



Centralized National Risk Assessment for Denmark

FSC-CNRA-DK V1-0 EN

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Risk assessments that have been finalized for Denmark

Controlled Wood categories		Risk assessment completed?
1	Illegally harvested wood	YES
2	Wood harvested in violation of traditional and human rights	YES
3	Wood from forests where high conservation values are threatened by management activities	YES
4	Wood from forests being converted to plantations or non-forest use	YES
5	Wood from forests in which genetically modified trees are planted	YES

Risk designations in finalized risk assessments for Denmark

Indicator	Risk designation (including functional scale when relevant)
Controlled wood category 1: Illegally harvested wood	
1.1	Low risk
1.2	N/A
1.3	Low risk
1.4	Low risk
1.5	N/A
1.6	Low risk
1.7	Low risk
1.8	Low risk
1.9	Low risk
1.10	Low risk
1.11	Low risk
1.12	Low risk
1.13	Low risk
1.14	N/A
1.15	N/A
1.16	Low risk
1.17	N/A
1.18	Low risk
1.19	Low risk
1.20	N/A
1.21	Low risk
Controlled wood category 2: Wood harvested in violation of traditional and human rights	
2.1	Low risk
2.2	Low risk
2.3	Low risk
Controlled wood category 3: Wood from forests where high conservation values are threatened by management activities	
3.0	Low Risk
3.1	Specified risk: Privately owned forests without a green management plan Low risk: All other forests
3.2	Low risk
3.3	Specified risk: Privately owned forests without a green management plan Low risk: All other forests
3.4	Low risk
3.5	Low risk
3.6	Low risk
Controlled wood category 4: Wood from forests being converted to plantations or non-forest use	

4.1	Low risk
Controlled wood category 5: Wood from forests in which genetically modified trees are planted	
5.1	Low risk

Risk assessments

Controlled wood category 1: Illegally harvested wood

Overview

Denmark has about 615,000 ha of forest (2013 data). This is equivalent to approximately 13% of the total area of Denmark. About 72% of the Danish forest area is forest reserves (fredskov). Forest reserves are covered by the Forest Act and shall be managed according to the law. Forest outside forest reserves can also be used for forest management, but are not covered by the Forest Act. All public forest is classified as forest reserve. An area can be removed from a forest reserve (rescinded) if this is requested by the relevant municipality. If an area is rescinded by the Minister of the Environment and Food, then another area of the same size shall be established as a forest reserve or planted. In some cases, new forest does not need to be planted; for example when the rescinded forest reserve is in a municipal area. Forests are used for timber production, but nature and recreational values are also important.

Forests in Denmark are divided into private forests (70%), and State and Municipal owners, 24%, trust funds or foundations, 4%, and unknown owners, 2%. State-owned forests include municipal forests. With regards to ownership, some Danish forests are classified as 'majoratsskov', which means that the ownership shall be kept as one property. Christmas trees are treated under the agricultural legislation; however, tax on production of Christmas trees is regulated in the Forest Act, article 30-31.

Forests classified as Natura 2000 forests (13% of the Danish forest area) require a harvest notification. Notification is made to the Danish Nature Agency, who then decides whether permission can be granted; with the decision taken on the proviso that the natural condition of the forest will not deteriorate. For other types of forest harvest, permits are not required by law.

Danish forestry is primarily regulated through the Forest Act. The Forest Act does not include many measures relating to forest management techniques, e.g. harvesting, planting or thinning. The elements of the forest that are not forest reserve and thus not covered by the Forest Act are covered by the Nature Protection Act. Denmark has a total harvest of 4.3 million cubic meters per year (<http://naturstyrelsen.dk/naturbeskyttelse/skovbrug/>).

The Danish Nature Agency under the Ministry of the Environment and Food is responsible for monitoring of Danish forests. A forest inventory was carried out in 2013 and, prior to that, in 2000 and 1990. This inventory describes statistical data for forest resources, forest health, biodiversity, and demography of the forestry.

Sources of legal timber in Denmark

Forest classification type	Permit/license type	Main license requirements (forest management plan, harvest plan or similar?)	Clarification
Forest reserve	N/A	N/A	Management plans are not required for Danish forests outside Natura 2000 areas.
Natura 2000	Notification needed	Notification to the Danish Nature Agency, who makes the decision	The notification will be responded to by the Danish Nature Agency.

Risk assessment

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
Legal rights to harvest			
1.1 Land tenure and management rights	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> • (VAT Act (Momsloven) - LBK nr 106 af 23/01/2013 - Article 1, 2, 3, 47 <p>https://www.retsinformat ion.dk/forms/R0710.aspx?id=145054</p> <ul style="list-style-type: none"> • Land Registration Law (Tinglysningsloven) - LBK nr 1075 af 30/09/2014 - Article 1-42b and 49b -66 	<p>Government sources</p> <p>www.retsinformation.dk (N.Y). Online database</p> <p>www.Datacvr.virk.dk/data (N.Y): VIRK. Online database.</p> <p>Non-Government sources</p> <p>Transparency.org (2016): Corruption Perceptions Index 2015. Available at: https://www.transparency.org/cpi2014/results. [Accessed on 22 December 2016].</p> <p>Personal communication with Danish Forest Association</p>	<p>Overview of Legal Requirements</p> <p>Land tenure rights are regulated by the Land Registration Law, with land ownership registered in the Land Book. According to the Land Registration Law, rights to real estate must be registered in the Land Book to ensure valid agreements on property and in cases of prosecution. When a document for land registration is to be registered, it shall include information on land registry number and address, personal identification number and company registration number. Apart from the registry in the Land Book, a legal contract of ownership shall also be signed.</p> <p>Customary rights and legal methods to obtain rights are equally regulated by the Land Registration Law. The Land Book is an online registry that is publicly available: https://www.tinglysning.dk/tinglysning/welcome.xhtml</p> <p>According to the Danish Forest Association, Denmark is one of the most highly organised countries in the context of spatial mapping, especially the forest area. Ownership is very clear.</p> <p>The Danish Forest Association does not know of any risks related to ownership. The State's right to obtain land tenure is regulated through the Expropriation Law. All legally registered companies are registered in the CVR register from which information on type of business, size, address etc. is publicly available. The CVR</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>https://www.retsinformat ion.dk/forms/R0710.aspx?id=142900</p> <ul style="list-style-type: none"> • Agreement Act (Aftaleloven) - LBK nr 781 af 26/08/1996 <p>https://www.retsinformat ion.dk/forms/R0710.aspx?id=82218</p> <ul style="list-style-type: none"> • Business Tax Law (Virksomhedsskatteloven) - LBK nr 1114 af 18/09/2013 <p>https://www.retsinformat ion.dk/forms/r0710.aspx?id=158215</p> <ul style="list-style-type: none"> • Det Centrale Virksomhedsregister (The Central Business Register) <p>https://datacvr.virk.dk/data/</p> <ul style="list-style-type: none"> • Bekendtgørelse af lov om fremgangsmåden ved ekspropriation vedrørende fast ejendom 		<p>number can be verified at Virk: https://datacvr.virk.dk/data/. A legal business agreement is also a requirement.</p> <p>Description of Risk</p> <p>Land rights are clearly established in Denmark and business and tax registration are clear and transparent through public databases. Furthermore, laws in Denmark are very well enforced. In Transparency International's Corruption Perceptions Index, Denmark was ranked first for the years 2015, 2014, 2013 and 2012; that is, for these years, Denmark was considered the least corrupt country in the world.</p> <p>Within the Worldwide Governance Indicators index, Denmark scores close to 100% for Rule of Law and Control of Corruption. This indicates that there is very low risk that legislation on ownership and legal registration of businesses is not enforced.</p> <p>Risk Conclusion</p> <p>Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the authorities and/or by the relevant entities ("Low risk" threshold (1) is met).</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>https://www.retsinformat ion.dk/forms/R0710.aspx?id=121921</p> <p>Legal Authority</p> <ul style="list-style-type: none"> • Ministry of Taxation • Ministry of Justice <p>Legally required documents or records</p> <ul style="list-style-type: none"> • Registry in the Land Book • Contract of ownership • legal business agreement 		
1.2 Concession licenses	Not Applicable. There is no legislation covering concessions in Denmark	N/A	N/A
1.3 Management and harvesting planning	Applicable laws and regulations	Government sources www.https://www.retsinformation.dk (N.Y). Online database	Overview of Legal Requirements Natura 2000 forest plans are regulated through Article 4 of the Forest Act. The Forest Act requires that forest plans for these areas shall be developed by the Minister for the Environment and Food. As the basis for the forest plan, the Minister for the

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<ul style="list-style-type: none"> • Forest Act (Skovloven) - LBK nr 678 af 14/06/2013 <p>https://www.retsinformat ion.dk/forms/R0710.aspx?id=143280</p> <ul style="list-style-type: none"> • Museum Act (Museumsloven) - LBK nr 358 af 08/04/2014 - Article 1-2, 8, 23-31, 38-40a, 41-45 <p>www.retsinformation.dk/forms/R0710.aspx?id=162504</p> <ul style="list-style-type: none"> • Nature Protection Act (Naturbeskyttelsesloven) - LBK nr 1578 af 08/12/2015 <p>https://www.retsinformat ion.dk/forms/r0710.aspx?id=155609</p> <p>Legal Authority</p> <ul style="list-style-type: none"> • Ministry of Environment and Food 	<p>Non-Government sources</p> <p>Personal communication with Danish Forest Association, Denmark's Society for Nature Conservation and Danish Nature Agency</p>	<p>Environment and Food shall register and map the location and conservation status of all relevant species in the area. This forest plan is not to be confused with a forest management plan.</p> <p>Private forest owners are not required to develop a forest management plan. However, private forest managers can apply for subsidies if performing specific environmental actions, in which case they are required to have a forest management plan. The forest management plan does then need to be approved by the forest administration to obtain the subsidy (Forest Act, Articles 3-6).</p> <p>All State-owned forests have a forest management plan. 'Fredskov' is a Danish concept relating to forest reserves; and forests can be designated a forest reserve by the Minister of the Environment or by registration in the Land Book. Ninety per cent of all Danish forests are classified as 'fredskov' (see http://www.dn.dk/Default.aspx?ID=8740).</p> <p>The Museum Act provides legal requirements for protection of cultural and natural heritage through the planning and preparation of earthworks, including archaeological and natural history assessments. Risk assessments are important in forest management as many natural heritage values occur in Danish forests. In forests in Denmark, there are more and better-preserved ancient monuments and burial mounds than in cleared land, where they have been removed to give way to agriculture. The Nature Protection Act requires that there shall be a 100 meter zone around each monument. Within this zone various obligations must be met, for example, fences for forestry use cannot occur, and logging residues cannot be left. According to the Danish Forest Association, there have been few cases of logging residues left within this zone, and one case where a forest owner dug a foxhole in a burial mound. However, these are considered exceptional and it is not the general picture that the Museum Act is being violated inside the forests.</p> <p>According to the Forest Act, the Minister for the Environment and Food shall monitor the state of the forests and development of the forest industry. The Danish Nature Agency carries out monitoring of businesses considered to have a high risk of offending against the law. This means that the Agency mainly visits forest owners, where there is a known case of offending. The Minister shall also ensure that statistical data are collected on a regular basis and that reports are developed about the state of Danish forests. The Minister can determine requirements as to how monitoring and data collection are carried out (Forest Act, Articles 35-36). These</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<ul style="list-style-type: none"> Ministry of Culture <p>Legally required documents or records</p> <p>N/A</p>		<p>tasks are carried out under the auspices of Forest & Landscape, a centre of the Department of Earth Science and Nature Management and the Department of Food and Resource Economics.</p> <p>The purposes of forest monitoring are to: follow changes in forest growth and condition and relate them to human as well as natural influences; monitor forest resources and forest production; provide the knowledge base for operational as well as natural and environmental strategic decisions; provide national and international reports. For the latest results of forest monitoring, refer http://ign.ku.dk/samarbejde-raadgivning/myndighedsbetjening/skovovervaagning</p> <p>Description of Risk</p> <p>Forest management plans are not a requirement for Danish forests. Forest monitoring is only for statistical purposes; conformance with the law is not monitored. According to both Danish Nature Agency and Denmark's Society for Nature Conservation, the Danish Nature Agency only monitors companies involved with import of timber, but not forest management units. This represents a risk. However, it is confirmed by Danish Nature Agency; Denmark's Society for Nature Conservation; and Danish Forest Association, that Danish forest managers in general have a very high level of legal compliance. This is explained by the fact that Danish forests are generally visible to visitors and neighbours, so it is difficult for the forest owners to carry out illegal activities without these being observed.</p> <p>Risk Conclusion</p> <p>Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the 'authorities and/or by the relevant entities ("Low risk" threshold (1) is met).</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
1.4 Harvesting permits	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> • Forest Act (Skovloven) - LBK nr 678 af 14/06/2013, §17 • Nature Protection Act (Naturbeskyttelsesloven) - LBK nr 1578 af 08/12/2015, §19 <p>https://www.retsinformat ion.dk/forms/R0710.aspx?id=143280</p> <p>https://www.retsinformat ion.dk/forms/r0710.aspx?id=155609</p> <p>Legal Authority</p> <p>N/A</p> <p>Legally required documents or records</p>	<p>Government Sources</p> <p>Svana.dk (N.Y)a: Anmeldeordning Natura 2000 – fredskovsarealer. Miljø- og fødevarsestyrelsen. Styrelses for Vand og Naturforvaltning. Available at: http://svana.dk/natur/natura-2000/anmeldeordning-i-natura-2000-omraader/fredskovsarealer/. [Accessed on 22 December 2016].</p> <p>Svana.dk (N.Y)b: Anmeldeordning - anden jord end fredskovsarealer. Miljø- og fødevarsestyrelsen. Styrelses for Vand og Naturforvaltning. Available at: http://svana.dk/natur/natura-2000/anmeldeordning-i-natura-2000-omraader/ikke-fredskovsarealer/. [Accessed on 22 December 2016].</p> <p>Personal Communication Danish Forest Association and Danish Nature Agency.</p>	<p>Overview of Legal Requirements</p> <p>Harvesting in- and outside of forest reserves does not require a harvesting permit</p> <p>However, logging to be conducted within Natura2000 areas is covered by a notification system. Forest managers are to notify the authorities if certain types of activities are to be conducted within Natura2000 areas.</p> <p>The Nature Protection Act regulates areas outside the forest reserve, and the Forest Act regulates harvesting of Natura2000 areas within the forest reserve.</p> <p>Forest reserve</p> <p>The Nature Agency are to be notified 4 weeks prior to harvest of hardwood forest; promotion of coniferous trees in the deciduous forest and new establishment of intensive production of greenery, Christmas trees, etc., which require the use of inputs (fertilizers and pesticides). The nature Agency will consider whether the activities can damage the Natura2000 values and are to give notice within 4 weeks. If there has been no notification from the Nature Agency harvesting can proceed.</p> <p>Outside forest reserve</p> <p>In case of harvesting related activities forest owners will have to notify the Municipality about clearing and tree species change 4 weeks prior to harvesting. The Municipality will have to assess the case within 4 weeks. If no notification is received back from the Municipality, then harvesting can proceed.</p> <p>Description of risk</p> <p>According to the Danish Forest Association and Danish Nature Agency, there has been incidents of a forest owner cutting dead Ash trees within a Natura 2000 area without first notifying the Nature Agency. However, notifications have in these cases been granted retrospectively when applied for, as these are rare cases and not considered to be a significant risk by the Nature Agency.</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	N/A		<p>Risk Conclusion</p> <p>Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the 'authorities and/or by the relevant entities ("Low risk" threshold (1) is met).</p>
Taxes and fees			
1.5 Payment of royalties and harvesting fees	<p>Applicable laws and regulations</p> <p>N/A. In Denmark there are no royalties and harvesting fees required in relation to harvest.</p> <p>Legal Authority</p> <p>N/A</p> <p>Legally required documents or records</p> <p>N/A</p>	N/A	N/A
1.6 Value added taxes and other sales taxes	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> • Law of VAT (Momsloven) - LBK nr 	<p>Government sources</p> <p>Personal communication with Danish Nature Agency</p>	Overview of Legal Requirements

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>106 af 23/01/2013 - Article 11, 70, 81</p> <p>www.retsinformation.dk/forms/R0710.aspx?id=145054</p> <ul style="list-style-type: none"> • Tax Collection Act (Optrævningsloven) - LBK nr 569 af 28/05/2014 <p>www.retsinformation.dk/forms/R0710.aspx?id=163005</p> <ul style="list-style-type: none"> • Corporation Tax Act (Selskabsskatteloven) - LBK nr 680 af 20/05/2015 <p>www.retsinformation.dk/Forms/R0710.aspx?id=169477</p> <ul style="list-style-type: none"> • Business Tax Law (Virksomhedsskatteloven) - LBK nr 1114 af 18/09/2013 <p>www.retsinformation.dk/</p>	<p>Non-Government sources</p> <p>Info.worldbank.org (2016): Worldwide Governance Indicators – Denmark. Available at: http://info.worldbank.org/governance/wgi/index.aspx#reports. [Accessed on 22 December 2016].</p>	<p>VAT of 25% shall be paid in accordance with the Tax Collection Act and the VAT Law. Sales tax shall be paid on a monthly basis; and is administered by the Ministry of Taxation and applies to persons who conduct an independent business.</p> <p>Description of Risk</p> <p>The Danish Nature Agency confirms that some illegalities occur associated with firewood sold directly from the forest management unit. However, this firewood does not end up on the commercial market, and represents a very limited volume. Denmark scores high against World Bank Worldwide Governance Indicators. On a scale of -2.5 to +2.5, Denmark receives a score of 1.73 (2015) for Regulatory Quality, 2.04 for Rule of Law and 2.23 for Control of Corruption. Regulation of sales tax and VAT is considered well-enforced in Denmark.</p> <p>Risk Conclusion</p> <p>Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the 'authorities and/or by the relevant entities ("Low risk" threshold (1) is met).</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>forms/R0710.aspx?id=158215</p> <p>www.retsinformation.dk/Forms/R0710.aspx?id=145909</p> <p>Legal Authority</p> <ul style="list-style-type: none"> • <i>Ministry of Taxation</i> <p>Legally required documents or records</p> <p>N/A</p>		
1.7 Income and profit taxes	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> • Law of VAT (Momsloven) (LBK nr 106 af 23/01/2013) - Article 1,2,3 <p>www.retsinformation.dk/forms/R0710.aspx?id=145054</p>	<p>Government sources</p> <p>SKAT.dk (N.Y): C.C.4.3.4. Skovbrug. Available at: http://www.skat.dk/SKAT.aspx?oID=2047189. [Accessed on 22 December 2016].</p> <p>Non-Government sources</p> <p>Skovdyrkerne (2008): Skov og SKAT. Available at: http://www.skovdyrkerne.dk/omos/nyh</p>	<p>Overview of Legal Requirements</p> <p>Income tax for companies is calculated from income and - when companies are legally registered - paid automatically through bank accounts. Tax regulations also include penalties and provisions for sanctions.</p> <p>Income tax has to be paid based on the value of the sold timber. Costs incurred in relation to the forest operation can be deducted from income tax (SKAT.dk (N.Y)). Tax deductions allowed in forestry are described in tax Assessment Act article (Ligningsloven) 8K. The Tax Assessment Act gives requirements on how income tax to the state is calculated.</p> <p>Tax authorities require that there is a correlation between the income covered by the tax regulation and the expenses being claimed as a tax deduction; thus only expenses that can be deducted are those that are used to gain, ensure and maintain income.</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>• Tax Collection Act (Oprævningsloven) LBK nr 569 af 28/05/2014</p> <p>www.retsinformation.dk/forms/R0710.aspx?id=163005</p> <p>•Corporation Tax Act (Selskabsskatteloven) LBK nr 680 af 20/05/2015</p> <p>www.retsinformation.dk/Forms/R0710.aspx?id=169477</p> <p>•Virksomhedsskatteloven (Law on Business Tax) - LBK nr 1114 af 18/09/2013</p> <p>www.retsinformation.dk/forms/R0710.aspx?id=158215</p> <p>• Personskatteloven (Personal Tax Act) -</p>	<p>eder.nyhed/artikel/skov-og-skat/. [Accessed 22 December 2016].</p> <p>Transparency.org (2016): Corruption Perceptions Index 2015. Available at: https://www.transparency.org/cpi2014/results. [Accessed on 22 December 2016].</p> <p>Info.worldbank.org (2016): Worldwide Governance Indicators – Denmark. Available at: http://info.worldbank.org/governance/wgi/index.aspx#reports. [Accessed on 22 December 2016].</p>	<p>Costs associated with planting of forest reserves, Christmas trees, and greenery and fruit trees can be deducted by up to 20% annually. It is a condition of deduction that, for the area planted as a forest reserve, duty is imposed through the provisions of the Forest Act, and that the forest reserve obligation is recorded in the Land Book and cadastral map. Costs of reforestation can be deducted immediately. Expenditure incurred for the construction of shelterbelts and additional hardwood shelter plantings is fully deductible from taxable income in the income year in which the expense is incurred. The purchase of forest machinery and equipment and real estate in relation to forestry activity can be deducted or amortized only under the provisions of the Tax Assessment Act relating to tax depreciation.</p> <p>Description of Risk</p> <p>According to the Danish Forest Association, some small-scale forest owners do not register all firewood sales and thus do not pay the required tax. However, this is a very limited volume of wood that does not enter the commercial timber chain.</p> <p>Denmark scores high against World Bank Worldwide Governance Indicators. On a scale of -2.5 to +2.5, Denmark receives a score of 1.73 (2015) for Regulatory Quality, 2.04 for Rule of Law and 2.23 for Control of Corruption. Regulation of income tax is considered well-enforced in Denmark.</p> <p>Risk Conclusion</p> <p>Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the 'authorities and/or by the relevant entities ("Low risk" threshold (1) is met).</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>LBK nr 382 af 08/04/2013</p> <p>www.retsinformation.dk/Forms/R0710.aspx?id=145909</p> <ul style="list-style-type: none"> • Bekendtgørelse af lov om påligningen af indkomstskat til staten (ligningsloven)1) - LBK nr 1081 af 07/09/2015, article 8, K. <p>https://www.retsinformation.dk/forms/r0710.aspx?id=173414</p> <p>Legal Authority</p> <ul style="list-style-type: none"> • Ministry of Taxation <p>Legally required documents or records</p> <p>N/A</p>		
Timber harvesting activities			

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
1.8 Timber harvesting regulations	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> • Forest Act (Skovloven) - LBK nr 678 af 14/06/2013 <p>https://www.retsinformation.dk/forms/R0710.aspx?id=143280</p> <ul style="list-style-type: none"> • Water Course Act (Vandløbsloven) - LBK nr 1579 af 08/12/2015 <p>Legal Authority</p> <ul style="list-style-type: none"> • Ministry of the Environment and Food <p>Legally required documents or records</p> <p>N/A</p>	<p>Government sources</p> <p>Personal communication with Danish Forest Association and Danish Nature Agency</p>	<p>Overview of Legal Requirements</p> <p>Specific requirements for forest activities within forest reserves are stipulated in the Forest Act, Article 8, which states that the area shall have a continuous forest cover. Harvest (except for thinning) shall not take place before the forest, or any tree, has reached the age of harvest maturity. No more than ten years after harvest or thinning, the area shall again be forested. Animal husbandry is prohibited in forest reserves.. The Forest Act further sets legal specifications on how the non-protected forest reserves shall be managed. This includes the following: Coppice and grazing forest together comprises up to 10 percent of the forest area. If animals are kept in the forest with the purpose of grazing, the fencing of these animals shall not limit public access and stay. Areas where Christmas trees and ornamental greenery are grown must not comprise more than 10% of the area. It is prohibited to construct buildings, set up facilities, implement landscape change or leave waste. However, sheds not more than 10 square meters and construction or landscape changes necessary for forest management are exempt. Drainage systems and bridges are covered in the Water Course Act. Denmark has a relatively limited area of commercial forest, which is the reason that detailed legal requirements for harvest activities are not present in the Forest Act.</p> <p>Description of Risk</p> <p>Other risks related to forest management techniques are trees felled before harvest maturity, but this is rarely seen according to both the Danish Nature Agency and Danish Forest Association. Instances are known of nest trees being felled, for which court cases occur According to the Danish Nature Agency, however, there is not more than one case per year meaning that this is not a significant risk.</p> <p>The requirements for actual forest management are limited in non-protected forest reserves in Denmark. Furthermore, a large proportion of Danish forests are not managed for timber harvest but for environmental, biodiversity or recreational values. Therefore violation of the legislation relating to timber harvesting does not present a significant risk.</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
			<p>Risk Conclusion</p> <p>Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the 'authorities and/or by the relevant entities ("Low risk" threshold (1) is met).</p>
1.9 Protected sites and species	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> • Nature Protection Act (Naturbeskyttelsesloven) - LBK nr 951 af 03/07/2013 - especially Article 17, Article 19 <p>www.retsinformation.dk/forms/R0710.aspx?id=155609</p> <ul style="list-style-type: none"> • Forest Act (Skovloven) - LBK nr 678 af 14/06/2013 - Article 14-28 <p>https://www.retsinformation.dk/forms/R0710.aspx?id=143280</p>	<p>Government sources</p> <p>Naturstyrelsen (2013): Forvaltningsplan for flagermus. naturstyrelsen, Miljøministeriet. Available at: http://svana.dk/media/207420/flagermus_forvaltningsplan_2013_web.pdf . [Accessed on 22 december 2916].</p>	<p>Overview of Legal Requirements</p> <p>For areas covered by Natura 2000, the following management activities shall be notified to the authorities prior to harvesting: clear felling of hardwood forest, planting of deciduous forest, promotion of conifers in broadleaf forest, establishment of intensive production of greenery such as Christmas trees, use of auxiliary substances (fertilizers and pesticides), construction of industry facilities, or changes to drainage conditions (Forest Act, Article 17). In 2012 the Danish Nature Agency adopted a series of action plans for implementation of Natura 2000. Article 19 of the Forest Act regulates international nature protection, including Natura 2000 areas. The Species Conservation Notice 4 lists protected reptiles, amphibians, fish, invertebrates and plants in Denmark. The forest manager is obliged to protect protected species if he is aware of their presence in his forest. He will then make sure that the prescribed care is taken. This is especially relevant for birds nesting in the trees and for woodpeckers and bats. The Forest Act describes all requirements for the protected species.</p> <p>The Minister of Food and Environment are to map Natura2000 areas (§15) and can furthermore choose to include other naturally valuable forests (§25) The forest owner/manager is not obliged to map protected sites and species.</p> <p>Description of Risk</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<ul style="list-style-type: none"> • Species conservation notice: www.retsinformation.dk/forms/R0710.aspx?id=12563 • Hunting and Game Management Act (Jagt- og Vildtforvaltningsloven) - LBK nr 735 af 14/06/2013 www.retsinformation.dk/forms/r0710.aspx?id=143627 • The Order on Designation and Management of International Nature Protection Areas and Protection of Certain Species (Bekendtgørelse om udpegning og administration af internationale naturbeskyttelsesområder samt beskyttelse af visse arter) - BEK nr 1828 af 16/12/2015 		<p>In the past, there have been issues with registration of particularly valuable natural assets, which according to the Forest Act should be mapped. The mapping of such assets has only recently started and should be completed by 2019. Damaging protected sites and species are not considered to be a legal violation if the forest manager is not aware of their presence. The damage of known protected sites and species is not considered to be a systematic and large scale issue.</p> <p>Risk Conclusion</p> <p>Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the 'authorities and/or by the relevant entities ("Low risk" threshold (1) is met).</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>Legal Authority</p> <ul style="list-style-type: none"> • Ministry of the Environment and Food <p>Legally required documents or records</p> <p>N/A</p>		
1.10 Environmental requirements	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> • Forest Act (Skovloven) - LBK nr 678 af 14/06/2013 • Environmental protection Act (Miljøbeskyttelsesloven) - LBK nr 879 af 26/06/2010 <p>https://www.retsinformation.dk/forms/R0710.aspx?id=143280</p> <p>www.retsinformation.dk/forms/R0710.aspx?id=1</p>	<p>Government sources</p> <p>www.retsinformation.dk (N:Y). Online database.</p> <p>Personal Communication: Denmark's Society for Nature Conservation</p>	<p>Overview of Legal Requirements</p> <p>The Forest Act: The law aims to preserve and protect Denmark's forests and increase the forest area. The law also aims to promote sustainable management of the country's forests. Management and administration of the forests should promote resilient forests, ensure forest production, conserve and enhance forest biodiversity and ensure that landscapes, natural history, cultural history, environmental protection and outdoor recreation can be accommodated.</p> <p>The Environmental Protection Act sets requirements for protection of nature and the environment, so that society can develop on a sustainable basis while respecting human quality of life and protecting animal and plant life.</p> <p>The Environmental Impact Assessment (EIA) statutory order requires assessments, under the Planning Act, of the impact of certain public and private installations on the environment.</p> <p>The Environmental Damage Act aims to ensure that the person responsible for environmental damage or an imminent threat of environmental damage prevents and alleviates the damage or danger and bears all costs thereof.</p> <p>The Ochre Act sets up legal requirements for digging of trenches, which is also relevant to forestry in Denmark.</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>32218</p> <ul style="list-style-type: none"> EIA Notice (VVM-bekendtgørelsen) - BEK nr 1184 af 06/11/2014 <p>www.retsinformation.dk/forms/R0710.aspx?id=165403</p> <ul style="list-style-type: none"> Environmental Damage Act (Miljøskadeloven) - LBK nr 916 af 03/07/2015 <p>https://www.retsinformation.dk/forms/R0710.aspx?id=173182</p> <ul style="list-style-type: none"> Ochre Act (Okkerloven) - LBK nr 934 af 24/09/2009 <p>www.retsinformation.dk/forms/R0710.aspx?id=127107</p> <ul style="list-style-type: none"> Planning Act (Planloven) - LBK nr 		<p>The objective of the Planning Act is to ensure that planning takes into account society's interests in land use and contributes to protecting Denmark's nature and environment, so that society can develop on a sustainable basis respecting human quality of life and protecting animal and plant life.</p> <p>The Water Course Act regulates all watercourses in Denmark, including ditches, canals, pipelines and drainage systems as well as lakes, ponds and other similar inland waters.</p> <p>Description of Risk</p> <p>According to the Forest Act, only shelters smaller than 10 square meters can be built in forest reserves. The Danish Nature Agency has reviewed aerial photos to control the size of the buildings and this does not represent an important risk. According to the Forest Act (Article 28), open areas of less than 0.25 ha must not be destroyed and shall be maintained; however this requirement is very poorly enforced. However, as the areas are very limited it does not represent any important risk in Danish forestry.</p> <p>The use of chemicals is limited to Christmas tree production (an enterprise that can cover up to 10% of a forest reserve). According to Denmark's Society for Nature Conservation, there are some problems with the use of chemicals within the Christmas tree industry, where prohibited chemicals might be used and legal amounts exceeded. However, most Christmas tree production takes place on agricultural land, and not in the small plots in the forest reserves. Therefore, the use of chemicals within the Christmas tree industry does not represent an important risk within the forest industry.</p> <p>Risk Conclusion</p> <p>Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the 'authorities and/or by the relevant entities ("Low risk" threshold (1) is met).</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>587 af 27/05/2013: Article 1-4, 10a-38, 51-70</p> <p>https://www.retsinformation.dk/forms/r0710.aspx?id=144425</p> <ul style="list-style-type: none"> • Water Course Act (Vandløbsloven) - https://www.retsinformation.dk/forms/r0710.aspx?id=145855 <p>Legal Authority</p> <ul style="list-style-type: none"> • Ministry of the Environment and Food <p>Legally required documents or records</p> <p>N/A</p>		
1.11 Health and safety	Applicable laws and regulations	Non-Government sources	Overview of Legal Requirements

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>• Working Environment Act (Arbejds miljøloven) - LBK nr 1072 af 07/09/2010</p> <p>https://www.retsinformat ion.dk/forms/r0710.aspx?id=133159</p> <p>Legal Authority</p> <ul style="list-style-type: none"> • Ministry of Employment • Labour Inspectorate <p>Legally required documents or records</p> <p>N/A</p>	<p>Det Nationale Forskningscenter for Arbejds miljø (NFA) (2016: Danskernes Arbejds miljø 2014. Available at: http://www.arbejds miljoforskning.dk/~ /media/Boeger-og-rapporter/AH-2014okt-final-version.pdf. [Accessed 22 December 2016].</p> <p>Arbejds miljøforskning (2013): Diagram: Branchegrupper: Landbrug, skovbrug og fiskeri (Online). Available at: http://www.arbejds miljoforskning.dk/da /arbejds miljoe data/arbejds miljoe-og-helbred-20/arbejds miljoeet-i-tal/alle-svar-for-branchegrupper/diagram?group=Branc he36_018. [Accessed on 22 December 2016].</p> <p>Arbejdstilsynet (2014): Arbejdsulykker. Arbejdstilsynets årsopgørelse 2013.</p> <p>Personal communication with Anne Marie Hagelskjær Smit from Gls-arbejsgiver.dk</p>	<p>The Work Environment Act aims to create a safe and healthy work environment at all times in accordance with society’s technical and social development. The Act is the basis for companies to resolve health and safety issues with guidance from social organizations and guidance and control by the Labour Inspectorate.</p> <p>The employer has to ensure that working conditions are acceptable according to health and safety, and has to develop a written assessment of the health and safety of the working environment (in Danish; arbejdsmarkedspladsvurdering, APV). The type of work and the size of organization must be considered, and the APV shall be revised either when organizational changes occur or every third year. The APV shall be accessible for management, employees and the supervision authorities.</p> <p>Description of Risk</p> <p>According to statistics from the Labour Inspectorate, forestry work – together with agriculture –has a high risk of work-related accidents, but lower than (e.g.) construction, slaughterhouse, water, or sewer work (Arbejdstilsynet 2014). Companies are required to make an evaluation of their work place, but both companies and individual entrepreneurs are subject to health and safety legislation, and can be controlled by the Labour Inspectorate.</p> <p>An assessment of work environments for a variety of industries was carried out in Denmark 2014. The forestry industry was placed in a joint category with agriculture and fisheries; and as a whole performed better than the mean when responding to the statements “the management always encourages safety at work” and “[Management provides] guidance and instruction for safe execution”, which indicates sufficient enforcement of the Work Environment Act. In the same assessment, respondents indicated that minor accidents are an accepted part of the work.. However, no evidence was found that the law was not enforced (National Research Centre for the Working Environment 2014). The study on the working environment showed no issues of violation of health and safety legislation.</p> <p>In general there is a relatively strong focus on the work environment and safety in Denmark. The employer is required by the Work Environment Act to correctly instruct the workers on the use of (e.g.) machinery. According to the Danish Forest Association there may be cases where this obligation is not respected. However, in</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
			<p>general, according to both the Danish Forest Association and the Danish Nature Agency, accidents occurring in Danish forestry are not related to violation of the law. In general the risk is also low because employees in Denmark are aware of their rights and of the legislation related to health and safety.</p> <p>Risk Conclusion</p> <p>Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the 'authorities and/or by the relevant entities ("Low risk" threshold (1) is met).</p>
1.12 Legal employment	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> • Working Environment Act (Arbejds miljøloven) - LBK nr 1072 af 07/09/2010 <p>https://www.retsinformat ion.dk/forms/r0710.aspx?id=133159</p> <ul style="list-style-type: none"> • Act on equal treatment of men and women in occupational social security schemes (Bekendtgørelse af lov om ligebehandling af mænd og kvinder inden for de erhvervstilknyttede 	<p>Non-Government sources</p> <p>Denskemodel.dk (2013): Arbejdspladser Uden Overenskomst. 21. October 2013. Available at: http://www.danskemodel.dk/overenskomster/arbejdspladser-uden-overenskomst. [Accessed on 22 December 2016].</p> <p>Personal communication with Danish Forest Association</p>	<p>Overview of Legal Requirements</p> <p>The Act relating to equal treatment of men and women ensures equal treatment of men and women in the occupational schemes and covers the working population, including self-employed, workers who are temporarily out of work due to illness, maternity, accident or involuntary unemployment and persons seeking employment, and retired and disabled workers. The law is also applicable in relation to insurance and related financial services.</p> <p>According to the Holiday Act, holidays and payments for employees are regulated. An employee is entitled to holiday pay or salary during holidays.</p> <p>In Denmark there are strict rules as to types of work and working hours for youth, with dangerous work not allowed for children aged 15 years or younger. There is no minimum wage in Denmark.</p> <p>Description of Risk</p> <p>In Denmark there is relatively high enforcement of work environment regulation, for safety, minimum age of work, and hazardous work. Most employees in Denmark are covered by a collective agreement. Companies covered by a collective agreement shall follow the law.</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>sikringsordninger) - LBK nr 950 af 14/08/2015</p> <p>https://www.retsinformat ion.dk/forms/r0710.aspx?id=168655</p> <ul style="list-style-type: none"> • Holidays Act (FerieLov) - LBK nr 202 af 22/02/2013 <p>https://www.retsinformat ion.dk/forms/r0710.aspx?id=145329</p> <ul style="list-style-type: none"> • Law on Labour and Industrial Arbitration (Lov om arbejdsret og faglige voldgiftsretter) - LOV nr 106 af 26/02/2008 <p>https://www.retsinformat ion.dk/forms/r0710.aspx?id=115370</p> <ul style="list-style-type: none"> • Salaried Employees Act (Funktionærloven) - LBK nr 81 af 03/02/2009 		<p>Danish forests are permitted to cover an area up to 10% with Christmas trees. Within the Christmas tree industry, there are – according to Denmark's Society for Nature Conservation – problems with illegal employment of staff from Eastern Europe. However in forests with requirements for long-term management, this is not reported to be an issue. As Christmas trees will not be sold and used in further wood processing, the risk is not considered relevant in relation to this risk assessment.</p> <p>Risk Conclusion</p> <p>Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the 'authorities and/or by the relevant entities ("Low risk" threshold (1) is met).</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>https://www.retsinformat ion.dk/forms/r0710.aspx?id=123029</p> <ul style="list-style-type: none"> • Notice of ILO Convention (Bekendtgørelse af ILO-konvention nr. 151) - BKI nr 58 af 02/06/1982 <p>https://www.retsinformat ion.dk/Forms/R0710.aspx?id=84794</p> <ul style="list-style-type: none"> • Act on posting of employees, etc. (Bekendtgørelse af lov om udstationering af lønmodtagere m.v.) - LBK nr 342 af 03/04/2014 <p>https://www.retsinformat ion.dk/forms/r0710.aspx?id=161810</p> <p>Legal Authority</p> <ul style="list-style-type: none"> • Ministry of Employment 		

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<ul style="list-style-type: none"> • Ministry of Business and Growth • Ministry of Foreign Affairs <p>Legally required documents or records</p> <p>N/A</p>		
Third parties' rights			
1.13 Customary rights	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> • Nature Protection Act (Naturbeskyttelsesloven) - LBK nr 951 af 03/07/2013: article 23, Access to forests <p>www.retsinformation.dk/forms/R0710.aspx?id=155609</p> <ul style="list-style-type: none"> • Notice of public access to move and stay in the wild (Bekendtgørelse om offentlighedens adgang 	<p>Government sources</p> <p>Svana.dk (N.Y): Hvad må jeg samle? Available at: http://svana.dk/natur/friluftsliv/hvad-maa-jeg-i-naturen/hvad-maa-jeg-samle/. [Accessed 22 December 2016].</p> <p>Skog og Naturstyrelsen (2005): Naturen må gerne betrædes. Men træd varsomt. Available at: http://naturstyrelsen.dk/media/nst/Attachments/naturen_maa_gerne.pdf. [Accessed 22 December 2016].</p> <p>Personal communication with Danish Nature Agency</p>	<p>Overview of Legal Requirements</p> <p>According to the Nature Protection Act, article 23 the public has the right to access both public and private forest by foot, bicycle and horseback (except areas used by the military). In public forests, access is permitted to the entire forest area, while the public has a right to private forests only by roads or trails from 6am until sunset. Fencing out or restricting public access is not permitted. A private forest owner is able to restrict access by bicycles and horseback riding, even though such restriction in certain cases can be overruled by the municipality.</p> <p>Gathering of mushrooms, berries and mosses in all forests for private use is permitted, but only in limited amounts (BEK nr 1317 af 21/12/2011, §28). In private forests, however, only what can be reached from the roads or trails may be collected. It is permitted to cut branches from deciduous trees above 10 meters, while branches may be collected from both deciduous and coniferous trees that are dead. Firewood can be collected only with a license, which can be obtained at the Danish Nature Agency.</p> <p>Description of Risk</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>til at færdes og opholde sig i naturen) - BEK nr 1317 af 21/12/2011, article 28</p> <p>https://www.retsinformat ion.dk/Forms/R0710.aspx?id=139348</p> <p>Legal Authority</p> <ul style="list-style-type: none"> • Ministry of Environment and Food <p>Legally required documents or records</p> <p>N/A</p>	<p>Non-Government sources Friluftsrådet (2014) Gener i naturen. Danskernes brug af naturen og omfanget af generende oplevelser i mødet med andre brugere. Asbjørn Jensen. September 2014. Available at: http://www.friluftsradet.dk/media/974418/rapport_danskernes_brug_af_naturen.pdf. [Accessed on 22 December 2016].</p>	<p>There are a few cases of conflict occurring between private forest owners and people accessing the forests (personal communication); for example, a private forest owner not wanting to allow access to their private land. Such cases are being reported to and dealt with by the municipality. Often these cases are resolved after the legislation and requirements are clarified with the forest owners or the public users of the forests. The cases are rarely brought to court. According to a 2014 report from the Outdoor Council, 25% of Danes have to some degree been 'bothered' when they are in a natural setting, but primarily this relates to other users, dogs or the presence of garbage. There are no indications of systemic conflicts with forest owners; with the same report stating that 97% are happy with their visit to the forests and mainly use the forest for recreational purposes.</p> <p>Risk Conclusion</p> <p>Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the 'authorities and/or by the relevant entities ("Low risk" threshold (1) is met).</p>
1.14 Free prior and informed consent	<p>Applicable laws and regulations</p> <p>N/A. There is no legislation covering Free, Prior and Informed Consent, therefore this indicator is Not Applicable.</p>	N/A	N/A

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
1.15 Indigenous peoples rights	<p>Applicable laws and regulations</p> <p>N/A. As this assessment relates only to Denmark (without Greenland and Faeroe Islands), it is not relevant to Indigenous people.</p> <p>Legal Authority</p> <p>N/A</p> <p>Legally required documents or records</p> <p>N/A</p>	N/A	N/A
Trade and transport			
1.16 Classification of species, quantities, qualities	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> Act on classification of wood sold under certain conditions (Lov om sortering af råtræ der 	<p>Personal Communication: Danish Nature Agency and Danish Forest Association</p> <p>Non-Government sources byggewiki.dk (2011): Konstruktionstræ. Available at:</p>	<p>Overview of Legal Requirements</p> <p>The Act on Classification of Wood Sold Under Certain Conditions regulates classification of harvested material. The regulation provides material classifications and quality category names. The Act specifies requirements for measuring, and sorting by dimension and quality. Trees must be sorted by species and usual product type (e.g. plank logs, sleeper logs, full-length timber, impregnation masts, piles, box</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>forhandles under visse betegnelser) - LOV nr 535 af 13/12/1972</p> <p>https://www.retsinformat ion.dk/forms/R0710.aspx?id=79824</p> <p>Legal Authority</p> <ul style="list-style-type: none"> • Ministry of the Environment and Food <p>Legally required documents or records</p> <p>N/A</p>	<p>http://byggewiki.dk/Konstruktionstr%C3%A6. [Accessed 22 December 2016].</p>	<p>wood, chip wood etc.). All wood classified under this Act shall be marked with A/EØF, B/EØF or C/EØF, etc., indicating the quality. These designations show that the wood has been classified according to the law.</p> <p>Description of Risk</p> <p>Trade in Danish-produced wood material is well-regulated and – according to both Danish Nature Agency and Danish Forest Association – there is no known corruption associated with this requirement.</p> <p>Risk Conclusion</p> <p>Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the 'authorities and/or by the relevant entities ("Low risk" threshold (1) is met).</p>
1.17 Trade and transport	Not applicable. There are no legislation covering the removal and transport of timber	NA	N/A

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
1.18 Offshore trading and transfer pricing	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> • Tax Assessment Act (Ligningsloven), Article 2 - LBK nr 1081 af 07/09/2015 https://www.retsinformat ion.dk/forms/r0710.aspx?id=173414 • Tax Control Act (Skattekontrolloven), Article 3B. - LBK nr 1264 af 31/10/2013 https://www.retsinformat ion.dk/forms/r0710.aspx?id=152434 • Regulation no. 42 of January 24, 2006 on Transfer Pricing Documentation (Bekendtgørelse om dokumentation af prisfastsættelsen af kontrollerede 	<p>Non-Government sources</p> <p>Deloitte (2015): Global Transfer Pricing Country Guide. Available at: https://www2.deloitte.com/content/dam/Deloitte/global/Documents/Tax/dttl-tax-transfer-pricing-country-guide-2015.pdf. [Accessed 22 December 2016].</p> <p>PWC (2015): International Transfer Pricing 2015/16 p. 375-388. Available at: http://www.pwc.com/gx/en/international-transfer-pricing/assets/itp-2015-2016-final.pdf. [Accessed on 22 December 2016].</p> <p>Eoi-tax.org (N.Y): Denmark. Available at: http://www.eoi-tax.org/jurisdictions/DK#agreements. [Accessed 22 December 2016].</p>	<p>Overview of Legal Requirements</p> <p>Danish legislation builds on the 2010 OECD transfer pricing guidelines, applying the 'arm's length' principle for a given transaction. The legislation regulates both domestic and cross-border, inter-company transactions. Statutory financial results of Danish companies are publicly available in a Danish database (see www.Virk.dk). Each year, companies must disclose details of all transactions (no later than the income tax return filing date) or 60 days after being requested by the authorities. Documentation requirements are stipulated in Reg. No. 42. Penalties are in place. Following the failure to submit transfer pricing documentation, a 250,000 DKK fine can be issued (approx. EURO 35,000).</p> <p>Description of Risk</p> <p>Transfer pricing is a high priority for the Danish tax authorities, and an increasing number of transfer pricing issues have been detected over the past couple of years. In 2014, 76 transfer pricing adjustments were issued, nine more than in 2012 and 44 more than 2009. An amount of 40 billion DKK was issued as transfer pricing adjustments over the last two years (PWC 2015). Transfer pricing rarely ends up in litigation and only five significant legal cases have been brought to court since the 1980s, with none of these being in relation to Danish forestry. Where relevant, transfer pricing audits are conducted during regular tax audits. If a Danish company is part of a multinational group, the tax authorities generally issue a request for transfer pricing documentation. Denmark has entered into 53 Tax Information Exchange Agreements (TIEAs) with several of the known tax havens (eio-tax.org (N.Y)). No issues have been identified in relation to transfer pricing in Danish forestry.</p> <p>Risk Conclusion</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>transaktioner) - BEK nr 42 af 24/01/2006</p> <p>https://www.retsinformation.dk/Forms/R0710.aspx?id=17190</p> <ul style="list-style-type: none"> • Corporation Tax Act (Selskabsskatteloven), section 11. - LBK nr 680 af 20/05/2015 <p>https://www.retsinformation.dk/forms/r0710.aspx?id=169477</p> <p>Legal Authority</p> <ul style="list-style-type: none"> • Ministry of Taxation • Ministry of Business and Growth 		<p>Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the 'authorities and/or by the relevant entities ("Low risk" threshold (1) is met).</p> <p>.</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>Legally required documents or records</p> <p>Annual reporting on transfer pricing (not public)</p>		
1.19 Custom regulations	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> • Customs Act (Toldloven) - LBK nr 1223 af 20/09/2016 <p>https://www.retsinformat ion.dk/Forms/R0710.aspx?id=183644#id6cfae6b0-3ee5-4c9e-b9fc-8bdacfb00a4e</p> <p>Legal Authority</p> <ul style="list-style-type: none"> • <i>Ministry of Taxation</i> <p>Legally required documents or records</p>	<p>Government sources</p> <p>Non-Government sources</p> <p>Gregersen, R. (2013): Voldsom vækst i eksport af trævarer. Wood-supply.dk. Available at: http://www.wood-supply.dk/article/view/119588/voldsom_vaekst_i_eksport_af_traevarer#.Vh644vmggko. [Accessed 22 December 2016].</p>	<p>Overview of Legal Requirements</p> <p>Toldloven (Customs Act) sets general requirements for goods exported as well as imported. EU disclosure requirements are also included in this Act. According to the Customs Act, customs and tax authorities charge or refund the duties and taxes relating to goods exported from the Danish customs territory for export from the EU customs territory, as well as providing appropriate monitoring and controls. The Minister of Taxation can specify rules for implementing the tariff provisions of the intergovernmental agreements on international transport of goods and the rules on the transport and storage of unpaid goods. With regard to control, the Customs and Tax Administration can, in order to detect and control goods without a court order, move freely anywhere along the coasts, ports, airports, landing sites, in transport centers, in trains, on railway and on roads where there is public access. The authorities can inspect goods in postal items in warehouses, in containers, vehicles and other temporary or permanent sites, which can be used for storage of goods, etc. (Article 15). Drivers of vehicles shall, before departure from the Danish customs territory to a third country (Countries outside Denmark and the EU), report to the Customs and Tax Administration. Captains of ships arriving in a Danish port from elsewhere in the EU customs territory (or leaving the Danish customs territories for departure to somewhere else in the EU customs territory) must also – if the ship is carrying goods for which has not been paid duties or charges – report to customs and tax administration (Article 18). Customs and tax authorities may collect the relevant details of exporters, manufacturers, traders and other business organizations to meet EU reporting obligations. The reporting must contain information on currency, health, safety, veterinary, and plant pathological conditions (Article 27).</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	N/A		<p>Description of Risk</p> <p>Denmark mainly exports wood to countries ranking relatively high on the Corruption Perceptions Index (http://www.transparency.org/cpi2014/results): Germany (12), Sweden (4), Great Britain (14), Norway (5) and Belgium (15) (Gregersen 2013)). This indicates that risks associated with exports are limited. Furthermore, tax required through the Customs Act is applicable only to goods exported outside the EU, which is less relevant to the export of Danish wood.</p> <p>Risk Conclusion</p> <p>Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the 'authorities and/or by the relevant entities ("Low risk" threshold (1) is met).</p>
1.20 CITES	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> The Washington Convention/CITES (Washingtonkonventionen/CITES) - LBK nr 951 af 03/07/2013 <p>https://www.retsinformatio.n.dk/Forms/R0710.aspx?id=12548</p>	<p>Checklist.cites.org (N.Y) Checklist of CITES Species – Denmark. Available at: http://checklist.cites.org/#/en/search/country_ids%5B%5D=137&output_layout=alphabetical&level_of_listing=0&show_synonyms=1&show_author=1&show_english=1&show_spanish=1&show_french=1&scientific_name=Plantae&page=1&per_page=20 . [Accessed on 22 December 2016]</p>	<p>N/A</p> <p>There are no tree species classified as CITES species in Denmark</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>Legal Authority</p> <p>Ministry of Food and Environment</p> <p>Legally required documents or records</p> <p>CITES Permit</p>		
Diligence/due care procedures			
<p>1.21 Legislation requiring due diligence/due care procedures</p>	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> • EUTR Law (EUTR loven) - LOV nr 1225 af 18/12/2012 <p>https://www.retsinformation.dk/forms/r0710.aspx?id=144423</p> <p>Legal Authority</p> <ul style="list-style-type: none"> • Ministry of Food and Environment 	<p>Government sources</p> <p>EUTR.dk (N.Y): EUTR forbyder ulovligt fældet træ i EU. Available at: http://eutr.dk/. [Accessed on 22 december 2016].</p>	<p>Overview of Legal Requirements</p> <p>The Bekendtgørelse om handel med træ og træprodukter med henblik på bekæmpelse af handel med ulovligt fældet træ (Executive Order on Trade in Wood and Wood Products to Combat the Trade in Illegally Harvested Timber) establishes the regulation required to support the EUTR. The Danish Nature Agency is appointed to administer the enforcement. The regulation describes administrative decisions and penalty provisions. The legislation requires that all companies who are placing wood on the market: shall have a due diligence system in place; do not trade in illegally harvested wood: and shall be able to identify the companies' one step up and one step down the market chain.</p> <p>Description of Risk</p> <p>The Executive Order on Trade in Wood and Wood Products to Combat the Trade in Illegally Harvested Timber establishes the regulation required to support the EUTR. The Danish Nature Agency, which is appointed as the Competent Authority, has employed two staff to deliver the necessary control of Danish companies within the</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>Legally required documents or records</p> <p>N/A</p>		<p>forestry sector. This could potentially represent a risk as it might not be possible for the two staff to reach all companies within a given timeframe. There are still companies without a due diligence system in place in Denmark, but as the laws for forestry in Denmark are well-applied and enforced and the absence of a due diligence system does not represent a significant risk that laws are being violated.</p> <p>Risk Conclusion</p> <p>Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the 'authorities and/or by the relevant entities ("Low risk" threshold (1) is met).</p>

Recommended control measures

N/A

Controlled wood category 2: Wood harvested in violation of traditional and human rights

Risk assessment

Indicator	Sources of Information	Functional scale	Risk designation and determination
2.1. The forest sector is not associated with violent armed conflict, including that which threatens national or regional security and/or linked to military control.	See detailed analysis below.	Country, excluding Greenland and Faroe Islands	Low risk Justification: All 'low risk thresholds' (1, 2, 3, 4 and 5) are met. None of the 'specified risk thresholds' are met.
2.2. Labour rights are respected including rights as specified in ILO Fundamental Principles and Rights at work.	See detailed analysis below.	Country, excluding Greenland and Faroe Islands	Low risk Justification: Low risk thresholds 10 and 12 apply.
2.3. The rights of Indigenous and Traditional Peoples are upheld.	See detailed analysis below.	Country, excluding Greenland and Faroe Islands	Low risk Justification: The low risk thresholds 17, 19 and 21 apply.

Recommended control measures

Indicator	Recommended control measures
2.1	N/A
2.2	N/A
2.3	N/A

Detailed analysis

Sources of information	Evidence	Scale of risk assessment	Risk indication ¹
Context (the following are indicators that help to contextualize the information from other sources) <ul style="list-style-type: none"> Searching for data on: level of corruption, governance, lawlessness, fragility of the State, freedom of journalism, freedom of speech, peace, human rights, armed or violent conflicts by or in the country, etc. 			
World Bank: Worldwide Governance Indicators - the WGI report aggregate and individual governance indicators for 215 countries (most recently for 1996–2014), for six dimensions of governance: Voice and Accountability; Political Stability and Absence of Violence; Government Effectiveness; Regulatory Quality; Rule of Law; Control of Corruption http://info.worldbank.org/governance/wgi/index.aspx#home	http://info.worldbank.org/governance/wgi/index.aspx#reports (click on table view tab and select Country) In 2014 (latest available year) Denmark scores between 80 (for Political Stability and Absence of Violence/Terrorism and 100 (for Control of Corruptions) on the percentile rank among all countries for all six dimensions (the scores range from 0 (lowest rank) to 100 (highest rank) with higher values corresponding to better outcomes).	Country	
World Bank Harmonized List of Fragile Situations	http://siteresources.worldbank.org/EXTLICUS/Resources/511777-1269623894864/FY15FragileSituationList.pdf Denmark does not feature in this list.	Country	
Committee to Protect Journalists: Impunity Index CPJ's Impunity Index calculates the number of unsolved journalist murders as a percentage of each country's population. For this index, CPJ examined journalist murders that occurred between January 1, 2004, and December 31, 2013, and that remain unsolved. Only those nations with five or more unsolved cases are included on this index.	http://cpi.org/reports/2014/04/impunity-index-getting-away-with-murder.php Denmark does not feature in this list.	Country	
Carleton University: Country Indicators for Foreign Policy: the Failed and Fragile States project of Carleton University examines state fragility using a combination of structural data and current event monitoring http://www4.carleton.ca/cifp/ffs.htm (Select Country Ranking Table)	http://www4.carleton.ca/cifp/app/serve.php/1419.pdf Denmark scores 'low' on State fragility map 2011.	Country	
Human Rights Watch: http://www.hrw.org	https://www.hrw.org/news/2013/02/14/divided-we-fall-intolerance-europe-puts-rights-risk <i>Divided We Fall: Intolerance in Europe Puts Rights at Risk</i> "In Greece, Human Rights Watch research found that the failure of the authorities to respond adequately to vigilante attacks on migrants is fraying the fabric of society. Human Rights Watch documented more than 50 serious attacks, including two on pregnant women. A Somali asylum-seeker who acted	Country	

¹ A risk indication is provided for each source analyzed, except in the first part that addresses the general country context as that is not a risk indicator. A cumulative risk assessment for each risk indicator is provided in the row with the conclusion on each risk indicator, based on all the sources analyzed and evidence found.

	<p>as a translator for Human Rights Watch was beaten by five men in Athens in June, breaking his hand. He was attacked again in January, by six people who beat and kicked him, injuring his nose and back.</p> <p>According to a recent EU Fundamental Rights Agency study, as many as one in four Roma (in the Czech Republic, Greece and Poland), Somalis (in Finland and Denmark), and Africans (in Malta and Ireland), said they had experienced hate-motivated violence or serious harassment in the previous 12 months.”</p>		
US AID: www.usaid.gov Search on website for [country] + ‘human rights’	No information found on specified risks after searching Denmark + ‘human rights’	Country	
Global Witness: www.globalwitness.org Search on website for [country] + ‘human rights’	No information found on Denmark on illegal logging.	Country	
http://wwf.panda.org/about_our_earth/about_forests/deforestation/forest_illegal_logging/	<p>http://wwf.panda.org/about_our_earth/deforestation/deforestation_causes/illegal_logging/</p> <p>No information found on Denmark on illegal logging.</p> <p>http://indicators.chathamhouse.org/sites/files/reports/Tackling%20Illegal%20Logging%20and%20Related%20Trade_0.pdf</p> <p>No information found on Denmark on illegal logging.</p>	Country	
Chatham House Illegal Logging Indicators Country Report Card http://www.illegal-logging.info	<p>http://www.illegal-logging.info/sites/files/chlogging/uploads/ETTF2011Denmarkstatistics.pdf</p> <p><i>Exposure of imports to legality verification</i></p> <p>“The “level of exposure to verified negligible risk” for Danish timber imports from outside the EU increased from 21% to 32% between 2007 and 2011. This was mainly due to the rising share in Danish imports of Norway, and to a lesser extent Chile and Uruguay, all countries where forest certification is well established. The level of exposure for Danish imports from within the EU also increased between 2007 and 2011 from 63% to 70%. Again this was primarily due to the rising share of Danish imports from EU countries where certification is already well established, notably Sweden, Finland and Germany. The level of exposure for Danish domestic wood increased slightly from 44% in 2007 to 50% in 2011, due primarily to an increase in PEFC certification in Denmark. A large proportion of Denmark’s domestic forests, and a rising proportion of EU forests, are dual FSC/ PEFC certified. Danish wood imports are relatively more exposed to PEFC certified forests than to FSC certified forests. Denmark’s exposure to other forms of legality verification is negligible”</p> <p><i>Imports & FLEGT VPAs</i></p>	Country	

	<p>“Countries having signed or now negotiating VPAs supplied Denmark with 68,000 m3 (RWE) of wood products in 2011, 7% of imports from outside the EU. Existing VPAs are significant only in relation to Danish imports from South East Asia. 83% of Danish imports from this region come from countries having agreed or currently negotiating VPAs. Most imports from Africa also derive from VPA countries, but volumes are very small.”</p> <p><i>Imports and corruption</i></p> <p>“Compared to other EU Member States, quite a high proportion of Danish extra-EU imports are from countries with low corruption. Much comes from non-EU European countries, notably Norway which will also implement EUTR in 2013. Much Danish import from Latin America comes from Chile, characterised by low corruption. Nevertheless, significant imports also come from regions with high corruption, notably China and Russia/CIS.”</p> <p>http://www.illegal-logging.info/sites/files/chlogging/uploads/ETTF2011Denmarkstatistics.pdf</p> <p><i>Imports and corruption</i></p> <p>“Compared to other EU Member States, quite a high proportion of Danish extra EU imports are from countries with low corruption. Much comes from non-EU European countries, notably Norway which will also implement EUTR in 2013. Much Danish import from Latin America comes from Chile, characterised by low corruption. Nevertheless, significant imports also come from regions with high corruption, notably China and Russia/CIS.”</p>	Country	
Transparency International Corruption Perceptions Index	<p>https://www.transparency.org/cpi2015/results</p> <p>Denmark scores 91 points on the Corruption Perceptions Index 2014 on a scale from 0 (highly corrupt) to 100 (very clean). Denmark ranks 1 out of 168 with rank no. 1 being the most clean country.</p>	Country	
Amnesty International Annual Report: The state of the world's human rights -information on key human rights issues, including: freedom of expression; international justice; corporate accountability; the death penalty; and reproductive rights	<p>https://www.amnesty.org/en/documents/pol10/0001/2015/en/</p> <p><i>State of the Human Rights Report 2014/15</i></p> <p>A few minor negative issues are reported on Denmark in the country chapter of the <i>State of the Human Rights Report 2014/15</i> (pages 131, 132). Most are related to refugees and asylum-seekers, LGBT rights and violence against woman and girls.</p>	Country	
Freedom House http://www.freedomhouse.org/	<p>http://www.freedomhouse.org/report-types/freedom-world#U-3g5fl_sVc</p> <p>The status of Denmark on the Freedom in the World index 2015 is 'free'.</p> <p>https://freedomhouse.org/report/freedom-net/freedom-net-2015</p> <p>Denmark does not feature on this map.</p>	Country	

	https://freedomhouse.org/report/freedom-press/freedom-press-2015#.VoJLcVmkaf4 The status of Denmark on the Freedom of the Press is 'free'.		
Reporters without Borders: Press Freedom Index https://rsf.org/en/ranking	https://rsf.org/en/ranking 2015 World Press Freedom Index In 2015, Denmark ranked 3 out of 180 countries on World Press Freedom Index.	Country	
Fund for Peace - Fragile States Index - the Fund for Peace is a US-based non-profit research and educational organization that works to prevent violent conflict and promote security. The Fragile States Index is an annual ranking, first published in 2005 with the name Failed States Index, of 177 nations based on their levels of stability and capacity http://fsi.fundforpeace.org/	<i>Fragile States Index 2015</i> http://fsi.fundforpeace.org/ <i>Fragile States Index 2015</i> Denmark is ranked 175 out of 178 countries on the Fragile States Index 2015. (No. 1 being the most failed state). This ranks Denmark in the category 'sustainable'.	Country	
The Global Peace Index. Published by the Institute for Economics & Peace, This index is the world's leading measure of national peacefulness. It ranks 162 nations according to their absence of violence. It's made up of 23 indicators, ranging from a nation's level of military expenditure to its relations with neighbouring countries and the level of respect for human rights. Source: The Guardian: http://economicsandpeace.org/research/iep-indices-data/global-peace-index	http://economicsandpeace.org/wp-content/uploads/2015/06/Global-Peace-Index-Report-2015_0.pdf 2015 Global Peace Index The state of Peace in Denmark is labeled 'High' with Denmark ranking number 2 out of 162 countries (no. 1 being the most peaceful country) with a score of 1.438.	Country	
Additional sources of information (These sources were partly found by Googling the terms '[country]', 'timber', 'conflict', 'illegal logging')	Evidence	Scale of risk assessment	Risk indication
From national CW RA: FSC Controlled Wood risk assessment FSC-CW-RA-019-DK V1-0 SPECIFIC REQUIREMENTS INTERPRETATION OF ANNEX 2B OF THE STANDARD FOR COMPANY EVALUATION OF FSC CONTROLLED WOOD FOR DENMARK (FSC-STD-40-005-V-2.1) Approval date: 20 October 2014 Effective date: 20 October 2014 Info on illegal logging	"1.1 Evidence of enforcement of logging related laws in the district: Low risk Evidence: The Act of Forests with appurtenant consolidating acts, guidelines, etc. regulates all commercial logging of forests in Denmark. Enforcement of other logging related laws (related to for example nature protection, tax, workers' rights, cultural values etc.) is ensured by controls undertaken by relevant authorities. After the implementation of the EU Timber Regulation, the enforcement is further strengthened as the Danish Competent Authority follows up noncompliance reported by the other authorities. The Danish Forest Law and other logging related legislation is well known among the Danish forest owners and breaches are rare. There is no evidence that illegal logging is a wide scale problem in Denmark.	Country	

	<p>Sources of information: A list of logging related legislation in Denmark, compiled by NEPCon for the FSC Global forest registry is available here: http://www.globalforestregistry.org/related_files/download_related_file/178 A more complete list of applicable legislation is, in cooperation with FSC Denmark, currently compiled by the Danish Competent Authority to support the enforcement of the EU Timber Regulation and the revised Danish FSC forest standard. The Danish Competent Authority confirms that there is evidence of enforcement of logging related laws in Denmark.</p> <p>“1.2 There is evidence in the district demonstrating the legality of harvests and wood purchases that includes robust and effective system for granting licenses and harvest permits: Low risk Evidence: The Danish Forest Law regulates harvest limits and where harvest can be undertaken, but harvesting permits are not required in Denmark. Where state subsidies are received, for example in relation replanting after storm fall, some requirements related to number of plants, species etc. apply. The Danish forest law authorities apply checks of compliance in the field and via maps. No reports are publicly available, but the Danish Competent Authority confirms that there is evidence demonstrating the legality of harvests and wood purchases in Denmark. Sources of information: Danish Forest Law Act of Forests (consolidating act No. 945 of 24/09/2009) Tax legislation The Danish Competent Authority confirms that there is evidence demonstrating the legality of harvests and wood purchases in Denmark.</p> <p>“1.3 There is little or no evidence or reporting of illegal harvesting in the district of origin: Low risk Evidence: Illegal harvesting in Denmark has also not been reported in any international or national reports. Sources of information: The Danish Competent Authority confirm that there is very little or no evidence of illegal harvesting in Denmark. Transparency International www.transparency.org www.illegal-logging.info www.eia-international.org”</p> <p>“1.4 There is a low perception of corruption related to the granting or issuing of harvesting permits and other areas of law enforcement related to harvesting and wood trade: Low risk Evidence: According to Transparency International's corruption perception index, Denmark in 2013 scored 91, which together with New Zealand, rank it the least corrupt country in the world.</p>		
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	<p>According to the World Bank, Denmark is within the 90th-100th Percentile concerning the parameters Government Effectiveness, Regulatory Quality, Rule of Law and Control of Corruption.</p> <p>Sources of information: The Danish Competent Authority confirm that there is a low perception of corruption related to the granting or issuing of harvesting permits and other areas of law enforcement related to harvesting and wood trade.</p> <p>Transparency International: www.transparency.org www.illegal-logging.info www.eia-international.org World Bank Governance and Anti-Corruption Data”</p>		
<p>Conclusion on country context: Denmark scores very positive on all indicators reviewed in this context section. It is a stable country, with a strong democratic system and good governance, and it is a free country for all its citizens with a good justice system.</p>		Country, excluding Greenland and Faroe Islands	
<p>Indicator 2.1. The forest sector is not associated with violent armed conflict, including that which threatens national or regional security and/or linked to military control.</p>			
<p>Guidance</p> <ul style="list-style-type: none"> • Is the country covered by a UN security ban on exporting timber? • Is the country covered by any other international ban on timber export? • Are there individuals or entities involved in the forest sector that are facing UN sanctions? 			
<p>Compendium of United Nations Security Council Sanctions Lists: www.un.org</p>	<p>https://www.un.org/sc/suborg/sites/www.un.org.sc.suborg/files/consolidated.pdf There is no UN Security Council ban on timber exports from Denmark.</p>	Country	Low risk
<p>US AID: www.usaid.gov</p>	<p>Denmark is not covered by any other international ban on timber export.</p>		
<p>Global Witness: www.globalwitness.org</p>	<p>There are no individuals or entities involved in the forest sector in Denmark that are facing UN sanctions.</p>		
<p>From national CW RA: FSC Controlled Wood risk assessment FSC-CW-RA-019-DK V1-0 SPECIFIC REQUIREMENTS INTERPRETATION OF ANNEX 2B OF THE STANDARD FOR COMPANY EVALUATION OF FSC CONTROLLED WOOD FOR DENMARK (FSC-STD-40-005-V-2.1) Approval date: 20 October 2014 Effective date: 20 October 2014</p>	<p>2.1 There is no UN Security Council ban on timber exports from the country concerned: Low risk Evidence: There is no UN Security Council export ban in the country.</p> <p>Sources of information: Global Witness http://www.globalwitness.org www.un.org Latest report from the UN Security Council www.usaid.gov</p>	Country	Low risk
<p>Guidance</p> <ul style="list-style-type: none"> • Is the country a source of conflict timber? If so, is it at the country level or only an issue in specific regions? If so – which regions? • Is the conflict timber related to specific entities? If so, which entities or types of entities? 			

<p>www.usaid.gov</p> <p>Conflict Timber is defined by US AID as: - conflict financed or sustained through the harvest and sale of timber (Type 1), - conflict emerging as a result of competition over timber or other forest resources (Type 2) Also check overlap with indicator 2.3</p>	<p>No information on conflict timber in Denmark found.</p>	<p>Country</p>	<p>Low risk</p>
<p>www.globalwitness.org/campaigns/environment/forests</p>	<p>https://www.globalwitness.org/en/archive/danish-timber-giant-kicked-out-forest-stewardship-council-certification-scheme-trading <i>DANISH TIMBER GIANT KICKED OUT OF FOREST STEWARDSHIP COUNCIL CERTIFICATION SCHEME FOR TRADING ILLEGAL TIMBER</i> <i>Press Release / Feb. 12, 2015</i> “Danish timber giant Dalhoff Larsen and Horneman (DLH) has been expelled from the world’s leading timber certifier, the Forest Stewardship Council, following evidence presented by Global Witness that the company traded illegal timber linked to land grabbing in Liberia. FSC’s finding that DLH followed none of its own due diligence procedures casts serious doubt over law enforcement efforts by Danish authorities responsible for policing the import of illegal timber into Europe.” “Right now, consumers can’t be sure the wood they buy is legal and sustainable. FSC has done the right thing by expelling DLH, but it shows that you can’t even be sure that certified companies are trading legally”, said Patrick Alley, co-Director of Global Witness. “Danish authorities now need to explain why they found DLH legally compliant just months after Global Witness found illegal timber in front of its warehouse in France.”</p>	<p>Country</p>	<p>Low risk</p>
<p>Human Rights Watch: http://www.hrw.org/</p>	<p>No information on conflict timber in Denmark found on this website.</p> <p>http://www.hrw.org/world-report/2015 No information found on conflict timber in Denmark in the World Report 2015.</p>	<p>Country</p>	<p>Low risk</p>
<p>World Resources Institute: Governance of Forests Initiative Indicator Framework (Version 1) http://pdf.wri.org/working_papers/gfi_tenure_indicators_sep09.pdf Now: PROFOR http://www.profor.info/node/1998</p>	<p>No information found on conflict timber in Denmark.</p>	<p>Country</p>	<p>Low risk</p>
<p>Amnesty International Annual Report: The state of the world’s human rights -information on key human rights issues, including: freedom of expression; international justice; corporate accountability; the death penalty; and reproductive rights</p>	<p>No information in the Amnesty International Report 2014/2015 on conflict timber in Denmark found.</p>	<p>Country</p>	<p>Low risk</p>

http://www.amnesty.org			
World Bank: Worldwide Governance Indicators - the WGI report aggregate and individual governance indicators for 213 economies (most recently for 1996–2014), for six dimensions of governance: Voice and Accountability; Political Stability and Absence of Violence; Government Effectiveness; Regulatory Quality; Rule of Law; Control of Corruption http://info.worldbank.org/governance/wgi/index.aspx#home Use indicator 'Political stability and Absence of violence' specific for indicator 2.1	http://info.worldbank.org/governance/wgi/index.aspx#reports In 2014 (latest available year) Denmark scores on the indicator <i>Political Stability and Absence of Violence/Terrorism</i> 79.61 on the percentile rank among all countries (ranges from 0 (lowest) to 100 (highest rank) with higher values corresponding to better outcomes. No evidence found that this rank has a relationship with conflict timber.	Country	Low risk
Greenpeace: www.greenpeace.org Search for 'conflict timber [country]'	No information on conflict timber or illegal logging in Denmark found on this website.	Country	Low risk
CIFOR: http://www.cifor.org/ http://www.cifor.org/publications/Corporate/FactSheet/forests_conflict.htm	No information on conflict timber or illegal logging in Denmark found.	Country	Low risk
Google the terms '[country]' and one of following terms or in combination 'conflict timber', 'illegal logging'	No additional information on conflict timber or illegal logging in Denmark found.	Country	Low risk
From national CW RA: FSC Controlled Wood risk assessment FSC-CW-RA-019-DK V1-0 SPECIFIC REQUIREMENTS INTERPRETATION OF ANNEX 2B OF THE STANDARD FOR COMPANY EVALUATION OF FSC CONTROLLED WOOD FOR DENMARK (FSC-STD-40-005-V-2.1) Approval date: 20 October 2014 Effective date: 20 October 2014	2.2 The country or district is not designated a source of conflict timber (e.g. USAID Type 1 conflict timber): Low risk Evidence: Denmark is not associated with or designated as source of conflict timber according to available research. The USAID does not mention anything about Denmark being an area for "conflict timber" analogous with USAID Type 1 conflict timber. Sources of information: www.usaid.gov Danish forest legislation and the legal system in general	Country	Low risk
Conclusion on indicator 2.1: No information was found on Denmark as a source of conflict timber and the forest sector is not associated with any violent armed conflict. The following low risk thresholds apply: (1) The area under assessment is not a source of conflict timber ² ; AND (2) The country is not covered by a UN security ban on exporting timber; AND (3) The country is not covered by any other international ban on timber export; AND (4) Operators in the area under assessment are not involved in conflict timber supply/trade; AND (5) Other available evidence does not challenge 'low risk' designation.		Country, excluding Greenland and Faroe Islands	Low risk
Indicator 2.2. Labour rights are respected including rights as specified in ILO Fundamental Principles and Rights at work.			

² “Conflict timber” limited to include “timber that has been traded at some point in the chain of custody by armed groups, be they rebel factions or regular soldiers, or by a civilian administration involved in armed conflict or its representatives, either to perpetuate conflict or take advantage of conflict situations for personal gain - conflict timber is not necessarily illegal. Please refer to FSC-PRO-60-002a V1-0.

Guidance

- Are the social rights covered by the relevant legislation and enforced in the country or area concerned? (refer to category 1)
- Are rights like freedom of association and collective bargaining upheld?
- Is there evidence confirming absence of compulsory and/or forced labour?
- Is there evidence confirming absence of discrimination in respect of employment and/or occupation, and/or gender?
- Is there evidence confirming absence of child labour?
- Is the country signatory to the relevant ILO Conventions?
- Is there evidence that any groups (including women) feel adequately protected related to the rights mentioned above?
- Are any violations of labour rights limited to specific sectors?

general sources from FSC-PRO-60-002a V1-0 EN	information found and specific sources	scale of risk assessment	risk indication
<p>Status of ratification of fundamental ILO conventions: http://www.ilo.org/dyn/normlex/en/f?p=1000:11001:0::NO:: or use: ILO Core Conventions Database: http://www.ilo.org/ilolex/english/docs/declworld.htm C29 Forced Labour Convention, 1930 C87 Freedom of Association and Protection of the Right to Organise Convention, 1948 C98 Right to Organise and Collective Bargaining Convention, 1949 C100 Equal Remuneration Convention, 1951 C105 Abolition of Forced Labour Convention, 1957 C111 Discrimination (Employment and Occupation) Convention, 1958 C138 Minimum Age Convention, 1973 C182 Worst Forms of Child Labour Convention, 1999</p> <p>Ratification as such should be checked under Category 1. In Cat. 2 we take that outcome into consideration. Refer to it.</p>	<p>http://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102609 Denmark has ratified all 8 fundamental ILO Convention. The status of all 8 conventions is 'in force'.</p> <p>http://www.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID:3148996:NO <i>Direct Request (CEACR) - adopted 2013, published 103rd ILC session (2014) Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87) - Denmark</i> This document contains no information that leads to a 'specified risk' indication.</p> <p>http://www.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID:3148999:NO <i>Observation (CEACR) - adopted 2013, published 103rd ILC session (2014) Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87) - Denmark</i> This document contains no information that leads to a 'specified risk' indication.</p> <p>http://www.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID:3149013:NO <i>Direct Request (CEACR) - adopted 2013, published 103rd ILC session (2014) Right to Organise and Collective Bargaining Convention, 1949 (No. 98) - Denmark</i> "Article 4 of the Convention. Collective bargaining rights of majority organizations. Following the recommendation made by the Committee on Freedom of Association in Case No. 1971, the Committee had previously requested the Government to review section 12 of the Conciliation Act, which makes it possible for an overall draft settlement, made by the public conciliator and sent out for ballot, to cover collective agreements involving an entire sector of activity, even if the organization representing most of the workers in that</p>	<p>Country</p> <p>Country</p> <p>Country</p> <p>Country</p>	<p>Low risk</p> <p>Low risk</p> <p>Low risk</p> <p>Low risk</p>

	<p>men, that more women worked part time in the public sector (35 per cent compared to 15 per cent of men) and that women retired earlier than men. The Committee also notes that the labour market continues to be segregated by gender and that, at the regional level, more than 80 per cent of the employees are women. <i>The Committee requests the Government to continue to provide up-to-date information on the evolution of the gender pay gap and its causes and on the measures taken or envisaged to improve the access of women to a wider range of job opportunities at all levels, including sectors in which they are currently absent or under-represented, with a view to reducing inequalities in remuneration that exist between men and women in the labour market.</i></p> <p>Article 2(2). Implementation of legislation. <i>The Committee notes with interest that Act No. 513 of 25 May 2014 amending section 5a of Act No. 899 on equal pay to men and women extends the obligation to prepare annually sex disaggregated statistics from employers employing 35 workers or more to employers employing ten workers or more, of which at least three are men and three are women. The amendment aims to increase awareness of gender-segregated wage statistics, to provide a tool to employers and employees to cooperate towards the eradication of gender-specific wage differences and to provide a legal basis for alleged cases of wage discrimination. The Government indicates that according to Statistics Denmark, the number of employees covered by the new legislation increased from 2.24 million in 536 public and 2,925 private enterprises to 2.7 million in 800 public and 12,500 private enterprises. The Committee further notes that the Government will be providing enterprises with gender-segregated pay statistics free of charge, and will develop a guide on how to use these statistics. At the same time, the Committee notes that according to the LO and FTF, wage differences will be shown as index numbers, which makes it impossible to compare different jobs of equal value.” (..)</i></p> <p>“Article 4. Cooperation with workers’ and employers’ organizations. The Committee notes from the information provided by the LO and FTF, Danish Regions and the KL that no further equal pay tribunals have been established by the social partners, nor have the existing tribunals settled any cases. However, the LO and FTF indicate that settling cases with the employers before they reach the tribunals had a preventive effect. The DA states that, between 2011 and 2015, there were no cases in the courts concerning equal pay. The Committee welcomes the information that, according to the LO and FTF, the Danish Association of Local Government Employees’ Organization (KTO) concluded four different agreements with the KL and Danish Regions on wage differences, gender mainstreaming and on gender-divided wage statistics. Furthermore, the Committee welcomes the information provided by the KL that, in the municipal sector, social partners carried out projects on payment structures with a focus on gender, and that within the LO a network of unions undertakes training programmes on equal pay legislation for shop stewards and union representatives.” (..)</p>	Country	Low risk on gender wage discrimination
		Country	Low risk on gender wage discrimination

	<p>“Other measures to address the gender pay gap. The Committee recalls that the Wage Commission’s report on “wages, gender, education and flexibility” of 2010 highlighted the persistence of horizontal and vertical gender segregation in the labour market, and notes that the Government has commissioned a new study on the gender-segregated labour market to the Danish National Centre for Social Research (SFI), which is due at the end of 2015. The Committee further notes with <i>interest</i> that the Act on Gender Equality was further amended by Act No. 1288 of 19 December 2012, and consolidated by Act No. 1678 of 19 December 2013. Section 8 of Chapter 4 of the Equality Act contains obligations to attain a balanced gender composition of certain public committees and boards. The Government indicates that public institutions, listed companies, state-owned companies, commercial foundations and financial companies are covered by this “Danish Model” amounting to approximately 1,200 entities. The Government indicates that according to a study carried out in 2014, 73 per cent of the institutions and companies have set target figures, which, on average, set targets of increasing the proportion of the under-represented gender by 25 per cent in an average time frame of four years. In January 2015, 15 per cent of the board members were women, compared to 29 per cent in state-owned companies.” (..)</p> <p>http://www.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID:3254433:NO</p> <p><i>Direct Request (CEACR) - adopted 2015, published 105th ILC session (2016) Discrimination (Employment and Occupation) Convention, 1958 (No. 111) - Denmark</i></p> <p>“Article 1(a) of the Convention. Discrimination based on sex. Further to its previous comments in which it noted the high number of cases relating to dismissal on the ground of pregnancy or maternity leave, the Committee notes from the statistics provided by the Government that, between 2011 and 2014, the number of cases did not decrease. In 2014, a total of 47 alleged cases of discrimination based on pregnancy and childbirth were referred to either the courts or the Board of Equal Treatment, of which 23 were considered well founded. In 2012, the same courts and the Board found a breach of the equal treatment legislation on the same grounds in 27 out of 66 cases; in 2013, in 26 out of 72 cases; in 2014, in 27 out of 43 cases; and in 2015 (until 31 May), in four out of six cases. <i>The Committee requests the Government to continue providing information on the case law developed by the courts and the Board of Equal Treatment regarding discrimination on the basis of sex, including pregnancy and maternity leave. The Committee also once again requests the Government to examine, in cooperation with the social partners, the need for further action to prevent and eliminate discrimination on grounds of pregnancy and maternity leave, and to provide information on any steps taken in this regard.</i></p>	Country	Specified risk on discrimination of women
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	<p>Articles 2 and 3. Equality of opportunity and treatment between men and women. Legislative developments. The Committee notes with <i>interest</i> the adoption of Act No. 217 of 5 March 2013 amending Consolidation Act No. 645 of 2011 on equal treatment between men and women in employment, which introduces provisions on the right to request flexible working hours during parental leave (section 8) and protection measures against dismissal because of absence due to pregnancy, birth, adoption and maternity (sections 9 and 16). The Committee also notes that the Act on gender equality was further amended by Act No. 1288 of 19 December 2012, and consolidated by Act No. 1678 of 19 December 2013, and refers to its comments under the Equal Remuneration Convention, 1951 (No. 100). <i>The Committee requests the Government to provide information on the application in practice of the equality legislation, including relevant judicial or administrative decisions, sanctions imposed and remedies provided.</i></p> <p>http://www.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID:3258599:NO</p> <p><i>Observation (CEACR) - adopted 2015, published 105th ILC session (2016) Discrimination (Employment and Occupation) Convention, 1958 (No. 111) - Denmark</i></p> <p>“Statistics on equality of opportunity and treatment. The Committee welcomes the detailed disaggregated statistics provided by the Government which show that in 2013 the employment rate of persons of Danish origin was 73.8 per cent (75.2 per cent for men and 72.4 per cent for women), compared to an employment rate of 47.7 per cent for immigrants from non-Western countries (52.9 per cent for men and 42.9 per cent for women) and an employment rate of 52.2 per cent for the descendants of immigrants from non-Western countries (52.3 per cent for men and 52.1 per cent for women). The statistics also show a much higher unemployment rate for immigrants from non-Western countries (13.2 per cent for men and 14 per cent for women), compared to Danish nationals (5.6 per cent for men and 5.5 per cent for women). The Committee notes that the Government adopted various measures aimed at increasing the labour force participation of immigrants and at combating discrimination and promoting diversity. In particular, the Committee notes the adoption in November 2012 of “a strengthened integration policy”, including initiatives to improve employment among immigrants, and the adoption of Act No. 1115 of 23 September 2013 consolidating Act No. 1035 on integration, which provides for a three-year introduction programme for immigrants, including career guidance and qualification, a trainee programme and wage subsidies. The Committee also notes that the Government’s National Reform Programme 2015 and the Government Plan of 2015 include new integration initiatives aiming to ensure that refugees and immigrants obtain employment as soon as possible. The Committee further notes that a four-party agreement on integration focusing on</p>	Country	Low risk on discrimination of women
		Country	Low risk on discrimination of immigrants from non-Western countries

	<p>strengthening immigrants' language skills and knowledge about vocational education was signed in June 2014 between the Government (Ministries of Employment and Education), Local Government Denmark, the Confederation of Danish Employers (DA) and the Danish Confederation of Trade Unions (LO)." (..)</p> <p>http://www.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID:2699914 <i>Direct Request (CEACR) - adopted 2011, published 101st ILC session (2012)</i> <i>Minimum Age Convention, 1973 (No. 138) - Denmark</i> "Article 3(3) of the Convention. Admission of young persons to types of hazardous work from the age of 16 years. (..) The Committee also notes the Government's indication that, as a rule, it is not permitted for young persons under 18 years to carry out dangerous work. The protection of young persons against dangerous work is partly secured by the introduction of the ban of this work and partly by the high safety requirements which have to be met by any type of work involving persons under 18 years. The Government also states that instruction E.0.2 stipulates that if young persons under the age of 18 are employed in an enterprise, the risks that young persons may face must be described separately in the risk assessment of the enterprise. Employers must make sure that the correct measures are taken to avoid these risks at work, particularly in light of a young person's lack of experience and risk-awareness. Finally, the Committee notes the Government's indication that employers must also make sure that young persons are given thorough training and instruction so that they can work securely, paying special attention to ensure that a young person understands how the relevant work should be performed in a safe and healthy manner." "Part V of the report form. Application of the Convention in practice. Following its previous comments, the Committee once again notes the detailed statistics from the DWEA. The Committee notes that in 2008 and 2009, the DWEA responded to 318 incidents related to violations of the rules on the work of young persons. In 2008, this included two prohibitions, 42 improvement notices and 81 instructions. In 2009, this included one prohibition, 151 improvement notices and 140 instructions. The Government indicates that the increase in improvement notices in 2009 was the result of the focus by inspection centres on the working conditions of young persons during the summer of 2009. The Government also indicates that the majority of these improvement notices were related to health and safety problems concerning working alone, working hours and rest periods, ergonomic problems, contact with substances and materials and lack of technical tools and aids."</p> <p>http://www.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID:2700551 <i>Direct Request (CEACR) - adopted 2011, published 101st ILC session (2012)</i></p>	<p>Country</p> <p>Country</p>	<p>Low risk on child labour</p> <p>Low risk on child labour</p>
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	<p>and destination country for child victims of trafficking-related crimes, including forced child prostitution and labour. The Committee also notes the CRC's statement that efforts to prosecute traffickers and persons subjecting children to forced labour and prostitution continue to require strengthening (CRC/C/DNK/CO/4 paragraph 61). <i>In this regard, the Committee urges the Government to intensify its efforts to combat the worst forms of child labour in the country, including trafficking for the purposes of forced labour and prostitution. The Committee also requests the Government to take the necessary measures to ensure that sufficient up-to-date data on the worst forms of child labour is made available. In this respect, the Committee requests the Government to provide information on the number of infringements reported, investigations, prosecutions, convictions and penal sanctions applied related to the worst forms of child labour, along with its next report. To the extent possible, all information provided should be disaggregated by sex and age.</i>"</p>		
<p>ILO Declaration on Fundamental Principles and Rights at Work. Country reports. http://www.ilo.org/declaration/lang--en/index.htm Source of several reports. Search for 'racial discrimination', 'child labour', 'forced labour', 'gender equality', 'freedom of association'</p>	<p>No information on specified risks in Denmark found.</p>	Country	Low risk
<p>ILO Child Labour Country Dashboard: http://www.ilo.org/pec/Regionsandcountries/lang--en/index.htm</p>	<p>No information on specified risks in Denmark found.</p>	Country	Low risk
<p>Global March Against Child Labour: http://www.globalmarch.org/</p>	<p>No information on specified risks in Denmark found.</p>	Country	Low risk
<p>Office of the United Nations High Commissioner for Human Rights (OHCHR), Committee on Rights of the Child: http://www.ohchr.org/EN/HRBodies/CRC/Pages/CRCIndex.aspx</p>	<p>http://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolno=CRC%2fC%2fDNK%2fCO%2f4&Lang=en Committee on the Rights of the Child Consideration of reports submitted by States parties under article 44 of the Convention Concluding observations: Denmark 7 April 2011 "III. Main areas of concern and recommendations (..) Asylum-seeking and refugee children 57. The Committee welcomes the high standards of the reception centres for unaccompanied children seeking asylum and that these children will continue to have access to a legal representative following a negative decision on their asylum case as per amendments to the Danish Aliens Act. However, the Committee is concerned that: (a) There are unaccompanied asylum-seeking children disappearing prior to the final processing of their asylum case;" (..) "Trafficking</p>		

	<p>61. The Committee, while welcoming the State party's efforts to combat trafficking in children, is concerned that Denmark continues to be a significant transit and destination country for child victims of trafficking-related crimes, including forced child prostitution and labour. The Committee is also deeply concerned that the efforts taken to prosecute traffickers and persons subjecting children to forced labor and prostitution continue to require strengthening. The Committee further notes with concern the absence of a legal framework to facilitate the granting of residence permits to child victims of trafficking.</p> <p>62. The Committee urges the State party to take effective measures to safeguard the rights of children in their territory, especially those of unaccompanied children, to ensure that they do not fall prey to trafficking. In so doing, the Committee urges the State party:</p> <p>(a) To ensure that children who are suspected victims of trafficking will not be imprisoned as a result of conditions which are the consequence of them being trafficked, and that they are provided with specialized assistance services;</p> <p>(b) To vigorously prosecute, convict, and sentence sex and labour trafficking offenders;</p> <p>(c) To ensure that the sanctions for such offences are commensurate with the gravity of this serious human rights and child rights abuse;</p> <p>(d) To ensure that law enforcement officials and other social officials who are working with and for the children are effectively trained in methods of victim identification and treatment;</p> <p>(e) To encourage and support a broad, nationwide public awareness programme;</p> <p>(f) To enhance the monitoring of anti-trafficking efforts to improve the Government's response to child trafficking;</p> <p>(g) To ensure, through appropriate legislative measures, that child victims of trafficking are not repatriated except where such repatriation is in their best interests."</p>	Country	Specified risk on child labour
<p>Committee on the Elimination of Discrimination against Women http://www.ohchr.org/en/hrbodies/cedaw/pages/cedawindex.aspx (Use the link to 'Key documents' on the left hand side. Go to 'observations' and search for country.) (Refer to CW Cat. 1) Or: Right top select country click on CEDAW treaty, click on latest reporting period and select concluding observations</p>	<p>http://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolno=CEDAW%2fC%2fDNK%2fCO%2f8&Lang=en Committee on the Elimination of Discrimination against Women Concluding observations on the eighth periodic report of Denmark 11 March 2015 "C. Principal areas of concern and recommendations (..) Legislative framework</p> <p>11. The Committee regrets that, notwithstanding its previous recommendation (CEDAW/C/DEN/CO/7, para. 15), the State party decided in October 2014 not to incorporate the Convention into its national legal order. In that regard, the Committee is concerned that the State party's Supreme Court has ruled that non incorporated treaties do not have the same status in</p>	Country	Specified risk on discrimination of women

	<p>national law as incorporated treaties. The Committee reiterates that, the special self-governing and autonomous status of the territories of Greenland and the Faroe Islands notwithstanding, the primary responsibility for ensuring the implementation of the Convention across its territory remains with the State party. The Committee is also concerned at the absence of legislation for the general prohibition of all forms of discrimination against women covered under the Convention and of a comprehensive law on the prohibition of discrimination covering all internationally recognized grounds. The Committee is concerned that that situation could result in legal ambiguity and inconsistency in addressing the rights of women belonging to disadvantaged or marginalized groups who face intersecting forms of discrimination.</p> <p>“Employment</p> <p>29. The Committee welcomes the establishment in 2011 of a tribunal for equal pay, but remains concerned at:</p> <p>(a) The persistent gender wage gap and the lack of legal obligations that require transparency, including on comparative figures in individual cases, on the part of employers regarding data on remuneration; the lack of legal clarity on the definition of work of equal value; and the lack of information on successful cases seeking redress and compensation for gender-based wage differences;</p> <p>(b) The concentration of women in part-time work, which adversely affects their career development and pension benefits;</p> <p>(c) The absence of clearly defined sanctions for companies that fail to meet targets for equal gender representation;</p> <p>(d) The prevalence of de facto employment discrimination relating to pregnancy and childbirth;</p> <p>(e) The lack of legal obligations on public authorities to promote gender equality in the context of public procurement.”</p>	Country	Specified risk on gender wage discrimination
Human Rights Watch: http://www.hrw.org/	No information on specified risks in Denmark found.	Country	Low risk
Child Labour Index 2014 produced by Maplecroft. http://maplecroft.com/portfolio/new-analysis/2013/10/15/child-labour-risks-increase-china-and-russia-most-progress-shown-south-america-maplecroft-index/	Denmark scores ‘low risk’ on the Child Labour Index.	Country	Low risk on child labour
http://knowledge.verite.org/#/map	Denmark is not mentioned on this site.	Country	Low risk on forced labour
The ITUC Global Rights Index ranks 139 countries against 97 internationally recognised indicators to assess where workers’ rights are best protected, in law and in practice. The Survey provides information on violations of the rights to freedom of association, collective bargaining and strike as defined by ILO Conventions, in particular ILO Convention Nos. 87 and 98 as well as jurisprudence developed by the ILO supervisory	Denmark is classified in category 1: “Irregular Violation of Rights” which is the category with the least violations. “Collective labour rights are generally guaranteed. Workers can freely associate and defend their rights collectively with the government and/or companies and can improve their working conditions through collective bargaining. Violations against workers are not absent but do not occur on a regular basis.”	Country	Low risk on violations of the rights to freedom of association, collective

mechanisms. There are 5 ratings with 1 being the best rating and 5 being the worst rating a country could get. http://www.ituc-csi.org/new-ituc-global-rights-index-the?lang=en			bargaining and strike
Gender wage gap (in OECD countries) http://www.oecd.org/gender/data/genderwagegap.htm	The gender wage gap in Denmark in 2014 (latest year) was 7.80%. The OECD average was 15.46%. (Full-time employees. The gender wage gap is unadjusted and defined as the difference between male and female wages divided by the male median wages.)	Country	Low risk on gender wage discrimination
World Economic Forum: Global Gender Gap Index 2014 http://reports.weforum.org/global-gender-gap-report-2014/rankings/ Search for country rankings for the adjusted and the unadjusted pay gap	<i>Global Gender Gap Index 2014.</i> The highest possible score is 1 (equality) and the lowest possible score is 0 (inequality) http://reports.weforum.org/global-gender-gap-report-2014/economies/#economy=NOR Denmark ranks no. 5 out of 142 countries for the overall Gender Gap Index with a score of 0.803. Denmark ranks no. 12 for the more specific sub-index on Economic participation and opportunity out of the 142 countries that were included. Within that index, the most specific and most relevant indicator is the Wage equality for similar work . Here Denmark ranks no. 38 out 142 countries with a score of 0.71.	Country	Low risk on gender wage discrimination
use, if applicable: http://www.ilo.org/global/publications/books/WCMS_324678/lang-en/index.htm <i>Global Wage Report 2014/15</i> “The Global Wage Report 2014/15 analyses the evolution of real wages around the world, giving a unique picture of wage trends and relative purchasing power globally and by region.”	The actual gender wage gap minus the explained gender wage gap (taking into account i.e. education, experience, economic activity, location, work intensity and occupation) for Denmark is 25% (13% plus (minus minus) 12%). This percentage represents the unexplained gender wage gap which may capture discriminatory practices. The average unexplained gender wage gap for Europe is 20%. (Figure 37, p. 49) According to communications with FSC Denmark, the Danish national center for social research (SFI) does not support the specified risk conclusion for gender wage discrimination presented above: The analysis related to gender wage gap was sent to SFI to be evaluated by a senior researcher. The response was that they don't have any new numbers on the size of the unexplained wage gap in Denmark, but that they calculated the size of the is wage gap for every year in the period 1997-2011, and they did not get anywhere near the 25 pct. which are mentioned in “The Global Wage Report 2014/15”. SFI's analysis found that the difference in salary was 13-17 pct. in 2011, while the unexplained salary difference was 4-7 pct. (see https://pure.sfi.dk/ws/files/202834/1324_Loenforskelle.pdf page 16, third paragraph)	Country	Specified risk on gender wage discrimination Low risk on gender wage discrimination

	<p>It may be worth noting that in Denmark the labor participation rate for women is 75 pct (https://stats.oecd.org/Index.aspx?DataSetCode=LFS_SEXAGE_I_R). That is the 4th highest in the world (after Sweden, Norway and Iceland).</p>		
<p>Google the terms '[country]' and one of following terms 'violation of labour rights', 'child labour', 'forced labour', 'slave labour', 'discrimination', 'gender pay/wage gap, 'violation of labour union rights' 'violation of freedom of association and collective bargaining'</p>	<p>http://www.movehub.com/sites/default/files/main_images/Gender%20pay%20gap.jpg <i>Percentage pay gap around the world</i> On this map, Denmark is categorized in having a gender pay gap of 10-15%. In the table, Denmark is ranked no. 31 of 40 (with no. 1 having the biggest gender pay gap) with a gender pay gap of 11.8%.</p> <p>http://ec.europa.eu/justice/gender-equality/files/gender_pay_gap/gpg_country_factsheet_dk_2015_en.pdf <i>European Commission. The gender pay gap in Denmark.</i> "The gender pay gap is the difference in average gross hourly wage between men and women across the economy. In Denmark, the gender pay gap stands at 16.4% (the average gender pay gap in the EU is 16.3%)."</p> <p>http://www.thelocal.dk/20160218/19-children-trafficked-to-denmark-for-prostitution-theft-forced-labour The LOCAL.dk <i>Children trafficked to Denmark for sex and forced labour. Published: 18 Feb 2016</i> "The Anti-Human Trafficking Centre (Socialstyrelsens Center mod Menneskehandel) registered 19 minors smuggled into Denmark since 2009, according to a report. According to the report, the children, the youngest of which was a 12-year-old boy, were brought to Denmark for prostitution, theft or forced labour. Of the nineteen, nine were forced to carry out theft – in the form of pickpocketing – while three were forced into cleaning work in restaurants. Seven were forced into selling sex, according to Metroxpress."</p> <p>http://hrbcountryguide.org/2014/02/forced-labour-denmark/ Human Rights and Business Country Guide <i>News. Trafficking on Trial in Denmark</i> "This week in Denmark, two men and a woman are on trial for allegedly trafficking nine Romanian workers to Denmark and subjecting them to forced labour for six years. The Romanian workers were taken to the city of Elsinore, imprisoned in a garage and forced to work as cleaners for up to 20 hours per day. It is Denmark's first human trafficking trial not involving prostitution."</p>	<p>Country</p> <p>Country</p> <p>Country</p> <p>Country</p>	<p>Low risk on gender wage discrimination</p> <p>Specified risk on gender wage discrimination</p> <p>Low risk on child/forced labour in forestry sector</p> <p>Low risk on child/forced labour in forestry sector</p>

	<p>Kevin Bales, a professor at University of Hull's Wilberforce Institute for the Study of Slavery and Emancipation, interviewed by Amnesty International, says that this is not an isolated incident.</p> <p>Bales, who co-founded the organisation Free The Slaves, told Amnesty International's monthly magazine that there are around 700 slaves in Denmark, while the global figure is between 20 and 30 million. These figures are presented in the Global Slavery Index, for which Bales was the lead researcher. By comparison, the index estimates around 1,200 slaves in Sweden and around 600 in Norway.</p> <p>According to Bales, slavery in Denmark and other western countries takes place behind the closed doors of factories, hotels, restaurants, brothels and private homes.</p>	Country	Low risk on child/forced labour in forestry sector
Additional general sources	Additional specific sources		
<p>From national CW RA: FSC Controlled Wood risk assessment FSC-CW-RA-019-DK V1-0 SPECIFIC REQUIREMENTS INTERPRETATION OF ANNEX 2B OF THE STANDARD FOR COMPANY EVALUATION OF FSC CONTROLLED WOOD FOR DENMARK (FSC-STD-40-005-V-2.1) Approval date: 20 October 2014 Effective date: 20 October 2014</p>	<p>2.3 There is no evidence of child labor or violation of ILO Fundamental Principles and Rights at work taking place in forest areas in the district Concerned: Low risk</p> <p>Evidence: No evidence of child labor or violation of ILO fundamental principles is known to occur in Denmark.</p> <p>There are a number of laws and agreements regulating the Danish labor market included youth labor, and the law is enforced (refer to category 1 assessment).</p> <p>Sources of information: The eight core ILO conventions have been ratified by Denmark and is enforced via Danish legislation. http://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102609</p>	Country	Low risk on child labour
<p>Conclusion on Indicator 2.2:</p> <ul style="list-style-type: none"> - There is evidence that the rights like freedom of association and collective bargaining are upheld in Denmark. - There is no evidence confirming significant child labour or forced labour in Denmark. No evidence was found of cases of child labour nor of forced labour in the forest sector in Denmark. - Different sources report different numbers for the gender wage gap in Denmark. However, most sources, including the Danish national center for social research, provide evidence that Denmark is within the world's countries with the most equal pay. This conclusion is supported by FSC Denmark. Additionally, there is no specific evidence of gender wage discrimination in the forest sector. - No evidence for other discrimination in the labour market in Denmark was found in general nor in the forest sector specifically. <p><u>'Low risk' thresholds 10 and 12 apply:</u> (10) Applicable legislation for the area under assessment covers the key principles recognized in the ILO Fundamental Principles and Rights at work (which are recognized as: freedom of association and right to collective bargaining; elimination of forced and compulsory labour; eliminations of discrimination in respect of employment and occupation; and effective abolition of child labour), AND the risk assessment for relevant indicators of Category 1 confirms enforcement of applicable legislation ('low risk') AND</p>		Country, excluding Greenland and Faroe Islands	Low risk

(12) Other available evidence do not challenge a 'low risk' designation.

Indicator 2.3. The rights of Indigenous and Traditional Peoples are upheld.

Guidance:

- Are there Indigenous Peoples (IP), and/or Traditional Peoples (TP) present in the area under assessment?
- Are the regulations included in the ILO Convention 169 and is UNDRIP enforced in the area concerned? (refer to category 1)
- Is there evidence of violations of legal and customary rights of IP/TP?
- Are there any conflicts of substantial magnitude [footnote 6] pertaining to the rights of Indigenous and/or Traditional Peoples and/or local communities with traditional rights?
- Are there any recognized laws and/or regulations and/or processes in place to resolve conflicts of substantial magnitude pertaining to TP or IP rights and/or communities with traditional rights?
- What evidence can demonstrate the enforcement of the laws and regulations identified above? (refer to category 1)
- Is the conflict resolution broadly accepted by affected stakeholders as being fair and equitable?

general sources from FSC-PRO-60-002a V1-0 EN	information found and specific sources	scale of risk assessment	risk indication
ILO Core Conventions Database http://www.ilo.org/ilolex/english/docs/declworld.htm - ILO Convention 169	http://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102609 Denmark signed ILO Convention 169. The status of the convention is 'in force'.	Country	Low risk
Survival International: http://www.survivalinternational.org/	No sources mention IP/TP presence in Denmark , neither the sources that give overviews, such as The Indigenous World, nor could any report or website be found mentioning or claiming IP/TP presence or a discussion or debate about such a presence.	Country, not including Greenland and Faroe Islands	Low risk
Human Rights Watch: http://www.hrw.org/			
Amnesty International http://amnesty.org			
The Indigenous World http://www.iwgia.org/regions			
United Nations Special Rapporteur on the rights of indigenous peoples http://www.ohchr.org/en/issues/ipeoples/srindigenouspeoples/pages/sripeoplesindex.aspx			
UN Human Rights Council Universal Periodic Review http://www.ohchr.org/EN/HRBodies/UPR/Pages/Documentation.aspx			
UN Human Rights Committee http://www.ohchr.org/EN/HRBodies/CCPR/Pages/CCPRIndex.aspx search for country Also check: UN Committee on the Elimination of All Forms of Racial Discrimination http://www.ohchr.org/EN/HRBodies/CERD/Pages/CERDIndex.aspx			

Intercontinental Cry http://intercontinentalcry.org/ http://www.scribd.com/doc/216154458/Indigenous-Struggles-2013			
Forest Peoples Programme: www.forestpeoples.org FPP's focus is on Africa, Asia/Pacific and South and Central America.			
Society for Threatened Peoples: http://www.qfbv.de/index.php?change_lang=english			
Regional human rights courts and commissions: - Inter-American Court of Human Rights http://www.corteidh.or.cr/index.php/en - Inter-American Commission on Human Rights http://www.oas.org/en/iachr/ http://www.oas.org/en/iachr/indigenous/ - African Commission on Human and Peoples' Rights - African Court on Human and Peoples' Rights - European Court of Human Rights			
Data provided by National Indigenous Peoples', Traditional Peoples organizations;			
Data provided by Governmental institutions in charge of Indigenous Peoples affairs;			
Data provided by National NGOs; NGO documentation of cases of IP and TP conflicts (historic or ongoing);			
National land bureau tenure records, maps, titles and registration (Google)			
Relevant census data			
- Evidence of participation in decision making; (See info on implementing ILO 169 and protests against new laws) - Evidence of IPs refusing to participate (e.g. on the basis of an unfair process, etc.); (See info on implementing ILO 169 and protests against new laws)			
National/regional records of claims on lands, negotiations in progress or concluded etc.			
Cases of IP and TP conflicts (historic or ongoing).) Data about land use conflicts, and disputes (historical / outstanding grievances and legal disputes)			
Social Responsibility Contracts (<i>Cahier des Charges</i>) established according to FPIC (Free Prior Informed Consent) principles where available			

Google the terms '[country]' and one of following terms 'indigenous peoples organizations', 'traditional peoples organizations', 'land registration office', 'land office', 'indigenous peoples', 'traditional peoples', '[name of IPs]', 'indigenous peoples+conflict', 'indigenous peoples+land rights'			
Additional general sources for 2.3	Additional specific sources	scale of risk assessment	risk indication
From national CW RA: FSC Controlled Wood risk assessment FSC-CW-RA-019-DK V1-0 SPECIFIC REQUIREMENTS INTERPRETATION OF ANNEX 2B OF THE STANDARD FOR COMPANY EVALUATION OF FSC CONTROLLED WOOD FOR DENMARK (FSC-STD-40-005-V-2.1) Approval date: 20 October 2014 Effective date: 20 October 2014	<p>2.4 There are recognized and equitable processes in place to resolve conflicts of substantial magnitude pertaining to traditional rights including use rights, cultural interests or traditional cultural identity in the district concerned: Low risk Evidence: The legal system in Denmark provide a robust framework to resolve conflicts related to traditional rights including use rights, cultural interests or traditional cultural identity in the district concerned. No conflicts of substantial magnitude related to traditional rights in Denmark have been found to be reported. Sources of information: Danish forest legislation, working environment legislation and social structure in general. www.transparency.org www.illegal-logging.info www.eia-international.org</p> <p>2.5 There is no evidence of violation of the ILO Convention 169 on Indigenous and Tribal Peoples taking place in the forest areas in the district concerned: Low risk Evidence: In Denmark there are no ethnic groups, which can be characterized as "indigenous or tribal" as defined in the Revised P&C (FSC-STD-01-001 V5-0). Violation of ILO Convention 169 and the rights of Indigenous and Tribal people is therefore not relevant in Denmark. ILO Convention 169 is further ratified by Denmark. Sources of information: Definition of Indigenous and Tribal Peoples as defined in the Revised P&C (FSC-STD-01-001 V5-0)</p>	Country	Low risk
Conclusion on Indicator 2.3: There are no indigenous peoples and no traditional peoples in Denmark. Therefore, the following 'low risk' thresholds apply: (16) There is no evidence leading to a conclusion of presence of indigenous and/or traditional peoples in the area under assessment; AND (21) Other available evidence do not challenge 'low risk' designation.		Country, excluding Greenland and Faroe Islands	Low risk

Controlled wood category 3: Wood from forests in which high conservation values are threatened by management activities

Overview

Denmark's terrestrial environment is divided between two EU biogeographical regions by means of a north-south divide through the middle of the Jutland Peninsula: 1) the Atlantic region, covering the western part of Jutland and 2) the Continental region covering the eastern part of Jutland and Denmark's islands.

In the early 1800s, the forest cover in Denmark is estimated to have been as low as approximately 4% of the total land area. Deforestation was caused by logging for timber and firewood and to create animal grazing areas. Denmark's first forest legislation came into force in 1805. Its main objective – as well as the objectives of subsequent Danish forest legislation – has been to maintain the forested area and to protect the existing forest from overexploitation, premature felling and grazing by farm animals. In the mid-nineteenth Century, intensive forest management became widespread and large afforestation projects were carried out. Today approximately 13% (615,000 hectares) of Denmark's land area is covered by various types of forest.

According to the Danish National Forest Inventory (conducted by the Danish Nature Agency), 41% of Denmark's forest area is dominated by deciduous trees, 39% by coniferous tree species, 11% by mixed coniferous and deciduous tree species, 5% is Christmas tree plantation (located within all the above forest types) and 4% of the area is unstocked, e.g. log loading and landing yards, fire prevention areas etc. Furthermore, 67% of the Danish forest area is covered with even-aged, planted stands; with 9% being even-aged stands from natural regeneration and 6% being uneven-aged natural forest. The latter represent pocket of forest that would be closest to what is considered natural forest stands, having retained or regained natural forest characteristics. These pockets can be found in forests under both private and public ownership and are predominantly located in the Continental region (eastern Jutland and the islands). The locations of these natural forest stands are generally well-known, but some may still be unidentified.

Of Denmark's 615,000 hectares of forest, 440,000 hectares are managed as forest reserves (called 'fredskov' in Danish), governed under the Danish Forest Act 2004. The Forest Act permits forest management activities within these areas; however, Article 8 (see Category 1 for more details) requires that the managed area shall maintain continuous forest cover, that a maximum of 10% of the forest area can be used for short-rotation Christmas trees or greenery production (e.g. cuttings, typically from *Abies procera*), and another maximum of 10% of the area can be used for coppicing or for animal forest grazing. The Forest Act also protects streams and wetlands in forests that are not covered by the Nature Protection Act nor managed by the Ministry of the Environment and Food or local authorities. The Act stipulates that lakes, bogs, heaths, species-rich grasslands, coastal grasslands and swamps located in 'fredskov' forest reserves may not be planted or cultivated, drained or in any way modified. It is also important to note that the Forest Act does not include many measures relating to forestry techniques, e.g. harvesting, planting or thinning (also see Category 1).

There are 79,000 hectares of forests designated as Natura 2000 areas (13% of the Danish forest area), which have some overlap with the 74,900 hectares of forests and other natural areas designated under the EU Habitats Directive, 51,500 hectares under the EU Birds Directive and 13,900 hectares as Ramsar sites. Depending on the status of the forest as protected (Fredskov) or not, notification must be sent to the the Danish Nature Agency or to the local municipality, to conduct forest management activities within Natura 2000 forests that may adversely affect Natura 2000 areas; permission is given with the proviso that the natural condition of the forest will not deteriorate.

In relation to HCV Categories 1 and 3, it is worth noting that although the Forest Act Article 25 sets provisions for registering especially valuable forests i.e., valuable in terms of their biodiversity and conservation value, and requires that appropriate conservation management activities occur in these areas, these forests have not yet been registered by the Danish Nature Agency. Danish forest biodiversity and conservation values have been surveyed by the Department of Geosciences and Natural Resource Management at Copenhagen University using a sampling methodology. Therefore, not all forest management areas have been systematically surveyed, particularly small privately owned forest areas. Through this sampling program, biodiversity and conservation values of the sampled forests have been documented under the Danish National Forest Inventory (NFI) hosted by the Danish Nature Agency. The task of systematically surveying 'especially valuable forests' will be carried out by the Danish Nature Agency in the years 2016-2019.

Forest ownership in Denmark is divided as private forests owners: 70%, State and Municipal owners: 24%, trust funds or foundations: 4%, and unknown owners: 2%.

Biodiversity in Danish forests

Given the historical context, most Danish forests have been exposed to some level of forest management activities, varying from low impact to very intensive forestry. Today, most of Denmark's forests are semi-natural ecosystems composed of either native or exotic tree species, interspersed with a few small pockets of (recovered or remnant) natural forest stands. Although the forest area has increased over the last two centuries – from 3-4% to more than 14% – the natural values of the pre-1800 forest stands have decreased significantly. This is due to intensive forest management practices aiming to manage even-aged, single-tree species stands. Examples of some the detrimental effects of intensive forest management practices include modification of natural hydrology (depletion or drainage), extensive soil cultivation, eutrophication, removal of mature and over-mature trees and deadwood, replacement of semi-natural or natural forest stands with exotic species, coppicing and animal grazing.

Since the mid-1990s, forestry practices in Denmark, especially in State- and Municipal-owned forests, have shifted from traditional, production-oriented forest management towards management regimes with a wider set of goals for conservation, biodiversity, recreation – as well as addressing other social needs such as preserving cultural heritage sites.

Approximately 32,000 species of animals, plants and fungi are found in Denmark and, during the period 2003-2010, over 1,500 were assessed as being in danger of extinction from the Danish countryside. These species are listed in the National Red List of endangered, vulnerable or rare species. The main processes threatening species survival in Denmark are habitat degradation and fragmentation. Forests in Denmark hold the highest proportion of Red List species compared to other Danish habitat types.

Denmark ratified the Convention on Biological Diversity in 1994. Today more than 8% of Denmark's terrestrial area is protected, with one-third classified as IUCN Categories I and II; of which a large proportion is protected under the Nature Protection Act and the Natura 2000 EU Habitats Directive. These areas have been designated specifically to protect species, landscapes, cultural heritage and/or for scientific research and/or education purposes – and cover approximately 5% of the country's terrestrial area. Furthermore, areas enjoying protection under the Forest Act, Natura 2000 and/or the Nature Protection Act are also mapped with details available online via the Danish Nature Agency's digital nature map. Lastly, Nature Protection Act Article 3 also protects key ecosystems/habitats such as bogs, swamps, meadows and Forest Articles 26 – 27 protects key habitats such as oak-bushes, forest edges and heaths. Biodiversity data is updated regularly by the Danish Nature Agency and, as mentioned above, the Agency will be completing the survey of 'especially valuable forests' in the period 2016-2019.

Danish forests house numerous legally protected archaeological, heritage and cultural sites of national importance including one forest area in North Zealand which is listed as UNESCO World Heritage due to its historical significance.

Experts consulted

	Name	Organization	Area of expertise (category/sub-category)
1.	Jakob Ryding	Forests of the World	Forest Ecology / Policy
2.	Tanja Olsen	Forest Owners Association	Forest management and certification
3.	Hans M. Hedegaard	Forest Owners Association	Forest management and policy
4.	Nora Skjernaa Hansen	Danish Nature Conservancy Trust	Forest Ecology / Policy
5.	Peter Friis Møller	GEUS/Skov- og Naturrådgivning	Forest Ecology
6.	Flemming Rune		Forest Biology and Ecology
7.	Niels Bølling	Danish Nature Agency	Forest Legality and Law enforcement
8.	Mads Brinck Lilleund	Danish Nature Agency	Forest Legality and Law enforcement

Risk assessment

Indicator	Sources of Information	HCV occurrence and threat assessment	Functional scale	Risk designation and determination
3.0	N1-40, 42, consultations with forest ecologist (Peter Friis Møller) and two consulted environmental Non-Governmental Organizations (NGOs) (the Forests of the World, and the Danish Nature Protection Society)	<p>Danish forests have been surveyed by the Department of Geosciences and Natural Resource Management at Copenhagen University by means of a sampling methodology and documented under the Danish National Forest Inventory (NFI) hosted by the Danish Nature Agency.</p> <p>As Danish forests have been well-researched and significant conservation values have been identified, it can be concluded, based on consultations with experts, that there are no major knowledge/ data gaps in relation to important HCV areas.</p> <p>All forest areas that are critical to conservation are designated as protected areas at national or EU level (Natura 2000), but further identification of 'especially valuable forests' is a goal of the most recent Danish Forest Act (Article 25). The plans for this project were initiated in early 2016, with the work by the Danish Nature Agency expected to be concluded in 2019. It is possible that this project will identify in small forests that were previously under moderate forest management – key habitats with biodiversity values, e.g. species richness or support of a single, important, rare, threatened or endangered species.</p>	Denmark	Low risk

		<p>For the current assessment, HCVs as identified in the FSC Danish HCV guidance are follows:</p> <p>HCV 1 –</p> <ul style="list-style-type: none"> • Habitats / breeding /resting places for conservation-reliant and red-listed plant and animal species, i.e.: <ul style="list-style-type: none"> • Conservation-reliant species and their habitat areas listed within the Habitats Directive Annex II, IV and V and the Birds Directive Annex I and also documented on the Danish Nature Agency's website. • Endangered and rare species and their habitat areas on the Danish Red List <p>HCV 2 – large woodland territories: N/A – as according to FSC's HCV 2 definition, Denmark does not contain these types of forests.</p> <p>HCV 3 –</p> <ul style="list-style-type: none"> • The N2000 nature types/habitat types, which form the basis for appointing the Natura 2000 areas. • Protected areas/habitats conserved under the Nature Conservation Act Article 3 and the Forest Act Articles 25-2 such as: Protected lakes, streams, moors, marshes, salt marshes, fresh meadows and grasslands, Oak forests and deciduous forests and shrubs edges. • Key biotopes as defined in the Danish HCV-guidance. (See 'katalog 24'). <p>HCV 4 –Areas of drinking water interests (OD areas), special drinking water interests (OSD areas) and specifically areas designated as near-well protected areas (Borningsnære Beskyttelsesområder – BNBO).</p> <p>HCV 5 – Forest sites and resources are not fundamental for meeting the basic necessities for communities in Denmark. Forests protected by the Forest Act, also provides a basic protection of local communities' needs. Therefore it is concluded this category of HCV is not applicable in the Danish context.</p>		
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		<p>HCV 6 – Areas with significant national cultural and historical values, including ancient burial mounds and other archaeological sites, but also early industrial sites and other significant cultural sites.</p> <p>A key challenge is that a clear definition of HCVs in the Danish forest context, supported by researchers and key stakeholders, is not in place. There is consensus – based on expert consultation carried out during this assessment – that all major HCV areas are identified; but due to the history and intensity of forest management in Denmark, even small forest areas (stands/ compartments or smaller sites) act as key biotopes and are important for the recovery of Red List species and maintaining biodiversity in Denmark’s forests. Furthermore, one consulted key forest ecology expert (Peter Friis Møller) and two consulted environmental Non-Governmental Organizations (NGOs) (the Forests of the World, and the Danish Nature Protection Society) contend that – for the most part – smaller, privately held forest estates in Denmark have undertaken very limited forest management activities and therefore may support, at least locally, significant concentrations of species and/or qualify as a WKH. These experts also claim that the smaller private forest owners may not be aware of HCVs within their forests, and that these potential natural values may be under threat by forest management activities due to lack of knowledge and awareness of the presence of HCVs.</p> <p>All State-owned forest enterprises are FSC- and PEFC-certified. An analysis of publicly available certification report summaries showed that there are no or only very minor issues related to HCVs in State forests by forest management activities (42).</p> <p>As the data available are sufficient for determining HCV presence within the area under assessment and the data available are sufficient for assessing threats to HCVs caused by forest management activities this indicator is designated as Low risk. (“Low risk” threshold (1) and (2) is met).</p>		
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3.1 HCV 1	1,3,6 – 16, 18-25, 37,38,42	<p>HCV Occurrence</p> <ul style="list-style-type: none"> • Habitats / breeding /resting places for conservation-reliant and red-listed plant and animal species • Conservation-reliant species listed within the Habitats Directive Annex II, IV and V and the Birds Directive Annex I and also documented on the Danish Nature Agency's website. • Endangered and rare species on the Danish Red List. <p>There are no significant concentrations of endemic species within forest ecosystems in Denmark; and nationally significant temporal use areas (key sites for migrating birds, as indicated by recognised Important Bird Areas) largely consist of non-forest areas. Thus, this risk assessment focuses on areas of significance for RTE species dependent on forest habitats and ecosystems.</p> <p>Using a precautionary approach, Danish forests do contain areas that are at least nationally significant due to their biodiversity values. Many species are dependent on forests for survival, and the forests with the following characteristics have particular potential for high biodiversity:</p> <ul style="list-style-type: none"> *Old and dying trees of native species *High volumes of deadwood (including snags and coarse woody debris) *Forests dominated by natural forest dynamics *Natural regeneration *Areas with high soil moisture/ natural hydrology levels <p>The Danish Forest Act Article 15 stipulates that the Ministry of the Environment and Food is responsible for mapping the location and designating the conservation status of habitat types and species in Denmark according to the definitions listed in the EU Habitats Directive Annexes I and II, and in Annex I of the EU Birds Directive. The Ministry of the Environment and Food is also responsible for establishing national objectives and the means for achieving them to ensure a positive trend associated with Denmark's nature conservation and biodiversity status.</p> <p>Most identified important conservation forest areas are designated as protected areas under national legislation. However, further identification of 'especially valuable forests' through a systematic approach, a goal described in the most</p>	<p>Privately owned forests</p> <p>All other forests.</p>	<p>Specified risk: Privately owned forests without a green management plan</p> <p>Low risk: All other forests.</p>
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		<p>recent Danish Forest Act Article 25, will be initiated by the Danish Nature Agency in early 2016 and is expected to be concluded by 2019. The goal is to systematically identify and map these 'especially valuable forests' both within and outside existing Natura 2000 areas, and in both publicly and privately managed forests. The Forest Act Article 25 also identifies provisions for the Ministry of the Environment and Food to enter into agreements with the forest owners about forest management in the identified areas of 'especially valuable forests', so that forest management will support and improve biological diversity conservation.</p> <p>It is important to note that a new scientific method for creating a High Nature Value (HNV) map of potential areas containing high nature values has recently been published, but at the time of writing this report (January 2016), the digital map was not yet online. A preliminary informal evaluation shows that the areas for which there is the strongest indication of high biodiversity scores are predominantly located in existing Natura 2000 areas.</p> <p>Threats & Safeguards identification and evaluation</p> <p>Woodland key habitats for Red List species in Danish forests are potentially threatened by forest management practices such as removal or destruction of habitat in forest reserves. To a lesser degree, habitat fragmentation also poses a threat to Red List species dependent on forest areas for survival. The use of exotic tree species is widespread in Danish forestry.</p> <p>The legislative framework that is generally well-respected in Denmark offers protection to some, but not all, woodland key habitats, e.g. while wetland habitats in and around forests are protected by the Nature Protection Act Article 3, there is no specific protection for recovered natural forest stands nor stands dominated by old (over-mature) trees – despite the fact that these ecosystems are biodiverse and often contain important habitat features.</p>		
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		<p>The Forest Act Article 15 stipulates that the Ministry of the Environment and Food shall map the location and conservation status of habitat types and species listed in accordance with the EU Habitats Directive Annexes I and II and Annex I of the EU Birds Directive. The Ministry is also responsible for establishing management objectives necessary to ensure or regain a positive nature conservation and biodiversity status for Denmark; and must also provide the necessary support to reach these objectives.</p> <p>The Forest Act Article 25 provides an opportunity for the Ministry of the Environment and Food to register other 'especially valuable forests' that are not covered by the mapping under Article 15. Note it is presumed forest owners will enter into agreements with the Ministry to ensure that future forest management will support and promote biological conservation. The survey of 'especially valuable forest' will take place from 2016–2019.</p> <p>There are limited commercial incentives for forest management to harvest and destroy recovered or remnant natural forest stands or stands dominated by over-mature trees. Moreover, due to their relative rarity, these stands (when known) generally enjoy the protection of forest owners.</p> <p>For all forests under regular or periodic qualified forest management due to forest management planning practices, that the necessary information is available, with regards to stand age and potential 'near-natural' status, to identify key biotopes. Many forest estates, whether publicly or privately owned, have also implemented a green management plan, which will include a survey of key biotopes. If key biotopes are identified, then the forest managers are required to implement safeguards to conserve their values.</p> <p>Thus, HCV 1 are not threatened by forest management activities in forest reserves covered by a green management plan. Therefore, for forest reserves covered by a green management plan [or "for these areas"], the risk for this indicator has been assessed as low.</p>		
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		<p>However, since no comprehensive national survey of HCVs has been undertaken for all Danish forests, it is not unlikely that woodland key habitats are present in small, privately held forest estates, but not yet known by the owner. The risk of the forest owner initiating a forest operation in stands where HCVs are present and their forest management activities threatening HCV 1 through habitat removal, fragmentation and/or the encroachment of invasive species can therefore not be ruled out. We therefore classify privately owned forests without a green management plan as at Specified Risk of HCV 1 values being potentially threatened by forest management activities.</p> <p>Given all state-owned forest enterprises are FSC (and PEFC) certified, it is assumed the HCV 1 values are maintained under FSC certification.</p> <p>HCV 1 is identified and its occurrence is likely in the area under assessment, but it is effectively protected from threats from management activities for state forest enterprises and privately owned forests with green management plans thus is Low risk (Low risk threshold (7) is met). However, for privately forest owned forest without a green management plan HCV 1 is threatened by management activities and thus is Specified risk (Specified risk threshold (8) is met).</p>		
3.2 HCV 2	11, 28, 29	<p>HCV 2 are present as large landscape level forests in National parks but as forest management is prohibited in these parks there is a low risk of forest management threatening these HCV 2 values.</p> <p>Outside National parks HCV 2 is not present in the area under assessment where forest management is present</p> <p>HCV 2 is identified and it is effectively protected from threats caused by management activities. ("Low risk" threshold (11) is met).</p>	Denmark	Low risk

3.3 HCV 3	1–5,7,14,15,17,27,28,37,38,42	<p>HCV Occurrence</p> <p>Natura 2000 Denmark has designated 252 Natura 2000 sites. Natura 2000 sites include the Habitats and Birds Directive, and subsequently the majority of WKH, and Ramsar sites. These sites are assigned to protect selected species and habitats. One can determine if a forest management area overlaps a Natura 2000 area through checking the 'Natura 2000' by The Digital Nature Maps (see. FSC Denmark's HCV Guidance Annex 1) under 'Existing natural and protected area'</p> <p>Protected areas and habitats:</p> <ul style="list-style-type: none"> • Protected lakes, streams, moors, marshes, salt marshes, fresh meadows and grasslands conserved under the Nature Conservation Act Article 3. • Oak forests are preserved under Forest Act Article 26. • Deciduous forests and shrubs ecotones are conserved under Forest Act Article 27. • Registered especially valuable forests under Forest Act Article 25. <p>Key biotopes Many, but not all, key biotopes will be Natura 2000 habitat types and/or protected or registered areas and habitats. The Danish Agency 2016-2019 survey will identify all key biotopes in Denmark.</p> <p>Threats & Safeguards identification and evaluation</p> <p>When forest management areas overlap with Natura 2000 areas the forest operation must have a Forest Action plan describing how habitat and species will be protected. According to the Forest Act Article 17 before any 'accepted' operational activities to take place in Natura 2000 areas the forest manager must notify and seek permission from the Danish Nature Agency. Moreover, the status and development in the Natura 2000 areas is monitored under the NOVANA program, which is the</p>	<p>Privately owned forests</p> <p>All other forests</p>	<p>Specified risk: Privately owned forests without a green management plan</p> <p>Low risk: All other forests</p>
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		<p>national program for monitoring of nature and aquatic environments. Overall the monitoring program – as well as and cross referencing to consultations with key forest and conservation experts – indicates there is a sufficient level of protection for the Natura 2000 HCV 3-related values. Protected habitats are generally respected according to the relevant articles listed above.</p> <p>Lastly, significant number of forest estates, whether publicly or privately owned, have also implemented a green management plan, which will include a survey of key biotopes. Thus, HCV 3 are not threatened by forest management activities in forest reserves covered by a green management plan as the plan should take into account the conservation of key biotopes. Therefore, for forest estates covered by a green management plan, the risk for this indicator has been assessed as Low risk. However, since no comprehensive national survey of HCVs has been undertaken for all Danish forests, it is likely that key biotopes are present in small, privately held forest estates, but not yet known by the owner. The risk of the forest owner initiating a forest operation in stands where HCVs are present can therefore not be ruled out and as the overview explains there still is not sufficient protection of HCVs in Demark so HCV 3 forests can be threatened by forest management activities through habitat removal and/or habitat fragmentation and/or other habitat degrading features such as the encroachment of invasive species. We therefore classify privately owned forest reserves without a green management plan as at Specified Risk of HCV 3 values being potentially threatened by forest management activities.</p> <p>Additionally, Denmark ratified the Convention on Biological Diversity in 1994. According to 5th Danish Country Report to the CBD, Denmark has over 8% of its total land area protected as Natura 2000 areas and 18% of territorial waters are protected, representing good progress towards meeting Aichi Target 11; however, it does state more protected areas will be established in near future according to the 5th Danish Country Report to the Convention on Biological Diversity Denmark.</p>		
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		<p>Given all state-owned forest enterprises are FSC (and PEFC) certified, it is assumed the HCV 3 values are maintained under FSC certification.</p> <p>HCV 3 is identified and its occurrence is likely in the area under assessment, but it is effectively protected from threats caused by management activities in state-owned enterprises forests privately-owned forest managers and privately owned forests with a green management plan (Low risk threshold is met (15)) thus is Low risk. However, for privately-owned forest managers without a green management plan is Specified risk as the HCV3 values are threatened by forest management activities (Specified risk threshold (17)).</p>		
3.4 HCV 4	30, 31, 32	<p>HCV Occurrence</p> <p>In Denmark, the only critical ecosystem service provided by forests occurs within areas of drinking water interest (OD areas) or areas of special drinking water interests (OSD areas), and specifically areas designated as near-well protected areas (Borningsnære Beskyttelsesområder – BNBO). ODs and OSDs make up 87% of the Danish land area. The quality of groundwater within OSDs is monitored by GEUS, Geological Survey for Denmark. Some BNBOs are mapped (see FSC HCV guidance) and they are designated by the municipal authorities, which can also prohibit pollution within the BNBO after the Environmental Protection Act Article 24.</p> <p>Threats & Safeguards identification and evaluation</p> <p>HCV 4 are not threatened by forest management activities in Denmark, as drinking water interests are well protected by the Environmental Protection Act, the Water Sector Act and the Water Utilities Act. The Municipalities are the competent authorities in relation to drinking water interests, and the Danish Nature Agency under the Ministry of the Environment and Food monitors drinking water interests at a national level.</p>	Denmark	Low risk.

		<p>There is no evidence of forest management threats to water quality, and in fact afforestation projects are sometimes deployed with an aim to improve water quality in the area. The rates of use of pesticides and fertilizers in forestry are much lower compared to volumes used in the agricultural sector. The average annual application of pesticides (active ingredient) is 2.1 kg/ha for the agricultural sector and 0.05 kg/ha for the forestry sector; however, this does not include the annual pesticide application for Christmas trees and greenery production. Observations suggest that there is no well-known, documented evidence that Christmas tree and greenery production activities within forest reserves are threatening water quality. Additionally, leaching of nitrate from forest areas is typically in the range of 0-10 kg N/year for forests, and typically in the range of 30-120 kg N/year for agricultural land. Again, based on observations, there is no well-known documented evidence that nitrate leaching from forested areas is threatening water quality.</p> <p>There is no threat by forest management activities to Denmark's special drinking water interest areas as they are well protected by the Environmental Protection Act, the Water Sector Act and the Water Utilities Act monitored by the Danish Nature Agency under the Ministry of the Environment and Food. For HCV 4, all of Denmark is considered Low Risk.</p>		
3.5 HCV 5	1	<p>Forest sites and resources are not fundamental for meeting the basic necessities for communities in Denmark. Forests protected by the Forest Act, also provides a basic protection of local communities' needs. Therefore it is concluded this category of HCV is not applicable in the Danish context.</p> <p>In conclusion, there is no HCV 5 identified and its occurrence is unlikely in the area under assessment thus is considered Low risk (Low risk threshold (23) is met).</p>	Denmark	Low risk
3.6 HCV 6	1, 33-36,39	<p>There are almost 33,000 registered cultural heritage sites and features in Denmark, with some of these sites found in forest reserves.</p> <p>These sites are considered by the Ministry of Culture as irreplaceable and they are strictly protected. Cultural heritage</p>	Denmark	Low risk.

		<p>sites can be ancient graves and burial mounds, but may also include relicts of early settlements, fortifications, old bridges and roads, stone walls, etc.</p> <p>There are also areas with landscapes of national cultural significance. Examples of these include early industrial areas with dams, mill ponds etc.</p> <p>The 'Parforce' hunting grounds landscape of Grib Skov forest in North Zealand is listed as a UNESCO World Heritage site. This hunting landscape was created in the 1680s after a decree from King Christian the Fifth. The hunting landscape is included as a UNESCO World Heritage site due to its being a well-preserved example of a Baroque forested landscape.</p> <p>Archaeological and historical values are protected by the Museum Act, Article 8a under the Ministry of Culture. HCV 6 are generally not threatened by forest management activities in Denmark, although there have been occasional cases in recent years of damage or disturbance to historical or archaeological sites or features.</p> <p>All cultural values and features of significance are required to be registered with the Agency for Culture and Palaces under the Ministry of Culture; databases, interactive maps and GIS information are publicly available on the Agency's website.</p> <p>There are no economic incentives that would lead to, and no known cases of, forest management activities causing damage or disturbing sites or features of national cultural significance.</p> <p>The UNESCO World Heritage-listed 'Parforce' hunting landscape is contained within the Danish State Forest unit in North Zealand, and the Danish Nature Agency has maintained this landscape for more than 300 years. (Note this site became UNESCO site after the publication of the FSC Danish HCV Guidance and the guidance once updated will include reference to this site).</p>		
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		<p>Cultural heritage sites are well-documented and protected in Denmark under the Ministry of Culture and associated agencies. These sites are not systemically threatened by forest management activities in Denmark.</p> <p>In conclusion, HCV 6 is identified and its occurrence is likely in the area under assessment, but it is effectively protected from threats caused by management activities (Low risk threshold (29) is met).</p>		
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Recommended control measures

Indicator	Recommended control measures
3.1	<p>The recommended control measure is that the forest owner provides documentation verifying that they have completed a green management plan, demonstrating that any HCVs present in the forest management unit have been identified, and that sufficient measures have been taken to ensure that any identified HCV is not threatened by forest management activities.</p> <p>Or</p> <p>For small forest estates, this objective can also be achieved on an operational level through a survey of key biotopes and provision of sufficient protection for the HCVs before any operation such as a felling or thinning.</p>
3.3	<p>The recommended control measure is that the forest owner provides documentation verifying that they have completed a green management plan, demonstrating that any HCVs present in the forest management unit have been identified, and that sufficient measures have been taken to ensure that any identified HCV is not threatened by forest management activities.</p> <p>Or</p> <p>For small forest estates, this objective can also be achieved on an operational level through a survey of key biotopes and provision of sufficient protection for the HCVs before any operation such as a felling or thinning.</p>

Information Sources

No	Source of information	Relevant HCV category and indicator
1	HCV Guidance 'HCV-vejledningen'. For use in FSC certification of forests in addition to the FSC forest management standard. Updated December 2015. FSC Denmark.: https://dk.fsc.org/preview.vejledning-til-identifikation-og-operationel-hndtering-af-hje-bevaringsvaerdier-hcver-i-danmark.a-1280.pdf	HCV 1, 3, 4, 5 and 6
2	Natura2000 care plans 2016-2021: http://naturstyrelsen.dk/drift-og-pleje/natura2000-plejeplaner-2016-21	HCV 3
3	Green management plans. http://naturstyrelsen.dk/naturbeskyttelse/skovbrug/privat-skovdrift/tilskud-til-private-skove/groen-driftsplan/	HCV 1, HCV 3
4	Procedure for Natura 2000 management exemptions. http://www.naturstyrelsen.dk/Naturbeskyttelse/Natura2000/Handleplaner/	HCV 3

5	Key biotopes in forests – picture catalogue http://naturstyrelsen.dk/media/nst/67042/Noeglebiotoper_Screen.pdf	HCV 3
6	Biologisk mangfoldighed i Danmark - Status og Strategi http://www2.sns.dk/udgivelser/2003/mangfoldighed/	HCV 1
7	Standard for FSC Certificering i Danmark_korrektur 2011	HCV 1, HCV 3
8	Skovloven (Danish Forest Act) https://www.retsinformation.dk/forms/r0710.aspx?id=175267	HCV 1
9	IUCN Red List: Redlist species in Danish forest (LC excluded): http://www.iucnredlist.org/search/saved?id=67079	HCV 1
10	Vejledning om Skoloven §25: http://naturstyrelsen.dk/media/164667/vejledning-om-skovlovens-25-senest-aendret-d-18-august-2015.pdf	HCV 1
11	The Danish Redlist / Den danske rødliste / Fagdatacenter for Biodiversitet og Terrestrisk Natur (B-FDC). - Danmarks Miljøundersøgelser, [2004] http://redlist.dmu.dk	HCV 1
12	The Danish Redlist 1997, printable pdf: http://www.sns.dk/1pdf/rodlis.pdf	HCV1
13	Manual for redlisting animal and plant species in Denmark http://www.dmu.dk/1_viden/2_Publikationer/3_teknavisning/rapporter/TA20.pdf	HCV 1
14	List of Natura 2000 areas in Denmark http://naturstyrelsen.dk/media/nst/68127/Natura2000%20nr.pdf	HCV 1, HCV3
15	Danske naturtyper i det europæiske NATURA 2000 netværk http://www.sns.dk/udgivelser/2001/87-7279-400-3/helepubl.pdf	HCV 1, HCV3
16	Fourth Country Report to CBD, Denmark, Januar 2010 https://www.cbd.int/doc/world/dk/dk-nr-04-en.pdf	HCV 1
17	Oversigt over Habitatområdernes udpegningsgrundlag 31/12 2012 http://naturstyrelsen.dk/media/nst/Attachments/HabitatUdpgr201231Dec.pdf	HCV 3
18	Ændringer i Habitatområdernes udpegningsgrundlag som følge af offentlig høring 25. juni - 20. august 2012.	HCV 1
19	Oversigt over Fuglebeskyttelsesområdernes udpegningsgrundlag 31/12 2012	HCV 1
20	Ændringer i Fuglebeskyttelsesområdernes udpegningsgrundlag som følge af offentlig høring 25/6 - 20/8 2012.	HCV 1
21	NOVANA Program webiste: http://naturstyrelsen.dk/vandmiljoe/overvaagning-af-vand-og-natur/novana-program/	HCV 3
22	Online maps of Natura 2000 areas in Denmark: http://miljoegis.mim.dk/cbkort?selectorgroups=themecontainer%20Natura2000%20fredning&mapext=277608%206024994.2%201064040%206422715.8&layers=theme-gst-dtkskaerm_daempet%20ef_fugle_bes_omr%20ramsar_omr%20ef_habitat_omr%20theme-pg-natura_2000_omraader&mapheight=969&mapwidth=1925&profile=miljoegis-natura2000	HCV 1

23	Online map of Protected areas, example: http://miljoegis.mim.dk/spatialmap?selectorgroups=themecontainer%20Natura2000%20fredning&mapext=529601.6%206207816.6%20578779.2%206228475.8&layers=theme-gst-dtkskaerm_daempet%20fredede_omr&mapheight=808&mapwidth=1925&profile=miljoegis-natura2000&ignorefavorite=true	HCV 1
24	PFM Proposed tool for assessment of HNV. Extract for presentation from the Network for Forest Act §25.	HCV 1
25	Own elaboration: Comparison of HNV map hotspot with existing Natura 2000 areas.	HCV 1
26	Biodiversitetskort for Danmark. Ejrnæs et al 2014	HCV 3
27	The development of a High Nature Value map for forests in Denmark: Udvikling af et High Nature Value - HNV-Skovkort for Danmark. Johannsen et al 2015	HCV 3
28	National Forest Inventory - Skove og Plantager 2013: http://ign.ku.dk/samarbejde-raadgivning/myndighedsbetjening/skovovervaagning/skove-og-plantager-2013.pdf	HCV 3
29	Greenpeace Intact Natural Forest Landscapes http://www.intactforests.org/world.webmap.html	HCV 2
30	Skovrejsning og Grundvand http://www2.sns.dk/udgivelser/2003/skovrejsning_grundvand/helepubl.pdf	HCV 4
31	Map of Areas of Special interest for Drinking water supplies	HCV 4
32	Map of Areas of Special interest for Drinking water supplies	HCV 4
33	Museumsloven. Danish Museum act. https://www.retsinformation.dk/forms/R0710.aspx?id=162504	HCV 6
34	Example map from Danmarks Miljøportal http://arealinformation.miljoportal.dk/distribution	HCV 6
35	Example map from Danmarks Miljøportal http://arealinformation.miljoportal.dk/distribution	HCV 6
36	Article from Agency for Culture and Palaces website: Denmark suggest the Parforce hunting landscape of the North Zealand forests as UNESCO World Heritage Site. http://slks.dk/verdensarv/parforcejagtslandskabet-i-nordsjaelland/ as last seen on 19 Jan 2016.	HCV 6
37	European Commission - Birds Directive http://ec.europa.eu/environment/nature/legislation/birdsdirective/index_en.htm	HCV 1, HCV3
38	Map of distribution of Ramsar sites within the EEA member countries http://www.eea.europa.eu/data-and-maps/figures/map-of-distribution-of-ramsar-sites-within-the-eea-member-countries-open-circles-indicating-sites-designated-to-protect-threatened-species-green as last seen on 19 Jan 2016.	HCV 1, HCV3
39	UNESCO - The par force hunting landscape in North Zealand http://whc.unesco.org/en/list/1469 as last seen on 19 Jan 2016.	HCV 6
40	FSC Certificate search http://info.fsc.org/certificate.php	3.0
41	Convention on Biological Diversity, Denmark country profile: https://www.cbd.int/countries/profile/default.shtml?country=dk as last seen on 19 Jan 2016	Overview

42	Guidance on subsidies for green management plans http://naturstyrelsen.dk/media/nst/8078130/Vejledning_gr%C3%B8n_drift_2014.pdf	HCV 1, HCV3
43	Danish Nature Policy Our Shared Nature. October 2014. Danish Ministry of the Environment, Danish Nature Agency. Electronic publication 978-87-92256-98- nst.dk/naturplandk.	Overview
44	5th Danish Country Report to the Convention on Biological Diversity. March 2014 Danish Ministry of the Environment Nature Agency https://www.cbd.int/doc/world/dk/dk-nr-05-en.pdf	Overview, HCV 3

Controlled wood category 4: Wood from forests being converted to plantations or non-forest use

Risk assessment

Indicator	Source of information	Functional scale	Risk designation and determination
4.1	<p>Legislation</p> <p>Bekendtgørelse om erstatningsskov (Order for compensation forest): BEK nr 1185 af 07/12/2011; https://www.retsinformation.dk/Forms/R0710.aspx?id=129849</p> <p>Skovloven (Forest Act) LBK nr 678 af 14/06/2013, art. 6, 8, 10, 11, 12, 37, 38 https://www.retsinformation.dk/forms/R0710.aspx?id=143280</p> <p>Other</p> <p>Global Forest Watch http://www.globalforestwatch.org/country/DNK</p> <p>FAO Global Forest Resources Assessment http://www.fao.org/docrep/017/ap862e/ap862e00.pdf</p>	-	<p>Assessment based on legality</p> <p>Content of the law:</p> <p>The Forest Act specifies that a forest reserve must be kept as a forested area, and conversion of a forest reserve can happen only under special circumstances. Conversion can be effected by lifting the forest reserve classification, but under such circumstances a compensation forest should be established within a given timeframe. The establishment of compensation forest is regulated under the Order of Compensation Forest.</p> <p>If the converted area is 0.5 ha or below, no compensation forest is required. In areas close to cities, no compensation forest is required on areas of 0.1 ha or below. If the requirement is found to be manifestly unreasonable, compensation forest shall not be established.</p> <p>The area of compensation forest is calculated based on the converted area. If damage is done on adjacent areas, the area for calculation can be expanded to cover these areas as well.</p> <p>The size of the area can be calculated based on:</p> <p>110% of the calculation area for areas without woodland or without special forest legality potential;</p> <p>150% of the calculation area for areas managed as ordinary forest;</p> <p>200% of the calculation area for forest near cities, and for areas with high forest recreational or biodiversity values including forest edges.</p> <p>For infrastructural projects the compensation area is calculated as 200% of the forest area. The Danish Nature Agency can set up requirements as to the location of the compensation forest, as well as the forest type. Compensation forest can also be established gradually.</p> <p>A security (in the form of a bank guarantee or similar) shall be provided in relation to the establishment of compensation forest; and shall be able to cover the expenses associated with establishing the compensation forest.</p> <p>Compensation forest can also be in the form of forested areas not included in the forest reserve.</p>

Is the law enforced?

Denmark has a high Corruption Perceptions Index (CPI) and a high score on the World Bank Worldwide Governance Indicators. Forest control activities are carried out only if violations in the forest have been reported by stakeholders. Because Denmark is densely populated, there is low risk of illegal conversion not being detected. The legislation and requirement of compensation forest is considered well implemented.

Is it possible to conclude that the spatial threshold (0.02% or 5000 ha) is met?

Legislation exists only for forest reserves, and – for the forested areas in Denmark that are not classified as forest reserves – no approval or requirement of compensation forest is requested.

The conversion of forest reserves is strictly regulated. However, the legislation does not ensure compensation for conversion of forest areas outside the forest reserve.

It is estimated that 28% of the forest area is not classified as forest reserve, and can thus be freely converted.

Thus, the legislation is considered sufficient to ensure that the outcome of the indicator is kept within the forest reserves and the risk for conversion is considered low. However, outside the forest reserves the legislation is not able to prohibit conversion to the outcome of the indicator.

According to the FAO Global Forest Resources Assessment, Denmark has not experienced a negative trend exceeding 0.02% loss in forest cover in recent years.

Furthermore, according to the site Global Forest Watch, in Denmark 4.428 ha, 3.132 ha, 4.452 ha, 2.015 ha and 3.815 ha in the years 2010, 2011, 2012, 2013 and 2014 were deforested, respectively. The annual deforestation rate is 3.568 ha on average (2010 - 2014). Between 2001 and 2012, 32.196 ha of forests were recovered in the country.

With the presented results, it can be concluded that the conversion of natural forests to plantations or non-forest use in the area under assessment is 0,08%. The average net annual loss for the past 5 years it is 3.568 ha, below the threshold set by the standard.

Risk conclusion:
Low Risk

Recommended control measures

N/A

Controlled wood category 5: Wood from forests in which genetically modified trees are planted

Risk assessment

Indicator	Sources of information	Functional scale	Risk designation and determination
5.1	<p>Ministry of Environment and Food (Research with GMO): http://mst.dk/virksomhed-myndighed/genteknologi/forskning-med-gmo/</p> <p>Ministry of Environment and Food (GMO Trial Release): http://mst.dk/virksomhed-myndighed/genteknologi/forsoegsudsætning-med-gmo/register-over-forsoegsudsætninger/godkendte-forsoegsudsætninger-i-danmark/</p> <p>EU Commission webpage; Deliberate Release of GMO in Denmark: http://gmoinfo.jrc.ec.europa.eu/overview/DK.asp</p> <p>EU Register on Authorized GMO: http://ec.europa.eu/food/dyna/gm_register/index_en.cfm</p> <p>http://naturerhverv.dk/tvaergaende/gmo/dyrkning/kontrol/#c38123</p>	-	<p>There is no evidence of commercial use of GMO (tree) species in the area under assessment, and other available information does not challenge a “low risk finding (“Low risk” thresholds (2) and (3) are met.</p> <p>Based on the available information, the risk for this indicator has been assessed as Low.</p>

	GMO Context Question	Answer	Sources of Information (list sources if different types of information, such as reports, laws, regulations, articles, web pages news articles etc.).
1	Is there any legislation covering GMO (trees)?	<p>Act on Environment and Genetic Engineering. LBK nr 840 af 03/07/2015; https://www.retsinformation.dk/forms/r0710.aspx?id=173167</p> <p>Order on approval of production using genetically modified plants and animals. BEK nr 35 af 19/01/2012; https://www.retsinformation.dk/Forms/R0710.aspx?id=138273</p> <p>Order on fee for case management and supervision under the Act on Environment and Genetic Engineering. BEK nr 38 af 19/01/2012; https://www.retsinformation.dk/Forms/R0710.aspx?id=139102</p> <p>EU Directive EU Directive on the deliberate release into the environment of genetically modified organisms and repealing Council Directive 90/220/EEC</p>	
2	Does applicable legislation for the area under assessment include a ban for commercial use of GMO (trees)?	No	
3	Is there evidence of unauthorized use of GM trees?	No	
4	Is there any commercial use of GM trees in the country or region?	No	
5	Are there any trials of GM trees in the country or region?	No	
6	Are licenses required for commercial use of GM trees?	Yes	
7	Are there any licenses issued for GM trees relevant for the area under assessment? (If so, in what regions, for what species and to which entities?)	No	
8	What GM 'species' are used?	N/A	
9	Can it be clearly determined in which MUs the GM trees are used?	N/A	

Recommended control measures

N/A