Supply Base Report:

ENERGIES RENOUVELABLES DES ARDENNES
First Surveillance Audit

Sustainable Biomass Program
sbp-cert.org



Completed in accordance with the Supply Base Report Template Version 2.0

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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Table of contents

1 Overview
2 Description of the Biomass Producer and the Supply Base
- 2.1 Description of the company
- 2.2 Detailed description of the Supply Base
- 2.3 Feedstock information

3 Supply Base Risk Assessments and Risk Management Measures
- 3.1 Summary of the Supply Base Evaluation
- 3.2 Conflicts with applicable national and sub-national legislation
- 3.3 Risk Management Measures

4 Stakeholder engagement
- 4.1 General description
- 4.2 Response to stakeholder comments

5 Report updates and approval
Annex 1: Detailed findings for Supply Base Evaluation indicators
Annex 2: RED II Supply Base Evaluation
Annex 3: SBP Processing residues and/or Post-consumer feedstock requirements
Annex 4: RED II detailed findings for Trees Outside Forest (TOF) feedstock

1 Overview

Producer name:	ENERGIES RENOUVELABLES DES ARDENNES
Producer address:	Z.I. Le Rouvrou 2, 6880 Bertrix, Belgium
SBP Certificate Code:	SBP-10-95
Geographic position:	49.883120, 5.275750
Primary contact:	Aurore Jacquet, +32 616 802 40, QERD@erda.be
Company website:	
Date report finalised:	25 Oct 2024
SBR reporting period from:	01 Oct 2023
SBR reporting period to:	30 Sep 2024
Name of the Certification Body:	Preferred by Nature OÜ
Certification Body Approval date:	23 Oct 2025
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, SBP Standard 6: Energy and Carbon Balance Calculation 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 v2.0
Feedstock origin (countries)	Belgium (-), France (Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté), Germany (-), 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

ERDA, also known as Énergies Renouvelables Des Ardennes, is a Belgian company that plays a significant role in the renewable energy sector, particularly in the production of green energy from local wood sources. Founded in 2005, ERDA is primarily engaged in producing electricity, pellets, and compressed logs from forestry and sawmill residues. This sustainable approach is part of their commitment to reducing environmental impact. A key aspect of ERDA's operation is its cogeneration plant. This facility simultaneously produces heat and green electricity by burning wood residues. The heat is used for drying sawdust to make pellets, and the electricity generated is sufficient to power the neighboring town of over 10,000 inhabitants, showcasing ERDA's self-sufficiency in utilizing its own green energy. The company's approach to raw material sourcing and product manufacturing reflects a commitment to environmental stewardship and sustainability. ERDA operates on a short circuit principle, using resinous residues from nearby forests, ensuring product homogeneity and avoiding stock shortages. This local sourcing also aligns with the company's strategy to minimize its environmental footprint while maintaining a continuous flow of raw materials. Furthermore, ERDA is a subsidiary of Fruytier, a family-owned company since 1946 and one of the top 20 European softwood sawyers. Fruytier's expertise spans from sourcing raw materials from nearby forests to delivering finished products, thus having full control over the wood industry. This partnership and integration enhance the sustainability and efficiency of ERDA's operations. With a legal status as a company limited by shares and an establishment date of June 1, 2005, ERDA has shown significant growth and impact in the wood industry.

Products included in the scope of SBP Certification: *WB 2.1 Wood chips*

Number of employees: *40*

Annual maximum production capacity (metric tonnes): *150000*

Number of direct feedstock suppliers: *26*

Approximate number of feedstock sub-suppliers: *3*

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

The organization has implemented PEFC physical separation systems with biomass (logs and wood chips) in the scope of their certificates. The process covers trade of biomass with physical possession. Valid PEFC system description and other documents exist. As a biomasss producer and end user, they buy low grade logs and wood chips at the gate of the installation and transfer to the cogeneration plant. Each load is registered and a mass balance is set up to track the feedstock.

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 RED II SBE is in the scope for each country separately.

Country	Belgium
Area/Region	-

Exclusions	
Feedstock types	Primary feedstock, Processing residues
Feedstock Product Groups	Forest feedstock (1A), Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock , SBP Controlled feedstock
Is the forest managed to supply energy and non-energy markets?	Yes - Majority
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:	
Feedstocks from Belgium are all SBP-controlled or SBP-compliant, as they are PEFC certified or controlled. Therefore, conducting an SBE for this supply area is generally unnecessary.	
Feedstock types included in SBE:	N/A
Includes RED II SBE:	Yes
Includes RED II TOF:	No
Size of Supply Base area (million ha):	3.0688
Map(s) of the Supply Base area:	



Country	France
Area/Region	Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté
Exclusions	
Feedstock types	Primary feedstock, Processing residues
Feedstock Product Groups	Forest feedstock (1A), Trees outside forest (TOF) - Agricultural land feedstock (3A), Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock , SBP Controlled feedstock
Is the forest managed to supply energy and non-energy markets?	Yes - Majority

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:	
Feedstocks from France are all SBP-controlled or SBP-compliant, as they are PEFC certified or controlled. Therefore, conducting an SBE for this supply area is generally unnecessary. However, an SBE is still required for feedstocks originating from agricultural TOF sources, as these are not covered by the PEFC. This additional assessment ensures that feedstock from these specific sources meets SBP requirements.	
Feedstock types included in SBE:	Primary feedstock
Includes RED II SBE:	Yes
Includes RED II TOF:	Yes
Size of Supply Base area (million ha):	54.9134
Map(s) of the Supply Base area:	



Country	Germany
Area/Region	-
Exclusions	
Feedstock types	Primary feedstock, Processing residues
Feedstock Product Groups	Forest feedstock (1A), Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock , SBP Controlled feedstock
Is the forest managed to supply energy and non-energy markets?	Yes - Majority
For the forests in the Supply Base, is there an intention to	Yes - Majority

retain, restock or encourage natural regeneration within 5 years of felling?	
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:	
Feedstocks from Germany are all SBP-controlled or SBP-compliant, as they are PEFC certified or controlled. Therefore, conducting an SBE for this supply area is generally unnecessary.	
Feedstock types included in SBE:	Primary feedstock, Processing residues
Includes RED II SBE:	Yes
Includes RED II TOF:	No
Size of Supply Base area (million ha):	35.7588
Map(s) of the Supply Base area:	



Country	Luxembourg
Area/Region	-
Exclusions	
Feedstock types	Primary feedstock, Processing residues
Feedstock Product Groups	Forest feedstock (1A), Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock , SBP Controlled feedstock
Is the forest managed to supply energy and non-energy markets?	Yes - Majority
For the forests in the Supply Base, is there an intention to	Yes - Majority

retain, restock or encourage natural regeneration within 5 years of felling?	
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:	
Feedstocks from Luxembourg are all SBP-controlled or SBP-compliant, as they are PEFC certified or controlled. Therefore, conducting an SBE for this supply area is generally unnecessary.	
Feedstock types included in SBE:	N/A
Includes RED II SBE:	Yes
Includes RED II TOF:	No
Size of Supply Base area (million ha):	0.2586
Map(s) of the Supply Base area:	


Royaume-Uni
Île de Man
Dublin
Manchester
Birmingham
Londres
Amsterdam
Pays-Bas
Hambourg
Allemagne
Paris
Munich
France
Suisse
Lyon
Milan
Monaco
Florence
Marseille
Italie

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:**

Picea abies	Norway spruce
Pseudotsuga menziesii	Douglas fir
Quercus petraea	Sessile oak
Quercus robur	Pedunculate oak
Carpinus betulus	European hornbeam
Fagus sylvatica	European beech
Fraxinus excelsior	European ash
Larix spp	Larch
Betula pendula	Silver birch
Tilia cordata	Small-leaved lime
Abies alba	European silver fi
Pinus pinaster	maritime pine

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: Forest harvesting may occur due to pests or diseases, or as a preventative strategy against such threats. The proportion of harvest due to these factors varies, but is a notable part of the overall feedstock. For instance, sanitary cuttings in response to spruce bark beetle infestations have made up to 30% of the total, although this is expected to decline. The impact of pests like pine beetles differs yearly and regionally.

e. **Hardwood (i.e. broadleaf trees): specify proportion of feedstock from (%)**: 15.00

f. **Softwood (i.e. coniferous trees): specify proportion of feedstock from (%):** 85.00

g. **Proportion of feedstock composed of or derived from saw logs by weight (%):** 1.00

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 (%):** 5.00

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, Offcuts

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

100.00 % PEFC

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

p. **Estimated amount of REDII-compliant sustainable feedstock that could be collected annually by the BP:** 130000 tonnes

q. **What is the estimated amount of REDII-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated):** 100000000.00 tonnes

Explanation: All of the feedstock will be REDII certified.

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). RED II Supply Base Evaluation details are reported in Annex 2.

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

3.1 Summary of the Supply Base Evaluation

The assessment of the supply base was conducted exclusively for agricultural TOF originating from France, specifically from the Hauts-de-France, Grand Est, and Bourgogne-Franche-Comté regions. This analysis revealed that the vast majority of SBP criteria pose a low level of risk, with the exception of certain ones detailed in section 3.

3.2 Conflicts with applicable national and sub-national legislation

No conflicts with applicable national & sub-national legislation are known.

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: France	
Area/sub-scope: Agricultural TOF	
Risk Assessment used:	
	☐ British Columbia, Canada ☐ Denmark ☐ Estonia ☐ Latvia ☐ Lithuania ☐ Quebec, Canada ☒ 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:	
Many wetlands have been transformed to meet agricultural needs. In Alsace, for example, around 46% of these predominantly wet areas are used for agriculture, primarily comprising wet grasslands and arable lands. While economically motivated, these transformations pose significant challenges for biodiversity conservation. Wetlands play a crucial role in biodiversity, water regulation, and carbon storage, making their preservation especially critical. Peat bogs, a specific type of wetland, are also threatened by unsustainable agricultural practices,	

particularly drainage for conversion into croplands. These activities increase the risks for these fragile ecosystems, which are known for their unique carbon storage capacity and role in hydrological regulation. Furthermore, permanent grasslands are often converted into croplands, leading to biodiversity loss and disruptions to natural ecosystems. Some wet grasslands are dedicated to livestock and market gardening. It is imperative to prioritize sustainable management of these areas to preserve their ecological functions. French regulations on wetland protection have evolved to better integrate sustainable agricultural practices and to assess the long-term impacts of land conversions on these ecosystems. Finding a balance between agricultural needs and the preservation of these areas is essential to support biodiversity and the vital ecological services they provide.
However, current regulations do not ensure that agricultural materials are produced on lands that have retained their wetland status since 2008. This is considered a specified risk.

Mitigation measure:

Before sourcing agricultural feedstock, ERDA will use regional cartographic tools or plot history to verify if the designated area was classified as grassland of over one hectare as of January 2008 or later. If confirmed as former grassland, ERDA will discontinue sourcing from that parcel.

Monitoring and outcomes:

Monitoring procedures:

- Annual verification of plots for any recent pasture conversion.
- Documentation in annual reports to ensure compliance.

Outcomes: If a plot is identified as former pasture, supply is halted.

Country: France

Area/sub-scope: Agricultural TOF

Risk Assessment used:

	☐ British Columbia, Canada ☐ Denmark ☐ Estonia ☐ Latvia ☐ Lithuania ☐ Quebec, Canada ☒ 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:

France has implemented a comprehensive system to manage and mitigate potential threats to areas of HCV through a combination of national regulations and conservation programs. Most HCV 1 and 3 areas in France, which include critical habitats for biodiversity and ecosystems of exceptional value, are encompassed by regulated areas such as national parks, nature reserves, Natura 2000 sites, biotope

protection orders, and zones managed by the Conservatory of Natural Areas. These areas are protected under stringent national, regional, and departmental laws, ensuring the conservation of both fauna and flora. According to a 2015 study by Bensettiti & Puissauve, 76% of Natura 2000 sites in France have established management plans. However, the study also indicated that pressures on these areas, including changes in hydraulic conditions, pollution, agriculture, and urbanization, have been identified. Monitoring and control systems for Natura 2000 sites are robust, with biotope protection orders and nature reserves being particularly well-managed.
Unfortunately, despite the existence of regulations, it remains challenging to adequately identify threats to ecosystems and habitats in agricultural zones.
There is therefore a specified risk for this HCV.

Mitigation measure:

The High Environmental Value (HVE) certification in France offers a concrete solution to mitigate the negative impacts of agriculture on HCV areas, particularly critical habitats for biodiversity and exceptional ecosystems. By encouraging farmers to adopt environmentally friendly practices such as reducing the use of pesticides, managing water resources sustainably, and promoting biodiversity, HVE helps reduce agricultural pressures on these sensitive areas. Complementing existing protections (national parks, Natura 2000 sites), it strengthens ecosystem conservation while ensuring the economic viability of farms, thereby addressing persistent challenges related to the protection of agricultural ecosystems.
The risk management measure is therefore to avoid sourcing materials from these HCV areas or to ensure that the farm from which the material originates is HVE certified.

Monitoring and outcomes:

Monitoring will involve compiling HVE certification confirmations and verifying the precise origin of the material to ensure it does not come from an HCV area.

Country: France

Area/sub-scope: Agricultural TOF

Risk Assessment used:

	☐ British Columbia, Canada ☐ Denmark ☐ Estonia ☐ Latvia ☐ Lithuania ☐ Quebec, Canada ☒ 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:

France has established a robust system to protect HCV areas, leveraging national regulations, conservation programs, and international directives. HCV 1 and 3 areas, which include critical biodiversity habitats and exceptional ecosystems, benefit from protections through national parks, nature reserves, Natura 2000

sites, and biotope protection orders. Strong legal frameworks and management plans, like those governing 76% of Natura 2000 sites, help mitigate pressures from hydraulic changes, pollution, urbanization, and agriculture. However, challenges persist in addressing threats to ecosystems in agricultural zones.
Mitigation measure:
The High Environmental Value (HVE) certification in France offers a concrete solution to mitigate the negative impacts of agriculture on HCV areas, particularly critical habitats for biodiversity and exceptional ecosystems. By encouraging farmers to adopt environmentally friendly practices such as reducing the use of pesticides, managing water resources sustainably, and promoting biodiversity, HVE helps reduce agricultural pressures on these sensitive areas. Complementing existing protections (national parks, Natura 2000 sites), it strengthens ecosystem conservation while ensuring the economic viability of farms, thereby addressing persistent challenges related to the protection of agricultural ecosystems. The risk management measure is therefore to avoid sourcing materials from these HCV areas or to ensure that the farm from which the material originates is HVE certified.
Monitoring and outcomes:
Monitoring will involve compiling HVE certification confirmations and verifying the precise origin of the material to ensure it does not come from an HCV area.

Country: France	
Area/sub-scope: Agricultural TOF	
Risk Assessment used:	
	☐ British Columbia, Canada ☐ Denmark ☐ Estonia ☐ Latvia ☐ Lithuania ☐ Quebec, Canada ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
4.1.4 Workers shall not be discriminated in hiring, remuneration, access to training, promotion, termination or retirement.	
Description of the specific risk:	
Hiring in the agricultural sector is regulated by national laws and collective agreements specific to this field. Employers must adhere to rules regarding different types of contracts (permanent, fixed-term, and temporary contracts), which detail aspects such as probation periods, the rights of seasonal workers, and specific conditions for recruiting temporary foreign workers (a common practice in this sector). For seasonal workers, special provisions are in place, particularly in harvesting activities. Seasonal fixed-term contracts offer flexibility tailored to the sector's needs while ensuring certain rights for the employees concerned. Regarding compensation, the agricultural sector is subject to the agricultural minimum wage, with possible adjustments through local collective agreements or branch agreements covering various specialties, such as market gardening or viticulture. These agreements set specific wage scales based on employees' skill levels and seniority. Furthermore, a system of social charge exemptions on overtime is intended to	

encourage seasonal labor, thus meeting the sector's specific needs.
Agricultural employees also have access to continuous professional training, managed by OCAPIAT (Opérateur des compétences de l'Agriculture, de la Pêche, des Industries Agroalimentaires et des Territoires), and training funds from the agri-food sector. The Personal Training Account allows them to pursue qualifying training. Additionally, employers are responsible for offering training as part of the skills development plan, contributing to the professional advancement of their employees.
To promote internal mobility and advancement, collective agreements in the sector often define criteria based on experience, qualifications, and ongoing training. These criteria may be established by company or branch agreements, enabling employees to progress within their career path on the farm.
The dismissal of agricultural workers generally follows labor law, with adjustments for seasonal jobs. A real and serious cause, such as an economic, disciplinary, or fitness-related reason, is required to justify a dismissal. Seasonal contracts naturally conclude at the end of the season, but in cases of early termination, standard dismissal rules apply. For larger farms laying off workers for economic reasons, implementing an employment protection plan may be necessary.
Finally, the retirement system for agricultural workers is managed by the Mutualité Sociale Agricole, which provides benefits tailored to the sector's characteristics. Retirement contributions are separate from other sectors and include specific arrangements for small farms and family-run operations. In addition to the basic pension, agricultural workers benefit from a mandatory supplementary pension, also managed by the Mutualité Sociale Agricole. In certain cases, workers who have held strenuous or hazardous jobs may be eligible for early retirement, offering a smoother transition to the end of their career.
Migrant agricultural workers in France often face precarious conditions, including low wages, long working hours, poor housing, and limited access to social protections. These challenges are exacerbated by irregular employment contracts, lack of legal documentation, and insufficient enforcement of labor laws. Exploitation remains prevalent, with many workers subjected to substandard living and working conditions. Seasonal roles, particularly in harvesting, heavily depend on migrant labor, which can heighten these vulnerabilities.
In northern regions such as Hauts-de-France, Grand Est, and Bourgogne-Franche-Comté, agriculture remains an important sector that employs migrant workers, particularly for labor-intensive activities. While these areas are less publicized than southern France in terms of labor rights issues, similar challenges of inadequate protections and exploitation can persist. These problems are highlighted in Oxfam reports, which underscore the difficulties faced by seasonal agricultural workers across the country, particularly those in insecure employment situations.
Considering these factors, we can conclude that the risk of employing migrant workers under inappropriate working conditions, even for energy purposes in the northern regions of France, is significant.

Mitigation measure:

It is essential to collaborate exclusively with companies that employ local, qualified, and contracted workers to harvest wood from agricultural sources or that can provide proof that working conditions are fully respected if foreign employees are hired.
Furthermore, given that this activity takes place during the off-season, the likelihood of untrained labor (such as migrant workers) being hired for this task is very low. Priority will also be given to agricultural wood harvested out of necessity, for example, as part of disease control or mandatory sanitary measures when burning is required to prevent the spread of infection.It is crucial to collaborate exclusively with companies that employ local, skilled, and contracted workers to harvest wood from agricultural sources. Since this activity takes place during the off-season, the likelihood of unskilled labor (such as migrant workers) being hired for the task is very low. Priority will also be given to agricultural wood harvested out of necessity, such as for disease control or mandatory sanitary measures, where burning is required to prevent the spread of infection.

Monitoring and outcomes:
The monitoring process will assess the nature of French suppliers. If the supplier provides wood sourced from agricultural activities due to sanitary regulations or pruning necessary for tree growth during the off-season, they will be classified as low-risk. Otherwise, they will be considered high-risk and excluded from ERDA's supply chain.

Country: France	
Area/sub-scope: Agricultural TOF	
Risk Assessment used:	
	☐ British Columbia, Canada ☐ Denmark ☐ Estonia ☐ Latvia ☐ Lithuania ☐ Quebec, Canada ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.5 Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.	
Description of the specific risk:	
France has taken steps to curb agricultural pollution, with programs like the Nitrates Directive and Nitrate Vulnerable Zones pushing farmers to manage fertilizers more responsibly. These measures have had some success, especially in regions where they've been properly enforced. A 2018 report from the Ministry of Ecological Transition even noted a drop in nitrate concentrations in certain rivers and aquifers. But enforcement is hit-or-miss, and where it's weak, the problems persist. The CAP has played a role too, offering incentives for organic farming, cutting pesticide use, and improving irrigation. Agri-environmental programs have pushed for things like buffer strips along rivers, which help reduce runoff. In some places, collaborative water management projects—bringing farmers and local stakeholders together—have helped balance agricultural needs with ecosystem protection. Pesticide contamination is another problem, with studies showing that over 60% of French rivers contain pesticide residues. In regions like Hauts-de-France and Grand Est, where cereal and beet farming dominates, chemical runoff has polluted major river basins like the Somme and the Meuse. Runoff from fertilizers has also caused eutrophication in lakes and rivers. In northern regions, phosphorus and nitrate runoff have been linked to algal blooms and declining water quality. Meanwhile, excessive water extraction continues to stress water resources, reducing river flows and harming aquatic ecosystems. There are efforts to address these issues (precision farming, agri-environmental measures, and stricter regulations). But widespread reliance on chemical inputs, coupled with uneven enforcement, limits progress. Tackling these challenges will require more than just policy tweaks; it calls for stronger oversight, incentives for sustainable farming, and better-funded local water management programs to balance agricultural productivity with environmental protection. The risk for this indicator is therefore specified.	
Mitigation measure:	

The High Environmental Value (HVE) certification in France provides a practical approach to mitigating the negative impacts of agriculture on water resources, including both surface and groundwater. By encouraging farmers to adopt sustainable practices such as optimizing irrigation, reducing the use of water-polluting inputs like pesticides and fertilizers, and implementing soil management techniques to minimize runoff, HVE contributes to the preservation of water quality and quantity.

This certification complements existing water protection regulations, such as those linked to the European Water Framework Directive, by promoting local water resource management at the farm level. HVE-certified farms play a key role in reducing agricultural pressures on water bodies, particularly in areas where over-extraction, nutrient pollution, or pesticide residues threaten aquatic ecosystems and drinking water supplies. By balancing environmental stewardship with farm economic viability, HVE addresses persistent challenges associated with sustainable water management in agriculture.

The risk management measure is therefore to avoid sourcing materials from farms that negatively impact water resources or to ensure that the farm from which the material originates is HVE certified.

Monitoring and outcomes:

Monitoring will involve compiling HVE certification confirmations and verifying the precise origin of the material to ensure it does not come from an area where agriculture is a major issue for water resources.

4 Stakeholder engagement

4.1 General description

Biomass Producer's stakeholder engagement start date: 25 Sep 2024

Biomass Producer's stakeholder engagement end date: 25 Oct 2024

Total number of stakeholders contacted: 30

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

As part of the stakeholder consultation process, the SBE document, along with a link to the SBP standards, was emailed to 30 regional stakeholders. They were given a 30-day period to submit their responses or comments. The consultation, launched before the audit, took place from September 25 to October 25, 2024. To ensure accessibility and inclusiveness, stakeholders were contacted via emails written in both French and English. Two responses were received, indicating no comments on the assesment conducted.

4.2 Response to stakeholder comments

Stakeholder description: N/A

Stakeholder comment: The responses during the consultation did not indicate any issues with the SBE.

Response to the stakeholder: No modifications to the SBE were therefore applied.

5 Report updates and approval

This document is: New Supply Base Report (Assessments/reassessments)

Summary of changes: N/A

Name	Aurore Jacquet
Title	Management representative
Date of report approval	25 Oct 2024

Annex 1: Detailed findings for Supply Base Evaluation indicators

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	Indicator
1.1.1	Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.
Supply Base Verifiers	• https://agriculture.gouv.fr/thematiques/loi-agriculture-et-alimentation • https://www.transparency.org/en/cp • https://agriculture.gouv.fr/egalim-1-ce-que-contient-la-loi-agriculture-et-alimentation • https://www.legifrance.gouv.fr/loda/id/JORFTEXT000037547946/2024-03-05/
Risk Rating justification	The regulation of feedstock sourcing and biomass production falls under a complex legal and regulatory framework that ensures compliance with national, European, and international standards. France enforces strict legislation to ensure that all agricultural operations adhere to environmental and legal standards. The EGalim 1 and EGalim 2 laws primarily aim to balance commercial relationships in the agricultural sector and ensure fair compensation for farmers. The EGalim 1 law, enacted on November 1, 2018, emphasizes reversing the price-setting process for agricultural products, which should be proposed by farmers, thus allowing better consideration of production costs in price negotiations. It also includes provisions for price renegotiations in cases of significant fluctuations in raw material and energy costs, while strengthening controls and penalties for non-compliance with these rules. The EGalim 2 law, introduced in October 2021, reinforces these measures by addressing circumventions of the previous law and further stabilizing farmers' incomes through the requirement for written, multi-year sales contracts. This law directly responds to shortcomings observed in the implementation of the EGalim 1 law, with a particular focus on protecting farmers' remuneration in the agricultural value chain. These laws also contribute to environmental protection by banning certain pesticides harmful to biodiversity and health and by strictly regulating the use of phytosanitary products, including the separation of sales and advisory activities for these products. France also actively participates in Natura 2000 and other international environmental agreements, such as the Convention on Biological Diversity and the Convention on International Trade in Endangered Species. Furthermore, France's robust regulatory system is supported by its high scores in global governance and transparency indices. France ranks favorably in Transparency International's Corruption Perception Index and the

	World Bank Governance Indicators, highlighting the country's strong legal infrastructure and control mechanisms. The risk of non-compliance in feedstock sourcing and biomass production is considered low in France.
Risk Rating	Low Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	**Indicator**
1.1.2	Legal ownership of land and resource use rights shall be respected.
Supply Base Verifiers	• **https://www.legifrance.gouv.fr/codes/section_lc/LEGITEXT000006071367/LEGISCTA000006152146/** • **https://www.geoportail.gouv.fr/donnees/parcelles-cadastrales**
Risk Rating justification	France's assessment as a low-risk country is reinforced by its high scores on the World Bank Governance Index and the Transparency International Corruption Perceptions Index. The country benefits from a stable framework for land rights, supported by a comprehensive land registry that dates back to the 19th century and is regularly updated. This registry clearly defines agricultural boundaries and ownership and is accessible online through platforms such as Geoportail. Furthermore, the Rural and Maritime Fishing Code in France establishes a legal framework for the protection, enhancement, and use of agricultural land, while promoting sustainable farming practices. This legislative framework aims to maintain the competitiveness and autonomy of agricultural enterprises, encourage organic farming, and support the economic development of rural areas through the promotion of short supply chains and quality-certified products. It also includes measures for managing agricultural risks and preventing food insecurity, thereby strengthening agroecological production systems and contributing to sustainable food systems.
Risk Rating	Low Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	**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	• https://www.legifrance.gouv.fr/codes/section_lc/LEGITEXT000006071367/LEGISCTA000006152146/ • https://cites.application.developpement-durable.gouv.fr/accueilInternaute.do • **https://www.legifrance.gouv.fr/jorf/article_jo/JORFARTI00002957**

	4000
Risk Rating justification	The Rural and Maritime Fishing Code plays a central role in establishing principles for the management, protection, and enhancement of agricultural lands. This code promotes sustainable practices and economic balance in agriculture, encouraging the development of short supply chains and a diversity of products with quality labels. It also aims to strengthen the autonomy of agricultural holdings and improve their competitiveness while respecting the environment. Additionally, the CITES Convention, integrated into French law, regulates international trade in endangered wildlife species to ensure their survival. In France, CITES directly impacts the trade of certain agricultural products, particularly in the overseas territories rich in biodiversity. As a major EU player, France contributes to legal trade while actively fighting against illegal and unsustainable trade, notably through seizures and strict regulations to protect biodiversity. These legislative and regulatory measures illustrate France's commitment to responsible agricultural management and biodiversity conservation, aligning national policies with international obligations to promote the sustainable use of natural resources. Another key law, Law No. 2014-1170 (Article 76) promulgated on October 13, 2014, concerns the future of agriculture, food, and forestry. The implementation of these laws and regulations is supervised by the Ministry of Agriculture, Food, and Forestry, along with its regional bodies, the Regional Directorates of Food, Agriculture, and Forestry. The risk regarding this indicator is therefore low.
Risk Rating	Low Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	**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	• https://www.legifrance.gouv.fr/jorf/id/JORFARTI000037548014 • https://agriculture.gouv.fr/suivi-des-mesures-en-faveur-des-agriculteurs • https://agriculture.gouv.fr/tout-comprendre-de-la-loi-egalim-2 • **https://agriculture.gouv.fr/la-reforme-de-lassurance-recolte** • **http://www.transparency.org/country**
Risk Rating justification	Current French legislation regarding payments for harvesting rights and raw materials in the agricultural sector includes several key aspects. Firstly, contracts for the sale of agricultural products intended for resale or

	processing must be made in writing and comply with specific rules established by law. These rules pertain in particular to transparency and price adjustments based on production costs and market prices, thus ensuring fair compensation for farmers. Additionally, the EGalim 2 law has introduced automatic price revision mechanisms to better reflect fluctuations in production costs and market prices. These mechanisms are especially important for contracts that set prices for agricultural products, where production cost indicators are used to adjust prices transparently. Furthermore, Basic Payment Rights represent decoupled payments, independent of the type of agricultural production but based on specific rights allocated to farmers. These rights, transferable between farmers under certain conditions, offer flexibility in managing agricultural subsidies within the framework of the Common Agricultural Policy. In response to increasing climate risks, the French government has also strengthened the crop insurance system. This includes raising the subsidy rate for insurance premiums and expanding subsidized coverage, encouraging more farmers to protect themselves against crop losses while ensuring better compensation in the event of damage. Regarding VAT, the likelihood of agricultural products being sold without an invoice is relatively low. As for other types of taxes, while tax fraud remains possible, existing controls generally help keep these risks relatively low.
Risk Rating	Low Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	**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	• **https://agriculture.gouv.fr/thematiques/loi-agriculture-et-alimentation** • **https://www.transparency.org/en/cp** • **https://agriculture.gouv.fr/egalim-1-ce-que-contient-la-loi-agriculture-et-alimentation** • **https://www.legifrance.gouv.fr/loda/id/JORFTEXT000037547946/2024-03-05/**
Risk Rating justification	For agricultural TOF in France: The regulation of feedstock sourcing and biomass production falls under a complex legal and regulatory framework that ensures compliance with national, European, and international standards. France enforces strict legislation to ensure that all agricultural operations adhere to environmental and legal standards. The EGalim 1 and EGalim 2 laws primarily aim to balance commercial

	relationships in the agricultural sector and ensure fair compensation for farmers. The EGalim 1 law, enacted on November 1, 2018, emphasizes reversing the price-setting process for agricultural products, which should be proposed by farmers, thus allowing better consideration of production costs in price negotiations. It also includes provisions for price renegotiations in cases of significant fluctuations in raw material and energy costs, while strengthening controls and penalties for non-compliance with these rules. The EGalim 2 law, introduced in October 2021, reinforces these measures by addressing circumventions of the previous law and further stabilizing farmers' incomes through the requirement for written, multi-year sales contracts. This law directly responds to shortcomings observed in the implementation of the EGalim 1 law, with a particular focus on protecting farmers' remuneration in the agricultural value chain. These laws also contribute to environmental protection by banning certain pesticides harmful to biodiversity and health and by strictly regulating the use of phytosanitary products, including the separation of sales and advisory activities for these products. France also actively participates in Natura 2000 and other international environmental agreements, such as the Convention on Biological Diversity and the Convention on International Trade in Endangered Species. Furthermore, France's robust regulatory system is supported by its high scores in global governance and transparency indices. France ranks favorably in Transparency International's Corruption Perception Index and the World Bank Governance Indicators, highlighting the country's strong legal infrastructure and control mechanisms. The risk of non-compliance in feedstock sourcing and biomass production is considered low in France.
Risk Rating	Low Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	**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	• https://natura2000.eea.europa.eu • https://inpn.mnhn.fr/accueil/zonages/znieff • https://eunis.eea.europa.eu/habitats/10187 • **https://nature-art17.eionet.europa.eu/article17/habitat/report/?period=5&group=Coastal+habitats&country=FR&region=**
Risk Rating justification	In France, several organizations play a vital role in identifying and studying key species, habitats, and high conservation value areas in the agricultural sector. These entities collaborate to reconcile agricultural production with biodiversity preservation, in line with national and European commitments.

	The OFB is a public institution under the supervision of the Ministries of Ecological Transition and Agriculture. It is responsible for research, expertise, and implementing public policies related to biodiversity. Its missions include monitoring species and habitats, managing protected areas, and supporting local stakeholders in adopting environmentally friendly agricultural practices. The MNHN conducts extensive research on French biodiversity. It oversees the national inventory of natural heritage, providing crucial data for the evaluation and conservation of species and habitats. This information is essential for guiding conservation policies and sustainable agricultural practices. The CENs are regional associations dedicated to preserving natural environments. They identify and manage ecologically significant sites, often located in agricultural areas, and work in partnership with farmers to promote practices that benefit biodiversity. This European network aims to protect habitats and species of community interest. In France, it covers approximately 13% of the territory, including many agriculturally rich landscapes with high biodiversity. Farmers operating in these areas are encouraged to adopt practices such as extensive grazing, reducing chemical inputs, and maintaining hedgerows, supported by agri-environmental and climate measures. Programs such as the Natural Areas of Ecological, Faunistic, and Floristic Interest identify areas of high ecological value, often in agricultural settings. These initiatives provide valuable data for the conservation and sustainable management of agricultural lands. This indicator is therefore considered low risk.
Risk Rating	Low Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	**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	• https://hal.science/hal-03530365/document • https://www.eea.europa.eu/themes/biodiversity/natura-2000 • https://inpn.mnhn.fr/docs/rapportages/Rapport_FR_art17_2015-63.pdf • https://hve-asso.com/la-hve/ • **https://agriculture.gouv.fr/planification-ecologique-et-agriculture-le-gouvernement-publie-la-strategie-ecophyto-2030** • https://www.ecologie.gouv.fr/politiques-publiques/pesticides-pollutions-diffuses • https://www.loire-atlantique.gouv.fr/Actions-de-l-Etat/Environnement/Eaux-et-milieux-aquatiques/Eau-et-agriculture/Directive-nitrate2/Directive-nitrate • **https://agriculture.gouv.fr/pour-une-meilleure-efficacite-du-**

	dispositif-de-protection-des-aires-de-captage-deau-potable • **https://agriculture.gouv.fr/un-guide-des-bonnes-pratiques-pour-ameliorer-la-qualite-de-lair**
Risk Rating justification	France has implemented a comprehensive system to manage and mitigate potential threats to areas of HCV through a combination of national regulations and conservation programs. Most HCV 1 and 3 areas in France, which include critical habitats for biodiversity and ecosystems of exceptional value, are encompassed by regulated areas such as national parks, nature reserves, Natura 2000 sites, biotope protection orders, and zones managed by the Conservatory of Natural Areas. These areas are protected under stringent national, regional, and departmental laws, ensuring the conservation of both fauna and flora. According to a 2015 study by Bensettiti & Puissauve, 76% of Natura 2000 sites in France have established management plans. However, the study also indicated that pressures on these areas, including changes in hydraulic conditions, pollution, agriculture, and urbanization, have been identified. Monitoring and control systems for Natura 2000 sites are robust, with biotope protection orders and nature reserves being particularly well-managed. Unfortunately, despite the existence of regulations, it remains challenging to adequately identify threats to ecosystems and habitats in agricultural zones. There is therefore a specified risk for this HCV. HCV 4: In France, several regulatory measures govern agriculture to reduce environmental impact. The Écophyto plan, launched in 2008, aims to reduce the use of plant protection products by 50% by 2025, promoting alternative practices. The Nitrates Directive, transposed into French law, imposes restrictions on spreading periods, soil coverage, and strict standards for livestock effluents to protect water from nitrogen pollution. The decree of January 15, 2021, restricts the use of pesticides in sensitive areas such as public parks or schools. Additionally, Regional Action Programs and Enhanced Action Zones around drinking water catchment areas adapt these measures to local specificities to preserve water resources and ecosystems. HCV 5: In France, the protection of drinking water and air quality in the agricultural context relies on regulatory measures and specific projects. Water catchment areas are protected by perimeters defined under the Public Health Code, and the Water Framework Directive sets strict thresholds for nitrates and pesticides. Targeted territorial programs, such as those for catchment feeding areas, promote environmentally friendly agricultural practices. For air quality, ammonia emissions are reduced through good practice guides and AgriQAir project calls supported by ADEME, aimed at testing and disseminating innovative solutions. Chambers of agriculture offer training and raise awareness among farmers to integrate these issues into their activities, thereby strengthening agricultural sustainability. HCV 6 : The protection of cultural values linked to agriculture is based on the recognition of traditional practices, such as transhumance, which is inscribed on UNESCO's Intangible Cultural Heritage list, and the preservation of rural landscapes, notably through Regional Natural Parks and the designation of cultural landscapes like the Causses and the Cévennes. These initiatives,

	supported by public policies and labels from the Ministry of Culture, aim to safeguard agro-pastoral skills, local traditions, and landscapes shaped by agriculture, while promoting the sustainable development of rural areas. In conclusion, France's forest management, agricultural activities and conservation practices, combined with a strong legal and regulatory framework, provide effective protection for HCV areas. The overall risk to HCVs 1, 4, 5, and 6 related to agricultural activities is considered low, as control systems are in place to mitigate any potential threats. However, there is a specified risk for HCV 3.
Risk Rating	Specified Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	**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	• https://www.hcvnetwork.org/library/common-guidance-for-the-identification-of-hcv-english-indonesian-french-portuguese • https://biodiversity.europa.eu/europes-biodiversity/protected-areas/protected-areas-networks • https://www.eea.europa.eu/themes/biodiversity/natura-2000 • • **https://hal.science/hal-03530365/document** • **https://www.eea.europa.eu/themes/biodiversity/natura-2000** • **https://inpn.mnhn.fr/docs/rapportages/Rapport_FR_art17_2015-63.pdf** • **https://hve-asso.com/la-hve/** • **https://agriculture.gouv.fr/planification-ecologique-et-agriculture-le-gouvernement-publie-la-strategie-ecophyto-2030** • **https://www.ecologie.gouv.fr/politiques-publiques/pesticides-pollutions-diffuses** • **https://www.loire-atlantique.gouv.fr/Actions-de-l-Etat/Environnement/Eaux-et-milieux-aquatiques/Eau-et-agriculture/Directive-nitrate2/Directive-nitrate** • **https://agriculture.gouv.fr/pour-une-meilleure-efficacite-du-dispositif-de-protection-des-aires-de-captage-deau-potable** • **https://agriculture.gouv.fr/un-guide-des-bonnes-pratiques-pour-ameliorer-la-qualite-de-lair**
Risk Rating justification	France has established a robust system to protect HCV areas, leveraging national regulations, conservation programs, and international directives. HCV 1 and 3 areas, which include critical biodiversity habitats and exceptional ecosystems, benefit from protections through national parks, nature reserves, Natura 2000 sites, and biotope protection orders. Strong

	legal frameworks and management plans, like those governing 76% of Natura 2000 sites, help mitigate pressures from hydraulic changes, pollution, urbanization, and agriculture. However, challenges persist in addressing threats to ecosystems in agricultural zones. To mitigate risks, France has implemented numerous agricultural regulations for HCV 4 and 5. Measures like the Écophyto plan, the Nitrates Directive, and pesticide restrictions aim to minimize environmental harm, particularly to water and air quality. Localized programs and projects, such as catchment area protections and AgriQAir initiatives, promote sustainable agricultural practices and innovative solutions. HCV 6 is safeguarded through cultural heritage initiatives that preserve traditional practices, rural landscapes, and agro-pastoral skills, emphasizing sustainable rural development. Despite France's comprehensive efforts, including strong legal protections and targeted measures, there remains a specified risk for the agricultural sector concerning HCV 3 due to ongoing pressures in protected areas.
Risk Rating	Specified Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	**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	• https://www.baiedesomme.org/themes/2238-1002-programme-de-maintien-de-l-agriculture-en-zones-humides • https://www.ramsar.org/sites/default/files/documents/library/bn13_agriculture_f.pdf
Risk Rating justification	Many wetlands have been transformed to meet agricultural needs. In Alsace, for example, around 46% of these predominantly wet areas are used for agriculture, primarily comprising wet grasslands and arable lands. While economically motivated, these transformations pose significant challenges for biodiversity conservation. Wetlands play a crucial role in biodiversity, water regulation, and carbon storage, making their preservation especially critical. Peat bogs, a specific type of wetland, are also threatened by unsustainable agricultural practices, particularly drainage for conversion into croplands. These activities increase the risks for these fragile ecosystems, which are known for their unique carbon storage capacity and role in hydrological regulation. Furthermore, permanent grasslands are often converted into croplands, leading to biodiversity loss and disruptions to natural ecosystems. Some wet grasslands are dedicated to livestock and market gardening. It is imperative to prioritize sustainable management of these areas to preserve their ecological functions. French regulations on wetland protection have evolved to better integrate sustainable agricultural practices and to assess the long-term impacts of land

	conversions on these ecosystems. Finding a balance between agricultural needs and the preservation of these areas is essential to support biodiversity and the vital ecological services they provide. However, current regulations do not ensure that agricultural materials are produced on lands that have retained their wetland status since 2008. This is considered a specified risk.
Risk Rating	Specified Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	**Indicator**
2.2.2	Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	**Indicator**
2.2.3	Soil quality in the Supply Base shall be maintained or enhanced
Supply Base Verifiers	• https://biodiversite.gouv.fr/mesure-26-proteger-et-restaurer-nos-sols • https://www.senat.fr/leg/ppl23-066.html • https://agriculture.gouv.fr/prevenir-lerosion-des-sols-pour-proteger-leurs-ressources-et-leur-biodiversite • https://agriculture.gouv.fr/politique-agricole-commune-2023-2027-approbation-du-plan-strategique-national-par-la-commission • https://agriculture.ec.europa.eu/common-agricultural-policy/cap-overview/cap-2023-27/key-policy-objectives-cap-2023-27_fr • https://www.strategie.gouv.fr/sites/strategie.gouv.fr/files/atoms/files/fs-dp-pac-octobre-2019.pdf
Risk Rating justification	France is committed to developing a European strategy dedicated to soil quality, set for 2030. This initiative aims to define a "healthy soil" and includes monitoring and enhancing knowledge on soil biodiversity and geodiversity, as well as developing quality indicators. These efforts are intended to guide sectoral policies to promote sustainable soil management, supporting good agricultural practices and limiting soil sealing. On the legislative front, a proposed French law aims to integrate soil quality into the Environmental Code, recognizing soils as a shared national heritage. It envisions a chapter dedicated to soil health, underscoring their importance in biomass production, biodiversity conservation, and climate regulation,

	among other ecosystem functions. This proposal seeks to establish soil protection and enhancement as legal priorities, including measures for their restoration and development. For erosion prevention, a specific plan is in place to protect soils and their biodiversity. It acknowledges the importance of soil structure and its role in hosting rich biodiversity, and proposes assessments of soil erosion sensitivity along with the adoption of conservation-focused agricultural practices, such as conservation tillage techniques and vegetation cover management. A new soil ecological performance diagnostic tool is planned for 2028 in France. This will allow systematic evaluations, especially during transactions or leases of agricultural, natural, or forest parcels. A High Commissioner for Soil Protection would also be established to oversee these efforts and integrate soil data into regional objectives, ensuring soil productivity and ecological stability. Additionally, the European Union's CAP, implemented by France for the 2023–2027 period, incorporates significant measures for the protection and sustainable management of agricultural soils. The national strategic plan aims to strengthen the resilience of the agricultural sector and encourage the agroecological transition. Key measures include sustainable soil management and reducing dependency on chemicals, promoting agroecology and organic farming with a target of 18% of land under organic cultivation by 2027. The CAP also encourages carbon sequestration and biodiversity, maintaining grasslands and hedgerows and offering bonuses for conserving ecologically important areas. The CAP's eco-scheme, a new instrument, supports climate- and environment-friendly practices, including initiatives to reduce erosion and improve soil health. It also includes measures to enhance risk management related to climate and environment, strengthening farmers' ability to minimize impacts on their farms. These measures reflect a shift towards sustainable, environmentally respectful agricultural practices aligned with the goals of the European Green Deal. The risk related to this indicator is therefore low.
Risk Rating	Low Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	**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	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	**Indicator**

2.2.5	Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.
Supply Base Verifiers	• https://agriculture.gouv.fr/publication-de-larrete-reut-irrigation-relatif-aux-conditions-de-production-et-dutilisation-des • https://www.ecologie.gouv.fr/politiques-publiques/gestion-leau-france • https://www.eaufrance.fr/les-principaux-textes-en-vigueur • https://www.ecologie.gouv.fr/politiques-publiques/protection-ressource-eau • https://agriculture.gouv.fr/la-nouvelle-pac-2023-2027 • https://agriculture.gouv.fr/pac-2023-2027-le-plan-strategique-national
Risk Rating justification	France has taken steps to curb agricultural pollution, with programs like the Nitrates Directive and Nitrate Vulnerable Zones pushing farmers to manage fertilizers more responsibly. These measures have had some success, especially in regions where they've been properly enforced. A 2018 report from the Ministry of Ecological Transition even noted a drop in nitrate concentrations in certain rivers and aquifers. But enforcement is hit-or-miss, and where it's weak, the problems persist. The CAP has played a role too, offering incentives for organic farming, cutting pesticide use, and improving irrigation. Agri-environmental programs have pushed for things like buffer strips along rivers, which help reduce runoff. In some places, collaborative water management projects—bringing farmers and local stakeholders together—have helped balance agricultural needs with ecosystem protection. Pesticide contamination is another problem, with studies showing that over 60% of French rivers contain pesticide residues. In regions like Hauts-de-France and Grand Est, where cereal and beet farming dominates, chemical runoff has polluted major river basins like the Somme and the Meuse. Runoff from fertilizers has also caused eutrophication in lakes and rivers. In northern regions, phosphorus and nitrate runoff have been linked to algal blooms and declining water quality. Meanwhile, excessive water extraction continues to stress water resources, reducing river flows and harming aquatic ecosystems. There are efforts to address these issues (precision farming, agri-environmental measures, and stricter regulations). But widespread reliance on chemical inputs, coupled with uneven enforcement, limits progress. Tackling these challenges will require more than just policy tweaks; it calls for stronger oversight, incentives for sustainable farming, and better-funded local water management programs to balance agricultural productivity with environmental protection. The risk for this indicator is therefore specified.
Risk Rating	Specified Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	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	Air Quality - European Commission EU Air Quality Standards - European Commission Directive (EU) 2015/1480 on Methods of Sampling and Analysis for Air Quality https://agriculture.gouv.fr/un-guide-des-bonnes-pratiques-pour-ameliorer-la-qualite-de-lair https://www.ecologie.gouv.fr/politiques-publiques/agir-reduire-pollution-lair https://agriculture.gouv.fr/la-nouvelle-pac-2023-2027 https://agriculture.ec.europa.eu/common-agricultural-policy/cap-overview/cap-2023-27/key-policy-objectives-cap-2023-27_fr
Risk Rating justification	In France, legislation concerning air protection in the agricultural context is integrated at various regulatory levels, from local to national, and includes European directives. Farmers are subject to strict standards regarding the use of phytosanitary products, with specific restrictions to protect the environment, such as minimum application distances from water sources and inhabited areas. These rules are part of a broader framework defined nationally by the National Plan for the Reduction of Atmospheric Pollutant Emissions, revised in 2017. This plan sets targets in line with annual emission ceilings and air concentration limits established by European directives. It also includes a guide of best agricultural practices aimed at limiting ammonia emissions, a major pollutant from agricultural activities. At the local level, Air Protection Plans play a crucial role, setting objectives and measures to reduce atmospheric pollutant concentrations in large urban areas and high-risk zones. These plans incorporate regulatory and non-regulatory measures implemented by local authorities, illustrating the practical application of national guidelines. In parallel, France adopts a comprehensive approach that includes specific measures, such as the regulation of domestic wood heating. Although not exclusively agricultural, these measures demonstrate the country's commitment to addressing air pollution from all potential sources. For detailed information on these legislations and initiatives, the websites of the Ministries of Agriculture and Ecological Transition, as well as the Chambers of Agriculture, are valuable resources offering practical guides. At the European level, the CAP for the 2023-2027 period includes significant measures for environmental protection, including air quality, in France's agricultural framework. The French National Strategic Plan, developed under this new CAP, aims to enhance environmental sustainability and contribute to climate change mitigation while improving the agricultural sector's competitiveness and resilience. A priority of this plan is to reduce greenhouse gas emissions and improve the management of natural resources such as water and soil. This includes

	initiatives to reduce dependency on chemicals and promote agricultural practices that support biodiversity and air quality. For example, the CAP encourages practices that reduce ammonia emissions, prohibit pesticide spraying in windy conditions, and support afforestation as well as sustainable forest management. Moreover, the budget allocated to these initiatives is substantial, with a significant portion of European funds specifically dedicated to environmental and climate objectives, reflecting the CAP's commitment to a greener, more sustainable agricultural sector. This indicator is determined to be 'low risk'.
Risk Rating	Low Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	**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	• https://environment.ec.europa.eu/law-and-governance/environmental-implementation-review_en • https://sante.gouv.fr/sante-et-environnement/risques-microbiologiques-physiques-et-chimiques/pesticides/article/une-reglementation-stricte-pour-maitriser-les-risques-des-pesticides • https://www.ecologie.gouv.fr/politiques-publiques/pesticides-pollutions-diffuses • https://agriculture.gouv.fr/la-nouvelle-pac-2023-2027 • https://agriculture.gouv.fr/pac-2023-2027-le-plan-strategique-national
Risk Rating justification	In France, legislation governing the use of pesticides in the agricultural sector is strictly regulated and aligns with European directives to ensure both environmental and health safety. This rigorous regulation is evident from the authorization process for each pesticide, which requires approval from Anses for plant protection and biocidal products, and from the National Veterinary Medicine Agency for veterinary antiparasitic products. These authorizations are based on thorough assessments of potential risks to human health and the environment. Building on these assessments, the national Ecophyto II+ plan aims to reduce pesticide use by 50% by 2025, promoting alternative techniques and improving application methods. This plan directly responds to European Directive 2009/128/EC, which encourages member states to minimize pesticide risks and impacts. The adoption of this plan reflects the alignment between national initiatives and EU objectives, highlighting the importance of an integrated approach to pesticide management. To monitor these initiatives, Anses also manages the phytopharmacovigilance system, unique in Europe. This system monitors the adverse effects of plant protection products on the environment and public

	health, from their market introduction to their potential withdrawal. Continuous monitoring is essential for evaluating policy effectiveness and adjusting measures based on results obtained. Furthermore, all plant protection products must comply with strict European regulations, particularly Regulation No 1107/2009, which establishes approval criteria for active substances used in the EU. This regulatory harmonization ensures that all pesticides available on the market contain only active substances previously approved by the European Union, thereby strengthening the safety of agricultural practices. The environmental impact of pesticides is also closely scrutinized, particularly due to their potential to contaminate ecosystems, including freshwater bodies and soils. Monitoring these impacts is crucial to adapting agricultural practices accordingly and minimizing environmental risks, a strategy that aligns with broader efforts to protect public health and the environment. This comprehensive and multidimensional vision is reinforced by the National Strategic Plan developed within the framework of the CAP 2023-2027, which supports agricultural transitions towards more sustainable practices. This plan aims in particular to further reduce pesticide use, aligning national objectives with those of the European Green Deal and the Farm to Fork strategy, which calls for a 50% reduction in the use and risks of chemical pesticides by 2030. The CAP complements these efforts with specific measures to protect natural resources, such as water and soil quality. It also promotes agricultural practices that preserve biodiversity and reduce soil erosion, integrating features like buffer strips along waterways. These initiatives demonstrate France's ongoing commitment to adopting environmentally friendly agricultural practices, while meeting regulatory requirements and societal aspirations for greener agriculture. Given these regulations, the indicator is determined as 'low risk.'
Risk Rating	Low Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	**Indicator**
2.2.8	Waste shall be disposed of in an environmentally appropriate manner.
Supply Base Verifiers	• https://www.legifrance.gouv.fr/jorf/id/JORFARTI000047259911 • **https://pays-de-la-loire.chambres-agriculture.fr/sinformer/etre-agriculteur-lessentiel-a-savoir/gerer-les-dechets-agricoles** • https://hautsdefrance.chambre-agriculture.fr/reglementation/collecte-produits-phytosanitaires-pneus-huile/
Risk Rating justification	In France, the management of agricultural waste, including plastics and tires, is regulated by strict legislation to ensure ecological and effective processing. Agricultural tires, for example, are governed by the extended producer responsibility scheme, which enforces stringent standards for their collection and treatment. It is prohibited to abandon, openly burn, or dispose of these

	tires in natural areas. Consequently, sorting and consolidating operations for this waste are carried out in specific facilities designed to minimize environmental impact. Building on this approach for tires, agricultural plastics are also tightly regulated. Farmers are encouraged to participate in specialized collection systems for the appropriate management and recycling of materials such as silage films and empty phytosanitary product containers. These collections are often organized by eco-organizations like ADIVALOR. Recovered materials can either be recycled or incinerated in energy-recovery facilities, contributing to more sustainable resource management. This management is also economically optimized through an eco-contribution included in the purchase price of products, which often exempts farmers from additional fees for waste disposal. Without such provisions, treatment costs can vary significantly depending on the nature and quality of the waste. Finally, farmers are advised to reduce the amount of waste produced through sustainable management and recovery practices. This approach is essential to comply with strict regulations and promote more environmentally friendly farming. For more detailed information on agricultural waste management in your area or for practical advice, local agricultural chambers remain a valuable resource, offering guides and comprehensive support. This indicator is determined to be 'low risk'.
Risk Rating	Low Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	**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	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	**Indicator**
2.2.10	Harvested areas shall be regenerated
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	**Indicator**

2.2.11	The impacts of natural processes such as fires, pests and diseases shall be managed.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	**Indicator**
2.2.12	Genetically modified trees shall not be used.
Supply Base Verifiers	• https://agriculture.gouv.fr/la-situation-des-ogm-en-france • https://agriculture.gouv.fr/ogm-le-cadre-reglementaire • https://www.ecologie.gouv.fr/politiques-publiques/organismes-genetiquement-modifies-ogm
Risk Rating justification	In France, the management of GMOs in the agricultural context is strictly regulated by national laws and European directives. Since 2008, the commercial cultivation of GMOs has been banned, although the import and sale of certain GMOs and derivative products are permitted under strict conditions of traceability and labeling. This rigorous regulation reflects the country's commitment to maintaining strict control over these controversial technologies. This commitment is also evident at the European level, where authorizations for the marketing of GMOs are granted. Each GMO or derivative product must be clearly labeled to inform consumers of their presence. This labeling requirement, which includes products where the main ingredients are GMO-derived, plays a crucial role in ensuring transparency, though certain highly processed end products, such as refined oils, are excluded unless the GMO threshold exceeds 0.9%. Within the European Union, MON810 corn, which is modified to produce an insecticidal molecule, is the only GMO authorized for cultivation. However, its use remains geographically limited to certain member states that have not requested exclusion. This situation illustrates the diversity of approaches and opinions within the EU regarding GMO cultivation. This indicator is determined to be ‘low risk‘.
Risk Rating	Low Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	**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	https://unfccc.int/process-and-meetings/the-paris-agreement/nationally-determined-contributions-ndcs https://www.i4ce.org/en/publication/carbon-sinks-is-france-ambition-realistic-climate/
Risk Rating justification	Route A: France is a party to the Paris Agreement and has submitted its Nationally Determined Contribution (NDC) to the United Nations Framework Convention on Climate Change (UNFCCC). France's NDC encompasses various sectors, including carbon emissions and removals from agriculture, forestry, and land use. Under the Paris Agreement, France is committed to reducing greenhouse gas emissions. This commitment includes accounting for changes in carbon stock associated with biomass harvests, ensuring that such changes are considered in the country's efforts to mitigate climate change. As a signatory to the Paris Agreement, France is expected to regularly update and enhance its NDC to reflect its ongoing efforts to combat climate change and meet the goals set forth in the agreement.
Risk Rating	Low Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	**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	N//A
Risk Rating justification	N/A
Risk Rating	Low Risk

France Hauts-de-France, Grand Est,	**Indicator**

Bourgogne-Fr.-Comté	
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	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	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	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	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	N/A
Risk Rating justification	N/A
Risk Rating	Specified Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	Indicator
4.1.1	Freedom of association and the right to collective bargaining shall be respected in the workplace.
Supply Base Verifiers	Online data analysis International data sources FSC-NRA-FR V1-0 EN https://www.ituc-csi.org/IMG/pdf/ituc_globalrightsindex_2020_en.pdf http://www.ilo.org
Risk Rating justification	France has fully adopted all eight of the primary ILO Conventions, which are currently active and enforced. Within the context of this report, France is referenced 41 times, mainly concerning minor discrimination issues related to

	gender, migrants, the elderly, and disabled individuals. However, there are no significant concerns about child or forced labor. Regarding forced labor, while several European documents address the issue, none specifically associate France or its forestry sector with particular risks. France is also not highlighted on the ILO Child Labour Country Dashboard, indicating a minimal risk of child labor in the country. The report does mention issues involving children from Eastern Europe and West Africa, notably Romania, who are involved in theft, begging, and prostitution in France. Some of these children are trafficked, while others become entangled in trafficking networks after arriving voluntarily. The French government is working actively with countries like Romania to protect and repatriate these children, showing evidence of effective collaboration between French and Romanian police forces. There are no significant instances of child labor or trafficking beyond these cases. Additionally, no substantial labor rights violations have been reported in France. Since a 2003 review by the Committee on the Elimination of Discrimination against Women, France has actively promoted women's rights and gender equality, in line with the Convention on the Elimination of All Forms of Discrimination against Women. A 2014 submission to the UN Human Rights Committee on France does not cite any labor rights infringements. The country is also ranked as 'low risk' on the 2014 Child Labour Index. Although rare, instances of forced labor and discrimination can occur, but France's efforts in addressing these issues through regulatory measures are acknowledged by the Joseph Rowntree Foundation. The French forestry sector does not exhibit significant labor rights violations. French labor law is stringent and aligns with European and international standards, emphasizing employment contracts and laws against child labor, as overseen by the State Labour Inspectorate. The ILO website provides a comprehensive overview of French regulations concerning child labor and child protection. This evaluation assumes effective law enforcement, leading to the conclusion that there is a low risk of labor rights violations in France. This includes adherence to social rights legislation, the maintenance of freedom of association and collective bargaining, and the absence of forced labor and discrimination in employment. While widespread child labor is not evident, isolated incidents related to forced prostitution are noted. France’s commitment to relevant ILO Conventions and the limited scope of minor labor rights violations further reinforce this low-risk assessment. However, it is observed that not all groups, particularly the Roma minority, may feel fully protected under these rights. This indicator is determined to be ‘low risk‘.
Risk Rating	Low Risk

France **Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté**	**Indicator**

4.1.2	Forced or compulsory labour shall not be used.
Supply Base Verifiers	• https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000023946779#:~:text=la%20traite%20...-,Directive%202011%2F36%2FUE%20du%20Parlement%20europ%C3%A9en%20et%20du%20Conseil,2002%2F629%2FJAI%20du%20Conseil • https://normlex.ilo.org/dyn/normlex/fr/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C029 • https://www.coe.int/fr/web/compass/the-european-convention-on-human-rights-and-its-protocols • **http://www.ilo.org**
Risk Rating justification	In France, the legislative framework against forced labor is based on several legal texts, international conventions, and European directives aimed at protecting workers' rights and penalizing acts of exploitation. The French Labor Code explicitly prohibits forced labor. Article L. 8221-5 defines the components of this offense and working conditions deemed incompatible with human dignity. Violators face criminal penalties ranging from heavy fines to prison sentences, depending on the severity of the offense, especially in cases of exploitation of vulnerable individuals. In addition, the Penal Code reinforces this prohibition with articles specifically targeting exploitation through labor. For example, Article 225-13 penalizes forced labor as well as working conditions that infringe on human dignity, which may include human trafficking situations. Article 225-14 also specifies sanctions related to subjecting people to degrading working or housing conditions. These offenses are punishable by up to 10 years in prison and substantial fines, particularly when minors are involved. Regarding corporate responsibility, the Duty of Vigilance law requires large companies to establish preventive measures to avoid forced labor within their supply chain. Companies employing more than 5,000 employees in France or more than 10,000 internationally must implement a vigilance plan to prevent human rights abuses, including forced labor, among their subcontractors. In cases of non-compliance, victims may hold companies accountable in court. France is also a signatory to several ILO conventions, including Conventions No. 29 and No. 105, which prohibit forced labor in all forms. Additionally, Article 4 of the European Convention on Human Rights, incorporated into French law, prohibits slavery, servitude, and forced labor. The European Court of Human Rights can be petitioned by victims who believe that the state has failed in its protective obligations. The European Directive 2011/36/EU represents an additional pillar in this struggle by integrating a European dimension into the protection of victims of trafficking and forced labor. It requires EU member states, including France, to establish sanctions and protective measures for victims. French and European courts have reinforced this framework through several judicial decisions condemning cases of forced labor, often based on human trafficking or undeclared work offenses. These decisions demonstrate the

	strict application of these laws and conventions. These laws and legal mechanisms are not isolated. In fact, France has adopted the eight main ILO Conventions, underscoring its commitment to combating violations of workers' rights. International reports on the French labor rights situation, though sometimes noting minor concerns related to gender, migration, or minorities, do not indicate major risks of forced labor or child labor. Moreover, although incidents of forced labor are observed in certain sectors, French legislation is stringent, with a framework that adheres to European and international standards. Consequently, France is classified as a low-risk country for labor rights violations, notably concerning child labor, freedom of association, and protection against discrimination. This indicator is determined to be 'low risk'.
Risk Rating	Low Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	**Indicator**
4.1.3	Child labour shall not be used.
Supply Base Verifiers	• **https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000023946779#:~:text=la%20traite%20...-,Directive%202011%2F36%2FUE%20du%20Parlement%20europ%C3%A9en%20et%20du%20Conseil,2002%2F629%2FJAI%20du%20Conseil** • **https://normlex.ilo.org/dyn/normlex/fr/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C029** • **https://www.coe.int/fr/web/compass/the-european-convention-on-human-rights-and-its-protocols** • **http://www.ilo.org**
Risk Rating justification	France has fully adopted all eight of the primary ILO Conventions, which are currently active and enforced. The report references France 41 times, mainly regarding minor discrimination issues related to gender, migrants, the elderly, and disabled individuals, but there are no significant concerns reported about child or forced labor. In terms of forced labor, several European documents discuss the issue, but none specifically link France or its forestry sector to any particular risk. France is also not highlighted on the ILO Child Labour Country Dashboard, indicating a minimal risk of child labor in the country. Reports do mention issues related to children from Eastern Europe and West Africa, particularly Romania, who are involved in theft, begging, and prostitution in France. Some of these children are trafficked, while others are caught up in trafficking networks voluntarily. The French government is

	actively working with countries like Romania to protect and repatriate these children, demonstrating effective collaboration between French and Romanian police forces. However, the reports do not indicate significant instances of child labor or trafficking beyond these points. France has made considerable efforts to promote women's rights and gender equality, in alignment with the Convention on the Elimination of All Forms of Discrimination against Women, since a 2003 review by the Committee on the Elimination of Discrimination against Women. A 2014 submission to the UN Human Rights Committee on France does not cite any labor rights infringements, and the country ranks as 'low risk' on the 2014 Child Labour Index. While instances of forced labor and discrimination, though rare, can occur, France's regulatory measures effectively address these issues. The French agricultural sector does not show significant labor rights violations. French labor law is stringent, aligning with European and international standards, and emphasizes contracts for employment, laws against child labor, and protection of minors, as overseen by the State Labour Inspectorate. The ILO website provides a comprehensive overview of French regulations concerning child labor and child protection. This evaluation assumes effective law enforcement and concludes that there is a low risk in France regarding labor rights violations. This includes adherence to social rights legislation, maintenance of freedom of association and collective bargaining, and absence of forced labor and discrimination in employment. While there are isolated incidents related to forced prostitution, there is no widespread child labor. France's commitment to ILO Conventions and the limited scope of minor labor rights violations reinforce this low-risk assessment. However, it is noted that some groups, particularly the Roma minority, might feel inadequately protected under these rights. This indicator is determined to be 'low risk'.
Risk Rating	Low Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	**Indicator**
4.1.4	Workers shall not be discriminated in hiring, remuneration, access to training, promotion, termination or retirement.
Supply Base Verifiers	• https://oxfamilibrary.openrepository.com/bitstream/handle/10546/621604/rr-essential-but-invisible-and-exploited-050624-en.pdf;jsessionid=AD43DF772A5A8F667C40A850F567A04F?sequence=24 • https://agriculture.gouv.fr/emploi-et-conditions-de-travail • https://www.legifrance.gouv.fr/conv_coll/id/KALICONT000043036630 • https://agriculture.gouv.fr/la-retraite-de-base-des-salaries-agricoles

Risk Rating justification	Hiring in the agricultural sector is regulated by national laws and collective agreements specific to this field. Employers must adhere to rules regarding different types of contracts (permanent, fixed-term, and temporary contracts), which detail aspects such as probation periods, the rights of seasonal workers, and specific conditions for recruiting temporary foreign workers (a common practice in this sector). For seasonal workers, special provisions are in place, particularly in harvesting activities. Seasonal fixed-term contracts offer flexibility tailored to the sector's needs while ensuring certain rights for the employees concerned. Regarding compensation, the agricultural sector is subject to the agricultural minimum wage, with possible adjustments through local collective agreements or branch agreements covering various specialties, such as market gardening or viticulture. These agreements set specific wage scales based on employees' skill levels and seniority. Furthermore, a system of social charge exemptions on overtime is intended to encourage seasonal labor, thus meeting the sector's specific needs. Agricultural employees also have access to continuous professional training, managed by OCAPIAT (Opérateur des compétences de l'Agriculture, de la Pêche, des Industries Agroalimentaires et des Territoires), and training funds from the agri-food sector. The Personal Training Account allows them to pursue qualifying training. Additionally, employers are responsible for offering training as part of the skills development plan, contributing to the professional advancement of their employees. To promote internal mobility and advancement, collective agreements in the sector often define criteria based on experience, qualifications, and ongoing training. These criteria may be established by company or branch agreements, enabling employees to progress within their career path on the farm. The dismissal of agricultural workers generally follows labor law, with adjustments for seasonal jobs. A real and serious cause, such as an economic, disciplinary, or fitness-related reason, is required to justify a dismissal. Seasonal contracts naturally conclude at the end of the season, but in cases of early termination, standard dismissal rules apply. For larger farms laying off workers for economic reasons, implementing an employment protection plan may be necessary. Finally, the retirement system for agricultural workers is managed by the Mutualité Sociale Agricole, which provides benefits tailored to the sector's characteristics. Retirement contributions are separate from other sectors and include specific arrangements for small farms and family-run operations. In addition to the basic pension, agricultural workers benefit from a mandatory supplementary pension, also managed by the Mutualité Sociale Agricole. In certain cases, workers who have held strenuous or hazardous jobs may be

	eligible for early retirement, offering a smoother transition to the end of their career. Migrant agricultural workers in France often face precarious conditions, including low wages, long working hours, poor housing, and limited access to social protections. These challenges are exacerbated by irregular employment contracts, lack of legal documentation, and insufficient enforcement of labor laws. Exploitation remains prevalent, with many workers subjected to substandard living and working conditions. Seasonal roles, particularly in harvesting, heavily depend on migrant labor, which can heighten these vulnerabilities. In northern regions such as Hauts-de-France, Grand Est, and Bourgogne-Franche-Comté, agriculture remains an important sector that employs migrant workers, particularly for labor-intensive activities. While these areas are less publicized than southern France in terms of labor rights issues, similar challenges of inadequate protections and exploitation can persist. These problems are highlighted in Oxfam reports, which underscore the difficulties faced by seasonal agricultural workers across the country, particularly those in insecure employment situations. Considering these factors, we can conclude that the risk of employing migrant workers under inappropriate working conditions, even for energy purposes in the northern regions of France, is significant.
Risk Rating	Specified Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	**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	• https://www.weforum.org/publications/global-gender-gap-report-2014/ • Organisation internationale du Travail (OIT) • https://www.legifrance.gouv.fr/loda/id/JORFTEXT000048604676/2024-04-05/ • **https://hauts-de-france.dreets.gouv.fr/Salaires-dans-les-exploitations-agricoles-et-les-CUMA** • **https://www.salaire-minimum.com/salaires/bareme-salaires-production-agricole-cuma-2024**
Risk Rating justification	In France, the minimum wage for agricultural sector workers is generally aligned with the SMIC (minimum interprofessional growth wage), though variations may exist depending on collective agreements and amendments specific to each region or branch within the sector. For instance, the collective agreements for agricultural production and CUMA (agricultural equipment

	usage cooperatives) set minimum wage scales according to professional categories, periodically adjusted to keep up with changes in the SMIC and inflation. As of January 1, 2024, a decree has set the SMIC at €11.52 gross per hour for metropolitan workers, a rate also applicable to agricultural workers, although regional or branch-specific adjustments may sometimes introduce increases. Additionally, amendments extended by decrees in February and May 2024 specify minimum wages based on qualifications and categories for various types of operations, including agricultural service companies and vineyards and forestry operations in metropolitan France. Compliance with this minimum wage in the agricultural sector is under continuous monitoring, particularly due to the regular increases in the SMIC, which can exceed the wage levels set by some collective agreements within certain branches. Although the law requires agricultural employers to ensure at least the SMIC in cases of discrepancies with conventional wages, some branches face difficulties in adapting, especially due to frequent adjustments for inflation and the financial constraints of small farms. In cases of non-compliance with the conventional wage scales, sanctions are provided, and employees can claim wage arrears over a period of five years. The State has also implemented initiatives to reinforce inspections to encourage agricultural branches and other sectors, where conventional wages may fall below the SMIC, to accelerate negotiations and adjust their wage scales accordingly. These efforts aim to ensure that all agricultural workers receive wages at least equal to the SMIC, particularly following recent public interventions at the start of 2024 highlighting the need to raise minimums in certain branches, notably agriculture, to attract and retain workers in these essential sectors. Collective agreements, such as that of agricultural production and CUMA, regularly update minimum wages to keep pace with the SMIC, although this compliance may sometimes be hindered by operational challenges specific to the agricultural sector. The structured French Labor Code is rigorously enforced by the Labor Inspectorate, which is responsible for ensuring compliance with laws within companies. Although cases of fraud, particularly concerning URSSAF, do exist, they remain relatively minor. The Labor Inspectorate conducts thorough inspections, especially in high-risk sectors like construction and agriculture, and publishes annual reports detailing its findings. According to the latest report from 2012, the agricultural sector does not present major issues concerning labor law violations compared to other areas, suggesting that compliance measures are generally well respected. This indicator is determined to be ‘low risk‘.
Risk Rating	Low Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	**Indicator**
4.1.6	Working hours shall comply with legal requirements.

Supply Base Verifiers	https://legifrance.gouv.fr/codes/id/LEGIARTI000006417754/ https://travail-emploi.gouv.fr https://cgedd.developpement-durable.gouv.fr/publications/r25913
Risk Rating justification	In France, the risk of a company failing to comply with legal working hour regulations is significantly minimized due to a rigorous regulatory framework and effective oversight. The French Labor Code establishes clear and strict rules regarding legal working hours, overtime, and rest periods. Employers' obligations concerning working time are outlined to ensure worker protection and prevent exploitation. One of the main guarantees of compliance is the role of the Labor Inspectorate. This public body, under the Ministry of Labor, is tasked with ensuring adherence to labor laws in France. The Labor Inspectorate conducts regular inspections across various sectors, including forestry, and publishes annual reports detailing the inspections carried out and violations found. These reports indicate that infractions are often minor and that corrective measures are typically effective. For example, recent data shows that violations of working hour regulations are rare and are usually addressed with rigor by the authorities. Additionally, the French legal system imposes severe penalties on companies that fail to adhere to working hour regulations. The fines and penalties for such violations can be substantial, which strongly motivates companies to comply with legal requirements. Judicial recourse also allows employees to report any infractions, further strengthening the oversight and correction mechanisms. In summary, the combination of stringent legislation, proactive oversight by the Labor Inspectorate, and deterrent penalties creates an effective system for ensuring compliance with working hour laws in France. This robust regulatory framework and the vigilance of competent authorities ensure that the risks for a French company not complying with legal working hour regulations are minimal.
Risk Rating	Low Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	**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	• https://agriculture.gouv.fr/telecharger/98396 • https://agriculture.gouv.fr/les-services-de-sante-au-travail-en-agriculture • **https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000048680967**
Risk Rating justification	In France, the legislative provisions for healthcare for agricultural workers are specific and tailored to the particularities of this sector. The Mutualité Sociale

	Agricole is the main entity responsible for health and welfare coverage. It manages an agricultural occupational health system, ensuring medical monitoring for approximately 1.16 million employees, including many seasonal workers, through a network of local sections and a specialized association to coordinate preventive care. These services include workplace safety and information campaigns on occupational risks, adapted to small agricultural businesses and short-term seasonal contracts. For seasonal workers, the pre-employment medical examination is often replaced by preventive measures, although individual exams are available outside work periods for those who wish. Regarding supplementary health and welfare coverage, a minimum level is mandatory for employees, including guarantees in case of death, disability, or permanent incapacity. Since a national agreement in 2008, reinforced by an amendment in 2015, agricultural employers are required to cover at least 50% of the premiums associated with these contracts, while employees can choose additional options at their own expense. These provisions ensure financial security for employees against workplace accidents or occupational illnesses. The legislation also includes specific departmental schemes, such as in Deux-Sèvres and Vienne, where local agreements have established mandatory supplementary schemes for certain non-executive employees, highlighting the importance of local adaptation in the agricultural sector. This indicator is determined to be 'low risk'.
Risk Rating	Low Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	**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	• **French Labor Code (Code du Travail) - Article L6313-1** • https://agriculture.gouv.fr/telecharger/142643 • https://agriculture.gouv.fr/les-formations-et-diplomes-de-lenseignement-agricole • https://www.legifrance.gouv.fr/codes/section_lc/LEGITEXT000006071367/LEGISCTA000006121433/ • **https://chambres-agriculture.fr/actualites/toutes-les-actualites/detail-de-lactualite/actualites/former-les-agriculteurs-et-les-conseillers/** • https://travail-emploi.gouv.fr/la-formation-professionnelle-principes-generaux
Risk Rating justification	In France, training in the agricultural sector is governed by a set of legislative provisions that support ecological transition, innovation, and generational renewal. The Rural and Maritime Fishing Code, notably in Book VIII, defines

	the legal frameworks for agricultural education and training, integrating goals of economic, social, environmental, and health performance. These objectives are realized through institutions and training programs focused on themes like agroecology and cooperative models, while also contributing to food security and territorial sustainability. Recent reforms, illustrated by the 2024 Agricultural Orientation Bill, have strengthened this legislative framework by introducing specific measures for training. Among these measures are initiatives to raise awareness among young people about agricultural professions, such as orientation and discovery programs, as well as the creation of a "France Agriculture Services Network" to support project initiators in their installation and training procedures. In parallel, additional funding and resources are allocated in 2024 to support continuous training, particularly in agroecological transition and sustainable practices, ensuring access to diversified training through school-based, apprenticeship, and continuous education pathways. Future farmers and advisors can thus specialize in areas such as crop production, water management, and health safety. Training in the agricultural sector aims not only to support professionals in adapting to modernization challenges, ecological transition, and food security but also to facilitate the installation and renewal of generations. To benefit from installation aid, such as the Young Farmers Grant, a minimum level IV agricultural diploma (such as the BPREA or an agricultural vocational baccalaureate) is required, as well as the completion of a Personalized Professionalization Plan. This plan, coordinated by agricultural chambers, allows for the assessment of the installer's skills and identification of necessary training to optimize their chances of success. Continuous training is an essential pillar for farmers and their advisors, with an evolving offering that takes into account technological, economic, and ecological issues. For example, agricultural chambers offer modules in agroecology, water management, and farm system optimization, largely funded by the VIVEA fund for sector workers. These training sessions can be held in person or remotely, to accommodate professionals' time constraints. Apprenticeship is also a preferred access route for young people and adults in career transitions, allowing them to combine company work with center-based training to obtain an agricultural diploma. This apprenticeship arrangement is structured around a contract that includes at least 25% theoretical training, registered in the National Directory of Professional Certifications. All of these provisions ensure that agricultural sector professionals have skills adapted to the evolving nature of the field, while fostering the transmission of agricultural know-how in line with current environmental challenges. Regions and departments also provide support by offering specific aid to facilitate access to necessary training and financing. For more information, resources available through agricultural chambers and the Ministry of Labor present details on continuous training obligations and options for professionals in the agricultural sector. This indicator is determined to be 'low risk'.
Risk Rating	Low Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	Indicator
4.1.9	Mechanisms shall be in place for resolving grievances and disputes in the workplace.
Supply Base Verifiers	• https://www.legifrance.gouv.fr/loda/id/JORFTEXT000037547946/2024-03-05/ • **https://www.assemblee-nationale.fr/dyn/15/rapports/cion-eco/l15b1981_rapport-information** • **https://agriculture.gouv.fr/le-mediateur-des-relations-commerciales-agricoles**
Risk Rating justification	In France, legislation offers several tools for conflict resolution in the agricultural sector, notably through the 2018 EGALIM law, which introduced measures to balance commercial relationships between producers, distributors, and processors. This law promotes price transparency in negotiations and aims to strengthen producer organizations, thereby reducing power imbalances and preventing potential conflicts through fairer compensation for farmers. The law also mandates written contracts to secure agricultural transactions, including clear criteria for setting prices, often based on actual production costs, and regulates loss-leading sales to protect producers from abusive practices by large retailers. Another key player in conflict resolution is the Agricultural Trade Relations Mediator, a free, confidential, and rapid system established to facilitate amicable dispute resolution. The mediator intervenes in conflicts between suppliers and distributors, promoting dialogue and guiding parties toward negotiated solutions, with a success rate of over 75%. This process differs from conciliation in that the mediator does not directly propose solutions but fosters exchanges between the parties so they can reach an agreement themselves. These legislative measures and mediation mechanisms help reduce tensions in the agricultural sector, where conflicts arise not only over prices but also environmental and neighborhood issues, such as methanization, biodiversity, and even nuisances related to local agricultural practices. This indicator is determined to be ‘low risk‘ for France.
Risk Rating	Low Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	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	• travail-emploi.gouv.fr

	• http://legifrance.gouv.fr • http://ameli.fr • http://carsat.fr
Risk Rating justification	In France, strict regulations are in place to protect workers' health and safety, especially regarding the development, communication, and implementation of workplace policies and procedures. France, as a member state of the ILO, has ratified most of the major ILO conventions related to occupational safety and health. The French Ministry of Labour, Employment, and Economic Inclusion oversees health and safety regulations in the workplace. The Ministry, along with the Directorate General for Labour, is responsible for ensuring the implementation and compliance with the Labour Code, particularly regarding worker health and safety. The French Labour Code sets out mandatory provisions for employers to prevent occupational hazards. It includes requirements for risk assessments, safety training, protective measures, and annual reports. Inspections are conducted by the "Inspection du travail", which has the authority to issue penalties in case of non-compliance. These inspectors may perform surprise visits, similar to the Belgian system, and enforce corrective measures where necessary. Workers in France also have the right to refuse work if they believe it presents a serious and imminent danger to their health and safety. The employer cannot penalize employees for exercising this right, ensuring worker protection. Employers in France are obligated to train their employees on safety measures, particularly when it comes to handling hazardous equipment or tasks. For certain high-risk professions, such as agriculture, specific training certifications are required. Annual safety reports and accident documentation are mandatory, and employers must establish a plan for the prevention of workplace risks. Preventive measures in France are in line with Belgium's, as outlined in the French Labour Code, which emphasizes accident prevention, health surveillance, and the humanization of labour conditions. In case of non-compliance, French authorities can levy fines or impose corrective measures. Data collection on workplace accidents is managed by the Social Security system and institutions like the Caisse Nationale d'Assurance Maladie. There are also sector-specific organizations, such as CARSAT, that monitor and report on workplace health and safety. This indicator is determined to be ‘low risk‘.
Risk Rating	Low Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	**Indicator**

4.2.1	Negative social and community impacts shall be identified and avoided.
Supply Base Verifiers	http://legifrance.gouv.fr http://debatpublic.fr **http://ilo.org**
Risk Rating justification	In France, there is a comprehensive legal framework and a range of policies aimed at identifying and avoiding negative social and community impacts related to various economic activities, including forestry, agriculture, and industrial operations. The country places a strong emphasis on public consultation, environmental assessment, and social impact analysis to minimize adverse effects on communities. The French Environmental Code requires that any project or activity likely to have significant effects on the environment, including social aspects, must undergo an Environmental Impact Assessment (EIA). This assessment includes identifying potential negative impacts on local communities, such as noise pollution, air and water quality degradation, and the displacement of populations or businesses. The EIA process involves public participation, allowing local communities to voice their concerns and provide input on proposed projects. By integrating these considerations early in the planning process, the risk of negative social and community impacts is significantly reduced. Moreover, France has established robust frameworks for public consultation and participation, particularly through the Public Debate Commission (Commission Nationale du Débat Public, CNDP), which ensures that local communities are involved in decision-making processes for projects that may affect them. The CNDP organizes public debates and consultations for projects of national significance, which helps in identifying potential social risks and addressing them proactively. At a more localized level, Local Urban Planning Documents include social impact assessments that consider the needs and potential impacts on local communities. These documents are developed with community involvement and provide a basis for sustainable land-use planning that avoids or mitigates negative social consequences. Labor laws in France also play a critical role in avoiding negative social impacts, especially in industries like forestry and agriculture. The French Labour Code ensures worker rights and safety, mandates fair wages, and upholds social protections such as health insurance, unemployment benefits, and pensions. These laws help prevent exploitation and promote fair working conditions, which in turn minimizes the social risks associated with labor practices. France also adheres to several international agreements that support the identification and avoidance of negative social impacts. For example, it complies with the ILO Conventions on labor rights, non-discrimination, and occupational health and safety, further contributing to social well-being. Through these comprehensive legal frameworks, public participation processes, and adherence to international standards, France ensures that potential negative social and community impacts are thoroughly identified, assessed, and mitigated, contributing to a low-risk environment for social and

	community well-being.
Risk Rating	Low Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	**Indicator**
4.2.2	Feedstock sourcing shall positively contribute to the local economy, including employment.
Supply Base Verifiers	• http://legifrance.gouv.fr • http://ilo.org/global/lang--en/index.htm • http://agriculture.gouv.fr
Risk Rating justification	France's approach to agricultural raw material supply is well-regulated and structured, contributing positively to the local economy, particularly in terms of employment. The French agricultural sector exemplifies how raw material supply can support local economies. It employs a significant number of people in various roles, ranging from farm management and land cultivation to logistics and product processing. The sector is governed by a framework that promotes sustainable practices, ensuring that agricultural resources are managed in a way that supports long-term economic benefits. The French Labor Code and the Rural and Maritime Fishing Code set strict requirements regarding employment, worker safety, and sustainable management practices. Local communities benefit economically from these regulations, which promote fair employment conditions, including access to healthcare, retirement benefits, and compensation for work-related accidents. These provisions ensure that employment in the agricultural sector is not only accessible but also safe and beneficial for workers and their families. By focusing on sustainable practices, the agricultural sector in France helps stabilize local economies, creating jobs that contribute to both economic and social well-being. Moreover, the French government offers incentives and support for sustainable farm management, which in turn supports local businesses involved in the agricultural supply chain. The emphasis on local sourcing and processing strengthens the positive impact on the local economy by ensuring that value-added activities remain within the region. This approach aligns with France's broader commitment to social rights and sustainable development, reinforcing the country's compliance with international labor standards, such as those established by the ILO. In summary, the supply of agricultural raw materials in France contributes positively to the local economy by offering employment opportunities under fair conditions, ensuring sustainable management of agricultural resources, and promoting local processing and business development activities. This comprehensive framework helps mitigate risks related to labor exploitation and ensures that the economic benefits of agricultural supply extend to local communities.

	This indicator is determined to be ‘low risk‘.
Risk Rating	Low Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	**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	http://legifrance.gouv.fr http://ec.europa.eu/environment/nature/natura2000/index_en.htm http://ec.europa.eu/info/food-farming-fisheries/key-policies/common-agricultural-policy_en
Risk Rating justification	In France, the maintenance and enhancement of food, water supply, and HCV that are essential for the fulfillment of basic community needs are well-regulated and prioritized within national policies. France's legislative framework and environmental management practices are designed to safeguard these essential resources, ensuring that they remain available and sustainable for local communities. The French Environmental Code provides robust protections for natural resources, including water and biodiversity, which are vital for community well-being. The code outlines strict regulations on the management and use of natural resources to prevent degradation, overuse, and pollution. Water resources, for instance, are managed under a comprehensive legal framework that mandates sustainable water management practices, protection against pollution, and ensures equitable access to clean water for all communities. Local water management plans, called Schémas d'Aménagement et de Gestion des Eaux, are developed to balance the needs of different users while protecting the resource itself. Additionally, France has identified and protected various HCV areas, which are crucial for biodiversity and the provision of ecosystem services, such as clean air, water, and fertile soil. Forest areas classified under Natura 2000, a network of protected areas established under the European Union's Birds and Habitats Directives, are managed to maintain biodiversity and protect critical habitats. These sites are managed to ensure that the needs of local communities are not compromised while also conserving important natural habitats. For food supply, the French agricultural sector is heavily regulated to ensure sustainability, food security, and environmental protection. Agricultural practices in France are governed by both national legislation and European Union policies, which focus on minimizing environmental impact, protecting water resources, and promoting sustainable land use. The CAP under the EU framework supports practices that enhance food production while maintaining ecological balance, protecting water resources, and ensuring the well-being of local communities. Through these frameworks, France demonstrates a commitment to maintaining and enhancing food and water supplies and protecting HCVs

	essential for community needs. These measures reduce the risk of environmental degradation that could harm local communities and contribute to sustainable development goals.
Risk Rating	Low Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	**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	• http://legifrance.gouv.fr/codes/id/LEGITEXT000006071514/ • http://legifrance.gouv.fr/codes/id/LEGITEXT000006074220/ • **http://service-public.fr/particuliers/vosdroits/F1926**
Risk Rating justification	In France, the Forest and Environment Codes comprehensively regulate legal, customary, and traditional tenure and use rights related to forest areas. These rights often pertain to activities like grazing and firewood collection. Grazing rights, particularly in state-owned forests, are carefully managed, with limits set on the number of animals based on the entitlements of the rights holders. Local authorities, such as the mayor, publicly announce the names of individuals who hold these rights to ensure transparency and proper governance. To maintain these rights, they must be actively exercised; otherwise, they risk being forfeited. However, if rights are lost despite proper usage, the affected individuals can seek compensation through legal avenues. Any activities that could affect forested land or the rights associated with it, such as trading or leasing, necessitate consultations with unions or councils to safeguard the interests of the rights holders. Grazing sheep and goats specifically requires special permissions, reflecting the careful regulation of forest use. Private forest owners have the legal authority to clear their lands of any timber usage rights and are also responsible for designating the routes that animals may use to access grazing areas. For firewood and construction needs, individuals with use rights cannot personally cut the wood; it must be sourced from a designated forestry company, and the wood provided cannot be sold or traded by the rights holder. This prevents exploitation and ensures sustainable use. Disputes over such tenure and use rights can lead to compensation claims and are typically resolved through the administrative court system, which provides a formal mechanism for conflict resolution. Additionally, private forest owners are legally empowered to deny usage rights to their forests, significantly reducing the likelihood of grazing rights violations. This well-regulated framework ensures that legal, customary, and traditional tenure and use rights in France are clearly identified, documented, and respected, thereby maintaining a low-risk status regarding the violation of these rights.
Risk Rating	Low Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	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	• https://www.legifrance.gouv.fr/codes/id/LEGITEXT000025244092 • https://www.onf.fr/onf/accueil/gestion-durable • https://www.defenseurdesdroits.fr/fr/saisir • https://www.justice.gouv.fr/organisation-judiciaire • https://www.travail-emploi.gouv.fr/dialogue-social/mediation
Risk Rating justification	In France, mechanisms are in place to effectively handle grievances and disputes related to tenure and the use of forests or other land management practices. France has a comprehensive legal framework governing land ownership and forest management. The French Forest Code regulates both public and private forest management. Forest management plans for publicly owned forests must be approved by the Office National des Forêts and involve stakeholder input, including public consultation. For resolving conflicts related to land use and forest management, France encourages several alternative dispute resolution methods: - Mediation: Independent mediators are available to help parties reach amicable settlements, particularly in disputes involving land use or employment. - Labor Unions: In employment-related disputes, labor unions play a key role in negotiations, especially within the forestry sector. - Ombudsman Services: The national ombudsman addresses grievances involving government entities and ensures that citizens' rights are protected in disputes related to land or forest management. When disputes require formal judicial intervention, France's judicial system offers a fair and efficient resolution process. Administrative courts, civil courts, and specialized environmental courts handle cases depending on their nature. France maintains high standards of governance and low levels of corruption, contributing to an effective legal environment. Public consultation is an integral part of the forest management process in France. Before approving significant forestry projects, there are opportunities for stakeholders, including environmental groups and local communities, to provide input and express concerns. Overall, France has established effective mechanisms for managing and resolving disputes related to land tenure and forest use, supported by a robust legal framework and various alternative dispute resolution methods.
Risk Rating	Low Risk

France	Indicator

Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	
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	http://legifrance.gouv.fr http://debatpublic.fr http://unece.org
Risk Rating justification	In France, while the specific concept of Free, Prior, and Informed Consent (FPIC) as applied to Indigenous Peoples may not directly translate due to the absence of formally recognized Indigenous communities, the country has established robust frameworks for consultation and participation. The French Environmental Code requires Environmental Impact Assessments (EIAs) for projects that could significantly affect local communities, including customary or traditional land users. This process ensures that affected parties are consulted and their views are considered before project approval. Additionally, France adheres to the principles of the Aarhus Convention, which promotes public participation in environmental decision-making. The Public Debate Commission (CNDP) further facilitates this consultation process for major projects, ensuring that local communities have a platform to raise concerns and influence outcomes. Although FPIC is not explicitly mandated in French law, these mechanisms ensure that communities potentially impacted by projects are adequately consulted and that their concerns are addressed, aligning with the spirit of FPIC by promoting transparency and engagement.
Risk Rating	Low Risk

France Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté	Indicator
4.2.7	Designated cultural heritage sites shall be preserved.
Supply Base Verifiers	• http://legifrance.gouv.fr • htpp://culture.gouv.fr • htpp://patrimoine.fr
Risk Rating justification	In France, the protection of designated cultural heritage sites is strongly enforced through comprehensive legislation and regulatory frameworks. The French Heritage Code (Code du Patrimoine) establishes strict guidelines for the conservation and preservation of cultural heritage sites, including monuments, historical buildings, and archaeological sites. This code mandates that any modifications or developments affecting these sites must receive prior approval from the relevant heritage authorities to ensure that their historical and cultural values are maintained. Additionally, the French government actively supports the preservation of cultural heritage through various agencies, such as the National Heritage

	Institute (Institut National du Patrimoine), which oversees the maintenance and restoration of protected sites. The inclusion of these sites in national and regional heritage registers ensures that they are safeguarded against inappropriate changes or neglect. Compliance with these regulations is crucial for any projects that might impact cultural heritage, underscoring France's commitment to preserving its historical and cultural legacy.
Risk Rating	Low Risk

Annex 2: RED II Supply Base Evaluation

Countries where RED II Supply Base Evaluation is used	
Country	Belgium
Area	-
Sustainable harvesting criteria 29(6)	
(i) The legality of harvesting operations	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ 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	Level A is used in the case of Wallonia. The text below concerns only Level B for Flanders and Brussels. In 2020, Belgium's forests covered an area of 6,893 km², constituting 22.76% of the nation's land area. The majority of this forested region—77.2%—is in Wallonia, while Flanders accounts for 22.6% and the Brussels region for only 0.25%. In addition to these forests, there are approximately 360 km² classified as “other wooded areas,” with around 89% of these located in Wallonia. Elements such as roadside or canal trees, green spaces in urban parks, and individual gardens do not meet Belgium’s criteria to be classified as forests. In compliance with Regulation 995/2010 and related forestry legislation, Belgium has implemented a clear identification system for forest products, ensuring traceability from the point of harvest to the final consumer. The EUTR is active and monitored in Belgium, with landowners and wood-harvesting companies being the main entities introducing wood to the European market. In Belgium, regional authorities are responsible for forest management policies and their implementation. Legal frameworks supporting lawful wood harvesting have been established and are enforced. According to the FSC CW CNRA (2017) working group, there is substantial evidence, both from direct experience and public reports, demonstrating compliance with logging regulations. Each region requires an authorization process for tree harvesting, supported by effective monitoring systems. Available data and expert consensus suggest that illegal logging is not a major issue in Belgium, with minor infractions considered negligible based on public reporting. The majority of public forest timber in Belgium is auctioned as “standing stock” by regional forest administrations, exempting these administrations from being classified as “operators” under the EUTR. The responsibility for EUTR compliance falls to the companies that sell

	the harvested wood. Belgium has a strong governance rating, as reflected in the World Bank Governance Index. In 2020, it scored 1.37 on "rule of law" (placing it in the top 88.94% of countries) and 1.48 on "control of corruption" (ranking in the top 89.90%). Similarly, Transparency International's CPI awarded Belgium a score of 73 out of 100 in 2021, positioning it 18th out of 180 countries. The Federal Public Service oversees the enforcement of the EUTR in Belgium. Together with customs authorities, it inspects the wood trade and can initiate legal action against non-compliant companies. In 2017, following a Greenpeace complaint, the European Commission took action against Belgium, citing insufficient monitoring of wood imports under the EUTR. In compliance with current legislation, ERDA is PEFC certified for its Chain of Custody and Due Diligence System, ensuring traceability and responsible management of its forestry products. Additionally, it collaborates exclusively with companies registered with the BCE, attesting that its partners comply with the legal, fiscal, and social obligations imposed by the state. This BCE registration requirement thus ensures transparency and legitimacy in ERDA's business relationships. Finally, its rigorous invoicing system and the use of bank transfers for all transactions attest to the legality and reliability of its forestry operations.
(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	Level A is used in the case of Wallonia. The text below concerns only Level B for Flanders and Brussels. Belgium stands out positively in terms of the ecological health of its forests, which are both robust and steadily improving. Key species such as the wolf, lynx, black woodpecker, and honey buzzard are flourishing, a promising sign of these ecosystems' resilience. National and regional administrations, aware of the impacts of climate change, have emphasized the development of adaptive and resilient forests. However, challenges persist: increased vulnerability to pests, flooding, and erosion still requires targeted action. The absence of major natural disturbances nevertheless testifies to the vitality of Belgian forests. In Flanders, reforestation is legally required when trees are cut, as stipulated by the 1990 Forest Decree. This policy mandates either replanting on-site or compensation through reforestation elsewhere, with financial alternatives used in some cases to fund new forest projects. Permits are needed, with specific reforestation plans included, while exceptions exist for certain small plots. The government monitors compliance, and violations can lead to penalties. Flanders aims to expand forest cover by 4,000 hectares by 2030 to support climate and

	biodiversity goals, though the system faces criticism for prioritizing financial compensation over physical replanting in some cases. *According to the Belgian Wood Confederation (Hout Info Bois),* ***the forest area in Flanders has remained relatively stable*** *between the surveys conducted in 1999 and 2019. While the composition of the forest is evolving—with oak gaining ground over poplar—the overall volume of standing timber has increased as trees grow larger. As a result, the forest has become more diverse, with a higher proportion of broadleaf species. The management of Flemish forests has maintained a stable productive forest area over the past two decades, demonstrating that timber harvesting is balanced by replanting or natural regeneration.* *https://www.confederationbois.be/evolution-foret-en-flandre/* *According to the INBO report "Integration of Nature Protection in Forest Policy in Flanders (Belgium)," the evolution of Flemish forests follows a similar trend. While* ***natural regeneration is more commonly used*** *in the northern part of the country, the overall forested area appears to remain stable.* *https://purews.inbo.be/ws/portalfiles/portal/781073/Vandekerkhove_2013_integrate_country_report_Belgium.pdf* FAOSTAT data shows an increase in carbon storage in the living biomass of Belgian forests, rising from 66.7 million tons in 2009 to 71.8 million tons in 2020, an increase of 7.6% despite only a 0.25% expansion in forest area over this period. Annual forest growth has accelerated, but in Wallonia, the volume of wood permitted for logging is approaching its maximum. Increased atmospheric CO2 has fostered faster forest growth, though climate change presents various risks to these ecosystems. To preserve the long-term carbon sequestration potential, it is essential to strengthen forests' adaptability to current and future climate effects. This topic has been explored over the years by national and regional authorities, resulting in effective measures. The obligation to reforest after logging is crucial to ensure the sustainability of forest resources and their carbon storage capacity. According to Belgium's seventh national communication and third biennial report on climate change, submitted in December 2017 under the United Nations Framework Convention on Climate Change, the country's forests play a major role as a carbon reservoir. Data from Global Forest Watch reveals that between 2001 and 2021, Belgian forests emitted an average of 2.64 Mt CO_2e per year while capturing 5.64 Mt CO_2e. Since 2016, FAOSTAT confirms that Belgian forests have maintained a positive net CO2 balance each year. In compliance with current legislation, ERDA is PEFC certified for its Chain of Custody and Due Diligence System, ensuring traceability and responsible management of its forestry products. Additionally, it collaborates exclusively with companies registered with the BCE, attesting that its partners comply with the legal, fiscal, and social obligations imposed by the state. This BCE registration requirement thus

	ensures transparency and legitimacy in ERDA's business relationships. Finally, its rigorous invoicing system and the use of bank transfers for all transactions attest to the legality and reliability of its forestry operations.
(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands and peatlands, are protected 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 protection of Natura 2000 areas as well as protected forests, peatlands, and wetlands in Flanders is a complex approach focused on preserving biodiversity and the integrity of these precious ecosystems. It relies on specific measures tailored to the unique characteristics of each site, aiming to maintain a delicate balance between natural processes and human activities, such as forestry or peat extraction. For each Natura 2000 area, a management plan is developed to protect endangered habitats and species. Based on the EU Habitats and Birds Directives, these plans detail authorized activities and the conditions required for their implementation. They set concrete conservation objectives, specific to the ecological needs of local flora and fauna, giving each area customized protection goals. These management plans are not static documents but evolving frameworks, regularly adjusted based on monitoring data. This allows adaptation to ecological changes and potential impacts from economic activities, such as wood harvesting or peat extraction. In some cases, strictly controlled small-scale operations are allowed, provided they do not harm biodiversity and meet the site's ecological requirements. A key element of harvesting activities in these protected areas is their adherence to strict sustainability criteria. European and national legislation mandates that these activities do not degrade the ecosystems involved. Each project or activity with potential impact undergoes an "appropriate assessment" to verify its compatibility with the conservation objectives of the area and to determine necessary measures to mitigate potential impacts. For forestry, for example, only selective logging is permitted, often aimed at fostering the restoration of natural habitats by stimulating the growth of native plants or creating favorable conditions for threatened species. Peat extraction is generally highly limited, given the vulnerability of peatlands, which play a vital role in carbon and water storage and are difficult to restore once disturbed. Protected areas in Flanders are subject to strict monitoring, ensuring continuous control over the state of habitats and species and assessing the effectiveness of management plans. Results are regularly reported to the European Commission, responsible for ensuring compliance with Natura 2000 objectives. If evaluations reveal that objectives are not being met or that negative effects are emerging, corrective measures are

	implemented to limit damage and support ecosystem resilience. Beyond management plans and sustainability criteria, legislation provides legal protection against any activity likely to harm biodiversity. In Flanders, Natura 2000 areas are subject to both national and European rules, which penalize violations such as illegal forestry or material extraction. This legal protection strengthens the assurance that conservation and restoration objectives for habitats and species are preserved in the face of economic pressures. Aside from that, material from the Sonian Forest in Brussels will be excluded to maintain the necessary protection for beech forests. In compliance with current legislation, ERDA is PEFC certified for its Chain of Custody and Due Diligence System, ensuring traceability and responsible management of its forestry products. Additionally, it collaborates exclusively with companies registered with the BCE, attesting that its partners comply with the legal, fiscal, and social obligations imposed by the state. This BCE registration requirement thus ensures transparency and legitimacy in ERDA's business relationships. Finally, its rigorous invoicing system and the use of bank transfers for all transactions attest to the legality and reliability of its forestry operations.
(iv) That harvesting is carried out considering the maintenance of soil quality and biodiversity with the aim of minimising negative impacts	
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 decree on forests in the Flemish region establishes the foundations for sustainable forest management, focusing on biodiversity preservation, soil quality, and ecological stability. It aims to protect forests by balancing their ecological, economic, and recreational functions. Each forest must have an approved management plan that includes measures to maintain environmental balance, particularly by preserving soils and biodiversity. In ecologically sensitive areas, such as the Flemish Ecological Network and nature reserves, stricter requirements apply, including humus layer conservation and limiting water extraction to maintain soil structure. The sustainable management prescribed by the decree means that the forest is viewed as a comprehensive ecosystem, where soils must be protected against erosion and other potential impacts of human activities. Forests with fragile soils, such as Gleysols and Histosols, require special attention to preserve water stability and conserve the organic layers essential for ecological balance. Compliance with the decree is monitored by inspectors from the Agency for Nature and Forests, with fines reaching up to €250,000 for unauthorized cutting or damage to protected soils. The decree also limits the use of heavy machinery to prevent soil compaction and accelerated erosion, particularly on slopes where the preservation of litter and root systems is crucial. Additionally, forest

	managers must leave wood residues, such as branches and dead trunks, on the ground to promote biodiversity and enrich the soil. These residues provide habitats for insects, fungi, and microorganisms, supporting the natural nutrient cycle and the development of soil capable of sustaining diverse vegetation. In compliance with current legislation, ERDA is PEFC certified for its Chain of Custody and Due Diligence System, ensuring traceability and responsible management of its forestry products. Additionally, it collaborates exclusively with companies registered with the BCE, attesting that its partners comply with the legal, fiscal, and social obligations imposed by the state. This BCE registration requirement thus ensures transparency and legitimacy in ERDA's business relationships. Finally, its rigorous invoicing system and the use of bank transfers for all transactions attest to the legality and reliability of its forestry operations.
(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	Level A is used in the case of Wallonia. The text below concerns only Level B for Flanders and Brussels. Belgium stands out positively in terms of the ecological health of its forests, which are both robust and steadily improving. Key species such as the wolf, lynx, black woodpecker, and honey buzzard are flourishing, a promising sign of these ecosystems' resilience. National and regional administrations, aware of the impacts of climate change, have emphasized the development of adaptive and resilient forests. However, challenges persist: increased vulnerability to pests, flooding, and erosion still requires targeted action. The absence of major natural disturbances nevertheless testifies to the vitality of Belgian forests. In Flanders, reforestation is legally required when trees are cut, as stipulated by the 1990 Forest Decree. This policy mandates either replanting on-site or compensation through reforestation elsewhere, with financial alternatives used in some cases to fund new forest projects. Permits are needed, with specific reforestation plans included, while exceptions exist for certain small plots. The government monitors compliance, and violations can lead to penalties. Flanders aims to expand forest cover by 4,000 hectares by 2030 to support climate and biodiversity goals, though the system faces criticism for prioritizing financial compensation over physical replanting in some cases. FAOSTAT data shows an increase in carbon storage in the living biomass of Belgian forests, rising from 66.7 million tons in 2009 to 71.8 million tons in 2020, an increase of 7.6% despite only a 0.25% expansion in forest area over this period. Annual forest growth has accelerated, but in Wallonia, the volume of wood permitted for logging is approaching its maximum. Increased atmospheric CO2 has fostered

	faster forest growth, though climate change presents various risks to these ecosystems. To preserve the long-term carbon sequestration potential, it is essential to strengthen forests' adaptability to current and future climate effects. This topic has been explored over the years by national and regional authorities, resulting in effective measures. The obligation to reforest after logging is crucial to ensure the sustainability of forest resources and their carbon storage capacity. According to Belgium's seventh national communication and third biennial report on climate change, submitted in December 2017 under the United Nations Framework Convention on Climate Change, the country's forests play a major role as a carbon reservoir. Data from Global Forest Watch reveals that between 2001 and 2021, Belgian forests emitted an average of 2.64 Mt CO_2e per year while capturing 5.64 Mt CO_2e. Since 2016, FAOSTAT confirms that Belgian forests have maintained a positive net CO2 balance each year. In compliance with current legislation, ERDA is PEFC certified for its Chain of Custody and Due Diligence System, ensuring traceability and responsible management of its forestry products. Additionally, it collaborates exclusively with companies registered with the BCE, attesting that its partners comply with the legal, fiscal, and social obligations imposed by the state. This BCE registration requirement thus ensures transparency and legitimacy in ERDA's business relationships. Finally, its rigorous invoicing system and the use of bank transfers for all transactions attest to the legality and reliability of its forestry operations.
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 REDII Level A risk assessment for Article 29(7) LULUCF
Level B management system at the level of the forest sourcing area	N/A

Countries where RED II Supply Base Evaluation is used	
Country	France
Area	Hauts-de-France, Grand Est, Bourgogne-Fr.-Comté
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	Level A for France by Agroenergie Conseil

Level B management system at the level of the forest sourcing area	N/A
(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	Level A for France by Agroenergie Conseil
Level B management system at the level of the forest sourcing area	N/A
(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands and peatlands, are protected 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	Level A for France by Agroenergie Conseil
Level B management system at the level of the forest sourcing area	N/A
(iv) That harvesting is carried out considering the maintenance of soil quality and biodiversity with the aim of minimising negative impacts	
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	Level A for France by Agroenergie Conseil
Level B management system at the level of the forest sourcing area	N/A
(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	Level A for France by Agroenergie Conseil
Level B management system at the level of the forest sourcing area	N/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 REDII Level A risk assessment for Article 29(7) LULUCF

Level B management system at the level of the forest sourcing area	N/A

Countries where RED II Supply Base Evaluation is used	
Country	Germany
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	Level A risk assessment for Germany published by Bundesverband Bioenergie (BBE), the Federal Bioenergy Association.
Level B management system at the level of the forest sourcing area	N/A
(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	Level A risk assessment for Germany published by Bundesverband Bioenergie (BBE), the Federal Bioenergy Association.
Level B management system at the level of the forest sourcing area	N/A
(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands and peatlands, are protected 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	Level A risk assessment for Germany published by Bundesverband Bioenergie (BBE), the Federal Bioenergy Association.
Level B management system at the level of the forest sourcing area	N/A
(iv) That harvesting is carried out considering the maintenance of soil quality and biodiversity with the aim of minimising negative impacts	
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	Level A risk assessment for Germany published by Bundesverband Bioenergie (BBE), the Federal Bioenergy Association.
Level B management system at the level of the forest sourcing area	N/A

(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	Level A risk assessment for Germany published by Bundesverband Bioenergie (BBE), the Federal Bioenergy Association.
Level B management system at the level of the forest sourcing area	N/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 REDII Level A risk assessment for Article 29(7) LULUCF
Level B management system at the level of the forest sourcing area	N/A

Countries where RED II Supply Base Evaluation is used	
Country	Luxembourg
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	In the Grand Duchy of Luxembourg, forestry operations are strictly regulated by a series of legislative texts that ensure their legality while promoting sustainable management of natural resources. The Forest Act of August 23, 2023, which came into effect on October 1, 2023, serves as the cornerstone of this legal framework. This law aims to balance the ecological, economic, and social functions of forests while establishing clear rules for forestry activities. The legislation imposes specific obligations on forest owners and operators. Any timber harvest exceeding 40 cubic meters must be declared to the Administration of Nature and Forests. This declaration must be submitted at least two working days before the start of operations, allowing authorities to ensure compliance with sustainable management principles. Once the harvest is completed, the exact volume of wood harvested, broken down by species, must be reported within 30 days. These procedural requirements ensure full transparency and enable

	precise monitoring of harvesting activities. They are complemented by regular inspections conducted by the Administration of Nature and Forests, which has the authority to impose sanctions for any violations. In compliance with current legislation, ERDA is PEFC certified for its Chain of Custody and Due Diligence System, ensuring traceability and responsible management of its forestry products. Additionally, it collaborates exclusively with companies registered with the BCE, attesting that its partners comply with the legal, fiscal, and social obligations imposed by the state. This BCE registration requirement thus ensures transparency and legitimacy in ERDA's business relationships. Finally, its rigorous invoicing system and the use of bank transfers for all transactions attest to the legality and reliability of its forestry operations.
(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	The regeneration of forests in the Grand Duchy of Luxembourg is firmly supported by a clear and detailed legislative framework, ensuring the sustainability of forest ecosystems in exploitation areas. The Forest Act, adopted on August 23, 2023, and effective as of October 1, 2023, serves as the key text governing forest management practices, particularly following harvests. Article 9 of this law imposes a strict obligation on forest owners to regenerate after any significant logging. Specifically, when the basal area of the forest stand falls below 15 square meters per hectare over an area of at least 25 ares, the owner has three years to restore the forest stand. This regeneration must aim for an equivalent replacement in terms of economic production (e.g., timber) and ecological services, thus ensuring that exploited areas quickly regain their original value and functionality. The law also specifies the means of regeneration, emphasizing sustainable practices. Natural regeneration is preferred, as it preserves genetic diversity and minimizes human intervention. However, when local conditions do not allow sufficient spontaneous regeneration, artificial or assisted planting is required. Such interventions are carefully regulated to ensure that the selected species are suited to the site, climate conditions, and long-term ecological objectives. The legislative text also includes provisions prohibiting practices harmful to the balance of forest ecosystems. For example, converting broadleaf stands into coniferous ones through artificial regeneration is strictly forbidden, except in exceptional cases justified and approved by the competent minister. This measure aims to protect biodiversity and prevent ecological imbalances that can arise from coniferous monocultures, which are often vulnerable to storms, pests, and drought. To support the implementation of these obligations, Luxembourg provides financial assistance to forest owners. This includes subsidies

	for natural or assisted regeneration of suitable species, as well as technical support from the Administration for Nature and Forests. These mechanisms ensure that owners have the resources needed to meet legal obligations while contributing to forest sustainability. Finally, regular inspections and penalties for non-compliance ensure the rigorous enforcement of these provisions. The Administration for Nature and Forests plays a key role in this process, ensuring that exploited areas are effectively regenerated within the prescribed timelines. These various legislative and administrative measures demonstrate that Luxembourg's legal framework is robust enough to ensure that areas subject to forest harvesting are systematically regenerated. This mandatory, regulated, and controlled regeneration reflects Luxembourg's commitment to sustainable management of its forest resources, which is essential to addressing current environmental and climate challenges. In compliance with current legislation, ERDA is PEFC certified for its Chain of Custody and Due Diligence System, ensuring traceability and responsible management of its forestry products. Additionally, it collaborates exclusively with companies registered with the BCE, attesting that its partners comply with the legal, fiscal, and social obligations imposed by the state. This BCE registration requirement thus ensures transparency and legitimacy in ERDA's business relationships. Finally, its rigorous invoicing system and the use of bank transfers for all transactions attest to the legality and reliability of its forestry operations.
(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands and peatlands, are protected 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	Forests located in wetlands and peatlands in the Grand Duchy of Luxembourg benefit from a robust legal framework that ensures their preservation and sustainable management. These provisions, established by multiple legal texts, demonstrate that these sensitive ecosystems are not only protected but also valued for their crucial ecological role. The current legislation allows for balanced management of these areas, where the responsible use of natural resources does not compromise their long-term conservation. The Forest Law, which came into effect in 2023, is a key pillar for the protection of Luxembourg's forests. It places particular emphasis on wetlands and peatlands, highlighting their ecological role in regulating hydrological cycles, storing carbon, and maintaining biodiversity. This law explicitly prohibits destructive practices, such as drainage or clear-cutting, in these ecosystems, while promoting sustainable forest management. The measures included in this law ensure the responsible use of resources, such as timber, by limiting negative environmental impacts.

	National forest inventories provide continuous monitoring of the condition of wetland ecosystems, enabling practices to be adjusted based on conservation needs. The law of July 18, 2018, on the protection of nature and natural resources provides additional legal protection by emphasizing the conservation of natural habitats, including wetlands and peatlands, through their integration into protected networks like Natura 2000. These areas are identified as essential for biodiversity and enjoy specific protections, such as the prohibition of any activity that could disrupt their natural hydrological balance. The restoration of degraded peatlands and wetlands is also enshrined in this law, demonstrating Luxembourg's commitment to revitalizing these precious ecosystems. Furthermore, the protection of species directly dependent on them, such as rare amphibians or carnivorous plants specific to peatlands, reflects the comprehensive approach adopted by the legislation. In addition to these laws, specific initiatives strengthen the protection of wetlands and peatlands. For instance, integral forest reserves prohibit any form of human exploitation, allowing ecosystems to regenerate naturally. In areas where exploitation is permitted, sustainable practices are enforced, such as preserving habitat trees and deadwood, which play a crucial role in maintaining forest food chains. Aging islands, where forests are left to evolve naturally, also ensure biodiversity preservation by allowing mature forests to develop. These measures aim to reconcile nature conservation with limited but sustainable resource use. Luxembourg's legislative framework clearly establishes that the use of materials in wetlands and peatlands is possible as long as it adheres to sustainability and conservation requirements. Strict prohibitions, regular scientific monitoring, and restoration obligations ensure that these unique ecosystems are not endangered. Designated protected areas and sustainable management principles provide a solid foundation to ensure that human activities in these spaces remain compatible with their essential ecological functions. Thus, wetlands and peatland forests in Luxembourg are not only protected by strong legal texts but also supported by proactive management measures. This demonstrates that resource use in these areas is not only regulated but can also be integrated into a long-term conservation vision that is environmentally respectful and beneficial to society. In compliance with current legislation, ERDA is PEFC certified for its Chain of Custody and Due Diligence System, ensuring traceability and responsible management of its forestry products. Additionally, it collaborates exclusively with companies registered with the BCE, attesting that its partners comply with the legal, fiscal, and social obligations imposed by the state. This BCE registration requirement thus ensures transparency and legitimacy in ERDA's business relationships. Finally, its rigorous invoicing system and the use of bank transfers for all

	transactions attest to the legality and reliability of its forestry operations. Moreover, ERDA will verify the origin of the material and ensure that it does not come from wetlands or peatlands. Otherwise, ERDA will exclude it from SBP-certified material.
(iv) That harvesting is carried out considering the maintenance of soil quality and biodiversity with the aim of minimising negative impacts	
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 the Grand Duchy of Luxembourg, the legislative framework for forest management is based on stringent provisions aimed at ensuring that forest harvesting minimizes its impact on biodiversity. The main legal texts and measures reflect a deep consideration of ecological issues, demonstrating that the legislation is sufficient to protect biodiversity while allowing for the sustainable use of forest resources. The Forest Law of August 23, 2023, forms the foundation of sustainable forest management in Luxembourg. It explicitly aims to preserve the ecological functions of forests, particularly biodiversity, while maintaining their social and economic roles. This law establishes clear objectives for the conservation of forest ecosystems, emphasizing natural regeneration, soil vitality, and habitat protection for local species. Notable provisions of this law include sustainability criteria applied to all forestry operations, ensuring that biodiversity is not compromised by harvesting activities. These criteria involve selective cutting management and the integration of sensitive areas into forest management plans. The law also provides for the creation of forest reserves and integral forest reserves. Forest reservesare actively managed to restore or preserve natural habitats, while integral forest reservesare completely free from human intervention, allowing ecosystems to evolve naturally. These reserves foster biodiversity development by creating refuges for vulnerable species and enhancing the resilience of forest ecosystems to disturbances. Legal texts also mandate the conservation of biotope trees, which play a crucial role in maintaining forest ecosystems. These trees, often characterized by cavities or decaying wood, provide shelter for species such as nesting birds, bats, and saproxylic insects. Additionally, the retention of deadwood in forests is embedded in forestry management standards, as it serves as an essential resource for nutrient cycling and local food chains. Aging islands, defined by legislation, are forest plots where no harvesting occurs. These areas allow trees to age naturally, offering stable habitats for numerous species and promoting the formation of nutrient-rich soils. The establishment of these islands reflects a clear commitment to long-term biodiversity promotion. To protect soils, forest regulations mandate the use of low-impact harvesting techniques. Heavy machinery usage is restricted, particularly

	on sensitive soils, through meticulous route planning and the use of temporary structures such as wooden mats. These practices reduce soil compaction and erosion, thereby preserving habitats. The legal measures are reinforced by a strict monitoring system. The Administration of Nature and Forests oversees forestry activities to ensure compliance with the ecological objectives outlined by the law. Violations of standards, particularly those related to biodiversity, are penalized, ensuring adherence to established rules. Finally, Luxembourg's provisions align with European directives, including the Habitats Directive, the Birds Directive, and the EU Forest Strategy for 2030. These frameworks strengthen local obligations for biodiversity preservation while providing a harmonized regional approach. Collectively, these legal and practical measures clearly demonstrate that forest harvesting in Luxembourg is conducted with minimal impact on biodiversity. The combination of protected areas, ecosystem-friendly practices, and control mechanisms ensures that forest ecosystems can continue to fulfill their essential functions for both nature and society. Thus, Luxembourg's legislation represents a robust and sufficient model for sustainable forest management. Besides, forestry legislation imposes strict obligations on any company wishing to extract materials from forests. According to the Forest Act of August 23, 2023, which came into force on October 1, 2023, any logging operation estimated at more than 40 m³ must be reported to the Nature and Forestry Administration at least two working days before the start of operations. Furthermore, specific permits are required for interventions such as logging exceeding 50 ares or the creation of biotopes on forest land. These measures aim to ensure sustainable forest management and protect forest ecosystems. Therefore, it is illegal for a company to harvest forest materials without obtaining the appropriate authorizations. In compliance with current legislation, ERDA is PEFC certified for its Chain of Custody and Due Diligence System, ensuring traceability and responsible management of its forestry products. Additionally, it collaborates exclusively with companies registered with the BCE, attesting that its partners comply with the legal, fiscal, and social obligations imposed by the state. This BCE registration requirement thus ensures transparency and legitimacy in ERDA's business relationships. Finally, its rigorous invoicing system and the use of bank transfers for all transactions attest to the legality and reliability of its forestry operations.
(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 the Grand Duchy of Luxembourg, sustainable forest management is at the core of environmental and economic policies. The current legislative framework, particularly the Forest Act of August 23, 2023, establishes

	principles and rules that clearly demonstrate that forestry harvesting practices are designed to maintain or even enhance the long-term production capacity of forests. These provisions ensure that the productive, ecological, and social functions of forests are respected within a sustainable perspective. Article 7 of the Forest Act lays the foundation for sustainable forest management. This management explicitly aims to: • Preserve forest productivity by ensuring that human activities do not deplete their potential. • Maintain biological diversity and the natural or assisted regeneration capacity of forest stands. • Enable forests to sustainably fulfill their ecological, economic, and social functions. These principles enshrined in the law aim to ensure that exploitation practices, including timber harvesting, do not compromise the forests' ability to provide resources for future generations. Article 9 of the law imposes a regeneration obligation on forest owners following any significant felling. The main provisions include: A three-year deadline to ensure the reconstitution of exploited forest stands. A requirement that the reconstituted stands are equivalent in ecological and economic value. Article 10 of the law prohibits specific practices that could harm the forests' long-term production capacity, including: • Forest grazing, which can damage young shoots. • Unauthorized use of pesticides or fertilizers, which could disrupt the soil's natural cycles. • Whole-tree harvesting and the removal of residual material, which deplete soils of organic matter. Article 8 of the law imposes mandatory notification for harvests exceeding 40 m³. This requirement allows the Nature and Forest Administration to monitor and assess the impacts of harvesting on ecosystems. Detailed post-harvest reports ensure that practices comply with established standards and that appropriate regeneration measures are implemented. Luxembourg's legislative framework aligns with European and international commitments. The EU Forestry Strategy and the climate objectives of the Paris Agreement emphasize the importance of sustainable forest management to ensure their role as carbon sinks and sources of biodiversity. These texts reinforce the legitimacy of Luxembourg's forestry harvesting practices. The various provisions of the Luxembourg Forest Act, particularly Articles 7, 8, 9, and 10, demonstrate that forest harvesting is strictly regulated to preserve the long-term production capacity of forests. The obligation for prompt regeneration, prohibitions on harmful practices, and

	systematic control of exploitation activities are effective tools to ensure sustainable management. In compliance with current legislation, ERDA is PEFC certified for its Chain of Custody and Due Diligence System, ensuring traceability and responsible management of its forestry products. Additionally, it collaborates exclusively with companies registered with the BCE, attesting that its partners comply with the legal, fiscal, and social obligations imposed by the state. This BCE registration requirement thus ensures transparency and legitimacy in ERDA's business relationships. Finally, its rigorous invoicing system and the use of bank transfers for all transactions attest to the legality and reliability of its forestry operations.
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 REDII Level A risk assessment for Article 29(7) LULUCF
Level B management system at the level of the forest sourcing area	N/A

Annex 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

During our recent operations review, we conducted an audit of our processing residues feedstocks to ensure that everything meets the SBP's standards. More than 95% of our secondary feedstock originates from sawmills within the Fruytier group, of which ERDA is a part. In addition to the audits carried out, a number of on-site tests can attest to the processing residues nature of these feedstocks (delivery receipts, automatically taken photographs at the arrival of the trucks, and the characterization of the feedstock).

Feedstock inspection and classification upon receipt

As previously mentioned, we possess comprehensive evidence supporting the origin and processing of our feedstocks. This includes photographs, delivery receipts, and detailed knowledge of the sourcing procedures. Our processing residues feedstocks primarily originate from sawmills that are an integral part of our group. This extensive documentation, combined with our close relationship with these sawmills, ensures transparency and traceability in our supply chain. 10.3 Supplier audit for processing residues.

Supplier audit for processing residues and post-consumer feedstock

Our organization conducted supplier audits to verify the compliance of residual materials purchased. Visits were carried out at each supplier site to ensure that the supplied residues genuinely originated from production processes and not from intentionally downgraded materials. The evaluation, based on direct observations and the review of production and waste management documents, showed that the materials matched the products received and that the quantities of residues aligned with the suppliers' normal production capacities. No discrepancies or anomalies were detected, confirming the compliance and transparency of our supply chain.

Annex 4: 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).

Country: France - -

REDII Article 29 (2): Soil quality and soil carbon	
Biofuels, bioliquids and biomass fuels produced from waste and residues derived not from forestry but from agricultural land shall be taken into account for the purposes referred to in points (a), (b) and (c) of the first subparagraph of paragraph 1 only where operators or national authorities have monitoring or management plans in place in order to address the impacts on soil quality and soil carbon. Information about how those impacts are monitored and managed shall be reported pursuant to Article 30(3).	
(i) Impacts on soil quality	
Step 1: Identification of applicable laws	
Have the applicable law(s) been identified?	No, management plan needed at economic operator level (go to step 4)
List of applicable law(s)	N/A
Sources	N/A
Step 2: Description of enforcement and monitoring by competent authorities	
Description of the practical implementation and monitoring of the law(s)	N/A
Sources	N/A
Is the enforcement and monitoring ensured for the identified law(s)?	No, management plan needed at economic operator level (go to step 4)
Step 3: Evaluation of the effectiveness of the legal framework	
Evaluation of the practical implementation of the	N/A

law(s) and explanation for the evaluation	
Sources	N/A
Is legal framework effective?	No, management plan needed at economic operator level (go to step 4)
Step 4: Detailed description of a management plan and monitoring at economic operator level	ERDA has no negative impact on soil quality. The only agricultural TOF that supply ERDA in France come from perennial woody crops at the end of their production cycle. Specifically, aging plants are removed to make way for new growth. The machinery used for this process has no greater impact on the soil than traditional agricultural equipment. A management plan has been implemented to specifically verify deliveries from all suppliers of old or diseased wood. A visual inspection is conducted to ensure that only material from these cultivated lands is delivered. If any other types of agricultural TOF are detected, ERDA would check the upstream control chain before using them in its production.
(ii) Impact on soil carbon	
Step 1: Identification of applicable laws	
Have the applicable law(s) been identified?	No, management plan needed at economic operator level (go to step 4)
List of applicable law(s)	N/A
Sources	N/A
Step 2: Description of enforcement and monitoring by competent authorities	
Description of the practical implementation and monitoring of the law(s)	N/A
Sources	N/A
Is enforcement and monitoring ensured for the identified law(s)?	No, management plan needed at economic operator level (go to step 4)
Step 3: Evaluation of the effectiveness of the legal framework	
Evaluation of the practical implementation of the law and explanation for the evaluation	N/A
Sources	N/A

Is legal framework effective?	No, management plan needed at economic operator level (go to step 4)
Step 4: Detailed description of a management plan and monitoring applied at economic operator level	ERDA does not affect carbon storage in the soil. When old or diseased perennial woody crops are removed, they are replaced with new ones, ensuring that the carbon levels in the soil remain stable. This process means there is no alteration in soil carbon storage, maintaining the balance of carbon in these cultivated lands. A management plan is in place to verify all deliveries from suppliers of old or diseased wood. Visual inspections ensure that only material from these agricultural sources is delivered. Should other types of agricultural TOF be detected, ERDA would verify the upstream control chain before incorporating them into its production.

REDII Article 29 (3a): Protection of land with high biodiversity value	
Biofuels, bioliquids and biomass fuels produced from agricultural biomass taken into account for the purposes referred to in points (a), (b) and (c) of the first subparagraph of paragraph 1 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, 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;*	
Description of a management system process to meet the requirement.	In France, the production of agricultural materials in highly biodiverse forests and other species-rich, non-degraded wooded areas, or those identified as such by the relevant authorities, is prohibited. Consequently, ERDA is unable to buy materials from these locations.
REDII Article 29 (3b): Protection of land with high biodiversity value	
Biofuels, bioliquids and biomass fuels produced from agricultural biomass taken into account for the purposes referred to in points (a), (b) and (c) of the first subparagraph of paragraph 1 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, or 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;*	
Description of a management system process to meet the requirement.	In France, the production of agricultural materials in highly biodiverse forests and other species-rich, non-degraded wooded areas, or those identified as such by the relevant authorities, is prohibited. Consequently, ERDA is unable to buy materials from these locations.
REDII Article 29 (3c): Protection of land with high biodiversity value	
Biofuels, bioliquids and biomass fuels produced from agricultural biomass taken into account for the purposes referred to in points (a), (b) and (c) of the first subparagraph of paragraph 1 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: *(c) areas designated:* *(i) by law or by the relevant competent authority for nature protection purposes; or* ***(ii)** for the protection of rare, threatened or endangered ecosystems or species recognised by international agreements or included in lists drawn up by intergovernmental organisations or the International Union for the Conservation of Nature, subject to their recognition in accordance with the first subparagraph of Article*	

Description of a management system process to meet the requirement.	Since ERDA sources only old or diseased perennial woody crops from agricultural lands, these areas are not designated as having high biodiversity value. As long as the cultivation of these crops is permitted on these lands, the replacement of old or diseased plants is also allowed. ERDA has implemented a management system to ensure that all its operations are conducted legally, including the legality of harvesting old woody crops.

REDII Article 29 (3d): Protection of land with high biodiversity value

Biofuels, bioliquids and biomass fuels produced from agricultural biomass taken into account for the purposes referred to in points (a), (b) and (c) of the first subparagraph of paragraph 1 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.

Description of a management system process to meet the requirement.	Same management as in 3c, adapted to grassland.

REDII Article 29 (4a): Protection of land with high carbon stock

Biofuels, bioliquids and biomass fuels produced from agricultural biomass taken into account for the purposes referred to in points (a), (b) and (c) of the first subparagraph of paragraph 1 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;

This paragraph shall not apply if, at the time the raw material was obtained, the land had the same status as it had in January 2008.

Description of a management system process to meet the requirement.	The agricultural lands used for the type of perennial woody crops sourced by Erda are never located in wetlands, including peatlands or semi-permanently waterlogged soils. The conditions required for their cultivation are not compatible with such water-saturated environments.

REDII Article 29 (4b): Protection of land with high carbon stock

Biofuels, bioliquids and biomass fuels produced from agricultural biomass taken into account for the purposes referred to in points (a), (b) and (c) of the first subparagraph of paragraph 1 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:

(b) continuously forested areas, namely land spanning more than one hectare with trees higher than five

metres and a canopy cover of more than 30 %, or trees able to reach those thresholds in situ; *This paragraph shall not apply if, at the time the raw material was obtained, the land had the same status as it had in January 2008.*	
Description of a management system process to meet the requirement.	The type of perennial woody crops sourced by ERDA do not grow in areas colonized by trees taller than 5 meters, as these conditions are unsuitable for their cultivation. As a result, it is impossible for ERDA to source agricultural TOF from such areas, as these crops are exclusively cultivated on open land without large tree cover.
REDII Article 29 (4c): Protection of land with high carbon stock	
Biofuels, bioliquids and biomass fuels produced from agricultural biomass taken into account for the purposes referred to in points (a), (b) and (c) of the first subparagraph of paragraph 1 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: *(c) land spanning more than one hectare with trees higher than five metres and a canopy cover of between 10 % and 30 %, or trees able to reach those thresholds in situ, unless evidence is provided that the carbon stock of the area before and after conversion is such that, when the methodology laid down in Part C of Annex V is applied, the conditions laid down in paragraph 10 of this Article would be fulfilled.* *This paragraph shall not apply if, at the time the raw material was obtained, the land had the same status as it had in January 2008.*	
Description of a management system process to meet the requirement.	The type of perennial woody crops sourced by ERDA do not grow in areas colonized by trees taller than 5 meters, as these conditions are unsuitable for their cultivation. As a result, it is impossible for ERDA to source agricultural TOF from such areas, as these crops are exclusively cultivated on open land without large tree cover.

REDII Article 29 (5): Protection of peatland	
Biofuels, bioliquids and biomass fuels produced from agricultural biomass taken into account for the purposes referred to in points (a), (b) and (c) of the first subparagraph of paragraph 1 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.	
Description of a management system process to meet the requirement.	In France, there are rare cases the type of perennial woody crops sourced by ERDA cultivated in drained peatland areas, which have been regulated since 2008. After a cartographic analysis of the soils, it appears that the current suppliers of old or diseased wood for ERDA do not include any agricultural lands from these drained peatlands. If ERDA's suppliers were to change, special attention would be given to the source of the agricultural TOF, and any potentially affected regions would be excluded to ensure that no unsustainable sourcing occurs.