



Italian National Risk Assessment Control Measures Guidance after windthrow

Intent of the Document

This document has been released to help companies/Organization sourcing FSC Controlled Wood material in Italy. In October 2018 some Regions were affected by a severe windthrow -Friuli Venezia-Giulia, Veneto, Trentino Alto Adige, Lombardia – compromising a huge amount of material and driving forest managers to apply sanitary felling and other emergency measures.

Italian National Risk assessment ([FSC-NRA-IT V1-0](#)) identify specified risk for Category 1 (Illegal Harvested wood) and Category 3 (Wood from forests in which high conservation values are threatened by management activities). The extreme weather event lead to specific conditions where the mandatory control measures are applicable, but inadequate to mitigate the risks, and the alternate control measures need to be defined as they're suitable for risk mitigation.

As per [FSC-STD-40-005 V3-1](#) Clause 4.13 - *The Organization may replace mandatory control measures provided in the NRA with more effective control measures, under the following conditions:*

- a) The organization demonstrates that control measures provided in the NRA are inadequate to mitigate risk found in the organization's specific operations;*
- b) The organization demonstrates to the certification body that the alternative control measures are sufficient to mitigate the risk, and the certification body approves the alternative control measures; and*
- c) The organization has, after approval by the certification body, forwarded a description of the alternative control measures, and justification for their use, to the body responsible for NRA maintenance (FSC Italy in this case).*

It's for this reason that FSC Italy is guiding and advancing both the Organization and the CBs in order to provide them a clear overview of the actual situation affected by the wind storm to help defining alternative controlled measures. This document is not normative but is intended to be used as guidance document. For all the other situations please refer to the approved [National Risk Assessment](#).



Controlled Measures Category 1: Illegally harvested wood

Indicator	Control measures	Suitability to the context	Alternative Control Measures
<p>1.3 Management and harvesting planning</p>	<p>Mandatory For public forests/collective ownership: 1. Management plan or any equivalent management tool/plan is in place according to regional/local legislation; or 2. Management plan or any equivalent management tool/plan has been at least submitted to public authorities in charge of verification/approval; or has undergone positively public authorities' control. 3. The contents of the operating and harvesting plans shall be consistent with approved forest management plans/ or any equivalent management tool/plan;</p> <p>For private forests: 1. Harvesting plan/any equivalent management tool/plan is in place according to regional/local legislation; or 2. Harvesting plan/any equivalent management tool/plan has been at least submitted to public authorities in charge of verification/approval; or has undergone positively public authorities' control; 3. Field or desk audit shall confirm that information regarding area, species, volumes and other information are correct and corresponds to information within the harvesting plan or to the materials physically received and verified;</p> <p>Recommended 1. Harvesting areas and harvesting restrictions shall be identified in management plan/any equivalent management tool/plan and maps if legally required;</p>	<p>Yes. Management plan is valid and is of high relevance in this case because it can give important information about the FMU (i.e protected species, interesting habitats, growing stocks, ...)</p>	



Indicator	Control measures	Suitability to the context	Alternative Control Measures
	<ol style="list-style-type: none"> 2. Hydrogeological restrictions are mapped and included within the management plan or any alternative management plan/tool; 3. Interviews with local authorities in charge of assessing/approving forest management plans. 		
1.4 Harvesting permits	<p>Mandatory</p> <ol style="list-style-type: none"> 1. Harvesting permits (license or similar legal document governing the harvesting of forest resources) shall exist; or 2. Harvesting plan or any equivalent management tool/plan has been at least submitted to public authorities in charge of verification/approval; or has undergone positively public authorities' control; 3. Field or desk audit shall confirm that information regarding area, species, volumes and other information are correct and corresponds to information within the harvesting plan or to the materials physically received and verified. <p>Recommended</p> <ol style="list-style-type: none"> 1. Authorities shall confirm the validity of harvesting permits/any equivalent management tool/plan; 2. Field inspection shall confirm that harvesting takes place within limits specified in the harvesting plan. 	<p>No.</p> <p>Harvesting permits are suspended due to the emergency. They need to be replaced by specific harvesting communications or other type of licence/permits.</p>	<p>As in this situation, the traditional harvesting permits do not apply, there is need to collect evidences about 'harvesting communications' or any similar documents required to harvest under specific 'emergency conditions'. This communication/declaration need to be approved by the competent authority (in this case an extraordinary body).</p> <p>Possible alternative CMs are: specific harvesting communications or other type of licence/permits; field inspection.</p>
1.6 Value added taxes and other sales taxes	<p>Mandatory</p> <ol style="list-style-type: none"> 1. Sales documents shall include applicable sales taxes (i.e. Value Added Tax); <p>Recommended</p> <ol style="list-style-type: none"> 1. Matching of harvesting permit and sales volume; 2. Operations are up to date in payment of applicable sales taxes (i.e. receipt of payment; direct contact with competent authorities). 	<p>Yes.</p>	



Indicator	Control measures	Suitability to the context	Alternative Control Measures
1.8 Timber harvesting regulations	<p>Mandatory</p> <ol style="list-style-type: none"> Field or desk audit shall confirm that harvesting is conducted within the authorized boundaries of the SU; Field or desk audit shall confirm that harvesting is conducted according to regional/local legislation (i.e. PMPF, Prescrizioni di Massima e Polizia Forestale); Desk audit shall confirm that a final harvesting activities check is conducted (i.e field inspection, report establishing any penalties or compensation). <p>Recommended</p> <ol style="list-style-type: none"> Consultation with officials in charge of performing monitoring activities (i.e. Forestry Police Corps); Consultation with stakeholders that might be affected by negative management impacts (e.g. neighboring owners); Field or desk audit shall confirm that tree species or selected trees found within the SU for which felling is prohibited are listed within the harvesting plans and/or marked in the field. 	<p>No.</p> <p>Harvesting permits are suspended due to the emergency. They need to be replaced by specific harvesting communications or other type of license/permits.</p>	<p>Harvesting is conducted according to 1.4: alternative types of harvesting license/permits. Moreover the quantity of material harvested declared under 1.4 is just a preliminary estimation that need to be confirmed after closing the harvesting sites (surveillance).</p> <p>Possible alternative CMs are: specific harvesting communications or other type of licence/permits; field inspection.</p>
1.9 Protected sites and species	<p>Mandatory</p> <ol style="list-style-type: none"> Field or desk audit shall confirm that all legally protected areas (including species habitats) are included in the management or /any equivalent management tool/plan if required by the legislation; Field or desk audit shall confirm that legal established procedures are followed for surveying, managing and protecting endangered or threatened species within the management unit; Field or desk audit shall confirm that nature protection regulations are followed; such as protected areas, set-aside areas, protected species and hunting. 	<p>No.</p> <p>Environmental impact assessment is suspended due to the emergency. They need to be replaced by specific derogation authorizing harvesting in areas</p>	<p>Harvesting is conducted according to 1.4 alternative types of harvesting license/permits. According to the emergency laws established at National level the operations can take place even in protected areas/protected values after the approval of the harvesting sites and the approval of a derogation of the environmental impact</p>



Indicator	Control measures	Suitability to the context	Alternative Control Measures
	<p>Recommended</p> <ol style="list-style-type: none"> 1. Consultation with authorities in charge of managing protected areas (even nearby the management unit); 2. Consultation with local stakeholders (e.g. environmental NGOs, locals, etc.). 	<p>important for species/habitats.</p>	<p>assessment legally required in these sites.</p> <p>Possible alternative CMs are: specific harvesting communications or other type of licence/permits; harvesting derogation; engagement with experts (as per Annex C, FSC-STD-40-005), stakeholder engagement with local NGOs active in the region, physical verification on site to ensure that timber is not originating from areas where protected sites and species are threatened.</p>
<p>1.10 Environmental requirements</p>	<p>Mandatory</p> <ol style="list-style-type: none"> 1. Environmental impacts assessments shall be in place (or within the approval process) by the legally competent authority if legally required; 2. Field or desk audit shall confirm that requirements for environmental monitoring are enforced and evidences are collected according to the environmental assessment conducted; 3. Field or desk audit shall confirm that environmental restrictions are followed in the field, such as requirements related to soil damage, buffer zones, retention trees, seasonal restrictions etc. <p>Recommended</p> <ol style="list-style-type: none"> 1. Field or desk audit shall confirm that a final harvesting activities check is conducted (i.e. field inspection, report establishing any penalties or compensation); 	<p>No.</p> <p>Environmental impact assessment is suspended due to the emergency. They need to be replaced by specific derogation authorizing harvesting in areas important for species/habitats.</p>	<p>Harvesting is conducted according to 1.4 alternative types of harvesting license/permits. According to the emergency laws established at National level the operations can take place even in protected areas/protected values after the approval of the harvesting sites and the approval of a derogation of the environmental impact assessment legally required in these sites.</p>



Indicator	Control measures	Suitability to the context	Alternative Control Measures
	2. Consultation with local stakeholders (e.g. environmental NGOs, locals, etc.).		Possible alternative CMs are: specific harvesting communications or other type of licence/permits; harvesting derogation; engagement with experts (as per Annex C, FSC-STD-40-005), stakeholder engagement with local NGOs active in the region, physical verification on site to ensure that timber is not originating from areas where environmental values are threatened.
1.11 Health and safety	<p>Mandatory</p> <p>1. Desk audit shall confirm that Occupational health and safety requirements are observed by all personnel involved in harvesting activities. Desk audit include at least: Chamber of Commerce Company registration in accordance with the type of activities performed (in italiano <i>Iscrizione alla Camera di Commercio, industria ed artigianato e Agricoltura con oggetto sociale inerente alla topologia di appalto</i>), technical competence declaration (in italiano <i>dichiarazione di idoneità tecnico-professionale</i>), risk assessment document/report (in italiano <i>Documento di Valutazione dei Rischi</i>), risk assessment document/report from disturbances (<i>Document di Valutazione dei Rischi da Interferenze</i>);</p> <p>Recommended</p> <p>1. Interviews with workers and contractors shall confirm that legally required protection equipment is required/provided by the Organization;</p>	No. Control Measures designed are applicable for National based companies.	<p>In case of a foreign companies control measures need to verify: legal registration of the company (type of activities performed), technical competences; risk assessment documents providing information of all the health and safety practices that need to be implemented by the employees (IPDs).</p> <p>Possible alternative CMs are: field inspection, interview with contractors or workers.</p>



Indicator	Control measures	Suitability to the context	Alternative Control Measures
	2. Interviews with Public Authorities in charge of monitoring health and safety working conditions confirm that applicable legal requirements are met and there are no major non-compliances. 3. Interviews with representatives from relevant Trade Unions confirm that applicable legal requirements are met.		
1.12 Legal employment	<p>Mandatory</p> 1. Desk audit shall confirm that all personnel involved in harvesting activities is covered under a formal contract, including the payment of obligatory insurance and the welfare fund (in italiano <i>contributo previdenziale</i>). Desk audit include at least the assessment of the payment of worker's social security (in italiano <i>Documento di Regolarità Contributiva</i>). <p>Recommended</p> 1. Interviews with staff shall confirm that working conditions meet legal requirements (i.e. type of contract, working conditions, technical competences required, etc.) 2. Interviews with representatives from relevant Labor Unions confirm that working conditions meet applicable legal requirements and there are no substantial conflicts in place.	<p>No. Control Measures designed are applicable for National based companies.</p>	<p>Control Measures designed are applicable for National based companies. In case of a foreign companies control measures need to verify: legal employment practices, prove of the obligatory insurance and social welfare payments.</p> <p>Possible alternative CMs are: field inspection, interview with contractors or workers.</p>
1.21 Legislation requiring due diligence/due care procedures	<p>Mandatory</p> 1. Can the material be tracked back to the entity placing it on the market i.e. the Operator according to Regulation (EU) 995/2010 (EU timber Regulation, EUTR)? - If the timber is sold as standing stock to a logging company, the logging company will be the Operator. - If the timber is sold as an assortment by the forest owner/manager, then the forest owner/manager will be the Operator. If no - do not buy.	<p>Yes.</p>	



Indicator	Control measures	Suitability to the context	Alternative Control Measures
	<p>If yes - go to 2</p> <p>2. Can the Operator document that a Due Diligence System is in place in accordance with Regulation (EU) 995/2010 (EUTR)? Operators placing for the first time on the internal market for distribution or use in the course of a commercial activity any products listed in the annex to Regulation (EU) 995/2010 (EUTR) should present:</p> <ul style="list-style-type: none"> - documents required according to articles 4.2 and 6 of Regulation (EU) 995/2010 (EUTR), - documents required according to article 3, Commission Implementing Regulation (EU) 607/2012, - register of information concerning the Operator's supply as provided for in article 6.1 a) of Regulation (EU) 995/2010 and documentation of application of risk mitigation procedures. <p>If no - don't buy If yes - risk mitigated for this point.</p> <p>Recommended</p> <ol style="list-style-type: none"> 1. Evidence that the Operator is included within the National Operators Registry. 2. Evidence that FLEGT license fees have been paid by Operators importing timber/products from FLEGT-VPA countries. 3. Consultation with authorities in charge of performing controls. 4. Consultation with recognized Monitoring Organizations. 		



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

Indicator	Control measures	Suitability to the context	Risk is mitigated or Alternative Control Measures
3.1 HCV 1 Species diversity	<p>Mandatory</p> <ol style="list-style-type: none"> 1. Desk audit confirm that harvesting does not take place where threatened or endemic species are likely to occur (i.e. harvesting or any equivalent management tool/plan); 2. Desk or field audit confirm that species belonging to HCV 1 are identified and protected during the management activities (i.e. environmental impact assessment); 3. Desk audit ensure that all areas belonging to HCV 1 (including species habitats) are mapped and included under the management plan or any equivalent management tool/plan. <p>Recommended</p> <ol style="list-style-type: none"> 1. Consultation with experts (research entities, local authority, environmental NGOs) confirms the protection of endangered species belonging to HCV 1 -within the sourcing area. 2. Desk audit confirm that forest management plans or equivalent management tool/plan exists and include professional inventory of threatened species; 3. Desk or field audit confirm that relevant management measures which ensure that the risk of management activities threatening species survival is lowered are in place. 	<p>No.</p> <p>Environmental impact assessment is suspended due to the emergency. They need to be replaced by specific derogation authorizing harvesting in areas important for species endemism.</p>	<p>According to the emergency laws established at National level the operations can take place even in protected areas, where protected values are affected after the approval of the harvesting sites (special license for the removal of the timber) and the approval of a derogation of the environmental impact assessment legally required in these sites. In this sense the derogation approval is a tool authorizing harvesting in areas where important species/habitats are identified but where harvesting is not threatening them.</p> <p>Possible alternative CMs are: engagement with experts (as per Annex C, FSC-STD-40-005), stakeholder engagement with local NGOs active in the region, physical verification on site to ensure that timber is not originating from HCV1 areas where HCVs are threatened,</p>



Indicator	Control measures	Suitability to the context	Risk is mitigated or Alternative Control Measures
3.3 HCV 3 Ecosystems and habitats	<p>Mandatory</p> <ol style="list-style-type: none"> 1. Desk or field audit confirm that habitat and ecosystems belonging to HCV 3 are identified and protected during the management activities (i.e. environmental impact assessment); 2. Desk audit ensure that all areas belonging to HCV 3 (including species and habitats) are mapped and included under the management plan/ any equivalent management tool/plan. <p>Recommended</p> <ol style="list-style-type: none"> 1. Consultation with experts (research entities, local authority, environmental NGOs) confirms the protection of endangered species belonging to HCV 3 within the sourcing area. 2. Desk audit confirm that forest management plans exist and include a professional review of endangered ecosystems; 3. Desk or field audit confirm that relevant management measures to ensure that forest management activities do not threaten species survival are implemented (e.g. set aside areas have been identified, adaptive management such as selective harvesting has been planned). 	<p>No. Environmental impact assessment is suspended due to the emergency. They need to be replaced by specific derogation authorizing harvesting in areas important for habitats endemism.</p>	<p>According to the emergency laws established at National level the operations can take place even in protected areas, where protected values are affected after the approval of the harvesting sites (special license for the removal of the timber) and the approval of a derogation of the environmental impact assessment legally required in these sites. In this sense the derogation approval is a tool authorizing harvesting in areas where important species/habitats are identified but where harvesting is not threatening them.</p> <p>Possible alternative CMs are: engagement with experts (as per Annex C, FSC-STD-40-005), stakeholder engagement with local NGOs active in the region, physical verification on site to ensure that timber is not originating from HCV3 areas where HCVs are threatened.</p>