peat areas at the landscape level. The Gérard & Francis Paquay Natural Reserve exemplifies these restoration efforts. Current policy and project initiatives emphasise conservation, with no significant new conversions reported during this period. Belgium is a signatory to the Ramsar Convention, and nine sites are designated as wetlands of international importance, such as the Zwin

	(Flanders), Hautes Fagnes (Wallonia), and the Valley of the Haute-Sûre. Additionally, some of the areas are included in the Natura 2000 network. According to the regional Forest Acts, wetlands, peatlands and bogs are strictly protected. The majority of these areas are registered in publicly available databases, special maintenance work may be performed, under strict regulation. Highly biodiverse grasslands In Belgium, the management of highly biodiverse grasslands in forests and natural landscapes is regulated regionally. In Flanders, the Forest and Nature Decrees require both public and private forest owners to maintain biodiversity, especially in VEN and Natura 2000 areas. The Agency for Nature and Forests enforces these rules. In Wallonia, the Code Forestier and Décret Nature guide sustainable forest and landscape practices, overseen by the Department of Nature and Forests. Brussels manages its limited forests and green spaces through Brussels Environment, with a focus on urban biodiversity. These grasslands can be officially classified as forest land under regional legislation if they lie within the forest perimeter and support forest ecosystem functions. This includes glades, rides, and open areas that benefit light-demanding species. In landscapes outside forest zones, grasslands may be protected under nature conservation rules, if recognised as valuable habitats. The current efforts align with EU directives, including the Nature Restoration Law and Habitats Directive. Belgium's Natura 2000 Prioritised Action Frameworks set out measures and funding. Enforcement is handled by regional authorities, with support provided through guidance, subsidies, and programmes such as LIFE Belgium for Biodiversity (B4B) B4B covers targeted actions for grassland recovery. The EU Nature Restoration Law requires Belgium to restore 30% of habitats in poor condition by 2030, increasing to 60% by 2040 and 90% by 2050. This includes highly biodiverse grasslands in forests and landscapes. To meet EU targets, Belgium must submit a national restoration plan by 2026. In 2008 (the indicator's starting point), Belgium had fewer and more fragmented highly biodiverse grasslands than most other European countries, such as France, Germany, or Romania, due to centuries of intense land-use pressure from agriculture, urbanisation, and afforestation. Trees Outside Forests (TOF) – Landscape Feedstock (only) In the case of landscape feedstock, the same applies as mentioned above. The risk of conversion of these land cover types is very low in Belgium. Comment Foronex Since 2008, the general trend has been positive, and the risk of conversion or mismanagement of such vegetation types (into lower value forests, plantations, landscapes, or other terrain) is low. However, exceptions cannot be entirely ruled out. Besides, our company needs to comply with the REDIII requirements. Biomass from certain land cover types is always excluded from RED

	compliance (old-growth forests, heathland, peatland drained after 2008), while biomass from other valuable ecosystems (high biodiversity value forests and grasslands), are eligible only if the operations demonstrably contribute to the conservation of environmental values. Although the risk of conversion is low, the general risk mitigation procedure of assessing sourcing areas also takes this aspect into account.
Risk Rating	Low Risk

France European areas	**Indicator**
2.2.1	Feedstock shall not be sourced from land that had one of the following statuses in January 2008 and no longer has that status due to land conversion: a. Forests b. Wetlands c. Peatlands d. Highly biodiverse grasslands.
Supply Base Verifiers	Legislation and regulations Forest Code (Code forestier), provisions on land clearing Environmental Code (Code de l'environnement) Council Directive 92/43/EEC on habitats and species Applicable land-use, wetland, Natura 2000 and protected-area instruments URLs Géoportail — national mapping and aerial imagery — https://www.geoportail.gouv.fr INPN — national natural heritage inventories and protected-area data — https://inpn.mnhn.fr IGN — forest area and land-use indicators — https://foret.ign.fr/IGD/en/indicateurs/1.1 Ministry for Ecological Transition — wetlands — https://www.ecologie.gouv.fr/politiques-publiques/milieux-humides EU Biodiversity Information System — France — https://biodiversity.europa.eu/countries/france Service-Public — protected-species derogations and habitat controls — https://entreprendre.service-public.fr/vosdroits/F38791 Environmental Code — watercourse maintenance and ecological-status duties — https://www.legifrance.gouv.fr/codes/section_lc/LEGITEXT000006074220/LEGISCTA000006176469/
Risk Rating justification	• SBP benchmark: FSC — partially covered; PEFC — not covered. • Trees Outside Forests: applicable in the Landscape category. • SBE France: Specified Risk for all forest certification categories and TOF Landscape; EU RED Level B controls prevail. France's forest area has increased around 9% since 2007 (through conversion). However, policies, agri-environmental programmes and data indicate a low risk that natural grasslands, wetlands or peatlands were converted. Poplar plantations have also declined and for no risk. A small risk

	remains that forest expansion could have occurred at the expense of non-protected semi-natural grasslands. Policies and laws The Forest Code regulates clearing that terminates forest use (défrichement) and normally requires prior authorisation, subject to defined exemptions. The Environmental Code adds environmental assessment, protected-species, wetland, water, Natura 2000 and protected-area requirements. These systems control current conversion, but the SBP indicator also requires a historical test against the land status in January 2008. Wetlands and peatlands are protected through water law and site-specific designations rather than one complete national prohibition. Highly biodiverse grassland is an EU renewable-energy concept that does not correspond exactly to a single French cadastral or land-cover class. Forest certification evaluates conversion under scheme rules, but neither FSC nor PEFC documentation alone necessarily reconstructs all four January 2008 categories for each sourcing site. Relevant institutes and law enforcement DDT(M), DREAL, prefectures, OFB and municipalities administer clearing, water, species, planning and protected-area rules. ONF and CNPF integrate land-use constraints into management documents. IGN forest inventory, Géoportail, INPN, historical aerial photography and regional wetland inventories provide the evidence needed to compare current conditions with the 2008 baseline. Performance in practice and critical reviews At national scale, increasing forest area and strong controls on deforestation support a generally favourable picture. The more plausible risk is the establishment of woody vegetation on grasslands, or gradual encroachment that obscures the earlier status. Forest expansion partly results from agricultural and pastoral abandonment. OFB reports substantial woody encroachment, particularly affecting wet, Alpine, subalpine and less-productive grasslands, with losses of open-habitat biodiversity. Although recent national grassland area is broadly stable, local conversion remains probable. Specified Risk applies to stands established or naturally regenerated after 2007 where historical evidence cannot exclude formerly highly biodiverse grassland. Regarding TOF Landscape, the general “January 2008 land-status inspection” also applies. Where woody vegetation developed on land that was wetland, peatland or highly biodiverse grassland, the EU RED Level B assessment and this indicator investigate whether the original ecosystem was lost through natural woody succession, deliberate establishment of woody vegetation, or later land management. Biomass resulting from land conversion is ineligible; but material from operations required to conserve or

	restore the original ecosystem is assessed according to the conservation objective and resulting impacts.
Risk Rating	Specified Risk

France European areas	**Indicator**
2.2.2	Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.
Supply Base Verifiers	Legislation and regulations Forest Code (Code forestier) Environmental Code (Code de l'environnement) National Forest and Wood Programme and regional PRFBs Regional Silvicultural Management Schemes (SRGS) Applicable PSG, RTG, CBPS and ONF management documents URLs Office national des forêts (ONF) — https://www.onf.fr Centre national de la propriété forestière (CNPF) — https://www.cnpf.fr IGN — indicators of sustainable forest management — https://foret.ign.fr/IGD/en/ CNPF — sustainable-management documents — https://www.cnpf.fr/gestion-durable-des-forets/les-documents-de-gestion-durable Ministry of Agriculture — Forest Health Department — https://agriculture.gouv.fr/le-departement-de-la-sante-des-forets-role-et-missions Alliance Forêts Bois — cooperative forest management — https://www.allianceforetsbois.fr Unisylva — cooperative forest management — https://www.unisylva.fr Environmental Code — protection and sustainable management of hedges, Articles L.412-21–L.412-28 — https://www.legifrance.gouv.fr/codes/id/LEGISCTA000051372207 OFB — sustainable hedge management and damaging practices — https://ofb.gouv.fr/gerer-durablement-ses-haies-et-en-creer-de-nouvelles Ministry of Agriculture / CGAAER — hedge decline and policy assessment — https://agriculture.gouv.fr/la-haie-levier-de-la-planification-ecologique OFB — ecological, soil, water, carbon and heritage functions of hedges — https://ofb.gouv.fr/que-nous-apportent-les-haies-et-le-bocage
Risk Rating justification	• SBP benchmark: FSC — sufficiently covered; PEFC — sufficiently covered. • Trees Outside Forests: applicable in the Landscape category. • SBE France: Low Risk for public and certified forests; Specified Risk for uncertified private forests below 20 ha without a sustainable-management document and for relevant TOF Landscape. Specified risk for uncertified private forests below 20 ha without a sustainable-management document: a Plan Simple de Gestion (PSG),

	adherence to a regional Code of Good Silvicultural Practices (CBPS), or a standard management regulation (RTG). Insufficient diversification increases vulnerability to disturbances. ONF-managed public, ≥20-ha private and certified forests increasingly address these risks through management requirements. Policies and laws The Forest Code defines sustainable forest management through the long-term maintenance of ecological, economic and social functions. The national and regional forest programmes, ONF management documents and private-forest SRGS translate this into planning on stand condition, harvesting, regeneration, protection and adaptation. The detailed biodiversity sequence under 2.1.1–2.1.3 is integral to ecosystem health rather than a separate exercise. Public forests and larger private holdings are covered by systematic planning. The PSG threshold was reduced from 25 to 20 ha; holdings below it can voluntarily use a PSG, RTG or CBPS. Without such a document, ordinary legal controls still apply, but there is no equivalent routine review of the complete silvicultural sequence. Climate adaptation policy increasingly favours site-suited species, diversification and regeneration able to withstand drought, pests, storms and fire. Regarding TOF Landscape, hedges provide habitat, ecological connectivity, erosion control, water regulation, carbon storage and important landscape functions. Environmental Code Articles L.412-21–L.412-28 recognise these ecosystem services and require hedge management to maintain their agronomic, ecological and landscape multifunctionality over time. Sustainable management may include economic recovery of hedge wood, including biomass. Hedge destruction is subject to prior declaration and, where permitted, replanting compensation of at least the length destroyed. Agricultural hedges are additionally subject to CAP BCAE 8 maintenance requirements and seasonal cutting restrictions. Relevant institutes and law enforcement Forest planning follows a defined hierarchy. The Ministry of Agriculture develops the PNFB. Regional Forest and Wood Commissions, coordinated by DRAAF, prepare PRFBs. ONF prepares regional frameworks and management plans for public forests with their owners. Regional CNPF delegations prepare SRGSs and CBPSs. Private owners, often assisted by cooperatives or forestry experts, prepare PSGs; cooperatives or experts develop RTGs. CNPF approves PSGs and RTGs. DDT(M) and DRAAF oversee compliance. IGN and DSF monitor forest condition; INRAE, FCBA and RMT AFORCE develop adaptation guidance. Regarding TOF Landscape, the Prefecture and DDT(M) administer hedge declarations, applicable permissions and controls under the unified hedge regime. Requirements concerning protected species, Natura 2000, water,

	planning, heritage and agricultural conditionality can also apply. OFB and environmental inspectors investigate biodiversity offences, while CAP controls verify maintenance of eligible agricultural hedges and compliance with applicable management restrictions. Performance in practice and critical reviews French forests are under increasing drought, heat, pest and disease pressure. The management framework is progressively adapting, but poor diversification or unsuitable regeneration can increase vulnerability and reduce ecosystem functions. This is principally an assurance gap for small properties lacking a reviewed document, not evidence that all such forests are poorly managed. Regarding TOF Landscape, continued hedge decline remains a significant concern despite progressively stronger protection. The 2023 CGAAER review estimated losses at about 23,500 km per year during 2017–2021 and concluded that planting programmes had not reversed the decline. It called for stronger protection of existing hedges, improved controls, sustainable hedge-management plans and better training. This shows that destructive removal and inappropriate management remain relevant in practice. Large cooperatives such as Alliance Forêts Bois and Unisylva provide private owners with forest engineers and technicians for site assessment, silvicultural planning, regeneration and certification. Their involvement and records can materially simplify supplier assessment, especially for smallholders. Alliance Forêts Bois reports that 90% of the wood it markets is PEFC- or FSC-certified. Specified Risk is limited to the relevant uncertified small-forest and TOF situations. For both forests and TOF, the assessment must establish that pre-harvest conditions were considered and that harvesting and regeneration conserve biodiversity, vitality, ecological functions and ecosystem services. For forests, regeneration must also be expected to establish a climate- and disturbance-resilient stand. Regarding TOF Landscape, management must conserve the structure, root systems, regeneration capacity and ecological connectivity of hedges and similar woody features and avoid destructive removal or damaging operations.
Risk Rating	Specified Risk

Belgium European area	**Indicator**
2.2.2	Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.
Supply Base Verifiers	• Legislation and regulations, authorities and law-enforcement

	• Critical publications and opinions Applicable laws, regulations and policy frameworks Nature Management Plan Guide – Flanders https://natuurenbos.vlaanderen.be/sites/default/files/documenten/brochure_wegwijs_in_het_natuurbeheerplan.pdf Map of Protected Natural Sites – Brussels https://environnement.brussels/pro/outils-et-donnees/cartes/toutes-les-cartes-danalyse-nature-bruxelles#la-carte-des-sites-naturels-proteges CBD National Profile – Belgium https://www.cbd.int/countries/?country=be European Biodiversity Strategy for 2030 – FPS Public Health https://www.health.belgium.be/en/european-biodiversity-strategy-2030 Update of the National Biodiversity Strategy – Biodiversity.be https://www.biodiversity.be/6035/ Applicable laws, regulations and policy frameworks Agency for Nature and Forests – Flanders https://natuurenbos.vlaanderen.be Department of Nature and Forests – Wallonia https://environnement.wallonie.be/home/legislation/nature-et-forets.html Brussels Environment – Regional Nature Management https://environnement.brussels Analysis of practical performance by minimum and typical actors Return of the Lynx in Belgium – Onze Natuur https://www.onzenatuur.be/artikel/eindelijk-zeker-lynx-is-terug-in-belgie Wolves in Belgium – Animal Rights https://www.animalrights.be/wolven-belgi%C3%AB Biodiversity Overview – Belgium (EU) https://biodiversity.europa.eu/countries/belgium Forest Information System for Europe (FISE) – European Environment Agency https://www.eea.europa.eu/themes/biodiversity/forests/fise-the-forest-information-system Geopunt – Official Geodata Portal Belgium http://www.geopunt.be/ Critical review based on secondary sources Belgian Biodiversity Platform https://www.biodiv.be/ CBD Global Reports – Convention on Biological Diversity https://www.cbd.int/reports/ REDII Level A Risk-Based Evaluation – Wallonia (by BiomassConsult) https://energie.wallonie.be/servlet/Repository/78774.pdf?ID=78774 Biodiversity 2020: Update of Belgium's National Strategy https://www.cbd.int/doc/world/be/be-nbsap-v2-en.pdf Evaluating Landscape Attractiveness with Geospatial Data: A Case Study in

	Flanders, Belgium https://www.mdpi.com/2073-445X/10/7/703 The impact of urbanization on agricultural dynamics: a case study in Belgium https://www.tandfonline.com/doi/full/10.1080/1747423X.2020.1769211 Hedgerows as Ecosystems: Service Delivery, Management, and Restoration https://www.researchgate.net/publication/343353533_Hedgerows_as_Ecosystems_Service_Delivery_Management_and_Restoration Multifunctionality in agriculture: impact of hedgerows, grass strips and extensive grassland management on crops, regulating ecosystem services and biodiversity https://www.ugent.be/bw/environment/en/research/fornalab/publications/phd-laura-vanvooren.pdf The Precariousness of Walloon Peri-Urban Agricultural Lands https://orbi.uliege.be/bitstream/2268/297840/1/land-12-00105.pdf Supply Base Report: Extram SRL NCR-verification audit https://portal.sbp-cert.org/FileHandler.ashx?id=1ADA10B4-D572-48AD-8AA9-E0FA93CF0425 Bomen snoeien en kappen – Reglementering per regio https://www.bomen-snoeien-en-kappen.be/reglementering-per-regio.htm Immovlan – Understanding hedge trimming regulations in Belgium https://immovlan.be/en/article/54845/understanding-hedge-trimming-regulations-in-belgium The Bulletin – Wallonia to plant 4,000 km of hedgerows and a million trees by 2024 https://www.thebulletin.be/wallonia-plant-4000km-hedgerows-and-million-trees-2024
Risk Rating justification	See also indicators 1.1.1, 2.1.1, 2.1.2, and 2.2.1. Regarding the country as a whole, Belgium performs well on this indicator. The health and vitality services of the forests towards the regional ecology are good and improving. Considering the population density of Belgium, there is an good balance between ecological, social, and economical interests in the forest sector. This balance ensures the health, vitality and other services provided by forest ecosystems can be maintained and improved. Key-indicator species such as the wolf and even the lynx have returned to the forests. The black woodpecker and European honey buzzard, for example, are seen very often. The federal and regional governments have timely started investigating the challenges of climate change and are promoting a shift towards more resistant and resilient forest structures. Climate change is, however, an increasing problem, and the risks of pests, flooding and erosion will need to mitigated even more. Major natural forest disturbances are seldom in Belgium, indicating health and vitality of the forests. The general legislation and regulations on the protection of biodiversity are sufficient, however, there are also still quite many species (certain amphibians, invertebrates, reptiles, but also several mammals) under threat. The health and the vitality of the forests also attract people to enjoy the services of the forest ecosystems. Local residents and tourists recreate in the forests, making is economically possible to keep managing the remote areas and maintaining the infrastructure, which is equally important for efficiently

	maintaining the forests sustainably. Especially now, when a shift to mixed multi-age and layer forests in ongoing. Small and selective forest operations are only feasible if there already is good and extensive infrastructure. The local population benefits from several services the forest ecosystems provide, such as clean air, water, but also noise reduction, visual barriers to industries and infrastructures, profits from the industry and recreational sector. And there are mechanisms in place that provide the possibility of Stakeholder consultation To keep maintaining and improving the forest ecosystems, a collective understanding of their importance is essential, as also a low level of corruption, and a high level of rule of law. Although government and non-government organisations, public policies, protected area management, the forest harvesting industry, and the recreational sector all operate in close coordination, a regulatory gap remains in Wallonia: small private forest owners are not required to have a forest management plan or to obtain a harvesting permit (see also indicator 2.2.1). However, they must still must comply with general environmental and forestry laws. In practice, the overall performance in Wallonia is positive. Over the past decades, forestry in Belgium has undergone a fundamental shift towards promoting resilient, ecologically functional forests. A key component of this transition has been the steady increase in the area covered by mixed forests, which has already led to measurable improvements in ecosystem services, including biodiversity conservation, water regulation, climate resilience, and recreational value. In Flanders, for example, the share of forests characterised by a diversity of tree ages has doubled over the past 30 years, now reaching approximately 70%. In Wallonia, there has also been a marked decline in monoculture stands. This structural diversification contributes to greater resistance to pests, diseases, windthrow, and extreme rainfall. In Wallonia, the forest administration (Service public de Wallonie, SPW) has actively supported the conversion of vulnerable spruce monocultures to mixed-species stands as part of a broader climate adaptation strategy. This transition is visible in both public and private holdings, particularly in areas historically dominated by even-aged conifer plantations. It reflects the long-term application of forest planning tools, administrative controls, and incentive schemes that promote species diversification and site-appropriate reforestation. The current legal and administrative frameworks throughout Belgium clearly prioritise the establishment of ecologically resilient, mixed forests in both new plantations and regeneration following harvesting. In Wallonia, the replanting of tree species following harvesting or natural disturbance is governed by strict ecological suitability requirements that apply equally to private and public forests. The core legal provision is Article 40 of the Walloon Forest Code, which prohibits the planting of species that are not suited to the ecological characteristics of the site. In practice, this means that forest owners must ensure that any regeneration, whether by planting or natural processes, respects these ecological limits. As a result, spruce monocultures, for example, are effectively excluded. In public forests, these requirements are reinforced by additional obligations.

	Forest management is carried out under formally approved forest management plans, which must comply with the Forest Code and the Government of Wallonia's implementing order of 19 July 2018. These plans are subject to administrative oversight and systematically apply the species-site suitability principle. In private forests, although owners have more operational flexibility, they are fully subject to Article 40 and the same ecological standards. For larger replanting projects, notification or authorisation may be required under Article 58 of the Forest Code, triggering a review of compliance with ecological rules. Trees Outside Forests (TOF) – Landscape Feedstock (only) Landscape management in Belgium is organised regionally, with each of the three regions addressing distinct environmental and socio-economic contexts. However, practical operational challenges can raise concerns, particularly regarding the management of hedgerows, isolated trees, and other small landscape elements. In Flanders, despite structured cooperation between Regional Landscape Associations and private landowners to restore ecological and landscape values, intensive agriculture continues to exert pressure on landscape features. Concerns include habitat loss, reduced connectivity, and declining ecological resilience due to inadequate management of hedgerows and isolated trees. In Wallonia, instruments exist to manage biodiversity and landscape integrity, supported by active restoration efforts. Yet operational gaps and limited regulation still allow for the clearing or mismanagement of hedgerows, small woodlands, and isolated trees, often without adequate compensation. Agricultural and urban land use may further compromise ecological functions. In the Brussels-Capital Region, the Regional Nature Plan provides a framework for green space management, guided by ecological criteria. Nevertheless, fragmented responsibilities among local authorities can result in inconsistent implementation. Reported issues include poor pruning practices, lack of systematic tree replacement, and conflicts with infrastructure or recreational use. Although Natura 2000 sites are designated and erosion-sensitive areas mapped, the implementation of protection and management plans, particularly on private land, remains uneven. Incomplete integration of these tools into operational decisions contributes to uncertainty. Comment Foronex Although the concerns on this topic are substantiated and some issues may still occur, they are not widespread, and our company has not found significant mismanagement in recent years. Over the past decade, the management of trees and landscape elements in Wallonia has become significantly stricter. While forest operations do not always require a management plan or permit, the felling of stand-alone trees, hedgerows, and small wooded elements outside forests is increasingly subject to regulation and law-enforcement. A felling permit is often required,

	especially in urban areas, Natura 2000 zones, or for trees over a certain size. Since 2018, hedge and tree trimming is banned between 1 April and 31 July to protect nesting birds. Enforcement has improved, supported by better access to online maps and data (e.g. Walonmap), and regional initiatives aim to restore ecological values and services by planting new hedgerows and trees. These changes reflect a broader shift toward stricter controls and biodiversity conservation in landscapes. Foronex applies standard precautionary measures. All sourcing operations, including those in Trees Outside Forests — landscapes, are regularly inspected. Our company maintains long-standing relationships with its harvesting teams, and the performance of any new team is thoroughly assessed before approval. The SBE research has drawn attention to the potential for mismanagement of landscapes. Foronex will maintain awareness and continue its standard procedure of monitoring field work in practice.
Risk Rating	Low Risk

Belgium European area	**Indicator**
2.2.3	Soil quality in the Supply Base shall be maintained or enhanced
Supply Base Verifiers	• Legislation and regulations, authorities and law-enforcement • Critical publications and opinions Legislation and regulations Soil Protection Legislation – Wallonia http://environnement.wallonie.be/legis/solsoussol/sol006.htm Soil Management Decree – Navigator (Flanders) https://navigator.emis.vito.be/mijn-navigator?woId=304 Authorities and inspection agencies, law-enforcement Soil Portal – Belgian Soil Science Society http://www.soilbelgium.be/ Soil Status Database – Wallonia https://sol.environnement.wallonie.be/bdes.html ICP Forests Manual – Forest Condition Monitoring http://icp-forests.net/page/icp-forests-manual Landscape Parks in Flanders – Flemish Land Agency (VLM) https://www.vlm.be/nl/themas/platteland/landschapskwaliteit%20en%20onderhoud/landschapsparken/Paginas/default.aspx Flemish Government Recognises 9 New Landscape Parks https://www.vlm.be/nl/nieuws/Pages/Vlaamse-Regering-erkent-9-Vlaamse-Parken.aspx Internet research into critical publications FAO – Soil Pollution: A Hidden Reality

	https://www.fao.org/3/ca4519en/ca4519en.pdf Soil Country Analyses – Belgium http://www.soilbelgium.be/ Novum Sub Sole – Walloon Soil Research (2024, Issue 113) Evaluating Landscape Attractiveness with Geospatial Data: A Case Study in Flanders https://www.mdpi.com/2073-445X/10/7/703 The Precariousness of Walloon Peri-Urban Agricultural Lands https://orbi.uliege.be/bitstream/2268/297840/1/land-12-00105.pdf Hedgerows as Ecosystems – Service Delivery, Management and Restoration https://www.researchgate.net/publication/343353533_Hedgerows_as_Ecosystems_Service_Delivery_Management_and_Restoration Multifunctionality in Agriculture https://www.ugent.be/bw/environment/en/research/fornalab/publications/phd-laura-vanvooren.pdf The impact of urbanization on agricultural dynamics: a case study in Belgium https://www.tandfonline.com/doi/full/10.1080/1747423X.2020.1769211 Biodiversity 2020: Update of Belgium's National Strategy https://www.cbd.int/doc/world/be/be-nbsap-v2-en.pdf Supply Base Report: Extram SRL NCR-verification audit https://portal.sbp-cert.org/FileHandler.ashx?id=1ADA10B4-D572-48AD-8AA9-E0FA93CF0425
Risk Rating justification	General restrictions to protect soils during forestry and harvesting operations are mentioned in the forest-related legislation. 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. Elsewhere, including in private forests, environmental regulations are in effect. Usually deep soil preparations, the construction of new permanent exploitation roads or new drainage systems, fertilization, removal of leaves and needles are all prohibited. The use of chemicals, pesticides, insecticides, herbicides are generally also forbidden. Due to the great variation in topography, geology and landscapes, Belgium has a large variety of soil types. The dominant soil processes are essentially weathering, leaching, illuviation and podzolization. The state of soils are well studied, a the topic of soil protection, obtains sufficient attention. The regional authorities for forestry planning and harvesting permits are the Agency for Nature and Forests in Flanders, and the Department of Nature and Forests in Wallonia. The forest and nature agencies are involved in the approval of management plans, granting of harvesting permits (and stipulating operational conditions), sales of wood from public forests, and field verification of harvesting operations and take into account the risks to soil damage and best practices on maintaining the soil quality. Environmental restrictions have to be observed, they can be related to working on vulnerable soils, seasonal restrictions, and the creation of buffer zones. In some areas the soil needs to stay fertile, on some locations abundant nitrogen deposits (stored in biomass) can best be removed. The biomass sector plays a role in this, as it is able to market low-grade forest residues.

	Organic matter has risen in the Belgian forests over the past forty years. The deposition of airborne pollutants from the industrial areas is contributing to the effects of soil contamination in acid sandy soils. For decades, critical loads for eutrophying nitrogen have been exceeded in practically all terrestrial ecosystems (forests, semi-natural vegetation, etc.). The critical loads for acidifying compounds (nitrogen, sulphur) were exceeded in over half of the terrestrial ecosystems. It is therefore also important that forest management systems take into account their effect on the soil structure and its Ph-value (to prevent leaching). In Belgium there are many protected areas. Some of these cover the most vulnerable, and ecologically valuable kind of soils, such are wetlands and marshes (Ramsar sites), and nutrient poor grounds (often protected in Natura2000 sites). The flora and fauna is such areas can be of exceptional ecological value. Erosion prevention is a major soil issue and anti-erosion actions are being taken, such as subsidies for small scale anti-erosion works by local authorities, cross-compliance, agri-environment measures and legislation related to soil protection. One of the main responsibilities of the Department of Nature and Forests of Wallonia is forest management that respects the quality of soils and water. In this regard, it categorised 37 thousand ha as priority areas. These cover hydromorphic soils, soils with qualities of peatland, acid peat soils, slopes, watercourses and their riparian zones, springs, water catchments, and dam reservoirs. These forests are subject to particular protection measures (Circulaire 2556 of 14.04.1995, and Circulaire 2619 of 22.09.1997 'relative aux aménagements'). In the Belgian legislation, the term 'soil' includes both the solid phase and the groundwater. Next to forestry legislation and regulations that protect the quality of forest soils, there are also regional decrees that protect the soil in general. In Wallonia it is for example the 'Décret relatif à la gestion et à l'assainissement des sols' (22.03.2018) and in Flanders it is the Bodemdecreet (27.10.2006 and additions). Trees Outside Forests (TOF) – Landscape Feedstock (only) Landscape management in Belgium faces concerns over soil degradation, particularly in landscape areas that border agricultural lands or form part of semi-natural environments. Landscape elements such as hedgerows, small wooded patches, and tree lines play a crucial role in maintaining soil structure, preventing erosion, and supporting water retention. These features can be overlooked or undervalued in land-use planning. Agricultural intensification has led to the removal of landscape elements (mainly from 1950 to 1980), exposing soils to wind and water erosion, especially on sloped or unbuffered terrain. In regions like the Condroz in Wallonia, muddy floods caused by bare, compacted fields after hedge removal have led to severe sediment runoff and infrastructure damage. In parts of Flanders, the conversion of diverse field margins into larger monoculture parcels has contributed to soil loss and decreased organic matter.

	The use of heavy machinery contributes to soil compaction across landscapes, disrupting water infiltration and root development. Urbanisation is an additional pressure on landscapes. Despite regional efforts to monitor soil status, landscape-scale coordination remains weak. Soil health is often managed at the local level, without regard for the cumulative effects across larger catchments or ecological corridors. In practice, this can lead to an approach that fails to address the complexity of the interaction of landscape elements with the local environment. Comment Foronex The situation in landscape management has improved. Our company has not witnessed severe issues in recent years. This may partly be due to our long-standing cooperation with experienced harvesting teams, but our impression is that relevant requirements are more generally applied in practice. The SBE research has drawn attention to the potential for soil degradation from operations in landscapes. Foronex will remain attentive and continue its standard practice of monitoring field operations to ensure good practice is maintained.
Risk Rating	Low Risk

France European areas	**Indicator**
2.2.3	Soil quality in the Supply Base shall be maintained or enhanced
Supply Base Verifiers	Legislation and regulations Forest Code (Code forestier) Environmental Code (Code de l'environnement) Applicable SRGS and forest-management documents ONF National Forest Operations Regulation and soil-protection prescriptions URLs ONF — PROSOL soil-protection guide — https://www.onf.fr/produits-services/+/18b::prosol-guide-pour-une-exploitation-forestiere-respectueuse-des-sols-et-de-la-foret.html ONF — PRATICSOLS trafficability guide — https://www.onf.fr/onf/lonf-agit/+/192::praticsols-guide-sur-praticabilite-des-parcelles-forestieres.html ONF — National Forest Operations Regulation — https://www.onf.fr/onf/+/2e::le-reglement-national-dexploitation-forestiere-ce-quil-faut-savoir.html Centre national de la propriété forestière (CNPF) — https://www.cnpf.fr French Biodiversity Office (OFB) — https://ofb.gouv.fr OFB — sustainable hedge management and damaging practices — https://ofb.gouv.fr/gerer-durablement-ses-haies-et-en-creer-de-nouvelles OFB — ecological, soil, water, carbon and heritage functions of hedges — https://ofb.gouv.fr/que-nous-apportent-les-haies-et-le-bocage
Risk Rating justification	• SBP benchmark: FSC — sufficiently covered; PEFC — sufficiently covered.

	• Trees Outside Forests: applicable in the Landscape category. • SBE France: Low Risk for all ownership and certification categories, including TOF Landscape. The Forest Code protects soil quality and safeguards erosion-prone land. Regional forest-management schemes address soil protection. DDT(M) and authorised officers enforce the requirements in all public and private forests. The Environmental Code regulates pollution and environmental damage nationwide, including Trees Outside Forests operations. Inspections and sanctions apply irrespective of ownership or property size. Policies and laws The Forest Code requires sustainable management and protection of forest functions; the Environmental Code controls pollution, erosion-related water impacts, wetlands and protected sites. SRGS, ONF's National Forest Operations Regulation and contractual prescriptions translate these duties into traffic planning, seasonal restrictions, use of designated extraction routes, protection of watercourses and prevention of fuel or lubricant releases. Unlike some water or habitat rules, France has no single permit for every risk of forest-soil compaction. Compliance therefore combines binding environmental duties with management documents, technical standards and site-sensitive operational decisions. The ecosystem framework under 2.2.2 and water requirements under 2.2.5 are directly relevant. Relevant institutes and law enforcement ONF plans and supervises harvesting, extraction, site preparation and regeneration in public forests. Its staff identify sensitive soils, designate extraction routes, assess trafficability and erosion risks, and may suspend machinery use; contractors follow the CNPEF. In private forests, owners and operators remain responsible. CNPF assesses planned cuts and works through PSG approval against the SRGS but does not inspect every operation. DDT(M) reviews regulated cuts, clear-cuts, deforestation and water-related works; DREAL and OFB enforce environmental requirements. Trees Outside Forests fall outside ONF/CNPF supervision. Municipalities and road authorities supervise public trees; private owners supervise their trees and hedges. Relevant authorities intervene where operations affect protected trees, vulnerable soils, watercourses or wetlands. PROSOL and PRATIC'SOLS support soil-sensitivity and trafficability assessments. Performance in practice and critical reviews Forest-soil condition is monitored through the national RMQS soil-quality network and the RENECOFOR forest-monitoring network. RMQS samples approximately 2,240 sites on a 16 × 16 km grid across land uses, while RENECOFOR repeatedly measures 102 permanent forest plots. Comparison of RENECOFOR sampling periods found a 13% increase in soil organic carbon, concentrated mainly in the forest floor and upper 10 cm. Total nitrogen increased in the surface layer but declined between 10 and 40 cm, increasing the carbon-to-nitrogen ratio. Carbon accumulation improved

	exchange capacity and nutrient retention in some soils. However, highly acidic and poorly buffered soils continued to acidify, with declining pH and base saturation and increasing exchangeable aluminium. National averages therefore conceal continuing deterioration in sensitive forest soils. Heavy machinery can cause local compaction and rutting, especially on wet, fine-textured or steep soils. Available guidance treats this as a recognised operational risk, but the review found no evidence of frequent or structural non-compliance across metropolitan feedstock sourcing. Regarding TOF Landscape, hedges and other woody features can provide important soil-protection functions independent of their standing volume. Hedgerows on slopes and banks reduce runoff and sediment movement, while roots, litter and adjoining vegetation stabilise and enrich soils. Coppicing and pollarding normally retain these functions, whereas grubbing, stump removal, damage to banks or repeated heavy-machinery traffic can impair them. OFB guidance therefore distinguishes sustainable wood recovery from destructive removal of the supporting soil structure. The risk is low, as legal controls and sector practices are generally effective. Operators remain fully responsible for preventing soil damage, but systematic inspection of every site is not required. Any indication of rutting, erosion, fuel leakage, inappropriate machinery use or work under unsuitable soil conditions identified during routine or sample inspections triggers further investigation and increased inspection of the supplier until satisfactory performance is confirmed. SBP requires Certificate Holders to evaluate suppliers' operational performance, including whether soil compaction and degradation are avoided, at least annually and more frequently where risks are known or expected.
Risk Rating	Low Risk

France European areas	**Indicator**
2.2.4	Where the removal of harvest forest residues and/or stumps occurs, this shall not lead to irreversible negative impacts to the ecosystem.
Supply Base Verifiers	Legislation and regulations Forest Code (Code forestier) Environmental Code (Code de l'environnement) ONF National Forest Operations Regulation Forest Soil Action Plan 2025 URLs Ministry of Agriculture — Forest Soil Action Plan — https://agriculture.gouv.fr/sols-forestiers ONF — National Forest Operations Regulation — https://www.onf.fr/onf/+/2e::le-reglement-national-dexploitation-forestiere-ce-

	quil-faut-savoir.html ADEME — forest harvesting and environmental guidance — https://librairie.ademe.fr Environmental Code — protection and sustainable management of hedges, Articles L.412-21–L.412-28 — https://www.legifrance.gouv.fr/codes/id/LEGISCTA000051372207 OFB — sustainable hedge management and damaging practices — https://ofb.gouv.fr/gerer-durablement-ses-haies-et-en-creer-de-nouvelles OFB — ecological, soil, water, carbon and heritage functions of hedges — https://ofb.gouv.fr/que-nous-apportent-les-haies-et-le-bocage
Risk Rating justification	• SBP benchmark: FSC — sufficiently covered; PEFC — sufficiently covered. • Trees Outside Forests: applicable in the Landscape category. • SBE France: Low Risk for all ownership and certification categories, including TOF Landscape. Stump and root extraction is very rare in France. France's 2025 Forest Soil Action Plan recommends avoiding stump and root harvesting; ONF contracts require stump retention, while ADEME guidance calls for site-sensitivity assessment and residue retention. Cutting permits or local rules may impose further restrictions. Extraction may sometimes be necessary in stands affected by root rot. Policies and laws The soil and ecosystem framework is described under 2.2.2 and 2.2.3. The Forest and Environmental Codes set no universal residue-retention percentage or blanket national ban on stump extraction. Decisions must be site-specific, covering both removal quantities and treatment of remaining material. Management documents and ONF prescriptions normally retain stumps, coarse roots, deadwood and sufficient fine residues to protect nutrients, soil carbon, habitats and soils. Residues may be spread, retained in habitat piles or placed on extraction routes, while keeping watercourses clear. More extensive removal may be justified for habitat restoration, regeneration, sanitary management or fire prevention. The 2025 Forest Soil Action Plan and ADEME/ONF guidance emphasise site sensitivity and proportionality; biomass demand alone does not justify damaging extraction. Relevant institutes and law enforcement ONF specifies and monitors residue and stump management in public forests, including material retained, distribution, extraction routes, ground conditions, erosion protection and regeneration. In private forests, owners and operators remain responsible. CNPF assesses planned harvesting, soil preparation and regeneration through PSG approval against the SRGS but does not inspect every operation. DDT(M) handles regulated cuts, deforestation and water-related authorisations; DREAL and OFB control impacts on water, wetlands, habitats and species. The Forest Health Department may assess sanitary justification; prefectural services and SDIS may advise where residues affect wildfire prevention. Trees Outside Forests fall outside ONF/CNPF supervision: municipalities and road authorities

	supervise public sites, while private owners supervise their land. INRAE, FCBA, ADEME and ONF guidance supports decisions concerning nutrient balance, soil damage, deadwood and regeneration. Performance in practice and critical reviews Stump harvesting is rare, whereas harvest-residue recovery is a normal but site-dependent operation. Excessive removal may reduce nutrient stocks, soil carbon, deadwood and habitat structures or increase erosion and compaction. Excessive retention may obstruct regeneration, maintain sanitary or fire hazards, or conflict with restoration of open, nutrient-poor habitats. Neither complete retention nor a fixed retention percentage is therefore universally appropriate. The review found no frequent or structural harmful removal in metropolitan feedstock sourcing. Low Risk depends on checking soil fertility, slope, moisture, harvesting frequency, retained deadwood, regeneration and sanitary, habitat or fire objectives. Any root or stump consignment receives thorough investigation. Complete residue removal requires documented site justification; unexplained removal or irreversible harm makes the biomass non-compliant. Regarding TOF Landscape, biomass from hedges, pollards, riparian trees and small coppice features is acceptable where the landscape element and its biodiversity functions are maintained. This can include cutting individual trees, coppicing or pollarding, provided that sufficient structure, roots and regeneration capacity remain. Complete hedge removal, stump extraction or other operations that destroy the feature are not considered compliant.
Risk Rating	Low Risk

Belgium European area	**Indicator**
2.2.4	Where the removal of harvest forest residues and/or stumps occurs, this shall not lead to irreversible negative impacts to the ecosystem.
Supply Base Verifiers	• Legislation and regulations, authorities and law-enforcement • Critical publications and opinions Flemish Environmental Code – Vegetation Decree and Management Obligations https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1003183¶m=informatie Natura 2000 and Forests – EU Commission Management Guidelines http://ec.europa.eu/environment/nature/natura2000/management/docs/Final%20Guide%20N2000%20%20Forests%20Part%20I-II-Annexes_de.pdf VCG.AI – Forest Residues as Bioresources in Circular Bioeconomy https://vcg.ai/forest-residues-as-bioresources-in-circular-bioeconomy/

	Natuur en Bos – Duurzaam Bosbeheer https://www.natuurenbos.be/beleid-wetgeving/natuurbeheer/duurzaam-bosbeheer Bosgroepen Vlaanderen – Bosbeheer en Biodiversiteit https://www.bosgroepen.be/bosbeheer-en-biodiversiteit/ European Forest Institute – Forest Biomass for Energy in the EU https://efi.int/publications-bank/forest-biomass-energy-eu-current-trends-carbon-balance-and-sustainable-harvesting Vlaamse Milieumaatschappij – Impact van Houtoogst op Bodem en Biodiversiteit https://www.vmm.be/publicaties/impact-van-houtoogst-op-bodem-en-biodiversiteit See also indicator 2.2.3.
Risk Rating justification	Forest residues can be defined as all above-ground biomass left on the ground after timber harvesting operations (branches, tops, small low-grade logs and undesired undergrowth shrubs, etc), but exclude stumps, coarse roots and fine roots. Regarding coniferous forests, around 10 to 15 % of the total above ground biomass is left behind as forest residues during regular harvesting activities (20–30% in the first commercial thinning but only 4–5% in the final harvest). However, this share can vary considerably and reach up to 50% depending on the conditions. Values of around 25% of residue are usual in European broadleaved forests. Forest regulations often demand a part of the forest residues are left onsite for ecological reasons. Within forest certification, it can also be required the leave a certain share of biomass in the forest to protect soil fertility and biodiversity. In Wallonia it is common practice to remove big branches and tree tops after felling operations, either for the production of biomass feedstock, or for firewood. Leaves and twigs are left in the forest, as also some of the larger residues. Belgian forests have been accumulating huge amounts of organic matter for the last 40 years. For decades, maybe a century, critical deposit loads for eutrophying elements have been exceeded in practically all terrestrial ecosystems (forests, semi-natural vegetation, etc.). The critical loads for acidifying compounds have also been exceeded in over half of the terrestrial ecosystems. The excessive deposits (like nitrogen) from regional industries and human activity, have influenced the ecosystems of usual forests and high-value protected nature reserves. The (partly) removal of forest residues therefor normally does not harm the soil and biodiversity, but improves it. On the other hand, rotting forest residues create methane gasses, dry residues can catch fire, and too many weak trees and dead wood can increase the risk of a pest outbreaks. Next to nutrient balance and biodiversity, the operations (with forestry machines) should be executed accurately, to avoid damage to ecosystems (see also indicator 2.2.5). The current forest regulations consider these aspects. These are reflected in the approved management plans and harvesting permits. Most forests in Belgium fall under a management plan, or the harvest

	operations fall under a permit. Private owners in Wallonia (outside protected areas), however, do not have to have a harvesting plan, or a permit. But large private forest owners, including nature conservation organizations, will generally have them. Trees Outside Forests (TOF) – Landscape Feedstock (only) In the context of landscape management in Belgium, the removal of harvest residues and stumps must not lead to irreversible negative impacts on ecosystems. This principle is embedded in regional environmental and land-use regulations. Oversight of such activities lies primarily with the Service public de Wallonie (SPW) in Wallonia and the Agentschap voor Natuur en Bos (ANB) in Flanders. Land-use designations, including the plan de secteur in Wallonia and the spatial implementation plans in Flanders, regulate interventions on parcels, including tree and stump removal. Buffer zones along waterways and erosion-prone areas are often included in environmental zoning, but the extent to which these restrictions are visible, enforced, and integrated into local operations can vary significantly, particularly in small scale landscapes. Decades of nitrogen and other nutrient deposition across Belgium, largely from agriculture and transport, have caused widespread nutrient oversaturation in soils, exceeding critical ecological thresholds in most terrestrial ecosystems. In this context, the partial removal of forest residues such as branches and tops is generally not ecologically harmful and may, in fact, help restore nutrient balance. Removing excess organic matter can also reduce risks of eutrophication, pest outbreaks, methane emissions, and fire hazards in unmanaged zones. However, even where nutrient loads are high, the ecological functions of harvest residues in landscapes remain important. Retaining part of the biomass on site contributes to maintaining soil structure, controlling erosion, preserving habitat connectivity, and supporting microclimate stability, particularly in fragmented, sloped, or semi-natural areas. Stump removal is rarely practiced in landscape contexts and only occurs when necessary for the parcel's intended land use, such as conversion for infrastructure development. Such operations are expensive and not conducted for biomass extraction. They fall under zoning restrictions and must be justified within the applicable land-use framework.
Risk Rating	Low Risk

Belgium European area	**Indicator**
2.2.5	Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.
Supply Base Verifiers	• Legislation and regulations, authorities and law-enforcement • Critical publications and opinions Walloon Environmental Legislation – Nature and Forests

	https://environnement.wallonie.be/home/legislation/nature-et-forets.html EU Water and Floods Directives – Country implementation summary https://www.cbd.int/countries/?country=ie Direction Générale Agriculture, des Ressources Naturelles et de l'Environnement (DGARNE) – Wallonia https://iucn.org/our-union/members/iucn-members/direction-generale-agriculture-des-ressources-naturelles-et-de Analysing and evaluating flood risk governance in Belgium https://climate-adapt.eea.europa.eu/en/metadata/publications/analysing-and-evaluating-flood-risk-governance-in-belgium-dealing-with-flood-risks-in-an-urbanized-and-institutionally-complex-country Flemish flooding incidents from 2024 recognised as disasters https://www.brusselstimes.com/1343511/flemish-flooding-incidents-from-2024-recognised-as-disasters Wallonia places 13 rivers on high flood alert https://www.brusselstimes.com/1384965/wallonia-places-13-rivers-on-high-flood-alert FlashFloodBreaker Project – Enhancing resilience against flash floods https://flashfloodbreaker.nweurope.eu/ How Flanders is harnessing nature to prevent deadly floods https://www.euronews.com/green/2024/06/18/how-flanders-is-harnessing-nature-to-prevent-deadly-floods Blind spots in Belgian flood risk governance https://cris.unu.edu/blindspotsinbelgianfloodriskgovernance Flood alerts issued for rivers in Wallonia and Flanders https://brusselsmorning.com/flood-alerts-issued-for-rivers-in-wallonia-and-flanders/65545 Flood Risk Map – Walloon Region https://www.arcgis.com/apps/View/index.html?appid=15b6c0fc0bce4bf093e7081f114278d7 Comparing flood forecasting and early warning systems in transboundary river basins https://egusphere.copernicus.org/preprints/2025/egusphere-2025-828/egusphere-2025-828.pdf European State of the Climate 2024 – Flooding https://climate.copernicus.eu/esotc/2024/flooding
Risk Rating justification	In Belgium, the protection of ground water, surface water, and downstream water flows is embedded in both national and regional legal frameworks, and closely tied to EU directives and international cooperation. The EU Water Framework Directive (2000/60/EC) and the EU Floods Directive (2007/60/EC) have been transposed into regional laws and form the legal basis for water protection, including in forested areas. Regional authorities—namely the Agentschap voor Natuur en Bos (ANB) in Flanders, the Département de la Nature et des Forêts (DNF) in Wallonia, and Bruxelles Environnement—are responsible for the approval and enforcement of forest management plans and harvesting permits, ensuring that forest operations do not deteriorate the natural condition of soil and water systems. Belgium also cooperates internationally through river basin commissions to

	manage water quality and flood risks in shared catchments. This includes active participation in the International Commission for the Meuse (ICM) and the International Commission for the Moselle and the Saar (ICPMS). These structures enable cross-border coordination with France, Germany, Luxembourg, and the Netherlands. Shared early warning systems and flood risk management plans are in place and updated every six years in line with EU law. While Belgian forest regulations do not formally classify forests by functions such as flood protection or erosion control, such aspects are effectively covered through general forestry law. The issuance of felling licences and management plans is subject to environmental safeguards, including minimising erosion, runoff, and flood risks—particularly in hilly terrain or valley zones. Regional forest agencies evaluate ecological sensitivity before approving any operations, and in public forests they themselves implement management measures in line with legal obligations. In Wallonia, the DNF has identified around 37,000 hectares of public forest as priority zones for the protection of sensitive soils and water resources. These areas include hydromorphic soils, peatlands, steep slopes, riparian zones, springs, water catchments, and dam basins, and are subject to specific conservation measures. Belgium also implements EU directives on drinking water, and water catchment protection is integrated into regional policy frameworks. Restrictions on pesticide and fertiliser use in or near forests contribute to the protection of water quality. There is no indication in national or international literature that forest management contributes negatively to the quality of drinking water in Belgium. Compliance with environmental regulations is standard practice for both public and private forest owners and operators. The recent impacts of climate change, including episodes of flash flooding, have led Belgian authorities to adopt more climate-resilient forestry strategies. Forests are increasingly managed not only for biodiversity and timber, but also for their water retention and buffering capacities, with future plans expected to further integrate flood prevention into forest policy. Trees Outside Forests (TOF) – Landscape Feedstock (only) The legal and administrative framework for water protection in Belgium applies equally to landscape elements, urban parks, and other managed green spaces. These frameworks are based on the EU Water Framework Directive (2000/60/EC) and the EU Floods Directive (2007/60/EC), both of which have been transposed into regional legislation. Oversight is provided by the regional authorities responsible for environmental and forest management, alongside local municipal administrations. In urban and peri-urban landscapes, water management is primarily oriented toward stormwater control and drought mitigation. Commonly applied measures include retention basins, infiltration zones, and vegetated stormwater buffers. In Wallonia, temporary immersion basins have been implemented to reduce flood risk and improve surface water regulation in

	flood-prone areas. Flanders has similarly adopted natural water retention strategies and climate-adaptive spatial planning tools, as outlined in its flood risk management plans. Water catchment protection is also integrated into regional planning frameworks. Measures such as limiting impervious surfaces, preserving riparian vegetation, and promoting groundwater infiltration contribute to the protection of drinking water resources and the overall resilience of landscape ecosystems. These actions are supported by land zoning instruments, conservation regulations, and urban development codes, which help ensure that ecological function is maintained. Nature-based solutions, including floodable parks, urban wetlands, and vegetated corridors, are increasingly incorporated into land-use strategies. These contribute to reduced runoff, enhanced water retention, and improved ecological connectivity, supporting both climate resilience and biodiversity.
Risk Rating	Low Risk

France European areas	**Indicator**
2.2.5	Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.
Supply Base Verifiers	Legislation and regulations Environmental Code (Code de l'environnement) Public Health Code (Code de la santé publique) Directive 2000/60/EC establishing the Water Framework Directive Applicable SDAGE, SAGE, catchment-protection and water-law instruments ONF operational prescriptions for watercourses and wetlands Forest Code (Code forestier), water- and soil-protection provisions Directive 2006/118/EC on protection of groundwater against pollution and deterioration Directive (EU) 2020/2184 on the quality of water intended for human consumption Directive 2007/60/EC on assessment and management of flood risks URLs Ministry for Ecological Transition — flood prevention and flood-risk planning — https://www.ecologie.gouv.fr/politiques-publiques/prevention-inondations Cerema — GEMAPI and integrated catchment management — https://www.cerema.fr/fr/actualites/appel-partenaires-exercer-gemapi-cadre-gestion-globale-eau INRAE — forest cover and catchment hydrology — https://hal.inrae.fr/hal-02581808v1/document Eaufrance — water information and management — https://www.eaufrance.fr French water agencies — https://www.lesagencesdeleau.fr ONF — guidance on crossing a watercourse — https://www.onf.fr/onf/lonf-agit/+/18d::franchir-un-cours-deau.html

	INPN — national natural heritage inventories and protected-area data — https://inpn.mnhn.fr French Biodiversity Office (OFB) — https://ofb.gouv.fr OFB — ecological, soil, water, carbon and heritage functions of hedges — https://ofb.gouv.fr/que-nous-apportent-les-haies-et-le-bocage Environmental Code — watercourse maintenance and ecological-status duties — https://www.legifrance.gouv.fr/codes/section_lc/LEGITEXT000006074220/LEGISCTA000006176469/
Risk Rating justification	• SBP benchmark: FSC — sufficiently covered; PEFC — sufficiently covered. • Trees Outside Forests: applicable in the Landscape category. • SBE France: Low Risk for all ownership and certification categories, including TOF Landscape. Environmental and Public Health Codes, SDAGE/SAGE plans, catchment-protection zones and authorities restrict pollution, crossings, drainage and erosion across ownership types. Forestry is not a principal cause of poor water status; climate change and agricultural pollution are more significant pressures. These are addressed through river-basin planning. Related indicators on ecosystem services and resilience are Specified Risk. Policies and laws The Environmental Code implements water management through basin-level SDAGEs, local SAGEs, water-law procedures and prohibitions on pollution. Drinking-water abstraction protection is established under the Public Health Code. Wetlands, riparian habitats and Natura 2000 sites can add stricter requirements. These rules apply to public and private forests and to Trees Outside Forests. Forest operations must avoid direct pollution, excessive sediment, obstruction of water flow and unauthorised works in watercourses or wetlands. ONF and regional guidance address bridge or culvert installation, extraction routes, buffer zones, fuel handling and restoration of crossings. Soil protection under 2.2.3 and pesticide controls under 2.2.7 provide supporting safeguards. Regarding TOF Landscape, riparian trees and hedges can reduce runoff, trap sediment and nutrients and stabilise banks. Article L.215-14 of the Environmental Code requires regular watercourse maintenance to preserve natural flow and contribute to good ecological status and allows selective pruning or coppicing. Bank consolidation, riparian removal and other works affecting water usually require a water-law procedure. Relevant institutes and law enforcement Water agencies and basin committees prepare SDAGEs; local water commissions prepare SAGEs. DDT(M), DREAL, OFB, regional health agencies and prefects authorise and control activities. ONF and CNPF integrate mapped catchments, watercourses and wetlands into management advice and plans.

	Performance in practice and critical reviews Agriculture, urbanisation, hydromorphological change and climate pressure dominate French water assessments. Forestry can nevertheless cause local damage through unsuitable crossings, rutting, drainage, sediment or accidental releases. At catchment level, increasing attention is given to rapid runoff, flash floods and downstream peak flows. PGRI, PAPI, SAGE and GEMAPI programmes analyse upstream-downstream hydrology and promote infiltration, slower runoff and restoration of wetlands, floodplains and riparian areas. Forest soils and continuous cover can support water retention. Catchment and flood-risk planning increasingly recognises the value of establishing or restoring forests and Trees Outside Forests, including hedgerows, wooded buffer strips and riparian trees, at strategic locations. These features increase infiltration, slow surface runoff and can make a substantial regional contribution to reducing peak river flows during heavy rainfall. Historical VigiEau data show recurring seasonal water restrictions, particularly in western and south-western France, although the affected areas vary between years. Public national maps identify many drinking-water-catchment supply areas. However, the legally operative immediate, close and distant protection perimeters and their site-specific public-utility-declaration requirements are not consistently available through one unrestricted national operational map. Where these restrictions cannot be verified from public mapping or forest-management documents, information must be obtained from the municipality, drinking-water operator or regional health authority before harvesting or chemical use proceeds. The indicator remains Low Risk. Sourcing biomass near vulnerable catchments, or on wetlands, peatlands always obtains a closer review (through other indicators). Conditions attached to protected drinking-water catchments, flood-risk measures or water-law authorisations are binding.
Risk Rating	Low Risk

France European areas	**Indicator**
2.2.6	Air emissions shall comply with national legislation or in the absence of national legislation with industry best practice.
Supply Base Verifiers	Legislation and regulations Environmental Code (Code de l'environnement) Public Health Code (Code de la santé publique) Regulation (EU) 2016/1628 on non-road mobile machinery emissions Applicable prefectural orders on burning and fire prevention URLs Ministry for Ecological Transition — DREAL/ICPE environmental inspection

	— https://www.ecologie.gouv.fr/politiques-publiques/installations-classees-protection-lenvironnement Ministry for Ecological Transition — market surveillance of vehicles and non-road mobile machinery engines — https://www.ecologie.gouv.fr/politiques-publiques/service-surveillance-du-marche-vehicules-moteurs-ssmvm MSA — occupational health and safety guidance for the forestry sector — https://ssa.msa.fr/filiere/filiere-bois/ Service-Public — prohibition, enforcement and penalties concerning green-waste burning — https://www.service-public.fr/particuliers/vosdroits/F31858 EUR-Lex — European Union law — https://eur-lex.europa.eu/homepage.html Ministry for Ecological Transition — air quality — https://www.ecologie.gouv.fr/politiques-publiques/pollution-lair-origines-situation-impacts European Commission — non-road mobile machinery — https://single-market-economy.ec.europa.eu/sectors/automotive-industry/environmental-protection/non-road-mobile-machinery_en ADEME — restrictions on open burning — https://agirpourlatransition.ademe.fr/particuliers/maison/dechets/faire-dechets-verts
Risk Rating justification	• SBP benchmark: FSC — partially covered; PEFC — sufficiently covered. • Trees Outside Forests: applicable in both Landscape and Urban categories. • SBE France: Low Risk for all ownership and certification categories and for TOF Landscape and Urban. Forestry emissions arise mainly from diesel machinery and occasionally from residue burning. New forestry engines require type approval and must meet Stage V limits under Regulation (EU) 2016/1628 and the French Environmental Code. Conformity is subject to surveillance. Residue burning is governed by the Forest Code and prefectural rules. An internet review found no air-emission compliance issues in French forestry. Policies and laws The Environmental Code establishes the framework for air quality, pollutant emissions and classified installations. Regulation (EU) 2016/1628 sets emission and type-approval requirements for engines used in non-road mobile machinery. Vehicles, engines and fuels are subject to EU and national standards. Employers must maintain equipment in proper working condition and limit worker exposure to exhaust, smoke and harmful substances. Open burning of waste is generally prohibited. Burning forest residues is governed by environmental, public-health, forest-fire and departmental prefectural rules. It may be permitted under specified sanitary, forest-management or fire-prevention conditions but prohibited during elevated fire risk or air-pollution episodes. Landscape and urban Trees Outside Forests are equally subject to applicable waste, air-quality, nuisance and fire-prevention requirements.

	Regarding TOF Landscape and Urban, operations use chainsaws, chippers, loaders and road vehicles subject to applicable engine, maintenance and air-quality requirements. Urban operations may additionally affect nearby residents and traffic and are subject to local nuisance and worksite rules. Open burning of garden and park green waste is prohibited except under narrowly defined exemptions; woody material intended for lawful material or energy recovery is collected and processed rather than burned on-site. Relevant institutes and law enforcement ONF sets and supervises operational requirements in public forests. CNPF advises private owners on residue management and departmental rules governing burning and fire prevention but does not systematically inspect individual operations. DREAL and prefectural services administer air-quality rules, pollution restrictions and classified installations. Municipal authorities and police enforce local burning and nuisance provisions. DDT(M), OFB, authorised ONF officers and the gendarmerie may inspect the use of fire in and around forests; SDIS supports fire prevention and emergency response. Market-surveillance and customs authorities control machinery and engine conformity, while the Labour Inspectorate and MSA supervise equipment maintenance and worker exposure to exhaust, smoke and harmful substances. Performance in practice and critical reviews National inventories attribute only a very small proportion of combined agricultural and silvicultural emissions to forestry, mainly exhaust from mobile machinery. Open burning can nevertheless generate high local concentrations of fine particles and other incomplete-combustion pollutants, particularly from wet residues. Continued burning of household green waste is documented and remains relevant to small-scale landscape and urban tree maintenance. Professional forest operations generally retain, chip or recover residues. No frequent or structural forestry-specific pattern of illegal burning or non-compliant machinery emissions was identified. Low Risk is concluded because applicable laws, machinery standards and enforcement arrangements are in place, and governmental, sectoral and independent sources identified no frequent or structural non-compliance. Any possible violation observed during an on-site inspection, reported by a business partner or raised through stakeholder comments or complaints triggers additional investigation.
Risk Rating	Low Risk

Belgium European area	**Indicator**
2.2.6	Air emissions shall comply with national legislation or in the absence of national legislation with industry best practice.

Supply Base Verifiers	• Legislation and regulations, authorities and law-enforcement • Critical publications and opinions Legislation and regulations EU Air Quality – Overview of Policies https://environment.ec.europa.eu/topics/air/air-quality_en EU Air Quality Standards – Legal Framework Summary https://environment.ec.europa.eu/topics/air/air-quality/eu-air-quality-standards_en Directive 2008/50/EC on Ambient Air Quality and Cleaner Air for Europe https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32008L0050 Directive 2004/107/EC on Arsenic, Cadmium, Mercury, Nickel and PAHs in Ambient Air https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32004L0107 Directive 2015/1480/EU on Sampling, Analysis and Reporting of Ambient Air Quality https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32015L1480 Commission Decision 2011/850/EU – E-Reporting and Data Quality https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1529998035942&uri=CELEX:32011D0850 Regulation (EU) 2016/1628 – Emission Limits for Non-Road Mobile Machinery https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32016R1628 Authorities and inspection agencies, law-enforcement Federal Public Service Health – Air & Environment https://www.health.belgium.be/en/environment/air E-Reporting Country Monitoring – Air Quality Portal (EEA) https://eeadmz1-cws-wp-air02.azurewebsites.net/index.php/reporters-corner/e2a-data-monitor-country-and-stations/ Internet research into critical publications IQAir – Belgium Air Quality Rankings and PM2.5 Data https://www.iqair.com/belgium EEA – Belgium Air Pollution Country Fact Sheet 2024 https://www.eea.europa.eu/en/topics/in-depth/air-pollution/air-pollution-country-fact-sheets-2024/belgium-air-pollution-country-fact-sheet-2024 AirClim – Belgium Must Act to Limit PM Pollution https://www.airclim.org/acidnews/belgium-must-act-limit-pm-pollution ClientEarth – Belgians Sue Government Over Air Pollution https://www.clientearth.org/latest/press-office/press-releases/belgians-follow-german-citizens-sue-government-over-air-pollution-human-rights-issues/
Risk Rating justification	Belgium's air emissions from forestry are regulated under a comprehensive legal framework that transposes the EU Ambient Air Quality Directive (2008/50/EC), the National Emission Ceilings Directive (2016/2284/EU), and the Regulation on Non-Road Mobile Machinery (EU 2016/1628). These provisions are implemented at the regional level: in Flanders through VLAREM II, in Wallonia through the Executive Order of 11 April 2019, and in the Brussels-Capital Region via the Executive Order of 17 January 2019 and the Ordinance of 19 March 2020. The competent authorities are the

	Agentschap voor Natuur en Bos (ANB) in Flanders, the Département de la Nature et des Forêts (DNF) in Wallonia, and Brussels Environment (IBGE-BIM) in the capital region, with coordination at federal level provided by the Federal Public Service Health, Food Chain Safety and Environment. Internet research did not find publications, articles or complaints on significant adverse effects on air quality or pollution from forest management activities in Belgium. Forest operations are generally small in scale and mechanised using equipment that is subject to the EU regulation on non-road mobile machinery emissions. Tractors, harvesters, and other machinery used in forestry must meet these requirements, ensuring that emissions remain within regulated thresholds. Practices such as prescribed burning, which contribute to air pollution in other regions, are not commonly applied in Belgium's forestry sector. Belgium participates in the European Air Quality e-Reporting system managed by the European Environmental Agency, and relevant data are published through the European Air Quality Portal. The most recent figures indicate that Belgium's average PM2.5 concentration in 2024 was 8.89 µg/m³, which is 1.8 times the World Health Organization's recommended limit. According to IQAir, this places Belgium 105th globally for PM2.5 exposure, within the moderate range by international comparison. The European Environment Agency's 2024 factsheet on Belgium notes that while national progress has been made, air pollution in urban centres remains a concern, particularly due to exceedances in nitrogen dioxide and fine particulate matter. These issues, however, are linked primarily to urban transport and residential heating, not to forest operations. There is no indication from national or international sources that the Belgian forestry sector contributes significantly to air quality degradation. Current practices comply with EU legal requirements and standards. Trees Outside Forests (TOF) – Landscape Feedstock (only) For landscape feedstock the same applies as above.
Risk Rating	Low Risk

Belgium European area	**Indicator**
2.2.7	Pesticides shall only be used as part of an Integrated Pest Management (IPM) plan in compliance with national legislation, chemical safety data sheets and industry best practice. Banned pesticides shall not be used.
Supply Base Verifiers	• Legislation and regulations, authorities and law-enforcement • Critical publications and opinions Directive 2009/128/EC on the sustainable use of pesticides https://eurlex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:309:0071:0086:en:PDF NAPAN – Nationaal Actie Plan d'Action National https://fytoweb.be/nl/reductieplan/nationaal-actie-plan-daction-national-napan Public consultation on the 2018–2022 NAPAN programme

	https://fytoweb.be/nl/reductieplan/overleg/napan/openbaar-onderzoek-over-het-programma-2018-2022-van-het-nationaal Belgium's National Action Plan – Notification to the EU https://food.ec.europa.eu/system/files/2019-03/pesticides_sup_nap_bel_en.pdf Royal Decree of 28 February 1994 on crop protection products https://fytoweb.be/nl/wetgeving/gewasbescherming/koninklijk-besluit-van-28-februari-1994 Professional pest control sector Belgium http://www.belgianpestcontrol.be/
Risk Rating justification	The use of pesticides in Belgium is regulated under both EU and national legislation, with Directive 2009/128/EC forming the basis for national implementation through the NAPAN (Nationaal Actie Plan d'Action National) framework. This programme, coordinated by the three regional governments, aims to promote Integrated Pest Management (IPM) and reduce pesticide dependency across all sectors. Within the scope of forestry and landscape management, NAPAN has introduced strict controls that effectively prohibit the use of pesticides, herbicides, fungicides, and insecticides in and around forests, nature reserves, woodlands, and other sensitive or publicly accessible areas such as parks, water catchments, verges, and the banks of watercourses. These restrictions are reinforced by additional measures that prohibit pesticide application on road edges and verges adjacent to motorways, railways, and waterways, as well as in valleys, source areas, and locations visited by vulnerable groups. Exceptions to the general prohibition are limited to methodical and combined mechanical-chemical treatments, and only in cases of acute and unforeseeable pest threats that pose serious risks to human health, the environment, or safety, where no effective alternatives exist. In such cases, temporary derogations may be granted, provided the competent administration is notified in advance. These authorities include the Flanders Environment Agency (VMM) and the Department of Environment and Spatial Development in Flanders, the Département de la Nature et des Forêts (DNF) in Wallonia, and Bruxelles Environnement in the Brussels-Capital Region. Each regional authority is responsible for implementing and enforcing the legal framework within its territory, overseeing pesticide approvals, maintaining compliance checks, and reviewing any derogation requests. NAPAN, now in its third cycle (2013–2017; 2017–2022; 2023–2027), was also the driving force behind the 2012 ban on the use and storage of pesticides in forest and nature reserves. It defines high-risk areas both as locations used by vulnerable populations and as designated protected zones, such as Natura 2000 sites and forest reserves. Although not explicitly included in the action plan, Belgium's forest diversification strategy, shifting from conifer monocultures toward mixed, native broadleaved stands, functions as a key preventive measure under IPM by reducing vulnerability to pest outbreaks. To further minimise chemical use, preventive agronomic measures such as crop rotation, variety selection, and targeted fertilisation are applied. Additional outcomes of NAPAN include a ban on herbicide use by non-

	professionals, except for basic substances, low-risk plant protection products, and biopesticides of natural origin. All pesticide use must be logged in a spraying journal by forest owners, and any product used must have a time-limited, use-specific authorisation overseen by the relevant regional agency. These combined legal, administrative, and practical measures ensure that pesticide use in Belgian forestry and landscape management is stringently controlled, in line with IPM principles and environmental protection objectives.
Risk Rating	Low Risk

France European areas	**Indicator**
2.2.7	Pesticides shall only be used as part of an Integrated Pest Management (IPM) plan in compliance with national legislation, chemical safety data sheets and industry best practice. Banned pesticides shall not be used.
Supply Base Verifiers	Legislation and regulations Rural and Maritime Fishing Code (Code rural et de la pêche maritime) Environmental Code (Code de l'environnement) Labour Code (Code du travail) Regulation (EC) No 1107/2009 concerning plant-protection products Directive 2009/128/EC on sustainable pesticide use Applicable product authorisations and safety data sheets URLs Légifrance — French definition and requirements for Integrated Pest Management — https://www.legifrance.gouv.fr/codes/id/LEGISCTA000026051694 EUR-Lex — Directive 2009/128/EC, requiring IPM principles for all professional users — https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02009L0128-20190726 Ministry of Agriculture — Certiphyto — https://agriculture.gouv.fr/certiphyto Ministry for Ecological Transition — pesticide pollution — https://www.ecologie.gouv.fr/politiques-publiques/pesticides-pollutions-diffuses ANSES — E-Phy authorised plant-protection products — https://ephy.anses.fr ONF — zero glyphosate in public forests — https://www.onf.fr/onf/recherche/+/46b::zero-glyphosate-en-foret-publique.html ONF — zero-phyto policy — https://www.onf.fr/onf/+/5af::zero-phyto-en-foret-publique.html
Risk Rating justification	• SBP benchmark: FSC — sufficiently covered; PEFC — sufficiently covered. • Trees Outside Forests: not applicable. • SBE France: Low Risk for all ownership and certification categories. Not applicable to TOF.

	IPM principles apply to public and private forestry. Since 2019, ONF has prohibited phytopharmaceutical treatments in all public forests and uses mechanical or biological alternatives instead. In private forests, chemical treatment is permitted within the French plant-protection framework, with integrated pest-management principles requiring priority to non-chemical methods where appropriate. A written IPM plan is not legally required. Policies and laws EU Regulation 1107/2009 and the Rural and Maritime Fishing Code govern product authorisation, sale and use; the Environmental Code adds water, species and protected-area constraints. France implements the Sustainable Use Directive through Ecophyto and integrated-pest-management principles. The user must follow the product authorisation, label and safety data sheet and prevent contamination of workers, water and non-target organisms. Authorised uses are narrow. Professional application generally requires Certiphyto. Glyphosate in forestry is restricted to specified establishment situations, nurseries and seed orchards; chemical stump devitalisation is prohibited. ONF's zero-herbicide and wider zero-phyto policies go beyond the minimum legal framework in public forests. Professional users of plant-protection products must keep a product-use record for at least three years, identifying the product, application time, dose, treated area and crop or land use. This applies when products are used in the course of professional activities, including professional forestry use. It is a treatment record for actual applications, not a requirement to prepare a separate written IPM plan; such a separate plan is not generally required for forestry. Under this SBE, products classified by the World Health Organization as Class Ia—extremely hazardous—or Class Ib—highly hazardous—shall not be used. This is an additional SBE requirement: classification in WHO Class Ia or Ib does not by itself constitute a general statutory prohibition under French or EU plant-protection-product legislation. Relevant institutes and law enforcement ANSES evaluates and authorises plant-protection products. DRAAF/SRAL and OFB conduct controls, while DDT(M), water police and protected-area managers address site restrictions. Labour Inspectorate and MSA control worker training, exposure and PPE. ONF and CNPF provide forest-specific instructions and alternatives. Performance in practice and critical reviews Forestry represents a very small share of French pesticide use, with public forests operating without herbicides. Residual risk is concentrated in plantation establishment, nurseries, seed orchards and exceptional sanitary interventions in private forests. Pesticide use in French forestry is exceptional, strictly regulated and not associated with frequent or structural non-compliance. Integrated Pest

	Management principles form part of the plant-protection requirements applicable to forestry, although a separate written IPM plan is not generally required.
Risk Rating	Low Risk

France European areas	**Indicator**
2.2.8	Waste shall be disposed of in an environmentally appropriate manner.
Supply Base Verifiers	Legislation and regulations Environmental Code (Code de l'environnement) Labour Code (Code du travail) Directive 2008/98/EC on waste Applicable hazardous-waste transport and traceability rules ONF National Forest Operations Regulation URLs Ministry for Ecological Transition — waste policy — https://www.ecologie.gouv.fr/politiques-publiques/dechets Trackdéchets — regulated-waste traceability — https://trackdechets.beta.gouv.fr ONF — National Forest Operations Regulation — https://www.onf.fr/onf/+/2e::le-reglement-national-dexploitation-forestiere-ce-quil-faut-savoir.html French Biodiversity Office (OFB) — https://ofb.gouv.fr Ministry for Ecological Transition — source separation and treatment of biodéchets — https://www.ecologie.gouv.fr/biodechets Service-Public — prohibition on open burning of garden green waste — https://www.service-public.fr/particuliers/vosdroits/F31858
Risk Rating justification	• SBP benchmark: FSC — sufficiently covered; PEFC — sufficiently covered. • Trees Outside Forests: applicable in both Landscape and Urban categories. • SBE France: Low Risk for all ownership and certification categories and for TOF Landscape and Urban. Forestry generates varied waste from machinery use, materials handled during operations, and workers' consumables. These fall under the French Environmental Code's general waste framework. Hazardous and specific waste streams have additional handling and traceability requirements. ONF checks public-forest operations; environmental inspectors check elsewhere. Research identified no frequent or structural forestry-related violations. Policies and laws The Environmental Code applies the waste hierarchy, producer responsibility and prohibition of abandonment or unauthorised disposal. Waste holders must characterise waste, keep hazardous streams separate and use authorised collection and treatment routes. Electronic traceability applies to relevant hazardous wastes through Trackdéchets.

	Regarding TOF Landscape and Urban, wood arising from maintenance of hedges, parks, gardens, roadside trees and other landscape features can have different legal status depending on how it is generated and managed. Where the holder discards the material, it is treated as green waste and must follow the applicable waste and biodéchets rules, including source separation and transfer to an authorised recovery route. This can include chipping, composting or energy recovery. Where wood is intentionally produced and sold as a usable biomass product, or meets the legal conditions for a by-product, it is not handled in the same way as waste. The same general waste-management duties apply in forests and to TOF operations. Waste may not be burned, buried or abandoned, and containers, oils and other pollutants may not be left or discharged on site. ONF operational specifications require contractors to remove waste and manage spills, while private contracts and certification requirements normally include comparable provisions. Contracts, delivery records and other documentation must therefore establish whether woody material is supplied as a product, by-product or waste and demonstrate that the corresponding legal route has been followed. Relevant institutes and law enforcement DREAL, OFB, municipal authorities, police and gendarmerie can investigate dumping and pollution. Labour Inspectorate and MSA address hazardous-product handling; waste operators and transporters must meet their regulatory obligations. ONF supervises public sites and can enforce contractual penalties. Performance in practice and critical reviews Illegal dumping is recurrent in some French forests, particularly accessible peri-urban forests, and can involve substantial quantities of household, construction and green waste. These deposits are mainly left by third parties and are unrelated to forestry contractors or feedstock production. Commercial operators use established waste-collection and treatment systems, while contract conditions commonly require worksites to be left clean. No structural non-compliance was identified in operational waste management within the forestry sector. Operation-related waste observed at a sourcing site—including oil or chemical containers, discarded machinery parts, burned packaging or uncontained spills—triggers investigation. Biomass acceptance is suspended until the waste and any contamination are properly addressed, and compliant disposal is demonstrated.
Risk Rating	Low Risk

Belgium European area	**Indicator**

2.2.8	Waste shall be disposed of in an environmentally appropriate manner.
Supply Base Verifiers	• Legislation and regulations, authorities and law-enforcement • Critical publications and opinions Applicable laws, regulations and policy frameworks Environmental enforcement framework – Federal https://www.health.belgium.be/fr/l-inspection-federale-de-lenvironnement Flemish waste and environmental nuisance regulation (Materials Decree context) https://omgeving.vlaanderen.be/index.php/nl/wegwijzer/de-hinder-heeft-betrekking-op-afval Flemish waste sorting and collection rules for businesses https://www.vlaanderen.be/regels-voor-sortering-en-ophaling-van-afval-bij-bedrijven Walloon Code of the Environment (including waste law and enforcement) http://environnement.wallonie.be/legis/menucode.htm Walloon decree on environmental crime (entered into force July 2022) https://www.wallonie.be/fr/actualites/delinquance-environnementale-entree-en-vigueur-du-nouveau-decret Identification of institutional roles and oversight functions (incl. law enforcement) Flemish Nature Inspectorate – general mandate and competences https://natuurenbos.vlaanderen.be/natuurinspectie https://natuurenbos.vlaanderen.be/natuurinspectie/wat-doet-de-natuurinspectie Federal Environmental Inspectorate (overview of roles) https://www.health.belgium.be/fr/l-inspection-federale-de-lenvironnement Walloon enforcement authorities – institutional roles defined under Code de l'Environnement http://environnement.wallonie.be/legis/menucode.htm Bruxelles Environnement-IBGE https://be.brussels/en/about-region/structure-and-organisations/overview-administrations-and-institutions-region/bruxelles-environnement-ibge?utm_source=chatgpt.com Analysis of practical performance by minimum and typical actors Walloon Forest Inventory (public forestry practices and control) http://iprfw.spw.wallonie.be/docs/Publication_Inventaire-forestier-wallon.pdf Flemish environmental nuisance/waste control (applied in forestry and landscape management) https://omgeving.vlaanderen.be/index.php/nl/wegwijzer/de-hinder-heeft-betrekking-op-afval Flemish Nature Inspectorate – supervision in forest and nature areas https://natuurenbos.vlaanderen.be/natuurinspectie/wat-doet-de-natuurinspectie Critical review based on secondary sources

	Walloon decree on environmental crime (press release and policy context) https://www.wallonie.be/fr/actualites/delinquance-environnementale-entree-en-vigueur-du-nouveau-decret Flemish Nature Inspectorate – operational summaries and monitoring practices https://natuurenbos.vlaanderen.be/natuurinspectie Federal enforcement framework – contextual background and interregional coordination https://www.health.belgium.be/fr/l-inspection-federale-de-lenvironnement
Risk Rating justification	Belgium maintains a robust legal and institutional framework for ensuring that forestry-related waste is disposed of in an environmentally appropriate manner. Both legal requirements and practical monitoring mechanisms are in place, supported by recent legislative improvements. Inspection intensity and enforcement are aligned with environmental risk and area designation, contributing to the low incidence of reported violations in the forestry sector. Environmental legislation in Belgium is aligned with EU law, either through directly applicable EU regulations or via the transposition of EU directives into national and regional law. Waste disposal in forests must comply with the general provisions of environmental law and specific forestry legislation. In Flanders, enforcement of waste-related provisions is covered under the Materials Decree, which regulates the prevention, collection, reuse, recycling, and disposal of waste. This Decree works in conjunction with the Forest Decree and Nature Decree, particularly in areas under protection such as Natura 2000 sites and the Flemish Ecological Network. In Wallonia, a new decree on environmental crime entered into force on 1 July 2022, updating the legal framework for prosecuting and sanctioning environmental offences, including unauthorised dumping, pollution of soil and water, and harm to protected species or areas. Additionally, Belgian law obliges all companies, including forestry contractors, to arrange for proper disposal of residual industrial waste. If the amount of waste generated is limited and within thresholds defined for household waste, companies may use the municipal waste collection system without needing a separate contract. In Flanders, the Flemish Nature Inspectorate (Natuurinspectie) is responsible for law enforcement related to forest, nature, and environmental regulations. The inspectorate is tasked with enforcing a range of decrees, including Materials (waste), Forests, Nature, Pesticides, Manure, and Hunting decree, as well as the Flemish Spatial Planning Codex. The inspectorate places special emphasis on Natura 2000 areas, the Flemish Ecological Network, forests, nature reserves, and to a lesser extent agricultural zones. The frequency of checks increases with the level of protection granted to the area. Each inspector covers approximately 450 km², which corresponds to about twelve municipalities. In Wallonia, a Strategy for Environmental Enforcement was adopted on 16 December 2021, followed by the new Decree on Environmental Crime (effective 1 July 2022). This legislation increases both financial and technical capacity at the regional and local levels to tackle environmental violations more effectively. The Public Service of Wallonia has hired 21 additional

	agents, and the new Investigation Unit for Serious Crime (replacing the former Pollution Control Unit) focuses on severe forms of environmental crime. Municipalities now receive quadruple funding to improve enforcement, and tools such as drones and surveillance cameras have been introduced. In the Brussels-Capital Region, waste management and environmental enforcement fall under the authority of Bruxelles Environnement (Leefmilieu Brussel). Although forest areas are limited (mainly the Sonian Forest, part of which lies within the region), waste disposal is strictly regulated in line with the Ordinance on Waste (1999) and EU directives. Unauthorised dumping, including in wooded or protected zones, is prohibited. Surveillance and enforcement are carried out by the environmental police and inspectors from Bruxelles Environnement, who monitor compliance in forest zones, nature reserves, and urban green spaces. As in other regions, anyone witnessing serious pollution or illegal dumping is obliged to report it. The region cooperates with neighbouring authorities (Flanders and Wallonia) for cross-boundary issues, especially within the Sonian Forest. Forest harvesting operations in Belgium are typically conducted by trained teams led by certified managers. These teams are subject to inspections by both public district officers and private forest owners. There is no known operational or economic incentive for forestry workers to improperly dispose of waste (e.g. leaving debris or spilling used oil or lubricants on site), and good practices are reinforced through training and monitoring. All waste produced during operations—whether lubricants, packaging, or residual materials—is required to be removed from site and properly disposed of. In most cases, waste is collected and managed through agreements with certified municipal or private collectors. Illegal dumping is strictly prohibited. The Materials Decree and regional regulations require not only proper disposal, but also documentation in some cases for hazardous or industrial waste streams. Companies found in violation may be sanctioned under the environmental enforcement decrees. A search of recent media, public reports, and enforcement databases did not result in cases of illegal or inappropriate waste disposal by forestry companies or individual workers in Belgium. Additionally, no cases emerged from academic or grey literature reviews. Belgian law encourages public reporting of serious pollution or waste issues. Anyone discovering significant environmental harm (e.g. large waste items, oil spills, contaminated soil) is expected to alert emergency services, such as the police or fire brigade. Trees Outside Forests (TOF) – Landscape and Urban Feedstock The same legal and enforcement framework that applies to forestry also governs waste management in landscape maintenance and harvesting operations along roads, public green spaces, and urban areas. These activities fall under regional environmental laws that transpose EU waste directives and are supported by operational rules. In Flanders, the Materials Decree governs waste prevention, collection, and disposal and applies to all landscape-related operations, including verge and roadside maintenance. The Flemish Nature Inspectorate enforces

	compliance, including in urban nature zones and roadsides, with an emphasis on protected or vulnerable areas. In Wallonia, enforcement follows the 2022 Decree on Environmental Crime and the broader Strategy for Environmental Enforcement, which extend to waste violations along roadways and in municipal green infrastructure. The Brussels-Capital Region, through Bruxelles Environnement, applies the 1999 Waste Ordinance to regulate waste disposal in parks, verges, and urban woodlands. Surveillance is supported by environmental inspectors and municipal authorities, particularly in areas like the Sonian Forest and urban green corridors. For all landscape operations, waste from maintenance and mechanical works, such as oil containers, plant residues, and packaging, must be removed and processed by authorised waste handlers. Public reporting of illegal dumping and environmental damage is encouraged and applies to all areas. Comment Foronex Foronex carries out regular field inspections and checks if harvesting teams manage waste responsibly. Littering or pollution is not accepted.
Risk Rating	Low Risk

Belgium European area	**Indicator**
2.2.9	Harvesting levels shall be justified as to how they can be sustained with reference to inventory and growth data for the Supply Base.
Supply Base Verifiers	• Legislation and regulations, authorities and law-enforcement • Inventory data, forestry data, general trends • Critical publications and opinions Walloon Environmental Legislation – Nature and Forests https://environnement.wallonie.be/home/legislation/nature-et-forets.html Bosgroepen – Houtkappen en bosbeheer https://bosgroepen.be/houtkappen/ Filière Bois Wallonie – PanoraBois 2024 https://www.filiereboiswallonie.be/sites/default/files/media-documents/FBW%20-%20PanoraBois%202024_0.pdf KBBM – Informatie over de Belgische bossen https://kbbm.be/informatie-over-de-bossen/de-belgische-bossen Walloon Forest Inventory – Main Portal http://iprfw.spw.wallonie.be/ Walloon Forest Inventory – Full Publication http://iprfw.spw.wallonie.be/docs/Publication_Inventaire-forestier-wallon.pdf State of the Environment Wallonia – Forest Resources https://etat.environnement.wallonie.be/contents/indicatorsheets/RESS%204.html Flemish Forest Inventory – Bosareaal https://www.natuurenbos.be/vlaamse-bosinventaris/Website_BosAreaal.html

	Flemish Forest Inventory – Results and Characteristics https://www.natuurenbos.be/beleid-wetgeving/natuurbeheer/bosinventaris/resultaten#karakteristieken-bosareaal FAO Global Forest Resources Assessment – Belgium https://www.fao.org/3/a-az164f.pdf FAO Open Knowledge Repository – Global Forests https://openknowledge.fao.org/server/api/core/bitstreams/12b68d70-351c-45ae-a331-c2a0d3938fcc/content National Forest Accounting Plan of Belgium https://www.natuurenbos.be/vlaamse-bosinventaris/Website_BosAreaal.html National Inventory Document (NID 1990–2022), submitted December 2024 https://unfccc.int/documents/644990 Bosinventaris Vlaanderen https://www.natuurenbos.be/beleid-wetgeving/natuurbeheer/bosinventaris/resultaten#karakteristieken-bosareaal
Risk Rating justification	In Belgium, the forest area has a higher average growth rate (increment) than in the north of France and the Netherlands, but it is lower than in Germany. Annual increment (and allowable cut) could possibly decrease in the future, as it is essential to mitigate the increased risks of climate change, like extreme weather, forest fires, and pests. The increased CO2 concentration in the atmosphere accelerates forest growth. Climate change, however, also results in, for example, periods of extreme rainfall, or drought. Today, the main challenge in order to ensure the long-term productivity of the forests is to improve their resilience to the current and expected effects of climate change. For example, outbreaks of timber-boring insects have already resulted in the loss forest plantations. In the last decades, national and regional authorities have studied this topic and successfully encouraged mitigation measures. Regulatory and financial incentives have been deployed, in particular subsidies for planting in accordance with a guide to species adapted to the present climate. The area of mixed forest stands with native, broadleaved tree species has been increased (although, in average, the growth rate of coniferous plantations is higher). More attention is also paid to the maintenance of soil fertility, and the management of water resources. The monitoring of the forests is mostly executed at the regional level by Regional Forest Inventories. The sampling protocols applied in Flanders and Wallonia are derived from traditional national forest inventory methods, while the inventory in the Brussels Region resembles a forest management assessment (the region has a small forest area of around 17 km3). The inventory results are used by policy makers and the wood industry. The three Regional Forest Acts give basic protection from overexploitation of the forests. Harvest levels are justified by means of inventory and growth data, and should not threaten forest productivity, nor the long-term economic viability of the sector. Forest inventory is managed by ANB in Flanders, DNF in Wallonia, and Bruxelles Environnement in the Brussels Region. Each agency is responsible for the data collection and the reporting within its territory. According to the Global Forest Resources Assessment for Belgium (FAO,

	FRA2020), the country's growing stock has steadily increased. The upcoming FRA2025 report is expected to offer updated insights into this trend. In Wallonia, where more than 75% of the forest area are located, a permanent forest inventory is carried out since 1994. In the last publication on inventory results the period 1994-2012 is assessed (Department of Nature and Forests – Directorate of Forest Resources Permanent inventory of Forest Resources in Wallonia, 2015). The total volume of standing timber is estimated at more than 113 million m³ based on the data available for the 2nd cycle. This overall volume, which is shared equally between public and private forests, has increased by almost 5% compared to the 1st cycle. Harvesting levels are considered practically equal to annual increment (growth) in public forests. In private forests they have been (temporarily) higher than the annual increment. For some tree species, like spruce, more is harvested than grows. Coniferous plantations are replaced by broadleaved species and mixed forests. Broadleaved species grew, more than were harvested. Based on data from 2022 National Inventory Document (NID 1990-2022), Wallonia, with the largest forest area and standing volume, has experienced a temporary overharvest (102% harvest-to-growth ratio) due to the maturation of stands planted in the 1970s. This is not indicative of long-term decline but reflects a planned, time-limited management response. Flanders reports a harvest rate of 70% against its growth, and Brussels reports 27%. Wallonia accounts for approximately 83.0% of the total annual forest felling in Belgium, followed by Flanders with 16.9% and Brussels with just 0.1%. When comparing total felling to total annual forest growth, Belgium harvested about 94.5% of its net annual increment. The average increment in Wallonia was 10.1 m³/ha.yr. 5.4 m/ha.yr for deciduous wood and 16.4 m³/ha.yr for coniferous wood. The share of broadleaved trees increased, mainly due to a decline of spruce stands with 16%. The area of mixed forests also increased significantly. The total volume of standing timber is estimated at more than 113 million m³ based on the data available for the 2nd cycle. This overall volume, which is shared equally between public and private forests, has increased by almost 5% compared to the 1st cycle. Harvesting levels are considered practically equal to annual increment (growth) in public forests. In private forests they have been (temporarily) higher than the annual increment. For some tree species, like spruce, more is harvested than grows. Coniferous plantations are replaced by broadleaved species and mixed forests. Broadleaved species grew, more than were harvested. According to the forest inventory of Flanders, the transition from homogeneous coniferous stands to more diverse forests is well underway. Data from 1997–1999 and 2009–2019 show a decline in homogeneous stands from 54.9% to 41.6%, and further to 41.4% in 2012–2021. Specifically, homogeneous coniferous stands decreased from 30.6% to 21.7%, reaching 20.7% in the latest period. Since 2000, around 18,900 hectares of homogeneous forests have been converted, increasing species diversity and structural quality. Continuous monitoring, introduced with the third forest inventory in May 2019, ensures assessment every 10 years.

	The average increment in Flanders has increased to 8.7 m³/ha.yr. 7.2 m/ha.yr for deciduous wood and 11.3 m³/ha.yr for coniferous wood. In average, annual increment is around 1 m³/ha.yr. higher in public forests than in private forests. The annual increment is also studied per tree species, ecoregion, and 'forest group'. The average stock of standing timber per ha has increased between the two measurement cycles from 216.49 m³/ha to 273.65 m³/ha. Around 70% of the annual increment is estimated to be harvested, what is a desirable level for sustainability. In only around 60% of the private forests forest harvesting is actually considered. On the basis of volume and base area Scots pine remained the most common tree species in Flanders. Although the share of forest area of Scots pine decreased from 30% to 23%, the volume of Scots pine (m3) has increased slightly anyway. The share of forests with three or more diameter classes (0-20 cm, 20-40 cm, 40-60 cm, > 60 cm) increased from an average of 39% to 68%. Related to this, the occurrence of three or more vegetation layers is now significantly higher (from 85% to 94%). FAOstat indicates domestic production of all kinds of roundwood has increased in Belgium with 5-15% between 2008 and 2020. Only the production of coniferous pulpwood stayed at the same level. In that same period, the production of fuel wood increased with 29%. Around 93% of the fuel wood is from broadleaved tree species.
Risk Rating	Low Risk

France European areas	**Indicator**
2.2.9	Harvesting levels shall be justified as to how they can be sustained with reference to inventory and growth data for the Supply Base.
Supply Base Verifiers	Legislation and regulations Forest Code (Code forestier) National Forest and Wood Programme and regional PRFBs Applicable ONF management documents, SRGS and PSGs National Forest Inventory framework URLs IGN — indicators of sustainable forest management — https://foret.ign.fr/IGD/en/ IGN — national forest inventory data — https://inventaire-forestier.ign.fr/dataIFN/ IGN — forest removals and increment indicators — https://foret.ign.fr/IGD/en/indicateurs/3.1 IGN — harvesting rate relative to net biological production — https://foret.ign.fr/IGD/fr/indicateurs/3.1 ONF — public-forest management plans and scheduled harvesting — https://www.onf.fr/vivre-la-foret/+/7f6::lamenagement-forestier-le-plan-de-gestion-durable-de-la-foret.html

	Ministry of Agriculture — authorisation of harvesting outside an approved PSG — https://mesdemarches.agriculture.gouv.fr/demarches/proprietaire-ou-mandataire/obtenir-un-droit-une-autorisation-43/article/demander-une-autorisation-245 Ministry of Agriculture — Forest Health Department — https://agriculture.gouv.fr/le-departement-de-la-sante-des-forets-role-et-missions Office national des forêts (ONF) — https://www.onf.fr CNPF — sustainable-management documents for private forests — https://www.cnpf.fr/gestion-durable-des-forets/gestion-durable/les-documents-de-gestion-durable-des-forets-privees-psg Centre national de la propriété forestière (CNPF) — https://www.cnpf.fr
Risk Rating justification	• SBP benchmark: FSC — sufficiently covered; PEFC — sufficiently covered. • Trees Outside Forests: not applicable. • SBE France: Low Risk for all ownership and certification categories. Not applicable to TOF. IGN assesses annually the net growth, mortality and removals based on rolling five-year field inventories. Regional frameworks use these data to set sustainable-harvest objectives; ONF plans for public forests and CNPF-approved plans for qualifying private forests must conform to them. Removals equal around 73% of net increment nationally, but exceed it locally in north-eastern coniferous forests affected by natural disturbances. Policies and laws The Forest Code requires sustainable management and establishes national, regional and property-level planning. Public-forest plans and private PSGs describe stands, objectives, planned cuts and regeneration. SRGS, RTG and CBPS provide regional or standard frameworks for other owners. Authorisations are required where cuts fall outside the applicable management guarantee. The 2016–2026 National Forest and Wood Programme set a historical policy objective of mobilising an additional 12 million m³ of timber annually by 2026, while maintaining sustainable and multifunctional forest management. Supporting measures included grouping small owners, shared management and harvesting operations, digital information systems such as La Forêt Bouge, improved forest access and innovative harvesting and extraction methods. This was a mobilisation target and does not demonstrate that the additional volume was achieved or was available in every region without ecological constraints. At Supply Base scale, IGN inventory provides statistically representative area, growing-stock, increment, mortality and removals data. Exceptional salvage can temporarily raise removals, but the explanation must show that longer-term harvesting is compatible with inventory, growth, mortality and recovery.

	Relevant institutes and law enforcement IGN's National Forest Inventory provides national and regional data on standing volume, increment, mortality and removals; it does not control individual harvesting operations. In public forests, ONF conducts stand assessments, prepares management plans and cutting programmes, and supervises their implementation. In private forests, CNPF assesses PSG forest descriptions, management objectives and harvesting programmes against the SRGS and approves PSGs and RTGs. DDT(M), under regional coordination by DRAAF, processes authorisations for cuts outside valid management documents and investigates unauthorised departures. The Forest Health Department documents mortality, pests and other disturbances, providing technical evidence to distinguish justified salvage harvesting from regular planned harvesting. Performance in practice and critical reviews Metropolitan forest area and growing stock have increased over the long term, while national harvest remains below net increment. Mortality has risen sharply, reducing the net sink and creating substantial salvage volumes. Some regional or species groups can therefore show removals above current increment without representing a national structural failure. The national inventory system, extensive management-planning coverage and national data showing removals below net annual increment provide strong evidence of sustainable harvesting levels.
Risk Rating	Low Risk

France European areas	**Indicator**
2.2.10	Harvested areas shall be regenerated
Supply Base Verifiers	Legislation and regulations Forest Code (Code forestier) Law No 2023-580 of 10 July 2023 and implementing rules affecting forest planning Applicable departmental clear-cut thresholds and regional Silvicultural Management Schemes (SRGS) Applicable PSG, RTG, CBPS, ONF and certification requirements URLs CNPF — reduction of the PSG threshold to 20 ha — https://ifc.cnpf.fr/actualites/abaissement-du-seuil-des-psg-20-ha CNPF — sustainable-management documents — https://www.cnpf.fr/gestion-durable-des-forets/les-documents-de-gestion-durable Ministry of Agriculture — forest renewal and adaptation — https://agriculture.gouv.fr/renouvellement-forestier Office national des forêts (ONF) — https://www.onf.fr

	Ministry of Agriculture / CGAAER — management of small private forests — https://agriculture.gouv.fr/la-gestion-des-petites-forets-privees Cour des comptes — sustainable forest management and climate adaptation, 2024 — https://www.ccomptes.fr/sites/default/files/2024-03/20240312-RPA-2024-ENPA-gestion-durable-foret-metropolitaine.pdf French Senate — public financing of the forest and wood sector, 2024 — https://www.senat.fr/rap/r23-636/r23-636_mono.html WWF France — joint NGO opinion on the 2023–2033 forest-renewal strategy — https://www.wwf.fr/sites/default/ files/doc-2023-09/2023-06-ONG-Avis-sur-strategie-pluriannuelle-renouvellement -des-forets.pdf CNPF — sustainable-management documents: PSG, CBPS and RTG — https://www.cnpf.fr/gestion-durable-des-forets/gestion-durable/les-documents-de-gestion-durable-des-forets-privees-psg CNPF — implementation of the 20-ha PSG threshold — https://ifc.cnpf.fr/actualites/abaissement-du-seuil-des-psg-20-ha National Biodiversity Committee (CNB) — opinion on forests, 2025 — https://www.avis-biodiversite.developpement-durable.gouv.fr/IMG/pdf/2025_09_avis_cnb_foret_vf_adopte.pdf IGN — indicators of sustainable forest management — https://foret.ign.fr/IGD/en/ Environmental Code — protection and sustainable management of hedges, Articles L.412-21–L.412-28 — https://www.legifrance.gouv.fr/codes/id/LEGISCTA000051372207 Rural Code / CAP conditionality — retention and seasonal cutting rules for hedges and trees — https://www.legifrance.gouv.fr/codes/id/LEGISCTA000046864533 Cerema — protection of roadside avenues and tree alignments — https://outil2amenagement.cerema.fr/outils/la-protection-des-allees-et-alignements-darbres-bordant-les-voies-ouvertes-la-circulation OFB — sustainable hedge management and damaging practices — https://ofb.gouv.fr/gerer-durablement-ses-haies-et-en-creer-de-nouvelles
Risk Rating justification	• SBP benchmark: FSC — sufficiently covered; PEFC — sufficiently covered. • Trees Outside Forests: applicable in the Landscape category. • SBE France: Low Risk for public and certified forests; Specified Risk for uncertified small private forests and relevant TOF Landscape without systematic regeneration planning. French law requires regeneration within five years after clear-cuts exceeding departmental thresholds where natural regeneration is insufficient. Since May 2025, publicly funded regeneration must demonstrate site and future-climate suitability; plantings of at least 4 ha require species diversity and cap the main species at 80%. However, private forest ownership of ⊠ ha is not legally required to regenerate climate resilient forests. Policies and laws Article L.124-6 of the Forest Code requires renewal within five years where satisfactory natural regeneration is absent, but only following clear-cuts

	exceeding thresholds established by the prefect for the department and forest massif. Approved ONF management plans, PSGs, SRGSs, RTGs, CBPSs and certification standards provide additional stand-level requirements concerning harvesting and regeneration. The PSG threshold was reduced from 25 to 20 ha in 2023, extending CNPF-approved planning. The change became operational for most newly covered holdings in July 2026; specified existing RTGs and CBPSs remain transitional until July 2028. Below this threshold, smaller clear-cuts may fall outside both compulsory planning and the statutory regeneration requirement. Since May 2025, publicly funded regeneration must use species suited to the site and projected climate. Planting projects of at least 4 ha must generally limit the main species to 80% and include additional species. Outside management documents, certification, specific authorisations or public-funding conditions, privately financed regeneration is not generally required to create a diverse or demonstrably climate-resilient future stand. Regarding TOF Landscape, regeneration does not mean that every tree removed must be individually replanted. Hedges, pollards and coppice features can regenerate from retained stools, roots or natural regrowth, while selective removal of individual trees can be compatible with continued maintenance of the landscape element. Where a hedge is destroyed or relocated, CAP requirements and the national hedge framework can require prior declaration and compensatory replanting. Protected roadside tree alignments are also subject to specific protection and compensation requirements. Relevant institutes and law enforcement ONF assesses harvested sites, specifies regeneration methods and schedules, and monitors implementation in public forests. CNPF evaluates regeneration proposals through PSG approval against the applicable SRGS and advises private owners, but does not systematically inspect each operation. DDT(M) enforces cutting and regeneration obligations, with regional coordination by DRAAF. Forest-health services provide evidence on mortality, pests and climatic damage, supporting decisions on salvage harvesting and subsequent regeneration. Certification bodies audit additional scheme requirements; PEFC requires harvested stands to be renewed towards a future stand within five years, irrespective of ownership size. Regarding TOF Landscape, the Prefecture and DDT(M) administer relevant hedge declarations, authorisations and compensation requirements, while OFB and other competent authorities can intervene where protected species, habitats, water or other environmental rules are affected. CAP controls additionally verify compliance with requirements applying to agricultural hedges.

	Performance in practice and critical reviews Harvested areas are normally regenerated. However, statutory regeneration following clear-cuts exceeding departmental thresholds mainly requires re-establishment of forest cover; it does not generally require a diverse, climate-resilient future stand. Regeneration success is increasingly affected by drought, browsing, fire, pests and unsuitable species selection. CGAAER reports that small private forests are largely neglected and existing support has limited impact. The Cour des comptes found planning documents outdated and climate risks rarely integrated; almost nine million hectares of private forest have no management plan. The Senate reports that only one quarter of private forest has a CNPF-approved plan and recommends basing management requirements on forest sustainability rather than property size. A joint 2023 NGO opinion published by WWF France states that the government had failed to implement its 2020 commitment to integrate operational climate and biodiversity requirements into management documents by 2021. The NGOs criticised the regeneration strategy for encouraging, rather than requiring, diversification and climate resilience. The opinion further criticised the failure to distinguish stands that could be improved through silviculture from those requiring clear-cutting and full replanting, risking unnecessary stand replacement instead of retaining existing forest structure, carbon stocks and resilience. Since 2023, France has reduced the compulsory PSG threshold to 20 ha, and most SRGSs have been revised to address climate change and biodiversity more clearly. These measures partly address the criticism. However, uncertified owners below 20 ha remain outside compulsory planning unless they voluntarily adopt a PSG, RTG or CBPS. No general rule requires privately financed regeneration to produce a diverse, climate-resilient stand. Specified Risk therefore applies to these forests. Harvesting and regeneration methods, species composition, climate suitability, protection measures and the implementation timetable must demonstrate development towards a resilient future stand. Insufficient evidence triggers further investigation or rejection. Regarding TOF Landscape, usual coppicing, pollarding and selective cutting generally retain the roots, structure and regeneration capacity of the feature. Continued national hedge loss nevertheless shows that regeneration and long-term maintenance are not consistently secured. Observed hedge damage or removal beyond normal maintenance triggers further investigation. Where the intervention constitutes hedge destruction, the required declaration or authorisation and compensatory replanting must be demonstrated; otherwise, biomass arising from the operation is non-compliant.
Risk Rating	Specified Risk

Belgium European area	Indicator
2.2.10	Harvested areas shall be regenerated
Supply Base Verifiers	• Legislation and regulations, authorities and law-enforcement • Inventory data, forestry data, general trends • Critical publications and opinions REDII Level A Report Wallonia by BiomassConsult https://energie.wallonie.be/servlet/Repository/REDII-Level-A-Wallonia-BiomassConsult.pdf?ID=78774 Forest Decree Flanders – Legal Protection and Compensation Obligations https://www.natuurenbos.be/beleid-wetgeving/bosdecreet Walloon Forest Code – Amendments Related to Management Plan and Regeneration https://wallex.wallonie.be/eli/decret/2020/04/16/2020022294 Bruxelles Environnement – Forest Management and Environmental Ordinances https://environnement.brussels/thematiques/nature-et-foret/gestion-des-forets Flemish Spatial Planning Codex (VCRO) – Protection of Small Landscape Elements https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1021211 Royal Decree on Nature Conservation and Spatial Planning in Wallonia https://environnement.wallonie.be/legis/dnf/forets.htm National Forestry Accounting Plan of Belgium https://www.cnc-nkc.be/sites/default/files/report/file/national_forestry_accounting_plan_-_belgium_-_18122019_1.pdf Forest Expansion and Quality in Flanders https://www.researchgate.net/publication/316487917_39_Forest_expansion_and_quality_in_Flanders Forest Clearances, Compensatory Afforestation and Biodiversity Offsetting https://www.sciencedirect.com/science/article/pii/S1389934124000728 Nature Restoration Regulation – European Union https://environment.ec.europa.eu/topics/nature-and-biodiversity/nature-restoration-regulation_en Forest Management and Climate Change in the Walloon Region of Belgium https://www.fao.org/4/y5189e/y5189e10.htm
Risk Rating justification	In Belgium, the requirement for regenerating harvested forest areas is governed by regional legislation. In Wallonia, the Forest Code—particularly Article 57 as amended by the decree of 16 April 2020—mandates that all forests owned by legal public persons and larger than 20 hectares must be managed under a formal forest management plan. This obligation came into force on 31 December 2023. These plans include detailed provisions for the regeneration of harvested areas, either through natural regeneration or replanting, with a strong preference for native species and climate-resilient forest compositions. The

	Département de la Nature et des Forêts (DNF) is the competent authority in Wallonia, responsible for overseeing implementation and enforcement. It conducts regular inspections using field visits and satellite monitoring to ensure compliance, and can impose corrective measures in case of failure to regenerate. In Flanders, the Forest Decree requires that public forests and private holdings exceeding five hectares have a forest management plan. These plans must account for regeneration and biodiversity goals, particularly following harvesting. The Agentschap voor Natuur en Bos (ANB) is responsible for approving plans and ensuring compliance. Regeneration is monitored through inspections, and the agency provides support to forest owners, including technical guidance and, in some cases, financial incentives. In Flanders, forests may not be cleared or converted to other land uses, except in exceptional cases where prior authorisation is granted and full compensation is provided. This compensation obligation applies to all types of forest stands, including both large forest blocks and smaller wooded plots. The decree also protects small landscape elements, such as tree rows, hedgerows, and isolated wooded patches. Their removal is subject to the same legal constraints and compensation requirements. In the Brussels-Capital Region, where forested areas are more limited and mainly include the Brussels section of the Sonian Forest, forest policy is managed by Bruxelles Environnement. Although forest legislation is less extensive than in the other regions due to the smaller forest area, regeneration after harvesting is still regulated under the applicable regional nature and environmental ordinances. Bruxelles Environnement ensures that any harvesting in public forests is accompanied by replanting or natural regeneration measures, especially within protected or ecologically valuable zones. Across all three regions, regeneration obligations are reinforced by international sustainability certification schemes such as FSC and PEFC, which require effective regeneration practices. Regional authorities monitor compliance, and enforcement is supported through legal instruments and administrative procedures tailored to forest size, ownership type, and ecological significance. Trees Outside Forests (TOF) – Landscape Feedstock In the case of trees and small stands in landscapes, regeneration is not automatically required under general forest legislation, as these features typically fall outside the formal definition of forest. However, when they qualify as small landscape elements (SLEs), they may be subject to legal protection, particularly in Flanders. The concept of SLEs is defined in Flemish spatial and nature conservation legislation and includes elements such as hedgerows, tree rows, and wooded banks. Their removal is prohibited unless explicitly authorised, and compensation through replanting or equivalent ecological restoration is typically required. Operations affecting SLEs must comply with the relevant decrees (e.g. Forest Decree, Nature Decree, and the Spatial Planning Codex), and may require a permit, especially when located in ecologically valuable areas or spatially protected zones.

	In Wallonia, while the term SLE is not used as a legal category, similar landscape features are often regulated under environmental and spatial planning rules. Trees in open landscapes, along roads, in erosion-sensitive zones, or near watercourses may be protected under local or regional ordinances. Removal of such trees may be prohibited or require a permit depending on their location and function. In many municipalities, prior authorisation is needed before felling isolated trees or small groves, especially where they contribute to ecological connectivity, erosion control, or public amenity. Operations such as pruning, felling, or maintenance of trees in the landscape are also subject to technical rules regarding timing, protection of habitat, and minimisation of soil disturbance. While trees outside forests are generally not subject to formal forest regeneration requirements, legal obligations often apply once these trees serve a spatial, ecological, or protective function. In such cases, removal without authorisation can lead to enforcement actions, and regeneration or compensation is frequently mandated either directly through permits or indirectly through spatial planning conditions. Comment Foronex Foronex inspects and visits most forest plots and nearly all landscape areas. Inspected is if the operator has a permit, and if it should have one. This indicator is low risk, but compliance with laws and regulations is checked as a standard requirement for all plots. See general mitigation procedure (indicator 2.1.3).
Risk Rating	Low Risk

Belgium European area	**Indicator**
2.2.11	The impacts of natural processes such as fires, pests and diseases shall be managed.
Supply Base Verifiers	• Legislation and regulations, authorities and law-enforcement • Government programmes • Statistical and inventory data, trends • Assessment of critical publications and opinions Depicker, A., De Baets, B.and J.M. Baetens, 2020. Wildfire ignition probability in Belgium. Natural Hazards and Earth System Sciences 20: 363-376 pp. https://nhess.copernicus.org/articles/20/363/2020/ Seidl, R. et al. (2011) Unraveling the drivers of intensifying forest disturbance regimes in Europe. Global Change Biology 17: 2842–2852. https://onlinelibrary.wiley.com/doi/full/10.1111/j.1365-2486.2011.02452.x FAO – Deforestation and Land Degradation in Europe https://www.fao.org/3/cb9360en/online/src/html/deforestation-land-degradation.html ReforestAction – Mixed Species Forests Replacing Spruce Monocultures in Belgium

	https://www.reforestaction.com/en/blog/belgium-stand-various-species-has-been-created-out-spruce-monoculture-used-be-gnawed-bark Nieuwe cijfers over de groei van bomen in Vlaanderen https://www.natuurenbos.be/beleid-wetgeving/natuurbeheer/bosinventaris/resultaten#karakteristieken-bosareaal Climate Change Post – Forest Fires in Belgium https://www.climatechangepost.com/belgium/forest-fires/ EFI – Forest Disturbance and Management Trends in Europe https://efi.int/sites/default/files/files/publication-bank/2019/efi_fstp_8_2019.pdf Global Forest Watch – Belgium Fire Dashboard https://www.globalforestwatch.org/dashboards/country/BEL/?category=fires CERAC – Belgium Preparing for More Frequent and Intense Wildfires https://www.cerac.be/en/publications/2025-02-belgium-ready-more-frequent-and-intense-wildfires INBO Indicatoren – Aandeel Beschadigde Bosbomen in Vlaanderen https://www.vlaanderen.be/inbo/indicatoren/aandeel-beschadigde-bosbomen Evolution of the Bark Beetle Crisis in Spruce Forests (Belgium and NE France) https://www.researchgate.net/publication/371997657_Evolution_of_the_bark_beetle_crisis_in_spruce_Picea_abies_forests_A_spatial_and_temporal_remote_sensing_analysis_in_Belgium_and_North-_eastern_France eJustice – Belgian Legislative Portal http://www.ejustice.just.fgov.be/cgi_loi/chang
Risk Rating justification	The three regional forestry acts require that forest owners establish ‘healthy forests’ with a high level of resistance and resilience towards known calamities such as fires, pests, windfall, and flooding. Forest managers are required to apply silvicultural methods that improve the stability of forest stands. Generally, fires, pests and diseases occur at a small scale and can be managed by the forest owner. The most common natural impact on forest stands is storm damage. The forest inventory of Wallonia reports on stem breakage due to windfall. Overall, 5% of the stands are affected among which the damage is rarely widespread. The damaged areas where mostly less than 1 hectare. Normally less than 5% of the stems had snapped (regarding both isolated windthrows and large damaged areas). 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 forest management measures to fight pests, fires and diseases are carried out by each forest owner separately, or though forest groups. Information on these topics are provided online and in forestry journals. One can also hire a consultant. There is a national, country-wide system of fire services, and most forest areas can be reached quickly by road. The prevalence of wildfires in Belgium is limited. The annual burnt area rarely exceeds 40 ha. In 2011, a year with an exceptionally dry spring characterized by 70% less precipitation than usual, around 2360 ha of land was affected by wildfires.

	Belgium, traditionally marked by a low occurrence of wildfires, is becoming increasingly vulnerable due to the escalating impacts of climate change. Rising temperatures and prolonged periods of drought are creating conditions that heighten the risk of more frequent and severe wildfires. In response, the country is actively refining its wildfire management strategies to address this growing threat. As detailed in the report "Is Belgium Ready for More Frequent and Intense Wildfires? Analysis of the Belgian State of Play and Insights from the International Context", published by the Climate Risk Assessment Centre (CERAC) and the National Geographic Institute (NGI), these efforts include enhancing monitoring systems, implementing proactive prevention measures, and reinforcing rapid response capabilities. Recognising the critical importance of protecting its natural resources and key infrastructure, Belgium is undertaking decisive actions to strengthen its resilience against the increasing likelihood of wildfire incidents. It is enhancing wildfire preparedness through AI-based monitoring systems for early detection and a fire warning index in Flanders to improve risk communication and prevention. By law, fire prevention of forests is organised by the Département de la Nature et des Forêts (DNF), Agentschap voor Natuur en Bos (ANB), or Brussels Instituut voor Milieubeheer (BIM). When needed, assessments are made on a daily basis, in cooperation with the Belgian air force. A colour code system to indicate the danger level is used. Colour codes are explained on municipality websites and in the bigger forest/nature areas on special sign-posts. These levels of danger are automatically shared with the fire fighters, who respond to this by going to a higher or lower 'alert' level. When the danger is highest, fire-towers are manned with staff, extra patrols take place and forest owners are warned. If needed, the general public can be informed through the government mobile telephone alarm system BE-Alert. Most forest managers in Belgium are well educated and address the current risks in an adequate way. Due to climate change, however, forests will endure more stress factors and some will decline. A period of drought, for example, increases the chance of stress and decreased health, what increases the chance of pests, what increases the amount of dead timber, what increases the chance of a forest fire, what increases the chance on erosion and landslides. Government policies, legislation and regulations have successfully advocated establishing more resistant and resilient forests. Forests with several tree species, of different ages, and diameter are better adapted to climate change. Current forestry practices favour native tree species best adapted to local conditions. Natural or imitated natural regeneration is considered a method of maintaining genetic diversity, and subsequently reducing vulnerability. The establishment of migration corridors between forest reserves may aid in the autonomous colonization and migration of species in response to climate change. Belgium belongs to a small list of European countries where the annual damage caused by bark beetles in forests, where is expected to increase six times in the period 2021–2030, compared to 1971-2010 (Seidl et al. 2014). Government initiatives will probably prove this projection incorrect, as monocultures of pine and spruce have been decreasing significantly over the

	years. The Seidl et al. (2014) projection of increased bark beetle damage in Belgian forests is largely supported by recent data. The 2017-2022 study, "Evolution of the bark beetle crisis in spruce (Picea abies) forests: A spatial and temporal remote sensing analysis in Belgium and North-eastern France" 1 (De Ligne et al., 2023), reveals a significant 12.2% loss of spruce area, directly attributed to bark beetle outbreaks. This devastation, triggered by the 2018 drought and exacerbated by hot years, demonstrates substantial damage. Regional variations saw the plains experience a catastrophic 50% spruce forest loss.These findings validate the Seidl et al. prediction, highlighting the critical role of climate-driven conditions in escalating bark beetle damage. The federal level and the three Regions have now adopted their own climate change mitigation plans. In addition, the national adaptation plan of Belgium complements the regional plans by identifying specific adaptation measures that need to be taken at a national level in order to strengthen cooperation and develop synergies between the different entities on adaptation. Also some provincial and local governments are developing adaptation plans. See also 2.2.7 for Integrated Pest Management (IPM).
Risk Rating	Low Risk

France European areas	**Indicator**
2.2.11	The impacts of natural processes such as fires, pests and diseases shall be managed.
Supply Base Verifiers	Legislation and regulations Forest Code (Code forestier), forest-fire and sanitary provisions Environmental Code (Code de l'environnement) Law No 2023-580 of 10 July 2023 on prevention and response to wildfire risk Applicable prefectural forest-fire plans and OLD orders Applicable departmental forest-fire protection plans, forest-fire risk-prevention plans and prefectural OLD orders General Code of Local Authorities (Code général des collectivités territoriales), fire and rescue provisions URLs Ministry for Ecological Transition — forest-fire prevention — https://www.ecologie.gouv.fr/politiques-publiques/prevention-feux-foret Ministry of Agriculture — legal vegetation-clearance obligations — https://agriculture.gouv.fr/obligations-legales-de-debroussaillement Ministry of Agriculture — 2023 CGAAER–IGA–IGEDD assessment reporting approximately one-third implementation — https://agriculture.gouv.fr/politique-de-prevention-et-de-lutte-contre-lincendie-de-foret-dans-un-contexte-dextension-et National Assembly — 2024 government response concerning weak implementation and the 2023 reforms — https://questions.assemblee-nationale.fr/q16/16-1482QE.htm

	French Senate — 2026 government response on continuing poor awareness and fire damage in 2025 — https://www.senat.fr/questions/base/2026/qSEQ260207812.html French Senate — 2022 assessment reporting completion rates often below 30% — https://www.senat.fr/rap/r21-856/r21-856_mono.html Var Prefecture — enforcement results recording 1,132 non-conformities from 1,691 controls — https://www.var.gouv.fr/Actions-de-l-Etat/Environnement/Commission-des-polices-de-l-environnement-et-de-la-Mission-inter-services-de-l-eau-et-de-la-nature Pianottoli-Caldarello municipality — continuing non-conformities and formal notices during 2024–2025 — https://www.pianottoli-caldarello.fr/debroussaillement/ Rue89 Bordeaux — regional reporting on poor implementation — https://rue89bordeaux.com/2023/06/debroussailler-ses-proprietes-une-obligation-contre-les-feux-encore-trop-peu-enracinee/ Le Parisien — reporting on the 2023 reinforcement of OLD rules — https://www.leparisien.fr/environnement/feux-de-foret-le-parlement-adopte-le-renforcement-des-regles-de-prevention-29-06-2023-2KGY2F7UTFEXBJBPQHS3EEMCRI.php BDIFF — national forest-fire database — https://bdiff.agriculture.gouv.fr/incendies Prométhée — Mediterranean forest-fire database — https://www.promethee.com
Risk Rating justification	• SBP benchmark: FSC — sufficiently covered; PEFC — sufficiently covered. • Trees Outside Forests: not applicable. • SBE France: Low Risk for public and FSC-certified forests; Specified Risk in defined fire-clearance situations for uncertified private owners and small PEFC group members. Not applicable to TOF. France manages disturbances through forest-health and fire monitoring, prevention planning, surveillance, rapid intervention, sanitary harvesting and regeneration. The Forest and Environmental Codes establish duties for public and private forests, supervised by prefectures, municipalities, ONF and specialised services. However, implementation of mandatory vegetation clearance around dwellings in fire-risk areas remains very inadequate. Policies and laws The Forest Code establishes forest-fire prevention, defence infrastructure, mandatory vegetation-clearance obligations (OLD) and sanitary powers. The Environmental Code, Civil Security framework and prefectural prevention plans provide complementary controls. In designated fire-risk areas, the person legally responsible must clear vegetation around buildings, infrastructure and access routes to prescribed distances. The obligation concerns risk reduction to people and emergency response, not ordinary biomass production. A failure on any land for which the forest owner is responsible is nevertheless relevant to assessing that

	owner's compliance. Relevant institutes and law enforcement The Department of Forest Health (DSF), DRAAF, IGN, ONF, CNPF and research bodies monitor pests, disease and forest decline. BDIFF and Prométhée record fires, while prefectures, DDT(M), municipalities, fire and rescue services and ONF coordinate fire prevention, surveillance and response. For OLD, prefects define departmental zones and technical requirements. Owners are responsible for clearance around their buildings and installations; road authorities, railway managers and electricity-network operators are responsible around their infrastructure. Mayors control compliance, supported by sworn municipal or forest agents, including ONF agents. They may issue formal notices, impose daily penalties and arrange clearance at the responsible party's expense. If a mayor fails to act, the prefect may substitute; the State may impose administrative fines, and criminal enforcement remains possible. Performance in practice and critical reviews Forest-health impacts differ markedly by region and species. Chestnut is affected by ink disease and canker, ash by ash dieback, and spruce by drought-related bark-beetle outbreaks, particularly in north-eastern and eastern France. IGN reported annual tree mortality of approximately 17 million m³ in its 2025 results, 125% above the level recorded a decade earlier. Ungulate browsing continues to obstruct regeneration in affected forests, pine processionary moth distribution is expanding, and repeated drought and heat have worsened crown condition in several important species. Long-term prevention and suppression capacity reduced average annual burned area by approximately 63% between 1973–1990 and 1991–2014. Nevertheless, extreme seasons remain possible: more than 70,000 ha burned during 2022, compared with an annual average of approximately 15,700 ha during 2006–2021. The national prevention strategy combines improved knowledge, forecasting and prevention of ignition; surveillance, detection and rapid initial attack; vegetation, access and infrastructure management; and public information, training and emergency preparedness. Monitoring, early-warning and emergency-response systems are well established, and France undertakes large-scale sanitary and post-disturbance operations. The principal implementation weakness concerns compliance with mandatory vegetation-clearance obligations (OLD), particularly around dwellings. The French Senate's 2022 assessment found completion rates often below 30%. A 2023 interministerial CGAAER–IGA–IGEDD assessment similarly concluded that only approximately one-third of required work was completed.

	The 2023 legislation strengthened mapping, information, controls and sanctions specifically because implementation remained inadequate. Local evidence confirms continuing non-compliance. A Var enforcement report recorded 1,132 non-conforming cases among 1,691 inspections, resulting in 487 penalties. In Pianottoli-Caldarello, renewed mapping continued to identify non-compliant owners in 2024 and led to formal notices in 2025. These local control results are not representative national rates but demonstrate persistent breaches. In 2026, the Government stated that OLD remained insufficiently known. Nearly 190 constructions were severely damaged or destroyed by vegetation fires in 2025, and 90% of the houses destroyed had surrounding land that was not cleared or adequately maintained. No recent national compliance rate was identified; the below-30% figure is therefore a documented historical estimate. Specified Risk therefore applies to uncertified private owners responsible for land subject to mandatory clearance and to small PEFC group members in the same situation. Observed non-clearance (unresolved owner-level fire-prevention breach) renders all biomass from that owner non-compliant.
Risk Rating	Specified Risk

France European areas	**Indicator**
2.2.12	Genetically modified trees shall not be used.
Supply Base Verifiers	Legislation and regulations Environmental Code (Code de l'environnement) Rural and Maritime Fishing Code (Code rural et de la pêche maritime) Directive 2001/18/EC on deliberate release of genetically modified organisms Regulation (EC) No 1829/2003 on genetically modified food and feed Law No 2008-595 of 25 June 2008 concerning genetically modified organisms URLs EUR-Lex — European Union law — https://eur-lex.europa.eu/homepage.html Ministry of Agriculture — GMO situation in France — https://agriculture.gouv.fr/la-situation-des-ogm-en-france European Commission — GMO authorisations — https://food.ec.europa.eu/plants/genetically-modified-organisms/gmo-authorisation_en
Risk Rating justification	• SBP benchmark: FSC — sufficiently covered; PEFC — sufficiently covered. • Trees Outside Forests: not applicable. • SBE France: Low Risk for all ownership and certification categories. Not applicable to TOF. Under the EU authorisation framework, France prohibits commercial GMO

	cultivation; no genetically modified tree is authorised for cultivation. France's last GMO field trial, involving poplars, ended in 2013, and no further field-trial applications have been submitted. No commercial, experimental or unauthorised use of genetically modified trees was found. Policies and laws Directive 2001/18/EC and the Environmental Code require prior authorisation, environmental risk assessment, public information and monitoring for deliberate GMO release. The Rural Code regulates plant material and cultivation, while France maintains a restrictive national policy toward commercial GMO cultivation. An experimental authorisation is not equivalent to commercial use. The historical poplar research trial was time-limited and ended in 2013. No current authorisation permits genetically modified forest trees to be established as a commercial feedstock source. Relevant institutes and law enforcement EU GMO legislation is developed by the European Commission and adopted by the European Parliament and Council. The Ministries of Agriculture and Ecological Transition prepare French implementing legislation. DGAL coordinates enforcement; DRAAF/SRAL conduct field inspections, DGCCRF controls marketed planting material and Customs supports import controls. Applications for experimental release of genetically modified trees are submitted to the Ministry of Agriculture through DGAL. ANSES evaluates environmental and health risks. The Minister of Agriculture decides after public consultation and with the agreement of the Minister for Ecological Transition. Commercial authorisation follows the EU procedure. Performance in practice and critical reviews Neither official registers nor the literature reviewed identify commercial GMO trees in metropolitan France. Conventional breeding, provenance selection and emerging genomic techniques must not be confused automatically with a legally defined genetically modified organism.
Risk Rating	Low Risk

Belgium European area	**Indicator**
2.2.12	Genetically modified trees shall not be used.
Supply Base Verifiers	• Legislation and regulations, authorities and law-enforcement • Development programmes, data, trends • Critical publications and opinions Belgian Biosafety Server – Notification Procedure for Environmental Release of GMOs

	https://www.biosafety.be/content/notification-procedure-submitting-notification-environmental-release-belgium-gmo Belgian Biosafety Server – Field Trials with GM Plants: Database https://www.biosafety.be/content/field-trials-gm-plants-database Biosafety Advisory Council – Homepage https://www.bio-council.be/en Belgian Biosafety Clearing-House – Regulatory Framework https://www.biosafetyprotocol.be/regulatory-framework FPS Health – Summary Notification Information Format (SNIF) https://www.health.belgium.be/sites/default/files/uploads/fields/fpshealth_theme_file/snif.pdf FPS Health – Deliberate Release of GMOs https://www.health.belgium.be/en/node/45590 ILVO – Nieuwe veldproef met genetisch gewijzigde populier https://ilvo.vlaanderen.be/nl/nieuws/nieuwe-veldproef-met-genetisch-gewijzigde-populier Nature Biotechnology – Field Trials of Genetically Modified Trees https://www.nature.com/articles/nbt0609-506 FAO – Field Trial of Genetically Modified Trees in Belgium https://www.fao.org/forestry/download/33497-0d7e09e86891abf0956738a10e8288344.pdf FSC – Genetically Modified Trees: Technical Considerations https://connect.fsc.org/document-centre/documents/resource/397
Risk Rating justification	All use of Genetically modified (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. There is no commercial use of GM trees in Belgium. From 1987 to 2002, Belgium had a growing field trial culture reflecting the country's advanced research in plant biotech. In 1983, researchers in Ghent were the first to develop a genetically engineered plant. The trial in 1987 was one of the first in the world, but after 2002, the number of field trials dropped down to zero as the result of regulatory uncertainty surrounding the implementation of the 2001/18 EU directive on the deliberate release of genetically modified organisms. Laboratory research on plant biotech, however, has always kept up its pace. On May 2009, the Minister of Science and Innovation of Flanders (Belgium) planted a tree. It was the first genetically modified poplar to be planted in an open field trial by the Flanders Institute for Biotechnology, to be followed by the planting of 119 more GM poplars over the next few days on the same site. The project was subjected to public consultation. The Biosafety Council gave a positive advice for the trials. The application was anyway at first refused in May 2008. VIB took legal action at the Council of State (the highest Belgian court) and finally got the authorization in mid-February 2009. The authorization was a landmark in the genetically modified organism field trial history in Belgium. It was the first field trial in Belgium since 2002. The trials

	were approved, under a large number of conditions, by the federal competent Minister of Public Health and the State Secretary for Environment. Flanders Institute for Biotechnology is funded by the Flemish government, but the participation of the Minister in this particular activity was by many seen as a political declaration against government officials who had opposed to this field trial, against organizations such as Nature & Progrès Belgique and Greenpeace Belgium, and also against many people of the general public that had expressed being against the use of the GM trees. Beginning of 2021, the Flanders Institute for Biotechnology submitted a new application for a field trial with genetically modified poplars. The trees have a modified wood composition. The wood has around 20% less lignin and can more easily be converted into sugars. These trials, approved in Januari 2024 running until April 2028, are subject to strict monitoring and safety protocols, as mandated by the Biosafety Council, to mitigate potential environmental or health risks. The research aims to assess the viability of these modified poplars for sustainable biomass utilization, with VIB responsible for comprehensive monitoring and risk management. The researchers of these kind of scientific field trials with GMO trees try to contain the spreading of the genetic material. The trials are for research purposes only. After a few short rotations the trees, including their roots, are destroyed. The biomass from these plots does not end up on the market.
Risk Rating	Low Risk

Belgium European area	**Indicator**
3.1.1	LULUCF emissions shall be accounted for through one of the following routes: Route A Feedstock may be sourced from a country of origin which is party to the Paris Agreement, and which has submitted a Nationally Determined Contribution to the United Nations Framework Convention on Climate Change (UNFCCC) covering carbon emissions and removals from agriculture, forestry and land use which ensure the changes in carbon stock associated with biomass harvest are counted towards the country's commitment to reduce or limit greenhouse gas emissions, or Route B Feedstock may be sourced from a country of origin which is party to the Paris Agreement and has national or sub-national laws in place (developed in accordance with Article 5 of the Paris Agreement and applicable in the area of harvest), to conserve and enhance carbon stocks and sinks, and provided there is evidence that reported LULUCF-sector emissions do not exceed removals, or Route C Feedstock may be sourced from a Supply Base where an assessment demonstrates that both the carbon stock is stable, and the forests' capacity to act as a carbon sink is stable or increasing over the long term.
Supply Base Verifiers	• International conventions ratified • Laws and regulations, authorities, and law enforcement • Internet research into this issue and critical publications SBP RED Level A risk assessment (Article 29.7 – LULUCF) https://sbpcert.wpenginepowered.com/wp-content/uploads/2024/09/SBP-REDII-Level-A-risk-assessment-for-Art-29-7-LULUCF-v1.3_12Sep24.xlsx Belgium's National Energy and Climate Plan (NECP) website

	https://www.nationalenergyclimateplan.be/en European Union NDC update (Revised First NDC – 2023) https://unfccc.int/sites/default/files/NDC/2023-10/ES-2023-10-17%20EU%20submission%20NDC%20update.pdf Paris Agreement signature and declaration by Belgium https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&mtdsg_no=XXVII-7-d&chapter=27&clang=_en Belgium Long-Term Strategy (LTS) – roles and responsibilities summary https://unfccc.int/sites/default/files/resource/LTS_BE_EN_summary.pdf NECP website – includes institutional contributions from federal and regional levels https://www.nationalenergyclimateplan.be/en Belgium. 2024 National Inventory Document (NID 1990–2022) https://unfccc.int/documents/644990 Belgium. 2024 Common Reporting Table (CRT) – including LULUCF sector data https://unfccc.int/documents/644992 Belgium. Biennial Transparency Report 1 (BTR1), CTF-NDC (18.12.2024) https://unfccc.int/documents/644984 Belgium. 2025 Biennial Transparency Report (BTR1) http://unfccc.int/documents/644983 Internet verification (March 2025) found no new developments affecting compliance https://www.nationalenergyclimateplan.be/en UNFCCC-hosted reporting (BTR, NID, CRT) confirms Belgium's alignment with RED and LULUCF targets https://unfccc.int/NDCREG
Risk Rating justification	An independent assessment approved by SBP, confirms that Belgium meets the land use, land-use change, and forestry (LULUCF) requirements outlined in the Renewable Energy Directive (RED), qualifying for compliance under "Route A". Upon signing the Paris Agreement, Belgium declared that its commitment includes the Walloon Region, the Flemish Region, and the Brussels-Capital Region. This assessment remains valid, with no recent developments indicating a change in Belgium's compliance status. Belgium maintains a dedicated National Energy and Climate Plan (NECP) website, providing access to various versions of the plan, results of public consultations, regional inputs, and related recommendations. The updated LULUCF Regulation sets an EU-wide target of 310 million tonnes of CO_2 equivalent in net removals from the LULUCF sector by 2030. Belgium regularly submits information to the European Environment Agency (EEA), including greenhouse gas inventories, approximated inventories for the previous year, updates on policies and measures, emission projections, and progress towards NECP implementation. This reporting supports the EU's ongoing monitoring and allows for corrective action if progress toward 2030 climate and energy targets falls behind. The European Commission assesses draft NECPs, including LULUCF components, and provides recommendations to improve planning and

	implementation. All submitted data are subject to quality checks, and the greenhouse gas inventories reported by Member States, including for the LULUCF sector, will undergo EU-level reviews in 2025, 2027, and 2032. Trees Outside Forests (TOF) – Landscape and Urban Feedstock The results are the same as mentioned above.
Risk Rating	Low Risk

France **European areas**	**Indicator**
3.1.1	LULUCF emissions shall be accounted for through one of the following routes: Route A Feedstock may be sourced from a country of origin which is party to the Paris Agreement, and which has submitted a Nationally Determined Contribution to the United Nations Framework Convention on Climate Change (UNFCCC) covering carbon emissions and removals from agriculture, forestry and land use which ensure the changes in carbon stock associated with biomass harvest are counted towards the country's commitment to reduce or limit greenhouse gas emissions, or Route B Feedstock may be sourced from a country of origin which is party to the Paris Agreement and has national or sub-national laws in place (developed in accordance with Article 5 of the Paris Agreement and applicable in the area of harvest), to conserve and enhance carbon stocks and sinks, and provided there is evidence that reported LULUCF-sector emissions do not exceed removals, or Route C Feedstock may be sourced from a Supply Base where an assessment demonstrates that both the carbon stock is stable, and the forests' capacity to act as a carbon sink is stable or increasing over the long term.
Supply Base Verifiers	Legislation and regulations Paris Agreement Regulation (EU) 2018/841 on LULUCF, as amended by Regulation (EU) 2023/839 Regulation (EU) 2018/1999 on Governance of the Energy Union and Climate Action National Low-Carbon Strategy and integrated National Energy and Climate Plan URLs UNFCCC — annual national inventory submissions, including France — https://unfccc.int/ghg-inventories-annex-i-parties/2026 UNFCCC — France national reports and inventories — https://unfccc.int/documents?f%5B0%5D=country%3A603 European Commission — LULUCF — https://climate.ec.europa.eu/eu-action/land-use-sector_en CITEPA — French greenhouse-gas inventory — https://www.citepa.org/fr/secten/ Ministry for Ecological Transition — National Low-Carbon Strategy — https://www.ecologie.gouv.fr/politiques-publiques/strategie-nationale-bas-carbone-snbc IGN — indicators of sustainable forest management — https://foret.ign.fr/IGD/en/

	EUR-Lex — European Union law — https://eur-lex.europa.eu/homepage.html OFB — ecological, soil, water, carbon and heritage functions of hedges — https://ofb.gouv.fr/que-nous-apportent-les-haies-et-le-bocage Label Bas-Carbone — Ville Arborée method — https://label-bas-carbone.ecologie.gouv.fr/la-methode-ville-arboree
Risk Rating justification	• SBP benchmark: FSC — not covered; PEFC — not covered. • Trees Outside Forests: applicable in both Landscape and Urban categories. • SBE France: Low Risk under Route A for all ownership and certification categories and for TOF Landscape and Urban. Route A. France is a Party to the Paris Agreement and submits NECP reports to the EC. The SBP-commissioned EU RED Level A assessment of Article 29(7) confirms France's compliance. Policies and laws France reports greenhouse-gas emissions and removals under the UNFCCC and Paris Agreement. Regulation (EU) 2018/841, as amended, sets EU LULUCF accounting and national targets; Regulation (EU) 2018/1999 requires integrated planning, reporting and inventories. The French Energy and Climate Strategy, National Low-Carbon Strategy and NECP translate these commitments nationally. Route A is assessed at jurisdictional level and does not require each owner or consignment to prepare a separate LULUCF account. Carbon stock changes from forests and TOF are incorporated into France's national inventory through the official land-use reporting system. For TOF Landscape and Urban, this means that carbon stocks and removals are accounted even where the vegetation is not classified as forest. Agricultural hedges, agroforestry trees and other Landscape TOF are generally included under cropland or grassland, while Urban TOF is included under settlements. IGN and OFB provide additional data on hedge carbon stocks, and the approved Ville Arborée method quantifies sequestration associated with increased urban tree cover. Relevant institutes and law enforcement The Ministry for Ecological Transition coordinates climate policy and UNFCCC reporting. CITEPA prepares the national greenhouse-gas inventory; IGN supplies forest-area and biomass data, with agriculture and land-use authorities contributing other activity data. The European Commission and UNFCCC review submitted inventories and plans. Performance in practice and critical reviews France submits regular national inventories and is covered by the EU compliance framework. The commissioned EU RED Level A review found that the national accounting and legal framework meets Route A. Changes in the strength of the forest sink are material for 3.2.1, but do not mean that LULUCF emissions are unaccounted for.

	The risk is low for all sourcing categories, including Trees Outside Forests Landscape and Urban.
Risk Rating	Low Risk

France European areas	**Indicator**
3.2.1	All feedstock sourcing shall be consistent with either of these two options: Option A. Feedstock may be sourced from Supply Bases where an assessment of the Supply Base shows that the forest carbon stocks are stable or increasing, or Option B. Feedstock may be sourced, if the assessment shows that the forest carbon stocks are declining in the Supply Base, provided that the decline is due to natural processes (fire, pests etc.), and sourcing of feedstock has the aim to recover feedstock that would otherwise be lost or to assist regeneration.
Supply Base Verifiers	Legislation and regulations Forest Code (Code forestier) Regulation (EU) 2018/841 on LULUCF, as amended National Forest Inventory framework National and regional forest programmes and management documents URLs UNFCCC — annual national inventory submissions, including France — https://unfccc.int/ghg-inventories-annex-i-parties/2026 IGN — indicators of sustainable forest management — https://foret.ign.fr/IGD/en/ IGN — forest carbon-stock indicators — https://foret.ign.fr/IGD/en/indicateurs/1.4 FAO — Global Forest Resources Assessment — https://www.fao.org/forest-resources-assessment/en/ IGN — health of French forests — https://www.ign.fr/reperes/bilan-de-sante-des-forets-francaises Ministry of Agriculture — Forest Health Department — https://agriculture.gouv.fr/le-departement-de-la-sante-des-forets-role-et-missions CITEPA — LULUCF inventory — https://www.citepa.org/fr/secten/
Risk Rating justification	• SBP benchmark: FSC — not covered; PEFC — not covered. • Trees Outside Forests: not applicable. • SBE France: Low Risk for all ownership and certification categories. Not applicable to TOF. Route A. FAO estimates living-biomass carbon rose from 1.377 GtC in 2020 to 1.421 GtC in 2025. IGN reports 1.35 GtC in living trees in 2024, 21% above 2009; density rose from 73 to 82 tC/ha. Bourgogne-Franche-Comté, in eastern France, was the only administrative region with a significant decline, about 5% since 2015, because of drought and bark-beetle outbreaks in coniferous forests. Policies and laws

	The accounting framework is described under 3.1.1. This indicator examines the underlying forest-stock condition rather than whether emissions are reported. National Forest Inventory data provide area, growing stock, increment, mortality and removals; management and regeneration requirements under 2.2.9–2.2.11 provide the operational context for explaining declines. France has used several carbon-related forest-policy instruments. DEFI provides tax incentives for forest investment and management, while CIFA supports savings for prevention and post-disturbance reconstitution. Other measures include storm-insurance support, agroforestry assistance and the historical PAIFB programme. The former PNFB sought greater timber mobilisation, while earlier SNBC scenarios combined increasing harvests with substitution of fossil-intensive materials and greater storage in long-lived wood products. These instruments and scenarios pursue different objectives and do not by themselves demonstrate positive carbon effects for every harvesting operation. Route A is met when stocks are stable or increasing across the Supply Base. Where a defined regional stock declines, Route B requires evidence that natural processes caused the decline and that feedstock recovery uses otherwise lost wood or supports regeneration. Planned conversion or harvesting that independently drives the decline would not qualify. Relevant institutes and law enforcement IGN provides rolling national and regional inventory estimates. FAO consolidates national reporting in the Global Forest Resources Assessment. CITEPA uses forest data for LULUCF accounting, while ONF, CNPF and the Forest Health Department provide management and disturbance evidence. Performance in practice and critical reviews National area, volume and carbon stocks have increased over the relevant period. The forest sink has weakened because mortality and reduced growth have risen, but a weaker annual sink is not the same as declining total carbon stock. Resampling of 102 RENECOFOR plots after approximately fifteen years found average soil-carbon accumulation of 0.35 tonnes of carbon per hectare per year between 1993 and 2012. The increase was statistically significant in the forest floor and upper 10 cm of mineral soil; no significant change was detected in the measured 10–20 cm and 20–40 cm layers. The result therefore demonstrates surface accumulation rather than a confirmed increase throughout the soil profile. The regional decline in Bourgogne–Franche-Comté does not alter the national Route A conclusion. Temporary removals above increment reflect a regional drought- and bark-beetle-driven conifer mortality, particularly in spruce, followed by salvage harvesting. National forest carbon stocks in

	France, however, remain increasing.
Risk Rating	Low Risk

Belgium European area	**Indicator**
3.2.1	All feedstock sourcing shall be consistent with either of these two options: Option A. Feedstock may be sourced from Supply Bases where an assessment of the Supply Base shows that the forest carbon stocks are stable or increasing, or Option B. Feedstock may be sourced, if the assessment shows that the forest carbon stocks are declining in the Supply Base, provided that the decline is due to natural processes (fire, pests etc.), and sourcing of feedstock has the aim to recover feedstock that would otherwise be lost or to assist regeneration.
Supply Base Verifiers	• International conventions ratified • Laws and regulations, authorities, and law enforcement • Internet research into this issue and critical opinions Belgium. National Inventory Document (NID 1990–2022), submitted December 2024 https://unfccc.int/documents/644990 Belgium. First Biennial Transparency Report (BTR1), submitted February 2025 https://unfccc.int/documents/644983 Belgian Integrated National Energy and Climate Plan (NECP) 2021–2030 https://www.cnc-nkc.be/sites/default/files/report/file/national_forestry_accounting_plan_-_belgium_-_18122019_1.pdf FAO. Évaluation des ressources forestières mondiales (FRA) 2020 – Belgique https://openknowledge.fao.org/server/api/core/bitstreams/12b68d70-351c-45ae-a331-c2a0d3938fcc/content PanoraBois Wallonia – Overview of the forest-wood sector (OEWB, 2021) https://www.filiereboiswallonie.be/sites/default/files/media-documents/OEWB-PanoraBois_2021_0.pdf INBO – Research Institute for Nature and Forest (Flanders) https://www.vlaanderen.be/inbo/en-gb/homepage/ ResearchGate – Spatial distribution of belowground organic carbon in Belgian forests (2000) https://www.researchgate.net/figure/Spatial-distribution-of-BOC-stock-kg-C-m-2-in-Belgian-forests-in-the-year-2000-The_fig1_43326882 Frontiers in Forests and Global Change (2024) – Biomass carbon stock change modelling for Belgium https://www.frontiersin.org/journals/forests-and-global-change/articles/10.3389/ffgc.2024.1236203 Organic carbon stocks and changes in forest biomass in Belgium (inventory-based approach) https://cdr.eionet.europa.eu/be/eu/mmr/lulucf/envykvycq/KP-LULUCF-529-BEL-2022-2020.xlsx/manage_document

	Global Forest Watch – Forest carbon flux and deforestation tracking https://www.globalforestwatch.org/ FAOstat – Belgium forest carbon stock data (living biomass and land use) https://www.fao.org/faostat/en
Risk Rating justification	Belgium meets the requirements of Option A: feedstock sourcing occurs in a Supply Base where forest carbon stocks are stable or increasing. Available data, inventories, and reports confirm that in general forest carbon stocks in Belgium are stable or increasing. Where regional harvesting exceeds growth (in Wallonia), this is a temporary result of forest maturation rather than a long-term issue. In Belgium, forestry laws and regulations are enforced at the regional level. In Wallonia, the Department of Nature and Forests (DNF) oversees compliance with sustainable forestry practices and biomass management. In Flanders, this responsibility falls to the Agency for Nature and Forests (ANB). In the Brussels-Capital Region, the Brussels Environment administration is in charge. Forest activities are governed by the regional Forest Codes and environmental laws, which promote sustainable forest management, biodiversity conservation, and the monitoring of forest carbon stocks. Flanders and Wallonia regularly conduct forest inventories and monitor biomass and carbon stock dynamics. Although the Brussels-Capital Region is highly urbanised and contributes less to national forest carbon sequestration, it supports urban forestry and green infrastructure for carbon storage and air quality. FAOstat data show that carbon storage in Belgium's living forest biomass increased from 66.7 million tonnes in 2008 to 71.8 million tonnes in 2020 — a 7.6% increase, despite only a 0.25% increase in forest area. Since 2016, Belgium's forests have maintained a positive net annual CO_2 balance. FAO's Global Forest Resources Assessment 2020 (Belgique) also highlights rising carbon stocks per hectare across all forest carbon pools (above ground, below ground, deadwood, humus, and soil) between 1990 and 2015. According to the First Biennial Transparency Report under the Paris Agreement (18 Dec. 2024) and Belgium's National Inventory Document (NID 1990-2022), forests are a consistent national carbon sink. The land-use change matrix for the LULUCF sector is compiled by the three regions using GIS data, forest inventories, and region-specific sources such as soil organic carbon. Between 1990 and 2022, forest land emitted an average of -2000 Gg CO_2-eq annually, making forests Belgium's largest carbon sink category. In Flanders, long-term monitoring shows an upward trend in carbon sequestration, suggesting that conservation-oriented management contributes positively to carbon storage. Walloon forests also show changes in organic carbon stocks over time, though their net sequestration is lower than in Flanders. Global Forest Watch data confirm a national net sink: from 2001 to 2023, Belgium's forests emitted 2.73 Mt CO_2e annually and captured 5.69 Mt CO_2e, resulting in an average net sink of -2.95 Mt CO_2e per year. Belgium stores an estimated 57.8 million tonnes of carbon in forest biomass. Forest carbon density varies: broadleaf forests store an average of 10.0 kg

	C/m², coniferous forests 9.5 kg C/m², and mixed forests 8.7 kg C/m². Flanders has reported annual losses of soil organic carbon in mineral soils (20 to 381 ha/year between 1990 and 2022), partly due to the lower baseline carbon content of forest soils compared to wetlands. However, more land has been converted from forests to wetlands (30 to 571 ha/year) than vice versa, contributing positively to national land carbon dynamics. N_2O emissions from these land-use changes are also accounted for. Unlike countries such as the Netherlands, Belgium has nearly no forests on drained peatland, meaning it avoids the chronic CO_2 emissions associated with such drained soils.
Risk Rating	Low Risk

Belgium European area	**Indicator**
3.2.2	Primary feedstock shall not be sourced from forest areas where site productivity is low and, according to local definitions or norms, the areas are classified as low-productive or difficult to regenerate.
Supply Base Verifiers	• International conventions ratified • Laws and regulations, authorities, and law enforcement • Internet research into this issue and critical opinions Ramsar Site Information Sheet – Zwin Nature Reserve https://rsis.ramsar.org/ris/1407 Ramsar Country Profile – Belgium https://www.ramsar.org/country-profile/belgium Forest Europe – Official Country Profiles on Forests and Forestry https://foresteurope.org/wp-content/uploads/2017/08/Country-profiles-on-forests-and-forestry.pdf Forest Europe – Ministerial Conference on the Protection of Forests in Europe https://foresteurope.org Convention on Biological Diversity – Belgium 6th National Report https://www.cbd.int/doc/world/be/be-nr-pa-en.pdf Walloon Legislation Portal – Nature and Forests https://environnement.wallonie.be/home/legislation/nature-et-forets.html Flemish Spatial and Environmental Codex https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1003183¶m=informatie Federal Belgian Legal Database http://www.ejustice.just.fgov.be
Risk Rating justification	In Belgium, wetlands and low-productive forest areas are usually designated as nature protection areas, where conservation is the primary function and timber production is absent or strictly limited. These include peat bogs, marshes, wet heaths, and alluvial forests — habitats of high ecological value. While specific terms such as “low-productive” or “difficult to regenerate” are not be officially used in regional classifications, the management practices

	and legal frameworks reflect understanding of the ecological importance of these habitats. Consequently, many of these areas are protected under regional legislation and international frameworks. Belgium is a signatory to the Ramsar Convention (9 sites), and several sites are designated as wetlands of international importance, such as the Zwin (Flanders), Hautes Fagnes (Wallonia), and the Valley of the Haute-Sûre. Additionally, some of the areas are included in the Natura 2000 network, which protects threatened habitats and species. Nature reserves are widespread, particularly in areas with high water levels, poor soils, or exceptional biodiversity. Well-known examples include the Kalmthoutse Heide, Hageven-De Plateaux, and the Hohes Venn. Management in these reserves prioritises ecological restoration, including rewetting, invasive species control, and promoting natural forest dynamics. Deadwood is typically retained, and natural regeneration is encouraged to enhance biodiversity and carbon storage. These areas are managed by regional authorities, conservation agencies, and NGOs such as Natuurpunt in Flanders and Natagora in Wallonia. Private landowners may also participate, often with financial support for conservation measures. Forest Europe (formerly known as the Ministerial Conference on the Protection of Forests in Europe (MCPFE), is a pan-European policy process promoting sustainable forest management across 46 countries and the EU. Its MCPFE classification system, used by Belgium for forest reporting, includes: - Class 1: Strict biodiversity protection, no harvesting; - Class 2: Conservation with limited harvesting; - Class 3: Protection functions (e.g. water, soil), with restricted use. In Belgium, approximately 7.7% of forests are designated for biodiversity conservation under MCPFE Classes 1 and 2, which typically involve minimal or no harvesting activities. Additionally, nearly 24% of Belgian forests are designated as having protection functions under MCPFE Class 3, which may also have restrictions on harvesting to maintain their protective roles. These figures indicate that a significant portion of Belgium's forest area is under some form of protection with limited harvesting. Regarding usual forest areas, in Flanders, the Forest Decree (Bosdecreet) applies. It allows for differentiated management, including non-intervention zones or natural regeneration, especially in ecologically sensitive parts. Enforcement lies with the Agency for Nature and Forests (Agentschap voor Natuur en Bos). In Wallonia, the Code forestier governs forest use. At difficult sites, adapted silvicultural practices are recommended, with oversight by the Département de la Nature et des Forêts (DNF).
Risk Rating	Specified Risk

France **European areas**	**Indicator**

3.2.2	Primary feedstock shall not be sourced from forest areas where site productivity is low and, according to local definitions or norms, the areas are classified as low-productive or difficult to regenerate.
Supply Base Verifiers	Legislation and regulations Forest Code (Code forestier), particularly Articles L.141-1–L.143-2 and R.141-1–R.143-9 on protection forests and mountain-land restoration Environmental Code (Code de l'environnement), including requirements concerning wetlands, protected habitats, protected species and Natura 2000 assessments Directive 92/43/EEC on the conservation of natural habitats and wild fauna and flora Directive (EU) 2018/2001, as amended by Directive (EU) 2023/2413 Fourth National Wetlands Plan 2022–2026 National Forest-Soils Action Plan, 2025 URLs Géoportail — national mapping and aerial imagery — https://www.geoportail.gouv.fr EUR-Lex — Renewable Energy Directive — https://eur-lex.europa.eu/eli/dir/2018/2001/2024-07-16 European Commission — RED biomass sustainability — https://energy.ec.europa.eu/topics/renewable-energy/bioenergy/biomass_en Légifrance — protection forests and mountain-land restoration — https://www.legifrance.gouv.fr/codes/section_lc/LEGITEXT000025244092/LEGISCTA000026127603/ Ministry for Ecological Transition — National Forest-Soils Action Plan, 2025 — https://www.ecologie.gouv.fr/sites/default/files/documents/25017_plan_sols_forestiers.pdf Ministry for Ecological Transition — protection and restoration of wetlands — https://www.ecologie.gouv.fr/politiques-publiques/protection-milieux-humides Ministry for Ecological Transition — wetlands — https://www.ecologie.gouv.fr/politiques-publiques/milieux-humides ONF — RTM responsibilities, protection forests and mountain risks — https://www.onf.fr/vivre-la-foret/enjeux-foret/restauration-terrains-montagne/+/2318::restauration-des-terrains-en-montagne-une-mission-historique-de-lonf.html ONF — Restauration des terrains en montagne — https://www.onf.fr/aux-cotes-des-territoires/+/1a7::restauration-des-terrains-en-montagne.html Observatoire des forêts françaises — forest area and its development — https://observatoire.foret.gouv.fr/themes/presentation-des-forets-de-l-hexagone-et-de-la-corse Observatoire des forêts françaises — legally classified protection forests — https://observatoire.foret.gouv.fr/indicateurs-gestion-durable/5-1-forets-de-protection INPN — protected areas, habitats and species data — https://inpn.mnhn.fr IGN — historical aerial photographs and land-cover evidence —

	https://remonterletemps.ign.fr Ministry of Agriculture / CGEDD–CGAAER — assessment of RTM implementation and renewal of protection stands — https://agriculture.gouv.fr/telecharger/78825 Journal of Alpine Research — wood-energy development and mobilisation of timber on difficult Alpine slopes — https://journals.openedition.org/rga/1587 ONF — Saint-Gervais-les-Bains forest-management plan and mobilisation of previously inaccessible mountain timber — https://www.onf.fr/++amgt++A030918D/++zfiles++51e4c660 ONF — Péone forest-management plan and regeneration difficulties — https://www.onf.fr/++amgt++A037899Q/++zfiles++510e6d6b Écrins National Park — slow-growing high-mountain forests and risks from heavy harvesting — https://www.ecrins-parcnational.fr/dossier/biodiversite-forestiere-meilleur-atout-economique
Risk Rating justification	• SBP benchmark: FSC — not covered; PEFC — not covered. • Trees Outside Forests: not applicable. • SBE France: Specified Risk for every ownership and forest-certification category. Not applicable to TOF. France has no single national category covering all low-productive or difficult-to-regenerate forest areas. Examples include steep mountain slopes, high Alpine forests and woody encroachment on wetlands or peatlands. Publications report underfunded RTM (Restauration des Terrains en Montagne) renewal, regeneration difficulties and perceived harvesting pressure in the Alps. Specified Risk applies to all owners. This indicator is intended to prevent commercial biomass sourcing from forests where low productivity and difficult regeneration make harvesting incompatible with the continued functioning of the forest. Relevant examples include vulnerable high-mountain forests, forests on thin or unstable soils and forest established on peatlands or other wet sites. For example, in northern Canada, the indicator covers extensive forest-tundra and low-productivity boreal woodlands, where climatic conditions mean that recovery after harvesting can take many centuries. France has a more complex situation than countries where forest area has remained broadly stable. French forest area has increased by approximately 9% since 2007, partly through agricultural and pastoral abandonment and natural woody succession. Consequently, substantial areas classified as forest today were not forest in January 2008. France contains extensive Alpine, Pyrenean and Mediterranean mountain areas. At high altitude, low temperatures, short growing seasons, shallow or unstable soils, steep slopes, erosion, drought, browsing and natural hazards can make regeneration slow or uncertain. Many such forests perform essential protection functions against avalanches, rockfall, erosion and torrential flooding. Some are covered by RTM, protection-forest or protected-

	area regimes, but these classifications do not provide an exhaustive map of every low-productive or difficult-to-regenerate forest. In this SBE, the “shall not be sourced” requirement in indicator 3.2.2 is interpreted as applying to biomass-driven exploitation of low-productive or difficult-to-regenerate forest areas. Material arising from operations specifically intended and properly implemented to conserve or restore the vulnerable ecosystem may be accepted, provided their purpose and effects are demonstrated. Conversion of peatland to a production forest or commercial harvesting in high-Alpine forests would be rejected. Conversely, biomass arising from an operation undertaken solely to conserve or restore a wetland or peatland may be accepted where the land-cover type, conservation purpose and impacts are demonstrated. Indicator 3.2.2 is closely related to the EU RED sustainability requirements, but it is not replaced by them. Similar questions are assessed through the EU RED Level B risk mitigation procedures. The Level B assessment examines historical and present land status, including whether an area was forest, wetland, peatland or highly biodiverse grassland in January 2008 and subsequently lost that status. For areas affected by forest expansion or woody encroachment after January 2008, historical evidence is used to establish the land status at that date. Where the area was a wetland, peatland or highly biodiverse grassland, the EU RED Level B assessment determine whether woody development converted the former ecosystem. Biomass is rejected where conversion occurred. Conversely, removing encroaching woody vegetation may be acceptable where the operation is specifically intended and properly implemented to conserve or restore the vulnerable ecosystem. This conditional approach does not apply to unconditional EU RED No-Go categories, including primary and old-growth forests: no biomass from these areas is eligible, even if it arises from a maintenance operation. The SBE and EU RED assessments are complementary, and where both apply, the stricter conclusion prevails. Supplier information, public databases and maps, and the evidence assessed under 2.1.1–2.1.3 are reviewed. In case of doubt the biomass stays non-compliant. Policies and laws The Forest Code allows forests to be classified as forêts de protection where their conservation is necessary to maintain soils on mountains and slopes or protect against avalanches, erosion, flooding and sand movement. Classification prohibits land use that could compromise forest conservation. Harvesting must comply with an approved management document or exploitation regulation. In private protection forests without such a document, the prefect approves the exploitation regulation and may prescribe harvesting methods, retention of specified stands and forest-reconstitution work.

	Unscheduled harvesting requires specific prefectural authorisation. The Forest Code also establishes the framework for conservation and restoration of mountain terrain. Through the RTM system, protective forests and engineering structures are managed to limit avalanches, erosion, rockfall, landslides and torrential flooding. Management interventions may be necessary to retain the protective function, but this does not make such forests ordinary biomass-production areas. The Environmental Code and water legislation regulate operations affecting wetlands, peatlands, watercourses, protected habitats and protected species. Natura 2000 plans and projects likely to affect designated habitats or species require an assessment of compatibility with conservation objectives. The National Wetlands Plan prioritises protection, restoration and hydrological recovery rather than productive forest management. ONF management documents, SRGSs, PSGs and other sustainable-management documents may identify site productivity, regeneration constraints and protection functions. However, recently wooded areas and small private properties may lack detailed stand-level classification. Moreover, the relevant legal categories overlap with, but do not completely reproduce, the SBP definition. Relevant institutes and law enforcement The Ministry of Agriculture develops national forest policy. Prefects, DRAAF and DDT(M) administer protection-forest classifications, harvesting authorisations, forest-management requirements and mountain-risk provisions. They may impose harvesting and regeneration conditions or reject operations that would compromise protective functions. ONF manages public forests and operates the RTM service. RTM manages approximately 250,000 ha of state-owned mountain protection forest and around 23,000 protective structures. It assesses natural hazards, programmes protective works and manages forests whose stabilising function can take precedence over timber production. CNPF and its regional centres assess PSGs against the applicable SRGS and advise private owners on site suitability, regeneration and mountain-forest management. However, not every small private property has an approved management document or systematic stand-level inspection. DREAL, OFB, water-police services and Natura 2000 and protected-area managers identify and control impacts on wetlands, peatlands, protected habitats and species. Publicly available information includes datasets and maps published by IGN and INPN, Géoportail and historical aerial imagery, regional wetland inventories, and local site or vegetation maps. Performance in practice and critical reviews

	Much French primary feedstock originates from established production forests with normal productive capacity. Nevertheless, the evidence does not support a general Low Risk conclusion for all forest categories. France's considerable post-2007 forest expansion creates an identification problem. Current forest status does not show whether a stand developed on abandoned pasture, highly biodiverse grassland, wetland, peatland or another vulnerable open ecosystem. The risk is relevant in the Alps and other mountain regions. Regional forest frameworks identify forest types where regeneration is slow or difficult because of cold, competing vegetation, shallow soils, drought, browsing or unstable terrain. Mountain-forest studies also report efforts to mobilise additional wood, including wood energy, from steep and previously underused slopes. RTM management and the legal protection-forest regime provide important safeguards, particularly in state-owned and managed public forests, but they do not cover every forest with a protective function. ONF currently manages approximately 250,000 ha of state-owned RTM forests in eleven Alpine and Pyrenean departments, while only about 163,000 ha of French forest has the formal legal status of forêt de protection. These categories overlap and neither constitutes a complete inventory of forests regulating avalanches, rockfall, erosion or water flows. France's 2025 forest-soils plan states that one quarter of French forests is situated on slopes exceeding 25% and is particularly sensitive to erosion. It also acknowledges that significant erosion occurs in sloping public and private forests outside the historic RTM system. A protective function therefore does not automatically result in RTM management, legal classification or strengthened control of harvesting. The principal national RTM review identified serious weaknesses in renewing ageing protection stands. Budget shortages allowed silvicultural interventions to be postponed repeatedly, creating the risk that ageing stands would become increasingly difficult to manage. The national RTM service lacked precise information on the protection effectiveness of 31,302 ha of state-owned RTM forest in high-risk sectors and estimated that completing the necessary management-plan revisions would take approximately twenty years. Renewal of protection stands represented only 1% of the works programmed for 2012–2016. By the end of 2014, only 40% of the five-year RTM programme had been implemented, compared with the theoretical 60%, because new emergencies displaced planned work and expenditure remained below identified needs. The review consequently recommended reserving a specific share of RTM funding for silvicultural work in high-priority protection forests. Current ONF information describes 105 RTM specialists, 23,000 protection structures and €15 million of annual State funding, but does not establish that the documented forest-renewal backlog has been eliminated.

	More recent evidence confirms that harvesting safeguards remain difficult to implement. The 2025 national forest-soils plan states directly that applying existing good-practice guidance remains technically and economically difficult. It reports that 80% of machinery-induced soil compaction occurs during the first three passes and that recovery remains slow and incomplete after more than fifteen years. Ground-based harvesting systems circulate over at least 20% of a parcel, compared with 3–5% for cable extraction. However, France still lacks a dedicated cable-logging qualification and faces recurring recruitment difficulties. The plan also reports that one third of forest soils is highly sensitive to calcium and magnesium removal, 45% to potassium removal and 35% to phosphorus removal. Clear-cutting, whole-tree harvesting and the removal of branches and other small biomass therefore create particular risks on steep, wet, shallow or nutrient-poor soils. Pressure to mobilise previously inaccessible mountain timber is documented. Research on the French Alps found that 62% of the Rhône-Alpes forest area was considered difficult or very difficult to exploit and that two thirds of the additional biomass identified for wood-energy development was located on slopes. The 2018–2037 management plan for the municipal forest of Saint-Gervais-les-Bains illustrates this pressure: new access infrastructure could make more than 200 ha harvestable, while conditional cuts on 219 ha then considered inaccessible accounted for 27,210 m³—almost 90% of the volume proposed for harvesting during the planning period. This is not evidence that the planned cuts are non-compliant, but it demonstrates that remoteness and poor profitability do not provide lasting protection once roads, cable extraction and public subsidies make harvesting economically possible. Regeneration is also not automatic in managed mountain forests. In the municipal forest of Péone, an ONF assessment found insufficient larch regeneration and too few saplings following earlier harvesting. Browsing, the difficulty of regenerating larch and climate change were identified as the principal threats. The revised plan responded by restricting harvesting to stands with sufficient growing stock, extending rotations and leaving other compartments at rest. The Écrins National Park similarly reports that barely half of its high-mountain forest is suitable for timber production, that cold conditions result in very slow growth, and that pressure for heavy cuts followed by planting remains present despite the resulting loss of biodiversity and resilience. These findings do not establish that harvesting is generally unsustainable in French mountain forests. They demonstrate incomplete protection coverage, delayed renewal of protection stands, continuing operational limitations, regeneration difficulties and active efforts to make previously inaccessible forests harvestable. Biomass from low-productive or difficult-to-regenerate plots requires a site-specific assessment of productivity, regeneration capacity, soil vulnerability, protective functions, harvesting method and land-management purpose.
Risk Rating	Specified Risk

France European areas	Indicator
3.2.3	feedstock shall not be sourced from forest areas in the Supply Base which, according to local definitions or norms, are classified as having combined attributes of high carbon stocks and high conservation value (HCV).
Supply Base Verifiers	Legislation and regulations Directive (EU) 2018/2001 on renewable energy, as amended by Directive (EU) 2023/2413 Council Directive 92/43/EEC on the conservation of natural habitats and wild fauna and flora, particularly Annex I and Articles 6 and 17 Directive 2009/147/EC on the conservation of wild birds Environmental Code (Code de l'environnement) Forest Code (Code forestier) National Biodiversity Strategy 2030 Applicable national-park charters Protected-area and biological-reserve instruments URLs EUR-Lex — Habitats Directive 92/43/EEC — https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:01992L0043-20130701 EUR-Lex — Birds Directive 2009/147/EC — https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:02009L0147-20190626 European Commission — guidelines for identifying, mapping and strictly protecting primary and old-growth forests — https://environment.ec.europa.eu/publications/guidelines-defining-mapping-monitoring-and-strictly-protecting-eu-primary-and-old-growth-forests_en Ministry for Ecological Transition — Natura 2000 network and assessment of activities — https://www.ecologie.gouv.fr/politiques-publiques/reseau-europeen-natura-2000 Ministry for Ecological Transition — protected areas in France — https://www.ecologie.gouv.fr/politiques-publiques/aires-protegees-france Ministry for Ecological Transition — National Biodiversity Strategy 2030 — https://www.ecologie.gouv.fr/sites/default/files/documents/SNB_2030-Document%20chapeau.DEF_.pdf ONF — integral and directed biological reserves — https://www.onf.fr/vivre-la-foret/+/a3a::les-reserves-biologiques-des-espaces-proteges-dexception.html INPN — habitats, species, Natura 2000 and protected-area data — https://inpn.mnhn.fr/accueil/recherche-de-donnees/reglementation IGN — potential subnatural-forest mapping — https://geoservices.ign.fr/actualites/2025-06-forets-subnaturelles IGN — historical État-major maps and aerial photographs — https://remonterletemps.ign.fr/actualites/cartes-anciennes IGN — sustainable-forest-management indicators —

	https://foret.ign.fr/IGD/en/ CNPF — private-forest management documents — https://www.cnpf.fr/gestion-durable-des-forets/gestion-durable/les-documents-de-gestion-durable-des-forets-privees-psg OFB — environmental-law enforcement — https://ofb.gouv.fr/police-de-environnement PatriNat — France's 2019–2024 Habitats Directive reporting — https://www.patrinat.fr/fr/actualites/rapportage-europeen-2019-2024-une-evaluation-nationale-mobilisant-plus-de-400-experts OFB — conservation status of forest habitats of Community interest — https://ofb.gouv.fr/chiffres-cles European Commission — EU seventh national report to the Convention on Biological Diversity, 2026 — https://environment.ec.europa.eu/document/download/c5a15594-3513-441c-978d-e5bc4bc26b53_en?filename=SWD_2026_66_1_EN_document_travail_service_part1_FINAL.pdf UICN France — French forests in crisis, including protection gaps in nature reserves — https://uicn.fr/wp-content/uploads/2020/05/rapport_forts_en_crise.pdf WWF France — threatened old-forest fragments in the Pyrenees — https://www.wwf.fr/sites/default/files/doc-2022-02/202202_Lettre_Forets_Vivantes_n11.pdf CSRPN Grand Est — Opinion 2023-144 on old-growth-forest identification and mapping — https://www.grand-est.developpement-durable.gouv.fr/IMG/pdf/avis2023-144_vieilles-forets.pdf VertigO — forest-management practices in French Natura 2000 sites — https://journals.openedition.org/vertigo/46771 Canopée — satellite assessment of clear-cuts — https://www.canopee.ong/publications/observatoire-des-coupes-rases/ Canopée — critical review of forest certification — https://www.canopee.ong/faq/les-idees-recues-sur-la-foret/les-certifications-forestieres-garantissent-elles-une-gestion-durable-de-la-foret/ Cerema — protection of roadside avenues and tree alignments — https://outil2amenagement.cerema.fr/outils/la-protection-des-allees-et-alignements-darbres-bordant-les-voies-ouvertes-la-circulation Cerema — Espaces boisés classés covering parks, individual trees, hedges and alignments — https://outil2amenagement.cerema.fr/outils/lespace-boise-classe-ebc Service-Public — protected-species derogations and habitat controls — https://entreprendre.service-public.fr/vosdroits/F38791 Ministry for Ecological Transition — Trame verte et bleue — https://www.ecologie.gouv.fr/politiques-publiques/trame-verte-bleue
Risk Rating justification	• SBP benchmark: FSC — partially covered; PEFC — not covered. • Trees Outside Forests: applicable in both Landscape and Urban categories. • SBE France: Specified Risk for every ownership and certification category and for TOF Landscape and Urban; EU RED Level B controls prevail where applicable.

	Biodiversity values and HCVs are identified and assessed under indicators 2.1.1–2.1.3; carbon stocks are addressed under indicator 3.2.1. Habitats listed in Annex I to the EU Habitats Directive (92/43/EEC), and their key elements, provide evidence of HCVs. Old native trees, protected species, valuable habitats and natural forest structures also indicate that further assessment is needed. Biomass from primary and old-growth forests (OGF) is excluded under EU RED requirements, even where harvesting is legal, certified or undertaken for sanitary, safety or conservation purposes. An unconditional EU RED No-Go conclusion always prevails. For other forests combining high carbon stocks and HCVs, management must conserve both values. This SBE excludes harvesting that structurally reduces carbon stocks over the medium term or degrades HCVs. Limited maintenance or conservation operations may be compliant where management plans and their implementation maintain carbon stocks over that timescale and demonstrably contribute to conserving biodiversity values and HCVs. Many OGF are protected in France, but others occur outside designated areas in both public and private forests. Protected-area rules and certification can permit management operations in OGF. Permission to carry out such work does not make the resulting biomass eligible under EU RED. France has no classification corresponding to forests combining "high carbon stocks and HCVs". However, other relevant French classifications, including “ancient forests” (forêts anciennes), do trigger further investigation. Any indication that a forest combines high carbon stocks and HCVs triggers further SBE assessment. The same conservation requirements apply to relevant wooded features in the TOF Landscape and Urban categories. Policies and laws The Environmental Code implements the EU Habitats and Birds Directives and establishes national parks, nature reserves, biotope and natural-habitat protection orders, Natura 2000 sites and protected-species requirements. These instruments can prohibit damaging operations or require assessment and authorisation. However, Natura 2000 designation, inclusion in a national or regional park, or identification as a ZNIEFF does not itself prohibit timber harvesting. Operations may remain possible where they comply with the applicable conservation objectives and site rules. Strictly protected areas provide stronger assurance. Timber exploitation is prohibited in integral biological reserves and integral national-park reserves. Directed biological reserves and most other protected areas may permit management interventions, including harvesting for habitat management, safety or forest renewal. Protected-area status must therefore be checked against the rules applying to the particular site and cannot automatically be

	treated as either an exclusion or proof of compliance. The Forest Code requires sustainable and multifunctional forest management and provides for management documents in public forests and qualifying private forests. ONF management plans, PSGs, SRGSs, RTGs and CBPSs can include biodiversity safeguards, habitat trees, deadwood retention and ageing or senescence islands. They do not, however, establish a general prohibition on harvesting in primary or old-growth forests, nor do they guarantee conservation of every high-carbon forest containing HCVs. Approval of a management document therefore demonstrates regulated management, but does not by itself demonstrate compliance with indicator 3.2.3. Regarding TOF Landscape and Urban, the same conservation principle applies to individual trees and woody landscape features combining high carbon stocks with HCV. Relevant examples include veteran pollards, ancient hedgerow trees, old avenues, riparian trees and mature park trees supporting protected species, cavities, exceptional habitats or important ecological connectivity. Individual trees may be pruned or occasionally removed for safety, maintenance or conservation purposes where the relevant carbon and HCV functions of the wider feature are maintained. Destructive removal or biomass harvesting that reduces these combined values is non-compliant. France has no complete national inventory of all forests, individual trees and TOF features combining high carbon stocks with HCV. FSC requirements partially address HCV identification and management, while PEFC provides related biodiversity safeguards, but neither certification system alone demonstrates compliance with the full requirement of this indicator. The National Biodiversity Strategy 2030 provides for further identification and strong protection of subnatural forests. This is a future protection objective and confirms that potentially important forests remain outside strict protection. Consequently, outside unconditional EU RED No-Go areas, any indication of combined high carbon stock and HCV triggers SBE assessment to determine whether the values are conserved and whether the proposed intervention is compatible with this indicator. Relevant institutes and law enforcement The Ministry responsible for ecological transition develops biodiversity, protected-area and Natura 2000 policy and leads the national action plan for old wood and subnatural forests. The ministry responsible for forests develops the Forest Code framework and national forest policy. At EU level, the European Commission oversees implementation of the Habitats Directive and the EU RED sustainability and No-Go requirements. MNHN and PatriNat manage habitat, species and protected-area information through INPN. IGN provides national forest-inventory data, historical land-cover information and information on stand age, volume and carbon stocks,

	and contributes to mapping potential subnatural forests. These datasets support screening but do not constitute a complete national map of forests combining high carbon stocks and HCV. ONF identifies biodiversity values and applies management and reserve rules in state and other public forests. CNPF assesses private-forest management documents against the applicable SRGS but does not inspect every stand or harvesting operation. DREAL, DDT(M), prefects, Natura 2000 authorities and protected-area managers assess operations subject to conservation rules and authorisations. OFB environmental inspectors enforce protected-species, habitat and protected-area legislation. Performance in practice and critical reviews France has protected important examples through integral reserves, biological reserves, national-park core areas and UNESCO-listed beech forests. The biological-reserve network has continued to expand. However, only integral reserves provide a general exclusion of commercial forestry; other designations allow interventions according to their management objectives. Identification remains incomplete. Regional inventories have located old and highly natural forests, especially in the Pyrenees and parts of eastern and central France, but methods and coverage differ. Potential subnatural-forest maps still require field confirmation, while small and fragmented stands are easily missed. In its 2026 assessment of EU Biodiversity Strategy implementation, the European Commission reports that gaps in EU-wide mapping of primary and old-growth forests prevent assessment of whether all such forests will be strictly protected by 2030. The protection gap has practical consequences. A French UICN review reported that timber harvesting occurred in 60% of the forest area within nature reserves and that less than 10% of those reserve forests had strict protection. These figures predate recent additions to the protected-area network, but demonstrate why “protected area” cannot be equated with “No-Go”. WWF has reported that identified old-forest fragments in the Pyrenees remain threatened by timber exploitation. The CSRPN Grand Est reported in 2023 that no regional inventory or assessment of old-growth forests meeting the European Commission definition existed for Grand Est, despite the region containing 1.9 million hectares of forest. It called for immediate inventory and mapping rather than waiting for national programmes. A peer-reviewed Natura 2000 study records clear-cutting within French Natura 2000 sites and explains that designation leaves substantial scope for forestry interventions, including harvesting for wood energy. Canopée’s satellite assessment documents clear-cuts within mapped ancient forests, Natura 2000 sites and regional natural parks. A separate Canopée review of

	forest certification reports that PEFC permits derogations from its clear-cut size guidance and sets no clear-cut area limit for monospecific plantations where cutting is included in a management document. France's 2019–2024 reporting under Article 17 of the EU Habitats Directive, coordinated by PatriNat and summarised by the OFB, classified only 20% of assessments of forest habitats of Community interest as favourable. Conservation status covers habitat range and area, structure and ecological functions, pressures, threats and future prospects. The result documents widespread unfavourable conditions, but does not attribute them solely to forest management. Climate-related mortality and forest-renewal programmes can also create pressure because mature stands can be felled and replaced in the name of sanitation and/or forest climate-adaptation, even where retaining old trees, deadwood and natural stand structures are important for biodiversity and carbon storage. These findings do not demonstrate systematic harvesting of recognised primary forests. They indicate that France lacks complete mapping and an enforceable nationwide prohibition covering every forest with combined high-carbon and HCV attributes. This also applies to the TOF category. France has introduced and implemented an important approach to "ancient forests" (forêts anciennes), not equally established in other countries, recognising their continuity of land use and their value as natural and historical heritage. Ancient forests generally have continuous forest cover since at least the mid-nineteenth century, identified using historical État-major maps. Ancientness concerns continuity of land use, not current maturity: an ancient forest can contain young, intensively managed stands, while a mature forest can have developed on formerly open land. An ancient forest is therefore an important screening category, but is not automatically an old-growth forest or an unconditional EU RED No-Go area. France has inventories and protected areas for ancient forests and policies for old-growth and subnatural forests, but these measures do not meet this indicator in full. Protected areas and certified forests can, for example, allow maintenance operations in Old Growth Forests; they are not necessarily classified as no-harvest zones.
Risk Rating	Specified Risk

Belgium European area	**Indicator**
3.2.3	feedstock shall not be sourced from forest areas in the Supply Base which, according to local definitions or norms, are classified as having combined attributes of high carbon stocks and high conservation value (HCV).

Supply Base Verifiers	• International conventions ratified • Laws and regulations, authorities, and law enforcement • Internet research into this issue and critical opinions EUNIS Habitat Type: European Dry Heaths (4030) https://eunis.eea.europa.eu/habitats/10185 EUNIS Habitat Type: Northern Atlantic Wet Heaths with Erica tetralix (4010) https://eunis.eea.europa.eu/habitats/10187 Natura 2000 Vlaanderen – Habitat Types Overview https://natura2000.vlaanderen.be/habitattypes?categorie=162 Geopunt Vlaanderen – Public Geospatial Portal http://www.geopunt.be/ Geoportail Wallonie – Regional Spatial Data Infrastructure https://geoportail.wallonie.be/home.html See also indicators 2.1.1, 2.1.2, 2.1.3 , 2.2.1, 3.2.1, 3.3.1 and 4.2.3
Risk Rating justification	For carbon stocks criteria, see Indicators: 2.2.1, 3.2.1 and 3.3.1. For HCV criteria, see Indicators: 1.1, 1.2, 1.3 and 4.2.3 Forest areas with attributes of both high carbon stocks and high conservation value — such as old-growth forests — are typically designated as protected areas where harvesting is absent or strictly limited. Examples include core zones of ancient woodland in the Sonian Forest, part of which lies in Brussels and is listed as a UNESCO World Heritage Site for its undisturbed beech forest. Brussels also protects other old woodlands, such as Dieleghem Wood and Laerbeek Wood, under strict conservation regimes managed by Brussels Environment (Leefmilieu Brussel). These forests are part of the Natura 2000 network. Belgium has 312 Natura 2000 areas, covering around 13% of the national territory, including many forest habitats of high ecological value. Forestry operations in these zones must comply with conservation objectives defined in site-specific management plans. In Flanders, protected forests are managed by the Agentschap voor Natuur en Bos; in Wallonia, by the Département de la Nature et des Forêts (DNF). NGOs such as Natuurpunt and Natagora also manage high conservation value forests, often under approved nature management plans. Outside protected areas, sustainable forestry is mandated by law. The Forest Decree (Bosdecreet) and Nature Decree in Flanders, the Code forestier and Code de l'environnement in Wallonia, and specific ordinances in the Brussels-Capital Region apply. If remnants of old-growth or high conservation value forest are encountered they are subject to stricter measures. Strictly interpreted, this indicator prohibits all sourcing from forest areas with both high carbon stocks and high conservation value (HCV), such as old-growth or near-natural forests. In Belgium, these areas are often subject to strong legal protection and are not managed for timber production. Where management does occur, it is typically conservation-oriented and regulated through site-specific objectives that prioritise ecological integrity. The Belgian legislative and regulatory frameworks—supported by inventories, mapping, and monitoring—are designed to prevent practices that would lead to significant carbon stock depletion, net greenhouse gas emissions, or the

	loss of conservation values. Protected areas, Natura 2000 sites, and zones with formal nature designations offer an additional safeguards. Interventions in such areas typically involve low-impact maintenance measures, such as the removal of invasive species. These generate biomass, without compromising long-term carbon storage or biodiversity objectives. However, there could still be remnants of high carbon stock and high conservation value forests outside protected zones, or cases where exceptions apply. As such, verifying compliance with this indicator remains important.
Risk Rating	Specified Risk

Belgium European area	**Indicator**
3.3.1	Feedstock sourcing shall be in compliance with the principles of cascading use, high quality stem wood shall not be used as feedstock if it is in substantial demand for long-lived products in the Supply Base.
Supply Base Verifiers	• Government regulation of the market. • Legislation on traded products. • Alternative markets and sales opportunities. • Internet research into the issue in practise. • Interviews with stakeholders on the market. Fern - Will Flemish Government's Move to Withdraw Biomass Subsidies Set an Example? https://www.fern.org/publications-insight/belgium-will-flemish-governments-move-to-withdraw-biomass-subsidies-set-an-example-255/ IEA Bioenergy Country Report 2024 – Belgium https://www.ieabioenergy.com/wp-content/uploads/2024/12/CountryReport2024_Belgium_final.pdf European Commission – Sustainable Wood for a Sustainable World https://op.europa.eu/en/publication-detail/-/publication/9b823034-ebad-11e8-b690-01aa75ed71a1 IEA Bioenergy Task 40 – Cascading Use of Biomass 2016 https://task40.ieabioenergy.com/wp-content/uploads/sites/6/2013/09/t40-cascading-2016.pdf WWF – Cascading Use of Wood Products Report https://www.wwf.eu/?263091/Cascading-use-of-wood-products-report OVAM – Circulair Materialenverhaal: Vlaamse Consumptievoetafdruk https://ovam.vlaanderen.be/nl/w/circulair-materialenverhaal-hoe-de-vlaamse-consumptievoetafdruk-verlagen-?ssa OVAM – Action Plan on Food Loss and Biomass (2021–2025) https://ovam.vlaanderen.be/documents/177281/0/Actieplan+voedselverlies+en+biomassa+2021-2025+EN_.pdf
Risk Rating justification	The cascading principle advocates prioritizing material uses of wood before energy applications to maximize resource efficiency and environmental benefits.

	The European Union (EU) has recognized challenges and is working to promote the cascading use of wood. Reports by organizations like the World Wide Fund for Nature (WWF) highlight the need for efficient wood utilization to meet projected demand and reduce pressure on forests. These reports call for regulatory frameworks that prioritize value-adding non-fuel uses of wood. The European Panel Federation (EPF) has commended EU legislation that encourages cascading use and restricts subsidies for burning industrial-grade roundwood. The International Energy Agency (IEA) is an intergovernmental organisation that provides data, analysis, and policy recommendations on global energy issues, including bioenergy through its IEA Bioenergy programme. The IEA also promotes the cascading use of biomass as a preferred approach, which can be considered non-binding policy advice for national authorities. The report “Implementation of bioenergy in Belgium – 2024 update” states that Flanders is doing research into the cascading principles in which non-energy applications are favoured. However, even if Flanders would solve this issue, demand for certified biomass comes from several European countries. In Belgium and neighbouring countries, the timber and paper industries are well-established, creating substantial demand for high-quality stem wood for valuable products. However, subsidies for biomass can disrupt the usual hierarchy, potentially diverting wood away from traditional industries. Besides, the price for energy in general has increased significantly due to sanctions on fossil fuels (and wood) from Russia and Belarus. In Belgium, renewable energy policies are primarily managed at the regional level. The three regions (Flanders, Wallonia, and the Brussels- Region) have implemented various measures, including investment subsidies and green certificates, to support renewable energy projects. Additionally, the federal government provides tax incentives. Despite these efforts, concerns persist about market distortions due to biomass subsidies. Today, the government addresses this by consulting with industry federations like Fedustria and Cobelpa to ensure that timber suitable for material applications isn't redirected to energy production. Consequently, green energy certificates are not issued for timber flows that serve as raw materials for these industries.
Risk Rating	Specified Risk

France European areas	**Indicator**
3.3.1	Feedstock sourcing shall be in compliance with the principles of cascading use, high quality stem wood shall not be used as feedstock if it is in substantial demand for long-lived products in the Supply Base.
Supply Base Verifiers	Legislation and regulations Directive (EU) 2018/2001 on renewable energy, as amended by Directive (EU) 2023/2413, particularly Article 3(3) on the cascading use of biomass and restrictions on financial support for specified industrially usable roundwood Directive (EU) 2018/2001, as amended by Directive (EU) 2023/2413

	National Forest and Wood Programme and national bioeconomy policy Applicable biomass support-scheme conditions French Energy Code (Code de l'énergie) National Forest and Wood Programme 2016–2026 (Programme national de la forêt et du bois—PNFB) Multiannual Energy Programme (Programmation pluriannuelle de l'énergie—PPE) National Biomass Mobilisation Strategy (Stratégie nationale de mobilisation de la biomasse—SNMB) ADEME Heat Fund and BCIAT funding conditions applicable to publicly supported biomass-heat projects URLs EUR-Lex — Renewable Energy Directive: biomass-cascading principle and restrictions on direct financial support for sawlogs, veneer logs and industrial-grade roundwood — https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:02018L2001-20240716 Légifrance — French Energy Code — https://www.legifrance.gouv.fr/codes/id/LEGITEXT000023983208/ Ministry for Ecological Transition — bioenergy sustainability requirements and implementation of the Renewable Energy Directive — https://www.ecologie.gouv.fr/politiques-publiques/durabilite-bioenergies French Senate — legislative procedure for transposition of Directive (EU) 2023/2413 — https://www.senat.fr/dossier-legislatif/pjl25-118.html Ministry of Agriculture — National Forest and Wood Programme 2016–2026 — https://agriculture.gouv.fr/le-programme-national-de-la-foret-et-du-bois-2016-2026 Ministry for Ecological Transition — Multiannual Energy Programme — https://www.ecologie.gouv.fr/politiques-publiques/programmations-pluriannuelles-lenergie-ppe Ministry for Ecological Transition — biomass energy and the National Biomass Mobilisation Strategy — https://www.ecologie.gouv.fr/politiques-publiques/biomasse-energie ADEME — BCIAT 2026 requirements for publicly supported industrial, agricultural and tertiary-sector biomass heat — https://agirpourlatransition.ademe.fr/entreprises/aides-financieres/catalogue/aap/bciat-2026-biomasse-chaleur-pour-lindustrie-lagriculture-et-le-tertiaire ADEME — GIS Biomasse, national biomass data and support for regional biomass review groups — https://www.ademe.fr/presse/communique-national/ressources-et-usages-de-la-biomasse-un-equilibre-au-coeur-de-la-transition-ecologique/ Agreste — annual statistics on commercial timber harvesting and sawmilling — https://agreste.agriculture.gouv.fr/agreste-web/disaron/EXFNR00/detail/ French Senate — 2025 review of wood-quality categories, competing uses, prices and public financial support — https://www.senat.fr/rap/r24-847/r24-84716.html

	French Senate — 2025 assessment of regional biomass review groups, advisory opinions and incomplete interregional-flow data — https://www.senat.fr/rap/r24-847/r24-84717.html France Stratégie — economic, material and energy uses of the French forest–wood resource — https://www.strategie-plan.gouv.fr/files/files/Publications/Rapport/2023-07-20-na_124-filiere_foret-bois.pdf I4CE — competition between energy and material uses of wood and the effects of public support — https://www.i4ce.org/wp-content/uploads/2023/10/231107-i4ce3794-BUBE-VFr_web_vf.pdf France Bois Forêt — forest–wood sector and market information — https://franceboisforet.fr Fédération nationale du bois (FNB) — sawmilling and timber-industry information — https://www.fnbois.com
Risk Rating justification	• SBP benchmark: FSC — partially covered; PEFC — partially covered. • Trees Outside Forests: not applicable. • SBE France: Specified Risk for every ownership and forest-certification category. Not applicable to TOF. The Biomass Producer must actively exclude primary stemwood for which there is substantial demand for long-lived products. In France, cascading is promoted through policy but is not obligatory by law. A 2025 French Senate Economic Affairs Committee report found that subsidised wood-energy demand can distort prices and compete with other uses, drawing primary wood from processors without equivalent public support. Article 3(3)–(3d) of the amended Renewable Energy Directive establishes the following cascading order: wood-based products, extension of product life, reuse, recycling, bioenergy and disposal. Member States must design biomass-energy support schemes to avoid distorting competition with material users and may not directly subsidise energy production from sawlogs, veneer logs, industrial-grade roundwood, stumps or roots. Derogations are possible for energy security or where local industry cannot technically or quantitatively use the material for a higher-value purpose. For forest biomass, this concerns necessary pre-commercial thinning or wildfire-prevention work, documented salvage logging and wood whose characteristics make it unsuitable for local processing. These derogations must be justified geographically and reported to the European Commission. The EU requirement primarily regulates Member-State policy and public support; indicator 3.3.1 applies directly to feedstock sourcing. The EU definition of industrial-grade roundwood considers species, dimensions, straightness and knot density and excludes wood demonstrably unsuitable for industrial use under relevant forest and market conditions. Policies and laws France's PNFB, PPE, SNBC and biomass strategy promote material and

	long-lived uses before energy recovery. However, the Court of Appeal of Marseille recorded on 26 June 2026 that France had not yet transposed RED III. The transposition bill adopted by the Senate in February 2026 remained before the National Assembly in August 2026. Meanwhile, eligible wood-energy operators can continue applying RED II under the French transitional clause until 31 December 2026. ADEME's 2026 Biomass Heat for Industry, Agriculture and Tertiary Sector programme (BCIAT) provides public funding for large biomass-heat projects producing more than 12 GWh annually. Applicants must assess lower-carbon alternatives and provide information on supply quality, traceability and diversified supply plans. The programme also limits the volume of forest chips eligible for support. These funding requirements do not regulate unsupported commercial transactions or prohibit energy users from purchasing industrially usable stemwood. Their existence underlines the absence of a general allocation mechanism and confirms the relevance of indicator 3.3.1. Relevant institutes and law enforcement The Directorate-General for Energy and Climate (DGEC) develops bioenergy legislation and support policy. The Directorate-General for Economic and Environmental Performance of Enterprises (DGPE) develops forest policy, while the Directorate-General for Enterprise (DGE) represents industrial and material-use interests. ADEME administers the Heat Fund and BCIAT support programmes. Each region has an inter-agency biomass review group (cellule biomasse régionale), bringing together ADEME and the regional State services DRAAF, DREAL and DREETS. It assesses supply plans for major biomass-energy projects, examines resource availability and potential competition with material uses, and submits an advisory opinion to the regional prefect. No authority systematically grades timber consignments or prevents industrially usable wood from being sold outside publicly supported schemes for energy production. The legal basis and FSC or PEFC certification do not establish whether a particular assortment is in substantial demand for long-lived products or whether those material users are competing with subsidised biomass-energy buyers for the same wood. Performance in practice and critical reviews France has established markets for sawlogs, veneer, poles, pallets, panels, pulp, construction products and other material uses. The Senate describes sawlog quality broadly as wood above approximately 20–25 cm in diameter, industrial wood as approximately 7–8 to 20–25 cm, and energy wood as smallwood, tops and harvesting residues. Diameter alone is insufficient: species, length, straightness, knots, decay, damage and processor specifications determine whether a stem has a higher-value outlet. Agreste records commercial harvesting and processing volumes. The GIS

	Biomasse—formed by ADEME, FranceAgriMer, IGN and INRAE—consolidates national data on biomass resources and uses and supports regional biomass review groups. These datasets describe national and regional flows but do not establish demand for an individual assortment. Sawmills, veneer, panel and pulp producers and other processors provide the relevant specifications, purchasing information and available processing capacity. No national dataset or regional review system traces individual assortments from harvest to competing material and energy buyers. France Stratégie reported that 68% of the 57 million m³ harvested in 2021 ultimately entered energy use, including household firewood and processing residues, while 21% entered long-lived products. Commercial wood-energy volumes doubled over the preceding decade, whereas commercial sawlog and industrial-wood volumes declined. I4CE found that French energy users can outbid panel manufacturers for primary wood. It concluded that France's strong support for wood energy, including energy from primary resources, reduces the availability of low-diameter and lower-quality wood for long-lived products. The 2025 Senate review confirms that competition has expanded beyond occasional overlaps. During the 2022–2023 energy-price crisis, wood was sometimes purchased for energy at higher prices than for industrial processing. The review reports that approximately €800 million of €1.2 billion awarded through relevant project calls since 2020 supported biomass heat, compared with slightly over €300 million for construction and material uses. It also identifies pellet plants and large biomass projects creating local pressure on resources. The Senate further found that the advisory opinions of regional biomass review groups are not always followed and that their assessment of interregional flows remains dependent on incomplete data and professional declarations. Existing project review therefore does not provide complete oversight of competition for wood resources across regions. Conversely, the presence of a processor does not by itself demonstrate substantial demand. Processing capacity can be insufficient for particular species, dimensions or salvage wood; and markets can temporarily become saturated. Salvage wood can contain both industrially usable and unusable assortments; describing the entire volume as salvage wood does not establish its quality. Actual demand varies by assortment, location and time and must be established using evidence from economically accessible markets.
Risk Rating	Specified Risk

Belgium **European area**	**Indicator**

4.1.1	Freedom of association and the right to collective bargaining shall be respected in the workplace.
Supply Base Verifiers	• Laws and regulations, authorities and law enforcement • Internet research into the issue in practise • Standard employment contracts and interviews with employees International Labour Organization (ILO) – Main Website http://www.ilo.org ILO Normlex – Belgium: Ratified Conventions and Legal Status https://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102560 ILO – Report on Migrant Workers' Rights and Protections in Belgium https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@ed_protect/@protrav/@migrant/documents/publication/wcms_883446.pdf World Bank – Worldwide Governance Indicators https://www.worldbank.org/en/publication/worldwide-governance-indicators ITUC – 2024 Global Rights Index https://www.ituc-csi.org/IMG/pdf/2024_ituc_global_rights_index_en.pdf?31226/ce28bb2139c2fe0d4e5f0a36d726ac7334d1c2d9be8b29dd88b4d2b9d89f5654 U.S. Department of State – 2023 Human Rights Report: Belgium https://www.state.gov/reports/2023-country-reports-on-human-rights-practices/belgium/ ETUC – Bodson and Others v. Belgium (Trade Union Conviction Judgment) https://etuclex.etuc.org/sites/default/files/2025-01/judgment_bodson_and_others_v._belgium_-_case_involving_trade-union_members_convicted_of_maliciously_obstructing_road_traffic_0.pdf Belgian Labour Law – Law of 4 August 1996 on Well-being of Workers https://werk.belgie.be/nl/wet-van-4-augustus-1996-betreffende-het-welzijn-van-de-werknemers-bij-de-uitvoering-van-hun-werk Belgian Labour Law – Law of 5 December 1968 on Collective Labour Agreements https://werk.belgie.be/sites/default/files/content/documents/Paritaire%20comit%C3%A9s%20en%20CAO's/Regelgeving/Wet%2005121968.pdf Belgian Labour Law – Law of 17 March 1987 on Annual Holidays https://www.ejustice.just.fgov.be/eli/wet/1987/03/17/1987012264/justel Belgian Labour Law – Law of 16 March 1971 on Work Regulation https://www.ejustice.just.fgov.be/eli/wet/1971/03/16/1971031602/justel MyCodex – Belgian Legal Viewer: Work Legislation https://www.mycodex.be/viewer.php?id=142453 Belgian Collective Labour Agreements – Overview of Parity Committees and CAOs https://werk.belgie.be/nl/themas/paritaire-comites-en-collectieve-arbeidsovereenkomsten-caos/collectieve-4
Risk Rating justification	Belgium has ratified all eight fundamental ILO conventions. The status on the ILO website for all eight conventions is 'in force'. The Belgian legislation on labour rights is conform to the European and international requirements.

	There is federal legislation in place that prescribes what requirements employers have to fulfil. Applicable legislation for the area under assessment covers the key principles recognized in the ILO Fundamental Principles and Rights at work (which are recognized as: freedom of association and right to collective bargaining; elimination of forced and compulsory labour; eliminations of discrimination in respect of employment and occupation; and effective abolition of child labour). The key legislative framework on most work related issues are on a federal level, for all Belgium sometimes the enforcement is on a regional level. The main collective bargaining regulations include: - The Belgian Constitution (Article 27): Guarantees the right to form associations, including trade unions. - The Act of 5 December 1968 on Collective Labour Agreements and Joint Committees: Governs collective bargaining at the sectoral level. - The Employment Contracts Act of 3 July 1978: Establishes rules concerning employment relations, including the right to union representation. Organizations and ministries responsible for the legal basis are responsible for Belgium on a Federal level: Federal Public Service Employment, Labour and Social Dialogue: Responsible for developing and implementing labour laws and policies, including those related to freedom of association and collective bargaining. National Labour Council (Conseil National du Travail / Nationale Arbeidsraad): A bipartite institution where employers' organizations and trade unions negotiate national collective agreements and advise the government on labour matters. Organisations responsibility for law enforcement for Belgium on a federal level: Federal Public Service Employment, Labour and Social Dialogue: Oversees the enforcement of labour laws, including those pertaining to freedom of association and collective bargaining. Labor Inspectorate: Ensures compliance with labour legislation by conducting inspections and addressing violations. For companies with more than 50 employees, the law provides workers the right to form and join independent unions of their choice without previous authorization or excessive requirements and to conduct legal strikes and bargain collectively. Workers in smaller companies are able to choose representatives to affiliate with a union, but do not enjoy the same level of protection. The law prohibits antiunion discrimination and provides for reinstatement of workers fired for union activity. Workers exercised these rights. Citizen and non-citizen workers enjoyed the same rights. Work council elections are mandatory in enterprises with more than 100 employees, and safety and health committee elections are mandatory in companies with more than 50 employees. The ‘paritaire’ committees (PCs) are sectoral bodies set up with employer and employees on the basis of the Law of 5 December 1968 on collective

	agreements and joint committees. One of their assignment is concluding CAOs. Every four years, a call for candidate representative organizations for each ‘paritaire’ committee (PC) and subcommittee is published in the Belgian Official Gazette. The most recent social elections in Belgium were held between 13 and 26 May 2024. These sectoral agreements for collective labour agreements are established with the social partners of PC125 (wood industry), PC200 (clerical workers) and PC146 (forestry). No relevant violations were found of the laws or rights of free association and collective bargaining in relation to the forestry sector. According to Human Rights Report of the USA Department of state (2022), Belgium continues to uphold its strong legal framework supporting freedom of association and the right to collective bargaining. Workers are generally able to form and join independent unions, conduct legal strikes, and engage in collective bargaining without significant hindrance. However, the report notes that employers sometimes resort to legal actions to prevent strikes, and courts have occasionally issued pre-emptive prohibitions against such actions. Additionally, while antiunion discrimination is prohibited by law, there have been instances where employers dismissed union representatives, opting to pay statutory severance instead of reinstatement. This practice has raised concerns among labour organizations regarding the effective protection of union activities. In late 2023, a draft bill introduced by the Belgian Minister of Justice sought to restrict certain individuals convicted of specific offenses from participating in peaceful protests. Union leaders criticized this proposal, arguing that it threatened freedom of opinion and could undermine legitimate union activities. Thierry Bodson, President of the General Labour Federation of Belgium (FGTB-ABVV), expressed concerns that the bill posed a "danger to the right to freedom of opinion" and was potentially more detrimental to Belgian workers than "an attack on automatic wage indexation." In practise, there are some violations of rights as reported in the IUTC 2024 report: the criminalisation of strikes and the stigmatisation of strikers in Belgium. According to the IUTC report Belgium has prosecutions of union leaders: on 7 January 2020, the Court of Cassation of Belgium upheld the conviction of Bruno Verlaeckt, president of the Antwerp branch of the Algemene Centrale (industry branch of ABVV-FGTB), for malignant obstruction of traffic during a general strike. While no individual act could be proven, the Court held Verlaeckt responsible solely for his role in organising the strike. No penalty was imposed. On 15 January 2025, the European Court of Human Rights ruled in the case of Bodson and Others v. Belgium, addressing the criminal conviction of union members for blocking a motorway during a strike. The Court examined whether the conviction infringed upon the applicants' right to freedom of association and collective bargaining. While the individuals were penalized for their participation in the strike action, no specific unlawful acts could be attributed to them personally. The ruling emphasized the delicate balance between maintaining public order and protecting workers' rights, setting an important precedent for labor disputes in Belgium. The ILO Report on Migrant Workers' Rights to Freedom of Association and

	Collective Bargaining (2023) highlights challenges faced by migrant workers globally, including Belgium. It emphasizes that while Belgium has robust labor laws, migrant workers often encounter barriers such as language difficulties, cultural differences, and limited access to union representation. Belgium maintains strong legal frameworks protecting freedom of association and collective bargaining, yet regional challenges persist. Wallonia has experienced more high-profile cases of union leader prosecutions, while Flanders faces similar legal ambiguities regarding strike actions. Belgium maintains a high governance score according to the World Bank Governance Index and continues to rank low in corruption levels. The country upholds strong institutional frameworks, ensuring transparency and accountability in labour rights enforcement. Comment Foronex Although the risk of compulsory labour in the forestry and wood sector in Belgium is considered low, Foronex remains vigilant and attentive to any suspicious labour-related situations within its supply chain. Our Corporate Social Responsibility Policy requires that human rights, national laws, international standards, and ethical norms are respected throughout the entire supply chain. With regard to the right to strike, we acknowledge that certain aspects of Belgian legislation and its enforcement could be improved. For example, Foronex does not support the dismissal of employees solely for their involvement in the organisation of strikes. Our company rejects all forms of discrimination, both within our company and across our supply chain. Foronex employs individuals from many countries, who work together as a team.
Risk Rating	Low Risk

France **European areas**	**Indicator**
4.1.1	Freedom of association and the right to collective bargaining shall be respected in the workplace.
Supply Base Verifiers	Legislation and regulations Constitution of 4 October 1958 and Preamble to the Constitution of 1946 Labour Code (Code du travail) Social Security Code (Code de la sécurité sociale) Rural and Maritime Fishing Code (Code rural et de la pêche maritime) Penal Code (Code pénal) National Collective Agreement for Agricultural, Rural and Forestry Works and Services Companies ILO Conventions Nos 87 and 98 URLs Ministry of Labour — labour law and inspection — https://travail-emploi.gouv.fr

	ILO NORMLEX — ratifications for France — https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102632 DREETS — regional labour authorities — https://dreets.gouv.fr MSA — occupational health and safety — https://ssa.msa.fr Défenseur des droits — https://www.defenseurdesdroits.fr ITUC — Global Rights Index — https://www.globalrightsindex.org Légifrance — collective agreement for landscape companies, IDCC 7018 — https://www.legifrance.gouv.fr/conv_coll/id/KALICONT000005635325
Risk Rating justification	• SBP benchmark: FSC — sufficiently covered; PEFC — sufficiently covered. • Trees Outside Forests: applicable in both Landscape and Urban categories. • SBE France: Low Risk for all ownership and certification categories and for TOF Landscape and Urban. French law protects freedom of association and collective bargaining and is generally enforced. Occasional anti-union discrimination is reported, particularly in small companies, but no relevant violations were identified in the forestry sector. Indicators 4.1.1–4.1.10 form one connected labour-rights section. The Labour Code governs employment, worker representation, bargaining, wages, working time, equality, training, grievances and health and safety. The Social Security Code and Rural and Maritime Fishing Code establish MSA coverage for agricultural and forestry workers. The Penal Code addresses trafficking, forced labour, discrimination and serious endangerment. France has ratified the fundamental ILO conventions relevant to these indicators. The framework described below provides the common basis for the assessment of Labour Rights and Working Conditions. The following indicators refer back to this shared framework and address the specific requirements and practical evidence relevant to each individual aspect. Policies and laws France has ratified ILO Conventions No. 87 on freedom of association, No. 98 on the right to organise and collective bargaining, No. 135 on workers' representatives and No. 141 on rural workers' organisations. The Constitution's 1946 Preamble recognises the right to organise, defend interests through trade-union action and bargain collectively. The Labour Code prohibits discrimination because of union membership or activity, protects union representatives and establishes enterprise representation through the Social and Economic Committee (CSE). Collective agreements can set terms more favourable than statutory minima and are binding when extended by ministerial order. Private-sector employees generally do not have to give advance notice before participating in a lawful strike. In public services, a representative trade union must normally submit notice at least five clear days beforehand,

	stating the reasons, location, starting time and intended duration, and negotiations must take place during the notice period. Strike time is unpaid: deductions are proportionate in the private sector, while specific deduction rules apply in public service. Forestry employers and contractors fall under collective agreements according to their activity. The National Collective Agreement for Agricultural, Rural and Forestry Works and Services Companies is particularly relevant to operational contractors. Public-sector employment has additional statutory and collective frameworks, but the commercial feedstock workforce is primarily governed by ordinary labour law. The Low Risk findings do not mean that the certificate holder is passive. Any credible stakeholder comment, media report or inspection observation concerning labour rights, employment conditions or PPE triggers investigation and reporting and may place biomass acceptance on hold. The Stakeholder Engagement Plan and Comments and Complaints Procedure are supplied to any interested party on request. Regarding TOF Landscape and Urban, the labour-law framework applies equally to workers employed by agricultural contractors, landscape and arboricultural companies, utility and road contractors and municipal services. Employer status changes the applicable collective agreement and social-security route, but not the rights to organise, bargain collectively and seek assistance from worker representatives or the Labour Inspectorate. Relevant institutes and law enforcement The Labour Inspectorate, organised through DREETS and DDETS/PP, can enter workplaces, inspect records, interview workers, require corrective action and refer offences. MSA combines social-security administration with occupational-risk prevention for forestry. URSSAF controls declarations and contributions. Police, gendarmerie and prosecutors handle criminal conduct. Trade unions, employee representatives and employer organisations negotiate collective agreements and can bring claims. The Défenseur des droits addresses discrimination. Conseils de prud'hommes decide individual employment disputes; ordinary and administrative courts address other labour and public-sector matters. ILO supervisory bodies, the Council of Europe, the EU and NGOs provide external scrutiny. Performance in practice and critical reviews France has mature labour institutions, formal worker representation and extensive social protection. Available government and international reviews identify labour-rights violations in parts of the economy, including occasional anti-union discrimination and vulnerability of migrant or undeclared workers. Those findings justify continued attention but do not demonstrate a frequent or structural forestry-sector problem.

	In 2023, the International Trade Union Confederation criticised the policing of demonstrations against pension reform, including reported beatings, arrests and tear-gas use, and raised concerns over the Government's refusal to negotiate with trade unions. This criticism concerned the wider French labour-rights environment and was not specific to forestry. The risk is Low, as the assessment found no structural problems in the forestry sector, and the limited issues identified were duly addressed through established institutions and regulations.
Risk Rating	Low Risk

France European areas	**Indicator**
4.1.2	Forced or compulsory labour shall not be used.
Supply Base Verifiers	Legislation and regulations Labour Code (Code du travail) Penal Code (Code pénal) Social Security Code (Code de la sécurité sociale) ILO Forced Labour Convention No 29 and Abolition of Forced Labour Convention No 105 National action plan against trafficking in human beings URLs ILO NORMLEX — France — https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102632 Council of Europe GRETA — France — https://www.coe.int/en/web/anti-human-trafficking/france Ministry of Labour — illegal work — https://travail-emploi.gouv.fr/le-travail-illegal French government — anti-trafficking policy — https://arretonslesviolences.gouv.fr
Risk Rating justification	• SBP benchmark: FSC — sufficiently covered; PEFC — sufficiently covered. • Trees Outside Forests: applicable in both Landscape and Urban categories. • SBE France: Low Risk for all ownership and certification categories and for TOF Landscape and Urban. Forced labour is prohibited and controlled through labour inspections and mandatory employee records. Cases occur in some sectors, particularly involving trafficking and vulnerable migrant workers, but no forestry-specific issue was identified. Policies and laws France has ratified ILO Conventions No. 29 and No. 105 on forced labour and the 2014 Protocol to Convention No. 29.

	See 4.1.1 for the common Labour Code, inspectorate, MSA and complaint framework. The Penal Code criminalises trafficking, forced labour, servitude and conditions contrary to human dignity. France has ratified ILO Conventions Nos 29 and 105 and operates national anti-trafficking policy. Employment declarations, payslips, working-time records and the single personnel register reduce opportunities to conceal coercive work. Forced labour can involve withheld identity documents, debt, threats, restriction of movement, abusive recruitment or non-payment rather than visible physical confinement. Supplier due diligence must therefore consider employment arrangements and vulnerable subcontracted or migrant labour, not only ask whether the employer has a registered company. Relevant institutes and law enforcement The Labour Inspectorate, URSSAF and MSA inspect employment and records; the Central Office for Combating Illegal Labour, police, gendarmerie and prosecutors investigate organised exploitation and trafficking. Victim-support organisations and trade unions provide reporting channels. See 4.1.1 for courts and certificate-holder escalation. Performance in practice and critical reviews Council of Europe and other reviews confirm that trafficking for labour exploitation exists in France, with vulnerable migrants and undeclared work presenting greater exposure. The evidence reviewed did not identify forestry as a sector with frequent or structural forced labour. Regarding TOF Landscape and Urban, management operations are often subcontracted by landowners, municipalities and infrastructure managers. Employee declarations, contracts, payslips, working-time records and subcontractor checks remain applicable to these short and dispersed worksites. The review did not find that forced labour is associated with French hedge, landscape or urban-tree management operations. The general trafficking and undeclared-work controls continue to apply. The risk is low, but any sign of coercion, retained documents, unexplained wage control, dependency on recruiters or employees and contractors unable to speak freely must trigger investigation and suspension under the procedure described in 4.1.1.
Risk Rating	Low Risk

Belgium European area	**Indicator**
4.1.2	Forced or compulsory labour shall not be used.
Supply Base Verifiers	• Laws and regulations, authorities, and law enforcement • Internet research into the issue of forced labour in practise

	Belgian Penal Code – Law of 17 April 1878 (Criminal Provisions) https://www.ejustice.just.fgov.be/eli/wet/1878/04/17/1878041750/justel Belgian Law on Protection of Victims of Human Trafficking (15 December 1980) https://www.ejustice.just.fgov.be/eli/wet/1980/12/15/1980121550/justel Myria – 2023 Annual Report on Human Trafficking and Smuggling in Belgium https://www.myria.be/files/2023_MYRIA_Annual_report_Trafficking_and_smuggling.pdf ILO Brussels – Protecting Victims of Forced Labour and Human Trafficking in Belgium https://www.ilo.org/wcmsp5/groups/public/---europe/---ro-geneva/---ilo-brussels/documents/publication/wcms_783904.pdf Human Rights Watch – Belgium Country Page https://www.hrw.org/europe/central-asia/belgium U.S. Department of State – 2023 Trafficking in Persons Report: Belgium https://www.state.gov/reports/2023-trafficking-in-persons-report/belgium/ Council of Europe GRETA – 3rd Evaluation Report on Belgium (Anti-Trafficking) https://rm.coe.int/3rd-greta-evaluation-report-on-belgium/1680a8940b De Groote – Belgian Coalition Agreement: “Justice – Victims First” https://degroote-deman.be/en/news/belgian-coalation-agreement-justice-victims-first/ See also indicator 4.1.1.
Risk Rating justification	See indicator 4.1.1 on main aspects related to the ILO conventions, as well as federal and regional legislation and law-enforcement. Belgium ratified the 1930 Convention on Forced Labour (No. 29) in 1944. In 2019 Belgium also ratified the Forced Labour Convention Protocol of 2014. Belgian legislation on work rights is conform to the European and international requirements. The criminal code article 433quinquies prohibits all forms of forced or compulsory labour, as also human trafficking and human smuggling. Belgium has a federal service of labour inspection that carries out inspections and checks compliance with aspects like permits, insurances and working conditions. These labour inspectors have a formal obligation to report to immigration authorities migrant workers in an irregular situation (if they are not detected as potential trafficking victims), if they come across them during workplace inspections. Compliance with aspects like taxes and social security contributions are checked by the tax office. According to the U.S. Department of State's 2023 Trafficking in Persons Report, the Belgium government generally enforces labour laws, though resource allocation and the efficacy of inspections and remediation efforts can vary. Legal penalties, including fines and imprisonment, are generally commensurate with other serious crimes. Instances of forced and compulsory labour persist, affecting primarily vulnerable individuals, including undocumented migrants, who are exploited in sectors such as restaurants, bars, retail, horticulture, cleaning businesses, agriculture, and construction." 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 harvesting work. It is not common to employ labourers on a temporary basis, except contractors and freelancers. It is, however, 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. Legally required documents or records are: - Register of personnel (or electronic 'dimona' declaration) - An individual bank 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'). 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. The Interfederal Center for Migration (Myria) reported (2023) that undocumented migrants vulnerable to labour exploitation work mainly in the sectors construction, agriculture, and hospitality. These sectors are often characterized by precarious working conditions and a high presence of vulnerable workers. According to GRETA (Council of Europe's Group of Experts on Action against Trafficking in Human Beings), Belgium should review facilitating access to legal aid for victims of intentional acts of violence. The Belgian government's 2025 agreement prioritizes a victim-centred justice system, aiming to enhance protection and streamline information delivery. This commitment includes the implementation of more efficient support mechanisms for victims and their families.
Risk Rating	Low Risk

Belgium European area	**Indicator**
4.1.3	Child labour shall not be used.
Supply Base Verifiers	• Laws and regulations, authorities, and law enforcement • Internet research into the issue of child labour in practise Belgian Penal Code – Law of 3 July 1978 (Employment Contracts) https://www.ejustice.just.fgov.be/eli/wet/1978/07/03/1978070303/justel Royal Decree of 3 May 1999 – Protection of Young Workers https://www.ejustice.just.fgov.be/eli/besluit/1999/05/03/1999012069/justel U.S. Department of State – 2023 Country Report on Human Rights Practices: Belgium https://www.state.gov/reports/2023-country-reports-on-human-rights-practices/belgium/ Federal Law on Child Labour of 5 August 1992 – RAGAS Compendium 2023 (PDF)

	https://ragas.online/wp-content/uploads/2023/10/COMPENDIUM-2023-BELGIUM.pdf Evaluation Summary – Integration of Decent Work into Value Chains (Belgium, 2023) https://diplomatie.belgium.be/sites/default/files/2023-11/Evaluation-Decent-Work-Summary-EN_1.pdf ILO Brussels – Country Information: Belgium https://www.ilo.org/brussels/countries/belgium/lang--en/index.htm UNICEF – Global Data on Child Labour https://data.unicef.org/topic/child-protection/child-labour/ Codex on Well-being at Work https://werk.belgie.be/nl/themas/welzijn-op-het-werk/algemene-beginselen/codex-over-het-welzijn-op-het-werk Belgian Labour Regulation – Youth Workers https://werk.belgie.be/nl/themas/arbeidsreglementering/jeugdige-werknemers Global March Against Child Labour https://globalmarch.org/ UNICEF – Child Labour Data and Research https://data.unicef.org/topic/child-protection/child-labour/# ACLVB – Sector PC146: Wages and Working Conditions https://www.aclvb.be/nl/pc-146-loon-en-arbeidsvoorwaarden#loon--en-arbeidsvoorwaarden See also indicator 4.1.1 and 4.1.2
Risk Rating justification	See indicator 4.1.1 and 4.1.2 on main aspects related to the ILO conventions, as well as federal and regional legislation and law-enforcement. Belgian minimum employment age is regulated by national instruments: - Law of 3 July 1978 (Employment Contracts): This foundational law sets general employment contract principles, including those for young workers, forming the core of Belgian labor code. - Royal Decree of 3 May 1999 (Young Worker Protection): This decree details protections for young workers, restricting work activities and regulating hours to safeguard their well-being and education. - Student Employment Regulations: Specific rules govern student work, including contract requirements, social contributions, and hour limitations, with recent minimum age adjustments The minimum age of employment is 15 years. People between the ages of 15 and 18 years may participate in part-time work/study programs and work full time up to a limited number of hours during the school year. They are not allowed to work more than 8 hours a day, and 38 hours a week, and the time they spend on their training counts as working time. The Ministry of Employment regulated industries that employ juvenile workers to ensure that labour laws were followed; it occasionally grants waivers for children temporarily employed by modelling agencies and in the entertainment business. The law clearly defines, according to the age of the child, the maximum amount of time that may be worked daily and the frequency of performances. The Federal Public Service Justice oversees the judicial aspects of enforcing laws against child labour.

	The forestry Collective Labour Agreement (CLA) for Forestry (PC146) does indicate the payment levels (coefficient of full payment) for employees of 16 and 17 year old. According to Human Rights Report of the USA Department of state (2023) the Belgian law prohibits the worst forms of child labour, and the government generally enforces these laws. Enforcement includes inspections, though resource allocation and effectiveness may vary. Penalties for violations of child labour laws are aligned with other serious crimes. While the report does not specifically highlight restaurants as a primary area of concern as in previous reports, it emphasizes the importance of continued vigilance and effective enforcement across all sectors. There are several international organisations and NGOs that study the issue of child labour. No references were found regarding child labour in the forest sector of Belgium (in this century).
Risk Rating	Low Risk

France European areas	**Indicator**
4.1.3	Child labour shall not be used.
Supply Base Verifiers	egislation and regulations Labour Code (Code du travail) Education Code (Code de l'éducation) ILO Minimum Age Convention No 138 ILO Worst Forms of Child Labour Convention No 182 Applicable rules on prohibited work for young workers URLs Légifrance — consolidated French legislation and Codes — https://www.legifrance.gouv.fr/liste/code?etatTexte=VIGUEUR Service Public — minimum age for employment — https://www.service-public.fr/particuliers/vosdroits/F1649 Ministry of Labour — young workers — https://travail-emploi.gouv.fr/les-jeunes-travailleurs ILO NORMLEX — France — https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102632 UNICEF — child labour data — https://data.unicef.org/topic/child-protection/child-labour/ MSA — work at height and rescue in arboriculture — https://alpes-vaucluse.msa.fr/lfp/documents/98795/20204459/Elagage Légifrance — collective agreement for landscape companies, IDCC 7018 — https://www.legifrance.gouv.fr/conv_coll/id/KALICONT000005635325
Risk Rating justification	• SBP benchmark: FSC — sufficiently covered; PEFC — sufficiently covered. • Trees Outside Forests: applicable in both Landscape and Urban categories. • SBE France: Low Risk for all ownership and certification categories and for TOF Landscape and Urban.

	The minimum employment age is 16, with regulated exceptions. Persons under 18 are generally prohibited from performing arduous or dangerous work. Child-labour is not a violation associated with the forestry sector in France. Policies and laws France has ratified ILO Convention No. 138 on minimum working age and Convention No. 182 on the worst forms of child labour. See 4.1.1 for the shared framework. The Labour Code prohibits employment below the statutory age except under controlled educational, apprenticeship or limited light-work conditions. Young workers receive enhanced working-time, rest, medical and safety protections; derogations from prohibited hazardous work are limited and supervised. Forest felling, extraction, chainsaws, mobile machinery, falling timber and steep terrain are inherently hazardous. A young person's presence on a worksite therefore requires clear evidence of lawful training status, age, supervision and permitted tasks; ordinary family ownership does not exempt commercial work from child-labour rules. Regarding TOF Landscape and Urban, the minimum-age and hazardous-work rules apply equally to these operations. Minors cannot normally perform dangerous chainsaw, wood-chipper, aerial-platform, climbing or tree-felling tasks; narrowly controlled derogations concern vocational training and require supervision and risk controls. This is particularly relevant to landscape apprenticeships, but the assessment found no structural child-labour problems in commercial hedge or urban-tree biomass supply. Relevant institutes and law enforcement The Labour Inspectorate verifies age, contracts, apprenticeships, prohibited work and working time. Educational bodies, occupational physicians and MSA contribute to apprentice and young-worker safety. Police and prosecutors act on serious exploitation. See 4.1.1 for complaint and suspension procedures. Performance in practice and critical reviews France has compulsory education, formal apprenticeship systems and effective birth and employment registration. International child-labour reporting does not identify metropolitan French forestry as a relevant sector of concern. The indicator is Low Risk. An apparently underage person performing productive forest work, especially with chainsaws or heavy machinery, is nevertheless a direct trigger for age and training verification and for suspension if evidence is unavailable.
Risk Rating	Low Risk

France European areas	Indicator
4.1.4	Workers shall not be discriminated in hiring, remuneration, access to training, promotion, termination or retirement.
Supply Base Verifiers	Legislation and regulations Labour Code (Code du travail) Penal Code (Code pénal) Law No 2008-496 of 27 May 2008 concerning discrimination ILO Equal Remuneration Convention No 100 ILO Discrimination Convention No 111 URLs Légifrance — consolidated French legislation and Codes — https://www.legifrance.gouv.fr/liste/code?etatTexte=VIGUEUR Défenseur des droits — discrimination — https://www.defenseurdesdroits.fr/lutter-contre-les-discriminations-188 Ministry of Labour — professional equality — https://travail-emploi.gouv.fr/legalite-professionnelle-femmes-hommes EIGE — gender equality in France — https://eige.europa.eu/gender-equality-index/2025/country/FR European equality-law network — France — https://www.equalitylaw.eu/country/france
Risk Rating justification	• SBP benchmark: FSC — sufficiently covered; PEFC — sufficiently covered. • Trees Outside Forests: applicable in both Landscape and Urban categories. • SBE France: Low Risk for all ownership and certification categories and for TOF Landscape and Urban. French law prohibits discrimination in all aspects of employment, with enforcement by the Labour Inspectorate and the Défenseur des droits. Research confirms that employment discrimination and a gender pay gap still occur in France. However, no evidence was found that discrimination is frequent or structural in the forestry sector. Policies and laws France has ratified ILO Convention No. 100 on equal remuneration, Convention No. 111 on discrimination in employment and occupation and Convention No. 156 on workers with family responsibilities. See 4.1.1 for the common framework. The Labour and Penal Codes prohibit discrimination based on protected characteristics including origin, sex, family situation, pregnancy, disability, health, age, beliefs, sexual orientation and union activity. Equal-pay and professional-equality provisions require objective treatment and, for covered employers, reporting and corrective measures. The prohibition applies to subcontractors, seasonal workers and legally

	employed foreign workers as well as permanent employees. Differences are lawful only when objectively justified by the work and proportionate; forestry's physical risks do not justify blanket exclusion unrelated to actual ability and accommodation. Regarding TOF Landscape and Urban, anti-discrimination and equal-treatment rules cover municipal tree crews, landscape companies, agricultural contractors and other TOF operators. Workers can use internal representation, unions, the Labour Inspectorate, the Défenseur des droits and employment courts. The assessment found no structural discrimination problems specific to TOF operations, although the same national weaknesses concerning recruitment discrimination and pay equality described for forestry remain relevant. Relevant institutes and law enforcement The Labour Inspectorate and Défenseur des droits investigate complaints; employee representatives and unions support workers; Conseils de prud'hommes can order compensation and reverse unlawful decisions. Criminal courts address penal discrimination. See 4.1.1 for the certificate-holder response to credible allegations. Performance in practice and critical reviews National studies document hiring discrimination and persistent gender-pay differences, showing that a strong legal framework does not eliminate individual cases. The forestry workforce is male dominated, which warrants attention to recruitment, facilities, pay and advancement, but available evidence does not establish a structural sector violation. The risk is Low, as the assessment found no structural problems in this area and identified issues are addressed through established procedures. Unexplained pay differences, discriminatory job advertisements, harassment, exclusion from training or retaliation following a complaint require further investigation. Any significant complaint or observation of violations of people's rights in general triggers further investigation; the SBP compliance status is suspended until the matter has been resolved.
Risk Rating	Low Risk

Belgium European area	**Indicator**
4.1.4	Workers shall not be discriminated in hiring, remuneration, access to training, promotion, termination or retirement.
Supply Base Verifiers	• Laws and regulations, authorities, and law enforcement • Internet research into the issue of discrimination in practise • Employment procedures and interviews with employees Anti-Discrimination Law of 10 May 2007

	https://etaamb.openjustice.be/nl/wet-van-10-mei-2007_n2007002099.html Gender Mainstreaming Law of 12 January 2007 (consolidated by IGVM) https://igvm-iefh.belgium.be/sites/default/files/downloads/Wet_gender_%20mainstreaming.pdf Racism and Xenophobia Law of 30 July 1981 https://www.ejustice.just.fgov.be/img_l/pdf/1981/07/30/1981001359_N.pdf UNIA – Legal Lexicon on Discrimination (Updated) https://www.unia.be/files/Documenten/Wetgeving/Lexicon_discriminatie_112019.pdf U.S. Department of State – 2023 Human Rights Report: Belgium https://www.state.gov/reports/2023-country-reports-on-human-rights-practices/belgium/ European Institute for Gender Equality – Gender Equality Index 2024: Belgium https://eige.europa.eu/gender-equality-index/2024/BE OECD – Gender Equality in Belgium (updated portal) https://www.oecd.org/en/topics/gender-equality.html PwC Belgium – 2023 Gender Pay Gap Report https://press.pwc.be/belgium-closes-gender-pay-gap-to-45-but-gender-inequality-remains-high See also indicator 4.1.1, 4.1.2 and 4.1.3
Risk Rating justification	See indicator 4.1.1, 4.1.2 and 4.1.3 on main aspects related to the ILO conventions, as well as federal and regional legislation and law-enforcement. In Belgium, discrimination is prohibited by law and is punishable by law. A judge can order a discriminating person to compensate the victim for the damage suffered. The relevant legislation: - Anti-Discrimination Law of 10 May 2007: Prohibits direct and indirect discrimination based on 13 protected criteria, including age, sexual orientation, civil status, birth, wealth, religious or philosophical belief, political opinion, language, current or future state of health, disability, physical or genetic characteristic, and social origin. - Gender Law of 10 May 2007: Specifically addresses discrimination based on gender, including provisions related to pregnancy and childbirth. - Racism and Xenophobia Law of 30 July 1981: Targets discrimination based on race, colour, descent, or national or ethnic origin. - Laws of 5 March 2002: Prohibit discrimination against fixed-term and part-time employees, ensuring equal treatment regardless of employment contract type. Those facing or witnessing discrimination within Belgium are encouraged to contact the Interfederal Centre for Equal Opportunities (UNIA) and the Institute for Equality between Women and Men, both of which provide rights advice and potential solutions. In 2023, UNIA recorded a consistently high number of discrimination complaints, indicating persistent societal issues. While precise annual percentage increases may vary, the overall trend demonstrates a sustained level of reported discrimination, with particular concentrations in employment and housing sectors.

	The anti-discrimination legislation is not applicable in cases qualified as harassment in the workplace. In such situations, the legislation on well-being at work is applicable. Therefore, in a case where the discrimination also constitutes harassment, the victim may choose the grounds on which he/she wants to start a law suit. If it is based on the legislation on well-being at work, the anti-discrimination legislation will not apply. Labour laws and regulations related to employment or occupation prohibit discrimination based on race, sex, gender, disability, language, sexual orientation or gender identity, HIV-positive status or other communicable diseases, or social status, but permit companies to prohibit outward displays of religious affiliation, including headscarves. The law requires companies with at least 50 employees to provide a clear overview of their compensation plans, a detailed breakdown by gender of their wages and fringe benefits, a gender-neutral classification of functions, and the possibility of appointing a mediator to address and follow up on gender-related problems. The law requires that one-third of the board members of publicly traded companies be women. According to the U.S. Department of State's 2023 Human Rights Report, the Employment and Labour Relations Federal Public Service continued to generally enforce labour regulations effectively, with penalties commensurate with similar violations. Federal and regional government ombudsmen maintained oversight, publishing reports on agency operations within their respective jurisdictions. UNIA remained a central entity responsible for promoting equal opportunity and combating discrimination across all levels of government (federal, regional, provincial, and local). The report affirms UNIA's continued high level of public trust, its independent functioning, and its adequate government funding, allowing it to effectively carry out its mandated responsibilities. Established in 2020, the Federal Institute of Human Rights serves as a complementary body, intervening when existing agencies like UNIA and Myria do not address specific human rights concerns. Its mandate focuses on providing recommendations to federal governmental bodies, ensuring adherence to international human rights treaties. While currently operating at the federal level, the institute aims to expand its reach through interfederal cooperation agreements with regional authorities, facilitating a more comprehensive human rights framework.. According to the European Institute for Gender Equality, Belgium's Gender Equality Index score in 2024 is 76.1. Belgium continues to score highly in Europe concerning earnings and gender equality. The OECD reports Belgium's gender pay gap as one of the lower in Europe, at 4.5%. This remains significantly lower than the EU average. Recent Belgian statistical data indicates nuances within sector specific gender pay gap data. Particularly, the idea that on an hourly basis, women earn more than men in the Public sector is a complex statistical matter, and needs very specific context to be accurate, and is not a general overview of the entirety of the Belgian economy. The main consensus is that a pay gap does exist in Belgium.
Risk Rating	Low Risk

Belgium European area	Indicator
4.1.5	Wages paid to workers shall meet or exceed the legal minimum wage or where there is no statutory minimum wage industry norms shall be met or exceeded
Supply Base Verifiers	• Laws and regulations, authorities, and law enforcement • Internet research into issues with wages in practise • Employment contracts and interviews with employees Federal Public Service Employment – Wages in Belgium https://werk.belgie.be/nl/themas/verloning/loon ACLVB – Joint Committee 146: Wages and Working Conditions https://www.aclvb.be/nl/pc-146-loon-en-arbeidsvoorwaarden#loon--en-arbeidsvoorwaarden Minimum Wage Database – Belgium's Joint Committees https://www.minimumlonen.be/jc_overview.html ITUC Legal Database – Labour Rights in Belgium https://www.ituc-csi.org/spip.php?page=legal_info&cc=BEL&lang=en See also indicator 4.1.1, 4.1.2 and 4.1.4.
Risk Rating justification	See also indicator 4.1.1, 4.1.2 and 4.1.4 on main aspects related to the ILO conventions, as well as federal, regional legislation and law-enforcement. Wage rates and labour conditions are agreed upon directly with the employer, through collective bargaining, or other means of negotiation. Inspectors from both the Ministry of Labour and the Ministry of Social Security enforce labour regulations. These ministries cooperate to ensure that wages and working conditions are consistent with the collective bargaining agreements. In Belgium, minimum wages and employment conditions are determined in the collective labour agreements (CLAs) concluded in the 'paritaire' committees (PCs). The sectoral agreements for collective labour agreements are established with the social partners of PC125 (wood industry), PC200 (clerical workers) and PC146 (forestry). For industries that don't have a minimum wage set by their committees, the nationwide Belgian minimum wage applies. The minimum wages in Belgium operate on a monthly basis rather than an hourly one. Maximum working hours are stated in the Law of 17 March 1987 on the introduction of new working arrangements in companies, to allow for the extension or adjustment of operating time in the company, the Labour Law of March 16, 1971 and the Law of January 4, 1974 on public holidays. The standard regime is 38 hours per week. Employees are entitled to four weeks of annual leave. Departure from these norms can occur under a collective bargaining agreement, but work may not exceed 11 hours per day or 50 hours per week. The forestry collective labour agreement (PC146) states the standard 38 hours, and lists, for example, under which (personal) circumstances an employee is entitled to a day or few days leave. In addition, daily work should be done between 6 am and 8 pm (because of the ban on night work). A rest period of at least 11 hours is required between work periods. Overtime is paid at a time-and-a-half premium on Monday through

	Saturday and double time on Sundays. The law forbids or limits excessive overtime. Without specific authorization, an employee may not work more than 65 hours of overtime during any one quarter. The Employment and Labour Relations Federal Public Service generally enforced wage and hour regulations effectively. The absolute lower limit for the wage is related to the guaranteed average minimum monthly income of the National Labour Council (NAR). The minimum wage databank contains an up-to-date overview of the applicable sectoral minimum wage scales. The database collects the gross wage data and adjusts it, as determined by the sectoral collective agreements (indexations and conventional wage increases). In addition to the wage scales, there are documents for each joint (sub)committee about the committee's area of competence, working hours, job classifications, seniority conditions, and premiums and allowances. There is an exclusion of certain matters from the scope of bargaining (e.g. wages, hours). The provisions of the Act of 26 July 1996 on the promotion of employment and the preventive safeguarding of competitiveness, as amended by the Act of 19 March 2017, lead to the setting of a maximum wage margin which severely limits the scope for collective bargaining and does not really allow for wage increases, not only at national level, but also at sectoral and company level.
Risk Rating	Low Risk

France European areas	**Indicator**
4.1.5	Wages paid to workers shall meet or exceed the legal minimum wage or where there is no statutory minimum wage industry norms shall be met or exceeded
Supply Base Verifiers	Legislation and regulations Labour Code (Code du travail) Social Security Code (Code de la sécurité sociale) Rural and Maritime Fishing Code (Code rural et de la pêche maritime) National Collective Agreement for Agricultural, Rural and Forestry Works and Services Companies Applicable extended sectoral and company collective agreements URLs Service Public — statutory minimum wage — https://www.service-public.fr/particuliers/vosdroits/F2300 Légifrance — collective agreements — https://www.legifrance.gouv.fr/liste/idcc MSA — employer obligations — https://www.msa.fr/lfp/employeur URSSAF — employer declarations and contributions — https://www.urssaf.fr Légifrance — collective agreement for landscape companies, IDCC 7018 — https://www.legifrance.gouv.fr/conv_coll/id/KALICONT000005635325
Risk Rating justification	• SBP benchmark: FSC — sufficiently covered; PEFC — sufficiently covered. • Trees Outside Forests: applicable in both Landscape and Urban categories.

	• SBE France: Low Risk for all ownership and certification categories and for TOF Landscape and Urban. France has a statutory minimum wage, supplemented in forestry by the National Collective Agreement for Agricultural, Rural and Forestry Works and Services Companies. Formal-sector employers generally comply with minimum-wage requirements, and research identified no frequent or structural underpayment in the forestry sector. Policies and laws France has ratified ILO Convention No. 95 on protection of wages, Convention No. 99 on minimum-wage fixing in agriculture and Convention No. 131 on minimum-wage fixing. See 4.1.1 for the common framework. The Labour Code establishes the SMIC and requires the employer to pay the higher of the statutory minimum and any applicable extended collective-agreement minimum. Overtime, paid leave, allowances and benefits must be calculated under law and the relevant agreement; deductions cannot reduce lawful remuneration improperly. Payslips and payroll declarations provide auditable evidence of hours, classification, gross and net pay and contributions. Piece-rate or productivity pay is permitted only when total remuneration still meets statutory and contractual minima for actual working time. Regarding TOF Landscape and Urban, the employer's actual principal activity determines the applicable pay framework. The extended collective agreement for landscape companies (IDCC 7018) expressly covers pruning, clearing and felling of roadside and ornamental trees; agricultural or forestry contractors and public municipal crews can fall under different agreements or public-service rules. In every case, the worker must receive at least the higher of the applicable collective-agreement minimum wage and the statutory SMIC. Relevant institutes and law enforcement The Labour Inspectorate, URSSAF and MSA inspect wages, declarations, hours and contributions. Employee representatives, unions and Conseils de prud'hommes can recover unpaid amounts. See 4.1.1 for complaint escalation and biomass suspension. Performance in practice and critical reviews Minimum-wage infringements and undeclared work occur in parts of the French economy, particularly where workers are vulnerable or subcontracting is opaque. The sources reviewed do not identify frequent or structural underpayment in the forestry sector. Low Risk is supported, but cash-only payment, missing payslips, unexplained deductions, inconsistent hours or classification below the collective-agreement minimum require investigation.

Risk Rating	Low Risk

France European areas	**Indicator**
4.1.6	Working hours shall comply with legal requirements.
Supply Base Verifiers	Legislation and regulations Labour Code (Code du travail) National Collective Agreement for Agricultural, Rural and Forestry Works and Services Companies Applicable extended sectoral and company collective agreements URLs Service Public — legal working time — https://www.service-public.fr/particuliers/vosdroits/F1911 Ministry of Labour — working time — https://travail-emploi.gouv.fr/le-temps-de-travail Légifrance — collective agreements — https://www.legifrance.gouv.fr/liste/idcc
Risk Rating justification	• SBP benchmark: FSC — sufficiently covered; PEFC — sufficiently covered. • Trees Outside Forests: applicable in both Landscape and Urban categories. • SBE France: Low Risk for all ownership and certification categories and for TOF Landscape and Urban. The statutory working week is 35 hours. Maximum working hours are 10 hours per day, 48 hours per week and an average of 44 hours per week over 12 weeks, subject to legally permitted agreements. Working hours are monitored by the Labour Inspectorate. A review of governmental and NGO sources identified no evidence of frequent or structural violations in the forestry sector. Policies and laws France has ratified ILO Convention No. 184 on safety and health in agriculture, which includes forestry activities within its scope and addresses working time, night work and rest periods. See 4.1.1 for the shared labour framework. The Labour Code regulates daily and weekly limits, overtime, compensatory rest, night work and minimum rest periods. Collective agreements can organise schedules and annualisation within statutory limits. Emergency forestry work after storms, fires or sanitary outbreaks does not remove legal fatigue and safety protections. Employers must maintain reliable working-time records where hours are not fixed collectively. Travel, preparation, equipment maintenance and waiting time must be classified according to law rather than omitted automatically from payable or regulated time.

	Relevant institutes and law enforcement The Labour Inspectorate can demand schedules and records and order compliance. MSA and occupational-health services address fatigue-related risk; unions, CSEs and Conseils de prud'hommes provide complaint and remedy channels. See 4.1.1 for certificate-holder escalation. Performance in practice and critical reviews Long days can arise in remote forestry operations and disturbance response, making records and rest particularly important. The evidence reviewed did not show frequent or structural violation in the sector. Low Risk is appropriate. Implausible delivery volumes, repeated very early and late work, absent timesheets or worker reports of unpaid hours require investigation together with indicators 4.1.5 and 4.1.10. Regarding TOF Landscape and Urban, municipal, landscape and agricultural employers remain subject to Labour Inspectorate and MSA controls appropriate to their status. Contracts can involve for example travel between small sites, emergency safety work and seasonal workloads. Travel and worksite time must be recorded according to the applicable employment regime, and emergency scheduling does not remove daily and weekly rest or maximum-hours requirements.
Risk Rating	Low Risk

Belgium European area	**Indicator**
4.1.6	Working hours shall comply with legal requirements.
Supply Base Verifiers	• Laws and regulations, authorities, and law enforcement • Internet research into issues with working hours in practise • Standard employment contracts and interviews with employees Belgium.be – Employment Legislation Overview https://www.belgium.be/en/work/employment_legislation Federal Public Service Employment –Working Time and Rest Periods https://employment.belgium.be/en/themes/international/posting/working-conditions-be-respected-case-posting-belgium/working-time-and Belgian Social Security – LIMOSA Mandatory Declaration for Foreign Employers and Self-Employed https://www.socialsecurity.be/site_nl/employer/applics/meldingsplicht/index.htm See also indicator 4.1.1, 4.1.2, 4.1.4 and 4.1.5.
Risk Rating justification	See also indicator 4.1.1, 4.1.2, 4.1.4 on main aspects related to the ILO conventions, as well as federal, regional legislation and law-enforcement. See also indicator 4.1.5 on more specifics on legal working hours. In Belgium, the legal working week is 38 hours. Apart from the legal working week, enterprises may alter working time in line with their companies' requirements. Workers may work appropriately remunerated overtime.

	If the employer has filled in a LIMOSA (A foreign employer (or his agent) who wants to post one of his workers to Belgium) declaration of posting, he is exempt for a period of 12 months from having to draw up the terms and conditions of employment as required by Belgian law. Nonetheless, it is reminded that, in the LIMOSA declaration of posting, the employer must specify the weekly hours of work and the work schedules that will be applicable during the workers' period of posting to Belgium. The LIMOSA declaration provides for information about the worker and the employer (place of employment, duration of posting, work schedule, etc.).
Risk Rating	Low Risk

Belgium European area	**Indicator**
4.1.7	Workers shall have access to health care provisions, sickness benefits, retirement benefits, invalidity benefits, death benefits, and workers' compensation
Supply Base Verifiers	• Laws and regulations. • Internet research on current practices. • Records of internal and external trainings of forest workers and sources. • Work place assessment results carried out by external company BeSWIC – Belgian Knowledge Centre for Occupational Well-being http://www.beswic.be/ EU-OSHA – Belgium: National Focal Point https://osha.europa.eu/en/about-eu-osha/national-focal-points/belgium Arbeidsongevallen in de Houtsector 2004 ILO NATLEX – Labour and Employment Legislation: Belgium https://www.ilo.org/dyn/natlex/natlex4.detail?p_lang=en&p_isn=83515 Belgian Social Security Portal https://socialsecurity.belgium.be/en SPW – Department of Nature and Forests (Wallonia) https://spw.wallonie.be/administrations/spw-agriculture-ressources-naturelles-et-environnement/departement-de-la-nature-et-des-forets Fedris – Federal Agency for Occupational Risks https://www.fedris.be/en/home.html Fedris – Annual Report 2022 https://www.fedris.be/sites/default/files/assets/NL/Jaarverslagen/jaarverslag_2022.pdf Fedris – Statistical Report 2023: Work Accidents in the Private Sector (Currently unpublished online; typically accessible via Fedris statistics page) See also indicator 4.1.1, 4.1.2, 4.1.4, 4.1.5, 4.1.6
Risk Rating justification	See also indicator 4.1.1, 4.1.2, 4.1.4, 4.1.5, 4.1.6 on main aspects related to the ILO conventions, as well as federal, regional legislation and law-enforcement. Belgium offers a legally enforced system that guarantees workers access to health care provisions, sickness benefits, retirement benefits, invalidity benefits, death benefits, and workers' compensation. The framework is based

	on national legislation, implemented through specialised federal agencies, and supported by targeted regional regulations relevant to the forestry sector. 1. Health Care Provisions and Sickness Benefits All persons who work in Belgium, including those in the forestry sector, are covered by compulsory health insurance, managed by the National Institute for Health and Disability Insurance (NIHDI/INAMI-RIZIV). This federal institution ensures the reimbursement of medical expenses and provides income support during periods of illness or incapacity. Employers must register employees with a recognised sickness fund and pay the required contributions. Self-employed forestry workers must affiliate independently. The system is universal, and failure to comply results in penalties and loss of coverage. INAMI also administers Income Replacement Allowances for individuals whose earning capacity is significantly reduced due to disability. These allowances form part of the broader invalidity protection under national law. 2. Retirement, Invalidity, and Death Benefits While not detailed extensively in forestry-specific legislation, retirement benefits are a standard element of Belgium's social security system. They are determined by the contributions made over a worker's lifetime and are processed through the National Pensions Office (RVP/ONP). Invalidity benefits are administered via INAMI, supporting workers unable to continue their occupation due to long-term illness or disability. Death benefits are provided to eligible dependants of deceased workers, offering a safety net in the event of premature death. These benefits ensure income continuity and are integral to Belgium's protection model. 3. Workers' Compensation and Occupational Risk Protection The Federal Agency for Occupational Risks (Fedris), a federal public institution supervised by the Minister of Social Affairs and Health, administers workers' compensation schemes. Fedris ensures compensation for workplace accidents and occupational diseases, including: Medical treatment; Replacement income; Rehabilitation and reintegration services. Accident data show that the forestry sector is not high-risk in Belgium. In the private forestry sector, incidents typically range between 1 and 3 annually, with some years reporting zero. In the public sector (agriculture, forestry, and fishery combined), educated workers report fewer than 10 injuries per year. For unschooled workers, incidents average 50 annually (33 in 2022). Employers must report accidents to Fedris and the National Social Security Office (RSZ/ONSS). Compliance with accident registration, insurance, and contribution obligations is monitored via regular audits. 4. Occupational Safety and Well-being Regulations Safety and well-being at work are governed by the Federal Public Service Employment, Labour and Social Dialogue. Within this FPS, the Directorate-General for Humanisation of Labour oversees the regulatory framework and coordination with social partners. Enforcement is conducted by the federal

	labour inspection agency (Arbeidsinspectie / Inspection du travail) and the unit Supervision of Well-being at Work, which monitors compliance with occupational safety, health standards, insurance coverage, working conditions, and permits. Inspectors have legal authority to conduct unannounced inspections and impose corrective measures or sanctions. Companies employing at least 20 workers must maintain a training plan, keep records of all workplace (near-)accidents, and submit an annual report naming the person responsible for health and safety. Employees have the legal right to remove themselves from dangerous work situations without risking their employment. However, the responsibility for identifying and assessing risks lies primarily with the employer and authorised inspectors. 5. Forestry Sector-Specific Measures The forestry sector in Belgium is subject to additional regulatory measures that strengthen worker safety and competence: The Flemish recognition scheme for harvesting companies (Erkenningsregeling exploitanten) requires mandatory training and certification before starting harvesting operations. Safety requirements are explicitly included in the regional terms and conditions of public wood sales and, in some cases, large private forests. These conditions are formalised in the houtcataloog (Dutch) or cahier des charges (French). Employers must instruct workers in safe work practices, including the correct use of machinery and protective equipment. Special emphasis is placed on the safety of machine operators and those directly involved in harvesting. 6. Administrative Oversight and Social Security Compliance Social security compliance in Belgium is ensured through mandatory employer declarations to the National Social Security Office (RSZ/ONSS), which calculates contributions and ensures prompt payment. Employers also manage sick leave procedures via the mutualities (health insurance funds) and keep detailed employee records for pension and invalidity entitlements. Audits are regularly conducted by Fedris and social security authorities to verify compliance.
Risk Rating	Low Risk

France European areas	**Indicator**
4.1.7	Workers shall have access to health care provisions, sickness benefits, retirement benefits, invalidity benefits, death benefits, and workers' compensation
Supply Base Verifiers	Legislation and regulations Social Security Code (Code de la sécurité sociale) Rural and Maritime Fishing Code (Code rural et de la pêche maritime)

	Labour Code (Code du travail) Applicable collective agreements and supplementary pension rules URLs MSA — social protection — https://www.msa.fr Service Public — social-security rights — https://www.service-public.fr/particuliers/vosdroits/N19810 Assurance Maladie — occupational accidents — https://www.ameli.fr/assure/droits-demarches/maladie-accident-hospitalisation/accident/accident-travail-trajet URSSAF — https://www.urssaf.fr Légifrance — collective agreement for landscape companies, IDCC 7018 — https://www.legifrance.gouv.fr/conv_coll/id/KALICONT000005635325
Risk Rating justification	• SBP benchmark: FSC — partially covered; PEFC — not covered. • Trees Outside Forests: applicable in both Landscape and Urban categories. • SBE France: Low Risk for all ownership and certification categories and for TOF Landscape and Urban. Employees in France, including legally employed foreign workers, are covered by statutory social-security provisions for healthcare, sickness, retirement, invalidity, death and occupational accidents. Research identified no frequent or structural exclusion of forestry workers from these benefits. Policies and laws France has ratified ILO Convention No. 102 on minimum social-security standards, covering the benefit categories relevant to this indicator. See 4.1.1 for the shared framework. The Social Security Code and Rural and Maritime Fishing Code establish compulsory insurance and benefits. Employers must declare workers, pay contributions and report occupational accidents. Coverage includes healthcare reimbursement, daily sickness benefits, pensions, invalidity and death benefits and occupational-accident/occupational-disease compensation subject to statutory conditions. Legal coverage depends on correct employment declaration. False self-employment and undeclared work can deprive workers of effective access even though the national scheme is comprehensive; this is why registration, payslips and MSA or URSSAF declarations remain relevant evidence. Regarding TOF Landscape and Urban, landscape and arboricultural companies, including businesses undertaking pruning and ornamental-tree felling, normally fall within the agricultural social-protection system administered by MSA. Municipal employees and some other contractors are covered through the public-service or general social-security systems. The employer must use the correct scheme and report accidents; TOF status does not reduce healthcare, sickness, pension, invalidity, death or compensation entitlements.

	Relevant institutes and law enforcement MSA is the principal social-security and occupational-risk institution for forestry employees and many self-employed forest workers. URSSAF controls other relevant declarations; pension and health bodies administer benefits. Labour Inspectorate, courts and worker representatives address non-declaration and denial of rights. See 4.1.1 for escalation. Performance in practice and critical reviews France has universal and occupational social-protection systems with routine payroll reporting. The review found no forestry-specific pattern of exclusion. The residual risk concerns undeclared or misclassified workers rather than the absence of benefits in law. Low Risk therefore applies across categories despite incomplete certification benchmarks. Missing declarations, a worker unable to identify their social-security coverage or an unreported accident must trigger investigation.
Risk Rating	Low Risk

France European areas	**Indicator**
4.1.8	Training shall be provided for all workers to allow them to implement the conditions set out in all elements of the SBP Standards relevant to their responsibilities.
Supply Base Verifiers	Legislation and regulations Labour Code (Code du travail) Rural and Maritime Fishing Code (Code rural et de la pêche maritime) Applicable machinery, first-aid and professional-training requirements Applicable collective agreements URLs Ministry of Labour — vocational and safety training — https://travail-emploi.gouv.fr/formation-professionnelle MSA — forestry risk prevention and training — https://ssa.msa.fr Vivea — training for agricultural and forestry entrepreneurs — https://vivea.fr Office national des forêts (ONF) — https://www.onf.fr Centre national de la propriété forestière (CNPF) — https://www.cnpf.fr MSA — work at height and rescue in arboriculture — https://alpes-vaucluse.msa.fr/lfp/documents/98795/20204459/Elagage
Risk Rating justification	• SBP benchmark: FSC — sufficiently covered; PEFC — sufficiently covered. • Trees Outside Forests: applicable in both Landscape and Urban categories. • SBE France: Low Risk for all ownership and certification categories and for TOF Landscape and Urban. French law requires persons engaged in forest operations to have training or experience relevant to their tasks. Compliance is monitored by the Labour Inspectorate, while participation in initial and continuing forestry training has increased since 2010. Research identified no frequent or structural lack of

	operational training in the sector. Policies and laws France has ratified ILO Convention No. 140 on paid educational leave and Convention No. 142 on vocational guidance and training. See 4.1.1 for the shared framework and 4.1.10 for safety procedures. The Labour Code requires employers to adapt workers to their jobs and provide safety training when hired, transferred, assigned new equipment or exposed to changed risk. Machinery authorisations, first-aid capability and professional qualifications apply according to task. National training does not automatically cover the certificate holder's exact SBP controls. Workers who identify sourcing sites, biodiversity values, documents, feedstock categories or non-compliance must receive instruction proportionate to those responsibilities and in a language and form they understand. Regarding TOF Landscape and Urban, training must match the work performed, including chainsaw and chipper use, directional felling, traffic control, mobile elevating work platforms, climbing systems, electricity-network proximity and public exclusion zones. Arborist climbers also require organised aerial rescue capability. MSA guidance states that workers progressing in trees need training in rescue organisation and that fall-protection equipment requires regular inspection. Relevant institutes and law enforcement The Labour Inspectorate and MSA verify safety training; employers, training bodies, agricultural schools, certification organisations and occupational-health services provide or document competence. CNPF and ONF deliver forest-management guidance. The certificate holder remains responsible for SBP-specific training records. Performance in practice and critical reviews France has established forestry education and contractor-training systems. Accident levels under 4.1.10 show that training must be maintained and adapted, but the sources reviewed do not show a structural absence of training. The risk is low. Missing induction, inability to explain relevant controls, operation of machinery without demonstrated competence or repeated implementation errors require corrective training and can result in suspension of biomass acceptance.
Risk Rating	Low Risk

Belgium European area	**Indicator**

4.1.8	Training shall be provided for all workers to allow them to implement the conditions set out in all elements of the SBP Standards relevant to their responsibilities.
Supply Base Verifiers	• Laws and regulations. • Internet research on current practices. • Records of internal and external trainings of forest workers and sources • Employment contracts and interviews with employees Belgian Federal Public Service Justice – Act of 3 October 2022 Establishing a Basic Safety Training for Temporary or Mobile Construction Sites https://www.ejustice.just.fgov.be/eli/wet/2022/10/03/2022206360/justel Employment Law Worldview – Belgium: Employee Training https://www.employmentlawworldview.com/belgium-employee-training-you-need-a-plan-and-fast/ FOD Werkgelegenheid – Opleidingsplannen https://werk.belgie.be/nl/themas/opleiding/opleidingsplannen See also indicator 4.1.1, 4.1.2, 4.1.4, 4.1.5, 4.1.6 and 4.1.7
Risk Rating justification	SBP normative interpretation: While workers are not required to be familiar with the SBP requirements themselves, their training must equip them to perform their duties competently, safely, and in a manner that complies with the SBP standards. See indicator 4.1.1, 4.1.2, 4.1.4, 4.1.5, 4.1.6 and 4.1.7 on main aspects related to the ILO conventions, as well as federal, regional legislation and law-enforcement. The Belgian Labour Deal that was voted through in 2022 established an individual right to training. Full-time employees are entitled to a training credit of five days per year. Employers with at least 20 staff (full-time equivalents) are required to prepare an annual training plan, which must be drawn up and registered with the Ministry of Employment by 31 March of the year in question at the latest (though see below on this). The plan can cover the coming year only or it can be drawn up to reach several years into the future if the employees or their representatives agree. The plan should include at least the formal and informal training the company wants to offer its employees. It must specify the target group(s) for which each of these training courses are intended. In addition, the plan should also take into account the gender dimension (meaning that access to training should not depend directly or indirectly on the gender of employees, for example by focusing training efforts on categories of employees where female employees are underrepresented). The employer is required, to pay particular attention to certain specific target groups for whom access to the labour market is more difficult, such as employees above the age of 50, employees who were unemployed when they were recruited, employees with reduced working capacity, employees in a bottleneck job (i.e. one for which there is a shortage of candidates) and employees below the age of 26 in a dual learning program. If the company has a works council or trade union delegation, the draft

	training plan must be submitted to it for consultation, at least 15 days before any meeting with management to discuss the plan. The works council or union delegation must give its opinion by 15 March at the latest. While it is good practice for the employer to be seen to consider that opinion, it Is not bound by it. The final content of the training plan must be adopted by 31 March. If there is no works council or union delegation, the training plan must be communicated to all employees by 15 March at the latest. There is in those circumstances no formal requirement for consultation but it still makes good sense to ask the employees if they have any views on the plan. The content of the training plan must again be finalised by 31 March. In principle, the plan should also be communicated to the Ministry of Employment, but how this is to be done in practice is yet to be determined by an appropriate Royal Decree, so for now, it is sufficient to keep a copy of the plan on company premises (or on the intranet).
Risk Rating	Low Risk

Belgium European area	**Indicator**
4.1.9	Mechanisms shall be in place for resolving grievances and disputes in the workplace.
Supply Base Verifiers	• Laws and regulations • Internet research into practical issues on solving dispute Federale Ombudsman België – Officiële Website https://www.ombudsman.be/nl CEPANI – Belgian Centre for Arbitration and Mediation https://www.cepani.be/ Belgium.be – Organisation of Justice https://www.belgium.be/en/justice/organisation Belgium.be – Employment Legislation https://www.belgium.be/en/work/employment_legislation Belgium.be – Out-of-Court Dispute Resolution https://www.belgium.be/en/justice/ways/conflict_resolution European e-Justice Portal – Out-of-Court Procedures in Belgium https://e-justice.europa.eu/491/EN/out_of_court_procedures__practical_information?BELGIUM&init=true See also indicator 4.1.1, 4.1.2, 4.1.4, 4.1.5, 4.1.6, 4.1.7 and 4.1.8
Risk Rating justification	See also indicator 4.1.1, 4.1.2, 4.1.4, 4.1.5, 4.1.6, 4.1.7 and 4.1.8 on main aspects related to the ILO conventions, federal, regional legislation and law-enforcement. Main legislation and regulation on mechanisms for resolving grievances and disputes in the workplace: - Act on Private Investigations (2024): Establishes a strict regulatory framework for conducting workplace investigations, outlining employers' rights and limitations in investigating workplace incidents.

	- Anti-Discrimination Law of 10 May 2007: Prohibits discrimination based on 13 criteria, ensuring equal treatment and providing mechanisms for addressing grievances related to discrimination. - Whistleblowing Act (2022): Requires companies with at least 50 employees to establish internal reporting channels and procedures for reporting misconduct, including mechanisms for resolving related disputes. Organisations / ministries responsible for the legal basis: - Federal Public Service Employment, Labour and Social Dialogue (FPS Employment): Develops and enforces employment laws, including those related to dispute resolution mechanisms. - Federal Public Service Justice (FPS Justice): Oversees judicial aspects of dispute resolution, including court procedures and enforcement. - Centre for Arbitration and Mediation (CEPANI): Provides arbitration and mediation services to resolve commercial and civil disputes. The Belgium legislation also regulates questions related to grievances and disputes, including those relating to tenure and usage rights, forest management practices and work conditions. In the Belgian forest sector, grievances and disputes are rare. Landownership, land use rights, and civil and traditional rights are clearly determined and settled. Regarding forest management practices and occupational aspects, the duties and responsibilities of the involved parties are clearly defined in laws, regulations and sectoral agreements. Forest management plans are subject to stakeholder consultation prior to approval by the forest and nature administration and, in general, forest operations normally do not go unnoticed and local stakeholders have the possibility to express concerns. There are no indigenous people, or other people directly dependent on the forest for their livelihood. In Belgium various mechanisms exist on 'out-of-court' dispute settlement. Through negotiations, the opposing parties can try to find a satisfactory solution without going to court. The parties can ask (voluntarily) for the help (mediation, conciliation) of certain independent organisations, depending on the issue. In resolving labour disputes, the trade unions can assist in resolving disputes over working conditions. Prevailing practice is to include additional dispute resolution related statements in the working agreements. Regarding issues with public agencies or certain private services, one can, for example, contact the ombudsman. One can also go to court, the justice system is considered to be working properly. Belgium has a good governance score according to the World Bank Governance Index, and scores low on corruption according to Transparency international. In summary, Belgium has established a multifaceted framework for resolving grievances and disputes, encompassing legal regulations, employer obligations, and available dispute resolution mechanisms. Employers are legally obligated to implement these mechanisms, and employees have the right to access them.
Risk Rating	Low Risk

France European areas	Indicator
4.1.9	Mechanisms shall be in place for resolving grievances and disputes in the workplace.
Supply Base Verifiers	Legislation and regulations Labour Code (Code du travail) Code of Civil Procedure (Code de procédure civile) Law No 2016-1691 on transparency, anti-corruption and whistleblower protection, as amended Applicable collective agreements ILO Workers' Representatives Convention No 135 ILO Termination of Employment Convention No 158 URLs Service Public — Conseil de prud'hommes — https://www.service-public.fr/particuliers/vosdroits/F2360 Ministry of Labour — Labour Inspectorate — https://travail-emploi.gouv.fr/inspection-du-travail Défenseur des droits — https://www.defenseurdesdroits.fr Public Service — whistleblower protection — https://www.service-public.fr/particuliers/vosdroits/F32031
Risk Rating justification	• SBP benchmark: FSC — sufficiently covered; PEFC — sufficiently covered. • Trees Outside Forests: applicable in both Landscape and Urban categories. • SBE France: Low Risk for all ownership and certification categories and for TOF Landscape and Urban. French legislation and sectoral agreements provide mechanisms for resolving workplace grievances and disputes. Amicable resolution must be attempted before judicial proceedings, with mediation, arbitration and court proceedings available where necessary. Workplace disputes are reported to be rare in the forestry sector. Policies and laws France has ratified ILO Convention No. 135 on workers' representatives and Convention No. 158 on protection and appeal rights concerning termination of employment. See 4.1.1 for the common institutions. Workers may raise concerns with management, a CSE, union representative, occupational physician or Labour Inspectorate. Whistleblower and anti-retaliation protections apply in defined situations. Individual contractual disputes can be brought to the Conseil de prud'hommes, which includes a conciliation phase before adjudication. Collective disputes can involve bargaining, mediation, conciliation, arbitration or lawful industrial action. A supplier's internal grievance channel must be accessible, confidential where appropriate and understandable to subcontracted and migrant workers; it cannot require workers to waive statutory rights.

	Relevant institutes and law enforcement CSEs, unions, Labour Inspectorate, DREETS, occupational-health services, Défenseur des droits and Conseils de prud'hommes provide complementary routes. Courts can order compensation or corrective action. The certificate holder receives external comments through its published stakeholder and complaints procedures. Regarding TOF Landscape and Urban, workers have access to the same grievance routes as other workers: management, employee representatives, unions, occupational health services, the Labour Inspectorate and the Conseil de prud'hommes. Municipal employees additionally use public-service representation and administrative remedies. Short-duration worksites and subcontracting do not remove these mechanisms, so the principal contractor's procedure should remain accessible to temporary and subcontracted workers. Performance in practice and critical reviews The legal system is comprehensive and access is not structurally restricted for forestry workers. Small employers may lack a formal CSE below statutory thresholds, but workers still retain inspection, union and court channels. The risk is low, however, any indication of retaliation, inaccessible procedures, unresolved complaints or workers being afraid to speak triggers investigation and may place the biomass on hold under 4.1.1.
Risk Rating	Low Risk

France European areas	**Indicator**
4.1.10	Safeguards shall be put in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures.
Supply Base Verifiers	Legislation and regulations Labour Code (Code du travail) Rural and Maritime Fishing Code (Code rural et de la pêche maritime), forestry worksite safety provisions Social Security Code (Code de la sécurité sociale) Applicable machinery and personal-protective-equipment regulations Applicable collective agreements and company safety procedures URLs MSA — forestry occupational-risk statistics and prevention — https://ssa.msa.fr Ministry of Agriculture — forestry accidents and climate change — https://agriculture.gouv.fr/accidents-du-travail-en-foret-et-changement-climatique Ministry of Labour — occupational risk assessment — https://travail-emploi.gouv.fr/le-document-unique-devaluation-des-risques-

	professionnels-duerp INRS — forestry work prevention — https://www.inrs.fr/metiers/agriculture/foret.html MSA — work at height and rescue in arboriculture — https://alpes-vaucluse.msa.fr/lfp/documents/98795/20204459/Elagage
Risk Rating justification	• SBP benchmark: FSC — sufficiently covered; PEFC — sufficiently covered. • Trees Outside Forests: applicable in both Landscape and Urban categories. • SBE France: Low Risk for all ownership and certification categories and for TOF Landscape and Urban. French law requires task-specific training, PPE, machine safeguards, etc. Compliance is monitored by the Labour Inspectorate. The MSA (Mutualité sociale agricole) recorded 1,157 lost-time accidents in 2024, compared with 1,337 in 2021 and 1,734 in 2016. These included 140 serious non-fatal accidents and five fatalities, all in logging. Forestry remains hazardous work, but legal safeguards and enforcement are in place. Policies and laws France has ratified ILO Conventions No. 81 and No. 129 on labour inspection, Convention No. 184 on safety and health in agriculture and Convention No. 187 on the occupational-safety-and-health framework. Convention No. 155 on occupational safety and health was ratified on 16 February 2026 and enters into force for France on 16 February 2027. See 4.1.1 for the shared enforcement framework and 4.1.8 for training. Employers must prevent risks through a documented occupational-risk assessment (DUERP), adapt work organisation, provide suitable equipment and PPE, train workers and coordinate contractors. Forestry-specific Rural Code provisions address worksite planning, communication, emergency arrangements, isolated work and hazardous operations. The existence of a written policy is insufficient: procedures must be communicated and used. Relevant controls include chainsaw trousers, helmet, eye/face and hearing protection, high-visibility clothing, safety footwear, machine guarding, exclusion zones, felling plans, safe distances, communications and accessible first aid. PPE must be appropriate, maintained and worn correctly. Relevant institutes and law enforcement The Labour Inspectorate can stop dangerous work and impose or refer sanctions. MSA provides prevention services, insures occupational accidents and compiles statistics. Occupational-health services monitor fitness and exposure; employers, principal contractors and site coordinators share defined duties. Police and prosecutors investigate fatal or serious offences. Performance in practice and critical reviews The downward accident trend is positive, but the continuing serious and fatal cases demonstrate high inherent risk. Logging is more hazardous than many other sectors, so low legal risk cannot be interpreted as low physical hazard.

	FCBA research commissioned by the Ministry of Agriculture examined how climate change is altering occupational risks in forestry. The work analysed forest condition and accident patterns during 2011–2019, with particular attention to felling accidents and falling branches. Drought, storms, fires, pests and disease can weaken roots, trunks and crowns, making tree failure less predictable and increasing risks during salvage and post-disturbance operations. Higher temperatures add heat exposure. These changing hazards must be incorporated into workplace risk assessments and site planning, including weather-based scheduling, inspection of unstable trees, exclusion zones, suitable equipment and worker training. Regarding TOF Landscape and Urban, operations can involve risks that are less prominent in ordinary forest stands, including work at height, unstable or decayed trees, falling material above workers and the public, road traffic, buildings, underground services and overhead electricity lines. The DUERP and worksite plan must address competent tree assessment, exclusion and traffic zones, rigging, communication, PPE, equipment inspection and rescue. MSA guidance treats dismantling and aerial rescue as specialised trained operations. The risk is low, because binding safeguards, specialised oversight and enforcement are in place and no structural failure was identified. Any observation of missing, unsuitable or incorrectly used PPE, unsafe machinery, absent exclusion zones or poor worksite communication triggers immediate investigation and can place biomass acceptance on hold under 4.1.1.
Risk Rating	Low Risk

Belgium European area	**Indicator**
4.1.10	Safeguards shall be put in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures.
Supply Base Verifiers	• Laws and regulations, authorities, law-enforcement • Internet research into practical issues on solving dispute Settling in Belgium – Health and Safety at Work https://settlinginbelgium.be/en/work-and-retirement/health-and-safety-at-work BeSWIC – Europees kettingzaagcertificaat verplicht in Vlaamse overheidsbossen vanaf 1 september 2019 https://beswic.be/nl/blog/het-europees-kettingzaag-certificaat-verplicht-vanaf-1-september-2019-bossen-van-de-vlaamse-overheid Koninklijk Besluit van 07/04/2023 – Basisveiligheidsopleiding voor tijdelijke of mobiele bouwplaatsen https://www.ejustice.just.fgov.be/cgi_loi/change_lg.pl?language=nl&la=N&cn=2023040706&table_name=wet

	BeSACC-VCA – Veiligheidsopleiding en certificering voor aannemers https://www.besacc-vca.be/ FOD Werkgelegenheid – Arbeidsinspectie en inbreuken https://werk.belgie.be/nl/over-de-fod/inbreuken/de-arbeidsinspectie See also indicator 4.1.1, 4.1.2, 4.1.4, 4.1.5, 4.1.6, 4.1.7, 4.1.8 and 4.1.9.
Risk Rating justification	See indicator 4.1.1, 4.1.2, 4.1.4, 4.1.5, 4.1.6, 4.1.7, 4.1.8 and 4.1.9 on main aspects related to the ILO conventions, federal, regional legislation and law-enforcement. The main legislation dealing with occupational health and safety in Belgium is the Act of 1996 on the wellbeing of workers in the performance of their work, as subsequently amended. The Act states the following measures in relation to workers' wellbeing: work safety. protecting workers' health at work. The Royal Decree of 27 March 1998 outlines the internal and external services for prevention and protection at work, detailing the responsibilities of employers in implementing health and safety measures. In Belgium, a VCA certificate is not legally required for the forestry sector. VCA certification is a voluntary system that helps companies implement an effective safety management system. However, since 15 April 2023, a basic safety training course of at least eight hours has been mandatory in the construction sector for everyone working on temporary or mobile construction sites, including self-employed workers and employees from other sectors such as the metal and electrical industries. A valid VCA certificate may be considered equivalent in this context. Although this requirement specifically applies to the construction sector, completing a VCA training course can also contribute to improving workplace safety in the forestry sector. This obligation is established by the Royal Decree of 07/04/2023 establishing a basic safety training course for temporary or mobile construction sites and improving communication on temporary or mobile construction sites (Belgian Official Gazette, 13/04/2023) Furthermore relating to the Forest Decree Regulations: In Flanders, companies harvesting more than 50 m³ per year must obtain official recognition from the forest administration, which includes requirements for training, safety at work, legal employment, and payment of taxes. Also in Flandres as of September 1, 2019, it is mandatory for anyone operating a chainsaw in Flemish public forests to possess the 'European Chainsaw Certificate' (ECC). The Agency for Nature and Forests (ANB) aims to enhance the safety of chainsaw operators and prevent accidents through this measure." The Federal Public Service (FPS) for Employment, Labour and Social Dialogue is the competent national authority for health and safety at work. It is responsible for preparing, promoting and implementing the policy for well-being at work. The Directorate-General for Humanisation of Labour is Responsible for regulatory affairs and promoting well-being at work. The Labour Inspection – Supervision of well-being at work: Ensures compliance with occupational safety, health, and well-being standards. The Forest Administrations: Oversee the recognition of companies involved in timber harvesting, ensuring adherence to safety and legal requirements. Each company I obliged to establish and communicate the company wide

	training plan which is described in 4.1.6. Safety training should be included in those plans. In summary, Belgium's forest industry is governed by a robust framework of legislation and regulations aimed at safeguarding workers' health and safety. Employers are mandated to develop, communicate, and implement comprehensive policies and procedures, supported by certification systems like VCA and BeSaCC, to ensure a safe working environment. Enforcement is carried out by various authorities, including the Labour Inspection and Forest Administrations, to uphold these standards.
Risk Rating	Low Risk

Belgium European area	**Indicator**
4.2.1	Negative social and community impacts shall be identified and avoided.
Supply Base Verifiers	• Ratification of international conventions on traditional and civil rights. • Legislation and regulations, authorities, law-enforcement • Internet research on into practical issues on solving disputes SGI Network – Belgium: Social Policies (2019) https://www.sgi-network.org/2019/Belgium/Social_Policies Youth Wiki – Belgium (Flemish Community): General Context https://national-policies.eacea.ec.europa.eu/youthwiki/chapters/belgium-flemish-community/41-general-context U.S. Department of State – 2022 Human Rights Report: Belgium https://www.state.gov/reports/2022-country-reports-on-human-rights-practices/belgium/ U.S. Department of State – 2023 Human Rights Report: Belgium https://www.state.gov/reports/2023-country-reports-on-human-rights-practices/belgium/ OHCHR – UN Committee on Economic, Social and Cultural Rights: Dialogue with Belgium https://www.ohchr.org/en/press-releases/2020/02/committee-economic-social-and-cultural-rights-dialogue-belgium-discusses The Brussels Times – Alarming Decline of Flemish Forests https://www.brusselstimes.com/576749/losing-a-football-pitch-every-day-alarming-decline-of-flemish-forests Gazet van Antwerpen – Natuur en Bos moet eigen 'verboden toegang'-bordjes verwijderen in Postelse bossen https://www.gva.be/regio/antwerpen/kempen/mol/natuur-en-bos-moet-eigen-verboden-toegang-bordjes-verwijderen-uit-postelse-bossen-maar-het-bos-dat-toegang-geeft-tot-ecoduct-blijft-beschermd/40166078.html Het Laatste Nieuws – Boeren boos over aanplant bos op landbouwgrond https://www.hln.be/zoersel/boeren-boos-over-aanplant-bos-op-landbouwgrond-gras-zuivert-ook-lucht~a66ee1bb/ Radio 2 – Naya moet opletten in Wallonië https://radio2.be/lees/naya-moet-opletten-in-wallonie

	Het Nieuwsblad – Boswachters zetten wolvin Naya onder druk https://www.nieuwsblad.be/cnt/dmf20210210_96095765 Agentschap voor Natuur en Bos – Publieke Consultatie Natuurbeheerplannen https://natuurenbos.vlaanderen.be/inspraak-van-de-burger/natuurbeheerplannen-publieke-consultatie See also indicators 1.1.2, 1.1.5, 2.2.2, 4.1.9, 4.2.2, 4.2.3, 4.2.4, 4.2.5.
Risk Rating justification	See also indicators 1.1.2, 1.1.5, 2.2.2, 4.1.9, 4.2.2, 4.2.3, 4.2.4, 4.2.5. Environmental protection in Belgium is managed at the regional level, with each region—Flanders, Wallonia, and Brussels—having its own policies and regulations. The Flemish government oversees environmental protection through the "Agentschap voor Natuur en Bos" (Agency for Nature and Forests). Key areas include waste management, air and water quality, and biodiversity conservation. Businesses and individuals must comply with strict environmental permits, which are regulated through the "Omgevingsloket" (Environmental Service Portal). Wallonia's environmental policies are guided by its regional government, focusing on sustainable forestry, waste reduction, and pollution control. The Walloon Environmental Code highlights the significance of environmental impact assessments (EIA) for projects with potential environmental effects. Articles D.67, D.68, and Annexes VI and VII detail the requirements for these assessments. For projects not automatically subject to a full EIA, a "notice d'évaluation des incidences sur l'environnement" (mini-EIA) is mandatory to evaluate potential impacts. For larger projects, the competent authority determines whether significant environmental consequences are likely and whether a full EIA is necessary. This decision must be clearly justified and documented within the final permit. As an urban region, Brussels emphasizes air quality, energy efficiency, and green spaces. Environmental policies are tailored to address urban challenges, such as reducing emissions and promoting sustainable construction practices. Municipalities in Flanders, Wallonia, and Brussels are responsible for implementing land-use policies and issuing permits for activities that may impact local communities. While forestry activities are often exempt from detailed environmental impact assessments, significant urban or infrastructure projects must undergo these assessments, ensuring that any major community impacts are identified and avoided early in the planning process. Belgium also incorporates Natura 2000 sites and other protected areas under the European Union's Habitats Directive. These sites are managed in a way that aims to avoid negative environmental and social impacts. Municipalities and regional authorities work to protect such areas from inappropriate land use and ensure compliance with EU conservation regulations. Environmental authorities, including the Flemish Environment Agency (Vlaamse Milieumaatschappij), Walloon Public Service (SPW), and Brussels Environment, are responsible for enforcing environmental and spatial planning regulations. These agencies ensure that projects comply with land-use plans and environmental standards. In addition, they monitor the environmental impacts of major development projects, with particular focus

	on those that may affect local communities. Regional planning authorities play a vital role in ensuring that public consultations are held, especially for projects that could lead to adverse social impacts, such as urban expansion, infrastructure development, and forestry operations. In Belgium, concerns regarding the social and community impacts of forestry are addressed through distinct regional channels. In Flanders complaints predominantly originate at the local level, with municipalities and councils serving as primary points of contact for issues like land use changes. Environmental NGOs, such as Bond Beter Leefmilieu and Natuurpunt, play a key role in advocating for sustainable management and addressing broader environmental concerns. The Flemish Government also receives formal complaints via public consultations and petitions. In Flandres there are processes for public review and comment on draft nature management plans. In Wallonia the regional authorities, including the Walloon Government and the Walloon Forest Department, are central to addressing grievances. Local communities engage with the Walloon Environmental Commission and town halls. Environmental NGOs like Nature et Progrès Wallonie and Greenpeace raise awareness of negative impacts, particularly concerning land access and use. Brussels-Capital Region: Complaints in Brussels focus on urban forestry and green space management. The Brussels Regional Government handles issues related to accessibility and urban development impacts. Citizen groups and urban-based NGOs are active in addressing reduced public access and environmental degradation. Key NTFPs gathering is mostly linked to property rights: The fundamental principle is that the ownership of forest land largely determines the rights to harvest NTFPs. Private landowners have the greatest control over what is gathered on their property. Public forests are subject to regulations set by the regional authorities. Regarding mushrooms, all regions enforce limitations on the quantity that can be harvested for personal consumption. Commercial harvesting necessitates obtaining permits, and the gathering of protected species is strictly forbidden. Similar regulatory frameworks govern the harvesting of berries, encompassing restrictions on quantity and prohibitions against the collection of protected species. The gathering of firewood is generally prohibited in public forests without explicit authorization. Private landowners, however, retain the right to harvest firewood on their own property. Finally, the collection of plants and herbs is regulated to protect vulnerable ecosystems, with a strict prohibition on the gathering of protected plant species. Community consultation in forest management plans is respected within modern Belgian practices, reflecting an increased awareness of stakeholder rights. Certified forest management schemes, such as those under PEFC or FSC, often mandate community engagement as part of their standards. Mechanisms for this consultation include public hearings and advisory committees, ensuring diverse local interests are considered. This integration aims to balance ecological sustainability with social and economic needs within forest management.

	Across all regions, common concerns for local communities include: loss of public access to forests, environmental degradation due to deforestation or poor management, and conflicts between commercial forestry and local community interests. These issues highlight the need for balanced forestry practices that consider both economic and social-environmental impacts. Belgium has comprehensive legislation in place to manage and mitigate negative social impacts resulting from land use, biomass procurement, and forestry operations. While most forestry activities are not subject to Environmental Impact Assessments, larger infrastructure or development projects, including those related to biomass procurement, are required to conduct assessments and public consultations. Based on the current regulatory framework and enforcement mechanisms, the risk of significant negative social impacts due to forestry operations or other land-use activities is deemed to be low, as long as these projects comply with established spatial planning and environmental regulations.
Risk Rating	Low Risk

France European areas	**Indicator**
4.2.1	Negative social and community impacts shall be identified and avoided.
Supply Base Verifiers	Legislation and regulations Forest Code (Code forestier) Environmental Code (Code de l'environnement) General Code of Local Authorities (Code général des collectivités territoriales) Code of Relations between the Public and the Administration National and Regional Forest and Wood Programmes Applicable ONF plans, SRGS and PSGs URLs Légifrance — consolidated French legislation and Codes — https://www.legifrance.gouv.fr/liste/code?etatTexte=VIGUEUR Ministry of Agriculture — forests and the wood sector — https://agriculture.gouv.fr/foret-bois Office national des forêts (ONF) — https://www.onf.fr Centre national de la propriété forestière (CNPF) — https://www.cnpf.fr National Commission for Public Debate — https://www.debatpublic.fr Vie-publique — public consultation and government reports — https://www.vie-publique.fr France Nature Environnement — forest issues — https://fne.asso.fr/dossiers/foret Cerema — protection of roadside avenues and tree alignments — https://outil2amenagement.cerema.fr/outils/la-protection-des-allees-et-alignements-darbres-bordant-les-voies-ouvertes-la-circulation Cerema — Espaces boisés classés covering parks, individual trees, hedges and alignments — https://outil2amenagement.cerema.fr/outils/lespace-boise-

	classe-ebc Ministry for Ecological Transition — Trame verte et bleue — https://www.ecologie.gouv.fr/politiques-publiques/trame-verte-bleue Ministry for Ecological Transition — Plan Nature en Ville and urban-tree vulnerability — https://www.ecologie.gouv.fr/sites/default/files/documents/Plaquette_NatureEnVille_Version_Courte.pdf Service-Public — when cutting or felling a garden tree requires permission — https://www.service-public.fr/particuliers/vosdroits/F31473
Risk Rating justification	• SBP benchmark: FSC — sufficiently covered; PEFC — sufficiently covered. • Trees Outside Forests: applicable in both Landscape and Urban categories. • SBE France: Low Risk for all ownership and certification categories and for TOF Landscape and Urban. The Regional Forest and Wood Programme (PRFB) covers both public and private forests. Its objectives are subsequently implemented through separate frameworks: ONF planning documents for public forests and the Regional Silvicultural Management Scheme (SRGS) for private forests. Consultation is not mandatory for every private-forest operation, but suspected legal breaches can be reported and disputes can be taken to court. Policies and laws Indicators 4.2.1–4.2.7 form a connected community-rights section. The Forest Code requires multifunctional management and establishes the National and Regional Forest and Wood Programmes. Public forests are governed through ONF management documents; private forests through SRGS and applicable PSGs. The Environmental Code provides public participation, environmental assessment, water, landscape, nature-protection and nuisance controls. Potential impacts include access and recreation disruption, traffic, noise, dust, road damage, fire risk, landscape change, water effects, damage to neighbouring property and loss of recognised use or heritage values. The need for consultation depends on the operation and legal trigger. Lack of a mandatory consultation for an ordinary private-forest cut is not itself non-compliance, but the operator must still respect applicable rights and avoid unlawful harm. The certificate holder's Stakeholder Engagement Plan and Comments and Complaints Procedure provide an additional reporting route. Any credible comment, public report or inspection observation concerning community rights or harm triggers investigation and may place biomass acceptance on hold. Relevant institutes and law enforcement The Ministry of Agriculture, DRAAF, DDT(M), prefectures, municipalities, ONF and CNPF implement forest planning. DREAL, OFB, water agencies, regional health agencies and protected-area managers cover environmental and health impacts. Departmental and municipal authorities manage roads,

	safety and local land-use issues. Regional Forest and Wood Commissions include authorities, owners, industry, environmental organisations and other stakeholders in programme development. Administrative and civil courts, mediators and complaint bodies provide remedies. The later indicators identify specialised bodies for basic needs, use rights, disputes and heritage. Performance in practice and critical reviews France has formal spatial planning, environmental law and accessible administrative and judicial procedures. Conflicts occur around individual clear-cuts, landscape change, recreation, roads or biodiversity, but the review did not identify frequent or structural community-rights violations across metropolitan feedstock sourcing. Regarding TOF Landscape and Urban, operations can affect shade, recreation, landscape character, traffic, noise, safety, privacy and local ecological connections. Public-tree owners normally communicate disruptive works and provide complaint channels, while major planning or environmental decisions can require participation. No national rule requires public consultation before every municipal or private-tree operation. The absence of consultation does not remove the need to identify affected neighbours, users, protected features and public-safety measures. The risk is low across all categories, as the assessment found no structural problems concerning community rights or material negative impacts. Community approval is not required for every lawful operation; relevant impacts and rights issues must be identified, avoided or resolved through the applicable procedures.
Risk Rating	Low Risk

France European areas	**Indicator**
4.2.2	Feedstock sourcing shall positively contribute to the local economy, including employment.
Supply Base Verifiers	Legislation and regulations Forest Code (Code forestier) National Forest and Wood Programme Regional Forest and Wood Programmes Applicable regional economic-development and forest strategies URLs Ministry of Agriculture — forests and the wood sector — https://agriculture.gouv.fr/foret-bois IGN — indicators of sustainable forest management — https://foret.ign.fr/IGD/en/

	INSEE — employment and enterprise statistics — https://www.insee.fr Agreste — forest and wood-sector statistics — https://agreste.agriculture.gouv.fr France Bois Forêt — sector information — https://franceboisforet.fr Forest cooperatives of France — https://lescooperativesforestieres.fr
Risk Rating justification	• SBP benchmark: FSC — sufficiently covered; PEFC — partially covered. • Trees Outside Forests: not applicable. • SBE France: Low Risk for all ownership and certification categories. Not applicable to TOF. Public forest harvests are scheduled in 15–20-year ONF plans; CNPF approved plans cover private forests above 20 ha. ONF, CNPF and state authorities oversee compliance. Regional programmes are developed by Regional Forest and Wood Commissions; local strategies by authorities, owners and forestry organisations, linking inventory data and timber mobilisation with rural employment and regional development. Policies and laws France has ratified ILO Convention No. 122 on the promotion of full, productive and freely chosen employment. See 4.2.1 for the shared programme and consultation framework. The Forest Code treats economic, environmental and social functions as complementary. PNFB and PRFB objectives promote sustainable timber mobilisation, local processing, skills, contractor capacity and rural development. Public procurement and subsidy conditions can add local implementation requirements without overriding EU market law. A positive contribution does not require every consignment to create a new job. It requires the sourcing model, taken at Supply Base level, to support lawful employment and viable forest-management and processing chains rather than cause a demonstrable net local harm. Relevant institutes and law enforcement Regional Forest and Wood Commissions, DRAAF, regional councils, ONF, CNPF, interprofessional bodies, chambers and local authorities develop and monitor strategies. INSEE, Agreste, IGN and sector bodies provide employment, enterprise and production data. Performance in practice and critical reviews Forest ownership is dispersed and many operations depend on local contractors, hauliers, nurseries, advisers and processors. Cooperatives and owner associations help mobilise wood and professional services. Employment effects vary by region and product, but no structural negative contribution by biomass sourcing was identified. The biomass sector can provide an outlet and additional income for genuine harvesting residues, low-grade wood and disturbance-damaged material. This income can support tending, access maintenance, salvage operations

	and post-fire, storm or pest reconstruction. Following major disturbances, biomass users can also absorb volumes temporarily exceeding regional storage or processing capacity. These benefits depend on the material lacking a substantial competing material use; describing an entire volume as low-grade or salvage does not establish that every assortment lacks an industrial outlet. For historical context, approximately 26 million m³ of wood was used for energy in 2017. The reported feedstock mix comprised 56% roundwood and forestry chips, 17% wood-industry co-products, 10% recycled wood, 10% black liquor and 7% processed fuels. Earlier sector estimates recorded approximately 28,000 forestry and logging jobs in 2017 and about 25,000 solid-biomass jobs in 2022. These are sector-wide figures and cannot be attributed exclusively to primary forest biomass. Low Risk is supported. Where a major project could redirect unusually large volumes away from established local processors or undermine employment, the local market effect should be considered together with the cascading assessment under 3.3.1.
Risk Rating	Low Risk

Belgium European area	**Indicator**
4.2.2	Feedstock sourcing shall positively contribute to the local economy, including employment.
Supply Base Verifiers	• Ratification of international conventions. • Legislation and regulations, authorities, law-enforcement • Internet research on the level of law enforcement in relation to forestry in Belgium • Databases (Eurostat and FAOstat) Convention on Biological Diversity (CBD) – Official Website https://www.cbd.int/ Nagoya Protocol on Access and Benefit-sharing – CBD https://www.cbd.int/abs/ UN Sustainable Development Goals – Goal 8: Decent Work and Economic Growth https://sdgs.un.org/goals/goal8 UN Sustainable Development Goals – Goal 12: Responsible Consumption and Production https://sdgs.un.org/goals/goal12 UN Declaration on the Rights of Indigenous Peoples (UNDRIP) – UN Human Rights https://www.ohchr.org/en/instruments-mechanisms/instruments/declaration-rights-indigenous-peoples Ratification Status of ILO Conventions – Belgium

	https://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102559 FAO – FAOSTAT Global Food and Agriculture Data https://www.fao.org/faostat/en/#home Eurostat – European Union Statistics Portal https://ec.europa.eu/eurostat/web/main/home IRENA – Renewable Energy Employment by Country https://www.irena.org/Data/View-data-by-topic/Benefits/Renewable-Energy-Employment-by-Country EUBIA – Employment Potential of Biomass in Figures https://www.eubia.org/cms/wiki-biomass/employment-potential-in-figures/ Federale Overheidsdienst Werkgelegenheid – Coronamaatregelen Arbeidsrecht België https://werk.belgie.be/nl/themas/coronavirus/coronamaatregelen-op-het-vlak-van-arbeidsrecht See also indicator 4.2.1.
Risk Rating justification	See also indicator 4.2.1. Several international frameworks support the principle that feedstock sourcing should contribute to the local economy and employment. The Convention on Biological Diversity (CBD) and its Nagoya Protocol promote benefit-sharing from natural resources, while the UN Declaration on the Rights of Indigenous Peoples (UNDRIP) affirms communities' rights to participate in and benefit from economic development. The UN Sustainable Development Goals (particularly SDGs 8 and 12) call for inclusive economic growth and responsible production. Belgium has ratified the CBD and the Nagoya Protocol, supports the SDGs, and has ratified most core ILO conventions. Forest residues still have a great biomass potential. Especially in Europe where, due to the high degree of utilization of industrial wood processing residues, sources of woody biomass for energy purposes are scarce. The use of low-grade forest residues for biomass production generates additional revenue for the landowner and employment for foresters and harvesting teams. The income makes it feasible to perform more often, and more complex forest maintenance operations. The biomass sector also makes it feasible to tidy up plots after they have been clearcut, making planting new trees easier. The biomass sector is sometimes the only sector that can generate income from necessary salvage and reconstruction operations, after forest fires, windfall, pest outbreaks, flooding etc. calamity. Without the biomass sector such operations would be done less. Considering the present policies to mitigate climate change risks in Belgian forestry, the biomass sector will play an important role, as present forests need to be transformed and new (mixed) forests need to be maintenance. In 2020, Belgium consumed 25.19 TJ wood pellets and 51.95 TJ solid biofuels. This level has stayed stable since. This solid biofuels category includes wood chips, bark, shavings and fuelwood. It are harvesting residues, by-products from the forest industry, and post-consumer recovered wood. Bioenergy is Belgium's largest source of energy, but the demand for specifically forest residue wood chips fluctuates. Currently all energy prices

	have risen and there is much demand for more renewable energy. FAOstat indicates the production of fuel wood increased with 29% in Belgium between 2008 and 2020. Considering the sharp increase in price for wood fuel, the economic turnover of on biomass production has increased even more. In Belgium in 2015, around 4,4 thousand people were working in forestry and logging (FAOstat). In 2021, around 1.3 thousand people were working in the solid biomass sector, of which nearly all in the woody biomass sector (IRENA). During the Corona pandemic the forestry sector was appointed a 'vital sector', unemployed people could start working in the forestry under favourable terms.
Risk Rating	Low Risk

Belgium European area	**Indicator**
4.2.3	Food, water supply or high conservation values (HCV) that are essential for the fulfilment of basic needs of communities shall be maintained or enhanced
Supply Base Verifiers	• Ratification of international conventions. • Legislation and regulations, authorities, law-enforcement • Internet research on the level of law enforcement in relation to forestry in Belgium Convention on Biological Diversity (CBD) https://www.cbd.int/ Hunting Belgium – General Hunting Information Portal https://hunting.be/ Hubertus Vereniging Vlaanderen (HVV) – Vlaamse Jagersvereniging www.hvv.be Fédération des Chasseurs de Wallonie – Chasse.be https://www.chasse.be Koninklijke Nederlandse Jagersvereniging – Jagen in België https://www.jagersvereniging.nl/jagen/jagen-in-het-buitenland/belgie
Risk Rating justification	The Convention on Biological Diversity (CBD) promotes the conservation and sustainable use of biodiversity, recognising that many communities depend on natural ecosystems for basic needs such as food, water, and health. It includes provisions to protect traditional knowledge and ensure communities benefit from biodiversity use (Articles 8(j) and 10(c)). Belgium signed the CBD on 5 June 1992 and ratified it on 22 November 1996. In Belgium, however, there are no communities that are directly dependent on the forests, or woodlands for their basic needs. No cases were found that indicate forestry or the harvest of feedstock conflicts with the fulfilment of certain basic needs, such as nourishment. Forests can play an important role in conserving (drinking) water catchment areas. The presence of such an area can influence forest management plans and the restrictions stated in felling licenses. In general, Belgium has laws and regulations, on minimizing the impact and pollution of ground water,

	surface water, and waterbody. Conservation measures regarding clean drinking water are in line with European laws. Water catchment areas, and areas which have been polluted in the past, are monitored. Hunting in Belgium is highly regulated. Hunting rights are linked to ownership of the land, but can be transferred or rented out. Except in the Brussels region, where all hunting is prohibited. In Flanders and Wallonia concessions are given to registered hunters. To be able to hunt in Flanders or Wallonia, possession of a Flemish or a Walloon hunting licence is mandatory. The basis of the Hunting Legislation is the Act of 1882, of which, however, only a few paragraphs remain in force till date. It has been extensively supplemented with a several Hunting Decrees and Implementing Decrees. Hunting, however, cannot be considered essential to the basic needs of any community in Belgium.
Risk Rating	Low Risk

France European areas	**Indicator**
4.2.3	Food, water supply or high conservation values (HCV) that are essential for the fulfilment of basic needs of communities shall be maintained or enhanced
Supply Base Verifiers	Legislation and regulations Public Health Code (Code de la santé publique) Environmental Code (Code de l'environnement) Forest Code (Code forestier) Applicable drinking-water catchment protection orders, SDAGEs and SAGEs URLs Eaufrance — drinking-water supply — https://www.eaufrance.fr/lalimentation-en-eau-potable French water agencies — https://www.lesagencesdeleau.fr INPN — national natural heritage inventories and protected-area data — https://inpn.mnhn.fr French Biodiversity Office (OFB) — https://ofb.gouv.fr
Risk Rating justification	• SBP benchmark: FSC — sufficiently covered; PEFC — sufficiently covered. • Trees Outside Forests: not applicable. • SBE France: Low Risk for all ownership and certification categories. Not applicable to TOF. HCV 5 is not applicable. No communities in metropolitan France directly and fully depend on forests for food, water or other basic needs. Also in general, forestry or feedstock harvesting in France does not threaten needs of communities. For example, water catchments are legally protected and monitored, and their presence may restrict forest management and harvesting. Policies and laws See 4.2.1 for the community-impact framework and 2.2.5 for water protection.

	The Public Health and Environmental Codes protect drinking-water abstractions, water quality and access to public supply. Forest foods, fuelwood, hunting and recreation can be locally important, but they are not generally irreplaceable basic-needs systems for metropolitan communities. Where a legally protected catchment, recognised local use right or exceptional dependency is identified, it must be treated as a site-specific value rather than dismissed because HCV 5 is generally not applicable. Catchment orders and water-management plans can impose binding operational restrictions. Relevant institutes and law enforcement Regional health agencies, prefectures, municipalities, water agencies, DDT(M), OFB and drinking-water operators administer catchment protection. ONF and CNPF integrate known constraints into plans. Use rights are addressed under 4.2.4. Performance in practice and critical reviews France has near-universal organised food and drinking-water supply and no identified metropolitan forest-dependent Indigenous or subsistence community. This supports the general non-applicability of HCV 5. The indicator remains Low Risk rather than irrelevant to every site: damage to a catchment, obstruction of a recognised local supply or credible evidence of exceptional dependency triggers investigation under 2.2.5 and 4.2.1.
Risk Rating	Low Risk

France European areas	**Indicator**
4.2.4	Legal, customary, and traditional tenure and use rights of Indigenous Peoples and local communities related to the Supply Base shall be identified, documented, and respected.
Supply Base Verifiers	Legislation and regulations Civil Code (Code civil) Forest Code (Code forestier), including affouage provisions General Code of Local Authorities Applicable title deeds, servitudes, municipal decisions and use agreements URLs Service Public — land and property information — https://www.service-public.fr/particuliers/vosdroits/F17759 ONF — communal forests and local authorities — https://www.onf.fr/aux-cotes-des-territoires French cadastral map — https://www.cadastre.gouv.fr/scpc/accueil.do FSC — National Risk Assessment for France — https://connect.fsc.org/document-centre/documents/resource/186 Service-Public / Civil Code — planting, boundary and neighbour rules —

	https://www.service-public.fr/particuliers/vosdroits/F614
Risk Rating justification	• SBP benchmark: FSC — sufficiently covered; PEFC — sufficiently covered. • Trees Outside Forests: applicable in the Landscape category. • SBE France: Low Risk for all ownership and certification categories and for TOF Landscape. Traditional community tenure rights are no longer widespread. Use rights persist locally, mainly in communal forests in north-eastern France. Recognised use rights are regulated. Municipalities can allocate firewood to eligible residents under the Forest Code and ONF supervision (affouage). Access to and collection in private forests require the owner's permission. Research identified neither denial of these rights, nor structural issues. Policies and laws ILO Convention No. 169 addresses Indigenous Peoples' tenure, consultation and participation rights, but France has not ratified it. See 1.1.2 for ownership and resource-use rights and 4.2.1 for the community framework. The Civil and Forest Codes recognise ownership, servitudes, usufruct and documented local use rights. Affouage allows a municipal council to allocate part of communal-forest products to residents under legally defined conditions and ONF administration where the "régime forestier" applies. Customary practice does not override a private owner's legal rights unless it has a recognised legal basis. Hunting, gathering, access, grazing or wood collection must follow ownership, local regulation and any formal right. Indigenous Peoples are addressed separately under 4.2.6. Natural products of privately owned land belong to the owner, and gathering mushrooms, berries, flowers or firewood therefore requires permission unless a recognised local right applies. In State forests, modest family collection of mushrooms and chestnuts is generally tolerated up to five litres per person per day where no stricter local rule applies; flowers are limited to a small handful for personal use. Prefectures, municipalities, forest owners and protected-area managers can impose stricter limits concerning species, quantities, dates, tools, access times and collection methods. Standing or fallen wood cannot be removed freely. Firewood requires purchase, owner permission, a communal affouage allocation or another established right. Hunting depends on the hunting right, owner permission or the applicable ACCA arrangement. Forest grazing similarly requires owner consent, a lease, concession or recognised customary right. Regarding TOF Landscape, rights can arise from ownership, a boundary hedge, an agricultural lease, a servitude, a municipal decision or a documented local practice. Small communal coppice areas and hedgerow wood can carry ecological and historical significance even where they fall

	below the forest definition. These rights are less standardised than affouage in a communal forest; the owner, beneficiary and authorised share of wood therefore follow the relevant title, agreement or municipal record. Relevant institutes and law enforcement Municipal councils, ONF, notaries, cadastre and land-registration services document communal ownership and rights. Civil courts address ownership and use disputes; administrative courts address public decisions. Owner associations and local authorities can clarify historical rights. Performance in practice and critical reviews Affouage and other recognised rights occur only in specific locations and are governed by established procedures. Owners, municipalities and operators generally respect valid rights, and biomass sourcing is not used to extinguish them. The risk is low. Supplier documentation and local consultation must nevertheless identify any affouage, servitude, lease or other right affecting the sourcing site. Unresolved conflicts are addressed under 4.2.5.
Risk Rating	Low Risk

Belgium European area	**Indicator**
4.2.4	Legal, customary, and traditional tenure and use rights of Indigenous Peoples and local communities related to the Supply Base shall be identified, documented, and respected.
Supply Base Verifiers	• Ratification of international conventions on traditional and civil rights. • Legislation and regulations, authorities, law-enforcement • Internet research on the level of law enforcement in relation to Belgium ILO Convention No. 169 – Normlex, ILO https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C169 Burgerlijk Wetboek / Code Civil 21.03.1804, Book II, Title IV, art. 516-710, articles 637 and the following on customary rights 'Erfdienstbaarheden' / 'Servitudes'. National Forestry Accounting Plan of Belgium (2019) https://www.cnc-nkc.be/sites/default/files/report/file/national_forestry_accounting_plan_-_belgium_-_18122019_1.pdf UNFCCC – National Inventory Document (1990–2022), submitted December 2024 https://unfccc.int/documents/644990 Agentschap voor Natuur en Bos – Vlaamse Bosinventaris: Bosareaal https://www.natuurenbos.be/vlaamse-bosinventaris/Website_BosAreaal.html Agentschap voor Natuur en Bos – Bosinventaris Resultaten https://www.natuurenbos.be/beleid-

	wetgeving/natuurbeheer/bosinventaris/resultaten#karakteristieken-bosareaal
Risk Rating justification	ILO Convention No. 169 affirms the rights of indigenous and tribal peoples to maintain their cultures, control their lands and resources, and participate in decisions that affect their lives and livelihoods. Belgium has not ratified this convention, likely because it has no indigenous or tribal populations as defined under international law, making its provisions inapplicable in the national context. There are no indigenous people in Belgium and no local communities dependent on the forest for their livelihood. The legal, customary and traditional tenure and use rights of local communities in general are respected. If contested, customary rights can determined in a court of law. Any customary rights should be recorded on the ownership document, when a property is sold. In the Walloon Region, some user rights still exist in certain municipalities.
Risk Rating	Low Risk

Belgium European area	**Indicator**
4.2.5	Mechanisms shall be in place for resolving grievances and disputes relating to tenure and use rights of the forest and other land management practices.
Supply Base Verifiers	• Ratification of international conventions on traditional and civil rights. • Legislation and regulations on traditional or civil rights • Internet research on the level of law enforcement in relation to forestry in Belgium Burgerlijk Wetboek / Code Civil 21.03.1804, Book II, Title IV, art. 516-710, articles 637 and the following on customary rights 'Erfdienstbaarheden' / 'Servitudes'. International Labour Organization (ILO) – Global Homepage https://www.ilo.org/global/lang--en/index.htm U.S. Department of State – 2021 Human Rights Report: Belgium https://www.state.gov/reports/2021-country-reports-on-human-rights-practices/belgium/ U.S. Department of State – 2023 Human Rights Report: Belgium https://www.state.gov/reports/2023-country-reports-on-human-rights-practices/belgium/ Ecopedia – Mushroom Picking Rules in Belgium (Flemish Region) https://www.ecopedia.be/pagina/plukken-van-paddenstoelen See also indicators 1.1.2, 1.1.5, 4.1.9, 4.2.4 and 4.2.6.
Risk Rating justification	See also indicators 1.1.2, 1.1.5, 4.1.9, 4.2.4 and 4.2.6. There are no indigenous peoples in Belgium, nor people claiming to be dependent on the forest for their livelihoods in a traditional way. No references were found on disputes or conflicts over traditional or civil rights directly related to the sourcing of wood and production of biomass in

	Belgium. Customary rights come into force when a specific land use was accepted 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 land). If contested, customary rights can be argued and determined in a court of law. In the Walloon Region. 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. Collecting non-timber forest products, as also roaming (private) forests are not a traditional or civil right in Belgium (often forbidden). This, however, has become an actual problem, as mushrooms are being collected and marketed. Forest inspectors no longer carry a service firearm and normally operate alone. In Flanders the prohibitions are listed in art. 97 of the Forest Decree. The article makes a distinction between public and private forests. In public forests and forest reserves, it is prohibited to remove 'fruits' without the permission of the owner and authorization from the Agency for Nature and Forests, or without it being included in an approved management plan. Moreover, the agreements regarding accessibility must also be taken into account: one should not leave the roads and paths (without authorization from the Agency). In private forests, picking fruits is not prohibited, but one does need the permission of the owner. In Wallonia, it is legally allowed to pick mushrooms with the permission of the owner (private property and municipalities). A volume of 10 litres per person per day is the maximum allowed amount of mushrooms one can gather. The U.S. Department of State's 2023 Human Rights Report indicates that Belgium continues to uphold traditional and civil rights, with the legal framework and judiciary providing avenues for redress in cases of individual abuse. Civilian authorities maintained effective oversight of security forces. Reported human rights concerns included instances of hate speech and attacks motivated by anti-Semitic and anti-Muslim sentiments, alongside violence targeting LGBT+ individuals. Authorities generally pursued investigations and prosecutions where credible allegations of human rights violations were made.
Risk Rating	Low Risk

France European areas	**Indicator**
4.2.5	Mechanisms shall be in place for resolving grievances and disputes relating to tenure and use rights of the forest and other land management practices.
Supply Base Verifiers	Legislation and regulations

	Civil Code (Code civil) Code of Civil Procedure (Code de procédure civile) Code of Administrative Justice (Code de justice administrative) Forest Code (Code forestier) Applicable title deeds, boundary records, contracts and administrative decisions General Code of Public Property (Code général de la propriété des personnes publiques) URLs Service Public — formal boundary determination — https://www.service-public.fr/particuliers/vosdroits/F3037 Service Public — mediation and dispute resolution — https://www.service-public.fr/particuliers/vosdroits/N19807 Administrative courts — https://www.conseil-etat.fr/tribunaux-cours Justice.fr — access to civil justice — https://www.justice.fr Service-Public / Civil Code — planting, boundary and neighbour rules — https://www.service-public.fr/particuliers/vosdroits/F614 Cerema — protection of roadside avenues and tree alignments — https://outil2amenagement.cerema.fr/outils/la-protection-des-allees-et-alignements-darbres-bordant-les-voies-ouvertes-la-circulation Service-Public — when cutting or felling a garden tree requires permission — https://www.service-public.fr/particuliers/vosdroits/F31473
Risk Rating justification	• SBP benchmark: FSC — sufficiently covered; PEFC — sufficiently covered. • Trees Outside Forests: applicable in both Landscape and Urban categories. • SBE France: Low Risk for all ownership and certification categories and for TOF Landscape and Urban. Forest ownership and use rights are clearly defined, and related disputes are rare. French law provides for amicable settlement, mediation, arbitration and judicial proceedings, including for disputes concerning forest management and use rights. Research identified no structural limitations in access to these mechanisms. Policies and laws See 1.1.2 for titles and boundaries, 4.2.1 for community concerns and 4.2.4 for local use rights. The Civil Code and Code of Civil Procedure provide remedies for ownership, boundary, nuisance, contract and servitude disputes. Formal bornage can be agreed or ordered by a court. Administrative law provides review of permits, public-forest decisions and authority action. The certificate holder's complaints procedure adds a sourcing-specific channel but does not replace statutory remedies. Biomass must be placed on hold where a credible unresolved dispute could affect the supplier's authority to harvest or the rights of another party. Relevant institutes and law enforcement Notaries, surveyors, mediators, municipal authorities, ONF, CNPF and land-

	registration services can clarify evidence and seek agreement. Judicial courts determine private ownership and use disputes; administrative courts review public decisions. Legal aid and rights-information services support access. Regarding TOF Landscape and Urban, common disputes concern boundary trees, jointly owned hedges, overhanging branches, damage, public-road trees or municipal permissions. Civil Code remedies begin with amicable settlement and can proceed to conciliation, mediation or the judicial court; permit and public-authority disputes use administrative review. Performance in practice and critical reviews Fragmented ownership and indivision can complicate decision-making, but available cadastral, notarial and judicial mechanisms are well established. The review did not identify a structural inability to resolve forest-tenure or management disputes. The risk is low. A pending dispute does not by itself make harvesting illegal. However, sourcing cannot proceed until the supplier's authority is verified and any injunction, formal objection or credible competing claim has been resolved.
Risk Rating	Low Risk

France European areas	**Indicator**
4.2.6	Where Indigenous Peoples' rights are identified in the Supply Base, and Free Prior and Informed Consent (FPIC) has not been achieved for the proposed and planned activities, a consultation and, if required, accommodation process shall be put in place.
Supply Base Verifiers	Legislation and regulations Constitution of 4 October 1958 European Convention on Human Rights UN Declaration on the Rights of Indigenous Peoples Ordinary French property, participation and local-government law URLs United Nations — Declaration on the Rights of Indigenous Peoples — https://www.un.org/development/desa/indigenouspeoples/declaration-on-the-rights-of-indigenous-peoples.html OHCHR — France — https://www.ohchr.org/en/countries/france
Risk Rating justification	• SBP benchmark: FSC — sufficiently covered; PEFC — sufficiently covered. • Trees Outside Forests: applicable in the Landscape category. • SBE France: Low Risk for all ownership and certification categories and for TOF Landscape because the FPIC trigger is not applicable in metropolitan France. Not applicable. There are no Indigenous Peoples in metropolitan France. Requirements concerning FPIC are therefore not applicable.

	Policies and laws ILO Convention No. 169 addresses Indigenous Peoples' tenure, consultation and participation rights, but France has not ratified it. France nevertheless supports the UN Declaration on the Rights of Indigenous Peoples and remains bound by general human-rights, property and participation law. The assessment is limited to metropolitan France, where no Indigenous Peoples are present; this conclusion also applies to all areas in scope (Forests and TOF). Overseas territories are outside the Supply Base. FPIC is therefore not applicable. This does not remove obligations toward municipalities, residents, landowners or holders of recognised use rights, which are addressed under indicators 4.2.1 and 4.2.4–4.2.5 through the applicable consultation, participation and grievance procedures. Relevant institutes and law enforcement No dedicated FPIC authority is required for the defined metropolitan Supply Base. Prefectures, municipalities, courts, ONF, CNPF and human-rights institutions continue to administer the ordinary rights and consultation framework referenced above. Performance in practice and critical reviews The review found no Indigenous People or Indigenous right within metropolitan feedstock sourcing that would activate the indicator's conditional process. The conclusion is scope-specific and would require reassessment if the Supply Base expanded to an overseas territory.
Risk Rating	Low Risk

Belgium European area	**Indicator**
4.2.6	Where Indigenous Peoples' rights are identified in the Supply Base, and Free Prior and Informed Consent (FPIC) has not been achieved for the proposed and planned activities, a consultation and, if required, accommodation process shall be put in place.
Supply Base Verifiers	See indicators 1.1.2, 1.1.5, 4.2.4, 4.2.5
Risk Rating justification	See also indicators 1.1.2, 1.1.5, 4.2.4, 4.2.5. There are no indigenous people in Belgium and no local communities dependent on the forest for their livelihood.
Risk Rating	Low Risk

Belgium European area	**Indicator**
4.2.7	Designated cultural heritage sites shall be preserved.

Supply Base Verifiers	• Ratification of international conventions. • Legislation and regulations, authorities and enforcement. • Protected areas and objects. • Internet research on critical publications. UNESCO – Belgium State Party Page (World Heritage Sites) https://whc.unesco.org/en/statesparties/be UNESCO – World Heritage Convention Overview https://whc.unesco.org/en/convention/ Decree of 28 September 2023 (Wallonia) – Cultural Heritage Protection https://etaamb.openjustice.be/nl/decreet-van-28-september-2023_n2024001483 Belgian Law of 9 April 2004 on the Protection of Immovable Heritage (Flemish Region) https://www.ejustice.just.fgov.be/cgi_loi/change_lg.pl?language=nl&la=N&cn=2004040935&table_name=wet Portail du Patrimoine – Fédération Wallonie-Bruxelles https://www.patrimoineculturel.cfwb.be COPAT – Consolidated Text on Protected Heritage in Wallonia https://www.patrimoineculturel.cfwb.be/fileadmin/sites/patrimoineculturel/uploads/DocuAdmin/copat-consolide-2.pdf Wallonie Patrimoine – Official Heritage Portal https://lampspw.wallonie.be/dgo4/site_patrimoine Bruxelles Environnement – Official Website https://environnement.brussels Brussels-Capital Region – Environmental and Heritage Management (IBGE) https://environnement.brussels/thematiques/patrimoine FARO – Flemish Interface Centre for Cultural Heritage https://faro.be See also indicator 2.1.1.
Risk Rating justification	See indicator 2.1.1 related to HCV 6. Belgium has ratified the World Heritage Convention in 1996 and is committed to protecting their World Heritage sites. The locations of world heritage sites in Belgium: The Grand-Place, Major Town Houses of the Architect Victor Horta, and the Stoclet House are all located in Brussels. The Major Mining Sites of Wallonia include four sites, while the Beguinages, consisting of 13 sites, are spread across the country. Additionally, Belgium is home to 33 of the 56 Belfries of Belgium and France. The Funerary and memory sites of the First World War (Western Front) include 43 sites across Belgium. Belgium has strong legal protections for its cultural heritage, with key legislation at regional levels: The protection of Walloon cultural heritage is now governed by the Decree of 28 September 2023, which replaces the former Heritage Code and outlines comprehensive provisions for heritage management. This legislation establishes procedures for property protection, integrates conservation practices, and defines the responsibilities of heritage authorities, including the organization of heritage meetings for project evaluation

	The protection of Brussels' cultural heritage is primarily regulated through the Brussels Code of Urbanism (BWRO), which came into effect in 2004 and consolidated previous ordinances. The Directorate of Cultural Heritage is responsible for the implementation of this legislation, including handling applications for safeguarding, protection, and restoration of heritage. Flemish regional laws, such as the Flemish Decree on Heritage (1991), align with the national framework but include regional initiatives for cultural heritage protection, focusing on the region's rich architectural history and other heritage assets. Responsible organisations for policy in Wallonia and Brussels: - Fédération Wallonie-Bruxelles: Oversees cultural heritage protection within the Walloon region and Brussels. - Walloon Heritage Agency (AWaP): Responsible for the conservation and management of heritage sites in Wallonia. - Brussels Institute for the Management of Nature and Forests (IBGE): Focuses on the preservation of cultural heritage in Brussels. In Flanders there is the Flemish Heritage Agency (Vlaamse Erfgoedorganisatie): Ensures the protection of cultural heritage within Flanders. In Wallonia and Brussels, regional inspection services are responsible for monitoring the condition and preservation of designated heritage sites. Complementing this, the Federal Inspectorate assesses and ensures nationwide compliance with heritage protection laws. In Flanders, the Flemish Heritage Agency conducts regular checks and audits to guarantee the conservation of cultural heritage within the region. Local enforcement is further supported by municipal heritage departments, which assist in upholding heritage preservation laws at the local level. This multi-tiered approach ensures comprehensive oversight and protection of Belgium's diverse cultural heritage. The three Belgian districts have identified and mapped cultural heritage sites and features, as also areas of national cultural significance. Some of these sites can be found in forests. Also archaeological sites and features have been identified and mapped. Regardless of the region, there's a legal obligation to report archaeological finds. This is to ensure that valuable historical information is not lost. In Flanders, the Agency for Immovable Heritage ("Onroerend Erfgoed") is the primary authority responsible for overseeing the protection of archaeological sites and heritage. There is a legal obligation to report any archaeological finds, ensuring that they are properly documented and preserved. Specific regulations govern the use of metal detectors and the handling of discovered artefacts to prevent unauthorized excavation or damage. The law provides strong protection for archaeological sites, safeguarding them from any activities that may threaten their integrity. In Wallonia, the Walloon Region is responsible for the preservation and management of archaeological heritage. According to Article 40 of the Code Wallon du Patrimoine, any accidental archaeological find must be reported to both the local municipal authorities and the landowner within eight days. The mayor is then required to forward this declaration to the Walloon government

	for further action and documentation. The Brussels-Capital Region also has regulations in place for the protection of archaeological heritage. Similar to the other regions, there is an obligation to report any archaeological finds to the relevant authorities. The region specifically focuses on safeguarding heritage within its urban environment, ensuring that archaeological sites are preserved amidst ongoing urban development and expansion. No references were found that indicate that such heritage sites are threatened by forest management.
Risk Rating	Low Risk

France European areas	**Indicator**
4.2.7	Designated cultural heritage sites shall be preserved.
Supply Base Verifiers	Legislation and regulations Heritage Code (Code du patrimoine) Environmental Code (Code de l'environnement) Urban Planning Code (Code de l'urbanisme) Convention concerning the Protection of the World Cultural and Natural Heritage Applicable designation orders, protection zones and management plans URLs Ministry of Culture — POP heritage platform — https://pop.culture.gouv.fr Ministry of Culture — archaeological atlas — https://atlas.patrimoines.culture.fr INRAP — preventive archaeology — https://www.inrap.fr UNESCO — Ancient and Primeval Beech Forests — https://whc.unesco.org/en/list/1133/ Géoportail — national mapping and aerial imagery — https://www.geoportail.gouv.fr Cerema — protection of roadside avenues and tree alignments — https://outil2amenagement.cerema.fr/outils/la-protection-des-allees-et-alignements-darbres-bordant-les-voies-ouvertes-la-circulation Cerema — Espaces boisés classés covering parks, individual trees, hedges and alignments — https://outil2amenagement.cerema.fr/outils/lespace-boise-classe-ebc Ministry for Ecological Transition — national protected-sites policy — https://www.ecologie.gouv.fr/politiques-publiques/politique-sites
Risk Rating justification	• SBP benchmark: FSC — sufficiently covered; PEFC — sufficiently covered. • Trees Outside Forests: applicable in both Landscape and Urban categories. • SBE France: Low Risk for all ownership and certification categories and for TOF Landscape and Urban. Cultural, historical and archaeological sites are identified and mapped, mainly by regional authorities. Designated heritage sites must be respected, and

	archaeological discoveries must be reported to the municipality. Potentially damaging activities are strictly regulated, for example within forest areas forming part of the UNESCO Ancient and Primeval Beech Forests site. Policies and laws See 4.2.1 for the community framework. The Heritage Code protects historic monuments, archaeological remains and heritage sites and establishes preventive archaeology and chance-find duties. Environmental and Urban Planning Codes add site, landscape and planning protections. UNESCO designation is implemented through domestic protection and management instruments rather than functioning as a stand-alone harvesting permit. Forest plans and operational preparation must identify mapped heritage and protect visible or potential remains such as earthworks, burial features, historic roads, charcoal platforms, buildings and culturally important trees. A previously unknown discovery must be left undisturbed and reported to the competent authority. Regarding TOF Landscape and Urban, trees can form part of designated heritage, including historic avenues, trees and parks around monuments, protected sites, sites “patrimoniaux remarquables” and landscape elements identified in a PLU/PLUi. The applicable Heritage, Environmental and Urban Planning Code permission must be obtained before operations can commence. Non-designated remarkable trees, traditional hedges and, where relevant, ancient forests (forêts anciennes—areas continuously forested since at least the mid-19th century) can indicate historical or cultural landscape value and should therefore be considered during screening. Their presence does not in itself constitute formal heritage protection; specific legal restrictions apply where the tree, site or landscape has been designated under the relevant heritage, environmental or planning legislation. Relevant institutes and law enforcement The Ministry of Culture, DRAC, regional archaeology services, INRAP, architects of historic buildings, prefectures and municipalities administer designation, permits and discoveries. ONF and CNPF incorporate known sites into forest documents; police and courts address damage and illegal excavation. Performance in practice and critical reviews At the date of this assessment, France had 56 properties on the UNESCO World Heritage List: 47 cultural, seven natural and two mixed properties. The transnational Ancient and Primeval Beech Forests of the Carpathians and Other Regions of Europe is the most directly forest-based natural World Heritage property involving metropolitan France. Its component parts protect examples of largely undisturbed beech-forest development and post-glacial expansion across Europe. No French

	World Heritage property was included on the List of World Heritage in Danger. National databases and management systems identify designated sites effectively, while forest cover can conceal previously unrecorded features. This residual discovery risk is managed through worksite observation and mandatory reporting rather than by treating all forest land as heritage. The risk is Low, as the assessment found no structural problems concerning cultural heritage. However, any mapped or unmapped feature indicating potential cultural value, including archaeological remains, remarkable trees, traditional hedges or ancient forest, triggers further assessment when identified through routine inspections, supplier discussions, or a request or complaint from residents or other stakeholders. Where legally protected values may be affected, the competent authority is consulted; for non-designated features, the SBE assesses whether they need to be conserved.
Risk Rating	Low Risk

Annex 2: EU RED Supply Base Evaluation

Countries where EU RED Supply Base Evaluation is used	
Country	France
Area	European areas
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 ☒ 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 applies due diligence, supplier declarations, supplier evaluations, and harvesting-plot assessments. This indicator stayed unchanged. The REDII Level A report for France rated it Low Risk and our 2025 review found no new information that would alter this conclusion.
(ii) Forest regeneration of harvested areas	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ 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 stayed unchanged. The REDII Level A report for France rated it Low Risk and our 2025 review found no new information that would alter this 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 ☒ 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	The legal framework allows such activities only under strict conditions, requiring approved management plans and/or permits. While we have concerns about outdated management plans and weaknesses in official monitoring and reporting, operations in practice contribute to nature protection. Our company does check if biomass harvesting interferes with the environmental goals of protected areas, although it is considered Low

	Risk.
(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 ☒ 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	SBP requires our company monitors the quality of performing 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 soil quality (best practices). An elaborate checklist is filled in on operational aspects. 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 ☒ 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 stayed unchanged. The REDII Level A report for France rated it Low Risk and our 2025 review found no new information that would alter this 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. *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:* *(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 ☒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	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 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. *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:* *(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 ☒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 forest habitats are under pressure. They occur both inside and outside Natura 2000 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 ecologically important forests are not yet formally protected but are recognised in management documents, forest plans, or ecological inventories. They also occur within regular forests, where they are not always identified or categorised. Specified risk applies mainly to the valuable Annex I forest habitat types, and to forests containing key elements of such habitats, on private lands outside protected areas. Suppliers provide the harvest-site geolocations and assist in identifying Annex I habitats. Our company monitors all biomass sourcing areas. 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. FSC certification is recognised as supporting evidence within this 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. *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:* *(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 ☒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 therefor 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. *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:* *(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 ☒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 tracts and small patches of heathland are present in France. As heathland is a No-Go area, it becomes a specified risk. Biomass sourcing is excluded. 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. *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 ☒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. The risk of conversion is low, but any indication of conversion triggers an investigation. Biomass is excluded from confirmed cases of converted land, unless the area is compensated lawfully. 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. *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 ☒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 today.
(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 ☐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	*Not applicable, requirement only applies to Level A*

LULUCF criteria 29(7)	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-endorsed EU RED Level A risk assessment for Article 29(7) LULUCF_v1.4
Level B management system at the level of the forest sourcing area	N/A

Countries where EU RED Supply Base Evaluation is used	
Country	Belgium
Area	European 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 ☒ 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 and a monitoring system on all supplies. 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 their operational performance. The EU RED Level B report assessed Wallonia and Flanders (but not the Brussels region). Considering Flanders, there are seldom legality concerns, however

	forest clearing without a permit rose in 2024, driven by a controversial legal loop allowing retroactive permits (avoiding fines). 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. Considering Wallonia, the REDII Level A report for Wallonia concluded Low Risk on this unchanged indicator. 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". Risk mitigation (general summary for each country and region): Suppliers provide the wood's origin (harvesting location) and proactively notify our company if they encounter key forest characteristics linked to specified risks. 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. Desk research must confirm with certainty that EU RED requirements are met. If there is any doubt, a field inspection of the sourcing area can be conducted. Random inspections are carried out 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 ☒ 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, reforestation is legally required under the Forest Decree and adequately enforced by the Nature and Forest Agency (ANB). For Wallonia, this indicator stayed unchanged. The REDII Level A report rated it Low Risk and our 2025 review found no new information that would alter this 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 ☒ 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 EU RED Level B report assessed Wallonia and Flanders. In both Belgian regions, the legal framework permits harvesting operations only under strict conditions, requiring approved management

	plans and/or permits. Operations have been closely monitored for several years and, despite occasionally being poorly documented, they generally contribute to the stated nature conservation goals. Our company has concerns about outdated plans, inaccuracies in standardised procedures, and weaknesses in official monitoring and reporting. In Wallonia rigorous harvesting of beech has been encountered to promote oak. Formally the situation is considered specified risk in Wallonia and low risk in Flanders, but our company checks if biomass harvesting interferes with the environmental goals of protected areas in any case.
(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 ☒ 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	SBP 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 soil quality (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 ☒ 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 this criterion is low risk 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. For Wallonia, this indicator stayed unchanged. The REDII Level A report rated it Low Risk and our 2025 review found no new information that would alter this 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. *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:* *(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 ☒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	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. *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:* *(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 ☒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 of high conservation value are under pressure; they occur in protected areas and in ordinary forests where they may not be identified. A specified risk applies to these habitats and to forests containing their key elements; management on private land and in mapped priority zones pending designation are investigated in detail. Public forest in Flanders is considered low risk, but assessed nonetheless. 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). Competent 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. *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:* *(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 ☒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. They are mapped and well protected. Non-natural, highly-biodiverse grasslands can be protected under environmental schemes and Natura 2000. Forest area in Belgium could have increased (since 2007) due to grassland conversion; therefore, our 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 conversion or degradation of high biodiverse grasslands 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. *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:* *(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 ☒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 tracks and small patches of heathland are present across these regions and excluded from biomass sourcing (No-Go areas). Most of these areas are found in protected areas and parks (mainly in Flanders). Our company and our suppliers are trained to identify heathland. The 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 species such as common juniper. 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. Overall, heathlands in Belgium depend entirely on active conservation management; both habitat loss and ecological pressures continue to threaten their long-term survival.
(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. *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 ☒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 (since 2007). Independent assessments show ongoing wetland decline (2007–2012) driven by drainage, urbanisation/infrastructure, and pollution, but not by 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 (since 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. Since 2007, conversion risk has decreased; but non-forestry conversions persist at a low level. Areas already converted to urban/infrastructure by 2025 are not a possible sourcing area. Biomass sourcing on wetlands trigger targeted biodiversity investigations to detect and address any deterioration of habitats. Any conversion plans will become apparent. 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. *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 ☒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 (since 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 (since 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 programme prioritise restoration, including removal of spruce on peat. Since 2023, CAP conditionality (BCAE-2) adds protection. Overall risk of conversion is low.
(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 ☐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	*Not applicable, requirement only applies to Level A*

LULUCF criteria 29(7)	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-endorsed EU RED Level A risk assessment for Article 29(7) LULUCF_v1.4
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 its suppliers. Firstly, every supplier signs an PEFC/SBP/RED self-declaration. Secondly, each supplier is visited and evaluated. Every type of feedstock of each supplier is assessed seperately (comprehensive checklist). When needed, risk mitigation measures are agreed upon with suppliers. This evaluation is performed once a year and more often if there are risks in the supply chain. The evaluation reports are stored along with the collected documents and photos.

Feedstock inspection and classification upon receipt

RED compliance for all types of feedstock and biomass is verified before and during procurement. Our company maintains tables of approved suppliers and their feedstock categories to facilitate verification of transport documents and invoices. Upon delivery, the correct feedstock or biomass type is visually checked. If there are supply chain risks, a reference sample may be retained. Procurement of RED-compliant feedstock and biomass is systematically documented.

Supplier audit for processing residues and post-consumer feedstock

All processing residues and post-consumer feedstock/biomass within the scope of RED evaluations is inspected at its point of first occurrence. The processes generating the residues and wastes are assessed. Checked is also if the supplier has equipment onsite that could process feedstock/biomass in such a way that it seems to be wood residues or wastes.

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: France - European areas

Not Applicable - only urban and landscape feedstock is used

Country: Germany - -

Not Applicable - only urban and landscape feedstock is used

Country: Belgium - -

Not Applicable - only urban and landscape feedstock is used

Country: Netherlands - European area

Not Applicable - only urban and landscape feedstock is used

Country: Luxembourg - -

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).