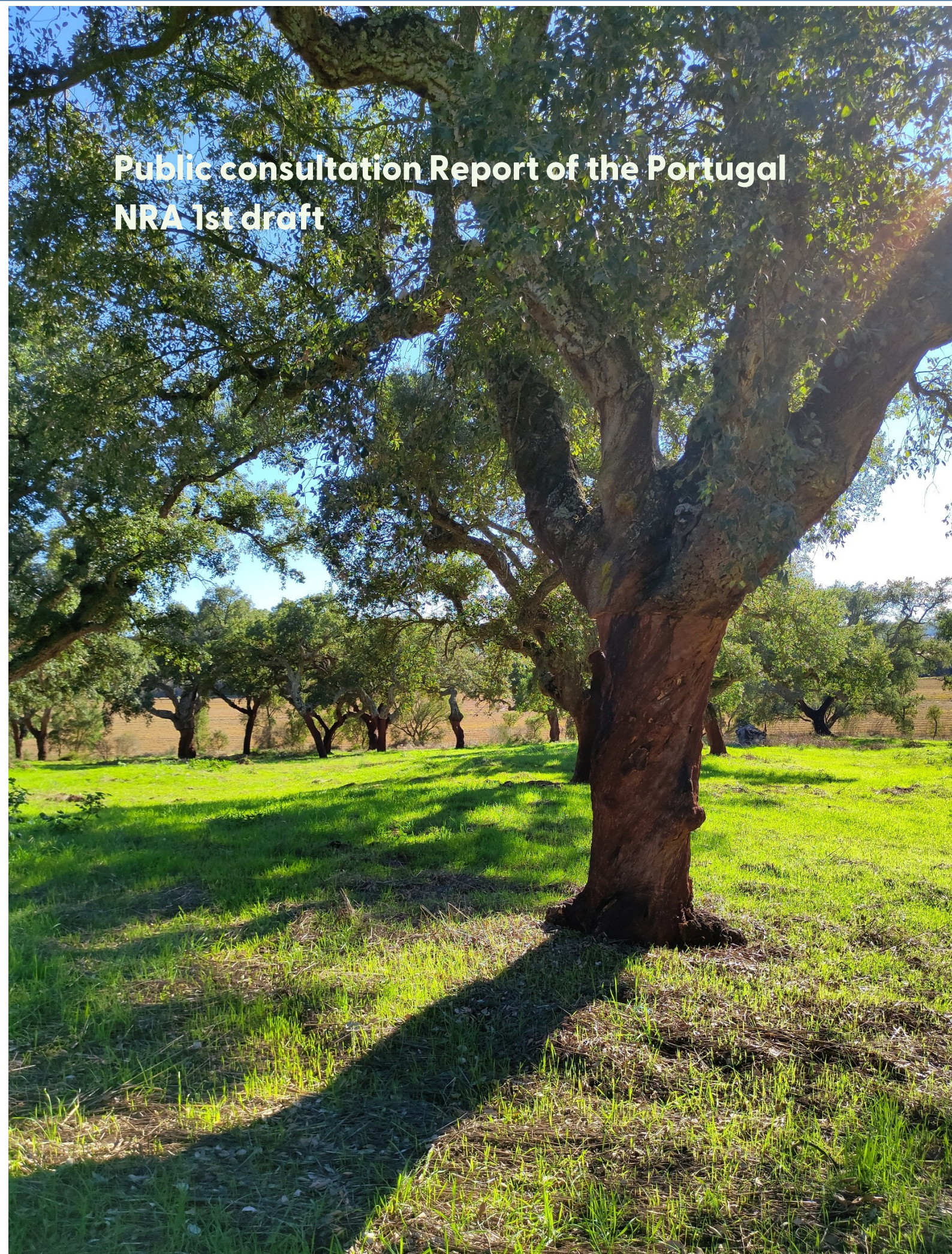


Public consultation Report of the Portugal NRA 1st draft



Revision Process

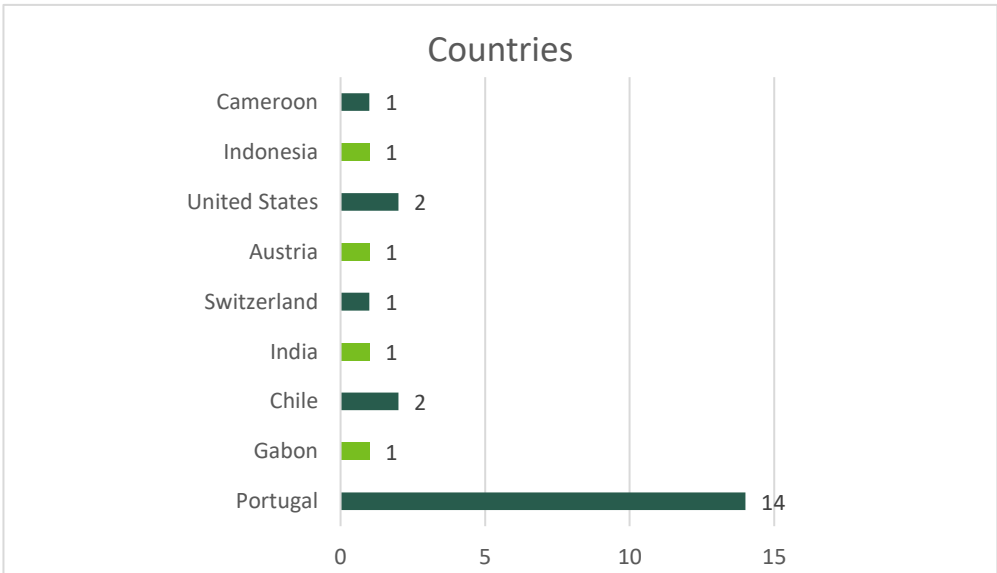
The Portuguese NRA is being revised according to the Procedure FSC-PRO-60-006b V2-0 Risk Assessment Framework. It is a major process meaning that is being developed by the Portuguese Standard Development Group.

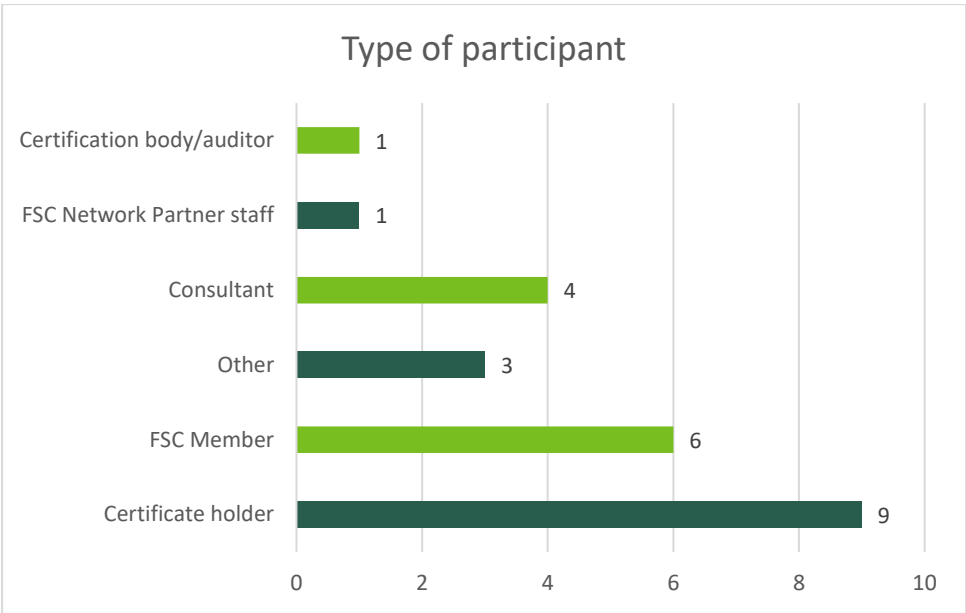
This revision work in Portugal takes place within the scope of TC 145 – Technical Commission for the Standardisation of Sustainable Forest Management, more specifically in Sub-commission 7 dedicated to Controlled Wood. This involvement in the TC guarantees the inclusion of a greater number of interested parties, the promotion of greater involvement with regulatory bodies and facilitating access to technical experts whenever necessary. The assessment of the 64 indicators was made within the TC145 scope of work and then validated by the SDG.

The 1st draft was under public consultation from 02 June until 31 July 2025 in the FSC Consultation Platform.

Summary of participation in the 1st public consultation

There was a total of 24 participants, from different countries, where 23 participated through the consultation platform and one entity sent their comments by email to the process lead. In the next graphics we can see the Type of participants, country and membership. Comments were received in English, Spanish and Portuguese. The Portuguese comments were translated into English.





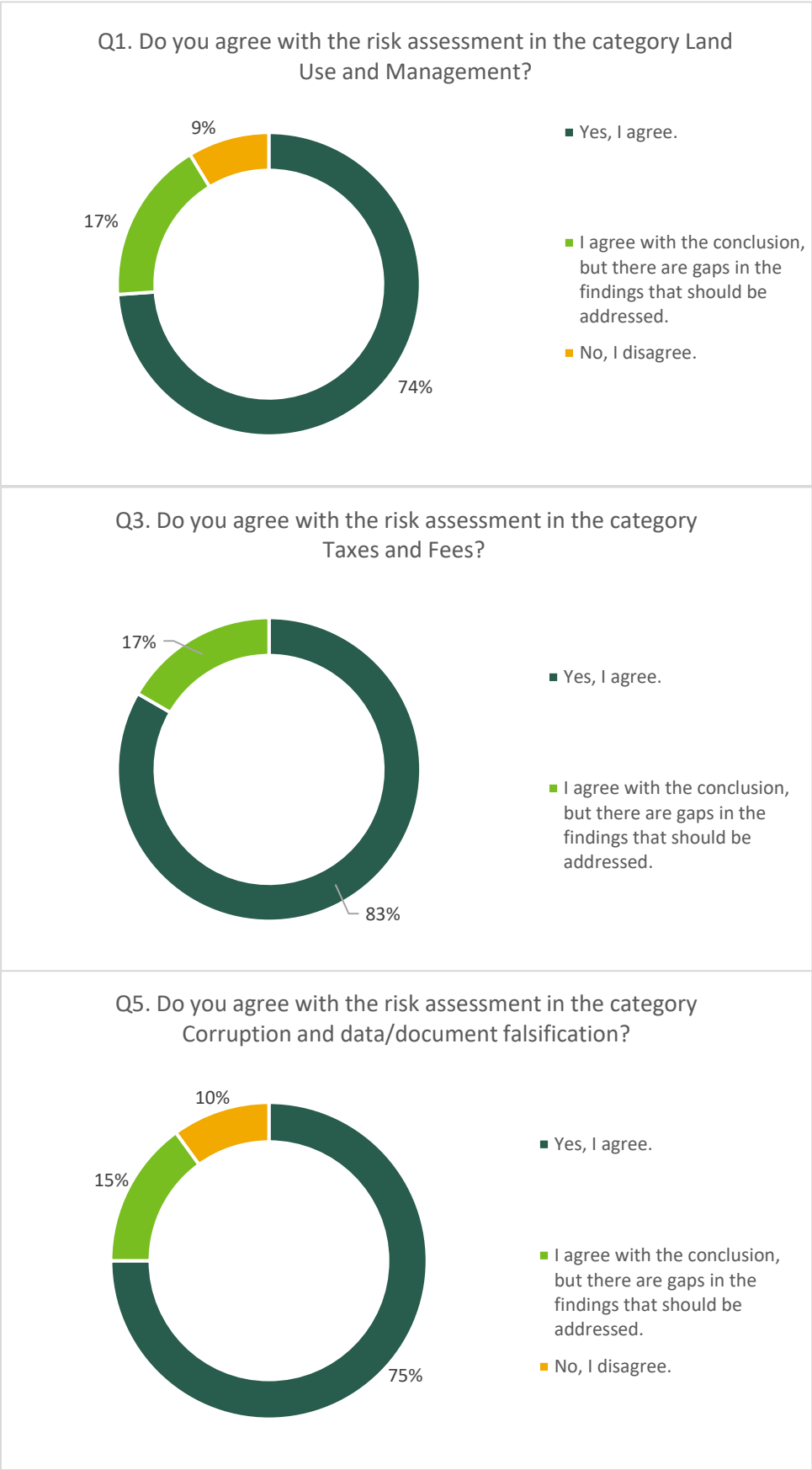
The majority of the participants were from Portugal, and the certificate holders was the type of participant that more contributed to the consultation.

Answers by Category

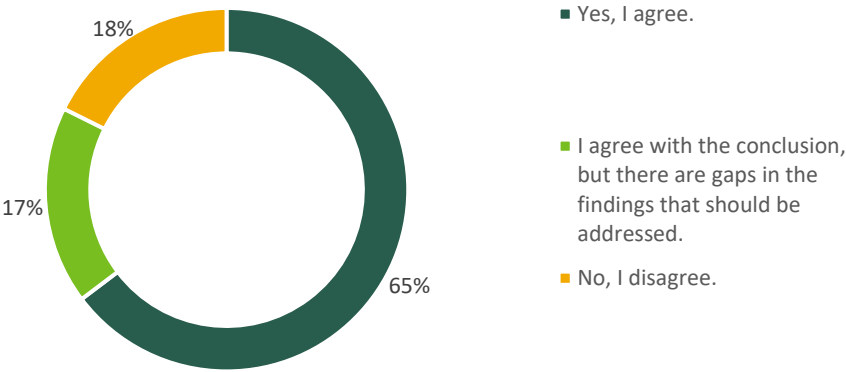
The consultation was organized with the different Categories of the 64 indicators, and there was also a part dedicated to Risk mitigation measures. The questions had 3 possible answers:

- Yes, I agree
- I agree with the conclusion, but there are gaps in the findings that should be addressed
- No, I don't agree

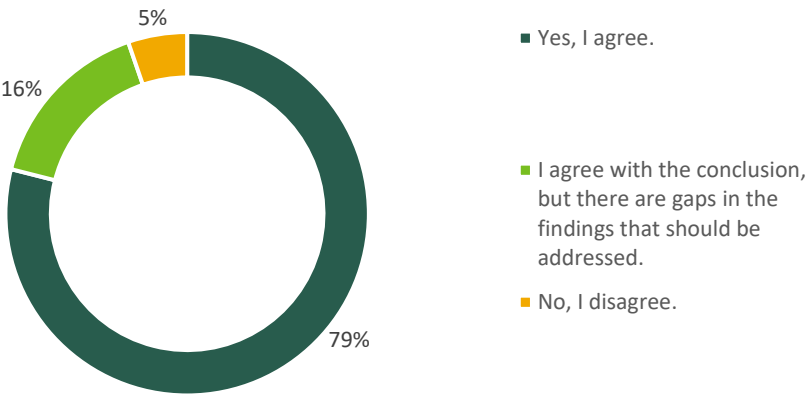
The majority of the feedback was positive (Yes, I agree) expressing a general agreement with the conclusions presented. The graphics with the analysis of the answers are presented next:



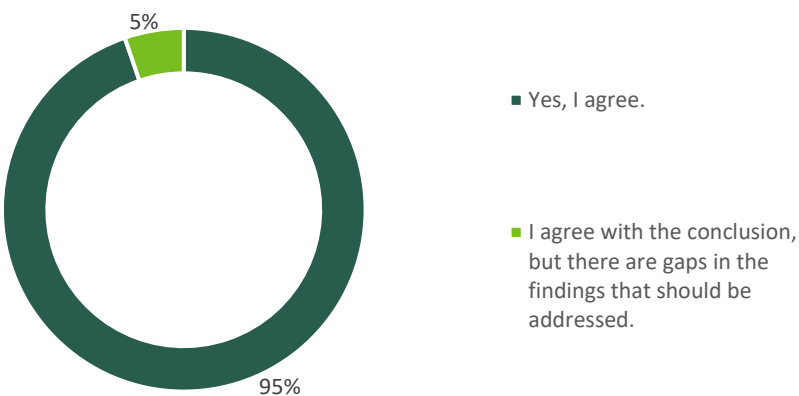
Q7. Do you agree with the risk assessment in the category Management Activities and Environmental Protection?



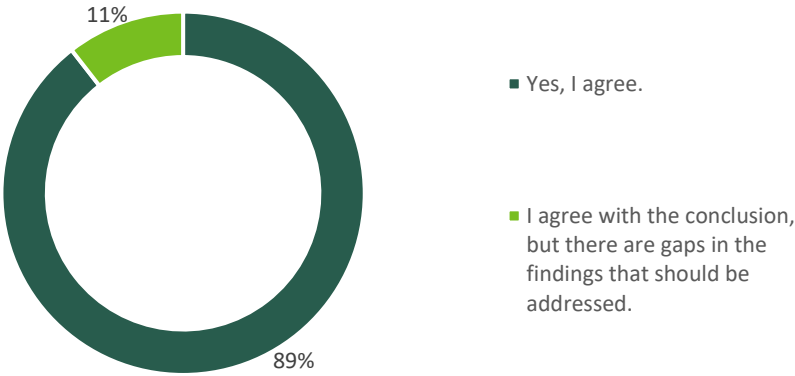
Q9. Do you agree with the risk assessment in the category Health and Safety?



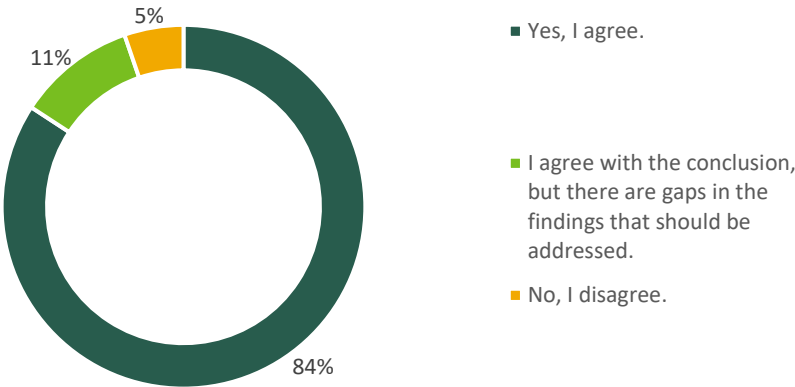
Q11. Do you agree with the risk assessment in the category Human and Labour Rights?



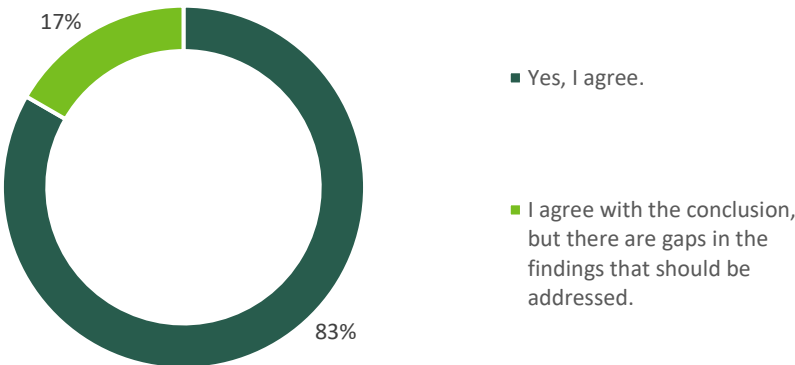
Q13. Do you agree with the risk assessment in the category
Third Parties rights?



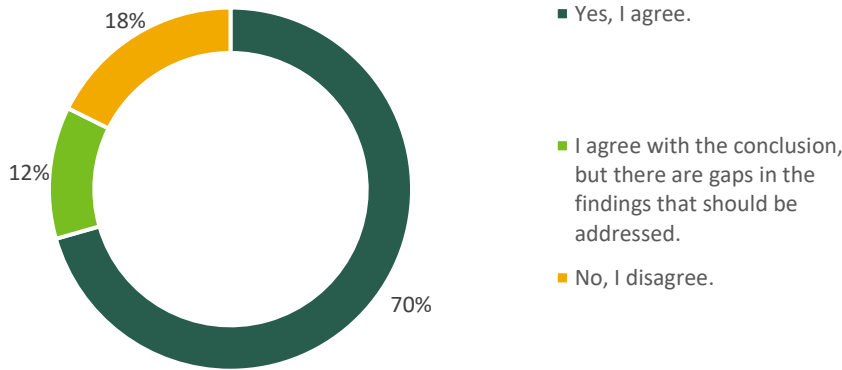
Q15. Do you agree with the risk assessment in the category
Trade and transport?



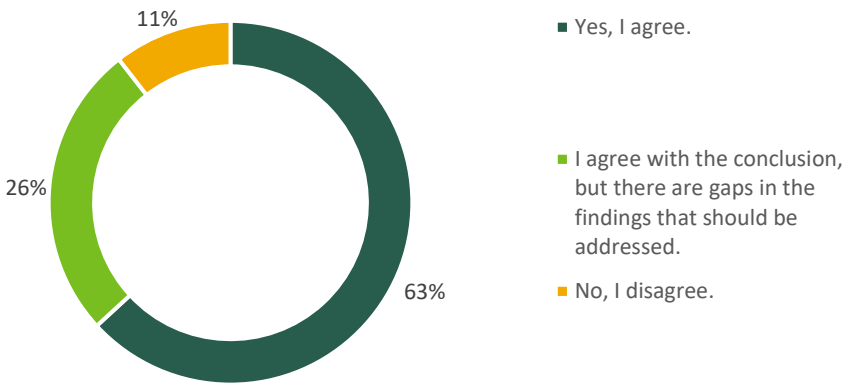
Q17. Do you agree with the risk assessment in the category
Due diligence and due care?



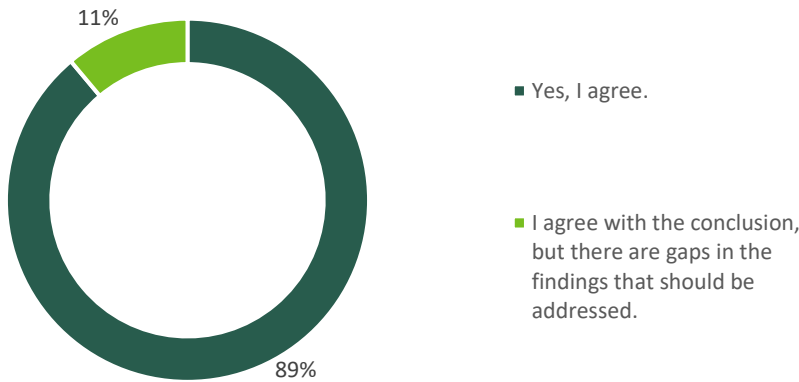
Q19. Do you agree with the risk assessment in the category Conversion and forest degradation?



Q21. Do you agree with the risk assessment in the category High Conservation Values?



Q23. Do you agree with the risk assessment in the category Genetically Modified Organisms?



By analysing the graphics above we can see clearly that there is a wide and general agreement with the assessment made. For some categories the participants identified gaps in the assessment, and in the 2nd draft some information was added into some indicators to try to solve this gap. However, the participants that answered that a gap existed didn't identify exactly what they considered was not enough explained. This was addressed through the answer to the comments received.

Another important information to analyse is related with mitigation measures and RM documents. The majority of the participants considered that both are appropriate to mitigate risks. Eventhough they were considered appropriate there were some comments regarding changing the steps order in their implementation. This was taken into consideration and mitigation were edited, not to change the content but to be aligned with the received comments and also to accommodate the guidelines developed.



Comments Received

For each category it was possible to leave comments to be considered when developing the 2nd draft.

Below we can find the comments received and the answers given by the SDG.

Land Use and Management	
2. Do you have any additional information that should be considered? If so, please provide it here.	FSC answer
Creo que las medidas de control de riesgos estás puestas de manera exageradamente.	This indicator is classified as negligible risk. The mitigation measures were defined for indicators 16, 56, 58 and 60 and are related with the protection of biodiversity, HCV and degradation.
<p>My comments are for Land Use and Management:</p> <ul style="list-style-type: none"> • Transparent and accountable land administration and appropriate portal for the purpose which could include following • Recognition and integration of customary and indigenous land rights • Robust, technology-enabled land and forest monitoring systems • Enforcement of sustainability standards and certification schemes • Inclusive, participatory land-use planning aligned with climate resilience and biodiversity objectives 	<p>Customary rights are well defined in the legislation that is upheld and respected. The rights of the local communities that manage the community forest areas are clearly identified in legislation that is upheld and respected. The Portuguese authorities have been working on developing platform applications that facilitate land use and forest monitoring: Land Use Monitoring System (Sistema de Monitorização da Ocupação de Solos (SMOS)).</p> <p>Public consultation for land use plans is mandatory, and they have to consider climate change and biodiversity protection. There is a Climate Framework Law that mandates Municipalities to develop a Climate Plan. This Climate Plan defines several measures, that have impact on land use planning or depend on the land use plans that are defined.</p> <p>There is an online platform for participating in the public consultations. New references were added for the indicators of this section, namely the one related with public participation mechanisms and the existence of land use monitoring systems/information.</p>

<p>Se siguiere revisar evaluación de riesgos basada en ISO 31000 es un proceso sistemático para identificar, analizar y evaluar los riesgos que una organización puede enfrentar. La evaluación de riesgos en la categoría de uso y gestión del suelo. Esto implica evaluar la probabilidad y el impacto de eventos que pueden comprometer la salud humana, la biodiversidad y la sostenibilidad del ecosistema. La evaluación de riesgos en la categoría de uso y gestión del suelo:</p> <ol style="list-style-type: none"> 1. Identificación de peligros, 2. Análisis de la vulnerabilidad, 3. Análisis de la exposición, 4. Cuantificación del riesgo, 5. Evaluación de la aceptabilidad, 6. Implementación de medidas de mitigación. <p>Riesgos específicos en la categoría de uso y gestión del suelo: Contaminación del suelo, Erosión del suelo, Compactación del suelo, Salinización del suelo, Acidificación del suelo, Perdida de materia orgánica.</p> <p>La evaluación de riesgos en la categoría de uso y gestión del suelo es un proceso fundamental para garantizar la protección de la salud humana y la sostenibilidad del medio ambiente. https://www.linkedin.com/in/luis-reinaldo-pino-lavado-5a62123b/</p>	<p>The assessment was made following the requirements identified in the Procedure FSC-PRO-60-006b V2-0, regarding the development of Risk assessments.</p>
<p>Please see point 31.</p>	<p>The comments presented are related with the concept of Control Wood and the need to have a revision on the Principles and Criteria (P&C). This process is presently in revision and is on the Conceptual phase of the process. This comment should be presented to the revision team, so it can be considered. Public consultations will take place, and they are the perfect forum for presenting the arguments presented in point 31. Nevertheless, they will be presented to FSC International by the process lead.</p>
<p>In fact the formally border Indonesian forest area are grey. Forest area boundary markers are unclear and poorly maintained by national forestry officers.</p>	<p>This must be a mistake. Portugal only has boarders with Spain and they are very well defined.</p>

Indigenous knowledge and cultural differences should be taken into account.	There are no indigenous people in Portugal, only local communities. Local communities are the people that live in the Baldios (community managed areas) and their rights are well identified in legislation and are respected and enforced in the country. There are no cultural differences between the people that live in the Baldios and the rest of the population.
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Taxes and Fees	
4. Do you have any additional information that should be considered? If so, please provide it here.	FSC answer
La evaluación de riesgos en la categoría de "Impuestos y Tasas" La identificación y análisis de riesgos relacionados con la transparencia, legalidad y gestión adecuada de los impuestos y tasas aplicables a la cadena de suministro de madera certificada FSC. El objetivo de esta evaluación es: Identificar riesgos potenciales, Evaluar la probabilidad e impacto de estos riesgos, Implementar medidas de mitigación. La evaluación de riesgos en la categoría de "Impuestos y Tasas" puede incluir: Revisión de la documentación fiscal, Análisis de la gestión de pagos, Evaluación de la gestión de la cadena de suministro, Evaluación de la transparencia. Medidas de mitigación: Implementar sistemas de gestión de impuestos y tasas transparentes y auditable. Realizar revisiones periódicas de la documentación fiscal y de los pagos. Asistir a capacitaciones y talleres sobre legislación fiscal. Colaborar con las autoridades fiscales y otros organismos reguladores. La evaluación de riesgos en la categoría de "Impuestos y Tasas" es un componente esencial para garantizar la sostenibilidad y la integridad de la cadena de suministro FSC. Permite a las empresas identificar, evaluar y gestionar los riesgos relacionados con impuestos y tasas, contribuyendo a la transparencia y a la legalidad en la industria forestal. https://www.linkedin.com/in/luis-reinaldo-pino-lavado-5a62123b/	The assessment was made following the requirements identified in the Procedure FSC-PRO-60-006b V2-0, regarding the development of Risk assessments.
Please see point 31.	The comments presented are related with the concept of Control Wood and the need to have a revision on the Principles and Criteria (P&C). This process is presently in revision and is on the Conceptual phase of the process. This comment should be presented to the revision team, so it can be considered. Public consultations will take place and they are the perfect

	forum for presenting the arguments presented in point 31. Nevertheless they will be presented to FSC International by the process lead.
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Corruption and data/document falsification	
6. Do you have any additional information that should be considered? If so, please provide it here.	FSC answer
My previous comments addresses the issue	The previous comment were related with land use and management and the development/existence of tools for monitoring land use and also assure public participation in the development of the plans. Both situation are in place in the country.
Corrupción y falsificación de datos/documentos implica identificar, evaluar y mitigar riesgos de que se produzcan acciones corruptas o falsificaciones, incluyendo la alteración de datos o documentos. Esto requiere implementar medidas preventivas, como la creación de canales de denuncia confidenciales y la capacitación del personal. Resumen y detalles : Identificación y Evaluación de Riesgos, Puntos vulnerables, Factores de riesgo. Prevención y Mitigación, Una Políticas anticorrupción, Controles internos, Canales de denuncia, Capacitación y sensibilización, Debida diligencia. Monitoreo y Mejora Continua, Evaluación periódica, Adaptación a las nuevas amenazas, Mejora de la gestión de riesgos. Medidas específicas: Para la falsificación de datos/documentos: Implementar sistemas de control de acceso a la información, sistemas de firma digital, verificación de datos y auditorías regulares. Para la corrupción: Crear códigos de ética, establecer políticas de gestión de conflictos de interés, implementar sistemas de control de pagos y transparencia en la contratación pública. La gestión de riesgos de corrupción y falsificación es un proceso continuo que requiere la participación de todos los niveles de la organización, desde la alta dirección hasta el personal de campo. La prevención y la mitigación de estos riesgos son fundamentales para garantizar la transparencia, la integridad y la eficiencia de la organización. https://www.linkedin.com/in/luis-reinaldo-pino-lavado-5a62123b/	The assessment was made following the requirements identified in the Procedure FSC-PRO-60-006b V2-0, regarding the development of Risk assessments.

Please see point 31.	The comments presented are related with the concept of Control Wood and the need to have a revision on the Principles and Criteria (P&C). This process is presently in revision and is on the Conceptual phase of the process. This comment should be presented to the revision team, so it can be considered. Public consultations will take place and they are the perfect forum for presenting the arguments presented in point 31. Nevertheless they will be presented to FSC International by the process lead.
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Management Activities and Environmental Protection	
8. Do you have any additional information that should be considered? If so, please provide it here.	FSC answer
<p>Protección del medio ambiente que involucra la gestión de riesgos comprende una serie de actividades que buscan identificar, evaluar y mitigar posibles impactos ambientales negativos. Estas actividades abarcan desde la evaluación de riesgos y la mitigación de daños hasta la prevención y la respuesta a emergencias ambientales. La gestión de riesgos ambientales: Identificación y evaluación de riesgos, Mitigación y prevención, Respuesta a emergencias, Monitoreo y evaluación, Adaptación al cambio climático. Actividades concretas: Establecimiento de normas y regulaciones, Diseño y construcción de infraestructura, Desarrollo de planes de contingencia, Educación y sensibilización, Investigación y desarrollo. La gestión de riesgos ambientales es un proceso continuo que requiere la colaboración de diversos actores, desde el gobierno hasta la sociedad civil, para proteger el medio ambiente y garantizar la sostenibilidad. https://www.linkedin.com/in/luis-reinaldo-pino-lavado-5a62123b/</p>	<p>The assessment was made following the requirements identified in the Procedure FSC-PRO-60-006b V2-0, regarding the development of Risk assessments.</p>
Please see point 31.	The comments presented are related with the concept of Control Wood and the need to have a revision on the Principles and Criteria (P&C). This process is presently in revision and is on the Conceptual phase of the process. This comment should be presented to the revision team, so it can be considered. Public consultations will take place and they are the perfect forum for presenting the arguments presented in point 31. Nevertheless they will be presented to FSC International by the process lead.

<p>Regarding indicator 16, it is only identified the risk in the areas located inside classified areas with no management plan. But the other areas where no management plan is defined, should also be included in the non-negligible risk as habitats also occur outside the classified areas and most people are unable to recognise protected habitats or species in order to protect them.</p>	<p>The threshold for this indicator is related with existence of legislation and compliance with it.</p> <p>Biodiversity conservation, protected sites, and the protection of endemic, rare, threatened or endangered species is regulated by different pieces of the Portuguese legislation. Portugal has ratified and transposed into national legislation different Conventions related with biodiversity conservation, namely CITES Convention, Bern Convention, Bonn Convention. The Habitats Directive that was transposed into national law has an annex that identifies the fauna and flora species that need to be strictly protected even if they are located outside Natura 2000, meaning that this Directive is implemented at a wider level when it comes to biodiversity conservation. Territorial plans such as PDM (that define production forest areas and conservation forest areas) or PROF (that defines different primary functions for the forest spaces of the different Sub-regions, and habitat and biodiversity conservation is one of the functions considered) also incorporate provisions for protection of biodiversity. This is not only applicable in Classified areas but in the entire territory.</p> <p>There are also different pieces of legislation that intends to protect specific species and their habitats, regardless of being inside a Classified area, it's the case of the cork and helm oak legislation and protection of holly. There are also plans in place for recovering of fauna, for example the Iberian wolf and Iberian lynx that are also implemented outside classified areas. And finally there are several LIFE projects that are, or were, implemented on the ground and have specific conservation purposes and are implemented all over the country.</p> <p>During the assessment it was considered that the legislation in place is robust and no evidences were found of systemic non compliance. Also there is monitoring in place regarding compliance with the existing legislation. However, by law the Natura 2000 Special conservation areas shall have an approved management plan and at the moment only 7 of these areas have such a plan. So the defined threshold for this indicator was achieved once the Portuguese government didn't manage to approve the mandatory management plans for the Natura 2000 Special Conservation Areas. It was therefore concluded that the responsible</p>
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	<p>authorities are not complying with the law (because the plans are not in place), and for classified areas without management plans the risk would be non-negligible, as for the rest of the country this threshold is not achieved.</p> <p>Information regarding LIFE projects and legislation for the protection of fauna and flora species was added into the description to better clarify that biodiversity conservation happens throughout the country. The number of Special Conservation Zones with management plan was also updated.</p>
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Health and Safety	
10. Do you have any additional information that should be considered? If so, please provide it here.	FSC answer
<p>Se recomienda considerar aspectos y directrices basado en La norma ISO 31000 es una norma internacional que proporciona principios y directrices para la gestión de riesgos en organizaciones. Ayuda a identificar, analizar, evaluar, tratar, supervisar y comunicar los riesgos de manera sistemática y estructurada, mejorando la eficacia operativa, la gobernanza y la confianza de las partes interesadas. Se recomienda considerar aspectos y directrices basado en La norma, ISO/IEC 31010 es una norma sobre gestión de riesgos, específicamente enfocada en las técnicas de evaluación de riesgos. Proporciona orientación para la selección y aplicación de diferentes técnicas de evaluación de riesgos, apoyando la toma de decisiones en situaciones de incertidumbre. La evaluación de riesgos en Salud y Seguridad Laboral (SSL) es un proceso sistemático que identifica, analiza y controla los peligros y riesgos en el lugar de trabajo para proteger la salud y seguridad de los trabajadores. El objetivo es garantizar que los empleados estén protegidos de daños y enfermedades relacionadas con su trabajo, a través de la implementación de medidas preventivas y de control. ¿Qué es una evaluación de riesgos? Es un estudio de un lugar de trabajo para identificar peligros y condiciones perjudiciales para los trabajadores. Implica identificar, analizar y controlar los peligros y riesgos en el lugar de trabajo. Determina qué medidas deben implementarse para eliminar o controlar el riesgo en cualquier situación potencial. Facilita la toma de decisiones y la adopción de medidas para cumplir con las obligaciones de la</p>	<p>The assessment was made following the requirements identified in the Procedure FSC-PRO-60-006b V2-0, regarding the development of Risk assessments.</p>

organización en materia de SSL. https://www.linkedin.com/in/luis-reinaldo-pino-lavado-5a62123b/	
Please see point 31.	The comments presented are related with the concept of Control Wood and the need to have a revision on the Principles and Criteria (P&C). This process is presently in revision and is on the Conceptual phase of the process. This comment should be presented to the revision team, so it can be considered. Public consultations will take place and they are the perfect forum for presenting the arguments presented in point 31. Nevertheless they will be presented to FSC International by the process lead.
Although it was used date for the primary activity sector, should be used the forest numbers which are not publically available but could be requested to the ACT authority - particularly for risk indicators 22 and 23.	The numbers were requested to GEP, but only the general information was provided, and was therefore considered the Best Available Information. A new request will be made.

Human and Labour Rights	
12. Do you have any additional information that should be considered? If so, please provide it here.	FSC answer
La evaluación de riesgos en la categoría de Derechos Humanos y Laborales (también conocida como "evaluación de riesgos sociales y de derechos humanos" o "Análisis de impactos y riesgos sociales y de derechos humanos", se enfoca en identificar y evaluar los posibles impactos negativos que una actividad o proyecto puede tener en los derechos humanos y laborales de las personas afectadas. Este proceso busca prevenir o mitigar estos impactos, garantizando que la empresa respete los derechos humanos y las normas laborales. Identificación de la "Materialidad", Análisis de la "Materialización", Evaluación de la "Gravedad", Análisis de los "Impactos", Medidas de Mitigación, Seguimiento y Monitoreo. Importante la evaluación de riesgos en Derechos Humanos y Laborales, Cumplimiento legal y regulatorio, Gestión del riesgo reputacional, Mejora de la relación con las partes interesadas, Contribución al desarrollo sostenible. La evaluación de riesgos en Derechos Humanos y Laborales es un proceso esencial para que las empresas puedan operar de manera responsable y sostenible,	The assessment was made following the requirements identified in the Procedure FSC-PRO-60-006b V2-0, regarding the development of Risk assessments.

<p>respetando los derechos humanos y las normas laborales. https://www.linkedin.com/in/luis-reinaldo-pino-lavado-5a62123b/</p>	
<p>Please see point 31.</p>	<p>The comments presented are related with the concept of Control Wood and the need to have a revision on the Principles and Criteria (P&C). This process is presently in revision and is on the Conceptual phase of the process. This comment should be presented to the revision team, so it can be considered. Public consultations will take place and they are the perfect forum for presenting the arguments presented in point 31. Nevertheless they will be presented to FSC International by the process lead.</p>

Third Parties rights	
14. Do you have any additional information that should be considered? If so, please provide it here.	FSC answer
<p>La categoría de Derechos de Terceros (también conocida como Derechos de Autor o Propiedad Intelectual) se centra en identificar y evaluar los posibles riesgos asociados con el uso, la distribución o la copia de material protegido por derechos de terceros. Esto implica examinar el estado de la protección de los derechos, determinar si se tiene la autorización necesaria para usar el material y evaluar las posibles consecuencias legales y comerciales si se infringe la propiedad intelectual de otros. Derechos de Terceros generalmente incluye los siguientes pasos: Identificación bosques protegido, Investigación del estado de la protección, Evaluación de la necesidad de autorización, Definición de riesgos y probabilidad de ocurrencia, Plan de mitigación de riesgos. La evaluación de Derechos de Terceros: Incumplimiento de derechos de autor, Falsificación o uso indebido de marcas, Vulneración de patentes, Uso no autorizado de software, Vulneración de diseños industriales. Una evaluación exhaustiva de los riesgos relacionados con los Derechos de Terceros, las organizaciones pueden minimizar el riesgo de infracciones legales y proteger su reputación y sus intereses comerciales. https://www.linkedin.com/in/luis-reinaldo-pino-lavado-5a62123b/</p>	<p>The assessment was made following the requirements identified in the Procedure FSC-PRO-60-006b V2-0, regarding the development of Risk assessments.</p>

Please see point 31.	The comments presented are related with the concept of Control Wood and the need to have a revision on the Principles and Criteria (P&C). This process is presently in revision and is on the Conceptual phase of the process. This comment should be presented to the revision team, so it can be considered. Public consultations will take place and they are the perfect forum for presenting the arguments presented in point 31. Nevertheless they will be presented to FSC International by the process lead.
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Trade and transport	
16. Do you have any additional information that should be considered? If so, please provide it here.	FSC answer
La evaluación de riesgos en la categoría de comercio y transporte implica identificar, analizar y evaluar los peligros y riesgos potenciales que pueden afectar a empresas y personas involucradas en estas actividades. Esto incluye riesgos relacionados con la seguridad vial, la integridad de las mercancías, la seguridad laboral, la contaminación ambiental, y la salud pública. Riesgos en el transporte de mercancías: Seguridad vial, Seguridad de las mercancías, Riesgos para la salud. Riesgos en el comercio: Robo y seguridad, Riesgos laborales, Gestión de riesgos financieros. https://www.linkedin.com/in/luis-reinaldo-pino-lavado-5a62123b/	The assessment was made following the requirements identified in the Procedure FSC-PRO-60-006b V2-0, regarding the development of Risk assessments.
Please see point 31.	The comments presented are related with the concept of Control Wood and the need to have a revision on the Principles and Criteria (P&C). This process is presently in revision and is on the Conceptual phase of the process. This comment should be presented to the revision team, so it can be considered. Public consultations will take place and they are the perfect forum for presenting the arguments presented in point 31. Nevertheless they will be presented to FSC International by the process lead.

Due diligence and due care	
18. Do you have any additional information that should be considered? If so, please provide it here.	FSC answer
<p>La debida diligencia se debe enfocar en identificar y evaluar los riesgos potenciales antes de tomar una decisión o realizar una acción, mientras que el debido cuidado se centra en tomar las medidas necesarias para minimizar o mitigar esos riesgos identificados. Diligencia y evaluación de riesgos, cuidado y evaluación de riesgos. la evaluación de riesgos es un proceso fundamental tanto para la debida diligencia como para el debido cuidado. La debida diligencia se enfoca en la identificación y evaluación de los riesgos, mientras que el debido cuidado se enfoca en la mitigación de esos riesgos. Ambos conceptos son importantes para la gestión eficaz de riesgos y la protección de los intereses de la organización.</p> <p>https://www.linkedin.com/in/luis-reinaldo-pino-lavado-5a62123b/</p>	<p>The assessment was made following the requirements identified in the Procedure FSC-PRO-60-006b V2-0, regarding the development of Risk assessments.</p>
<p>Please see point 31.</p>	<p>The comments presented are related with the concept of Control Wood and the need to have a revision on the Principles and Criteria (P&C). This process is presently in revision and is on the Conceptual phase of the process. This comment should be presented to the revision team, so it can be considered. Public consultations will take place and they are the perfect forum for presenting the arguments presented in point 31. Nevertheless they will be presented to FSC International by the process lead.</p>

Conversion and forest degradation	
20. Do you have any additional information that should be considered? If so, please provide it here.	FSC answer
<p>Conversión y degradación forestal implica identificar, analizar y valorar los riesgos asociados a la pérdida y alteración de los bosques, tanto en términos de deforestación (conversión a otros usos del suelo) como de degradación (deterioro de la calidad y funciones del bosque sin pérdida del área). Esta evaluación busca comprender las causas, los impactos y las posibles medidas de mitigación para</p>	<p>The assessment was made following the requirements identified in the Procedure FSC-PRO-60-006b V2-0, regarding the development of Risk assessments.</p>

<p>proteger los ecosistemas forestales. Conversión y degradación forestal generalmente incluye: Identificación de riesgos, Análisis de riesgos, Valoración de riesgos, Identificación de medidas de mitigación. La conversión y degradación forestal es crucial para: La conversión y degradación forestal es crucial para, Regular el clima, Proteger los servicios ecosistémicos, Promover el desarrollo sostenible. la evaluación de riesgos en la categoría Conversión y degradación forestal es un proceso esencial para comprender y abordar los desafíos que enfrentan los bosques a nivel global, contribuyendo a la protección de la biodiversidad, el clima y los servicios ecosistémicos.</p> <p>https://www.linkedin.com/in/luis-reinaldo-pino-lavado-5a62123b/</p>	
<p>Please see point 31.</p>	<p>The comments presented are related with the concept of Control Wood and the need to have a revision on the Principles and Criteria (P&C). This process is presently in revision and is on the Conceptual phase of the process. This comment should be presented to the revision team, so it can be considered. Public consultations will take place and they are the perfect forum for presenting the arguments presented in point 31. Nevertheless they will be presented to FSC International by the process lead.</p>
<p>Regarding indicator 56, it is only identified the risk in the areas located inside classified areas with no management plan. But the other areas where no management plan is defined, should also be included in the non-negligible risk as habitats also occur outside the classified areas and most people are unable to recognise protected habitats or species in order to protect them. A comment about the date used - An increase in forest area or an equivalent area between the years does not mean that there has been no conversion, as we know that there has been. It may mean that there has been conversion from forest to agriculture in some places and from agriculture to forest in others, with the final value being the same, but in any case, conversion has occurred. In the results of the data analysed it was demonstrated that there were conversion of natural forest within the classified areas where there is much more control by the authorities, the problem might be bigger outside those areas.</p>	<p>Assessment for indicator 56 was made use geospatial information and taking into consideration that In the national context, areas that have the characteristics of a Natura 2000 habitat will be those that can be considered as 'natural forest' and that are more likely located in Classified areas. These are the areas that were identified at national level has having the highest concentration of natural habitats/natural forests and therefore is where the risk was assessed through geographical information processing. The GIS analysis revealed that there was conversion to other land uses rather than agriculture leading to a non-negligible risk. It's true that the assessment was made in areas that have a higher level of protection, and a risk was identified but this may be linked with the lack of management plans that lead to not having conservation activities defined and planned, with monitoring and defined targets. This is why the risk was identified at this level.</p>

	The reference to the increase of forest area was used in the long description of risk to highlight the fact that forest area is increasing, and that part of this increase comes from native species (that can potentially constitute a natural forest). In the assessment there was never a relation between this increase and the fact that there is no conversion to other land uses rather than agriculture.
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High Conservation Values	
22. Do you have any additional information that should be considered? If so, please provide it here.	FSC answer
<p>La categoría de Altos Valores de Conservación (AVC) implica identificar y analizar los peligros que podrían afectar los valores biológicos, ecológicos, sociales o culturales de un área, buscando mitigar o prevenir esos impactos. Los AVC Son valores de conservación excepcionales que un área posee, como la biodiversidad, la existencia de ecosistemas únicos, la importancia social para las comunidades locales, o la presencia de sitios de valor cultural. Realiza la evaluación de riesgos en AVC: Identificación de AVC, Análisis de riesgos, Interpretación y precautorio, Mitigación y prevención. Importancia de la evaluación de riesgos en AVC: Ayuda a asegurar que las actividades desarrolladas en un área no comprometan los AVC. Contribuye a la gestión sostenible de los recursos naturales.</p> <p>https://www.linkedin.com/in/luis-reinaldo-pino-lavado-5a62123b/</p>	<p>The assessment was made following the requirements identified in the Procedure FSC-PRO-60-006b V2-0, regarding the development of Risk assessments.</p>
Please see point 31.	<p>The comments presented are related with the concept of Control Wood and the need to have a revision on the Principles and Criteria (P&C). This process is presently in revision and is on the Conceptual phase of the process. This comment should be presented to the revision team, so it can be considered. Public consultations will take place and they are the perfect forum for presenting the arguments presented in point 31. Nevertheless they will be presented to FSC International by the process lead.</p>

<p>HCV must be socialized understood properly by company staff and government staff to avoid misunderstandings in maintaining HCV areas.</p>	<p>The mitigation measures proposed have the objective of assuring that company staff understand what are HCV and the importance of maintaining them. Regarding government staff, the ones that have jurisdiction over Classified areas and nature conservation of cultural patrimony understand the natural or cultural values that are being protected. HCV's in Portugal are closely linked with figures that are protected by law: eg: Classified areas, IUCN species, CITES species, classified cultural patrimony, etc.</p>
<p>Indicators 58 and 60 only identify the risk in the areas located inside classified areas with no management plan. But the other areas where no management plan is defined, should also be included in the non-negligible risk as habitats also occur outside the classified areas and most people are unable to recognise protected habitats or species in order to protect them.</p>	<p>The assessment for the HCV category takes into consideration the HCV presence and threats caused by management activities. During the assessment the presence of HCV was considered to be more prominent in Classified areas, namely for HCV 1 and 3.</p> <p>Assessment for indicators 58 and 60 was done since Classified areas had already been assessed has having a non-negligible risk due to the lack of management plans. In fact, this were the areas where the risk was identified because the lack of a management plan will mean that forest managers/owners will not know what they have to protect.</p> <p>The reason for developing the assessment for just the Classified areas is related with the fact that:</p> <p>HCV 1: Concentrations of biological diversity including endemic species, and rare, threatened or endangered species, that are significant at global, regional or national levels. During the assessment was considered that this concentration exists on Classified areas, that were identified by the country as being the ones where natural habitats or species occurred in a more visible way and therefore needed to be protected. This means that at national level the areas that are identified as having biodiversity concentration are the Classified Areas.</p> <p>HCV 3: Ecosystems and habitats. Rare, threatened, or endangered ecosystems, habitats or refugia. In this attribute are considered the priority habitats listed in the Habitat Directive (Annex A) identified in the Management Unit, and the areas where they are more likely to exist are the Classified areas.</p> <p>The existence of a management plan is vital to know what we need to</p>

	<p>protect, as well to define management and monitoring activities with defined targets, this is applicable for both HCV and that was why the risk was identified at this level.</p> <p>Areas outside classified areas are covered by different legislation related with territorial planning (PROFs, PDM's, PGF's, REN,etc) , that also incorporates biodiversity protection elements. We must also mention that there are several LIFE projects in place that contribute to the implementation of conservation measures, and are implemented in different areas of the country, not just the Classified ones.</p>
<p>"Archaeological and historical cultural values important to local communities and indigenous peoples (VHC6) are identified and protected.", it is disagreed that this point is considered "Insignificant", considering that archaeological heritage, in addition to being a finite and non-renewable heritage, is protected by law, and its destruction is a crime punishable by law – Law No. 107/2001, of September 8.</p> <p>Record "number" 67 is characterized as: 4.3.2.1. Indicator category - "high conservation values";</p> <p>4.3.2.2. Risk Indicator – "Sites, resources, habitats and landscapes of global or national cultural, archaeological or historical importance (...) of local communities or identified and protected indigenous populations (HCV6)";</p> <p>4.3.2.3. Conclusion of the risk – Negligible risk. It is disagreed that this point is considered "Insignificant", considering that archaeological heritage, in addition to being a finite and non-renewable heritage, is protected by law, and its destruction is a crime punishable by law – Law No. 107/2001, of 8 September;</p> <p>Tal como já foi acima indicado discorda-se que o risco atribuído aos HVC6 seja As already indicated above, it is disagreed that the risk attributed to HVC6 is negligible, as well as that the degree of risk of forestry operations is low. It should be noted that there is a subcommittee on archaeological heritage in CT 145 that was working to assess the degrees of risk that the different forestry operations could have on the archaeological heritage, and in many of these operations, the</p>	<p>HCV 6 —Cultural values. Sites, resources, habitats and landscapes of global or national cultural, archaeological or historical significance, and/or of critical cultural, ecological, economic or religious/sacred importance for the traditional cultures of local communities or Indigenous Peoples, identified through engagement with these local communities or Indigenous Peoples.</p> <p>To be considered an HCV6 it is necessary that the sites are considered as critical for the local communities. This is the determinant point for a cultural/archaeological site be considered as HCV. Meaning that all archaeological patrimony is protected by law but not all of this patrimony is classified as HCV.</p> <p>It was considered that the sites that are of critical value for the local communities are well identified, once we are talking about either a classified value or a site that the community recognizes as being critical and therefore identifies it. It was also considered that in the Portuguese forest sector, if this an area is identified by the community as being critical, then this is a known fact and forest contractors and also forest owners/managers are aware of it. This has to do, not only with the size of the country, but also with the type of forest contractors that are majority small, local companies with a deep knowledge of this type of situations.</p> <p>The assessment mentions that this has been a topic that is being widely discussed among stakeholders, under the scope of TC 145, referring also to</p>

<p>archaeologists who were part of this subcommittee considered it to be of high risk to the archaeological heritage. It is important to resume this work and without its conclusion, Cultural Heritage I.P. will not be able to agree with the statement that "the risk of forest management activities threatening HVC6 is low."</p> <p>The arguments presented in the point above are reiterated. It should also be noted that, although afforestation and reforestation projects require approval by the Forestry Authority, only a small part of the forestry projects that interfere with elements of Cultural Heritage is sent for opinion to the Culture Units of the CCDR. This reality corroborates the fact that the risk of this type of project cannot be considered negligible or low for Cultural Heritage, in particular for the archaeological</p> <p>References – At this point only World Heritage and the Atlas of Classified Heritage and In the Process of Classification are indicated. The Geoportal of the Archaeologist's Portal and the indication, as a reference, of the Municipal Master Plans and other surveys of cultural heritage will have to be included;</p> <p>4.3.2.10. Experts – Cultural Heritage, I.P. is not on this list since it was not part of this subcommittee;</p> <p>4.3.2.11. Legislation – For Cultural Heritage, only the basic law of cultural heritage is indicated. The European Convention for the Protection of the Archaeological Heritage (revised), opened for signature in Valletta, Malta, on 16 January 1992 and ratified by the Portuguese State in the Resolution of the Assembly of the Republic No. 71/97, as well as the Regulation of Archaeological Works – Decree-Law No. 164/2014 of 4 November, will have to be added.</p> <p>4.3.2.12. Description of legal requirements – It is indicated that the legislation requires the constitution of buffers around archaeological areas and the implementation of measures to safeguard cultural heritage. Afforestation and reforestation projects require the identification of the existing cultural heritage in the areas and the definition of safeguard measures. Its approval depends on the ICNF, which must consult the Cultural Heritage authority for an opinion.</p>	<p>the collaboration that FSC Portugal has been having with the Cultural Patrimony entities regarding protection of HCV 6 and ultimately the entire cultural patrimony. This work needs to continue, but it's important to consider the critical value for a community in order to be considered as an HCV.</p> <p>The mentioned legislation was added into the assessment.</p>
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In the context of EIA, there are also measures foreseen for the identification and protection of cultural heritage. The PDM also identifies the cultural heritage of the municipality and defines safeguarding measures for this heritage. It is also indicated that there are procedures to control violations [of cultural heritage legislation] and there are different entities to monitor.	
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Genetically Modified Organisms	
24. Do you have any additional information that should be considered? If so, please provide it here.	FSC answer
<p>Los Organismos Genéticamente Modificados (OGM) es un proceso crucial para determinar los posibles impactos negativos que pueden surgir de su uso, tanto para la salud humana y animal, como para el medio ambiente. Este proceso implica analizar exhaustivamente la información disponible sobre la genética, ecología y posibles efectos del OGM, así como sus interacciones con otras especies y el eco. sistema. OGM generalmente incluye los siguientes pasos: Identificación de riesgos, Análisis de la información, Evaluación del riesgo, Gestión del riesgo. La evaluación de riesgos de los OGM: Prueba de la inocuidad, Principio de precaución, Evaluación caso por caso, Participación pública. La evaluación de riesgos de los OGM es un proceso continuo y dinámico, que debe adaptarse a los avances científicos y a las nuevas preocupaciones que puedan surgir.</p> <p>https://www.linkedin.com/in/luis-reinaldo-pino-lavado-5a62123b/</p>	<p>The assessment was made following the requirements identified in the Procedure FSC-PRO-60-006b V2-0, regarding the development of Risk assessments.</p>

The comments regarding mitigation measures were the following:

Mitigation measures	
26. Are there other potential mitigation measures that should be included?	FSC answer
<p>Indicador 16:</p> <p>1st step – Document verification A – The supply contract introduces a clause with information regarding harvesting in Classified Areas and the importance of assuring protection of biodiversity, habitats and endangered/protected species.</p> <p>2nd step – Field audit An internal field audit program to evaluate the impacts of harvesting in areas where there are Classified area. This field verification is composed by a check list, identifying the threats for the potentially present habitats/species in the Classified area where the harvesting site is located. This field audit should include a database verification and document verification:</p> <p>A – CH analyse the felling permit (or other documentation like the pine resin or pine cone declaration) to identify the harvesting site. The cartography is used in this assessment to check if the harvesting site is located within a Classified area and if they are, check if the area has a management plan in place.</p> <p>B – If the harvesting site is located in a Classified area with management plan:</p> <p>i. Consult the management plan of the Classified Area to check if there is a need for additional documentation (like special authorizations) that is presented with the felling permit.</p> <p>C – If the harvesting site is located in a Classified area with no management plan:</p> <p>i. Check if the management unit has an approved forest management plan (It can be an individual FMP, a grouped FMP (ZIF/UGF/AIGP) or a RJAAR project);</p> <p>Indicador 56:</p> <p>1st step – Document verification A – The supply contract introduces a clause with information regarding harvesting of natural forest located in Classified Areas to assure:</p> <ul style="list-style-type: none"> i. There is no conversion to other type of forest; ii. Natural regeneration is promoted; iii. Biodiversity, habitats and endangered/threatened species are protected. 	<p>The proposal to change the steps of the mitigation measure was considered. They were edited to incorporate the suggested and also according with the guidelines for drafting mitigation measures (FSC document).</p>

2nd step – Field audit An internal field audit program to evaluate the impacts of harvesting in areas where there are no management plans in place is developed. This field audit should include a database verification and document verification:

A – CH analyse the felling permit (or other documentation like the pine resin or pine cone declaration) to identify the harvesting site. The cartography of the forest habitats is used in this assessment to check if the harvesting site is located within a Classified area and if they are, check if the area has a management plan in place.

B – If the harvesting site is located in a Classified area with management plan:

- i. Consult the management plan of the Classified Area to check if there is a need for additional documentation (like special authorizations) that is presented with the felling permit.

C – If the harvesting site is located in a natural forest located in a Classified area with no management plan:

- i. Check if the management unit has an approved forest management plan (It can be an individual FMP, a grouped FMP (ZIF/UGF/AIGP) or a RJAAR project);

Indicador 58:

1st step – Document verification A – The supply contract introduces a clause with information regarding harvesting in Classified Areas and the importance of assuring protection of biodiversity, habitats and endangered/protected species.

2nd step – Field audit An internal field audit program to evaluate the impacts of harvesting in areas where there are no management plans in place is developed. This field audit is composed by a checklist, identifying the threats for the potentially present habitats/species in the Classified area where the harvesting site is located:

A – CH analyse the felling permit (or other documentation like the pine resin or pine cone declaration) to identify the harvesting site. The cartography is used in this assessment to check if the harvesting site is located within a Classified area and if they are, check if the area has a management plan in place.

B – If the harvesting site is located in a Classified area with management plan:

- i. Consult the management plan of the Classified Area to check if there is a need for additional documentation (like special authorizations) that is presented with the felling permit.

C – If the harvesting site is located in a Classified area with no management plan:

- i. Check if the management unit has an approved forest management plan (It can be an individual FMP, a grouped FMP (ZIF/UGF/AIGP) or a RJAAR project);

Indicador 60:

<p>1st step – Document verification A – The supply contract introduces a clause with information regarding harvesting in Classified Areas and the importance of assuring protection of biodiversity, habitats and endangered/protected species.</p> <p>2nd step – Field audit An internal field audit program to evaluate the impacts of harvesting in areas where there are no management plans in place is developed. This field audit is composed by a checklist, identifying the threats for the potentially present habitats/species in the Classified area where the harvesting site is located:</p> <p>A – CH analyse the felling permit (or other documentation like the pine resin or pine cone declaration) to identify the harvesting site. The cartography is used in this assessment to check if the harvesting site is located within a Classified area and if they are, check if the area has a management plan in place.</p> <p>B – If the harvesting site is located in a Classified area with management plan:</p> <p>i. Consult the management plan of the Classified Area to check if there is a need for additional documentation (like special authorizations) that is presented with the felling permit.</p> <p>C – If the harvesting site is located in a Classified area with no management plan:</p> <p>i. Check if the management unit has an approved forest management plan (It can be an individual FMP, a grouped FMP (ZIF/UGF/AIGP) or a RJAAR project);</p>	
<p>Mitigation measures must identify the species considered to be at risk so that we can more easily exclude those supplied.</p>	<p>The NRA is applicable to all types of species, and to timber and non-timber forest products and therefore the mitigation measures can't be implemented just for some species. The Organization needs to assess their sources of supply to classify if they are sourcing from areas that have non-negligible risk or not. Also mitigation measures are not mandatory, they are optional, meaning that the CH may implement different measures as long as they mitigate the risk that was identified.</p>
<p>Indicador 16: biodiversity protection during harvesting in Classified Areas.</p> <p>1) Document Verification: Contract includes clause on biodiversity and habitat protection.</p> <p>2) Field Audit - Internal audit with checklist to identify threats to habitats/species.</p> <ul style="list-style-type: none"> - Verify felling permit and cartography to locate harvesting site. - If site is in a Classified Area: > With management plan: Check for required documentation. > Without management plan: Confirm existence of an approved Forest Management Plan (FMP, ZIF/UGF/AIGP, or RJAAR). <p>Indicador 56: forest conversion and promote regeneration in natural forests within Classified Areas.</p> <p>1) Document Verification: Contract clause ensures no forest type conversion; Promotion of</p>	<p>The proposal to change the steps of the mitigation measure was considered. They were edited to incorporate the suggested and also according with the guidelines for drafting mitigation measures (FSC document).</p>

<p>natural regeneration; Protection of biodiversity and endangered species.</p> <p>2) Field Audit - Focus on areas without management plans. - Verify felling permit and cartography.</p> <p>- If site is in a Classified Area: > With management plan: Check for required documentation.</p> <p>> Without management plan: Confirm existence of an approved Forest Management Plan.</p> <p>Indicador 58: harvesting impacts in Classified Areas lacking management plans.</p> <p>1) Document Verification: Contract clause emphasizes biodiversity and habitat protection.</p> <p>2) Field Audit - Checklist used to identify threats to habitats/species. - Verify felling permit and cartography.</p> <p>- If site is in a Classified Area: > With management plan: Check for required documentation.</p> <p>> Without management plan: Confirm existence of an approved Forest Management Plan.</p> <p>Indicador 60: Similar to Indicator 58, focused on harvesting in Classified Areas without management plans.</p> <p>1) Document Verification: Contract clause emphasizes biodiversity and habitat protection.</p> <p>2) Field Audit - Checklist used to identify threats to habitats/species. - Verify felling permit and cartography. - If site is in a Classified Area: > With management plan: Check for required documentation. > Without management plan: Confirm existence of an approved Forest Management Plan.</p>	
<p>Buscar reducir la probabilidad o el impacto de un riesgo potencial. Esto puede incluir la implementación de controles, el desarrollo de planes de contingencia, la capacitación de empleados, la adquisición de seguros, y la identificación y evaluación de riesgos.</p> <p>Estrategias de Mitigación de Riesgos: Identificación y Evaluación de Riesgos, Planificación y Preparación, Capacitación y Comunicación, Implementación de Controles, Aislamiento de Riesgos, Transferencia de Riesgos, Evaluación Periódica. Las medidas de mitigación deben ser personalizadas según el tipo de riesgo y la organización o proyecto involucrado. Es importante tener un enfoque proactivo y estar preparados para responder ante cualquier amenaza potencial. https://www.linkedin.com/in/luis-reinaldo-pino-lavado-5a62123b/</p>	<p>The mitigation measures defined address the mentioned topics.</p>

<p>Indicators 16, 58 and 60:</p> <p>1st step – Document verification A – The supply contract introduces a clause with information regarding harvesting in Classified Areas and the importance of assuring protection of biodiversity, habitats and endangered/protected species.</p> <p>2nd step – Field audit An internal field audit program to evaluate the impacts of harvesting in areas where there are Classified area. This field verification is composed by a check list, identifying the threats for the potentially present habitats/species in the Classified area where the harvesting site is located. This field audit should include a database verification and document verification:</p> <p>A – CH analyse the felling permit (or other documentation like the pine resin or pine cone declaration) to identify the harvesting site. The cartography is used in this assessment to check if the harvesting site is located within a Classified area and if they are, check if the area has a management plan in place.</p> <p>B – If the harvesting site is located in a Classified area with management plan:</p> <p>i. Consult the management plan of the Classified Area to check if there is a need for additional documentation (like special authorizations) that is presented with the felling permit.</p> <p>C – If the harvesting site is located in a Classified area with no management plan:</p> <p>i. Check if the management unit has an approved forest management plan (It can be an individual FMP, a grouped FMP (ZIF/UGF/AIGP) or a RJAAR project);</p>	<p>The proposal to change the steps of the mitigation measure was considered. They were edited to incorporate the suggested and also according with the guidelines for drafting mitigation measures (FSC document).</p>
<p>None on the scope of this document. Forestry training, extension, support, investment, inspection, monitoring, etc. are mitigation measures to mitigate risks on the scope of forest management.</p>	<p>No comment</p>
<p>So far, there have been no genetic resources indicated as MDF</p>	<p>No comment</p>

Following question 27 on the fact that risk mitigation documents considered appropriate, (the majority of the feedback was positive), if the participant considered that they weren't they could explain why. This are the received answers:

28. If “No”, please explain why.
FSC answer

<p>If non-compliance risk cases are identified, then must be implemented measures targeting the operator.</p>	<p>The risks were identified for the source type of management units with no management plan, located within Classified areas with no management plan. The risk of non compliance is what the defined mitigation measures intend to achieve. The first mitigation measure targets the operator. The inclusion of clauses regarding harvesting in Classified Areas intends to create awareness and knowledge for the identified risks. The internal field audit with the check list also targets the operator.</p>
<p>Pueden mitigar los riesgos en la compra de materiales controlados con diversas estrategias de verificación, incluyendo: Evaluación de riesgos inicial, Verificación de proveedores, Contratos y cláusulas, Monitorización continua, Recursos de verificación, Planificación de contingencia. La implementación estas estrategias de verificación, las organizaciones pueden mitigar eficazmente los riesgos asociados con la compra de materiales controlados. https://www.linkedin.com/in/luis-reinaldo-pino-lavado-5a62123b/</p>	<p>The mitigation measures defined address the mentioned topics.</p>
<p>Please see point 31.</p>	<p>The comments presented are related with the concept of Control Wood and the need to have a revision on the Principles and Criteria (P&C). This process is presently in revision and is on the Conceptual phase of the process. This comment should be presented to the revision team, so it can be considered. Public consultations will take place and they are the perfect forum for presenting the arguments presented in point 31. Nevertheless they will be presented to FSC International by the process lead.</p>

Finally there was a part of the consultation dedicated to other comments. The received feedback was the following:

Additional documents	
30. If “Yes”, please list them down.	FSC answer
In the Autonomous Regions (Madeira and Azores), the cuts are subject to a harvest permit granted by the regional government. In this case, the harvests permits should be considered.	It was included in the following document "Felling Manifest and Traceability of Woody Material". In the responsible entities is possible to see DRRF and IFCN, but it is more clear if it is indicated as a different document once it is not a MCA. Harvest permit was added into RM documents.
In the case of the Portuguese Autonomous Regions (Madeira and Azores), must be considered the declarations harvesting authorization. Therefore, these risks for these regions are Negligible Risk.	It was included in the following document "Felling Manifest and Traceability of Woody Material". In the responsible entities is possible to see DRRF and IFCN, but it is more clear if it is indicated as a different document once it is not a MCA. Harvest permit was added into RM documents.
Sí, existen varios documentos adicionales que pueden ser útiles e incluso necesarios para una evaluación de riesgos exhaustiva. Dependiendo del contexto, se pueden incluir documentos como: Matriz de riesgos, Informe de condiciones de salud, Plan Anual de trabajo en Seguridad y Salud en el Trabajo, Fichas de seguridad de materias primas, Planificación de la actividad preventiva, Registro de riesgos, Informes de gestión de riesgos, Listas de verificación, Imágenes de referencia, Documentación de soporte, Documentos de legislación específica. En resumen, la evaluación de riesgos no se limita a un documento único. Se debe considerar una variedad de documentos que ayuden a identificar, analizar y controlar los riesgos de manera efectiva. https://www.linkedin.com/in/luis-reinaldo-pino-lavado-5a62123b/	The RM documents listed are very diverse and some of this type of documents were identified in the assesement. The RM documents are considered to be enough.
In the Autonomous Regions (Madeira and Azores) the harvests permits should be considered as an evidence of low risk.	Harvest permits were added into the RM documents. The harvest permit could be considered like a plan, and therefore the risk is negligible.

Other comments

31. Other comments.

FSC answer

La Evaluación de Riesgos FSC (Forest Stewardship Council) es un proceso vital para asegurar que la madera utilizada por las empresas cumpla con los estándares ambientales y sociales del FSC. En Portugal, como en otros países, las empresas que desean obtener una certificación FSC deben llevar a cabo una evaluación de riesgos para identificar posibles problemas en su cadena de suministro. Importancia la Evaluación de Riesgos FSC Portugal: Asegurar la sostenibilidad, Cumplir con los estándares FSC, Mejorar la gestión de la cadena de suministro. Realización la Evaluación de Riesgos FSC Portugal: Identificación de riesgos, Análisis de riesgos, Desarrollo de medidas de mitigación, Implementación y seguimiento. Beneficios de la Evaluación de Riesgos FSC: Beneficios de la Evaluación de Riesgos FSC, Acceso a nuevos mercados, Reducción de riesgos. La evaluación de Riesgos FSC es un proceso crucial para asegurar la sostenibilidad de la madera utilizada por las empresas y para cumplir con los estándares del FSC. En Portugal, como en otros países, es fundamental que las empresas que desean obtener la certificación FSC realicen una evaluación de riesgos rigurosa y efectiva. https://www.linkedin.com/posts/luis-reinaldo-pino-lavado-5a62123b_qu%C3%A9-es-un-incendio-forestal-resumen-activity-7290110389613195264-mlcZ?utm_source=share&utm_medium=member_desktop&rcm=ACoAAAhlaC4BhR4OxmU854leR4xLUEvZ8AJU2S0 Luis Reinaldo Pino Lavado Ingeniero en Electrónica y Telecomunicaciones. IEM Gestor Energético Nacional Eficiencia Energética ISO 50.001 Gestión de Riesgos Organizaciones ISO 31.000, Colegio de Ingenieros del Perú Consultor Nacional proyectos Eficiencia Energética Auditor Líder Internacional TÜV Rheinland Chile S.A IRCA ISO 50.001 Gestor Ambiental Sustentable SEIA Mentor Senior IncubaUdeC Universidad de Concepción Miembro Individual FSC Chile Cámara Económica Sur. Miembro Individual FSC Internacional Cámara Económica Sur.

no comment

I think CW is an extreme weak, fragile and poor concept, which in practice does not promote almost nothing and is easily bypassed with “papers”, and, therefore, CW concept must be abandoned. CW categories are risks for FSC’s reputation, and this subject shall be just addressed in the framework of the Policy for Association. FSC must increase its own capacity of identifying potential violations based on stakeholder participation and CB’s performance. And to increase the capacity of identifying potential violations, FSC must invest on communication, to increase stakeholder (public, market, etc.) knowledge about FSC, and to increase demand on FSC 100% certified materials. And must also invest in training, especially for CBs/auditors and for FSC staff, mainly of

The comments presented are related with the concept of Control Wood and the need to have a revision on the Principles and Criteria (P&C). This process is presently in revision and is on the Conceptual phase of the process. This comment should be presented to the revision team, so it can be considered. Public consultations will take place and they are the perfect forum for presenting the arguments presented in point 31. Nevertheless they will be presented to FSC International by the process lead.

local offices, in order to ensure effective supervision. "Mix" logo/claim, indicating that products have not only raw material from well managed forests, shall naturally have lower demand and acceptance on market and society. For me, is time to review P&C to identify the essential aspects to be considered at management and operational level, and is also time to abandon CW concept. To drive forest stewardship by making certification attractive, useful, and viable, I believe is time to focus and simplify the P&C and the system as a whole, providing the framework for streamline all certification process and procedures. For me, the "big problem" is to have 10 Principles, 70 criteria and more than 200 indicators to just promote responsible forest management; to take care of environmental and social resources and values, and ensure viability. That is too much. I also think there is an "extreme standardization process" being developed by FSC, which is wrong and is transforming the FM (and even CoC) evaluations on a useless and boring process. Instead, I believe the right way is to have essential rules and requirements for certification, focusing on take care of environmental and social resources and values, and on ensuring viability. So, for me, the starting point is to review P&C and define only a few Principles (3 or 4...) and some Criteria to identify the essential aspects to be considered at management and operational level. And, in order to have effective and credible processes and procedures to achieve a streamlined, feasible, stable, and easily understandable normative framework (FSC Global Strategy), I think it is necessary to have only general Principles and Criteria for forest management. This will really enable more focused and efficient (and cost effective) audits by certification bodies. Indicators shall only be identified by FSC local offices (but not for 70 criteria!!!) and "low risk indicators" simply shall not exist. Instead to produce more and more normative documents, FSC should produce guidance documents on important issues, with useful and practical information to help organizations (CH), CBs, auditors and stakeholders, to really promote the responsible management of forests. Again, I believe FSC must focus on FM certification on the basis of a simple and worldwide recognized standard (P&C), investing in what is the most important: to have qualified CBs and auditors to evaluate, supported on knowledge, experience and sensibility, with effective public/stakeholder consultation and participation, the compliance with the P&C in any socio-environmental context (small, large, indigenous, natural, plantations, tropical, temperate, etc.), under the effective supervision of the FSC, a role that shall be mainly played by FSC local offices.

Hopely FSC Forest Management could be implemented in small holder concession by using a cheaper audit cost

FSC Forest management in Portugal is regulated by the FSS in place that is applicable to all types of forests and ownerships and has provisions for SLIMFs (Small and low intensity managed forests). Portugal is a country of smallholders, but through group certification it is possible to implement FSC FM certification.

<p>A comment in general - in several cases it is referred to Manifestos as Harvesting licenses but it is in fact a communications of the harvesting. That is, there is no approval or authorisation for that harvesting from the national authorities.</p>	<p>That is correct, except for Azores and Madeira where there is an authorization. Nevertheless this manifestos are overseen and monitored by the Forest Authority.</p>
<p>points 62 and 63 – We disagree with the reference to "indigenous peoples", since it has no applicability in Portuguese territory</p> <p>Regarding the document, displayed in excel, in the tab:</p> <p>4.1. The references of this sheet must be:</p> <p>4.1.1. corrected the "Type of Evidence" field of line R94, related to the Atlas of Classified Heritage and in the Process of Classification, from "Statistics and Numbers" to "Geographic Information";</p> <p>4.1.2. included a new line of registration for the inclusion of the geoportal of the Archaeologist's Portal for which it is suggested: Abbreviated Name – Archaeology Geoportal; Name of the authors – Cultural Heritage, I.P.; Date – 2025; Title in Portuguese - Geoportal of the Archaeologist's Portal; Title – Geoportal of the Archaeologist's Portal; Link - https://pcip.maps.arcgis.com/apps/webappviewer/index.html?id=5cb4735d7d7743a39a16d7269a753a4a;</p> <p>Other comments – web map with archaeological heritage; Type of evidence - Geographic Information;</p> <p>Indicator - 63 4.2. In this form, the following legislation must be added: 4.2.1. the European Convention for the Protection of the Archaeological Heritage (revised), opened for signature in Valletta, Malta, on 16 January 1992 and ratified by the Portuguese State in the Resolution of the Assembly of the Republic No. 71/97;</p> <p>4.2.2. Decree-Law No. 164/2014, of 4 November, which approves the regulation of archaeological works.</p> <p>4.3. Evaluation of Indicators, in this sheet:</p> <p>4.3.1. Records "number" 47, 48, 49 and 67 - all references to "Indigenous peoples" should be deleted from the document, as they are not applicable in Portuguese territory</p> <p>References – At the moment only the World Heritage and the Atlas of Classified Heritage and in the Process of Classification are indicated. The Geoportal of the Archaeologist's Portal and the indication, as a reference, of the Municipal Master Plans and other surveys of cultural heritage should be included;</p>	<p>The reference to indigenous peoples is part of the indicators and therefore can't be redacted. The indicators that are only applicable to indigenous peoples are not applicable in Portugal, the ones that mention IP together with local communities are applicable but only to these.</p> <p>The suggested references were added and the type of evidence was corrected to other once "Geographic information" is not in the drop down list. The references to PDM that was suggested for indicator 63 was already identified in SNIT, that is the national territorial information system.</p>