



# Supply Base Report: IBV & CIE SA

## Main (Initial) Audit

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# Completed in accordance with the Supply Base Report Template Version 1.5

For further information on the SBP Framework and to view the full set of documentation see [www.sbp-cert.org](http://www.sbp-cert.org)

## *Document history*

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## 2 Description of the Supply Base

### 2.1 General description

**Feedstock types:** Secondary, Primary, Tertiary

**Includes Supply Base evaluation (SBE):** No

**Includes REDII SBE:** Yes

**Feedstock origin (countries):** Belgium, Germany, Luxembourg, France, Netherlands, Norway

### 2.2 Description of countries included in the Supply Base

**Country:** Belgium

**Area/Region:** All

**Exclusions:** No

#### **Introduction to Industrie du Bois Vielsalm & Cie s.a. (IBV) and its supply chains**

Industrie du Bois Vielsalm & Cie s.a. (IBV) founded in 1997, is a sawmill and pellets producer situated in Vielsalm on the border between Belgium and Luxembourg. IBV is part of the "Wood and Energy Group International" which produce sawn timber, solid structural timber, wood pellets and renewable energy in the form of electricity and heat at their 3 production sites in Belgium and Germany. The wood comes from EU and the group can add value to all parts of the trunk by making optimum use of the synergies between material and energy cycles.

The site in Vielsalm is the largest in the group. It is here that regional softwoods are processed into sawn timber. The resulting sawmill by-products of sawdust and wood chips are used on site to produce wood pellets, providing about 50,000 families with a sustainable source of heat. The site also has a biomass co-generation plant that uses wood residues for which there is no alternative use to produce green electricity and heat. The part of the electricity generated that is not needed internally is fed into the public grid. The heat is used completely in production processes, ensuring the plant's extremely high level of efficiency.

The pelletizing plant has a capacity of 420.000 tonnes a year and produces 6 mm pellets according to the ENplus A1 and/or SBP standards.

IBV is a PEFC certified pellet producer. IBV pellet factory receive sawdust from IBV sawmill, from the group sawmills in Germany and a few other suppliers of secondary feedstock. Indirectly the wood comes from 200-250 suppliers, mainly sawmills and vertically integrated wood processors. IBV use a mix of primary (low grade logs) and secondary feedstock (wood residues such as sawdust and shavings) and a small fraction of tertiary feedstock (planing chips). Around 50% of feedstock for the pellet factory is SBP-

compliant feedstock (PEFC FM or CoC certified), divided into feedstock types for the pellet plant and powerplant as follows: around 23% primary feedstock, around 65% secondary feedstock and about 12% tertiary feedstock.

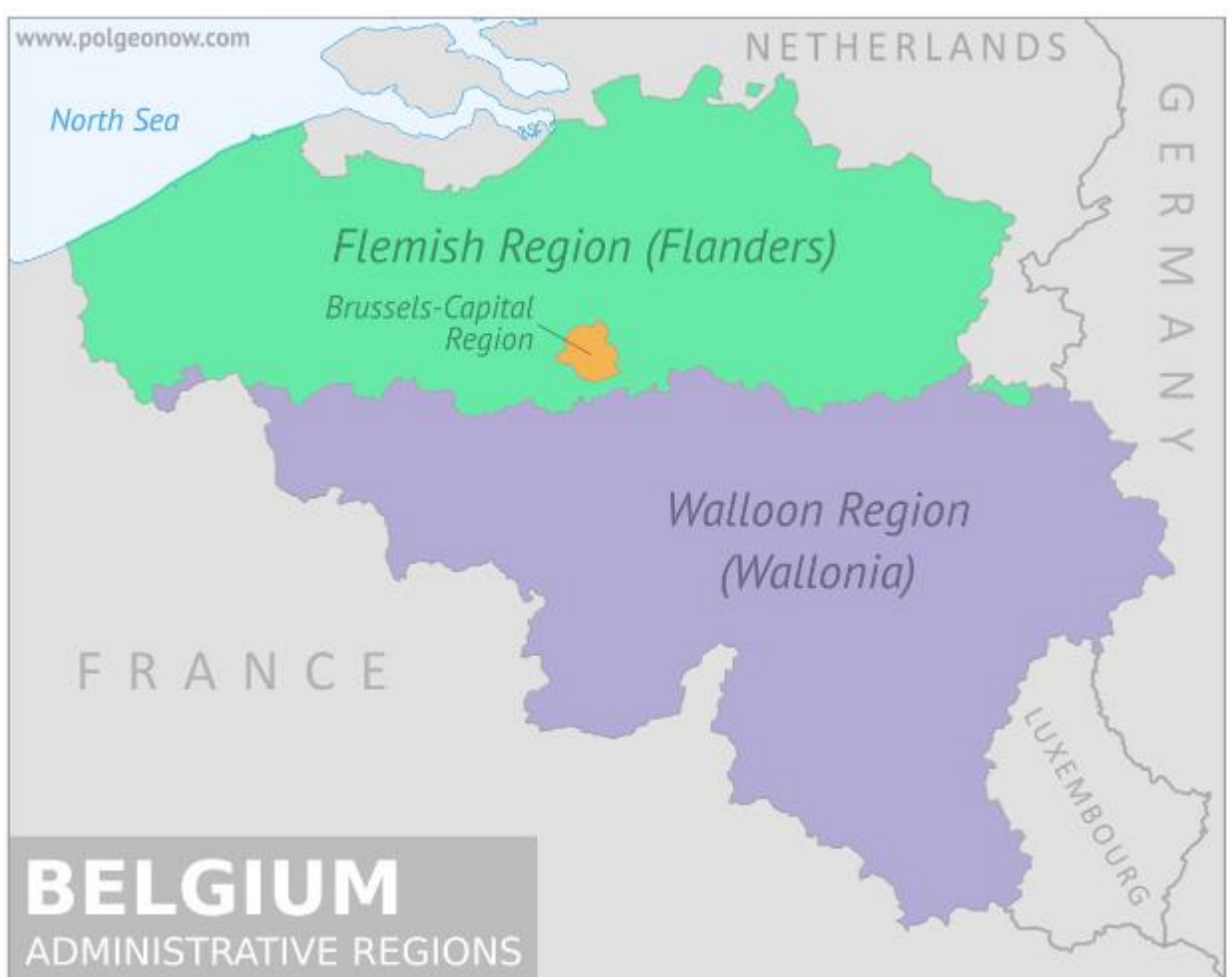
IBV has no direct impact on forest management practices. However, by buying from PEFC and/or FSC certified companies, IBV does guarantee that best practices are promoted and no locally protected tree species are harvested.

Regarding the regional forest and wood sector, IBV is a large-size company. Considering specifically the use of wood residues, there are a very few similar in size companies in the region. By producing wood pellets, IBV adds value to low-grade wood residues and creates jobs.

### Supply Base Belgium

In Belgium, IBV have 50-100 suppliers of primary feedstock (low grade sawlogs), approximately 50% are PEFC certified; 25 -50 suppliers of secondary feedstock, approximately 50% are PEFC certified and less than 10 suppliers of tertiary feedstock.

### Forest Cover (1)



Traditionally Belgium is divided into 3 “gewesten” or regions; the Flemish Region, the Brussels-Capital Region and the Walloon Region. For the purpose of this supply base description the same separation is made because forest law and regulations are different.

Around 23 % of Belgium is covered with forests, totalling a number of a little more than 700.00 hectares. From this 78,9 % can be found in the Walloon region, 20,7 % in the Flemish region and 0,3% in the Brussels-Capital Region.

The main tree species in Belgium are(2):

Norway spruce (app. 34 %)

Oak (app. 18 %)

Beech (app. 12%)

Scots pine (app. 7%)

Poplar (app. 5%)

Other species (24 %)

### **Ownership (1)**

55 % of all forests are owned by around 100.000 private owners, with an average of 2,5 ha per owner. 45 % of the forests are owned by the public ('gewesten/regions' (11%), municipalities (28%), provinces and other organisations like the church (3%).

None of the country's primary forests remain, and 58% of existing forest cover comprises forest plantations. Forests owned by private persons are mainly plantations (predominantly poplar or pine in Flanders, and spruce or other conifers in Wallonia). Public forests, as well as forests owned by nature conservation organizations, are rather mixed forests and generally have a higher share of broadleaved tree species (oak, beech, etc.).

### **Management (3)**

#### Forest management in Flanders:

Timber harvesting is regulated by the Forest Decree of 13 June 1990. There are three levels of forest management:

- Basic level, according to the Forest Decree;
- Level of the criteria for sustainable forest management that shall be applied in public forests and in private forests larger than 5 hectares situated in the Flemish Ecological Network – these criteria can also be applied elsewhere on a voluntary basis;
- Level of the management vision ('beheervisie') for public forests, based on the Pro Silva 'close to nature' management principles - note that the management vision has no legally binding status, but is applied in the forests owned by the Flemish government (13% of the forest area) and is recommended (encouraged) in all other public forests (e.g. for forests owned by municipalities,

provinces, etc.- 17% of the forest area). All public forests (about 50.000 hectares) and about 30.000 hectares of private forests in Flanders are covered by management plans.

Terms and conditions for harvesting in the forest apply. These conditions are included in the Forest Decree regulations for recognition of companies harvesting in public forest ('Erkenningsregeling exploitanten'). This regulation is also applied by some forest owner groups ('bosgroepen'). All companies harvesting more than 50 m<sup>3</sup> per year need an official recognition by the forest administration, which includes requirements on training, safety at work, legal employment, payment of taxes, etc.

A harvesting permit is required, unless the harvesting operations are included in a management plan approved by the forest and nature administration.

Given the low forest cover in Flanders, the Flemish government has strict regulations for deforestation (conversion to non-forest land use). Three principles apply:

- Deforestation is prohibited, except in cases described in the Forest Decree.
- If deforestation is not prohibited, an urbanism permit is required.
- An urbanism permit for deforestation or an allotment permit for forested land can only be granted if approved compensation measures are in place.

In Belgium By 2020, the share of wood fuel in the volume of wood removal constituted 17,13 % (4)

#### Forest management in Wallonia:

The permission of the forest owner is required for all harvesting operations. A harvesting permit is required for all public forests.

All public forests (200.000+ hectares) contiguously larger than 20 hectares have a management plan (mandatory). Management plans are not required (optional) for small private forests.

For the whole of Belgium, the area of forests covered by a management plan amounts to about 360.000 hectares.

By the beginning of 2023, In the whole of Belgium, about 6 % (42.405 hectares) of its forests are FSC certified and 44 % (306.565 hectares) of its forests are PEFC certified.

#### **Socio economic setting (5, 6)**

Agriculture, Forestry & Fishing data was reported at 8,906.100 EUR millions in 2021. This records an increase from the previous number of 7,743.100 EUR millions for 2020.

Forestry & Logging data was reported at 718.000 Person in 2021. This records an increase from the previous number of 694.000 Person for 2020



## **Nature conservation (1, 3)**

In Belgium, the European Natura 2000 network covers 221,000 ha in Wallonia and 136,000 ha in Flanders, i.e. a total of 384,500 ha or 13% of the national territory.

Integral or managed reserves are scattered across the country. In the Walloon Region, these reserves cover approximately 10,000 ha.

In Flanders the following protection categories are in place: Natura2000, Biological Hotspots map (Biologische Waarderings Kaart), Speciale Beschermings Zone's (SBZ), European Bird and Habitat regulation (called VEN in Flanders), natural parks (Parcs Naturels), nature reserves, forest reserves, and one national park (de 'Hoge Kempen'). In Flanders the Spatial Structure Plan for Flanders (1997) contains 125.000 hectares (9,2 % of the total surface area of Flanders) for the Flemish Ecological Network (called VEN), consisting of Large Units of Nature and Large Units of Nature in Development. Furthermore, nature interweaving areas ('Natuurverwevingsgebieden') are designated, in which the ecological function shall sustainably be combined with agriculture, forestry and recreation. These areas shall be connected by the provinces in their spatial structure plans. Forests could also be protected because of special regulations about the protection of historical real estates (castles, etc.). Besides this forests can be protected as buffer zones around other protected areas.

More recently (2016) a new methodology is developed to score the ecological value of forests which is applied to forests that are outside the permanent forest estate (forests on land that is currently not classified as forest as a land-use category). These new actions are based on the new article 90ter of the official "Bosdecreet". This scoring system looks at 5 different criteria: size, history, ecological value (existing map), desired nature & forest types (GNBS) and location related to value forests (so called INBO-map). As a result of this 'scoring' an online map with around 12.500 ha of 'most vulnerable and valuable forests' has been prepared by the Flemish government (Meest Kwetsbare Waardevolle Bossen (MKWB)). These are lands where HCVs can occur. The Flemish government has already taken the decision to increase the level of protection for those forests against permanent deforestation, and both the map as the system have been rolled out in 2017. Together with the map a compensation system has been agreed upon to compensate landowners for the potential loss of value of such lands. With these additional legislation and compensation measures harvesting of such forest could only be allowed after special approval of the Flemish parliament.

In Wallonia the following protection categories are in place: Natura 2000, European Bird and Habitat regulation, protected natural sites (public nature reserves, recognized nature reserves, and forest reserves) and ancient forests.

In the Brussels capital region Natura2000 and Speciale Beschermings Zone's (SBZ) can be found.

In Belgium there are no forest ecosystems that are classified as a Global 200 Ecoregion. There are 9 Priority forest habitats recognised under the EU Habitats Directive. There are 9 RAMSAR sites designated (all wetlands).

### Nature 2000

New Nature 2000 sites in Flanders are proposed by INBO (Institute of Nature and Forest Research). They select and propose areas based on the EU Birds & the EU Habitats Directive. If sites are selected because of birds or habitats they will be called Speciale Beschermings Zone's (SBZ). This means that all such SBZ sites are also Nature 2000 sites. The whole procedure is regulated throughout the "Natuurdecreet" law.

In Wallonia the idea is the same, but the selection of sites is done by 8 special committees, each in its own part of Wallonia. There is no separate law, work is done according to the EU laws. Sites are officially named 'Nature 2000' sites. In total 148 sites (out of 240) are covered by a decree of designation in 2016. Implementation of Nature 2000 in Belgium as a whole is well underway and in a similar state as compared to other EU countries (there is a 6 –year work program with detailed goals and targets).

### International agreements

Belgium signed 'The Convention on Biological Diversity' (CBD) in 1995 and the Royal Belgian Institute of Natural Sciences (RBINS) is responsible for its monitoring and reporting in Belgium. The CBD Strategic Plan for Biodiversity 2011-2020 is followed as a guideline for implementation.

During the European Summit of Gothenburg in 2001 Belgium committed itself also to "halting biodiversity decline'. Related to all this Belgium developed a National Biodiversity Strategy 2006-2016 and an update in 2014 where 15 strategic objectives and 78 operational objectives are specified that aim to reduce and prevent the causes of biodiversity loss in all regions of the country. The Strategy plan takes into account 31 signed (by Belgium) international agreements of which the CBD, Birds Directive, Habitats Directive, NATURA 2000, RAMSAR, Convention on the Conservation of Migratory Species of Wild Animals (CMS) and Cites are the most important for biodiversity.

Forests included in the Natura 2000 network cover 209.000 hectares (total for the three regions). In the Natura 2000 network, forest management activities are subject to specific conditions to protect species and habitats. The economic and social functions of Natura 2000 forests are not excluded, but the priority is the ecological function.

Note that in this framework important changes to legislation are underway in Flanders.

Forest reserves have been designated in all three regions, and are included in the Natura 2000 network. In Wallonia, about 100.000 hectares of public forests have as primary function the protection of vulnerable soils (e.g. on slopes) and water bodies. These forests are subject to particular protection measures. The remaining surface area (about 400.000 ha in Belgium) is 'multifunctional' forest according to the forest legislation. The surface area of 'permanent forest' amounts to about 600.000 hectares. This entails forests which lie in zones that are designated as forests in the regional spatial plans. These forests cannot be converted to non-forest land use, except for particular cases of 'public interest' that are subject to strict procedures.

The (regional) competent authorities are the Agency for Nature and Forests (Flanders) and the Department of Nature and Forests (Wallonia). The forest and nature administrations are involved in the approval of management plans, granting of harvesting permits, sales of wood from public forests, and field verification of harvesting operations.

Infringements, observed during inspection of the site of forest exploitation, during and/or shortly after the harvesting operations, are recorded as complaints or in official reports.

| Species                          | CITES (7)       | IUCN (8)           |
|----------------------------------|-----------------|--------------------|
| Birch ( <i>Betula</i> spp)       | Not on the list | Least concern (LC) |
| Beech ( <i>Fagus silvatica</i> ) | Not on the list | Least concern (LC) |

|  |                                      |
|--|--------------------------------------|
| Pine (Pinus Silvestris)                | Not on the list Least concern (LC)   |
| Spruce (Picea abies, Picea sitchensis) | Not on the list Least concern (LC)   |
| Oregon pine (Pseudotsuga menziesii)    | Not on the list Least concern (LC)   |
| Maple (Acer spp.)                      | Not on the list Least concern (LC)   |
| Larch (Larix decidua)                  | Not on the list Least concern (LC)   |
| Common ash (Fraxinus excelsior)        | Not on the list Near Threatened (NT) |

#### References:

- (1): <https://srfb.be/informations-sur-les-forets/les-forets-de-belgique/>
- (2): [https://www.cnc-nkc.be/sites/default/files/report/file/national\\_forest\\_accounting\\_plan\\_-\\_belgium.pdf](https://www.cnc-nkc.be/sites/default/files/report/file/national_forest_accounting_plan_-_belgium.pdf)
- (3): <https://connect.fsc.org/document-center/documents/760415a3-35bf-4dcf-9190-80076f71aac8>
- (4): <https://forest-data.unece.org/Countries/BE#5>
- (5) <https://www.ceicdata.com/en/belgium/esa-2010-gdp-output-and-intermediate-consumption-current-price/gdp-ic-agriculture-forestry--fishing>
- (6): <https://www.ceicdata.com/en/belgium/number-of-employees-by-region-and-industry/no-of-employees-nace-2008-forestry--logging>
- (7): <https://checklist.cites.org/#/en>
- (8): <https://www.iucnredlist.org/>
- (9): [https://www.belgium.be/fr/environnement/biodiversite\\_et\\_nature/conservation\\_de\\_la\\_nature/par\\_region/natura\\_2000/index.jsp](https://www.belgium.be/fr/environnement/biodiversite_et_nature/conservation_de_la_nature/par_region/natura_2000/index.jsp)

**Country:** France

**Area/Region:** All

**Exclusions:** No

In France, IBV have 10-25 suppliers of primary feedstock (low grade sawlogs), approximately 50% are PEFC certified; 5-10 suppliers of secondary feedstock, approximately 50% are PEFC certified and less than 10 suppliers of tertiary feedstock.

Forest cover

Since the second half of the 19th century, the metropolitan forest area of France has continuously increased. It has increased by more than 20% since 1985 and reach 17 million hectares (ha) in 2020, i.e. a coverage of 31% of the metropolitan territory (1, 2)

| Quantity          | Estimate (1,000 ha) | Share of total land area | Description   |
|-------------------|---------------------|--------------------------|---|
| Production forest | 16,112 ± 114        | 29%                      | Forest available for wood supply  |
| Other forests     | 964 ± 56            | 2%                       | Forest non available for wood supply (protection status, military area, inaccessibility)      |
| Forest land       | 17,076 ± 108        | 31%                      | Area >0.5 ha, min 20m wide, min. crown cover of 10%, min. height of trees 5m maturity in situ |
| Other land        | 37,867 ± 153        | 69%                      | All land that is not classified as forest land  |
| Total land area   | 54,944 ± 15         | 100%                     |   |

The mean growing-stock volume of the French forests is estimated at 2.8 billion cubic meters. This volume calculated by the National Forest Inventory (NFI) is the stem volume of live trees having a diameter at breast height superior to 7.5 cm, from the stump to a minimum 7 cm top diameter over bark.

The growing-stock volume per hectare is 174 m<sup>3</sup>.

The French forest is dominated by broadleaved species (64% of the growing-stock volume and more than 2/3 of the total forest area). Broadleaved trees are mostly located in flat and low-elevation areas, except the Landes of Gascogne region in South-Western France, which is dominated by maritime pine, whereas the coniferous are in mountainous and Mediterranean areas. Oak species account for more than 25% of the total growing-stock volume, beech for 10%, Norway spruce for 7% and silver fir for 8% (2)

The most common wood species are (2)

Hardwood:

- oak, 28 %
- beech, 10 %
- chestnut, 5 %
- common ash, 4 %
- hornbeam, 4 %
- others, 13 %

Softwood:

- spruce, 7 %
- fir, 8 %
- pine, 11 %
- douglas, 5 %

- others, 5 %

### Ownership (3)

Three quarters of the French forests are in private ownership, 16 % are owned by cities and local authority districts and roughly 9 % are state forests.

### Management (4)

Pursuant to the law on the future of agriculture, food and forestry (LAAAF), the National Forestry and Timber Program (PNFB) 2016-2026 sets out the main lines of the forestry policy conducted in France, with the following objectives:

- increase wood harvesting in France while ensuring the renewal of the forest;
- meet the expectations of citizens vis-à-vis the forest and raise their awareness of its challenges (the PNFB is available in each region in a regional forest and wood program);
- preparing forests for climate change and mitigating its effects;
- create markets for forest products and adapt its management to market needs.

To achieve these objectives, the PNFB plans to initiate major changes in the forest. The PNFB wishes, for example, to better regulate game populations that prevents young trees from developing (consultation between hunters and foresters will be encouraged). This program also focuses on reducing the uncertainties associated with climate change (through experimentation, research and the dissemination of results to forest owners). It is also a question of revitalizing the management of the forest by encouraging the grouping of owners and by developing the digital tools which allow them to access economic and cartographic data.

Finally, the PNFB wants to improve the competitiveness and attractiveness of the sector by modernizing tools and manufacturing processes through innovation.

The forest-wood sector is intended to participate fully in the reduction of GHGs, in accordance with the commitments of the Paris agreement. This objective requires increasing the productivity of the timber industry and adapting forest and silvicultural practices to climate change.

The year 2019 was marked in France by episodes of very intense heat and drought which affected the health of the forests (9). Several articles reflected in 2018 that the French forests were underexploited, however, the drought in 2019 may have changed this picture severely.

About 33% of French forests are PEFC certified, whereas FSC certified forests only constitute about 1% (6, 7))

By 2020, the share of wood fuel in the volume of wood removal constituted 49,15% (10)

#### Socio economic setting

The forest-wood sector generates some 440,000 jobs and contributes to the dynamism of the territories (4)

The share of value added by the agriculture, forestry and fishing sector to the gross domestic product in France increased by 0.1 percentage points in 2021 in comparison to the previous year. In total, the share amounted to 1.64 percent in 2021. Over the observed period, the share has been subject to fluctuation (8).

#### Nature conservation (11)

To create its national network of Nature 2000 sites, France has chosen a local approach based on consultation with the various stakeholders (farmers, fishermen, hunters, private foresters, etc.). These consultations make it possible to define the management objectives as well as the actions to be undertaken in response to the ecological challenges and pressures observed.

In the late 1990s, the network of sites on land began to be set up on the basis of scientific inventories and the Natura 2000 network was finally expanded on a large scale in the early 2000s.

In 2006, while the terrestrial network was being put in place, France set about building the marine network, this time in consultation with new stakeholders, the users of the sea.

By 2022, with 1,756 sites, including 221 marine and mixed sites, representing 13% of the territory of Metropolitan France and more than 13,000 municipalities concerned, the French network is considered satisfactory for ensuring the preservation of the targeted species and habitats.

In relation to protection, FSC's controlled wood risk assessment for France, consider low risk for all five controlled wood categories (12)

| Species   | CITES           | IUCN               |
|---|-----------------|--------------------|
| Birch ( <i>Betula</i> spp)                              | Not on the list | Least concern (LC) |
| Beech ( <i>Fagus silvatica</i> )                        | Not on the list | Least concern (LC) |
| Pine ( <i>Pinus Silvestris</i> )                        | Not on the list | Least concern (LC) |
| Spruce ( <i>Picea abies</i> , <i>Picea sitchensis</i> ) | Not on the list | Least concern (LC) |
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|                                 |                                      |
|---------------------------------|--------------------------------------|
| Maple (Acer spp.)               | Not on the list Least concern (LC)   |
| Larch (Larix decidua)           | Not on the list Least concern (LC)   |
| Common ash (Fraxinus excelsior) | Not on the list Near Threatened (NT) |

IBV list of species sourced from France with protection status listed below:

#### References:

- (1) <https://agriculture.gouv.fr/tout-savoir-sur-les-forets-francaises>
- (2) <https://inventaire-forestier.ign.fr/spip.php?rubrique86>
- (3) <https://agriculture.gouv.fr/infographie-la-foret-francaise>
- (4) <https://www.vie-publique.fr/en-bref/279181-forets-et-filiere-bois-en-france-le-programme-national-2016-2026>
- (5) <https://connect.fsc.org/impact/facts-figures>
- (6) <https://pefc.org/discover-pefc/facts-and-figures>
- (7) <https://www.the-forest-time.com/en/the-forest-economy-in-france>
- (8) <https://www.statista.com/statistics/1107173/share-of-agriculture-in-french-gdp/>
- (9) <https://www.vie-publique.fr/en-bref/273283-canicule-secheresse-parasites-la-foret-francaise-souffert-en-2019>
- (10) <https://forest-data.unece.org/Countries/FR>
- (11) <https://www.ofb.gouv.fr/en/actualites/natura-2000-network-celebrates-its-30th-anniversary>
- (12) [https://connect.fsc.org/document-centre?dspace\\_doc\\_type=7&search=](https://connect.fsc.org/document-centre?dspace_doc_type=7&search=)
- (13): <https://www.natura2000.fr/>

**Country:** Germany

**Area/Region:** All

**Exclusions:** No

In Germany, IBV have 100-200 suppliers of primary feedstock (low grade sawlogs), approximately 50% are PEFC certified; 50-100 suppliers of secondary feedstock, approximately 50% are PEFC certified and less than 10 suppliers of tertiary feedstock.

## Forest cover (1,2)

According to the National Forest Inventory (2012) the forest in Germany covers 11.4 million hectares equivalent to 32 % of the total land area of the country. The forest distribution in Germany is quite diverse. The percentage of land covered with forest are low on North German plains due to agricultural activity, and the Southern low mountain ranges are particularly rich in forests. The percentage of deciduous trees is steadily increasing (Period 2002-2012). Four species dominate in the forests of Germany:

- Spruce, covering approx. 2.8 mill ha's (25 % of the forest area).
- Pine covers approx. 2.4 mill ha's (22 % of the forest area).
- Beech covers approx. 1.7 mill ha's (15 % of the forest area).
- Oak covers approx. 1.1 mill ha's (10 % of the forest area).

## Management (3)

Almost all forests in Germany are influenced by humans ("semi-natural"). But structural diversity and naturalness have increased through active forest management. Almost natural or semi-natural tree species composition covers 36% of the forest area (51% in the young forest stands, i.e. trees up to four metres high). Introduced tree species cover 5 % of the forest area. The most common introduced species are Douglas fir (2 %), Japanese larch (0.8 %) and red oak (0.5 %)

Overall mixed stands cover 78% of the forest area and multiple-storied forest stands cover 68% of the forest area. Furthermore natural rejuvenation is used on 85% of the forest area.

Both total standing timber volume and the total forest cover is increasing in Germany. Annual increment in German forests is in average 11.2 m<sup>3</sup> per ha and year. In total 121.6 mill m<sup>3</sup> per year. Annual harvest represents 62.5 % of annual increment corresponding to an average of 7 m<sup>3</sup> per ha and year. In total 76 mill m<sup>3</sup> raw timber per year.

By 2023 about 13 % of the forests in Germany are FSC certified and 75 % are PEFC certified.

## Development in fuelwood assortment (4)

Total harvest in Germany in 2020 is estimated at 84,051 mio. m<sup>3</sup>, hereof biomass is estimated at 26%

## Ownership (5)

In contrast to many other countries of the world, the forest in Germany belongs for the most part to the citizens and the cities and municipalities, which have a constitutionally protected right of disposition. In Germany, forest ownership has not only material, but above all also high idealistic value.

Many forests have been in the hands of family and private forestland owners and entities, such as churches, for generations.

Owners with fewer than 20 hectares hold about half of the privately owned forest area. Approx. 13 percent of private forestland belongs to owners with more than 1,000 hectares. Owing to the large number of



owners with very small areas of woodland, the average size of privately owned forest property in Germany is 2.5 hectares.

For the owners of small forests, forestry cooperatives play a significant role to ensure their self-determined forest management. Forestry cooperatives enable them to generate profits from their property in despite fragmented ownership structures. In Germany, there are currently around 3,500 forestry cooperatives with approx. 430,000 members. They manage a total of over 3.5 million hectares of forestland.

## Management practices (5, 6)

### National forest policy

Germany's Forest policies define the framework and rules related to management of forests and timber utilisation. The main forestry regulations at Federal level can be found in the Federal Forest Act. One of the Federal Government's political guidelines is the Forest Strategy 2020. Its aim is to develop an adapted, lasting balance between increasing timber demands on one hand and sustainability on the other hand. The implementation of the Forest Strategy 2020 focus on the following thematic areas:

- Climate change mitigation and climate adaption
- Promotional programmes for small and micro private forest owners to ensure operational objectives within the framework of existing legal forest regulations.
- Promotion of timber as technically and ecologically excellent renewable resource

Another focus area in the German National Forest Policy is to improve forest biological diversity through the following approaches:

- Integrated forest management
- Intensifying the dialogue between forest owners, forestry and nature conservation
- Taking the dynamics of forest ecosystems and unique local features into account
- Balancing the interests of the general public and forest owners
- Creating incentives for nature conservation
- Linking biotope to allow animal and plant species to move from one region to another
- Strengthening environmental protection to counter global and large-area environmental changes
- Implementing biodiversity objectives in federal forest areas
- The core disciplines of German silviculture are
- Maintaining forest area
- Increasing the stability, productivity and diversity of the forests
- Adaption to climate change
- Preserving forest genetic resources
- Strictly limited use of chemical plant protection.

Protection of soil and water resources is another important focus area of the German National Forest Policy. Research and education are also emphasised, and the Federal government promotes research through a wide range of funding programmes targeted at national and international level.

### Socio economic setting

Germany is a densely populated country. Over 80 mill people live on 35.7 mill ha's. For centuries people have inhabited and cultivated Germany intensively. 13 % of the national area is used for settlements and transportation. 52 % of the area is used for agriculture, making it the largest land use form in Germany

followed by forests or forestry with 32 %. In recent decades, there has been an increasing competition between different types of land use, like production of timber for consumption and nature conservation and recreation.

In communal forests 96 % of all income is generated by sale of timber. In private forests this figure is as high as 98 %. The socially desired protective and recreational functions of forests in Germany are financed almost entirely from this income. In the state forest of the Länder the additional costs and diminished proceeds are largely compensated by subsidies from the state budgets (up to 150 EUR/ha's). In the case of private and municipal forest holdings public support has so far been comparatively low in this area (4 EUR and 9 EUR respectively).

#### Economy of the forest sector (5)

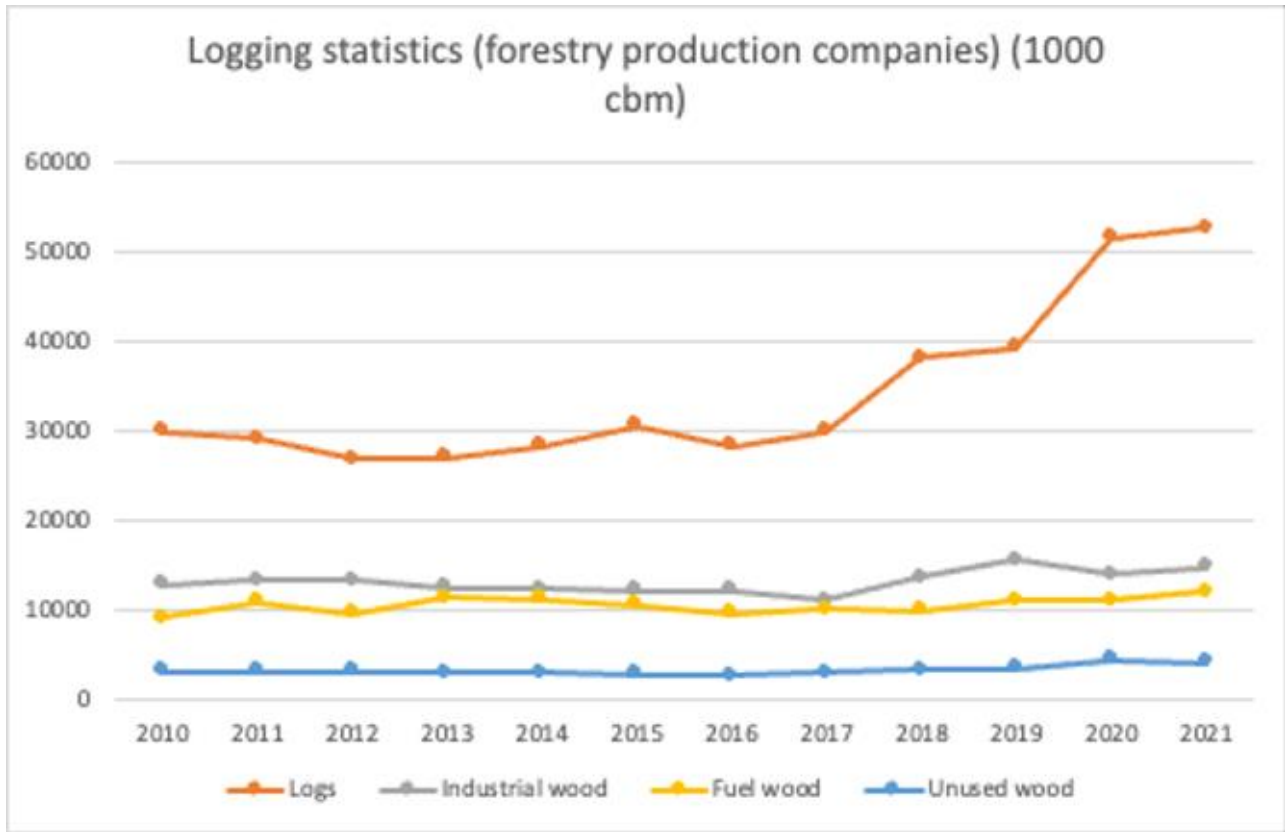
In terms of turnover and employment, the timber and forestry sector represents one of the leading sectors of Germany's economy. It employs roughly 750,000 people, includes more than 100,000 companies and generates an annual turnover of approx. EUR 130 billion. Domestic forestry is the most important source of raw materials for the downstream branches of the timber industry.

Rising temperature and drought, strongly increased harvest of logs, fuelwood stable or small increase in harvest.

Rising temperatures and persistent drought are increasingly affecting the forests in Germany. This not only favors the outbreak of forest fires, but also the spread of pests such as the bark beetle. In 2021, almost 41.1 million cubic meters of damaged wood were felled due to insect damage. As reported by the Federal Statistical Office (Destatis), this corresponds to 81.4% of the felling caused by forest damage - a new record value. The proportion has more than quadrupled in the past ten years: In 2011, insect damage was still responsible for 18.4% of the damaged wood felled. Infestation by pests is now the main reason for the felling of damaged wood in German forests. Other causes of felling that are ultimately decisive for the death of the trees, such as drought (7.9%) and wind or storm (4.6%), played only a minor role in 2021.

Coniferous trees such as spruce, fir or pine are particularly affected by insect infestation: in 2021, these tree species accounted for almost all of the insect-related damaged wood felling, at 99.3%. This corresponds to around 40.8 million cubic meters of damaged wood. One reason for this is the rapid spread of the bark beetle in the local forests. This primarily affects spruces, which are also often planted in monocultures.

As can be seen from the figure below, the harvest of logs has increased significantly, but it can also be seen that fuel wood has a stable or small increasing tendency in 2020 and 2021.



Conservation CITES or IUCN species (6, 7, 8)

According to current estimates around two-thirds of German forest area are listed in at least one protected area category according to the Federal Natural Conservation Act, the Land Forest Act, the European FFH directive and the Bird Protection Directive (Natura 2000). Most of them are landscape conservation areas. Their main purpose is to protect the landscape and preserve biodiversity. In nature parks they are also used for recreation and sustainable regional development. Whereas forest management is scarcely subject to any constraints, for example in landscape conservation areas, nature conservation goals in other areas have priority or are - in the case of core areas in national parks and biosphere reserves - oriented towards nature conservation in particular. Depending on the conservation goal there may be more or fewer management constraints.

Furthermore, in recent years a total of approximately 100,000 hectares of government-owned areas have been handed over to countries and to nature conservation associations and foundations as National Natural Heritage. A further 25,000 hectares are to follow suit. Two-thirds of the natural heritage areas are forests. According to estimates approximately 2% of the forest area is no longer managed (for instance core areas of national parks and biosphere reserves, natural forest areas, areas owned by nature conservation associations and authorities as well as permanently non-used areas). Exact details about this are currently being put together in a research project of the Federal Ministry of the Environment.

In German forestry there are many synergies with nature conservation particularly when the principles of close to nature forest management are upheld in the maintenance and development of forests as a habitat for animals and plants. Moreover, forest owners and foresters see themselves as nature conservationists in forests. On the regional level they cooperate successfully in many areas with nature conservation institutions.

IBV list of species sourced from Germany with protection status listed below:

| Species   | CITES           | IUCN                 |
|---|-----------------|----------------------|
| Birch ( <i>Betula</i> spp)                              | Not on the list | Least concern (LC)   |
| Beech ( <i>Fagus silvatica</i> )                        | Not on the list | Least concern (LC)   |
| Pine ( <i>Pinus Silvestris</i> )                        | Not on the list | Least concern (LC)   |
| Spruce ( <i>Picea abies</i> , <i>Picea sitchensis</i> ) | Not on the list | Least concern (LC)   |
| Oregon pine ( <i>Pseudotsuga menziesii</i> )            | Not on the list | Least concern (LC)   |
| Maple ( <i>Acer</i> spp.)                               | Not on the list | Least concern (LC)   |
| Larch ( <i>Larix decidua</i> )                          | Not on the list | Least concern (LC)   |
| Common ash ( <i>Fraxinus excelsior</i> )                | Not on the list | Near Threatened (NT) |

#### References:

- (1) <https://www.bundeswaldinventur.de/en/third-national-forest-inventory/surveying-the-forest/>
- (2) <https://www.bundeswaldinventur.de/en/third-national-forest-inventory/the-forest-habitat-more-biological-diversity-in-the-forests/spruce-pine-beech-oak-the-most-common-tree-species>
- (3) [https://www.bundeswaldinventur.de/fileadmin/SITE\\_MASTER/content/Downloads/BMEL\\_The\\_Forests\\_in\\_Germany.pdf](https://www.bundeswaldinventur.de/fileadmin/SITE_MASTER/content/Downloads/BMEL_The_Forests_in_Germany.pdf)
- (4) <https://forest-data.unece.org/Countries/DE>
- (5) <https://www.bmel.de/SharedDocs/Downloads/EN/Publications/german-forests.html>
- (6) <https://www.bmel.de/SharedDocs/Downloads/EN/Publications/ForestStrategy2020.html>
- (7) <https://www.iucnredlist.org/>
- (8) <https://checklist.cites.org/#/en>
- (9): [https://www.bfn.de/0316\\_natura2000.html](https://www.bfn.de/0316_natura2000.html)

**Country:**Netherlands

**Area/Region:** All



App 60% of the forest area is under public ownership, 7,8% is set aside as natural monuments, 11,6% is owned by nature protection organizations, and app 20,7% of the forest area is under different forms of private ownership.

## **Management practices**

From G.M.J. Mohren & F. Vodde: Forests and Forestry in The Netherlands

“During the seventies of the previous century, throughout Europe there was an increase in other forest functions besides timber production. The forestry profession reacted with the development of the concept of multiple-use forestry, where several forest functions were explicitly considered, usually with timber production as the leading principle. As a result, forest planning very much remained firmly based on cutting regimes and rotational planning. Yet, with the growing emphasis on nature conservation objectives in forestry (e.g. Al, 1995) also some specific silvicultural methods to enhance natural values in forest were developed. Some of these so-called nature technical forest management practices (Londo, 1991) consists of the killing of trees by removing of a strip of bark or by pulling them over, or the use of large herbivores. The so-called mosaic method (Koop & Siebel, 1993) was used to accelerate the conversion of mono-species, even-aged forests into uneven-aged, mixed forests. Changing political (more attention to nature conservation and recreation) and economical (lower timber prices, less subsidies) conditions paved the way for more attention towards close-to-nature forestry, partly inspired by the nature-oriented forestry as had been practiced for centuries by central European foresters. As a result a new silvicultural approach, called Integrated Forest Management (IFM, Dutch: geïntegreerd bosbeheer), was developed around 1990. In IFM several forest functions are pursued in an integrated (combined) manner, although the main compromise is found in a small-scale trade-off between timber production and nature conservation. With IFM, the use of natural processes is stimulated. Keywords are natural regeneration, native timber species, mixed, uneven-aged stands, small-scale or selective cuttings, presence of dead wood, large stems, no use of biocides. At present, IFM is stimulated throughout the country, actively supported by instruction material (courses, handbooks) and professional demonstrations. The introduction of Integrated Forest Management in the Netherlands coincides with the development of ecosystem management at landscape scale, in which forest and other nature areas are considered together, and in which traditional planning methods based on sustained yield are not of overriding importance anymore. By making all relevant forest functions explicit, this allows the involvement of a wide range of stakeholders, beyond the traditional forest owner and forest manager. It also provides for application of certification systems, and the communication of management objectives to a wide variety of forest users. Inevitably, forest planning becomes more complex as a consequence.”

## **National forest policy**

- The Netherlands Forest Strategy for 2030 lists for follow objective for the Dutch forest management:
- 3.400 hectares compensation deforestation through nature transformation N2000 1
- 5.000 hectares forest expansion within Nature Network Netherlands
- Improvement of connection of forests
- Creating climate proof forest
- Stimulating more natural forest, climate proof forest, high forest-biodiversity

- Decreasing recreational pressure
- Use of wood
- Implementing communication, involvement and participation

### **Socio economic setting**

The economy of the Netherlands is the 15<sup>th</sup> largest in the world and highly developed and diverse. Industrial activity is predominantly in food processing, chemicals, petroleum refining, high-tech, financial services, the creative sector and electrical machinery. The Netherlands also has the 15th highest per capita gross domestic product in the world.

Employment in the Dutch primary forest sector was app. 2100 Full-time equivalents in 2015.

### **Economy of the forest sector**

The total harvest of wood in the Netherlands fluctuates significantly, but averages around 350.000 m<sup>3</sup> stading stock per year. The Gross Value Added for forestry and logging in the Netherlands was 169 mill EUR in 2020, less than 0,0% of the total GDP of 800 bill EUR.

### **Conservation CITES or IUCN species**

The Netherlands has ratified the CITES convention in 1984. All wood species utilized by IBV are listed as IUCN redlist category "Least Concern".

IBV list of species sourced from the Netherlands with protection status listed below:

|   |                                    |
|---|------------------------------------|
| Birch ( <i>Betula</i> spp)                              | Not on the list Least concern (LC) |
| Beech ( <i>Fagus silvatica</i> )                        | Not on the list Least concern (LC) |
| Pine ( <i>Pinus Silvestris</i> )                        | Not on the list Least concern (LC) |
| Spruce ( <i>Picea abies</i> , <i>Picea sitchensis</i> ) | Not on the list Least concern (LC) |
| Oregon pine ( <i>Pseudotsuga menziesii</i> )            | Not on the list Least concern (LC) |
| Maple ( <i>Acer</i> spp.)                               | Not on the list Least concern (LC) |
| Larch ( <i>Larix decidua</i> )                          | Not on the list Least concern (LC) |

Common ash (*Fraxinus excelsior*) Not on the list Near Threatened (NT)

### Natura 2000

The Netherlands has designated a total of 162 Natura 2000 habitat protection and bird protection areas.



Sources:

(1) Economy of the Netherlands - Wikipedia



(2) (PDF) Forests and Forestry in the Netherlands (researchgate.net)

(3) [https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Forests,\\_forestry\\_and\\_logging](https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Forests,_forestry_and_logging)

(4): <https://www.natura2000.nl/pages/homepage.aspx>

**Country:** Luxembourg

**Area/Region:** All

**Exclusions:** No

In Luxembourg, IBV have 10-25 suppliers of primary feedstock (low grade sawlogs), approximately 50% are PEFC certified; 5-10 suppliers of secondary feedstock, approximately 50% are PEFC certified and less than 10 suppliers of tertiary feedstock.

### **Forest cover (1,2)**

The area of forested land in Luxembourg measures app. 88,700 ha, which represents 35% of the national territory. By nature, Luxembourg would be covered by a forest dominated by beech. The silviculture of the last centuries has led to the forest as it appears today, namely 68 % of Luxembourg's forest is deciduous stands and about a third (32%) is softwood stands made up of the following species: spruce (19%), Douglas fir (3%), pines (1%), larch and other softwoods (0.5%), mixed stands dominated by one or more resinous (8%).

The Grand Duchy's strong stem timber volume resources reach just over 28 million m<sup>3</sup> , which represents for the stands an average value per hectare of 337 m<sup>3</sup> .

### **Management (3)**

Nearly all of Luxembourg's forest are managed forest, and the country reports 0% primary forest. 68% of the forest area is reported as other naturally regenerated forest, while 33% are planted forests.

The public forest is dominated by beech and oak (70%) while in the forest private, these two species represent only 43%. The main coniferous species (spruce and douglas fir) dominate with 33% in private forests, while softwood species represent only 10% in public forests. This large proportion of conifers in private forests is explained by the fact that softwoods have superior growth and therefore greater profitability. This has often lead to planting of spruce stands on unsuitable sites.

Of the app. 88,700 ha of forest in Luxembourg, 37.987 ha are PEFC certified (42,8%)

## Development in fuelwood assortment (4)

|            |                                     | TIME | 2016 | 2017   | 2018     | 2019   | 2020  | 2021   |
|------------|-------------------------------------|------|------|--------|----------|--------|-------|--------|
| Luxembourg | Roundwood (wood in the rough)       |      | 382  | 367.76 | e 447.9  | 384.88 | 349.7 | 281.34 |
| Luxembourg | Fuelwood (including wood for charco |      |      |        |          |        |       |        |
| Luxembourg | Industrial roundwood                |      | 306  | 297.93 | e 363.38 | 319.7  | 290.7 | 235.59 |
| Luxembourg | Sawlogs and veneer logs             |      |      |        |          |        |       |        |
| Luxembourg | Pulpwood, round and split           |      | 187  | 117.66 | 127.04   | 119.72 | 103.7 | 83.84  |
| Luxembourg | Other industrial roundwood          |      |      |        |          |        |       |        |

## Ownership

More than half of the forests are privately owned (54%), compare to 46% of public forest ownership, which is very close to the average observed in within the European Union.

## Management practices

Adapted from emwlet.lu – La sylviculture au Luxembourg:

Two hundred and fifty years ago, that is to say during the industrial revolution, the Luxembourg forest was overexploited. All steam engines ran on wood. It was not until the middle of the 19th century, with the introduction of other fuels, that the excessive exploitation of our forests ceased. It was at this time that the concept of sustainable forest management was developed.

Nowadays, sustainable forest management is at the center of all discussions concerning forestry in Luxembourg. For management to be sustainable, the quantity of resource exploited must be less than the quantity of resource generated and all functions of the forest are ensured.

Since the 20th century, the extraction of wood in Luxembourg has been less than its increase. Currently, it corresponds to approximately sixty percent of the increase. This trend has had the result, among other things, of producing trees of low unit volume and therefore of low economic value. Two-thirds of national production is made up of hardwood, softwoods make up the remaining third.

The forest roads and the skidding routes intended for the evacuation of wood and visitors to the forest are planned in such a way as to protect the soil while allowing the fauna and flora to develop naturally. Municipalities can regulate the use of rural roads

## National forest policy

In early 2014, the government initiated a process to revise forest sector laws and regulations with the aim of developing a new forest code. This project aims to modernize some of the very old legal provisions to meet the new challenges faced by all actors in the forest sector. Initial consultations were held with members of the National Forest Programme (NFP), represented by industry stakeholders. The draft bill was tabled by the government in January 2018. The bill is parliamentary number 7255.

## Socio economic setting

The economy of Luxembourg is largely dependent on the banking, steel, and industrial sectors. Luxembourg has the highest per capita gross domestic product in the world.

## Economy of the forest sector

The total annual harvest of wood in Luxembourg fluctuates significantly, but was app. 281.000 m<sup>3</sup> in 2021, of which 236.000m<sup>3</sup> was industrial roundwood and 46.000m<sup>3</sup> was fuelwood. The gross value added from forestry and logging was 8 mill EUR in 2020. For comparison, the GDP of the highly developed economy of Luxembourg was app 57,7 bill EUR in 2020.

## Conservation CITES or IUCN species

Luxembourg has ratified the CITES convention in 1983. All wood species utilized by IBV are listed as IUCN redlist category "Least Concern".

IBV list of species sourced from Luxembourg with protection status listed below:

| Species                                | CITES           | IUCN               |
|--|-----------------|--------------------|
| Birch (Betula spp)                     | Not on the list | Least concern (LC) |
| Beech (Fagus silvatica)                | Not on the list | Least concern (LC) |
| Pine (Pinus Silvestris)                | Not on the list | Least concern (LC) |
| Spruce (Picea abies, Picea sitchensis) | Not on the list | Least concern (LC) |
| Oregon pine (Pseudotsuga menziesii)    | Not on the list | Least concern (LC) |
| Maple (Acer spp.)                      | Not on the list |                    |

Larch (*Larix decidua*) Not on the list Least concern (LC)

Common ash (*Fraxinus excelsior*) Not on the list Near Threatened (NT)

### **Natura 2000**

Luxembourg has designated 46 habitat protection areas (total 41.430 ha) and 18 Bird Protection areas (total 41.893 ha).

#### *Sources:*

(1) [forets-sylviculture-au-luxembourg.pdf](#) (public.lu)

(2) Natura 2000 areas in the Grand Duchy of Luxembourg - Natur - Portail de Environment - [emwelt.lu](#) - Luxembourg (public.lu)

(3): [https://environnement.public.lu/fr/natur/biodiversite/mesure\\_3\\_zones\\_especes\\_proteges.html](https://environnement.public.lu/fr/natur/biodiversite/mesure_3_zones_especes_proteges.html)

**Country:**Norway

**Area/Region:** All

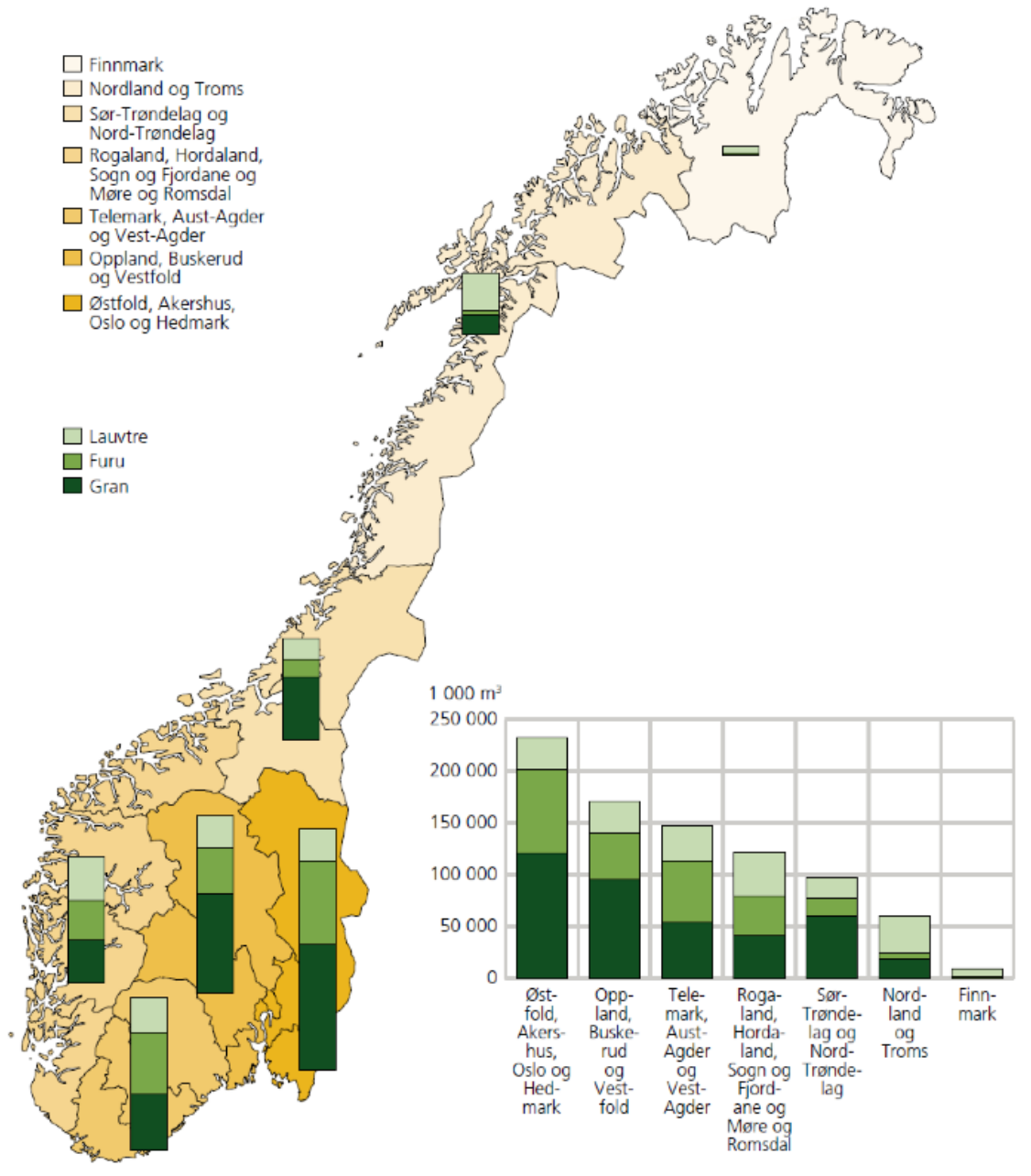
**Exclusions:** No

In Norway, IBV have 0-5 suppliers of primary feedstock (low grade sawlogs), approximately 50% are PEFC certified; 0-5 suppliers of secondary feedstock, approximately 50% are PEFC certified and less than 10 suppliers of tertiary feedstock.

#### Forest cover

In Norway 37,4 % of the land area is covered by forest. The total forested area amounts to 12,1 million hectares, including 8,3 million hectares of productive forest. The annual increment is about 24,1 million cubic metres and the most important species are Norway spruce (44 %), Scots pine (31 %) and birch and other broadleaves (25 %)(1)

Figur 3.1.4. Stående kubikkmasse under bork fordelt etter treslag og takserte regionar. 2011-2015. 1 000 m<sup>3</sup>



Kjelde: Norsk institutt for bioøkonomi, Landsskogtakseringa.

Forest regions and main species in Norway: Gran = *Picea* spp; Furu = *Pinus sylvestris*; Lauvtre = broadleaves. As can be seen from the figure above, the majority of the standing volume is located in the South/Southeastern part of Norway.

In terms of standing volume in the Norwegian forests, this has increased with 12,5% since 2010, se figure below.



Skogvolum  
2020

**988** millioner m<sup>3</sup>

↑ 12,5 % Endring fra ti år før

Skogvolum

1 000 m<sup>3</sup>

1 100 000

1 000 000

900 000

800 000

700 000

600 000

500 000

400 000

300 000

200 000

100 000

0



● Gran ● Furu ● Lauv

↓ Last ned som ...

Kilde:

[Landsskogtakseringen, Statistisk sentralbyrå](#)

## Management

The government of Norway have had the following policy up until September 2021, where a new policy is under development.

Forest policy must facilitate sustainable resource management, where logging does not exceed growth, and where other important tasks of the forest are taken into account - as a habitat for plants and animals, a recreational arena for humans, and as a storage and drain for carbon.

Norwegian forest owners have long and good traditions for sustainable management of forest resources. When forests are felled in Norway, forest owners are required to make arrangements for new forests to grow - either by planting or letting seed trees provide natural regrowth. Norway was the first in the world to map the relationship between logging and growth - all in 1919. By 2023 about 6% of the forests in Norway are FSC certified and about 60% are PEFC certified.

One central issues which politicians are discussing internally and with EU by September 2021 is if clear fellings will be phased out(2)

Stakeholders, like Naturvernforbundet, Natur og Ungdom, Sabima and WWF wrote to the government in May 2021 about desired changes for forest management. The following issues were raised (3)

- 10% protection of productive forest.
- Annual Norwegian forest protection billion
- Introduce nature laws to ensure the protection of outdoor areas.
- Equally balance environment and industry in the Forest Act
- Map forests that have not previously been clear felled and map biodiversity.
- Independent mapping of environmental values in forests.
- Restoration of at least 15% of degraded forest area.
- Multi-age forestry must to a far greater extent take over for forestry based on barren areas and spruce plantations.
- The obligation to report all felling must be introduced
- Eliminate or convert environmentally hostile subsidies in forestry.
- Prohibit use of exotic species
- Remove the return requirement for State forest.
- Forest measures that are positive for both forest and the environment must be given priority.

#### Development in the fuelwood sortiment

In 2015 the fuelwood use intensity in Norway was estimated at 0,21 cubic meters per hectare of forest compared to 0,62 cubic metre per hectare of forest as the average for the European Union, see figure below. By 2021 the Norwegian government has a strong commitment in the reduction of its usage of fossil fuels and therefore have a strong focus on bioenergy which also includes fuelwood. It is therefore estimated that Norway has a higher fuelwood usage in 2021 compared to 2015, however not higher than the European Union average, as no references indicate essential changes by March 2023.

**Table 2** Fuelwood production per capita and fuelwood intensity index

| Fuelwood production per capita, 2015 |                |                         | Fuelwood production intensity index, 2015 |                |                                     |
|--------------------------------------|----------------|-------------------------|---|----------------|-------------------------------------|
| Rank                                 | country        | cubic meters per capita | Rank                                      | country        | cubic meters per hectare of forests |
| 1                                    | Estonia        | 1.84                    | 1   | Denmark        | 3.24                                |
| 2                                    | Finland        | 1.42                    | 2   | France         | 1.60                                |
| 3                                    | Lithuania      | 0.80                    | 3   | Hungary        | 1.39                                |
| 4                                    | Sweden         | 0.62                    | 4   | Switzerland    | 1.33                                |
| 5                                    | Latvia         | 0.61                    | 5   | Austria        | 1.28                                |
| 6                                    | Austria        | 0.59                    | 6   | Lithuania      | 1.12                                |
| 7                                    | Slovenia       | 0.55                    | 7   | Estonia        | 1.09                                |
| 8                                    | Norway         | 0.52                    | 8   | Germany        | 0.98                                |
| 9                                    | France         | 0.41                    | 9   | Slovenia       | 0.90                                |
| 10                                   | Bulgaria       | 0.37                    | 10  | Czech Republic | 0.82                                |
| 11                                   | Denmark        | 0.34                    | 11  | Netherlands    | 0.77                                |
| 12                                   | Croatia        | 0.33                    | 12  | Romania        | 0.76                                |
| 13                                   | Hungary        | 0.29                    | 13  | Croatia        | 0.73                                |
| 14                                   | Romania        | 0.25                    | 14  | Bulgaria       | 0.73                                |
| 15                                   | Switzerland    | 0.21                    | 15  | Liechtenstein  | 0.71                                |
| 16                                   | Czech Republic | 0.21                    | 16  | European Union | 0.62                                |
| 17                                   | European Union | 0.20                    | 17  | Italy          | 0.59                                |
| 18                                   | Germany        | 0.14                    | 18  | Poland         | 0.55                                |
| 19                                   | Poland         | 0.13                    | 19  | United Kingdom | 0.51                                |
| 20                                   | Liechtenstein  | 0.13                    | 20  | Latvia         | 0.38                                |
| 21                                   | Slovakia       | 0.13                    | 21  | Slovakia       | 0.36                                |
| 22                                   | Spain          | 0.07                    | 22  | Finland        | 0.34                                |
| 23                                   | Greece         | 0.07                    | 23  | Ireland        | 0.28                                |
| 24                                   | Portugal       | 0.06                    | 24  | Norway         | 0.21                                |
| 25                                   | Ireland        | 0.05                    | 25  | Sweden         | 0.21                                |
| 26                                   | Luxembourg     | 0.03                    | 26  | Luxembourg     | 0.19                                |
| 27                                   | United Kingdom | 0.02                    | 27  | Greece         | 0.19                                |
| 28                                   | Netherlands    | 0.02                    | 28  | Portugal       | 0.19                                |
| 29                                   | Italy          | 0.01                    | 29  | Spain          | 0.19                                |
| 30                                   | Cyprus         | 0.01                    | 30  | Cyprus         | 0.03                                |
| 31                                   | Malta          | 0.00                    | 31  | Malta          | 0.00                                |

Total harvest in Norway in 2020 is estimated at 11,77 mio. m<sup>3</sup>, hereof biomass is estimated at 13% (5)

Forest ownership in Norway (6)

By 2020 Norway have 125.485 forest estates with a size above 2,5 hectare, see figure below. (10 dekar = 1 ha).



| Skogeiendommer og produktivt skogareal |                   |              |                      |              |
|--|-------------------|--------------|----------------------|--------------|
|  | 2020              |              |                      |              |
|  | Antall eiendommer | Andel        | Produktivt skogareal | Andel        |
| <b>I alt</b>                           | <b>125 485</b>    | <b>100,0</b> | <b>69 923 528</b>    | <b>100,0</b> |
| <b>Produktivt skogareal i dekar</b>    |                   |              |                      |              |
| 25-99 dekar                            | 43 002            | 33,8         | 2 391 992            | 3,4          |
| 100-249 dekar                          | 32 694            | 26,3         | 5 352 317            | 7,7          |
| 250-499 dekar                          | 21 660            | 17,4         | 7 701 494            | 11,0         |
| 500-999 dekar                          | 15 386            | 12,3         | 10 780 066           | 15,4         |
| 1 000-1 999 dekar                      | 7 953             | 6,3          | 10 946 728           | 15,7         |
| 2 000-4 999 dekar                      | 3 592             | 2,9          | 10 570 789           | 15,1         |
| 5 000-19 999 dekar                     | 970               | 0,8          | 8 398 721            | 12,0         |
| 20 000 dekar eller mer                 | 228               | 0,2          | 13 781 420           | 19,7         |

[Standardtegn i tabeller](#)

#### Kilde

[Statistikkbanken kildetabell 06331](#)

[Statistikkbanken kildetabell 06307](#)

From the table below ownership of the productive forest is shown. As can be seen, the majority of the forest area is owned by private individuals: 5,4 mill. Ha, 78 %; while the state owns about 0,618 mill. Ha, 8,8 %.

|                                   | Produktivt skogareal (dekar) |            |            |            |            |            |            |            |
|-----------------------------------|------------------------------|------------|------------|------------|------------|------------|------------|------------|
|                                   | 2013                         | 2014       | 2015       | 2016       | 2017       | 2018       | 2019       | 2020       |
| Total                             | 70 264 345                   | 70 296 781 | 70 082 861 | 69 855 566 | 70 023 492 | 69 988 122 | 69 985 224 | 69 923 528 |
| Enkeltpersoner                    | 54 890 173                   | 55 079 499 | 55 013 970 | 54 876 627 | 55 082 150 | 54 933 008 | 54 914 818 | 54 512 958 |
| Privat eier utenom enkeltpersoner | 3 671 465                    | 3 810 366  | 3 994 553  | 3 973 604  | 3 829 797  | 3 957 626  | 3 962 345  | 4 383 945  |
| Statlig eie                       | 6 495 630                    | 6 272 975  | 6 142 168  | 6 117 619  | 6 121 359  | 6 189 948  | 6 161 934  | 6 177 480  |
| Kommunalt- og fylkeskommunalt eie | 2 164 183                    | 2 185 683  | 2 046 550  | 2 037 335  | 2 115 751  | 2 139 092  | 2 138 810  | 2 127 309  |
| Bygdeallmenning                   | 1 802 787                    | 1 723 895  | 1 817 945  | 1 788 485  | 1 801 434  | 1 802 032  | 1 802 024  | 1 775 930  |
| Dødsbo                            | 952 865                      | 925 812    | 858 043    | 857 978    | 921 461    | 835 706    | 795 324    | 584 306    |
| Annet / uoppgitt                  | 287 242                      | 298 551    | 209 632    | 203 918    | 151 540    | 130 712    | 209 970    | 361 601    |

#### Socioeconomic setting (7)

The export value of timber, lumber, wood products, firewood, chips, paper, cardboard and wood pulp was a total of NOK 16 billion in 2021. Measured in nominal prices, this is the highest value since 2001. The composition of the export goods has naturally changed, and timber and lumber now makes up a much

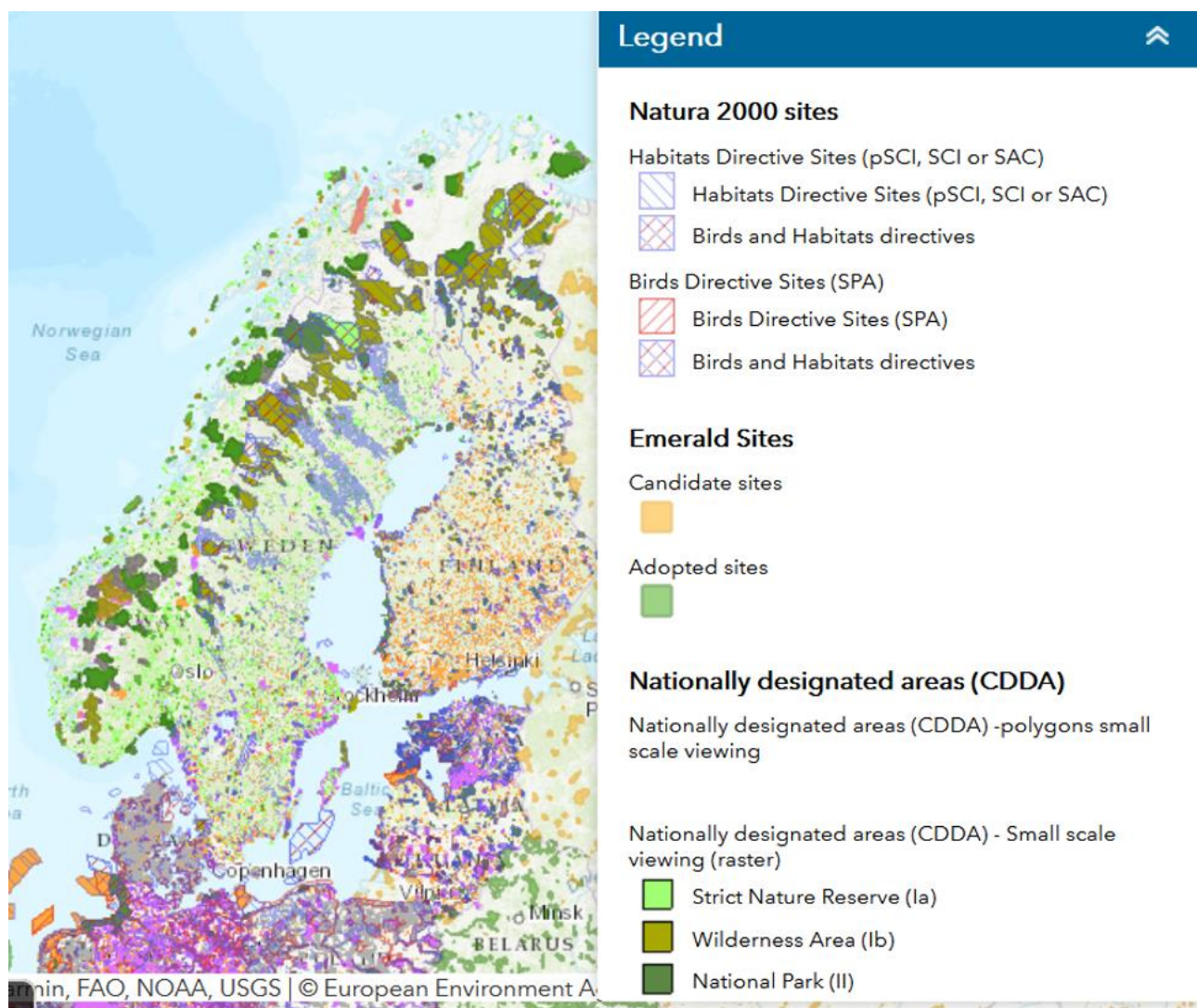
larger part than 20 years ago. In 2021, the export value of timber and lumber was almost NOK 4.6 billion, while in 2001 it was barely NOK 1 billion.

If we calculate the export value of timber and wood-based goods at 2021 kroner, we find that we exported goods worth 27.1 billion 2021 kroner in 1995. 2000 and 2001 were also good years for the forest industry, and the total value of exports for timber and wood-based product was over 25.2 billion 2021 kroner in both of these years.

By 2022 6.152 people were employed in forestry in Norway (8)

### Conservation and protection

Cites species are present in Norway but do not include threatened softwood or deciduous species. Norway has a considerable number of IUCN categories, see the figure below.



### IUCN categories and locations in Norway (9)

In Norway, reported threats to any Red List species are not from forestry or farming practices. Land Use Change provides the greatest threat(10), an example being construction activities. Norway is party to several international agreements that deal with the protection of threatened species and cover forestry and

land management practices. The most important of these are the Convention on Biological Diversity, the Bern Convention, the CITES Convention and the Ramsar Convention

IBV list of species sourced from Norway with protection status listed below:

| Species   | CITES status (11) | IUCN classification (12) |
|---|-------------------|--------------------------|
| Spruce ( <i>Picea abies</i> , <i>Picea sitchensis</i> ) | Not on the list   | Least concern (LC)       |

References:

- (1) <https://www.abcnyheter.no/nyheter/politikk/2021/07/07/195771154/eu-vil-endre-maten-norge-driver-skogbruk-pa>
- (2) <https://www.ssb.no/jord-skog-jakt-og-fiskeri/faktaside/skogbruk>
- (3) <https://norskog.no/nytt-fra-norskog-forsiden-og-egen-side/miljosiden-krever-en-skogpolitikk-kun-pa-naturens-premisser/>
- (4) <https://www.sciendo.com/pdf/10.2478/aree-2018-0002>
- (5) <https://forest-data.unece.org/Countries/NO#3>
- (6) <https://www.ssb.no/jord-skog-jakt-og-fiskeri/skogbruk/statistikk/skogeierdommer>
- (7) <https://www.ssb.no/jord-skog-jakt-og-fiskeri/skogbruk/artikler/fra-foredling-til-rastoffleverandor>
- (8) <https://www.ssb.no/jord-skog-jakt-og-fiskeri/faktaside/skogbruk>
- (9) <http://www.eea.europa.eu/data-and-maps/explore-interactive-maps/european-protected-areas-1>
- (10) <http://www.biodiversity.no/Pages/230699>
- (11) <https://checklist.cites.org/#/en>
- (12) <https://www.iucnredlist.org/>
- (13): [https://ntnuopen.ntnu.no/ntnu-xmlui/bitstream/handle/11250/271983/123378\\_FULLTEXT01.pdf?sequence=1&isAllowed=y](https://ntnuopen.ntnu.no/ntnu-xmlui/bitstream/handle/11250/271983/123378_FULLTEXT01.pdf?sequence=1&isAllowed=y)

## **2.3 Actions taken to promote certification amongst feedstock supplier**

IBV buys from PEFC certified as well as non certified forests.

## 2.4 Quantification of the Supply Base

### Supply Base

- a. **Total Supply Base area (million ha):** 42,00
- b. **Tenure by type (million ha):** 28.58 (Privately owned), 12.44 (Public), 0.98 (Community concession)
- c. **Forest by type (million ha):** 11.33 (Boreal), 30.67 (Temperate)
- d. **Forest by management type (million ha):** 0.55 (Plantation), 8.50 (Managed natural), 32.95 (Natural)
- e. **Certified forest by scheme (million ha):** 2.53 (FSC), 21.97 (PEFC)

**Describe the harvesting type which best describes how your material is sourced:** Mix of the above

**Explanation:** Depends on the country of harvest. Clearcuts (estimated at around 40% of volume) have an estimated upper size of 5 hectares, however, the majority of feedstock originates from thinning and selective fellings. In some of the countries in the supply base clear cutting requires special permission and in some of the countries in the supply base clear cuts are not allowed. Modern forest machinery is generally used throughout IBV's supply chains.

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

**Explanation:** IBV's primary business is sawmilling with profitability relying on good quality sawlogs. Price structures from IBV encourage forest owners to produce high quality saw logs.

**For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?** Yes - Majority

**Explanation:** Forest legislation in the countries in the supply base demand forest regeneration. The total forest area in the countries in the supply base is increasing.

**Was the feedstock used in the biomass removed from a forest as part of a pest/disease control measure or a salvage operation?** Yes - Minority

**Explanation:** Central european forests damaged by drought in 2018 and 2019 have generated a supply of pest/disease affected sawlogs with volumes of primary and secondary feedstock entering the pellet production. In general, pest and disease affected logs may be prone to drying damages and other damages causing them to be less attractive for the sawmill.

**What is the estimated amount of REDII-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated):** 110000000,00 m<sup>3</sup>

**Explanation:** IBV estimate an estimated annual increment of 10m<sup>3</sup> per hectare in its supply base multiplied by 21.97 million hectares of PEFC certified area and a conversion factor of 50% including bark

### Feedstock

**Reporting period from:** 01 Jan 2022

**Reporting period to:** 31 Dec 2022

- a. **Total volume of Feedstock:** 600,000-800,000 tonnes
- b. **Volume of primary feedstock:** 1-200,000 tonnes
- c. **List percentage of primary feedstock, by the following categories.**
  - Certified to an SBP-approved Forest Management Scheme: 40% - 59%
  - Not certified to an SBP-approved Forest Management Scheme: 40% - 59%

- d. List of all the species in primary feedstock, including scientific name:** Picea abies (Spruce); Pseudotsuga menziesii (Douglas fir); Pinus sylvestris (Pine); Larix eurolepis (Larch); Quercus robur (Oak); Betula pendula (Birch); Fagus sylvatica (Beech); Fraxinus excelsior (Ash);
- e. Is any of the feedstock used likely to have come from protected or threatened species?** No
- Name of species: N/A
  - Biomass proportion, by weight, that is likely to be composed of that species (%): N/A
- f. Hardwood (i.e. broadleaf trees): specify proportion of biomass from (%):** 1,00
- g. Softwood (i.e. coniferous trees): specify proportion of biomass from (%):** 99,00
- h. Proportion of biomass composed of or derived from saw logs (%):** 0,00
- i. Specify the local regulations or industry standards that define saw logs:** RVR  
Rahmenvereinbarung Rundholz Handel
- j. Roundwood from final fellings from forests with > 40 yr rotation times - Average % volume of fellings delivered to BP (%):** 8,00
- k. Volume of primary feedstock from primary forest:** 0 N/A
- l. List percentage of primary feedstock from primary forest, by the following categories. Subdivide by SBP-approved Forest Management Schemes:**
- Primary feedstock from primary forest certified to an SBP-approved Forest Management Scheme: N/A
  - Primary feedstock from primary forest not certified to an SBP-approved Forest Management Scheme: N/A
- m. Volume of secondary feedstock:** 400,000-600,000 tonnes
- Physical form of the feedstock: Chips, Sawdust
- n. Volume of tertiary feedstock:** 400,000-600,000 tonnes
- Physical form of the feedstock: Other (specify), Shavings
- o. Estimated amount of REDII-compliant sustainable feedstock that could be collected annually by the BP:** 500000,00tonnes

| Proportion of feedstock sourced per type of claim during the reporting period |   |       |        |       |
|---|---|-------|--------|-------|
| Feedstock type  | Sourced by using Supply Base Evaluation (SBE) % | FSC % | PEFC % | SFI % |
| Primary   | 50,00   | 0,00  | 50,00  | 0,00  |
| Secondary   | 50,00   | 0,00  | 50,00  | 0,00  |
| Tertiary  | 50,00   | 0,00  | 50,00  | 0,00  |
| Other   | 100,00  | 0,00  | 0,00   | 0,00  |

### **3 Requirement for a Supply Base Evaluation**

*Note: Annex 1 is generated by the system if the SBE is used without Region Risk Assessment(s). Annex 2 is generated if RED II SBE is in the scope.*

**Is Supply Base Evaluation (SBE) is completed? No**

N/A

**Is REDII SBE completed? No**

N/A

## **4 Supply Base Evaluation**

### **4.1 Scope**

Feedstock types included in SBE: N/A

SBP-endorsed Regional Risk Assessments used: Not applicable

List of countries and regions included in the SBE:

N/A

### **4.2 Justification**

N/A

### **4.3 Results of risk assessment and Supplier Verification Programme**

N/A

### **4.4 Conclusion**

N/A

# 5 Supply Base Evaluation process

N/A



## **6 Stakeholder consultation**

N/A

### **6.1 Response to stakeholder comments**

N/A

## **7 Mitigation measures**

### **7.1 Mitigation measures**

N/A

### **7.2 Monitoring and outcomes**

N/A

## **8 Detailed findings for indicators**

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

**Is RRA used?** N/A

## **9 Review of report**

### **9.1 Peer review**

N/A

### **9.2 Public or additional reviews**

N/A

## 10 Approval of report

| Approval of Supply Base Report by senior management   |                          |                |             |
|---|--------------------------|----------------|-------------|
| Report Prepared by:   | Emmanuel Nistajakis      | N/A            | 14 Apr 2023 |
|   | Name                     | Title          | Date        |
| Report Prepared by:   | Anders Bjørnkjær-Nielsen | SBP consultant | 14 Apr 2023 |
|   | Name                     | Title          | Date        |
|   |                          |                |             |
| <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:   | Andreas Pauls            | N/A            | 14 Apr 2023 |
|   | Name                     | Title          | Date        |

# **Annex 1: Detailed findings for Supply Base Evaluation indicators**

N/A

## Annex 2: Detailed findings for REDII Supply Base Evaluation indicators (Level B)

| Country:Belgium   |  |
|---|--|
| <b>(i) The legality of harvesting operations</b>  |  |
| <b>Type of Risk Assessment used</b>   | <input type="checkbox"/> Level A – proof at national or sub-national level<br><input checked="" type="checkbox"/> Level B – management system at forest sourcing area level                |
| <b>Level A risk assessment description</b>  | N/A  |
| <b>Level B management system at the level of the forest sourcing area</b>   | Primary PEFC FM certified feedstock or secondary PEFC certified feedstock sourced directly by the forest or via a chain of custody certified supplier is considered REDII compliant by IBV |
| <b>(ii) Forest regeneration of harvested areas</b>  |  |
| <b>Type of Risk Assessment used</b>   | <input type="checkbox"/> Level A – proof at national or sub-national level<br><input checked="" type="checkbox"/> Level B – management system at forest sourcing area level                |
| <b>Level A risk assessment description</b>  | N/A  |
| <b>Level B management system at the level of the forest sourcing area</b>   | Primary PEFC FM certified feedstock or secondary PEFC certified feedstock sourced directly by the forest or via a chain of custody certified supplier is considered REDII compliant by IBV |
| <b>(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands and peatlands, are protected unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes</b> |  |
| <b>Type of Risk Assessment used</b>   | <input type="checkbox"/> Level A – proof at national or sub-national level<br><input checked="" type="checkbox"/> Level B – management system at forest sourcing area level                |
| <b>Level A risk assessment description</b>  | N/A  |
| <b>Level B management system at the level of the forest sourcing area</b>   | Primary PEFC FM certified feedstock or secondary PEFC certified feedstock sourced directly by the forest or via a chain of custody certified supplier is considered REDII compliant by IBV |
| <b>(iv) That harvesting is carried out considering the maintenance of soil quality and biodiversity with the aim of minimising negative impacts</b>   |  |

|   |  |
|---|--|
| <b>Type of Risk Assessment used</b>   | <input type="checkbox"/> Level A – proof at national or sub-national level<br><input checked="" type="checkbox"/> Level B – management system at forest sourcing area level                |
| <b>Level A risk assessment description</b>  | N/A  |
| <b>Level B management system at the level of the forest sourcing area</b>                         | Primary PEFC FM certified feedstock or secondary PEFC certified feedstock sourced directly by the forest or via a chain of custody certified supplier is considered REDII compliant by IBV |
| <b>(v) That harvesting maintains or improves the long-term production capacity of the forest.</b> |  |
| <b>Type of Risk Assessment used</b>   | <input type="checkbox"/> Level A – proof at national or sub-national level<br><input checked="" type="checkbox"/> Level B – management system at forest sourcing area level                |
| <b>Level A risk assessment description</b>  | N/A  |
| <b>Level B management system at the level of the forest sourcing area</b>                         | Primary PEFC FM certified feedstock or secondary PEFC certified feedstock sourced directly by the forest or via a chain of custody certified supplier is considered REDII compliant by IBV |
| <b>LULUCF criteria 29(7)</b>  |  |
| <b>Type of Risk Assessment used</b>   | <input type="checkbox"/> Level A – proof at national or sub-national level<br><input checked="" type="checkbox"/> Level B – management system at forest sourcing area level                |
| <b>Level A risk assessment description</b>  | N/A  |
| <b>Level B management system at the level of the forest sourcing area</b>                         | SBP has by March 2023 published SBP-endorsed REDII Level A risk assessment for Article 29(7) LULUCF covering all EU members states   |

|  |   |
|--|---|
| <b>Country:Germany</b>                           |   |
| <b>(i) The legality of harvesting operations</b> |   |
| <b>Type of Risk Assessment used</b>              | <input checked="" type="checkbox"/> Level A – proof at national or sub-national level<br><input type="checkbox"/> Level B – management system at forest sourcing area level |
| <b>Level A risk assessment description</b>       | Level A risk assessment for Germany published by Bundesverband Bioenergie (BBE), the Federal Bioenergy Association.   |



|   |   |
|---|---|
| <b>Level B management system at the level of the forest sourcing area</b>   | N/A   |
| <b>(ii) Forest regeneration of harvested areas</b>  |   |
| <b>Type of Risk Assessment used</b>   | <input checked="" type="checkbox"/> Level A – proof at national or sub-national level<br><input type="checkbox"/> Level B – management system at forest sourcing area level |
| <b>Level A risk assessment description</b>  | Level A risk assessment for Germany published by Bundesverband Bioenergie (BBE), the Federal Bioenergy Association.   |
| <b>Level B management system at the level of the forest sourcing area</b>   | N/A   |
| <b>(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands and peatlands, are protected unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes</b> |   |
| <b>Type of Risk Assessment used</b>   | <input checked="" type="checkbox"/> Level A – proof at national or sub-national level<br><input type="checkbox"/> Level B – management system at forest sourcing area level |
| <b>Level A risk assessment description</b>  | Level A risk assessment for Germany published by Bundesverband Bioenergie (BBE), the Federal Bioenergy Association.   |
| <b>Level B management system at the level of the forest sourcing area</b>   | N/A   |
| <b>(iv) That harvesting is carried out considering the maintenance of soil quality and biodiversity with the aim of minimising negative impacts</b>   |   |
| <b>Type of Risk Assessment used</b>   | <input checked="" type="checkbox"/> Level A – proof at national or sub-national level<br><input type="checkbox"/> Level B – management system at forest sourcing area level |
| <b>Level A risk assessment description</b>  | Level A risk assessment for Germany published by Bundesverband Bioenergie (BBE), the Federal Bioenergy Association.   |
| <b>Level B management system at the level of the forest sourcing area</b>   | N/A   |
| <b>(v) That harvesting maintains or improves the long-term production capacity of the forest.</b>   |   |
| <b>Type of Risk Assessment used</b>   | <input checked="" type="checkbox"/> Level A – proof at national or sub-national level<br><input type="checkbox"/> Level B – management system at forest sourcing area level |

|   |   |
|---|---|
| <b>Level A risk assessment description</b>                                | Level A risk assessment for Germany published by Bundesverband Bioenergie (BBE), the Federal Bioenergy Association.   |
| <b>Level B management system at the level of the forest sourcing area</b> | N/A   |
| <b>LULUCF criteria 29(7)</b>  |   |
| <b>Type of Risk Assessment used</b>                                       | <input checked="" type="checkbox"/> Level A – proof at national or sub-national level<br><input type="checkbox"/> Level B – management system at forest sourcing area level |
| <b>Level A risk assessment description</b>                                | Level A risk assessment for Germany published by Bundesverband Bioenergie (BBE), the Federal Bioenergy Association.   |
| <b>Level B management system at the level of the forest sourcing area</b> | N/A   |

| <b>Country: Luxembourg</b>  |  |
|---|--|
| <b>(i) The legality of harvesting operations</b>                          |  |
| <b>Type of Risk Assessment used</b>                                       | <input type="checkbox"/> Level A – proof at national or sub-national level<br><input checked="" type="checkbox"/> Level B – management system at forest sourcing area level                |
| <b>Level A risk assessment description</b>                                | N/A  |
| <b>Level B management system at the level of the forest sourcing area</b> | Primary PEFC FM certified feedstock or secondary PEFC certified feedstock sourced directly by the forest or via a chain of custody certified supplier is considered REDII compliant by IBV |
| <b>(ii) Forest regeneration of harvested areas</b>                        |  |
| <b>Type of Risk Assessment used</b>                                       | <input type="checkbox"/> Level A – proof at national or sub-national level<br><input checked="" type="checkbox"/> Level B – management system at forest sourcing area level                |
| <b>Level A risk assessment description</b>                                | N/A  |
| <b>Level B management system at the level of the forest sourcing area</b> | Primary PEFC FM certified feedstock or secondary PEFC certified feedstock sourced directly by the forest or via a chain of custody certified supplier is considered REDII compliant by IBV |

|   |  |
|---|--|
| <b>(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands and peatlands, are protected unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes</b> |  |
| <b>Type of Risk Assessment used</b>   | <input type="checkbox"/> Level A – proof at national or sub-national level<br><input checked="" type="checkbox"/> Level B – management system at forest sourcing area level                |
| <b>Level A risk assessment description</b>  | N/A  |
| <b>Level B management system at the level of the forest sourcing area</b>   | Primary PEFC FM certified feedstock or secondary PEFC certified feedstock sourced directly by the forest or via a chain of custody certified supplier is considered REDII compliant by IBV |
| <b>(iv) That harvesting is carried out considering the maintenance of soil quality and biodiversity with the aim of minimising negative impacts</b>   |  |
| <b>Type of Risk Assessment used</b>   | <input type="checkbox"/> Level A – proof at national or sub-national level<br><input checked="" type="checkbox"/> Level B – management system at forest sourcing area level                |
| <b>Level A risk assessment description</b>  | N/A  |
| <b>Level B management system at the level of the forest sourcing area</b>   | Primary PEFC FM certified feedstock or secondary PEFC certified feedstock sourced directly by the forest or via a chain of custody certified supplier is considered REDII compliant by IBV |
| <b>(v) That harvesting maintains or improves the long-term production capacity of the forest.</b>   |  |
| <b>Type of Risk Assessment used</b>   | <input type="checkbox"/> Level A – proof at national or sub-national level<br><input checked="" type="checkbox"/> Level B – management system at forest sourcing area level                |
| <b>Level A risk assessment description</b>  | N/A  |
| <b>Level B management system at the level of the forest sourcing area</b>   | Primary PEFC FM certified feedstock or secondary PEFC certified feedstock sourced directly by the forest or via a chain of custody certified supplier is considered REDII compliant by IBV |
| <b>LULUCF criteria 29(7)</b>  |  |
| <b>Type of Risk Assessment used</b>   | <input type="checkbox"/> Level A – proof at national or sub-national level<br><input checked="" type="checkbox"/> Level B – management system at forest sourcing area level                |
| <b>Level A risk assessment description</b>  | N/A  |

|   |  |
|---|--|
| <b>Level B management system at the level of the forest sourcing area</b> | SBP has by March 2023 published SBP-endorsed REDII Level A risk assessment for Article 29(7) LULUCF covering all EU members states |
|---|--|

**Country: France**

**(i) The legality of harvesting operations**

|   |  |
|---|--|
| <b>Type of Risk Assessment used</b>                                       | <input type="checkbox"/> Level A – proof at national or sub-national level<br><input checked="" type="checkbox"/> Level B – management system at forest sourcing area level                |
| <b>Level A risk assessment description</b>                                | N/A  |
| <b>Level B management system at the level of the forest sourcing area</b> | Primary PEFC FM certified feedstock or secondary PEFC certified feedstock sourced directly by the forest or via a chain of custody certified supplier is considered REDII compliant by IBV |

**(ii) Forest regeneration of harvested areas**

|   |  |
|---|--|
| <b>Type of Risk Assessment used</b>                                       | <input type="checkbox"/> Level A – proof at national or sub-national level<br><input checked="" type="checkbox"/> Level B – management system at forest sourcing area level                |
| <b>Level A risk assessment description</b>                                | N/A  |
| <b>Level B management system at the level of the forest sourcing area</b> | Primary PEFC FM certified feedstock or secondary PEFC certified feedstock sourced directly by the forest or via a chain of custody certified supplier is considered REDII compliant by IBV |

**(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands and peatlands, are protected unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes**

|   |  |
|---|--|
| <b>Type of Risk Assessment used</b>                                       | <input type="checkbox"/> Level A – proof at national or sub-national level<br><input checked="" type="checkbox"/> Level B – management system at forest sourcing area level                |
| <b>Level A risk assessment description</b>                                | N/A  |
| <b>Level B management system at the level of the forest sourcing area</b> | Primary PEFC FM certified feedstock or secondary PEFC certified feedstock sourced directly by the forest or via a chain of custody certified supplier is considered REDII compliant by IBV |

|   |  |
|---|--|
| <b>(iv) That harvesting is carried out considering the maintenance of soil quality and biodiversity with the aim of minimising negative impacts</b> |  |
| <b>Type of Risk Assessment used</b>   | <input type="checkbox"/> Level A – proof at national or sub-national level<br><input checked="" type="checkbox"/> Level B – management system at forest sourcing area level                |
| <b>Level A risk assessment description</b>  | N/A  |
| <b>Level B management system at the level of the forest sourcing area</b>   | Primary PEFC FM certified feedstock or secondary PEFC certified feedstock sourced directly by the forest or via a chain of custody certified supplier is considered REDII compliant by IBV |
| <b>(v) That harvesting maintains or improves the long-term production capacity of the forest.</b>   |  |
| <b>Type of Risk Assessment used</b>   | <input type="checkbox"/> Level A – proof at national or sub-national level<br><input checked="" type="checkbox"/> Level B – management system at forest sourcing area level                |
| <b>Level A risk assessment description</b>  | N/A  |
| <b>Level B management system at the level of the forest sourcing area</b>   | Primary PEFC FM certified feedstock or secondary PEFC certified feedstock sourced directly by the forest or via a chain of custody certified supplier is considered REDII compliant by IBV |
| <b>LULUCF criteria 29(7)</b>  |  |
| <b>Type of Risk Assessment used</b>   | <input type="checkbox"/> Level A – proof at national or sub-national level<br><input checked="" type="checkbox"/> Level B – management system at forest sourcing area level                |
| <b>Level A risk assessment description</b>  | N/A  |
| <b>Level B management system at the level of the forest sourcing area</b>   | SBP has by March 2023 published SBP-endorsed REDII Level A risk assessment for Article 29(7) LULUCF covering all EU members states   |

**Country: Netherlands**

|  |   |
|--|---|
| <b>(i) The legality of harvesting operations</b> |   |
| <b>Type of Risk Assessment used</b>              | <input type="checkbox"/> Level A – proof at national or sub-national level<br><input checked="" type="checkbox"/> Level B – management system at forest sourcing area level |

|   |  |
|---|--|
| <b>Level A risk assessment description</b>  | N/A  |
| <b>Level B management system at the level of the forest sourcing area</b>   | Primary PEFC FM certified feedstock or secondary PEFC certified feedstock sourced directly by the forest or via a chain of custody certified supplier is considered REDII compliant by IBV |
| <b>(ii) Forest regeneration of harvested areas</b>  |  |
| <b>Type of Risk Assessment used</b>   | <input type="checkbox"/> Level A – proof at national or sub-national level<br><input checked="" type="checkbox"/> Level B – management system at forest sourcing area level                |
| <b>Level A risk assessment description</b>  | N/A  |
| <b>Level B management system at the level of the forest sourcing area</b>   | Primary PEFC FM certified feedstock or secondary PEFC certified feedstock sourced directly by the forest or via a chain of custody certified supplier is considered REDII compliant by IBV |
| <b>(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands and peatlands, are protected unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes</b> |  |
| <b>Type of Risk Assessment used</b>   | <input type="checkbox"/> Level A – proof at national or sub-national level<br><input checked="" type="checkbox"/> Level B – management system at forest sourcing area level                |
| <b>Level A risk assessment description</b>  | N/A  |
| <b>Level B management system at the level of the forest sourcing area</b>   | Primary PEFC FM certified feedstock or secondary PEFC certified feedstock sourced directly by the forest or via a chain of custody certified supplier is considered REDII compliant by IBV |
| <b>(iv) That harvesting is carried out considering the maintenance of soil quality and biodiversity with the aim of minimising negative impacts</b>   |  |
| <b>Type of Risk Assessment used</b>   | <input type="checkbox"/> Level A – proof at national or sub-national level<br><input checked="" type="checkbox"/> Level B – management system at forest sourcing area level                |
| <b>Level A risk assessment description</b>  | N/A  |
| <b>Level B management system at the level of the forest sourcing area</b>   | Primary PEFC FM certified feedstock or secondary PEFC certified feedstock sourced directly by the forest or via a chain of custody certified supplier is considered REDII compliant by IBV |
| <b>(v) That harvesting maintains or improves the long-term production capacity of the forest.</b>   |  |

|   |  |
|---|--|
| <b>Type of Risk Assessment used</b>                                       | <input type="checkbox"/> Level A – proof at national or sub-national level<br><input checked="" type="checkbox"/> Level B – management system at forest sourcing area level                |
| <b>Level A risk assessment description</b>                                | N/A  |
| <b>Level B management system at the level of the forest sourcing area</b> | Primary PEFC FM certified feedstock or secondary PEFC certified feedstock sourced directly by the forest or via a chain of custody certified supplier is considered REDII compliant by IBV |
| <b>LULUCF criteria 29(7)</b>  |  |
| <b>Type of Risk Assessment used</b>                                       | <input type="checkbox"/> Level A – proof at national or sub-national level<br><input checked="" type="checkbox"/> Level B – management system at forest sourcing area level                |
| <b>Level A risk assessment description</b>                                | N/A  |
| <b>Level B management system at the level of the forest sourcing area</b> | SBP has by March 2023 published SBP-endorsed REDII Level A risk assessment for Article 29(7) LULUCF covering all EU members states   |

| <b>Country:Norway</b>   |   |
|---|---|
| <b>(i) The legality of harvesting operations</b>                          |   |
| <b>Type of Risk Assessment used</b>                                       | <input type="checkbox"/> Level A – proof at national or sub-national level<br><input checked="" type="checkbox"/> Level B – management system at forest sourcing area level                 |
| <b>Level A risk assessment description</b>                                | N/A   |
| <b>Level B management system at the level of the forest sourcing area</b> | Primary PEFC FM certified feedstock or secondary PEFC certified feedstock sourced directly by the forest or via a chain of custody certified suppliers is considered REDII compliant by IBV |

| <b>(ii) Forest regeneration of harvested areas</b>  |   |
|---|---|
| <b>Type of Risk Assessment used</b>   | <input type="checkbox"/> Level A – proof at national or sub-national level<br><input checked="" type="checkbox"/> Level B – management system at forest sourcing area level                 |
| <b>Level A risk assessment description</b>  | N/A   |
| <b>Level B management system at the level of the forest sourcing area</b>   | Primary PEFC FM certified feedstock or secondary PEFC certified feedstock sourced directly by the forest or via a chain of custody certified suppliers is considered REDII compliant by IBV |
| <b>(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands and peatlands, are protected unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes</b> |   |
| <b>Type of Risk Assessment used</b>   | <input type="checkbox"/> Level A – proof at national or sub-national level<br><input checked="" type="checkbox"/> Level B – management system at forest sourcing area level                 |
| <b>Level A risk assessment description</b>  | N/A   |
| <b>Level B management system at the level of the forest sourcing area</b>   | Primary PEFC FM certified feedstock or secondary PEFC certified feedstock sourced directly by the forest or via a chain of custody certified suppliers is considered REDII compliant by IBV |
| <b>(iv) That harvesting is carried out considering the maintenance of soil quality and biodiversity with the aim of minimising negative impacts</b>   |   |
| <b>Type of Risk</b>   | <input type="checkbox"/> Level A – proof at national or sub-national level  |



|   |   |
|---|---|
| <b>Assessment used</b>  | <input checked="" type="checkbox"/> Level B – management system at forest sourcing area level   |
| <b>Level A risk assessment description</b>  | N/A   |
| <b>Level B management system at the level of the forest sourcing area</b>                         | Primary PEFC FM certified feedstock or secondary PEFC certified feedstock sourced directly by the forest or via a chain of custody certified suppliers is considered REDII compliant by IBV |
| <b>(v) That harvesting maintains or improves the long-term production capacity of the forest.</b> |   |
| <b>Type of Risk Assessment used</b>   | <input type="checkbox"/> Level A – proof at national or sub-national level<br><input checked="" type="checkbox"/> Level B – management system at forest sourcing area level                 |
| <b>Level A risk assessment description</b>  | N/A   |
| <b>Level B management system at the level of the forest sourcing area</b>                         | Primary PEFC FM certified feedstock or secondary PEFC certified feedstock sourced directly by the forest or via a chain of custody certified suppliers is considered REDII compliant by IBV |
| <b>LULUCF criteria 29(7)</b>  |   |
| <b>Type of Risk Assessment used</b>   | <input type="checkbox"/> Level A – proof at national or sub-national level<br><input checked="" type="checkbox"/> Level B – management system at forest sourcing area level                 |
| <b>Level A risk assessment</b>  | N/A   |

|   |   |
|---|---|
| <b>description</b>  |   |
| <b>Level B management system at the level of the forest sourcing area</b> | <p>Primary PEFC FM certified feedstock or secondary PEFC certified feedstock sourced directly by the forest or via a chain of custody certified suppliers is considered REDII compliant by IBV.</p> <p>It is assessed that Norway is in compliance with LULUCF requirements, see:</p> <p>(1) <a href="https://www.regjeringen.no/contentassets/a78ecf5ad2344fa5ae4a394412ef8975/en-gb/pdfs/stm202020210013000engpdfs.pdf">https://www.regjeringen.no/contentassets/a78ecf5ad2344fa5ae4a394412ef8975/en-gb/pdfs/stm202020210013000engpdfs.pdf</a></p> <p>(2) <a href="https://www.eftasurv.int/cms/sites/default/files/documents/gopro/Determination%20of%20the%20forest%20reference%20levels%20%28FRLs%29.pdf">https://www.eftasurv.int/cms/sites/default/files/documents/gopro/Determination%20of%20the%20forest%20reference%20levels%20%28FRLs%29.pdf</a></p> |