

Supply Base Report: BIMATRA byba

First Surveillance Audit

www.sbp-cert.org



Completed in accordance with the Supply Base Report Template Version 1.3

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

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1 Overview

On the first page include the following information:

Producer name: [BIMATRA bvba]

Producer location: [Industrielaan 6, 8770 Ingelmunster, Belgium]

Geographic position: [50°55'50.5"N 3°14'51.0"E (50.930694, 3.247488)]

Primary contact: [Bart De Clerck, +32 495294050, bart@bimatra.be]

Company website: [www.bimatra.be]

Date report finalised: [02/012/2020, updated]

Close of last CB audit: [03/012/2019, Ingemunster, Belgium]

Name of CB: [Nepcon]

Translations from English: [Yes]

SBP Standards used: [Standard 1 version 1.0, Standard 2 version 1.0, Standard 4 version 1.0, Standard 5

version 1.0]

Weblink to Standard(s) used: <a href="https://sbp-cert.org/documents/standards-documen

SBP Endorsed Regional Risk Assessment: [not applicable]

Weblink to SBE on Company website: [www.bimatra.be/certificates/SBP]

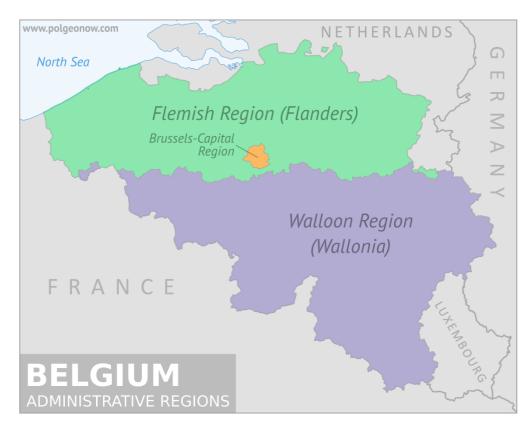
Indicate how the current evaluation fits within the cycle of Supply Base Evaluations						
Main (Initial) Evaluation	First Surveillance	Second Surveillance	Third Surveillance	Fourth Surveillance		
	x					

2 Description of the Supply Base

2.1 General description

General summary Bimatra activities.

Bimatra is a forest contractor that produces and sells wood chips in Belgium, in Flanders (including Brussels) and Wallonia.



Wood chip production is approx. 90 000 tonnes a year. Around 35% of the primary wood chip is produced in areas outside forests, mainly roadside, riverside and train site cuttings and small plantations and in connection with nature projects. The base also includes clearing of trees and shrubs in connection with developments and expansion of infrastructure in Belgium. In the forests (65% of primary feedstock), the base is thinning of mainly broadleaves while the rest is branches and tops from both broadleaves and conifers. In Wallonia you find more often conifers.

Bimatra's supply base is the Belgian forests, roadside wood, riverside wood, nature areas and urban plantations, all over Belgium, mainly in Flandres but also a part of Wallonia (French speaking part of Belgium). Some supply (around 10% each year) comes from the South of the Netherlands, mainly Zeeland and then a part of France (nearby Belgium border). Nevertheless this SBP certification process focus on the feedstock from Belgium only, as for the other countries no SBE is made. Thus this 10% is excluded from the process.

Belgian forest owners are well--organised in various local and national associations. The 'bosgroep' is well known trade organisation of private forest owners. When looking at land ownership around 60% of the feedstock is coming from Public landowners, and 40% from private owners. As Belgium contains a large number of Natura2000 sites it is estimated that around 28% of the feedstock is coming from such sites.

Two certification options exist in forest management in Belgium: PEFC and FSC. The areas owned by the Belgian states have been mostly certified according to one or to both standards. In private and municipal forests, some have been certified according to PEFC and some according to FSC but there are also lots of (mostly small) forests that are not certified. But in Belgium you always have the obligation to plant the same number of trees you cut on the same ground or on another.

Detailed description of the supply base

Forest classification and landownership

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

Around 22,7% of Belgium is covered with forests, **totalling a number of 692.916 hectares**. From this 78% can be found in the Walloon region, 21% in the Flemish region and 1% in the Brussels-Capital Region.

- 58% of all forests are owned by around 100.000 private owners, with an average of 2,5 ha per owner.
- 42% of the forests are owned by the <u>public</u> ('gewesten/regions' (11%), municipalities (28%), provinces and other organisation like the military (3%).

Given the historical context, all Belgian forests have been exposed to some level of forest management activities, varying from low impact to very intensive forestry. Therefore only one <u>general</u> forest type can be found in Belgium: 'Semi-natural forest (planted)'. There are no 'old growth natural' forests, although lately natural regeneration is responsible for 'new' natural forests and forest management in all regions has evolved in general towards a multifunctional, semi-natural forest management.

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

In general, the share of planted forest is higher in privately owned forest land compared to the share of the more seminatural and more mixed forest lands in public lands (which were also exposed to some level of forest management). But also in public forest land, the share of planted forest is important. Nevertheless there is a strong tendency to make those forests more divers (e.g in Flanders, but also in the other regions), or maintain a balance between 'mixed deciduous' and 'conifers' (in Wallonia). When looking at tree species in planted forests, then there is a dominance of poplar and pine species in Flanders, while in the Walloon region spruce and to some extent other conifers are dominant.

With regards to legal land-use classification where forests are occurring there are two: 'Forests (permanent, forest as land-use category)' and 'Other lands with trees or forest' (trees or forest on land destined for other land-use categories). The last category are lands not classified as forest as such in the cadastre, but where trees or forests are growing. These are for example abandoned industrial lands or overgrown agricultural lands, or lands destined for building area or industrial grounds.

Forest landowners in Belgium can be Public (regional, provincial, municipality and military) and Private lands.

The official definition of forest in Flanders is: 'forests are land areas where trees and woody shrub vegetation are the main elements, with its own flora and fauna and fulfilling one or more functions' (Forest decree/law 1990). The official definition of forest in Wallonia is: 'These are lands of woods and forests such as areas covered by natural habitats, wood deposits, fauna feeding places, marshes, ponds and firebreaks.' (Code forestier 2008).

Protection categories

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

More recently (2016) a new methodology is developed to score the ecological value of forests which is applied to forests that are <u>outside</u> the permanent forest estate (forests on land that is currently not classified as forest as a land-use category). These new actions are based on the new article 90ter of the official "Bosdecreet". This scoring system looks at 5 different criteria: size, history, ecological value (existing map), desired nature & forest types (GNBS) and location related to value forests (so called INBO-map). As a result of this 'scoring' an online map with around 12.500 ha of 'most vulnerable and valuable forests' has been prepared by the Flemish government (Meest Kwetsbare Waardevolle Bossen

(MKWB)). These are lands where HCVs can occur. The Flemish government has already taken the <u>decision to increase</u> the <u>level of protection</u> for those forests against permanent deforestation, and both the map as the system have been rolled out in 2017. Together with the map a compensation system has been agreed upon to compensate landowners for the potential loss of value of such lands. With these additional legislation and compensation measures harvesting of such forest could only be allowed after special approval of the Flemish parliament.

In <u>Wallonia</u> the following protection categories are in place: Natura 2000, European Bird and Habitat regulation, protected natural sites (public nature reserves, recognized nature reserves, and forest reserves) and ancient forests. In the Brussels capital region Natura2000 and Speciale Beschermings Zone's (SBZ) can be found.

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

Nature 2000

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

In <u>Wallonia</u> the idea is the same, but the selection of sites is done by 8 special committees, each in its own part of Wallonia. There is no separate law, work is done according to the EU laws. Sites are officially named 'Nature 2000' sites. In total 148 sites (out of 240) are covered by a decree of designation in 2016.

Implementation of Nature 2000 in Belgium as a whole is well underway and in a similar state as compared to other EU countries (there is a 6 –year work program with detailed goals and targets).

FSC certification

FSC forest certification in Belgium is mostly present in the Flemish and Brussels part, where resp. 13-15% and >99% of the forests are FSC certified. In the Walloon region the first pilot project around FSC certification is only about to start.

International agreements

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

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

Scale of harvesting compared to other forest based industries in the region.

Based on <u>FAO resource assessment</u> 2015. In average around 3 680 000 m3 of wood is harvested each year in Belgium. Bimatra uses around 92.759 tons of woodchips per year. With an average density of 0.6 g/cm³ (or 600 kg/m³) this means around 148.000 m3 of harvested timber (wet), that is approximately 4% of the national harvest.

CITES

There are no CITES (tree/wood) species occurring in Belgian forests.

Other supply base categories.

Bimatra also buys from non-forest areas, like harvested trees besides canals, roads etc. Such areas are not considered 'forests' and are not counted in hectares in national publications. There is thus no data available for this.

Proportions of SBP feedstock product groups

SBP-compliant primary feedstock is the only product group that Bimatra has in its scope, so 100% of SBP claims are of this kind.

Feedstock types:

Α	В	С	D	E	F	G	М
#	Feedstock type for biomass production	Origin	Physical Description	Country of harvest (new row for each country)	Raw mass as received in metric tonnes	Moisture % as received (weighted average, single figure) ²	Specify any pre- processing. (chipping, drying, none)
1	Thinning from (semi-)natural forests	Residues without stumps (e.g. branches and tops)	Chips	Belgium	21.604	42,47	chipping
2	Final harvest from plantations	Residues without stumps (e.g. branches and tops)	Chips	Belgium	15.558	42,47	chipping

Data is extracted from the Bimatra administration,

from 2020 biomass sold as SBP-compliant to the customer.

Species mix

The following species mix is used.

Latin scientific name	CATEGORY*	French name	Flemish name	English name
Abies alba	1	Sapin	Zilverspar	Spruce
Acer campestre	2	Érable	Veldesdoorn	Maple
Acer platanoides	2	Érable plane	Noorse Esdoorn	Plane maple
Acer	2	Sycamore	Gewone	Sycamore
pseudoplatanus			esdoorn	
Alnus glutinosa	2	aulne	Zwarte Els	Alder
Aesculus	2	Marroniér	Witte	
hippocastanus		d'Inde	paardenkastanje	
Betula pendula	2	Bouleau	Ruwe Berk	Birch
Carpinus betulus	2	Charme	Haagbeuk	Hornbeam
Castanea sativa	2	Châtaigner	Tamme kastanje	Chestnut
Fraxinus excelsior	2	Frêne	Es	Ash
Picea abies	1	Epicea	Fijnspar	Silver fir
Pinus sylvestris	1	Pin sylvestre	Grove Den	Scots pine
Populus alba	2	Peuplier	Witte Abeel	White poplar
		blanc		
Populus nigra	2	Peuplier noir	Zwarte populier	Black poplar
Populus x	2	Peuplier	Canadapopulier	Hybrid poplar
euramericana		clonale		
Prunus avium	2	Merisier	Zoete Kers	Cherry

Prunus serotina	2	cerisier tardif	Amerikaanse	American cherry
			Vogelkers	
Pseudotsuga	1	Douglas	Douglasspar	Douglas fir
menziesii				
Quercus petraea	2	Chênes	Wintereik	Sessile oak
		sessiles		
Quercus robur	2	Chênes	Zomereik	English oak
		pédonculés		
Quercus rubra	2	chênes rouge	Amerikaanse	American red oak
		d'Amérique	Eik	
Robinia	2	Robinier	Robinia	Black locust
pseudoacacia				
Salix alba	2	Saule	Wilg	Willow
Sorbus	2	Sorbier des	Wilde Lijsterbes	Rowan
aucuparia		oiseleurs		
Tilia cordata	2	Tilleul	Winterlinde	Lime
Ulmus minor	2	Orme	Gladde lep	Elm

^{* 1-}CONIFERS

2 -BROADLEAVES

Suppliers

Bimatra has got around 6 main suppliers which provide around 80% of wood/timber and typically around 20 small companies that supply around 20% of the stock traded by Bimatra.

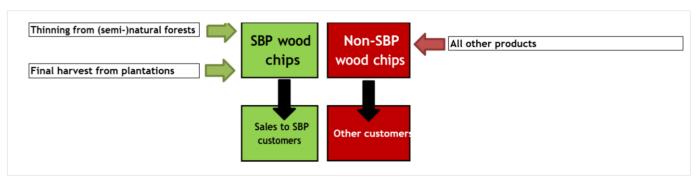
2.2 Actions taken to promote certification amongst feedstock supplier

Bimatra holds an FSC CoC certification as a group member and a PEFC certification as a participant in product group certification CoC. This means that Bimatra is committed to promote the principles of certification. The main suppliers are already certified (the ones which provide around 80% of wood traded by Bimatra), but sell very small quantities of certified wood at the moment as there are few forests certified.

2.3 Final harvest sampling programme

Not applicable.

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



2.5 Quantification of the Supply Base

Supply Base

a. Total Supply Base area (ha): cumulative area of all forest types within SB	692.916 hectares
b. Tenure by type (ha): privately owned/public/community concession	 58% of all forests are owned by around 100.000 private owners, with an average of 2,5 ha per owner. 42% of the forests are owned by the public ('gewesten/regions' (11%), municipalities (28%), provinces and other organisation like the military (3%).
c. Forest by type (ha):	100% temperate
boreal/temperate/tropical	
d. Forest by management type (ha):	35% plantation, 65% from semi natural
plantation/managed natural/natural	managed forests. No natural forest exists in
	Belgium.
e. Certified forest by scheme (ha): (e.g.	FSC: 25 815 ha
hectares of FSC or PEFC-certified forest)	PEFC: 300 999 ha

Feedstock

f.	Total volume of Feedstock: tonnes or m3 -	0 – 200,000 tonnes
	volume may be shown in a banding	This is a used band, real figures are
	between XXX,000 to YYY,000 tonnes or	confidential because of commercial
	m ³ if a compelling justification is provided*	reasons, and only included in the SAR document.
g. '	Volume of primary feedstock : tonnes or	0 – 200,000 tonnes
	m ³ - volume may be shown in a banding	This is a used band, real figures are
	between XXX,000 to YYY,000 tonnes or	confidential because of commercial
	m ³ if a compelling justification is provided*	reasons, and only included in the SAR
		document.
h.	List percentage of primary feedstock (g),	Certified: 0% of total annual feedstock Not
	by the following categories percentages	certified: 100%.
	may be shown in a banding between XX%	(Over the last reporting period around 10%
	to YY% if a compelling justification is	came from certified sources, but were not
	provided*. Subdivide by SBP-approved	sold to Bimatra with such a claim).Therefore
	Forest Management Schemes:	0% at the moment.
	 Certified to an SBP-approved 	
	Forest Management Scheme	
	 Not certified to an SBP-approved 	
	Forest Management Scheme	
i.	List all species in primary feedstock,	See table under 2.1
	including scientific name	

j.	Volume of primary feedstock from primary	0% (no primary forests remain in Belgium)
	forest	
k.	List percentage of primary feedstock from	NA
	primary forest (j), by the following	
	categories. Subdivide by SBP-approved	
	Forest Management Schemes:	
	 Primary feedstock from primary 	
	forest certified to an SBP-	
	approved Forest Management	
	Scheme	

* Compelling justification would be specific evidence that, for example, disclosure of the exact figure would reveal commercially sensitive information that could be used by competitors to gain competitive advantage. State the reasons why the information is commercially sensitive, for example, what competitors would be able to do or determine with knowledge of the information.

Bands for (f) and (g) are:

- 1. 0 200,000 tonnes or m³
- 2. 200,000 400,000 tonnes or m³
- 3. 400,000 600,000 tonnes or m³
- 4. 600,000 800,000 tonnes or m³
- 5. 800,000 1,000,000 tonnes or m³
- 6. >1,000,000 tonnes or m³

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

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

NB: Percentage values are calculated as rounded-up integers.

3 Requirement for a Supply Base Evaluation

SBE completed	SBE not completed
х	

A SBE is required because Bimatra is buying from different sources, that are not all PEFC/FSC certified, or otherwise certified. They also buy from small scale landowners, private or state, sometimes directly and sometimes indirect. There is thus a wide variety of a supply base and this require a detailed evaluation to identify risks and, in case, to mitigate them.

4 Supply Base Evaluation

4.1 Scope

The scope of SBE is:

- the Supply Base, which includes forest areas and plantations from Belgium, where the following operations are performed: thinnings in semi-natural forests and final harvest of (mainly poplar) plantations;
- wood processing (chipping) and trading operations by Bimatra.

4.2 Justification

The approach used in this SBE is risk assessment, according to legality and sustainability principles. The following sources of information were used to assess the risks:

- · Applicable legislation and regulations;
- <u>Centralized National Risk Assessment (CNRA) for Belgium</u> published in May 2017 which
 is available from FSC. The CNRA was completed in accordance with SBP Standard no. 1
 and the evaluation was completed in accordance with SBP standard no. 2;
- · Publications of national organizations and authorities;
- Scientific studies;
- Interviews with relevant persons.

Besides that, the SBR and SBE were published for stakeholder consultation.

4.3 Results of Risk Assessment

The risk assessment in 2019 identified 0 risks, but 2020 updating identified six (6) specified risks, already with mitigation measures in place (even before SBP certification), related to the following indicators:

- 1.3.1 The BP has implemented appropriate control systems and procedures to ensure that feedstock is legally harvested and supplied and is in compliance with EUTR legality requirements;
- 2.1.1 The Biomass Producer has implemented appropriate control systems and procedures for verifying that forests and other areas with high conservation values are identified and mapped;
- 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;
- 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:
- 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);
- 2.2.4 The Biomass Producer has implemented appropriate control systems and procedures to ensure that biodiversity is protected (CPET S5b).

All the other indicators were found to be low risk.

Based on the CNRA Bimatra concluded that the supply base do not need to be divided into various types of sub scopes. The following consideration took place, where different types of potential sub-scopes were assessed:

- Type of feedstock: 2 feedstocks are taking into account for this SBP certification process.
 And all of them are leading to woodchips. Sub-scope are not needed as risks are the same for all.
- Raw material: All woodchips are made from either logs or branches, and they are coming
 from the entire supply base. Not a proper sub-scope as risks are the same for all, all come
 from trees and shrubs.
- Geographical: the supply base is Belgium as a whole. The risk assessment is already done
 for the entire country. Not a proper sub-scope as risks are the same for the entire supply
 base.

4.4 Results of Supplier Verification Programme

Not applicable, as there were no unspecified risks.

4.5 Conclusion

Every indicator was evaluated at the level of the 3 regiones that compose Belgium (mainly Flanders and Wallonia, plus Brussels region). Many sources of information were used to assess each indicator, regarding the scope of this SBE. Bimatra meets the SBP requirements.

For few indicators potential risks were found, but Bimatra had implemented some standard operational procedures for mitigating these risks. This even before willing to achieve the SBP certification.

As an overview the SBE concluded that:

- Laws and regulations on forestry in Belgium within the Supply Base protect the environment well and the system of law enforcement is strong and effective;
- Woodchips mainly come from forest stands subject to selvicultural operations; the ecological, economic and social impact of these operations are positive, since they are aimed to maintenance of the forests or woodlands;
- Woodchips also come from plantations (poplars) that usually are re-planted at local level.
- Bimatra trades common tree species only and not protected species;
- Bimatra has several years of experience in the field and holds PEFC/FSC certificates;
- Procedures to minimize impacts and mitigate risks were already in place even before the SBP certification and were just improved or extended (e.g. Contractors manual, Forest Management Practices).

A kind of weakness could be that at the beginning of Bimatra's process of SBP certification there were no other evaluation for Belgium, other then CNRA. The lack of data and reports in Belgium, thus, doesn't mean that procedures are not implemented.

The team working on the SBE strongly believe that the Biomass Producer Bimatra can ensure its feedstock sourced in Belgium can comply with the SBP Standards requirements on legality and sustainability.

5 Supply Base Evaluation Process

Bimatra has contracted the <u>Forestry Service Group</u> to assist with the SBE. They are also working with FSC international to compile CNRAs for many countries around the world, including Belgium. They have 25 years of experience in this type of work.

The CNRA has been completed by FSC international in 2017 and the actual work was carried out by several expert-contractors. The CNRA process is a lengthy one that takes more than a year to complete. The process include stakeholder consultation and the risk assessment is done in a team effort where international consultant work with a larger group of local experts. It includes a public consultation round as well. All information about the procedures and results can be found here: https://fsc.org/en/document-centre/documents/resource/397

As it appears from the CNRA, a low risk has been identified for all 5 main categories and all 32 underlying indicators. The CNRA for Belgium was used as the backbone of this document.

One consultant was involved in supervising documents in 2019 and updating the 2020 documents: Simona Ferutta, M.Sc. in Forestry and Environmental Sciences, 24 years of experience in forestry and various certification (ISO, PEFC, FSC, ISCC, SBP).

6 Stakeholder Consultation

The first consultation phase ran for a period of 30 days 17th of October till the 17th of November 2019. The SBR summary plus an introduction letter was sent by e-mail to a list of stakeholders, with the request to comment. Bimatra took a great effort to make sure stakeholders of the following groups were approached (one for each group was a least targeted): suppliers, customers, sector associations, national NGOs (WWF, Natuurpunt, etc), universities, umbrella organizations, municipalities and larger governmental services (state forest).

BIMATRA STAKEHOLDER LIST

CATEGORY OF STAKEHOLDER	NAME	CITY / HEADQUARTER /STATE	E-mail address	Affected or Interested
Supplier	Dedoncker P&G BVBA	Gooik	gerrit@populier.be	Affected
Supplier	De Clercq – Bourdeaud'H ui NV	Brakel	isabel@dcbb.be	Affected
Supplier	De Clercq hout CV	Brakel	de.clercq.stefaan@telenet.be	Affected
Supplier	GVO Forest	Bever	vanouytselgeert@icloud.com	Affected
Supplier	Geert Van de Wynckel	Maldegem	Geert.vdw@hotmail.com	Affected
Customer	DUFERCO BIOMASSE	Italy	p.micheli@dufercobiomasse.com	Affected
Customer consultant	FERUTTA Simona	Italy	simona.ferutta@fastwebnet.it	Interested
Customer	Bois Energie France – Est	France	dimitri.pascal@dalkia.fr	Affected
Customer	Bois Energie France – Nord-Ouest	France	Maxence.pottier@boisenergienordoue st.fr	Affected
Customer	Picardie Biomasse Energie	France	Amelie.cathala@pbenergie.com	Affected
Customer	2Valorise Materials	Amel	Alexander.verbesselt@2valorise.be	Affected
International association	PEFC Belgium	Brussels	info@pefc.be	Interested
International association	FSC Belgium	Heverlee	info@fsc.be	Interested
University	Division Forest,	Leuven- Heverlee	fnlcommunications@kuleuven.be	Interested

	Nature and			
	Landscape			
	GEO-Instituut			
Municipality	Ingelmuster	Ingelmuster	gemeente@ingelmunster.be	Interested
Governamenta	Belgian	Brussels	anb@vlaanderen.be	Interested
I service	Nature and	Braddeld	a.i. 3	Interested
	Forestry			
	Agency			
Research	INBO	Brussels	info@inbo.be	Interested
Institute				

6.1 Response to stakeholder comments

No response were received at the end of the consultation period, but any later comment will be taken into account anyway.

7 Overview of Initial Assessment of Risk

In 2020 Six specified risks were identified, but for some of them mitigation measures were already in place, even if not identified as such in the first assessement. Further mitigation measures were implemented.

Table 1. 2020 Overview of results from the risk assessment of all Indicators (prior to SVP)

In all and an	Initial Risk Rating		
Indicator	Specified	Low	Unspecified
1.1.1		Х	
1.1.2		Х	
1.1.3		Х	
1.2.1		Х	
1.3.1	X		
1.4.1		Х	
1.5.1		Х	
1.6.1		Х	
2.1.1	X		
2.1.2	Х		
2.1.3		Х	
2.2.1	X		
2.2.2		Х	
2.2.3	Х		
2.2.4	Х		
2.2.5		Х	
2.2.6		Х	
2.2.7		Х	
2.2.8		Х	
2.2.9		Х	

In Protein	Initial Risk Rating		
Indicator	Specified	Low	Unspecified
2.3.1		Х	
2.3.2		Х	
2.3.3		Х	
2.4.1		Х	
2.4.2		Х	
2.4.3		Х	
2.5.1		Х	
2.5.2		Х	
2.6.1		Х	
2.7.1		Х	
2.7.2		Х	
2.7.3		Х	
2.7.4		Х	
2.7.5		Х	
2.8.1		Х	
2.9.1		Х	
2.9.2		Х	
2.10.1		Х	

8 Supplier Verification Programme

8.1 Description of the Supplier Verification Programme

Supplier verification program was not developed, because for Bimatra no unspeficied risks were identified in Risk Assessment (4.3).

8.2 Site visits

Not applicable.

8.3 Conclusions from the Supplier Verification Programme

Not applicable.

9 Mitigation Measures

9.1 Mitigation measures

For each specified risk, mitigation measures were identified in 2020 as follows.

1.3.1	The BP has implemented appropriate control systems and procedures to ensure that feedstock is legally harvested and supplied and is in compliance with EUTR legality requirements.
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Mitigation measure:

Bimatra has implemented appropriate control systems and procedures to ensure that the EUTR compliance is applied to all lots. Bimatra has a buying procedure in place, which includes collection of datas and informations about legal requirements.

See buying procedure of every lot, 'Aankoop procedure' and 'Feedstock checklist' spreadsheets.

	The Biomass Producer has implemented appropriate control systems and procedures for
2.1.1	verifying that forests and other areas with high conservation values are identified and
	mapped.

Mitigation measure:

Although this indicator is low risk for the protected areas it can still happen that HCV's are found outside these areas. Thus there is a system in place to respond to such requirement. In the contractors manual the BP states that forest & landowners are obliged to inform him if their lands are located in one of these sites and/or if any HCVs are present. Besides that these informations about each wood chipping are collected in BIMATRA form 'Feedstock checklist' and actions are taken subsequently consequently.

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.
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Mitigation measure:

In the contractors manual there is a small risk assessment presented. With this assessment potential risks while harvesting are identified as part of the company 'good practises'. These informations about each wood chipping are collected in BIMATRA form 'Feedstock checklist' and actions are taken subsequently consequently.

	The Biomass Producer has implemented appropriate control systems and procedures to
2.2.1	verify that feedstock is sourced from forests where there is appropriate assessment of
	impacts, and planning, implementation and monitoring to minimise them.

Mitigation measure:

Just for private forest in Wallonia and non-forest sites in the contractors manual there is a small risk assessment presented. With this assessment potential risks while harvesting should be identified as part of the company 'good practises'. These informations about each wood chipping are collected in BIMATRA form 'Feedstock checklist' and actions are taken subsequently consequently.

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).
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Mitigation measure:

Potential risks while harvesting are identified as part of the company 'good practises'. These informations about each wood chipping are collected in BIMATRA form 'Feedstock checklist' and actions are taken subsequently consequently.

2.2.4

Mitigation measure:

Potential risks while harvesting are identified as part of the company 'good practises'. These informations about each wood chipping are collected in BIMATRA form 'Feedstock checklist' and actions are taken subsequently consequently

9.2 Monitoring and outcomes

Bimatra has in place a monitoring procedure for every lot where SBP-compliant biomass potentially could come from. The monitoring procedure includes filling in a 'Buying procedure' on excel files, with many spreadsheets such as 'Feedstock checklist' spreadsheet, which contains information about:

- Traceability and Due Diligence evidence;
- Issues related to sustainability, protected areas and ecosystems, HCV;
- Health and Safety;
- Legal obligations;
- Certification claims;
- Control documents (example: port agency files).

If, after implementation of the monitoring procedure, the required information and/or documentation is not provided in due time, then feedstock is not sold as SBP-compliant, but as other material to different customers. If some legal requirement (not only documentation) is missing, the timber/wood is not bought at all.

Once a year the review of mitigation measures for specified risks is done and findings recorded in the Management Review.

10 Detailed Findings for Indicators

Detailed findings for each Indicator are given in Annex 1.

11 Review of Report

11.1 Peer review

No peer review was done prior to finalisation.

11.2 Public or additional reviews

Not applicable.

12 Approval of Report

Approval of Supply Base Report by senior management			
Report Prepared by:	Marco Bijl	Director FSG	06 nov. 2020
	Name	Title	Date
Report rivised by:	Dott. For. S. Ferutta Simona Ferutta Dott. For. S. Ferutta FERUTTA PERUTTA PROVINCIA DITO	Consultant	30 nov. 2020
The undersigned persons confirm that I/we are members of the organisation's senior management and do hereby affirm that the contents of this evaluation report were duly acknowledged by senior management as being accurate prior to approval and finalisation of the report.			
Report approved by:	Bart de Clerck	Director Bimatra	30 nov. 2020
	Name	Title	Date

13 Updates

Updated in 2020, as risk ratings were revised.

13.1 Significant changes in the Supply Base

None

13.2 Effectiveness of previous mitigation measures

No mitigation measure identified during the first evaluation.

13.3 New risk ratings and mitigation measures

Six new specified risks were identified in 2020 updating, with mitigation measures (see 9.1):

- 1.3.1 The BP has implemented appropriate control systems and procedures to ensure that feedstock is legally harvested and supplied and is in compliance with EUTR legality requirements.
- 2.1.1 The Biomass Producer has implemented appropriate control systems and procedures for verifying that forests and other areas with high conservation values are identified and mapped.
- 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.
- 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.
- 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).
- 2.2.4 The Biomass Producer has implemented appropriate control systems and procedures to ensure that biodiversity is protected (CPET S5b).

13.4 Actual figures for feedstock over the previous 12 months

Reporting period: the previous 12 month period (Dec 2019-Nov 2020).

Total volume of Feedstock: tonnes or m3 -	0-200.000 tons
Volume of primary feedstock : tonnes	0-200.000tonnes
List percentage of primary feedstock	Certified: 0% Not certified: 100%
Certified to an SBP-approved	
Forest Management Scheme	
Not certified to an SBP-approved	
Forest Management Scheme	

List all species in primary feedstock,	See table under 2.1
including scientific name	
Volume of primary feedstock from primary	0% (no primary forests remains in Belgium)
forest	
List percentage of primary feedstock from	NA
primary forest	
Volume of secondary feedstock:	NA
Volume of tertiary feedstock:	NA

The disclosure of the exact figure would reveal commercially sensitive information that could be used by competitors to gain competitive advantage, since they don't know at the moment ther exact amount of biomass and they could figure from that also the total timber handled every year and the share of the market.

13.5 Projected figures for feedstock over the next 12 months

These will be similar to last reporting period. Although Bimatra is intending to chip more material with their own machines (planting in progress).

* Compelling justification would be specific evidence that, for example, disclosure of the exact figure would reveal commercially sensitive information that could be used by competitors to gain competitive advantage. State the reasons why the information is commercially sensitive, for example, what competitors would be able to do or determine with knowledge of the information.

Bands are:

- 1. 0 200,000 tonnes or m^3
- 2. 200,000 400,000 tonnes or m³
- 3. 400,000 600,000 tonnes or m³
- 4.600,000 800,000 tonnes or m³
- 5. 800,000 1,000,000 tonnes or m³
- 6. >1,000,000 tonnes or m^3