



Supply Base Report: Biosilva Agroforestal S.L.

Third Surveillance Audit

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Completed in accordance with the Supply Base Report Template Version 1.4

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: Biosilva Agroforestal S.L.

Producer address: Calle Oro 55 28770 Colmenar Viejo, Madrid, Spain

SBP Certificate Code: SBP-07-03

Geographic position: 40.350300, -3.679500

Primary contact: David Holgado, +34 917 888 780,dholgado@biosilva.com

Company website: N/A

Date report finalised: 18 Aug 2020

Close of last CB audit: 20 Oct 2021

Name of CB: NEPCon OÜ

SBP Standard(s) used: SBP Standard 1: Feedstock Compliance Standard, SBP Standard 2: Verification of SBP-compliant Feedstock, SBP Standard 4: Chain of Custody, SBP Standard 5: Collection and Communication of Data Instruction

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

SBP Endorsed Regional Risk Assessment: Not applicable

Weblink to SBR on Company website: N/A

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

2 Description of the Supply Base

2.1 General description

Feedstock types: Primary

Includes Supply Base evaluation (SBE): Yes

Feedstock origin (countries): Spain

2.2 Description of countries included in the Supply Base

Country: Spain

Area/Region: Autonomous Communities of Andalusia, Region of Murcia, Valencian Community, Castilla La Mancha (provinces of Cuenca and Albacete mainly), Galicia, Asturias, Cantabria and Basque Country.

Exclusions: Yes

Below is the statistical data available from the Autonomous Communities included in the scope (IFN3 or/and IF4, statistical data from the Ministry of the Government of Spain Forestry Statistical Yearbook 2016).

Andalusia:

- Andalusia has 2,923,000 hectares of wooded forest land, out of a total 4,467,000 hectares of forest land.
- Private forests clearly predominate, representing 73.4% of the surface area, while public forests represent 26.6% of the surface area. The public area is divided almost in half between the area belonging to the Government of Andalusia or the State and the Local Authorities.
- According to data from the Forestry Statistical Yearbook 2016 the average stock of the Andalusian forests is 75,000,000 m³ of timber volume with bark (NFI 3). In 2016 45,018 m³ of wood with bark were felled in the community.

Valencian Community:

- The Valencian Community has 748,000 hectares of wooded forest land, out of a total of 1,267,000 hectares of forest land.
- Predominantly private forest except in the province of Valencia where public forest is more predominant. In the Valencian Community 55.2% of forest land belongs to private individuals, 38.6% is publicly owned and the ownership of 6.2% is unknown. Public ownership is shared mainly between the councils, which own three quarters of the public forest land (76%), with a smaller proportion being held by the Generalitat (15.4%) and other local authorities (8.5%).

- According to data from the Forestry Statistical Yearbook 2016 the average stock of the Valencian forests is 20,000,000 m3 of timber volume with bark (NFI 3). In 2016 19,506 m3 of wood with bark were felled in the community.

Region of Murcia:

- The Region of Murcia has 308,000 hectares of wooded forest land, out of a total of 511,000 hectares of forest land.
- Private forest land is clearly predominant and accounts for 70% of Murcia's forest area. Of the 30% of public forest, 60% belongs to local authorities and 40% to the regional or central administration.
- According to data from the Forestry Statistical Yearbook 2016 the average stock of Murcia's forests is 9,000,000 m3 of timber volume with bark (NFI 4). In 2016 no wood with bark was felled in the community.

Castilla La Mancha:

- Castilla La Mancha has 2,708,000 hectares of wooded forest land, out of a total of 3,598,000 hectares of forest land
- Private forest ownership is clearly predominant and represents 76% of the total forest area in the community. Of the 24% of public forest, 55% belongs to local authorities and 45% belongs to the regional or central administration
- According to data from the Forestry Statistical Yearbook 2016 the average stock of forests of Castilla La Mancha is 84,000,000 m3 of timber volume with bark (NFI 3). In 2016 776,804 m3 of wood with bark were felled in the community

The next Autonomous Communities are formally under the scope of the certificate, and risk designation and mitigation measures have been defined, but Organization has not operate yet in their territories.

Galicia:

- Galicia has 1,454,000 hectares of wooded forest land, out of a total of 2,041,000 hectares of forest land
- Private forest ownership is overwhelmingly predominant, representing 98% of the forest area, which, as well as forest micro-ownership (smallholdings) typical of Galician properties (1,385,550 hectares of private ownership, the vast majority of which are smallholdings, 69% of the private forest land) also includes the forest area owned under the Communal System (608,646 hectares, 31% of private forest land), both Germanic (municipal communal forest land – MVMC) and Roman (abertales, fabeo(jointly owned) and others...). 2% of the forest land is publicly owned
- According to data from the Forestry Statistical Yearbook 2016 the average stock of the Galician forests is 193,000,000 m3 of timber volume with bark (NFI 4). In 2016 8,644,726 m3 of wood with bark were felled in the community

Asturias:

- Asturias has 454,000 hectares of wooded forest land, out of a total of 770,000 hectares of forest land.
- Private ownership is predominant, representing 55% of the surface area (421,500 hectares), mainly smallholdings (412,985 hectares), with an average surface area of 0.6 hectares, as well as forest area owned under the Communal System (8,471 hectares, municipal communal forest land - MVMC). Publicly owned forest land represents 45% of the surface area (343,000 hectares), the majority of which belongs to local authorities: Councils, Rural Parishes...
- According to data from the Forestry Statistical Yearbook 2016 the average stock of the Asturian forests is 61,000,000 m³ of timber volume with bark (NFI 4). In 2016 1,146,927 m³ of wood with bark were felled in the community

Cantabria:

- Cantabria has 211,000 hectares of wooded forest land, out of a total of 364,000 hectares of forest land.
- Publicly owned forests are clearly predominant, representing 72% of the surface area (257,655 hectares), practically all of which is owned by local authorities. Privately owned forest land represents the remaining 28% of the surface area (101,800 hectares) where, although there are some large private estates, the average size of privately owned forest land is hardly more than two hectares.
- According to data from the Forestry Statistical Yearbook 2016 the average stock of the Cantabrian forests is 27,500,000 m³ of timber volume with bark (NFI 4). In 2016 529,533 m³ of wood with bark were felled in the community

Euskadi:

- Euskadi has 397,000 hectares of wooded forest land, out of a total of 492,000 hectares of forest land.
- Private forest ownership is predominant, representing 54% of the surface area (268,580 hectares). Half of the holdings with forest land hectares in the Basque Country are found in Bizkaia and only 11% in Álava, but the latter account for 42% of the forest area. This is due to the high total and average area of public, communal and municipal forests in this region. In Gipuzkoa and Bizkaia the most common forest holdings (in both cases 29%) are those of between 2 and 5 hectares. In contrast, in both regions the number of holdings with a considerable forest area, or more than 100 hectares, is less than 1% of the total number of forest holdings. In Araba the situation is quite different. The most common holdings are those of between 0.1 and 1 hectare (23% of the total) and the larger ones of over 100 hectares make up 11% of the total. Public forests make up 46% of the forest land (226,474 hectares), which mainly belongs to local authorities, a large proportion of which are in Álava.

- According to data from the Forestry Statistical Yearbook 2016 the average stock of the Basque forests is 62,500,000 m3 of timber volume with bark (NFI 4). In 2016 1,644,634 m3 of wood with bark were felled in the community

With regards the scope, the Supply Base in Galicia, Asturias, Cantabria and Basque Country involves the inclusion of areas of high management intensity and a significant increase in the area of forest plantations, of different species of conifers as well as eucalyptus. Pine species in Euskadi are excluded from the scope. In the Communities of the Cantabrian Cornice, especially in the Basque Country, there are other species of plantation conifers, as well as pines.

There may also be holm oak and cork oak occasionally, in the Mediterranean area, as well as other species of broadleaf trees, in the Atlantic area, as a result of their appearance in the areas of forestry works or harvesting, as well as feedstock from fruit trees (in Murcia in particular) olive trees and almond trees. The estimated volume of these species different from the main ones is estimated to be 5% of the total.

In terms of the defined area of supply (Supply Base) the genus *Pinus* appears, in various species, in all the extended Autonomous Communities, while the genus *Eucalyptus*, also in various species, appears in Andalusia, Galicia, Asturias, Cantabria and Euskadi. In turn, other species of plantation conifers appear in Galicia, Asturias, Cantabria and, especially, in the Basque Country.

With regards the works carried out to produce the feedstock, the relevant update is that in both Galicia and Cantabria felling notifications/communications are used normally.

In the case of public forests managed by the administration (public property) internal approval must be obtained from the Forestry Service of the Autonomous Community or from the Province Councils in the case of the Basque Country.

Biosilva Agroforestal has two Chain of Custody certificates: FSC (SGSCH-CoC/CW-060363) and PEFC (ES19/85349) active since 2016, as well as ISO 9001:2015, ISO 14001:2015 and OHSAS 18001:2007 certifications. Due to the nature of the work carried out by Biosilva Agroforestal: forestry work and harvesting, chipping and selling chips, or buying chips to sell, the supply chain is non-existent or very short (1 supplier that carries out the work and sells the chips to Biosilva Agroforestal).

The ports of origin act as collection points for the chips which are then loaded onto ships and exported. Biosilva Agroforestal currently has the following active collection points, the majority of which are ports:

Valencian Community:

- CASTELLÓN
- SAGUNTO
- ALICANTE
- VALENCIA

Region of Murcia:

- CARTAGENA

Andalusia:

- HUELVA
- CADIZ
- ALMERIA
- SEVILLE
- MOTRIL
- MALAGA
- ALGECIRAS
- CARBONERAS

2.3 Actions taken to promote certification amongst feedstock supplier

During 2021 Biosilva maintained active both FSC and PEFC CoC certificates. In this year most of forest works origin of the chips included in SBP Supply Base were made directly by Biosilva.

2.4 Quantification of the Supply Base

Supply Base

- Total Supply Base area (million ha):** 13,36
- Tenure by type (million ha):** 9.95 (Privately owned), 3.41 (Public)
- Forest by type (million ha):** 13.36 (Temperate)
- Forest by management type (million ha):** 1.04 (Plantation), 8.20 (Managed natural)
- Certified forest by scheme (million ha):** 0.42 (FSC), 0.66 (PEFC)

Describe the harvesting type which best describes how your material is sourced: Thinning

Explanation: Feedstock comes, during 2021, from Pine stands from Almería Province (Andalusia), Region of Murcia, Valencian Community and Albacete (Castilla la Mancha), all in southeast Spain. Usually are pine stands coming from reforestations which have relevant deficit in forest management and the valorisation of chips for biomass industry becomes a good way to improve forest stands maintenance. Stands and works done matches clearly with thinning specifications. So, harvesting types are thinning or forest works to improve stands. There have also been clearings and a preparation fellings in more developed stands. No clearcuts. Biosilva Agroforestal still does not work in the north of Spain, where the intensity of management is high and there is a significant variety of plantation species and harvesting turnovers. Regarding machinery used in the harvest and chipped of biomass is: - Chipper Doppstadt. - Self-loading truck Valmet and Timberjack. - Chainsaws. Teamwork with 4 chainsaws for each self-loading truck. Wood is stacked in the forest and stay there 2-3 months to get dry. Later on, is chipped in the forest, moved to port and unloading

Was the forest in the Supply Base managed for a purpose other than for energy markets? Yes - Majority

Explanation: There is no relevant economic drives and wood industry behind most of pine stands in South east Spain. So, valorisation of chips for biomass industry becomes a good way to improve forest stands maintenance. These zones where mainly reforested during 20th century regarding to rural exodus, erosion control, river basin protection, public investments... Nowadays, these stands play an important role in river basin protection, erosion and desertification control in the context of climate change.

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

Explanation: Most of these stands are reforestations and have not been regenerated yet. In any case, regarding Spanish forest law, no change of use allowed and forest stands need to be regenerated, mostly by natural means.

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: In some cases, chips comes from forest works related to damage due to snowfall or other storms

Feedstock

Reporting period from: 07 Jul 2020

Reporting period to: 15 Sep 2021

- a. **Total volume of Feedstock:** 1-200,000 tonnes
- b. **Volume of primary feedstock:** 1-200,000 tonnes
- c. **List percentage of primary feedstock, by the following categories.**
 - Certified to an SBP-approved Forest Management Scheme: 0%
 - Not certified to an SBP-approved Forest Management Scheme: 80% - 100%
- d. **List of all the species in primary feedstock, including scientific name:** Pinus halepensis (Pino carrasco); Pinus pinea (Pino piñonero); Pinus pinaster (Pino rodeno); Pinus nigra (Pino negral); Pinus sylvestris (Pino silvestre);
- e. **Is any of the feedstock used likely to have come from protected or threatened species?** No
 - Name of species: N/A
 - Biomass proportion, by weight, that is likely to be composed of that species (%): N/A
- f. **Hardwood (i.e. broadleaf trees): specify proportion of biomass from (%):** 0,00
- g. **Softwood (i.e. coniferous trees): specify proportion of biomass from (%):** 100,00
- h. **Proportion of biomass composed of or derived from saw logs (%):** 0,00
- i. **Specify the local regulations or industry standards that define saw logs:** N/A
- j. **Roundwood from final fellings from forests with > 40 yr rotation times - Average % volume of fellings delivered to BP (%):** 0,00
- k. **Volume of primary feedstock from primary forest:** 0 N/A
- l. **List percentage of primary feedstock from primary forest, by the following categories. Subdivide by SBP-approved Forest Management Schemes:**
 - Primary feedstock from primary forest certified to an SBP-approved Forest Management Scheme: N/A
 - Primary feedstock from primary forest not certified to an SBP-approved Forest Management Scheme: N/A

m. Volume of secondary feedstock: 0 N/A

- Physical form of the feedstock: N/A

n. Volume of tertiary feedstock: 0 N/A

- Physical form of the feedstock: N/A

Proportion of feedstock sourced per type of claim during the reporting period

Feedstock type	Sourced by using Supply Base Evaluation (SBE) %	FSC %	PEFC %	SFI %
Primary	100,00	0,00	0,00	0,00
Secondary	0,00	0,00	0,00	0,00
Tertiary	0,00	0,00	0,00	0,00
Other	0,00	0,00	0,00	0,00

3 Requirement for a Supply Base Evaluation

Is Supply Base Evaluation (SBE) is completed? Yes

Biosilva Agroforestal defines the Supply Base of the risk analysis as the forest area of the following Autonomous Communities in Spain: Andalusia, Region of Murcia, Valencian Community and Castilla La Mancha (mainly provinces of Cuenca and Albacete), Galicia, Asturias, Cantabria and Basque Country.

Within this supply base Biosilva Agroforestal defines its scope in terms of raw material, “primary feedstock”, coming from forestry works/harvesting: pruning, thinning, clearing and/or final felling mainly of Pinus (with the exception of Euskadi where it is not included in the scope), and Eucalyptus species. In the Communities of the Cantabrian Cornice, especially in the Basque Country, there are plantations of conifers of other species. There may also be holm oak and cork oak occasionally, in the Mediterranean area, as well as other species of broadleaf trees, in the Atlantic area, as a result of their appearance in the areas of forestry works or harvesting. The estimated volume of these species different from the main ones is estimated to be 5% of the total.

Included within this scope is the transportation of the material from the forest to the port facilities, as round wood, stumps, wood chips and, if necessary, the transportation of the chips to the international final port.

The ports of origin act as collection points for the chips which are then loaded onto ships and exported. Biosilva Agroforestal currently has the following active collection points, all of them ports: CASTELLÓN, SAGUNTO, VALENCIA and ALICANTE in the Valencian Community; CARTAGENA in the Region of Murcia; and HUELVA, CADIZ, ALMERÍA, SEVILLA, MOTRIL, MÁLAGA, ALGECIRAS and CARBONERAS in Andalusia.

The transfer of ownership can take place at the port of origin in Spain, or at the destination port, in which case Biosilva Agroforestal takes care of the maritime transport of the material sold

4 Supply Base Evaluation

4.1 Scope

Feedstock types included in SBE: Primary

SBP-endorsed Regional Risk Assessments used: Not applicable

List of countries and regions included in the SBE:

Country: Spain

Indicator with specified risk in the risk assessment used:

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

Specific risk description:

The risk related to this indicator is classified as:

1. low for forestry work/harvesting in the AC of Andalusia, the Valencian Community, Region of Murcia, Castilla La Mancha, Asturias and the Basque Country, and in public contracts in Galicia and Cantabria.
2. specified for work on private properties in Galicia and Cantabria.

Country: Spain

Indicator with specified risk in the risk assessment used:

2.1.1 The BP has implemented appropriate control systems and procedures for verifying that forests and other areas with high conservation value in the Supply Base are identified and mapped.

Specific risk description:

The risk related to this indicator is classified as:

1. low for forestry work/harvesting in the AC of Andalusia, the Valencian Community, Region of Murcia, Castilla La Mancha, Asturias and the Basque Country, and in public contracts in Galicia and Cantabria.
2. specified for work on private properties in Galicia and Cantabria.

Country: Spain

Indicator with specified risk in the risk assessment used:

2.8.1 The BP has implemented appropriate control systems and procedures for verifying that appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12).

Specific risk description:

The risk related to this indicator is classified as:

1. low for forest works carried out in public forests,
2. low for forest works carried out in private forests by companies with valid OSHAS / ISO 45001 certificates
3. specified in terms of work accidents in forest improvement/harvesting works carried out in private forests by any other companies.

Country: Spain

Indicator with specified risk in the risk assessment used:

2.4.2 The BP has implemented appropriate control systems and procedures for verifying that natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b).

Specific risk description:

The risk related to this indicator is classified as:

1. low for pest and disease management
2. low for the management of forest fires in publicly managed forests
3. specified for the management of forest fires in privately managed forests

Country: Spain

Indicator with specified risk in the risk assessment used:

2.2.2 The BP has implemented appropriate control systems and procedures for verifying that feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b)

Specific risk description:

The risk related to this indicator is classified as:

1. low for forestry work/harvesting in pine forests, and in eucalyptus plantations in Andalusia with gradient below 30%
2. specified in clearcut harvests in eucalyptus plantations in Andalusia with gradient over 30%

Country: Spain

Indicator with specified risk in the risk assessment used:

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

Specific risk description:

The risk related to this indicator is classified as:

1. low for forest work/harvesting in public contracts
2. low for forestry work/harvesting on private properties that require prior authorization for the work from the relevant authorities
3. specified for forestry harvesting on private property involving clearcutting eucalyptus trees with a continuous felling area of more than 50 ha.
4. specified for forestry work/harvesting on private properties in Galicia and Cantabria.

Country: Spain

Indicator with specified risk in the risk assessment used:

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

Specific risk description:

The risk related to this indicator is classified as:

1. low for forest biomass with the exception of the following points
2. specified for forest biomass coming from continuous clearcutting of eucalyptus in areas over 50 hectares
3. specified for forest biomass coming from eucalyptus felling in Andalusia in areas with gradients over 30%

4.2 Justification

An analysis of actual situation of forests stands in the SBE have been done.

Two different situations within the SB:

- In north and north west Spain productive forest are predominant, high intense management is more common and there is a significant variety of plantation species and harvesting turnovers. Biosilva still doesn't work in this part of Spain
- In south east Spain there are not significant productive forests, and the forest take a relevant role as climate change barrier or other ecosystem services. Is in this environment where biomass supply chain has activate forest management to provide chips, mostly coming from forest works to improve forest stands

The risk analysis has been approached from positive perspective that from the conjunction of:

- the type of work and genera with which we work,

- the system implemented by Biosilva Agroforestal,
- the level of forest management existing in Spain, and
- the level of control of Public Administrations,

a risk analysis could be carried out based on the indicators defined by SBP in the 8 Autonomous Communities chosen with the necessary risk mitigation measures as appropriate

4.3 Results of risk assessment and Supplier Verification Programme

As a result of the risk assessment low risk was designated for all indicators except 7 with are designated as specified risk: 2.1.1., 2.1.2., 2.2.2., 2.2.4., 2.2.6., 2.4.2 and 2.8.1.

As no unspecified risk is designated, no SVP is needed.

4.4 Conclusion

It is concluded that the risk analysis conducted is adequate, with solid and robust conclusions that adequately focus the steps to be taken by Biosilva Agroforestal to ensure it is compliant with all SBP requirements for the chips it sells as “SBP-compliant primary feedstock”

5 Supply Base Evaluation process

In order to carry out the risk analysis and the SBP certification implementation process, Biosilva Agroforestal has counted on the support of Pablo Gómez-Reino Pérez as well as the company's technical team, both Quality and Forest team.

Pablo Gómez-Reino Pérez is a Forestry Engineer with extensive experience (more than 20 years) in planning, forest management and certification. Since 2000 he has been working in forest management and planning and since 2009 he has been involved in processes related to forest certification on the Iberian Peninsula. He is an auditor of FSC forest management and of FSC and PEFC Chain of Custody. He has carried out more than 120 FSC/PEFC Chain of Custody certification audits as a leading auditor in companies in Spain and Portugal, covering all the chain of custody possibilities and with all types of companies, from small traders or printing shops to large corporations that cover the entire chain of transformation, from the forest to the end product. And more than 40 FSC Forest Management Audits and Assessments as a leading auditor in Spain and Portugal leading multidisciplinary teams in FSC forest management assessments. In January 2015 he received SBP auditor training in Tallinn (Estonia). He has been involved in the process of preparing the SBP risk analysis in Portugal. He also lends support to companies in the preparation processes for obtaining certifications.

In the consultation process, 15 relevant parties were contacted by email, focusing the consultation on industry associations and ecology organisations and environmental experts in May 2019. So far, we have received one response indicating specific environmental issues that have been taken into account to improve the risk analysis.

Biosilva Agroforestal, due to the nature of its work and the feedstock it sells (chips), visits all the places where the materials come from and Technical Forest Team supervises the work, so there is a continuous evaluation process of the suppliers and the work they do. In addition, within the Biosilva Agroforestal quality system, responsible keeps a record of a large extent of the information required by the various indicators.

6 Stakeholder consultation

In the consultation process, 15 relevant parties were contacted by email, focusing the consultation on industry associations and ecology organisations and environmental experts in May 2019. So far, we have received one response indicating specific environmental issues that have been taken into account to improve the risk analysis.

6.1 Response to stakeholder comments

Description: Governamental authority

Comment: Your report seems good, I have nothing relevant to comment. I have inserted a series of “sticky notes” into the report with some minor comments, some of which are just a formality; good luck with it

Response: We replied to the email, giving thanks for the review, and indicating that the comments made would be taken into account

Description: Expert in Certification processes and risk assessments development

Comment: Indicator 1.5.1. Just the Cantabrian Cornice seems strange if the geographical scope of the study is much more extensive

Response: We have made the change, including Spain

Description: Expert in Certification processes and risk assessments development

Comment: Indicator 2.1.1. This expression (“it is necessary to have the relevant heritage authorisation”) is strange, although nearly all Spaniards would understand it, but I suppose it means something like “... relevant authorisation from the authorities responsible for cultural and historical heritage” or something like that.

Response: We have made the change, including the suggested wording

Description: Expert in Certification processes and risk assessments development

Comment: Indicator 2.1.3. I suppose you know about the felling of the oak stands, especially in Galicia, to plant eucalyptus, even in Natura 2000 sites. In an FSC forest management audit we were told that about this and there were numerous complaints about the administration for these situations. Although there are other measures in this system to ensure that the wood from these eucalyptus trees does not reach the biomass involved, perhaps it would be a good idea to mention the possibility of this and make it clear that the company checks there are no complaints

Response: That is why the previous paragraph states the following: “The most problematic situation is in Galicia where it is clear that, with the data reporting the increase in the area of eucalyptus trees in the last 20 years, there are both legal and illegal transformations to this species. However, the area that comes from native hardwood cuts, although it exists, does not appear to be relevant. All the data on the Galician areas checked indicate that the surface areas of native hardwood are also increasing in Galicia”

Description: Expert in Certification processes and risk assessments development

Comment: Indicator 2.2.4. In this paragraph I would include something about the concept of "limitation", which is something that companies usually strongly oppose, but is often the only thing that actually works. Perhaps this could also apply to the mitigation measures of indicator 2.1.2.

Response: We have made the change, including the suggested alteration: Indicator 2.2.4: "work is limited establishing the measures necessary to protect the elements present, such as, for example, the delimitation of zones or employing qualified personnel to biologically monitor the flora and/or fauna that may be affected by the works". Indicator 2.1.2: "In a positive case, a field visit is carried out prior to starting the work, establishing the corresponding limitations to be applied to the work to avoid any damage to the High Value elements of the threats detected. In turn, at the end of the work, another visit will be made to check that the protected element has not been affected. All of this is duly documented in the work file and included in the corresponding Forestry Management Technical Plan."

7 Mitigation measures

7.1 Mitigation measures

Country: Spain

Specified risk indicator: 2.1.2 The BP has implemented appropriate control systems and procedures to identify and address potential threats to forests and other areas with high conservation values from forest management activities.

Specific risk description: The risk related to this indicator is classified as:

1. low for forestry work/harvesting in the AC of Andalusia, the Valencian Community, Region of Murcia, Castilla La Mancha, Asturias and the Basque Country, and in public contracts in Galicia and Cantabria.
2. specified for work on private properties in Galicia and Cantabria.

Mitigation measure: For work on private properties in Galicia and Cantabria, for the correct identification and correction of threats to high conservation values (natural or cultural), the following methodology is considered necessary (to be completed before the forestry work/exploitation is carried out):

1) Biosilva Agroforestal must check on the available GIS data viewers to see if the plot(s) where it is going to work overlap with any high conservation values.

- If there is no overlap, the work can go ahead with no need for any additional mitigation measures.
- If there is an overlap:
 - * the element of high conservation value is identified,
 - * it is noted in the work file,

2) check whether or not it exists in the work area,

- If it does not, the work can go ahead with no need for any additional mitigation measures.
- If it does exist in the work area:

3) The Forestry Management Technical Plan will be implemented for the

area under work, determining the possible threats (if existing) of the management activities to the protected element.

- If no threats to the protected elements are identified, the work can go ahead with no need for any additional mitigation measures.
- If any threats are identified, a field visit is carried out prior to starting the work, establishing the corresponding limitations to be applied to the work to avoid any damage to the High Value elements of the threats detected. In turn, at the end of the work, another visit will be made to check that the protected element has not been affected. All of this is duly documented in the work file and included in the corresponding Forestry Management Technical Plan.

Biosilva Agroforestal has the appropriate technical means to check that the sites where it is going to work are fully cross-checked with any relevant element of high conservation values and to determine any possible threats (available GIS data viewers of the Autonomous Communities: Natura 2000 Network, Protected Natural Areas, Sites of Cultural Interest) and appropriate procedures to deal with these possible threats, including the training of its own workers as well as the workers of its subcontractors.

In addition, Biosilva Agroforestal also has appropriate procedures in place (CoC FSC certification) to ensure that this information reaches its chip suppliers (primary feedstock) so that it is taken into account in the work to be carried out.

Country:	Spain
Specified risk indicator:	2.1.1 The BP has implemented appropriate control systems and procedures for verifying that forests and other areas with high conservation value in the Supply Base are identified and mapped.
Specific risk description:	The risk related to this indicator is classified as: 1. low for forestry work/harvesting in the AC of Andalusia, the Valencian Community, Region of Murcia, Castilla La Mancha, Asturias and the Basque Country, and in public contracts in Galicia and Cantabria. 2. specified for work on private properties in Galicia and Cantabria.
Mitigation measure:	For work on private properties in Galicia and Cantabria, although the administrations still have control, it is considered necessary for the correct identification and defining of the high conservation values (natural or cultural) for Biosilva Agroforestal to check on the available GIS data viewers to see if the plot(s) where it is going to work overlap with any high conservation values (cross-checking the plot with the data layers on the Natura 2000 network, Protected Natural Areas, Sites of Cultural Interest).

If there is an overlap:

1. the element of high conservation value is identified,
2. it is noted in the work file,
3. checks are carried out to see whether or not it exists in the work area.

Country: Spain

Specified risk indicator: 2.8.1 The BP has implemented appropriate control systems and procedures for verifying that appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12).

Specific risk description: The risk related to this indicator is classified as:

1. low for forest works carried out in public forests,
2. low for forest works carried out in private forests by companies with valid OSHAS / ISO 45001 certificates
3. specified in terms of work accidents in forest improvement/harvesting works carried out in private forests by any other companies.

Mitigation measure: In order to mitigate the specified risk, two scenarios are established:

1. Companies that do not have valid OSHAS or ISO 45001 certification. In this case, in order to classify the work as low risk, the following will be required:

- Complete information on H&S. For site personnel: Social Security registration, training and adequate information on the job, delivery of Personal Protective Equipment, as well as having passed the corresponding Medical Examination. For the machinery: CE Marking or Conformity Certification and if it is registered, to have the corresponding Driving Licence and to have passed the corresponding MOT.

- Good Forestry Practices Manual and accreditation of its implementation.

- Accident report from the mutual insurance company for the last year with accident rates below the threshold defined for high accident rates (> 7 minor accidents in a year or > 1 serious accident).

These companies are approved within the Biosilva system as "Suitable without a valid quality system".

When a company does not provide any of the required information, it is classified as "Not Suitable" and the material it offers/works on cannot be considered within the SBP SB.

2. Companies that do not have valid OSHAS or ISO 45001 certification and a high accident rate (> 7 minor accidents in a year or > 1 serious accident).

In this case, in order to classify the work as low risk, in addition to the information required in point 1, it will be necessary to carry out an on-site audit of the performance of forestry work with positive results: no serious faults and a maximum of 5 minor faults.

The field audit can be carried out in works other than the one where the material originates. The Biosilva models IM-19-PPI "List of Inspection Points" and M-02 SBP Part OPS are used to carry it out. The results must be available before the material is transported to the port.

These companies are approved within the Biosilva system as "Suitable without valid quality system".

When the results of the field audit are not positive: with serious faults or > 5 minor faults, the company is categorised as "Not Suitable" and the material offered/worked cannot be considered within the SBP SB.

Country:	Spain
Specified risk indicator:	2.4.2 The BP has implemented appropriate control systems and procedures for verifying that natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b).
Specific risk description:	The risk related to this indicator is classified as: 1. low for pest and disease management 2. low for the management of forest fires in publicly managed forests 3. specified for the management of forest fires in privately managed forests
Mitigation measure:	For this indicator and given the variability of requirements and the different level of implementation of measures required by the competent administrations, a decision tree is established to guide the process of mitigating the risk in each of the forests of origin.

As a preliminary, we indicate that, in under-managed stands such as most of those found in the private forests of South East Iberian Peninsula, the proposed actions (silvicultural treatment/clearing) have positive effects on the prevention of forest fires, by reducing the fuel load and the horizontal and vertical continuity in the forest.

In addition, in all the works carried out by its teams, Biosilva Agroforestral develops the Environmental Emergency Plan in order to reduce the risk of fires during the execution of the works.

Decision tree for risk mitigation in forest fire management:

1. Technical documentation required by Administration regarding forest fire defence. Does the competent administration require to have any specific technical document on forest fire defence?

1.a. Yes. Does the landowner have such a document approved by the competent administration?

1.a.1. Yes. Low risk

1.a.2. No. Go to 3

1.b. No. Go to 3

2. Other supporting technical documentation. Does the forest have any technical document in force that describes the situation and needs of the forest with regard to forest fire prevention: Management Project/Dasocratic Plan, Technical Report, Descriptive Report, Timber Harvesting Plan...?

2.a. Yes, are the measures indicated in this documentation developed or does the work form part of their development?

2.a.1. yes. low risk

2.a.2. No. Go to 4

2.b. No. Go to 4

3. Forest study. When there is no supporting technical documentation for the low risk designation or it exists but is not developed, a case-by-case study of the work and the forest fire defence situation of the forest is carried out:

(a) is there any evidence that the competent administration is satisfied with the forest fire management situation of the forest?

(b) is there any fire protection infrastructure in the forest or in the vicinity of the forest?

(c) do the works to be carried out include any forest fire defence infrastructure: firebreak area or strip, firebreak...?

(d) Are there any other aspects that help to mitigate the risk? In this case, a report with justification is required.

3.a. Is the answer positive to at least 2 of the above 4 questions and is there a report with a clear justification?

3.a.1. Yes. Low risk.

3.a.2. No. Material Not Suitable for the SBP SB

This decision tree must be completed before the end of the works (to avoid unsuitable material entering the SBP SB) and involves the Technical Director of Biosilva Agroforestal and the consultant of Biosilva, a Forestry Engineer.

In case of not being able to justify low risk in forest fire management, the material coming from this forest/work will not be able to enter the SBP SB.

Country:

Spain

Specified risk indicator: 2.2.2 The BP has implemented appropriate control systems and procedures for verifying that feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b)

Specific risk description: The risk related to this indicator is classified as:

1. low for forestry work/harvesting in pine forests, and in eucalyptus plantations in Andalusia with gradient below 30%
2. specified in clearcut harvests in eucalyptus plantations in Andalusia with gradient over 30%

Mitigation measure:

In eucalyptus harvests in Andalusia, the Government of Andalusia usually limits the work in the felling licence to avoid any risk to the quality and structure of the soil. Specifically, one of the measures that is usually established in sloping areas is the prohibition of removing the stumps in order to ensure the grip of the land.

In all circumstances, for biomass from the clearcutting of eucalyptus trees on gradients of over 30%, Biosilva carries out field visits to make sure that all the specifications/limitations established in the felling licence have been followed and that the soil has not been damaged.

With regards Biosilva's methods used for work that is not carried out under its responsibility, i.e., where Biosilva buys the wood or chips, it has procedures in place to identify the origin of the feedstock and always asks for the relevant information concerning the work; contract, felling licence, permits... prior to purchasing the material.

Biosilva has a system in place to evaluate suppliers to register them on its system so it can work with them. Once the supplier has passed this stage and been certified to ensure it complies with the general procedures, the relevant documentation is requested for each harvest from which the wood is taken to provide the feedstock sold to Biosilva.

It is at this point that Biosilva undertakes the necessary checks to make sure that in areas with gradients of over 30% the limitations established in the permits are followed and to ensure that there is no significant impact on the soil, its quality and structure during the work. Biosilva goes to visit the forestry works while they are being carried out.

Biosilva also has a Manual of Good Forestry Practices, which focuses on aspects such as preserving the ecosystem, caring for the soil, reducing the risk of fire, waste management, etc. Biosilva issues this Manual to its supplier companies before starting the forestry work and then supervises the degree of compliance with the good practices listed.

Country: Spain

Specified risk indicator: 2.2.4 The BP has implemented appropriate control systems and procedures to ensure that biodiversity is protected (CPET S5b).

Specific risk description:

The risk related to this indicator is classified as:

1. low for forest work/harvesting in public contracts
2. low for forestry work/harvesting on private properties that require prior authorization for the work from the relevant authorities
3. specified for forestry harvesting on private property involving clearcutting eucalyptus trees with a continuous felling area of more than 50 ha.
4. specified for forestry work/harvesting on private properties in Galicia and Cantabria.

Mitigation measure:

For work on private properties in Galicia and Cantabria, the following methodology is considered necessary for appropriate protection of biodiversity (to be completed before the forestry work/exploitation is carried out):

1) Compile all the information available on biodiversity elements present in the work area, which can be done by Biosilva Agroforestral personnel on the visits prior to purchasing the material or through information obtained from the supplier.

Elements of biodiversity to be evaluated in each specific situation by specialist Biosilva Agroforestral personnel may be: banks, microhabitat, mesohabitat, special species in the environment, protected species, ecotones...

a. If this does not apply (there are no biodiversity elements in the work area), the work can go ahead with no need for any additional mitigation measures.

b. If this does apply:

* it is noted in the work file

* work is limited establishing the measures necessary to protect the elements present, such as, for example, the delimitation of zones or employing qualified personnel to biologically monitor the flora and/or fauna that may be affected by the works,

* at the end of the work, a visit will be made to check that the protected

elements have not been affected. All of this is duly documented in the work file by qualified personnel

Biosilva Agroforestal has the appropriate technical means to identify elements of biodiversity to be protected in work areas and the correct procedures to approach their protection, including the training of its own workers as well as the workers of its subcontractors.

In addition, Biosilva Agroforestal also has appropriate procedures in place (CoC FSC certification) to ensure that this information reaches its chip suppliers (primary feedstock) so that it is taken into account in the work to be carried out

In cases of clearcutting eucalyptus trees in areas of over 50 hectares, which may occur mainly in Andalusia, the following work methodology is established:

1. Inspection of the felling licence to determine the limitations established with regards the elements of biodiversity.
2. Identify the elements of biodiversity to be protected, if any, during the prior field visit. Elements of biodiversity may be: banks, microhabitat, mesohabitat, strips of indigenous vegetation, strips of scrubland, special species in the environment, protected species, ecotones...
3. If such elements are detected, the work is limited establishing the measures necessary to protect the elements present
4. On the final visit to the work area, check that the protected elements have not been affected, and then note then duly note this in the work file

In addition, and in order to prevent any associated impact, checks are carried out in the harvest area to see if there are any plant stands with more than 50 hectares of continuous clearcutting (areas in which there are no elements of discontinuity: banks, strips of vegetation/scrubland...). If there are, as well as the methodology stated above, the stand will be compartmentalised so that felling of areas of over 50 hectares is not carried out again in the same year, so the stand will be felled in successive years until the harvest is completed.

Country: Spain

Specified risk indicator: 2.2.6 The BP has implemented appropriate control systems and procedures to verify that negative impacts on ground water, surface water and water downstream from forest management are minimised (CPET S5b).

Specific risk description: The risk related to this indicator is classified as:

1. low for forest biomass with the exception of the following points
2. specified for forest biomass coming from continuous clearcutting of eucalyptus in areas over 50 hectares

3. specified for forest biomass coming from eucalyptus felling in Andalusia in areas with gradients over 30%

Mitigation measure:

In eucalyptus harvests in Andalusia, the Government of Andalusia usually limits the work in the felling license to avoid any negative impacts. Specifically, one of the measures that is established is to respect river banks and water courses, as well as the prohibition of removing the stumps in order to ensure the grip of the land and make sure the water is not affected.

For biomass coming from clearcut harvesting of eucalyptus trees in areas of over 50 hectares or in areas with a gradient of over 30%, Biosilva makes sure that all the specifications/limitations established in the felling licence are followed and that the water courses are not damaged.

To do this, the following steps are established for these cases:

1. Inspection of the felling licence to determine the limitations established with regards water courses
2. Identify the elements to be protected, if any, during the prior visit. Elements to be protected may be: water courses, banks, strips of indigenous vegetation, strips of scrubland, stumps...
3. If such elements are detected, the work is limited establishing the measures necessary to protect the elements present
4. On the final visit to the work area, check that the protected elements have not been affected, and then note then duly note this in the work file

Biosilva Agroforestal has the appropriate technical means to identify elements to be protected in work areas and the correct procedures to approach their protection, including the training of its own workers as well as the workers of its subcontractors.

In addition, Biosilva Agroforestal also has appropriate procedures in place (CoC FSC certification) to ensure that this information reaches its chip suppliers (primary feedstock) so that it is taken into account in the work to be carried out.

7.2 Monitoring and outcomes

2019

Biosilva Agroforestal already had a system for checking the work, as well as the documentation necessary for the work it carried and the work carried out by its suppliers. The mitigation measures specified in indicator 2.8.1 in force since the evaluation has been added to this system: supplier/forestry work verification system.

During this period, Biosilva Agroforestal has evaluated 3 (Biomasa Carbodiaz, Dunas 2000 and Medina Forestal) of the 6 suppliers with which it has worked (Biomasa Carbodiaz, Dunas 2000, Medina Forestal, Astillas Andalucía, Toasa and Valfor).

As a result of the inspections carried out and the documentation compiled, Dunas 2000 has been classed as category A with very satisfactory execution, and Biomasa Carbodiaz and Medina Forestal have been classed as category B with good results, as in both cases a slight fault was detected (for CarboDiaz it was a verbal issue and for Medina Forestal it was an issue of written non-conformity) resulting from problems with the sizes and dirtiness of the chips supplied. There were no significant occupational accidents at any of the works and suppliers inspected.

For each supplier and inspection an Excel file of the inspection points programme has been completed.

In view of this data, the implemented system is deemed to be effective and it is advisable to continue using it.

In turn, based on this audit, the monitoring process shall include an additional 6 indicators with specified risk: 2.1.1., 2.1.2., 2.2.2., 2.2.4, 2.2.6. and 2.4.2. for which mitigation measures have been developed.

2020

In this period, the implementation of the mitigation measure of indicator 2.8.1 of H&S with approval system of suppliers / forestry works has been maintained.

The company approval system has been altered in such a way that, through information collected in the field by the Technical Manager of the work or by those in charge of the execution area, the check list is completed IM -19-PPI "List of Inspection Points" with information related to H&S and the M-02 SBP Part OPS with the most relevant elements of the use of security measures on field (new). With the information obtained from these two lists, the person in charge of the Integrated Management System completes Form IM-01-SBP "List of Evaluated Suppliers".

In this period, Biosilva Forestal has evaluated 3 suppliers: Noceda S.L., Explotaciones Forestales Ricky Rodríguez, S.L. and Topal Forestal, S.L., formerly Tomás Aserradero.

As a result of the inspections carried out and the documentation collected, Noceda S.L. has been included in category A for very satisfactory execution, and Explotaciones Forestales Ricky Rodríguez, S.L. and Topal Forestal, S.L. in category B of execution with good results. The only recorded incident has affected Ricky Rodríguez in which it is commented: "It is observed by field personnel that the wood is poorly stockpiled, in addition to the deliveries in port, it comes with many remains of mud and stones. communicates verbally to solve the incident ". In none of the inspected jobs and suppliers have there been serious work accidents.

A program of follow-up visits to suppliers is established according to their category which, in the case of Category A and B suppliers, are completed annually by the person in charge of the Integrated Management System, through information collected in the field by Technical Manager of the forest work or by those in charge of the execution area, the checklists: IM-19-PPI "List of Inspection Points" and M-02 SBP Part OPS. Files have been completed for each supplier and inspection.

Deficiencies in the implementation of mitigation measures have been detected in the period, so it is advisable to improve it by focusing on continued work throughout the period and a priori (before starting work). In addition, the approval system has been updated, redefining the program of follow-up visits.

In the indicators: 2.1.1., 2.1.2., 2.2.2., 2.2.4 and 2.2.6. It has not been necessary to carry out the implementation of the measures since Biosilva Agroforestal has not worked in eucalyptus or in the North of the Iberian Peninsula.

In indicator 2.4.2 the mitigation measure has been implemented regarding the defense against forest fires in private lands.

In this case, the implementation of the mitigation measure has been deficient in the period, since the information has been collected a posteriori to carry out the works and even to dispose of the material in the port.

A review of two works on private lands has been carried out:

1.

Finca Casa Molina in Masegoso and Peñascosa, Albacete.

In the case of the Junta de Comunidades de Castilla La Mancha (JCCLM), public administration assumes the responsibilities regarding the prevention and defense against fires, without having found that the owners have obligations in this regard, beyond following the indications of forest administration.

The JCCLM has a Forest Fire Defense Master Plan that defines high risk areas for forest fires (ZAR). In each of these zones, Regional Plans for the Defense against Forest Fires are drawn up or will be drawn up, in which the first and second order Defense Area Networks (RAD) are defined and a proposal for the location of this network is identified. In turn, the road network to be maintained and improved and the network of water points are identified.

Finca Casa Molina, in Masegoso and Peñascosa (Albacete) has 857 ha, of which 100 ha are being worked and is located within the ZAR of the Sierra de Alcaraz y Segura, with an elaborated District Plan. It does not have a Management Plan, although its preparation is planned. The management is carried out in coordination with the indications of the public administration, in such a way that when actions or works are planned they are presented to the public administration, which approves them with their associated conditions. In turn, its execution is carried out under the supervision of the forestry agents of the Region.

As the Biosilva Agroforestal staff has been able to corroborate and can be seen in the orthophoto, the farm has a firebreak derived from the District Plan and which has been carried out and is maintained by the Autonomous Community.

2. Finca Casa Vieja in Biar, Alicante.

Finca Casa Vieja has a Management Plan approved by Generalitat Valenciana, prepared in October 2019. The "finca" is divided into two enclosures, both perimeter fenced by hunting mesh, and the main track that serves the public forest of Biar runs through the southwest-northeast direction.

In the management plan it is indicated, point 4.3.2 of fire defense infrastructures, that the "finca" has actions framed in the Forest Fire Prevention Plan of the Alcoy Demarcation (firebreak area of order 2 on the main track that serves the public forest of Biar), planning two other infrastructures further: perimeter firebreak and crop protection firebreak designed as firebreak areas of order 3.

Both infrastructures have been executed under the indications of the forestry agent in the area, in the work that Biosilva Agroforestal is carrying out on the "finca".

As a complement to the above, Biosilva Agroforestral prepares, for each forest farm that is the object of forest works, an Environmental Emergency Plan to act in the event of a Forest Fire. This Plan will be delivered, prior to the start of the works, both to Biosilva Agroforestral workers and to the Suppliers with whom the product is contracted, being mandatory to have a copy in the forest farms object of the forest works.

Given the deficiencies detected in the implementation of mitigation measures, Biosilva Agroforestral has drawn up the following action plan:

- Specification and development of the defined mitigation measures (especially in indicator 2.4.2), in order to cover the different cases that appear in the work and clearly define the action guide in each of them and the necessary conditions for, before to start the works, to be able to determine low risk and therefore, make possible the use of the raw material as SBP compliant biomass.
- Development and implementation of a business management system "Microsoft Dynamics" in the cloud, which allows optimizing the control and documentation / management processes. Within this system, the workflows will be configured so that the documentation required by the mitigation measures is incorporated by default as a prerequisite to start any work.
- Involvement of the Forestry Engineer / Biosilva consultant in the forest certifications in the control of the effective implementation of the mitigation measures prior to the start of the works.

With this action plan, the problem detected is considered to have been addressed and adequate compliance with the SBP certification is ensured.

February 2021

The action plan designed to resolve the deficiencies detected has been implemented.

In general, Biosilva Agroforestral is developing, for its implementation, a business management computer system "Microsoft Dynamics" in the cloud that allows optimizing the control and documentation / management processes. Within this system, a document manager will be defined with the workflows configured so that the documentation required by the mitigation measures is incorporated by default as a (pre) requirement in the works / forestry works. This system is still in testing.

Currently, in transition until its implementation, it is working with an Excel file: *"Biosilva 2020-2021 supplier and forest monitoring record"*, which records all the necessary information for each of the forests worked in order to mitigate the specified risks identified.

In this period, work has been done in Levante, with two indicators with specified risks: 2.8.1. and 2.4.2.

Indicator 2.8.1.

The risk designation has been modified, including in the low risk the work on private farms carried out by companies with valid OSHAS / ISO 45001 certificates. At the same time, the mitigation measure has been redone, simplifying it and redesigning contractors approval system.

In the Excel file: *"Biosilva 2020-2021 supplier and forest monitoring record"*, for this indicator, the following is recorded in each of the jobs:

- the duration of the works,
- the workers involved and their role in the team,
- the machinery involved,
- SyS records,
- the accident report and
- In the event that there has been an accident, the record of the accident investigation and the implementation of corrective measures to prevent its recurrence.

At an operational level, Biosilva Agroforestal has begun to prioritize, in order to obtain raw material (feedstock) for the supply base (SB) of its SBP certification, the works carried out with its own means. In fact, since July 2020, all the works in private forests that make up the SBP have been executed by Biosilva's own means and, since Biosilva Agroforestal has a quality system with a valid OSHAS / ISO 45001 certificate, they are classified as low risk.

Therefore, in this period from September 2020 to February 2021, work has been done on 11 forests of which 5 were public forests (low risk) and 6 private forests, in which in all cases, the work has been carried out by Biosilva Agroforestal (low risk).

Indicator 2.4.2.

For this indicator, and given the variability of requirements and the different level of implementation of measures required by the competent administrations, the mitigation measure has been redone, a decision tree has been developed to guide the process in each of the forests of origin of the SBP Supply Base.

This decision tree must be completed before the completion of the works (to prevent unsuitable materials from entering the SBP SB) and it involves the Technical Director of Biosilva Agroforestal, graduated in Forest Engineering, and the consultant from Biosilva, Forestry engineer. In case of not being able to justify low risk in the management of forest fires, the material from this forest / work will not be able to enter the SBP SB.

In the Excel file: *"Biosilva 2020-2021 supplier and forest monitoring record"* the work data, the results of the risk designation analysis and the supporting documentation that justify this designation are recorded.

In this period, from September 2020 to February 2021, work has been done on 11 forests of which 5 were public forests and 6 were private forests. In the 6 private forests, the study carried out has allowed them to be classified as low risk for forest fire management, see details in point 13.2.

October 2021

Implementation of action plan was verified and new Excel sheet of monitorización of forest works was presented, *"Biosilva 2020-2021 supplier and forest monitoring record"*.

12 forest works were evaluated and monitoring results presented:

* In the period since last review, all forest works were made by Biosilva by its own means so low risk was ensured for indicator 2.8.1 as new risk mitigation defined for OSHAS/ISO 45001 companies.

* Regarding indicator 2.4.2, all forest works were evaluated with information available for each one and low risk was concluded for all except one (TRABAJOS SELVÍCOLAS EN FINCA PARTICULAR LA CANALEJA. MORATALLA, MURCIA, private forest) which was excluded from SBP SB.

So, it was concluded low risk and SBP compliant material for 12 forest works and specified risk and material excluded from the SBP SB for 1 forest work.

8 Detailed findings for indicators

Detailed findings for each Indicator are given in Annex 1 in case the Regional Risk Assessment (RRA) is not used.

Is RRA used? Yes

9 Review of report

9.1 Peer review

Prepared by Juan Manuel Canelo, Director of Quality at Biosilva Agroforestal and reviewed by Pablo Gómez-Reino Pérez, Forestry Engineer and external consultant who collaborates with the company in the implementation of the SBP certification.

9.2 Public or additional reviews

As mentioned, a stakeholder consultation was carried out and their contributions incorporated into the final report.

10 Approval of report

Approval of Supply Base Report by senior management			
Report Prepared by:	Juan Manuel Canelo	Quality Director Biosilva	18 Aug 2020
	Name	Title	Date
The undersigned persons confirm that I/we are members of the organisation's senior management and do hereby affirm that the contents of this evaluation report were duly acknowledged by senior management as being accurate prior to approval and finalisation of the report.			
Report approved by:	David Holgado Thornhill	General Manager	18 Aug 2020
	Name	Title	Date

Annex 1: Detailed findings for Supply Base Evaluation indicators

N/A