

Supply Base Report (SBR)

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Completed in accordance with the Supply Base Report Template Version 1.3

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

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1 Overview

Producer name: Pelletsfirst – Produção e Comercialização de Pellets de Madeira, SA

Producer location: Zona Industrial Casal da Areia, Rua B. Lote 81, 2460 – 396 Cós

Geographic position: + 39º 36' 14'' Lat
– 8º 59' 19'' Lon

Primary contact: Sílvia Jorge
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email: qualidade@pelletsfirst.pt

Company website: <http://www.enerpellets.pt/>

Date report finalised: 18/10/2019

Close of last CB audit: 16/11/2018

Name of CB: Control Union Certifications BV

Translations from English: Yes

SBP Standard(s) used: Standard 1 version 1.0, Standard 2 version 1.0, Standard 4 version 1.0, Standard 5 version 1.0

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

SBP Endorsed Regional Risk Assessment: not applicable

Weblink to SBE on Company website: <http://www.enerpellets.pt/pdf/supplybase.pdf>

Indicate how the current evaluation fits within the cycle of Supply Base Evaluations				
Main (Initial) Evaluation	First Surveillance	Second Surveillance Audit (Scope extension audit for SBE)	Third Surveillance	Fourth Surveillance
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2 Description of the Supply Base

2.1 General description

The Enerpellets Group has its origin from an initiative coming from a group of professionals highly experienced in the management of companies. This group identified an export opportunity in the value chain of thermal and electrical production.

The Enerpellets Group is active in the energy business as a competent producer of renewable biomass, wood pellets. The Group has two industrial units located in Pedrogão Grande and Alcobaça, both units situated in the District of Leiria.

The geographical position of both these plants is mainly due to a strategic option. Both plants are situated in the largest forested area in Portugal which is a guarantee for a good and sustainable supply of raw material.

The unit is located in Alcobaça (Pelletsfirst), begun its production on October 2012 and since March 2013 is certified for the production of premium wood pellets (Enplus A₁).

The annual production capacity for this plant is 140.000 tons. The final product will be supplied as bulk, in bags or in big-bags. Since part of the production is shipped by sea the port of Figueira da Foz has been selected being relatively close to the production site in Alcobaça.

The transport of pellets from the plant to the port of Figueira da Foz is guaranteed by truck on excellent highways.

Pelletsfirst has a selected set of equipment, widely tested in this kind of industry, Moreover the equipment was internally improved and developed in many details by the Group's own engineering department.

For feedstock, the company purchases roundwood and forest residues from the logging process, and sawmills residues like wood chips, slabwood and sawdust, mainly of Pine (*Pinus pinaster* and *Pinus pinea*) and in a little proportion, roundwood of Eucalyptus (*Eucalyptus globulus*) Acácia (*Acacia* spp) and Poplar (*Populus* spp) .

For the drying process in the production process, besides biomass like pine residuos (peel, bark and branches), are also used roundwood and biomass from Eucalyptus and to a lesser extent Acacia and Poplar.

The forest material (Primary feedstock) is provided by approximately 160 small and medium-sized companies, informed and controlled in order to have the necessary information about the management unit of the sourced material. Furthermore each one of these companies declares in writing their commitment for this purpose.

All of the primary feedstock comes from forest areas in Portugal, mainly located in the districts of Aveiro, Beja; Castelo Branco, Coimbra; Évora, Leiria; Lisboa; Portalegre, Santarém e Setúbal.

Suppliers purchase standing wood and make the selection of round wood for higher value-added processes like saw mills (*Pinus spp*), wood pulp industries (*Eucalyptus globulus*). The harvest residues are destined for other processes giving economical value to this kind of woody material, including the manufacturing of wood pellets, energy production, and MDF chipboard.

This practice is encouraged by the company, including a supply policy to promote the good use and the sustainability of forest resources. The reception of roundwood is limited to diameters ≤ 40 cm, except in the cases of defective pieces without any possibility for use for in demanding value-added processes.

The Secondary feedstock (wood chips, slabs and sawdust) are provided from about 14 sawmills, who in their turn also supply wood from forested areas in Portugal. The main part of this material usually comes from surrounding forested areas, but, in the limit, may come from any region of the country.

Portuguese Forest

Portugal has approximately 9, 8 million of inhabitants and 8, 7 million hectares of territorial land area.

According to data of the last National Forest Inventory (IFN6 – Principais resultados – relatório sumário, ICNF, 2019.), forest, which includes wooded and temporarily not wooded land (cut, burned and regenerating) is the main national land use (36%), representing one of the largest proportions of forested areas in Europe.

The forest of the continent alarea is dominated by native species, highlighting the oaks (including cork oak and holm oak, about 36% of the total) and pine trees (about 30%). Eucalyptus plantations occupy 26% of the forest area and the rest of the area is distributed by species of lower expression (including *Castanea sativa*, *Arbutus unedo*, *Ceratonia siliqua*, *Acacia spp*, *Poplars*, and others).

National Forest Inventory (IFN6) also presents the following conclusions:

- Forest areas covers 6.1 million hectares (69.4%) of the continental national territory;
- The reducing trend of the forest area, which has been in place since 1995, was reversed in 2015, with an increase of 59.000 ha (1.9%) since 2010 (date of the last Inventory);
- The national forest is mostly composed of native species (72%), some occupying territories larger than their original;
- In structural, functional and landscape terms, the forest of the continent can be organized into four large groups: pine forests (Maritime Pine - *Pinus pinaster* and Umbrella Pine - *Pinus pinea*); perennial hardwoods (cork oak and holm oak); deciduous hardwoods (oaks, chestnut trees and others); and industrial hardwood plantations (*Eucalyptus spp.*);

- The "montado" (perennial hardwoods - cork oak and holm oak) are the main forest occupation, with about 1 million hectares and representing a 1/3 of forest area. Are multi-use forest ecosystems, which do not have wood production as the main function;
- Pine forests are the second forest occupation, with an area close to 1 million hectares, with the greatest reduction in the occupied area. The reduction is caused by forest fires and diseases (Mainly the Nematode). However, in the period between 2010 and 2015, the area of, recorded a very significant slowdown in the rate of reducing trend that occurred since 1995 (IFN4), which reveals the extraordinary resilience of these pine forests to disturbances;
- Deciduous hardwood (oaks, chestnut trees and others) are the least representative forest occupation, although there has been a systematic increase over the last 20 years, which is most significant in the period between the last two inventories (2005 and 2015) (46,000 ha; 17%);
- Eucalyptus plantations occupy 844,000 ha, about 26% of the continental forest area and presenting a systematic increase over the last 50 years;
- In 2015, Portugal had 172 million m³ of growing wood, an identical value to what occurred in IFN5 (2005).
- The maintenance of timber volumes between the last two inventories shows that in this period forest production, overall, can be considered sustainable, as wood cuts and losses by fires or pests have been in balance with forest growth. However, this analysis carried out for the main species with woody use reveals a distinct situation;
- The growing wood volume (i.e. of live trees) of Maritime Pine shows a decrease of 15 Mm³ compared to the previous IFN, in 2015 in the 67 Mm³. The volume of eucalyptus growing wood remains constant since the IFN5 (44 Mm³), despite the area increase of about 58,000 ha. That is, the availability of Maritime Pine is decreasing and eucalyptus wood does not follow its increase in area;
- In terms of wood biomass and carbon stored in living trees in forest areas, there is an increase in both values, resulting from the change in the specific composition of the forest, and partly from the improvement of evaluation methods;
- IFN6 characterizes the state of the forest in 2015 which is necessarily different from its current situation, as a result of the dynamics of forest ecosystems and, in particular, severe rural fires of 2017 and 2018 (Monchique). The impact of these disturbances and the dynamics of deforestation/reforestation and exploitation of resources will be properly assessed in the next IFN, which is scheduled for the start of next year. However, it is possible to make approximate estimates of the consequences of these rural fires on the basis of existing IFN6 data and affected areas. Thus, it is estimated that these fires have affected a forest area of 274,000 ha.

According to “Estratégia Nacional para as Florestas” (National Forestry Strategy), the forest property in Portugal is mostly private, covering 2,8 million ha. Small landholders own 84.2% of the total forested area. These properties are often family-oriented and only 6.5% of the forest land is owned by industrial companies. The Public Forest Estates correspond to 15.8% of the total forest land and only 2% (the lowest percentage in Europe) is directly owned by the State.

The size of the forest property has a very much defined geographical distribution. The largest number of properties is situated in the north and central part of Portugal. In these parts the size of a property is less than one hectare many times. It is estimated that there are over 400 000 forest owners in the country.

According to a study in 2013 (Estudo Prospectivo e Visão) published by AIFF (Competitiveness and Technology Center for the Forest Industries), the size of the properties is a key factor in the context for the Portuguese forest, with important repercussions on the activity regarding profitability and sustainability. In the north and the centre of the country around 54% of the forest area belongs to holdings with less than 10 hectares. The small size of the property is of particular relevance for the two main species whose distribution and exploitation areas are in the Central and Northern regions:

- Maritime Pine - *Pinus Pinaster*: 63% is situated in woodlands with holdings less than 10 ha and 25% less than 2 ha;
- *Eucalyptus* spp: 50% is situated in woodlands with holdings less than 10 ha.

According to the same study, the business structure in Portugal for the forest industry has some of the most representative European companies in the sector. From an international perspective of the transactions of forest products, the most important are: paper and paperboard, cork, furniture, wood and resin products.

The wood based industries, in particular the subsectors for resinous wood for industrial purposes and the resinous wood for sawing, essentially rely on the production of Maritime Pine. The pulp, paper and paperboard industry are based mainly on Eucalyptus production.

According to the “Relatório de Caracterização da Fileira Florestal” published in 2014 (A characterization of the Portuguese Forest Industry by AIFF, Competitiveness and Technology Center for the Forest Industries), the forest sector presented a positive trade balance of 2,474,000,000 Euros in 2013. This value represents 9.1% of the total national exports of goods and 3.4% of the total national imports of goods. Forest industry occupies 2.2% of the total number of employees in Portuguese companies and 1.7% of the total occupied population.

Analysing the production of goods from the forest sector allows us to observe trends. The production of pine (coniferous wood for industrial purposes) presents a decrease of 3.6% in value since 2011 and, for the year 2002, a decline of 4.5%. In 2012, the production value of sawed wood was lower than the previous year (- 2.3%) as a result of reduced prices (- 2.6%), though the volume increased (+0.4%), for the third consecutive year.

The production of Eucalyptus (hard wood for process) maintained its growing trend (only interrupted in 2009), showing an total increase of 63.4% and compared with previous year (2013), an increase of 9.2%. This high production increase for eucalyptus wood for industrial use turns Eucalyptus to the main forest asset (36,8%) almost 17 % higher than the production of resinous wood for industrial purposes.

According to AIFF in 2012, the gross value added (GVA) for forestry products showed an increase of 3.9% in volume and 2.4% in value, compared to 2011. There was also an 4,3 % increase in volume and 3,6 % in value in relation to the forestry production during the same period. In 2012 the GVA of the forest industry accounted for 1.2% of the national GVA, having maintained a significant weight among all the manufacturing industries (about 11%).

The analysis of the VAB by sector reveals a particular negative impact on the timber industries in recent years. The VAB value has been reduced by approximately 40% between 2007 and 2012 (- 429 1,000,000 Euros). This value is much higher than the values recorded for the sector of pulp and paper, paperboard and wood articles (- 4%). However considering the whole period (2004-2012), this segment reports a GVA growth.

According to Centro PINUS (Association for the development of the Pine Forest), as to recently published data from the INE (National Institute of Statistics), the turnover for pine wood industrial companies in 2018 was 4.137 million Euros, representing an increase of 6% compared to 2017. The pine wood industries maintain a turnover of 46% of the wood manufacturing sector in Portugal. This is evidence as good as any for the powerful dynamism and economic importance of the pine wood industries in Portugal.

According to Pedro Sebastião Perestrelo de Souza e Holstein Campilho in his thesis “Assessment of National Potential for Forest Biomass Utilization for Energy Purposes” published in 2010, the trend of loss of socioeconomic sustainability for the Portuguese forestry sector in recent years, when supported with measurements to encourage the production of renewable energy, transforms this situation into a set of developments increasing the demands for biomass from logging residues for energy use. The demand for biomass tends to be met in the short term, in scenarios more or less sustainable. However, in the medium and long term projection, and without considering significant increases in the demand for this resource, the result will be difficulties to meet existing market demands and to secure sustainability as those observed in the short term.

The pine forest is distributed throughout the Portuguese territory. Maritime Pine occupies 22% of the continental forested area, mostly located in the small holdings. Umbrella Pine occupies 6% of the total forest area of the Portuguese mainland, with main distribution area in the South of the country.

The forests composed of Maritime Pine (*Pinus pinaster*) are normally maintained as high growing trees and are regenerated naturally by sowing or planting.

The work operations initially intend to gradually reduce the density of plants from 1200 to 1600 trees/ha when applying natural regeneration and sowing. In the beginning in rows and then selectively by harrowing or mechanical or manual trimming. After 10 years the first pruning can be done (1 to 2) and thinning (2 to 3). The cut material is used and the final cut is done after 30-40 years, corresponding to about 500 to 600 trees/ha. The spontaneous vegetation along the growth process is controlled by harrowing or mechanical or manual trimming. When using natural regeneration approximately 25 large trees/ha are left as a seed source.

In case of planting, the soil is prepared with harrowing, ripping or by sub soiling. If the area is sloping > 30% the preparation and planting is manually done. The planting density depends on the quality of the site; 1200 to 1600 trees/ha. After 10 years the first pruning can be done (1 to 2) and thinning (2 to 3). The cut material is used and the final cut is done after 30-40 years, corresponding to about 500 to 600 trees/ha. The spontaneous vegetation along the growth process is controlled by harrowing or mechanical or manual trimming. When using natural regeneration approximately 25 large trees/ha are left as a seed source.

The techniques applied for Umbrella Pine (*Pinus pinea*) when planting depends on the final purpose of the forestation: production of wood or pine nuts.

When the forest production will be used for wood based products the natural pruning is tightened and encouraged (4 x 3). The distance between lines should allow the passage of agricultural machines for the cleaning of the forest. In stands for production of pine nuts (using or not grafting techniques), the trees must grow in good light and with good ventilation, in order to develop large crowns that promote the production of cones. The most widely used measure is (5 x 5), but (6 x 5), (6) and (8 x 6) are also used.

In sites well adapted to Umbrella Pine natural regeneration is reliable. The natural spread of this species presents a high quantity of plants per hectare. The selection of those plants in the beginning will guarantee that the selected ones will have the best conditions.

Stand tending is done through pruning and thinning which produces considerable amounts of woody material. The first pruning occurs 5/6 years after planting. The second pruning occurs after 10/12 years and taking into considering the development of the stand. This pruning often coincides with the first thinning. The third pruning will occur after 20/25 years coinciding with the second thinning. The final cutting is typically done from 40 years age.

Eucalyptus forestry (mainly *E. globulus*) is based on the clear-cutting of the forest, typically between 10 to 15 years of age. All wood is used, removed from the stand with or without bark (Simple Coppice). The plants are rotated and cut one, two or even three times. After every cut a selection of seedlings is left. After the last final cutting considered productive the area is reforested. In mixed populations with pine trees, the system is based on a thinning of the forest in order to leave a percentage of remaining trees for future utilization and rotating the seedlings from cut strains of eucalyptus trees (composed coppice).

An eucalyptus plantation starts with the preparation of land, which normally means the shredding of existing wood material which will be incorporated in the soil preparation. After this the normal procedure is tillage (harrowing, ripping and sub soiling).

Fertilization depends on the quality of the site and the landowner's conditions. The planting is done with a planting density from 1,100 to 1,300 plants per hectare. Between the second and the sixth year it is recommended to do a second fertilization and a control of competing vegetation.

The selection of seedlings is done every two or three years, maintaining the number of plants per hectare corresponding to the initial planting density.

In most cases, the cutting is done after 10 to 15 years. The system normally used for cutting is based on the combination of tractor processors and tractor loaders, usually with manual felling. .

The Poplar (*Populus* spp) is currently cultivated on a small scale. Depending on the nature of the soils (depth and moisture), the ground preparation is prepared late in summer or early fall. The model usually used is 4 x 4 meters. Plants from cuttings and one year old cuttings with buds are planted as deep as possible (0.5 meters) to develop a good root system.

Usually there is a strong competition from weeds which obliges hand weeding twice, complemented with surface harrowing during the first 4 years. The pruning during the first 3 to 4 years is very important to avoid forks and add value to the wood as normally the final destiny are production plants that process the round wood.

Poplar can be cultivated in coppice, with clear-cutting from 14 years of age, but often older depending the purpose and the opportunity of exploitation.

The Acacia (*Acacia* spp) is an invasive species in Portugal, appearing in pure or mixed stands. The plantation or cultivation of *Acacia* spp is not permitted but their exploitation is allowed.

ICNF – Instituto da Conservação da Natureza e das florestas (National Forest Authority)

Mission and ICNF assignments, I.P. – Extracts from Decree-Law N° 135/2012 of 29 June.

The conservation institute for Nature and Forestry, I.P. is a public institute an indirect state administration, endowed with administrative and financial autonomy and its own assets.

The ICNF, IP's mission is to propose, monitor and ensure the implementation of conservation policies of nature and forests, to promote the conservation, sustainable use, appreciation, enjoyment and public recognition of the natural heritage, promoting the sustainable development of forest areas and associated resources, increasing of competitiveness of the forestry sector, ensure the structural prevention in the framework of concerted planning and action in the field of forest protection and hunting resources and aquaculture in inland waters and other directly related to forest and forestry activities

The Portuguese Forest Management Plan (PGF) is a planning instrument provided for in the legal framework for forest policy law (Law No. 33/96 of 17 August) and, subsequently, in Decree-Law No. 16/2009 of January 14th which approves the legal framework of land use, management plans and general forest interventions, suspending Decree-Law No. 205/99 of June 9th, which regulates the process of preparation, approval, implementation and amendment of the PGF to be applied in forest areas.

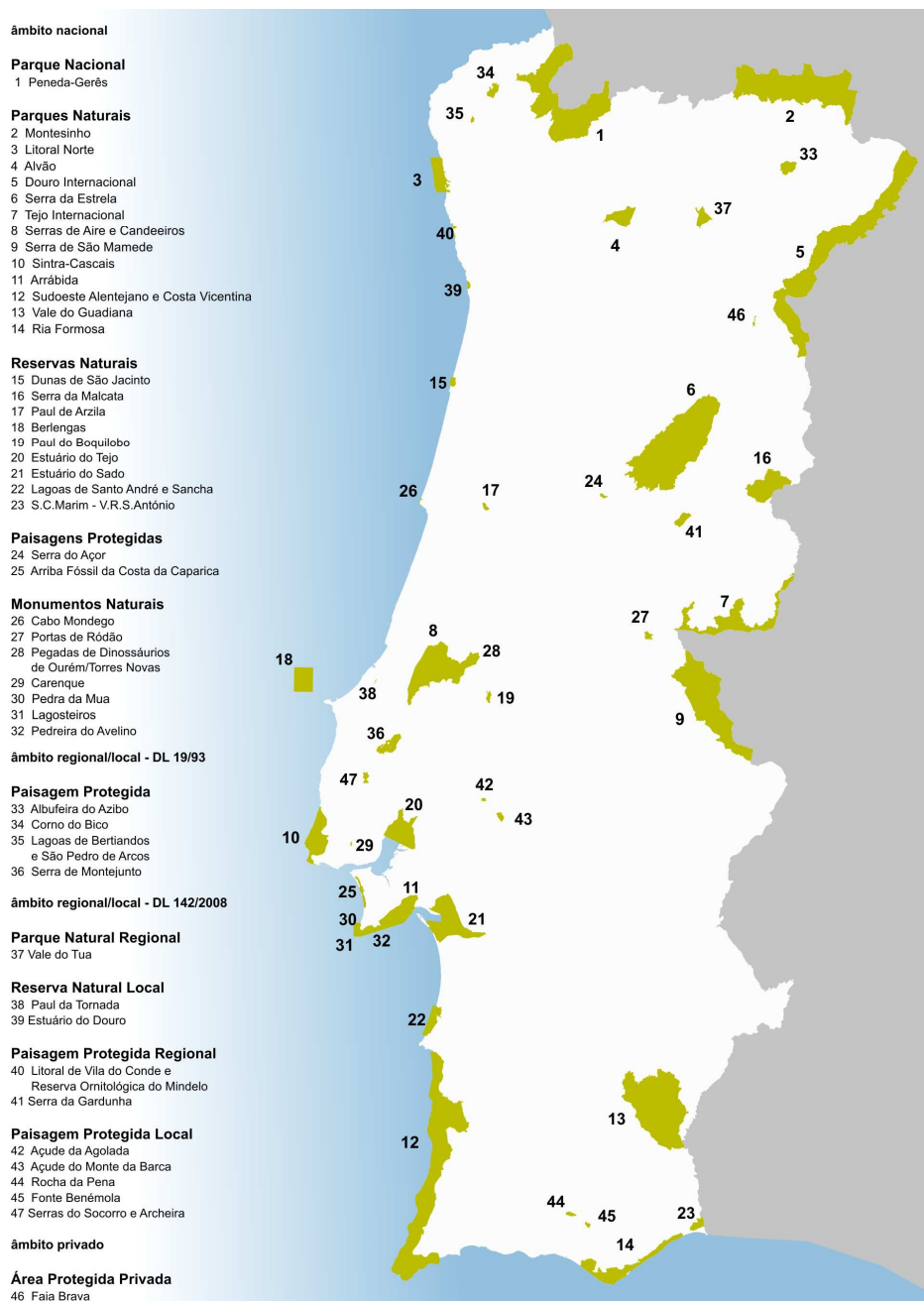
The dynamics of the processes for the elaboration of the PGF and the PEIF (Planos Específicos de Intervenção Florestal - Specific Plans for Forest Intervention) in a more general degree for the private and public forest areas are still recent, having started with the adoption of regional plans for the forest planning (PROF.), during the period 2006-2007. These plans were later reinforced with the condition of approved PGF as a criterion for the eligibility to access for forestry investment and supporting programmes under the PRODER program together with the development of forest certification processes.

In November 2018 (date of the last information available from ICNF), there were more than 3.000 PGF approved (1,72 million ha), representing 31% of the forest area of Continental Portugal.

It is not required a specific authorization for cutting in Portugal, except for ***Quercus suber*** and ***Quercus ilex*** and for logging in protected or classified areas. For coniferous species (pine and other) it's necessary to issue the "Manifesto de Abate "(Manifest for Cutting) for the cutting, pruning and transportation of wood from conifers (Decree-Law No. 123/2015, of 3 July). This concerns the implementation of extraordinary phytosanitary steps to protect the pine forest and control the pine wood nematode.

CITES – (Convention on International Trade in Endangered Species of Wild Fauna and Flora) not includes timber species on the lists for Portugal and Spain.

Map of National Protected Areas:



Product Group	Certification	Nº Suppliers	Input Group	Format	Species	Quantity (t)	%
Controlled Feedstock	FSC CW (*)	168	Primary Feedstock from forests (Products or residues)	Roundwood	Maritime Pine	146.136,56	78,79
			Primary Feedstock from forests (Products or residues)	Roundwood	Umbrella Pine	8.213,80	4,43
			Primary Feedstock from forests (Products or residues)	Roundwood	Others (Poplar, Acacia, etc.)	1.742,96	0,94
			Primary Feedstock from forests (Products or residues)	Roundwood	Eucalyptus	88,96	0,05
			Primary Feedstock from forests (Products or residues)	Chips	Maritime Pine; Umbrella Pine	538,44	0,29
			Secondary Feedstock Wood industry residues	Wood chips	Maritime Pine; Umbrella Pine	27.523,38	14,84
			Secondary Feedstock Wood industry residues	Slab - Wood	Maritime Pine; Umbrella Pine	465,76	0,25
			Secondary Feedstock Wood industry residues	Saw Dust	Maritime Pine; Umbrella Pine	760,58	0,41
SBP- Compliant Primary Feedstock	FSC	0	---	---	---	0.0	0.0
SBP- Compliant Secondary Feedstock	FSC	0	---	---	---	0.0	0.0

(*) Non-certified material controlled under the company's Chain of Custody Management System, which is certified according to the FSC-STD-40-005 Standard for Company Evaluation of FSC Controlled Wood.

2.2 Actions taken to promote certification amongst feedstock supplier

Pelletsfirst promotes sustainable forest management as part of its certification. The company is FSC certified (chain of custody), conducting an annual audit program for the company's' suppliers (verification of the wood supply chain).

The company has established a direct contact with every one of its suppliers making them to understand the importance of providing certified material (FSC) and drawing their attention to the markets and consumers increasing demands regarding the legal and sustainable sourcing of forest products, including biomass for energy production.

An important action to promote forest certification concerns the implementation of the Supply Control Program, requiring qualified suppliers to meet requirements applicable to forest certification.

Under this Program, good forest practices are also disclosed, applicable both to the suppliers harvest operations, and to forest installation and maintenance activities applicable to forest producers.

The company has also sensitized forest owners, warning of the added value of having the management of their certified areas, either individually or through group initiatives.

The company has also raised the awareness among forest owners about the added value of forest management certification, either individually or in group.

Furthermore, the company personal has participated in events related to the management and forest certification, collecting information and giving contribution to the development of taken actions in Portugal.

2.3 Final harvest sampling programme

It is estimated that in 2018, 0,58% of forest material supplied may have originated from final cuts from forest areas with a higher turnover period then 40 years as a result of the separation of dimensions larger than 40 cm at when receiving the material at the plant. This refers essentially to Maritime Pine and Umbrella Pine (*P. pinaster* e *P. pinea*) roundwood. It is also estimated that 49,25% of primary feedstock may have originated from final cuts from forest areas with a higher turnover period then 40 years, also of Maritime and Umbrella Pine supplied from burned areas (forest fires).

Given the survey of major suppliers that have provided final cuts forest areas, it is estimated that 80% of this type of material marketed by them has been intended for other uses, specifically for sawmill.

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

n.a.

2.5 Quantification of the Supply Base

Supply Base

- | | | |
|-------------------------------------|--|--------------------|
| a. Total Supply Base area: | 3,27 million ha | |
| b. Tenure by type: | Private: 2,84 million ha | Public: 472.200 ha |
| c. Forest by type: | Temperate: 3,27 million ha | |
| d. Forest by management type: | Plantations: 1.85 million ha; Natural/ Semi natural: 1.42 million ha | |
| e. Certified forest by scheme (ha): | FSC: 472.983 ha | PEFC: 277.679 ha |

Feedstock

- f. Total volume of feedstock: 0 – 200.000 t (184.932,004 t)
- g. Volume of primary feedstock: 0 – 200.000 t (185.470,44 t)
- h. Percentage of primary feedstock:
 - Certified to an SBP-approved Forest Management Scheme: 1. 0%-19% (0,00%)
 - Not certified to an SBP-approved Forest Management Scheme: 5. 80%-100% (100%)
- i. List all species in primary feedstock, including scientific name
 - Maritime Pine (*Pinus pinaster*)
 - Umbrella Pine (*Pinus pinea*)
 - Eucalyptus (*Eucalyptus* spp)
 - Poplar (*Populus* spp)
 - Acacia (*Acacia* spp)
- j. No primary feedstock from primary forest
- k. n.a.
- l. Volume of secondary feedstock: 28.749,72 t - 1. 0% - 19% (15,50%)
- m. Volume of tertiary feedstock: 0 t - 1. 0%-19% (0 %).

Forecasts for 2020

For the following year, the maintenance of the supply profile is expected, with the same capacity for pellet production. It is expected to maintain the same level of supply of secondary feedstock (wood chips, slabs and sawdust).

With the company's efforts to encourage the supply of certified source material (FSC/PEFC), it is expected that the volumes registered for these material categories will increase.

With the certification according to the Standard 1: Feedstock SBP Compliance Standard, the company intend to initiate and progressively increase the supply of "SBP compliant" feedstock.

3 Requirement for a Supply Base Evaluation

SBE completed	SBE not completed
<input checked="" type="checkbox"/>	<input type="checkbox"/>

Most of feedstock is not FSC nor PEFC certified, which results in a need for a Supply Base Evaluation to enable the supply of “SBP Compliant Biomass” pellets.

4 Supply Base Evaluation

4.1 Scope

Primary feedstock originating from forests located in Portugal, mainly the districts of Aveiro, Beja; Braga, Castelo Branco, Coimbra; Évora, Leiria; Lisboa; Portalegre, Santarém e Setúbal, provided by qualified suppliers under company Supply Control Program.

4.2 Justification

The Supply Base Evaluation is justified by the company's intention to increase pellet production with the “SBP Compliant Biomass” claim, considering the insufficient supply of FSC and PEFC certified primary feedstock in national market.

4.3 Results of Risk Assessment

While the Regional Risk Assessment (RRA), which is being carried out by the Working Group created under Technical Committee 145 of the Portuguese Quality Institute (IPQ), and coordinated by AIMMP (Associação das Indústrias de Madeira e Mobiliário de Portugal), is not yet completed and endorsed by SBP, the first Regional Risk Assessment made in 2016 on request by ANPEB (Associação Nacional de Pellets Energéticos de Biomassa – Actually integrated on AIMMP) was considered for this SBE, which was made in accordance with the requirements of the SBP, for primary feedstock originating from Portugal mainland, presenting 13 indicators with specified risk:

- 2.1.1 - Forests and other areas with high conservation value in the Supply Base are identified and mapped;
- 2.1.2 - Potential threats to forests and other areas with high conservation values (HCV) from forest management activities are identified and managed. (HCV 1, HVC 3, HCV4 e HCV5);
- 2.1.3 - Feedstock is not sourced from forests converted to production plantation forest or non-forest lands after January 2008;
- 2.2.1 - Feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them;
- 2.2.2 - Feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b);

- 2.2.3 - Key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b);
- 2.2.4 - Biodiversity is protected (CPET S5b);
- 2.2.6 - Negative impacts on ground water, surface water and water downstream from forest management are minimized. (CPET S5b);
- 2.4.1 - The health, vitality and other services provided by forest ecosystems are maintained or improved (CPET S7a);
- 2.4.2 - Natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b)
- 2.5.1 - 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);
- 2.8.1 - Appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12) ;
- 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.

4.4 Results of Supplier Verification Programme

n.a.

4.5 Conclusion

The main conclusion of the company Supply Based Evaluation indicates that the company, through its Supplies Control Program, is able to ensure the supply of primary feedstock with indicators as low risk, thus suitable for production of pellets with “SBP Compliant Biomass” claim.

To date, the Program has produced the following results:

- Training and qualification of 3 suppliers;
- 4 Monitoring Inspections (Primary Feedstock);
- 3 supplies with Information of Origin of the Forest Material, totalling 4.933,06 tons of primary feedstock;
- Low risk evaluation for these supplies.

5 Supply Base Evaluation Process

The company Supply Base Evaluation was carried out by a team defined and coordinated by the Quality and Sustainability Manager, with expertise and experience in topics related to the specified risks and the defined mitigation measures, including ENplus, FSC and SBP certifications.

As mentioned above, was considered the first National Risk Assessment made upon request of AIMMP, in accordance with the requirements of the SBP.

For the 13 indicators with specified risk, mitigating measures and respective means of verification were defined under Supplies Control Program.

Suppliers of primary feedstock were evaluated regarding their capacity and regularity of supply, identifying some as potential for the implementation of the Supplies Control Program.

Two suppliers were selected and invited to participate in the Program, having been trained and qualified.

As a support, a guide for Good Forest Practices was prepared and distributed, applicable to suppliers and forestry producers and managers, as well as forms for the collection and sending of information.

Qualified suppliers have their legal status proven, practice and promote Good Forest Practices, collect and send prior information about the area of origin of the material to be supplied, and are subject to company control and monitoring actions.

For each supply area, the qualified supplier must collect the necessary information, in conjunction with the forest owner and/or responsible for the area, by filling in a form designed for this purpose, which is sent to company.

Based on the information received, the company personal evaluate the context and identify any aspects to be verified and confirmed to ensure compliance with mitigating measures and the respective risk assessment.

Company personal should ensure that the area is right identified and, depending on the situation, to be consulted the sources that are referenced in the risk assessment, which have information to conclude about risk indicators and to establish possible mitigating measures.

The analysis of information and consultations can lead to the following situations:

- **Disqualification of material:** in the case of confirmed specific risk for at least 1 indicator. (Example: indication that the area is not replanted after harvest – Indicator 2.1.3);
- **Need for conduct specific field inspection:** in the case of doubtful situations or requesting more information or confirmation. (Example: difficult to accurately locate the area; Indication of the presence of important natural areas, pests or diseases, signs of erosion, information from stakeholders, etc.);

- **Low risk classification:** in the case of no indication that raises questions, including the consultation sources.

The verification to confirm the origin of forest material, the effectiveness of mitigating measures and, in the end, the framework of the specified risks, is based on control inspections, made to a sample of suppliers, based on the number of suppliers that were active in the previous year.

Once chosen the suppliers to monitor, origin areas of the material provided as "SBP-compliant" are identified, taking into account the supply frequency, quantity, characteristics of the sites and the type of material provided.

Monitoring inspections are made by expertise personal with experience in the issues related to specified risks and mitigating measures defined, registering the details and evidences, the conclusion about the risk and possible corrective actions, taking account of the criteria and guidelines established on SBP standards and other applicable requirements.

6 Stakeholder Consultation

The Supply Base Evaluation, including the Risk Assessment and the Supplies Control Program, was subject to a public consultation, launched on September 13, 2019, in order to gather contributions to consolidate or improve the SBE.

The consultation was done by e-mail, and about 90 interested parties were contacted, including Authorities, Municipalities, Town Councils, Representative Entities, Forest Associations, Suppliers, Expertises, Fire Corporations, etc..

6.1 Response to stakeholder comments

So far no responses have been received.

7 Overview of Initial Assessment of Risk

The National Risk Assessment made upon request of ANPEB (AIMMP), in accordance with the requirements of the SBP, for primary feedstock originating in the mainland of Portugal, identified 13 indicators with specified risk:

Table 1. Overview of results from the risk assessment of all Indicators

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	

Indicator	Initial Risk Rating		
	Specified	Low	Unspecified
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

n.a.

8.2 Site visits

n.a.

8.3 Conclusions from the Supplier Verification Programme

n.a.

9 Mitigation Measures

9.1 Mitigation measures

Supplies Control Program includes the following mitigation measures and respective means of verification, for each of the indicators considered with specified risk.

2.1.1 - Forests and other areas with high conservation value in the Supply Base are identified and mapped

- Consultation of cartography and others information sources, and verification that forests and other areas with high conservation values (HCV), specifically HCV 1.2, HCV 1.3, HCV 1.4 and HCV 3, are identified and mapped;
- Disqualify material coming from areas where high conservation values are not identified and mapped.

Means of Verification:

- Checklist completed by the supplier/forest owner;
- Location and consultation of information and cartography.

2.1.2 - Potential threats to forests and other areas with high conservation values (HCV) from forest management activities are identified and managed. (HCV 1, HVC 3, HCV4 e HCV5)

- Consultation of information sources regarding HCVs;
- Procedures for conduct specific field Inspections to identify and address real and potential threats to forests and other areas with high conservation values, specifically HCV 1, HCV 2, HCV 3 and HCV 4, which were previously identified and mapped;
- Disqualify material coming from areas where forest management and operations represent evident threats to HCV 1, HCV 2, HCV 3 and HCV 4;
- Promotion of Good Forest Practices;
- Monitoring plan.

Means of Verification:

- Checklist completed by the supplier/forest owner;
- Location, consultation of information sources and identification of constraints established for areas;
- PGF (Forest Management Plan) or project approved, when applicable;
- Forest authority (ICNF) document, when applicable;
- Field Inspection.

2.1.3 - Feedstock is not sourced from forests converted to production plantation forest or non-forest lands after January 2008

- Consultation of historical information sources and information from stakeholders;
- Analysis of owner's information regarding the past and future area's covering and use;
- Procedures to conduct monitoring field Inspections to verify if feedstock is or is not sourced from forests converted to production plantation forest or non-forest lands after January 2008;
- Disqualify material coming from areas where natural forest were converted into Eucalyptus or other plantation from 2008, or to be converted with Eucalyptus or other plantation, or transformed into pasture, agriculture or other non-forest use;
- Promotion of Good Forest Practices;
- Monitoring plan.

Means of Verification:

- Checklist completed by the supplier/forest owner;
- Location and consultation of the owner and stakeholders;
- Field Inspection.

2.2.1 - Feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them

- Consultation of information sources and legislation regarding impact assessment;
- Analysis of information from the area regarding social and environmental aspects;
- Procedures for conduct field Inspections to verify social and environmental aspects and the appropriate assessment, planning and implementation of measures for minimise real or potential impacts, especially in case of clear cuttings made over a specific size area, defined regionally by each Regional Forest Plan (PROF), as the maximum clearcutting area or the size of even aged monoespecific forest stand;
- Disqualify material coming from areas where no appropriate assessment of impacts, and planning, implementation and monitoring to minimise them, is confirmed;
- Promotion of Good Forest Practices;
- Monitoring plan.

Means of Verification:

- Checklist completed by the supplier/forest owner;
- Consultation of Regional Forest Plans (PROF);
- Field Inspection.

2.2.2 - Feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b)

- Consultation of information sources and legislation related with soil aspects;
- Analysis of information from the area regarding soil erosion;
- Procedures for conduct field Inspections to verify if forest management maintains or improves soil quality, especially in forest lands located on desertification susceptible area according to Forest Services (ICNF) cartography and with size above minimum size required for Forest Management Plan in respective PROF;
- Disqualify material coming from areas where is confirmed that forest management do not maintains or improves soil quality;
- Promotion of Good Forest Practices;
- Monitoring plan.

Means of Verification:

- Checklist completed by the supplier/forest owner;
- Consultation of Forest authority (ICNF) cartography and Regional Forest Plans (PROF);
- Field Inspection.

2.2.3 - Key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b)

- Consultation of information sources regarding biodiversity;
- Analysis of information from the area regarding biodiversity;
- Procedures for conduct specific field Inspections to identify and address real and potential threats to conservation of key ecosystems and habitats;
- Disqualify material coming from areas where forest management and operations represent evident threats to conservation of key ecosystems and habitats;
- Promotion of Good Forest Practices;
- Monitoring plan.

Means of Verification:

- Checklist completed by the supplier/forest owner;
- Location, consultation of information sources and identification of conditions established for concerned areas, ecosystems and habitats;
- PGF (Forest Management Plan) or project approved, when applicable;
- Forest authority (ICNF) document, when applicable;
- Field Inspection.

2.2.4 - Biodiversity is protected (CPET S5b)

- Consultation of information sources regarding biodiversity;
- Analysis of information from the area regarding biodiversity;
- Procedures for conduct specific field Inspections to identify and address real and potential threats to protection of biodiversity;
- Disqualify material coming from areas where is confirmed that forest management and operations do not ensure that biodiversity is protected;
- Promotion of Good Forest Practices;
- Monitoring plan.

Means of Verification:

- Checklist completed by the supplier/forest owner;
- Location and consultation of information sources;
- PGF (Forest Management Plan) or project approved, when applicable;
- Forest authority (ICNF) document, when applicable;
- Field Inspection.

2.2.6 - Negative impacts on ground water, surface water and water downstream from forest management are minimized. (CPET S5b)

- Consultation of information sources and legislation related with water;
- Analysis of information from the area regarding soil erosion;
- Procedures for conduct field Inspections to verify if forest management maintains or improves soil quality, especially in case of clear cuttings at dimensions above to the maximum area indicated for each region by PROF (Regional Forestry Management Plan), in areas which are not managed by ICNF;
- Disqualify material coming from areas where is confirmed that forest management do not minimise negative impacts on ground water, surface water and water downstream;
- Promotion of Good Forest Practices;
- Monitoring plan.

Means of Verification:

- Checklist completed by the supplier/forest owner;
- Location and consultation of information sources and Regional Forest Plans (PROF);
- PGF (Forest Management Plan) or project approved, when applicable;
- Field Inspection.

2.4.1 - The health, vitality and other services provided by forest ecosystems are maintained or improved (CPET S7a)

- Consultation of information sources regarding biotic and abiotic risks for the ecosystems services;
- Analysis of information from the area regarding biotic and abiotic risks;
- Procedures to access information from the area regarding biotic and abiotic risks, and procedures for conduct monitoring field Inspections to verify ecosystems services, social and environmental aspects and the appropriate assessment, planning and implementation of measures for minimise real or potential risks and impacts;
- Disqualify material coming from areas where health, vitality and other services provided by forest ecosystems are not maintained or improved;
- Promotion of Good Forest Practices;
- Monitoring plan.

Means of Verification:

- Checklist completed by the supplier/forest owner;
- Location and consultation of information sources;
- PGF (Forest Management Plan) or project approved, when applicable;
- Field Inspection.

2.4.2 - Natural processes, such as fires, pests and diseases are managed appropriately(CPET S7b)

- Consultation of information sources and legislation regarding natural processes (fires, pests, invasive species, and diseases);
- Analysis of information from the area regarding invasive species, diseases, resources for fire prevention and protection;
- Procedures for conduct field Inspections to verify these aspects if necessary;
- Disqualify material coming from areas where natural processes, such as fires, pests and diseases, are not managed appropriately;
- Promotion of Good Forest Practices;
- Monitoring plan.

Means of Verification:

- Checklist completed by the supplier/forest owner;
- Location and consultation of information sources;
- PGF (Forest Management Plan) or project approved, when applicable;
- Field Inspectio.

2.5.1 - 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)

- Analysis of information from the area regarding use and abuse of fences and inadequate signs and closed gates;
- Procedures for conduct field Inspections to verify these aspects if necessary;
- Disqualify material coming from areas where is confirmed the use and abuse of fences and inadequate signs and closed gates in a way that customary rights are not respected (except in case of licensed cattle parks or big game hunting areas);
- Promotion of Good Forest Practices;
- Monitoring plan.

Means of Verification:

- Checklist completed by the supplier/forest owner;
- Legal license, when applicable;
- Field Inspection.

2.8.1 - Appropriate safeguards are put in place to protect the health and safety of forest workers(CPET S12)

- Suppliers training and qualification;
- Confirmation of legal status of qualified suppliers in relation with health and safety requirements.
- Procedures for conduct monitoring field Inspections to verify all the aspects related with health and safety of forest workers;
- Disqualify material coming from areas where there are insufficient or inappropriate safeguards to protect the health and safety of forest workers;
- Promotion of Good Forest Practices;
- Monitoring plan.

Means of Verification:

- Documentation of the operator (supplier, owner or other): health insurance, medical certificates, Social security non-debt statement, training records, records of Personal Protection Equipment distribution, etc;
- Field Inspection.

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

- Consultation of information sources regarding high carbon stocks areas (wetlands, peatlands and old mature forests stands);
- Analysis of information from the area regarding the riparian vegetation and old mature forests stands;
- Procedures for conduct monitoring field Inspections to verify if biomass is sourced from areas that had high carbon stocks in January 2008 and no longer have those high carbon stocks;
- Disqualify material coming from areas that had high carbon stocks in January 2008 and no longer have those high carbon stocks;
- Promotion of Good Forest Practices;
- Monitoring plan.

Means of Verification:

- Checklist completed by the supplier/forest owner;
- Legal harvest license, when applicable;
- Field Inspection.

9.2 Monitoring and outcomes

The results obtained so far:

- 03 supplies with Information of Origin of Forest Material,
- 02 Control Inspections;
- 4.933,06 tons of primary feedstock supplied with origin information from qualified suppliers;
- 4.933,06 tons of primary feedstock with all indicators with low risk;
- 0 tons of primary feedstock with at least one indicator with specific risk.

It was possible to assess the risk as low for all indicators in all supplies, and it was decisive:

- The information collected in advance from the areas;
- The consultation of the various sources of information indicated in the Risk Assessment;
- The verification of areas and operations;
- The organizational level of suppliers;
- The good conditions of machinery and equipment;
- The training and experience of workers, and;
- The observation of good forest practices during the execution of operations.

10 Detailed Findings for Indicators

Detailed findings for each Indicator are presented in the document “SBP National Risk Assessment for Portugal” Assessment made upon request by ANPEB (Associação Nacional de Pellets Energéticos de Biomassa – Actually integrated on AIMMP- Associação das Indústrias de Madeira e Mobiliário de Portugal) in compliance with SBP framework.

11 Review of Report

11.1 Peer review

This report was originally sent to an independent reviewer. The review period was 10 days. The comments received were duly considered in the final edition of the report, and this version was only updated with the most recent data from the National Forest Inventory (IFN6).

The reviewer is a Registered Professional Forester with university degrees in forestry from both Sweden and Canada. Since 1982, he has worked for various forest based companies and organisations in Sweden, Canada, Switzerland and Portugal where he currently resides.

At this time, he works in Portugal, Sweden, Norway, Denmark, USA and Canada as a natural resource consultant in management, representation and certification as well as an auditor for SBP, FSC, PEFC, ISO 9001, ISO 14001, ISO 19011, OHSAS 18001 and GAP analyses.

11.2 Public or additional reviews

The Supply Base Evaluation, including the Risk Assessment and the Supplies Control Program, was subject to a public consultation, launched on September 13, 2019, in order to gather contributions to consolidate or improve the SBE.

The consultation was done by e-mail, and about 90 interested parties were contacted, including Authorities, Municipalities, Town Councils, Representative Entities, Forest Associations, Suppliers, Expertises, Fire Corporations, etc.

12 Approval of Report

Approval of Supply Base Report by senior management			
Report Prepared by:	Sílvia Jorge	Quality and Sustainability Manager	18/10/2019
	Giovanni de Alencastro	Consultant	
		Name	Title
<p>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.</p>			
Report approved by:	João Magalhães	Administrador	18/10/2019
	Name	Title	Date

13 Updates

13.1 Significant changes in the Supply Base

A direct consequence of the wildfires in the summer/autumn of 2017 and Storm Leslie is still felt, with an increase in the supply and storage of feedstock from the burned and/or devastated areas.

Preparation of the Supply Base Evaluation, expecting to begin the consumption of "SBP Compliant" feedstock.

13.2 Effectiveness of previous mitigation measures

n.a.

13.3 New risk ratings and mitigation measures

n.a.

13.4 Actual figures for feedstock over the previous 12 months

Material	Species	Quantity (t)
Primary Feedstock from forests (Roundwood and forest residues from the logging process)	Maritime Pine	146.136,564
	Umbrella Pine	8.213,800
	Eucalyptus	88,96
	Others (Poplar, Acacia, etc.)	1.742,960
Primary Feedstock from forests (Peel, bark and branches)	Maritime and Umbrella Pine	538,440
Wood industry residues (Woodchips, Slabwood and sawdust)	Maritime and Umbrella Pine	28.749,720
Total		185.470,444

13.5 Projected figures for feedstock over the next 12 months

Material	Species	Quantity (t)
Primary Feedstock from forests (roundwood and forest residues from the logging process)	Maritime Pine	162.000
	Umbrella Pine	10.000
	Others (Poplar, Acacia, etc.)	2.500
Primary Feedstock from forests (peel, bark and branches)	Maritime and Umbrella Pine	500
Wood industry residues (Woodchips, Slabwood and sawdust)	Maritime and Umbrella Pine	35.000
Total		185.470,444

Supply Base Report

Annex 1

www.sbp-cert.org



Version 1.1 January 2019

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

Document history

Version 1.0: published 26 March 2015

Version 1.1: published 14 January 2019

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Annex 1: Detailed Findings for Supply Base Evaluation Indicators

	Indicator
1.1.1	The Biomass Producer's Supply Base is defined and mapped.
Finding	<p>This SBP Regional Risk Assessment covers feedstock coming from material with origin in Mainland Portugal.</p> <p>In Mainland Portugal, private property from private owners (89%) and communitarian (Baldios, 8%) correspond to 3,060 million hectares of forests (97% of total forest land), including 5.7% property of industry enterprises. Public areas are up to 3% (around 94,000 has).</p> <p>Also average size of forests lands is 5.9 has with significant differences among regions. In the North and Central Mainland Portugal prevails lands with surface bellow 1 ha. In the South (with the exception of Algarve) prevails lands bigger than 10 has. 61% of forest owners has properties under 5 has representing 26% of total forest surface.</p> <p>Regarding species, most relevant in terms of pellets production are Pinus pinaster (Maritime pine/Pinheiro bravo) 23% of forest surface 714,000 has, Pinus pinea (Stone pine/Pinheiro manso) 6% of forest surface 175,000 has, and Eucalyptus spp. (Eucalyptus/Eucalipto) 26% of forest surface 812,000 has. These 3 species are distributed all around country, especially Pinus pinaster and Eucalyptus spp. Pinus pinea is clearly more abundant in the South. All other species present in Mainland Portugal: Quercus suber (Cork oak/Sobreiro), Quercus ilex (Holm oak/Azinheira), Quercus spp. (Oaks/Carvalhos), Castanea sativa (Chestnut/Castanheiro), Fraxinus spp. (Ash/Freixo), Alnus glutinosa (Alder/Amieiro),... are also used on drying process.</p> <p>So primary wood based input material comes mainly from private properties from several species.</p> <p>In regards to mapping on the forest level, the main planning document, which serves as a description of the supply base is the Forest management plan. Instructions on forest management planning define the requirements for data and map description to be included into the management plan. In 2013 over 44% of forest surface was covered by management plan, but the obligation is only for properties above a specified size defined regionally.</p> <p>However, since there have been several rounds of subsidies, many estates that would not otherwise have forest maps, now have them. Data about the proportion of forest without any cartography was not found available.</p>

Finding	<p>For areas where forest maps are not available, it will be the obligation of the BP to ensure that maps of sufficient scale and quality are available.</p> <p>On the above background and limitations in scope, it is concluded that there is low risk in relation to the definition and mapping of the supply base.</p>
Means of Verification	<ul style="list-style-type: none"> • The Scope is defined and justified; • Maps to the appropriate scale are available; • Key personnel demonstrate an understanding of the supply base.
Evidence Reviewed	<p>Estrategia Nacional das Florestas (RCM n.º 6-B/2015 - Diário da República n.º 24/2015, 1º Suplemento, Série I de 2015-02-04); ICNF portal (http://www.icnf.pt/portal/icnf/docref/enf)</p> <p>Inventario Florestal Nacional IFN5 (FloreStat_IFN5); ICNF portal (http://www.icnf.pt/portal/florestas/ifn/ifn5/rel-fin)</p> <p>Inventario Florestal Nacional IFN6, preliminary results (IFN6 - Resultados preliminares.pdf); ICNF portal (http://www.icnf.pt/portal/florestas/ifn/ifn6)</p> <p>Estatísticas Agrícolas 2015.xls, Instituto Nacional Estatística (https://www.ine.pt/xportal/xmain?xpid=INE&xpgid=ine_publicacoes&PUBLICACOESpub_bo ui=271434407&PUBLICACOESmodo=2)</p> <p>Decreto lei 16-2009 planos gestão florestal (https://dre.pt/application/dir/pdf1sdip/2009/01/00900/0026800273.pdf); ICNF portal (http://www.icnf.pt/portal/icnf/legisl/legislacao/2009/decreto-lei-n.o-16-2009-de-14-de-janeiro.-d.r.-n.o-9-serie-i)</p> <p>Normas Tecnicas Planos Gestão Florestal (http://www.icnf.pt/portal/florestas/gf/pgf/resource/doc/manual/normas-tecn-PGF-AFN.pdf)</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
1.1.2	Feedstock can be traced back to the defined Supply Base.
Finding	<p>Information obtained from Centro Pinus (non-profit association for key players of Pine Row), INE and others shows that pine wood consumption of timber industry in 2014 was 4,360,000 m³ (1,300,000 m³ sawn mill industry, 30%; 300,000 m³ biomass, 7% and 1,400,000 m³ pellets, 32% and 1.360.000 other uses not relevant for pellets industry). However, in 2014 there was available only 2,247,000 m³ of pine wood from Mainland Portugal (<i>Pinus pinaster</i>). As an obvious conclusion, a lot of imported pine comes into Portuguese timber industry in 2014, mostly from Spain.</p> <p>Similar situation is in Eucalyptus for pulp and paper industry, where low quality parts may be also used in biomass industry. Information from Annual Bulletin of CELPA (Paper Industry Association) states that in 2014, there was imported 45% of total eucalyptus wood procured by paper industry (2,415,000 m³ imported), in its vast majority round wood from Spain and minority chips from South America or Africa (usually FSC/PEFC certified or controlled).</p> <p>Based on the fact that relevant volumes of imported material come into Portugal annually, it is noted that imported material it is not covered by this RRA.</p> <p>Regarding Mainland Portugal, no permit is required for normal silvicultural harvesting, including the final cut. In fact, a legal demanding is designed for cuttings for properties with areas below the size of obligatory Forest Management Plan, but it was not defined the details and so it is not in place (article 7th of Law n.º 33/96, at 17/08).</p> <p>A felling manifest is obligatory for all normal commercial harvesting activities, and may be submitted to forest authorities (ICNF) up to 30 days after the felling operation. However, this manifest is used only for national statistical purposes, and not for trading or transporting forest products.</p> <p>A National Action Plan for Control of Pinus Wilt Disease/Nemátodo-da-madeira-do-pinheiro (NMP) (<i>Bursaphelenchus xylophilus</i>) and its vector insect <i>Monochamus galloprovincialis</i> is in place and there is obligation of previous communication of any felling and/or transportation of wood affected by pest. This documentation (phytosanitary manifest) also must accompany material until the arrival to industrial processing facilities. This mostly focuses on <i>Pinus pinaster</i> (23% of all forest areas) main source for BP.</p>

Finding	<p>On the other hand, approval documentation is required relating to specific operations on cork and holm Oak including cuttings and prunings, Holly cuttings, and also premature cuttings of Eucalyptus, <i>Pinus pinaster</i> or riparian cuttings.</p> <p>Since 2013 and the introduction of the EUTR laws, operators are required to register their activities on a Digital Platform managed by forest authorities (ICNF). Inspections from government are in place and operators must apply DDS to justify legality of timber.</p> <p>Regarding transportation, legal requirements including having the correct and valid invoice or transport documentation are in place:</p> <ul style="list-style-type: none"> • Regular invoice for trading operation or transport documentation or waybill, or devolution note • CRM on international transportation • In case of pine or conifers timber the transporter must have an Economic Operator Registry and a phytosanitary Manifest for each felling (if one felling is transported several times it is mandatory to copy the manifest for all the transportations) <p>The issuance of required transport and sales documents is well understood and regulations are largely adhered to. Inspections are common at Portuguese roads and enforcement of regulations is seen to be good.</p> <p>Felling phytosanitary manifest includes identification of the origin of the felling. Also documentation for transportation identifies the origin of the transport which could be useful in case of direct transport to BP facilities and, in any case, is useful in the traceability of material. Both ways are the most common to trace back to origin even if the origin area is not the forest land itself but the <i>freguesia</i> (minimum administrative division) where forest land is included.</p> <p>There system in place to trace the feedstock primary origin back to the forest stand, but it is possible to do so if there are elements in the manifests or transportation documents, which could be used in the cadastral system (as the article number and section) or geographic coordinates in areas without cadastral system.</p> <p>As evidenced by the low Corruption Perception Index of Portugal (63) and the high level of law enforcement documents such as invoices and transport documents can be seen as reliable sources of information.</p> <p>On the above background, the risk related to the traceability of feedstock back to the supply base is evaluated to be Low as there are enough tools available to know if a Feedstock comes from Mainland Portugal.</p>
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Means of Verification	<ul style="list-style-type: none"> • Copy of phytosanitary manifests (felling and/or transportation) for all conifers with geographic elements (cadastral and/or coordinates); • Copy of delivered felling manifest to Forest Authorities (ICNF) for all commercial harvestings with geographic elements (cadastral and/or coordinates). • Invoices, waybills, transport/shipping documents • The existence of a strong legal framework in the region • Feedstock inputs, including species and volumes, are consistent with the defined Supply Base; • Transport documentation and goods-in records are consistent with the defined scope of the SBE.
Evidence Reviewed	<p>Estrategia Nacional das Florestas (RCM n.º 6-B/2015 - Diário da República n.º 24/2015, 1º Suplemento, Série I de 2015-02-04); ICNF portal (http://www.icnf.pt/portal/icnf/docref/enf)</p> <p>Estatísticas Agrícolas 2015.xls, Instituto Nacional Estatística (https://www.ine.pt/xportal/xmain?xpid=INE&xpgid=ine_publicacoes&PUBLICACOESpub_bo ui=271434407&PUBLICACOESmodo=2)</p> <p>Boletim-Estatístico-da-Celpe-de-2014 (http://www.celpe.pt/wp-content/uploads/2016/09/Boletim_WEB_2015.pdf)</p> <p>Relatório-de-Characterização-da-Fileira-Florestal-2014 (http://www.aiff.org.pt/assets/Relatorio-de-Characterizacao-da-Fileira-Florestal-2014-160p-CAPA-3-spread....pdf)</p> <p>Cutting Permission in Law n.º 33/96, at 17/08 (article 7th) https://dre.pt/application/dir/pdf1sdip/1996/08/190A00/25682573.pdf</p> <p>Fileira do Pinho: desafios e oportunidades (centroPINUS_JoaoGonçalves dados fileira pinho 2014.pdf); Centro Pinus (http://www.centropinus.org/index.php?lingua=1)</p> <p>Decreto lei 123-2015 nematodo do Pinheiro (https://dre.pt/application/file/67649256); ICNF portal (http://www.icnf.pt/portal/florestas/prag-doe/ag-bn/nmp)</p> <p>Declaração Retificação n.º 38/2015 de 01/09 do Decreto lei 123-2015 nematodo do Pinheiro (https://dre.pt/application/file/70144398)</p> <p>Decreto lei 174-1988 manifesto corte (https://dre.pt/application/file/374768); ICNF portal(http://www.icnf.pt/portal/icnf/serv/formularios/manif/man-cort-arr-arvor)</p> <p>Decreto lei 169-2001 Sobreiras e azinheiras (Decreto lei 169-2001 Sobreiras e azinheiras.pdf); ICNF portal (http://www.icnf.pt/portal/icnf/serv/formularios/sobr-azinh)</p> <p>Registo de Operador de Madeira e Derivados ICNF portal (http://www.icnf.pt/portal/florestas/fileiras/reg-op)</p> <p>Decreto Lei 198/2012 de 24/08 FATURAS E OUTROS DOCUMENTOS COM RELEVÂNCIA FISCAL</p>

Evidence Reviewed	<p>(http://info.portaldasfinancas.gov.pt/NR/rdonlyres/907FD2F4-9A9C-485D-8A99-FD164BF9FCEC/0/Decreto-Lei%20n%20 198 2012 24 08.pdf)</p> <p>Transparency international, corruption perception index Portugal</p> <p>(https://www.transparency.org/country/#PRT)</p>
Risk Rating	<p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>
Comment or Mitigation Measure	

	Indicator
1.1.3	The feedstock input profile is described and categorised by the mix of inputs.
Finding	<p>As described in previous indicators Primary Feedstock comes mainly from private properties and several species: mainly Pines and Eucalyptus for pellets production and other species for drying. Sawmills and other timber industry entities producing feedstock during timber processing, are sources of Secondary Feedstock. The main products provided from sawmill and other timber industry entities are shavings, sawdust and chips.</p> <p>There is no specific legislation regulating classification of wood/timber harvested in Portugal in terms of species, quantities or qualities. The fact is that most of forests are productive and Eucalyptus, Pines and Cork Oak covers 78% of forest land and this causes not perceiving this issue as a problem with national wood/timber.</p> <p>Industrial use of Eucalyptus and Pines ensures that they are adequately classified and measured. Felling manifests require identification of species and volumes and are obligatory for every forest species for industrial use.</p> <p>Since the supply chains are usually not reliable enough, information regarding the feedstock can be gathered in collaboration with the forest owners when necessary. Thus accurate classification and description of type, species, and categorization into roundwood and residual wood material, and when required, the approximate proportion of roundwood from final felling, in accordance with SBP requirements is possible for Biomass Producers.</p> <p>Based on the available information, the risk for this indicator has been assessed as Low.</p>
Means of Verification	<ul style="list-style-type: none"> • Copy of delivered felling manifest to Forest Authorities (ICNF) for all species used in industrial purposes • Invoices • Transport/shipping documents • Waybills • Feedstock input records
Evidence Reviewed	<p>Estratégia Nacional das Florestas (https://dre.pt/application/file/66432612); ICNF portal (http://www.icnf.pt/portal/icnf/docref/enf)</p> <p>Inventario Florestal Nacional IFN6, preliminary results (IFN6 - Resultados preliminares.pdf); ICNF portal Decreto lei 174-1988 manifesto corte (https://dre.pt/application/file/374768); ICNF portal(http://www.icnf.pt/portal/icnf/serv/formularios/manif/man-cort-arr-arvor)</p>

Evidence Reviewed	Decreto Lei 198/2012 de 24/08 FATURAS E OUTROS DOCUMENTOS COM RELEVÂNCIA FISCAL) (http://info.portaldasfinancas.gov.pt/NR/rdonlyres/907FD2F4-9A9C-485D-8A99-FD164BF9FCEC/0/Decreto-Lei%20n%20 198 2012 24 08.pdf)
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	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	<p>In Portugal, around 97% of forest land is private (including land owned by individuals, communities and corporations). The remaining 3% are public (State) forests being one of the smallest public forest estates of any country in the world. This proportion means that the most part of the protected and classified areas are also private lands.</p> <p>Forest land tenure is based on one document (Description of the Land Registry) but several documents are used on the ground level as transitory or incomplete evidence, as the Description on the Land Registry is not updated for all lands. There are, however, regions (53% of territory) where there is a geometric cadastral survey of rural lands (Cadastró Geométrico da Propriedade Rústica) and so there is consistency between spatial and numeric information held by tax offices (matriz e secção da Caderneta Predial Rústica da repartição das finanças). In regions where there is no rural geometric cadastre (47% of the territory), the land tenure documents are based only on descriptions of boundaries and communications with neighbors. In the field, property borders are denoted with stone markers for only 75% of the registered land (this figure does not include the unknown proportion of marked land for which the owner is not known).</p> <p>The rural cadastral process is very complex and there are still areas where the land tenure situation lacks transparency. Big differences exist therefore between regions with or without the rural geometric cadastral survey, and also with or without marked borders. A modern estate cadastre has been initiated – based on geo-referenced data – with the multiple objectives of conformity to the land description, legal tenure and tax payments. This has to date been completed for 3% of the territory. Cadastral works are difficult and complex and even the modern process of cadastral works readily become chaotic. Challenges associated with cadastral works include the cost as well as the long timeframe. At the base there is a fiscal problem, as it is currently not possible for government to collect the land taxes of rural lands not covered by cadastre (IMI).</p> <p>While the scale of this issue is broad, the impact has been evaluated as limited. Despite the difficulties and complexities concerning land tenure and management rights (mainly due to the absence of geometric cadastre information), there is no significant evidence, at the national level, of conflicts or disputes about the issue.</p> <p>.</p>

Finding	<p>Besides land tenure, forest land use rights can be included in a Forest Renting/leasing contract (Contrato de Arrendamento Florestal), which must be communicated to tax authorities and these will send it to forest authorities.</p> <p>Based on the available information, it is considered that demonstration of legality of ownership and land use is a low risk requirement in Portugal.</p>
Means of Verification	<ul style="list-style-type: none"> • Description on the Land Registry (Descrição na Conservatória do Registo Predial) is the only official land tenure document. • Content certificate matrix article of tax office (Certidão de teor do artigo de Matriz da repartição de finanças) & land notebook (Caderneta predial) is the fiscal document which confirms taxes payment. • Judicial final and unappealable decision (Sentença judicial transitada em julgado). • Notarial deed (Escritura notarial). • Testament (Testamento) • Forest Renting/leasing contract (Contrato de Arrendamento Florestal) • For Collective or Commercial entities the extract from the commercial register (Certidão do Registo Comercial) to prove the specific responsibilities of owners/managers/presidents.
Evidence Reviewed	<p>Government sources:</p> <ul style="list-style-type: none"> • Constitution (<i>Constituição da República Portuguesa</i>) http://www.parlamento.pt/Legislacao/Documents/constpt2005.pdf • Cadastre at Direção Geral do Território: http://www.dgterritorio.pt/cadastro/cadastro_geometrico_da_propriedade_rustica_cgpr/_con_sultar_seccoes_cadastrais/ <p>Non-Government sources</p> <ul style="list-style-type: none"> • Transparency International's Corruption Perception Index 2014 at Transparency International -The global coalition against corruption – https://www.transparency.org/cpi2015/results • Worldwide Governance Indicators Report at World bank: http://info.worldbank.org/governance/wgi/index.aspx#reports • "O cadastro e a propriedade rustica em Portugal"; Fundação Francisco Manuel dos Santos e Rodrigo Sarmento de Beires, May/2013 (https://www.ffms.pt/upload/docs/o-cadastro-e-a-propriedade-rustica-em-portugal_ypUM5ASBAUmUpHUIgJtp0A.pdf) • "Cadastro a prédios rústicos e urbanos em Portugal custaria 700 ME"; Lusa-Última hora 27/03/2014 in Revista Visão: (http://visao.sapo.pt/lusa/cadastro-a-predios-rusticos-e-urbanos-em-portugal-custaria-700-me=f774740)

Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	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.
Finding	<p>Forest biomass feedstock definition on Portuguese legislation is included on legal framework created both for dedicated energetic generation plants and for residues purposes. In the first case definition forest biomass, consists of the biodegradable fraction products, waste and residues from biologic origin from the forest or other plantations. In this decree (Dec-Law 5/2011 of 10/01) it is stated that a joint legal ordinance from Agriculture and Energy Ministries should define what kind of feedstock could be used for forest biomass, but it wasn't found until the end of this report.</p> <p>For the residues purposes forest biomass is the vegetable matter from forestry and forestry waste, only including the material resulting from the improvement operations, including thinning and pruning, fuel management and harvesting of forest stands, as the branches, tree-tops, stumps, leaves, roots and bark.</p> <p>No permit is required for logging activities, including normal commercial silvicultural harvesting, the final cut and other. In fact a legal demanding is designed for cuttings for properties with areas below the size of obligatory Forest Management Plan, but it was not defined the details and so it is not in place (article 7th of Law n.º 33/96, at 17/08).</p> <p>Only an harvesting written notice (manifesto) is obligatory (for timber and cork), and may be submitted to forest authorities (ICNF) up to 30 days after the felling/extraction operation.</p> <p>Approval documentation is required relating to specific operations over cork (<i>Quercus suber</i>) and Holm oak (<i>Quercus rotundifolia</i>) including cuttings and prunings, Holly (<i>Ilex aquifolium</i>) cuttings, and also premature cuttings of Eucalyptus and Pinus pinaster or riparian area cuttings.</p> <p>In all areas it is obligatory to have an approved Environment Impact Assessment if forestation or reforestation is taking place with fast-growing plantations species covering over 350 ha or cutting and conversion to non-forest uses in an area greater than 50 ha.</p> <p>A National Action Plan for Control of Pine Wilt Disease (NMP in PT) <i>Bursaphelenchus xylophilus</i> and its vector insect <i>Monochamus galloprovincialis</i> is in place. This mostly focuses on Pinus pinaster (23% of all forest areas) but applies to all other host conifers: Abies spp., Cedrus spp., Larix spp., Picea spp., Pinus spp, Pseudotsuga spp., Tsuga spp. – with these species covering 8% of forests.</p>

Since the onset of the EUTR in 2013 enterprises classified as 'Operators' under the regulation have been required to register their activities on a Digital Platform managed by the Forest Authorities (ICNF) <http://www.icnf.pt/portal/florestas/fileiras/reg-op#reg>.

By April 2016 a total of 2762 Operators were registered in the country - of which only 34% had forest activities (forest producers, loggers & forest service providers, sawmills and timber traders).

In addition to the register, Operators must have due diligence system in place for each wood/timber acquisition, which includes procedures for access to information, risk assessment and risk mitigation.

Traders must maintain relevant information about suppliers and buyers of products as well as volumes traded. This information must be kept and be provided to competent authorities upon request.

The Competent Authority in Portugal for ensuring implementation of the EUTR is Institute for Nature Conservation and Forests (ICNF). The enforcement authority is the National Republican Guard (GNR) which conducts enforcement according to ICNF procedures.

Since the start of 2015 a far-reaching regime of inspections has begun. From January 2015 to April 2016 ICNF has conducted 113 inspections with no contraventions. Also for the same period GNR has conducted 265 inspections with one contravention.

As there is no permit required for ordinary forest harvesting, all attention is focused on referred exceptional cases:

- Cork Oak, Holm Oak and Holly operations and also riparian vegetation and protected areas
- Conversion from forest to plantations for areas larger than 350 ha or other uses for areas greater than 50 ha,;
- The National Action Plan for Control of NMP applies to all conifers and includes a strict phytosanitary plan which requires up-front registration of all operators and notification to authorities, prior to commencement of harvesting, transport and processing of wood (some of cuttings detailed on Action Plan are obligatory).
- In the case of premature cutting licenses no evidence was found in the ground of any implementation of this law.

According to the available information it is considered low risk the requirement of this indicator.

Means of Verification	<p>Written permit referring applicable legislation in all exceptional cases referred above; Operator registry and previous notification in cases of all conifers because of Nematode Pine Plan NMP;</p> <p>EUTR Operator Registry:</p> <ol style="list-style-type: none"> 1) Information about the wood/timber products which shall include quality, quantity, the supplier, origin country, and conformity with national legislation; 2) Risk evaluation- of the illegality of the timber by operator of the supply chain, based on the collected information. 3) Risk minimization - by additional information, verifications if the evaluation reveals specified risks.
Evidence Reviewed	<p>Cutting Permission in Law n.º 33/96, at 17/08 (article 7th) https://dre.pt/application/dir/pdf1sdip/1996/08/190A00/25682573.pdf</p> <p>Cork oak and Holm oak (<i>Quercus suber</i> and <i>Quercus rotundifolia</i>):</p> <ul style="list-style-type: none"> • DL155/2004, de 30/06 • DL 169/2001, de 25/05 <p><i>Ilex aquifolium</i>:</p> <ul style="list-style-type: none"> • DL 423/89, de 4/12 <p>Pinus Nematode:</p> <ul style="list-style-type: none"> • Dec.Retificação n.º 38/2015 de 01/09 • DL 123/15, at 3/07 • DL 95/2011, de 8/08 • DL 154/05 6/09 • Dec. n. 30-A/2011, de 7/10 <p>Cuttings before mature of <i>Pinus pinaster</i> and <i>Eucaliptus</i>:</p> <ul style="list-style-type: none"> • DL173/88,17/05 <p>Harvesting manifest:</p> <ul style="list-style-type: none"> • DL 174/88, 17/05 <p>Municipal licenses of vegetation destruction:</p> <ul style="list-style-type: none"> • DL 139/89 <p>High risk areas for harvesting:</p> <ul style="list-style-type: none"> • Desp. 17 282/2003 <p>Operational cuttings on forest regime areas:</p> <ul style="list-style-type: none"> • Desp. 18355/2008 <p>Riparian vegetation destruction:</p> <ul style="list-style-type: none"> • Law 54/2005 15/11 .

	<p>Environment law nº 19/14 de 14/04</p> <ul style="list-style-type: none"> • DL 151-B/2013 de 31/10 https://dre.pt/application/file/513900 • DL 49/05, de 24/02 • DL 197/2005, de 8/11 <p>Timber Operator Registry:</p> <ul style="list-style-type: none"> • DL76/2013 at 5/06 • EUTR: DL nº76/2013 de 5/06 artºs 3º, 8º at https://dre.pt/application/dir/pdf1sdip/2013/06/10800/0322203225.pdf • (UE)Regulation n.º 995/2010 artºs 4º, 5º, 6º http://www.icnf.pt/portal/florestas/fileiras/resource/docs/reg/regulamento-995-2010 <p>Waste and residues laws:</p> <p>http://www.pgdlisboa.pt/leis/lei_mostra_articulado.php?nid=981&tabela=lei_velhas&nversao=4&so_miolo=</p> <p>Energetic purposes forest biomass definition:</p> <p>https://dre.pt/application/conteudo/70064732</p> <p>https://dre.pt/application/dir/pdf1sdip/2011/01/00600/0017300175.pdf</p> <p>Government sources</p> <ul style="list-style-type: none"> • APA-Agência Portuguesa de Ambiente at http://apambiente.pt/index.php; • Municipalities at (<a href="http://www.cm-<NAME>.pt">http://www.cm-<NAME>.pt); • SEPNA-Serviço da Protecção da Natureza e do Ambiente/GNR- Guarda Nacional Republicana at (http://www.gnr.pt/default.asp?do=5r20n/DF.zv55n1/Zv55n1) • Instituto da Conservação da Natureza e Florestas at page http://www.icnf.pt/portal/florestas/fileiras/reg-op; • ICNF Report:(http://www.icnf.pt/portal/florestas/fileiras/resource/docs/icnf-ruem) <p>Non-Government sources</p> <p>ANEFA - Associação Nacional de Empresas Florestais, Agrícolas e do Ambiente at: http://www.anefa.pt•AIMMP– Associação das Indústrias de Madeira e Mobiliário de Portugal at: http://aimmp.pt/</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	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	<p>In Portugal it is not applicable payments for harvest rights and timber, including duties, relevant royalties and taxes related to timber harvesting such as stumpage fees and other volume based fees.</p> <p>Only taxes related to timber harvesting are applicable to all economic activities such as value added taxes (VAT) and income taxes (IRS and IRC).</p> <p>VAT (IVA) taxes:</p> <p>A normal tax rate of 23% VAT is applied to sale of wood. In special cases, a VAT reduction to 6% can be applied to the owner of 'standing wood' or 'standing stock sales'; or even VAT exemption if the owner is an agriculturalist or silviculturalist. Invoices must be issued by the seller, but self-invoicing by the buyer may occur in exceptional circumstances if some conditions are met (previous agreement, data conformity, etc). As no specific evidence of irregularity has been identified in relation to payment of VAT, this requirement is considered as Low risk. The payment of VAT is a simple requisition that is easy to verify and legally undertake by both entities (seller and buyer). The exceptional regimes of reduced taxes or exemption are in place to include the cases of forest owners with special profiles as agriculturalist or silviculturalist.</p> <p>Income taxes (IRS & IRC):</p> <p>Income taxes are applied according to individual or collective fiscal laws. It was not found any specific evidence of irregularities about income taxes related to harvest companies.</p> <p>Fiscal Authorities are Autoridade Tributária, which makes common inspections on roads together with GNR- Guarda Nacional Republicana.</p> <p>According to the available information, this indicator is classified as low risk.</p>
Means of Verification	<ul style="list-style-type: none"> Valid invoice/receipts Valid declaration of taxes non-debt IES_ Annual Declaration Proof of Annual declaration IRS/IRC Taxes Single Report <p>VAT Code CIVA:</p> <ul style="list-style-type: none"> DL n.º 102/2008, de 20/6: artº2º 1-a);artº9º 32)List I nº4. Anexo A- IV

Evidence Reviewed	<p>Individual Income Code to Singular Persons:</p> <ul style="list-style-type: none"> DL nº 442-A/88 artº4º nº3,nº4 Updated by Law nº67/2015, de 06/07 Preâ. nº9, artº3 nº1a);nº4; artº4º nº1, nº3 nº4 artº34º <p>Comercial Income Code to collective entities</p> <ul style="list-style-type: none"> DLnº 442-B/88 Updated by Law n.º 2/2014 de 16/12, Law nº3/2014 de 16/12 & Law nº4/2014 de 16/12 artº1º, artº2º, artº 3º, artº18º-nº7 ; artº20º nº1 g) artº23º nº2 k) Port. nº 55/2010 21/01 artº2º <p>Government sources</p> <ul style="list-style-type: none"> Autoridade Tributária e Aduaneira at: https://www.portaldasfinancas.gov.pt/pt/home.action Autoridade Tributária e Aduaneira: VAT Exemption and reduction at: http://info.portaldasfinancas.gov.pt/NR/rdonlyres/9A86386D-7EB8-447F-9EAC-CEB67C206BD2/0/INFORMA%C3%87%C3%83O.3526.pdf Autoridade Tributária e Aduaneira: Self invoicing by the buyer: http://info.portaldasfinancas.gov.pt/NR/rdonlyres/A4FB3349-0071-47FC-97EC-ADE2061C094A/0/Informacao_5332.pdf <p>Non-Government sources</p> <ul style="list-style-type: none"> ANEFA - Associação Nacional de Empresas Florestais, Agrícolas e do Ambiente at: http://www.anefa.pt/ AIMMP– Associação das Indústrias de Madeira e Mobiliário de Portugal at: http://aimmp.pt/ AIFF – Associação para a Competitividade da Indústria da Fileira Florestal at: http://www.aiff.org.pt/ OCC-Ordem dos Contabilistas Certificados at http://www.otoc.pt/pt/a-ordem/
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	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	There are no trees in Portugal belonging to CITES annexes. No direct effect of harvesting or forest management over CITES listed species has been identified.
Means of Verification	List of purchased species
Evidence Reviewed	<p>Portuguese legislation:</p> <ul style="list-style-type: none"> • DL211/2009, 03/09, artº2º, artº4ºartº9º, artº13º • Port nº1225/2009 de 12/10 ; Portaria nº 1226/2009 de 12/10 • Port nº 7/2010 de 05/01 •Port. 60/2012 de 19/03 <p>EU legislation:</p> <ul style="list-style-type: none"> • Council Regulation (EC) No 338/97 of 9 December 1996 on the protection of species of wild fauna and flora by regulating trade therein, article 4, 5, 7, 8 (http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:1997R0338:20080411:EN:PDF) • Date of CITES application on EU: JOUE L 189, de 2015-07-17 • European Union page at: http://ec.europa.eu/environment/cites/pdf/trade_regulations/KH7707262PTC.pdf <p>CITES</p> <ul style="list-style-type: none"> • ICNF page: http://www.icnf.pt/portal/icnf/serv/formularios/cites • CITES Reports: https://cites.org/sites/default/files/reports/13-14Portugal.pdf
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	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	<p>Portugal and Portuguese forest sector is not associated with violent armed conflict, including that which threatens national or regional security and/or linked to military control.</p> <p>The country is not covered by a UN security ban on exporting timber or any other international ban on timber export, also there are not individuals or entities involved in the forest sector that are facing UN sanctions.</p> <p>Portugal is well positioned at all international reports:</p> <ul style="list-style-type: none"> • Corruption Perception Index scores 63 meaning low perceived level of corruption; • Worldwide Governance Indicators (WGI) from 73.3 to 84.13 (1-100points) <p>The WGI report six aggregate governance indicators for over 200 countries and territories over the period 1996-2014, covering 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.</p> <p>On the other side Portugal (including human rights, illegal logging , forest and timber) is not listed in alarming reports or indexes such as:</p> <ul style="list-style-type: none"> • Committee to Protect Journalists Impunity Index; • Human Rights Watch; • Global Witness • Chattham House • Amnesty International <p>There are no indigenous or traditional people in Portugal who could claim traditional rights to lands, forests and other resources, based on long established custom or traditional occupation and use. Instead, there are rights to pass in public roads and ways, across the coast or rivers. In Portugal getting in forest lands is not considered as an invasion even on private properties, and there is common use of wild products by communities (mushrooms, asparagus, snails, besides fishing on public waters). However, some conditions may occur about game concessions or cattle farms.</p> <p>Labour rights are respected including rights as specified in ILO Fundamental Principles and Rights at work. Portugal has ratified all 8 Fundamental ILO Conventions.</p> <p>According to the available information, this indicator is classified as low risk.</p>

Means of Verification	<ul style="list-style-type: none"> • Identity card of workers. • Valid written contract. • Valid visa and residence working permit for foreigners out of EU, Iceland, Liechtenstein, Norway, Turkey, Brasil (with equality rights status), Cabo Verde, Guiné Bissau, São Tomé e Príncipe. • Obligatory insurance document. • Updated document of social security payment • IRS /IRC taxes - Relatório Único.
Evidence Reviewed	<ul style="list-style-type: none"> •Transparency International http://www.transparency.org/cpi2015#map-container •UN Sanctions List at:https://www.un.org/sc/suborg/en/sanctions/un-sc-consolidated-list •World Bank: Worldwide Governance Indicators http://info.worldbank.org/governance/wgi/index.aspx#countryReports •Committee to Protect Journalists https://www.cpi.org/reports/2014/04/impunity-index-getting-away-with-murder.php •Human Rights Watch: http://www.hrw.org/world-report/2015 •Global Witness: www.globalwitness.org Chattam House Illegal Logging Indicators Country Report Card http://www.illegal-logging.info •Amnesty International:https://www.amnesty.org/en/documents/pol10/0001/2015/en/ <p>Labour Code:</p> <ul style="list-style-type: none"> •Law n.º 7/09 12/02 cap I and updates like Lei 69/13, de 30/08 includes obligatory professional training (http://www.act.gov.pt/(pt-PT)/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx) •Republic Assembly Resolution nº109/2012 de 08/08 art 6º (Convention 184 doesn't apply to industrial forest work) •ILO Convention numbers 87, 98, 29, 105, 100, 101,129 e 138, 184 (http://dre.pt/util/getpdf.asp?s=diad&serie=1&idder=2012.153&iddip=20121525) •Foreign workers: Law n.º 23/2007 at 04/07 artº59º 5a) and updates (http://www.pgdlisboa.pt/leis/lei_mostra_articulado.php?nid=920&tabela=leis&so_miolo) •Labour Conditions Authority-ACT http://www.act.gov.pt/(pt-PT)/Paginas/default.aspx. •Ministry of Solidarity, Employment and Social Security http://www.portugal.gov.pt/pt/ministerios/mtsss.aspx •Employment and Professional Training Institute at https://www.iefp.pt/ •Ministry of Internal Administration http://www.portugal.gov.pt/pt/ministerios/mai/equipa.aspx Immigration And Borders Services http://www.sef.pt/portal/V10/EN/asp/page.aspx

Evidence Reviewed	<ul style="list-style-type: none"> •SETAA-Sindicato da Agriculture, Alimentação e Florestas: at http://www.setaa.pt/ •UGT-União Geral de Trabalhadores at https://www.ugt.pt/ •CGTP - Confederação Geral de Trabalhadores Portugueses at http://www.cgtp.pt/ •ANEFA - Associação Nacional de Empresas Florestais, Agrícolas e do Ambiente at: http://www.anefa.pt/ •UNAC - União da Floresta Mediterrânica http://www.unac.pt/ •Forum Florestal- Estrutura Federativa da Floresta Portuguesa at http://forumflorestal.pt/ •Forestis- Associação Florestal de Portugal http://www.forestis.pt/ •FNAPF- Federação Nacional das Associações de Proprietários Florestais http://www.fnapf.pt/ •Confagri-Confederação Nacional das Cooperativas Agrícolas e do Crédito Agrícola de Portugal, CCRL at http://www.confagri.pt/ •CNA - Confederação Nacional de Agricultura at http://www.cna.pt/ •CAP- Confederação dos Agricultores de Portugal http://www.cap.pt/ •BALADI- Federação Nacional dos Baldios https://www.facebook.com/Federa%C3%A7%C3%A3o-Nacional-dos-Baldios-257792997725879/
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	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	<p>There is a legal framework which includes the need of identification and map all national Natural Values by national authorities with a deadline of October 2017.</p> <p>HCV used for the current Risk Analysis are based on those defined for FSC in Portugal by FSC Portugal, updated by Portugal CW CNRA:</p> <p>HCV 1: Classified Areas (1.1), Protected species with threatened status (1.2), Endemic species (1.3), critical seasonal use areas (1.4) and critical connectivity forests areas (1.5).</p> <p>HCV1.1- Classified areas include the following type of areas:</p> <ul style="list-style-type: none"> -Classified areas of the National System of Classified areas which include Protected Areas, Natura2000 areas and also all areas included on International conventions ratified by Portuguese state as RAMSAR sites, biogenetical and biosphere reserves. -IBA's – Important Bird and Biodiversity Areas <p>HCV 1.2 – Protected species with threatened status include:</p> <ul style="list-style-type: none"> -Endangered species according to the classification adopted by the International Union for the Conservation of Nature (IUCN) to endangered species: critically endangered (CR), Endangered (EN) and vulnerable (VU); - In addition to those are also considered protected species contained in the legal conservation instruments in force in Portugal (Habitat and Birds Directives, CITES, Bern Convention, Bonn Convention), which may not be integrated into threat categories above. <p>HCV 1.3 - Endemic species includes</p> <ul style="list-style-type: none"> - species whose distribution is exclusively on the Portuguese territory; <p>HCV1.4 Critical seasonal use areas including critical areas of refuge, breeding or migration routes in Portuguese territory</p> <ul style="list-style-type: none"> - Autumn migration corridors of birds in the Southwest Alentejo and Costa Vicentina Region; - Areas of concentration and passage of steppe birds (bustard, little bustard); - Preys breeding areas with threatened status; - Concentration in wetland wintering birds; - Bats refugees considered important to national, regional and local scale.

Finding	<p>HCV3: Areas included or containing rare ecosystems, threatened or endangered (classified as priority habitats by Natura 2000).</p> <p>Priority classified habitats, are found inside and outside classified areas.</p> <p>HCV4: Areas that provide basic services in critical situations, like flood protection in river basins, soil conservation and protective against forest fires.</p> <p>These areas include:</p> <ul style="list-style-type: none"> - forests located in critical areas in river basins, such as floodplains and sloping areas, as defined and mapped in REN-National Ecological Reserve. -critical areas to prevent forest fires including low combustibility plots and strips. <p>HCV5: Forest areas fundamental to meeting basic needs of local communities, like aquifers with recharge rates greater than 175 mm / year covered by cork oak and holm oak stands, assuming that these settlements contribute to the infiltration of water for consumption, and regulate the hydrological cycle and prevent soil erosion.</p> <p>HCV6 – Critical forest areas to local communities' traditional cultural identity, as near and/or adjacent to national classified monuments, and also trees and stands classified as public interest according to Law No. 53/2012 of September 5th.</p> <p>According to this definition all the HCV areas are conceptually defined, but not all of them are identified or mapped.</p> <p>Mapped areas on digital (vector and/or raster format) include:</p> <ul style="list-style-type: none"> - all classified areas described as HCV1.1, HCV 1.5, HCV2, HCV4, HCV5, HCV 6. - some of the areas described as HCV 1.2, HCV 1.3, HCV1.4; HCV3. These areas should be mapped inside FSC and PEFC certified areas and also where any territory Plan (for example Forest Management Plan, Game Management Plan) is sufficiently recent, detailed and accurate. <p>Therefore, according to the available information there are specified risks that important species or habitats are not identified and mapped as following:</p> <ul style="list-style-type: none"> - HCV 1.2 -Endangered species according to the classification adopted by the International Union for the Conservation of Nature (IUCN) to endangered species: critically endangered (CR), Endangered (EN) and vulnerable (VU). And also protected species contained in the legal conservation instruments in force in Portugal (Habitat and Birds Directives, CITES, Bern Convention, Bonn Convention), which may not be integrated into threat categories above; - HCV 1.3 -Endemic species - HCV 1.4 - Critical seasonal use areas including critical areas of refuge, breeding or migration routes in Portuguese territory, detailed above.
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Finding	<p>HCV3- Areas included or containing rare ecosystems, threatened or endangered (classified as priority habitats by Natura 2000), found inside and outside classified areas.</p> <p>All the other areas are identified and mapped so they are low risk according to this indicator</p>
Means of Verification	<ul style="list-style-type: none"> -Internet research -GIS maps of HCV areas -Interviews -Priority Classified Habitat and species catalogue. -Regional, publicly available data from a credible third party as FSC and PEFC reports
Evidence Reviewed	<p>Law for natural values cadastre: Decree-Law n.º 242/2015 at 15/10 https://dre.pt/application/conteudo/70693924</p> <p>Bugalho, M. 2011 "Interpretação Nacional das Florestas de Alto Valor de Conservação" <i>Documento de base Trabalhos realizados pelo GT IN FAVC do FSC Portugal</i></p> <p>HABEAS: http://www.habeas-med.org/webgis/pt_en/</p> <p>LEAF_EPICWebGiSPortugal: http://epic-webgis-portugal.isa.ulisboa.pt/maps/epic?format=image/png;%20mode=8bit&startExtent=-1523000.4400000,-143668.5180000</p> <p>SNAC : Legislation https://dre.pt/application/file/70698029</p> <p>RNAP: http://www.icnf.pt/portal/ap/ap</p> <p>Rede Natura 2000: http://www.icnf.pt/portal/naturaclas/rn2000</p> <p>Important Bird Areas of Portugal at: http://ibas-terrestres.spea.pt/</p> <ul style="list-style-type: none"> - Site characterization SIC e ZPE: http://www.icnf.pt/portal/naturaclas/rn2000/p-set/Plan-set-docs Cartography: http://www.icnf.pt/portal/naturaclas/cart -Protected area plans: http://www.icnf.pt/portal/naturaclas/ordgest/poap -Data Base for fauna and flora specific plans: http://www.icnf.pt/portal/naturaclas/patrinatur/especies -Red book for Portuguese Vertebrates (2005): http://www.icnf.pt/portal/naturaclas/patrinatur/lv - Nesting and wintering Bird Atlas on Portugal (2008): ND online Cartography (2015) http://webgis.spea.pt/AtlasAvesInvernantesMigradoras/ - Reptile and amphibious of Portugal (2008): http://www.icnf.pt/portal/naturaclas/patrinatur/atlas-anfi-rept/anfibios - Fresh water Fish National cartography :http://www.cartapiscicola.org/# - Flora identification: http://www.icnf.pt/portal/naturaclas/rn2000/p-set/psrn-flora -Flora cartographic source: http://www.flora-on.pt/

Evidence Reviewed	<p>-National Conservation Plano of threatened Flora information http://www.icnf.pt/portal/naturaclas/patrinatur/conserv-flora-perigo http://naturdata.com/index.php?option=com_content&view=article&id=78&Itemid=60 Electric wire line manual (ICNB 2008) :http://www.icnf.pt/portal/naturaclas/ordgest/aa/resource/doc/man-infra-lin Regional Forest Plans (PROF): http://www.icnf.pt/portal/florestas/profs AIIF: http://www.aiff.org.pt/assets/ESTUDO_Prospetivo_Sector-Florestal.pdf AIIF: http://www.aiff.org.pt/assets/Relatorio-de-Characterizacao-da-Fileira-Florestal-2014-160p-CAPA-3-spread....pdf ICNF: http://www.icnf.pt/portal/florestas/ifn/resource/ficheiros/ifn/ifn6-res-prelimv1-1 UNECE: https://www.unece.org/fileadmin/DAM/publications/timber/Forest_Europe_report_2011_web.pdf ICNF: http://www.icnf.pt/portal/florestas/dfci/Resource/doc/rel/2013/relatorio-dfci-ap-2013 ICNF: http://www.icnf.pt/portal/florestas/dfci/relat/raa/resource/ficheiros/ree2012/rel-recup-inc-catraia-set-v5 ICNF http://www.icnf.pt/portal/florestas/dfci/relat/raa/resource/ficheiros/rel-tec/picoes-rel-tecn WILDER: http://www.wilder.pt/historias/pedida-actualizacao-de-lei-com-16-anos-sobre-especies-invasoras/ QUERCUS: http://www.quercus.pt/comunicados/2009/maio/924-especies-invasoras-continuam-sem-controlo UNECE https://www.unece.org/fileadmin/DAM/publications/timber/Forest_Europe_report_2011_web.pdf Martins M.J & Cerdeira, J.O. (2009) A Language and Environment for Statistical Computing. Vienna, Austria, R Foundation for Statistical Computing; & Autoridade Florestal Nacional, 2010, Florestat – Aplicação para a Consulta dos Resultados do 5º Inventário Florestal Nacional. Disponível em http://www.icnf.pt/portal/florestas/ifn/ifn5/florestat in Habeas - Habeas-Hotspot Areas for Biodiversity and Ecosystem Services http://www.habeas-med.org/webgis/pt_en/ ICNF: http://www.icnf.pt/portal/florestas/ifn/resource/ficheiros/ifn/ifn6-term-def APFC: http://www.apfc.pt/xms/files/Eventos/Projetos/APFC_para_a_sanidade.pdf INIAV: http://www.iniaiv.pt/fotos/gca/livro_causas_doc_sintese_1369127896.pdf ICNF: http://www.icnf.pt/portal/florestas/foflo/pdr2020/resource/doc/Areas-rrc-v-final.pdf Planos de Gestão Florestal de áreas públicas: http://www.icnf.pt/portal/florestas/gf/pgf/publicitacoes/encerradas </p>
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Evidence Reviewed	<p>Kirkby, M.J <i>et all</i>. European Soil Bureau Research Report No.16, EUR 21176, 18pp. and 1 map in ISO B1 format. Office for Official Publications of the European Communities, Luxembourg. European Soil Portal, 2013, http://eusoils.jrc.ec.europa.eu/ESDB_Archive/eusoils_docs/esb_rr/n16_ThePeseraMapBkLet52.pdf</p> <p>Autoridade Florestal Nacional, 2010, Florestat – Aplicação para a Consulta dos Resultados do 5º Inventário Florestal Nacional. Disponível em http://www.icnf.pt/portal/florestas/ifn/ifn5/florestat</p> <p>Reserva Ecológica Nacional https://dre.pt/application/dir/pdf1sdip/2012/11/21200/0630806346.pdf</p> <p>Sistema Nacional de Defesa da Floresta Contra Incêndios: https://dre.pt/application/dir/pdf1sdip/2006/06/123A00/45864599.pdf ICNF</p> <p>http://www.icnf.pt/portal/florestas/dpci/relat/raa/resource/ficheiros/ree2012/rel-recup-inc-catraia-set-v5</p> <p>PANCD https://dre.pt/application/file/65985917</p> <p>PDR2020 http://www.pdr-2020.pt/site/O-PDR2020/Arquitetura/Area-3-Ambiente-Eficiencia-no-Uso-dos-Recursos-e-Clima/Medida-7-Agricultura-e-Recursos-Naturais/Acao-7.11-Investimentos-nao-produtivos/Operacao-7.11.1-Investimentos-nao-produtivos</p> <p>Fundo Florestal Permanente:http://www.icnf.pt/portal/icnf/noticias/gloablnews/fundo-florestal-permanente-ffp</p> <p>Alves, A. M., Pereira, J. S., Correia, A. V., 2012. Silvicultura - A gestão dos ecossistemas florestais. Fundação Calouste Gulbenkian.</p> <p>ICNF http://www.icnf.pt/portal/florestas/aip/aip-monum-pt</p> <p>DRE: http://www.icnf.pt/portal/icnf/legisl/legislacao/2012/lei-n.o-53-2012-de-5-de-setembro.-d.-r.-n.o-172-serie-i</p>
Risk Rating	<div> <input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA </div>
Comment or Mitigation Measure	<ul style="list-style-type: none"> Suppliers Qualification and Control Program (PSI 16 -Programa de Qualificação e Controlo Fornecedores), including consultation of cartography and others information sources, and verification that forests and other areas with high conservation values (HCV), specifically HCV 1.2, HCV 1.3, HCV 1.4 and HCV 3, are identified and mapped. Disqualify material coming from areas where high conservation values are not identified and mapped.

	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	<p><u>HCV1</u></p> <p>In Portugal, significant biodiversity values are covered by the National System Classified Areas and the IBA's (English Important Bird and Biodiversity Areas).</p> <p>A significant part of the conservation values identified in HCV 1 is threatened by forest operations in terms of removal, habitat fragmentation and destruction.</p> <p>The main source of these risks is the conversion to plantations of exotic species and non-forest uses (see indicator 2.1.3 below), although on a different scale, other forest management operations can affect the identified values, such operations of maintenance and logging.</p> <p>Conversely, the lack of forest management and abandonment causes negative impact on different habitats, as they increase the risk of disturbances by biotic and abiotic factors such as fire, plagues and invasive species. These disturbances by biotic and abiotic agents affect existing habitats in protected and classified areas considering the fact that Portugal is the European country with the highest proportion of area affected by disturbances (24.5%) as stated in UNECE report (2011). In this report disturbances include abiotic and biotic factors such as pests and insects, fires, drought, grazing among others.</p> <p>In short, the different conservation attributes described in the various subcategories of HCV1 are concentrated mainly in Classified Areas by SNAC and the IBA's.</p> <p>However there are threats to conservation attributes resulting from forestry operations in Classified Areas and IBA's which are not included in the National Network of Protected Areas RNAP (2/3 of the total area is not included) and its safeguards are not proportional to the magnitude of these threats:</p> <ul style="list-style-type: none"> • there aren't Site Management Plans or a consistent program of dissemination of good practices on forest areas classified Natura 2000, involving the referred agents; • the areas are not identified on the ground or in their access; • there is not a close inspection regime implemented properly and consistently throughout the national territory; <p>In the case of forest areas included in the RNAP, there is further consolidation in the field over time, which provides more proportionate safeguards to the level of existing threats:</p>

- there are information boards in many of the surrounding access to protected areas;
- There are Management Plans which are already in the second generation in most cases;
- There is a history of proximity to the population and those involved in forest management, because they were stabilised long time ago and over time have provided personalized services for each protected area, related to its own management and "command and control" services included nature or forest body guards or watchmen.
- There are more details in the information published about the effects of disturbances such as fires on habitats.

HCV2

The regulation implemented in Portugal on oak and holm trees and stands, includes a comprehensive legislative framework with a legal action planning and project but also cuttings protection. This legislation also meet forest management measures themselves related to intensity of exploitation, such as the stripping and pruning.

This regulation is relatively well established and disclosed have being assimilated by the various agents involved as owners, managers, and operators. Also the planned forest management and the proper certification of sustainable forest management expanded in Portugal in recent years is currently counting about 236 000 hectares certified forests entering the cork and holm oak species (is not robust statistics on the certified specific area with cork oak stands).

Following several surveys on the fragilised state of cork and holm oak stands, there were also developed various processes to improve forest management practices, which were disclosed by the various entities involved. This includes a variety of contents and formats such as codes of good cork forest practices but also pest and disease identification guides. More recent investment lines have been created supported by EU grants to assist owners and managers in pest monitoring of cork and holm oak stands (Operation 8.1.3 - Prevention of forest against biotic and abiotic agents) and for health recovery and restoration of forest stands of cork oak (Operation 8.1.4 - forest Restoration affected by biotic and abiotic agents or catastrophic events).

The most current detailed results achieved by management and improvement actions on forest stands are not fully known, since the full values of the last national inventory (IFN6) are still missing, however it is known that the class of "wooded area with cork oak" had an increase of 6% from 1995 to 2010, and holm oak has decreased 3% in the same period.

HCV3

Priority habitats are protected by a legal framework, but their protection on the ground is not strong, except when they are located inside Protected areas.

The threats caused by forest management activities on priority habitats are related to the destruction of the habitat itself by logging, applying in this case the habitats with timber species and also the impacts on understory habitats or surrounding areas.

In the first case, where there are risks of logging of forest species which are themselves the priority habitats and are classified as for example 2270 dunes with *Pinus pinea* forests and / or *Pinus pinaster*, 91E0 alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (Alno-Padion, Alnion incanae, Salicion albae), 2250 Coastal dunes with *Juniperus* spp., 5230 Arborescent matorral with *Laurus nobilis*, 9560 Endemic Mediterranean forests with *Juniperus* spp., 9580 Mediterranean forests of *Taxus baccata*, among others.

In the second group are found many understory habitats.

As an example the priority habitat 2270 is briefly characterized by sand dunes Mediterranean pine forests, occurs in a stripe within the sea 15Km and the Tagus and Sado and is dominated by:

- Pinus pinaster* that have not been subject, in the past 20 years, to operations in understory and may be mature plantings (> 80 years) or regeneration of pine forests (> 30 years).

- Pinus pinea* in dune systems in the Algarve, with evolved matorral.

Since both species are exploited for timber (the stone pine is also exploited for pine cone) and the maritime pine is one of the woody species most exploited in Portugal, this habitat is subject to threats of exploitation as cutting and thinning but also all understory operations. That's why its conservation state is considered by ICNF as inadequate/unfavourable from 2008 to 2013.

HCV 4 & HCV 5

There are threats to forests located in critical areas in river basins, such as floodplains and steep areas, and aquifers as defined and mapped in REN-National Ecologic Reserve. Many of these threats include the conversion to forest plantations or other non-forest uses, and are addressed at following indicator 2.1.3.

It has been identified very negative effects as a consequence of large forest fires on the river basin, affecting qualitative and quantitative hydrological flows in the following periods. In such cases the forest authorities (ICNF) develop and promote specific plans for the recovery of burned areas with precise information on the destinations of the timber.

There are also threats of lesser magnitude caused in private forests, arising from inadequate operations of harvesting and / or maintenance. These operations include tools, interventions and inadequate intensity to the sensitivity of soils and vegetation in these critical areas to the protection of floods. However, the reduced scale of the most forest operations contributes to the reduction of the magnitude of the identified risks.

Existing safeguards to prevent these threats of critical forest areas for watershed protection, includes the existing legal framework, the available EU grants and also the non-commercial nature of some of the species that make up these forest areas.

Legal framework includes the protection of riparian species and essentially the National Ecological Reserve.

	<p>These rules have been implemented through various instruments and regulations, which explicitly reached the forest owners and managers through PROF, PGF, PUB and PEIF.</p> <p>However, legal framework doesn't include any limitation over maximum area of clearcutting methods in Portugal, and this is considered a threat to soil and water protection (among others).</p> <p><u>HCV₆</u></p> <p>Classified trees and stands as public interest are protected by law, and the legal protection of monuments includes sometimes gardening forest and surrounding areas. It is considered there are no significant threats by the forest management activities to HCV6 present in the analysis area.</p> <p>Resuming</p> <p>In Portugal potential threats to forest and other HCV areas from forest management activities can be found in both of the areas where the HCV were identified and also where the HCV were not identified.</p> <p>This situation is the result of the absence of a forest cuttings policy for commercial felling in the country, among other situations related to legislation and its enforcement.</p> <p>Risk Conclusion</p> <p>HCV 1- In private and communitarian forest areas classified by the National System of Classified Areas (SNAC) and in the forest areas considered IBAs (Important Bird and Biodiversity Areas), not covered by the National Network of Protected Areas RNAP, there are specified risks that HCV1 attributes are threatened by forest management operations such as harvesting or maintenance.</p> <p>HCV 2- Is well identified in the country as well as its threats. It is considered that the existing safeguards are sufficient to reduce the risks posed by these threats, so there is a low risk involved.</p> <p>HVC 3 - It is considered that the threats on priority habitats on private and communitarian, and public forest areas not managed by ICNF, are not properly safeguarded by existing safeguards, and so there is a specific risk that they were threatened by forest operations.</p> <p>HCV4 & HCV5 - It is considered specified the risk on private, communitarian, and public forest areas not managed by ICNF, subject to exploitation by clear cutting at dimensions above to the maximum area indicated for each region by PROF Regional Forestry Management Plan.</p> <p>HCV 6 –Low risk.</p>
Means of Verification	<p>FSC or PEFC Forest management certificate public reports</p> <p>Forest Management plan as PGF, PUB, PEIF</p> <p>Game management plans</p> <p>Regional Forest Plans</p>

	<p>Forest Best Management Practices</p> <p>Forest Operating Procedures</p> <p>Records of BPs' field inspections</p> <p>Monitoring records</p> <p>Interviews with staff</p> <p>Publicly available information on the protection of the values identified</p> <p>Regional, publicly available data from credible third parties</p>
Evidence Reviewed	<p><i>Bugalho, M. 2011 "Interpretação Nacional das Florestas de Alto Valor de Conservação"</i> <i>Documento de base Trabalhos realizados pelo GT IN FAVC do FSC Portugal</i></p> <p>HABEAS: http://www.habeas-med.org/webgis/pt_en/</p> <p>LEAF_EPICWebGiSPortugal: http://epic-webgis-portugal.isa.ulisboa.pt/maps/epic?format=image/png:%20mode=8bit&startExtent=-1523000,4400000,-143668,5180000</p> <p>SNAC : Legislation https://dre.pt/application/file/70698029</p> <p>RNAP: http://www.icnf.pt/portal/ap/ap</p> <p>Rede Natura 2000: http://www.icnf.pt/portal/naturaclas/rn2000</p> <p>Important Bird Areas of Portugal at :http://ibas-terrestres.spea.pt/</p> <p>- Site characterization SIC e ZPE: http://www.icnf.pt/portal/naturaclas/rn2000/p-set/Plan-set-docs</p> <p>Cartography :http://www.icnf.pt/portal/naturaclas/cart</p> <p>-Protected area plans: http://www.icnf.pt/portal/naturaclas/ordgest/poap</p> <p>-Data Base for fauna and flora specific plans: http://www.icnf.pt/portal/naturaclas/patrinatur/especies</p> <p>-Red book for Portuguese Vertebrates (2005): http://www.icnf.pt/portal/naturaclas/patrinatur/lvv</p> <p>- Nesting and wintering Bird Atlas on Portugal (2008): ND online Cartography (2015) http://webgis.spea.pt/AtlasAvesInvernantesMigradoras/</p> <p>- Reptile and amphibious of Portugal (2008): http://www.icnf.pt/portal/naturaclas/patrinatur/atlas-anfi-rept/anfibios</p> <p>- Fresh water Fish National cartography :http://www.cartapiscicola.org/#</p> <p>- Flora identification: http://www.icnf.pt/portal/naturaclas/rn2000/p-set/psrn-flora</p> <p>-Flora cartographic source: http://www.flora-on.pt/</p> <p>-National Conservation Plano of threatened Flora information http://www.icnf.pt/portal/naturaclas/patrinatur/conserv-flora-perigo http://naturdata.com/index.php?option=com_content&view=article&id=78&Itemid=60</p> <p>Electric wire line manual (ICNB 2008)</p>

[:http://www.icnf.pt/portal/naturaclas/ordgest/aa/resource/doc/man-infra-lin](http://www.icnf.pt/portal/naturaclas/ordgest/aa/resource/doc/man-infra-lin)

Regional Forest Plans (PROF): <http://www.icnf.pt/portal/florestas/profs>

AIIF: http://www.aiff.org.pt/assets/ESTUDO_Prospetivo_Sector-Florestal.pdf

AIIF: <http://www.aiff.org.pt/assets/Relatorio-de-Characterizacao-da-Fileira-Florestal-2014-160p-CAPA-3-spread....pdf>

ICNF: <http://www.icnf.pt/portal/florestas/ifn/resource/ficheiros/ifn/ifn6-res-prelimv1-1>

UNECE:
https://www.unece.org/fileadmin/DAM/publications/timber/Forest_Europe_report_2011_web.pdf

ICNF: <http://www.icnf.pt/portal/florestas/dfci/Resource/doc/rel/2013/relatorio-dfci-ap-2013>

ICNF: <http://www.icnf.pt/portal/florestas/dfci/relat/raa/resource/ficheiros/ree2012/rel-recup-inc-catraia-set-v5>

ICNF <http://www.icnf.pt/portal/florestas/dfci/relat/raa/resource/ficheiros/rel-tec/picoes-rel-tecn>

WILDER: <http://www.wilder.pt/historias/pedida-actualizacao-de-lei-com-16-anos-sobre-especies-invasoras/>

QUERCUS: <http://www.quercus.pt/comunicados/2009/maio/924-especies-invasoras-continuam-sem-controlo>

UNECE
https://www.unece.org/fileadmin/DAM/publications/timber/Forest_Europe_report_2011_web.pdf

Good Forest Practices <http://www.icnf.pt/portal/florestas/gf/documentos-tecnicos/resource/doc/Boas-Praticas-Florestais.pdf>

Martins M.J & Cerdeira, J.O. (2009) do Departamento de Matemática do Instituto Superior de Agronomia. Referências R Core Development Team, 2009, R: A Language and Environment for Statistical Computing. Vienna, Austria, R Foundation for Statistical Computing; & Autoridade Florestal Nacional, 2010, Florestat – Aplicação para a Consulta dos Resultados do 5º Inventário Florestal Nacional. in

Habeas - Habeas-Hotspot Areas for Biodiversity and Ecosystem Services
http://www.habeas-med.org/webgis/pt_en/

APFC: http://www.apfc.pt/xms/files/Eventos/Projetos_APFC_para_a_sanidade.pdf

INIAV: http://www.iniaiv.pt/fotos/gca/livro_causas_doc_sintese_1369127896.pdf

ICNF: <http://www.icnf.pt/portal/florestas/foflo/pdr2020/resource/doc/Areas-rrc-v-final.pdf>

Planos de Gestão Florestal de áreas públicas:
<http://www.icnf.pt/portal/florestas/gf/pgf/publicitacoes/encerradas>

Autoridade Florestal Nacional, 2010, Florestat – Aplicação para a Consulta dos Resultados do 5º Inventário Florestal Nacional. Disponível em
<http://www.icnf.pt/portal/florestas/ifn/ifn5/rel-fin>

	<p>ICNF http://www.icnf.pt/portal/florestas/dfci/relat/raa/resource/ficheiros/ree2012/rel-recup-inc-catraia-set-v5</p> <p>PANCD https://dre.pt/application/file/65985917</p> <p>PDR2020 http://www.pdr-2020.pt/site/O-PDR2020/Arquitetura/Area-3-Ambiente-Eficiencia-no-Uso-dos-Recursos-e-Clima/Medida-7-Agricultura-e-Recursos-Naturais/Acao-7.11-Investimentos-nao-produtivos/Operacao-7.11.1-Investimentos-nao-produtivos</p> <p>Fundo Florestal Permanente: http://www.icnf.pt/portal/icnf/noticias/gloablnews/fundo-florestal-permanente-ffp</p> <p>Alves, A. M., Pereira, J. S., Correia, A. V., 2012. <i>Silvicultura - A gestão dos ecossistemas florestais</i>. Fundação Calouste Gulbenkian. Capítulo 5</p> <p>"Condenação de Aprígio Santo", Comunicado - s, 23/02/12 at Almargem-Associação de Defesa do Património Cultural e Ambiental do Algarve https://www.facebook.com/associacaoalmargem/notes</p> <p>"Abate de sobreiros na Zona de Protecção Especial do Estuário de Tejo em Benavente" 19/06/2014, Quercus - Associação Nacional de Conservação da Natureza at (http://www.quercus.pt/comunicados-floresta/644-2014/3708-abate-de-sobreiros-na-zona-de-proteccao-especial-do-estuário-de-tejo-em-benavente)</p> <p>•"Zona de Protecção Especial do Estuário do Tejo ameaçada por novas áreas turísticas" 22/05/2014, Quercus - Associação Nacional de Conservação da Natureza at (http://www.quercus.pt/comunicados-floresta/644-2014/3652-zona-de-protecao-especial-do-estuário-do-tejo-ameacada-por-novas-areas-turisticas)</p> <p>Acescimo http://acrescimoapif.blogspot.pt/2012/08/porque-ardem-as-florestas-em-portugal.html</p> <p>Lourenço, L e Outros (2011) Causas de incêndios florestais em Portugal continental. Análise estatística da investigação efetuada no último quinquénio (1996 a 2010)</p> <p>QUERCUS http://www.quercus.pt/comunicados/2015/agosto/4419-politicas-publicas-desajustadas-favorecem-incendios</p> <p>"Butwell condenada por crime contra a Natureza e desobediência qualificada na Ria de Alvor" Rodrigues, E. 11/07/2015 at Sulinformação http://www.sulinformacao.pt/2015/07/butwell-condenada-por-crime-contra-a-natureza-e-desobediencia-qualificada-ria-de-alvor/</p>
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

Comment or Mitigation Measure	<ul style="list-style-type: none">• Consultation of information sources regarding HCVs.• Procedures for conduct specific field audits to identify and address real and potential threats to forests and other areas with high conservation values, specifically HCV 1, HCV 2, HCV 3 and HCV 4, which were previously identified and mapped.• Disqualify material coming from areas where forest management and operations represent evident threats to HCV 1, HCV 2, HCV 3 and HCV 4.• Promotion of Good Forest Practices• Monitoring plan
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	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	<p>The definition of "forests" in Portuguese legislation includes natural forest, plantations, managed forest and as well as non managed forest. Definition of "plantations" is similar to FSC¹, PEFC or SBP systems. The term "conversion" is used in Portuguese forestry legislation when a forest is transformed to a forest plantation.</p> <p>Protection laws focuses much more on particular species, rather than the intensity grade of silvicultural system used. As a result, specific legislation prohibiting conversion of forest (natural or planted) to plantations or other land uses does not exist in the forest legal framework, except in cases of protected sites and species, or after forest fires. For example, conversion from forest land to other uses (below 50ha) or to fast growth plantation (below 350 ha) is legal if it occurs in a contained (discontinuous) area. Above those areas conversion requires an approved Environment Impact Assessment.</p> <p>Conversion from forests to plantations has been even granted with some EU subsidies over the time. Data from last forest inventory ICNF, show a conversion from 1995 to 2010 of 247.000ha of forest use to Plantations, Agriculture, Urban and Shrubs, meaning an annual net decreasing of 16.440 ha (0,7 %/year).</p> <p>A recent report from the forest authority, ICNF, shows that a total of 4304 ha of land with various species was legally converted to eucalyptus plantation between 17/10/2013 and 25/01/2016 (excluding areas below 0.5ha).</p> <p>Concluding, it is clear that two types of conversion are detected in Portugal:</p> <ul style="list-style-type: none"> a) Legal type, which covers the majority of areas, including conversion to fast growth forest plantation or other plantations, agriculture, urbanization and dams. b) Illegal type, where conversion data is more complex and difficult to report. These cases are often reported in the media and NGO communications. <p>Considering the absence of complete legislative requirements regulating the conversion of forests to plantation and the statistics about the area converted after 2008., it is considered a specified risk that feedstock is sourced from forests converted to production plantation forest or non-forest lands after January 2008.</p>

Means of Verification	<p>Historical maps and enquiries with stakeholders</p> <p>Regional, publicly available data from a credible third party</p> <p>Records of BPs' field inspections</p> <p>Monitoring records</p> <p>Aerial photos</p>
Evidence Reviewed	<p>ICNF -Ações de arborização e rearboração. Principais indicadores (outubro de 2013 a janeiro de 2016) Nota informativa n.º 4: http://www.icnf.pt/portal/florestas/arboriz/resource/docs/not-info/RJAAR-nota-informativa-n4-jan2016.pdf</p> <ul style="list-style-type: none"> • ICNF, 2013. IFN6 – Áreas dos usos do solo e das espécies florestais de Portugal continental. Resultados preliminares. [pdf], 34 pp, Instituto da Conservação da Natureza e das Florestas. Lisboa. http://www.icnf.pt/portal/florestas/ifn/resource/ficheiros/ifn/ifn6-res-prelimv1-1 • "Abate de centenas de azinheiras e sobreiros para instalação de olival intensivo", 2006 Quercus - Associação Nacional de Conservação da Natureza at: http://www.quercus.pt/comunicados/2006/outubro/1650-abate-de-centenas-de-azinheiras-e-sobreiros-para-instalacao-de-olival-intensivo • "Obras no terreno continuam após abate ilegal de azinheiras promovido por empresários espanhóis para plantação de olival intensivo" 25/09/2008 Direcção Nacional da Quercus – Associação Nacional de Conservação da Natureza & Núcleo Regional de Beja/Évora http://www.quercus.pt/contactos/341-comunicados/2008/setembro/1222-obras-no-terreno-continuum-apos-abate-ilegal-de-azinheiras-promovido-por-empresarios-espanhois-para-plantacao-de-olival-intensivo • Natural Forest Area change 2010-2015 Map at Global Forest Resources Assessments-FAO - Food and Agriculture Organization of the United Nations at http://www.fao.org/forest-resources-assessment/current-assessment/maps-and-figures/en/ • Forest Change - GIS/Map in Global Forest Watch at: http://www.globalforestwatch.org/map/5/39.60/-8.50/PRT/grayscale/loss,forestgain?begin=2001-01-01&end=2014-12-30&threshold=30 <p>Legislation:</p> <ul style="list-style-type: none"> • Conversion from natural <i>Quercus suber</i> and <i>Quercus rotundifolia</i> to other land uses: DL 169/2001, de 25/05 Artº 2º https://dre.pt/application/dir/pdf1sdip/2001/05/121A00/30533059.pdf updated by DL155/2004, 30/06 https://dre.pt/application/dir/pdf1sdip/2004/06/152A00/39673968.pdf • Conversion inside Protected and Classified areas:

	<p>DL142/2008 at 24/07 Artº 43º</p> <p>https://dre.pt/application/dir/pdf1sdip/2008/07/14200/0459604611.PDF</p> <p>DL 49/05 24/02 https://dre.pt/application/dir/pdf1sdip/2005/02/039A00/16701708.pdf</p> <ul style="list-style-type: none"> • Destruction of natural riparian vegetation: Law 58/2005 29/12; Law 54/2005,at 15/11 (Artº 25º) https://dre.pt/application/dir/pdf1sdip/2005/11/219A00/65206525.pdf • Conversion from natural Ilex aquifolium DL 423/89, 4/12 (Artº 1) https://dre.pt/application/dir/pdf1sdip/1989/12/27800/52915292.pdf • Conversion from natural landscapes and hillside/slope erosion: DL 139/89 28/04 artº1 http://www.icnf.pt/portal/icnf/faqs/arbor/dl139-89 • Conversion by deforestation above 50ha (10ha in Sensitive Areas) or for reforestation with fast growth forest species on areas above 350ha (or 70 ha in sensitive areas) DL 151-B/2013 Artº 1º https://dre.pt/application/dir/pdf1sdip/2013/10/21102/0000600031.pdf
Risk Rating	<p><input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>
Comment or Mitigation Measure	<ul style="list-style-type: none"> • Consultation of historical information sources and information from stakeholders • Analysis of owner's information regarding the past and future area's covering and use. • Procedures to conduct monitoring field audits to verify if feedstock is or is not sourced from forests converted to production plantation forest or non-forest lands after January 2008. • Disqualify material coming from areas where natural forest were converted into Eucalyptus or other plantation from 2008, or to be converted with Eucalyptus or other plantation, or transformed into pasture, agriculture or other non-forest use; • Promotion of Good Forest Practices • Monitoring plan

	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	<p>Most environmental legal requirements relating to forestry planning activities are included in Portugal's forestry legislation. In the administrative process of forest planning or forestation projects, the competent entities are centrally consulted by the national forest authority (ICNF).</p> <p>Management Plans including Forest Intervention Zone (ZIF), Community Use Area Plan (PUB) and Intervention Special Plan (PEIF) have been in place since 2000, and (to 2013) cover about 44% of Portuguese forest area.</p> <p>In private areas, forest plans are mandatory for all forest areas greater than a certain area (from 25ha to 100ha, depending on the region); however lack of this requirement has not resulted in any known penalties.</p> <p>In public areas, forest plans are obligatory for all areas; however numbers from 2012 indicate that only 43% of these forests have the PGF. As of 2015, it is an objective of the forest authority ICNF that 100% of its areas should have a PGF by 2017.</p> <p>In communitarian forests plans are obligatory for all areas however 2015 data show that Forest Plans (PUB) are in place in only 60% of cases.</p> <p>Forest Management Plans should include identification of most part of potential impacts and measures to minimize them. However it is not a specific tool used to monitor environmental impacts.</p> <p>Legal impact assessment and monitoring processes are the activities that need an Environmental Impact Assessments like conversions above 50ha or reforestations with fast growth species above 350ha. These figures are lower when they occur inside Sensitive Areas (Protected, Classified and Monumental Areas), where it is obligatory to have this approved EIA if conversion to non-forest uses involves an area greater than 10 ha or forestation/reforestation is taking place with fast-growing forest species covering over 70 ha.</p> <p>However the described legal framework doesn't include the impact assessments to ordinary clear cuts, neither it was found national legislation or policies about maximum size of clear cuttings. The exceptions are the Regional Forest Plans of some of the Northern regions, where 10 hectares is defined as the maximum clearcuttings area.</p>

	<p>Also some Municipalities may have municipal regulations about clearcutting fellings.</p> <p>So it is considered there are specified risks that feedstock is sourced from forests where there is no appropriate assessment of impacts, when clear cuttings are done over a specific size area.</p> <p>This specific area is defined regionally by each Regional Forest Plan (PROF), as the maximum clearcutting area or the size of even aged monoespecific forest stand.</p> <p>This risk is associated to private and communitarian, and public forest properties not managed by Forest Services (ICNF)..</p>
Means of Verification	<p>Approved EIA when applicable.</p> <p>Approved Forest Management Plan when applicable</p> <p>Records of oil and hazardous chemicals deliveries.</p> <p>Manifest</p> <p>Records of BPs' field inspections</p> <p>Monitoring records</p> <p>Regional Forest Plan</p>
Evidence Reviewed	<p>Government sources</p> <ul style="list-style-type: none"> • Instituto da Conservação da Natureza e Florestas at http://www.icnf.pt/portal • APA-Agência Portuguesa de Ambiente at http://apambiente.pt/index.php • Municipalities at (<a href="http://www.cm-<NAME>.pt/">http://www.cm-<NAME>.pt/) • Alvaizere Municipality forest regulation includes clearcutting fellings: http://ftp.cm-alvaizere.pt/regulamentos/Regulamento_florestal.pdf <p>Non-Government sources</p> <ul style="list-style-type: none"> • Quercus - Associação Nacional de Conservação da Natureza at http://www.quercus.pt/ • LPN-Liga para a Protecção da Natureza at http://www.lpn.pt • GEOTA - Grupo de Estudos de Ordenamento do Território e Ambiente at http://www.geota.pt/scid/geotawebpage • Greenpeace International at http://www.greenpeace.org/international/en/ • World Wildlife Fund -Portugal at: http://www.wwf.pt/ <p>Legislation:</p> <p>National Ecological Reserve</p> <ul style="list-style-type: none"> • DL 239/12 at 2/11 artº20ºnº1 e) <p>EIA</p> <ul style="list-style-type: none"> • DL 151-B/2013 de 31/10 artº 1º nº3 b) Anexo II

	<p>https://dre.pt/application/dir/pdf1sdip/2013/10/21102/0000600031.pdf</p> <p>DLnº 47/2014, 24/03 31/10 DLnº 179/2015, 27/08 artº2º</p> <p>• Environment Law Lei de Bases de Política do Ambiente: Lei n.º 19/14 de 14/04 artº10ºd)</p> <p>DL</p> <p>nº49/05, de 24/02 artº20º • DL 197/2005, de 8/11 artº 1º, nº3 b) e nº4,</p> <p>Machinery</p> <p>• NP 1948, de 1994</p> <p>Forest Equipament Chainsaw:</p> <p>•NP 2761, de 1988</p> <p>• NP EN 13525:2005+A2:2009</p> <p>Forest fire areas:</p> <p>• DL nº55/2007, de 12/03 artº1º</p> <p>•Lei n.º 54/91, de 8/08</p> <p>• DL nº34/99, de 5/02 artº1º</p> <p>• Ministry Council Resolution nº 5/2006, de 18/01</p>
Risk Rating	<p><input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>
Comment or Mitigation Measure	<ul style="list-style-type: none"> • Consultation of information sources and legislation regarding impact assessment. • Analysis of information from the area regarding social and environmental aspects • Procedures for conduct field audits to verify social and environmental aspects and the appropriate assessment, planning and implementation of measures for minimise real or potential impacts, especially in case of clear cuttings made over a specific size area, defined regionally by each Regional Forest Plan (PROF), as the maximum clearcutting area or the size of even aged monoespecific forest stand. • Disqualify material coming from areas where no appropriate assessment of impacts, and planning, implementation and monitoring to minimise them, is confirmed; • Promotion of Good Forest Practices • Monitoring plan

	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	<p>Forest residues removal from the field is regulated in Portugal, so loggers and owners have some legal obligations, related with both fire and phytosanitary policies. These obligations are depending on species, areas, seasons and regions.</p> <p>On the other side it is recognized the problem of nutrient and carbon exportation due to harvesting and residues removal in a significant part of the country which is affected by erosion and desertification problems.</p> <p>Madeira.M , Fabião A., et all (2009) study about long term pine stand suggest that system disturbances associated with stand exploitation (harvesting, log removal, harvest residues removal, microclimate changes) may provoke strong variations on the organic C stock and nutrient availability. Proper site management to avoid organic matter and nutrient losses are crucial to assure system sustainability.</p> <p>Other study Madeira, M. (2015) of 30 years in Portuguese soils concludes that “forest residues could be used in production energy, since the site (soil) presents sufficient resilience to nutrient removal however, it takes long-term studies to support such a generalization”.</p> <p>Magalhães, M., Cameira M.,et all (2011) study on soil effect of biomass removal also confirms nutrient exporting as a problem on soil fertility and productivity.</p> <p>FAO- Land Degradation Index — LDI, developed for mainland Portugal (2000-2010) states that the national territory has 32.6% degraded lands and 60.3% are included in the fair to good condition. Lands and soils that accumulate biomass over time are about 67,8% but static trends were observed in 30,8% of territory and 1,5% have a regression on land quality.</p> <p>Later on, Forest Services used aridity index to produce the susceptible map of desertification, indicating priority areas for EU forest grants for forestation projects.</p> <p>The results of this FAO study, among others, where used to create National Program Against Desertification, which is adopted, among others by Regional Forest Plans, defining forest procedures for spaces for carbon sink and other for energetic use of biomass. The private and public Forest Management Plans should adopt these designations and procedures on their implemented management practices and procedures.</p>

	<p>Process of forest residue treatment is commonly included on Best Practices but also on wood supply contracts, and forest land leasing.</p> <p>Nevertheless it is not known the enforcement of the soil practices and procedures at the ground level, because it was not found any information about monitoring works (see indicator 2.2.1 above).</p> <p>On small size forest properties most part of these actions are simplified or they are not legally required. However it is considered that its small scale also reduces the threats and risks involved with those operations.</p> <p>According to the available information it is considered specified the risks for soil quality of sourcing biomass feedstock on:</p> <ul style="list-style-type: none"> -forest lands located on desertification susceptible area according to Forest Services (ICNF) cartography. and - with size above minimum size required for Forest Management Plan, <p>Other cases are considered low risk for this indicator.</p>
Means of Verification	<p>Best Management Practices;</p> <p>Records of BP's field inspections;</p> <p>Assessment at an operational level of measures designed to minimise impacts on the values identified</p> <p>Level of enforcement</p> <p>Regional, publicly available data from a credible third party</p> <p>Erosion and desertification programs and maps</p>
Evidence Reviewed	<p>National System for Forest Fire Prevention:</p> <p>Harvesting temperate forests reduces soil carbon http://ec.europa.eu/environment/integration/research/newsalert/pdf/23si6_en.pdf</p> <p>Susceptible areas to desertification map: http://www.icnf.pt/portal/naturaclas/ei/unccd-PT/pancd/o-pancd-2014-2020/pdr-2020-areas-susceptiveis-e-nao-susceptiveis-a-desertificacao</p> <p>ICNF http://www.icnf.pt/portal/florestas/dpci/relat/raa/resource/ficheiros/ree2012/rel-recup-inc-catraia-set-v5</p>

	<p>PANCD https://dre.pt/application/file/65985917</p> <p>Reserva Ecológica Nacional https://dre.pt/application/dir/pdf1sdip/2012/11/21200/0630806346.pdf</p> <p>Kirkby, M.J., Jones, R.J.A., et all (2004). Pan-European Soil Erosion Risk Assessment: The PESERA Map, Version 1 October 2003. Explanation of Special Publication Ispra 2004 No.73 (S.P.I.04.73). European Soil Bureau Research Report No.16, EUR 21176, 18pp. and 1 map in ISO B1 format. Office for Official Publications of the European Communities, Luxembourg. European Soil Portal, 2013, http://eusoils.jrc.ec.europa.eu/ESDB_Archive/eusoils_docs/esb_rr/n16_ThePeseraMapBkLet52.pdf</p> <p>Good Forest Practices http://www.icnf.pt/portal/florestas/gf/documentos-tecnicos/resource/doc/Boas-Praticas-Florestais.pdf</p> <p>LEAF: Epic WebGis Portugal: http://epic-webgis-portugal.isa.ulisboa.pt/maps/epic?format=image/png;%20mode=8bit&startExtent=-1523000,4400000,-143668,5180000</p> <p>Pinus Nematode:</p> <ul style="list-style-type: none"> •Dec.Retificação n.º 38/2015 de 01/09 •DL 123/15, at 3/07 •DL 95/2011, de 8/08 •DL 154/05 6/09 •Dec. n. 30-A/2011, de 7/10 <p>Madeira.M , Fabião A., Páscoa F., Magalhães M., Cameira,M , Ribeiro C. (2009) Carbon and nutrient amounts in aboveground biomass, understory and soil in a pine stand chronosequence, http://www.scielo.mec.pt/pdf/rca/v32n2/v32n2a15.pdf</p> <p>Madeira, M. (2015) Thirty years of research on soil quality in forest systems under Mediterranean conditions. Trends and future. http://www.repository.utl.pt/bitstream/10400.5/9277/1/REP-M.Madeira-Spanish%20j.S.C..pdf</p> <p>Magalhães, M., Cameira M., Pato, Santos R. & Bandeira, J (2011) Residual forest biomass: effects of removal on soil quality http://www.scielo.mec.pt/scielo.php?script=sci_arttext&pid=S0871-018X2011000200019</p>
Risk Rating	<div> <input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA </div>

<p>Comment or Mitigation Measure</p>	<ul style="list-style-type: none"> • Consultation of information sources and legislation related with soil aspects • Analysis of information from the area regarding soil erosion. • Procedures for conduct field audits to verify if forest management maintains or improves soil quality, especially in forest lands located on desertification susceptible area according to Forest Services (ICNF) cartography and with size above minimum size required for Forest Management Plan in respective PROF. • Disqualify material coming from areas where is confirmed that forest management do not maintains or improves soil quality. • Promotion of Good Forest Practices • Monitoring plan
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	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	<p>For better understanding of key ecosystems and habitats identification see indicator 2.1.1, and for its conservation see indicator 2.1.2.</p> <p>In Portugal key ecosystems and habitats are to be found mostly in Protected areas and in Classified Areas (Natura 2000). The overlap of classified areas over protected areas is approximately 1/3 of the total, which means that approximately 2/3 of classified areas are not included in protected areas of the National Network of Protected Areas.</p> <p>Also there are key ecosystems and habitats occurring outside Protected and Classified areas.</p> <p>It is considered that this indicator is covered and detailed by indicator 2.1.2, for which low risk was not reached in this risk assessment. Same mitigation measures must be carried out to minimize the specified risks found.</p>
Means of Verification	<p>Best Management Practices</p> <p>Supply contracts</p> <p>Assessment of potential impacts at operational level and of measures to minimise impacts</p> <p>Monitoring results</p> <p>Publicly available information on the protection of the identified values</p> <p>Regional, publicly available data from a credible third party</p>
Evidence Reviewed	See evidences reviewed listed at indicators 2.1.1 and 2.1.2, above.
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	<ul style="list-style-type: none"> • Consultation of information sources regarding biodiversity • Analysis of information from the area regarding biodiversity. • Procedures for conduct specific field audits to identify and address real and potential threats to conservation of key ecosystems and habitats. • Disqualify material coming from areas where forest management and operations represent evident threats to conservation of key ecosystems and habitats. • Promotion of Good Forest Practices • Monitoring plan

	Indicator
2.2.4	The Biomass Producer has implemented appropriate control systems and procedures to ensure that biodiversity is protected (CPET S5b).
Finding	<p>For better understanding of biodiversity identification see indicator 2.1.1, and for its conservation see indicator 2.1.2.</p> <p>Biodiversity is included in fundamental environmental law in its article 10th (Law 19/2014 14/04) and is fully covered by biodiversity and nature conservation legal framework.</p> <p>In Continental Portugal the protected areas and Natura 2000 sites covers 2.017.803 ha meaning 20.47% of the territory.</p> <p>As on Convention on Biological Diversity: <i>“Portugal’s National Biodiversity Strategic Action Plan NBSAP was based on the following ten guiding principles: an overall higher level of protection; the sustainable use of biological resources; prevention; precaution; recuperation; responsibility; integration; participation; international cooperation and decentralization. The NBSAP then lists 10 fundamental strategies that form the basis of their action plan, which include: to promote scientific research and knowledge of local patrimony; to enhance the National Protected Areas Network; to promote the valorisation of the protected areas, and ensure the conservation of all social, cultural and natural components; ensure conservation and valorisation of areas within the Natura 2000 Network; implement, across the entire national territory, actions specific to the conservation and management of species and habitats of particular interest; integrate conservation and sustainable use principles into national and regional policies and laws; reinforce cooperation between all levels of administration; promote education and formation in conservation fields; ensure public education, awareness and sensitization; and strengthen international cooperation.”</i></p> <p><i>(...) About 3,600 species of plants occur in Portugal. There are 69 taxa of terrestrial mammals, a total of 313 bird species, of which around 35% are threatened in some ways, and 17 amphibian and 34 reptile species that occur in Portugal. Some of the main threats to the biological diversity of Portugal include: alteration or destruction of habitats; pollution; overexploitation; invasive alien species; urbanization and fires.</i></p> <p>It is considered that a significant part of biodiversity is covered and detailed by indicators 2.1.1 and 2.1.2, for which low risk was not reached in this risk assessment.</p> <p>All classified habitats, besides priority ones included on HCV, must be included in this indicator.</p>

	Same mitigation measures must be carried out to minimize the specified risks found.
Means of Verification	<p>Best Management Practices</p> <p>Supply contracts</p> <p>Assessment of potential impacts at operational level and of measures to minimise impacts</p> <p>Monitoring results</p> <p>Publicly available information on the protection of the identified values</p> <p>Regional, publicly available data from a credible third party</p>
Evidence Reviewed	<p>Fundamental Environmental Law n.º 19/2014 of 14/04 : http://www.icnf.pt/portal/icnf/legisl/legislacao/2014/lei-n-o-19-2014-de-14-de-abril-d-r-n-o-73-serie-i</p> <p>Dec -Law.nº 142/2008, of 24/07 https://dre.pt/application/file/70698029</p> <p>Convention on biological diversity: https://www.cbd.int/countries/profile/default.shtml?country=pt#nbsap</p> <p>(see also evidence reviewed at indicators 2.1.1 and 2.1.2)</p>
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	<ul style="list-style-type: none"> • Consultation of information sources regarding biodiversity. • Analysis of information from the area regarding biodiversity. • Procedures for conduct specific field audits to identify and address real and potential threats to protection of biodiversity. • Disqualify material coming from areas where is confirmed that forest management and operations do not ensure that biodiversity is protected. • Promotion of Good Forest Practices • Monitoring plan

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	<p>For soil matters related with residue removal see indicator 2.2.2.</p> <p>In Portugal forest residues removal from forests is regulated so loggers and owners have some legal obligations, related with both fire and phytosanitary policies. These obligations are depending on species, areas, seasons and regions.</p> <p>Depending on silvicultural procedures and forest models, the solutions adopted about forest residues are a) integrating them on soil; b) remove them or c) burn them in appropriated season. All of these operations include advantages and disadvantages according to the focus of the overview.</p> <p>In case of removal, it is always considered the harm to the remaining forest, soil, fauna and flora.</p> <p>Process of forest residue removal is commonly included in Best Practices but also in wood supply contracts, and forest land leasing.</p> <p>Based on the available information this indicator is considered low risk</p>
Means of Verification	<p>Best Management Practices;</p> <p>Records of BP's field inspections;</p> <p>Assessment at an operational level of measures designed to minimise impacts on the values identified</p> <p>Level of enforcement of legal framework</p>
Evidence Reviewed	<p>National System for Forest Fire Prevention: https://dre.pt/application/dir/pdf1sdip/2006/06/123A00/45864599.pdf</p> <p>Good Forest Practices http://www.icnf.pt/portal/florestas/gf/documentos-tecnicos/resource/doc/Boas-Praticas-Florestais.pdf</p> <p>Pinus Wilt Disease:</p> <ul style="list-style-type: none"> •Dec.Retif. n.º 38/2015 de 01/09 •DL 123/15, at 3/07 •DL 95/2011, de 8/08 •DL 154/05 6/09 •Dec. n. 30-A/2011, de 7/10 <p>See also evidences listed on 2.2.2</p>

Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	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	<p>Water legal framework includes water law and national and hydrographical basin plans, being Portuguese Environment Agency the national authority.</p> <p>Other police authorities like SEPNA (National Republican Guard) and Nature Guards and Vigilantes, also have competencies of water resources inspection actions.</p> <p>Generally forest resources have a positive impact on water resources, compared with other land use. Forest management must comply with different regulations, in which REN – National Ecological Reservation is the principal regulation for water and soil questions.</p> <p>National Ecological Reservation is a territory classification of sensitive areas for “ecosystem services” where water issues are addressed, and some restrictions are in place to prevent negative impacts in slopes, valleys and other sensible situations. Every forest projects and plans must comply with this regulation, and they are in place, for example in the soil preparation techniques.</p> <p>Major impacts of Portuguese forest on surface water and water downstream are due to forest fires and conversion as seen at 2.1.2 and 2.1.3 indicators above.</p> <p>Other impacts and effects of forest management on water were considered at:</p> <ul style="list-style-type: none"> - Clearcuttings methods above a certain size; - Erosion and desertification problems. <p>So, it is considered a specified risk for water impacts the exploitation by clear cutting at dimensions above to the maximum area indicated for each region by PROF Regional Forestry Management Plan. This risk is applied to all private, communitarian, and public forest areas which are not managed by ICNF.</p> <p>All the other situations are considered low risk according to the available information.</p>
Means of Verification	<p>Internet research</p> <p>GIS maps of HCV areas</p> <p>Regional, publicly available data from a credible third party as FSC and PEFC reports</p> <p>Forest Management plan as PGF, PUB, PEIF</p> <p>Game management plans</p> <p>Regional Forest Plans</p>

	<p>Forest Best Management Practices</p> <p>Forest Operating Procedures</p> <p>Records of BPs' field inspections</p> <p>Monitoring records</p> <p>Publicly available information on the protection of the values identified</p> <p>Historical maps and enquiries with stakeholders</p> <p>Aerial photos</p> <p>Approved EIA when applicable.</p> <p>Records of oil and hazardous chemicals deliveries.</p> <p>Assessment at an operational level of measures designed to minimise impacts on the values identified</p> <p>Erosion and desertification programs and maps</p>
Evidence Reviewed	<p>Water Law:</p> <p>Dec-Law n.º 130/2012 22/06</p> <p>https://dre.pt/application/dir/pdf1sdip/2012/06/12000/0310903139.pdf</p> <p>National Water Plan:</p> <p>http://www.apambiente.pt/?ref=16&subref=7&sub2ref=9&sub3ref=833</p> <p>Hydrographical basin Plans</p> <p>http://www.apambiente.pt/?ref=16&subref=7&sub2ref=9&sub3ref=834#pgbh-tabela</p> <p>Reserva Ecológica Nacional Law:</p> <p>https://dre.pt/application/dir/pdf1sdip/2012/11/21200/0630806346.pdf</p> <p>See also evidences listed on indicators 2.1.1, 2.1.2, 2.1.3, 2.2.1 and 2.2.2</p>
Risk Rating	<p><input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>
Comment or Mitigation Measure	<ul style="list-style-type: none"> • Consultation of information sources and legislation related with water. • Analysis of information from the area regarding soil erosion. • Procedures for conduct field audits to verify if forest management maintains or improves soil quality, especially in case of clear cuttings at dimensions above to the maximum area indicated for each region by PROF (Regional Forestry Management Plan), in areas which are not managed by ICNF. • Disqualify material coming from areas where is confirmed that forest management do not minimise negative impacts on ground water, surface water and water downstream. • Promotion of Good Forest Practices • Monitoring plan

	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	<p>Air legal framework includes air law and national air quality plan, being Portuguese Environment Agency the national authority.</p> <p>Other police authorities like SEPNA (National Republican Guard) and Nature Guards and Vigilantes, also have competencies of air pollution inspection actions.</p> <p>Generally, forests are considered the best use of soil compared with other land use possibilities and forest management activities are not known in the country as to cause air pollution.</p> <p>Major negative impacts from forests are due to forest fires which are not considered management activities.</p> <p>Burning forest residues at the forest site as the traditional way is prevented with forest feedstock sourcing for biomass.</p> <p>Forest equipment must comply with EU directives on air pollution.</p> <p>Based on available information the requirements included in this indicator are considered low risk.</p>
Means of Verification	<p>Forest Best Management Practices</p> <p>Supply contracts</p> <p>Records of BPs' field inspections</p> <p>Assessment at an operational level of measures designed to minimise impacts on the values identified</p> <p>Publicly available information on the protection of air quality as APA website.</p> <p>Regional, publicly available data from a credible third party</p> <p>The existence of a strong legal framework in the region</p>
Evidence Reviewed	<p>• Environmental Laws :</p> <p>Law n.º 19/14 de 14/04 artº10ºd) DL nº49/05, de 24/02 artº20º • DL 197/2005, de 8/11 artº 1º, nº3 b) e nº4,</p> <p>Decree-Law n.º 102/2010 of 23/09</p> <p>https://dre.pt/application/dir/pdf1sdip/2010/09/18600/0417704205.pdf</p> <p>Machinery</p> <p>• NP 1948, de 1994</p>

	<ul style="list-style-type: none"> • NP 2761, de 1988 • NP EN 13525:2005+A2:2009
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	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	<p>The legal framework for agrochemicals use is based on a recent law which applies to Portuguese context the EU Directive n.º 2009/128/CE, of 21/10.</p> <p>Fertilisers are prescribed on some forest management systems like installation period or forest plantations, but the intensity of this use is very low according to every perspective.</p> <p>The implementation of this law had a very positive impact on use of agrochemicals, and included the need of accredited training, and records (quantities, disposals, etc) to all the involved people.</p> <p>The use of chemicals on Portuguese forests is not common and it is very restricted in few cases because, among others, there are few homologate products applying to the most important phytosanitary forest plagues and diseases.</p> <p>In this exceptional cases are pine processionary (<i>Thaumetopoea pityocampa</i>) and the eucalyptus snout beetle (<i>Gonipterus platensis</i>), but in both cases there are also other - biologic and genetic measures.</p> <p>Based on available information the requirements included in this indicator are considered low risk.</p>
Means of Verification	<p>Existing legislation;</p> <p>Level of enforcement;</p> <p>Assessment at an operational level of measures designed to minimize impacts on the values identified;</p> <p>Monitoring records;</p> <p>Interviews with staff.</p> <p>Records of chemicals deliveries</p>
Evidence Reviewed	<p>Law n.º 26/2013 de 11 /04: https://dre.pt/application/file/260367</p> <p>Pine processionary official Plan: http://www.icnf.pt/portal/florestas/prag-doe/resource/doc/proc/proc-florest-2015.pdf</p> <p>Eucalyptus snout beetle official plan: http://www.icnf.pt/portal/florestas/prag-doe/ag-bn/gorg-eucal</p>

Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	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	<p>The legal framework for waste disposal is based on a recent law which applies to Portuguese context the EU Directive n.º 2008/98/CE.</p> <p>Portuguese Environment Agency is the national authority but other police authorities like SEPNA (National Republican Guard) and Nature Guards and Vigilantes, also have competencies in waste disposal. Also municipal authorities can apply municipal rules to implement applicable legislation.</p> <p>Waste disposal on forest lands exists in Portugal and it affects both private and public lands. But as it is illegal in the country there are efforts made by private owners and authorities to collect the waste and send it to final legal destination.</p> <p>Some of the measures used by owners include fencing of their lands, sign installation against waste disposal and formalizing complaints to authorities in case of illegal waste disposal.</p> <p>Based on available information the requirements included in this indicator are considered low risk</p>
Means of Verification	<p>Existing legislation;</p> <p>Level of enforcement;</p> <p>Regional Best Management Practices</p>
Evidence Reviewed	<p>Waste Management and Planning Official page: https://www.apambiente.pt/index.php?ref=16&subref=84</p> <p>Decree-Law n.º 73/2011 de 17/06: https://www.apambiente.pt/_zdata/Politicar/Residuos/DL_73_2011_DQR.pdf</p> <p>Waste National Management Plan: file:///C:/Users/imobi_000/Downloads/Projeto_PNGR_2011-2020.pdf</p> <p>European Waste Statistical: http://ec.europa.eu/eurostat/statistics-explained/index.php/Waste_statistics/pt</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	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.
Finding	<p>Statistical information on National Forest Inventory is fully available from IFN5 (2005) and preliminary results from IFN6 (2010).</p> <p>Preliminary results from IFN6 (2010) for main species in pellet production show that:</p> <ul style="list-style-type: none"> • Total forest area in Mainland Portugal is 3,154,800 ha of which 2,972,356 ha correspond to the forested area. • <i>Eucalyptus</i> plantations are larger Portuguese forests. Forest cover with <i>Eucalyptus</i> has increased of 13% from 1995 to 2010 (over 90,000 ha in the period to a total surface of 812,000 ha in 2010; 755,355 ha on forested areas) mostly on areas converted from <i>Pinus pinaster</i> (70,000 ha in the period). <i>Pinus</i> Wilt Disease/Nemátodo-do-pinheiro pest, fires and economic motivations can be behind it. • <i>Pinus pinaster</i> forests have decreased significantly from 1995 to 2010: of 27% on total surface (263,000 ha in the period to a total surface of 713,000 ha in 2010; 624,248 ha on forested areas). 163,000 ha was converted to open land, mostly related to <i>Pinus</i> Wilt Disease/Nemátodo-do-pinheiro pest and fires and 70,000 ha to <i>Eucalyptus</i> plantations, which can also include economic motivations. Represents the majority of inputs in BP feedstock. • <i>Pinus pinea</i> forests have increased significantly from 1995 and 2010: 54% (over 55,000 ha in the period to a total surface of 175,000 ha in 2010; 173,716 ha on forested areas). This species is planted primarily for harvesting of pine nuts and protective land use. Has impact on feedstock in southern pellet plants. It is not subject to harvest for round wood production so feedstock comes as a result of silvicultural works. This species has good biomass percentage in relation to its volume as a result of branches. <p>Analysing statistical information available for average annual growth (AMA) from IFN5 (2005) show for Mainland Portugal:</p> <ul style="list-style-type: none"> ▪ On <i>Eucalyptus</i> an average annual growth of 4,375,000 m³/year based on 2005 inventory data. Currently the value will be significantly higher. <i>Eucalyptus</i> wood from Portugal consumption in 2014 was 5,400,000 m³ (CELPA data). <i>Eucalyptus</i> is fast growing species, over 12 years, with one and only cut on the period: final clear cut. So harvesting does not compromise long-term production of the forest.

	<ul style="list-style-type: none"> On <i>Pinus pinaster</i> an average annual growth of 3,650,000 m³/year based on 2005 inventory data. Currently the value will be lower. <i>Pinus pinaster</i> wood from Portugal harvested in 2014 was 2,247,000 m³ (Centro Pinus data). So <i>Pinus pinaster</i> wood available from Portugal in under AMA. <p>On the analysis it is relevant also to take into account that:</p> <ol style="list-style-type: none"> 1. Pinus Wilt Disease/Nemátodo-da-madeira-do-pinheiro pest have affected significantly to <i>Pinus pinaster</i>. 2. Fires continue to be a relevant problem in Portugal. 3. Data from CentroPinus states that pine wood consumption of timber industry in 2014 was 4,360,000 m³, with a relevant data a 1,400,000 m³ for pellets, 32% of total. Also 32% of pine wood used by CentroPinus partners was imported in 2014. Percentage of imported pine wood used in 2006 was 3%. So lack of pine wood from Portugal is being covered with importations, mainly from Spain. 4. Data from CELPA states that Eucalyptus consumption of pulp and paper industry in 2014 was 7,800,000 m³ (4,980,000 m³ in 2005), of which 2,415,000 m³ were imported, mainly from Spain. <p>So all above information shows that actual harvesting volume does not exceed sustainable values and compromises long-term economic viability of stands. Thus the risk for this indicator has been assessed as Low.</p>
Means of Verification	Volume and growth data and yield calculations, and Operational Practice indicate that biomass feedstock harvesting rates avoid significant negative impacts on forest productivity and long-term economic viability.
Evidence Reviewed	<p>Estrategia Nacional das Florestas (RCM n.º 6-B/2015 - Diário da República n.º 24/2015, 1º Suplemento, Série I de 2015-02-04); ICNF portal (http://www.icnf.pt/portal/icnf/docref/enf)</p> <p>Estatísticas Agrícolas 2015.xls, Instituto Nacional Estatística (https://www.ine.pt/xportal/xmain?xpid=INE&xpgid=ine_publicacoes&PUBLICACOESpub_bo ui=271434407&PUBLICACOESmodo=2)</p> <p>Inventario Florestal Nacional IFN5 (FloreStat_IFN5); ICNF portal (http://www.icnf.pt/portal/florestas/ifn/ifn5/rel-fin)</p> <p>Inventario Florestal Nacional IFN6, preliminary results (IFN6 - Resultados preliminares.pdf); ICNF portal (http://www.icnf.pt/portal/florestas/ifn/ifn6)</p> <p>Boletim-Estatístico-da-Celpa-de-2014 (http://www.celpa.pt/wp-content/uploads/2016/09/Boletim_WEB_2015.pdf)</p> <p>Relatório-de-Characterização-da-Fileira-Florestal-2014 (http://www.aiff.org.pt/assets/Relatorio-de-Characterizacao-da-Fileira-Florestal-2014-160p-CAPA-3-spread....pdf)</p> <p>Fileira do Pinho: desafios e oportunidades (centroPINUS_JoaoGonçalves dados fileira pinho</p>

	<p>2014.pdf); Centro Pinus (http://www.centropinus.org/index.php?lingua=1)</p> <p>Decreto lei 16-2009 planos gestão florestal</p> <p>(https://dre.pt/application/dir/pdf1sdip/2009/01/00900/0026800273.pdf); ICNF portal</p> <p>(http://www.icnf.pt/portal/icnf/legisl/legislacao/2009/decreto-lei-n.o-16-2009-de-14-de-janeiro.-d.r.-n.o-9-serie-i)</p> <p>Normas Tecnicas Planos Gestão Florestal, ICNF portal</p> <p>(http://www.icnf.pt/portal/florestas/gf/pgf/resource/doc/manual/normas-tecn-PGF-AFN.pdf)</p>
Risk Rating	<p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>
Comment or Mitigation Measure	

	Indicator
2.3.2	Adequate training is provided for all personnel, including employees and contractors (CPET S6d).
Finding	<p>National Strategy of Forests states that focus on the professionalization and training of the different actors in the forestry sector will be of key importance for increasing the competitiveness and development of the sector. The discussion of this aspect with the partners for the establishment of a training program will be one of the pillars for the development of knowledge and skills.</p> <p>ICNF, governmental institution develops trainings related to forest since training of forest operators to more technical issues regarding inspectors, forest managers, foresters,.. Operations Center and Forest Techniques (COTF) is a center for forestry professional training under the direct management of the ICNF and has as main objective the training and professional enhancement, with special emphasis with regard to forestry operations, use and maintenance of machinery and equipment, and the methods and techniques used, always giving due and necessary attention compliance with the safety, hygiene and health at work. It is operative since 1984 and every year provides training to forest enterprises, ICNF staff, inspectors and divulgation activities (schools and others).</p> <p>Relevant in training at the forest level are also the Organizations of Forest Producers (OPF) mainly from Municipalities from North and Center Portugal and also many courses by private entities over the country.</p> <p>Portugal is a country with an old tradition in forests activities. University education is provided on the technical side with several colleges in the country. There are specific courses for field machinery operators but it is planned to be updated on the National Catalog of Formations a new training on Forestry Machinery Technician not yet available.</p> <p>Under this information taking into account strong forest tradition in the country and the presence of access to adequate levels of training the risk on the indicator is assessed as low.</p>
Means of Verification	<p>Existing legislation</p> <p>Level of enforcement</p> <p>Training course curricula</p> <p>Records of BPs' field inspections</p> <p>Training records</p> <p>Interviews with staff</p> <p>Training plans, training records, and records of qualifications</p>
Evidence Reviewed	Estrategia Nacional das Florestas (RCM n.º 6-B/2015 - Diário da República n.º 24/2015, 1º Suplemento, Série I de 2015-02-04); ICNF portal (http://www.icnf.pt/portal/icnf/docref/enf)

	<p>Centro de Operações e Técnicas Florestais (COTF) - Segurança e Saúde, ICNF portal http://www.icnf.pt/portal/florestas/gf/cotf; http://www.icnf.pt/portal/florestas/gf/cotf/o-q-e; http://www.icnf.pt/portal/florestas/gf/cotf/formacao</p> <p>Catalogo Nacional de Formações http://www.catalogo.anqep.gov.pt/PDF/QualificacaoReferencialPDF/1065/CA/duplacertificacao/623314_RefCA http://www.catalogo.anqep.gov.pt/boDocumentos/getDocumentos/522</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.3.3	Analysis shows that feedstock harvesting and biomass production positively contribute to the local economy, including employment.
Finding	<p>Statistic shown that value added of forest production in Portugal is 1,193million euro (M€) in 2014, with a sustained growth over last years. Also 2014 forestry goods production have an estimation of 878.25 M€ of which wood for energy is 55.38 M€ (6%).</p> <p>Data from INE 2012 states that 91% of Portuguese forest sector enterprises have from 1 to 10 workers. Forest industries employ 78,000 people (12% of all Portuguese processing industry, 1.7% of Portuguese employed population) of which 10,600 work on logging companies and 20,800 on wood industry. Also annual turnover of forest sector industries was in 2012 over 7,392 M€(2,497.6 M€ wood and furniture industry, 1,320.4 M€ cork industry and 3,574.6 M€ pulp and paper industry), representing 10% of all Portuguese processing industry. Despite the recent crisis, the forest sector has maintained its contribution, in macroeconomic terms, in terms of added value.</p> <p>Biomass/Feedstock with origin in Portuguese forest is supplied through domestic supply chains to BP's so economic impact related to feedstock chain from the forest, transportation, processing and BP is local. Also it is mainly complementary with other wood industries as use on their processes low quality wood (which previously it was not exploited or it was burned) or wastes from industrial processes.</p> <p>With all of these considerations we can conclude that biomass production contributes positively to local economy and thus the indicator has been assessed as low.</p>
Means of Verification	Data analysis
Evidence Reviewed	<p>Estrategia Nacional das Florestas (RCM n.º 6-B/2015 - Diário da República n.º 24/2015, 1º Suplemento, Série I de 2015-02-04); ICNF portal (http://www.icnf.pt/portal/icnf/docref/enf)</p> <p>Estatísticas Agrícolas 2015.xls, Instituto Nacional Estatística (https://www.ine.pt/xportal/xmain?xpid=INE&xpgid=ine_publicacoes&PUBLICACOESpub_bo ui=271434407&PUBLICACOESmodo=2)</p> <p>Relatório-de-Characterização-da-Fileira-Florestal-2014 (http://www.aiff.org.pt/assets/Relatorio-de-Characterizacao-da-Fileira-Florestal-2014-160p-CAPA-3-spread....pdf)</p> <p>Fileira do Pinho: desafios e oportunidades (centroPINUS_JoaoGonçalves dados fileira pinho 2014.pdf); Centro Pinus (http://www.centropinus.org/index.php?lingua=1)</p>

Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	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	<p>For a long time have been identified some health problems in the forest in Portugal, some of them associated with perturbations occurring in forest ecosystems caused by various biotic and abiotic factors and others associated with the type of forest management which has been implemented as it is stated in the National Forest Strategy (2015). Health and vitality of Portuguese forest ecosystem have become a serious problem especially because of pests and diseases.</p> <p>Statistics from IFN5 (last complete inventory data available) shows that percentage of heavy damaged trees have increased from 1995 to 2005:</p> <ul style="list-style-type: none"> • Pinus pinaster. From 7% of trees with heavy damage in 1995 to 11% in 2005. • Pinus pinea. From 2% to 7%. • Eucalyptus. From 4% to 11% <p>Lists of pests and diseases that actually affect significantly to Portuguese forests are: Cork Oak “Montados” decline, Pinus Wilt Disease/nemátodo da madeira do pinheiro (NMP) in <i>Pinus pinaster</i>, gorgulho do eucalipto (<i>Gonipterus platensis</i>) in <i>Eucalyptus</i>, o sugador das pinhas (<i>Leptoglossus occidentalis</i>) in <i>Pinus pinea</i>, cancro resinoso do pinheiro (<i>Fusarium circinatum</i>) in Pinus and other coniferous,...</p> <p>From 2005 NMP pest and others have affected strongly to Portuguese forests so actual values will be higher than this.</p> <p>In order to face the situation Portuguese Government has approved the Operational Program of Forest Health which applies solely to Mainland Portugal and has a generic diagnosis of the current situation in terms of phytosanitary protection, defining the entities with responsibilities in the implementation of measures and actions to prevent and control.</p> <p>Four National Action/Control Plans were developed for each one of the most relevant pests: Pinus Wilt Disease/nemátodo da madeira do pinheiro (NMP) in <i>Pinus pinaster</i>, gorgulho do eucalipto (<i>Gonipterus platensis</i>) in <i>Eucalyptus</i>, o sugador das pinhas (<i>Leptoglossus occidentalis</i>) in <i>Pinus pinea</i>, cancro resinoso do pinheiro (<i>Fusarium circinatum</i>) in Pinus and other coniferous.</p> <p>In affection to health and vitality of forests there are also mentioned:</p> <ul style="list-style-type: none"> • Abandonment of management

	<ul style="list-style-type: none"> • Continuous monocultures of one species (especially Eucalyptus plantations) • Invasive species. As an example it is stated that from last inventory records (IFN6) the area of Acacia has duplicated from 1995 to 2010 • Fires. The increase of forest fires in comparison with the previous decades represents the actual greatest perceived risks in the Portuguese forest sector. <p>Availed in the next indicator</p> <p>These biotic and abiotic risks are supported by disturbances affect in 2011 24% of the forest area, generated by a regressive vicious cycle that combines fire, “seca”, pests, diseases and invasive species.</p> <p>Thus while it seems clear that Portuguese government has taken steps to address the problem, with actual information available this indicator needs to be assessed as specified risk for health and vitality of forests ecosystems.</p>
Means of Verification	<p>Overall evaluation of potential impacts of operations on forest ecosystem health and vitality</p> <p>Assessment of potential impacts at operational level and of measures to minimise impacts</p> <p>Regional Best Management Practices</p> <p>Supply contracts</p> <p>Monitoring results.</p> <p>Experts consultation</p>
Evidence Reviewed	<p>Estrategia Nacional das Florestas (RCM n.º 6-B/2015 - Diário da República n.º 24/2015, 1º Suplemento, Série I de 2015-02-04); ICNF portal (http://www.icnf.pt/portal/icnf/docref/enf)</p> <p>UNECE, Forest Europe report 2011 (https://www.unece.org/fileadmin/DAM/publications/timber/Forest_Europe_report_2011_web.pdf)</p> <p>Programa Operacional de Sanidade Florestal, ICNF portal (http://www.icnf.pt/portal/florestas/prag-doe/posf)</p> <p>Fitossanidade florestal. Divulgação e informação, ICNF portal (http://www.icnf.pt/portal/florestas/prag-doe/divulg)</p> <p>Programas de Monitorização e Controlo de Pragas e Doenças, ICNF portal (http://www.icnf.pt/portal/florestas/prag-doe/resource/img/apr-progr-monit-c-pragas-e-d/view)</p> <p>Medias Controlo Nemátodo-da-Madeira-do-Pinheiro_03_2015, ICNF portal (http://www.icnf.pt/portal/florestas/prag-doe/resource/doc/divul/apresentacoes/2015-03-12/NMP_03_2015.pdf)</p> <p>Inventario Florestal Nacional IFN5 (FloreStat_IFN5); ICNF portal (http://www.icnf.pt/portal/florestas/ifn/ifn5/rel-fin)</p> <p>Inventario Florestal Nacional IFN6, preliminary results (IFN6 - Resultados preliminares.pdf); ICNF portal (http://www.icnf.pt/portal/florestas/ifn/ifn6)</p> <p>Relatório-de-Characterização-da-Fileira-Florestal-2014 (http://www.aiff.org.pt/assets/Relatorio-</p>

	de-Characterizacao-da-Fileira-Florestal-2014-160p-CAPA-3-spread....pdf Quercus NGO Manifesto da Quercus pelas florestas (http://www.quercus.pt/documentos-floresta/2955-manifesto-da-quercus-pela-florestas)
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	<ul style="list-style-type: none"> • Consultation of information sources regarding biotic and abiotic risks for the ecosystems services. • Analysis of information from the area regarding biotic and abiotic risks. • Procedures to access information from the area regarding biotic and abiotic risks, and procedures for conduct monitoring field audits to verify ecosystems services, social and environmental aspects and the appropriate assessment, planning and implementation of measures for minimise real or potential risks and impacts. • Disqualify material coming from areas where health, vitality and other services provided by forest ecosystems are not maintained or improved; • Promotion of Good Forest Practices • Monitoring plan

	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	<p>Pests, diseases and fires are today the greatest perceived risks in the Portuguese forest sector.</p> <p>As stated in previous indicator biotic and abiotic risks are supported by disturbances affect in 2011 24% of the forest area, generated by a regressive vicious cycle that combines fire, "seca", pests, diseases and invasive species.</p> <p><u>Regarding pests and diseases</u> although affection is serious (see indicator 2.4.1) Portuguese Government has approved the Operational Program of Forest Health which has a diagnosis of the current situation in terms of phytosanitary protection, defining the entities with responsibilities in the implementation of measures and actions to prevent and control.</p> <p>Four National Action/Control Plans were developed for each one of most relevant pests: Pinus Wilt Disease/nemátodo da madeira do pinheiro (NMP) in <i>Pinus pinaster</i>, gorgulho do eucalipto (<i>Gonipterus platensis</i>) in <i>Eucalyptus</i>, o sugador das pinhas (<i>Leptoglossus occidentalis</i>) in <i>Pinus pinea</i>, cancro resinoso do pinheiro (<i>Fusarium circinatum</i>) in Pinus and other coniferous.</p> <p>In the case of NMP extensive legislation and information is available. There are enforcement and monitoring on the performance of the several actors: loggers, transporters, warehouses, industrial facilities. Every step need of official document.</p> <p>Therefore vigorous measures have been taken to address the problems and regarding pest and diseases risk is assessed as low.</p> <p><u>Regarding fires</u> in the UNECE report (2011) Portugal figure as the European country with the highest percentage of forest area burned 3% / year. The impacts of fires are indisputable considering Forestry Authority "Forest fires are one of the risk factors in the preservation and conservation of nature and biodiversity, an important element conditioning the evolution of habitats and natural vegetation" ICNF 2014.</p> <p>A comprehensive analysis for the period 2003-2013 the analysis reveals high concern figures: total burned area of 1,573,940 ha, in which about 51% are forest stands (800,470 ha), an average of 22,777 events / year, of which 95.1% are associated with human action (negligence or intentional).</p> <p>The national program for forest fire protection (PNDFCI) establishes various levels (national, regional, municipal and local) in order to create a network of forest fire prevention (primary and secondary on public level and tertiary on forest owner level).</p> <p>This system aims to compartmentalize extensive woodlands and contribute to the</p>

	<p>containment and firefighting. The identification of these elements is defined in the various plans in force particularly in the Forestry Management Regional Plans (PROF) and Forest Defense Municipal Plans Against Fires (PMDFCI), which also define the responsibilities for its implementation on field. In terms of forest owners are defined in Forest Management Plans and related (PEIF, PUB).</p> <p>Private forest lands can be grouped into Forest Intervention Areas (ZIFs), forest policy instrument to ensure efficient management of forests at the landscape scale and the consistent application of public support for forestry development. ZIFs are continuous land area, with a majority of forest areas, subject to a Forest Management Plan and a Defense Plan for Forest and managed by a single entity. Until July 2016 they are constituted 179 ZIF, covering 924,447 hectares of territory.</p> <p>One of the objectives of ZIFs is to reduce the conditions of ignition and fire spread implementing on the field planned measures.</p> <p>Field implementation of planned measures is uneven in Portugal. Also fires are the greatest perceived risks in the Portuguese forest sector as it recognized by public administration.</p> <p>On the above information specified risk is assessed on the fire management at forest level.</p>
Means of Verification	<p>Regional Best Management Practices</p> <p>Supply contracts</p> <p>Assessment of potential impacts at operational level and of measures to minimise impacts</p> <p>Monitoring results</p> <p>Regional, publicly available data from a credible third party</p> <p>The existence of a strong legal framework in the region</p> <p>Expert consultation</p>
Evidence Reviewed	<p>Estrategia Nacional das Florestas (RCM n.º 6-B/2015 - Diário da República n.º 24/2015, 1º Suplemento, Série I de 2015-02-04); ICNF portal (http://www.icnf.pt/portal/icnf/docref/enf)</p> <p>Programa Operacional de Sanidade Florestal, ICNF portal (http://www.icnf.pt/portal/florestas/prag-doe/posf)</p> <p>Fitossanidade florestal. Divulgação e informação, ICNF portal (http://www.icnf.pt/portal/florestas/prag-doe/divulg)</p> <p>Programas de Monitorização e Controlo de Pragas e Doenças, ICNF portal (http://www.icnf.pt/portal/florestas/prag-doe/resource/img/apr-progr-monit-c-pragas-e-d/view)</p> <p>Medias Controlo Nemátodo-da-Madeira-do-Pinheiro_03_2015, ICNF portal (http://www.icnf.pt/portal/florestas/prag-doe/resource/doc/divul/apresentacoes/2015-03-12/NMP_03_2015.pdf)</p> <p>Decreto lei 123-2015 nematodo do Pinheiro (https://dre.pt/application/file/67649256); ICNF portal (http://www.icnf.pt/portal/florestas/prag-doe/ag-bn/nmp)</p>

	<p>Declaração Retificação n.º 38/2015 de 01/09 (https://dre.pt/application/file/70144398)</p> <p>Inventário Florestal Nacional IFN5 (FloreStat_IFN5); ICNF portal (http://www.icnf.pt/portal/florestas/ifn/ifn5/rel-fin)</p> <p>Inventário Florestal Nacional IFN6, preliminary results (IFN6 - Resultados preliminares.pdf); ICNF portal (http://www.icnf.pt/portal/florestas/ifn/ifn6)</p> <p>Plano Nacional de Defesa da Floresta Contra Incêndios (https://dre.pt/application/dir/pdf1sdip/2006/05/102B00/35113559.pdf); ICNF portal (http://www.icnf.pt/portal/florestas/dfci/planos/PNDFCI)</p> <p>Zonas de Intervenção Florestal, ICNF portal (http://www.icnf.pt/portal/florestas/gf/zif/sit-ger-inf)</p> <p>Relatório-de-Characterização-da-Fileira-Florestal-2014 (http://www.aiff.org.pt/assets/Relatorio-de-Characterizacao-da-Fileira-Florestal-2014-160p-CAPA-3-spread....pdf)</p>
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	<ul style="list-style-type: none"> • Consultation of information sources and legislation regarding natural processes (fires, pests, invasive species, and diseases). • Analysis of information from the area regarding invasive species, diseases, resources for fire prevention and protection • Procedures for conduct field audits to verify these aspects if necessary. • Disqualify material coming from areas where natural processes, such as fires, pests and diseases, are not managed appropriately. • Promotion of Good Forest Practices • Monitoring plan

	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	<p>Unauthorized activities such as illegal logging, mining and encroachment are not a significant problem in Portugal.</p> <p>There are low scale problems as illegal littering, loose dogs, unauthorized sports, theft of firewood, wood or fruits, poaching. Illegal or unauthorised activities in Portuguese forests generally have limited economic or biological impact.</p> <p>There are also some problems related to Conversion which can be catalogued under unauthorized activities but they are described in its corresponding indicator (2.1.3).</p> <p>The indicator has been assessed as low.</p>
Means of Verification	<p>Records of BPs' field inspections</p> <p>Monitoring records</p> <p>Interviews with staff</p> <p>Interviews with stakeholders</p> <p>Publicly available information (News and media)</p>
Evidence Reviewed	<p>ILLEGAL LOGGING PORTAL, Portugal (http://www.illegal-logging.info/regions/portugal)</p> <p>Transparency international, corruption perception index Portugal (https://www.transparency.org/country/#PRT)</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	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	<p>There are no indigenous people in the country since Portuguese are native in their homeland. Also there are no national minorities that need special protection.</p> <p>97% of Portuguese forests are private. Approximated number of private owners in Portugal is over 500,000 people (5% of Portuguese population and 12.5% of families; so one in eight Portuguese people have familiar links to forest properties).</p> <p>8% of private forest are under communitarian management (Baldios) based in old customary and traditional tenure and rights and regulated by specific law.</p> <p>As most of the country forest is under private property civil code is applied which includes the following rights:</p> <ul style="list-style-type: none"> - to use; - to transform; - to exclude and defend including the rights to delimitation, prohibition and defense. - to return and compensation; - to sale. <p>These rights are applied to the most part of forest resources and to all of the wood resources.</p> <p>The customary rights include the right to entry inside forest properties, and even the recollection of private natural resources of free use like mushrooms or aromatic plants. This customary right does not include licensed fenced properties for cattle or large game hunting zones.</p> <p>Car circulation is limited to public use roads and/or public domain waters and other specific situations.</p> <p>Over the years, legislation about private things of free use became regulated and some of them of private use. Several situations may happen, for example the pine cones were of free use until forty years ago when it became private. Another example is the game hunting which is still a public thing but private entities can pay for a hunting concession to manage it.</p> <p>The rights of recollection of mushrooms, aromatic and medicinal plants still have a lack in legislation as 2009 Forest Code was revoked on 2012. This Code was giving more rights for these natural resources to land owners.</p>

	<p>Conflicts may exist between land owners rights based on the private things defense against the customary rights of accessing and free use recollection, as no specific legislation was updated about this issue. These conflicts may become more relevant where resources are easy to steal, like pine cones or other NTFP-Non Timber Forest Products.</p> <p>In the ground situations of use and abuse of fences and inadequate signs are common, including closed gates. In those situations, it is believed that customary rights are not respected, and there is a specified risk on this indicator. This specified risk doesn't include the licensed cattle parks or big game hunting areas.</p> <p>In the rest of situations, where the properties are not fenced, or being fenced they have ways to pass, the risk is assessed as low.</p>
Means of Verification	<p>Customary use rights are identified and documented</p> <p>Interviews with local communities and other stakeholders, indicate that their rights are being respected</p> <p>Appropriate mechanisms exist to resolve disputes</p> <p>Agreements exist regarding these rights</p>
Evidence Reviewed	<p>Estrategia Nacional das Florestas (RCM n.º 6-B/2015 - Diário da República n.º 24/2015, 1º Suplemento, Série I de 2015-02-04); ICNF portal (http://www.icnf.pt/portal/icnf/docref/enf)</p> <p>Lei nº 68-93 Baldios (http://www.proder.pt/ResourcesUser/Legisla%C3%A7%C3%A3o/Nacional/Lein%C2%BA68-93.pdf)</p> <p>Coelho, I.S. (2003) Propriedade da Terra e Política Florestal em Portugal (http://www.scielo.mec.pt/pdf/slu/v11n2/v11n2a05.pdf)</p> <p>Dec-Law n.º 254/2009 of 24/09 (http://www.proder.pt/ResourcesUser/Legisla%C3%A7%C3%A3o/Nacional/Decreto-Lein%C2%BA254-2009.pdf)</p> <p>Law n.º 12/2012 of 13/03 (https://dre.pt/application/dir/pdf1sdip/2012/03/05200/0110301103.pdf)</p> <p>Port. n.o 247/2001 of 22/03 (https://dre.pt/application/dir/pdf1sdip/2001/03/069B00/16111612.pdf)</p>
Risk Rating	<p><input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>

Comment or Mitigation Measure	<ul style="list-style-type: none">• Analysis of information from the area regarding use and abuse of fences and inadequate signs and closed gates• Procedures for conduct field audits to verify these aspects if necessary.• Disqualify material coming from areas where is confirmed the use and abuse of fences and inadequate signs and closed gates in a way that customary rights are not respected (except in case of licensed cattle parks or big game hunting areas).• Promotion of Good Forest Practices• Monitoring plan
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	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	<p>Subsistence needs for local communities are assessed as being not applicable for Portugal.</p> <p>Based on the above, it is concluded that there is a low risk of non-compliance with the requirement</p>
Means of Verification	
Evidence Reviewed	
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	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	<p>Grievances and disputes, including those relating to tenure and use rights, forest management practices and work conditions in Portugal are regulated by laws.</p> <p>Legal framework includes the Portuguese Constitution, the Labour Code and other specific regulations.</p> <p>The detailed procedures, duties and responsibilities of involved persons are defined in both legislation and other legal regulations. Legislation and justice system provides a route for appeal should people or companies be dissatisfied with the outcome of the dispute resolution process.</p> <p>Land tenure and use rights are object of Civil Code, being land tenure included on private property rights on Constitution article 62th. These rights include communitarian forests and also Forest Renting/leasing contracts.</p> <p>Disputes about forest management practices would involve forest authorities ICNF on both public and private forests. Specific forest management practices should be included on renting and forest services contracts as harvesting contracts.</p> <p>The disputes related to work conditions shall be resolved according to administrative procedures and labour legislation. Trade unions may help in disputes over work conditions.</p> <p>Based on the reviewed evidence it is concluded that there is a low risk of non-compliance with the requirement.</p>
Means of Verification	<p>Existing legal systems</p> <p>Level of enforcement</p> <p>Forest Best Management Practices</p> <p>Renting and harvesting contracts</p>
Evidence Reviewed	<p>Labour Code:</p> <p>•Law n.º 7/09 12/02 (http://www.act.gov.pt/(pt-PT)/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx)</p>

	<p><u>Portuguese Constitution</u></p> <p>Civil Code: http://www.pgdlisboa.pt/leis/lei_mostra_articulado.php?nid=775&tabela=leis</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	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	<p>Portugal has signed the ILO fundamental conventions, which includes the C87 Freedom of Association and Protection of the Right to Organize Convention (1948) on 1977th and C98 Right to Organize and Collective Bargaining Convention (1949) on 1964.</p> <p>This right is included on Portuguese constitution on article 56.</p> <p>Most part of working activities is covered by an annual working collective convention, which includes the forest sector.</p> <p>International Trade Union Confederation (IUTC) ranks 139 countries against 97 internationally recognised indicators to assess where workers' rights are best protected, in law and in practice. Portugal has a rating of 3, from 1 to 5+, in the ITUC Global Rights Index 2014. This score is given for countries where:</p> <p>(There are) "Regular violation of rights. The government and/or companies are regularly interfering in collective labour rights. There are deficiencies in laws and/or certain practices which make frequent violations possible."</p> <p>Authority directly involved on employment rights and conditions is Work Conditions Authority (ACT) but for many reasons other authorities are related to the issue, as Immigration and Borders Services (SEF) social security services or even tax services. All of them can make inspections to different issues related to work, with the joining of policies authorities as GNR-Republican National Guard and PSP-Public Security Police.</p> <p>ACT has strategic Plans for Agriculture and Forest activities and also does integrated inspections with Spanish authorities for agriculture and forestry activities. Recently one notice state that ACT bought a drone to help agriculture and forestry inspections.</p> <p>Inspective activities of ACT and SEF result on penalties or suspensions when illegal situations are found.</p> <p>It wasn't found law violations identified on the right of freedom of association and collective bargaining in Portuguese forest sector.</p> <p>According to the available information this indicator is classified as low risk.</p>

Means of Verification	<p>Legislation</p> <p>Level of enforcement</p> <p>Portuguese constitution</p> <p>Regional, publicly available data from a credible third party</p> <p>Publicly available information (News and media)</p>
Evidence Reviewed	<p>Agriculture, Food and Forest Union: http://www.setaa.pt/index.php/Geral/</p> <p>Boletim do Trabalho e Emprego: http://bte.gep.msess.gov.pt/ ; http://bte.gep.msess.gov.pt/completos/2016/bte4_2016.pdf</p> <p>WWW.ILO: http://www.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO::P13100_COMMENT_ID,P13100_LANG_CODE:3253858,en:NO</p> <p>Overview of ILO convention ratifications by Portugal: http://www.ilo.org/public/portugue/region/eurpro/lisbon/html/portugal_convencoes_numero_pt.htm</p> <p>ITUC Global RIGhTs Index The woRld's woRsT CoUnTRles foR workers: http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf</p> <p>Labor Code• Law n.º 7/09 12/02 and updates like L69/13, de 30/08 includes collective convention http://www.act.gov.pt/(pt-PT)/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx</p> <p>Portuguese Constitution</p> <p>Government sources:</p> <p>SEF Statistical Annual reports: http://sefstat.sef.pt/relatorios.aspx</p> <p>SEF Inspective news about forest sector: http://www.sef.pt/portal/v10/PT/asp/Noticias/Noticias_Detalhe.aspx?id_linha=7018 http://www.sef.pt/portal/v10/PT/asp/Noticias/Noticias_Detalhe.aspx?id_linha=6802</p> <p>ACT Annual Reports: http://www.act.gov.pt/(pt-PT)/SobreACT/DocumentosOrientadores/RelatorioActividades/Paginas/default.aspx</p> <p>News about ACT inspective work including forest: http://www.act.gov.pt/(pt-PT)/Itens/Noticias/Paginas/ACTeInspe%C3%A7%C3%A3odoTrabalhodeEspanhaema%C3%A7%C3%B5esconjuntas.aspx http://sol.sapo.pt/artigo/500544/utilizacao-de-drones-pela-inspeccao-geral-do-trabalho-gera-polemica</p>

	<p>ACT Strategic Plan for Agriculture and Forestry Activities: http://www.act.gov.pt/(pt-PT)/Campanhas/Campanhasrealizadas/Trabalho_Agricola_Florestal/Documents/Relat%C3%B3rio%20-%20Plano%20a%C3%A7%C3%A3o%20setor%20agr%C3%ADcola%20e%20florestal.pdf</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	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	<p>Portugal has ratified the convention against forced labour (nº29) in 1956.</p> <p>Portuguese legislation is applied against any form of compulsory labour in accordance with Article 160 of the Criminal Code, one who offers, gives, servicemen, calls accepts, transports, harbours or receives a person for the purpose of exploitation, including sexual exploitation, labour exploitation, begging, slavery, harvest organs or other exploitation by criminal activities and he / she has abused the authority resulting from a hierarchical relationship of dependency (whether financial, family or work related) is punished with imprisonment of three to ten years. Source: § (Article 160 of Decree-Law No. 400/82 Penal Code amended by Law No. 59/2007 and Law No. 60/2013)</p> <p>International Trade Union Confederation (IUTC) ranks 139 countries against 97 internationally recognised indicators to assess where workers' rights are best protected, in law and in practice. Portugal has a rating of 3, from 1 to 5+, in the ITUC Global Rights Index 2014. This score is given for countries where:</p> <p>(There are) "Regular violation of rights. The government and/or companies are regularly interfering in collective labour rights. There are deficiencies in laws and/or certain practices which make frequent violations possible."</p> <p>Some cases of compulsory labour were found on agriculture activities on recent years, and same data is available about those cases on Observatory on Traffic in Human Beings Reports.</p> <p>Authority directly involved on employment rights and conditions is Work Conditions Authority (ACT) but for many reasons other authorities are related to the issue, as Immigration and Borders Services (SEF) social security services or even tax services. All of them can make inspections to different issues related to work, with the joining of policies authorities as GNR-Republican National Guard and PSP-Public Security Police.</p> <p>ACT has strategic Plans for Agriculture and Forest activities and also does integrated inspections with Spanish authorities for agriculture and forestry activities. Recently one notice state that ACT bought a drone to help agriculture and forestry inspections.</p> <p>Inspective activities of ACT and SEF result on penalties or suspensions when illegal situations are found.</p> <p>Nevertheless, in forestry there wasn't found any evidence confirming the existence of risks of</p>

	<p>compulsory and/or forced labour in Portugal.</p> <p>According to the available information this indicator is classified as low risk.</p>
Means of Verification	<p>Legislation</p> <p>Level of enforcement</p> <p>Regional, publicly available data from a credible third party</p> <p>Publicly available information (News and media)</p>
Evidence Reviewed	<p>III National Plan to Prevent and Combat Trafficking in Human Beings 2014-2017 at http://www.igualdade.gov.pt/images/stories/documentos/legislacao/legislacao/Planos_Nacionais/2014-2017-iii-pnpc-tsh-en.pdf</p> <p>Observatory on Traffic in Human Beings: http://www.otsh.mai.gov.pt/Recursos/Pages/default.aspx</p> <p>Reports of Observatory on Traffic in Human Beings: 2015 ; 2014 ; 2013; 2012 ; 2011</p> <p>Overview of ILO convention ratifications by Portugal: http://www.ilo.org/public/portuguese/region/eurpro/lisbon/html/portugal_convencoes_numero_pt.htm</p> <p>ITUC Global RIGhTs Index The woRld's woRsT CoUnTRles foR workers: http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf</p> <p>Government sources:</p> <p>SEF Statistical Annual reports: http://sefstat.sef.pt/relatorios.aspx</p> <p>SEF Inspective news about forest sector: http://www.sef.pt/portal/v10/PT/asp/Noticias/Noticias_Detalhe.aspx?id_linha=7018 http://www.sef.pt/portal/v10/PT/asp/Noticias/Noticias_Detalhe.aspx?id_linha=6802</p> <p>ACT Annual Reports: http://www.act.gov.pt/(pt-PT)/SobreACT/DocumentosOrientadores/RelatorioActividades/Paginas/default.aspx</p> <p>News about ACT inspective work including forest: http://www.act.gov.pt/(pt-PT)/Itens/Noticias/Paginas/ACTeInspe%C3%A7%C3%A3oTrabalhodeEspanhaema%C3%A7%C3%B5esconjuntas.aspx http://sol.sapo.pt/artigo/500544/utilizacao-de-drones-pela-inspeccao-geral-do-trabalho-gera-polemica</p> <p>ACT Strategic Plan for Agriculture and Forestry Activities: http://www.act.gov.pt/(pt-PT)/Campanhas/Campanhasrealizadas/Trabalho_Agricola_Florestal/Documents/Relat%C3%B3rio%20-%20Plano%20a%C3%A7%C3%A3o%20setor%20agr%C3%ADcola%20e%20florestal.pdf</p>

Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	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	<p>In Portugal the minimum age for employment is 16 years. A minor of 16-year-old can't be used to carry out a paid activity delivered with autonomy unless he / she has completed compulsory education or is enrolled and attending secondary education, and is a work light. This light work should consist of simple tasks and is not likely to adversely affect the physical integrity, safety and health, school attendance, or their, moral, psychological, intellectual and cultural physical well-being. (Art.le 66-83 of the Labour Code) 2009.</p> <p>Portugal has ratified Minimum Age Convention (1973) C138 in 1989th and the convention C182 Worst Forms of Child Labour Convention (1999) on 2000th.</p> <p>International Trade Union Confederation (IUTC) ranks 139 countries against 97 internationally recognised indicators to assess where workers' rights are best protected, in law and in practice. Portugal has a rating of 3, from 1 to 5+, in the ITUC Global Rights Index 2014. This score is given for countries where:</p> <p>(There are) "Regular violation of rights. The government and/or companies are regularly interfering in collective labour rights. There are deficiencies in laws and/or certain practices which make frequent violations possible."</p> <p>UNICEF report 2012 "Measuring Child Poverty was rating 14,7% of Portuguese children below 16 years age as below "poverty line".</p> <p>Robust data about child labour are not recent, as the last official inquiry report is from 2001, and the results were not positive as 4,1% of children of the study were affected by child labour (CNAsti), with half of this proportion related to agriculture.</p> <p>2015: FSC Portugal CNRA report states "Despite evidence of some (remaining) cases of child labour, there is evidence that this problem is not structural nor of large size. No evidence found of cases of child labour in the forest sector. The national CWRA explicitly mentions "child labour in the forest sector in Portugal is very low". There is evidence that the number of minors working illegally is rather insignificant.</p> <p>Authority directly involved on employment rights and conditions is Work Conditions Authority (ACT) but for many reasons other authorities are related to the issue, as Immigration and Borders Services (SEF) social security services or even tax services. All of them can make inspections to different issues related to work, with the joining of policies authorities as GNR-Republican National Guard and PSP-Public Security Police.</p>

	<p>ACT has strategic Plans for Agriculture and Forest activities and also does integrated inspections with Spanish authorities for agriculture and forestry activities. Recently one notice state that ACT bought a drone to help agriculture and forestry inspections.</p> <p>Inspective activities of ACT and SEF result on penalties or suspensions when illegal situations are found.</p> <p>Nevertheless, based on the available information it wasn't found any evidence confirming the existence of risks of child labour in forestry in Portugal</p>
Means of Verification	<p>Existing legislation</p> <p>Level of enforcement</p> <p>Regional, publicly available data from a credible third party</p> <p>Publicly available information (News and media)</p>
Evidence Reviewed	<p>Legislation:</p> <p>Labor Code•:Law n.º 7/09 from 12/02 http://www.act.gov.pt/(pt-PT)/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx</p> <p>Law n.º 47/2012, de 29/08 at http://www.cnasti.pt/cnasti/documentos/1403451265.pdf</p> <p>Decree Republic President 28/2000 1/06 at http://www.ilo.org/public/portugue/region/eurpro/lisbon/pdf/conv_182.pdf</p> <p>Republic Assembly Resolution 11/98 at http://www.ilo.org/public/portugue/region/eurpro/lisbon/pdf/conv_138.pdf</p> <p>Government sources:</p> <p>SEF Statistical Annual reports: http://sefstat.sef.pt/relatorios.aspx</p> <p>SEF Inspective news about forest sector: http://www.sef.pt/portal/v10/PT/asp/Noticias/Noticias_Detalhe.aspx?id_linha=7018 http://www.sef.pt/portal/v10/PT/asp/Noticias/Noticias_Detalhe.aspx?id_linha=6802</p> <p>ACT Annual Reports: http://www.act.gov.pt/(pt-PT)/SobreACT/DocumentosOrientadores/RelatorioActividades/Paginas/default.aspx</p> <p>News about ACT inspective work including forest: http://www.act.gov.pt/(pt-PT)/Itens/Noticias/Paginas/ACTeInspe%C3%A7%C3%A3odoTrabalhodeEspanhaema%C3%A7%C3%B5esconjuntas.aspx http://sol.sapo.pt/artigo/500544/utilizacao-de-drones-pela-inspeccao-geral-do-trabalho-gera-polemica</p> <p>ACT Strategic Plan for Agriculture and Forestry Activities:</p>

	<p>http://www.act.gov.pt/(pt-PT)/Campanhas/Campanhasrealizadas/Trabalho_Agricola_Florestal/Documents/Relat%C3%B3rio%20-%20Plano%20a%C3%A7%C3%A3o%20setor%20agr%C3%ADcola%20e%20florestal.pdf</p> <p>Other Sources:</p> <p>Overview of ILO convention ratifications by Portugal: http://www.ilo.org/public/portugue/region/eurpro/lisbon/html/portugal_convencoes_numero_pt.htm</p> <p>Social characterization of aggregates Portuguese Family with Children in School Age http://www.cnasti.pt/cnasti/documentos/1403450788.pdf</p> <p>UNICEF Innocenti Research Centre (2012), '<i>Measuring Child Poverty: New league tables of child poverty in the world's rich countries</i>', Innocenti Report Card 10, UNICEF Innocenti Research Centre, Florence at</p> <p>ITUC Global RiGhTs Index The woRld's woRsT CoUnTRles foR workers: http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	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	<p>Protection against discrimination in labour is included in Portuguese constitution (Article 55th), and labour code.</p> <p>Portugal has ratified ILO convention about discrimination on work and career C111 (1958) on year 1959th. Also convention about equal remuneration C100 was ratified on year 1966th.</p> <p>Portugal is well positioned at majority of international reports:</p> <ul style="list-style-type: none"> -Corruption Perception Index scores 63 meaning low perceived level of corruption ; -Worldwide Governance Indicators (WGI) from 73.3 to 84.13 (1-100points) <p>The WGI report six aggregate governance indicators for over 200 countries and territories over the period 1996-2014, covering 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.</p> <ul style="list-style-type: none"> -Free country on press, net, political rights and civil liberties. <p>On the other side Portugal (including human rights, illegal logging , forest and timber) is not listed in alarming reports or indexes such as:</p> <ul style="list-style-type: none"> - Committee to Protect Journalists Impunity Index; - Human Rights Watch; - Global Witness - Chatham House - Amnesty International <p>Some observations were found about women discrimination on jobs and remuneration and gender pay gap (see <i>below Direct Request (CEACR) - adopted 2014, published 104th ILC session (2015) Equal Remuneration Convention, 1951 (No. 100) – Portugal</i>).</p> <p>Also discrimination episodes were found against Roma and LGB (see <i>below Amnesty International 2014/2015 report The State of the World's Human Rights</i>) but not related to work activities.</p> <p>Authority directly involved on employment rights and conditions is Work Conditions Authority (ACT) but for many reasons other authorities are related to the issue, as Immigration and Borders Services (SEF) social security services or even tax services. All of them can make inspections to different issues related to work, with the joining of policies authorities as GNR-Republican National Guard and PSP-Public Security Police.</p>

	<p>ACT has strategic Plans for Agriculture and Forest activities and also does integrated inspections with Spanish authorities for agriculture and forestry activities. Recently one notice state that ACT bought a drone to help agriculture and forestry inspections.</p> <p>Inspective activities of ACT and SEF result on penalties or suspensions when illegal situations are found.</p> <p>Based on the available information, it wasn't found any evidence that confirms the existence of risks of discrimination against in respect of employment and occupation in forestry in Portugal.</p>
Means of Verification	<p>Existing legislation</p> <p>Level of enforcement</p> <p>Regional, publicly available data from a credible third party</p> <p>Publicly available information (News and media)</p>
Evidence Reviewed	<p>Legislation:</p> <ul style="list-style-type: none"> •Portuguese Constitution •Labor Code: Law n.º 7/09 from 12/02 http://www.act.gov.pt/(pt-PT)/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx •Dec-Law 42520/1959 23/09 at http://www.ilo.org/public/portugue/region/eurpro/lisbon/pdf/conv_111.pdf •Dec-Law 47 302/1966 on 04/11 at http://www.ilo.org/public/portugue/region/eurpro/lisbon/pdf/conv_100.pdf <p>Other sources:</p> <ul style="list-style-type: none"> •Transparency International http://www.transparency.org/cpi2015#map-container •UN Sanctions List at: https://www.un.org/sc/suborg/en/sanctions/un-sc-consolidated-list •World Bank: Worldwide Governance Indicators http://info.worldbank.org/governance/wgi/index.aspx#countryReports •Freedom house: https://freedomhouse.org/report/freedom-world/freedom-world-2016 •Committee to Protect Journalists https://www.cpj.org/reports/2014/04/impunity-index-getting-away-with-murder.php •Human Rights Watch: http://www.hrw.org/world-report/2015 •Global Witness: www.globalwitness.org <p>Chattam House Illegal Logging Indicators Country Report Card http://www.illegal-logging.info</p> <ul style="list-style-type: none"> •Amnesty International 2014/2015 report: https://www.amnesty.org/en/documents/pol10/0001/2015/en/ •Direct Request (CEACR) - adopted 2014, published 104th ILC session (2015) <p>Equal Remuneration Convention, 1951 (No. 100) – Portugal</p>

	<p>http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:13100:0::NO::P13100_COMMENT_ID:3186668</p> <p>•Overview of ILO convention ratifications by Portugal: http://www.ilo.org/public/portuguese/region/eurpro/lisbon/html/portugal_convencoes_numero_pt.htm</p> <p>SEF Statistical Annual reports: http://sefstat.sef.pt/relatorios.aspx</p> <p>SEF Inspective news about forest sector: http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=7018 http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=6802</p> <p>ACT Annual Reports: http://www.act.gov.pt/(pt-PT)/SobreACT/DocumentosOrientadores/RelatorioActividades/Paginas/default.aspx</p> <p>News about ACT inspective work including forest: http://www.act.gov.pt/(pt-PT)/Itens/Noticias/Paginas/ACTeInspe%C3%A7%C3%A3odoTrabalhodeEspanhaema%C3%A7%C3%B5esconjuntas.aspx http://sol.sapo.pt/artigo/500544/utilizacao-de-drones-pela-inspeccao-geral-do-trabalho-gera-polemica</p> <p>ACT Strategic Plan for Agriculture and Forestry Activities: http://www.act.gov.pt/(pt-PT)/Campanhas/Campanhasrealizadas/Trabalho_Agricola_Florestal/Documents/Relat%C3%B3rio%20-%20Plano%20a%C3%A7%C3%A3o%20setor%20agr%C3%ADcola%20e%20florestal.pdf</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	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	<p>Minimum wage is included in Portuguese constitution (Article 59th), and labour code.</p> <p>Portugal has ratified ILO convention about minimum wage C131 (1970) on year 1981th. Also convention about salary protection C95 was ratified on year 1981th.</p> <p>Payment and employment conditions are included and are updated on labour code.</p> <p>Authority directly involved on employment conditions is Work Conditions Authority (ACT) but for many reasons other authorities are related to the issue, as Immigration and Borders Services (SEF) social security services or even tax services. All of them can make inspections to different issues related to work, with the joining of policies authorities as GNR-Republican National Guard and PSP-Public Security Police.</p> <p>ACT has strategic Plans for Agriculture and Forest activities and also does integrated inspections with Spanish authorities for agriculture and forestry activities. Recently one notice state that ACT bought a drone to help agriculture and forestry inspections.</p> <p>Inspective activities of ACT and SEF result on penalties or suspensions when illegal situations are found.</p> <p>According to the available information about employment conditions, there is a legal framework in the country, and there are legal authorities to enforce legislation. So it is considered that Portugal has low risk that pay and employment conditions are not fair and doesn't meet, or exceed, minimum requirements.</p>
Means of Verification	<p>Existing legislation</p> <p>Level of enforcement</p> <p>Regional, publicly available data from a credible third party</p> <p>Publicly available information (News and media)</p>
Evidence Reviewed	<p>Legislation:</p> <ul style="list-style-type: none"> •Portuguese Constitution •Labor Code: Law n.º 7/09 from 12/02 http://www.act.gov.pt/(pt-PT)/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx <p>Dec-Law: 77/81 on 19/06 at http://www.ilo.org/public/portugue/region/eurpro/lisbon/pdf/conv_131.pdf</p>

Evidence Reviewed	<p>Dec-Law: 88/81 on 14/07 at http://www.ilo.org/public/portugue/region/eurpro/lisbon/pdf/conv_95.pdf</p> <p>Government sources: SEF Statistical Annual reports: http://sefstat.sef.pt/relatorios.aspx SEF Inspective news about forest sector: http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=7018 http://www.sef.pt/portal/v10/PT/asp/noticias/Noticias_Detalhe.aspx?id_linha=6802</p> <p>ACT Annual Reports: http://www.act.gov.pt/(pt-PT)/SobreACT/DocumentosOrientadores/RelatorioActividades/Paginas/default.aspx</p> <p>News about ACT inspective work including forest: http://www.act.gov.pt/(pt-PT)/Itens/Noticias/Paginas/ACTeInspe%C3%A7%C3%A3oTrabalhodeEspanhaema%C3%A7%C3%B5esconjuntas.aspx http://sol.sapo.pt/artigo/500544/utilizacao-de-drones-pela-inspeccao-geral-do-trabalho-gera-polemica</p> <p>ACT Strategic Plan for Agriculture and Forestry Activities: http://www.act.gov.pt/(pt-PT)/Campanhas/Campanhasrealizadas/Trabalho_Agricola_Florestal/Documents/Relat%C3%B3rio%20-%20Plano%20a%C3%A7%C3%A3o%20setor%20agr%C3%ADcola%20e%20florestal.pdf</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	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	<p>Portugal has ratified convention ILO 184 on 2012, about agriculture health and safety in agriculture which includes forestry activities with exception of industrial forest harvesting.</p> <p>ILO forestry H & S code includes some of forestry activities on “high risk operations” such as climbing above 3m, but in Portuguese legislation any forestry activity is included on legal list of “High Risk Activity”.</p> <p>Work legislation aims to create a safe and healthy work environment at all times in accordance with society’s technical and social development.</p> <p>Historically, a risk under this category has been present based on a low level of compliance with the requirements for accreditation and/or professional training.</p> <p>In recent years, many obligations have changed and private entities have started to develop courses for some activities of forest workers (for example for chainsaw, machinery or phytopharmaceuticals users). There continues to be a lack of credible courses for some forest activities with lower levels of risk, such as cork or resin harvesters.</p> <p>Legal authority for work health and safety is ACT, who as an inspective role on the ground which includes the responsibility of evaluation and report work accidents that are recorded at hospitals.</p> <p>Other work accidents statistics source is GEP-Gabinete de Estratégia e Planeamento (Strategy and Planning Cabinet) which compile data about accidents which involved insurance companies.</p> <p>Public statistical data doesn’t provide clarity on the actual level of workplace accidents or even intensity of inspections, because forest accidents are included in statistics also covering agriculture and sometimes fisheries activities, and inspections data include agriculture and forest activities. However a further research with authorities (ACT) could show that the forestry sector had an increasing of fatal accidents since 2014 (respectively 2 on year 2014, 4 on year 2015 and 7 on year 2016 until October the 20th). These numbers could show that the average rate of fatal accidents per 100 000 workers (above 58) is jumping very much far beyond the average EU rate from last available report (24 to 30) according to report with data from 2000-2005 (Safety and health in the European forestry sector/Malcolm Gifford; International Labour Office, Sectoral Activities Department – Geneva: ILO, 2009).</p> <p>International Trade Union Confederation (IUTC) ranks 139 countries against 97 internationally recognised indicators to assess where workers’ rights are best protected, in law and in practice.</p>

	<p>Portugal has a rating of 3, from 1 to 5+, in the ITUC Global Rights Index 2014. This score is given for countries where:</p> <p>(There are) “Regular violation of rights. The government and/or companies are regularly interfering in collective labour rights. There are deficiencies in laws and/or certain practices which make frequent violations possible.”</p>
Means of Verification	<ul style="list-style-type: none"> • Accredited professional courses (p.e. chainsaws, machinery operator, phytopharmaceuticals applicator) card and/or specific certificates of training sessions. • Records of H& S procedures and Personal Protection Equipment distribution by the Organization. • Record of machinery safety tools and equipments on original documental register.
Evidence Reviewed	<p>Government sources</p> <ul style="list-style-type: none"> • Labour Conditions Authority-ACT http://www.act.gov.pt/(pt-PT)/Paginas/default.aspx • Work accident statistics from ACT http://www.act.gov.pt/(pt-PT)/CentroInformacao/Estatistica/Paginas/AcidentesdeTrabalhoGraves.aspx http://www.act.gov.pt/(pt-PT)/CentroInformacao/Estatistica/Paginas/AcidentesdeTrabalhoMortais.aspx http://www.act.gov.pt/(pt-PT)/crc/PublicacoesElectronicas/Documents/RelatorioAtividadesPromocaoSegurancaSaudeTrabalho2015.pdf • General Direccion of Social Security :http://www.seg-social.pt/dgss-direccao-geral-da-seguranca-social • Employment and Professional Training Institute at https://www.iefp.pt/ <p>Strategy and Planning Cabinet: http://www.gep.msess.gov.pt/estatistica/acidentes/index.php</p> <p>Non-Government sources</p> <p>Safety and health in the European forestry sector – The impact of more open markets and of increased regulation: http://www.ilo.org/wcmsp5/groups/public/---ed_dialogue/---sector/documents/publication/wcms_160880.pdf</p> <p>Guidelines for labour inspection in forestry: http://www.ilo.org/wcmsp5/groups/public/---ed_protect/---protrav/---safework/documents/normativeinstrument/wcms_107610.pdf</p> <p>Code of Practice: Safety and Health in forestry work: http://www.ilo.org/wcmsp5/groups/public/---ed_protect/---protrav/---safework/documents/normativeinstrument/wcms_107793.pdf</p> <p>ITUC Global RIGHTs Index The woRld's woRsT CoUnTRies foR workers: http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf</p>

	<ul style="list-style-type: none"> •SETAA-Sindicato da Agriculture, Alimentação e Florestas: at http://www.setaa.pt/ •UGT-União Geral de Trabalhadores at https://www.ugt.pt/ •CGTP - Confederação Geral de Trabalhadores Portugueses at http://www.cgtp.pt/ <p>Legislation</p> <p>Labor Code• Código do Trabalho :Lei n.º 7/09 12/02 artº127º i) http://www.act.gov.pt/(pt-PT)/Legislacao/Codigodotrabalhoatualizado/Paginas/default.aspx</p> <ul style="list-style-type: none"> • Resolução da Assembleia da República nº109/2012 de 08/08 art 6º (Convention 184 doesn't apply to industrial forest work) http://dre.pt/util/getpdf.asp?s=diad&serie=1&iddr=2012.153&iddip=20121525 •Aviso n.º 6/2014. 01/09 https://dre.pt/util/getpdf.asp?s=diad&serie=1&iddr=2014.6&iddip=20140033 •Law nº 3/2014 from 28/01 https://dre.pt/application/dir/pdf1sdip/2014/01/01900/0055400591.pdf •DLnº441/91, de 14/11capIII • DL nº133/99, de 21/04 artº1º • DL nº26/94, de 1/02 artº3º •Lei n.º 98/2009, de 04/09 artº7º •DLnº 128/93, de 22/04 artº1º • Port. 988/93, de 06/10; • DL nº141/95, de 14/06 artº5º •Portaria n.º 1456-A/95, de 11/10; artº2º • DL nº331/93 de 25/09, artº4º DLnº 330/93, de 25/09 artº4º • DL 182/2006, de 6/09 , artº4º • NP 2761:1988 <p>Law 102/2009 10/09 :http://www.dgpi.mj.pt/sections/leis-da-justica/pdf-ult2/lei-n-102-2009-de-10-de/downloadFile/file/lei_102.2009.pdf?nocache=1252570336.84</p> <p>High Risk Works and Activities: http://www.act.gov.pt/(pt-PT)/PromocaoSST/RegulacaoServicosSST/Documents/anexos/CAE_20%2005%202014.pdf</p> <ul style="list-style-type: none"> •Health and Safety Guide for Agroforestry works: http://www.act.gov.pt/(pt-PT)/Itens/Noticias/Documents/Seguran%C3%A7a%20e%20Saude%20no%20Trabalho%20no%20Setor%20Agro-Florestal.pdf
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	<ul style="list-style-type: none"> • Suppliers training and qualification. • Confirmation of legal status of qualified suppliers in relation with health and safety requirements. • Procedures for conduct monitoring field audits to verify all the aspects related with health and safety of forest workers.

	<ul style="list-style-type: none">• Disqualify material coming from areas where there are insufficient or inappropriate safeguards to protect the health and safety of forest workers.• Promotion of Good Forest Practices• Monitoring plan
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	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	<p>The high carbon stocks are considered to be in wetlands, peatlands (no forested areas related) and old mature forests stands.</p> <p>Information regarding wetlands in Portugal states that as usual in the region they are threatened ecosystems even when they are protected. Portugal currently has 1.8% of its territory occupied by wetlands, 79% of which is protected by the Ramsar Convention, covering this protection figure of 31 sites (about 132,487 hectares). 82% of habitats related to wetlands are degraded. Epic WebGis Portugal provides geographical information about wetlands.</p> <p>In the revised information one relevant risks is associated to forestry: cutting of riparian vegetation so specified risk needs to be assessed on this issue. BP shall ensure that feedstock come from riparian vegetation in wetlands complies with legislation (felling license) and do not affect to carbon stocks.</p> <p>Related to old mature forest stands, there is information available in the Habeas (Hotspot Areas for Biodiversity and Ecosystem Services) web page. This web page provides information about important areas for carbon storage related to oak forests (cork oak, holm oak and others).</p> <p>Legislation in Portugal is strong related to Cork and Holm oak (protected species) but not related to other type of oaks. It was found several complaints over the years about felling of oaks all around Portugal.</p> <p>Statistics and information revised shows that there are small examples of old mature forests from other oaks (<i>Quercus robur</i>, <i>Quercus faginea</i>, <i>Quercus pyrenaica</i>, <i>Quercus canariensis</i>) in Portugal, approximately 5,000 has of oaks older than 50 years regarding IFN5. As an example situation of <i>Quercus faginea</i> (Portuguese oak). In the first National Forest Inventory (1972/74) Portuguese oak stands that occupy at least 2 ha covers 2180 ha. In 1995 results just met 1221 ha occupied by stands. Reduction of 44%.</p> <p>Despite the small scale and because of the relevance of the associated habitat specified risk needs to be assessed on this issue. BP shall ensure that oaks feedstock do not come from the felling/conversion of old mature oak stands after 2008.</p>

Means of Verification	<p>Maps, WebPages</p> <p>Procedures and records</p> <p>Regional, publicly available data from a credible third party</p> <p>The existence of a strong legal framework in the region</p> <p>Interviews with experts</p>
Evidence Reviewed	<p>HABEaS -Hotspot Areas for Biodiversity and Ecosystem Services; important areas for carbon storage (http://www.habeas-med.org/webgis/pt_en/)</p> <p>Epic WebGis Portugal (http://epic-webgis-portugal.isa.ulisboa.pt/)</p> <p>Quercus NGO (http://www.quercus.pt/comunicados/2011/fevereiro/522-zonas-humidas-continuam-ameacadas-em-portugal)</p> <p>Quercus NGO (http://www.quercus.pt/comunicados-floresta/593-2013/2982-corte-de-sobreiros-em-santa-maria-da-feira-para-construcao-de-novo-parque-empresarial), (http://www.quercus.pt/comunicados/2014/junho/3707-abate-de-sobreiros-na-zona-de-proteccao-especial-do-estuario-de-tejo-em-benavente); (http://www.quercus.pt/comunicados/2012/setembro/43-abate-ilegal-de-centenas-sobreiros-e-carvalhos-portugueses-no-parque-natural-do-sudoeste-alentejano-e-costa-vicentina)</p> <p>ICNF habitat 7140; peatlands/turfeiras (http://www.icnf.pt/portal/naturaclas/rn2000/resource/docs/rn-plan-set/hab/hab-7140)</p> <p>ICNF habitat 9230; oak forests (http://www.icnf.pt/portal/naturaclas/rn2000/resource/docs/rn-plan-set/hab/hab-9230)</p> <p>A distribuição do Carvalho Português (http://naturlink.pt/article.aspx?menuid=3&cid=1145&bl=1&viewall=true)</p> <p>MedWet Mediterranean wetlands initiative (http://medwet.org/aboutwetlands/)</p> <p>Inventario Florestal Nacional IFN5 (FloreStat_IFN5); ICNF portal (http://www.icnf.pt/portal/florestas/ifn/ifn5/rel-fin)</p> <p>Inventario Florestal Nacional IFN6, preliminary results (IFN6 - Resultados preliminares.pdf); ICNF portal Law 58/2005 29/12; Law 54/2005, at 15/11 (Artº 25º)</p> <p>Titularidade dos recursos hídricos (https://dre.pt/application/dir/pdf1sdip/2005/11/219A00/65206525.pdf)</p>
Risk Rating	<p><input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>

Comment or Mitigation Measure	<ul style="list-style-type: none">• Consultation of information sources regarding high carbon stocks areas (wetlands, peatlands and old mature forests stands).• Analysis of information from the area regarding the riparian vegetation and old mature forests stands.• Procedures for conduct monitoring field audits to verify if biomass is sourced from areas that had high carbon stocks in January 2008 and no longer have those high carbon stocks.• Disqualify material coming from areas that had high carbon stocks in January 2008 and no longer have those high carbon stocks.• Promotion of Good Forest Practices• Monitoring plan
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	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	<p>It was found on information reviewed that according to National Inventory (APA, I.P., 2014), from 1990 to 2012 forests are a net carbon sink, with annual sequestration values ranging between -11 MtCO₂ eq and -18 MtCO₂ eq.</p> <p>However on its 2015 report it is stated the negative impact of forest fires (..) <i>Estimates of emissions and sinks from land use change and forestry category show that this category has changed from being a net emitter in 1990 (1.8 Mt CO₂ eq.) to a carbon sink in 1992. This situation was again reverted in the years 2003 and 2005 due to the severe forest wildfires events registered in these years. In 2013 this sector represents a sequester of -9.4 Mt CO₂e..</i></p> <p>Questions regarding forest fires are addressed at indicators 2.4.1 and 2.4.2.</p> <p>Under this information this indicator can be assessed at low risk.</p>
Means of Verification	<p>Results of analysis</p> <p>Regional, publicly available data from a credible third party</p> <p>The existence of a strong legal framework in the region.</p> <p>Interviews with experts</p>
Evidence Reviewed	<p>Estrategia Nacional das Florestas (RCM n.º 6-B/2015 - Diário da República n.º 24/2015, 1º Suplemento, Série I de 2015-02-04); ICNF portal (http://www.icnf.pt/portal/icnf/docref/enf)</p> <p>Relatório-de-Characterização-da-Fileira-Florestal-2014 (http://www.aiff.org.pt/assets/Relatorio-de-Characterizacao-da-Fileira-Florestal-2014-160p-CAPA-3-spread....pdf) Portuguese National Inventory Report on Greenhouse Gases 1990 - 2013 http://www.apambiente.pt/zdata/Inventario/NIR_global_20151030_UNFCCC.pdf</p>
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
2.10.1	Genetically modified trees are not used.
Finding	<p>In Portugal there is not a specific legal framework for GMO trees, but for all vascular plants. This legislation doesn't prohibit commercial use of GMO plants which is legal in the country since 1999. However, only corn (maize) is cultivated (around 6% of the total production).</p> <p>It hasn't been found any recent trial of GM trees in the country. Only related notice was from 1997 when Stora Enso trialed a modified variety of <i>Eucalyptus globulus</i>, which was concluded on 2001.</p> <p>The company (Stora Enso) is no longer in Portugal, but is still an industrial global pulp and paper player with interests in GMO.</p> <p>A low risk conclusion is justified because it was not evidenced interest for GMO use in the forestry sector.</p>
Means of Verification	<ul style="list-style-type: none"> •List of species used. •EU Register of authorised GMOs http://ec.europa.eu/food/dyna/gm_register/index_en.cfm
Evidence Reviewed	<ul style="list-style-type: none"> •DL 55/2015 at 17/04 http://apambiente.pt/zdata/Politicass/MGM/DL%2055_2015.pdf •DL 72/2003 de 10/04 (http://apambiente.pt/zdata/Politicass/OGM/DL_72_2003.pdf) •APA-Agência Portuguesa de Ambiente at webpage: http://apambiente.pt/index.php?ref=16&subref=85&sub2ref=430 •DGAV- Direção Geral de Alimentação e Veterinária webpage: http://www.dgv.min-agricultura.pt/portal/page/portal/DGV/genericos?generico=3665233&cboui=3665233 •Plataforma Transgénicos Fora at http://stopogm.net/ensaios •EU Register of authorised GMOs http://ec.europa.eu/food/dyna/gm_register/index_en.cfm •Global Forest Registry: http://www.globalforestregistry.org/
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	