

Supply Base Report: INTEGRA FUELS S.L.

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Completed in accordance with the Supply Base Report Template Version 1.2

*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:	Integra Fuels S.L.
Producer location:	Calle Oro 55, 28770, Colmenar Viejo, Madrid, Spain
Geographic position:	See Google Maps
Primary contact:	David Holgado Thornhill; Calle Oro 55, 28770, Colmenar Viejo, Madrid, Spain; 606302791; admin@integra-fuels.com
Company website:	http://integra-fuels.com
Date report finalised:	28/Jun/2018
Close of last CB audit:	Assessment
Name of CB:	NEPCon
Translations from English:	No
SBP Standard(s) used:	sbp-standard-1-feedstock-compliance-standard-v1-0; SBP-standard-2-verification-of-sbp-compliant-feedstock-v1-0; sbp-standard-4-chain-of-custody-v1-0; sbp-standard-5-collection-and-communication-of-data-v1-0
Weblink to Standard(s) used:	https://sbp-cert.org/documents
SBP Endorsed Regional Risk Assessment:	N/A
Weblink to SBE on Company website:	https://integra-fuels.com/certification

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

2 Description of the Supply Base

2.1 General description

According to data from the INE (Spanish National Institute of Statistics), Spain has the third highest forest cover in the European Union (18,417,900 hectares) after Sweden and Finland. The total forest area represents 27.7 million hectares, which is equivalent to 54.8% of the Spanish territory. According to data from MAPAMA (currently two Ministries: the Ministry of Agriculture, Fisheries and Food, and the Ministry of Ecological Transition), 36% of forest cover corresponds to public domain forests that belong to the State, to the Autonomous Communities (AC), to local organisations and to other organisations under public law; and 64% is private forests owned by individuals or legal entities under private law and are either individually or co-owned, which can be further categorised into 1) collectively-owned which represent 7% of the total, and 2) private forests, with a significant superficial variability according to the different zones, from the Galician micro-property to the large estates in other Autonomous Communities, which represent 57%.

Integra Fuels S.L. defines the Supply Base as the Autonomous Community (AC) of Andalusia, the Region of Murcia, and the Valencian Community. The Autonomous Communities have well-entrenched and well-mapped boundaries in terms of both their borders and their forests. We analyse each using the statistical data available (IFN3 and 2012-2013 statistical data from the Ministry of the Government of Spain).

Andalusia:

- Andalusia has 2,920,000 hectares of forest cover on a total of 4,467,000 hectares of forest area.
- In terms of ownership, private forests represent 73.4% of the total, while public forests represent 26.6%. The public area is divided practically in half, with one part belonging to the Government of Andalusia or the State and the other to local entities.
- In terms of species, *Quercus* oak stands are dominant (35%). Pine trees, genus *Pinus*, account for 19% of the forest, and eucalyptus, genus *Eucalyptus*, 4.6%.

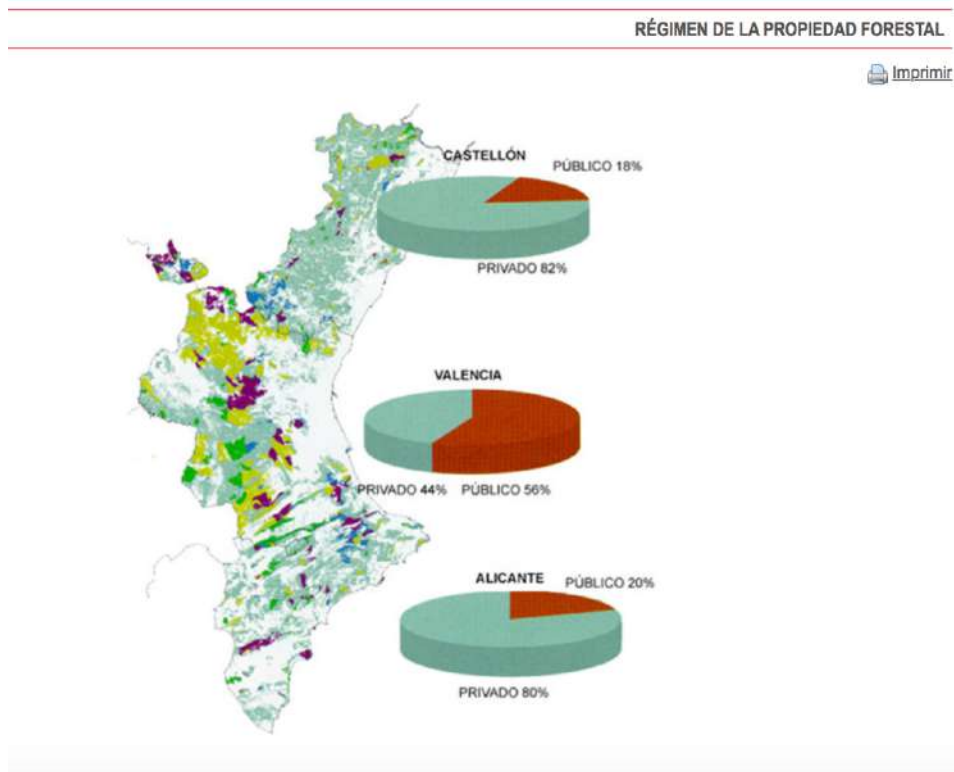
La vegetación forestal andaluza

TERRENOS	ESPECIES	SUPERFICIE (MILES DE HA)	% SOBRE SUPERFICIE FORESTAL
Arbolados	Quercus	1.511,3	34,8
	Coníferas	824,7	19,0
	Eucaliptal	202,1	4,6
	Otras frondosas y mezclas	103,0	2,4
Total terrenos arbolados		2.641,1	60,8
Desarbolados	Matorral mediterráneo noble	242,0	5,6
	Matorrales dispersos	306,2	7,0
	Otras formaciones	1.156,2	26,6
Total terrenos desarbolados		1.704,4	39,2
Total forestal		4.345,5	100,0

- According to IFN3 data, the stock of Andalusian forests is 75,000,000 m³ of wood. The autonomous community felled a total of 406,000 m³ of wood in 2012.

Valencian Community:

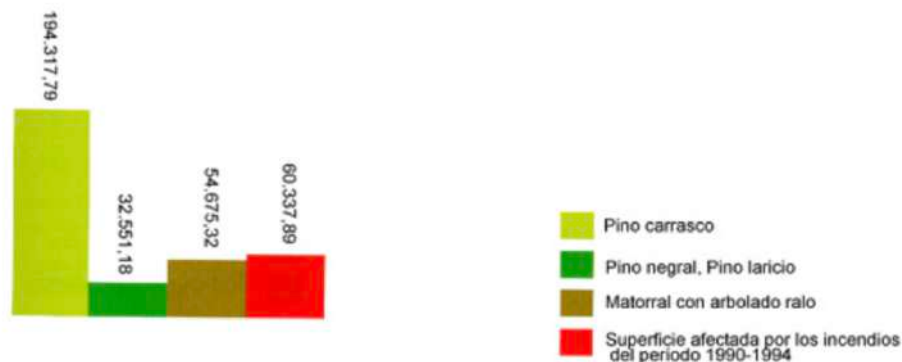
- The Valencian Community has 748,000 hectares of forest cover on a total of 1,267,000 hectares of forest area.
- In terms of the ownership scheme, private forest clearly predominates, except in the province of Valencia:



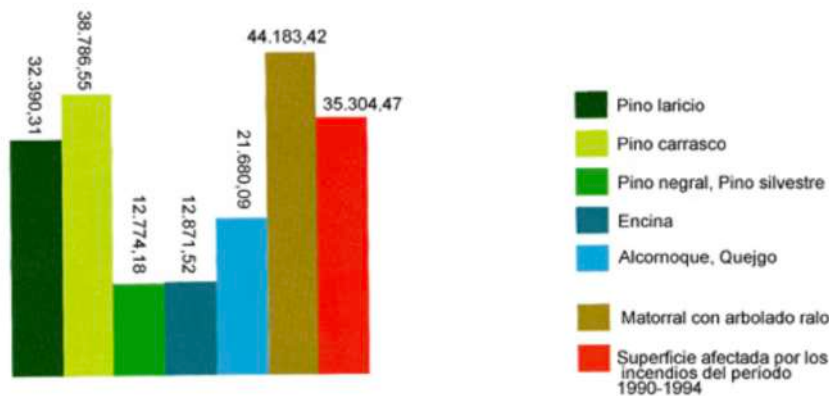
“The forest area in the Valencian Community is characterised by a dominance of private smallholdings (more than half of the private area is formed by farms of less than 1 ha), which are also strongly tied to and interconnected with agricultural use”.

- In terms of species, pines are the dominant species in the Community’s wooded area, as can be seen in the following graphs that represent the area each species (Aleppo pine = *Pinus halepensis*, Black pine = *Pinus nigra*, Scots pine = *Pinus sylvestris*) covers in each of the provinces:





El pino Carrasco domina notablemente en Valencia



Los pinares de pino Laricio y Carrasco predominan en Castellón

- According to IFN3 data, the stock of Valencian forests is 20,000,000 m³ of wood. The autonomous community felled a total of 248,000 m³ of wood in 2012.

Region of Murcia:

The Region of Murcia has 302,000 hectares of forest cover on a total of 487,000 hectares of forest area.

- In terms of the ownership scheme, private forests represent 70% of Murcia's forest area. Of the 30% of public forests, 60% are owned by local entities and 40% to the regional or central administration.
- In terms of species, pines, both in natural and repopulated stands, clearly dominate the community's forests:

Región de Murcia: Características forestales

- Su localización "bio y ecogeográfica" favorece la presencia de **endemismos iberoafricanos**
- Sistemas forestales de los más singulares y significativos del continente europeo
- Diversidad florística con **más de 2.000 especies vegetales**
- Clima típicamente mediterráneo: marcada aridez e irregularidad pluviométrica que favorece las formaciones de matorrales (63% de la superficie forestal):

Entre los **matorrales** se distingue :

- matorral noble (*Pistacia, Quercus, Rhamnus, Chamaerops, Maytenus, Arbustus*, etc.).
- matorral característico de etapas regresivas (romeral, espartizal, albardinal, tomillar, etc.).

Entre las **formaciones arbóreas** se distinguen:

- especies frugales, especialmente pinos, tanto los naturales como los procedentes de la repoblación.
- sabinas y quercineas xerófilas (encina y coscoja).

En los **montes arbolados** las distribuciones de estas formaciones son:

- 96% coníferas.
- 4% de frondosas.



Región de Murcia
SUPERFICIE FORESTAL ARBOLADA

Especie dominante	Superficie(Ha)
<i>Pinus halepensis</i>	233.401
<i>Pinus nigra</i>	14.095
<i>Pinus pinaster</i>	13.047
Otras coníferas	45.574
Total	305.116
<i>Quercus</i>	11.176
Total	316.292



- According to IFN3 data, the stock in Murcia's forests is 9,116,000 m³ of wood. The autonomous community felled a total of 1,368 m³ of wood in 2012.

Within this area, Integra Fuels defines its scope of primary feedstock from forestry works/harvesting: pruning, thinning, clearing and/or final felling of *Pinus* and *Eucalyptus* species. Included within this scope is the transportation of the material (as round wood, stumps, wood chips) from the forest to the port facilities and, if necessary, the transportation of the chips to the international final port.

Regarding the defined Supply Base, various species of the genus *Pinus* are found in three Autonomous Communities, while various species of genus *Eucalyptus* are only found in Andalusia.

In terms of the forestry works, origin of the primary feedstock, Integra Fuels can:

1. directly perform forestry works/harvesting with our own or subcontracted equipment, under its responsibility, or
2. buy the feedstock from companies that have done the work

In both cases, the works can come from:

- Public contracts, in which case the harvesting areas are always identified and mapped in the specifications that define the contracting of the work.
- Contracts in private forests, in which case a Management Plan may be available that identifies the work zones or access to the cadastral reference of the affected parcel(s), together with the private contract that covers the work.
- It is crucial to always have the corresponding authorisations by the Autonomous Communities, which will specify the work areas; these must be received before work can begin.
- Forestry work in both public and private forests is subject to the guidelines set by the Public Administration, as well as to the supervision of Public Administration staff.

In Spain, cadastral information on urban and rural properties throughout the country is available. All properties have a unique cadastral reference that allows them to be identified and located. *"The cadastral reference is the official and obligatory identifier of properties. It is an alphanumeric code, consisting of twenty characters, which is assigned by the Cadastral Registry to ensure that every property has a single cadastral reference. The cadastral reference makes it possible to locate the property on a cadastral map"*.

A study conducted by COSE (Spanish Confederation of Forest Organisations) and published by MAPAMA in 2013 concluded that the degree of management by the forest authority is high or very high in all Autonomous

Communities except Galicia, where the management level is considered medium. It is therefore determined that there is no risk of large-scale illegally sourced wood.

The Forestry Law (Law 43/2003 of 21 November on Forests, Law 10/2006 of April 28, and Law 21/2015 of July 20, which modifies Law 43/2003, the Law of Consolidation) gives the Autonomous Communities the powers to manage and control the forests.

Chapter IV - Forest Harvesting establishes that:

- When there is a Management Plan or equivalent in place, or the forest is included within the scope of a PORF (Forest Resources Management Plans), the owner must notify the competent body of the Autonomous Community before harvesting timber.
- In other cases, (where there is no Management Plan or similar in place), administrative authorisation is required before logging.

In the case of public forests managed by the administration (public property), internal approval of the Autonomous Community's Forest Service is required.

Each AC develops its own legislation and models for both public tenders and permits and authorisations for forestry work and harvesting. There are three relevant documents required to verify the legality of the harvesting and compliance with the requirements of the EUTR:

- Notification of work/harvesting (in private forests for works included in the planification of approved Management Plans where the legislation of AC allows)
- Authorisation of work/harvesting (in private forests with no management plan or other extenuating circumstances, according to the legislation of the AC)
- Adjudication of works (in public forests)

Land tenure and land use rights are covered by Spanish legislation and the authorities have implemented tools to register and monitor these rights. These rights have had significant social and economic relevance for centuries, and as a result are widely developed and recognised. Spain scores higher than 50 in Transparency International's corruption perception index, with a score of 57 in 2017, and although the value has fallen since 2012 (value of 65), there are no reports that significantly link corruption with the forestry sector. The level of governance can be categorised as robust. There are no reports of significant conflicts related to the ownership of the forest lands or the legitimacy of their use. In turn, there is legislation that protects land use. Forest lands are classified as rural within the Urban Plans and there is legislation that protects them from different uses.

There are two types of fees to pay for harvesting wood:

1) fees imposed by the Autonomous Communities for the licenses that are required for forestry works/harvesting in private forests. Each AC independently regulates these fees. In public contracts there are payments associated with the contracts that must be made once the work has been contracted and before it is signed.

In any event, having authorisations or contracts issued by public administrations implies that the corresponding fees have been paid.

2) VAT linked to transactions and subsequently, income and/or business tax. The VAT is paid to the Treasury on a quarterly basis and the income and/or business tax on an annual basis.

Integra Fuels has two Chain-of-Custody certifications: FSC (SGSCH-CoC/CW-060189) and PEFC (PEFC/14-31-00293), active since 2016. Due to characteristics of the work performed by Integra Fuels (forestry work and harvesting, chipping and selling the chips, or purchasing of chips for sale), the supply chain is non-existent or

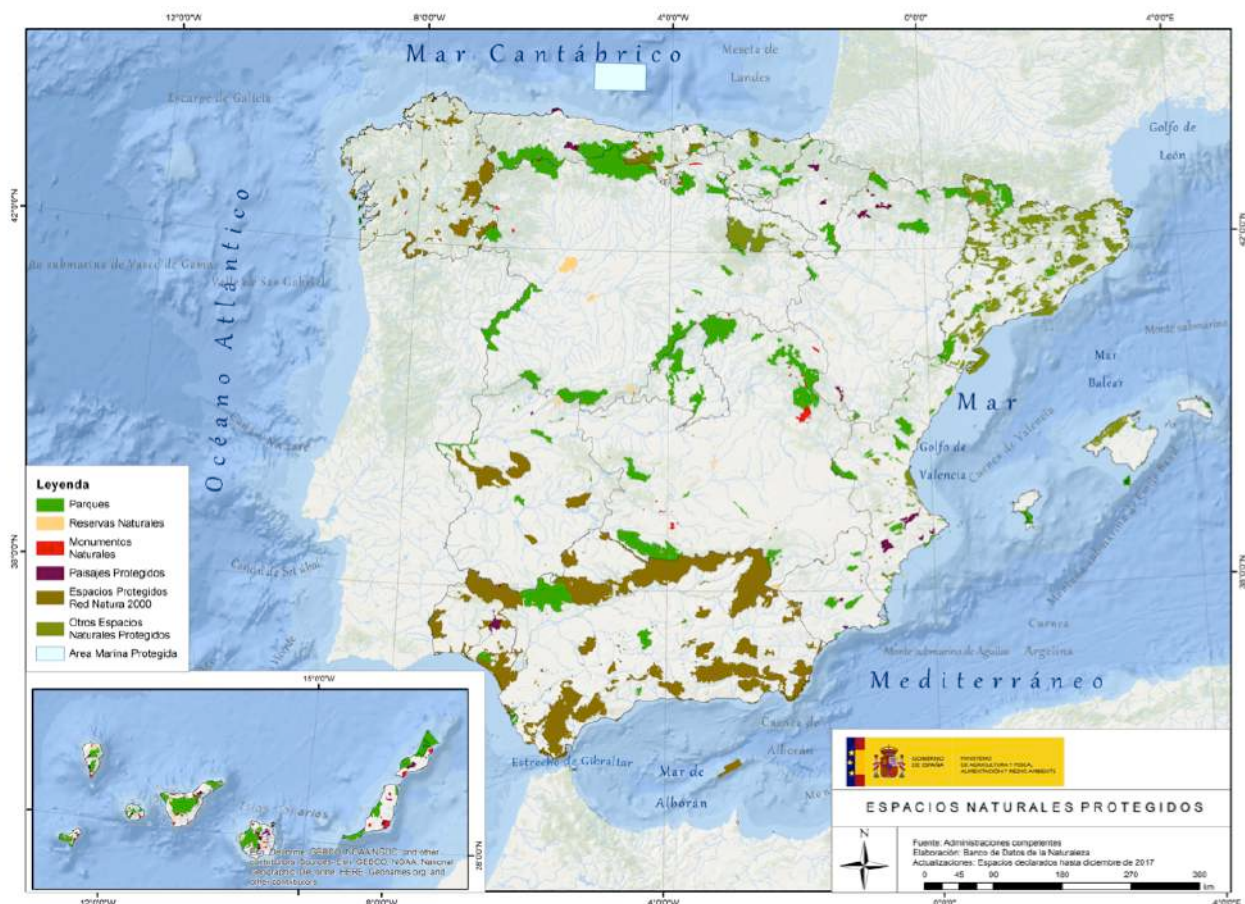
extremely short (a single supplier that does the work and sells the chips to Integra Fuels). In the period audited, 60% of the chips managed were purchased from suppliers and 40% generated by Integra Fuels.

In Spain there is a systematic legal framework for the protection of natural areas and areas with high conservation values: "According to Law 42/2007 on Natural Heritage and Biodiversity, those spaces in the national territory, including protected areas, including inland and marine waters under sovereign or national jurisdiction, including the exclusive economic zone and the continental shelf, that meet at least one of the following requirements and are declared as such:

- Contain natural systems or elements that are representative, fragile, threatened or of special ecological, scientific, scenic, geological or educational interest.
- Be devoted specifically to the protection and maintenance of biological diversity, geodiversity and the associated natural and cultural resources".

There is no forest plant species produced or cultivated in Spain on the list of CITES species. Neither pine nor eucalyptus are within the list of CITES species, Appendices I, II, and III.

There are several figures and denominations, since the majority of the Autonomous Communities have implemented legislation on this issue: National Parks, Natural Parks, Nature Reserves, Natura 2000 Network Areas, Biosphere Reserves. The protected area in Spain is 13% for natural spaces and reaches 28% when including the Natura 2000 Network, with Spain being the country that contributes most to the Natura 2000 Network, the main instrument of Europe's conservation policy. The protected areas cover both public and private forests.



In turn, there are high conservation values linked to cultural property and prehistoric discoveries. The Iberian Peninsula is an area with a large amount of archaeological and prehistoric remains. There is both State and Autonomous Community legislation that protects and catalogues property of historical and cultural value.

The ports of origin act as collection points for chips that are later loaded onto ships and exported. Currently, Integra Fuels has the following storage sites, the majority ports.

Valencian Community:

- CASTELLÓN
- SAGUNTO
- ALICANTE and ALICANTE LOT
- VALENCIA and VALENCIA LOT

Region of Murcia:

- CARTAGENA

Andalusia:

- HUELVA
- CADIZ
- ALMERÍA
- MOTRIL
- MÁLAGA
- ALGECIRAS

The chips are taken directly from the Supply Base to the collection sites in the ports. The port is chosen depending on the distance between the forest and the port in order to optimise transport. Since transport costs are a relevant aspect of profitability, the possibilities of the inclusion of feedstocks not from the Supply Base are reduced. However, there are areas of the AC outside the Supply Base that ship to these ports because of their proximity, particularly in Castellón, Alicante, Cartagena and Huelva. In turn, they can reach the feedstock collection areas of the AC but are excluded from the Supply Base because they fail to fall under the scope, like chips from fruit trees and urban pruning/felling, or chips from feedstock that was not monitored at the source. In these cases, the Chain of Custody procedure will be applied so that the “SBP compliant” feedstock and the “non-SBP compliant” feedstock are separated into clearly identified and different piles.

2.2 Actions taken to promote certification amongst feedstock supplier

As mentioned, Integra Fuels has two Chain of Custody certifications: FSC (SGSCH-CoC/CW-060189) and PEFC (PEFC/14-31-00293), active since 2016. In addition, due to the characteristics of the work performed by Integra Fuels, the supply chain is non-existent or extremely short (a single supplier that performs the work and sells the chips to Integra Fuels).

One of Integra Fuels’ 17 suppliers in the audited period was FSC certified. In another case, a PEFC forest in the Valencian Community was certified and work is now being done there. The Integra Fuels staff maintains direct and constant contact with the suppliers, harnessing the opportunities that arise from promoting supplier certification.

2.3 Final harvest sampling programme

Information has been gathered from Juan Manuel Camacho, Technical Production Director, a forest engineer in charge of making site visits to the worksites, both Integra Fuels' own and those of its suppliers in Levante (Valencian Community and Region of Murcia) and Andalusia to determine if there is any feedstock that comes from final cuts in stands with an over 40-year turnover (pine forests).

According to the information collected, it can be concluded that work in pine forests with regeneration fellings has only been performed in public forests in the Region of Murcia. Thirty percent of the material extracted from these forests are sourced from regeneration fellings. This is a work order for Murcia's public forests that includes a large number of types of work in the stands, one of which is regeneration felling with successive thinning. This represents 5.26% of the total feedstock managed by Integra Fuels within the Supply Base during the period.

Bearing in mind that Integra Fuels sold over 60,000 tons of wood chips for export during this period, only 5.26% of which correspond to final fellings: over 3,000 tons of chips from final fellings, representing approximately 4,000 m³ of roundwood; and that, according to the statistics analysed, 555,368 m³ of roundwood was cut in the three Autonomous Communities in the defined Supply Base in 2012, it can be concluded that the volume from final felling managed by Integra Fuels represents 0.7% of the volume of felling in the Supply Base.

Integra Fuels makes site visits to each worksite where work is outsourced, resulting in clear control of the type of work being performed.

The low-intensity forest management in the three Autonomous Communities in many cases implies that pine forests stands have a management deficit and require significant work to improve their condition, which may include the felling of mature trees.

2.4 Flow diagram of feedstock inputs showing feedstock type [optional]

N/A

2.5 Quantification of the Supply Base

Supply Base

Data from IFN3 (Spanish National Inventory 3) and AC governments, except certification data from FSC and PEFC

- Total Supply Base area (ha): 3.970.000 ha wooded forested area; 6.221.000 ha forested area
- Tenure by type (ha): 2.888.752 ha forested area privately owned / 1.081.248 ha forested area public owned
- Forest by type (ha): 3.970.000 ha wooded forested area temperate; 6.221.000 ha forested area temperate

- d. Forest by management type (ha): 202.100 ha plantation forested area (Eucalyptus Andalucía) / 3.767.900 ha managed natural or natural
- e. Certified forest by scheme (ha):

PEFC Spain: 2.170.441 ha (Andalusia 273.614 ha; Valencian Community 1.212 ha; Murcia 0 ha)

FSC Spain 271.697 ha (Andalusia 145.412 ha; Valencian Community 0 ha; Murcia 0 ha)

Feedstock

- f. Total volume of Feedstock: 0 – 200,000 tonnes (Exact data are shared in auditing, but are not made public due to issues of confidentiality and jurisdiction/competence)
- g. Volume of primary feedstock: 0 – 200,000 tonnes (Exact data are shared in auditing, but are not made public due to issues of confidentiality and jurisdiction)
- h. List percentage of primary feedstock (g), by the following categories. Subdivide by SBP-approved Forest Management Schemes:
 - 0%-19% Certified to an SBP-approved Forest Management Scheme
 - 80%-100% Not certified to an SBP-approved Forest Management Scheme
- i. List all species in primary feedstock, including scientific name:

The company categorises by genus only (Pine/*Pinus*), (Eucalyptus/*Eucalyptus*) since the chips are in no way differentiated at the time of sale.

However, the main species from which the feedstock is sourced are:

- *Pinus halepensis*
- *Pinus pinea*
- *Pinus pinaster*
- *Pinus nigra*
- *Pinus silvestris*
- *Pinus radiata*
- *Eucalyptus globulus*
- *Eucalyptus nitens*
- *Eucalyptus camaldulensis*

- j. Volume of primary feedstock from primary forest: None
- k. List percentage of primary feedstock from primary forest (j), by the following categories. Subdivide by SBP-approved Forest Management Schemes:
 - None Primary feedstock from primary forest certified to an SBP-approved Forest Management Scheme
 - None Primary feedstock from primary forest not certified to an SBP-approved Forest Management Scheme
- l. Volume of secondary feedstock: None.
- m. Volume of tertiary feedstock: None.

- * Compelling justification would be specific evidence that, for example, disclosure of the exact figure would reveal commercially sensitive information that could be used by competitors to gain competitive advantage. State the reasons why the information is commercially sensitive, for example, what competitors would be able to do or determine with knowledge of the information. Bands for (f) and (g) are:
 1. 0 – 200,000 tonnes or m³
 2. 200,000 – 400,000 tonnes or m³

3. 400,000 – 600,000 tonnes or m³
4. 600,000 – 800,000 tonnes or m³
5. 800,000 – 1,000,000 tonnes or m³
6. >1,000, 000 tonnes or m³

Bands for (h), (l) and (m) are:

1. 0%-19%
2. 20%-39%
3. 40%-59%
4. 60%-79%
5. 80%-100%

NB: Percentage values to be calculated as rounded-up integers.

3 Requirement for a Supply Base Evaluation

SBE completed	SBE not completed
X	☐

4 Supply Base Evaluation

4.1 Scope

Integra Fuels defines its scope in primary feedstock within this Supply Base, sourced from forest works/harvesting: pruning, thinning, clearing and/or final felling of species of the *Pinus* and *Eucalyptus* genera. Included in the scope is the transportation of the material from the forest to the port facilities, always in chips as they are processed on-site.

The ports of origin act as collection points for chips that are later loaded onto ships and exported. Currently, Integra Fuels has the following storage sites, the majority ports: CASTELLÓN, SAGUNTO, ALICANTE and the ALICANTE LOT (a lot outside the port area was used until the permit from the port to store chips there was obtained. This permit was recently obtained so the plot is being emptied and it will soon be removed from the scope) in the Valencian Community; CARTAGENA in the Region of Murcia; and HUELVA and CADIZ in Andalusia.

The transfer of ownership can take place at the port of origin in Spain, or at the port of destination, in which case Integra Fuels handles the maritime transport of the material sold.

4.2 Justification

The risk analysis has been approached from the positive perspective that with the type of work and the genera harvested, together with the system implemented by Integra Fuels, the level of forest management existing in Spain, and the level of control of the public administrations, a risk analysis could be conducted under the SBP-defined indicators in the three Autonomous Communities selected with the necessary mitigation measures in designated instances. The majority of the mitigation measures are based on the systems that Integra Fuels has already implemented as part of its certifications and quality system.

4.3 Results of Risk Assessment

Once all the SBP-defined indicators were analysed, the following indicator was designated as the specific risk requiring risk mitigation measures:

- 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).

The remaining indicators were considered low risk.

4.4 Results of Supplier Verification Programme (SVP)

In terms of the supplier verification programme (SVP), it has a solid foundation since Integra Fuels:

- Has a Management and Quality Structure in place, complying with several quality and Chain-of-Custody certifications for sustainable forest management. This means that the company already has a system in place to control its own work and those subcontracted or carried out by its suppliers, which has been used as a basis to which those measures necessary to mitigate risks have been added.
- Has established quality standards for the product it sells: wood chips. This means that a control system is in place for the land used for forestry work, both the work performed by Integra Fuels and

those that are outsourced from suppliers. This preliminary work ensures a high level of confidence in the system.

Therefore, a supplier verification system had already been established and refined to accommodate the risk mitigation measures required by the risk analysis before work was carried out to implement SBP certification. The Integra Fuels system combines supplier verification and the relevant documentation required with the verification of the work required, which truly forms the basis.

The system has been established by developing accreditation for suppliers/forestry work, maintaining the previous requirements set into place by Integra Fuels and adding established site visits and a scale of suppliers/work in order to structure tracking.

4.5 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 Integra Fuels to ensure it is compliant with all SBP requirements for the chips it sells as “SBP-compliant primary feedstock”.

5 Supply Base Evaluation Process

To conduct the risk analysis and implement the SBP-certification process, Integra Fuels assigned Pablo Gómez-Reino Pérez as well as the company's technical team, particularly Juan Manuel Canelo, Licensed in Employee Relations and an Advanced Prevention of Occupational Risks Technician with a specialty in Safety, Hygiene in the Workplace, and Ergonomics and Psychosociology in the Workplace, Director of Quality at Integra Fuels, and Juan Manuel Camacho, Forestry Engineer and Technical Director of Production at Integra Fuels.

Pablo Gómez-Reino Pérez is a Forestry Engineer with extensive experience (18 years) in forest planning, management, and certification. He has worked on processes related to forest certification in the Iberian Peninsula since 2009. He is FSC a forest management and FSC and PEFC Chain of Custody auditor. He has conducted over 70 FSC PEFC Chain of Custody Certification audits as a leading auditor in companies in Spain and Portugal, covering all Chains of Custody possible and all types of companies, from small merchants and printers to large corporations that cover the entire transformation chain, from the forest to the final product. He has also conducted over 20 FSC Forestry Management Audits and Assessments as the leading auditor in Spain and Portugal, leading multidisciplinary teams in FSC forest management evaluations. He received SBP auditor training at in Tallinn (Estonia) in January 2015, which he successfully completed. He has participated in the SBP risk analysis preparation process in Portugal and also provides support to companies in the processes of preparing for certification.

During the consultation process, thirteen stakeholders from the university level, public administrations, Integra Fuels suppliers, and a certification body, were contacted by email in May and June 2018. Some of the answers received had only brief contributions and one was completed in full. All were taken into account for better risk analysis.

Integra Fuels, due to the characteristics of its work and the material it sells (chips), organises site visits by Juan Manuel Camacho to all the places from which material is sourced and supervises the work, creating an ongoing evaluation of suppliers and their work. In addition, as part of its quality system, Integra Fuels (through Juan Manuel Canelo) tracks much of the information required by the various indicators.

6 Stakeholder Consultation

During the consultation process, thirteen stakeholders from the university level, public administrations, Integra Fuels suppliers, and a certification body, were contacted by email in May and June 2018. Some of the answers received had only brief contributions and one was completed in full. All were taken into account in for better risk analysis.

6.1 Response to stakeholder comments

Specific comments made by stakeholders are included here:

Comment 1: I had a quick look at what you sent me, and I think it is a very solid analysis, but I am not a specialist in bioenergy.

Based on my ignorance on these issues, it seems strange to me that there are no market risks associated with the evolution of wood for this purpose or the possible increase/decrease in possible subsidies or existing aid.

Response 1: You're right. There are indicators regarding the sustainability of the fellings and the economic benefit/impact, but there is no reference to assuring the Supply Base and the problems that may exist in this regard.

Comment 2: When it comes to the topic of land area and the distribution of property, I would specifically cite the source of each piece of information and the reference year. Did you conduct an analysis or is it public data?

Response 2: The suggestions mentioned in the comment were incorporated, including the source from public data.

Comment 3: I would go into greater detail in 1.1.2.

Integra Fuels has a management system in which an Excel file (Entries) includes all the information related to purchases, which includes both the source of the material, the supplier and the weight through the weight scale receipts from the trucks that transport the material.

For example, fields in that Excel and how the source can be identified in case of inspection. Physical separation...

Response 3: The commentary has been incorporated, including the most relevant fields of the information provided by the record file.

Comment 4: Do not use English words in the Spanish text: feedstock = materia prima

Response 4: Due to the characteristics of these processes, this is not an easy request. However, "materia prima" has been included wherever possible.

Comment 5: For the EUTR issue you mention that it is FSC certified so the risk is low. Honestly, it doesn't matter if it is FSC certified for export, the SBP certificate is required! Another certification will be requested at this step in the transportation process, another one for unloading, and another one for transport to the plant...If the buyers only buy certified SBP then they can figure it out.

Response 5: The comment is received and we assure you that this is not material sourced from FSC forest management certificates. These are materials controlled by Integra Fuels upon purchase. In this respect, the indicator is of low risk. Obviously, having FSC Chain-of-Custody certification is a relevant supporting document.

Comment 6: This indicator is great, I'm worried about non-forest land, for example, you can't certify the biomass of the afforestation of agricultural land in 2009.

The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not sourced from forests converted to production plantation forest or non-forest lands after January 2008.

Response 6: In this case there was a misunderstanding of the meaning of the indicator. The example given of an agricultural area reforested with European aid can be certified in the future. What the indicator prohibits is the use of feedstock sourced from forests converted into other uses under SBP certification.

On the other hand, and as already mentioned, an exhaustive review has been received from NEPCon, which was used to improve the document in general. A meeting was held with the person who reviewed the document to discuss certain aspects and the most relevant conclusions were reflected in the final version of the risk analysis.

There were no changes in the risk designation proposed in the indicators as a consequence of the consultation process.

7 Overview of Initial Assessment of Risk

Table 1. Overview of results from the risk assessment of all Indicators (prior to SVP)

Indicator	Initial Risk Rating		
	Specified	Low	Unspecified
1.1.1		X	
1.1.2		X	
1.1.3		X	
1.2.1		X	
1.3.1		X	
1.4.1		X	
1.5.1		X	
1.6.1		X	
2.1.1		X	
2.1.2		X	
2.1.3		X	
2.2.1		X	
2.2.2		X	
2.2.3		X	
2.2.4		X	
2.2.5		X	
2.2.6		X	
2.2.7		X	
2.2.8		X	
2.2.9		X	
2.3.1		X	
2.3.2		X	
2.3.3		X	
2.4.1		X	
2.4.2		X	
2.4.3		X	
2.5.1		X	
2.5.2		X	
2.6.1		X	
2.7.1		X	
2.7.2		X	
2.7.3		X	
2.7.4		X	
2.7.5		X	
2.8.1	X		
2.9.1		X	
2.9.2		X	
2.10.1		X	

8 Supplier Verification Programme

8.1 Description of the Supplier Verification Programme

Integra Fuels has both FSC/PEFC Chain-of-Custody certifications, including controlled wood as well as a quality system with several active certifications. Thus, it already had a supplier verification programme prior to the implementation of the SBP certification.

During the audited period, Integra Fuels worked with 17 suppliers that supplied 60% of the chips sold. The other 40% of the chips is obtained by Integra Fuels from the works managed by the company itself.

In terms of the supplier verification programme (SVP), it has a solid foundation since Integra Fuels:

- Has a Management and Quality Structure in place, complying with several quality and Chain-of-Custody certifications for sustainable forest management. This means that the company already has a system in place to control its own work and those subcontracted or carried out by its suppliers, which has been used as a basis to which those measures necessary to mitigate risks have been added.
- Has established quality standards for the product it sells: wood chips. This means that a control system is in place for the land used for forestry work, both the work performed by Integra Fuels and those that are outsourced from suppliers. This preliminary work ensures a high level of confidence in the system.

Therefore, prior to the work carried out to implement the SBP certification, a supplier verification system was established and improved to accommodate the risk mitigation measures required by the risk analysis. The Integra Fuels system combines supplier verification and the relevant documentation required with the verification of the work required, which truly forms the basis.

The system has been established by developing accreditation for suppliers/forestry work, maintaining the previous requirements set into place by Integra Fuels and adding established site visits and a scale of suppliers/work in order to structure tracking.

8.2 Site visits

At the moment, the extended system which was designed has not been put into practice, since it is an evaluation. However, during the evaluation audit it was possible to evaluate all the evidence kept by Integra Fuels from the different information it requests from its suppliers and the work performed, as well as the stakeholders' opinions.

The supplier/forestry work accreditation system was established, involving initial visits to all suppliers with whom Integra Fuels works. This system is designed to be implemented in order to work with approved suppliers from the moment that it earns SBP certification.

8.3 Conclusions from the Supplier Verification Programme

As indicated above, prior to the work carried out to implement the SBP certification, a supplier verification system was established and improved to accommodate the risk mitigation measures required by the risk

analysis. The Integra Fuels system combines supplier verification and the relevant documentation required with the verification of the work required, which truly forms the basis.

In order to mitigate risk, Integra Fuels designed an accreditation/work monitoring system for the companies that work for them in order to evaluate their performance with respect to occupational health and safety in the forestry work they perform. It establishes a system of site visits by Integra Fuels personnel (either the forest manager or those in charge of the zones) with an evaluation by means of a checklist of how the work is performed and the measures for avoiding accidents and impacts. It also establishes a system to communicate noncompliance to companies and a scale with an associated score, so that the lowest-rated companies will be inspected more often than the highest rated.

The system developed is considered complete and suitable for ensuring the use of safety measures and equipment during forestry work.

9 Mitigation Measures

9.1 Mitigation measures

Mitigation measures have been designed to minimise the designated risks and, as such, include all the material within the scope and the Supply Base as “SBP Compliant Biomass”.

These are the mitigation measures designed in the indicator with a designated specified risk.

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).

The risk related to this indicator is classified as:

1. low in public forest works
2. specified in relation to work-related accidents in forest improvement/harvesting works in private forests.

Mitigation measure:

Integra Fuels has an implemented system that covers all the aspects to be taken into account to ensure compliance with the legislation on ORP and Occupational Health and Safety. This system covers both its own workers and its subcontractors and suppliers.

This system ensures that the following minimum amount of information is available for verification:

- Contract with an external prevention service and receipt of payment (COMPANY)
- Civil liability policy and current receipt of payment (COMPANY AND FREELANCE)
- Accident insurance policy and current receipt of payment (COMPANY)
- Appointment of preventive resources, if necessary (COMPANY)
- Photocopies of employees' TC1 or TC2 forms or registry with Social Security (COMPANY)
- Photocopy receipt of Social Security payments (FREELANCE)
- Certificates of Medical Fitness Exam (COMPANY AND FREELANCE)
- Certificates of ORP Training and Information required (COMPANY)
- Certificate of delivery of the necessary EPIs to the workers (COMPANY)
- CE Certificate or compliance with machinery according to Spanish Royal Decree 1215/97 (COMPANY AND FREELANCE)
- Current machinery maintenance record (COMPANY AND FREELANCE)
- Vehicle Inspection Test (IVT in Spain) file (in case of registered machinery) (COMPANY AND FREELANCE)
- Driving license (registered machinery) (COMPANY AND FREELANCE)
- Mandatory vehicle insurance (registered machinery) (COMPANY AND FREELANCE)
- Photocopy of driving license of authorised persons (registered machinery) (COMPANY FREELANCE)
- INTEGRA FUELS, S.L. should be informed immediately in the event of an accident.

In addition, Integra Fuels has developed and implemented a Manual of Good Forest Practices which describe all forestry work, the way to approach the work, the necessary preventive safety measures and what to do in case of accident or emergency. Integra Fuels certifies the training of its workers in this regard. Subcontracted companies and suppliers must have a Manual of Good Forest Practices and provide proof of the implementation or use of Integra Fuels' manual.

Integra Fuels also collects information about work-related accidents that occur on jobs managed by Integra Fuels as well as those of its suppliers, analyses the causes and takes the necessary measures to prevent its recurrence. The system includes the need for field inspection in the case of a systematic increase in work-related accidents in the scope of certification.

Lastly, in order to mitigate risk, Integra Fuels designed an accreditation/work monitoring system for the companies that work for them in order to evaluate their performance with respect to occupational health and safety in the forestry work they perform. It establishes a system of site visits by Integra Fuels personnel (either the forest manager or those in charge of the zones) with an evaluation by means of a checklist of how the work is performed and the measures for avoiding accidents and impacts. It also establishes a system to communicate noncompliance to companies and a scale with an associated score, so that the lowest-rated companies will be inspected more often than the highest rated.

The system developed is considered complete and suitable for ensuring the use of safety measures and equipment during forestry work and mitigate the risks related to work accidents.

9.2 Monitoring and outcomes

As mentioned, Integra Fuels already has a verification system for the works, as well as the documentation required by the work both they and their suppliers performed. The risk mitigation measures developed have been added to this system: supplier/forestry work accreditation system.

This process is continuous and will be evaluated semi-annually (once in the middle of the audit period and another at the end, before the annual audit) in order to ensure that the risk mitigation measures adopted are effective or if improvements or adaptations to the reality of the situation need to be made.

10 Detailed Findings for Indicators

Detailed findings for each Indicator are given in Annex 1.

11 Review of Report

11.1 Peer review

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

11.2 Public or additional reviews

As mentioned, a stakeholder consultation was carried out and their contributions incorporated into the final report. In this regard, the external review by Leticia Calvo Vialettes of NEPCon was the one that contributed the most. In any event, this SBR will remain posted on the Integra Fuels website (<https://integra-fuels.com/certification>) so that comments can be received at any time.

12 Approval of Report

Approval of Supply Base Report by senior management			
Report Prepared by:	<i>Juan Manuel Canelo</i>	<i>Director of Quality at Integra Fuels</i>	<i>28/06/2018</i>
	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:	<i>Juan Manuel Camacho</i>	<i>Technical Director of Production</i>	<i>02/07/2018</i>
	Name	Title	Date
Report approved by:	<i>David Holgado Thornhill</i>	<i>Manager at Integra Fuels</i>	<i>02/07/2018</i>
	Name	Title	Date

13 Updates

13.1 Significant changes in the Supply Base

Not applicable.

13.2 Effectiveness of previous mitigation measures

Not applicable.

13.3 New risk ratings and mitigation measures

Not applicable.

13.4 Actual figures for feedstock over the previous 12 months

Not applicable.

13.5 Projected figures for feedstock over the next 12 months

Not applicable.

Annex 1:

Detailed Findings for Supply Base Evaluation Indicators

	Indicator
1.1.1	The Biomass Producer's Supply Base is defined and mapped.
Finding	Integra Fuel S.L. defines the supply area (Supply Base), covered by this risk analysis as the Autonomous Communities of Andalucía, Murcia and Valencia. These autonomous communities have perfectly defined boundaries and adequate cartography, in terms of their limits and their forests. According to data obtained from the forestry statistics yearbooks of the MAPAMA (<i>Ministry of Agriculture and Fisheries, Food and Environment</i>): <u>Andalucía:</u> - Andalucía has 2,920,000 ha of wooded forest area, out of a total of 4,467,000 ha of forest area. <u>Valencian Community:</u> - The Valencian Community has 748,000 ha of wooded forest area, out of a total of 1,267,000 ha of forest area. <u>Region of Murcia:</u> - The Region of Murcia has 302,000 ha of wooded forest area, out of a total of 487,000 ha of forest area. Within this area Integra Fuels defines its scope in primary feedstock from forest harvesting/works: pruning, thinning, clearing and/or felling of pine and eucalyptus species. The scope includes the transport of the material from the forest to the port facilities, always as wood chip as it is chipped in the forest. Integra Fuels can: - carry out forest harvesting/work directly with its own or subcontracted equipment but under its own responsibility, in which case it has all the information necessary at its disposal about the forest where the work is to be carried out, or - purchase the material from companies that have carried out the work, in which case the following information is collected by Integra Fuels upon purchasing the material:

	➤ all suppliers providing material intended for biomass are required to provide proof of ownership, such as works awards, logging licences and contracts. ➤ a document will be signed (Supply Agreement) which obliges and specifies that "the use and subsequent availability offered by INTEGRA FUELS, S.L. of the material supplied will be carried out in Spain and in compliance with the applicable legislation. ➤ In all cases, before the first purchase, a preliminary check consisting of an internal inspection by the person in charge of the company, will be carried out. The following aspects will be checked: - Forestry documentation: Ownership of the forest, fire protection plan, if applicable, and any other documentation required by the competent authority. - Visit to the forest. The forest will be visited to estimate the amount and type/species of harvestable wood, and the estimated area to be harvested that can be verified on the plans. In both cases, the work may come from: ○ Public tenders, in which case the areas of use are always identified and mapped in the specifications that define the work tenders, ○ Contracts for private forests, in which case a Management Plan may be issued that identifies the work areas or the cadastral reference of the plot(s) in question must be accessed, together with the private contract for carrying out the work. In turn: ○ The corresponding permits from the Autonomous Communities must always be obtained (it is an essential prerequisite for starting the work), which specify the areas of work: Felling permit/authorisation. ○ In both public and private forests, forestry work is subject to the guidelines set out by the Public Authority and is also subject to supervision by personnel from the Public Authority. In Spain cadastral information exists regarding urban and rural properties throughout the whole country. <i>"The Cadastre is an administrative register that comes under the remit of the Ministry of Finance and Public Administration. It contains the description of all rural and urban properties as well as those of special characteristics, which must all be registered, free of charge; these characteristics differentiate it from the Land Registry."</i> All properties are allocated a unique cadastral reference number that allows them to be identified and located. <i>"The cadastral reference number is the official and obligatory identifier of properties. It is an alphanumeric code, consisting of twenty characters, which is assigned by the Cadastre so every property must have its unique cadastral reference number. The cadastral reference number means the properties can be located on the cadastral map."</i> That is why, for those works for which there is no clear, updated information on the work area and its mapping, the cadastral reference number of the plot(s) in question will be used to define and map them through the SigPac (<i>Geographical information system for agricultural plots</i>) of the relevant Autonomous Communities. Based on the foregoing, the risk related to this indicator is classed as low.
Means of Verification	• The area of action is known, and appropriate scale maps are available; • Integra Fuels key personnel demonstrate knowledge of the area of action • One of the following documents must be available: ✓ Allocation specifications of the forest works/harvesting ✓ Approved Management Plan (together with contract) ✓ Cadastral reference number of the plot(s) concerned (together with contract) ✓ Legal tenancy and management rights: felling licences/permits and authorisations.
Evidence Reviewed	Portal of the Cadastre General Directorate: • http://www.catastro.meh.es • https://www1.sedecatastro.gob.es/Cartografia/mapa.aspx MAPAMA: • Ministry: http://www.mapama.gob.es/es/

	- Biodiversity: http://www.mapama.gob.es/es/biodiversidad/temas/ - Forestry statistics: http://www.mapama.gob.es/es/biodiversidad/estadisticas/forestal_anuarios_todos.aspx Junta de Andalucía: - Regional Ministry of Environment and Territorial Planning: http://www.juntadeandalucia.es/medioambiente/site/portalweb - Forestry Service: https://goo.gl/o7bEfQ - Plan Infoca. The Natural Environment of Andalucía: http://www.juntadeandalucia.es/justicia/portal/adriano/.content/recursosexternos/formacion_juecesIIIpresencacioninfoca.pdf Region of Murcia: - Natural Environment: http://www.murcianatural.carm.es/web/guest - Forestry Sector: http://www.murcianatural.carm.es/web/guest/ambito-forestal Valencian Community: - Natural Environment: https://goo.gl/7umhzn - Forests and Woodland: http://www.agroambient.gva.es/es/web/medio-natural/montes - Forestry territory of the Valencian Community: http://www.agroambient.gva.es/web/medio-natural/el-territorio-forestal-de-la-comunitat-valenciana http://mediorural.xunta.gal/institucional/publicacions/forestal/o monte en cifras/ SIGPAC portals: - Mapama: http://sigpac.mapama.gob.es/fega/visor/ - Andalucía: http://ws128.juntadeandalucia.es/agriculturaypesca/sigpac/index.xhtml - Region of Murcia: https://sigpac.carm.es/VisorSigpac2017/# - Valencian Community: http://sigpac.gva.es/visor/
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
1.1.2	Feedstock can be traced back to the defined Supply Base.
Finding	Integra Fuel S.L. defines the supply area (Supply Base), covered by this risk analysis as the Autonomous Communities of Andalucía, Murcia and Valencia. Within this area Integra Fuels defines its scope in primary feedstock from forest harvesting/works: pruning, thinning, clearing and/or felling of pine and eucalyptus species. The scope includes the transport of the material from the forest to the port facilities or sawmills, as trunks, stumps, wood chip or crowns. According to the data provided in indicator 1.1.1. it can be seen that pine appears, in various species, in the 4 autonomous communities, while eucalyptus, also in various species, appears in Andalucía. There is a study carried out by COSE (Spanish Confederation of Forestry Organisations) and published by MAPAMA, 2013, which 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. The study states that there is no risk that undeclared timber extraction will be of significant size. 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 – Consolidation Bill) grants the Autonomous Communities the powers of forest management and control.

	Chapter IV– Forest uses 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. • In other cases, (where there is no Management Plan or similar) administrative authorisation is required before harvesting. In the case of public forests managed by the public authority (public property) internal approval must be given by the Forestry Service of the Autonomous Community. Each Autonomous Community develops its models and processes, with considerable differences existing between them. Consequently, whether Integra Fuels is responsible for the works or has purchased the material from another company responsible for the works, one of the 3 documents listed below will be available, together with the data obtained when the truck enters the collection zone (delivery note, weighing...), in order to ensure that the origin of the raw material is known and can therefore be traced: ▪ Work/harvesting notification ▪ Work/harvesting authorisation (Felling licence) ▪ Allocation of the public forest works contract Integra Fuels has a management system in which an Excel file (Entries) includes all the information related to each of the trucks with raw materials (chips) that arrives at the fields: date, truck details, weights, origin of the material, supplier, distance in Km, and humidity. INTEGRA FUELS, S.L., either in works with the Public Administration (Terms and Conditions, Contracts), or with Private companies (Contracts), specifies the (estimated) amount in tonnes that is expected to be taken from the forest in question. Once the material has been taken to the port facilities for storage, it is weighed on the official port scale. The result is given to both the Administration and the material supplier. Based on the foregoing, the risk related to this indicator is classed as low.
Means of Verification	• Excel file of Entries with information about the origin, species, supplier, carrier; • Delivery note upon entry of the material into port • One of the following documents must be available: ✓ Work/harvesting notification ✓ Work/harvesting authorisation ✓ Allocation of the public forest works contract
Evidence Reviewed	National Risk Assessment Spain 2017: FSC-NRA-ES V1-0 ES 2017-11-09: https://ic.fsc.org/en/document-center/id/150 Study on wood control procedures and risk assessment in each Autonomous Community for the application of the Due Diligence System: https://goo.gl/ZXYiCU Forestry Law: http://www.boe.es/boe/dias/2015/07/21/pdfs/BOE-A-2015-8146.pdf Excel file control record of Integra Fuels. Entries Documentation provided by Integra Fuels on contracts and works allocations
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
1.1.3	The feedstock input profile is described and categorised by the mix of inputs.
Finding	The Integra Fuels management system registers every truck that arrives at the port with the chips from the forest works (direct transport from the forest to the port): type, origin and amount of material transported. It is always checked that each truck that leaves the works area, both public and private, enters the port facilities. This check is carried out by both the Integra Fuels manager, in the field and at the port, and also by the company supplying the material.

	With this data, the raw material profile can be correctly defined according to the requirements of the indicator: ○ Primary feedstock since the transformation is carried out directly in the forest of the different species of pine and eucalyptus. When marketing the chips, Integra Fuels does not identify or separate the species, so the input data only identifies the genus (pine or eucalyptus) in its database. Based on the foregoing, the risk related to this indicator is classed as low.
Means of Verification	• Excel file of Entries with information about the origin, species, supplier, carrier
Evidence Reviewed	Excel file control record of Integra Fuels. Entries
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
1.2.1	The Biomass Producer has implemented appropriate control systems and procedures to ensure that legality of ownership and land use can be demonstrated for the Supply Base.
Finding	In the National Risk Assessment for Spain 2017: FSC-NRA-ES V1-0 ES 2017-11-09 it is established that: <i>“Land tenure and usage rights are covered by Spanish legislation and the authorities have implemented tools to record and monitor land tenure and usage rights. Since the olden days, these rights have been of great social and economic relevance and are therefore widely developed and recognised. Examples of land tenure and usage rights relevant to the Spanish context include, but are not limited to: surveying and marking of public forests, registration and cadastre of property, boundaries (such as property markers) on small private properties, etc.”</i> Spain has a score of above 50 on the Transparency International corruption perceptions index, in 2017 its score was 57, and although the score has fallen since 2012 (score of 65), there are no reports linking corruption significantly to the forestry sector. The level of governance can be categorised as robust, both in terms of the accreditation of ownership and land use. There are no reports of any significant conflicts related to the ownership of forest land or legitimacy for its use. Some small issues or conflicts have been identified, mainly at local level, that are known and can be addressed through legal channels. Examples of these are: ○ Conflicts with easements or public roads. ○ Abandoned land not claimed by descendants (linked to emigration). ○ Proof of unregistered property, old documents or immemorial proof of use. Particularly linked to small property. ○ Different levels of knowledge about the limits of properties. ○ Conflicts with consortiums. There is, in turn, legislation protecting the use of land. Forestry land is classed as rural within the Urban Development Plans and there is legislation in place to protect it from a change of use. Integra Fuels is a legally established company: registered on the Commercial Register of Madrid on 9 March 2007, in volume 5261, book 0, sheet 183, page M-86227, entry 5. In addition, Integra Fuels holds ISO 9001:2015, ISO 14001:2015, OHSAS 18001:2007, and FSC and PEFC Chain of Custody certificates: FSC FSC-C132340 and PEFC PEFC/14-31-00293. Regarding the ownership system of the forests in the 3 Autonomous Communities included in the scope. <u>Andalucía:</u>

	- 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 Junta de Andalucía or the State and the Local Entities. With regard to private forests, the IFN3 (<i>3rd National Forest Inventory</i>) classes the vast majority (3,140,386 hectares) as being of questionable or unknown ownership. However, no reports or news of problems arising from this classification have been found. Up until now Integra Fuels has worked in Murcia in public forests, although it can also work in private forests. <u>Valencian Community:</u> - 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%). The forest land of the Valencian Community is characterised by being dominated by private smallholdings (more than half of the private surface area is made up of holdings of less than 1 ha) which, in addition, are strongly linked and interconnected with agricultural use. <u>Region of Murcia:</u> - 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. Considering what has also been stated in indicator 1.1.2 about the high level of control of public administrations over forest management and planning, we can conclude that the fact that an individual has been granted authorisation to carry out forest work on certain land implies that there is legitimacy in the use of that land. Based on the foregoing, the risk related to this indicator is classed as low.
Means of Verification	- Excel file of Entries with information about the origin, species, supplier, carrier; - One of the following documents must be available: ✓ Work/harvesting notification ✓ Work/harvesting authorisation ✓ Allocation of the public forest works contract - Contract/Allocation with the land owner/manager.
Evidence Reviewed	National Risk Assessment Spain 2017: FSC-NRA-ES V1-0 ES 2017-11-09: https://ic.fsc.org/en/document-center/id/150 Estudio sobre procedimientos de control de madera y evaluación del riesgo en cada Comunidad Autónoma para aplicación del Sistema de Diligencia Debida: https://goo.gl/ZXYiCU Forestry Law: http://www.boe.es/boe/dias/2015/07/21/pdfs/BOE-A-2015-8146.pdf Transparency International, CORRUPTION PERCEPTIONS INDEX 2017: https://www.transparency.org/news/feature/corruption_perceptions_index_2017 MAPAMA: Forestry statistics: http://www.mapama.gob.es/es/biodiversidad/estadisticas/forestal_anuarios_todos.aspx
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
1.3.1	The BP has implemented appropriate control systems and procedures to ensure that feedstock is legally harvested and supplied and is in compliance with EUTR legality requirements.
Findings	There is a study carried out by COSE (Spanish Confederation of Forestry Organisations) and published by MAPAMA, 2013, which 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. The study states that there is no risk that undeclared timber extraction will be of significant size. The study concludes that the Spanish regulations and the monitoring procedures carried out by the Autonomous Communities are consistent and guarantee the legality of wood harvesting. Each Autonomous Community develops its own legislation and models for each case, both for public tenders and for permits and authorisations for forestry works and harvesting. Documentación ▶ Solicitud según modelo normalizado ▶ Plano Plano de situación catastral o del recinto SIGPAC que indique la zona de actuación. ▶ Declaración responsable Solamente para el aprovechamiento de la madera. La declaración responsable se enviará, por correo electrónico, a siguiente dirección: politicaforestal@carm.es ▶ Justificante del pago de la tasa Solamente en el caso de aprovechamiento de madera y leñas, una vez comprobada la viabilidad del aprovechamiento por los técnicos se deberá abonar la tasa previamente a la resolución del procedimiento. In this respect, therefore, whether Integra Fuels is responsible for the works or has purchased the material from another company responsible for the works, one of these 3 documents will be available to verify the legality of the use and compliance with EUTR requirements: ▪ Work/harvesting notification ▪ Work/harvesting authorisation ▪ Allocation of public forest works contract Integra Fuels has a management system whereby the necessary information is documented for each of the works through the Controlled Material Supply procedure in its FSC Chain of Custody certification (e.g. environmental requirements model, which is sent to be signed by all the suppliers and specifies the requested information, including the material purchase contract and the necessary permits). Based on the foregoing, the risk related to this indicator is classed as low.
Means of Verification	• Integra Fuels records of each job including the Controlled Material Supply procedure in its FSC Chain of Custody Certification • One of the following documents must be available: ✓ Work/harvesting notification ✓ Work/harvesting authorisation ✓ Allocation of public forest works contract
Evidence Reviewed	National Risk Assessment Spain 2017: FSC-NRA-ES V1-0 ES 2017-11-09: https://ic.fsc.org/en/document-center/id/150 Study on wood control procedures and risk assessment in each Autonomous Community for the application of the Due Diligence System: https://goo.gl/ZXYiCU Andalucía, Authorisation application form. felling trees and/or canes: http://www.juntadeandalucia.es/medioambiente/portal_web/administracion_electronica/Tramites/Agua/Autorizaciones/Autorizaciones/Modelos/corte_arboles_canas.pdf Valencian Community, Forestry harvesting application forms for the Valencian Community: http://www.agroambient.gva.es/web/medio-natural/aprovechamientos-forestales3

	Region of Murcia, Authorisation for the use of forestry species on private properties: https://www.carm.es/web/pagina?IDCONTENIDO=5481&IDTIPO=240&RASTRO=c672\$m2469
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

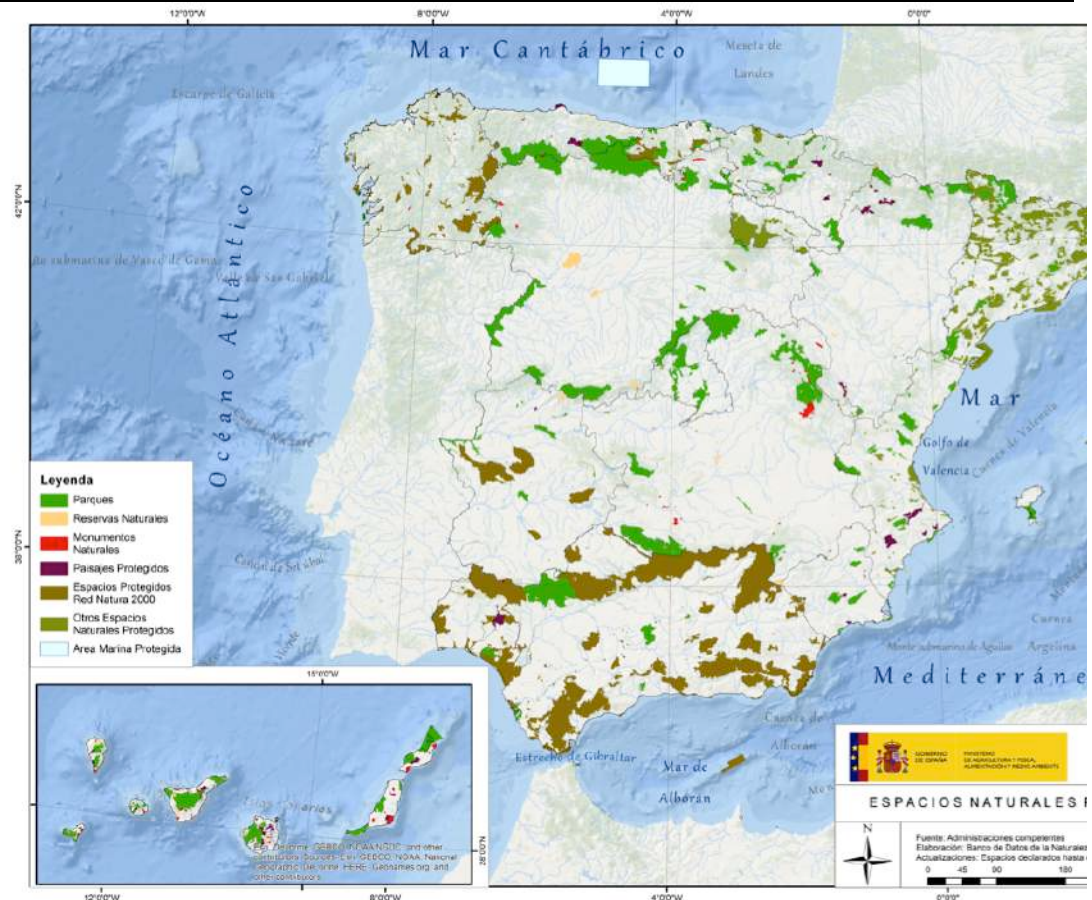
	Indicator
1.4.1	The Biomass Producer has implemented appropriate control systems and procedures to verify that payments for harvest rights and timber, including duties, relevant royalties and taxes related to timber harvesting, are complete and up to date.
Finding	There are two types of fees payable for timber harvesting: 1) fees imposed by the Autonomous Communities in the licences required for the works/harvesting in private forests. Each Autonomous Community regulates this aspect independently. If fees are applicable, authorisation will only be issued after the fees have been paid. In public contracts, there are payments associated with the contract allocation that must be met once the work has been awarded and before it is finally formalised. In all cases the fact of having authorisations or allocations issued by public administrations implies that the corresponding fees have been paid. Therefore, payment of the corresponding fees is certified by holding the following: ▪ Work/harvesting notification ▪ Work/harvesting authorisation ▪ Allocation of public forest works contract 2) VAT linked to transactions and then income tax and/or corporation tax. VAT is paid to the Tax Authorities on a quarterly basis and income tax and/or corporation tax is paid annually. The payment of taxes to the Tax Authorities relating to the purchase of source material is credited through: a) invoice or valid receipt for the purchase of raw material required for the feedstock or the work carried out (bearing in mind that many times self-billing is applied, so it is the purchasing company itself that issues the invoice) b) certificate of being up to date with payments to the Tax Authorities (of the state and the autonomous community) of the company that has purchased the material or carried out the work. Based on the foregoing, the risk related to this indicator is classed as low.
Means of Verification	• Invoices/valid receipts (bearing in mind that many times self-billing is applied, so it is the purchasing company itself that issues the invoice) • Certificate of being up to date with payments to the Tax Authorities, of the state and the autonomous community. • One of the following documents must be available: ✓ Work/harvesting notification ✓ Work/harvesting authorisation ✓ Allocation of public forest works contract
Evidence Reviewed	Tax Authority VAT Basic Regulations: https://goo.gl/riom9a Tax Authority IRPF (<i>Income Tax</i>) Basic Regulations: https://goo.gl/95xiX1 Tax Authority Corporation Tax Basic Regulations: https://goo.gl/c7JK7o
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
1.5.1	The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is supplied in compliance with the requirements of CITES.
Finding	The list of CITES species does not include any forest plants produced or grown in Spain. Neither pine or eucalyptus are among the CITES species, Appendix I, II or III. Based on the foregoing, the risk related to this indicator is classed as low.
Means of Verification	List of species included in the raw material.
Evidence Reviewed	Check list of CITES species: http://checklist.cites.org/#/en Portal of the CITES administrative authority in Spain: http://www.cites.es/es-ES/Paginas/default.aspx Applicable CITES legislation: http://www.cites.es/es-ES/legislacion/Paginas/Legislacion-de-aplicacion.aspx
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
1.6.1	The Biomass Producer has implemented appropriate control systems and procedures to ensure that feedstock is not sourced from areas where there are violations of traditional or civil rights.
Finding	There is no armed conflict in Spain, nor is the Spanish forestry sector associated with any conflict. Spain is not subject to any UN sanction or ban on timber exports, and there are no persons or entities in the Spanish forestry sector that are sanctioned by the UN. Spain is well ranked in international reports: - Corruption Perceptions Index score of 57. The perception of the level of corruption has increased significantly in Spain in recent years, although it remains clearly above 50, which implies a relatively low level of perception; - World Bank Governance Indicators (WGI), scores for 2017 between 61.90 and 83.17 (1-100 points). The WBI report has been produced in 200 countries since 1996 and covers the following governance indicators: i) Voice and Accountability, ii) Political Stability and Absence of Violence/Terrorism, iii) Government Effectiveness, iv) Regulatory Quality, v) Rule of Law, and vi) Control of Corruption. Although there are some concerns regarding civil rights in Spain reflected in reports from international organisations such as Amnesty International (see the 2017 report of Spain), none of these concerns are directly related to the forestry sector. Spain does not appear in any report from international organisations (Global Witness; Chatham House Illegal Logging portal) regarding illegal timber trade or harvesting. There are no indigenous peoples in Spain who can claim traditional use of lands, forests or other resources on the basis of customary rights or traditional uses. In Spain there are many ancient customary rights linked to the forests of the Iberian Peninsula. There are no relevant conflicts related to these rights and where they exist there are established channels for their management and resolution. Many of these uses have died out due to disuse or they simply exist, but are not exercised and others have been integrated into the management of the forests (public roads, firewood, communal management...). An example of these uses is the Communal Forests, both Roman and Germanic, which have been gradually recovered since the establishment of democracy in 1977. Where communities have been able to demonstrate common use by local residents, they have been declared Neighbourhood Forests. There are Neighbourhood Forest Boards and legislation to regulate their activity. 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. Labour rights are observed including those specified in the ILO fundamental principles. Spain has ratified the 8 ILO Fundamental Conventions. Based on the foregoing, the risk related to this indicator is classed as low.
Means of Verification	• If there are any traditional rights to the land belonging to local peoples, these are identified. • There are clear procedures and channels in place to resolve any possible conflicts regarding the traditional rights to the land belonging to local peoples.
Evidence Reviewed	National Risk Assessment Spain 2017: FSC-NRA-ES V1-0 ES 2017-11-09 WGI: http://info.worldbank.org/governance/WGI/#reports Transparency International, CORRUPTION PERCEPTIONS INDEX 2017: https://www.transparency.org/news/feature/corruption_perceptions_index_2017 Amnesty International Spain: https://www.es.amnesty.org/en-que-estamos/espana/ Illegal Logging portal: https://www.illegal-logging.info/regions/spain Global Witness: https://www.globalwitness.org/en/ ILO Spain: http://www.ilo.org/madrid/oit-en-españa/lang--es/index.htm ILO Conventions: http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--es/index.htm Spanish Employment and Social Security Legislation: https://www.boe.es/legislacion/codigos/codigo.php?id=93&modo=1&nota=0&tab=2
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.1.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that forests and other areas with high conservation values are identified and mapped.
Finding	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, Protected Natural Spaces are considered to be those areas of the national territory, including continental waters and maritime waters under national sovereignty or jurisdiction, including the exclusive economic zone and the continental shelf, 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. ▪ Be especially dedicated to the protection and maintenance of biological diversity, geodiversity and associated natural and cultural resources." There are many types and names, since most of the Autonomous Communities have legislated on this issue: National Parks, Natural Parks, Nature Reserves, Natura 2000 Network Areas, Biosphere Reserves. 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.



There is a good level of governance and a comprehensive legal framework developed for Spanish protected areas, and a good level of control exercised by the Autonomous Communities, that are the competent authorities. Any harvesting activity that may affect rare or endangered species has limitations specified in the harvesting permit. In turn, the Autonomous Communities have a wealth of information both on websites and in viewers and geographic information (GIS) on protected areas and priority ecosystems, habitat.

There are also high conservation values linked to cultural assets and prehistoric finds. The Iberian Peninsula is an area with a large amount of archaeological and prehistoric remains. There is both national and Autonomous Community legislation that protects and catalogues sites of historical and cultural interest. In the Autonomous Communities that require prior authorisation, this already includes any lien on a site of cultural interest and the measures or restrictions necessary regarding the work. In the case of prior communications, if the area is affected by an asset of this nature, it is necessary to obtain the relevant Heritage authorisation. The operating procedure is also legislated in the event that remains are found during the work. In these cases, the work must be stopped and the findings reported to the competent authority.

There is a good level of governance and a comprehensive legal framework developed for Spanish protected areas, and a good level of control exercised by the Autonomous Communities, that are the competent authorities.

Therefore, the following operational guide is established with regards the identification and delimitation of high conservation values:

- For works in public forests, the management services of the Autonomous Community have all the information necessary for their identification and mapping. Any limitation to the related management is specified in the actual allocation.
- For work on private estates in the Autonomous Communities of Valencia, Andalucía and Murcia that require prior authorisation to carry out any forestry work/harvesting, the management services of the Autonomous Communities themselves will carry out the work of identifying and delimiting the attributes of high conservation value

	in such a way that their presence and the subsequent management limitations are reflected in the authorisation they issue. Based on the foregoing, the risk related to this indicator is classed as low in the defined scope, forestry work/harvesting in the Autonomous Communities of Andalucía, Valencia and Murcia.
Means of Verification	- 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 - Forestry work/harvesting authorisation - Necessary permits - Catalogue of sites of cultural interest. GIS viewers - Technical Specifications for the allocation of the public forest works contract
Evidence Reviewed	Law 42/2007 on Natural Heritage and Biodiversity: http://www.boe.es/diario_boe/txt.php?id=BOE-A-2007-21490 MAPAMA: - Protected areas Spain: http://www.mapama.gob.es/es/biodiversidad/temas/espacios-protegidos/espacios-naturales-protegidos/ - Map of protected areas Spain: http://www.mapama.gob.es/es/biodiversidad/servicios/banco-datos-naturaleza/enp_2017_tcm30-195782.pdf - National Parks GIS layers: http://www.mapama.gob.es/es/red-parques-nacionales/sig/ Law 16/1985, of 25 June, on Spanish Historical Heritage: https://www.boe.es/buscar/pdf/1985/BOE-A-1985-12534-consolidado.pdf Junta de Andalucía: - Network of Protected Areas of Andalucía (RENPA): http://www.juntadeandalucia.es/medioambiente/site/portalweb/menuitem.f497978fb79f8c757163ed105510e1ca/?vgnnextoid=007fee9b421f4310VgnVCM2000000624e50aRCRD&vgnnextchannel=3bdd61ea5c0f4310VgnVCM1000001325e50aRCRD - Natura 2000 Network: http://www.juntadeandalucia.es/medioambiente/site/portalweb/menuitem.f497978fb79f8c757163ed105510e1ca/?vgnnextoid=d2d5f92658274410VgnVCM1000001325e50aRCRD&vgnnextchannel=d0e77b32b31f4310VgnVCM1000001325e50aRCRD - RENPA viewer: http://www.juntadeandalucia.es/medioambiente/site/rediam/menuitem.04dc44281e5d53cf8ca78ca731525ea0/?vgnnextoid=b2460c33f6959210VgnVCM1000001325e50aRCRD& - Natura 2000 Network viewer (SCIs, SPAs and SACs) in Andalucía: http://www.juntadeandalucia.es/medioambiente/site/rediam/menuitem.04dc44281e5d53cf8ca78ca731525ea0/?vgnnextoid=cf7b1cab5bf59210VgnVCM1000001325e50aRCRD&vgnnextchannel=66ffdb27eb364410VgnVCM1000001325e50aRCRD&vgnnextfmt=rediam&lr=lang_es - Environmental Information downloads: http://www.juntadeandalucia.es/medioambiente/site/rediam/menuitem.aedc2250f6db83cf8ca78ca731525ea0/?vgnnextoid=7b3ba7215670f210VgnVCM1000001325e50aRCRD&lr=lang_es Valencian Community: - Protected Natural Areas: http://www.agroambient.gva.es/es/web/medio-natural/espacios-naturales-protegidos - Natura 2000 Network: http://www.agroambient.gva.es/web/natura-2000 - Mapping viewer of the Valencian Community: http://visor.gva.es/visor/

	Region of Murcia: - Protected Natural Areas of the Region of Murcia: http://www.murcianatural.carm.es/web/guest/espacios-naturales-protegidos - OISMA mapping viewer: https://geoportal.imida.es/oisma/ Wikipedia protected natural areas Spain: https://es.wikipedia.org/wiki/Anexo:Espacios_naturales_protegidos_de_España Europarc 2016 yearbook on the state of protected areas in Spain: http://www.redeuroparc.org/system/files/shared/Publicaciones/Anuario_2016/anuario_2016_europarc-espana.pdf National Risk Assessment Spain 2017: FSC-NRA-ES V1-0 ES 2017-11-09: https://ic.fsc.org/en/document-center/id/150
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.1.2	The Biomass Producer 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.
Finding	From the description given in the previous indicator, it can be concluded that there is an effective real framework that allows for the identification and mapping of the high conservation values present. In turn, the aforementioned report produced by COSE and published by MAPAMA indicates 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. The study concludes that the Spanish regulations and surveillance procedures carried out by the Autonomous Communities are consistent. The Autonomous Communities have their own personnel to carry out the control over the high conservation values, Forestry/Environmental Agents. 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. In all cases there is a clear legal framework and effective control by the authorities of any potential threats to the high conservation values. With the information above, the following operation guide has been established with regards identifying and addressing potential threats to high conservation values: 1. For works in public forests, the management services of the Autonomous Community have all the information necessary at their disposal, which will be reflected in the work specifications. Any management limitations related to potential threats to high values are specified in the actual allocation. 2. For work on private estates in the Autonomous Communities of Valencia, Andalucía and Murcia that require prior authorisation to carry out any forestry work/harvesting, the management services of the Autonomous Communities themselves will carry out the work of identifying possible threats to the high conservation values in such a way that their presence and the subsequent management limitations are reflected in the authorisation they issue. 3. For work not carried out under the responsibility of Integra Fuels (work carried out by subcontractors is considered to be under the responsibility of Integra Fuels), i.e., where Integra Fuels buys the chips, procedures are in place to determine the origin of the raw material and the relevant information on the work is always requested; contract, felling licence, authorisations... The level of control by the Autonomous Communities is maintained. In turn, and given that the control of the work is not directly under the supervision of Integra Fuels, the company provides its suppliers with clear operating instructions in the event of identifying possible threats to high conservation values and therefore prevents possible threats to the environment or particularly sensitive areas.

	Based on the foregoing, the risk related to this indicator is classed as low in the defined scope, forestry work/harvesting in the Autonomous Communities of Andalucía, Valencia and Murcia.
Means of Verification	- 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 - Forestry work/harvesting authorisation - Technical Specifications for the allocation of the public forest works contract - Good environmental practices manual in Sustainable Forest Management. - Results of the verification audits of Integra Fuels
Evidence Reviewed	Law 42/2007 on Natural Heritage and Biodiversity: http://www.boe.es/diario_boe/txt.php?id=BOE-A-2007-21490 MAPAMA: - Protected areas Spain: http://www.mapama.gob.es/es/biodiversidad/temas/espacios-protegidos/espacios-naturales-protegidos/ - Map of protected areas Spain: http://www.mapama.gob.es/es/biodiversidad/servicios/banco-datos-naturaleza/enp_2017_tcm30-195782.pdf - National Parks GIS layers: http://www.mapama.gob.es/es/red-parques-nacionales/sig/ Junta de Andalucía: - Network of Protected Areas of Andalucía (RENPA): http://www.juntadeandalucia.es/medioambiente/site/portalweb/menuitem.f497978fb79f8c757163ed105510e1ca/?vgnextoid=007fee9b421f4310VgnVCM2000000624e50aRCRD&vgnnextchannel=3bdd61ea5c0f4310VgnVCM1000001325e50aRCRD - Natura 2000 Network: http://www.juntadeandalucia.es/medioambiente/site/portalweb/menuitem.f497978fb79f8c757163ed105510e1ca/?vgnextoid=d2d5f92658274410VgnVCM1000001325e50aRCRD&vgnnextchannel=d0e77b32b31f4310VgnVCM1000001325e50aRCRD - RENPA viewer: http://www.juntadeandalucia.es/medioambiente/site/rediam/menuitem.04dc44281e5d53cf8ca78ca731525ea0/?vgnextoid=b2460c33f6959210VgnVCM1000001325e50aRCRD& - Natura 2000 Network viewer (SCIs, SPAs and SACs) in Andalucía: http://www.juntadeandalucia.es/medioambiente/site/rediam/menuitem.04dc44281e5d53cf8ca78ca731525ea0/?vgnextoid=cf7b1cab5bf59210VgnVCM1000001325e50aRCRD&vgnnextchannel=66ffdb27eb364410VgnVCM1000001325e50aRCRD&vgnnextfmt=rediam&lr=lang_es - Environmental Information downloads: http://www.juntadeandalucia.es/medioambiente/site/rediam/menuitem.aedc2250f6db83cf8ca78ca731525ea0/?vgnextoid=7b3ba7215670f210VgnVCM1000001325e50aRCRD&lr=lang_es Valencian Community: - Protected Natural Areas: http://www.agroambient.gva.es/es/web/medio-natural/espacios-naturales-protegidos - Natura 2000 Network: http://www.agroambient.gva.es/web/natura-2000 - Mapping viewer of the Valencian Community: http://visor.gva.es/visor/ Region of Murcia: - Protected Natural Areas of the Region of Murcia: http://www.murcianatural.carm.es/web/guest/espacios-naturales-protegidos - OISMA Mapping viewer: https://geoportal.imida.es/oisma/

	Europarc 2016 yearbook on the state of protected areas in Spain: http://www.redeuroparc.org/system/files/shared/Publicaciones/Anuario_2016/anuario_2016_europarc-espana.pdf National Risk Assessment Spain 2017: FSC-NRA-ES V1-0 ES 2017-11-09: https://ic.fsc.org/en/document-center/id/150 Study on wood control procedures and risk assessment in each Autonomous Community for the application of the Due Diligence System: https://goo.gl/ZXYiCU
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.1.3	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not sourced from forests converted to production plantation forest or non-forest lands after January 2008.
Finding	<u>Conversion from forest to plantation:</u> This is a situation (the felling of native species and the planting of fast-growing species under intensive management) that may, theoretically, occur within the scope of this Supply Base on private properties in Andalucía (eucalyptus). The raw material that is going to be used as SBP compliant does not include material coming from conversions of autochthonous masses to eucalyptus plantations, Integra Fuels will carry out in the works of exploitation of private plots in Galicia a check of orthophotos prior to 2008 to corroborate that the It was not populated by a mass of hardwood native consolidated. <u>Andalucía:</u> The Junta de Andalucía includes eucalyptus as an invasive alien 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 occupied by eucalyptus plantations. Since that year, eucalyptus has not been used in reforestation in public forests and thousands of hectares of eucalyptus trees have been recovered in public forests in Andalucía. In addition, the area of eucalyptus trees in the province of Huelva, the area with the largest plantations, has been reduced since 1989 from 234,000 ha to 140,000. Furthermore, the Huelva pulp mill, the first destination for the wood of this species, has closed. If we add to all this the high level of control over operations in the natural environments of the Junta de Andalucía, we can rule out the existence of transformations of relevant substitution of native species with eucalyptus since 2008 in Andalucía. <u>Change from forest to non-forest use.</u> The authorisation of changes in forest use is regulated at state level by 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: "<i>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.</i>" Article 6 of this Law also defines the concept of change in forest use as: "<i>any material action of administrative act that causes the forest to lose its character as such</i>". Therefore, this is an exceptional situation that requires the express authorisation of the competent authorities. Normally, the change to agricultural use can be authorised in those areas that have had a previous agricultural use, in a period of 10-30 years. For other types of changes, they are only authorised in the case of special public interest.

	This is something that does not affect the type of forest, consolidated arboreal masses, in which Integra Fuels works. In addition, Integra Fuels has not worked on any clearcutting operations, which will be the practice linked to this type of conversion. Even so, it should be noted that the material from felling carried out for conversions from forest to non-forest use, cannot be included in the SBP feedstock. <u>Andalucía:</u> In the regulation of Andalucía, changes of use are regulated by Law 2/1992, of 15 June, Forestry of Andalucía, which states in article 69: “<i>The change of use of forest land for agricultural crops or other forest crops shall require authorisation from the Forestry Administration, regardless of the ownership situation of the land, without prejudice to other required authorisations or licences</i>”. public information is available on the transformations that have been authorised by province since 2006 (http://www.juntadeandalucia.es/medioambiente/site/porta/web/menuitem.7e1cf46ddf59bb227a9ebe205510e1ca/?vgnextoid=e8a36e8366862510VgnVCM2000000624e50aRCRD&vgnnextchannel=8b0b6e8366862510VgnVCM2000000624e50aRCRD) <u>Valencian Community:</u> In turn, in the Valencian Community, changes in use from forestry to agriculture must be authorised by the Directorate General for the Natural Environment. Public information is available on the authorised transformations with an area of 1200 ha (http://www.agroambient.gva.es/es/web/medio-natural/cartografia-forestal). <u>Murcia:</u> In the same way in Murcia, the clearing of forest land, outside protected natural areas, for agricultural use requires approval from the Directorate General for the Natural Environment. There is a specific application form for this (https://www.carm.es/web/pagina?IDCONTENIDO=7122&IDTIPO=240&TASAS=S&RASTRO=c672\$m2469#informacionTasas). It is therefore concluded that there is a clear legal framework that regulates both the transformation of native vegetation into plantations (prohibition), and the transformation of forest land into non-forest land (prior authorisation). Based on the foregoing, the risk related to this indicator is classed as low for forestry work/harvesting in public tender contracts and in private forests in the Autonomous Communities of Andalucía, Valencia and Murcia.
Means of Verification	• Review of orthophotos from flights prior to 2008. • Existing legal framework. Laws, regulations and control bodies • Forestry work/harvesting authorisation • Cartography available and consultation with the competent bodies of the Autonomous Communities regarding transformations • Management Plan, development project • Signed agreements and contracts
Evidence Reviewed	Forestry Law consolidated text (Forestry Law 43/2003 amended by Laws 10/2006, of 28 April and 21/2015, of 20 July): https://www.boe.es/buscar/act.php?id=BOE-A-2003-21339 Law 2/1992, of 15 June, Forestry law of Andalucía: https://www.boe.es/buscar/act.php?id=BOE-A-1992-15996 Removal of eucalyptus trees in public forests, Junta de Andalucía: http://www.juntadeandalucia.es/medioambiente/site/porta/web/menuitem.7e1cf46ddf59bb227a9ebe205510e1ca/?vgnextoid=4cb4453f8678a210VgnVCM2000000624e50aRCRD&vgnnextchannel=c192af8569fb5310VgnVCM2000000624e50aRCRD Law 5/2014, of 25 July, of the Generalitat, on Land Use Planning, Urban Planning and Landscape, of the Valencian Community, consolidated text: https://www.boe.es/buscar/pdf/2014/BOE-A-2014-9625-consolidado.pdf

	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 Cartography and database of agricultural transformations of forest areas of the Valencian Community http://www.agroambient.gva.es/documents/20551003/162281880/Manual+cartograf%C3%ADa+Transformaciones_V9+Junio+2017.pdf/4c435927-8743-43e1-aace-db6a4ee083f8 Law 8/2014 on Tax Measures, Administrative Simplification and Civil Service, Region of Murcia: https://www.boe.es/boe/dias/2014/12/23/pdfs/BOE-A-2014-13369.pdf http://lospiesenlatierra.laverdad.es/blog/3337-100000-euros-por-roturar-un-monte-en-totana.html
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.2.1	The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them.
Finding	According to the legislation in force, at both national and regional level, forestry activities with certain characteristics and of a certain size, must have an environmental impact report prior to applying for a licence (opening of tracks, reforestation of a certain entity...). The environmental impacts of harvesting activities on the land or watercourses are well regulated in Spanish legislation. The Autonomous Communities have their own personnel to carry out the control tasks. 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. In addition, Integra Fuels has 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 Integra Fuels buys chips from other suppliers, and therefore the work in the forest is not under its control, under contract it obliges the supplier to provide its Manual of Good Environmental and Forestry Practices and to follow it and implement it in the work to be carried out. Based on the foregoing, the risk related to this indicator is classed as low.
Means of Verification	• Existing legal framework. Laws, regulations and control bodies. • Technical specifications for the award of the contract for work in public forests • Action project, if applicable • Environmental assessment report, if available • Manual of good environmental practices • Manual of good forestry practices • Contracts with suppliers • Information received from suppliers on the environmental assessment of the work • Assessment of potential impacts at site level. • Assessment of measures taken to minimise impacts • Monitoring results
Evidence Reviewed	Environmental Assessment legislation: http://www.mapama.gob.es/es/calidad-y-evaluacion-ambiental/temas/evaluacion-ambiental/legislacion/ Law 21/2013 on Environmental Assessment: http://www.mapama.gob.es/es/calidad-y-evaluacion-ambiental/temas/evaluacion-ambiental/Ley%20%2021%202013%20de%20Evaluacion%20Ambiental_tcm30-190698.pdf

	Guides and directives for environmental assessment: http://www.mapama.gob.es/es/calidad-y-evaluacion-ambiental/temas/evaluacion-ambiental/guias-directrices/ Spanish Association of Environmental Assessment: - Spanish association of environmental impact assessment http://www.eia.es - National legislation: http://www.eia.es/nacional/ - Autonomous Community legislation: http://www.eia.es/autonomica/
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.2.2	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b).
Finding	The biggest problem facing Spanish soils is desertification. Soil erosion is one of the determining factors in the progress of desertification in Spain and constitutes an environmental problem of special relevance in most of the Mediterranean area. According to the Map of Erosive Soil States (1987-2001) which uses the USLE_USDA methodology, the soil formation process reaches a variable rate of between 2 and 12 tonnes per hectare per year. However, 24% of the national territory (12,382,984 ha) loses more than 12 tonnes per hectare per year and 12.3% (6,217,830 ha) at a rate of more than 50 tonnes per hectare per year. These six million hectares with severe erosive processes are mostly located within the hydrographic basins of the Mediterranean-continental climate, mainly in the basins of the South, Guadalquivir, Ebro, Tagus and Júcar. The annual soil loss in Spain is deemed to be more than 1,200 million tonnes. 27% of these losses occur in forest areas (334 million tonnes), and the remainder occur within agricultural land (887 million tonnes). Given that forest use exceeds agricultural use in terms of area, it is clear that the highest unit rates of erosion occur in areas used for agricultural crops. In the forestry sector, the greatest loss of soil occurs in the area occupied by shrubs and bushes (19.1 tonnes per hectare per year) and in wasteland, areas with scattered scrub and sparsely wooded areas (FCC<20%), with an average of 17.5 tonnes per hectare per year. Integra Fuels carries out work to improve forest cover or forest use. According to the information above, it can be established that forestry work does not damage the soil significantly and that, within the framework of sustained forest management and with appropriate environmental and forest management procedures, no significant damage to the soil is to be expected. In addition, the areas most affected by soil loss (Mediterranean area) are those where the level of control by the competent administrations is highest. Based on the foregoing, the risk related to this indicator is classed as low.
Means of Verification	- Existing legal framework. Laws, regulations and control bodies - Available maps on the risk of erosion and desertification - Code of Good Environmental Practices - Good Environmental Practices in Sustainable Forest Management
Evidence Reviewed	Forestry Law consolidated text (Forestry Law 43/2003 amended by Laws 10/2006, of 28 April and 21/2015, of 20 July): https://www.boe.es/buscar/act.php?id=BOE-A-2003-21339 Law 2/1992, of 15 June, Forestry law of Andalucía: https://www.boe.es/buscar/act.php?id=BOE-A-1992-15996 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 MAPAMA: National Inventory of Soil Erosion (INES): http://www.mapama.gob.es/es/desarrollo-rural/temas/politica-forestal/inventario-cartografia/inventario-nacional-erosion-suelos/

	MAPAMA, National Action Programme against Desertification (PAND): http://www.mapama.gob.es/es/desarrollo-rural/temas/politica-forestal/desertificacion-restauracion-forestal/lucha-contra-la-desertificacion/lch_pand_descargas.aspx Spanish Society of Forest Sciences: - Report on the situation of forests and the forestry sector in Spain 2013 (ISFE) (http://secforestales.org/content/informe-isfe) - ISFE 2017 Progress Report
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.2.3	The Biomass Producer has implemented appropriate control systems and procedures to ensure that key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).
Finding	As stated in indicators 2.1.1. and 2.1.2., 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, Protected Natural Spaces are considered to be those areas of the national territory, including continental waters and maritime waters under national sovereignty or jurisdiction, including the exclusive economic zone and the continental shelf, 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. - Be especially dedicated to the protection and maintenance of biological diversity, geodiversity and associated natural and cultural resources." There are many types and names, since most of the Autonomous Communities have legislated on this issue: National Parks, Natural Parks, Nature Reserves, Natura 2000 Network Areas, Biosphere Reserves... 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. There is a good level of governance and a comprehensive legal framework developed for Spanish protected areas. In turn, the aforementioned report produced by COSE and published by MAPAMA indicates 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. The study concludes that the Spanish regulations and surveillance procedures carried out by the Autonomous Communities are consistent. The Autonomous Communities have their own personnel to carry out the control over the high conservation values, Forestry/Environmental Agents. 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. In all cases there is a clear legal framework and effective control by the authorities of any potential threats to the high conservation values. Any harvesting activity that may affect rare or endangered species has limitations specified in the harvesting permit. In turn, 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). With all this information, the risk related to this indicator is classed as low.
Means of Verification	- 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

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	Indicator
2.2.4	The Biomass Producer has implemented appropriate control systems and procedures to ensure that biodiversity is protected (CPET S5b).
Finding	The concept of Biodiversity is linked to the high Conservation Values addressed in several previous indicators but is broader. Biodiversity or biological diversity can be defined as the variety of life. It covers the diversity of species of plants, animals, fungi and micro-organisms that live in a given space, their genetic variability, the ecosystems of which these species form part, and the landscapes or regions where the ecosystems are located. It also includes the ecological and evolutionary processes that occur in terms of genes, species, ecosystems and landscapes. Spain is one of the countries with the greatest biological diversity in the EU due, among other factors, to its geographical position, its geological diversity, its great climatic, orographic and soil variability, its paleobiogeographic history and the existence of islands. Law 42/2007 on Natural Heritage and Biodiversity establishes the basic legal framework for the conservation, sustainable use, improvement and restoration of natural heritage and biodiversity, establishing a series of instruments for the knowledge and planning of natural heritage and biodiversity, such as the Spanish Inventory of Natural Heritage and Biodiversity, the Strategic Plan for Natural Heritage and Biodiversity and the Guidelines for the Management of Natural Resources. With regards the conservation of habitats and natural areas, it incorporates the Protected Marine Areas, and includes the provisions related to the Natura 2000 European Ecological Network and the Areas protected by international instruments. In terms of the conservation of wild biodiversity, the law creates the List of Species under the Special Protection Regime and the Spanish Catalogue of Threatened Species, as well as the Spanish Catalogue of Invasive Alien Species. It also regulates the protection of species in relation to hunting and inland fishing and establishes the Spanish Hunting and Fishing Inventory. It also regulates access to genetic resources from wild taxa and the distribution of the benefits arising from their utilisation. The law also creates the Fund for Natural Heritage and Biodiversity, a co-financing instrument aimed at ensuring territorial cohesion and the achievement of the objectives of the law, the State Commission for Natural Heritage and Biodiversity, as an advisory and cooperation body between the State and the autonomous communities, and the State Council for Natural Heritage and Biodiversity, as a public participation body in the field of conservation and the sustainable use of natural heritage and biodiversity. In addition, as stated in previous indicators, in Spain there is a systematic legal framework for protection and a good level of governance linked to the degree of control by the forestry authority over activities in the natural environment, which is considered to be high or very high in all the Autonomous Communities except in Galicia, where it is considered to be medium. Furthermore, Integra Fuels has a Manual of Good Forestry Practices that includes general modes of action for its field workers with basic measures for protecting the existing biodiversity. Taking into account all of the information above, the risk related to this indicator is classed as: 1. low for forestry work/harvesting in public contracts. 2. low for forestry work/harvesting on private property where prior authorisations(s) for the work is/are required from the competent authority or authorities.
Means of Verification	• Existing legal framework. Laws, regulations and control bodies • Technical Specifications for the allocation of the public forest works contract • Code of Good Environmental Practices. • Good Environmental Practices in Sustainable Forest Management. • Contracts with suppliers • Information received from suppliers on the environmental assessment of the work

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	Indicator
2.2.5	The Biomass Producer has implemented appropriate control systems and procedures for verifying that the process of residue removal minimises harm to ecosystems.
Finding	With regards this issue we must remember that 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 the control tasks. 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. The procedure for waste management is usually specified in the Technical Specifications, authorisations or contracts that govern the execution of the work. Most of the Autonomous Communities have their own regulations for the management of forestry waste from authorised works and activities, and those that are not authorised. In addition, the burning of waste requires prior authorisation. Integra Fuels also holds ISO 9001, ISO 14001 and OSHAS 18001 certifications, and has a Code of Good Environmental Practices in Sustainable Forestry Management that develops the different ways to manage the forestry waste resulting from the works. Integra Fuels undertakes work to harvest and improve forest cover; the methodology applied to remove forestry waste is shredding and burning, with shredding being the most commonly used method. Similarly, and due to its commercial activity, a large amount of forest waste is used for biomass. In addition, there is the final inspection task carried out by the Administration/owner, which requires compliance with the requirements of the Tender Specifications or contract regarding the waste treatment. Integra Fuels has 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 Integra Fuels buys chips from other suppliers, and therefore the work in the forest is not under its control, under contract it obliges the supplier to provide its Manual of Good Environmental and Forestry Practices and to follow it and implement it in the work to be carried out. The technical personnel of Integra Fuels is responsible for collecting this information and ensuring compliance. In addition to this, and the level of control held by the public administrations, at the end of the works Integra Fuels always produces a works completion report with the owner that assesses the state of the work zone to check that there is no damage. Based on the foregoing, the risk related to this indicator is low.
Means of Verification	• Existing legal framework. Laws, regulations and control bodies • Manual of good environmental practices • Good Environmental Practices in Sustainable Forest Management • Contracts with suppliers • Information received from suppliers on the environmental assessment of the work • Assessment of potential impacts at site level • Assessment of the measures taken to minimise impacts • Monitoring results • Field visits to forestry work in progress • Partial completion certificate. • Final completion certificate.

Evidence Reviewed	Forestry Law consolidated text (Forestry Law 43/2003 amended by Laws 10/2006, of 28 April and 21/2015, of 20 July): https://www.boe.es/buscar/act.php?id=BOE-A-2003-21339 Law 2/1992, of 15 June, Forestry law of Andalucía: https://www.boe.es/buscar/act.php?id=BOE-A-1992-15996 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 Guide of Good Practices for the Prevention of Forest Fires: http://lifeomontevivo.org/docs/guiaprevinforpropfor.pdf Integra Fuels. Environmental and forestry management system
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.2.6	The Biomass Producer 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).
Finding	Forest cover and its appropriate management has a positive impact on water resources, especially if compared to other uses such as agriculture. On the impact of desertification see indicator 2.2.2. With regards the protection of the headwaters of river basins, see indicator 2.5.2. These areas normally have protected reforestation carried out by the administration and protected by both state and regional legislation. Integra Fuels also has 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 ✓ Code of good environmental practices in Sustainable Forest Management that is known by all the company's workers and subcontractors. In this manual, basic protection measures are developed, such as safeguarding rivers and riparian vegetation, wetlands and small water springs, and in the case of the existence of water resources, physical and chemical alterations to water and watercourses are avoided, safeguarding areas of public hydraulic domain and avoiding the dragging of materials caused by erosive processes. ✓ When Integra Fuels buys chips from other suppliers, and therefore the work in the forest is not under its control, under contract it obliges the supplier to provide its Manual of Good Environmental and Forestry Practices and to follow it and implement it in the work to be carried out. The technical personnel of Integra Fuels is responsible for collecting this information and ensuring compliance. In addition to this, and the level of control held by the public administrations, at the end of the works Integra Fuels always produces a works completion report with the owner that assesses the state of the work zone to check that there is no damage. Based on the foregoing, the risk related to this indicator is low.
Means of Verification	• Existing legal framework. Laws, regulations and control bodies • Technical Specifications for the allocation of the public forest works contract • Forestry work/harvesting authorisation • Manual of good environmental practices • Good Environmental Practices in Sustainable Forest Management • Contracts with suppliers • Information received from suppliers on the environmental assessment of the work • Assessment of potential impacts at site level and assessment of the measures taken to minimise impacts • Monitoring results

	• Field visits to forestry work in progress • Partial completion certificate. • Final completion certificate.
Evidence Reviewed	Forestry Law consolidated text (Forestry Law 43/2003 amended by Laws 10/2006, of 28 April and 21/2015, of 20 July): https://www.boe.es/buscar/act.php?id=BOE-A-2003-21339 Law 2/1992, of 15 June, Forestry law of Andalucía: https://www.boe.es/buscar/act.php?id=BOE-A-1992-15996 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 MAPAMA: National Inventory of Soil Erosion(INES): http://www.mapama.gob.es/es/desarrollo-rural/temas/politica-forestal/inventario-cartografia/inventario-nacional-erosion-suelos/ MAPAMA, National Action Programme against Desertification (PAND): http://www.mapama.gob.es/es/desarrollo-rural/temas/politica-forestal/desertificacion-restauracion-forestal/lucha-contra-la-desertificacion/lch_pand_descargas.aspx MAPAMA, Regulatory Framework for Hydrological Planning: http://www.mapama.gob.es/es/agua/legislacion/Marco_normativo_planificacion.aspx Spanish Society of Forest Sciences (http://secforestales.org/content/informe-isfe): • Report on the situation of forests and the forestry sector in Spain 2013 (ISFE) • ISFE 2017 Progress Report Integra Fuels environmental and forestry management systems
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.2.7	The Biomass Producer has implemented appropriate control systems and procedures for verifying that air quality is not adversely affected by forest management activities.
Finding	With regards this issue we must remember that 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 the control tasks. 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. The greatest impacts on air quality in forests are caused by fires or emissions from nearby heavy industries. Neither of these two factors are a consequence of forestry work/harvesting management activities. With regards the scope of the work carried out by Integra Fuels, the impacts on air quality are caused by the emissions from the machinery used to complete the work. Therefore, the work is not continuous in just one zone, so the impact is intermittent. Integra Fuels holds the ISO 9001, ISO 14001 and OSHAS 18001 certifications, and has an environmental policy with procedures implemented to minimise the emission of atmospheric pollutants. In forestry works three main sources of atmospheric pollution have been identified: - Dust To minimise the amount of dust produced by the works, it is necessary to proceed in moderation in those places where dust is generated. - Combustion gases from machinery and vehicles. To minimise the emission of gasses, the engines must be kept perfectly maintained and switched off when not in use. - Incineration of forest waste

	Other forest waste management methods should be supplied rather than incineration, thereby avoiding the emission of combustion gases, such as shredding. Integra Fuels also has 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 Integra Fuels buys chips from other suppliers, and therefore the work in the forest is not under its control, under contract it obliges the supplier to provide its Manual of Good Environmental and Forestry Practices and to follow it and implement it in the work to be carried out. The technical personnel of Integra Fuels are responsible for collecting this information and ensuring compliance. Based on the foregoing, the risk related to this indicator is classed as low.
Means of Verification	• Existing legal framework. Laws, regulations and control bodies • Manual of good environmental practices • Good Environmental Practices in Sustainable Forest Management • Contracts with suppliers • Information received from suppliers on the environmental assessment of the work • Assessment of potential impacts at site level and assessment of the measures taken to minimise impacts • Monitoring results
Evidence Reviewed	MAPAMA: • Air quality, regulations: http://www.mapama.gob.es/es/calidad-y-evaluacion-ambiental/temas/atmosfera-y-calidad-del-aire/calidad-del-aire/normativa/ • Law 34/2007, of 15 November, on air quality and protection of the atmosphere: https://www.boe.es/buscar/pdf/2007/BOE-A-2007-19744-consolidado.pdf Integra Fuels. Environmental and forestry management system
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.2.8	The Biomass Producer has implemented appropriate control systems and procedures for verifying that there is controlled and appropriate use of chemicals, and that Integrated Pest Management (IPM) is implemented wherever possible in forest management activities (CPET S5c).
Finding	With regards this issue we must remember that 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 the control tasks. 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 caused by the use of chemicals linked to forestry work/harvesting. 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. Integra Fuels holds the ISO 9001, ISO 14001 and OSHAS 18001 certifications, and has an environmental policy for chemical management with a system to control the use of pesticides, and it also carries out analyses through authorised laboratories when necessary, when there is a risk of pests. In addition, before starting any harvesting works, Integra Fuels requests information on the area of action, and in the event of a pest risk, the work is

	cancelled. In addition, Integra Fuels has a system implemented with the following elements in order to minimize possible impacts: ✓ 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 Integra Fuels buys chips from other suppliers, and therefore the work in the forest is not under its control, under contract it obliges the supplier to provide its Manual of Good Environmental and Forestry Practices and to follow it and implement it in the work to be carried out. The technical personnel of Integra Fuels is responsible for collecting this information and ensuring compliance. Based on the foregoing, the risk related to this indicator is classed as low.
Means of Verification	• Existing legal framework. Laws, regulations and control bodies • Manual of good environmental practices • Good Environmental Practices in Sustainable Forest Management • Contracts with suppliers • Information received from suppliers on the environmental assessment of the work • Assessment of potential impacts at site level • Assessment of the measures taken to minimise impacts • Monitoring results • Field visits to forestry work in progress
Evidence Reviewed	Ministry of Health, Social Services and Equality: • Chemical substances legislation: https://www.msssi.gob.es/ciudadanos/saludAmbLaboral/prodQuimicos/legislacion.htm • Royal Decree 830/2010, of 25 June, which establishes the regulations governing training in biocide treatment: https://www.boe.es/boe/dias/2010/07/14/pdfs/BOE-A-2010-11157.pdf Ministry of the Presidency, Royal Decree 1311/2012, of 14 September, establishing the framework for action to achieve a sustainable use of plant protection products: https://www.boe.es/boe/dias/2012/09/15/pdfs/BOE-A-2012-11605.pdf Integra Fuels. Environmental and forestry management system
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.2.9	The Biomass Producer has implemented appropriate control systems and procedures for verifying that methods of waste disposal minimise negative impacts on forest ecosystems (CPET S5d).
Finding	With regards this issue we must remember that 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 the control tasks. 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 caused by the production of waste linked to forestry work/harvesting. Integra Fuels holds the ISO 9001, ISO 14001 and OSHAS 18001 certifications, and has an environmental policy aimed at reducing waste production as much as possible and reusing and recycling any waste that is produced. The waste management system of Integra Fuels 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, following the instructions listed below: • Do not mix hazardous waste. • Dispose of hazardous waste through an authorised waste management company Integra Fuels also has 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 Integra Fuels buys chips from other suppliers, and therefore the work in the forest is not under its control, under contract it obliges the supplier to provide its Manual of Good Environmental and Forestry Practices and to follow it and implement it in the work to be carried out. The technical personnel of Integra Fuels is responsible for collecting this information and ensuring compliance. In addition to this, and the level of control held by the public administrations, at the end of the works Integra Fuels always produces a works completion report with the owner that assesses the state of the work zone to check that there is no damage or effects caused by waste. Based on the foregoing, the risk related to this indicator is low.
Means of Verification	• Existing legal framework. Laws, regulations and control bodies • Manual of good environmental practices • Good Environmental Practices in Sustainable Forest Management • Contracts with suppliers • Information received from suppliers on the environmental assessment of the work • Assessment of potential impacts at site level • Assessment of the measures taken to minimise impacts • Monitoring results • Field visits to forestry work in progress • Partial completion certificates. • Final completion certificates.
Evidence Reviewed	MAPAMA, waste management and prevention, regulations and planning: http://www.mapama.gob.es/es/calidad-y-evaluacion-ambiental/temas/prevencion-y-gestion-residuos/normativa-y-planificacion/ Law 22/2011 on contaminated soil and waste: https://www.boe.es/buscar/pdf/2011/BOE-A-2011-13046-consolidado.pdf Integra Fuels. Environmental and forestry management
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.3.1	Analysis shows that feedstock harvesting does not exceed the long-term production capacity of the forest, avoids significant negative impacts on forest productivity and ensures long-term economic viability. Harvest levels are justified by inventory and growth data.

The available forestry statistics (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 actually cut down and 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.

In the 2012 figures, the extraction rate per Autonomous Community is shown below:

Tabla 64: Tasa de extracción (extracción / crecimiento) y tasa de cobertura (extracción / consumo de madera) de los recursos maderables por CC. AA. con referencia a 2010. Los crecimientos anuales son los expresados en el Anuario de Estadística Forestal de 2010 obtenidos por diferencias entre IFN3 e IFN2 o entre IFN4 e IFN3, según los casos. Los volúmenes de extracción se refieren a las cortas de maderas realizadas en 2010, según el Anuario de Estadística Agraria de 2012, incluyendo datos estimados para Extremadura y Madrid por información de 2011. Consumo de madera según SECF (2010).

Comunidad Autónoma	Tasa de extracción (%)	Crecimiento (m ³ x 1000)	Extracción (m ³ x 1000)	Consumo de madera (m ³ x 1000)	Tasa de Cobertura (%)	Sup. Arbolada (x 1000 ha)	Intensidad de cortas (m ³ /ha arbolada)
Andalucía	12	3.075	368	5.542	6,6	2.656	0,14
Aragón	6	2.760	171	893	19,1	1.578	0,11
Asturias	29	2.810	820	720	113,8	451	1,82
Baleares	5	222	10	728	1,4	186	0,05
Canarias	4	383	15	1.412	1,1	134	0,11
Cantabria	42	1.215	505	392	128,8	214	2,36
Castilla La Mancha	7	3.374	227	1.375	16,5	2.740	0,08
Castilla y León	20	7.204	1.470	1.707	86,1	2.982	0,49
Cataluña	15	3.964	615	4.957	12,4	1.626	0,38
Comunidad Valenciana	5	756	40	3.394	1,2	754	0,05
Extremadura	51	1.223	631	735	85,8	1.921	0,33
Galicia	58	13.057	7.619	1.862	409,2	1.405	5,42
La Rioja	6	728	42	215	19,5	170	0,24
Madrid	7	394	27	4.281	0,6	270	0,10
Murcia	1	237	2	982	0,2	316	0,01
Navarra	21	1.488	315	418	75,3	463	0,68
País Vasco	27	3.831	1.021	1.453	69,6	398	2,56
Total España	30	46.722	13.898	31.066	44,7	18.264	0,76

Fuente: MAGRAMA (2012)

In view of all the information above, the risk related to this indicator is classed as low.

Means of Verification

- Management Plan, stocks and growth data
- National or regional inventories, stocks and growth data.
- Harvested volume data

Evidence Reviewed

MAPAMA:

- Ministry: <http://www.mapama.gob.es/es/>
- Biodiversity: <http://www.mapama.gob.es/es/biodiversidad/temas/>
- Forestry statistics: http://www.mapama.gob.es/es/biodiversidad/estadisticas/forestal_anuarios_todos.aspx

	• IFN3: http://www.mapama.gob.es/es/biodiversidad/servicios/banco-datos-naturaleza/informacion-disponible/ifn3.aspx • Forestry Harvesting Statistics: http://www.mapama.gob.es/es/desarrollo-rural/estadisticas/forestal_aprovechamientos.aspx Junta de Andalucía: • Regional Ministry of Environment and Territorial Planning: http://www.juntadeandalucia.es/medioambiente/site/portalweb • Forestry Service: https://goo.gl/o7bEfQ • Plan Infoca. The Natural Environment of Andalucía. Region of Murcia: • Natural Environment: http://www.murcianatural.carm.es/web/guest • Forestry Sector: http://www.murcianatural.carm.es/web/guest/ambito-forestal Valencian Community: • Natural Environment: https://goo.gl/7umhzn • Forests and Woodland: http://www.agroambient.gva.es/es/web/medio-natural/montes • http://www.agroambient.gva.es/web/medio-natural/el-territorio-forestal-de-la-comunitat-valenciana Spanish Society of Forest Sciences: • Report on the situation of forests and the forestry sector in Spain 2013 (ISFE) (http://secforestales.org/content/informe-isfe) • ISFE 2017 Progress Report
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.3.2	Adequate training is provided for all personnel, including employees and contractors (CPET S6d).
Finding	Integra Fuels has an implemented system that covers all the aspects to be considered to ensure compliance with the legislation on Occupational Risk Prevention and Occupational Health and Safety, including the appropriate training for workers. This system covers its own workers as well as its subcontractors and suppliers. A large number of companies contract an external prevention service that is in charge of carrying out the assessment of the company's occupational risks, implementing the necessary measures to minimise them and providing adequate training for the company's workers. This is the case of Integra Fuels, which holds a prevention service contract with the company Quirón Prevención S.L.U. It is through this channel that Integra Fuels carries out training plans for all its personnel. For subcontractors and suppliers, Integra Fuels requests that all documentation relating to the working conditions of workers, including through the Training Certificates and Information required in the field of Occupational Risk Prevention, be submitted for verification. In addition, Integra Fuels has a Manual of Good Forestry Practices developed and implemented which describes all the forestry work, the way to approach it, the preventive safety measures necessary and the correct procedure to follow in the event of an accident or emergency. Integra Fuels certifies the training of its workers in this respect. By contract, subcontracted companies and suppliers must have a Manual of Good Forestry Practices and certify its implementation to Integra personnel, or use the Integra Fuels Manual.

	Th system developed is considered complete and sufficient to ensure adequate training of the company's own personnel and external personnel. Based on the foregoing, the risk related to this indicator is classed as low.
Means of Verification	- Existing legal framework. Laws, regulations and control bodies. - Training plan, course registration and training material - Records of training courses held - Monitoring of compliance with Employment and Social Security regulations. - Interviews with workers
Evidence Reviewed	Integra Fuels Environmental System. Law 31/1995 on the Prevention of Occupational Risks: https://www.boe.es/buscar/pdf/1995/BOE-A-1995-24292-consolidado.pdf Royal Decree 39/1997 approving the Regulation of Prevention Services: https://www.boe.es/buscar/pdf/1997/BOE-A-1997-1853-consolidado.pdf Ministry of Employment and Social Security, Employment guide, prevention of occupational risks: http://www.empleo.gob.es/es/guia/texto/guia_10/contenidos/guia_10_22_2.htm Spanish legislation on Employment and Social Security: https://www.boe.es/legislacion/codigos/codigo.php?id=93&modo=1&nota=0&tab=2
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator												
2.3.3	Analysis shows that feedstock harvesting and biomass production positively contribute to the local economy, including employment.												
Finding	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 2012-2016. With regards economic impacts and employment in the local economy of the Autonomous Communities subject to this report, timber producing forests are scarce and income comes more from other products and services. Number of forestry companies in 2016: Número de empresas forestales <table> <tr> <td>Nº. Empresas Forestales [IAE 912] en 2016 (ud):</td><td>664</td></tr> <tr> <td>Sociedades 2016 (ud):</td><td>388</td></tr> <tr> <td>Autónomos 2016 (ud):</td><td>276</td></tr> </table> Fuente: Camerdata. Andalucía Número de empresas forestales <table> <tr> <td>Nº. Empresas Forestales [IAE 912] en 2016 (ud):</td><td>373</td></tr> <tr> <td>Sociedades 2016 (ud):</td><td>114</td></tr> <tr> <td>Autónomos 2016 (ud):</td><td>259</td></tr> </table> Fuente: Camerdata. Valencian Community	Nº. Empresas Forestales [IAE 912] en 2016 (ud):	664	Sociedades 2016 (ud):	388	Autónomos 2016 (ud):	276	Nº. Empresas Forestales [IAE 912] en 2016 (ud):	373	Sociedades 2016 (ud):	114	Autónomos 2016 (ud):	259
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Sociedades 2016 (ud):	114												
Autónomos 2016 (ud):	259												

Número de empresas forestales

Nº. Empresas Forestales (IAE 912) en 2016 (ud): 80

Sociedades 2016 (ud): 50

Autónomos 2016 (ud): 30

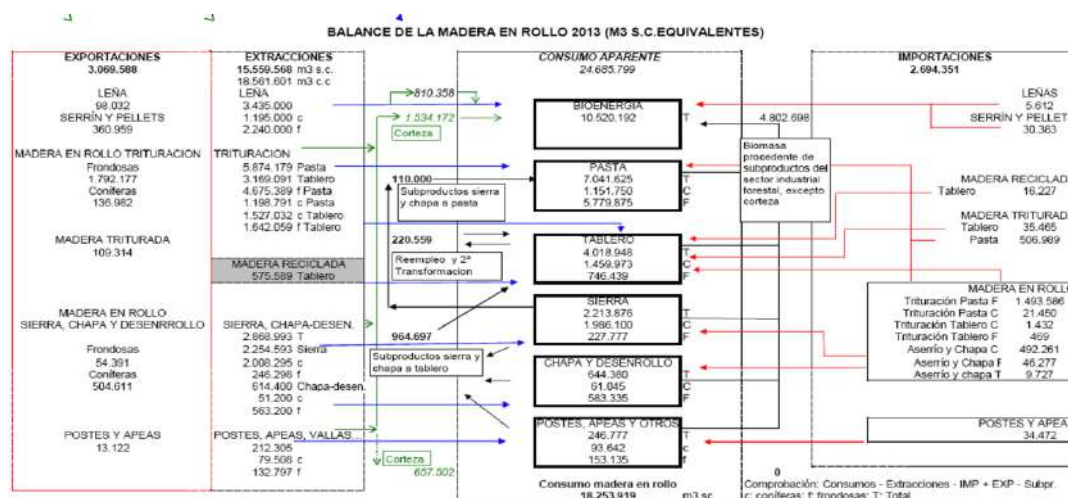
Fuente: Camerdata.

Region of Murcia

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

Análisis autonómico de las cortas totales de coníferas y frondosas, 2013

Comunidades Autónomas	Coníferas (m3 cc)	Frondosas (m3 cc)	Total (m3 con corteza)
Andalucía	277.651	80.032	357.682
Aragón	144.447	48.079	192.526
Canarias	465	4.548	5.013
Cantabria	71.791	377.254	449.045
Castilla La Mancha	244.431	46.571	291.002
Castilla y León	1.724.441	491.323	2.215.764
Cataluña	580.211	113.619	693.831
Comunidad de Madrid	26.795	583	27.379
Comunidad Foral de Na	205.678	137.231	342.909
Comunidad Valenciana	63.918	2.213	66.131
Extremadura	103.832	77.542	181.374
Galicia	3.418.410	4.370.118	7.788.528
Islas Baleares	45.356	1.912	47.269
La Rioja	110.053	37.103	147.156
País Vasco	1.122.204	151.897	1.274.101
Principado de Asturias	233.836	737.006	970.841
Región de Murcia	4.944	4.278	9.222
ESPAÑA	8.378.464	6.681.310	15.059.774



The working population employed in fields related to the forestry sector represented, in 2016, 5.7% of the total active population employed. This percentage has remained fairly constant since 2008, when it stabilised after a steady decline.

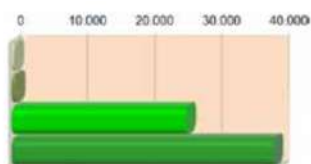
Although in the most relevant years of the economic crisis, the forestry sector maintained very constant relative percentages of the working population, demonstrating the capacity to adapt to cope with difficult situations, it is to be expected that in the short term these percentages may increase in the future, based on the green employment generated by the use of sustainable energy such as biomass, a greater enhancement of the multifunctionality of forestry together with people's greater awareness of the benefits, both direct and indirect (social, economic and environmental), etc.

Data on contracts awarded in the primary forestry sector in 2016

Andalucía

Contratos realizados en el sector forestal primario

Distribución de los contratos (media 15-16)



Fuente: SEPE, Observatorio ocupacional.

Contrato de Ocupación	13	14	15	16	MEDIA 15-16
Ingenieros de Montes y Directores de producción de explotaciones agropecuarias y forestales*	465	562	640	682	661
Ingenieros Técnicos Forestales y del Medio Natural	799	900	858	840	849
Trabajadores cualificados en actividades forestales y del medio natural*	22.495	25.025	25.718	26.777	26.248
Peones forestales y de la caza	26.572	36.123	41.641	36.809	39.225

* Ver apartado Metodología.

Valencian Community

Contratos realizados en el sector forestal primario

Distribución de los contratos (media 15-16)



Fuente: SEPE, Observatorio ocupacional.

Contrato de Ocupación	13	14	15	16	MEDIA 15-16
Ingenieros de Montes y Directores de producción de explotaciones agropecuarias y forestales*	22	28	34	35	35
Ingenieros Técnicos Forestales y del Medio Natural	50	21	45	36	41
Trabajadores cualificados en actividades forestales y del medio natural*	594	996	1.453	1.386	1.420
Peones forestales y de la caza	731	1.010	1.153	807	980

* Ver apartado Metodología.

Region of Murcia

Contratos realizados en el sector forestal primario

Distribución de los contratos (media 15-16)



Fuente: SEPE, Observatorio ocupacional.

Contrato de Ocupación	13	14	15	16	MEDIA 15-16
Ingenieros de Montes y Directores de producción de explotaciones agropecuarias y forestales*	12	5	17	19	18
Ingenieros Técnicos Forestales y del Medio Natural	17	27	21	13	17
Trabajadores cualificados en actividades forestales y del medio natural*	389	402	325	431	378
Peones forestales y de la caza	138	71	143	109	126

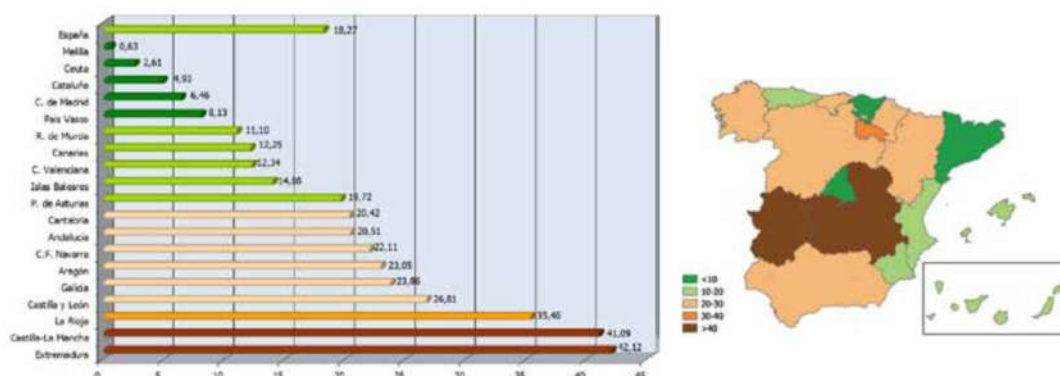
* Ver apartado Metodología.

Another important aspect of forestry economy is the level of investment made by public administrations, which is an important source of economic resource mobilisation and generates employment.

Año	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Inversión Total (miles de €)	52.278.745	56.162.224	56.580.573	56.581.772	41.216.232	31.999.386	28.859.818	29.726.256	29.789.115	27.994.316
Inversión Total actualizada a Enero 2016 (miles de €)	59.179.540	60.992.176	60.937.278	60.316.169	42.576.367	32.383.378	28.461.359	29.258.126	29.700.015	27.944.316
Inversión en el Sector Forestal (miles de €)	1.413.787	1.556.929	1.741.980	1.552.076	1.088.776	1.011.645	992.658	873.348	972.087	850.793
Inversión en el Sector Forestal actualizada a Enero 2016 (miles de €)	1.600.407	1.690.825	1.876.113	1.654.513	1.124.706	1.023.784	978.952	859.595	969.180	850.793

Tabla 2. Fuente: Administraciones competentes, INE y elaboración propia.

Inversión en el sector forestal por habitante (€/hab)



The impact of the work carried out by Integra Fuels covers both forestry harvesting in private forests and the mobilisation of resources from Public Administrations, either through grants or direct investment.

Integra Fuels also outsources the execution of certain works or buys the material already transformed from local companies, generating an economic chain.

And although Fuels has mostly formed its work teams, who are already specialised in the work carried out by the company, it is always necessary to complete the teams with local personnel from the area where the work is carried out. In addition, the displacement of the teams has a positive impact on local economies as they relocate to the work areas.

In view of all the information above, the risk related to this indicator is classed as low.

Means of Verification

- Analysis of the contribution to the local economy.
- Description of the direct economic value created
- Records of personnel and jobs created

Evidence Reviewed

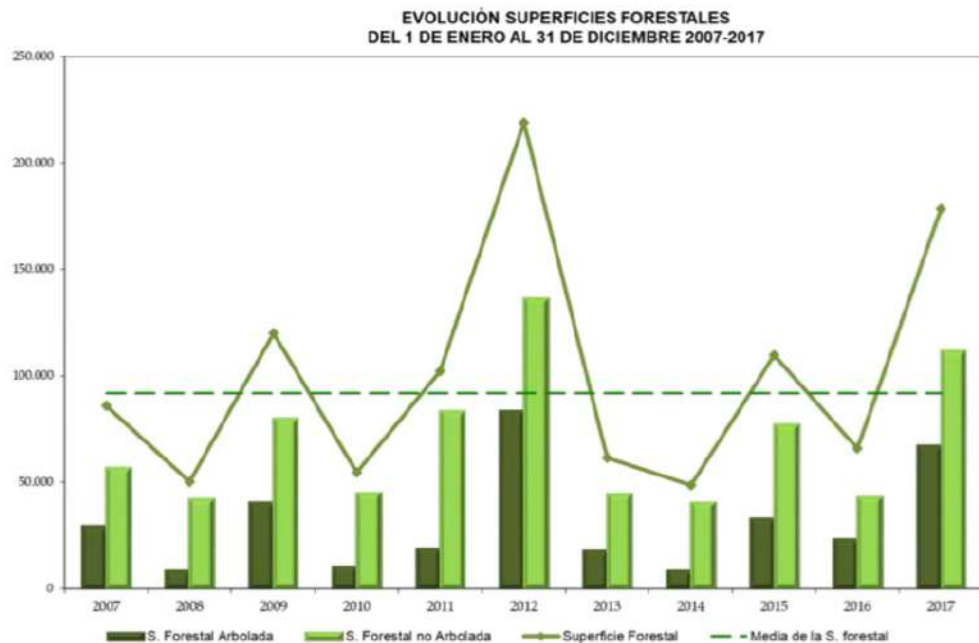
- ASEMFO, Employment and investment study in the forestry sector: <http://www.asemfo.org> (http://www.asemfo.org/empresas/asemfo/X_estudio_DEF_web.pdf)
- MAPAMA:
- Forestry economy and foreign trade: http://www.mapama.gob.es/es/desarrollo-rural/estadisticas/forestal_econ_comercio_exterior.aspx
 - Summary of annual logging statistics 2005-2013.xls

	• Summary of statistics of forestry products and timber foreign trade 2005-2013.xls • Spanish Society of Forest Sciences (http://secforestales.org/content/informe-isfe) • Report on the situation of forests and the forestry sector in Spain 2013 (ISFE) • ISFE 2017 Progress Report Article with global data of the timber industry: https://www.asturias.es/RecursosWeb/trabajastur/Estudios%20Sectoriales/Documentos/Actualizacion_Forestal_madera_2015.pdf on the situation of forests and the forestry sector in Spain 2013 (ISFE) (http://secforestales.org/content/informe-isfe)
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.4.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that the health, vitality and other services provided by forest ecosystems are maintained or improved (CPET S7a).
Finding	According to current reports, the phytosanitary situation of Spanish forests has recently worsened due to drought, starting from a situation of no concern in terms of tree mortality. The introduction of foreign pests and pathogens and climate change are currently the main threats to the health of our forests, along with forest fires. Changes in climate are changing the dynamics of alterations caused by native insects and forest pathogens, as well as facilitating the establishment and spread of introduced species of pests. Such changes in the dynamics of alterations, coupled with the direct impact of climate change on trees and forest ecosystems, can have negative effects and increase the vulnerability of forests to other disturbances. The introduction of dangerous invasive alien species into our forests continues. New organisms, such as the bacterium <i>Xylella fastidiosa</i>, the chestnut gall wasp (<i>Dryocosmus kuriphilus</i>) or the western conifer seed bug (<i>Leptoglossus occidentalis</i>), have recently joined other quarantined organisms detected, such as the pine wood nematode (<i>Bursaphelenchus xylophilus</i>) or the pine pitch canker (<i>Fusarium circinatum</i>). The chart below shows how the percentage of trees with more than 25% defoliated canopy has increased significantly in the last 2 years from 15% to values close to 25%, with the increase being particularly pronounced in conifers. Evolución anual para coníferas y frondosas del grado de defoliación, porcentaje de árboles con más del 25% de la copa defoliada, en los sucesivos inventarios. Fuente IDF España, 1987 - 2016

	There is a systematic legal framework, with action plans implemented at government level to manage the main problems detected and a data monitoring network (European Forest Damage Monitoring Network). In addition, the level of control by the forestry authority is medium/high throughout the whole country. Therefore, the Spanish regulations and the surveillance procedures carried out by the Autonomous Communities are coherent. The scope of this evaluation is the impact/effect of forestry operations on the indicators assessed. Forestry operations normally have a positive impact on the control of forest diseases such as pine wood nematode, since one of the control measures is to reduce the plants that show signs of deterioration. Furthermore, as already mentioned, there are manuals of good forestry practices implemented, monitoring results, examples of implementing legislation, reports and action plans related to the main diseases and pests. Therefore, it is concluded that the situation is being addressed and the risk related to this indicator is classed as low.
Means of Verification	- Existing legal framework. Laws, regulations and control bodies - Assessment of the potential impacts of forestry operations on the health and vitality of forests. - Assessment of potential impacts at site level and of the measures taken to minimise them - Good Environmental Practices in Sustainable Forest Management - Contracts with suppliers - Information received from suppliers - Monitoring results - Consultation with experts
Evidence Reviewed	Spanish Society of Forest Sciences: http://secforestales.org/content/informe-isfe - Report on the situation of forests and the forestry sector in Spain 2013 (ISFE) - ISFE 2013 Executive Report - ISFE 2017 Progress Report European Forest Damage Network, Level I: http://www.mapama.gob.es/es/desarrollo-rural/temas/politica-forestal/inventario-cartografia/redes-europeas-seguimiento-bosques/red_nivel_I_danos.aspx European Forest Damage Network, Network Results of Level II: http://www.mapama.gob.es/es/desarrollo-rural/temas/politica-forestal/inventario-cartografia/redes-europeas-seguimiento-bosques/red_nivel_II_resultados.aspx MAPAMA: - Plant Health: http://www.mapama.gob.es/es/agricultura/temas/sanidad-vegetal/default.aspx - Pine Wood Nematode: http://www.mapama.gob.es/es/agricultura/temas/sanidad-vegetal/nematodo-de-la-madera-del-pino/ Law 43/2002 on Plant Health: http://www.boe.es/buscar/act.php?id=BOE-A-2002-22649 Junta de Andalucía, Plant Health: http://www.juntadeandalucia.es/organismos/agriculturapescayderos/agricultura/areas/agricultura/sanidad-vegetal.html Valencian Community, Plant Health: http://www.agroambient.gva.es/es/sanidad-vegetal Region of Murcia, Plant Health: https://www.carm.es/web/pagina?IDCONTENIDO=222&IDTIPO=140&RASTRO=c32\$m
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator																					
2.4.2	The Biomass Producer has implemented appropriate control systems and procedures for verifying that natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b).																					
Finding	With regards pests and diseases, see indicator 2.4.1 which certifies 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. 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. <table><thead><tr><th></th><th>MEDIA DEL DECENIO 2007-2017 (01/01/-31/12)</th><th>AÑO 2017 (01/01-31/12)</th></tr></thead><tbody><tr><td>Nº CONATOS (<1 ha)</td><td>8.228</td><td>8.705</td></tr><tr><td>Nº INCENDIOS (≥1 ha)</td><td>4.135</td><td>5.088</td></tr><tr><td>TOTAL SINIESTROS</td><td>12.363</td><td>13.793</td></tr></tbody></table> As for the areas affected, there is an increase compared to the average, of 145% in woodland and 94% in forest area. 2017 has the second highest percentage of the decade in terms of area affected. <table><thead><tr><th></th><th>MEDIA DEL DECENIO 2007-2017 (01/01/-31/12)</th><th>AÑO 2017 (01/01-31/12)</th></tr></thead><tbody><tr><td>S. ARBOLADA (ha)</td><td>27.226,41</td><td>66.839,02</td></tr><tr><td>S. FORESTAL (ha)</td><td>91.846,74</td><td>178.233,93</td></tr></tbody></table>		MEDIA DEL DECENIO 2007-2017 (01/01/-31/12)	AÑO 2017 (01/01-31/12)	Nº CONATOS (<1 ha)	8.228	8.705	Nº INCENDIOS (≥1 ha)	4.135	5.088	TOTAL SINIESTROS	12.363	13.793		MEDIA DEL DECENIO 2007-2017 (01/01/-31/12)	AÑO 2017 (01/01-31/12)	S. ARBOLADA (ha)	27.226,41	66.839,02	S. FORESTAL (ha)	91.846,74	178.233,93
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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 clasification:

1. Public forests in which Integra Fuels works. 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.
2. Private forests. All the existing legislation determines specific obligations or responsibilities of forest managers/owners concerning prevention/defence against forest fires:
 - In Andalucía 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 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. In addition to this, it is important to bear in mind that the work carried out by Integra Fuels, 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. In addition, Integra Fuels has 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 high risk forestry work is not permitted in the area. Therefore, the following level of risk is defined as: - low for pest and disease management - low for the management of forest fires in both public and privately-owned forests, based mainly on the positive impact on fire prevention of the work carried out and the implementation by Integra Fuels of measures to prevent fires while the work is being carried out.
Means of Verification	- Existing legal framework. Laws, regulations and control bodies - Assessment of the potential impacts of forestry operations on the health and vitality of forests. - Assessment of potential impacts at site level and of the measures taken to minimise them - Good Environmental Practices in Sustainable Forest Management - Contracts with suppliers - Information received from suppliers - Monitoring results and statistical data available - Consultation with experts
Evidence Reviewed	MAPAMA: - Forest fires: http://www.mapama.gob.es/es/desarrollo-rural/temas/politica-forestal/incendios-forestales/ - Forest fire regulations: http://www.mapama.gob.es/es/desarrollo-rural/legislacion/leg-espanola-forestal-incendios.aspx - Forest Fire Statistics: http://www.mapama.gob.es/es/desarrollo-rural/estadisticas/Incendios_default.aspx - Forest fire data 2017. Update: http://www.mapama.gob.es/es/desarrollo-rural/estadisticas/iiff_2017_def_tcm30-446071.pdf Forestry Law consolidated text (Forestry Law 43/2003 amended by Laws 10/2006, of 28 April and 21/2015, of 20 July): https://www.boe.es/buscar/act.php?id=BOE-A-2003-21339 Law 2/1992, of 15 June, Forestry law of Andalucía: https://www.boe.es/buscar/act.php?id=BOE-A-1992-15996 Law 5/1999 on the Prevention and Combatting of Forest Fires in Andalucía: https://www.boe.es/buscar/pdf/1992/BOE-A-1992-15996-consolidado.pdf 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

	Fire Prevention Legislation of the Valencian Community: http://www.agroambient.gva.es/es/legislacion-prevencion-de-indencios-forestales Spanish Society of Forest Sciences: • http://secforestales.org/content/informe-isfe • Report on the situation of forests and the forestry sector in Spain 2013 (ISFE) • ISFE 2017 Progress Report
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.4.3	The Biomass Producer has implemented appropriate control systems and procedures for verifying that there is adequate protection of the forest from unauthorised activities, such as illegal logging, mining and encroachment (CPETS7c).
Finding	There are no significant problems in Spain with regards unauthorised or illegal activities in forests such as logging, mining or illegal occupation. Small-scale problems are identified, such as unauthorised sports activities, theft of firewood, wood or fruit, poaching, fly-tipping, feral dogs... Illegal or unauthorised activities have a small impact on Spanish forests and there are no reports of situations of substantial magnitude with regards this issue. Therefore, the risk related to this indicator is classed as low.
Means of Verification	• Records of field inspections and monitoring • Interviews with workers • Interviews with relevant parties • Public information available (media)
Evidence Reviewed	Illegal Logging Portal, Spain: https://www.illegal-logging.info/regions/spain Transparency International. CPI Spain: https://www.transparency.org/country/ESP
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.5.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that legal, customary and traditional tenure and use rights of indigenous people and local communities related to the forest are identified, documented and respected (CPET S9).
Finding	In Spain there are many ancient customary rights linked to the forests of the Iberian Peninsula. There are no relevant conflicts related to these rights and where they exist there are established channels for their management and resolution. Many of these uses have died out due to disuse or they simply exist, but are not exercised and others have been integrated into the management of the forests (public roads, firewood, communal management...). An example of these uses is the Communal Forests, both Roman and Germanic, which have been gradually recovered since the establishment of democracy in 1977. Where communities have been able to demonstrate common use by local residents, they have been declared Neighbourhood Forests. There are Neighbourhood Forest Boards and legislation to regulate their activity. 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.

	There are no indigenous peoples or minority groups in Spain that required special protection in terms of their use rights of the forests, and there are no local communities that depend on the services of the forests in order to survive. Therefore, the risk related to this indicator is classed as low.
Means of Verification	• Customary rights, when applicable, are identified and documented • Interviews with local communities or other relevant parties • There are appropriate procedures in place to resolve any conflicts
Evidence Reviewed	Forestry Law consolidated text (Forestry Law 43/2003 amended by Laws 10/2006, of 28 April and 21/2015, of 20 July): https://www.boe.es/buscar/act.php?id=BOE-A-2003-21339 Civil Code: https://www.boe.es/buscar/pdf/1889/BOE-A-1889-4763-consolidado.pdf Law 2/1992, of 15 June, Forestry law of Andalucía: https://www.boe.es/buscar/act.php?id=BOE-A-1992-15996 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
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.5.2	The Biomass Producer has implemented appropriate control systems and procedures for verifying that production of feedstock does not endanger food, water supply or subsistence means of communities, where the use of this specific feedstock or water is essential for the fulfilment of basic needs.
Finding	With regards this indicator, only the protection of the headwaters of the hydrographic basins in the driest areas of southern and eastern Spain is considered applicable. These areas normally have protected reforested areas carried out by the state administration and are protected by both 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 any case, operations in these forests require prior authorisation from the competent administration and inspection by the authority agents. Therefore the risk related to this indicator is classed as low.
Means of Verification	• Existing legal framework. Laws, regulations and control bodies • Technical Specifications for the allocation of the public forest works contract • Forestry work/harvesting authorisation
Evidence Reviewed	Forestry Law consolidated text (Forestry Law 43/2003 amended by Laws 10/2006, of 28 April and 21/2015, of 20 July): https://www.boe.es/buscar/act.php?id=BOE-A-2003-21339 MAPAMA, Regulatory Framework for Hydrological Planning: http://www.mapama.gob.es/es/agua/legislacion/Marco_normativo_planificacion.aspx Law 2/1992, of 15 June, Forestry law of Andalucía: https://www.boe.es/buscar/act.php?id=BOE-A-1992-15996 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
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.6.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that appropriate mechanisms are in place for resolving grievances and disputes, including those relating to tenure and use rights, to forest management practices and to work conditions.
Finding	In Spain there are clear and well-known legal channels for resolving conflicts that are also regulated by the corresponding laws. The legal framework of reference regarding land use and ownership rights, forest management activities and workers' conditions includes, among others: • Civil Code • Spanish Constitution • Forestry Law of the State and of the Autonomous Communities • Workers' Statute The exiting legal framework and different laws clearly define the responsibilities and duties of the people involved in these matters, as well as providing a clear framework for appeals or complaints in the event of disputes concerning these issues. In addition, Integra Fuels has a complaint handling procedure integrated in its various quality certificates: ISO 9001, ISO 14001 and OSHAS 18001, as well as the FSC chain of custody. Therefore, the risk related to this indicator is classed as low.
Means of Verification	• Existing legal framework • Level of governance • Manuals of good forestry practices • Existence of contracts
Evidence Reviewed	Civil Code: https://www.boe.es/buscar/pdf/1889/BOE-A-1889-4763-consolidado.pdf Spanish Constitution: https://www.boe.es/buscar/pdf/1978/BOE-A-1978-31229-consolidado.pdf Workers' Statute: https://www.boe.es/buscar/pdf/2015/BOE-A-2015-11430-consolidado.pdf Forestry Law consolidated text (Forestry Law 43/2003 amended by Laws 10/2006, of 28 April and 21/2015, of 20 July): https://www.boe.es/buscar/act.php?id=BOE-A-2003-21339 Law 2/1992, of 15 June, Forestry law of Andalucía: https://www.boe.es/buscar/act.php?id=BOE-A-1992-15996 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 Employment and Social Security Legislation: https://www.boe.es/legislacion/codigos/codigo.php?id=93&modo=1&nota=0&tab=2
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.7.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that Freedom of Association and the effective recognition of the right to collective bargaining are respected.
Finding	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. However, there are some concerns over civil rights in Spain, as reflected in reports by international organisations like Amnesty International (see the 2017 report on Spain), but none of the concerns is directly related to the forestry sector.

	In 2014, the International Trade Union Confederation (ITUC) published a report on working conditions in 139 countries, carrying out a study using 97 internationally-recognised indicators. Spain was given a score of 2 on a scale of 1 to 5 (where 1 is the highest score). A score of 2 means that there are repeated violations of rights, and that those violations can affect improvements in working conditions ("Certain rights have come under repeated attack by governments and / or companies and have undermined the struggle for better working conditions."). 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, shall include the guarantees needed to ensure the functioning of the community's essential services. There is also a Government of Spain Plan to fight illegal working and Social Security fraud. Labour inspectors form the Government-appointed authority to check labour and safety rights. Companies are inspected in respect of those matters, with violations being sanctioned and corrected. No relevant violations were found of the laws or rights of free association and collective bargaining in relation to the forestry sector. Accordingly, the risk relating to the indicator is classified as low.
Means of Verification	- Existing legal framework and level of governance - Contracts of employment - The existence of a collective-bargaining agreement - Company policies - Interviews with Heads of Human Resources - Interviews with workers
Evidence Reviewed	ILO Spain: http://www.ilo.org/madrid/oit-en-españa/lang-es/index.htm ILO Conventions: http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang-es/index.htm ITUC Global Rights Index: The world's worst countries for workers: http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf Spanish Constitution: https://www.boe.es/buscar/pdf/1978/BOE-A-1978-31229-consolidado.pdf Workers' Statute: https://www.boe.es/buscar/pdf/2015/BOE-A-2015-11430-consolidado.pdf Spanish Labour and Social Security Legislation: https://www.boe.es/legislacion/codigos/codigo.php?id=93&modo=1&nota=0&tab=2 http://www.congreso.es/consti/constitucion/indice/sinopsis/sinopsis.jsp?art=37&tipo=2 https://www.iberley.es/temas/contenido-caracteres-derecho-sindical-negociacion-colectiva-11381 Spanish Ministry of Employment and Social Security, 2018 Guide to Collective Bargaining: http://www.empleo.gob.es/es/sec_trabajo/ccncc/B_Actuaciones/Guia/GuiaNC_2018_web.pdf Spanish Ministry of Employment and Social Security, Strategic Plan for the Labour Inspectorate and Social Security: http://www.empleo.gob.es/itss/web/Documentos/ORGANISMO_ESTATAL/Doc_Organismo/Plan_Estrat_formato.pdf
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.7.2	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not supplied using any form of compulsory labour.
Finding	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. However, there are some concerns over civil rights in Spain, as set out in reports from international organisations like Amnesty International (see the 2017 report on Spain), but none of the concerns is directly related to the forestry sector. In 2014, the International Trade Union Confederation (ITUC) published a report on working conditions in 139 countries, carrying out a study using 97 internationally-recognised indicators. Spain was given a score of 2 on a scale of 1 to 5 (where 1 is the highest score). A score of 2 means that there are repeated violations of rights, and that those violations can affect improvements in working conditions ("Certain rights have come under repeated attack by governments and / or companies and have undermined the struggle for better working conditions."). Spain has long experience of fighting forced labour. It was 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 trafficking, 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. There is a Government of Spain Plan to fight illegal working and Social Security fraud. Labour inspectors form the Government-appointed authority to check labour and safety rights. Companies are inspected in respect of those matters, with violations being sanctioned and corrected. No relevant violations have been found of the laws on forced labour in relation to the forestry sector. Accordingly, the risk relating to the indicator is classified as low..
Means of Verification	- Existing legal framework and level of governance - Contracts of employment - Contracts with suppliers - Records of field inspections and monitoring - Interviews with workers
Evidence Reviewed	ILO Spain: http://www.ilo.org/madrid/oit-en-españa/lang-es/index.htm ILO Conventions: http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang-es/index.htm ILO Forced Labour Spain: http://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/forced-labour/WCMS_575880/lang-es/index.htm ITUC Global Rights Index: The world's worst countries for workers: http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf Spanish Constitution: https://www.boe.es/buscar/pdf/1978/BOE-A-1978-31229-consolidado.pdf Workers' Statue: https://www.boe.es/buscar/pdf/2015/BOE-A-2015-11430-consolidado.pdf Spanish Labour and Social Security Legislation: https://www.boe.es/legislacion/codigos/codigo.php?id=93&modo=1&nota=0&tab=2 Spanish Ministry of Employment and Social Security, Strategic Plan for the Labour Inspectorate and Social Security: http://www.empleo.gob.es/itss/web/Documentos/ORGANISMO_ESTATAL/Doc_Organismo/Plan_Estrat_formato.pdf
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.7.3	The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is not supplied using child labour.
Finding	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. However, there are some concerns over civil rights in Spain, as set out in reports from international organisations like Amnesty International (see the 2017 report on Spain), but none of the concerns is directly related to the forestry sector. In 2014, the International Trade Union Confederation (ITUC) published a report on working conditions in 139 countries, carrying out a study using 97 internationally-recognised indicators. Spain was given a score of 2 on a scale of 1 to 5 (where 1 is the highest score). A score of 2 means that there are repeated violations of rights, and that those violations can affect improvements in working conditions ("Certain rights have come under repeated attack by governments and / or companies and have undermined the struggle for better working conditions."). Article 6 "Child Labour" of the Workers' Statute specifies: 1. Persons aged under 16 must not enter the world of work. 2. 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. 3. Persons aged under 18 must not do overtime. 4. Persons aged under 18 can 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." There is a Government of Spain Plan to fight illegal working and Social Security fraud. Labour inspectors form the Government-appointed authority to check labour and safety rights. Companies are inspected in respect of those matters, with violations being sanctioned and corrected. No relevant violations are found of the laws on child labour in relation to the forestry sector.
Means of Verification	• Existing legal framework and level of governance • Contracts of employment • Contracts with suppliers • Records of field inspections and monitoring • Interviews with workers
Evidence Reviewed	ILO Spain: http://www.ilo.org/madrid/oit-en-españa/lang-es/index.htm ILO Conventions: http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang-es/index.htm ILO Forced Labour Spain: http://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/forced-labour/WCMS_575880/lang-es/index.htm ITUC Global Rights Index: The world's worst countries for workers: http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf Spanish Constitution: https://www.boe.es/buscar/pdf/1978/BOE-A-1978-31229-consolidado.pdf Workers' Statute: https://www.boe.es/buscar/pdf/2015/BOE-A-2015-11430-consolidado.pdf Spanish Labour and Social Security Legislation: https://www.boe.es/legislacion/codigos/codigo.php?id=93&modo=1&nota=0&tab=2 Spanish Ministry of Employment and Social Security, Strategic Plan for the Labour Inspectorate and Social Security: http://www.empleo.gob.es/itss/web/Documentos/ORGANISMO_ESTATAL/Doc_Organismo/PIan_Estrat_formato.pdf

Risk Rating	☒ Low Risk	☐ Specified Risk	☐ Unspecified Risk at RA
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	Indicator
2.7.4	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not supplied using labour which is discriminated against in respect of employment and occupation.
Finding	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. In 2014, the International Trade Union Confederation (ITUC) published a report on working conditions in 139 countries, carrying out a study using 97 internationally-recognised indicators. Spain was given a score of 2 on a scale of 1 to 5 (where 1 is the highest score). A score of 2 means that there are repeated violations of rights, and that those violations can affect improvements in working conditions ("Certain rights have come under repeated attack by governments and / or companies and have undermined the struggle for better working conditions."). Spain is well positioned in international reports: • a Corruption Perception Index score of 57. Perception of the level of corruption has increased noticeably in Spain over the last few years, although it remains clearly above 50, which means a relatively low level of perception; • The World Governance Indicators (WGIs) of the World Bank, with 2017 values of between 61.90 and 83.17 (1 – 100 points). The World Bank's WGI report has been prepared in 200 countries since 1996 and covers the following governance indicators: i) Voice and Accountability, ii) Political Stability and Absence of Violence / Terrorism, iii) Government Effectiveness, iv) Regulatory Quality, v) Rule of Law, and vi) Control of Corruption.) However, there are some concerns over civil rights in Spain, as set out in reports from international organisations like Amnesty International (see the 2017 report on Spain), but none of the concerns is directly related to the forestry sector. Spain does not appear in reports from international organisations (Global Witness, Human Rights Watch, Chatham House Illegal Logging portal) that cover activities relating to the forestry sector. According to information from Eurostat, Spain has a gender gap of 14.9% (the average gender salary gap in the EU is 16.3%). The gap continues to diminish; in 2002, it was 19%. In turn, the forestry and logging sector is the most masculinised, since just 6% of the people working in it are women. There is a Government of Spain Plan to fight illegal working and Social Security fraud. Labour inspectors form the Government-appointed authority to check labour and safety rights. Companies are inspected in respect of those matters, with violations being sanctioned and corrected. Based on available information, no evidence has been found to confirm relevant risks of employment discrimination in relation to the forestry sector. Accordingly, the risk relating to the indicator is classified as low.
Means of Verification	• Existing legal framework and level of governance • Contracts of employment • Contracts with suppliers • Records of field inspections and monitoring • Interviews with workers • Records of payments made
Evidence Reviewed	ILO Spain: http://www.ilo.org/madrid/oit-en-españa/lang-es/index.htm ILO Conventions: http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang-es/index.htm ITUC Global Rights Index: The world's worst countries for workers: http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf

	Spanish Constitution: https://www.boe.es/buscar/pdf/1978/BOE-A-1978-31229-consolidado.pdf Workers' Statute: https://www.boe.es/buscar/pdf/2015/BOE-A-2015-11430-consolidado.pdf Spanish Employment and Social Security Legislation: https://www.boe.es/legislacion/codigos/codigo.php?id=93&modo=1&nota=0&tab=2 Spanish Ministry of Employment and Social Security, Strategic Plan for the Labour Inspectorate and Social Security: http://www.empleo.gob.es/itss/web/Documentos/ORGANISMO_ESTATAL/Doc_Organismo/Plan_Estrat_formato.pdf Eurostat, the salary gap in Spain: ec.europa.eu/newsroom/just/document.cfm?doc_id=48113 https://elpais.com/elpais/2018/03/06/media/1520349163_919876.html https://politica.elpais.com/politica/2018/03/02/actualidad/1519999246_882483.html
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.7.5	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is supplied using labour where the pay and employment conditions are fair and meet, or exceed, minimum requirements.
Finding	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. In 2014, the International Trade Union Confederation (ITUC) published a report on working conditions in 139 countries, carrying out a study using 97 internationally-recognised indicators. Spain was given a score of 2 on a scale of 1 to 5 (where 1 is the highest score). A score of 2 means that there are repeated violations of rights, and that those violations can affect improvements in working conditions ("Certain rights have come under repeated attack by governments and / or companies and have undermined the struggle for better working conditions."). In Spain, the government holds consultations with the most representative trade-union organisations and business associations before setting the <i>Salario Mínimo Interprofesional</i> (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. The value set for 2018 is 735.90 euros per month. Collective-bargaining agreements usually exist, with remuneration and conditions for the sector's workers. Employment conditions are set out in the Workers' Statute. There is a Government of Spain Plan to fight illegal working and Social Security fraud. Labour inspectors form the Government-appointed authority to check labour and safety rights. Companies are inspected in respect of those matters, with violations being sanctioned and corrected. Integra Fuels has put in place a system with the documentation that it requests from its subcontractors, i.e. those companies that carry out forestry work / forestry use under contract to Integra Fuels. In that system, subcontractors must provide Integra Fuels, for the purposes of verification, all documentation relating to the workers' employment conditions, including forms TC1 and TC2, which are evidence of payment of salaries and of being registered with the social-security system. According to the information available in respect of working conditions, Spain has a legal framework and authorities that ensure compliance with it. Accordingly, the risk relating to the indicator is classified as low.
Means of Verification	- Existing legal framework and level of governance - Contracts with suppliers - Records of field inspections and monitoring - Interviews with workers - Forms TC1 and TC2

Evidence Reviewed	ILO Spain: http://www.ilo.org/madrid/oit-en-españa/lang-es/index.htm ILO Conventions: http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang-es/index.htm ITUC Global Rights Index: The world's worst countries for workers: http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf Spanish Constitution: https://www.boe.es/buscar/pdf/1978/BOE-A-1978-31229-consolidado.pdf Worker's Statute: https://www.boe.es/buscar/pdf/2015/BOE-A-2015-11430-consolidado.pdf Spanish Employment and Social Security Legislation: https://www.boe.es/legislacion/codigos/codigo.php?id=93&modo=1&nota=0&tab=2 Spanish Ministry of Employment and Social Security, Strategic Plan for the Labour Inspectorate and Social Security: http://www.empleo.gob.es/itss/web/Documentos/ORGANISMO_ESTATAL/Doc_Organismo/Plan_Estrat_formato.pdf Royal Decree 1077 / 2017 of 29 December setting the minimum wage for 2018: https://www.boe.es/boe/dias/2017/12/30/pdfs/BOE-A-2017-15848.pdf Spanish Ministry of Employment and Social Security, Labour Guide: http://www.empleo.gob.es/es/Guia/texto/guia_6/contenidos/guia_6_13_2.htm Integra Fuels, health and safety documentation for subcontracts
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.8.1	The Biomass Producer 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).
Finding	In Spain, Health and Safety at Work is extensively regulated by a range of legislation. That legislation covers all activities relating to the forestry sector, such as personal protection equipment, using machinery, etc. Risk assessment is a basic process for actively managing health and safety at work. The assessment procedure is needed to plan preventive action and to choose work teams, techniques, and work-organisation systems. Law 31 / 1995 of 8 November on Preventing Occupational Risks (BOE (<i>Boletín Oficial del Estado</i> - Spanish Government Gazette) of 10/11/1995) establishment Assessment of Occupational Risks as the instrument or "process aimed at estimating the size of risks that could not be avoided, which will provide the information needed for the businessperson to take the most suitable measures for planning prevention in the business". The businessperson will organise the resources needed for developing preventive action in accordance with the following methods: - o taking personal charge of preventive activity; - o appointing one or more workers to carry it out; - o setting up an in-house prevention service; - o setting up a joint prevention service; - o using an external prevention service. Unless they are required by their size or by legislation to have an in-house prevention service, most businesses enter into a contract with an external prevention service that undertakes to carry out the occupational-risk assessment of the business, implement the measures needed to minimise them, and provide the business's workers with appropriate training. That is the case with Integra Fuels, which has a prevention-service contract with the firm Quirón Prevención, S.L.U. The following graph shows changes in statistics relating to accidents at work in Spain:

**ACCIDENTES DE TRABAJO CON BAJA EN JORNADA
VALORES ABSOLUTOS**
Evolución 2002 – 2016

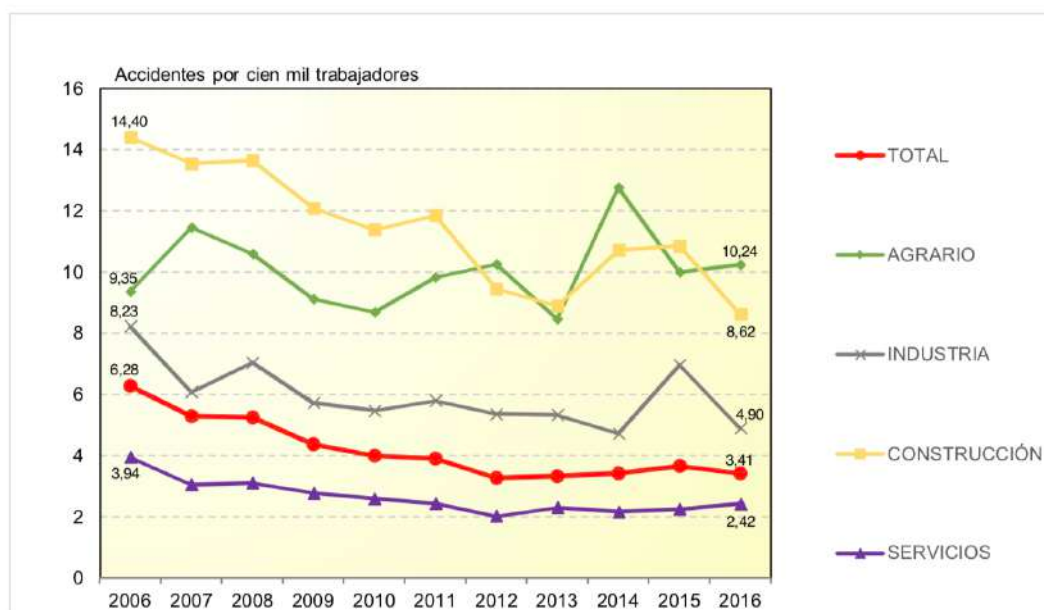


A clear downward trend is observed in the total number of accidents at work, even with the sustained rise over the last four years. Moreover, during the whole of that period, the relationship between fatal accidents and the total number of accidents with sick absence remains close to one fatal accident for every 1,000 accidents with sick absence.

On a sectoral basis, in 2016, the construction sector showed the highest level of incidence, with 7,217.2 accidents with sick absence per 100,000 workers. Next comes the industrial sector, with 5,290.8, followed by the agricultural sector, with 5,143.4 accidents per 100,000 workers.

As regards the incidence of fatal accidents, the following graph shows the change over the period from 2006 to 2016 by sectors of activity. The construction and agricultural sectors show the highest levels of incidence for the entire period; in 2016, the agricultural sector reached an incidence level of 10.24 fatal accidents per working day per 100,000 workers, with the level for the construction sector being 8.62.

**ÍNDICES DE INCIDENCIA POR SECTOR DE ACTIVIDAD
ACCIDENTES DE TRABAJO MORTALES EN JORNADA**
Evolución 2006 – 2016



In addition, it can be seen that the agricultural sector, which includes forestry, is the only one to show an increase in the incidence of fatal accidents since 2006.

	A more specific study of the forestry sector shows that 50% of forestry-related accidents occur in surveying work and when using chainsaws. In addition, the forestry and logging sector has one of the highest rates of accidents at work. Labour inspectors form the Government-appointed authority to check labour and safety rights. The logging sector is taken into consideration when scheduling work inspections and plans specific to the sector are in existence. Companies are inspected in respect of those matters, with violations being sanctioned and corrected. As has been stated, Integra Fuels has an external prevention service (Quirón Prevención, S.L.U.), so it has workstation-based risk assessment as well as a full set of safety documentation, which includes a description by type of work (surveying, loading, unloading, clearing, removal, processing, etc.) of the operational practices of the system for preventing occupational risks, and handing over personal protective equipment appropriately signed for by its workers. In turn, Integra Fuels has a system for collecting from its subcontractors and suppliers all the information needed to ensure compliance with current legislation in matters of Health and Safety at Work (certificate of medical fitness, certification of training and information in relation to Preventing Occupational Risks, certificate of issuing protective personal equipment, etc.). For work on public forests, the public administration appoints a Health and Safety Co-ordinator who ensures that all documentation is in order and that field work is carried out in compliance with legal requirements. Given that: - Spain has a clear legal framework and effective labour inspections, - Integra Fuels has implemented a system to ensure that it, its subcontractors, and its suppliers comply with legislation on Health and Safety at Work, and - Integra Fuels has instructions on operational practices of the System for Preventing Occupational Risks, and that specify the various tasks to be carried out in its forestry activity, the risk relating to this indicator is classified as: - low in respect of work done in public forests, and - specified in reference to accidents at work in relation to forestry improvement / forestry carried out in public forests.
Means of Verification	- Existing legal framework and level of governance - Record of courses on preventing occupational risks and safety at work - Record of training carried out - Record of provision of personal protection equipment - Field inspections - Risk assessment - Interviews with staff
Evidence Reviewed	Law 31 / 1995 on Preventing Occupational Risks: https://www.boe.es/buscar/pdf/1995/BOE-A-1995-24292-consolidado.pdf Royal Decree 39 / 1997 approving the Prevention Services Regulation: https://www.boe.es/buscar/pdf/1997/BOE-A-1997-1853-consolidado.pdf Spanish Ministry of Health and Social Security, Labour Guide to Preventing Occupational Risks: http://www.empleo.gob.es/es/guia/texto/guia_10/contenidos/guia_10_22_2.htm Spanish Employment and Social Security Legislation: https://www.boe.es/legislacion/codigos/codigo.php?id=93&modo=1&nota=0&tab=2 Spanish Ministry of Employment and Social Security, Statistics on Accidents at Work, 2016: http://www.empleo.gob.es/estadisticas/eat/eat16/Resumen_resultados_ATR_2016.pdf Spanish Ministry of Employment and Social Security, Strategic Plan for the Labour Inspectorate and Social Security: http://www.empleo.gob.es/itss/web/Documentos/ORGANISMO_ESTATAL/Doc_Organismo/Plan_Estrat_formato.pdf Risk-Prevention in Forestry Work: http://www.insht.es/SectorAgrario/Contenidos/ficheros/PRL%20en%20actividad%20forestal.pdf ILO, Health and Safety in Forestry Work: http://www.ilo.org/wcmsp5/groups/public/---ed_protect/---protrav/---safework/documents/normativeinstrument/wcms_112615.pdf

	Integrated Work Inspection Plan, 2016: http://www.empleo.gob.es/itss/ITSS/ITSS_Descargas/Atencion_ciudadano/Planificacion_actuaciones/actas-planos/PLAN_INTEGRADO_2016.pdf
Risk Rating	☐ Low Risk ☒ Specified Risk ☐ Unspecified Risk at RA
Comment or Mitigation Measure	Integra Fuels has implemented a system that covers all the aspects to be taken into consideration to ensure compliance with legislation on Preventing Occupational Risks as well as on Health and Safety at Work. The system covers its own workers as well as its subcontractors and suppliers. The system ensures that the following minimum information is available for verification: • External Prevention-Service Contract and receipt for payment thereof (COMPANY) • Civil-liability policy and update receipt for payment thereof (COMPANY AND SELF-EMPLOYED) • Accident-insurance policy and updated receipt for payment thereof (COMPANY) • Designation of Preventive Resource, in case of need (COMPANY) • Photocopies of forms TC1 and TC2, or of registration with Social Security for workers (SELF-EMPLOYED) • Photocopy of receipt for Social Security payments (SELF-EMPLOYED) • Certificate of fitness following Medical Examination (COMPANY AND SELF-EMPLOYED) • Certificates relating to Training and Information needed in relation to Preventing Occupational Risks (COMPANY) • Certificates of requisite personal protective equipment having been issued to workers (COMPANY) • CE mark certificate or bringing machinery into compliance pursuant to Royal Decree 1215 / 97 (COMPANY AND SELF-EMPLOYED) • Record of updated machinery maintenance (COMPANY AND SELF-EMPLOYED) • ITV (<i>Inspección Técnica de Vehículos</i> – Technical Inspection of Vehicles) sheet (COMPANY AND SELF-EMPLOYED) • Registration certificate (registered machinery) (COMPANY AND SELF-EMPLOYED) • Compulsory receipt for vehicle insurance (registered machinery) (COMPANY AND SELF-EMPLOYED) • Photocopy of driving licence of authorised persons (registered machinery) (COMPANY AND SELF-EMPLOYED) • In case of accident, INTEGRA FUELS, S.L., must be informed immediately. In addition, Integra Fuels has a Manual of Best Practices in Forestry that has been developed and implemented. The manual describes all types of forestry work, how to approach it, the necessary preventive safety measures, and action to be taken in case of accident or emergency. Integra Fuels certifies its workers' training in that respect. Subcontracted companies and suppliers must have a Manual of Best Practices in Forestry and certify its implementation or use Integra Fuels' manual. Integra Fuels also collects information on accidents at work that occur during work for which it and its suppliers are liable, analyses the causes, and takes the measures needed to avoid recurrence. The system includes the need for field inspections in the event of a systematic increase in accidents at work that occur during work covered by the scope of the certification. Finally, and in order to mitigate risk, Integra Fuels has designed an approval system for companies that work for the firm, in order to assess their performance in terms of Health and Safety in the forestry work that they carry out. The approval system consists of a system of visits by Integra Fuels staff (whether the head of forestry or individual area managers), with a checklist-based assessment of how work is being done and of the measures for avoiding accidents or impacts. A system is also set up to inform companies of non-compliance and to set a scale with an associated ranking, so that companies with the lowest scores will be inspected more frequently than companies with the best scores.

The system that has been rolled out is considered complete and sufficient to ensure the use of safety measures and equipment during forestry work, and to mitigate risks relating to accidents at work.

	Indicator																																																																																																																																																																						
2.9.1	Biomass is not sourced from areas that had high carbon stocks in January 2008 and no longer have those high carbon stocks.																																																																																																																																																																						
Finding	According to data provided by MAPAM (<i>Ministerio de Agricultura, Pesca, Alimentación, y el Medio Ambiente</i> - Ministry of Agriculture, Fisheries, Food, and the Environment, Spain) in the 2018 Inventory of Greenhouse-Gas Emissions, with data covering the 1990-2016 series, forested lands and woodland management form the largest carbon sink, with values that have remained more or less stable since 1990. On an annual basis, they absorb about 39,000 Gg CO₂-eq. That use is still an increase in the biomass and in Spain's remaining carbon stocks, and it forms the largest national sink. <i>Tabla RE.2.2.- Evolución de las absorciones netas en LULUCF</i> <i>Valores absolutos (cifras en Gg CO₂-eq)</i> <table><tr><th>1990</th><th>1995</th><th>2000</th><th>2005</th><th>2007</th><th>2008</th><th>2009</th></tr><tr><td>-39.350</td><td>-36.544</td><td>-42.971</td><td>-41.371</td><td>-40.312</td><td>-39.813</td><td>-39.511</td></tr><tr><th>2010</th><th>2011</th><th>2012</th><th>2013</th><th>2014</th><th>2015</th><th>2016</th></tr><tr><td>-40.450</td><td>-38.902</td><td>-36.163</td><td>-38.562</td><td>-41.543</td><td>-42.007</td><td>-40.744</td></tr></table> <i>Índice de evolución anual (año 1990 = 100)</i> <table><tr><th>1990</th><th>1995</th><th>2000</th><th>2005</th><th>2007</th><th>2008</th><th>2009</th></tr><tr><td>100,0%</td><td>92,9%</td><td>109,2%</td><td>105,1%</td><td>102,5%</td><td>101,2%</td><td>100,4%</td></tr><tr><th>2010</th><th>2011</th><th>2012</th><th>2013</th><th>2014</th><th>2015</th><th>2016</th></tr><tr><td>102,8%</td><td>98,9%</td><td>91,9%</td><td>98,0%</td><td>105,6%</td><td>106,8%</td><td>103,6%</td></tr></table> As shown in the following graph, 10,300 Gg CO₂-eq come from forestation and 28,500 Gg CO₂-eq from woodland management. <i>Tabla RE.2.4.- Emisiones (+) y absorciones (-) en las actividades LULUCF-KP (Gg CO₂-eq)</i> <table><tr><th></th><th>1990</th><th>2008</th><th>2009</th><th>2010</th><th>2011</th><th>2012</th><th>2013</th><th>2014</th><th>2015</th><th>2016</th></tr><tr><td>A. Actividades artículo 3.3</td><td>NA</td><td>-12.732</td><td>-12.661</td><td>-12.724</td><td>-12.365</td><td>-11.794</td><td>-12.077</td><td>-11.582</td><td>-10.678</td><td>-9.743</td></tr><tr><td>A.1. Forestación/Reforestación</td><td>NA</td><td>-13.431</td><td>-13.357</td><td>-13.351</td><td>-12.991</td><td>-12.422</td><td>-12.646</td><td>-12.145</td><td>-11.239</td><td>-10.302</td></tr><tr><td>A.2. Deforestación</td><td>NA</td><td>699</td><td>697</td><td>627</td><td>627</td><td>628</td><td>569</td><td>563</td><td>561</td><td>559</td></tr><tr><td>B. Actividades artículo 3.4</td><td>-870</td><td>-26.049</td><td>-25.978</td><td>-27.015</td><td>-25.958</td><td>-23.905</td><td>-26.166</td><td>-29.744</td><td>-31.223</td><td>-31.003</td></tr><tr><td>B.1. Gestión bosques</td><td>NA</td><td>-29.091</td><td>-26.963</td><td>-27.158</td><td>-26.893</td><td>-26.370</td><td>-26.832</td><td>-27.957</td><td>-28.944</td><td>-28.557</td></tr><tr><td>B.2. Gestión tierras agrícolas</td><td>-870</td><td>3.042</td><td>986</td><td>143</td><td>935</td><td>2.464</td><td>666</td><td>-1.787</td><td>-2.279</td><td>-2.446</td></tr><tr><td>B.3. Gestión de pastizales</td><td></td><td></td><td></td><td></td><td></td><td>NA</td><td></td><td></td><td></td><td></td></tr><tr><td>B.4. Revegetación</td><td></td><td></td><td></td><td></td><td></td><td>NA</td><td></td><td></td><td></td><td></td></tr><tr><td>B.5. Drenaje y rehúmedación de humedales</td><td></td><td></td><td></td><td></td><td></td><td>NA</td><td></td><td></td><td></td><td></td></tr></table> Hence, the data lead to the conclusion that there are two carbon sinks linked to forested lands: 1. reforestation, which has been carried out for decades in Spain, with the trend being downwards because the increase in forest area is stabilising with time; 2. forest management, which is carried out across the whole country and which, since 1990, has remained stable, with similar carbon-absorption values. Conversely, studies indicate that in Spain, the amount of carbon stored in the soil is determined in large measure by climate and by vegetation type. Wetter areas in the north store more carbon the soil than drier areas in the south and east. On average, every m² of soil has 8.7 kg of carbon trapped in it. That value can vary from 6.5 kg to 11.6 kg, depending on the area. Under the forested soil of Asturias, Galicia, Cantabria, and the Basque Country,	1990	1995	2000	2005	2007	2008	2009	-39.350	-36.544	-42.971	-41.371	-40.312	-39.813	-39.511	2010	2011	2012	2013	2014	2015	2016	-40.450	-38.902	-36.163	-38.562	-41.543	-42.007	-40.744	1990	1995	2000	2005	2007	2008	2009	100,0%	92,9%	109,2%	105,1%	102,5%	101,2%	100,4%	2010	2011	2012	2013	2014	2015	2016	102,8%	98,9%	91,9%	98,0%	105,6%	106,8%	103,6%		1990	2008	2009	2010	2011	2012	2013	2014	2015	2016	A. Actividades artículo 3.3	NA	-12.732	-12.661	-12.724	-12.365	-11.794	-12.077	-11.582	-10.678	-9.743	A.1. Forestación/Reforestación	NA	-13.431	-13.357	-13.351	-12.991	-12.422	-12.646	-12.145	-11.239	-10.302	A.2. Deforestación	NA	699	697	627	627	628	569	563	561	559	B. Actividades artículo 3.4	-870	-26.049	-25.978	-27.015	-25.958	-23.905	-26.166	-29.744	-31.223	-31.003	B.1. Gestión bosques	NA	-29.091	-26.963	-27.158	-26.893	-26.370	-26.832	-27.957	-28.944	-28.557	B.2. Gestión tierras agrícolas	-870	3.042	986	143	935	2.464	666	-1.787	-2.279	-2.446	B.3. Gestión de pastizales						NA					B.4. Revegetación						NA					B.5. Drenaje y rehúmedación de humedales						NA				
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	in that order, lie Spain's highest stocks of carbon per m² (they represent the fresher, wetter Atlantic areas). On the other hand, Murcia, Extremadura, and Andalusia are the communities that trap the least amount of carbon per m² in their forested soils (they represent the driest and hottest areas, with more typically Mediterranean vegetation). Taking all that into account, as well as the fact that the work done by Integra Fuels does not affect mature masses that may run the risk of disappearing because of inadequate management, the risk relating to this indicator is classified as low.
Means of Verification	- Existing legal framework - Information available: maps, web sites, statistics - Procedures and records relating to carbon storage - Interviews with experts
Evidence Reviewed	MAPAMA: - Carbon sinks: http://www.mapama.gob.es/es/cambio-climatico/temas/mecanismos-de-flexibilidad-y-sumideros/sumideros-de-carbono/ - Spanish emission-inventory system: http://www.mapama.gob.es/es/calidad-y-evaluacion-ambiental/temas/sistema-espanol-de-inventario-sei/ - National Inventory of Greenhouse Gases (GHGs): http://www.mapama.gob.es/es/calidad-y-evaluacion-ambiental/temas/sistema-espanol-de-inventario-sei/Inventario-GEI.aspx 2018 Inventory of greenhouse-gas emissions_summary 2018 Inventory of greenhouse-gas emissions Soil carbon stocks and their variability across the forests, shrublands, and grasslands of peninsular Spain: https://www.biogeosciences.net/10/8353/2013/bg-10-8353-2013.pdf
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.9.2	Analysis demonstrates that feedstock harvesting does not diminish the capability of the forest to act as an effective sink or store of carbon over the long term.
Finding	According to the data given in indicator 2.9.1, Spanish forests maintain stability as carbon sinks linked to forestry management that was carried out in them during the entire period from 1990 to 2016. Accordingly, the risk relating to this indicator is classified as low.
Means of Verification	- Existing legal framework - Information available: maps, web sites, statistics - Results of analysis of carbon storage - Data from the historical series
Evidence Reviewed	MAPAMA: - Carbon sinks: http://www.mapama.gob.es/es/cambio-climatico/temas/mecanismos-de-flexibilidad-y-sumideros/sumideros-de-carbono/ - Spanish emission-inventory system: http://www.mapama.gob.es/es/calidad-y-evaluacion-ambiental/temas/sistema-espanol-de-inventario-sei/ - National Inventory of Greenhouse Gases (GHGs): http://www.mapama.gob.es/es/calidad-y-evaluacion-ambiental/temas/sistema-espanol-de-inventario-sei/Inventario-GEI.aspx 2018 Inventory of greenhouse-gas emissions_summary 2018 Inventory of greenhouse-gas emissions Soil carbon stocks and their variability across the forests, shrublands and grasslands of peninsular Spain: https://www.biogeosciences.net/10/8353/2013/bg-10-8353-2013.pdf

Risk Rating	☒ Low Risk	☐ Specified Risk	☐ Unspecified Risk at RA
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	Indicator
2.10.1	Genetically modified trees are not used.
Finding	There is no legal prohibition on using genetically-modified material, but there is a legal framework that regulates its use, for which it is necessary to obtain a government licence. There is the <i>Comisión Nacional de Bioseguridad</i> (National Commission on Biodiversity, Spain), which, “pursuant to the provisions of the second additional provision of Law 9 / 2003, is a collegiate body that is consultative in nature and of which the function is to inform on authorisation requests presented to the State General Administration and to the Autonomous Communities in respect of genetically-modified organisms (contained use, voluntary release, and marketing). It comes under the Spanish Ministry of Agriculture, Fisheries, Food, and the Environment, and it is made up of representatives of the various Ministries involved, representatives of the Autonomous Communities, as well as subject-matter expert persons and institutions.” There is also a Public Register of Genetically-Modified Organisms that “is set up pursuant to Royal Decree 178 / 2004 of 30 January, which approves the General Regulation for the Implementation and Execution of Law 9 / 2003, in its first additional provision, pursuant to the third additional provision of the said law. It is enriched by such data as are available, by reason of their competence, to the Spanish Interministerial Council on Genetically-Modified Organisms, the National Commission on Biosecurity, the ministerial departments that are competent in the matter, and the competent bodies of the Autonomous Communities, as well as data arising from handling communications and authorisation requests for the contained use, voluntary release, and marketing of genetically-modified organisms.” There are no records and there is no evidence of use of genetically-modified organisms in the forestry context. Based on the foregoing, the risk relating to this indicator is classified as low.
Means of Verification	Existing legal framework. Laws, regulations, and control bodies.
Evidence Reviewed	Legislation on Genetically-Modified Organisms (GMOs): http://www.mapama.gob.es/es/calidad-y-evaluacion-ambiental/temas/biotecnologia/organismos-modificados-geneticamente-omg-/legislacion-general/ National Commission on Biosecurity: http://www.mapama.gob.es/es/calidad-y-evaluacion-ambiental/temas/biotecnologia/organismos-modificados-geneticamente-omg-/comision-nacional-bioseguridad/ Public Register of GMOs: http://www.mapama.gob.es/es/calidad-y-evaluacion-ambiental/temas/biotecnologia/organismos-modificados-geneticamente-omg-/registro-publico-OMG/
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA