

FSC National Risk Assessment

For France – Metropolitan area

DEVELOPED ACCORDING TO PROCEDURE FSC-PRO-60-002 V3-0

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Risk designations in finalized risk assessments for France

Indicator	Risk designation (including functional scale when relevant)
Controlled wood category 1: Illegally harvested wood	
1.1	Low risk
1.2	Low risk
1.3	Low risk
1.4	Low risk
1.5	N/A
1.6	Low risk
1.7	Low risk
1.8	N/A
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	N/A
1.17	Low risk
1.18	Low risk
1.19	Low risk
1.20	Low risk
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	Low risk
3.2	Low risk
3.3	Low risk
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

Background information

What do we mean by FSC Controlled Wood?

The FSC mix label makes it possible to trade on the market products that contain not only FSC-certified materials but also material sourced from non-certified forests. These non-certified materials must, however, fulfil certain minimum requirements and are referred to as FSC Controlled Wood. FSC Controlled Wood guarantees a minimum code of behavior whereby 'bad' forestry practices are excluded from products bearing the FSC mix label. The five named unacceptable practices are:

- Illegally harvested wood
- Wood harvested in violation of traditional and human rights
- Wood from forests where high conservation values are threatened by management activities
- Wood from forests being converted to plantations or non-forest use
- Wood from forests in which genetically modified trees are planted

The objective of controlled wood is, therefore, to facilitate the production of FSC mix products while simultaneously securing a minimum code for non-certified product components. The labelling of products (e.g. by means of a separate symbol) is not possible.

Why is the risk assessment necessary?

Enterprises wishing to declare FSC Controlled Wood material for incorporation in FSC mix products must:

- Verify/prove the source of the wood;
- Assess the risk of non-acceptable sources;
- Where risk is identified, evaluate the supply chain and adopt measures to avoid risk.

Up to now, enterprises using non-certified wood could put in place an internal system for risk assessment (enterprise-based risk assessment). With the revision of the FSC Controlled Wood system, however, this will no longer be possible. The FSC is working towards a State-based risk assessment to which enterprises can resort. This risk analysis process is implemented for France with this document. Specifically, it concerns the assessment and evaluation of how to ensure that forest management does not violate, for example, high conservation values or human rights, and that these receive an appropriate degree of recognition in the risk assessment.

The execution of the risk analysis shall in each case involve the support of a working group comprising representatives of the economy, the environment and society. The risk assessment covers an analysis of the individual risk levels for each category and indicator, and the corresponding implications:

- In the event of a finding of 'low risk' for a particular region (State), no further verification is required for controlled wood from this region. Wood from the region can be added as controlled wood for use in the manufacture of FSC mix products.
- In the event of a finding of 'specified risk,' the supply chain must be assessed with respect to this risk and control measures must be implemented.
- In the event of an 'unassessed' risk, the supply chain must be assessed and control measures must be implemented.

Is all that is happening in French forests identified as 'low risk' equivalent to responsible management?

No. Low risk means that the named categories of controlled wood are not threatened, whether across the forest area or systematically, in a particular region as a consequence of forestry practices. Exemplary forest management practiced by forest enterprises is documented by the FSC in the form of an FSC certification. A low risk of violation of the controlled wood requirements means simply that the FSC does not consider possible infringements to be widespread and that an incorporation of the corresponding material in FSC mix products may be accepted without a comprehensive auditing of forest enterprises.

A participatory process

To accelerate the process globally, the FSC has undertaken a centralized national risk assessment for certain 'easier' categories. This task was carried out by experts. Expert results (provided centrally by FSC International) are available for category 1 on illegally harvested wood, category 2 on wood harvested from areas where violations of traditional and human rights occur and category 5 on wood from forests with genetically modified trees. These have been adopted here without alteration. FSC Deutschland has developed the fundamentals for the assessment of category 3 (high conservation values) and category 4 (forest conversion). In this document the assessment is provided for each indicator.

Timeline for the approval of the French FSC risk assessment

Activity	Deadline	Done
Development of the risk assessment – 1 st draft (version 1)	October 2016	x
Revision by the working group	8 November 2016	x
Development of the 2 nd version of the 1 st draft	March 2017	x
Revision and acceptance by the working group	22 March 2017	x
Review and acceptance by FSC International	July 2017	
Public consultation on the 1 st draft (version 2)	September-November 2017	
Meeting of stakeholders (if necessary)		
Analysis and incorporation of feedback from the consultation	November 2017	
Development of the 2 nd draft (final version)	December 2017	
Review of the 2 nd draft by FSC International	February 2018	
Incorporation of suggestions provided during the review by FSC International	March 2018	
Approval of the French risk assessment by FSC International	May 2018	

Working group

The members of the working group possess the required qualifications for experts as mentioned in Annex A in FSC-PRO-60-002a.

Name	Membership chamber	Qualifications	Contact details
Emmanuel Ripout	Economic Chamber	Business Support Manager at International Paper - FM group manager - Extensive knowledge of FM and CW	Emmanuel.Ripout@ipaper.com
François Guiraud	Economic Chamber	Representative from COPACEL (pulp and paper industries syndicate) - Extensive knowledge of CW implementation	francois.guiraud@tembec.com
Ceydric Sedilot-Gasmi	Economic Chamber	Head of Departement (sylviculture and sustainable management) at Société Française CDC	ceydric.sedilotgasmi@forestiere-cdc.fr

Daniel Vallauri	Environmental Chamber	Forest and Forest products program manager at WWF France Extensive knowledge of biodiversity and forest	dvallauri@wwf.fr
Hervé le Bouler	Environmental Chamber	Head of Forest Network at France Nature Environment (federation of local and regional NGOs) - Extensive knowledge of biodiversity and forest management issues	hlbpro2@laposte.net
Sonia Troadec	Social Chamber	Sustainable Development Manager at Fédération Nationale Familles de France	sonia.troadec@familles-de-france.org
Philippe Canal	Social Chamber	Representative from SNUPFEN –Solidaires (forest worker union in state forests)	pcanal.snupfen@orange.fr

The economic chamber has more members than the other, in order to address the vast diversity of stakeholders of this chamber. However, the decisions are taken in consensus, ensuring equality of input and weight in the decision process for all chambers. This WG has worked with this composition during the whole process of NFSS development and experience has shown that it has not influenced the balance of the decision making process.

Evaluation and control measures

The system employed by the FSC requires that control measures be implemented for any category not designated 'low risk.' As in the following all categories were preliminarily deemed to be 'low risk' for France, no control measures have been formulated as yet and the corresponding details have been deleted from this document. In the event of deviating assessment results ('specified risk') for a certain category, a corresponding control measure must then be formulated.

Underlying policy

To allow for comparability of the state-based risk assessment in an international context, the FSC has developed guidelines for the preparation and implementation.

Title	Relevance for risk assessment in France	Reference and version
FSC PROCEDURE: The development and approval of FSC® national risk assessments	Requirements of and methods for a national risk assessment Normative and therefore binding	FSC-PRO-60-002 V3-0 EN
FSC national risk assessment framework	Contains the process steps for the risk assessment Normative and therefore binding for the working group	FSC-PRO-60-002 ^a V1-0 EN
FSC Standard: Requirements for sourcing FSC controlled wood	Describes the requirements of a system of due diligence for certified organizations in the FSC product chain, so as to avoid the use of material from unacceptable sources and to declare material as FSC controlled wood Material from unacceptable sources may not be used for FSC mix products	FSC-STD-40-005 V3-1 EN
Centralized national risk assessment for France	Results of the expert evaluation for France for categories 1, 2 and 5	FSC-CNRA-FRA V1-0 EN

List of abbreviations

Abbreviation	Term
CA	Competent Authority (on EUTR)
CBD	Convention on Biological Diversity
CBPS	Code de Bonnes Pratiques Sylvicoles = Code for Sylvicultural Best Practices
CNRA	Centralised National Risk Assessment
CNPF	Centre National de la Propriété Forestière = National Forest Owners' Centre
CRPF	Centre Régional de la Propriété Forestière = Regional Forest Owners' Centre
CWRA	Controlled Wood Risk Assessment
DOCOB	Document d'Objectif = Management plan for Natura 2000 area
DRAAF	Direction Régionale de l'Alimentation, de l'Agriculture et de la Forêt = Regional Administration for Food, Agriculture and Forest
EUTR	European Union Timber Regulation
FLEGT	Forest Law Enforcement, Governance and Trade
HCV	High Conservation Value = besonderer Schutzwert
HCVRN	High Conservation Value Research Network
IFL	Intact Forest Landscapes
IGN	Institut National de l'Information Géographique et Forestière = National Institute for Geographic and Forest Information
INRA	Institut National de la Recherche Agronomique = National Institute for Agronomic Research
MNHN	Museum National d'Histoire Naturel = National Museum for Natural History
MU	Management Unit
ONF	Office National des Forêts = State Forest Service
PSG	Plan Simple de Gestion = Simple Management Plan
RNEF	Règlement national d'exploitation forestière = The National Forest Management Regulations
RNN	Réserve Naturelle Nationale = National natural reserve
RNR	Réserve Naturelle Régionale = Regional natural reserve
RTG	Règlement Type de Gestion = Standard Management Regulation
ZNIEFF	Zones d'Interêt Ecologique, Faunistique et Floristique = Areas of Ecological, Fauna and Flora Interest
ZPS	Zone de Protection Spécial = Special Protection Area (Natura 2000)
ZSC	Zone Spéciale de Conservation = Special Conservation Area (Natura 2000)

List of experts involved in the risk assessment and their contact details

Name	Organization	Qualifications	Contact details
Emmanuel Ripout	International Paper	Business Support Manager at International Paper - FM group manager - Extensive knowledge of FM and CW implementation	Emmanuel.Ripout@ipaper.com
François Guiraud	COPACEL	Representative from COPACEL (pulp and paper industries syndicate) - Extensive knowledge of CW implementation	francois.guiraud@tembec.com
Ceydric Sedilot-Gasmi	Société Forestière – CDC	Head of Departement (sylviculture and sustainable management) at Société Forestière – CDC	ceydric.sedilotgasmi@forestiere-cdc.fr
Daniel Vallauri	WWF France	Forest and Forest products program manager at WWF France Extensive knowledge of biodiversity and forest management issues	dvallauri@wwf.fr
Hervé le Bouler	FNE	Head of Forest Network at France Nature Environment (federation of local and regional NGOs) - Extensive knowledge of biodiversity and forest management issues	hlbpro2@laposte.net
Sonia Troadec	Fédération Nationale Familles de	Sustainable Development Manager at Fédération Nationale Familles de France (consumer association)	sonia.troadec@familles-de-france.org
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National Risk Assessment maintenance

The responsible body (in accordance with section 2 of FSC-PRO-60-002 V3-0) is: FSC France – 5 rue de Bernus – 56000 Vannes – guillaume.dahringer@fsc-france.fr

The responsible body for maintenance of the NRA will be FSC France. Revisions and/or updates of the NRA will be implemented according to need and at least once every five years. Each updated or revised version will be sent to FSC for approval (with relevant justifications). The revision process will be conducted in accordance with the requirements of FSC-PRO-60-002 V3-0 (or updated version of that document valid at the time of the review).

Complaints and disputes regarding the approved National Risk Assessment

In the event of complaints, stakeholders may contact the responsible body. The responsible body will handle the complaint in accordance with section 12 of FSC-PRO-60-002 V3-0 as follows:

- Acknowledgment of the complaint within two (2) weeks of receipt;
- The responsible body will investigate a complaint that meets the conditions (see below) within six (6) weeks of acknowledging its receipt;
- Conditions under which a complaint shall proceed according to FSC-PRO-01-008 Processing formal complaints in the FSC certification scheme. The complaint must:
 - o contain the name and contact information of the complainant and be signed by the legal representative of the complainant or by the individual in question if the complaint is not filed by an organization; FSC France will consider requests from complainants who wish to remain anonymous to the parties to the complaint and shall protect their privacy and identity to the maximum extent possible, while recognizing that the identity of the complainant might be obvious depending on the circumstances;
 - o be written in French or English; other languages will not be accepted;
 - o list the issues that the complaint addresses in relation to this document – a reference (page, section no., etc.) should be stated – and specify in detail the events that have led to the complaint;
 - o contain evidence to support each element or aspect of the complaint;
 - o indicate whether and in what form the issues have been raised with the defendant prior to lodging the complaint and what response was provided;
 - o contain an agreement to share the complaint with the defendant and other parties to the complaint;
 - o contain an agreement to adhere to the terms and provisions of this procedure.
- The responsible body will keep a complaints register, recording and filing all complaints received, actions taken and results of complaint evaluations;
- After 10 days at the latest, the complainant will receive an initial response with acknowledgment of receipt;
- At the latest 30 days after acknowledgement of the complaint, the responsible body will inform the complainant of the status of the complaint and how quickly a solution is likely to be achieved;
- After 60 days at the latest, the responsible body must provide an answer to all complaints, informing complainants about the actions taken or giving reasons for the rejection of their complaint.
- When the NRA is revised, a summary of the performance of any existing complaint mechanisms shall be included.

List of key stakeholders for consultation

During the planned public consultation, the following stakeholders will be contacted by the means indicated:

Stakeholder Group	Means of communication with members of FSC France	General communication such as Newsletter or website
Economic interests		
Forest owners and/or managers of large, medium and small forests; high-, medium- and low-intensity managed forests	X	X
Forest contractors (including loggers)		X
Representatives of forest workers and forest industries	X	X
Certificate holders	X	X
Social interests		
NGOs involved or with an interest in social aspects of forest management and other related operations	X	X
Forest workers	X	X
International, national and local trade/labour unions	X	X
Representatives of local communities involved or with an interest in forest management, including those relevant for HCVs 5 and 6		X
Representatives of indigenous peoples and/or traditional peoples (if present and/or holding rights), including those relevant for HCVs 5 and 6;	N/A	N/A
Representatives of recreational interests		X
Environmental interests		
NGOs involved or with an interest in the environmental aspects of forest management. Consultation should target the following areas of interest and expertise: Biological diversity, Water and soil, Environmentally related High Conservation Values	X	X
FSC-accredited certification bodies active in the country	X	X
National and state forest agencies	X	X
Experts with expertise in Controlled Wood categories		X
Research institutions and universities		X
FSC Regional Offices, FSC Network Partners, registered Standard Development Groups and NRA Working Groups in the region	Will be contacted through FSC internal mailing list.	

Risk assessments

Introduction

A general analysis for Metropolitan France, serving for all the different categories, has been prepared from a number of international indices. This analysis is set out in the table below.

Sources of information	Evidence
Context (the following are indicators that help to contextualize the information from other sources)	
<i>Data search covering: 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.</i>	
World Bank : publishes aggregate and individual governance indicators for 215 economies (over the period 1996-2015), for six dimensions of governance: Voice and Accountability; Political Stability and Absence of Violence; Government Effectiveness; Regulatory Quality; Rule of Law; Control of Corruption	The indicators for France give the following scores: governance on a scale of - 2,5 to + 2,5 (ranking on a scale of 0 to 100): - Voice and Accountability: 1.20 (88) in 2010; 1.18 (86) in 2015 - Political Stability and Absence of Violence/Terrorism: 0.67 (69) in 2010; 0.27 (57) in 2015 - Government Effectiveness: 1.45 (89) in 2010; 1.44 (89) in 2015 - Regulatory Quality: 1.31 (86) in 2010; 1.15 (83) in 2015 - Rule of Law: 1.51 (90) in 2010; 1.41 (88) in 2015 - Control of Corruption: 1.44 (89) in 2010; 1.28 (88) in 2015
Transparency International : This NGO publishes the Corruption Perceptions Index .	France was ranked 23rd out of 176 countries in 2016, the 1 st -ranking country being the least corrupt. Its score has not changed since 2012.
World Bank Harmonized List of Fragile Situations	France does not feature in this list.
Committee to Protect Journalists : Impunity Index	No journalist or media professional has been killed in France since 1992.
Carleton University : Country Indicators for Foreign Policy. The University's Failed and Fragile States Project examines state fragility using a combination of structural data and current event monitoring.	France scores <i>Med-Low</i> on the 2011 State Fragility Map .
Human Rights Watch	A few minor negative or alarmist items in the chapter of the 2014 Global Report devoted to France. Most were concerned with migrants, asylum application procedures or Roma. None of these items had any particular connection with forests or forestry.
US AID	No results found after searching "France" + "human rights" "conflicts" "conflict timber"
Global Witness	No results found after searching "France" + "human rights" "conflicts" "conflict timber"
WWF Report: Failing the Forests; Europe's illegal timber trade	France is not a source of illegal timber.

WWF website page devoted to illegal timber	France is not a source of illegal timber.
Chatham House Illegal Logging Indicators Country Report Card : Indicator of illegal logging - Data by country	No information on France as a source of illegal timber.
Amnesty International Annual Report : The state of human rights around the world. Information on key human rights issues, in particular freedom of speech, international justice, corporate accountability, the death penalty and reproductive rights	In the Report on France (2013), no information relevant to this risk assessment found.
Freedom House	In the Report on France (2014), the status of the country is given as “free”.
Reporters without Borders : Press Freedom Index	In 2013 (report), France was ranked 37 th out of 179 countries on the World Press Freedom Index.
Fund for Peace : The Fund for Peace is a US-based non-profit research and educational organization that works to prevent violent conflict and promote security. It publishes the Fragile State Index , an annual ranking, first published in 2005, of 177 countries based on their levels of stability and capacity.	France is ranked 158 th out of 178 countries on the 2016 Index (no. 1 being the most failed state). This places France in the highest sub-category of “stable” states.
Global Peace Index : Published by the Institute for Economics & Peace, this index is the world’s most all-embracing measure of national peacefulness. It ranks 132 countries according to their absence of violence. It is made up of 23 indicators, ranging from a nation’s level of military expenditure to its relations with neighbouring countries and level of respect for human rights.	France ranks 46 th out of 162 countries on the 2016 index . It is in the second highest category where peacefulness is concerned.
Google search for “France” and one or more of the following terms: “timber”, “conflict”, “illegal logging”	No additional relevant information found.
Information from FSC France / French CW Working Group: information on illegal logging	All information provided is in line with the above.

Conclusion on the situation in France:

France has positive results for all the indicators examined under this heading. It gets relatively high scores for all the factors relating to stability: good governance, absence of significant conflict. France is also regarded as a country all of whose citizens live in freedom, with a good legal system.

To avoid excessive duplication in the following tables, some information is provided here and the reader will subsequently be referred back to this introduction.

Applicable laws and regulations

Legal management procedures:

- Public forests: [Forest Code](#) L212-1 to L212-3, L213-5, L214-5, L122-5 and L212-4.
- Private forests having a management document (*Plan Simple de Gestion / PSG*) or *Règlement Type de Gestion / RTG*): Forest Code L312-1 to L312-12 and L313-1 à L313-2.
 - [Order of 19 July](#) determining mandatory information to be included in private forests management plans (PSG) and annexes, most recently amended 28/07/12
 - [Decree no. 2011-587](#) relating to the conditions for drawing up PSGs, most recently amended 25/05/11
 - [Circular DPAAT/SDFB/C2010-3100 of 16/11/10](#), relating to simplification of the investigatory and supervisory procedures for approving PSGs
- Private forests without a management document: Special Administrative Authorization, as specified in L312-9 to L312-10 and R312-20 of the Forest Code.

Management techniques and recommendations in public forests:

The National Forest Management Regulations (*Règlement national d'exploitation forestière / RNEF*) is a binding internal document for all national forests, implemented by contract, but not binding from the point of view of official legislation.

- [Règlement national d'exploitation forestière](#) (RNEF)

Management techniques and recommendations in private forests:

Harvesting and forestry techniques feature in the management documents and/or are set out in the contract with those invited to manage the forests. Please note that the information relating to management and forestry techniques is also available in the Regional Forest Management Schemes (*Schémas régionaux de gestion sylvicole*) drawn up by Regional Forest Owners' Centres (*Centres régionaux de la propriété forestière*).

- [Website of the Fédération nationale Entrepreneurs des territoires](#)
- [Regional directives for private forests](#)

Legal authorities in France

Competent authority for State-owned forests: [Office National des Forêts](#)

Competent authorities for private forests: [site de la forêt privée française](#)

- National public organization - Regional Forest Owners' Centres (*Centres Régionaux de la Propriété Forestière / CRPF*), in coordination with the National Forest Owners' Centre (*Centre National de la Propriété Forestière / CNPF*). The regional centres are responsible for providing regional directives for the management of private forests and approving the management documents relating to them. They also run training programmes for forest owners.

- Forest owners may ask a Professional Forest Manager (*Gestionnaire Forestier Professionnel*) or forestry cooperative to assist them in their forest management activities (drafting management documents, day-to-day management, harvesting operations and the sale of forest products). The forestry cooperatives representative body is the *Union de la Coopération Forestière Française*. The body representing forestry experts is the *Conseil National de l'Expertise Foncière Agricole et Forestière*.

Competent authority for implementing national forestry policy:

The [Ministry of Agriculture and Forests](#) exercises authority over forestry policy and lays down rules for forest management and logging. The Ministry works in conjunction with the *Direction Régionale de l'Alimentation, de l'Agriculture et de la Forêt*.

Sources of general information

[Forest Code](#)

Controlled wood category 1: Illegally harvested wood

Overview

Sources of legal timber in France

Forest classification type	Permit/license type	Main license requirements (forest management plan, harvest plan or similar?)	Clarification
Public forests		Management document	Harvest permits/licenses are not issued separately and a forest owner in possession of valid forest management documents or a Special Administrative Authorization may harvest according to the management plan/authorization.
Private forests		Forest > 25 ha: Management document called "PSG" Forest < 25 ha: lighter non-mandatory management documents (RTG or CBPS)	Harvest permits/licenses are not issued separately and a forest owner in possession of valid forest management documents or a Special Administrative Authorization may harvest according to the management plan/authorization.
Private forest <25ha without a management document		Special Administrative Authorization	Specific authorization to harvest is required. When a forest owner applies for a Special Administrative Authorization, the Regional Forest Owners' Centre will provide an opinion on the application to the Ministry of Agriculture and Forestry and/or Ministry of Environment. The relevant Ministry then makes a final decision based on this opinion and on the forest owner's original application
Forest with protected areas or species		Management documents as stated in introduction	Harvesting operations may occur in protected areas under certain conditions, depending on the protection status and on the areas. For instance, there are no general rules regarding harvesting operations in Natura 2000 areas. When drafting the forest management document, the manager shall refer to the Natura 2000 area management document. Forest operations may also occur in reserves. The decree creating the reserve defines the rules governing that reserve. For instance, it may be stated that under some conditions forests operations planned for in the forest management documents are allowed but that clear cuts are forbidden. Regional Natural Parks do not prohibit harvesting, either, but some rules may be applied, for instance to preserve the landscape. In summary, the forest management documents must take into account the different protected areas within the forest area and

			ensure compliance with the specific requirements of protected areas. The management plan, including harvesting plan, and its compliance with the specific protected area rules are then approved by the administration concerned.
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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"> • <u>Laws/regulations applicable to the legal framework regarding droits réels (real rights):</u> <ul style="list-style-type: none"> - Forests are legally considered as bien immeubles (immovable goods), to which droits réels (real rights) are applicable: Civil Classification of Goods (Art. 516 to 543 of the Civil Code) - Private ownership: Civil Code (prerogative attributes of property rights Art. 537, 543, 544; private property /land tenure rights Art. 544 to 577; usufruct Art. 625 to 636; use Art. 625 to 636; legal modalities to become a private owner, Book 3); - Regarding the ownership by public organizations (including the State): Public Entities Ownership Code: L2212-1, part 2 books 2 and 3, part 3 book 2; acquisition: part 1 books 1 and 2. • <u>Laws/regulations applicable to public access to the Land Registry:</u> <ul style="list-style-type: none"> - Decree no. 2012-59 of 18th January 2012, related to public access to Land Registry information. - Article L107 A of the Fiscal Procedures books. • <u>Laws/regulations applicable to management rights and obtaining of management rights:</u> <p>Article L122-3 of the Forest Code, describing the list of valid forest management documents, depending on the forest type.</p> • <u>Laws/regulations applicable to management documents considered as sustainable management guarantees:</u> 	<ul style="list-style-type: none"> Forest Code World Bank Transparency International Land Registry National mapping data, including Land Registry Information on public access to the Land Registry Concerning the history of the Land Registry in France 	<p style="text-align: center;">Low risk</p> <p>In France the land registry was established during the 19th century for the whole country. It has been modernized and reviewed since then. As a result, the boundaries of forests (both public and private) are usually well known, visible in the land register and on the ground (demarcated by boundary markers).</p> <p>In addition, this information has become very accessible as it is now available on the internet. A specific mapping website called Geoportail makes it possible to check the land registry map and maps showing the spatial extent of forests, in conjunction with aerial photos of the forest.</p> <p>For private forests, the owners are given an official document (land title) when buying or inheriting a piece of land, on which the limits of the property are clearly specified, using land registry references. State forests are defined as being part of the property of the State. Their ownership has been clearly established in the past through an <i>acte de classement</i> (classifying act). Their limits and ownership are also well established and documented through the land registry.</p> <p>Given France's World Bank Governance Index and Transparency International Corruption Perceptions Index scores (see introduction), the risk regarding land rights can be considered low.</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>- Forest Code L124-1 to L124-6</p> <p>• <u>Laws/regulations applicable to obligations to clearly define the limits of the forest in management documents:</u></p> <p>- <i>Plan Simple de Gestion (PSG)</i> (Simple Management Plan) Order of 19th July 2012, defining mandatory information to be included in private forests management plans (Plan Simple de Gestion) and annexes.</p> <p>Legal Authority</p> <p><i>For general information: see introduction</i></p> <p><u>Competent authority for land registry:</u> Town Council and fiscal administration.</p> <p><u>Competent authority in cases where there is a dispute or conflict regarding boundaries or ownership:</u> judicial or administrative tribunals (<i>tribunaux judiciaires</i> or <i>tribunaux administratifs</i>) depending on the type of dispute.</p> <p>Legally required documents or records</p> <p>Land title for private forests and management plan for State forests. Extracts from the Land Registry.</p>		
1.2 Concession licenses	<p>Applicable laws and regulations</p> <p>• Laws/regulations applicable to public forests which are managed by a person other than the owner:</p> <p>- Law No. 2001-1168 of 11 December 2001 on urgent measures for economic and financial reforms (MURCEF law), in particular Article 3 defining the public service delegation)</p> <p>- Law no. 85-704 of 12th July 1985 on public project management and its relationship with private project management)</p> <p>• Laws/regulations applicable to the delegation of management of private forests to third parties:</p>	<p>Forest Code</p> <p>Concession of works, public land occupation, public services and leases, updated on 28 June 2014</p> <p>Website providing information on public procurement contracts</p>	<p style="text-align: center;">Low risk</p> <p>There exist legal provisions for appointed third-parties to manage both private and public forests. Third-party management is permissible on condition that specific rules are followed.</p> <p>There exists no long-term concession system - similar to that which can be seen in some tropical contexts - in mainland France (overseas colonies are excluded from this analysis).</p> <p>The lease of management rights in French forests is generally confined to specific activities and limited time periods. In such cases, the lease is agreed through a legally-binding contract and/or, where relevant and necessary, according to public procurement procedures regarding public forests.</p> <p>Given the fact that;</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>On the basis of prerogatives relating to ownership within the meaning of Articles 537, 543 and 544 of the Civil Code, related respectively to the prerogative of disposition, enjoyment, and use of the property.</p> <p>Depending on the ownership: Forest Code Group of owners: L331-1 to L331-7; Management by professionals: L315-1; Management contract regarding National State forest services: L315-2.</p> <p>Specifically regarding State forests being part of the private domain of the State: Public Entities Ownership Code, Part 4.</p> <p>About the different forms of associations allowed to delegate the management: Forest code L231-1 to L231-6; L232-1 to L232-3; L233-1 to L233-10; L332-1 to L332-4; L332-5; L332-6.</p> <p>• Laws/regulations applicable to public procurement:</p> <ul style="list-style-type: none"> - All travaux (works) directives. - Law of 3rd January 1991 related to transparency and regulation of markets. Plus related decrees of 18th September 1990 and no. 92-311 of 31st March 1992. - Public Procurement Code. - Law of 29th January 1993 related to corruption prevention and transparency in economic and public procedures. <p>• Laws/regulations applicable to public/private partnership:</p> <p>Order no. 2004-559 of 17th June 2004 concerning partnership contracts.</p> <p>Legal Authority</p> <p><u>For general information: see introduction</u></p> <p>Legally required documents or records</p>		<p>(i) long-term concessions are uncommon,</p> <p>(ii) the scope of management leases is usually limited and</p> <p>(iii) concession rules are clearly established,</p> <p>the risk can be defined as low for this indicator.</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	Contracts, public procurement procedures, terms of references and specifications.		
1.3 Management and harvesting planning	<p>Applicable laws and regulations <i>For general information: see introduction</i></p> <ul style="list-style-type: none"> • Laws/regulations applicable to the introduction of the <i>Chartes Forestières de Territoire</i> (Charters of Forest Territory): <ul style="list-style-type: none"> - Law 2001-609 of 9th July 2001 • Laws/regulations applicable to mandatory approval by the competent authorities: <ul style="list-style-type: none"> - Law no. 2010-874 of 27th July 2010, regarding modernization of agriculture and fisheries. - Circular DGPAAT/SDFB/C2010-3111 of 15th December 2010, regarding development and implementation of regional multiannual forest development plans. - Circular DGPAAT/SDFB/C2010-3079 of 9th August 2010, regarding local strategies for forest development. - Circular DPAAT/SDFB/C2010-3100 of 16th November 2010, regarding simplification of the administrative procedure for approval and monitoring of the management plan (<i>Plan Simple de Gestion</i>) for private forests. - Law no. 2012-357 of 22nd March 2013, related to simplification of administrative processes. - Decree no. 2011-587 related to the need to elaborate a management plan (<i>Plan Simple de Gestion</i>) - Decree no. 2012-616 of 2nd May 2012, regarding the assessment of different plans and documents affecting the environment. - Decree no. 2013-194 of 5th March 2013, regarding protection of the environment and rural areas. 	Forest Code	<p style="text-align: center;">Low risk</p> <p>In France there is an obligation for all public forests to have a management document.</p> <p>There is also an obligation for all private forests larger than 25ha to have a management plan.</p> <p>Private forests smaller than 25ha can have a management plan (although it is not mandatory) or less rigorous management documents; either <i>Règlement Type de Gestion</i> (Standard management rules) or a <i>Code de Bonnes Pratiques Sylvicoles</i> (Code of Silvicultural Best Practice).</p> <p>In cases where there are no management documents at all, harvesting operations require a Special Administrative Authorization from the administration.</p> <p>The scope and content of applicable management documents is clearly stated in the Forest Code (2004), along with rules for specific authorization to harvest.</p> <p>In addition, regional forest management guidelines are elaborated for both private and public forest land.</p> <p>Approval from the administration is always required for all management documents. There are specific approval procedures for all these documents, clearly stated in the Forest Code (2004). The Forest Code also specifies the sanctions to be applied in case of non-compliance with the legal requirements.</p> <p>The relevant Administrations have enforcement competencies over forestry matters. Given France's World Bank Governance Index and Transparency International Corruption Perceptions Index scores (see introduction), the risk for this indicator may be regarded as low.</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><i><u>For general information: see introduction</u></i></p> <p>Legally required documents or records</p> <p>Management documents and official approval of the management documents. In cases where there are no management documents, a record of Special Administrative Authorization for any harvesting operations is required.</p>		
1.4 Harvesting permits	<p>Applicable laws and regulations</p> <p>Laws/regulations applicable to mandatory approval by the competent authorities:</p> <ul style="list-style-type: none"> - Law no. 2010-874 of 27th July 2010, regarding modernization of agriculture and fisheries. - Circular DGPAAT/SDFB/C2010-3111 of 15th December 2010, regarding development and implementation of regional multiannual forest development plans. - Law no. 2012-357 of 22nd March 2013, related to simplification of administrative processes. - Decree no. 2011-587 related to the need to elaborate a management plan (<i>Plan Simple de Gestion</i>) - Decree no. 2012-616 of 2nd May 2012, regarding the assessment of different plans and documents affecting the environment. - Decree no. 2013-194 of 5th March 2013, regarding protection of the environment and rural areas. - Technical instruction - DGPE/SDFCB/2017-69, 23/01/2017 <p>Legal Authority</p> <p><i><u>For general information: see introduction</u></i></p> <p>Legally required documents or records</p>	<p>Forest Code</p> <p>World Bank</p> <p>Transparency International</p> <p>Technical Instruction DGPE / SDFCB / 2017-69 of 23/01/2017 on the procedures for processing applications for authorization to harvest forests without sustainable management documents, as provided for in Articles L.124-5 and L. 312-9 of the Forest Code and 2-2 of Article 793 of the General Tax Code</p>	<p style="text-align: center;">Low risk</p> <p>Harvest permits/licenses are not issued separately and a forest owner in possession of valid forest management documents or a Special Administrative Authorization may harvest according to the management plan/authorization.</p> <p>The management documents, approved by the administration, include information on the quantities and species allowed to be harvested, as well as the spatial and temporal boundaries.</p> <p>Harvesting must be conducted in line with the management document, however harvesting may occur 5 years prior to, or later than, the dates specified therein.</p> <p>The relevant Administrations have enforcement competencies over forestry matters.</p> <p>There are cases in France where municipality forests do not have the management plan or the right type of management plan according to the law: cuts in these forests are therefore regarded as illegal. These forests represent an estimate of 300 000ha area (1.7% of the total metropolitan forest area) scattered among small size municipalities. Not all of them are effectively conducting management operations and harvests in their forests, however they need a management plan nonetheless. To address the issue, the Ministry of Agriculture, together with the State Forest Service (ONF) defined in 2016 an action plan to develop adequate management plans for these municipalities (Technical instruction DGPE/SDFCB/2016-656, 19/07/2016). The States Forest Services is missioned to establish a diagnostic per Department, including a prioritized workplan, of the areas concerned, and send this diagnostic to the departmental administration (prefect) for decision. The progress of this action plan is monitored by the Ministry of</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	Management documents and official approval of the management documents. In cases where there are no management documents, a record of Special Administrative Authorization for any harvesting operations is required.		<p>Agriculture. Additionally, the Ministry of Agriculture published another Technical instruction (DGPE/SDFCB/2017-69, 23/01/2017) describing in detail under which conditions harvest can be carried out in these forests while the adequate management plans are being developed. This instruction also lists the penalties in case those conditions are not respected – up to 20 000€/ha for the first two hectares and 60 000€/ha for the following hectares. This technical instruction was communicated through a letter sent by the Minister to the National Federation of Municipality Forests (FNCOFOR) and more widely to all stakeholders of the forest and industry sector.</p> <p>Given France's World Bank Governance Index and Transparency International Corruption Perceptions Index scores (see introduction), the risk for this indicator may be regarded as low.</p>
Taxes and fees			
1.5 Payment of royalties and harvesting fees	<p>Applicable laws and regulations N/A. Taxes are not paid through a royalty system or volume-based system (see below and column I for more details).</p> <p>Legal Authority N/A</p> <p>Legally required documents or records N/A</p>	<p>Forest Code</p> <p>Official website of the Public Revenue Office</p> <p>Other sources: http://www.ofme.org/crpf/documents/fiches/643401.pdf http://www.crpf-midi-pyrenees.com/echoforets/dossier49.pdf</p>	<p style="text-align: center;">N/A</p> <p>There are no royalties, stumpage fees or other volume-based fees. The fees that forest owners have to pay annually do not depend on the volume of wood sold. An annual cadastral income is instead declared - this is the annual indexed value of the forest land. The cadastral income is declared even when no wood has been sold.</p> <p>As a result, this indicator is not applicable for France.</p>
1.6 Value added taxes and other sales taxes	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> • Laws/regulations applicable to inheritance/sales taxes: <ul style="list-style-type: none"> - Inheritance: General Tax Code (Part 1, Title 4, Ch.1, Section 2, VI, Art. 777) - Sale of property or forest groups: General Tax Code (Part 1, Title 4, Ch.1, Section 2, II, Art. 682-717 and Art. 150U. • Laws/regulations applicable to VAT: General Tax Code (Part 1, Title 2, Ch.1, Art. 293B) <p>Legal Authority</p>	<p>Dullin A. 2016. Tax avoidance mechanisms, their impact on tax consent and social cohesion, Economic and Social Council And Environmental, 134 pages.</p>	<p style="text-align: center;">Low risk</p> <p>Regarding VAT, it is possible that wood could be sold without being invoiced but this risk is low.</p> <p>Sale of timber without VAT payment is mainly a risk for sales of materials for private consumption, not wood going into the supply chain (non-commercial volumes). For other taxes, it would be unrealistic to say that there is no risk of fiscal fraud, but controls exist which ensures that the risk is relatively low.</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	Public Revenue Office Legally required documents or records Tax declaration and receipt.		
1.7 Income and profit taxes	Applicable laws and regulations <ul style="list-style-type: none"> • Laws/regulations applicable to Income and Profit taxes: General Tax Code - Income tax: Part 1, Title 1, Ch.1 Art.206 - Corporate tax: Part 1, Title 1, Ch. 2, Art. 197 Legal Authority Public Revenue Office Legally required documents or records Tax declaration and payment receipts.	Dullin A. 2016. Tax avoidance mechanisms, their impact on tax consent and social cohesion, Economic and Social Council And Environmental, 134 pages.	<p style="text-align: center;">Low risk</p> As for VAT, it is possible that the wood is sold without invoicing, but the risk is low. The sale of timber without payment of VAT is a risk that concerns mainly private consumption, not wood intended for the supply chain (low volumes). Tax evasion in France is estimated at € 80 billion per year. The rate of tax avoidance is broadly proportional to the size of firms. Since forestry is mainly a small business, tax fraud remains limited in the wood sector. In addition, there are controls at the national level, so the risk of tax evasion can be considered low.
Timber harvesting activities			
1.8 Timber harvesting regulations	Applicable laws and regulations No formal legislation regulating forest management exists. However, a series of regional guidelines for silvicultural techniques and timber harvesting apply when preparing management plans (Forest Code , Art. L122-2). Legal Authority <i>For general information: see introduction</i> Legally required documents or records Not legally required. But contracts, public procurement procedures, terms of reference and specifications, and regional guidelines, can show if guidelines are followed.	Forest Code	<p style="text-align: center;">N/A</p> The Forest Code does not define any technical requirement regarding harvesting or silvicultural techniques. Guidance is provided in the regional guidelines written by the Regional Commission for Forest and Wood composed of regional public and private stakeholders and approved by the Ministry in charge of forest issues. Forest contractors work with contracts in which the technical specifications are stipulated and enforced. For public forests, these technical specifications are set out in the National Forest Operations Regulations. They are drawn up and enforced by the National State Forest Service. For private forests, some specifications derive from regional guidelines and management plans and are enforced by the forest owner. These guidelines are generally adhered to by forest owners, but are not legally binding. Compliance is ensured through a process of internal validation for public forests (Forest Code, Art. L212-2)

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
			<p>and validation by the Centre Régional de la Propriété Forestière (Regional Center for Forest Ownership) for private forests larger than 25ha (Forest Code, Art. R312-6).</p> <p>Even though there are guidelines that are consistently followed, there are no direct legally-binding instruments governing harvesting or silvicultural techniques.</p> <p>The risk for this indicator is considered to be not applicable.</p>
1.9 Protected sites and species	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> • International laws/regulations: <ul style="list-style-type: none"> - Convention on Biological Diversity (1992) - UN Framework Convention on Climate Change (UNFCCC) (1992) - Ramsar Convention on Wetlands (1971) - UNESCO Convention concerning the Protection of the World Cultural and Natural Heritage (1972) • Regional laws/regulations: <ul style="list-style-type: none"> - Helsinki Criteria (1993) and Vienna Criteria (2002) - Convention on the Conservation of European Wildlife and Natural Habitats (1979) - Birds Directive (1979) - Habitats Directive (1992) - Regulation (EC) No. 401/2009 of the European Parliament and of the Council (2009) • National laws/regulations: <ul style="list-style-type: none"> - Order of 27th May 2009, defining the list of threatened vertebrate species whose living area goes beyond a department territory in France. - Decree no. 2011-966 of 16th August 2011, related to the system of administrative authorization specific to Natura 2000. - Decree no. 2010-365 of 9th April 2004/2010 related to Natura 2000 incidence assessment. 	<p>Forest Code</p> <p>Protected areas</p> <p>Protected areas in France, according to the IUCN : National Inventory of National Heritage (Inventaire National du Patrimoine Naturel), maintained by the National Natural History Museum</p>	<p style="text-align: center;">Low risk</p> <p>Around 20% of the country is classified as protected area, with a wide range of statuses. The status and associated rules and sanctions are described in the Environment Code. Protection of forest is described in the Forest Code.</p> <p>Recognition of the presence of protected areas and/or protected species within an area of forest is a key requirement in management documents.</p> <p>Violations do occasionally occur, but the relevant administration staff have competence to ensure that regulations concerning protected areas and species are generally respected. The risk of violations, regarding protected species and protected areas, can be considered low.</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>- Protocol of application of the Alpine Convention regarding nature protection and landscape maintenance (1991)</p> <p>- Environment Code: L411-1 and L411-2</p> <p>• Specific regulations regarding protected areas:</p> <p>- Environment Code, Book 3 (Natural areas).</p> <p>- Decree no. 2009-377 of 3rd April 2009 regarding National Parks.</p> <p>• Specific regulations regarding protective functions of forests:</p> <p>Forest Code, Book 4, L411-1, (system to classify forests with protective functions).</p> <p>Legal Authority</p> <p><i>For general information: see introduction</i></p> <p>Competent authority for implementation of the national environmental policy:</p> <p>The Ministry of the Environment and <i>Directions Régionales de l'Environnement, de l'Aménagement et du Logement (DREAL)</i> (Regional Directorate for Environment, Land-Use Planning and Housing)</p> <p>Legally required documents or records</p> <p>Charter or management contract for Natura 2000, management documents, list of endangered and protected species, maps of protected areas.</p>		
1.10 Environmental requirements	<p>Applicable laws and regulations</p> <p><i>For general information: see introduction</i></p> <p>• Laws/regulations applicable to impact studies and impact assessments:</p> <p>- Environment Code, L122-1 to L122-12.</p> <p>- Decree no. 2011-2018 of 29/12/2011, regarding reforming public enquiries and consultations related to operations having a potential impact on the environment.</p>	<p><i>Impacts of forest management</i></p> <p>Observatory of the impacts of forest management in France (2006)</p>	<p style="text-align: center;">Low risk</p> <p>The environmental impact of harvesting, for example on soil or watercourses, is well covered by French legislation and additional guidance documents.</p> <p>Specific requirements are regularly included in the technical specifications of forest contractors' contracts.</p> <p>Laws state which practices are allowed and which are prohibited, but do not state any impact threshold, as this would be too difficult to monitor properly. In 2006, a private research organization, the Cellulose and Forest Association, produced a study on 48 forest</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>- Decree no. 2011-2019 of 29/11/2011, regarding reforming impact assessments for works projects.</p> <p>- Order no. 2012-34 of 11/01/2012 simplifying, reforming and harmonizing the provisions of the administrative and legal policies of the Environment Code</p> <p>• Laws/regulations applicable to prevention and mitigation of environmental damages:</p> <p>- Environment Code, L160-1 to 165-2</p> <p>- Decree no. 2009-468 of 23/04/2009, regarding prevention and mitigation of certain forms of damage to the environment.</p> <p>• Laws/regulations applicable to the environmental and social assessment as a part of forest management documents:</p> <p>- Public forests: Forest code L212-1 to L212-3, L213-5, L214-5, L122-5 and L212-4.</p> <p>- Private forests having a management document: Forest code L312-1 to L312-12, L313-1 to L313-2 and L313-3.</p> <p>• Laws/regulations applicable to water and watercourses:</p> <p>Environment Code, Art. L.214-3, L. 215-9, L. 215-14 and L. 432-2.</p> <p>Water Law no. 92-3 of 03/01/1992</p> <p>Decree no. 93-743 of 29/01/1993</p> <p>Circular DE / SDAGF / BDE no. 3 of 02/03/2005</p> <p>• Other :</p> <p>- Order of 20/05/2009, defining the limit for compensation in case of damage caused by species of game not subject to a hunting plan.</p> <p>Legal Authority</p> <p><i>For general information: see introduction</i></p> <p>Competent authorities for implementation of the national environmental policy:</p>		<p>harvesting operations to assess the level of environmental impact. The result of this study was that only 2 of the 48 harvesting operations produced negative impacts (i.e. percentage of trees damaged >20; rutting >10%; areas where forest vehicles had been driven during forest operations >40%). Negatively impacted sites constituted 4% of the total sites visited.</p> <p>Although such damages could still occur during harvesting operations in France, monitoring is conducted and, given the country's World Bank Governance Index and Transparency International Corruption Perceptions Index scores (see introduction), non-compliance with the environmental requirements set out in the legislation are not considered an issue; the risk can be considered low for this indicator.</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>Ministry for the Environment and <i>Directions Régionales de l'Environnement, de l'Aménagement et du Logement (DREAL)</i> (Regional Directorate for Environment, Land-use Planning and Housing).</p> <p>Competent authorities for watercourses: Direction Départementale des Territoires (DDT) (Departmental Directorate of Territories).</p> <p>Legally required documents or records</p> <p>Documented protection and/or mitigation measures. Technical specifications for forest harvesting, (e.g. in agreements with forestry contractors). National or regional guidelines. In some cases, impact studies may also be required.</p> <p>For public forests, the strategies used to protect streams should be clearly stated in a section of the management plan known as the <i>plan d'exploitabilité orienté Eau</i> (operational plan focused on water).</p>		
1.11 Health and safety	<p>Applicable laws and regulations</p> <p>• Laws/regulations applicable to health and safety on forest operations:</p> <ul style="list-style-type: none"> - Labour Code: Part 4 covers health and safety at work. Part 4 book VII covers health and safety inspections. Title II, section 1 covers the <i>document unique d'évaluation des risques (DUER)</i> (risk assessment documentation) Art. R4121-1 to R4121-4. Part 8 covers inspections and the competent administration for performing inspections: L8112-1 to L8123-6 for the labour inspectorate (supervisory administration) - Order of 31/03/2011 relating to the work sheet ("fiche de chantier") required by Article R.717-78-1 of the Rural Code - Decree no. 2010-1603 of 17/12/2010 relating to health and safety rules during forestry operations - Internal memo DGPAAT/SDFB/N2012-3019 of 9/05/2012 concerning the implementation of the 	<p>Forest Code</p> <p>Labour law</p> <p>Labour Inspectorate reports 2012 report of the Labour Inspectorate and annexes</p>	<p style="text-align: center;">Low risk</p> <p>French legislation requires that every person engaged in forest operations have training or experience that is relevant to the tasks being performed, have personal protective equipment appropriate to the risks inherent in the tasks being performed and is informed that it is mandatory to wear the protective equipment.</p> <p>All mandatory safety devices must be in place for work with machines and vehicles; they must be regularly maintained in accordance with the manufacturer's instructions. Safety perimeters must be designated and enforced.</p> <p>In addition, some controls are implemented by the Labour Inspectorate, which produces comprehensive annual reports (see website address in column H). The last edited report (2012) does not show any alarming figures regarding infringements of laws in the forest sector compared to other sectors. The report clearly specifies on p.536 that the forest sector was prioritized in the 2010-2014 "health and safety at work" plan, together with the construction sector and the agricultural sector. This shows that the health and safety risks inherent in forest operations are being addressed by the competent authority. The 2012 report reports</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>regulations related to health and safety during forestry operations.</p> <ul style="list-style-type: none"> • Laws/regulations applicable to the use of chemicals: <ul style="list-style-type: none"> - Environment code, L511-1 to 523-8; - Rural Code, L 251-1 to 258-2; - National Forest Operations Regulations (RNEF): chapter 2.3 <p>Legal Authority Labour Inspectorate</p> <p>Legally required documents or records Equipment, DUER (<i>document unique d'évaluation des risques</i>), authorizations related to the use of certain chemicals and reports from the controlling administration (Labour Inspectorate).</p>		<p>zero infringements regarding health and security for the forest sector.</p> <p>As a result, the risk can be considered as low for this indicator.</p>
1.12 Legal employment	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> • All the aspects of the criterion are covered by the Labour Code: concerning discrimination, Part 1, title III arts. L1131-1 to L1134-5; concerning employment contracts, Book 2; concerning workers' organizations and freedom of association, Part 2; concerning working time requirements, wages and other financial benefits, Part 3; concerning the minimum working age and types of work allowed for specific categories of workers (young workers, pregnant women for instance), Part 4; concerning professional training, Part 6; concerning inspections and the competent administration for performing these inspections, Part 8; concerning the labour inspectorate (supervisory administration), L8112-1 to L8123-6; concerning illegal working, L8211-1 to 8272-4. • additional texts regarding the presumption of salaried status of people contracted for forest operations : <ul style="list-style-type: none"> - Decree n°2009-99 of 28/01/2009 		<p style="text-align: center;">Low risk</p> <p>The Labour Code in France is comprehensive and includes the implementation of controls by a dedicated administration called the Labour Inspectorate.</p> <p>Fraud in respect of URSSAF and social insurance does exist, but at a relatively low level.</p> <p>Intensive controls are carried out by the Labour Inspectorate, with a focus on the construction sector and the agricultural sector, which includes the forest sector.</p> <p>The Labour Inspectorate produces annual reports. The most recent published report (2012) does not contain any alarming figures regarding violations in the forest sector as compared with other sectors. As a result of 12,389 inspection operations, the 2012 report shows 12 infringements for the forest sector involving failure to make declarations to the social administration (URSSAF and social security) and 21 infringements regarding the employment of foreign workers without work permits. The reports states that there was an increase in infringements detected in the agricultural sector</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"> - Circular DGPAAT/SDFR/C2009-3077 of 1/07/2009 - Decree n° 2010-1066 of 7/09/2010 - Order of 7/06/2013 <p>• Concerning professional qualification and competence certificates of professional forest managers and forest experts :</p> <ul style="list-style-type: none"> - Decree 2012-1042 of 11/09/2012 concerning implementation of article L315-1 of the Forest Code relating to professional forest managers - Order of 29/11/2012 concerning the dossier to be compiled to obtain a certificate acknowledging competence as a professional forest manager - Circular DGPAAT/SDFB/C 2013-3004 of the 9/01/2013 implementing the system of professional forest managers - Decree n°2010-959 of 25/08/2010 concerning arrangements relating to the exercise of the profession of forestry and agricultural expert, and the profession of forestry expert within a company - Decree n°2013-340 of 22/04/2013 concerning codification of the provisions for the corporate exercise of the profession of land-tenure and agricultural expert, and of forest expert <p>Legal Authority</p> <p>The Labour Inspectorate is responsible for monitoring the compliance of companies with the labour legislation.</p> <p>Unions for collecting social security contributions and family allowances (Unions de recouvrement des cotisations de sécurité sociale et d'allocations familiales - URSAAF), Social security services.</p> <p>Legally required documents or records</p> <p>Contracts, evidence of payment of social security contributions, pay slips, training programmes and certificates attesting participation in training activities,</p>		<p>(including the forest sector) between 2010 and 2012, but explains that this is mainly due to an increase in monitoring and enforcement.</p> <p>These figures confirm that an efficient monitoring system is in place and as a consequence the risk for this indicator is low.</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	membership of workers' organizations. Reports from the supervisory administration, i.e. the Labour Inspectorate.		
Third parties' rights			
1.13 Customary rights	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> Concerning the use of forests for recreational purpose: Forest Code L122-9 to L122-11 Concerning usage rights in public forests: Forest Code L241-1 to L241-19; L242-1 to L244-1; L213-24 to L213-26, L261-9 to L261-11; R241-1 to R243-3 and R261-9 to R261-17 Concerning usage rights in private forests : Forest Code L314-1 to L314-3 Concerning the right to hunt: for public forests R213-45 to R213-68. <p>In general, Environment Code L420-1 to L429-40 and R421-1 to R429-21</p> <p>Legal Authority Administrative court rules in the event of disputes</p> <p>Legally required documents or records -</p>	Forest Code	<p style="text-align: center;">Low risk</p> <p>Some usage rights exist and are well regulated under the Forest Code and the Environment Code.</p> <p>The usage right defined by law relates to grazing and use of firewood.</p> <p>Grazing in State forests comes under several different categories, and the numbers of animals allowed depends on the number of rights-holders.</p> <p>The mayor of the municipality concerned must publish a list of all usage rights holders. Usage rights must be exercised, or they may be forfeited. If a person's rights are lost despite his having made effective use of the forest, compensation may be sought.</p> <p>If any form of activity affects the forested land trade, unions or councils will meet to uphold the rights of the holders. The grazing of sheep and goats need special permission. An individual is entitled to free his woods and forests of all timber usage rights. It is for the forest owner to designate the paths by which the animals must pass to reach gazing areas.</p> <p>No user is permitted to cut wood for heating of construction himself. The timber must be delivered by a forestry enterprise. The wood may not be sold or exchanged by the rights-holder.</p> <p>Usage rights in France are well regulated. In the event of a dispute, compensation may be payable and the matter brought before the administrative court. As private forest owners can legally deny the use of their forest, the risk of violation of grazing rights is low.</p> <p>The risk associated with this indicator is therefore considered low.</p>
1.14 Free prior and informed consent	<p>Applicable laws and regulations</p> <p>N/A. There is no legislation in France covering "free prior and informed consent" in connection with transfer of forest management rights and customary</p>	N/A	N/A

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>rights to the organization in charge of the harvesting operation.</p> <p>Legal Authority N/A</p> <p>Legally required documents or records N/A</p>		
1.15 Indigenous peoples rights	<p>Applicable laws and regulations N/A. Considering the United Nations definition of Indigenous People, the FSC Standard for France states that there are no indigenous people on the French mainland. As a result, these criteria are not applicable.</p> <p>Legal Authority Legally required documents or records</p>	N/A	N/A
Trade and transport			
1.16 Classification of species, quantities and qualities	<p>Applicable laws and regulations N/A. Volume, species and qualities is information that appears on the selling contracts template distributed by the Regional Forest Owners' Center. But there is no specific legislation covering how harvested material is classified in terms of species, volumes and qualities in connection with trade and transport.</p> <p>Legal Authority Legally required documents or records</p>	<p>Model sale contracts: http://www.bois-forets.com/index.php?page=vente_de_bois and http://www.crpf.fr/bretagne/pdf-information/CRPF%20Bulletin64%20spe.pdf</p>	N/A
1.17 Trade and transport	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> Concerning legally required transport documents: 	Forest Code	<p style="text-align: center;">Low risk</p> <p>French law requires that each truck transporting material (be it wood or other merchandise) must have a corresponding invoice, as</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>- Order of 9th November 1999 relating to transport or hire documents that must be carried in vehicles transporting goods on the roads, art. 2, 4, 7, 8, 9</p> <p>- Order of 22nd April 2010 relating to road transport of goods documents and the combined transportation of goods, which modifies art. 4 and 7 above the previous text listed above.</p> <p>- Decree n° 99-752 of 30th August 1999 relating to goods transport by road, art. 12, 17 and 19</p> <p>- Order of 25th September 1991 relating to combined transportation between EU Member States, amended by the Order of 21st February 1995;</p> <p>About the requirements to be applied by the transport company:</p> <p>Decree no. 2009-780 of 23rd June 2009 relating to the transport of Roundwood, supplementing the Highway Code</p> <p>Legal Authority</p> <p>Police and customs - Chamber of Commerce and Industry (Chambre de commerce et d'industrie)</p> <p>Legally required documents or records</p> <p>Delivery notes, transport documents</p>		<p>well as a removal order or delivery note which describes the quantity and quality of the material transported.</p> <p>Checks on the roads are conducted by the Police and Customs and are frequent and effective.</p> <p>There are no records of violations of the applicable legislation so far that would qualify this indicator as of specified risk.</p>
1.18 Offshore trading and transfer pricing	<p>Applicable laws and regulations</p> <p>CGI (Code general des impôts / General Tax Code), Articles 57 and 238A;</p> <p>- Reversal of the burden of proof in certain audit situations, April 1996 (Article L13 B).</p> <p>- Transfer pricing documentation requirement, 2010 (Article L 13 AA and L 13 B with tax instruction 4 A–10–10 dated 23 December 2010).</p> <p>The concept of <i>acte anormal de gestion</i> (an abnormal act of management) also allows the FTA to deny tax deductions for expenses which are not related to normal acts of management or could not be deemed</p>	<p>Administrative instruction no. BOI 4-A-8-99 of 7/09/99</p> <p>Administrative instruction no. BOI-4-A-11-05 of 24/06/2005</p> <p>Peer review report - Combined: Phase 1 + Phase 2, incorporating Phase 2 ratings - France</p> <p>Global Forum for Transparency and Exchange of Information for Tax Purposes</p>	<p style="text-align: center;">Low risk</p> <p>The international tax standard, developed by the OECD and supported by the UN and the G20, provides for full exchange of information on requests regarding all tax matters. Currently all 30 OECD member countries, including France, have endorsed and agreed to implement the international tax standard. Furthermore, all offshore financial centres accept the standard.</p> <p>France has exchange of information relationships with 150 jurisdictions through 114 DTCs, 29 TIEAs and is a signatory to 1 multilateral convention, the Convention on Mutual Administrative Assistance in Tax Matters.</p> <p>Section 57 provides that “to determine the income tax owed by companies that either depend on or control enterprises outside</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>to have been incurred for the benefit of the business. The courts decide whether this concept applies by comparing the commercial practices of the company under review with what they judge to be “normal” acts of management.</p> <p>LPF (Tax Procedure Rules): Sections L 13 AA, L 13 AB and L 13 B of the Tax Procedure Rules, which set out transfer pricing documentation requirements; and Section L 188 A</p> <p>Directive 90/436/EEC related to Convention 90/436/EEC on the elimination of double taxation in connection with the adjustment of profits of associated enterprises.</p> <p><i>Offshore trading and transfer pricing</i></p> <p>- General Tax Code: Art 57, 1735 ter (V), 209B (V) et (VD)</p> <p>Legal Authority</p> <p>Direction des Vérifications Nationales et Internationales (DVNI) (National and International Audit Department) for companies with a turnover higher than 152.4 million Euros (EUR) (higher than EUR76.2 million for service providers), subsidiaries of such companies, and their head offices.</p> <p>Directions Interrégionales de Contrôle Fiscal (DIRCOFI) (Interregional Tax Audits Department) for companies with a turnover ranging from EUR1.5 million to EUR152.4 million (up to EUR76.2 million for service providers).</p> <p>Directions des Services Fiscaux (DSF) (Departmental Tax Services Department) for small companies with turnover lower than EUR1.5 million.</p> <p>Legally required documents or records</p> <p>The amended Finance Act for 2009 introduced new requirements for transfer pricing documentation. The new documentation requirements apply to any one of the following types of entities located in France:</p>		<p>France, any profits transferred to those enterprises indirectly via increases or decreases in purchase or selling prices, or by any other means, shall be added back into the taxable income shown in the companies’ accounts. The same procedure shall apply to companies that depend on an enterprise or a group that also controls enterprises outside France”.</p> <p>This requirement may be applied only in relation to cross-border transfer pricing issues. Enforcement of Section 57 requires tax authorities to prove that a dependent relationship exists between the parties involved in the transaction under review and that a transfer of profits has occurred. However, it is not necessary to prove dependency when applying Section 57 to transfers between entities within France and related entities operating in tax havens.</p> <p>Several cases over the years have established important principles for dealing with transfer pricing issues. These include:</p> <ul style="list-style-type: none"> - Parent-subsidiary relations: expenses invoiced by a foreign parent company - SA Borsumij Whery France, CAA (Cour Administrative d’Appel) Paris 11 February 1998 - Parent-subsidiary relations: partnership - SA Cogedac, CE 23 November 2001 - Reality of services - SA Bossard Consultants, CAA Paris 17 March 1998 - Date to use when appraising a transfer pricing transaction - CE Ford France and CAA Paris 4 October 1994 - Comparable searches - Pharma Industrie, CAA Paris 12 July 1994; CE Galerie Vercel 28 September 1998; SARL Solodet, CE, 21 February 1990; Reynolds Tobacco, CAA Paris, 20 November 1990; SARL les fermiers de l’Aisne, CE, 12 February 1993; Lindt et Sprungli CE, 4 December 2002; Novartis Groupe France SA, CAA Paris, 25 June 2008; Man Camions et Bus, CAA Versailles, 5 May 2009 <p>The resources available to the tax authorities to devote to transfer pricing investigations are increasing. Major multinational entities are audited by the <i>Direction des Vérifications Nationales et Internationales (DVNI)</i> (National and International Audit Administration). The DVNI is responsible for auditing all companies with a turnover in excess of EUR 152.4 million (for industrial companies) or in excess of EUR 76.2 million (for</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>a. with turnover or gross assets on the balance sheet exceeding EUR 400 million;</p> <p>b. that hold directly or indirectly more than 50% of capital or voting rights of a legal entity mentioned in (a);</p> <p>c. with more than 50% of their capital or voting rights held directly or indirectly by a legal entity mentioned in (a);</p> <p>d. that benefit from a ruling granting a worldwide tax consolidation regime; and</p> <p>e. that are part of a French tax group in which at least one legal entity of the tax group meets one of the requirements mentioned under (a), (b), (c) or (d).</p> <p>This new law requires formal and compulsory transfer pricing documentation, including the following information:</p> <p>1. General information on the group:</p> <ul style="list-style-type: none"> • general description of the activity, including changes that occurred during the audited years; • general description of the legal and operational structures of the group of associated enterprises, identifying the associated companies engaged in audited transactions; • general description of the functions performed and the risks borne by the associated companies to the extent they have an impact on the audited company; • a list of the main intangible assets having a link to the audited company (e.g. patents, trademarks, trade names, know-how, etc.); and • a broad description of the transfer pricing policy. <p>Specific information on the audited company and on the transfer pricing policy:</p> <ul style="list-style-type: none"> • a description of its activities, including changes that took place during the audited period; 		<p>service companies).</p> <p>There is no information available that indicates that the forest industry is a high-risk industry for transfer pricing. The system in France for monitoring transfer pricing illegalities is extensive and well resourced. This indicator has been evaluated as low 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"> • information on operations carried out with other associated enterprises, including nature and amount of flows (global flows per category of transactions; this covers royalties in particular); • a list of cost-sharing agreements, advance pricing agreements (APAs) and rulings obtained having an impact on the results of the company; • a description of the transfer pricing policy with an explanation of the selection and application of the retained method, in compliance with the arm's-length principle and with the analysis of the functions performed, of the risks borne and of the assets used by the audited company; and • where relevant, an analysis of the comparability elements taken into account in the application of the retained transfer pricing method. 		
1.19 Custom regulations	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> • Customs Code: - specifications regarding imports: Art. 23 bis, 68 to 82 - specifications regarding exports: Art. 22 and 23, 83 - classification: Art. 28 • COUNCIL REGULATION (EC) no. 2173/2005 of 20 December 2005 on the establishment of a FLEGT licensing scheme for imports of timber into the European Community • Commission Regulation (EC) no. 1024/2008 of 17 October 2008 laying down detailed measures for the implementation of Council Regulation (EC) no. 2173/2005 on the establishment of a FLEGT licensing scheme for imports of timber into the European Community <p>Legal Authority</p> <p>Customs</p>	Forest Code	<p style="text-align: center;">Low risk</p> <p>The French Customs Code clearly defines requirements regarding imports and exports. The checks on roads and on key entry points (such as airports or harbours) are conducted by Customs Officers and Police and are frequent and effective.</p> <p>There are no records of violations of the applicable legislation so far that would qualify this indicator as having specified risk.</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>Export and import licence</p>		
1.20 CITES	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> • Washington Convention, CITES, 1973 • Council Regulation (EC) no. 338/97 of 9 December 1996 on the protection of species of wild fauna and flora by regulating trade therein • Commission regulation (EC) no. 1497/2003 of 18 August 2003 amending Council Regulation (EC) no. 338/97 on the protection of species of wild fauna and flora by regulating trade therein • Commission Regulation (EC) no. 1808/2001 of 30 August 2001 laying down detailed rules concerning the implementation of Council Regulation (EC) no. 338/97 on the protection of species of wild fauna and flora by regulating trade therein <p>Legal Authority</p> <p>The Ministry for Environment and its regional representative: Directions Régionales de l'Environnement, de l'Aménagement et du Logement (DREAL) (Regional Direction for Environment, Land use planning and Housing)</p> <p>Customs for the inspection operations</p> <p>Legally required documents or records</p> <p>CITES export and import permits and CITES certificates enabling intra- EU trade, registration documents</p>	<p>Explanation of CITES by the Customs Administration</p>	<p>Low risk</p> <p>No woody species produced in France are mentioned in the CITES lists and the risk can therefore be considered low.</p>
Diligence/due care procedures			
1.21 Legislation requiring due diligence/due care procedures	<p>Applicable laws and regulations</p> <ul style="list-style-type: none"> • REGULATION (EU) no. 995/2010 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 20 October 2010 laying down the obligations of 	<p>Presentation of the EUTR by the competent French authority</p> <p>List of competent authorities, including for France</p>	<p>Low risk</p> <p>The French Competent Authority (CA) has been designated in compliance with the EU requirements. The French CA is the French Ministry of Agriculture and Forests. The Ministry has actively informed stakeholders concerning the FLEGT and EUTR</p>

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>operators who place timber and timber products on the market</p> <ul style="list-style-type: none"> • COMMISSION DELEGATED REGULATION (EU) no. 363/2012 of 23 February 2012 on the procedural rules for the recognition and withdrawal of recognition of monitoring organizations as provided for in Regulation (EU) no. 995/2010 of the European Parliament and of the Council laying down the obligations of operators who place timber and timber products on the market • COMMISSION IMPLEMENTING REGULATION (EU) no. 607/2012 of 6 July 2012 on the detailed rules concerning the due diligence system and the frequency and nature of the checks on monitoring organizations as provided for in Regulation (EU) No 995/2010 of the European Parliament and of the Council laying down the obligations of operators who place timber and timber products on the market • CIRCULAR DGPAAT/SDFB/C2013-3029 of 14 March 2013 on the coming into force of EU Regulation no. 995/2010, known as the European Union Timber Regulation (EUTR) <p>LAW no. 2014-1170 du 13 October 2014 - Article 76 Future for Agriculture, Food and Forest</p> <p>Legal Authority</p> <p>The French Ministry for Agriculture, Food and Forests and its local representatives: Direction Régionale de l'Alimentation, l'Agriculture et les Forêts (Regional Direction of Food, Agriculture and Forestry)</p> <p>Legally required documents or records</p> <p>Due diligence system, valid register with the mandatory information, FLEGT certificate, CITES license, legality certificate</p>	<p>WWF UK Barometer</p> <p>Greenpeace reports:</p> <ul style="list-style-type: none"> - France, Europe :s gateway for illegal timber (2014) - Brazil, DR Congo: France a leaky sieve for illegal timber! (2014) - Press release (2014) <p>Presentation of the obligations deriving from the EUTR for forest owners and managers:</p> <ul style="list-style-type: none"> - CRPF Bourgogne - BoisLim - DRAAF Basse-Normandie 	<p>projects. The Ministry has begun raising awareness of the EUTR and role of the CA - meetings have been held with trade representatives, information has been disseminated through the CA website and a ministerial circular has been published to further clarify the EUTR and provide information on the definition of due diligence systems.</p> <p>Legislation to enforce the EUTR was not issued until October 2014, and thus the French CA have not been able to enforce the EUTR prior to this.</p> <p>Control activities began in early 2015, and three forest entities were inspected in the first part of 2015.</p> <p>The results of the inspections indicated that small forest entities had a good understanding of the requirements, but lack procedures. The CA will follow up on this with additional information and inspections.</p> <p>Additional inspections were planned for the second half of 2015. Future inspections will focus on importing companies, where the risk of illegal trade is considered higher.</p> <p>According to the French Competent Authority, Forest owners selling already harvested wood and operators buying standing wood and harvesting it have the following due diligence obligations:</p> <ul style="list-style-type: none"> • They shall be given information about species, region of origin and quantity of wood bought • They shall verify that the harvesting operation is legal, that is to say that it is done in compliance with the management documents or through a special administrative authorization and that it is in compliance with environmental regulations. In order to prove that the harvesting operation is legal buyers can ask the forest owner to sign an official document (template) • They shall pass this information to their clients • They shall keep the records of this information for 5 years. <p>The Competent authority has also advised that :</p> <ul style="list-style-type: none"> - Wood coming from public forests and from private forests managed by Professional Forest Managers is automatically considered as low risk by the French Competent Authority. The only control measure needed from the operator would then be to

Indicator	Applicable laws and regulations, legal Authority, & legally required documents or records	Sources of Information	Risk designation and determination
			<p>conserve this evidence (and data regarding species, volume, etc.). This is mentioned in CIRCULAR DGPAAT/SDFB/C2013-3029.</p> <p>- For other private forests, the operator shall ask the owner to testify on the legality of the harvested wood through an annex to the contract.</p> <p>There is limited evidence to suggest that the DDS requirements are uniformly enforced at forest level. However, since CW Categories 1.1-1.20 have been found to be of low risk, it is concluded that the potential impact of this lack of enforcement will be limited both in impact and in scale. As a consequence, the risk is considered to be low.</p>

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.	France	Low risk All low risk thresholds (1, 2, 3, 4 and 5) are met and there is no other evidence of specified risk. 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.	France	Low risk Low risk thresholds 10 and 12 apply. None of the specified risk thresholds are met.
2.3. The rights of Indigenous and Traditional Peoples are upheld.	See detailed analysis below.	France	Low risk Low risk thresholds 16 and 21 are met. There are no Indigenous Peoples or traditional peoples in Metropolitan/mainland France, and there is no evidence that challenges the low risk designation.

Control measures

N/A

Detailed analysis

Sources of information	Evidence
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.	
Guidance <ul style="list-style-type: none"> Is the country covered by a UN Security Council 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? 	
Compendium of United Nations Security Council Sanctions Lists	There is no UN Security Council ban on timber exports from France.
US AID	France is not covered by any other international ban on timber export.
Global Witness	There are no individuals or entities involved in the forest sector in France that are facing UN sanctions.
Information from FSC France/French CW Working Group	All information in line with the above.
Guidance <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? 	
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	No information found on France as a source of conflict timber.
Global Witness	No information found on France as a source of conflict timber.
Human Rights Watch	No information found on France as a source of conflict timber.
Institute for Economics and Peace : Global Peace Index	See Introduction
World Resources Institute (Institut des ressources mondiales), now PROFOR: Governance of Forests Initiative Indicator Framework (Version 1)	This work resulted in a publication: Assessing and Monitoring Forest Governance : A user's guide to a diagnostic tool (available on this page) published by PROFOR in June 2012. This tool has not yet been applied to France.
Amnesty International Annual Report	No information found on France as a source of conflict timber.
World Bank : Worldwide Governance Indicators, indicator 'Political Stability and Absence of Violence'	In 2015 (the last year for which information is available), for the <i>Political Stability and Absence of Violence</i> indicator, France scored 57 (scores range from 0 (the lowest) to 100 (the highest), the higher the score the better the performance). France achieved far better results for other indicators, such as <i>Government Effectiveness, Regulatory Quality and Rule of Law</i> (see Introduction).
CIFOR	France is not mentioned in this document about <i>Forests and conflict</i> .

Greenpeace Search for 'timber conflict [France]'	No information found on France as a source of conflict timber.
Google the terms '[France]', 'timber', 'conflict', 'illegal logging'	No further information found on France as a source of conflict timber.
Information from FSC France/French CW Working Group	According to available sources, France is not designated as a country where wood is a source of conflict.
<p>Conclusions on indicator 2.1: Low risk</p> <p>No information was found on France as a source of conflict timber and the forest sector is not associated with any violent armed conflict.</p> <p>The following low risk thresholds apply:</p> <p>(1) The area under assessment is not a source of conflict timber¹; AND</p> <p>(2) The country is not covered by a UN security ban on exporting timber; AND</p> <p>(3) The country is not covered by any other international ban on timber export; AND</p> <p>(4) Operators in the area under assessment are not involved in conflict timber supply/trade; AND</p> <p>(5) Other available evidence does not challenge 'low risk' designation.</p>	
<p>Indicator 2.2. Labour rights are respected including rights as specified in ILO Fundamental Principles and Rights at work.</p> <ul style="list-style-type: none"> • Are 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? Category 1? • Is there evidence that any of the categories (including women) feels adequately protected with regard 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
<p>Status of ratification of fundamental ILO conventions or use ILO Core Conventions Database</p> <p>Ratification as such should be checked under Category 1. In Cat. 2 we take that outcome into consideration. Please refer to it.</p>	France has ratified all the 8 Fundamental ILO Conventions. The status on the ILO website for all 8 Conventions is 'in force'.
<p>ILO Declaration on Fundamental Principles and Rights at Work. Country reports.</p> <p>Source of several reports. Search for 'racial discrimination', 'child labour', 'forced labour', 'gender'</p>	<p>France is mentioned 41 times in this report, mostly in relation to minor/non-substantial issues of discrimination, such as on gender, migrants, older or disabled people. No reference to risks of 'child labour', 'forced labour'.</p> <p>Several documents found that discuss 'forced labour', also in Europe. No information found that France has a specified risk and no link found to the French forestry sector.</p>
ILO Child Labour Country Dashboard	France does not feature in the ILO Child Labour Country Dashboard, which indicates a low risk of child labour in France.

¹ "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.

Global March Against Child Labour	No references to France regarding child labour or child trafficking.
Office of the United Nations High Commissioner for Human Rights (OHCHR), Committee on Rights of the Child: France homepage	<p>“73. Children are entering or travelling through France for the purposes of theft, begging and prostitution. Many of them are trafficked by force while others travel of their own volition - some later becoming caught up in trafficking networks. The majority of these children come from Eastern Europe - notably Romania - and from West Africa.</p> <p>74. The Government of France is attempting to work with the Governments of countries from which the children originate. Good cooperation has been established with the authorities of Romania and the two police forces are working together to ensure the protection of any child who is returned to Romania. NGOs report that the accords between France and Romania in this respect do appear to be working.”</p> <p>No further mentioning of indications of significant child labour or child trafficking in the report.</p>
ILO Helpdesk for Business on International Labour Standards	No information found on serious violations of Labour rights in France.
Committee on the Elimination of Discrimination against Women: most recent report for France Refer to CW Cat. 1	<p>“Since France's last hearing before the Committee on the Elimination of Discrimination against Women (the Committee), on July 3, 2003, fresh impetus has been given to national policies aimed at promoting women's rights and equality between men and women.</p> <p>These policies are in line with the provisions of the Convention on the Elimination of All Forms of Discrimination against Women (the Convention).”</p>
Human Rights Watch	This submission to the UN Human Rights Committee on Concerns and Recommendations on France is from 2014 and makes no reference to issues of not respecting labour rights in France. No further references found regarding France and violations of labour rights.
Child Labour Index 2014 produced by Maplecroft.	France scores 'low risk' on the Child Labour Index 2014
Google the terms '[France]' and one of following terms 'labour rights', 'child rights', 'forced labour', 'slave labour', 'discrimination', 'gender gap labour', 'labour union'	<p>Instances of forced labour and/or discrimination can always take place, and this is also true of France. See for example this report from the Joseph Rowntree Foundation. It also mentions France as a good example of how to solve this problem through by drawing up and implementing appropriate regulations.</p> <p>No further references found to labour rights violations in France or to the French forest sector in specific.</p>
Information from FSC France/French CW Working Group	<p>“French legislation relating to labour law is strict and in line with European and international requirements. In particular, it requires the existence of an employment contract. Moreover, there are specific laws concerning the elimination of child labour and protection of children and young persons. The State Labour Inspectorate supervises this legislation.”</p> <p>Reference is made to this website where there is an overview of French regulations regarding child labour and/or protection of children, produced by the ILO.</p> <p>The above evidence is provided on the assumption that the law is enforced (Please refer to Category 1 assessment).</p>
<p>Conclusions on indicator 2.2: Low risk</p> <ul style="list-style-type: none"> • Social rights are covered by relevant legislation. • Rights such as freedom of association and collective bargaining are upheld. See also findings in section <i>Context</i>. • There is evidence to confirm the absence of compulsory and/or forced labour. Although there is no evidence confirming complete absence, it may be concluded that this is very limited from the international perspective. • There is evidence to confirm the absence of discrimination in respect of employment and/or occupation, and/or gender. Although there is no evidence confirming complete absence, it may be concluded that this is very limited from the international perspective. • There is evidence to confirm an absence of child labour, although it is not reported on a large scale and only in relation to forced prostitution. 	

- The country is signatory to the relevant ILO Conventions.
- There is no evidence that all groups (including women) feel adequately protected in relation to the rights mentioned above. This specifically concerns the Roma minority.
- Evidences of minor violations of labour rights are limited in international terms.

The following low risk thresholds apply:

(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 the relevant Category 1 indicators confirms the enforcement of applicable legislation ('low risk'); [Compare the assessment for category 1]

AND

(12) Other available evidence does not challenge the 'low risk' designation.

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

- Are there Indigenous Peoples (IP), and/or Traditional Peoples (TP) present in the area under assessment?
- Are the regulations contained in 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 is there to can demonstrate the enforcement of the laws and regulations identified above? (refer to category 1)
- Is 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
ILO Core Conventions Database : ILO Convention 169	France did not ratify Convention 169. Therefore this source does not provide information on its implementation by France.
Other sources ²	No sources mention the presence of IPs/TPs in Metropolitan France, e.g. 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 featuring discussion or debate of the matter.
Information from FSC France/French CW Working Group	"The French FSC standard (for Forest Management) finds that there are no indigenous communities as defined by FSC STD in Metropolitan France (FSC-STD-FRA-01-2012). Moreover, traditional rights in public and private forests are framed by legislation; respectively the Forest code, chapter VIII, and the Civil and Penal Code. "According to the UN definition, there are no indigenous people in Metropolitan France. Therefore this principle has no application. Logically, Global Witness does not mention situations of violation of civil or traditional rights in France."

Conclusions on indicator 2.3: Low risk

No indigenous peoples and no traditional peoples in France.

Therefore, the following 'low risk' thresholds apply:

(16) There is no evidence leading to a conclusion of the presence of indigenous and/or traditional peoples in the area under assessment;

² [Survival International](#); [Human Rights Watch](#); [Amnesty International Annual Report](#); [The Indigenous World](#); [World Directory of Minorities and Indigenous Peoples](#); [UN Special Rapporteur on the Rights of Indigenous Peoples](#); [UN Human Rights Council Universal Periodic Review](#); [Intercontinental Cry](#) (Americas website); [Forest Peoples Programme](#); [Society for Threatened Peoples](#); Regional human rights courts and commissions ([Inter-American Court of Human Rights](#); [Inter-American Commission on Human Rights](#); [African Commission on Human and Peoples' Rights](#); [African Court on Human and Peoples' Rights](#); [European Court of Human Rights](#))

AND

(21) Other available evidence does not challenge the 'low risk' designation.

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

Overview

Assessment methods

The method employed for risk assessment is based on findings from the pilots and the initial experiences made by FSC International since the introduction of the procedure FSC-PRO-60-002a V1-0.

The assessment scheme follows three fundamental questions:

- Is the conservation value as stipulated in the indicator and present as defined for France?
- If yes, does forest management represent a danger?
- If yes, are protection mechanisms in place, are these sufficiently effective or, if impairments do exist, are compensation and correction measures, possible?

The assessment proceeds by means of a research of literature and 'grey' sources such as internet sources, expert statements and protocols, progressing from the general to an ever increasing level of detail, so that an information base is created. Employing the above sequence of questions, as soon as the finding 'low risk' can be arrived at, no further research pertaining to the subsequent questions need be pursued.

There are essentially three situations by which the assessment comes about:

- The three questions can, on the basis of a sufficient bedrock of information, unequivocally be answered with the finding 'low risk.' For this to occur, the information base must be such that there are no substantive suggestions that a 'specified risk' exists.
- The three questions can, on the basis of a sufficient bedrock of information, unequivocally be answered with the finding 'specified risk.' Here it is in turn necessary to countercheck whether there may in fact be indications that a classification as 'low risk' could apply.
- Where indications for either a 'low risk' or a 'specified risk' exist, according to paragraph 2.4.4 of FSC-PRO-60-002a the precautionary approach shall apply and the weighting of the assessment shall tend towards 'specified risk' and, consequently, control measures will be suggested. This precautionary principle is only applied when the assessment is decided by the final question on the decision tree and when the corresponding finding is the assumption of a 'low risk.'

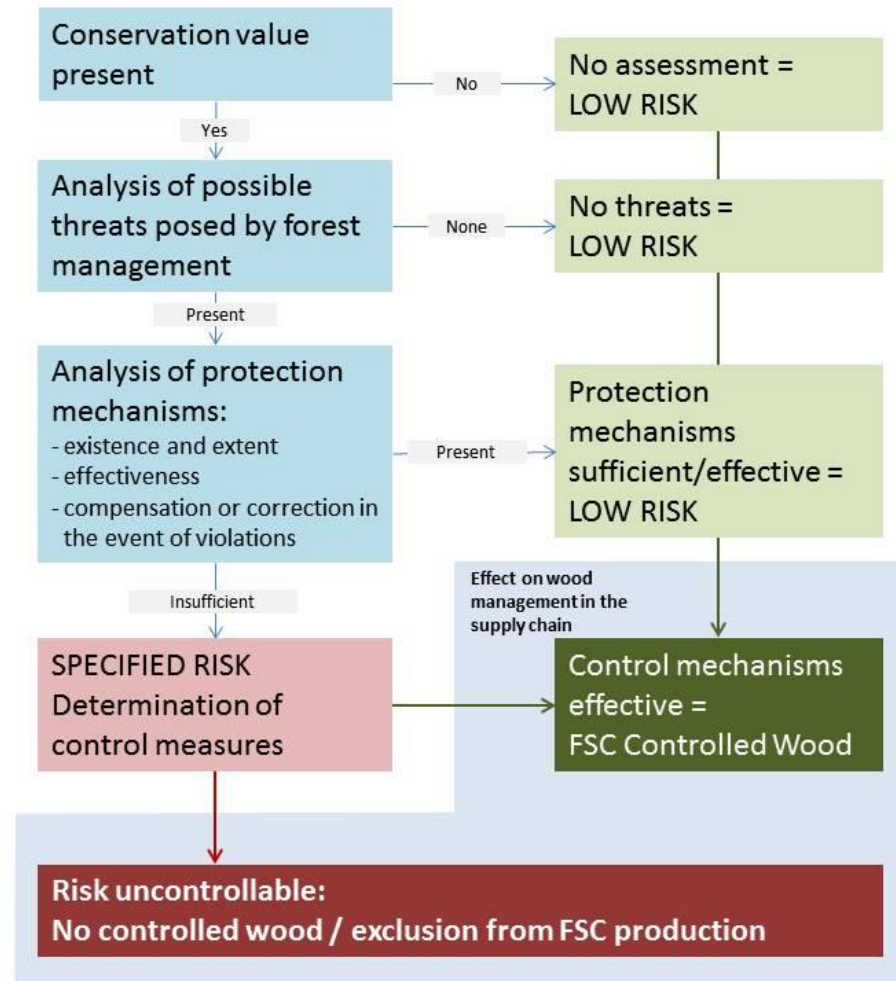
Figure 1 illustrates the approach and the application of the results of the risk assessment by the enterprises wishing to declare wood sourced in France as FSC controlled wood.

When assessing whether sufficient protection measures are in place, and whether these are effective, the three questions below are asked in sequence:

- Are protection measures in place?
- If yes, the following question applies: Are the specified protection measures sufficiently effective to control threats?
- If no, the following question applies: Do compensation or corrective measures follow violations of or non-compliance with protection measures?

Only once these specific questions have produced a negative finding is the risk classified as a 'specified risk.'

Assessment scheme / decision tree per controlled wood category



Definition of the categories for high conservation values

High conservation values (HCVs) refer to biological, ecological, social or cultural values of exceptional or key significance. There are six HCV categories that are taken into consideration (Brown et al. 2014). The following definitions taken from the French FSC Forest Standard (FSC-STD-FRA-01-2016 Metropolitan France EN) are applied for the purposes of the risk assessment:

The national framework for High Conservation Values (HCVs) defines 2 categories of HCV:

- Systematic HCVs, considered at the national level,
- Additional HCVs, considered at the local level using the best available information.

The national risk assessment for controlled wood on High Conservation Values (HCVs) takes into accounts systematic HCVs, as defined below. Additional HCV status can be determined only in local scale by the owner/manager with the best information available: field data, bibliography, stakeholders' consultation. It could be some areas subjected to specific regulations (for Type 1 & 3 HCV, the other status is often redundant with systematic HCV), or some areas with a very local importance (by example for the forest owner). The specific regulations applied to many potential additional HCV are in fact considered risk mitigation factors. A national analysis of these additional HCVs is therefore not relevant in this control wood national risk assessment.

HCV 1 *Species diversity*. Concentration of biological *diversity* including endemic, *rare* and *endangered* species of significance on a global, regional or national level.

Definition for France: *Type-1 Zones Naturelles d'Intérêt Ecologique Floristique et Faunistique (Natural areas of interest for fauna and flora), Natura 2000 sites (Special Protection Areas –SPA-, Special Areas of Conservation -SAC)*

HCV 2 *Landscape ecosystems* and mosaics. Large *landscape ecosystems* and ecosystem mosaics of significance on a global, regional or national level and which contain viable populations of the large majority of the naturally occurring species in their natural composition with respect to distribution and frequency.

Definition for France: *no HVC 2*

HCV 3 *Ecosystems and habitats*. Rare, threatened or endangered *ecosystems, habitats* and *refuges*.

Definition for France: *Same that HCV 1: Type-1 Zones Naturelles d'Intérêt Ecologique Floristique et Faunistique (Natural area with interest for fauna and flora), Natura 2000 sites (Special Protection Areas, Special Areas of Conservation)*

HCV 4 *Special ecosystem services*. Fundamental, *endangered ecosystem services* including the *protection* of water catchment areas and protection against the erosion of endangered soils and slopes.

Definition for France: *Protection forests (other than peri-urban) subject to regulation*

HCV 5 *Needs of the resident communities*. Sites and resources satisfying the basic needs of *resident communities* and *indigenous populations* (for their basis of existence, health, nutrition, water, etc.); identified with the *participation* of the *local communities/indigenous population*.

Definition for France: *Immediate and proximate water catchment protection areas*

HCV 6 *Cultural values*. Sites, resources, *habitats* and *landscapes* of global or national cultural, archaeological or historical significance and/or or key cultural, ecological, economic or religious significance for the traditional cultures of the *resident communities* or *indigenous population*; identified with the *participation* of the *resident communities* and *indigenous population*.

Definition for France: *Peri-urban protection forests subject to regulation*

Forest management may have negative impacts on some forest environments (including the associated natural environments) forming part of the areas listed before (mainly HCV 1 or 3): destruction of heritage habitats and/or species habitats, and micro-habitats (disappearance of dead wood and habitat-trees as a result of the renewal of stands).

Experts consulted

	Name	Organization	Area of expertise (category/sub-category)
1.	Daniel Vallauri	Environmental Chamber	Forest and Forest products program manager at WWF France Extensive knowledge of biodiversity and forest management issues
2.	Laurent Larrieu	Institut National pour la Recherche Agronomique (National research institute for agronomy)	Extensive knowledge of biodiversity and forest management issues
3.	Julien Touroult	Museum National d'Histoire Naturelle (National museum of natural history)	Extensive knowledge of biodiversity and forest management issues

Risk assessment

Indicator	Sources of Information	HCV occurrence and threat assessment	Functional scale	Risk designation and determination
3.0 Data available are sufficient for: a) Determination of HCV presence for each HCV, AND b) The assessment of the threats to HCVs from forest management activities.	<p><u>INPN:</u></p> <ul style="list-style-type: none"> • <u>Protected areas</u> • <u>ZNIEFF</u> • <u>Natura 2000</u> • <u>Species inventories</u> • <u>Red lists</u> <p><u>UICN France (2013), Les espaces naturels protégés en France : une pluralité d'outils au service de la conservation de la biodiversité, Paris, 44 pages.</u></p> <p>Sotirov, M. (editor), 2017. Natura 2000 and Forests – Assessing the State of Implementation and Effectiveness. What Science Can Tell us 7 2017. European Forest Institute.</p>	<p>Data availability for the determination of HCV presence</p> <p>The 6 different categories of HCV were defined by the Standard Development Group on the basis of:</p> <ul style="list-style-type: none"> - discussions with three groups of experts consisting of scientists, naturalists, managers of forests or nature reserves, representatives of institutions and local authorities, independent auditors. The actors who have participated, intermittently or continuously, the groups of experts are listed in the Annex E of the National Forest Stewardship Standard for Metropolitan France (FSC-STD-FRA-01-2016). - feedback from public consultation; - work already done in other European countries (Romania, Slovakia, Portugal, Spain). <p>A huge amount of data is available on the website of the National Inventory of Natural Patrimony (INPN), concerning protected species and their distribution area. The INPN gathers all data from local and regional organisms: regional delegations of Environment minister, Natura 2000 network (Maciejewski, 2016) National Forest Office, local associations, Botanical Conservatoires, national parks, reserves, etc. This data is available as maps and technical sheets with recommendations for management, as well as reference to the applicable regulation.</p>	France	<p>Low risk</p> <p>The following thresholds are met: (1) Data available are sufficient for determining HCV presence within the area under assessment and (2) Data available are sufficient for assessing threats to HCVs caused by forest management activities.</p>

	<p>Easac, 2017, Multi-functionality and sustainability in the European Union's forests, EASAC policy report 32, 43 p.</p> <p>ONB, 2017, État de la biodiversité en France, 4 p.</p> <p>Paillet Y., 2017. Forest biodiversity monitoring networks in France: an analysis using Essential Biodiversity Variables. Naturae 6: 1-11.</p> <p>Basilico L., Bontemps F., Sapijanskas J., Gosselin F., 2014, Quels indicateurs pour la biodiversité forestière ? Synthèse BGF, 4 p</p> <p>Research project Biodiversity, Forest management and public policies.</p> <p>IGN, 2015. Indicators of sustainable management, 343 pages.</p> <p>IGN, 2017, National Forest Inventory Memento, 32 p.</p> <p>Maciejewski, L., 2016. <i>État de conservation des habitats forestiers d'intérêt communautaire, Evaluation à l'échelle du site Natura 2000, Version 2. Tomes 1 et 2.</i> Mars 2016. Rapport SPN 2016-75, Service du patrimoine naturel, Muséum national d'Histoire naturelle, Paris. 82 p. + 62 p.</p> <p>BENSETTITI F. et J. TROUVILLIEZ, 2009 – Rapport synthétique des</p>	<p>Information is equally publicly available for each protected area or biodiversity inventory area on the INPN website, as well as for other HCVs on public agencies websites (ONF, ONEMA, ARS – Regional Health Agency, etc.).</p> <p>National and local NGOs (WWF France, France Nature Environnement and its regional network, LPO and its regional network, etc.) also provide additional data on forest related biodiversity issues.</p> <p>The National Forest Inventory publishes every 5 years the Sustainable Forest Management Indicators (Indicateurs de gestion durable, IGD in French; IGN, 2015). This document includes extensive information about composition, structure and diversity of French forests. The category “Biological diversity of forests” includes the following indicators: local richness of forest species, type of regeneration, natural character of forests, part of very old stands, part of indigenous tree species, amount of dead wood, genetic diversity of trees, fragmentation of forest massifs, endangered forest species, forests and forested moors protected for biodiversity.</p> <p>Moreover, France is signatory of numerous international and European agreements and regulations on the protection of biodiversity, such as the Habitats Directive, the Convention on Biological Diversity and CITES. The implementation of these agreements requires, among other things, the identification and management of conservation values.</p> <p>The SDG conclude that data is available and adequate for defining HCVs occurrence appropriately in Metropolitan France.</p> <p>Data availability for the assessment of the threats to HCVs from forest management activities</p> <p>The IGD (IGN, 2015) are more and more precise regarding environmental, social and protection aspects which enables to assess threats to HCVs, even if there is still a need for improvement in this field. For example, methodology and data recollection for dead wood accounting, analysis of old-growth and ancient forests, which are useful to assess threats to some HCV 1&3 depending on late stages of the forest cycle, could be improved.</p> <p>The National Natural History Museum (MNHN) realizes a periodic assessment of Natura 2000 network (Bensettiti & Trouvilliez, 2009; Bensettiti & Puissauve, 2015), which identify threats to species and habitats, as well as their conservation status.</p>	
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	<p>résultats de la France sur l'état de conservation des habitats et des espèces conformément à l'article 17 de la directive habitats . Rapport SPN 2009/12, MNHN-DEGB-SPN, Paris, 48 p. BENSETTITI F. & PUISSAUVÉ R., 2015. – Résultats de l'évaluation de l'état de conservation des habitats et des espèces dans le cadre de la directive Habitats-Faune-Flore en France. Rapportage « article 17 ». Période 2007-2012. MNHN-SPN, MEDDE, Paris, 204 p.</p>	<p>With these elements, the SDG conclude that, compare on an international level, the data are available and adequate for appropriately defining the threats to HCVs from forest management in Metropolitan France.</p>		
<p>3.1 HCV 1 Does the area under assessment contain HCV 1? Does the area under assessment contain, or may it contain (using a precautionary approach), critical temporal, seasonal, or ephemeral habitats/resources such as sites for roosting, breeding, hibernation, shelter and migration? Is HCV 1 threatened by management activities? Is the country signatory to the CBD and are the CBD targets met?</p>	<p>INPN:</p> <ul style="list-style-type: none"> • Protected areas • ZNIEFF • Natura 2000 • Species inventories • Red lists <p>UICN France (2013), Les espaces naturels protégés en France : une pluralité d'outils au service de la conservation de la biodiversité, Paris, 44 pages.</p> <p>Annex A: Risk assessment report for type-1 ZNIEFFs (HCV 1/3) National biodiversity observatory:</p> <ul style="list-style-type: none"> • Factors affected forest biodiversity • Wood harvesting rate 	<p>HCV 1 occurrence The SDG and working group of experts gathered to realize the HCV framework decided to place HCV 3 with HCV 1. The analysis for these two categories is therefore the same. Indeed, it seems difficult to distinguish some special species from their habitats. HCV 1 and 3 are defined as: - Type-1 Zones Naturelles d'Intérêt Ecologique Floristique et Faunistique (ZNIEFF - Natural areas of interest for fauna and flora), - Natura 2000 sites (Special Protection Areas –SPA-, Special Areas of Conservation - SAC). Type 1 ZNIEFF areas are biodiversity inventory areas and do not correspond per se to a regulated conservation or protected status. Figure 1: Localization of HCV1/3 (this map includes all Natura 2000 and Type 1 ZNIEFF areas, even if located in non-forest areas).</p>	<p>France</p>	<p>Low risk</p> <p>The following threshold is met: (7) HCV 1 is identified and/or its occurrence is likely in the area under assessment, but it is effectively protected from threats from management activities.</p>

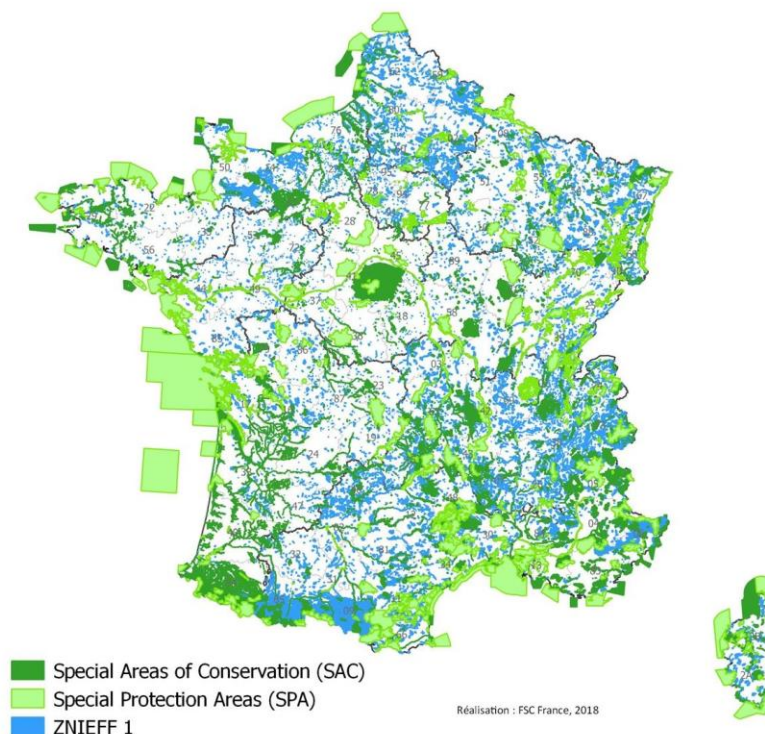
Are there any effective protection schemes covering areas with concentrations of biological diversity? Can threats caused by management activities be effectively managed using management tools?

[IUCN France \(2015\). Synthesis of the national forum "invasive alien species: towards a reinforcement of strategies for action" - Orleans, 23, 24 and 25 September 2014. Paris, France. 77 pages.](#)

[Paillet Y., Pernot C., Boulanger V., Debaive N., Fuhr M., Gilg O., Gosselin F., 2015. Quantifying the recovery of old-growth attributes in forest reserves: A first reference for France, Forest Ecology and Management 346, pp 51-64.](#)

Cambon D., 2012, Référentiel de gestion durable du pin de Salzmann, rapport ONF, 33 pages.

HVC 1/3 at national scale



Assessment of threats

However, most of HVC 1/3 are associated with or overlap with areas under a regulated status in France (UICN, 2013, and Figure 2 below). Most of them are integrated in protected areas:

- National parks,
- Natural reserves (national or regional, in private or public forests)
- Natura 2000 network (SAC and SPA)
- Arrêté préfectoral de protection de biotope (area designed by regional law for biotope protection)
- Sites belonging to the Conservatory of Natural Areas (CEN) or Coastal Conservatory.

Regarding, HCV1 fauna and flora species most of them are included in protected lists defined at different scales:

- National, regional and departmental protected species,
- Natura 2000 protected species.

HCV 1/3 benefit from regulated status

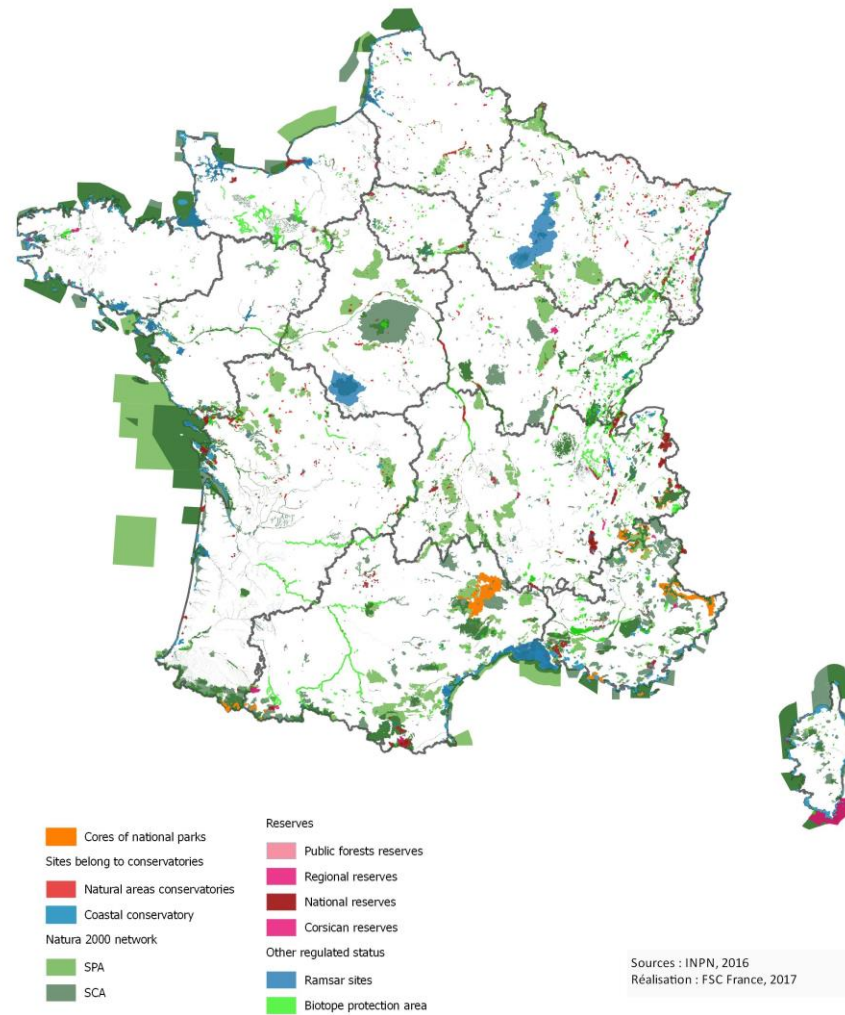


Figure 2: Localization of protected areas that overlap with HCV 1/3.

		<p>From all these regulated status areas, Natura 2000 is probably the one with the less strict status. The last Natura 2000 evaluation study (Bensettiti & Puissauve, 2015) highlights that 76% of Special Protection Areas (SPA) and Special Areas of Conservation (SAC) are covered by a management plan. Forest management measures could be more precise to take into account HCV 1 & 3, but it is already a very good factor to mitigate risks.</p> <p>Pressures identified in 2015 at national scale (Bensettiti & Puissauve, 2015) are: modifications of hydraulic conditions, pollutions, agriculture, forest management, mining operations, transport infrastructure, urbanization, human perturbations, invasive species, perturbation of natural process, natural disturbances and climate change.</p> <p>The most common types of pressures and threats originating from forest management operations include:</p> <ul style="list-style-type: none"> - Plantations management activities, - Changes in hydraulic conditions, - Forest fires and management activities related to fire prevention, especially in the Mediterranean region. <p>Other pressures and threats on forest habitats are also mentioned, including: urbanization, mining and quarrying, invasive exotic species, and the natural dynamic of ecosystems.</p> <p>The assessment is globally rather positive for forest ecosystems. France is the third largest country in Europe for the area of forest ecosystems. Their state seems globally preserved, with a third of ecosystems in a favorable state and only 18% qualified by the study to be in a state 'unfavorable-bad'. The most negatively impacted forest ecosystems are essentially alluvial forests, peat bogs, but also, in the Mediterranean region, deciduous forests (poplar forest, chestnut groves, Tauzin Oak forests, etc.) and coniferous forests of the Mediterranean mountains. The species subservient to forest ecosystems are in relatively good state of conservation, including the terrestrial mammals that constitute the best preserved taxonomic group (Chamois, Wolf, Lynx, Beaver, Marten, Genette and Forest Cat, as well as many bats).</p> <p>All the regulated status areas listed above can therefore be considered as well managed and protected. The analysis of 1.9, 1.10 and 1.20 of category 1 allows to conclude that these areas can be considered at low risk.</p> <p>Therefore, only the risk faced by type-1 ZNIEFFs, which do not benefit from regulated status, needs to be further assessed.</p> <p>To assess the risk faced by type 1/3 HCVs, an analysis was carried out to discover what conservation measures type-1 ZNIEFFs benefited from nationally, and whether these mechanisms were sufficiently reliable and effective to justify a 'low</p>	
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risk' assessment for type-1 ZNIEFFs. The analysis is summarized below can be found in its entirety in Annex A.
 The following areas were defined as having sufficiently reliable and effective conservation measures (see analysis above and category 1) to justify a "low risk" assessment for type-1 ZNIEFFs located within their boundaries:

1. **Public forests** (owned by the State, municipalities and local authorities, including nature reserves). These forests, managed by the ONF, are covered by a management plan.
2. **Natura 2000 sites** (SPAs and SCAs). These sites are managed by a Natura site 2000 organizer and covered by a DOCOB.
3. **Biotope Protection Orders**. These sites benefit from regulated status.
4. **Nature reserves (RNNs, RNRs), core areas of national parks**. These sites benefit from regulated status, are professionally managed and are covered by a management plan.

A number of forest-located type-1 ZNIEFFs are not covered by one of these conservation mechanisms. It is therefore not possible to directly conclude that the protection measures are sufficiently effective to deal with threats. Some type-1 ZNIEFFs are therefore potentially exposed to a 'specified risk' where forest management is concerned.

Some important characteristics common to several of the series analyzed emerge from this assessment (Table 1).

Table 1. General characteristics of the series assessed

Series	Observations	Risk assessment
1	Very small sites, many of them covered by reliable conservation mechanisms.	Low
2	The vast majority of these ZNIEFFs are not defined as being forest habitats, but as associated habitats: heaths, grassy areas, marshes, ponds, lakes, peat bogs, cliffs, caves, scree, water courses, etc.	Low

		<p>3 Most of these sites are to a large extent covered by reliable conservation mechanisms (in particular Natura 2000 sites – SPAs+SCAs – and public forests managed by the ONF). It is considered that these areas contribute sufficiently to preserving species and habitats characteristic of type-1 ZNIEFFs on a national scale. It should also be remembered that some of the areas classified as being potentially at risk are covered by PSGs, even though unfortunately we do not have this information at our disposal, which would otherwise enable us to classify these areas as 'low risk' (see assessment for category 1). Low</p> <p>4 The 12 sites listed are in situations identical to those in series 3. 20 large type-1 ZNIEFFs not protected by reliable conservation mechanisms are located in the Ariège department. This special case is enlarged below and in the annex. Low</p>		
<p>Concerning, Ariège department:</p> <ul style="list-style-type: none"> - Firstly, analysis of the ZNIEFF information sheets revealed relatively few determining species or habitats which presented a high degree of sensitivity to forest management. The risk of HCVs being destroyed as a result of felling is therefore reduced. - Secondly, we studied the structure of forest ownership. 71% of all forests in the Ariège are in private hands, and they are highly fragmented: 93 % of properties in private ownership are smaller than 4 hectares (Annex A, annex 5, Figure 2). Moreover, only 18 % of the increase/new growth is harvested each year. As management pressure is not very high, these characteristics of the local forests are a mitigation factor against the risk of destruction of HCVs. -Finally, we contacted the group studying old forests in the Pyrenees (GEVFP). They told us that very few sub-natural forests have been identified in the Ariège, and most are in publicly owned forests (Annex A, annex 5, Figure 3). Five parcels have been identified in type-1 ZNIEFF 730012112 (Middle valley of the Vicdessos, Pic de Tristagne). They are located to the south of the village of Miglos, on steep slopes 				

		<p>(Annex A, annex 5, Figure 4). The risk of these HCVs being destroyed as a result of forest management is therefore reduced.</p> <p>Threats are specific to concerned species and habitats. It could be:</p> <ul style="list-style-type: none"> • Disturbances of breeding periods, overwintering, nesting, • Destruction of microhabitats or habitats associated with particular stages of the sylvigenetic cycle (in particular the senescence phases), or media associated with the forest environment (ponds, wetlands, clearings, etc.) (Paillet & al., 2015) • Introduction of invasive alien species (UICN, 2015) • Genetic pollution (example of the Salzmann pine, Cambon, 2012), • Construction of roads, roads or improvements related to logging. <p>The conservation mechanisms that exist in Metropolitan France (public forest management plans, PSGs for private forests, networks of protected areas such as the Natura 2000 sites, national parks, nature reserves, biotope protection orders, etc.) are in terms of the national average adequate (refer also to the assessment for category 1, indicators 1.9, 1.10 and 1.20) for the whole of the country territory to be considered 'low risk' for HCV 1 and 3 in the context of this risk assessment for controlled wood.</p> <p>The risk of degradation or destruction of HCV 1 and 3 in Metropolitan France as a result of forest management is low overall.</p> <p>The protection systems in place ensure the effective maintenance of HCVs 1/3 on a national scale.</p>		
<p>3.2 HCV 2</p> <p>Do HCVs of category 2 exist in the area under assessment?</p> <p>Are there HCVs of category 2 that cross regional and/or national boundaries?</p> <p>If yes, is a FSC risk designation available for those areas located outside of national boundaries?</p>	<p>...6 meetings with group experts:</p> <ul style="list-style-type: none"> - 20/05/2016 Lyon (8 experts) - 25/05/2016 Paris (12 experts) - 07/07/2016 Lille (6 experts) - 14/10/2016 Lille (4 experts) - 17/10/2016 Paris (6 experts) - 18/10/2016 Lyon (7 experts) <p>(</p> <p>Results of public consultation</p> <p>Discussions of the SDG</p>	<p>Several areas were considered by the expert groups to define HCV 2 in France, for example:</p> <ul style="list-style-type: none"> - Ecological corridors: However, their definition is not homogenous at national scale, and their designation on the ground is not very relevant in some regions, - Type 2 ZNIEFF (<i>Natural area with interest for fauna and flora</i>) are large areas define for their ecological interest. However, they do not contain "viable populations of the large majority of the naturally occurring species in their natural composition". <p>Even though experts consulted agreed that these areas do not fit the HCV2 definition, there was some level of debate about the opportunity to declare them as HCV2 anyway in order to recognize that these large areas of forest are relatively preserved in view of the average national forest and provide them additional visibility among forest stakeholders. However, given the status they already have, their identification in the national strategy for the creation of protected areas and the impact of HCV2 status on the modification of the management activities, this proposition was finally assessed, by the experts and the SDG as irrelevant.</p>	France	<p>Low risk</p> <p>The following threshold is met:</p> <p>(9) There is no HCV 2 identified and its occurrence is unlikely in the area under assessment</p>

<p>3.3 HCV 3 Which nationally/regionally systematized ecosystems are considered HCV 3? Are there any national/regional protection schemes that can be used for assessing HCV presence and threats to them? Is HCV 3 threatened by forest management activities? Is there progress in achieving Aichi targets in the area under assessment?</p>	<p><u>INPN:</u></p> <ul style="list-style-type: none"> • Protected areas • ZNIEFF • Natura 2000 • Species inventories • Red lists <p>UICN France (2013), Les espaces naturels protégés en France : une pluralité d'outils au service de la conservation de la biodiversité, Paris, 44 pages.</p> <p>Annex A: Risk assessment report for type-1 ZNIEFFs (HCV 1/3)</p> <p>National biodiversity observatory:</p> <ul style="list-style-type: none"> • Factors affected forest biodiversity • Wood harvesting rate <p>IUCN France (2015). Synthesis of the national forum "invasive alien species: towards a reinforcement of strategies for action" - Orleans, 23, 24 and 25 September 2014. Paris, France. 77 pages.</p> <p>Paillet Y., Pernot C., Boulanger V., Debaive N., Fuhr M., Gilg O., Gosselin F., 2015. Quantifying the recovery of old-growth attributes in forest reserves: A first reference for France, Forest Ecology and Management 346, pp 51-64.</p>	<p>In the basis of this elements and other European countries examples, the SDG decided that HCV 2 doesn't exist in France.</p> <p>The SDG and working group of experts gathered to realize the HCV framework decided to place HCV 3 with HCV 1. The analysis for these two categories is therefore the same.</p>	<p>France</p>	<p>Low risk</p> <p>The following threshold is met: (15) HCV 3 is identified and/or its occurrence is likely in the area under assessment, but it is effectively protected from threats caused by management activities,</p>
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<p>3.4 HCV 4</p> <p>Is HCV 4 present in the area under assessment?</p> <p>Are there forest areas present in the region that are critical for mediating flooding or controlling stream flow regulation and water quality?</p> <p>Are there effective management tools and/or regulations capable of ensuring that these forest areas can continue to perform their functions?</p> <p>Is HCV 4 threatened by forest management activities?</p>	<p>Description of protection forest status</p> <p>Legal sheet about protection forest</p> <p>Agriculture ministry, 2017, List of protection forests in France</p> <p>Law of April 28th 1922 related to protected forests</p> <p>Order of August 2nd 1923 related to application conditions of the Law of April 28th 1922 related to protected forests</p> <p>Order of June 27th 1949 related to the modification of Article 4 of the Law of April 28th 1922 related to protected forests</p> <p>Order of January 25th 1979 revised Forest code</p> <p>IRSTEA, 2010. Environmental law about protection forests, Forgeco project, sheet 13.</p> <p>List of French protection forests</p>	<p>HCV 4 occurrence</p> <p>HCV 4 are defined as Protection forests (other than peri-urban) subject to regulation. Regulated protection forests are defined as: “forests of which conservation will be recognized as required for the maintenance of soils in mountains, or on slopes and defense against avalanches, as well as the fight against erosions and invasion of waters and sands.”</p> <p>Approximately 84 000 ha are classified as protection forests for maintenance of ecosystem services, close to 75% being located in mountain areas, close to 20% in coastal forest and the rest in riparian forests.</p> <p>When classified under the ‘protection forest’ status, forests – both public and private – are subject to a specific regulation. Clearing is forbidden as well as any installation of infrastructure. This status also controls the public access and motor vehicles traffic.</p> <p>These forests can be harvested but only with the objective of preserving critical ecosystem services they provide: maintaining and protecting soils, mitigating the damage associated with climatic events (storms, floods, avalanches, fires). Silvicultural activities are therefore adapted to these objectives. For public forests the administrative process to authorize a management plan remains unchanged and the management plan takes into account the measures needed to protect the ecosystem services. However private foresters need to seek a special administrative process to obtain a harvesting authorization from the Departmental authorities (prefect), which ensures that the management activities are in line with the protection of the ecosystem services.</p> <p>Threat assessment</p> <p>Threats to protection forests are only related to natural hazards, which could be magnified by human actions: storms, fires, avalanches, landslides, floods. However, the ‘protection forest’ legal status is particularly strict in France and infractions to this status are punished severely (see the references to the texts of laws in the column "sources"). For example, any infraction committed by the forest owner is considered as an infraction committed on a third-party property (IRSTEA, 2010).</p> <p>No external assessment of the effectiveness of this status exists, however, the CW-WG considers that there is sufficient evidence to conclude in consensus that HCV 4 are subject to a specific regulation which ensures a reliable and effective conservation mechanism (cf. assessment for category 1). Therefore, no threats have been identified for this indicator.</p>	<p>France</p>	<p>Low risk</p> <p>The following thresholds are met:</p> <p>(20) There is low/negligible threat to HCV 4 caused by management activities in the area under assessment;</p>
<p>3.5 HCV 5</p> <p>Is HCV 5 present in the area under assessment?</p>	<p>Water law of January 3rd 1992 Article L-1321-2 of public health code</p> <p>Law Grenelle 1</p>	<p>HCV 5 occurrence</p> <p>HCV 5 are defined as Immediate and proximate water catchment protection area subject to regulation.</p>	<p>France</p>	<p>Low risk</p>

<p>Is HCV 5 threatened by forest management activities?</p>	<p>Eaufrance (public website dedicated to information on water issues) Ministry of Health, 2008. Protection of water catchments, stakeholders and strategies. 84p. Priority water catchments cartography ARS – Inspection and control missions of the Regional Health Agency Water catchment areas – Online resources center for stakeholders involved in water catchments management and protection ONEMA (Water police) – Protection perimeters and water catchment areas) ONEMA (Water police) – Diffuse pollutions CRPF, 2011 – Recommendations for water catchments in forest areas - Practical guide. 90 p.</p>	<p>The French law defines several perimeters around water catchment areas, with different degrees of protection. Both immediate and proximity protection perimeters are classified as HCV-5.</p> <p>Those two perimeters are defined as follows (Article L-1321-2 of public health code and Eaufrance – public website dedicated to information on water issues):</p> <p>Perimeter of immediate protection area are defined as: “<i>site of catchment closed, belonging to a public authority, in the majority of the cases. All activities are prohibited except those relating to the operation and maintenance of the water collection structure and the perimeter itself. Its objective is to prevent the deterioration of the structures and to avoid the discharge of polluting substances in the immediate vicinity of the catchment.</i>”</p> <p>Perimeter of proximity protection area are defined as: “<i>larger area (generally a few hectares) for which any activity likely to cause pollution is prohibited or is subject to specific prescription (construction, deposits, discharges ...)</i>”.</p> <p>The municipalities are in charge of conducting the hydrological and/or hydrogeological studies needed to define the different perimeters and the adequate specific prescriptions. This procedure is controlled by the Regional Health Agency (ONEMA (Water police) – Protection perimeters and water catchment areas).</p> <p>Water catchment areas are distributed over the entire territory and are found both in forested and non-forested areas. The map of all water catchment is not publicly available due to health and security issues. Foresters have to send a request:</p> <ul style="list-style-type: none"> - to the municipality or to the Regional Health Agency (ARS – Inspection and control missions of the Regional Health Agency) to identify the water catchments present in their forests - the municipality shall as well give to the forest manager the specific prescriptions they have to follow. <p>Assessment of threats</p> <p>The main threat to the water catchment areas originate in the diffuse contamination through pesticides and other polluting agents (nitrates, phosphates) (ONEMA – Diffuse pollutions). A strategy has been defined in 2008 and priority water catchments have been identified (cartography). Although a precise positioning of those priority water catchments according to the land-use is not possible due to the unavailability of a public localization, it appears clearly through the actions taken and documents produced that the strategy defined focus on agriculture areas (Online resources center for stakeholders involved in water catchments management and protection).</p> <p>Threats originating from forest management activities can be related to soil perturbation leading to an increased turbidity of waters, accidental oils’ spills and contamination through pesticides and other agrochemical products (CRPF, 2011). Those threats can originate through forest roads opening and intensive use,</p>	<p>The following threshold is met:</p> <p>(25) HCV 5 is identified and/or its occurrence is likely in the area under assessment, but it is effectively protected from threats caused by management activities.</p>
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		<p>intensive soil preparation before a plantation and curative pesticides treatment (CRPF, 2011). Those threats are taken into account during the studies leading to the perimeters and prescriptions definition.</p> <p>The legal framework conditions were assessed previously as part of the legality assessment of the centralized national risk assessment and were classified as 'low risk.'</p> <p>HCV 5 is occurring under the area of assessment. However, the protection measures are clearly defined with a procedure that allow for case-by-case prescriptions definition. Specific recommendations exist regarding water catchment protection in forest areas. There is no evidence that the threats originating from forest management activities are not effectively mitigated by the legal protection and control measures.</p> <p>The CW-WG considers there is sufficient evidence to conclude in consensus that type-5 HCVs are subject to specific regulation, which ensures that reliable and effective conservation mechanisms are effectively mitigate (cf. assessment for category 1) .</p>		
<p>3.6 HCV 6 Is HCV 6 present in the area under assessment? Have significant cultural features created intentionally by humans been identified? Are outstanding natural landscapes present that have evolved as a result of social, economic, administrative, and/or religious imperative? Have sufficient buffers been applied for cultural values when needed?</p>	<p>Agriculture ministry, 2017, List of protection forests in France Law of April 28th 1922 related to protected forests Order of August 2nd 1923 related to application conditions of the Law of April 28th 1922 related to protected forests Order of June 27th 1949 related to the modification of Article 4 of the Law of April 28th 1922 related to protected forests Order of January 25th 1979 revised Forest code</p> <p>IRSTEA, 2010. Environmental law about protection forests, Forgeco project, sheet 13.</p> <p>List of French protection forests</p> <p>Description of protection forest status</p>	<p>HCV 6 occurrence HCV 6 are defined as Peri-urban protection forests subject to regulation. These forests are defined as: “<i>Woods and forests located on the outskirts of large agglomerations; or in areas where their maintenance is necessary for the welfare of the population.</i>”</p> <p>Approximately 77 000 ha are classified as protection forests for maintenance of recreative services to urban population, with over 75% being located in the Île-de-France region (around Paris). There other peri-urban protection forests are located almost exclusively in the northern half of the country (Normandie, Grand-Est and Centre regions).</p> <p>When classified under the 'protection forest' status, forests – both public and private – are subject to a specific regulation. Clearing is forbidden as well as any installation of infrastructure. This status also controls the public access and motor vehicles traffic.</p> <p>These forests can be harvested but only with the objective of preserving and ensuring public accessibility. Silvicultural activities are therefore adapted to these objectives. For public forests the administrative process to authorize a management plan remains unchanged and the management plan takes into account the measures needed to ensure public access. However private foresters need to seek a special administrative process to obtain a harvesting authorization from the Departmental authorities (prefect), which ensures that the management activities are in line with public accessibility requirements.</p>		<p>Low risk</p> <p>The following thresholds are met: (28) There is low/negligible threat to HCV 6 caused by management activities in the area under assessment;</p>

<p>Is HCV 6 threatened by forest management activities?</p>	<p>Legal sheet about protection forest</p>	<p>Threat assessment</p> <p>The 'protection forest' legal status is particularly strict in France and infractions to this status are punished severely (see the references to the texts of laws in the column "sources"). For example, any infraction committed by the forest owner is considered as an infraction committed on a third-party property (IRSTEA, 2010).</p> <p>No external assessment of the effectiveness of this status exists, however, the CW-WG considers that there is sufficient evidence to conclude in consensus that HCV 6 are subject to a specific regulation which ensures a reliable and effective conservation mechanism (cf. assessment for category 1). Therefore, no threats have been identified for this category.</p>		
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Control measures

N/A

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 Forest Code Art. L124-6 Forest Code Art. L341-1 à L341-10 et R-341-1 à R341-9. Art. L261-12 Instruction technique DGPE/SDFCB/2017-712 29/08/2017Rural code L123-21</p> <p>Government sources Conseil supérieur de la forêt et du bois, Programme national de la forêt et du bois 2016-2026, Projet présenté au Conseil supérieur de la forêt et du bois le 8 mars 2016, MAAF, 59 p. Landscape and land-use, agriculture and forest planning, 2010. MAAPRAT/DGPAAT/Bureau du foncier et de la biodiversité, 76 p. Results of the annual statistic study MAA/IRSTEA on the sales of forest plants for the plantation period 2016-2017 - Report of the Ministry of Agriculture services (DGPE/SDFCB/2018-209 du 19 mars 2018):</p> <p>Non-government sources IGN, 2015. Indicators of sustainable management, 343 pages. IGN, 2017, National Forest Inventory Memento, 32 p. FAO, 2016. Global assessment of forest resources National geographic institute</p>	France	<p>1. Estimate of significant net losses of forest to non-forest uses in France Assessment based on legality <i>Content of the law</i> On the obligation to reforest after clear-cutting: Forest Code Art. L124-6 Concerning the definition of clearing land (<i>défrichement</i>) and the conditions in which it is possible to obtain an authorization for forest conversion: Forest Code Art. L341-1 à L341-10 et R-341-1 à R341-9. Art. L261-12 for public forests belonging to local authorities The Prefect of the Department (Préfet du département) is the competent authority who deals with special applications for permission for forest conversion. The French Forest Code states that "<i>no one can exercise the right to clear woods and forests without prior authorization</i>" (Art. L341-3). The Forest Code clearly outlines procedures for obtaining authorization and the conditions under which authorization can be refused. The law implementation is detailed in a "Technical instruction": Instruction technique DGPE/SDFCB/2017-712 29/08/2017</p> <p>The following operations are not regarded as forest clearance:</p> <ul style="list-style-type: none"> • the rehabilitation of former farming, grazing or Alpine-pasture lands invaded by vegetation (garrigue, heathland and maquis), • work to clear walnut groves, olive groves, truffle oak plantations and sweet chestnut orchards, • clearance of short-rotation, normally maintained and harvested coppices established on former agricultural land within the last 30 years, • clearances to create essential facilities within forests (roads, tracks, water points, etc.), • the indirect consequences of operations involving easements for the public good (energy distribution, for example), • mandatory clearing of ground cover in areas at risk from fires. • maintenance or restauration of natural habitats (e.g. Natura 2000 priority habitats). <p>Clearance operations do not require authorization in:</p> <ul style="list-style-type: none"> • isolated woods of an area below a threshold ranging from 0.5 to 4 hectares, as set by the departmental authorities, • some municipal forests, • enclosed parks or gardens of less than 10 hectares belonging to a place of residence, • areas in which the reconstitution of woodland after clear-cutting is prohibited or regulated, or if the clearance is for agricultural development in the case of a municipal or inter-municipal land-use planning process (According to the Rural code L123-21, this procedure

	<p>Terruti-Lucas survey Neyroumande E., Vallauri D., 2011, Regards sur la politique des forêts en France, WWF France, 40 pages.</p> <p>Website of the Syndicat National des Pépiniéristes Forestiers (national association of forest nurserymen)</p>		<p>aims to redistribute fragmented agriculture and woodland lots between the owners in order to optimize the land use. During this process the municipal or inter-municipal land-use planning committee can propose to change the use of the land from forest to agriculture or vice-versa – this proposition is subject to an authorization of the departmental land-use planning commission. This process includes its own specific compensation measures definition in relation to the landscape functionality and connectivity according to MAAPRAT,2010.,</p> <ul style="list-style-type: none"> • woods on former agricultural lands of less than 30 years old with no spatial limit (given the size and fragmentation of land ownership the areas concerned are similar to the range of 0.5 to 4 hectares mentioned above). <p>A clearance request on an area superior or equal to 25ha (even if fragmented) is always subject to both an impact assessment and a public consultation. This will determine the authorization with compensations measure or refusal of the request. Clearance requests for areas inferior to 0.5ha are not subject neither to impact assessment nor public consultation. Different cases are defined between those two thresholds, mainly subject to case by case decision by the administrative authority.</p> <p>An authorization to clear woodland is always subject to at least one of the following <u>compensations measures</u> (to be implemented within one year):</p> <ul style="list-style-type: none"> • afforestation, reforestation (in both cases with a multiplication coefficient between 1 and 5 of the size of the converted area) or forestry improvement works leading to the optimization of all forest functions (including social and environmental), or the payment of a fee (equivalent to the cost of the fore mentioned works, which goes into a fund dedicated to promoting forestry activities), • restoration of woodland if quarrying has taken place, • civil or biological engineering works with a view to preventing erosion, • works to reduce natural hazards, • and, secondarily, the conservation of woodland reserves on the ground. <p>An authorization to clear woodland may be refused due to the environmental and social role of the woodland concerned, when it is recognized as necessary for:</p> <ul style="list-style-type: none"> • retaining soil on mountains or slopes, • defending the soil from erosion and the overflowing of watercourses, • the existence and/or quality of watercourses, springs and wetlands, • protecting dunes and coastline against erosion by the sea and sand invasion, • national defense, • public health, • making the best use of forest resources, when woodland has benefited from public subsidies for planting or improving stands of timber,
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- the biological equilibrium of an area in terms of species or ecosystem preservation, or the well-being of the local population,
- protecting people and property against natural hazards (e.g. fires, avalanches).

Assessment based on spatial data

Changes in forest cover

There has been no significant loss of natural forests and other natural wooded areas in France. In Metropolitan France, the forested area has been increasing by 0.7 % per annum since 1980. The principal reasons for this large increase are, among other things, the abandonment of farmland and the afforestation of what was agricultural land, and, to a lesser extent, changes in climate that encourage the growth and productivity of trees ([IGN, 2017](#)).

The largest increases, in relative terms, have been around the Mediterranean and in Brittany. In traditional forestry areas, such as the North-East and the Landes massif, the increase has been less pronounced. This is also true of the Paris region, due to the pressure of urban growth ([IGN, 2017](#)).

The FAO's [global assessment of forest resources](#) (2016) ranked France among the ten countries showing the largest net annual gain in forest area over the last twenty years. The French forest area increased steadily between 1990 and 2015 (page 10 of the document referred to above).

According to the [Terruti-Lucas survey](#) of changes in land use between 2006 and 2010, there had been no decrease in woodland areas in France.

It has to be mentioned that even though positive, this tendency is more nuanced over the last years, especially in regions impacted by growth of urban area and punctual increase of some agricultural activities. This evolution will be monitored in prevision of the next revision.

2. Estimate of significant net losses of natural forests to plantations in France

Our national definition of natural forests (semi-natural forests) and plantations (cultivated forests) are not official definitions in France. We also need to use indirect indicators to analyse the conversion of natural forests to plantations.

Analysis of national forestry policy- Forest and Timber Programme (PNFB), draft presented to the Conseil Supérieur de la Forêt et du Bois on 8 March 2016

The PNFB adopted in 2016 lays down four main objectives:

1. To increase the quantities of timber harvested in France, while ensuring that forests are renewed (an additional 12 million cubic meters of timber mobilized by 2026).
2. To fulfil citizens' expectations where forests are concerned.
3. To take climate change into account.
4. To find outlets for products from French forests and adapt forest management to market needs.

Objectives 1, 3 and 4 might raise fears of a strong tendency to convert semi-natural forests to cultivated forests.

However, this shift in public policy for the coming decade still has to be translated into reality on the ground, particularly in the regional context (Regional Forest and Timber Programmes - Programmes Régionaux Forêt-Bois / PRFB). Moreover, adequate funding has to be mobilized if the

recommended changes are to be put into effect. It is this concrete implementation that will determine which stands are affected by these measures. Some of them are poor-quality stands of little ecological interest, regarded as “cultivated forests” according to the definition established by FSC France. Where mature forests are concerned, a degree of vigilance is called for.

Analysis of national forestry policy- Public statistics for the forest plant market

The number of forest plants sold per annum has fallen steeply over the last 20 years (Figure 3, taken from the [SNPF website](#)). The species planted which account for more than 100,000 hectares are, in decreasing order by area, the maritime pine, the Douglas fir, the spruce, the cultivated poplar and the Corsican pine.

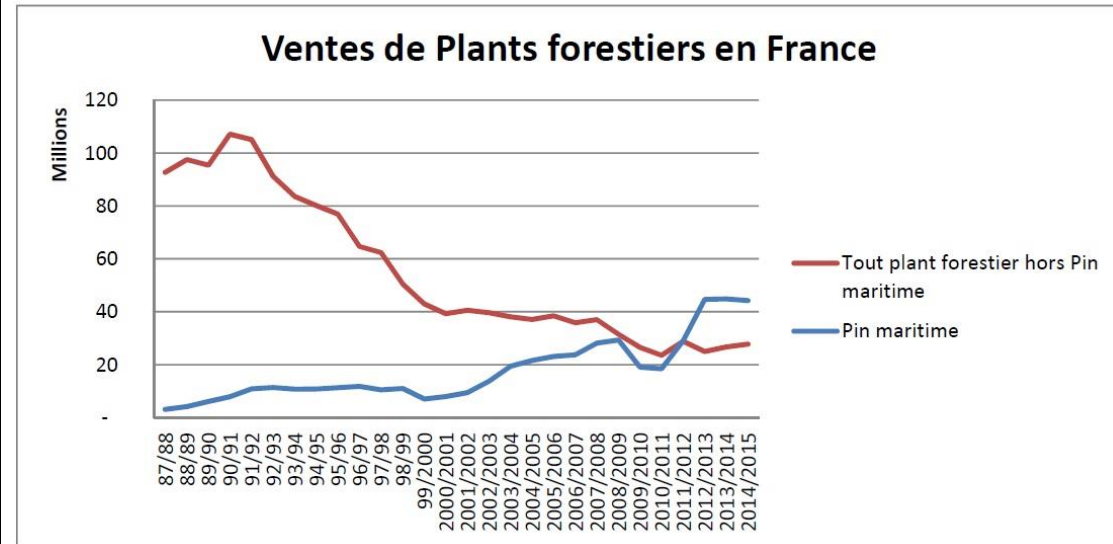


Figure 3. Changes in the number of forest plants marketed between 1987 and 2015

The most recent national analysis of plant sales (carried out by the [IRSTEA](#), 2017 on behalf of the Ministry of Agriculture) provides a detailed picture of the situation and changes in national market sales. A total of 73.5 million plants were sold in 2015-16, representing an increase of 2% on the figure for 2014-15 (Figure 4).

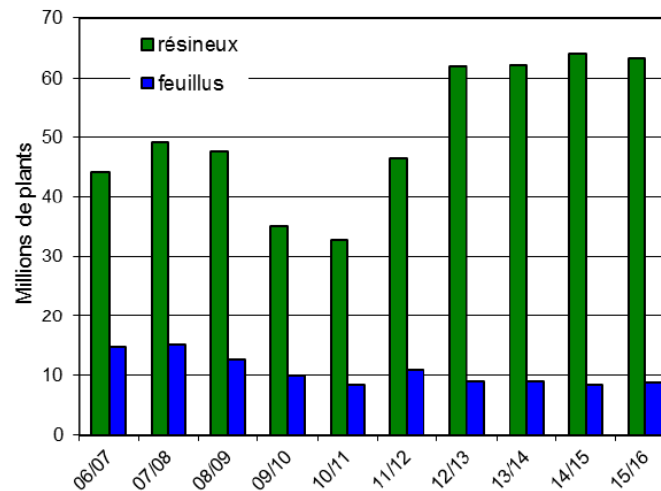


Figure 4. Production of broad-leaved forest plants and conifers sold between 2006 and 2016

French sales of conifers are stable, accounting for 87 % of the total (the maritime pine alone accounts for 56% of all forest plant sales). Sales of Douglas fir have increased by 25%, the common spruce by 1%, the incense pine by 55%, the Scots pine by 15% and the hybrid larch by 45%. Sales of broad-leaved plants increased by 11%, those of poplar saplings by 17% over the same period. This figure is nevertheless lower than the average for the previous ten years. The main broad-leaved tree species showed an upward trend: sessile oak (+14%), common beech (+13%), pedunculated oak (+12%). Sales of false acacia saplings increased by 21%. It should be noted that some of these saplings were planted to renew existing plantations. This is certainly the case of the maritime pine, and of some conifer species.

From these statistics, it is possible to estimate the area planted with trees:

- Conifers are planted at a density of 1,200-1,250 plants per hectare.
- Broad-leaved species, in particular the more valuable ones, at a density of 1,600 per hectare.

From the 73.5 million plants sold, a certain number can be deducted, e.g. all plants of native species at national level, as they are not involved in the conversion of natural forests into plantations.

The non-native species (locally and nationally) are mostly planted in cultivated forests as defined by the FSC. Therefore, while the area of these species is stable nationally, it is reasonable to assume that semi-natural forests are not being converted into cultivated forests, but rather that trees are being planted to artificially regenerate cultivated forests. The areas of all the non-native species were stable over the period 2006-2012

Assessment based on spatial data

Changes in the areas of stands resulting from artificial afforestation and regeneration

The IGN's sustainable management indicator 4.2 (IGD, 2015) provides information on the origins of existing stands by ownership category and ecological region: 1) natural expansion and regeneration, 2) artificial afforestation and regeneration, 3) coppicing.

Indicator 4.2.c gives an idea of the areas which, each year: 1) are regenerated or become forest in a natural way, 2) are regenerated or become forest artificially.

As indicated in the previous section, there are significant regional disparities (Figures 5 and 6).

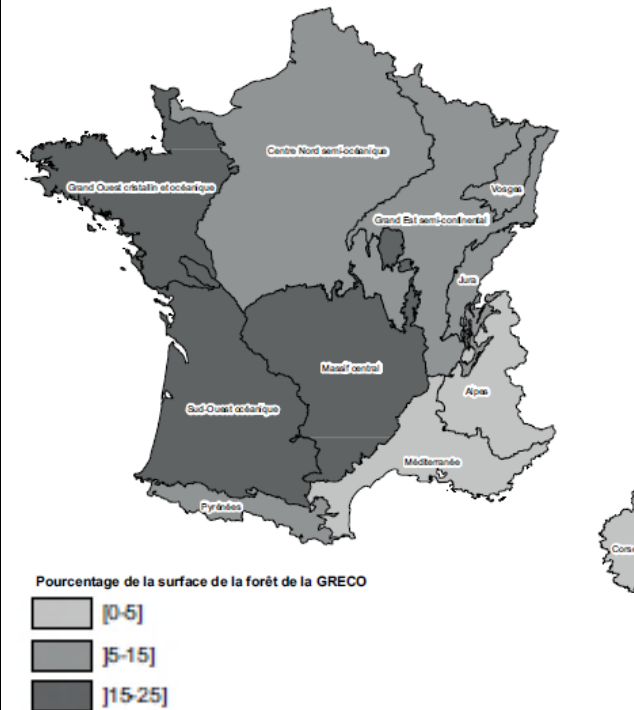


Figure 5. Artificial afforestation and regeneration by ecological region (IGD, 2015)

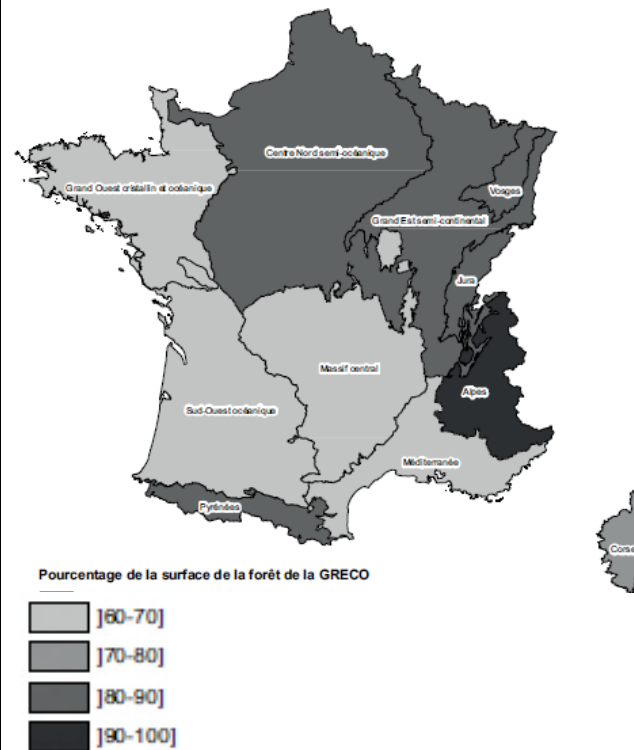


Figure 6. Natural expansion and regeneration by ecological region (IGD, 2015)

The eco-region showing the largest increase in artificially regenerated forests is the Oceanic South-West: this region is mainly covered with plantations of maritime pine, none of which qualify as conversions according to the FSC definition. These final data reinforce the point concerning the low risk of natural forests being converted to plantations on a nationwide basis.

Is the law enforced?

The conversion of natural forests to non-forest uses is tightly regulated under French law and law is applied in France ([Forest Code Art. L124-6](#), see also [indicator 1.1 from Category 1](#)).

Is it possible to conclude that the spatial threshold can be met by assessing the enforcement of legislation?

No, the applicable legislation is not sufficient to assess this indicator with the legally-based thresholds, because even though conversion is strictly regulated and always subject to compensation, the modalities for compensation include measures – e.g. the possibility to pay a fee

		<p>instead of conducting afforesting or reforesting activities - that might not directly ensure that the spatial thresholds are not exceeded.</p> <p><i>Is it possible to conclude that the spatial threshold (0.02% or 5000 ha) is met?</i></p> <p>Yes. The assessment based on spatial data has confirmed that in Metropolitan France, the forested area has been increasing by 0.7 % per annum since 1980. Even though there are some differences between regions, based on different land-use dynamics, the areas of all the non-native species were stable over the period 2006-2012, as well as the sales of forest plants (including exotic species): the risk of semi-natural forests being converted into cultivated forest is therefore low nationally. The future pressure of conversion from semi-natural forests into cultivated forests is not known. As it stands, the PNFB could lead to an upturn in conversion. Nevertheless, the PNFB not yet fully operational in terms of regional implementation or funding, the potential effects it might produce are outside the scope of this assessment. To date, national risk can be considered low. It will nevertheless be revised at the time of the next risk analysis, when the PRFBs are put into effect.</p> <p>Indicator 4.1 is therefore designated as 'low risk'. The following thresholds are met: (1) Thresholds provided in the indicator are not exceeded; AND (3) Other available evidence do not challenge a 'low risk' designation.</p>
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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>Directive 2001/18/CE of the European Parliament and Council of 12 March 2001 on the deliberate release into the environment of genetically modified organisms, abrogating Council Directive 90/220/CEE - Commission Declaration [see the amendment(s)].</p> <p>Forest Code</p> <p>Ministry of Agriculture, web page devoted to GMOs</p> <p>Ministry of the Environment, web page devoted to GMOs</p> <p>High Council for Biotechnologies (Haut conseil des biotechnologies)</p> <p>Legifrance</p> <p>Vallauri D., Thomas E., 2008, les arbres forestiers transgéniques, WWF report.</p> <p>What GMOs are authorized in the EU?</p> <p>Public consultation, May 2013 on extension of the specific authorization granted to INRA Orléans for a plantation of genetically modified poplars</p> <p>Article on the termination of an experiment to plant genetically modified poplars</p>	France	<p>Low risk</p> <p><i>(1) GMO use is illegal according to applicable legislation of the area under assessment AND the risk assessment for relevant indicators of Category 1 confirms that applicable legislation is enforced.</i></p> <p>There is no ban on the commercial use of GMO in general, nor on GM trees in particular. There is a regulatory framework at the European level for the cultivation of GMOs. The requirements of this Directive are applied through national law. In France, use of genetically modified plants must be authorized by the Ministry of Agriculture after an assessment of the risks to health and the environment by the High Council of Biotechnology (Haut Conseil des Biotechnologies) and approval by the Ministry of Environment. In addition, there is a process of public consultation. All requests for field experiments are subject to a public consultation on the website www.ogm.gouv.fr, after which the Ministry for Agriculture will decide whether to issue authorizations.</p> <p><i>(2) There is no commercial use of GMO (tree) species in the area under assessment,</i></p> <p>There is no commercial use of GMO trees. The forest department of the National Institute of Research in Agronomy (INRA) of Orléans was granted an authorization for transgenic poplar plantations, but this was strictly limited to research activities (Vallauri D., Thomas E., 2008, <i>Les arbres forestiers transgéniques</i>), and the GMO poplar pilot test came to an end in 13 July 2013.</p> <p>AND</p> <p><i>(3) Other available evidence does not challenge the 'low risk' designation.</i></p> <p>GMO trees are regulated through law, and there are currently no permits issued for either commercial use or research plots in France. The risk of GMO can be considered 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)?	Yes	See Risk assessment
2	Does applicable legislation for the area under assessment include a ban for commercial use of GMO (trees)?	Yes	See Risk assessment
3	Is there evidence of unauthorized use of GM trees?	No	See Risk assessment
4	Is there any commercial use of GM trees in the country or region?	No	See Risk assessment
5	Are there any trials of GM trees in the country or region?	No	See Risk assessment
6	Are licenses required for commercial use of GM trees?	Yes	See Risk assessment
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	See Risk assessment
8	What GM 'species' are used?	N/A	See Risk assessment
9	Can it be clearly determined in which MUs the GM trees are used?	Yes	See Risk assessment

Control measures

N/A

Annex A: Risk Assessment report for type-1 ZNIEFFs (HCV 1/3)

This document presents the results of the risk assessment carried out by FSC France on type-1 ZNIEFFs (HCV 1/3) for the risk designation of Category 3 “Wood from forests where high conservation values are threatened by management activities”. The assessment was performed in several stages.

Stage 1. Definition of the reliable conservation measures justifying a “low risk” assessment

The following areas were defined as having sufficiently reliable and effective conservation measures (see category 1) to justify a “low risk” assessment for type-1 ZNIEFFs located within their boundaries:

5. **Public forests** (owned by the State, municipalities and local authorities, including nature reserves). These forests, managed by the ONF, are covered by a Management Plan.
6. **Natura 2000 sites** (ZSCs and ZPSs). These sites are managed by a Natura site 2000 organizer and covered by a DOCOB.
7. **Biotope Protection Orders**. These sites benefit from regulated status.
8. **Nature reserves (RNNs, RNRs), core areas of national parks**. These sites benefit from regulated status, are professionally managed and are covered by a Management.

A number of forest-located type-1 ZNIEFFs are not covered by one of these conservation mechanisms (Annex 1). It is therefore not possible to directly conclude that the protection measures are sufficiently effective to deal with threats. Some type-1 ZNIEFFs are therefore potentially exposed to a “specified risk” where forest management is concerned.

Stage 2. Sampling of type-1 ZNIEFFs presenting a potential specified risk

These type-1 ZNIEFFs were sampled to assess whether the potential risk was “low” or “specified”. The aim was to answer the following questions:

- For what species/habitats were these type-1 ZNIEFFs established?
- Are these species/habitats sensitive to forest management?
- Is the identified risk frequent or substantial enough to justify a “specified risk” assessment?
- If yes, on what scale? What is the intensity of the risk?

The assessment concerned 10,009 type-1 ZNIEFFs with a total forest area of 2.7 million hectares, 1.2 million of which were outside zones identified as being covered by reliable conservation mechanisms. 43 % of the forests located in type-1 ZNIEFFs are not covered by a reliable conservation mechanism.

The sampling plan was based on two factors (Annexes 2 and 3):

- The surface area of the HCV zone (4 subcategories)
- The proportion of the zone not covered by a reliable conservation measure as presented in stage 1 (3 subcategories)

The thresholds for the different categories (Table 2) were chosen taking into account the distribution of the data and the intensity of the potential risk.

Table 2. Definition of thresholds for the HCV zone and for the proportion of the HCV zone not covered by a reliable conservation measure

Threshold	Justification for the threshold
< 50 ha	An initial rapid assessment revealed that type-1 ZNIEFFs within which the afforested area not covered by a reliable conservation mechanism was less than 50 hectares had mostly been designated on account of non-forest determining species and habitats (open environments such as heaths and grassland, wetland environments such as streams and ponds, or rocky environments such as cliffs and caves). The risk of forest management having an impact on

	them was therefore low and these sites were excluded from a systematic detailed assessment. Eleven sites were nonetheless assessed in a detailed way.
> 3 000 ha	These sites were considered as a category in their own right on account of their large surface area (and therefore higher potential risk).
15 %	We reckoned the risk for this category to be low because of the presence of reliable conservation measures on the remaining 85% (Natura 2000 sites, nature reserves, public forests, etc.) - measures which ensure the conservation of determining species/habitats over the type-1 ZNIEFF as a whole.
95 %	This was the critical threshold set for afforested type-1 ZNIEFFs not covered to any significant extent by a reliable conservation measure.

The principles adopted and the sampling rates are summarized in Table 3. Sampling pressures were adapted to the scale of each site and the intensity of the risk.

Table 3. Sampling plan for afforested type-1 ZNIEFFs presenting a potential risk

Series	Forest area thresholds for the type-1 ZNIEFF	% of afforested type-1 ZNIEFFs not covered by a reliable conservation measure	Number of type-1 ZNIEFFs concerned (N)	Number of type-1 ZNIEFFs sampled	Area (ha)	Protection rate
A/B/C	< 50 ha	< 15 %/15-95 %/> 95 %	6634	11	490 660	81%
D	51-1 000 ha	< 15 %	178	2	478 650	93%
E	51-1 000 ha	15-95 %	1659	14	788 940	51%
F	51-1 000 ha	> 95 %	1362	12	269 390	1%
G	1 001-3 000 ha	≤ 95 %	107	13	386 450	55%
H	1 001-3 000 ha	> 95 %	31	7	52 260	1%
I	> 3 000 ha	0-100%	32	32	265 650	34%

- Where **series A, B and C** were concerned, we went through the entire list of 6,664 type-1 ZNIEFFs, to gain a global overview of the type of sites concerned. Most are not designated on account of forest-related issues. This was ascertained and validated by assessing a sample of 11 sites.

Examples of the names of type-1 ZNIEFFs belonging to this series: wetland and grassland areas on the banks of the Étang d'Aureilhan, Marais de Goulaine, Rocky coastline and sea cliffs of Capu Cavallu, Chaos dolomitique de Camp-Rouch, Steppe-type slopes on the left bank of the Durance from Font d'Eygliers to l'Argentière, Rocher de Roquebrune, Landes (heathlands) de Coat Liscuis and the Gorges du Doulas, The River Loire and backwaters from Grangent to Balbigny, Wetland and marshy areas of the lower valley of the Eyre, Lac de Grand-Lieu, Étangs de Baleine et de Brule-Doux, Pelouses (meadows) de l'église et du chemin blanc, etc.

- In the case of **series D**, we went through the list of sites and examined two of them. Many sites are in a similar situation: the reliable conservation measures covering 85 % of the HCV can be regarded as sufficiently effective for conserving the whole of the site.
- For **series E and F**, we arrived at a similar finding for most of the 26 ZNIEFFs we assessed. Questions arise with regard to a small number of sites (see examples in Annex 6).
- The sampling pressure was higher for **series H and I**, which present the greatest potential risks.

All the type-1 ZNIEFFs assessed are listed in Annex 4. Examples are given in Annex 6.

Stage 3. Results of the analysis

Some important characteristics common to several of the series analysed emerge from this assessment (Table 4).

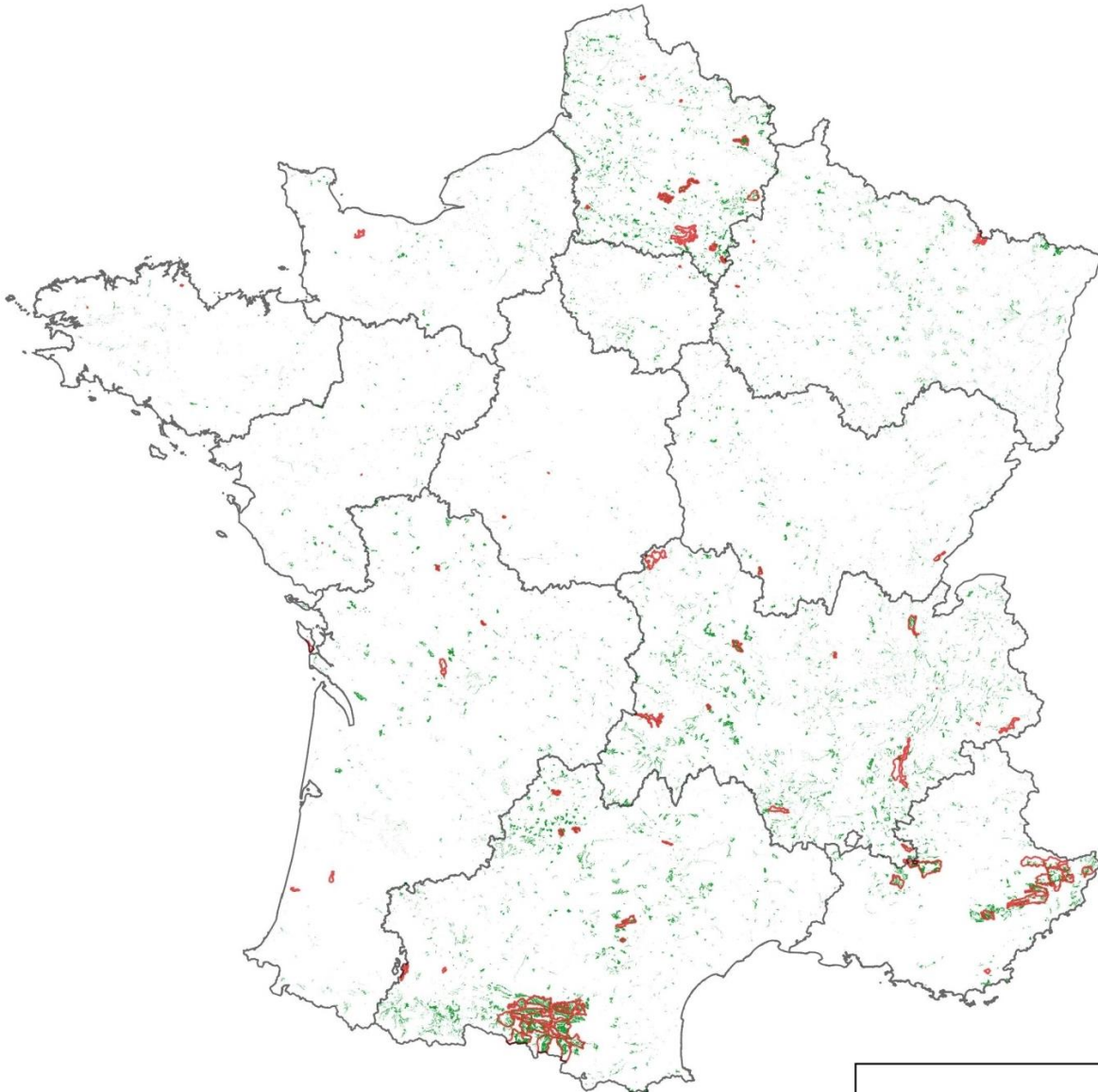
Table 4. General characteristics of the series assessed

Series	Observations	Risk assessment
1	Very small sites, many of them covered by reliable conservation mechanisms.	Low
2	The vast majority of these ZNIEFFs are not defined as being forest habitats, but as associated habitats: heaths, grassy areas, marshes, ponds, lakes, peat bogs, cliffs, caves, scree, water courses, etc.	Low
3	Most of these sites are to a large extent covered by reliable conservation mechanisms (in particular Natura 2000 sites – ZSCs+ZPSs – and public forests managed by the ONF). It is considered that these areas contribute sufficiently to preserving species and habitats characteristic of type-1 ZNIEFFs on a national scale. It should also be remembered that some of the areas classified as being potentially at risk are covered by PSGs, even though unfortunately we do not have this information at our disposal, which would otherwise enable us to classify these areas as “ low risk” (see assessment for category 1).	Low
4	The 12 sites listed are in situations identical to those in series 3. 20 large type-1 ZNIEFFs not protected by reliable conservation mechanisms are located in the Ariège department. This special case is enlarged on in the assessment report.	Low

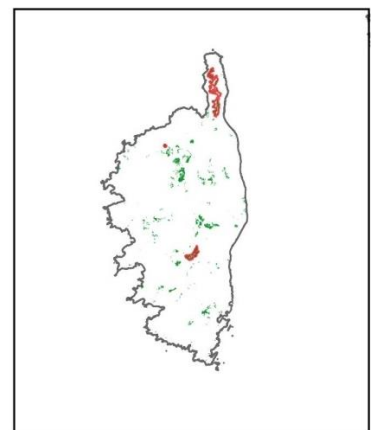
Recommendation for risk designation

Even though locally the issue of the degradation and destruction of some HCVs does arise, the conservation mechanisms that exist in Metropolitan France (public forest management plans, PSGs for private forests, networks of protected areas such as the Natura 2000 sites, national parks, nature reserves, biotope protection orders, etc.) are in terms of the national average adequate (refer also to the assessment for category 1) for the whole of the country territory to be considered “low risk” for category 3 (HCVs) in the context of this risk assessment for controlled wood. The degree of risk will be considered in much greater detail in the Forest Management Standard, which is implemented at Management Unit level.

Annex 1. Location of HCVs presenting potential “specified risk” after stage 1



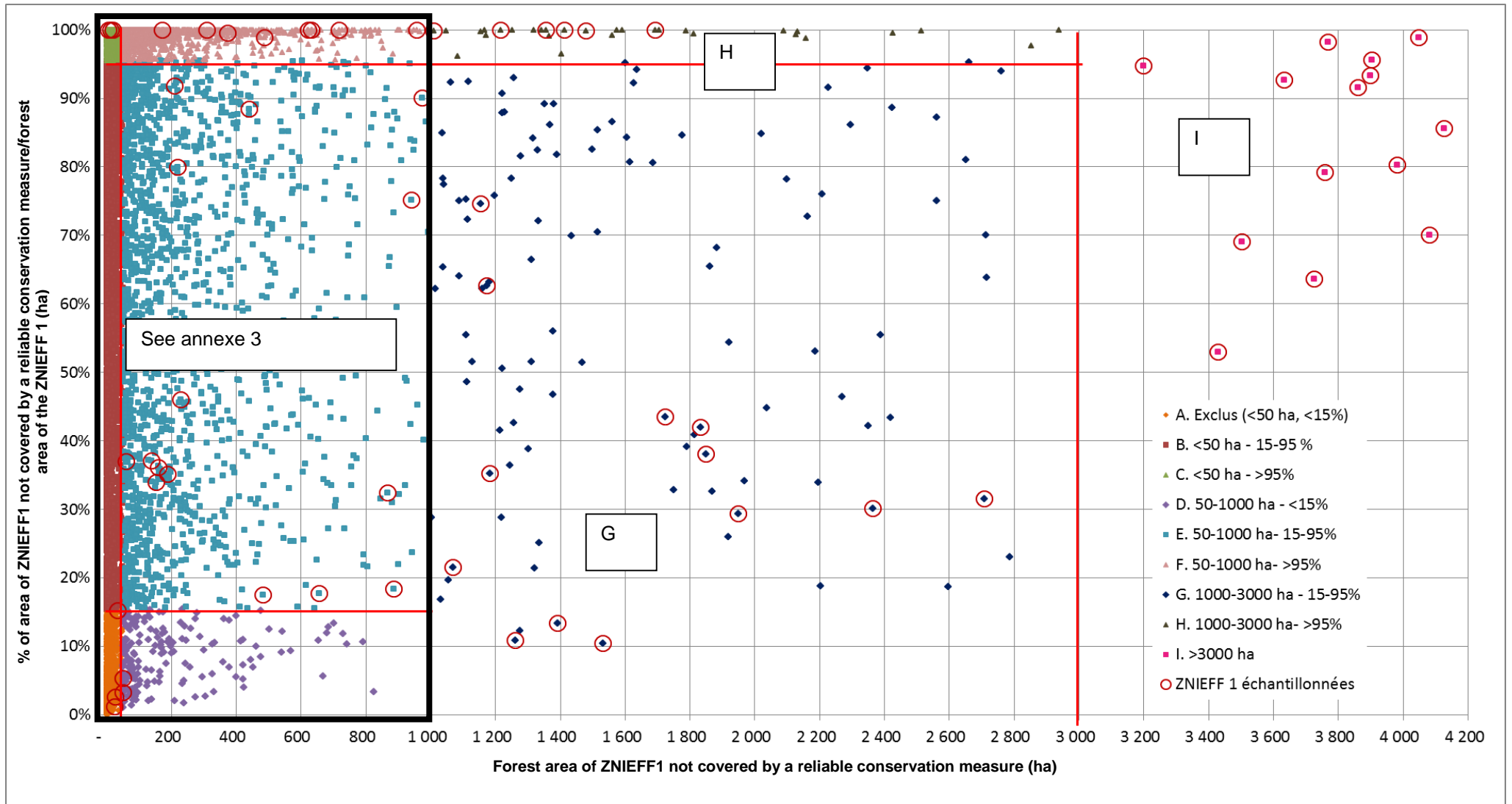
- ZNIEFF 1 sampled for the analysis
- ZNIEFF 1 not covered by a reliable conservation measure (see stage 1)



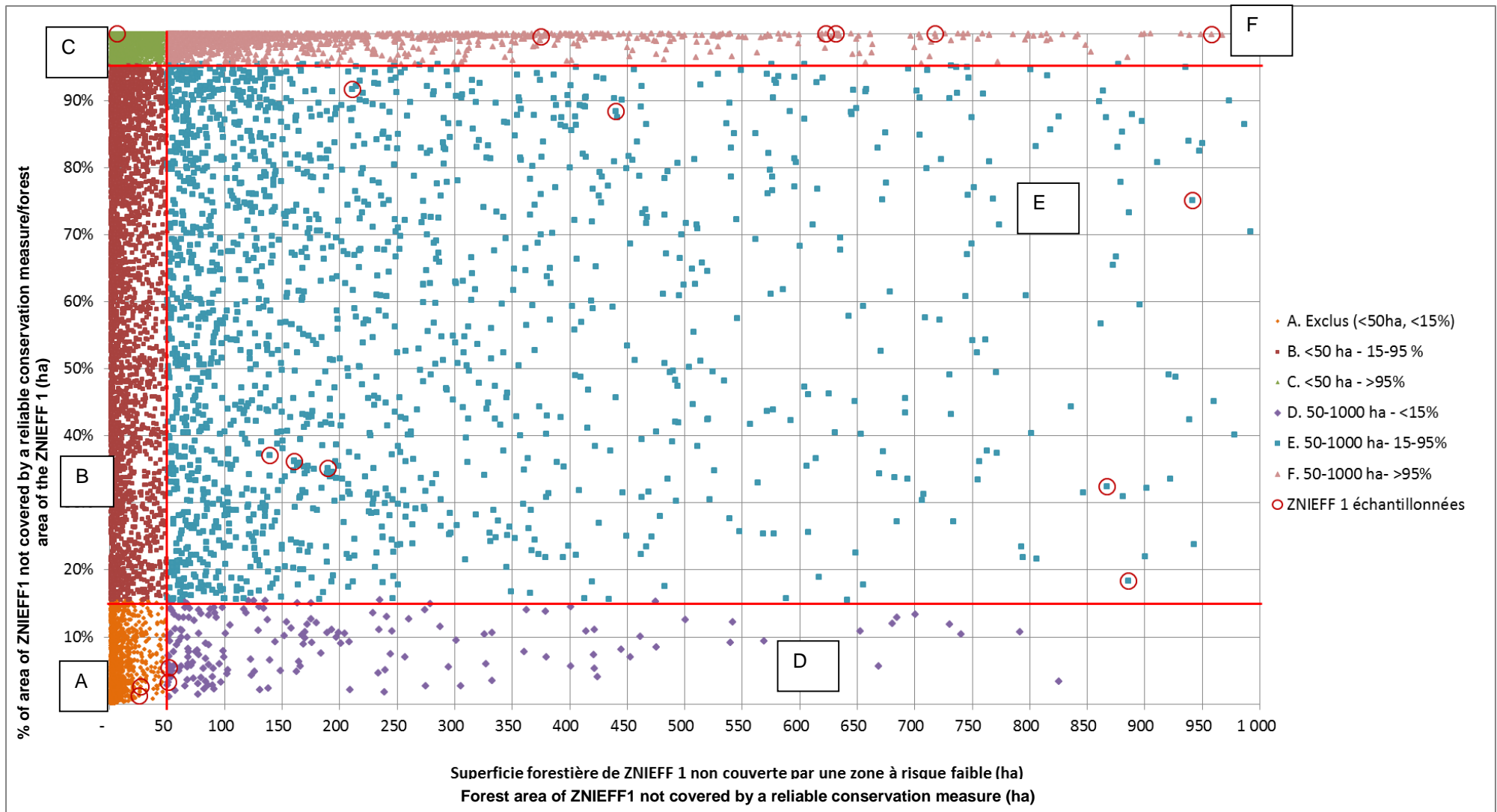
Sources : IGN, 2016
Réalisation : FSC France, 2017

Annex 2. Sampling plan for the data-set

Classification of type-1 ZNIEFFs on the basis of the area of the HCV zone and the proportion of the zone not covered by a reliable conservation mechanism



Annex 3. Close-up of a part of the data-set sampling plan





Classification of type-1 ZNIEFFs on the basis of the area of the HCV zone and the proportion of the zone not covered by a reliable conservation measure

Annex 4. List of the type-1 ZNIEFFs that were assessed

ID MNHN	Name ZNIEFF 1	Area of ZNIEFF1 outside Low risk area	Area of ZNIEFF1	% area outside Low risk area	Series
2500064 68	Foret de cerisy	26	2 197	1%	A
7200009 48	Zones humides et herbiers des rives de l'étang d'aureilhan	33	219	15%	A
9300202 99	Capelude	27	1 043	3%	A
1100201 09	Le bois marcou et le ru choisel	4	4	100%	C
2300310 86	Le bois de la folie	2	2	100%	C
2400310 55	Pelouses, landes et mares des trous	21	21	100%	C
5202200 63	Bois à l'est de saint-lezin	30	30	100%	C
5204200 08	Bois de bayon	2	2	100%	C
5206163 12	Étang bruneau	7	7	100%	C
5300062 95	Roc'h glaz	10	10	100%	C
8200314 86	Marais des chassettes	12	12	100%	C
5400068 39	Foret de saint-trojan	51	1 559	3%	D
7200023 93	Anciennes mines de lignites d'arjuzanx	51	955	5%	D
2100202 01	Étangs et bois de l'homme blanc et des quatre bornes à corfelix et talus-saint-prix	211	230	92%	E
2200135 82	Massif forestier des bois de vigneux, brulé et alentours	974	1 081	90%	E
2200135 86	Bois du chatelet et de romont	440	497	88%	E
2200135 87	Bois des usages de coincy et de la tournelle	941	1 253	75%	E
3100137 44	Bois des dames	161	444	36%	E
4100300 06	Forêts du warndt a saint-avold	483	2 748	18%	E
5400045 53	Foret de la braconne	886	4 814	18%	E
7200009 52	Zones humides de la rive est de l'étang de leon et du ruisseau de la palue	152	449	34%	E
7300114 75	Bois des collines de l'ouest tarbais	867	2 677	32%	E
7300114 77	Forêt de campuzan et lac de puydarrieux	190	541	35%	E
8200304 82	Forêt du tay	230	501	46%	E
8200313 23	Hêtraie de saint julien-mont-denis	60	162	37%	E
8200315 13	Forêts de résineux de l'ubac de la haute maurienne	655	3 686	18%	E
8200319 65	Crêtes des trois pucelles à la grande moucherolle	140	377	37%	E
8200324 36	Tourbières et sapinières de la haute vallée de l'etui	220	276	80%	E
1100011 62	Bois basuel	110	110	100%	F

2100147 82	Le bois de la fosse a sacy	171	171	100%	F
2200137 82	Bois d'avelon et lande de la chapelle-aux-pots	375	377	100%	F
2400062 60	Landes de la foret de sainte jullite	310	310	100%	F
3100137 48	Bassins de brebières et bois du grand marais	120	120	100%	F
5300133 45	Bois de boisgelin	100	100	100%	F
5400033 83	Foret de l'épine	717	717	100%	F
5400156 36	Foret de monette	632	632	100%	F
7300301 79	Bois de lissirou	623	623	100%	F
8200314 03	Pelouses et boisements de l'est des monts d'or	488	493	99%	F
8300079 80	Cotes entre jumeaux et esteil	958	959	100%	F
9400041 91	Chênaie pubescente de poggiola	169	169	100%	F
2200050 37	Massif forestier de retz	1 531	14 565	11%	G
4300205 32	Forêt du mont noir	1 172	1 871	63%	G
8200300 95	Massif du tanargue	1 182	3 351	35%	G
8200304 59	Montagne de chamouse	1 153	1 546	75%	G
8200319 63	Crêtes orientales du massif du Vercors	1 068	4 952	22%	G
8200319 68	Plateaux et bordure occidentale des hauts plateaux du Vercors	1 392	10 416	13%	G
8300001 69	Massif forestier de Tronçais	1 262	11 537	11%	G
9300126 30	Forêt de turini	1 724	3 964	43%	G
9300126 41	Gorges de la roya	1 833	4 360	42%	G
9300126 54	Forêt du boréon - mont la passé - cime de montjoia	1 850	4 851	38%	G
9300126 56	Forêt de la fracha - montagne de l'estrop	2 365	7 834	30%	G
9300126 76	Forêt de duina - mont fracha	2 709	8 574	32%	G
9300201 35	Mont raya - cayre d'archas - mont giraud	1 949	6 628	29%	G
2200134 26	Camp militaire de sissonne	2 237	2 236	100%	H
2600143 69	Bois de la motte et vallee de la tessonne a la motte-saint-jean	1 217	1 217	100%	H
7300100 79	Forêt du puèch du fau et du baile de sarrettes	1 010	1 011	100%	H
7300103 49	Vallées des ruisseaux du bournac et de font d'erbies et combes tributaires	1 412	1 413	100%	H
7300109 90	Montagne de gaïfié et combes des ruisseaux de l'oule et de soubeyre	1 355	1 356	100%	H
7300110 16	Combes de la damette et de gouny et combels tributaires	1 479	1 482	100%	H
9400041 59	Châtaigneraies et chênaies du haut taravo	1 693	1 693	100%	H

2200050 40	Foret du nouvion et ses lisieres	3 904	4 081	96%	I
2200134 22	Forêts de l'antique massif de beine	3 899	4 178	93%	I
2200140 85	Massif de thiescourt/attiche et bois de ricquebourg	3 860	4 215	92%	I
7300030 43	Lac de montbel et partie orientale du bas pays d'olmes	4 049	4 093	99%	I
7300030 61	Parois calcaires et quiès du bassin de tarascon	3 428	6 469	53%	I
7300100 86	Vallée du gijou de lacaze à bézergues et vallée de l'agoût de bézergues à la vergne	3 503	5 069	69%	I
7300118 96	Collines de l'ouest du séronais, du mas-d'azil à saint-lizier	4 300	4 461	96%	I
7300119 10	Massif du pic de certescans	7 487	13 635	55%	I
7300119 23	Massif de tabe - saint-barthélémy	9 554	12 573	76%	I
7300119 72	Rive gauche de la haute vallée de l'ariège	7 183	13 984	51%	I
7300119 74	Massif du crieu	6 758	6 787	100%	I
7300120 27	Massif du pic des trois seigneurs	6 674	10 021	67%	I
7300120 43	Montagnes d'ercé et de massat	4 083	5 824	70%	I
7300120 56	Massif de l'arize, versant nord	7 759	9 529	81%	I
7300120 57	Massif de l'arize, versant sud	4 591	6 509	71%	I
7300120 70	Massif du bouireix et montagnes de sourroque	4 696	10 264	46%	I
7300121 12	Moyenne vallée de vicdessos, pic de tristagne	7 742	12 630	61%	I
7300121 41	Montagnes orientales d'ax-les-thermes	4 857	7 731	63%	I
7300129 03	Massif de l'arize, zone d'altitude	6 441	14 088	46%	I
7300129 05	Le plantaurel : du mas d'azil à l'ariège	10 184	10 576	96%	I
7300140 19	Le plantaurel entre foix et lavelanet	5 942	8 048	74%	I
7300305 27	Coteaux secs, vallons et collines de l'ouest du bas pays d'olmes	3 769	3 837	98%	I
8200306 58	Plateau du retord	3 981	4 963	80%	I
8300055 33	Gorges de la rhue	3 726	5 854	64%	I
8300203 54	Bois noirs, secteur auvergne	3 633	3 922	93%	I
9300126 03	Montagne du cheiron	6 304	13 645	46%	I
9300126 49	Massif du tournaret et du brec d'utelle	7 397	17 263	43%	I
9300126 83	Montagne des miolans - bois de cumi et de saumalonga - forêt de la brasque	4 402	6 361	69%	I
9300127 06	Massif de la montagne de lure	11 297	22 099	51%	I
9300203 35	Hauts plateaux des monts de vaucluse	4 126	4 818	86%	I
9300204 57	Collines d'estelle - bois de siounet et de fayet	3 759	4 746	79%	I



9400040 76	Crêtes asylvatiques du cap corse	3 200	3 379	95%	I
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Annex 5. The special case of the Ariège

The *département* of the Ariège is characterized by a high density of type-1 ZNIEFFs and very limited coverage where reliable conservation mechanisms are concerned (almost no Natura 2000 sites, few publicly owned forests) (Figure 1).

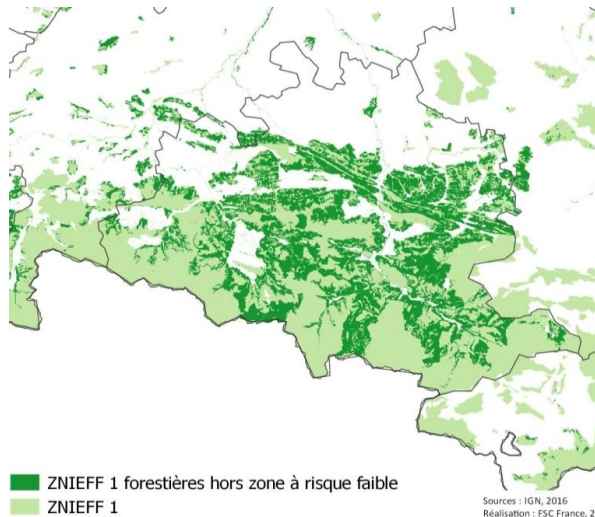


Figure 1. Afforested type-1 ZNIEFFs not covered by a reliable conservation measure (public forest, Natura 2000 site, APPB, nature reserves)

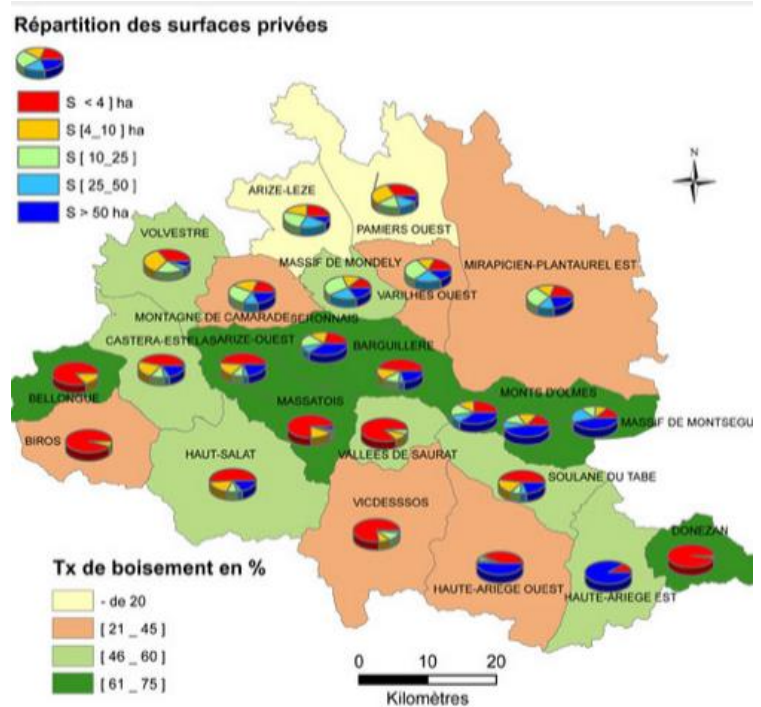


Figure 2. Distribution of land in private ownership in the *département* of the Ariège (Source: [Fédération pastorale de l'Ariège](#))

However, we identified several risk-mitigating factors.

- Firstly, analysis of the ZNIEFF information sheets revealed relatively few determining species or habitats which presented a high degree of sensitivity to forest management. The risk of HCVs being destroyed as a result of felling is therefore reduced.
- Secondly, we studied the structure of forest ownership. 71% of all forests in the Ariège are in private hands, and they are highly fragmented: 93 % of properties in private ownership are smaller than 4 hectares (Figure 2). Moreover, only 18 % of the increase/new growth is harvested each year. As management pressure is not very high, these characteristics of the local forests are a factor mitigating against the risk of destruction of HCVs.
- Finally, we contacted the group studying old forests in the Pyrenees (GEVFP). They told us that very few sub-natural forests have been identified in the Ariège, and most are in publicly owned forests (Figure 3). Five parcels have been identified in type-1 ZNIEFF 730012112 (Middle valley of the Vicdessos, Pic de Tristagne). They are located to the south of the village of Miglos, on steep slopes (Figure 4). The risk of these HCVs being destroyed as a result of forest management is therefore reduced.

The risk of HCVs being threatened in the Ariège department may therefore be regarded as low.

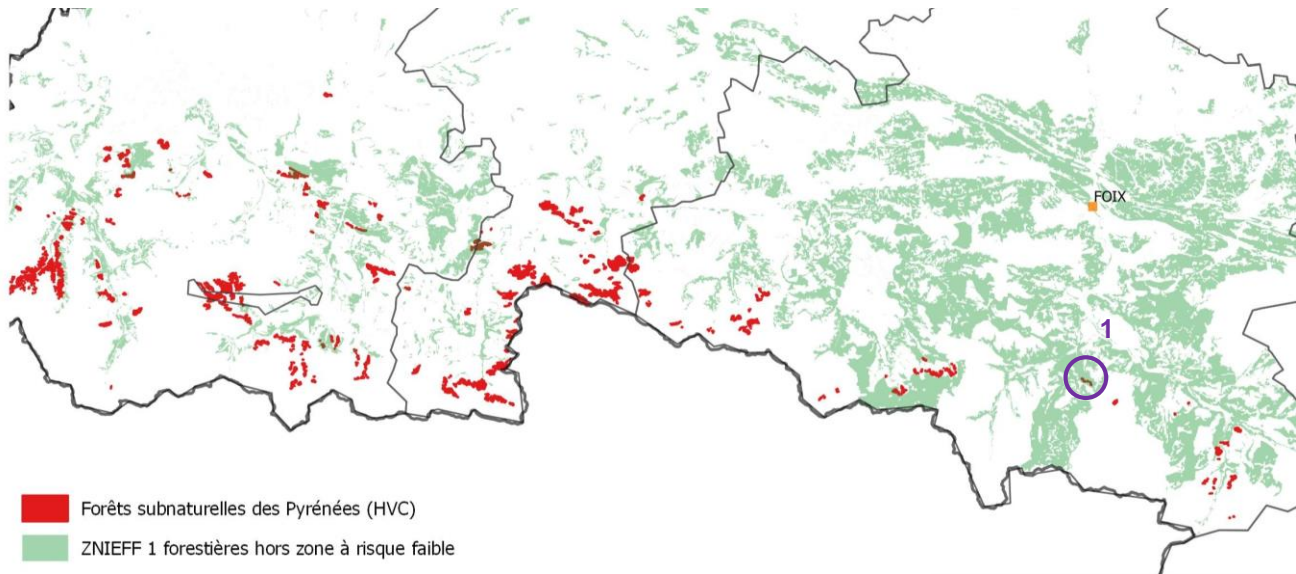


Figure 3. Sub-natural forests identified by the GEVFP in the Pyrenees

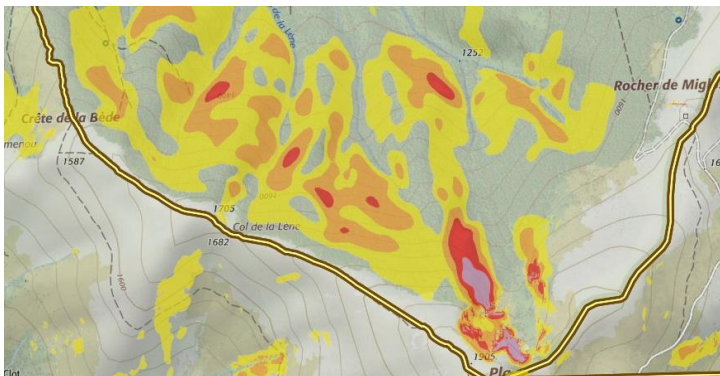


Figure 4. Classification of slopes in the local authority area of Miglos, where sub-natural forests have been identified within the “Moyenne vallée de Vicdessos, Pic de Tristagne” type-1 ZNIEFF (1)

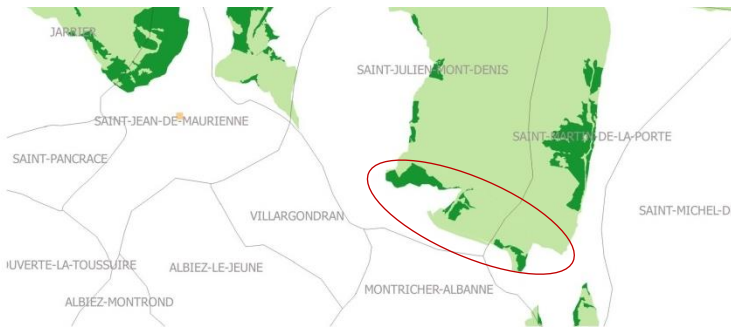
List of type-1 ZNIEFFs larger than 3,000 hectares in the *département* of the Ariège

ID MNHN	Nom ZNIEFF 1	ZNIEFF1 area outside Low risk area	ZNIEFF1 area	% area outside Low risk area
730011 896	Collines de l'ouest du séronais, du mas-d'azil à saint-lizier	4 300	4 461	96%
730030 527	Coteaux secs, vallons et collines de l'ouest du bas pays d'olmes	3 769	3 837	98%
730003 043	Lac de montbel et partie orientale du bas pays d'olmes	4 049	4 093	99%
730012 905	Le plantaurel : du mas d'azil à l'ariège	10 184	10 576	96%
730014 019	Le plantaurel entre foix et lavelanet	5 942	8 048	74%
730012 056	Massif de l'arize, versant nord	7 759	9 529	81%
730012 057	Massif de l'arize, versant sud	4 591	6 509	71%
730012 903	Massif de l'arize, zone d'altitude	6 441	14 088	46%
730011 923	Massif de tabe - saint-barthélémy	9 554	12 573	76%
730012 070	Massif du bouireix et montagnes de sourroque	4 696	10 264	46%

730011 974	Massif du crieu	6 758	6 787	100%
730011 910	Massif du pic de certescans	7 487	13 635	55%
730012 027	Massif du pic des trois seigneurs	6 674	10 021	67%
730012 043	Montagnes d'ercé et de massat	4 083	5 824	70%
730012 141	Montagnes orientales d'ax-les-thermes	4 857	7 731	63%
730012 112	Moyenne vallée de vicdessos, pic de tristagne	7 742	12 630	61%
730003 061	Parois calcaires et quiès du bassin de tarascon	3 428	6 469	53%
730011 972	Rive gauche de la haute vallée de l'ariège	7 183	13 984	51%
730010 086	Vallée du gijou de lacaze à bézergues et vallée de l'agoût de bézergues à la vergne	3 503	5 069	69%

Annex 6. Some examples of the type-1 ZNIEFFs that were assessed

Series F: Beech wood (Hêtraie) of Saint Julien-Mont-Denis (ID 820031323)



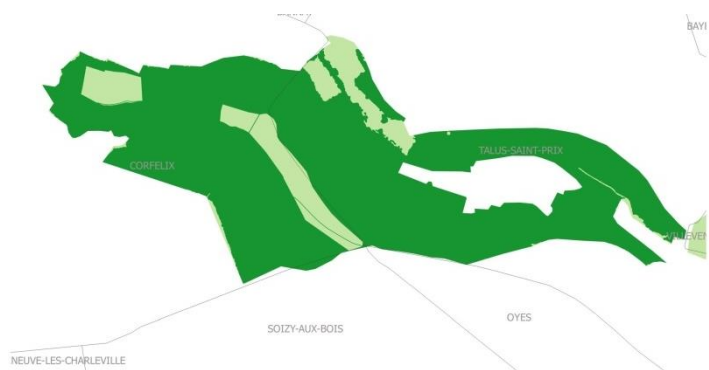
The beech wood of Saint-Julien-Mont-Denis in Savoie raises some serious issues in relation to forestry, having some typically forest species and habitats that are sensitive to forest management: stands of beech on limestone, lady's slipper orchid (see the [ZNIEFF information sheet](#) for more detailed information). However, the afforested part of this type-1 ZNIEFF is 63% covered by reliable conservation measures: Zone de Conservation Spéciale and Zone de Protection Spéciale (Natura 2000), national-estate forest and local-authority forest, which ensure that the identified HCVs are maintained.

Given the average standard of forest management in Savoie, and that conservation issues are well covered by other instruments, the risk relating to the determining species/habitats may be regarded as low.



- ZNIEFF 1 forestières hors zone à risque faible
- ZNIEFF 1
- ZSC/ZPS
- Forêts publiques
- Forêt communale ou des collectivités
- Forêt domaniale

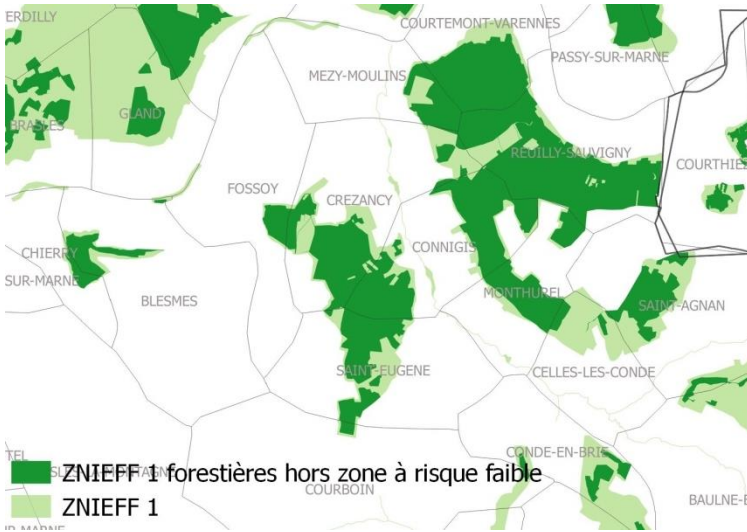
Series E : Étangs et bois (ponds and woodland) de l'Homme Blanc et des Quatre Bornes at Corfelix and Talus-Saint-Prix (ID 210020201)



This ZNIEFF, located in the Marne, consists of a mosaic of wetland and forest environments, most of the species of interest being species associated with wetlands or aquatic environments, or birds of open country (see [ZNIEFF information sheet](#) for more detailed information). Only 8 % of this type-1 ZNIEFF is covered by public forest, but the risk of forest management impacting the forest environments of interest here is low, thanks to the regulations that apply to wetlands and aquatic environments (Laws on Water Resources, Forest Code, etc.).

- ZNIEFF 1 forestières hors zone à risque faible
 - ZNIEFF 1
- Sources : IGN, 2016
Réalisation : FSC France, 2017

Series E: Forest massif of the woodlands of Vigneux, Brulé and surrounding areas (ID 220 013 582)



This massif (located in the Aisne *département* of Picardy) is a mosaic of forest environments, peat bogs and open areas. The presence of black and middle-spotted woodpeckers should be noted, while the other determining species inhabit the open areas or the peat bogs (see the [ZNIEFF information sheet](#) for more detailed information).

No Natura 2000 site had been designated in the vicinity (coverage of the Aisne *département* in this respect is relatively poor) and public forest accounts for only 10 % of this type-1 ZNIEFF. The risk to the peat bogs, although not negligible, is nevertheless low, on account of the regulations governing wetlands and aquatic environments, and current practices in areas of this type. Given the mosaic of environments, it is unlikely that connectivity between the various afforested areas will be broken, which reduces the risk affecting the woodpecker populations. The

management of broad-leaved stands generally practised, even though it may mean the replacement of old trees with younger ones, is not regarded as a serious risk to the population of middle-spotted woodpeckers. The level of risk in this type-1 ZNIEFF may therefore be regarded as low.