



# Supply Base Report:

## Foronex BV. Scope Change Audit

**Sustainable Biomass Program**  
sbp-cert.org



## Completed in accordance with the Supply Base Report Template Version 2.2 and SBP Bridging Requirements for Meeting the Directive EU/2023/2413 (REDIII)

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

### Document history

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## 1 Overview

<b>Producer name:</b>	Foronex BV.
<b>Producer address:</b>	Ooigemstraat 16, 8710 Wielsbeke, Belgium
<b>SBP Certificate Code:</b>	SBP-06-83
<b>Geographic position:</b>	50.902226, 3.361631
<b>Primary contact:</b>	Andy Vandenberghe, +32 498 905 541, andy.vandenberghe@foronex.eu
<b>Company website:</b>	
<b>Date report finalised:</b>	10 Oct 2025
<b>SBR reporting period from:</b>	01 Apr 2024
<b>SBR reporting period to:</b>	31 Mar 2025
<b>Name of the Certification Body:</b>	Control Union Certifications BV
<b>Certification Body Approval date:</b>	16 Oct 2025
<b>SBP Standard(s) used:</b>	SBP Standard 1: Feedstock Compliance v2.0, SBP Standard 2: Feedstock Verification v2.0, SBP Standard 4: Chain of Custody v2.0, SBP Standard 5: Collection and Communication of Data v2.0, Instruction Document 1A: SBP Requirements for Primary Feedstock from Trees Outside Forests (TOF) v1.0, Instruction Document 5E: Collection and Communication of Energy and Carbon data. v2.1, Instruction Document EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413 v2.0
<b>Feedstock origin (countries)</b>	Belgium, France (European area), Germany, Netherlands (European area), Luxembourg
<b>Weblink to Standard(s) used:</b>	<a href="https://sbp-cert.org/documents/standards-documents/standards">https://sbp-cert.org/documents/standards-documents/standards</a>

## 2 Description of the Biomass Producer and the Supply Base

### 2.1 Description of the company

Founded in 1967 as a family business, Foronex BV specializes in the collection, delivery, processing, and trade of residual wood from forests, landscapes, the wood processing industry, and other biomass sectors.

It operates an office and storage facility in Wielsbeke (West Flanders) and supplies biomass to various ports in Belgium and France. Foronex is a major player in Belgium in the distribution of wood and agricultural residues but does not reach the turnover levels of the local paper mills.

Foronex BV owns two subsidiaries: Foronex Transport BV and Foronex France Transport SARL, operating around 40 trucks.

The company is PEFC, SBP, and SURE certified.

**Products included in the scope of SBP Certification:** WB 1.1 Wood pellets, WB 2.1 Wood chips, WB 2.2 Sawdust, WB 2.3 Wood shavings, WB 2.4 Other residues from wood processing

**Number of employees:** 13

**Annual maximum production capacity (metric tonnes):** 350000

**Number of direct feedstock suppliers:** 35

**Approximate number of feedstock sub-suppliers:** 0

### Description of the chain-of-custody and upstream supply chain:

Foronex collects low-grade residues from registered companies active in forestry, landscape management, urban operations, and the processing industry, and distributes them across several sectors, including the bioenergy sector. It builds long-term relationships with suppliers and customers to stabilize and improve production conditions in the region, following the cascading principle. At its main facility in Wielsbeke, Foronex routinely blends different types of biomass and has the capacity to crush wood industry offcuts.

### 2.2 Detailed description of the Supply Base

*Guidance: Tables below have been generated automatically for each sourcing country based on the selection of 'Feedstock origin (countries)' in section 1 above.*

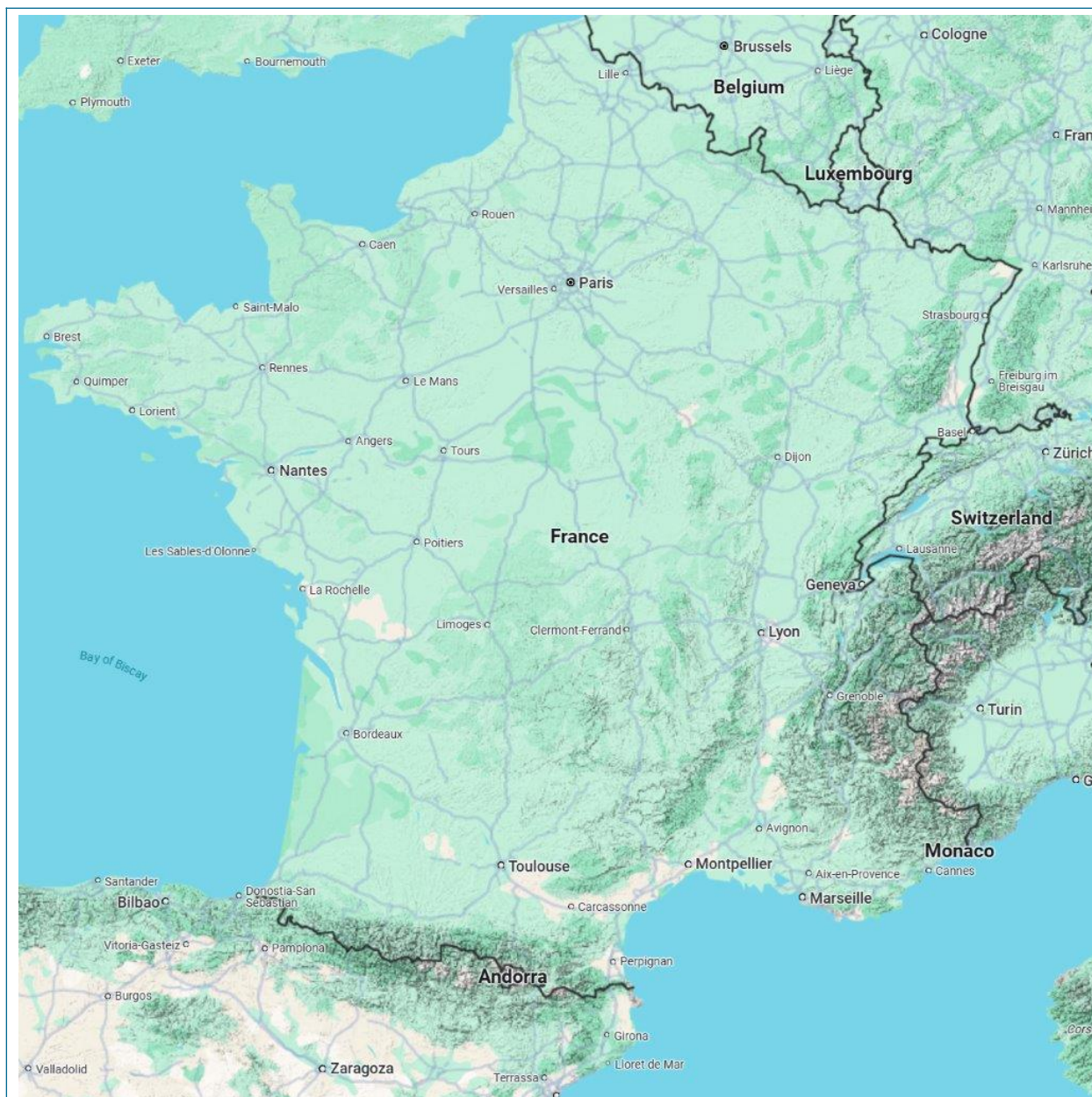
*Annex 1 is generated by the system if the SBP SBE is used without Regional Risk Assessment(s) (RRAs). In case RRA(s) is used, further details shall be given only in section 3 below.*

*Annex 2 is generated if EU RED SBE is in the scope for each country separately.*

<b>Country</b>	France
<b>Area/Region</b>	European areas
<b>Exclusions</b>	Non-European areas
<b>Feedstock types</b>	Primary, Processing residues
<b>Feedstock Product Groups</b>	Forest feedstock (1A), Trees outside forest (TOF) - Urban and landscape feedstock (2A), Processing residues feedstock (4A)
<b>Feedstock inputs</b>	SBP Compliant feedstock , SBP Controlled feedstock

<b>Is the forest managed to supply energy and non-energy markets?</b>	No
<b>For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?</b>	Yes - Majority
<b>Risk assessment(s)</b>	N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme
<b>Provide a concise summary of why a SBE was determined to be required or not required here:</b>	
An SBE for France has been prepared and will be activated in due time.	
<b>Feedstock types included in SBE:</b>	N/A
<b>Includes EU RED SBE:</b>	Yes
<b>Includes EU RED II SBE grandfathering</b>	No
<b>Includes EU RED TOF:</b>	Yes
<b>Includes EU RED II TOF grandfathering</b>	No
<b>Size of Supply Base area (million ha):</b>	55.1695
<b>Map(s) of the Supply Base area:</b>	

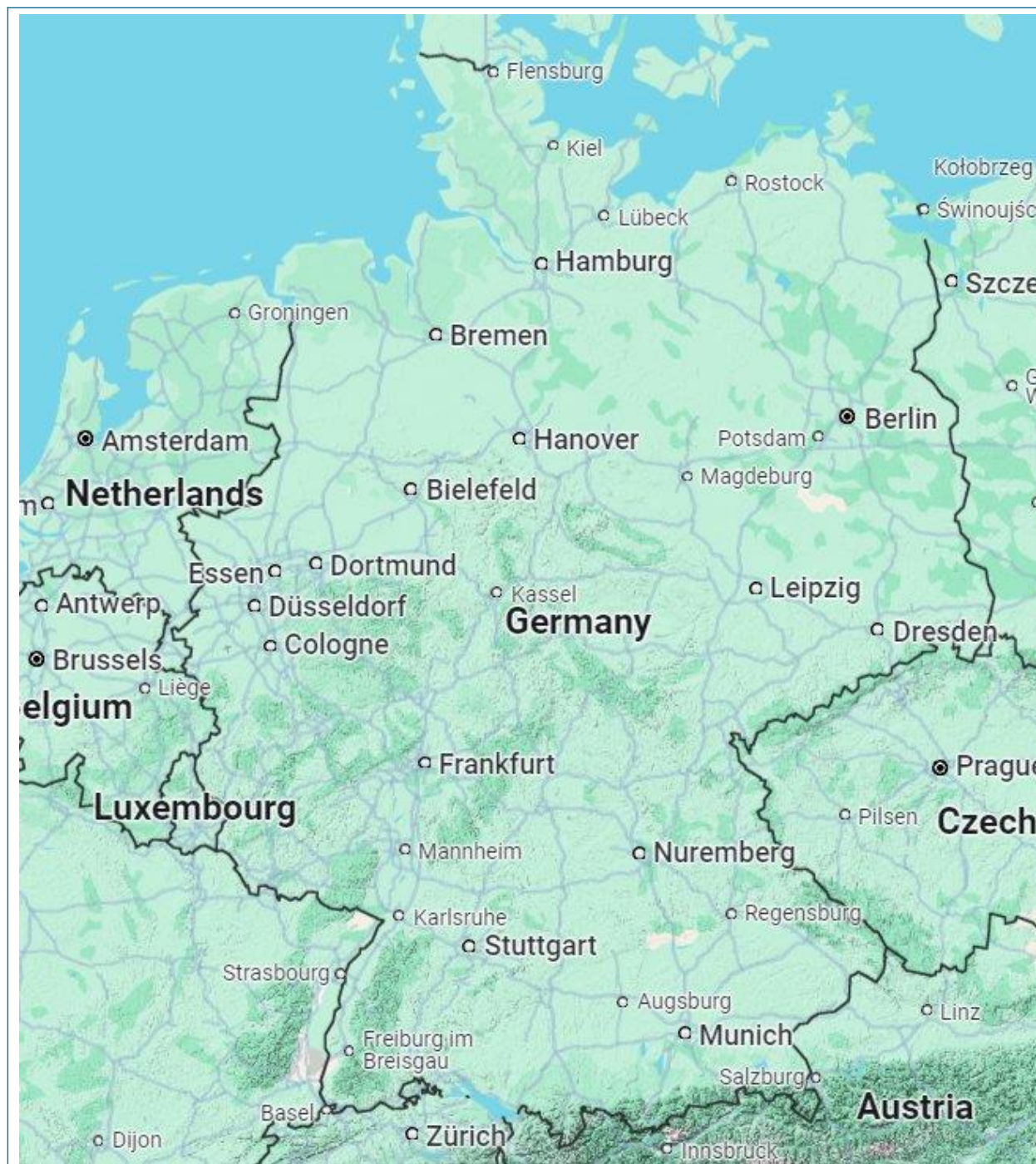




<b>Country</b>	Germany
<b>Area/Region</b>	
<b>Exclusions</b>	
<b>Feedstock types</b>	Primary, Processing residues
<b>Feedstock Product Groups</b>	Forest feedstock (1A), Trees outside forest (TOF) - Urban and landscape feedstock (2A), Processing residues feedstock (4A)
<b>Feedstock inputs</b>	SBP Compliant feedstock , SBP Controlled feedstock
<b>Is the forest managed to supply energy and non-energy</b>	No

<b>markets?</b>	
<b>For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?</b>	Yes - Majority
<b>Risk assessment(s)</b>	N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme
<b>Provide a concise summary of why a SBE was determined to be required or not required here:</b>	
Limited sourcing from Germany.	
<b>Feedstock types included in SBE:</b>	N/A
<b>Includes EU RED SBE:</b>	No
<b>Includes EU RED II SBE grandfathering</b>	No
<b>Includes EU RED TOF:</b>	Yes
<b>Includes EU RED II TOF grandfathering</b>	No
<b>Size of Supply Base area (million ha):</b>	35.7576
<b>Map(s) of the Supply Base area:</b>	





<b>Country</b>	Belgium
<b>Area/Region</b>	
<b>Exclusions</b>	
<b>Feedstock types</b>	Primary, Processing residues, Post-consumer

<b>Feedstock Product Groups</b>	Forest feedstock (1A), Trees outside forest (TOF) - Urban and landscape feedstock (2A), Processing residues feedstock (4A), Post-consumer feedstock (5A)
<b>Feedstock inputs</b>	SBP Compliant feedstock , SBP Controlled feedstock
<b>Is the forest managed to supply energy and non-energy markets?</b>	No
<b>For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?</b>	Yes - Majority
<b>Risk assessment(s)</b>	Yes – Biomass Producer's own risk assessment used (SBE)
<b>Provide a concise summary of why a SBE was determined to be required or not required here:</b>	
<p>The SBE is required to evaluate if primary volumes are SBP-compliant; FSC and PEFC forest management certification are not considered sufficient proof of sustainability under SBP. Foronex commissioned an independent consultancy agency to prepare the SBE, with the assignment to carry out an objective analysis. For the biomass market, it is important that the SBE is of high quality, based on recent literature references and conducted with an objective research approach, as hiding actual issues damages the sector in the long run. The SBE not only compiles substantiations for the risk ratings but also considers different published opinions and explains why certain opinions were, or were not, sufficient to affect the risk rating. Foronex is convinced that sourcing biomass can be done sustainably, but it requires consideration and effort.</p> <p>By investing in an objective SBE, Foronex aims to contribute to a transparent biomass market and help guard against the misrepresentation of sustainability risks. Commercial entities often tend to minimize existing risks. As has been observed in the past, the SBE produced by Foronex has been used by other SBP certificate holders (although without proper referencing).</p> <p><i>Note: The previous SBE developed by Foronex and BiomassConsult has been copied, partially or nearly in full, by other biomass producers. While this is not prohibited, proper referencing remains a certification requirement for any SBE. Using this work without clear reference constitutes a serious mistake (plagiarism). The SBE is not merely a compilation of information from publications; it also incorporates research into stakeholder input, unique deliberations on issues and risks, our own interpretations and conclusions, years of practical experience, and original mitigation measures.</i></p>	
<b>Feedstock types included in SBE:</b>	Primary
<b>Includes EU RED SBE:</b>	Yes
<b>Includes EU RED II SBE grandfathering</b>	No
<b>Includes EU RED TOF:</b>	Yes
<b>Includes EU RED II TOF grandfathering</b>	No
<b>Size of Supply Base area (million ha):</b>	3.0528
<b>Map(s) of the Supply Base area:</b>	

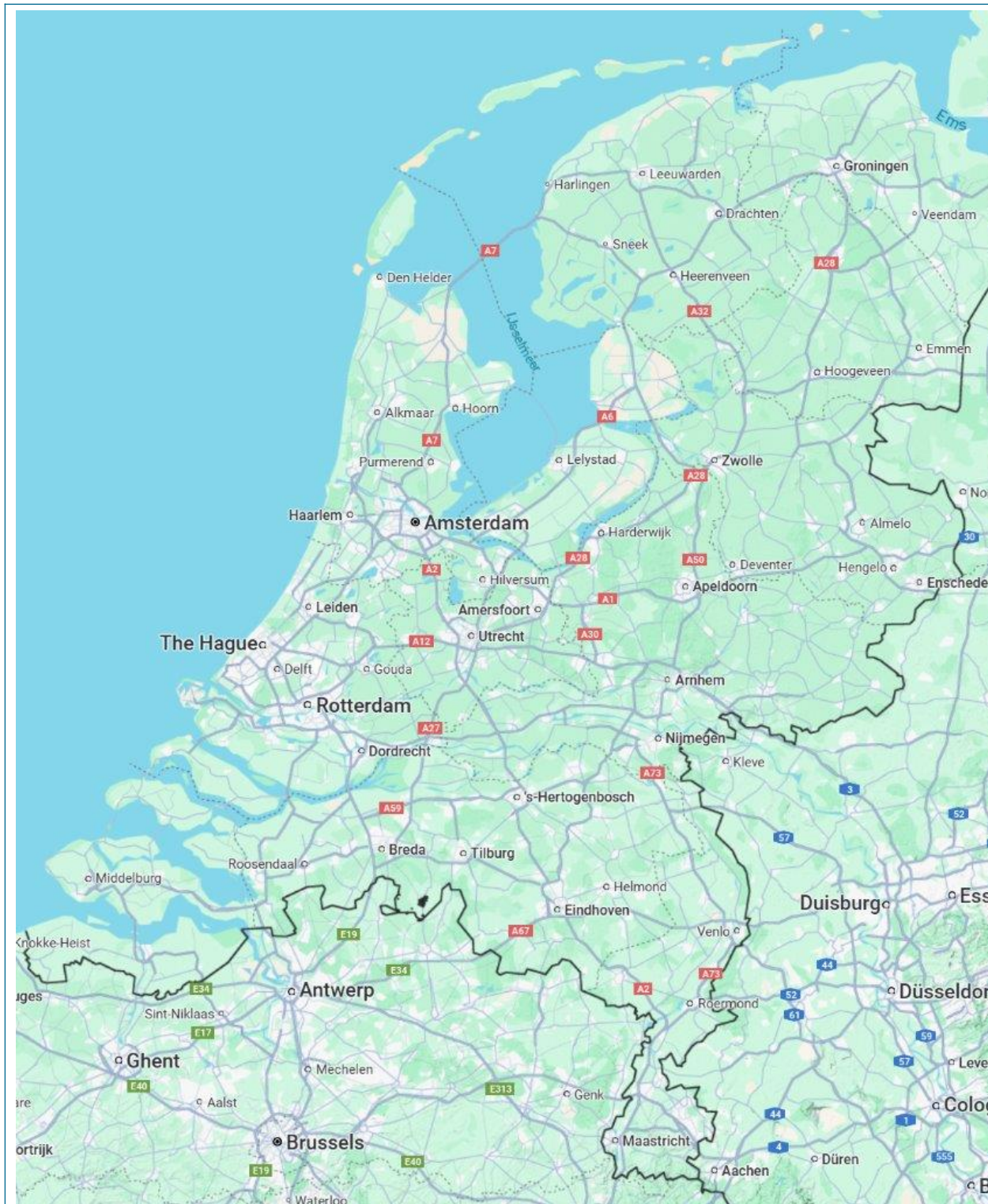




<b>Country</b>	Netherlands
<b>Area/Region</b>	European area
<b>Exclusions</b>	
<b>Feedstock types</b>	Primary, Processing residues
<b>Feedstock Product Groups</b>	Forest feedstock (1A), Trees outside forest (TOF) - Urban and landscape feedstock (2A), Processing residues feedstock (4A)
<b>Feedstock inputs</b>	SBP Compliant feedstock , SBP Controlled feedstock
<b>Is the forest managed to supply energy and non-energy markets?</b>	No
<b>For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?</b>	Yes - Majority
<b>Risk assessment(s)</b>	N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme

<b>Provide a concise summary of why a SBE was determined to be required or not required here:</b>	
Limited sourcing from the Netherlands.	
<b>Feedstock types included in SBE:</b>	N/A
<b>Includes EU RED SBE:</b>	No
<b>Includes EU RED II SBE grandfathering</b>	No
<b>Includes EU RED TOF:</b>	Yes
<b>Includes EU RED II TOF grandfathering</b>	No
<b>Size of Supply Base area (million ha):</b>	4.1543
<b>Map(s) of the Supply Base area:</b>	

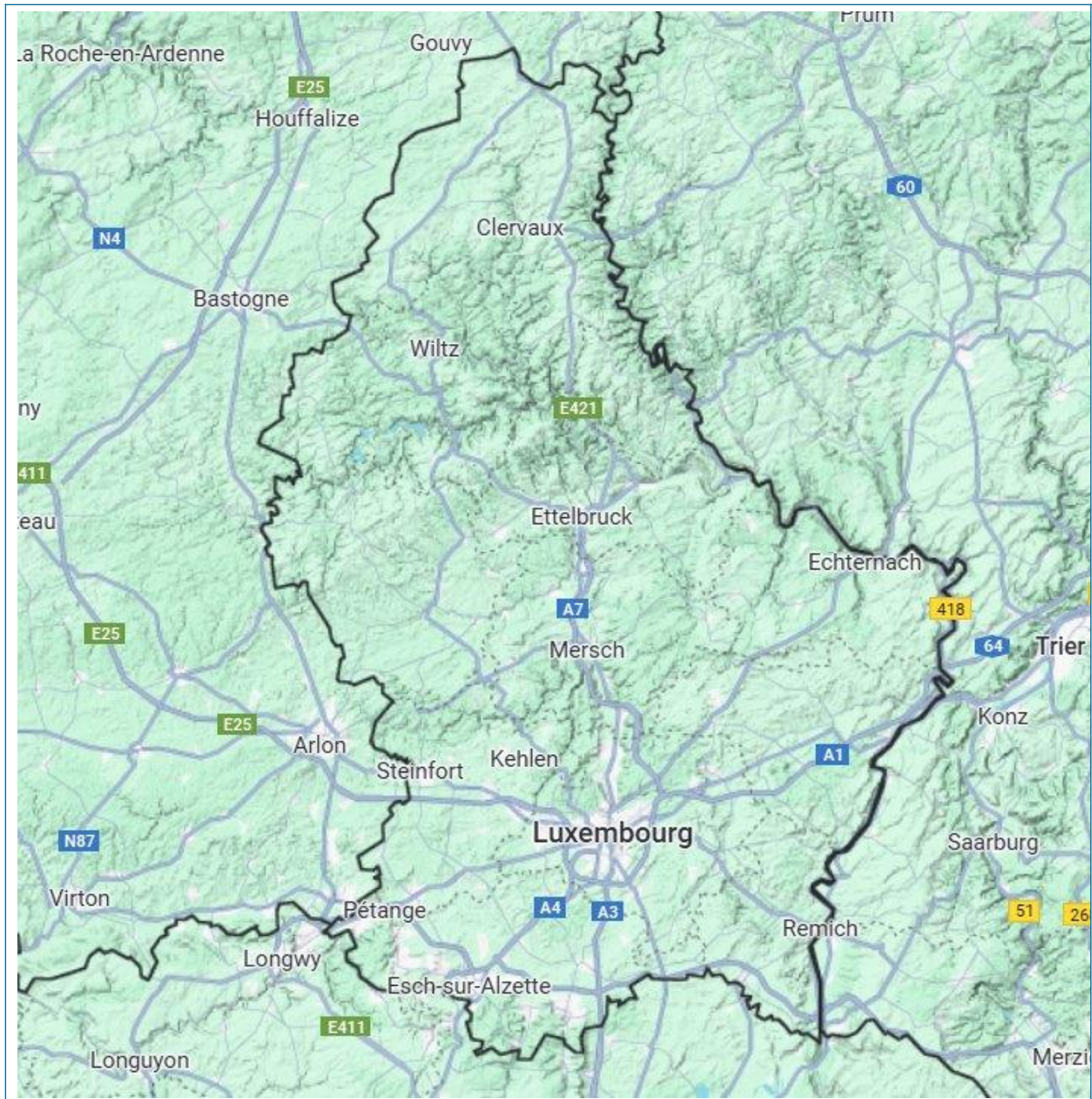




Country	Luxembourg
Area/Region	

<b>Exclusions</b>	
<b>Feedstock types</b>	Primary, Processing residues
<b>Feedstock Product Groups</b>	Forest feedstock (1A), Trees outside forest (TOF) - Urban and landscape feedstock (2A), Processing residues feedstock (4A)
<b>Feedstock inputs</b>	SBP Compliant feedstock , SBP Controlled feedstock
<b>Is the forest managed to supply energy and non-energy markets?</b>	No
<b>For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?</b>	Yes - Majority
<b>Risk assessment(s)</b>	N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme
<b>Provide a concise summary of why a SBE was determined to be required or not required here:</b>	
Limited sourcing from Luxembourg.	
<b>Feedstock types included in SBE:</b>	N/A
<b>Includes EU RED SBE:</b>	No
<b>Includes EU RED II SBE grandfathering</b>	No
<b>Includes EU RED TOF:</b>	Yes
<b>Includes EU RED II TOF grandfathering</b>	No
<b>Size of Supply Base area (million ha):</b>	0.2586
<b>Map(s) of the Supply Base area:</b>	





## 2.3 Feedstock information

- a. Total volume of Feedstock:** 1-200,000 tonnes
- b. Volume of primary feedstock:** 1-200,000 tonnes
- c. List of all the species in primary feedstock, including scientific name:**

Alnus spp	Maple
Alnus glutinosa	Alder
Betula spp	Birch
Carpinus betulus	Hornbeam
Castanea sativa	Chestnut
Fagus sylvatica	Beech
Fraxinus excelsior	Ash
Populus spp	Poplar
Prunus avium	Cherry
Prunus serotina	Black cherry
Quercus spp	Oak
Robinia pseudoacacia	Black locust
Salix alba	Willow
Sorbus aucuparia	Rowan
Tilia cordata	Lime
Ulmus minor	Elm
Picea abies	Spruce
Abies spp	Silver fir
Pinus sylvestris	Scots pine
Pseudotsuga menziesii	Douglas fir
Aesculus hippocastanum	Horse chestnut

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

**Explanation:** It can occur that a plot is harvested, because of a pest/disease, or because measures are taken to reduce the risks. The amount effected by such disturbances varies per region and year. In some regions in Germany, the proportion of affected forests has been high.

- e. Hardwood (i.e. broadleaf trees): specify proportion of feedstock from (%):** 70.00
- f. Softwood (i.e. coniferous trees): specify proportion of feedstock from (%):** 30.00

- g. Proportion of feedstock composed of or derived from saw logs by weight (%):** 0.00
- h. Indicate how you determine the proportion of saw log:** Specification used by the sawmill closest to where the wood was grown.
- i. Roundwood from fellings from forests with > 40 yr rotation times - Average % volume of fellings delivered to BP (%):** 20.00
- j. Select forest type(s) where the primary feedstock was sourced from:** Mix of The Above
- k. Select the main harvesting system(s) used for the sourced primary feedstock:** Mix of the above
- l. Volume of primary feedstock from primary forest:** 0
- m. Volume of processing residues feedstock:** 1-200,000 tonnes  
**Physical form of the feedstock:** Chips, Sawdust, Offcuts
- n. Share of SBP-recognised system claim for processing residues:**

100 % PEFC

- o. Volume of post-consumer feedstock:** 0  
**Physical form of the feedstock:** Chips, Sawdust, Offcuts
- p. Estimated amount of EU RED-compliant sustainable feedstock that could be collected annually by the BP:** 80000 tonnes
- q. What is the estimated amount of EU RED-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated):** 22000000.00 m3  
**Explanation:** FAOstat indicates that France and Belgium produced over 25 million m3 of wood fuel in 2023. However, not all these volumes will be EU RED compliant.

### 3 Supply Base Risk Assessments and Risk Management Measures

*Guidance: Biomass Producers shall demonstrate that any specified risks of sourcing feedstock not in compliance with SBP Standard 1 have been adequately reduced to low risk, following Standard 2 requirements. Following section applies to Biomass Producer's implementing SBP Supply Base Evaluation (SBP RRA or company own risk assessment). EU RED Supply Base Evaluation details are reported in Annex 2.*

☐ **Not Applicable – Supply Base Evaluation not implemented**

#### 3.1 Summary of the Supply Base Evaluation

In general, forests in Belgium are managed excellently. However, based on a thorough assessment against the criteria of SBP Standard 1, the SBE concluded that the sustainable management of High Conservation Value Forests — both within and outside protected areas — must be explicitly safeguarded. This aligns closely with the new REDIII requirements concerning 'no-go' areas and is supported by the current unfavourable conservation status of ten forest types listed in Annex I of the EU Habitats Directive. Additionally, as biodiversity values and habitats can establish themselves within a relatively short period, pre-harvest impact assessments of operations remain crucial.

As a result, two indicators were categorised as specified risk for sourcing in both forests and landscapes, and three additional indicators only for sourcing in forests. Regardless, our general risk mitigation procedure applies to all sourcing areas and situations, with regular field inspections carried out. Some indicators may be considered low risk because our company has not encountered issues with them in many years, but our team stays alert for any signs of incorrect or careless management.

Implementing the risk mitigation procedures requires considerable time but is straightforward. Wood procurement specialists at our company have demonstrated competence in recognising forest habitat types, biodiversity values, and best practices in sourcing operations. While the SBE has proven to limit output, it has also delivered valuable results in ensuring legality and sustainability. Engagement with harvesting teams, authorities, and specialists has become an integral part of Foronex's daily work.

#### 3.2 Conflicts with applicable national and sub-national legislation

No explicit conflicts between the SBP requirements and existing legislation or regulations were identified in any of Belgium's three regions. However, the SBP and REDIII requirements are in some cases more demanding than the minimum levels set by the regional frameworks governing the forestry sector.

#### 3.3 Risk Management Measures

*Guidance: Please provide more details about specified risk indicators in each supply country and describe mitigation measures taken to address all specified risks associated with indicators.*

<b>Country:</b> Belgium	
<b>Area/sub-scope:</b>	
<b>Risk Assessment used:</b>	
	<input type="checkbox"/> SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim



	<input type="checkbox"/> SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim <input type="checkbox"/> SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim <input type="checkbox"/> SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed <input type="checkbox"/> SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim <input type="checkbox"/> SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed <input type="checkbox"/> SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed <input type="checkbox"/> SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed <input type="checkbox"/> SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim <input type="checkbox"/> SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim <input type="checkbox"/> SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim <input type="checkbox"/> SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim <input type="checkbox"/> SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim <input checked="" type="checkbox"/> Biomass Producer's own risk assessment
<b>Indicator with specified risk:</b>	
2.1.2 Threats to and impacts on the identified key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified and evaluated.	
<b>Description of the specific risk:</b>	
<p>This indicator applies to Forests and Trees Outside Forests (TOF) - Landscape (not to TOF - Urban). Specified risk on HCV 3. Low risk on the other HCVs.</p> <p>In general, HCV 3 is managed adequately in Belgium through a comprehensive legal framework, species protection measures, and designated areas such as Natura 2000 sites. However, a specified risk has been identified for 10 habitat types listed in Annex I of the EU Habitats Directive. These habitats are currently indicated with the worst conservation status. The risk is considered present across all territories, including landscapes, private and public forests, national parks, protected areas, and Natura 2000 sites.</p>	
<b>Mitigation measure:</b>	
<p>To mitigate the identified risk related to endangered Annex I forest habitats (HCV3), our company applies a precautionary approach.</p> <p>The general procedure for assessing harvesting areas is defined as a mitigation measure under indicator 2.1.3. For each sourcing area, documentation on management operations is collected. Using this, along with online maps and databases, some areas can be excluded early if they clearly lack ecosystem elements typical of the ten valuable habitat types. If such elements are identified or possibly present, the location, relevant forest management plans, and harvesting permits are re-examined with regard to the environmental impact assessment and conservation measures targeting the habitat type or its components. The minimal required effort of habitat conservation (active or passive) depends on the classification of the area as protected or regular.</p> <p>In protected areas, such as Natura 2000 sites, the management operations and plans must demonstrably contribute to the improvement of the endangered habitat type.</p> <p>In non-protected areas, the presence of valuable forest elements must at least be preserved (to the present level). These may not be further endangered or replaced through the harvesting operations.</p> <p>If typical elements of one of the high-value habitat types are present, biomass may only be sourced from maintenance operations (not clear cuts) that contribute to the conservation of those features. Areas with approved forest management plans or harvesting permits may be accepted only if the environmental impact has sufficiently been assessed and effective conservation practices are demonstrated. Additional verification may include examination of the regional context, plot-level review, and confirmation that best practices are applied in forest residue removal.</p> <p>FSC certification is considered sufficient to demonstrate compliance. According to the SBP benchmark,</p>	

PEFC certification may not guarantee adequate environmental impact assessment; therefore, PEFC-certified areas require further review.

In case of insufficient evidence or doubt, the area is excluded from the SBE.

#### Monitoring and outcomes:

Foronex conducted in-depth monitoring of forest planning and operations in and outside protected areas—such as Natura 2000 sites—that contain or may contain high-conservation-value forest habitats. While many cases showed good implementation, recurring gaps in documentation and inconsistencies with conservation objectives were observed. Sourcing areas are always visually inspected when one of the ten identified forest habitat types, or elements thereof, is present or might be present.

While most protected areas and zones are managed effectively and sustainably, Foronex regularly needed to ask authorities and forest owners for additional clarifications, where management plans or operational permits lacked a clear contribution to the conservation of the ten forest habitat types.

In Flanders, most activities in Natura 2000 areas were implemented as planned, and visual inspections confirmed positive outcomes. However, several felling permits lacked habitat-specific detail, using general terms like "native broadleaves," and in some cases included species not suited to the targeted Natura 2000 habitat types. Forest management plans varied in quality, and some did not convincingly address Natura 2000 objectives. Geopunt often maps valuable habitat types in private forests, apparently based on the site's ecological potential rather than the existing vegetation.

In Wallonia, documentation was generally more limited. Some cases referred only to broad conservation goals and lacked spatial detail. In certain instances, approved management plans could not be retrieved despite repeated efforts, making full verification impossible.

Additional research was carried out in all unclear cases. Despite legal compliance, several sites did not pass the SBE due to unresolved concerns regarding habitat conservation practices or inadequate documentation.

**Country:** Belgium

**Area/sub-scope:**

**Risk Assessment used:**

- ☐ SBP-RRA-AS-VN-FOR\_v1.0 RRA for Vietnam FOR\_Interim
- ☐ SBP-RRA-US-NF-FOR\_v1.0 RRA for US National FOR\_Interim
- ☐ SBP-RRA-US-PF-FOR\_v1.0 RRA for US Private FOR\_Interim
- ☐ SBP-RRA-EU-DK-FOR\_v2.0 RRA for Denmark FOR\_Endorsed
- ☐ SBP-RRA-EU-DK-TOF\_v1.0 RRA for Denmark TOF\_Interim
- ☐ SBP-RRA-EU-EE-FOR\_v2.0 RRA for Estonia FOR\_Endorsed
- ☐ SBP-RRA-EU-LV-FOR\_v2.0 RRA for Latvia FOR\_Endorsed
- ☐ SBP-RRA-EU-LT-FOR\_v2.0 RRA for Lithuania FOR\_Endorsed
- ☐ SBP-RRA-CA-QC-FOR\_v2.0 RRA for Quebec FOR\_Interim
- ☐ SBP-RRA-CA-AB-FOR\_v1.0 RRA for Alberta FOR\_Interim
- ☐ SBP-RRA-CA-BC-FOR\_v2.0 RRA for British Columbia FOR\_Interim
- ☐ SBP-RRA-CA-NB-FOR\_v1.0 RRA for New Brunswick FOR\_Interim
- ☐ SBP-RRA-CA-NS-FOR\_v1.0 RRA for Nova Scotia FOR\_Interim
- ☒ Biomass Producer's own risk assessment

**Indicator with specified risk:**



2.1.3 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.

**Description of the specific risk:**

This indicator applies to Forests and Trees Outside Forests (TOF) - Landscape (not to TOF - Urban) Habitats and species with high biodiversity and conservation value may emerge over short timeframes. To ensure these values are not overlooked, every plot must be assessed before operations begin. Our company applies a precautionary approach: the risk of impacting conservation values is considered present across all territories, including landscapes, private and public forests, national parks, and protected areas such as Natura 2000 sites.

**Mitigation measure:**

Biomass only passes the SBE if it originates from operations that demonstrably avoid harm to important environmental values. Harvesting teams must notify our Certification Manager in advance, allowing time for proper plot assessment.

Assessment Step Plan (Certification Manager):

1. Document request and review

Forest management plans and harvesting permits are requested and checked for accuracy and completeness. If information is unclear or missing, or if inconsistencies arise, the supplier is contacted again. In case of doubt our company also contacts the relevant authority directly.

2. Desk research

The plot is reviewed using online maps, satellite imagery, and official databases. The Certification Manager checks the area's legal and ecological status, including possible designations such as Natura 2000, national park, known sensitive habitat types, or the potential presence of protected species.

3. Assessment

Before any site visit, the Certification Manager evaluates context-specific risk factors, including the timing of operations (like nesting periods), and the type, ecological condition, and size of the surrounding forest (for example a large mature spruce monoculture vs. a small and vulnerable beech forest), and other local sensitivities. The forest habitat type is determined as precisely as possible based on available data. On basis of the findings, the supplier is interviewed to assess their awareness of any identified environmental values and applicable biodiversity obligations.

4. Onsite inspection

Nearly always, a field inspection is carried out before or during the operations. This allows for direct verification of environmental values, forest type, and operational practices. Our company expects from our suppliers that best practices are applied onsite. A site is only not visited if the likelihood of biodiversity values is minimal and there is sufficient prior experience with the supplier's compliance and quality of work.

Verification and Decision

The Certification Manager discusses the findings with the supplier to confirm alignment between planned operations and biodiversity obligations.

Harvesting plots are accepted only if environmental values are assessed and conservation measures are clearly respected. In case of any doubt the plots are excluded from the SBE.

FSC-certified areas are accepted as compliant. PEFC-certified areas are subject to additional review, as PEFC does not always guarantee sufficient environmental assessment under the SBP benchmark.

In case of doubt or insufficient evidence, the area is excluded.

All assessments are documented systematically per supplier and per plot. This includes the completed assessment checklist, relevant documents, photos, etc.

This procedure serves as the framework for implementing the mitigation measures under indicators 2.1.2, 2.2.2, 2.2.3, 3.2.2, and 3.2.3. While the specific aspects assessed under each indicator differ, the method

and steps of the assessment are the same.

As a result of strict inspections and increased requirements under SBP version 2 and REDIII, more suppliers will fall short of compliance, meaning our company will do more work while achieving less output.

#### Monitoring and outcomes:

See monitoring outcomes under the previous specified risk indicator on high-conservation-value forest habitats.

In addition to habitat-specific assessments, Foronex monitored broader biodiversity and ecosystem impacts across sourcing areas in Flanders, Wallonia, and the Brussels Region.

While many operations complied with planning requirements and legal obligations, weaknesses remain in the integration of biodiversity considerations into forest management. These include vague replanting prescriptions, inconsistent ecological guidance, and limited documentation—particularly outside Natura 2000 areas.

Regarding Flanders, Geopunt regularly provides information on potential biodiversity values rather than actual conditions, making monitoring more demanding.

In Wallonia and Brussels, spatial data gaps and fragmented responsibilities further complicated the assessment of biodiversity outcomes, especially for smaller landscape elements such as hedgerows and isolated trees. In some instances, uncertainties regarding ecological impact or compensation required additional investigation. In isolated instances, signs of forest degradation were observed, including regeneration with monocultures of low value species. Some forestry consultancies continue to promote the cultivation of poplar plantations (in Wallonia). However, most in Belgium agree: that's something from the past.

Foronex conducted follow-up research and field inspections in all unclear cases. Regularly sourcing areas did not pass the SBE due to unresolved concerns about biodiversity impacts or insufficient ecological justification.

#### Monitoring of Harvesting Companies

All harvesting is carried out by officially licensed suppliers. Foronex has worked with the same harvesting teams for many years. These companies have consistently delivered adequate results. When a new harvesting company is introduced, Foronex conducts a site visit before any cooperation begins: machinery is reviewed, working methods are observed, and clear agreements are made on best practices, for example, on using lighter equipment in sensitive areas to minimise environmental impact. The mitigation procedure requires on-site verification when research indicates the presence or potential presence of HCVs, elements of valuable forest habitat types, or other ecological, or biodiversity conservation values. Every on-site inspection includes an evaluation of the quality of the executed work. Random site inspections are also conducted to check the performance of the harvesting teams. These may occur even in routine sourcing areas, including for example roadside pruning operations.

**Country:** Belgium

**Area/sub-scope:**

**Risk Assessment used:**

- ☐ SBP-RRR-AS-VN-FOR\_v1.0 RRA for Vietnam FOR\_Interim
- ☐ SBP-RRR-US-NF-FOR\_v1.0 RRA for US National FOR\_Interim
- ☐ SBP-RRR-US-PF-FOR\_v1.0 RRA for US Private FOR\_Interim

	<input type="checkbox"/> SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed <input type="checkbox"/> SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim <input type="checkbox"/> SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed <input type="checkbox"/> SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed <input type="checkbox"/> SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed <input type="checkbox"/> SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim <input type="checkbox"/> SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim <input type="checkbox"/> SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim <input type="checkbox"/> SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim <input type="checkbox"/> SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim <input checked="" type="checkbox"/> Biomass Producer's own risk assessment
<b>Indicator with specified risk:</b>	
3.2.2 Primary feedstock shall not be sourced from forest areas where site productivity is low and, according to local definitions or norms, the areas are classified as low-productive or difficult to regenerate.	
<b>Description of the specific risk:</b>	
<p>This indicator applies to Forests only, not to Trees Outside Forests (TOF).</p> <p>The indicator states unambiguously that biomass shall not be sourced from low-productive or difficult-to-regenerate areas. The possibility of making a conditional exception is not explicitly mentioned in the SBP guidance, though likely implied. In Belgium, such forests exist — mainly within protected areas and zones — and biomass sourcing does occur, creating a risk of non-compliance, partly due to the indicator's strict wording.</p>	
<b>Mitigation measure:</b>	
<p>Foronex verifies the management plans and operational practices both within and outside the protected areas and zones.</p> <p>Our general risk mitigation procedure (see indicator 2.1.3) includes the assessment of sourcing areas for biodiversity, environmental values, and sustainable regeneration using supplier documentation, online maps and databases, and field inspections.</p> <p>The integration of the REDIII requirements into this procedure clarifies and specifies several conservation topics that were already being addressed. BiomassConsult's "REDIII Compliance Approach" is applied to close the remaining gaps. It covers the requirements of REDIII paragraphs 29(3–5) on no-go areas and paragraph 29(6) on the mandatory verification of biomass sourcing operations.</p> <p>The sourcing area can pass the SBE if forest management (plan) is sustainable, sourcing operations do not harm ecological values, do not cause significant carbon emissions from harvesting in combination with slow or prolonged regeneration, and do not result in forest degradation. However, if the area may at the same time be considered an old-growth forest, it is excluded unconditionally.</p>	
<b>Monitoring and outcomes:</b>	
<p>See indicators 2.1.2 and 2.1.3 for monitoring outcomes.</p> <p>Monitoring focuses on the correct categorisation of all sourcing areas, the (planned) objectives of operations, and the quality of the executed work. Importantly, areas with high ecological value are actively identified not only in protected zones, but also in non-designated areas. If issues are found, they are communicated to all stakeholders involved.</p> <p>Operations in protected areas and zones are typically aimed at conserving the valuable and vulnerable ecosystems present and are mostly carried out correctly, aligning with REDIII requirements.</p>	

<b>Country:</b> Belgium	
<b>Area/sub-scope:</b>	
<b>Risk Assessment used:</b>	
	<input type="checkbox"/> SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim <input type="checkbox"/> SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim <input type="checkbox"/> SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim <input type="checkbox"/> SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed <input type="checkbox"/> SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim <input type="checkbox"/> SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed <input type="checkbox"/> SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed <input type="checkbox"/> SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed <input type="checkbox"/> SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim <input type="checkbox"/> SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim <input type="checkbox"/> SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim <input type="checkbox"/> SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim <input type="checkbox"/> SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim <input checked="" type="checkbox"/> Biomass Producer's own risk assessment
<b>Indicator with specified risk:</b>	
3.2.3 feedstock shall not be sourced from forest areas in the Supply Base which, according to local definitions or norms, are classified as having combined attributes of high carbon stocks and high conservation value (HCV).	
<b>Description of the specific risk:</b>	
<p>This indicator applies to Forests only, not to Trees Outside Forests (TOF).</p> <p>The indicator states unambiguously that biomass shall not be sourced from forests having combined attributes of high carbon stocks and high conservation value (HCV).</p> <p>The possibility of making a conditional exception is not explicitly mentioned in the SBP guidance, though likely implied. In Belgium, such forests exist — mainly within protected areas and zones — and biomass sourcing does occur, creating a risk of non-compliance, partly due to the indicator's strict wording.</p>	
<b>Mitigation measure:</b>	
<p>See the mitigation measures of the previous indicator 3.2.2.</p> <p>The topic of high carbon stocks and HCV is well covered by REDIII paragraphs 29(3–5), while paragraph 29(6) requires onsite verification of best practices. The integration of the REDIII requirements from the mentioned paragraphs into our general mitigation procedure for Belgium (see indicator 2.1.3) serves as a specification of the assessment method. The assessment method already paid special attention to 10 high-value forest habitat types in Belgium (see indicator 2.1.2).</p> <p>The sourcing area can pass the SBE if forest management (plan) is sustainable, sourcing operations do not harm ecological values, do not cause significant carbon emissions from harvesting in combination with slow or prolonged regeneration periods, and do not result in the loss of conservation values. However, if the area may at the same time be considered an old-growth forest, it is excluded unconditionally.</p>	
<b>Monitoring and outcomes:</b>	
<p>See indicators 2.1.2 and 2.1.3 for monitoring outcomes.</p> <p>Monitoring focuses on the correct categorisation of all sourcing areas. Forests with ecological or conservation value are actively sought—not only in protected zones, but also in non-designated areas. The (planned) objectives of operations and the quality of the executed work are assessed in each case. If any issues are identified, they are communicated to all relevant stakeholders.</p>	

The operations in protected areas and zones are typically aimed at conserving the valuable and vulnerable ecosystems present and are mostly carried out correctly, in line with REDIII requirements. In the context of this indicator (on high carbon stocks and High Conservation Value Forests), the unconditional exclusion of old-growth forests under REDIII, even in cases where management operations would support their preservation, is relevant.

<b>Country:</b> Belgium	
<b>Area/sub-scope:</b>	
<b>Risk Assessment used:</b>	
	<input type="checkbox"/> SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim <input type="checkbox"/> SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim <input type="checkbox"/> SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim <input type="checkbox"/> SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed <input type="checkbox"/> SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim <input type="checkbox"/> SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed <input type="checkbox"/> SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed <input type="checkbox"/> SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed <input type="checkbox"/> SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim <input type="checkbox"/> SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim <input type="checkbox"/> SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim <input type="checkbox"/> SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim <input type="checkbox"/> SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim <input checked="" type="checkbox"/> Biomass Producer's own risk assessment
<b>Indicator with specified risk:</b>	
3.3.1 Feedstock sourcing shall be in compliance with the principles of cascading use, high quality stem wood shall not be used as feedstock if it is in substantial demand for long-lived products in the Supply Base.	
<b>Description of the specific risk:</b>	
<p>This indicator applies to Forests only, not to Trees Outside Forests (TOF).</p> <p>On the cascade principle and the use of biomass for renewable energy, the Belgian governments have taken an active stakeholder engagement approach, including the possibility of enforcement measures. However, the current governing framework remains insufficient to ensure that renewable energy support schemes will not undermine the efficient use of primary feedstock. Given Belgium's highly developed wood processing industry, there is a risk that policy incentives, such as subsidies and green certificates, both from the regions themselves and from other European countries, create competition with the wood and paper industry.</p>	
<b>Mitigation measure:</b>	
Priority is given to our non-energy customers, provided that deliveries remain economically feasible, even when such deliveries are less profitable as to the energy sector.	
<b>Monitoring and outcomes:</b>	
Foronex has long supplied primary, secondary, and tertiary wood residues and wastes to a broad range of industries, maintaining active engagement with customers to support long-term, stable business	

relationships. Based on this strategy and its long-term objectives, the company is well positioned to assess the suitability of raw material for different customers and to apply the cascading principle in practice. This approach is key in our mitigation measure on the cascading principle.



## 4 Stakeholder engagement

### 4.1 General description

**Biomass Producer's stakeholder engagement start date:** 01 Nov 2022

**Biomass Producer's stakeholder engagement end date:** 23 Apr 2025

**Total number of stakeholders contacted:** 50

**Give a general description of the process of Stakeholders Engagement, including stakeholders contacted, method of communication and a summary of the comments received:**

#### Stakeholder engagement

Our company has engaged a wide range of stakeholders since its founding and continues to do so daily. Our Stakeholder Engagement Plan and Comments, Complaints, and Feedback Procedure are available upon request. To date, no comments have been received, directly or indirectly, in relation to our SBP certification.

#### Supply Base Evaluation Belgium

In 2022, the SBE development project was led by Rens Hartkamp, director of BiomassConsult and Andy Vandenberghe, Certification Manager at FORONEX BV.

Mr. Hartkamp (M.Sc. Forestry; Ph.D. Economics) has 25 years of experience in forest certification and 15 years in biomass certification. He has played a key role in benchmarking and developing criteria and indicators for biomass certification schemes. As the first consultant involved with SBP, he has supported over 200 companies in achieving certification. He passed the SBP auditor exams in 2015. He launched the first SBE for Portugal, which has since been widely adopted. In January 2024, BiomassConsult's REDII Level A report for Wallonia was approved.

Mr. Vandenberghe has a background in accountancy and nearly 40 years of experience in the forest and wood sector. Mr. Vandenberghe is skilled in identifying forest habitats, tree species, and, for example, wood from different tree species. He is responsible for managing the PEFC and SBP certification systems at FORONEX BV. The Supply Base Evaluation process consisted of a literature study and consultations with experienced specialists. Considered were relevant policies, public authorities, laws and regulations, enforcement, as well as official databases, critical reports of non-governmental organizations, mass media publications, etc.

During the development process, several specialists were consulted for their views. Subsequently, our company distributed the SBE to 36 stakeholders and individuals with practical experience in the Belgian biomass sector, representing economic, social, and ecological interests. The stakeholders were contacted by email in Dutch, French, and/or English at the beginning of November 2022. Additionally, the SBE was publicly available online for two months prior to the SBP audit. The Public Service of Wallonia submitted a list of corrections and improvements, all of which were incorporated.

The developed mitigation measures were tested in practice, after which the procedures and template assessment documents were further improved and audited. In 2023, the procedures entered into force, and many evaluations have since been carried out. Experience gained is integrated into the procedures at least once a year. During the years of SBE implementation, the views of many specialists have been considered. Most confirmed the correctness of the approach, and only minor adjustments have been made since. In 2025, the SBE was updated to reflect new legislation and a renewed review of critical publications.

#### EU RED Level B - France (metropolitan), Flanders and Wallonia

Foronex BV uses the EU RED Level B reports for France, Flanders, and Wallonia developed by BiomassConsult, which also conducted stakeholder consultation over several months in the summer of 2025.

During development, the assessments were discussed with numerous stakeholders and subsequently sent to an additional 46 stakeholders by email, including research organisations and NGOs (9), biomass consultants (5), biomass suppliers (21), end-users (9), and regional authorities (2). The results were publicly available on BiomassConsult's website for several months. This additional consultation round yielded no comments, it was formally closed on 17 August 2025.

#### 4.2 Response to stakeholder comments

## 5 Report updates and approval

**This document is:** Updated SBR (surveillance audits/scope-change audits)

In October 2025, EU RED Level B reports were included in scope for France (metropolitan), Flanders, and Wallonia.

<b>Name</b>	Rens Hartkamp
<b>Title</b>	Consultant
<b>Date of report approval</b>	10 Oct 2025

<b>Name</b>	Andy Vandenberghe
<b>Title</b>	Report author
<b>Date of report approval</b>	10 Oct 2025

<b>Name</b>	Handrin Wemel
<b>Title</b>	Management representative
<b>Date of report approval</b>	10 Oct 2025

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

Belgium European area	Indicator
1.1.1	Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.
Supply Base Verifiers	<ul style="list-style-type: none"> <li>Review of applicable laws and regulations, national and regional policy frameworks.</li> <li>Identification of institutional roles and oversight functions.</li> <li>Law-enforcement, implementing regulations, relevant programs.</li> <li>Critical weblinks and data.</li> </ul> <p>Flanders: Forest Decree 1990  <a href="https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1003183¶m=informatie">https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1003183¶m=informatie</a></p> <p>Flanders: Forest Compensation and Statistics (2020 Annual Report ANB)  <a href="https://publicaties.vlaanderen.be/view-file/68494">https://publicaties.vlaanderen.be/view-file/68494</a></p> <p>Flanders: Besluit erkenning exploitanten 2002 (Recognition of harvesting companies)  <a href="https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1003183¶m=informatie">https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1003183¶m=informatie</a></p> <p>Wallonia: Code forestier (Décret du 15 juillet 2008)  <a href="https://environnement.wallonie.be/legis/dnf/forets/foret025.htm">https://environnement.wallonie.be/legis/dnf/forets/foret025.htm</a></p> <p>Wallonia: Décret modificatif du 16 avril 2020 (Art. 57)  <a href="https://www.ejustice.just.fgov.be/eli/decret/2020/04/16/2020040928/moniteur">https://www.ejustice.just.fgov.be/eli/decret/2020/04/16/2020040928/moniteur</a></p> <p>Wallonia: Code des droits d'enregistrement, d'hypothèque et de greffe  <a href="https://www.ejustice.just.fgov.be/eli/loi/2004/12/13/2004022797/justel">https://www.ejustice.just.fgov.be/eli/loi/2004/12/13/2004022797/justel</a></p> <p>Brussels-Capital Region: Code forestier and regional forest authority  <a href="https://leefmilieu.brussels">https://leefmilieu.brussels</a></p> <p>Nature areas and forest management in Brussels  <a href="https://environnement.brussels/citoyen/nos-actions/projets-et-resultats/gestion-des-reserves-naturelles-et-forestieres-bruxelles?highlight=gestion%20foresti%C3%A8re">https://environnement.brussels/citoyen/nos-actions/projets-et-resultats/gestion-des-reserves-naturelles-et-forestieres-bruxelles?highlight=gestion%20foresti%C3%A8re</a></p> <p>News article on illegal felling cases and legal commentary (HLN)  <a href="https://www.hln.be/binnenland/geen-sprake-van-illegale-boomkap-door-vlaamse-overheid~a27247d7">https://www.hln.be/binnenland/geen-sprake-van-illegale-boomkap-door-vlaamse-overheid~a27247d7</a></p> <p>News article on felling without permit (VRT NWS)  <a href="https://www.vrt.be/vrtnws/nl/2022/04/21/tientallen-bomen-in-steenokkerzeel-gekapt-zonder-vergunning">https://www.vrt.be/vrtnws/nl/2022/04/21/tientallen-bomen-in-steenokkerzeel-gekapt-zonder-vergunning</a></p> <p>Forest compensation updates (Equal Partners)  <a href="https://www.equal-partners.eu/en/news/forest-compensation-flanders">https://www.equal-partners.eu/en/news/forest-compensation-flanders</a></p> <p>Forest dashboard and spatial data tools  <a href="https://www.bosteller.be">https://www.bosteller.be</a></p> <p>Decreet Natuurbehoud (Flanders)  <a href="https://codex.vlaanderen.be/Portals/Codex/documenten/1005915.html">https://codex.vlaanderen.be/Portals/Codex/documenten/1005915.html</a></p> <p>Codex Ruimtelijke Ordening (Flanders)</p>

	<p><a href="https://codex.vlaanderen.be/Portals/Codex/documenten/1018245.html">https://codex.vlaanderen.be/Portals/Codex/documenten/1018245.html</a>  Wallonia: Code du Développement Territorial (CoDT)  <a href="https://territoire.wallonie.be/fr/codt">https://territoire.wallonie.be/fr/codt</a>  See also indicators 1.1.2, 1.1.3, 1.1.4.</p>
<b>Risk Rating justification</b>	<p>In Belgium, approximately 55% of the forest area is privately owned, with more than 100,000 individual owners managing parcels averaging 2.5 hectares. These private forests are managed either directly by the owners, by professional managers, or through cooperatives. Forest governance is regionally organised, with each of the three regions having its own legal framework and implementing agency.</p> <p>Flanders: Forest governance is based on the Forest Decree (1990) and the Nature Decree (2014), implemented by the Agentschap voor Natuur en Bos (ANB).</p> <p>Wallonia: Governed by the Code Forestier (2008), amended by the decree of 16 April 2020 (modifying article 57 of the 15 July 2008 decree), enforced by the Département de la Nature et des Forêts (DNF).</p> <p>Brussels-Capital Region: Applies the same Code Forestier as Wallonia, with implementation by Leefmilieu Brussel (BIM).</p> <p><b>Flanders</b></p> <p>The formal definition of forest under the 1990 Forest Decree includes lands where trees and woody shrub vegetation dominate and fulfil ecological, recreational, or production functions. All forests larger than 5 hectares must have a forest management plan. Public forests and private forests within the Flemish Ecological Network must submit an elaborate version. These plans are valid for 20 years and must align with the integrated forest and nature management framework introduced by the 2014 Nature Decree. About 33% of the forest area is currently covered by such plans. Forest and nature management are orientated towards reaching the European and regional conservation objectives for species and habitats. This includes an integrated 'forest and nature management plan' and integrated 'criteria for sustainable forest and nature management'.</p> <p>All forest harvesting requires a permit. Even small groups of trees (KLEs) fall under regulation via the Nature Decree and Vegetation Decree, with location-specific permissions needed. KLEs are mapped in the Biological Valuation Map (BWK). The ANB conducts compliance checks, including field inspections of harvesting plots, to ensure consistency with approved management plans.</p> <p>Harvesting companies must have tax registration and official recognition if they extract more than 50 m<sup>3</sup>/year.</p> <p><b>Wallonia</b></p> <p>Forests are defined broadly under the 2008 Code Forestier to include wooded areas and related ecological features such as marshes and fauna feeding zones. Management plans are mandatory for public forests larger than 20 hectares, but optional for private forests. Still, large private landowners and conservation NGOs often develop them voluntarily. Draft plans undergo public consultation and require approval by the DNF. Since 2023, formal</p>

evaluation of these plans is mandatory for public forests, in accordance with the Walloon decree of 16 April 2020 (amending article 57 of the decree of 15 July 2008).

Harvesting in public forests requires a permit.

Within public forests an environmental (harvesting) permit by the forest administration is required. However, on private lands, mostly a permission from the landowner suffices. On private land outside the forest zone (in agricultural or green zones as defined in spatial plans) an urban planning permit from the municipal services is obligatory.

The DNF performs inspections to verify compliance and checks whether operations align with approved management plans, laws and regulations. Small landscape elements are identified in Wallonia. They are not specifically defined as such, as in Flanders, but are protected under several rules. In Wallonia, forest fragmentation is lower, and many such small elements are already covered by management plans. A mapping and permit system exists to regulate changes, and Wallonia actively promotes the preservation of these elements.

#### Brussels region

Forests in Brussels are few but include significant areas like parts of the Sonian Forest. The region applies the same Code Forestier as Wallonia, and management is under Leefmilieu Brussel (BIM). Forests are managed with a focus on conservation and public accessibility. The legal structure and enforcement mechanisms mirror those in Wallonia.

#### Enforcement and Compliance

Across all regions, forest and nature administrations conduct inspections of harvesting activities. They verify that logging is within boundaries, uses approved haulage tracks and stacking areas, and follows the permit conditions. Large-scale destructive management operations (clearcutting) are not permitted in Belgium. For example, under article 38 §1 of the Forest Code in Wallonia, it is prohibited to clear-cut more than 5 hectares in stands comprised of more than 50% conifer species (based on basal area) and 3 hectares in stands with more than 50% broadleaved species. Nature reserves and protected areas are managed under approved plans with regular compliance monitoring.

Applications for permits are reviewed against legal criteria, and field verifications are routine. Enforcement structures are in place, though implementation capacity can vary.

Forest owners need to comply with national, provincial and local legislation. The forest owner groups ('Bosgroepen' in Flanders / 'Groupements forestiers' in Wallonia) assist in navigating the complexities involved. These groups normally have an forest management plan.

Regarding law enforcement and harvesting permits, some, such as members of the Flemish political party Groen, have raised concerns about too soft procedures on dealing with offenders. To cut a large tree, or group of trees on any kind of land, it is required to request a harvesting permit. If one gets caught, the punitive measure is, however, merely the obligation to regenerate



the trees, although the trees will be of less value than the previous ones for many decades. Moreover, the offender can also start a 'regularisation process' him/herself, after being caught. This process legalises the harvest retrospectively (this issue is therefore not addressed in indicator 1.3.1 on illegal wood). The regularisation process normally results in the obligation to compensate for the forest area. The compensation obligation can, for example, also require the establishment of trees with a certain diameter, making the operation costly. Although this can indeed be considered a loophole in the legal system, the sum of the areas effected is relatively small (around 45 ha in 2020) and the topic is currently being addressed.

The politicians raising this concern are also of the opinion that harvesting permits are given too easily in Flanders. The 2020 annual report of the Agency of Nature and Forest of Flanders, however, indicates that for the first time in 5 years there is no deficit in forest compensation: more forest had been compensated than had been converted. In Flandres there is the ambition to add 10.000 ha of forest between 2019 and 2030, currently (2025) they realised 2.128 ha new forest and 717 hectares of compensation forest. See also indicators 1.1.2, 1.1.3, 1.1.4.

#### Trees Outside Forests (TOF) – Landscape and Urban Feedstock

Note: If an indicator is also applicable to TOF – Landscape and Urban Feedstock, additional information is provided at the end of the findings.

Indicators that apply only to landscape feedstock (not to urban or infrastructure feedstock) are identified as such in the section headings.

In the three regions of Belgium, landowners are responsible for managing non-forest parcels and biomass-related maintenance activities. The regional authorities in Flanders, Wallonia, and Brussels oversee that these activities comply with applicable laws and regulations. They issue permits, verify land-use classifications and management operations, and enforce legal requirements through instruments such as the Decreet Natuurbehoud and Codex Ruimtelijke Ordening in Flanders, and the Code du Développement Territorial (CoDT) in Wallonia. These frameworks include strict rules for felling trees outside forests and require traceability of harvested biomass. In Flanders, compensating for the harvesting trees is often demanded. Belgium has a strong legal system, supported by a high level of governance.

In Flanders, for tree felling outside designated forest areas the Nature Conservation Decree mandates that individuals or entities intending to remove small groups of trees, known as "kleine landschapselementen" (small landscape elements), must obtain an environmental permit and, in many cases, are required to compensate for the loss. Compensation typically involves replanting trees or implementing other ecological measures to offset the environmental impact. The specific requirements and procedures for felling small groups of trees outside forest areas in Flanders vary by location and depend on the characteristics of the trees concerned. Enforcement and interpretation of these rules fall under the authority of the local municipality and the Agency for Nature and Forests.

	<p>Comment Foronex</p> <p>Although, considering Belgium, the indicator is low risk, our company only works with officially registered harvesting teams and requires that the harvesting teams check if an approved harvesting plan, a "harvesting authorisation", or a "urbanise permit" is present. This can also apply to the harvest of a small groups of trees outside forests. Areas without an approved management plan or permit are avoided.</p> <p>Our company sources exclusively from legally registered businesses with valid VAT numbers, ensuring compliance with applicable laws and regulations.</p>
<b>Risk Rating</b>	Low Risk

Belgium European area	Indicator
<b>1.1.2</b>	Legal ownership of land and resource use rights shall be respected.
<b>Supply Base Verifiers</b>	<ul style="list-style-type: none"> <li>• Review of legal and policy frameworks and their practical application</li> <li>• Collection of publications and data</li> <li>• Analysis of critical positions</li> </ul> <p>Belgian Civil Code – Book III: Property  <a href="https://www.ejustice.just.fgov.be/eli/wet/2020/02/04/2020020347/justel">https://www.ejustice.just.fgov.be/eli/wet/2020/02/04/2020020347/justel</a>            Farm Lease Law – Wet van 4 November 1969  <a href="https://www.ejustice.just.fgov.be/cgi_loi/change_lg.pl?language=nl&amp;la=N&amp;cn=1969110431&amp;table_name=wet">https://www.ejustice.just.fgov.be/cgi_loi/change_lg.pl?language=nl&amp;la=N&amp;cn=1969110431&amp;table_name=wet</a>  <a href="https://www.ejustice.just.fgov.be/cgi_loi/article.pl?language=nl&amp;lg_txt=n&amp;cn_ssearch=2023101313">https://www.ejustice.just.fgov.be/cgi_loi/article.pl?language=nl&amp;lg_txt=n&amp;cn_ssearch=2023101313</a>            Standardized Model Contracts for Farm Leases  <a href="https://www.comptoir-foncier.be/en/farm-leases-new-model-contracts-for-private-and-public-landlords/">https://www.comptoir-foncier.be/en/farm-leases-new-model-contracts-for-private-and-public-landlords/</a>            Rural Flanders Requests Clarification on Property Law  <a href="https://www.brusselstimes.com/184001/rural-flanders-asks-for-clarification-on-property-law">https://www.brusselstimes.com/184001/rural-flanders-asks-for-clarification-on-property-law</a>            Forest Code – Walloon Region  <a href="https://chemins.be/codeforestier">https://chemins.be/codeforestier</a>            Forest Decree – Flanders (Chapter IX, Article 51; Article 12)  <a href="https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1003183¶m=inhoud&amp;ref=search&amp;AVIDS=">https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1003183¶m=inhoud&amp;ref=search&amp;AVIDS=</a>            Nature Conservation Decree – Flanders (Articles 12septies, 12octies, 12novies)  <a href="https://codex.vlaanderen.be/Portals/Codex/documenten/1005915.html">https://codex.vlaanderen.be/Portals/Codex/documenten/1005915.html</a>            DLA Piper – Overview of Belgian zoning and planning legislation  <a href="https://www.dlapiperrealworld.com/law/index.html?c=BE&amp;s=legislation-and-planning-zoning-controls&amp;t=zoning">https://www.dlapiperrealworld.com/law/index.html?c=BE&amp;s=legislation-and-planning-zoning-controls&amp;t=zoning</a>            INBO Report (2022) – Short Rotation Coppice in Belgium  <a href="https://purews.inbo.be/ws/portalfiles/portal/86623123/Desair_etal_2022_ShortRotationCoppiceInBelgium.pdf">https://purews.inbo.be/ws/portalfiles/portal/86623123/Desair_etal_2022_ShortRotationCoppiceInBelgium.pdf</a></p>

	<p>INBO Report (2024) – Integration of Short Rotation Coppice in Belgian Agricultural Landscapes</p> <p><a href="https://purews.inbo.be/ws/portalfiles/portal/116167351/Desair_etal_2024_TheIntegrationOfShortRotationCoppiceBelgianAgriculturalLandscapes.pdf">https://purews.inbo.be/ws/portalfiles/portal/116167351/Desair_etal_2024_TheIntegrationOfShortRotationCoppiceBelgianAgriculturalLandscapes.pdf</a></p>
<b>Risk Rating justification</b>	<p>In Belgium, legal frameworks and control systems ensure the legality of land use and the ownership of harvested wood across all three regions: Flanders, Wallonia, and the Brussels-Capital Region. Forest operations are subject to regulations, and any illegal activities are typically detected and reported promptly by landowners, neighbours, or other stakeholders — partly due to Belgium's high population density and widespread public access to forests. The prevalence of recreational use further enhances this vigilance, as does routine patrolling by forest and nature administration agencies.</p> <p>Belgian civil and forest laws clearly delineate rights concerning forest use, providing a solid foundation for the enforcement of legality and ownership rights. Key legislative instruments include:</p> <ul style="list-style-type: none"> <li>- Book 3 'Property' of the Civil Code: Defines property rights, including customary rights and the procedures for resolving land ownership disputes in court.</li> <li>- Farm Lease Law – Wet van 4 November 1969 and amendments: Governs lease agreements for land use, with region-specific adaptations.</li> </ul> <p>Walloon Region: In 2021, standardised model contracts were introduced to promote written lease agreements between private and public parties. These help clarify rights and obligations and encourage transparent, consistent lease arrangements.</p> <p>Land ownership disputes are rare in Belgium. The legal system provides sufficient means to resolve such incidents through established judicial procedures. A reliable land registry system records all titles and rights and serves as a definitive legal reference. Land-use rights are identified and clear (including customary rights). On a national level are issued: the cadastre plan of lots/allotments, property certificate with survey plan (attachment to the notarial deed), and business registrations (company foundation document). Lease contracts specify land use without transferring ownership and are legally binding.</p> <p>If a land owner rents out land, this is recorded in a lease contract, stipulating the right to use the land according to the contract. In Belgium, more than 58% of forest stands are privately owned. Lease agreements for forest plots are a common practice, and a transparent system of interaction between land owners and loggers has evolved.</p> <p>In September 2021, Landelijk Vlaanderen raised concerns about Belgium's reformed property law, which allows individuals to access neighbouring land under specific conditions, such as retrieving lost items. The law, however, lacked clarity leading to fears of trespassing on fields and forests. Despite assurances from the Ministry of Justice that agricultural land is exempt, Landelijk Vlaanderen has called for a revision of the law to protect property rights. The law's vague language also affects forests, prompting calls for clearer descriptions.</p> <p>Trees Outside Forests – Landscape and Urban Feedstock</p>

	<p>In Belgium, the management of trees in urban and landscape settings is governed by regional legislation, with each of the three regions—Flanders, Wallonia, and Brussels—having distinct legal frameworks. Municipalities are responsible for implementing these regulations and may establish additional local rules. For instance, in Flanders, the Nature Decree and the Flemish Public Planning Code regulate tree protection and land use planning. Land use planning regulations outline the limits of possible interventions on lands, including the maintenance of dangerous trees or the removal of vegetation. These regulations ensure that property owners' rights are protected while allowing necessary management of outdoor spaces. Regarding willow trees, which are common in Belgian landscapes, there has been increased interest for energy plantations, but these are out of scope of the SBE.</p>
<b>Risk Rating</b>	Low Risk

Belgium European area	Indicator
<b>1.1.3</b>	Feedstock shall be legally harvested, supplied and produced, including in compliance with CITES, EUTR and other applicable legal trade requirements.
<b>Supply Base Verifiers</b>	<ul style="list-style-type: none"> <li>• Review of applicable laws and regulations</li> <li>• Legal and policy frameworks, their application, law enforcement</li> <li>• International ratings websites</li> <li>• Red lists: CITES, IUCN and red lists of the Belgian regions (not only trees)</li> <li>• Analysis of recent, reliable, and critical publications online</li> </ul> <p>Commission Delegated Regulation (EU) No 363/2012 of 23 February 2012 (on the procedural rules for the recognition and withdrawal of recognition of monitoring organizations)</p> <p>Commission implementing Regulation (EU) No 607/2012 of 6 July 2012 (detailed rules concerning the due diligence system and the frequency and nature of the checks on monitoring organizations)</p> <p>Law of 21 December 1998 on product standards to foster sustainable production and consumption patterns and to protect the environment, public health and workers</p> <p>Royal Decree of 16 November 2000 (on designation of officials of the Federal Public Service Environment to carry out inspection activities)</p> <p>Law of 25 April 2014, amending to the 'product standards law' of 21 December 1998</p> <p>Law of 28 July 1981 (and subsequent amending acts) on the approval of the CITES convention and of the Annexes, as well as the amendment to the Convention of Bonn of 22 June 1979</p> <p>Royal Decree of 9 April 2003 on protection of species of wild fauna and flora through control of the trade.</p> <p>Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) -Washington, 3 March 1973.</p>

	<p>CITES protected tree species: <a href="https://checklist.cites.org/#/en">https://checklist.cites.org/#/en</a></p> <p>WWF – EU Forest Crime Initiative: Belgium GAP Analysis  <a href="https://www.wwf.de/fileadmin/fm-wwf/Publikationen-PDF/EU-Forest-Crime-Initiative-Belgium-GAP-Analysis.pdf">https://www.wwf.de/fileadmin/fm-wwf/Publikationen-PDF/EU-Forest-Crime-Initiative-Belgium-GAP-Analysis.pdf</a></p> <p>LiveEO – EU Deforestation Regulation (EUDR) Competent Authorities (incl. Belgium)  <a href="https://www.live-eo.com/article/eudr-competent-authorities---updated-list">https://www.live-eo.com/article/eudr-competent-authorities---updated-list</a></p> <p>Greenpeace Belgium – EU Calls Out Belgium Over Illegal Timber Imports  <a href="https://www.greenpeace.org/belgium/nl/persbericht/1493/illegaal-hout-eu-roept-belgie-op-het-matje/">https://www.greenpeace.org/belgium/nl/persbericht/1493/illegaal-hout-eu-roept-belgie-op-het-matje/</a></p> <p>De Morgen – EU Starts Procedure Against Belgium Over Illegal Timber Trade  <a href="https://www.demorgen.be/nieuws/europa-start-procedure-tegen-ons-land-in-strijd-tegen-illegale-houthandel~b7c86fd7/">https://www.demorgen.be/nieuws/europa-start-procedure-tegen-ons-land-in-strijd-tegen-illegale-houthandel~b7c86fd7/</a></p> <p>World Bank – Worldwide Governance Indicators  <a href="https://www.worldbank.org/en/publication/worldwide-governance-indicators/interactive-data-access">https://www.worldbank.org/en/publication/worldwide-governance-indicators/interactive-data-access</a></p> <p>Transparency International – Corruption Perceptions Index 2024 (Belgium)  <a href="https://www.transparency.org/en/cpi/2024/index/bel">https://www.transparency.org/en/cpi/2024/index/bel</a></p> <p>Regulation (EU) 2023/1115 on deforestation-free products  <a href="https://eur-lex.europa.eu/eli/reg/2023/1115/oj">https://eur-lex.europa.eu/eli/reg/2023/1115/oj</a></p> <p>Application of EUDR Regulation on deforestation-free products delayed until December 2025  <a href="https://trade.ec.europa.eu/access-to-markets/en/news/application-eudr-regulation-deforestation-free-products-delayed-until-december-2025">https://trade.ec.europa.eu/access-to-markets/en/news/application-eudr-regulation-deforestation-free-products-delayed-until-december-2025</a></p> <p>See also indicators 1.1.1, 1.1.2 and 1.1.4.</p>
<b>Risk Rating justification</b>	<p>See also indicators 1.1.1, 1.1.2 and 1.1.4.</p> <p>In general, Belgium has an excellent governance score according to the World Bank Governance Index. In 2023, on a range from -2,5 to +2,5, Belgium scored 1.3 on 'rule of law' (relative score 88.21%, considering all nations), and 1.34 on 'control of corruption' (relative score 89,15%). Considering the Corruption Perception Index (CPI) of Transparency International, Belgium also has a good score (69 out of 100 points), it ranks on place 22 out of 180 countries (2024).</p> <p><b>EUTR/EUDR</b></p> <p>The EU Timber Regulation (EUTR), in force since 2013, aims to prevent illegally harvested timber from entering the EU market (also from EU countries). Operators must conduct due diligence to confirm legality, maintaining transparent records. This regulation will be replaced by the more comprehensive EU Deforestation Regulation (EUDR: EU Regulation 2023/1115), which entered into force in June 2023 and becomes applicable from December 2025 (June 2026 for smaller enterprises).</p> <p>Under EUDR, products must not be associated with deforestation or forest degradation occurring after 31 December 2020. For primary wood harvested in Belgium, practical compliance requirements are similar — due diligence and traceability remains crucial, but now operators will also need to provide geolocation data. Belgium's amendments to its Product Standards Law are intended to support the implementation and enforcement of the EUDR.</p>

Both the EUTR (EU Timber Regulation) and the new EUDR (EU Deforestation Regulation) are enforced centrally at the federal level by the same organisation: the Federal Public Service Health, Food Chain Safety and Environment (FPS Health). In both cases, the FPS Health collaborates with customs authorities and other relevant bodies to oversee compliance. The Service investigates wood trade, in collaboration with customs offices, and can start procedures on prosecuting and sanctioning companies. Most wood from public forests in Belgium is sold by the regional forest administrations in public 'standing stock' sales. This has as a consequence that the forest administrations are not considered as 'operators' under the EUTR. Instead, the companies harvesting and selling the wood have the responsibility to comply with the regulation. The Flemish Agency for Nature and Forests has made a brochure for managers of nature areas and forests (and harvesting companies) on how to comply with the EUTR.

#### CITES

The CITES rules have been implemented in Belgian (federal) legislation. The official authority dealing with CITES is the Federal Public Service 'Health, Food Chain Safety and Environment' - Directorate General 'Animal, Plant and Nutrition' - Office for Animal Welfare and CITES.

In Belgium, forest management policy and implementation is under the responsibility of regional authorities. Legislative acts have been developed and put into practice aimed at controlling the legal harvest of wood. For Belgium, CITES and IUCN list many flora and fauna species that need protection. CITES currently does not list any tree species for Belgium. The IUCN Red List identifies two tree species requiring conservation attention: the Service Tree (*Sorbus domestica*), classified as Vulnerable, and the European White Elm (*Ulmus laevis*), classified as Critically Endangered.

Belgium, has adopted a Red List classification of species in accordance with the criteria of the International Union for Conservation of Nature (IUCN). The forests are biodiverse and comprise of habitats for many wild animals and plants. The red-list species are protected through forestry and environmental legislation and regulations.

Additionally, there are several kinds of protected areas which take into account the presence of (endangered) species of high biodiversity value. Belgium has tree national parks and a total of 1915 protected areas. A large part of the protected areas are Natura 2000 sites.

Species protected in Belgium under EU law are protected under the Habitats Directive and the Birds Directive. The Habitats Directive has a total of 281 species on its list for Belgium, of which 65% have a poor or bad conservation status. The Birds Directive lists 255 species. 3 species are unique for Belgium.

Since this SBE covers primary wood from Belgium only, aspects related to managing the import of primary wood or wood residues from abroad are not relevant. Compliance with CITES regulations at Belgian border crossings is monitored by Belgian Customs in collaboration with the Federal Agency for the Safety of the Food Chain (FASFC).



	<p>Our internet research did not find significant critical publications concerning the implementation of the EU Timber Regulation (EUTR) and CITES regulations specifically related to primary wood harvested in Belgium. There are general publications on the EUTR's impact, including enforcement challenges and recommendations for improvement, but they do not highlight specific issues pertaining to Belgium's primary wood sector. Similarly, studies on CITES implementation focus on global or regional contexts without singling out issues related to Belgium's primary wood production.</p> <p>In 2017, the European Commission initiated infringement proceedings against Belgium for insufficient enforcement of the EU Timber Regulation (EUTR), which aims to prevent illegal timber from entering the EU market. Belgium was given two months to address these concerns. However, publicly available information does not detail the outcome of this specific case. Greenpeace and later WWF have investigated and criticized Belgium's weak inspections and lack of sanctions despite significant timber imports from high-risk countries. At the time, Belgium's inspections were managed by only one part-time official.</p> <p>In 2023, the Commission opened an infringement proceedings against Belgium for failing to fully transpose the Renewable Energy Directive into national law, indicating ongoing challenges in meeting EU environmental obligations.</p> <p>Trees Outside Forests (TOF) – Landscape and Urban Feedstock</p> <p>The same applies to landscape and urban feedstock. In Belgium, tree felling and biomass sourcing from areas outside designated forests are subject to regional regulatory frameworks covering legal compliance, sustainability, and environmental protection (see 1.1.1 and 1.1.2). Commercial harvesting of wood from Trees Outside Forests (TOF) is also subject to the EUTR and EUDR.</p>
<b>Risk Rating</b>	Low Risk

Belgium European area	Indicator
<b>1.1.4</b>	Payments for harvest rights and feedstock, including duties, relevant royalties and taxes related to timber harvesting shall be complete and up-to-date.
<b>Supply Base Verifiers</b>	<ul style="list-style-type: none"> <li>• Review of applicable laws and regulations</li> <li>• Legal and policy frameworks, their application, law-enforcement</li> <li>• Internet research on payment issues in Belgian forestry</li> <li>• Analysis of recent, reliable, and critical publications online</li> </ul> <p>Crossroads Bank for Enterprises (CBE)  <a href="https://economie.fgov.be/en/themes/enterprises/crossroads-bank-enterprises">https://economie.fgov.be/en/themes/enterprises/crossroads-bank-enterprises</a>            Registration in the Crossroads Bank for Enterprises (CBE)  <a href="https://economie.fgov.be/en/themes/enterprises/crossroads-bank-enterprises/registration-crossroads-bank">https://economie.fgov.be/en/themes/enterprises/crossroads-bank-enterprises/registration-crossroads-bank</a>            VAT – Registration, Change, and Cancellation of Activity   FPS Finance  <a href="https://finance.belgium.be/en/enterprises/vat/declaration/registration-change-">https://finance.belgium.be/en/enterprises/vat/declaration/registration-change-</a></p>

	<p>cancellation-activity</p> <p>Federal Public Service Finance – VAT Regulations  <a href="https://finance.belgium.be/en/enterprises/vat">https://finance.belgium.be/en/enterprises/vat</a></p> <p>Federal Public Service Economy – Business Regulations  <a href="https://economie.fgov.be/en">https://economie.fgov.be/en</a></p> <p>World Bank – Worldwide Governance Indicators  <a href="https://www.worldbank.org/en/publication/worldwide-governance-indicators/interactive-data-access">https://www.worldbank.org/en/publication/worldwide-governance-indicators/interactive-data-access</a></p> <p>Transparency International – Corruption Perceptions Index 2024  <a href="https://www.transparency.org/en/cpi/2024/index/bel">https://www.transparency.org/en/cpi/2024/index/bel</a></p> <p>Preferred by Nature – Timber Risk Assessment: Belgium  <a href="https://www.preferredbynature.org/sites/default/files/library/2018-12/NEPCon-TIMBER-Belgium-Risk-Assessment-EN-V1.3.pdf">https://www.preferredbynature.org/sites/default/files/library/2018-12/NEPCon-TIMBER-Belgium-Risk-Assessment-EN-V1.3.pdf</a></p> <p>Legal Systems in Belgium – Thomson Reuters Practical Law  <a href="https://uk.practicallaw.thomsonreuters.com/w-019-2986">https://uk.practicallaw.thomsonreuters.com/w-019-2986</a></p> <p>Litigation &amp; Dispute Resolution – ICLG  <a href="https://iclg.com/practice-areas/litigation-and-dispute-resolution-laws-and-regulations/belgium">https://iclg.com/practice-areas/litigation-and-dispute-resolution-laws-and-regulations/belgium</a></p> <p>Litigation 2025 – Belgium – Chambers and Partners  <a href="https://practiceguides.chambers.com/practice-guides/litigation-2025/belgium">https://practiceguides.chambers.com/practice-guides/litigation-2025/belgium</a></p> <p>Research Guide to Belgian Law – GlobalLex  <a href="https://www.nyulawglobal.org/globalex/belgium1.html">https://www.nyulawglobal.org/globalex/belgium1.html</a></p> <p>Conducting Litigation in Belgium – Lexology  <a href="https://www.lexology.com/library/detail.aspx?g=469d1ac9-01c6-4ec0-bec4-424f18a17015">https://www.lexology.com/library/detail.aspx?g=469d1ac9-01c6-4ec0-bec4-424f18a17015</a></p> <p>Civil Law in Belgium – Lawyers Belgium  <a href="https://lawyersbelgium.com/civil-law-in-belgium">https://lawyersbelgium.com/civil-law-in-belgium</a></p> <p>Judicial Systems Belgium – EATJN  <a href="https://www.eajtn.com/judicial-systems/belgium">https://www.eajtn.com/judicial-systems/belgium</a></p>
<b>Risk Rating justification</b>	<p>Belgium ranks highly on the World Bank Governance Index and performs well on the Corruption Perceptions Index (CPI) published by Transparency International, reflecting strong institutional quality and low levels of corruption. The country has a transparent and well-enforced tax system, supported by a solid legal framework governing payments.</p> <p>Forest legislation is regionally determined, with Flanders, Wallonia, and Brussels each having their own regulations. While Belgium does not impose timber-specific royalties, it applies corporate income tax, collects stumpage fees, and may require reforestation contributions. VAT applies to all timber sales, but it is not a cost between VAT-registered companies. Regional forest administrations are responsible for collecting harvesting-related fees.</p> <p>Entities involved in timber activities, both individuals and companies, must pay income or corporate taxes. They are required to keep detailed accounting records, retain financial data for at least seven years, and file annual tax returns. Standardised digital systems and data-sharing mechanisms enable effective tax oversight, leaving little room for evasion or error.</p> <p>All timber-related businesses must be registered with the Crossroads Bank for Enterprises (CBE), which serves as the central government registry of all businesses and self-employed persons in Belgium. Despite its name, the</p>

	<p>CBE is not a financial institution, but a public administrative database managed by the Federal Public Service Economy, the authority responsible for business registration, trade regulation, and market oversight. Registration in the CBE is mandatory before starting any economic activity. The process is handled through accredited business counters. Each business receives a unique enterprise number used for all official interactions with public authorities, including tax and social security. In addition to CBE registration, companies must also be registered with the Tax Office, and depending on their legal form and sector, may need to register with the Chamber of Commerce. These registrations ensure full legal recognition and integration into Belgium's administrative system.</p> <p>Companies must comply with strict VAT regulations, including issuing correct invoices, maintaining structured and traceable financial records, and submitting VAT returns. It is legally required to state VAT on all invoices. The Federal Public Service of Finance oversees compliance. Enforcement is considered effective and the system allows little space for error.</p> <p>In Flanders, any company harvesting more than 50 m³ of timber per year must obtain official recognition from the forest administration. This requirement ensures compliance with legal obligations related to taxation, employment, safety, and business conduct.</p> <p>While individual civil disputes may occur, there is no substantial evidence of widespread lawsuits between forest harvesting companies and their clients in Belgium. The judicial system is robust and well-equipped to resolve such cases when they arise.</p> <p>Trees Outside Forests (TOF) – Landscape and Urban Feedstock The same applies to TOF Urban and landscape feedstock.</p> <p>Comment Foronex Foronex only fulfils payments on basis of invoices via a bank transfer. Cash payments would compromise and complicate material balances, financial administration and tax assessments.</p>
<b>Risk Rating</b>	Low Risk

Belgium European area	Indicator
<b>1.1.5</b>	There shall be adequate protection of the Supply Base from unauthorised and illegal activities, such as illegal logging, mining, and encroachment.
<b>Supply Base Verifiers</b>	<ul style="list-style-type: none"> <li>• Review of applicable laws and regulations</li> <li>• Legal and policy frameworks, their application, law-enforcement</li> <li>• Analysis of recent and critical publications</li> </ul> <p>Forest Decree (Bosdecreet), Flanders  <a href="https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=10031837&amp;m=informatie">https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=10031837&amp;m=informatie</a>            Code forestier, Wallonia</p>

	<p><a href="http://environnement.wallonie.be/legis/menucode.htm">http://environnement.wallonie.be/legis/menucode.htm</a> Ordonnance relative à la forêt, Brussels <a href="https://leefmilieu.brussels/themas/natuur-en-biodiversiteit/bescherming-van-de-natuur/wetgeving-bescherming-van-de-natuur">https://leefmilieu.brussels/themas/natuur-en-biodiversiteit/bescherming-van-de-natuur/wetgeving-bescherming-van-de-natuur</a> Agentschap voor Natuur en Bos (ANB), Flanders <a href="https://www.natuurenbos.be/over-het-anb">https://www.natuurenbos.be/over-het-anb</a> Département de la Nature et des Forêts (DNF), Wallonia <a href="https://environnement.wallonie.be/home/legislation/nature-et-forets.html">https://environnement.wallonie.be/home/legislation/nature-et-forets.html</a> Brussels Environment (Leefmilieu Brussel) <a href="https://leefmilieu.brussels/">https://leefmilieu.brussels/</a> Flemish Nature Inspectorate – Handhavingsrapporten <a href="https://www.natuurenbos.be/publicaties/publicaties/handhavingsrapporten">https://www.natuurenbos.be/publicaties/publicaties/handhavingsrapporten</a> Wallonia – Strategy against environmental crime <a href="https://www.wallonie.be/fr/actualites/delinquance-environnementale-entree-en-vigueur-du-nouveau-decret">https://www.wallonie.be/fr/actualites/delinquance-environnementale-entree-en-vigueur-du-nouveau-decret</a> Belgium Governance Indicators – World Bank <a href="https://databank.worldbank.org/source/worldwide-governance-indicators">https://databank.worldbank.org/source/worldwide-governance-indicators</a> Transparency International – Corruption Perceptions Index <a href="https://www.transparency.org/en/countries/belgium">https://www.transparency.org/en/countries/belgium</a> Publications Vlaanderen – General enforcement overview <a href="https://publicaties.vlaanderen.be/view-file/68633">https://publicaties.vlaanderen.be/view-file/68633</a></p>
<b>Risk Rating justification</b>	<p>In Belgium, the protection of the supply base from illegal activities such as unauthorised logging, mining, or encroachment is regulated through regional forest laws: the Forest Decree in Flanders, the Code forestier in Wallonia, and the Ordonnance forêt in Brussels. Enforcement is managed by the regional forest administrations (ANB, DNF, and Brussels Environment), which oversee permitting, conduct field inspections, and impose administrative fines when necessary.</p> <p>Serious violations are prosecuted under the Belgian Penal Code, with cases handled by the public prosecutor. Investigations may be conducted by officially authorised forestry inspectors, often in cooperation with the police or specialised environmental enforcement officers. Courts can impose fines, order the confiscation of timber, or apply other legal penalties.</p> <p>Unauthorised activities such as illegal logging, mining, and encroachment are rare in Belgium, as land boundaries are clearly defined by the central cadastre system. In general, harvesting teams and local landowners have no interest in jeopardising their reputation or legal standing. Nonetheless, occasional cases may occur, typically due to a company’s misunderstanding of permitting requirements.</p> <p>If encroachment happens, it is likely a limited offence by mistake. Such cases are successfully solved between the parties, either by negotiations, or in court. In Belgium there are several out-of-court mechanisms to solve such activities.</p> <p>Local societies and civilians are attentive and ready to inform the landowner. Notifications of unauthorised activities, sometimes prove to legal after all. In case illegal activities are encountered, the (public or private) landowner can submit the offence, and an investigation will start. Dependent on the case, could be involved, for example, inspectors of the regional forest and nature</p>

	<p>administration, the Flemish Nature Inspection, the Investigation Unit for Serious Crime of Wallonia, and/or the police. At the municipalities there are employees ready to help.</p> <p>The justice system is considered to be working properly. Belgium has a good governance score according to the World Bank Governance Index, and scores low on corruption according to Transparency international.</p> <p>Since the supply base is defined as Belgium as a whole, rather than a specific area belonging to an individual landowner, this indicator largely overlaps with the general legality indicators 1.1.1, 1.1.2, and 4.2.5. Indicator 4.1.9 specifically addresses mechanisms for resolving grievances and disputes.</p> <p>Comment Foronex</p> <p>Foronex routinely requests the legal basis for conducting harvests and has, in some cases, identified missing permits. The situation is then investigated in cooperation with the relevant authorities, and the timber is not accepted until legal compliance is established.</p>
<b>Risk Rating</b>	Low Risk

Belgium European area	Indicator
<b>2.1.1</b>	Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.
<b>Supply Base Verifiers</b>	<p>Applicable laws, regulations and policy frameworks</p> <p>EU Habitats Directive – Annex I forest habitats  <a href="https://eunis.eea.europa.eu/habitats/10185">https://eunis.eea.europa.eu/habitats/10185</a><a href="https://eunis.eea.europa.eu/habitats/10187">https://eunis.eea.europa.eu/habitats/10187</a></p> <p>Natura 2000 viewer – Belgium site boundaries and Standard Data Forms (SDFs)  <a href="https://natura2000.eea.europa.eu/#">https://natura2000.eea.europa.eu/#</a></p> <p>Wallonia: Circulaire 2556 (14 April 1995) and Circulaire 2619 (22 Sept. 1997)(Cited in forestry practice – source in Walloon forestry documentation)</p> <p>Convention on Biological Diversity – Belgium party page  <a href="https://www.cbd.int/countries/?country=be">https://www.cbd.int/countries/?country=be</a></p> <p>CITES species database – Belgium implementation  <a href="https://www.speciesplus.net">https://www.speciesplus.net</a></p> <p>Flanders Forest Act (Bosdecreet)  <a href="https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1003183&amp;m=informatie">https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1003183&amp;m=informatie</a></p> <p>Flemish Nature Decree (Natuurdecreet) 1997  <a href="https://www.vlaanderen.be/natuurdecreet">https://www.vlaanderen.be/natuurdecreet</a></p> <p>Forest Code and Environmental Code – Wallonia  <a href="https://environnement.wallonie.be/home/legislation/nature-et-forets.html">https://environnement.wallonie.be/home/legislation/nature-et-forets.html</a></p> <p>Brussels Nature Conservation Ordinance (Ordonnantie natuurbehoud)  <a href="https://leefmilieu.brussels/themas/natuur-en-biodiversiteit/natuurgebieden-en-bescherming/het-natuurbeschermingsbeleid">https://leefmilieu.brussels/themas/natuur-en-biodiversiteit/natuurgebieden-en-bescherming/het-natuurbeschermingsbeleid</a></p>



	<p>Institutional roles and oversight functions (incl. law enforcement)</p> <p>Agency for Nature and Forest (ANB) – Flanders  <a href="https://www.natuurenbos.be/over-ons/publicaties">https://www.natuurenbos.be/over-ons/publicaties</a></p> <p>Département de la Nature et des Forêts (DNF) – Wallonia  <a href="https://agriculture.wallonie.be/">https://agriculture.wallonie.be/</a></p> <p>Bruxelles Environnement – Forest and nature management  <a href="https://environnement.brussels/thematiques/nature">https://environnement.brussels/thematiques/nature</a></p> <p>EEA – EU habitat status and reporting under Art. 17  <a href="https://www.eea.europa.eu/themes/biodiversity/state-of-nature-in-the-eu">https://www.eea.europa.eu/themes/biodiversity/state-of-nature-in-the-eu</a></p> <p>UNESCO Intangible Cultural Heritage – Belgium  <a href="https://ich.unesco.org/en/state/belgium-BE?info=periodic-reporting&amp;utm_source=chatgpt.com">https://ich.unesco.org/en/state/belgium-BE?info=periodic-reporting&amp;utm_source=chatgpt.com</a></p> <p>UNESCO World Heritage List – Belgium  <a href="https://whc.unesco.org/en/statesparties/be">https://whc.unesco.org/en/statesparties/be</a></p> <p>Flanders Heritage Agency (Agentschap Onroerend Erfgoed)  <a href="https://www.onroerenderfgoed.be">https://www.onroerenderfgoed.be</a></p> <p>Agence Wallonne du Patrimoine (AWaP)  <a href="https://www.awap.be">https://www.awap.be</a>  <a href="https://agencewallonnedupatrimoine.be/wp-content/uploads/2024/05/2024_SPW_AWaP_Copat_brochureUsager.pdf">https://agencewallonnedupatrimoine.be/wp-content/uploads/2024/05/2024_SPW_AWaP_Copat_brochureUsager.pdf</a></p> <p>Urbanism and Heritage – Brussels  <a href="https://urban.brussels/thematiques/patrimoine">https://urban.brussels/thematiques/patrimoine</a></p> <p>Analysis of practical performance by minimum and typical actors</p> <p>Natura 2000 online map viewer and SDFs  <a href="https://natura2000.eea.europa.eu/#">https://natura2000.eea.europa.eu/#</a></p> <p>On biodiversity and forest health – Wallonia  <a href="https://orbi.uliege.be/handle/2268/179245">https://orbi.uliege.be/handle/2268/179245</a></p> <p>Geopunt – Flanders GIS and planning tool  <a href="https://www.geopunt.be">https://www.geopunt.be</a></p> <p>Ancient and Primeval Beech Forests of the Carpathians and Other Regions of Europe – UNESCO listing  <a href="https://whc.unesco.org/en/list/1133/">https://whc.unesco.org/en/list/1133/</a></p> <p>FSC NRA Belgium  <a href="https://fsc.org/en/document-centre/documents/resource/397">https://fsc.org/en/document-centre/documents/resource/397</a></p> <p>Critical review based on secondary sources</p> <p>EEA – State of Nature in the EU 2020 report  <a href="https://www.eea.europa.eu/publications/state-of-nature-in-the-eu-2020">https://www.eea.europa.eu/publications/state-of-nature-in-the-eu-2020</a></p> <p>HCV Network – official HCV definitions and tools  <a href="https://www.hcvnetwork.org">https://www.hcvnetwork.org</a></p> <p>Peer-reviewed forest biodiversity analysis (Wallonia)  <a href="https://orbi.uliege.be/handle/2268/179245">https://orbi.uliege.be/handle/2268/179245</a></p> <p>UNESCO overview – cultural and natural values in Belgium  <a href="https://whc.unesco.org/en/statesparties/be">https://whc.unesco.org/en/statesparties/be</a></p> <p>EU RED II / RED III  <a href="https://energy.ec.europa.eu/topics/renewable-energy/renewable-energy-">https://energy.ec.europa.eu/topics/renewable-energy/renewable-energy-</a></p>
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	<p>directive-targets-and-rules_en</p> <p>Biodiversity Platform – Belgium national pages</p> <p><a href="https://biodiversity.europa.eu/countries/belgium">https://biodiversity.europa.eu/countries/belgium</a></p>
<b>Risk Rating justification</b>	<p>HCV 1 – Species diversity: concentrations of biological diversity including endemic species, and rare, threatened, or endangered species that are significant at global, regional, or national levels.</p> <p>All three Belgian regions have implemented laws and regulations to identify and map protected species, biodiversity and their habitats, including endemic species, and species that are in decline and/or rare, and represent a significant ecological value on a global, regional, or national level.</p> <p>See also HCV 3.</p> <p>HCV 2 – Landscape-level ecosystems and mosaics: Intact forest landscapes and large landscape - level ecosystems and ecosystem mosaics that are significant at global, regional or national levels, and that contain viable populations of the great majority of the naturally occurring species in natural patterns of distribution and abundance.</p> <p>There are no forest ecosystems in Belgium that meet the definition for large, landscape-level ecosystems or ecosystem mosaics that contain viable populations of the great majority of the naturally occurring species in natural patterns of distribution and abundance.</p> <p>The Ardennes Forest is a region of extensive forests, rolling hills and ridges primarily in Wallonia and Luxembourg, extending into Germany and France. It is a large forest landscape what is managed in a multi-functional, intensive, but sustainable manner. The forest is a patchwork of ecosystem mosaics. The natural occurring species are maintained. High conservation value areas and environmentally valuable ecosystems are well mapped and identified.</p> <p>HCV 3 – Ecosystems and habitats: rare, threatened, or endangered ecosystems, habitats or refugia</p> <p>Regional authorities assess the presence and spatial distribution of rare, threatened, and endangered habitats and ecosystems. In Flanders, this is carried out by the Agentschap voor Natuur en Bos (ANB) under the Flemish Ministry of Environment. In Wallonia, the task falls to the Département de la Nature et des Forêts (DNF), part of the Service public de Wallonie – Agriculture, Ressources naturelles et Environnement (SPW ARNE). In Brussels, Brussels Environment is responsible. These agencies are in charge of environmental assessments, forest mapping, and forest inventory. These efforts contribute to the designation of protected areas such as Natura 2000 sites, forest and nature reserves, and national parks. Scientific institutions and expert commissions often support the regional authorities to ensure data quality and consistency.</p> <p>Forest inventory involves systematic data collection on forest composition, structure, and ecological value, supporting the identification and monitoring of key ecosystems and habitats. Regional forest inventories are conducted approximately every 10 to 15 years, while mapping for forest management plans takes place more frequently.</p> <p>Regarding forest management by large or groups of forest owners, all three</p>

regions have implemented laws and regulations to identify and map rare, threatened, or endangered ecosystems, habitats or refugia during forest management. A system including harvesting permits and online mapping systems are publicly available and guarantee a proper implementation of laws and regulations without much room for mistakes. Law enforcement is on a sufficient level as well.

Protected areas are, for example Natura2000 sites, European Bird and Habitat sites, and nature and forest reserves. In Flanders and Brussels there are also Speciale Beschermings Zone's (SBZ), and Biological Hotspots. In all regions there are national parks. Wallonia also defines and maps 'ancient forests', which are subject to special attention. However, these forests do not have a legally binding status as yet.

In Belgium there are no forest ecosystems that are classified as a Global 200 Ecoregion, but there are 9 'Priority forest habitats' recognised under the EU Habitats Directive and 9 Ramsar sites (protected wetlands).

The Natura2000 sites have the goal to protect the most valuable and threatened plants and animals and their habitats, and where necessary develop and restore them. The Natura 2000 network comprises the 'Special Protection Areas' (SPA) designated under the EU Birds Directive and the 'Sites of Community Importance' (SCI) under the EU Habitats Directive. Special commissions identified and mapped the Natura 2000 areas.

HCV 4 – Critical ecosystem services: basic ecosystem services in critical situations, including protection of water catchments and control of erosion of vulnerable soils and slopes.

Areas at risk, such as water catchments, vulnerable soils, and slopes, have been identified and mapped. In Wallonia, the Department of Nature and Forests has designated around 37,000 ha as priority areas for this function. These include hydromorphic soils, peat and acid peat soils, slopes, watercourses and their riparian zones, springs, water catchments, and dam reservoirs. Similar mapping and protective measures are implemented in Flanders and the Brussels Region, though on a smaller scale.

HCV 5 – Community needs: Sites and resources fundamental for satisfying the basic necessities of local communities or indigenous peoples (for livelihoods, health, nutrition, water, etc.), identified through engagement with these communities or indigenous peoples.

In Belgium there are no local communities or indigenous people, who rely directly on forests to meet basic subsistence needs such as food, fuelwood, shelter, or traditional medicine. Although the forests are important for local economies and are the source of income of many people, it is not considered related to this HCV. This HCV concerns the direct fulfilment of basic needs of people dependent on forests.

The functions of forests, including the recreational function, and, for example, aspects regarding the availability of clean air and (drink) water are well developed in Belgium. Relevant areas and objects are identified and mapped.

HCV 6 – Cultural values: sites, resources, habitats, and landscapes of global or national cultural, archaeological, or historical significance, and/or of critical cultural, ecological, economic, or religious/sacred importance for the traditional cultures of local communities or indigenous peoples, identified through engagement with these local communities or Indigenous Peoples. The three Belgian districts have identified and mapped cultural heritage sites and features, as also areas of national cultural significance. Some of these sites can be found in forests. Also archaeological sites and features have been identified and mapped.

In Belgium there are two UNESCO commissions: The ‘Flanders UNESCO Commission’; and the ‘Commission Belge Francophone et Germanophone pour l’UNESCO’. In 2022, there are 14 cultural UNESCO World Heritage sites listed in Belgium and one natural site. Only a few of the cultural sites are located in green areas. In practice, there is practically no risk these areas will be damaged by harvesting operations. The natural sites fall under the category ‘Ancient and Primeval Beech Forests of the Carpathians and Other Regions of Europe’. Regarding Belgium, this category covers five separate (identified and mapped) forests. They are grouped within 10 km distance from each other, to the south of Brussels. Nevertheless, the forests are located in Flanders, Wallonia, and Brussels. There are no Belgium sites on the list of ‘World Heritage sites in Danger’.

If an object of cultural, archaeological, or historical significance is discovered during planning or operations, the law requires that it be reported immediately to the relevant regional authority: Agentschap Onroerend Erfgoed (Flanders); Agence Wallonne du Patrimoine (AWaP); and Brussels Urbanism and Heritage. These organisations are responsible for evaluating, documenting, and protecting such discoveries. Unauthorised removal or failure to report may lead to legal penalties.

The updated Walloon Heritage Code (CoPat), effective from June 1, 2024, aims to enhance legal stability and administrative efficiency in heritage management. Key reforms include the introduction of a distinct heritage authorization separate from urban planning permits, the establishment of expedited procedures for recurring events, and the implementation of preliminary archaeological assessments for major projects. Additionally, the code sets defined timelines for classification processes and introduces a dedicated regime for heritage-related infractions and sanctions.

#### Trees Outside Forests (TOF) – Landscape Feedstock (only)

In Belgium, the legal frameworks for trees in landscapes differ by region but share a common basis in biodiversity protection and HCV identification. Landscapes fall under broader conservation and spatial planning laws that safeguard ecological functions and protected species. Instruments such as the Flemish, Walloon, and Brussels Red Lists of threatened species, the EU-wide Natura 2000 framework, and species protection laws—including the Royal Decree of 9 April 2003—apply nationwide and cover both forest and non-forest areas. International frameworks like CITES and the IUCN Red List also contribute to identifying and protecting high conservation value species in Belgium. Mapping tools and site inspections support enforcement.

	<p>In Flanders, the Decreet Natuurbehoud and Codex Ruimtelijke Ordening require permits for felling and, in some cases, for maintenance such as pruning, especially for ecologically valuable trees or mapped small landscape elements. Compensation may be required. In Wallonia, the Code du Développement Territorial (CoDT) applies, with permit requirements depending on zoning. Brussels follows similar rules under the Ordonnantie Natuurbehoud.</p> <p>Comment Foronex</p> <p>Regarding the identification and mapping of HCV1 and HCV3, it is important to recognise that ecological conditions are dynamic. High Conservation Value (HCV) species and habitats may emerge in new locations, sometimes within a short period of time. To ensure that HCV1 and HCV3 values are adequately identified and managed, harvesting plots need to be assessed prior to the commencement of operations.</p> <p>Under this indicator (2.1.1), the general framework for assessing HCV1 and HCV3 in Belgium is considered. This includes the main organisational processes for identifying and mapping HCVs, the designation of protected areas, forest inventory practices, and other regionally relevant factors. The need for plot-level verification and mapping of ecological values before forest operations is addressed in the subsequent biodiversity indicator 2.1.3. Indicators 2.1.2 and 2.1.3 are Specified Risk.</p>
<b>Risk Rating</b>	Low Risk

Belgium European area	Indicator
<b>2.1.2</b>	Threats to and impacts on the identified key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified and evaluated.
<b>Supply Base Verifiers</b>	<ul style="list-style-type: none"> <li>• Ratified and implemented conventions</li> <li>• Legislation and regulations, authorities and law-enforcement</li> <li>• Databases, and critical publications</li> </ul> <p>EEA – State of Nature in Europe: A Health Check (2023)  <a href="https://www.eea.europa.eu/en/topics/at-a-glance/nature/state-of-nature-in-europe-a-health-check">https://www.eea.europa.eu/en/topics/at-a-glance/nature/state-of-nature-in-europe-a-health-check</a></p> <p>EEA – Conservation status of habitats under the EU Habitats Directive  <a href="https://www.eea.europa.eu/en/analysis/indicators/conservation-status-of-habitats-under">https://www.eea.europa.eu/en/analysis/indicators/conservation-status-of-habitats-under</a></p> <p>European Environment Agency – habitat status reporting (Art. 17)  <a href="https://www.eea.europa.eu/themes/biodiversity/state-of-nature-in-the-eu">https://www.eea.europa.eu/themes/biodiversity/state-of-nature-in-the-eu</a></p> <p>OECD Environmental Performance Review – Belgium (2021)  <a href="https://www.oecd.org/environment/country-EEA-State-of-Nature-in-Europe-A-Health-Check-(2023)-reviews/oecd-environmental-performance-reviews-belgium-2021-80f4d1b5-en.htm">https://www.oecd.org/environment/country-EEA-State-of-Nature-in-Europe-A-Health-Check-(2023)-reviews/oecd-environmental-performance-reviews-belgium-2021-80f4d1b5-en.htm</a></p> <p>EU Habitats Directive – Annex I forest habitats habitats (examples)</p>



	<p> <a href="https://eunis.eea.europa.eu/habitats/10185">https://eunis.eea.europa.eu/habitats/10185</a>  <a href="https://eunis.eea.europa.eu/habitats/10187">https://eunis.eea.europa.eu/habitats/10187</a>  <a href="https://eunis.eea.europa.eu/habitats/10045">https://eunis.eea.europa.eu/habitats/10045</a>  Natura 2000 viewer – Belgium site boundaries and SDFs  <a href="https://natura2000.eea.europa.eu/#">https://natura2000.eea.europa.eu/#</a>  Convention on Biological Diversity – Belgium party page  <a href="https://www.cbd.int/countries/?country=be">https://www.cbd.int/countries/?country=be</a>  Geopunt – forest parcel location and mapping (Flanders)  <a href="https://www.geopunt.be">https://www.geopunt.be</a>  Red List of Threatened Species (Belgium – National and Regional)  <a href="https://www.sciencedirect.com/science/article/pii/S0006320724001307">https://www.sciencedirect.com/science/article/pii/S0006320724001307</a>  Natura 2000 – European Environment Agency  <a href="https://www.eea.europa.eu/themes/biodiversity/natura-2000/the-natura-2000-protected-areas-network">https://www.eea.europa.eu/themes/biodiversity/natura-2000/the-natura-2000-protected-areas-network</a>  CITES – Species Protected under International Trade Rules (Belgium)  <a href="https://www.health.belgium.be/en/animals-and-plants/cites/species-protected-cites">https://www.health.belgium.be/en/animals-and-plants/cites/species-protected-cites</a>  IUCN European Red List Portal  <a href="https://www.iucnredlist.org/regions/european-red-list">https://www.iucnredlist.org/regions/european-red-list</a>  See also indicator 2.1.1. </p>
<b>Risk Rating justification</b>	<p> HCV 1 – Species diversity: concentrations of biological diversity including endemic species, and rare, threatened, or endangered species that are significant at global, regional, or national levels.  Belgium is a signatory to multiple international agreements such as the Habitats Directive, the Convention on Biological Diversity (CBD), and CITES, aimed at protecting biodiversity.  A system including harvesting permits and online mapping systems are publicly available and guarantee a proper implementation of laws and regulations without much room for mistakes. Law enforcement is on a sufficient level as well.  Forest inspectors supervise and/or check the result of the forest operations. They check if every requirement of the felling licence (and management plan) is fulfilled, including mandatory rules about conserving habitats and vegetations with high conservation value.  However, in some cases a permit and a management plan are not obligatory. See also specified risk for HCV 3. (indicator 2.1.2) and related concerns with permits in indicator 1.1.1. </p> <p> HCV 2 – Landscape-level ecosystems and mosaics: Intact forest landscapes and large landscape - level ecosystems and ecosystem mosaics that are significant at global, regional or national levels, and that contain viable populations of the great majority of the naturally occurring species in natural patterns of distribution and abundance.  There are no forest ecosystems in Belgium that meet the definition for large, landscape-level ecosystems or ecosystem mosaics that contain viable populations of the great majority of the naturally occurring species in natural patterns of distribution and abundance. </p>

HCV 3 – Ecosystems and habitats: rare, threatened, or endangered ecosystems, habitats or refugia: Much has been done in Belgium on the protection of HCV3, several kinds of protection areas have been founded to conserve high-value ecosystems, providing a home to endangered and threatened flora and fauna species.

Regarding the many protected and conservation areas in Belgium, the 'control systems and procedures to identify and address potential threats' are sufficiently strict. The areas are also sufficiently inspected and monitored by the authorities.

Whenever high-conservation ecosystems and habitats have been found (identified and mapped, indicator 2.1.1), then there are sufficient control systems and procedures to protect and conserve them (in regular forests, wood lands and other areas). A system including permits and online maps is publicly available, and guarantees a proper implementation of laws and regulations without much room for mistakes. However, there are exceptions, in which a permit and a management plan are not obligatory.

In general, harvesting regimes have a low impact, and natural ecosystems are recovering. For example, the lynx and the wolf have returned to the forest.

The European Environment Agency (EEA) monitors every six years for each biogeographical region the condition of habitats and species compared to the favourable status as described in the Habitats Directive. The EEA reports that 10 Annex I habitat types (which are also HCV forests) are under severe pressure in Belgium. They have the red status, meaning: "Bad: the habitat is in serious danger of disappearing". It concerns the following habitat types and codes (Annex I EU Habitats Directive):

- 9110 - Luzulo-Fagetum beech forests
- 9120 - Atlantic acidophilous beech forests with Ilex and sometimes also Taxus in the shrublayer (Quercion roburi-petraeae or Ilici-Fagenion)
- 9130 - Asperulo-Fagetum beech forests
- 9160 - Sub-Atlantic and medio-European oak or oak-hornbeam forests of the Carpinion betuli
- 9180 - Tilio-Acerion forests of slopes, screes and ravines
- 9190 - Old acidophilous oak woods with Quercus robur on sandy plains
- 91D0 – Bog woodland
- 91E0 - Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae)
- 91F0 - Riparian mixed forests of Quercus robur, Ulmus laevis and Ulmus minor, Fraxinus excelsior or Fraxinus angustifolia, along the great rivers (Ulmenion minoris)
- 2180 - Wooded dunes of the Atlantic, Continental and Boreal region

The Natura 2000 areas in Belgium are indicated and described online. The Natura 2000 online map indicates, for example, if the site harbours one or more of the 9 HCV forest types that are indicated red. If one opens the Standard Data Form (SDF) of the Natura 2000 site, one can find the (forest) ecosystems present onsite and the treats they encounter.

As of April 2025, most of the relevant Natura 2000 sites are indicated in red. Although the Standard Data Forms (SDFs) for all Belgian Natura 2000 areas

state that no formal management plan exists (Section 6.2), in practice, management plans do exist but vary in quality. Relevant organisations involved in this topic have been contacted for clarification.

Given the current status, the nine forest types (Annex I habitats) mentioned above are regarded under threat, unless demonstrated otherwise on a case-by-case basis. These forests, or elements of these forest types occur within and outside Natura 2000 areas.

See also related concerns in indicator 1.1.1.

HCV 4 – Critical ecosystem services: basic ecosystem services in critical situations, including protection of water catchments and control of erosion of vulnerable soils and slopes.

Relevant functions to this HCV are erosion control, flooding control, barriers against fires and clean water catchments. Erosion and runoff is sufficiently prevented by the regular forestry laws and regulations. Harvesting permits (and approved forest management plans) are issued with the provision that the condition of the forest will not deteriorate. Forest management and harvesting operations are evaluated by regional authorities, they check its location and consider the risks.

The around 37.000 hectares of public forests in Wallonia that have as a primary function the protection of vulnerable soils, slopes and water bodies are subject to particular protection measures (Circulaire 2556 of 14 April 1995; and Circulaire 2619 of 22 Sept. 1997 'relative aux aménagements dans les bois soumis au régime forestier').

No articles or statements were found, indicating that forest management practices could be contributing to flooding or erosion in Belgium. Harvesting operations are small scale and the share of resistant mixed, multilayer forests is increasing. Over the last three decades, federal and regional authorities have been preparing climate change mitigation measures in forestry, resulting more resistant and resilient forests.

HCV 5 – Community needs: Sites and resources fundamental for satisfying the basic necessities of local communities or indigenous peoples (for livelihoods, health, nutrition, water, etc.), identified through engagement with these communities or indigenous peoples.

In Belgium there are no local communities or indigenous people, who rely directly on forests to meet basic subsistence needs such as food, fuelwood, shelter, or traditional medicine (see 2.1.1).

HCV 6 – Cultural values: sites, resources, habitats, and landscapes of global or national cultural, archaeological, or historical significance, and/or of critical cultural, ecological, economic, or religious/sacred importance for the traditional cultures of local communities or indigenous peoples, identified through engagement with these local communities or Indigenous Peoples.

In Belgium, the management and protection of HCV6 sites are handled by regional commissions and heritage agencies. In Flanders, the Royal Commission for Monuments and Sites (KCML-Flanders) operates within the Flanders Heritage Agency (Agentschap Onroerend Erfgoed). In the Brussels-

	<p>Capital Region, KCML Brussels oversees similar functions under the regional heritage framework. In Wallonia, the Royal Commission for Monuments, Sites and Excavations (CRMSF Wallonia) works alongside the Agence Wallonne du Patrimoine (AWaP). Each region applies its own legal framework to protect and manage culturally significant areas.</p> <p>Internet research revealed that the Flanders and Brussels Heritage Agencies have not been the subject of notable criticism and are actively engaged in heritage promotion, including educational initiatives. However, the Agence Wallonne du Patrimoine (AWaP) has reportedly been mentioned in discussions regarding operational challenges, including resource limitations and legal constraints.</p> <p><b>Trees Outside Forests (TOF) – Landscape Feedstock (only)</b></p> <p>While in Belgium not all landscapes are consistently inventoried or evaluated through a unified HCV-specific system, threat and impact evaluations are to some extent embedded in regional permitting and planning procedures. Protected zones, species lists, and Natura 2000 frameworks ensure that ecological values and risks to biodiversity are considered during interventions, especially when mapped environmental features or sensitive areas are involved.</p> <p>Permit assessments under the Decreet Natuurbehoud (Flanders), CoDT (Wallonia), and Ordonnantie Natuurbehoud (Brussels) often include ecological evaluations, particularly when landscapes are located in or near designated protected zones, mapped “small landscape elements”, Natura 2000 sites, or known habitats of protected species.</p> <p>Environmental impact assessments (EIAs) are required for certain land-use changes or infrastructure works that may affect sensitive landscapes. These processes examine likely effects on species, habitats, and broader ecosystem services.</p> <p>Natura 2000 site assessments include evaluations of threats and pressures to Annex I habitats and Annex II species, some of which may be associated with landscape trees (with, for example, birds, bats, saproxylic beetles).</p> <p>Each region maintains official Red Lists which identify species of conservation concern. These lists are supported by species-specific action plans (for example for the hazel dormouse, lesser horseshoe bat, and certain orchid species) that include habitat requirements, distribution data, known threats, and recommended conservation measures. When permit applications for interventions involving landscape operation are assessed, these documents are used to evaluate potential impacts on listed species and to determine whether mitigation or refusal is warranted. In general, inspectors of regional (and lower) authorities cover landscapes in search of ecological values and protected species.</p>
<b>Risk Rating</b>	Specified Risk

Belgium  
European area

Indicator

2.1.3	Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.
Supply Base Verifiers	<ul style="list-style-type: none"> <li>• Legislation and regulations, authorities and law-enforcement</li> <li>• Critical publications and opinions</li> </ul> <p>Applicable laws, regulations and policy frameworks</p> <p>Forest Act (Bosdecreet) 1990 – Flanders  <a href="https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1003183¶m=informatie">https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1003183¶m=informatie</a></p> <p>Forest Code 2008 and Environmental Code 2004 – Wallonia  <a href="http://iprfw.spw.wallonie.be/docs/Publication_Inventaire-forestier-wallon.pdf">http://iprfw.spw.wallonie.be/docs/Publication_Inventaire-forestier-wallon.pdf</a></p> <p>Nature Conservation Ordinance 2012 – Brussels  <a href="http://geonode.geobru.irisnet.be/fr/maps/zones-naturelles-protegees/71/">http://geonode.geobru.irisnet.be/fr/maps/zones-naturelles-protegees/71/</a></p> <p>Species Decree (Soortenbesluit) 2009 – Flanders  <a href="https://www.natuurenbos.be/sites/default/files/inserted-files/brochure_wegwijs_in_het_natuurbeheerplan.pdf">https://www.natuurenbos.be/sites/default/files/inserted-files/brochure_wegwijs_in_het_natuurbeheerplan.pdf</a></p> <p>Walloon Code of Nature (Code wallon de la nature)  <a href="https://www.fao.org/3/cb0120fr/cb0120fr.pdf">https://www.fao.org/3/cb0120fr/cb0120fr.pdf</a></p> <p>CBD implementation documents – Belgium  <a href="http://www.biodiv.be/implementation/docs/books/bib">http://www.biodiv.be/implementation/docs/books/bib</a></p> <p>EU Biodiversity overview – Belgium  <a href="https://biodiversity.europa.eu/countries/belgium">https://biodiversity.europa.eu/countries/belgium</a></p> <p>Institutional roles and oversight functions (incl. law enforcement)</p> <p>Agency for Nature and Forests (ANB) – Flanders  <a href="https://www.natuurenbos.be/over-ons/publicaties">https://www.natuurenbos.be/over-ons/publicaties</a></p> <p>Département de la Nature et des Forêts (DNF) – Wallonia  <a href="http://iprfw.spw.wallonie.be/docs/Publication_Inventaire-forestier-wallon.pdf">http://iprfw.spw.wallonie.be/docs/Publication_Inventaire-forestier-wallon.pdf</a></p> <p>Bruxelles Environnement – Brussels  <a href="http://geonode.geobru.irisnet.be/fr/maps/zones-naturelles-protegees/71/">http://geonode.geobru.irisnet.be/fr/maps/zones-naturelles-protegees/71/</a></p> <p>Belgian CBD National Focal Point – Royal Belgian Institute of Natural Sciences  <a href="http://www.biodiv.be/">http://www.biodiv.be/</a></p> <p>Analysis of practical performance by minimum and typical actors</p> <p>Forest management plans and procedures – Flanders  <a href="https://www.natuurenbos.be/sites/default/files/inserted-files/brochure_wegwijs_in_het_natuurbeheerplan.pdf">https://www.natuurenbos.be/sites/default/files/inserted-files/brochure_wegwijs_in_het_natuurbeheerplan.pdf</a></p> <p>Forest inventory – Wallonia  <a href="http://iprfw.spw.wallonie.be/docs/Publication_Inventaire-forestier-wallon.pdf">http://iprfw.spw.wallonie.be/docs/Publication_Inventaire-forestier-wallon.pdf</a></p> <p>Geopunt – Land zoning and forest cover reference (Flanders)  <a href="http://www.geopunt.be/">http://www.geopunt.be/</a></p> <p>GeoBru – Protected area zoning (Brussels)  <a href="http://geonode.geobru.irisnet.be/fr/maps/zones-naturelles-protegees/71/">http://geonode.geobru.irisnet.be/fr/maps/zones-naturelles-protegees/71/</a></p> <p>Critical review based on secondary sources</p> <p>CBD national reports – Belgium  <a href="https://www.cbd.int/reports/">https://www.cbd.int/reports/</a></p>



	<p>CBD country page – Belgium  <a href="https://www.cbd.int/countries/?country=be">https://www.cbd.int/countries/?country=be</a>  FSC NRA Belgium  <a href="https://connect.fsc.org/document-centre/documents/resource/397">https://connect.fsc.org/document-centre/documents/resource/397</a>  FAO country profile  <a href="https://www.fao.org/3/cb0120fr/cb0120fr.pdf">https://www.fao.org/3/cb0120fr/cb0120fr.pdf</a>  EU Biodiversity Platform – Belgium overview  <a href="https://biodiversity.europa.eu/countries/belgium">https://biodiversity.europa.eu/countries/belgium</a>  Peer-reviewed study on biodiversity implementation in Belgian forests  <a href="https://www.frontiersin.org/journals/forests-and-global-change/articles/10.3389/ffgc.2024.1236203">https://www.frontiersin.org/journals/forests-and-global-change/articles/10.3389/ffgc.2024.1236203</a>  Organic carbon and biodiversity mapping – ResearchGate (Belgium)  <a href="https://www.researchgate.net/figure/Spatial-distribution-of-BOC-stock-kg-C-m-2-in-Belgian-forests-in-the-year-2000-The_fig1_43326882">https://www.researchgate.net/figure/Spatial-distribution-of-BOC-stock-kg-C-m-2-in-Belgian-forests-in-the-year-2000-The_fig1_43326882</a>  OECD Environmental Performance Review – Belgium (2021)  <a href="https://www.oecd.org/environment/country-reviews/oecd-environmental-performance-reviews-belgium-2021-80f4d1b5-en.htm">https://www.oecd.org/environment/country-reviews/oecd-environmental-performance-reviews-belgium-2021-80f4d1b5-en.htm</a>  See also indicators 1.1.3, 2.1.1, 2.1.2, 2.2.2, 3.2.2, 3.2.3.</p>
<b>Risk Rating justification</b>	<p>See findings on the maintenance of HCV 1 and 3 under indicator 2.1.2; as well as indicators 1.1.3, 2.1.1, 2.2.2, 3.2.2, 3.2.3.</p> <p>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 is followed as a guideline for implementation. The Strategy plan takes into account 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.</p> <p>All three regional forestry acts of Belgium require forest owners to maintain forest cover on forest land.</p> <p>In Flanders, the main legal documents are: the Forest Act (Bosdecreet) of 1990 and subsequent amendments, Chapter VIII (on forest protection), article 90bis (on deforestation) and article 47 (on conversion in nature reserves); and the Nature Act (Natuurdecreet) of 1997, article 36 §3 (on exceptional deforestation in Natura 2000 areas). In Wallonia it are mainly the Forest Code of 2008, and the Environmental Code of 2004 (and their many amendments). In the Brussels-Capital Region, relevant provisions are found in the Nature Conservation Ordinance of 2012.</p> <p>The maintenance of HCVs is monitored by the responsible regional authorities: the Agency for Nature and Forest (ANB) in Flanders, the Département de la Nature et des Forêts (DNF) in Wallonia, and Bruxelles Environnement in Brussels.</p> <p>Red List species in Flanders are indirectly protected through the Species Decree (Soortenbesluit) of 2009, which implements both European and regional conservation obligations. The decree includes a list of strictly protected species and prohibits their disturbance, capture, killing, or destruction of habitats. Many Red List species are covered if they are also listed under the Habitats Directive or Birds Directive.</p>

	<p>Additionally, the Nature Decree (Natuurdecreet) allows for the designation of protected areas and the adoption of species action plans.</p> <p>In Wallonia, Red List species are primarily protected under the Walloon Code of Nature (Code wallon de la nature), which consolidates earlier legislation and includes species protection rules. Like in Flanders, species protected under EU legislation receive automatic protection, but not all Red List species are included. Site-level measures (e.g. Natura 2000, forest reserves) and voluntary management plans may enhance protection, but legal coverage of Red List species remains incomplete.</p> <p>Species protection is governed in the Brussels-Capital Region by the Ordinance on Nature Conservation (Ordonnantie natuurbewoud) of 2012. A regional list of protected species exists, aligned partly with EU obligations. Protection of Red List species depends on their inclusion in these lists.</p> <p>Habitat protection measures, including the management of Natura 2000 sites and green spaces, contribute to conserving some Red List species, but gaps remain, especially for non-EU-listed taxa.</p> <p>A legal framework applies to both public and private forests. On private land, the maintenance of HCV 1 (forests with significant concentrations of biodiversity) and HCV 3 (rare or threatened ecosystems) is regulated through Natura 2000 designations, species protection legislation, site-specific forest or nature management plans, and environmental permits. Activities that may impact these values generally require prior approval from the competent regional authority.</p> <p>In Wallonia, many private forest owners are not required to have an approved forest management plan or to obtain permits for harvesting operations, which may put the conservation of HCVs under pressure; however, on private land outside the designated forest zone (as defined in the sector plan), an urban planning permit may still be required from municipal authorities, depending on factors such as the surface area to be cleared, the type of vegetation, and the intended post-harvest land use.</p> <p>Since key species, habitats, ecosystems, and areas of high conservation value (HCV) may emerge over varying timescales in new locations, pre-harvest assessments are essential to ensure their identification, conservation, and protection.</p> <p><b>Trees Outside Forests (TOF) – Landscape Feedstock (only)</b></p> <p>As described under indicator 2.1.2, the identification and protection of HCVs are embedded in biodiversity, species protection, and spatial planning laws. Most principles extend beyond forests to landscapes, where region-specific permit systems and planning codes regulate activities such as selective cuttings and pruning. Conservation of biodiversity and HCVs is addressed through instruments including regional Red Lists, Natura 2000 designations, and species-specific protection laws. While this framework allows for the consideration of key species, habitats, ecosystems, and HCVs in the landscape context, the applicability and depth of such assessments vary per case.</p>
<b>Risk Rating</b>	Specified Risk

Belgium European area	Indicator
2.2.1	Feedstock shall not be sourced from land that had one of the following statuses in January 2008 and no longer has that status due to land conversion: a. Forests b. Wetlands c. Peatlands d. Highly biodiverse grasslands.
Supply Base Verifiers	<ul style="list-style-type: none"> <li>• Legislation and regulations, authorities and law-enforcement</li> <li>• Critical publications and opinions</li> </ul> <p>Applicable laws, regulations and policy frameworks  Forest Act (Bosdecreet) 1990, Flanders  <a href="https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1003183¶m=informatie">https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1003183¶m=informatie</a>  Code Forestier 2008, Wallonia  <a href="https://environnement.wallonie.be/home/legislation/nature-et-forets.html">https://environnement.wallonie.be/home/legislation/nature-et-forets.html</a>  EU Nature Restoration Law (2024/1342)  <a href="https://www.europarl.europa.eu/news/en/press-room/20240223IPR18078/nature-restoration-parliament-adopts-law-to-restore-20-of-eu-s-land-and-sea">https://www.europarl.europa.eu/news/en/press-room/20240223IPR18078/nature-restoration-parliament-adopts-law-to-restore-20-of-eu-s-land-and-sea</a>  <a href="https://www.europeanmovement.ie/the-eu-nature-restoration-law-explained">https://www.europeanmovement.ie/the-eu-nature-restoration-law-explained</a>  Natura 2000 Prioritised Action Frameworks (P.A.F.)  <a href="https://www.lifeb4b.be">https://www.lifeb4b.be</a></p> <p>Institutional roles and oversight functions (incl. law enforcement)  Agentschap voor Natuur en Bos (Flanders)  <a href="https://www.natuurenbos.be/over-het-anb/strategische-doelstellingen">https://www.natuurenbos.be/over-het-anb/strategische-doelstellingen</a>  Département de la Nature et des Forêts (Wallonia)  <a href="https://environnement.wallonie.be/home/legislation/nature-et-forets.html">https://environnement.wallonie.be/home/legislation/nature-et-forets.html</a>  LIFE Nardus project (grassland management in Wallonia)  <a href="https://www.natuurpunt.be/projecten/life-nardus-limosa-english">https://www.natuurpunt.be/projecten/life-nardus-limosa-english</a></p> <p>Analysis of practical performance by minimum and typical actors  Forest inventory results – Flanders  <a href="https://www.natuurenbos.be/beleid-wetgeving/natuurbeheer/bosinventaris/resultaten#karakteristieken-bosareaal">https://www.natuurenbos.be/beleid-wetgeving/natuurbeheer/bosinventaris/resultaten#karakteristieken-bosareaal</a>  <a href="https://www.natuurenbos.be/dossiers/bosinventaris#toc-resultaten">https://www.natuurenbos.be/dossiers/bosinventaris#toc-resultaten</a>  <a href="https://www.natuurenbos.be/vlaamse-bosinventaris/Website_BosAreaal.html">https://www.natuurenbos.be/vlaamse-bosinventaris/Website_BosAreaal.html</a>  Forest inventory tool – Wallonia  <a href="https://appliprfw.gembloux.ulg.ac.be/">https://appliprfw.gembloux.ulg.ac.be/</a>  Annual Report – ANB (Flanders)  <a href="https://www.vlaanderen.be/publicaties/jaarrapport-agentschap-voor-natuur-en-bos">https://www.vlaanderen.be/publicaties/jaarrapport-agentschap-voor-natuur-en-bos</a>  Peatland restoration overview (EUKI / REWET)  <a href="https://www.euki.de/wp-content/uploads/2025/01/Peatland-Restoration.pdf">https://www.euki.de/wp-content/uploads/2025/01/Peatland-Restoration.pdf</a>  Historical wet grassland LIFE project  <a href="https://webgate.ec.europa.eu/life/publicWebsite/project/LIFE97-NAT-B-004206/protection%20of-the-habitats-of-a-number-of-priority-species-of-wet-grasslands-in-belgium">https://webgate.ec.europa.eu/life/publicWebsite/project/LIFE97-NAT-B-004206/protection%20of-the-habitats-of-a-number-of-priority-species-of-wet-grasslands-in-belgium</a>  EU Grassland Watch (satellite monitoring)</p>

	<p><a href="https://environment.ec.europa.eu/events/eu-grassland-watch-launch-event-brussels-hybrid-2023-09-12_en">https://environment.ec.europa.eu/events/eu-grassland-watch-launch-event-brussels-hybrid-2023-09-12_en</a></p> <p>Critical review based on secondary sources          Belgian Biodiversity Platform Highlights Report 2022  <a href="https://www.vlaanderen.be/inbo/en-GB/publications/belgian-biodiversity-platform-highlights-report-2022">https://www.vlaanderen.be/inbo/en-GB/publications/belgian-biodiversity-platform-highlights-report-2022</a>          Belgian Biodiversity Platform Highlights Report 2023  <a href="https://pureportal.inbo.be/en/publications/belgian-biodiversity-platform-highlights-report-2023-belgian-biodiversity-report-2020-(Flanders)">https://pureportal.inbo.be/en/publications/belgian-biodiversity-platform-highlights-report-2023-belgian-biodiversity-report-2020-(Flanders)</a>          Nature Report 2020 (Flanders)  <a href="https://purews.inbo.be/ws/portalfiles/porta/33987067/NatureReport_2020_Final.pdf">https://purews.inbo.be/ws/portalfiles/porta/33987067/NatureReport_2020_Final.pdf</a>          National Climate Adaptation Plan (Belgium)  <a href="https://climat.be/doc/NAP_EN.pdf">https://climat.be/doc/NAP_EN.pdf</a>          Forest and peatland trends – Climate Change Post  <a href="https://www.climatechange.org.uk/belgium/forestry-and-peatlands/">https://www.climatechange.org.uk/belgium/forestry-and-peatlands/</a>          Journalistic review on stagnant forest growth  <a href="https://www.mo.be/nieuws/vlaamse-bossen-geen-vierkante-meter-erbij-sinds-2000">https://www.mo.be/nieuws/vlaamse-bossen-geen-vierkante-meter-erbij-sinds-2000</a>          Forest dashboard  <a href="https://www.bosteller.be/">https://www.bosteller.be/</a>          See also indicators 1.1.1, 1.1.4, and 2.2.3.</p>
<b>Risk Rating justification</b>	<p>See also indicators 1.1.1, 1.1.4, and 2.2.3. on main aspects related to land use, federal and regional legislation, and law-enforcement.</p> <p>Since 2008, Belgium has seen a steady increase in mixed forests and stronger legal protection under regional forest codes. Restoration of peatlands and highly biodiverse grasslands is actively progressing through EU-backed projects like LIFE B4B, with monitoring supported by satellite tools and national inventories, ensuring compliance with EU Nature Restoration targets.</p> <p>Forest conversion</p> <p>Conversion from (semi-)naturally managed forest to forest plantations or woodland monocultures (such as poplar) can occur, but this is not common in Belgium. The general trend is the opposite, and existing regulations discourage such practices.</p> <ul style="list-style-type: none"> <li>- According to the forest inventory of Wallonia and many subsequent articles, the share of broadleaved trees is increasing, mainly due to a rapid decline of homogenous spruce stands. The areas of different kinds of mixed forests increased significantly.</li> <li>- According to the forest inventory of Flanders, the share of homogenous pine stands decreased from 30.3% to 21.6% in approximately three decades. The share of mixed forests with native tree species increased from 10.4% to 17.8%.</li> </ul> <p>All three regional forestry acts require that forest owners maintain forest cover on forest land. In Flanders the main legal documents are: the Forest Act (Bosdecreet) of 1990 and subsequent amendments, Chapter VIII (on</p>

forest protection), article 90bis (on deforestation) and article 47 (on conversion in nature reserves); and the Nature Act (Natuurdecreet) of 1997, article 36 §3 (on exceptional deforestation in Natura 2000 areas). In Wallonia it are mainly the Forest Code of 2008, and the Environmental Code of 2004 (and their many amendments).

In Flanders deforestation is prohibited (Forest Act 1990), except in particular cases described in the Forest Decree. An 'urbanise permit', or an 'allotment permit' for forested land can only be granted if approved compensation measures are taken. The regional forest administration carries out the verification of compensation measures. If the forest administration observes that the planting of trees did not succeed, it can carry out the re-/afforestation in the place of the owner. Compensation measures are also needed when small groups of trees are harvested.

The politicians raising concerns are of the opinion that harvesting permits are given too easily in Flanders. The 2020 annual report of the Agency of Nature and Forest of Flanders, however, indicates that for the first time in 5 years there is no deficit in forest compensation: more forest had been compensated than had been converted. In Flandres there is the ambition to add 10.000 ha of forest between 2019 and 2030, currently (2025) they realised 2.128 ha new forest and 717 hectares of compensation forest.

Between 2008 and 2022, total forest area increased in Belgium with 0,58%. In comparison with 2000, it increased 3,30% (FAOstat). This increase was mainly realised in Wallonia. Regarding conversion of forests or plantations to non-forest land use, in Wallonia an 'urbanise permit' is required for all harvesting activities in 'agricultural zones' or 'green zones' as defined in the spatial plan ('plan de secteur'). While 'legal conversion' of forest to non-forest land use is still possible, it is subject to strict procedures and Stakeholder consultation.

The forest area in the Brussels area is very small (17 km<sup>2</sup>) and stayed unchanged.

Belgium is densely populated and the corruption level in Belgium is low, illegal conversion of forests has a high probability to be reported. Moreover, the procedure for granting permission for conversion is transparent (includes stakeholder consultation).

#### Wetlands and Peatlands

The EU Nature Restoration Law requires Belgium to restore 30% of its drained peatlands by 2030 and 50% by 2050. At least 25% must be rewetted by 2030, rising to 33% by 2050. Rewetting is voluntary for farmers and landowners. Belgium must scale up current efforts, especially in Flanders and Wallonia, and submit a national restoration plan by 2026 to meet these binding targets.

Belgium has no national law yet to implement the EU Nature Restoration Law but takes action regionally. Flanders supports wetland and peatland recovery through the Blue Deal and Nature Restoration Programme. Wallonia uses regional plans and EU-funded projects, while Brussels includes wetlands in its green space strategy. Legal updates will likely follow before 2026 to meet EU obligations.



Since 2008, Belgium has prioritised the restoration of wetlands and peatlands. Projects such as LIFE Multi Peat aim to rewet degraded peatlands, reducing greenhouse gas emissions and supporting biodiversity. In Flanders, coordinated efforts focus on hydrological restoration and expansion of peat areas at the landscape level. The Gérard & Francis Paquay Natural Reserve exemplifies these restoration efforts. Current policy and project initiatives emphasise conservation, with no significant new conversions reported during this period.

Belgium is a signatory to the Ramsar Convention, and nine sites are designated as wetlands of international importance, such as the Zwin (Flanders), Hautes Fagnes (Wallonia), and the Valley of the Haute-Sûre. Additionally, some of the areas are included in the Natura 2000 network. According to the regional Forest Acts, wetlands, peatlands and bogs are strictly protected. The majority of these areas are registered in publicly available databases, special maintenance work may be performed, under strict regulation.

#### Highly biodiverse grasslands

In Belgium, the management of highly biodiverse grasslands in forests and natural landscapes is regulated regionally. In Flanders, the Forest and Nature Decrees require both public and private forest owners to maintain biodiversity, especially in VEN and Natura 2000 areas. The Agency for Nature and Forests enforces these rules. In Wallonia, the Code Forestier and Décret Nature guide sustainable forest and landscape practices, overseen by the Department of Nature and Forests. Brussels manages its limited forests and green spaces through Brussels Environment, with a focus on urban biodiversity.

These grasslands can be officially classified as forest land under regional legislation if they lie within the forest perimeter and support forest ecosystem functions. This includes glades, rides, and open areas that benefit light-demanding species. In landscapes outside forest zones, grasslands may be protected under nature conservation rules, if recognised as valuable habitats. The current efforts align with EU directives, including the Nature Restoration Law and Habitats Directive. Belgium's Natura 2000 Prioritised Action Frameworks set out measures and funding. Enforcement is handled by regional authorities, with support provided through guidance, subsidies, and programmes such as LIFE Belgium for Biodiversity (B4B) B4B covers targeted actions for grassland recovery.

The EU Nature Restoration Law requires Belgium to restore 30% of habitats in poor condition by 2030, increasing to 60% by 2040 and 90% by 2050. This includes highly biodiverse grasslands in forests and landscapes. To meet EU targets, Belgium must submit a national restoration plan by 2026.

In 2008 (the indicator's starting point), Belgium had fewer and more fragmented highly biodiverse grasslands than most other European countries, such as France, Germany, or Romania, due to centuries of intense land-use pressure from agriculture, urbanisation, and afforestation.

Trees Outside Forests (TOF) – Landscape Feedstock (only)

	<p>In the case of landscape feedstock, the same applies as mentioned above. The risk of conversion of these land cover types is very low in Belgium.</p> <p>Comment Foronex Since 2008, the general trend has been positive, and the risk of conversion or mismanagement of such vegetation types (into lower value forests, plantations, landscapes, or other terrain) is low. However, exceptions cannot be entirely ruled out.</p> <p>Besides, our company needs to comply with the REDIII requirements. Biomass from certain land cover types is always excluded from RED compliance (old-growth forests, heathland, peatland drained after 2008), while biomass from other valuable ecosystems (high biodiversity value forests and grasslands), are eligible only if the operations demonstrably contribute to the conservation of environmental values. Although the risk of conversion is low, the general risk mitigation procedure of assessing sourcing areas also takes this aspect into account.</p>
<b>Risk Rating</b>	Low Risk

Belgium European area	Indicator
<b>2.2.2</b>	Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.
<b>Supply Base Verifiers</b>	<ul style="list-style-type: none"> <li>• Legislation and regulations, authorities and law-enforcement</li> <li>• Critical publications and opinions</li> </ul> <p>Applicable laws, regulations and policy frameworks Nature Management Plan Guide – Flanders <a href="https://natuurenbos.vlaanderen.be/sites/default/files/documenten/brochure_wegwijs_in_het_natuurbeheerplan.pdf">https://natuurenbos.vlaanderen.be/sites/default/files/documenten/brochure_wegwijs_in_het_natuurbeheerplan.pdf</a> Map of Protected Natural Sites – Brussels <a href="https://environnement.brussels/pro/outils-et-donnees/cartes/toutes-les-cartes-danalyse-nature-bruxelles#la-carte-des-sites-naturels-protoges">https://environnement.brussels/pro/outils-et-donnees/cartes/toutes-les-cartes-danalyse-nature-bruxelles#la-carte-des-sites-naturels-protoges</a> CBD National Profile – Belgium <a href="https://www.cbd.int/countries/?country=be">https://www.cbd.int/countries/?country=be</a> European Biodiversity Strategy for 2030 – FPS Public Health <a href="https://www.health.belgium.be/en/european-biodiversity-strategy-2030">https://www.health.belgium.be/en/european-biodiversity-strategy-2030</a> Update of the National Biodiversity Strategy – Biodiversity.be <a href="https://www.biodiversity.be/6035/">https://www.biodiversity.be/6035/</a></p> <p>Applicable laws, regulations and policy frameworks Agency for Nature and Forests – Flanders <a href="https://natuurenbos.vlaanderen.be">https://natuurenbos.vlaanderen.be</a> Department of Nature and Forests – Wallonia <a href="https://environnement.wallonie.be/home/legislation/nature-et-forets.html">https://environnement.wallonie.be/home/legislation/nature-et-forets.html</a> Brussels Environment – Regional Nature Management <a href="https://environnement.brussels">https://environnement.brussels</a></p>

Analysis of practical performance by minimum and typical actors  
 Return of the Lynx in Belgium – Onze Natuur  
<https://www.onzenatuur.be/artikel/eindelijk-zeker-lynx-is-terug-in-belgie>  
 Wolves in Belgium – Animal Rights  
<https://www.animalrights.be/wolven-belgi%C3%AB>  
 Biodiversity Overview – Belgium (EU)  
<https://biodiversity.europa.eu/countries/belgium>  
 Forest Information System for Europe (FISE) – European Environment Agency  
<https://www.eea.europa.eu/themes/biodiversity/forests/fise-the-forest-information-system>  
 Geopunt – Official Geodata Portal Belgium  
<http://www.geopunt.be/>

Critical review based on secondary sources  
 Belgian Biodiversity Platform  
<https://www.biodiv.be/>  
 CBD Global Reports – Convention on Biological Diversity  
<https://www.cbd.int/reports/>  
 REDII Level A Risk-Based Evaluation – Wallonia (by BiomassConsult)  
<https://energie.wallonie.be/servlet/Repository/78774.pdf?ID=78774>  
 Biodiversity 2020: Update of Belgium's National Strategy  
<https://www.cbd.int/doc/world/be/be-nbsap-v2-en.pdf>  
 Evaluating Landscape Attractiveness with Geospatial Data: A Case Study in Flanders, Belgium  
<https://www.mdpi.com/2073-445X/10/7/703>  
 The impact of urbanization on agricultural dynamics: a case study in Belgium  
<https://www.tandfonline.com/doi/full/10.1080/1747423X.2020.1769211>  
 Hedgerows as Ecosystems: Service Delivery, Management, and Restoration  
[https://www.researchgate.net/publication/343353533\\_Hedgerows\\_as\\_Ecosystems\\_Service\\_Delivery\\_Management\\_and\\_Restoration](https://www.researchgate.net/publication/343353533_Hedgerows_as_Ecosystems_Service_Delivery_Management_and_Restoration)  
 Multifunctionality in agriculture: impact of hedgerows, grass strips and extensive grassland management on crops, regulating ecosystem services and biodiversity  
<https://www.ugent.be/bw/environment/en/research/fornalab/publications/phd-laura-vanvooren.pdf>  
 The Precariousness of Walloon Peri-Urban Agricultural Lands  
<https://orbi.uliege.be/bitstream/2268/297840/1/land-12-00105.pdf>  
 Supply Base Report: Extram SRL NCR-verification audit  
<https://portal.sbp-cert.org/FileHandler.ashx?id=1ADA10B4-D572-48AD-8AA9-E0FA93CF0425>  
 Bomen snoeien en kappen – Reglementering per regio  
<https://www.bomen-snoeien-en-kappen.be/reglementering-per-regio.htm>  
 Immovlan – Understanding hedge trimming regulations in Belgium  
<https://immovlan.be/en/article/54845/understanding-hedge-trimming-regulations-in-belgium>  
 The Bulletin – Wallonia to plant 4,000 km of hedgerows and a million trees by

	<p>2024</p> <p><a href="https://www.thebulletin.be/wallonia-plant-4000km-hedgerows-and-million-trees-2024">https://www.thebulletin.be/wallonia-plant-4000km-hedgerows-and-million-trees-2024</a></p>
<b>Risk Rating justification</b>	<p>See also indicators 1.1.1, 2.1.1, 2.1.2, and 2.2.1.</p> <p>Regarding the country as a whole, Belgium performs well on this indicator. The health and vitality services of the forests towards the regional ecology are good and improving. Considering the population density of Belgium, there is an good balance between ecological, social, and economical interests in the forest sector. This balance ensures the health, vitality and other services provided by forest ecosystems can be maintained and improved.</p> <p>Key-indicator species such as the wolf and even the lynx have returned to the forests. The black woodpecker and European honey buzzard, for example, are seen very often. The federal and regional governments have timely started investigating the challenges of climate change and are promoting a shift towards more resistant and resilient forest structures. Climate change is, however, an increasing problem, and the risks of pests, flooding and erosion will need to mitigated even more. Major natural forest disturbances are seldom in Belgium, indicating health and vitality of the forests.</p> <p>The general legislation and regulations on the protection of biodiversity are sufficient, however, there are also still quite many species (certain amphibians, invertebrates, reptiles, but also several mammals) under threat. The health and the vitality of the forests also attract people to enjoy the services of the forest ecosystems. Local residents and tourists recreate in the forests, making is economically possible to keep managing the remote areas and maintaining the infrastructure, which is equally important for efficiently maintaining the forests sustainably. Especially now, when a shift to mixed multi-age and layer forests in ongoing. Small and selective forest operations are only feasible if there already is good and extensive infrastructure.</p> <p>The local population benefits from several services the forest ecosystems provide, such as clean air, water, but also noise reduction, visual barriers to industries and infrastructures, profits from the industry and recreational sector. And there are mechanisms in place that provide the possibility of Stakeholder consultation To keep maintaining and improving the forest ecosystems, a collective understanding of their importance is essential, as also a low level of corruption, and a high level of rule of law.</p> <p>Although government and non-government organisations, public policies, protected area management, the forest harvesting industry, and the recreational sector all operate in close coordination, a regulatory gap remains in Wallonia: small private forest owners are not required to have a forest management plan or to obtain a harvesting permit (see also indicator 2.2.1). However, they must still must comply with general environmental and forestry laws. In practice, the overall performance in Wallonia is positive.</p> <p>Over the past decades, forestry in Belgium has undergone a fundamental shift towards promoting resilient, ecologically functional forests. A key component of this transition has been the steady increase in the area covered by mixed forests, which has already led to measurable improvements in ecosystem services, including biodiversity conservation, water regulation, climate resilience, and recreational value. In Flanders, for example, the share</p>

of forests characterised by a diversity of tree ages has doubled over the past 30 years, now reaching approximately 70%. In Wallonia, there has also been a marked decline in monoculture stands. This structural diversification contributes to greater resistance to pests, diseases, windthrow, and extreme rainfall.

In Wallonia, the forest administration (Service public de Wallonie, SPW) has actively supported the conversion of vulnerable spruce monocultures to mixed-species stands as part of a broader climate adaptation strategy. This transition is visible in both public and private holdings, particularly in areas historically dominated by even-aged conifer plantations. It reflects the long-term application of forest planning tools, administrative controls, and incentive schemes that promote species diversification and site-appropriate reforestation.

The current legal and administrative frameworks throughout Belgium clearly prioritise the establishment of ecologically resilient, mixed forests in both new plantations and regeneration following harvesting.

In Wallonia, the replanting of tree species following harvesting or natural disturbance is governed by strict ecological suitability requirements that apply equally to private and public forests. The core legal provision is Article 40 of the Walloon Forest Code, which prohibits the planting of species that are not suited to the ecological characteristics of the site.

In practice, this means that forest owners must ensure that any regeneration, whether by planting or natural processes, respects these ecological limits. As a result, spruce monocultures, for example, are effectively excluded.

In public forests, these requirements are reinforced by additional obligations. Forest management is carried out under formally approved forest management plans, which must comply with the Forest Code and the Government of Wallonia's implementing order of 19 July 2018. These plans are subject to administrative oversight and systematically apply the species-site suitability principle.

In private forests, although owners have more operational flexibility, they are fully subject to Article 40 and the same ecological standards. For larger replanting projects, notification or authorisation may be required under Article 58 of the Forest Code, triggering a review of compliance with ecological rules.

#### Trees Outside Forests (TOF) – Landscape Feedstock (only)

Landscape management in Belgium is organised regionally, with each of the three regions addressing distinct environmental and socio-economic contexts. However, practical operational challenges can raise concerns, particularly regarding the management of hedgerows, isolated trees, and other small landscape elements.

In Flanders, despite structured cooperation between Regional Landscape Associations and private landowners to restore ecological and landscape values, intensive agriculture continues to exert pressure on landscape features. Concerns include habitat loss, reduced connectivity, and declining ecological resilience due to inadequate management of hedgerows and isolated trees.



	<p>In Wallonia, instruments exist to manage biodiversity and landscape integrity, supported by active restoration efforts. Yet operational gaps and limited regulation still allow for the clearing or mismanagement of hedgerows, small woodlands, and isolated trees, often without adequate compensation. Agricultural and urban land use may further compromise ecological functions. In the Brussels-Capital Region, the Regional Nature Plan provides a framework for green space management, guided by ecological criteria. Nevertheless, fragmented responsibilities among local authorities can result in inconsistent implementation. Reported issues include poor pruning practices, lack of systematic tree replacement, and conflicts with infrastructure or recreational use.</p> <p>Although Natura 2000 sites are designated and erosion-sensitive areas mapped, the implementation of protection and management plans, particularly on private land, remains uneven. Incomplete integration of these tools into operational decisions contributes to uncertainty.</p> <p><b>Comment Foronex</b></p> <p>Although the concerns on this topic are substantiated and some issues may still occur, they are not widespread, and our company has not found significant mismanagement in recent years.</p> <p>Over the past decade, the management of trees and landscape elements in Wallonia has become significantly stricter. While forest operations do not always require a management plan or permit, the felling of stand-alone trees, hedgerows, and small wooded elements outside forests is increasingly subject to regulation and law-enforcement. A felling permit is often required, especially in urban areas, Natura 2000 zones, or for trees over a certain size. Since 2018, hedge and tree trimming is banned between 1 April and 31 July to protect nesting birds. Enforcement has improved, supported by better access to online maps and data (e.g. Walonmap), and regional initiatives aim to restore ecological values and services by planting new hedgerows and trees. These changes reflect a broader shift toward stricter controls and biodiversity conservation in landscapes.</p> <p>Foronex applies standard precautionary measures. All sourcing operations, including those in Trees Outside Forests — landscapes, are regularly inspected. Our company maintains long-standing relationships with its harvesting teams, and the performance of any new team is thoroughly assessed before approval.</p> <p>The SBE research has drawn attention to the potential for mismanagement of landscapes. Foronex will maintain awareness and continue its standard procedure of monitoring field work in practice.</p>
<b>Risk Rating</b>	Low Risk

Belgium European area	Indicator
<b>2.2.3</b>	Soil quality in the Supply Base shall be maintained or enhanced
<b>Supply Base Verifiers</b>	<ul style="list-style-type: none"> <li>• Legislation and regulations, authorities and law-enforcement</li> </ul>

	<ul style="list-style-type: none"> <li>• Critical publications and opinions</li> </ul> <p>Legislation and regulations</p> <p>Soil Protection Legislation – Wallonia  <a href="http://environnement.wallonie.be/legis/solsoussol/sol006.htm">http://environnement.wallonie.be/legis/solsoussol/sol006.htm</a></p> <p>Soil Management Decree – Navigator (Flanders)  <a href="https://navigator.emis.vito.be/mijn-navigator?wold=304">https://navigator.emis.vito.be/mijn-navigator?wold=304</a></p> <p>Authorities and inspection agencies, law-enforcement</p> <p>Soil Portal – Belgian Soil Science Society  <a href="http://www.soilbelgium.be/">http://www.soilbelgium.be/</a></p> <p>Soil Status Database – Wallonia  <a href="https://sol.envronnement.wallonie.be/bdes.html">https://sol.envronnement.wallonie.be/bdes.html</a></p> <p>ICP Forests Manual – Forest Condition Monitoring  <a href="http://icp-forests.net/page/icp-forests-manual">http://icp-forests.net/page/icp-forests-manual</a></p> <p>Landscape Parks in Flanders – Flemish Land Agency (VLM)  <a href="https://www.vlm.be/nl/themas/platteland/landschapskwaliteit%20en%20onderhoud/landschapsparken/Paginas/default.aspx">https://www.vlm.be/nl/themas/platteland/landschapskwaliteit%20en%20onderhoud/landschapsparken/Paginas/default.aspx</a></p> <p>Flemish Government Recognises 9 New Landscape Parks  <a href="https://www.vlm.be/nl/nieuws/Pages/Vlaamse-Regering-erkent-9-Vlaamse-Parken.aspx">https://www.vlm.be/nl/nieuws/Pages/Vlaamse-Regering-erkent-9-Vlaamse-Parken.aspx</a></p> <p>Internet research into critical publications</p> <p>FAO – Soil Pollution: A Hidden Reality  <a href="https://www.fao.org/3/ca4519en/ca4519en.pdf">https://www.fao.org/3/ca4519en/ca4519en.pdf</a></p> <p>Soil Country Analyses – Belgium  <a href="http://www.soilbelgium.be/">http://www.soilbelgium.be/</a></p> <p>Novum Sub Sole – Walloon Soil Research (2024, Issue 113)</p> <p>Evaluating Landscape Attractiveness with Geospatial Data: A Case Study in Flanders  <a href="https://www.mdpi.com/2073-445X/10/7/703">https://www.mdpi.com/2073-445X/10/7/703</a></p> <p>The Precariousness of Walloon Peri-Urban Agricultural Lands  <a href="https://orbi.uliege.be/bitstream/2268/297840/1/land-12-00105.pdf">https://orbi.uliege.be/bitstream/2268/297840/1/land-12-00105.pdf</a></p> <p>Hedgerows as Ecosystems – Service Delivery, Management and Restoration  <a href="https://www.researchgate.net/publication/343353533_Hedgerows_as_Ecosystems_Service_Delivery_Management_and_Restoration">https://www.researchgate.net/publication/343353533_Hedgerows_as_Ecosystems_Service_Delivery_Management_and_Restoration</a></p> <p>Multifunctionality in Agriculture  <a href="https://www.ugent.be/bw/environment/en/research/fornalab/publications/phd-laura-vanvooren.pdf">https://www.ugent.be/bw/environment/en/research/fornalab/publications/phd-laura-vanvooren.pdf</a></p> <p>The impact of urbanization on agricultural dynamics: a case study in Belgium  <a href="https://www.tandfonline.com/doi/full/10.1080/1747423X.2020.1769211">https://www.tandfonline.com/doi/full/10.1080/1747423X.2020.1769211</a></p> <p>Biodiversity 2020: Update of Belgium's National Strategy  <a href="https://www.cbd.int/doc/world/be/be-nbsap-v2-en.pdf">https://www.cbd.int/doc/world/be/be-nbsap-v2-en.pdf</a></p> <p>Supply Base Report: Extram SRL NCR-verification audit  <a href="https://portal.sbp-cert.org/FileHandler.ashx?id=1ADA10B4-D572-48AD-8AA9-E0FA93CF0425">https://portal.sbp-cert.org/FileHandler.ashx?id=1ADA10B4-D572-48AD-8AA9-E0FA93CF0425</a></p>
<b>Risk Rating justification</b>	General restrictions to protect soils during forestry and harvesting operations

are mentioned in the forest-related legislation. Further terms and conditions for forest harvesting are specified in the sales catalogue ('houtcatalogoog' / 'cahier des charges') for sales of wood in public forests and in some (large) private forests. Elsewhere, including in private forests, environmental regulations are in effect.

Usually deep soil preparations, the construction of new permanent exploitation roads or new drainage systems, fertilization, removal of leaves and needles are all prohibited. The use of chemicals, pesticides, insecticides, herbicides are generally also forbidden.

Due to the great variation in topography, geology and landscapes, Belgium has a large variety of soil types. The dominant soil processes are essentially weathering, leaching, illuviation and podzolization. The state of soils are well studied, a the topic of soil protection, obtains sufficient attention.

The regional authorities for forestry planning and harvesting permits are the Agency for Nature and Forests in Flanders, and the Department of Nature and Forests in Wallonia. The forest and nature agencies are involved in the approval of management plans, granting of harvesting permits (and stipulating operational conditions), sales of wood from public forests, and field verification of harvesting operations and take into account the risks to soil damage and best practices on maintaining the soil quality. Environmental restrictions have to be observed, they can be related to working on vulnerable soils, seasonal restrictions, and the creation of buffer zones.

In some areas the soil needs to stay fertile, on some locations abundant nitrogen deposits (stored in biomass) can best be removed. The biomass sector plays a role in this, as it is able to market low-grade forest residues. Organic matter has risen in the Belgian forests over the past forty years. The deposition of airborne pollutants from the industrial areas is contributing to the effects of soil contamination in acid sandy soils. For decades, critical loads for eutrophying nitrogen have been exceeded in practically all terrestrial ecosystems (forests, semi-natural vegetation, etc.). The critical loads for acidifying compounds (nitrogen, sulphur) were exceeded in over half of the terrestrial ecosystems. It is therefore also important that forest management systems take into account their effect on the soil structure and its Ph-value (to prevent leaching).

In Belgium there are many protected areas. Some of these cover the most vulnerable, and ecologically valuable kind of soils, such are wetlands and marshes (Ramsar sites), and nutrient poor grounds (often protected in Natura2000 sites). The flora and fauna in such areas can be of exceptional ecological value.

Erosion prevention is a major soil issue and anti-erosion actions are being taken, such as subsidies for small scale anti-erosion works by local authorities, cross-compliance, agri-environment measures and legislation related to soil protection.

One of the main responsibilities of the Department of Nature and Forests of Wallonia is forest management that respects the quality of soils and water. In this regard, it categorised 37 thousand ha as priority areas. These cover hydromorphic soils, soils with qualities of peatland, acid peat soils, slopes, watercourses and their riparian zones, springs, water catchments, and dam

	<p>reservoirs. These forests are subject to particular protection measures (Circulaire 2556 of 14.04.1995, and Circulaire 2619 of 22.09.1997 ‘relative aux aménagements’).</p> <p>In the Belgian legislation, the term ‘soil’ includes both the solid phase and the groundwater.</p> <p>Next to forestry legislation and regulations that protect the quality of forest soils, there are also regional decrees that protect the soil in general. In Wallonia it is for example the ‘Décret relatif à la gestion et à l’assainissement des sols’ (22.03.2018) and in Flanders it is the Bodemdecreet (27.10.2006 and additions).</p> <p>Trees Outside Forests (TOF) – Landscape Feedstock (only)</p> <p>Landscape management in Belgium faces concerns over soil degradation, particularly in landscape areas that border agricultural lands or form part of semi-natural environments. Landscape elements such as hedgerows, small wooded patches, and tree lines play a crucial role in maintaining soil structure, preventing erosion, and supporting water retention. These features can be overlooked or undervalued in land-use planning. Agricultural intensification has led to the removal of landscape elements (mainly from 1950 to 1980), exposing soils to wind and water erosion, especially on sloped or unbuffered terrain. In regions like the Condroz in Wallonia, muddy floods caused by bare, compacted fields after hedge removal have led to severe sediment runoff and infrastructure damage. In parts of Flanders, the conversion of diverse field margins into larger monoculture parcels has contributed to soil loss and decreased organic matter.</p> <p>The use of heavy machinery contributes to soil compaction across landscapes, disrupting water infiltration and root development. Urbanisation is an additional pressure on landscapes. Despite regional efforts to monitor soil status, landscape-scale coordination remains weak. Soil health is often managed at the local level, without regard for the cumulative effects across larger catchments or ecological corridors. In practice, this can lead to an approach that fails to address the complexity of the interaction of landscape elements with the local environment.</p> <p>Comment Foronex</p> <p>The situation in landscape management has improved. Our company has not witnessed severe issues in recent years. This may partly be due to our long-standing cooperation with experienced harvesting teams, but our impression is that relevant requirements are more generally applied in practice.</p> <p>The SBE research has drawn attention to the potential for soil degradation from operations in landscapes. Foronex will remain attentive and continue its standard practice of monitoring field operations to ensure good practice is maintained.</p>
<b>Risk Rating</b>	Low Risk

2.2.4	Where the removal of harvest forest residues and/or stumps occurs, this shall not lead to irreversible negative impacts to the ecosystem.
Supply Base Verifiers	<ul style="list-style-type: none"> <li>• Legislation and regulations, authorities and law-enforcement</li> <li>• Critical publications and opinions</li> </ul> <p>Flemish Environmental Code – Vegetation Decree and Management Obligations  <a href="https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1003183&amp;m=informatie">https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1003183&amp;m=informatie</a></p> <p>Natura 2000 and Forests – EU Commission Management Guidelines  <a href="http://ec.europa.eu/environment/nature/natura2000/management/docs/Final%20Guide%20N2000%20%20Forests%20Part%20I-II-Annexes_de.pdf">http://ec.europa.eu/environment/nature/natura2000/management/docs/Final%20Guide%20N2000%20%20Forests%20Part%20I-II-Annexes_de.pdf</a></p> <p>VCG.AI – Forest Residues as Bioresources in Circular Bioeconomy  <a href="https://vcg.ai/forest-residues-as-bioresources-in-circular-bioeconomy/">https://vcg.ai/forest-residues-as-bioresources-in-circular-bioeconomy/</a></p> <p>Natuur en Bos – Duurzaam Bosbeheer  <a href="https://www.natuurenbos.be/beleid-wetgeving/natuurbeheer/duurzaam-bosbeheer">https://www.natuurenbos.be/beleid-wetgeving/natuurbeheer/duurzaam-bosbeheer</a></p> <p>Bosgroepen Vlaanderen – Bosbeheer en Biodiversiteit  <a href="https://www.bosgroepen.be/bosbeheer-en-biodiversiteit/">https://www.bosgroepen.be/bosbeheer-en-biodiversiteit/</a></p> <p>European Forest Institute – Forest Biomass for Energy in the EU  <a href="https://efi.int/publications-bank/forest-biomass-energy-eu-current-trends-carbon-balance-and-sustainable-harvesting">https://efi.int/publications-bank/forest-biomass-energy-eu-current-trends-carbon-balance-and-sustainable-harvesting</a></p> <p>Vlaamse Milieumaatschappij – Impact van Houtoogst op Bodem en Biodiversiteit  <a href="https://www.vmm.be/publicaties/impact-van-houtoogst-op-bodem-en-biodiversiteit">https://www.vmm.be/publicaties/impact-van-houtoogst-op-bodem-en-biodiversiteit</a></p> <p>See also indicator 2.2.3.</p>
Risk Rating justification	<p>Forest residues can be defined as all above-ground biomass left on the ground after timber harvesting operations (branches, tops, small low-grade logs and undesired undergrowth shrubs, etc), but exclude stumps, coarse roots and fine roots. Regarding coniferous forests, around 10 to 15 % of the total above ground biomass is left behind as forest residues during regular harvesting activities (20–30% in the first commercial thinning but only 4–5% in the final harvest). However, this share can vary considerably and reach up to 50% depending on the conditions. Values of around 25% of residue are usual in European broadleaved forests.</p> <p>Forest regulations often demand a part of the forest residues are left onsite for ecological reasons. Within forest certification, it can also be required the leave a certain share of biomass in the forest to protect soil fertility and biodiversity.</p> <p>In Wallonia it is common practice to remove big branches and tree tops after felling operations, either for the production of biomass feedstock, or for firewood. Leaves and twigs are left in the forest, as also some of the larger residues.</p> <p>Belgian forests have been accumulating huge amounts of organic matter for the last 40 years. For decades, maybe a century, critical deposit loads for eutrophying elements have been exceeded in practically all terrestrial</p>



ecosystems (forests, semi-natural vegetation, etc.). The critical loads for acidifying compounds have also been exceeded in over half of the terrestrial ecosystems. The excessive deposits (like nitrogen) from regional industries and human activity, have influenced the ecosystems of usual forests and high-value protected nature reserves. The (partly) removal of forest residues therefor normally does not harm the soil and biodiversity, but improves it. On the other hand, rotting forest residues create methane gasses, dry residues can catch fire, and too many weak trees and dead wood can increase the risk of a pest outbreaks.

Next to nutrient balance and biodiversity, the operations (with forestry machines) should be executed accurately, to avoid damage to ecosystems (see also indicator 2.2.5). The current forest regulations consider these aspects. These are reflected in the approved management plans and harvesting permits.

Most forests in Belgium fall under a management plan, or the harvest operations fall under a permit. Private owners in Wallonia (outside protected areas), however, do not have to have a harvesting plan, or a permit. But large private forest owners, including nature conservation organizations, will generally have them.

#### Trees Outside Forests (TOF) – Landscape Feedstock (only)

In the context of landscape management in Belgium, the removal of harvest residues and stumps must not lead to irreversible negative impacts on ecosystems. This principle is embedded in regional environmental and land-use regulations. Oversight of such activities lies primarily with the Service public de Wallonie (SPW) in Wallonia and the Agentschap voor Natuur en Bos (ANB) in Flanders. Land-use designations, including the plan de secteur in Wallonia and the spatial implementation plans in Flanders, regulate interventions on parcels, including tree and stump removal. Buffer zones along waterways and erosion-prone areas are often included in environmental zoning, but the extent to which these restrictions are visible, enforced, and integrated into local operations can vary significantly, particularly in small scale landscapes.

Decades of nitrogen and other nutrient deposition across Belgium, largely from agriculture and transport, have caused widespread nutrient oversaturation in soils, exceeding critical ecological thresholds in most terrestrial ecosystems. In this context, the partial removal of forest residues such as branches and tops is generally not ecologically harmful and may, in fact, help restore nutrient balance. Removing excess organic matter can also reduce risks of eutrophication, pest outbreaks, methane emissions, and fire hazards in unmanaged zones.

However, even where nutrient loads are high, the ecological functions of harvest residues in landscapes remain important. Retaining part of the biomass on site contributes to maintaining soil structure, controlling erosion, preserving habitat connectivity, and supporting microclimate stability, particularly in fragmented, sloped, or semi-natural areas.

Stump removal is rarely practiced in landscape contexts and only occurs when necessary for the parcel's intended land use, such as conversion for

	infrastructure development. Such operations are expensive and not conducted for biomass extraction. They fall under zoning restrictions and must be justified within the applicable land-use framework.
<b>Risk Rating</b>	Low Risk

Belgium European area	Indicator
<b>2.2.5</b>	Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.
<b>Supply Base Verifiers</b>	<ul style="list-style-type: none"> <li>• Legislation and regulations, authorities and law-enforcement</li> <li>• Critical publications and opinions</li> </ul> <p>Walloon Environmental Legislation – Nature and Forests  <a href="https://environnement.wallonie.be/home/legislation/nature-et-forets.html">https://environnement.wallonie.be/home/legislation/nature-et-forets.html</a>            EU Water and Floods Directives – Country implementation summary  <a href="https://www.cbd.int/countries/?country=ie">https://www.cbd.int/countries/?country=ie</a>            Direction Générale Agriculture, des Ressources Naturelles et de l'Environnement (DGARNE) – Wallonia  <a href="https://iucn.org/our-union/members/iucn-members/direction-generale-agriculture-des-ressources-naturelles-et-de">https://iucn.org/our-union/members/iucn-members/direction-generale-agriculture-des-ressources-naturelles-et-de</a>            Analysing and evaluating flood risk governance in Belgium  <a href="https://climate-adapt.eea.europa.eu/en/metadata/publications/analysing-and-evaluating-flood-risk-governance-in-belgium-dealing-with-flood-risks-in-an-urbanized-and-institutionally-complex-country">https://climate-adapt.eea.europa.eu/en/metadata/publications/analysing-and-evaluating-flood-risk-governance-in-belgium-dealing-with-flood-risks-in-an-urbanized-and-institutionally-complex-country</a>            Flemish flooding incidents from 2024 recognised as disasters  <a href="https://www.brusselstimes.com/1343511/flemish-flooding-incidents-from-2024-recognised-as-disasters">https://www.brusselstimes.com/1343511/flemish-flooding-incidents-from-2024-recognised-as-disasters</a>            Wallonia places 13 rivers on high flood alert  <a href="https://www.brusselstimes.com/1384965/wallonia-places-13-rivers-on-high-flood-alert">https://www.brusselstimes.com/1384965/wallonia-places-13-rivers-on-high-flood-alert</a>            FlashFloodBreaker Project – Enhancing resilience against flash floods  <a href="https://flashfloodbreaker.nweurope.eu/">https://flashfloodbreaker.nweurope.eu/</a>            How Flanders is harnessing nature to prevent deadly floods  <a href="https://www.euronews.com/green/2024/06/18/how-flanders-is-harnessing-nature-to-prevent-deadly-floods">https://www.euronews.com/green/2024/06/18/how-flanders-is-harnessing-nature-to-prevent-deadly-floods</a>            Blind spots in Belgian flood risk governance  <a href="https://cris.unu.edu/blindspotsinbelgianfloodriskgovernance">https://cris.unu.edu/blindspotsinbelgianfloodriskgovernance</a>            Flood alerts issued for rivers in Wallonia and Flanders  <a href="https://brusselsmorning.com/flood-alerts-issued-for-rivers-in-wallonia-and-flanders/65545">https://brusselsmorning.com/flood-alerts-issued-for-rivers-in-wallonia-and-flanders/65545</a>            Flood Risk Map – Walloon Region  <a href="https://www.arcgis.com/apps/View/index.html?appid=15b6c0fc0bce4bf093e7081f114278d7">https://www.arcgis.com/apps/View/index.html?appid=15b6c0fc0bce4bf093e7081f114278d7</a>            Comparing flood forecasting and early warning systems in transboundary river basins  <a href="https://egusphere.copernicus.org/preprints/2025/egusphere-2025-">https://egusphere.copernicus.org/preprints/2025/egusphere-2025-</a></p>

	<p>828/egusphere-2025-828.pdf European State of the Climate 2024 – Flooding <a href="https://climate.copernicus.eu/esotc/2024/flooding">https://climate.copernicus.eu/esotc/2024/flooding</a></p>
<p><b>Risk Rating justification</b></p>	<p>In Belgium, the protection of ground water, surface water, and downstream water flows is embedded in both national and regional legal frameworks, and closely tied to EU directives and international cooperation. The EU Water Framework Directive (2000/60/EC) and the EU Floods Directive (2007/60/EC) have been transposed into regional laws and form the legal basis for water protection, including in forested areas. Regional authorities—namely the Agentschap voor Natuur en Bos (ANB) in Flanders, the Département de la Nature et des Forêts (DNF) in Wallonia, and Bruxelles Environnement—are responsible for the approval and enforcement of forest management plans and harvesting permits, ensuring that forest operations do not deteriorate the natural condition of soil and water systems.</p> <p>Belgium also cooperates internationally through river basin commissions to manage water quality and flood risks in shared catchments. This includes active participation in the International Commission for the Meuse (ICM) and the International Commission for the Moselle and the Saar (ICPMS). These structures enable cross-border coordination with France, Germany, Luxembourg, and the Netherlands. Shared early warning systems and flood risk management plans are in place and updated every six years in line with EU law.</p> <p>While Belgian forest regulations do not formally classify forests by functions such as flood protection or erosion control, such aspects are effectively covered through general forestry law. The issuance of felling licences and management plans is subject to environmental safeguards, including minimising erosion, runoff, and flood risks—particularly in hilly terrain or valley zones. Regional forest agencies evaluate ecological sensitivity before approving any operations, and in public forests they themselves implement management measures in line with legal obligations.</p> <p>In Wallonia, the DNF has identified around 37,000 hectares of public forest as priority zones for the protection of sensitive soils and water resources. These areas include hydromorphic soils, peatlands, steep slopes, riparian zones, springs, water catchments, and dam basins, and are subject to specific conservation measures.</p> <p>Belgium also implements EU directives on drinking water, and water catchment protection is integrated into regional policy frameworks. Restrictions on pesticide and fertiliser use in or near forests contribute to the protection of water quality.</p> <p>There is no indication in national or international literature that forest management contributes negatively to the quality of drinking water in Belgium. Compliance with environmental regulations is standard practice for both public and private forest owners and operators. The recent impacts of climate change, including episodes of flash flooding, have led Belgian authorities to adopt more climate-resilient forestry strategies. Forests are increasingly managed not only for biodiversity and timber, but also for their water retention and buffering capacities, with future plans expected to further integrate flood prevention into forest policy.</p>

	<p>Trees Outside Forests (TOF) – Landscape Feedstock (only)</p> <p>The legal and administrative framework for water protection in Belgium applies equally to landscape elements, urban parks, and other managed green spaces. These frameworks are based on the EU Water Framework Directive (2000/60/EC) and the EU Floods Directive (2007/60/EC), both of which have been transposed into regional legislation.</p> <p>Oversight is provided by the regional authorities responsible for environmental and forest management, alongside local municipal administrations.</p> <p>In urban and peri-urban landscapes, water management is primarily oriented toward stormwater control and drought mitigation. Commonly applied measures include retention basins, infiltration zones, and vegetated stormwater buffers. In Wallonia, temporary immersion basins have been implemented to reduce flood risk and improve surface water regulation in flood-prone areas. Flanders has similarly adopted natural water retention strategies and climate-adaptive spatial planning tools, as outlined in its flood risk management plans.</p> <p>Water catchment protection is also integrated into regional planning frameworks. Measures such as limiting impervious surfaces, preserving riparian vegetation, and promoting groundwater infiltration contribute to the protection of drinking water resources and the overall resilience of landscape ecosystems. These actions are supported by land zoning instruments, conservation regulations, and urban development codes, which help ensure that ecological function is maintained.</p> <p>Nature-based solutions, including floodable parks, urban wetlands, and vegetated corridors, are increasingly incorporated into land-use strategies. These contribute to reduced runoff, enhanced water retention, and improved ecological connectivity, supporting both climate resilience and biodiversity.</p>
<b>Risk Rating</b>	Low Risk

Belgium European area	Indicator
<b>2.2.6</b>	Air emissions shall comply with national legislation or in the absence of national legislation with industry best practice.
<b>Supply Base Verifiers</b>	<ul style="list-style-type: none"> <li>• Legislation and regulations, authorities and law-enforcement</li> <li>• Critical publications and opinions</li> </ul> <p>Legislation and regulations  EU Air Quality – Overview of Policies  <a href="https://environment.ec.europa.eu/topics/air/air-quality_en">https://environment.ec.europa.eu/topics/air/air-quality_en</a>  EU Air Quality Standards – Legal Framework Summary  <a href="https://environment.ec.europa.eu/topics/air/air-quality/eu-air-quality-standards_en">https://environment.ec.europa.eu/topics/air/air-quality/eu-air-quality-standards_en</a>  Directive 2008/50/EC on Ambient Air Quality and Cleaner Air for Europe  <a href="https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32008L0050">https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32008L0050</a></p>

	<p>Directive 2004/107/EC on Arsenic, Cadmium, Mercury, Nickel and PAHs in Ambient Air  <a href="https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32004L0107">https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32004L0107</a></p> <p>Directive 2015/1480/EU on Sampling, Analysis and Reporting of Ambient Air Quality  <a href="https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32015L1480">https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32015L1480</a></p> <p>Commission Decision 2011/850/EU – E-Reporting and Data Quality  <a href="https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1529998035942&amp;uri=CELEX:32011D0850">https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1529998035942&amp;uri=CELEX:32011D0850</a></p> <p>Regulation (EU) 2016/1628 – Emission Limits for Non-Road Mobile Machinery  <a href="https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32016R1628">https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32016R1628</a></p> <p>Authorities and inspection agencies, law-enforcement          Federal Public Service Health – Air &amp; Environment  <a href="https://www.health.belgium.be/en/environment/air">https://www.health.belgium.be/en/environment/air</a></p> <p>E-Reporting Country Monitoring – Air Quality Portal (EEA)  <a href="https://eeadmz1-cws-wp-air02.azurewebsites.net/index.php/reporters-corner/e2a-data-monitor-country-and-stations/">https://eeadmz1-cws-wp-air02.azurewebsites.net/index.php/reporters-corner/e2a-data-monitor-country-and-stations/</a></p> <p>Internet research into critical publications          IQAir – Belgium Air Quality Rankings and PM2.5 Data  <a href="https://www.iqair.com/belgium">https://www.iqair.com/belgium</a></p> <p>EEA – Belgium Air Pollution Country Fact Sheet 2024  <a href="https://www.eea.europa.eu/en/topics/in-depth/air-pollution/air-pollution-country-fact-sheets-2024/belgium-air-pollution-country-fact-sheet-2024">https://www.eea.europa.eu/en/topics/in-depth/air-pollution/air-pollution-country-fact-sheets-2024/belgium-air-pollution-country-fact-sheet-2024</a></p> <p>AirClim – Belgium Must Act to Limit PM Pollution  <a href="https://www.airclim.org/acidnews/belgium-must-act-limit-pm-pollution">https://www.airclim.org/acidnews/belgium-must-act-limit-pm-pollution</a></p> <p>ClientEarth – Belgians Sue Government Over Air Pollution  <a href="https://www.clientearth.org/latest/press-office/press-releases/belgians-follow-german-citizens-sue-government-over-air-pollution-human-rights-issues/">https://www.clientearth.org/latest/press-office/press-releases/belgians-follow-german-citizens-sue-government-over-air-pollution-human-rights-issues/</a></p>
<b>Risk Rating justification</b>	<p>Belgium's air emissions from forestry are regulated under a comprehensive legal framework that transposes the EU Ambient Air Quality Directive (2008/50/EC), the National Emission Ceilings Directive (2016/2284/EU), and the Regulation on Non-Road Mobile Machinery (EU 2016/1628). These provisions are implemented at the regional level: in Flanders through VLAREM II, in Wallonia through the Executive Order of 11 April 2019, and in the Brussels-Capital Region via the Executive Order of 17 January 2019 and the Ordinance of 19 March 2020. The competent authorities are the Agentschap voor Natuur en Bos (ANB) in Flanders, the Département de la Nature et des Forêts (DNF) in Wallonia, and Brussels Environment (IBGE-BIM) in the capital region, with coordination at federal level provided by the Federal Public Service Health, Food Chain Safety and Environment.</p> <p>Internet research did not find publications, articles or complaints on significant adverse effects on air quality or pollution from forest management activities in Belgium. Forest operations are generally small in scale and mechanised using equipment that is subject to the EU regulation on non-road mobile machinery emissions. Tractors, harvesters, and other machinery used in forestry must meet these requirements, ensuring that emissions remain within regulated thresholds. Practices such as prescribed burning, which contribute</p>



	<p>to air pollution in other regions, are not commonly applied in Belgium's forestry sector.</p> <p>Belgium participates in the European Air Quality e-Reporting system managed by the European Environmental Agency, and relevant data are published through the European Air Quality Portal. The most recent figures indicate that Belgium's average PM2.5 concentration in 2024 was 8.89 µg/m³, which is 1.8 times the World Health Organization's recommended limit. According to IQAir, this places Belgium 105th globally for PM2.5 exposure, within the moderate range by international comparison. The European Environment Agency's 2024 factsheet on Belgium notes that while national progress has been made, air pollution in urban centres remains a concern, particularly due to exceedances in nitrogen dioxide and fine particulate matter. These issues, however, are linked primarily to urban transport and residential heating, not to forest operations.</p> <p>There is no indication from national or international sources that the Belgian forestry sector contributes significantly to air quality degradation. Current practices comply with EU legal requirements and standards.</p> <p>Trees Outside Forests (TOF) – Landscape Feedstock (only)</p> <p>For landscape feedstock the same applies as above.</p>
<b>Risk Rating</b>	Low Risk

Belgium European area	Indicator
<b>2.2.7</b>	Pesticides shall only be used as part of an Integrated Pest Management (IPM) plan in compliance with national legislation, chemical safety data sheets and industry best practice. Banned pesticides shall not be used.
<b>Supply Base Verifiers</b>	<ul style="list-style-type: none"> <li>• Legislation and regulations, authorities and law-enforcement</li> <li>• Critical publications and opinions</li> </ul> <p>Directive 2009/128/EC on the sustainable use of pesticides  <a href="https://eurlex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:309:0071:0086:en:PDF">https://eurlex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:309:0071:0086:en:PDF</a></p> <p>NAPAN – Nationaal Actie Plan d'Action National  <a href="https://fytowebe.be/nl/reductieplan/nationaal-actie-plan-daction-national-napan">https://fytowebe.be/nl/reductieplan/nationaal-actie-plan-daction-national-napan</a></p> <p>Public consultation on the 2018–2022 NAPAN programme  <a href="https://fytowebe.be/nl/reductieplan/overleg/napan/openbaar-onderzoek-over-het-programma-2018-2022-van-het-nationaal">https://fytowebe.be/nl/reductieplan/overleg/napan/openbaar-onderzoek-over-het-programma-2018-2022-van-het-nationaal</a></p> <p>Belgium's National Action Plan – Notification to the EU  <a href="https://food.ec.europa.eu/system/files/2019-03/pesticides_sup_nap_bel_en.pdf">https://food.ec.europa.eu/system/files/2019-03/pesticides_sup_nap_bel_en.pdf</a></p> <p>Royal Decree of 28 February 1994 on crop protection products  <a href="https://fytowebe.be/nl/wetgeving/gewasbescherming/koninklijk-besluit-van-28-februari-1994">https://fytowebe.be/nl/wetgeving/gewasbescherming/koninklijk-besluit-van-28-februari-1994</a></p> <p>Professional pest control sector Belgium  <a href="http://www.belgianpestcontrol.be/">http://www.belgianpestcontrol.be/</a></p>
<b>Risk Rating justification</b>	The use of pesticides in Belgium is regulated under both EU and national

	<p>legislation, with Directive 2009/128/EC forming the basis for national implementation through the NAPAN (Nationaal Actie Plan d'Action National) framework. This programme, coordinated by the three regional governments, aims to promote Integrated Pest Management (IPM) and reduce pesticide dependency across all sectors. Within the scope of forestry and landscape management, NAPAN has introduced strict controls that effectively prohibit the use of pesticides, herbicides, fungicides, and insecticides in and around forests, nature reserves, woodlands, and other sensitive or publicly accessible areas such as parks, water catchments, verges, and the banks of watercourses. These restrictions are reinforced by additional measures that prohibit pesticide application on road edges and verges adjacent to motorways, railways, and waterways, as well as in valleys, source areas, and locations visited by vulnerable groups.</p> <p>Exceptions to the general prohibition are limited to methodical and combined mechanical-chemical treatments, and only in cases of acute and unforeseeable pest threats that pose serious risks to human health, the environment, or safety, where no effective alternatives exist. In such cases, temporary derogations may be granted, provided the competent administration is notified in advance. These authorities include the Flanders Environment Agency (VMM) and the Department of Environment and Spatial Development in Flanders, the Département de la Nature et des Forêts (DNF) in Wallonia, and Bruxelles Environnement in the Brussels-Capital Region. Each regional authority is responsible for implementing and enforcing the legal framework within its territory, overseeing pesticide approvals, maintaining compliance checks, and reviewing any derogation requests.</p> <p>NAPAN, now in its third cycle (2013–2017; 2017–2022; 2023–2027), was also the driving force behind the 2012 ban on the use and storage of pesticides in forest and nature reserves. It defines high-risk areas both as locations used by vulnerable populations and as designated protected zones, such as Natura 2000 sites and forest reserves. Although not explicitly included in the action plan, Belgium's forest diversification strategy, shifting from conifer monocultures toward mixed, native broadleaved stands, functions as a key preventive measure under IPM by reducing vulnerability to pest outbreaks. To further minimise chemical use, preventive agronomic measures such as crop rotation, variety selection, and targeted fertilisation are applied.</p> <p>Additional outcomes of NAPAN include a ban on herbicide use by non-professionals, except for basic substances, low-risk plant protection products, and biopesticides of natural origin. All pesticide use must be logged in a spraying journal by forest owners, and any product used must have a time-limited, use-specific authorisation overseen by the relevant regional agency. These combined legal, administrative, and practical measures ensure that pesticide use in Belgian forestry and landscape management is stringently controlled, in line with IPM principles and environmental protection objectives.</p>
<b>Risk Rating</b>	Low Risk

European area	
2.2.8	Waste shall be disposed of in an environmentally appropriate manner.
Supply Base Verifiers	<ul style="list-style-type: none"> <li>• Legislation and regulations, authorities and law-enforcement</li> <li>• Critical publications and opinions</li> </ul> <p>Applicable laws, regulations and policy frameworks</p> <p>Environmental enforcement framework – Federal  <a href="https://www.health.belgium.be/fr/l-inspection-federale-de-lenvironnement">https://www.health.belgium.be/fr/l-inspection-federale-de-lenvironnement</a></p> <p>Flemish waste and environmental nuisance regulation (Materials Decree context)  <a href="https://omgeving.vlaanderen.be/index.php/nl/wegwijzer/de-hinder-heeft-betrekking-op-afval">https://omgeving.vlaanderen.be/index.php/nl/wegwijzer/de-hinder-heeft-betrekking-op-afval</a></p> <p>Flemish waste sorting and collection rules for businesses  <a href="https://www.vlaanderen.be/regels-voor-sortering-en-ophaling-van-afval-bij-bedrijven">https://www.vlaanderen.be/regels-voor-sortering-en-ophaling-van-afval-bij-bedrijven</a></p> <p>Walloon Code of the Environment (including waste law and enforcement)  <a href="http://environnement.wallonie.be/legis/menucode.htm">http://environnement.wallonie.be/legis/menucode.htm</a></p> <p>Walloon decree on environmental crime (entered into force July 2022)  <a href="https://www.wallonie.be/fr/actualites/delinquance-environnementale-entree-en-vigueur-du-nouveau-decret">https://www.wallonie.be/fr/actualites/delinquance-environnementale-entree-en-vigueur-du-nouveau-decret</a></p> <p>Identification of institutional roles and oversight functions (incl. law enforcement)</p> <p>Flemish Nature Inspectorate – general mandate and competences  <a href="https://natuurenbos.vlaanderen.be/natuurinspectie">https://natuurenbos.vlaanderen.be/natuurinspectie</a>  <a href="https://natuurenbos.vlaanderen.be/natuurinspectie/wat-doet-de-natuurinspectie">https://natuurenbos.vlaanderen.be/natuurinspectie/wat-doet-de-natuurinspectie</a></p> <p>Federal Environmental Inspectorate (overview of roles)  <a href="https://www.health.belgium.be/fr/l-inspection-federale-de-lenvironnement">https://www.health.belgium.be/fr/l-inspection-federale-de-lenvironnement</a></p> <p>Walloon enforcement authorities – institutional roles defined under Code de l'Environnement  <a href="http://environnement.wallonie.be/legis/menucode.htm">http://environnement.wallonie.be/legis/menucode.htm</a></p> <p>Bruxelles Environnement-IBGE  <a href="https://be.brussels/en/about-region/structure-and-organisations/overview-administrations-and-institutions-region/bruxelles-environnement-ibge?utm_source=chatgpt.com">https://be.brussels/en/about-region/structure-and-organisations/overview-administrations-and-institutions-region/bruxelles-environnement-ibge?utm_source=chatgpt.com</a></p> <p>Analysis of practical performance by minimum and typical actors</p> <p>Walloon Forest Inventory (public forestry practices and control)  <a href="http://iprfw.spw.wallonie.be/docs/Publication_Inventaire-forestier-wallon.pdf">http://iprfw.spw.wallonie.be/docs/Publication_Inventaire-forestier-wallon.pdf</a></p> <p>Flemish environmental nuisance/waste control (applied in forestry and landscape management)  <a href="https://omgeving.vlaanderen.be/index.php/nl/wegwijzer/de-hinder-heeft-betrekking-op-afval">https://omgeving.vlaanderen.be/index.php/nl/wegwijzer/de-hinder-heeft-betrekking-op-afval</a></p> <p>Flemish Nature Inspectorate – supervision in forest and nature areas  <a href="https://natuurenbos.vlaanderen.be/natuurinspectie/wat-doet-de-natuurinspectie">https://natuurenbos.vlaanderen.be/natuurinspectie/wat-doet-de-natuurinspectie</a></p>

	<p>Critical review based on secondary sources</p> <p>Walloon decree on environmental crime (press release and policy context)  <a href="https://www.wallonie.be/fr/actualites/delinquance-environnementale-entree-en-vigueur-du-nouveau-decret">https://www.wallonie.be/fr/actualites/delinquance-environnementale-entree-en-vigueur-du-nouveau-decret</a></p> <p>Flemish Nature Inspectorate – operational summaries and monitoring practices  <a href="https://natuurenbos.vlaanderen.be/natuurinspectie">https://natuurenbos.vlaanderen.be/natuurinspectie</a></p> <p>Federal enforcement framework – contextual background and interregional coordination  <a href="https://www.health.belgium.be/fr/l-inspection-federale-de-lenvironnement">https://www.health.belgium.be/fr/l-inspection-federale-de-lenvironnement</a></p>
<b>Risk Rating justification</b>	<p>Belgium maintains a robust legal and institutional framework for ensuring that forestry-related waste is disposed of in an environmentally appropriate manner. Both legal requirements and practical monitoring mechanisms are in place, supported by recent legislative improvements. Inspection intensity and enforcement are aligned with environmental risk and area designation, contributing to the low incidence of reported violations in the forestry sector. Environmental legislation in Belgium is aligned with EU law, either through directly applicable EU regulations or via the transposition of EU directives into national and regional law. Waste disposal in forests must comply with the general provisions of environmental law and specific forestry legislation. In Flanders, enforcement of waste-related provisions is covered under the Materials Decree, which regulates the prevention, collection, reuse, recycling, and disposal of waste. This Decree works in conjunction with the Forest Decree and Nature Decree, particularly in areas under protection such as Natura 2000 sites and the Flemish Ecological Network. In Wallonia, a new decree on environmental crime entered into force on 1 July 2022, updating the legal framework for prosecuting and sanctioning environmental offences, including unauthorised dumping, pollution of soil and water, and harm to protected species or areas. Additionally, Belgian law obliges all companies, including forestry contractors, to arrange for proper disposal of residual industrial waste. If the amount of waste generated is limited and within thresholds defined for household waste, companies may use the municipal waste collection system without needing a separate contract. In Flanders, the Flemish Nature Inspectorate (Natuurinspectie) is responsible for law enforcement related to forest, nature, and environmental regulations. The inspectorate is tasked with enforcing a range of decrees, including Materials (waste), Forests, Nature, Pesticides, Manure, and Hunting decree, as well as the Flemish Spatial Planning Codex. The inspectorate places special emphasis on Natura 2000 areas, the Flemish Ecological Network, forests, nature reserves, and to a lesser extent agricultural zones. The frequency of checks increases with the level of protection granted to the area. Each inspector covers approximately 450 km<sup>2</sup>, which corresponds to about twelve municipalities. In Wallonia, a Strategy for Environmental Enforcement was adopted on 16 December 2021, followed by the new Decree on Environmental Crime (effective 1 July 2022). This legislation increases both financial and technical</p>

capacity at the regional and local levels to tackle environmental violations more effectively. The Public Service of Wallonia has hired 21 additional agents, and the new Investigation Unit for Serious Crime (replacing the former Pollution Control Unit) focuses on severe forms of environmental crime. Municipalities now receive quadruple funding to improve enforcement, and tools such as drones and surveillance cameras have been introduced. In the Brussels-Capital Region, waste management and environmental enforcement fall under the authority of Bruxelles Environnement (Leefmilieu Brussel). Although forest areas are limited (mainly the Sonian Forest, part of which lies within the region), waste disposal is strictly regulated in line with the Ordinance on Waste (1999) and EU directives. Unauthorised dumping, including in wooded or protected zones, is prohibited. Surveillance and enforcement are carried out by the environmental police and inspectors from Bruxelles Environnement, who monitor compliance in forest zones, nature reserves, and urban green spaces. As in other regions, anyone witnessing serious pollution or illegal dumping is obliged to report it. The region cooperates with neighbouring authorities (Flanders and Wallonia) for cross-boundary issues, especially within the Sonian Forest.

Forest harvesting operations in Belgium are typically conducted by trained teams led by certified managers. These teams are subject to inspections by both public district officers and private forest owners. There is no known operational or economic incentive for forestry workers to improperly dispose of waste (e.g. leaving debris or spilling used oil or lubricants on site), and good practices are reinforced through training and monitoring. All waste produced during operations—whether lubricants, packaging, or residual materials—is required to be removed from site and properly disposed of. In most cases, waste is collected and managed through agreements with certified municipal or private collectors. Illegal dumping is strictly prohibited. The Materials Decree and regional regulations require not only proper disposal, but also documentation in some cases for hazardous or industrial waste streams. Companies found in violation may be sanctioned under the environmental enforcement decrees.

A search of recent media, public reports, and enforcement databases did not result in cases of illegal or inappropriate waste disposal by forestry companies or individual workers in Belgium. Additionally, no cases emerged from academic or grey literature reviews.

Belgian law encourages public reporting of serious pollution or waste issues. Anyone discovering significant environmental harm (e.g. large waste items, oil spills, contaminated soil) is expected to alert emergency services, such as the police or fire brigade.

#### Trees Outside Forests (TOF) – Landscape and Urban Feedstock

The same legal and enforcement framework that applies to forestry also governs waste management in landscape maintenance and harvesting operations along roads, public green spaces, and urban areas. These activities fall under regional environmental laws that transpose EU waste directives and are supported by operational rules.

In Flanders, the Materials Decree governs waste prevention, collection, and

	<p>disposal and applies to all landscape-related operations, including verge and roadside maintenance. The Flemish Nature Inspectorate enforces compliance, including in urban nature zones and roadsides, with an emphasis on protected or vulnerable areas. In Wallonia, enforcement follows the 2022 Decree on Environmental Crime and the broader Strategy for Environmental Enforcement, which extend to waste violations along roadways and in municipal green infrastructure. The Brussels-Capital Region, through Bruxelles Environnement, applies the 1999 Waste Ordinance to regulate waste disposal in parks, verges, and urban woodlands. Surveillance is supported by environmental inspectors and municipal authorities, particularly in areas like the Sonian Forest and urban green corridors.</p> <p>For all landscape operations, waste from maintenance and mechanical works, such as oil containers, plant residues, and packaging, must be removed and processed by authorised waste handlers. Public reporting of illegal dumping and environmental damage is encouraged and applies to all areas.</p> <p>Comment Foronex Foronex carries out regular field inspections and checks if harvesting teams manage waste responsibly. Littering or pollution is not accepted.</p>
<b>Risk Rating</b>	Low Risk

Belgium European area	Indicator
<b>2.2.9</b>	Harvesting levels shall be justified as to how they can be sustained with reference to inventory and growth data for the Supply Base.
<b>Supply Base Verifiers</b>	<ul style="list-style-type: none"> <li>• Legislation and regulations, authorities and law-enforcement</li> <li>• Inventory data, forestry data, general trends</li> <li>• Critical publications and opinions</li> </ul> <p>Walloon Environmental Legislation – Nature and Forests  <a href="https://environnement.wallonie.be/home/legislation/nature-et-forets.html">https://environnement.wallonie.be/home/legislation/nature-et-forets.html</a>            Bosgroepen – Houtkappen en bosbeheer  <a href="https://bosgroepen.be/houtkappen/">https://bosgroepen.be/houtkappen/</a>            Filière Bois Wallonie – PanoraBois 2024  <a href="https://www.filiereboiswallonie.be/sites/default/files/media-documents/FBW%20-%20PanoraBois%202024_0.pdf">https://www.filiereboiswallonie.be/sites/default/files/media-documents/FBW%20-%20PanoraBois%202024_0.pdf</a>            KBBM – Informatie over de Belgische bossen  <a href="https://kbbm.be/informatie-over-de-bossen/de-belgische-bossen">https://kbbm.be/informatie-over-de-bossen/de-belgische-bossen</a>            Walloon Forest Inventory – Main Portal  <a href="http://iprfw.spw.wallonie.be/">http://iprfw.spw.wallonie.be/</a>            Walloon Forest Inventory – Full Publication  <a href="http://iprfw.spw.wallonie.be/docs/Publication_Inventaire-forestier-wallon.pdf">http://iprfw.spw.wallonie.be/docs/Publication_Inventaire-forestier-wallon.pdf</a>            State of the Environment Wallonia – Forest Resources  <a href="https://etat.environnement.wallonie.be/contents/indicator sheets/RESS%204.html">https://etat.environnement.wallonie.be/contents/indicator sheets/RESS%204.html</a></p>



	<p>Flemish Forest Inventory – Bosareaal  <a href="https://www.natuurenbos.be/vlaamse-bosinventaris/Website_BosAreaal.html">https://www.natuurenbos.be/vlaamse-bosinventaris/Website_BosAreaal.html</a>  Flemish Forest Inventory – Results and Characteristics  <a href="https://www.natuurenbos.be/beleid-wetgeving/natuurbeheer/bosinventaris/resultaten#karakteristieken-bosareaal">https://www.natuurenbos.be/beleid-wetgeving/natuurbeheer/bosinventaris/resultaten#karakteristieken-bosareaal</a>  FAO Global Forest Resources Assessment – Belgium  <a href="https://www.fao.org/3/a-az164f.pdf">https://www.fao.org/3/a-az164f.pdf</a>  FAO Open Knowledge Repository – Global Forests  <a href="https://openknowledge.fao.org/server/api/core/bitstreams/12b68d70-351c-45ae-a331-c2a0d3938fcc/content">https://openknowledge.fao.org/server/api/core/bitstreams/12b68d70-351c-45ae-a331-c2a0d3938fcc/content</a>  National Forest Accounting Plan of Belgium  <a href="https://www.natuurenbos.be/vlaamse-bosinventaris/Website_BosAreaal.html">https://www.natuurenbos.be/vlaamse-bosinventaris/Website_BosAreaal.html</a>  National Inventory Document (NID 1990–2022), submitted December 2024  <a href="https://unfccc.int/documents/644990">https://unfccc.int/documents/644990</a>  Bosinventaris Vlaanderen  <a href="https://www.natuurenbos.be/beleid-wetgeving/natuurbeheer/bosinventaris/resultaten#karakteristieken-bosareaal">https://www.natuurenbos.be/beleid-wetgeving/natuurbeheer/bosinventaris/resultaten#karakteristieken-bosareaal</a></p>
<b>Risk Rating justification</b>	<p>In Belgium, the forest area has a higher average growth rate (increment) than in the north of France and the Netherlands, but it is lower than in Germany. Annual increment (and allowable cut) could possibly decrease in the future, as it is essential to mitigate the increased risks of climate change, like extreme weather, forest fires, and pests.</p> <p>The increased CO<sub>2</sub> concentration in the atmosphere accelerates forest growth. Climate change, however, also results in, for example, periods of extreme rainfall, or drought. Today, the main challenge in order to ensure the long-term productivity of the forests is to improve their resilience to the current and expected effects of climate change. For example, outbreaks of timber-boring insects have already resulted in the loss forest plantations. In the last decades, national and regional authorities have studied this topic and successfully encouraged mitigation measures. Regulatory and financial incentives have been deployed, in particular subsidies for planting in accordance with a guide to species adapted to the present climate. The area of mixed forest stands with native, broadleaved tree species has been increased (although, in average, the growth rate of coniferous plantations is higher). More attention is also paid to the maintenance of soil fertility, and the management of water resources.</p> <p>The monitoring of the forests is mostly executed at the regional level by Regional Forest Inventories. The sampling protocols applied in Flanders and Wallonia are derived from traditional national forest inventory methods, while the inventory in the Brussels Region resembles a forest management assessment (the region has a small forest area of around 17 km<sup>3</sup>). The inventory results are used by policy makers and the wood industry.</p> <p>The three Regional Forest Acts give basic protection from overexploitation of the forests. Harvest levels are justified by means of inventory and growth data, and should not threaten forest productivity, nor the long-term economic viability of the sector. Forest inventory is managed by ANB in Flanders, DNF in Wallonia, and Bruxelles Environnement in the Brussels Region. Each agency is responsible for the data collection and the reporting within its</p>

territory.

According to the Global Forest Resources Assessment for Belgium (FAO, FRA2020), the country's growing stock has steadily increased. The upcoming FRA2025 report is expected to offer updated insights into this trend.

In Wallonia, where more than 75% of the forest area are located, a permanent forest inventory is carried out since 1994. In the last publication on inventory results the period 1994-2012 is assessed (Department of Nature and Forests – Directorate of Forest Resources Permanent inventory of Forest Resources in Wallonia, 2015).

The total volume of standing timber is estimated at more than 113 million m<sup>3</sup> based on the data available for the 2nd cycle. This overall volume, which is shared equally between public and private forests, has increased by almost 5% compared to the 1st cycle. Harvesting levels are considered practically equal to annual increment (growth) in public forests. In private forests they have been (temporarily) higher than the annual increment. For some tree species, like spruce, more is harvested than grows. Coniferous plantations are replaced by broadleaved species and mixed forests. Broadleaved species grew, more than were harvested.

Based on data from 2022 National Inventory Document (NID 1990-2022), Wallonia, with the largest forest area and standing volume, has experienced a temporary overharvest (102% harvest-to-growth ratio) due to the maturation of stands planted in the 1970s. This is not indicative of long-term decline but reflects a planned, time-limited management response. Flanders reports a harvest rate of 70% against its growth, and Brussels reports 27%. Wallonia accounts for approximately 83.0% of the total annual forest felling in Belgium, followed by Flanders with 16.9% and Brussels with just 0.1%. When comparing total felling to total annual forest growth, Belgium harvested about 94.5% of its net annual increment.

The average increment in Wallonia was 10.1 m<sup>3</sup>/ha.yr. 5.4 m<sup>3</sup>/ha.yr for deciduous wood and 16.4 m<sup>3</sup>/ha.yr for coniferous wood. The share of broadleaved trees increased, mainly due to a decline of spruce stands with 16%. The area of mixed forests also increased significantly. The total volume of standing timber is estimated at more than 113 million m<sup>3</sup> based on the data available for the 2nd cycle. This overall volume, which is shared equally between public and private forests, has increased by almost 5% compared to the 1st cycle. Harvesting levels are considered practically equal to annual increment (growth) in public forests. In private forests they have been (temporarily) higher than the annual increment. For some tree species, like spruce, more is harvested than grows. Coniferous plantations are replaced by broadleaved species and mixed forests. Broadleaved species grew, more than were harvested.

According to the forest inventory of Flanders, the transition from homogeneous coniferous stands to more diverse forests is well underway. Data from 1997–1999 and 2009–2019 show a decline in homogeneous stands from 54.9% to 41.6%, and further to 41.4% in 2012–2021. Specifically, homogeneous coniferous stands decreased from 30.6% to 21.7%, reaching 20.7% in the latest period. Since 2000, around 18,900 hectares of homogeneous forests have been converted, increasing species diversity and

	<p>structural quality. Continuous monitoring, introduced with the third forest inventory in May 2019, ensures assessment every 10 years.</p> <p>The average increment in Flanders has increased to 8.7 m<sup>3</sup>/ha.yr. 7.2 m/ha.yr for deciduous wood and 11.3 m<sup>3</sup>/ha.yr for coniferous wood. In average, annual increment is around 1 m<sup>3</sup>/ha.yr. higher in public forests than in private forests. The annual increment is also studied per tree species, ecoregion, and 'forest group'.</p> <p>The average stock of standing timber per ha has increased between the two measurement cycles from 216.49 m<sup>3</sup>/ha to 273.65 m<sup>3</sup>/ha. Around 70% of the annual increment is estimated to be harvested, what is a desirable level for sustainability. In only around 60% of the private forests forest harvesting is actually considered.</p> <p>On the basis of volume and base area Scots pine remained the most common tree species in Flanders. Although the share of forest area of Scots pine decreased from 30% to 23%, the volume of Scots pine (m<sup>3</sup>) has increased slightly anyway. The share of forests with three or more diameter classes (0-20 cm, 20-40 cm, 40-60 cm, &gt; 60 cm) increased from an average of 39% to 68%. Related to this, the occurrence of three or more vegetation layers is now significantly higher (from 85% to 94%).</p> <p>FAOstat indicates domestic production of all kinds of roundwood has increased in Belgium with 5-15% between 2008 and 2020. Only the production of coniferous pulpwood stayed at the same level. In that same period, the production of fuel wood increased with 29%. Around 93% of the fuel wood is from broadleaved tree species.</p>
<b>Risk Rating</b>	Low Risk

Belgium European area	Indicator
<b>2.2.10</b>	Harvested areas shall be regenerated
<b>Supply Base Verifiers</b>	<ul style="list-style-type: none"> <li>• Legislation and regulations, authorities and law-enforcement</li> <li>• Inventory data, forestry data, general trends</li> <li>• Critical publications and opinions</li> </ul> <p>REDII Level A Report Wallonia by BiomassConsult  <a href="https://energie.wallonie.be/servlet/Repository/REDII-Level-A-Wallonia-BiomassConsult.pdf?ID=78774">https://energie.wallonie.be/servlet/Repository/REDII-Level-A-Wallonia-BiomassConsult.pdf?ID=78774</a>            Forest Decree Flanders – Legal Protection and Compensation Obligations  <a href="https://www.natuurenbos.be/beleid-wetgeving/bosdecreet">https://www.natuurenbos.be/beleid-wetgeving/bosdecreet</a>            Walloon Forest Code – Amendments Related to Management Plan and Regeneration  <a href="https://wallex.wallonie.be/eli/decret/2020/04/16/2020022294">https://wallex.wallonie.be/eli/decret/2020/04/16/2020022294</a>            Bruxelles Environnement – Forest Management and Environmental Ordinances  <a href="https://environnement.brussels/thematiques/nature-et-foret/gestion-des-forets">https://environnement.brussels/thematiques/nature-et-foret/gestion-des-forets</a>            Flemish Spatial Planning Codex (VCRO) – Protection of Small Landscape</p>

	<p>Elements</p> <p><a href="https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1021211">https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1021211</a></p> <p>Royal Decree on Nature Conservation and Spatial Planning in Wallonia</p> <p><a href="https://environnement.wallonie.be/legis/dnf/forets.htm">https://environnement.wallonie.be/legis/dnf/forets.htm</a></p> <p>National Forestry Accounting Plan of Belgium</p> <p><a href="https://www.cnc-nkc.be/sites/default/files/report/file/national_forestry_accounting_plan_-_belgium_-_18122019_1.pdf">https://www.cnc-nkc.be/sites/default/files/report/file/national_forestry_accounting_plan_-_belgium_-_18122019_1.pdf</a></p> <p>Forest Expansion and Quality in Flanders</p> <p><a href="https://www.researchgate.net/publication/316487917_39_Forest_expansion_and_quality_in_Flanders">https://www.researchgate.net/publication/316487917_39_Forest_expansion_and_quality_in_Flanders</a></p> <p>Forest Clearances, Compensatory Afforestation and Biodiversity Offsetting</p> <p><a href="https://www.sciencedirect.com/science/article/pii/S1389934124000728">https://www.sciencedirect.com/science/article/pii/S1389934124000728</a></p> <p>Nature Restoration Regulation – European Union</p> <p><a href="https://environment.ec.europa.eu/topics/nature-and-biodiversity/nature-restoration-regulation_en">https://environment.ec.europa.eu/topics/nature-and-biodiversity/nature-restoration-regulation_en</a></p> <p>Forest Management and Climate Change in the Walloon Region of Belgium</p> <p><a href="https://www.fao.org/4/y5189e/y5189e10.htm">https://www.fao.org/4/y5189e/y5189e10.htm</a></p>
<b>Risk Rating justification</b>	<p>In Belgium, the requirement for regenerating harvested forest areas is governed by regional legislation.</p> <p>In Wallonia, the Forest Code—particularly Article 57 as amended by the decree of 16 April 2020—mandates that all forests owned by legal public persons and larger than 20 hectares must be managed under a formal forest management plan. This obligation came into force on 31 December 2023. These plans include detailed provisions for the regeneration of harvested areas, either through natural regeneration or replanting, with a strong preference for native species and climate-resilient forest compositions. The Département de la Nature et des Forêts (DNF) is the competent authority in Wallonia, responsible for overseeing implementation and enforcement. It conducts regular inspections using field visits and satellite monitoring to ensure compliance, and can impose corrective measures in case of failure to regenerate.</p> <p>In Flanders, the Forest Decree requires that public forests and private holdings exceeding five hectares have a forest management plan. These plans must account for regeneration and biodiversity goals, particularly following harvesting. The Agentschap voor Natuur en Bos (ANB) is responsible for approving plans and ensuring compliance. Regeneration is monitored through inspections, and the agency provides support to forest owners, including technical guidance and, in some cases, financial incentives.</p> <p>In Flanders, forests may not be cleared or converted to other land uses, except in exceptional cases where prior authorisation is granted and full compensation is provided. This compensation obligation applies to all types of forest stands, including both large forest blocks and smaller wooded plots. The decree also protects small landscape elements, such as tree rows, hedgerows, and isolated wooded patches. Their removal is subject to the same legal constraints and compensation requirements.</p> <p>In the Brussels-Capital Region, where forested areas are more limited and mainly include the Brussels section of the Sonian Forest, forest policy is</p>

managed by Bruxelles Environnement. Although forest legislation is less extensive than in the other regions due to the smaller forest area, regeneration after harvesting is still regulated under the applicable regional nature and environmental ordinances. Bruxelles Environnement ensures that any harvesting in public forests is accompanied by replanting or natural regeneration measures, especially within protected or ecologically valuable zones.

Across all three regions, regeneration obligations are reinforced by international sustainability certification schemes such as FSC and PEFC, which require effective regeneration practices. Regional authorities monitor compliance, and enforcement is supported through legal instruments and administrative procedures tailored to forest size, ownership type, and ecological significance.

#### Trees Outside Forests (TOF) – Landscape Feedstock

In the case of trees and small stands in landscapes, regeneration is not automatically required under general forest legislation, as these features typically fall outside the formal definition of forest. However, when they qualify as small landscape elements (SLEs), they may be subject to legal protection, particularly in Flanders. The concept of SLEs is defined in Flemish spatial and nature conservation legislation and includes elements such as hedgerows, tree rows, and wooded banks. Their removal is prohibited unless explicitly authorised, and compensation through replanting or equivalent ecological restoration is typically required. Operations affecting SLEs must comply with the relevant decrees (e.g. Forest Decree, Nature Decree, and the Spatial Planning Codex), and may require a permit, especially when located in ecologically valuable areas or spatially protected zones.

In Wallonia, while the term SLE is not used as a legal category, similar landscape features are often regulated under environmental and spatial planning rules. Trees in open landscapes, along roads, in erosion-sensitive zones, or near watercourses may be protected under local or regional ordinances. Removal of such trees may be prohibited or require a permit depending on their location and function. In many municipalities, prior authorisation is needed before felling isolated trees or small groves, especially where they contribute to ecological connectivity, erosion control, or public amenity. Operations such as pruning, felling, or maintenance of trees in the landscape are also subject to technical rules regarding timing, protection of habitat, and minimisation of soil disturbance.

While trees outside forests are generally not subject to formal forest regeneration requirements, legal obligations often apply once these trees serve a spatial, ecological, or protective function. In such cases, removal without authorisation can lead to enforcement actions, and regeneration or compensation is frequently mandated either directly through permits or indirectly through spatial planning conditions.

#### Comment Foronex

Foronex inspects and visits most forest plots and nearly all landscape areas. Inspected is if the operator has a permit, and if it should have one. This

	indicator is low risk, but compliance with laws and regulations is checked as a standard requirement for all plots. See general mitigation procedure (indicator 2.1.3).
<b>Risk Rating</b>	Low Risk

Belgium European area	Indicator
<b>2.2.11</b>	The impacts of natural processes such as fires, pests and diseases shall be managed.
<b>Supply Base Verifiers</b>	<ul style="list-style-type: none"> <li>• Legislation and regulations, authorities and law-enforcement</li> <li>• Government programmes</li> <li>• Statistical and inventory data, trends</li> <li>• Assessment of critical publications and opinions</li> </ul> <p>Depicker, A., De Baets, B. and J.M. Baetens, 2020. Wildfire ignition probability in Belgium. <i>Natural Hazards and Earth System Sciences</i> 20: 363-376 pp.  <a href="https://nhess.copernicus.org/articles/20/363/2020/">https://nhess.copernicus.org/articles/20/363/2020/</a>          Seidl, R. et al. (2011) Unraveling the drivers of intensifying forest disturbance regimes in Europe. <i>Global Change Biology</i> 17: 2842–2852.  <a href="https://onlinelibrary.wiley.com/doi/full/10.1111/j.1365-2486.2011.02452.x">https://onlinelibrary.wiley.com/doi/full/10.1111/j.1365-2486.2011.02452.x</a>          FAO – Deforestation and Land Degradation in Europe  <a href="https://www.fao.org/3/cb9360en/online/src/html/deforestation-land-degradation.html">https://www.fao.org/3/cb9360en/online/src/html/deforestation-land-degradation.html</a>          ReforestAction – Mixed Species Forests Replacing Spruce Monocultures in Belgium  <a href="https://www.reforestaction.com/en/blog/belgium-stand-various-species-has-been-created-out-spruce-monoculture-used-be-gnawed-bark">https://www.reforestaction.com/en/blog/belgium-stand-various-species-has-been-created-out-spruce-monoculture-used-be-gnawed-bark</a>          Nieuwe cijfers over de groei van bomen in Vlaanderen  <a href="https://www.natuurenbos.be/beleid-wetgeving/natuurbeheer/bosinventaris/resultaten#karakteristieken-bosareaal">https://www.natuurenbos.be/beleid-wetgeving/natuurbeheer/bosinventaris/resultaten#karakteristieken-bosareaal</a>          Climate Change Post – Forest Fires in Belgium  <a href="https://www.climatechangepost.com/belgium/forest-fires/">https://www.climatechangepost.com/belgium/forest-fires/</a>          EFI – Forest Disturbance and Management Trends in Europe  <a href="https://efi.int/sites/default/files/files/publication-bank/2019/efi_fstp_8_2019.pdf">https://efi.int/sites/default/files/files/publication-bank/2019/efi_fstp_8_2019.pdf</a>          Global Forest Watch – Belgium Fire Dashboard  <a href="https://www.globalforestwatch.org/dashboards/country/BEL/?category=fires">https://www.globalforestwatch.org/dashboards/country/BEL/?category=fires</a>          CERAC – Belgium Preparing for More Frequent and Intense Wildfires  <a href="https://www.cerac.be/en/publications/2025-02-belgium-ready-more-frequent-and-intense-wildfires">https://www.cerac.be/en/publications/2025-02-belgium-ready-more-frequent-and-intense-wildfires</a>          INBO Indicatoren – Aandeel Beschadigde Bosbomen in Vlaanderen  <a href="https://www.vlaanderen.be/inbo/indicatoren/aandeel-beschadigde-bosbomen">https://www.vlaanderen.be/inbo/indicatoren/aandeel-beschadigde-bosbomen</a>          Evolution of the Bark Beetle Crisis in Spruce Forests (Belgium and NE France)  <a href="https://www.researchgate.net/publication/371997657_Evolution_of_the_bark_beetle_crisis_in_spruce_Picea_abies_forests_A_spatial_and_temporal_remo">https://www.researchgate.net/publication/371997657_Evolution_of_the_bark_beetle_crisis_in_spruce_Picea_abies_forests_A_spatial_and_temporal_remo</a></p>



	<p>te_sensing_analysis_in_Belgium_and_North-eastern_France</p> <p>eJustice – Belgian Legislative Portal</p> <p><a href="http://www.ejustice.just.fgov.be/cgi_loi/chang">http://www.ejustice.just.fgov.be/cgi_loi/chang</a></p>
<b>Risk Rating justification</b>	<p>The three regional forestry acts require that forest owners establish 'healthy forests' with a high level of resistance and resilience towards known calamities such as fires, pests, windfall, and flooding. Forest managers are required to apply silvicultural methods that improve the stability of forest stands.</p> <p>Generally, fires, pests and diseases occur at a small scale and can be managed by the forest owner. The most common natural impact on forest stands is storm damage.</p> <p>The forest inventory of Wallonia reports on stem breakage due to windfall. Overall, 5% of the stands are affected among which the damage is rarely widespread. The damaged areas where mostly less than 1 hectare. Normally less than 5% of the stems had snapped (regarding both isolated windthrows and large damaged areas).</p> <p>State forests are managed according to 'close to nature' forest management principles with the intent to promote species composition and forest structure with high level of resistance and resilience. The forest management measures to fight pests, fires and diseases are carried out by each forest owner separately, or through forest groups. Information on these topics are provided online and in forestry journals. One can also hire a consultant.</p> <p>There is a national, country-wide system of fire services, and most forest areas can be reached quickly by road. The prevalence of wildfires in Belgium is limited. The annual burnt area rarely exceeds 40 ha. In 2011, a year with an exceptionally dry spring characterized by 70% less precipitation than usual, around 2360 ha of land was affected by wildfires.</p> <p>Belgium, traditionally marked by a low occurrence of wildfires, is becoming increasingly vulnerable due to the escalating impacts of climate change. Rising temperatures and prolonged periods of drought are creating conditions that heighten the risk of more frequent and severe wildfires. In response, the country is actively refining its wildfire management strategies to address this growing threat. As detailed in the report "Is Belgium Ready for More Frequent and Intense Wildfires? Analysis of the Belgian State of Play and Insights from the International Context", published by the Climate Risk Assessment Centre (CERAC) and the National Geographic Institute (NGI), these efforts include enhancing monitoring systems, implementing proactive prevention measures, and reinforcing rapid response capabilities. Recognising the critical importance of protecting its natural resources and key infrastructure, Belgium is undertaking decisive actions to strengthen its resilience against the increasing likelihood of wildfire incidents. It is enhancing wildfire preparedness through AI-based monitoring systems for early detection and a fire warning index in Flanders to improve risk communication and prevention. By law, fire prevention of forests is organised by the Département de la Nature et des Forêts (DNF), Agentschap voor Natuur en Bos (ANB), or Brussels Instituut voor Milieubeheer (BIM). When needed, assessments are made on a daily basis, in cooperation with the Belgian air force. A colour code system to indicate the danger level is used. Colour codes are explained on</p>

	<p>municipality websites and in the bigger forest/nature areas on special signposts. These levels of danger are automatically shared with the fire fighters, who respond to this by going to a higher or lower 'alert' level. When the danger is highest, fire-towers are manned with staff, extra patrols take place and forest owners are warned. If needed, the general public can be informed through the government mobile telephone alarm system BE-Alert.</p> <p>Most forest managers in Belgium are well educated and address the current risks in an adequate way. Due to climate change, however, forests will endure more stress factors and some will decline. A period of drought, for example, increases the chance of stress and decreased health, what increases the chance of pests, what increases the amount of dead timber, what increases the chance of a forest fire, what increases the chance on erosion and landslides.</p> <p>Government policies, legislation and regulations have successfully advocated establishing more resistant and resilient forests. Forests with several tree species, of different ages, and diameter are better adapted to climate change. Current forestry practices favour native tree species best adapted to local conditions. Natural or imitated natural regeneration is considered a method of maintaining genetic diversity, and subsequently reducing vulnerability. The establishment of migration corridors between forest reserves may aid in the autonomous colonization and migration of species in response to climate change.</p> <p>Belgium belongs to a small list of European countries where the annual damage caused by bark beetles in forests, where is expected to increase six times in the period 2021–2030, compared to 1971–2010 (Seidl et al. 2014). Government initiatives will probably prove this projection incorrect, as monocultures of pine and spruce have been decreasing significantly over the years.</p> <p>The Seidl et al. (2014) projection of increased bark beetle damage in Belgian forests is largely supported by recent data. The 2017-2022 study, "Evolution of the bark beetle crisis in spruce (<i>Picea abies</i>) forests: A spatial and temporal remote sensing analysis in Belgium and North-eastern France" <sup>1</sup> (De Ligne et al., 2023), reveals a significant 12.2% loss of spruce area, directly attributed to bark beetle outbreaks. This devastation, triggered by the 2018 drought and exacerbated by hot years, demonstrates substantial damage. Regional variations saw the plains experience a catastrophic 50% spruce forest loss. These findings validate the Seidl et al. prediction, highlighting the critical role of climate-driven conditions in escalating bark beetle damage.</p> <p>The federal level and the three Regions have now adopted their own climate change mitigation plans. In addition, the national adaptation plan of Belgium complements the regional plans by identifying specific adaptation measures that need to be taken at a national level in order to strengthen cooperation and develop synergies between the different entities on adaptation. Also some provincial and local governments are developing adaptation plans. See also 2.2.7 for Integrated Pest Management (IPM).</p>
<b>Risk Rating</b>	Low Risk

Belgium European area	Indicator
2.2.12	Genetically modified trees shall not be used.
Supply Base Verifiers	<ul style="list-style-type: none"> <li>• Legislation and regulations, authorities and law-enforcement</li> <li>• Development programmes, data, trends</li> <li>• Critical publications and opinions</li> </ul> <p>Belgian Biosafety Server – Notification Procedure for Environmental Release of GMOs  <a href="https://www.biosafety.be/content/notification-procedure-submitting-notification-environmental-release-belgium-gmo">https://www.biosafety.be/content/notification-procedure-submitting-notification-environmental-release-belgium-gmo</a></p> <p>Belgian Biosafety Server – Field Trials with GM Plants: Database  <a href="https://www.biosafety.be/content/field-trials-gm-plants-database">https://www.biosafety.be/content/field-trials-gm-plants-database</a></p> <p>Biosafety Advisory Council – Homepage  <a href="https://www.bio-council.be/en">https://www.bio-council.be/en</a></p> <p>Belgian Biosafety Clearing-House – Regulatory Framework  <a href="https://www.biosafetyprotocol.be/regulatory-framework">https://www.biosafetyprotocol.be/regulatory-framework</a></p> <p>FPS Health – Summary Notification Information Format (SNIF)  <a href="https://www.health.belgium.be/sites/default/files/uploads/fields/fpshealth_the_me_file/snif.pdf">https://www.health.belgium.be/sites/default/files/uploads/fields/fpshealth_the_me_file/snif.pdf</a></p> <p>FPS Health – Deliberate Release of GMOs  <a href="https://www.health.belgium.be/en/node/45590">https://www.health.belgium.be/en/node/45590</a></p> <p>ILVO – Nieuwe veldproef met genetisch gewijzigde populier  <a href="https://ilvo.vlaanderen.be/nl/nieuws/nieuwe-veldproef-met-genetisch-gewijzigde-populier">https://ilvo.vlaanderen.be/nl/nieuws/nieuwe-veldproef-met-genetisch-gewijzigde-populier</a></p> <p>Nature Biotechnology – Field Trials of Genetically Modified Trees  <a href="https://www.nature.com/articles/nbt0609-506">https://www.nature.com/articles/nbt0609-506</a></p> <p>FAO – Field Trial of Genetically Modified Trees in Belgium  <a href="https://www.fao.org/forestry/download/33497-0d7e09e86891abf0956738a10e8288344.pdf">https://www.fao.org/forestry/download/33497-0d7e09e86891abf0956738a10e8288344.pdf</a></p> <p>FSC – Genetically Modified Trees: Technical Considerations  <a href="https://connect.fsc.org/document-centre/documents/resource/397">https://connect.fsc.org/document-centre/documents/resource/397</a></p>
Risk Rating justification	<p>All use of Genetically modified (GM) organisms, even in laboratory experiments or field trials, is subject to licenses/permits delivered by the competent federal ministry, only after thorough investigation by the Biosafety Council ('Bioveiligheidsraad' / 'Conseil consultatif de Biosécurité') and after public consultation and positive advice from the competent regional minister. There is no commercial use of GM trees in Belgium.</p> <p>From 1987 to 2002, Belgium had a growing field trial culture reflecting the country's advanced research in plant biotech. In 1983, researchers in Ghent were the first to develop a genetically engineered plant. The trial in 1987 was one of the first in the world, but after 2002, the number of field trials dropped down to zero as the result of regulatory uncertainty surrounding the implementation of the 2001/18 EU directive on the deliberate release of genetically modified organisms. Laboratory research on plant biotech, however, has always kept up its pace.</p> <p>On May 2009, the Minister of Science and Innovation of Flanders (Belgium)</p>

	<p>planted a tree. It was the first genetically modified poplar to be planted in an open field trial by the Flanders Institute for Biotechnology, to be followed by the planting of 119 more GM poplars over the next few days on the same site.</p> <p>The project was subjected to public consultation. The Biosafety Council gave a positive advice for the trials. The application was anyway at first refused in May 2008. VIB took legal action at the Council of State (the highest Belgian court) and finally got the authorization in mid-February 2009. The authorization was a landmark in the genetically modified organism field trial history in Belgium. It was the first field trial in Belgium since 2002. The trials were approved, under a large number of conditions, by the federal competent Minister of Public Health and the State Secretary for Environment.</p> <p>Flanders Institute for Biotechnology is funded by the Flemish government, but the participation of the Minister in this particular activity was by many seen as a political declaration against government officials who had opposed to this field trial, against organizations such as Nature &amp; Progrès Belgique and Greenpeace Belgium, and also against many people of the general public that had expressed being against the use of the GM trees.</p> <p>Beginning of 2021, the Flanders Institute for Biotechnology submitted a new application for a field trial with genetically modified poplars. The trees have a modified wood composition. The wood has around 20% less lignin and can more easily be converted into sugars. These trials, approved in Januari 2024 running until April 2028, are subject to strict monitoring and safety protocols, as mandated by the Biosafety Council, to mitigate potential environmental or health risks. The research aims to assess the viability of these modified poplars for sustainable biomass utilization, with VIB responsible for comprehensive monitoring and risk management.</p> <p>The researchers of these kind of scientific field trials with GMO trees try to contain the spreading of the genetic material. The trials are for research purposes only. After a few short rotations the trees, including their roots, are destroyed. The biomass from these plots does not end up on the market.</p>
<b>Risk Rating</b>	Low Risk

Belgium European area	Indicator
<b>3.1.1</b>	<p>LULUCF emissions shall be accounted for through one of the following routes: Route A Feedstock may be sourced from a country of origin which is party to the Paris Agreement, and which has submitted a Nationally Determined Contribution to the United Nations Framework Convention on Climate Change (UNFCCC) covering carbon emissions and removals from agriculture, forestry and land use which ensure the changes in carbon stock associated with biomass harvest are counted towards the country's commitment to reduce or limit greenhouse gas emissions, or Route B Feedstock may be sourced from a country of origin which is party to the Paris Agreement and has national or sub-national laws in place (developed in accordance with Article 5 of the Paris Agreement and applicable in the area of harvest), to conserve and enhance carbon stocks and sinks, and provided there is evidence that reported LULUCF-sector emissions do not exceed removals, or Route C Feedstock may be sourced from a Supply Base where an assessment demonstrates that both the carbon stock is stable, and the forests' capacity to act as a carbon sink is stable or increasing</p>

	over the long term.
<b>Supply Base Verifiers</b>	<ul style="list-style-type: none"> <li>• International conventions ratified</li> <li>• Laws and regulations, authorities, and law enforcement</li> <li>• Internet research into this issue and critical publications</li> </ul> <p>SBP RED Level A risk assessment (Article 29.7 – LULUCF)  <a href="https://sbpcert.wpenginepowered.com/wp-content/uploads/2024/09/SBP-REDII-Level-A-risk-assessment-for-Art-29-7-LULUCF-v1.3_12Sep24.xlsx">https://sbpcert.wpenginepowered.com/wp-content/uploads/2024/09/SBP-REDII-Level-A-risk-assessment-for-Art-29-7-LULUCF-v1.3_12Sep24.xlsx</a>          Belgium's National Energy and Climate Plan (NECP) website  <a href="https://www.nationalenergyclimateplan.be/en">https://www.nationalenergyclimateplan.be/en</a>          European Union NDC update (Revised First NDC – 2023)  <a href="https://unfccc.int/sites/default/files/NDC/2023-10/ES-2023-10-17%20EU%20submission%20NDC%20update.pdf">https://unfccc.int/sites/default/files/NDC/2023-10/ES-2023-10-17%20EU%20submission%20NDC%20update.pdf</a>          Paris Agreement signature and declaration by Belgium  <a href="https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&amp;mtdsg_no=XXVII-7-d&amp;chapter=27&amp;clang=_en">https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&amp;mtdsg_no=XXVII-7-d&amp;chapter=27&amp;clang=_en</a>          Belgium Long-Term Strategy (LTS) – roles and responsibilities summary  <a href="https://unfccc.int/sites/default/files/resource/LTS_BE_EN_summary.pdf">https://unfccc.int/sites/default/files/resource/LTS_BE_EN_summary.pdf</a>          NECP website – includes institutional contributions from federal and regional levels  <a href="https://www.nationalenergyclimateplan.be/en">https://www.nationalenergyclimateplan.be/en</a>          Belgium. 2024 National Inventory Document (NID 1990–2022)  <a href="https://unfccc.int/documents/644990">https://unfccc.int/documents/644990</a>          Belgium. 2024 Common Reporting Table (CRT) – including LULUCF sector data  <a href="https://unfccc.int/documents/644992">https://unfccc.int/documents/644992</a>          Belgium. Biennial Transparency Report 1 (BTR1), CTF-NDC (18.12.2024)  <a href="https://unfccc.int/documents/644984">https://unfccc.int/documents/644984</a>          Belgium. 2025 Biennial Transparency Report (BTR1)  <a href="http://unfccc.int/documents/644983">http://unfccc.int/documents/644983</a>          Internet verification (March 2025) found no new developments affecting compliance  <a href="https://www.nationalenergyclimateplan.be/en">https://www.nationalenergyclimateplan.be/en</a>          UNFCCC-hosted reporting (BTR, NID, CRT) confirms Belgium's alignment with RED and LULUCF targets  <a href="https://unfccc.int/NDCREG">https://unfccc.int/NDCREG</a></p>
<b>Risk Rating justification</b>	<p>An independent assessment approved by SBP, confirms that Belgium meets the land use, land-use change, and forestry (LULUCF) requirements outlined in the Renewable Energy Directive (RED), qualifying for compliance under “Route A”. Upon signing the Paris Agreement, Belgium declared that its commitment includes the Walloon Region, the Flemish Region, and the Brussels-Capital Region. This assessment remains valid, with no recent developments indicating a change in Belgium's compliance status.</p> <p>Belgium maintains a dedicated National Energy and Climate Plan (NECP) website, providing access to various versions of the plan, results of public consultations, regional inputs, and related recommendations. The updated LULUCF Regulation sets an EU-wide target of 310 million tonnes of CO<sub>2</sub></p>

	<p>equivalent in net removals from the LULUCF sector by 2030.</p> <p>Belgium regularly submits information to the European Environment Agency (EEA), including greenhouse gas inventories, approximated inventories for the previous year, updates on policies and measures, emission projections, and progress towards NECP implementation. This reporting supports the EU's ongoing monitoring and allows for corrective action if progress toward 2030 climate and energy targets falls behind.</p> <p>The European Commission assesses draft NECPs, including LULUCF components, and provides recommendations to improve planning and implementation. All submitted data are subject to quality checks, and the greenhouse gas inventories reported by Member States, including for the LULUCF sector, will undergo EU-level reviews in 2025, 2027, and 2032.</p> <p>Trees Outside Forests (TOF) – Landscape and Urban Feedstock</p> <p>The results are the same as mentioned above.</p>
<b>Risk Rating</b>	Low Risk

Belgium European area	Indicator
<b>3.2.1</b>	<p>All feedstock sourcing shall be consistent with either of these two options: Option A. Feedstock may be sourced from Supply Bases where an assessment of the Supply Base shows that the forest carbon stocks are stable or increasing, or Option B. Feedstock may be sourced, if the assessment shows that the forest carbon stocks are declining in the Supply Base, provided that the decline is due to natural processes (fire, pests etc.), and sourcing of feedstock has the aim to recover feedstock that would otherwise be lost or to assist regeneration.</p>
<b>Supply Base Verifiers</b>	<ul style="list-style-type: none"> <li>• International conventions ratified</li> <li>• Laws and regulations, authorities, and law enforcement</li> <li>• Internet research into this issue and critical opinions</li> </ul> <p>Belgium. National Inventory Document (NID 1990–2022), submitted December 2024  <a href="https://unfccc.int/documents/644990">https://unfccc.int/documents/644990</a></p> <p>Belgium. First Biennial Transparency Report (BTR1), submitted February 2025  <a href="https://unfccc.int/documents/644983">https://unfccc.int/documents/644983</a></p> <p>Belgian Integrated National Energy and Climate Plan (NECP) 2021–2030  <a href="https://www.cnc-nkc.be/sites/default/files/report/file/national_forestry_accounting_plan_-_belgium_-_18122019_1.pdf">https://www.cnc-nkc.be/sites/default/files/report/file/national_forestry_accounting_plan_-_belgium_-_18122019_1.pdf</a></p> <p>FAO. Évaluation des ressources forestières mondiales (FRA) 2020 – Belgique  <a href="https://openknowledge.fao.org/server/api/core/bitstreams/12b68d70-351c-45ae-a331-c2a0d3938fcc/content">https://openknowledge.fao.org/server/api/core/bitstreams/12b68d70-351c-45ae-a331-c2a0d3938fcc/content</a></p> <p>PanoraBois Wallonia – Overview of the forest-wood sector (OEWB, 2021)  <a href="https://www.filiereboiswallonie.be/sites/default/files/media-documents/OEWB-PanoraBois_2021_0.pdf">https://www.filiereboiswallonie.be/sites/default/files/media-documents/OEWB-PanoraBois_2021_0.pdf</a></p>



	<p>INBO – Research Institute for Nature and Forest (Flanders)  <a href="https://www.vlaanderen.be/inbo/en-gb/homepage/">https://www.vlaanderen.be/inbo/en-gb/homepage/</a>          ResearchGate – Spatial distribution of belowground organic carbon in Belgian forests (2000)  <a href="https://www.researchgate.net/figure/Spatial-distribution-of-BOC-stock-kg-C-m-2-in-Belgian-forests-in-the-year-2000-The_fig1_43326882">https://www.researchgate.net/figure/Spatial-distribution-of-BOC-stock-kg-C-m-2-in-Belgian-forests-in-the-year-2000-The_fig1_43326882</a>          Frontiers in Forests and Global Change (2024) – Biomass carbon stock change modelling for Belgium  <a href="https://www.frontiersin.org/journals/forests-and-global-change/articles/10.3389/ffgc.2024.1236203">https://www.frontiersin.org/journals/forests-and-global-change/articles/10.3389/ffgc.2024.1236203</a>          Organic carbon stocks and changes in forest biomass in Belgium (inventory-based approach)  <a href="https://cdr.eionet.europa.eu/be/eu/mmr/lulucf/envykvycq/KP-LULUCF-529-BEL-2022-2020.xlsx/manage_document">https://cdr.eionet.europa.eu/be/eu/mmr/lulucf/envykvycq/KP-LULUCF-529-BEL-2022-2020.xlsx/manage_document</a>          Global Forest Watch – Forest carbon flux and deforestation tracking  <a href="https://www.globalforestwatch.org/">https://www.globalforestwatch.org/</a>          FAOstat – Belgium forest carbon stock data (living biomass and land use)  <a href="https://www.fao.org/faostat/en">https://www.fao.org/faostat/en</a></p>
<b>Risk Rating justification</b>	<p>Belgium meets the requirements of Option A: feedstock sourcing occurs in a Supply Base where forest carbon stocks are stable or increasing. Available data, inventories, and reports confirm that in general forest carbon stocks in Belgium are stable or increasing. Where regional harvesting exceeds growth (in Wallonia), this is a temporary result of forest maturation rather than a long-term issue.</p> <p>In Belgium, forestry laws and regulations are enforced at the regional level. In Wallonia, the Department of Nature and Forests (DNF) oversees compliance with sustainable forestry practices and biomass management. In Flanders, this responsibility falls to the Agency for Nature and Forests (ANB). In the Brussels-Capital Region, the Brussels Environment administration is in charge. Forest activities are governed by the regional Forest Codes and environmental laws, which promote sustainable forest management, biodiversity conservation, and the monitoring of forest carbon stocks. Flanders and Wallonia regularly conduct forest inventories and monitor biomass and carbon stock dynamics. Although the Brussels-Capital Region is highly urbanised and contributes less to national forest carbon sequestration, it supports urban forestry and green infrastructure for carbon storage and air quality.</p> <p>FAOstat data show that carbon storage in Belgium’s living forest biomass increased from 66.7 million tonnes in 2008 to 71.8 million tonnes in 2020 — a 7.6% increase, despite only a 0.25% increase in forest area. Since 2016, Belgium’s forests have maintained a positive net annual CO<sub>2</sub> balance. FAO’s Global Forest Resources Assessment 2020 (Belgique) also highlights rising carbon stocks per hectare across all forest carbon pools (above ground, below ground, deadwood, humus, and soil) between 1990 and 2015. According to the First Biennial Transparency Report under the Paris Agreement (18 Dec. 2024) and Belgium’s National Inventory Document (NID 1990-2022), forests are a consistent national carbon sink. The land-use</p>

	<p>change matrix for the LULUCF sector is compiled by the three regions using GIS data, forest inventories, and region-specific sources such as soil organic carbon. Between 1990 and 2022, forest land emitted an average of -2000 Gg CO<sub>2</sub>-eq annually, making forests Belgium's largest carbon sink category. In Flanders, long-term monitoring shows an upward trend in carbon sequestration, suggesting that conservation-oriented management contributes positively to carbon storage. Walloon forests also show changes in organic carbon stocks over time, though their net sequestration is lower than in Flanders.</p> <p>Global Forest Watch data confirm a national net sink: from 2001 to 2023, Belgium's forests emitted 2.73 Mt CO<sub>2</sub>e annually and captured 5.69 Mt CO<sub>2</sub>e, resulting in an average net sink of -2.95 Mt CO<sub>2</sub>e per year.</p> <p>Belgium stores an estimated 57.8 million tonnes of carbon in forest biomass. Forest carbon density varies: broadleaf forests store an average of 10.0 kg C/m<sup>2</sup>, coniferous forests 9.5 kg C/m<sup>2</sup>, and mixed forests 8.7 kg C/m<sup>2</sup>.</p> <p>Flanders has reported annual losses of soil organic carbon in mineral soils (20 to 381 ha/year between 1990 and 2022), partly due to the lower baseline carbon content of forest soils compared to wetlands. However, more land has been converted from forests to wetlands (30 to 571 ha/year) than vice versa, contributing positively to national land carbon dynamics. N<sub>2</sub>O emissions from these land-use changes are also accounted for.</p> <p>Unlike countries such as the Netherlands, Belgium has nearly no forests on drained peatland, meaning it avoids the chronic CO<sub>2</sub> emissions associated with such drained soils.</p>
<b>Risk Rating</b>	Low Risk

Belgium European area	Indicator
<b>3.2.2</b>	Primary feedstock shall not be sourced from forest areas where site productivity is low and, according to local definitions or norms, the areas are classified as low-productive or difficult to regenerate.
<b>Supply Base Verifiers</b>	<ul style="list-style-type: none"> <li>• International conventions ratified</li> <li>• Laws and regulations, authorities, and law enforcement</li> <li>• Internet research into this issue and critical opinions</li> </ul> <p>Ramsar Site Information Sheet – Zwin Nature Reserve  <a href="https://rsis Ramsar.org/ris/1407">https://rsis Ramsar.org/ris/1407</a>  Ramsar Country Profile – Belgium  <a href="https://www Ramsar.org/country-profile/belgium">https://www Ramsar.org/country-profile/belgium</a>  Forest Europe – Official Country Profiles on Forests and Forestry  <a href="https://foresteurope.org/wp-content/uploads/2017/08/Country-profiles-on-forests-and-forestry.pdf">https://foresteurope.org/wp-content/uploads/2017/08/Country-profiles-on-forests-and-forestry.pdf</a>  Forest Europe – Ministerial Conference on the Protection of Forests in Europe  <a href="https://foresteurope.org">https://foresteurope.org</a>  Convention on Biological Diversity – Belgium 6th National Report</p>

	<a href="https://www.cbd.int/doc/world/be/be-nr-pa-en.pdf">https://www.cbd.int/doc/world/be/be-nr-pa-en.pdf</a> Walloon Legislation Portal – Nature and Forests <a href="https://environnement.wallonie.be/home/legislation/nature-et-forets.html">https://environnement.wallonie.be/home/legislation/nature-et-forets.html</a> Flemish Spatial and Environmental Codex <a href="https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1003183¶m=informatie">https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1003183¶m=informatie</a> Federal Belgian Legal Database <a href="http://www.ejustice.just.fgov.be">http://www.ejustice.just.fgov.be</a>
<b>Risk Rating justification</b>	<p>In Belgium, wetlands and low-productive forest areas are usually designated as nature protection areas, where conservation is the primary function and timber production is absent or strictly limited. These include peat bogs, marshes, wet heaths, and alluvial forests — habitats of high ecological value. While specific terms such as “low-productive” or “difficult to regenerate” are not be officially used in regional classifications, the management practices and legal frameworks reflect understanding of the ecological importance of these habitats. Consequently, many of these areas are protected under regional legislation and international frameworks. Belgium is a signatory to the Ramsar Convention (9 sites), and several sites are designated as wetlands of international importance, such as the Zwin (Flanders), Hautes Fagnes (Wallonia), and the Valley of the Haute-Sûre. Additionally, some of the areas are included in the Natura 2000 network, which protects threatened habitats and species.</p> <p>Nature reserves are widespread, particularly in areas with high water levels, poor soils, or exceptional biodiversity. Well-known examples include the Kalmthoutse Heide, Hageven-De Plateaux, and the Hohes Venn. Management in these reserves prioritises ecological restoration, including rewetting, invasive species control, and promoting natural forest dynamics. Deadwood is typically retained, and natural regeneration is encouraged to enhance biodiversity and carbon storage.</p> <p>These areas are managed by regional authorities, conservation agencies, and NGOs such as Natuurpunt in Flanders and Natagora in Wallonia. Private landowners may also participate, often with financial support for conservation measures.</p> <p>Forest Europe (formerly known as the Ministerial Conference on the Protection of Forests in Europe (MCPFE), is a pan-European policy process promoting sustainable forest management across 46 countries and the EU. Its MCPFE classification system, used by Belgium for forest reporting, includes:</p> <ul style="list-style-type: none"> <li>- Class 1: Strict biodiversity protection, no harvesting;</li> <li>- Class 2: Conservation with limited harvesting;</li> <li>- Class 3: Protection functions (e.g. water, soil), with restricted use.</li> </ul> <p>In Belgium, approximately 7.7% of forests are designated for biodiversity conservation under MCPFE Classes 1 and 2, which typically involve minimal or no harvesting activities. Additionally, nearly 24% of Belgian forests are designated as having protection functions under MCPFE Class 3, which may also have restrictions on harvesting to maintain their protective roles. These figures indicate that a significant portion of Belgium's forest area is under some form of protection with limited harvesting.</p>

	<p>Regarding usual forest areas, in Flanders, the Forest Decree (Bosdecreet) applies. It allows for differentiated management, including non-intervention zones or natural regeneration, especially in ecologically sensitive parts. Enforcement lies with the Agency for Nature and Forests (Agentschap voor Natuur en Bos).</p> <p>In Wallonia, the Code forestier governs forest use. At difficult sites, adapted silvicultural practices are recommended, with oversight by the Département de la Nature et des Forêts (DNF).</p>
<b>Risk Rating</b>	Specified Risk

Belgium European area	Indicator
<b>3.2.3</b>	feedstock shall not be sourced from forest areas in the Supply Base which, according to local definitions or norms, are classified as having combined attributes of high carbon stocks and high conservation value (HCV).
<b>Supply Base Verifiers</b>	<ul style="list-style-type: none"> <li>• International conventions ratified</li> <li>• Laws and regulations, authorities, and law enforcement</li> <li>• Internet research into this issue and critical opinions</li> </ul> <p>EUNIS Habitat Type: European Dry Heaths (4030)  <a href="https://eunis.eea.europa.eu/habitats/10185">https://eunis.eea.europa.eu/habitats/10185</a>  EUNIS Habitat Type: Northern Atlantic Wet Heaths with Erica tetralix (4010)  <a href="https://eunis.eea.europa.eu/habitats/10187">https://eunis.eea.europa.eu/habitats/10187</a>  Natura 2000 Vlaanderen – Habitat Types Overview  <a href="https://natura2000.vlaanderen.be/habitattypes?categorie=162">https://natura2000.vlaanderen.be/habitattypes?categorie=162</a>  Geopunt Vlaanderen – Public Geospatial Portal  <a href="http://www.geopunt.be/">http://www.geopunt.be/</a>  Geoportail Wallonie – Regional Spatial Data Infrastructure  <a href="https://geoportail.wallonie.be/home.html">https://geoportail.wallonie.be/home.html</a>  See also indicators 2.1.1, 2.1.2, 2.1.3, 2.2.1, 3.2.1, 3.3.1 and 4.2.3</p>
<b>Risk Rating justification</b>	<p>For carbon stocks criteria, see Indicators: 2.2.1, 3.2.1 and 3.3.1.  For HCV criteria, see Indicators: 1.1, 1.2, 1.3 and 4.2.3  Forest areas with attributes of both high carbon stocks and high conservation value — such as old-growth forests — are typically designated as protected areas where harvesting is absent or strictly limited.  Examples include core zones of ancient woodland in the Sonian Forest, part of which lies in Brussels and is listed as a UNESCO World Heritage Site for its undisturbed beech forest. Brussels also protects other old woodlands, such as Dieleghem Wood and Laerbeek Wood, under strict conservation regimes managed by Brussels Environment (Leefmilieu Brussel). These forests are part of the Natura 2000 network. Belgium has 312 Natura 2000 areas, covering around 13% of the national territory, including many forest habitats of high ecological value. Forestry operations in these zones must comply with conservation objectives defined in site-specific management plans.  In Flanders, protected forests are managed by the Agentschap voor Natuur</p>

	<p>en Bos; in Wallonia, by the Département de la Nature et des Forêts (DNF). NGOs such as Natuurpunt and Natagora also manage high conservation value forests, often under approved nature management plans. Outside protected areas, sustainable forestry is mandated by law. The Forest Decree (Bosdecreet) and Nature Decree in Flanders, the Code forestier and Code de l'environnement in Wallonia, and specific ordinances in the Brussels-Capital Region apply. If remnants of old-growth or high conservation value forest are encountered they are subject to stricter measures. Strictly interpreted, this indicator prohibits all sourcing from forest areas with both high carbon stocks and high conservation value (HCV), such as old-growth or near-natural forests. In Belgium, these areas are often subject to strong legal protection and are not managed for timber production. Where management does occur, it is typically conservation-oriented and regulated through site-specific objectives that prioritise ecological integrity. The Belgian legislative and regulatory frameworks—supported by inventories, mapping, and monitoring—are designed to prevent practices that would lead to significant carbon stock depletion, net greenhouse gas emissions, or the loss of conservation values. Protected areas, Natura 2000 sites, and zones with formal nature designations offer an additional safeguards. Interventions in such areas typically involve low-impact maintenance measures, such as the removal of invasive species. These generate biomass, without compromising long-term carbon storage or biodiversity objectives. However, there could still be remnants of high carbon stock and high conservation value forests outside protected zones, or cases where exceptions apply. As such, verifying compliance with this indicator remains important.</p>
<b>Risk Rating</b>	Specified Risk

Belgium European area	Indicator
<b>3.3.1</b>	Feedstock sourcing shall be in compliance with the principles of cascading use, high quality stem wood shall not be used as feedstock if it is in substantial demand for long-lived products in the Supply Base.
<b>Supply Base Verifiers</b>	<ul style="list-style-type: none"> <li>• Government regulation of the market.</li> <li>• Legislation on traded products.</li> <li>• Alternative markets and sales opportunities.</li> <li>• Internet research into the issue in practise.</li> <li>• Interviews with stakeholders on the market.</li> </ul> <p>Fern - Will Flemish Government's Move to Withdraw Biomass Subsidies Set an Example?  <a href="https://www.fern.org/publications-insight/belgium-will-flemish-governments-move-to-withdraw-biomass-subsidies-set-an-example-255/">https://www.fern.org/publications-insight/belgium-will-flemish-governments-move-to-withdraw-biomass-subsidies-set-an-example-255/</a>            IEA Bioenergy Country Report 2024 – Belgium  <a href="https://www.ieabioenergy.com/wp-content/uploads/2024/12/CountryReport2024_Belgium_final.pdf">https://www.ieabioenergy.com/wp-content/uploads/2024/12/CountryReport2024_Belgium_final.pdf</a></p>

	<p>European Commission – Sustainable Wood for a Sustainable World  <a href="https://op.europa.eu/en/publication-detail/-/publication/9b823034-ebad-11e8-b690-01aa75ed71a1">https://op.europa.eu/en/publication-detail/-/publication/9b823034-ebad-11e8-b690-01aa75ed71a1</a></p> <p>IEA Bioenergy Task 40 – Cascading Use of Biomass 2016  <a href="https://task40.ieabioenergy.com/wp-content/uploads/sites/6/2013/09/t40-cascading-2016.pdf">https://task40.ieabioenergy.com/wp-content/uploads/sites/6/2013/09/t40-cascading-2016.pdf</a></p> <p>WWF – Cascading Use of Wood Products Report  <a href="https://www.wwf.eu/?263091/Cascading-use-of-wood-products-report">https://www.wwf.eu/?263091/Cascading-use-of-wood-products-report</a></p> <p>OVAM – Circulair Materialenverhaal: Vlaamse Consumptievoetafdruk  <a href="https://ovam.vlaanderen.be/nl/w/circulair-materialenverhaal-hoe-de-vlaamse-consumptievoetafdruk-verlagen-?ssa">https://ovam.vlaanderen.be/nl/w/circulair-materialenverhaal-hoe-de-vlaamse-consumptievoetafdruk-verlagen-?ssa</a></p> <p>OVAM – Action Plan on Food Loss and Biomass (2021–2025)  <a href="https://ovam.vlaanderen.be/documents/177281/0/Actieplan+voedselverlies+en+biomassa+2021-2025+EN_.pdf">https://ovam.vlaanderen.be/documents/177281/0/Actieplan+voedselverlies+en+biomassa+2021-2025+EN_.pdf</a></p>
<b>Risk Rating justification</b>	<p>The cascading principle advocates prioritizing material uses of wood before energy applications to maximize resource efficiency and environmental benefits.</p> <p>The European Union (EU) has recognized challenges and is working to promote the cascading use of wood. Reports by organizations like the World Wide Fund for Nature (WWF) highlight the need for efficient wood utilization to meet projected demand and reduce pressure on forests. These reports call for regulatory frameworks that prioritize value-adding non-fuel uses of wood. The European Panel Federation (EPF) has commended EU legislation that encourages cascading use and restricts subsidies for burning industrial-grade roundwood.</p> <p>The International Energy Agency (IEA) is an intergovernmental organisation that provides data, analysis, and policy recommendations on global energy issues, including bioenergy through its IEA Bioenergy programme. The IEA also promotes the cascading use of biomass as a preferred approach, which can be considered non-binding policy advice for national authorities. The report “Implementation of bioenergy in Belgium – 2024 update” states that Flanders is doing research into the cascading principles in which non-energy applications are favoured. However, even if Flanders would solve this issue, demand for certified biomass comes from several European countries.</p> <p>In Belgium and neighbouring countries, the timber and paper industries are well-established, creating substantial demand for high-quality stem wood for valuable products. However, subsidies for biomass can disrupt the usual hierarchy, potentially diverting wood away from traditional industries. Besides, the price for energy in general has increased significantly due to sanctions on fossil fuels (and wood) from Russia and Belarus.</p> <p>In Belgium, renewable energy policies are primarily managed at the regional level. The three regions (Flanders, Wallonia, and the Brussels- Region) have implemented various measures, including investment subsidies and green certificates, to support renewable energy projects. Additionally, the federal government provides tax incentives.</p> <p>Despite these efforts, concerns persist about market distortions due to biomass subsidies. Today, the government addresses this by consulting with industry federations like Fedustria and Cobelpa to ensure that timber suitable</p>



	for material applications isn't redirected to energy production. Consequently, green energy certificates are not issued for timber flows that serve as raw materials for these industries.
<b>Risk Rating</b>	Specified Risk

Belgium European area	Indicator
<b>4.1.1</b>	Freedom of association and the right to collective bargaining shall be respected in the workplace.
<b>Supply Base Verifiers</b>	<ul style="list-style-type: none"> <li>• Laws and regulations, authorities and law enforcement</li> <li>• Internet research into the issue in practise</li> <li>• Standard employment contracts and interviews with employees</li> </ul> <p>International Labour Organization (ILO) – Main Website  <a href="http://www.ilo.org">http://www.ilo.org</a>  ILO Normlex – Belgium: Ratified Conventions and Legal Status  <a href="https://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102560">https://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102560</a>  ILO – Report on Migrant Workers’ Rights and Protections in Belgium  <a href="https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@ed_protect/@protrav/@migrant/documents/publication/wcms_883446.pdf">https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@ed_protect/@protrav/@migrant/documents/publication/wcms_883446.pdf</a>  World Bank – Worldwide Governance Indicators  <a href="https://www.worldbank.org/en/publication/worldwide-governance-indicators">https://www.worldbank.org/en/publication/worldwide-governance-indicators</a>  ITUC – 2024 Global Rights Index  <a href="https://www.ituc-csi.org/IMG/pdf/2024_ituc_global_rights_index_en.pdf?31226/ce28bb2139c2fe0d4e5f0a36d726ac7334d1c2d9be8b29dd88b4d2b9d89f5654">https://www.ituc-csi.org/IMG/pdf/2024_ituc_global_rights_index_en.pdf?31226/ce28bb2139c2fe0d4e5f0a36d726ac7334d1c2d9be8b29dd88b4d2b9d89f5654</a>  U.S. Department of State – 2023 Human Rights Report: Belgium  <a href="https://www.state.gov/reports/2023-country-reports-on-human-rights-practices/belgium/">https://www.state.gov/reports/2023-country-reports-on-human-rights-practices/belgium/</a>  ETUC – Bodson and Others v. Belgium (Trade Union Conviction Judgment)  <a href="https://etuclex.etuc.org/sites/default/files/2025-01/judgment_bodson_and_others_v._belgium_-_case_involving_trade-union_members_convicted_of_maliciously_obstructing_road_traffic_0.pdf">https://etuclex.etuc.org/sites/default/files/2025-01/judgment_bodson_and_others_v._belgium_-_case_involving_trade-union_members_convicted_of_maliciously_obstructing_road_traffic_0.pdf</a>  Belgian Labour Law – Law of 4 August 1996 on Well-being of Workers  <a href="https://werk.belgie.be/nl/wet-van-4-augustus-1996-betreffende-het-welzijn-van-de-werknemers-bij-de-uitvoering-van-hun-werk">https://werk.belgie.be/nl/wet-van-4-augustus-1996-betreffende-het-welzijn-van-de-werknemers-bij-de-uitvoering-van-hun-werk</a>  Belgian Labour Law – Law of 5 December 1968 on Collective Labour Agreements  <a href="https://werk.belgie.be/sites/default/files/content/documents/Paritaire%20comit%C3%A9s%20en%20CAO's/Regelgeving/Wet%2005121968.pdf">https://werk.belgie.be/sites/default/files/content/documents/Paritaire%20comit%C3%A9s%20en%20CAO's/Regelgeving/Wet%2005121968.pdf</a>  Belgian Labour Law – Law of 17 March 1987 on Annual Holidays  <a href="https://www.ejustice.just.fgov.be/eli/wet/1987/03/17/1987012264/justel">https://www.ejustice.just.fgov.be/eli/wet/1987/03/17/1987012264/justel</a>  Belgian Labour Law – Law of 16 March 1971 on Work Regulation  <a href="https://www.ejustice.just.fgov.be/eli/wet/1971/03/16/1971031602/justel">https://www.ejustice.just.fgov.be/eli/wet/1971/03/16/1971031602/justel</a>  MyCodex – Belgian Legal Viewer: Work Legislation</p>

	<p><a href="https://www.mycodex.be/viewer.php?id=142453">https://www.mycodex.be/viewer.php?id=142453</a>          Belgian Collective Labour Agreements – Overview of Parity Committees and CAOs  <a href="https://werk.belgie.be/nl/themas/paritaire-comites-en-collectieve-arbeidsovereenkomsten-caos/collectieve-4">https://werk.belgie.be/nl/themas/paritaire-comites-en-collectieve-arbeidsovereenkomsten-caos/collectieve-4</a></p>
<b>Risk Rating justification</b>	<p>Belgium has ratified all eight fundamental ILO conventions. The status on the ILO website for all eight conventions is 'in force'. The Belgian legislation on labour rights is conform to the European and international requirements. There is federal legislation in place that prescribes what requirements employers have to fulfil.</p> <p>Applicable legislation for the area under assessment covers the key principles recognized in the ILO Fundamental Principles and Rights at work (which are recognized as: freedom of association and right to collective bargaining; elimination of forced and compulsory labour; eliminations of discrimination in respect of employment and occupation; and effective abolition of child labour).</p> <p>The key legislative framework on most work related issues are on a federal level, for all Belgium sometimes the enforcement is on a regional level. The main collective bargaining regulations include:</p> <ul style="list-style-type: none"> <li>- The Belgian Constitution (Article 27): Guarantees the right to form associations, including trade unions.</li> <li>- The Act of 5 December 1968 on Collective Labour Agreements and Joint Committees: Governs collective bargaining at the sectoral level.</li> <li>- The Employment Contracts Act of 3 July 1978: Establishes rules concerning employment relations, including the right to union representation.</li> </ul> <p>Organizations and ministries responsible for the legal basis are responsible for Belgium on a Federal level:</p> <p>Federal Public Service Employment, Labour and Social Dialogue: Responsible for developing and implementing labour laws and policies, including those related to freedom of association and collective bargaining.</p> <p>National Labour Council (Conseil National du Travail / Nationale Arbeidsraad): A bipartite institution where employers' organizations and trade unions negotiate national collective agreements and advise the government on labour matters.</p> <p>Organisations responsibility for law enforcement for Belgium on a federal level:</p> <p>Federal Public Service Employment, Labour and Social Dialogue: Oversees the enforcement of labour laws, including those pertaining to freedom of association and collective bargaining.</p> <p>Labor Inspectorate: Ensures compliance with labour legislation by conducting inspections and addressing violations.</p> <p>For companies with more than 50 employees, the law provides workers the right to form and join independent unions of their choice without previous authorization or excessive requirements and to conduct legal strikes and bargain collectively. Workers in smaller companies are able to choose representatives to affiliate with a union, but do not enjoy the same level of protection.</p>

The law prohibits antiunion discrimination and provides for reinstatement of workers fired for union activity. Workers exercised these rights. Citizen and non-citizen workers enjoyed the same rights. Work council elections are mandatory in enterprises with more than 100 employees, and safety and health committee elections are mandatory in companies with more than 50 employees.

The 'paritaire' committees (PCs) are sectoral bodies set up with employer and employees on the basis of the Law of 5 December 1968 on collective agreements and joint committees. One of their assignment is concluding CAOs. Every four years, a call for candidate representative organizations for each 'paritaire' committee (PC) and subcommittee is published in the Belgian Official Gazette. The most recent social elections in Belgium were held between 13 and 26 May 2024. These sectoral agreements for collective labour agreements are established with the social partners of PC125 (wood industry), PC200 (clerical workers) and PC146 (forestry). No relevant violations were found of the laws or rights of free association and collective bargaining in relation to the forestry sector.

According to Human Rights Report of the USA Department of state (2022), Belgium continues to uphold its strong legal framework supporting freedom of association and the right to collective bargaining. Workers are generally able to form and join independent unions, conduct legal strikes, and engage in collective bargaining without significant hindrance. However, the report notes that employers sometimes resort to legal actions to prevent strikes, and courts have occasionally issued pre-emptive prohibitions against such actions. Additionally, while antiunion discrimination is prohibited by law, there have been instances where employers dismissed union representatives, opting to pay statutory severance instead of reinstatement. This practice has raised concerns among labour organizations regarding the effective protection of union activities.

In late 2023, a draft bill introduced by the Belgian Minister of Justice sought to restrict certain individuals convicted of specific offenses from participating in peaceful protests. Union leaders criticized this proposal, arguing that it threatened freedom of opinion and could undermine legitimate union activities. Thierry Bodson, President of the General Labour Federation of Belgium (FGTB-ABVV), expressed concerns that the bill posed a "danger to the right to freedom of opinion" and was potentially more detrimental to Belgian workers than "an attack on automatic wage indexation."

In practise, there are some violations of rights as reported in the IUTC 2024 report: the criminalisation of strikes and the stigmatisation of strikers in Belgium.

According to the IUTC report Belgium has prosecutions of union leaders: on 7 January 2020, the Court of Cassation of Belgium upheld the conviction of Bruno Verlaeckaert, president of the Antwerp branch of the Algemene Centrale (industry branch of ABVV-FGTB), for malignant obstruction of traffic during a general strike. While no individual act could be proven, the Court held Verlaeckaert responsible solely for his role in organising the strike. No penalty was imposed. On 15 January 2025, the European Court of Human Rights ruled in the case of Bodson and Others v. Belgium, addressing the criminal

	<p>conviction of union members for blocking a motorway during a strike. The Court examined whether the conviction infringed upon the applicants' right to freedom of association and collective bargaining. While the individuals were penalized for their participation in the strike action, no specific unlawful acts could be attributed to them personally. The ruling emphasized the delicate balance between maintaining public order and protecting workers' rights, setting an important precedent for labor disputes in Belgium.</p> <p>The ILO Report on Migrant Workers' Rights to Freedom of Association and Collective Bargaining (2023) highlights challenges faced by migrant workers globally, including Belgium. It emphasizes that while Belgium has robust labor laws, migrant workers often encounter barriers such as language difficulties, cultural differences, and limited access to union representation.</p> <p>Belgium maintains strong legal frameworks protecting freedom of association and collective bargaining, yet regional challenges persist. Wallonia has experienced more high-profile cases of union leader prosecutions, while Flanders faces similar legal ambiguities regarding strike actions.</p> <p>Belgium maintains a high governance score according to the World Bank Governance Index and continues to rank low in corruption levels. The country upholds strong institutional frameworks, ensuring transparency and accountability in labour rights enforcement.</p> <p><b>Comment Foronex</b></p> <p>Although the risk of compulsory labour in the forestry and wood sector in Belgium is considered low, Foronex remains vigilant and attentive to any suspicious labour-related situations within its supply chain.</p> <p>Our Corporate Social Responsibility Policy requires that human rights, national laws, international standards, and ethical norms are respected throughout the entire supply chain.</p> <p>With regard to the right to strike, we acknowledge that certain aspects of Belgian legislation and its enforcement could be improved. For example, Foronex does not support the dismissal of employees solely for their involvement in the organisation of strikes.</p> <p>Our company rejects all forms of discrimination, both within our company and across our supply chain. Foronex employs individuals from many countries, who work together as a team.</p>
<b>Risk Rating</b>	Low Risk

Belgium European area	Indicator
<b>4.1.2</b>	Forced or compulsory labour shall not be used.
<b>Supply Base Verifiers</b>	<ul style="list-style-type: none"> <li>• Laws and regulations, authorities, and law enforcement</li> <li>• Internet research into the issue of forced labour in practise</li> </ul> <p>Belgian Penal Code – Law of 17 April 1878 (Criminal Provisions)  <a href="https://www.ejustice.just.fgov.be/eli/wet/1878/04/17/1878041750/justel">https://www.ejustice.just.fgov.be/eli/wet/1878/04/17/1878041750/justel</a>            Belgian Law on Protection of Victims of Human Trafficking (15 December</p>

	<p>1980)  <a href="https://www.ejustice.just.fgov.be/eli/wet/1980/12/15/1980121550/justel">https://www.ejustice.just.fgov.be/eli/wet/1980/12/15/1980121550/justel</a>          Myria – 2023 Annual Report on Human Trafficking and Smuggling in Belgium  <a href="https://www.myria.be/files/2023_MYRIA_Annual_report_Trafficking_and_smuggling.pdf">https://www.myria.be/files/2023_MYRIA_Annual_report_Trafficking_and_smuggling.pdf</a>          ILO Brussels – Protecting Victims of Forced Labour and Human Trafficking in Belgium  <a href="https://www.ilo.org/wcmsp5/groups/public/---europe/---ro-geneva/---ilo-brussels/documents/publication/wcms_783904.pdf">https://www.ilo.org/wcmsp5/groups/public/---europe/---ro-geneva/---ilo-brussels/documents/publication/wcms_783904.pdf</a>          Human Rights Watch – Belgium Country Page  <a href="https://www.hrw.org/europe/central-asia/belgium">https://www.hrw.org/europe/central-asia/belgium</a>          U.S. Department of State – 2023 Trafficking in Persons Report: Belgium  <a href="https://www.state.gov/reports/2023-trafficking-in-persons-report/belgium/">https://www.state.gov/reports/2023-trafficking-in-persons-report/belgium/</a>          Council of Europe GRETA – 3rd Evaluation Report on Belgium (Anti-Trafficking)  <a href="https://rm.coe.int/3rd-greta-evaluation-report-on-belgium/1680a8940b">https://rm.coe.int/3rd-greta-evaluation-report-on-belgium/1680a8940b</a>          De Groote – Belgian Coalition Agreement: “Justice – Victims First”  <a href="https://degroote-deman.be/en/news/belgian-coalition-agreement-justice-victims-first/">https://degroote-deman.be/en/news/belgian-coalition-agreement-justice-victims-first/</a>          See also indicator 4.1.1.</p>
<b>Risk Rating justification</b>	<p>See indicator 4.1.1 on main aspects related to the ILO conventions, as well as federal and regional legislation and law-enforcement.</p> <p>Belgium ratified the 1930 Convention on Forced Labour (No. 29) in 1944. In 2019 Belgium also ratified the Forced Labour Convention Protocol of 2014. Belgian legislation on work rights is conform to the European and international requirements. The criminal code article 433quinquies prohibits all forms of forced or compulsory labour, as also human trafficking and human smuggling.</p> <p>Belgium has a federal service of labour inspection that carries out inspections and checks compliance with aspects like permits, insurances and working conditions. These labour inspectors have a formal obligation to report to immigration authorities migrant workers in an irregular situation (if they are not detected as potential trafficking victims), if they come across them during workplace inspections. Compliance with aspects like taxes and social security contributions are checked by the tax office.</p> <p>According to the U.S. Department of State's 2023 Trafficking in Persons Report, the Belgium government generally enforces labour laws, though resource allocation and the efficacy of inspections and remediation efforts can vary. Legal penalties, including fines and imprisonment, are generally commensurate with other serious crimes. Instances of forced and compulsory labour persist, affecting primarily vulnerable individuals, including undocumented migrants, who are exploited in sectors such as restaurants, bars, retail, horticulture, cleaning businesses, agriculture, and construction." Most employees can be found with the large forest owners and harvesting companies, including government institutions and nature conservation organizations. Generally, specialized contractors and/or freelancers are hired to do harvesting work. It is not common to employ labourers on a temporary basis, except contractors and freelancers. It is, however, unlikely that fraud or</p>

	<p>abuse in relation to foreign labourers or seasonal workers would occur in the Belgian forestry sector, as skilled permanent staff and/or specialized contractors are hired instead of unskilled workers.</p> <p>Legally required documents or records are:</p> <ul style="list-style-type: none"> <li>- Register of personnel (or electronic 'dimona' declaration)</li> <li>- An individual bank account and payslip</li> <li>- Work contracts, including agreements for flexible employment or employment as student or apprentice</li> <li>- Foreign workers (not citizens of countries of the European Economic Area and Switzerland) need a work permit ('arbeidskaart' / 'permis de travail').</li> </ul> <p>The buyer of wood from public forests shall identify the company/individuals carrying out the harvesting operations. For harvesting in military areas, an attendance register is required.</p> <p>The Interfederal Center for Migration (Myria) reported (2023) that undocumented migrants vulnerable to labour exploitation work mainly in the sectors construction, agriculture, and hospitality. These sectors are often characterized by precarious working conditions and a high presence of vulnerable workers.</p> <p>According to GRETA (Council of Europe's Group of Experts on Action against Trafficking in Human Beings), Belgium should review facilitating access to legal aid for victims of intentional acts of violence. The Belgian government's 2025 agreement prioritizes a victim-centred justice system, aiming to enhance protection and streamline information delivery. This commitment includes the implementation of more efficient support mechanisms for victims and their families.</p>
<b>Risk Rating</b>	Low Risk

Belgium European area	Indicator
<b>4.1.3</b>	Child labour shall not be used.
<b>Supply Base Verifiers</b>	<ul style="list-style-type: none"> <li>• Laws and regulations, authorities, and law enforcement</li> <li>• Internet research into the issue of child labour in practise</li> </ul> <p>Belgian Penal Code – Law of 3 July 1978 (Employment Contracts)  <a href="https://www.ejustice.just.fgov.be/eli/wet/1978/07/03/1978070303/justel">https://www.ejustice.just.fgov.be/eli/wet/1978/07/03/1978070303/justel</a>            Royal Decree of 3 May 1999 – Protection of Young Workers  <a href="https://www.ejustice.just.fgov.be/eli/besluit/1999/05/03/1999012069/justel">https://www.ejustice.just.fgov.be/eli/besluit/1999/05/03/1999012069/justel</a>            U.S. Department of State – 2023 Country Report on Human Rights Practices: Belgium  <a href="https://www.state.gov/reports/2023-country-reports-on-human-rights-practices/belgium/">https://www.state.gov/reports/2023-country-reports-on-human-rights-practices/belgium/</a>            Federal Law on Child Labour of 5 August 1992 – RAGAS Compendium 2023 (PDF)  <a href="https://ragas.online/wp-content/uploads/2023/10/COMPENDIUM-2023-BELGIUM.pdf">https://ragas.online/wp-content/uploads/2023/10/COMPENDIUM-2023-BELGIUM.pdf</a>            Evaluation Summary – Integration of Decent Work into Value Chains</p>



	<p>(Belgium, 2023)  <a href="https://diplomatie.belgium.be/sites/default/files/2023-11/Evaluation-Decent-Work-Summary-EN_1.pdf">https://diplomatie.belgium.be/sites/default/files/2023-11/Evaluation-Decent-Work-Summary-EN_1.pdf</a>  ILO Brussels – Country Information: Belgium  <a href="https://www.ilo.org/brussels/countries/belgium/lang--en/index.htm">https://www.ilo.org/brussels/countries/belgium/lang--en/index.htm</a>  UNICEF – Global Data on Child Labour  <a href="https://data.unicef.org/topic/child-protection/child-labour/">https://data.unicef.org/topic/child-protection/child-labour/</a>  Codex on Well-being at Work  <a href="https://werk.belgie.be/nl/themas/welzijn-op-het-werk/algemene-beginselen/codex-over-het-welzijn-op-het-werk">https://werk.belgie.be/nl/themas/welzijn-op-het-werk/algemene-beginselen/codex-over-het-welzijn-op-het-werk</a>  Belgian Labour Regulation – Youth Workers  <a href="https://werk.belgie.be/nl/themas/arbeidsreglementering/jeugdige-werknemers">https://werk.belgie.be/nl/themas/arbeidsreglementering/jeugdige-werknemers</a>  Global March Against Child Labour  <a href="https://globalmarch.org/">https://globalmarch.org/</a>  UNICEF – Child Labour Data and Research  <a href="https://data.unicef.org/topic/child-protection/child-labour/#">https://data.unicef.org/topic/child-protection/child-labour/#</a>  ACLVB – Sector PC146: Wages and Working Conditions  <a href="https://www.aclvb.be/nl/pc-146-loon-en-arbeidsvoorwaarden#loon--en-arbeidsvoorwaarden">https://www.aclvb.be/nl/pc-146-loon-en-arbeidsvoorwaarden#loon--en-arbeidsvoorwaarden</a>  See also indicator 4.1.1 and 4.1.2</p>
<b>Risk Rating justification</b>	<p>See indicator 4.1.1 and 4.1.2 on main aspects related to the ILO conventions, as well as federal and regional legislation and law-enforcement.</p> <p>Belgian minimum employment age is regulated by national instruments:</p> <ul style="list-style-type: none"> <li>- Law of 3 July 1978 (Employment Contracts): This foundational law sets general employment contract principles, including those for young workers, forming the core of Belgian labor code.</li> <li>- Royal Decree of 3 May 1999 (Young Worker Protection): This decree details protections for young workers, restricting work activities and regulating hours to safeguard their well-being and education.</li> <li>- Student Employment Regulations: Specific rules govern student work, including contract requirements, social contributions, and hour limitations, with recent minimum age adjustments</li> </ul> <p>The minimum age of employment is 15 years. People between the ages of 15 and 18 years may participate in part-time work/study programs and work full time up to a limited number of hours during the school year. They are not allowed to work more than 8 hours a day, and 38 hours a week, and the time they spend on their training counts as working time.</p> <p>The Ministry of Employment regulated industries that employ juvenile workers to ensure that labour laws were followed; it occasionally grants waivers for children temporarily employed by modelling agencies and in the entertainment business. The law clearly defines, according to the age of the child, the maximum amount of time that may be worked daily and the frequency of performances. The Federal Public Service Justice oversees the judicial aspects of enforcing laws against child labour.</p> <p>The forestry Collective Labour Agreement (CLA) for Forestry (PC146) does indicate the payment levels (coefficient of full payment) for employees of 16 and 17 year old.</p>

	<p>According to Human Rights Report of the USA Department of state (2023) the Belgian law prohibits the worst forms of child labour, and the government generally enforces these laws. Enforcement includes inspections, though resource allocation and effectiveness may vary. Penalties for violations of child labour laws are aligned with other serious crimes. While the report does not specifically highlight restaurants as a primary area of concern as in previous reports, it emphasizes the importance of continued vigilance and effective enforcement across all sectors.</p> <p>There are several international organisations and NGOs that study the issue of child labour. No references were found regarding child labour in the forest sector of Belgium (in this century).</p>
<b>Risk Rating</b>	Low Risk

Belgium European area	Indicator
<b>4.1.4</b>	Workers shall not be discriminated in hiring, remuneration, access to training, promotion, termination or retirement.
<b>Supply Base Verifiers</b>	<ul style="list-style-type: none"> <li>• Laws and regulations, authorities, and law enforcement</li> <li>• Internet research into the issue of discrimination in practise</li> <li>• Employment procedures and interviews with employees</li> </ul> <p>Anti-Discrimination Law of 10 May 2007  <a href="https://etaamb.openjustice.be/nl/wet-van-10-mei-2007_n2007002099.html">https://etaamb.openjustice.be/nl/wet-van-10-mei-2007_n2007002099.html</a>            Gender Mainstreaming Law of 12 January 2007 (consolidated by IGVM)  <a href="https://igvm-iefh.belgium.be/sites/default/files/downloads/Wet_gender_%20mainstreaming.pdf">https://igvm-iefh.belgium.be/sites/default/files/downloads/Wet_gender_%20mainstreaming.pdf</a>            Racism and Xenophobia Law of 30 July 1981  <a href="https://www.ejustice.just.fgov.be/img_l/pdf/1981/07/30/1981001359_N.pdf">https://www.ejustice.just.fgov.be/img_l/pdf/1981/07/30/1981001359_N.pdf</a>            UNIA – Legal Lexicon on Discrimination (Updated)  <a href="https://www.unia.be/files/Documenten/Wetgeving/Lexicon_discriminatie_112019.pdf">https://www.unia.be/files/Documenten/Wetgeving/Lexicon_discriminatie_112019.pdf</a>            U.S. Department of State – 2023 Human Rights Report: Belgium  <a href="https://www.state.gov/reports/2023-country-reports-on-human-rights-practices/belgium/">https://www.state.gov/reports/2023-country-reports-on-human-rights-practices/belgium/</a>            European Institute for Gender Equality – Gender Equality Index 2024: Belgium  <a href="https://eige.europa.eu/gender-equality-index/2024/BE">https://eige.europa.eu/gender-equality-index/2024/BE</a>            OECD – Gender Equality in Belgium (updated portal)  <a href="https://www.oecd.org/en/topics/gender-equality.html">https://www.oecd.org/en/topics/gender-equality.html</a>            PwC Belgium – 2023 Gender Pay Gap Report  <a href="https://press.pwc.be/belgium-closes-gender-pay-gap-to-45-but-gender-inequality-remains-high">https://press.pwc.be/belgium-closes-gender-pay-gap-to-45-but-gender-inequality-remains-high</a>            See also indicator 4.1.1, 4.1.2 and 4.1.3</p>
<b>Risk Rating justification</b>	See indicator 4.1.1, 4.1.2 and 4.1.3 on main aspects related to the ILO conventions, as well as federal and regional legislation and law-enforcement.

In Belgium, discrimination is prohibited by law and is punishable by law. A judge can order a discriminating person to compensate the victim for the damage suffered.

The relevant legislation:

- Anti-Discrimination Law of 10 May 2007: Prohibits direct and indirect discrimination based on 13 protected criteria, including age, sexual orientation, civil status, birth, wealth, religious or philosophical belief, political opinion, language, current or future state of health, disability, physical or genetic characteristic, and social origin.
- Gender Law of 10 May 2007: Specifically addresses discrimination based on gender, including provisions related to pregnancy and childbirth.
- Racism and Xenophobia Law of 30 July 1981: Targets discrimination based on race, colour, descent, or national or ethnic origin.
- Laws of 5 March 2002: Prohibit discrimination against fixed-term and part-time employees, ensuring equal treatment regardless of employment contract type.

Those facing or witnessing discrimination within Belgium are encouraged to contact the Interfederal Centre for Equal Opportunities (UNIA) and the Institute for Equality between Women and Men, both of which provide rights advice and potential solutions. In 2023, UNIA recorded a consistently high number of discrimination complaints, indicating persistent societal issues.

While precise annual percentage increases may vary, the overall trend demonstrates a sustained level of reported discrimination, with particular concentrations in employment and housing sectors.

The anti-discrimination legislation is not applicable in cases qualified as harassment in the workplace. In such situations, the legislation on well-being at work is applicable. Therefore, in a case where the discrimination also constitutes harassment, the victim may choose the grounds on which he/she wants to start a law suit. If it is based on the legislation on well-being at work, the anti-discrimination legislation will not apply.

Labour laws and regulations related to employment or occupation prohibit discrimination based on race, sex, gender, disability, language, sexual orientation or gender identity, HIV-positive status or other communicable diseases, or social status, but permit companies to prohibit outward displays of religious affiliation, including headscarves.

The law requires companies with at least 50 employees to provide a clear overview of their compensation plans, a detailed breakdown by gender of their wages and fringe benefits, a gender-neutral classification of functions, and the possibility of appointing a mediator to address and follow up on gender-related problems. The law requires that one-third of the board members of publicly traded companies be women.

According to the U.S. Department of State's 2023 Human Rights Report, the Employment and Labour Relations Federal Public Service continued to generally enforce labour regulations effectively, with penalties commensurate with similar violations. Federal and regional government ombudsmen maintained oversight, publishing reports on agency operations within their respective jurisdictions. UNIA remained a central entity responsible for promoting equal opportunity and combating discrimination across all levels of

	<p>government (federal, regional, provincial, and local). The report affirms UNIA's continued high level of public trust, its independent functioning, and its adequate government funding, allowing it to effectively carry out its mandated responsibilities.</p> <p>Established in 2020, the Federal Institute of Human Rights serves as a complementary body, intervening when existing agencies like UNIA and Myria do not address specific human rights concerns. Its mandate focuses on providing recommendations to federal governmental bodies, ensuring adherence to international human rights treaties. While currently operating at the federal level, the institute aims to expand its reach through interfederal cooperation agreements with regional authorities, facilitating a more comprehensive human rights framework..</p> <p>According to the European Institute for Gender Equality, Belgium's Gender Equality Index score in 2024 is 76.1. Belgium continues to score highly in Europe concerning earnings and gender equality. The OECD reports Belgium's gender pay gap as one of the lower in Europe, at 4.5%. This remains significantly lower than the EU average. Recent Belgian statistical data indicates nuances within sector specific gender pay gap data. Particularly, the idea that on an hourly basis, women earn more than men in the Public sector is a complex statistical matter, and needs very specific context to be accurate, and is not a general overview of the entirety of the Belgian economy. The main consensus is that a pay gap does exist in Belgium.</p>
<b>Risk Rating</b>	Low Risk

Belgium European area	Indicator
<b>4.1.5</b>	Wages paid to workers shall meet or exceed the legal minimum wage or where there is no statutory minimum wage industry norms shall be met or exceeded
<b>Supply Base Verifiers</b>	<ul style="list-style-type: none"> <li>• Laws and regulations, authorities, and law enforcement</li> <li>• Internet research into issues with wages in practise</li> <li>• Employment contracts and interviews with employees</li> </ul> <p>Federal Public Service Employment – Wages in Belgium  <a href="https://werk.belgie.be/nl/themas/verloning/loon">https://werk.belgie.be/nl/themas/verloning/loon</a>            ACLVB – Joint Committee 146: Wages and Working Conditions  <a href="https://www.aclvb.be/nl/pc-146-loon-en-arbeidsvoorwaarden#loon--en-arbeidsvoorwaarden">https://www.aclvb.be/nl/pc-146-loon-en-arbeidsvoorwaarden#loon--en-arbeidsvoorwaarden</a>            Minimum Wage Database – Belgium's Joint Committees  <a href="https://www.minimumlonen.be/jc_overview.html">https://www.minimumlonen.be/jc_overview.html</a>            ITUC Legal Database – Labour Rights in Belgium  <a href="https://www.ituc-csi.org/spip.php?page=legal_info&amp;cc=BEL&amp;lang=en">https://www.ituc-csi.org/spip.php?page=legal_info&amp;cc=BEL&amp;lang=en</a>            See also indicator 4.1.1, 4.1.2 and 4.1.4.</p>
<b>Risk Rating justification</b>	See also indicator 4.1.1, 4.1.2 and 4.1.4 on main aspects related to the ILO conventions, as well as federal, regional legislation and law-enforcement. Wage rates and labour conditions are agreed upon directly with the employer,

	<p>through collective bargaining, or other means of negotiation. Inspectors from both the Ministry of Labour and the Ministry of Social Security enforce labour regulations. These ministries cooperate to ensure that wages and working conditions are consistent with the collective bargaining agreements.</p> <p>In Belgium, minimum wages and employment conditions are determined in the collective labour agreements (CLAs) concluded in the 'paritaire' committees (PCs). The sectoral agreements for collective labour agreements are established with the social partners of PC125 (wood industry), PC200 (clerical workers) and PC146 (forestry).</p> <p>For industries that don't have a minimum wage set by their committees, the nationwide Belgian minimum wage applies. The minimum wages in Belgium operate on a monthly basis rather than an hourly one.</p> <p>Maximum working hours are stated in the Law of 17 March 1987 on the introduction of new working arrangements in companies, to allow for the extension or adjustment of operating time in the company, the Labour Law of March 16, 1971 and the Law of January 4, 1974 on public holidays.</p> <p>The standard regime is 38 hours per week. Employees are entitled to four weeks of annual leave. Departure from these norms can occur under a collective bargaining agreement, but work may not exceed 11 hours per day or 50 hours per week. The forestry collective labour agreement (PC146) states the standard 38 hours, and lists, for example, under which (personal) circumstances an employee is entitled to a day or few days leave. In addition, daily work should be done between 6 am and 8 pm (because of the ban on night work). A rest period of at least 11 hours is required between work periods. Overtime is paid at a time-and-a-half premium on Monday through Saturday and double time on Sundays. The law forbids or limits excessive overtime. Without specific authorization, an employee may not work more than 65 hours of overtime during any one quarter. The Employment and Labour Relations Federal Public Service generally enforced wage and hour regulations effectively.</p> <p>The absolute lower limit for the wage is related to the guaranteed average minimum monthly income of the National Labour Council (NAR). The minimum wage databank contains an up-to-date overview of the applicable sectoral minimum wage scales. The database collects the gross wage data and adjusts it, as determined by the sectoral collective agreements (indexations and conventional wage increases). In addition to the wage scales, there are documents for each joint (sub)committee about the committee's area of competence, working hours, job classifications, seniority conditions, and premiums and allowances.</p> <p>There is an exclusion of certain matters from the scope of bargaining (e.g. wages, hours). The provisions of the Act of 26 July 1996 on the promotion of employment and the preventive safeguarding of competitiveness, as amended by the Act of 19 March 2017, lead to the setting of a maximum wage margin which severely limits the scope for collective bargaining and does not really allow for wage increases, not only at national level, but also at sectoral and company level.</p>
<b>Risk Rating</b>	Low Risk

Belgium European area	Indicator
<b>4.1.6</b>	Working hours shall comply with legal requirements.
<b>Supply Base Verifiers</b>	<ul style="list-style-type: none"> <li>• Laws and regulations, authorities, and law enforcement</li> <li>• Internet research into issues with working hours in practise</li> <li>• Standard employment contracts and interviews with employees</li> </ul> <p>Belgium.be – Employment Legislation Overview  <a href="https://www.belgium.be/en/work/employment_legislation">https://www.belgium.be/en/work/employment_legislation</a>            Federal Public Service Employment –Working Time and Rest Periods  <a href="https://employment.belgium.be/en/themes/international/posting/working-conditions-be-respected-case-posting-belgium/working-time-and">https://employment.belgium.be/en/themes/international/posting/working-conditions-be-respected-case-posting-belgium/working-time-and</a>            Belgian Social Security – LIMOSA Mandatory Declaration for Foreign Employers and Self-Employed  <a href="https://www.socialsecurity.be/site_nl/employer/applics/meldingsplicht/index.htm">https://www.socialsecurity.be/site_nl/employer/applics/meldingsplicht/index.htm</a>            See also indicator 4.1.1, 4.1.2, 4.1.4 and 4.1.5.</p>
<b>Risk Rating justification</b>	<p>See also indicator 4.1.1, 4.1.2, 4.1.4 on main aspects related to the ILO conventions, as well as federal, regional legislation and law-enforcement. See also indicator 4.1.5 on more specifics on legal working hours.</p> <p>In Belgium, the legal working week is 38 hours. Apart from the legal working week, enterprises may alter working time in line with their companies' requirements. Workers may work appropriately remunerated overtime.</p> <p>If the employer has filled in a LIMOSA ( A foreign employer (or his agent) who wants to post one of his workers to Belgium) declaration of posting, he is exempt for a period of 12 months from having to draw up the terms and conditions of employment as required by Belgian law. Nonetheless, it is reminded that, in the LIMOSA declaration of posting, the employer must specify the weekly hours of work and the work schedules that will be applicable during the workers' period of posting to Belgium. The LIMOSA declaration provides for information about the worker and the employer (place of employment, duration of posting, work schedule, etc.).</p>
<b>Risk Rating</b>	Low Risk

Belgium European area	Indicator
<b>4.1.7</b>	Workers shall have access to health care provisions, sickness benefits, retirement benefits, invalidity benefits, death benefits, and workers' compensation
<b>Supply Base Verifiers</b>	<ul style="list-style-type: none"> <li>• Laws and regulations.</li> <li>• Internet research on current practices.</li> <li>• Records of internal and external trainings of forest workers and sources.</li> <li>• Work place assessment results carried out by external company</li> </ul> <p>BeSWIC – Belgian Knowledge Centre for Occupational Well-being  <a href="http://www.beswic.be/">http://www.beswic.be/</a>            EU-OSHA – Belgium: National Focal Point</p>



	<p><a href="https://osha.europa.eu/en/about-eu-osha/national-focal-points/belgium">https://osha.europa.eu/en/about-eu-osha/national-focal-points/belgium</a></p> <p>Arbeidsongevallen in de Houtsector 2004</p> <p>ILO NATLEX – Labour and Employment Legislation: Belgium</p> <p><a href="https://www.ilo.org/dyn/natlex/natlex4.detail?p_lang=en&amp;p_isn=83515">https://www.ilo.org/dyn/natlex/natlex4.detail?p_lang=en&amp;p_isn=83515</a></p> <p>Belgian Social Security Portal</p> <p><a href="https://socialsecurity.belgium.be/en">https://socialsecurity.belgium.be/en</a></p> <p>SPW – Department of Nature and Forests (Wallonia)</p> <p><a href="https://spw.wallonie.be/administrations/spw-agriculture-ressources-naturelles-et-environnement/departement-de-la-nature-et-des-forets">https://spw.wallonie.be/administrations/spw-agriculture-ressources-naturelles-et-environnement/departement-de-la-nature-et-des-forets</a></p> <p>Fedris – Federal Agency for Occupational Risks</p> <p><a href="https://www.fedris.be/en/home.html">https://www.fedris.be/en/home.html</a></p> <p>Fedris – Annual Report 2022</p> <p><a href="https://www.fedris.be/sites/default/files/assets/NL/Jaarverslagen/jaarverslag_2022.pdf">https://www.fedris.be/sites/default/files/assets/NL/Jaarverslagen/jaarverslag_2022.pdf</a></p> <p>Fedris – Statistical Report 2023: Work Accidents in the Private Sector (Currently unpublished online; typically accessible via Fedris statistics page)</p> <p>See also indicator 4.1.1, 4.1.2, 4.1.4, 4.1.5, 4.1.6</p>
<b>Risk Rating justification</b>	<p>See also indicator 4.1.1, 4.1.2, 4.1.4, 4.1.5, 4.1.6 on main aspects related to the ILO conventions, as well as federal, regional legislation and law-enforcement.</p> <p>Belgium offers a legally enforced system that guarantees workers access to health care provisions, sickness benefits, retirement benefits, invalidity benefits, death benefits, and workers' compensation. The framework is based on national legislation, implemented through specialised federal agencies, and supported by targeted regional regulations relevant to the forestry sector.</p> <p><b>1. Health Care Provisions and Sickness Benefits</b></p> <p>All persons who work in Belgium, including those in the forestry sector, are covered by compulsory health insurance, managed by the National Institute for Health and Disability Insurance (NIHDI/INAMI-RIZIV). This federal institution ensures the reimbursement of medical expenses and provides income support during periods of illness or incapacity. Employers must register employees with a recognised sickness fund and pay the required contributions. Self-employed forestry workers must affiliate independently. The system is universal, and failure to comply results in penalties and loss of coverage.</p> <p>INAMI also administers Income Replacement Allowances for individuals whose earning capacity is significantly reduced due to disability. These allowances form part of the broader invalidity protection under national law.</p> <p><b>2. Retirement, Invalidity, and Death Benefits</b></p> <p>While not detailed extensively in forestry-specific legislation, retirement benefits are a standard element of Belgium's social security system. They are determined by the contributions made over a worker's lifetime and are processed through the National Pensions Office (RVP/ONP).</p> <p>Invalidity benefits are administered via INAMI, supporting workers unable to continue their occupation due to long-term illness or disability. Death benefits are provided to eligible dependants of deceased workers, offering a safety net</p>

in the event of premature death. These benefits ensure income continuity and are integral to Belgium's protection model.

### 3. Workers' Compensation and Occupational Risk Protection

The Federal Agency for Occupational Risks (Fedris), a federal public institution supervised by the Minister of Social Affairs and Health, administers workers' compensation schemes. Fedris ensures compensation for workplace accidents and occupational diseases, including: Medical treatment; Replacement income; Rehabilitation and reintegration services.

Accident data show that the forestry sector is not high-risk in Belgium. In the private forestry sector, incidents typically range between 1 and 3 annually, with some years reporting zero. In the public sector (agriculture, forestry, and fishery combined), educated workers report fewer than 10 injuries per year. For unschooled workers, incidents average 50 annually (33 in 2022).

Employers must report accidents to Fedris and the National Social Security Office (RSZ/ONSS). Compliance with accident registration, insurance, and contribution obligations is monitored via regular audits.

### 4. Occupational Safety and Well-being Regulations

Safety and well-being at work are governed by the Federal Public Service Employment, Labour and Social Dialogue. Within this FPS, the Directorate-General for Humanisation of Labour oversees the regulatory framework and coordination with social partners. Enforcement is conducted by the federal labour inspection agency (Arbeidsinspectie / Inspection du travail) and the unit Supervision of Well-being at Work, which monitors compliance with occupational safety, health standards, insurance coverage, working conditions, and permits.

Inspectors have legal authority to conduct unannounced inspections and impose corrective measures or sanctions. Companies employing at least 20 workers must maintain a training plan, keep records of all workplace (near-)accidents, and submit an annual report naming the person responsible for health and safety.

Employees have the legal right to remove themselves from dangerous work situations without risking their employment. However, the responsibility for identifying and assessing risks lies primarily with the employer and authorised inspectors.

### 5. Forestry Sector-Specific Measures

The forestry sector in Belgium is subject to additional regulatory measures that strengthen worker safety and competence:

The Flemish recognition scheme for harvesting companies (Erkenningsregeling exploitanten) requires mandatory training and certification before starting harvesting operations.

Safety requirements are explicitly included in the regional terms and conditions of public wood sales and, in some cases, large private forests. These conditions are formalised in the houtcatalogoog (Dutch) or cahier des charges (French).

Employers must instruct workers in safe work practices, including the correct

	<p>use of machinery and protective equipment. Special emphasis is placed on the safety of machine operators and those directly involved in harvesting.</p> <p>6. Administrative Oversight and Social Security Compliance Social security compliance in Belgium is ensured through mandatory employer declarations to the National Social Security Office (RSZ/ONSS), which calculates contributions and ensures prompt payment. Employers also manage sick leave procedures via the mutualities (health insurance funds) and keep detailed employee records for pension and invalidity entitlements. Audits are regularly conducted by Fedris and social security authorities to verify compliance.</p>
<b>Risk Rating</b>	Low Risk

Belgium European area	Indicator
<b>4.1.8</b>	Training shall be provided for all workers to allow them to implement the conditions set out in all elements of the SBP Standards relevant to their responsibilities.
<b>Supply Base Verifiers</b>	<ul style="list-style-type: none"> <li>• Laws and regulations.</li> <li>• Internet research on current practices.</li> <li>• Records of internal and external trainings of forest workers and sources</li> <li>• Employment contracts and interviews with employees</li> </ul> <p>Belgian Federal Public Service Justice – Act of 3 October 2022 Establishing a Basic Safety Training for Temporary or Mobile Construction Sites  <a href="https://www.ejustice.just.fgov.be/eli/wet/2022/10/03/2022206360/justel">https://www.ejustice.just.fgov.be/eli/wet/2022/10/03/2022206360/justel</a>  Employment Law Worldview – Belgium: Employee Training  <a href="https://www.employmentlawworldview.com/belgium-employee-training-you-need-a-plan-and-fast/">https://www.employmentlawworldview.com/belgium-employee-training-you-need-a-plan-and-fast/</a>  FOD Werkgelegenheid – Opleidingsplannen  <a href="https://werk.belgie.be/nl/themas/opleiding/opleidingsplannen">https://werk.belgie.be/nl/themas/opleiding/opleidingsplannen</a>  See also indicator 4.1.1, 4.1.2, 4.1.4, 4.1.5, 4.1.6 and 4.1.7</p>
<b>Risk Rating justification</b>	<p>SBP normative interpretation: While workers are not required to be familiar with the SBP requirements themselves, their training must equip them to perform their duties competently, safely, and in a manner that complies with the SBP standards.</p> <p>See indicator 4.1.1, 4.1.2, 4.1.4, 4.1.5, 4.1.6 and 4.1.7 on main aspects related to the ILO conventions, as well as federal, regional legislation and law-enforcement.</p> <p>The Belgian Labour Deal that was voted through in 2022 established an individual right to training. Full-time employees are entitled to a training credit of five days per year.</p> <p>Employers with at least 20 staff (full-time equivalents) are required to prepare an annual training plan, which must be drawn up and registered with the Ministry of Employment by 31 March of the year in question at the latest</p>

	<p>(though see below on this). The plan can cover the coming year only or it can be drawn up to reach several years into the future if the employees or their representatives agree.</p> <p>The plan should include at least the formal and informal training the company wants to offer its employees. It must specify the target group(s) for which each of these training courses are intended. In addition, the plan should also take into account the gender dimension (meaning that access to training should not depend directly or indirectly on the gender of employees, for example by focusing training efforts on categories of employees where female employees are underrepresented). The employer is required, to pay particular attention to certain specific target groups for whom access to the labour market is more difficult, such as employees above the age of 50, employees who were unemployed when they were recruited, employees with reduced working capacity, employees in a bottleneck job (i.e. one for which there is a shortage of candidates) and employees below the age of 26 in a dual learning program.</p> <p>If the company has a works council or trade union delegation, the draft training plan must be submitted to it for consultation, at least 15 days before any meeting with management to discuss the plan. The works council or union delegation must give its opinion by 15 March at the latest. While it is good practice for the employer to be seen to consider that opinion, it is not bound by it. The final content of the training plan must be adopted by 31 March.</p> <p>If there is no works council or union delegation, the training plan must be communicated to all employees by 15 March at the latest. There is in those circumstances no formal requirement for consultation but it still makes good sense to ask the employees if they have any views on the plan. The content of the training plan must again be finalised by 31 March.</p> <p>In principle, the plan should also be communicated to the Ministry of Employment, but how this is to be done in practice is yet to be determined by an appropriate Royal Decree, so for now, it is sufficient to keep a copy of the plan on company premises (or on the intranet).</p>
<b>Risk Rating</b>	Low Risk

Belgium European area	Indicator
<b>4.1.9</b>	Mechanisms shall be in place for resolving grievances and disputes in the workplace.
<b>Supply Base Verifiers</b>	<ul style="list-style-type: none"> <li>• Laws and regulations</li> <li>• Internet research into practical issues on solving dispute</li> </ul> <p>Federale Ombudsman België – Officiële Website  <a href="https://www.ombudsman.be/nl">https://www.ombudsman.be/nl</a>            CEPANI – Belgian Centre for Arbitration and Mediation  <a href="https://www.cepani.be/">https://www.cepani.be/</a>            Belgium.be – Organisation of Justice  <a href="https://www.belgium.be/en/justice/organisation">https://www.belgium.be/en/justice/organisation</a></p>

	<p>Belgium.be – Employment Legislation  <a href="https://www.belgium.be/en/work/employment_legislation">https://www.belgium.be/en/work/employment_legislation</a>          Belgium.be – Out-of-Court Dispute Resolution  <a href="https://www.belgium.be/en/justice/ways/conflict_resolution">https://www.belgium.be/en/justice/ways/conflict_resolution</a>          European e-Justice Portal – Out-of-Court Procedures in Belgium  <a href="https://e-justice.europa.eu/491/EN/out_of_court_procedures__practical_information?BELGIUM&amp;init=true">https://e-justice.europa.eu/491/EN/out_of_court_procedures__practical_information?BELGIUM&amp;init=true</a>          See also indicator 4.1.1, 4.1.2, 4.1.4, 4.1.5, 4.1.6, 4.1.7 and 4.1.8</p>
<b>Risk Rating justification</b>	<p>See also indicator 4.1.1, 4.1.2, 4.1.4, 4.1.5, 4.1.6, 4.1.7 and 4.1.8 on main aspects related to the ILO conventions, federal, regional legislation and law-enforcement.</p> <p>Main legislation and regulation on mechanisms for resolving grievances and disputes in the workplace:</p> <ul style="list-style-type: none"> <li>- Act on Private Investigations (2024): Establishes a strict regulatory framework for conducting workplace investigations, outlining employers' rights and limitations in investigating workplace incidents.</li> <li>- Anti-Discrimination Law of 10 May 2007: Prohibits discrimination based on 13 criteria, ensuring equal treatment and providing mechanisms for addressing grievances related to discrimination.</li> <li>- Whistleblowing Act (2022): Requires companies with at least 50 employees to establish internal reporting channels and procedures for reporting misconduct, including mechanisms for resolving related disputes.</li> </ul> <p>Organisations / ministries responsible for the legal basis:</p> <ul style="list-style-type: none"> <li>- Federal Public Service Employment, Labour and Social Dialogue (FPS Employment): Develops and enforces employment laws, including those related to dispute resolution mechanisms.</li> <li>- Federal Public Service Justice (FPS Justice): Oversees judicial aspects of dispute resolution, including court procedures and enforcement.</li> <li>- Centre for Arbitration and Mediation (CEPANI): Provides arbitration and mediation services to resolve commercial and civil disputes.</li> </ul> <p>The Belgium legislation also regulates questions related to grievances and disputes, including those relating to tenure and usage rights, forest management practices and work conditions.</p> <p>In the Belgian forest sector, grievances and disputes are rare.</p> <p>Landownership, land use rights, and civil and traditional rights are clearly determined and settled. Regarding forest management practices and occupational aspects, the duties and responsibilities of the involved parties are clearly defined in laws, regulations and sectoral agreements.</p> <p>Forest management plans are subject to stakeholder consultation prior to approval by the forest and nature administration and, in general, forest operations normally do not go unnoticed and local stakeholders have the possibility to express concerns. There are no indigenous people, or other people directly dependent on the forest for their livelihood.</p> <p>In Belgium various mechanisms exist on 'out-of-court' dispute settlement. Through negotiations, the opposing parties can try to find a satisfactory solution without going to court. The parties can ask (voluntarily) for the help (mediation, conciliation) of certain independent organisations, depending on</p>

	<p>the issue. In resolving labour disputes, the trade unions can assist in resolving disputes over working conditions. Prevailing practice is to include additional dispute resolution related statements in the working agreements. Regarding issues with public agencies or certain private services, one can, for example, contact the ombudsman.</p> <p>One can also go to court, the justice system is considered to be working properly. Belgium has a good governance score according to the World Bank Governance Index, and scores low on corruption according to Transparency international.</p> <p>In summary, Belgium has established a multifaceted framework for resolving grievances and disputes, encompassing legal regulations, employer obligations, and available dispute resolution mechanisms. Employers are legally obligated to implement these mechanisms, and employees have the right to access them.</p>
<b>Risk Rating</b>	Low Risk

Belgium European area	Indicator
<b>4.1.10</b>	Safeguards shall be put in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures.
<b>Supply Base Verifiers</b>	<ul style="list-style-type: none"> <li>• Laws and regulations, authorities, law-enforcement</li> <li>• Internet research into practical issues on solving dispute</li> </ul> <p>Settling in Belgium – Health and Safety at Work  <a href="https://settlinginbelgium.be/en/work-and-retirement/health-and-safety-at-work">https://settlinginbelgium.be/en/work-and-retirement/health-and-safety-at-work</a>            BeSWIC – Europees kettingzaagcertificaat verplicht in Vlaamse overheidsbossen vanaf 1 september 2019  <a href="https://beswic.be/nl/blog/het-europees-kettingzaag-certificaat-verplicht-vanaf-1-september-2019-bossen-van-de-vlaamse-overheid">https://beswic.be/nl/blog/het-europees-kettingzaag-certificaat-verplicht-vanaf-1-september-2019-bossen-van-de-vlaamse-overheid</a>            Koninklijk Besluit van 07/04/2023 – Basisveiligheidsopleiding voor tijdelijke of mobiele bouwplaatsen  <a href="https://www.ejustice.just.fgov.be/cgi_loi/change_lg.pl?language=nl&amp;la=N&amp;cn=2023040706&amp;table_name=wet">https://www.ejustice.just.fgov.be/cgi_loi/change_lg.pl?language=nl&amp;la=N&amp;cn=2023040706&amp;table_name=wet</a>            BeSACC-VCA – Veiligheidsopleiding en certificering voor aannemers  <a href="https://www.besacc-vca.be/">https://www.besacc-vca.be/</a>            FOD Werkgelegenheid – Arbeidsinspectie en inbreuken  <a href="https://werk.belgie.be/nl/over-de-fod/inbreuken/de-arbeidsinspectie">https://werk.belgie.be/nl/over-de-fod/inbreuken/de-arbeidsinspectie</a>            See also indicator 4.1.1, 4.1.2, 4.1.4, 4.1.5, 4.1.6, 4.1.7, 4.1.8 and 4.1.9.</p>
<b>Risk Rating justification</b>	<p>See indicator 4.1.1, 4.1.2, 4.1.4, 4.1.5, 4.1.6, 4.1.7, 4.1.8 and 4.1.9 on main aspects related to the ILO conventions, federal, regional legislation and law-enforcement.</p> <p>The main legislation dealing with occupational health and safety in Belgium is the Act of 1996 on the wellbeing of workers in the performance of their work, as subsequently amended. The Act states the following measures in relation to workers' wellbeing: work safety. protecting workers' health at work. The Royal Decree of 27 March 1998 outlines the internal and external services for</p>



	<p>prevention and protection at work, detailing the responsibilities of employers in implementing health and safety measures.</p> <p>In Belgium, a VCA certificate is not legally required for the forestry sector. VCA certification is a voluntary system that helps companies implement an effective safety management system. However, since 15 April 2023, a basic safety training course of at least eight hours has been mandatory in the construction sector for everyone working on temporary or mobile construction sites, including self-employed workers and employees from other sectors such as the metal and electrical industries. A valid VCA certificate may be considered equivalent in this context. Although this requirement specifically applies to the construction sector, completing a VCA training course can also contribute to improving workplace safety in the forestry sector.</p> <p>This obligation is established by the Royal Decree of 07/04/2023 establishing a basic safety training course for temporary or mobile construction sites and improving communication on temporary or mobile construction sites (Belgian Official Gazette, 13/04/2023)</p> <p>Furthermore relating to the Forest Decree Regulations: In Flanders, companies harvesting more than 50 m<sup>3</sup> per year must obtain official recognition from the forest administration, which includes requirements for training, safety at work, legal employment, and payment of taxes. Also in Flanders as of September 1, 2019, it is mandatory for anyone operating a chainsaw in Flemish public forests to possess the 'European Chainsaw Certificate' (ECC). The Agency for Nature and Forests (ANB) aims to enhance the safety of chainsaw operators and prevent accidents through this measure."</p> <p>The Federal Public Service (FPS) for Employment, Labour and Social Dialogue is the competent national authority for health and safety at work. It is responsible for preparing, promoting and implementing the policy for well-being at work. The Directorate-General for Humanisation of Labour is Responsible for regulatory affairs and promoting well-being at work. The Labour Inspection – Supervision of well-being at work: Ensures compliance with occupational safety, health, and well-being standards. The Forest Administrations: Oversee the recognition of companies involved in timber harvesting, ensuring adherence to safety and legal requirements.</p> <p>Each company is obliged to establish and communicate the company wide training plan which is described in 4.1.6. Safety training should be included in those plans.</p> <p>In summary, Belgium's forest industry is governed by a robust framework of legislation and regulations aimed at safeguarding workers' health and safety. Employers are mandated to develop, communicate, and implement comprehensive policies and procedures, supported by certification systems like VCA and BeSaCC, to ensure a safe working environment. Enforcement is carried out by various authorities, including the Labour Inspection and Forest Administrations, to uphold these standards.</p>
<b>Risk Rating</b>	Low Risk

European area	
4.2.1	Negative social and community impacts shall be identified and avoided.
Supply Base Verifiers	<ul style="list-style-type: none"> <li>• Ratification of international conventions on traditional and civil rights.</li> <li>• Legislation and regulations, authorities, law-enforcement</li> <li>• Internet research on into practical issues on solving disputes</li> </ul> <p>SGI Network – Belgium: Social Policies (2019)  <a href="https://www.sgi-network.org/2019/Belgium/Social_Policies">https://www.sgi-network.org/2019/Belgium/Social_Policies</a>  Youth Wiki – Belgium (Flemish Community): General Context  <a href="https://national-policies.eacea.ec.europa.eu/youthwiki/chapters/belgium-flemish-community/41-general-context">https://national-policies.eacea.ec.europa.eu/youthwiki/chapters/belgium-flemish-community/41-general-context</a>  U.S. Department of State – 2022 Human Rights Report: Belgium  <a href="https://www.state.gov/reports/2022-country-reports-on-human-rights-practices/belgium/">https://www.state.gov/reports/2022-country-reports-on-human-rights-practices/belgium/</a>  U.S. Department of State – 2023 Human Rights Report: Belgium  <a href="https://www.state.gov/reports/2023-country-reports-on-human-rights-practices/belgium/">https://www.state.gov/reports/2023-country-reports-on-human-rights-practices/belgium/</a>  OHCHR – UN Committee on Economic, Social and Cultural Rights: Dialogue with Belgium  <a href="https://www.ohchr.org/en/press-releases/2020/02/committee-economic-social-and-cultural-rights-dialogue-belgium-discusses">https://www.ohchr.org/en/press-releases/2020/02/committee-economic-social-and-cultural-rights-dialogue-belgium-discusses</a>  The Brussels Times – Alarming Decline of Flemish Forests  <a href="https://www.brusselstimes.com/576749/losing-a-football-pitch-every-day-alarming-decline-of-flemish-forests">https://www.brusselstimes.com/576749/losing-a-football-pitch-every-day-alarming-decline-of-flemish-forests</a>  Gazet van Antwerpen – Natuur en Bos moet eigen 'verboden toegang'-bordjes verwijderen in Postelse bossen  <a href="https://www.gva.be/regio/antwerpen/kempen/mol/natuur-en-bos-moet-eigen-verboden-toegang-bordjes-verwijderen-uit-postelse-bossen-maar-het-bos-dat-toegang-geeft-tot-ecoduct-blijft-beschermd/40166078.html">https://www.gva.be/regio/antwerpen/kempen/mol/natuur-en-bos-moet-eigen-verboden-toegang-bordjes-verwijderen-uit-postelse-bossen-maar-het-bos-dat-toegang-geeft-tot-ecoduct-blijft-beschermd/40166078.html</a>  Het Laatste Nieuws – Boeren boos over aanplant bos op landbouwgrond  <a href="https://www.hln.be/zoersel/boeren-boos-over-aanplant-bos-op-landbouwgrond-gras-zuivert-ook-lucht~a66ee1bb/">https://www.hln.be/zoersel/boeren-boos-over-aanplant-bos-op-landbouwgrond-gras-zuivert-ook-lucht~a66ee1bb/</a>  Radio 2 – Naya moet opletten in Wallonië  <a href="https://radio2.be/lees/naya-moet-oplekken-in-wallonie">https://radio2.be/lees/naya-moet-oplekken-in-wallonie</a>  Het Nieuwsblad – Boswachters zetten wolvin Naya onder druk  <a href="https://www.nieuwsblad.be/cnt/dmf20210210_96095765">https://www.nieuwsblad.be/cnt/dmf20210210_96095765</a>  Agentschap voor Natuur en Bos – Publieke Consultatie Natuurbeheerplannen  <a href="https://natuurenbos.vlaanderen.be/inspraak-van-de-burger/natuurbeheerplannen-publieke-consultatie">https://natuurenbos.vlaanderen.be/inspraak-van-de-burger/natuurbeheerplannen-publieke-consultatie</a>  See also indicators 1.1.2, 1.1.5, 2.2.2, 4.1.9, 4.2.2, 4.2.3, 4.2.4, 4.2.5.</p>
Risk Rating justification	<p>See also indicators 1.1.2, 1.1.5, 2.2.2, 4.1.9, 4.2.2, 4.2.3, 4.2.4, 4.2.5.</p> <p>Environmental protection in Belgium is managed at the regional level, with each region—Flanders, Wallonia, and Brussels—having its own policies and regulations. The Flemish government oversees environmental protection through the "Agentschap voor Natuur en Bos" (Agency for Nature and Forests). Key areas include waste management, air and water quality, and biodiversity conservation. Businesses and individuals must comply with strict</p>

environmental permits, which are regulated through the "Omgevingsloket" (Environmental Service Portal).

Wallonia's environmental policies are guided by its regional government, focusing on sustainable forestry, waste reduction, and pollution control. The Walloon Environmental Code highlights the significance of environmental impact assessments (EIA) for projects with potential environmental effects. Articles D.67, D.68, and Annexes VI and VII detail the requirements for these assessments. For projects not automatically subject to a full EIA, a "notice d'évaluation des incidences sur l'environnement" (mini-EIA) is mandatory to evaluate potential impacts. For larger projects, the competent authority determines whether significant environmental consequences are likely and whether a full EIA is necessary. This decision must be clearly justified and documented within the final permit.

As an urban region, Brussels emphasizes air quality, energy efficiency, and green spaces. Environmental policies are tailored to address urban challenges, such as reducing emissions and promoting sustainable construction practices.

Municipalities in Flanders, Wallonia, and Brussels are responsible for implementing land-use policies and issuing permits for activities that may impact local communities.

While forestry activities are often exempt from detailed environmental impact assessments, significant urban or infrastructure projects must undergo these assessments, ensuring that any major community impacts are identified and avoided early in the planning process.

Belgium also incorporates Natura 2000 sites and other protected areas under the European Union's Habitats Directive. These sites are managed in a way that aims to avoid negative environmental and social impacts. Municipalities and regional authorities work to protect such areas from inappropriate land use and ensure compliance with EU conservation regulations.

Environmental authorities, including the Flemish Environment Agency (Vlaamse Milieumaatschappij), Walloon Public Service (SPW), and Brussels Environment, are responsible for enforcing environmental and spatial planning regulations. These agencies ensure that projects comply with land-use plans and environmental standards. In addition, they monitor the environmental impacts of major development projects, with particular focus on those that may affect local communities. Regional planning authorities play a vital role in ensuring that public consultations are held, especially for projects that could lead to adverse social impacts, such as urban expansion, infrastructure development, and forestry operations.

In Belgium, concerns regarding the social and community impacts of forestry are addressed through distinct regional channels.

In Flanders complaints predominantly originate at the local level, with municipalities and councils serving as primary points of contact for issues like land use changes. Environmental NGOs, such as Bond Beter Leefmilieu and Natuurpunt, play a key role in advocating for sustainable management and addressing broader environmental concerns. The Flemish Government also receives formal complaints via public consultations and petitions. In Flandres there are processes for public review and comment on draft nature

management plans.

In Wallonia the regional authorities, including the Walloon Government and the Walloon Forest Department, are central to addressing grievances. Local communities engage with the Walloon Environmental Commission and town halls. Environmental NGOs like Nature et Progrès Wallonie and Greenpeace raise awareness of negative impacts, particularly concerning land access and use.

Brussels-Capital Region: Complaints in Brussels focus on urban forestry and green space management. The Brussels Regional Government handles issues related to accessibility and urban development impacts. Citizen groups and urban-based NGOs are active in addressing reduced public access and environmental degradation.

Key NTFPs gathering is mostly linked to property rights: The fundamental principle is that the ownership of forest land largely determines the rights to harvest NTFPs. Private landowners have the greatest control over what is gathered on their property. Public forests are subject to regulations set by the regional authorities. Regarding mushrooms, all regions enforce limitations on the quantity that can be harvested for personal consumption. Commercial harvesting necessitates obtaining permits, and the gathering of protected species is strictly forbidden. Similar regulatory frameworks govern the harvesting of berries, encompassing restrictions on quantity and prohibitions against the collection of protected species. The gathering of firewood is generally prohibited in public forests without explicit authorization. Private landowners, however, retain the right to harvest firewood on their own property. Finally, the collection of plants and herbs is regulated to protect vulnerable ecosystems, with a strict prohibition on the gathering of protected plant species.

Community consultation in forest management plans is respected within modern Belgian practices, reflecting an increased awareness of stakeholder rights. Certified forest management schemes, such as those under PEFC or FSC, often mandate community engagement as part of their standards. Mechanisms for this consultation include public hearings and advisory committees, ensuring diverse local interests are considered. This integration aims to balance ecological sustainability with social and economic needs within forest management.

Across all regions, common concerns for local communities include: loss of public access to forests, environmental degradation due to deforestation or poor management, and conflicts between commercial forestry and local community interests. These issues highlight the need for balanced forestry practices that consider both economic and social-environmental impacts. Belgium has comprehensive legislation in place to manage and mitigate negative social impacts resulting from land use, biomass procurement, and forestry operations. While most forestry activities are not subject to Environmental Impact Assessments, larger infrastructure or development projects, including those related to biomass procurement, are required to conduct assessments and public consultations. Based on the current regulatory framework and enforcement mechanisms, the risk of significant negative social impacts due to forestry operations or other land-use activities

	is deemed to be low, as long as these projects comply with established spatial planning and environmental regulations.
<b>Risk Rating</b>	Low Risk

Belgium European area	Indicator
<b>4.2.2</b>	Feedstock sourcing shall positively contribute to the local economy, including employment.
<b>Supply Base Verifiers</b>	<ul style="list-style-type: none"> <li>• Ratification of international conventions.</li> <li>• Legislation and regulations, authorities, law-enforcement</li> <li>• Internet research on the level of law enforcement in relation to forestry in Belgium</li> <li>• Databases (Eurostat and FAOstat)</li> </ul> <p>Convention on Biological Diversity (CBD) – Official Website  <a href="https://www.cbd.int/">https://www.cbd.int/</a>  Nagoya Protocol on Access and Benefit-sharing – CBD  <a href="https://www.cbd.int/abs/">https://www.cbd.int/abs/</a>  UN Sustainable Development Goals – Goal 8: Decent Work and Economic Growth  <a href="https://sdgs.un.org/goals/goal8">https://sdgs.un.org/goals/goal8</a>  UN Sustainable Development Goals – Goal 12: Responsible Consumption and Production  <a href="https://sdgs.un.org/goals/goal12">https://sdgs.un.org/goals/goal12</a>  UN Declaration on the Rights of Indigenous Peoples (UNDRIP) – UN Human Rights  <a href="https://www.ohchr.org/en/instruments-mechanisms/instruments/declaration-rights-indigenous-peoples">https://www.ohchr.org/en/instruments-mechanisms/instruments/declaration-rights-indigenous-peoples</a>  Ratification Status of ILO Conventions – Belgium  <a href="https://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102559">https://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102559</a>  FAO – FAOSTAT Global Food and Agriculture Data  <a href="https://www.fao.org/faostat/en/#home">https://www.fao.org/faostat/en/#home</a>  Eurostat – European Union Statistics Portal  <a href="https://ec.europa.eu/eurostat/web/main/home">https://ec.europa.eu/eurostat/web/main/home</a>  IRENA – Renewable Energy Employment by Country  <a href="https://www.irena.org/Data/View-data-by-topic/Benefits/Renewable-Energy-Employment-by-Country">https://www.irena.org/Data/View-data-by-topic/Benefits/Renewable-Energy-Employment-by-Country</a>  EUBIA – Employment Potential of Biomass in Figures  <a href="https://www.eubia.org/cms/wiki-biomass/employment-potential-in-figures/">https://www.eubia.org/cms/wiki-biomass/employment-potential-in-figures/</a>  Federale Overheidsdienst Werkgelegenheid – Coronamaatregelen  Arbeidsrecht België  <a href="https://werk.belgie.be/nl/themas/coronavirus/coronamaatregelen-op-het-vlak-van-arbeidsrecht">https://werk.belgie.be/nl/themas/coronavirus/coronamaatregelen-op-het-vlak-van-arbeidsrecht</a>  See also indicator 4.2.1.</p>
<b>Risk Rating justification</b>	See also indicator 4.2.1.

	<p>Several international frameworks support the principle that feedstock sourcing should contribute to the local economy and employment. The Convention on Biological Diversity (CBD) and its Nagoya Protocol promote benefit-sharing from natural resources, while the UN Declaration on the Rights of Indigenous Peoples (UNDRIP) affirms communities' rights to participate in and benefit from economic development. The UN Sustainable Development Goals (particularly SDGs 8 and 12) call for inclusive economic growth and responsible production. Belgium has ratified the CBD and the Nagoya Protocol, supports the SDGs, and has ratified most core ILO conventions. Forest residues still have a great biomass potential. Especially in Europe where, due to the high degree of utilization of industrial wood processing residues, sources of woody biomass for energy purposes are scarce. The use of low-grade forest residues for biomass production generates additional revenue for the landowner and employment for foresters and harvesting teams. The income makes it feasible to perform more often, and more complex forest maintenance operations. The biomass sector also makes it feasible to tidy up plots after they have been clearcut, making planting new trees easier.</p> <p>The biomass sector is sometimes the only sector that can generate income from necessary salvage and reconstruction operations, after forest fires, windfall, pest outbreaks, flooding etc. calamity. Without the biomass sector such operations would be done less.</p> <p>Considering the present policies to mitigate climate change risks in Belgian forestry, the biomass sector will play an important role, as present forests need to be transformed and new (mixed) forests need to be maintenance. In 2020, Belgium consumed 25.19 TJ wood pellets and 51.95 TJ solid biofuels. This level has stayed stable since. This solid biofuels category includes wood chips, bark, shavings and fuelwood. It are harvesting residues, by-products from the forest industry, and post-consumer recovered wood. Bioenergy is Belgium's largest source of energy, but the demand for specifically forest residue wood chips fluctuates. Currently all energy prices have risen and there is much demand for more renewable energy. FAOstat indicates the production of fuel wood increased with 29% in Belgium between 2008 and 2020. Considering the sharp increase in price for wood fuel, the economic turnover of on biomass production has increased even more.</p> <p>In Belgium in 2015, around 4,4 thousand people were working in forestry and logging (FAOstat). In 2021, around 1.3 thousand people were working in the solid biomass sector, of which nearly all in the woody biomass sector (IRENA). During the Corona pandemic the forestry sector was appointed a 'vital sector', unemployed people could start working in the forestry under favourable terms.</p>
<b>Risk Rating</b>	Low Risk

Belgium  
European area

Indicator



4.2.3	Food, water supply or high conservation values (HCV) that are essential for the fulfilment of basic needs of communities shall be maintained or enhanced
Supply Base Verifiers	<ul style="list-style-type: none"> <li>• Ratification of international conventions.</li> <li>• Legislation and regulations, authorities, law-enforcement</li> <li>• Internet research on the level of law enforcement in relation to forestry in Belgium</li> </ul> <p>Convention on Biological Diversity (CBD)  <a href="https://www.cbd.int/">https://www.cbd.int/</a>            Hunting Belgium – General Hunting Information Portal  <a href="https://hunting.be/">https://hunting.be/</a>            Hubertus Vereniging Vlaanderen (HVV) – Vlaamse Jagersvereniging  <a href="http://www.hvv.be">www.hvv.be</a>            Fédération des Chasseurs de Wallonie – Chasse.be  <a href="https://www.chasse.be">https://www.chasse.be</a>            Koninklijke Nederlandse Jagersvereniging – Jagen in België  <a href="https://www.jagersvereniging.nl/jagen/jagen-in-het-buitenland/belgie">https://www.jagersvereniging.nl/jagen/jagen-in-het-buitenland/belgie</a></p>
Risk Rating justification	<p>The Convention on Biological Diversity (CBD) promotes the conservation and sustainable use of biodiversity, recognising that many communities depend on natural ecosystems for basic needs such as food, water, and health. It includes provisions to protect traditional knowledge and ensure communities benefit from biodiversity use (Articles 8(j) and 10(c)). Belgium signed the CBD on 5 June 1992 and ratified it on 22 November 1996.</p> <p>In Belgium, however, there are no communities that are directly dependent on the forests, or woodlands for their basic needs. No cases were found that indicate forestry or the harvest of feedstock conflicts with the fulfilment of certain basic needs, such as nourishment.</p> <p>Forests can play an important role in conserving (drinking) water catchment areas. The presence of such an area can influence forest management plans and the restrictions stated in felling licenses. In general, Belgium has laws and regulations, on minimizing the impact and pollution of ground water, surface water, and waterbody. Conservation measures regarding clean drinking water are in line with European laws. Water catchment areas, and areas which have been polluted in the past, are monitored.</p> <p>Hunting in Belgium is highly regulated. Hunting rights are linked to ownership of the land, but can be transferred or rented out. Except in the Brussels region, where all hunting is prohibited. In Flanders and Wallonia concessions are given to registered hunters. To be able to hunt in Flanders or Wallonia, possession of a Flemish or a Walloon hunting licence is mandatory. The basis of the Hunting Legislation is the Act of 1882, of which, however, only a few paragraphs remain in force till date. It has been extensively supplemented with a several Hunting Decrees and Implementing Decrees. Hunting, however, cannot be considered essential to the basic needs of any community in Belgium.</p>
Risk Rating	Low Risk

Belgium European area	Indicator
4.2.4	Legal, customary, and traditional tenure and use rights of Indigenous Peoples and local communities related to the Supply Base shall be identified, documented, and respected.
Supply Base Verifiers	<ul style="list-style-type: none"> <li>• Ratification of international conventions on traditional and civil rights.</li> <li>• Legislation and regulations, authorities, law-enforcement</li> <li>• Internet research on the level of law enforcement in relation to Belgium</li> </ul> <p>ILO Convention No. 169 – Normlex, ILO  <a href="https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C169">https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C169</a>  Burgerlijk Wetboek / Code Civil 21.03.1804, Book II, Title IV, art. 516-710, articles 637 and the following on customary rights 'Erfdienstbaarheden' / 'Servitudes'.  National Forestry Accounting Plan of Belgium (2019)  <a href="https://www.cnc-nkc.be/sites/default/files/report/file/national_forestry_accounting_plan_-_belgium_-_18122019_1.pdf">https://www.cnc-nkc.be/sites/default/files/report/file/national_forestry_accounting_plan_-_belgium_-_18122019_1.pdf</a>  UNFCCC – National Inventory Document (1990–2022), submitted December 2024  <a href="https://unfccc.int/documents/644990">https://unfccc.int/documents/644990</a>  Agentschap voor Natuur en Bos – Vlaamse Bosinventaris: Bosareaal  <a href="https://www.natuurenbos.be/vlaamse-bosinventaris/Website_BosAreaal.html">https://www.natuurenbos.be/vlaamse-bosinventaris/Website_BosAreaal.html</a>  Agentschap voor Natuur en Bos – Bosinventaris Resultaten  <a href="https://www.natuurenbos.be/beleid-wetgeving/natuurbeheer/bosinventaris/resultaten#karakteristieken-bosareaal">https://www.natuurenbos.be/beleid-wetgeving/natuurbeheer/bosinventaris/resultaten#karakteristieken-bosareaal</a></p>
Risk Rating justification	<p>ILO Convention No. 169 affirms the rights of indigenous and tribal peoples to maintain their cultures, control their lands and resources, and participate in decisions that affect their lives and livelihoods. Belgium has not ratified this convention, likely because it has no indigenous or tribal populations as defined under international law, making its provisions inapplicable in the national context.</p> <p>There are no indigenous people in Belgium and no local communities dependent on the forest for their livelihood.</p> <p>The legal, customary and traditional tenure and use rights of local communities in general are respected. If contested, customary rights can be determined in a court of law.</p> <p>Any customary rights should be recorded on the ownership document, when a property is sold. In the Walloon Region, some user rights still exist in certain municipalities.</p>
Risk Rating	Low Risk

Belgium European area	Indicator
4.2.5	Mechanisms shall be in place for resolving grievances and disputes relating to tenure and use rights of the forest and other land management practices.

<b>Supply Base Verifiers</b>	<ul style="list-style-type: none"> <li>• Ratification of international conventions on traditional and civil rights.</li> <li>• Legislation and regulations on traditional or civil rights</li> <li>• Internet research on the level of law enforcement in relation to forestry in Belgium</li> </ul> <p>Burgerlijk Wetboek / Code Civil 21.03.1804, Book II, Title IV, art. 516-710, articles 637 and the following on customary rights 'Erfdienstbaarheden' / 'Servitudes'.</p> <p>International Labour Organization (ILO) – Global Homepage  <a href="https://www.ilo.org/global/lang--en/index.htm">https://www.ilo.org/global/lang--en/index.htm</a></p> <p>U.S. Department of State – 2021 Human Rights Report: Belgium  <a href="https://www.state.gov/reports/2021-country-reports-on-human-rights-practices/belgium/">https://www.state.gov/reports/2021-country-reports-on-human-rights-practices/belgium/</a></p> <p>U.S. Department of State – 2023 Human Rights Report: Belgium  <a href="https://www.state.gov/reports/2023-country-reports-on-human-rights-practices/belgium/">https://www.state.gov/reports/2023-country-reports-on-human-rights-practices/belgium/</a></p> <p>Ecopedia – Mushroom Picking Rules in Belgium (Flemish Region)  <a href="https://www.ecopedia.be/pagina/plukken-van-paddenstoelen">https://www.ecopedia.be/pagina/plukken-van-paddenstoelen</a></p> <p>See also indicators 1.1.2, 1.1.5, 4.1.9, 4.2.4 and 4.2.6.</p>
<b>Risk Rating justification</b>	<p>See also indicators 1.1.2, 1.1.5, 4.1.9, 4.2.4 and 4.2.6.</p> <p>There are no indigenous peoples in Belgium, nor people claiming to be dependent on the forest for their livelihoods in a traditional way.</p> <p>No references were found on disputes or conflicts over traditional or civil rights directly related to the sourcing of wood and production of biomass in Belgium.</p> <p>Customary rights come into force when a specific land use was accepted for more than 30 years. When identified, these rights will be recorded on the ownership documents when the property is sold. Other customary rights may exist without having been recorded, but these generally have a limited scope (for example the right to cross land). If contested, customary rights can be argued and determined in a court of law. In the Walloon Region. In private forest, notarial deeds (documents) may include certain rights that are thus protected. Forest management plans are subject to stakeholder consultation prior to approval by the forest and nature administration. This should ensure that customary rights are observed during harvesting activities. Given their limited scope and legal status, infringements on customary rights are not likely and the risk is considered low.</p> <p>Collecting non-timber forest products, as also roaming (private) forests are not a traditional or civil right in Belgium (often forbidden). This, however, has become an actual problem, as mushrooms are being collected and marketed. Forest inspectors no longer carry a service firearm and normally operate alone.</p> <p>In Flanders the prohibitions are listed in art. 97 of the Forest Decree. The article makes a distinction between public and private forests. In public forests and forest reserves, it is prohibited to remove 'fruits' without the permission of the owner and authorization from the Agency for Nature and Forests, or without it being included in an approved management plan. Moreover, the agreements regarding accessibility must also be taken into</p>

	<p>account: one should not leave the roads and paths (without authorization from the Agency). In private forests, picking fruits is not prohibited, but one does need the permission of the owner. In Wallonia, it is legally allowed to pick mushrooms with the permission of the owner (private property and municipalities). A volume of 10 litres per person per day is the maximum allowed amount of mushrooms one can gather.</p> <p>The U.S. Department of State's 2023 Human Rights Report indicates that Belgium continues to uphold traditional and civil rights, with the legal framework and judiciary providing avenues for redress in cases of individual abuse. Civilian authorities maintained effective oversight of security forces. Reported human rights concerns included instances of hate speech and attacks motivated by anti-Semitic and anti-Muslim sentiments, alongside violence targeting LGBT+ individuals. Authorities generally pursued investigations and prosecutions where credible allegations of human rights violations were made.</p>
<b>Risk Rating</b>	Low Risk

Belgium European area	Indicator
<b>4.2.6</b>	Where Indigenous Peoples' rights are identified in the Supply Base, and Free Prior and Informed Consent (FPIC) has not been achieved for the proposed and planned activities, a consultation and, if required, accommodation process shall be put in place.
<b>Supply Base Verifiers</b>	See indicators 1.1.2, 1.1.5, 4.2.4, 4.2.5
<b>Risk Rating justification</b>	See also indicators 1.1.2, 1.1.5, 4.2.4, 4.2.5. There are no indigenous people in Belgium and no local communities dependent on the forest for their livelihood.
<b>Risk Rating</b>	Low Risk

Belgium European area	Indicator
<b>4.2.7</b>	Designated cultural heritage sites shall be preserved.
<b>Supply Base Verifiers</b>	<ul style="list-style-type: none"> <li>• Ratification of international conventions.</li> <li>• Legislation and regulations, authorities and enforcement.</li> <li>• Protected areas and objects.</li> <li>• Internet research on critical publications.</li> </ul> <p>UNESCO – Belgium State Party Page (World Heritage Sites)  <a href="https://whc.unesco.org/en/statesparties/be">https://whc.unesco.org/en/statesparties/be</a>            UNESCO – World Heritage Convention Overview  <a href="https://whc.unesco.org/en/convention/">https://whc.unesco.org/en/convention/</a>            Decree of 28 September 2023 (Wallonia) – Cultural Heritage Protection  <a href="https://etaamb.openjustice.be/nl/decreet-van-28-september-2023_n2024001483">https://etaamb.openjustice.be/nl/decreet-van-28-september-2023_n2024001483</a>            Belgian Law of 9 April 2004 on the Protection of Immovable Heritage</p>

	<p>(Flemish Region)</p> <p><a href="https://www.ejustice.just.fgov.be/cgi_loi/change_lg.pl?language=nl&amp;la=N&amp;cn=2004040935&amp;table_name=wet">https://www.ejustice.just.fgov.be/cgi_loi/change_lg.pl?language=nl&amp;la=N&amp;cn=2004040935&amp;table_name=wet</a></p> <p>Portail du Patrimoine – Fédération Wallonie-Bruxelles</p> <p><a href="https://www.patrimoineculturel.cfwb.be">https://www.patrimoineculturel.cfwb.be</a></p> <p>COPAT – Consolidated Text on Protected Heritage in Wallonia</p> <p><a href="https://www.patrimoineculturel.cfwb.be/fileadmin/sites/patrimoineculturel/uploads/DocuAdmin/copat-consolide-2.pdf">https://www.patrimoineculturel.cfwb.be/fileadmin/sites/patrimoineculturel/uploads/DocuAdmin/copat-consolide-2.pdf</a></p> <p>Wallonie Patrimoine – Official Heritage Portal</p> <p><a href="https://lampspw.wallonie.be/dgo4/site_patrimoine">https://lampspw.wallonie.be/dgo4/site_patrimoine</a></p> <p>Bruxelles Environnement – Official Website</p> <p><a href="https://environnement.brussels">https://environnement.brussels</a></p> <p>Brussels-Capital Region – Environmental and Heritage Management (IBGE)</p> <p><a href="https://environnement.brussels/thematiques/patrimoine">https://environnement.brussels/thematiques/patrimoine</a></p> <p>FARO – Flemish Interface Centre for Cultural Heritage</p> <p><a href="https://faro.be">https://faro.be</a></p> <p>See also indicator 2.1.1.</p>
<b>Risk Rating justification</b>	<p>See indicator 2.1.1 related to HCV 6.</p> <p>Belgium has ratified the World Heritage Convention in 1996 and is committed to protecting their World Heritage sites.</p> <p>The locations of world heritage sites in Belgium: The Grand-Place, Major Town Houses of the Architect Victor Horta, and the Stoclet House are all located in Brussels. The Major Mining Sites of Wallonia include four sites, while the Beguinages, consisting of 13 sites, are spread across the country. Additionally, Belgium is home to 33 of the 56 Belfries of Belgium and France. The Funerary and memory sites of the First World War (Western Front) include 43 sites across Belgium.</p> <p>Belgium has strong legal protections for its cultural heritage, with key legislation at regional levels:</p> <p>The protection of Walloon cultural heritage is now governed by the Decree of 28 September 2023, which replaces the former Heritage Code and outlines comprehensive provisions for heritage management. This legislation establishes procedures for property protection, integrates conservation practices, and defines the responsibilities of heritage authorities, including the organization of heritage meetings for project evaluation</p> <p>The protection of Brussels' cultural heritage is primarily regulated through the Brussels Code of Urbanism (BWRO), which came into effect in 2004 and consolidated previous ordinances. The Directorate of Cultural Heritage is responsible for the implementation of this legislation, including handling applications for safeguarding, protection, and restoration of heritage.</p> <p>Flemish regional laws, such as the Flemish Decree on Heritage (1991), align with the national framework but include regional initiatives for cultural heritage protection, focusing on the region's rich architectural history and other heritage assets.</p> <p>Responsible organisations for policy in Wallonia and Brussels:</p> <ul style="list-style-type: none"> <li>- Fédération Wallonie-Bruxelles: Oversees cultural heritage protection within the Walloon region and Brussels.</li> <li>- Walloon Heritage Agency (AWaP): Responsible for the conservation and</li> </ul>

	<p>management of heritage sites in Wallonia.</p> <p>- Brussels Institute for the Management of Nature and Forests (IBGE): Focuses on the preservation of cultural heritage in Brussels.</p> <p>In Flanders there is the Flemish Heritage Agency (Vlaamse Erfgoedorganisatie): Ensures the protection of cultural heritage within Flanders.</p> <p>In Wallonia and Brussels, regional inspection services are responsible for monitoring the condition and preservation of designated heritage sites. Complementing this, the Federal Inspectorate assesses and ensures nationwide compliance with heritage protection laws. In Flanders, the Flemish Heritage Agency conducts regular checks and audits to guarantee the conservation of cultural heritage within the region. Local enforcement is further supported by municipal heritage departments, which assist in upholding heritage preservation laws at the local level. This multi-tiered approach ensures comprehensive oversight and protection of Belgium's diverse cultural heritage.</p> <p>The three Belgian districts have identified and mapped cultural heritage sites and features, as also areas of national cultural significance. Some of these sites can be found in forests. Also archaeological sites and features have been identified and mapped.</p> <p>Regardless of the region, there's a legal obligation to report archaeological finds. This is to ensure that valuable historical information is not lost.</p> <p>In Flanders, the Agency for Immovable Heritage ("Onroerend Erfgoed") is the primary authority responsible for overseeing the protection of archaeological sites and heritage. There is a legal obligation to report any archaeological finds, ensuring that they are properly documented and preserved. Specific regulations govern the use of metal detectors and the handling of discovered artefacts to prevent unauthorized excavation or damage. The law provides strong protection for archaeological sites, safeguarding them from any activities that may threaten their integrity.</p> <p>In Wallonia, the Walloon Region is responsible for the preservation and management of archaeological heritage. According to Article 40 of the Code Wallon du Patrimoine, any accidental archaeological find must be reported to both the local municipal authorities and the landowner within eight days. The mayor is then required to forward this declaration to the Walloon government for further action and documentation.</p> <p>The Brussels-Capital Region also has regulations in place for the protection of archaeological heritage. Similar to the other regions, there is an obligation to report any archaeological finds to the relevant authorities. The region specifically focuses on safeguarding heritage within its urban environment, ensuring that archaeological sites are preserved amidst ongoing urban development and expansion.</p> <p>No references were found that indicate that such heritage sites are threatened by forest management.</p>
<b>Risk Rating</b>	Low Risk





## Annex 2: EU RED Supply Base Evaluation

Countries where EU RED Supply Base Evaluation is used	
Country	France
Area	European areas
Sustainable harvesting criteria 29(6)	
(i) The legality of harvesting operations	
Type of Risk Assessment used	<input type="checkbox"/> Level A – proof at national or sub-national level <input checked="" type="checkbox"/> Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	<p>Our monitoring system covers all forest-biomass supplies and applies due diligence, supplier declarations, supplier evaluations, and harvesting-plot assessments.</p> <p>This indicator stayed unchanged. The REDII Level A report for France rated it Low Risk and our 2025 review found no new information that would alter this conclusion.</p>
(ii) Forest regeneration of harvested areas	
Type of Risk Assessment used	<input type="checkbox"/> Level A – proof at national or sub-national level <input checked="" type="checkbox"/> Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	<p>This indicator stayed unchanged. The REDII Level A report for France rated it Low Risk and our 2025 review found no new information that would alter this conclusion.</p>
(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grasslands, heathland and peatlands, are protected with the aim of preserving biodiversity and preventing habitat destruction, unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes	
Type of Risk Assessment used	<input type="checkbox"/> Level A – proof at national or sub-national level <input checked="" type="checkbox"/> Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	<p>The legal framework allows such activities only under strict conditions, requiring approved management plans and/or permits.</p> <p>While we have concerns about outdated management plans and weaknesses in official monitoring and reporting, operations in practice contribute to nature protection.</p> <p>Our company does check if biomass harvesting interferes with the environmental goals of protected areas, although it is considered Low</p>

	Risk.
<p>(iv) that harvesting is carried out considering the maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth forests as defined in the country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located, and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with requirements to use logging systems that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and habitats</p>	
Type of Risk Assessment used	<input type="checkbox"/> Level A – proof at national or sub-national level <input checked="" type="checkbox"/> Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	<p>SBP requires our company monitors the quality of performing forest operations onsite.</p> <p>Suppliers are assessed and categorised, and their harvesting teams are monitored accordingly: field inspections include document reviews, verifications of online maps and databases, site inspections, and interviews. The quality of operations in progress is evaluated, including deadwood retention levels, harvest impacts and measures safeguarding biodiversity and soil quality (best practices).</p> <p>An elaborate checklist is filled in on operational aspects. All inspections and findings are documented, including supporting documents and photographs.</p>
<p>(v) That harvesting maintains or improves the long-term production capacity of the forest.</p>	
Type of Risk Assessment used	<input type="checkbox"/> Level A – proof at national or sub-national level <input checked="" type="checkbox"/> Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	<p>This indicator stayed unchanged. The REDII Level A report for France rated it Low Risk and our 2025 review found no new information that would alter this conclusion.</p>
<p>(vi)<sup>1</sup> That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.</p> <p><i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i></p> <p><i>(a) <b>primary forest</b> and other wooded land and <b>old growth forest</b>, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located. If there is no definition of <b>old growth forest</b> at the national level, then the following definition shall apply: A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.</i></p>	
Type of Risk Assessment used	<input type="checkbox"/> Level A – proof at national or sub-national level <input checked="" type="checkbox"/> Level B – management system at forest sourcing area level

<b>Level A risk assessment description</b>	N/A
<b>Level B management system at the level of the forest sourcing area</b>	Although primary forests are often considered absent in metropolitan France, four protected parks contain forests that come sufficiently close: Parc des Ballons des Vosges, Haut-Jura, Pyrénées, and Vanoise. Old Growth Forests are present in France, in and outside of parks and protection zones. Biomass sourcing from the indicated parks and from Old Growth Forests are excluded from sourcing (No-Go areas).
<p><b>(vi)<sup>2</sup> That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.</b></p> <p><i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i></p> <p><i>(b) highly biodiverse forest and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.</i></p>	
<b>Type of Risk Assessment used</b>	<input type="checkbox"/> Level A – proof at national or sub-national level <input checked="" type="checkbox"/> Level B – management system at forest sourcing area level
<b>Level A risk assessment description</b>	N/A
<b>Level B management system at the level of the forest sourcing area</b>	<p>Forests in France host many protected species and can consist of key connectivity corridors. Many EU Habitat Directive forest habitats are under pressure. They occur both inside and outside Natura 2000 and additional investigation is needed. Annex I forest habitats under pressure are: - Beech forests (9110–9150) - Oak-hornbeam forests (9160) - Ravine forests (9180) - Old acidophilous oak woods (9190) - Thermophilous narrow-leaf ash woods (91B0) - Bog woodland (91D0) - Alluvial forests (91E0) - Riparian forests and galleries (91F0, 92A0, 92D0) - Sweet-chestnut secondary woods (9260) - Mediterranean endemic pine forests (9540) - Wooded dunes (2180). Some ecologically important forests are not yet formally protected but are recognised in management documents, forest plans, or ecological inventories. They also occur within regular forests, where they are not always identified or categorised. Specified risk applies mainly to the valuable Annex I forest habitat types, and to forests containing key elements of such habitats, on private lands outside protected areas. Suppliers provide the harvest-site geolocations and assist in identifying Annex I habitats. Our company monitors all biomass sourcing areas. Any biomass sourcing from forests established after 2007 triggers additional verification of the vegetation type in January 2008. The biodiversity values must have been maintained or improved since. FSC certification is recognised as supporting evidence within this risk-mitigation procedure.</p>
<p><b>(vi)<sup>3</sup> That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.</b></p> <p><i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i></p> <p><i>(d) highly biodiverse grassland spanning more than one hectare that is: (i) natural, namely grassland that would remain grassland in the absence of human intervention and that maintains the natural species composition and ecological characteristics and processes; or (ii) non-natural, namely grassland that would cease to be grassland in the absence of human intervention and that is species-rich and not degraded and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the harvesting of the raw material is necessary to preserve</i></p>	

<i>its status as highly biodiverse grassland.</i>	
<b>Type of Risk Assessment used</b>	<input type="checkbox"/> Level A – proof at national or sub-national level <input checked="" type="checkbox"/> Level B – management system at forest sourcing area level
<b>Level A risk assessment description</b>	N/A
<b>Level B management system at the level of the forest sourcing area</b>	<p>Natural highly biodiverse grasslands are species-rich and self-sustaining. In France they are present, but they occur mainly above the climatic treeline and in fixed coastal dunes. Most sites are protected and monitored. After 2007, the main pressures are climate change, recreation, infrastructure, eutrophication, invasives, and dune dynamics; afforestation is not a driver. Conversion to forest is rare to absent. Natural highly biodiverse grasslands are No-Go areas, and therefore trigger a specified risk. Biomass sourcing is excluded, with vigilance for their occurrence in unprotected areas. Any biomass sourcing along the coastline automatically triggers additional investigations as it can house habitat type 2130 (fixed coastal dunes with herbaceous vegetation), as well as 2180 (wooded dunes) and 4040 (Dry Atlantic coastal heath). Non-natural highly biodiverse grasslands are species-rich but depend on management such as extensive grazing, late mowing and shrub control. Since 2008, they have declined mainly due to agricultural intensification or abandonment, eutrophication, infrastructure and recreation; many Annex I types remain unfavourable and sensitive to nitrogen and scrub/pine encroachment. Conversion of “permanent sensitive grasslands” within the EU ecological network is prohibited via CAP conditionality, while five-year agri-environment contracts maintain species-rich meadows and pastures. However, there still are poorly mapped, unprotected parcels. This vegetation type is not a No-Go area, but it is subject to stricter controls than others; any biomass sourcing must actively contribute to its conservation. Restoration operations may remove shrubs/trees and adjust hydrology; tree-planting schemes must avoid sensitive grasslands. Specified risk for managers of young forests or degraded grassland after 2007. Post-2007 afforestation or succession is investigated against the January 2008 baseline using plans, permits, online maps and databases, with field inspections and stakeholder consultation. Forest area is significantly increasing in France.</p>
<p><b>(vi)<sup>4</sup> That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.</b></p> <p><i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i></p> <p><i>(e) <b>heathland</b> - Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).</i></p>	
<b>Type of Risk Assessment used</b>	<input type="checkbox"/> Level A – proof at national or sub-national level <input checked="" type="checkbox"/> Level B – management system at forest sourcing area level
<b>Level A risk assessment description</b>	N/A
<b>Level B management system at the level of the forest sourcing area</b>	<p>Large tracts and small patches of heathland are present in France. As heathland is a No-Go area, it becomes a specified risk. Biomass sourcing is excluded. France's heathlands (4010 European dry, 4030 Northern Atlantic wet, 4040 Atlantic coastal/dune, 4060 Alpine/subalpine) are relics of a once extensive</p>

	<p>landscape. Historic drainage, agricultural improvement, conifer planting, urbanisation and infrastructure drove losses; remnants are fragmented and sensitive to nitrogen deposition, shrub/pine encroachment, invasives, recreation and increasing fire/weather extremes (with extinction-debt risks). There is near to half a million ha left. Main complexes occur on Atlantic/Channel coasts, Brittany/Armorican Massif, and Alps/Pyrenees/Massif Central. Most significant areas are in designated areas (Natura 2000/nature reserves/parks) and managed through grazing, targeted shrub/tree removal, hydrological measures and, where authorised, tightly controlled burning. Their status is generally unfavourable.</p>
<p><b>(vi)<sup>5</sup> That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.</b></p> <p><i>Article 29 (4): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status: (a) <b>wetlands</b>, namely land that is covered with or saturated by water permanently or for a significant part of the year (NOTE: Evidence of verification of wetlands should reflect seasonal changes within a year).</i></p>	
<b>Type of Risk Assessment used</b>	<input type="checkbox"/> Level A – proof at national or sub-national level <input checked="" type="checkbox"/> Level B – management system at forest sourcing area level
<b>Level A risk assessment description</b>	N/A
<b>Level B management system at the level of the forest sourcing area</b>	<p>Since 2007, wetland has been under pressure from agri-water management, urbanisation/infrastructure, pollution and extreme weather conditions, but not from afforestation. While large-scale restoration and legal screening constrain planting and often remove trees; forestry on wetlands is not a loss driver, and post-2023 CAP adds farm-wetland protections. The risk of conversion is low, but any indication of conversion triggers an investigation. Biomass is excluded from confirmed cases of converted land, unless the area is compensated lawfully. Our company and our suppliers flag any biomass sourcing from suspected wetland sites, triggering biodiversity investigations.</p>
<p><b>(vi)<sup>6</sup> That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.</b></p> <p><i>Article 29 (5): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was <b>peatland</b> in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.</i></p>	
<b>Type of Risk Assessment used</b>	<input type="checkbox"/> Level A – proof at national or sub-national level <input checked="" type="checkbox"/> Level B – management system at forest sourcing area level
<b>Level A risk assessment description</b>	N/A
<b>Level B management system at the level of the forest sourcing area</b>	<p>France's peatlands are widely protected (Natura 2000, Ramsar, national designations); forestry conversion is not a current driver, and forests on drained peat are very rare. Since 2007, the main pressures have been agriculture, local infrastructure and climatic effects. Policy prioritises rewetting and, where needed, conifer removal; afforestation on peat is restricted. The risk level is low. Potential impacts are mainly indirect, for example, groundwater drawdown from adjacent drained farmland. However, any indication of drainage issues still triggers a desk-based review (permits, maps, hydrology) and, if required, a site inspection.</p>



	Confirmed and unresolved cases are excluded from biomass sourcing. Areas which were converted to urban or infrastructure uses in the past do not yield biomass anymore today.
<b>(vii) that installations producing biomass fuels from forest biomass, issue a statement of assurance, underpinned by company-level internal processes, for the purpose of the audits conducted pursuant to Article 30(3), that the forest biomass is not sourced from the lands referred to in point (vi).</b>	
<b>Type of Risk Assessment used</b>	<input checked="" type="checkbox"/> Level A – proof at national or sub-national level <input type="checkbox"/> Level B – management system at forest sourcing area level
<b>Level A risk assessment description</b>	N/A
<b>Level B management system at the level of the forest sourcing area</b>	<i>Not applicable, requirement only applies to Level A</i>

<b>LULUCF criteria 29(7)</b>	
<b>Type of Risk Assessment used</b>	<input checked="" type="checkbox"/> Level A – proof at national or sub-national level <input type="checkbox"/> Level B – management system at forest sourcing area level
<b>Level A risk assessment description</b>	SBP-endorsed REDII Level A risk assessment for Article 29(7) LULUCF
<b>Level B management system at the level of the forest sourcing area</b>	N/A

<b>Countries where EU RED Supply Base Evaluation is used</b>	
<b>Country</b>	Belgium
<b>Area</b>	European area
<b>Sustainable harvesting criteria 29(6)</b>	
<b>(i) The legality of harvesting operations</b>	
<b>Type of Risk Assessment used</b>	<input type="checkbox"/> Level A – proof at national or sub-national level <input checked="" type="checkbox"/> Level B – management system at forest sourcing area level
<b>Level A risk assessment description</b>	N/A
<b>Level B management system at the level of the forest sourcing area</b>	<p>Our company implements a due diligence system and a monitoring system on all supplies. Information is gathered and risks are assessed related to the suppliers themselves, their supply bases, and their their supply chains. All suppliers sign Supplier Declarations, and are evaluated. Suppliers are visited and Supplier Evaluation reports are made. These evaluations include assessments of their operational performance.</p> <p>The EU RED Level B report assessed Wallonia and Flanders (but not the Brussels region).</p> <p>Considering Flanders, there are seldom legality concerns, however</p>

	<p>forest clearing without a permit rose in 2024, driven by a controversial legal loop allowing retroactive permits (avoiding fines). Therefore specified risk applies to private forest owners, who are not affiliated with a forest group. To mitigate the risk the harvesting permit is demanded. Considering Wallonia, the REDII Level A report for Wallonia concluded Low Risk on this unchanged indicator. Our company is aware that private forest owners in Wallonia often do not require a permit to conduct harvesting operations. If there is any doubt about the legality or sustainability of the operations, our company requests proof of submission of the official "notification".</p> <p>Risk mitigation (general summary for each country and region): Suppliers provide the wood's origin (harvesting location) and proactively notify our company if they encounter key forest characteristics linked to specified risks. Our company verifies the location using online mapping tools and databases, assessing the type of area and habitat, and checking whether the area was converted or degraded after 2007. Desk research must confirm with certainty that EU RED requirements are met. If there is any doubt, a field inspection of the sourcing area can be conducted. Random inspections are carried out to check performance and best practices. No-go areas and biomass from sensitive sites that fail to meet EU RED sustainability requirements are excluded. All findings are systematically documented, including checklists, maps, permits, photographs, and notes.</p>
<b>(ii) Forest regeneration of harvested areas</b>	
<b>Type of Risk Assessment used</b>	<input type="checkbox"/> Level A – proof at national or sub-national level <input checked="" type="checkbox"/> Level B – management system at forest sourcing area level
<b>Level A risk assessment description</b>	N/A
<b>Level B management system at the level of the forest sourcing area</b>	<p>In Flanders, reforestation is legally required under the Forest Decree and adequately enforced by the Nature and Forest Agency (ANB). For Wallonia, this indicator stayed unchanged. The REDII Level A report rated it Low Risk and our 2025 review found no new information that would alter this conclusion.</p>
<b>(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grasslands, heathland and peatlands, are protected with the aim of preserving biodiversity and preventing habitat destruction, unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes</b>	
<b>Type of Risk Assessment used</b>	<input type="checkbox"/> Level A – proof at national or sub-national level <input checked="" type="checkbox"/> Level B – management system at forest sourcing area level
<b>Level A risk assessment description</b>	N/A
<b>Level B management system at the level of the forest sourcing area</b>	<p>Our EU RED Level B report assessed Wallonia and Flanders. In both Belgian regions, the legal framework permits harvesting operations only under strict conditions, requiring approved management</p>

	<p>plans and/or permits. Operations have been closely monitored for several years and, despite occasionally being poorly documented, they generally contribute to the stated nature conservation goals.</p> <p>Our company has concerns about outdated plans, inaccuracies in standardised procedures, and weaknesses in official monitoring and reporting. In Wallonia rigorous harvesting of beech has been encountered to promote oak.</p> <p>Formally the situation is considered specified risk in Wallonia and low risk in Flanders, but our company checks if biomass harvesting interferes with the environmental goals of protected areas in any case.</p>
<p><b>(iv) that harvesting is carried out considering the maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth forests as defined in the country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located, and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with requirements to use logging systems that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and habitats</b></p>	
<b>Type of Risk Assessment used</b>	<input type="checkbox"/> Level A – proof at national or sub-national level <input checked="" type="checkbox"/> Level B – management system at forest sourcing area level
<b>Level A risk assessment description</b>	N/A
<b>Level B management system at the level of the forest sourcing area</b>	<p>SBP requires our company monitors the quality of forest operations onsite in any case.</p> <p>Suppliers are assessed and categorised, and their harvesting teams are monitored accordingly: field inspections include document reviews, verifications of online maps and databases, site inspections, and interviews. The quality of operations in progress is evaluated, including deadwood retention levels, harvest impacts and measures safeguarding biodiversity and soil quality (best practices). An elaborate checklist is filled in. All inspections and findings are documented, including supporting documents and photographs.</p>
<p><b>(v) That harvesting maintains or improves the long-term production capacity of the forest.</b></p>	
<b>Type of Risk Assessment used</b>	<input type="checkbox"/> Level A – proof at national or sub-national level <input checked="" type="checkbox"/> Level B – management system at forest sourcing area level
<b>Level A risk assessment description</b>	N/A
<b>Level B management system at the level of the forest sourcing area</b>	<p>In Flanders this criterion is low risk for all forest managers. Harvesting in the region requires approved plans or permits and is monitored by the ANB. About 70% of annual growth is harvested, forest stock is rising, and resilience is improving through a shift to mixed forests. Oversight is weaker on (unmanaged) private lands, but data indicate forest productivity is well maintained.</p> <p>For Wallonia, this indicator stayed unchanged. The REDII Level A report rated it Low Risk and our 2025 review found no new information that would alter this conclusion.</p>

**(vi)<sup>1</sup> That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.**

*Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:*

*(a) **primary forest** and other wooded land and **old growth forest**, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located. If there is no definition of **old growth forest** at the national level, then the following definition shall apply: A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.*

<b>Type of Risk Assessment used</b>	<input type="checkbox"/> Level A – proof at national or sub-national level <input checked="" type="checkbox"/> Level B – management system at forest sourcing area level
<b>Level A risk assessment description</b>	N/A
<b>Level B management system at the level of the forest sourcing area</b>	There are no primary forests in Belgium. However, Old Growth Forests are present in these regions. They are excluded from biomass sourcing (No-Go area). There are several officially recognized Old Growth Forests in protected areas, but our monitoring system does not limit itself to these. All Old Growth Forests in any type of forest are excluded from biomass sourcing.

**(vi)<sup>2</sup> That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.**

*Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:*

*(b) **highly biodiverse forest** and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.*

<b>Type of Risk Assessment used</b>	<input type="checkbox"/> Level A – proof at national or sub-national level <input checked="" type="checkbox"/> Level B – management system at forest sourcing area level
<b>Level A risk assessment description</b>	N/A
<b>Level B management system at the level of the forest sourcing area</b>	Belgian forests host high biodiversity, including protected species (for example the stag beetle, middle spotted woodpecker, and rare orchids). Functional forest corridors support landscape connectivity. High-value elements occur in reserves and in managed private stands. A substantial share is designated under Forest Europe (MCPFE) Classes 1–3: Class 1—strict biodiversity conservation with minimal or no harvesting; Class 2—management that preserves specified features; Class 3—management prioritising protective functions (soil and water) over production. Several Annex I forest habitat types of high conservation value are under pressure; they occur in protected areas and in ordinary forests where they may not be identified. A specified risk applies to these habitats and to forests containing their key elements; management on private land and in mapped priority zones pending designation are investigated in detail. Public forest in Flanders is considered low risk, but assessed nonetheless. Annex I forest habitat types of concern include: - Beech forests (9110–9130) - Oak(-hornbeam) forests (9160) - Ravine forests (9180) - Old acidophilous oak woods (9190) - Bog woodland (91D0) - Alluvial forests (91E0) - Riparian forests (91F0) - Wooded dunes (2180). Competent authorities have identified additional ecologically valuable forest areas

	not yet formally designated, these areas are often buffer zones, restoration areas (including LIFE projects), or Natura 2000 candidates. Any biomass sourcing in such areas is investigated. Any biomass sourcing from forests established after 2007 triggers the verification of the vegetation type in January 2008.
<p><b>(vi)<sup>3</sup> That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.</b></p> <p><i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i></p> <p><i>(d) <b>highly biodiverse grassland</b> spanning more than one hectare that is: (i) natural, namely grassland that would remain grassland in the absence of human intervention and that maintains the natural species composition and ecological characteristics and processes; or (ii) non-natural, namely grassland that would cease to be grassland in the absence of human intervention and that is species-rich and not degraded and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the harvesting of the raw material is necessary to preserve its status as highly biodiverse grassland.</i></p>	
<b>Type of Risk Assessment used</b>	<input type="checkbox"/> Level A – proof at national or sub-national level <input checked="" type="checkbox"/> Level B – management system at forest sourcing area level
<b>Level A risk assessment description</b>	N/A
<b>Level B management system at the level of the forest sourcing area</b>	<p>In Belgium, there are no highly-biodiverse natural grasslands of over 1 ha; there are only a few plots of natural grasslands of under 1 ha. They are mapped and well protected. Non-natural, highly-biodiverse grasslands can be protected under environmental schemes and Natura 2000. Forest area in Belgium could have increased (since 2007) due to grassland conversion; therefore, our assessment concluded a specified risk for this vegetation type (mainly for privately owned land). Any biomass sourcing from forests established after 2007 triggers the verification of the vegetation type in January 2008. Signs of conversion or degradation of high biodiverse grasslands excludes biomass sourcing.</p>
<p><b>(vi)<sup>4</sup> That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.</b></p> <p><i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i></p> <p><i>(e) <b>heathland</b> - Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).</i></p>	
<b>Type of Risk Assessment used</b>	<input type="checkbox"/> Level A – proof at national or sub-national level <input checked="" type="checkbox"/> Level B – management system at forest sourcing area level
<b>Level A risk assessment description</b>	N/A
<b>Level B management system at the level of the forest sourcing area</b>	<p>Large tracks and small patches of heathland are present across these regions and excluded from biomass sourcing (No-Go areas). Most of these areas are found in protected areas and parks (mainly in Flanders). Our company and our suppliers are trained to identify heathland. The heathlands are highly fragmented, which reduces species richness and disrupts community structure. Nitrogen deposition adds further pressure by enriching the naturally nutrient-poor soils, leading to the</p>



	decline of characteristic heathland plants. Research also shows that regeneration is hampered, with reduced seed viability and weakened establishment of species such as common juniper. Reported heathland area varies depending on whether dry and wet heath (habitats 4030/4010) and dune-heath mosaics are included. In Flanders, estimates range between 8,000 and 10,000 ha, while Wallonia contains only small and fragmented heath patches. Overall, heathlands in Belgium depend entirely on active conservation management; both habitat loss and ecological pressures continue to threaten their long-term survival.
<p><b>(vi)<sup>5</sup> That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.</b></p> <p><i>Article 29 (4): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status: (a) <b>wetlands</b>, namely land that is covered with or saturated by water permanently or for a significant part of the year (NOTE: Evidence of verification of wetlands should reflect seasonal changes within a year).</i></p>	
<b>Type of Risk Assessment used</b>	<input type="checkbox"/> Level A – proof at national or sub-national level <input checked="" type="checkbox"/> Level B – management system at forest sourcing area level
<b>Level A risk assessment description</b>	N/A
<b>Level B management system at the level of the forest sourcing area</b>	<p>Flanders (since 2007). Independent assessments show ongoing wetland decline (2007–2012) driven by drainage, urbanisation/infrastructure, and pollution, but not by afforestation. Policy-led restoration (for example, SIGMA floodplains, VMM Wetlands4Cities) has removed some floodplain plantations. Afforestation is screened via the natuuroets; planting on wetlands is constrained. No findings that forestry has driven wetland conversion since 2007. Wallonia (since 2007). Many wetland habitats remain in unfavourable status due to hydrological alteration, pollution, and development, but there are no new forest plantings. LIFE projects prioritise open-wetland restoration, including removal of conifers on peat. CAP conditionality (BCAE-2, 2023) adds explicit on-farm wetland protections. Since 2007, conversion risk has decreased; but non-forestry conversions persist at a low level. Areas already converted to urban/infrastructure by 2025 are not a possible sourcing area. Biomass sourcing on wetlands trigger targeted biodiversity investigations to detect and address any deterioration of habitats. Any conversion plans will become apparent. The risk of wetland conversion is low. However, our company remains vigilant. Any indication of wetland conversion is investigated. Where confirmed, biomass sourcing is excluded, unless the loss of wetlands is demonstrably compensated.</p>
<p><b>(vi)<sup>6</sup> That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.</b></p> <p><i>Article 29 (5): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was <b>peatland</b> in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.</i></p>	
<b>Type of Risk Assessment used</b>	<input type="checkbox"/> Level A – proof at national or sub-national level <input checked="" type="checkbox"/> Level B – management system at forest sourcing area level
<b>Level A risk assessment description</b>	N/A



<b>Level B management system at the level of the forest sourcing area</b>	Flanders (since 2007). Peatlands are scarce remnants. Principal pressures are drainage, eutrophication, and legacy land use; no evidence of post-2007 conversion to forest. SIGMA and LIFE projects (e.g., Grote Netevallei, Schelde estuary) remove conifers and restore hydrology. The natuurtoets blocks afforestation on peat; forestry-driven loss is negligible. Wallonia (since 2007). The largest peatlands (Hautes Fagnes) are designated as Natura 2000 and nature reserves with hydrological plans. Pressures relate to climate and recreation, not afforestation. LIFE and the EU Peatlands & Heathlands programme prioritise restoration, including removal of spruce on peat. Since 2023, CAP conditionality (BCAE-2) adds protection. Overall risk of conversion is low.
<b>(vii) that installations producing biomass fuels from forest biomass, issue a statement of assurance, underpinned by company-level internal processes, for the purpose of the audits conducted pursuant to Article 30(3), that the forest biomass is not sourced from the lands referred to in point (vi).</b>	
<b>Type of Risk Assessment used</b>	<input checked="" type="checkbox"/> Level A – proof at national or sub-national level <input type="checkbox"/> Level B – management system at forest sourcing area level
<b>Level A risk assessment description</b>	N/A
<b>Level B management system at the level of the forest sourcing area</b>	<i>Not applicable, requirement only applies to Level A</i>

<b>LULUCF criteria 29(7)</b>	
<b>Type of Risk Assessment used</b>	<input checked="" type="checkbox"/> Level A – proof at national or sub-national level <input type="checkbox"/> Level B – management system at forest sourcing area level
<b>Level A risk assessment description</b>	SBP-endorsed REDII Level A risk assessment for Article 29(7) LULUCF
<b>Level B management system at the level of the forest sourcing area</b>	N/A

## Annex 2a: EU RED II Supply Base Evaluation

## Annex 3: SBP Processing residues and/or Post-consumer feedstock requirements

☐ Not Applicable (Processing Residues and/or post-consumer feedstock not used)

### Verification and monitoring of suppliers

Our company verifies all its suppliers. Firstly, every supplier signs an PEFC/SBP/RED self-declaration. Secondly, each supplier is visited and evaluated. Every type of feedstock of each supplier is assessed separately (comprehensive checklist). When needed, risk mitigation measures are agreed upon with suppliers. This evaluation is performed once a year and more often if there are risks in the supply chain. The evaluation reports are stored along with the collected documents and photos.

### Feedstock inspection and classification upon receipt

RED compliance for all types of feedstock and biomass is verified before and during procurement. Our company maintains tables of approved suppliers and their feedstock categories to facilitate verification of transport documents and invoices. Upon delivery, the correct feedstock or biomass type is visually checked. If there are supply chain risks, a reference sample may be retained. Procurement of RED-compliant feedstock and biomass is systematically documented.

### Supplier audit for processing residues and post-consumer feedstock

All processing residues and post-consumer feedstock/biomass within the scope of RED evaluations is inspected at its point of first occurrence. The processes generating the residues and wastes are assessed. Checked is also if the supplier has equipment onsite that could process feedstock/biomass in such a way that it seems to be wood residues or wastes.

## Annex 4: EU RED detailed findings for Trees Outside Forest (TOF) feedstock

*NOTE: For “Trees outside forests (TOF) – Urban and landscape feedstock” no EU RED sustainability requirements apply, only the GHG savings criteria apply (SBP EU RED Bridging ID v2.0 Section 1.1). The land use category in this case is neither forest land nor agricultural land. For “Trees outside forests (TOF) – Agricultural land feedstock” the applicable criteria are Article 29 paragraphs (2)-(5).*

### Country: France - European areas

Not Applicable - only urban and landscape feedstock is used

### Country: Germany

Not Applicable - only urban and landscape feedstock is used

### Country: Belgium

Not Applicable - only urban and landscape feedstock is used

### Country: Netherlands - European area

Not Applicable - only urban and landscape feedstock is used

### Country: Luxembourg

Not Applicable - only urban and landscape feedstock is used

## Annex 4a: RED II detailed findings for Trees Outside Forest (TOF) feedstock

*NOTE: For “Trees outside forests (TOF) – Urban and landscape feedstock” no REDII sustainability requirements apply, only the GHG savings criteria apply (SBP REDII Bridging ID Section 4.2). The land use category in this case is neither forest land nor agricultural land. For “Trees outside forests (TOF) – Agricultural land feedstock” the applicable criteria are Article 29 paragraphs (2)-(5).*