

NOVALIS

Base Supply Report Template for Biomass Producers: Annex 1

www.sbp-cert.org



version 1.1 January 2019

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

Document history

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Annex 1: Findings Detailed Evaluation Indicators for Supply Base

| | Indicator |
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| 1.1.1 | The Biomass Producer's Supply Base is defined and mapped. |
| Finding | <p>Novalis defines its supply area (Supply Base) covered by this risk analysis by the Autonomous Communities:</p> <ul style="list-style-type: none"> o Andalusia, o Murcia and region o Valencian Community o Castilla La Mancha, especially the province of Albacete, with also input from Cuenca and Ciudad Real <p>These autonomous regions have clearly defined limits and with adequate mapping, both on the limits and on its forests.</p> <p>According to data obtained from the yearbooks of forest statistics of the Government of Spain, Ministry of Agriculture, Fisheries and Food (https://www.mapa.gob.es/es/desarrollo-rural/temas/politica-forestal/) And Ministry of Environment Transition (https://www.miteco.gob.es/es/biodiversidad/estadisticas/):</p> <p><u>Andalusia:</u></p> <ul style="list-style-type: none"> • Andalusia has 2.92 million hectares of forest surface of a total 4,467,000 hectares of forest area. In addition, it has 3,618,348 hectares of farmland. <p><u>Valencian Community:</u></p> <ul style="list-style-type: none"> • Valencia has 748,000 hectares of forest surface, out of a total 1,267,000 hectares of forest area. In addition, it has 658,443 hectares of farmland. <p><u>Murcia region: Murcia:</u></p> <ul style="list-style-type: none"> • Murcia has 302,000 hectares of forest surface of a total 487,000 hectares of forest area. In addition, it has 401,336 hectares of farmland. <p><u>Castilla la Mancha:</u></p> <ul style="list-style-type: none"> • Castila La Mancha has 2,740,000 hectares of forest surface of a total 3,565,000 hectares of forest area. In addition, it has 3,773,029 hectares of farmland. <p>Within this area is included the origin of feedstocks (primary wood chips), from harvesting / forestry work: pruning, thinning, clear or / and short end; or work in agricultural areas: pruning or replacement of crops, several species (see indicator 1.1.2).</p> <p>The material transport from source to port facilities is included in the scope. Normally the material is made into wood chips at origin (90% of the material), either the forest or the agricultural areas; and in some cases also logs are transported to the storing area of the port as safety stock (10% of the material). Novalis includes within the scope the storing areas at the ports (Huelva, Seville, Cadiz, Almeria, Cartagena, Alicante and Sagunto) and an intermediate storing area in Huelva (Mycsa).</p> <p>Forest wood chips and agricultural wood chips origins are always separated at the stores.</p> <p>Novalis can:</p> <ol style="list-style-type: none"> 1. make harvesting / forestry works with outsourced teams, but under its responsibility, in which case dispose all necessary information about the forest where the work is done and there is also a contract between the parties in Annex II directly refers documentation |

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| | <p>on POH (Prevention of Occupational Hazards) has to submit the subcontractor (Control and Monitoring Documentation "company or freelance ") or</p> <ol style="list-style-type: none"> buy the material (either logs or wood chips, either in piles or in storing area) to companies who did the forests works, in which case Novalis includes in the agreements signed right of access to documents evidencing their ownership, such as awards works, licenses and contracts. in the case of woody biomasses coming from non-forest areas (woody crops such as fruit trees) there are not requirement of any permit from the Administration to harvest, as they are an inherent byproduct of agricultural activity. In this case the control is limited to distinguish the type of byproduct: OLIVE TREES, FRUIT TREES and pruning residues, that will be always separated from forest biomasses, following the chain of custody of forest materials whose certificates Novalis holds. <p>Biofuel supplies may come from:</p> <ul style="list-style-type: none"> Public tenders purchasing, being always harvesting areas identified and mapped in the specifications that define the allocation of work, Contracts in private forests in which case could exist a management plan that identifies the working areas, and gives access to the cadastral reference / s plot / s affected, along with the private contract for the jobs execution. <p>In addition, into the Autonomous Communities under the scope:</p> <ul style="list-style-type: none"> Always it must be available (it is required to begin work) authorizations to work by the Autonomous Communities, where work areas are specified: License / Authorization cutting. Both, public and private forestry activities are subject to the guidelines set Public Administration, as well as under a continuous supervision by public staff. In the case of agricultural biomasses (in non-forest lands legally) there are no such permits. It's about a byproduct inherent to agricultural activity that is subsequently tapped. <p>In Spain there cadastral information of urban and rural real estate throughout the country. From the website of the General Directorate of the Cadastre (http://www.catastro.meh.es/esp/usos_utilidades.asp): "The Cadastre is an administrative record that depends on the Ministry of Finance and Public Administration. It contains the description of rural real estate, urban and special features, whose registration in it is compulsory and free, characteristics that differentiate it from the registry of property. "</p> <p>All the properties have a unique cadastral reference to identify them and locate them. "The cadastral reference is the official and obligatory identifier of real estate. It consists of an alphanumeric code, consisting of twenty characters, which is assigned by the Land Registry so that all property must have a unique cadastral reference. Cadastral reference allows the location of the property in the cadastral cartography. "</p> <p>That is why, in those jobs where are not available clear information on the work area and mapping it must be called the cadastral reference of the plot / a hit / s to define power and map them through the SigPac Autonomous Communities within the scope.</p> <p>Based on the above, the relative risk is classified like "low risk" under this indicator.</p> |
| Means of VERIFICATION | <ul style="list-style-type: none"> The working areas are known and appropriate scale maps are available; Novalis personnel demonstrate knowledge of the area of action It must have one of the following documents: <ul style="list-style-type: none"> ✓ Tender specifications work / forestry; ✓ Management Plan approved (with contract) ✓ Cadastral reference / s plot / s affected / s (with contract) ✓ Legal rights of ownership and management: licenses / permits and authorizations ✓ Agreement / supply contract in the case of agricultural biofuels |
| Evidence | <p>Portal of the General Directorate of Land Registry:</p> <ul style="list-style-type: none"> http://www.catastro.meh.es http://www.catastro.meh.es/esp/usos_utilidades.asp |

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| <p>REVIE WED</p> | <ul style="list-style-type: none"> • https://www1.sedecatastro.gob.es/Cartografia/mapa.aspx <p>Government of Spain:</p> <ul style="list-style-type: none"> • Ministry of Agriculture, Fisheries and Food: https://www.mapa.gob.es/es/ • Ecological Transition Ministry: https://www.miteco.gob.es/es/ • biodiversity: https://www.miteco.gob.es/es/biodiversidad/temas/ • Forestry statistics: https://www.miteco.gob.es/es/biodiversidad/estadisticas/ • Statistical yearbooks Forest: https://www.mapa.gob.es/es/desarrollo-rural/estadisticas/forestal_anuarios_todos.aspx • Statistical Yearbook 2017 MAP: https://www.mapa.gob.es/estadistica/pags/anuario/2017/CAPITULOS_TOTALES/AE17-C03.pdf <p>Junta de Andalucía (Regional Government of Andalusia):</p> <ul style="list-style-type: none"> • Ministry of Environment and Territory Management: http://www.juntadeandalucia.es/medioambiente/site/portalweb • Forest Service: http://www.juntadeandalucia.es/medioambiente/site/portalweb/menuitem.f497978fb79f8c757163ed105510e1ca/?vgnnextoid=4f5c659a15255310VgnVCM1000001325e50aRCRD • Infoca plan. The natural Andalusian environment: http://www.juntadeandalucia.es/medioambiente/web/Bloques_Tematicos/Patrimonio_Natural_Uso_Y_Gestion/Montes/Incendios_Forestales/plan_infoca/Cap02_medio_natural_andaluz.pdf <p>Murcia region:</p> <ul style="list-style-type: none"> • Natural: http://www.murcianatural.carm.es/web/guest • Forest area: http://www.murcianatural.carm.es/web/guest/ambito-forestal <p>Valencian Community:</p> <ul style="list-style-type: none"> • Natural: http://www.agroambient.gva.es/es/web/medio-natural.jsessionid=D9C36F1D2D4C03BAD0A1DC6DB140AE5B • Montes and Forests: http://www.agroambient.gva.es/es/web/medio-natural/montes • The forest area of Valencia: http://www.agroambient.gva.es/web/medio-natural/el-territorio-forestal-de-la-comunitat-valenciana <p>Castilla la Mancha:</p> <ul style="list-style-type: none"> • Directorate General Forestry Policy and Natural Areas, Performances: http://www.castillalamancha.es/gobierno/agrimedambydesrur/estructura/dgapfyen/actuacionesorganismo • Directorate General Forestry Policy and Natural Spaces, Sustainable Forest Management: http://www.castillalamancha.es/gobierno/agrimedambydesrur/estructura/dgapfyen/actuaciones/gestión-forestal-sostenible • Directorate General Forestry Policy and Natural Spaces, electronic headquarters: https://www.jccm.es/gobierno/agricultura/estructura/dgamen • Public roads Livestock and Forestry: http://agricultura.jccm.es/imovip/index_imv.php <p>SIGPAC portals:</p> <ul style="list-style-type: none"> • MAP: http://sigpac.mapama.gob.es/feqa/visor/ • Andalusia: http://ws128.juntadeandalucia.es/agriculturaypesca/sigpac/index.xhtml • Murcia region: https://sigpac.carm.es/VisorSigpac2017/# • Valencian Community: http://sigpac.gva.es/visor/ • Castilla La Mancha: http://sigpac.jccm.es/visorsigpachtml5/ |
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| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

| | Indicator | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-----------------------------|---|-------------|-----------------|--------|--------------|--------------------|--------|--------------|---------------------|--------|--------------|--------------------|----------|-----------|---------------------|--------|-----------------------|----------------------------|--------|-----------------------|----------------------------|--------|-----------------------|--------------------------|--------|--------------|---------------------------------|--------|-----------------------------|--------------------|----------|
| 1.1.2 | Feedstock can be traced back to the defined Supply Base. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Finding | <p>Novalis defines its supply area (Supply Base) covered by this risk analysis by the Autonomous Communities:</p> <ul style="list-style-type: none">○ Andalusia,○ Murcia○ Valencia and○ Castilla La Mancha (Provinces of Albacete, Cuenca and Ciudad Real) <p>Within this area Novalis includes into the scope any feedstock (primary feedstock) from forestry activities (pruning, thinning, clear or / and end cuttings), or from jobs in agricultural areas into tree crops (pruning or replacement of species) of the following species classified according to their origin:</p> <table><tr><th>COMMON NAME</th><th>SCIENTIFIC NAME</th><th>ORIGIN</th></tr><tr><td>ACACIA TREES</td><td><i>Acacia</i> spp.</td><td>FOREST</td></tr><tr><td>POPLAR TREES</td><td><i>Populus</i> spp.</td><td>FOREST</td></tr><tr><td>CITRUS TREES</td><td><i>Citrus</i> spp.</td><td>AGRARIAN</td></tr><tr><td>OAK TREES</td><td><i>Quercus</i> spp.</td><td>FOREST</td></tr><tr><td>WHITE EUCALYPTUS TREE</td><td><i>Eucalyptus globulus</i></td><td>FOREST</td></tr><tr><td>WHITE EUCALYPTUS TREE</td><td><i>Eucalyptus maidenii</i></td><td>FOREST</td></tr><tr><td>WHITE EUCALYPTUS TREE</td><td><i>Eucalyptus nitens</i></td><td>FOREST</td></tr><tr><td>RED GUM TREE</td><td><i>Eucalyptus camaldulensis</i></td><td>FOREST</td></tr><tr><td>BONE AND ALMOND FRUIT TREES</td><td><i>Prunus</i> spp.</td><td>AGRARIAN</td></tr></table> | COMMON NAME | SCIENTIFIC NAME | ORIGIN | ACACIA TREES | <i>Acacia</i> spp. | FOREST | POPLAR TREES | <i>Populus</i> spp. | FOREST | CITRUS TREES | <i>Citrus</i> spp. | AGRARIAN | OAK TREES | <i>Quercus</i> spp. | FOREST | WHITE EUCALYPTUS TREE | <i>Eucalyptus globulus</i> | FOREST | WHITE EUCALYPTUS TREE | <i>Eucalyptus maidenii</i> | FOREST | WHITE EUCALYPTUS TREE | <i>Eucalyptus nitens</i> | FOREST | RED GUM TREE | <i>Eucalyptus camaldulensis</i> | FOREST | BONE AND ALMOND FRUIT TREES | <i>Prunus</i> spp. | AGRARIAN |
| COMMON NAME | SCIENTIFIC NAME | ORIGIN | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| ACACIA TREES | <i>Acacia</i> spp. | FOREST | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| POPLAR TREES | <i>Populus</i> spp. | FOREST | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| CITRUS TREES | <i>Citrus</i> spp. | AGRARIAN | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| OAK TREES | <i>Quercus</i> spp. | FOREST | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| WHITE EUCALYPTUS TREE | <i>Eucalyptus globulus</i> | FOREST | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| WHITE EUCALYPTUS TREE | <i>Eucalyptus maidenii</i> | FOREST | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| WHITE EUCALYPTUS TREE | <i>Eucalyptus nitens</i> | FOREST | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| RED GUM TREE | <i>Eucalyptus camaldulensis</i> | FOREST | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| BONE AND ALMOND FRUIT TREES | <i>Prunus</i> spp. | AGRARIAN | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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|---------------------|-------------------------|-----------------------|
| WALNUT TREE | <i>Juglans regia</i> | FORESTRY / AGRARIO |
| OLIVE TREE | <i>Olea europaea</i> | AGRARIAN |
| ELM TREE | <i>Ulmus</i> spp. | FOREST |
| CARRASCO PINE TREE | <i>Pinus halepensis</i> | FOREST |
| MONTERREY PINE TREE | <i>Pinus radiata</i> | FOREST |
| LARICIO PINE TREE | <i>Pinus nigra</i> | FOREST |
| MARITIME PINE TREE | <i>Pinus pinaster</i> | FOREST |
| STONE PINE TREE | <i>Pinus pinea</i> | FOREST |
| SILVESTRE TREE | <i>Pinus sylvestris</i> | FOREST |
| TARAJE TREE | <i>Tamarix</i> spp. | FOREST |

Regarding forestry origin, the largest volume is provided by species of pine and eucalyptus trees, appearing in a more sporadic way some species of the genus *Quercus* (pruning residues of oak and cork oak mostly), poplars, acacias, *Tamarix* (from cleanings river sides done by the Junta de Andalucía), and other forest species.

Regarding agricultural origin, the material comes from pruning or replacement of fruit tree crops (olive, stone fruits and citrus).

Transport from source to port facilities of the material is included within the scope. Normally the material is made into wood chips at origin (90% of the material) from either forest or agricultural areas; and in some cases wood logs are transported to the storing area of the ports as safety stock if necessary (10% of the material). Novalis includes within the scope the storing areas into the ports (Huelva, Seville, Cadiz, Almeria, Cartagena, Alicante and Sagunto) and an intermediate storing area in Huelva (Mycsa).

Forest wood chips feedstocks are always separated from the agricultural wood chips feedstocks.

By Autonomous Communities, the distribution of agricultural crops and forests is as follows.

Andalusia:

- Quercus forests with dominant (35%). Pines forests reach 19% of the forest area of the community and eucalyptus forests 4.6%.

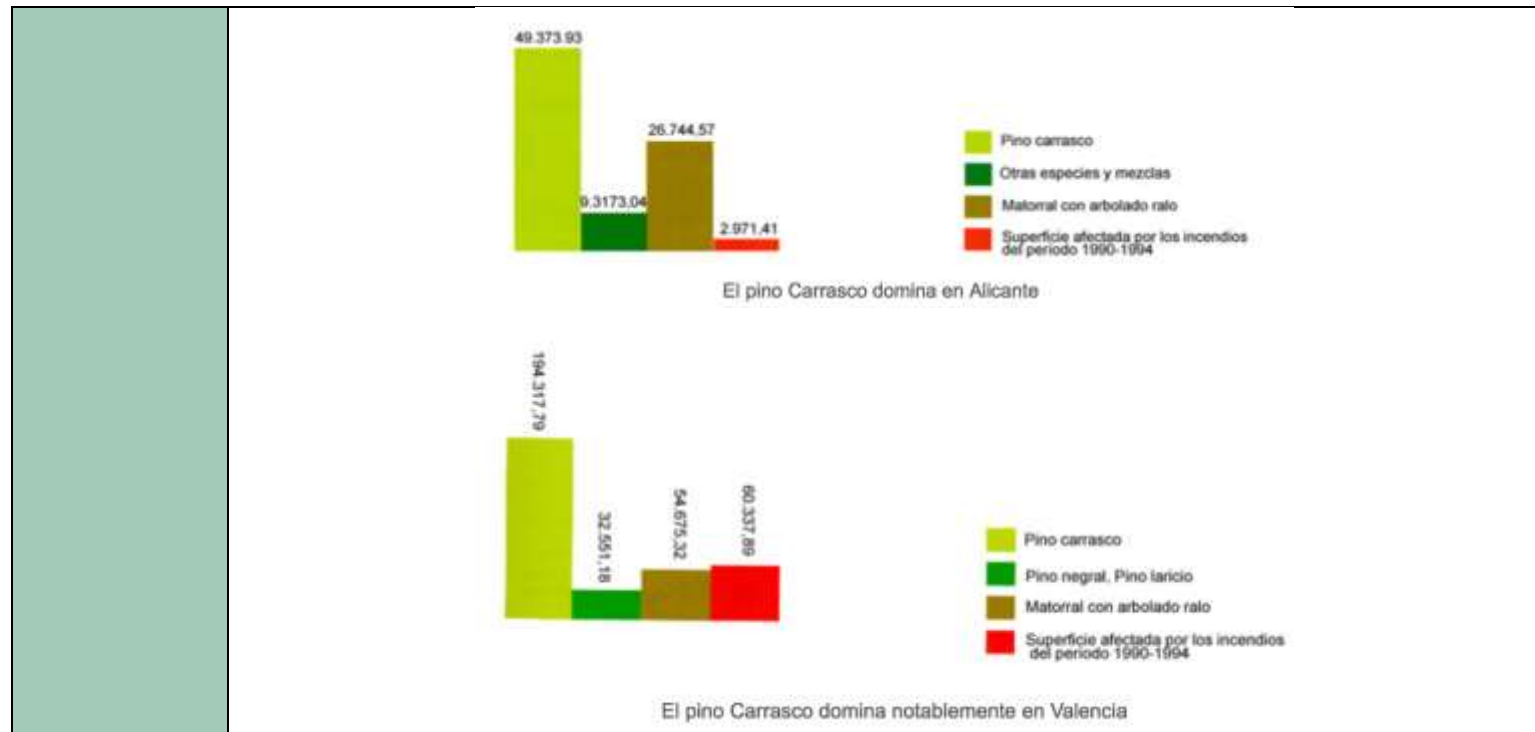
La vegetación forestal andaluza

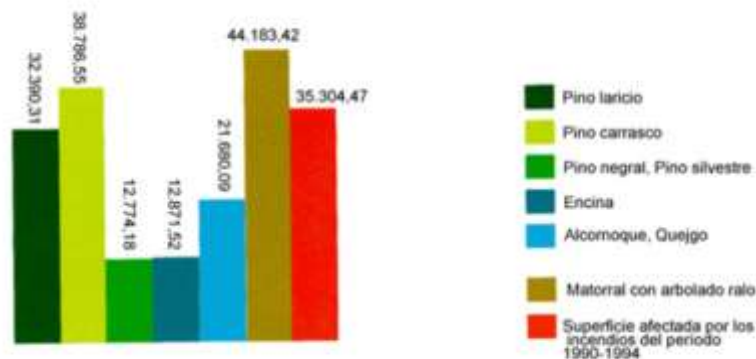
| TERRENO | ESPECIE | SUPERFICIE (MILES DE HA) | % SOBRE SUPERFICIE FORESTAL |
|-----------------------------|---------------------------|--------------------------|-----------------------------|
| Arbolados | Quercus | 1.511,3 | 34,8 |
| | Coníferas | 824,7 | 19,0 |
| | Eucalipto | 202,1 | 4,6 |
| | Otras frondosas y mixtas | 103,0 | 2,4 |
| Total terrenos arbolados | | 2.641,1 | 60,8 |
| Desarbolados | Matral mediterráneo noble | 242,0 | 5,6 |
| | Matrales dispersos | 306,2 | 7,0 |
| | Otras formaciones | 1.156,2 | 26,6 |
| Total terrenos desarbolados | | 1.704,4 | 39,2 |
| Total forestal | | 4.345,5 | 100,0 |

- Agricultural tree crops represent 1,903,330 hectares (1,270,000 non irrigated and 633,000 irrigated) accounting for 52% of the total area of Andalusian agricultural crops.

Valencian Community:

- Pine tree forests are the dominant species into this community space:





Los pinares de pino Laricio y Carrasco predominan en Castellón

- Agricultural woody crops represent 472,075 hectares (230,000 and 242,000 dry irrigation) assuming 72% of the total area of Valencia agrarian cultivations.

Murcia region:

- Regarding pine tree species, both natural forests and reforestation are the dominant forest clearings community space:

Región de Murcia: Características forestales

- Su localización "bio y ecogeográfica" favorece la presencia de **endemismos iberoafricanos**
- Sistemas forestales de los más singulares y significativos del continente europeo
- Diversidad florística con **más de 2.000 especies vegetales**
- Clima típicamente mediterráneo: marcada aridez e irregularidad pluviométrica que favorece las formaciones de matorrales (83% de la superficie forestal):

Entre los **matorrales** se distingue:

- matorral noble (Pistacia, Quercus, Rhamnus, Chamærope, Myrtinus, Arbutus, etc.).
- matorral característico de etapas regresivas (romeral, espartizal, albardinal, tomillar, etc.).

Entre las **formaciones arbóreas** se distinguen:

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

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

- 96% coníferas.
- 4% de frondosas.

Región de Murcia
SUPERFICIE FORESTAL ARBOLADA

| Especie dominante | Superficie(Ha) |
|-------------------------|----------------|
| <i>Pinus halepensis</i> | 233.401 |
| <i>Pinus nigra</i> | 14.095 |
| <i>Pinus pinaster</i> | 13.047 |
| Otras coníferas | 45.574 |
| Total | 306.116 |
| Quercus | 11.176 |
| Total | 316.292 |

- Agricultural tree crops represent 189,229 ha (99,000 rainfed and irrigated 90,000) accounting for 47% of the total area of agricultural crops Murcia.

Castilla la Mancha:

- According to the government of Castilla La Mancha, regarding vegetation pine tree forests reach 37% of the forest area of the Community. The following are superficially oak trees forests with 19% of surface:

| Principales formaciones forestales | Superficie (ha) |
|---|------------------|
| Pinares | 1.016.235 |
| Encinares | 507.440 |
| Bosques adehesados | 266.803 |
| Melojares, quejigares y alcornocales | 258.814 |
| Quercíneas con sabinas y enebros | 161.749 |
| Bosques mixtos de pinos, quercíneas y sabinas | 140.743 |
| Sabinares y enebrales | 113.869 |
| Bosques de ribera | 39.150 |
| Matorral con arbolado escaso | 234.794 |
| Matorral, pastizal y herbazal | 825.182 |
| Total forestal | 3.564.779 |

- Agricultural woody crops represent 922,933 hectares (745,000 and 177,000 dry irrigation) assuming 24% of the total area of Castilian-La Mancha agricultural crops.

A study by COSE (Spanish Confederation of Forestry Organizations) and published by MAPA in 2013 concluded that the regulations and procedures of Spanish surveillance carried out by the Autonomous Communities are consistent and ensure the legality of logging. In it it states that the degree of control by the forestry authority is high or very high in all autonomous regions except in Galicia, where it is considered the level of media control, asserting that there is no risk that the extraction undeclared wood has a significant size. The Spanish Constitution distributes powers between the different administrations, leaving the forest management in the hands of the AUTONOMOUS COMMUNITIES.

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| | <p>Forestry Law (Law 43/2003 of 21 November, Forestry, Law 10/2006 of 28 April, Law 21/2015, of 20 July, amending Law 43/2003 - Consolidation Act) is a basic law in its Chapter IV- Forestry activity states that:</p> <ul style="list-style-type: none"> • Where a management plan or equivalent or the forest is included within the scope of a PORF (Management Plans Forest Resources), the holder must notify the competent body of the Autonomous Community before harvesting. • In other cases (where there is no management plan or similar) administrative approval is required before harvesting. <p>In the case of public forests managed by public Administration (public property) must exist an internal approval of the Forest Service of the CA (Autonomous Community).</p> <p>Each CA develops models and processes, there is considerable variability among them.</p> <p>Consequently, whether Novalis is responsible for the work as if you have purchased the materials to another company responsible for the work, it will be available or have access to one of these documents, together with the data obtained at the entrance of each truck into the forest (they waybill, heavy, etc.), in order to ensure that the origin of the raw material is known and can be, therefore tracked:</p> <ul style="list-style-type: none"> ▪ Job Notification / utilization ▪ Work permit / use (cutting license) ▪ Forest awarding public works ▪ Agreement / supply contract in the case of agricultural equipment <p>Novalis has a management system in which in an Excel file (Control Biomass inputs) all information is included for each of the trucks with raw material (chips) coming into port: date, data from the truck, heavy, source material, and humidity provider.</p> <p>The material, once it is brought to port facilities for storage, is heavy on the official scale of the port.</p> <p>Based on the above, the relative risk is classified like “low risk” under this indicator.</p> |
| Means of VERIFICATION | <ul style="list-style-type: none"> • Excel file: Biomass Control Entries with information on origin, species, supplier, carrier; • They waybill input port of the material • It must have one of the following documents: <ul style="list-style-type: none"> ✓ Job Notification / utilization ✓ Work permits ✓ Forest Works from tenders in public works ✓ Agreement / supply contract in the case of agricultural equipment |
| Evidence REVIEWED | <p>National Risk Assessment FSC Spain, FSC-NRA-ES V1-1 ES_2018-09-11:https://ic.fsc.org/en/document-center/id/309</p> <p>Study on timber control procedures and risk assessment in each Autonomous Community for the application of the Due Diligence System:https://www.mapa.gob.es/es/desarrollo-rural/temas/politica-forestal/control_cortas_de_madera_espanya_2012_tcm30-152390.pdf</p> <p>Forests law: http://www.boe.es/boe/dias/2015/07/21/pdfs/BOE-A-2015-8146.pdf</p> <p>Statistical Yearbook 2017</p> <p>MAP:https://www.mapa.gob.es/estadistica/pags/anuario/2017/CAPITULOS_TOTALES/AE17-C03.pdf</p> <p>Excel file Biomass Control Entries</p> |

Focusing on sustainable sourcing solutions



| | |
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| | Documentation provided by Novalis on contracts |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

| | Indicator |
|-------------------------------|---|
| 1.1.3 | The feedstock input profile is described and categorised by the mix of inputs. |
| Finding | <p>System management Novalis recorded in the Excel file Control Biomass inputs, with the information provided by port operators, each truck that arrives in port with wood chips from forest or agricultural jobs (direct transport forest/land to port): specie, origin and quantity of transported material.</p> <p>With these data can adequately describe as required by the display profile of the raw material:</p> <ul style="list-style-type: none"> ○ Feedstock primary (forestry or agricultural raw material), since the chipping is carried out, mainly at origin and sporadically in storing areas at the ports. When trading the biofuels, Novalis makes an identification or segregation of species. Also differentiation into the holds of transport ships is done for the CoC FSC / PEFC wood chips or logs. <p>Based on the above, the relative risk is classified like "low risk" under this indicator.</p> |
| Means of VERIFICATION | <ul style="list-style-type: none"> • Excel file: Biomass Control Entries with information on origin, species, supplier, carrier |
| Evidence REVIEWED | Excel file Biomass Control Entries |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

| | Indicator |
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| 1.2.1 | The Biomass Producer has implemented appropriate control systems and procedures to ensure that legality of ownership and land use can be demonstrated for the Supply Base. |
| Finding | <p>In the National Risk Assessment FSC Spain: FSC-NRA-ES V1-1 ES_2018-09-11 which it states: "The rights of ownership and use of land are covered by Spanish law and the authorities have implemented tools to record and track tenure rights and land use. Since ancient times, these rights have had a lot of social and economic relevance, so they are fully developed and recognized. Examples of tenure rights and use of the relevant land for the Spanish context include, but are not limited to: survey and marking of public forests, land registration and ownership, boundaries (such as property markers) in small private property, etc. "</p> <p>Spain has a higher value to 50 in the Corruption Perceptions Index of Transparenci International, a value of 58 in 2018, and although the value has fallen since 2012 (was 65), there are reports that significantly link corruption in the forestry industry. Governance level can be classified as robust, both regarding the proof of ownership as the land use. There is no evidence of significant magnitude conflicts related to ownership of forest land or legitimacy for use.</p> <p>They have identified some minor issues or conflicts, mostly local, that are known and can be addressed through legal channels. Examples of this are:</p> <ul style="list-style-type: none"> ○ Conflicts with easements or roads for public use. ○ Brownfield unclaimed by descendants (linked to emigration). ○ Documentation supporting unregistered property, old documents or accreditation by immemorial use. Especially linked to the small property. |

- Different levels of knowledge of property boundaries.
- Conflicts with consortiums.

There is, in other hand, legislation protecting the use of the land. Forest land are classified as rustic in urban planning and there is legislation that protects them from use change.

Regarding the regime owned forests in the 4 AUTONOMOUS COMMUNITIES included in the scope.

Andalusia:

- Clearly dominates the private forests representing a 73.4% of the surface, while public forests represent 26.6% of the area. The public space is divided practically half between belonging to the Andalusian or the State and Local Authorities. Regarding private forests in IFN3 (3rd National Forests Inventory) big majority (3,140,386 hectares) are classified as doubtful or unknown property. However, they have not been found or news reports of problems arising from this classification.

Valencian Community:

- Forest predominantly private except in the province of Valencia where the public dominates.
"In Valencia 55.2% of forest land owned by privates, 38.6% are publicly owned and 6.2% ownership is unknown.
Public ownership is mainly distributed between municipalities, having three quarters of forest land public (76%), with a smaller proportion in the hands of the Government (15.4%) and other local entities (8.5%) .
Forest land of Valencia is characterized by being dominated by a private smallholding (more than half of private surface is formed by lower holdings to 1 ha) which also is strongly linked and interconnected with agricultural use. "

Murcia region:

- clearly dominates the private forests that represents 70% of the forest area murciana. 30% of public forest, 60% owned by local entities and 40% to the regional or central administration.

Castilla la Mancha:

- Regarding the ownership clearly dominates the private forests which represents 76% of the forest area Manchego Castilian. 24% of public forest, 55% owned by local entities and 45% to the regional or central administration.

Taking into account what has been stated in the indicator 1.1.2 on the high level of government control over forest management and planning can conclude that the fact that a particular covered by an authorization for a forestry work one field implies that there is legitimacy on the use of that land.

Agricultural land are private and are cataloged in rustic. In them, before accepting the material, it verified that the source farm residual agricultural biomass is ground effectively classified as agricultural, rejecting source material agricultural residual farms where cataloging the ground is different from the land.

This preliminary check is done by its location and consultation in the land (<https://www.sedecatastro.gob.es/>) And / or GIS PAC (<http://sigpac.mapa.es/feaga/visor/>). In both Web services can be checked very easily growing to the case, and most importantly, it's about websites officers are updated routinely and determine rights (eg precepción aid PAC) so they are reliable.

On the other hand, Novalis is a legally established company registered in the Companies Register of Sevilla, on January 28, 2013, in Volume 5625, Book 0, Folio 84, Section 8, Sheet SE 95877,

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| | <p>inscription 2. In addition, NOVALIS is certified PEFC CoC (PEFC / 14-31-00135-NP, NC-PEFC / COC-031273) and FSC (NC-COC / CW-031 273).</p> <p>Based on the above, the relative risk this is classified indicator is “low risk”.</p> |
| Mean s of VERI FICA TION | <ul style="list-style-type: none"> • Excel file: Biomass Control Entries with information on origin, species, supplier, carrier; • It must have one of the following documents: <ul style="list-style-type: none"> ✓ Job notification / logging ✓ Work permits / logging ✓ Forest awarding public works ✓ Agreement / supply contract in the case of agricultural equipment • Contract / Award with the owner / manager of land • Verification classified as agricultural land in Cadastral or SigPac • Verification classification as irrigated agricultural land in Cadastral or SigPac |
| Evide nce REVI EWE D | <p>National Risk Assessment FSC Spain, FSC-NRA-ES V1-1 ES_2018-09-11: https://ic.fsc.org/en/document-center/id/309</p> <p>Study on timber control procedures and risk assessment in each Autonomous Community for the application of the Due Diligence System: https://www.mapa.gob.es/es/desarrollo-rural/temas/politica-forestal/control_cortas_de_madera_espanya_2012_tcm30-152390.pdf</p> <p>Montes law: http://www.boe.es/boe/dias/2015/07/21/pdfs/BOE-A-2015-8146.pdf</p> <p>Transparency International, Corruption Perceptions Index 2018: https://www.transparency.org/cpi2018</p> <p>Ecological Transition Ministry, Miteco:</p> <ul style="list-style-type: none"> • Forestry statistics: https://www.miteco.gob.es/es/biodiversidad/estadisticas/ • Third National Forest Inventory: https://www.miteco.gob.es/es/biodiversidad/servicios/banco-datos-naturaleza/informacion-disponible/ifn3.aspx <p>Plan Forestal Andaluz: http://www.juntadeandalucia.es/medioambiente/site/portalweb/menuitem.7e1cf46ddf59bb227a9ebe205510e1ca/?vgnextoid=b53a30a2faa74010VgnVCM1000000624e50aRCRD&vgnnextchannel=da72f8c39aeb5310VgnVCM2000000624e50aRCRD</p> <p>Natural Environment Conservation Plan Castilla La Mancha: https://www.castillalamancha.es/gobierno/agrimedambydesrur/estructura/dgapfyen/actuaciones/plan-de-conservación-del-medio-natural</p> <p>Territorial Forestry Action Plan of Valencia: http://www.agroambient.gva.es/auto/montes-bosques/PATFOR/01_MEMORIA/PATFOR_Memoria_version_final.pdf</p> <p>Forestry Strategy Murcia: http://www.murcianatural.carm.es/c/document_library/get_file?uuid=5881e6f2-95c7-46da-8dc5-60ff6d4af1f5&groupId=14</p> <p>Real Estate Registry Viewer: https://www1.sedecatastro.gob.es/Cartografia/mapa.aspx</p> <p>Viewfinders SIGPAC:</p> <ul style="list-style-type: none"> • MAP: http://sigpac.mapama.gob.es/fega/visor/ • Andalusia: http://ws128.juntadeandalucia.es/agriculturaypesca/sigpac/index.xhtml • Murcia region: https://sigpac.carm.es/VisorSigpac2017/# • Valencian Community: http://sigpac.gva.es/visor/ • Castilla La Mancha: http://sigpac.jccm.es/visorsigpachtml5/ |
| Risk Ratin g | <p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p> |
| Com ment or Mitiga tion Meas ure | |

| | Indicator |
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| 1.3.1 | <p>The BP has implemented appropriate control systems and procedures to ensure that feedstock is legally harvested and supplied and is in compliance with EUTR legality requirements.</p> |
| Findings | <p>A study by COSE (Spanish Confederation of Forestry Organizations) and published by MAPA in 2013 concluded that the regulations and procedures of Spanish surveillance carried out by the Autonomous Communities are consistent and ensure the legality of logging. That study states that the degree of control by the forestry authority is high or very high in all autonomous regions except in Galicia, where it is considered the level of media control, asserting that there is no risk that the extraction undeclared wood has a significant size.</p> <p>Each AUTONOMOUS COMMUNITIES develops its own legislation and models for both public tenders and for permits and authorizations for works and forestry.</p> <p>Documentación</p> <hr/> <ul style="list-style-type: none"> ▶ Solicitud según modelo normalizado ▶ Plano Plano de situación catastral o del recinto SIGPAC que indique la zona de actuación. ▶ Declaración responsable Solamente para el aprovechamiento de la madera. La declaración responsable se enviará, por correo electrónico, a siguiente dirección: politicaforestal@carm.es ▶ Justificante del pago de la tasa Solamente en el caso de aprovechamiento de madera y leñas, una vez comprobada la viabilidad del aprovechamiento por los técnicos se deberá abonar la tasa previamente a la resolución del procedimiento. <p>In this respect, whether Novalis is responsible for the work as if Novalis have purchased the materials to another company responsible for the forest works, there will be one of these 3 documents to verify the legality of the use and compliance with the requirements of the EUTR for forest raw material:</p> <ul style="list-style-type: none"> ▪ Job Notification / harvesting ▪ Work permit / harvesting ▪ Forest awarding public forests <p>The agricultural raw material does not require any documentation at legal level and applies the EUTR regulations.</p> <p>Novalis has a management system in which for each of the work the necessary information documented through the procedure NCC-IT-003 DILIGENCE certification system in Chain Custody FSC and PEFC (both systems are integrated).</p> <p>Based on the above, the relative risk is classified like “low risk” for this indicator.</p> |
| Means of VERIFICATION | <ul style="list-style-type: none"> • Novalis records of files for each job including the procedure of Material Supply Controlled certification by FSC Chain of Custody • It must have one of the following documents: <ul style="list-style-type: none"> ✓ Job Notification / harvesting ✓ Work permit / harvesting ✓ Forest awarding public forests |
| Evidence REVIEWED | <p>National Risk Assessment FSC Spain, FSC-NRA-ES V1-1 ES_2018-09-11: https://ic.fsc.org/en/document-center/id/309</p> <p>Study on timber control procedures and risk assessment in each Autonomous Community for the application of the Due Diligence System: https://www.mapa.gob.es/es/desarrollo-rural/temas/politica-forestal/control_cortas_de_madera_espanya_2012_tcm30-152390.pdf</p> <p>Competent authorities, EUTR: https://www.mapa.gob.es/es/desarrollo-rural/temas/politica-forestal/autoridades_competentes_eutr_tcm30-152385.pdf</p> <p>Andalusia:</p> |

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| | <ul style="list-style-type: none"> Model application for authorization. Trees and / or reeds cuttings:http://www.juntadeandalucia.es/medioambiente/portal_web/administracion_electronica/Tramites/Agua/Autorizaciones/Autorizaciones/Modelos/corte_arboles_canas.pdf Ministry of Agriculture, Livestock, Fisheries and Sustainable Development, EUTR:http://www.juntadeandalucia.es/medioambiente/site/portalweb/menuitem.7e1cf46ddf59bb227a9ebe205510e1ca/?vgnextoid=8101b10e7fcb3510VgnVCM2000000624e50aRCRD&vgnnextchannel=632dee9b421f4310VgnVCM2000000624e50aRCRD <p>Valencian Community:</p> <ul style="list-style-type: none"> Application forms forest harvesting Valencia: http://www.agroambient.gva.es/web/medio-natural/aprovechamientos-forestales3 Generalitat Valenciana, EUTR:http://www.agroambient.gva.es/es/web/medio-natural/trazabilidad-de-la-madera <p>Murcia region:</p> <ul style="list-style-type: none"> Authorization for the use of forest species on private farms: https://www.carm.es/web/pagina?IDCONTENIDO=5481&IDTIPO=240&RASTRO=c672\$m2469 <p>Castilla la Mancha:</p> <ul style="list-style-type: none"> Forestry Achievement communication:https://www.jccm.es/tramitesygestiones/comunicacion-de-aprovechamiento-forestal Forest Exploitation Authorization:https://www.jccm.es/tramitesygestiones/autorizacion-de-aprovechamiento-forestal Short communication: https://www.jccm.es/tramitesygestiones/comunicacion-de-corta EUTR:https://www.castillalamancha.es/gobierno/agrimedambydesrur/estructura/dgapfyen/actuaciones/regulación-del-comercio-de-la-madera |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

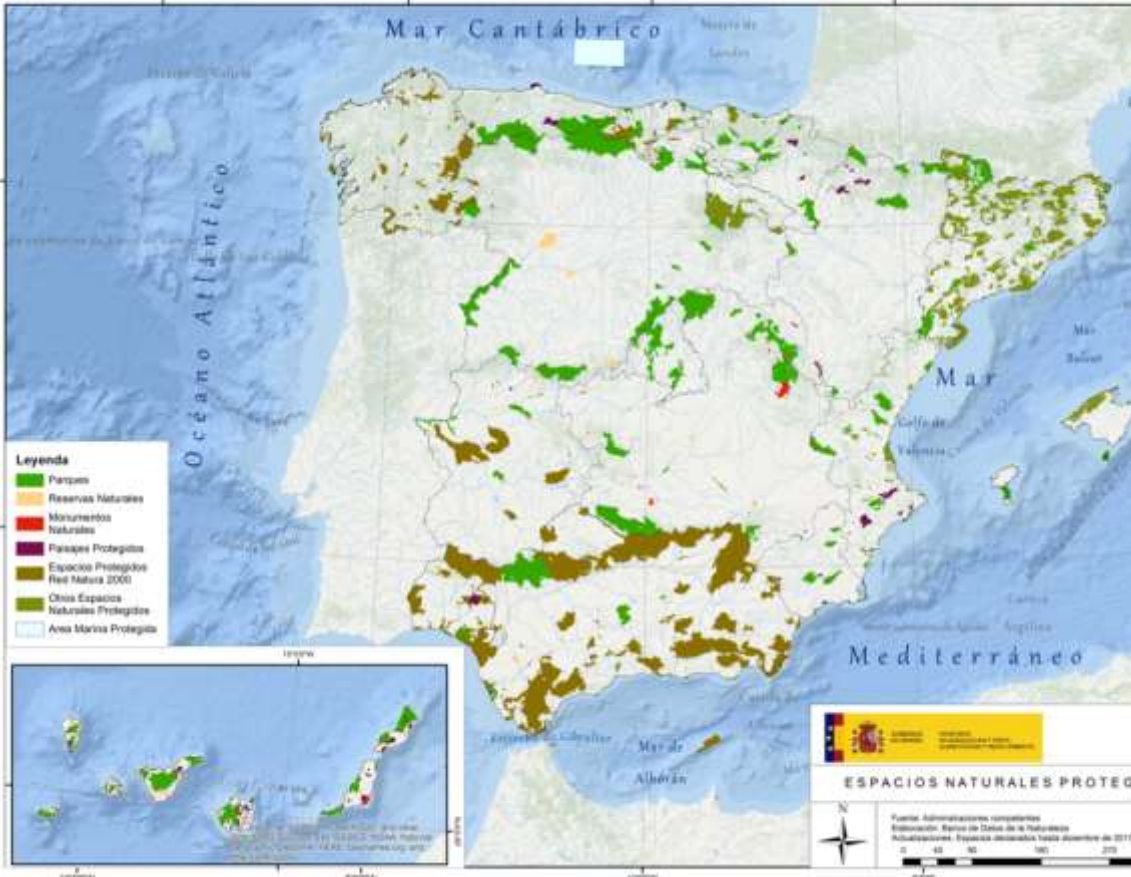
| | Indicator |
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| 1.4.1 | The Biomass Producer has implemented appropriate control systems and procedures to verify that payments for harvest rights and timber, including duties, relevant royalties and taxes related to timber harvesting, are complete and up to date. |
| Finding | There are two types of fees to be paid: 1) timber harvesting rates imposed by the AUTONOMOUS COMMUNITIES in the licenses needed for the work / harvesting in private forests. Each AUTONOMOUS COMMUNITIES regulate this area independently. In case there are fees, issuance of the authorization is only possible after payment. |

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| | <p>In public adjudications are associated payments to the award to do effective once awarded the work before final formalization.</p> <p>In all cases, the fact of authorizations or awards issued by the government involves having paid the corresponding fees previously.</p> <p>Therefore, payment of the required fees for arranging credited:</p> <ul style="list-style-type: none"> ▪ Job Notification / harvesting ▪ Work permit / harvesting ▪ Forest awarding public forests <p>In agricultural land no fees are payable for harvesting.</p> <p>2) VAT linked transactions and subsequently income tax or / and societies. VAT is paid to the Treasury quarterly income tax and / or companies annually.</p> <p>Payment of taxes is credited to the Public Treasury for the purchase of material origin through:</p> <ol style="list-style-type: none"> a) valid invoice or receipt of purchase of the raw material has given rise to the feedstock or the work performed (Considering that often works with auto billing, so that it is buying the company that issues the invoice) b) Certificate of being current on payment to Estate (national and regional) of the company that bought the material or performed the work. <p>Based on the above, the relative risk is classified like "low risk" under this indicator.</p> |
| Means of VERIFICATION | <ul style="list-style-type: none"> • Invoices / receipts for purchase valid (considering that often works with auto billing, so that it is buying the company that issues the invoice) • Certificate of being current payment to the Treasury, state and regional. • It must have one of the following documents: <ul style="list-style-type: none"> ✓ Job Notification / harvesting ✓ Work permit / harvesting ✓ Forest awarding public works ✓ Agreement / supply contract in the case of agricultural equipment |
| Evidence REVIEWED | <p>Basic Tax Tax Agency regulations: https://www.agenciatributaria.es/AEAT.internet/Inicio/La_Agencia_Tributaria/Normativa/Normativa_tributaria_y_aduanera/Impuestos/Impuesto_sobre_el_valor_anadido_IVA_/Impuesto_sobre_el_valor_anadido_IVA_.shtml</p> <p>Basic income tax regulations Tax Agency: https://www.agenciatributaria.es/AEAT.internet/Inicio/La_Agencia_Tributaria/Normativa/Normativa_tributaria_y_aduanera/Impuestos/Impuesto_sobre_la_renta_de_las_personas_fisicas_IRPF_/Normativa_basica_del_IRPF/Normativa_basica_del_IRPF.shtml</p> <p>Basic rules Corporate Tax Tax Agency: https://www.agenciatributaria.es/AEAT.internet/Inicio/La_Agencia_Tributaria/Normativa/Normativa_tributaria_y_aduanera/Impuestos/Impuesto_sobre_sociedades/Normativa_basica_de_impuesto_sobre_sociedades.shtml</p> |
| Risk Rating | <p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p> |
| Comment or Mitigation Measure | |

| | Indicator |
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| 1.5.1 | The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is supplied in compliance with the requirements of CITES. |
| Finding | No in the list of CITES species produced any plant or tree species cultivated in Spain. None of the species of the list of Novalis is within CITES species, Appendices I II or III. Based on the above, the relative risk is classified under this indicator. |
| Means of VERIFICATION | <ul style="list-style-type: none"> List of species included in the raw material |
| Evidence REVIEWED | <p>Check list of CITES species: http://checklist.cites.org/#/en</p> <p>Portal of the CITES Management Authority in Spain: http://www.cites.es/es-ES/Paginas/default.aspx</p> <p>CITES law enforcement: http://www.cites.es/es-ES/legislacion/Paginas/Legislacion-de-aplicacion.aspx</p> |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

| | Indicator |
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| 1.6.1 | The Biomass Producer has implemented appropriate control systems and procedures to ensure that feedstock is not sourced from areas where there are violations of traditional or civil rights. |
| Finding | <p>Spain does not exist in any armed conflict. Spain has no sanctions or prohibitions by UN on the export of wood or chips, and no persons or entities in the Spanish forestry were sanctioned by the UN.</p> <p>Spain is well positioned in international reports:</p> <ul style="list-style-type: none"> Corruption Perception Index value of 58. The perception of the level of corruption has increased substantially in Spain in recent years, although it remains well above 50, which implies a relatively low level of perception; Governance Indicators World Bank (WGI), 2017 values between 61.90 and 83.17 (1-100points). The WGI report of the World Bank is carried out in 200 countries since 1996 and covers the following indicators of governance: i) Accountability, ii) Political Stability and Absence of Violence / Terrorism, iii) Effectiveness of the government, iv) Regulatory Quality, v) rule of law, and vi) Control of corruption. (I) Voice and Accountability, ii) Political Stability and Absence of Violence / Terrorism, iii) Government Effectiveness, iv) Regulatory Quality, v) Rule of Law, and vi) Control of Corruption.) <p>On the other hand, there are some concerns about civil rights in Spain reflected in reports by international organizations such as Amnesty International, see the 2017 report on Spain. None of the concerns is directly related to the forestry sector nor pruning works and replacement of fruit trees in crops where agricultural wood chips is produced. In agriculture there is some perception of the existence of abuses or lack of protection of</p> |

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| | <p>workers, especially immigrants, linked to greenhouse and intensive agricultural production areas (mostly arable area) reflected regularly in the media.</p> <p>Spain does not appear in any reports of international organizations (Global Witness; Chattham House Illegal Logging portal) regarding trade and illegal harvesting of timber.</p> <p>No indigenous people in Spain who can claim traditional land use, forests and other resources based on customary or traditional use rights. They exist in Spain many customary rights linked to the forests that come from antiquity. No relevant conflicts related to these rights and where there is no established channels for their management and resolution. Many of these uses have been extinguished by disuse or simply exist but are not exercised, and others have been integrated into the management of forests (public roads, firewood, community management ...).</p> <p>An example of these uses are community forests, both Roman and Germanic, which have been recovering since the establishment of democracy in 1977. Where communities have demonstrated a use for the common neighbors have declared "Montes Vecinales". There exist Neighborhood Forest Boards and legislation governing their activity. There are many forest or other associations, local or regional level, which perform an important job in recovery or maintenance of customary uses of the forests.</p> <p>On agricultural land they are private and have associated public roads beyond customary uses.</p> <p>Spain has ratified ILO Fundamental Conventions 8.</p> <p>Based on the above, the relative risk is classified like "low risk" under this indicator.</p> |
| Means of VERIFICATION | <ul style="list-style-type: none"> • If there traditional land rights of local populations they are identified • There are clear procedures and channels to resolve possible conflicts with traditional land rights of local populations |
| Evidence REVIEWED | <p>National Risk Assessment FSC Spain, FSC-NRA-ES V1-0 ES_2018-09-11:https://ic.fsc.org/en/document-center/id/309</p> <p>Governance Indicators World Bank WGI: http://info.worldbank.org/governance/WGI/#reports</p> <p>Transparency International, Corruption Perceptions Index 2018: https://www.transparency.org/cpi2018</p> <p>Amnesty International Spain: https://www.es.amnesty.org/en-que-estamos/espana/</p> <p>Illegal Logging Portal:https://www.illegal-logging.info/regions/spain</p> <p>Global Witness:https://www.globalwitness.org/en/</p> <p>ILO Spain:http://www.ilo.org/madrid/oit-en-espa%C3%B1a/lang-es/index.htm</p> <p>ILO Conventions:http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang-es/index.htm</p> <p>Spanish legislation Labor and Social Security:https://www.boe.es/legislacion/codigos/codigo.php?id=93&modo=1-a=0&tab=2</p> |
| Risk Rating | <p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p> |
| Comment or Mitigation Measure | |

| | Indicator |
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| 2.1.1 | <p>The Biomass Producer has implemented appropriate control systems and procedures for verifying that forests and other areas with high conservation values are identified and mapped.</p> |
| Findings | <p>In Spain there is a systematic legal framework for the protection of natural areas and areas with high conservation values: "According to the Law 42/2007 of Natural Heritage and Biodiversity, Are considered areas Natural Protected those areas of the country, including inland waters and marine waters under national sovereignty or jurisdiction, including the exclusive economic zone and the continental shelf, which meet at the least one of the following requirements and are declared as such:</p> <ul style="list-style-type: none"> • Systems contain natural elements or representative, unique, fragile, threatened or of special ecological, scientific, scenic, geological or educational. • They are especially dedicated to the protection and maintenance of biological diversity, geodiversity and natural and associated cultural resources. " <p>There are many figures and denominations since most of the Autonomous Community have legislated on this issue: National Parks, Nature Parks, Nature Reserves, Natura 2000 network areas, Biosphere Reserves. The protected area in Spain accounts for 13% for natural spaces and reaches 28% including the Natura 2000 network, Spain is the largest contributor to the Red Natura 2000, the main instrument of European conservation policy. Protected areas cover both public and private forests.</p>  <p>Use any activity that could affect rare or endangered species have specified limitations on the use permit.</p> <p>According to Databank nature of the Miteco:</p> <ul style="list-style-type: none"> • Andalusia has declared June 2018, 341 protected areas, both terrestrial and marine, with the land area under protection of 2,614,899.84 hectares, almost 30% of its land area. |

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| | <ul style="list-style-type: none"> Valencia has declared June 2018, 292 protected areas, both terrestrial and marine, with the land area under protection of 255,281.90 hectares, almost 11% of its land area. Murcia has declared June 2018, 14 protected areas, both terrestrial and marine, with the land area under protection of 62,104.27 hectares, 5.49% of its land area. Castilla La Mancha has declared June 2018, 111 protected sites being the land area under protection of 582,929.30 hectares, 7.34% of its surface. <p>In addition, there are high conservation values related to cultural goods and prehistoric sites. The Iberian Peninsula is an area with lots of archaeological and prehistoric sites. There is legislation, both state and the AUTONOMOUS COMMUNITIES, which protects goods and catalogs of historical and cultural interest. In the AUTONOMOUS COMMUNITIES that require prior authorization and this includes any condition to a good of interest and measures or restrictions on the work they are needed. In case of previous communications, if the area is affected by either of these characteristics is necessary to have the relevant authorization heritage. It is also legislated the acting process if during the forest jobs any remains appear.</p> <p>There is a good level of governance and a comprehensive legal framework developed for areas Spanish protected, and a good level of control by the autonomous communities, which are the competent authorities, regional governments have a wealth of information both web pages and viewers and geographic information systems (GIS) on protected areas and priority ecosystems, habitats, protected wildlife and endangered species that are properly identified and mapped</p> <p>Therefore, the following guidelines for action regarding the identification and delineation of high conservation values is established:</p> <ul style="list-style-type: none"> For forest works in public forest management on the services of the AUTONOMOUS COMMUNITIES in charge of management have all the information necessary for identification and mapping. Any limitation related to managing them is communicated in the award itself. To work on private lands with it's required a prior authorization for any forestry work, the public Administration staff managing the AUTONOMOUS COMMUNITIES are who must do work of identification and delimitation of the attributes of high conservation value such that their presence and consequent management constraints are reflected in the authorization issued. To work on private farms with Management Plan approved by the competent authority, since they have yet the approved planning, it's sufficient, work identification and delimitation is in the approved management plan and work done are to adhere to it there indicated. For materials from agricultural areas can use the same mapping available in the case of the forests. For these materials, Novalis will check viewers GIS information available if the lands in which they will work overlaps with a high conservation value (cross parcel with layers of information on Natura 2000 areas Natural Protected, Real Interest Cultural). <p>Based on the above, the relative risk this indicator is classified as "low risk" in the defined scope, forestry works, agricultural prunings and exchanging fruit trees crops in the AUTONOMOUS COMMUNITIES of Andalusia, Valencia, Murcia and Castilla La Mancha.</p> |
| Means of VERIFICATION | <ul style="list-style-type: none"> Available information on high conservation values in GIS viewers of the Autonomous Communities (Red Natura 2000, Protected Areas, Cultural Assets Interest) Existing legal framework. Laws, regulations and public control organizations Protected and endangered species listings. Work permits / logging required permissions Catalog of cultural assets. SIG viewfinders Technical Specification for the award of public forest work |
| Evidence REVIEWED | <p>Law 42/2007 of Natural Heritage and Biodiversity: http://www.boe.es/diario_boe/txt.php?id=BOE-A-2007-21490</p> <p>Miteco:</p> <ul style="list-style-type: none"> Protected areas Spain: https://www.miteco.gob.es/es/biodiversidad/temas/espacios-protegidos/espacios-naturales-protegidos/ Bank Nature Data, Protected Areas Spain: https://www.miteco.gob.es/es/biodiversidad/servicios/banco-datos-naturaleza/informacion-disponible/ENP_Descargas.aspx#prettyPhoto |

- Spain map Protected Areas: [https://www.miteco.gob.es/es/biodiversidad/servicios/banco-datos-naturaleza/informacion-disponible/ENP_Descargas.aspx#prettyPhoto\[pp_gal\]/0/](https://www.miteco.gob.es/es/biodiversidad/servicios/banco-datos-naturaleza/informacion-disponible/ENP_Descargas.aspx#prettyPhoto[pp_gal]/0/)
 - National Parks GIS layers: <https://www.miteco.gob.es/es/red-parques-nacionales/sig/>
- Law 16/1985 of 25 June, on Spanish Historical Heritage:
<https://www.boe.es/buscar/pdf/1985/BOE-A-1985-12534-consolidado.pdf>
- Junta de Andalucía:
- Protected Areas Network of Andalusia (RENPA):
<http://www.juntadeandalucia.es/medioambiente/site/portalweb/menuitem.f497978fb79f8c757163ed105510e1ca/?vgnextoid=007fee9b421f4310VgnVCM2000000624e50aRCRD&vgnextchannel=3bdd61ea5c0f4310VgnVCM1000001325e50aRCRD>
 - Natura 2000:
<http://www.juntadeandalucia.es/medioambiente/site/portalweb/menuitem.f497978fb79f8c757163ed105510e1ca/?vgnextoid=d2d5f92658274410VgnVCM1000001325e50aRCRD&vgnextchannel=d0e77b32b31f4310VgnVCM1000001325e50aRCRD>
 - RENPA viewer: http://www.juntadeandalucia.es/medioambiente/site/rediam/menuitem.04dc44281e5d53cf8ca78ca731525ea0/?vgnextoid=b2460c33f6959210VgnVCM1000001325e50aRCRD&vgnextchannel=66ffdb27eb364410VgnVCM1000001325e50aRCRD&vgnextfmt=rediam&lr=la_ng_es
 - Visor Red Natura 2000 (LIC, SPAs and SACs) in Andalusia:
http://www.juntadeandalucia.es/medioambiente/site/rediam/menuitem.04dc44281e5d53cf8ca78ca731525ea0/?vgnextoid=cf7b1cab5bf59210VgnVCM1000001325e50aRCRD&vgnextchannel=66ffdb27eb364410VgnVCM1000001325e50aRCRD&vgnextfmt=rediam&lr=la_ng_es
 - Downloads Environmental Information:
http://www.juntadeandalucia.es/medioambiente/site/rediam/menuitem.aedc2250f6db83cf8ca78ca731525ea0/?vgnextoid=7b3ba7215670f210VgnVCM1000001325e50aRCRD&lr=la_ng_es
- Valencian Community:
- Natural Protected Areas: <http://www.agroambient.gva.es/es/web/medio-natural/espacios-naturales-protegidos>
 - Natura 2000: <http://www.agroambient.gva.es/web/natura-2000>
 - Cartographic viewer CV: <http://visor.gva.es/visor/>
- Murcia region:
- Protected Natural Areas Murcia: <http://www.murcianatural.carm.es/web/guest/espacios-naturales-protegidos>
 - Cartographic viewer OISMA: <https://geoportal.imida.es/oisma/>
- Castilla la Mancha:
- Natural Protected Areas List:
http://pagina.jccm.es/medioambiente/espacios_naturales/listado.htm
 - Protected areas Castilla La Mancha: <http://areasprotegidas.castillalamancha.es>
 - Cartographic viewer: <https://castillalamancha.maps.arcgis.com/apps/webappviewer/index.html?id=9dbc9704759b4e51ad6a405e740b5289>
- Royal Decree 139/2011 List of Wild Species in Special Protection Regime and Spanish Catalog of Threatened Species: <https://www.boe.es/buscar/pdf/2011/BOE-A-2011-3582-consolidado.pdf>
- Current situation of the Wild Species Listed in Special Protection Regime and Spanish Catalog of Threatened Species: <https://www.miteco.gob.es/es/biodiversidad/temas/conservacion-de-especies/especies-proteccion-especial/ce-proteccion-listado-situacion.aspx>
- Wikipedia, protected natural areas Spain:
https://es.wikipedia.org/wiki/Anexo:Espacios_naturales_protegidos_de_España
- Europarc 2016 yearbook of the state of protected areas in Spain:
http://www.redeuroparc.org/system/files/shared/Publicaciones/Anuario_2016/anuario_2016_europarc-espana.pdf
- National Risk Assessment FSC Spain, FSC-NRA-ES V1-1 ES_2018-09-11: <https://ic.fsc.org/en/document-center/id/309>

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

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| 2.1.2 | The Biomass Producer has implemented appropriate control systems and procedures to identify and address potential threats to forests and other areas with high conservation values from forest management activities. |
| Finding | <p>From the description given in the previous indicator, it's concluded that there is a real effective framework that allows the identification and mapping of high conservation values present. In addition, the report REVIEWED and prepared by COSE and published by MAPA in 2013 indicates that the degree of control by the forestry authority is high or very high in all autonomous regions except in Galicia, where it is considered the level of Middle control. The study concludes that the Spanish legislation and monitoring procedures carried out by the Autonomous Communities are consistent. The Autonomous Communities have their own staff to perform control over high conservation values, Agents Forest / Environmental. In addition it exists within the Guardia Civil SEPRONA (Nature Protection Service) that performs environmental police. There are no published reports of significant environmental damage linked to the activities of work / silvicultural uses. Exists, With the above information, the following guide to action with respect to identifying and addressing potential threats to high conservation values is established:</p> <ol style="list-style-type: none"> 1. For working in public forests, the services of the CA management in charge of management have all the necessary information that will be reflected in the specifications of the job. Any limitation related to the management potential threats to high values is communicated in the award itself. 2. To work on private lands requiring prior authorization for any forestry works, public services staff who are managing the AUTONOMOUS COMMUNITIES are doing the work of identification and delimitation of the attributes of high conservation value such that their presence and consequent management constraints are reflected in the authorization issued. 3. To work on private lands with Management Plan approved by the competent authority, any simple notification to the reflected work on the approved planning is sufficient, the work of identification and delimitation is into the approved management plan and any jobs must take into account what is indicated in the plan. 4. For any forestry works not performed under the responsibility of Novalis (it is considered that the work done by subcontractors themselves are under the responsibility of Novalis), ie where Novalis is just buying the wood chips. The level of control by the AUTONOMOUS COMMUNITIES is maintained and Novalis must perform adequate control to ensure compliance. 5. Regarding materials from agricultural areas Novalis has to carry out on protection figures (Red Natura 2000, Natural Park ...) related to High Conservation Values. <p>Based on the above, the relative risk this indicator is classified as:</p> |

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| | <ul style="list-style-type: none"> low for forestry works activities in public forests and private estates that require prior authorization. specified in forestry activities on private farms with Management Plan (notification is sufficient) specified in unexecuted jobs under the responsibility of Novalis, specified for agricultural material from tree crops (agricultural prunings and species exchange) |
| Means of VERIFICATION | <ul style="list-style-type: none"> Available information on high conservation values in GIS viewers of the Autonomous Communities (Red Natura 2000, Protected Areas, Cultural Assets Interest) Existing legal framework. Laws, regulations and control organizations. Protected and endangered species listings. Work permits / logging required permissions Technical Specification for the award of public forest jobs. Manual good environmental practices in Sustainable Forest Management. |
| Evidence REVIEWED | <p>Law 42/2007 of Natural Heritage and Biodiversity: http://www.boe.es/diario_boe/txt.php?id=BOE-A-2007-21490</p> <p>Miteco:</p> <ul style="list-style-type: none"> Protected areas Spain: https://www.miteco.gob.es/es/biodiversidad/temas/espacios-protegidos/espacios-naturales-protegidos/ Bank Nature Data, Protected Areas Spain: https://www.miteco.gob.es/es/biodiversidad/servicios/banco-datos-naturaleza/informacion-disponible/ENP_Descargas.aspx#prettyPhoto Spain map Protected Areas: https://www.miteco.gob.es/es/biodiversidad/servicios/banco-datos-naturaleza/informacion-disponible/ENP_Descargas.aspx#prettyPhoto[pp_gal]/0/ National Parks GIS layers: https://www.miteco.gob.es/es/red-parques-nacionales/sig/ <p>Law 16/1985 of 25 June, on Spanish Historical Heritage: https://www.boe.es/buscar/pdf/1985/BOE-A-1985-12534-consolidado.pdf</p> <p>Junta de Andalucía:</p> <ul style="list-style-type: none"> Protected Areas Network of Andalusia (RENPA): http://www.juntadeandalucia.es/medioambiente/site/porta/web/menuitem.f497978fb79f8c757163ed105510e1ca/?vgnnextoid=007fee9b421f4310VgnVCM2000000624e50aRCRD&vgnnextchannel=3bdd61ea5c0f4310VgnVCM1000001325e50aRCRD Natura 2000: http://www.juntadeandalucia.es/medioambiente/site/porta/web/menuitem.f497978fb79f8c757163ed105510e1ca/?vgnnextoid=d2d5f92658274410VgnVCM1000001325e50aRCRD&vgnnextchannel=d0e77b32b31f4310VgnVCM1000001325e50aRCRD RENPA viewer: http://www.juntadeandalucia.es/medioambiente/site/rediam/menuitem.04dc44281e5d53cf8ca78ca731525ea0/?vgnnextoid=b2460c33f6959210VgnVCM1000001325e50aRCRD&vgnnextchannel=66ffdb27eb364410VgnVCM1000001325e50aRCRD&vgnnextfmt=rediam&lr=la_ng_es Visor Red Natura 2000 (LIC, SPAs and SACs) in Andalusia: http://www.juntadeandalucia.es/medioambiente/site/rediam/menuitem.04dc44281e5d53cf8ca78ca731525ea0/?vgnnextoid=cf7b1cab5bf59210VgnVCM1000001325e50aRCRD&vgnnextchannel=66ffdb27eb364410VgnVCM1000001325e50aRCRD&vgnnextfmt=rediam&lr=la_ng_es Downloads Environmental Information: http://www.juntadeandalucia.es/medioambiente/site/rediam/menuitem.aedc2250f6db83cf8ca78ca731525ea0/?vgnnextoid=7b3ba7215670f210VgnVCM1000001325e50aRCRD&lr=la_ng_es <p>Valencian Community:</p> <ul style="list-style-type: none"> Natural Protected Areas: http://www.agroambient.gva.es/es/web/medio-natural/espacios-naturales-protegidos Natura 2000: http://www.agroambient.gva.es/web/natura-2000 Cartographic viewer CV: http://visor.gva.es/visor/ <p>Murcia region:</p> <ul style="list-style-type: none"> Protected Natural Areas Murcia: http://www.murcianatural.carm.es/web/guest/espacios-naturales-protegidos |

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| | <ul style="list-style-type: none"> • Cartographic viewer OISMA: https://geoportal.imida.es/oisma/ <p>Castilla la Mancha:</p> <ul style="list-style-type: none"> • Natural Protected Areas List: http://pagina.jccm.es/medioambiente/espacios_naturales/listado.htm • Protected areas Castilla La Mancha: http://areasprotegidas.castillalamancha.es • Cartographic viewer: https://castillalamancha.maps.arcgis.com/apps/webappviewer/index.html?id=9dbc9704759b4e51ad6a405e740b5289 <p>Royal Decree 139/2011 List of Wild Species in Special Protection Regime and Spanish Catalog of Threatened Species: https://www.boe.es/buscar/pdf/2011/BOE-A-2011-3582-consolidado.pdf</p> <p>Current situation of the Wild Species Listed in Special Protection Regime and Spanish Catalog of Threatened Species: https://www.miteco.gob.es/es/biodiversidad/temas/conservacion-de-especies/especies-proteccion-especial/ce-proteccion-listado-situacion.aspx</p> <p>Wikipedia, protected natural areas Spain: https://es.wikipedia.org/wiki/Anexo:Espacios_naturales_protegidos_de_España</p> <p>Europarc 2016 yearbook of the state of protected areas in Spain: http://www.redeuroparc.org/system/files/shared/Publicaciones/Anuario_2016/anuario_2016_europarc-espana.pdf</p> <p>National Risk Assessment FSC Spain, FSC-NRA-ES V1-1 ES_2018-09-11: https://ic.fsc.org/en/document-center/id/309</p> <p>Study on timber control procedures and risk assessment in each Autonomous Community for the application of the Due Diligence System: https://www.mapa.gob.es/es/desarrollo-rural/temas/politica-forestal/control_cortas_de_madera_espanya_2012_tcm30-152390.pdf</p> |
| Risk Rating | <input type="checkbox"/> low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | <p>In each of the cases in which specified risk defined, Novalis:</p> <ol style="list-style-type: none"> 1. To work on private lands with Management Plan approved by the competent authority, where a notification is sufficient, Novalis will ensure that proceedings are restricted as specified in the Management Plan, in order to protect the highest values possible threats when executing jobs. 2. For work not performed under the responsibility of Novalis (where Novalis buy wood chips), the system implemented by Novalis allows to know the origin of the raw material and also agreements with the seller the right of access is indicated to relevant information from work; contract, cutting permit, authorizations ... In addition, Novalis transmits to its suppliers clear instructions for action in case of possible identify threats to high conservation values and avoid potential threats to the environment or particularly sensitive areas. 3. For materials from agricultural areas, Novalis is checkin the viewports GIS information available for the land in which they will work to check if it overlaps with a high conservation value (cross parcel with layers of information on Natura 2000 areas Protected Natural Areas, Goods Cultural interest). <p>If positive:</p> <ul style="list-style-type: none"> ✓ the attribute that characterizes the high conservation value is identified, ✓ It is noted in the record of the work, ✓ investigates on his appearance or not in the work area ✓ in case of appearance, it is verified that has not been damaged before accepting the material |

| | Indicator |
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| 2.1.3 | <p>The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not sourced from forests converted to production plantation forest or non-forest lands after January 2008.</p> |
| Findings | <p><u>Conversion of forest to plantation:</u></p> <p>This is a situation (short of an indigenous mass and planting fast-growing species in intensive management) that can theoretically be within the scope of Supply based on private property in Andalusia (eucalyptus).</p> <p>However, the Andalusian includes eucalyptus as exotic invasive in the Andalusian Program for the Control of Invasive Alien Species. Since 1992 they are taking steps to address the task of recovering public forests surfaces occupied by eucalyptus plantations. Since that date, eucalyptus is not used in reforestation in public forests and have recovered thousands of hectares of eucalyptus in public forests of Andalusia.</p> <p>On the other hand, the area of eucalyptus in the province of Huelva, has been reduced since 1989 from 234,000 hectares to 140,000 hectares. In addition, the pulp mill in Huelva, first destination of the wood of this species has been closed and stopped production. If we add all that to the high level of control over the actions in the natural environment of the Junta de Andalucía we can rule out any relevant transformations of mass replacement of native eucalyptus since 2008 in Andalusia.</p> <p><u>Changing forest use to non-forest.</u></p> <p>Authorization changes of forest use is regulated at the state level by Law 43/2003 on Forestry modified by Law 10/2006 of April 28 and 21/2015, of 20 July, indicating in Article 40, dedicated of change of forest use and modification of vegetation cover: "the change of forest use of a forest when they come for reasons of general interest, without prejudice to the provisions of Article 18.4 and the applicable environmental regulations, have character outstanding and will require a favorable report from the forestry competent and, where appropriate organ of the holder of the forest "</p> <p>Further this defines in Law Article 6. the concept of change of forest use as "any physical act or administrative act that makes losing forest his capacity as such".</p> <p>Therefore, it is something that requires exceptional authorization of the competent authorities. Normally, the change to agricultural use may be allowed in plots those who have had a previous agricultural use, over a period of 10-30 years. In other types of change it is authorized only in cases of particular public interest.</p> <p>This is something that does not affect the type of forest, tree stands consolidated, which Novalis is working in.</p> <p>It is also important to note that biofuels made from transformations of forest to non-forest uses can not be included in the feedstock SBP.</p> <p><u>Andalusia:</u></p> <p>Andalusian rules in use changes are regulated by Law 2/1992 of 15 June, Forest of Andalusia, which in Article 69 states: "The change of use of forest land for agricultural crops or other authorization required forest Forestry Administration, regardless of ownership of land, without prejudice to the other required permits or licenses. " You there public information about the changes authorized by the province since 2006</p> <p>(http://www.juntadeandalucia.es/medioambiente/site/portalweb/menuitem.7e1cf46ddf59bb227a9ebe205510e1ca/?vgnextoid=e8a36e8366862510VgnVCM2000000624e50aRCRD&vgnnextchannel=8b0b6e8366862510VgnVCM2000000624e50aRCRD)</p> <p><u>Valencian Community:</u></p> |

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| | <p>At the same time, in the Autonomous Community of Valencia, changes to agricultural use from forestry use must be authorized by the General Directorate of Natural Environment. There is public information available about the changes authorized with an area of 1200 ha (http://www.agroambient.gva.es/es/web/medio-natural/cartografia-forestal).</p> <p><u>Murcia:</u></p> <p>Also in the region of Murcia the clearing of forest lands, outside of protected areas, for agricultural cultivation requires approval by the General Directorate of the natural. There is a model for this specific application (https://www.carm.es/web/pagina?IDCONTENIDO=7122&IDTIPO=240&TASAS=S&RASTRO=c672\$m2469#informacionTasas).</p> <p><u>Castilla la Mancha:</u></p> <p>Like in other communities these transformations requires an approval by the Directorate General Policy Forestry and Natural Areas. There is a specific model where the documentation to be presented is included, for continuous surfaces, or very close, over 5 Ha, a project signed by technical competent is required, and it must contains at least, forestry study, study of crop to be introduced, economic study and environmental impact study. https://www.jccm.es/tramitesygestiones/transformacion-en-agricola-de-un-terreno-forestal-en-regimen-general</p> <p>It is therefore concluded that there is a clear legal framework that regulates both transformations of native forests (prohibition), such as forest uses to non-forest (prior authorization).</p> <p>The risk related to this indicator is classified as “low risk” for forestry activities in public tenders and in private forests of the AUTONOMOUS COMMUNITIES of Andalusia, Valencia, Murcia and Castilla La Mancha.</p> |
| Mean s of VERI FICA TION | <ul style="list-style-type: none"> • Review of orthophotos from previous flights to 2008. • Existing legal framework. Laws, regulations and public control organizations • Authorization of forestry jobs • Available mapping and consultation with the competent staff of the AUTONOMOUS COMMUNITIES in transformations • Management Plan development project • Agreements and contracts signed |
| Evide nce REVI EWE D | <p>Forest consolidated text Act (Law 43/2003 on Forestry modified by Law 10/2006 of April 28 and 21/2015, of 20 July): https://www.boe.es/buscar/act.php?id=BOE-A-2003-21339</p> <p>Law 2/1992 of 15 June, Forest of Andalusia: https://www.boe.es/buscar/act.php?id=BOE-A-1992-15996</p> <p>Elimination of eucalyptus crops in public forests, Junta de Andalucía: http://www.juntadeandalucia.es/medioambiente/site/portaaweb/menuitem.7e1cf46ddf59bb227a9ebe205510e1ca?vgnextoid=4cb4453f8678a210VgnVCM2000000624e50aRCRD&vgnnextchannel=c192af8569fb5310VgnVCM2000000624e50aRCRD</p> <p>Law 5/2014 of 25 July, of the Generalitat, Ordination of the Territory, Urbanism and Landscape of Valencia, consolidated text: https://www.boe.es/buscar/pdf/2014/BOE-A-2014-9625-consolidado.pdf</p> <p>Law 3/1993, of 9 December, of the Generalitat Valenciana, Forest of Valencia, consolidated text: http://www.dogv.gva.es/auto/dogv/docvpub/rlgv/1993/L_1993_03_ca_L_2017_21.pdf</p> <p>Mapping and database agricultural transformations of forest land of Valencia: http://www.agroambient.gva.es/documents/20551003/162281880/Manual+cartograf%C3%ADa+Transformaciones_V9+Junio+2017.pdf/4c435927-8743-43e1-aace-db6a4ee083f8</p> <p>Tax Measures Law 8/2014, Administrative Simplification and in Public Administration, Region of Murcia: https://www.boe.es/boe/dias/2014/12/23/pdfs/BOE-A-2014-13369.pdf</p> <p>Law 3/2008 of 12 June, Forestry and Sustainable Forest Management of Castilla-La Mancha: https://www.boe.es/buscar/act.php?id=BOE-A-2008-13685&p=20091223&tn=2</p> |

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| | Castilla la Mancha: https://www.jccm.es/tramitesygestiones/transformacion-en-agricola-de-un-terreno-forestal-en-regimen-general |
| Risk Rating | <input checked="" type="checkbox"/> Specified Risk Low Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

| | Indicator |
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| 2.2.1 | The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them. |
| Finding | <p>Under current legislation, both at state and regional level, forestry activities with certain characteristics and certain size must have an environmental impact report prior to the license application (opening new tracks, reforestations...).</p> <p>The environmental impacts of harvesting activities on the ground or watercourses are well regulated in Spanish legislation. The Autonomous Communities have their own staff to perform control. It also exists, within the Guardia Civil, the SEPRONA (Nature Protection Service) that performs environmental police. There are no published reports of significant environmental damage linked to the activities of silvicultural works.</p> <p>Furthermore, Novalis has an implemented system with the following elements in order to minimize potential impacts in the work:</p> <ul style="list-style-type: none"> ✓ Manual of good practices in GFS, recommended behaviors for own workers and workers subcontracted companies. ✓ Guide sheets for forestry works, full document used in forest works ✓ Guide sheets for Forestry Equipment Management, comprehensive document used in forest works. ✓ When Novalis is buying wood chips from other suppliers, and therefore works in the forest are not under their responsibility, agreements with its suppliers are including the right to access all information relevant to the matter. <p>In the case of the agricultural materials, they use to be linked to annual jobs (pruning) or occasional (fruit tree exchanges) in the management of agricultural woody crops. specific analysis for the use of such products is not considered necessary.</p> <p>Based on the above, the relative risk is classified "low risk" under this indicator.</p> |
| Means of VERIFICATION | <ul style="list-style-type: none"> • Existing legal framework. Laws, regulations and public control organizations • Technical Specification for the award of public forest works • Proposed action, if any • Environmental assessment report, if available • Manual of good practices in GFS • Guide sheets for Forestry Jobs • Guide sheets for Forestry Equipment Management |

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| | <ul style="list-style-type: none"> • Contracts with suppliers • Information received from suppliers on environmental assessment work • Assessment of potential impacts at the level of work. • Evaluation of measures taken to minimize impacts • Monitoring results |
| Evidence REVIEWED | <p>Environmental Assessment legislation: https://www.miteco.gob.es/es/calidad-y-evaluacion-ambiental/temas/evaluacion-ambiental/legislacion/</p> <p>Law 21/2013 Environmental Assessment: https://www.miteco.gob.es/es/calidad-y-evaluacion-ambiental/Ley%20%2021%202013%20de%20Evaluacion%20Ambiental_tcm30-190698.pdf</p> <p>Guides and guidelines for environmental assessment: https://www.miteco.gob.es/es/calidad-y-evaluacion-ambiental/temas/evaluacion-ambiental/guias-directrices/</p> <p>Spanish Association of Environmental Assessment:</p> <ul style="list-style-type: none"> • Spanish Association of Environmental Impact Assessment http://www.eia.es • national legislation: http://www.eia.es/nacional/ • AUTONOMOUS COMMUNITIES legislation: http://www.eia.es/autonomica/ |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

| | Indicator |
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| 2.2.2 | The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b). |
| Finding | <p>Desertification is the biggest problem which is faced by Spanish soils. Soil erosion is one of the determinants of the advance of desertification in Spain and is a particularly important environmental problem in most of the Mediterranean area.</p> <p>According to the map of the Soil Erosive States (1987-2001) in which the USLE_USDA methodology, soil formation process reaches a rate varying between 2 and 12 tonnes per hectare per year. However, 24% of the national territory (12,382,984 ha) loses more than 12 tonnes per hectare per year and 12.3% (6,217,830 ha) does at a rate of 50 tonnes per hectare per year. These six million hectares with severe erosive processes are located mostly within watershed Mediterranean-continental climate, mainly in the basins of the southern river Guadalquivir, and also Ebro, Tajo and Júcar rivers.</p> <p>The annual loss of soil in Spain is valued at more than 1,200 million tons. 27% of these losses occur in forest area (334 million tons), corresponding to the agricultural sector the rest (887 million tons). Given that the forestry extension exceeds agricultural extension, it is clear that the highest rates of erosion per unit occur in areas dedicated to agricultural crops.</p> <p>In forest areas, most soil loss occurs in the area occupied by bushes and scrub (19.1 t/ha and year), scattered bushes and low density trees areas thin (FCC <20%), with a average of 17.5 t/ha per year.</p> <p>Novalis carries out improvement of forests lands by selvicultural works.</p> <p>According to the above information it can be established that forest jobs do not damage the soil significantly and that in the framework of forest management procedures, also when maintaining an adequate environmental and forest management is not expected significant damage to soils.</p> <p>In addition, the areas most affected by soil loss (Mediterranean area) are those where the level of control by the competent authorities is greater according to the report by COSE and published by MAPA in 2013.</p> <p>Jobs that generate forest biomass for Novalis, are considered controversial only at the level of risk to soil, the clearcutting of eucalyptus tree plantations in Andalusia on slopes greater than 30%.</p> <p>Based on the above, the relative risk this indicator is classified as:</p> <ol style="list-style-type: none"> 1. "Low risk" in forest corks on pine tree forests and eucalyptus tree plantations in slopes lower to 30% 2. specified in clear cuttings in eucalyptus tree plantations at slopes greater than 30% 3. specified for biomass produced on agricultural lands |
| Means of VERIFICATION | <ul style="list-style-type: none"> • Existing legal framework. Laws, regulations and public control organizations • Available maps of risk of erosion and desertification • Manual of good practices in GFS • Guide sheets for Forestry Jobs • Guide sheets for Forestry Equipment Management • Guide shieets for conditionality for UE agricultural management • Report previous visit to the farm that is origin of agricultural wood chips |
| Evidence REVIEWED | <p>Montes consolidated text Act (Law 43/2003 on Forestry modified by Law 10/2006 of April 28 and 21/2015, of 20 July): https://www.boe.es/buscar/act.php?id=BOE-A-2003-21339</p> <p>Law 2/1992 of 15 June, Forest of Andalusia: https://www.boe.es/buscar/act.php?id=BOE-A-1992-15996</p> <p>Law 3/1993, of 9 December, of the Generalitat Valenciana, Forest of Valencia, consolidated text: http://www.dogv.qva.es/auto/dogv/docvpub/rlqv/1993/L_1993_03_ca_L_2017_21.pdf</p> |

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| | <p>Law 3/2008 of 12 June, Forestry and Sustainable Forest Management of Castilla-La Mancha: https://www.boe.es/buscar/act.php?id=BOE-A-2008-13685&p=20091223&tn=2</p> <p>MAP: National Inventory of Soil Erosion (INES): https://www.mapa.gob.es/es/desarrollo-rural/temas/politica-forestal/inventario-cartografia/inventario-nacional-erosion-suelos/</p> <p>MAPA, the National Action Program to Combat Desertification (PAND): https://www.mapa.gob.es/es/desarrollo-rural/temas/politica-forestal/desertificacion-restauracion-forestal/lucha-contra-la-desertificacion/lch_pand_descargas.aspx</p> <p>Spanish Forest Science Society:</p> <ul style="list-style-type: none"> • Progress Report of forests and forestry (ISFE) in Spain 2013: http://secforestales.org/content/informe-isfe • ISFE 2017 progress report: http://secforestales.org/sites/default/files/archivos/7cfe_avance_isfe_final.pdf <p>General basic law of conditionality, PAC: https://www.mapa.gob.es/es/ministerio/servicios/informacion/plataforma-de-conocimiento-para-el-medio-rural-y-pesquero/observatorio-de-buenas-practicas/guia-de-la-conditionality/default.aspx</p> <p>Earnings limit cultivation and pasture. Definition from the experiences of the IFIE: https://www.mapa.gob.es/es/desarrollo-rural/temas/politica-forestal/0904712280144daa_tcm30-152678.pdf</p> |
| Risk Rating | <p><input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk Unspecified Risk at RA <input type="checkbox"/></p> |
| Comment or Mitigation Measure | <p>For any Eucalyptus plantations in Andalusia, usually, the Administration when providing the cutting licenses is establishing limits on works to prevent any risk to the quality and soil structure. Specifically, one of the measures that are commonly set in high slopes areas is to forbid stumps removals to thereby secure the grip of the ground.</p> <p>In any case, for the biomasses coming from clearcuts of eucalyptus tree plantations in lands with slopes over 30%, Novalis will ensure that all specifications / limitations set forth in the license are followed and damages to soil are avoided.</p> <p>Furthermore, for biomass wood chips coming from any agricultural origin like by-products from annual prunings or occasional change of species in fruit trees crops, Novalis will not accept biomass coming from lands with slopes higher than 15%. Additionally it adopts the criterion agricultural biomass reject any farm that in the previous visit, show clear signs of erosion.</p> |

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| 2.2.3 | The Biomass Producer has implemented appropriate control systems and procedures to ensure that key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b). |
| Finding | As set forth in indicators 2.1.1. and 2.1.2. in Spain there is a systematic legal framework for the protection of natural areas and areas with high conservation values: "According to the Law 42/2007 of Natural Heritage and Biodiversity, they are considered like Natural Protected those areas of the country, including inland waters and marine waters under national sovereignty or jurisdiction, including the exclusive economic zone and the continental shelf, which meet at the least one of the following requirements and are declared as such: |

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| | <ul style="list-style-type: none"> Systems contain natural elements or representative, unique, fragile, threatened or of special ecological, scientific, scenic, geological or educational. They are especially dedicated to the protection and maintenance of biological diversity, geo-diversity and natural and associated cultural resources. " <p>There are many figures and denominations since most of the Autonomous Communities have legislated on this issue: National Parks, Nature Parks, Nature Reserves, Areas of Natura 2000, Biosphere Reserves ... The protected area in Spain accounts for 13% for spaces natural and reaches 28% including the Natura 2000 network, Spain is the largest contributor to the Red Natura 2000, the main instrument of European conservation policy. Protected areas cover both public and private forests.</p> <p>There is a good level of governance and a comprehensive legal framework developed for Spanish protected areas. In addition, the report REVIEWED and prepared by COSE and published by MAPA in 2013 indicates that the degree of control by the forestry authority is high or very high in all autonomous regions except in Galicia, where it is considered a Medium level of control. The study concludes that the Spanish legislation and monitoring procedures carried out by the Autonomous Communities are consistent. The Autonomous Communities have their own staff to perform control over high conservation values, named Forest Agents or Environmental Agents. Further it exists within the Guardia Civil corp, the SEPRONA (Nature Protection Service) that performs environmental police. There are no published reports of significant environmental damage linked to the activities of silvicultural works. In all cases there is a clear legal framework and effective control by the authorities of the potential threats on high conservation values.</p> <p>Use any activity that could affect rare or endangered species have specified limitations on the use permit. In addition, the ACs have a wealth of information both web pages and viewers and geographic information systems (GIS) on protected areas, priority ecosystems and habitats (Natura 2000) ...</p> <p>For materials coming from agricultural areas it es necessary to see if there are some kind of protection (Natura 2000 Natural Park ...) linked to some high conservation value restriction involving management and, in that case, it it has been fulfilled.</p> <p>With this information the relative risk is classified like "low risk" under this indicator.</p> |
| Means of VERIFICATION | <ul style="list-style-type: none"> Available information on high conservation values in GIS viewers of the Autonomous Communities (Red Natura 2000, Protected Areas, Cultural Assets Interest) Existing legal framework. Laws, regulations and public control organizations Protected and endangered species listings. Work / logging permits Technical Specification for the award of public forest tenders Manual good environmental practices in Sustainable Forest Management <p>Results of verification audits of Novallis</p> |
| Evidence REVIEWED | <p>Law 42/2007 of Natural Heritage and Biodiversity: http://www.boe.es/diario_boe/txt.php?id=BOE-A-2007-21490</p> <p>Miteco:</p> <ul style="list-style-type: none"> Protected areas Spain: https://www.miteco.gob.es/es/biodiversidad/temas/espacios-protegidos/espacios-naturales-protegidos/ Spain map protected areas: https://www.miteco.gob.es/es/biodiversidad/servicios/banco-datos-naturaleza/mapaenp2018_tcm30-195782.pdf National Parks GIS layers: https://www.miteco.gob.es/es/red-parques-nacionales/sig/ <p>Junta de Andalucía:</p> <ul style="list-style-type: none"> Protected Areas Network of Andalusia (RENPA): http://www.juntadeandalucia.es/medioambiente/site/porta/web/menuitem.f497978fb79f8c757163ed105510e1ca/?vgnnextoid=007fee9b421f4310VgnVCM2000000624e50aRCD&vgnnextchannel=3bdd61ea5c0f4310VgnVCM1000001325e50aRCD Natura 2000: http://www.juntadeandalucia.es/medioambiente/site/porta/web/menuitem.f497978fb79f8c757163ed105510e1ca/?vgnnextoid=d2d5f92658274410VgnVCM1000001325e50aRCD&vgnnextchannel=d0e77b32b31f4310VgnVCM1000001325e50aRCD RENPA viewer: http://www.juntadeandalucia.es/medioambiente/site/rediam/menuitem.04dc44281e |

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| | <p>5d53cf8ca78ca731525ea0/?vgnnextoid=b2460c33f6959210VgnVCM1000001325e50aRCRD&</p> <ul style="list-style-type: none"> • Visor Red Natura 2000 (LIC, SPAs and SACs) in Andalusia: http://www.juntadeandalucia.es/medioambiente/site/rediam/menuitem.04dc44281e5d53cf8ca78ca731525ea0/?vgnnextoid=cf7b1cab5bf59210VgnVCM1000001325e50aRCRD&vgnextchannel=66ffdb27eb364410VgnVCM1000001325e50aRCRD&vgnnextfmt=rediam&lr=la ng_es • Downloads Environmental Information: http://www.juntadeandalucia.es/medioambiente/site/rediam/menuitem.aedc2250f6db83cf8ca78ca731525ea0/?vgnnextoid=7b3ba7215670f210VgnVCM1000001325e50aRCRD&lr=la ng_es <p>Valencian Community:</p> <ul style="list-style-type: none"> • Natural Protected Areas:http://www.agroambient.gva.es/es/web/medio-natural/espacios-naturales-protegidos • Natura 2000:http://www.agroambient.gva.es/web/natura-2000 • Cartographic viewer CV:http://visor.gva.es/visor/ <p>Murcia region:</p> <ul style="list-style-type: none"> • Protected Natural Areas Murcia:http://www.murcianatural.carm.es/web/guest/espacios-naturales-protegidos • Cartographic viewer OISMA:https://geoportal.imida.es/oisma/ <p>Castilla la Mancha:</p> <ul style="list-style-type: none"> • Natural Protected Areas List: http://pagina.jccm.es/medioambiente/espacios_naturales/listado.htm • Protected areas Castilla La Mancha:http://areasprotegidas.castillalamancha.es • Cartographic viewer:https://castillalamancha.maps.arcgis.com/apps/webappviewer/index.html?id=9dbc9704759b4e51ad6a405e740b5289 <p>Royal Decree 139/2011 List of Wild Species in Special Protection Regime and Spanish Catalog of Threatened Species: https://www.boe.es/buscar/pdf/2011/BOE-A-2011-3582-consolidado.pdf</p> <p>Current situation of the Wild Species Listed in Special Protection Regime and Spanish Catalog of Threatened Species: https://www.miteco.gob.es/es/biodiversidad/temas/conservacion-de-especies/especies-proteccion-especial/ce-proteccion-listado-situacion.aspx</p> <p>Europarc 2016 yearbook of the state of protected areas in Spain: http://www.redeuroparc.org/system/files/shared/Publicaciones/Anuario_2016/anuario_2016_europarc-espana.pdf</p> <p>National Risk Assessment FSC Spain, FSC-NRA-ES V1-1 ES_2018-09-11:https://ic.fsc.org/en/document-center/id/309</p> <p>Study on timber control procedures and risk assessment in each Autonomous Community for the application of the Due Diligence System: https://www.mapa.gob.es/es/desarrollo-rural/temas/politica-forestal/control_cortas_de_madera_espanya_2012_tcm30-152390.pdf</p> |
| Risk Rating | <p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p> |
| Comment or Mitigation Measure | |

| | Indicator |
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| 2.2.4 | The Biomass Producer has implemented appropriate control systems and procedures to ensure that biodiversity is protected (CPET S5b). |
| Finding | <p>The concept of biodiversity is linked to the High Conservation Values, that was treated in several earlier indicators, but is wider. Biodiversity could be defined as the variety of life. It encloses the diversity of plants, animals, mushrooms and microorganisms living in a certain space, including their genetic variability of the ecosystems which these species are parts of, also the landscapes or places where ecosystems are located. Also it includes ecological and evolutionary processes that occur at the level of genes, species, ecosystems and landscapes.</p> <p>Spain is one of the most biologically diverse countries in the EU due, among others factors such as its geographical location, its geological diversity, great climatic, orographic and soil variability, paleobiogeographic history or the existence of islands.</p> <p>There is the Law 42/2007 of the Natural Heritage and Biodiversity which establishes the basic legal framework for conservation, sustainable use, enhancement and restoration of the natural heritage and biodiversity establishing a set of tools for knowledge and planning of the natural heritage and biodiversity, such as Spanish Inventory of Natural Heritage and Biodiversity, the Strategic Plan of the Natural Heritage and Biodiversity and the Guidelines for the Management of Natural Resources.</p> <p>As for habitat conservation and natural spaces, it incorporates Marine Protected Areas, and includes provisions on the European Ecological Network Natura 2000 and areas protected by international instruments. Regarding the conservation of wild biodiversity, the law creates the List of Species in Special Protection Regime and the Spanish Catalog of Endangered Species, just like its Catalog for Spanish Invasive Alien Species. It also regulates protection of species in relation to hunting and inland fisheries and the Spanish Hunting and Fishing Inventory is established. Similarly access to genetic resources from wild taxa and sharing of benefits arising from their use is regulated.</p> <p>Creates law also the Fund for Natural Heritage and Biodiversity, co-financing instrument aimed at ensuring territorial cohesion and achieving the objectives of the Act, the State Commission for Natural Heritage and Biodiversity as an advisory body and cooperation between the state and the autonomous communities and the State Council for Natural heritage and biodiversity, as an organ of public participation in the field of conservation and sustainable use of natural heritage and biodiversity.</p> <p>In addition, as discussed in previous indicators in Spain there is a systematic legal framework for the protection and a good level of governance linked to the degree of control by the forestry authority activities in the natural environment is considered high or very high in all autonomous regions except in Galicia, where the it is considered Medium, and Cantabria region, which is considered Medium-high.</p> <p>On the other hand, Novalis has a Manual of Good Practices in GFS and Guide sheets for forestry works and machinery handling, including general rules of action for their workers in the forests with basic mandatory indications to ensure respect for existing biodiversity.</p> <p>Jobs to produce forest biomass for Novalis only are considered controversial at the level of risk to biodiversity, when they are done into private properties for harvesting eucalyptus tree plantations on continuous surfaces exceeding 100 hectares, which can happen within the defined scope, In Andalusia.</p> <p>Biofuels raw materials coming from agricultural areas require checks to ensure compliance with the indicator since the level of involvement in management is null. It is considered, therefore, a risk not specified.</p> <p>Given all the above information relative risk this indicator is classified as:</p> <ol style="list-style-type: none"> 1. "low risk" for forest works activities other than that indicated in the following point 2. specified for forest harvesting on private property in Andalusia into eucalyptus tree plantations with continuous areas above 100 hectares 3. specified for material from agricultural areas |
| Means of | <ul style="list-style-type: none"> • Existing legal framework. Laws, regulations and public control organizations • Protected and endangered species listings. • Technical Specification of awarding work in Forest • Manual of good practices in GFS |

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| VERIFICATION | <ul style="list-style-type: none"> • Guide sheets for Forestry Jobs • Guide sheets for Forestry Equipment Management • Contracts with suppliers • Information received from suppliers on environmental assessment work • Assessment of potential impacts at the level of work and measures taken to minimize impacts • Certificate of Recognition (previous visit to lands) |
| Evidence REVIEWED | <p>Law 42/2007 of Natural Heritage and Biodiversity: https://www.boe.es/buscar/pdf/2007/BOE-A-2007-21490-consolidado.pdf</p> <p>Biodiversity concept: http://www.unesco.org/new/es/office-in-montevideo/natural-sciences/ecological-sciences/mab-lac-themes/biodiversidad/</p> <p>Biodiversity concept: http://www.biodiversidad.gob.mx/biodiversidad/que_es.html</p> <p>Miteco:</p> <ul style="list-style-type: none"> • Protected areas Spain: https://www.miteco.gob.es/es/biodiversidad/temas/espacios-protegidos/espacios-naturales-protegidos/ • Bank Nature Data, Protected Areas Spain: https://www.miteco.gob.es/es/biodiversidad/servicios/banco-datos-naturaleza/informacion-disponible/ENP_Descargas.aspx#prettyPhoto • Spain map Protected Areas: https://www.miteco.gob.es/es/biodiversidad/servicios/banco-datos-naturaleza/informacion-disponible/ENP_Descargas.aspx#prettyPhoto[jp_gal]/0/ • National Parks GIS layers: https://www.miteco.gob.es/es/red-parques-nacionales/sig/ <p>Junta de Andalucía:</p> <ul style="list-style-type: none"> • Protected Areas Network of Andalusia (RENPA): http://www.juntadeandalucia.es/medioambiente/site/portalweb/menuitem.f497978fb79f8c757163ed105510e1ca/?vgnextoid=007fee9b421f4310VgnVCM2000000624e50aRCRD&vgnextchannel=3bdd61ea5c0f4310VgnVCM1000001325e50aRCRD • Natura 2000: http://www.juntadeandalucia.es/medioambiente/site/portalweb/menuitem.f497978fb79f8c757163ed105510e1ca/?vgnextoid=d2d5f92658274410VgnVCM1000001325e50aRCRD&vgnextchannel=d0e77b32b31f4310VgnVCM1000001325e50aRCRD • RENPA viewer: http://www.juntadeandalucia.es/medioambiente/site/rediam/menuitem.04dc44281e5d53cf8ca78ca731525ea0/?vgnextoid=b2460c33f6959210VgnVCM1000001325e50aRCRD& • Visor Red Natura 2000 (LIC, SPAs and SACs) in Andalusia: http://www.juntadeandalucia.es/medioambiente/site/rediam/menuitem.04dc44281e5d53cf8ca78ca731525ea0/?vgnextoid=cf7b1cab5bf59210VgnVCM1000001325e50aRCRD&vgnextchannel=66ffdb27eb364410VgnVCM1000001325e50aRCRD&vgnextfmt=rediam&lr=la ng_es • Downloads Environmental Information: http://www.juntadeandalucia.es/medioambiente/site/rediam/menuitem.aedc2250f6db83cf8ca78ca731525ea0/?vgnextoid=7b3ba7215670f210VgnVCM1000001325e50aRCRD&lr=la ng_es <p>Valencian Community:</p> <ul style="list-style-type: none"> • Natural Protected Areas: http://www.agroambient.gva.es/es/web/medio-natural/espacios-naturales-protegidos • Natura 2000: http://www.agroambient.gva.es/web/natura-2000 • Cartographic viewer CV: http://visor.gva.es/visor/ <p>Murcia region:</p> <ul style="list-style-type: none"> • Protected Natural Areas Murcia: http://www.murcianatural.carm.es/web/guest/espacios-naturales-protegidos • Cartographic viewer OISMA: https://geoportal.imida.es/oisma/ <p>Castilla la Mancha:</p> <ul style="list-style-type: none"> • Natural Protected Areas List: http://pagina.jccm.es/medioambiente/espacios_naturales/listado.htm • Protected areas Castilla La Mancha: http://areasprotegidas.castillalamancha.es |

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| | <ul style="list-style-type: none"> • Cartographic viewer: https://castillalamancha.maps.arcgis.com/apps/webappviewer/index.html?id=9dbc9704759b4e51ad6a405e740b5289 <p>Royal Decree 139/2011 List of Wild Species in Special Protection Regime and Spanish Catalog of Threatened Species: https://www.boe.es/buscar/pdf/2011/BOE-A-2011-3582-consolidado.pdf</p> <p>Current situation of the Wild Species Listed in Special Protection Regime and Spanish Catalog of Threatened Species: https://www.miteco.gob.es/es/biodiversidad/temas/conservacion-de-especies/especies-proteccion-especial/ce-proteccion-listado-situacion.aspx</p> <p>National Risk Assessment FSC Spain, FSC-NRA-ES V1-0 ES_2018-09-11: https://ic.fsc.org/en/document-center/id/309</p> <p>Study on timber control procedures and risk assessment in each Autonomous Community for the application of the Due Diligence System: https://www.mapa.gob.es/es/desarrollo-rural/temas/politica-forestal/control_cortas_de_madera_espanya_2012_tcm30-152390.pdf</p> |
| Risk Rating | <p><input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p> |
| Comment or Mitigation Measure | <p>Eucalyptus tree materials Novalis is working with come from Andalusia region. Usually, the Andalusian forest Administration are limiting, in the cutting licenses, any work that could produce any risk to biodiversity. Specifically, one of the limits provided is to respect any waterways sides as well as any protected species found within the working area.</p> <p>In any case, for any biofuels coming from clearcuts of eucalyptus tree forests with more than 100 hectares of continuous extension, Novalis will ensure that all specifications / limitations set forth in the cutting license have been followed an it has been protected existing biodiversity.</p> <p>To do this, and based on a system already implemented by Novalis, the following steps are established:</p> <ol style="list-style-type: none"> 1. Study of the cutting license to determine the set of limitations on the elements of biodiversity 2. Identify elements of biodiversity protection, if any, in the previous visit to the lands Biodiversity elements can be: riversides, microhabitats, meso habitat, rare species in the surrounding, endangered species, forest boundaries... 3. In case of positive identification, works are limited as necessary measures to protect valuable elements that are present. 4. At the final visit to done jobs, corroboration of respect for the elements to be protected, which will be properly documented in the record of the work <p>In addition, Novalis has mechanisms for transmission of this methodology to its suppliers, in the case of works done by them.</p> <p>For materials coming from agricultural areas, Novalis will check the viewports GIS information available to check if the parts of the lands in which they will work overlaps with a high conservation value (crossing working areas with layers of information on Natura 2000 areas Protected Natural Areas, Goods Cultural interest).</p> <p>If positive:</p> <ul style="list-style-type: none"> ✓ the attribute that characterizes the high conservation value is identified, ✓ It is noted in the record of the work, ✓ investigates on his appearance or not in the work area <p>In case of appearance, it is verified that has not been damaged before accepting the material.</p> |

Indicator

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| 2.2.5 | The Biomass Producer has implemented appropriate control systems and procedures for verifying that the process of residue removal minimises harm to ecosystems. |
| Finding | <p>In this respect it should be noted that there is a clear legal framework and effective and competent authorities exercising their control tasks in Spain. Spanish legislation and monitoring procedures carried out by the Autonomous Communities are consistent. The Autonomous Communities have their own staff to perform control. In addition it exists, within the Civil Guard Corp, the SEPRONA (Nature Protection Service) that performs environmental police.</p> <p>There is the work of final inspection of the administration / owner, which requires that meets the requirements in the specifications or contract with respect to the treatment of waste.</p> <p>Usually, the procedure for waste management is specified in the tender documents Technical Prescriptions, authorizations or agreements governing the execution of the forest works. Most of the Autonomous Communities have their own regulations on the management of forest residues of any job and the activities that are permitted and which are not. In addition, burning of waste requires prior authorization.</p> <p>Novalis carries out development and improvement of forests; the methodology used for the removal of forest residues is crushing. Likewise and its business, much of the forest residues are harvested for biofuels.</p> <p>Furthermore, Novalis has an implemented system with the following elements in order to minimize potential impacts in the works:</p> <ul style="list-style-type: none"> ✓ Manual of good practices in GFS, where are set the behaviors recommended for own workers and workers subcontracted companies ✓ Guide sheets for forestry works full document used in fieldwork ✓ Guide sheets for Forestry Equipment Management, comprehensive document used fieldwork ✓ When Novalis is buying wood chips from other suppliers, and therefore works on the forests are not under their responsibility, they include in agreements with its suppliers the right to access all information relevant to the matter. <p>Regarding the material from byproducts of agricultural management of tree crops, by making into wood chipps the residues, its being used as biofuels a material that otherwise would be burned at the lands, as it used to be until this new use has appeared.</p> <p>There are no published reports of significant environmental damage linked to the activities of work / silvicultural uses, or the use of by-products (pruning / replacement of species) in agricultural woody crops.</p> <p>Based on the above, the relative risk is classified like "low risk" under this indicator.</p> |
| Means of VERIFICATION | <ul style="list-style-type: none"> • Existing legal framework. Laws, regulations and public control organizations • Manual Good environmental practices in Sustainable Forest Management • Guide sheets for forestry jobs • Guide sheets for Forestry Equipment Management • Contracts with suppliers • Information received from suppliers on environmental assessment works • Assessment of potential impacts at the when working at the forests • Evaluation of measures taken to minimize impacts • Monitoring results • Field visits to forest works in progress • Certificate of visit to recognize the lands |
| Evidence REVIEWED | <p>Montes consolidated text Act (Law 43/2003 on Forestry modified by Law 10/2006 of April 28 and 21/2015, of 20 July): https://www.boe.es/buscar/act.php?id=BOE-A-2003-21339</p> <p>Law 2/1992 of 15 June, Forest of Andalusia: https://www.boe.es/buscar/act.php?id=BOE-A-1992-15996</p> <p>Law 3/1993, of 9 December, of the Generalitat Valenciana, Forest of Valencia, consolidated text: http://www.dogv.gva.es/auto/dogv/docvpub/rlgv/1993/L_1993_03_ca_L_2017_21.pdf</p> |

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| | Law 3/2008 of 12 June, Forestry and Sustainable Forest Management of Castilla-La Mancha: https://www.boe.es/buscar/act.php?id=BOE-A-2008-13685&p=20091223&tn=2 Good Practice Guide on Forest Fire Prevention: http://lifeomontevivo.org/docs/guiaprevinforpropfor.pdf Novalis. Environmental management system and forestry |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

| | Indicator |
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| 2.2.6 | The Biomass Producer has implemented appropriate control systems and procedures to verify that negative impacts on ground water, surface water and water downstream from forest management are minimised (CPET S5b). |
| Finding | <p>The forests and proper management have an impact on water resources that is generally positive.</p> <p>Large eucalyptus tree plantations cuttings (hundreds of hectares) have been considered the only type of forest in Andalusia where raw materials within the scope of Novalis are verified under any risk.</p> <p>In respect of the impact of desertification see indicator 2.2.2.</p> <p>Regarding the protection of the headwaters of watersheds see indicator 2.5.2. These areas have usually protective afforestations made by public Administration and which are protected by both state and regional legislation.</p> <p>Regarding agricultural lands management, these present two fundamental problems regarding the impacts on water resources:</p> <ol style="list-style-type: none"> 1. Illegal wells and overexploitation of aquifers. 2. Pollution of groundwater by the use of pesticides, biocides and / or chemicals. <p>In this agricultural areas, they are been collected woody byproducts coming from management of fruit trees plantations that otherwise would be burned.</p> <p>Furthermore, Novalis has an implemented system with the following elements in order to minimize potential impacts in the works:</p> <ul style="list-style-type: none"> ✓ Handbook and code of good environmental practices, recommended behaviors for own workers and workers from subcontractors, which is known by all employees of the company and its subcontractors. This manual describes basic protective measures are developed such as respect of riversides, riverbeds and riparian vegetation, respect for wetlands and small water sources and in the case of the existence of water resources, physical and chemical alterations of water to be avoided and the channels respecting areas public water and avoiding entrainment of materials due to erosion. ✓ Code of Conduct that governs the basic criteria to guide the mode of action of any worker. ✓ Novalis when buying chips from other suppliers, and therefore works on the forests are not under their responsibility, includes into the agreements with its suppliers the right to access all information relevant to the matter. <p>Based on the above, the relative risk this indicator is classified as:</p> <ul style="list-style-type: none"> • “low risk” for forest biomass origin with exception of the following point • specified for the forest-based biomass from cuttings in eucalyptus tree plantations with continuous extension over 100 hectares. • specified for biomass of agricultural origins. |
| Means of VERIFICATION | <ul style="list-style-type: none"> • Existing legal framework. Laws, regulations and public control organizations • Technical Specification of awarding works in Forest • Works permits for logging • Manual of best practices in Sustainable Forest Management • Contracts with suppliers • Information received from suppliers on environmental assessment work • Assessment of potential impacts at the level of work and measures taken to minimize impacts • Monitoring results • Field visits to forest work in progress • Certificate of visit to recognize the lands <p>Verification classification as irrigated agricultural land in Cadastral or SigPac</p> |
| Evidence REVIEWED | Montes consolidated text Act (Law 43/2003 on Forestry modified by Law 10/2006 of April 28 and 21/2015, of 20 July): https://www.boe.es/buscar/act.php?id=BOE-A-2003-21339 |

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| | <p>Law 2/1992 of 15 June, Forest of Andalusia: https://www.boe.es/buscar/act.php?id=BOE-A-1992-15996</p> <p>Law 3/1993, of 9 December, of the Generalitat Valenciana, Forest of Valencia, consolidated text: http://www.dogv.gva.es/auto/dogv/docvpub/rlqv/1993/L_1993_03_ca_L_2017_21.pdf</p> <p>Law 3/2008 of 12 June, Forestry and Sustainable Forest Management of Castilla-La Mancha: https://www.boe.es/buscar/act.php?id=BOE-A-2008-13685&p=20091223&tn=2</p> <p>MAP: National Inventory of Soil Erosion (INES): https://www.mapa.gob.es/es/desarrollo-rural/temas/politica-forestal/inventario-cartografia/inventario-nacional-erosion-suelos/</p> <p>MAPA, the National Action Program to Combat Desertification (PAND): https://www.mapa.gob.es/es/desarrollo-rural/temas/politica-forestal/desertificacion-restauracion-forestal/lucha-contra-la-desertificacion/lch_pand_descargas.aspx</p> <p>Miteco, Legal Framework of Water Planning: https://www.miteco.gob.es/es/agua/legislacion/Marco_normativo_planificacion.aspx</p> <p>Spanish Forest Science Society:</p> <ul style="list-style-type: none"> • Progress Report of forests and forestry (ISFE) in Spain 2013: http://secforestales.org/content/informe-isfe • ISFE 2017 progress report: http://secforestales.org/sites/default/files/archivos/7cfe_avance_isfe_final.pdf <p>Novalis, systems environmental and forest management</p> <p>Real Estate Registry Viewer: https://www1.sedecatastro.gob.es/Cartografia/mapa.aspx</p> <p>Viewfinders SIGPAC:</p> <ul style="list-style-type: none"> • MAP: http://sigpac.mapama.gob.es/feaga/visor/ • Andalusia: http://ws128.juntadeandalucia.es/agriculturaypesca/sigpac/index.xhtml • Murcia region: https://sigpac.carm.es/VisorSigpac2017/# • Valencian Community: http://sigpac.gva.es/visor/ • Castilla La Mancha: http://sigpac.jccm.es/visorsigpachtml5/ |
| Risk Rating | <p><input type="checkbox"/> low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA <input type="checkbox"/></p> |
| Comment or Mitigation Measure | <p>Into the cutting permits that the Andalusian Administration provide for Eucalyptus tree plantations harvestings in Andalusia, usually they are including limitations on works to prevent negative impacts if they could exist. Specifically, one of the measures provided for is respect for the riversides and waterways as well as the impossibility of removing stumps to thereby secure the grip of the terrain and possible effects on the water.</p> <p>In any case, in biofuels coming from clearcuts of eucalyptus tree plantations with more than 100 hectares of extension, Novalis will ensure that all specifications / limitations set in the cutting license are followed and there have not been damaged courses of water. To do this, and based on a system already implemented, the following steps are established:</p> <ol style="list-style-type: none"> 1. Study of cutting license to determine the established limitations on the effects on the water 2. Identify the elements to be protected, if any, in the previous visit to the lands 3. In case of positive identification, works are limited to protect the present elements 4. At the final visit to jobs, it is necessary to corroborate the respect for the elements to be protected, which will be properly documented in the record of the works <p>In addition, Novalis has mechanisms for transmission of this methodology to its suppliers, in the case of works done by them.</p> <p>In the lands that are origin of any agricultural raw material, Novalis corroborates that the lands have a cataloging irrigated plot in any of the webs of land (https://www.sedecatastro.gob.es/) And / or GIS PAC (http://sigpac.mapa.es/feaga/visor/), Which will be verified with the property prior to purchase the material.</p> <p>Novalis has developed an Excel file SBP Agricultural Biomass in which all information check plots of origin of agricultural biomass is registered.</p> |

| | Indicator |
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| 2.2.7 | The Biomass Producer has implemented appropriate control systems and procedures for verifying that air quality is not adversely affected by forest management activities. |
| Finding | <p>In this respect it should be noted that there is a clear legal framework and effective and competent authorities exercising their control tasks in Spain. Spanish legislation and monitoring procedures carried out by the Autonomous Communities are consistent. The Autonomous Communities have their own staff to perform control. In addition it exists within the Civil Guard Corp, the SEPRONA (Nature Protection Service) that performs environmental police. There are no published reports of significant environmental damage linked to the activities of forestry works.</p> <p>The greatest impacts on the quality of the air in the forests are due to forest fires or emissions coming from nearby heavy industries. Neither of the two factors are the result of forestry, pruning, or renovation in fruit trees or olive trees plantations.</p> <p>Regarding the scope of the works performed by Novalis, impacts on air quality could come from machinery emissions used in the works. In this regard, works in any area are not continuous, so its impact are timely.</p> <p>Novalis has an environmental policy with implemented procedures to minimize the emission of air pollutants. In forest works, three main sources of air pollution are identified:</p> <ul style="list-style-type: none"> - Dust <p>To minimize dust, in the working areas, vehicles circulation should be careful in places where dust is generated.</p> <ul style="list-style-type: none"> - Combustion gases machinery and vehicles. <p>To minimize the emission of gases, engines should keep in perfect state of inspection and maintenance and also must be disconnect when it is not necessary to its operation.</p> <ul style="list-style-type: none"> - Incineration of forest residues <p>It must be necessary to look for other forest waste management methodologies than incineration, avoiding the emission of combustion gases, such as grinding.</p> <p>Furthermore, Novalis has an implemented system with the following elements in order to minimize potential impacts in the works:</p> <ul style="list-style-type: none"> ✓ Handbook and code of good environmental practices, with recommended behaviors for own workers and workers from subcontractors, which is known by all employees of the company and its subcontractors. ✓ Code of Conduct that governs the basic criteria to guide the mode of action of any worker. ✓ Novalis when buying chips from other suppliers, and therefore work on the forests are not under their responsibility, includes into any agreements with its suppliers the right to access all information relevant to the matter. <p>Based on the above, the relative risk is classified like “low risk” under this indicator.</p> |
| Means of VERIFICATION | <ul style="list-style-type: none"> • Existing legal framework. Laws, regulations and public control organizations • Manual of best practices in Sustainable Forest Management. • Contracts with suppliers • Information received from suppliers on environmental assessment work • Assessment of potential impacts at the level of work and measures taken to minimize impacts • Monitoring results |
| Evidence REVIEWED | Miteco, air quality, standards: https://www.miteco.gob.es/es/calidad-y-evaluacion-ambiental/temas/atmosfera-y-calidad-del-aire/calidad-del-aire/normativa/ |

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| | Law 34/2007 of 15 November on air quality and atmospheric protection: https://www.boe.es/buscar/pdf/2007/BOE-A-2007-19744-consolidado.pdf Novalis. Environmental management system and forestry |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

| | Indicator |
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| 2.2.8 | The Biomass Producer has implemented appropriate control systems and procedures for verifying that there is controlled and appropriate use of chemicals, and that Integrated Pest Management (IPM) is implemented wherever possible in forest management activities (CPET S5c). |
| Finding | <p>In this respect it should be noted that there is a clear legal framework and effective and competent authorities exercising their control tasks in Spain. Spanish legislation and monitoring procedures carried out by the Autonomous Communities are consistent. The Autonomous Communities have their own staff to perform control. In addition it exists within the Civil Guard Corp, the SEPRONA (Nature Protection Service) that performs environmental police. There are no published reports of significant environmental damage by using chemicals activities related to silvicultural works.</p> <p>In order to apply biocides and chemical agents it is necessary to have a license issued by an organization that is recognized by the competent authority and it is also mandatory to have received specific training to this respect.</p> <p>Novalis has an environmental chemical management policy and systems for controlling pesticide use.</p> <p>It also has a system implemented with the following elements in order to minimize potential impacts in the work:</p> <ul style="list-style-type: none"> ✓ Handbook and code of good environmental practices with recommended behaviors for own workers and workers from subcontractors, which is known by all employees of the company and its subcontractors. ✓ Code of Conduct that governs the basic criteria to guide the mode of action of any worker. ✓ Novalis, when buying wood chips from other suppliers, and therefore work on the forests are not under their responsibility, includes in any agreements with its suppliers the right to access all information relevant to the matter. <p>In this agricultural areas, they are been collected woody byproducts coming from management of fruit trees plantations that otherwise would be burned.</p> <p>Based on the above, the relative risk is classified like "low risk" under this indicator.</p> |
| Means of VERIFICATION | <ul style="list-style-type: none"> • Existing legal framework. Laws, regulations and public control organizations • Manual of best practices in Sustainable Forest Management • Contracts with suppliers • Information received from suppliers on environmental assessment work • Assessment of potential impacts at the level of work. • Evaluation of measures taken to minimize impacts • Monitoring results • Field visits to forest works in progress |
| Evidence REVIEWED | <p>Ministry of Health, Consumption and Social Welfare:</p> <ul style="list-style-type: none"> • Chemicals legislation: https://www.mscbs.gob.es/ciudadanos/saludAmbLaboral/prodQuimicos/legislacion.htm • Royal Decree 830/2010 of 25 June, the legislation regulating the training set for biocide treatments: https://www.boe.es/boe/dias/2010/07/14/pdfs/BOE-A-2010-11157.pdf <p>Ministry of the Presidency, Royal Decree 1311/2012, of 14 September, establishing the framework for action is set to achieve a sustainable use of plant protection products: https://www.boe.es/boe/dias/2012/09/15/pdfs/BOE-A-2012-11605.pdf</p> <p>Novalis. Environmental management system and forestry</p> |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |

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| | Indicator |
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| 2.2.9 | The Biomass Producer has implemented appropriate control systems and procedures for verifying that methods of waste disposal minimise negative impacts on forest ecosystems (CPET S5d). |
| Finding | <p>In this respect it should be noted that there is a clear legal framework and effective and competent authorities exercising their control tasks in Spain. Spanish legislation and monitoring procedures carried out by the Autonomous Communities are consistent. The Autonomous Communities have their own staff to perform control. In addition it exists within the Civil Guard Corp, the SEPRONA (Nature Protection Service) that performs environmental police. There are no published reports of significant environmental damage from waste generation activities related to silvicultural works.</p> <p>On the other hand, Novalis has an environmental policy to reduce to the maximum the production of waste and if they occur, reuse and recycle most of it. The waste management system of Novalis is determined in the Manual of Good Practices in Sustainable Forest Management where it is indicated that, regarding with hazardous waste, the mandatory of waterproof the floor where it is stored and to eliminate them through authorized agents.</p> <p>Furthermore, Novalis has implemented a system with the following elements in order to minimize potential impacts in the work:</p> <ul style="list-style-type: none"> ✓ Handbook and code of good environmental practices with recommended behaviors for own workers and workers from subcontractors, which is known by all employees of the company and its subcontractors. ✓ Code of Conduct that governs the basic criteria to guide the mode of action of any worker. ✓ Novalis, when buying wood chips from other suppliers, and therefore work on the forests are not under their responsibility, includes in any agreements with its suppliers the right to access all information relevant to the matter. <p>Based on the above, the relative risk is classified like "low risk" under this indicator.</p> |
| Means of VERIFICATION | <ul style="list-style-type: none"> • Existing legal framework. Laws, regulations and public control organizations • Manual of best practices in Sustainable Forest Management • Contracts with suppliers • Information received from suppliers on environmental assessment work • Assessment of potential impacts at the level of work. • Evaluation of measures taken to minimize impacts • Monitoring results • Field visits to forest work in progress. • Certificate of visit to recognize the lands |
| Evidence REVIEWED | <p>Miteco, prevention and waste management, policy and planning: https://www.miteco.gob.es/es/calidad-y-evaluacion-ambiental/temas/prevencion-y-gestion-residuos/normativa-y-planificacion/ Law 22/2011 of waste and contaminated soil: https://www.boe.es/buscar/pdf/2011/BOE-A-2011-13046-consolidado.pdf Novalis. Environmental management system and forestry</p> |

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


| | Indicator |
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| 2.3.1 | Analysis shows that feedstock harvesting does not exceed the long-term production capacity of the forest, avoids significant negative impacts on forest productivity and ensures long-term economic viability. Harvest levels are justified by inventory and growth data. |
| Finding | <p>Forestry statistics available (IFN3) show a significant increase in timber stocks in Spain inventory, as a result of both, the continued increase in forest area in recent decades as the growth of forests.</p> <p>Also, according to the reports prepared by the Forestry Service of the Ministry, the annual growth of wood of the Spanish forests (45 million m3) is of the order of three times the amount actually being cut (15 million m3 per year). This balance, with extraction rate of 35% of growth, is maintained with the current data. However, the figures vary widely between regions, ranging between 10% and 88%. In any case, cuttings are always below the growth rates.</p> <p>Data of cuttings in 2016 by AUTONOMOUS COMMUNITIES and the total of Spain are:</p>  <p>Harvesting figures are always well justified. In eucalyptus tree plantations the whole mass is harvested at the end of the cycle (age of cutting), whereas in the pine forests intermediate works are performed by thinnings, although in all cases cutting levels are conservative as shown in the statistics and reports.</p> <p>In 2012 data extraction rates by AUTONOMOUS COMMUNITIES are:</p> |

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

| Comunidad Autónoma | Tasa de extracción (%) | Crecimiento (m³ x 1000) | Extracción (m³ x 1000) | Consumo de madera (m³ x 1000) | Tasa de Cobertura (%) | Sup. Arbolada (x 1000 ha) | Intensidad de cortas (m³/ha arbolada) |
|----------------------|------------------------|-------------------------|------------------------|-------------------------------|-----------------------|---------------------------|---------------------------------------|
| Andalucía | 12 | 3.075 | 368 | 5.542 | 6,6 | 2.666 | 0,14 |
| Aragón | 6 | 2.760 | 171 | 893 | 19,1 | 1.578 | 0,11 |
| Asturias | 29 | 2.810 | 820 | 720 | 113,8 | 451 | 1,82 |
| Baleares | 5 | 222 | 10 | 728 | 1,4 | 186 | 0,05 |
| Canarias | 4 | 383 | 15 | 1.412 | 1,1 | 134 | 0,11 |
| Cantabria | 42 | 1.215 | 505 | 392 | 128,8 | 214 | 2,36 |
| Castilla La Mancha | 7 | 3.374 | 227 | 1.375 | 16,5 | 2.740 | 0,08 |
| Castilla y León | 20 | 7.204 | 1.470 | 1.707 | 86,1 | 2.982 | 0,49 |
| Cataluña | 15 | 3.964 | 615 | 4.957 | 12,4 | 1.626 | 0,38 |
| Comunidad Valenciana | 5 | 756 | 40 | 3.394 | 1,2 | 754 | 0,05 |
| Extremadura | 51 | 1.223 | 631 | 735 | 85,8 | 1.921 | 0,33 |
| Galicia | 58 | 13.057 | 7.619 | 1.862 | 409,2 | 1.405 | 5,42 |
| La Rioja | 6 | 728 | 42 | 215 | 19,5 | 170 | 0,24 |
| Madrid | 7 | 394 | 27 | 4.281 | 0,6 | 270 | 0,10 |
| Murcia | 1 | 237 | 2 | 982 | 0,2 | 316 | 0,01 |
| Navarra | 21 | 1.488 | 315 | 418 | 75,3 | 463 | 0,68 |
| País Vasco | 27 | 3.831 | 1.021 | 1.453 | 69,6 | 398 | 2,56 |
| Total España | 30 | 46.722 | 13.898 | 31.066 | 44,7 | 18.264 | 0,76 |

Fuente: MAGRAMA (2012)

In the agricultural areas, they are been collected woody byproducts coming from management of fruit trees and olive trees plantations that otherwise would be burned. Taking into account all the above information the risk is classified like "low risk" under this indicator.

Means of VERIFICATION

- Management Plan and growth stocks data
- National or regional inventories, inventory data and growth.
- Data volumes harvested

Evidence REVIEWED

Government of Spain:

- Ministry of Agriculture, Fisheries and Food: <https://www.mapa.gob.es/es/>
- Ecological Transition Ministry: <https://www.miteco.gob.es/es/>
- biodiversity: <https://www.miteco.gob.es/es/biodiversidad/temas/>
- Forestry statistics: <https://www.miteco.gob.es/es/biodiversidad/estadisticas/>
- Statistical yearbooks Forest: https://www.mapa.gob.es/es/desarrollo-rural/estadisticas/forestal_anuarios_todos.aspx
- Forestry Statistics Yearbook 2016: https://www.mapa.gob.es/es/desarrollo-rural/estadisticas/aef2016web_tcm30-506155.pdf
- IFN3: <https://www.miteco.gob.es/es/biodiversidad/servicios/banco-datos-naturaleza/informacion-disponible/ifn3.aspx>
- Aprovechamientos Forestry statistics: https://www.mapa.gob.es/es/desarrollo-rural/estadisticas/forestal_aprovechamientos.aspx

Junta de Andalucía:

- Ministry of Environment and Territory Management: <http://www.juntadeandalucia.es/medioambiente/site/portalweb>
- Forest Service: <https://goo.gl/o7bEfQ>
- Infoca plan. The natural Andalusian Plan.

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| | <p>Murcia region:</p> <ul style="list-style-type: none"> Natural: http://www.murcianatural.carm.es/web/guest Forest area: http://www.murcianatural.carm.es/web/guest/ambito-forestal <p>Valencian Community:</p> <ul style="list-style-type: none"> Natural: https://goo.gl/7umhzn Montes and Forests: http://www.agroambient.gva.es/es/web/medio-natural/montes http://www.agroambient.gva.es/web/medio-natural/el-territorio-forestal-de-la-comunitat-valenciana <p>Castilla la Mancha:</p> <ul style="list-style-type: none"> Directorate General Forestry Policy and Natural Areas, Performances: http://www.castillalamancha.es/gobierno/agrimedambydesrur/estructura/dgapfyen/accionesorganismo Directorate General Forestry Policy and Natural Spaces, Sustainable Forest Management: http://www.castillalamancha.es/gobierno/agrimedambydesrur/estructura/dgapfyen/acciones/gestion-forestal-sostenible Directorate General Forestry Policy and Natural Spaces, electronic headquarters: https://www.jccm.es/gobierno/agricultura/estructura/dgamen Public roads Livestock and Forestry: http://agricultura.jccm.es/imovip/index_imv.php <p>Spanish Forest Science Society:</p> <ul style="list-style-type: none"> Progress Report of forests and forestry (ISFE) in Spain 2013: http://secforestales.org/content/informe-isfe ISFE 2017 progress report: http://secforestales.org/sites/default/files/archivos/7cfe_avance_isfe_final.pdf |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

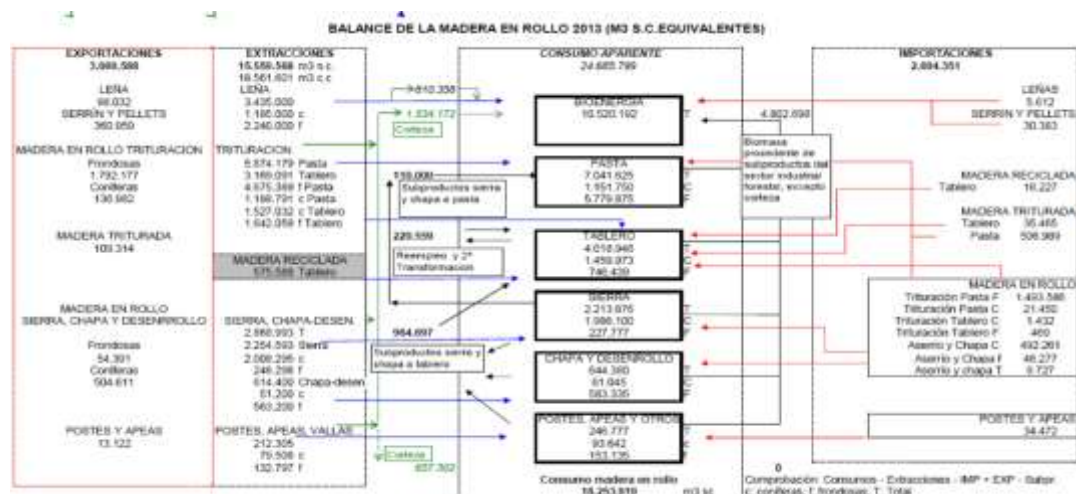
| | Indicator |
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| 2.3.2 | Adequate training is provided for all personnel, including employees and contractors (CPET S6d). |
| Finding | Novalis has implemented a system that covers all aspects to be considered in order to ensure that the law is fulfilled in terms of POH (PREVENTION OF OCCUPATIONAL HAZARDS) and Occupational Health and Safety, including adequate training of workers. Much companies hire external prevention services, who will be in charge of the study of occupational risks of the company, and implementing the necessary measures to minimize and address the adequate training of workers of the company. In the case of |

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| | <p>Novalis, the contracted prevention service is done with Grupo Preving. Through this way is how Novalis is carrying out training plans for all staff.</p> <p>Regarding subcontractors working for Novalis requests them to verify all documents relating to the working conditions of workers, including training through the Training and Certificates Required information regarding POH (PREVENTION OF OCCUPATIONAL HAZARDS) . For suppliers, Novalis includes in any agreements signed the right of access to information.</p> <p>In addition, Novalis has two manuals:</p> <ol style="list-style-type: none"> 1. Guide sheets for forestry works Rev1 2. Guide sheets for Forest Machinery management Rev 2 <p>These manuals, when developed and implemented in all forestry works, describes how to address the necessary preventive safety measures and actions in case of accident or emergency. Novalis can accredit training their workers at this respect.</p> <p>By contract, subcontractors and suppliers companies must have a Manual of Good Practices in Forest works and also must to accredit its implementation to staff or use the Novalis Manual.</p> <p>The system developed is considered complete and sufficient to ensure proper formation of both the own personnel and the subcontractors.</p> <p>Based on the above, the relative risk is classified under this indicator.</p> |
| Means of VERIFICATION | <ul style="list-style-type: none"> • Existing legal framework. Laws, regulations and agencies. • Training plan, registration of courses and training material • Records of training conducted • Monitoring compliance with labor regulations and social security. • Interviews with workers |
| Evidence REVIEWED | <p>Environmental Novalis system.</p> <p>Law 31/1995 on Occupational Risk Prevention: https://www.boe.es/buscar/pdf/1995/BOE-A-1995-24292-consolidado.pdf</p> <p>Royal Decree 39/1997 amending Council Regulation of Prevention Services: https://www.boe.es/buscar/pdf/1997/BOE-A-1997-1853-consolidado.pdf</p> <p>Migration and Social Ministry of Labor, Safety, Career Guidance: http://www.mitramiss.gob.es/es/Guia/index.htm</p> <p>Spanish legislation Labor and Social Security: https://www.boe.es/legislacion/codigos/codigo.php?id=93&modo=1-a=0&tab=2</p> |
| Risk Rating | <p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p> |
| Comment or Mitigation Measure | |

| | Indicator | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|---|-------------------------------|--|---|-----|-----------------------|-----|----------------------|-----|-------------------------------|--|---|-----|-----------------------|-----|----------------------|-----|-------------------------------|--|---|----|-----------------------|----|----------------------|----|-------------------------------|--|---|-----|-----------------------|-----|----------------------|-----|
| 2.3.3 | Analysis shows that feedstock harvesting and biomass production positively contribute to the local economy, including employment. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Finding | <p>The activity of the Spanish forestry industry has been greatly affected by the economic crisis, especially by the bursting of the housing bubble. The data indicate that the activity of the industry is recovering in recent years, since 2012, although it is still far from the previous values to 2008. Within this recovery, bioenergy plays an important role because it is mobilizing many resources both for domestic consumption and for exports, either in the format of wood chips or wood pellets. Foreign trade of the forestry sector has a positive balance in 2012-2016. Regarding economic and employment impacts on the local economy of the AUTONOMOUS COMMUNITIES forests wood producers are scarce and incomes come mainly from other products and services. According to the X Study of Investment and Employment in the Forestry Sector, 2015 and 2016, conducted by ASEMFO in collaboration with the Government of Spain, the number of forest companies in 2016:</p> <p>Andalusia</p> <table border="1"> <thead> <tr> <th colspan="2">Número de empresas forestales</th> </tr> </thead> <tbody> <tr> <td>Nº. Empresas Forestales (IAE 912) en 2016 (ud):</td> <td>664</td> </tr> <tr> <td>Sociedades 2016 (ud):</td> <td>388</td> </tr> <tr> <td>Autónomos 2016 (ud):</td> <td>276</td> </tr> </tbody> </table> <p>Fuente: Camerdata.</p> <p>Valencian Community</p> <table border="1"> <thead> <tr> <th colspan="2">Número de empresas forestales</th> </tr> </thead> <tbody> <tr> <td>Nº. Empresas Forestales (IAE 912) en 2016 (ud):</td> <td>373</td> </tr> <tr> <td>Sociedades 2016 (ud):</td> <td>114</td> </tr> <tr> <td>Autónomos 2016 (ud):</td> <td>259</td> </tr> </tbody> </table> <p>Fuente: Camerdata.</p> <p>Region of Murcia</p> <table border="1"> <thead> <tr> <th colspan="2">Número de empresas forestales</th> </tr> </thead> <tbody> <tr> <td>Nº. Empresas Forestales (IAE 912) en 2016 (ud):</td> <td>80</td> </tr> <tr> <td>Sociedades 2016 (ud):</td> <td>50</td> </tr> <tr> <td>Autónomos 2016 (ud):</td> <td>30</td> </tr> </tbody> </table> <p>Fuente: Camerdata.</p> <p>Castilla la Mancha</p> <table border="1"> <thead> <tr> <th colspan="2">Número de empresas forestales</th> </tr> </thead> <tbody> <tr> <td>Nº. Empresas Forestales (IAE 912) en 2016 (ud):</td> <td>316</td> </tr> <tr> <td>Sociedades 2016 (ud):</td> <td>177</td> </tr> <tr> <td>Autónomos 2016 (ud):</td> <td>139</td> </tr> </tbody> </table> <p>Fuente: Camerdata.</p> | Número de empresas forestales | | Nº. Empresas Forestales (IAE 912) en 2016 (ud): | 664 | Sociedades 2016 (ud): | 388 | Autónomos 2016 (ud): | 276 | Número de empresas forestales | | Nº. Empresas Forestales (IAE 912) en 2016 (ud): | 373 | Sociedades 2016 (ud): | 114 | Autónomos 2016 (ud): | 259 | Número de empresas forestales | | Nº. Empresas Forestales (IAE 912) en 2016 (ud): | 80 | Sociedades 2016 (ud): | 50 | Autónomos 2016 (ud): | 30 | Número de empresas forestales | | Nº. Empresas Forestales (IAE 912) en 2016 (ud): | 316 | Sociedades 2016 (ud): | 177 | Autónomos 2016 (ud): | 139 |
| Número de empresas forestales | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Nº. Empresas Forestales (IAE 912) en 2016 (ud): | 664 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sociedades 2016 (ud): | 388 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Autónomos 2016 (ud): | 276 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Número de empresas forestales | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Nº. Empresas Forestales (IAE 912) en 2016 (ud): | 373 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sociedades 2016 (ud): | 114 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Autónomos 2016 (ud): | 259 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Número de empresas forestales | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Nº. Empresas Forestales (IAE 912) en 2016 (ud): | 80 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sociedades 2016 (ud): | 50 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Autónomos 2016 (ud): | 30 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Número de empresas forestales | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Nº. Empresas Forestales (IAE 912) en 2016 (ud): | 316 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sociedades 2016 (ud): | 177 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Autónomos 2016 (ud): | 139 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

These data are generated by the following values of timber cuttings in Spain obtained from the Government of Spain:

| GOBIERNO DE ESPAÑA MINISTERIO DE AGRICULTURA, PESCA Y ALIMENTACIÓN | | ANUARIO DE ESTADÍSTICA FORESTAL 2016 | | |
|---|-----------|--------------------------------------|---------------------|----------------------|
| COMUNIDAD AUTÓNOMA | PROVINCIA | Coníferas (m3 c.c.) | Frondosas (m3 c.c.) | TOTAL 2016 (m3 c.c.) |
| Total Andalucía | | 40.077,21 | 4.941,00 | 45.018,21 |
| Total Aragón | | 197.953,01 | 16.731,01 | 214.684,02 |
| Total Asturias | | 254.344,00 | 892.583,00 | 1.146.927,00 |
| Total Baleares | | 6.446,53 | 2.228,29 | 8.674,82 |
| Total C. Valenciana | | 13.366,45 | 6.139,46 | 19.505,91 |
| Total Canarias | | 5.019,00 | 30,00 | 5.049,00 |
| Total Cantabria | | 105.043,53 | 424.489,56 | 529.533,09 |
| Total Castilla y León | | 1.729.878,64 | 608.432,35 | 2.338.310,99 |
| Total Castilla-La Mancha | | 236.319,47 | 32.765,00 | 269.084,47 |
| Total Cataluña | | 671.308,10 | 105.496,00 | 776.804,10 |
| Total Extremadura | | 180.868,80 | 609.892,18 | 790.760,98 |
| Total Galicia | | 3.010.464,00 | 5.634.262,00 | 8.644.726,00 |
| Total La Rioja | | 107.530,00 | 41.051,00 | 148.581,00 |
| Total Madrid | | 11.129,30 | 2.707,00 | 13.836,30 |
| Total Murcia | | | | |
| Total Navarra | | 136.012,00 | 115.675,00 | 251.687,00 |
| Total País Vasco | | 1.428.804,58 | 215.829,58 | 1.644.634,16 |
| Total general | | 8.134.564,62 | 8.713.252,43 | 16.847.817,05 |



The population employed in activities related with forestry represents, in 2016, 5.7% of the total population actively working in the country. This percentage has remained at a fairly constant line since 2008, year in which it is stabilized after a steady decline.

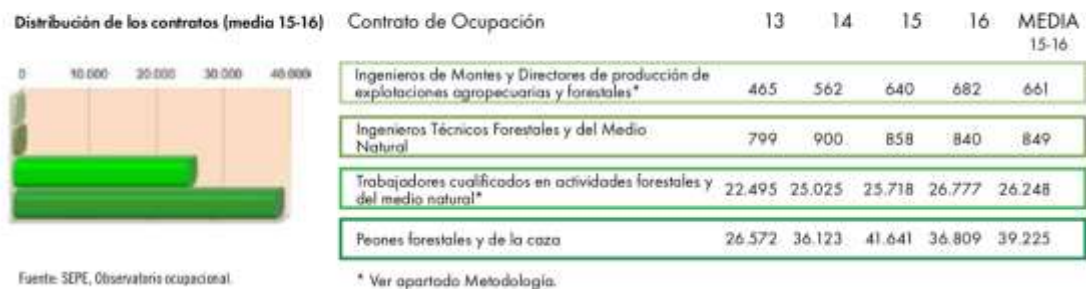
While the most important years of economic crisis, the forestry sector has remained very constant, a relative percentage of active population, demonstrating adaptive capacity to cope with difficult situations, it is expected that in the short-term these percentages may increase relying on green employment generated by sustainable energy uses, as the case of biomass,

greater enhancement of the multifunctionality of the forests, and due to a better perception of citizens about the benefits, both direct and indirect (social, economic and environmental), etc.

According to the X Study of Investment and Employment in the Forestry Sector, 2015 and 2016, by ASEMFO in collaboration with the Government of Spain, data contracts made in the primary forestry sector in 2016

Andalusia

Contratos realizados en el sector forestal primario



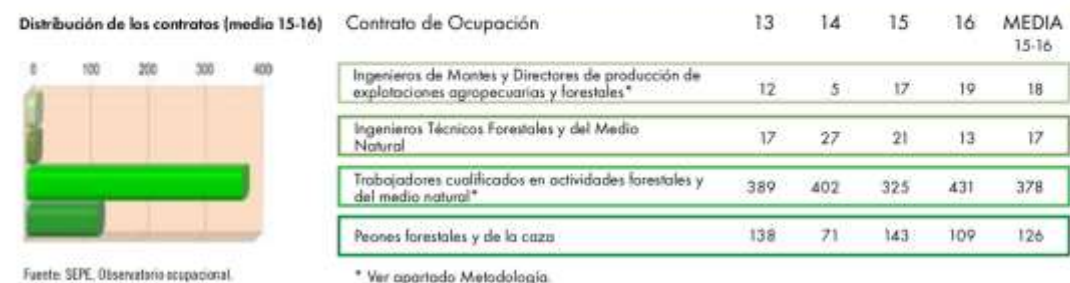
Valencian Community

Contratos realizados en el sector forestal primario



Murcia

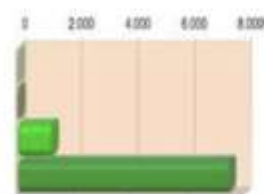
Contratos realizados en el sector forestal primario



Castilla la Mancha

Contratos realizados en el sector forestal primario

Distribución de los contratos (media 15-16)



Fuente: SEPE, Observatorio ocupacional.

| Contrato de Ocupación | 13 | 14 | 15 | 16 | MEDIA 15-16 |
|--|-------|-------|-------|-------|-------------|
| Ingenieros de Montes y Directores de producción de explotaciones agropecuarias y forestales* | 17 | 32 | 23 | 37 | 30 |
| Ingenieros Técnicos Forestales y del Medio Natural | 65 | 70 | 48 | 44 | 46 |
| Trabajadores cualificados en actividades forestales y del medio natural* | 1.889 | 796 | 1.157 | 1.285 | 1.221 |
| Peones forestales y de la caza | 1.928 | 5.177 | 7.872 | 7.120 | 7.496 |

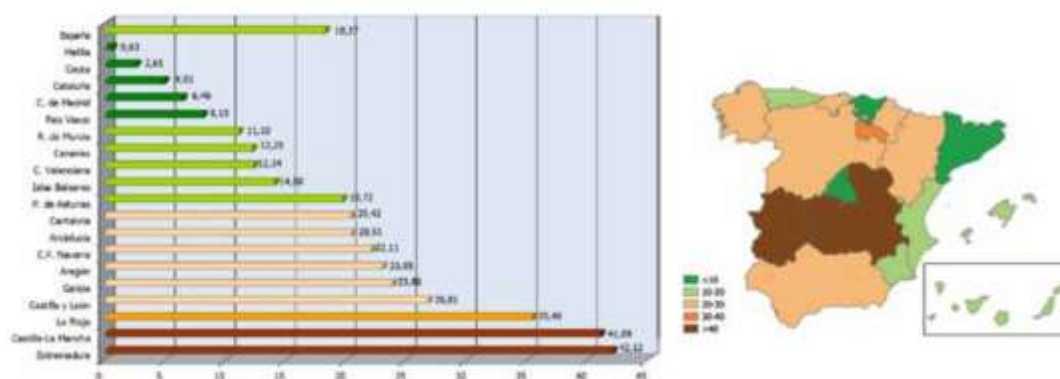
* Ver apartado Metodología.

Another important aspect of forest economy, with data also studying ASEMFO, is the level of investment by public authorities, which is an important source of mobilization of financial resources and job creation.

| Año | 2007 | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 | 2014 | 2015 | 2016 |
|---|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|
| Inversión Total (miles de €) | 52.278.745 | 56.162.224 | 56.580.573 | 56.581.772 | 41.216.232 | 31.999.386 | 28.859.818 | 29.726.256 | 29.789.115 | 27.994.316 |
| Inversión Total actualizada a Enero 2016 (miles de €) | 59.179.540 | 60.992.176 | 60.937.278 | 60.316.169 | 42.576.367 | 32.383.378 | 28.461.359 | 29.258.126 | 29.708.015 | 27.944.316 |
| Inversión en el Sector Forestal (miles de €) | 1.413.787 | 1.556.929 | 1.741.980 | 1.552.076 | 1.088.776 | 1.011.645 | 992.658 | 873.348 | 972.087 | 850.793 |
| Inversión en el Sector Forestal actualizada a Enero 2016 (miles de €) | 1.600.407 | 1.690.825 | 1.876.113 | 1.654.513 | 1.124.706 | 1.023.784 | 978.952 | 859.595 | 969.180 | 850.793 |

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

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



The impact of the work done by Novalis covers both, forest works in private forests and forest works done by the government.

Novalis also subcontracts the execution of some works and also Novalis purchases the material already transformed by local companies, generating an economic chain.

And although Novalis has their own teams, who are already specialized in the work they do, it is always necessary to complete teams with local staff or workers where jobs are performed. In addition, the movement of equipment produces positive impacts on local economies as they are installed in these zones.

Regarding agricultural waste materials, Novalis puts value to byproducts that would otherwise be burned. In this way, the economic impact compared to the whole value of agricultural

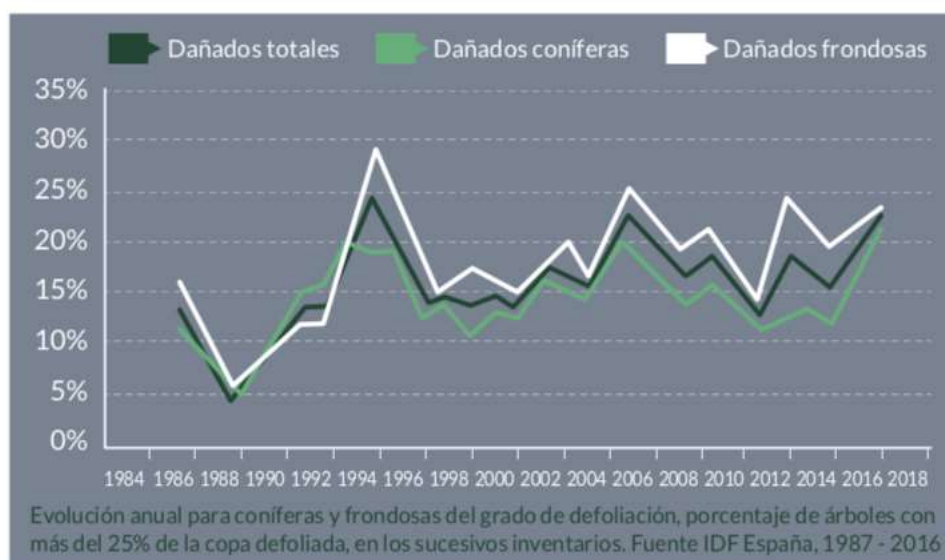
| | |
|-------------------------------|--|
| | production is low, however, byproducts are made into value that otherwise would be burned in operations. Taking into account all the above information relative risk is classified like “low risk” under this indicator. |
| Means of VERIFICATION | <ul style="list-style-type: none"> • Analysis of the contribution to the local economy. • Description of the direct economic value created • Personnel records and jobs created |
| Evidence REVIEWED | <p>ASEMFO, research investment and employment in the forestry sector: http://www.asemfo.org (http://www.asemfo.org/empresas/asemfo/X_estudio_DEF_web.pdf) Government of Spain:</p> <ul style="list-style-type: none"> • Ministry of Agriculture, Fisheries and Food: https://www.mapa.gob.es/es/ • Ecological Transition Ministry: https://www.miteco.gob.es/es/ • biodiversity: https://www.miteco.gob.es/es/biodiversidad/temas/ • Forestry statistics: https://www.miteco.gob.es/es/biodiversidad/estadisticas/ • Statistical yearbooks Forest: https://www.mapa.gob.es/es/desarrollo-rural/estadisticas/forestal_anuarios_todos.aspx • Forest Statistics Yearbook 2016: https://www.mapa.gob.es/es/desarrollo-rural/estadisticas/forestal_anuario_2016.aspx • forestry and foreign trade: https://www.mapa.gob.es/es/desarrollo-rural/estadisticas/forestal_econ_comercio_exterior.aspx <p>Spanish Forest Science Society (http://secforestales.org/content/informe-isfe):</p> <ul style="list-style-type: none"> • Progress Report of forests and forestry in Spain 2013 (ISFE) • ISFE 2017 progress report <p>Global news industry data timber: https://www.asturias.es/RecursosWeb/trabajastur/Estudios%20Sectoriales/Documents/Actualizacion_Forestal_madera_2015.pdf</p> |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

| | Indicator |
|---------|---|
| 2.4.1 | The Biomass Producer has implemented appropriate control systems and procedures for verifying that the health, vitality and other services provided by forest ecosystems are maintained or improved (CPET S7a). |
| Finding | <p>According to current reports, the phytosanitary situation of Spanish forests has worsened recently due to drought based on a non worrying situation at the level of tree mortality. The introduction of pests and foreign pathogens and climate change are currently the main threats to the health of our forests with forest fires.</p> <p>Changes in climate are changing the dynamics of disturbances generated by native forest insects and pathogens, as well as facilitating the establishment and spread of introduced pests. Such changes in the dynamics of changes, added to the direct impact of climate</p> |

change on trees and forest ecosystems, can have negative effects and increase the vulnerability of forests to other alterations.

It continues the introduction of dangerous invasive alien species in our forests. New organisms, such as bacteria *Xylella fastidiosa*, the avispa of chestnut (*Dryocosmus kuriphilus*) or bug pineapples (*Leptoglossus occidentalis*), recently added to other quarantine organisms previously identified as nematode pine (*Bursaphelenchus xylophilus*) or pitch canker of pine (*Fusarium circinatum*) or brown bands (*Mycosphaerella dearnessii*) and red (*Mycosphaerella pini*) that are seriously affecting plantations of radiata pine in the Basque Country and Navarra, or weevil eucalyptus (*Gonipterus platensis* Marelli).

It can be seen in the figure below, taken from the report on the state of forests in Spain of the Spanish Society of Sciences Forest, how increased has significantly from 2015 to 2017 the percentage of trees with more than 25% of treetops defoliated, which it has increased from 15% to values close to 25%, with particularly strong increases in conifers.



The level of control by the forestry authority is medium / high throughout the country. Therefore, the Spanish legislation and monitoring procedures carried out by the Autonomous Communities are consistent. There is a systematic legal framework with action plans implemented at government level to manage the main problems and (European Network Monitoring Damage to Forests) monitoring network data.

The Ministry of Agriculture has a specific section on Plant Health, which develops regulations, guidelines, protocols and follow-up studies of different pests / diseases detected; and In addition in each of the regions there are specific departments that monitor and study these aspects.

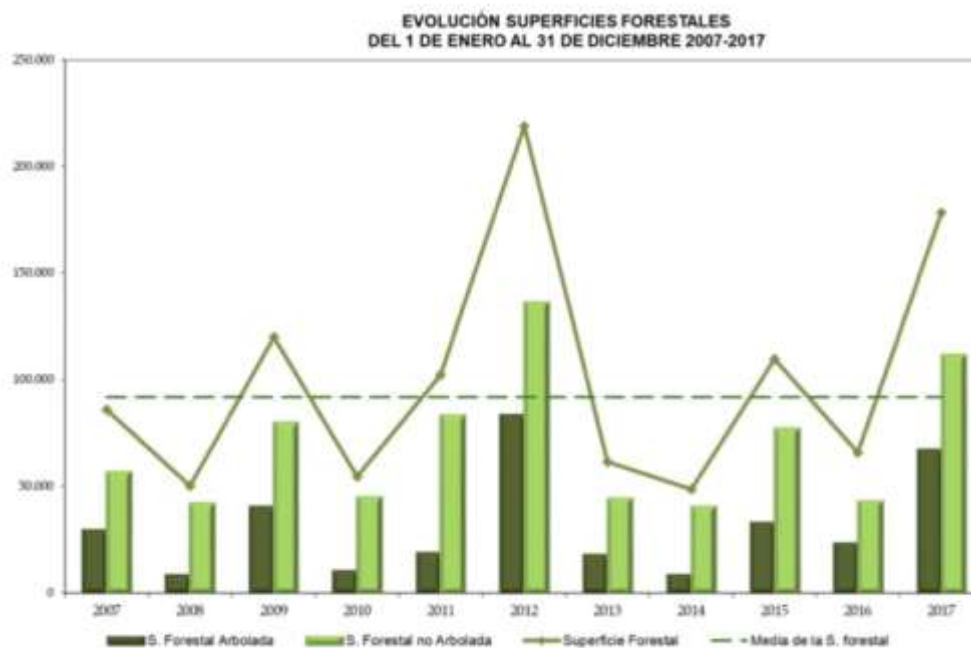
Examples of these tasks of government are:

- Guides Integrated Pest Management, FPG, of the MAP: <https://www.mapa.gob.es/eu/agricultura/temas/sanidad-vegetal/productos-fitosanitarios/guias-gestion-plagas/forestales/>
- Plant Health, wood nematode El Pino, MAPA, which includes information about the demarcated areas in Spain: <https://www.mapa.gob.es/es/agricultura/temas/sanidad-vegetal/nematodo-de-la-madera-del-pino/>
- Contingency Plan nematode Pine Timber of map: https://www.mapa.gob.es/es/agricultura/temas/sanidad-vegetal/pnc_nmp_aprobadoindic_2018_tcm30-510805.pdf

| | |
|-----------------------|--|
| | <ul style="list-style-type: none"> • Project Interreg Sudoe Plurifor, which are represented government (Xunta Galicia, Basque Government, Government Asturias, ...), associations and private entities with the aim of contributing to the development of regional and transnational plans risk management for forest areas susceptible to biotic and abiotic risks: https://plurifor.efi.int/es/sobre-nosotros/ • Plurifor development on Eucalyptus weevil: https://plurifor.efi.int/es/gorgojo-del-eucalipto/ <p>The scope of this assessment is the impact / effect of forestry operations in the indicators evaluated. Forestry operations normally have a positive impact on forest disease control. Moreover, as already discussed, there are manual of good practices implemented in GFS, tracking results, examples of enforcement, reports and action plans related to major diseases and pests.</p> <p>In the agricultural areas, they are been collected woody byproducts coming from management of fruit trees plantations that otherwise would be burned.</p> <p>Therefore, it is concluded that even under the complex situation existing, the relative risk under this indicator is considered like "low risk".</p> |
| Means of VERIFICATION | <ul style="list-style-type: none"> • Existing legal framework. Laws, regulations and public control organizations • Assessment of potential impacts of forest operations in the health and vitality of forests. • Assessment of potential impacts at the level of work and measures taken to minimize them • Good environmental practices in Sustainable Forest Management • Contracts with suppliers • Information received from suppliers • Monitoring results • Expert consultation |
| Evidence REVIEWED | <p>Spanish Forest Science Society:</p> <ul style="list-style-type: none"> • http://secforestales.org/content/informe-isfe • Progress Report of forests and forestry in Spain 2013 (ISFE) • ISFE 2013 executive report • ISFE 2017 progress report <p>European network of forest damage, Level I: https://www.mapa.gob.es/es/desarrollo-rural/temas/politica-forestal/inventario-cartografia/redes-europeas-seguimiento-bosques/red_nivel_I_danos.aspx</p> <p>European network for forest damage, Red Level II results: https://www.mapa.gob.es/es/desarrollo-rural/temas/politica-forestal/inventario-cartografia/redes-europeas-seguimiento-bosques/red_nivel_II_resultados.aspx</p> <p>MAP:</p> <ul style="list-style-type: none"> • Plant Health: https://www.mapa.gob.es/es/agricultura/temas/sanidad-vegetal/default.aspx • Nematode Pine Timber: https://www.mapa.gob.es/es/agricultura/temas/sanidad-vegetal/nematodo-de-la-madera-del-pino/ <p>Plant Health Law 43/2002: http://www.boe.es/buscar/act.php?id=BOE-A-2002-22649</p> <p>Andalusian, Plant Health: http://www.juntadeandalucia.es/organismos/agriculturapescaydesarrollorural/areas/agricultura/sanidad-vegetal.html</p> <p>Valencia, Plant Health: http://www.agroambient.gva.es/es/sanidad-vegetal</p> <p>Region of Murcia, Plant Health: https://www.carm.es/web/pagina?IDCONTENIDO=222&IDTIPO=140&RASTRO=c32\$m</p> <p>Castilla La Mancha, Plant Health: http://www.castillalamancha.es/gobierno/agrimedambydesrur/actuaciones/sanidad-vegetal</p> <p>Guides Integrated Pest Management, FPG, of the MAP: https://www.mapa.gob.es/eu/agricultura/temas/sanidad-vegetal/productos-fitosanitarios/guias-gestion-plagas/forestales/</p> |

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

| | Indicator | | | | | | | | | | | | | | | | | | | | | |
|------------------|---|--|--|------------------------------|--------------------|-------|-------|----------------------|-------|-------|-------------------------|---------------|---------------|--|--|------------------------------|------------------|-----------|-----------|------------------|-----------|------------|
| 2.4.2 | The Biomass Producer has implemented appropriate control systems and procedures for verifying that natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b). | | | | | | | | | | | | | | | | | | | | | |
| Finding | <p>In respect of pests and diseases see indicator 2.4.1 in which it is justified that there is a clear regulatory framework, action plans and data monitoring networks and administrations in the management and control of these. Therefore, it is considered, in general, that there is a proper management of pests and diseases, also taking into account that much of the responsibility to respect fall on the government.</p> <p>Regarding forest fires,it can not be denied that currently they represent one of the greatest threats of forests in Spain. It is expected, and for sure it is already happening, that climate change affects the susceptibility of forests to disturbances, as well as the frequency, intensity, the duration and times of these alterations. For example, it may occur an increase in the accumulation of fuel in the forests,also that fire risk seasons are longer, and an increase in occurrence of extreme weather conditions. It is also expected to increase the frequency and intensity of forest fires.</p> <p>The current trend is that the forest provide a structure of vegetation increasingly dangerous in this regard, as they accumulate the fine biomass that in the past were used to feek animals and to be used as firewood for heating, but nowadays produces spatial continuity of fuel into the forest.</p> <p>Data from 2017 indicate that the total number of forest fires has increased 11.57% over the average of the past decade, an increase of 5.80% in the number of attempts (surface ≤1 ha) and 23, 05% in fire (surface> 1ha) respectively. It was (2017) the third year with the highest number of forest fires accidents in the past decade.</p> <table><thead><tr><th></th><th>MEDIA DEL DECENIO 2007-2017 (01/01/-31/12)</th><th>AÑO 2017 (01/01-31/12)</th></tr></thead><tbody><tr><td>Nº CONATOS (<1 ha)</td><td>8.228</td><td>8.705</td></tr><tr><td>Nº INCENDIOS (≥1 ha)</td><td>4.135</td><td>5.088</td></tr><tr><td>TOTAL SINIESTROS</td><td>12.363</td><td>13.793</td></tr></tbody></table> <p>Regarding to the affected areas, a clear raised up from the average is produced, being 145% in the tree covered areas and 94% in general forests areas. Year 2017 ranks second decade of the affected area.</p> <table><thead><tr><th></th><th>MEDIA DEL DECENIO 2007-2017 (01/01/-31/12)</th><th>AÑO 2017 (01/01-31/12)</th></tr></thead><tbody><tr><td>S. ARBOLADA (ha)</td><td>27.226,41</td><td>66.839,02</td></tr><tr><td>S. FORESTAL (ha)</td><td>91.846,74</td><td>178.233,93</td></tr></tbody></table> | | MEDIA DEL DECENIO 2007-2017 (01/01/-31/12) | AÑO 2017 (01/01-31/12) | Nº CONATOS (<1 ha) | 8.228 | 8.705 | Nº INCENDIOS (≥1 ha) | 4.135 | 5.088 | TOTAL SINIESTROS | 12.363 | 13.793 | | MEDIA DEL DECENIO 2007-2017 (01/01/-31/12) | AÑO 2017 (01/01-31/12) | S. ARBOLADA (ha) | 27.226,41 | 66.839,02 | S. FORESTAL (ha) | 91.846,74 | 178.233,93 |
| | | MEDIA DEL DECENIO 2007-2017 (01/01/-31/12) | AÑO 2017 (01/01-31/12) | | | | | | | | | | | | | | | | | | | |
| | Nº CONATOS (<1 ha) | 8.228 | 8.705 | | | | | | | | | | | | | | | | | | | |
| | Nº INCENDIOS (≥1 ha) | 4.135 | 5.088 | | | | | | | | | | | | | | | | | | | |
| | TOTAL SINIESTROS | 12.363 | 13.793 | | | | | | | | | | | | | | | | | | | |
| | MEDIA DEL DECENIO 2007-2017 (01/01/-31/12) | AÑO 2017 (01/01-31/12) | | | | | | | | | | | | | | | | | | | | |
| S. ARBOLADA (ha) | 27.226,41 | 66.839,02 | | | | | | | | | | | | | | | | | | | | |
| S. FORESTAL (ha) | 91.846,74 | 178.233,93 | | | | | | | | | | | | | | | | | | | | |



According to the provisional statistics provided by the relevant departments of regional administrations, during 2017 they took place 56 Big Forest Fires (BFF), a category that includes those fires exceeding 500 hectares of forest affected. Total BFF registered accounted for 54.96% of the total area affected and 0.41% of total forest fires incurred. Northwest Spain was the area hardest hit by BFF, to be the scene of the 73.21% of them and the 74.54% of areas burned by them. Only in October were 31 BFF (55% of the annual total), all in the Northwest region.

According to the data it seems that the recurrence of catastrophic years in connection with forest fires in Spain is into the range of every 5 years, being the last two 2012 (which affected especially Castilla y León and Valencia) and 2017 (which particularly affected the Northwest Peninsular: Galicia, Asturias, León).

From the management point of view, many of the responsibilities for forest fires lie on government. However, owners of forests have some responsibilities on giving an appropriate management of the forests and promoting some prevention facilities for fire protection. It will be on these issues, related to forestry operations, which it is focused the analysis of the indicator.

Regarding management of the forests we can make the following differences:

1. public forests Novalis is working in. The administration, by itself is in charge of any management of these forests, so they are responsible for maintaining adequate defense infrastructures and prevention. In this respect it may be considered that the level of implementation of this infrastructure is suitable.
2. Private forests. All existing legislation establishes limitations on forestry works (especially in the Mediterranean) in times of high fire risk and, in addition, obligations or responsibilities of managers / owners of the forests regarding prevention / fight against forest fires. Some examples are:

- In Andalusia there are responsibilities in respect of fire prevention by land owners through Management Plans or Plans for Forest Fire Prevention and implementing prevention measures / defense established either in this document or in the plans drawn up by the administration. Failure to do so means that, in case of fire, the Andalusian Administration will charge to the owner the cost of extinguishing the forest fire generated within their lands. In addition, there is a resolution of the General Directorate of the Natural Environment and Protected Areas June 21, 2018 by preventive measures for works into the forests into the periods when high risk of fire, that forces the companies working at the forests to take measures there specified.

| | |
|-----------------------|---|
| | <ul style="list-style-type: none"> • In Valencia the planning of actions is performed by the Generalitat Valenciana through the adoption of sectoral plans of forest fires and the possibility that, with subordination to, the municipalities draw up local plans for forest fires. The owners of forest lands and local authorities in areas of high risk of forest fire shall be obliged to take appropriate measures to prevent forest fires and should perform on their own, the work allocated to them in the form, terms and conditions laid down in fire prevention plans. • Murcia forest administration made the declaration of High Risk Zones, as well as the approval of their defense plans. These plans work preventive proves necessary be established, including silvicultural treatments as appropriate, firewalls areas, access roads and water points to be made by the owners of the forests in the area, implementation deadlines, and the implementation modalities of work, depending on the legal status of the lands, through agreements, agreements, temporary transfer of land to the Administration, grants or subsidies or, where applicable, subsidiary execution by the Administration. <p>Therefore, in the private forest owners forests have responsibilities to plan and maintain infrastructures for forest fire prevention and protection. In addition, companies working at the forests must fulfill certain requirements when working in the forests in summer time. It is on these issues, where deficiencies are found both, in planning and in management.</p> <p>Therefore, the next level of risk is defined as:</p> <ol style="list-style-type: none"> 1. "Low risk" for management of pests and diseases 2. "Low risk" for management of forest fires in public forests 3. specified for managing forest fires in private forests. |
| Means of VERIFICATION | <ul style="list-style-type: none"> • Existing legal framework. Laws, regulations and public control organizations • Assessment of potential impacts of forest operations in the health and vitality of forests. • Assessment of potential impacts at the level of work and measures taken to minimize them • Good environmental practices in Sustainable Forest Management • Contracts with suppliers • Information received from suppliers • Results of monitoring and statistical data available • Expert consultation |
| Evidence REVIEWED | <p>MAP:</p> <ul style="list-style-type: none"> • Forest fires: https://www.mapa.gob.es/es/desarrollo-rural/temas/politica-forestal/incendios-forestales/ • Forest fires regulations: https://www.mapa.gob.es/es/desarrollo-rural/legislacion/leg-espanola-forestal-incendios.aspx • Forest Fire Statistics: https://www.mapa.gob.es/es/desarrollo-rural/estadisticas/Incendios_default.aspx • Bushfire 2017. Data News flash: https://www.mapa.gob.es/es/desarrollo-rural/estadisticas/iiff_2017_def_tcm30-446071.pdf <p>Montes consolidated text Act (Law 43/2003 on Forestry modified by Law 10/2006 of April 28 and 21/2015, of 20 July): https://www.boe.es/buscar/act.php?id=BOE-A-2003-21339</p> <p>Law 2/1992 of 15 June, Forest of Andalusia: https://www.boe.es/buscar/act.php?id=BOE-A-1992-15996</p> <p>Law 5/1999 Prevention and Fight against forest fires in Andalusia: https://www.boe.es/buscar/pdf/1992/BOE-A-1992-15996-consolidado.pdf</p> <p>Law 3/1993, of 9 December, of the Generalitat Valenciana, Forest of Valencia, consolidated text: http://www.dogv.gva.es/auto/dogv/docvpub/rlgv/1993/L_1993_03_ca_L_2017_21.pdf</p> <p>Fire Prevention Legislation Valencia: http://www.agroambient.gva.es/es/legislacion-prevencion-de-incendios-forestales</p> <p>Natural Murcia, Wildfires: http://www.murcianatural.carm.es/web/guest/incendios/-/asset_publisher/3gYZ/content/177551;jsessionid=99077A1418A1146D4B25ADA9318B2EF8?_101_INSTANCE_3gYZ_redirect=%2Fweb%2Fquest%2Fincendios&assetId=177551#.XNIKWS8rw_U</p> |

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| | <p>Law 3/2008 of 12 June, Forestry and Sustainable Forest Management of Castilla-La Mancha: https://www.boe.es/buscar/act.php?id=BOE-A-2008-13685&p=20091223&tn=2</p> <p>Castilla la Mancha: http://www.castillalamancha.es/gobierno/agrimedambydesrur/estructura/dgapfyen/actuaciones/documentos-y-normativa-en-materia-de-incendios-forestales</p> <p>Spanish Forest Science Society:</p> <ul style="list-style-type: none"> • http://secforestales.org/content/informe-isfe • Progress Report of forests and forestry in Spain 2013 (ISFE) • ISFE 2017 progress report |
| Risk Rating | <p><input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p> |
| Comment or Mitigation Measure | <p>It should be taken into account that forest works done by Novalis: silvicultural treatments, thinnings, have a positive impact regarding forest fire prevention usually because they reduce density and biomass in forests.</p> <p>In addition, Novalis has implemented a manual of good practices, known by all employees, in which measurements are to be taken to prevent forest fires arising from their work.</p> <p>Looking ahead to mitigate the risk defined, it is necessary to establish, for works on private forests that Novalis:</p> <ol style="list-style-type: none"> 1. Verify that the property meets its obligations as regards prevention and fire prevention: Prevention Plans ... 2. If so is done, it is possible to go ahead with the works, making sure that the company doing the jobs meets its obligations, such as the provisions of resolution of the General Directorate of the Natural Environment and Protected Areas June 21, 2018 of Junta de Andalucía. 3. If not: <ul style="list-style-type: none"> ✓ the material is rejected in SBP risk analysis or it complies with the law (Prevention Plan) before running the job. In this case, it is mandatory to make sure that the company running the works meets with its obligations, such as the provisions of the resolution of the General Directorate of the Natural Environment and Protected Areas June 21, 2018 of the Government of Andalusia. |

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| 2.4.3 | The Biomass Producer has implemented appropriate control systems and procedures for verifying that there is adequate protection of the forest from unauthorised activities, such as illegal logging, mining and encroachment (CPETS7c). |
| Finding | <p>It doesn't exist in Spain a relevant importance to the respect of unauthorized or illegal activities in the forests such as cuttings, mining or illegal occupations. If problems are identified on a small scale, such as sports unauthorized theft of firewood, timber and fruits, poaching, illegal dumps, wild dogs ...</p> <p>Illegal activities have a little impact on the Spanish forests and there are not reports that recount situations of substantial magnitude respect.</p> <p>Therefore, the relative risk is set like "low risk" under this indicator.</p> |
| Means of VERIFICATION | <ul style="list-style-type: none"> • Records of inspections and monitoring field • Interviews with workers • Interviews with stakeholders • Public information available (media) |

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| Evidence REVIEWED | Illegal Logging Portal, Spain: https://www.illegal-logging.info/regions/spain Transparency International. IPC Spain: https://www.transparency.org/country/ESP |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

| | Indicator |
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| 2.5.1 | The Biomass Producer has implemented appropriate control systems and procedures for verifying that legal, customary and traditional tenure and use rights of indigenous people and local communities related to the forest are identified, documented and respected (CPET S9). |
| Finding | <p>In Spain there are many customary rights linked to the forests of the Iberian Peninsula that come from antiquity. No relevant conflicts exists related to these rights and there are established procedures for their management and resolution. Many of these uses have been extinguished by disuse or simply exist but are not used, and others have been integrated into the management of forests (public roads, firewood, community management ...).</p> <p>An example of these uses are community forests, both Roman and Germanic, which have been recovering since the establishment of democracy in 1977. Where communities have demonstrated a use for the common neighbors have declared "Montes Vecinales". There exist Neighborhood Forest Boards and legislation governing their activity. There are many forest or other associations, local or regional level, which perform an important job in recovery or maintenance of customary uses of the forests.</p> <p>They do not exist in Spain indigenous peoples or minorities requiring special protection regarding their rights on the use of the forests, nor local communities that depend for their livelihood on the services of the forests.</p> <p>In, private agricultural lands there are no customary rights beyond public roads.</p> <p>Therefore, the relative risk under this indicator is se like "low risk".</p> |
| Means of VERIFICATION | <ul style="list-style-type: none"> • Customary uses, when present, are identified and documented • Interviews with local communities and other stakeholders • There are appropriate mechanisms for conflict resolution |
| Evidence REVIEWED | <p>Montes consolidated text Act (Law 43/2003 on Forestry modified by Law 10/2006 of April 28 and 21/2015, of 20 July): https://www.boe.es/buscar/act.php?id=BOE-A-2003-21339</p> <p>Civil Code: https://www.boe.es/buscar/pdf/1889/BOE-A-1889-4763-consolidado.pdf</p> <p>Law 2/1992 of 15 June, Forest of Andalusia: https://www.boe.es/buscar/act.php?id=BOE-A-1992-15996</p> <p>Law 3/1993, of 9 December, of the Generalitat Valenciana, Forest of Valencia, consolidated text: http://www.dogv.gva.es/auto/dogv/docvpub/rlgv/1993/L_1993_03_ca_L_2017_21.pdf</p> <p>Law 3/2008 of 12 June, Forestry and Sustainable Forest Management of Castilla La Mancha: https://www.boe.es/buscar/pdf/2008/BOE-A-2008-13685-consolidado.pdf</p> |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

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| 2.5.2 | The Biomass Producer has implemented appropriate control systems and procedures for verifying that production of feedstock does not endanger food, water supply or subsistence means of communities, where the use of this specific feedstock or water is essential for the fulfilment of basic needs. |
| Finding | <p>This indicator is considered applicable only to protect the headwaters of watersheds in areas of southern and eastern Spain, which are more arid. In these areas, protective afforestations were made by the state and they are protected by both, state and regional legislation. In addition, these public forests are usually managed by the administration (in fact, this kind of forests are one of those who can be included in the catalog of public utility).</p> <p>In any case, the forest works (logging, thinnings, prunings) require prior authorization by the competent administration and oversight by the agents of authority.</p> <p>The relative risk is classified like "low risk" under this indicator.</p> |
| Means of VERIFICATION | <ul style="list-style-type: none"> Existing legal framework. Laws, regulations and public control organizations Technical Specification of awarding work in Forest Work permits / logging |
| Evidence REVIEWED | <p>Montes consolidated text Act (Law 43/2003 on Forestry modified by Law 10/2006 of April 28 and 21/2015, of 20 July): https://www.boe.es/buscar/act.php?id=BOE-A-2003-21339</p> <p>Miteco, Legal Framework of Water Planning: https://www.miteco.gob.es/es/agua/legislacion/Marco_normativo_planificacion.aspx</p> <p>Law 2/1992 of 15 June, Forest of Andalusia: https://www.boe.es/buscar/act.php?id=BOE-A-1992-15996</p> <p>Law 3/1993, of 9 December, of the Generalitat Valenciana, Forest of Valencia, consolidated text: http://www.dogv.gva.es/auto/dogv/docvpub/rlgv/1993/L_1993_03_ca_L_2017_21.pdf</p> <p>Law 3/2008 of 12 June, Forestry and Sustainable Forest Management of Castilla La Mancha: https://www.boe.es/buscar/pdf/2008/BOE-A-2008-13685-consolidado.pdf</p> |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

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| 2.6.1 | The Biomass Producer has implemented appropriate control systems and procedures for verifying that appropriate mechanisms are in place for resolving grievances and disputes, including those relating to tenure and use rights, to forest management practices and to work conditions. |
| Finding | <p>In Spain there are legal ways, clear and well known, for resolving conflicts whose are also governed by the applicable laws.</p> <p>The legal framework for the respect of rights of use and ownership of land, forest management activities and conditions of workers includes, among others:</p> <ul style="list-style-type: none"> • Civil Code • Spanish constitution • Forestry Act of the State and the AUTONOMOUS COMMUNITIES • Status of workers <p>The existing legal framework and different laws clearly define the responsibilities and duties of the people involved in these issues and provide a clear framework for appeals or complaints in case of disputes over these issues.</p> <p>In addition, Novalis has a complaints handling procedure integrated into their chain of custody certificates FSC / PEFC.</p> <p>Therefore, the relative risk under this indicator is set like “low risk”.</p> |
| Means of VERIFICATION | <ul style="list-style-type: none"> • Existing legal framework • Level governance • Good forestry practices manuals • Existence of contracts |
| Evidence REVIEWED | <p>Civil Code: https://www.boe.es/buscar/pdf/1889/BOE-A-1889-4763-consolidado.pdf</p> <p>Spanish constitution: https://www.boe.es/buscar/pdf/1978/BOE-A-1978-31229-consolidado.pdf</p> <p>Status of workers: https://www.boe.es/buscar/pdf/2015/BOE-A-2015-11430-consolidado.pdf</p> <p>Montes consolidated text Act (Law 43/2003 on Forestry modified by Law 10/2006 of April 28 and 21/2015, of 20 July): https://www.boe.es/buscar/act.php?id=BOE-A-2003-21339</p> <p>Law 2/1992 of 15 June, Forest of Andalusia: https://www.boe.es/buscar/act.php?id=BOE-A-1992-15996</p> <p>Law 3/1993, of 9 December, of the Generalitat Valenciana, Forest of Valencia, consolidated text: http://www.dogv.gva.es/auto/dogv/docvpub/rlgv/1993/L_1993_03_ca_L_2017_21.pdf</p> <p>Law 3/2008 of 12 June, Forestry and Sustainable Forest Management of Castilla La Mancha: https://www.boe.es/buscar/pdf/2008/BOE-A-2008-13685-consolidado.pdf</p> <p>Spanish legislation Labor and Social Security: https://www.boe.es/legislacion/codigos/codigo.php?id=93&modo=1-a=0&tab=2</p> |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

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| 2.7.1 | The Biomass Producer has implemented appropriate control systems and procedures for verifying that Freedom of Association and the effective recognition of the right to collective bargaining are respected. |
| Finding | <p>Labor rights are adequately protected in Spain including those specified in the fundamental ILO principles. Spain has ratified the 8 ILO Fundamental Conventions.</p> <p>On the other hand, there are some concerns about civil rights in Spain reflected in reports by international organizations such as Amnesty International, see the 2017 report on Spain. None of the concerns is directly related to the forestry sector nor pruning works and replacement of fruit trees in crops where agricultural wood chips is produced. In agriculture there is some perception of the existence of abuses or lack of protection of workers, especially immigrants, linked to greenhouse and intensive agricultural production areas (mostly arable area) reflected regularly in the media</p> <p>The International Confederation of Trade Unions (IUTC) published in 2014 a report on working conditions in 139 countries conducting a study under 97 internationally recognized indicators. Spain received a score of 2, in a range of 1 to 5 (where 1 is the best situation). The value 2 involves repeated violations that may affect the improvement of working conditions. ("Have Certain rights come under attack by the Governments Repeated and / or companies and Have Undermined the struggle for better working conditions).</p> <p>One of the fundamental legal principles that that holds the current labour relationships system in Spain is contained in paraf. one, Art. 28 ,Spanish constitution, which recognizes the right to freedom of association as a fundamental right of all to organize freely by themselves. And In addition Article 37 of the Constitution, in conjunction with Articles 35 and 38, includes the constitutional framework of labor relations. Under this provision, the law must guarantee the right of collective labor to negotiate and the binding force of the agreements, also recognize the right of workers and employers to assume collective agreements. The law governing the exercise of this right, subject to such limitations as may establish, include the safeguards necessary to ensure the operation of essential community services.</p> <p>There is In addition a Plan of the Government of Spain to combat illegal employment and Social Security fraud. Labor inspectors are the authority designated by the Government to control labor rights and security. companies inspections are performed respect, and are punishable offenses detected and corrected. No violations found relevant laws or rights of free association and collective bargaining related to the forestry sector.</p> <p>Therefore, the relative risk under this indicator is set like "low risk".</p> |
| Means of VERIFICATION | <ul style="list-style-type: none"> • Existing legal framework and level of governance • Employment contracts • Existence of collective agreement • Company policies • Interviews with officials of Human Resources • Interviews with workers |
| Evidence REVIEWED | <p>ILO Spain: http://www.ilo.org/madrid/oit-en-españa/lang-es/index.htm</p> <p>ILO Conventions: http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang-es/index.htm</p> <p>ITUC Global Rights Index The World's Worst Countries for workers: http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf</p> <p>Spanish constitution: https://www.boe.es/buscar/pdf/1978/BOE-A-1978-31229-consolidado.pdf</p> <p>Status of workers: https://www.boe.es/buscar/pdf/2015/BOE-A-2015-11430-consolidado.pdf</p> <p>Spanish legislation Labor and Social Security: https://www.boe.es/legislacion/codigos/codigo.php?id=93&modo=1-a=0&tab=2</p> <p>http://www.congreso.es/consti/constitucion/indice/sinopsis/sinopsis.jsp?art=37&tipo=2</p> <p>https://www.iberley.es/temas/contenido-caracteres-derecho-sindical-negociacion-colectiva-11381</p> |

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| | <p>Ministry of Labor, Migration and Social Security, Collective Bargaining Guide 2018: http://www.mitramiss.gob.es/es/sec_trabajo/ccncc/B_Actuaciones/Guia/GuiaNC_2018_web.pdf</p> <p>Ministry of Labor, Migration and Social Security Strategic Plan of the Inspectorate of Labor and Social Security: http://www.mitramiss.gob.es/itss/web/Documentos/ORGANISMO_ESTATAL/Doc_Organismo/Plan_Estrat_formato.pdf</p> |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

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| 2.7.2 | The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not supplied using any form of compulsory labour. |
| Finding | <p>Labor rights are adequately protected in Spain including those specified in the fundamental ILO principles. Spain has ratified the 8 ILO Fundamental Conventions.</p> <p>On the other hand, there are some concerns about civil rights in Spain reflected in reports by international organizations such as Amnesty International, see the 2017 report on Spain. None of the concerns is directly related to the forestry sector nor pruning works and replacement of fruit trees in crops where agricultural wood chips is produced. In agriculture there is some perception of the existence of abuses or lack of protection of workers, especially immigrants, linked to greenhouse and intensive agricultural production areas (mostly arable area) reflected regularly in the media</p> <p>The International Confederation of Trade Unions (IUTC) published in 2014 a report on working conditions in 139 countries conducting a study under 97 internationally recognized indicators. Spain received a score of 2, in a range of 1 to 5 (where 1 is the best situation). The value 2 involves repeated violations that may affect the improvement of working conditions. ("Have Certain rights come under attack by the Governments Repeated and / or companies and Have Undermined the struggle for better working conditions).</p> <p>Spain has a long experience of struggle against forced labor. He was one of the first countries to ratify the Forced Labor Convention, 1930 (no. 29) In 1932. It has developed a strong institutional and legal framework to combat trafficking: in particular the constant adaptation of the relevant penal provisions of the Penal Code; with the adoption in 2009 of a first Integral Plan against trafficking in human beings; and the specific role played by inspecting work in detecting criminal behavior arising from labor exploitation or trafficking.</p> <p>There is In addition a Plan of the Government of Spain to combat illegal employment and Social Security fraud. Labor inspectors are the authority designated by the Government to control labor rights and security. companies inspections are performed respect, and are punishable offenses detected and corrected. No violations found relevant laws or rights of free association and collective bargaining related to the forestry sector.</p> <p>Therefore, the relative risk under this indicator is set like "low risk".</p> |
| Means of VERIFICATION | <ul style="list-style-type: none"> • Existing legal framework and level of governance • Employment contracts • Contracts with suppliers • Records of inspections and monitoring field • Interviews with workers |
| Evidence REVIEWED | <p>ILO Spain: http://www.ilo.org/madrid/oit-en-españa/lang-es/index.htm</p> <p>ILO Conventions: http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang-es/index.htm</p> <p>ILO Forced Labor Spain: http://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/forced-labour/WCMS_575880/lang-es/index.htm</p> <p>ITUC Global Rights Index The World's Worst Countries for workers: http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf</p> <p>Spanish constitution: https://www.boe.es/buscar/pdf/1978/BOE-A-1978-31229-consolidado.pdf</p> <p>Status of workers: https://www.boe.es/buscar/pdf/2015/BOE-A-2015-11430-consolidado.pdf</p> <p>Spanish legislation Labor and Social Security: https://www.boe.es/legislacion/codigos/codigo.php?id=93&modo=1-a=0&tab=2</p> <p>Ministry of Labor, Migration and Social Security Strategic Plan of the Inspectorate of Labor and Social Security: http://www.mitramiss.gob.es/itss/web/Documentos/ORGANISMO_ESTATAL/Doc_Organismo/Plan_Estrat_formato.pdf</p> |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |

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| 2.7.3 | The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is not supplied using child labour. |
| Finding | <p>Labor rights are adequately protected in Spain including those specified in the fundamental ILO principles. Spain has ratified the 8 ILO Fundamental Conventions.</p> <p>On the other hand, there are some concerns about civil rights in Spain reflected in reports by international organizations such as Amnesty International, see the 2017 report on Spain. None of the concerns is directly related to the forestry sector nor pruning works and replacement of fruit trees in crops where agricultural wood chips is produced. In agriculture there is some perception of the existence of abuses or lack of protection of workers, especially immigrants, linked to greenhouse and intensive agricultural production areas (mostly arable area) reflected regularly in the media</p> <p>The International Confederation of Trade Unions (IUTC) published in 2014 a report on working conditions in 139 countries conducting a study under 97 internationally recognized indicators. Spain received a score of 2, in a range of 1 to 5 (where 1 is the best situation). The value 2 involves repeated violations that may affect the improvement of working conditions. ("Have Certain rights come under attack by the Governments Repeated and / or companies and Have Undermined the struggle for better working conditions).</p> <p>The Workers Statute provides in Article 6. "Work of minors":</p> <ol style="list-style-type: none"> 1. admission to work is prohibited for children under sixteen. 2. Workers under eighteen may not perform night work or those activities or jobs compared to those limitations established for recruitment in accordance with the provisions of Law 31/1995, of 8 November, Risk Prevention labor, and regulatory standards. 3. overtime is prohibited those under eighteen. 4. The intervention under sixteen years in public performances only in exceptional cases can be authorized by the labor authorities, provided that does not endanger their health or for their professional and human formation. The permit shall be in writing and for certain acts. " <p>There is In addition a Plan of the Government of Spain to combat illegal employment and Social Security fraud. Labor inspectors are the authority designated by the Government to control labor rights and security. companies inspections are performed respect, and are punishable offenses detected and corrected. No violations found relevant laws or rights of free association and collective bargaining related to the forestry sector.</p> <p>Therefore, the relative risk under this indicator is set like "low risk".</p> |
| Means of VERIFICATION | <ul style="list-style-type: none"> • Existing legal framework and level of governance • Employment contracts • Contracts with suppliers • Records of inspections and monitoring field • Interviews with workers |
| Evidence REVIEWED | <p>ILO Spain: http://www.ilo.org/madrid/oit-en-españa/lang-es/index.htm</p> <p>ILO Conventions: http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang-es/index.htm</p> |

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| | <p>ILO Forced Labor Spain: http://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/forced-labour/WCMS_575880/lang--es/index.htm</p> <p>ITUC Global Rights Index The World's Worst Countries for workers: http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf</p> <p>Spanish constitution: https://www.boe.es/buscar/pdf/1978/BOE-A-1978-31229-consolidado.pdf</p> <p>Status of workers: https://www.boe.es/buscar/pdf/2015/BOE-A-2015-11430-consolidado.pdf</p> <p>Spanish legislation Labor and Social Security: https://www.boe.es/legislacion/codigos/codigo.php?id=93&modo=1-a=0&tab=2</p> <p>Ministry of Labor, Migration and Social Security Strategic Plan of the Inspectorate of Labor and Social Security: http://www.mitramiss.gob.es/itss/web/Documentos/ORGANISMO_ESTATAL/Doc_Organismo/Plan_Estrat_formato.pdf</p> |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

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| 2.7.4 | The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not supplied using labour which is discriminated against in respect of employment and occupation. |
| Finding | <p>Labor rights are adequately protected in Spain including those specified in the fundamental ILO principles. Spain has ratified the 8 ILO Fundamental Conventions.</p> <p>The International Confederation of Trade Unions (IUTC) published in 2014 a report on working conditions in 139 countries conducting a study under 97 internationally recognized indicators. Spain received a score of 2, in a range of 1 to 5 (where 1 is the best situation). The value 2 involves repeated violations that may affect the improvement of working conditions. ("Have Certain rights come under attack by the Governments Repeated and / or companies and Have Undermined the struggle for better working conditions).</p> <p>Spain is well positioned in international reporting:</p> <ul style="list-style-type: none"> • Corruption Perception Index shows a value of 58. The perception of the level of corruption has increased substantially in Spain in recent years, although it remains well above 50, which implies a relatively low level of perception; • Governance Indicators World Bank (WGI), show in 2017 values between 61.90 and 83.17 (1-100points). The WGI report of the World Bank is carried out in 200 countries since 1996 and covers the following indicators of governance: i) Accountability, ii) Political Stability and Absence of Violence / Terrorism, iii) Effectiveness of the government, iv) Regulatory Quality, v) rule of law, and vi) Control of corruption. (I) Voice and Accountability, ii) Political Stability and Absence of Violence / Terrorism, iii) Government Effectiveness, iv) Regulatory Quality, v) Rule of Law, and vi) Control of Corruption.) <p>On the other hand, there are some concerns about civil rights in Spain reflected in reports by international organizations such as Amnesty International, see the 2017 report on Spain. None of the concerns is directly related to the forestry sector nor pruning works and replacement of fruit trees in crops where agricultural wood chips is produced. In agriculture there is some perception of the existence of abuses or lack of protection of workers, especially immigrants, linked to greenhouse and intensive agricultural production areas (mostly arable area) reflected regularly in the media</p> <p>Spain does not appear in any reports by international organizations (Global Witness, Human Rights Watch, Chattham House Illegal Logging portal) regarding forestry-related activities.</p> <p>The gender gap in Spain as reported by Eurostat is 14.9%. (The average wage gap between genders in the EU is 16.3%). There is a continued decline of the same, which in 2002 was 19%.</p> <p>In addition, the sector of forestry and logging is the most masculinized, because it only work 6% of women.</p> <p>There is In addition a Plan of the Government of Spain to combat illegal employment and Social Security fraud. Labor inspectors are the authority designated by the Government to control labor rights and security. companies inspections are performed respect, and are punishable offenses detected and corrected. No violations found relevant laws or rights of free association and collective bargaining related to the forestry sector.</p> <p>Therefore, the relative risk under this indicator is set like "low risk".</p> |
| Means of VERIFICATION | <ul style="list-style-type: none"> • Existing legal framework and level of governance • Employment contracts • Contracts with suppliers • Records of inspections and monitoring field • Interviews with workers • Records of payments made |
| Evidence REVIEWED | <p>ILO Spain: http://www.ilo.org/madrid/oit-en-españa/lang-es/index.htm</p> <p>ILO Conventions: http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang-es/index.htm</p> |

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| | <p>ITUC Global Rights Index The World's Worst Countries for workers: http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf</p> <p>Transparency International, Corruption Perceptions Index 2018: https://www.transparency.org/cpi2018</p> <p>Spanish constitution: https://www.boe.es/buscar/pdf/1978/BOE-A-1978-31229-consolidado.pdf</p> <p>Status of workers: https://www.boe.es/buscar/pdf/2015/BOE-A-2015-11430-consolidado.pdf</p> <p>Spanish legislation Labor and Social Security: https://www.boe.es/legislacion/codigos/codigo.php?id=93&modo=1-a=0&tab=2</p> <p>Ministry of Labor, Migration and Social Security Strategic Plan of the Inspectorate of Labor and Social Security: http://www.mitramiss.gob.es/itss/web/Documentos/ORGANISMO_ESTATAL/Doc_Organismo/Plan_Estrat_formato.pdf</p> <p>Eurostat, the wage gap in Spain: ec.europa.eu/newsroom/just/document.cfm?doc_id=48113</p> <p>Wage gap: https://elpais.com/elpais/2018/03/06/media/1520349163_919876.html</p> <p>Discrimination in the work area: https://politica.elpais.com/politica/2018/03/02/actualidad/1519999246_882483.html</p> |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

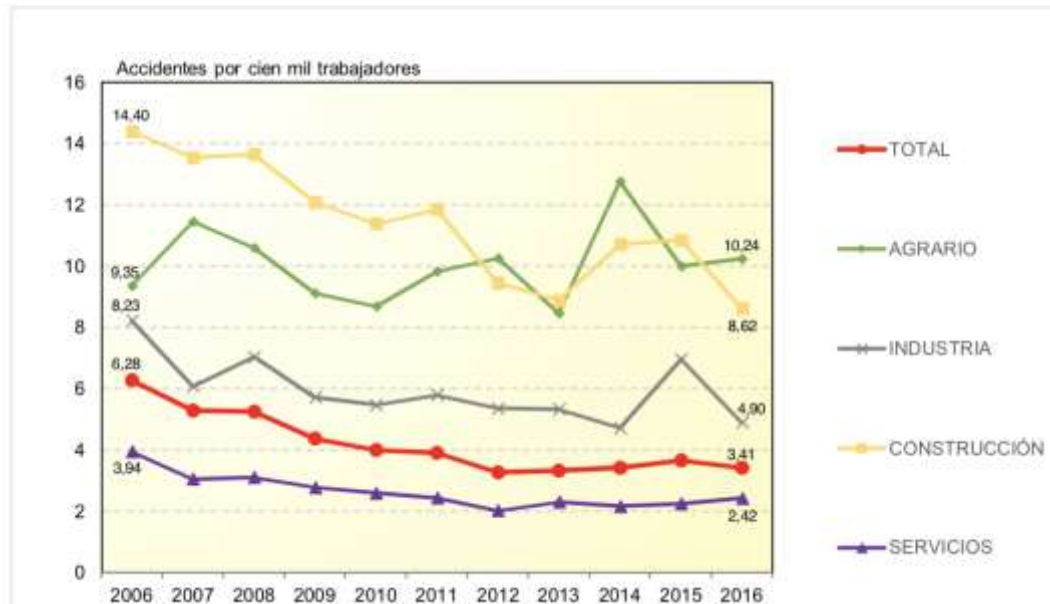
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| 2.7.5 | The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is supplied using labour where the pay and employment conditions are fair and meet, or exceed, minimum requirements. |
| Finding | <p>Labor rights are adequately protected in Spain including those specified in the fundamental ILO principles. Spain has ratified the 8 ILO Fundamental Conventions.</p> <p>The International Confederation of Trade Unions (IUTC) published in 2014 a report on working conditions in 139 countries conducting a study under 97 internationally recognized indicators. Spain received a score of 2, in a range of 1 to 5 (where 1 is the best situation). The value 2 involves repeated violations that may affect the improvement of working conditions. ("Have Certain rights come under attack by the Governments Repeated and / or companies and Have Undermined the struggle for better working conditions).</p> <p>In Spain the government sets each year, after consultation with trade unions and most representative business associations, the "Minimum Wage Interprofessionnel" for both, permanent workers and for temporary or seasonal workers, as well as home employees, taking into account the Consumer Price Index, the average national productivity, increased work participation in national income and general economic conditions. Value set for 2018 is 735.9 euros / month. Usually there are sectoral collective agreements with wages and conditions for workers in the sector.</p> <p>Working conditions are developed in the "Workers Statute".</p> <p>There is In addition a Plan of the Government of Spain to combat illegal employment and Social Security fraud. Labor inspectors are the authority designated by the Government to</p> |

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|-------------------------------|--|
| | <p>control labor rights and security. companies inspections are performed respect, and are punishable offenses detected and corrected.</p> <p>Novalis has an implemented system, with documentation requests to its subcontractors, ie those companies that perform work / forestry activities under contract with Novalis. In this system, the Novalis subcontractor must provide verification for all documents relating to the working conditions of workers, including TC1 and TC2 evidencing the payment of wages and be high in social security.</p> <p>According to available information on conditions of employment, in Spain there is a legal framework and authorities who enforce to fulfill it.</p> <p>Therefore, the relative risk is classified like "low risk" for this indicator.</p> |
| Means of VERIFICATION | <ul style="list-style-type: none"> • Existing legal framework and level of governance • Contracts with suppliers • Records of inspections and monitoring field • Interviews with workers • TC1 and TC2 |
| Evidence REVIEWED | <p>ILO Spain: http://www.ilo.org/madrid/oit-en-españa/lang-es/index.htm</p> <p>ILO Conventions: http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang-es/index.htm</p> <p>ITUC Global Rights Index The World's Worst Countries for workers: http://www.ituc-csi.org/IMG/pdf/survey_ra_2014_eng_v2.pdf</p> <p>Spanish constitution: https://www.boe.es/buscar/pdf/1978/BOE-A-1978-31229-consolidado.pdf</p> <p>Status of workers: https://www.boe.es/buscar/pdf/2015/BOE-A-2015-11430-consolidado.pdf</p> <p>Spanish legislation Labor and Social Security: https://www.boe.es/legislacion/codigos/codigo.php?id=93&modo=1-a=0&tab=2</p> <p>Ministry of Labor, Migration and Social Security Strategic Plan of the Inspectorate of Labor and Social Security: http://www.mitramiss.gob.es/itss/web/Documentos/ORGANISMO_ESTATAL/Doc_Organismo/Plan_Estrat_formato.pdf</p> <p>Royal Decree 1077/2017 of 29 December, which sets the minimum wage for 2018: https://www.boe.es/boe/dias/2017/12/30/pdfs/BOE-A-2017-15848.pdf</p> <p>Ministry of Labor, Migration and Social Security, Labor Guide: http://www.mitramiss.gob.es/es/Guia/index.htm</p> |
| Risk Rating | <p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p> |
| Comment or Mitigation Measure | |

| | Indicator | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--------------|--|-----|---------|------|---------|------|---------|------|---------|------|---------|------|---------|------|---------|------|---------|------|---------|------|---------|------|---------|------|---------|------|---------|------|---------|------|---------|------|---------|-----|---------|------|-------|------|-----|------|-----|------|-----|------|-----|------|-----|------|-----|------|-----|------|-----|------|-----|------|-----|------|-----|------|-----|------|-----|------|-----|
| 2.8.1 | The Biomass Producer has implemented appropriate control systems and procedures for verifying that appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12). | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Finding | <p>In Spain Safety and Health at Work is extensively regulated by different legislation. This legislation covers all activities related to forestry, such as personal protective equipment, use of machinery ...</p> <p>Risk assessment is a basic process for active management of safety and health at work. The assessment procedure is necessary to plan preventive actions and to choose work teams, technical and organizational systems work.</p> <p>Law 31/1995, of November 8, Occupational Health and Safety (BOE 269 of 10/11/1995) establishes the Occupational Risk Assessment as an instrument or "process to estimate the magnitude of the risks can not be avoided , which will provide the information necessary for the employer to take the most appropriate on planning prevention measures in the company". Organizing the necessary resources for developing preventive activities will be undertaken by the employer under any of the following ways:</p> <ul style="list-style-type: none"> ○ personally taking preventive action. ○ Designating one or more workers to carry it out. ○ Forming a prevention service itself. ○ Forming a joint prevention service. ○ Appealing to an external prevention service. <p>Much companies hire external prevention services, who will be in charge of the study of occupational risks of the company, and implementing the necessary measures to minimize and address the adequate training of workers of the company. In the case of Novalis, the contracted prevention service is done with Grupo Preving.</p> <p>The evolution of occupational accident statistics in Spain can be seen in the following graph:</p> <p style="text-align: center;">ACCIDENTES DE TRABAJO CON BAJA EN JORNADA VALORES ABSOLUTOS Evolución 2002 – 2016</p> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p>TOTAL</p> <table border="1"> <caption>TOTAL ACCIDENTES DE TRABAJO CON BAJA EN JORNADA (Miles)</caption> <thead> <tr> <th>Año</th> <th>Valores</th> </tr> </thead> <tbody> <tr><td>2002</td><td>938,188</td></tr> <tr><td>2003</td><td>871,724</td></tr> <tr><td>2004</td><td>904,981</td></tr> <tr><td>2005</td><td>871,724</td></tr> <tr><td>2006</td><td>904,981</td></tr> <tr><td>2007</td><td>871,724</td></tr> <tr><td>2008</td><td>871,724</td></tr> <tr><td>2009</td><td>871,724</td></tr> <tr><td>2010</td><td>871,724</td></tr> <tr><td>2011</td><td>871,724</td></tr> <tr><td>2012</td><td>404,284</td></tr> <tr><td>2013</td><td>404,284</td></tr> <tr><td>2014</td><td>404,284</td></tr> <tr><td>2015</td><td>404,284</td></tr> <tr><td>2016</td><td>488,065</td></tr> </tbody> </table> </div> <div style="text-align: center;"> <p>MORTALES</p> <table border="1"> <caption>MORTALES ACCIDENTES DE TRABAJO (Unidades)</caption> <thead> <tr> <th>Año</th> <th>Valores</th> </tr> </thead> <tbody> <tr><td>2002</td><td>1,101</td></tr> <tr><td>2003</td><td>947</td></tr> <tr><td>2004</td><td>947</td></tr> <tr><td>2005</td><td>947</td></tr> <tr><td>2006</td><td>947</td></tr> <tr><td>2007</td><td>947</td></tr> <tr><td>2008</td><td>947</td></tr> <tr><td>2009</td><td>947</td></tr> <tr><td>2010</td><td>947</td></tr> <tr><td>2011</td><td>947</td></tr> <tr><td>2012</td><td>447</td></tr> <tr><td>2013</td><td>447</td></tr> <tr><td>2014</td><td>447</td></tr> <tr><td>2015</td><td>515</td></tr> <tr><td>2016</td><td>496</td></tr> </tbody> </table> </div> </div> <p>clearly there is a trend downward of the total accidents, even with the sustained rise last 4 years. On the other hand, the relationship between fatal accidents and all accidents remains low nearly throughout this period to a fatal accident per 1,000 accidents with sick leave day. By sector, in 2016 the construction sector has the highest rate of incidence with 7,217.2 accidents with sick leave day per hundred thousand workers. Followed by the industrial sector, with 5290.8 and 5143.4 agriculture with accidents per hundred thousand workers. On the incidence of fatal accidents in the following graph shows the evolution over the period 2006-2016 by sector. Construction and agriculture have the highest incidence rates throughout the period shown, reached in 2016 an incidence rate of fatal accidents 10,24 day per one hundred thousand workers to the agricultural sector and 8.62 for construction.</p> | Año | Valores | 2002 | 938,188 | 2003 | 871,724 | 2004 | 904,981 | 2005 | 871,724 | 2006 | 904,981 | 2007 | 871,724 | 2008 | 871,724 | 2009 | 871,724 | 2010 | 871,724 | 2011 | 871,724 | 2012 | 404,284 | 2013 | 404,284 | 2014 | 404,284 | 2015 | 404,284 | 2016 | 488,065 | Año | Valores | 2002 | 1,101 | 2003 | 947 | 2004 | 947 | 2005 | 947 | 2006 | 947 | 2007 | 947 | 2008 | 947 | 2009 | 947 | 2010 | 947 | 2011 | 947 | 2012 | 447 | 2013 | 447 | 2014 | 447 | 2015 | 515 | 2016 | 496 |
| Año | Valores | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2002 | 938,188 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2003 | 871,724 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2004 | 904,981 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2005 | 871,724 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2006 | 904,981 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2007 | 871,724 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2008 | 871,724 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2009 | 871,724 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2010 | 871,724 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2011 | 871,724 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2012 | 404,284 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2013 | 404,284 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2014 | 404,284 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2015 | 404,284 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2016 | 488,065 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Año | Valores | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2002 | 1,101 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2003 | 947 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2004 | 947 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2005 | 947 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2006 | 947 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2007 | 947 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2008 | 947 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2009 | 947 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2010 | 947 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2011 | 947 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2012 | 447 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2013 | 447 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2014 | 447 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2015 | 515 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2016 | 496 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

ÍNDICES DE INCIDENCIA POR SECTOR DE ACTIVIDAD ACCIDENTES DE TRABAJO MORTALES EN JORNADA

Evolución 2006 – 2016



It is shown how the agricultural sector, which includes forestry, is the only one that has an increased incidence of fatal accidents since 2006.

A more specific study of the forestry sector shows that 50% of accidents in forest works are linked to chainsaw works like felling and processing. In addition, it is noted that forestry and logging is one of the sectors with the highest accident rate.

Labor inspectors are the authority designated by the Government to control labor rights and security. It is found that the agricultural and forestry sector is taken into account when scheduling the inspections work and that there are specific plans for the sector. Inspectors conduct inspections to companies, and are punishable offenses detected and corrected.

Novalis, as was exposed, has an external prevention service (Group Preving) and has also both, a risk assessment for workplaces, and all safety documentation, which includes a description by type of work (felling, loading and unloading, stripping, removes, processing ...) of the operating practices of the system risk prevention, and also deliveries of PPEs properly signed by their workers. In addition, Novalis has a system to collect from their subcontractors all information necessary to ensure compliance with existing legislation on Safety and Health at Work (certificates of medical fitness, training certificates and information regarding POH (PREVENTION OF OCCUPATIONAL HAZARDS) , PPE delivery certificate ...)

In any works in public forest it is designated by the Public Administration a proper Coordinator of Safety and Health that tracks all documentation and check if is in order and that the execution of the forest works are conducted in accordance with legal requirements .

Taking into account all that:

- there is a clear legal framework in Spain and inspections effective working,
- Novalis has a system in place to ensure compliance and their subcontractors and suppliers of the legislation on Safety and Health at Work
- Novalis has instructions on operating practices System Occupational Risk Prevention in which the different tasks specified in its forestry development

the relative risk this indicator is classified as:

1. "low risk" for works in public forests, and
2. specified in terms of labor accidents in forestry works in private forests
3. specified in terms of labor accidents in the works in lands where agricultural biomass is produced.

| | |
|-------------------------------|---|
| Means of VERIFICATION | <ul style="list-style-type: none"> • Existing legal framework and level of governance • Registration courses POH (PREVENTION OF OCCUPATIONAL HAZARDS) and safety at work • Best Practice Manual GFS • Guide sheets for forestry jobs • Management tab Forestry Machinery • Records of training conducted • PPE delivery records • Field inspections • Risks evaluation • Interviews with staff |
| Evidence REVIEWED | <p>Law 31/1995 on Occupational Risk Prevention: https://www.boe.es/buscar/pdf/1995/BOE-A-1995-24292-consolidado.pdf</p> <p>Royal Decree 39/1997 amending Council Regulation of Prevention Services: https://www.boe.es/buscar/pdf/1997/BOE-A-1997-1853-consolidado.pdf</p> <p>Migration and Social Ministry of Labor, Safety, Career Guidance, prevention of occupational hazards: http://www.mitramiss.gob.es/es/Guia/texto/guia_10/index.htm</p> <p>Spanish legislation Labor and Social Security: https://www.boe.es/legislacion/codigos/codigo.php?id=93&modo=1-a=0&tab=2</p> <p>Ministry of Labor, Migration and Social Security Work Accidents Statistics, 2016: http://www.mitramiss.gob.es/estadisticas/eat/eat16/Resumen_resultados_ATR_2016.pdf</p> <p>Ministry of Labor, Migration and Social Security Strategic Plan Labor Inspection and Safety Social: http://www.mitramiss.gob.es/itss/web/Documentos/ORGANISMO_ESTATAL/Doc_Organismo/Plan_Estrat_formato.pdf</p> <p>Risk prevention in forestry: http://www.insht.es/SectorAgrario/Contenidos/ficheros/POH(PREVENTION OF OCCUPATIONAL HAZARDS) %20en%20actividad%20forestal.pdf</p> <p>ILO Safety and Health in Forest Work: http://www.ilo.org/wcmsp5/groups/public/---ed_protect/---protrav/---safework/documents/normativeinstrument/wcms_112615.pdf</p> <p>Ministry of Labor, Migration and Social Security, Labor Inspectorates Integrated Plan 2016: http://www.mitramiss.gob.es/itss/ITSS/ITSS_Descargas/Atencion_ciudadano/Planificacion_actuaciones/actas-planes/PLAN_INTEGRADO_2016.pdf</p> |
| Risk Rating | <p><input type="checkbox"/> low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA <input type="checkbox"/></p> |
| Comment or Mitigation Measure | <p>Novalis has implemented a system covering any aspects to be considered to ensure it is attended all legislation LRP and Occupational Health and Safety. Novalis also has an external prevention service (Preving Group), and also has both, a risk assessment for workplaces, and all safety documentation, including:</p> <ul style="list-style-type: none"> ✓ Manual of good practices in GFS, behaviors recommended for workers and employees from subcontractors, ✓ Guide sheets for forestry works, with full documents used in forest jobs with a description by type of work: felling, loading and unloading, stripping, Saca processing ... ✓ Guide sheets for Forestry Equipment Management, comprehensive document used fieldwork ✓ Delivery tab EPIs <p>In addition, Novalis has a system to collect from their subcontractors and all suppliers the information necessary to ensure compliance with existing legislation on Safety and Health at Work: Certificates of medical fitness, training certificates and information regarding POH (PREVENTION OF OCCUPATIONAL HAZARDS) , PPE delivery certificate ...</p> |

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| | <p>For suppliers (when necessary to reach the pruning operation / apeo feet) we proceed as follows:</p> <ol style="list-style-type: none"> 1. It is applied to suppliers the documentary process already implemented in the CoC assessment (NCC-PG-03 Supplier evaluation of the CoC) with which ensures that it is covered a minimum required: self-declaration, available certificates of having prevention services, be the date on payments. 2. Suppliers with OSHAS are considered adequate 3. For the rest of providers will be asked about accidents (accident report) and proceed as follows: <ul style="list-style-type: none"> ▪ Take action in case of accidents serious ▪ Track minor accidents to take measures in case of recurrence unjustified <p>Novalis, when buying wood chips from other suppliers, and therefore work on the forest / farm are not under their responsibility, includes in any agreements with its suppliers the right to access all information relevant to the matter.</p> <p>The developed system is considered complete and sufficient to ensure the use of safety measures and equipment for the work done and mitigate risks related to labor accidents.</p> |
|--|---|

| | Indicator |
|--------------|---|
| 2.9.1 | Biomass is not sourced from areas that had high carbon stocks in January 2008 and no longer have those high carbon stocks. |
| Finding | According to data provided by the Ministry of Environment Transition (Miteco) in the inventory of greenhouse gas emissions by 2018, with data on the 1990-2016 series, forest land and forest management are the largest carbon sink, with values that remain more or less stable since 1990 annually absorbing an amount of 39,000 Gg CO ₂ -eq. This use still presents a stage of growth of the biomass and other carbon stocks in Spain and is positioned as the main domestic sink |

Tabla RE.2.2.- Evolución de las absorciones netas en LULUCF

Valores absolutos (cifras en Gg CO₂-eq)

| 1990 | 1995 | 2000 | 2005 | 2007 | 2008 | 2009 |
|---------|---------|---------|---------|---------|---------|---------|
| -39.350 | -36.544 | -42.971 | -41.371 | -40.312 | -39.813 | -39.511 |
| 2010 | 2011 | 2012 | 2013 | 2014 | 2015 | 2016 |
| -40.450 | -38.902 | -36.163 | -38.562 | -41.543 | -42.007 | -40.744 |

Índice de evolución anual (año 1990 = 100)

| 1990 | 1995 | 2000 | 2005 | 2007 | 2008 | 2009 |
|--------|-------|--------|--------|--------|--------|--------|
| 100,0% | 92,9% | 109,2% | 105,1% | 102,5% | 101,2% | 100,4% |
| 2010 | 2011 | 2012 | 2013 | 2014 | 2015 | 2016 |
| 102,8% | 98,9% | 91,9% | 98,0% | 105,6% | 106,8% | 103,6% |

These values are net removals, as it can be seen in the chart below 10,300 Gg CO₂-eq to forestation and 28,500 Gg CO₂-eq to forest management.

Tabla RE.2.4.- Emisiones (+) y absorciones (-) en las actividades LULUCF-KP (Gg CO₂-eq)

| | 1990 | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 | 2014 | 2015 | 2016 |
|--|------|---------|---------|---------|---------|---------|---------|---------|---------|---------|
| A. Actividades artículo 3.3 | NA | -12.732 | -12.661 | -12.724 | -12.365 | -11.794 | -12.077 | -11.582 | -10.678 | -9.743 |
| A.1. Forestación/Reforestación | NA | -13.431 | -13.357 | -13.351 | -12.991 | -12.422 | -12.646 | -12.145 | -11.239 | -10.302 |
| A.2. Deforestación | NA | 699 | 697 | 627 | 627 | 628 | 569 | 563 | 561 | 559 |
| B. Actividades artículo 3.4 | -870 | -26.049 | -25.978 | -27.015 | -25.958 | -23.905 | -26.166 | -29.744 | -31.223 | -31.003 |
| B.1. Gestión bosques | NA | -29.091 | -26.963 | -27.158 | -26.893 | -26.370 | -26.832 | -27.957 | -28.944 | -28.557 |
| B.2. Gestión tierras agrícolas | -870 | 3.042 | 986 | 143 | 935 | 2.464 | 666 | -1.787 | -2.279 | -2.446 |
| B.3. Gestión de pastizales | | | | | | | | | | |
| B.4. Revegetación | | | | | | | | | | |
| B.5. Drenaje y rehúmedación de humedales | | | | | | | | | | |

Therefore, from these data it can be concluded that there are two carbon sinks related to forest land:

1. reforestation carried underway in Spain for decades, with a downward trend since the increase of forest area will stabilize over time.
2. forest management is performed on the whole the country and has remained stable since 1990 in similar values of carbon absorption.

On the other hand, studies indicate that in Spain climate and vegetation largely determine the amount of carbon stored in the soil. Wetlands of northern store more carbon compared to soils in drier areas of the south and east. On average, each soil square meter has captured 8.7 kg of carbon. This value can range from 6.5 kg to 11.6 kg depending on the area. Under the forest soils of Asturias, Galicia, Cantabria and the Basque Country, in order, are the highest carbon stocks per m² of Spain (representing, cooler and wetter Atlantic areas). Moreover, Murcia, Extremadura and Andalusia are the communities that accumulate less kg per m² of carbon in their forest soils (representing the drier and warmer area with a typical Mediterranean vegetation).

Taking all this into account, and the fact of Novalis is not working on mature forests under a risk of disappearing due to inadequate management, the relative risk set like "low risk" under this indicator.

Means of
VERIFICATION

- Existing legal framework
- Available information: maps, web pages, statistics
- Procedures and records on carbon storage
- Interviews with experts

Evidence
REVIEWED

Miteco:

- Carbon sinks: <https://www.miteco.gob.es/es/cambio-climatico/temas/mecanismos-de-flexibilidad-y-sumideros/sumideros-de-carbono/>
- Spanish Emissions Inventory System: <https://www.miteco.gob.es/es/calidad-y-evaluacion-ambiental/temas/sistema-espanol-de-inventario-sei/>

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| | <ul style="list-style-type: none"> National Inventory of Greenhouse Gases (GHG): https://www.miteco.gob.es/es/calidad-y-evaluacion-ambiental/temas/sistema-espanol-de-inventario-sei-/Inventario-GEI.aspx Inventory greenhouse gas emissions 2018_resumen Inventory greenhouse gas emissions by 2018 <p>Soil coal stocks and Their variability across the forests, shrublands and grasslands of peninsular Spain: https://www.biogeosciences.net/10/8353/2013/bg-10-8353-2013.pdf</p> |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

| | Indicator |
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| 2.9.2 | Analysis demonstrates that feedstock harvesting does not diminish the capability of the forest to act as an effective sink or store of carbon over the long term. |
| Finding | According to data provided in the indicator 2.9.1. Spanish forests maintain stability linked to forest management over the period 1990-2016 that takes them as carbon sinks. So the relative risk is classified like "low risk" under this indicator. |
| Means of VERIFICATION | <ul style="list-style-type: none"> Existing legal framework Available information: maps, web pages, statistics Results of the analysis of carbon stocks Historical data series |
| Evidence REVIEWED | <p>Miteco:</p> <ul style="list-style-type: none"> Carbon sinks: https://www.miteco.gob.es/es/cambio-climatico/temas/mecanismos-de-flexibilidad-y-sumideros/sumideros-de-carbono/ Spanish Emissions Inventory System: https://www.miteco.gob.es/es/calidad-y-evaluacion-ambiental/temas/sistema-espanol-de-inventario-sei/ National Inventory of Greenhouse Gases (GHG): https://www.miteco.gob.es/es/calidad-y-evaluacion-ambiental/temas/sistema-espanol-de-inventario-sei/Inventario-GEI.aspx Inventory greenhouse gas emissions 2018_resumen Inventory greenhouse gas emissions by 2018 <p>Soil coal stocks and Their variability across the forests, shrublands and grasslands of peninsular Spain: https://www.biogeosciences.net/10/8353/2013/bg-10-8353-2013.pdf</p> |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

| | Indicator |
|---------------|---|
| 2.10.1 | Genetically modified trees are not used. |
| Finding | <p>There is no legal prohibition on the use of genetically modified material, but there is a legal framework regulating their use and it is necessary to obtain a government license to do so.</p> <p>It exists the National Biosafety Commission that "in accordance with the second additional provision of Law 9/2003, it is an advisory collegial organization whose function is to report on applications for authorization submitted to the General State Administration and the Autonomous Communities on organisms genetically modified (contained use, voluntary release and marketing). It is attached to the Ministry of Agriculture and Fisheries, Food and Environment, and composed of representatives of the various ministries concerned,</p> |

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| | <p>representatives of the autonomous communities and people and expert institutions in the field. "</p> <p>In addition there is a Public Registry of GMOs "is created under Royal Decree 178/2004, of 30 January, by which approves the General Regulation for Development and Law Enforcement 9/2003, in its first additional provision, in accordance with the third additional provision of that law. It feeds on how much data available on the basis of their competence, the Interministerial Council on GMOs, the National Biosafety Committee, the relevant ministerial departments because of the matter and the competent bodies of the Autonomous Communities and resulting from the processing of communications and requests for authorization for contained use, voluntary release and marketing of GMOs. "</p> <p>No records or evidence of use of genetically modified materials in forestry or in the agricultural field of materials used by Novalis: citrus, stone fruit and almond, walnut and olive trees.</p> <p>Based on the above, the relative risk is classified like "low risk" under this indicator.</p> |
| Means of VERIFICATION | <ul style="list-style-type: none"> Existing legal framework. Laws, regulations and agencies. |
| Evidence REVIEWED | <p>Legislation on Genetically Modified Organisms (GMOs): https://www.miteco.gob.es/es/calidad-y-evaluacion-ambiental/temas/biotecnologia/organismos-modificados-geneticamente-omg-/legislacion-general/</p> <p>National Biosafety Commission: https://www.miteco.gob.es/es/calidad-y-evaluacion-ambiental/temas/biotecnologia/organismos-modificados-geneticamente-omg-/comision-nacional-bioseguridad/</p> <p>Public Register of GMOs: https://www.miteco.gob.es/es/calidad-y-evaluacion-ambiental/temas/biotecnologia/organismos-modificados-geneticamente-omg-/registro-publico-OMG/</p> |
| Risk Rating | <p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p> |
| Comment or Mitigation Measure | |