

Public report
on the assessment of

certification scheme
FSC International
(request for advice from December 2017)

against the Dutch legal sustainability criteria
for solid biomass for energy applications

by the

Advisory Commission on Sustainability
of Biomass for Energy Applications

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1 Introduction

1.1 Dutch sustainability criteria for solid biomass for energy applications

In September 2013 more than 40 Dutch government bodies, companies and non-governmental organisations endorsed the National Energy Agreement for Sustainable Growth. Part of this Agreement deals with targets for the more sustainable use of energy in the years 2020 and 2023. Bio-energy plays an important role in meeting these targets. It was also agreed that sustainability criteria would be formulated for the large-scale application of biomass for cofiring in coal-fired power plants, and that these sustainability criteria would include forest management and climate aspects like greenhouse gas emissions, carbon debt and indirect land use change.

A working group with representatives from energy companies, environmental organisations and the government has further developed the sustainability criteria into principles and underlying criteria. As from 2015 these principles and criteria have been included as a condition in the subsidy regulation SDE+ for cofiring and for production of industrial steam from wood pellets, and from beginning 2018 these principles and criteria are laid down in environmental legislation. In order to demonstrate compliance with these principles and criteria, companies need to demonstrate that the biomass used fully meets the legal requirements. This can be achieved by use of certification schemes and/or by use of the verification protocol approved for this purpose by the Dutch minister of Economic Affairs and Climate Policy (minister of EZK).

1.2 The advisory commission sustainability biomass for energy applications

The independent advisory commission on sustainability of biomass for energy applications (further in this document “commission” or “advisory commission” or “ADBE”) is installed by the Dutch government. The commission advises the minister of EZK on the extent to which certification schemes comply with the sustainability criteria in the Dutch legal *‘regeling conformiteitsbeoordeling vaste biomassa voor energietoepassingen’*. The commission only gives advice on request of the minister, who receives applications for approval of certification schemes and has to decide on the approval. The minister of EZK will approve certification schemes per individual sustainability criterion, and will only approve schemes which address all management criteria. The use of a certification scheme leads to one or a number of claims (for instance the claim “FSC 100%”). The ADBE will advise which Dutch legal sustainability criteria are covered by each claim of the scheme.

Energy companies can use the approved certification schemes and their claims to demonstrate that the solid biomass which they use complies with the Dutch legal sustainability criteria, either as “sustainable biomass” or as “controlled biomass”. Demonstrating compliance is a condition for receiving subsidy from the so-called [SDE+ subsidy scheme](#) for some applications of solid biomass. Certification schemes might not be approved for all sustainability criteria. In this case a combination of two or more certification schemes and/or a combination of certification and verification might be required to show compliance with all Dutch legal sustainability criteria.

1.3 Readers guide

In chapter 2 of this report the assessment procedure of the advisory commission plus the application by FSC International and the timeline of the assessment are briefly explained. Chapter 3 gives a summary of the findings from the assessment by the commission for the certification scheme FSC International. In chapter 4, details on the commission’s judgement are given, and chapter 5 lists the documents that were used for this assessment. This report comes with three annexes: the first annex gives the results of the assessment of a sample of FSC National Forest Stewardship Standards (NFFSs), the second annex gives background on requirements for biomass categories and the Chain-of-Custody (CoC) system from Dutch legislation, and the third annex lists the abbreviations that are used in this report.

2 The commissions' assessment procedure and assessment of FSC

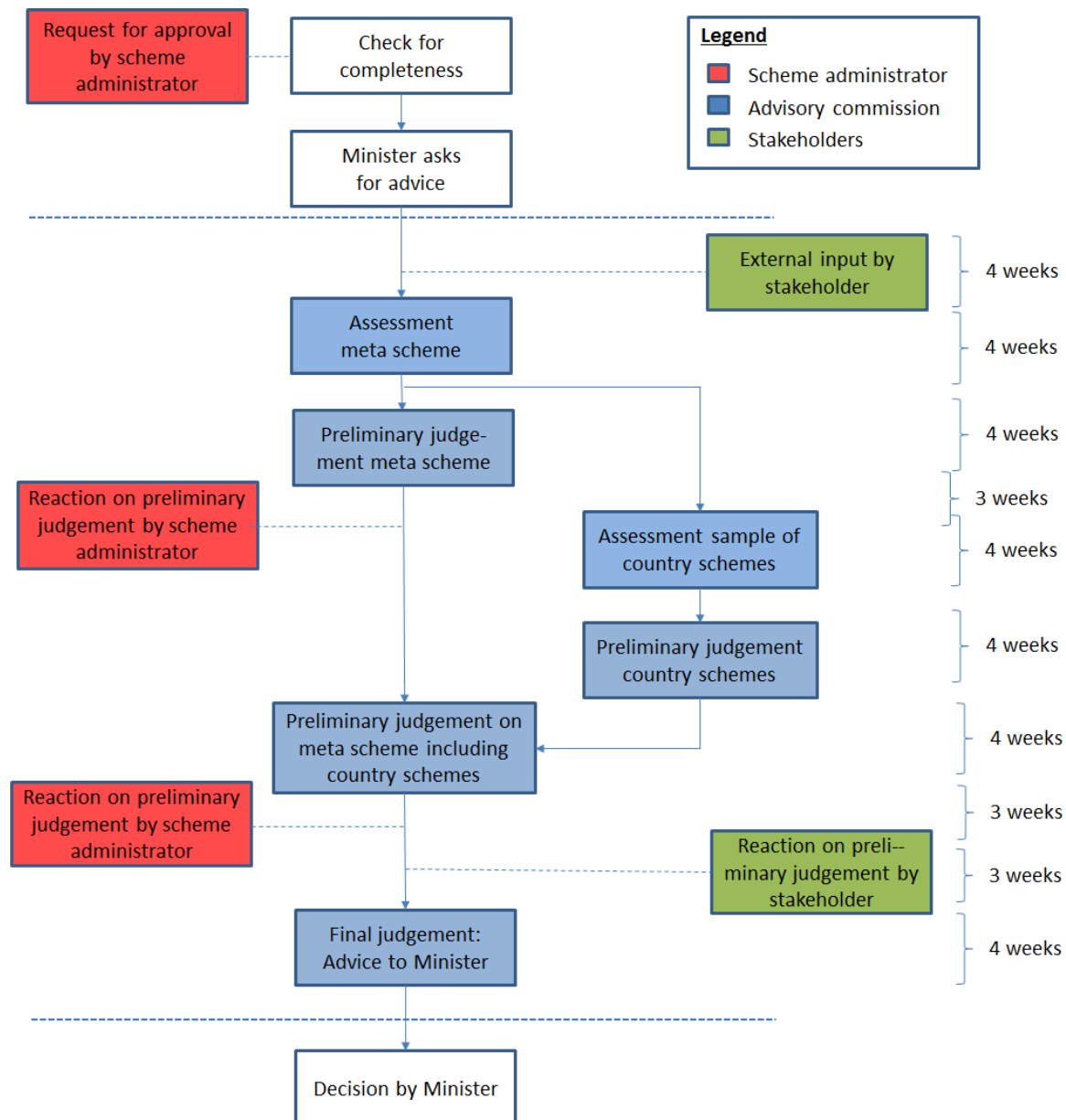
2.1 Assessment protocol

The assessment procedure of the advisory commission is described in a document called "toetsingsprotocol" (assessment protocol). The actual version of this protocol can be found on the [website of the advisory commission](#). The assessment protocol is available in Dutch language only. An English summary of the assessment procedure can be found on [this webpage](#).

The current application of the certification scheme FSC International is assessed using version 2.1 of the assessment protocol.

2.2 Summary of the assessment procedure

The commission has decided that for the assessment of meta schemes a sample of approved or endorsed country schemes will be assessed. The assessment procedure for meta schemes is visualised in the figure below.



2.3 Application by FSC International

The FSC International scheme manager made an application to the Dutch ministry of EZK in which approval of FSC International is requested for:

- the Dutch sustainability criteria under Principles P3 - P4 and P6 - P13;
- for biomass categories 1 and 2; and
- geographical coverage “global”.

The FSC International certification scheme generates different claims such as “FSC 100%”, “FSC Controlled Wood” and “FSC Mix x%”. In the application form, the FSC International scheme manager indicated that the FSC chain of custody requirements include controlled biomass.

In reply to a question by the commission, the FSC International scheme manager indicated that the application includes national and regional FSC schemes that are approved by FSC International, for further details see paragraph 2.4.

The following FSC International scheme documents were used for the assessment of FSC International:

- FSC-POL-30-001 (2005) FSC Pesticides Policy
- FSC-PRO-01-001 (V3-1) The development and revision of FSC normative documents
- FSC-PRO-01-005 (V3-0) Processing appeals
- FSC-PRO-01-008 (V2-0) Processing complaints in FSC certification scheme
- FSC-PRO-01-009 (V3-0) Processing policy for association complaints in the FSC® certification scheme
- FSC-STD-01-001 (V5-2) FSC Principles and Criteria for Forest Stewardship
- FSC-STD-01-002 (2017) FSC Glossary of terms
- FSC-STD-20-001 (V4-0) General requirements for FSC accredited certification bodies
- FSC-STD-30-001 (V1-0) Indicators and thresholds for the identification of ‘highly hazardous’ pesticides (HHP)
- FSC-STD-30-001A (2017) FSC List of 'Highly hazardous' pesticides
- FSC-STD-30-005 (V1-0) FSC Standard for Group Entities in Forest Management Groups
- FSC-STD-30-010 (V2-0) FSC Controlled Wood Standard for Forest Management Enterprises
- FSC-STD-40-003 (V2-1) Chain of custody certification of multiple sites
- FSC-STD-40-004 (V3-0) Chain of Custody Certification
- FSC-STD-40-005 (V3-1) FSC Requirements for Sourcing FSC Controlled Wood
- FSC-STD-60-004 (V1-0) International Generic Indicators
- FSC-STD-60-006 (V1-2) The development and revision of National Forest Stewardship Standards
- FSC-DIR-20-007 EN FSC Directive on FSC FM Evaluations
- FSC-PRO-30-001 V1-0 EN Pesticide Derogation Procedure
- FSC-PRO-30-001a EN List of approved derogations for use of HHP
- FSC-PRO-60-007 V1-0 EN Structure, Content and Development of INS's
- FSC-STD-01-2010 USA Natural and Plantations
- FSC Dispute Resolution process

In addition, a number of scheme documents were used for the assessment of three National Forestry Stewardship Standards (NFSSs) from Bulgaria, Canada and Portugal, paragraph 5.3 lists the documents that were used for that part of the assessment.

2.4 Timeline of the FSC International assessment

The commission received a request for advice on the FSC International application on December 18, 2017. The commission started with assessing the FSC International scheme documents and completed this part of the preliminary judgement early March 2018. This preliminary judgement was send for comments to the scheme manager (March 6).

Meanwhile the FSC scheme manager had confirmed that the FSC International application included the approved National Forestry Stewardship Standards (NFSSs). After an internal discussion and after asking and receiving feedback from the FSC International scheme manager (between Feb. 28 and March 14th) the commission decided that for meta schemes it would perform an assessment amongst approved/endorsed national or regional schemes. This decision was publicly announced on April 17, 2018 (both [in Dutch](#) and [in English](#) language). The commission decided to include the NFSSs from Bulgaria and Portugal (approved for FSC P&C V5.2) and the draft NFSS from Canada in the sample. Further details on the setup and assessment of the sample of NFSSs can be found in Annex A.

The complete preliminary judgement including the assessment of the sample of NFSSs and the draft stakeholder report were sent to the FSC International scheme manager for feedback early July 2018. Feedback was received August 23, 2018. On the same date the draft stakeholder report was sent for comments to the stakeholders that provided external input. On October 24, 2018 the commission came to its final judgement, which is described in this report plus in the stakeholder report (see next paragraph). The advice that the commission has sent on October 25, 2018 to the minister of EZK consists of a cover letter plus these two reports.

2.5 External input

Stakeholders have been given the opportunity to submit external input to the commission during the first four weeks of the procedure (see also paragraph 2.2). This input plus a response by the commission formed the input for a separate stakeholder report. For the certification scheme FSC International, external input from two (groups of) stakeholders was received.

3 Summary of findings on certification scheme FSC International

A summary of the commission's findings on the application for approval by the certification scheme FSC International is given in the four paragraphs of this chapter 3. Details on the commission's findings are given in chapter 4 "Full assessment tables for certification scheme FSC International" and in Annex A on the assessment of a sample of NFFSs. In chapter 4 reference is made to the "Dutch regulation", which is the Dutch legal *regeling conformiteitsbeoordeling vaste biomassa voor energietoepassingen*. The sustainability and management criteria referred to by the numbers in this chapter and listed in chapter 4 are copied from the Dutch regulation¹.

The commission's judgement, based on the combined findings as described below, is that FSC International can be approved for the sustainability criteria 3.3, 4.1, 6.1, 6.2, 6.3, 7.1, 7.2, 7.3, 7.4, 7.5, 8.1, 8.2, 8.3, 8.4, 8.5, 8.6, 8.7, 8.8, 9.1, 9.2, 10.1, 10.2, 10.3, 10.4, 10.5, 11.1 and 11.2 for biomass categories 1 and 2. This judgement applies to the FSC claim "FSC 100%" and is based on the version "Principles and Criteria version 5" (P&C V5) of FSC International (e.g. scheme documents FSC-STD-01-001 V5-2 and FSC-STD-60-004 V1-0) and National Forest Stewardship Standards (NFFSs) that are FSC-approved for P&C V5. As FSC approval against P&C V5 is an ongoing process, the commission advises to approve FSC International for a geographical scope "all countries and regions with P&C V5 approved National- or Regional Forest Stewardship Standards which are effective". Currently (mid October 2018) the geographical scope of the FSC International approval would be Bulgaria, China, Denmark, Germany, Italy, Metropolitan France, Portugal, Tanzania, Uganda and United Kingdom. The addition "which are effective" is made as the effective data is later than the date of FSC approval. After approval, also publication in the FSC document center takes a number of months. An example is the NFFS of Bulgaria which was approved in October 2016 and which has an effective date of August 16, 2017.

The commission advises not to approve FSC national or regional standards that are FSC approved for earlier versions of the FSC meta scheme because earlier versions were not part of the request for approval. These national or regional standards should apply for approval separately.

For the claim "FSC Controlled Wood", the commission advises to approve FSC International for sustainability criteria 7.1 and 7.3 for biomass categories 1 and 2 and with geographical scope "worldwide".

The commission also advises to approve FSC International for the CoC criteria 12.1, 12.3, 12.6, 13.1, 13.2 and 13.3 for biomass categories 1 and 2 and for a geographical scope "worldwide". FSC International partly addresses sustainability criterion 12.4 and 12.5, the table in paragraph 4.3 shows which parts of these criteria are addressed.

3.1 Findings on classification of biomass and on the first link in CoC to be certified

FSC International requested approval for wood from forest land (biomass category 1 and 2). The commission has concluded that information on the size of the FMU is available through a combination of the FSC-COC-number of the invoice plus data recorded on <https://info.fsc.org/>. As a result, the commission advises to approve FSC for category 1 and 2 biomass. The distinction between category 1 and 2 biomass is relevant for Dutch sustainability criterion 5.1, for which category 2 biomass is exempted. FSC International did not apply for approval for the "regional risk based approach".

FSC certification starts at the forest management level, so the conditions on the first link in the Chain-of-Custody (CoC) from Table 2 in Annex D of the Dutch regulation are met.

¹: *Regeling conformiteitsbeoordeling vaste biomassa voor energietoepassingen*
(translated: "Dutch regulation on conformity assessment solid biomass for energy applications")

3.2 Findings for management criteria

A certification scheme can only be approved if the scheme complies with all management criteria. The ADBE concludes that FSC International complies with all management criteria.

3.3 Findings for individual sustainability criteria

The minister of EZK will approve certification schemes per claim and per individual sustainability criterion from the Dutch regulation. The commission has assessed compliance against the Dutch sustainability criteria for two FSC International claims: the claim “FSC 100%” and the claim “FSC controlled wood”. The claim “FSC Mix x%” is a combination of these two claims as is further explained in paragraph 3.3.2.

In the two paragraphs below, the tables only show the names of the principles, they do not show names or descriptions of the individual criteria. Please refer to the table in paragraph 4.3 for further details. Green colours indicate the criteria for which the ADBE gives a positive advice.

3.3.1 Findings for the claim “FSC 100%”

For the claim “FSC 100%”, the table below summarises the findings of the advisory commission per individual sustainability criterion from the Dutch regulation for biomass categories 1 and 2.

Principle	Number of the criterion as related to the respective principle to the left							
	1	2	3	4	5	6	7	8
P1: GHG emissions	Grey							
P2: Soil quality	Grey							
P3: Carbon sinks	Red	Red	Light green					
P4: Long-term carbon debt	Light green	Red	Red					
P5: Indirect Land Use Change (ILUC)	Grey							
P6: Laws and regulations	Light green	Light green	Light green					
P7: Biodiversity	Light green	Light green	Light green	Light green	Light green			
P8: Regulating effect and quality, health and vitality of forest	Light green	Light green	Light green	Light green	Light green	Light green	Light green	Light green
P9: Production capacity, safeguard future of forests	Light green	Light green						
P10: Management system	Light green	Light green	Light green	Light green	Light green			
P11: Forest management by a group or regional association	Light green	Light green						
P12: Chain of custody system	Light green	Red	Light green	Orange	Orange	Light green		
P13: Chain of custody system for a group	Light green	Light green	Light green					

Legend (scoring table)

Colour	Score	Meaning
Dark green :	3	The sustainability criterion is fully addressed by FSC International.
Light green :	2	The sustainability criterion is largely addressed the FSC International. Supplementary verification or another approved certification scheme is not needed.
Orange :	1	The sustainability criterion is partly addressed by FSC International. Supplementary verification or another approved certification scheme is needed for those elements that are not addressed.
Red :	0	The sustainability criterion is not or is insufficiently addressed by FSC International. Additional verification or another approved certification scheme is required for the entire sustainability criterion.
Grey :		No request for approval.

3.3.2 Findings for the claims “FSC Mix x%” and “FSC Controlled Wood”

FSC International also applied to be approved for controlled biomass. Dutch controlled biomass is category 1 and 2 biomass complying with Dutch sustainability criteria 1.1, 3.1, 3.2, 3.3, 4.1, 4.2, 4.3, 5.1, 7.1, 7.3, 12.1, 12.2, 12.3, 12.4, 12.5 and 12.6.

For the claim “FSC Controlled Wood”, the table below summarises the commissions’ findings per individual sustainability criterion from the Dutch regulation.

The commission advises to approve this claim for geographical scope “worldwide” as the two FSC Controlled Wood documents as well as the FSC CoC document apply worldwide and are used for certification.

The commission further notes that the claim “FSC Mix x%” is a combination of a claim “FSC 100%” and “FSC Controlled Wood” and hence the commission did not assess the claim “FSC Mix x%”. The claim “FSC Mix x%” can – by the end user when preparing a conformity year statement – be interpreted as x% FSC 100% and (100 – x)% FSC Controlled Wood.

Principle	Number of the criterion as related to the respective principle to the left							
	1	2	3	4	5	6	7	8
P1: GHG emissions	Grey							
P3: Carbon sinks	Red	Red	Red					
P4: Long-term carbon debt	Red	Red	Red					
P5: Indirect Land Use Change (ILUC)	Grey							
P7: Biodiversity	Light green		Light green					
P12: Chain of custody system	Dark green	Red	Dark green	Orange	Orange	Dark green		

Legend (scoring table)

Colour	Score	Meaning
Dark green :	3	The sustainability criterion is fully addressed by the claim “FSC controlled wood”.
Light green :	2	The sustainability criterion is largely addressed the claim “FSC controlled wood”. Supplementary verification or another approved certification scheme is not needed.
Orange :	1	The sustainability criterion is partly addressed by the claim “FSC controlled wood”. Supplementary verification or another approved certification scheme is needed for those elements that are not addressed.
Red :	0	The sustainability criterion is not or is insufficiently addressed by the claim “FSC controlled wood”. Additional verification or another approved certification scheme is required for the entire sustainability criterion.
Grey :		No request for approval.

4 Assessment tables for certification scheme FSC International

This chapter contains four paragraphs on respectively a number of general topics of the FSC International application (4.1), on the management criteria (4.2) on the sustainability criteria for the claim “FSC 100%” (4.3) and on the sustainability criteria for the claim “FSC controlled wood” (4.4). The scores “3”, “2”, “1” and “0” plus the colours that are used in the tables in this chapter, are explained in the legend on the previous page.

4.1 Assessment of classification of biomass and on first link in CoC to be certified

Annex D of the Dutch regulation contains two tables (which are copied into Annex B of this report) with a number of general requirements on biomass categories and on the first link in the CoC to be certified. The ADBE has assessed whether FSC International meets these requirements. One important aspect is whether FSC International can make a distinction between the five biomass categories.

FSC International requested approval for wood from forest land (biomass category 1 and 2). The commission has concluded that information on the size of the FMU is available through a combination of the FSC-COC-number of the invoice plus data recorded on <https://info.fsc.org/>. As a result, the commission will advise to approve FSC for category 1 and 2 biomass. The distinction between category 1 and 2 biomass is relevant for Dutch sustainability criterion 5.1, for which category 2 biomass is exempted. FSC International did not apply for approval for the “regional risk based approach”.

For the claim FSC 100%, FSC certification starts at the forest management level, so the conditions on the first link in the Chain-of-Custody (CoC) from Table 2 in Annex D of the Dutch regulation are met for the claim “FSC 100%”. For the claim “FSC controlled wood this condition is checked in paragraph 4.4.

4.2 Assessment table for management criteria

The table below contains details of the assessment of the advisory commission on the FSC International certification scheme against the Dutch management criteria from the “regeling conformiteitsbeoordeling vaste biomassa voor energiedoeleinden”.

Management criterion from the Dutch “regeling conformiteitsbeoordeling vaste biomassa voor energiedoeleinden”		ADBE judgement on whether FSC International complies with the management criteria	Score
1	A widely supported need exists for the scheme and for the conformity assessments that are performed based on the scheme.	FSC was established in 1993, as a follow-up to the United Nations Conference on Environment and Development (the Earth Summit at Rio de Janeiro, 1992). As FSC is organised in three chambers on environmental, economic and social interests, the scheme is broadly supported. FSC has over 1500 certificate holders and worldwide almost 200 million hectares of forest is FSC-certified. Therefore, the commission concludes that management criterion 1 is fully addressed by FSC International.	3
2	The development of the scheme is transparent and participation in the process of development of the scheme is open to anyone.	The commission observed that the procedures FSC-STD-60-006 and FSC-PRO-01-001 for development or updates of the scheme are described clearly and are available online. Scheme development is therefore considered transparent. The commission also noted that the consultative forum is open to any stakeholder on request, and therefore the development of the scheme is open to anyone. The commission also concludes that the three NFSSs from the sample comply with this management criterion, further	3

		<p>details are given in Annex A to this report.</p> <p>As a result, the commission concludes that management criterion 2 is fully addressed by FSC International.</p>	
3	<p>The methods related to the development of the scheme are documented and at least include the organisations participating in the development of the scheme and the decision-making process for the development of the scheme.</p>	<p>The commission observed that the proposal, all comments and reports on a) summary of the development process, b) summary of the main aim and objectives of the document c) evaluation of the likely impacts (..) d) explanation of the main issues and concerns raised during the process (..) and e) records of any outstanding concerns (..) are recorded by FSC. Also the decision-making process is recorded. Some aspects are documented publicly, others are available for the working group. The consultative forum is informed at each stage and their comments are recorded. According to FSC the members of the consultative forum for each of the public consultations are listed.</p> <p>The commission concludes that management criterion 3 is fully addressed by FSC International through FSC-PRO-01-001 V3-1 (chapters 2, 3, 5 and 7) and FSC-PRO-01-001 V3-1 (chapters 4, 6, 7 and 16). In addition the commission concludes that a membership list (all membership organizations that can take part in General Assemblies and Board Elections) is public at http://memberportal.fsc.org/ and that the three NFSSs from the sample comply with this management criterion (see Annex A for further details).</p>	3
4	<p>It can be demonstrated that during the development of the scheme and as part of the scheme management expertise of the sustainability requirements covered by the scheme is applied.</p>	<p>FSC's criteria specifically mention that expert knowledge is a requirement in the working groups that are developing the scheme, for instance in FSC-PRO-01-001 (criteria 3.9 and 3.13) and in FSC-STD-60-006 (V1-2) (criterion 3.2). The commission has concluded that the necessary expertise was applied when developing the three NFSSs from the sample (see Annex A). As a result, the commission concludes that management criterion 4 is fully addressed by FSC International.</p>	3
5	<p>The scheme is publicly available or accessible under fair, reasonable and non-discriminatory conditions.</p>	<p>As all normative documents are available online and are accessible freely via https://ic.fsc.org/en/document-center, the commission concludes that management criterion 5 is fully addressed by FSC International.</p>	3
6	<p>The scheme manager limits the use of the scheme to the conformity assessment bodies he has entered into an agreement with, unless the scheme owner itself is the only conformity assessment body.</p>	<p>FSC International has indicated – in response to questions by the commission – that an agreement (in the form of a contract) between scheme operator and conformity assessment bodies (CABs) takes place not at the national but rather at international level between FSC International and the CABs, and that there is no official FSC document where this requirement is made explicit. FSC International added that “such a contract however initiates the official start of the cooperation and licensing. So even if not included in a normative FSC document, it is common sense that one needs to enter into a contract first”.</p> <p>The commission has checked with two CABs to confirm that they need to enter into a contract with FSC International before they can perform FSC audits, and the two CABs confirmed that this is correct. The commission also observed that – through this agreement – the FSC General Director grants the rights to use the scheme to the certification body. As a result, the commission concludes that also the three NFSSs fully address management criterion 6 through contracts required for by FSC International.</p>	3
7	<p>The scheme manager has enforced effective procedures for handling complaints and appeal. Appeal is treated by persons that are not directly involved in the development and the management of the document.</p>	<p>The commission noted that FSC International has clear procedures for complaints and appeals. The appeals have to be handled by impartial persons free to the applicant and the appeal and the person(s) shall not have an interest in the outcome, implying that the person(s) are not allowed to be directly involved in the development and the management of the document [that is under appeal].</p> <p>The commission has also concluded that the NFSSs have procedures for handling complains and appeal, further details on this part of the assessment are given in Annex A.</p> <p>The commission concludes that management criterion 7 is fully addressed by FSC International.</p>	3
8	<p>The scheme manager has a scheme version management system in place.</p>	<p>All normative documents from FSC International have a clearly indicated version number. An updated standard receives a new version number (criterion 12.1 in FSC-STD-60-006 (V1-2)) which shows that a scheme version management system is in place. The maximum revision period is 5 years. The commission concludes that management criterion 8 is fully addressed by FSC International.</p>	3

4.3 Assessment tables on sustainability criteria for the claim “FSC 100%”

The minister of EZK will approve certification schemes per claim from the certification scheme and per individual sustainability criterion from the Dutch regulation.

The commission has assessed whether the certification scheme FSC International addresses the Dutch sustainability criteria from the Dutch regulation. The assessment results for the claim “FSC 100%” are given in the tables below. The first table lists a general point of attention that the commission found during its assessment.

As FSC International did not request approval for the sustainability criteria under principles P1, P2 and P5, the commission has not assessed whether the claim “FSC 100%” demonstrates compliance with the sustainability criteria 1.1, 2.1 and 5.1 from the Dutch regulation.

General point of attention		
A	<u>Approval of National Forest Stewardship Standards (NFSSs)</u>	Given the fact that during the development of a National Forest Stewardship Standard the IGI’s can be allowed to be adapted or dropped, it is not certain that – when FSC International addresses (through scheme documents FSC-STD-01-001 V5-2 and FSC-PRO-60-006 V2-0) a certain Dutch sustainability criterion – this criterion is also addressed by the NFFS. As a consequence, the commission has decided to assess also a number of NFFS’s as a sample, see Annex A for the results of this separate assessment.

Principle 3: Production of raw biomass does not result in the destruction of carbon sinks			
Sustainability criterion from the Dutch “regeling conformiteitsbeoordeling vaste biomassa voor energiedoeleinden”		ADBE judgement on whether “FSC 100%” biomass complies with the sustainability criteria	Score
3.1	Biomass is not sourced from permanently drained land that was classified as peat land on 1 January 2008, unless it can be demonstrated that the production and harvesting of the biomass does not result in water depletion of a previously undrained soil.	FSC does not mention a historical cut-off date (2008) for not using drained land that was classified as peat land on 1 January 2008 – this means that the requirement applies only to the current FSC-certified land (the requirement does partly not apply to an FMU that has been certified after 2008 with peat lands). As a result, there is a gap in the protection of peatlands between 2008 and the period of certification. The commission concludes that FSC International protects peatland from the moment the FMU is certified, but as a historical cut-off date (2008) is not included in FSC Dutch criterion 3.1, it is insufficiently addressed by FSC International.	0
3.2	Biomass is not sourced from land that was converted from wetland to an alternative, dryer ecosystem after 1 January 2008.	Criterion 9.1 from FSC-STD-01-001 V5-2 stipulates that the Organization shall assess and record the presence and status of HCVs in the FMU. They are protected. This includes ecosystems (HCV3). Criterion 6.7 from FSC-STD-01-001 V5-2 requires protection of natural water courses. In the IGI one of the management indicators states that “Wetlands*, peatlands*, savannahs or natural grasslands* are not converted to plantations* or any other land use”. However, FSC does not mention a historical cut-off date (2008) for conversion of wetlands to drier ecosystems. As a result, the commission concludes that Dutch criterion 3.2 is insufficiently addressed by FSC International.	0
3.3	Biomass is not sourced from wood plantations that	FSC requires that FMUs containing plantations that were established on areas converted from natural forest after	2

<p>were created by means of conversion of natural forests after 31 December 1997, unless the forest manager is not directly or indirectly responsible for the conversion. Biomass originating from wood plantations that were created after 1997 by means of conversion of degraded natural forests or degraded land is exempt from this requirement on condition that it is ecologically and economically justified to do so and that the forest manager is not directly or indirectly responsible for the degradation.</p>	<p>November 1994 shall not qualify for certification (criterion 6.10 from FSC-STD-01-001 V5-2). There is an exception for this requirement when clear and sufficient evidence is provided that The Organization is not directly or indirectly responsible for the conversion. This is comparable to the Dutch criterion. The commission concludes that Dutch criterion 3.3 is addressed by FSC International, based on FSC criterion 6.10 from FSC-STD-01-001 V5-2. The fact that FSC allows an exception for a very limited portion of the area of the FMU causes the commission to conclude that FSC International largely addresses the Dutch criterion.</p>	
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Principle 4: The use of biomass does not result in a long-term carbon debt

Sustainability criterion from the Dutch "regeling conformiteitsbeoordeling vaste biomassa voor energiedoeleinden"		ADBE judgement on whether "FSC 100%" biomass complies with the sustainability criteria	Score
4.1	The forest management unit where the wood is sourced is managed with the aim of retaining or increasing carbon stocks in the medium or long term.	The commission concludes that Dutch criterion 4.1 is fully addressed by FSC International based on FSC criteria 5.2 and 6.3 from FSC-STD-01-001 V5-2 in combination with the definition of environmental values which includes "ecosystem functions (including carbon sequestration and storage)"	3
4.2	Biomass is not sourced from stumps unless these stumps had to be removed from the site for other reasons than wood or biomass production.	Harvesting of stumps is not explicitly excluded under FSC. Stumps are not mentioned in the FSC principles and criteria. Although criteria 10.11.1-10.11.4 from FSC-STD-60-004 V1-0 require that harvesting practices are such that environmental values (such as carbon storage) are conserved, soils are protected (possibly avoiding the extraction of stumps) and sufficient amounts of dead and decaying wood (which might include stumps) are retained, this does not ensure that stumps are not used for bio-energy. As a result, the commission concludes that sustainability criterion 4.2 is insufficiently addressed by FSC.	0
4.3	On average less than half the volume of the annual round wood harvest from forests is processed as biomass for energy generation. Round wood from thinnings or from production forests with a rotation period of 40 years or less is exempt from this requirement.	FSC requires that the FSC certified organization enables the production of diversified benefits and/or products (criterion 5.1 from FSC-STD-01-001 V5-2), which indicates that there should be multiple benefits and/or products. FSC does not set a threshold for this. FSC does recognize that biomass can be used for energy purposes (FSC-STD-60-004 V1-0) and that care should be taken to maintain carbon sequestration and storage. As FSC does not include a requirement on the maximum share of roundwood used for energy purposes, the commission concludes that sustainability criterion is insufficiently addressed by FSC.	0

Principle 6: Relevant international, national, regional and local laws and regulations are complied with

Sustainability criterion from the Dutch "regeling conformiteitsbeoordeling vaste biomassa voor energiedoeleinden"		ADBE judgement on whether "FSC 100%" biomass complies with the sustainability criteria	Score
6.1	The forest manager holds the legal right to use the forest.	Based on FSC-STD-01-001 V5-2 criteria 1.1, 1.2 and 1.3, the commission concludes that Dutch sustainability criterion	3

		6.1 is fully addressed by FSC International.	
6.2	The forest manager complies with all obligations to pay taxes and royalties.	Based on FSC-STD-01-001 V5-2 criterion 1.3 and FSC-STD-40-004 V3-0 criteria 1.1 and 6.1 the commission concludes that Dutch sustainability criterion 6.2 is fully addressed by FSC International.	3
6.3	Anti-corruption legislation is complied with. If no anti-corruption legislation exists, the forest manager takes alternative anti-corruption measures proportionate to the scale and intensity of the management activities and the risk of corruption.	Criterion 1.7 from FSC-STD-01-001 V5-2 and the indicators under criterion 1.7 from FSC-STD-60-004 V1-0 EN require that the Organization shall comply with anti-corruption legislation where this exists. In the absence of anticorruption legislation, the Organization shall implement other anticorruption measures. As a result, the commission concludes that Dutch sustainability criterion 6.3 is fully addressed by FSC International.	3

Principle 7: Biodiversity is maintained and where possible enhanced			
Sustainability criterion from the Dutch "regeling conformiteitsbeoordeling vaste biomassa voor energiedoeleinden"		ADBE judgement on whether "FSC 100%" biomass complies with the sustainability criteria	Score
7.1	Sites with a high conservation value and representative areas of the forest types that are found in the forest management unit have been identified and are protected and where possible enhanced. The sites may contain one or more of the following values: diversity of species, ecosystems and habitats, ecosystem services, ecosystems at landscape level and cultural values.	Dutch criterion 7.1 consists of two parts (HCV's and representative areas). The first part on HCV's is covered by FSC International through FSC criteria 9.1 and 9.2 from FSC-STD-01-001 V5-2. The second part on representative areas of the forest types is covered by FSC International through FSC criteria 6.1, 6.5 and 6.6 from FSC-STD-01-001 V5-2. As a result, the commission concludes that Dutch sustainability criterion 7.1 is fully addressed by FSC International.	3
7.2	Measures have been taken to protect endangered plant and animal species and, if applicable, to increase the populations and enhance the habitats of these species.	Dutch criterion 7.2 consists of two parts. The first part on protecting endangered plant and animal species is covered by FSC-STD-01-001 V5-2 criterion 6.4 and the definitions of threatened species and rare species which are based on IUCN red lists. As the FSC definition of threatened species allows for a motivated deviation from the IUCN red lists (as a result of the wording "these categories may be re-interpreted for FSC purposes according to official national classifications (which have legal significance) and to local conditions and population densities (which should affect decisions about appropriate conservation measures)", the commission concludes that FSC International largely covers this first part of Dutch criterion 7.2. The commission cannot score "fully addressed" as a result of the strict definition of endangered plant and animal species from the Dutch legislation. The second part on enhancement of habitats and populations is covered through criterion 9.3 of FSC-STD-01-001 V5-2. The commission concludes that Dutch criterion 7.2 is largely addressed by FSC International.	2
7.3	The conversion of forests within the forest management unit to other forms of land use, including wood plantations, is not permitted unless: - the area concerned is small which means the total converted area over the years is no greater than 5% of the area of the forest management unit on benchmark date 1 January 2008; and	Similar to the Dutch sustainability criterion 7.3, FSC criterion 6.9 from FSC-STD-01-001 V5-2 forbids conversion of natural forests with a conditional 'unless'. The main part of the criterion is met by FSC as it forbids the same conversion and as the FSC definitions of natural forest and plantation come close to the Dutch definitions. FSC includes the same exceptions. Exception 2 and 3 from the Dutch criterion 7.3 are fully covered by FSC criterion 6.9. The first exception from the Dutch criterion reads "the area concerned is small which means the total converted area over the years is no greater than 5% of the area of the forest management unit on benchmark date 1 January 2008". FSC requires in criterion 6.9 that "the conversion affects a very limited portion of the area of the Management Unit", with "limited portion" defined (in the "Glossary of terms" as "the area affected shall not exceed 0.5% of the area of	2

	<ul style="list-style-type: none"> - it clearly leads to long-term advantages for nature conservation; and - there is no damage or threat of damage to sites with a high conservation value. 	<p>the Management Unit in any one year, nor affect a total of more than 5% of the area of the Management Unit"). The only two differences are therefore that (i) the Dutch criterion mentions a benchmark date of 1 January 2008 where FSC does not, and (ii) in case the land changes ownership there is a chance that the converted area which is under FSC certification surpasses the 5% limit of the Dutch criterion. The commission concludes that the risk that this will happen is fairly small, as this would require a large number of years where the conversion is (or approaches) 0.5%. As a result the commission concludes that Dutch criterion 7.3 is largely addressed by FSC International through FSC criterion 6.9 from FSC-STD-01-001 V5-2 plus the FSC definition (Glossary of Terms) of "very limited portion".</p>	
7.4	In the case of wood plantations, there is a preference for native species, and a relevant percentage of the plantation must be able to revert to natural forest at a later stage.	The Dutch criterion 7.4 consists of two parts. The first part on "preference for native species" is covered by FSC criterion 10.2 from FSC-STD-01-001 V5-2, the second part "a relevant percentage of the plantation must be able to revert to natural forest" is covered by FSC criterion 6.5 from FSC-STD-01-001 V5-2. The commission concludes that Dutch sustainability criterion 7.4 is fully addressed by FSC International.	3
7.5	Exploitation of non-timber forest products, including products from hunting and fishing, is regulated, monitored and controlled, among others to safeguard the maintenance of the biodiversity in the forests.	The commission concludes that the Dutch criterion 7.5 is fully addressed by FSC International through FSC criteria 5.2, 6.6 and 10.11 from FSC-STD-01-001 V5-2 and through indicator 5.2.4 of FSC-STD-60-004 V1-0.	3

Principle 8: The regulating effect and the quality, health and vitality of the forest are maintained and where possible enhanced

Sustainability criterion from the Dutch "regeling conformiteitsbeoordeling vaste biomassa voor energiedoelinden"		ADBE judgement on whether "FSC 100%" biomass complies with the sustainability criteria	Score
8.1	The soil quality of the forest management unit is maintained and if necessary improved, with special attention to coasts, river banks, erosion-sensitive areas and sloping landscapes.	<p>Dutch criterion 8.1 contains two parts:</p> <ol style="list-style-type: none"> <u>The soil quality of the FMU is maintained and if necessary improved ...</u> HCV 4 is on "control of erosion of vulnerable soils and slopes", HCV 4 must be maintained and enhanced based on criteria 9.1-9.4, 10.6 and 10.10 of FSC-STD-01-001 V5-2. This part of the criterion is therefore covered. <u>.. with special attention to coasts, river banks, erosion-sensitive areas and sloping landscapes</u> FSC gives special attention to erosion-sensitive areas and sloping landscapes in criterion 6.7 of FSC-STD-01-001 V5-2 as well as in the definition of HCV4). Coastal areas are not mentioned under FSC. Principle 5, Annex C, point E "Soil conservation" of FSC-STD-60-004 V1-0 covers vulnerable or high risk soils, however, this part is not a requirement through the word "should" and is therefore disregarded by the commission which therefore concludes that this part of the criterion is largely covered. <p>The commission concludes that Dutch criterion 8.1 is largely addressed by FSC International through criteria 6.7, 9.1-9.4 (including HCV 4 on Critical ecosystem services), 10.6 and 10.10 of FSC-STD-01-001 V5-2.</p>	2
8.2	The water balance and quality of both groundwater and surface water in the forest management unit and downstream outside the forest management unit are at least maintained and where necessary improved.	The commission concludes that Dutch criterion 8.2 is fully addressed by FSC International through criterion 6.7 and 9.1-9.4 of FSC-STD-01-001 V5-2.	3
8.3	Important ecological cycles present in the forest management unit are preserved, including carbon and nutrient cycles.	FSC principle 6 and underlying criteria 6.1-6.3 (from FSC-STD-01-001 V5-2) require that the Organization shall maintain, conserve and/or restore ecosystem services and environmental values of the FMU. Carbon cycles are not specifically mentioned but environmental values include soils, carbon sequestration and storage. Ecosystem services include supporting services such as soil formation and nutrient cycling.	3

		As a result the commission concludes that Dutch criterion 8.3 is fully addressed by FSC International.	
8.4	Unnecessary damage to ecosystems is prevented by applying <i>reduced impact logging</i> and the most suitable road construction methods and techniques for local conditions.	The criterion consists of two parts. The first part of reduced impact logging is covered through criteria 10.10 and 10.11 from FSC-STD-01-001 V5-2 and by the FSC definition of Reduced impact harvesting (including logging) which comes close to the definition linked to the Dutch criterion. The second part on road construction is covered by FSC criterion 10.10 from FSC-STD-01-001 V5-2. The commission concludes that Dutch criterion 8.4 is fully addressed by FSC International.	3
8.5	If fires are used to achieve forest management objectives, such as regeneration of specific tree species, then adequate control measures have been taken.	The commission observes that FSC International does not have a specific requirement on taking adequate measures for controlled burning in forests. If controlled burning is applied as a management measure, then criteria 6.2 and 6.3 from FSC-STD-01-001 V5-2 apply: <ul style="list-style-type: none"> - C6.2 mentions that, prior to the start of site-disturbing activities, the Organization shall identify and assess the scale, intensity and risk of potential impacts of management activities - C6.3 stipulates that the Organization shall identify and implement effective actions to prevent negative impacts of management activities. The commission therefore concludes that criterion 8.5 is largely addressed by FSC International.	2
8.6	The forest management measures are designed to prevent and control diseases and pests where these form a threat to natural capital.	The FSC criteria are focused on avoiding chemical pesticides. Criterion 10.7 of FSC-STD-01-001 V5-2 stipulates that the Organization shall use integrated pest management and silvicultural systems which avoid, or aim at eliminating, the use of chemical pesticides. Disease control is not specifically mentioned in the FSC criteria. There is a guiding document to integrated pest, disease and weed management. Relevant aspects are to be included in the national indicators, as also stated in IGI 10.7.1. Disease control is therefore covered through the IGI. The commission concludes that Dutch criterion 8.6 is fully addressed by FSC International through criterion 10.7 of FSC-STD-01-001 V5-2 and indicator 10.7.1 of FSC-STD-60-004 V1-0.	3
8.7	The use of chemicals is only permitted if ecological processes and the optimal deployment of sustainable alternatives prove insufficient. Pesticides classified as Type 1A and 1B by the World Health Organisation and chlorinated hydrocarbons are not permitted.	The Dutch criterion consists of 2 parts. The first part on alternatives for chemical pesticides is covered through criterion 10.7 of FSC-STD-01-001 V5-2. The second part is on Pesticides classified as Type 1A and 1B by WHO and on chlorinated hydrocarbons. Exclusion of chlorinated hydrocarbons is covered under FSC-STD-30-001a EN "FSC List of highly hazardous pesticides". The exclusion of WHO Type 1A and 1B pesticides is covered under FSC-STD-30-001 V1-0 EN Indicators and thresholds for the identification of 'highly hazardous' pesticides (HHP). The use of these pesticides is prohibited in FSC certified forests and plantations unless a temporary derogation for their use has previously been approved for that certificate holder by the FSC Pesticides Committee. Derogations (50 in total at this moment worldwide) shall normally be applicable for a five-year period and can only be renewed under strict conditions. The commission has taken into account that derogations are temporary and apply to a restricted area only (From the list of derogations (FSC-PRO-30-001a): "Derogations are approved for the smallest applicable geographical scope. The derogations listed below are not valid for a national use"). The commission has also taken into account (FSC-PRO-30-001 V1-0, criterion 1.6) that "the unauthorized use of 'highly hazardous' pesticides in an FSC-certified Management Unit shall be considered a major nonconformity". As a result, the commission concludes that the second part of the criterion is largely covered by FSC and that Dutch criterion 8.7 is largely addressed by FSC International.	2
8.8	The accumulation of inorganic waste and litter is prevented or such waste and litter is collected, stored in approved areas and disposed of responsibly.	This requirement consists of two parts of which at least one needs to be complied with. While the commission observes that prevention of waste is not mentioned under FSC, it concludes that Dutch criterion 8.8 is fully addressed by FSC International as the responsible collection, transportation and disposal of waste is covered by criterion 10.12 in FSC-STD-01-001 V5-2 and by indicator 10.12.1 of FSC-STD-60-004 V1-0.	3

Principle 9: The production capacity for wood products and relevant non-timber forest products is maintained in order to safeguard the future of the forests		
Sustainability criterion from the Dutch "regeling conformiteitsbeoordeling vaste biomassa voor energiedoelinden"	ADBE judgement on whether "FSC 100%" biomass complies with the sustainability criteria	Score
9.1 The production capacity of all forest types represented in the forest management unit is maintained.	The commission concludes that Dutch criterion 9.1 is fully addressed by FSC International based on criteria 5.2 and 10.1 of FSC-STD-01-001 V5-2.	3
9.2 The forest management unit is sufficiently protected against all forms of illegal exploitation of timber and non-timber forest products, including hunting and fishing, illegal establishment of settlements, illegal land use, illegally initiated fires and any other illegal activities.	The commission concludes that Dutch criterion 9.2 is fully addressed by FSC International through criteria 1.4 and 6.6 from FSC-STD-01-001 V5-2.	3

Principle 10: Sustainable forest management is achieved through a management system		
Sustainability criterion from the Dutch "regeling conformiteitsbeoordeling vaste biomassa voor energiedoelinden"	ADBE judgement on whether "FSC 100%" biomass complies with the sustainability criteria	Score
10.1 The forest management system is designed to achieve the objectives of a forest management plan and covers the inventory, analysis, planning, implementation, monitoring, evaluation and adjustment cycle.	The commission concludes that Dutch sustainability criterion 10.1 including all sub-requirements on inventory, analysis, planning, implementation, monitoring, evaluation and adjustment cycle are fully addressed by FSC International through criteria 7.1-7.4 and 8.1-8.3 from FSC-STD-01-001 V5-2.	3
10.2 A forest management plan is drawn up that at least includes: - a description of the current condition of the forest management unit; - long term goals for the ecological functions of the forest management unit; - the annual allowable cut per forest type and, if applicable, the annual allowable harvest of non-timber forest products based on reliable and current data; - budget planning for the implementation of the forest management plan.	The commission concludes that Dutch sustainability criterion 10.2 is fully addressed by FSC International through criteria 5.5, 7.2 and 7.3 from FSC-STD-01-001 V5-2 and the indicators under 5.2 in FSC-STD-60-004 V1-0.	3
10.3 Essential elements for the management of the forest are indicated on maps.	The commission concludes that - through the definition of "management plan" in the FSC Glossary of Terms and through various criteria (3.5, 4.7 and 9.1 of FSC-STD-01-001 V5-2 and 1.2 from FSC-STD-60-004 V1-0, essential elements for the management of the forest are indicated on maps and that criterion 10.3 is fully addressed by FSC International.	3

10.4	The implementation of the forest management plan is periodically monitored and the ecological effect of the forest management is evaluated.	This criterion consists of 2 parts. The first part on periodic monitoring is covered through Principle 8 of FSC-STD-01-001 V5-2. The second part on evaluation of the ecological effect is covered by criterion 8.2 of FSC-STD-01-001 V5-2. Therefore, the commission concludes that Dutch criterion 10.4 is fully addressed by FSC International.	3
10.5	The forest management is implemented by professional office and field staff, whose expertise and knowledge is maintained by means of an effective and regular training programme.	The commission concludes that sustainability criterion 10.5 is fully addressed by FSC International on the basis of criterion 2.5 from FSC-STD-01-001 V5-2.	3

Principle 11: Forest management by a group or regional association offers sufficient safeguards for sustainable forest management

Sustainability criterion from the Dutch "regeling conformiteitsbeoordeling vaste biomassa voor energiedoelinden"		ADBE judgement on whether "FSC 100%" biomass complies with the sustainability criteria	Score
11.1	A group or regional association is led and supervised by an independent legal entity.	This criterion requires that a group shall be led and supervised by an independent legal entity. In the group criteria of FSC it is stipulated that the group entity is an independent legal entity, or is an individual acting as a legal entity. Therefore, the commission concludes that Dutch criterion 11.1 is fully addressed by FSC International.	3
11.2	A group or regional association meets the requirements of sustainable forest management (requirements 6.1 through 10.5). The separate forest management activities of the individual members of the group or regional association shall also meet these requirements if applicable for the management of the forest concerned.	This criterion consists of 2 parts. The first part ("a group or regional association meets the SFM requirement) covered by criterion 2.2 of FSC-STD-30-005 (V1-0). The second part of the criterion ("individual group members meet the requirements of SFM") is covered by criterion 3.4 of FSC-STD-30-005 (V1-0). Therefore the commission concludes that Dutch criterion 11.2 is fully addressed by FSC International.	3

Principle 12: A chain of custody system is in place for the biomass, covering the entire chain from the first actor to the energy producer, that links the source to the material used in the product or product group, and provides greenhouse gas emission data of each individual link.

Sustainability criterion from the Dutch "regeling conformiteitsbeoordeling vaste biomassa voor energiedoelinden"		ADBE judgement on whether FSC International complies with the sustainability criteria	Score
12.1	Each link in the chain of custody bears final responsibility and has a quality management system in place that provides safeguards for compliance with the requirements of the chain of custody system.	The commission concludes that Dutch sustainability criterion 12.1 is fully addressed by FSC International through the introduction, criterion 1.1 and chapter 12 of FSC-STD-40-004 V3-0.	3
12.2	Each link in the chain of custody has the relevant greenhouse gas emissions information for its own organisation, which has been obtained using a methodology that is based on the most recent	As FSC does not have requirements on GHG emissions, the commission concludes that Dutch sustainability criterion 12.2 is not addressed by FSC International.	0

	European Commission publication on sustainability criteria for solid biomass and the reference values provided for fossil fuels.		
12.3	Each link in the chain of custody keeps all necessary documentation for demonstrating compliance with the applicable sustainability requirements available for a minimum of 5 years.	The commission concludes that criterion 12.3 is fully addressed by FSC International through part e of criterion 1.1 from FSC-STD-40-004 V3-0.	3
12.4	Each link in the chain of custody registers for all incoming or outgoing consignments the quantities and required sustainability information based on the Dutch regulation "conformity assessment sustainability biomass for energy purposes".	<p>When assessing Dutch criterion 12.4, the advisory commission checks whether 8 types of information are passed on through the CoC. To the understanding of the commission, these 8 types of information are necessary to produce a conformity year statement that allows a Dutch end user to claim subsidy for producing energy from biomass. Further information on the conformity year statement can be found in paragraph 2.6 of the verification protocol and on a website on the SDE+ subsidy.</p> <p>The 8 types of information and the assessment of the ADBE whether FSC International passes this information through the CoC are:</p> <ol style="list-style-type: none"> 1. <u>Biomass category or information allowing to unambiguously determine the biomass category.</u> FSC International does not provide information on the biomass category, also the size of the FMU is not passed on through the CoC and hence no distinction can be made between category 1 and category 2 biomass. 2. <u>For category 2 biomass: has the sustainability been demonstrated at regional or at forest management level.</u> As FSC did not apply for approval for the risk based approach and sustainability is demonstrated for both category 1 and 2 biomass on FMU level, this information is not relevant for FSC. This requirement is covered by FSC. 3. <u>For category 1 and 2 biomass: is the biomass controlled biomass (only required if the scheme has requested approval for criterion 12.6).</u> 'Controlled wood' is an FSC claim. The FSC claim is recorded and thereby the information is transferred to the next organization in the chain on sales documents. The claim is then "FSC Controlled Wood". This requirement is covered by FSC. 4. <u>Country of origin of the feedstock</u> Upon request, the Organization shall provide information on species (common and scientific name) and country of harvest to comply with timber legislation. This information can be shared, however, only upon request. This requirement is covered by FSC. 5. <u>The kind of GHG emission value that is being used: (a) a total default value, (b) an actual value(s), of (c) a combination of disaggregated default values and actual values.</u> FSC does not cover other sustainability aspects such as greenhouse gas emission data. This requirement is not covered by FSC. 6. <u>In case actual values are being used: the GHG emission in g CO₂ equivalent per MJ or ton biomass produced.</u> FSC does not cover other sustainability aspects such as greenhouse gas emission data. This requirement is not covered by FSC. 7. <u>The certification scheme (plus any additional verification statement(s)) which are used to demonstrate compliance with the sustainability criteria under principles P2-P11.</u> The organization shall ensure that sales documents issued for products sold with FSC claims include a.o. (i) the organization's FSC certificate code associated to FSC-certified products and/ or FSC Controlled Wood code associated to FSC Controlled Wood products and (ii) a clear indication of the FSC claim for each product item or the total products. The sustainability characteristics of FSC certified products concern sustainable forest management and are ensuring other responsible sources as well (reclaimed and FSC Controlled Wood). However: at the end of a CoC with one or a few links between the forest owner and the end user of the biomass it will no longer be known which FSC country scheme (NFFS) was used to demonstrate compliance with the SFM criteria. As the commission concludes that all FSC NFFS's approved for P&C V5 demonstrate compliance with the 	1

		<p>same Dutch criteria as the FSC metascheme does, this requirement is covered by FSC.</p> <p>8. <u>The certification scheme (plus any additional verification statement(s)) which are used to demonstrate compliance with the CoC criteria under principles P12-P13</u> The organization shall ensure that sales documents issued for products sold with FSC claims include the organization's FSC certificate code associated to FSC-certified products and/ or FSC Controlled Wood code associated to FSC Controlled Wood products. This requirement is covered by FSC.</p> <p>The commission concludes that Dutch criterion 12.4 is partly addressed by FSC International.</p>	
12.5	<p>Each link in the chain of custody applies a mass balance in case of mixing or splitting of materials with different sustainability characteristics. For the mixing the following applies:</p> <ul style="list-style-type: none"> - The method shall be applied at least at the level of a location; - The organisation defines a period with a maximum of a year, during which incoming and outgoing consignments are measured and reports the results; - All sustainability characteristics of mixed biomass output can be traced back to the characteristics and quantities of the incoming consignments, taking account of the applicable conversion factors. 	<p>FSC uses two different CoC control systems for mixing of consignments with different sustainability characteristics: the percentage system and the credit system. A third CoC control system, the transfer system (physical segregation), meets the requirements of Dutch criterion 12.5 as these requirements are on mixing or splitting of materials with different sustainability characteristics, which does not happen in case of the transfer method. Within FSC, information on which CoC control system is used, is not passed through the value chain. Dutch criterion 12.5 contains three different requirements for CoC control systems in case of mixing or splitting of consignments with different sustainability characteristics:</p> <ol style="list-style-type: none"> 1. <u>The method shall be applied at least at the level of a location</u> Under the Dutch requirements, mass balances must be site-specific; they shall at least be operated at the level of a geographical location. In the case of the FSC percentage system and FSC credit system, there can, however, be multiple physical (geographical) sites. As a result, the FSC percentage system and the FSC credit system do not cover this requirement. 2. <u>The organisation defines a period with a maximum of a year, during which incoming and outgoing consignments are measured and reports the results</u> For both the percentage system and the credit system, the (obligatory) annual audits by conformity assessment bodies ensure that incoming and outgoing consignments are measured and reported on a yearly basis. Therefore, both systems meet this requirement. 3. <u>The sustainability characteristics of mixed biomass output can be traced back to the characteristics and quantities</u> FSC criterion 4.1 from FSC-STD-40-004 V3-0 stipulates for all CoC systems that for each product group or job order, the organization shall identify the main processing steps involving a change of material volume or weight and specify the conversion factor(s) for each processing step. The sustainability characteristics of FSC certified products concern to sustainable forest management and ensuring other responsible sources as well (reclaimed and FSC Controlled Wood). This requirement is covered by the FSC percentage system and the FSC credit system. <p>As a result, the commission concludes that on the basis of FSC-STD-40-004 V3-0 FSC International partly addresses Dutch sustainability criterion 12.5. The FSC percentage system and the FSC credit system do not comply with the requirement that the method shall be applied at least at the level of a location.</p>	1
12.6	<p>When being mixed with other consignments category 1 and 2 consignments only complying with the requirements 1.1, 3.1, 3.2, 3.3, 4.1, 4.2, 4.3, 5, 7.1 and 7.3 are distinguished as controlled biomass on a mass balance. For controlled biomass, the biomass producer is the first link in the chain of custody and the source is the forest management unit or a defined supply area.</p>	<p>Dutch sustainability criterion 12.6 includes a definition for controlled biomass: category 1 and 2 consignments complying with the requirements 1.1, 3.1, 3.2, 3.3, 4.1, 4.2, 4.3, 5, 7.1 and 7.3. Elsewhere (see paragraph 4.4) it is assessed whether or not the claim "FSC Controlled Wood" demonstrates compliance to these requirements.</p> <p>Dutch sustainability criterion 12.6 includes three requirements:</p> <ol style="list-style-type: none"> 1. <u>When being mixed with other consignments, consignments are distinguished as controlled biomass on a mass balance.</u> FSC Int. makes a clear distinction between "FSC 100%" (plus the x% "FSC 100%" in FSC Mix x%") and "FSC Controlled Wood". As a result, the commission concludes that FSC Int. covers the first part of criterion 12.6. 2. <u>For controlled biomass, the biomass producer is the first link in the chain of custody.</u> The FSC conformity assessment for controlled wood starts at the FMU in which case certification is based on "FSC-STD-30-010 V2-0 Controlled Wood standard for FM enterprises". In case certification is performed by an organisation that not owns or manages the supply unit, certification must be based on "FSC-STD-40-005 V3-1 	3

		<p>Requirements for sourcing FSC® controlled wood". According to this standard the organisation is a biomass producer that (condition 1.2) "shall include all suppliers and sub-suppliers of the material assessed according to this standard in its Due Diligence System". The commission therefore concludes that this part of the criterion is covered by FSC International.</p> <p>3. <u>For controlled biomass, the source is the forest management unit or a defined supply area.</u> When biomass is sourced from a forest manager, the source is an FMU. In case controlled wood is sourced by an organisation that does not own or manage the supply unit, then certification is based on FSC-STD-40-005 V3-1 – Requirements for sourcing FSC® controlled wood) which requires (condition 2.2) that "the organization shall maintain evidence of the origin of material that allows..". The commission concludes that maintaining evidence of the origin causes a supply area to be defined, and hence concludes that this part of the criterion is covered by FSC Int.</p> <p>The commission concludes that FSC International fully addresses Dutch sustainability criterion 12.6.</p>	
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Principle 13: In case of a group management system for the chain of custody the same requirements apply to the group as a whole as to individual businesses

Sustainability criterion from the Dutch "regeling conformiteitsbeoordeling vaste biomassa voor energiedoelinden"	ADBE judgement on whether FSC International complies with the sustainability criteria	Score
13.1 A group is led by a legal entity that is responsible for the group as a whole. This entity uses a management system as well as technical and human resources that enable it to supervise the participating locations within the scope of the system. The entity conducts an annual audit of a sample of the affiliated group members.	FSC International requires a group to be led by a Central Office which can be an "office, department, person", or can be a Participating Site. FSC does not require that a group is led by a legal entity. The commission is of opinion that the Central Office will in practice be (part of) a legal entity. This Office should demonstrate its capacity to manage continuously and effectively the number of Participating Sites under the scope of the certificate. The commission concludes that Dutch criterion 13.1 is fully addressed by FSC International based on criteria 4.1, 4.2, 4.3 and 5.3 from FSC-STD-40-003 (V2-1).	3
13.2 The group applies to the requirements 12.1 up to and including 12.6. Furthermore, each group member individually meets these requirements insofar as applicable to their own activities.	The commission concludes – based on criterion 4.2 from FSC-STD-40-003 (V2-1) – that Dutch sustainability criterion 13.2 is fully addressed by FSC International.	3
13.3 The group leader uses a registration system to record: <ul style="list-style-type: none"> - the names and addresses of the members; - a declaration submitted by each member in which they declare that they meet chain of custody system requirements; - incoming and outgoing consignments of each individual group member. 	Based on criteria 5.1.4 and 5.3.7 of FSC-STD-40-003 V 2-1, the commission concludes that Dutch criterion 13.3 is fully addressed by FSC International.	3

4.4 Assessment tables on sustainability criteria for the claim “FSC controlled wood”

The minister of EZK will approve certification schemes per claim from the certification scheme and per individual sustainability criterion from the Dutch regulation.

FSC International did not request approval for sustainability criteria under principles P1 and P5, and hence the commission has not assessed whether the claim “FSC controlled wood” demonstrates compliance with the sustainability criteria 1.1 and 5.1 from the Dutch regulation.

The commission refers to paragraph 4.3 for the details results on sustainability criteria 12.1, 12.2, 12.3, 12.4, 12.5 and 12.6, as FSC International CoC requirements apply to all FSC claims.

FSC International has two documents for certifying controlled wood: When controlled wood is supplied by a forest manager, the source is an FMU and certification is based on document FSC-STD-30-010 “Controlled Wood standard for FM enterprises”. In case controlled wood is sourced by an organisation that does not own or manage the supply unit, then certification is based on FSC-STD-40-005 “Requirements for sourcing FSC® controlled wood”. Both documents are used worldwide to certify against.

A Dutch requirement (see sustainability criterion 12.6) is that the conformity assessment for controlled biomass starts at least at the biomass producer (the pellet mill). For FSC controlled wood, FSC certification either starts at the forest management unit (FSC-STD-30-010) or at the pellet mill (FSC-STD-40-005 V3-1). This condition is therefore met by FSC controlled wood.

As FSC controlled wood does not need to comply with the FSC SFM requirements in FSC-STD-01-001 V5-2 and FSC-STD-60-004 V1-0, but instead needs to comply with FSC-STD-40-005 V3-1 “FSC Requirements for Sourcing FSC Controlled Wood” and FSC-STD-30-010 V2-0 “FSC Controlled Wood Standard for Forest Management Enterprises”, the commission has assessed whether compliance to these two FSC standards causes controlled wood to comply with Dutch sustainability criteria 3.1, 3.2, 3.3, 4.1, 4.2, 4.3, 7.1 and 7.3. Results are listed below.

Principle 3: Production of raw biomass does not result in the destruction of carbon sinks		
Sustainability criterion from the Dutch “regeling conformiteitsbeoordeling vaste biomassa voor energiedoeleinden”	ADBE judgement on whether “FSC controlled wood” complies with the sustainability criteria	Score
3.1 Biomass is not sourced from permanently drained land that was classified as peat land on 1 January 2008, unless it can be demonstrated that the production and harvesting of the biomass does not result in water depletion of a previously undrained soil.	FSC document FSC-STD-30-010 does not include a requirement that biomass shall not be sourced from drained peatland. Also FSC document FSC-STD-40-005 does not include a requirement that addresses Dutch sustainability criterion 3.1. As a result the commission concludes that the claim “FSC controlled wood” does not address Dutch sustainability criterion 3.1.	0
3.2 Biomass is not sourced from land that was converted from wetland to an alternative, dryer ecosystem after 1 January 2008.	FSC document FSC-STD-30-010 does not include a requirement that biomass shall not be sourced from converted wetlands. Also FSC document FSC-STD-40-005 does not include a requirement that addresses Dutch sustainability criterion 3.2. As a result the commission concludes that the claim “FSC controlled wood” does not address Dutch sustainability criterion 3.2.	0
3.3 Biomass is not sourced from wood plantations that	Forest conversion is defined by FSC as the ‘removal of natural forest by human activity, without subsequent	0

<p>were created by means of conversion of natural forests after 31 December 1997, unless the forest manager is not directly or indirectly responsible for the conversion. Biomass originating from wood plantations that were created after 1997 by means of conversion of degraded natural forests or degraded land is exempt from this requirement on condition that it is ecologically and economically justified to do so and that the forest manager is not directly or indirectly responsible for the degradation.</p>	<p>regeneration'. An unacceptable source for FSC Controlled wood is wood harvested from areas being converted from forests and other wooded ecosystems to plantations or non-forest uses. No historical benchmark year is given. No exceptions are mentioned. The assessment takes place on supply area level and the risk is considered low when there is no net loss or no significant rate of loss (> 0.5% per year) of natural forests and other naturally wooded ecosystems taking place in the eco-region. As FSC does not include a historical benchmark year, the commission concludes that Dutch criterion 3.3 is not covered by FSC-STD-30-010 or FSC-STD-40-005. As a result the commission concludes that the claim "FSC controlled wood" insufficiently addresses Dutch sustainability criterion 3.3.</p>	
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Principle 4: The use of biomass does not result in a long-term carbon debt

Sustainability criterion from the Dutch "regeling conformiteitsbeoordeling vaste biomassa voor energiedoeleinden"		ADBE judgement on whether "FSC controlled wood" complies with the sustainability criteria	Score
4.1	The forest management unit where the wood is sourced is managed with the aim of retaining or increasing carbon stocks in the medium or long term.	The FSC documents FSC-STD-30-010 and FSC-STD-40-005 do not include a requirement on carbon stocks and hence the commission concludes that the claim "FSC controlled wood" does not address Dutch sustainability criterion 4.1.	0
4.2	Biomass is not sourced from stumps unless these stumps had to be removed from the site for other reasons than wood or biomass production.	The FSC documents FSC-STD-30-010 and FSC-STD-40-005 do not include a requirement on stumps and hence the commission concludes that the claim "FSC controlled wood" does not address Dutch sustainability criterion 4.2.	0
4.3	On average less than half the volume of the annual round wood harvest from forests is processed as biomass for energy generation. Round wood from thinnings or from production forests with a rotation period of 40 years or less is exempt from this requirement.	The FSC documents FSC-STD-30-010 and FSC-STD-40-005 do not include a requirement on a maximum share of round wood to be processed as biomass for energy generation. Hence the commission concludes that the claim "FSC controlled wood" does not address Dutch sustainability criterion 4.3.	0

Principle 7: Biodiversity is maintained and where possible enhanced

Sustainability criterion from the Dutch "regeling conformiteitsbeoordeling vaste biomassa voor energiedoeleinden"		ADBE judgement on whether "FSC controlled wood" complies with the sustainability criteria	Score
7.1	Sites with a high conservation value and representative areas of the forest types that are found in the forest management unit have been identified and are protected and where possible enhanced. The sites may contain one or more of	To comply with the requirements for controlled wood in FSC-STD-30-010 V2-0, forest management activities in the FMU shall not threaten high conservation values. FSC-STD-30-010 V2-0 criteria 5.1 and 5.2 stipulate that the Forest Management Enterprise shall keep records of evidence to demonstrate compliance. Also, all harvesting shall take place in compliance with all laws applicable to harvesting in the jurisdiction including evidence that timber is harvested from authorized areas (e.g. not from protected areas where harvest is not allowed) and including evidence	2

	<p>the following values: diversity of species, ecosystems and habitats, ecosystem services, ecosystems at landscape level and cultural values.</p>	<p>of compliance with applicable provisions and requirements of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). Therefore the commission concludes that FSC-STD-30-010 V2-0, which is directed towards forest managers, covers Dutch criterion 7.1.</p> <p>FSC-STD-40-005 risk assessment indicator 3.1 requires that organizations that acquire wood shall assess whether any HCVs are threatened at the eco-regional level and how forest management activities relate to these HCVs at the supply area level (not on the supply FMU level). Indicator 3.2 requires that a strong system of protection is in place that ensures survival of the HCVs in the eco-region.</p> <p>Thus, FSC-STD-40-005 requires that HCV forests are identified at eco-regional level and are sufficiently protected. If there is such a system or such protection, then the risk that criterion 7.1 is not met at the FMU level is low. FSC does not mention the possibility for enhancement of these areas for sourcing of controlled wood, and hence the commission concludes that this requirement is largely covered by FSC-STD-40-005.</p> <p>As a result the commission concludes that Dutch sustainability criterion 7.1 is largely addressed by the FSC International claim "FSC controlled wood".</p>	
7.3	<p>The conversion of forests within the forest management unit to other forms of land use, including wood plantations, is not permitted unless:</p> <ul style="list-style-type: none"> - the area concerned is small which means the total converted area over the years is no greater than 5% of the area of the forest management unit on benchmark date 1 January 2008; and - it clearly leads to long-term advantages for nature conservation; and - there is no damage or threat of damage to sites with a high conservation value. 	<p>FSC-STD-30-010 V2-0 stipulates that "no conversion of natural and semi-natural forests and other wooded ecosystems such as woodlands and savannahs to plantations or non-forest uses take place (C6.1), except in circumstances where conversion (C6.3):</p> <ol style="list-style-type: none"> a) entails a very limited portion of the FMU b) does not occur on high conservation value forest areas, c) will enable clear, substantial, additional, secure long term environmental and social benefits across the FMU <p>One of the five categories of unacceptable material that cannot be mixed with FSC certified controlled wood, is wood harvested in forests being converted to plantations or non-forest use. Thus, FSC Controlled biomass prohibits conversion of forests, and Dutch criterion 7.3 is covered by FSC document FSC-STD-30-010.</p> <p>In the FSC controlled wood document FSC-STD-40-005, the FSC assessment takes place on supply area level and the risk is considered low when there is no net loss or no significant rate of loss (> 0.5% per year) of natural forests and other naturally wooded ecosystems taking place in the eco-region. No reference year is provided but there should be no damage to HCV areas (see category 3 Controlled wood). Depending on the size of the eco-region, it is possible that the 0.5% per year loss of natural forests in the area takes place in few FMUs so that 5% of the area of that specific FMU is converted. As the risk is low, the commission concludes that this part of the criterion is largely covered by FSC controlled wood supplied by companies that are certified against FSC-STD-40-005.</p> <p>As a result, the commission concludes that FSC International through the claim "FSC controlled wood" largely addresses Dutch sustainability criterion 7.3.</p>	2

The commission has observed that material which arrives with an "FSC controlled claim" can contain recycled/reclaimed material:

- Eligible inputs for an "FCM Mix x%" claim are materials with an FSC Recycled claim or pre-consumer reclaimed / post-consumer reclaimed materials (Table B on page 10 of FSC-STD-40-004 V3-0).
- "The organization may opt to downgrade an FSC output as presented in Figure A" (5.9 op page 13 of FSC-STD-40-004 V3-0). The figure illustrates that material with an "FSC Mix x%" claim may be downgraded to the claim "FSC Controlled Wood".

Controlled wood containing recycled/reclaimed material and that is delivered to The Netherlands would not meet the definition of controlled biomass from the Dutch regulation, as controlled biomass consists of "category 1 and 2 consignments only complying with the requirements 1.1, 3.1, 3.2, 3.3, 4.1, 4.2, 4.3, 5, 7.1 and 7.3" whereas recycled/reclaimed material is category 5.

The commission notes that for biomass delivery to The Netherlands (and that will have to meet the Dutch sustainability criteria for solid biomass) different categories of biomass will not administratively be mixed, as GHG calculations will have to be made for every batch of biofuel and as different categories will result in different batches. A pellet mill owner receiving controlled wood (of category 1 or 2) as well as reclaimed/recycled material will keep these streams administratively separated to be able to make a GHG calculation or to be able to deliver GHG data which allow to make a GHG calculation later. Moreover, as FSC did not apply for approval of category 5 biomass, the pellet mill owner will probably deliver the reclaimed/recycled material with a claim from another certification system (such as Better Biomass or SBP) that is approved for category 5 biomass. The commission considers it to be likely that pellet mills will be certified against two (or more) certification schemes as (for instance) FSC does not meet all CoC criteria from the Dutch regulation.

As a result, the commission concludes that the risk is low that recycled or reclaimed material will be delivered to the Netherlands as FSC Controlled Wood for energy production with SDE+ subsidy. Therefore the observation as described above does not change the commissions' assessment on FSC Controlled Wood.

5 Documents used for the assessment of certification scheme FSC International

5.1 Documents submitted by the scheme manager as part of the request for approval

1. [FSC-POL-01-004 \(V2-0\)](#) Policy for the association of organizations with FSC
2. [FSC-POL-30-001 \(2005\)](#) FSC Pesticides Policy
3. [FSC-PRO-01-001 \(V3-1\)](#) The development and revision of FSC normative documents
4. [FSC-PRO-01-005 \(V3-0\)](#) Processing appeals
5. [FSC-PRO-01-008 \(V2-0\)](#) Processing complaints in FSC certification scheme
6. [FSC-PRO-01-009 \(V3-0\)](#) Processing policy for association complaints in the FSC® certification scheme
7. [FSC-STD-01-001 \(V5-2\)](#) FSC Principles and Criteria for Forest Stewardship
8. [FSC-STD-01-002 \(2017\)](#) FSC Glossary of terms
9. [FSC-STD-20-001 \(V4-0\)](#) General requirements for FSC accredited certification bodies
10. [FSC-STD-30-001 \(V1-0\)](#) Indicators and thresholds for the identification of 'highly hazardous' pesticides (HHP)
11. [FSC-STD-30-001A \(2017\)](#) FSC List of 'Highly hazardous' pesticides
12. [FSC-STD-30-005 \(V1-0\)](#) FSC Standard for Group Entities in Forest Management Groups
13. [FSC-STD-30-010 \(V2-0\)](#) FSC Controlled Wood Standard for Forest Management Enterprises
14. [FSC-STD-40-003 \(V2-1\)](#) Chain of custody certification of multiple sites
15. [FSC-STD-40-004 \(V3-0\)](#) Chain of Custody Certification
16. [FSC-STD-40-005 \(V3-1\)](#) FSC Requirements for Sourcing FSC Controlled Wood
17. [FSC-STD-60-004 \(V1-0\)](#) International Generic Indicators
18. [FSC-STD-60-006 \(V1-2\)](#) The development and revision of National Forest Stewardship Standards

5.2 Documents submitted by the scheme manager to the ADBE as a result of questions during the assessment

19. FSC-DIR-20-007 EN FSC Directive on FSC FM Evaluations
20. FSC-PRO-30-001 V1-0 EN Pesticide Derogation Procedure
21. FSC-PRO-30-001a EN List of approved derogations for use of HHP
22. FSC-PRO-60-007 V1-0 EN Structure, Content and Development of INS's
23. FSC-STD-01-2010 USA Natural and Plantations
24. FSC-STD-FRA-01-2016_France-All forest types and scale
25. FSC-STD-ITA-01-2017 V 1-0
26. [FSC Dispute Resolution process](#)

5.3 Additional documents assessed by the commission

27. FSC-REP-01-001-EN NFSS_ Annual Report_Updated_2016
28. FSC-STD-01-001 (V5-0) FSC Principles and Criteria for Forest Stewardship
29. FSC-STD-BGR-01-2016 Bulgarian Natural and Plantations Forest and SLIMF_amended_EN
30. FSC-STD-CA-01-XXXX (D3-0) EN National Forest Stewardship Standard Canada (Draft, April 2018)
31. FSC-STD-CAN-01-2018 EN National Forest Stewardship Standard Canada (Final draft, Sept. 2018)
32. FSC-STD-PRT-01 2016 EN - The FSC National Forest Stewardship Standard of the Portuguese Republic.

5.4 Additional document provided by stakeholders as part of their external input

33. Clark M.R. and Kozar, J.S. 2011. [Comparing Sustainable Forest Management Certification Standards: A Meta-analysis](#). Ecology and Society.

Annex A – Assessment of a sample of FSC National Forest Stewardship Standards

A1 Introduction

A1.1 Background

FSC International is a meta scheme which serves to develop and approve country- or region-specific certification schemes like FSC Netherlands, FSC Russian Federation and FSC United States of America. The results of the ADBE’s assessment of FSC International is given in the full report. This annex gives the results of an assessment by the ADBE of a sample of approved National Forest Stewardship Standards (NFSSs) including relevant national scheme documents other than the standard document.

A1.2 Point of attention for the approval process for meta schemes

The ADBE has observed that there may be a specific point of attention with respect to the approval of meta schemes. This point of attention is the result of the way in which certification schemes will be approved for complying with Dutch sustainability criteria for solid biomass for energy applications. The Dutch minister will approve schemes per sustainability criterion, which means that (as an example) approval can be given for criteria 1-4 whereas criterion 5 is not approved. The point of attention is the possibility that in practice (i) a meta scheme will be approved for a certain number of criteria and (ii) a national standard which is approved by this meta scheme might not meet (part of) the same criteria. For instance an approved national standard could only meet criteria 1-3 and 5, as is illustrated in the table below. This would result in non-compliance by the national standard for criterion 4 which on the other hand is complied with by the meta standard (which is part of the meta scheme). If in this case FSC Int. would be approved by the Dutch Minister including all FSC approved NFSSs, then the specific FSC approved national standard shown in the right column in the figure below could also be used for demonstrating compliance with criterion 4.

Dutch sustainability criterion	FSC meta standard	FSC approved national standard
1	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
3	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
4	<input checked="" type="checkbox"/>	
5		<input checked="" type="checkbox"/>

To assess the congruency between the international meta scheme and NFFSs, the ADBE decided to conduct an assessment of a sample of three NFSSs and compare their scores with the FSC Int. scores.

A2 Procedures

A2.1 Assessment procedure

The advisory commission followed the extended version of its assessment procedure for meta schemes as explained in chapter 2 of the main report. This annex is the result of the steps “Assessment sample of country schemes” and “Preliminary judgement country schemes”.

A2.2 Selection of NFSSs to be included in the sample

The commission selected NFSSs to be included in the sample on the basis of the following three criteria: (1) the NFSS must be approved for the latest version (P&C V5) of the FSC Int. meta scheme² (2) preferably all NFSSs selected concern countries from which Dutch end users (expect to) source biomass, and (3) the geographical range is as wide as possible (preferably different continents).

The commission decided on the size of the sample, according to the following reasoning. The commission estimated the number of countries which currently supply, and in the near future are expected to supply, biomass to Dutch end users at 8³. The size of the sample was determined to be the square root of 8, rounded to above, which is 3.

The commission found that currently only two NFSSs of the eight countries are (almost) approved against P&C V5 of FSC International: Portugal (approved for P&C V5) and Canada (about to be approved for P&C V5). It decided therefore to also include Bulgaria (approved for P&C V5) as this gives a wider geographical range.

The commission decided to include Canada in the sample (despite the fact that the NFSS for Canada was not yet approved) as (a) the FSC Canada document was ready for approval when the commission made its assessment in June 2018 and (b) the commission wanted to focus on countries that source biomass to The Netherlands. The commission assessed the draft of the Canadian NFSS (document FSC-STD-CA-01-XXXX (D3-0) EN. After the conditional approval of FSC Canada in October 2018, the commission checked whether the final version of the FSC Canada standard (document FSC-STD-CAN-01-2018 EN) would lead to another conclusion as compared to the draft Canadian standards, and concluded that both documents lead to the same conclusion.

The commission decided to only assess NFSSs, but no interim national standards (INSSs). The commission did so as most of the mentioned eight countries have developed or are developing NFSSs, although some based on a previous version (P&C V4). The commission has decided not to assess INSSs as countries which have developed or are developing INSSs based on P&C V5 are unlikely to supply biomass for energy to The Netherlands. The commission understands that Estonia, Latvia and Lithuania (that all have INSSs based on P&C V4) are developing NFSSs based on P&C V5. The commission has also not assessed ‘regional’ forestry stewardship standards (RFSSs). The commission notes that this does not make a difference as the FSC requirements for NFSSs and RFSSs are the same.

The commission also looked into the differences between the versions 5-0, 5-1 and 5-2 of the FSC Int. standard (see also Section C “Note on Version 5-0, Version 5-1 and Version 5-2” in FSC-STD-01-001 V5-2 EN). The commission concluded that the differences between these three versions are small and that assessment of each of these three schemes against the Dutch criteria leads to the same outcome.

² Version 5-2 of the FSC Principles & Criteria was submitted for approval for the Dutch sustainability criteria.

³ Canada, U.S., Portugal, Estonia, Latvia, Lithuania, Ukraine and Russia

A2.3 Assessment of NFSSs

The NFSSs from Bulgaria, Canada and Portugal were assessed in the same way as other certification schemes, the only difference was that the commission made a selection of sustainability and management criteria to be included in this assessment, in the following way:

- Included were the sustainability criteria for which FSC Int. was scored “largely addressed” or “fully addressed”, which are the criteria 3.3, 4.1, 6.1 – 6.3, 7.1 – 7.5, 8.1 – 8.8, 9.1 – 9.2, 10.1 – 10.5 and 11.1 – 11.2.
- The sustainability criteria 12.1 – 12.6 and 13.1 – 13.3 are not included in this assessment of NFSS’s as the FSC CoC document FSC-STD-40-004 V3-0 EN “Chain of Custody Certification” applies worldwide and is (in contrary to the documents FSC-STD-01-001 V5-2 EN FSC “Principles and Criteria for Forest Stewardship” and “FSC-STD-60-004 V1-0 EN International Generic Indicators”) used for actual certification. Standard Development Groups have no freedom adapting, modifying or dropping indicators for the CoC criteria when developing an NFSS; also in their country FSC-STD-40-004 V3-0 must be used for CoC certification. As a result, NFSSs meet the CoC criteria in the same way as does FSC International.
- Included are the management criteria 2 - 8. Management criterion 1 was not included because when the meta scheme demonstrates that there is a widely supported need for the scheme, this holds automatically for the approved national schemes (as they represent the application of the meta scheme at the national or regional level).

A3 General results of the assessment of the NFSS sample

During the assessment, the commission came to a number of general results that are presented in this chapter A3.

A3.1 Criteria are almost identical in FSC Int. and NFSSs

Requirement 3.1 of FSC-STD-60-002 (V1-0) reads “The standard shall include the wording of each FSC Principle and each FSC Criterion, in the same order as they occur in the current version of FSC-STD-01-001 FSC Principles and Criteria of Forest Stewardship”. The commission checked whether all criteria in the NFSSs from Bulgaria, Canada and Portugal are included in the same wording and in the same order as in FSC-STD-01-001 V5-2 EN, and concludes that this is almost completely done (with the exception of criteria that are not applicable, see paragraph A5.1 under criterion 7.1, and with the exception of one small modification for FSC Portugal as is explained in paragraph A5.3 under criterion 10.1).

The consequence of FSC requiring to implement criteria word-by-word is that the differences between NFSSs and the FSC Int. criteria and indicators can only occur at indicator level. Such differences at indicator level are allowed and stimulated as to adapt the FSC meta standard to local conditions. Chapters A5 presents some of the differences at the indicator level that were found by the commission.

A3.2 FSC Int. takes responsibility with regard to NFSS scheme management

During the assessment the commission concluded that some of the management criteria for the NFSSs are complied with through FSC Int. In other words, FSC int. takes responsibility for ensuring that management requirements are implemented. As the implementation for most of the Dutch management criteria is similar for the three NFSSs that were assessed, the results of the assessment on management criteria are summarised together in chapter A4.

A4 Results of the assessment of the management criteria

In the table below, the commission gives the results of the assessment of FSC Bulgaria, FSC Canada and FSC Portugal against management criteria 2 –8 from the Dutch “regeling conformiteitsbeoordeling vaste biomassa voor energiedoeleinden”.

Management criterion from the Dutch “regulation		ADBE judgement on whether FSC Bulgaria, FSC Canada and FSC Portugal comply with the management criteria
2	The development of the scheme is transparent and participation in the process of development of the scheme is open to anyone.	<p>The FSC Int. document FSC-STD-60-006 V1-2 EN “Development National Forest Stewardship Standards” sets process requirements for developing national and regional forest stewardship standards, which include:</p> <ul style="list-style-type: none"> • A Consultative Forum to ensure that all stakeholders who may be affected by the implementation of the standard have the opportunity to comment formally during the standard development process; • Consultation of the first and the ‘forest-tested’ draft to stakeholders; • Preparation of a ‘pre-approval’ draft, which takes account of stakeholder comments on the forest-tested draft; • Details on how draft standards are to be submitted for decision making; and • A section 12 on review and revision of a Forest Stewardship Standard. <p>The commission has checked whether during development of the three NFSSs from the sample the development of the scheme has been transparent and participation in the process of development has been open to anyone. The commission concludes (from section 2.3 in the Bulgarian NFSS, section 1.3 of the Portuguese NFSS and the “Preamble - Development of the FSC Canada Standard” plus Annex A (listing all stakeholder engagement events) in the Canadian NFSS plus this webpage of FSC Canada) that the three NFSSs fully address Dutch management criterion 2.</p>
3	The methods related to the development of the scheme are documented and at least include the organisations participating in the development of the scheme and the decision-making process for the development of the scheme.	<p>The FSC Int. document FSC-STD-60-006 V1-2 EN “Development National Forest Stewardship Standards” sets process requirements for developing national and regional forest stewardship standards, which include details on how draft standards are to be submitted for decision making. Sections 2.3 in the Bulgarian NFSS, section 1.3 of the Portuguese NFSS and the “Preamble - Development of the FSC Canada Standard” in the Canadian NFSS contain information on how drafts were prepared for decision making by FSC International. The decision-making process of FSC International is documented in FSC Int. document FSC-STD-60-006 V1-2 EN sections 10.5 – 11.3.</p> <p>The Standard Development Groups of the three NFSSs document the organisations participating in the development of the scheme as follows:</p> <ul style="list-style-type: none"> • In the Bulgarian NFSS, the participating organisations are listed in section 1.2 of the standard document. • In the Canadian NFSS, Annex A lists the persons (plus their organisations) who contributed to the development of the standard as part of the FSC Canada Board of Directors, the Standard Development Group, the Technical Expert Panels and Standard Testing. • Development of the Portuguese NFSS was initiated by FSC Portugal and was later continued by the sustainable forest management standards technical committee (TC 145). Input was received from the Grupo de Partes Interessadas (Group of Stakeholders). The persons and organisations involved are not publicly listed but are internally documented as (1) any person or organization can participate, and (2) they first need to register with FSC Portugal. The commission received on request details on the persons and organisations in the Portuguese Standard Development Group. <p>As a result, the commission concludes that Dutch management criterion 3 is fully addressed by the three NFSS’s as part of this assessment.</p>

4	<p>It can be demonstrated that during the development of the scheme and as part of the scheme management expertise of the sustainability requirements covered by the scheme is applied.</p>	<p>FSC Int. requires (FSC-STD-60-006 V1-2 EN 3.2.a) that those responsible for implementing the process shall cover the following: a) expert knowledge and/or experience of forest management in the geographic scope of the Forest Stewardship Standard;</p> <p>The Standard Development Groups of the three NFSSs have applied expertise during the development of the scheme as follows:</p> <ul style="list-style-type: none"> • Bulgaria: The National Standard Development Group (NSDG) that developed the Bulgarian FSC standard contained experts from environmental, economic and social chambers. • Portugal: Environmental, social and economic experts participated in the Portuguese NSDG (as was learned by input from FSC Portugal on the composition of the NSDG). • Canada. The NSDG contained experts from environmental, economic and social chambers, whereas the Technical Expert Panels contained Experts on several relevant topics. <p>Moreover, at national level expertise was applied when performing the field tests of the draft standard.</p> <p>The commission notes that management of the NFSSs is a responsibility of both FSC International and the local FSC office or the local Standard Development Group when a revision of a scheme is prepared. In the main report (in paragraph 4.2) the commission concludes that FSC International complies with management criterion 4.</p> <p>The commission therefore concludes that all three NFSSs from the sample fully address Dutch management criterion 4.</p>
5	<p>The scheme is publicly available or accessible under fair, reasonable and non-discriminatory conditions.</p>	<p>All NFSSs can be downloaded free of charge from the FSC document centre which is publically available at https://ic.fsc.org/en/document-center. As a result, the commission concludes that all FSC approved NFSS's fully address Dutch management criterion 5.</p> <p>The commission has scored "not applicable" for FSC Canada as the commission has decided to assess a final draft of the Canadian NFSS which was not yet approved and hence not yet published.</p> <p>The commission has observed that not all countries for which NFSSs were developed have a website on which the scheme documents can also be found in national language (an example is Bulgaria). This does not lead to another conclusion as this is not a requirement following from the Dutch criteria.</p>
6	<p>The scheme manager limits the use of the scheme to the conformity assessment bodies he has entered into an agreement with, unless the scheme owner itself is the only conformity assessment body.</p>	<p>FSC International has indicated – in response to questions by the commission – that an agreement (in the form of a contract) between scheme operator and conformity assessment bodies (CABs) is not at the national but rather at international level between FSC International and the CABs, and that there is no official FSC document where this requirement is made explicit. FSC International added that "such a contract however initiates the official start of the cooperation and licensing. So even if not included in a normative FSC document, it is common sense that one needs to enter into a contract first". The commission has checked with two CABs to confirm that they need to enter into a contract with FSC International before they can perform FSC audits, and the two CABs confirmed that this is correct. As a result, the commission concludes that the three NFSSs fully address management criterion 6 through contracts required for by FSC International.</p>
7	<p>The scheme manager has enforced effective procedures for handling complaints and appeal. Appeal is treated by persons that are not directly involved in the development and the management of the document.</p>	<p>The commission observed that the national scheme managers do not openly communicate on procedures for complaints and appeal, for instance, the website of FSC Canada does not include reference to complaint and appeal procedures.</p> <p>After input from FSC International, the commission looked into the FSC Dispute Network Partner Guide and concluded that – as this is a guidance document – national FSC offices can deviate from this and can have an own complaint and/or appeal procedure. Therefore the existence of this Guide does not automatically result in in compliance with the Dutch criterion.</p> <p>The Commission noted that within FSC, the development or revision of a national or regional standard starts with a proposal and a work plan. FSC document FSC-STD-60-006 V1-2 EN contains (in Annex 2) a requirement that the Work Plans must contain a paragraph on complaints. The suggested content of this paragraph from this Annex 2 reads:</p> <p>9. Complaints: (FSC-STD-60-006 section 13)</p> <p>Complaints related to the content of the approved standard shall be responded to by the Facilitator, by providing an explanation of why a particular point of view was not incorporated into the final standard</p>

		<p>submitted for approval, and/or explaining how the point may be raised again in relation to future revisions of the standard.</p> <p>Complaints related to procedural issues shall be responded to initially by the Facilitator. If the complainant is not satisfied with the explanation provided by the Facilitator, the complaint shall be addressed through the FSC Dispute Resolution process.</p> <p>FSC International did send the paragraph on complaints from the Bulgarian, Portuguese and Canadian work plans (that led to the NFSSs that the commission is assessing). They include a copy of the suggested content of this paragraph (see above).</p> <p>The commission looked into the FSC Dispute Resolution process, which can be found here. This process is defined through FSC procedures FSC-PRO-01-009, FSC-PRO-01-008 and FSC-PRO-01-005 and other supporting documents. These are the documents that also apply for FSC International and that the commission already assessed (see paragraph 4.2 of the full report).</p> <p>The commission therefore concludes that FSC distinguishes two different responsibilities for complaint and appeal:</p> <ol style="list-style-type: none"> 1. During the development of NFSSs, the National Standard Development Groups are responsible. They incorporated the FSC complains and appeal procedures (FSC-STD-60-006 section 13 and the FSC Dispute Resolution process) into their work plans and fully address the requirements of criterion 7. 2. During times when the national scheme is not developed/updated, the management of the scheme is in the hands of FSC Int, which has been assessed by the commission for management criterion 7 (see paragraph 4.2 of the main report) resulting in the score "fully addressed ".
8	<p>The scheme manager has a scheme version management system in place.</p>	<p>All normative documents from FSC (both Int. and national and regional schemes) have a clearly indicated version number. Revised standard documents receive new version numbers (criterion 12.1 in FSC-STD-60-006 (V1-2)) which shows that a scheme version management system is in place. The maximum revision period is 5 years. The commission concludes that management criterion 8 is fully addressed by FSC International and by the approved FSC NFSSs.</p>

A5 Results of the assessment of the sustainability criteria

In this chapter A5, the commission presents the main findings of the assessment of the three NFSSs from the sample. As is explained in paragraph A2.3, the commission has only assessed the criteria for which FSC Int. was found to comply.

A5.1 Findings for FSC Bulgaria

The commission has assessed FSC Bulgaria against the Dutch sustainability criteria. The results of this assessment are given in the overview below. This table does not show names or descriptions of the individual criteria, please refer to the table in paragraph 4.3 of the main report for further details on the criteria.

Principle	Number of the criterion as related to the respective principle to the left							
	1	2	3	4	5	6	7	8
P1: GHG emissions	Grey							
P3: Carbon sinks	Grey	Grey	Light green					
P4: Long-term carbon debt	Dark green	Grey	Grey					
P5: Indirect Land Use Change (ILUC)	Grey							
P6: Laws and regulations	Dark green	Dark green	Dark green					
P7: Carbon sinks	Dark green	Light green	Light green	Dark green	Dark green			
P8: Regulating effect and quality, health and vitality of forest	Light green	Dark green	Dark green	Dark green	Light green	Dark green	Light green	Dark green
P9: Production capacity, safeguard future of forests	Dark green	Dark green						
P10: Management system	Dark green	Dark green	Dark green	Dark green	Dark green			
P11: Forest management by a group or regional association	Dark green	Dark green						

Legend

Dark green colour :	The sustainability criterion is fully addressed by FSC Bulgaria.
Light green colour :	The sustainability criterion is largely addressed the FSC Bulgaria. Supplementary verification is not needed.
Red colour :	The sustainability criterion is not or is insufficiently addressed by FSC Bulgaria. Additional verification is required for the entire sustainability criterion.
Grey colour :	Not assessed (see paragraph A2.3) .

The commission has observed that all criteria in the FSC Bulgaria standard are included in the same wording and in the same order as in documents FSC-STD-01-001 V5-2 and FSC-STD-60-004 V1-0. Also part of the indicators are in exact or almost exact the same wording. Other indicators are worded differently than the wording of the indicators in document FSC-STD-60-004 V1-0 “International Generic Indicators” but (to the opinion of the commission) have the same meaning. Occasionally the wording of indicators in FSC Bulgaria shows larger deviations from the wording of the International Generic Indicators. Still, the commission concluded in all cases that the differences in wording of indicators do not lead to another score as compared to FSC International. In the table below this is illustrated with some examples of variations found.

Sustainability criterion from the Dutch "regeling conformiteitsbeoordeling vaste biomassa voor energiedoeleinden"		ADBE observations and conclusion on the wording of relevant criteria and indicators under FSC Bulgaria and FSC Int.
Principle 6: Relevant international, national, regional and local laws and regulations are complied with		
6.1	The forest manager holds the legal right to use the forest.	Both FSC International and FSC Bulgaria comply with Dutch sustainability criterion 6.1 based on FSC criteria 1.1, 1.2 and 1.3. The commission observed that FSC Bulgaria does not include the IGI indicator 1.1.2 "Legal* tenure* is granted by a legally competent* authority according to legally prescribed processes". This does not change the judgement of the commission which is based on criteria 1.1, 1.2 and 1.3 which are exactly the same in FSC Bulgaria and FSC International.
Principle 7: Biodiversity is maintained and where possible enhanced		
7.1	Sites with high conservation values and representative areas of the forest types that are found in the forest management unit have been identified and are protected and where possible enhanced. The sites may contain one or more of the following values: diversity of species, ecosystems and habitats, ecosystem services, ecosystems at landscape level and cultural values.	When performing the assessment on Dutch sustainability criterion 7.1, the commission has noted that: <ul style="list-style-type: none"> the Bulgarian FSC scheme FSC-STD-BGR-01-2016 does not include the indicator 6.3.2 "Where negative impacts on environmental values* occur, measures are taken to mitigate or prevent further damage, and/or damaged values are repaired" which is included in the International Generic Indicator document FSC-STD-60-004 V1-0; and the Bulgarian FSC scheme FSC-STD-BGR-01-2016 does not include Principle 3 and criteria 3.1 - 3.6 as indigenous people do not occur in Bulgaria. The above does not influence the judgement on the commission on Dutch sustainability criterion 7.1. Dutch criterion 7.1 is fully addressed, both by FSC Int. and by FSC Bulgaria, based on criteria 9.1 and 9.2 (for first part on HCV's) and on criteria 6.1, 6.5 and 6.6 (second part on representative areas of the forest types).
7.3	The conversion of forests within the forest management unit to other forms of land use, including wood plantations, is not permitted unless: <ul style="list-style-type: none"> - the area concerned is small which means the total converted area over the years is no greater than 5% of the area of the forest management unit on benchmark date 1 January 2008; and - it clearly leads to long-term advantages for nature conservation; and - there is no damage or threat of damage to sites with high conservation values. 	The commission found a number of differences on indicator level: <ul style="list-style-type: none"> FSC Bulgaria differentiates between "plantations" and "forest cultures". In the Bulgarian context the main difference between Forest cultures and plantations is that short rotations are not planned and implemented in Forest cultures. Forest cultures therefore often have or gain many of the characteristics of natural forests. Where the International Generic Indicators (FSC-STD-60-004 V1-0) includes one indicator for criterion 6.9, the Bulgarian FSC scheme FSC-STD-BGR-01-2016 includes two indicators, namely one for "plantations" and one for "forest cultures". To the opinion of the commission this does not lead to a different score for FSC Bulgaria as compared to FSC International. Under indicator 6.9.1. FSC Bulgaria has – in comparison to the IGI's – added an extra exception: conversion of natural forests can be accepted when "the conversion is related to the construction of infrastructure of national importance, as well as sites related to national security and defence". The commission is of opinion that FSC Bulgaria cannot avoid such a conversion when it is demanded by the Bulgarian government, and also that it is unlikely that biomass will structurally be sourced from infrastructure of national importance and/or sites related to national security and defence. As a result, this extra exception clause does not result in another conclusion from the commission. The commission concludes that both FSC Bulgaria and FSC International fully address Dutch sustainability criterion 7.3 based on FSC criterion 6.9 plus the FSC definition (Glossary of Terms) of "very limited portion".
7.4	In the case of wood plantations, there is a preference for native species, and a relevant percentage of the plantation must be able to revert to natural forest at a later stage.	FSC Bulgaria contains the same two criteria 6.5 and 10.2 as FSC International, and – as compliance of FSC Int. with Dutch criterion 7.4 was based on these two criteria – also addresses Dutch sustainability criteria 7.4. However, as compared to the International Generic Indicators (FSC-STD-60-004 V1-0) which includes two indicators 10.1.1 and 10.1.2 to criterion 10.1, FSC Bulgaria adds a number of additional indicators 10.1.3 – 10.1.9 to criterion 10.1. For the assessment of Dutch criterion 7.4, indicator 10.1.5 is of interest. The commission

		<p>concludes that indicator 10.1.5 is more stringent than criterion 10.2 as, in cases where the objective is transformation of the forest plantation into forests with more natural species composition and structure, only native species and origins are used, whereas criterion 10.2 allows using other species and origins when “there is clear and convincing justification for using others”.</p> <p>The commission therefore concludes that on this point the FSC Bulgarian standard is slightly more stringent as compared to FSC International.</p>
7.5	Exploitation of non-timber forest products, including products from hunting and fishing, is regulated, monitored and controlled, among others to safeguard the maintenance of the biodiversity in the forests.	<p>Indicator 5.2.4 from the International Generic Indicators (FSC-STD-60-004 V1-0) is implemented into the Bulgarian FSC standard through two indicators 5.2.4 and 5.2.5 which contain a slightly higher level of detail and which describe a situation where an exception cannot be avoided: Exceptions are permitted only in the cases of large scale natural disturbances* that cannot be compensated by the planned total harvesting levels for the period of the current forest management plan.</p> <p>The commission concludes that this extra level of detail does not lead to a different score; both FSC International and FSC Bulgaria fully address Dutch criterion 7.5.</p>
<p>Principle 8: The regulating effect and the quality, health and vitality of the forest are maintained and where possible enhanced</p>		
8.5	If fires are used to achieve forest management objectives, such as regeneration of specific tree species, then adequate control measures have been taken.	<p>At indicator level there are some differences between FSC Internationals (IGI’s – International Generic Indicators) and FSC Bulgaria:</p> <ul style="list-style-type: none"> For indicator 6.3.1 FSC Bulgaria adds a requirement that the plans are put on paper; IGI indicator 6.3.2 “Where negative impacts on environmental values* occur, measures are taken to mitigate or prevent further damage, and/or damaged values are repaired” is not implemented in FSC Bulgaria, IGI indicator 6.3.3 is implemented as indicator FSC Bulgaria indicator 6.3.2. <p>The commission concludes that this does not result in a different score as – when negative impacts to environmental values are not prevented (IGI 6.3.2), both IGI (6.3.3) and FSC Bulgaria (6.3.2) require that measures are adopted to prevent further damage, and that negative impacts are mitigated* and/or repaired.</p> <p>Based on criteria 6.2 and 6.3 the commission concludes that both FSC International as FSC Bulgaria largely address Dutch sustainability criterion 8.5.</p>
8.6 and 8.7		FSC Bulgaria includes two extra indicators (10.7.2 and 10.7.9) as compared to IGI, this does not change the score by the commission.
<p>Principle 10: Sustainable forest management is achieved through a management system</p>		
10.1	The forest management system is designed to achieve the objectives of a forest management plan and covers the cycle of inventory, analysis, planning, implementation, monitoring, evaluation and adjustment.	<p>IGI indicators 7.2.1 and 7.2.2 and IGI indicator 7.3.1 are implemented in FSC Bulgaria by a larger number of more detailed indicators: 7.2.1 – 7.2.12 and 7.3.1 – 7.3.8, respectively. The differences are at a detailed level and they do not change the score by the commission for this sustainability criterion, which is that the Dutch criterion is fully addressed based on FSC criteria 7.1-7.4 and 8.1-8.3.</p>

A5.2 Findings for FSC Canada

The commission has assessed FSC Canada against the Dutch sustainability criteria. The results of this assessment are given in the overview below. This table does not show names or descriptions of the individual criteria, please refer to the table in paragraph 4.3 of the main report for further details on the criteria.

Principle	Number of the criterion as related to the respective principle to the left							
	1	2	3	4	5	6	7	8
P1: GHG emissions	Grey							
P3: Carbon sinks	Grey	Grey	Light green					
P4: Long-term carbon debt	Light green	Grey	Grey					
P5: Indirect Land Use Change (ILUC)	Grey							
P6: Laws and regulations	Light green	Light green	Light green					
P7: Carbon sinks	Light green	Light green	Light green	Light green	Light green			
P8: Regulating effect and quality, health and vitality of forest	Light green	Light green	Light green	Light green	Light green	Light green	Light green	Light green
P9: Production capacity, safeguard future of forests	Light green	Light green						
P10: Management system	Light green	Light green	Light green	Light green	Light green			
P11: Forest management by a group or regional association	Light green	Light green						

Legend

Dark green colour :	The sustainability criterion is fully addressed by FSC Canada.
Light green colour :	The sustainability criterion is largely addressed the FSC Canada Supplementary verification is not needed.
Red colour :	The sustainability criterion is not or is insufficiently addressed by FSC Canada. Additional verification is required for the entire sustainability criterion.
Grey colour :	Not assessed (see paragraph A2.3) .

The commission has observed that all criteria in the FSC Canada standard are included in the same wording and in the same order as in documents FSC-STD-01-001 V5-2 and FSC-STD-60-004 V1-0. With respect to the International Generic Indicators (IGIs, from document FSC International document FSC-STD-60-004 V1-0), FSC Canada has adapted many of the indicators, changing wording and/or adding details. As a result of the assessment of FSC International and of FSC Canada against the Dutch sustainability criteria, the commission concluded that in most cases the differences in wording of indicators do not lead to another score. There is one exception for criterion 7.5, see below. The table below illustrates with some examples the differences in (wording of) indicators between FSC International and FSC Canada.

Sustainability criterion from the Dutch "regeling conformiteitsbeoordeling vaste biomassa voor energiedoeleinden"		ADBE observations and conclusion on the wording of relevant criteria and indicators under FSC Canada and FSC Int.
Principle 6: Relevant international, national, regional and local laws and regulations are complied with		
6.1	The forest manager holds the legal right to use the forest.	FSC Canada has "dropped" the following three IGI's: <ul style="list-style-type: none"> 1.1.2 "Legal registration* is granted by a legally competent* authority according to legally prescribed processes"; 1.2.2 "Legal tenure is granted by a legally competent authority

		<p><i>according to legally prescribed processes"; and</i></p> <ul style="list-style-type: none"> 1.3.3 "Activities covered by the management plan are designed to comply with all applicable laws". <p>However, the commission is of opinion that - based on FSC Canada criteria 1.1, 1.2 and 1.3 plus underlying indicators, Dutch sustainability criterion 6.1 is fully addressed by FSC Canada. The dropping of three indicators by FSC Canada does not lead to a lower score for FSC Canada as compared to FSC International as the remaining FSC Canada indicators under criteria 1.1, 1.2 and 1.3 are adequate for showing compliance to these criteria.</p>
<p>Principle 7: Biodiversity is maintained and where possible enhanced</p>		
7.5	Exploitation of non-timber forest products, including products from hunting and fishing, is regulated, monitored and controlled, among others to safeguard the maintenance of the biodiversity in the forests.	The FSC Int. document FSC-STD-60-004 V1-0 contains a number of indicators which cover the exploitation of NTFP's, for instance 5.2.4, 6.6.4 and 10.11.1. The FSC Canada scheme is - in its indicators, less explicit on NTFPs as the indicators under criteria 6.6 and 10.11 do not cover NTFPs. The commission is of opinion that FSC Canada addresses Dutch sustainability criterion 7.5 on the basis of criteria 5.2 (including indicator 5.2.4), 6.6 and 10.11. However, due to the fact that NTFPs are only included in the indicators of criterion 5.2, the commission concludes that FSC Canada largely addresses Dutch sustainability criterion 7.5 whereas this criterion was found to be fully addressed when the commission assessed the FSC International meta scheme documents FSC-STD-01-001 V5-2 and FSC-STD-60-004 V1-0.
<p>Principle 8: The regulating effect and the quality, health and vitality of the forest are maintained and where possible enhanced</p>		
8.1	The soil quality of the forest management unit is maintained and if necessary improved, with special attention to coasts, river banks, erosion-sensitive areas and sloping landscapes.	When implementing the IGIs, FSC Canada has dropped the IGIs 10.10.1, 10.10.2 and 10.10.3 which (amongst others) are on the prevention, mitigation and repair of "disturbance or damages to ..[.]., soils, ..[.].". FSC Canada has implemented these requirements in indicators 6.3.1 - 6.3.6 (which require the effective implementation of specified measures to protect soils from physical damage, affecting soil erosion and compaction, ..) and 6.3.7. (on prevention, mitigation and repair of negative damages caused to soils and the productive forest area). As a result, the commission concludes that although FSC Canada did not 1:1 implement the IGI's, it covers the same elements on soil quality and hence fully addresses Dutch management criterion 8.1, in a similar way as FSC International does, through FSC criteria 6.3, 6.4, 6.7, 9.1-9.4, 10.6 and 10.10 plus underlying indicators.
8.7	The use of chemicals is only permitted if ecological processes and the optimal deployment of sustainable alternatives prove insufficient. Pesticides classified as Type 1A and 1B by the World Health Organisation and chlorinated hydrocarbons are not permitted.	An example of how FSC Canada has adapted and added detail to an indicator, is the implementation of IGI 10.7.5. IGI 10.7.5 reads " <i>If pesticides are used, application methods minimize quantities used, while achieving effective results, and provide effective protection to surrounding landscapes</i> ". FSC Canada indicator 10.7.6 (adapting IGI 10.7.5, as an extra indicator 10.7.2 was added) reads " <i>When pesticides are used:</i> 1. <i>Measures are employed to avoid contamination of surface and ground water;</i> 2. <i>The selected pesticide, application method, timing and pattern of use offers the least risk* to humans and environmental values*;</i> and 3. <i>While achieving effective results, quantities of pesticide* used are minimized. (Adapt IGI 10.7.5)</i> ". This level of detail does not result in a different score from the commission for FSC Canada as compared to FSC International; both score "largely addressed". The score is not "fully addressed" as - for pesticides classified as Type 1A and 1B by the WHO - FSC does allow derogations which are however strictly regulated (they are temporary, they apply to a restricted area only and they are to be approved by the FSC Pesticides Committee).
<p>Principle 10: Sustainable forest management is achieved through a management system</p>		
10.1	The forest management system is designed to achieve the objectives of a forest management plan and covers the cycle of inventory, analysis, planning, implementation, monitoring,	An example of how FSC Canada has adapted IGIs by adding more details, is indicator 7.3.1. IGI 7.3.1 reads " <i>Verifiable targets, and the frequency that they are assessed, are established for monitoring the progress towards each management objective</i> ". FSC Canada indicator 7.3.1 reads " <i>Verifiable targets are established to ensure progress towards each management objective, and are</i>

	<p>evaluation and adjustment.</p>	<p><i>used as the basis for monitoring, as described in Principle 8. Targets are measurable (where possible), address short-term and long-term time frames (as applicable), and each is supported by a rationale, including underlying assumptions".</i></p> <p>Both for FSC International and FSC Canada, the commission based its conclusion (that criterion 10.1 is fully addressed) on FSC criteria 7.1-7.4 and 8.1-8.3. The difference in level of detail for a number of the underlying indicators does not change the score from the commission, as the indicators have a similar coverage.</p>
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A5.3 Findings for FSC Portugal

The commission has assessed FSC Portugal against the Dutch sustainability criteria. The results of this assessment are given in the overview below. This table does not show names or descriptions of the individual criteria, please refer to the table in paragraph 4.3 of the main report for further details on the criteria.

Principle	Number of the criterion as related to the respective principle to the left							
	1	2	3	4	5	6	7	8
P1: GHG emissions	Grey							
P3: Carbon sinks	Grey	Grey	Light green					
P4: Long-term carbon debt	Dark green	Grey	Grey					
P5: Indirect Land Use Change (ILUC)	Grey							
P6: Laws and regulations	Dark green	Dark green	Dark green					
P7: Carbon sinks	Dark green	Light green	Light green	Dark green	Dark green			
P8: Regulating effect and quality, health and vitality of forest	Light green	Dark green	Dark green	Dark green	Light green	Dark green	Light green	Dark green
P9: Production capacity, safeguard future of forests	Dark green	Dark green						
P10: Management system	Dark green	Dark green	Dark green	Dark green	Dark green			
P11: Forest management by a group or regional association	Dark green	Dark green						

Legend

Dark green colour :	The sustainability criterion is fully addressed by FSC Portugal.
Light green colour :	The sustainability criterion is largely addressed the FSC Portugal. Supplementary verification is not needed.
Red colour :	The sustainability criterion is not or is insufficiently addressed by FSC Portugal. Additional verification is required for the entire sustainability criterion.
Grey colour :	Not assessed (see paragraph A2.3) .

The commission has observed that all criteria in the FSC Portugal standard are included in the same wording (with one small exception, see under criterion 8.1 below) and in the same order as in documents FSC-STD-01-001 V5-2 and FSC-STD-60-004 V1-0. Moreover, for many of the criteria also the indicators are in exact or almost exact the same wording. The commission has determined where the wording of indicators in FSC Portugal deviated from the wording of the indicators in document FSC-STD-60-004 V1-0 “International Generic Indicators” and has concluded that the differences in wording of indicators do not lead to another score compared to FSC Int. In the table below differences on indicator level are illustrated.

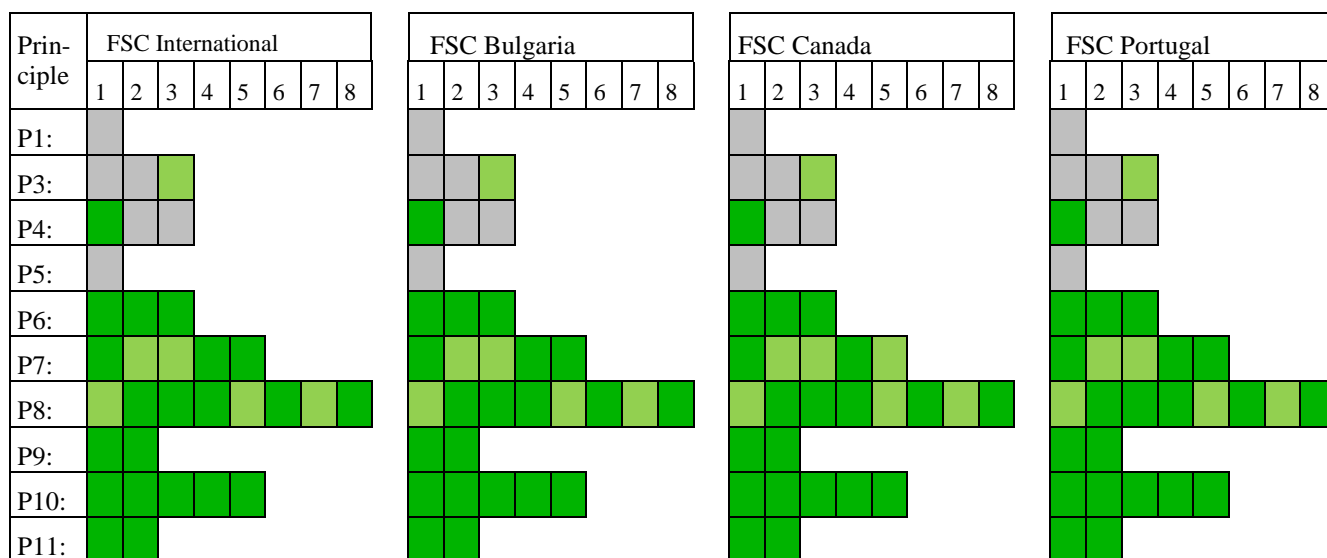
Sustainability criterion from the Dutch “regeling conformiteitsbeoordeling vaste biomassa voor energiedoeleinden”	ADBE observations and conclusion on the wording of relevant criteria and indicators under FSC Portugal and FSC Int.
Principle 4: The use of biomass does not result in a long-term carbon debt	
4.1	The forest management unit where the wood is sourced is managed with the aim of retaining or increasing carbon stocks in the medium or long term.
	Indicator 5.2.5 of FSC Portugal reads “ <i>The harvest level of non-timber forest products under the organization’s control is based on the best information available and complied with accordingly</i> ”. This indicator implements IGI 5.2.4 (as IGI 5.2.3 was implemented by FSC Portugal by splitting it into two indicators). The wording of these indicators is different, the wording of IGI 5.2.4 is “For

		<p><i>extraction of commercially harvested services and non-timber forest products* under The Organization's* control a sustainable harvest level is calculated and adhered to. Sustainable harvest levels are based on Best Available Information*."</i></p> <p>The commission concluded that the wording of the Portuguese indicator 5.2.5 is not as strong as the wording of IGI 5.2.4, however this does not lead to another conclusion as compared to the conclusions for FSC Int., which is that Dutch criterion 4.1 is fully addressed by FSC Portugal based on criteria 5.2 and 6.3 plus underlying indicators.</p>
<p>Principle 7: Biodiversity is maintained and where possible enhanced</p>		
7.4	<p>In the case of wood plantations, there is a preference for native species, and a relevant percentage of the plantation must be able to revert to natural forest at a later stage.</p>	<p>FSC Portugal has added an extra criterion as compared to the criteria in FSC Int. The extra criterion reads (including indicator).</p> <p>10.1: The Organization shall use silvicultural practices that are ecologically appropriate for the vegetation, species, sites and management objectives. 10.1.1 Silvicultural practices are implemented that are ecologically appropriate for the vegetation, species, sites, and management objectives.</p> <p>This extra criterion does not change the judgement of the commission, which is that Dutch sustainability criterion 7.4 is fully addressed by FSC Portugal based on criteria 6.5 and 10.3 from FSC-STD-PRT-01 2016.</p>
<p>Principle 8: The regulating effect and the quality, health and vitality of the forest are maintained and where possible enhanced</p>		
8.8	<p>The accumulation of inorganic waste and litter is prevented or such waste and litter is collected, stored in approved areas and disposed of responsibly.</p>	<p>In comparison to the FSC International Generic Indicators, FSC Portugal has added three additional indicators (numbers 10.12.2, 10.12.3 and 10.12.4) on collection, storage and disposal of waste. This does not lead to another conclusion as compared to the conclusion for FSC International, which is that Dutch criterion 8.8 is fully addressed as the responsible collection, transportation and disposal of waste is covered by criterion 10.12 plus indicators 10.12.1 – 10.12.4.</p>
<p>Principle 9: The production capacity for wood products and relevant non-timber forest products is maintained in order to safeguard the future of the forests</p>		
9.1	<p>The production capacity of all forest types represented in the forest management unit is maintained.</p>	<p>The commission observed small differences in the wordings of indicators, and FSC Portugal has split some indicators as compared to the International Generic Indicators. The commission comes to the same judgement for FSC Portugal as compared to FSC International: fully addressed.</p>
<p>Principle 10: Sustainable forest management is achieved through a management system</p>		
10.1	<p>The forest management system is designed to achieve the objectives of a forest management plan and covers the cycle of inventory, analysis, planning, implementation, monitoring, evaluation and adjustment.</p>	<p>The commission found one small modification of a FSC criterion (when implementing the International Generic Indicators into a national standard): criterion 8.1 from FSC Portugal (document FSC-STD-PRT-01 2016) reads <i>"The Organization shall monitor the implementation of its management plan, including its policies and objectives, its progress with the activities planned, and the achievement of its verifiable targets"</i>, whereas criterion 8.1 from FSC International (FSC-STD-01-001 V5-2 and FSC-STD-60-004 V1-0) reads <i>"The Organization* shall* monitor the implementation of its Management Plan*, including its policies and management objectives*, its progress with the activities planned, and the achievement of its verifiable targets*."</i> (the word "management" has been made bold by the commission to indicate the difference). The commission concludes that Dutch sustainability criterion 10.1 including all sub-requirements on inventory, analysis, planning, implementation, monitoring, evaluation and adjustment cycle are fully addressed by FSC Portugal through criteria 7.1-7.4 and 8.1-8.3 from FSC-STD-PRT-01 2016. This is the same score as for FSC International.</p>

A6 Conclusion from the assessment of a sample of FSC NFFSs

The commissions’ assessment on a sample of FSC NFFSs (the FSC P&C V5 approved schemes from Bulgaria, Canada and Portugal) leads to the conclusion that FSC Int. and the three NFFSs comply with the same sustainability criteria plus all management criteria.

The results on the assessment of compliance to the Dutch sustainability criteria are summarised in the figure below; each individual part (4 total) of the figure is the same as one of the figures in paragraph 3.3 (for FSC Int.) and in paragraphs A5.1 – A5.3 (for the three FSC approved NFFSs). No important differences (changing cells from green to orange or red colour) occur for any of the criteria.



Legend

Dark green colour :	The sustainability criterion is fully addressed.
Light green colour :	The sustainability criterion is largely addressed. Supplementary verification is not needed.
Yellow colour :	The sustainability criterion is covered otherwise. Supplementary verification is not needed.
Orange colour :	The sustainability criterion is partly addressed. Supplementary verification or another approved certification scheme is needed for those elements that are not addressed.
Red colour :	The sustainability criterion is not or is insufficiently addressed. Additional verification is required for the entire sustainability criterion.
Grey colour :	Not assessed (see paragraph A2.3) .

As a result, the commission has confidence that the requirements and procedures of FSC for the development or modification of regional and national FSC schemes are sufficient to ensure that these regional and national FSC schemes comply with the same Dutch sustainability criteria as does the FSC Int. meta scheme. Therefore, the commission will advise to approve FSC International P&C V5 for the criteria mentioned in chapter 3, including the FSC regional and national standards (RFFSs and NFFSs) that have been approved for this version P&C V5. However, this does not include FSC Interim National Standards as no INS was assessed as part of the sample.

The commission has not assessed regional or national standards that were FSC approved for earlier versions of the FSC Int. criteria and cannot conclude whether those versions comply with the same Dutch sustainability criteria. Hence the commission will advise not to approve these standards.

Annex B – Biomass categories and the CoC system

The sustainability and management criteria in paragraphs 4.2 and 4.3 are a translation from the criteria in Annexes B and C of the Dutch regulation on conformity assessment of solid biomass for energy production. In Annex D of this regulation two tables show which requirements apply to the five categories and the set-up of the chain of custody. In the explanatory notes to the legislation a table can be found with additional guidance to the requirements.

Biomass categories and the chain of custody system

There are five biomass categories for which the sustainability requirements apply. Table 1 lists for each category which sustainability requirements apply:

Table 1. Biomass category’s with the applicable sustainability requirements

Sustainability requirements Category	Greenhouse gas emission	Soil management	Carbon and land use change	Sustainable forest management	Chain of custody
1. Woody biomass from forest management units	1.1		3.1-3.3, 4.1-4.3, 5.1	6.1-6.3, 7.1-7.5, 8.1-8.8, 9.1-9.2, 10.1-10.5, 11.1-11.2	12.1-12.6, 13.1-13.3
2. Woody biomass from forest management units less than 500 ha	1.1		3.1-3.3, 4.1-4.3	6.1-6.3, 7.1-7.5, 8.1-8.8, 9.1-9.2, 10.1-10.5, 11.1-11.2	12.1-12.6, 13.1-13.3
3. Residues from nature and landscape management	1.1	2.1			12.1-12.6, 13.1-13.3
4. Agricultural residues	1.1	2.1			12.1-12.6, 13.1-13.3
5. Biogenic residues and waste	1.1				12.1-12.6, 13.1-13.3

The source of the five categories and controlled biomass has to be known for each consignment. The conformity assessment by a conformity assessment body starts at the first link of the chain of custody. In Table 2 for each category the source of the material and the first link of the chain of custody are listed.

Table 2. Distinction between the source and the first link in the chain of custody per biomass category

Category	Source	First link chain of custody
1. Woody biomass from forest management units	Forest management unit	Forest management unit
2. Woody biomass from forest management units less than 500 ha	Forest management unit or predefined supply base of which the forest management unit <500 ha forms a part	Forest management unit or biomass producer
3. Residues from nature and landscape management	Predefined supply base	First collection point
4. Agricultural residues	Predefined supply base	First collection point
5. Biogenic residues and waste	Company that generates the residues or waste	First collection point

As part of the SDE+ subsidy scheme a temporary exemption applies for category 2 biomass regarding the first link of the chain of custody. For this category either the forest management unit or the biomass producer can be the first link. In case the biomass producer is the first link a risk based approach is used to demonstrate compliance with the sustainable forest management requirements.

Annex C – Abbreviations

ADBE	Advisory commission on Sustainability Biomass for Energy applications
CABs	Conformity assessment bodies
CITES	Convention on International Trade in Endangered Species
CoC	Chain-of-Custody
EU	European Union
EZK	“Ministry of EZK” is the Dutch Minister of Economic Affairs and Climate Policy
FMU	Forest Management Unit
FSC	Forest Stewardship Council
GHG	GreenHouse Gas
HCV	High Conservation Value
HHP	Highly Hazardous Pesticides
IGI	International Generic Indicators
ILUC	Indirect Land Use Change
INSs	Interim national standards
IUCN	International Union for Conservation of Nature
NFFS	National Forest Stewardship Standard
NSDG	National Standard Development Group
NTFP	Non-Timber Forest Product
P&C V4	Principles and Criteria version 4
P&C V5	Principles and Criteria version 5
RFFS	Regional Forest Stewardship Standard
SDE+	A Dutch subsidy scheme (feed-in tariff) for production of renewable energy
SFM	Sustainable Forest Management
SLIMF	Small and Low Intensity Managed Forests
WHO	World Health Organization