



Supply Base Report:

Duferco Biomasse Srl Second Surveillance Audit

Sustainable Biomass Program
sbp-cert.org



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

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

Document history

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1 Overview

Producer name:	Duferco Biomasse Srl
Producer address:	Via Paolo Imperiale n. 4, 16126 Genova, Italy
SBP Certificate Code:	SBP-06-26
Geographic position:	44.414260, 8.922520
Primary contact:	Luca Poli, +39 349 934 3689, l.poli@dufercobiomasse.com
Company website:	www.dufercobiomasse.com
Date report finalised:	12 Feb 2026
SBR reporting period from:	01 Jan 2025
SBR reporting period to:	31 Dec 2025
Name of the Certification Body:	Control Union Certifications BV
Certification Body Approval date:	18 May 2026
SBP Standard(s) used:	SBP Standard 1: Feedstock Compliance v2.0, SBP Standard 2: Feedstock Verification v2.0, SBP Standard 4: Chain of Custody v2.0, SBP Standard 5: Collection and Communication of Data v2.0, Instruction Document 1A: SBP Requirements for Primary Feedstock from Trees Outside Forests (TOF) v1.0, Instruction Document 5E: Collection and Communication of Energy and Carbon data. v2.1, Instruction Document EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413 v2.0
Feedstock origin (countries)	Spain (6 regions in East and South Spain), Italy (Tuscany), Italy (Apulia), Italy (Northern and Central Regions, Sardinia), Italy (Lazio), Italy (Emilia-Romagna), Italy (Lombardy), Italy (Veneto)
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

Duferco Biomasse srl is part of the Duferco Group from Genova (Italy) and deals with woodchips, pellets and timber logs as a trader, and woodchips as a producer in Spain and Italy; Duferco Biomasse also trades agricultural woody residues and forestry residues. The strategy of the company is extending trading to new products and markets, within the woody products.

In Europe Duferco Biomasse has set up operations in Italy, Spain, Portugal, France and Belgium to enable them to control the flow from forest and agricultural land all the way to the end user premises.

The physical separation system is used to manage any Chain of Custody.

Duferco Biomasse is PEFC, FSC, ISCC and ISO certified.

A managing program runs the transport documents and invoices and lot documentation is collected as evidence of compliance to legislation and certification requirements.

Products included in the scope of SBP Certification: *WB 1.1 Wood pellets, WB 2.1 Wood chips*

Number of employees: 14

Annual maximum production capacity (metric tonnes): 500000

Number of direct feedstock suppliers: 42

Approximate number of feedstock sub-suppliers: 0

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

In Spain feedstock is sourced from forests within the six Regions of the Supply Base, that are: Aragon, Catalunya, Comunidad Valenciana, Murcia, Andalucia, Castilla-La Mancha and it is bought from suppliers that collect standing trees lots from land owners/managers in the Supply Base, then fell the trees (from forests and TOF sites).

Timber is then chipped and transported to one of the port facilities in Spain, from where woodchips are then shipped by vessels to the recipient.

In the Regions of Italy, feedstock (coming from forests and TOF) is bought from suppliers that collect standing trees lots from land owners/managers in the Supply Base, then fell the trees. SBE was completed for the following Regions of Italy: Tuscany, Lazio, Emilia-Romagna, Lombardy, Veneto (forests + TOF) and Apulia (only TOF).

SBP-controlled feedstock may come from the other Regions of Northern and Central Italy plus Sardinia.

Timber is then chipped and transported either to the power plants or to the port facilities, where woodchips are then shipped by vessels to the recipient.

Only in Apulia Region of Italy, feedstock is only TOF coming from agricultural land (dead olive trees) and comes from a single supplier that collects standing trees lots from land owners in Apulia: the trees are then eradicated, chipped and wood chips are transported to the port facility in Brindisi, where they are then shipped by vessels to the recipient.

Pellets are only traded from other companies.

Duferco Biomasse usually gains property of woodchips at the forest/TOF sites or at the ports for woodchips and on the vessel for pellet.

2.2 Detailed description of the Supply Base

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

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

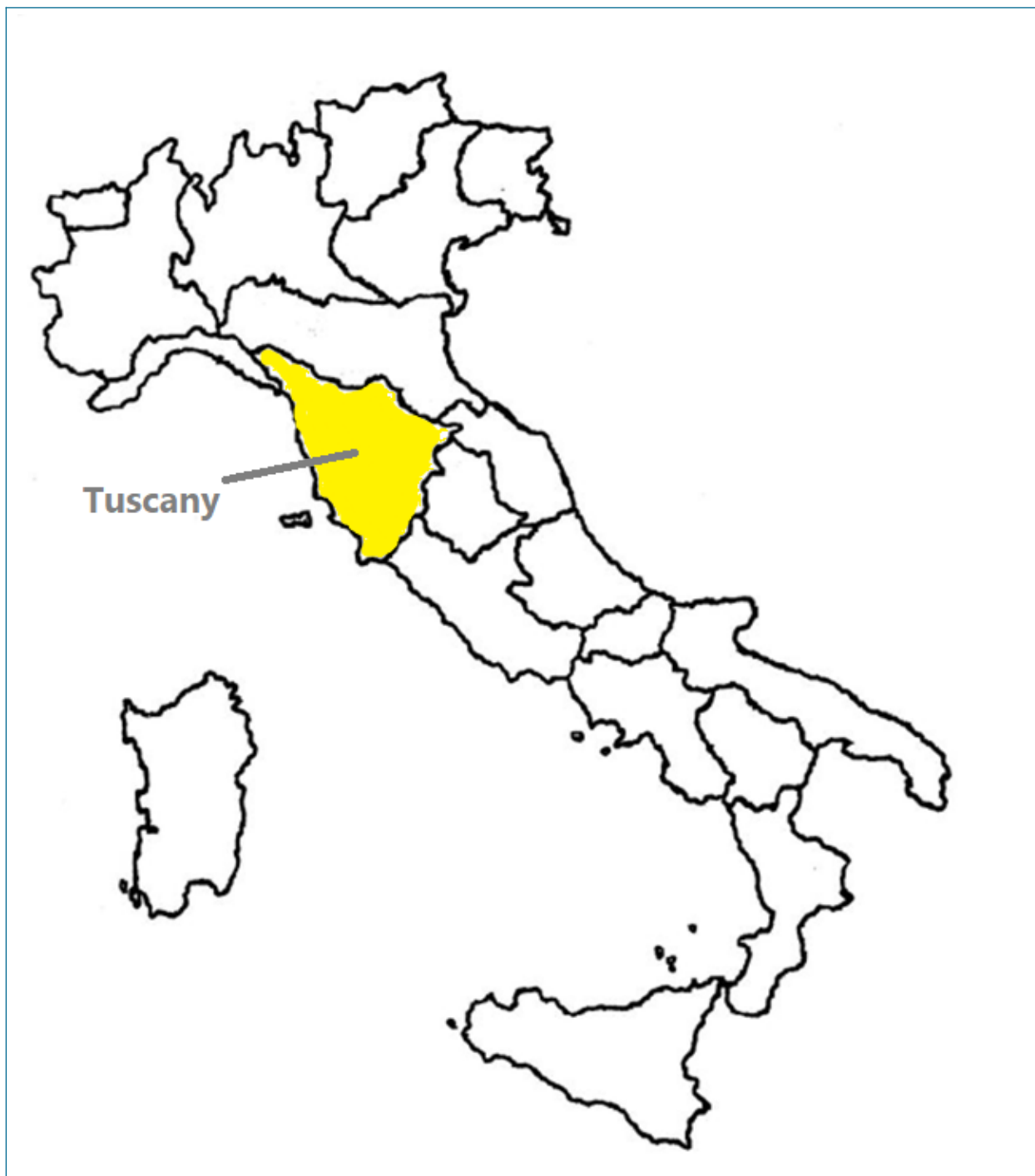
Annex 2 is generated if EU RED SBE is in the scope for each country separately.

Country	Spain
Area/Region	6 regions in East and South Spain
Exclusions	
Feedstock types	Primary
Feedstock Product Groups	Forest feedstock (1A), Trees outside forest (TOF) - Agricultural land feedstock (3A)
Feedstock inputs	SBP Compliant 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:	
Feedstock is mostly not certified to an SBP-recognised certification scheme.	
Feedstock types included in SBE:	Primary
Includes EU RED SBE:	Yes
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	Yes
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	14.4600
Map(s) of the Supply Base area:	



Country	Italy
Area/Region	Tuscany
Exclusions	
Feedstock types	Primary
Feedstock Product Groups	Forest feedstock (1A), Trees outside forest (TOF) - Urban and landscape feedstock (2A), Trees outside forest (TOF) - Agricultural land feedstock (3A)
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:	
Feedstock is mostly not certified to an SBP-recognised certification scheme but also may be sourced as PEFC Controlled Sources (forests).	
Feedstock types included in SBE:	Primary

Includes EU RED SBE:	Yes
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	Yes
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	1.1000
Map(s) of the Supply Base area:	



Country	Italy
Area/Region	Apulia
Exclusions	
Feedstock types	Primary
Feedstock Product Groups	Trees outside forest (TOF) - Agricultural land feedstock (3A)

Feedstock inputs	SBP Compliant 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:	
Feedstock is all not certified to an SBP-recognised certification scheme.	
Feedstock types included in SBE:	Primary
Includes EU RED SBE:	Yes
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	Yes
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	0.3400
Map(s) of the Supply Base area:	



Country	Italy
Area/Region	Northern and Central Regions, Sardinia
Exclusions	

Feedstock types	Primary
Feedstock Product Groups	Forest feedstock (1A)
Feedstock inputs	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:	
SBP-controlled feedstock comes from PEFC Controlled Sources feedstock.	
Feedstock types included in SBE:	Primary
Includes EU RED SBE:	Yes
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	No
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	8.8900
Map(s) of the Supply Base area:	



Country	Italy
Area/Region	Lazio
Exclusions	
Feedstock types	Primary

Feedstock Product Groups	Forest feedstock (1A), Trees outside forest (TOF) - Urban and landscape feedstock (2A), Trees outside forest (TOF) - Agricultural land feedstock (3A)
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:	
Feedstock is mostly not certified to an SBP-recognised certification scheme but also may be sourced as PEFC Controlled Sources (forests).	
Feedstock types included in SBE:	Primary
Includes EU RED SBE:	Yes
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	Yes
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	0.5400
Map(s) of the Supply Base area:	



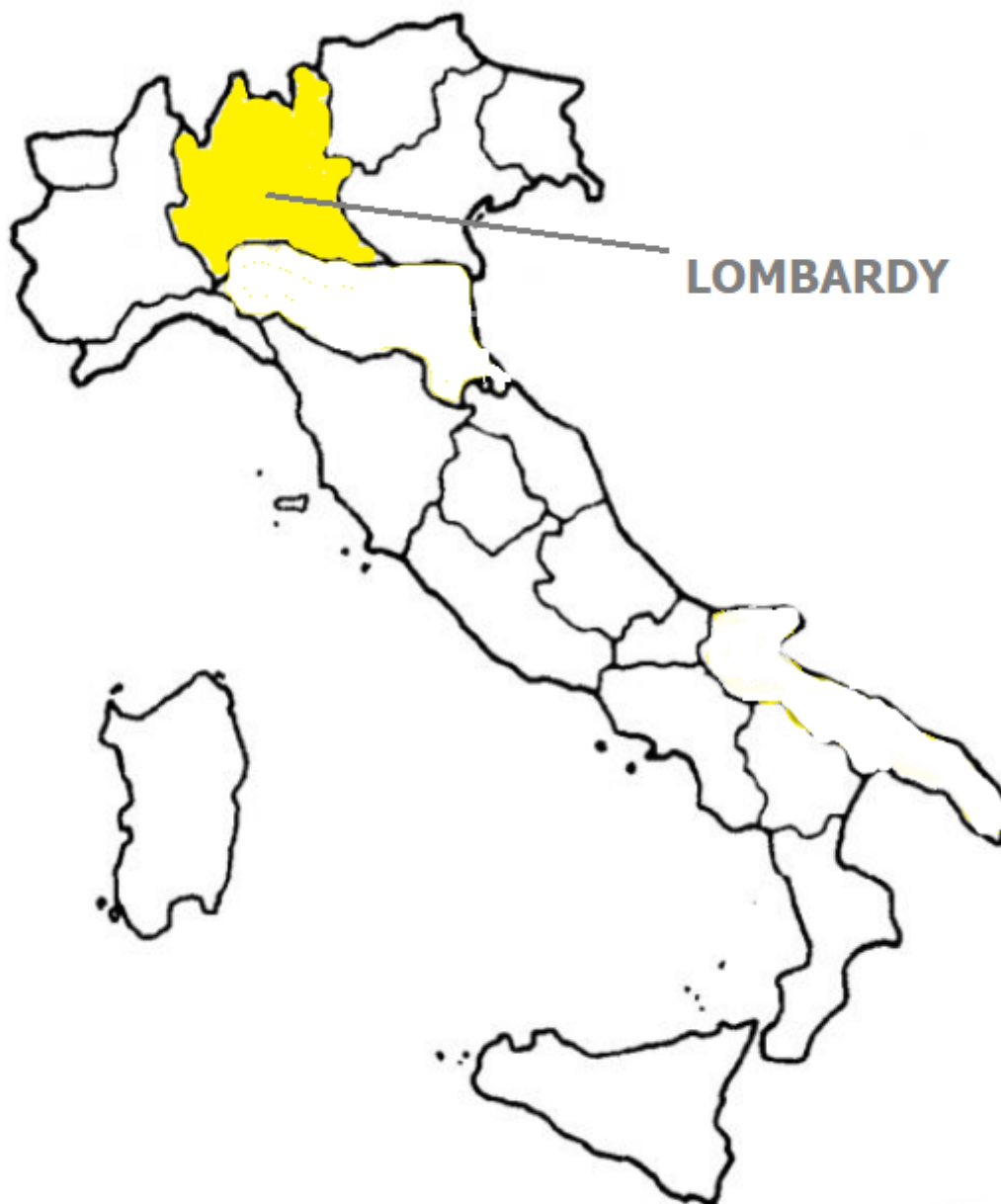
Country	Italy
Area/Region	Emilia-Romagna
Exclusions	
Feedstock types	Primary

Feedstock Product Groups	Forest feedstock (1A), Trees outside forest (TOF) - Urban and landscape feedstock (2A), Trees outside forest (TOF) - Agricultural land feedstock (3A)
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:	
Feedstock is mostly not certified to an SBP-recognised certification scheme but also may be sourced as PEFC Controlled Sources (forests).	
Feedstock types included in SBE:	Primary
Includes EU RED SBE:	Yes
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	Yes
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	0.6000
Map(s) of the Supply Base area:	



Country	Italy
Area/Region	Lombardy
Exclusions	

Feedstock types	Primary
Feedstock Product Groups	Forest feedstock (1A), Trees outside forest (TOF) - Urban and landscape feedstock (2A), Trees outside forest (TOF) - Agricultural land feedstock (3A)
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:	
Feedstock is mostly not certified to an SBP-recognised certification scheme but also may be sourced as PEFC Controlled Sources (forests).	
Feedstock types included in SBE:	Primary
Includes EU RED SBE:	Yes
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	Yes
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	0.6500
Map(s) of the Supply Base area:	



Country	Italy
Area/Region	Veneto
Exclusions	

Feedstock types	Primary
Feedstock Product Groups	Forest feedstock (1A), Trees outside forest (TOF) - Urban and landscape feedstock (2A), Trees outside forest (TOF) - Agricultural land feedstock (3A)
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:	
Feedstock is mostly not certified to an SBP-recognised certification scheme but also may be sourced as PEFC Controlled Sources (forests).	
Feedstock types included in SBE:	Primary
Includes EU RED SBE:	Yes
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	Yes
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	0.4500
Map(s) of the Supply Base area:	



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:

Pinus halepensis	Aleppo pine
Pinus pinea	Umbrella pine
Pinus pinaster	Maritime pine
Pinus nigra	Black pine
Pinus radiata	Monterey pine
Pinus sylvestris	Scots pine
Pinus strobus	White pine
Pinus spp	Pine trees
Pinus uncinata	Mountain pine
Quercus ilex	Holm oak
Quercus suber	Cork oak
Quercus coccifera	Kermes oak
Juniperus thurifera	Spanish juniper
Eucalyptus spp	Eucalyptus
Populus nigra	Black poplar
Populus x euramericana	Hybrid poplar
Abies alba	Silver fir
Acer spp.	Maple
Ailanthus altissima	Ailanthus
Alnus cordata	Italian Alder
Alnus glutinosa	Black Alder
Arbutus unedo	Strawberry tree
Betula pendula	Birch
Carpinus betulus	Hornbeam
Castanea sativa	Chestnut

Cedrus spp	Cedar
Corylus avellana	Hazelnut tree
Cupressus sempervirens	Cypress
Cupressus arizonica	Arizona Cypress
Fagus sylvatica	European Beech
Fraxinus angustifolia	Narrow-leaved Ash
Fraxinus excelsior	Common ash
Fraxinus ornus	Flowering ash
Juglans nigra	Black walnut
Juglans regia	Walnut
Larix decidua	Larch
Malus sylvestris	Apple tree
Ostrya carpinifolia	European hop-hornbeam
Picea abies	Norway spruce
Populus alba	White poplar
Populus tremula	Aspen
Prunus avium	Wild cherry
Prunus spp	Fruit trees
Pseudotsuga menziesii	Douglas fir
Pyrus communis	Pear tree
Quercus cerris	Turkey Oak
Quercus petraea	Sessile Oak
Quercus pubescens	Downy oak
Quercus robur	English oak
Quercus rubra	Red oak
Robinia pseudoacacia	Black Locust
Salix spp	Willow
Sorbus spp	Rowan
Tilia cordata	Lime
Ulmus spp	Elm

Olea europaea	Olive tree
Platanus spp	Plane tree
Populus spp	Poplar
Paulownia tomentosa	Paulownia
Celtis australis	Hackberry tree
Crataegus monogyna	Hawthorn
Ligustrum sempervirens	Privet
Prunus laurocerasus	Cherry Laurel
Morus nigra	Mulberry
Ilex aquifolium	Holly
Euonymus europaeus	European spindle

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: Some non-certified feedstock was sourced in North-east of Italy as a pest contro measures against bark beetle infection following Vaia storm. In Apulia Region in Italy olive trees are eradicated as a measure to contrast the spread of the Xylella bacteria.

e. Hardwood (i.e. broadleaf trees): specify proportion of feedstock from (%): 30.00

f. Softwood (i.e. coniferous trees): specify proportion of feedstock from (%): 70.00

g. Proportion of feedstock composed of or derived from saw logs by weight (%): 5.00

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 (%): 0.00

j. Select forest type(s) where the primary feedstock was sourced from: Other Naturally Regenerated Forest of Introduced Species

k. Select the main harvesting system(s) used for the sourced primary feedstock: Thinning; Other

l. Volume of primary feedstock from primary forest: 0

m. Volume of processing residues feedstock: 0

Physical form of the feedstock:

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

o. Volume of post-consumer feedstock: 0

Physical form of the feedstock:

p. Estimated amount of EU RED-compliant sustainable feedstock that could be collected annually by the BP: 300000 tonnes

q. What is the estimated amount of EU RED-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated): 3500000.00 tonnes

Explanation: Almost all feedstock that can be collected in the Supply Base could be EU RED-compliant as both Spain and Italy have a strong legal framework and control system in place about forestry operations and also harvesting in plantations.

3 Supply Base Risk Assessments and Risk Management Measures

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

☐ Not Applicable – Supply Base Evaluation not implemented

3.1 Summary of the Supply Base Evaluation

Supply Base Evaluation regarded 6 Regions in Spain and 6 Regions in Italy, with this distinction:

- forests and agricultural TOF are the Supply Base in Spain;
- forests and all TOF are the Supply Base in Tuscany, Lazio, Emilia-Romagna, Lombardy and Veneto (Italy);
- only TOF are the Supply Base in Apulia (Italy);
- only forests are the Supply Base in the other Regions of Northern and Central Italy plus Sardinia, where only SBP-controlled feedstock is collected.

3.2 Conflicts with applicable national and sub-national legislation

Forestry and agriculture law enforcement apply at regional level both in Spain and Italy, but other issues apply at National level (for instance labour rights).

No conflict with applicable legislation was detected.

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

Indicator with specified risk:
2.1.2 Threats to and impacts on the identified key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified and evaluated.
Description of the specific risk:
Many Nature 2000 sites in Spain cover forested land, meaning that threats and impacts to biodiversity and HCV issues may happen and mitigation measures have to be implemented when sourcing from these areas. Information are widely available on high conservation values in the GIS viewers of the Autonomous Communities (Natura 2000 Network, Protected Areas, Sites of Cultural Interest), meaning that evaluation can be done by forestry engineers that supervise works in the forests/TOF lots.
Mitigation measure:
Duferco and its suppliers has implemented appropriate control systems and procedures to ensure that key ecosystems and habitats are conserved: -Manual of good environmental practices in Sustainable Forest Management -Field visits (before and during felling works or TOF sourcing) -When Duferco buys timber from suppliers, it obliges the supplier to apply good environmental practices.
Monitoring and outcomes:
-Reports of field visits - updated Contracts with suppliers

Country: Spain
Area/sub-scope:
Risk Assessment used:
☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:
2.2.1 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:
Land conversion may be authorized and therefore legal in some forests under specific regulations in Spain.
Mitigation measure:
Checkings have to be made lot by lot through satellite images interpretation of past years, back to 2008, as to assess wheter the land was forest in 2008 and it is no longer forest (for instance it is now a poplar plantation or agricultural land with scattered trees).
Monitoring and outcomes:
A proper checklist with Annex (containing collected evidence) is filled in for each lot; if a lot does not fulfill the requirement, it is not sourced as SBP.

Country: Spain
Area/sub-scope:
Risk Assessment used:
☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:
2.2.2 Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.
Description of the specific risk:
Possible interference of felling activities/TOF sourcing with ecosystems functions and services may occur.
Mitigation measure:
A visit on the field and technical evaluation by forestry engineer is performed before starting the wood sourcing as well as at the end of the work.
Monitoring and outcomes:
Duferco has implemented a control systems for all the works that consists of preliminary visits and field visits during the works, to verify that forest works are carried out properly. If some possible risk is detected,

Duferco, also through its suppliers, implements mitigation measures and records them in the paperwork.

Country: Spain	
Area/sub-scope:	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.3 Soil quality in the Supply Base shall be maintained or enhanced	
Description of the specific risk:	
According to the information in place, it can be established that the forestry maintenance operations in forest stands or plantations do not damage the soil significantly and that, within the framework of sustainable forest management and with appropriate environmental and forest management procedures, No significant damage to the soil is to be expected. However, mountain areas which cover a part of the supply base require a special attention in terms of erosion, that's why the BP undertakes number of specific measures to be sure that minimum impact is due to forestry operation. All evidence is recorded in a proper form. Same applies to TOF sourcing when entire trees are removed; it does not apply to pruning.	
Mitigation measure:	
Duferco and its suppliers only harvest timber from thinnings authorized from the forest authority, meaning that the forest engineer of the Forest authority made a preliminary visit to the forest to verify that key ecosystems and habitats were conserved and, if necessary, prescribed specific protective measures. There are contracts with suppliers, that obligate them to give Duferco a copy of the felling licence and also to perform works according to the manuals of good practices in sustainable forest management, with integrate measures to take care of soil quality. It means that soil quality in the supply base is maintained or enhanced: harvesting is carried out in a way that aims at least at preventing negative impacts on soil quality, as the relevant risks associated with forest biomass harvesting are identified in advance.	

Monitoring and outcomes:
Duferco has implemented a control systems for all the works that consists of preliminary visits and field visits during the works, to verify that forest works are carried out properly. If some possible risk is detected, Duferco, also through its suppliers, implements mitigation measures and records them in the paperwork.

Country: Spain
Area/sub-scope:
Risk Assessment used:
☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:
2.2.5 Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.
Description of the specific risk:
Quantity of ground water may be affected by forestry operations following drought, as forestry vehicles may impact on soil and temporarily waterproof it.
Mitigation measure:
Following the national and regional law and the authorization process requirements, these aspects are evaluated and rules are normally issued within the felling licence details, if applicable to the case. Field visits during and after the field work check the impact on water regulation in the field.
Monitoring and outcomes:
Duferco has implemented a control systems for all the forestry works that consists of preliminary visits and field visits during the forest works, to verify that forest works are carried out properly. If some possible risk is detected, Duferco, also through its suppliers, implements mitigation measures and records them in the paperwork.

Country: Spain	
Area/sub-scope:	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.10 Harvested areas shall be regenerated	
Description of the specific risk:	
As there is no specific enforced law about replantation for eucalyptus stands at the end of the cycle, there might be eucalyptus stands that are not re-planted at the end of the cycle.	
Mitigation measure:	
Duferco assures that a proper commitment by the land owner will be signed in the few cases where replantation is not assured.	
Monitoring and outcomes:	
If re-plantation is not assured, the lot is cast as non-eligible for SBP certification.	

Country: Spain	
Area/sub-scope:	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed

	☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.11 The impacts of natural processes such as fires, pests and diseases shall be managed.	
Description of the specific risk:	
With regards pests and diseases, Duferco relies on the existence of a clear, regulatory framework, action plans and data monitoring networks, and competent administrations responsible for data management and control. Therefore, it is generally considered that there is adequate pest and disease management in place, bearing in mind that a large part of the responsibility in this regard lies with public administrations. With regards forest fires, it cannot be denied that they currently represent one of the greatest threats to forests in Spain. Between 1990 and 2010, the annual average number of forest fires was 17,864, with a maximum of 25,557 in 1995. During the same period, the annual average area burned was 139,775 ha, of which approximately 51,000 ha were forested areas, and 88,000 ha were areas without trees. Climate change is expected to affect, and probably already does affect, the susceptibility of forests to disturbances, as well as the frequency, intensity, duration and timing of these disturbances. For example, there may be increased fuel accumulation in forests, the fire seasons may last for longer and more extreme weather conditions may occur more frequently. In addition, the frequency and intensity of forest fires is also expected to increase. The current trend is for forests to offer an increasingly dangerous vegetation structure in this regard, as they accumulate the fine biomass that was once used to cover livestock feed and heating requirements, and have a greater spatial continuity of forest fuel, taking into account the vegetation being installed in previously ploughed fields. The data for 2017 indicates that the total number of incidents has increased by 11.57% compared to the average for the last decade, with an increase of 5.80 % in the number of outbreaks (area ≤ 1 ha) and 23.05% in the number of fires (area > 1 ha) respectively. It was the year with the third highest number of incidents of the last decade. According to the provisional statistics provided by the competent services of the regional administrations, in 2017 there were 56 Major Forest Fires (MFFs), a category that includes fires exceeding 500 hectares of forest affected. In total the registered MFFs accounted for 54.96% of the total area affected and 0.41% of the total number of incidents. Northwest Spain was the area hit hardest by MFFs, with 73.21% of them taking place there and 74.54% of the area burned by them. In October alone, there were 31 MFFs (55% of the annual total), all in the Northwest region. According to the data, it seems that the recurrence of catastrophic years in terms of fires in Spain, is about every 5 years, the last two being 2012 (which affected Castilla y León and the Valencian Community in particular) and 2017 (which affected the Northwest of the peninsula in particular: Galicia, Asturias, León). At management level, a large extent of the responsibility for forest fires lies with public administrations. However, forest owners have certain responsibilities for the proper management of the forest and of fire prevention and defence infrastructures. The analysis of this indicator will focus on these issues, resulting from forestry operations. On forests management level we can make next classification:	

-Public forests. The administration itself is the manager of these forests and is therefore responsible for maintaining adequate defence and prevention infrastructure. In this respect, the level of implementation of these infrastructures can be considered adequate.

-Private forests. The existing legislation determines specific obligations or responsibilities of forest managers/owners concerning prevention/defence against forest fires.

In Andalusia the law requires the preparation of Forest Fire Prevention Plans or Management Plans and the implementation of the prevention/defence measures established either in this document or in the Plans drawn up by the administration.

In Aragon the Forest management covers a total forest area of 2.5 million hectares, representing 53% of the area of the Autonomous Community of Aragon. There is high priority for forest fires. The forestry administration produces the statement of the High Risk Areas. The time of danger of forest fires is established for the year 2019 during the period from 1 April to 15 October.

In Catalunya, a large part of the fire prevention activity is concentrated in the priority protection periods(PPP). The risk sectors or PPPs are territorial areas with a large forest fire peril and which, due to the continuity of the forest mass, may start fires that are converted into a large forest fire (GIF), defined here as more than 500 ha. The main objective is to plan the necessary measures in a territorial area that constitutes a unit of action broad enough to allow planning with an integral vision, so that the strategic prevention infrastructures for the whole are identified. The PPI is used as a basis for direct investment decisions that the Directorate General of the Natural Environment makes in the prevention of fires on the territory.

In Castilla- la Mancha fire is an actual issue; the responsible organ is the Dirección General de Política y Espacios Naturales.

In the Valencian Community the planning of the actions is carried out by the Generalitat Valenciana through the approval of forest fire sectoral plans and the possibility for municipalities to draw up local fire plans, subject to the sectoral plans. Forest land owners and local entities in areas at high risk of forest fires shall be obliged to adopt appropriate measures to prevent forest fires and shall carry out, at their own cost, the corresponding work in the manner, within the time limits and under the conditions established in the fire prevention plans.

In Murcia, the forestry administration produces the statement of the High Risk Areas, as well as approving the defence plans. These plans shall establish the preventive work to be carried out, including the appropriate forestry treatments, firebreak areas, access roads and water points to be carried out by the owners of the forests in the area, the execution timeframes, and the methods for executing the work, depending on the legal status of the land, by means of treaties, agreements, temporary assignments of the land to the Administration, aid or grants or, where appropriate, subsidiary execution by the Administration.

It is important to bear in mind that the work carried out by Duferco and its suppliers, which normally involves forest treatments, thinning and clearing, has a positive impact on the prevention of forest fires, as it reduces the density and biomass in the forest cover.

In fact, in many areas of the Valencian Community where work is being carried out, the impact of the work on the occurrence of forest fires has been very positive as the number has decreased significantly.

In general, these were forest areas that had undergone virtually no forest management in the last 30-40 years.

Duferco suppliers have implemented a Manual of good environmental practices, known to all its workers, which indicates the measures to be taken to prevent forest fires resulting from its work.

Furthermore, based on the levels of risk determined by the public administration, at times of highrisk forestry work is not permitted in the area.

The level of risk may be defined as:

1. Low risk for pest and disease management. 2. High risk for forest fires. However, during forest works the implementation of fire prevention measures by Duferco or the suppliers are standard operational procedures. If a pest or disease hits the forest, restrictions or measures are detailed in the felling licence. This means that impacts of natural processes such as fires, pests and diseases are managed.
Mitigation measure: Fire protection equipment are always present at the harvesting site in accordance with the legal requirements. Harvesting work is performed at the time that is allowed and announced by the Department of fire prevention. Manuals of good practices in sustainable forest management is applied.
Monitoring and outcomes: Duferco has implemented a control systems for all the forestry works that consists of preliminary visits and field visits during the forest works, to verify that forest works are carried out properly. If some possible risk is detected, Duferco, also through its suppliers, implements mitigation measures and records them in the paperwork.

Country: Spain	
Area/sub-scope:	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
3.2.3 feedstock shall not be sourced from forest areas in the Supply Base which, according to local definitions or norms, are classified as having combined attributes of high carbon stocks and high conservation value (HCV).	
Description of the specific risk:	

Feedstock may be sourced from areas that have both high carbon stocks and high conservation value(HCV). This may apply to forests and TOF lots.
Mitigation measure:
Evidence is collected for each lot using GRAS database (matching Biodiversity maps and carbon stockmaps). Checklist and related documents are crosschecked by Duferco's sustainability team.
Monitoring and outcomes:
If a lot has got high carbon stocks and high conservation value (HCV), it may be cast as non-eligible for SBP certification, unless there is a justification in the felling licence or other authorization that allows thefelling for specific reasons.

Country: Italy	
Area/sub-scope: Tuscany, Lazio, Emilia-Romagna, Lombardy, Veneto	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.1.2 Threats to and impacts on the identified key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified and evaluated.	
Description of the specific risk:	
Possible undetected interference with protected species, ecosystem or habitats may occur during felling operations/TOF sourcing.	
Mitigation measure:	
Preliminary verification of the presence of protected areas or Nature 2000 sites and verification of the correctness of the authorization procedure. Site inspection on the field and technical evaluation by forestry engineer has to be performed if forestry	

operations take place within the boundary of protected areas or Nature 2000 sites. All lots are cross-checked and verified by Duferco. The technician fills out an inspection report in which the carrying out company declares that the intervention was carried out in compliance with the requirements and that the personnel in charge of the inspection did not detect any infringement.

Monitoring and outcomes:

Duferco has implemented a control systems for all works that consists of preliminary visits and field visits during the works, to verify that forest works are carried out properly. If some possible risk is detected, Duferco, also through its suppliers, implements mitigation measures and records them in the paperwork.

Country: Italy

Area/sub-scope: Tuscany, Lazio, Emilia-Romagna, Lombardy, Veneto

Risk Assessment used:

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

Indicator with specified risk:

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

Description of the specific risk:

A felling licence may have been granted or harvesting may occur for a plot that was forest in January 2008 and then was deforested and re-forested or cropped afterwards.

Mitigation measure:

Evidence is collected by analysis of the aerial photography, portals and databases.

Monitoring and outcomes:

A proper checklist with Annex (containing collected evidence) is filled in for each lot; if a lot does not fulfill the requirement, it is not sourced as SBP.

Country: Italy	
Area/sub-scope: Tuscany, Lazio, Emilia-Romagna, Lombardy, Veneto	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.2 Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.	
Description of the specific risk:	
Possible interference may occur with ecosystems functions and services during forestry operations/TOF sourcing.	
Mitigation measure:	
A visit on the field and technical evaluation by forestry engineer is performed before starting the wood sourcing as well as at the end of the work.	
Monitoring and outcomes:	
Duferco has implemented a control systems for all the works that consists of preliminary visits and field visits during the works, to verify that forest works are carried out properly. If some possible risk is detected, Duferco, also through its suppliers, implements mitigation measures and records them in the paperwork.	

Country: Italy	
Area/sub-scope: Tuscany, Lazio, Emilia-Romagna, Lombardy, Veneto	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim

	☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.3 Soil quality in the Supply Base shall be maintained or enhanced	
Description of the specific risk:	
Soil quality may be affected by forestry operations/TOF sourcing.	
Mitigation measure:	
Duferco has implemented a control systems for all the forestry works that consists of preliminary visits and field visits during the forest works, to verify that forest works are carried out properly. The regional law and the authorization process requirements may issue rules about soil quality maintenance in the forests. Guidelines of the SKIDDFORW project detail rules about this and field visits are performed during and after the field work to check compliance to these guidelines.	
Monitoring and outcomes:	
If some possible risk is detected, Duferco, also through its suppliers, implements mitigation measures and records them in the paperwork.	

Country: Italy	
Area/sub-scope: Tuscany, Lazio, Emilia-Romagna, Lombardy, Veneto	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim

	☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.5 Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.	
Description of the specific risk:	
Quantity of ground water may be affected by works in the field, as forestry vehicles may impact on soil and temporarily waterproof it.	
Mitigation measure:	
Following the national and regional law and the authorization process requirements, these aspects are evaluated and rules are normally issued within the felling licence details, if applicable to the case. Field visits during and after the field work check the impact on water regulation in the field.	
Monitoring and outcomes:	
Duferco has implemented a control systems for all the forestry works that consists of preliminary visits and field visits during the forest works, to verify that forest works are carried out properly. If some possible risk is detected, Duferco, also through its suppliers, implements mitigation measures and records them in the paperwork.	

Country: Italy	
Area/sub-scope: Tuscany, Lazio, Emilia-Romagna, Lombardy, Veneto	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
3.2.3 feedstock shall not be sourced from forest areas in the Supply Base which, according to local definitions or norms, are classified as having combined attributes of high carbon stocks and high conservation value (HCV).	
Description of the specific risk:	

Feedstock may be sourced from areas that have both high carbon stocks and high conservation value (HCV).
Mitigation measure:
Evidence is collected for each lot using GRAS database (matching Biodiversity maps and carbon stock maps). Checklist and related documents are crosschecked by Duferco's sustainability team.
Monitoring and outcomes:
If a lot has got high carbon stocks and high conservation value (HCV), it may be cast as non-eligible for SBP certification, unless there is a justification in the felling licence that authorizes the felling for specific reasons.

Country: Italy
Area/sub-scope: Apulia
Risk Assessment used:
☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:
2.1.2 Threats to and impacts on the identified key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified and evaluated.
Description of the specific risk:
Olive trees are the key species for a peculiar area of HCV pertaining to landscape, but there is also a peculiar biodiversity related to the olive trees orchards, mainly insects and other fauna that may benefit from shadow and availability of sites of refuge amongst the olive trees and the dry stone walls, that often surround each orchard. Monumental olive trees enhance these benefits, as they are old trees with multiple ecological niches, more than the young olive trees. Besides, a few Nature 2000 sites (for instance Site code IT9120002 and Site code 9130005) also cover part of agricultural land, where olive trees orchard can be found, meaning that threats to biodiversity issues in

sourcing from these areas should be addressed and mitigation measures implemented.
Mitigation measure:
A visit on the field and technical evaluation by agronomist has to be performed if olive trees are eradicated within the boundary of Nature 2000 sites, also in relation to re-planting issues and dry stone walls preservation. Evidence is cross-checked and verified by Duferco's sustainability team. After 2-3 years from eradication, a sample of these lots should be re-visited, to verify if replantation was carried on properly.
Monitoring and outcomes:
If some possible risk is detected, Duferco, also through its suppliers, implements mitigation measures and records them in the paperwork.

Country: Italy
Area/sub-scope: Apulia
Risk Assessment used:
☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:
2.1.3 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.
Description of the specific risk:
A few hectares and plants belonging to private, small owners, that were infected and were eradicated, may not be re-planted, but, within the professional farmers' surfaces, the number of plants in replantations has been and will be increased, following the commitment of the Apulia Region that the number of olive trees plant will not decrease on provincial basis.
Mitigation measure:
There is no interest whatsoever to diminish the surface of olive trees, even where infection is spreading.

On the contrary, efforts at all levels, from the European Commission to the National government to the Regional authority, have been made and are made in order to contrast the infection and recreate the lost surface by re-planting.

The practical measure that increases the density of plants in the new plantation and re-plantation, due to the evolution of cropping to an higher density layout of trees, works as a strong mitigation measure.

Monitoring and outcomes:

A proper checklist is filled in for each lot; if a lot does not fulfill the requirement, it is not sourced as SBP.

Country: Italy

Area/sub-scope: Apulia

Risk Assessment used:

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

Indicator with specified risk:

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

Description of the specific risk:

An olive tree orchard may have been planted in a plot that was forest in January 2008.

Mitigation measure:

Evidence is collected by analysis of the satellite images before 2008.

Proper Annex of a document filled in by Duferco's sustainability team with evidence of images interpretation.

Monitoring and outcomes:

If a lot does not fulfill the requirement, it is not sourced as SBP.

Country: Italy	
Area/sub-scope: Apulia	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.2 Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.	
Description of the specific risk:	
The infection of Xylella in Apulia has caused an unwanted decrease of Ecosystem Services within the infected orchards.	
Mitigation measure:	
Replantation with resistant varieties and new plantations from other crops are indeed mitigation measures, as they restore and increase the number of plants per hectare, maintaining or enhancing in the long term the health, vitality, functions and services of the olive trees orchard agro-ecosystem. The practical measure that increases the density of plants in the new plantation and re-plantation, due to the evolution of cropping to a higher density layout of trees, works as a strong mitigation measure.	
Monitoring and outcomes:	
If re-plantation is not assured, the lot is cast as non-eligible for SBP certification.	

Country: Italy	
Area/sub-scope: Apulia	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim

	☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.3 Soil quality in the Supply Base shall be maintained or enhanced	
Description of the specific risk:	
Soil quality is affected by eradication and also by harrowing in specific areas, as several scientific studies show.	
Mitigation measure:	
Re-plantation compensates the loss of organic matter in the medium period and restores the protection of soil through canopy cover. Early harrowing is then followed by grass cover that restores the protection of the soil at a lower level and also the content of organic matter.	
Monitoring and outcomes:	
If re-plantation is not assured, the lot is cast as non-eligible for SBP certification.	

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

Indicator with specified risk:
2.2.4 Where the removal of harvest forest residues and/or stumps occurs, this shall not lead to irreversible negative impacts to the ecosystem.
Description of the specific risk:
Since Xylella can affect roots, all parts of infected plants have to be removed, including stumps and roots.
Mitigation measure:
It is not an irreversible negative impact, as new plants are re-planted in the lacking spots, often in higher density then before the eradication, due to new standards in cropping. Organic manure is spread as a common practice in new planting, restoring some content of organic matter in the soil. The negative impact to the ecosystem is then reversible.
Monitoring and outcomes:
If re-plantation is not assured, the lot is cast as non-eligible for SBP certification.

Country: Italy
Area/sub-scope: Apulia
Risk Assessment used:
☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:
2.2.5 Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.
Description of the specific risk:
Quantity of ground water may be affected by eradication of olive trees, according to a recent scientific study.
Mitigation measure:
Re-plantation and also irrigation of the new cultivar plantation (mostly "Leccino") are becoming common, contrasting the lack of water in the soil during summer. There are grants for professional farmers that are given to implement irrigation (through the Rural

Development Plan of Apulia Region, Submeasure 4.1.A).
Monitoring and outcomes:
If re-plantation is not assured, the lot is cast as non-eligible for SBP certification.

Country: Italy
Area/sub-scope: Apulia
Risk Assessment used:
☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:
2.2.10 Harvested areas shall be regenerated
Description of the specific risk:
A few hectars and plants belonging to private, small owners, that were infected and were eradicated, may not be re-planted, but, within the professional farmers' surfaces, the number of plants in replantations has been and will be increased, following the commitment of the Apulia Region that the number of olive trees plant will not decrease on provincial basis.
Mitigation measure:
There is no interest whatsoever to diminish the surface of olive trees, even if infection is spreading. On the contrary, efforts at all levels, from the European Commission to the National government to the Regional authority, have been made and are made in order to contrast the infection and recreate the lost surface by re-planting. The practical measure that increases the density of plants in the new plantation and re-plantation, due to the evolution of cropping to an higher density layout of trees, works as a strong mitigation measure.
Monitoring and outcomes:
If re-plantation is not assured, the lot is cast as non-eligible for SBP certification.

Country: Italy	
Area/sub-scope: Apulia	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
4.1.2 Forced or compulsory labour shall not be used.	
Description of the specific risk:	
Illegal employment may be a form of forced labour, as illegal workers have no rights. In agriculture in Apulia this problem may occur.	
Mitigation measure:	
Duferco checks documents of legal employment related to workers of its suppliers.	
Monitoring and outcomes:	
If legal requirements for all workers are not assured, the supplier is temporarily invalidated until the problem is solved, otherwise the feedstock is not sourced.	

4 Stakeholder engagement

4.1 General description

Biomass Producer's stakeholder engagement start date: 03 Mar 2026

Biomass Producer's stakeholder engagement end date: 03 Apr 2026

Total number of stakeholders contacted: 151

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

A stakeholders list was produced, sorted by State/Region and category and stakeholders were engaged through mails and direct telling.

4.2 Response to stakeholder comments

5 Report updates and approval

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

Three Regions in Italy were added to the SB (Emilia-Romagna, Lombardy, and Veneto).

Name	Luca POLI
Title	Management representative
Date of report approval	12 Feb 2026

Annex 1: Detailed findings for Supply Base Evaluation indicators

Spain 6 regions in East and South Spain	Indicator
1.1.1	Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.
Supply Base Verifiers	- Resolutions of the Ministerial Conferences for the Protection of Forests in Europe of Forest Europe - Resolution of the European Parliament 31st January 1997 - COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS New EU Forest Strategy for 2030 - The Spanish Forest Law: Ley 43/2003, 21 November, de Montes: https://www.boe.es/buscar/act.php?id=BOE-A-2003-21339 COSE report (MAPAMA, 2013): https://www.mapa.gob.es/es/desarrollorural/temas/politicaforestal/control_cortas_de_madera_espanya_2012_tcm30-152390.pdf Real Estate Cadastre: http://www.catastro.meh.es/ http://www.sedecatastro.gob.es/ - FSC National Risk Assessment for Spain 2018 "Registro nacional de empresas" https://www.registradores.org/el-colegio/registro-mercantil
Risk Rating justification	At national level, the Forestry Administration is located within the Ministry of Ecological Transition and Demographic Increment (Ministerio para la Transición Ecológica y el reto demográfico) at the national/State level, which is responsible for basic legislation and planning of national affairs. Autonomous Communities in Spain have their respective forestry authorities, which take care of forest resources on the ground at the legal level and planning at the operational level. The Forestry Law (Law 43/2003, of 21 November, on Forests, Law 10/2006, of 28 April, and Law 21/2015, of 20 July, which amends Law 43/2003), Chapter IV states that: -When a Management or Equivalent Plan exists, or the forest is included within the scope of a PORF (Forest Resources Management Plan), the holder must notify the competent body of the Autonomous Community before the harvest as the authority (Conselleria de Medio Ambiente) has already approved the Forest Management Plan with a proper approval document; -In other cases, administrative authorisation is required before harvesting. In both public and private forests, forestry operations are subject to supervision by personnel from the Public Authority. In public forests, approval of harvesting operations must be given by the Forestry Service of the Autonomous Community. Authorization for Harvesting is issued by the authorities and provided to the company that is

selected to perform the harvesting operations.

In private forests, before the harvesting operations commence, the owners have to send an authorization request to the Forest Service about the planned forestry operations. Based on the authorization request, the government approves or rejects the planned work. In case of approval, they issue Authorization for Harvesting to the owner, which defines exactly which kind of forest work can be done and at this territory (specifying the geographical coordinates and the characteristics of the harvesting).

Duferco and its suppliers obtains feedstock both from public and private areas. In all cases, a contract with the seller is closed. According to the contract, the Authorization for Harvesting needs to be provided to Duferco, also through its suppliers, before the deliveries, or the approved Forest Management Plan with the notification. Relevant documentation is specified in the table below for every region is the supply base.

Otherwise, the wood cannot be supplied.

In case of work with suppliers, who are the middlemen between the Duferco and the owner, the Authorization for Harvesting obtained by the owner has to be provided. In some cases, suppliers consider this to be commercially sensitive information and they are not ready to provide the Authorization for Harvesting, but only the number of the document. In these cases, Duferco does not accept the wood. The approved Forest Management Plan, if available, including a notification, also needs to be presented by the supplier. Otherwise the contract is not signed by Duferco, also through its suppliers.

COSE (the Spanish Confederation of Forestry Organisations) concludes that the degree of control by the forestry authority is high, or very high in all the Autonomous Communities except in Galicia, where the level of control is considered to be medium high (MAPAMA, 2013).

Cadastral information exists throughout the whole country (Ministry of Finance and Public Administration). All properties are given a unique cadastral reference number that allows them to be identified and located. The cadastral reference number is linked to a cadastral map.

The risk is considered low, due to:

- Availability of clear cadastral data in Spain;
- A high level of supervision on harvesting operations by the regional governments;
- Duferco demands the supplier submits the official felling licence;

Delivery documents available for every delivery.

As for TOF Agricultural land (3A): pruning and collecting shoots from Short Rotation Coppice are not regulated by specific laws, but as they are agricultural activities, the companies are due by law to be enlisted in the "Registro nacional de empresas" that includes active farmers.

The first public register of active farmers was created in 2014 with views to recognize "the green farmers" beneficiaries of the economic grants by the EU. Since 2023 it was replaced by the national register of companies which includes all civil or mercantile companies Without exception, in agricultural matters, the form of the registered exploits will be mentioned "business managed by an active farmer".

	Legislation related to labour rights and Health and Safety apply to all agricultural works, but also in this case the SBP indicators related to principle 4 analyze the matter and the same rules apply for forestry and agriculture.
Risk Rating	Low Risk

Italy Tuscany	Indicator
1.1.1	Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.
Supply Base Verifiers	-EU Resolutions of the Ministerial Conferences for the Protection of Forests in Europe of Forest Europe -EU Resolution of the European Parliament 31st January 1997 -COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS New EU Forest Strategy for 2030 The Forestry Administration is located within the Ministry of Agriculture, Food sovereignty and Forests (MASAF) at the national/State level, which is responsible for basic legislation and planning of national affairs. National law: - Law Decree no. 34/2008 ("Testo unico in materie di foreste e filiere forestali") - Presidential Decree no. 11/1972, that delegates to Regions all administrative functions in agriculture and forestry ("Trasferimento alle Regioni a statuto ordinario delle funzioni amministrative statali in materia di agricoltura e foreste, di caccia e di pesca nelle acque.) Regional laws and application of laws: -Regional Forestry Law no. 39/2000 https://raccoltanormativa.consiglio.regione.toscana.it/articolo?urndoc=urn:nir:regione.toscana:legge:2000-03-21;39 - Regional Forestry Regulation D.P.G.R. 48/R/2003 https://raccoltanormativa.consiglio.regione.toscana.it/articolo?urndoc=urn:nir:regione.toscana:regolamento.giunta:2003-08-08;48/R Tuscany Region has delegated the forestry administrative duties to Unione dei Comuni (municipalities association) or to Città Metropolitana di Firenze which are the bodies responsible for the territory management. All the wood harvesting declarations or authorizations are issued by public bodies. In case of approval, they issue a felling licence, which defines exactly which kind of forest work can be done and identify the spatial boundaries (specifying the geographical area and how harvesting has to be performed). The public forest surfaces, both as regional and state property, are managed according to Forest Management Plans and all the batches are assigned through public tenders. TOF National Law no. 580/1993 https://www.normattiva.it/urires/

	N2Ls?urn:nir:stato:legge:1993-12-29;580!vig=D.P.R. 7/12/1995 n. 581 https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:legge:1993-12-29;580 Farm file: Legislative Decree No. 99/2004 https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:decreto.legislativo:2004-03-29;99~art1 National Law no. 10/2013, Rules for the development of urban green spaces https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:legge:2013;10
Risk Rating justification	Duferco and its suppliers obtains feedstock both from public and private forests. In all cases, a contract with the seller is signed. According to the contract, the felling licence or the approved Forest Management Plan (including notification) needs to be provided to Duferco, also through its suppliers, before deliveries start. Duferco buys forests directly from owners or through suppliers. In the first case, Duferco obtains all the authorizations required by the regional and national laws and the technician guarantees the rightfulness before the works beginning. At the same time Duferco, thanks to its technicians, verifies the accuracy of the authorizations. In the case of batches bought directly from suppliers, these have to send all the mandatory documents to Duferco so that it's clear that the standing trees or timber have been bought with a regular contract and that all the authorizations have been issued. The supply batch within Duferco's management platform is created only after all documents are collected and checked. As for TOF Urban and landscape (2A): sourcing trees from landscape or gardens is not covered by specific laws, but usually these kinds of works are performed by agricultural workers (see also next paragraph about legal requirements for farmers) or by gardeners. In any case all legislation related to labour rights and Health and Safety apply; the SBP indicators related to principle 4 analyze the matter and the same rules apply for forestry and agriculture. When trees are cut along roads or other infrastructures, such as power lines, aqueducts, channels, etc., the works are due to a specific order by the mayor of the town/city or by the general manager of the Regional or National body that is in charge of regional/national roads or other infrastructures. The same rule may apply to trees or even branches of trees of private properties that lean over public soil, as the mayor can order their removal for public safety. National Law no. 10/2013 rules about development of urban green spaces and establishes that only municipalities issue and oversee specific orders. The specific rules will therefore be detailed in each municipal regulation, if any, or otherwise in the Civil Codes articles 892, 893, 894, 895 and 896. Art. 892 rules about the minimum distances to be respected for planting trees near boundaries; art. 896 regulates the right of neighbors to cut branches or roots that extend onto their property; art. 893 details rules for planting trees on roads, canals, or forest edges; art. 894 allows the cutting of trees planted at an illegal distance; art. 895 prohibits replanting trees at an illegal distance. As for TOF Agricultural land (3A): pruning and collecting shoots from Short Rotation Coppice are not regulated by specific laws, but as they are agricultural activities, the companies are due by law to be enlisted in the local Chamber of Commerce (National Law no. 580/1993) that provides evidence

	of registration and activities allowed. The document of registration is called “Visura CCIAA”. Farmers are also required to register at local union offices, which fill in the Farm file (“Fascicolo aziendale”), that enlists all crops in relation to cadaster, property rights, land use (to be “validated” each year for records of changing crops). National legislation on the Farm file is ruled by Legislative Decree No. 99/2004, which establishes that it is the mandatory tool for farmers to provide evidence of primary agricultural activity, that is a condition to access European and national funding. In the Farm file all information about the company, the crops, the production assets are detailed in a declaration form; the update is due every year in the National Agricultural Information System (SIAN). Legislation related to labour rights and Health and Safety apply to all agricultural works, but also in this case the SBP indicators related to principle 4 analyze the matter and the same rules apply for forestry and agriculture.
Risk Rating	Low Risk

Italy Apulia	Indicator
1.1.1	Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.
Supply Base Verifiers	<i>Xylella fastidiosa</i> is regulated in the EU as quarantine pest under Regulation (EU) 2016/2031 ('Plant Health Law') on protective measures against plant pests. Its introduction into and spreading within all Member States is banned. In case of detection, irrespective of the symptoms and subspecies concerned, all necessary measures shall be taken to eradicate it, or in case of approval by Commission Regulation, to inhibit its further spread if eradication is no longer achievable. The following Commission Implementing Regulation (EU) 2020/1201 of 14 August 2020 regards measures to prevent the introduction into and the spread within the Union of <i>Xylella fastidiosa</i>. National law: MIPAF Ministry Decree date January 24th 2022 concerning the endorsement of a national Plan of emergency measures for <i>Xylella</i> (“Adozione del Piano di emergenza nazionale per il contrasto di <i>Xylella fastidiosa</i>”), descending from the previous national Law n. 144/1951, that provides protection for all olive trees. Regional laws and application of laws: Regional Law n. 4/2017 “Management of bacteriosis from <i>Xylella fastidiosa</i> in the Apulian Region”. Several Decrees of the Manager of Phytosanitary Observatory: last Decree was issued in April 24th 2024, n. 45, regarding: “Update of <i>Xylella fastidiosa</i> subspecies <i>fastidiosa</i> ST1 infected area in application of EU Reg. 2020/1201.”

Risk Rating justification	The eradication of infected plants and other plants around them within the boundaries of the infected area, as identified in the last available update, is justified on the ground of EU Regulations, national law and regional law. Grants are given to compensate expenses of re-planting.
Risk Rating	Low Risk

Italy Lazio	Indicator
1.1.1	Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.
Supply Base Verifiers	EU Resolutions of the Ministerial Conferences for the Protection of Forests in Europe of Forest Europe - Resolution of the European Parliament 31st January 1997 - COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS New EU Forest Strategy for 2030 The Forestry Administration is located within the Ministry of Agriculture, Food sovereignty and Forests (MASAF) at the national/State level, which is responsible for basic legislation and planning of national affairs. National law: - Law Decree no. 34/2018 ("Testo unico in materie di foreste e filiere forestali") - Presidential Decree no. 11/1972, that delegates to Regions all administrative functions in agriculture and forestry ("Trasferimento alle Regioni a statuto ordinario delle funzioni amministrative statali in materia di agricoltura e foreste, di caccia e di pesca nelle acque.) Regional laws and application of laws: - Regional Forestry Law no. 39/2002 https://www.regione.lazio.it/sites/default/files/documentazione/AGC-Legge-Regionale-39-28-10-2002.pdf - Regional Forestry Regulation no.7/2005 https://www.regione.lazio.it/regolamenti-regionali-testooriginale/regolamento-regionale-18-aprile-2005-n-7 TOF National Law no. 580/1993 https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:legge:1993-12-29;580!vig=D.P.R.7/12/1995n.581 https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:legge:1993-12-29;580 Farm file: Legislative Decree No. 99/2004 https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:decreto.legislativo:2004-03-29;99~art1 National Law no. 10/2013, Rules for the development of urban green spaces https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:legge:2013;10
Risk Rating justification	Duferco and its suppliers obtains feedstock both from public and private

forests. In all cases, a contract with the seller is signed. According to the contract, the felling licence or the approved Forest Management Plan (including notification) needs to be provided to Duferco, also through its suppliers, before deliveries start.

Duferco buys forests directly from owners or through suppliers. In the first case, Duferco obtains all the authorizations required by the regional and national laws and the technician guarantees the rightfulness before the works beginning. At the same time Duferco, thanks to its technicians, verifies the accuracy of the authorizations. In the case of batches bought directly from suppliers, these have to send all the mandatory documents to Duferco so that it's clear that the standing trees or timber have been bought with a regular contract and that all the authorizations have been issued. The supply batch within Duferco's management platform is created only after all documents are collected. The Lazio Region has delegated the forestry administrative duties to Provinces for surfaces greater than three hectares and to Municipalities in case of surfaces less than three hectares.

For the forestry operations execution, a works commencement notification is needed. This document has to certify the compliance with the national and regional laws as well as with the territorial planning. If there are no integrations requests nor clearances are required from bodies responsible for protected areas, sixty days after the communication forestry operations can start. At the end of the works an end communication has to be sent to the Forestry Police. checked and checked.

Lazio Region has delegated the forestry administrative duties to Provinces for surfaces greater than three hectares and to Municipalities in case of surfaces less than three hectares.

For the forestry operations execution, a works commencement notification is needed. This document has to certify the compliance with the national and regional laws as well as with the territorial planning. If there are no integrations requests nor clearances are required from bodies responsible for protected areas, sixty days after the communication forestry operations can start. At the end of the works an end communication has to be sent to the Forestry Police.

As for TOF Urban and landscape (2A): sourcing trees from landscape or gardens is not covered by specific laws, but usually these kinds of works are performed by agricultural workers (see also next paragraph about legal requirements for farmers) or by gardeners. In any case all legislation related to labour rights and Health and Safety apply; the SBP indicators related to principle 4 analyze the matter and the same rules apply for forestry and agriculture.

When trees are cut along roads or other infrastructures, such as power lines, aqueducts, channels, etc., the works are due to a specific order by the mayor of the town/city or by the general manager of the Regional or National body that is in charge of regional/national roads or other infrastructures. The same rule may apply to trees or even branches of trees of private properties that lean over public soil, as the mayor can order their removal for public safety. National Law no. 10/2013 rules about development of urban green spaces

	and establishes that only municipalities issue and oversee specific orders. The specific rules will therefore be detailed in each municipal regulation, if any, or otherwise in the Civil Codes articles 892, 893, 894, 895 and 896. Art. 892 rules about the minimum distances to be respected for planting trees near boundaries; art. 896 regulates the right of neighbors to cut branches or roots that extend onto their property; art. 893 details rules for planting trees on roads, canals, or forest edges; art. 894 allows the cutting of trees planted at an illegal distance; art. 895 prohibits replanting trees at an illegal distance. As for TOF Agricultural land (3A): pruning and collecting shoots from Short Rotation Coppice are not regulated by specific laws, but as they are agricultural activities, the companies are due by law to be enlisted in the local Chamber of Commerce (National Law no. 580/1993) that provides evidence of registration and activities allowed. The document of registration is called "Visura CCIAA". Farmers are also required to register at local union offices, which fill in the Farm file ("Fascicolo aziendale"), that enlists all crops in relation to cadaster, property rights, land use (to be "validated" each year for records of changing crops). National legislation on the Farm file is ruled by Legislative Decree No. 99/2004, which establishes that it is the mandatory tool for farmers to provide evidence of primary agricultural activity, that is a condition to access European and national funding. In the Farm file all information about the company, the crops, the production assets are detailed in a declaration form; the update is due every year in the National Agricultural Information System (SIAN). Legislation related to labour rights and Health and Safety apply to all agricultural works, but also in this case the SBP indicators related to principle 4 analyze the matter and the same rules apply for forestry and agriculture.
Risk Rating	Low Risk

Italy Emilia-Romagna	Indicator
1.1.1	Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.
Supply Base Verifiers	Regional laws and application of laws: -Regional Forestry Law no. 30/1981 https://demetra.regione.emilia-romagna.it/al/articolo?urn=er%3Aassemblealegislativa%3Alegge%3A1981%3B30 - Regional Forestry Regulation no. 3/2018 https://demetra.regione.emilia-romagna.it/al/articolo?urn=er%3Aassemblealegislativa%3Aregolamento%3A2018%3B3&dl_t=text%2Fxml&dl_a=y&dl_id=11&idx=prt2

Risk Rating justification	Emilia-Romagna Region has delegated forestry administrative duties to Unione dei Comuni (municipalities association) which are the public bodies in charge of land management. All authorizations related to wood sourcing are issued by these public entities. Authorization for Harvesting is issued to the owner, and it defines exactly the kind of forest work, how harvesting has to be performed and the spatial boundaries (specifying the geographical area through cadastral reference). The public forests, both regional and state, are managed according to Forest Management Plans and all the stands are assigned through public tenders.
Risk Rating	Low Risk

Italy Lombardy	Indicator
1.1.1	Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.
Supply Base Verifiers	-EU Resolutions of the Ministerial Conferences for the Protection of Forests in Europe of Forest Europe -EU Resolution of the European Parliament 31st January 1997 -COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS New EU Forest Strategy for 2030 The Forestry Administration is located within the Ministry of Agriculture, Food sovereignty and Forests (MASAF) at the national/State level, which is responsible for basic legislation and planning of national affairs. National law: - Law Decree no. 34/2008 ("Testo unico in materie di foreste e filiere forestali") - Presidential Decree no. 11/1972, that delegates to Regions all administrative functions in agriculture and forestry ("Trasferimento alle Regioni a statuto ordinario delle funzioni amministrative statali in materia di agricoltura e foreste, di caccia e di pesca nelle acque.) Regional laws and application of laws: Regional law no. 31/2008 (Testo unico delle leggi regionali in materia di agricoltura, foreste, pesca e sviluppo rurale) https://www.regione.lombardia.it/wps/portal/istituzionale/HP/DettaglioReazionale/servizi-e-informazioni/imprese/imprese-agricole/boschi-e-foreste/normativa-boschi-e-foreste/legge-forestale-regionale/legge-forestale-regionale Regionali regulation no. 5/2007 https://www.regione.lombardia.it/wps/portal/istituzionale/HP/DettaglioReazionale/servizi-e-informazioni/imprese/imprese-agricole/boschi-e-foreste/normativa-boschi-e-foreste/norme-forestali-regionali/norme-forestali-regionali

Risk Rating justification	The Consolidated Regional Law No. 31/2008 was consequent to Regional Law No. 27/2004 that rules about protection and enhancement of forests, environment, landscape, and related economy; it rules about management of forests, based on principles established by European Union ruling about biodiversity and sustainable development. It also considers economic aspects linked to managing activities and it aims to fight the lack of managing of forest in Lombardy, especially in the mountains, where it can negatively affect slope stability. In this matter it establishes measures to involve public and private forest owners. The Regional Forestry Regulation (R.R. no. 5/2007) details specific rules about forest general protection, as well as local traditional economies linked to sourcing according to good forest management. Any sourcing activity must fulfil a notification or even a specific harvesting permit (with project approved) if the activity takes places within a zone with specific environmental protection, such as regional parks and natural reserves that have no FM plan. Regional Forestry Regulation no. 5/2007 establishes the following permits may apply: - permit coming from tacit consent after 45 days for forest activities within natural parks or nature reserves; - permit coming from tacit consent after 60 days for silvicultural activities in seed forests; - certified notification of activity, immediately effective in all cases. Depending on the case a survey or project should be submitted to the application, to show that the following rules were endorsed: - trees releasing for indefinite aging; - selective or partial cutting to improve or let natural regeneration of the forest; - contrast to exotic invasive species and autochthonous species protection for biodiversity; - specific requirements for "Natura 2000" sites; compliance with these requirements ensures avoiding the procedure of impact assessment; - technical requirements for working along power lines, buildings surroundings, roads; - temporary storage areas and temporary forestry tracks; - rules about cable logging; - details of emergency interventions.
Risk Rating	Low Risk

Italy Veneto	Indicator
1.1.1	Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.
Supply Base Verifiers	-EU Resolutions of the Ministerial Conferences for the Protection of Forests in Europe of Forest Europe

	https://foresteurope.org/about/ -EU Resolution of the European Parliament 31st January 1997 -COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS New EU Forest Strategy for 2030 The Forestry Administration is located within the Ministry of Agriculture, Food sovereignty and Forests (MASAF) at the national/State level, which is responsible for basic legislation and planning of national affairs. National law: - Law Decree no. 34/2008 ("Testo unico in materie di foreste e filiere forestali") - Presidential Decree no. 11/1972, that delegates to Regions all administrative functions in agriculture and forestry ("Trasferimento alle Regioni a statuto ordinario delle funzioni amministrative statali in materia di agricoltura e foreste, di caccia e di pesca nelle acque.) Regional laws and application of laws: -Regional Forestry Law no. 52/78 https://www.consiglio Veneto.it/web/crv/dettaglio-legge?catStruttura=LR&anno=1978&numero=52&tab=vigente - Regional Forestry Regulation n. 2/2020 https://bur.regione.veneto.it/BurVServices/pubblica/DettaglioRegolamento.aspx?id=413790 - Operational handbook for forest management DGR 7/2018 https://www.regione.veneto.it/c/document_library/get_file?uuid=8fdc06d8- https://www.regione.veneto.it/web/agricoltura-e-foreste/normativa-forestale TOF National Law no. 580/1993 https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:legge:1993-12-29;580!vig=D.P.R.7/12/1995n.581 https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:legge:1993-12-29;580 Farm file: Legislative Decree No. 99/2004 https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:decreto.legislativo:2004-03-29;99~art1 National Law no. 10/2013, Rules for the development of urban green spaces https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:legge:2013;10
Risk Rating justification	Duferco and its suppliers obtains feedstock both from public and private forests. In all cases, a contract with the seller is signed. According to the contract, the felling licence or the approved Forest Management Plan (including notification) needs to be provided to Duferco, also through its suppliers, before deliveries start. Duferco buys forests directly from owners or through suppliers. In the first

case, Duferco obtains all the authorizations required by the regional and national laws and the technician guarantees the rightfulness before the works beginning. At the same time Duferco, thanks to its technicians, verifies the accuracy of the authorizations. In the case of batches bought directly from suppliers, these have to send all the mandatory documents to Duferco so that it's clear that the standing trees or timber have been bought with a regular contract and that all the authorizations have been issued.

The supply batch within Duferco's management platform is created only after all documents are collected and checked.

As for TOF Urban and landscape (2A): sourcing trees from landscape or gardens is not covered by specific laws, but usually these kinds of works are performed by agricultural workers (see also next paragraph about legal requirements for farmers) or by gardeners. In any case all legislation related to labour rights and Health and Safety apply; the SBP indicators related to principle 4 analyze the matter and the same rules apply for forestry and agriculture.

When trees are cut along roads or other infrastructures, such as power lines, aqueducts, channels, etc., the works are due to a specific order by the mayor of the town/city or by the general manager of the Regional or National body that is in charge of regional/national roads or other infrastructures. The same rule may apply to trees or even branches of trees of private properties that lean over public soil, as the mayor can order their removal for public safety. National Law no. 10/2013 rules about development of urban green spaces and establishes that only municipalities issue and oversee specific orders. The specific rules will therefore be detailed in each municipal regulation, if any, or otherwise in the Civil Codes articles 892, 893, 894, 895 and 896.

Art. 892 rules about the minimum distances to be respected for planting trees near boundaries; art. 896 regulates the right of neighbors to cut branches or roots that extend onto their property; art. 893 details rules for planting trees on roads, canals, or forest edges; art. 894 allows the cutting of trees planted at an illegal distance; art. 895 prohibits replanting trees at an illegal distance.

As for TOF Agricultural land (3A): pruning and collecting shoots from Short Rotation Coppice are not regulated by specific laws, but as they are agricultural activities, the companies are due by law to be enlisted in the local Chamber of Commerce (National Law no. 580/1993) that provides evidence of registration and activities allowed. The document of registration is called "Visura CCIAA".

Farmers are also required to register at local union offices, which fill in the Farm file ("Fascicolo aziendale"), that enlists all crops in relation to cadaster, property rights, land use (to be "validated" each year for records of changing crops).

National legislation on the Farm file is ruled by Legislative Decree No. 99/2004, which establishes that it is the mandatory tool for farmers to provide evidence of primary agricultural activity, that is a condition to access European and national funding. In the Farm file all information about the company, the crops, the production assets are detailed in a declaration form; the update is due every year in the National Agricultural Information System (SIAN).

	Legislation related to labour rights and Health and Safety apply to all agricultural works, but also in this case the SBP indicators related to principle 4 analyze the matter and the same rules apply for forestry and agriculture.
Risk Rating	Low Risk

Italy Emilia-Romagna	Indicator
1.1.2	Legal ownership of land and resource use rights shall be respected.
Supply Base Verifiers	Duferco verifies the legal ownership of land and resources through: - data regarding the cadastral reference of the forest lot, that are mandatory in the felling application; - sale contract that is signed by owner/manager to sell to Duferco's supplier and then another contract is signed by Duferco's supplier to sell to Duferco with attached all the signatories' ID documents; - existence of the farm file ("Fascicolo aziendale") that is mandatory for professional farmers/land owners regarding actual land use in each cultural unit for each year.
Risk Rating justification	Legal rights are always respected as the cadastre reference is provided in every step of the process and the cadastral unit is referred to the owner. Duferco asks for sale contracts and verifies them. In order to do that, Duferco requests the land registry ("visura catastale") to the owners or verifies directly through the web service SISTER ("Portale Catastale dell'Agenzia delle Entrate") the correct land heading. According to D.M. 02/03/2010 in case of Short Rotation Forestry or similar or of fieldwork remains it's mandatory that the cadastral units of each owner/land manager are also listed in the farm file ("Fascicolo aziendale") in most cases, with information about actual surface of each unit interested by forest. The farm file is composed by all the documents and information related to farms in Emilia-Romagna and it's available on the online platform called AGREA. If the farm file ("Fascicolo aziendale") is not present (small land owner that are not professional farmers), records of property can be collected through other legal documents.
Risk Rating	Low Risk

Italy Lazio	Indicator
1.1.2	Legal ownership of land and resource use rights shall be respected.
Supply Base Verifiers	Duferco verifies the legal ownership of land and resources through: - data regarding the cadastral reference of the forest lot, that are mandatory

	in the felling application; - sale contract that is signed by owner/manager to sell to Duferco's supplier and then another contract is signed by Duferco's supplier to sell to Duferco with attached all the signatories' ID documents; - existence of the farm file ("Fascicolo aziendale") that is mandatory for professional farmers/land owners regarding actual land use in each coltural unit for each year. Farm file: Legislative Decree No. 99/2004 https://www.normattiva.it/urires/N2Ls?urn:nir:stato:decreto.legislativo:2004-03-29;99~art1
Risk Rating justification	Legal rights are always respected as the cadastre reference is provided in every step of the process and the cadastral unit is referred to the owner. Duferco asks for sale contracts and verifies them. In order to do that, Duferco requests the land registry ("visura catastale") to the owners or verifies directly through the web service SISTER ("Portale Catastale dell'Agenzia delle Entrate") the correct land heading. According to D.M. 02/03/2010 in case of Short Rotation Forestry or similar or of fieldwork remains it's mandatory that the cadastral units of each owner/land manager are also listed in the farm file ("Fascicolo aziendale") in most cases, with information about actual surface of each unit interested by forest. The farm file is composed by all the documents and information related to Lazio farms and it's available on the online platform called SIAN (Sistema Informativo Agricolo Nazionale). If the farm file ("Fascicolo aziendale") is not present (small land owner that are not professional farmers), records of property can be collected through other legal documents. This is applicable to all Groups, Forest and TOF: 1A, 2A, 3A.
Risk Rating	Low Risk

Italy Apulia	Indicator
1.1.2	Legal ownership of land and resource use rights shall be respected.
Supply Base Verifiers	- Data regarding the cadastral reference of the eradication lot, the number of plants, the ownership are recorded in the mandatory annex of the "Application of eradication" (named "Allegato B"). - sale contract that is signed by owner/manager to sell to Duferco's supplier and then another contract is signed by Duferco's supplier to sell to Duferco. - existence of the farm file ("Fascicolo aziendale") that is mandatory for professional farmers regarding actual land use in each coltural unit each year.
Risk Rating justification	Legal rights are always respected as the cadastre reference is provided in every step of the process, referring also to the regional cadastral registry of infected olive trees named "Catasto olivicolo delle aree infette", that is public on the basis of the cadastral unit ("particella"). The cadastral units of each farm are also listed in the farm file ("Fascicolo aziendale") with information about actual surface of each unit interested by olive trees.

Risk Rating	Low Risk
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Italy Tuscany	Indicator
1.1.2	Legal ownership of land and resource use rights shall be respected.
Supply Base Verifiers	Duferco verifies the legal ownership of land and resources through: - data regarding the cadastral reference of the forest lot, that are mandatory in the felling application; - sale contract that is signed by owner/manager to sell to Duferco's supplier and then another contract is signed by Duferco's supplier to sell to Duferco with attached all the signatories' ID documents; - existence of the farm file ("Fascicolo aziendale") that is mandatory for professional farmers/land owners regarding actual land use in each coltural unit for each year.
Risk Rating justification	Legal rights are always respected as the cadastre reference is provided in every step of the process and the cadastral unit is referred to the owner. Duferco asks for sale contracts and verifies them. In order to do that, Duferco requests the land registry ("visura catastale") to the owners or verifies directly through the web service SISTER ("Portale Catastale dell'Agenzia delle Entrate") the correct land heading. According to D.M. 02/03/2010 in case of Short Rotation Forestry or similar or of fieldwork remains it's mandatory that the cadastral units of each owner/land manager are also listed in the farm file ("Fascicolo aziendale") in most cases, with information about actual surface of each unit interested by forest. The farm file is composed by all the documents and information related to Tuscany farms and it's available on the online platform called ARTEA (Agenzia Regionale Erogazioni in Agricoltura). If the farm file ("Fascicolo aziendale") is not present (small land owner that are not professional farmers), records of property can be collected through other legal documents. This is applicable to all Groups, Forest and TOF: 1A, 2A, 3A.
Risk Rating	Low Risk

Spain 6 regions in East and South Spain	Indicator
1.1.2	Legal ownership of land and resource use rights shall be respected.
Supply Base Verifiers	Duferco verifies the legal ownership of land and resources through: - Contract with the private owner or an agreement with a public authority. - Contract with suppliers - Felling licences - Cadastre https://www.sedecatastro.gob.es/

	Property Register: https://registropropiedad.derecho.com FSC National Risk Assessment for Spain 2018
Risk Rating justification	Every property in Spain must be registered in the Real Estate Cadastre and can be registered voluntary in the Property Register. However registration in the Cadastre is considered enough, since ownership is not a conflict topic. The FSC National Risk Assessment for Spain (2018) states: "Real Estate Cadastre - registration is compulsory and free. The cadastral description includes the physical, legal and economic characteristics of the property: its location, cadastral reference, surface area, use, cultivation, plan, appraisable value and owner." The Real Estate Cadastre is full of inaccuracies (borders, owners, geometry of the parcels, etc...). However, in general, there are no conflicts on landownership. "Land tenure and use rights are covered by Spanish law and authorities have implemented tools to record and monitor land tenure and use rights. Since ancient times, these rights have had great social and economic relevance, so they are widely developed and recognized. Examples of land tenure and use rights relevant to the Spanish context include, but are not limited to: mapping and marking of public forests, property registration and cadastre, boundaries (such as property markers) on small private properties, etc. There are many civil associations that play an important role in the restoration and maintenance of the different types of property, such as partnership forests (community forests)." Minor examples of conflicts are witnessed only, for example due to: The documentary for the property can be out of date (old tenure documents, old contracts, or contracts without a notary); Abandoned properties, people can leave without notice; Easements conflict; Conflicts with consortia. Such conflicts are usually well-known to the public authorities and there are established legal ways for resolving the conflicts through negotiation, or via the courts. Laws and regulations in this sphere are respected and work as an efficient tool to prevent the (FSC CW NRA, 2018). This aspect of law enforcement is orderly carried out and no information on corrupted procedures, or law-suits have been found, regarding the legality of ownership and land use within the forest fund of Spain. According to information available from NGOs and governmental sources, this risk can be considered low. Duferco has an additional standard operating procure to avoid conflicts regarding the legality of ownership and land use. Duferco always demands the Authorization for Harvesting, or approved Forest Management plan for private properties. The Forest Service establishes the ownership right through the cadastre before issuing this document or approving the FM plan. Only if this document is provided, Duferco or its suppliers, signs the contract with the owner. This is applicable to all Groups, Forest and TOF: 1A and 3A.

Risk Rating	Low Risk
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Italy Veneto	Indicator
1.1.2	Legal ownership of land and resource use rights shall be respected.
Supply Base Verifiers	Duferco verifies the legal ownership of land and resources through: - data regarding the cadastral reference of the forest lot, that are mandatory in the felling application; - sale contract that is signed by owner/manager to sell to Duferco's supplier and then another contract is signed by Duferco's supplier to sell to Duferco with attached all the signatories' ID documents; - existence of the farm file ("Fascicolo aziendale") that is mandatory for professional farmers/land owners regarding actual land use in each coltural unit for each year. Farm file: Legislative Decree No. 99/2004 https://www.normattiva.it/urires/N2Ls?urn:nir:stato:decreto.legislativo:2004-03-29;99~art1
Risk Rating justification	Legal rights are always respected as the cadastre reference is provided in every step of the process and the cadastral unit is referred to the owner. Duferco asks for sale contracts and verifies them. In order to do that, Duferco requests the land registry ("visura catastale") to the owners or verifies directly through the web service SISTER ("Portale Catastale dell'Agenzia delle Entrate") the correct land heading. According to D.M. 02/03/2010 in case of Short Rotation Forestry or similar or of fieldwork remains it's mandatory that the cadastral units of each owner/land manager are also listed in the farm file ("Fascicolo aziendale") in most cases, with information about actual surface of each unit interested by forest. The farm file is composed by all the documents and information related to Lazio farms and it's available on the online platform called SIAN (Sistema Informativo Agricolo Nazionale). If the farm file ("Fascicolo aziendale") is not present (small land owner that are not professional farmers), records of property can be collected through other legal documents. This is applicable to all Groups, Forest and TOF: 1A, 2A, 3A.
Risk Rating	Low Risk

Italy Lombardy	Indicator
1.1.2	Legal ownership of land and resource use rights shall be respected.
Supply Base Verifiers	Duferco verifies the legal ownership of land and resources through: - data regarding the cadastral reference of the forest lot, that are mandatory in the felling application; - sale contract that is signed by owner/manager to sell to Duferco's supplier and then another contract is signed by Duferco's supplier to sell to Duferco

	with attached all the signatories' ID documents; - existence of the farm file ("Fascicolo aziendale") that is mandatory for professional farmers/land owners regarding actual land use in each coltural unit for each year. Farm file: Legislative Decree No. 99/2004 https://www.normattiva.it/urires/N2Ls?urn:nir:stato:decreto.legislativo:2004-03-29;99~art1
Risk Rating justification	Legal rights are always respected as the cadastre reference is provided in every step of the process and the cadastral unit is referred to the owner. Duferco asks for sale contracts and verifies them. In order to do that, Duferco requests the land registry ("visura catastale") to the owners or verifies directly through the web service SISTER ("Portale Catastale dell'Agenzia delle Entrate") the correct land heading. According to D.M. 02/03/2010 in case of Short Rotation Forestry or similar or of fieldwork remains it's mandatory that the cadastral units of each owner/land manager are also listed in the farm file ("Fascicolo aziendale") in most cases, with information about actual surface of each unit interested by forest. The farm file is composed by all the documents and information related to Lazio farms and it's available on the online platform called SIAN (Sistema Informativo Agricolo Nazionale). If the farm file ("Fascicolo aziendale") is not present (small land owner that are not professional farmers), records of property can be collected through other legal documents. This is applicable to all Groups, Forest and TOF: 1A, 2A, 3A.
Risk Rating	Low Risk

Spain 6 regions in East and South Spain	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	Felling licences, provided by the regional authority. CITES Appendices EUTR application in the Ministry website. contract with the supplier Due Diligence system of Duferco and suppliers UNEP-WCMC, 2018. Background analysis of the 2015-2017 national biennial reports on the implementation of the European Union's Timber Regulation (Regulation EU No 995/2010). UNEPWCMC, Cambridge
Risk Rating justification	The Spanish National Plan for the Control of the Legality of Commercialized Timber (February 2015) is being implemented by the Ministry of Agriculture, Fisheries, and Food. Autonomous Communities, are the competent authorities to which corresponds the normative development and the executive functions inherent to their role, in the accomplishment of controls on the agents and traders who commercialize with timber and timber products, as well as the reception and processing of the statement of

	responsibility included in this Royal Decree, and the control of monitoring bodies with headquarters in the Autonomous Community. The National Control Plan - or Regional Control Plans, where appropriate - is the basis for the different actions. Spain reported that they regularly receive complaints from small businesses that there should be a threshold of operator size below which the EUTR should not apply. Spain suggested that the harmonisation of procedures on checks of operators and risk assessments was required and that technical support should be developed (UNEP- WCMC, 2018). Duferco, also through its suppliers, undertakes 'due diligence' to be sure that illegally harvested wood does not enter the supply chain, ensuring the EUTR compliance. There is always one tire supply chain. Duferco does the harvesting itself or buys wood from suppliers. Duferco, also through its suppliers, hires the trucks for delivery from the harvesting site and supervises the wood chipping and loading of the trucks. Quantity of wood is estimated on the contractual stage and registered exactly in the port. If more wood was harvested from the forest then it was estimated, the difference is declared to the forest authority. Legal details of the suppliers are fixed in the contract between Duferco and the supplier. In case the contract is concluded between Duferco and supplier, the details about owner are also collected. Duferco always demands the felling licence or a notification in case of FM plan. Duferco and its suppliers harvest only species that are neither red-listed in Spain, nor by CITES. Duferco, also through its suppliers, fulfils Declaracion according to the real decree 1088/2015. In case the above-mentioned information and documentation is not available (for instance, not all the suppliers want to share information regarding the owner of the forest property, and they don't provide the felling licence), Duferco does not sign the procurement contract and the timber it not bought. This is applicable to all Groups, Forest and TOF: 1A and 3A. As for TOF (Group 3A) the "national register of companies" (see indicator 1.1.1) is the legal evidence that provides information about title of possession, origin and crop management. Evidence of legal trading is provided by contracts between farmers and suppliers, establishing methods of purchasing and details about sourcing area and feedstock type.
Risk Rating	Low Risk

Italy Tuscany	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	Felling licences, provided by the regional authority. CITES Appendices. EUTR application in Duferco records.

	https://mipaaf.sian.it/portalemipaaf/dettaglioNotizia.jsp?iid=1282&categoria=N https://www.politicheagricole.it/flex/cm/pages/ServeBLOB.php/L/IT/IDPagina/17202 Trading code in the Chamber of Commerce registry for supplier and Duferco (named “codice ATECO”), should be related to timber sourcing/trading. Farm file: Legislative Decree No. 99/2004 https://www.normattiva.it/urires/N2Ls?urn:nir:stato:decreto.legislativo:2004-03-29;99~art1
Risk Rating justification	Harvesting is legal as an “Application of felling” is submitted for every lot and a felling licence is obtained. There are no forest species in Tuscany, collected by Duferco that are enlisted within the CITES appendices. Forest species list collected by Duferco in Tuscany is part of the SBP documents attachments. All Duferco lots are generally associated to an evaluation signed by a forestry engineer or an agronomist who certifies the type of forest/rotation, the quantity of timber considering the surface and other harvesting details. Every year Duferco communicates the quantity and the typology of the woody material placed on market as required by the Italian law that embraces the Timber EU Regulation (EUTR). This information is registered thanks to an online platform so called Registro Imprese Legno (Operatori EUTR). EUTR applies as it is timber; the “Application of felling” provides all data about origin and legality for each lot of forest/plantation. Duferco, also through its suppliers, undertakes a detailed procedure of ‘due diligence’ to be sure that illegally harvested wood does not enter the supply chain, ensuring the EUTR compliance. Duferco does the harvesting itself or buys wood from suppliers. Duferco, also through its suppliers, hires the trucks for delivery from the harvesting site and supervises the wood chipping and loading of the trucks. Quantity of wood is estimated on the contractual stage and registered exactly in the port. If more wood then it was estimated is harvested from the forest, the difference is declared to the forest authority. Legal details of the suppliers are fixed in the contract between Duferco and the supplier. In case the contract is concluded between Duferco and supplier, details about the forest owner are also collected. Duferco always demands the felling licence or a notification and the FM plan. Economic operators involved are legally qualified for forestry works (according to R.L. 39/2000) and trading timber. The majority of information is always available on the web platform ARTEA in the case of Tuscany region; if not, Duferco has to ask directly to the forestry worker the information needed before works begin. This is applicable to all Groups, Forest and TOF: 1A, 2A, 3A. As for TOF (Group 2A and 3A) the “Farm file” (see indicator 1.1.1) is the legal evidence that provide information about title of possession, origin and crop management. Evidence of legal trading is provided by contracts between farmers and suppliers, establishing methods of purchasing and details about

	sourcing area and feedstock kind.
Risk Rating	Low Risk

Italy Apulia	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	Public inventory of “Application of eradication” in Apulia, provided by the regional authority. CITES Appendices EUTR application in the Ministry website. Trading code in the Chamber of Commerce registry for supplier and Duferco (named “codice ATECO”), should be related to agricultural works and/or timber sourcing/trading.
Risk Rating justification	Harvesting is legal as an “Application of eradication” is submitted for every lot of plants. CITES doesn’t apply, as olive trees (scientific name <i>Olea europea</i>) are not listed in any CITES Appendices. EUTR applies as it is timber; the “Application of eradication” provides all data about origin and legality for each lot of plants. Quantity can be provided related to the number of plants, given the volume and timber density, that are collectable data, as olive timber is traditionally used also for carving. Economic operators involved are legally qualified for agricultural works and trading timber
Risk Rating	Low Risk

Italy Lazio	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	Felling licences, provided by the regional authority. CITES Appendices EUTR application in Duferco records. Trading code in the Chamber of Commerce registry for supplier and Duferco (named “codice ATECO”), should be related to timber sourcing/trading Farm file: Legislative Decree No. 99/2004 https://www.normattiva.it/urires/N2Ls?urn:nir:stato:decreto.legislativo:2004-03-29;99~art1
Risk Rating justification	Harvesting is legal as an “Application of felling” is submitted for every lot and a felling licence is obtained. There are no forest species in Lazio, collected by Duferco that are enlisted within the CITES appendices. Forest species list collected by Duferco in

	Lazio is part of the SBP documents attachments. All Duferco lots are generally associated to an evaluation signed by a forester or an agronomist who certifies the type of forest/rotation, the quantity of timber considering the surface and other harvesting details. Every year Duferco communicates the quantity and the typology of the woody material placed on market as required by the Italian law that embraces the Timber EU Regulation (EUTR). This information is registered thanks to an online platform so called Registro Imprese Legno (Operatori EUTR). https://mipaaf.sian.it/portalemipaaf/dettaglioNotizia.jsp?iid=1282&categoria=N https://www.politicheagricole.it/flex/cm/pages/ServeBLOB.php/L/IT/IDPagina/17202 EUTR applies as it is timber; the “Application of felling” provides all data about origin and legality for each lot of forest/plantation. Duferco, also through its suppliers, undertakes a detailed procedure of ‘due diligence’ to be sure that illegally harvested wood does not enter the supply chain, ensuring the EUTR compliance. Duferco does the harvesting itself or buys wood from suppliers. Duferco, also through its suppliers, hires the trucks for delivery from the harvesting site and supervises the wood chipping and loading of the trucks. Quantity of wood is estimated on the contractual stage and registered exactly in the port. If more wood then it was estimated is harvested from the forest, the difference is declared to the forest authority. Legal details of the suppliers are fixed in the contract between Duferco and the supplier. In case the contract is concluded between Duferco and supplier, details about the forest owner are also collected. Duferco always demands the felling licence or a notification and the FM plan. This is applicable to all Groups, Forest and TOF: 1A, 2A, 3A. As for TOF (Group 2A and 3A) the "Farm file" (see indicator 1.1.1) is the legal evidence that provide information about title of possession, origin and crop management. Evidence of legal trading is provided by contracts between farmers and suppliers, establishing methods of purchasing and details about sourcing area and feedstock kind.
Risk Rating	Low Risk

Italy Emilia-Romagna	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	Felling licences, provided by the regional authority. CITES Appendices EUTR application in Duferco records.

	Trading code in the Chamber of Commerce registry for supplier and Duferco (named “codice ATECO”), should be related to timber sourcing/trading. Forestry companies board: https://ambiente.regione.emilia-romagna.it/it/parchi-natura2000/foreste/gestione-forestale/albo-imprese-forestali
Risk Rating justification	Harvesting is legal as an “Application of felling” is submitted for every lot and a felling licence is obtained. There are no forest species in Emilia-Romagna, collected by Duferco that are enlisted within the CITES appendices. Forest species list collected by Duferco is part of the SBP documents attachments. All Duferco lots are generally associated to an evaluation signed by a forester or an agronomist who certifies the type of forest/rotation, the quantity of timber considering the surface and other harvesting details. Every year Duferco communicates the quantity and the typology of the woody material placed on market as required by the Italian law that embraces the Timber EU Regulation (EUTR). This information is registered thanks to an online platform so called Registro Imprese Legno (Operatori EUTR). https://mipaaf.sian.it/portale-mipaaf/dettaglioNotizia.jsp?iid=1282&categoria=N https://www.politicheagricole.it/flex/cm/pages/ServeBLOB.php/L/IT/IDPagina/17202 EUTR applies as it is timber; the “Application of felling” provides all data about origin and legality for each lot of forest/plantation. Duferco, also through its suppliers, undertakes a detailed procedure of ‘due diligence’ to be sure that illegally harvested wood does not enter the supply chain, ensuring the EUTR compliance. Duferco does the harvesting itself or buys wood from suppliers. Duferco, also through its suppliers, hires the trucks for delivery from the harvesting site and supervises the wood chipping and loading of the trucks. Quantity of wood is estimated on the contractual stage and registered exactly in the port. If more wood than it was estimated is harvested from the forest, the difference is declared to the forest authority. Legal details of the suppliers are fixed in the contract between Duferco and the supplier. In case the contract is concluded between Duferco and supplier, details about the forest owner are also collected. Duferco always demands the felling licence or a notification and the FM plan. Economic operators involved are legally qualified for forestry works and trading timber (according to Regional Forestry Regulation no. 3/2018). The majority of information is always available on the web platform AGREA in the case of Emilia-Romagna region; if not, Duferco has to ask directly to the forestry worker the information needed before works begin.
Risk Rating	Low Risk

Italy Lombardy	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	Felling licences, provided by the regional authority. CITES Appendices EUTR application in Duferco records. Trading code in the Chamber of Commerce registry for supplier and Duferco (named "codice ATECO"), should be related to timber sourcing/trading Farm file: Legislative Decree No. 99/2004 https://www.normattiva.it/urires/N2Ls?urn:nir:stato:decreto.legislativo:2004-03-29;99~art1
Risk Rating justification	Harvesting is legal as an "Application of felling" is submitted for every lot and a felling licence is obtained. There are no forest species in Lazio, collected by Duferco that are enlisted within the CITES appendices. Forest species list collected by Duferco in Lazio is part of the SBP documents attachments. All Duferco lots are generally associated to an evaluation signed by a forester or an agronomist who certifies the type of forest/rotation, the quantity of timber considering the surface and other harvesting details. Every year Duferco communicates the quantity and the typology of the woody material placed on market as required by the Italian law that embraces the Timber EU Regulation (EUTR). This information is registered thanks to an online platform so called Registro Imprese Legno (Operatori EUTR). https://mipaaf.sian.it/portalemipaaf/dettaglioNotizia.jsp?iid=1282&categoria=N https://www.politicheagricole.it/flex/cm/pages/ServeBLOB.php/L/IT/IDP/17202 EUTR applies as it is timber; the "Application of felling" provides all data about origin and legality for each lot of forest/plantation. Duferco, also through its suppliers, undertakes a detailed procedure of 'due diligence' to be sure that illegally harvested wood does not enter the supply chain, ensuring the EUTR compliance. Duferco does the harvesting itself or buys wood from suppliers. Duferco, also through its suppliers, hires the trucks for delivery from the harvesting site and supervises the wood chipping and loading of the trucks. Quantity of wood is estimated on the contractual stage and registered exactly in the port. If more wood then it was estimated is harvested from the forest, the difference is declared to the forest authority. Legal details of the suppliers are fixed in the contract between Duferco and the supplier. In case the contract is concluded between Duferco and supplier, details about the forest owner are also collected. Duferco always demands the felling licence or a notification and the FM plan. This is applicable to all Groups, Forest and TOF: 1A, 2A, 3A. As for TOF (Group 2A and 3A) the "Farm file" (see indicator 1.1.1) is the legal evidence that provide information about title of possession, origin and

	crop management. Evidence of legal trading is provided by contracts between farmers and suppliers, establishing methods of purchasing and details about sourcing area and feedstock kind.
Risk Rating	Low Risk

Italy Veneto	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	Felling licences, provided by the regional authority. CITES Appendices. EUTR application in Duferco records. https://mipaaf.sian.it/portalemipaaf/dettaglioNotizia.jsp?iid=1282&categoria=N https://www.politicheagricole.it/flex/cm/pages/ServeBLOB.php/L/IT/IDPagina/17202 Trading code in the Chamber of Commerce registry for supplier and Duferco (named “codice ATECO”), should be related to timber sourcing/trading. Farm file: Legislative Decree No. 99/2004 https://www.normattiva.it/urires/N2Ls?urn:nir:stato:decreto.legislativo:2004-03-29;99~art
Risk Rating justification	Harvesting is legal as an “Application of felling” is submitted for every lot and a felling licence is obtained. There are no forest species in Italy, collected by Duferco that are enlisted within the CITES appendices. Forest species list collected by Duferco in Tuscany is part of the SBP documents attachments. All Duferco lots are generally associated to an evaluation signed by a forester or an agronomist who certifies the type of forest/rotation, the quantity of timber considering the surface and other harvesting details. Every year Duferco communicates the quantity and the typology of the woody material placed on market as required by the Italian law that embraces the Timber EU Regulation (EUTR). This information is registered thanks to an online platform so called Registro Imprese Legno (Operatori EUTR). The “Application of felling” provides all data about origin and legality for each lot of forest/plantation. Duferco, also through its suppliers, undertakes a detailed procedure of ‘due diligence’ to be sure that illegally harvested wood does not enter the supply chain, ensuring the EUTR compliance. Duferco does the harvesting itself or buys wood from suppliers. Duferco, also through its suppliers, hires the trucks for delivery from the harvesting site and supervises the wood chipping and loading of the trucks. Quantity of wood is estimated on the contractual stage and registered exactly in the port. If more wood then it was estimated is harvested from the forest, the difference is declared to the forest authority. Legal details of the suppliers are fixed in the contract between Duferco and the supplier.

	In case the contract is concluded between Duferco and supplier, details about the forest owner are also collected. Duferco always demands the felling licence or a notification and the FM plan. Forestry companies are registered in the regional register (https://www.regione.veneto.it/web/agricoltura-e-foreste/albo-imprese). Registration in the Register is mandatory in the following cases: 1. carrying out silvicultural operations equal to or greater than 100 cubic meters gross of timber in the forest and upon an area of 2.5 hectares or more in coppice; 2. carrying out silvicultural interventions upon a smaller area than the previous point, if requested by the forest owner; 3. carrying out silvicultural interventions of material crashed as a result of calamitous events, regardless of their volumetric or planimetric size; 4. obtaining publicly owned silvo-pastoral areas under management, pursuant to paragraph 3 of Article 23bis of Regional Law No. 52/1978. This is applicable to all Groups, Forest and TOF: 1A, 2A, 3A. As for TOF (Group 2A and 3A) the "Farm file" (see indicator 1.1.1) is the legal evidence that provide information about title of possession, origin and crop management. Evidence of legal trading is provided by contracts between farmers and suppliers, establishing methods of purchasing and details about sourcing area and feedstock kind.
Risk Rating	Low Risk

Italy Emilia-Romagna	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	Contracts between suppliers and Duferco.
Risk Rating justification	No royalties nor taxes are due for harvesting timber of any kind in Emilia-Romagna Region. Only VAT is due for each invoice issued in the process, with some exemptions regulated by laws, that must be mentioned within the invoice details. VAT, when due, is paid by each enterprise monthly or every quarter of year, following a compensation calculation (VAT debit minus VAT credit).
Risk Rating	Low Risk

Italy Lazio	Indicator
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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	Contracts between suppliers and Duferco. Invoices from suppliers according to the legal mandatory platforms to issue electronic invoices.
Risk Rating justification	No royalties nor taxes are due for harvesting timber of any kind in Lazio Region. Only VAT is due for each invoice issued in the process, with some exemptions regulated by laws, that must be mentioned within the invoice details. VAT, when due, is paid by each enterprise monthly or every quarter of year, following a compensation calculation (VAT debit minus VAT credit). Agricultural residues - TOF Agricultural land (3A) or trees from gardens - TOF Urban and landscape (2A), landscape are only subject to trade between parts and payment of VAT, if due (depending on the case).
Risk Rating	Low Risk

Italy Apulia	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	Contracts between farmers and Duferco's supplier; contract between supplier and Duferco.
Risk Rating justification	No royalties nor taxes are due for harvesting timber of any kind in Apulia Region. Only VAT is due for each invoice issued in the process, with some exemptions regulated by laws, that must be mentioned within the invoice details. VAT, when due, is paid by each enterprise monthly or every quarter of year, following a compensation calculation (VAT debit minus VAT credit). The tax agency ("Agenzia delle Entrate") checks these payments.
Risk Rating	Low Risk

Italy Tuscany	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	Contracts between suppliers and Duferco. Invoices from suppliers according to the legal mandatory platforms to issue electronic invoices.
Risk Rating justification	No royalties nor taxes are due for harvesting timber of any kind in Tuscany

	Region. Only VAT is due for each invoice issued in the process, with some exemptions regulated by laws, that must be mentioned within the invoice details. VAT, when due, is paid by each enterprise monthly or every quarter of year, following a compensation calculation (VAT debit minus VAT credit). Agricultural residues - TOF Agricultural land (3A) or trees from gardens - TOF Urban and landscape (2A), landscape are only subject to trade between parts and payment of VAT, if due (depending on the case).
Risk Rating	Low Risk

Spain 6 regions in East and South Spain	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	Contracts between suppliers and Duferco.
Risk Rating justification	No royalties nor taxes are due for harvesting timber of any kind in Spain. Only VAT is due for each invoice issued in the process. Payment of this tax is crosschecked by the tax authority on the basis of the declaration of both parties (the seller and the buyer). If it's not paid, the tax authority conducts a tax audit and issued fines if there are violations of the tax payment obligations. In case of harvesting in the public areas the VAT tax is also included in the invoice. Price of auction is paid to public administrations in case of auction, prior to felling licence (that is not issued if the price is not paid). Agricultural residues - TOF Agricultural land (3A) are only subject to trade between parts and payment of VAT, if due.
Risk Rating	Low Risk

Italy Veneto	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	Contracts between suppliers and Duferco. Invoices from suppliers according to the legal mandatory platforms to issue electronic invoices.
Risk Rating justification	No royalties nor taxes are due for harvesting timber of any kind in Veneto Region. Only VAT is due for each invoice issued in the process, with some exemptions regulated by laws, that must be mentioned within the invoice details. VAT, when due, is paid by each enterprise monthly or every quarter of year,

	following a compensation calculation (VAT debit minus VAT credit). Agricultural residues - TOF Agricultural land (3A) or trees from gardens - TOF Urban and landscape (2A), landscape are only subject to trade between parts and payment of VAT, if due (depending on the case).
Risk Rating	Low Risk

Italy Lombardy	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	Contracts between suppliers and Duferco. Invoices from suppliers according to the legal mandatory platforms to issue electronic invoices.
Risk Rating justification	No royalties nor taxes are due for harvesting timber of any kind in Lombardy Region. Only VAT is due for each invoice issued in the process, with some exemptions regulated by laws, that must be mentioned within the invoice details. VAT, when due, is paid by each enterprise monthly or every quarter of year, following a compensation calculation (VAT debit minus VAT credit). Agricultural residues - TOF Agricultural land (3A) or trees from gardens - TOF Urban and landscape (2A), landscape are only subject to trade between parts and payment of VAT, if due (depending on the case).
Risk Rating	Low Risk

Spain 6 regions in East and South Spain	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	Contracts between suppliers and Duferco. Felling licenses issue according to National and regional forestry laws and regulations.
Risk Rating justification	Contracts assure the legality of sourcing timber and they are linked to each "Felling Application". Contracts between Duferco and suppliers must have the following information: - contracts between owners - cadastral information and map of the working area - wood species - type of wood - estimated quantity - duration of the contract - other authorizations that are eventually required

	No mining or encroachment are applicable, as only the owner or legal user can apply for felling, for an identified surface within the identified cadastral unit. This applies to woody residues sourced by TOF Group 3A. As for TOF (Group 3A), the "national register of companies" (see indicator 1.1.1) is the legal evidence that provides information about title of possession, origin and crop management. Evidence of legal trading is provided by contracts between farmers and suppliers, establishing methods of purchasing and details about sourcing area and feedstock type.
Risk Rating	Low Risk

Italy Tuscany	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	Contracts between suppliers and Duferco. Suppliers registration at the Registry of Commerce (Camera di Commercio). Contracts between forest owner/managers and suppliers. Farm file, Legislative Decree No. 99/2004 https://www.normattiva.it/urires/N2Ls?urn:nir:stato:decreto.legislativo:2004-03-29;99~art1
Risk Rating justification	Contracts assure the legality of sourcing timber and they are linked to each "Felling Application". Contracts between Duferco and suppliers must have the following information: - contracts between owners - cadastral information and map of the working area - wood species - type of wood - estimated quantity - duration of the contract - other authorizations that are eventually required. No mining or encroachment are applicable, as only the owner or legal user can apply for felling, for an identified surface within the identified cadastral unit. This does not apply to TOF Group 2A, but it applies to woody residues sourced from TOF Group 3A. As for TOF (Group 2A and 3A) the "Farm file" (see indicator 1.1.1) is the legal evidence that provide informations about title of possession, origin and crop management. Evidence of legal trading is provided by contracts between farmers and suppliers, establishing methods of purchasing and details about sourcing area and feedstock kind.
Risk Rating	Low Risk

Italy Apulia	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	Contracts between owner and Duferco's supplier; contract between supplier and Duferco.
Risk Rating justification	Contracts assure the legality of sourcing timber and they are linked to each "Eradication Application". No mining or encroachment are applicable, as only the owner or legal user can apply for eradication of olive trees, for a certain number of plants within the identified cadastral unit. No olive tree is cut if not authorized by proper document in extraordinary circumstances such as Xylella pest.
Risk Rating	Low Risk

Italy Lazio	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	Contracts between suppliers and Duferco. Farm file, Legislative Decree No. 99/2004 https://www.normattiva.it/urires/N2Ls?urn:nir:stato:decreto.legislativo:2004-03-29;99~art1
Risk Rating justification	Contracts assure the legality of sourcing timber and they are linked to each "Felling Application". Contracts between Duferco and suppliers must have the following information: - contracts between owners - cadastral information and map of the working area - wood species - type of wood - estimated quantity - duration of the contract - other authorizations that are eventually required No mining or encroachment are applicable, as only the owner or legal user can apply for felling, for an identified surface within the identified cadastral unit. This does not apply to TOF Group 2A, but it applies to woody residues sourced by TOF Group 3A. As for TOF (Group 2A and 3A) the "Farm file" (see indicator 1.1.1) is the legal evidence that provide informations about title of possession, origin and crop management. Evidence of legal trading is provided by contracts between farmers and suppliers, establishing methods of purchasing and details about sourcing area and feedstock kind.

Risk Rating	Low Risk
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Italy Emilia-Romagna	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	Contracts between suppliers and Duferco.
Risk Rating justification	Contracts assure the legality of sourcing timber and they are linked to each “Felling Application”. Contracts between Duferco and suppliers must have the following information: - contracts between owners - cadastral information and map of the working area - wood species - type of wood - estimated quantity - duration of the contract - other authorizations that are eventually required No mining or encroachment are applicable, as only the owner or legal user can apply for felling, for an identified surface within the identified cadastral unit.
Risk Rating	Low Risk

Italy Lombardy	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	Contracts between suppliers and Duferco. Suppliers registration at the Registry of Commerce (Camera di Commercio). Contracts between forest owner/managers and suppliers. Farm file, Legislative Decree No. 99/2004 https://www.normattiva.it/urires/N2Ls?urn:nir:stato:decreto.legislativo:2004-03-29;99~art1
Risk Rating justification	Contracts assure the legality of sourcing timber and they are linked to each “Felling Application”. Contracts between Duferco and suppliers must have the following information: - contracts between owners - cadastral information and map of the working area - wood species - type of wood - estimated quantity - duration of the contract - other authorizations that are eventually required.

	No mining or encroachment are applicable, as only the owner or legal user can apply for felling, for an identified surface within the identified cadastral unit. This does not apply to TOF Group 2A, but it applies to woody residues sourced from TOF Group 3A. As for TOF (Group 2A and 3A) the "Farm file" (see indicator 1.1.1) is the legal evidence that provide informations about title of possession, origin and crop management. Evidence of legal trading is provided by contracts between farmers and suppliers, establishing methods of purchasing and details about sourcing area and feedstock kind.
Risk Rating	Low Risk

Italy Veneto	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	Contracts between suppliers and Duferco. Suppliers registration at the Registry of Commerce (Camera di Commercio). Contracts between forest owner/managers and suppliers. Farm file, Legislative Decree No. 99/2004 https://www.normattiva.it/urires/N2Ls?urn:nir:stato:decreto.legislativo:2004-03-29;99~art1
Risk Rating justification	Contracts assure the legality of sourcing timber and they are linked to each "Felling Application". Contracts between Duferco and suppliers must have the following information: - contracts between owners - cadastral information and map of the working area - wood species - type of wood - estimated quantity - duration of the contract - other authorizations that are eventually required. No mining or encroachment are applicable, as only the owner or legal user can apply for felling, for an identified surface within the identified cadastral unit. This does not apply to TOF Group 2A, but it applies to woody residues sourced from TOF Group 3A. As for TOF (Group 2A and 3A) the "Farm file" (see indicator 1.1.1) is the legal evidence that provide informations about title of possession, origin and crop management. Evidence of legal trading is provided by contracts between farmers and suppliers, establishing methods of purchasing and details about sourcing area and feedstock kind.
Risk Rating	Low Risk

Italy Veneto	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	UE Natura 2000 Network (Habitat Directive 92/43/CEE): https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:1992L0043:20070101:IT:PDF National Law no. 394/1991 (framework law on protected areas) https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:legge:1991-12-06;394 Presidential Decree D.P.R. 130/2003: https://www.mase.gov.it/sites/default/files/archivio/allegati/rete_natura_2000/D.P.R._120_del_12_marzo_2003.PDF Regional Law n. 23/2018: https://bur.regione.veneto.it/BurvServices/pubblica/DettaglioLegge.aspx?id=373060 Nature 2000 sites viewer: https://natura2000.eea.europa.eu/ Database of protected areas https://www.regione.veneto.it/web/agricoltura-e-foreste/parchi-e-aree-protette Geoportal https://idt2.regione.veneto.it/idt/webgis/viewer?webgisId=219 GRAS System database derived from European Environment Agency maps, as for special conservation sites (Nature 2000 sites covering also agricultural land) https://gtplus.gras-system.org/
Risk Rating justification	According to National Law no. 394/1991 and regional Law no. 23/2018, areas of high conservation value are identified as for boundaries and also protected species and habitats (see map of protected areas and Nature 2000 sites below)

Veneto

Tutti i parchi

Belluno
Padova
Rovigo
Treviso
Venezia
Verona
Vicenza

Mappa

Localizza le diverse aree protette e clicca sulla singola icona per la **mappa** (in via di)

☒ Parchi Nazionali (1)	☒ Parchi Regionali (5)	☒ Riserve Statali (14)
☒ Riserve Statali (14)	☒ Riserve Regionali (6)	☒ Riserve Biosfera MAB (4)
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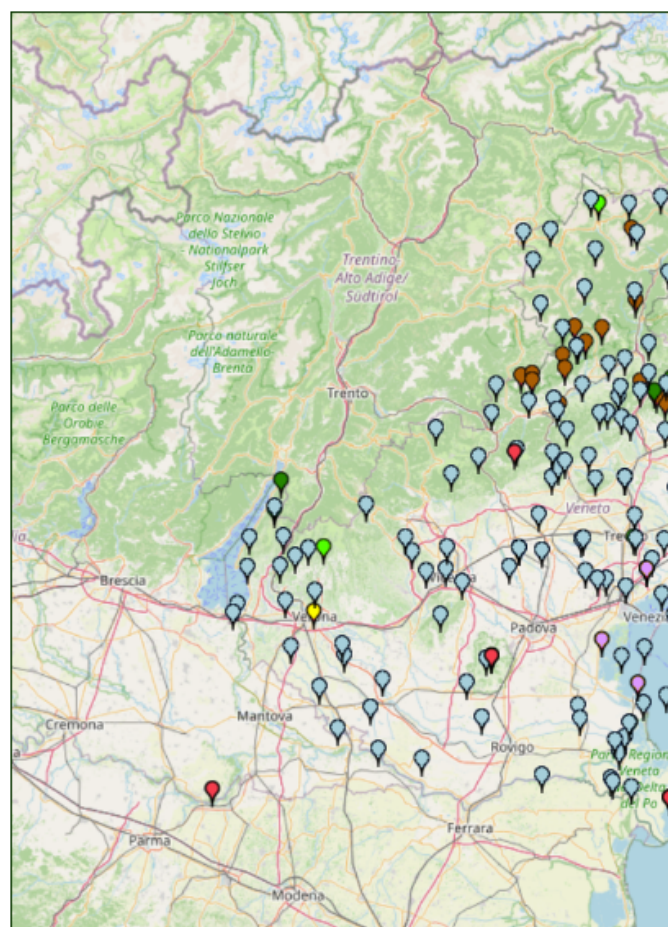
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In Veneto approximately 22% of the terrestrial area is protected, categorized as follows:

- 1 National Park (that is also part of the UNESCO site);
- 5 Regional Parks;
- 20 natural reserves;
- 131 Nature 2000 sites.

This means that thanks to National Laws and regional Laws, areas of high

conservation value are clearly identified and mapped as for surfaces, boundaries and species.

The regional geoportal that identifies protected areas and Forests with high naturalistic value.



Rural police are represented by Gruppo Carabinieri Forestale, who monitor operations in the forests but also in agricultural land or urban land related to TOF sourcing, as they oversee any matter related to trees and environment.

Risk Rating

Low Risk

Italy Lombardy	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	National Law n. 394/1991 https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:legge:1991-12-06;394 Regional Law no. 86/1983 https://normelombardia.consiglio.regione.lombardia.it/normelombardia/Accessibile/main.aspx?view=showdoc&iddoc=lr001983113000086 Regional protected areas: https://www.regione.lombardia.it/wps/portal/istituzionale/HP/DettaglioRedazionale/servizi-e-informazioni/enti-e-operatori/ambiente-ed-energia/parchi-e-aree-protette/sistema-aree-protette-lombarde/sistema-aree-protette-lombarde Database of protected areas: https://www.regione.lombardia.it/wps/portal/istituzionale/HP/servizi-e-informazioni/enti-e-operatori/ambiente-ed-energia/parchi-e-aree-protette

Risk Rating justification	Lombardy is covered by protected areas (national parks, regional parks, nature reserves, natural monuments, and local parks) for one quarter of the entire regional area, that is 27%. About 16% are Natura 2000 sites. Protection of these areas is provided by Regional Law No. 86/983, that builds foundation for the Lombardy Protected Areas System, that includes 24 regional parks, 101 local parks, 3 state nature reserves, 67 regional nature reserves, 33 natural monuments, and 246 Natura 2000 sites. In these areas there are several species listed on conservation lists (IUCN, national red lists, etc.) and some endemic species. The regional parks ensure protection of biodiversity, environment, landscape features as a mosaic of agricultural plots, and forests, as well as pastures up in the mountains. The morphological variety of land within Lombardy includes parks of the following categories: river parks, mountain parks, agricultural parks, forest parks, and metropolitan parks. State and Regional nature reserves provide protection of endangered habitats and species, while local parks (PLIS) are the basic connection and integration between regional protected areas.
Risk Rating	Low Risk

Italy Emilia-Romagna	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	National Law n. 394/1991 Regional law no. 19/2021 regarding Provisions related to the Regional Stability Law for 2022 (see arts. 7-8 which specify the competencies of management bodies for sites shared with national Protected Areas and the procedures for Incidence Assessments of plans and projects affecting multiple Natura 2000 sites) https://demetra.regione.emilia-romagna.it/al/articolo?urn=er:assemblealegislativa:legge:2021;19 Regional law no. 4/2021 regarding European Law for 2021 (see arts. 25-28 which define the site management bodies and competencies regarding Incidence Assessments) https://demetra.regione.emilia-romagna.it/al/articolo?urn=er:assemblealegislativa:legge:2021;4 Regional law no. 11/2020 regarding Provisions related to the Regional Stability Law for 2021 (see art. 9 on the management function of marine Natura 2000 Network sites attributed to the Management Body for Parks and Biodiversity – Po Delta) https://demetra.regione.emilia-romagna.it/al/articolo?urn=er:assemblealegislativa:legge:2020;11 Regional law no. 13/2019 regarding Provisions related to the Supplementary

Budget Law and first general amendment to the forecast budget of the Emilia-Romagna Region 2019-2021 (see arts. 10-14 on Protection of Regional Parks, Art. 14 repealed)
<https://demetra.regione.emilia-romagna.it/al/articolo?urn=er:assemblealegislativa:legge:2019;13>

Regional law no. 24/2018 regarding Provisions related to the Regional Stability Law for 2019 (see arts. 16-17-18-19 on Ecological Rebalancing Areas and Natura 2000 sites) <https://demetra.regione.emilia-romagna.it/al/articolo?urn=er:assemblealegislativa:legge:2018;24>

Regional law no. 11/2018 regarding Provisions related to the Supplementary Budget Law and first general amendments to the forecast budget of the Emilia-Romagna Region 2018-2020 (see Art. 4 - Replacement of Art. 3 of Regional Law no. 7/2004 concerning Conservation Measures for Natura 2000 Network sites)
<https://demetra.regione.emilia-romagna.it/al/articolo?urn=er:assemblealegislativa:legge:2018;11>

Regional law no. 16/2017 regarding Provisions for the adaptation of regional regulations on environmental matters and in favor of areas affected by seismic events (arts. 25-28) <https://demetra.regione.emilia-romagna.it/al/articolo?urn=er:assemblealegislativa:legge:2017;16>

Regional law no. 25/2016 regarding Provisions related to the Regional Stability Law for 2017 (see Art. 11 - Amendments to article 18 of regional law no. 13 of 2015 concerning the attribution of functions to the Region)
<https://demetra.regione.emilia-romagna.it/al/articolo?urn=er:assemblealegislativa:legge:2016;25>

Regional law no. 9/2016 regarding Regional Community Law for 2016 (see Art. 22 - Amendments to article 20 of regional law no. 22 of 2015 concerning competencies on environmental incidence assessments, Art. 22 repealed)
<https://demetra.regione.emilia-romagna.it/al/articolo?urn=er:assemblealegislativa:legge:2016;9>

Regional law no. 22/2015 regarding Provisions related to the Regional Stability Law for 2016 (see Art. 20 - Transitional provisions for the management of Natura 2000 Network sites and environmental incidence assessments, art. 20 repealed) <https://demetra.regione.emilia-romagna.it/al/articolo?urn=er:assemblealegislativa:legge:2015;22>

Regional law no. 13/2015 regarding Reform of the regional and local government system and provisions on the Metropolitan City of Bologna, Provinces, Municipalities and their Unions (see Art. 18 - Management bodies for parks and biodiversity)
<https://demetra.regione.emilia-romagna.it/al/articolo?urn=er:assemblealegislativa:legge:2015;13>

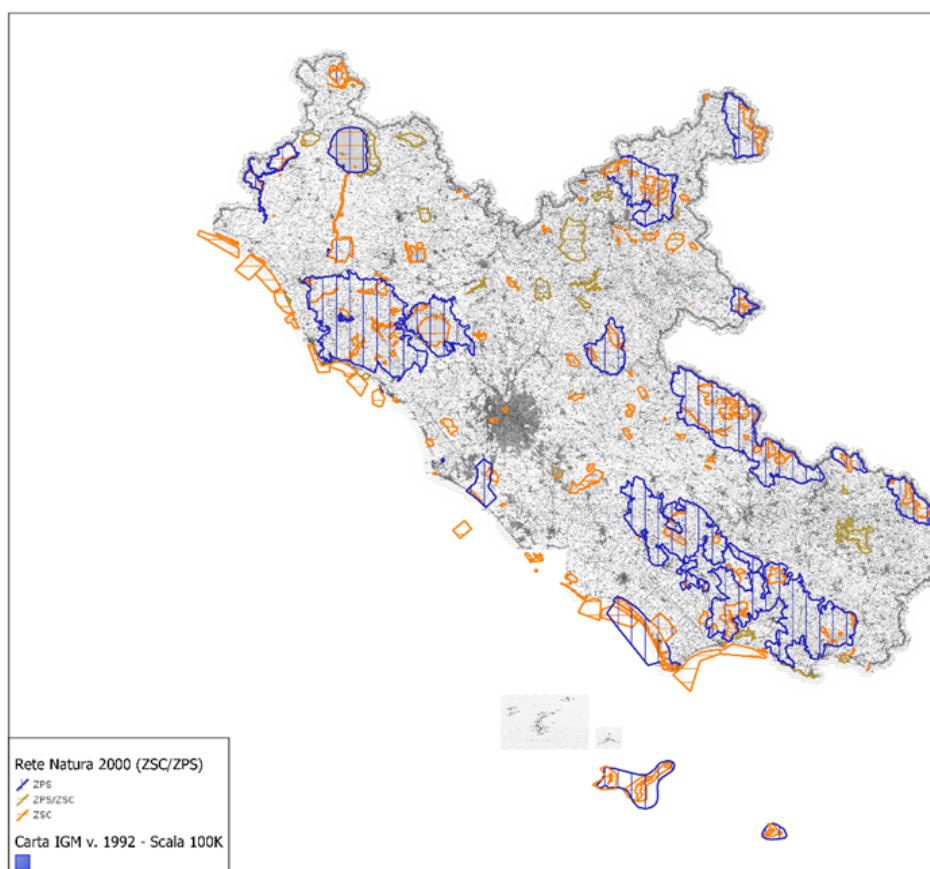
Regional law no. 7/2014 regarding Regional Community Law for 2014 (see Art. 79 - Application of stricter rules in case of different provisions pending regional approval) <https://demetra.regione.emilia-romagna.it/al/articolo?urn=er:assemblealegislativa:legge:2014;7>

Regional law no. 24/2011 regarding Reorganization of the regional system of Protected Areas and Natura 2000 Network sites and establishment of the Regional Park of Stirone and Piacenziano <https://demetra.regione.emilia-romagna.it/al/articolo?urn=er:assemblealegislativa:legge:2011;24>

	romagna.it/al/articolo?urn=er:assemblealegislativa:legge:2011;24 Regional law no. 4/2007 regarding Regulatory adaptations in environmental matters. Amendments to Regional Laws (see articles 34 and 35) https://demetra.regione.emilia-romagna.it/al/articolo?urn=er:assemblealegislativa:legge:2007;4 Regional law no. 6/2005 regarding Discipline of the formation and management of the regional system of Protected Natural Areas and Natura 2000 Network sites (consolidated text with amendments introduced by regional laws: 10/2005, 4/2007, 24/2011, 9/2016, 16/2017, 11/2018, 24/2018) https://demetra.regione.emilia-romagna.it/al/articolo?urn=er:assemblealegislativa:legge:2005;6 Regional law no. 7/2004 regarding Provisions on environmental matters. Amendments and additions to Regional Laws (Arts. 5-8 repealed) https://demetra.regione.emilia-romagna.it/al/articolo?urn=er:assemblealegislativa:legge:2004;7 -Further protection measures occurred for monumental trees through national and regional law no. 20/2023 regarding Regulations for the conservation of monumental trees and ancient forests https://demetra.regione.emilia-romagna.it/al/articolo?urn=er:assemblealegislativa:legge:2023;20
Risk Rating justification	According to National Laws and regional Laws areas of high conservation value are identified as for boundaries and also protected species and habitats (see map of protected areas and Nature 2000 sites below). Legend: - PN - parco nazionale - PI - parco interregionale - PR - parco regionale - RR - riserva regionale - PP - paesaggio protetto - ARE - area di riequilibrio ecologico - Sito ZSC e/o ZPS - Macroarea - Confine provinciale

	Source: https://ambiente.regione.emilia-romagna.it/it/parchi-natura2000/aree-protette/immagini-aapp/mappe-regione-2020/completa_ok.png Protected areas cover approximately 16.2% of the Emilia-Romagna region surface. The gross total of all designated protected areas, including overlapping designations (Parks, Reserves, Natura 2000 sites), cover about 400,766 ha. This helps biodiversity conservation as well as ecosystem services. The regional protected areas system includes National and Regional Parks, Natural Reserves, Natural and Semi-natural Protected Landscapes, Ecological Rebalancing Areas and Natura 2000 sites.
Risk Rating	Low Risk

Italy Lazio	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	National Law no. 394/1991 about nature protection areas: https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:legge:1991-12-06;394 Regional law n.46/1977 “Costituzione di un sistema di parchi regionali e delle riserve naturali” : Consiglio Regionale del Lazio - leggi regionali (testo coordinato) - legge num. 46 del 28 novembre 1977 Regional law n.29/1997 regarding conservation and valorisation of naturalistic heritage “Norme in materia di aree naturali protette regionali” : Consiglio Regionale del Lazio - leggi regionali (testo coordinato) - legge num. 29 del 6 ottobre 1997
Risk Rating justification	According to National Laws and regional Laws areas of high conservation value are identified as for boundaries and also protected species and habitats (see map of Nature 2000 sites below).



Source: Rete Natura 2000 (ZSC/ZPS) — geoportale.regione.lazio.it

In Lazio region there are 200 Nature 2000 sites covering the 23.1% of the whole regional surface, of which 398.008 ha are located in terrestrial environments. The Nature 2000 sites and the other protected areas, called AA.NN.PP., are interconnected so that the 27% of the Nature 2000 sites are part of the AA.NN.PP. while the 46% of the AA.NN.PP. surface overlaps with Nature 2000 sites.

Regional laws have the aims to protect the rich historical and cultural heritage to promote the agricultural and forestry activities sustainable development while maintaining local traditions. In case of forestry activities affecting protected areas, it's mandatory to transmit all the documentation required to the Ente Parco (park authority) interested by the activity so that mandatory rules can be issued in writing by the authority.

Rural police are represented by Gruppo Carabinieri Forestale, who monitor operations in the forests but also in agricultural land or urban land related to TOF sourcing, as they oversee any matter related to trees and environment.

Risk Rating

Low Risk

Italy Apulia	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	-Protection measures for all Olive trees in Apulia, that also indirectly protect the biodiversity related to olive trees orchards, as established by national Law n.144/1951. -Further protection measures for monumental olive trees (through regional law n. 14/2007). -GRAS System database derived from European Environment Agency maps, as for special conservation sites (Nature 2000 sites covering also agricultural land). -Agricultural Land of Olive trees plain of Apulia ("Paesaggio Agrario della Piana degli Oliveti Monumentali di Puglia"): https://www.reterurale.it/flex/cm/pages/ServeBLOB.php/L/IT/IDPagina/17435
Risk Rating justification	Nature 2000 sites are clearly identified, so are the key species and habitats, both on European and national databases. Further measures identify, for protection purposes, areas with olive trees and dry stone walls in Apulia, indirectly identifying also the habitats of key species; detailed maps of areas of olive trees orchards and also lines of dry stone walls are provided in the public link https://www.reterurale.it/flex/cm/pages/ServeBLOB.php/L/IT/IDPagina/17435.
Risk Rating	Low Risk

Italy Tuscany	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	National Law n. 394/1991 According to National Laws and regional Laws areas of high conservation value are identified as for boundaries and also protected species and habitats (see map of protected areas and Nature 2000 sites, Source: Regione Toscana - SIPT: Aree Protette e siti Natura 2000 Protected areas cover approximately the 10% of the Tuscany region surface for about 230.000 ha. In case of forestry activities affecting protected areas, it's mandatory to transmit all the documentation required to Tuscany Region or to the Ente Parco (park authority) interested by the activity so that mandatory rules can be issued in writing by the authority. Regional law n. 30/2015 regarding conservation and valorisation of naturalistic heritage ("Norme per la conservazione e la valorizzazione del patrimonio naturalistico - ambientale regionale"): https://raccoltanormativa.consiglio.regione.toscana.it/articolo?urndoc=urn:n

	ir:regione.toscana:legge:2015-03-19;30 Resolution of the regional council n. 13/2022: http://www301.regione.toscana.it/bancadati/atti/DettaglioAttiG.xml?codprat=2021DG00000001853 The administrative procedures relating to plans, projects and interventions in protected areas are carried out directly by the Tuscany Region. Below is the link where the operating procedures are indicated: https://www.regione.toscana.it/-/nulla-osta-e-valutazioni-di-incidenza-ambientale -Further protection measures occurred for monumental trees through national and regional law (L.R. 30/2015 “Norme per la conservazione e la valorizzazione del patrimonio naturalistico - ambientale regionale”) Alberi monumentali - Regione Toscana legge-2015-00030-2.pdf (regione.toscana.it) -GRAS System database derived from European Environment Agency maps, as for special conservation sites (Nature 2000 sites covering also agricultural land.
Risk Rating justification	Nature 2000 sites are clearly identified, so are the key species and habitats, both on European and national databases; further measures identify, for protection purposes, regional areas. There is a strict verification of rules by local authority in charge of protection measures about HCV. Rural police are represented by Gruppo Carabinieri Forestale, who monitor operations in the forests but also in agricultural land or urban land related to TOF sourcing, as they oversee any matter related to trees and environment.
Risk Rating	Low Risk

Spain 6 regions in East and South Spain	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	Law enforcement in Spain at national and regional level. Online maps/geoportals. Manuals of good practices in sustainable forest management Felling licences Contracts with supplier
Risk Rating justification	Nature 2000 sites are clearly identified, so are the key species and habitats, both on European and national databases; further measures identify, for protection purposes, regional areas. Precise verification of regulatory provisions by local authority in charge of protection measures about HCV. The most valid and updated reference for this assessment is the Common Guidelines for the Identification of High Conservation Values, published in 2013 by the HCV Resource Network, which was subsequently published in

	Spanish in 2014. The Birds and Habitats Directives and other relevant documents on nature protection and management in Spain have been adopted as global references for biological HCV. The website of the Ministry of Agriculture Fisheries, Food contains information on HCV their management and conservation, as well as on national forest issues. Water management is the responsibility of the Ministry also. The data are sufficient to determine the presence of HCV in the Supply Base. Spain is contributing the most to the Natura 2000 network among all European countries. The implementation of it in Spain means extending the protected area status to approximately 28% of the territory, a significant proportion. In Spain there are 1,863 Natura 2000 sites, of which 1,467 are Sites of Community Importance (LIC, Lugares de Importancia Comunitaria) and 644 are Special Protection Areas for Birds (ZEPA, Zonas Especiales de Protección para las Aves), covering 27.3% of Spanish territory; some LIC and ZEPA overlap. The Natura 2000 Viewer shows on a map the location of Natura 2000 sites along with other information across different layers. The Habitats Directive and the Natura 2000 Network have a monitoring and reporting system (47) that provides information on the updated status of their implementation in the territory. Rural police are represented by SEPRONA, who monitor operations in the forests but also in agricultural land or urban land related to TOF sourcing, as they oversee any matter related to trees and environment.
Risk Rating	Low Risk

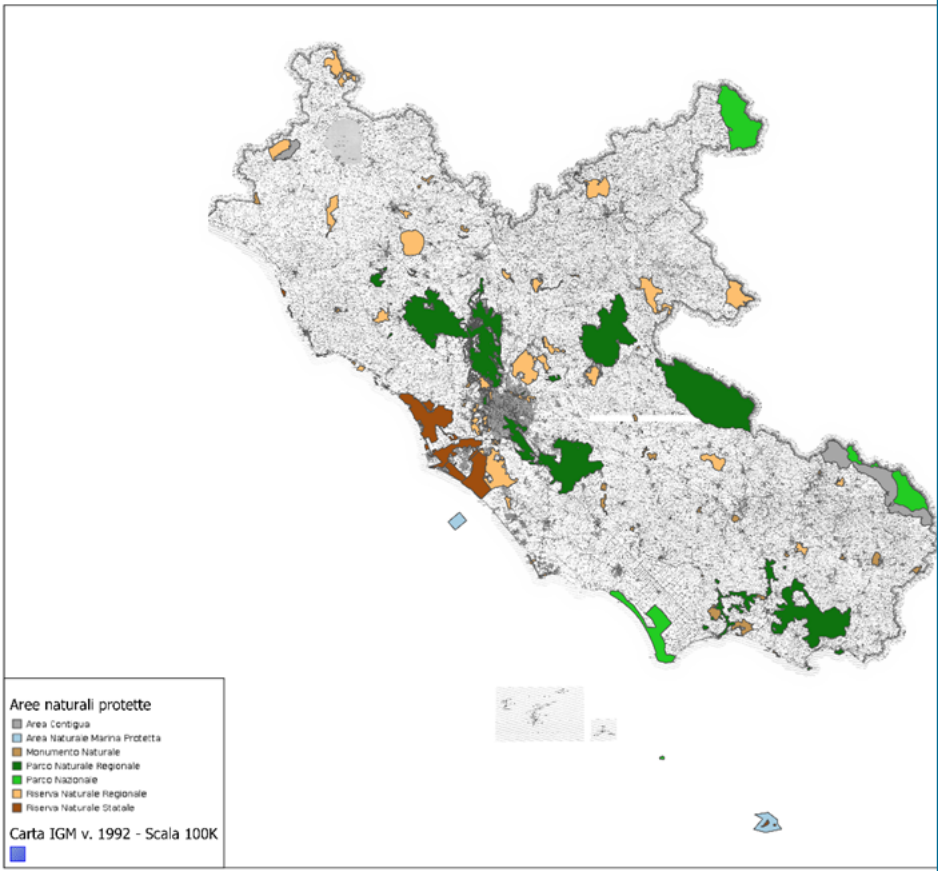
Spain 6 regions in East and South Spain	Indicator
2.1.2	Threats to and impacts on the identified key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified and evaluated.
Supply Base Verifiers	Nature 2000 sites viewer: https://natura2000.eea.europa.eu/ ("threats and pressure" section of the site details) Law 42/2007, of December 13, on Natural Heritage and Biodiversity: https://www.boe.es/buscar/act.php?id=BOE-A-2007-21490 Natura 2000 Network https://www.miteco.gob.es/ca/biodiversidad/temas/espaciosprotegidos/rednatura-2000/rn_espana.aspx Statistics and maps on Nature in Spain: https://www.miteco.gob.es/ca/biodiversidad/servicios/bancodatosnaturaleza/default.aspx FSC-NRA-ES V1-1 https://ic.fsc.org/en/document-center/id/309 Data of Sites of Community Importance (LIC): https://www.miteco.gob.es/ca/biodiversidad/temas/espaciosprotegidos/

	red- natura-2000/rn_pres_tipos_lugares_LIC.aspx Forest Map of Spain Ministerio para la Transición Ecológica (Ministry for Ecological Transition) https://www.miteco.gob.es/es/biodiversidad/servicios/banco-datosnaturaleza/servidor-cartografico-wms-/default.aspx Areas of Special Protection for Birds (ZEPA), Ministry for Ecological Transition https://www.miteco.gob.es/es/biodiversidad/temas/espaciosprotegidos/rednatura-2000/zepa.aspx. Over view of protected areas in Spain. Ministry for Ecological Transition) https://www.miteco.gob.es/es/biodiversidad/temas/espaciosprotegidos/Map of watersheds and selected priorities (December 2001) of the Plan of Prioritized Actions to Hydrological and Forest Restoration, Soil Erosion Control and Combating Desertification. http://www.magrama.gob.es/es/desarrollo-rural/temas/politicaforestal/img_mapa_prio_tcm7-25841.gif Data on nature in the Autonomous Community of Andalusia: https://www.researchgate.net/publication/236005734_Guia_tecnica_para_la_gestion_de_materiales_forestales_de_reproduccion_en_la_revegetacion_de_riberas https://www.juntadeandalucia.es/andalucia/naturalezapaisajes.htm
Risk Rating justification	Forest autochthonous species are the key species for HCVs pertaining to biodiversity related to forests, such as birds, mammals, insects and other fauna that may benefit from shadow and availability of sites of refuge amongst the trees and the clearing within the forest. Besides, a few Nature 2000 sites also cover part of forests land, meaning that threats to biodiversity issues in sourcing from these areas should be addressed and mitigation measures implemented. This applies also to TOF Group 3A. Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Specified Risk

Italy Tuscany	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	Nature 2000 sites viewer: https://natura2000.eea.europa.eu/ ("threats and pressure" section of the site details) Below is the link where all the protected areas in Tuscany are located: http://www502.regione.toscana.it/geoscopio/arprot.html The search for protected areas can also be carried out by inserting the

	cadastral data of the parcels subject to forestry works.
Risk Rating justification	Forest autochthonous species are the key species for HCVs pertaining to biodiversity related to forests, such as birds, mammals, insects and other fauna that may benefit from shadow and availability of sites of refuge amongst the trees and the clearing within the forest. Besides, a few Nature 2000 sites also cover part of forests land, meaning that threats to biodiversity issues in sourcing from these areas should be addressed and mitigation measures implemented. All permits in protected areas are issued if they pass an incidence screening or appropriate assessment. Mitigation and compensation measures are enlisted in the authorization documents. For ordinary silvicultural works, compliance with certain mandatory conditions assure that there are usually no negative impacts on the habitats or species subject to protection; but some interference may be undetected both by authority and applicant (for instance nesting may occur after preliminary visit). This applies also to TOF Group 2A (except urban) and 3A. Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Specified Risk

Italy Apulia	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	Nature 2000 sites viewer: https://natura2000.eea.europa.eu/ ("threats and pressure" section of the site details)
Risk Rating justification	Olive trees are the key species for a peculiar area of HCV pertaining to landscape, but there is also a peculiar biodiversity related to the olive trees orchards, mainly insects and other fauna that may benefit from shadow and availability of sites of refuge amongst the olive trees and the dry stone walls, that often surround orchards. Monumental olive trees enhance these benefits, as they are old trees with multiple ecological niches, more than the young olive trees. Besides, a few Nature 2000 sites (for instance Site code IT9120002 and Site code 9130005) also cover part of agricultural land, where olive trees orchard can be found, meaning that threats to biodiversity issues in sourcing from these areas should be addressed and mitigation measures implemented.
Risk Rating	Specified Risk

Italy Lazio	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	Nature 2000 sites viewer: https://natura2000.eea.europa.eu/ ("threats and pressure" section of the site details)
Risk Rating justification	Below is the map where all the protected areas in Lazio are located:  Source: Aree naturali protette — geoportale.regione.lazio.it Forest autochthonous species are the key species for HCVs pertaining to biodiversity related to forests, such as birds, mammals, insects and other fauna that may benefit from shadow and availability of sites of refuge amongst the trees and the clearing within the forest. Besides, a few Nature 2000 sites also cover part of forests land, meaning that threats to biodiversity issues in sourcing from these areas should be addressed and mitigation measures implemented. All permits in protected areas are issued if they pass an incidence screening

	or appropriate assessment. Mitigation and compensation measures are enlisted in the authorization documents. For ordinary silvicultural works, compliance with certain mandatory conditions assure that there are usually no negative impacts on the habitats or species subject to protection; but some interference may be undetected both by authority and applicant (for instance nesting may occur after preliminary visit). This applies also to TOF Group 2A (except urban) and 3A. Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance of all requirements.
Risk Rating	Specified Risk

Italy Emilia-Romagna	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	Nature 2000 sites viewer: https://natura2000.eea.europa.eu/ ("threats and pressure" section of the site details) Below is the link where all the protected areas in Emilia-Romagna are located: https://ambiente.regione.emilia-romagna.it/it/parchi-natura2000/consultazione/cartografia-interattiva The search for protected areas can also be carried out through the regional geoportal: https://geoportale.regione.emilia-romagna.it/catalogo/dati-cartografici/ambiente/aree-protette
Risk Rating justification	Forest autochthonous species are the key species for HCVs pertaining to biodiversity related to forests, such as birds, mammals, insects and other fauna that may benefit from shadow and availability of sites of refuge amongst the trees and the clearings within the forests. A few Nature 2000 sites cover part of forests land, meaning that threats to biodiversity issues in sourcing from these areas are addressed and mitigation measures must be implemented in sourcing timber. All permits in protected areas are issued if they pass an incidence screening or appropriate assessment. Mitigation and compensation measures are enlisted in the authorization documents. For ordinary silvicultural works outside protected areas, compliance with certain mandatory conditions assure that there are usually no negative impacts on habitats or species subject to protection; but some interference may be undetected both by authority and applicant (for instance nesting may occur after preliminary visit).
Risk Rating	Specified Risk

Italy Lombardy	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	Nature 2000 sites viewer: https://natura2000.eea.europa.eu/ ("threats and pressure" section of the site details) Regional Law No. 28/2016 Reorganization of the Lombardy system for the management and protection of regional protected areas and other forms of protection in the region https://normelombardia.consiglio.regione.lombardia.it/normelombardia/Accessibile/main.aspx?view=showdoc&iddoc=lr002016111700028 Regional Conservation measures for protected areas https://www.regione.lombardia.it/wps/portal/istituzionale/HP/DettaglioReazionale/servizi-e-informazioni/Enti-e-Operatori/ambiente-ed-energia/Parchi-e-aree-protette/biodiversita-e-reti-ecologiche/misure-conservazione-sic-e-zsc/misure-conservazione-sic-e-zsc State of the environnement in Lombardy https://www.regione.lombardia.it/wps/portal/istituzionale/HP/DettaglioAT/istituzione/amministrazione-trasparente/informazioni-ambientali/stato-dell-ambiente/stato-dell-ambiente Biodiversity observatory: http://www.biodiversita.lombardia.it
Risk Rating justification	Regional Law No. 28/2016 reorganizes management system of protected areas and improves the effectiveness of protection. Thanks to this law, management of Natura 2000 sites passes from parks authorities to other specific management bodies, with some exceptions for sites managed by ERSAF (National Agency for the Protection of Natural Resources and Forests) or scientific institutes. The law also establishes the procedures for the parks to take over management of the sites and for updating the related resolutions. For each site species are listed, according to IUCN and alla data are then collected in the Lombardy Biodiversity Observatory database, that includes distribution of each species across the region. Protected areas are subject to regional Conservation measures ('Misure di Conservazione', approved between 2013 and 2016, then updated in 2025) that may rule even more strictly than the European and national laws/regulations. For each site species are listed, according to IUCN and alla data are then collected in the Lombardy Biodiversity Observatory database, that includes

	distribution of each species across the region. All permits in protected areas are issued if they pass an incidence screening or appropriate assessment. Mitigation and compensation measures are enlisted in the authorization documents. For ordinary silvicultural works, compliance with certain mandatory conditions assure that there are usually no negative impacts on the habitats or species subject to protection; but some interference may be undetected both by authority and applicant (for instance nesting may occur after preliminary visit). This applies also to TOF Group 2A (except urban) and 3A. Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Specified Risk

Italy Veneto	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	Nature 2000 sites viewer: https://natura2000.eea.europa.eu/ ("threats and pressure" section of the site details) Territorial planning regarding areas with HCV: https://www.regione.veneto.it/web/agricoltura-e-foreste/piani-gestione-zps https://www.regione.veneto.it/web/agricoltura-e-foreste/misure-conservazione Forestry management in areas with HCV (Regional Decree DGR 7/2018): https://www.regione.veneto.it/web/agricoltura-e-foreste/gestione-forestale (SECTION VINCA e gestione forestale)
Risk Rating justification	Forest autochthonous species are the key species for HCVs pertaining to biodiversity related to forests, such as birds, mammals, insects and other fauna that may benefit from shadow and availability of sites of refuge amongst the trees and the clearing within the forest. Besides, a few Nature 2000 sites also cover part of forests land, meaning that threats to biodiversity issues in sourcing from these areas should be addressed and mitigation measures implemented. All permits in protected areas are issued if they pass an incidence screening or appropriate assessment. Mitigation and compensation measures are enlisted in the authorization documents. For ordinary silvicultural works, compliance with certain mandatory conditions assure that there are usually no negative impacts on the habitats or species subject to protection; but some interference may be undetected both by authority and applicant (for instance nesting may occur after preliminary visit).

	This applies also to TOF Group 2A (except urban) and 3A. Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Specified Risk

Italy Emilia-Romagna	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	National and regional legal framework; Felling licenses and other authorizations
Risk Rating justification	There is a systematic legal framework, with action plans implemented at government level to manage the main problems detected and a data monitoring network both at European level (European Forest Damage Monitoring Network) and national level (<i>Osservatorio foreste dell'INEA</i>). In addition, the level of control by the forest authority is high throughout the whole country. Therefore, the regulations and the surveillance procedures carried out by the Italian Regions are detailed and biodiversity monitored and protected for each area. Protected areas cannot decrease, but only increase in surface and/or number of protected HCV; this means that mandatory rules are issued for forest works that assure at least maintenance of HCV, but also enhancement (for instance of birds species population).
Risk Rating	Low Risk

Italy Lazio	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	National and regional legal framework; Felling licenses and other authorizations
Risk Rating justification	There is a systematic legal framework, with action plans implemented at government level to manage the main problems detected and a data monitoring network both at European level (European Forest Damage Monitoring Network) and national level (<i>Osservatorio foreste dell'INEA</i>). In addition, the level of control by the forest authority is high throughout the whole country. Therefore, the regulations and the surveillance procedures carried out by the Italian Regions are detailed and biodiversity monitored and protected for each area.

	Protected areas cannot decrease, but only increase in surface and/or number of protected HCV; this means that mandatory rules are issued for forest works that assure at least maintenance of HCV, but also enhancement (for instance of birds species population). This applies also to TOF Group 2A (except urban) and 3A.
Risk Rating	Low Risk

Italy Apulia	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	-Manager of the Phytosanitary Observatory Decree n. 50, date May 17Th 2023, regarding measures to re-plant olive trees within the infected zone, as stated in article 3 of the interministry Decree n. 2484/2020 (descending from national Law n. 44/2019 “Extraordinary Plan for regeneration of olive trees in Apulia”). DDS n. 50 del 17.05.2023 a firma del Dirigente della Sezione Osservatorio Fitosanitario del Dipartimento Agricoltura della Regione Puglia. Misura “Reimpianto olivi zona infetta” di cui all’art. 6 del Decreto Interministeriale n. 2484/2020, di attuazione delle disposizioni di cui all’articolo 8-quater della Legge 21 maggio 2019, n. 44, relativo all’attuazione del “Piano straordinario per la rigenerazione olivicola della Puglia”. -Evaluation of the <i>Xylella fastidiosa</i> emergency within the Apulia Region, final document approved by the Agriculture Commission of the House of the Representative of the Italian Parliament. Indagine conoscitiva sull'emergenza legata alla diffusione della <i>Xylella fastidiosa</i> nella regione Puglia. DOCUMENTO CONCLUSIVO APPROVATO DALLA COMMISSIONE AGRICOLTURA della Camera dei Deputati. https://www.camera.it/leg18/824?tipo=A&anno=2019&mese=02&giorno=21&view=&commissione=13#data.20190221.com13.allegati.all00010 -Extraordinary Plan for olive trees regeneration in Apulia, date March 2020 (Piano straordinario per la rigenerazione olivicola della Puglia) https://www.regione.puglia.it/documents/736605/736613/DI+firmato-PianoXylella+06-03-2020.pdf/5fc2e197-b8de-c55b-9c21-f3c52fe40a14?t=1609006848145
Risk Rating justification	At national and regional level, re-planting of olive trees with resistant varieties is not mandatory by law as eradication follows an extraordinary cause (that's

	way it can be rated as a specific risk). Anyway, grants are only given to applicants who eradicate and re-plant the same or a bigger number of trees, meaning that all professional farmers apply for economic contribution from the Puglia Region. Besides, olive oil demand trend makes it profitable to follow up the crop, as it has been for centuries, so much that Apulian landscape has been shaped upon the olive trees orchard and the local economy is related to the production of olive oil (oil mills, glass industries, etc.).
Risk Rating	Specified Risk

Italy Tuscany	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	National and regional legal framework; Felling licenses and other authorizations.
Risk Rating justification	There is a systematic legal framework, with action plans implemented at government level to manage the main problems detected and a data monitoring network both at European level (European Forest Damage Monitoring Network) and national level (Osservatorio foreste dell'INEA). In addition, the level of control by the forest authority is high throughout the whole country. Therefore, the regulations and the surveillance procedures carried out by the Italian Regions are detailed and biodiversity monitored and protected for each area. Protected areas cannot decrease, but only increase in surface and/or number of protected HCV; this means that mandatory rules are issued for forest works that assure at least maintenance of HCV, but also enhancement (for instance of birds species population). This applies also to TOF Group 2A (except urban) and 3A.
Risk Rating	Low Risk

Spain 6 regions in East and South Spain	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	National and regional legal framework; Felling licences and other authorizations
Risk Rating justification	There is a systematic legal framework, with action plans implemented at government level to manage the main problems detected and a data monitoring network both at European level (European Forest Damage Monitoring Network) and national level (2021 Annuary of forest data,

	“Anuario de estadística forestal” 2021) by the Ministry (Ministerio para la Transición Ecológica y el Reto Demográfico). In addition, the level of control by the forest authority is high throughout the whole country. Therefore, the regulations and the surveillance procedures carried out by the Autonomous Communities are detailed and biodiversity monitored and protected for each area. Protected areas cannot decrease, but only increase in surface and/or number of protected HCV; this means that mandatory rules are issued for forest works that assure at least maintenance of HCV, but also enhancement (for instance of birds species population). Spain forest area has increased over the last 25 years at a rate of 180 thousand hectares per year and currently occupies 54% of the national area. This applies also to TOF Group 3A.
Risk Rating	Low Risk

Italy Veneto	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	National and regional legal framework; Felling licenses and other authorizations.
Risk Rating justification	There is a systematic legal framework, with action plans implemented at government level to manage the main problems detected and a data monitoring network both at European level (European Forest Damage Monitoring Network) and national level (Osservatorio foreste dell'INEA). In addition, the level of control by the forest authority is high throughout the whole country. Therefore, the regulations and the surveillance procedures carried out by the Italian Regions are detailed and biodiversity monitored and protected for each area. Protected areas cannot decrease, but only increase in surface and/or number of protected HCV; this means that mandatory rules are issued for forest works that assure at least maintenance of HCV, but also enhancement (for instance of birds species population). This applies also to TOF Group 2A (except urban) and 3A.
Risk Rating	Low Risk

Italy Lombardy	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	National and regional legal framework;

	Felling licenses and other authorizations. Regional Ecological Network: https://www.regione.lombardia.it/wps/portal/istituzionale/HP/DettaglioRedazionale/servizi-e-informazioni/enti-e-operatori/ambiente-ed-energia/parchi-e-aree-protette/biodiversita-e-reti-ecologiche/rete-ecologica-regionale/rete-ecologica-regionale Atlas of ZPS (Special Protection Zones) in Lombardy: https://flanet.org/wp-content/uploads/2021/07/Atlante-delle-Zone-di-Protezione-Speciale-della-Lombardia.pdf
Risk Rating justification	There is a systematic legal framework, with action plans implemented at government level to manage the main problems detected and a data monitoring network both at European level (European Forest Damage Monitoring Network) and national level (Osservatorio foreste dell'INEA). In addition, the level of control by the forest authority is high throughout the whole country. Therefore, the regulations and the surveillance procedures carried out by the Italian Regions are detailed and biodiversity monitored and protected for each area. As in Italy Protected areas can only increase in surface and/or number of protected HCV, strict conservation measures are part of the harvesting permits in forest works in order to maintain HCVs, but also enhance them (for instance increase birds species population). Regional Spatial Plan of Lombardy pinpoint the Regional Ecological Network (RER) as a priority in regional and local planning. The RER provides a strong framework of the key elements of ecosystem, evaluating strengths, opportunities, and threats. Provides also guidance for lower levels of planning, such as provincial Plans and municipal Plans. It is linked to the Regional Ecological Network (PTR) that is the framework for provincial Plans and municipal Plans, setting targets on the base of needs of ecological rebalancing. The RER documents illustrate the Network structure and elements, at 1:25,000 scale. This applies also to TOF Group 2A (except urban) and 3A.
Risk Rating	Low Risk

Spain 6 regions in East and South Spain	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	Species list of Duferco and its suppliers Approved Forest Management plan or relevant Felling licence Review of orthophotos from flights prior to 2008 and after Existing legal framework

Risk Rating justification	Spain has a clear legal framework and records on both the conversion of native forests into plantations (prohibited), and the conversion of forests into non-forest lands (authorisation needed). Changes in use from forestry to agriculture must be authorised by the Directorate General for the Natural Environment. The authorisation of changes in forest use is regulated at the state level by the Forestry Law (Law 43/2003 on Forestry, amended by Laws 10/2006, of 28 April and 21/2015, of 20 July), which states in: Article 40, on Change in forest use and modification of vegetation cover: “The change in forest use of a forest when it is not brought about by reasons for general interest, and without prejudice to the provisions of article 18.4 and the applicable environmental regulations, shall be exceptional and shall require a favourable report from the competent forestry body and, where applicable, from the owner of the forest.” Article 6 the concept of change in forest use as: “any material action of administrative act that causes the forest to lose its character as such”. Therefore, this is an exceptional situation that requires the express authorisation of the competent authorities. The change to agricultural use could be authorised in those areas that have had a previous agricultural use. For other types of changes, conversion is only authorised in the case of special public interest. Eucalyptus is recognised as an invasive species in “The Andalusian Programme for the Control of Invasive Alien Species”. Since 1992 measures have been taken to approach the task of recovering areas of public forests. Since that year, eucalyptus has not been used in reforestation in public forests and thousands of hectares of eucalyptus have been recovered. Conversion of native forests with eucalyptus is low risk in Andalucía and other regions for over a decade. Spanish law currently prohibits the conversion of natural forests to plantations or other non-forest land uses and such conversion does not currently occur in Spain (according to data from FAO, MAPA and SECF). Article 50 of Law 21/2015 on Forestry stipulates that the Autonomous Communities must guarantee the conditions for the restoration of burned forest land, and the following is prohibited: - change in forest use for at least 30 years. Any activity inconsistent with the regeneration of the forest canopy, during the period determined by regional legislation. This applies also to TOF Group 3A. Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Specified Risk

Italy Tuscany	Indicator
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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	Public sources of aerial views from years before 2008.
Risk Rating justification	Since 2000 forest conversion is forbidden by the Forestry Law. There are very few wetlands, peatlands, highly biodiverse grasslands in Tuscany, but Duferco doesn't produce any kind of biomass from these sites. Land conversion should be checked in the public databases with the aerial views historical series, lot by lot. This applies also to TOF Groups 2A, 3A. Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Specified Risk

Italy Apulia	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	Satellite images from the past, years before 2008.
Risk Rating justification	There are no wetlands, peatlands, highly biodiverse grasslands in Apulia. As for forests, land conversion to olive trees orchard should be checked in the public databases (aerial views), lot by lot.
Risk Rating	Specified Risk

Italy Lazio	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	Public sources of aerial views from years before 2008.
Risk Rating justification	Forest conversion is generally forbidden by the Regional Forestry Law of 2002. It may be authorized in a few cases and it must be compatible with the conservation of biodiversity, with the stability of the land, with the water regime, with the protection from avalanches and rockfall, with the protection of the landscape, with the action of windbreaks and local environmental health. There are very few wetlands, peatlands, highly biodiverse grasslands in Lazio, but Duferco doesn't produce any kind of biomass from these sites. Land conversion should be checked in the public databases with the aerial views historical series, lot by lot.

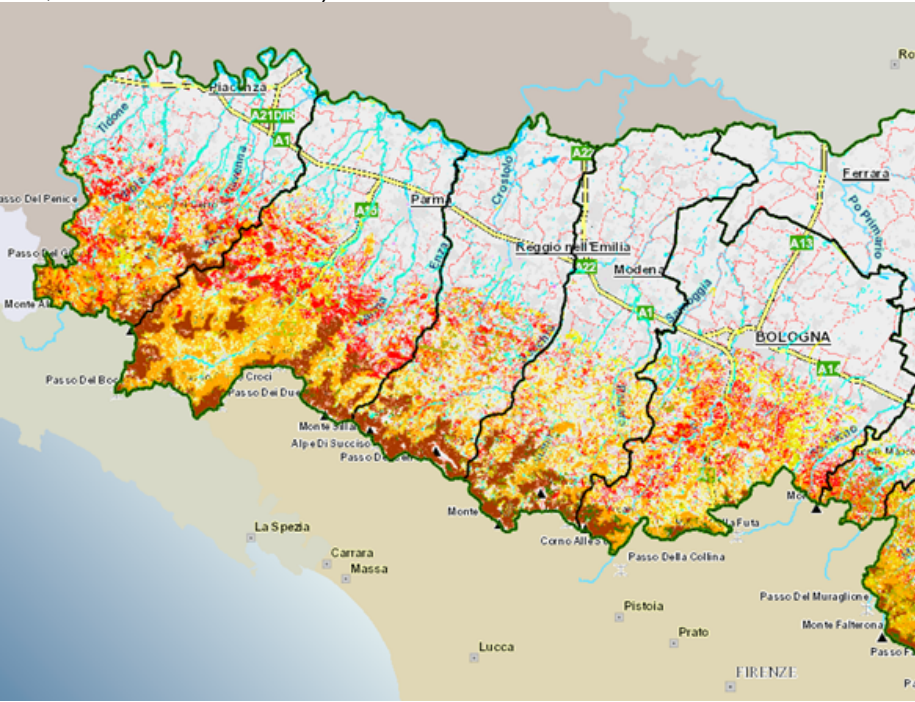
	This applies also to TOF Groups 2A, 3A. Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Specified Risk

Italy Emilia-Romagna	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	N/A
Risk Rating justification	Forest conversion is usually forbidden by the Forestry Law, unless there is a specific public need. To authorize the cases of significant public purpose envisaged by current legislation that require forest conversion, the Region has regulated compensatory interventions which, in line with Article 8 of Legislative Decree No. 34/2018 and Article 34 of Regional Law No. 21/2011, protect the landscape and forest heritage of Emilia-Romagna. There are very few wetlands, peatlands, highly biodiverse grasslands in Emilia-Romagna, but Duferco doesn't produce any kind of biomass from these sites, but anyway if land conversion occurred, it should be checked in the public databases with the aerial views historical series, lot by lot.
Risk Rating	Specified Risk

Italy Lombardy	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	Criteria set by Regional Law 31/2008, article 43 https://www.regione.lombardia.it/wps/wcm/connect/18748df2-0da3-4edc-bcb5-4ee25eed2452/Allegato_2_Criteri+per+la+trasformazione+del+bosco_dgr_6090_2016_dgr_675_2005.pdf?MOD=AJPERES&CACHEID=ROOTWORKSPACE-18748df2-0da3-4edc-bcb5-4ee25eed2452-IGPJ1p7 Public sources of aerial images, such as PCN (Environment Ministry Portal) http://www.pcn.minambiente.it/viewer/
Risk Rating justification	In Lombardy forest conversion is not allowed, unless it is one of few specific cases, regulated by the Forestry Law, under re-planting or re-funding compensation. It must be verified if forest conversion took place or not, through public satellite images browsing for each forest sourcing area.

	There are very few wetlands, peatlands, highly biodiverse grasslands in Lombardy, but Duferco doesn't produce any kind of biomass from these sites. This applies also to TOF Groups 2A, 3A. Forest sites and TOF lots are visited in order to fill in technical evaluation about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Specified Risk

Italy Veneto	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	Public sources of aerial views from years before 2008. -Regional Forestry Law no. 52/78 https://www.consiglio Veneto.it/web/crv/dettaglio-legge?catStruttura=LR&anno=1978&numero=52&tab=vigente - Regional Forestry Regulation n. 2/2020 https://bur.regione.veneto.it/BurvServices/pubblica/DettaglioRegolamento.aspx?id=413790
Risk Rating justification	In Veneto forest conversion is generally forbidden since 1978. It is allowed in few extraordinary situations, detailed and regulated by the Forestry Law. In Veneto there are two big areas of wetlands with highly biodiverse grasslands in Veneto, that are the Venice lagoon and the River Po delta. No conversion is allowed and no timber is sourced from these areas. The Venice Lagoon is also part of the UNESCO site Venice and the lagoon, with restrictions about any activity. Also wetlands and peatlands are protected, mostly as Nature 2000 sites, and their conversion is forbidden. Duferco doesn't produce any kind of biomass from these sites. Land conversion should be checked in the public databases with the aerial views historical series, lot by lot. This applies also to TOF Groups 2A, 3A. Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Specified Risk

Italy Emilia-Romagna	Indicator
2.2.2	Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.
Supply Base Verifiers	- National and regional legal framework; - Regional Forest service https://ambiente.regione.emilia-romagna.it/it/parchi-natura2000/foreste/pianificazione-forestale Study presented at Giornata internazionale delle foreste https://ambiente.regione.emilia-romagna.it/it/notizie/attualita/2025/marzo/il-21-marzo-e-la-giornata-internazionale-delle-foreste
Risk Rating justification	According to different studies it's widely recognized that Emilia-Romagna forests have grown during last decades. Emilia-Romagna is covered by woodlands for approximately 640,000 hectares, equal to 28% of the whole regional surface, mainly composed by deciduous species (approximately 610,000 ha of broadleaves) .  https://servizimoka.regione.emilia-romagna.it/mokaApp/apps/FORESTEHTM5/index.html Because of the role in climate change mitigation and ecosystem services provision as well as the growing importance of the forestry sector, all the wooded surfaces are constantly monitored through the regional Forest Information System.

	In the last decades forests have sensibly increased (20% more in surface in the last thirty years), primarily thanks to the changes occurred in land economy, with the abandonment of marginal agricultural lands over the mountain and hill areas and the following natural recolonization by vegetation, soon becoming forest. This positive trend in forest cover contributes significantly to carbon sequestration, soil protection, water regulation and biodiversity conservation.
Risk Rating	Specified Risk

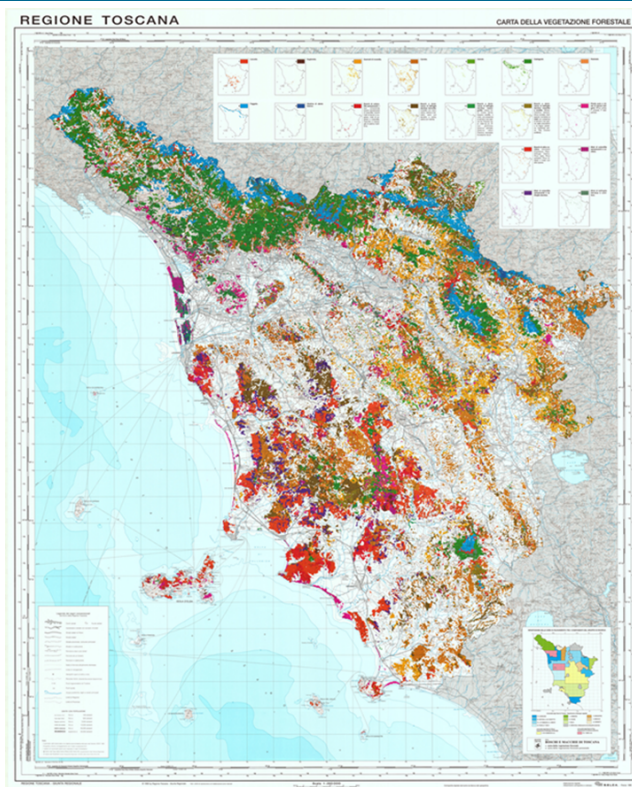
Italy Lazio	Indicator
2.2.2	Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.
Supply Base Verifiers	-National and regional legal framework; Structural diversity of forest in Lazio – ISPRA; link: R_183_2013_StructuralDiversityofForestsInLazio_r.pdf). Source: (PDF) Map of the natural and semi-natural environments and forest types map for the Latium region (Italy) (Chirici G, Fattori C, Cutolo N, Tufano M, Corona P, Barbatì A, Blasi C, Copiz R, Rossi L, Biscontinì D, Ribera A, Morgante L, Marchetti M, 2014. La realizzazione della carta delle formazioni naturali e semi-naturali e della carta forestale su basi tipologiche della regione Lazio. Forest@ 11: 65-71 [online 2014-04-18] URL: http://www.sisef.it/forest@/contents/?id=efor1204-011)
Risk Rating justification	Forests have grown during last decades, especially after World War I. Since the post-war era, forests are steadily and increasing in area extent, mainly due to abandonment of farmland and decline of the agricultural sector (source Structural diversity of forest in Lazio – ISPRA; link: R_183_2013_StructuralDiversityofForestsInLazio_r.pdf). Deciduous forests cover the 85.5% of the whole woodland surface, equal to 4666,387 hectares while coniferous forests cover only the 1.3% of the woodland surface. Mediterranean forests have a significance importance too, covering the 9.2% of the total. Lazio's forests, according the syntaxonomical classification system, can be grouped within the following main types: · Mediterranean evergreen forest (<i>Quercetalia ilicis</i>) · Thermophilous deciduous oak woods and other mixed forests (<i>Quercetalia pubescentis petraeae</i>) · Montane beech woods and other mesic forests (<i>Fagetalia sylvaticae</i>) · Hygrophilous woods (<i>Alnetalia glutinosae</i>, <i>Salicetalia purpureae</i>, <i>Populetalia albae</i>) In the present the prevalent forest types are scrub forests. These have been subjected to various kinds of disturbances and degradations such as intensive grazing and fires.

	Source: Carta forestale su base tipologica — geoportale.regione.lazio.it Forests have always covered an important role in Lazio region, since preroman period Lazio's forests have been a timber source so that both Etruscans and Romans issued forests laws and regulations. As in the rest of Italy the wooden surface started to increase after WWII due to abandonment and changes in socio-economic structure. The protected areas ensure further biodiversity and ecosystems protection and maintenance. The authorization process ensures that all the ecosystems peculiarities are maintained, protected and enhanced especially in protected areas. The management of wooded surfaces is characterized by the necessity of maintaining and/or improving forests structure in order to preserve all the services and functions related to the ecosystems themselves, to provide compliance with existing laws and regulation at national and regional level. Duferco has to collect all the authorizations and to respect all the restrictions in case of Natura 2000 sites, but some ecosystem services functions and services may be decreased by forest works. This applies also to TOF Group 2A (only landscape) and Group 3A (only wood energy crops), but the Regional Forestry Laws rule also about trees in the landscape, in order to provide protection to the agro-ecosystem. Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Specified Risk

Italy Apulia	Indicator
2.2.2	Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.
Supply Base Verifiers	Scientific article by Beshir M. Ali, Wopke van der Werf, Alfons Oude Lansink. "Assessment of the environmental impacts of <i>Xylella fastidiosa</i> subsp. <i>Pauca</i> in Puglia. Published December 2020" https://pra.eppo.int/pr/085c883e-1a78-476d-a9a3-a9bd3d97713d
Risk Rating justification	A scientific study (see section before) has been carried out in this matter and conclusions are as follows: <i>Results show that the loss of olive trees (the main woody plant in the region) in general, and of centenarian olive trees in particular, has affected Ecosystem Services delivery, estimated to diminish by 34% and 30% in the short- and long term.</i> <i>Biodiversity components are estimated to diminish by 28%, mainly due to the impact of the disease on genetic diversity and habitats of high conservation value.</i>

Risk Rating	Specified Risk
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Italy Tuscany	Indicator
2.2.2	Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.
Supply Base Verifiers	-National and regional legal framework; -According to different studies it's widely recognized that Tuscany forests have grown during last decades. Tuscany is covered by woodlands for 1.086.000 ha, equal to the 47% of the whole regional surface mainly composed by deciduous species (source: I boschi della Toscana - Regione Toscana).
Risk Rating justification	In the last century forests are sensibly increased, in particular thanks to the changes occurred in socioeconomical society structure (Piras, F.; Venturi, M.; Corrieri, F.; Santoro, A.; Agnoletti, M. Forest Surface Changes and Cultural Values: The Forests of Tuscany (Italy) in the Last Century. Forests 2021, 12, 531. https://doi.org/10.3390/f12050531). Forests importance is also evident thanks to the historical and cultural value it has got for centuries. In Tuscany there are a lot of different historical traditions maintained that are strictly related to forest management and protection, so that the wood heritage has been preserved during the centuries. In particular it has to be mentioned the monastic orders role in the forestry conservation and implementation. (source, press article: In Toscana le foreste affondano le radici nella storia - la Repubblica) Because of these reasons as well as of the growing importance covered by the forestry sector for its fundamental role in climate change mitigation, all the wooded surfaces are constantly monitored. The 10% of the regional surfaces is part of the protected areas regional system (L.R. n.30/2015) and this turns to be fundamental in terms of biodiversity conservation as well as in providing ecosystem services (Santoro A. Piras F. et al., Forest-Cover Changes in European Natura 2000 Sites in the period 2012-2018. Forests 2024; DOI: 10.3390/f15020232).



Source: (17) (PDF) Carta della vegetazione forestale della Regione Toscana. Scala 1:250.000. (researchgate.net)

The authorization process ensures that all the ecosystems peculiarities are maintained, protected and enhanced especially in protected areas. The management of wooded surfaces is characterized by the necessity of maintaining and/or improving forests structure in order to preserve all the services and functions related to the ecosystems themselves, to provide compliance with existing laws and regulation at national and regional level. Duferco has to collect all the authorizations and to respect all the restrictions in case of Natura 2000 sites, but some ecosystem services functions and services may be decreased by forest works. This applies also to TOF Group 2A (only landscape) and Group 3A (only wood energy crops), but the Regional Forestry Laws rule also about trees in the landscape, in order to provide protection to the agro-ecosystem. Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.

Risk Rating

Specified Risk

Spain
6 regions in East and South
Spain

Indicator

2.2.2	Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.
Supply Base Verifiers	Information available on high conservation values in the GIS viewers of the Autonomous Communities (Natura 2000 Network, Protected Areas, Sites of Cultural Interest) Existing legal framework. Laws, regulations and control bodies Felling licence Manual of good practices in sustainable forest management Contracts with suppliers
Risk Rating justification	In Spain there is a systematic legal framework for the protection of natural spaces and areas with high conservation values: "In accordance with Law 42/2007 on Natural Heritage and Biodiversity". These are areas of the national territory, that comply with at least one of the following requisites and are declared as such: -Contain systems or natural elements that are representative, unique, fragile, threatened or of special ecological, scientific, landscape, geological or educational interest. -Are especially dedicated to the protection and maintenance of biological diversity, geodiversity and associated natural and cultural resources." Spanish forests have a wide range of HCV in terms of biodiversity, water protection and other ecosystem services. (see 2.2.4). According to a report of the IUCN of 2013 the Biodiversity in Spain is at risk, but in 2018 a "Report about the state of biodiversity" was published by IEPNB (Spanish Inventory of Natural Heritage and Biodiversity) in accomplishment of the National Strategic Plan about Natural Heritage and Biodiversity and therefore states: "This report is intended to be a document that allows us to have basic information and summary on the state of the elements that compose our Natural Heritage and Biodiversity. It allows laying the foundations for an accurate analysis of them and a system of Indicators has been definitively implemented. This system will be the basis for the reports of the next six years that will contain an evaluation of the results achieved by the main policies adopted in the matter." All Autonomous Communities have legislation on vulnerable ecosystems: they are referred to as National Parks, Natural Parks, Nature Reserves, Natura 2000 Network Areas, Biosphere Reserves, etc. The protected area in Spain is 13% for natural areas and this increases to 28% if the Natura 2000 Network is included, with Spain being the country that contributes most to the Natura 2000 Network, the main instrument of European conservation policy. The protected areas cover both public and private forests. The Autonomous Communities have a wealth of information both on websites and in viewers and geographic information (GIS) on protected areas, priority ecosystems and habitat (Natura 2000 Network). All Autonomous Communities are preparing or have already a strategy for Biodiversity and Red Natura 2000 for horizon 2030. In Aragon a Forest Plan of Aragon for 2030 is in elaboration at the moment taking into account the strategy for biodiversity. "The Forestry Administration

has highlighted the importance of the need for adequate consideration of sustainable uses in the management of biodiversity, particularly in the areas of the framework of the Protected Natural Spaces, as well as of the spaces included in the Natura 2000 Network where forest use covers an area of 1.372.028 hectares, which represents more than three quarters of those spaces.“

Aragon states that “The existing overlap in the territory between the ENP (Espacios Naturales Protegidos) and the Natura 2000 Network makes it necessary to improve coordination between the two protection models. But there is also a need to improve coordination between the two spaces and management the fact that practically all the ENPs and 80% of the forest areas are located in the Natura 2000 Network are forest lands that have the condition of forest. This coordination is all the more necessary when the circumstance is that more than half of the forest habitats that are part of the Natura Network 2000 are forests managed by the Forestry Administration and more than 1 million of hectares of forest belong to the Network of Natural Spaces and/or to the Network Natura 2000. On the other hand, these Plans are not always well oriented in relation to with Sustainable Forest Management as evidenced in the elaboration of the Aragon Forest Plan. “Also, taking into account the relevance of agricultural uses, and forestry in protected areas and the Natura 2000 network, there is a need to deepen the degree of concreteness of the management instruments. In particular, a clear distinction must be made between the conditions for application of the different types of extensive or intensive livestock farming, as well as adapt the criteria in favour of Sustainable Forest Management and planning, the use of renewable energies or the application of new technologies in the energy sector.”

Within the Civil Guard there is also the SEPRONA unit (Nature Protection Service), which carries out environmental police work. No reports have been published on relevant environmental damage related to forestry work/harvesting.

Any harvesting activity that may affect rare or endangered species has limitations specified in the “Felling licence”.

In Andalusia an integrated strategy on biodiversity was developed in 2011. With the aim of contributing to the correct application of the content of Law 42/2007, of December 13, on Natural Heritage and Biodiversity, as well as community regulations and international conventions on biodiversity conservation signed by Spain, the application guidelines of Law 42/2007 constitute guiding criteria and a good tool for effective enforcement of regulations and for coordination at the state level of actions. These guidelines, of a technical nature, are elaborated within the Committee of Wild Flora and Fauna, through working groups. In addition, other instruments with regulatory status have been developed, such as the Royal Decree on power lines or on feeding ghouls.

The government website in the biodiversity section contains documentation of guidelines.

The authorization process ensures that all the ecosystems peculiarities are

	maintained, protected and enhanced especially in protected areas. The management of wooded surfaces is characterized by the necessity of maintaining and/or improving forests structure in order to preserve all the services and functions related to the ecosystems themselves, to provide compliance with existing laws and regulation at national and regional level. Duferco has to collect all the authorizations and to respect all the restrictions in case of Natura 2000 sites, but some ecosystem services functions and services may be decreased by forest works. This applies also to TOF Group 3A (only wood energy crops). Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Specified Risk

Italy Veneto	Indicator
2.2.2	Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.
Supply Base Verifiers	Regional portal https://www.piave.veneto.it/web/temi/foreste-e-montagna Regional forest Map: https://www.regione.veneto.it/web/agricoltura-e-foreste/carta-forestale-regionale Study about state of the forests in Veneto by the Regional Conference of Agriculture and Rural Development: https://piave.regione.veneto.it/resource/resolver?resourceId=bc499348-47eb-43cb-8c1e-a3084ed88520/37.pdf
Risk Rating justification	In Veneto forests cover approximately 23% of the land area, that is over 398,000 hectares, mostly over the mountains and hills, where the percentage can reach 60%. Regional forests are the result of thousands of years of coexistence with human activity and should be considered "managed forests," meaning they are strongly influenced by past human activity that has shaped the agricultural, forestry, and pastoral landscape into highly diverse environments, biotopes, and landscapes. The Regional Forestry Map is a tool not only for describing the Veneto forest landscape, but also for supporting the planning of forestry interventions and, more generally, for territorial programming and planning needs. Forests in Veneto have been constantly increasing in the last decades; a study commissioned by the Regional Conference of Agriculture and Rural Development in 2020 states that in 10 years (from 2005 to 2015) forests in Veneto have increased by 4,2% (and average in Italy is +4,9%), see Table 1

below.

Tab. 1 - Variazione della superficie forestale in Veneto e Italia n

	Veneto
<i>INFC2005</i>	
Bosco (ha)	397.889
Altre terre boscate (ha)	48.967
Superficie forestale totale (ha)	446.856
<i>Proiezioni INFC2015</i>	
Bosco (ha)	414.361
Altre terre boscate (ha)	51.264
Superficie forestale totale (ha)	465.624
Superficie territoriale (ha)	1.839.122
<i>Variazione 2005-2015</i>	
Superficie (ha)	+18.768
Percentuale (%)	+4,2%
Fonte: ns elaborazione da dati RAFItalia 2017-2018.	

Risk Rating

Low Risk

Italy Lombardy	Indicator
2.2.2	Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.
Supply Base Verifiers	-National and regional legal framework about protected areas Lombardy Region state of the forests: https://www.ersaf.lombardia.it/foreste/filiera-bosco-e-legno/rapporto-stato-delle-foreste/
Risk Rating justification	Forests health is pictured every year in the Report on the State of Lombardy Forests that is provided by ERSAF, as set by Regional Law No. 31/2008. The aim is to give full information about the current situation of Lombardy forests and the related forestry sector, with information and statistical data. Data sources are the official ones from Lombardy Region (SisCO, SITaB, Geoportale della Lombardia, General Directorates, ARPA, INFC2015, etc.) and also from corporate associations, forestry companies, forestry consortia, the Carabinieri Forestali, research institutions, and other forestry authorities. Lombardy forest cover is over 618.000 ha (2023 data), that is 26% of the

whole regional surface, storing 3.1 M ton of carbon dioxide each year.

2023

<i>Superficie a bosco</i>	618.403 ha
<i>Bosco pro capite</i>	617 mq
<i>Tasso di boscosità regionale</i>	26%
<i>Incremento annuo (massa)</i>	3.648.578 mc
<i>Serbatoio forestale CO₂</i>	108,9 M ton
<i>Assorbimento annuo CO₂</i>	3,1 M ton
<i>Pioppeti</i>	28.525 ha

The Report includes data about the increase of forest cover in the last decades. Almost 26.000 hectares more are forested since 2000:

<i>Periodo</i>	<i>Variazione tot. (ha)</i>	<i>Variazione media annua (ha)</i>
2000-2007	+6.923,5	+989
2008 -2012	+7.162	+1.432
2013 -2015	+11.573	+3.858
2016-2018	+14.751	+4.917
2019-2021	+25.953	+8.651

The authorization process ensures that all the ecosystems peculiarities are maintained, protected and enhanced especially in protected areas. Management of wooded surfaces is allowed for maintaining and/or improving forests structure in order to preserve all the services and functions related to the ecosystems themselves, to provide compliance with existing laws and regulation at national and regional level.

Duferco collects all the authorizations and to respect all the restrictions, but some ecosystem services and functions, but still some services may be decreased by forest works.

This applies also to TOF Group 2A (only landscape) and Group 3A (only wood energy crops),

Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.

Risk Rating

Specified Risk

Spain
6 regions in East and South
Spain

Indicator

2.2.3

Soil quality in the Supply Base shall be maintained or enhanced

Supply Base Verifiers

Existing legal framework. Laws, regulations and control bodies
Available maps on the risk of erosion and desertification

	Regional Manual of good practices in sustainable forest management JRC Science for Policy report “Condition of agricultural soil: Factsheet on soil erosion”, FAO Status of the World’s Soil Resources http://www.fao.org/3/abc595e.pdf
Risk Rating justification	Soil is a fundamental component of the environment wellbeing influencing the evapotranspiration mechanisms and the emission and absorption of gases. Soil plays an extremely important role also for all the studies on global changes and carbon dioxide balance being one of the main natural carbon sink (https://www.researchgate.net/publication/252894845_The_effects_of_forest_canopies_and_of_the_underlying_soil_moisture_on_microwave_emission). Forestry operations might damage the soil structure. The compaction of forest soil is recognized as one of the major concerns of ground-based timber harvesting operations and may result in extensive and severe damage that can persist for many years after logging (Masumian, A., et al. (2023). Assessment of the impact of ground-based skidding on soil physical properties: initial effect and medium-term recovery. International Journal of Forest Engineering, 35(2), 284–295. https://doi.org/10.1080/14942119.2023.2286394). Canopy cover of a high-density forest limit erosion from rain and wind. The management of wooded surfaces is characterized by the necessity of maintaining and/or improving forests structure in order to preserve all the services and functions related to the ecosystems themselves but temporary loss of organic matter in the soil following forestry operations is also a risk. The regional law gives specific indications on how work in forestry areas and specify what it's permitted and what it's forbidden. At the same time the authorization process guarantees that damage to the forest is as little as possible, but weather condition may damage soil during forestry work. This applies also to TOF Group 3A. Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Specified Risk

Italy Tuscany	Indicator
2.2.3	Soil quality in the Supply Base shall be maintained or enhanced
Supply Base Verifiers	Project SKIDDFORW Ricerca Dipartimento di Scienze e Tecnologie Agrarie, Alimentari, Ambientali e Forestali (DAGRI) UniFI : https://www.rivistasherwood.it/filevari/2022/nl670-P2-SkiddForw_manuale.pdf Other study: https://www.researchgate.net/publication/252894845_The_effects_of_forest_canopies_and_of_the_underlying_soil_moisture_on_microwave_emission

Risk Rating justification	Soil is a fundamental component of the environment wellbeing influencing evapotranspiration mechanisms and the emission and absorption of gases. Soil plays an extremely important role also for all the studies on global changes and carbon dioxide balance being one of the main natural carbon sink (https://www.researchgate.net/publication/252894845_The_effects_of_forest_canopies_and_of_the_underlying_soil_moisture_on_microwave_emission). Forestry operations might damage the soil structure. The compaction of forest soil is recognized as one of the major concerns of ground-based timber harvesting operations and may result in extensive and severe damage that can persist for many years after logging (Masumian, A., et al. (2023). Assessment of the impact of ground-based skidding on soil physical properties: initial effect and medium-term recovery. International Journal of Forest Engineering, 35(2), 284–295. https://doi.org/10.1080/14942119.2023.2286394). Forestry operations might damage the soil structure. The compaction of forest soil is recognized as one of the major concerns of ground-based timber harvesting operations and may result in extensive and severe damage that can persist for many years after logging (Masumian, A., et al. (2023). Assessment of the impact of ground-based skidding on soil physical properties: initial effect and medium-term recovery. International Journal of Forest Engineering, 35(2), 284–295. https://doi.org/10.1080/14942119.2023.2286394). Intensive forestry operations may cause soil compaction, plastic soil disturbances and rutting, which are responsible for undesirable effects on soils, vegetation and water bodies. Despite the numerous studies aimed to identify the main factors affecting soil damages, it still remains unclear whether wood extraction methods and driving direction (uphill or downhill) may affect the impacts of forest machines. Concerning this, a specific research has been done in Tuscany region, specifically in Rincine forest, to analyse soil compaction and soil penetration resistance during the forestry works with specific vehicles (Marra E. et al., February 2022, European Journal of Forest Research; DOI: 10.1007/s10342-021-01420-w). Two Tuscany study cases were also considered in a PhD thesis with the aim of identifying a new methodological approach to observe and quantify the forestry utilization impact (https://hdl.handle.net/2158/1002411) The University of Florence has also carried out a specific project SKIDDFORW from 2019 and 2020 to determine the impact specifically related to forestry utilizations. Thanks to these specific researches it was possible to publish Guide Lines based on sustainable development goals in order to manage the wood resources without create damages to the forests themselves. Canopy cover of a high-density forest limit erosion from rain and wind. The management of wooded surfaces is characterized by the necessity of maintaining and/or improving forests structure in order to preserve all the services and functions related to the ecosystems themselves but temporary loss of organic matter in the soil following forestry operations is also a risk. The regional law gives specific indications on how work in forestry areas and
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	specify what it's permitted and what it's forbidden. At the same time the authorization process guarantees that damage to the forest is as little as possible. This applies also to TOF Group 2A (except urban) and 3A. Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Specified Risk

Italy Apulia	Indicator
2.2.3	Soil quality in the Supply Base shall be maintained or enhanced
Supply Base Verifiers	Studies in similar sites in Spain: - o Jesús Rodrigo-Comino, Encarnación Taguas, Manuel Seeger, Johannes B. Ries, Quantification of soil and water losses in an extensive olive orchard catchment in Southern Spain, Journal of Hydrology, Volume 556, 2018, Pages 749-758, ISSN 0022-1694 - o Encarnación V. Taguas, Karl Vanderlinden, Aura Pedrera-Parrilla, Juan V. Giráldez, José A. Gómez, Spatial and temporal variability of spontaneous grass cover and its influence on sediment losses in an extensive olive orchard catchment, CATENA, Volume 157, 2017, Pages 58-66, ISSN 0341-8162. Data on infected areas: https://olivoelilio.edagricole.it/attualita/cia-puglia-aree-salento-colpita-da-xylella-tra-zone-svantaggiate/
Risk Rating justification	Canopy cover of olive trees limit erosion from rain and wind; the loss of canopy cover may cause a decrease of soil quality. Temporary loss of organic matter in the soil following eradication is also a risk. Harrowing is mandatory in each olive orchard in early spring for many rural areas (listed in the annual communication), as a preventive measure to decrease the young population of the vector insect (<i>Philaenus spumarius</i>), affecting temporarily soil quality.
Risk Rating	Specified Risk

Italy Lazio	Indicator
2.2.3	Soil quality in the Supply Base shall be maintained or enhanced
Supply Base Verifiers	Regional Forestry Law: https://www.consiglio.regione.lazio.it/consiglioregionale/?vw=leggiregionalidettagli&id=8715&sv=vigente

	Regional Forestry Regulation: https://www.regione.lazio.it/regolamenti-regionali-testo-originale/regolamentoregionale-18-aprile-2005-n-7 Studies about the topic: MILLENNIUM ECOSYSTEM ASSESSMENT,2003; GLÆS NERet al., 2014 https://www.researchgate.net/publication/252894845_The_effects_of_forest_canopies_and_of_the_underlying_soil_moisture_on_microwave_emission Assessment of the impact of ground-based skidding on soil physical properties: initial effect and medium-term recovery. International Journal of Forest Engineering, 35(2), 284–295. https://doi.org/10.1080/14942119.2023.2286394).
Risk Rating justification	Management of wooded surfaces is characterized by the necessity of maintaining and/or improving forests structure in order to preserve all the services and functions related to the ecosystems themselves but temporary loss of organic matter in the soil following forestry operations is also a risk. The regional law and regulation give specific indications on how work in forestry areas and specify what it's permitted and what it's forbidden. At the same time the authorization process guarantees that damage to the forest is as little as possible. Maintaining soil quality is a priority aim at international level in order to preserve biodiversity as well as in order to mitigate climate changes (MILLENNIUM ECOSYSTEM ASSESSMENT,2003; GLÆS NERet al., 2014). The soil importance as a priority component of the environment wellbeing influencing the evapotranspiration mechanisms and the emission and absorption of gases is well known. In fact, soil plays an extremely important role also for all the studies on global changes and carbon dioxide balance being one of the main natural carbon sink. Forestry operations might damage the soil structure. The compaction of forest soil is recognized as one of the major concerns of ground-based timber harvesting operations and may result in extensive and severe damage that can persist for many years after logging (Masumian, A., et al. (2023). Assessment of the impact of ground-based skidding on soil physical properties: initial effect and medium-term recovery. International Journal of Forest Engineering. This applies also to TOF Group 2A (except urban) and 3A. Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Specified Risk

Italy Emilia-Romagna	Indicator
2.2.3	Soil quality in the Supply Base shall be maintained or enhanced
Supply Base Verifiers	

	Soil is a fundamental component of the environment wellbeing influencing the evapotranspiration mechanisms and the emission and absorption of gases. Soil plays an extremely important role also for all the studies on global changes and carbon dioxide balance being one of the main natural carbon sink (https://www.researchgate.net/publication/252894845_The_effects_of_forest_canopies_and_of_the_underlying_soil_moisture_on_microwave_emission). Forestry operations might damage the soil structure. The compaction of forest soil is recognized as one of the major concerns of ground-based timber harvesting operations and may result in extensive and severe damage that can persist for many years after logging (Masumian, A., et al. (2023). Assessment of the impact of ground-based skidding on soil physical properties: initial effect and medium-term recovery. International Journal of Forest Engineering, 35(2), 284–295. https://doi.org/10.1080/14942119.2023.2286394). Intensive forestry operations may cause soil compaction, plastic soil disturbances and rutting, which are responsible for undesirable effects on soils, vegetation and water bodies. Despite the numerous studies aimed to identify the main factors affecting soil damages, it still remains unclear whether wood extraction methods and driving direction (uphill or downhill) may affect the impacts of forest machines. Concerning this, a specific research has been done in Tuscany region, specifically in Rincine forest, to analyse soil compaction and soil penetration resistance during the forestry works with specific vehicles (Marra E. et al., February 2022, European Journal of Forest Research; DOI: 10.1007/s10342-021-01420-w). Two Tuscany study cases were also considered in a PhD thesis with the aim of identifying a new methodological approach to observe and quantify the forestry utilization impact (https://hdl.handle.net/2158/1002411) The University of Florence has also carried out a specific project from 2019 and 2020 to determine the impact specifically related to forestry utilizations. Il Progetto SKIDDFORW Ricerca Dipartimento di Scienze e Tecnologie Agrarie, Alimentari, Ambientali e Forestali (DAGRI) UniFI . Thanks to these specific researches it was possible to publish Guide Lines based on sustainable development goals in order to manage the wood resources without create damages to the forests themselves. https://www.rivistasherwood.it/filevari/2022/nl670-P2-SkiddForw_manuale.pdf
Risk Rating justification	Canopy cover of a high-density forest limit erosion from rain and wind. Management of wooded surfaces is characterized by the necessity of maintaining and/or improving forests structure in order to preserve all the services and functions related to the ecosystems themselves but temporary loss of organic matter in the soil following forestry operations is also a risk.

	The regional law gives specific indications on how work in forestry areas and specify what it's permitted and what it's forbidden. At the same time the authorization process guarantees that damage to the forest is as little as possible.
Risk Rating	Specified Risk

Italy Lombardy	Indicator
2.2.3	Soil quality in the Supply Base shall be maintained or enhanced
Supply Base Verifiers	Existing legal framework, Regional forestry Regulation: https://normelombardia.consiglio.regione.lombardia.it/NormeLombardia/Accesibile/main.aspx?exp_coll=rr002007072000005&view=showdoc&iddoc=rr002007072000005&selnode=rr002007072000005 Available maps on the risk of erosion and desertification JRC Science for Policy report "Condition of agricultural soil: Factsheet on soil erosion", FAO Status of the World's Soil Resources http://www.fao.org/3/abc595e.pdf Project SkiddForw by University of Florence: https://www.dagri.unifi.it/vp-525-il-progetto-skiddforw.html#
Risk Rating justification	Timber sourcing can create some damage to the soil, that's why Regional Forestry Regulation has detailed rules as follows: - at article 19 rules about restoration after damage to soil: - at article 23 consider protection of soil in FM Plans. A study by the University of Florence named "Good practices for the reduction of impacts during logging operations" resulted in a leaflet that is a good start for training about reducing potential damage to soil. In spite of the Regional Forestry Regulation prevention of erosion measures, erosion may occur anyway, due to machines. This applies also to TOF Group 3A. Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Specified Risk

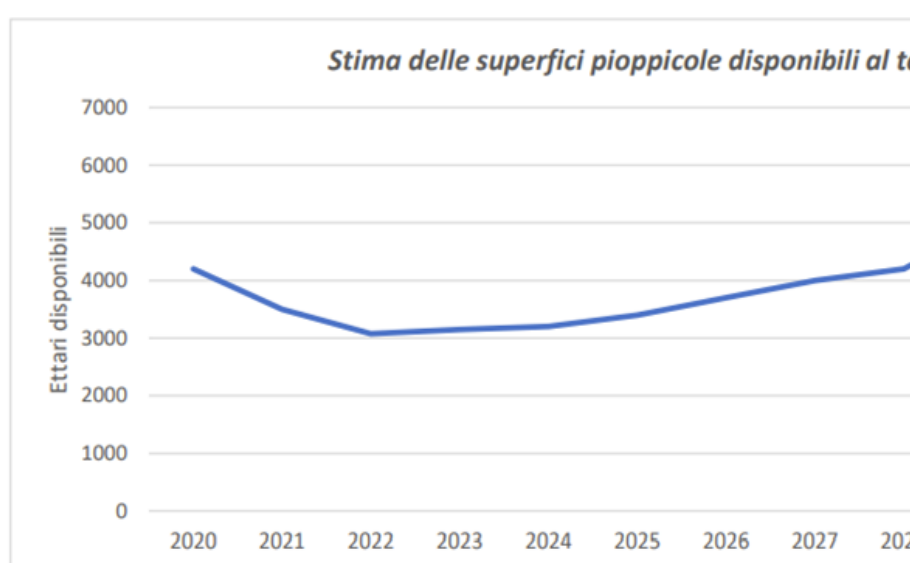
Italy Veneto	Indicator
2.2.3	Soil quality in the Supply Base shall be maintained or enhanced

Supply Base Verifiers	https://www.researchgate.net/publication/252894845_The_effects_of_forest_canopies_and_of_the_underlying_soil_moisture_on_microwave_emission Regional Forestry Regulation n. 2/2020 https://bur.regione.veneto.it/BurVServices/pubblica/DettaglioRegolamento.aspx?id=413790 Regional Handbook about forestry operations ("Prontuario"): https://www.regione.veneto.it/web/agricoltura-e-foreste/gestione-forestale (SECTION VINCA e gestione forestale) Project SkiddForw by University of Florence: https://www.dagri.unifi.it/vp-525-il-progetto-skiddforw.html#
Risk Rating justification	Soil is a fundamental component of the environment wellbeing influencing the evapotranspiration mechanisms and the emission and absorption of gases. Soil plays an extremely important role also for all the studies on global changes and carbon dioxide balance being one of the main natural carbon sink. As forestry operations might damage the soil structure, the Regional Forestry Regulation include the following ruling: - article 1: protection of stbility of the slopes and prevention of soil erosion; - article 13 and 38: no tillage of the soil is allowed; - article 18 and 19: definition of fines. A study by the University of Florence named "Good practices for the reduction of impacts during logging operations" resulted in a leaflet that is a good start for training about reducing potential damage to soil. Even if the Regional Forestry Regulation has detailed rules about prevention of erosion, in each lot forestry operations might damage the soil structure. The compaction of forest soil is recognized as one of the major concerns of ground-based timber harvesting operations and may result in extensive and severe damage that can persist for many years after logging (Masumian, A., et al. (2023). Assessment of the impact of ground-based skidding on soil physical properties: initial effect and medium-term recovery. International Journal of Forest Engineering. This applies also to TOF Group 2A (except urban) and 3A. Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Specified Risk

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	National and regional law enforcement, especially Regional Forest Regulation no. 3/2018 Venice agreement about poplar plantations (2014): https://www.regione.fvg.it/rafvig/export/sites/default/RAFVG/economia-imprese/agricoltura-foreste/foreste/FOGLIA20/allegati/13042016_accordo_pioppo_interregional_e2014_DEFINITIVO_con_firme.pdf
Risk Rating justification	National and regional law enforcement guarantee that negative impacts on the ecosystems are managed. Even in case of significant timber harvesting, it is mandatory to replace the original forest structure. According to the Regional Forest Regulation no. 3/2018 (which replaced the previous Prescrizioni di Massima e di Polizia Forestale), it is prohibited to uproot stumps, except with authorization from the competent authority in exceptional cases (Art. 14). This prohibition ensures the maintenance of soil stability and ecosystem functions. Concerning forest residues, according to Art. 20 of the Regional Forest Regulation, branches and processing residues can be maintained in the felling area or concentrated in piles in free spaces, taking care to avoid excessive stocks and not to damage natural regeneration. This practice allows the return of carbon and nutrients to the soil. In the case of coniferous forests at final stage, after harvesting, reforestation may be required according to specific site conditions and management plans. Concerning poplar plantations, as they are planted on cultivated lands, they are classified as agricultural areas with medium cultivation intensity (Art. 48, Regional Forest Regulation n. 3/2018). At the end of the production cycle, the surface can return to ordinary agricultural cultivation. Besides, an interregional agreement was signed in Venice in January 2014 by the Governors, with the crucial aim of doubling the poplar surface area of the five main Regions involved in poplar plantations (Lombardy, Veneto, Piedmont, Friuli Venezia Giulia and Emilia Romagna). It was co-signed by the 'Italian poplar growers' association, by FederlegnoArredo (association of furniture industries), by Assocarta (association of paper producers), by the CRA - research unit for woody production outside the forest (National Institute of Poplars), by farmers associations (Confagricoltura, CIA and Coldiretti). The agreement also had further goals to achieve: - ensure that poplar growers receive carbon credits corresponding to the annual sequestration capacity of greenhouse gases and the other many services carried out for the benefit of the environment and community, such as water regulation in the floodplains;

- implement poplar cultivation as part of the new strategy forestry of the EU, providing specific support interventions of poplar cultivation carried out according to sustainable cultivation practices (agro-environmental measures), as well as for interventions of environmental envisaged in the "greening" component of the Common Agricultural Policy of the EU.

This means that in no case there is an irreversible negative impact to the ecosystem, as the poplars that are planted are even more than the ones removed (see graphic below, estimation of poplar surfaces that will be available for timber sourcing in the near future).



(fonte: Terra e Vita; Edagricole)

Risk Rating	Low Risk
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Italy Lazio	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	Regional Forestry Law: https://www.consiglio.regione.lazio.it/consiglioregionale/?vw=leggiregionalidettaglio&id=8715&sv=vigente Regional Forestry Regulation: https://www.regione.lazio.it/regolamenti-regionali-testo-originale/regolamentoregionale-18-aprile-2005-n-
Risk Rating justification	National and regional law enforcement guarantee that negative impacts on the ecosystems are managed. Even in case of big timber harvesting it is mandatory to replace the original forest structure. According to national and

	regional laws, it is never allowed to remove stumps; in the case of coniferous forests at final stage, after harvesting, it is mandatory to perform reforestation. Concerning the poplar and eucalyptus groves, they are planted on cultivated lands, meaning that there is no irreversible negative impact, as it is already an agro-ecosystem. Both the plantation and the removal of plantations are not freely executable; it is mandatory to obtain authorization documents by the competent authority. The authorization guarantees the procedure accuracy, as it also considers impacts on the ecosystem, if any. Forest residues removal in Lazio is regulated by the Forest Regulation. Some impact may occur, but not in an irreversible way, according to application of forest laws. This applies also to TOF Group 2A (except urban) and 3A. Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Low Risk

Italy Apulia	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	National Plan of eradication of Xylella, Ministry Decree September 26 th 2014: Decreto Ministeriale 26 settembre 2014 “Misure di emergenza per la previsione, il controllo e l'eradicazione di Xylella fastidiosa”
Risk Rating justification	Since Xylella can affect roots, all parts of infected plants have to be removed, including stumps and roots.
Risk Rating	Specified Risk

Italy Tuscany	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	National law: - Law Decree no. 34/2008 (“Testo unico in materie di foreste e filiere forestali”) - Presidential Decree no. 11/1972, that delegates to Regions all administrative functions in agriculture and forestry (“Trasferimento alle Regioni a statuto ordinario delle funzioni amministrative statali in materia di agricoltura e foreste, di caccia e di pesca nelle acque.”) Regional laws and application of laws: -Regional Forestry Law no. 39/2000

	https://raccoltanormativa.consiglio.regione.toscana.it/articolo?urndoc=urn:nir:regione.toscana:legge:2000-03-21;39 - Regional Forestry Regulation D.P.G.R. 48/R/2003 https://raccoltanormativa.consiglio.regione.toscana.it/articolo?urndoc=urn:nir:regione.toscana:regolamento.giunta:2003-08-08;48/R
Risk Rating justification	Forest residues removal in Tuscany is limited by the Regional Law and the Forest Regulation, so forest regenerates itself and left standing trees grow at an increase rate after cuttings. The negative impact to the ecosystem is then reversible. Some impact may occur, but not in an irreversible way, according to application of forest laws. National and regional law enforcement guarantee that negative impacts on the ecosystems are managed. Even in case of big timber harvesting it is mandatory to replace the original forest structure. According to national and regional laws, it is never allowed to remove stumps; in the case of coniferous forests at final stage, after harvesting, it is mandatory to perform reforestation. Concerning the poplar and eucalyptus groves, they are planted on cultivated lands, meaning that there is no irreversible negative impact, as it is already an agro-ecosystem. Both the plantation and the removal of plantations are not freely executable; it is mandatory to obtain authorization documents by the competent authority. The authorization guarantees the procedure accuracy, as it also considers impacts on the ecosystem, if any. This applies also to TOF Group 2A (except urban) and 3A. Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Low Risk

Spain 6 regions in East and South Spain	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	National and regional law enforcement guarantee that negative impacts on the ecosystems are managed through regional Forest Services. Regional Manuals of good practices in sustainable forest management Felling licences Form "Preliminary field visit" Form "Check list" Contracts with suppliers
Risk Rating justification	The way of treating residues is well regulated in Spain. In addition, most of the regions have their own regulations on this matter and burning of residues requires prior authorization.

	As explained, the forest department carries out a previous visit to the forest before writing the authorisations of cutting, another visit during the forest works and a final visit when works have been completed. During these visits, it is verified that the process of residue removal minimises harm to ecosystems. In addition, in Spain there are environmental policies that guarantee compliance with the law in the natural areas. At national level there is SEPRONA and at the autonomous level, regions have its rural police force. This means that where the removal of harvest forest residues and / or stumps occurs, it is authorized with detailed mandatory rules and does not lead to irreversible negative impacts to the ecosystems. Furthermore, Duferco has implemented appropriate control systems and own procedures to verify the process of residue removal, when it occurs, only leads to reversible negative impact to ecosystems. This applies also to TOF Group 3A. Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Low Risk

Italy Veneto	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	Regional Forestry Regulation n. 2/2020 https://bur.regione.veneto.it/BurvServices/pubblica/DettaglioRegolamento.aspx?id=413790 Venice agreement about poplar plantations (2014): https://www.regione.fvg.it/rafv/export/sites/default/RAFGV/economia-imprese/agricoltura-foreste/foreste/FOGLIA20/allegati/13042016_accordo_pioppo_interregionale_2014_DEFINITIVO_con_firme.pdf
Risk Rating justification	National and regional law enforcement guarantee that negative impacts on the ecosystems are managed. Even in case of big timber harvesting it is mandatory to replace the original forest structure. According to national and consequently regional law, it is never allowed to remove stumps in the forests (article 29 of the regional Forestry Regulation), with some exemptions that require explicit authorization. About poplar plantations, stumps are never removed as standard practice, but trimmed into the same soil, leaving carbon stock. This applies also to TOF Group 2A (except urban) and 3A.

	Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Low Risk

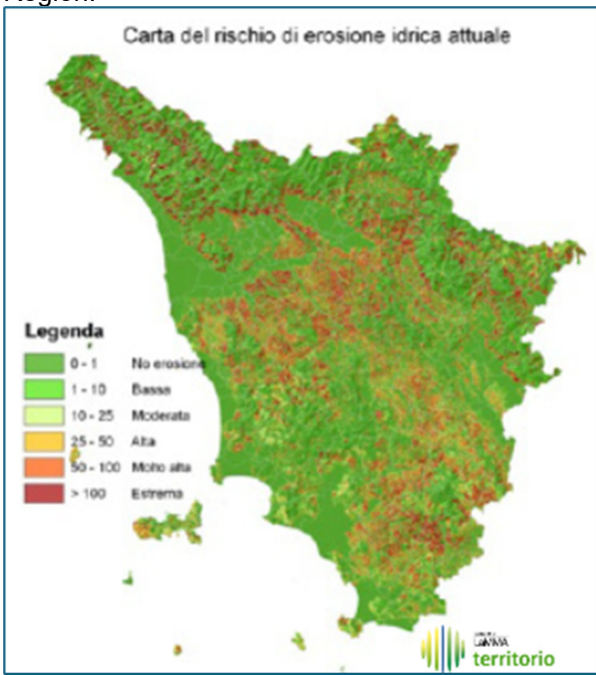
Italy Lombardy	Indicator
2.2.4	Where the removal of harvest forest residues and/or stumps occurs, this shall not lead to irreversible negative impacts to the ecosystem.
Supply Base Verifiers	Regional forestry Regulation: https://normelombardia.consiglio.regione.lombardia.it/NormeLombardia/Accesibile/main.aspx?exp_coll=rr002007072000005&view=showdoc&iddoc=rr002007072000005&selnode=rr002007072000005 Venice agreement about poplar plantations (2014): https://www.regione.fvg.it/rafv/export/sites/default/RAFVG/economia-imprese/agricoltura-foreste/foreste/FOGLIA20/allegati/13042016_accordo_pioppo_interregionale_2014_DEFINITIVO_con_firme.pdf
Risk Rating justification	National and regional law enforcement guarantee that negative impacts on the ecosystems are managed. Even in case of big timber harvesting it is mandatory to replace the original forest structure. According to national and consequently regional law, it is never allowed to remove stumps in the forests (article 29 of the regional Forestry Regulation), with some exemptions that require explicit authorization. About poplar plantations, stumps are never removed as standard practice, but trimmed into the same soil, leaving carbon stock. This applies also to TOF Group 2A (except urban) and 3A. Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Low Risk

Spain 6 regions in East and South Spain	Indicator
2.2.5	Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.
Supply Base Verifiers	Existing legal framework. Laws, regulations and control bodies Water legislation in Spain: http://www.magrama.gob.es/es/agua/legislacion/Fellinglicence Regional Manuals of good practices in sustainable forest management Field visits

	Contract with suppliers
Risk Rating justification	In Spain there are competent bodies carrying out the control tasks of the harvesting operations. The Authorization for Harvesting is issued by Forest Service of every community. Among other things, it regulates the water management in every particular case. The National Plan of Prioritized Actions to Hydrological and Forest Restoration, Soil Erosion Control and Combating Desertification, completed in 2004 and updated in 2007, is the planning instrument at the national level guiding the forest hydrological restoration actions developed by the Ministry of Agriculture, Fisheries, Food, mainly through agreements with the Autonomous Communities. This plan designates the priority watersheds and develops programs and actions to be carried out. The plan is operating globally on 18.4 million hectares, of which 3.5 million are a priority. An annex to the plan includes a map of selected watersheds and priority areas. Harvesting permits are issued by specific competent authority Consejería de Medio Ambiente y Ordenación del Territorio (Ministry of Environment and Planning). General Secretariat for Integral Management of Environment and Water, Department of Natural Spaces and Public participation. In public property areas, it is also necessary to obtain permission from the specific competent authority for the public property (e.g., watershed areas, roads, etc.). In addition, if the action affects a zone of Public Hydraulic Domain, an extra authorization to act in this area must be requested and the officers of the river basin can mark restrictions or mitigation measures. The FSC NRA for Spain states the following: "Forest activities with certain characteristics and of a certain size, as set out in the law, must have an environmental impact report prior to the request for license activity. Environmental impacts of harvesting activities, like soil or water course damage, are generally well regulated in Spanish legislation. As a major branch of forest policy in Spain has been and continues to be aimed at ensuring the supply of water in sufficient quantity and quality." SEPRONA (Nature Protection Service) or Agentes Forestales / Medioambientales (Autonomous Communities controlling officers) are the organisations dealing with inspections and law enforcement. Nature conservation societies also have an active role in Spain and there are no reports about relevant environmental damages linked to harvesting activities. This applies also to TOF Group 3A. Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Specified Risk

Italy
Tuscany

Indicator

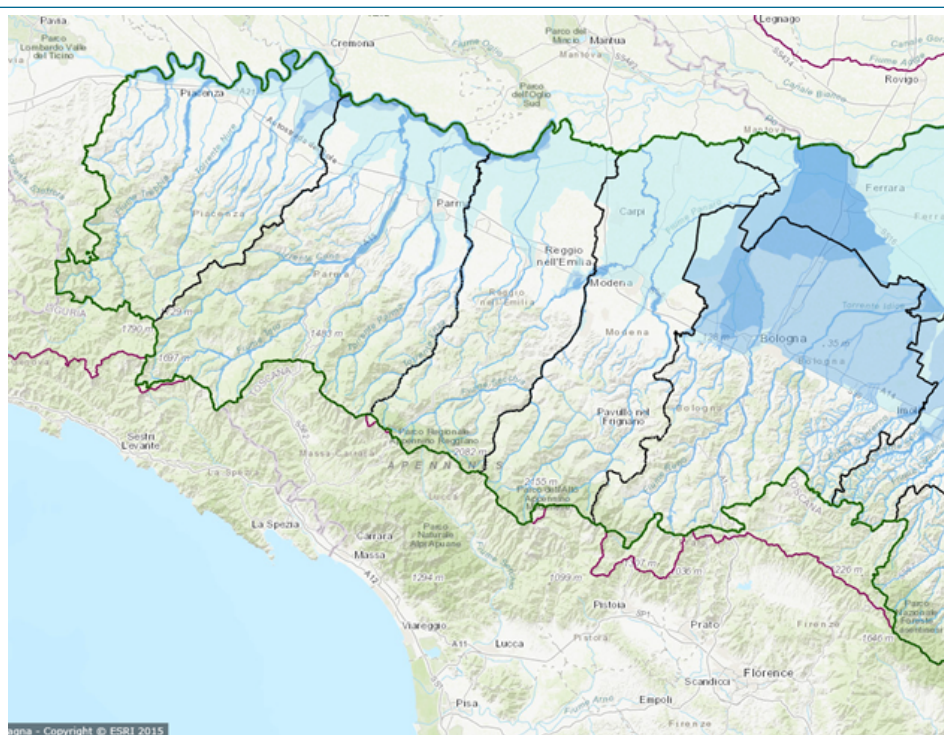
2.2.5	Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.
Supply Base Verifiers	Soil Protection: The Interactive Map - Tuscany Region https://www.regione.toscana.it/-/difesa-del-suolo-la-mappa-interattiva-1 Research activities for flood risk mitigation - Region Tuscany: https://www.regione.toscana.it/-/attivita-di-ricerca-per-lamitigazione-del-rischio-idraulico Assessment of the impact of harvesting operations on the microbiological component of the soil (researchgate.net): https://www.researchgate.net/publication/281291600_Verifica_dell'impatto_delle_operazioni_di_raccolta_sulla_componente_microbiologica_del_suolo
Risk Rating justification	The importance of environment conservation is widely recognized in Tuscany especially concerning the hydrogeological risk. Many activities to reduce the hydrogeological risk have been carried on during the last years because of the adverse meteorological phenomena becoming more frequent every year. Numerous researches are currently carrying out by Universities, research centres such as CREA and LAMMA, as well as directly by the Tuscany Region.  Forestry activities could negatively impact on the environment for example in terms of soil compaction as well as on soil morphology alteration. This could reduce the soil porosity reducing the gases exchanges and the water infiltration. Forestry Regulation details rules about the matter and also felling licences may include restrictions if needed. This applies also to TOF Group 2A (except urban) and 3A.

	Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Low Risk

Italy Apulia	Indicator
2.2.5	Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.
Supply Base Verifiers	Scientific article by Beshir M. Ali, Wopke van der Werf, Alfons Oude Lansink. “Assessment of the environmental impacts of Xylella fastidiosa subsp. Pauca in Puglia. Published December 2020” https://pra.eppo.int/pr/085c883e-1a78-476d-a9a3-a9bd3d97713d
Risk Rating justification	According to the study “Water regulation is estimated to diminish by about 16% and 20% in the short and long term, respectively. The long-term impact estimates are more uncertain than the short-term estimates due to the uncertainties regarding the future management of the landscape”.
Risk Rating	Specified Risk

Italy Lazio	Indicator
2.2.5	Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.
Supply Base Verifiers	Planning activity of District Basin Authority: https://aubac.it/attivita/pianificazione Lazio region geoportal map: https://geoportale.regione.lazio.it/maps/870
Risk Rating justification	In Lazio region the District Basin Authority (AUBAC) has mapped areas with potential risks in various municipalities; this is mandatory for an effective planning and prevention to hydrogeological instability. The regional geoportal is a source for hydrogeological information, giving detailed mapping of risks. Quantity of ground water may be affected by forestry operations in some lots, as forestry vehicles may impact on soil and temporarily waterproof it. This applies also to TOF Group 2A (except urban) and 3A. Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Specified Risk

Italy Emilia-Romagna	Indicator
2.2.5	Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.
Supply Base Verifiers	Piano di Gestione del Rischio Alluvioni (PGRA) - Flood Risk Management Plan for the Po River District and Apennine Central District, with interactive maps of flood risk areas https://ambiente.regione.emilia-romagna.it/it/suolo-bacino/sezioni/piano-di-gestione-del-rischio-alluvioni Piano Stralcio per il Rischio Idrogeologico (PAI) - Hydrogeological Risk Plan with specific regulations for water network management and slope stability https://ambiente.regione.emilia-romagna.it/it/suolo-bacino/sezioni/piani-di-bacino/autorita-bacini-romagnoli/piano-stralcio-rischio-idrogeologico "Resilient Water" project - collaboration between ARPAE, University of Bologna, and Gruppo Hera for water resource security and climate change adaptation https://www.arpae.it/it/notizie/acqua-presentato-il-progetto-resilient-water Regional Forest Regulation no. 3/2018
Risk Rating justification	Importance of environment conservation is widely recognized in Emilia-Romagna, especially concerning hydrogeological risk. The Region has developed comprehensive planning tools to address this challenge, such as Piano di Gestione del Rischio Alluvioni (PGRA) - Flood Risk Management Plan for the Po River District and Apennine Central District Piano Stralcio per il Rischio Idrogeologico (PAI) - Hydrogeological Risk Plan with specific regulations for water network management and slope stability. Many activities to reduce hydrogeological risk have been carried out during recent years, especially following the May 2023 floods and other adverse meteorological phenomena. The Region provides interactive WebGIS maps for consultation of flood risk and landslide areas throughout the region.



<https://ambiente.regione.emilia-romagna.it/it/suolo-bacino/sezioni/piano-di-gestione-del-rischio-alluvioni/mappe-pgra-secondo-ciclo>

Numerous research initiatives are currently underway by Universities, research centers such as ARPAE Emilia-Romagna, and collaborative projects. Notable examples include:

"Resilient Water" project - collaboration between ARPAE, University of Bologna, and Gruppo Hera for water resource security and climate change adaptation <https://www.arpae.it/it/notizie/acqua-presentato-il-progetto-resilient-water>

Forestry activities could negatively impact the environment in terms of soil compaction and morphology alteration. This could reduce soil porosity, limiting gas exchange and water infiltration. Compaction can also produce soil impermeabilization, which could cause erosion phenomena. The Regional Forest Regulation no. 3/2018 includes specific provisions to

	minimize these impacts: Art. 21 - Logging operations: Activities must be carried out in the most suitable seasonal periods to avoid soil damage. Temporary logging tracks can only be used during the validity period of authorization/communication. Ground leveling and restoration of natural water flow paths must be ensured. Restoration requirements: When mechanical equipment compromises the condition of permanent roads, those responsible for forestry operations are obliged to restore them to good condition. The Forest Authority may request a money deposit to guarantee restoration costs.
Risk Rating	Specified Risk

Italy Lombardy	Indicator
2.2.5	Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.
Supply Base Verifiers	Regional forestry Regulation: https://normelombardia.consiglio.regione.lombardia.it/NormeLombardia/Accesibile/main.aspx?exp_coll=rr002007072000005&view=showdoc&iddoc=rr002007072000005&selnode=rr002007072000005 Regional map of erosion and Hydrological instability: https://inspire-geoportal.ec.europa.eu/srv/api/records/r_lombar:d8fb8964-501b-4113-86b3-4671fdc06929
Risk Rating justification	On the slopes forestry operation may cause trouble to water drainage as heavy machinery could cause limited waterproofing or small water retaining in the puddles created in the soil. Regional Forestry Regulation rules about this matter at article 23 and 37, providing preventive measures. Hydrogeological instability of Lombardy is detailed in a layer of the regionale geoportal, as part of Territorial Information (SIT). Quantity of ground water may be affected by forestry operations in some lots, as forestry vehicles may impact on soil and temporarily waterproof it. This applies also to TOF Group 2A (except urban) and 3A. Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Specified Risk

Italy Veneto	Indicator
2.2.5	Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.

Supply Base Verifiers	Regional Forestry Regulation n. 2/2020 https://bur.regione.veneto.it/BurVServices/pubblica/DettaglioRegolamento.aspx?id=413790 Erosion regional map https://www.arpa.veneto.it/temi-ambientali/suolo/conoscenza-dei-suoli/carte-applicative/rischio-di-erosione
Risk Rating justification	On the slopes forestry operation may cause trouble to water drainage as heavy machinery could cause limited waterproofing or small water retaining in the puddles created in the soil. Regional Forestry Regulation has got an entire section (Capo V, Art. 35 to 40) about measures to preserve natural water regulation after timber sourcing in the forests. Veneto regional agency of environment (ARPAV) provides a detailed map of hydrogeological risk. Quantity of ground water may be affected by forestry operations in some lots, as forestry vehicles may impact on soil and temporarily waterproof it. This applies also to TOF Group 2A (except urban) and 3A. Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Specified Risk

Italy Emilia-Romagna	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	European Directive: National Emissions reduction Commitments (NEC) Directive (2016/2284/EU) entered into force on 31 December 2016. Replacing earlier legislation (Directive 2001/81/EC), the 2016 NEC Directive sets 2020 and 2030 emission reduction commitments for five main air pollutants. Further, the Directive requires that the Member States draw up National Air Pollution Control Programmes that should contribute to the successful implementation of air quality plans established under the EU's Air Quality Directive. Italian regulation that endorses the European Directive is: Implementation of Directive (EU) 2016/2284 concerning the reduction of national emissions of certain air pollutants, which amends Directive 2003/35/EC and repeals Directive 2001/81/EC Government Act 11. “Attuazione della direttiva (UE) 2016/2284 concernente la riduzione delle

	emissioni nazionali di determinati inquinanti atmosferici, che modifica la direttiva 2003/35/CE e abroga la direttiva 2001/81/CE Atto del Governo 11”
Risk Rating justification	All countries in European Union endorse the NEC, meaning that emissions from machinery used in forestry and transportation have to respects the set limits of pollutants. Regular inspection for all vehicles are mandatory in Italy (they are called “Revisioni”), resulting in fining plus towing if not done at all or even if not done in due time by law (annually or every 2 or 4 years depending on the cases).
Risk Rating	Low Risk

Italy Lazio	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	National Emissions reduction Commitments (NEC) Directive (2016/2284/EU) entered into force on 31 December 2016. Replacing earlier legislation (Directive 2001/81/EC), the 2016 NEC Directive sets 2020 and 2030 emission reduction commitments for five main air pollutants. Further, the Directive requires that the Member States draw up National Air Pollution Control Programmes that should contribute to the successful implementation of air quality plans established under the EU’s Air Quality Directive. Italian regulation that endorses the European Directive is: Implementation of Directive (EU) 2016/2284 concerning the reduction of national emissions of certain air pollutants, which amends Directive 2003/35/EC and repeals Directive 2001/81/EC Government Act 11. “Attuazione della direttiva (UE) 2016/2284 concernente la riduzione delle emissioni nazionali di determinati inquinanti atmosferici, che modifica la direttiva 2003/35/CE e abroga la direttiva 2001/81/CE Atto del Governo 11”
Risk Rating justification	All countries in European Union endorse the NEC, meaning that emissions from machinery used in forestry and transportation have to respects the set limits of pollutants. Regular inspection for all vehicles are mandatory in Italy (they are called “Revisioni”), resulting in fining plus towing if not done at all or even if not done in due time by law (annually or every 2 or 4 years depending on the cases). This applies also to TOF Group 2A, 3A.
Risk Rating	Low Risk

Italy Apulia	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	National Emissions reduction Commitments (NEC) Directive (2016/2284/EU) entered into force on 31 December 2016. Replacing earlier legislation (Directive 2001/81/EC), the 2016 NEC Directive sets 2020 and 2030 emission reduction commitments for five main air pollutants. Further, the Directive requires that the Member States draw up National Air Pollution Control Programmes that should contribute to the successful implementation of air quality plans established under the EU's Air Quality Directive. Italian regulation that endorses the European Directive is: Implementation of Directive (EU) 2016/2284 concerning the reduction of national emissions of certain air pollutants, which amends Directive 2003/35/EC and repeals Directive 2001/81/EC Government Act 11. "Attuazione della direttiva (UE) 2016/2284 concernente la riduzione delle emissioni nazionali di determinati inquinanti atmosferici, che modifica la direttiva 2003/35/CE e abroga la direttiva 2001/81/CE Atto del Governo 11"
Risk Rating justification	All countries in European Union endorse the NEC, meaning that emissions from machinery used in agriculture and transportation have to respect the set limits of pollutants. Regular inspection for all vehicles are mandatory in Italy (they are called "Revisioni"), resulting in fining plus towing if not done at all or even if not done in due time by law (annually or every 2 or 4 years depending on the cases).
Risk Rating	Low Risk

Italy Tuscany	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	National Emissions reduction Commitments (NEC) Directive (2016/2284/EU) entered into force on 31 December 2016. Replacing earlier legislation (Directive 2001/81/EC), the 2016 NEC Directive sets 2020 and 2030 emission reduction commitments for five main air pollutants. Further, the Directive requires that the Member States draw up National Air Pollution Control Programmes that should contribute to the successful implementation of air quality plans established under the EU's Air Quality Directive. Italian regulation that endorses the European Directive is: Implementation of Directive (EU) 2016/2284 concerning the reduction of national emissions of certain air pollutants, which amends Directive 2003/35/EC and repeals Directive 2001/81/EC Government Act 11. "Attuazione della direttiva (UE) 2016/2284 concernente la riduzione delle emissioni nazionali di determinati inquinanti atmosferici, che modifica la direttiva 2003/35/CE e abroga la direttiva 2001/81/CE Atto del Governo 11".

Risk Rating justification	All countries in European Union endorse the NEC, meaning that emissions from machinery used in agriculture and transportation have to respect the set limits of pollutants. Regular inspection for all vehicles are mandatory in Italy (they are called “Revisioni”), resulting in fining plus towing if not done at all or even if not done in due time by law (annually or every 2 or 4 years depending on the cases). This applies also to TOF Group 2A, 3A.
Risk Rating	Low Risk

Spain 6 regions in East and South Spain	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	European Directive: National Emissions reduction Commitments (NEC) Directive (2016/2284/EU) entered into force on 31 December 2016. Replacing earlier legislation (Directive 2001/81/EC), the 2016 NEC Directive sets 2020 and 2030 emission reduction commitments for five main air pollutants. Further, the Directive requires that the Member States draw up National Air Pollution Control Programmes that should contribute to the successful implementation of air quality plans established under the EU's Air Quality Directive.
Risk Rating justification	All countries in European Union endorse the NEC, meaning that emissions from machinery used in forestry and transportation have to respects the set limits of pollutants. The Spanish regulations and the surveillance procedures are carried out by the Autonomous Communities of Aragon, Catalunya, Castilla-La Mancha, Valencia, Murcia and Andalusia. The Autonomous Communities have their own officers to carry out the control tasks. This means that air emissions of forest machinery also comply with legislation. In Spain, on air quality in general, there are reports from the European Commission and NGOs that too little is being done with regard to air pollution control. There have been law-suites, because plans to reduce Ozon are missing at Autonomous Communities, but these are related to urban areas of main cities. Within the Civil Guard there is also the SEPRONA unit (Nature Protection Service). No reports have been published on relevant environmental damage related to forestry operations and harvesting. Regular inspection for all vehicles are mandatory in Spain (they are called “Revisión técnica vehicular”), annually or every 1, 2 or 4 years depending on the cases. This applies also to TOF Group 3A.
Risk Rating	Low Risk

Italy Veneto	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	National Emissions reduction Commitments (NEC) Directive (2016/2284/EU) entered into force on 31 December 2016. Replacing earlier legislation (Directive 2001/81/EC), the 2016 NEC Directive sets 2020 and 2030 emission reduction commitments for five main air pollutants. Further, the Directive requires that the Member States draw up National Air Pollution Control Programmes that should contribute to the successful implementation of air quality plans established under the EU's Air Quality Directive. Italian regulation that endorses the European Directive is: Implementation of Directive (EU) 2016/2284 concerning the reduction of national emissions of certain air pollutants, which amends Directive 2003/35/EC and repeals Directive 2001/81/EC Government Act 11. “Attuazione della direttiva (UE) 2016/2284 concernente la riduzione delle emissioni nazionali di determinati inquinanti atmosferici, che modifica la direttiva 2003/35/CE e abroga la direttiva 2001/81/CE Atto del Governo 11”
Risk Rating justification	All countries in European Union endorse the NEC, meaning that emissions from machinery used in forestry and transportation have to respects the set limits of pollutants. Regular inspection for all vehicles are mandatory in Italy (they are called “Revisioni”), resulting in fining plus towing if not done at all or even if not done in due time by law (annually or every 2 or 4 years depending on the cases). This applies also to TOF Group 2A, 3A.
Risk Rating	Low Risk

Italy Lombardy	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	National Emissions reduction Commitments (NEC) Directive (2016/2284/EU) entered into force on 31 December 2016. Replacing earlier legislation (Directive 2001/81/EC), the 2016 NEC Directive sets 2020 and 2030 emission reduction commitments for five main air pollutants. Further, the Directive requires that the Member States draw up National Air Pollution Control Programmes that should contribute to the successful implementation of air quality plans established under the EU's Air Quality Directive. Italian regulation that endorses the European Directive is: Implementation of Directive (EU) 2016/2284 concerning the reduction of national emissions of certain air pollutants, which amends Directive 2003/35/EC and repeals

	Directive 2001/81/EC Government Act 11. “Attuazione della direttiva (UE) 2016/2284 concernente la riduzione delle emissioni nazionali di determinati inquinanti atmosferici, che modifica la direttiva 2003/35/CE e abroga la direttiva 2001/81/CE Atto del Governo 11”
Risk Rating justification	All countries in European Union endorse the NEC, meaning that emissions from machinery used in forestry and transportation have to respects the set limits of pollutants. Regular inspection for all vehicles are mandatory in Italy (they are called “Revisioni”), resulting in fining plus towing if not done at all or even if not done in due time by law (annually or every 2 or 4 years depending on the cases). This applies also to TOF Group 2A, 3A.
Risk Rating	Low Risk

Spain 6 regions in East and South Spain	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	INVENTARIO DE DAÑOS FORESTALES (IDF) EN ESPAÑA. Red europea de Seguimiento de Daños en los Bosques (Red de Nivel I). RESULTADOS DEL MUESTREO DE 2018. https://www.mapa.gob.es/eu/desarrollo-rural/temas/politicaforestal/inventariodedanosforestales2017_tcm35-441605.pdf Existing legal framework. Laws, regulations and control bodies Regional Manuals of good practices in sustainable forest management Field visits Contract with suppliers
Risk Rating justification	Spain has a clear and effective legal framework and competent authorities that carry out the control tasks. The Spanish regulations and the surveillance procedures carried out by the Autonomous Communities are consistent. The Autonomous Communities have their own personnel to carry out inspections and law enforcement. Royal Decree 1644/2008, of 10 October, establishing the rules for the marketing and commissioning of machinery. Amended by Royal Decree 494/2012 of 9 March to include the risks of pesticide application. Within the Civil Guard there is also the SEPRONA unit (Nature Protection Service). No reports have been published on relevant environmental damage caused by using chemicals linked to forestry operations. Spain has a clear and effective legal framework and competent authorities that carry out the control tasks. The Spanish regulations and the surveillance procedures carried out by the Autonomous Communities are consistent. The Autonomous Communities have their own personnel to carry out inspections and law enforcement. Royal Decree 1644/2008, of 10 October, establishing the rules for the

	marketing and commissioning of machinery. Amended by Royal Decree 494/2012 of 9 March to include the risks of pesticide application Within the Civil Guard there is also the SEPRONA unit (Nature Protection Service). No reports have been published on relevant environmental damage caused by using chemicals linked to forestry operations. To be able to apply biocides and chemical agents it is necessary to have a licence issued by a body recognised by the competent authority and to have completed training in this field. To be able to apply biocides and chemical agents it is necessary to have a licence issued by a body recognised by the competent authority and to have completed training in this field. Spain was the largest consumer of pesticides in Europe. In pine can prosper a problematic moth (pine processionary moth, <i>Thaumetopoea pityocampa</i>). An article of Forest Monitor (2017) describes the issue in Spain and alternative measures to pesticides use. To fight the processionary moth diversification of tree species should be pursued. A study was conducted in Andalusia (Forest-monitor) the area between €1.0 and €1.5 million are spent annually on aerial spraying to control processionary outbreaks in our study region (87.300 km²) In addition, because aerial spraying is conducted in the winter following strong, heavy or massive defoliation, treatments are unlikely to limit growth losses or prevent further damage to trees by other organisms. Insecticide spraying cannot be considered a prevention for outbreaks if it is applied once the outbreak explodes. Spraying is sometimes done in pine forests located close to or within populated areas. Aerial spraying is however ineffective, but pheromone traps, hand removal, or application of high insecticide concentrations using truck or back-pack methods is justified given the risks of PPM larvae for human health (EPPO/CABI, 1997). Forest managers should shift from static to adaptive planning based on scientific evidence, monitoring systems and protocols. The Royal Decree 1311/2012, of 14 September, is to establish the framework sustainable use of pesticides by reducing of the risks and effects of their use on human health and the environment. The Royal Decree is an answer to Directive 2009/128 / EC of the European Parliament, of October 21, 2009, which establishes a framework to achieve a sustainable use of pesticides. With this Directive, the European Union regulates the use of plant protection products. Royal Decree provides for protection of the environment and the drinking water, reducing risks in specific areas (habitats and aquatic species), and measures PPP use in areas outside of agriculture. Royal Decree establishes a ban on aerial spraying in general, allowing them, in special cases only, if authorized by territorial delegations. When Duferco buys timber from suppliers, under contract it obliges the supplier to apply good environmental practices. This applies also to TOF Group 3A.
Risk Rating	Low Risk

Italy Tuscany	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	-Regional Forestry Law no. 39/2000 https://raccoltanormativa.consiglio.regione.toscana.it/articolo?urndoc=urn:nir:regione.toscana:legge:2000-03-21;39 National Law about IPM: https://www.mase.gov.it/portale/documents/d/guest/dlgs_14_08_2012_150-pdf National Plan of integrated Management ("PAN"): https://www.reterurale.it/pan_fitosanitari
Risk Rating justification	According to the Regional law, pesticides are usually not allowed in the forests; in extraordinary conditions prevention and fight against pests are regulated by article 49 of the Tuscany Forestry Regulation. According to the Regional law, pesticides are usually not allowed in the forests; in extraordinary conditions prevention and fight against pests are regulated by article 49 of the Tuscany Forestry Regulation. About forestry plantation such as poplar stands, the existing law enforcement allows the use of the active substances that are admissible for "poplar" or other forest species and only for the adversities indicated by the competent bodies (Linee_di_indirizzo_pioppicoltura_sostenibile.pdf by leaconsorzio.it). The Regional Phytosanitary Service as well the Pests Observatories could authorize actions against extraordinary pests. In any case, all the actions related to prevention and/or protection must be detailed in specific registers filled in by the farmer and they are regulated by national and regional laws. In case of pathogens attack, it is mandatory to promptly communicate the entity and the characteristics of the attack itself. All the forestry activities related to phytosanitary needs have to be declared and authorized by the competent bodies as regulated by the National and Regional Law. The use of pesticides, especially the chemical ones, is forbidden in wood surfaces and in extraordinary cases it is strictly regulated by the Phytosanitary Regional Body. This does not apply to TOF Group 2A, but it applies to agricultural TOF (Group 3A). Italian legislation on integrated pest management refers to Legislative Decree No. 150/2012, which implemented European Directive 2009/128/EC; also the National Action Plan (PAN) for the sustainable use of plant protection products apply in the matter. These legal rules establish that agricultural practices that reduce the use of pesticides to a minimum are mandatory. Techniques such as pest monitoring, use of biological-based products, appropriate agronomic practices, and the use of lower-risk pesticides must be endorsed by professional farmers and records must be kept for each spreading within the year in a proper register.
Risk Rating	Low Risk

Italy Apulia	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	National Plan of eradication of Xylella, Ministry Decree September 26 th 2014: Decreto Ministeriale 26 settembre 2014 “Misure di emergenza per la previsione, il controllo e l'eradicazione di Xylella fastidiosa”, revision published in 2018, chapter 4 regarding containing measures: “Misure fitosanitarie da attuare per il contenimento della diffusione di Xylella fastidiosa subspécie pauca ceppo CoDiRO”
Risk Rating justification	All active ingredients listed in table 1 of the Ministry Decree against Xylella vectors are allowed to be used in Italy; only dimethoate was banned in Europe in 2020 and also in Italy in 2020, and withdrawn from the market.
Risk Rating	Low Risk

Italy Lazio	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	National Law Decree n.214/2005 https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:decreto.legislativo:2005-08-19;214 Regional Forestry Law: https://www.consiglio.regione.lazio.it/consiglioregionale/?vw=leggiregionalidettaglio&id=8715&sv=vigente Regional Forestry Regulation: https://www.regione.lazio.it/regolamenti-regionali-testo-originale/regolamentoregionale-18-aprile-2005-n-7 National Law about IPM: https://www.mase.gov.it/portale/documents/d/guest/dlgs_14_08_2012_150-pdf National Plan of integrated Management (“PAN”): https://www.reterurale.it/pan_fitosanitari
Risk Rating justification	Pesticides are allowed in the forests in extraordinary cases according to national Law Decree n.214/2005. Fight against pests are regulated by article 73 and following of the Regional Forestry Law as well as by art. 97 and following of the Lazio Forestry Regulation. In case of pests’ attack, the owners must immediately notify the competent body. The Regional Phytosanitary Service as well the Pests Observatories could authorize actions against extraordinary pests. In case of pathogens attack, it is mandatory to promptly communicate the

	entity and the characteristics of the attack itself. All the forestry activities related to phytosanitary needs have to be declared and authorized by the competent bodies as regulated by the National and Regional Law. The use of pesticides, especially the chemical ones, is strictly regulated by the Phytosanitary Regional Body. This does not apply to TOF Group 2A, but it applies to agricultural TOF (Group 3A). Italian legislation on integrated pest management refers to Legislative Decree No. 150/2012, which implemented European Directive 2009/128/EC; also the National Action Plan (PAN) for the sustainable use of plant protection products apply in the matter. These legal rules establish that agricultural practices that reduce the use of pesticides to a minimum are mandatory. Techniques such as pest monitoring, use of biological-based products, appropriate agronomic practices, and the use of lower-risk pesticides must be endorsed by professional farmers and records must be kept for each spreading within the year in a proper register.
Risk Rating	Low Risk

Italy Emilia-Romagna	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	According to the Regional law, pesticides are usually not allowed in the forests. About forestry plantation such as poplar stands, the existing law enforcement allows the use of the active substances that are admissible for "poplar" or other forest species and only for the adversities indicated by the competent bodies - Linee_di_indirizzo_pioppicoltura_sostenibile.pdf (leaconsorzio.it) . The Regional Phytosanitary Service as well the Pests Observatories could authorize actions against extraordinary pests. In any case, all the actions related to prevention and/or protection must be detailed in specific registers filled in by the farmer and they are regulated by national and regional laws.
Risk Rating justification	In case of pathogens attack, it is mandatory to promptly communicate the entity and the characteristics of the attack itself. All the forestry activities related to phytosanitary needs have to be declared and authorized by the competent bodies as regulated by the National and Regional Law. The use of pesticides, especially the chemical ones, is forbidden in wood surfaces and in any case strictly regulated by the Phytosanitary Regional Body.

Risk Rating	Low Risk
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Italy Lombardy	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	National Law about IPM: https://www.mase.gov.it/portale/documents/d/guest/dlgs_14_08_2012_150-pdf National Plan of integrated Management ("PAN"): https://www.reterurale.it/pan_fitosanitari Regional Council Resolution No. XI/5836/2021 https://www.fitosanitario.regione.lombardia.it/wps/portal/site/sfr/normativa-di-riferimento/normativa-regionale
Risk Rating justification	The use of pesticides, when allowed, is regulated both by national and regional laws. The National Plan of sustainable use of phytosanitary products rules about any use in any case, that has to be justified and recorded, pending supervision to check the opportunity and proper quantity. In Lombardy, the sustainable use of plant protection products is regulated by the implementing guidelines of the National Action Plan (NAP), updated with Regional Council Resolution No. XI/5836 of December 29, 2021. Pesticides are usually not allowed in the forests; in extraordinary conditions declared by the regional authority, prevention and fight against pests are regulated by Regional Forestry Regulation, that establishes that an extraordinary authorization may be granted, under local forest office supervision.
Risk Rating	Low Risk

Italy Veneto	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	UE Directive 2009/128/CE https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:309:0071:0086:it:PDF National Law about IPM: https://www.mase.gov.it/portale/documents/d/guest/dlgs_14_08_2012_150-

	pdf National Plan of sustainable use of phytosanitary products (Decree of Ministry of Environment, date 22 January 2014): https://www.mase.gov.it/sites/default/files/archivio/normativa/dim_22_01_2014.pdf Regional Forestry Regulation n. 2/2020 https://bur.regione.veneto.it/BurvServices/pubblica/DettaglioRegolamento.aspx?id=413790 Production regulation about poplars ("Ecopioppo"): https://www.leaconsorzio.it/doc/Linee_di_indirizzo_pioppicoltura_sostenibile.pdf
Risk Rating justification	The use of pesticides, when allowed, is regulated both by national and regional laws. The National Plan of sustainable use of phytosanitary products rules about any use in any case, that has to be justified and recorded, pending supervision to check the opportunity and proper quantity. According to the Regional law, pesticides are usually not allowed in the forests; in extraordinary conditions declared by the regional authority, prevention and fight against pests are regulated by Regional Forestry Regulation, that establishes that an extraordinary authorization may be granted (Art. 27), under local forest office supervision. In poplar plantations, the use is restricted to those products that are enlisted in the label for poplars or plantations, and each treatment must be recorded in the field registry ("Registro di campagna"), that is mandatory and subject to inspection by local authorities. Method of use and safety cautions are mandatory by the National Plan of sustainable use of phytosanitary products. Besides, if a pesticide is not allowed for poplar plantations can't be sold to the farmer by law (the vendor licence could be suspended). All local experts interviewed agree about the fact that the use of pesticides in poplar plantations is minimum, even below the suggested Integrated Management Plan developed by the national Institute CREA-PLF named "Ecopioppo", also due to economic reasons. Besides, big poplar farmers have developed non-chemicals method of control of pests, such as use of resistant clones and wider distances between rows of plants. This is ordinary in the PEFC and FSC certified plantations, but it is also common in non-certified plantations, also because all Regions give grants to plant at least 20% of resistant clones in plantations, since 2007. The Regional Phytosanitary Service supervises operations and carry further inspections in the farms/forestry sites to check the proper use of chemicals, if any; this means there are two levels of control. Banned pesticides are illegal and their use is subject not only to fines, but it is also a criminal offence in all Italy, as it is considered as environmental damage.

	This does not apply to TOF Group 2A, but it applies to agricultural TOF (Group 3A). Italian legislation on integrated pest management refers to Legislative Decree No. 150/2012, which implemented European Directive 2009/128/EC; also the National Action Plan (PAN) for the sustainable use of plant protection products apply in the matter. These legal rules establish that agricultural practices that reduce the use of pesticides to a minimum are mandatory. Techniques such as pest monitoring, use of biological-based products, appropriate agronomic practices, and the use of lower-risk pesticides must be endorsed by professional farmers and records must be kept for each spreading within the year in a proper register.
Risk Rating	Low Risk

Italy Emilia-Romagna	Indicator
2.2.8	Waste shall be disposed of in an environmentally appropriate manner.
Supply Base Verifiers	National Law decree n. 152/2006, section 4, about waste disposal.
Risk Rating justification	Law enforcement is very strict in all Italy about this matter and it has been since 2006. Local authorities and private people through social media and complaints to the the public adomistration survey sites when forestry works are performed. Fines can be issued to forestry workers and they are very expensive and they are a strong deterrent to carelessness in this matter. Waste in the forestry works may be: - urban waste (packaging, paper) - hazardous waste (oil, gasoline). The waste management system of Duferco and its suppliers is as follows: -Urban waste: areas must be kept clean and free from residue of rubbish scattered in the floor. Urban waste must be collected and deposited in the nearest municipal container; -Hazardous waste. Proper management of hazardous waste begins at the moment the waste is generated, and all personnel are involved; -Do not mix hazardous waste. -Dispose of hazardous waste through an authorised waste management company. Duferco and its suppliers also have a system implemented with rules of Good Environmental Practices in order to minimise possible impacts. When Duferco buys chips from other suppliers, under contract it demands the supplier to follow the rules of Good Environmental Practices.
Risk Rating	Low Risk

Italy Lazio	Indicator
2.2.8	Waste shall be disposed of in an environmentally appropriate manner.
Supply Base Verifiers	National Law decree n. 152/2006, section 4, about waste disposal.
Risk Rating justification	Law enforcement is very strict in all Italy about this matter and it has been since 2006. Local authorities and private people through social media and complaints to the the public adomistration survey sites when forestry works are performed. Fines can be issued to forestry workers and they are very expensive and they are a strong deterrent to carelessness in this matter. Waste in the forestry works may be: - urban waste (packaging, paper) - hazardous waste (oil, gasoline). The waste management system of Duferco and its suppliers is as follows: -Urban waste: areas must be kept clean and free from residue of rubbish scattered in the floor. Urban waste must be collected and deposited in the nearest municipal container; -Hazardous waste. Proper management of hazardous waste begins at the moment the waste is generated, and all personnel are involved; hazardous waste is never mixed with other waste; it is disposed through an authorised waste management company. Duferco and its suppliers also have a system implemented with rules of Good Environmental Practices in order to minimise possible impacts. When Duferco buys chips from other suppliers, under contract it demands the supplier to follow the rules of Good Environmental Practices. This applies to all Groups (1A, 2A, 3A).
Risk Rating	Low Risk

Italy Apulia	Indicator
2.2.8	Waste shall be disposed of in an environmentally appropriate manner.
Supply Base Verifiers	Law decree n. 152/2006, section 4, about waste disposal.
Risk Rating justification	Law enforcement is very strict and it has been since 2006. Local authorities and private people through social media and complaints to the the public adomistration survey sites when forestry/agricultural works are performed. Fines can be issued to companies performing field works and they are very expensive, representing a strong deterrent to carelessness in this matter. Waste in the field works may be: - urban waste (packaging, paper) - hazardous waste (oil, gasoline). The waste management system of Duferco and its suppliers is as follows:

	-Urban waste: areas must be kept clean and free from residue of rubbish scattered in the floor. Urban waste must be collected daily and deposited in the nearest municipal container; -Hazardous waste. Proper management of hazardous waste begins at the moment the waste is generated, as corrective measure are in place (for instance the sand bag to spread over the oil leakage); hazardous waste is then disposed through an authorised waste management company. Duferco and its suppliers also have a system implemented with rules of Good Environmental Practices in order to minimise possible impacts. When Duferco buys chips from other suppliers, under contract it demands the supplier to follow the rules of Good Environmental Practices.
Risk Rating	Low Risk

Italy Tuscany	Indicator
2.2.8	Waste shall be disposed of in an environmentally appropriate manner.
Supply Base Verifiers	Law decree n. 152/2006, section 4, about waste disposal
Risk Rating justification	Law enforcement is very strict in all Italy about this matter and it has been since 2006. Local authorities and private people through social media and complaints to the the public administration survey sites when forestry works are performed. Fines can be issued to forestry workers and they are very expensive and they are a strong deterrent to carelessness in this matter. Waste in the forestry works may be: - urban waste (packaging, paper) - hazardous waste (oil, gasoline). The waste management system of Duferco and its suppliers is as follows: -Urban waste: areas must be kept clean and free from residue of rubbish scattered in the floor. Urban waste must be collected and deposited in the nearest municipal container; -Hazardous waste. Proper management of hazardous waste begins at the moment the waste is generated, and all personnel are involved; hazardous waste is never mixed with other waste; it is disposed through an authorised waste management company. Duferco and its suppliers also have a system implemented with rules of Good Environmental Practices in order to minimise possible impacts. When Duferco buys chips from other suppliers, under contract it demands the supplier to follow the rules of Good Environmental Practices. This applies to all Groups (1A, 2A, 3A).
Risk Rating	Low Risk

Spain	Indicator
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6 regions in East and South Spain	
2.2.8	Waste shall be disposed of in an environmentally appropriate manner.
Supply Base Verifiers	National Law 22/2011 on “Contaminated soil by waste”. Regional Manuals of good practices in sustainable forest management Visit reports Contracts with suppliers
Risk Rating justification	In Spain there are laws in force that forbid any waste disposal in the forest, such as Law 22/2011 on “The contaminated soil by waste”. The Nature Protection Service (Spanish: Servicio de Protección de la Naturaleza, SEPRONA) is a unit of the Spanish Civil Guard responsible for nature conservation and management of the hunting and fishing industry. Among other things, they are also heavily involved in protection of natural spaces, and prevention and extinction of fires. In relation to this they carry out the survey how the waste management is carried out by the responsible for harvesting. The waste management system of Duferco and its suppliers is as follows: -Urban waste: areas must be kept clean and free from residue of rubbish scattered in the floor. Urban waste must be collected and deposited in the nearest municipal container; -Hazardous waste. Proper management of hazardous waste begins at the moment the waste is generated, and all personnel are involved; -Do not mix hazardous waste. -Dispose of hazardous waste through an authorised waste management company. Duferco and its suppliers also have a system implemented with the following elements in order to minimise the possible impacts of the works: -Manual of good environmental practices, recommended conduct for its own workers and workers from subcontracted companies -Manual of operating practices of the occupational risk prevention system -Code of good environmental practices in Sustainable Forest Management. When Duferco buys chips from other suppliers, under contract it demands the supplier to follow the Manual of Good Environmental. In the inspections held by the public administrations at the end of the operations, they check that there are no wastes in the area. Forestal experts always make a final visit to the area of action to verify that there is no waste or damage in the area. This applies to all Groups (1A, 3A).
Risk Rating	Low Risk

Italy Veneto	Indicator
2.2.8	Waste shall be disposed of in an environmentally appropriate manner.
Supply Base Verifiers	National Law decree n. 152/2006, section 4, about waste disposal.

Risk Rating justification	Law enforcement is very strict in all Italy about this matter and it has been since 2006. Local authorities and private people through social media and complaints to the the public adomistration survey sites when forestry works are performed. Fines can be issued to forestry workers and they are very expensive and they are a strong deterrent to carelessness in this matter. Waste in the forestry works may be: - urban waste (plastic, paper) - hazardous waste (oil, gasoline). The waste management system of Duferco according to national ruling: -Urban waste: collected and deposited in the nearest municipal container; -Hazardous waste: disposed through an authorized waste management company. Duferco and its suppliers also have a system implemented with rules of Good Environmental Practices in order to minimise possible impacts. When Duferco buys chips from other suppliers, under contract it demands the supplier to follow the rules of Good Environmental Practic
Risk Rating	Low Risk

Italy Lombardy	Indicator
2.2.8	Waste shall be disposed of in an environmentally appropriate manner.
Supply Base Verifiers	National Law decree n. 152/2006, section 4, about waste disposal. Regional program for waste management https://www.regione.lombardia.it/wps/portal/istituzionale/HP/DettaglioRedazionale/istituzione/direzioni-generalidi/direzione-generale-ambiente-e-clima/piano-regionale-rifiuti-e-bonifiche/piano-regionale-rifiuti-e-bonifiche
Risk Rating justification	Law enforcement is very strict in all Italy about this matter and it has been since 2006. Local authorities and private people, through social media and complaints to the public administration, survey sites when forestry works are performed. In Lombardy there is also a Regional program for waste management. In Lombardy there are officers called “Ispettori Ambientali” (Environmental Inspectors) who carry out inspection and give fines to infringers. They may be employees of public bodies, such as municipalities or provinces, or of companies responsible for managing environmental services. Fines can be issued to forestry workers and, as they are very expensive, they are a strong deterrent to carelessness in this matter. Besides, if professional workers are caught red-handed, they even may be arrested. Waste in the forestry works may be: - urban waste (packaging, paper); - hazardous waste (oil, gasoline). The waste management system of Duferco Biomasse and its suppliers

	follows rules of collection of urban waste, that is deposited in the municipal containers, while hazardous waste is disposed through an authorized waste management company.
Risk Rating	Low Risk

Spain 6 regions in East and South Spain	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	Felling licenses/Management Plans data, stocks and growth data National or regional inventories, stocks and growth data (“anuarios”) The following Ministries are involved in legislation of Forestry in Spain: Ministerio de Agricultura, Pesca y Alimentación: https://www.mapa.gob.es/en/ Ministerio para la Transición Ecológica: https://www.miteco.gob.es/es/ Forestry statistics: https://www.mapa.gob.es/es/desarrollo-rural/estadisticas/ IFN3: https://www.miteco.gob.es Castilla-la Mancha Natural environment: http://www.castillalamancha.es/tema/medioambiente/ medio-natural Forest: http://www.castillalamancha.es/tema/medioambiente/ Catalunya Forest Service an ecosystems: http://agricultura.gencat.cat/ca/ambits/medinatural/ Aragon Natural environment: http://www.aragon.es/Temas/MedioAmbiente/AreasTematicas/1_Medionatura I Forest: http://www.aragon.es/Temas/MedioAmbiente/AreasTematicas/2_Gestionforestal Andalusia Andalusia Forest Service: http://www.juntadeandalucia.es/ http://www.juntadeandalucia.es/medioambiente/site/portalweb Natural environment: http://www.juntadeandalucia.es/medioambiente/site/portalweb/menuitem.d1a35641276b2bf2490a9d105510e1ca/nextoid=fa99193566a68210VgnVCM10000055011eacRC RD The Andalusian measurements for the prevention and extinction of forest fires: http://www.juntadeandalucia.es/justicia/portal/adriano/.content/recursosexternos/formacion_juecesIIIpresencioninfoca.pdf Region of Murcia: Natural Environment http://www.murcianatural.carm.es/web/guest Forest: http://www.murcianatural.carm.es/web/guest/ambito-forestal Valencia: Natural Environment: http://www.agroambient.gva.es/es/web/medio-natural

	Forest: http://www.agroambient.gva.es/es/web/medio-natural/gestionforestal Spanish Society of Forest Sciences: http://secforestales.org Montero, G. and SERRADA, R. 2013. La situación de los Bosques y el sector en España - ISFE 2013 Sociedad Española de Ciencias Forestales. Lourizán (Pontevedra). http://secforestales.org/content/informe-isfe 7th Spanish Forestry Congress. The situation of forests and the forestry sector in Spain. ISFE 2017: https://7cfe.congresoforestal.es/content/lasituacionde-los-bosques-y-el-sector-forestal-en-espana-isfe-2017 ORDER of December 29, 2011, which regulates the use of forest biomass for energy use: https://www.juntadeandalucia.es/boja/2012/12/3
Risk Rating justification	The Forestry Act (Law 21/2015 of 20 July amending Act 43/2003 of 21 November on Forestry) is the legal basis for forest management. Most Autonomous Communities have their own forestry legislation that regulates the protection, management and use of forests in their territory. Article 33 of the Forestry Act establishes the need for public utility forests and protection forests to have a Forest Management Plan, a work plan or an equivalent management tool. These documents shall be developed by the owner/holder and must always be approved by the regional forest organization. Where an approved management plan is effective, it shall establish the specific laws and regulations to be taken into account in the In general, in the case of non-protection private forests and public forests that are not catalogued, it is not compulsory to develop a management plan. The competent body of the autonomous community will regulate in which cases it is mandatory to have a forest management tool. The different laws in each Autonomous Community regulate forest operations, use and specific technical limitations (type of logging, maximum allowable cutting area, machinery to be used according to the soil conditions, etc.), diameters (minimum and/or maximum), species and other parameters. The available forestry statistics of national forestry inventory (IFN3) show a significant increase in timber stocks in Spain from inventory to inventory as a result of both the continued increase in forest area in recent decades and the improvement in forest cover. Also, according to the reports produced by the Ministry's Forestry Service, the annual growth of wood in Spanish forests (45 million m3) is about three times greater than the amount harvested (15 million m3 per year). This balance, with an extraction rate of 35%, is maintained with the current data. However, the figures vary widely between Autonomous Communities and range from 10% to 88%. In all cases, the felling figures are lower than the growth figures. The levels of harvesting are always well justified. In eucalyptus groves the entire cover is harvested at the end of the shift, while in pine groves, intermediate work and harvesting is carried out, although in all cases the harvesting levels are conservative, as confirmed by the statistics and reports. Duferco and its suppliers perform only maintenance operations approved by

	the state authorities. Most of the forests within the supply base are in high need of maintenance operations. The operations that are being carried out focus on forest stand improvement. In no case clear cuts are made. Selective cuttings and maintenance operations secure the continuity of the forest, improve the quality of the stand, and enable natural forest regeneration. As a result, the net increment of wood within the forest increases. This does not apply to TOF Group 3A.
Risk Rating	Low Risk

Italy Tuscany	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	In Tuscany the forestry surface has grown progressively in the last decades in every single municipality (see Figure below). Nowdays it covers over 50% of the whole regional surface. (Piras, F.; Venturi, M.; Corrieri, F.; Santoro, A.; Agnoletti, M. Forest Surface Changes and Cultural Values: The Forests of Tuscany (Italy) in the Last Century. Forests 2021, 12, 531. https://doi.org/10.3390/f12050531) FOREST AREA Divided between broadleaved and coniferous in 1936 and 2016 <table border="1"><thead><tr><th>Municipality</th><th>1936 Broadleaved</th><th>1936 Coniferous</th><th>2016 Broadleaved</th><th>2016 Coniferous</th></tr></thead><tbody><tr><td>Livorno</td><td>55,000</td><td>10,000</td><td>75,000</td><td>15,000</td></tr><tr><td>Versilia e città spezzina</td><td>20,000</td><td>5,000</td><td>25,000</td><td>10,000</td></tr><tr><td>Garfagnana e Val di Lima</td><td>55,000</td><td>10,000</td><td>65,000</td><td>15,000</td></tr><tr><td>Lucche sia</td><td>25,000</td><td>5,000</td><td>30,000</td><td>10,000</td></tr><tr><td>Val di Nievole e Val d'Arno inferiore</td><td>15,000</td><td>5,000</td><td>20,000</td><td>10,000</td></tr><tr><td>Firenze-Pistoia-Provincia</td><td>65,000</td><td>10,000</td><td>75,000</td><td>15,000</td></tr><tr><td>Mugello</td><td>80,000</td><td>10,000</td><td>90,000</td><td>15,000</td></tr><tr><td>Pistoia Livorno Pistoia Provincia</td><td>40,000</td><td>10,000</td><td>50,000</td><td>15,000</td></tr><tr><td>Val d'Elsa</td><td>25,000</td><td>5,000</td><td>30,000</td><td>10,000</td></tr><tr><td>Chianti</td><td>30,000</td><td>5,000</td><td>35,000</td><td>10,000</td></tr><tr><td>Val d'Arno superiore</td><td>35,000</td><td>5,000</td><td>40,000</td><td>10,000</td></tr><tr><td>Carrarese e Val di Lima</td><td>55,000</td><td>10,000</td><td>65,000</td><td>15,000</td></tr><tr><td>Val di Cecina</td><td>50,000</td><td>10,000</td><td>60,000</td><td>15,000</td></tr><tr><td>Colonna di Siena</td><td>45,000</td><td>10,000</td><td>55,000</td><td>15,000</td></tr><tr><td>Pistoia Arezzo e Val di Chiana</td><td>45,000</td><td>10,000</td><td>55,000</td><td>15,000</td></tr></tbody></table>	Municipality	1936 Broadleaved	1936 Coniferous	2016 Broadleaved	2016 Coniferous	Livorno	55,000	10,000	75,000	15,000	Versilia e città spezzina	20,000	5,000	25,000	10,000	Garfagnana e Val di Lima	55,000	10,000	65,000	15,000	Lucche sia	25,000	5,000	30,000	10,000	Val di Nievole e Val d'Arno inferiore	15,000	5,000	20,000	10,000	Firenze-Pistoia-Provincia	65,000	10,000	75,000	15,000	Mugello	80,000	10,000	90,000	15,000	Pistoia Livorno Pistoia Provincia	40,000	10,000	50,000	15,000	Val d'Elsa	25,000	5,000	30,000	10,000	Chianti	30,000	5,000	35,000	10,000	Val d'Arno superiore	35,000	5,000	40,000	10,000	Carrarese e Val di Lima	55,000	10,000	65,000	15,000	Val di Cecina	50,000	10,000	60,000	15,000	Colonna di Siena	45,000	10,000	55,000	15,000	Pistoia Arezzo e Val di Chiana	45,000	10,000	55,000	15,000
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Risk Rating justification	The harvesting activity is regulated by regional and national laws. Law enforcement provides rules about harvesting levels (for instance percentage of cutting, number of plants, etc.) and they are mandatory. Every year the municipal competent bodies declare the maximum forests percentage that can be harvested related to its forestry area. According to that, when the harvesting authorization document is approved by the competent authority, it means that it is suitable and consequently sustainable for the related territory. For each harvesting activity, according to the Regional law, the harvesting level is strictly related to various aspects as pathogens control,																																																																																

	implementation of ecosystem services and economical aspects as well. It is required to maintain forest ecosystem services, to guarantee environment protection and avoid heavy forestry operations. In Tuscany, according to the Regional Forestry Law, the owners could draft a management plan or harvesting plan which must be approved by the specific competent authority. These documents, when approved, are mandatory about harvesting levels. In some cases, over limited areas, a higher harvesting level (over the law limit) may be specified and justified by the authorization process according to specific aims (for instance river banks cuttings related to trees that may fall into the river and create a problem downstream). When buying biomass or timber, Duferco asks for a statement that guarantees the harvesting was conducted following all mandatory rules and there are no complains. About plantations the situation is different, but it is only a very small part of the forest cover. As a result of a national market crisis, the forest plantations, especially the poplar ones, are dwindling. In Tuscany the poplar plantation surface is estimated to cover around 1.350 ha (Linee_di_indirizzo_pioppicoltura_sostenibile.pdf (leaconsorzio.it); according to the National Forests Inventory of 2015 the pure broadleaves ones cover around 1428 ha (Superficie e composizione – Inventario Nazionale delle Foreste e dei serbatoi forestali di Carbonio – INFC (inventarioforestale.org)). In Italy it is estimated that the plantations cover a surface of about 122.250 ha, of which the 70% are constituted by poplar plantations. From a productive point of view poplar plantations are fundamental guarantying the 40% of the Italian long-lived wood products. (631-637-corona.pdf (aisf.it). This does not apply to TOF Group 2A, 3A.
Risk Rating	Low Risk

Italy Apulia	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	Not applicable for TOF that are to be eradicated by law.
Risk Rating justification	Not applicable for TOF that are to be eradicated by law.
Risk Rating	Low Risk

Italy Lazio	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	Third National Forest Inventory INFC 2015

	https://www.inventarioforestale.org/it/statistiche_infc/ Regional Forestry Law: https://www.consiglio.regione.lazio.it/consiglioregionale/?vw=leggieregionalidettaglio&id=8715&sv=vigente Regional Forestry Regulation: https://www.regione.lazio.it/regolamenti-regionali-testo-originale/regolamentoregionale-18-aprile-2005-n-7
Risk Rating justification	According to the Forestry National Inventory forests now cover almost the 37% of the total regional surface and they have progressively grown in the last decades due to the socioeconomic changes occurred after Second World War (Italian Forests. Select results of the third National Forest Inventory INFC 2015). Harvesting activity is regulated by regional and national laws. Law enforcement provides rules about harvesting levels (for instance percentage of cutting, number of plants, etc.) and they are mandatory. When the harvesting authorization document is approved by the competent authority, it means that it is suitable and consequently sustainable for the related territory. Regional Forest Law specify when regeneration is needed in the forests. Felling licences detail regeneration mandatory rules in specific cases. For each harvesting activity, according to the Regional law, the harvesting level is strictly related to various aspects as pathogens control, implementation of ecosystem services and economical aspects as well. It is required to maintain forest ecosystem services, to guarantee environment protection and avoid heavy forestry operations. In Lazio, according to the Regional Forestry Law and the Forestry Regulation, the technicians, appointed by the owners, have to draft a management plan or harvesting project which must be approved by the specific competent authority. These documents, when approved, are mandatory about harvesting levels. In some cases, over limited areas, a higher harvesting level (over the law limit) may be specified and justified by the authorization process according to specific aims (for instance river banks cuttings related to trees that may fall into the river and create a problem downstream or in case of phytosanitary reasons). When buying biomass or timber, Duferco asks for a statement that guarantees the harvesting was conducted following all mandatory rules and there are no complains. This does not apply to TOF Group 2A, 3A.
Risk Rating	Low Risk

Italy Emilia-Romagna	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	Giornata internazionale delle foreste, https://ambiente.regione.emilia-

	romagna.it/it/notizie/attualita/2025/marzo/il-21-marzo-e-la-giornata-internazionale-delle-foreste Regional Forestry Law (L.R. 30/1981) Regional Forest Regulation no. 3/2018
Risk Rating justification	In Emilia-Romagna, the forestry surface has grown progressively in the last decades. Thanks to sustainable forest management tools, the forest area has nearly doubled since the post-war period and now covers approximately 640,000 hectares, over one quarter of the entire regional territory. The harvesting activity is regulated by regional and national laws. Law enforcement provides rules about harvesting levels (for instance percentage of cutting, number of plants, etc.) and they are mandatory. The Regional Forest Regulation no. 3/2018, establishes the framework for sustainable forest management. According to this regulation, when the harvesting authorization document is approved by the competent authority, it means that it is suitable and consequently sustainable for the related territory. For each harvesting activity the harvesting level is strictly related to various aspects such as pathogens control, implementation of ecosystem services and economic aspects as well. It is required to maintain forest ecosystem services, to guarantee environmental protection and avoid heavy forestry operations. In Emilia-Romagna, according to the Regional Forestry Law (L.R. 30/1981) and the Regional Forest Regulation no. 3/2018, forest owners can draft management plans or harvesting plans which must be approved by the specific competent authority and are mandatory about harvesting levels. In some cases, over limited areas, a higher harvesting level (over the law limit) may be specified and justified by the authorization process according to specific aims (for instance river banks cuttings related to trees that may fall into the river and create a problem downstream). When buying biomass or timber, Duferco asks for a statement that guarantees the harvesting was conducted following all mandatory rules and there are no complaints. About plantations, the situation is different, but it is only a very small part of the forest cover. In Emilia-Romagna, wood plantations (mostly poplars) extend over just 6,000 hectares.
Risk Rating	Low Risk

Italy Lombardy	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	Report state of the forests Lombardy 2023: https://www.ersaf.lombardia.it/wp-content/uploads/2025/01/RAPPORTO_STATO_FORESTE_2023.pdf

	Report about forests state and Forestry sector in Italy 2018 (Rapporto sullo stato delle foreste e del settore forestale in Italia): https://www.reterurale.it/flex/cm/pages/ServeBLOB.php/L/IT/IDPagina/19231																							
Risk Rating justification	Quantitative data relating to forest biomass for the Lombardy region refer to the National Inventory of Forests and Forest Carbon Reservoirs conducted by the Carabinieri Forestali (INFC2015). The updated unit yield of the over 600,000 hectares of forest area in Lombardy is estimated at 246.8 m3/ha. This value is obtained starting from the tree volume given by the 2015 INFC (128 million m3), considering the total increase up to 2023, according to the annual average value of 5.9 m3/ha, which amounts to 3,648,578 m3, net of the average woody mass removed from 2015 to date (average data provided by monitoring logging reports amounting to a total of 589,263 m3/year). Considering that the mass required for felling in 2023 amounts to 753,526 m3, equal to 1.2 m3/ha when compared to the total forest area, the comparison between the increase and the unit harvest shows an annual saving in woody mass of 4.7 m3/ha, corresponding to a total of 2,895,052 m3/year for the entire region. The last Report about forests state and Forestry sector in Italy 2018 states that inventory of forests in Italy (and in Lombardy) has developed an important increase in every forest type and only less than 1% of the annual increase was sourced as timber: <table><tr><th rowspan="3"></th><th colspan="4">Boschi alti</th></tr><tr><th colspan="2">Area basimetrica</th><th colspan="2">Volume</th></tr><tr><th>(m²)</th><th>(m²/ha)</th><th>(m³)</th><th>(m³/ha)</th></tr><tr><td>Lombardia</td><td>13.466.526</td><td>23,3</td><td>105.423.629</td><td>182,4</td></tr><tr><td>Italia</td><td>176.724.014</td><td>20,6</td><td>1.256.099.493</td><td>146,4</td></tr></table>		Boschi alti				Area basimetrica		Volume		(m²)	(m²/ha)	(m³)	(m³/ha)	Lombardia	13.466.526	23,3	105.423.629	182,4	Italia	176.724.014	20,6	1.256.099.493	146,4
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Risk Rating	Low Risk																							

Italy Veneto	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	

	Study about state of the forests in Veneto by the Regional Conference of Agriculture and Rural Development: https://piave.regione.veneto.it/resource/resolver?resourceId=bc499348-47eb-43cb-8c1e-a3084ed88520/37.pdf Report about forests state and Forestry sector in Italy 2018 (Rapporto sullo stato delle foreste e del settore forestale in Italia): https://www.reterurale.it/flex/cm/pages/ServeBLOB.php/L/IT/IDPagina/19231
Risk Rating justification	According to the Forestry National Inventory forests now cover almost the 37% of the total regional surface and they have progressively grown in the last decades due to the socioeconomic changes occurred after Second World War (Italian Forests. Select results of the third National Forest Inventory INFC 2015). Harvesting activity is regulated by regional and national laws. Law enforcement provides rules about harvesting levels (for instance percentage of cutting, number of plants, etc.) and they are mandatory. When the harvesting authorization document is approved by the competent authority, it means that it is suitable and consequently sustainable for the related territory. Regional Forest Law specify when regeneration is needed in the forests. Felling licences detail regeneration mandatory rules in specific cases. According to a few studies, forest cover in Veneto has constantly increased in the last decades; a study commissioned by the Regional Conference of Agriculture and Rural Development in 2020 states that in 10 years (from 2005 to 2015) forests in Veneto have increased by 4,2% (and average in Italy is +4,9%). The last Report about forests state and Forestry sector in Italy 2018 states that inventory of forests in Italy (and in Veneto) has developed an important increase in every forest type and only less than 1/5 of the annual increase was sourced as timber.
Risk Rating	Low Risk

Italy Emilia-Romagna	Indicator
2.2.10	Harvested areas shall be regenerated
Supply Base Verifiers	Regional Forest Law L.R. 30/1981 and Regional Forest Regulation no. 3/2018 Venice Agreement 2014 https://argav.org/2014/01/30/litalia-ha-bisogno-di-pioppi-siglato-accordo-fra-le-regioni-della-pianura-padana-per-incentivarne-la-coltivazione/
Risk Rating justification	Regional Forest Law L.R. 30/1981 and Regional Forest Regulation no. 3/2018 specify when regeneration is needed in forests. Felling licenses detail regeneration mandatory rules in specific cases. The

Regional Forest Regulation no. 3/2018 contains specific provisions:

Art. 15 – Rinnovazione anticipata dei boschi per mutarne la composizione specifica (Early forest regeneration to change species composition): This article regulates forest regeneration interventions and establishes that:

- Natural regeneration must be privileged when present
- If natural regeneration does not establish, there is an obligation to proceed artificially with regeneration and subsequent cultivation care
- Authorization is subject to carrying out maintenance work (cultivation care), if necessary, until establishment of the new forest
- The Forestry Authority may require the establishment of a guarantee deposit to cover the costs of artificial regeneration and subsequent cultivation care in case natural regeneration does not occur

Additionally, throughout the Regulation, requirements for regeneration are specified for different types of forest interventions (clear-cutting, thinning, etc.), ensuring forest sustainability.

In case of final cut, the authorization document must specify how the forest will be regenerated. The Regional Forest Regulation n. 3/2018 establishes clear obligations:

Natural regeneration is a priority: when present and widespread, artificial regeneration is not necessarily required (Art. 15, comma 7). However, silvicultural techniques must be used to safeguard the underlying layer of native species, including through the use of cable cranes.

Obligation for artificial regeneration: It is mandatory to provide artificially for regeneration and subsequent cultivation care in case natural regeneration does not establish (Art. 15, comma 9).

Authorization conditions: The authorization is subject to carrying out maintenance work (cultivation care), if necessary, until establishment of the new forest (Art. 15, comma 8).

Financial guarantee: The Forestry Authority may require the establishment of a security deposit to guarantee coverage of expenses for artificial regeneration of the forest and subsequent cultivation care in case natural regeneration does not occur (Art. 15, comma 12). In case of non-compliance, the authority establishes a peremptory deadline for restoration interventions; after this deadline, pursuant to art. 7, comma 6 of D.Lgs. n. 34/2018, the Authority proceeds directly with execution of works, even with temporary occupation and without obligation to pay any compensation. Costs are charged to the person responsible for violations.

Reforestation process is paid by the applicant. Mitigation and compensation measures are listed in the authorization documents. For final cuts, the competent authority may request a specific payment (security deposit or bank guarantee) for forest reconstruction assurance before authorizing the harvesting, to be released after verification of successful regeneration.

For ordinary silvicultural works, compliance with certain mandatory conditions ensures that there are no negative impacts on forest regeneration. These conditions include:

- Execution of operations in suitable seasonal periods
- Preservation of seed trees or standard trees (matricine) according to forest type

	- Protection of existing natural regeneration - Compliance with minimum rotation periods - Proper distribution of logged areas When buying biomass or timber, Duferco asks for a statement that guarantees the harvesting has been conducted following all regulatory prescriptions and there is no non-compliance. For plantations with public financing or subject to management plans (Art. 48, comma 5), authorization or communication is required and may specify a re-cultivation plan in which it must be specified how the plantation might be regenerated. For plantations without public financing and without management plans (Art. 48, comma 6), no authorization or communication is required for harvesting or removal, but the poplar surface in Italy may not decrease but only increase due to the Venice Agreement of 2014.
Risk Rating	Low Risk

Italy Lazio	Indicator
2.2.10	Harvested areas shall be regenerated
Supply Base Verifiers	Regional Forestry Law: https://www.consiglio.regione.lazio.it/consiglioregionale/?vw=leggiregionalidetttaglio&id=8715&sv=vigente Regional Forestry Regulation: https://www.regione.lazio.it/regolamenti-regionali-testo-originale/regolamentoregionale-18-aprile-2005-n-7
Risk Rating justification	As forestry surfaces must be maintained and protected in Italy, it's mandatory to guarantee forest regeneration after harvesting activities. Regional Forest Law and Regulation specify when regeneration is needed in forests. Felling licences detail regeneration mandatory rules in specific cases. In forest plantations a harvesting authorization is required and may specify a re-cultivation plan in which it has to be specified how the plantation might be regenerated. Compensatory reforestation, as specified in the Regional Regulation – art. 14, is mandatory in case of surfaces above 5000 square metres and the owner is always in charge of the payment. Mitigation and compensation measures are enlisted in the authorization documents. For ordinary silvicultural works, compliance with certain mandatory conditions assure that there are no negative impacts on the forest regeneration. When buying biomass or timber, Duferco asks for a statement that guarantees the harvesting has been conducted following all the normative prescriptions as well as there is no noncompliance. This applies also to TOF Group 2A- Landscape. Forest sites and TOF lots are visited to fill in technical evaluations about

	sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Low Risk

Italy Apulia	Indicator
2.2.10	Harvested areas shall be regenerated
Supply Base Verifiers	- Manager of the Phytosanitary Observatory Decree n. 50, date May 17Th 2023, regarding measures to re-plant olive trees within the infected zone, as stated in article 3 of the interministry Decree n. 2484/2020 (descending from national Law n. 44/2019 “Extraordinary Plan for regeneration of olive trees in Apulia”). DDS n. 50 del 17.05.2023 a firma del Dirigente della Sezione Osservatorio Fitosanitario del Dipartimento Agricoltura della Regione Puglia. Misura “Reimpianto olivi zona infetta” di cui all’art. 6 del Decreto Interministeriale n. 2484/2020, di attuazione delle disposizioni di cui all’articolo 8-quater della Legge 21 maggio 2019, n. 44, relativo all’attuazione del “Piano straordinario per la rigenerazione olivicola della Puglia”. - Evaluation of the Xylella fastidiosa emergency within the Apulia Region, final document approved by the Agriculture Commission of the House of the Representative of the Italian Parliament. Indagine conoscitiva sull'emergenza legata alla diffusione della <i>Xylella fastidiosa</i> nella regione Puglia. DOCUMENTO CONCLUSIVO APPROVATO DALLA COMMISSIONE AGRICOLTURA della Camera dei Deputati. https://www.camera.it/leg18/824?tipo=A&anno=2019&mese=02&giorno=21&view=&commissione=13#data.20190221.com13.allegati.all00010 - Extraordinary Plan for olive trees regeneration in Apulia, date March 2020 (Piano straordinario per la rigenerazione olivicola della Puglia) https://www.regione.puglia.it/documents/736605/736613/DI+firmato-PianoXylella+06-03-2020.pdf/5fc2e197-b8de-c55b-9c21-f3c52fe40a14?t=1609006848145
Risk Rating justification	At national and regional level, re-planting of olive trees with resistant varieties is not mandatory by law as eradication follows an extraordinary cause (that's way it can be rated as a specific risk), but grants are only given to applicants who eradicate and re-plant the same or a bigger number of trees, meaning that all professional farmers apply for economic contribution from the Puglia Region. Besides, olive oil demand trend makes it profitable to follow up the crop, as it has been for centuries, so much that Apulian landscape has been shaped upon the olive trees orchard and the local economy is related to the production of olive oil (oil mills, glass industries, etc.).

Risk Rating	Specified Risk
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Italy Tuscany	Indicator
2.2.10	Harvested areas shall be regenerated
Supply Base Verifiers	Regional laws and application of laws: -Regional Forestry Law no. 39/2000 https://raccoltanormativa.consiglio.regione.toscana.it/articolo?urndoc=urn:nir:regione.toscana:legge:2000-03-21;39
Risk Rating justification	Regional Forest Law specifies when regeneration is needed in the forests. Felling licences detail regeneration mandatory rules in specific cases. Art. 54 Regional Forestry Regulation and art. 66 and 67 of the Regional Forestry Law specify rules for plantations. In forest plantations, law enforcement is different because they are not considered as forest but as crops. In any case also for plantations a harvesting authorization is required and may specify a re-cultivation plan in which it has to be specified how the plantation might be regenerated. According to Regional law, replantation of forestry species after a harvesting activity is mandatory in case of surfaces bigger than 2000 square metres. In case of final cut in the authorization document is fundamental to specify in which way the forest will be regenerated. Sometimes a reforestation is not needed because the natural regeneration already exists, that's why there might be felling licence without rules in this matter. As specified in the Regional Law, the forestry surfaces must be maintained and protected so that it's mandatory to guarantee forest regeneration after harvesting activities. Reforestation process is paid by the applicant. Mitigation and compensation measures are enlisted in the authorization documents. Sometimes in case of final cuts the competent authority could request a specific payment for forest reconstruction assurance before authorizing the harvesting. For ordinary silvicultural works, compliance with certain mandatory conditions assure that there are no negative impacts on the forest regeneration. When buying biomass or timber, Duferco asks for a statement that guarantees the harvesting has been conducted following all the normative prescriptions as well as there is no noncompliance. This applies also to TOF Group 2A- Landscape. Forest sites and TOF lots are visited to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Low Risk

Spain 6 regions in East and South Spain	Indicator
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2.2.10	Harvested areas shall be regenerated
Supply Base Verifiers	Forestry Act (Law 21/2015 of 20 July amending Act 43/2003 of 21 November on Forestry) Felling licences
Risk Rating justification	All these requirements are taken into account in the felling licence that is always present. According to the reports produced by the Ministry's Forestry Service consequent to the Fourth Forest National Inventory (IFN4), the annual growth of wood in Spanish forests (45 million m3) is about three times greater than the amount harvested (15 million m3 per year). The amount of felled timber has not been exceeding the net annual increment for decades in all Spain, that means the current wood extraction is assumed not to impede the long-term production capacity of any ordinary forest. Duferco only sources from ordinary forests for producing SBP feedstock. In Spain only thinnings are performed in forests, and natural regeneration is then assured. Eucalyptus stands are either cut and re-grown or are re- planted (as it is mandatory to replant in any Region of Spain, according to laws that forbid land use change to agriculture or other use). This does not apply to TOF Group 3A.
Risk Rating	Low Risk

Italy Veneto	Indicator
2.2.10	Harvested areas shall be regenerated
Supply Base Verifiers	National law: - Law Decree no. 34/2008 ("Testo unico in materie di foreste e filiere forestali") https://www.gazzettaufficiale.it/eli/id/2018/04/20/18G00060/sg Regional Forestry Regulation n. 2/2020 https://bur.regione.veneto.it/BurVServices/pubblica/DettaglioRegolamento.aspx?id=413790
Risk Rating justification	As forestry surfaces must be maintained and protected in Italy, it's mandatory to guarantee forest regeneration after harvesting activities. Regional Forest Law and Regulation specify when regeneration is needed in forests. Felling licences detail regeneration mandatory rules in specific cases. Regional Forestry Regulation n. 2/2020 at article 9 prescribe mandatory rules for each forest type in order to achieve the natural regeneration or either artificial regeneration at art. 28. Natural regeneration has always to be protected in any felling or other operation as stated at art. 13, 18, 19, 25, 31 and 32 of the same Forestry Regulation.

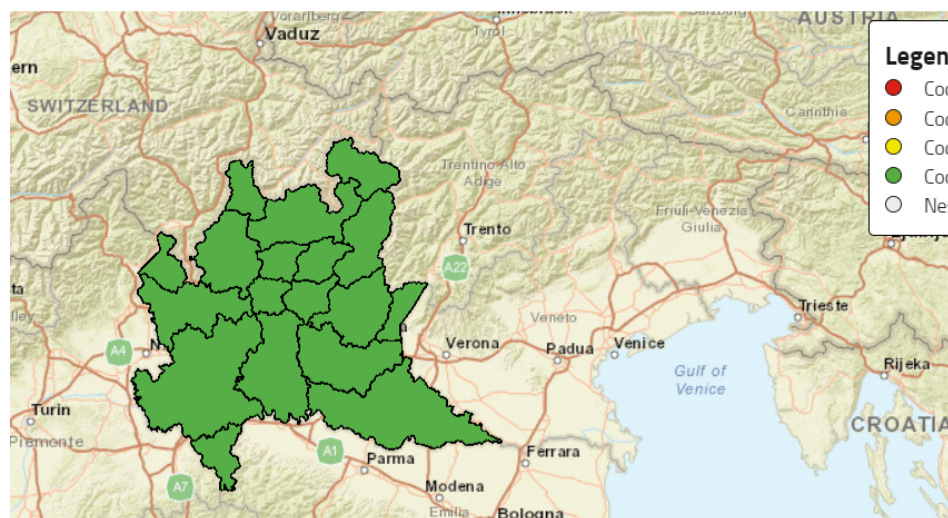
	Clear cut is forbidden in any case, unless for phytosanitary reasons, under project of re-planting or natural regeneration, that is checked on the field by regional authority. Forest operations are supervised in Italy by the national army of Gruppo Carabinieri Forestale that are the rural police in charge of verifications on the field; they may issue very expensive fines in cases of non-conformity in the matter of respect of regeneration and re-planting rules. When buying biomass or timber, Duferco asks for a statement that guarantees the harvesting has been conducted following all the normative prescriptions as well as there is no noncompliance. This applies also to TOF Group 2A- Landscape. Forest sites and TOF lots are visited to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Low Risk

Italy Lombardy	Indicator
2.2.10	Harvested areas shall be regenerated
Supply Base Verifiers	National Law Decree no. 34/2008 (Testo unico in materie di foreste e filiere forestali) https://www.gazzettaufficiale.it/eli/id/2018/04/20/18G00060/sg Regional forestry Regulation: https://normelombardia.consiglio.regione.lombardia.it/NormeLombardia/Accesibile/main.aspx?xp_coll=rr002007072000005&view=showdoc&iddoc=rr002007072000005&selnode=rr002007072000005
Risk Rating justification	Clear cut is forbidden in any case by national and regional laws, unless for phytosanitary reasons, under project of re-planting or natural regeneration, that is checked on the field by local authority. Forest operations are supervised in Italy by the national army of Gruppo Carabinieri Forestale that are the rural police in charge of verifications on the field; they may issue very expensive fines in cases of non-conformity in the matter of respect of regeneration and re-planting rules.
Risk Rating	Low Risk

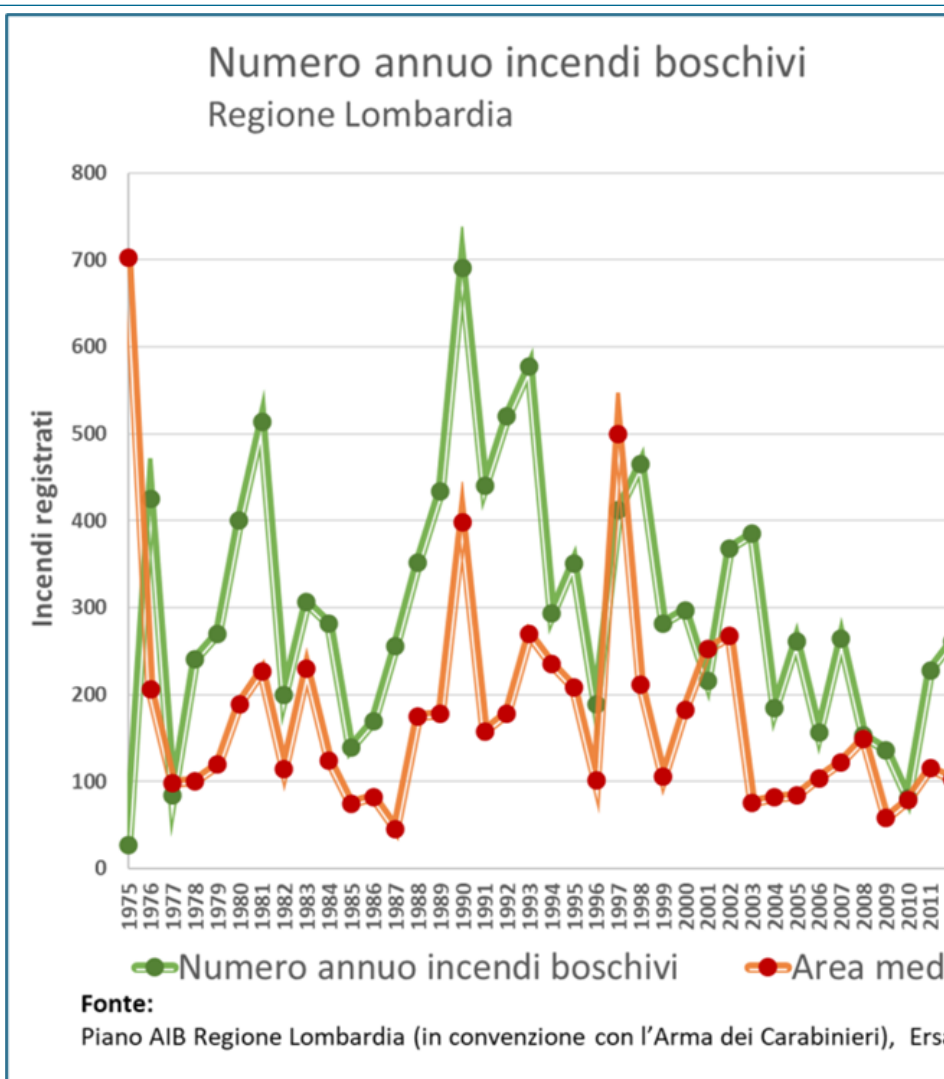
Italy Lombardy	Indicator
2.2.11	The impacts of natural processes such as fires, pests and diseases shall be managed.
Supply Base Verifiers	National law: - Law Decree no. 34/2008 ("Testo unico in materie di foreste e filiere

	forestali") https://www.gazzettaufficiale.it/eli/id/2018/04/20/18G00060/sg Regional forestry Regulation: https://normelombardia.consiglio.regione.lombardia.it/NormeLombardia/Accesibile/main.aspx?exp_coll=rr002007072000005&view=showdoc&iddoc=rr002007072000005&slnode=rr002007072000005 Forest fire online source Lombardy https://www.regione.lombardia.it/wps/portal/istituzionale/HP/DettaglioServizio/servizi-e-informazioni/Enti-e-Operatori/protezione-civile/rischi-naturali/siab-sistema-informativo-antincendio-boschivo/siab-sistema-informativo-antincendio-boschivo Regional Alert system about forest fire risk: https://www.allertalom.regione.lombardia.it/mappa?cdScenario=6&cdTipologiaGestcom=2on ISPRA data https://climadat.isprambiente.it/dati-e-indicatori/indicatori-di-impatto-dei-cambiamenti-climatici/incendi-boschivi-regione-lombardia/
Risk Rating justification	Forest fire prevention and fighting is ruled by the National forest law - Law Decree no. 34/2008 and consequently by the Regional Forestry Regulation no. 5/2007 at Section II. Forest operations are supervised in Italy by the national army of Gruppo Carabinieri Forestale that stand as the rural police in charge of verifications on the field; they may issue fines in cases of non-conformity in the matter of respect of Regional Forestry Regulation application. Lombardy Region is in charge of forest fire prevention as follows: - Regional Civil Protection Units must perform forest fire prevention, and active firefighting as detailed by the Regional Forest Fire Prevention Plan, descending from Regional Law No. 31/2008. It is an integrated intervention model of forecasting, prevention, and active firefighting that let reduce the number of fires and the affected area in Lombardy. There is also a system of forecasting: the Natural Risk Monitoring Functional Center (CFMR), based on the AIB Surveillance Bulletin issued daily by the Regional Meteorological Service of ARPA Lombardia during the "high forest fire risk period" that is from December to May. The CFMR is also in charge of forest fire risk forecasting activities. Prevention activities are also performed, to decrease the risk of fires: forest thinning, high-altitude water supply points, helicopter landing pads, and promotion of fire prevention measures among operators and the general public. Active firefighting activities are implemented in synergy with local authorities, firefighters, AIB volunteers, and the COAU (Unified Air Operations Center). The Region, through the Regional Operations Room, coordinates activities, providing resources and equipment such as bomber helicopters, radio communications networks, and ground equipment.

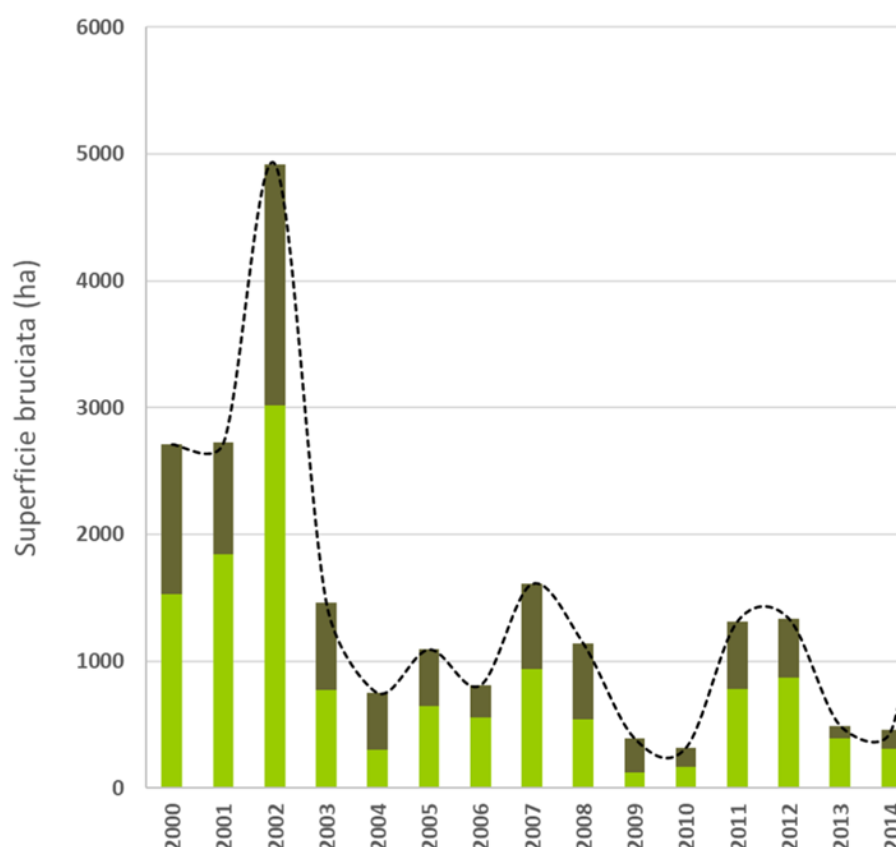
Forest fire risk is mapped daily in the Regional Alert System (“AllertaLOM”), see example below, with severity codes from white (no risk) to red (high risk).



The ISPRA (national institute for environment protection and research) collects data as historical series (1975-2020) of forest fire in Lombardy, through annual values of affected area and number of fires.



Superfici annue percorse dal fuoco divise Regione Lombardia



Fonte:

Piano AIB Regione Lombardia

(in convenzione con l'Arma dei Carabinieri), Ersaf.

■ Superficie non boscata

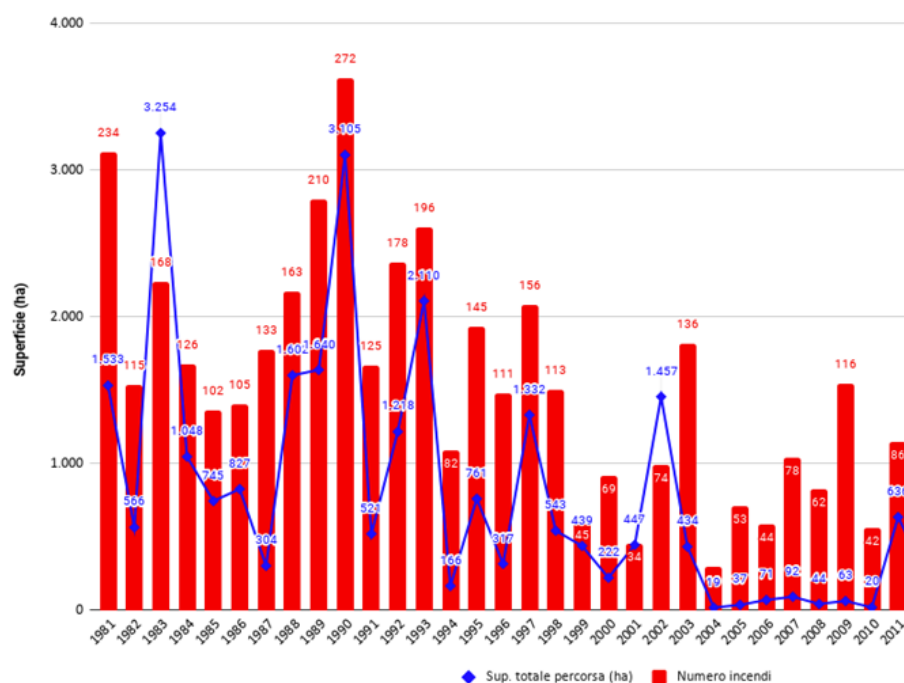
In Lombardy, as in most Alpine regions, the critical period for forest fires occurs between late winter and spring, a period in which the main factors favoring their ignition and spread are lack of rainfall and the Foehn wind, combined with minimal vegetative vigor. The indicators (Figs. 1 and 2) do not show a trend but rather interannual fluctuations. The 1990-2000 decade shows a higher incidence of events, both in number and burned area, parameters that tend to decrease in the 2000-2010 decade. In the 2010-2020 decade, a peak was observed in 2017 and, in the most recent five-year period, an increase in the average area per fire (large fires are less easily controlled). In 2020, the reduction in non-forested burned areas can also be attributed to restrictions on population mobility related to the COVID-19 pandemic.

Risk Rating

Low Risk

Italy Veneto	Indicator
2.2.11	The impacts of natural processes such as fires, pests and diseases shall be managed.
Supply Base Verifiers	National law: - Law Decree no. 34/2008 https://www.gazzettaufficiale.it/eli/id/2018/04/20/18G00060/sg Regional Forestry Regulation n. 2/2020 https://bur.regione.veneto.it/BurvServices/pubblica/DettaglioRegolamento.aspx?id=413790 Regional website: https://www.regione.veneto.it/documents/90748/2992884/Incendi+1981-2020/c9fca3c9-238d-4bc9-9f71-c10fa8a6a499?t=1611577472448 Forest fire organization: https://www.regione.veneto.it/web/protezione-civile/lorganizzazione Regional guide about Bark Beetle: https://www.regione.veneto.it/documents/10701/12279177/Linee_guida_regionali_di_difesa_dal_bostrico_sett2021.pdf/d73ea271-52ac-4e47-9641-d5d8ec82d8f1 Bark beetle fight regional grants: https://www.regione.veneto.it/documents/10701/13929899/Dgr_1502_23_AllegatoA.pdf/c3644f9e-1550-48dd-b79d-7a9a1f6563cd
Risk Rating justification	Forest fire prevention is subject to National forest law (Law Decree no. 34/2008, at article 7). Consequently Regional Forestry Regulation n. 2/2020 includes ruling about fire and diseases prevention measures and natural regeneration of forests hit by fire. Forest operations are supervised in Italy by the national army of Gruppo Carabinieri Forestale that stand as rural police; they may issue fines in cases of non-conformity in the matter of respect of Regional Forestry Regulation application. Forest fire prevention in Veneto is centrally and locally organized. The central Forestry Organizational Unit is in charge of 5 offices with provincial territorial jurisdiction (Belluno, Padua-Rovigo, Treviso-Venice, Verona, Vicenza), coordinates the extinguishing of forest fires by regional staff, volunteers, National Fire Brigade. The Forestry Organizational Unit also deals with post-fire activities such as surveys of the areas affected by the fire, construction of water supply tanks, helicopter pads and more. Number and surfaces of forest fires are decreasing, as stated by the following histogram (1981-2020):

Regione del Veneto - Incendi boschivi (1981 - 2020)



A high magnitude storm occurred in Veneto and Trentino in 2018 called "Vaia storm". It involved a huge portion of the mountains and gusts of wind (wind load generated on trees) produced different kinds of impact on forests, determining different levels of incidence of damage.

Apine forests in Veneto region reported approximately 2.7 million m³ of felled trees and extensive crashes were recorded in some valleys, for an overall of surface of over 18000 ha, corresponding to 4.4% of the forest area of Veneto (and over 42000 in the Alps, leading to 8.5 million m³ of felled trees).

Veneto Region promptly developed a procedure for authorizations in clearing all felled trees both in private and public forests (through tenders), showing high level of organization in the management of the natural damages. Local lumberjacks were involved, as well as many others from other Regions of Italy or neighboring nations, such as Austria and Slovenia.

2018 felled trees were removed, but the infection of xylophagous insects is seriously progressing, causing death in many trees that survived the storm. Veneto Region created Monitoring Unit about spread of damages and in 2021 guidelines were published to pinpoint proper procedures to fight this secondary severe disturbance, with the support of the University of Padova. Many activities are in progress for re-forestation of most affected areas. Since 2023, there are grants for reforestation also in forest areas affected by the bark beetle.

	This does not apply to TOF Group 2A, 3A.
Risk Rating	Low Risk

Spain 6 regions in East and South Spain	Indicator
2.2.11	The impacts of natural processes such as fires, pests and diseases shall be managed.
Supply Base Verifiers	Law 21/2015, of July 20, which modifies Law 43/2003, of November 21, of Forestry): https://www.boe.es/eli/es/l/2015/07/20/21 Decree 3769/1972, of 23 December, approving the Regulation of Law 81/1968 of 5 December on Forest Fires. https://www.boe.es/eli/es/d/1972/12/23/3769 FSC-NRA-ES V1-1 NATIONAL RISK ASSESSMENT FOR SPAIN: https://ic.fsc.org/en/document-center/id/309 Forest fires: https://www.mapa.gob.es/es/desarrollorural/temas/politicaforestal/incendios-forestales/default.aspx Forest fire regulations: https://www.mapa.gob.es/es/desarrollorural/legislacion/leg-espanola-forestal-incendios.aspx Forest Fire Statistics: https://www.mapa.gob.es/es/desarrollorural/estadisticas/incendios_default.aspx Forest fire data 2017: https://www.mapa.gob.es/es/desarrollorural/estadisticas/iiff_2017_def_tcm30-446071.pdf Andalusia: Law 2/1992, of 15 June, Forestry law of Andalucía: https://www.juntadeandalucia.es/boja/1992/57/1 Law 5/1999 on the Prevention and Combatting of Forest Fires in Andalucía: https://www.juntadeandalucia.es/boja/1999/82/1 Aragon: General information on forest fires: http://www.aragon.es/DepartamentosOrganismosPublicos/Departamentos/DesarrolloRuralSostenibilidad/AreasTematicas/MA_MedioForestal/IncendiosForestales?channelSelected=302890292fb3a210VgnVCM100000450a15acRCRD Legislation on forest fires: https://www.aragon.es/DepartamentosOrganismosPublicos/Departamentos/20DesarrolloRuralSostenibilidad/AreasTematicas/MA_MedioForestal Catalunya: http://agricultura.gencat.cat/ca/ambits/medi-natural/ Forest fire prevention: http://agricultura.gencat.cat/ca/ambits/medinatural/gestio-forestal/dar_obres_forestals/dar_prevenccio_incendis/ Castilla-la Mancha http://www.castillalamancha.es/tema/medio-ambiente/ Murcia: http://www.murcianatural.carm.es/web/guest/ambito-forestal Forest fire prevention: http://www.murcianatural.carm.es/web/guest/visorcontenidosdinamicos?artId=126706

	Valencia Law 3/1993, of 9 December, of the Generalitat Valenciana, Forestry Law of the Valencian Community consolidated text: http://www.dogv.gva.es/auto/dogv/docvpub/rlgv/1993/L_1993_03_ca_L_2017_21.pdf Spanish Society of Forest Sciences: http://secforestales.org Montero, G. and SERRADA, R. 2013. La situación de los Bosques y el sector en España - ISFE 2013 Sociedad Española de Ciencias Forestales. Lourizán (Pontevedra). http://secforestales.org/content/informe-isfe 7th Spanish Forestry Congress. The situation of forests and the forestry sector in Spain. ISFE 2017: https://7cfe.congresoforestal.es/content/lasituacionde-los-bosques-y-el-sector-forestal-en-espana-isfe-2017
Risk Rating justification	With regards pests and diseases, Duferco relies on the existence of a clear, regulatory framework, action plans and data monitoring networks, and competent administrations responsible for data management and control, as most of the responsibility lies with public administrations. With regards forest fires, they currently represent one of the greatest threats to forests in Spain. Between 1990 and 2010, the annual average number of forest fires was 17,864, with a maximum of 25,557 in 1995. During the same period, the annual average area burned was 139,775 ha, of which approximately 51,000 ha were forested areas, and 88,000 ha were areas without trees. Climate change affects susceptibility of forests to disturbances, as well as frequency, intensity, duration and timing of these disturbances. For example, there may be increased fuel accumulation in forests, fire seasons may last for longer and more extreme weather conditions may occur more frequently. In addition, frequency and intensity of forest fires is also expected to increase. The current trend for forests is the increase of dangerous vegetation structure, as they are accumulating biomass that was once used to cover livestock stands and as firewood, and there is also a greater spatial continuity of forest fuel, as vegetation covers more and more previously ploughed fields. The data for 2017 indicates that the total number of incidents has increased by 11.57% compared to the average for the last decade, with an increase of 5.80 % in the number of outbreaks (area ≤1 ha) and 23.05 % in the number of fires (area > 1 ha) respectively. It was the year with the third highest number of incidents of the last decade. According to the provisional statistics provided by the competent services of the regional administrations, in 2017 there were 56 Major Forest Fires (MFFs), a category that includes fires exceeding 500 hectares of forest affected. In total the registered MFFs accounted for 54.96% of the total area affected and 0.41% of the total number of incidents. Northwest Spain was the area hit hardest by MFFs, with 73.21% of them taking place there and 74.54% of the area burned by them. In October alone, there were 31 MFFs (55% of the annual total), all in the Northwest region.

According to the data, it seems that the recurrence of catastrophic years in terms of fires in Spain, is about every 5 years, the last two being 2012 (which affected Castilla y León and the Valencian Community in particular) and 2017 (which affected the Northwest of the peninsula in particular: Galicia, Asturias, León).

At management level, a large extent of the responsibility for forest fires lies with public administrations. However, forest owners have certain responsibilities for the proper management of the forest and of fire prevention and defense infrastructures.

On forests management level there are 2 options:

- Public forests. The administration itself is the manager of these forests and is therefore responsible for maintaining adequate defense and prevention infrastructure: level of implementation of these infrastructures can be considered adequate.
- Private forests. Existing legal framework specify obligations or responsibilities of forest managers/owners concerning prevention/defense against forest fires.

In Andalusia laws require preparation of Forest Fire Prevention Plans or Management Plans and implementation of the prevention/defence measures established either in this document or in the Plans drawn up by the administration.

In Aragon Forest management covers a total forest area of 2.5 million hectares, representing 53% of the area of the Autonomous Community. There is high priority for forest fires. Forestry administration produces mapping of High Risk Areas. Period of danger of forest fires is established usually from April 1st to October 15th.

In Catalunya, large part of fire prevention activity is concentrated in the priority protection periods (PPP). Risk sectors or PPPs are territorial areas with a large forest fire peril and which, due to the continuity of the forest mass, fires may start and then convert into a large forest fire (GIF), defined here as more than 500 ha. The main objective is to plan the necessary measures in a territorial area that represents a unit of action, broad enough to allow planning with an integral vision, so that strategic prevention infrastructures for the whole area are identified. The PPI is used as a basis for direct decisions that the Directorate General of the Natural Environment makes in the prevention of fires on the territory.

In Castilla-La Mancha the responsible authority is the Dirección General de Política y Espacios Naturales.

In the Valencian Community the planning of the actions is carried out by the Generalitat Valenciana through the approval of forest fire sectoral plans; municipalities may draw up local fire plans, subject to the sectoral plans. In areas at high risk of forest fires, forest owners and local entities shall be obliged to implement appropriate measures to prevent forest fires and shall carry out, at their own cost, the preventive measures, within the deadlines and under the conditions established in the fire prevention plans.

In Murcia, forestry administration produces mapping of High Risk Areas and it approves the defense plans. These plans establish preventive works to be carried out, including appropriate forestry treatments, firebreak areas,

	access roads and water points to be realized by the owners and methods for executing the work, depending on the legal status of the land, by means of treaties, agreements, temporary assignments of the land to the Administration, aid or grants or, where appropriate, subsidiary execution by the Administration. Forestry works carried out by Duferco and its suppliers normally involves forest treatments such as thinning and clearing; they have a positive impact on the prevention of forest fires, as they reduce density in the forest cover and biomass volume. In fact, in many areas of the Valencian Community where works have been carried out, the occurrence of forest fires has decreased significantly. In general, these were forest areas that had undergone virtually no forest management in the last 30-40 years. This does not apply to TOF Group 3A.
Risk Rating	Specified Risk

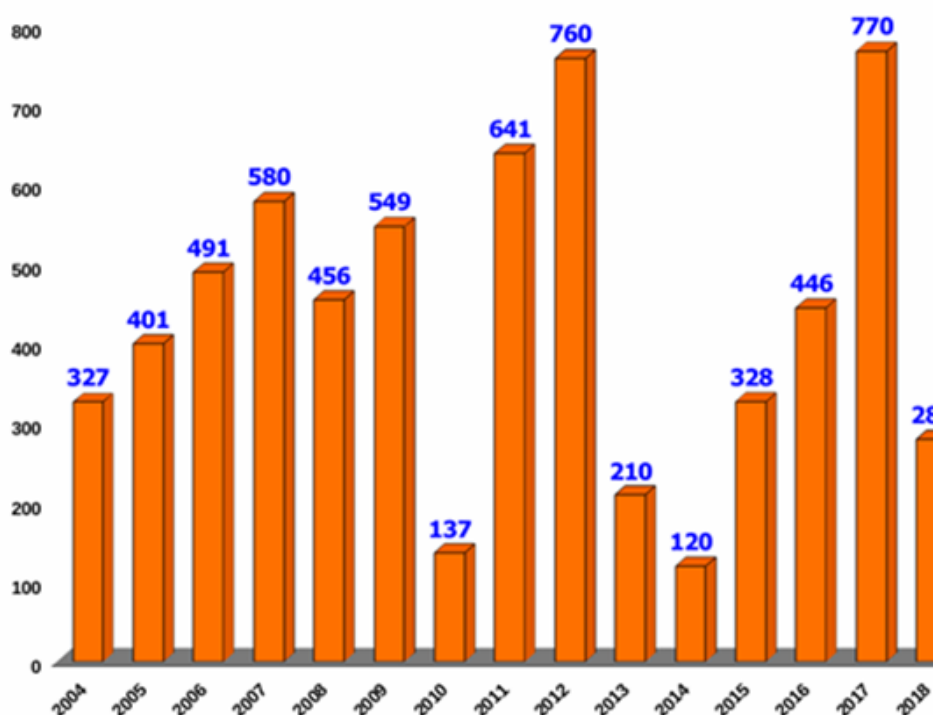
Italy Tuscany	Indicator
2.2.11	The impacts of natural processes such as fires, pests and diseases shall be managed.
Supply Base Verifiers	-Regional Forestry Law no. 39/2000 https://raccoltanormativa.consiglio.regione.toscana.it/articolo?urndoc=urn:nir:regione.toscana:legge:2000-03-21;39 Legambiente Fire Report of 2022: https://www.legambiente.it/wp-content/uploads/2022/08/report-incendi-2022.pdf Statistics about forest fires in Tuscany: https://www.regione.toscana.it/emergenza-e-sicurezza/speciali/aibantincendi-boschivi/statistica-incendi-boschivi RAF Tuscany Region https://www.regione.toscana.it/-/presentazione-del-rapporto-sullo-stato-delleforeste-in-toscana
Risk Rating justification	The authorization process guarantees that all the precautionary activities are enlisted and Forestry Police supervise that they are followed during silvicultural works a consequence of climate changes, some forestry species are more susceptible to pathogens attacks being in severe stress condition due to the lack of precipitations as well as higher temperatures. Forestry activities could solve or prevent huge damages; in particular autochthonous forest species are used in reforestation considering that they are normally less affected by pest attacks. Even if the Regional Law does not allow the use of chemical products against pests in forests, it consents and regulates some specific forestry activities to prevent and enhance the forestry response to pest attacks. The same happens in case of plantations. Forestry activities could both negatively and positively impact on fire risk, especially in the summer so it is not allowed to carry on forestry activities from the 1th July to the 31th August in Tuscany. The Regional Law regulate

this specific aspect. Forestry Police guarantee the rules are followed. Every day the LaMMA produces a bulletin about the fire risk in all the regional surface (Bollettino rischio incendi - Regione Toscana)

The authorization process guarantees that all the precautionary activities are enlisted and Forestry Police supervise that they are followed during silvicultural works.

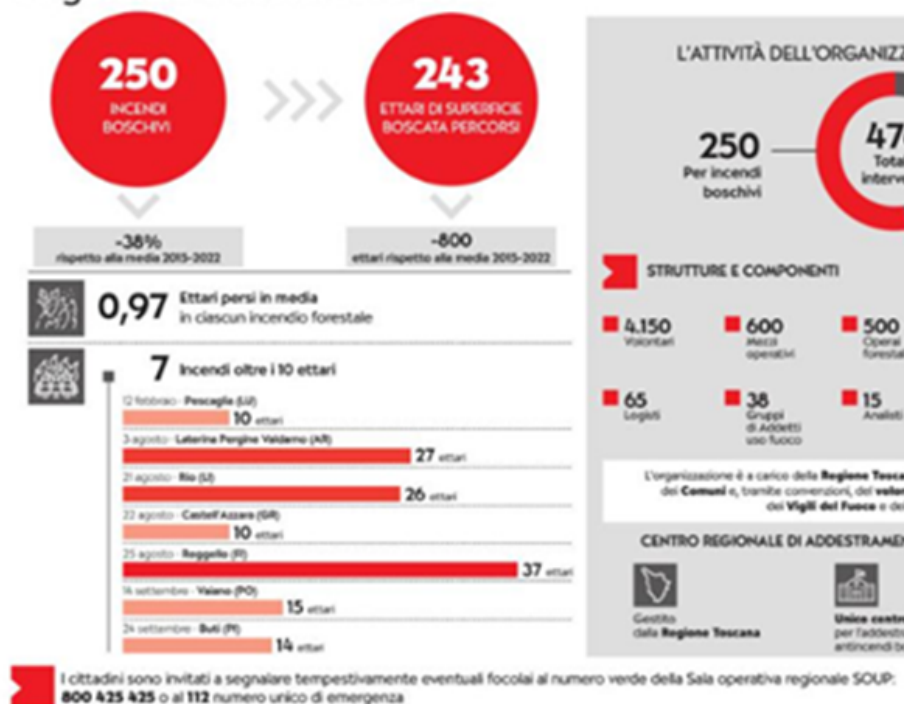
According to the Fire Report of 2022, from 2008 to 2021, 6.149 ha have been crossed by fire and this fact has negative impacts, including the climate change sphere increasing the CO2 emission in atmosphere and the temperatures growth.

The Regional Law dedicate a large space to fires risk and its specific prevention, taking into consideration also forestry activities to prevent fires and protect natural areas.



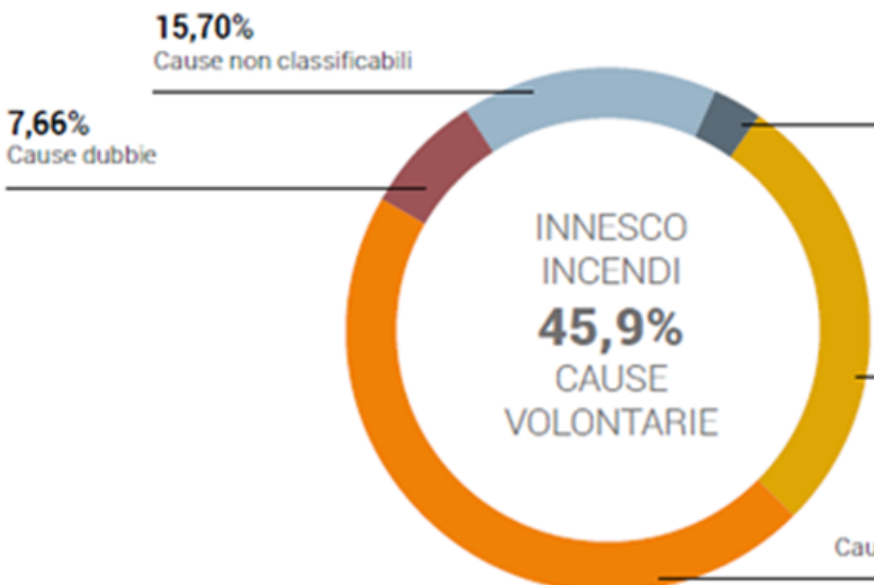
Forestry fires in Tuscany from 2004 to 2023. Source: 11eead49-6866-82a2-c818-3092531add70 (regione.toscana.it)

Gli incendi boschivi in Toscana da gennaio a settembre 2023



Source: Statistica incendi boschivi - Regione Toscana

According to regional data most of the fires are due to voluntary causes and only the 3% is related to natural causes. Source: RAF Tuscany Region.

	 15,70% Cause non classificabili 7,66% Cause dubbie INNESCO INCENDI 45,9% CAUSE VOLONTARIE Cause v This does not apply to TOF Group 2A, 3A.
Risk Rating	Low Risk

Italy Apulia	Indicator
2.2.11	The impacts of natural processes such as fires, pests and diseases shall be managed.
Supply Base Verifiers	Several Decrees of the Manager of Phytosanitary Observatory: last Decree was issued in April 24th 2024, n. 45, regarding: "Update of <i>Xylella fastidiosa</i> subspecies <i>fastidiosa</i> ST1 infected area in application of EU Reg. 2020/1201." The infected zone and the buffer zone are constantly monitored and updated. The focus of agricultural policy and resources are all about the fight to <i>Xylella</i> infection in Apulia. Corrective measures are in place and eradication is done day by day within the infected area.
Risk Rating justification	<i>Xylella fastidiosa</i> is regulated in the EU as quarantine pest under Regulation (EU) 2016/2031 ('Plant Health Law') on protective measures against plant pests. Its introduction into and spreading within all Member States is banned. In case of detection, irrespective of the symptoms and subspecies concerned, all necessary measures shall be

	taken to eradicate it, or in case of approval by Commission Regulation, to inhibit its further spread if eradication is no longer achievable. The following Commission Implementing Regulation (EU) 2020/1201 of 14 August 2020 regards measures to prevent the introduction into and the spread within the Union of <i>Xylella fastidiosa</i>. National law: MIPAF Ministry Decree date January 24th 2022 concerning the endorsement of a national Plan of emergency measures for <i>Xylella</i> ("Adozione del Piano di emergenza nazionale per il contrasto di <i>Xylella fastidiosa</i>"), descending from the previous national Law n. 144/1951, that provides protection for all olive trees. Regional laws and application of laws: Regional Law n. 4/2017 "Management of bacteriosis from <i>Xylella fastidiosa</i> in the Apulian Region".
Risk Rating	Low Risk

Italy Lazio	Indicator
2.2.11	The impacts of natural processes such as fires, pests and diseases shall be managed.
Supply Base Verifiers	Fire Report 2024 draft by ISPRA: https://www.isprambiente.gov.it/files2025/attivita/report_incendi_2024_ispra.pdf https://indicatoriambientali.isprambiente.it/it/patrimonio-forestale/superfici-diecosistemi-forestali-percorse-da-incendi-stato-e-variazioni National Plan 2024 about forest fire prevention: https://www.protezionecivile.gov.it/it/approfondimento/campagna-antincendioboschivo-2024/ Regional Forestry Law: https://www.consiglio.regione.lazio.it/consiglioregionale/?vw=leggiregionalidettaglio&id=8715&sv=vigente Regional Forestry Regulation: https://www.regione.lazio.it/regolamenti-regionali-testo-originale/regolamentoregionale-18-aprile-2005-n-7 Risk Rating justification According to the Fire Report 2024
Risk Rating justification	According to the Fire Report 2024 draft by ISPRA, Lazio has been affected by forest fires less than other Regions in Italy and the surfaces burned are less than in the period from 2020 to 2023.

Regione	AB Tot	AB TNC	AB T1	AB T2	AB T3	AB T34
Sicilia	9011	62	143	666	323	0
Calabria	4273	52	628	287	189	0
Sardegna	2155	0	45	448	0	0
Puglia	2138	11	37	58	19	0
Basilicata	729	10	86	33	6	0
Lazio	507	3	59	32	10	0
Campania	474	7	121	40	0	0
Umbria	113	2	15	32	2	0
Abruzzo	80	0	5	2	3	0
Piemonte	80	0	13	0	0	0
Molise	56	1	6	0	0	0
Toscana	55	0	21	0	1	0

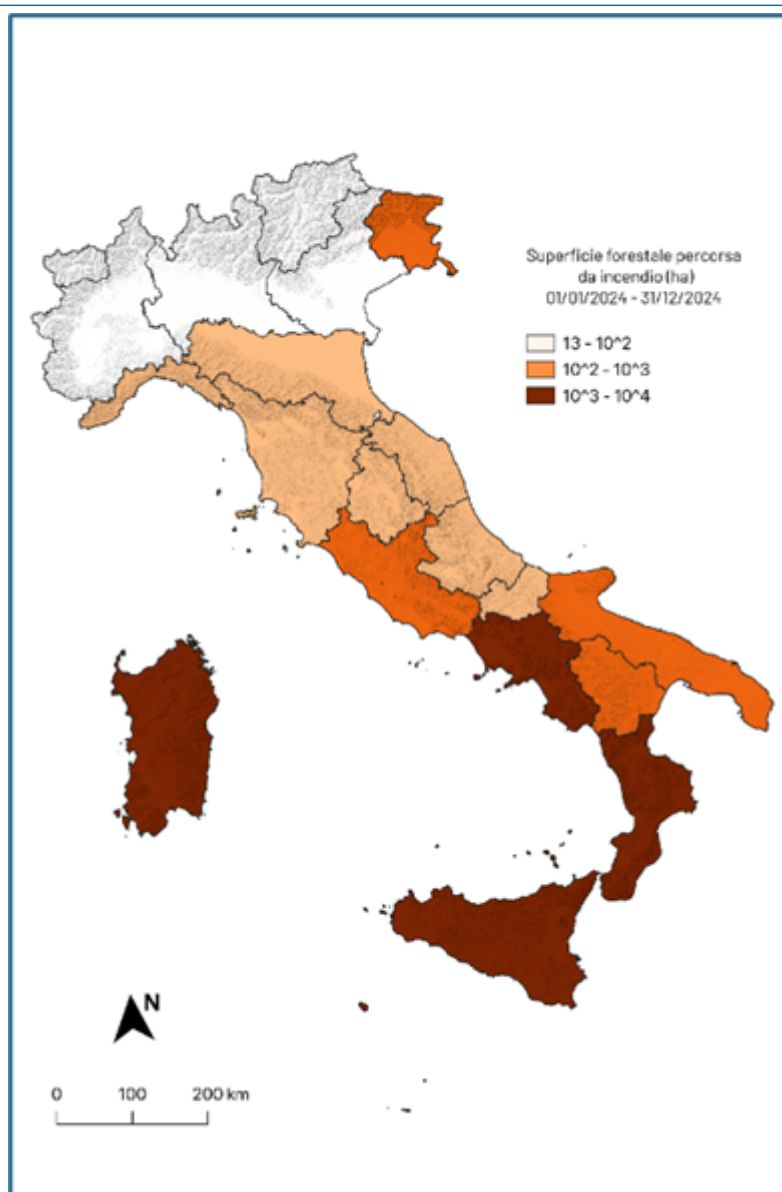
Tab. Description: AB TOT corresponds to the total surface affected by fires, AB TNC forests not classified, AB T1 deciduous broadleaves forests, AB T2 evergreen broadleaves forests, AB T3 coniferous forests, AB T34 sub alpine forests, AB For total forestry surface affected by fires.

The Regional Law and Regulation dedicate a large space to fires risk and its specific prevention, taking into consideration also forestry activities to prevent fires and protect natural areas.

The most of the times fires are due to voluntary causes but there are natural factors affecting them (Piano antincendio boschivo 2024).

Mostly forest fires are due to voluntary causes but there are natural factors affecting them (data from National Plan 2024 about forest fire prevention).

The Regional Law and Regulation dedicate a large space to fires risk and its specific prevention, taking into consideration also forestry activities to prevent fires and protect natural areas.

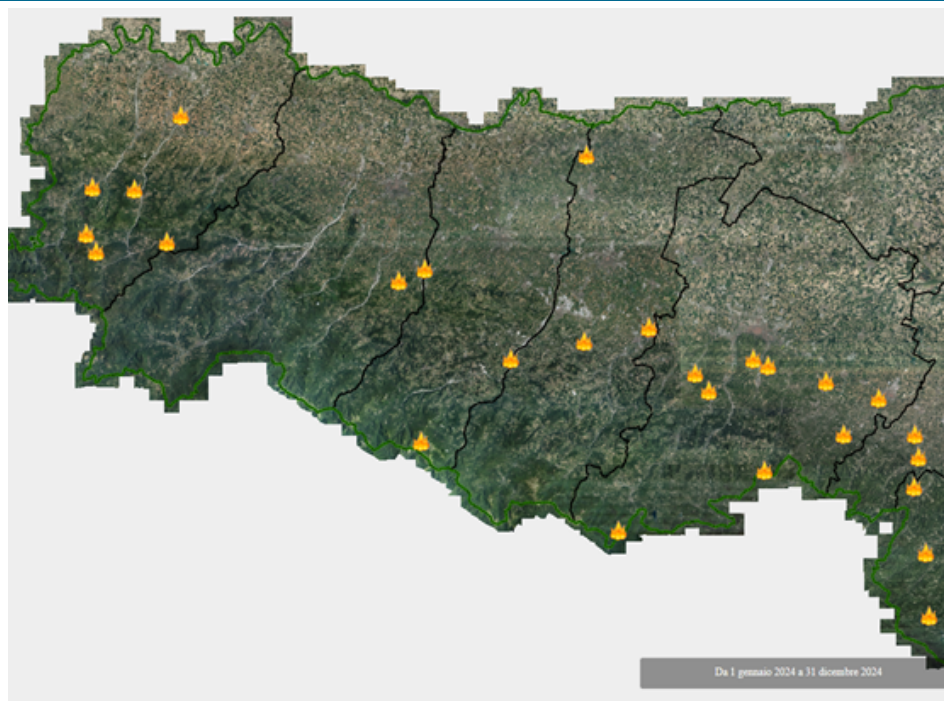


Because of climate changes, some forestry species are more susceptible to pathogens attacks being in severe stress conditions, due to the lack of precipitations as well as higher temperatures. Forestry activities could solve or prevent huge damages, such as the use of autochthonous forest species in reforestation that are normally prescribed in Italy.

Forestry activities could both negatively and positively impact on fire risk, especially in the summer so it is not allowed to carry on forestry activities. Generally, forestry activities are allowed in autumn/winter, except in case of activities related to fires prevention or phytosanitary needs. About protected areas the period might change according to the specific Management Plan of the protected area. The Regional Law and Regulation regulate this specific aspect. Forestry Police guarantee the rules are followed.

	The authorization process guarantees that all the mitigation activities are enlisted and Forestry Police supervise that they are followed during silvicultural works. This does not apply to TOF Group 2A, 3A.
Risk Rating	Low Risk

Italy Emilia-Romagna	Indicator
2.2.11	The impacts of natural processes such as fires, pests and diseases shall be managed.
Supply Base Verifiers	Forest fires in Emilia-Romagna from 1994 to 2024 Source: Regional Plan for prevention, forecast and active fight against forest fires (AIB Plan 2022-2026) https://ambiente.regione.emilia-romagna.it/it/parchi-natura2000/foreste/gli-incendi-boschivi/il-piano-regionale-contro-gli-incendi-boschivi-e-le-attivita-antincendio Interactive cartography - Regional Cadastre of areas affected by fire: https://ambiente.regione.emilia-romagna.it/it/parchi-natura2000/foreste/gli-incendi-boschivi/il-catasto-regionale-delle-aree-percorse-dal-fuoco Piano AIB 2022-2026 (updated 2025): https://protezionecivile.regione.emilia-romagna.it/novita/notizie/2024/giugno/incendi-boschivi-verde-fino-16-giugno-2024/piano-regionale-aib.pdf/@download/file/Piano-AIB-2022_26.pdf ISPRA Report 2023: https://www.isprambiente.gov.it/it/istituto-informa/comunicati-stampa/anno-2024/incendi-boschivi-nel-2023 Regional Forestry Regulation no. 3/2018: https://demetra.regione.emilia-romagna.it/al/articolo?urn=er:assemblealegislativa:regolamento:2018;3
Risk Rating justification	According to the Regional Plan for the prevention, forecast and active fight against forest fires (AIB Plan 2022-2026, updated 2025), from 1998 to 2024, approximately 1530 hectares have been affected by forest fires in Emilia-Romagna. This phenomenon has numerous negative impacts, including effects on climate change through increased CO2 emissions into the atmosphere and temperature rise. Positive trend: In 2023, Emilia-Romagna was one of only 5 Italian regions (together with Friuli Venezia Giulia, Veneto, Marche and Umbria) that did not experience large forest fires (as detected by the EFFIS system), according to ISPRA (Italian Institute for Environmental Protection and Research). Regional laws dedicate considerable attention to fire risk and specific prevention measures, taking into consideration forestry activities to prevent fires and protect natural areas.



The authorization process guarantees that all precautionary activities are listed and the Carabinieri Forestali (Forest Carabinieri) supervise that they are followed during silvicultural works.

As a consequence of climate changes, some forestry species are more susceptible to pathogen attacks being in severe stress conditions due to lack of precipitations as well as higher temperatures. Forestry activities could solve or prevent huge damages; in particular, autochthonous forest species are used in reforestation considering that they are normally less affected by pest attacks.

The Regional Forestry Regulation no. 3/2018 regulates specific forestry activities to prevent and enhance the forestry response to pest attacks. The same approach applies to plantations.

Forestry activities could both negatively and positively impact fire risk, especially in summer. According to Regional Forestry Regulation n. 3/2018 (articles 58, 59, 60), burning of residues from agricultural and forestry works near forests is regulated with specific restrictions and requirements.

During the "attention phase" for forest fires (typically from July 1st to September 15th), burning of residues near forests can only be carried out in the morning hours in the absence of wind, and fires must be extinguished by 11:00 AM.

When "grave pericolosità" (high danger state - Orange Code) is declared, an absolute prohibition to light fires or use tools that produce flames, sparks or embers within forest areas comes into force, with significantly elevated sanctions.

The Agenzia Regionale per la Sicurezza Territoriale e la Protezione Civile (Regional Agency for Territorial Security and Civil Protection), in coordination

	with the Regional Fire Brigade Direction, the Regional Carabinieri Forestale Command, and ARPAE-SIMC (Regional Agency for Environmental Prevention and Energy - Hydro-Meteo-Climate Service), produces daily bulletins about fire risk across the entire regional territory during the fire season. Fire risk bulletins are available at: https://protezionecivile.regione.emilia-romagna.it/rischi-previsione-prevenzione/rischio-incendi/bollettini-incendi-boschivi The Carabinieri Forestali guarantee that rules are followed through daily patrols during the attention phase (typically 18 patrols dedicated to forest fire prevention and repression of illegal behaviors). The authorization process ensures that all precautionary activities are listed and properly supervised during silvicultural works.
Risk Rating	Low Risk

Italy Emilia-Romagna	Indicator
2.2.12	Genetically modified trees shall not be used.
Supply Base Verifiers	- European Directive 2001/18/CE about deliberate emission of genetically modified organism, in endorsement of Cartagena Protocol (2004); - European Directive 2015/412 that modifies the previous one; - National Law Decree n. 224/2003 (d.lgs. 8 luglio 2003, n. 224); - National Law Decree n. 227/2016 (d.lgs. 14 novembre 2016, n. 227). https://www.mase.gov.it/pagina/limitazione-o-divieto-di-coltivazione-degli-ogm-nellunione-europea-e-italia
Risk Rating justification	Genetically modified trees cannot be used in Italy.
Risk Rating	Low Risk

Italy Lazio	Indicator
2.2.12	Genetically modified trees shall not be used.
Supply Base Verifiers	European Directive 2001/18/CE about deliberate emission of genetically modified organism, in endorsement of Cartagena Protocol (2004); - European Directive 2015/412 that modifies the previous one; - National Law Decree n. 224/2003 (d.lgs. 8 luglio 2003, n. 224); - National Law Decree n. 227/2016 (d.lgs. 14 novembre 2016, n. 227). https://www.mase.gov.it/pagina/limitazione-o-divieto-di-coltivazione-degli-ogm-nellunione-europea-e-italia
Risk Rating justification	Genetically modified trees cannot be used in Italy. This applies to forests and also to TOF Group 3A, but Italian laws forbid the use of OGM in any case in Italy.

Risk Rating	Low Risk
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Italy Apulia	Indicator
2.2.12	Genetically modified trees shall not be used.
Supply Base Verifiers	- European Directive 2001/18/CE about deliberate emission of genetically modified organism, in endorsement of Cartagena Protocol (2004); - European Directive 2015/412 that modifies the previous one; - National Law Decree n. 224/2003 (d.lgs. 8 luglio 2003, n. 224); - National Law Decree n. 227/2016 (d.lgs. 14 novembre 2016, n. 227). https://www.mase.gov.it/pagina/limitazione-o-divieto-di-coltivazione-degli-ogm-nellunione-europea-e-italia
Risk Rating justification	Genetically modified olive trees cannot be used in Italy.
Risk Rating	Low Risk

Italy Tuscany	Indicator
2.2.12	Genetically modified trees shall not be used.
Supply Base Verifiers	European Directive 2001/18/CE about deliberate emission of genetically modified organism, in endorsement of Cartagena Protocol (2004); - European Directive 2015/412 that modifies the previous one; - National Law Decree n. 224/2003 (d.lgs. 8 luglio 2003, n. 224); - National Law Decree n. 227/2016 (d.lgs. 14 novembre 2016, n. 227). https://www.mase.gov.it/pagina/limitazione-o-divieto-di-coltivazione-degli-ogm-nellunione-europea-e-italia
Risk Rating justification	Genetically modified trees cannot be used in Italy. This applies to forests and also to TOF Group 3A, but Italian laws forbid the use of OGM in any case in Italy.
Risk Rating	Low Risk

Spain 6 regions in East and South Spain	Indicator
2.2.12	Genetically modified trees shall not be used.
Supply Base Verifiers	- European Directive 2001/18/CE about deliberate emission of genetically modified organism, in endorsement of Cartagena Protocol (2004); - European Directive 2015/412 that modifies the previous one; - Law 9/2003, of April 25, which establishes the legal regime of confined use, voluntary release and commercialization of genetically modified organisms. https://www.boe.es/buscar/doc.php?id=BOE-A-2003-8588

	Resolutions of GMO use by Autonomous Communities: https://www.miteco.gob.es/es/calidad-y-evaluacionambiental/temas/biotecnologia/organismos-modificados-geneticamenteomg-/registro-publico-OMG/CCAA.aspx List of species that could be approved for GMO use: https://www.mapa.gob.es/es/agricultura/temas/medios-deproduccion/semillas-y-plantas-de-vivero/registro-de-variedades/reg-de-variedadescomerciales Genetically modified poplar authorization: https://www.miteco.gob.es/es/calidad-y-evaluacionambiental/temas/biotecnologia/SNIF_B_ES_12_30_tcm30-185784.pdf
Risk Rating justification	The activities with genetically modified organisms (GMOs) are regulated in Spain by Royal Decree 178/2004, of 30 January, approving the General Regulation for the Development and Execution of the Law 9/2003 (25 April), which establishes the legal regime of confined use, voluntary release and commercialization of genetically modified organisms. There is no total prohibition on the commercial use of GMO, but it is strictly regulated, and licensing is required for this activity. However, currently, licences have only been granted for the marketing of agricultural products (example: corn). No forest species are included in the Ministry of Agriculture, Fisheries and Food's database of commercial varieties with GMO. For trial purposes, authorizations were granted in 2012 for one test with poplar (<i>Populus</i> spp.). These trials continued until 2015 and currently there are no ongoing tests. There are no forests with genetically modified trees. As for TOF Group 3A, the use of OGM trees is not allowed in any case in Spain.
Risk Rating	Low Risk

Italy Veneto	Indicator
2.2.12	Genetically modified trees shall not be used.
Supply Base Verifiers	European Directive 2001/18/CE about deliberate emission of genetically modified organism, in endorsement of Cartagena Protocol (2004); - European Directive 2015/412 that modifies the previous one; - National Law Decree n. 224/2003 (d.lgs. 8 luglio 2003, n. 224); - National Law Decree n. 227/2016 (d.lgs. 14 novembre 2016, n. 227). https://www.mase.gov.it/pagina/limitazione-o-divieto-di-coltivazione-degliogmnellunione-europea-e-italia
Risk Rating justification	Genetically modified trees cannot be used in Italy. This applies to forests and also to TOF Group 3A, but Italian laws forbid the use of OGM in any case in Italy.
Risk Rating	Low Risk

Italy Lombardy	Indicator
2.2.12	Genetically modified trees shall not be used.
Supply Base Verifiers	European Directive 2001/18/CE about deliberate emission of genetically modified organism, in endorsement of Cartagena Protocol (2004); - European Directive 2015/412 that modifies the previous one; - National Law Decree n. 224/2003 (d.lgs. 8 luglio 2003, n. 224); - National Law Decree n. 227/2016 (d.lgs. 14 novembre 2016, n. 227). https://www.mase.gov.it/pagina/limitazione-o-divieto-di-coltivazione-degli-ogm-nell'unione-europea-e-italia
Risk Rating justification	Genetically modified trees cannot be used in Italy. This applies to forests and also to TOF Group 3A, but Italian laws forbid the use of OGM in any case in Italy.
Risk Rating	Low Risk

Spain 6 regions in East and South Spain	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	NDC Registry: https://unfccc.int/NDCREG
Risk Rating justification	Route A applies to Spain. Spain is a party of Paris Agreement, that 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 as a member State of European Union in date 19/10/2023. Forests and woody crops capture CO₂ and the loss of sink due to cuttings is compensated by booster growth of the remaining trees.

Risk Rating	Low Risk
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Italy Tuscany	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	NDC Registry: https://unfccc.int/NDCREG https://www.ilsole24ore.com/art/in-italia-mai-cosi-tante-foreste-secoli-efuturoebiocities-ADXdmPi https://www.repubblica.it/economia/rapporti/osserva-italia/lestorie/2022/05/03/news/lavanzata_delle_foreste_sono_un_terzo_dellitalia-347925590/
Risk Rating justification	Route A applies to Italy. Italy is a party of Paris Agreement, that 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 as a member State of European Union in date 19/10/2023. Forests and woody crops capture CO2 and the loss of sink due to cuttings is compensated both by booster growth of the remaining trees and by increasing forested surfaces due to natural invasion of abandoned crops (25% of increase of forest in 25 years, that is over 2 million hectares); this happens in every Region.
Risk Rating	Low Risk

Italy Emilia-Romagna	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	NDC Registry: https://unfccc.int/NDCREG https://www.ilsole24ore.com/art/in-italia-mai-cosi-tante-foreste-secoli-e-futuro-e-biocities-ADXdmPi https://www.repubblica.it/economia/rapporti/osserva-italia/le-storie/2022/05/03/news/lavanzata_delle_foreste_sono_un_terzo_dellitalia-347925590/
Risk Rating justification	Route A applies to Italy. Italy is a party of Paris Agreement, that 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 as a member State of European Union in date 19/10/2023. Forests and woody crops capture CO2 and the loss of sink due to cuttings is compensated both by booster growth of the remaining trees and by increasing forested surfaces due to natural invasion of abandoned crops (25% of increase of forest in 25 years, that is over 2 million hectares).
Risk Rating	Low Risk

Italy Apulia	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	

	NDC Registry: https://unfccc.int/NDCREG https://www.ilsole24ore.com/art/in-italia-mai-cosi-tante-foreste-secoli-e-futuro-e-biocities-ADXdmPi?refresh_ce=1
Risk Rating justification	Route A applies to Italy. Italy is a party of Paris Agreement, that 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 as a member State of European Union in date 19/10/2023. Woody crops such olive trees capture CO2 and the loss of sink due to eradications is being compensated by re-plantations and also new plantations of olive trees. Besides, forest cover in Italy has been increasing by over 25% in 30 years, enhancing Italian carbon stock as a whole.
Risk Rating	Low Risk

Italy Lazio	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	NDC Registry: https://unfccc.int/NDCREG Articles about the matter: https://www.ilsole24ore.com/art/in-italia-mai-cosi-tante-foreste-secoli-e-futuro-e-biocities-ADXdmPi?refresh_ce=1 https://www.repubblica.it/economia/rapporti/osserva-italia/lestorie/2022/05/03/news/lavanzata_delle_foreste_sono_un_terzo_dellitalia-347925590/
Risk Rating justification	Route A applies to Italy. Italy is a party of Paris Agreement, that 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 as a member State of European Union in date 19/10/2023. Forests and woody crops capture CO₂ and the loss of sink due to cuttings is compensated both by booster growth of the remaining trees and by increasing forested surfaces due to natural invasion of abandoned crops (25% of increase of forest in 25 years, that is over 2 million hectares); this happens in every Region.
Risk Rating	Low Risk

Italy Lombardy	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	NDC Registry: https://unfccc.int/NDCREG https://www.ilsole24ore.com/art/in-italia-mai-cosi-tante-foreste-secoli-efuturoebiocities-ADXdmPi https://www.repubblica.it/economia/rapporti/osserva-italia/lestorie/2022/05/03/news/lavanzata_delle_foreste_sono_un_terzo_dellitalia-347925590/
Risk Rating justification	Route A applies to Italy. Italy is a party of Paris Agreement, that 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 as a member State of European Union in date 19/10/2023. Forests and woody crops capture CO₂ and the loss of sink due to cuttings is compensated both by booster growth of the remaining trees and by increasing forested surfaces due to natural invasion of abandoned crops (25% of increase of forest in 25 years, that is over 2 million hectares) in every Region.
Risk Rating	Low Risk

Italy Veneto	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	NDC Registry: https://unfccc.int/NDCREG https://www.ilsole24ore.com/art/in-italia-mai-cosi-tante-foreste-secoli-efuturoebiocities-ADXdmPi https://www.repubblica.it/economia/rapporti/osserva-italia/lestorie/2022/05/03/news/lavanzata_delle_foreste_sono_un_terzo_dellitalia-347925590
Risk Rating justification	Route A applies to Italy. Italy is a party of Paris Agreement, that 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 as a member State of European Union in date 19/10/2023. Forests and woody crops capture CO2 and the loss of sink due to cuttings is compensated both by booster growth of the remaining trees and by increasing forested surfaces due to natural invasion of abandoned crops (25% of increase of forest in 25 years, that is over 2 million hectares).
Risk Rating	Low Risk

Italy Veneto	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	Scientific studies about the matter:

	https://www.crea.gov.it/-/ambiente-foreste-per-il-clima-dati-nuovoinventarionazionaleforestale-e-dei-serbatoi-di-carbonio-carabinieri-all4climate-milano-29-30-settembre http://www.biologia.uniba.it/scuola/PhD_programs/publication/pdf/mairota/5.pdf https://www.lanuovaecologia.it/foreste-certificazioni-gestione-sostenibile/
Risk Rating justification	Several studies provide clear evidence that there is a constant increase of forest surface and carbon stock in all Regions in Italy. For instance the governative research centre CREA in 2021 (first mentioned below) assessed that in 15 years from 2005 to 2020, the carbon stock increased by 15% at least and trends are currently similar. Option A is the ordinary applicable option for forests in Italy; Option B applies to few cases where natural processes occurred and the cutting aims to speed recover or prepare for re-forestation, under a detailed authorization issued by competent authority. This does not apply to TOF Group 2A, 3A.
Risk Rating	Low Risk

Italy Lombardy	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	Scientific studies about the matter: https://www.crea.gov.it/-/ambiente-foreste-per-il-clima-dati-nuovoinventarionazionaleforestale-e-dei-serbatoi-di-carbonio-carabinieri-all4climate-milano-29-30-settembre http://www.biologia.uniba.it/scuola/PhD_programs/publication/pdf/mairota/5.pdf https://www.lanuovaecologia.it/foreste-certificazioni-gestione-sostenibile/
Risk Rating justification	Several studies provide clear evidence that there is a constant increase of forest surface and carbon stock in all Regions in Italy. For instance the governative research centre CREA in 2021 (first mentioned below) assessed that in 15 years from 2005 to 2020, the carbon stock increased by 15% at least and trends are currently similar. Option A is the ordinary applicable option for forests in Italy; Option B applies to few cases where natural processes occurred and the cutting aims to speed recover or prepare for re-forestation, under a detailed authorization

	issued by competent authority. This does not apply to TOF Group 2A, 3A.
Risk Rating	Low Risk

Italy Lazio	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	Scientific studies about the matter: https://www.crea.gov.it/-/ambiente-foreste-per-il-clima-dati-nuovoinventarionazionaleforestale-e-dei-serbatoi-di-carbonio-carabinieri-all4climate-milano-29-30-settembre http://www.biologia.uniba.it/scuola/PhD_programs/publication/pdf/mairotta/5.pdf https://www.lanuovaecologia.it/foreste-certificazioni-gestione-sostenibile/
Risk Rating justification	Several studies provide clear evidence that there is a constant increase of forest surface and carbon stock in all Regions in Italy. For instance the governative research centre CREA in 2021 (first mentioned below) assessed that in 15 years from 2005 to 2020, the carbon stock increased by 15% at least and trends are currently similar. Option A is the ordinary applicable option for forests in Italy; Option B applies to few cases where natural processes occurred and the cutting aims to speed recover or prepare for re-forestation, under a detailed authorization issued by competent authority. This does not apply to TOF Group 2A, 3A.
Risk Rating	Low Risk

Italy Apulia	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	Not applicable.
Risk Rating justification	Not applicable for TOF.

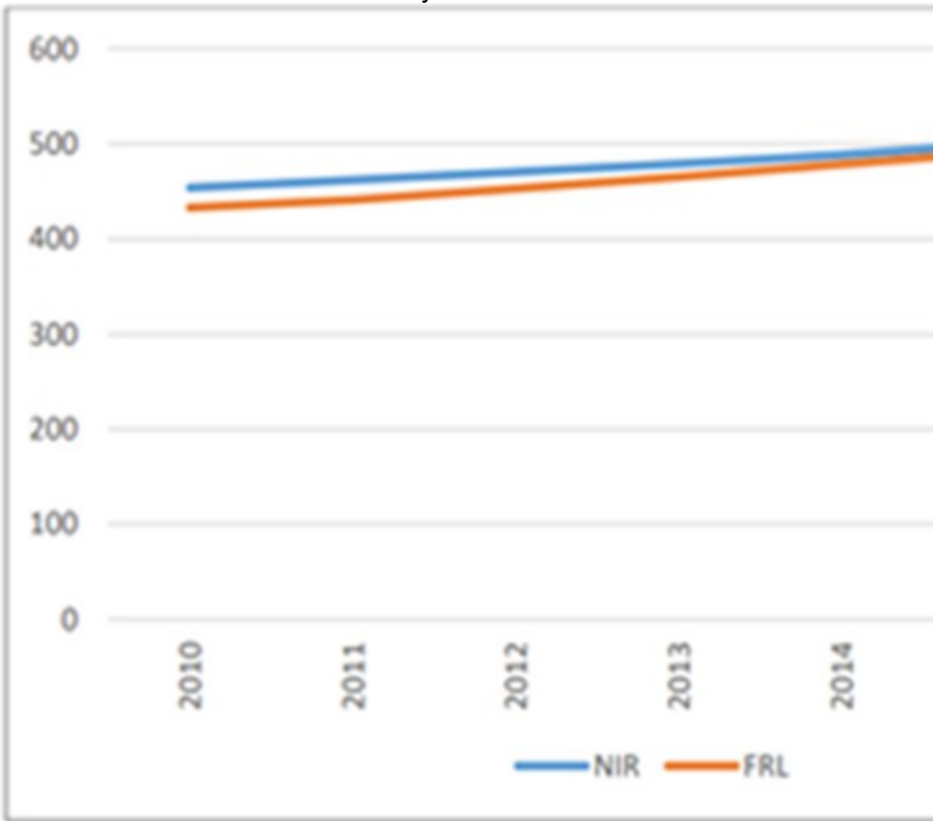
Risk Rating	Low Risk
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Italy Emilia-Romagna	Indicator
3.2.1	All feedstock sourcing shall be consistent with either of these two options: Option A. Feedstock may be sourced from Supply Bases where an assessment of the Supply Base shows that the forest 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	Scientific studies about the matter: https://www.crea.gov.it/-/ambiente-foreste-per-il-clima-dati-nuovo-inventario-nazionale-forestale-e-dei-serbatoi-di-carbonio-carabinieri-all4climate-milano-29-30-settembre http://www.biologia.uniba.it/scuola/PhD_programs/publication/pdf/mairota/5.pdf https://www.lanuovaecologia.it/foreste-certificazioni-gestione-sostenibile/
Risk Rating justification	Several studies provide clear evidence that there is a constant increase of forest surface and carbon stock in all Regions in Italy. For instance the governative research centre CREA in 2021 (first mentioned below) assessed that in 15 years from 2005 to 2020, the carbon stock increased by 15% at least and trends are currently similar. Option A is the ordinary applicable option for forests in Italy; Option B applies to few cases where natural processes occurred and the cutting aims to speed recover or prepare for re-forestation, under a detailed authorization issued by competent authority. This does not apply to TOF Group 2A, 3A.
Risk Rating	Low Risk

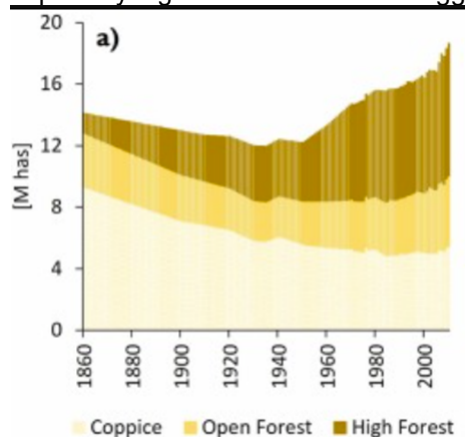
Italy Tuscany	Indicator
3.2.1	All feedstock sourcing shall be consistent with either of these two options: Option A. Feedstock may be sourced from Supply Bases where an assessment of the Supply Base shows that the forest carbon stocks are stable or increasing, or Option B. Feedstock may be sourced, if 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	Scientific studies about the matter: https://www.crea.gov.it/-/ambiente-foreste-per-il-clima-dati-nuovoinventarionazionale-forestale-e-dei-serbatoi-di-carbonio-carabinieriall4climate-

	milano-29-30-settembre http://www.biologia.uniba.it/scuola/PhD_programs/publication/pdf/mairota/5.pdf https://www.lanuovaecologia.it/foreste-certificazioni-gestione-sostenibile/
Risk Rating justification	Several studies provide clear evidence that there is a constant increase of forest surface and carbon stock in all Regions in Italy. For instance the governative research centre CREA in 2021 (first mentioned below) assessed that in 15 years from 2005 to 2020, the carbon stock increased by 15% at least and trends are currently similar. Option A is the ordinary applicable option for forests in Italy; Option B applies to few cases where natural processes occurred and the cutting aims to speed recover or prepare for re-forestation, under a detailed authorization issued by competent authority. This does not apply to TOF Group 2A, 3A.
Risk Rating	Low Risk

Spain 6 regions in East and South Spain	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	Inventario Nacional de Gases de Efecto Invernadero: https://www.miteco.gob.es/es/calidad-y-evaluacionambiental/temas/sistema-espanol-de-inventario-sei-/Inventario-GEI.aspx Inventario Forestal Nacional: https://www.mapa.gob.es/es/desarrollorural/temas/politica-forestal/inventario-cartografia/inventario-forestalnacional/default.aspx and Scientific studies about the matter: National forest inventory plan of Spain for 2021-2025 https://www.miteco.gob.es/es/cambio-climatico/temas/mitigacion-politicasymedidas/nfap_es_tcm30-485874.pdf Global forestry watch: https://www.globalforestwatch.org/dashboards/country/ESP?category=climate Data of reforestation in Spain: https://www.iberianature.com/geography/forests-in-spain/ Study “Assessment of the soil organic carbon stock in Spain”: https://www.sciencedirect.com/science/article/pii/S001670611530104X Ministry of ecological transition https://www.miteco.gob.es/es/cambioclimatico/

	temas/mecanismos-de-flexibilidad-y-sumideros/sumideros-decarbono/ Spanish system of emissions inventory https://www.miteco.gob.es/es/calidad-y-evaluacionambiental/temas/sistema-espanol-de-inventario-sei/ CREAF (Ecological and forestry Research Centre of Catalonia): http://www.creaf.cat/ CREAF. Los suelos forestales españoles acumulan tanto carbono como el que su población emite en 29 años. http://blog.creaf.cat/es/noticias/los-suelos-forestales-espanolesacumulantanto-carbono-como-el-que-su-poblacion-emite-en-29-anos/ Foro de bosques y cambio climático. Gestión forestal y absorción de CO2: http://www.fbycc.org/index.php/gestion_forestal_y_absorcion_co2/
Risk Rating justification	Inventories and studies show the constant increase of forest surface and carbon stock in all Spain In the following graph we can see how in the managed forests, the carbon stock tends to increase continuously:  <i>Ilustración 3 – Stock de biomasa en tierras forestales gestiona</i> NIR: National Inventory of Greenhouse Gases / FRL: forest reference level Source: Plan de Contabilidad forestal nacional. Ministerio para la transición ecológica. Diciembre 2018 The following figure shows how forests have increased since 1860,

especially high forest that are the biggest sink of carbon stock:



Regarding a single plot or stand Duferco and its suppliers will never decrease the levels of carbon stock since:

- Duferco and its suppliers only perform thinnings or cuts in eucalyptus stands under criteria of sustainable forest management;
- no forestry works are carried out at degraded areas or with low levels of carbon stock;
- no biomass is sourced from land use changes;
- no forestry works are carried out in primary forests.

This does not apply to TOF Group 3A.

Risk Rating	Low Risk
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Spain 6 regions in East and South Spain	Indicator
3.2.2	Primary feedstock shall not be sourced from forest areas where site productivity is low and, according to local definitions or norms, the areas are classified as low-productive or difficult to regenerate.
Supply Base Verifiers	Felling licences Forest Management Plans
Risk Rating justification	Duferco doesn't source biomass from low productivity sites due to economical reason (income from woodchips is generally low, it is not applicable to source them unless productivity is medium or high). Duferco as economic operator only buys timber or standing trees if there is revenue of some kind. This does not apply to TOF Group 3A.
Risk Rating	Low Risk

Italy Tuscany	Indicator
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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	Not applicable (biomass not sourced from these sites).
Risk Rating justification	Biomass is not sourced from low productivity sites due to economical reason (income from woodchips is generally low, it is not applicable to source them unless productivity is medium or high). This does not apply to TOF Group 2A, 3A.
Risk Rating	Low Risk

Italy Apulia	Indicator
3.2.2	Primary feedstock shall not be sourced from forest areas where site productivity is low and, according to local definitions or norms, the areas are classified as low-productive or difficult to regenerate.
Supply Base Verifiers	Not applicable
Risk Rating justification	Not applicable for TOF.
Risk Rating	Low Risk

Italy Lazio	Indicator
3.2.2	Primary feedstock shall not be sourced from forest areas where site productivity is low and, according to local definitions or norms, the areas are classified as low-productive or difficult to regenerate.
Supply Base Verifiers	Not applicable (biomass not sourced from these sites).
Risk Rating justification	Biomass is not sourced from low productivity sites due to economical reason (income from woodchips is generally low, it is not applicable to source them unless productivity is medium or high). This does not apply to TOF Group 2A, 3A.
Risk Rating	Low Risk

Italy Emilia-Romagna	Indicator
3.2.2	Primary feedstock shall not be sourced from forest areas where site productivity is low and, according to local definitions or norms, the areas are classified as low-productive or difficult to regenerate.
Supply Base Verifiers	Biomass is not sourced from low productivity sites due to economical reason (income from woodchips is generally low, it is not applicable to source them unless productivity is medium or high).
Risk Rating justification	Biomass is not sourced from low productivity sites due to economical reason

	(income from woodchips is generally low, it is not applicable to source them unless productivity is medium or high). This does not apply to TOF Group 2A, 3A. Not applicable (biomass not sourced from these sites).
Risk Rating	Low Risk

Italy Lombardy	Indicator
3.2.2	Primary feedstock shall not be sourced from forest areas where site productivity is low and, according to local definitions or norms, the areas are classified as low-productive or difficult to regenerate.
Supply Base Verifiers	Not applicable (biomass not sourced from these sites).
Risk Rating justification	Biomass is not sourced from low productivity sites due to economical reason (income from woodchips is generally low, it is not applicable to source them unless productivity is medium or high). This does not apply to TOF Group 2A, 3A.
Risk Rating	Low Risk

Italy Veneto	Indicator
3.2.2	Primary feedstock shall not be sourced from forest areas where site productivity is low and, according to local definitions or norms, the areas are classified as low-productive or difficult to regenerate.
Supply Base Verifiers	Not applicable (biomass not sourced from these sites).
Risk Rating justification	Biomass is not sourced from low productivity sites due to economical reason (income from woodchips is generally low, it is not applicable to source them unless productivity is medium or high). This does not apply to TOF Group 2A, 3A.
Risk Rating	Low Risk

Italy Emilia-Romagna	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	GRAS Database Biodiversity GRAS Database Carbon Stock National (Law n. 394/1991) and regional law enforcement about Protected Areas.

Risk Rating justification	As no map or database at the moment is available for matching the 2 criteria as layers, this indicator must be checked for each sourcing area browsing existing single criterion maps and matching them. This does not apply to TOF Group 2A, 3A.
Risk Rating	Specified Risk

Italy Lazio	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	GRAS Database Biodiversity GRAS Database Carbon Stock Regional geoportal National (Law n. 394/1991) and regional law enforcement about Protected Areas
Risk Rating justification	As no map or database at the moment is available for matching the 2 criteria as layers, this indicator must be checked for each sourcing area browsing existing single criterion maps and matching them. This does not apply to TOF Group 2A, 3A.
Risk Rating	Specified Risk

Italy Apulia	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	Not applicable.
Risk Rating justification	Not applicable for TOF.
Risk Rating	Low Risk

Italy Tuscany	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	GRAS Database Biodiversity GRAS Database Carbon Stock Regional geoportal National (Law n. 394/1991) and regional law enforcement about Protected Areas (Regional law n. 30/2015, Resolution of the regional council n. 13/2022).

Risk Rating justification	There is no map or database available that matches the 2 criterion, it is then necessary to do it lot by lot using existing separate maps and matching them. This does not apply to TOF Group 2A, 3A.
Risk Rating	Specified Risk

Spain 6 regions in East and South Spain	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	GRAS Database Biodiversity GRAS Database Carbon Stock Other geoportal/public databases Law 42/2007, of December 13, on Natural Heritage and Biodiversity. https://www.boe.es/buscar/act.php?id=BOE-A-2007-21490 Maps catalogue: https://www.mapama.gob.es/ide/metadatos/ Natura 2000 Network http://www.magrama.gob.es/es/biodiversidad/temas/espaciosprotegidos/red-natura-2000/default.aspx https://ic.fsc.org/file-download.common-guidance-for-the-identificationofhcv.a-295.pdf Study "Historical changes in biomass carbon stocks in the Mediterranean (Spain, 1860–2010)" by Juan Infante-Amate, Iñaki Iriarte-Goñi. https://www.sciencedirect.com/science/article/pii/S2213305423000498
Risk Rating justification	There is no map or database available that matches the 2 criterion, it is then necessary to do it lot by lot using existing separate maps and matching them. This does not apply to TOF Group 3A.
Risk Rating	Specified Risk

Italy Veneto	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	GRAS Database Biodiversity GRAS Database Carbon Stock National (Law n. 394/1991) and regional law enforcement about Protected Areas Regional law n. 30/2015: https://bur.regione.veneto.it/BurvServices/Pubblica/DettaglioDcr.aspx?id=29

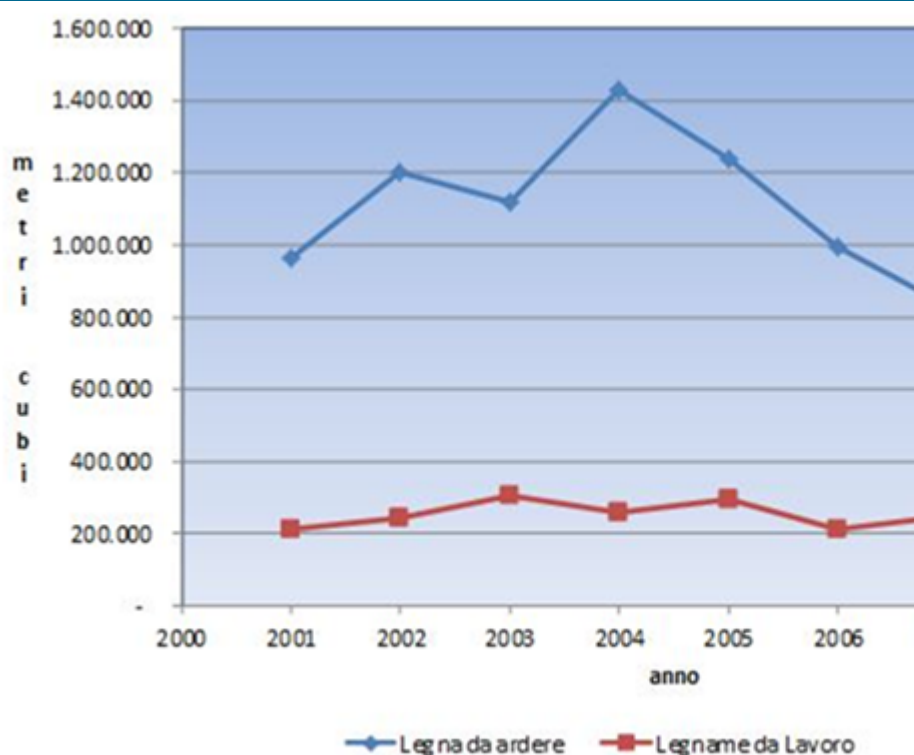
	9234 National official list of protected areas: https://www.mase.gov.it/sites/default/files/archivio/normativa/dm_27_04_2010.pdf
Risk Rating justification	There is no map or database available that matches the 2 criterion, it is then necessary to do it lot by lot using existing separate maps and matching them. This does not apply to TOF Group 2A, 3A.
Risk Rating	Specified Risk

Italy Lombardy	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	GRAS Database Biodiversity GRAS Database Carbon Stock Regional law no. 31/2008 https://normelombardia.consiglio.regione.lombardia.it/normelombardia/Accessibile/main.aspx?view=showpart&idparte=lr002008033100010ar0012a
Risk Rating justification	As no map or database at the moment is available for matching the 2 criterions as layers, this indicator must be checked for each sourcing area browsing existing single criterion maps and matching them. This does not apply to TOF Group 2A, 3A. About Old Growth Forest ("Boschi vetusti"), in which there is of course HCV and high carbon stock, In Lombardy there is a regional law about their protection (R.L. 10/2008) but no official list of old growth forest within the Region has been approved.
Risk Rating	Specified Risk

Spain 6 regions in East and South Spain	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	Market demand for high value stem by sawmills Ministry data: https://www.miteco.gob.es/content/dam/miteco/es/biodiversidad/temas/internacional-especies-madera/informemercadoesp_tcm30-512654.pdf
Risk Rating justification	According to Ministry sources in 2016, roundwood production in Spain reached 17.8 million m3; this figure represents around 40% of the total

	annual growth (approx. 52 million m3) and demonstrates that there is no risk of overexploitation. The two uses (roundwood and woodchips) are not alternative, but can coexist, since only some parts of the best roundwood can be used for longlived wood products, all the rest can only be used for biomass (split trunks, defected trunks, branches, small trees), up to 60% of the annual growth. This does not apply to TOF Group 3A.
Risk Rating	Low Risk

Italy Tuscany	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	Agrarian Sciences website: BOSCHI, SELVICOLTURA E PRODUZIONI FORESTALI IN ITALIA: https://www.agrariansciences.it/2022/07/boschi-selvicoltura-e-produzioni.html University of Florence reports: https://www.aisf.it/wp-content/uploads/2016/02/631-637-corona.pdf https://flore.unifi.it/retrieve/e398c378-b2c0-179a-e053-3705fe0a4cff/Rapportostatoforestetoscana08%20%281%29.pdf
Risk Rating justification	In Italy the forestry sector counts 320.000 operators with 77.000 companies. Furniture production has a huge positive balance in Italy, counting 15% of all national companies; it is the second sector in Italy for the manufacturing industry. In 2017, the first processing sector registered a little bit more of 25.000 companies. The poplar plantations are fundamental in producing the 40% of the long-lived wood products while the short rotation forestry plantations, covering almost 10.000-12.000 ha of the Italian surface, are destined to biomass production. At national level timber constitutes one third of the wood material harvested. In the case of Tuscany, firewood is the main destination for harvested wood products (about 80%) and it mainly comes from the coppice woods. Firewood is mainly produced by oak forests while timber may come from beech, fir or chestnut forests.



Square metres of firewood (blue line) and timber (red line) in Tuscany from 2001 to 2011. Source: Risorse forestali della Toscana e aspetti riguardanti il mercato del legno locale | Agriregionieuropa (univpm.it).

The two uses are not alternative, but can coexist, since only some parts of the best trunks can be used for long-lived wood products, all the rest can only be used for biomass (split trunks, defected trunks, roots, branches, small plants).

Wood industry in Italy is very important, that means first quality timber is always taken for long-lived products such as furniture and beams.

This does not apply to TOF Group 2A, 3A.

Risk Rating	Low Risk
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Italy Apulia	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	Regional Law no. 8/2024 Market demand
Risk Rating justification	

	Until 2023 the use of olive wood for biomass was prevalent and only few trunks were bought by artisans to craft traditional objects (for instance sculptures, but also chopping boards and bowls), with no regulation whatsoever, only market rules. Since early this year, due to the application of Regional Law no. 8/2024, there is the legal framework to supply a local chain of trademark artisanal creations from olive wood, that has always been traditionally used for creating object of art and daily use. The two uses are not alternative, but can coexist, since only some parts of the bigger trunks can be used for crafting, all the rest can only be used for biomass (split trunks, defected trunks, roots, branches, small plants). Besides, the number of crafters is limited and the availability of timber enormous at the moment, meaning that each crafter may now store olive timber for his entire career and still not influence the market.
Risk Rating	Low Risk

Italy Lazio	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	Regional Register of Biomass power plants: https://www.regione.lazio.it/cittadini/tutela-ambientale-difesa-suolo/registroimpianti-biomasse Data about forest in Italy 2022: https://www.agrariansciences.it/2022/07/boschi-selvicoltura-e-produzioni.html Study about timber sourcing: https://www.aisf.it/wp-content/uploads/2016/02/631-637-corona.pdf
Risk Rating justification	In Italy the forestry sector counts 320.000 operators with 77.000 companies. Furniture production has a huge positive balance in Italy, counting 15% of all national companies; it is the second sector in Italy for the manufacturing industry. In 2017, the first processing sector registered a little bit more of 25.000 companies. (Agrarian Sciences: BOSCHI, SELVICOLTURA E PRODUZIONI FORESTALI IN ITALIA) The poplar plantations are fundamental in producing the 40% of the long-lived wood products while the short rotation forestry plantations, covering almost 10.000-12.000 ha of the Italian surface, are destined to biomass production. At national level timber constitutes one third of the wood material harvested. (631-637-corona.pdf (aisf.it)) In the case of Lazio, firewood is the main destination for harvested wood products as well as for the rest of Italian regions. However, the biomass production is growing as proved by the institution of the Regional Register of Biomass Power Plants (Regione Lazio CITTADINI-TUTELA AMBIENTALE E DIFESA DEL SUOLO-R.I.B. REGISTRO IMPIANTI BIOMASSE.

	The uses can coexist, since only some parts of the best trunks can be used for long-lived wood products, all the rest can only be used for biomass (split trunks, defected trunks, roots, branches, small plants). Wood industry in Italy is very important, that means first quality timber is always taken for long-lived products such as furniture and beams. This does not apply to TOF Group 2A, 3A.
Risk Rating	Low Risk

Italy Emilia-Romagna	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	Giornata internazionale delle foreste: https://ambiente.regione.emilia-romagna.it/it/notizie/attualita/2025/marzo/il-21-marzo-e-la-giornata-internazionale-delle-foreste Piano forestale regionale: https://ambiente.regione.emilia-romagna.it/it/parchi-natura2000/foreste/pianificazione-forestale/piano-forestale-regionale Interventi forestali: https://ambiente.regione.emilia-romagna.it/it/parchi-natura2000/foreste/le-foreste-delle-emilia-romagna/inteventi-forestali
Risk Rating justification	In Emilia-Romagna, firewood (legna da ardere) is the main destination for harvested wood products, primarily coming from coppice woods (cedui). According to the most recent regional data (2025), coppices extend over approximately 350,000 hectares, representing the dominant forest management type, compared to approximately 108,000 hectares of high forests (fustaie) and just over 6,000 hectares of tree plantations. Firewood production mainly comes from: - Oak forests (<i>Quercus</i> species: cerro, roverella) one of the most common species - Chestnut forests (<i>Castanea sativa</i>) - Mixed deciduous forests in hill and mountain areas (<i>carpinus</i> and <i>fraxinus</i>) Timber for long-lived wood products may come from: - Beech forests (<i>Fagus sylvatica</i>) Fir forests (<i>Abies alba</i>) - Chestnut forests (for both firewood and timber) - Poplar plantations (<i>Populus</i> spp.) According to regional data, private forests represent approximately 80% of the total forest area and consist mainly of small and fragmented properties subject to periodic cutting for firewood production. Coppice forests are managed with rotation cycles of 20-30 years specifically for firewood production, while high forests follow longer cycles (80-100 years) for timber

	production.
Risk Rating	Low Risk

Italy Lombardy	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	Data about forest in Italy 2022: https://www.agrariansciences.it/2022/07/boschi-selvicoltura-e-produzioni.html Study about timber sourcing: https://www.aisf.it/wp-content/uploads/2016/02/631-637-corona.pdf Federlegno report 2020: https://www.federlegnoarredo.it/ContentsFiles/Regioni2020_LOMBARDIA.pdf
Risk Rating justification	In Italy the forestry sector counts 320.000 operators with 77.000 companies. Furniture production has a huge positive balance in Italy, counting 15% of all national companies; it is the second sector in Italy for the manufacturing industry. In 2017, the first processing sector registered a little bit more of 25.000 companies. (Agrarian Sciences: BOSCHI, SELVICOLTURA E PRODUZIONI FORESTALI IN ITALIA) The poplar plantations are fundamental in producing the 40% of the long-lived wood products while the short rotation forestry plantations, covering almost 10.000-12.000 ha of the Italian surface, are destined to biomass production. At national level timber constitutes one third of the wood material harvested. (631-637-corona.pdf (aisf.it)). The corporate Federlegno in 2020 published a report about the wood industry: in Lombardy there are over 9500 enterprises/industries employing over 53000 people, and export of furniture products is worth over 2.5 billion euros. In this scenario first and second quality timber that is sourced within the Region is sold to these industries, to fill at least part of the demand (othe quality timber is obviously imported to cover the production needs). This does not apply to TOF Group 2A, 3A.
Risk Rating	Low Risk

Italy Veneto	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	Study by the Economic Observatory LIMEN (2021): https://www.tb.camcom.gov.it/uploads/SST/_OsservatorioEconomico/LIMEN-

	1-report-compartolegnonelveeto-2021.pdf "Rapporto sullo stato delle foreste e del settore forestale in Veneto 2020" (report about forest situation and forestry sector 2020) https://www.venetoagricoltura.org/wp-content/uploads/2021/07/Raf-Veneto-web.pdf Regional Wood stock exchange: https://www.portalelegnoveneto.it/
Risk Rating justification	In Italy the forestry sector counts 320.000 operators with 77.000 companies. Furniture production has a huge positive balance in Italy, counting 15% of all national companies; it is the second sector in Italy for the manufacturing industry. In 2017, the first processing sector registered a little bit more of 25.000 companies. (Agrarian Sciences: BOSCHI, SELVICOLTURA E PRODUZIONI FORESTALI IN ITALIA) The poplar plantations are fundamental in producing the 40% of the long-lived wood products while the short rotation forestry plantations, covering almost 10.000-12.000 ha of the Italian surface, are destined to biomass production. At national level timber constitutes one third of the wood material harvested. (631-637-corona.pdf (aisf.it)) Historical importance is related to forests in Veneto, because in the Alpine Region spruce and fir were traditionally protected or even planted over huge surfaces to provide timber to the furniture industry that is in this Region of utmost importance, like nowhere else in Italy (see indicator 4.2.2 for data). There are over 3300 companies manufacturing wood products and over 4600 companies manufacturing furniture. There is a Regional Wood stock exchange ("Portale Legno Veneto") that regulates public auctions of quality timber all over Veneto. Therefore, all possible quality timber sourced within the Region goes for these industries, as it is indeed necessary to cover at least part of the demand. According to the economic observatory Limen report, in ordinary conditions, around 400000 m3 of timber are sourced in Veneto yearly for industry and seven times volume is imported, with higher costs. In this situation, only low-grade stemwood and branches become wood chips for energy purposes. This does not apply to TOF Group 2A, 3A.
Risk Rating	Low Risk

Italy Lombardy	Indicator
4.1.1	Freedom of association and the right to collective bargaining shall be respected in the workplace.
Supply Base Verifiers	ILO Conventions ratified by Italy: https://normlex.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P1120

	0_COUNTRY_ID:102709 Italian Constitution ("Costituzione"), article 35 https://www.senato.it/istituzione/la-costituzione/parte-i/titolo-iii/articolo-35 Ministry of Labour and Social politics website, Section about forced labour: https://www.lavoro.gov.it/notizie/pagine/autorizzata-dal-governo-la-ratifica-protocollo-oil-sul-lavoro-forzato Lombardy Regional Observatory for Integration and Multiethnicity – ORIM, 2021 Working Plan: https://www.regione.lombardia.it/wps/wcm/connect/31f420a2-78fb-4879-b376-20f5dae723ab/ORIM_monografia_rilevazione_campionaria_anno_2020.pdf?MOD=AJPERES&CACHEID=ROOTWORKSPACE-31f420a2-78fb-4879-b376-20f5dae723ab-nFiXZcq Lombardy Regional Observatory for work: https://www.regione.lombardia.it/wps/portal/istituzionale/HP/DettaglioServizi/servizi-e-informazioni/cittadini/lavoro-e-formazione-professionale/quadrante-del-lavoro/quadrante-del-lavoro Data about labour rights (from CGIL union): https://www.cgil.it/ufficio-stampa/lavoro-97-lavoratori-tutelato-da-ccnl-sottoscritti-da-cgil-cisl-uil-ricerca-della-fondazione-di-vittorio-vsu8i7ka Press release https://www.today.it/economia/lavoro-nero-regioni.html Duferco Biomasse voluntary certifications.
Risk Rating justification	Article 35 of the Italian Constitution is about labour right and protection of workers. Italy ratified in 1934 the ILO convention C029 - Forced Labour Convention, 1930 (No. 29). Italy ratified in 1968 the ILO convention C105 - Abolition of Forced Labour Convention, 1957 (No. 105) The last Protocol about ILO convention C029 has been ratified in 2023 by the Italian Government; this protocol contains also measures about prevention of forced labour and protection of victims, as well as information and education about this matter. Italians have well clear in mind the labour rights, as 97% of the employees are under unions. The concerns are more specific about immigrant workers, that are an important part of the working population in Lombardy. Lombardy Region has got 2 observatories that collect data and ensure legal policies about immigration and work, but still some illegal employment may be present, even if the phenomenon is the last in Italy for percentage,

	according to a press release by Today.it. Lombardy, despite having over 504,000 irregular workers, is the region least affected by this sad phenomenon: the irregularity rate is 10.4 percent, while the share of added value generated by irregular work in the regional total is 3.6 percent—the lowest rate in the country. This illegal work is mainly performed by housekeepers, elderly caregivers, babysitters who work a few hours a week to have a small income. It may be present in agriculture, in seasonal works, but data about agriculture cannot be compared to data in forestry works, because in agriculture the problem is entirely related to seasonal works of fruit picking in the summer/autumn, that requires no training and it is not under the radar of public opinion. In forestry works a proper training and insurances are required for all workers and the sector is subject to several controls in the field by competent authorities, as it is considered amongst the dangerous jobs; besides, a further control is assured by public opinion, as nowhere in Italy it is possible to perform forestry operations without being reported on social media and cross-checked for authorizations and permits that involve rural policy. Duferco Biomasse is ISO 45001 certified. It is not possible, though, to exclude that forced or compulsory labour is present at the level of suppliers.
Risk Rating	Low Risk

Italy Veneto	Indicator
4.1.1	Freedom of association and the right to collective bargaining shall be respected in the workplace.
Supply Base Verifiers	ILO Conventions https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO:: Italian Constitution (“Costituzione”) Ministry of Labour and Social politics website https://www.lavoro.gov.it/sportello-unico-digitale/norme-materiadirappresentanzadel-personale/informazioni-sulla Duferco Biomasse voluntary certifications National collective bargaining for agricultural works: https://www.flai.it/contratti/ccnl/ccnl-operai-agricoli-e-florovivaisti/
Risk Rating justification	In 1920 the ILO established an office in Rome, one of the first four cities to have an ILO office along with London, Paris and Washington. Italy ratified in 1958 the ILO convention C098 - Right to Organise and Collective Bargaining Convention, 1949 (No. 98). Italy ratified also in 1958 the ILO Convention C087 - Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87) and C141 - Rural Workers' Organisations Convention, 1975 (No. 141). As an overall view, Italy has ratified 116 ILO Conventions and 1 protocol. Italian Constitution (1947) at article 1 states that Italy is a republic founded on

	labour, then at articles 18 and 39 state the freedom of association and the trade union existence as a recognized form of association. Ministry of Labour and Social Politics provides detailed information about labour rights and collective bargaining. The National Council for Economy and Labour (CNEL) supervises and provides a list of applicable collective contracts (called shortly “CCNL”) in the link: https://www.cnel.it/Archivio-Contratti-Collettivi/Archivio-Nazionaledeicontratti-e-degli-accordi-collettivi-di-lavoro The Italian labour legislation covers both Italian citizens and legal foreign workers, who have a valid immigrant visa. There is a binding rule to provide evidence of respecting laws and regulations through a document called “DURC”, that states the farmer has paid all due taxes and contributions for all workers and has never used illegal or controversial workers. After that Duferco obliges its suppliers to provide evidence of respecting labour rights in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Duferco is also FSC certified and provides evidence annually to the CB about full respect of ILO Conventions. The collective bargaining in agriculture (“Contratto Collettivo Nazionale per gli Operai Agricoli 2022-2025”) covers also freedom of association clauses. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A.
Risk Rating	Low Risk

Spain 6 regions in East and South Spain	Indicator
4.1.1	Freedom of association and the right to collective bargaining shall be respected in the workplace.
Supply Base Verifiers	ILO Conventions https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO Spanish Constitution Workers’ Statute of Spain: Real Decreto-ley 17/1977, de 4 de marzo, sobre relaciones de trabajo National law enforcement: Real Decreto Legislativo 2/2015, de 23 de octubre, por el que se aprueba el texto refundido de la Ley del Estatuto de los Trabajadores Ley Orgánica 11/1985, de 2 de agosto, de Libertad Sindical. Duferco Biomasse voluntary certifications.
Risk Rating justification	Labour rights are adequately protected in Spain, including those specified in the ILO’s fundamental principles. Spain has ratified the ILO’s eight Fundamental Conventions. One of the fundamental legal principles that underpins the current system of labour relations in Spain is the one

	contained in section 1, article 28 of the Spanish Constitution, which recognises freedom of association as being a fundamental right for all people to freely form trade unions. Article 37 of the Constitution, together with articles 35 and 38, covers the constitutional framework of labour relations. Pursuant to that precept, the law must guarantee the right to collective labour bargaining and the binding force of conventions, in addition to recognising the rights of workers and businesspeople to take industrial action. The law that regulates the exercise of that right, without prejudice to the limitation that may be set, includes the guarantees needed to ensure the functioning of the community's essential services. There is also a National Plan to fight illegal employment and Social Security fraud. Labour inspectors form the Government appointed authority check labour and safety rights. After that Duferco obliges its suppliers to provide evidence of respecting labour rights in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Duferco is also FSC certified and provides evidence annually to the CB about full respect of ILO Conventions. This applies to forest lots and also to operations in the agricultural land related to sourcing feedstock within TOF Group 3A.
Risk Rating	Low Risk

Italy Lazio	Indicator
4.1.1	Freedom of association and the right to collective bargaining shall be respected in the workplace.
Supply Base Verifiers	ILO Conventions https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO:: Italian Constitution ("Costituzione") Ministry of Labour and Social politics website https://www.lavoro.gov.it/sportello-unico-digitale/norme-materiadirappresentanzadel-personale/informazioni-sulla Duferco Biomasse voluntary certifications National collective bargaining for agricultural works: https://www.flai.it/contratti/ccnl/ccnl-operai-agricoli-e-florovivaisti/
Risk Rating justification	In 1920 the ILO established an office in Rome, one of the first four cities to have an ILO office along with London, Paris and Washington. Italy ratified in 1958 the ILO convention C098 - Right to Organise and Collective Bargaining Convention, 1949 (No. 98). Italy ratified also in 1958 the ILO Convention C087 - Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87) and C141 - Rural Workers' Organisations Convention, 1975 (No. 141). As an overall view, Italy has ratified 116 ILO Conventions and 1 protocol. Italian Constitution (1947) at article 1 states that Italy is a republic founded on

	labour, then at articles 18 and 39 state the freedom of association and the trade union existence as a recognized form of association. Ministry of Labour and Social Politics provides detailed information about labour rights and collective bargaining. The National Council for Economy and Labour (CNEL) supervises and provides a list of applicable collective contracts (called shortly “CCNL”) in the link: https://www.cnel.it/Archivio-Contratti-Collettivi/Archivio-Nazionaledeicontratti-e-degli-accordi-collettivi-di-lavoro The Italian labour legislation covers both Italian citizens and legal foreign workers, who have a valid immigrant visa. There is a binding rule to provide evidence of respecting laws and regulations through a document called “DURC”, that states the farmer has paid all due taxes and contributions for all workers and has never used illegal or controversial workers. After that Duferco obliges its suppliers to provide evidence of respecting labour rights in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Duferco is also FSC certified and provides evidence annually to the CB about full respect of ILO Conventions. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A. The collective bargaining in agriculture (“Contratto Collettivo Nazionale per gli Operai Agricoli 2022-2025”) covers also freedom of association clauses.
Risk Rating	Low Risk

Italy Emilia-Romagna	Indicator
4.1.1	Freedom of association and the right to collective bargaining shall be respected in the workplace.
Supply Base Verifiers	ILO Conventions https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO:: Italian Constitution (“Costituzione”) Ministry of Labour and Social politics website https://www.lavoro.gov.it/sportello-unico-digitale/norme-materiadirappresentanzadel-personale/informazioni-sulla-Duferco-Biomasse-voluntary-certificatio
Risk Rating justification	In 1920 the ILO established an office in Rome, one of the first four cities to have an ILO office along with London, Paris and Washington. Italy ratified in 1958 the ILO convention C098 - Right to Organise and Collective Bargaining Convention, 1949 (No. 98). Italy ratified also in 1958 the ILO Convention C087 - Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87) and C141 - Rural Workers' Organisations Convention, 1975 (No. 141). As an overall view, Italy has ratified 116 ILO Conventions and 1 protocol.

	Italian Constitution (1947) at article 1 states that Italy is a republic founded on labour, then at articles 18 and 39 state the freedom of association and the trade union existence as a recognized form of association. Ministry of Labour and Social Politics provides detailed information about labour rights and collective bargaining. The National Council for Economy and Labour (CNEL) supervises and provides a list of applicable collective contracts (called shortly “CCNL”) in the link: https://www.cnel.it/Archivio-Contratti-Collettivi/Archivio-Nazionaledeicontratti-degli-accordi-collettivi-di-lavoro The Italian labour legislation covers both Italian citizens and legal foreign workers, who have a valid immigrant visa. There is a binding rule to provide evidence of respecting laws and regulations through a document called “DURC”, that states the farmer has paid all due taxes and contributions for all workers and has never used illegal or controversial workers. After that Duferco obliges its suppliers to provide evidence of respecting labour rights in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Duferco is also FSC certified and provides evidence annually to the CB about full respect of ILO Conventions. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A. The collective bargaining in agriculture (“Contratto Collettivo Nazionale per gli Operai Agricoli 2022-2025”) covers also freedom of association clauses
Risk Rating	Low Risk

Italy Tuscany	Indicator
4.1.1	Freedom of association and the right to collective bargaining shall be respected in the workplace.
Supply Base Verifiers	ILO Conventions https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO:: Italian Constitution (“Costituzione”) Ministry of Labour and Social politics website https://www.lavoro.gov.it/sportello-unico-digitale/norme-materiadirappresentanzadel-personale/informazioni-sulla Duferco Biomasse voluntary certifications National collective bargaining for agricultural works: https://www.flai.it/contratti/ccnl/ccnl-operai-agricoli-e-florovivaisti/
Risk Rating justification	In 1920 the ILO established an office in Rome, one of the first four cities to have an ILO office along with London, Paris and Washington. Italy ratified in 1958 the ILO convention C098 - Right to Organise and Collective Bargaining Convention, 1949 (No. 98). Italy ratified also in 1958 the ILO Convention C087 - Freedom of Association

	and Protection of the Right to Organise Convention, 1948 (No. 87) and C141 - Rural Workers' Organisations Convention, 1975 (No. 141). As an overall view, Italy has ratified 116 ILO Conventions and 1 protocol. Italian Constitution (1947) at article 1 states that Italy is a republic founded on labour, then at articles 18 and 39 state the freedom of association and the trade union existence as a recognized form of association. Ministry of Labour and Social Politics provides detailed information about labour rights and collective bargaining. The National Council for Economy and Labour (CNEL) supervises and provides a list of applicable collective contracts (called shortly "CCNL") in the link: https://www.cnel.it/Archivio-Contratti-Collettivi/Archivio-NazionaledeiContratti-e-degli-accordi-collettivi-di-lavoro The Italian labour legislation covers both Italian citizens and legal foreign workers, who have a valid immigrant visa. There is a binding rule to provide evidence of respecting laws and regulations through a document called "DURC", that states the farmer has paid all due taxes and contributions for all workers and has never used illegal or controversial workers. After that Duferco obliges its suppliers to provide evidence of respecting labour rights in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Duferco is also FSC certified and provides evidence annually to the CB about full respect of ILO Conventions. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A. The collective bargaining in agriculture ("Contratto Collettivo Nazionale per gli Operai Agricoli 2022-2025") covers also freedom of association clauses.
Risk Rating	Low Risk

Italy Apulia	Indicator
4.1.1	Freedom of association and the right to collective bargaining shall be respected in the workplace.
Supply Base Verifiers	- ILO Conventions https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO:: -Italian Constitution ("Costituzione") -Ministry of Labour and Social politics website https://www.lavoro.gov.it/sportello-unico-digitale/norme-materia-di-rappresentanza-del-personale/informazioni-sulla -Duferco Biomasse voluntary certifications
Risk Rating justification	In 1920 the ILO established an office in Rome, one of the first four cities to have an ILO office along with London, Paris and Washington.

	Italy ratified in 1958 the ILO convention C098 - Right to Organise and Collective Bargaining Convention, 1949 (No. 98). Italy ratified also in 1958 the ILO Convention C087 - Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87) and C141 - Rural Workers' Organisations Convention, 1975 (No. 141). As an overall view, Italy has ratified 116 ILO Conventions and 1 protocol. Italian Constitution (1947) at article 1 states that Italy is a republic founded on labour, then at articles 18 and 39 state the freedom of association and the trade union existence as a recognized form of association. Ministry of Labour and Social Politics provides detailed information about labour rights and collective bargaining. The National Concil for Economy and Labour (CNEL) supervises and provides a list of applicable collective contracts (called shortly "CCNL") in the link: https://www.cnel.it/Archivio-Contratti-Collettivi/Archivio-Nazionale-dei-contratti-e-degli-accordi-collettivi-di-lavoro The Italian labour legislation covers both Italian citizens and legal foreign workers, who have a valid immigrant visa. Illegal immigrants in agricultural works may be an issue in this matter in Apulia Region, but as long as grants are given to replant olive trees, there is a binding rule to provide evidence of respecting laws and regulations through a document called "DURC", that states the farmer has paid all due taxes and contributions for all workers and has never used illegal or controversial workers. After that Duferco obliges its suppliers to provide evidence of respecting labour rights in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Duferco is also FSC certified and provides evidence annually to the CB about full respect of ILO Conventions
Risk Rating	Low Risk

Italy Apulia	Indicator
4.1.2	Forced or compulsory labour shall not be used.
Supply Base Verifiers	-ILO Conventions https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO:: -Italian Constitution ("Costituzione") -Ministry of Labour and Social politics website https://www.lavoro.gov.it/notizie/pagine/autorizzata-dal-governo-la-ratifica-protocollo-oil-sul-lavoro-forzato -Duferco Biomasse voluntary certifications

Risk Rating justification	Italy ratified in 1934 the ILO convention C029 - Forced Labour Convention, 1930 (No. 29). Italy ratified in 1968 the ILO convention C105 - Abolition of Forced Labour Convention, 1957 (No. 105). The last Protocol about ILO convention C029 has been ratified in 2023 by the Italian Government; this protocol contains also measures about prevention of forced labour and protection of victims, as well as information and education about this matter. Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions; as Duferco is also ISO 45001 certified, once a year it is audited against that standard about Occupational Health and Safety Management System and the certification has always been maintained since it was first granted. Forced labour can be intended also as illegal employment and this problem may affect the agricultural works employment.
Risk Rating	Specified Risk

Italy Tuscany	Indicator
4.1.2	Forced or compulsory labour shall not be used.
Supply Base Verifiers	ILO Conventions https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO:: Italian Constitution ("Costituzione") Ministry of Labour and Social politics website https://www.lavoro.gov.it/notizie/pagine/autorizzata-dal-governo-laratificaprotocollooil-sul-lavoro-forzato Duferco Biomasse voluntary certifications
Risk Rating justification	Italy ratified in 1934 the ILO convention C029 - Forced Labour Convention, 1930 (No. 29). Italy ratified in 1968 the ILO convention C105 - Abolition of Forced Labour Convention, 1957 (No. 105). The last Protocol about ILO convention C029 has been ratified in 2023 by the Italian Government; this protocol contains also measures about prevention of forced labour and protection of victims, as well as information and education about this matter. Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions; as Duferco is also ISO 45001 certified, once a year it is audited against that standard about Occupational Health and Safety Management System and the certification has always been maintained since it was first granted. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A. Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.

Risk Rating	Low Risk
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Italy Emilia-Romagna	Indicator
4.1.2	Forced or compulsory labour shall not be used.
Supply Base Verifiers	ILO Conventions https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO:: Italian Constitution (“Costituzione”) Ministry of Labour and Social politics website https://www.lavoro.gov.it/notizie/pagine/autorizzata-dal-governo-laratificaprotocolloil-sul-lavoro-forzato Duferco Biomasse voluntary certifications
Risk Rating justification	Italy ratified in 1934 the ILO convention C029 - Forced Labour Convention, 1930 (No. 29). Italy ratified in 1968 the ILO convention C105 - Abolition of Forced Labour Convention, 1957 (No. 105). The last Protocol about ILO convention C029 has been ratified in 2023 by the Italian Government; this protocol contains also measures about prevention of forced labour and protection of victims, as well as information and education about this matter. Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions; as Duferco is also ISO 45001 certified, once a year it is audited against that standard about Occupational Health and Safety Management System and the certification has always been maintained since it was first granted. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A. Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Low Risk

Italy Lazio	Indicator
4.1.2	Forced or compulsory labour shall not be used.
Supply Base Verifiers	ILO Conventions https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO:: Italian Constitution (“Costituzione”) Ministry of Labour and Social politics website https://www.lavoro.gov.it/notizie/pagine/autorizzata-dal-governo-laratificaprotocolloil-sul-lavoro-forzato Duferco Biomasse voluntary certifications
Risk Rating justification	Italy ratified in 1934 the ILO convention C029 - Forced Labour Convention,

	1930 (No. 29). Italy ratified in 1968 the ILO convention C105 - Abolition of Forced Labour Convention, 1957 (No. 105). The last Protocol about ILO convention C029 has been ratified in 2023 by the Italian Government; this protocol contains also measures about prevention of forced labour and protection of victims, as well as information and education about this matter. Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions; as Duferco is also ISO 45001 certified, once a year it is audited against that standard about Occupational Health and Safety Management System and the certification has always been maintained since it was first granted. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A. Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Low Risk

Spain 6 regions in East and South Spain	Indicator
4.1.2	Forced or compulsory labour shall not be used.
Supply Base Verifiers	ILO Conventions https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO Spanish Constitution Workers' Statute of Spain: Real Decreto-ley 17/1977, de 4 de marzo, sobre relaciones de trabajo National law enforcement: Real Decreto Legislativo 2/2015, de 23 de octubre, por el que se aprueba el texto refundido de la Ley del Estatuto de los Trabajadores Duferco Biomasse voluntary certifications
Risk Rating justification	Spain was actually one of the first countries to ratify the 1930 Convention on Forced Labour (No. 29), doing so in 1932. It has developed a solid legal and institutional framework to fight human rights violations and illegal employment, especially with the constant adaptation of the relevant repressive provisions of the Criminal Code, through the adoption in 2009 of an initial Integral Plan against human trafficking, and with the specific role played by the labour inspectorate in detecting criminal conditions arising from exploitation at work or human trafficking. Labour exploitation is prohibited by the Penal Code, as well as by immigration law. Under article 311 of the Penal Code, those who impose on workers (by deception or exploitation of vulnerability) such services and working conditions that prejudice social security are punishable by imprisonment from six months to six years and a fine of six to twelve months' salary. Article 312 prohibits the smuggling of labour and the hiring

	of undocumented workers in working conditions below permitted standards. Under article 173 of the Criminal Code, a person who, through the use of his superior position in an employment relationship, inflicts degrading treatment on another by seriously undermining his moral integrity is liable to imprisonment. There is no provision in Spanish law that limits workers to change or leave work. Workers must give prior notice as specified in the collective agreement or as custom requires. The usual period of notice is 15 days. No relevant violations have been found of the laws on forced labour in relation to the forestry sector. Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions; as Duferco is also ISO 45001 certified, once a year it is audited against that standard about Occupational Health and Safety Management System and the certification has always been maintained since it was first granted. This applies to forest lots and also to operations in the agricultural land related to sourcing feedstock within TOF Group 3A.
Risk Rating	Low Risk

Italy Veneto	Indicator
4.1.2	Forced or compulsory labour shall not be used.
Supply Base Verifiers	ILO Conventions https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO:: Italian Constitution ("Costituzione") Ministry of Labour and Social politics website https://www.lavoro.gov.it/notizie/pagine/autorizzata-dal-governo-laratificaprotocollooil-sul-lavoro-forzato Duferco Biomasse voluntary certifications
Risk Rating justification	Italy ratified in 1934 the ILO convention C029 - Forced Labour Convention, 1930 (No. 29). Italy ratified in 1968 the ILO convention C105 - Abolition of Forced Labour Convention, 1957 (No. 105). The last Protocol about ILO convention C029 has been ratified in 2023 by the Italian Government; this protocol contains also measures about prevention of forced labour and protection of victims, as well as information and education about this matter. Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions; as Duferco is also ISO 45001 certified, once a year it is audited against that standard about Occupational Health and Safety Management System and the certification has always been maintained since it was first granted. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A.

	Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Low Risk

Italy Lombardy	Indicator
4.1.2	Forced or compulsory labour shall not be used.
Supply Base Verifiers	ILO Conventions https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO:: Italian Constitution ("Costituzione") Ministry of Labour and Social politics website https://www.lavoro.gov.it/notizie/pagine/autorizzata-dal-governo-laratificaprotocollooil-sul-lavoro-forzato Duferco Biomasse voluntary certifications
Risk Rating justification	Italy ratified in 1934 the ILO convention C029 - Forced Labour Convention, 1930 (No. 29). Italy ratified in 1968 the ILO convention C105 - Abolition of Forced Labour Convention, 1957 (No. 105). The last Protocol about ILO convention C029 has been ratified in 2023 by the Italian Government; this protocol contains also measures about prevention of forced labour and protection of victims, as well as information and education about this matter. Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions; as Duferco is also ISO 45001 certified, once a year it is audited against that standard about Occupational Health and Safety Management System and the certification has always been maintained since it was first granted. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A. Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Low Risk

Spain 6 regions in East and South Spain	Indicator
4.1.3	Child labour shall not be used.
Supply Base Verifiers	ILO Conventions https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO Spanish Constitution Workers' Statute of Spain: Real Decreto-ley 17/1977, de 4 de marzo, sobre

	relaciones de trabajo National law enforcement: Real Decreto Legislativo 2/2015, de 23 de octubre, por el que se aprueba el texto refundido de la Ley del Estatuto de los Trabajadores Duferco Biomasse voluntary certifications
Risk Rating justification	Article 6 about “Child Labour” of the Workers’ Statute of Spain specifies: People aged under 16 shall not enter the world of work. Workers aged under 18 cannot carry out night duties. They must also not carry out any work activities or fill any work posts that are covered by limitations on contracting persons aged under 18, pursuant to the provisions of Law 31 / 1995 of 8 November on Preventing Risks in the Workplace, and in applicable regulations, that establish: -people aged under 18 shall not do overtime; -people aged under 18 shall only take part in public shows in exceptional cases subject to the labour authority, provided that doing so is not injurious to the health, professional development, and human development of those persons. Permission must be given in writing and for specific events.” No relevant violations can be found about child labour in relation to the forestry sector. After that Duferco obliges its suppliers to provide evidence of respecting all labour rights in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions; as Duferco is also ISO 45001 certified, once a year it is audited against that standard about Occupational Health and Safety Management System and the certification has always been maintained since it was first granted.
Risk Rating	Low Risk

Italy Lazio	Indicator
4.1.3	Child labour shall not be used.
Supply Base Verifiers	ILO Conventions https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO:: Ministry of Labour and Social politics webs Ministry of Labour and Social politics website https://www.lavoro.gov.it/Pagine/Cerca-nelsito?search=lavoro+minorile Article: savethechildren.it/blog-notizie/lavoro-minorile-in-italia-un-fenomenodiffusoma-invisibile Duferco Biomasse voluntary certifications
Risk Rating justification	Italy ratified in 1981 the ILO convention C138 - Minimum Age Convention, 1973 (No. 138) and in 2000 the ILO convention C182 – Worst forms of child labour convention, 1999 (No. 182). The ILO Convention C138 establish 15 years as minimum age for working;

	in Italy it is 15, but only after the legal obligation of school attendance of 10 years is achieved, starting at 5 or 6 years old. A recent evaluation by the organisation “Save the Children” has estimated in Italy around 336.000 children who had some experience in work between the age of 7 and 15, but these experiences are mostly related to some kind of family business, mainly in the South of Italy, where the aid is given by children on voluntary basis, as part of the family (for instance in harvesting grapes or apples). In forestry and related works, there are no report whatsoever of underage employees, even through the several inspection by authorities that are performed on the field, as it is a dangerous job. There is a binding rule to provide evidence of respecting laws and regulations through a document called “DURC”, that states the farmer has paid all due taxes and contributions for all workers and has never used illegal or controversial workers, including underage workers. After that Duferco obliges its suppliers to provide evidence of respecting all labour rights in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions; as Duferco is also ISO 45001 certified, once a year it is audited against that standard about Occupational Health and Safety Management System and the certification has always been maintained since it was first granted. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A.
Risk Rating	Low Risk

Italy Emilia-Romagna	Indicator
4.1.3	Child labour shall not be used.
Supply Base Verifiers	ILO Conventions Ministry of Labour and Social politics website: https://www.lavoro.gov.it/Pagine/Cerca-nelsito?search=lavoro+minorile Blog Save the Children organisation: savethechildren.it/blog-notizie/lavoro-minorile-in-italia-un-fenomenodiffusoma-invisibile Duferco Biomasse voluntary certifications
Risk Rating justification	Italy ratified in 1981 the ILO convention C138 - Minimum Age Convention, 1973 (No. 138) and in 2000 the ILO convention C182 – Worst forms of child labour convention, 1999 (No. 182). The ILO Convention C138 establish 15 years as minimum age for working; in Italy it is 15, but only after the legal obligation of school attendance of 10 years is achieved, starting at 5 or 6 years old. A recent evaluation by the organisation “Save the Children” has estimated in Italy around 336.000 children who had some experience in work between

	the age of 7 and 15, but these experiences are mostly related to some kind of family business, mainly in the South of Italy, where the aid is given by children on voluntary basis, as part of the family (for instance in harvesting grapes or apples). In forestry and related works, there are no report whatsoever of underage employees, even through the several inspection by authorities that are performed on the field, as it is a dangerous job. There is a binding rule to provide evidence of respecting laws and regulations through a document called “DURC”, that states the farmer has paid all due taxes and contributions for all workers and has never used illegal or controversial workers, including underage workers. After that Duferco obliges its suppliers to provide evidence of respecting all labour rights in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions; as Duferco is also ISO 45001 certified, once a year it is audited against that standard about Occupational Health and Safety Management System and the certification has always been maintained since it was first granted. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A.
Risk Rating	Low Risk

Italy Tuscany	Indicator
4.1.3	Child labour shall not be used.
Supply Base Verifiers	ILO Conventions Ministry of Labour and Social politics website: https://www.lavoro.gov.it/Pagine/Cerca-nelsito?search=lavoro+minorile Blog Save the Children organisation: savethechildren.it/blog-notizie/lavoro-minorile-in-italia-un-fenomenodiffusoma-invisibile Duferco Biomasse voluntary certifications
Risk Rating justification	Italy ratified in 1981 the ILO convention C138 - Minimum Age Convention, 1973 (No. 138) and in 2000 the ILO convention C182 – Worst forms of child labour convention, 1999 (No. 182). The ILO Convention C138 establish 15 years as minimum age for working; in Italy it is 15, but only after the legal obligation of school attendance of 10 years is achieved, starting at 5 or 6 years old. A recent evaluation by the organisation “Save the Children” has estimated in Italy around 336.000 children who had some experience in work between the age of 7 and 15, but these experiences are mostly related to some kind of family business, mainly in the South of Italy, where the aid is given by children on voluntary basis, as part of the family (for instance in harvesting grapes or apples). In forestry and related works, there are no report whatsoever of underage

	employees, even through the several inspection by authorities that are performed on the field, as it is a dangerous job. There is a binding rule to provide evidence of respecting laws and regulations through a document called “DURC”, that states the farmer has paid all due taxes and contributions for all workers and has never used illegal or controversial workers, including underage workers. After that Duferco obliges its suppliers to provide evidence of respecting all labour rights in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions; as Duferco is also ISO 45001 certified, once a year it is audited against that standard about Occupational Health and Safety Management System and the certification has always been maintained since it was first granted. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A.
Risk Rating	Low Risk

Italy Apulia	Indicator
4.1.3	Child labour shall not be used.
Supply Base Verifiers	Article Save the children https://www.savethechildren.it/blog-notizie/lavoro-minorile-in-italia-un-fenomeno-diffuso-ma-invisibile Ministry website https://www.lavoro.gov.it/Pagine/Cerca-nel-sito?search=lavoro+minorile -ILO Conventions https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO::
Risk Rating justification	Italy ratified in 1981 the ILO convention C138 - Minimum Age Convention, 1973 (No. 138) and in 2000 the ILO convention C182 – Worst forms of child labour convention, 1999 (No. 182). The ILO Convention C138 establish 15 years as minimum age for working; in Italy it is 15, but only after the legal obligation of school attendance of 10 years is achieved, starting at 5 or 6 years old. A recent evaluation by the organisation “Save the Children” has estimated in Italy around 336.000 children who had some experience in work between the age of 7 and 15, but these experiences are mostly related to some kind of family business, mainly in the South of Italy, where the aid is given by children on voluntary basis, as part of the family (for instance in harvesting grapes or apples).

	In forestry and related works such as eradication of trees, there are no report whatsoever of underage employees, even through the several inspection by authorities that are performed on the field, as it is a dangerous job. Illegal underage immigrants in agricultural works may be an issue in this matter, but as long as grants are given to replant olive trees, there is a binding rule to provide evidence of respecting laws and regulations through a document called “DURC”, that states the farmer has paid all due taxes and contributions for all workers and has never used illegal or controversial workers, including underage workers. Duferco is FSC certified and provides evidence annually to the CB about respecte of ILO Conventions; as Duferco is also ISO 45001 certified, once a year it is audited against that standard about Occupational Health and Safety Management System and the certification has always been maintained since it was first granted After that Duferco obliges its suppliers to provide evidence of respecting all labour rights in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes.
Risk Rating	Low Risk

Italy Lombardy	Indicator
4.1.3	Child labour shall not be used.
Supply Base Verifiers	ILO Conventions Ministry of Labour and Social politics website: https://www.lavoro.gov.it/Pagine/Cerca-nelsito?search=lavoro+minorile Blog Save the Children organisation: savethechildren.it/blog-notizie/lavoro-minorile-in-italia-un-fenomenodiffusoma-invisibile Duferco Biomasse voluntary certifications
Risk Rating justification	Italy ratified in 1981 the ILO convention C138 - Minimum Age Convention, 1973 (No. 138) and in 2000 the ILO convention C182 – Worst forms of child labour convention, 1999 (No. 182). The ILO Convention C138 establish 15 years as minimum age for working; in Italy it is 15, but only after the legal obligation of school attendance of 10 years is achieved, starting at 5 or 6 years old. A recent evaluation by the organisation “Save the Children” has estimated in Italy around 336.000 children who had some experience in work between the age of 7 and 15, but these experiences are mostly related to some kind of family business, mainly in the South of Italy, where the aid is given by children on voluntary basis, as part of the family (for instance in harvesting grapes or apples).

	In forestry and related works, there are no report whatsoever of underage employees, even through the several inspection by authorities that are performed on the field, as it is a dangerous job. There is a binding rule to provide evidence of respecting laws and regulations through a document called “DURC”, that states the farmer has paid all due taxes and contributions for all workers and has never used illegal or controversial workers, including underage workers. After that Duferco obliges its suppliers to provide evidence of respecting all labour rights in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions; as Duferco is also ISO 45001 certified, once a year it is audited against that standard about Occupational Health and Safety Management System and the certification has always been maintained since it was first granted. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A.
Risk Rating	Low Risk

Italy Veneto	Indicator
4.1.3	Child labour shall not be used.
Supply Base Verifiers	ILO Conventions Ministry of Labour and Social politics website: https://www.lavoro.gov.it/Pagine/Cerca-nelsito?search=lavoro+minorile Blog Save the Children organisation: savethechildren.it/blog-notizie/lavoro-minorile-in-italia-un-fenomenodiffusoma-invisibile Duferco Biomasse voluntary certifications
Risk Rating justification	Italy ratified in 1981 the ILO convention C138 - Minimum Age Convention, 1973 (No. 138) and in 2000 the ILO convention C182 – Worst forms of child labour convention, 1999 (No. 182). The ILO Convention C138 establish 15 years as minimum age for working; in Italy it is 15, but only after the legal obligation of school attendance of 10 years is achieved, starting at 5 or 6 years old. A recent evaluation by the organisation “Save the Children” has estimated in Italy around 336.000 children who had some experience in work between the age of 7 and 15, but these experiences are mostly related to some kind of family business, mainly in the South of Italy, where the aid is given by children on voluntary basis, as part of the family (for instance in harvesting grapes or apples). In forestry and related works, there are no report whatsoever of underage employees, even through the several inspection by authorities that are performed on the field, as it is a dangerous job. There is a binding rule to provide evidence of respecting laws and regulations through a document called “DURC”, that states the farmer has

	paid all due taxes and contributions for all workers and has never used illegal or controversial workers, including underage workers. After that Duferco obliges its suppliers to provide evidence of respecting all labour rights in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions; as Duferco is also ISO 45001 certified, once a year it is audited against that standard about Occupational Health and Safety Management System and the certification has always been maintained since it was first granted. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A.
Risk Rating	Low Risk

Italy Apulia	Indicator
4.1.4	Workers shall not be discriminated in hiring, remuneration, access to training, promotion, termination or retirement.
Supply Base Verifiers	ILO Conventions Italian Constitution ("Costituzione") Ministry of Labour and Social politics website Duferco Biomasse voluntary certifications
Risk Rating justification	Italian Constitution (1947) at article 3 banishes all discriminations ("All citizens possess equal social dignity and are equal before the law, without distinction of sex, race, language, religion and political orientation, personal and social conditions."). Italian Constitution (1947) at several articles states about labour rights: - Art. 35: "The Republic shall protect labour in all its forms and practices. It shall provide for the training and advancement of workers."; - Art. 36: "Workers have the right to a remuneration proportional to the quantity and quality of their work and, in any case, sufficient to ensuring them and their families a free and dignified existence."; - Art. 37: "Working women shall have the same rights and, the work being equal, the same remuneration as working men.". Italy ratified in 1960 the ILO convention C111 – Discrimination, employment and occupation, 1958 (No. 111) and in 1953 the ILO convention C100 – Equeal remuneration convention, 1951 (No. 100). The Workers' Statute (Act 300, 1970) guarantees against any kind of discrimination for reasons of sex, race, language, religion, political opinion. Act 604 (1966) forbids termination for discriminatory reasons such as political and union activities, religion and more. Act 903 (1977) and Act 125 (1991) encourage equality between men and

	women. Act 108 (1990) invalidates termination due to discriminatory reasons, such as race, sex, language, political and union views, religion, and requires reinstatement of the dismissed worker. National law enforcement in labour rights is very detailed and strong, and trade unions associated workers in Italy are 32,5% against the average 15,8% within OCSE (meaning more than double). The score for Italy in the Gender Equality Index is 61.9 out of 100 (below the average EU index of 63.4 out of 100), but it has been increasing every year in the last few years. The law enforcement is consistent in labour rights and workers can apply in court any time in case of discrimination. As for training issues, besides the Rome Office, the ILO is also represented in Italy by the International Training Centre in Turin since 1965. After that Duferco obliges its suppliers to provide evidence of respecting all labour rights in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Besides, Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions.
Risk Rating	Low Risk

Italy Tuscany	Indicator
4.1.4	Workers shall not be discriminated in hiring, remuneration, access to training, promotion, termination or retirement.
Supply Base Verifiers	ILO Conventions Italian Constitution ("Costituzione") Ministry of Labour and Social politics website Duferco Biomasse voluntary certifications
Risk Rating justification	Italian Constitution (1947) at article 3 banishes all discriminations ("All citizens possess equal social dignity and are equal before the law, without distinction of sex, race, language, religion and political orientation, personal and social conditions."). Italian Constitution (1947) at several articles states about labour rights: - Art. 35: "The Republic shall protect labour in all its forms and practices. It shall provide for the training and advancement of workers."; - Art. 36: "Workers have the right to a remuneration proportional to the quantity and quality of their work and, in any case, sufficient to ensuring them and their families a free and dignified existence."; - Art. 37: "Working women shall have the same rights and, the work being

	equal, the same remuneration as working men.”. Italy ratified in 1960 the ILO convention C111 – Discrimination, employment and occupation, 1958 (No. 111) and in 1953 the ILO convention C100 – Equeal remuneration convention, 1951 (No. 100). The Workers’ Statute (Act 300, 1970) garantees against any kind of discrimination for reasons of sex, race, language, religion, political opinion. Act 604 (1966) forbids termination for discriminatory reasons such as political and union activities, religion and more. Act 903 (1977) and Act 125 (1991) encourage equality between men and women. Act 108 (1990) invalidates termination due to discriminatory reasons, such as race, sex, language, political and union views, religion, and requires reinstatement of the dismissed worker. National law enforcement in labour rights is very detailed and strong, and trade unions associated workers in Italy are 32,5% against the average 15,8% within OCSE (meaning more than double). The score for Italy in the Gender Equality Index is 61.9 out of 100 (below the average EU index of 63.4 out of 100), but it has been increasing every year in the last few years. The law enforcement is consistent in labour rights and workers can apply in court any time in case of discrimination. As for training issues, besides the Rome Office, the ILO is also represented in Italy by the International Training Centre in Turin since 1965. After that Duferco obliges its suppliers to provide evidence of respecting all labour rights in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Besides, Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A. Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Low Risk

Italy Emilia-Romagna	Indicator
4.1.4	Workers shall not be discriminated in hiring, remuneration, access to training, promotion, termination or retirement.
Supply Base Verifiers	ILO Conventions Italian Constitution (“Costituzione”) Ministry of Labour and Social politics website Duferco Biomasse voluntary certifications
Risk Rating justification	Italian Constitution (1947) at article 3 banishes all discriminations (“All citizens possess equal social dignity and are equal before the law, without

	distinction of sex, race, language, religion and political orientation, personal and social conditions.”). Italian Constitution (1947) at several articles states about labour rights: - Art. 35: “The Republic shall protect labour in all its forms and practices. It shall provide for the training and advancement of workers.”; - Art. 36: “Workers have the right to a remuneration proportional to the quantity and quality of their work and, in any case, sufficient to ensuring them and their families a free and dignified existence.”; - Art. 37: “Working women shall have the same rights and, the work being equal, the same remuneration as working men.”. Italy ratified in 1960 the ILO convention C111 – Discrimination, employment and occupation, 1958 (No. 111) and in 1953 the ILO convention C100 – Eequal remuneration convention, 1951 (No. 100). The Workers’ Statute (Act 300, 1970) guarantees against any kind of discrimination for reasons of sex, race, language, religion, political opinion. Act 604 (1966) forbids termination for discriminatory reasons such as political and union activities, religion and more. Act 903 (1977) and Act 125 (1991) encourage equality between men and women. Act 108 (1990) invalidates termination due to discriminatory reasons, such as race, sex, language, political and union views, religion, and requires reinstatement of the dismissed worker. National law enforcement in labour rights is very detailed and strong, and trade unions associated workers in Italy are 32,5% against the average 15,8% within OCSE (meaning more than double). The score for Italy in the Gender Equality Index is 61.9 out of 100 (below the average EU index of 63.4 out of 100), but it has been increasing every year in the last few years. The law enforcement is consistent in labour rights and workers can apply in court any time in case of discrimination. As for training issues, besides the Rome Office, the ILO is also represented in Italy by the International Training Centre in Turin since 1965. After that Duferco obliges its suppliers to provide evidence of respecting all labour rights in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Besides, Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A. Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Low Risk

Italy
Lazio

Indicator

4.1.4	Workers shall not be discriminated in hiring, remuneration, access to training, promotion, termination or retirement.
Supply Base Verifiers	ILO Conventions Italian Constitution (“Costituzione”) Ministry of Labour and Social politics website Duferco Biomasse voluntary certifications
Risk Rating justification	Italian Constitution (1947) at article 3 banishes all discriminations (“All citizens possess equal social dignity and are equal before the law, without distinction of sex, race, language, religion and political orientation, personal and social conditions.”). Italian Constitution (1947) at several articles states about labour rights: - Art. 35: “The Republic shall protect labour in all its forms and practices. It shall provide for the training and advancement of workers.”; - Art. 36: “Workers have the right to a remuneration proportional to the quantity and quality of their work and, in any case, sufficient to ensuring them and their families a free and dignified existence.”; - Art. 37: “Working women shall have the same rights and, the work being equal, the same remuneration as working men.”. Italy ratified in 1960 the ILO convention C111 – Discrimination, employment and occupation, 1958 (No. 111) and in 1953 the ILO convention C100 – Eequal remuneration convention, 1951 (No. 100). The Workers’ Statute (Act 300, 1970) guarantees against any kind of discrimination for reasons of sex, race, language, religion, political opinion. Act 604 (1966) forbids termination for discriminatory reasons such as political and union activities, religion and more. Act 903 (1977) and Act 125 (1991) encourage equality between men and women. Act 108 (1990) invalidates termination due to discriminatory reasons, such as race, sex, language, political and union views, religion, and requires reinstatement of the dismissed worker. National law enforcement in labour rights is very detailed and strong, and trade unions associated workers in Italy are 32,5% against the average 15,8% within OCSE (meaning more than double). The score for Italy in the Gender Equality Index is 61.9 out of 100 (below the average EU index of 63.4 out of 100), but it has been increasing every year in the last few years. The law enforcement is consistent in labour rights and workers can apply in court any time in case of discrimination. As for training issues, besides the Rome Office, the ILO is also represented in Italy by the International Training Centre in Turin since 1965. After that Duferco obliges its suppliers to provide evidence of respecting all labour rights in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Besides, Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions. This applies to forest lots and also to operations in the agricultural land or

	landscape related to sourcing feedstock within TOF Group 2A and 3A. Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Low Risk

Spain 6 regions in East and South Spain	Indicator
4.1.4	Workers shall not be discriminated in hiring, remuneration, access to training, promotion, termination or retirement.
Supply Base Verifiers	ILO Conventions Spanish Constitution Workers' Statute of Spain National laws: Ley 15/2022, de 12 de julio, integral para la igualdad de trato y la no discriminación Ley Orgánica 3/2022, de 31 de marzo, de ordenación e integración de la Formación Profesional Duferco Biomasse voluntary certifications Gender Equality Index - SPAIN
Risk Rating justification	The score for Spain in the Gender Equality Index 2025 is 70.9 out of 100 (above to the average EU index of 63.4 out of 100). The law enforcement is consistent in labour rights and workers can apply in court any time in case of discrimination. After that Duferco obliges its suppliers to provide evidence of respecting all labour rights in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Besides, Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions. This applies to forest lots and also to operations in the agricultural land related to sourcing feedstock within TOF Group 3A.
Risk Rating	Low Risk

Italy Veneto	Indicator
4.1.4	Workers shall not be discriminated in hiring, remuneration, access to training, promotion, termination or retirement.
Supply Base Verifiers	ILO Conventions Italian Constitution ("Costituzione") Ministry of Labour and Social politics website Duferco Biomasse voluntary certifications
Risk Rating justification	Italian Constitution (1947) at article 3 banishes all discriminations ("All citizens possess equal social dignity and are equal before the law, without

	distinction of sex, race, language, religion and political orientation, personal and social conditions.”). Italian Constitution (1947) at several articles states about labour rights: - Art. 35: “The Republic shall protect labour in all its forms and practices. It shall provide for the training and advancement of workers.”; - Art. 36: “Workers have the right to a remuneration proportional to the quantity and quality of their work and, in any case, sufficient to ensuring them and their families a free and dignified existence.”; - Art. 37: “Working women shall have the same rights and, the work being equal, the same remuneration as working men.”. Italy ratified in 1960 the ILO convention C111 – Discrimination, employment and occupation, 1958 (No. 111) and in 1953 the ILO convention C100 – Eequal remuneration convention, 1951 (No. 100). The Workers’ Statute (Act 300, 1970) guarantees against any kind of discrimination for reasons of sex, race, language, religion, political opinion. Act 604 (1966) forbids termination for discriminatory reasons such as political and union activities, religion and more. Act 903 (1977) and Act 125 (1991) encourage equality between men and women. Act 108 (1990) invalidates termination due to discriminatory reasons, such as race, sex, language, political and union views, religion, and requires reinstatement of the dismissed worker. National law enforcement in labour rights is very detailed and strong, and trade unions associated workers in Italy are 32,5% against the average 15,8% within OCSE (meaning more than double). The score for Italy in the Gender Equality Index is 68.2 out of 100 (close to the average EU index of 70.2 out of 100), and it has been increasing every year in the last few years. The law enforcement is consistent in labour rights and workers can apply in court any time in case of discrimination. As for training issues, besides the Rome Office, the ILO is also represented in Italy by the International Training Centre in Turin since 1965. After that Duferco obliges its suppliers to provide evidence of respecting all labour rights in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Besides, Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A. Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Low Risk

Italy
Lombardy

Indicator

4.1.4	Workers shall not be discriminated in hiring, remuneration, access to training, promotion, termination or retirement.
Supply Base Verifiers	ILO Conventions Italian Constitution (“Costituzione”) Ministry of Labour and Social politics website Duferco Biomasse voluntary certifications
Risk Rating justification	Italian Constitution (1947) at article 3 banishes all discriminations (“All citizens possess equal social dignity and are equal before the law, without distinction of sex, race, language, religion and political orientation, personal and social conditions.”). Italian Constitution (1947) at several articles states about labour rights: - Art. 35: “The Republic shall protect labour in all its forms and practices. It shall provide for the training and advancement of workers.”; - Art. 36: “Workers have the right to a remuneration proportional to the quantity and quality of their work and, in any case, sufficient to ensuring them and their families a free and dignified existence.”; - Art. 37: “Working women shall have the same rights and, the work being equal, the same remuneration as working men.”. Italy ratified in 1960 the ILO convention C111 – Discrimination, employment and occupation, 1958 (No. 111) and in 1953 the ILO convention C100 – Eequal remuneration convention, 1951 (No. 100). The Workers’ Statute (Act 300, 1970) guarantees against any kind of discrimination for reasons of sex, race, language, religion, political opinion. Act 604 (1966) forbids termination for discriminatory reasons such as political and union activities, religion and more. Act 903 (1977) and Act 125 (1991) encourage equality between men and women. Act 108 (1990) invalidates termination due to discriminatory reasons, such as race, sex, language, political and union views, religion, and requires reinstatement of the dismissed worker. National law enforcement in labour rights is very detailed and strong, and trade unions associated workers in Italy are 32,5% against the average 15,8% within OCSE (meaning more than double). The score for Italy in the Gender Equality Index is 68.2 out of 100 (close to the average EU index of 70.2 out of 100), and it has been increasing every year in the last few years. The law enforcement is consistent in labour rights and workers can apply in court any time in case of discrimination. As for training issues, besides the Rome Office, the ILO is also represented in Italy by the International Training Centre in Turin since 1965. After that Duferco obliges its suppliers to provide evidence of respecting all labour rights in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Besides, Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A.

	Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Low Risk

Spain 6 regions in East and South Spain	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	ILO partnerships Spain profile: https://www.ilo.org/spain National law enforcement Real Decreto-ley 3/2004, de 25 de junio, para la racionalización de la regulación del salario mínimo interprofesional y para el incremento de su cuantía. Duferco Biomasse voluntary certifications
Risk Rating justification	In Spain, government holds consultations with the most representative trade union organisations and business associations before setting the Salario Mínimo Interprofesional (Minimum Wage) for permanent, casual, and temporary workers alike, as well as for domestic employees, taking account of the Consumer Price Index, the average national productivity achieved, the increase in the share of work in national income, and the general economic situation. Collective bargaining agreements usually exist, with remuneration and conditions for the sector's workers. In the same way if taxes are not paid by its suppliers, Hacienda notifies Duferco suppliers as a counteragent of the debtor, as does Social Security. These are the two most powerful agencies in the state about these issues. If a debt due to Social Security is not paid, the state automatically interrupts the activity of that company, leading to prison sentences as well as high fines. After that Duferco obliges its suppliers to provide evidence of respecting all labour rights, including wages, in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Besides, Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions. Applications in the matter of wages are verified by sampling by the CB during FSC annual audit. This applies to forest lots and also to operations in the agricultural land related to sourcing feedstock within TOF Group 3A.
Risk Rating	Low Risk

Italy Lazio	Indicator
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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	ILO National labour Law profile: https://www.ilo.org/resource/national-labour-law-profile-italy Italian Constitution ("Costituzione") Duferco Biomasse voluntary certifications
Risk Rating justification	Article 36 of the Italian Constitution includes the right of the worker to a liveable wage for himself and his/her family. Under Italian law there is not a statutory minimum wage. Yet most workers are actually covered by a minimum wage agreement, established through collective bargaining (various national contract, CCNL), that is used as reference for other work contracts within similar work activities. There is also a state fund ("Cassa Integrazione Guadagni", first established in 1954) that protects the workers' earnings in the event the enterprise has difficulties; it covers now many activities, including agriculture enterprises, in specific events such as natural disasters or regional or sectoral economic crisis. The Cassa Integrazione Guadagni operates mostly in cases of suspension or temporary reduction of activity due to causes beyond the will of the enterprise or the workers, or market fluctuations. Workers whose contracts of employment have been suspended on these grounds can be paid 80% (sometimes up to 100 %) of their previous earnings within a threshold. This benefit can be paid for up to 13 weeks, with possible renewal for up to 12 months (in some identified depressed areas it can be paid for up to 24 months). In forestry works, all workers are under collective bargaining since they have a valid contract with the enterprise performing the work. The same applies for transportation and handling in the port of Civitavecchia. The law enforcement is consistent in wages and paid leaves and workers can apply in court any time in case of disrespect of collective or individual contracts. After that Duferco obliges its suppliers to provide evidence of respecting all labour rights, including wages, in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Besides, Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A
Risk Rating	Low Risk

Italy Emilia-Romagna	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	ILO National labour Law profile:

	https://www.ilo.org/resource/national-labour-law-profile-italy Italian Constitution (“Costituzione”) Duferco Biomasse voluntary certifications
Risk Rating justification	Article 36 of the Italian Constitution includes the right of the worker to a liveable wage for himself and his/her family. Under Italian law there is not a statutory minimum wage. Yet most workers are actually covered by a minimum wage agreement, established through collective bargaining (various national contract, CCNL), that is used as reference for other work contracts within similar work activities. There is also a state fund (“Cassa Integrazione Guadagni”, first established in 1954) that protects the workers’ earnings in the event the enterprise has difficulties; it covers now many activities, including agriculture enterprises, in specific events such as natural disasters or regional or sectoral economic crisis. The Cassa Integrazione Guadagni operates mostly in cases of suspension or temporary reduction of activity due to causes beyond the will of the enterprise or the workers, or market fluctuations. Workers whose contracts of employment have been suspended on these grounds can be paid 80% (sometimes up to 100 %) of their previous earnings within a threshold. This benefit can be paid for up to 13 weeks, with possible renewal for up to 12 months (in some identified depressed areas it can be paid for up to 24 months). In forestry works, all workers are under collective bargaining since they have a valid contract with the enterprise performing the work. The same applies for transportation and handling in the port of Livorno. The law enforcement is consistent in wages and paid leaves and workers can apply in court any time in case of disrespect of collective or individual contracts. After that Duferco obliges its suppliers to provide evidence of respecting all labour rights, including wages, in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Besides, Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A.
Risk Rating	Low Risk

Italy Tuscany	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	ILO National labour Law profile: https://www.ilo.org/resource/national-labour-law-profile-italy Italian Constitution (“Costituzione”) Duferco Biomasse voluntary certifications

Risk Rating justification	Article 36 of the Italian Constitution includes the right of the worker to a liveable wage for himself and his/her family. Under Italian law there is not a statutory minimum wage. Yet most workers are actually covered by a minimum wage agreement, established through collective bargaining (various national contract, CCNL), that is used as reference for other work contracts within similar work activities. There is also a state fund (“Cassa Integrazione Guadagni”, first established in 1954) that protects the workers’ earnings in the event the enterprise has difficulties; it covers now many activities, including agriculture enterprises, in specific events such as natural disasters or regional or sectoral economic crisis. The Cassa Integrazione Guadagni operates mostly in cases of suspension or temporary reduction of activity due to causes beyond the will of the enterprise or the workers, or market fluctuations. Workers whose contracts of employment have been suspended on these grounds can be paid 80% (sometimes up to 100 %) of their previous earnings within a threshold. This benefit can be paid for up to 13 weeks, with possible renewal for up to 12 months (in some identified depressed areas it can be paid for up to 24 months). In forestry works, all workers are under collective bargaining since they have a valid contract with the enterprise performing the work. The same applies for transportation and handling in the port of Livorno. The law enforcement is consistent in wages and paid leaves and workers can apply in court any time in case of disrespect of collective or individual contracts. After that Duferco obliges its suppliers to provide evidence of respecting all labour rights, including wages, in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Besides, Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A.
Risk Rating	Low Risk

Italy Apulia	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	ILO National labour Law profile: https://www.ilo.org/resource/national-labour-law-profile-italy Italian Constitution (“Costituzione”) Duferco Biomasse voluntary certifications

Risk Rating justification	Article 36 of the Italian Constitution includes the right of the worker to a liveable wage for himself and his/her family. Under Italian law there is not a statutory minimum wage. Yet most workers are actually covered by a minimum wage agreement, established through collective bargaining (various national contract, CCNL), that is used as reference for other work contracts within similar work activities. There is also a state fund ("Cassa Integrazione Guadagni", first established in 1954) that protects the workers' earnings in the event the enterprise has difficulties; it covers now many activities, including agriculture enterprises, in specific events such as natural disasters or regional or sectoral economic crisis. The Cassa Integrazione Guadagni operates mostly in cases of suspension or temporary reduction of activity due to causes beyond the will of the enterprise or the workers, or market fluctuations. Workers whose contracts of employment have been suspended on these grounds can be paid 80% (sometimes up to 100 %) of their previous earnings within a threshold. This benefit can be paid for up to 13 weeks, with possible renewal for up to 12 months (in some identified depressed areas it can be paid for up to 24 months). In the eradication of olive trees, all workers are under collective bargaining since they have a valid contract with the enterprise performing the work. The same applies for transportation and handling in the port of Brindisi. The law enforcement is consistent in wages and paid leaves and workers can apply in court any time in case of disrespect of collective or individual contracts. After that Duferco obliges its suppliers to provide evidence of respecting all labour rights, in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Besides, Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions. Applications in the matter of wages are verified by sampling by the CB during FSC annual audit.
Risk Rating	Low Risk

Italy Lombardy	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	· ILO National labour Law profile: https://www.ilo.org/resource/national-labour-law-profile-italy · Italian Constitution ("Costituzione") - Duferco Biomasse voluntary certifications

Risk Rating justification	Article 36 of the Italian Constitution includes the right of the worker to a liveable wage for himself and his/her family. Under Italian law there is not a statutory minimum wage. Yet most workers are actually covered by a minimum wage agreement, established through collective bargaining (various national contract, CCNL), that is used as reference for other work contracts within similar work activities. There is also a state fund ("Cassa Integrazione Guadagni", first established in 1954) that protects the workers' earnings in the event the enterprise has difficulties; it covers now many activities, including agriculture enterprises, in specific events such as natural disasters or regional or sectoral economic crisis. The Cassa Integrazione Guadagni operates mostly in cases of suspension or temporary reduction of activity due to causes beyond the will of the enterprise or the workers, or market fluctuations. Workers whose contracts of employment have been suspended on these grounds can be paid 80% (sometimes up to 100 %) of their previous earnings within a threshold. This benefit can be paid for up to 13 weeks, with possible renewal for up to 12 months (in some identified depressed areas it can be paid for up to 24 months). In the eradication of olive trees, all workers are under collective bargaining since they have a valid contract with the enterprise performing the work. The same applies for transportation and handling in the port of Brindisi. The law enforcement is consistent in wages and paid leaves and workers can apply in court any time in case of disrespect of collective or individual contracts. After that Duferco obliges its suppliers to provide evidence of respecting all labour rights, in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Besides, Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions. Applications in the matter
Risk Rating	Low Risk

Italy Veneto	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	ILO National labour Law profile: https://www.ilo.org/resource/national-labour-law-profile-italy Italian Constitution ("Costituzione") Duferco Biomasse voluntary certifications
Risk Rating justification	Article 36 of the Italian Constitution includes the right of the worker to a liveable wage for himself and his/her family. Under Italian law there is not a statutory minimum wage. Yet most workers are actually covered by a minimum wage agreement, established through collective bargaining (various national contract, CCNL), that is used as reference for other work contracts within similar work activities.

	There is also a state fund (“Cassa Integrazione Guadagni”, first established in 1954) that protects the workers’ earnings in the event the enterprise has difficulties; it covers now many activities, including agriculture enterprises, in specific events such as natural disasters or regional or sectoral economic crisis. The Cassa Integrazione Guadagni operates mostly in cases of suspension or temporary reduction of activity due to causes beyond the will of the enterprise or the workers, or market fluctuations. Workers whose contracts of employment have been suspended on these grounds can be paid 80% (sometimes up to 100 %) of their previous earnings within a threshold. This benefit can be paid for up to 13 weeks, with possible renewal for up to 12 months (in some identified depressed areas it can be paid for up to 24 months). In forestry works, all workers are under collective bargaining since they have a valid contract with the enterprise performing the work. The same applies for transportation and handling in the ports. The law enforcement is consistent in wages and paid leaves and workers can apply in court any time in case of disrespect of collective or individual contracts. After that Duferco obliges its suppliers to provide evidence of respecting all labour rights, including wages, in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Besides, Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A.
Risk Rating	Low Risk

Italy Apulia	Indicator
4.1.6	Working hours shall comply with legal requirements.
Supply Base Verifiers	ILO National labour Law profile: https://www.ilo.org/resource/national-labour-law-profile-italy Italian Constitution (“Costituzione”) National Action Plan to tackle labour exploitation in agriculture Duferco Biomasse voluntary certifications
Risk Rating justification	Article 36 of the Constitution establishes that maximum working time must be fixed by law. ILO National Labour Law profile for Italy states that: “The old Act no.692 of March 1923, still partly in force, provided that the hours worked by employees ought not to exceed 8 hours a day. Collective agreements

	determine the normal weekly working time (never more than 40 hours). Work performed in excess of 40 hours a week is overtime. Different overtime limits can be fixed by collective agreements. In principle, overtime should be occasional or due to exceptional reasons which cannot be met by the hiring of new workers. Act 196/1997 requires a specific authorisation by the Department of Labour (Inspectorate) for work exceeding 48 hours a week (in practice: more than 8 hours overtime). Some enterprise-level agreements provide for a more substantial reduction in weekly working time in connection with a new shift system which allows a more intensive use of machinery and thus increased productivity. The law enforcement is consistent in working hours and workers can apply in court any time in case of disrespect by the employer. With the aim to prevent and tackle labour exploitation, on 20 February 2020, the Inter-Institutional Committee on labour exploitation adopted the first-ever National Action Plan to tackle labour exploitation in agriculture. The Committee is co-chaired by the Ministers of Labour and Social Policies and of Agriculture and composed of several national and local institutions, representatives of the social partners and civil society organizations. The Plan represents an important shift towards a more comprehensive and multi-dimensional approach and is structured around four strategic pillars (prevention, protection, enforcement and remedies) that are operationalized through ten priority actions and include both immediate measures and long-term interventions. It takes into account all the dimensions of labour exploitation in agriculture by fostering the efficiency and organization of the supply chains of the agro-food industry, promoting decent work and economic and social sustainability of enterprises, strengthening the effectiveness and transparency of labour intermediation, improving labour law enforcement and compliance, protecting and assisting victims, including through measures for their socio-economic inclusion. After that Duferco obliges its suppliers to provide evidence of respecting all labour rights in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Besides, Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions
Risk Rating	Low Risk

Italy Tuscany	Indicator
4.1.6	Working hours shall comply with legal requirements.
Supply Base Verifiers	ILO National labour Law profile: https://www.ilo.org/resource/national-labour-law-profile-italy Italian Constitution ("Costituzione") National Action Plan to tackle labour exploitation in agriculture: https://www.lavoro.gov.it/priorita/pagine/approvato-il-piano-nazionale-contro-

	lo-sfruttamento-e-il-caporalato-in-agricoltura Duferco Biomasse voluntary certifications
Risk Rating justification	Article 36 of the Constitution establishes that maximum working time must be fixed by law. ILO National Labour Law profile for Italy states that: “The old Act no.692 of March 1923, still partly in force, provided that the hours worked by employees ought not to exceed 8 hours a day. Collective agreements determine the normal weekly working time (never more than 40 hours). Work performed in excess of 40 hours a week is overtime. Different overtime limits can be fixed by collective agreements. In principle, overtime should be occasional or due to exceptional reasons which cannot be met by the hiring of new workers. Act 196/1997 requires a specific authorisation by the Department of Labour (Inspectorate) for work exceeding 48 hours a week (in practice: more than 8 hours overtime). Some enterprise-level agreements provide for a more substantial reduction in weekly working time in connection with a new shift system which allows a more intensive use of machinery and thus increased productivity. The law enforcement is consistent in working hours and workers can apply in court any time in case of disrespect by the employer. With the aim to prevent and tackle labour exploitation, on 20 February 2020, the Inter-Institutional Committee on labour exploitation adopted the first-ever National Action Plan to tackle labour exploitation in agriculture. The Committee is co-chaired by the Ministers of Labour and Social Policies and of Agriculture and composed of several national and local institutions, representatives of the social partners and civil society organizations. The Plan represents an important shift towards a more comprehensive and multi-dimensional approach and is structured around four strategic pillars (prevention, protection, enforcement and remedies) that are operationalized through ten priority actions and include both immediate measures and longterm interventions. It takes into account all the dimensions of labour exploitation in agriculture by fostering the efficiency and organization of the supply chains of the agro-food industry, promoting decent work and economic and social sustainability of enterprises, strengthening the effectiveness and transparency of labour intermediation, improving labour law enforcement and compliance, protecting and assisting victims, including through measures for their socio-economic inclusion. After that Duferco obliges its suppliers to provide evidence of respecting all labour rights in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Besides, Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A.
Risk Rating	Low Risk

Italy Emilia-Romagna	Indicator
4.1.6	Working hours shall comply with legal requirements.
Supply Base Verifiers	ILO National labour Law profile: https://www.ilo.org/resource/national-labour-law-profile-italy Italian Constitution (“Costituzione”) National Action Plan to tackle labour exploitation in agriculture Duferco Biomasse voluntary certifications
Risk Rating justification	Article 36 of the Constitution establishes that maximum working time must be fixed by law. ILO National Labour Law profile for Italy states that: “The old Act no.692 of March 1923, still partly in force, provided that the hours worked by employees ought not to exceed 8 hours a day. Collective agreements determine the normal weekly working time (never more than 40 hours). Work performed in excess of 40 hours a week is overtime. Different overtime limits can be fixed by collective agreements. In principle, overtime should be occasional or due to exceptional reasons which cannot be met by the hiring of new workers. Act 196/1997 requires a specific authorisation by the Department of Labour (Inspectorate) for work exceeding 48 hours a week (in practice: more than 8 hours overtime). Some enterprise-level agreements provide for a more substantial reduction in weekly working time in connection with a new shift system which allows a more intensive use of machinery and thus increased productivity. The law enforcement is consistent in working hours and workers can apply in court any time in case of disrespect by the employer. With the aim to prevent and tackle labour exploitation, on 20 February 2020, the Inter-Institutional Committee on labour exploitation adopted the first-ever National Action Plan to tackle labour exploitation in agriculture. The Committee is co-chaired by the Ministers of Labour and Social Policies and of Agriculture and composed of several national and local institutions, representatives of the social partners and civil society organizations. The Plan represents an important shift towards a more comprehensive and multi-dimensional approach and is structured around four strategic pillars (prevention, protection, enforcement and remedies) that are operationalized through ten priority actions and include both immediate measures and longterm interventions. It takes into account all the dimensions of labour exploitation in agriculture by fostering the efficiency and organization of the supply chains of the agro-food industry, promoting decent work and economic and social sustainability of enterprises, strengthening the effectiveness and transparency of labour intermediation, improving labour law enforcement and compliance, protecting and assisting victims, including through measures for their socio-economic inclusion. After that Duferco obliges its suppliers to provide evidence of respecting all labour rights in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Besides, Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions.

	This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A
Risk Rating	Low Risk

Italy Lazio	Indicator
4.1.6	Working hours shall comply with legal requirements.
Supply Base Verifiers	ILO National labour Law profile: https://www.ilo.org/resource/national-labour-law-profile-italy Italian Constitution ("Costituzione") National Action Plan to tackle labour exploitation in agriculture Duferco Biomasse voluntary certifications
Risk Rating justification	Article 36 of the Constitution establishes that maximum working time must be fixed by law. ILO National Labour Law profile for Italy states that: "The old Act no.692 of March 1923, still partly in force, provided that the hours worked by employees ought not to exceed 8 hours a day. Collective agreements determine the normal weekly working time (never more than 40 hours). Work performed in excess of 40 hours a week is overtime. Different overtime limits can be fixed by collective agreements. In principle, overtime should be occasional or due to exceptional reasons which cannot be met by the hiring of new workers. Act 196/1997 requires a specific authorisation by the Department of Labour (Inspectorate) for work exceeding 48 hours a week (in practice: more than 8 hours overtime). Some enterprise-level agreements provide for a more substantial reduction in weekly working time in connection with a new shift system which allows a more intensive use of machinery and thus increased productivity. The law enforcement is consistent in working hours and workers can apply in court any time in case of disrespect by the employer. With the aim to prevent and tackle labour exploitation, on 20 February 2020, the Inter-Institutional Committee on labour exploitation adopted the first-ever National Action Plan to tackle labour exploitation in agriculture. The Committee is co-chaired by the Ministers of Labour and Social Policies and of Agriculture and composed of several national and local institutions, representatives of the social partners and civil society organizations. The Plan represents an important shift towards a more comprehensive and multi-dimensional approach and is structured around four strategic pillars (prevention, protection, enforcement and remedies) that are operationalized through ten priority actions and include both immediate measures and long-term interventions. It takes into account all the dimensions of labour exploitation in agriculture by fostering the efficiency and organization of the supply chains of the agro-food industry, promoting decent work and economic and social sustainability of enterprises, strengthening the effectiveness and transparency of labour intermediation, improving labour law enforcement and compliance, protecting and assisting victims, including through measures for their socio-economic inclusion.

	After that Duferco obliges its suppliers to provide evidence of respecting all labour rights in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Besides, Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A.
Risk Rating	Low Risk

Spain 6 regions in East and South Spain	Indicator
4.1.6	Working hours shall comply with legal requirements.
Supply Base Verifiers	National law enforcement: Real Decreto 2001/1983, de 28 de julio, sobre regulación de la jornada de trabajo, jornadas especiales y descansos. Duferco Biomasse voluntary certifications
Risk Rating justification	There is a strong legal framework in Spain about working hours. Workers normal working hours are 9 a day and 40 a week on average over a twelve- month reference period. The maximum number of overtime hours per year is 80. After that Duferco obliges its suppliers to provide evidence of respecting all labour rights in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Besides, Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions. This applies to forest lots and also to operations in the agricultural land related to sourcing feedstock within TOF Group 3A.
Risk Rating	Low Risk

Italy Veneto	Indicator
4.1.6	Working hours shall comply with legal requirements.
Supply Base Verifiers	ILO National labour Law profile: https://www.ilo.org/resource/national-labour-law-profile-italy Italian Constitution ("Costituzione") National Action Plan to tackle labour exploitation in agriculture Duferco Biomasse voluntary certifications
Risk Rating justification	Article 36 of the Constitution establishes that maximum working time must be fixed by law. ILO National Labour Law profile for Italy states that: "The old Act no.692 of March 1923, still partly in force, provided that the hours worked by employees

	ought not to exceed 8 hours a day. Collective agreements determine the normal weekly working time (never more than 40 hours). Work performed in excess of 40 hours a week is overtime. Different overtime limits can be fixed by collective agreements. In principle, overtime should be occasional or due to exceptional reasons which cannot be met by the hiring of new workers. Act 196/1997 requires a specific authorisation by the Department of Labour (Inspectorate) for work exceeding 48 hours a week (in practice: more than 8 hours overtime). Some enterprise-level agreements provide for a more substantial reduction in weekly working time in connection with a new shift system which allows a more intensive use of machinery and thus increased productivity. The law enforcement is consistent in working hours and workers can apply in court any time in case of disrespect by the employer. With the aim to prevent and tackle labour exploitation, on 20 February 2020, the Inter-Institutional Committee on labour exploitation adopted the first-ever National Action Plan to tackle labour exploitation in agriculture. The Committee is co-chaired by the Ministers of Labour and Social Policies and of Agriculture and composed of several national and local institutions, representatives of the social partners and civil society organizations. The Plan represents an important shift towards a more comprehensive and multi-dimensional approach and is structured around four strategic pillars (prevention, protection, enforcement and remedies) that are operationalized through ten priority actions and include both immediate measures and long-term interventions. It takes into account all the dimensions of labour exploitation in agriculture by fostering the efficiency and organization of the supply chains of the agro-food industry, promoting decent work and economic and social sustainability of enterprises, strengthening the effectiveness and transparency of labour intermediation, improving labour law enforcement and compliance, protecting and assisting victims, including through measures for their socio-economic inclusion. After that Duferco obliges its suppliers to provide evidence of respecting all labour rights in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Besides, Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A.
Risk Rating	Low Risk

Italy Lombardy	Indicator
4.1.6	Working hours shall comply with legal requirements.
Supply Base Verifiers	ILO National labour Law profile: https://www.ilo.org/resource/national-labour-law-profile-italy Italian Constitution ("Costituzione") National Action Plan to tackle labour exploitation in agriculture

	Duferco Biomasse voluntary certifications representatives of the social partners and civil society organizations. The Plan represents an important shift towards a more comprehensive and multi-dimensional approach and is structured around four strategic pillars (prevention, protection, enforcement and remedies) that are operationalized through ten priority actions and include both immediate measures and longterm interventions. It takes into account all the dimensions of labour exploitation in agriculture by fostering the efficiency and organization of the supply chains of the agro-food industry, promoting decent work and economic and social sustainability of enterprises, strengthening the effectiveness and transparency of labour intermediation, improving labour law enforcement and compliance, protecting and assisting victims, including through measures for their socio-economic inclusion. After that Duferco obliges its suppliers to provide evidence of respecting all labour rights in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Besides, Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A.
Risk Rating justification	Article 36 of the Constitution establishes that maximum working time must be fixed by law. ILO National Labour Law profile for Italy states that: "The old Act no.692 of March 1923, still partly in force, provided that the hours worked by employees ought not to exceed 8 hours a day. Collective agreements determine the normal weekly working time (never more than 40 hours). Work performed in excess of 40 hours a week is overtime. Different overtime limits can be fixed by collective agreements. In principle, overtime should be occasional or due to exceptional reasons which cannot be met by the hiring of new workers. Act 196/1997 requires a specific authorisation by the Department of Labour (Inspectorate) for work exceeding 48 hours a week (in practice: more than 8 hours overtime). Some enterprise-level agreements provide for a more substantial reduction in weekly working time in connection with a new shift system which allows a more intensive use of machinery and thus increased productivity. The law enforcement is consistent in working hours and workers can apply in court any time in case of disrespect by the employer. With the aim to prevent and tackle labour exploitation, on 20 February 2020, the Inter-Institutional Committee on labour exploitation adopted the first-ever National Action Plan to tackle labour exploitation in agriculture. The Committee is co-chaired by the Ministers of Labour and Social Policies and of Agriculture and composed of several national and local institutions,
Risk Rating	Low Risk

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	- Italian Constitution ("Costituzione") - Italian Civil Code (1942 and further updates) - ILO National labour Law profile: https://www.ilo.org/resource/national-labour-law-profile-italy - ILO conventions - Duferco Biomasse voluntary certifications
Risk Rating justification	All workers have the right to annual paid leave (art. 36 of the Constitution). Italian Constitution Art. 38 states: "Workers shall have the right to envisaged and assured adequate means for their subsistence needs in the event of an accident, illness, disability, old age and involuntary unemployment." Italy ratified the following ILO conventions: ILO convention C012 - Workmen's Compensation (Agriculture) Convention, 1921 ILO convention C038 - Invalidity Insurance (Agriculture) Convention, 1933 ILO convention C040 - Survivors' Insurance (Agriculture) Convention, 1933 ILO convention C042 - Workmen's Compensation (occupatioanl disease) Convention, 1934 ILO convention C048 – Maintanance of Migrants' Pension Rights Convention, 1935 ILO convention C118 - Equality of Treatment (Social Security) Convention, 1962 And many others related partially to this matter, see: https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO The Civil Code provides for a statutory minimum leave of eight days, for domestic workers only. Minimum leave of all other workers is determined by collective agreements, which generally provide for paid annual leave of not less than four weeks per year. Some agreements foresee additional vacation on the ground of seniority. During their vacation, employees receive normal pay, excluding only indemnities connected to the actual work. Italy ratified the ILO Holidays with Pay Convention (Revised), 1970 (no. 132) which provides for a minimum leave of not less than three working weeks for one year of service. Maternity leave (and also paternity leave) is a right for every women or men; during compulsory maternity leave, the mother is entitled to 80% of her regular pay from Social Security and the period is counted as actual work time. Collective agreements usually oblige the employer to make up the difference to the regular wage. During sickness, suspension of the contract, with job protection, lasts for periods usually determined by collective agreements, according to the employee's seniority. The average period is about one year. During this time, the worker is fully paid (by the employer or by the Social Security). Beyond this period an employee is usually entitled, under collective agreements, to a further period of unpaid leave. Student workers have the right to paid days off work to take exams.

	Retirement and compensation law and regulations are very detailed and effective in Italy, and are in constant re-negotiations between the Government and the trade unions (CGIL, CISL, UIL and many other small ones), as they are common rights that are very rooted in the public opinion. There are reports, both national and international, about disrespect of workers' rights by employer who illegally employ immigrants in agriculture, but measures are in place (see Indicator 4.16 about the National Action Plan to tackle labour exploitation in agriculture). After that Duferco obliges its suppliers to provide evidence of respecting all labour rights in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Besides, Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions; as it is also ISO 45001 certified, once a year it is audited against that standard about Occupational Health and Safety Management System. Duferco, as ISO 45001 certified enterprise, only contracts suppliers that can provide evidence of legal working conditions for all workers. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A.
Risk Rating	Low Risk

Italy Veneto	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	- Italian Constitution ("Costituzione") - Italian Civil Code (1942 and further updates) - ILO National labour Law profile: https://www.ilo.org/resource/national-labour-law-profile-italy - ILO conventions - Duferco Biomasse voluntary certifications
Risk Rating justification	All workers have the right to annual paid leave (art. 36 of the Constitution). Italian Constitution Art. 38 states: "Workers shall have the right to envisaged and assured adequate means for their subsistence needs in the event of an accident, illness, disability, old age and involuntary unemployment." Italy ratified the following ILO conventions: ILO convention C012 - Workmen's Compensation (Agriculture) Convention, 1921 ILO convention C038 - Invalidity Insurance (Agriculture) Convention, 1933 ILO convention C040 - Survivors' Insurance (Agriculture) Convention, 1933 ILO convention C042 - Workmen's Compensation (occupatioanl disease) Convention, 1934 ILO convention C048 - Maintanance of Migrants' Pension Rights Convention, 1935 ILO convention C118 - Equality of Treatment (Social Security) Convention, 1962

	And many others related partially to this matter, see: https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO The Civil Code provides for a statutory minimum leave of eight days, for domestic workers only. Minimum leave of all other workers is determined by collective agreements, which generally provide for paid annual leave of not less than four weeks per year. Some agreements foresee additional vacation on the ground of seniority. During their vacation, employees receive normal pay, excluding only indemnities connected to the actual work. Italy ratified the ILO Holidays with Pay Convention (Revised), 1970 (no. 132) which provides for a minimum leave of not less than three working weeks for one year of service. Maternity leave (and also paternity leave) is a right for every women or men; during compulsory maternity leave, the mother is entitled to 80% of her regular pay from Social Security and the period is counted as actual work time. Collective agreements usually oblige the employer to make up the difference to the regular wage. During sickness, suspension of the contract, with job protection, lasts for periods usually determined by collective agreements, according to the employee's seniority. The average period is about one year. During this time, the worker is fully paid (by the employer or by the Social Security). Beyond this period an employee is usually entitled, under collective agreements, to a further period of unpaid leave. Student workers have the right to paid days off work to take exams. Retirement and compensation law and regulations are very detailed and effective in Italy, and are in constant re-negotiations between the Government and the trade unions (CGIL, CISL, UIL and many other small ones), as they are common rights that are very rooted in the public opinion. There are reports, both national and international, about disrespect of workers' rights by employer who illegally employee immigrants in agriculture, but measures are in place (see Indicator 4.16 about the National Action Plan to tackle labour exploitation in agriculture). After that Duferco obliges its suppliers to provide evidence of respecting all labour rights in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Besides, Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions; as it is also ISO 45001 certified, once a year it is audited against that standard about Occupational Health and Safety Management System. Duferco, as ISO 45001 certified enterprise, only contracts suppliers that can provide evidence of legal working conditions for all workers. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A.
Risk Rating	Low Risk

Spain
6 regions in East and South
Spain

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	ILO Conventions -National law enforcement: Real Decreto Legislativo 8/2015, de 30 de octubre, por el que se aprueba el texto refundido de la Ley General de la Seguridad Social. -Spanish Ministry of Employment and Social Security, Strategic Plan for the Labour - Duferco Biomasse voluntary certification
Risk Rating justification	There is a strong legal framework in Spain about health care provisions, sickness benefits, retirement benefits, invalidity benefits, death benefits, and workers' compensation. After that Duferco obliges its suppliers to provide evidence of respecting all labour rights, through proper signed contracts and annexes. Besides, Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions. This applies to forest lots and also to operations in the agricultural land related to sourcing feedstock within TOF Group 3A.
Risk Rating	Low Risk

Italy Lazio	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	- Italian Constitution ("Costituzione") - Italian Civil Code (1942 and further updates) - ILO National labour Law profile: https://www.ilo.org/resource/national-labour-law-profile-italy - ILO conventions - Duferco Biomasse voluntary certifications
Risk Rating justification	All workers have the right to annual paid leave (art. 36 of the Constitution). Italian Constitution Art. 38 states: "Workers shall have the right to envisaged and assured adequate means for their subsistence needs in the event of an accident, illness, disability, old age and involuntary unemployment." Italy ratified the following ILO conventions: ILO convention C012 - Workmen's Compensation (Agriculture) Convention, 1921 ILO convention C038 - Invalidity Insurance (Agriculture) Convention, 1933 ILO convention C040 - Survivors' Insurance (Agriculture) Convention, 1933 ILO convention C042 - Workmen's Compensation (occupatioanl disease) Convention, 1934 ILO convention C048 – Maintanance of Migrants' Pension Rights Convention, 1935 ILO convention C118 - Equality of Treatment (Social Security) Convention,

	1962 And many others related partially to this matter, see: https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO The Civil Code provides for a statutory minimum leave of eight days, for domestic workers only. Minimum leave of all other workers is determined by collective agreements, which generally provide for paid annual leave of not less than four weeks per year. Some agreements foresee additional vacation on the ground of seniority. During their vacation, employees receive normal pay, excluding only indemnities connected to the actual work. Italy ratified the ILO Holidays with Pay Convention (Revised), 1970 (no. 132) which provides for a minimum leave of not less than three working weeks for one year of service. Maternity leave (and also paternity leave) is a right for every women or men; during compulsory maternity leave, the mother is entitled to 80% of her regular pay from Social Security and the period is counted as actual work time. Collective agreements usually oblige the employer to make up the difference to the regular wage. During sickness, suspension of the contract, with job protection, lasts for periods usually determined by collective agreements, according to the employee's seniority. The average period is about one year. During this time, the worker is fully paid (by the employer or by the Social Security). Beyond this period an employee is usually entitled, under collective agreements, to a further period of unpaid leave. Student workers have the right to paid days off work to take exams. Retirement and compensation law and regulations are very detailed and effective in Italy, and are in constant re-negotiations between the Government and the trade unions (CGIL, CISL, UIL and many other small ones), as they are common rights that are very rooted in the public opinion. There are reports, both national and international, about disrespect of workers' rights by employer who illegally employee immigrants in agriculture, but measures are in place (see Indicator 4.16 about the National Action Plan to tackle labour exploitation in agriculture). After that Duferco obliges its suppliers to provide evidence of respecting all labour rights in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Besides, Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions; as it is also ISO 45001 certified, once a year it is audited against that standard about Occupational Health and Safety Management System. Duferco, as ISO 45001 certified enterprise, only contracts suppliers that can provide evidence of legal working conditions for all workers. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A.
Risk Rating	Low Risk

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	- Italian Constitution ("Costituzione") - Italian Civil Code (1942 and further updates) - ILO National labour Law profile: https://www.ilo.org/resource/national-labour-law-profile-italy - ILO conventions - Duferco Biomasse voluntary certifications
Risk Rating justification	In Italy workers have the right to annual paid leave (art. 36 of the Constitution). Italian Constitution Art. 38 states: "Workers shall have the right to envisaged and assured adequate means for their subsistence needs in the event of an accident, illness, disability, old age and involuntary unemployment." Italy ratified the following ILO conventions: ILO convention C012 - Workmen's Compensation (Agriculture) Convention, 1921 ILO convention C038 - Invalidity Insurance (Agriculture) Convention, 1933 ILO convention C040 - Survivors' Insurance (Agriculture) Convention, 1933 ILO convention C042 - Workmen's Compensation (occupatioanl disease) Convention, 1934 ILO convention C048 – Maintanance of Migrants' Pension Rights Convention, 1935 ILO convention C118 - Equality of Treatment (Social Security) Convention, 1962 And many others related partially to this matter, see: https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO The Civil Code provides for a statutory minimum leave of eight days, for domestic workers only. Minimum leave of all other workers is determined by collective agreements, which generally provide for paid annual leave of not less than four weeks per year. Some agreements foresee additional vacation on the ground of seniority. During their vacation, employees receive normal pay, excluding only indemnities connected to the actual work. Italy ratified the ILO Holidays with Pay Convention (Revised), 1970 (no. 132) which provides for a minimum leave of not less than three working weeks for one year of service. Maternity leave (and also paternity leave) is a right for every women or men; during compulsory maternity leave, the mother is entitled to 80% of her regular pay from Social Security and the period is counted as actual work time. Collective agreements usually oblige the employer to make up the difference to the regular wage. During sickness, suspension of the contract, with job protection, lasts for periods usually determined by collective agreements, according to the employee's seniority. The average period is about one year. During this time, the worker is fully paid (by the employer or by the Social Security). Beyond this period an employee is usually entitled, under collective agreements, to a further period of unpaid leave.

	Student workers have the right to paid days off work to take exams. Retirement and compensation law and regulations are very detailed and effective in Italy, and are in constant re-negotiations between the Government and the trade unions (CGIL, CISL, UIL and many other small ones), as they are common rights that are very rooted in the public opinion. There are reports, both national and international, about disrespect of workers' rights by employer who illegally employ immigrants in agriculture, but measures are in place (see Indicator 4.16 about the National Action Plan to tackle labour exploitation in agriculture). After that Duferco obliges its suppliers to provide evidence of respecting all labour rights in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Besides, Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions; as it is also ISO 45001 certified, once a year it is audited against that standard about Occupational Health and Safety Management System. Duferco, as ISO 45001 certified enterprise, only contracts suppliers that can provide evidence of legal working conditions for all workers.
Risk Rating	Low Risk

Italy Tuscany	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	- Italian Constitution ("Costituzione") - Italian Civil Code (1942 and further updates) - ILO National labour Law profile: https://www.ilo.org/resource/national-labour-law-profile-italy - ILO conventions - Duferco Biomasse voluntary certifications
Risk Rating justification	In Italy workers have the right to annual paid leave (art. 36 of the Constitution). Italian Constitution Art. 38 states: "Workers shall have the right to envisaged and assured adequate means for their subsistence needs in the event of an accident, illness, disability, old age and involuntary unemployment." Italy ratified the following ILO conventions: ILO convention C012 - Workmen's Compensation (Agriculture) Convention, 1921 ILO convention C038 - Invalidity Insurance (Agriculture) Convention, 1933 ILO convention C040 - Survivors' Insurance (Agriculture) Convention, 1933 ILO convention C042 - Workmen's Compensation (occupatioanl disease) Convention, 1934 ILO convention C048 - Maintanance of Migrants' Pension Rights Convention, 1935 ILO convention C118 - Equality of Treatment (Social Security) Convention, 1962

	And many others related partially to this matter, see: https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO The Civil Code provides for a statutory minimum leave of eight days, for domestic workers only. Minimum leave of all other workers is determined by collective agreements, which generally provide for paid annual leave of not less than four weeks per year. Some agreements foresee additional vacation on the ground of seniority. During their vacation, employees receive normal pay, excluding only indemnities connected to the actual work. Italy ratified the ILO Holidays with Pay Convention (Revised), 1970 (no. 132) which provides for a minimum leave of not less than three working weeks for one year of service. Maternity leave (and also paternity leave) is a right for every women or men; during compulsory maternity leave, the mother is entitled to 80% of her regular pay from Social Security and the period is counted as actual work time. Collective agreements usually oblige the employer to make up the difference to the regular wage. During sickness, suspension of the contract, with job protection, lasts for periods usually determined by collective agreements, according to the employee's seniority. The average period is about one year. During this time, the worker is fully paid (by the employer or by the Social Security). Beyond this period an employee is usually entitled, under collective agreements, to a further period of unpaid leave. Student workers have the right to paid days off work to take exams. Retirement and compensation law and regulations are very detailed and effective in Italy, and are in constant re-negotiations between the Government and the trade unions (CGIL, CISL, UIL and many other small ones), as they are common rights that are very rooted in the public opinion. There are reports, both national and international, about disrespect of workers' rights by employer who illegally employ immigrants in agriculture, but measures are in place (see Indicator 4.16 about the National Action Plan to tackle labour exploitation in agriculture). After that Duferco obliges its suppliers to provide evidence of respecting all labour rights in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Besides, Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions; as it is also ISO 45001 certified, once a year it is audited against that standard about Occupational Health and Safety Management System. Duferco, as ISO 45001 certified enterprise, only contracts suppliers that can provide evidence of legal working conditions for all workers. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A.
Risk Rating	Low Risk

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	- Italian Constitution ("Costituzione") - Italian Civil Code (1942 and further updates) - ILO National labour Law profile: https://www.ilo.org/resource/national-labour-law-profile-italy - ILO conventions - Duferco Biomasse voluntary certifications
Risk Rating justification	All workers have the right to annual paid leave (art. 36 of the Constitution). Italian Constitution Art. 38 states: "Workers shall have the right to envisaged and assured adequate means for their subsistence needs in the event of an accident, illness, disability, old age and involuntary unemployment." Italy ratified the following ILO conventions: ILO convention C012 - Workmen's Compensation (Agriculture) Convention, 1921 ILO convention C038 - Invalidity Insurance (Agriculture) Convention, 1933 ILO convention C040 - Survivors' Insurance (Agriculture) Convention, 1933 ILO convention C042 - Workmen's Compensation (occupatioanl disease) Convention, 1934 ILO convention C048 – Maintanance of Migrants' Pension Rights Convention, 1935 ILO convention C118 - Equality of Treatment (Social Security) Convention, 1962 And many others related partially to this matter, see: https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO The Civil Code provides for a statutory minimum leave of eight days, for domestic workers only. Minimum leave of all other workers is determined by collective agreements, which generally provide for paid annual leave of not less than four weeks per year. Some agreements foresee additional vacation on the ground of seniority. During their vacation, employees receive normal pay, excluding only indemnities connected to the actual work. Italy ratified the ILO Holidays with Pay Convention (Revised), 1970 (no. 132) which provides for a minimum leave of not less than three working weeks for one year of service. Maternity leave (and also paternity leave) is a right for every women or men; during compulsory maternity leave, the mother is entitled to 80% of her regular pay from Social Security and the period is counted as actual work time. Collective agreements usually oblige the employer to make up the difference to the regular wage. During sickness, suspension of the contract, with job protection, lasts for periods usually determined by collective agreements, according to the employee's seniority. The average period is about one year. During this time, the worker is fully paid (by the employer or by the Social Security).

	Beyond this period an employee is usually entitled, under collective agreements, to a further period of unpaid leave. Student workers have the right to paid days off work to take exams. Retirement and compensation law and regulations are very detailed and effective in Italy, and are in constant re-negotiations between the Government and the trade unions (CGIL, CISL, UIL and many other small ones), as they are common rights that are very rooted in the public opinion. There are reports, both national and international, about disrespect of workers' rights by employer who illegally employ immigrants in agriculture, but measures are in place (see Indicator 4.16 about the National Action Plan to tackle labour exploitation in agriculture). After that Duferco obliges its suppliers to provide evidence of respecting all labour rights in the felling operations in the field, in the transport and in the port facility, through proper signed contracts and annexes. Besides, Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions; as it is also ISO 45001 certified, once a year it is audited against that standard about Occupational Health and Safety Management System. Duferco, as ISO 45001 certified enterprise, only contracts suppliers that can provide evidence of legal working conditions for all workers.
Risk Rating	Low Risk

Italy Veneto	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	-Duferco Biomasse Internal SBP Handbook and related check documents. -Duferco Biomasse voluntary certifications
Risk Rating justification	Duferco is PEFC, FSC, SBP, ISCC, ISO certified, meaning that it has got a comprehensive training plan for fulfilling the requirements of many certification, as well as mandatory training according to national laws and regulations. Since Duferco Biomasse is ISO 45001 certified, once a year it is audited against that standard about Occupational Health and Safety Management System, that includes relevant training about some aspects of SBP standards too (labour rights, safety devices, etc.). Internal SBP Handbook provides evidence of SBP specific training procedure at section 17 and Annex 1 (Training journal). SBP manager is responsible for providing proper training about SBP standards to involved personnel; records of each training session have been recorded in Annex 1 since 2019, when SBP certification was first achieved. SBP training is usually performed by the certification consultant and by SBP organization through webinars.

	This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A.
Risk Rating	Low Risk

Italy Lombardy	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	-Duferco Biomasse Internal SBP Handbook and related check documents. -Duferco Biomasse voluntary certifications
Risk Rating justification	Duferco is PEFC, FSC, SBP, ISCC, ISO certified, meaning that it has got a comprehensive training plan for fulfilling the requirements of many certification, as well as mandatory training according to national laws and regulations. Since Duferco Biomasse is ISO 45001 certified, once a year it is audited against that standard about Occupational Health and Safety Management System, that includes relevant training about some aspects of SBP standards too (labour rights, safety devices, etc.). Internal SBP Handbook provides evidence of SBP specific training procedure at section 17 and Annex 1 (Training journal). SBP manager is responsible for providing proper training about SBP standards to involved personnel; records of each training session have been recorded in Annex 1 since 2019, when SBP certification was first achieved. SBP training is usually performed by the certification consultant and by SBP organization through webinars. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A.
Risk Rating	Low Risk

Italy Apulia	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	-Duferco Biomasse Internal SBP Handbook and related check documents. -Duferco Biomasse voluntary certifications
Risk Rating justification	Duferco is PEFC, FSC, SBP, ISCC, ISO certified, meaning that it has got a comprehensive training plan for fulfilling the requirements of many certification, as well as mandatory training according to national laws and regulations. Since Duferco Biomasse is ISO 45001 certified, once a year it is audited

	against that standard about Occupational Health and Safety Management System, that includes relevant training about some aspects of SBP standards too (labour rights, safety devices, etc.). Internal SBP Handbook provides evidence of SBP specific training procedure at section 17 and Annex 1 (Training journal). SBP manager is responsible for providing proper training about SBP standards to involved personnel; records of each training session have been recorded in Annex 1 since 2019, when SBP certification was first achieved. SBP training is usually performed by the certification consultant and by SBP organization through webinars.
Risk Rating	Low Risk

Italy Tuscany	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	-Duferco Biomasse Internal SBP Handbook and related check documents. -Duferco Biomasse voluntary certifications
Risk Rating justification	Duferco is PEFC, FSC, SBP, ISCC, ISO certified, meaning that it has got a comprehensive training plan for fulfilling the requirements of many certification, as well as mandatory training according to national laws and regulations. Since Duferco Biomasse is ISO 45001 certified, once a year it is audited against that standard about Occupational Health and Safety Management System, that includes relevant training about some aspects of SBP standards too (labour rights, safety devices, etc.). Internal SBP Handbook provides evidence of SBP specific training procedure at section 17 and Annex 1 (Training journal). SBP manager is responsible for providing proper training about SBP standards to involved personnel; records of each training session have been recorded in Annex 1 since 2019, when SBP certification was first achieved. SBP training is usually performed by the certification consultant and by SBP organization through webinars. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A.
Risk Rating	Low Risk

Italy Emilia-Romagna	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	-Duferco Biomasse Internal SBP Handbook and related check documents.

	-Duferco Biomasse voluntary certifications
Risk Rating justification	Duferco is PEFC, FSC, SBP, ISCC, ISO certified, meaning that it has got a comprehensive training plan for fulfilling the requirements of many certification, as well as mandatory training according to national laws and regulations. Since Duferco Biomasse is ISO 45001 certified, once a year it is audited against that standard about Occupational Health and Safety Management System, that includes relevant training about some aspects of SBP standards too (labour rights, safety devices, etc.). Internal SBP Handbook provides evidence of SBP specific training procedure at section 17 and Annex 1 (Training journal). SBP manager is responsible for providing proper training about SBP standards to involved personnel; records of each training session have been recorded in Annex 1 since 2019, when SBP certification was first achieved. SBP training is usually performed by the certification consultant and by SBP organization through webinars. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A.
Risk Rating	Low Risk

Italy Lazio	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	-Duferco Biomasse Internal SBP Handbook and related check documents. -Duferco Biomasse voluntary certifications
Risk Rating justification	Duferco is PEFC, FSC, SBP, ISCC, ISO certified, meaning that it has got a comprehensive training plan for fulfilling the requirements of many certification, as well as mandatory training according to national laws and regulations. Since Duferco Biomasse is ISO 45001 certified, once a year it is audited against that standard about Occupational Health and Safety Management System, that includes relevant training about some aspects of SBP standards too (labour rights, safety devices, etc.). Internal SBP Handbook provides evidence of SBP specific training procedure at section 17 and Annex 1 (Training journal). SBP manager is responsible for providing proper training about SBP standards to involved personnel; records of each training session have been recorded in Annex 1 since 2019, when SBP certification was first achieved. SBP training is usually performed by the certification consultant and by SBP organization through webinars. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A.
Risk Rating	Low Risk

Spain 6 regions in East and South Spain	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	-Duferco Biomasse Internal SBP Handbook and related check documents. -Duferco Biomasse voluntary certifications Record of internal and external training carried out for forest workers and sources taken on the risk and safety Law 31/1995 on Preventing Occupational Risks and Regulation of Prevention
Risk Rating justification	Duferco is PEFC, FSC, SBP, ISCC, ISO certified, meaning that it has got a comprehensive training plan for fulfilling the requirements of many certification, as well as mandatory training according to national laws and regulations. Also Duferco's suppliers in Spain are certified under different scheme that includes requirements of training. Since Duferco Biomasse is ISO 45001 certified, once a year it is audited against that standard about Occupational Health and Safety Management System, that includes relevant training about some aspects of SBP standards too (labour rights, safety devices, etc.). Internal SBP Handbook provides evidence of SBP specific training procedure at section 17 and Annex 1 (Training journal). SBP manager is responsible for providing proper training about SBP standards to involved personnel; records of each training session have been recorded in Annex 1 since 2019, when SBP certification was first achieved. SBP training is usually performed by the certification consultant and by SBP organization through webinars. This applies to forest lots and also to operations in the agricultural land related to sourcing feedstock within TOF Group 3A.
Risk Rating	Low Risk

Italy Lombardy	Indicator
4.1.9	Mechanisms shall be in place for resolving grievances and disputes in the workplace.
Supply Base Verifiers	- Italian Civil Code (1942 and further updates) -National Law 533/1973 about "Disputes relating to employment relationships and in matters of social security and compulsory assistance" -National Law decree 80/1998 about "New provisions on organization and working relationships in public administrations, jurisdiction in labor disputes and administrative jurisdiction" -ILO conventions -Duferco Biomasse voluntary certifications
Risk Rating justification	There is a strong legal framework set by the Civil Code and laws, that also

	establish a special legal procedure for these disputes (called “rito speciale”) since 1973. There are 3 levels of judgement in civil process (first grade, appeal and court of cassation) with free access to one level after the other in order, until the part decides to stop or until the ruling of the Cassation Court (“Corte di Cassazione”) that is the upper level. Any worker with a valid contract is allowed to be use this mechanism in place. About illegal workers in agriculture, measures are in place (see Indicator 4.16 about the National Action Plan to tackle labour exploitation in agriculture). Duferco is ISO 45001 certified and only contracts suppliers that can provide evidence of legal working and disputing conditions for all workers. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A.
Risk Rating	Low Risk

Italy Veneto	Indicator
4.1.9	Mechanisms shall be in place for resolving grievances and disputes in the workplace.
Supply Base Verifiers	Italian Civil Code (1942 and further updates) -National Law 533/1973 about “Disputes relating to employment relationships and in matters of social security and compulsory assistance” -National Law decree 80/1998 about “New provisions on organization and working relationships in public administrations, jurisdiction in labor disputes and administrative jurisdiction” -ILO conventions -Duferco Biomasse voluntary certifications
Risk Rating justification	There is a strong legal framework set by the Civil Code and laws, that also establish a special legal procedure for these disputes (called “rito speciale”) since 1973. There are 3 levels of judgement in civil process (first grade, appeal and court of cassation) with free access to one level after the other in order, until the part decides to stop or until the ruling of the Cassation Court (“Corte di Cassazione”) that is the upper level. Any worker with a valid contract is allowed to be use this mechanism in place. About illegal workers in agriculture, measures are in place (see Indicator 4.16 about the National Action Plan to tackle labour exploitation in agriculture). Duferco is ISO 45001 certified and only contracts suppliers that can provide evidence of legal working and disputing conditions for all workers. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A.
Risk Rating	Low Risk

Spain 6 regions in East and South Spain	Indicator
4.1.9	Mechanisms shall be in place for resolving grievances and disputes in the workplace.
Supply Base Verifiers	-ILO conventions - Spanish Civil Code -Duferco Biomasse voluntary certifications
Risk Rating justification	There is a strong legal framework in Spain about grievancies and disputes in the workplace. Grievancies and disputes can be reported to appropriate authorities regulating the issue in question. There are different channels established to address the relevant issues, for example: official appeals, hot lines, e-mails, personal visits of particular authorities. Any worker with a valid contract is allowed to be use this mechanism in place. Duferco is ISO 45001 certified and only contracts suppliers that can provide evidence of legal working and disputing conditions for all workers. This applies to forest lots and also to operations in the agricultural land related to sourcing feedstock within TOF Group 3A.
Risk Rating	Low Risk

Italy Lazio	Indicator
4.1.9	Mechanisms shall be in place for resolving grievances and disputes in the workplace.
Supply Base Verifiers	- Italian Civil Code (1942 and further updates) -National Law 533/1973 about “Disputes relating to employment relationships and in matters of social security and compulsory assistance” -National Law decree 80/1998 about “New provisions on organization and working relationships in public administrations, jurisdiction in labor disputes and administrative jurisdiction” -ILO conventions -Duferco Biomasse voluntary certifications
Risk Rating justification	There is a strong legal framework set by the Civil Code and laws, that also establish a special legal procedure for these disputes (called “rito speciale”) since 1973. There are 3 levels of judgement in civil process (first grade, appeal and court of cassation) with free access to one level after the other in order, until the part decides to stop or until the ruling of the Cassation Court (“Corte di Cassazione”) that is the upper level. Any worker with a valid contract is allowed to be use this mechanism in place. About illegal workers in agriculture, measures are in place (see Indicator 4.16 about the National Action Plan to tackle labour exploitation in

	agriculture). Duferco is ISO 45001 certified and only contracts suppliers that can provide evidence of legal working and disputing conditions for all workers. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A.
Risk Rating	Low Risk

Italy Emilia-Romagna	Indicator
4.1.9	Mechanisms shall be in place for resolving grievances and disputes in the workplace.
Supply Base Verifiers	-National Law 533/1973 about “Disputes relating to employment relationships and in matters of social security and compulsory assistance” -National Law decree 80/1998 about “New provisions on organization and working relationships in public administrations, jurisdiction in labor disputes and administrative jurisdiction” -ILO conventions -Duferco Biomasse voluntary certifications
Risk Rating justification	There is a strong legal framework set by the Civil Code and laws, that also establish a special legal procedure for these disputes (called “rito speciale”) since 1973. There are 3 levels of judgement in civil process (first grade, appeal and court of cassation) with free access to one level after the other in order, until the part decides to stop or until the ruling of the Cassation Court (“Corte di Cassazione”) that is the upper level. Any worker with a valid contract is allowed to be use this mechanism in place. About illegal workers in agriculture, measures are in place (see Indicator 4.16 about the National Action Plan to tackle labour exploitation in agriculture). Duferco is ISO 45001 certified and only contracts suppliers that can provide evidence of legal working and disputing conditions for all workers. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A.
Risk Rating	Low Risk

Italy Tuscany	Indicator
4.1.9	Mechanisms shall be in place for resolving grievances and disputes in the workplace.
Supply Base Verifiers	- Italian Civil Code (1942 and further updates) -National Law 533/1973 about “Disputes relating to employment relationships and in matters of social security and compulsory assistance” -National Law decree 80/1998 about “New provisions on organization and working relationships in public administrations, jurisdiction in labor disputes

	and administrative jurisdiction” -ILO conventions -Duferco Biomasse voluntary certifications
Risk Rating justification	There is a strong legal framework set by the Civil Code and laws, that also establish a special legal procedure for these disputes (called “rito speciale”) since 1973. There are 3 levels of judgement in civil process (first grade, appeal and court of cassation) with free access to one level after the other in order, until the part decides to stop or until the ruling of the Cassation Court (“Corte di Cassazione”) that is the upper level. Any worker with a valid contract is allowed to be use this mechanism in place. About illegal workers in agriculture, measures are in place (see Indicator 4.16 about the National Action Plan to tackle labour exploitation in agriculture). Duferco is ISO 45001 certified and only contracts suppliers that can provide evidence of legal working and disputing conditions for all workers. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A.
Risk Rating	Low Risk

Italy Apulia	Indicator
4.1.9	Mechanisms shall be in place for resolving grievances and disputes in the workplace.
Supply Base Verifiers	- Italian Civil Code (1942 and further updates) -National Law 533/1973 about “Disputes relating to employment relationships and in matters of social security and compulsory assistance” -National Law decree 80/1998 about “New provisions on organization and working relationships in public administrations, jurisdiction in labor disputes and administrative jurisdiction” -ILO conventions -Duferco Biomasse voluntary certifications
Risk Rating justification	There is a strong legal framework set by the Civil Code and laws, that also establish a special legal procedure for these disputes (called “rito speciale”) since 1973. There are 3 levels of judgement in civil process (first grade, appeal and court of cassation) with free access to one level after the other in order, until the part decides to stop or until the ruling of the Cassation Court (“Corte di Cassazione”) that is the upper level. Any worker with a valid contract is allowed to be use this mechanism in place.

	About illegal workers in agriculture, measures are in place (see Indicator 4.16 about the National Action Plan to tackle labour exploitation in agriculture). Duferco is ISO 45001 certified and only contracts suppliers that can provide evidence of legal working and disputing conditions for all workers.
Risk Rating	Low Risk

Italy Apulia	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	ILO conventions ISO 45001 standard about Occupational Health and Safety Management System FSC Standards
Risk Rating justification	Italy ratified the following ILO conventions: ILO convention C119 - Guarding of Machinery Convention), 1963; ILO convention C148 - Working Environment (Air Pollution, Noise and Vibration) Convention, 1977; ILO convention C170 - Chemicals Convention, 1990. Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions. Duferco is ISO 45001 certified and only contracts suppliers that can provide evidence of legal working conditions for all workers. Once a year Duferco Biomasse is also audited against that ISO 45001 standard about Occupational Health and Safety Management System, including policies and procedures.
Risk Rating	Low Risk

Italy Tuscany	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	ILO CONVENTIONS ISO 45001 standard about Occupational Health and Safety Management System FSC Standards
Risk Rating justification	Italy ratified the following ILO conventions: ILO convention C119 - Guarding of Machinery Convention), 1963; ILO convention C148 - Working Environment (Air Pollution, Noise and

	Vibration) Convention, 1977; ILO convention C170 - Chemicals Convention, 1990. Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions. Duferco is ISO 45001 certified and only contracts suppliers that can provide evidence of legal working conditions for all workers. Once a year Duferco Biomasse is also audited against that ISO 45001 standard about Occupational Health and Safety Management System, including policies and procedures. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A. Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Low Risk

Italy Emilia-Romagna	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	ILO CONVENTIONS ISO 45001 standard about Occupational Health and Safety Management System FSC Standards
Risk Rating justification	Italy ratified the following ILO conventions: ILO convention C119 - Guarding of Machinery Convention), 1963; ILO convention C148 - Working Environment (Air Pollution, Noise and Vibration) Convention, 1977; ILO convention C170 - Chemicals Convention, 1990. Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions. Duferco is ISO 45001 certified and only contracts suppliers that can provide evidence of legal working conditions for all workers. Once a year Duferco Biomasse is also audited against that ISO 45001 standard about Occupational Health and Safety Management System, including policies and procedures. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A. Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Low Risk

Italy Lazio	Indicator
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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	ILO CONVENTIONS ISO 45001 standard about Occupational Health and Safety Management System FSC Standards
Risk Rating justification	Italy ratified the following ILO conventions: ILO convention C119 - Guarding of Machinery Convention), 1963; ILO convention C148 - Working Environment (Air Pollution, Noise and Vibration) Convention, 1977; ILO convention C170 - Chemicals Convention, 1990. Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions. Duferco is ISO 45001 certified and only contracts suppliers that can provide evidence of legal working conditions for all workers. Once a year Duferco Biomasse is also audited against that ISO 45001 standard about Occupational Health and Safety Management System, including policies and procedures. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A. Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Low Risk

Spain 6 regions in East and South Spain	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	ILO conventions Spanish law enforcement ISO 45001 standard about Occupational Health and Safety Management System FSC Standards
Risk Rating justification	Spain ratified the ILO conventions regarding this matter. ILO convention C119 - Guarding of Machinery Convention); ILO convention C148 - Working Environment (Air Pollution, Noise and Vibration) Convention; ILO convention C170 - Chemicals Convention. The following laws regulate the issue of security and health in the forest sector: Law on Prevention of Occupational Risks and Regulation of Prevention Services As for any labour activity, Law 31/1995 of November 8, modified by Law 54/2003, is applicable, which legally regulates the basic framework for the

protection of the safety and health of workers against the risks arising from work. On the other hand, it is also necessary to indicate the application to forestry work of the Regulation of Prevention Services (Royal Decree 39/1997, of January 17), and the modifications introduced to it by Royal Decree 780/1998, of 30 April, and by Royal Decree 604/2006, of May 19. Regulations for the development of the Law on the Prevention of Occupational Risks

The regulations that emanate from the aforementioned Law 31/1995 and from Law 54/2003 that modify it, developed by various regulatory standards, in accordance with article 6 of said law, are applicable to forestry operations, although one must highlight a very important exclusion such as Royal Decree 486/1997, of 14 April, which establishes the minimum health and safety provisions in workplaces, since the fields of cultivation, forests and other lands that are part of a company or centre of agricultural or forestry work, but that are located outside the built zone of the same.

R.D. 1215/1997, of 18 July, on minimum safety and health provisions for the use by workers of work equipment, in terms of the use by workers of equipment such as tractors, processors, etc..

Royal Decree 773/1997, of May 30, on minimum health and safety regulations regarding the use by workers of personal protective equipment.

The concept of occupational accidents refers to the production of work accidents and occupational diseases linked to the exercise of a professional activity. The forestry sector is, after the construction sector, the one with the highest rate of occupational accidents and occupational diseases.

A more detailed analysis of the main sources of accidents in forestry work reveals that the forestry exploitation phase and, more specifically, the felling, felling and cutting with chainsaws are the forestry activities with the highest accident rate.

The use of the chainsaw, which is a widespread tool in rural areas, causes 18% of accidents.

According to International Labour Organization, there have been an increase in fatal and non-fatal injuries related to agriculture, forestry and fishing sector in Spain.

All companies have the obligation to have a contracted with a mutual insurance company which is entrusted to:

- Annual medical review of all workers;
- Annual training for all workers on occupational health and safety, specific training for each workplace.

In case of accident, evaluation of the same and corrective measures to avoid a repetition.

Issue a certificate to be aware of compliance with all legislation related to occupational health and safety.

In addition, random government technicians make on-site inspections to verify that all workers wear the PPE and all regulations are complied with. Forest Police is checking ongoing harvesting operations without preliminary notice.

Safeguards are in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures,

	defined by detailed legislation, besides Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions. Duferco is ISO 45001 certified and only contracts suppliers that can provide evidence of legal working conditions for all workers. Once a year Duferco Biomasse is also audited against that ISO 45001 standard about Occupational Health and Safety Management System, including policies and procedures. This applies to forest lots and also to operations in the agricultural land related to sourcing feedstock within TOF Group 3A.
Risk Rating	Low Risk

Italy Veneto	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	ILO CONVENTIONS ISO 45001 standard about Occupational Health and Safety Management System FSC Standards
Risk Rating justification	Italy ratified the following ILO conventions: ILO convention C119 - Guarding of Machinery Convention), 1963; ILO convention C148 - Working Environment (Air Pollution, Noise and Vibration) Convention, 1977; ILO convention C170 - Chemicals Convention, 1990. Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions. Duferco is ISO 45001 certified and only contracts suppliers that can provide evidence of legal working conditions for all workers. Once a year Duferco Biomasse is also audited against that ISO 45001 standard about Occupational Health and Safety Management System, including policies and procedures. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A. Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Low Risk

Italy Lombardy	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	ILO CONVENTIONS

	ISO 45001 standard about Occupational Health and Safety Management System FSC Standards
Risk Rating justification	Italy ratified the following ILO conventions: ILO convention C119 - Guarding of Machinery Convention), 1963; ILO convention C148 - Working Environment (Air Pollution, Noise and Vibration) Convention, 1977; ILO convention C170 - Chemicals Convention, 1990. Duferco is FSC certified and provides evidence annually to the CB about respect of ILO Conventions. Duferco is ISO 45001 certified and only contracts suppliers that can provide evidence of legal working conditions for all workers. Once a year Duferco Biomasse is also audited against that ISO 45001 standard about Occupational Health and Safety Management System, including policies and procedures. This applies to forest lots and also to operations in the agricultural land or landscape related to sourcing feedstock within TOF Group 2A and 3A. Forest sites and TOF lots are visited in order to fill in technical evaluations about sourcing in a report (Annex 5), that provides evidence of compliance to all requirements.
Risk Rating	Low Risk

Spain 6 regions in East and South Spain	Indicator
4.2.1	Negative social and community impacts shall be identified and avoided.
Supply Base Verifiers	Law enforcement about impact assessment: Ley 21/2013, de 9 de diciembre, de evaluación Ambiental Environmental associations surveillance
Risk Rating justification	Local authorities issue felling licence and other authorizations and Rural Police and SEPRONA check works on the field. Environmental associations, collecting feedback from stakeholders (neighbours, environmental associations, other local associations) are present and very strong at local level. They monitor and act as stakeholder in any activity in the field, immediately reporting on social media about any possible impact. Since the legal framework is strong and checkings are made both from authorities and local stakeholders, the risk that impact happens and goes undetected is very low. This applies to forest lots and also to operations in the agricultural land related to sourcing feedstock within TOF Group 3A.
Risk Rating	Low Risk

Italy Lazio	Indicator
4.2.1	Negative social and community impacts shall be identified and avoided.
Supply Base Verifiers	Law Decree n. 152/2006 https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:decreto.legislativo:2006-04-03;152 Protection of nature association: https://www.legambiente.it/chi-siamo/
Risk Rating justification	Law enforcement about impact assessment is very strong in Italy, thanks to Law Decree n. 152/2006 ("Decreto legislativo 3 aprile 2006, n. 152 Norme in materia Ambientale"). Local authorities issue felling licence and other authorizations and Rangers (Carabinieri Forestale) check works on the field, collecting feedback from stakeholders (neighbours, environmental associations, other local associations). Environmental associations are present and very strong at local level (for instance Legambiente), they monitor and act as stakeholder in any activity in the field, immediately reporting on social media about any possible impact. Since the legal framework is strong and checkings are made both from authorities and local stakeholders, the risk that impact happens and goes undetected is very low. This applies also to operations in the agricultural land or landscape related to sourcing feedstock within Group 2A and 3A. Rural police is represented by Gruppo Carabinieri Forestale, who monitor operations in the forests but also in agricultural land or urban land related to TOF sourcing, as they oversee any matter related to trees and environment.
Risk Rating	Low Risk

Italy Emilia-Romagna	Indicator
4.2.1	Negative social and community impacts shall be identified and avoided.
Supply Base Verifiers	Law Decree n. 152/2006 https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:decreto.legislativo:2006-04-03;152
Risk Rating justification	Law enforcement about impact assessment is very strong in Italy, thanks to Law Decree n. 152/2006 ("Decreto legislativo 3 aprile 2006, n. 152 Norme in materia Ambientale"). Local authorities issue felling licence and other authorizations and Rangers (Carabinieri Forestale) check works on the field, collecting feedback from stakeholders (neighbours, environmental associations, other local associations). Environmental associations are present and very strong at local level (for instance Legambiente), they monitor and act as stakeholder in any activity in

	the field, immediately reporting on social media about any possible impact. Since the legal framework is strong and checkings are made both from authorities and local stakeholders, the risk that impact happens and goes undetected is very low. This applies also to operations in the agricultural land or landscape related to sourcing feedstock within Group 2A and 3A. Rural police is represented by Gruppo Carabinieri Forestale, who monitor operations in the forests but also in agricultural land or urban land related to TOF sourcing, as they oversee any matter related to trees and environment.
Risk Rating	Low Risk

Italy Tuscany	Indicator
4.2.1	Negative social and community impacts shall be identified and avoided.
Supply Base Verifiers	Law Decree n. 152/2006 https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:decreto.legislativo:2006-04-03;152
Risk Rating justification	Law enforcement about impact assessment is very strong in Italy, thanks to Law Decree n. 152/2006 ("Decreto legislativo 3 aprile 2006, n. 152 Norme in materia Ambientale"). Local authorities issue felling licence and other authorizations and Rangers (Carabinieri Forestale) check works on the field, collecting feedback from stakeholders (neighbours, environmental associations, other local associations). Environmental associations are present and very strong at local level (for instance Legambiente), they monitor and act as stakeholder in any activity in the field, immediately reporting on social media about any possible impact. Since the legal framework is strong and checkings are made both from authorities and local stakeholders, the risk that impact happens and goes undetected is very low. This applies also to operations in the agricultural land or landscape related to sourcing feedstock within Group 2A and 3A. Rural police is represented by Gruppo Carabinieri Forestale, who monitor operations in the forests but also in agricultural land or urban land related to TOF sourcing, as they oversee any matter related to trees and environment.
Risk Rating	Low Risk

Italy Apulia	Indicator
4.2.1	Negative social and community impacts shall be identified and avoided.
Supply Base Verifiers	-Ministry of Agricultural, Food and Forestry Policies Decree n. 2484/2020. -Rural Development Plan, Puglia Region, Measure 5.1.A and 5.2

Risk Rating justification	The Decree n. 2484/2020 identifies the impacts and provides funding to many activities in the fight against Xylella, it provides also grants in order to compensate farmers and let them have resources for eradication and re-plantation of infected olive trees. Funding for eradication is provided by the Rural Development Plan, Puglia Region, Measure 5.1.A and 5.2, under commitment to replant with resistant varieties. Xylella is a natural cause and that means the social and community impact is not due to farmers or collectors like Duferco Biomasse. As stated before, containing measures are already in place both by national and regional government, thus the situation of impacts is under strict observation and contrast is implemented in many ways.
Risk Rating	Low Risk

Italy Lombardy	Indicator
4.2.1	Negative social and community impacts shall be identified and avoided.
Supply Base Verifiers	Law Decree n. 152/2006 https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:decreto.legislativo:2006-04-03;152
Risk Rating justification	Law enforcement about impact assessment is very strong in Italy, thanks to Law Decree n. 152/2006 ("Decreto legislativo 3 aprile 2006, n. 152 Norme in materia Ambientale"). Local authorities issue felling licence and other authorizations and Rangers (Carabinieri Forestale) check works on the field, collecting feedback from stakeholders (neighbours, environmental associations, other local associations). Environmental associations are present and very strong at local level (for instance Legambiente), they monitor and act as stakeholder in any activity in the field, immediately reporting on social media about any possible impact. Since the legal framework is strong and checkings are made both from authorities and local stakeholders, the risk that impact happens and goes undetected is very low. This applies also to operations in the agricultural land or landscape related to sourcing feedstock within Group 2A and 3A.
Risk Rating	Low Risk

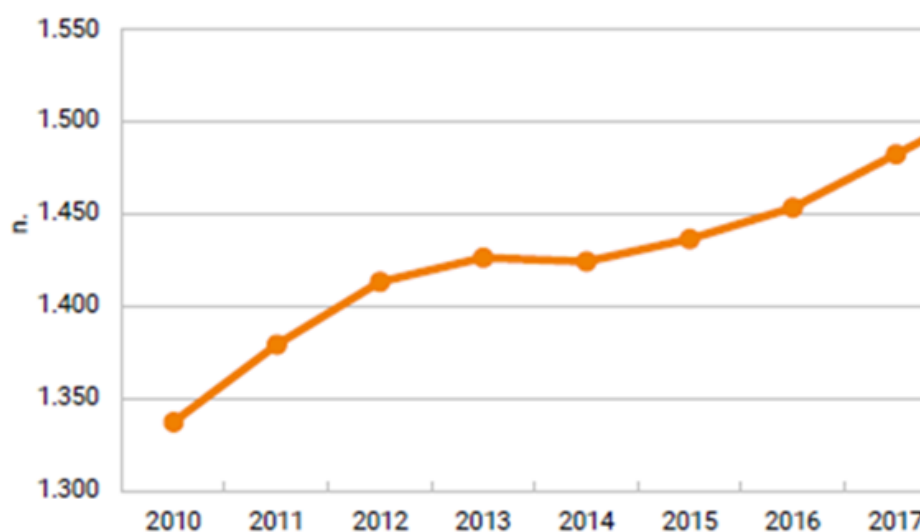
Italy Veneto	Indicator
4.2.1	Negative social and community impacts shall be identified and avoided.
Supply Base Verifiers	Law Decree n. 152/2006

	https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:decreto.legislativo:2006-04-03;152
Risk Rating justification	Law enforcement about impact assessment is very strong in Italy, thanks to Law Decree n. 152/2006 ("Decreto legislativo 3 aprile 2006, n. 152 Norme in materia Ambientale"). Local authorities issue felling licence and other authorizations and Rangers (Carabinieri Forestale) check works on the field, collecting feedback from stakeholders (neighbours, environmental associations, other local associations). Environmental associations are present and very strong at local level (for instance Legambiente), they monitor and act as stakeholder in any activity in the field, immediately reporting on social media about any possible impact. Since the legal framework is strong and checkings are made both from authorities and local stakeholders, the risk that impact happens and goes undetected is very low. This applies also to operations in the agricultural land or landscape related to sourcing feedstock within Group 2A and 3A.
Risk Rating	Low Risk

Italy Apulia	Indicator
4.2.2	Feedstock sourcing shall positively contribute to the local economy, including employment.
Supply Base Verifiers	- Ministry of Agricultural, Food and Forestry Policies Decree n. 2484/2020. -Regional Law n. 8/2024. "Measures for the protection and valorization of precious olive wood deriving from eradications due to the Xylella bacterium and of the artisanal creations of products bearing the Secular and Monumental Olive Tree of Puglia trademark" -article about infected areas by Edagricole: https://olivoelilio.edagricole.it/attualita/cia-puglia-aree-salento-colpite-da-xylella-tra-zone-svantaggiate/
Risk Rating justification	As the radication of infected plants is an extraordinary corrective measure against the spread of a pest, olive wood can be collected for biomass, integrating the income of farmers, in addition to the grants provided for eradication and re-plantation. Many local enterprises are involved in the eradication works and they have personnel that is employed for this operation; the numbers are huge, since over 20 million trees had been or still have to be eradicated according to a press release by the specialized editor Edagricole. Since early this year, due to the application of Regional Law no. 8/2024, there is also the possibility to supply a local chain of trademark artisanal

	creations from olive wood, that has always been traditionally used for creating object of art and daily use (for instance sculptures, but also chopping boards and bowls). The two uses are not alternative, but can coexist, since only some parts of the bigger trunks of few trees can be used for crafting, all the rest can only be used for biomass (split trunks, defected trunks, roots, branches, small plants). Crafters are a small number at the moment, but may increase due to availability of olive timber.
Risk Rating	Low Risk

Italy Tuscany	Indicator
4.2.2	Feedstock sourcing shall positively contribute to the local economy, including employment.
Supply Base Verifiers	Regional Forestry Law no. 39/2000 https://raccoltanormativa.consiglio.regione.toscana.it/articolo?urndoc=urn:nir:regione.toscana:legge:2000-03-21;39 Report on Forests RAF Tuscany Region https://www.regione.toscana.it/-/presentazione-del-rapporto-sullo-stato-delleforeste-in-toscana Law Decree no. 152/2006 (Consolidated Environmental Act): https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:decreto.legislativo:2006-04-03;152 EU Regulation 2024/1748: https://eur-lex.europa.eu/eli/reg_impl/2024/1748/oj/eng
Risk Rating justification	An effective legislation is in place to guarantee the correct utilization, protection, preservation, implementation and maintenance of all the forestry services related to local communities and employments. The number of Forestry companies in Tuscany been increasing since 2010. See graph below, from 2010 to 2019. Source: RAF - Tuscany Region.



This applies also to TOF Group 3A.
Legislation about soil protection in Italy is provided by Legislative Decree 152/2006 (Consolidated Environmental Act), which details measures to prevent hydrogeological instability and water management that fulfills basic needs of the community. At European level, the 2021 Soil Strategy and the Regulation on Nature Restoration (EU Regulation 2024/1748) provide a framework for protecting, monitoring and restoring soil quality.

Risk Rating	Low Risk
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Italy Emilia-Romagna	Indicator
4.2.2	Feedstock sourcing shall positively contribute to the local economy, including employment.
Supply Base Verifiers	-Regional Law no. 30/1981 "Incentivi per lo sviluppo e la valorizzazione delle risorse forestali, con particolare riferimento al territorio montano " (Incentives for the development and enhancement of forest resources, with particular reference to mountain territory), which established the fundamental principles for forest management and protection in the region. -Legislative Decree no. 34/2018 "Testo unico in materia di foreste e filiere forestali" (Consolidated text on forests and forestry supply chains), which provides the national legal framework. Article 10, paragraph 2 specifically mandates that Regions establish registries or registers of companies that perform forestry work or provide services in the forestry, environmental, silvicultural and forest utilization sectors. -Regional Forestry Regulation no. 3/2018, which entered into force on September 15, 2018, replacing the previous PMPF. -Regional Register of Forestry Companies information:

	https://ambiente.regione.emilia-romagna.it/it/parchi-natura2000/foreste/gestione-forestale/albo-imprese-forestali
Risk Rating justification	Regional legislative framework ensures that forestry activities are conducted in a manner that protects forest ecosystems while supporting sustainable economic development and employment in forest-dependent communities. The Emilia-Romagna Region has established the Regional Register of Forestry Companies (Albo Regionale delle Imprese Forestali) pursuant to Regional Council Resolution n. 1001 of June 20, 2022, which provides the "New Directive for the management of the Regional Register of Forestry Companies." The Register represents an important tool for the sustainable development of the forestry supply chain and serves multiple purposes: -Ensuring that forestry work is carried out by qualified and competent operators -Guaranteeing professional standards in forest management activities -Supporting the development of forestry supply chains for bioeconomy products -Facilitating the traceability of wood and wood products in accordance with EU regulations (EUTR and FLEGT) The Register is regularly updated and maintained by the Regional Department for Protected Areas, Forests and Mountain Areas Development. As of September 2024, the Register has undergone 42 periodic updates (most recent: Directive Determination n. 19209/2024), demonstrating the active and growing nature of the forestry sector in the region. Companies can be registered in different categories based on their operational scope and technical capacity: -Category A: Companies, including individual enterprises or cooperatives, that conduct forestry activities on a continuous or predominant basis -Category C: Agricultural enterprises (as defined by Article 2135 of the Civil Code) registered in the register of agricultural holdings and possessing VAT numbers, with farms located in Emilia-Romagna, operating in both agricultural and forestry sectors
Risk Rating	Low Risk

Italy Lazio	Indicator
4.2.2	Feedstock sourcing shall positively contribute to the local economy, including employment.
Supply Base Verifiers	Association of forestry companies in Lazio: https://energiadallegno.it/nasce-unifol-lassociazione-delle-ditte-boschive-dellazio/ Italy Forest Report -RAF Italia https://www.reterurale.it/flex/cm/pages/ServeBLOB.php/L/IT/IDPagina/19231 Regional Forestry Regulation: https://www.regione.lazio.it/regolamenti-regionali-testo-originale/regolamentoregionale-18-aprile-2005-n-7 Law Decree no. 152/2006 (Consolidated Environmental Act):

	https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:decreto.legislativo:2006-04-03;152 EU Regulation 2024/1748: https://eur-lex.europa.eu/eli/reg_impl/2024/1748/oj/eng
Risk Rating justification	An effective legislation is in place to guarantee the correct utilization, protection, preservation, implementation and maintenance of all the forestry services related to local communities and employments. A list of forestry companies in Lazio is updated by Gruppo Carabinieri Forestale, and includes around 300 companies. A spontaneous association was founded in 2023 in Lazio to gather forestry companies within the Region. This applies also to TOF Group 3A. Legislation about soil protection in Italy is provided by Legislative Decree 152/2006 (Consolidated Environmental Act), which details measures to prevent hydrogeological instability and water management that fulfills basic needs of the community. At European level, the 2021 Soil Strategy and the Regulation on Nature Restoration (EU Regulation 2024/1748) provide a framework for protecting, monitoring and restoring soil quality.
Risk Rating	Low Risk

Spain 6 regions in East and South Spain	Indicator
4.2.2	Feedstock sourcing shall positively contribute to the local economy, including employment.
Supply Base Verifiers	Analysis of the contribution to the local economy. Description of the direct economic value created Records of personnel and jobs created Records of economic activity of Duferco and its suppliers in the selected regions. ASEMFO, Employment and investment study in the forestry sector: http://www.asemfo.org/empresas/asemfo/X_estudio_DEF_web.pdf Statistics on the forestry sector: https://www.mapa.gob.es/es/desarrollorural/estadisticas/Est_Comercio_Exterior.aspx https://www.mapa.gob.es/es/desarrollorural/estadisticas/forestal_aprovechamientos.aspx Forestry economy and foreign trade (2016): https://www.unece.org/fileadmin/DAM/timber/countryinfo/statements/Spain2016.pdf EU Regulation 2024/1748: https://eur-lex.europa.eu/eli/reg_impl/2024/1748/oj/eng Law no. 42/2007 https://www.boe.es/buscar/act.php?id=BOE-A-2007-21490
Risk Rating justification	The activity of the Spanish forestry industry has been considerably affected by the economic crisis, especially by the bursting of the housing bubble. The

data indicate that the industry's activity has been recovering in recent years, since 2012, although it is still a long way off the pre 2008 figures. Within this recovery, bioenergy plays an important role since it is mobilising many resources both for national use and for export, either in the form of chips or pellets. Foreign trade in the forestry sector presents a positive balance from 2012 to 2016.

With regards to economic impacts and employment in the local economy of the Autonomous Communities, timber producing forests are scarce and income comes mainly from other products and services.

Number of forestry companies in 2016:

Region	Amount of forestry related sole proprietorship	Total amount enterprises
Andalucía	276	664
Aragón	83	182
Catalunya	32	85
Castilla-La Mancha	139	316
Valencia	259	373
Murcia	30	80

Source: ASEMFO *Estudio de inversion y empleo en el sector forestal* (reference IEA 912, 2016, original source: Camerdata)

Spain imports most of its wood, and demand is growing. The Forestry Sector has a great potential in the creation of rural employment. The domestic forestry sector should increase and considering the present circumstances, more economic activity could double employment in forestry, from the current 155 000 to around 300 000 jobs. Unemployment is a major problem in Spain (14,55% in 2018).

This data is generated by the following wood logging figures in Spain (2015):

Análisis autonómico de las cortas t frondosas, 201

Comunidades Autónomas	Coníferas (m3 cc)
Andalucía	102,759.32
Aragón	239,234.38
Canarias	728.00
Cantabria	134,623.29
Castilla La Mancha	266,850.00
Castilla y León	2,021,267.41
Cataluña	712,868.30
Comunidad de Madrid	15,339.01
Comunidad Foral de Navarra	307,960.00
Comunidad Valenciana	33,114.72
Extremadura	181,552.38
Galicia	3,523,400.00
Islas Baleares	7,163.05
La Rioja	108,225.00
País Vasco	1,332,606.61
Principado de Asturias	228,024.60
Región de Murcia	2,680.00
ESPAÑA	9,218,396

The population employed in fields related to the forestry sector represented 5.7% of the total employed population in 2016. This percentage has remained fairly constant since 2008. It is expected, that these percentages will increase, because of employment generated by the increased use of sustainable energy, such as biomass, as also a greater enhancement of the multifunctionality of forestry.

This applies also to TOF Group 3A.

At European level, the 2021 Soil Strategy and the Regulation on Nature Restoration (EU Regulation 2024/1748) provide a framework for protecting, monitoring and restoring soil quality.

The protection of natural soils in Spain is mainly regulated by Ley 42/2007 on Natural Heritage and Biodiversity and Ley 7/2022 on contaminated residues and soils. Both laws establish the legal regime to conserve, use and restore natural heritage, including measures to prevent and correct soil contamination and protect biodiversity, although there are other relevant regulations such as the Land Law for sustainable urban development. This applies also to operations in the agricultural land for sourcing TOF..

Risk Rating	Low Risk
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Italy Veneto	Indicator
4.2.2	Feedstock sourcing shall positively contribute to the local economy, including employment.
Supply Base Verifiers	ISTAT (National Institute of Statistics), Veneto: https://www.istat.it/comunicato-territoriale/il-censimento-permanente-della-popolazione-in-veneto-anno-2021/ Regional statistics 2024 https://statistica.regione.veneto.it/Pubblicazioni/RapportoStatistico2024/pdf/volume.pdf
Risk Rating justification	The Wood industries in Veneto are over 8300 (2023 data). Forestry companies are over 300 and employee around 500 workers (but more companies work in Veneto, coming from other Regions (Trentino, Friuli) or States close to the borders (Slovenia, Austria), partially contributing to the huge local demand of timber. Veneto is by far the first Italian region for workers and revenue in the furniture sector; almost half of the production is exported. There are over 3000 sawmills in Veneto that employee around 13500 workers. There are over 2900 furniture industries in Veneto, that employee around 50000 workers; 25% of the Italian production of furniture is made in Veneto. In 2012 a Consortium LegnoVeneto was created by authorities, private forest owners, forestry companies and wood processing companies, with the purpose of enhancing the local wood supply chain. Over the years the Consortium has created business relationships and cooperations in the use of local and certified timber. In this scenario the production of timber is a fundamental and structural contribution to the local economy and also to the Italian GDP ("PIL").
Risk Rating	Low Risk

Italy Lombardy	Indicator
4.2.2	Feedstock sourcing shall positively contribute to the local economy, including employment.
Supply Base Verifiers	Press release Mers Foundation: https://www.fondazionemetes.it/bollettino-statistico-della-fondazione-metes-n

24-ottobre-2025/

Risk Rating justification

In Lombardy there are over 600 companies that source timber, in 3 categories, that employee over 1200 operators:

Tabella 5 – Numerosità imprese del settore “Silvicoltura ed altre attività forestali”

Regione	Silvicoltura ed altre attività forestali (2023)		% su totale IMPRESE nazionale	
	Imprese	Addetti	Imprese	Addetti
Piemonte	321	450	16,1%	10,8%
Valle d'Aosta	1	2	0,1%	0,0%
Liguria	52	64	2,6%	1,5%
Lombardia	266	513	13,3%	12,4%

Tabella 8 – Numerosità imprese del settore “Servizi di supporto alla silvicoltura”

Regione	Servizi di supporto alla silvicoltura (2023)		% su totale nazionale	
	Imprese	Addetti	Imprese	Addetti
Piemonte	52	108	8,8%	6,4%
Valle d'Aosta	0	0	0,0%	0,0%
Liguria	22	61	3,7%	3,6%
Lombardia	68	146	11,5%	8,7%

Tabella 6 – Numerosità imprese del settore “Utili delle aree forestali”

Regione	Utilizzo delle aree forestali (2023)		% su totale IMPRESE nazionale	
	Imprese	Addetti	Imprese	Addetti
Piemonte	248	460	7,4%	5,4%
Valle d'Aosta	9	19	0,3%	0,2%
Liguria	118	173	3,5%	2,0%
Lombardia	273	574	8,2%	6,7%

	They provide feedstock for the wood industries (mainly furniture, but also construction timber), to over 8200 wood employees that employ over 51800, which represents 5% of all Italian production.
Risk Rating	Low Risk

Spain 6 regions in East and South Spain	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	Manuals of good practices in sustainable forest management Authorizations/Felling licences
Risk Rating justification	It is widely accepted among the experts consulted in the development of FSC CW report (including a public workshop conducted by FSC Spain) that forest management activities do not threaten water availability under the conditions described, and that water policy and forest restoration and hydrological protection measures are sufficient safeguards. Regarding this indicator, only protection of headwaters of hydrographic basins in the driest areas of southern and eastern Spain may be considered. These areas normally have protected reforested areas carried out by the state administration and they are protected both by national and regional legislation. In addition, they are usually public forests managed by the administration itself (in fact, these forests are one of the types of forests that can be included in the catalogue of public utility forests). In all cases, forestry operations in these forests require prior specific Authorization and Felling Licences for harvesting. Duferco and its suppliers do not perform any harvesting operations where these authorizations are not available. This applies also to TOF Group 3A.
Risk Rating	Low Risk

Italy Lazio	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	Local forestry engineers engaged on these themes Manuals of good practices in sustainable forest management Authorizations/Felling licences
Risk Rating justification	Local forestry engineers report that forest management activities do not threaten water availability under the conditions of Lazio, and that food policy, water policy and forest restoration and hydrological protection measures are sufficient safeguards for protecting the basic needs of communities.

	In all cases, forestry operations in any forest require prior specific Authorization and Felling Licences for harvesting that always consider these aspects, if any. Duferco and its suppliers do not perform any harvesting operations where these authorizations are not available. This applies also to TOF Group 3A.
Risk Rating	Low Risk

Italy Emilia-Romagna	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	Local forestry engineers engaged on these themes Manuals of good practices in sustainable forest management Authorizations/Felling licence
Risk Rating justification	Local forestry engineers report that forest management activities do not threaten water availability under the conditions of Emilia-Romagna, and that food policy, water policy and forest restoration and hydrological protection measures are sufficient safeguards for protecting the basic needs of communities. In all cases, forestry operations in any forest require prior specific Authorization and Felling Licences for harvesting that always consider these aspects, if any. Duferco and its suppliers do not perform any harvesting operations where these authorizations are not available. This applies also to TOF Group 3A.
Risk Rating	Low Risk

Italy Tuscany	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	Local forestry engineers engaged on these themes Manuals of good practices in sustainable forest management Authorizations/Felling licences
Risk Rating justification	Local forestry engineers report that forest management activities do not threaten water availability under the conditions of Tuscany, and that food policy, water policy and forest restoration and hydrological protection measures are sufficient safeguards for protecting the basic needs of communities. In all cases, forestry operations in any forest require prior specific Authorization and Felling Licences for harvesting that always consider these aspects, if any.

	Duferco and its suppliers do not perform any harvesting operations where these authorizations are not available. This applies also to TOF Group 3A.
Risk Rating	Low Risk

Italy Apulia	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	-Local agronomist engaged on these themes -CREA (National Council of Research in Agriculture) publications on the xylella infection
Risk Rating justification	Xylella fastidiosa is a natural cause and all efforts are aimed to contain the spread of the infection and restore the olive trees cultivated surface as much as possible, both for production of olive oil and olives and for maintaining a traditional landscape. This way also all HCV related to this peculiar agro-ecosystem are maintained (referring to HCV 1, 2, 3, 4 and 5). Basic needs of the community are then both economical and cultural (referring to HCV 6) and also this needs are maintained at the level of number of trees for each Province of Puglia; the number of olive trees can only increase and not decrease due to the national law (No. 144/1951) that protects all olive trees of Italy and to a local commitment that details the protection at provincial level.
Risk Rating	Low Risk

Italy Lombardy	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	Local forestry engineers engaged on these themes Manuals of good practices in sustainable forest management Authorizations/Felling licences
Risk Rating justification	Local forestry engineers report that forest management activities do not threaten water availability under the conditions of Lombardy, and that food policy, water policy and forest restoration and hydrological protection measures are sufficient safeguards for protecting the basic needs of communities. In all cases, forestry operations in any forest require prior specific Authorization and Felling Licences for harvesting that always consider these aspects, if any.

	Duferco and its suppliers do not perform any harvesting operations where these authorizations are not available. This applies also to TOF Group 3A.
Risk Rating	Low Risk

Italy Veneto	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	Local forestry engineers engaged on these themes Manuals of good practices in sustainable forest management Authorizations/Felling licences
Risk Rating justification	Local forestry engineers report that forest management activities do not threaten water availability under the conditions of Veneto, that is a land so rich in water courses and channels. Food policy, water policy and forest restoration and hydrological protection measures are sufficient safeguards for protecting the basic needs of communities. In all cases, forestry operations in any forest require prior specific Authorization and Felling Licences for harvesting that always consider these aspects, if any. Duferco and its suppliers do not perform any harvesting operations where these authorizations are not available. This applies also to TOF Group 3A.
Risk Rating	Low Risk

Italy Apulia	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	-National Law 68/2017 -Regional law 7/1998
Risk Rating justification	Not applicable for TOF, as the use rights called “usi civici” apply in Italy only to forest products, game (from hunting) and wild fish as well as pastures in some mountains, but not agriculture.
Risk Rating	Low Risk

Italy Tuscany	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	National Law 68/2017 -Regional Law no. 27/2014 https://raccoltanormativa.consiglio.regione.toscana.it/articolo?urndoc=urn:nir:regione.toscana:legge:2014-05-23;27 Tuscany forestry report: 6aa370d3-2feb-1e10-a172-f817f1509f8e (regione.toscana.it)
Risk Rating justification	Use rights called “usi civici” apply in Italy to forest products, game (from hunting) and wild fish as well as pastures in some mountains, In Tuscany the so called “usi civici” are equal to 22% of the Tuscan municipalities for almost 34.000 hectares which are represented for the 82 % by woods (the 2,5% of the whole regional forestry surface). Customary rights related to forests exist, but there are no relevant issues or conflicts related to these rights. Besides, an effective legislation is in place to resolve any kind of conflicts related to the forest use rights. There are some forestry associations at local level that carry out important work in the recovery or maintenance of customary uses of forests, but not related to timber (mushroom, touristic tracks, etc.). This applies also to TOF Group 2A (except urban) and 3A, as land tenure rights may include agricultural land and landscape in rare cases in the mountains; in those cases same rules apply for sourcing TOF timber as well as forest lots.
Risk Rating	Low Risk

Italy Emilia-Romagna	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	The national legal framework is provided by: • Law no. 168/2017: "Norme in materia di domini collettivi" (Rules on collective domains), which updated and modernized the regulatory framework for collective property and civic uses At the regional level, Emilia-Romagna has adopted specific legislation to regulate usi civici: • Regional Law no. 35/1977: "Delega di funzioni e compiti amministrativi e tecnici alle comunità montane" (Delegation of administrative and technical functions and tasks to mountain communities), which addresses the administration of civic use properties in mountain areas • Regional Law no. 30/1981: Norms for forestry activities, which includes provisions related to collective forest management • Regional Law no. 11/1988: Regionals parks and regional reserves norms, which includes provisions related to collective forest management • Regional Law no. 22/1991: Concerning the reorganization of civic uses • Regional Law no. 24/1991: Regulation of truffle collection, cultivation and trade in the regional territory and enhancement of the regional truffle heritage

	· Regional Law no. 6/1996: regulation on the collection and marketing of spontaneous epigeal mushrooms in the regional territory. application of law 352 of august 23, 1993. · Regional Law no. 49/1996: Additional provisions on civic uses · Regional Law no. 6/2004: "Disciplina della tutela e valorizzazione del patrimonio di razze e varietà locali di interesse agrario del territorio emiliano-romagnolo" (Regulation for the protection and enhancement of the heritage of local breeds and varieties of agricultural interest in the Emilia-Romagna territory), which includes provisions for collective property management including Partecipanze Agrarie (agricultural partnerships, a specific form of collective property typical of Emilia-Romagna). Sources: - https://agricoltura.regione.emilia-romagna.it/usi-civici-e-riordino-fondario/enti-beni-collettivi/usi-civici-e-riservato-dominio/normativa-regionale - https://agricoltura.regione.emilia-romagna.it/usi-civici-e-riordino-fondario/enti-beni-collettivi
Risk Rating justification	Use rights called "usi civici" (customary rights or civic uses) apply in Italy to forest products, game (from hunting), wild fish, as well as pastures in some mountains and hill areas. In Emilia-Romagna, customary rights exist on forest lands and are regulated by both national and regional legislation. The most common types of usi civici include: · Legnatico: right to collect firewood · Pascolatico or Erbatico: right to graze animals · Fungatico: right to collect mushrooms · Other rights related to the use of natural resources from forests and common lands. Lands subject to civic uses in Emilia-Romagna are managed by various types of collective property entities, each with specific characteristics and territorial distribution: 1. Partecipanze Agrarie (Agricultural Partnerships) Primarily located in the plains of the Bologna province, Partecipanze are ancient collective property institutions with medieval origins. In the Bologna area, there are four active Partecipanze Agrarie: · Sant'Agata Bolognese · San Giovanni in Persiceto · Pieve di Cento · Villa Fontana di Medicina 2. Comunalie: Comunalie are collective property entities typical of mountain areas, particularly widespread in the Parma Apennines. The most significant example is represented by the Consorzio Comunalie Parmensi (Consortium of Parma Commons), established in 1957, which provides technical and administrative services for 30 Comunalie located in the Alta Val Taro (High Taro Valley) area. The Consorzio Comunalie Parmensi manages thousands of forest territory, primarily consisting of: Beech forests (<i>Fagus sylvatica</i>), Chestnut forests (<i>Castanea sativa</i>), Mixed conifer stands. The Emilia-Romagna Region has conducted a comprehensive survey of

	lands subject to usi civici as part of the regional landscape plan (Piano Territoriale Paesistico Regionale - PTPR) adaptation to the Code of Cultural Heritage and Landscape (D.Lgs. 42/2004, Article 142, paragraph 1, letter h). This survey identified: · Municipalities with confirmed presence of civic uses (either verified or to be verified) · Municipalities with certified absence of civic uses (by specific Commissioner's decree of non-existence) · Lands with certain existence and certain extent: situations where it was possible to ascertain both the existence and extent of lands burdened by civic uses through official documents, with parcels precisely identified · Civic uses with certain existence but extent to be verified: situations where the survey confirmed the actual existence but could not precisely identify the areas subject to civic use The comprehensive mapping and documentation of civic uses is maintained by the Regional Department of Agriculture, Hunting and Fishing (Settore Agricoltura, Caccia e Pesca), which has jurisdiction over collective property entities and civic uses. Harvesting permits reflect the existence of tenure rights if any, in order to preserve them.
Risk Rating	Low Risk

Italy Lazio	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	-National Law 168/2017 https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:legge:2017-11-20;168 - Regional Law 1/1986 https://www.consiglio.regione.lazio.it/?vw=leggiregionalidettaglio&id=7679&sv=vigente Lazio region geoportal: https://geoportale.regione.lazio.it/maps/new#/ Lazio region website page: https://www.regione.lazio.it/cittadini/agricoltura/Usi-Civici Italy Forest Report -RAF Italia https://www.reterurale.it/flex/cm/pages/ServeBLOB.php/L/IT/IDPagina/19231
Risk Rating justification	Use rights called “usi civici” apply in Italy to forest products, game (from hunting) and wild fish as well as pastures in some mountains. In Lazio there are “usi civici” upon more than 168.000 hectares (according to RAF Italia), within 48 domains. A map is available online, at the regional geoportal. Customary rights related to forests exist, but there are no relevant issues or conflicts related to these rights. Besides, an effective legislation is in place to resolve any kind of conflicts related to the forest use rights. There are some forestry associations at local level that carry out important work in the

	recovery or maintenance of customary uses of forests, but not related to timber (mushroom, touristic tracks, etc.). Felling licences respect the customary right if present. This applies also to TOF Group 2A (except urban) and 3A, as land tenure rights may include agricultural land and landscape in rare cases in the mountains; in those cases same rules apply for sourcing TOF timber as well as forest lots.
Risk Rating	Low Risk

Spain 6 regions in East and South Spain	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	United Nation Refuge Agency World Directory of Minorities and Indigenous Peoples
Risk Rating justification	There are no indigenous people in Spain, nor minorities that claim exceptional customary, or traditional use rights. In general, some customary rights related to forests exist, but there are no relevant issues or conflicts related to these rights. Besides, an effective legislation is in place to resolve any kind of conflicts related to forest use rights. There are many forestry associations or similar groups at local or regional level that carry out important work in the recovery or maintenance of customary uses of forests. The Spanish forest sector is not associated with violent armed conflicts, including those that threaten national or regional security and/or are linked to military dictatorship. Spain is not subject to international sanctions or bans on timber exports and no sanctioned persons related to the Spanish forestry sector were identified. This applies also to TOF Group 3A, as land tenure rights may include agricultural land and landscape in rare cases; in those cases same rules apply for sourcing TOF timber.
Risk Rating	Low Risk

Italy Veneto	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	-National Law 168/2017 https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:legge:2017;168~art3-com7 -Regional Law no. 52/1978

	https://www.consiglioveneto.it/web/crv/dettaglio-legge?catStruttura=LR&anno=1978&numero=52&tab=vigente - L.R. no. 31/1994 "Norme in materia di usi civici" https://www.consiglioveneto.it/web/crv/dettaglio-legge?catStruttura=LR&anno=1994&numero=31&tab=vigente - L.R. no. 26/1996 "Disciplina delle Regole, delle proprietà collettive dell'altopiano di Asiago e degli antichi beni originari di Grignano Polesine" https://www.consiglioveneto.it/web/crv/dettaglio-legge?catStruttura=LR&anno=1996&numero=26&tab=vigente Veneto region website sections: https://www.regione.veneto.it/web/enti-locali/usi-civici https://www.regione.veneto.it/web/enti-locali/regole Usi civici regional viewer: idt2.regione.veneto.it/identity/webgis/viewer?webgisId=135. Press release by Venteo Region: https://www.regione.veneto.it/static/www/economia-e-sviluppo-montano/usi_civici/Libretto_usi_civici_DEF_07_2016.pdf
Risk Rating justification	Use rights called "usi civici" apply in Italy to forest products, game (from hunting) and wild fish as well as pastures in some mountains. Vneto has got a structural and complicated system of tenure rights that dates back in the past. As for categories, there are three kinds of traditional tenure rights: - "Regole" (literally "Rules"), the most organized, - "Proprietà collettive" ("Collective Properties") - "Usi civici" ("Civic uses"). Each tenure right has got a collective body , a "Council" in charge of administration and managing, including selling of standing trees to source timber. Laws and local regulation, as well as statutes of the tenure right itself, apply to these traditional tenure rights, that are more common in the Alps. The <i>Regole</i> manage agricultural land, forests and pastures, assigning rights of use and products according to customary rules and in compliance with national and regional laws. This applies also to TOF Group 2A (except urban) and 3A, as land tenure rights may include agricultural land and landscape in the mountains; in those cases same rules apply for sourcing TOF timber.
Risk Rating	Low Risk

Italy Lombardy	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	National Law 168/2017 https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:legge:2017;168~art3-com7 Regulation no. 4/2025 (from Regional Law no. 31/2008): https://normelombardia.consiglio.regione.lombardia.it/normelombardia/accessibile/main.aspx?view=showdoc&iddoc=rr002025041600004 Tenure use rights in Lombardy Region website: https://www.regione.lombardia.it/wps/portal/istituzionale/HP/DettaglioPubblicazione/servizi-e-informazioni/enti-e-operatori/agricoltura/boschi-e-foreste/uso-civico https://www.regione.lombardia.it/wps/wcm/connect/46be5528-3ad8-48af-bbe4-9017ced60315/Usi_Civici_Lombardia_colori.pdf?MOD=AJPERES&CACHEID=ROOTWORKSPACE-46be5528-3ad8-48af-bbe4-9017ced60315-p3-ufoR
Risk Rating justification	Use rights called “usi civici” apply in Italy to forest products, game (from hunting) and wild fish as well as pastures in some mountains. In Lombardy “Usi civici” (“Civic uses”) can be found in most provinces, but are more common in the Alps, like in the other North Italian Regions. There is an official list of Usi Civici within each Province. Each tenure use right is ruled by a technical office (“Ufficio tecnico”), that is in charge of the procedure of selling timber, standing trees and non-woody products; all procedure is public, to the best bidder in order to maximize the income for the public authority. Several documents are mandatory and provide clear evidence of compliance to customary rules and applicable laws. This applies also to TOF Group 2A (except urban) and 3A, as land tenure rights may include agricultural land and landscape in the mountains; in those cases same rules apply for sourcing TOF timber.
Risk Rating	Low Risk

Spain 6 regions in East and South Spain	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	- Spanish law enforcement - Cadastre on municipality basis - Spanish Civil Code - Property Register: https://registropropiedad.derecho.com - FSC National Risk Assessment for Spain, FSC CW NRA, 2018
Risk Rating justification	Land tenure and use rights are covered by Spanish law and authorities have implemented tools to record and monitor land tenure and use rights. Since

	ancient times, these rights have had great social and economic relevance, so they are widely developed and recognized. Examples of land tenure and use rights relevant to the Spanish context include, but are not limited to: mapping and marking of public forests, property registration and cadastre, boundaries (such as property markers) on small private properties, etc. There are many civil associations that play an important role in the restoration and maintenance of the different types of property, such as partnership forests (community forests). Any dispute can be reported and end up in civil process, with all levels of judgements guarantee by the Civil Code. This applies to forests and also to operations in any land related to sourcing feedstock of TOF.
Risk Rating	Low Risk

Italy Lazio	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	-The Constitution of the Italian Republic (Article 42) which states the right to private Property but also the power of the State, that may set limitations to assure the social function of private property or the public interest. -Rural Cadastre ("Catasto Terreni") on municipality basis -Property Registry Office ("Ufficio del Registro", now under the "Agenzia delle Entrate") on multi-municipality basis -Italian Civil Code (6 books, 1942 and further updates)
Risk Rating justification	Private property is well identified and regulated in Italy, detailing location, surfaces and owners. The Italian Civil Code provides detailed regulations for appealing in any matter, including disputes that may occur in land management practises such as forestry works. There are 3 levels of judgement in civil process (first grade, appeal and court of cassation) with free access to one level after the other in order, until the part decides to stop or until the ruling of the Cassation Court ("Corte di Cassazione") that is the upper level. This applies to forests and also to operations in any land related to sourcing feedstock within TOF Group 2A and 3A.
Risk Rating	Low Risk

Italy Emilia-Romagna	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	-The Constitution of the Italian Republic (Article 42) which states the right to

	private Property but also the power of the State, that may set limitations to assure the social function of private property or the public interest. -Rural Cadastre (“Catasto Terreni”) on municipality basis -Property Registry Office (“Ufficio del Registro”, now under the “Agenzia delle Entrate”) on multi-municipality basis -Italian Civil Code (6 books, 1942 and further updates)
Risk Rating justification	Private property is well identified and regulated in Italy, detailing location, surfaces and owners. The Italian Civil Code provides detailed regulations for appealing in any matter, including disputes that may occur in land management practises such as forestry works. There are 3 levels of judgement in civil process (first grade, appeal and court of cassation) with free access to one level after the other in order, until the part decides to stop or until the ruling of the Cassation Court (“Corte di Cassazione”) that is the upper level. This applies to forests and also to operations in any land related to sourcing feedstock within TOF Group 2A and 3A.
Risk Rating	Low Risk

Italy Tuscany	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	The Constitution of the Italian Republic (Article 42) which states the right to private Property but also the power of the State, that may set limitations to assure the social function of private property or the public interest. -Rural Cadastre (“Catasto Terreni”) on municipality basis -Property Registry Office (“Ufficio del Registro”, now under the “Agenzia delle Entrate”) on multi-municipality basis -Italian Civil Code (6 books, 1942 and further updates)
Risk Rating justification	Private property is well identified and regulated in Italy, detailing location, surfaces and owners. The Italian Civil Code provides detailed regulations for appealing in any matter, including disputes that may occur in land management practises such as eradication of olive trees. There are 3 levels of judgement in civil process (first grade, appeal and court of cassation) with free access to one level after the other in order, until the parts decide to stop or until the ruling of the Cassation Court (“Corte di Cassazione”), that is the upper level, is achieved. This applies to forests and also to operations in any land related to sourcing feedstock within TOF Group 2A and 3A.
Risk Rating	Low Risk

Italy Apulia	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	The Constitution of the Italian Republic (Article 42) which states the right to private Property but also the power of the State, that may set limitations to assure the social function of private property or the public interest. Rural Cadastre ("Catasto Terreni") on municipality basis Property Registry Office ("Ufficio del Registro", now under the "Agenzia delle Entrate") on multi-municipality basis Italian Civil Code (6 books, 1942 and further updates)
Risk Rating justification	Private property is well identified and regulated in Italy, detailing location, surfaces and owners. The Italian Civil Code provides detailed regulations for appealing in any matter, including disputes that may occur in land management practises such as eradication of olive trees. There are 3 levels of judgement in civil process (first grade, appeal and court of cassation) with free access to one level after the other in order, until the parts decide to stop or until the ruling of the Cassation Court ("Corte di Cassazione"), that is the upper level, is achieved.
Risk Rating	Low Risk

Italy Lombardy	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	-The Constitution of the Italian Republic (Article 42) which states the right to private Property but also the power of the State, that may set limitations to assure the social function of private property or the public interest. -Rural Cadastre ("Catasto Terreni") on municipality basis -Property Registry Office ("Ufficio del Registro", now under the "Agenzia delle Entrate") on multi-municipality basis -Italian Civil Code (6 books, 1942 and further updates)
Risk Rating justification	Private property is well identified and regulated in Italy, detailing location, surfaces and owners. The Italian Civil Code provides detailed regulations for appealing in any matter, including disputes that may occur in land management practises such as forestry works. There are 3 levels of judgement in civil process (first grade, appeal and court of cassation) with free access to one level after the other in order, until the part decides to stop or until the ruling of the Cassation Court ("Corte di Cassazione") that is the upper level.

	This applies to forests and also to operations in any land related to sourcing feedstock within TOF Group 2A and 3A.
Risk Rating	Low Risk

Italy Veneto	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	-The Constitution of the Italian Republic (Article 42) which states the right to private Property but also the power of the State, that may set limitations to assure the social function of private property or the public interest. -Rural Cadastre ("Catasto Terreni") on municipality basis -Property Registry Office ("Ufficio del Registro", now under the "Agenzia delle Entrate") on multi-municipality basis -Italian Civil Code (6 books, 1942 and further updates)
Risk Rating justification	Private property is well identified and regulated in Italy, detailing location, surfaces and owners. The Italian Civil Code provides detailed regulations for appealing in any matter, including disputes that may occur in land management practises such as forestry works. There are 3 levels of judgement in civil process (first grade, appeal and court of cassation) with free access to one level after the other in order, until the part decides to stop or until the ruling of the Cassation Court ("Corte di Cassazione") that is the upper level. This applies to forests and also to operations in any land related to sourcing feedstock within TOF Group 2A and 3A.
Risk Rating	Low Risk

Italy Veneto	Indicator
4.2.6	Where Indigenous Peoples' rights are identified in the Supply Base, and Free Prior and Informed Consent (FPIC) has not been achieved for the proposed and planned activities, a consultation and, if required, accommodation process shall be put in place.
Supply Base Verifiers	United Nation Refuge Agency World Directory of Minorities and Indigenous Peoples
Risk Rating justification	The Ladins are identified in the UNHCR archive as a linguistic community, but they do not have traditional tenure rights.
Risk Rating	Low Risk

Italy Lombardy	Indicator
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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	United Nation Refuge Agency World Directory of Minorities and Indigenous Peoples
Risk Rating justification	Not applicable as there are no indigenous people in Lombardy.
Risk Rating	Low Risk

Italy Apulia	Indicator
4.2.6	Where Indigenous Peoples' rights are identified in the Supply Base, and Free Prior and Informed Consent (FPIC) has not been achieved for the proposed and planned activities, a consultation and, if required, accommodation process shall be put in place.
Supply Base Verifiers	United Nation Refuge Agency World Directory of Minorities and Indigenous Peoples - Italy : Albanians https://www.refworld.org/reference/countryrep/mrgi/2018/en/65096
Risk Rating justification	According to UNHCR, groups of Albanians are reported living within the Provinces of Foggia and Taranto. They are indeed Italian citizens that have the same rights of all Italians about properties and other aspects of agriculture. Some municipal authorities support cultural and linguistic activities promoted by the ethnic Albanian communities and have set up bilingual road signs. As Albanians are not indigenous communities with civil rights separated from the other population of Italy, there is no need of FPIC about any activity in the field regarding the eradication of olive trees on private properties.
Risk Rating	Low Risk

Italy Tuscany	Indicator
4.2.6	Where Indigenous Peoples' rights are identified in the Supply Base, and Free Prior and Informed Consent (FPIC) has not been achieved for the proposed and planned activities, a consultation and, if required, accommodation process shall be put in place.
Supply Base Verifiers	United Nation Refuge Agency World Directory of Minorities and Indigenous Peoples
Risk Rating justification	Not applicable as there are no indigenous people in Tuscany.
Risk Rating	Low Risk

Italy Emilia-Romagna	Indicator
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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	United Nation Refuge Agency World Directory of Minorities and Indigenous Peoples
Risk Rating justification	Not applicable as there are no indigenous people in Emilia-Romagna.
Risk Rating	Low Risk

Italy Lazio	Indicator
4.2.6	Where Indigenous Peoples' rights are identified in the Supply Base, and Free Prior and Informed Consent (FPIC) has not been achieved for the proposed and planned activities, a consultation and, if required, accommodation process shall be put in place.
Supply Base Verifiers	United Nation Refuge Agency World Directory of Minorities and Indigenous Peoples
Risk Rating justification	Not applicable as there are no indigenous people in LAZIO.
Risk Rating	Low Risk

Spain 6 regions in East and South Spain	Indicator
4.2.6	Where Indigenous Peoples' rights are identified in the Supply Base, and Free Prior and Informed Consent (FPIC) has not been achieved for the proposed and planned activities, a consultation and, if required, accommodation process shall be put in place.
Supply Base Verifiers	United Nation Refuge Agency World Directory of Minorities and Indigenous Peoples
Risk Rating justification	Not applicable as there are no indigenous people in Spain with rights related to the forests.
Risk Rating	Low Risk

Spain 6 regions in East and South Spain	Indicator
4.2.7	Designated cultural heritage sites shall be preserved.
Supply Base Verifiers	Unesco World Heritage List (by country): https://whc.unesco.org/en/list/&search=&searchSites=&search_by_country=&search_yearinscribed=&themes=&criteria_restriction=&media=&description=&order=country&type=
Risk Rating justification	There are several cultural heritage sites in Spain, but only 2 are included in the Supply Base (Doñana in Andalucia, Mont Perdu in Aragon).

	Forestry operations in these forests, if any, require prior specific Authorization and Felling Licences for harvesting with detailed restrictions and strict supervision by public authorities. Duferco and its suppliers do not perform any harvesting operations where these authorizations are not available and strictly respected. This applies to forests and also to operations in any land related to sourcing feedstock of TOF.
Risk Rating	Low Risk

Italy Lazio	Indicator
4.2.7	Designated cultural heritage sites shall be preserved.
Supply Base Verifiers	Unesco World Heritage List (by country): https://whc.unesco.org/en/list/&search=&searchSites=&search_by_country=&search_yearinscribed=&themes=&criteria_restriction=&media=&description=&order=country&type= https://whc.unesco.org/en/list/1133 https://lazio.cultura.gov.it/?page_id=6836
Risk Rating justification	In Lazio, beyond several UNESCO cultural sites, there are two natural sites part of a transnational property: Ancient and Primeval Beech Forests of the Carpathians and Other Regions of Europe, one sets in Monte Raschio and the other in Monte Cimino. In these sites any kind of human activity is forbidden. This applies to forests and also to operations in any land related to sourcing feedstock within TOF Group 2A and 3A.
Risk Rating	Low Risk

Italy Emilia-Romagna	Indicator
4.2.7	Designated cultural heritage sites shall be preserved.
Supply Base Verifiers	Unesco World Heritage List (by country): https://whc.unesco.org/en/list/&search=&searchSites=&search_by_country=&search_yearinscribed=&themes=&criteria_restriction=&media=&description=&order=country&type=
Risk Rating justification	In Emilia-Romagna, beyond the numerous UNESCO cultural sites, there are two natural sites that are geological sites (caves), of no importance for wood sourcing.
Risk Rating	Low Risk

Italy Tuscany	Indicator
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4.2.7	Designated cultural heritage sites shall be preserved.
Supply Base Verifiers	Unesco World Heritage List (by country): https://whc.unesco.org/en/list/&search=&searchSites=&search_by_country=&search_yearinscribed=&themes=&criteria_restriction=&media=&description=&order=country&type=
Risk Rating justification	In Tuscany there are several important cultural sites, but there is only one natural site recognized by UNESCO named Sasso Fratino which is part of the Foreste Casentinesi National Park. https://www.parcoforestecasentinesi.it/it/natura/le-forestepatrimoniodelhumanita In this site any kind of human activity is completely forbidden. This applies to forests and also to operations in any land related to sourcing feedstock within TOF Group 2A and 3A.
Risk Rating	Low Risk

Italy Apulia	Indicator
4.2.7	Designated cultural heritage sites shall be preserved.
Supply Base Verifiers	Unesco World Heritage List (by country): https://whc.unesco.org/en/list/&search=&searchSites=&search_by_country=&search_yearinscribed=&themes=&criteria_restriction=&media=&description=&order=country&type= Unesco Intangible Heritage: https://ich.unesco.org/en/RL/art-of-dry-stone-walling-knowledge-and-techniques-01393 Plain of the Monumental Olive Trees: https://www.reterurale.it/flex/cm/pages/ServeBLOB.php/L/IT/IDPagina/17435 Protected monumental single olive trees: http://www.sit.puglia.it/portal/portale_rete_natura_2000/Documenti/Ulivi%20monumentali
Risk Rating justification	In Apulia 2 forests and also 3 architectural monuments are listed in the Unesco World Heritage list, but no rural land is enlisted. On the other hand, all over Italy Unesco protects dry stone walls, that's why in Apulia a broad area of olive trees groves with dry stone walls was put under close protection measures through the founding of an HCV area named: Plain of the Monumental Olive Trees. There are also official lists of single monumental trees, updated every year by the regional government, that provide cultural tangible memory of the history of the olive farming; this is a punctual protection measure that is far more detailed than a surface protection measure. So far over 347.000 single

	trees are listed and geographically identified by GIS in Apulia. Preservation is then guaranteed.
Risk Rating	Low Risk

Italy Lombardy	Indicator
4.2.7	Designated cultural heritage sites shall be preserved.
Supply Base Verifiers	Identification of UNESCO sites: https://www.regione.lombardia.it/wps/portal/istituzionale/HP/scopri-la-lombardia/patrimonio-unesco/siti-unesco https://www.regione.lombardia.it/wps/portal/istituzionale/HP/scopri-la-lombardia/patrimonio-unesco/man-and-the-biosphere
Risk Rating justification	In Lombardy no UNESCO site was identified about environment, but there are four “Man and biosphere” reserves. The Man and the Biosphere Programme (MAB) is an intergovernmental scientific program launched in 1971 by UNESCO "to promote, on a science-based basis, a balanced relationship between humanity and the environment through the protection of biodiversity and good practices of sustainable development." It establishes cooperation in research and development and in sharing information, knowledge, and experiences. There are 3 main issues: biodiversity loss, climate change, and sustainable development. The MAB platform promotes involvement of scientists in the development of policies regarding the wise use of biodiversity. Forestry operation that may occur in these reserves must apply, attaching a preliminary study to be approved, in which impacts and implementing mitigation measure are detailed and then included in the harvesting permit.
Risk Rating	Low Risk

Italy Veneto	Indicator
4.2.7	Designated cultural heritage sites shall be preserved.
Supply Base Verifiers	Identification of UNESCO sites: https://www.veneto.eu/IT/Unesco/ https://www.dolomitiunesco.info/ (Italian Commission UNESCO website) https://whc.unesco.org/en/list/1237 (official UNESCO WEBSITE, English language) UNESCO strategy for the DOLOMITES: https://whc.unesco.org/en/list/1237/documents/
Risk Rating justification	In Veneto 9 UNESCO sites were identified, but only 1 related to natural spaces, that is the Dolomites peaks. The core zones of Dolomites correspond to high altitude areas (> 1900

	m/asl), untouched by human activities (with the exception of hiking and mountaineering), while the buffer zones are located immediately below the core zones and are home to “traditional” and extensive agricultural-forestry-pastoral activities, as well as a variety of touristic and leisure activities. There is an overall management strategy for the UNESCO site of the Dolomites that has an articulated action plan, focused on the conservation of the geological and landscape integrity: https://www.dolomitiunesco.info/attivita/strategia-complessiva-di-gestione The strategy provides also instructions for the active management of silvo-pastoral areas as part of the landscape. As it does include forests in the buffer zone and reference areas, in felling operations also the UNESCO strategy for the site must be respected, as detailed in the following strategy objective: <i>C4 Promotion of sustainable economies: 1 Restoring high altitude grazing, and strengthening forestry and livestock farming.</i> In the buffer zone, where forests are located, type B tools apply: primarily Park Plans, management plans for SACs and SPAs, combined with spatial planning tools, sector planning (forestry, rural, infrastructure, etc.) and local land planning. In the reference area, where forests are located, type C tools apply: exclusively spatial planning tools (regional territorial plans, provincial town urban planning, territorial coordination plans, etc.) which work in harmony with tools used in the planning of the wider area (inter-municipal town-planning schemes, community territorial plans, etc.). The felling licences and other authorizations take into account all aspects of wood sourcing related to conservation of the landscape of the buffer zones and reference areas. Forestry Rangers Gruppo Carabinieri Forestale supervise all operations in these sites.
Risk Rating	Low Risk

Annex 2: EU RED Supply Base Evaluation

Countries where EU RED Supply Base Evaluation is used	
Country	Spain
Area	6 regions in East and South Spain
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	Every property in Spain must be registered in the Real Estate Cadastre and can be registered voluntary in the Property Register. However registration in the Cadastre is considered enough, since ownership is not a conflict topic. The FSC National Risk Assessment for Spain (2018) states: “Real Estate Cadastre - registration is compulsory and free. The cadastral description includes the physical, legal and economic characteristics of the property: its location, cadastral reference, surface area, use, cultivation, plan, appraisable value and owner.” The Real Estate Cadastre is full of inaccuracies (borders, owners, geometry of the parcels, etc...). However, in general, there are no conflicts on landownership. “Land tenure and use rights are covered by Spanish law and authorities have implemented tools to record and monitor land tenure and use rights. Since ancient times, these rights have had great social and economic relevance, so they are widely developed and recognized. Examples of land tenure and use rights relevant to the Spanish context include, but are not limited to: mapping and marking of public forests, property registration and cadastre, boundaries (such as property markers) on small private properties, etc. Duferco has an additional standard operating procure to avoid conflicts regarding the legality of ownership and land use. As mentioned in indicator 1.1.2, Duferco always demands the Authorization for Harvesting, or approved Forest Management plan for private properties. The Forest Service establishes the ownership right through the cadastre before issuing this document or approving the FM plan. Only if this document is provided, Duferco or its suppliers, sign the contract with the owner. Evidence of compliance is collected for each forest lot within the managing program, including all authorization documents. Means of verification - Cadastre system

	- Cadastral references in harvesting permits and contracts -Harvesting permits or Forest Managements Plan. Risk assessment Low risk
(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	Duferco and its suppliers perform only maintenance operations approved by the state authorities. Most of the forests within the supply base are in high need of maintenance operations. The operations that are being carried out focus on forest stand improvement. In no case clear cuts are made. Selective cuttings and maintenance operations secure the continuity of the forest, improve the quality of the stand, and enable natural forest regeneration. As a result, the net increment of wood within the forest always increases. There is customized checklist filled by personnel in charge that collects evidence for each forest lot that Duferco buys from owner or supplier. Means of verification Authorization of cutting/Management Plan, stocks and growth data National or regional inventories, stocks and growth data. Harvested volume data (Ministry) Risk assessment Low risk
(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grasslands, heathland and peatlands, are protected with the aim of preserving biodiversity and preventing habitat destruction, unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Nature protection areas are clearly identified in Spain and harvesting authorization or FM Plan include restrictions and prescriptions identified during the process of evaluation from the authority. Concrete requirements are issued to the owner in writing, for instance describing the time of the year when it is now allowed to perform the harvesting, due to the breeding period of protected birds. Duferco includes rules about respect of the authorization within the contract with the supplier. There is customized checklist filled by personnel in charge that collects evidence for each forest lot that Duferco buys from owner or supplier.

	Means of verification National and regional legislation in force. Online maps Manuals of good practices in sustainable forest management Authorisations Contracts with suppliers Risk assessment Low risk
(iv) that harvesting is carried out considering the maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth forests as defined in the country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located, and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with requirements to use logging systems that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and habitats	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	The European Court of Auditors (ECA) research indicates that up to 44% of Spain runs a great risk of soil erosion. According to JRC Science for Policy report “Condition of agricultural soil: Factsheet on soil erosion”, 2017, Soil degradation by water erosion is particularly significant in Spain (3.7 t/ha/year) in years 2000-2012. As a consequence, Several laws in each Autonomous Community regulate management and harvesting, including specific technical limitations (among others, machinery to be used according to the soil conditions, etc.). Duferco and its suppliers only obtains wood from thinnings (forest maintenance and selective harvesting operations) that are approved by the Forest Service. Within the forest stand, organic matter is preserved because no clear cuts are performed. Code good of forest management practices are always used by Duferco and its suppliers. Forest experts check the possibility of high risk of erosion and provide special instructions to the forest workers on the case to case basis. They fill in the check list every time when the work at the new harvesting site starts. After finishing the lot, forest experts check how well the instructions were fulfilled. There is customized checklist filled by personnel in charge that collects evidence for each forest lot that Duferco buys from owner or supplier. Means of verification Existing legal framework. Laws, regulations and control bodies Available maps on the risk of erosion Regional Manuals of good practices in sustainable forest management

	Risk assessment Low risk
(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	The Forestry Act (Law 21/2015 of 20 July amending Act 43/2003 of 21 November on Forestry) is the legal basis for forest management. Most Autonomous Communities have their own forestry legislation that regulates the protection, management and use of forests in their territory. Article 33 of the Forestry Act establishes the need for public utility forests and protection forests to have a Forest Management Plan, a work plan or an equivalent management tool. These documents shall be developed by the owner/holder and must always be approved by the regional forest organization. Where an approved management plan is effective, it shall establish the specific laws and regulations to be taken into account in the forest under consideration. In the case of non-protection private forests and public forests that are not enlisted, it is not compulsory to develop a management plan. The competent body of the autonomous community will regulate in which cases it is mandatory to have a forest management tool. The different laws in each Autonomous Community regulate forest operations, use and specific technical limitations (type of logging, maximum allowable cutting area, machinery to be used according to the soil conditions, etc.), diameters (minimum and/or maximum), species and other parameters. The available forestry statistics of national forestry inventory (IFN3) show a significant increase in timber stocks in Spain from inventory to inventory as a result of both the continued increase in forest area in recent decades and the improvement in forest cover. According to the reports produced by the Ministry's Forestry Service, the annual growth of wood in Spanish forests (45 million m³) is about three times greater than the amount harvested (15 million m³ per year). This balance, with an extraction rate of 35%, is maintained with the current data. However, the figures vary widely between Autonomous Communities and range from 10% to 88%. In all cases, the felling figures are lower than the growth figures. Means of verification Authorization of cutting/Management Plan, stocks and growth data National or regional inventories, stocks and growth data. Harvested volume data Risk assessment Low risk

(vi)¹ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.

Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

(a) **primary forest** and other wooded land and **old growth forest**, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located. If there is no definition of **old growth forest** at the national level, then the following definition shall apply: A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Harvesting permits may have been issued for a forest lot plot that was: primary forest and other wooded land and old growth forest in January 2008 and then was deforested and re-forested afterwards or a poplar plantation may be now on a plot of land that was pprimary forest and other wooded land and old growth forest before 2008. Means of verification Public satellite images before 2008 and afterwards Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was a primary forest and other wooded land and old growth forest before 2008 on the forest lot.

(vi)² That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.

Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

(b) **highly biodiverse forest** and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Harvesting permits may have been issued for a forest lot plot that was: highly biodiverse forest and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority in January 2008 and then was deforested and re-forested afterwards or a poplar plantation may be now on a plot of land that was pprimary forest and other wooded land and old growth forest before 2008.

	Means of verification Public satellite images before 2008 and Harvesting permits details Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was highly biodiverse forest and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority before 2008 on the forest lot.
(vi)³ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(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.</i>	
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	Harvesting permits may have been issued for a forest lot plot that was: highly biodiverse grassland spanning more than one hectare in January 2008 and then was deforested and re-forested afterwards or a poplar plantation may be now on a plot of land that was highly biodiverse grassland spanning more than one hectare before 2008. Means of verification Public satellite images before 2008 and afterwards Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was highly biodiverse grassland spanning more than one hectare before 2008 on the forest lot.
(vi)⁴ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(e) heathland - Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).</i>	
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	Harvesting permits may have been issued for a forest lot plot that was: heathland in January 2008 and then was deforested and reforested afterwards or a poplar plantation may be now on a plot of land that was heathland before 2008. Means of verification Public satellite images before 2008 and afterwards Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was heathland before 2008 on the forest lot.
(vi)⁵ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (4): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status: (a) wetlands, namely land that is covered with or saturated by water permanently or for a significant part of the year (NOTE: Evidence of verification of wetlands should reflect seasonal changes within a year).</i>	
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	Harvesting permits may have been issued for a forest lot plot that was: wetland in January 2008 and then was deforested and reforested afterwards or a poplar plantation may be now on a plot of land that was wetland before 2008. Means of verification Public satellite images before 2008 and afterwards Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was a wetland before 2008 on the forest lot.
(vi)⁶ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (5): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was peatland in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.</i>	
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	Harvesting permits may have been issued for a forest lot plot that was: peatland in January 2008 and then was deforested and reforested

area	afterwards or a poplar plantation may be now on a plot of land that was peatland before 2008. Means of verification Public satellite images before 2008 and afterwards Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was a peatland before 2008 on the forest lot.
(vii) that installations producing biomass fuels from forest biomass, issue a statement of assurance, underpinned by company-level internal processes, for the purpose of the audits conducted pursuant to Article 30(3), that the forest biomass is not sourced from the lands referred to in point (vi).	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	<i>Not applicable, requirement only applies to Level A</i>

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 EU RED Supply Base Evaluation is used	
Country	Italy
Area	Tuscany
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 Italy there is a cadastre system in place (Catasto) that provides spatial boundaries information and land rights about each plot of land, including forests (both public and private). Each cadastral unit has a unique identifier as follows: municipality (Comune), Sheet (Foglio), parcel (Particella, that has a surface in hectares). 'Catasto' is run by the Tax Agency ("Agenzia delle Entrate"), that operates under the control of the

Ministry of Economy and Finance. Data are publicly available. Private forests land tenure and management rights are publicly reported within the ownership documents ('atto di provenienza'), provided by the Registry Office (Ufficio del Registro) that is also part of the Tax Agency.

Public forests are managed by Regions/Provinces and managements rules follow specific regulations defined by specific Regional/Provincial Forestry Laws.

According to national Decree n. 3267/1923, art. 130, public forests (i.e. State, Regional and Municipal) shall be managed in compliance with formally approved Forest management plans (Piani di assestamento); once approved these plans become binding.

For private forests each Region regulates harvesting permits, that must be issued for cutting trees within a forest, except few cases such as collecting firewood for the amount annual needed by the family of the owner); harvesting permits include detailed rules about numbers or percentage of trees that can be felled (and/or released, depending on the case) and other issues related to HCV, like biodiversity, microhabitats, cultural and historical values protection if any, etc. Harvesting in a forest in all Italy is regulated both by national and regional/provincial laws.

There is indeed another level of control, since in Italy all land plots that may be included in the regional definition of "forest" are also protected as a landscape element since 1985 (this protection was re-assured by the Code of cultural heritage and landscape 2004, Law Decree no. 42/2004, art. 142, comma 1, lett. g); consequently, a clear cut or an authorized cut or a non-compliant cut may result also as a criminal offence, because it is considered as an environmental damage that also affects landscape.

European Timber Regulation (Reg. UE 995/2010 - Due Diligence) applies in all Italy and a national Register (RIL=Registro Imprese Legno) platform was created for all operators that are obliged to be recorded. Forest operations and EUTR enforcement are supervised in Italy by the army of Gruppo Carabinieri Forestale that have functions of rural police; very expensive fines apply for non-conformity in felling within a forest and EUTR requirements.

Duferco Biomasse signs a contract with each supplier, that includes clauses to provide evidence of legality in the harvesting operations and traceability (including cadastral units), up to the owner of the forest. This is also a requirement by Ministry Decree 2 March 2010 (Decreto Ministeriale delle Politiche Agricole Alimentari e Forestali del 2 marzo 2010) that establish strict rules for traceability of all biomass that is delivered to power plants in Italy.

As European Timber Regulation - Reg. UE 995/2010 (Due Diligence) requirements also apply, access to information is also regulated in the contract between Duferco Biomasse and its suppliers.

No royalties nor taxes are due for harvesting timber of any kind in Italy, but Duferco Biomasse requires the statement of social security non-debt (DURC) for each supplier every 4 months; the statement is issued by the

	national institute of social security (INPS). VAT, when due, is paid monthly or every quarter of year, following a compensation calculation (VAT debit minus VAT credit). A concession fee/auction price may be paid for harvesting public forests, following the authorization process, and this document is also required by Duferco Biomasse to provide evidence of legality. Means of verification - Cadastral references in harvesting permits and contracts - Harvesting permits or Forest Managements Plan - RIL (Registro Imprese Legno) National registry of wood operators - Signed contracts between Duferco Biomasse and suppliers and between suppliers and owners/land managers. - Self-Declarations regulated by Ministry Decree 2 March 2010 - Other authorizations/documents collected in Duferco Biomasse archive. Risk assessment Low risk
(ii) Forest regeneration of harvested areas	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	In Italy the National forest law is Law Decree no. 34/2008, that states at art. 7 that natural or artificial regeneration of each forest after felling must be protected/provided; as a consequence, the Regional/Provincial Forestry Regulations include mandatory rules for each forest type, in order to achieve the natural regeneration or either artificial regeneration. Natural regeneration must be protected in any felling within a forest. Regeneration of the forest should be achieved in a continuous and natural way, limiting the use of artificial regeneration only to cases of lack of natural regeneration, always with autochthonous species. Clear cut is forbidden in any case, unless for phytosanitary reasons, under a mandatory project of re-planting or natural regeneration, that is supervised by public authority. Forest operations and EUTR enforcement are supervised in Italy by the army of Gruppo Carabinieri Forestale that have functions of rural police; very expensive fines apply for non-conformity in case of disrespect of regeneration and re-planting rules. Evidence of compliance about regeneration of the forest is collected by Duferco Biomasse for each forest lot, such as field visit reports and surveys by public authority. Means of verification - Harvesting permits or Forest Managements Plan

	- Regional/Provincial public data and reports - Italy National Forests report (RAF) 2019 Risk assessment Low risk
(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grasslands, heathland and peatlands, are protected with the aim of preserving biodiversity and preventing habitat destruction, unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	UE Biodiversity information System provide information that 21.4% of terrestrial area of Italy is designated as protected areas, which is below the EU average value of 26.4%. Considering that Italy has a limited surface of land territory and, on the contrary, a high density of population, the average data of 21.4% can be considered as a good result. Following the European Habitat Directive 92/43/CEE, in Italy 19.38% of terrestrial area was identified as Nature 2000 sites and further 6.35% of marine areas are also Nature 2000 sites. In Tuscany the values are 14.23% (terrestrial area) and 27.08% (marine area). Following National Laws and Regional/Provincial Laws, surfaces and boundaries of areas of high conservation value are clearly mapped. The National Law no. 394/1991 defines criteria and protective measures in identifying and then managing protected areas in Italy. Three main categories of protected areas may be established: 1- national parks, 2- regional and trans-regional natural parks, 3- natural and special reserves. Furthermore, Decree no. 357/1997 (together with the Ministerial Decree of 17 October 2007) defines the main criteria for the identification and management of the Sites of Community Importance (SCI) following to European Directive 92/43 D. n. 357/1997. The Decree delegates to the Regions or autonomous provinces the task of identifying SCIs within their territories and provide all information to the Ministry of Environment. According to L. no. 394/1991, management of natural reserves and parks shall be in compliance with a detailed Management Plan (“Piano d’Area”) developed by the park or reserve managing authority and approved by the Ministry. According to art. 21 of the same law, the State Forestry Corps (now under Carabinieri Army) are responsible for performing controls in parks and in the natural reserves about forest management activities. Evidence of compliance about respect of protected areas is collected by Duferco Biomasse for each forest lot, such as field visit reports and

	surveys by public authority. Means of verification - EU Natura 2000 Network (Habitat Directive 92/43/CEE); - National and Regional/Provincial Laws; - Harvesting permits or Forest Managements Plan, Park authorization, Incidence evaluation, other permits to operate within the protected areas; - Regional/provincial and national databases and geoportals that identify and map the protected areas and habitats. Risk assessment Low risk
(iv) that harvesting is carried out considering the maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth forests as defined in the country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located, and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with requirements to use logging systems that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and habitats	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	As forestry operations might damage the soil structure, the Regional/Provincial Forestry Regulation have detailed rules about prevention of erosion, but still in each lot erosion may happen due to machinery operativity over slopes. A study by the University of Florence named “Good practices for the reduction of impacts during logging operations” resulted in a leaflet that is a good start for training about reducing potential damage to soil. About impact on biodiversity, the regulations and the surveillance procedures carried out by the Italian Regions/Provinces are detailed and biodiversity is well monitored and protected, through established rules called “Misura di Conservazione” (conservation measures). Protected areas cannot decrease, but only increase in surface and/or number of protected HCV, including biodiversity; this means that mandatory rules are issued for forest works that assure at least maintenance of HCV, but also enhancement (for instance conservation and regeneration of rare species). The objective of the parks and the network of reserves and sites is in any case the conservation, recovery and enhancement of the natural and environmental characteristics of the territory, with particular reference to habitats, species, natural emergencies and biodiversity. The activity inside the parks and reserves is regulated through specific regulations. Every protected area has got a specific planning called “Piano d’Area”

	that details measures and operations about conservations goals and enhancement; the management body of the protected area is in charge of implementation and monitoring. Further monitoring are performed both at European level (European Forest Damage Monitoring Network) and at national level by INEA (National Institute of Agricultural Economics- Forest Observatory), ensuring additional level of control. Evidence of compliance is collected by Duferco Biomasse for each forest lot within the managing program, including upload of authorization documents. Means of verification - Approved documents “Conservation measures” (“Misure di Conservazione”) for each area - National and Regional/Provincial Laws and Forestry Regulations; - Harvesting permits or Forest Managements Plan; - National and Regional Geoportals; - Project SkiddForw by University of Florence; - European Forest Damage Monitoring Network; - National monitoring body: Osservatorio foreste dell'INEA. Risk assessment Specified risk for maintenance of soil quality, as soil quality may be affected by forestry operations in some lots up in the mountains, where operations are performed over slopes. Low risk for maintenance of biodiversity. Mitigation Measures Field visits are performed during and after the field work to check compliance to soil quality maintenance; in case on non-compliance, the supplier is notified and instructed on how to solve the problem within a period of time. If the problem is not solved, the supplier is temporarily invalidated, and the lot is rejected.
(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	Regional/Provincial law enforcement provides strict rules about harvesting levels (for instance percentage of cutting, number of plants to be released, etc.) and they are mandatory. Forest owners and managers must apply for a felling licence or for approval of a forest management plan by the local authority. These applications, when approved, are mandatory about harvesting levels. In a few limited cases, a higher harvesting level may be justified by the authorization process according to specific aims (for instance river banks

	cuttings related to trees that may fall into the river and create a problem downstream), but it's a tiny percentage over a constant huge increase in forest cover in all Italy, more than 25% in the last 30 years. The last Report about forests state and Forestry sector in Italy 2018 states that inventory of forests in Italy has developed an important increase in every forest type and only less than 1/5 of the annual increase was sourced as timber. Means of verification - National and Regional/Provincial Laws and Forestry Regulations; - Report about forests state and Forestry sector in Italy 2018 (Rapporto sullo stato delle foreste e del settore forestale in Italia); - Data about wood stock and wood sourcing at regional level. Risk assessment Low risk
(vi)¹ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(a) primary forest and other wooded land and old growth forest, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located. If there is no definition of old growth forest at the national level, then the following definition shall apply: A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.</i>	
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	Harvesting permits may have been issued for a forest lot plot that was: primary forest and other wooded land and old growth forest in January 2008 and then was deforested and re-forested afterwards or a poplar plantation may be now on a plot of land that was primary forest and other wooded land and old growth forest before 2008. Means of verification Public satellite images before 2008 and afterwards Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was a primary forest and other wooded land and old growth forest before 2008 on the forest lot.
(vi)² That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land</i>	

with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

(b) **highly biodiverse forest** and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Harvesting permits may have been issued for a forest lot plot that was: highly biodiverse forest and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority in January 2008 and then was deforested and re-forested afterwards or a poplar plantation may be now on a plot of land that was primary forest and other wooded land and old growth forest before 2008. Means of verification Public satellite images before 2008 and afterwards Harvesting permits details Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was highly biodiverse forest and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority before 2008 on the forest lot.

(vi)³ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.

Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

(d) **highly biodiverse grassland** spanning more than one hectare that is: (i) natural, namely grassland that would remain grassland in the absence of human intervention and that maintains the natural species composition and ecological characteristics and processes; or (ii) non-natural, namely grassland that would cease to be grassland in the absence of human intervention and that is species-rich and not degraded and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the harvesting of the raw material is necessary to preserve its status as highly biodiverse grassland.

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Harvesting permits may have been issued for a forest lot plot that was: highly biodiverse grassland spanning more than one hectare in January 2008 and then was deforested and re-forested afterwards or a poplar plantation may be now on a plot of land that was highly biodiverse grassland spanning more than one hectare before 2008. Means of verification Public satellite images before 2008 and afterwards

	Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was highly biodiverse grassland spanning more than one hectare before 2008 on the forest lot.
(vi)⁴ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(e) heathland - Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).</i>	
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	Harvesting permits may have been issued for a forest lot plot that was: heathland in January 2008 and then was deforested and reforested afterwards or a poplar plantation may be now on a plot of land that was heathland before 2008. Means of verification Public satellite images before 2008 and afterwards Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was a heathland before 2008 on the forest lot.
(vi)⁵ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (4): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:</i> <i>(a) wetlands, namely land that is covered with or saturated by water permanently or for a significant part of the year (NOTE: Evidence of verification of wetlands should reflect seasonal changes within a year).</i>	
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	Harvesting permits may have been issued for a forest lot plot that was: wetland in January 2008 and then was deforested and reforested afterwards or a poplar plantation may be now on a plot of land that was wetland before 2008.

	Means of verification Public satellite images before 2008 and afterwards Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was a wetland before 2008 on the forest lot.
(vi)⁶ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (5): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was peatland in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.</i>	
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	Harvesting permits may have been issued for a forest lot plot that was: peatland in January 2008 and then was deforested and reforested afterwards or a poplar plantation may be now on a plot of land that was peatland before 2008. Means of verification Public satellite images before 2008 and afterwards Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was a peatland before 2008 on the forest lot.
(vii) that installations producing biomass fuels from forest biomass, issue a statement of assurance, underpinned by company-level internal processes, for the purpose of the audits conducted pursuant to Article 30(3), that the forest biomass is not sourced from the lands referred to in point (vi).	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	<i>Not applicable, requirement only applies to Level A</i>

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 EU RED Supply Base Evaluation is used

Country	Italy
Area	Apulia
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 Italy there is a cadastre system in place (Catasto) that provides spatial boundaries information and land rights about each plot of land, including olive orchard plots. Each cadastral unit has a unique identifier as follows: municipality (Comune), Sheet (Foglio), parcel (Particella, that has a surface in hectares). 'Catasto' is runned by the Tax Agency ("Agenzia delle Entrate"), that operates under the control of the Ministry of Economy and Finance. Data are publicly available. Private land rights are publicly reported within the ownership documents ('atto di provenienza'), provided by the Registry Office (Ufficio del Registro) that is also part of the Tax Agency. Authorizations are issued by local authority to eradicate affected olive trees, including cadastral units reference. Duferco Biomasse signs a contract with each supplier, that includes clauses to provide evidence of legality in the harvesting operations and traceability (including cadastral units), up to the owner of the land plot. No royalties nor taxes are due for harvesting timber of any kind in Italy, but Duferco Biomasse requires the statement of social security non-debt (DURC) for each supplier every 4 months; the statement is issued by the national institute of social security (INPS). VAT, when due, is paid monthly or every quarter of year, following a compensation calculation (VAT debit minus VAT credit). All traceability documents are required by Duferco Biomasse to provide evidence of legality. Means of verification - Cadastral references in eradication authorizations and contracts - Signed contracts between Duferco Biomasse and suppliers and between suppliers and owners/land managers. - Authorizations/documents collected in Duferco Biomasse archive. Risk assessment Low risk
(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	Not applicable to olive trees orchards, but re-planting of an even or bigger number of olive trees is part of the salvage operation.
(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grasslands, heathland and peatlands, are protected with the aim of preserving biodiversity and preventing habitat destruction, unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Not applicable to olive trees orchards.
(iv) that harvesting is carried out considering the maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth forests as defined in the country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located, and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with requirements to use logging systems that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and habitats	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Soil quality may be slightly affected by salvage operations in some lots, over little slopes, as erosion may be increased locally, where machines left furrows, but then olive orchards are restored and land profile restored as well. Since the crop has been traditional for centuries, it is the best interest for land manager to ensure protection of soil quality. Application of best practises in the agricultural land ensure at least maintenance of HCV, including biodiversity (for instance wildlife protection). Evidence of compliance about these aspects is collected by Duferco Biomasse for each lot. Means of verification - Traditional land management - Surveys of Re-planting operations Risk assessment Low risk
(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	Not applicable to olive trees orchards.
(vi)¹ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status: (a) primary forest and other wooded land and old growth forest, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located. If there is no definition of old growth forest at the national level, then the following definition shall apply: A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Not applicable to olive trees orchards.
(vi)² That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status: (b) highly biodiverse forest and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Not applicable to olive trees orchards.
(vi)³ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:	

(d) **highly biodiverse grassland** spanning more than one hectare that is: (i) *natural*, namely grassland that would remain grassland in the absence of human intervention and that maintains the natural species composition and ecological characteristics and processes; or (ii) *non-natural*, namely grassland that would cease to be grassland in the absence of human intervention and that is species-rich and not degraded and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the harvesting of the raw material is necessary to preserve its status as highly biodiverse grassland.

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Not applicable to olive trees orchards.

(vi)⁴ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.

Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

(e) **heathland** - Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Not applicable to olive trees orchards.

(vi)⁵ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.

Article 29 (4): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:

(a) **wetlands**, namely land that is covered with or saturated by water permanently or for a significant part of the year (NOTE: Evidence of verification of wetlands should reflect seasonal changes within a year).

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Not applicable to olive trees orchards.

(vi)⁶ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.

Article 29 (5): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was peatland in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Not applicable to olive trees orchards.
(vii) that installations producing biomass fuels from forest biomass, issue a statement of assurance, underpinned by company-level internal processes, for the purpose of the audits conducted pursuant to Article 30(3), that the forest biomass is not sourced from the lands referred to in point (vi).	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Not applicable, requirement only applies to Level A

LULUCF criteria 29(7)

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

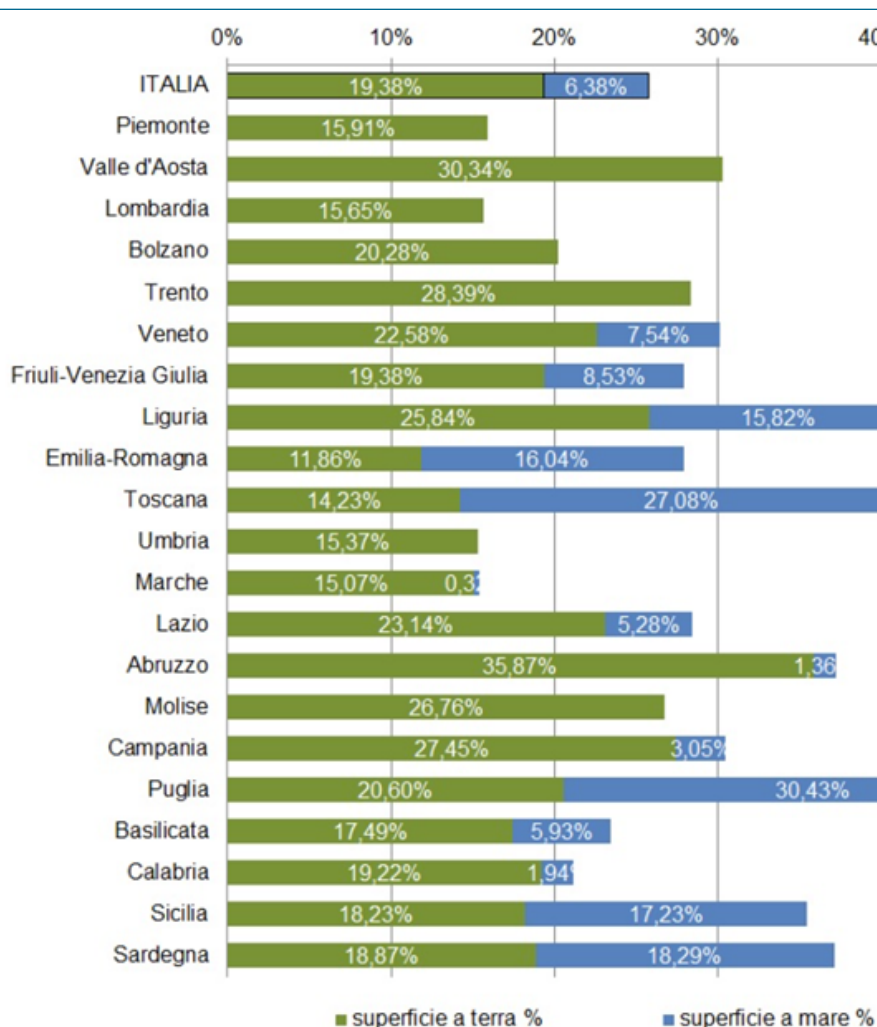
Countries where EU RED Supply Base Evaluation is used

Country	Italy
Area	Northern and Central Regions, Sardinia
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 Italy there is a cadastre system in place (Catasto) that provides spatial boundaries information and land rights about each plot of land, including forests (both public and private). Each cadastral unit has a unique identifier as follows: municipality (Comune), Sheet (Foglio), parcel (Particella, that has a surface in hectares). 'Catasto' is run by the Tax Agency ("Agenzia delle Entrate"), that operates under the control of the Ministry of Economy and Finance. Data are publicly available. Private forests land tenure and management rights are publicly reported within the ownership documents ('atto di provenienza'), provided by the Registry Office (Ufficio del Registro) that is also part of the Tax Agency. Public forests are managed by Regions/Provinces and management rules follow specific regulations defined by specific Regional/Provincial Forestry Laws. According to national Decree n. 3267/1923, art. 130, public forests (i.e. State, Regional and Municipal) shall be managed in compliance with formally approved Forest management plans (Piani di assestamento); once approved these plans become binding. For private forests each Region regulates harvesting permits, that must be issued for cutting trees within a forest, except few cases such as collecting firewood for the amount annual needed by the family of the owner); harvesting permits include detailed rules about numbers or percentage of trees that can be felled (and/or released, depending on the case) and other issues related to HCV, like biodiversity, microhabitats, cultural and historical values protection if any, etc. Harvesting in a forest in all Italy is regulated both by national and regional/provincial laws. There is indeed another level of control, since in Italy all land plots that may be included in the regional definition of "forest" are also protected as a landscape element since 1985 (this protection was re-assured by the Code of cultural heritage and landscape 2004, Law Decree no. 42/2004, art. 142, comma 1, lett. g); consequently, a clear cut or an authorized cut or a non-compliant cut may result also as a criminal offence, because it is considered as an environmental damage that also affects landscape. European Timber Regulation (Reg. UE 995/2010 - Due Diligence) applies in all Italy and a national Register (RIL=Registro Imprese Legno) platform was created for all operators that are obliged to be recorded. Forest operations and EUTR enforcement are supervised in Italy by the army of Gruppo Carabinieri Forestale that have functions of rural police; very expensive fines apply for non-conformity in felling within a forest and EUTR requirements. Duferco Biomasse signs a contract with each supplier, that includes clauses to provide evidence of legality in the harvesting operations and traceability (including cadastral units), up to the owner of the forest. This is also a requirement by Ministry Decree 2 March 2010 (Decreto Ministeriale delle Politiche Agricole Alimentari e Forestali del 2 marzo

	2010) that establish strict rules for traceability of all biomass that is delivered to power plants in Italy. As European Timber Regulation - Reg. UE 995/2010 (Due Diligence) requirements also apply, access to information is also regulated in the contract between Duferco Biomasse and its suppliers. No royalties nor taxes are due for harvesting timber of any kind in Italy, but Duferco Biomasse requires the statement of social security non-debt (DURC) for each supplier every 4 months; the statement is issued by the national institute of social security (INPS). VAT, when due, is paid monthly or every quarter of year, following a compensation calculation (VAT debit minus VAT credit). A concession fee/auction price may be paid for harvesting public forests, following the authorization process, and this document is also required by Duferco Biomasse to provide evidence of legality. Means of verification - Cadastral references in harvesting permits and contracts - Harvesting permits or Forest Managements Plan - RIL (Registro Imprese Legno) National registry of wood operators - Signed contracts between Duferco Biomasse and suppliers and between suppliers and owners/land managers. - Self-Declarations regulated by Ministry Decree 2 March 2010 - Other authorizations/documents collected in Duferco Biomasse archive. Risk assessment Low risk
(ii) Forest regeneration of harvested areas	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	In Italy the National forest law is Law Decree no. 34/2008, that states at art. 7 that natural or artificial regeneration of each forest after felling must be protected/provided; as a consequence, the Regional/Provincial Forestry Regulations include mandatory rules for each forest type, in order to achieve the natural regeneration or either artificial regeneration. Natural regeneration must be protected in any felling within a forest. Regeneration of the forest should be achieved in a continuous and natural way, limiting the use of artificial regeneration only to cases of lack of natural regeneration, always with autochthonous species. Clear cut is forbidden in any case, unless for phytosanitary reasons, under a mandatory project of re-planting or natural regeneration, that is supervised by public authority. Forest operations and EUTR enforcement are supervised in Italy by the army of Gruppo Carabinieri Forestale that have functions of rural police;

	very expensive fines apply for non-conformity in case of disrespect of regeneration and re-planting rules. Evidence of compliance about regeneration of the forest is collected by Duferco Biomasse for each forest lot, such as field visit reports and surveys by public authority. Means of verification - Harvesting permits or Forest Managements Plan - Regional/Provincial public data and reports - Italy National Forests report (RAF) 2019 Risk assessment Low risk
(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grasslands, heathland and peatlands, are protected with the aim of preserving biodiversity and preventing habitat destruction, unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	UE Biodiversity information System provide information that 21.4% of terrestrial area of Italy is designated as protected areas, which is below the EU average value of 26.4%. Considering that Italy has a limited surface of land territory and, on the contrary, a high density of population, the average data of 21.4% can be considered as a good result. Following the European Habitat Directive 92/43/CEE, in Italy 19.38% of terrestrial area was identified as Nature 2000 sites and further 6.35% of marine areas are also Nature 2000 sites.



Natura 2000 sites surface percentage per Region

Following National Laws and Regional/Provincial Laws, surfaces and boundaries of areas of high conservation value are clearly mapped. The National Law no. 394/1991 defines criteria and protective measures in identifying and then managing protected areas in Italy. Three main categories of protected areas may be established:

- 1- national parks,
- 2- regional and trans-regional natural parks,
- 3- natural and special reserves.

Furthermore, Decree no. 357/1997 (together with the Ministerial Decree of 17 October 2007) defines the main criteria for the identification and management of the Sites of Community Importance (SCI) following to European Directive 92/43 D. n. 357/1997. The Decree delegates to the Regions or autonomous provinces the task of identifying SCIs within their territories and provide all information to the Ministry of Environment. According to L. no. 394/1991, management of natural reserves and parks shall be in compliance with a detailed Management Plan ("Piano

	d'Area") developed by the park or reserve managing authority and approved by the Ministry. According to art. 21 of the same law, the State Forestry Corps (now under Carabinieri Army) are responsible for performing controls in parks and in the natural reserves about forest management activities. Evidence of compliance about respect of protected areas is collected by Duferco Biomasse for each forest lot, such as field visit reports and surveys by public authority. Means of verification - EU Natura 2000 Network (Habitat Directive 92/43/CEE); - National and Regional/Provincial Laws; - Harvesting permits or Forest Managements Plan, Park authorization, Incidence evaluation, other permits to operate within the protected areas; - Regional/provincial and national databases and geoportals that identify and map the protected areas and habitats. Risk assessment Low risk
(iv) that harvesting is carried out considering the maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth forests as defined in the country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located, and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with requirements to use logging systems that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and habitats	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	As forestry operations might damage the soil structure, the Regional/Provincial Forestry Regulation have detailed rules about prevention of erosion, but still in each lot erosion may happen due to machinery operativity over slopes. A study by the University of Florence named "Good practices for the reduction of impacts during logging operations" resulted in a leaflet that is a good start for training about reducing potential damage to soil. About impact on biodiversity, the regulations and the surveillance procedures carried out by the Italian Regions/Provinces are detailed and biodiversity is well monitored and protected, through established rules called "Misure di Conservazione" (conservation measures). Protected areas cannot decrease, but only increase in surface and/or number of protected HCV, including biodiversity; this means that mandatory rules are issued for forest works that assure at least

	maintenance of HCV, but also enhancement (for instance conservation and regeneration of rare species). The objective of the parks and the network of reserves and sites is in any case the conservation, recovery and enhancement of the natural and environmental characteristics of the territory, with particular reference to habitats, species, natural emergencies and biodiversity. The activity inside the parks and reserves is regulated through specific regulations. Every protected area has got a specific planning called “Piano d’Area” that details measures and operations about conservations goals and enhancement; the management body of the protected area is in charge of implementation and monitoring. Further monitoring are performed both at European level (European Forest Damage Monitoring Network) and at national level by INEA (National Institute of Agricultural Economics- Forest Observatory), ensuring additional level of control. Evidence of compliance is collected by Duferco Biomasse for each forest lot within the managing program, including upload of authorization documents. Means of verification - Approved documents “Conservation measures” (“Misure di Conservazione”) for each area - National and Regional/Provincial Laws and Forestry Regulations; - Harvesting permits or Forest Managements Plan; - National and Regional Geoportals; - Project SkiddForw by University of Florence; - European Forest Damage Monitoring Network; - National monitoring body: Osservatorio foreste dell'INEA. Risk assessment Specified risk for maintenance of soil quality, as soil quality may be affected by forestry operations in some lots up in the mountains, where operations are performed over slopes. Low risk for maintenance of biodiversity. Mitigation Measures Field visits are performed during and after the field work to check compliance to soil quality maintenance; in case on non-compliance, the supplier is notified and instructed on how to solve the problem within a period of time. If the problem is not solved, the supplier is temporarily invalidated, and the lot is rejected.
(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	Regional/Provincial law enforcement provides strict rules about harvesting levels (for instance percentage of cutting, number of plants to be released, etc.) and they are mandatory. Forest owners and managers must apply for a felling licence or for approval of a forest management plan by the local authority. These applications, when approved, are mandatory about harvesting levels. In a few limited cases, a higher harvesting level may be justified by the authorization process according to specific aims (for instance river banks cuttings related to trees that may fall into the river and create a problem downstream), but it's a tiny percentage over a constant huge increase in forest cover in all Italy, more than 25% in the last 30 years. The last Report about forests state and Forestry sector in Italy 2018 states that inventory of forests in Italy has developed an important increase in every forest type and only less than 1/5 of the annual increase was sourced as timber. Means of verification - National and Regional/Provincial Laws and Forestry Regulations; - Report about forests state and Forestry sector in Italy 2018 (Rapporto sullo stato delle foreste e del settore forestale in Italia); - Data about wood stock and wood sourcing at regional level. Risk assessment Low risk
(vi)¹ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(a) primary forest and other wooded land and old growth forest, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located. If there is no definition of old growth forest at the national level, then the following definition shall apply: A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.</i>	
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	Harvesting permits may have been issued for a forest lot plot that was: primary forest and other wooded land and old growth forest in January 2008 and then was deforested and re-forested afterwards or a poplar plantation may be now on a plot of land that was pprimary forest and other wooded land and old growth forest before 2008. Means of verification Public satellite images before 2008 and afterwards Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was a primary forest and other wooded land and old

	growth forest before 2008 on the forest lot.
(vi)² That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(b) highly biodiverse forest and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.</i>	
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	Harvesting permits may have been issued for a forest lot plot that was: highly biodiverse forest and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority in January 2008 and then was deforested and re-forested afterwards or a poplar plantation may be now on a plot of land that was primary forest and other wooded land and old growth forest before 2008. Means of verification Public satellite images before 2008 and afterwards Harvesting permits details Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was highly biodiverse forest and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority before 2008 on the forest lot.
(vi)³ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(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.</i>	
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	Harvesting permits may have been issued for a forest lot plot that was: highly biodiverse grassland spanning more than one hectare in January 2008 and then was deforested and re-forested afterwards or a poplar plantation may be now on

	a plot of land that was highly biodiverse grassland spanning more than one hectare before 2008. Means of verification Public satellite images before 2008 and afterwards Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was highly biodiverse grassland spanning more than one hectare before 2008 on the forest lot.
(vi)⁴ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(e) heathland - Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).</i>	
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	Harvesting permits may have been issued for a forest lot plot that was: heathland in January 2008 and then was deforested and reforested afterwards or a poplar plantation may be now on a plot of land that was heathland before 2008. Means of verification Public satellite images before 2008 and afterwards Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was a heathland before 2008 on the forest lot.
(vi)⁵ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (4): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:</i> <i>(a) wetlands, namely land that is covered with or saturated by water permanently or for a significant part of the year (NOTE: Evidence of verification of wetlands should reflect seasonal changes within a year).</i>	
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	Harvesting permits may have been issued for a forest lot plot that was: wetland in January 2008 and then was deforested and reforested afterwards or a poplar plantation may be now on a plot of land that was wetland before 2008. Means of verification Public satellite images before 2008 and afterwards Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was a wetland before 2008 on the forest lot.
(vi)⁶ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses	

referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.

Article 29 (5): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was peatland in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Harvesting permits may have been issued for a forest lot plot that was: peatland in January 2008 and then was deforested and reforested afterwards or a poplar plantation may be now on a plot of land that was peatland before 2008. Means of verification Public satellite images before 2008 and afterwards Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was a peatland before 2008 on the forest lot.
(vii) that installations producing biomass fuels from forest biomass, issue a statement of assurance, underpinned by company-level internal processes, for the purpose of the audits conducted pursuant to Article 30(3), that the forest biomass is not sourced from the lands referred to in point (vi).	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	<i>Not applicable, requirement only applies to Level A</i>

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 EU RED Supply Base Evaluation is used

Country	Italy
Area	Lazio
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 Italy there is a cadastre system in place (Catasto) that provides spatial boundaries information and land rights about each plot of land, including forests (both public and private). Each cadastral unit has an unique identifier as follows: municipality (Comune), Sheet (Foglio), parcel (Particella, that has a surface in hectares). 'Catasto' is runned by the Tax Agency ("Agenzia delle Entrate"), that operates under the control of the Ministry of Economy and Finance. Data are publicly available. Private forests land tenure and management rights are publicly reported within the ownership documents ('atto di provenienza'), provided by the Registry Office (Ufficio del Registro) that is also part of the Tax Agency. Public forests are managed by Regions/Provinces and managements rules follow specific regulations defined by specific Regional/Provincial Forestry Laws. According to national Decree n. 3267/1923, art. 130, public forests (i.e. State, Regional and Municipal) shall be managed in compliance with formally approved Forest management plans (Piani di assestamento); once approved these plans become binding. For private forests each Region regulates harvesting permits, that must be issued for cutting trees within a forest, except few cases such as collecting firewood for the amount annual needed by the family of the owner); harvesting permits include detailed rules about numbers or percentage of trees that can be felled (and/or released, depending on the case) and other issues related to HCV, like biodiversity, microhabitats, cultural and historical values protection if any, etc. Harvesting in a forest in all Italy is regulated both by national and regional/provincial laws. There is indeed another level of control, since in Italy all land plots that may be included in the regional definition of "forest" are also protected as a landscape element since 1985 (this protection was re-assured by the Code of cultural heritage and landscape 2004, Law Decree no. 42/2004, art. 142, comma 1, lett. g); consequently, a clear cut or an authorized cut or a non-compliant cut may result also as a criminal offence, because it is considered as an environmental damage that also affects landscape. European Timber Regulation (Reg. UE 995/2010 - Due Diligence) applies in all Italy and a national Register (RIL=Registro Imprese Legno) platform was created for all operators that are obliged to be recorded. Forest operations and EUTR enforcement are supervised in Italy by the army of Gruppo Carabinieri Forestale that have functions of rural police; very expensive fines apply for non-conformity in felling within a forest and EUTR requirements. Duferco Biomasse signs a contract with each supplier, that includes clauses to provide evidence of legality in the harvesting operations and

	traceability (including cadastral units), up to the owner of the forest. This is also a requirement by Ministry Decree 2 March 2010 (Decreto Ministeriale delle Politiche Agricole Alimentari e Forestali del 2 marzo 2010) that establish strict rules for traceability of all biomass that is delivered to power plants in Italy. As European Timber Regulation - Reg. UE 995/2010 (Due Diligence) requirements also apply, access to information is also regulated in the contract between Duferco Biomasse and its suppliers. No royalties nor taxes are due for harvesting timber of any kind in Italy, but Duferco Biomasse requires the statement of social security non-debt (DURC) for each supplier every 4 months; the statement is issued by the national institute of social security (INPS). VAT, when due, is paid monthly or every quarter of year, following a compensation calculation (VAT debit minus VAT credit). A concession fee/auction price may be paid for harvesting public forests, following the authorization process, and this document is also required by Duferco Biomasse to provide evidence of legality. Means of verification - Cadastral references in harvesting permits and contracts - Harvesting permits or Forest Managements Plan - RIL (Registro Imprese Legno) National registry of wood operators - Signed contracts between Duferco Biomasse and suppliers and between suppliers and owners/land managers. - Self-Declarations regulated by Ministry Decree 2 March 2010 - Other authorizations/documents collected in Duferco Biomasse archive. Risk assessment Low risk
(ii) Forest regeneration of harvested areas	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	In Italy the National forest law is Law Decree no. 34/2008, that states at art. 7 that natural or artificial regeneration of each forest after felling must be protected/provided; as a consequence, the Regional/Provincial Forestry Regulations include mandatory rules for each forest type, in order to achieve the natural regeneration or either artificial regeneration. Natural regeneration must be protected in any felling within a forest. Regeneration of the forest should be achieved in a continuous and natural way, limiting the use of artificial regeneration only to cases of lack of natural regeneration, always with autochthonous species. Clear cut is forbidden in any case, unless for phytosanitary reasons, under a mandatory project of re-planting or natural regeneration, that is

	supervised by public authority. Forest operations and EUTR enforcement are supervised in Italy by the army of Gruppo Carabinieri Forestale that have functions of rural police; very expensive fines apply for non-conformity in case of disrespect of regeneration and re-planting rules. Evidence of compliance about regeneration of the forest is collected by Duferco Biomasse for each forest lot, such as field visit reports and surveys by public authority. Means of verification - Harvesting permits or Forest Managements Plan - Regional/Provincial public data and reports - Italy National Forests report (RAF) 2019 Risk assessment Low risk
(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grasslands, heathland and peatlands, are protected with the aim of preserving biodiversity and preventing habitat destruction, unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	UE Biodiversity information System provide information that 21.4% of terrestrial area of Italy is designated as protected areas, which is below the EU average value of 26.4%. Considering that Italy has a limited surface of land territory and, on the contrary, a high density of population, the average data of 21.4% can be considered as a good result. Following the European Habitat Directive 92/43/CEE, in Italy 19.38% of terrestrial area was identified as Nature 2000 sites and further 6.35% of marine areas are also Nature 2000 sites. In Lazio the values are 23.14% (terrestrial area) and 5.28% (marine area) . Following National Laws and Regional/Provincial Laws, surfaces and boundaries of areas of high conservation value are clearly mapped. The National Law no. 394/1991 defines criteria and protective measures in identifying and then managing protected areas in Italy. Three main categories of protected areas may be established: 1- national parks, 2- regional and trans-regional natural parks, 3- natural and special reserves. Furthermore, Decree no. 357/1997 (together with the Ministerial Decree of 17 October 2007) defines the main criteria for the identification and management of the Sites of Community Importance (SCI) following to European Directive 92/43 D. n. 357/1997. The Decree delegates to the

	Regions or autonomous provinces the task of identifying SCIs within their territories and provide all information to the Ministry of Environment. According to L. no. 394/1991, management of natural reserves and parks shall be in compliance with a detailed Management Plan (“Piano d’Area”) developed by the park or reserve managing authority and approved by the Ministry. According to art. 21 of the same law, the State Forestry Corps (now under Carabinieri Army) are responsible for performing controls in parks and in the natural reserves about forest management activities. Evidence of compliance about respect of protected areas is collected by Duferco Biomasse for each forest lot, such as field visit reports and surveys by public authority. Means of verification - EU Natura 2000 Network (Habitat Directive 92/43/CEE); - National and Regional/Provincial Laws; - Harvesting permits or Forest Managements Plan, Park authorization, Incidence evaluation, other permits to operate within the protected areas; - Regional/provincial and national databases and geoportals that identify and map the protected areas and habitats. Risk assessment Low risk
(iv) that harvesting is carried out considering the maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth forests as defined in the country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located, and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with requirements to use logging systems that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and habitats	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	As forestry operations might damage the soil structure, the Regional/Provincial Forestry Regulation have detailed rules about prevention of erosion, but still in each lot erosion may happen due to machinery operativity over slopes. A study by the University of Florence named “Good practices for the reduction of impacts during logging operations” resulted in a leaflet that is a good start for training about reducing potential damage to soil. About impact on biodiversity, the regulations and the surveillance procedures carried out by the Italian Regions/Provinces are detailed and biodiversity is well monitored and protected, through established rules called “Misura di Conservazione” (conservation measures).

	Protected areas cannot decrease, but only increase in surface and/or number of protected HCV, including biodiversity; this means that mandatory rules are issued for forest works that assure at least maintenance of HCV, but also enhancement (for instance conservation and regeneration of rare species). The objective of the parks and the network of reserves and sites is in any case the conservation, recovery and enhancement of the natural and environmental characteristics of the territory, with particular reference to habitats, species, natural emergencies and biodiversity. The activity inside the parks and reserves is regulated through specific regulations. Every protected area has got a specific planning called “Piano d’Area” that details measures and operations about conservations goals and enhancement; the management body of the protected area is in charge of implementation and monitoring. Further monitoring are performed both at European level (European Forest Damage Monitoring Network) and at national level by INEA (National Institute of Agricultural Economics- Forest Observatory), ensuring additional level of control. Evidence of compliance is collected by Duferco Biomasse for each forest lot within the managing program, including upload of authorization documents. Means of verification - Approved documents “Conservation measures” (“Misure di Conservazione”) for each area - National and Regional/Provincial Laws and Forestry Regulations; - Harvesting permits or Forest Managements Plan; - National and Regional Geoportals; - Project SkiddForw by University of Florence; - European Forest Damage Monitoring Network; - National monitoring body: Osservatorio foreste dell'INEA. Risk assessment Specified risk for maintenance of soil quality, as soil quality may be affected by forestry operations in some lots up in the mountains, where operations are performed over slopes. Low risk for maintenance of biodiversity. Mitigation Measures Field visits are performed during and after the field work to check compliance to soil quality maintenance; in case on non-compliance, the supplier is notified and instructed on how to solve the problem within a period of time. If the problem is not solved, the supplier is temporarily invalidated, and the lot is rejected.
(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	Regional/Provincial law enforcement provides strict rules about harvesting levels (for instance percentage of cutting, number of plants to be released, etc.) and they are mandatory. Forest owners and managers must apply for a felling licence or for approval of a forest management plan by the local authority. These applications, when approved, are mandatory about harvesting levels. In a few limited cases, a higher harvesting level may be justified by the authorization process according to specific aims (for instance river banks cuttings related to trees that may fall into the river and create a problem downstream), but it's a tiny percentage over a constant huge increase in forest cover in all Italy, more than 25% in the last 30 years. The last Report about forests state and Forestry sector in Italy 2018 states that inventory of forests in Italy has developed an important increase in every forest type and only less than 1/5 of the annual increase was sourced as timber. Means of verification - National and Regional/Provincial Laws and Forestry Regulations; - Report about forests state and Forestry sector in Italy 2018 (Rapporto sullo stato delle foreste e del settore forestale in Italia); - Data about wood stock and wood sourcing at regional level. Risk assessment Low risk
(vi)¹ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(a) primary forest and other wooded land and old growth forest, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located. If there is no definition of old growth forest at the national level, then the following definition shall apply: A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.</i>	
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	Harvesting permits may have been issued for a forest lot plot that was: primary forest and other wooded land and old growth forest in January 2008 and then was deforested and re-forested afterwards or a poplar plantation may be now on a plot of land that was pprimary forest and other wooded land and old growth forest

	before 2008. Means of verification Public satellite images before 2008 and afterwards Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was a primary forest and other wooded land and old growth forest before 2008 on the forest lot.
(vi)² That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(b) highly biodiverse forest and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.</i>	
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	Harvesting permits may have been issued for a forest lot plot that was: highly biodiverse forest and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority in January 2008 and then was deforested and re-forested afterwards or a poplar plantation may be now on a plot of land that was primary forest and other wooded land and old growth forest before 2008. Means of verification Public satellite images before 2008 and afterwards Harvesting permits details Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was highly biodiverse forest and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority before 2008 on the forest lot.
(vi)³ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(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.</i>	
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	Harvesting permits may have been issued for a forest lot plot that was: highly biodiverse grassland spanning more than one hectare in January 2008 and then was deforested and re-forested afterwards or a poplar plantation may be now on a plot of land that was highly biodiverse grassland spanning more than one hectare

	before 2008. Means of verification Public satellite images before 2008 and afterwards Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was highly biodiverse grassland spanning more than one hectare before 2008 on the forest lot.
(vi)⁴ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(e) heathland - Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).</i>	
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	Harvesting permits may have been issued for a forest lot plot that was: heathland in January 2008 and then was deforested and reforested afterwards or a poplar plantation may be now on a plot of land that was heathland before 2008. Means of verification Public satellite images before 2008 and afterwards Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was a heathland before 2008 on the forest lot.
(vi)⁵ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (4): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:</i> <i>(a) wetlands, namely land that is covered with or saturated by water permanently or for a significant part of the year (NOTE: Evidence of verification of wetlands should reflect seasonal changes within a year).</i>	
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	Harvesting permits may have been issued for a forest lot plot that was: wetland in January 2008 and then was deforested and reforested afterwards or a poplar plantation may be now on a plot of land that was wetland before 2008. Means of verification Public satellite images before 2008 and afterwards Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was a wetland before 2008 on the forest lot.
(vi)⁶ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under	

the same conditions of determination of the status of land specified in those paragraphs.

*Article 29 (5): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was **peatland** in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.*

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Harvesting permits may have been issued for a forest lot plot that was: peatland in January 2008 and then was deforested and reforested afterwards or a poplar plantation may be now on a plot of land that was peatland before 2008. Means of verification Public satellite images before 2008 and afterwards Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was a peatland before 2008 on the forest lot.
(vii) that installations producing biomass fuels from forest biomass, issue a statement of assurance, underpinned by company-level internal processes, for the purpose of the audits conducted pursuant to Article 30(3), that the forest biomass is not sourced from the lands referred to in point (vi).	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	<i>Not applicable, requirement only applies to Level A</i>

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 EU RED Supply Base Evaluation is used

Country	Italy
Area	Emilia-Romagna
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 Italy there is a cadastre system in place (Catasto) that provides spatial boundaries information and land rights about each plot of land, including forests (both public and private). Each cadastral unit has a unique identifier as follows: municipality (Comune), Sheet (Foglio), parcel (Particella, that has a surface in hectares). 'Catasto' is run by the Tax Agency ("Agenzia delle Entrate"), that operates under the control of the Ministry of Economy and Finance. Data are publicly available. Private forests land tenure and management rights are publicly reported within the ownership documents ('atto di provenienza'), provided by the Registry Office (Ufficio del Registro) that is also part of the Tax Agency. Public forests are managed by Regions/Provinces and management rules follow specific regulations defined by specific Regional/Provincial Forestry Laws. According to national Decree n. 3267/1923, art. 130, public forests (i.e. State, Regional and Municipal) shall be managed in compliance with formally approved Forest management plans (Piani di assestamento); once approved these plans become binding. For private forests each Region regulates harvesting permits, that must be issued for cutting trees within a forest, except few cases such as collecting firewood for the amount annual needed by the family of the owner); harvesting permits include detailed rules about numbers or percentage of trees that can be felled (and/or released, depending on the case) and other issues related to HCV, like biodiversity, microhabitats, cultural and historical values protection if any, etc. Harvesting in a forest in all Italy is regulated both by national and regional/provincial laws. There is indeed another level of control, since in Italy all land plots that may be included in the regional definition of "forest" are also protected as a landscape element since 1985 (this protection was re-assured by the Code of cultural heritage and landscape 2004, Law Decree no. 42/2004, art. 142, comma 1, lett. g); consequently, a clear cut or an authorized cut or a non-compliant cut may result also as a criminal offence, because it is considered as an environmental damage that also affects landscape. European Timber Regulation (Reg. UE 995/2010 - Due Diligence) applies in all Italy and a national Register (RIL=Registro Imprese Legno) platform was created for all operators that are obliged to be recorded. Forest operations and EUTR enforcement are supervised in Italy by the army of Gruppo Carabinieri Forestale that have functions of rural police; very expensive fines apply for non-conformity in felling within a forest and EUTR requirements. Duferco Biomasse signs a contract with each supplier, that includes clauses to provide evidence of legality in the harvesting operations and traceability (including cadastral units), up to the owner of the forest. This

	is also a requirement by Ministry Decree 2 March 2010 (Decreto Ministeriale delle Politiche Agricole Alimentari e Forestali del 2 marzo 2010) that establish strict rules for traceability of all biomass that is delivered to power plants in Italy. As European Timber Regulation - Reg. UE 995/2010 (Due Diligence) requirements also apply, access to information is also regulated in the contract between Duferco Biomasse and its suppliers. No royalties nor taxes are due for harvesting timber of any kind in Italy, but Duferco Biomasse requires the statement of social security non-debt (DURC) for each supplier every 4 months; the statement is issued by the national institute of social security (INPS). VAT, when due, is paid monthly or every quarter of year, following a compensation calculation (VAT debit minus VAT credit). A concession fee/auction price may be paid for harvesting public forests, following the authorization process, and this document is also required by Duferco Biomasse to provide evidence of legality. Means of verification - Cadastral references in harvesting permits and contracts - Harvesting permits or Forest Managements Plan - RIL (Registro Imprese Legno) National registry of wood operators - Signed contracts between Duferco Biomasse and suppliers and between suppliers and owners/land managers. - Self-Declarations regulated by Ministry Decree 2 March 2010 - Other authorizations/documents collected in Duferco Biomasse archive. Risk assessment Low risk
(ii) Forest regeneration of harvested areas	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	In Italy the National forest law is Law Decree no. 34/2008, that states at art. 7 that natural or artificial regeneration of each forest after felling must be protected/provided; as a consequence, the Regional/Provincial Forestry Regulations include mandatory rules for each forest type, in order to achieve the natural regeneration or either artificial regeneration. Natural regeneration must be protected in any felling within a forest. Regeneration of the forest should be achieved in a continuous and natural way, limiting the use of artificial regeneration only to cases of lack of natural regeneration, always with autochthonous species. Clear cut is forbidden in any case, unless for phytosanitary reasons, under a mandatory project of re-planting or natural regeneration, that is supervised by public authority. Forest operations and EUTR enforcement are supervised in Italy by the

	army of Gruppo Carabinieri Forestale that have functions of rural police; very expensive fines apply for non-conformity in case of disrespect of regeneration and re-planting rules. Evidence of compliance about regeneration of the forest is collected by Duferco Biomasse for each forest lot, such as field visit reports and surveys by public authority. Means of verification - Harvesting permits or Forest Managements Plan - Regional/Provincial public data and reports - Italy National Forests report (RAF) 2019 Risk assessment Low risk
(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grasslands, heathland and peatlands, are protected with the aim of preserving biodiversity and preventing habitat destruction, unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	UE Biodiversity information System provide information that 21.4% of terrestrial area of Italy is designated as protected areas, which is below the EU average value of 26.4%. Considering that Italy has a limited surface of land territory and, on the contrary, a high density of population, the average data of 21.4% can be considered as a good result. Following the European Habitat Directive 92/43/CEE, in Italy 19.38% of terrestrial area was identified as Nature 2000 sites and further 6.35% of marine areas are also Nature 2000 sites. In Emilia-Romagna the values are 11.86% (terrestrial area) and 16.04% (marine area) . Following National Laws and Regional/Provincial Laws, surfaces and boundaries of areas of high conservation value are clearly mapped. The National Law no. 394/1991 defines criteria and protective measures in identifying and then managing protected areas in Italy. Three main categories of protected areas may be established: 1- national parks, 2- regional and trans-regional natural parks, 3- natural and special reserves. Furthermore, Decree no. 357/1997 (together with the Ministerial Decree of 17 October 2007) defines the main criteria for the identification and management of the Sites of Community Importance (SCI) following to European Directive 92/43 D. n. 357/1997. The Decree delegates to the

	Regions or autonomous provinces the task of identifying SCIs within their territories and provide all information to the Ministry of Environment. According to L. no. 394/1991, management of natural reserves and parks shall be in compliance with a detailed Management Plan (“Piano d’Area”) developed by the park or reserve managing authority and approved by the Ministry. According to art. 21 of the same law, the State Forestry Corps (now under Carabinieri Army) are responsible for performing controls in parks and in the natural reserves about forest management activities. Evidence of compliance about respect of protected areas is collected by Duferco Biomasse for each forest lot, such as field visit reports and surveys by public authority. Means of verification - EU Natura 2000 Network (Habitat Directive 92/43/CEE); - National and Regional Laws; - Harvesting permits or Forest Managements Plan, Park authorization, Incidence evaluation, other permits to operate within the protected areas; - Regional/provincial and national databases and geoportals that identify and map the protected areas and habitats. Risk assessment Low risk
(iv) that harvesting is carried out considering the maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth forests as defined in the country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located, and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with requirements to use logging systems that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and habitats	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	As forestry operations might damage the soil structure, the Regional/Provincial Forestry Regulation have detailed rules about prevention of erosion, but still in each lot erosion may happen due to machinery operativity over slopes. A study by the University of Florence named “Good practices for the reduction of impacts during logging operations” resulted in a leaflet that is a good start for training about reducing potential damage to soil. About impact on biodiversity, the regulations and the surveillance procedures carried out by the Italian Regions/Provinces are detailed and biodiversity is well monitored and protected, through established rules called “Misura di Conservazione” (conservation measures).

	Protected areas cannot decrease, but only increase in surface and/or number of protected HCV, including biodiversity; this means that mandatory rules are issued for forest works that assure at least maintenance of HCV, but also enhancement (for instance conservation and regeneration of rare species). The objective of the parks and the network of reserves and sites is in any case the conservation, recovery and enhancement of the natural and environmental characteristics of the territory, with particular reference to habitats, species, natural emergencies and biodiversity. The activity inside the parks and reserves is regulated through specific regulations. Every protected area has got a specific planning called “Piano d’Area” that details measures and operations about conservations goals and enhancement; the management body of the protected area is in charge of implementation and monitoring. Further monitoring are performed both at European level (European Forest Damage Monitoring Network) and at national level by INEA (National Institute of Agricultural Economics- Forest Observatory), ensuring additional level of control. Evidence of compliance is collected by Duferco Biomasse for each forest lot within the managing program, including upload of authorization documents. Means of verification - Approved documents “Conservation measures” (“Misure di Conservazione”) for each area - National and Regional/Provincial Laws and Forestry Regulations; - Harvesting permits or Forest Managements Plan; - National and Regional Geoportals; - Project SkiddForw by University of Florence; - European Forest Damage Monitoring Network; - National monitoring body: Osservatorio foreste dell'INEA. Risk assessment Specified risk for maintenance of soil quality, as soil quality may be affected by forestry operations in some lots up in the mountains, where operations are performed over slopes. Low risk for maintenance of biodiversity. Mitigation Measures Field visits are performed during and after the field work to check compliance to soil quality maintenance; in case on non-compliance, the supplier is notified and instructed on how to solve the problem within a period of time. If the problem is not solved, the supplier is temporarily invalidated, and the lot is rejected.
(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	Regional law enforcement provides strict rules about harvesting levels (for instance percentage of cutting, number of plants to be released, etc.) and they are mandatory. Forest owners and managers must apply for a felling licence or for approval of a forest management plan by the local authority. These applications, when approved, are mandatory about harvesting levels. In a few limited cases, a higher harvesting level may be justified by the authorization process according to specific aims (for instance river banks cuttings related to trees that may fall into the river and create a problem downstream), but it's a tiny percentage over a constant huge increase in forest cover in all Italy, more than 25% in the last 30 years. The last Report about forests state and Forestry sector in Italy 2018 states that inventory of forests in Italy has developed an important increase in every forest type and only less than 1/5 of the annual increase was sourced as timber. Means of verification - National and Regional Laws and Forestry Regulations; - Report about forests state and Forestry sector in Italy 2018 (Rapporto sullo stato delle foreste e del settore forestale in Italia); - Data about wood stock and wood sourcing at regional level. Risk assessment Low risk
(vi)¹ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(a) primary forest and other wooded land and old growth forest, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located. If there is no definition of old growth forest at the national level, then the following definition shall apply: A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.</i>	
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	Harvesting permits may have been issued for a forest lot plot that was: primary forest and other wooded land and old growth forest in January 2008 and then was deforested and re-forested afterwards or a poplar plantation may be now on a plot of land that was pprimary forest and other wooded land and old growth forest

	before 2008. Means of verification Public satellite images before 2008 and afterwards Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was a primary forest and other wooded land and old growth forest before 2008 on the forest lot.
(vi)² That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(b) highly biodiverse forest and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.</i>	
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	Harvesting permits may have been issued for a forest lot plot that was: highly biodiverse forest and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority in January 2008 and then was deforested and re-forested afterwards or a poplar plantation may be now on a plot of land that was primary forest and other wooded land and old growth forest before 2008. Means of verification Public satellite images before 2008 and afterwards Harvesting permits details Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was highly biodiverse forest and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority before 2008 on the forest lot.
(vi)³ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(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.</i>	
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	Harvesting permits may have been issued for a forest lot plot that was: highly biodiverse grassland spanning more than one hectare in January 2008 and then was deforested and re-forested afterwards or a poplar plantation may be now on a plot of land that was highly biodiverse grassland spanning more than one hectare

	before 2008. Means of verification Public satellite images before 2008 and afterwards Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was highly biodiverse grassland spanning more than one hectare before 2008 on the forest lot.
(vi)⁴ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(e) heathland - Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).</i>	
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	Harvesting permits may have been issued for a forest lot plot that was: heathland in January 2008 and then was deforested and reforested afterwards or a poplar plantation may be now on a plot of land that was heathland before 2008. Means of verification Public satellite images before 2008 and afterwards Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was a heathland before 2008 on the forest lot.
(vi)⁵ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (4): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:</i> <i>(a) wetlands, namely land that is covered with or saturated by water permanently or for a significant part of the year (NOTE: Evidence of verification of wetlands should reflect seasonal changes within a year).</i>	
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	Harvesting permits may have been issued for a forest lot plot that was: wetland in January 2008 and then was deforested and reforested afterwards or a poplar plantation may be now on a plot of land that was wetland before 2008. Means of verification Public satellite images before 2008 and afterwards Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was a wetland before 2008 on the forest lot.
(vi)⁶ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under	

the same conditions of determination of the status of land specified in those paragraphs.

*Article 29 (5): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was **peatland** in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.*

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Harvesting permits may have been issued for a forest lot plot that was: peatland in January 2008 and then was deforested and reforested afterwards or a poplar plantation may be now on a plot of land that was peatland before 2008. Means of verification Public satellite images before 2008 and afterwards Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was a peatland before 2008 on the forest lot.
(vii) that installations producing biomass fuels from forest biomass, issue a statement of assurance, underpinned by company-level internal processes, for the purpose of the audits conducted pursuant to Article 30(3), that the forest biomass is not sourced from the lands referred to in point (vi).	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	<i>Not applicable, requirement only applies to Level A</i>

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 EU RED Supply Base Evaluation is used

Country	Italy
Area	Lombardy
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 Italy there is a cadastre system in place (Catasto) that provides spatial boundaries information and land rights about each plot of land, including forests (both public and private). Each cadastral unit has a unique identifier as follows: municipality (Comune), Sheet (Foglio), parcel (Particella, that has a surface in hectares). 'Catasto' is run by the Tax Agency ("Agenzia delle Entrate"), that operates under the control of the Ministry of Economy and Finance. Data are publicly available. Private forests land tenure and management rights are publicly reported within the ownership documents ('atto di provenienza'), provided by the Registry Office (Ufficio del Registro) that is also part of the Tax Agency. Public forests are managed by Regions and managements rules follow specific regulations defined by specific Regional Forestry Laws. According to national Decree n. 3267/1923, art. 130, public forests (i.e. State, Regional and Municipal) shall be managed in compliance with formally approved Forest management plans (Piani di assestamento); once approved these plans become binding. For private forests each Region regulates harvesting permits, that must be issued for cutting trees within a forest, except few cases such as collecting firewood for the amount annual needed by the family of the owner); harvesting permits include detailed rules about numbers or percentage of trees that can be felled (and/or released, depending on the case) and other issues related to HCV, like biodiversity, microhabitats, cultural and historical values protection if any, etc. Harvesting in a forest in all Italy is regulated both by national and regional/provincial laws. There is indeed another level of control, since in Italy all land plots that may be included in the regional definition of "forest" are also protected as a landscape element since 1985 (this protection was re-assured by the Code of cultural heritage and landscape 2004, Law Decree no. 42/2004, art. 142, comma 1, lett. g); consequently, a clear cut or an authorized cut or a non-compliant cut may result also as a criminal offence, because it is considered as an environmental damage that also affects landscape. European Timber Regulation (Reg. UE 995/2010 - Due Diligence) applies in all Italy and a national Register (RIL=Registro Imprese Legno) platform was created for all operators that are obliged to be recorded. Forest operations and EUTR enforcement are supervised in Italy by the army of Gruppo Carabinieri Forestale that have functions of rural police; very expensive fines apply for non-conformity in felling within a forest and EUTR requirements. Duferco Biomasse signs a contract with each supplier, that includes clauses to provide evidence of legality in the harvesting operations and traceability (including cadastral units), up to the owner of the forest. This

	is also a requirement by Ministry Decree 2 March 2010 (Decreto Ministeriale delle Politiche Agricole Alimentari e Forestali del 2 marzo 2010) that establish strict rules for traceability of all biomass that is delivered to power plants in Italy. As European Timber Regulation - Reg. UE 995/2010 (Due Diligence) requirements also apply, access to information is also regulated in the contract between Duferco Biomasse and its suppliers. No royalties nor taxes are due for harvesting timber of any kind in Italy, but Duferco Biomasse requires the statement of social security non-debt (DURC) for each supplier every 4 months; the statement is issued by the national institute of social security (INPS). VAT, when due, is paid monthly or every quarter of year, following a compensation calculation (VAT debit minus VAT credit). A concession fee/auction price may be paid for harvesting public forests, following the authorization process, and this document is also required by Duferco Biomasse to provide evidence of legality. Means of verification - Cadastral references in harvesting permits and contracts - Harvesting permits or Forest Managements Plan - RIL (Registro Imprese Legno) National registry of wood operators - Signed contracts between Duferco Biomasse and suppliers and between suppliers and owners/land managers. - Self-Declarations regulated by Ministry Decree 2 March 2010 - Other authorizations/documents collected in Duferco Biomasse archive. Risk assessment Low risk
(ii) Forest regeneration of harvested areas	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	In Italy the National forest law is Law Decree no. 34/2008, that states at art. 7 that natural or artificial regeneration of each forest after felling must be protected/provided; as a consequence, the Regional/Provincial Forestry Regulations include mandatory rules for each forest type, in order to achieve the natural regeneration or either artificial regeneration Natural regeneration must be protected in any felling within a forest. Regeneration of the forest should be achieved in a continuous and natural way, limiting the use of artificial regeneration only to cases of lack of natural regeneration, always with autochthonous species. Clear cut is forbidden in any case, unless for phytosanitary reasons, under a mandatory project of re-planting or natural regeneration, that is supervised by public authority.

	Forest operations and EUTR enforcement are supervised in Italy by the army of Gruppo Carabinieri Forestale that have functions of rural police; very expensive fines apply for non-conformity in case of disrespect of regeneration and re-planting rules. Evidence of compliance about regeneration of the forest is collected by Duferco Biomasse for each forest lot, such as field visit reports and surveys by public authority. Means of verification - Harvesting permits or Forest Managements Plan - Regional/Provincial Public data and reports - Italy National Forests report (RAF) 2019 Risk assessment Low risk
(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grasslands, heathland and peatlands, are protected with the aim of preserving biodiversity and preventing habitat destruction, unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	UE Biodiversity information System provide information that 21.4% of terrestrial area of Italy is designated as protected areas, which is below the EU average value of 26.4%. Considering that Italy has a limited surface of land territory and, on the contrary, a high density of population, the average data of 21.4% can be considered as a good result. Following the European Habitat Directive 92/43/CEE, in Italy 19.38% of terrestrial area was identified as Nature 2000 sites and further 6.35% of marine areas are also Nature 2000 sites. In Lombardy the value of terrestrial area is 15.65% and no marine area. Following National Laws and Regional/Provincial Laws, surfaces and boundaries of areas of high conservation value are clearly mapped. The National Law no. 394/1991 defines criteria and protective measures in identifying and then managing protected areas in Italy. Three main categories of protected areas may be established: 1- national parks, 2- regional and trans-regional natural parks, 3- natural and special reserves. Furthermore, Decree no. 357/1997 (together with the Ministerial Decree of 17 October 2007) defines the main criteria for the identification and management of the Sites of Community Importance (SCI) following to European Directive 92/43 D. n. 357/1997. The Decree delegates to the

	Regions or autonomous provinces the task of identifying SCIs within their territories and provide all information to the Ministry of Environment. According to L. no. 394/1991, management of natural reserves and parks shall be in compliance with a detailed Management Plan (“Piano d’Area”) developed by the park or reserve managing authority and approved by the Ministry. According to art. 21 of the same law, the State Forestry Corps (now under Carabinieri Army) are responsible for performing controls in parks and in the natural reserves about forest management activities. Evidence of compliance about respect of protected areas is collected by Duferco Biomasse for each forest lot, such as field visit reports and surveys by public authority. Means of verification - EU Natura 2000 Network (Habitat Directive 92/43/CEE); - National and Regional/Provincial Laws; - Harvesting permits or Forest Managements Plan, Park authorization, Incidence evaluation, other permits to operate within the protected areas; - Regional/provincial and national databases and geoportals that identify and map the protected areas and habitats. Risk assessment Low risk
(iv) that harvesting is carried out considering the maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth forests as defined in the country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located, and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with requirements to use logging systems that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and habitats	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	As forestry operations might damage the soil structure, the Regional Forestry Regulation have detailed rules about prevention of erosion, but still in each lot erosion may happen due to machinery operativity over slopes. A study by the University of Florence named “Good practices for the reduction of impacts during logging operations” resulted in a leaflet that is a good start for training about reducing potential damage to soil. About impact on biodiversity, the regulations and the surveillance procedures carried out by the Italian Regions/Provinces are detailed and biodiversity is well monitored and protected, through established rules called “Misura di Conservazione” (conservation measures).

	Protected areas cannot decrease, but only increase in surface and/or number of protected HCV, including biodiversity; this means that mandatory rules are issued for forest works that assure at least maintenance of HCV, but also enhancement (for instance conservation and regeneration of rare species). The objective of the parks and the network of reserves and sites is in any case the conservation, recovery and enhancement of the natural and environmental characteristics of the territory, with particular reference to habitats, species, natural emergencies and biodiversity. The activity inside the parks and reserves is regulated through specific regulations. Every protected area has got a specific planning called “Piano d’Area” that details measures and operations about conservations goals and enhancement; the management body of the protected area is in charge of implementation and monitoring. Further monitoring are performed both at European level (European Forest Damage Monitoring Network) and at national level by INEA (National Institute of Agricultural Economics- Forest Observatory), ensuring additional level of control. Evidence of compliance is collected by Duferco Biomasse for each forest lot within the managing program, including upload of authorization documents. Means of verification - Approved documents “Conservation measures” (“Misure di Conservazione”) for each area - National and Regional/Provincial Laws and Forestry Regulations; - Harvesting permits or Forest Managements Plan; - National and Regional Geoportals; - Project SkiddForw by University of Florence; - European Forest Damage Monitoring Network; - National monitoring body: Osservatorio foreste dell'INEA. Risk assessment Specified risk for maintenance of soil quality, as soil quality may be affected by forestry operations in some lots up in the mountains, where operations are performed over slopes. Low risk for maintenance of biodiversity. Mitigation Measures Field visits are performed during and after the field work to check compliance to soil quality maintenance; in case on non-compliance, the supplier is notified and instructed on how to solve the problem within a period of time. If the problem is not solved, the supplier is temporarily invalidated, and the lot is rejected.
(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	Regional law enforcement provides strict rules about harvesting levels (for instance percentage of cutting, number of plants to be released, etc.) and they are mandatory. Forest owners and managers must apply for a felling licence or for approval of a forest management plan by the local authority. These applications, when approved, are mandatory about harvesting levels. In a few limited cases, a higher harvesting level may be justified by the authorization process according to specific aims (for instance river banks cuttings related to trees that may fall into the river and create a problem downstream), but it's a tiny percentage over a constant huge increase in forest cover in all Italy, more than 25% in the last 30 years. The last Report about forests state and Forestry sector in Italy 2018 states that inventory of forests in Italy has developed an important increase in every forest type and only less than 1/5 of the annual increase was sourced as timber. Means of verification - National and Regional/Provincial Laws and Forestry Regulations; - Report about forests state and Forestry sector in Italy 2018 (Rapporto sullo stato delle foreste e del settore forestale in Italia); - Data about wood stock and wood sourcing at regional level. Risk assessment Low risk
(vi)¹ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(a) primary forest and other wooded land and old growth forest, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located. If there is no definition of old growth forest at the national level, then the following definition shall apply: A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.</i>	
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	Harvesting permits may have been issued for a forest lot plot that was: primary forest and other wooded land and old growth forest in January 2008 and then was deforested and re-forested afterwards or a poplar plantation may be now on a plot of land that was pprimary forest and other wooded land and old growth forest

	before 2008. Means of verification Public satellite images before 2008 and afterwards Risk assessment Specified risk
(vi)² That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(b) highly biodiverse forest and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.</i>	
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	Harvesting permits may have been issued for a forest lot plot that was: highly biodiverse forest and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority in January 2008 and then was deforested and re-forested afterwards or a poplar plantation may be now on a plot of land that was primary forest and other wooded land and old growth forest before 2008. Means of verification Public satellite images before 2008 and afterwards Harvesting permits details Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was highly biodiverse forest and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority before 2008 on the forest lot.
(vi)³ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(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.</i>	
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	Harvesting permits may have been issued for a forest lot plot that was: highly biodiverse grassland spanning more than one hectare in January 2008 and then was deforested and re-forested afterwards or a poplar plantation may be now on a plot of land that was highly biodiverse grassland spanning more than one hectare before 2008. Means of verification Public satellite images before 2008 and afterwards Risk

	assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was highly biodiverse grassland spanning more than one hectare before 2008 on the forest lot.
(vi)⁴ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(e) heathland - Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).</i>	
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	Harvesting permits may have been issued for a forest lot plot that was: heathland in January 2008 and then was deforested and reforested afterwards or a poplar plantation may be now on a plot of land that was heathland before 2008. Means of verification Public satellite images before 2008 and afterwards Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was a heathland before 2008 on the forest lot.
(vi)⁵ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (4): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:</i> <i>(a) wetlands, namely land that is covered with or saturated by water permanently or for a significant part of the year (NOTE: Evidence of verification of wetlands should reflect seasonal changes within a year).</i>	
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	Harvesting permits may have been issued for a forest lot plot that was: wetland in January 2008 and then was deforested and reforested afterwards or a poplar plantation may be now on a plot of land that was wetland before 2008. Means of verification Public satellite images before 2008 and afterwards Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was a wetland before 2008 on the forest lot.
(vi)⁶ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.	

*Article 29 (5): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was **peatland** in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.*

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Harvesting permits may have been issued for a forest lot plot that was: peatland in January 2008 and then was deforested and reforested afterwards or a poplar plantation may be now on a plot of land that was peatland before 2008. Means of verification Public satellite images before 2008 and afterwards Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was a peatland before 2008 on the forest lot.
(vii) that installations producing biomass fuels from forest biomass, issue a statement of assurance, underpinned by company-level internal processes, for the purpose of the audits conducted pursuant to Article 30(3), that the forest biomass is not sourced from the lands referred to in point (vi).	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Not applicable, requirement only applies to Level A

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

Countries where EU RED Supply Base Evaluation is used	
Country	Italy
Area	Veneto
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 Italy there is a cadastre system in place (Catasto) that provides spatial boundaries information and land rights about each plot of land, including forests (both public and private). Each cadastral unit has a unique identifier as follows: municipality (Comune), Sheet (Foglio), parcel (Particella, that has a surface in hectares). 'Catasto' is run by the Tax Agency ("Agenzia delle Entrate"), that operates under the control of the Ministry of Economy and Finance. Data are publicly available. Private forests land tenure and management rights are publicly reported within the ownership documents ('atto di provenienza'), provided by the Registry Office (Ufficio del Registro) that is also part of the Tax Agency. Public forests are managed by Regions and managements rules follow specific regulations defined by specific Regional Forestry Laws. According to national Decree n. 3267/1923, art. 130, public forests (i.e. State, Regional and Municipal) shall be managed in compliance with formally approved Forest management plans (Piani di assestamento); once approved these plans become binding. For private forests each Region regulates harvesting permits, that must be issued for cutting trees within a forest, except few cases such as collecting firewood for the amount annual needed by the family of the owner); harvesting permits include detailed rules about numbers or percentage of trees that can be felled (and/or released, depending on the case) and other issues related to HCV, like biodiversity, microhabitats, cultural and historical values protection if any, etc. Harvesting in a forest in all Italy is regulated both by national and regional/provincial laws. There is indeed another level of control, since in Italy all land plots that may be included in the regional definition of "forest" are also protected as a landscape element since 1985 (this protection was re-assured by the Code of cultural heritage and landscape 2004, Law Decree no. 42/2004, art. 142, comma 1, lett. g); consequently, a clear cut or an authorized cut or a non-compliant cut may result also as a criminal offence, because it is considered as an environmental damage that also affects landscape. European Timber Regulation (Reg. UE 995/2010 - Due Diligence) applies in all Italy and a national Register (RIL=Registro Imprese Legno) platform was created for all operators that are obliged to be recorded. Forest operations and EUTR enforcement are supervised in Italy by the army of Gruppo Carabinieri Forestale that have functions of rural police; very expensive fines apply for non-conformity in felling within a forest and EUTR requirements. Duferco Biomasse signs a contract with each supplier, that includes clauses to provide evidence of legality in the harvesting operations and traceability (including cadastral units), up to the owner of the forest. This is also a requirement by Ministry Decree 2 March 2010 (Decreto Ministeriale delle Politiche Agricole Alimentari e Forestali del 2 marzo

	2010) that establish strict rules for traceability of all biomass that is delivered to power plants in Italy. As European Timber Regulation - Reg. UE 995/2010 (Due Diligence) requirements also apply, access to information is also regulated in the contract between Duferco Biomasse and its suppliers. No royalties nor taxes are due for harvesting timber of any kind in Italy, but Duferco Biomasse requires the statement of social security non-debt (DURC) for each supplier every 4 months; the statement is issued by the national institute of social security (INPS). VAT, when due, is paid monthly or every quarter of year, following a compensation calculation (VAT debit minus VAT credit). A concession fee/auction price may be paid for harvesting public forests, following the authorization process, and this document is also required by Duferco Biomasse to provide evidence of legality. Means of verification - Cadastral references in harvesting permits and contracts - Harvesting permits or Forest Managements Plan - RIL (Registro Imprese Legno) National registry of wood operators - Signed contracts between Duferco Biomasse and suppliers and between suppliers and owners/land managers. - Self-Declarations regulated by Ministry Decree 2 March 2010 - Other authorizations/documents collected in Duferco Biomasse archive. Risk assessment Low risk
(ii) Forest regeneration of harvested areas	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	In Italy the National forest law is Law Decree no. 34/2008, that states at art. 7 that natural or artificial regeneration of each forest after felling must be protected/provided; as a consequence, the Regional Forestry Regulations include mandatory rules for each forest type, in order to achieve the natural regeneration or either artificial regeneration. Natural regeneration must be protected in any felling within a forest. Regeneration of the forest should be achieved in a continuous and natural way, limiting the use of artificial regeneration only to cases of lack of natural regeneration, always with autochthonous species. Clear cut is forbidden in any case, unless for phytosanitary reasons, under a mandatory project of re-planting or natural regeneration, that is supervised by public authority. Forest operations and EUTR enforcement are supervised in Italy by the army of Gruppo Carabinieri Forestale that have functions of rural police;

	very expensive fines apply for non-conformity in case of disrespect of regeneration and re-planting rules. Evidence of compliance about regeneration of the forest is collected by Duferco Biomasse for each forest lot, such as field visit reports and surveys by public authority. Means of verification - Harvesting permits or Forest Managements Plan - Regional public data and reports - Italy National Forests report (RAF) 2019 Risk assessment Low risk
(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grasslands, heathland and peatlands, are protected with the aim of preserving biodiversity and preventing habitat destruction, unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	UE Biodiversity information System provide information that 21.4% of terrestrial area of Italy is designated as protected areas, which is below the EU average value of 26.4%. Considering that Italy has a limited surface of land territory and, on the contrary, a high density of population, the average data of 21.4% can be considered as a good result. Following the European Habitat Directive 92/43/CEE, in Italy 19.38% of terrestrial area was identified as Nature 2000 sites and further 6.35% of marine areas are also Nature 200 sites. Veneto has got 22.58% terrestrial area plus 7.54% marine area as protected, taht is over 30% of the regional territory. Following National Laws and Regional Laws, surfaces and boundaries of areas of high conservation value are clearly mapped. The National Law no. 394/1991 defines criteria and protective measures in identifying and then managing protected areas in Italy. Three main categories of protected areas may be established: 1- national parks, 2- regional and trans-regional natural parks, 3- natural and special reserves. Furthermore, Decree no. 357/1997 (together with the Ministerial Decree of 17 October 2007) defines the main criteria for the identification and management of the Sites of Community Importance (SCI) following to European Directive 92/43 D. n. 357/1997. The Decree delegates to the Regions or autonomous provinces the task of identifying SCIs within their territories and provide all information to the Ministry of Environment.

	According to L. no. 394/1991, management of natural reserves and parks shall be in compliance with a detailed Management Plan (“Piano d’Area”) developed by the park or reserve managing authority and approved by the Ministry. According to art. 21 of the same law, the State Forestry Corps (now under Carabinieri Army) are responsible for performing controls in parks and in the natural reserves about forest management activities. Evidence of compliance about respect of protected areas is collected by Duferco Biomasse for each forest lot, such as field visit reports and surveys by public authority. Means of verification - EU Natura 2000 Network (Habitat Directive 92/43/CEE); - National and Regional Laws; - Harvesting permits or Forest Managements Plan, Park authorization, Incidence evaluation, other permits to operate within the protected areas; - Regional/provincial and national databases and geoportals that identify and map the protected areas and habitats. Risk assessment Low risk
(iv) that harvesting is carried out considering the maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth forests as defined in the country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located, and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with requirements to use logging systems that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and habitats	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	As forestry operations might damage the soil structure, the Regional Forestry Regulation, but still in each lot erosion may happen due to machinery operativity over slopes. A study by the University of Florence named “Good practices for the reduction of impacts during logging operations” resulted in a leaflet that is a good start for training about reducing potential damage to soil. About impact on biodiversity, the regulations and the surveillance procedures carried out by the Italian Regions are detailed and biodiversity is well monitored and protected, through established rules called “Misure di Conservazione” (conservation measures). Protected areas cannot decrease, but only increase in surface and/or number of protected HCV, including biodiversity; this means that

	mandatory rules are issued for forest works that assure at least maintenance of HCV, but also enhancement (for instance conservation and regeneration of rare species). The objective of the parks and the network of reserves and sites is in any case the conservation, recovery and enhancement of the natural and environmental characteristics of the territory, with particular reference to habitats, species, natural emergencies and biodiversity. The activity inside the parks and reserves is regulated through specific regulations. Every protected area has got a specific planning called “Piano d’Area” that details measures and operations about conservations goals and enhancement; the management body of the protected area is in charge of implementation and monitoring. Further monitoring are performed both at European level (European Forest Damage Monitoring Network) and at national level by INEA (National Institute of Agricultural Economics- Forest Observatory), ensuring additional level of control. Evidence of compliance is collected by Duferco Biomasse for each forest lot within the managing program, including upload of authorization documents. Means of verification - Approved documents “Conservation measures” (“Misure di Conservazione”) for each area - National and Regional/Provincial Laws and Forestry Regulations; - Harvesting permits or Forest Managements Plan; - National and Regional Geoportals; - Project SkiddForw by University of Florence; - European Forest Damage Monitoring Network; - National monitoring body: Osservatorio foreste dell'INEA. Risk assessment Specified risk for maintenance of soil quality, as soil quality may be affected by forestry operations in some lots up in the mountains, where operations are performed over slopes. Low risk for maintenance of biodiversity. Mitigation Measures Field visits are performed during and after the field work to check compliance to soil quality maintenance; in case on non-compliance, the supplier is notified and instructed on how to solve the problem within a period of time. If the problem is not solved, the supplier is temporarily invalidated, and the lot is rejected.
(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	Regional law enforcement provides strict rules about harvesting levels (for instance percentage of cutting, number of plants to be released, etc.) and they are mandatory. Forest owners and managers must apply for a felling licence or for approval of a forest management plan by the local authority. These applications, when approved, are mandatory about harvesting levels. In a few limited cases, a higher harvesting level may be justified by the authorization process according to specific aims (for instance river banks cuttings related to trees that may fall into the river and create a problem downstream), but it's a tiny percentage over a constant huge increase in forest cover in all Italy, more than 25% in the last 30 years. The last Report about forests state and Forestry sector in Italy 2018 states that inventory of forests in Italy has developed an important increase in every forest type and only less than 1/5 of the annual increase was sourced as timber. Means of verification - National and Regional Laws and Forestry Regulations; - Report about forests state and Forestry sector in Italy 2018 (Rapporto sullo stato delle foreste e del settore forestale in Italia); - Data about wood stock and wood sourcing at regional level. Risk assessment Low risk
(vi)¹ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(a) primary forest and other wooded land and old growth forest, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located. If there is no definition of old growth forest at the national level, then the following definition shall apply: A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.</i>	
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	Harvesting permits may have been issued for a forest lot plot that was: primary forest and other wooded land and old growth forest in January 2008 and then was deforested and re-forested afterwards or a poplar plantation may be now on a plot of land that was pprimary forest and other wooded land and old growth forest before 2008. Means of verification Public satellite images before 2008 and afterwards Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not

	sourced by Duferco if there was a primary forest and other wooded land and old growth forest before 2008 on the forest lot.
(vi)² That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(b) highly biodiverse forest and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.</i>	
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	Harvesting permits may have been issued for a forest lot plot that was: highly biodiverse forest and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority in January 2008 and then was deforested and re-forested afterwards or a poplar plantation may be now on a plot of land that was primary forest and other wooded land and old growth forest before 2008. Means of verification Public satellite images before 2008 and afterwards Harvesting permits details Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was highly biodiverse forest and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority before 2008 on the forest lot.
(vi)³ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(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.</i>	
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	Harvesting permits may have been issued for a forest lot plot that was: highly biodiverse grassland spanning more than one hectare in January 2008 and then was deforested and re-forested afterwards or a poplar plantation may be now on a plot of land that was highly biodiverse grassland spanning more than one hectare before 2008. Means of verification Public satellite images before 2008 and afterwards Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not

	sourced by Duferco if there was highly biodiverse grassland spanning more than one hectare before 2008 on the forest lot.
(vi)⁴ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(e) heathland - Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).</i>	
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	Harvesting permits may have been issued for a forest lot plot that was: heathland in January 2008 and then was deforested and reforested afterwards or a poplar plantation may be now on a plot of land that was heathland before 2008. Means of verification Public satellite images before 2008 and afterwards Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was a heathland before 2008 on the forest lot.
(vi)⁵ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (4): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:</i> <i>(a) wetlands, namely land that is covered with or saturated by water permanently or for a significant part of the year (NOTE: Evidence of verification of wetlands should reflect seasonal changes within a year).</i>	
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	Harvesting permits may have been issued for a forest lot plot that was: wetland in January 2008 and then was deforested and reforested afterwards or a poplar plantation may be now on a plot of land that was wetland before 2008. Means of verification Public satellite images before 2008 and afterwards Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was a wetland before 2008 on the forest lot.
(vi)⁶ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (5): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was peatland in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material</i>	

does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Harvesting permits may have been issued for a forest lot plot that was: peatland in January 2008 and then was deforested and reforested afterwards or a poplar plantation may be now on a plot of land that was peatland before 2008. Means of verification Public satellite images before 2008 and afterwards Risk assessment Specified risk Mitigation Measures For each forest lot, evidence is the collection of satellite photographs/view. Biomass is not sourced by Duferco if there was a peatland before 2008 on the forest lot.
(vii) that installations producing biomass fuels from forest biomass, issue a statement of assurance, underpinned by company-level internal processes, for the purpose of the audits conducted pursuant to Article 30(3), that the forest biomass is not sourced from the lands referred to in point (vi).	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	<i>Not applicable, requirement only applies to Level A</i>

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 2a: EU RED II Supply Base Evaluation

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

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

Verification and monitoring of suppliers

The suppliers are sawmills within the Italian Regions of the Supply Base; input of sawmills/wood industries is primary feedstock (logs), that are then processed to become secondary products. Sawmills in Italy are under the rules of the Ministry Decree of 2010 (D.M. 02/03/2010) that requires mandatory book-keeping of input and output and of produced residues for each year. Residues are generated only from machining (cutting and trimming of logs).

Records of volumes for each identified supplier are then kept by Duferco for each delivery of processing residues according to ISCC certification rules. Every delivery is visually inspected at the port where it is unloaded from trucks. Documents of transport and traceability are kept as part of Duferco management system in compliance with EUTR requirements, including deliveries notes, invoices, mass balance report of each sawmill and self-declarations about EU RED compliance. If all documents are collected and fully completed, the load is recorded and unloaded, otherwise is sent back to the supplier, with a written note of non-acceptance on the delivery document.

Feedstock inspection and classification upon receipt

Visual inspection of each truck is performed to confirm that each load is secondary feedstock (as it comes from sawmills); checking of the delivery documents related to each truck are made at the port facility and then cross-checked by Duferco personnel.

All documentary evidence is collected by Duferco office in Genova, where traceability manager and accountants do their due diligence, including compliance with EUTR and 2010 Ministry Decree requirements. Collected documents are: delivery notes of each unload, invoices from supplier, contract with supplier, mass balance reports, self-declarations about feedstock category, chamber of commerce certificate, certificates.

Actions are taken if quantities or information are incorrect, such as official complaint by mail, including defined time of response; if information or data are not rectified in due time, the supplier is temporarily invalidated.

All evidence is collected and available for SBP audits.

Supplier audit for processing residues and post-consumer feedstock

At least once a year, but usually more, a supplier visit for each sawmill (100% sampling) is performed by Duferco personnel in order to verify all aspects of traceability and feedstock quality. A standard report is filled in, regarding evidence reviewed and results, as also required by the ISCC certification; this report and all compliance documents related to the supplier are collected by Duferco.

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

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

Country: Spain - 6 regions in East and South Spain

Article 29 (2): Soil quality and soil carbon

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 law(s) and explanation	N/A
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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	Duferco Biomasse collects biomass in Spain coming from agricultural land (such as branches of pruned trees, end of life fruit trees). In case of pruning there is no impact on soil quality . In case of Short Rotation Coppice there is no impact on soil quality, as only stems are cut. In case of eradication of trees, such as fruit trees or end of cycle SRC, the plots will be cultivated again and soil quality maintained to provide support to the next crop. Evidence about impacts on soil quality are collected for each lot of TOF in a document that is a checklist of indicators that are applicable (Section 2 of Instruction Document 1A). Risk assessment Low risk
(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	When agricultural trees are pruned or stems are cut, some soil carbon is lost, but the loss is then compensated by fertilizers. Spread of fertilizers of any kind is strictly regulated by laws in Spain, descending from EU Regulations. Farmers must be trained and licenced and each spreading within the year must be input in a proper register. When roots are removed, there might be some loss of soil carbon, but new plants cover the lacking spots as part of standard activities, usually in even higher density then before (as new standard procedures in cropping are followed), meaning that soil carbon loss is only temporary. Risk assessment Low risk

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

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

- (a) *primary forest and other wooded land and old growth forest, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located.*

Description of a management system process to meet the requirement.	Biomass from agricultural land may be sourced from a plot that was primary forest or other wooded land or old growth forest in January 2008 and then was deforested and cropped. Primary forests in Europe are collected in a database that can be searched. The ten Spanish primary forests included in the list total only 6,800 hectares (0.01% of Spain's forest area), 100% protected, and the majority are beech forests: - Muniellos (Posada de Rengos, Asturias) - Not specified (Aigüestortes i Estany de Sant Maurici National Park, Lleida) - Caviedes (Oyambre National Park, Cantabria) - Tejada Negra (Ayllón Beech Forests, Guadalajara) - Montejo de la Sierra (Ayllón Beech Forests, Madrid) - Lizardoia (Navarre Beech Forests, Ochagavía, Salazar Valley) - Aztaparreta (Navarre Beech Forests, Isaba, Roncal Valley) - Cuesta Fría (Picos de Europa Beech Forests, León) - Canal de Asotín (Picos de Europa Beech Forests, León) - Poyo de Santo Domingo (Cazorla, Segura and Las Villas National Park). There is no such list for Old Growth Forests in Spain so far. Means of verification https://onlinelibrary.wiley.com/doi/full/10.1111/ddi.12778 https://www.abc.es/ciencia/abci-mapa-bosques-virgenes-persisten-europa-201805291525_noticia.html https://curioso-pornaturalaleza.blogspot.com/2018/06/bosques-primarios-en-europa.html Public satellite images before 2008 and after, collected in a check document. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected (satellite images and maps of primary forests). Duferco Biomasse does not buy the lot if it is included in a land that was a primary forest or other wooded land or old growth forest before 2008.
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Article 29 (3b): Protection of land with high biodiversity value

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

- (b) *highly biodiverse forest and other wooded land which is species-rich and not degraded, or has been identified as*

<i>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;</i>	
Description of a management system process to meet the requirement.	Biomass from agricultural land may be sourced from a plot that was highly biodiverse forest or other wooded land which is species-rich and not degraded or has been identified as being highly biodiverse by the relevant competent authority in January 2008 and then was deforested and cropped. Means of verification Satellite images before 2008. Nature 2000 viewer https://natura2000.eea.europa.eu/ Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected as satellite images and Nature 2000 viewer. Duferco Biomasse does not buy the lot if it is included in a land that was a highly biodiverse forest before 2008.

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

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

- (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 30(4), unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.*
- (i)

Description of a management system process to meet the requirement.	Biomass from agricultural land may be sourced from a plot that was land with a high biodiversity value in January 2008. Public sources must be searched to check 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. Means of verification GRAS database https://gtplus.gras-system.org/ Nature 2000 viewer https://natura2000.eea.europa.eu/ Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected using the following open-source tools: GRAS database and Nature 2000 viewer. Duferco Biomasse does not buy the lot if it is sourced from a land that had high biodiversity value, unless evidence can be provided that harvesting was allowed for nature protection purposes (such as restoration of native species cover).
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Article 29 (3d): Protection of land with high biodiversity value

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

- (c) *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.	Biomass from agricultural land may be sourced from a plot that was: 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 (iii) that is species-rich and not degraded and has been identified as being highly biodiverse by the relevant competent authority. Duferco Biomasse does not source biomass from any grassland, but checkings can be made about previous land use in open-source databases. Means of verification GRAS database https://gtplus.gras-system.org/ Public satellite images before 2008. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected using the following open-source tools: GRAS database and Nature 2000 viewer. Duferco Biomasse does not buy the lot if it is sourced from a previous grassland, unless evidence can be provided that harvesting was allowed to preserve its status as highly biodiverse grassland.
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Article 29 (3e): Protection of land with high biodiversity value

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status: (e) heathland – Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).

Description of a management system process to meet the requirement.	Biomass from agricultural land may be sourced from a plot that was heathland in January 2008 and then became wooded area. Usually, Duferco Biomasse does not source from heathlands, but the land use may be changed. Means of verification GRAS database https://gtplus.gras-system.org/ Public satellite images before 2008. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected using the following open-source tools: GRAS database and Nature 2000 viewer. Duferco Biomasse does not buy the lot if it is sourced from a previous heathland.
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Article 29 (4a): Protection of land with high carbon stock

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:

- (a) *wetlands, namely land that is covered with or saturated by water permanently or for a significant part of the year;*

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.	Biomass from agricultural land may be sourced from a plot that was peatland in January 2008 and now it has not that status anymore or it was drained in some parts. Means of verification Public satellite images before 2008. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected using the following open-source satellite images. Duferco Biomasse does not buy the lot if it is sourced from a previous peatland, even if only drained in some parts.
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Article 29 (4b): Protection of land with high carbon stock

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:

- (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.	Biomass from agricultural land may be sourced from a plot that was 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 in January 2008. For each lot evidence must be collected about the absence of land use conversion from forested area of any kind to agriculture or other use, even authorized. Means of verification Public satellite images
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	before 2008. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected using the following open-source tools: GRAS database and Nature 2000 viewer. Duferco Biomasse does not buy the lot if it is sourced from a continuously forested area with the definition above, that was converted to agriculture or other use.
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Article 29 (4c): Protection of land with high carbon stock

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:

- (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.	Biomass from agricultural land may be sourced from a plot that was land with high-carbon stock (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 the conditions laid down in paragraph 10 of this Article would be fulfilled). For each lot evidence must be collected about the absence of land use change of land with high-carbon stock, even authorized. Means of verification Public satellite images before 2008. Risk assessment Specified risk Mitigation Measures The lot is not sourced by Duferco Biomasse if it comes from a land with high-carbon stock that has changed its status to low-carbon stock.
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Article 29 (5): Protection of peatland

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was peatland in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.

Description of a management system process to meet the requirement.	Biomass from agricultural land may be sourced from a plot that was peatland in January 2008 and now it is no longer a peatland or was drained in some parts. Means of verification Public satellite images before 2008. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected by analysis of satellite images. The lot is not sourced by Duferco Biomasse if it comes from a peatland, a land that was peatland or a partially drained peatland.
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Country: Italy - Tuscany

Article 29 (2): Soil quality and soil carbon

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 law(s) 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 at	Duferco Biomasse collects biomass in Tuscany coming from agricultural land (such as branches of pruned trees, end of life fruit trees) and from urban and landscape (hedges, gardens, etc.). In case of pruning there is no impact on soil quality . In case of Short Rotation Coppice there is no impact on soil quality, as only stems are cut. In case of eradication of trees, such as fruit trees or end of cycle SRC, the plots will be cultivated again and soil quality maintained to provide support to
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economic operator level	the next crop. Evidence about impacts on soil quality are collected for each lot of agricultural TOF in a document that is a checklist of indicators that are applicable (Section 2 of Instruction Document 1A). About urban and landscape TOF this indicator is not applicable. Risk assessment Low risk About urban and landscape TOF this indicator is not applicable.
(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	When agricultural trees are pruned or stems are cut, some soil carbon is lost, but the loss is then compensated by fertilizers. Spread of fertilizers of any kind is strictly regulated by laws in Italy, descending from EU Regulations. Farmers must be trained and licenced and each spreading within the year must be input in a proper register. When roots are removed, there might be some loss of soil carbon, but new plants cover the lacking spots as part of standard activities, usually in even higher density then before (as new standard procedures in cropping are followed), meaning that soil carbon loss is only temporary. Risk assessment Low risk

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

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

- (d) *primary forest and other wooded land and old growth forest, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located.*

Description of a management system process to meet the requirement.

Biomass from agricultural land may be sourced from a plot that was primary forest or other wooded land or old growth forest in January 2008 and then was deforested and cropped. Primary forests in Europe are collected in a database that can be searched. Means of verification <https://onlinelibrary.wiley.com/doi/full/10.1111/ddi.12778> Public satellite images before 2008 and after, collected in a check document. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected (satellite images and maps of primary forests). Duferco Biomasse does not buy the lot if it is included in a land that was a primary forest or other wooded land or old growth forest before 2008.

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

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

- (e) *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.

Biomass from agricultural land may be sourced from a plot that was highly biodiverse forest or other wooded land which is species-rich and not degraded or has been identified as being highly biodiverse by the relevant competent authority in January 2008 and then was deforested and cropped. Means of verification Satellite images before 2008. Nature 2000 viewer <https://natura2000.eea.europa.eu/> Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected as satellite images and Nature 2000 viewer. Duferco Biomasse does not buy the lot if it is included in a land that was a highly biodiverse forest before 2008.

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

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

(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 30(4), unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.

(ii)

Description of a management system process to meet the requirement.

Biomass from agricultural land may be sourced from a plot that was land with a high biodiversity value in January 2008. Public sources must be searched to check 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. Means of verification GRAS database <https://gtplus.gras-system.org/> Nature 2000 viewer <https://natura2000.eea.europa.eu/> Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected using the following open-source tools: GRAS database and Nature 2000 viewer. Duferco Biomasse does not buy the lot if it is sourced from a land that had high biodiversity value, unless evidence can be provided that harvesting was allowed for nature protection purposes (such as restoration of native species cover).

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

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

- (f) *highly biodiverse grassland spanning more than one hectare that is:*
 - (iii) *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*
 - (iv) *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.	Biomass from agricultural land may be sourced from a plot that was: 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) nonnatural, namely grassland that would cease to be grassland in the absence of human intervention and (iii) that is species-rich and not degraded and has been identified as being highly biodiverse by the relevant competent authority. Duferco Biomasse does not source biomass from any grassland, but checkings can be made about previous land use in open-source databases. Means of verification GRAS database https://gtplus.gras-system.org/ Public satellite images before 2008. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected using the following open-source tools: GRAS database and Nature 2000 viewer. Duferco Biomasse does not buy the lot if it is sourced from a previous grassland, unless evidence can be provided that harvesting was allowed to preserve its status as highly biodiverse grassland.
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Article 29 (3e): Protection of land with high biodiversity value

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:(e) heathland – Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).

Description of a management system process to meet the requirement.	Biomass from agricultural land may be sourced from a plot that was heathland in January 2008 and then became wooded area. Usually, Duferco Biomasse does not source from heathlands, but the land use may be changed. Means of verification GRAS database https://gtplus.gras-system.org/ Public satellite images before 2008. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected using the following open-source tools: GRAS database and Nature 2000 viewer. Duferco Biomasse does not buy the lot if it is sourced from a previous heathland.
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Article 29 (4a): Protection of land with high carbon stock

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:

- (d) *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.	Biomass from agricultural land may be sourced from a plot that was peatland in January 2008 and now it has not that status anymore or it was drained in some parts. Means of verification Public satellite images before 2008. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected using the following open-source satellite images. Duferco Biomasse does not buy the lot if it is sourced from a previous peatland, even if only drained in some parts.
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Article 29 (4b): Protection of land with high carbon stock

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:

- (e) *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.	Biomass from agricultural land may be sourced from a plot that was 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 in January 2008. For each lot evidence must be collected about the absence of land use conversion from forested area of any kind to agriculture or other use, even authorized. Means of verification Public satellite images before 2008. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected using the following open-source tools: GRAS database and Nature 2000 viewer. Duferco Biomasse does not buy the lot if it is sourced from a continuously forested area with the definition above, that was converted to agriculture or other use.
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Article 29 (4c): Protection of land with high carbon stock

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:

- (f) *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.	Biomass from agricultural land may be sourced from a plot that was 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 in January 2008. For each lot evidence must be collected about the absence of land use conversion from forested area of any kind to agriculture or other use, even authorized. Means of verification Public satellite images before 2008. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected using the following open-source tools: GRAS database and Nature 2000 viewer. Duferco Biomasse does not buy the lot if it is sourced from a continuously forested area with the definition above, that was converted to agriculture or other use.
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Article 29 (5): Protection of peatland

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was peatland in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.

Description of a management system process to meet the requirement.	Biomass from agricultural land may be sourced from a plot that was peatland in January 2008 and now it is no longer a peatland or was drained in some parts. Means of verification Public satellite images before 2008. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected by analysis of satellite images. The lot is not sourced by Duferco Biomasse if it comes from a peatland, a land that was peatland or a partially drained peatland.
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Country: Italy - Apulia

Article 29 (2): Soil quality and soil carbon

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
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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 law(s) 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 at economic operator level	Soil quality may be slightly affected by salvage operations in some lots, over little slopes, as erosion may be increased locally, where machines left furrows, but then olive orchards are restored and land profile restored as well. Since the crop has been traditional for centuries, it is the best interest for land manager to ensure protection of soil quality. Application of best practises in the agricultural land ensure at least maintenance of HCV, including biodiversity (for instance wildlife protection). Evidence of compliance about these aspects is collected by Duferco Biomasse for each lot. Means of verification - Traditional land management - Surveys of Re-planting operations Risk assessment Low risk
(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	No, management plan needed at economic operator level (go to step 4)

the identified law(s)?	
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	When roots are removed, there might be some loss of soil carbon, but new olive trees are replanted as part of standard activities, usually in even higher density than before (as new standard procedures in cropping are followed), meaning that soil carbon loss is only temporary. Risk assessment Low risk

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

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

- (g) *primary forest and other wooded land and old growth forest, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located.*

Description of a management system process to meet the requirement.	Not applicable to olive trees orchards.
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Article 29 (3b): Protection of land with high biodiversity value

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

- (h) *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.	Not applicable to olive trees orchards.
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Article 29 (3c): Protection of land with high biodiversity value

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

- (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 30(4), unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.*
 - (iii)

Description of a management system process to meet the requirement.	Not applicable to olive trees orchards.
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Article 29 (3d): Protection of land with high biodiversity value

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

- (i) *highly biodiverse grassland spanning more than one hectare that is:*
 - (v) *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*
 - (vi) *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.	Not applicable to olive trees orchards.
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Article 29 (3e): Protection of land with high biodiversity value

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:(e) *heathland – Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).*

Description of a management system process to meet the requirement.	Not applicable to olive trees orchards.
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Article 29 (4a): Protection of land with high carbon stock

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:

- (g) *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.	Not applicable to olive trees orchards.
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Article 29 (4b): Protection of land with high carbon stock

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:

- (h) *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.	Not applicable to olive trees orchards.
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Article 29 (4c): Protection of land with high carbon stock

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:

- (i) *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.	Not applicable to olive trees orchards.
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Article 29 (5): Protection of peatland

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was peatland in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.

Description of a management system process to meet the requirement.	Not applicable to olive trees orchards.
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Country: Italy - Lazio

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 law(s) 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 at economic operator level	Duferco Biomasse collects biomass in Lazio coming from agricultural land (such as branches of pruned trees, end of life fruit trees) and from urban and landscape (hedges, gardens, etc.). In case of pruning there is no impact on soil quality . In case of Short Rotation Coppice there is no impact on soil quality, as only stems are cut. In case or eradication of trees, such as fruit trees or end of cycle SRC, the plots will be cultivated again and soil quality maintained to provide support to the next crop. Evidence about impacts on soil quality are collected for each lot of agricultural TOF in a document that is a checklist of indicators that are applicable (Section 2 of Instruction Document 1A). About urban and landscape TOF this indicator is not applicable. Risk assessment Low risk About urban and landscape TOF this indicator is not applicable.
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(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	When agricultural trees are pruned or stems are cut, some soil carbon is lost, but the loss is then compensated by fertilizers. Spread of fertilizers of any kind is strictly regulated by laws in Italy, descending from EU Regulations. Farmers must be trained and licenced and each spreading within the year must be input in a proper register. When roots are removed, there might be some loss of soil carbon, but new plants cover the lacking spots as part of standard activities, usually in even higher density then before (as new standard procedures in cropping are followed), meaning that soil carbon loss is only temporary. Risk assessment Low risk

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

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

- (j) primary forest and other wooded land and old growth forest, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located.*

Description of a management system process to meet the requirement.

Biomass from agricultural land may be sourced from a plot that was primary forest or other wooded land or old growth forest in January 2008 and then was deforested and cropped. Primary forests in Europe are collected in a database that can be searched. Means of verification <https://onlinelibrary.wiley.com/doi/full/10.1111/ddi.12778> Public satellite images before 2008 and after, collected in a check document. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected (satellite images and maps of primary forests). Duferco Biomasse does not buy the lot if it is included in a land that was a primary forest or other wooded land or old growth forest before 2008.

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

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

- (k) 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.

Biomass from agricultural land may be sourced from a plot that was highly biodiverse forest or other wooded land which is species-rich and not degraded or has been identified as being highly biodiverse by the relevant competent authority in January 2008 and then was deforested and cropped. Means of verification Satellite images before 2008. Nature 2000 viewer <https://natura2000.eea.europa.eu/> Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected as satellite images and Nature 2000 viewer. Duferco Biomasse does not buy the lot if it is included in a land that was a highly biodiverse forest before 2008.

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

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

(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 30(4), unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.*

(iv)

Description of a management system process to meet the requirement.	Biomass from agricultural land may be sourced from a plot that was land with a high biodiversity value in January 2008. Public sources must be searched to check 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. Means of verification GRAS database https://gtplus.gras-system.org/ Nature 2000 viewer https://natura2000.eea.europa.eu/ Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected using the following open-source tools: GRAS database and Nature 2000 viewer. Duferco Biomasse does not buy the lot if it is sourced from a land that had high biodiversity value, unless evidence can be provided that harvesting was allowed for nature protection purposes (such as restoration of native species cover).
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Article 29 (3d): Protection of land with high biodiversity value

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

- (i) *highly biodiverse grassland spanning more than one hectare that is:*
 - (vii) *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*
 - (viii) *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.	Biomass from agricultural land may be sourced from a plot that was: 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) nonnatural, namely grassland that would cease to be grassland in the absence of human intervention and (iii) that is species-rich and not degraded and has been identified as being highly biodiverse by the relevant competent authority. Duferco Biomasse does not source biomass from any grassland, but checkings can be made about previous land use in open-source databases. Means of verification GRAS database https://gtplus.gras-system.org/ Public satellite images before 2008. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected using the following open-source tools: GRAS database and Nature 2000 viewer. Duferco Biomasse does not buy the lot if it is sourced from a previous grassland, unless evidence can be provided that harvesting was allowed to preserve its status as highly biodiverse grassland.
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Article 29 (3e): Protection of land with high biodiversity value

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:(e) heathland – Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).

Description of a management system process to meet the requirement.	Biomass from agricultural land may be sourced from a plot that was heathland in January 2008 and then became wooded area. Usually, Duferco Biomasse does not source from heathlands, but the land use may be changed. Means of verification GRAS database https://gtplus.gras-system.org/ Public satellite images before 2008. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected using the following open-source tools: GRAS database and Nature 2000 viewer. Duferco Biomasse does not buy the lot if it is sourced from a previous heathland.
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Article 29 (4a): Protection of land with high carbon stock

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:

- (j) *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.	Biomass from agricultural land may be sourced from a plot that was peatland in January 2008 and now it has not that status anymore or it was drained in some parts. Means of verification Public satellite images before 2008. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected using the following open-source satellite images. Duferco Biomasse does not buy the lot if it is sourced from a previous peatland, even if only drained in some parts.
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Article 29 (4b): Protection of land with high carbon stock

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:

- (k) *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.	Biomass from agricultural land may be sourced from a plot that was 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 in January 2008. For each lot evidence must be collected about the absence of land use conversion from forested area of any kind to agriculture or other use, even authorized. Means of verification Public satellite images before 2008. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected using the following open-source tools: GRAS database and Nature 2000 viewer. Duferco Biomasse does not buy the lot if it is sourced from a continuously forested area with the definition above, that was converted to agriculture or other use.
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Article 29 (4c): Protection of land with high carbon stock

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:

- (l) *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.	Biomass from agricultural land may be sourced from a plot that was land with high-carbon stock (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 the conditions laid down in paragraph 10 of this Article would be fulfilled). For each lot evidence must be collected about the absence of land use change of land with high-carbon stock, even authorized. Means of verification Public satellite images before 2008. Risk assessment Specified risk Mitigation Measures The lot is not sourced by Duferco Biomasse if it comes from a land with high-carbon stock that has changed its status to low-carbon stock.
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Article 29 (5): Protection of peatland

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was peatland in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.

Description of a management system process to meet the requirement.	Biomass from agricultural land may be sourced from a plot that was peatland in January 2008 and now it is no longer a peatland or was drained in some parts. Means of verification Public satellite images before 2008. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected by analysis of satellite images. The lot is not sourced by Duferco Biomasse if it comes from a peatland, a land that was peatland or a partially drained peatland.
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Country: Italy - Emilia-Romagna

Article 29 (2): Soil quality and soil carbon

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
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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 law(s) 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 at economic operator level	Duferco Biomasse collects biomass in Emilia-Romagna coming from agricultural land (such as branches of pruned trees, end of life fruit trees) and from urban and landscape (hedges, gardens, etc.). In case of pruning there is no impact on soil quality . In case of Short Rotation Coppice there is no impact on soil quality, as only stems are cut. In case of eradication of trees, such as fruit trees or end of cycle SRC, the plots will be cultivated again and soil quality maintained to provide support to the next crop. Evidence about impacts on soil quality are collected for each lot of agricultural TOF in a document that is a checklist of indicators that are applicable (Section 2 of Instruction Document 1A). About urban and landscape TOF this indicator is not applicable. Risk assessment Low risk About urban and landscape TOF this indicator is not applicable.
(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	When agricultural trees are pruned or stems are cut, some soil carbon is lost, but the loss is then compensated by fertilizers. Spread of fertilizers of any kind is strictly regulated by laws in Italy, descending from EU Regulations. Farmers must be trained and licenced and each spreading within the year must be input in a proper register. When roots are removed, there might be some loss of soil carbon, but new plants cover the lacking spots as part of standard activities, usually in even higher density then before (as new standard procedures in cropping are followed), meaning that soil carbon loss is only temporary. Risk assessment Low risk

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

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

- (m) *primary forest and other wooded land and old growth forest, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located.*

Description of a management system process to meet the requirement.	Biomass from agricultural land may be sourced from a plot that was primary forest or other wooded land or old growth forest in January 2008 and then was deforested and cropped. Primary forests in Europe are collected in a database that can be searched. Means of verification https://onlinelibrary.wiley.com/doi/full/10.1111/ddi.12778 Public satellite images before 2008 and after, collected in a check document. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected (satellite images and maps of primary forests). Duferco Biomasse does not buy the lot if it is included in a land that was a primary forest or other wooded land or old growth forest before 2008.
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Article 29 (3b): Protection of land with high biodiversity value

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

- (n) *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.

Biomass from agricultural land may be sourced from a plot that was highly biodiverse forest or other wooded land which is species-rich and not degraded or has been identified as being highly biodiverse by the relevant competent authority in January 2008 and then was deforested and cropped. Means of verification Satellite images before 2008. Nature 2000 viewer <https://natura2000.eea.europa.eu/> Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected as satellite images and Nature 2000 viewer. Duferco Biomasse does not buy the lot if it is included in a land that was a highly biodiverse forest before 2008.

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

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

- (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 30(4), unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.*

- (v)

Description of a management system process to meet the requirement.

Biomass from agricultural land may be sourced from a plot that was land with a high biodiversity value in January 2008. Public sources must be searched to check 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. Means of verification GRAS database <https://gtplus.gras-system.org/> Nature 2000 viewer <https://natura2000.eea.europa.eu/> Risk assessment Specified risk Mitigation Measures

	For each lot, evidence is collected using the following open-source tools: GRAS database and Nature 2000 viewer. Duferco Biomasse does not buy the lot if it is sourced from a land that had high biodiversity value, unless evidence can be provided that harvesting was allowed for nature protection purposes (such as restoration of native species cover).
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Article 29 (3d): Protection of land with high biodiversity value

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

- (o) *highly biodiverse grassland spanning more than one hectare that is:*
 - (ix) *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*
 - (x) *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.	Biomass from agricultural land may be sourced from a plot that was: 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) nonnatural, namely grassland that would cease to be grassland in the absence of human intervention and (iii) that is species-rich and not degraded and has been identified as being highly biodiverse by the relevant competent authority. Duferco Biomasse does not source biomass from any grassland, but checkings can be made about previous land use in open-source databases. Means of verification GRAS database https://gtplus.gras-system.org/ Public satellite images before 2008. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected using the following open-source tools: GRAS database and Nature 2000 viewer. Duferco Biomasse does not buy the lot if it is sourced from a previous grassland, unless evidence can be provided that harvesting was allowed to preserve its status as highly biodiverse grassland.
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Article 29 (3e): Protection of land with high biodiversity value

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status: (e) heathland – Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).

Description of a management system process to meet the requirement.	Biomass from agricultural land may be sourced from a plot that was heathland in January 2008 and then became wooded area. Usually, Duferco Biomasse does not source from heathlands, but the land use may be changed. Means of verification GRAS database https://gtplus.gras-system.org/ Public satellite images before 2008. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected using the following open-source tools: GRAS database and Nature 2000 viewer. Duferco Biomasse does not buy the lot if it is sourced from a previous heathland.
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Article 29 (4a): Protection of land with high carbon stock

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:

(m) 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.	Biomass from agricultural land may be sourced from a plot that was peatland in January 2008 and now it has not that status anymore or it was drained in some parts. Means of verification Public satellite images before 2008. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected using the following open-source satellite images. Duferco Biomasse does not buy the lot if it is sourced from a previous peatland, even if only drained in some parts.
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Article 29 (4b): Protection of land with high carbon stock

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:

(n) 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	Biomass from agricultural land may be sourced from a plot that was continuously forested areas, namely land spanning more than one hectare with trees higher than five metres and a canopy
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process to meet the requirement.	cover of more than 30 %, or trees able to reach those thresholds in situ in January 2008. For each lot evidence must be collected about the absence of land use conversion from forested area of any kind to agriculture or other use, even authorized. Means of verification Public satellite images before 2008. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected using the following open-source tools: GRAS database and Nature 2000 viewer. Duferco Biomasse does not buy the lot if it is sourced from a continuously forested area with the definition above, that was converted to agriculture or other use.
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Article 29 (4c): Protection of land with high carbon stock

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:

- (o) *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.	Biomass from agricultural land may be sourced from a plot that was 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 in January 2008. For each lot evidence must be collected about the absence of land use conversion from forested area of any kind to agriculture or other use, even authorized. Means of verification Public satellite images before 2008. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected using the following open-source tools: GRAS database and Nature 2000 viewer. Duferco Biomasse does not buy the lot if it is sourced from a continuously forested area with the definition above, that was converted to agriculture or other use.
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Article 29 (5): Protection of peatland

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was peatland in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.

Description of a management system process to meet the requirement.	Biomass from agricultural land may be sourced from a plot that was peatland in January 2008 and now it is no longer a peatland or was drained in some parts. Means of verification Public satellite images before 2008. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected by analysis of satellite images. The lot is not sourced by Duferco Biomasse if it comes from a peatland, a land that was peatland or a partially drained peatland.
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Country: Italy - Lombardy

Article 29 (2): Soil quality and soil carbon

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 law(s) 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 at economic operator level	Duferco Biomasse collects biomass in Lombardy coming from agricultural land (such as branches of pruned trees, end of life fruit trees) and from urban and landscape (hedges, gardens, etc.). In case of pruning there is no impact on soil quality. In case of Short Rotation Coppice there is no impact on soil quality, as only stems are cut. In case of eradication of trees, such as fruit trees or end of cycle SRC, the plots will be cultivated again and soil quality maintained to provide support to the next crop. Evidence about impacts on soil quality are collected for each lot of agricultural TOF in a document that is a checklist of indicators that are applicable (Section 2 of Instruction Document 1A). About urban and landscape TOF this indicator is not applicable. Risk assessment Low risk About urban and landscape TOF this indicator is not applicable.
(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	When agricultural trees are pruned or stems are cut, some soil carbon is lost, but the loss is then compensated by fertilizers. Spread of fertilizers of any kind is strictly regulated by laws in Italy, descending from EU Regulations. Farmers must be trained and licenced and each spreading within the year must be input in a proper register. When roots are removed, there might be some loss of soil carbon, but new plants cover the lacking spots as part of standard activities, usually in

at economic operator level	even higher density than before (as new standard procedures in cropping are followed), meaning that soil carbon loss is only temporary. Risk assessment Low risk
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Article 29 (3a): Protection of land with high biodiversity value

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

- (p) *primary forest and other wooded land and old growth forest, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located.*

Description of a management system process to meet the requirement.	Biomass from agricultural land may be sourced from a plot that was primary forest or other wooded land or old growth forest in January 2008 and then was deforested and cropped. Primary forests in Europe are collected in a database that can be searched. Means of verification https://onlinelibrary.wiley.com/doi/full/10.1111/ddi.12778 Public satellite images before 2008 and after, collected in a check document. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected (satellite images and maps of primary forests). Duferco Biomasse does not buy the lot if it is included in a land that was a primary forest or other wooded land or old growth forest before 2008.
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Article 29 (3b): Protection of land with high biodiversity value

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

- (q) *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.	Biomass from agricultural land may be sourced from a plot that was highly biodiverse forest or other wooded land which is species-rich and not degraded or has been identified as being highly biodiverse by the relevant competent authority in January 2008 and then was deforested and cropped. Means of verification Satellite images before 2008. Nature 2000 viewer https://natura2000.eea.europa.eu/ Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected as satellite images and Nature 2000 viewer. Duferco Biomasse does not buy the lot if it is included in a land that was a highly biodiverse forest before 2008.
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Article 29 (3c): Protection of land with high biodiversity value

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

(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 30(4), unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.*

(vi)

Description of a management system process to meet the requirement.

Biomass from agricultural land may be sourced from a plot that was highly biodiverse forest or other wooded land which is species-rich and not degraded or has been identified as being highly biodiverse by the relevant competent authority in January 2008 and then was deforested and cropped. Means of verification Satellite images before 2008. Nature 2000 viewer <https://natura2000.eea.europa.eu/> Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected as satellite images and Nature 2000 viewer. Duferco Biomasse does not buy the lot if it is included in a land that was a highly biodiverse forest before 2008.

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

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

- (r) *highly biodiverse grassland spanning more than one hectare that is:*
 - (xi) *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*
 - (xii) *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.	Biomass from agricultural land may be sourced from a plot that was: 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) nonnatural, namely grassland that would cease to be grassland in the absence of human intervention and (iii) that is species-rich and not degraded and has been identified as being highly biodiverse by the relevant competent authority. Duferco Biomasse does not source biomass from any grassland, but checkings can be made about previous land use in open-source databases. Means of verification GRAS database https://gtplus.gras-system.org/ Public satellite images before 2008. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected using the following open-source tools: GRAS database and Nature 2000 viewer. Duferco Biomasse does not buy the lot if it is sourced from a previous grassland, unless evidence can be provided that harvesting was allowed to preserve its status as highly biodiverse grassland.
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Article 29 (3e): Protection of land with high biodiversity value

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:(e) *heathland – Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).*

Description of a management system process to meet the requirement.	Biomass from agricultural land may be sourced from a plot that was heathland in January 2008 and then became wooded area. Usually, Duferco Biomasse does not source from heathlands, but the land use may be changed. Means of verification GRAS database https://gtplus.gras-system.org/ Public satellite images before 2008. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected using the following open-source tools: GRAS database and Nature 2000 viewer. Duferco Biomasse does not buy the lot if it is sourced from a previous heathland.
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Article 29 (4a): Protection of land with high carbon stock

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:

- (p) *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.	Biomass from agricultural land may be sourced from a plot that was peatland in January 2008 and now it has not that status anymore or it was drained in some parts. Means of verification Public satellite images before 2008. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected using the following open-source satellite images. Duferco Biomasse does not buy the lot if it is sourced from a previous peatland, even if only drained in some parts.
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Article 29 (4b): Protection of land with high carbon stock

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:

- (q) *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.	Biomass from agricultural land may be sourced from a plot that was 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 in January 2008. For each lot evidence must be collected about the absence of land use conversion from forested area of any kind to agriculture or other use, even authorized. Means of verification Public satellite images before 2008. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected using the following open-source tools: GRAS database and Nature 2000 viewer. Duferco Biomasse does not buy the lot if it is sourced from a continuously forested area with the definition above, that was converted to agriculture or other use.
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Article 29 (4c): Protection of land with high carbon stock

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:

- (r) *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.	Biomass from agricultural land may be sourced from a plot that was 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 in January 2008. For each lot evidence must be collected about the absence of land use conversion from forested area of any kind to agriculture or other use, even authorized. Means of verification Public satellite images before 2008. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected using the following open-source tools: GRAS database and Nature 2000 viewer. Duferco Biomasse does not buy the lot if it is sourced from a continuously forested area with the definition above, that was converted to agriculture or other use.
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Article 29 (5): Protection of peatland

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was peatland in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.

Description of a management system process to meet the requirement.	Biomass from agricultural land may be sourced from a plot that was peatland in January 2008 and now it is no longer a peatland or was drained in some parts. Means of verification Public satellite images before 2008. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected by analysis of satellite images. The lot is not sourced by Duferco Biomasse if it comes from a peatland, a land that was peatland or a partially drained peatland.
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Country: Italy - Veneto

Article 29 (2): Soil quality and soil carbon

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
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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 law(s) 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 at economic operator level	Duferco Biomasse collects biomass in Veneto coming from agricultural land (such as branches of pruned trees, end of life fruit trees) and from urban and landscape (hedges, gardens, etc.). In case of pruning there is no impact on soil quality . In case of Short Rotation Coppice there is no impact on soil quality, as only stems are cut. In case of eradication of trees, such as fruit trees or end of cycle SRC, the plots will be cultivated again and soil quality maintained to provide support to the next crop. Evidence about impacts on soil quality are collected for each lot of agricultural TOF in a document that is a checklist of indicators that are applicable (Section 2 of Instruction Document 1A). About urban and landscape TOF this indicator is not applicable. Risk assessment Low risk About urban and landscape TOF this indicator is not applicable.
(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	When agricultural trees are pruned or stems are cut, some soil carbon is lost, but the loss is then compensated by fertilizers. Spread of fertilizers of any kind is strictly regulated by laws in Italy, descending from EU Regulations. Farmers must be trained and licenced and each spreading within the year must be input in a proper register. When roots are removed, there might be some loss of soil carbon, but new plants cover the lacking spots as part of standard activities, usually in even higher density then before (as new standard procedures in cropping are followed), meaning that soil carbon loss is only temporary. Risk assessment Low risk

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

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

- (s) *primary forest and other wooded land and old growth forest, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located.*

Description of a management system process to meet the requirement.	Biomass from agricultural land may be sourced from a plot that was primary forest or other wooded land or old growth forest in January 2008 and then was deforested and cropped. Primary forests in Europe are collected in a database that can be searched. Means of verification https://onlinelibrary.wiley.com/doi/full/10.1111/ddi.12778 Public satellite images before 2008 and after, collected in a check document. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected (satellite images and maps of primary forests). Duferco Biomasse does not buy the lot if it is included in a land that was a primary forest or other wooded land or old growth forest before 2008.
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Article 29 (3b): Protection of land with high biodiversity value

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

- (t) *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.

Biomass from agricultural land may be sourced from a plot that was highly biodiverse forest or other wooded land which is species-rich and not degraded or has been identified as being highly biodiverse by the relevant competent authority in January 2008 and then was deforested and cropped. Means of verification Satellite images before 2008. Nature 2000 viewer <https://natura2000.eea.europa.eu/> Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected as satellite images and Nature 2000 viewer. Duferco Biomasse does not buy the lot if it is included in a land that was a highly biodiverse forest before 2008.

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

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

- (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 30(4), unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.*

- (vii)

Description of a management system process to meet the requirement.

Biomass from agricultural land may be sourced from a plot that was highly biodiverse forest or other wooded land which is species-rich and not degraded or has been identified as being highly biodiverse by the relevant competent authority in January 2008 and then was deforested and cropped. Means of verification Satellite images before 2008. Nature 2000 viewer <https://natura2000.eea.europa.eu/> Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected as satellite images and Nature 2000 viewer. Duferco Biomasse does not buy the lot if it is included in a land that was a highly

	biodiverse forest before 2008.
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Article 29 (3d): Protection of land with high biodiversity value

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

(u) *highly biodiverse grassland spanning more than one hectare that is:*

- (xiii) *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*
- (xiv) *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.

Biomass from agricultural land may be sourced from a plot that was: 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) nonnatural, namely grassland that would cease to be grassland in the absence of human intervention and (iii) that is species-rich and not degraded and has been identified as being highly biodiverse by the relevant competent authority. Duferco Biomasse does not source biomass from any grassland, but checkings can be made about previous land use in open-source databases. Means of verification GRAS database <https://gtplus.gras-system.org/> Public satellite images before 2008. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected using the following open-source tools: GRAS database and Nature 2000 viewer. Duferco Biomasse does not buy the lot if it is sourced from a previous grassland, unless evidence can be provided that harvesting was allowed to preserve its status as highly biodiverse grassland.

Article 29 (2a): Protection of land with high biodiversity value

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status: (e) heathland – Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).

Description of a management system process to meet the requirement.	Biomass from agricultural land may be sourced from a plot that was heathland in January 2008 and then became wooded area. Usually, Duferco Biomasse does not source from heathlands, but the land use may be changed. Means of verification GRAS database https://gtplus.gras-system.org/ Public satellite images before 2008. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected using the following open-source tools: GRAS database and Nature 2000 viewer. Duferco Biomasse does not buy the lot if it is sourced from a previous heathland.
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Article 29 (4a): Protection of land with high carbon stock

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:

- (s) *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.	Biomass from agricultural land may be sourced from a plot that was peatland in January 2008 and now it has not that status anymore or it was drained in some parts. Means of verification Public satellite images before 2008. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected using the following open-source satellite images. Duferco Biomasse does not buy the lot if it is sourced from a previous peatland, even if only drained in some parts.
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Article 29 (4b): Protection of land with high carbon stock

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:

- (t) *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.	Biomass from agricultural land may be sourced from a plot that was 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 in January 2008. For each lot evidence must be collected about the absence of land use conversion from forested area of any kind to agriculture or other use, even authorized. Means of verification Public satellite images
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	before 2008. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected using the following open-source tools: GRAS database and Nature 2000 viewer. Duferco Biomasse does not buy the lot if it is sourced from a continuously forested area with the definition above, that was converted to agriculture or other use.
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Article 29 (4c): Protection of land with high carbon stock

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:

- (u) *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.	Biomass from agricultural land may be sourced from a plot that was 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 in January 2008. For each lot evidence must be collected about the absence of land use conversion from forested area of any kind to agriculture or other use, even authorized. Means of verification Public satellite images before 2008. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected using the following open-source tools: GRAS database and Nature 2000 viewer. Duferco Biomasse does not buy the lot if it is sourced from a continuously forested area with the definition above, that was converted to agriculture or other use.
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Article 29 (5): Protection of peatland

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was peatland in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.

Description of a management system process to meet the requirement.	Biomass from agricultural land may be sourced from a plot that was peatland in January 2008 and now it is no longer a peatland or was drained in some parts. Means of verification Public satellite images before 2008. Risk assessment Specified risk Mitigation Measures For each lot, evidence is collected by analysis of satellite images. The lot is not sourced by Duferco Biomasse if it comes from a peatland, a land that was peatland or a partially drained peatland.
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Annex 4a: RED II detailed findings for Trees Outside Forest (TOF) feedstock

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