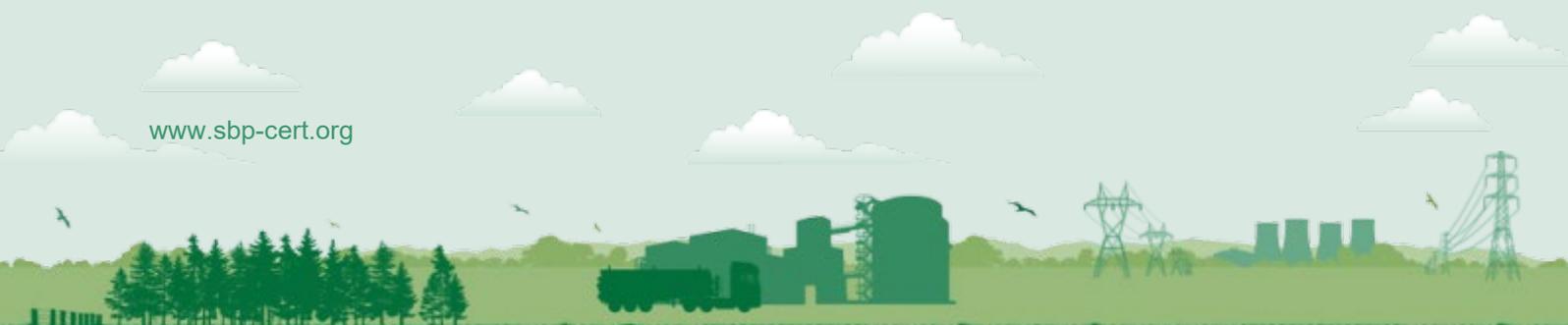


# Supply Base Report: Template for Biomass Producers

**BIMATRA**

[www.sbp-cert.org](http://www.sbp-cert.org)



## Completed in accordance with the Supply Base Report Template Version 1.3

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

### *Document history*

*Version 1.0: published 26 March 2015*

*Version 1.1 published 22 February 2016*

*Version 1.2 published 23 June 2016*

*Version 1.3 published 14 January 2019*

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# 1 Overview

Producer name: BIMATRA bvba  
 Producer location: Industrielaan 6, 8770 Ingelmunster, Belgium  
 Geographic position: 50°55'50.5"N 3°14'51.0"E (50.930694, 3.247488)  
 Primary contact: Bart De Clerck, +32 495294050, bart@bimatra.be  
 Company website: [www.bimatra.be](http://www.bimatra.be)  
 Date report finalised: Bart de Clerck, 30-9-2019; format 26-9-2019  
 Close of last CB audit: 3<sup>rd</sup> of December 2019, Ingelmunster  
 Name of CB: NEPCon  
 Translations from English: No  
 SBP Standard(s) used: Standard 1 version 1.0 + standards 2,4 and 5 + guideline docs.  
 Weblink to Standard(s) used: <https://sbp-cert.org/documents/standards-documents/standards>  
 SBP Endorsed Regional Risk Assessment: NA  
 Weblink to SBE on Company website: <https://www.bimatra.be/nl/certificaten>

Indicate how the current evaluation fits within the cycle of Supply Base Evaluations				
Main (Initial) Evaluation	First Surveillance	Second Surveillance	Third Surveillance	Fourth Surveillance
<b>X</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## 2 Description of the Supply Base

### 2.1 General description

#### Description of the supply base

##### General summary Bimatra activities.

Bimatra is a forest contractor that produces and sells wood chip. Wood chip production is approx. 0-200.000 tonnes a year. Around 35% of the primary wood chip is produced in areas outside forests, mainly roadside, riverside and train site cuttings and small plantations. The base also includes clearing of trees and shrubs in connection with developments and expansion of infrastructure in Belgium. In the forests (65% of primary feedstock), the base is thinning of mainly broadleaves while the rest is branches and tops from both broadleaves and conifers. In Wallonia you find more often conifers.

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

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

Two certification options exist in forest management in Belgium: PEFC and FSC. The areas owned by the Belgian states have been mostly certified according to one or to both standards. In private and municipal forests, some have been certified according to PEFC and some according to FSC but there are also lots of (mostly small) forests that are not certified. But in Belgium you always have the obligation to plant the same number of trees you cut on the same ground or on another. At the moment (Sept 2019) Bimatra is not buying any controlled feedstock (FSC, or other SBP certificate holders) as none is available.

#### Detailed description of the supply base

##### Forest classification and landownership

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

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

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

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

None of the country's primary forests remain, and 58% of existing forest cover comprises forest plantations. Forests owned by private persons are mainly plantations (predominantly poplar or pine in Flanders, and spruce

or other conifers in Wallonia). Public forests, as well as forests owned by nature conservation organizations, are rather mixed forests and generally have a higher share of broadleaved tree species (oak, beech, etc.).

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

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

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

The official definition of forest in Flanders is: '*forests are land areas where trees and woody shrub vegetation are the main elements, with its own flora and fauna and fulfilling one or more functions*' (Forest decree/law 1990).

The official definition of forest in Wallonia is: '*These are lands of woods and forests such as areas covered by natural habitats, wood deposits, fauna feeding places, marshes, ponds and firebreaks.*' (Code forestier 2008).

#### Protection categories

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

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

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

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

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

Nature 2000

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

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

FSC certification

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

International agreements

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

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

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

Based on FAO resource assessment 2015. In average around 3 680 000 m3 of wood is harvested each year in Belgium. Bimatra uses around 0-200.000 tons of woodchips per year. With an average density of 0.6 g/cm<sup>3</sup> (or 600 kg/m3) this means around 0-300.000 m3 of harvested timber (wet).

CITES

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

Other supply base categories.

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

**Overview of feedstock**

See also 2.4 below for the graphic. The following feedstocks are identified *Reporting period: Dec-2018-Nov 2019 (12 months)*..:

A	B	C	D	E	F	G	M
#	Feedstock type for	Origin	Physical Description	Country of harvest	Raw mass as received	Moisture % as received	Specify any pre-processing.

	biomass production			(new row for each country)	in metric tonnes	(weighted average, single figure) <sup>2</sup>	(chipping, drying, none)
1	Thinning from (semi-)natural forests	Residues without stumps (e.g. branches and tops)	Chips	Belgium	0-200.000	45	chipping
2	Final harvest from plantations	Residues without stumps (e.g. branches and tops)	Chips	Belgium	0-200.000	45	chipping

\*See for annex 10 about special procedures about dealing with this feedstock.

### Species mix

The following species mix is used.

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

<i>Quercus robur</i>	2	Chênes pédonculés	Zomereik	English oak
<i>Quercus rubra</i>	2	chênes rouge d'Amérique	Amerikaanse Eik	American red oak
<i>Robinia pseudoacacia</i>	2	Robinier	Robinia	Black locust
<i>Salix alba</i>	2	Saule	Wilg	Willow
<i>Sorbus aucuparia</i>		Sorbier des oiseleurs	Wilde Lijsterbes	
<i>Tilia cordata</i>	2	Tilleul	Winterlinde	Lime
<i>Ulmus minor</i>	2	Orme	Gladde lep	Elm

\*Categories used for internal use and sales:

- 1 – CONIFERS
- 2 – BROADLEAVES
- 3 – MIXED of 1 and 2

## 2.2 Actions taken to promote certification amongst feedstock supplier

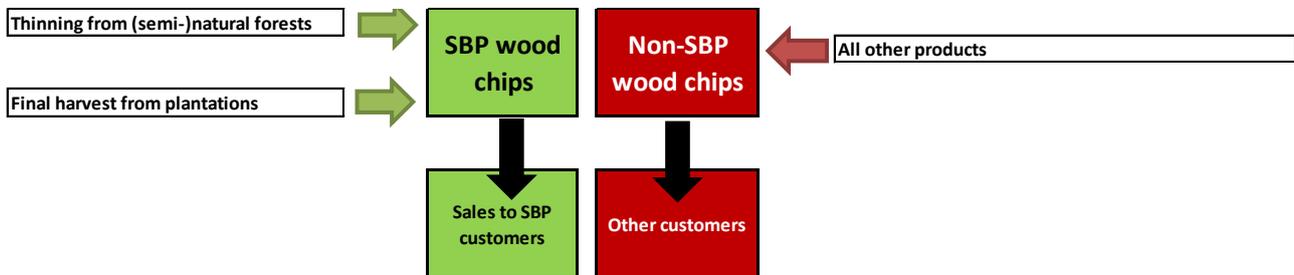
No measures have been launched to further certification at the forests where raw materials are felled.

## 2.3 Final harvest sampling programme

The suppliers of woodchips from Belgium include feedstock from final fellings > 40 years old. No process for sampling is undertaken as national statistics are used as an indicator. Final fellings as an average are 20% of harvested wood volume (European average figure). The age distribution of stands of forests in Belgium where they are > 40 years old is 45%. As a maximum average this represents 9% of the wood delivered from the supplier where wood is from final fellings that are > 40 years old.

Many years of data is available to check. But for the moment to further samples seems to be needed.

## 2.4 Flow diagram of feedstock inputs showing feedstock type



### Transport after sales

With Bimatra there are two options when selling SBP feedstock:

- Trucks are loaded at the collecting locations (in the forest, along roadsides etc) and are directly transported to the port for shipping. Material is sold 'at port gate'. Meaning that when the biomass is unloaded at the collection point at the port it is already in ownership of the customer.
- *Optional for 2020 (to be assessed during next audit): Material is processed and collected at the Bimatra plant first (where SBP and non-SBP is separated) and then trucks are loaded for the port for shipping transport, or for other customers by road transport. Such material is also sold 'at port gate'. Meaning that when the biomass is unloaded at the collection point at the port it is already in ownership of the customer.*

## 2.5 Quantification of the Supply Base

Reporting period: Dec-2018-Nov 2019 (12 months).

### Supply Base

a. Total Supply Base area (ha): cumulative area of all forest types within SB	692.916 hectares
b. Tenure by type (ha): privately owned/public/community concession	<ul style="list-style-type: none"> <li>• 58% of all forests are owned by around 100.000 <u>private</u> owners, with an average of 2,5 ha per owner.</li> <li>• 42% of the forests are owned by the <u>public</u> ('gewesten/regions' (11%), municipalities (28%), provinces and other organisation like the military (3%).</li> </ul>
c. Forest by type (ha): boreal/temperate/tropical	100% temperate
d. Forest by management type (ha): plantation/managed natural/natural	35% plantation, 65% from semi natural managed forests. No natural forest exists in Belgium.
e. Certified forest by scheme (ha): (e.g. hectares of FSC or PEFC-certified forest)	FSC: 25 815 ha PEFC: 300 999 ha

## Feedstock

<p>f. Total volume of Feedstock: tonnes or m<sup>3</sup> - volume may be shown in a banding between XXX,000 to YYY,000 tonnes or m<sup>3</sup> if a compelling justification is provided*</p>	<p>0 – 200,000 tonnes This is a used band, real figures are confidential because of commercial reasons, and only included in the SAR document.</p>
<p>g. Volume of <b>primary feedstock</b>: tonnes or m<sup>3</sup> - volume may be shown in a banding between XXX,000 to YYY,000 tonnes or m<sup>3</sup> if a compelling justification is provided*</p>	<p>0 – 200,000 tonnes This is a used band, real figures are confidential because of commercial reasons, and only included in the SAR document.</p>
<p>h. List percentage of primary feedstock (g), by the following categories. - percentages may be shown in a banding between XX% to YY% if a compelling justification is provided*. Subdivide by SBP-approved Forest Management Schemes:</p> <ul style="list-style-type: none"> <li>- Certified to an SBP-approved Forest Management Scheme</li> <li>- Not certified to an SBP-approved Forest Management Scheme</li> </ul>	<p>Certified: 0% of total annual feedstock Not certified: 100%. (Over the last reporting period around 10% came from certified sources, but were not sold to Bimatra with such a claim).Therefore 0% at the moment.</p>
<p>i. List all species in primary feedstock, including scientific name</p>	<p>See table under 2.1</p>
<p>j. Volume of primary feedstock from primary forest</p>	<p>0% (no primary forests remains in Belgium)</p>
<p>k. List percentage of primary feedstock from primary forest (j), by the following categories. Subdivide by SBP-approved Forest Management Schemes:</p> <ul style="list-style-type: none"> <li>- Primary feedstock from primary forest certified to an SBP-approved Forest Management Scheme</li> <li>- Primary feedstock from primary forest not certified to an SBP-approved Forest Management Scheme</li> </ul>	<p>NA</p>
<p>l. <b>Volume of secondary feedstock</b>: specify origin and type - the volume may be shown as a % of the figure in (f) and percentages may be shown in a banding between XX% to YY% if a compelling justification is provided*.</p>	<p>NA</p>
<p>m. Volume of tertiary feedstock: specify origin and composition - the volume may be shown as a % of the figure in (f) and percentages may be shown in a banding between XX% to YY% if a compelling justification is provided*.</p>	<p>NA</p>

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

Bands for (f) and (g) are:

1. 0 – 200,000 tonnes or m<sup>3</sup>
2. 200,000 – 400,000 tonnes or m<sup>3</sup>
3. 400,000 – 600,000 tonnes or m<sup>3</sup>
4. 600,000 – 800,000 tonnes or m<sup>3</sup>
5. 800,000 – 1,000,000 tonnes or m<sup>3</sup>
6. >1,000, 000 tonnes or m<sup>3</sup>

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

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

NB: Percentage values to be calculated as rounded-up integers.

## 2.5.2 Bimatra administration and flow control

There is an implemented system to calculate outputs as specified in the Internal SBP Handbook. Control systems are direct transfers through the trading activity and transport documents. Such can be extracted from the bookkeeping and administrative system. The above figures are a result of that.

## 2.5.3 The use of other standards.

**Standard number 2** is complied with in the following way:

- A supply base is set (found in this document)
- Determination of origin is secured by the implemented Feedstock checklists, see elsewhere in this document.
- A Supply Base Report can be summarized from this document.
- A Supply Base Evaluation is carried out.
- Sub-scopes were defined but not relevant (see elsewhere in this document).
- Risk assessment is done.
- And the remaining things from standard 2 can be found in this document as well: competence check, stakeholders, SVP, management system (annex 2), mitigation, SBE interval, reporting and credibility, comments and complains (annex 2).

With regards to **standard number 4**, COC requirements, the following can be extracted from the administration of Bimatra:

### Input invoices and system

- Invoice reference for every truckload. Invoices and truckloads can be linked.
- Transport document with every truckload. This follows Belgium legislation and EUTR requirements. It means that species, tonnes, names, supplier etc are all mentioned.
- Physical properties, can be found at the transport document.
- Volume of each truckload, at the transport document.
- Supplier of each truckload, at the transport document and on invoice.
- Date of transport (and invoice date on invoice).
- Certification number or claim (on invoice, when applicable).

### Output invoices and system

- With regards to the output a normal invoice is send that includes everything; name, date, address, SBP claim (when needed), description of products sold (species) and volumes.

With regards to the COC procedures we refer to the existing FSC and PEFC COC procedures, which are also used for SBP.

**Standard number 5** is also complied with. Bimatra does only produced and sells woodchips. Fuel for machines and travel distances (haulage) in KM have to be recorded. Trucks are the only means of transport with Bimatra. The SAR document also have to be filled in.

- Such data can be calculated from the administration as every transport document is backed up by a loading and unloading location. KM can be calculated automatically. Fuel consumption can also be recorded.

### 2.5.4 Physical separation.

Physical separation is not needed as trucks are directly delivered at the harbour..

### 3 Requirement for a Supply Base Evaluation

SBE completed	SBE not completed
√	<input type="checkbox"/>

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

## 4 Supply Base Evaluation

### 4.1 Scope

The scope of the evaluation covered the entire supply base of the company from which is considered the following feedstock:

A	B	C	D	E	F	G	M
#	Feedstock type for biomass production	Origin	Physical Description	Country of harvest (new row for each country)	Raw mass as received in metric tonnes	Moisture % as received (weighted average, single figure) <sup>2</sup>	Specify any pre-processing. (chipping, drying, none)
1	Thinning from (semi-)natural forests	Residues without stumps (e.g. branches and tops)	Chips	Belgium	0-200.000	45	chipping
2	Final harvest from plantations	Residues without stumps (e.g. branches and tops)	Chips	Belgium	0-200.000	45	chipping

The purpose of SBE is to distinguish the risk level in relation to the indicators described in SBP Standard 1 and further guidelines.

All SBP biomass is processed by professionals who have assessed the work areas in accordance with the management system described in the **Contractor's Manual** and the **Bimatra SBP management manual**. See annex to this report.

### 4.2 Justification

This evaluation is based on the [Centralized National Risk Assessment \(CNRA\) for Belgium](#) published in May 2017 which is available from FSC. The CNRA was completed in accordance with SBP Standard no. 1 and the evaluation was completed in accordance with SBP standard no. 2.

All items in Annex 1 have been answered and the risks have been assessed in connection with the preparation of the CNRA. Information has been gathered from applicable Belgian legislation, instructions and interviews with the relevant persons. Based on the recommendations in the CNRA for measures to reduce the risk and analyse the company's procedures, useful measures to reduce the risk have been found to ensure a low risk for all indicators in connection with the production of the feedstock. Bimatra is aware of the fact that changes in the CNRA may occur and is willing to adapt the SBE if this should happen.

## 4.3 Results of Risk Assessment

The Risk Assessment concludes that the risk is low in relation to all criteria,.

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

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

It was decided that dividing into sub-scopes is not needed.

## 4.4 Results of Supplier Verification Programme

As described in section 8, Bimatra has no need for a full supplier verification programme. Instead measures are taken to recognize and act on the presence of any HCV when found in the field, on a voluntary basis (due care).

### Conclusion

When reviewing and revising the procedures of Bimatra based on the CNRA, it is estimated that the company ensures that the biomass complies with the SBP certification. All categories (except one) of the RA are low risk (while all CNRA categories are low risk).

Bart De Clerck who handles job planning, identification of key biotopes and project mapping, has a wide experience in working in the forest and making considerations for nature worth conserving.

The company is aware of the fact that if jobs have to be carried out in areas with a specific risk (when they pop up locally, on a small scale, in the future, even when the CNRA says low risk for the whole country), it may be necessary to have other qualified persons, such as biologists or foresters, help with the identification of key biotopes, cultural values or any other important issues as explained in the 5 main categories of the CNRA.

The procedures are such that Bimatra staff is able to identify such risks on a local level, and is able to respond in a professional way.

## 5 Supply Base Evaluation Process

Bimatra has contracted the [Forestry Service Group](#) to assist with the SBE. They are also working with FSC international to compile CNRA 's for many countries around the world, including Belgium. They have 25 years of experience in this type of work.

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

As it appears from the CNRA, a low risk has been identified for all 5 main categories and all 32 underlying indicators.

The CNRA for Belgium was used as the backbone of this document.

## 6 Stakeholder Consultation

In principle the CNRA had its own consultation rounds and feedback was received and used to compile the final version of the CNRA. Nevertheless this is not completely the same as SBP and the SBE. Therefore an additional consultation round was organized. This in line with 'Instruction Note 2B: Supply Base Evaluation Stakeholder Consultation Requirements' (annex to the 2<sup>nd</sup> standard).

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

### BIMATRA STAKEHOLDER LIST

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

Research Institute	INBO	Brussels	info@inbo.be	Interested
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## 6.1 Response to stakeholder comments

No response were received at the end of the consultation period.

## 7 Overview of Initial Assessment of Risk

Table 1. Overview of results from the risk assessment of all Indicators (prior to SVP). As there are no further sub-scopes this is applicable for the entire supply base.

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

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

Based on the CNRA, Bimatra has concluded that there is a low risk for both feedstocks.

## 8 Supplier Verification Programme

### 8.1 Description of the Supplier Verification Programme

Following the 2<sup>nd</sup> standard, chapter 14, a SVP is required under the following conditions:

14.1 The purpose of the SVP is to assign a risk level to those indicators where the RA was inconclusive (i.e. for indicators initially rated as unspecified risk).

14.2 The SVP might include field based assessments of indicators (for example, audit of the BP's feedstock suppliers).

14.3 The purpose, extent and nature of any SVP evaluation and the associated mitigation measures shall be documented.

14.4 More detailed requirements for SVP evaluation are given in Instruction Note 2A. Supplier Verification Programme – Requirements for Biomass Producers. Such could include: A sampling plan for assessing forest operations within the Supply Base, Records of those assessments, Contractual requirements with suppliers, Mechanisms to rank performance and development of a list of “approved suppliers” and Monitoring and updating this information.

The RA (the CNRA for Belgium) does not list any indicators with a specified risk. Therefore a SVP is not needed.

### 8.2 Site visits

NA

### 8.3 Conclusions from the Supplier Verification Programme

NA

## 9 Mitigation Measures

### 9.1 Mitigation measures

Bimatra is working according to the procedures of the Contractor's Manual, which is laid out to consider the indicators described in the CNRA. The Contractor's Manual describes how to identify a specific risk in the field and what to do when encountered. After judgement measures to reduce the risk should be taken before the feedstock can be called SBP compliant. If Bimatra is not able to reduce the risk for parts of the biomass, it will not form part of the SBP quantity. Projects in Bimatra are planned, assigned and controlled by Bart De Clerck. As the Risk Assessment shows low risk for all indicators there is no strict need for mitigation measures or a risk assessment. Nevertheless Bimatra shows their commitment with the 'due care' procedure below. The following procedures take place with all field work:

1. The risk is identified in the field, according to instruction in the Contractor's Manual.
2. Any field work will stop and Bimatra main office is contacted.
3. The risk is recorded in a special database, maintained by Bimatra. Data, place (with map) and risk (following CNRA categories) is recorded.
4. One of 2 actions can then occur:
  - a. The area/site in question will not be taken into account as SBP feedstock.
  - b. The site will be taken into account for SBP and a mitigation action is proposed. If risk cannot be brought to 'Low' then the source shall be avoided and feedstock physically excluded from SBP-certified biomass. When required Bimatra will hire specific experts to help judging and solving the risk.
5. Mitigation actions and direct results are also recorded in the same database as above. When the site is not taken into account such is also recorded.
6. For every 10<sup>th</sup> case per year monitoring will take place, within 12 months after finding. Results of the monitoring are included in the database mentioned above with evidence (pictures, measurements etc).

### 9.2 Monitoring and outcomes

As explained above mitigation measures are monitored every 12 months, if any. Larger SBP indicators will only be monitored when a new version of the CNRA is published (not foreseen) and after external audits of the certification body. Besides this it could be needed that Bimatra systems and procedures are adjusted. Such could be the result of above due care risk assessments. When unexpected risks are found this might lead to changes in the system and procedures. In annex 2 such are recorded and proposed.

## 10 Detailed Findings for Indicators

Detailed findings for each Indicator are given in Annex 1.

## 11 Review of Report

### 11.1 Peer review

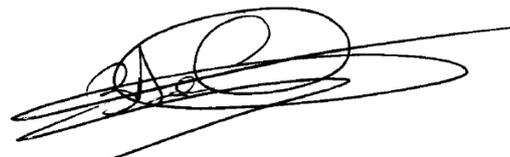
The [Forestry Service Group](#), Mr Marco Bijl, compiled this SBE document and is also responsible for peer reviewing. They are an independent consultancy company.

Besides this Simona Ferutta was assessing the document. She is the leading expert in Italy & Spain with regards to SBP certification. She is a consultant for Duferco, Italy which is a company also working on SBP certification.

### 11.2 Public or additional reviews

NA

## 12 Approval of Report

Approval of Supply Base Report by senior management			
Report Prepared by:	<p><b>Marco Bijl</b></p> 	<p><b>Director FSG</b></p>	<p><b>30-9-2019</b></p>
	Name	Title	Date
<p>The undersigned persons confirm that I/we are members of the organisation's senior management and do hereby affirm that the contents of this evaluation report were duly acknowledged by senior management as being accurate prior to approval and finalisation of the report.</p>			
Report approved by:	<p><b>Bart de Clerck</b></p> 	<p><b>Director Bimatra</b></p>	<p><b>30-9-2019</b></p>
	Name	Title	Date

## 13 Updates

Once a year prior to the external audit, Bimatra will carry out self-regulatory evaluation according to the procedure described in the **Contractor’s Manual** & the **Bimatra SBP management manual**. The self regulatory control will assess:

1. **Changes in the supply base.** If changes have occurred which call for changes to elements of the Supply Base Report. All relevant **databases** will then be changed accordingly.
2. **Mitigation measures** that are executed. Each year every 10<sup>th</sup> case will be re-assessed within 12 months after occurring.
3. It will be checked if a **new CNRA** is published. If so the Risk Assessment will be re-assessed.\
4. A **self-evaluation will take place with regards to the management**. Such is explained in the Bimatra SBP management manual.
5. The **Contractor’s Manual** is re-assessed and when required updated.
6. **Supply base data** and all relevant databases are completed, closed and stored.

Reports are not yet applicable.

### 13.1 Significant changes in the Supply Base

NA

### 13.2 Effectiveness of previous mitigation measures

NA

### 13.3 New risk ratings and mitigation measures

NA

### 13.4 Actual figures for feedstock over the previous 12 months

Reporting period: the previous 12 month period (Dec 2018-Nov 2019).

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

Not certified to an SBP-approved Forest Management Scheme	
List all species in primary feedstock, including scientific name	See table under 2.1
Volume of primary feedstock from primary forest	0% (no primary forests remains in Belgium)
List percentage of primary feedstock from primary forest	NA
<b>Volume of secondary feedstock:</b>	NA
Volume of tertiary feedstock:	NA

## 13.5 Projected figures for feedstock over the next 12 months

These will be similar to last year. Although Bimatra is intending to chip more material with their own machines (still to buy). This could lead to a shift from secondary to primary feedstock.

# Annex 1: Detailed Findings for Supply Base Evaluation Indicators

See separate document.

## Annex 2: SBP Bimatra Management Manual (BMM)

Vs 1.0 July 2019

### 1. Scope of the document.

The Bimatra Management Manual (BMM) is the key document to all procedures with regards to SBP certification.

### 2. Version number and updating.

Once a year the BMM is re-assessed and when required updated. The version number will then see the next number in line.

### 3. Responsible persons.

Mr Bart De Clerck, Bimatra, is responsible for maintaining this document and the overall SBP implementation. Other responsible persons are:

Name	Task
<b>Own staff (list all)</b>	
Nobody else at the moment.	
<b>Hired staff or subcontractors, or experts</b>	
Nobody else at the moment.	

### 4: Management review

To be able to comply with Standard 2, (chapter 15) an annual management review is required. The owner-manager of Bimatra has to approve the annual review. The following will need to be filled in:

Focusing on sustainable sourcing solutions

Year:		
Item checked	Remarks or adjustment made, if any	When implemented and what document changed.
<p><b>The SBE document</b> (this document) is re-assessed and when required updated.</p>		
<p>The <b>Contractor's Manual/ format of contracts and its annexes</b> is re-assessed and when required updated.</p>		
<p><b>Bimatra Management Manual</b> (this document) is re-assessed and when required updated.</p>		
<p><b>Substantial Changes in the supply base.</b> If changes have occurred which call for changes to elements of the Supply Base Report. All relevant <b>databases</b> will then be changed accordingly.</p>		
<p><b>Mitigation measures</b> that are executed. Each year every 10<sup>th</sup> case will be re-assessed within 12 months after occurring. See chapter 9 of this document for procedures).</p>	<p>At the moment this is NA.</p>	
<p>It will be checked if a <b>new CNRA</b> is published. If so the Risk Assessment will be re-assessed. The same counts when internal risk assessment show that a change in procedure is needed in the Bimatra documents.</p>		
<p><b>Purchase and sales documents are reviewed</b> (again, to double check) for compliance with SBP.</p>		

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<b>Verification of SBP and PEFC certificates</b> and other SBP claims should be verified as well (when not done so earlier).		
<b>Relevant employees are informed</b> about the changes made. List time and date of additional meeting/training.		

### 5. Training & information

Training of staff records are updated. Such courses are filled in, into a database where, time, place, topic and participants are registered. Powerpoints and signature lists are to kept. The below table can be used:

Training topic	Date	place	# of participants
SBP certification in general	18 <sup>th</sup> of Nov 2019	Ingelmunster	5, signature list available
Information send to all suppliers	Done with every contract from now on	Ingelmunster	All suppliers

### 6. Risk identification and procedures & monitoring

This table is **combining** all identified risk in the last year. The summary of such identified risk is reported below.

Related transport document (if applicable)	Location (google maps location)	Date identified	Risk identified	Group (1-6)	Project site located in protected area or Natura2000 site? <b>Yes/no</b>	Action taken: work stopped or not. <b>Yes/no.</b>	Evidence available (pictures, maps)	Mitigation action taken (explain what has been done)	Site/area take into account of Supply Base? <b>Yes/no?</b>	Monitoring done within 12 months or not. <b>Yes/no.</b>	Date and results of monitoring (provide evidence)

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### 7. Supply base data (last 12 months and forecast next 12 months), Determination of origin and other data.

**Last 12 months:** Such is collected in the **Bimatra administration**. A summary is given here:

A	B	C	D	E	F	G	M
#	Feedstock type for biomass production	Origin	Physical Description	Country of harvest (new row for each country)	Raw mass as received in metric tonnes	Moisture % as received  (weighted average, single figure) <sup>2</sup>	Specify any pre-processing. (chipping, drying, none)
1	Thinning from (semi-)natural forests	Residues without stumps (e.g. branches and tops)	Chips	Belgium		45	chipping
2	Final harvest from plantations	Residues without stumps (e.g. branches and tops)	Chips	Belgium		45	chipping

#### Summary:

Total volume of Feedstock: tonnes or m3 -	
Volume of <b>primary feedstock</b> : tonnes	
List percentage of primary feedstock	

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Certified to an SBP-approved Forest Management Scheme	
Not certified to an SBP-approved Forest Management Scheme	
List all species in primary feedstock, including scientific name	
Volume of primary feedstock from primary forest	
List percentage of primary feedstock from primary forest	
<b>Volume of secondary feedstock:</b>	
Volume of tertiary feedstock:	

### Forecast next 12 months:

Total volume of Feedstock: tonnes or m3 -	
Volume of <b>primary feedstock</b> : tonnes	
List percentage of primary feedstock	
Certified to an SBP-approved Forest Management Scheme	
Not certified to an SBP-approved Forest Management Scheme	
List all species in primary feedstock, including scientific name	
Volume of primary feedstock from primary forest	
List percentage of primary feedstock from primary forest	
<b>Volume of secondary feedstock:</b>	
Volume of tertiary feedstock:	

### List of feedstock suppliers last year

Names...	

GHG data: number of haulage KM in total over de last year (trucks)(standard 5); **BUT ONLY FOR SBP biomass. When more than 1 customer this should be separated by customer. See also SAR document.**

Year	Number of KM	Customer
------	--------------	----------

2019		

**8. Physical separation.**

Optional for 2020 (after new audit): If it proves that biomass is bought or traded that cannot enter the SB chain this biomass has to be physically separated from the SB biomass in the warehouse. It must be possible to calculate from the databases that the amount of SB and non-SB material equals the numbers in the databases.

**9. Comments or complaints.**

Collect any comments or complains about SBP, the SBE or else in the table below, each year.

Date	Name of person/organisation	Comment or Complain	How solved?	Deadline before which complaints have to be addressed and solved.

Bimatra shall inform SBP of any substantiated complaints within 30 days of the completion of the BP's analysis of the complaint. See also standard number 2 (section 20).

**10. Trademark use.**

Bimatra will follow the applicable Trademark user guidelines. In all cases where the logo and claims in text are used a formal approval will be requested from the SBP office.

## Annex 3: Bimatra Contractor's 'Manual'

Vs 1.0 July 2019

Bimatra is certified for Biomass according to the Sustainable Biomass Program (SBP). To be able to stay certified a few requirements are implemented. Suppliers, contractors and landowners working with Bimatra should comply with these requirements to be able to sell to Bimatra. The requirements are listed and added to the suppliers contracts (together they will form the 'contractors *manual*'). The following topics and documents will be explained and included to each contract:

Such requirements are the following:

- Standard Contracts are used. Template for a contract can be found in [annex 4](#).
- Anti-corruption statement forwarded and acknowledged by each supplier. [Annex 5](#).
- Checklist filled in with **every** job. A job usually is an agreed geographical location. Like a specific piece of forest, or 1 KM of trees along a road. Include a proper description. Such will be done by Bimatra, but assistance might be required from the supplier. [Annex 6](#).
- Risk assessment carried out when applicable, and how to do that. [Annex 7](#)
- SBP Training course followed or informed in other ways what SBP means. A special info page is added to each contract to explain SBP (available as a separate document).

## Annex 4: Template for contract with suppliers

See separate document.

# Annex 5: Anti-corruption protocol (to be send with contracts to each contractor)(French/English).

## Politique anti-corruption

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Version: 1.0  
Date: 21 mai 2019

### 0. Introduction

Dans son activité, BIMATRA sprl (Bimatra) se concentre sur le développement commercial à long terme, la stabilité et la réduction des risques, l'utilisation durable des ressources naturelles et le respect des employés, des partenaires commerciaux et des parties prenantes.

### 1. Politique anticorruption

Bimatra demande à ses partenaires (par exemple, sous-traitants et fournisseurs) de se conformer à cette politique. Bimatra interdit la corruption des fonctionnaires et le versement de pots-de-vin ou de pots-de-vin de toutes sortes, qu'il s'agisse de contacts avec des fonctionnaires ou de particuliers du secteur privé. Aucun représentant de Bimatra ne doit payer ou offrir de verser un pot-de-vin ou de fournir une autre chose, de valeur pour l'obtention d'un avantage indu, à un tiers, public ou privé, avec lequel Bimatra a des relations commerciales. 2. Respect des lois anti-corruption Chaque représentant de Bimatra doit se conformer à des normes éthiques élevées et se conformer à toutes les lois anti-corruption applicables. Aucun représentant de Bimatra ne doit, directement ou indirectement, promettre, autoriser, offrir ou payer quoi que ce soit de valeur (y compris, sans toutefois s'y limiter, cadeaux, voyages, invitations, dons de charité ou emplois) à un responsable gouvernemental ou à une autre partie pour influencer indûment tout acte ou décision d'un tel fonctionnaire dans le but de promouvoir les intérêts commerciaux de Bimatra de quelque manière que ce soit, ou de promouvoir autrement de manière inappropriée les intérêts commerciaux de Bimatra de quelque façon que ce soit. "Fonctionnaire du gouvernement" est défini ci-dessous.

- "*Fonctionnaire du gouvernement*" désigne tout ce qui suit: (1) tout employé d'une entité gouvernementale ou d'une sous-division du gouvernement, y compris les représentants élus; (2) toute personne privée agissant pour le compte d'une entité gouvernementale, même à titre temporaire; (3) les dirigeants et les employés de sociétés détenues ou contrôlées par le gouvernement; (4) candidats à des fonctions politiques; (5)

responsables de partis politiques; et (6) des responsables, employés et représentants d'organisations internationales publiques, telles que la Banque mondiale et les Nations Unies.

### **3. Il est interdit de fournir des voyages gouvernementaux pour le compte de Bimatra.**

Il est interdit aux représentants de payer des dépenses de voyage, d'hébergement, de cadeaux, d'hospitalité ou de contributions caritatives pour des représentants du gouvernement au nom de Bimatra. Le représentant reconnaît également qu'il est interdit d'utiliser les fonds fournis par Bimatra pour payer les frais de déplacement, d'hébergement, de cadeaux, d'hospitalité ou de contributions caritatives de fonctionnaires.

### **4. Mesures anticorruption**

Bimatra prend les mesures suivantes pour prévenir la corruption et les activités illégales liées à ses activités:

- Le système Bimatra Due Diligence assure la vérification de la propriété et du respect des obligations légales par les fournisseurs de matières premières;
- Bimatra ne paye pas en espèces et la facturation est obligatoire dans tout type de relation financière avec les fournisseurs ou d'autres parties;
- Tout événement hautement plausible ou prouvé de pratiques de corruption entraînera la rupture des relations avec les personnes impliquées et les activités commerciales avec les sociétés qu'elles représentent seront réexaminées.
- Toute forme de corruption avérée, de corruption ou d'activités illégales ne sont pas tolérées et sont signalées aux autorités.

### **5. Pas de représailles**

Bimatra ne tolérera aucune mesure de représailles à l'encontre de quiconque aurait, de bonne foi, signalé une violation éventuelle de la présente politique ou refusé de participer à des activités qui enfreignent cette politique.

## Anti-corruption Policy

Version: 1.0  
Date: 21 May 2019

### 0. Introduction

In its business activity BIMATRA bvba (Bimatra) focuses on long-term business development, stability and risk reduction, the sustainable use of natural resources, and respect for employees, business partners, and stakeholders.

### 1. Anticorruption policy

Bimatra requires its partners (for example, subcontractors and suppliers) to comply with this Policy.

Bimatra prohibits corruption of government officials and the payments of bribes or kickbacks of any kind, whether in dealings with public officials or individuals in the private sector.

No Bimatra representative shall pay or offer to pay a bribe or provide another thing of value for obtaining an improper benefit, to any third party, public or private, with whom Bimatra is doing business.

### 2. Compliance with Anti-Corruption Laws

Each Bimatra representative shall conduct itself with high ethical standards and comply with all applicable anti-corruption laws. No Bimatra representative shall, directly or indirectly, promise, authorize, offer or pay anything of value (including but not limited to gifts, travel, hospitality, charitable donations or employment) to any government official or other party to improperly influence any act or decision of such official for the purpose of promoting the business interests of Bimatra in any respect, or to otherwise improperly promote the business interests of Bimatra in any respect. "Government Official" is defined below.

"Government Official" refers to all of the following: (1) any employee of a government entity or subdivision, including elected officials; (2) any private person acting on behalf of a government entity, even if just temporarily; (3) officers and employees of companies that are owned or controlled by the government; (4) candidates for political office; (5) political party officials; and (6) officers, employees and representatives of public international organizations, such as the World Bank and United Nations.

### 3. Providing Government Travel on behalf of Bimatra is prohibited

Representatives are prohibited from paying expenses for travel, lodging, gifts, hospitality, or charitable contributions for government officials on behalf of Bimatra. Representative also acknowledges that it is prohibited from using any funds provided by Bimatra to pay expenses for travel, lodging, gifts, hospitality or charitable contributions for government officials.

#### **4. Anticorruption measures**

Bimatra undertakes the following measures to prevent corruption and illegal activities related to it's business:

- Bimatra Due Diligence system ensures verification of the feedstock suppliers for the ownership and fulfilment of legal obligations;
- Bimatra does not do payments in cash and invoicing is obligatory in any kind of financial relationship with suppliers or other parties;
- Any highly plausible or proven event of corrupt practises will result in the termination of relations with the people involved, and business activities with the companies they represent will be reconsidered.
- Any kind of proven corruption, bribery or illegal activities are not tolerated and is reported to the authorities.

#### **5. No Retaliation**

Bimatra will not tolerate retaliation against anyone who has, in good faith, reported a possible violation of this Policy or refused to participate in activities that violate this Policy.

## Annex 6: Feedstock Checklist

See separate document

## Annex 7: Risk assessment

### **1. How to assess when a risk-assessment is needed in the field? (added to suppliers contracts)**

Working on SBP means taking care of the environment. In principle such is also arranged by the law in Belgium. Nevertheless we list the points to look for and to take care in the field. **IF ANY OF THESE POINTS CANNOT BE GUARANTEED → Risk Assessment might be needed.**

#### **Operating machines**

- Avoid damage to the trees that will remain in the harvest location.
- Clean the roads after (or in between jobs, at night) to avoid accidents.
- Clean the waterways of any remaining trees and branches.  
Remove any dangerous leaning or damaged trees at the sides of roads/canals.
- Use the shortest possible route from the tree to the road.
- Preferably do NOT trail logs in the forests with cables (winch). This will damage the soils.
- Use the most efficient tires or tracks to avoid soil erosion.
- Do not light fires. Branches and waste will never be burned.
- Do not cross waterways inside the forest without culverts (duikers).
- In many cases you cannot harvest close to waterways, only with special permits. Check permit.
- You cannot operate when the ground is saturated with water, because no furrows must be created by the vehicles.

#### **About flora and fauna**

- All active nests, dens (burcht) and burrows (hol) must be respected during the harvesting. Harvesting cannot take place around such an area. Bufferzone is minimum 10 meters around each location.
- Always leave part of the remaining branches inside the woodland, only in areas where there are no small plants you may remove a bit less to guarantee enough light on the ground.
- Respect larger puddles of water (>2 meter diameter) from February to March (to avoid damage to eggs of amphibians).
- Do not leave waste of any kind in the woods.
- Do not clean machines in the woods.

#### **Inspections**

- Follow the directions of the inspecting governmental officers.

**If you cannot guarantee one or more of the above → the following procedure takes place:**

**2.Procedure what to do in case a risk is identified? In that case the following procedure takes place:**

The risk is identified in the office(mostly because it's a protected site, but maybe because of other reasons)	Bimatra office
Any field work will stop by Bimatra through a Stop-Working Order (SWO).	
A first decision is made if work can continue or not. In case of doubt see the following.	
A further risk assessment takes place in the field, see the Risk assessment form. Form is filled in.	In the field
Bimatra is studying the risk report and one of 3 actions can then occur:	Bimatra office
a. The area/site in question will not be taken into account as SBP feedstock. <i>Work will stop, or material is not longer SBP</i>	
b. The site will be taken into account for SBP and a mitigation action is proposed. If risk cannot be brought to 'Low' then the source shall be avoided and feedstock physically excluded from SBP-certified biomass. When required Bimatra will hire specific experts to help judging and solving the risk. <i>Work will continue or stop depending on the action taken (CWO or SWO).</i>	
c. The risk is there but it is highly unlikely that any damage will occur because of the work in the field. <i>Work will continue (CWO).</i>	
Bimatra communicate the actions to the people in the field. <b>Either the work continues or not (CWO or SWO).</b>	Bimatra office/Field

*For examples of the CWO and SWO see separate documents.*

### 3.Risk assessment form

<b>To be filled in by contractor or employee in the field</b>				
<b>Date of assessment:</b>				
<b>Name of Employee:</b>				
<b>Related work order number:</b>				
	<b>Group</b>	<b>How to recognize the risk?</b>	<b>What is found</b>	<b>Advise?</b>
1	Species diversity	You will find species that are endangered. Like nesting birds that should not be disturbed (roofvogels). Or a otter, bever or das nests that should be left alone.		
2	Landscape level ecosystems and mosaics	This is only applicable in case of large scale deforestation (more then 10 ha). Probably never the case.		
3	Ecosystems and habitats	If you sense that you are about to destroy a complete habitat for birds, butterflies etc you might stop the work. Please note that some butterflies and small birds can have very small habitats (maybe up to 100 m2).		
4	Critical ecosystem services	This s about the following topics: a) <i>Forests acting as protection against erosion and flooding.</i> If you think that, by removing vegetation, we might end up with erosion or flooding (on steep slopes or around streams and rivers) you should stop the work. b) <i>Forests acting as barriers for destructive fire.</i> If you think that, because of the removal of vegetation, we can have a larger risk on forests fires you should stop the work. c) <i>Forests acting as clean drinking water catchments and protection of water quality.</i> If you are working in water cathment areas you should follow the regulations. But if you are removing vegetation around streams, rivers, lakes and ponds you should also take this into account.		
5	Community needs	When you are about to remove vegetation but this is actually very important for a local community, farmers etc then you should think twice. Certainly when there is no official regulation in place. This can be the case when such vegetation is used as a supply of firewood, mushrooms, berries and fruits, recreational site etc etc.		

## Focusing on sustainable sourcing solutions

6	Cultural values	This is about cultural sites found in forests (such as archaeological sites, monuments, crosses, graves, rare trees etc) or sites which are important for a community's traditional cultural identity. When you come across these and you have no instructions what to do, stop the work.		
<b>Your conclusion: can the work continue or not? Explain:</b>				
<b>If not continue; is there a way to overcome the risk (mitigation)?</b>				
<b>To be filled in by Bimatra at office</b>				
<b>Conclusion by Bimatra (explain):</b>		<input type="checkbox"/> Continue <input type="checkbox"/> stop <input type="checkbox"/> mitigation action; explain action.....		
<b>Risk assessment selected for further monitoring?*</b>		<input type="checkbox"/> Yes <input type="checkbox"/> No		

For every 10<sup>th</sup> case per year monitoring will take place, within 12 months after finding. Results of the monitoring are included in the database mentioned above with evidence (pictures, measurements etc).

## Annex 8: No longer included

## Annex 9: Stakeholder letter.

Dear valued stakeholder,

BIMATRA bvba, a woodchips producer in Ingelmuster - Belgium, working in line with international standards, hereby gives notice of the opening of its SBP stakeholder consultation process, regarding its SBP Supply Base Report and SBP Supply Base Evaluation.

Please find both our reports at our web page: <https://www.bimatra.be/nl/certificaten>

This consultation round **closes xxx 2019**. We kindly request you to send you comments and concerns before xxx **2019**, if possible.

We hope to involve you as a stakeholder, in order to evolve together in this competitive market, on which we would like that only best practices in forest management were used.

Please feel free to call or write to:

Bart De Clerck, phone number: +32 (0) 56662871,

email: [bart@bimatra.be](mailto:bart@bimatra.be)

to discuss the issue. However, we kindly ask you to submit comments in writing (by e-mail or regular post) to officially enter the consultation process.

Best regards,

Bart De Clerck

## Annex 10: Chain of Custody procedures.

The Chain of Custody procedure (standard number 4) is based on two documents:

1. The *Procedure handboek pefc™ chain of custody* (Procedure manual book PEFC). This list a full and detailed procedure, each time mentioning the documents or systems related. The document is not repeated here. See the separate document.
2. The Feedstock form. This form is specially designed for SBP (annex 6, as a separate document).

The 2 documents together will form a full Chain of Custody procedure.

### **Special procedure about SBP compliance biomass (buying with PEFC, FSC or SBP certificate):**

In case this feedstock is applicable, when buying from a suppliers that supplies FSC, PEFC or SBP material, the following procedure is applicable:

1. The contract should state that, with the invoice, a certificate of origin is added. This certificate should include a list of locations (not especially the name of landowners) where the material was coming from. The supplier is obliged to collect this anyway, so he/she should be able to provide it.
2. The invoice should include this certificate of origin.

### **What happens when such a certificate of origin cannot be provided?**

Then the material is not eligible for SBP certification.