

Evaluation of how wood *biomass from forests and waste and residues from wood industries* with Swedish origin (Country of harvest) comply with Danish REDII legislation¹

Prepared by Preferred by Nature, 2022 (Version 29 August 2022)

¹ *Bekendtgørelse om Håndbog om opfyldelse af bæredygtighedskrav og krav til besparelse af drivhusgasemissioner for biomassebrændsler til energiformål (hereafter referred to as HB 2021)*

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Purpose and Methodology

The analysis outlined in this report has been conducted in order to evaluate whether *wood biomass from forest* and *waste and residues from wood industries* (ref. the list of biomass types published by Energistyrelsen 2021) with Swedish origin (country of harvest) comply with the Danish REDII legislation related to Forest Management (The five REDII requirements and the additional Danish HCV requirement) and Climate (REDII LULUCF requirement and the additional Danish Forest Carbon stock requirement)

The analysis is based on the documentation listed in the Reference Section, including national risk assessments conducted by the Swedish Authorities against the REDII sustainability criteria and the national FSC Controlled Wood risk assessment conducted against the FSC Controlled Wood categories and criteria.

Disclaimer

Preferred by Nature is approved by the Danish Energy Agency to act as a verifier as defined in the Danish REDII legislation. The analysis presented in this report represents the view of Preferred by Nature and provides basis for Preferred by Nature's evaluation of the mentioned biomass types and evidence. The analysis has been submitted to the Danish Energy Agency for their review and comments (August 2022) but does not represent a formal or public conclusion from their side.

Companies covered by the Danish REDII legislation may, on their own discretion, use this report to support their compliance with the legislation. Even though Preferred by Nature consider the analysis to provide robust conclusions we take no responsibility for how the Danish authorities (Danish Energy Agency) evaluate the analysis and its conclusions. Thus, changes to the analysis and conclusions may occur if justified by the Danish authorities.

Scope of the evaluation

Biomass types covered by the evaluation:

The analysis exclusively covers the following biomass types as defined in the Danish Legislation¹ (ref. DANISH REDII LEGISLATION):

- **Forest Biomass**, including Stem wood, Energy trees and forest residues
- **Waste and residues from wood industries**

Country of harvest:

The analysis exclusively covers biomass with **Swedish origin**, i.e. country of harvest is Sweden for all of the mentioned biomass types.

Evaluation Criteria

This analysis is based on the requirements of the Danish REDII legislation as specified in *DANISH REDII LEGISLATION* (see list of references) for Forest Biomass and biomass made from Waste and residues from wood industries. The requirements are related to:

- a) Traceability and classification of biomass type
- b) Forest Management
- c) Climate impact

d) Third party verification

The analysis focuses on how woody biomass with Swedish origin comply with Forest Management (b) and Climate impact (c) requirements.

The analysis also provides recommendations related to point a) and d, i.e. what biomass producers and users can do to ensure compliance with these requirements for biomass with Swedish Origin.

The requirements related to Forest Management and Climate impact are summarized below.

1 REDII Forest management Criteria

REDII Criteria, ref. Article 29, section 6 (a Country level) and (b sourcing area level):

- i. the legality of harvesting operations;
- ii. forest regeneration of harvested areas;
- iii. that areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands and peatlands, are protected unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes;
- iv. that harvesting is carried out considering the maintenance of soil quality and biodiversity with the aim of minimising negative impacts; and
- v. that harvesting maintains or improves the long-term production capacity of the forest.

The requirements apply to Forest Biomass and waste and residues from wood industries

2 Additional Danish Forest Management criteria

Håndbogen, Afsnit 5.4 (Text in Danish): Ekstra krav om beskyttelse af værdifulde områder og arter.

Forvaltningen af skoven skal sikre beskyttelse af biodiversitet, følsomme og bevaringsværdige områder og særlige arter gennem:

- a. *identifikation af særligt følsomme områder eller områder, der er særligt bevaringsværdige, samt*
- b. *beskyttelse af identificerede områder gennem forvaltning af skoven under hensyntagen til de udpegede følsomme og bevaringsværdige områder*

The requirements apply to Forest Biomass only and not to waste and residues from wood industries

3 Land use, LULUCF and forest carbon stock

REDII Criteria, ref. Article 29, section 7 (Text in Danish): Krav vedr. arealanvendelse og LULUCF jf. VE—direktivets art. 29.7

*a) landet eller den regionale organisation for økonomisk integration, hvorfra skovbiomassen stammer er **part i Parisaftalen og***

*i) har forelagt et nationalt bestemt bidrag (**NDC - National Determined Contribution**) for De Forenede Nationers rammekonvention om klimaændringer (UNFCCC), som omfatter emissioner og optag i landbrug, skovbrug og arealanvendelse, **eller***

*ii) har indført **ationale eller regionale love i overensstemmelse med Parisaftalens art. 5**, som finder anvendelse i fældningsområdet, med henblik på at bevare og øge kulstoflagre og -dræn, og dokumenterer, at rapporterede emissioner fra LULUCF-sektoren ikke overstiger optag.*

*b) hvor den dokumentation, der er omhandlet i dette stykkes litra a), ikke er tilgængelig, skal der være indført **systemer til styring på skovkildeområdeniveau** for at sikre, at niveauet af kulstoflagre og -dræn i skovene opretholdes eller forbedres på lang sigt.*

The requirements apply to Forest Biomass and waste and residues from wood industries

4 Ekstra klimakrav til skovbiomasse om bevarelse af kulstoflagre

Håndbogen, Afsnit 5.6 (Text in Danish): Det **ekstra klimakrav** kan opfyldes på en af tre måder:

a) Det dokumenteres, enten for oprindelseslandet eller for skovkildeområdet, at skovkulstoflageret ikke er i tilbagegang.

b) Skovene i kildeområdet er skovcertificerede.

c) Der anvendes kun træ under 20 cm i diameter eller højst 50% af den afsatte biomasse fra kildeområdet afsættes til energiformål.

The requirements apply to Forest Biomass only and not to waste and residues from wood industries

References

The evaluation is based on the following sources of information

- **Bekendtgørelse om Håndbog om opfyldelse af bæredygtighedskrav og krav til besparelse af drivhusgasemissioner for biomassebrændsler til energiformål** (hereafter referred to as *Danish REDII Legislation*)
- **EU Renewable Energy Directive II** (hereafter referred to as *REDII*)
- **FSC-CNRA-SE V1-0 EN: Centralized National Risk Assessment for Sweden** (hereafter referred to as *FSC CW CNRA SWE*)
- **FSC Sweden, 2021. Koll på virket? En rapport om hur regelverket beträffande nyckelbiotoper i den centraliserade nationella riskbedömningen för FSC Kontrollerat virke implementerats** (hereafter referred to as *FSC Sweden, 2021*)
- **Miljøstyrelsen og Energistyrelsen, 2021. Opfyldelse af bæredygtighedskrav for skovbiomasse med dansk oprindelse. VE-direktiv og ekstra krav. Notat udarbejdet af den danske Miljøstyrelse og Energistyrelse, dateret 9. juni 2021**
- **Skogstyrelsen 2019. Rapport 2019/15, Underlag för genomförande av direktivet om främjande av användningen av energi från förnybara energikällor** (hereafter referred to as *Skogstyrelsen 2019*)
- Skogstyrelsen. Press Release 21 December 2021, *Skogsstyrelsen slutar helt registrera nyckelbiotoper* (<https://www.skogsstyrelsen.se/nyhetslista/skogsstyrelsen-slutar-helt-registrera-nyckelbiotoper>)
- **Statens energimyndighet, december 2021 (ER 2021:33) Vägledning gällande regelverket om hållbarhetskrav för biodrivmedel och biobränslen. Version 1.0** (hereafter referred to as *ER 2021:33*)
- **Swedish Forest Agency, Statistics: <https://www.skogsstyrelsen.se/en/statistics/>** (hereafter referred to as *Swedish Forest Statistics*)
- **Skogsdata 2022. Aktuella uppgifter om de svenska skogarna från SLU Riksskogstaxeringen Tema: Den formellt skyddade skogen. Sveriges officiella statistik, 2022. Institutionen för skoglig resurshushållning, SLU Umeå** (hereafter referred to as *Skogsdata 2022*)

Evaluation

This section covers an analysis of how biomass with Swedish origin comply with the above-mentioned requirements of the Danish REDII legislation. The analysis uses a Country level approach (level A) and is based on the mentioned analysis and risk assessments covering Swedish Forest Management legislation and management practices.

Each section of the analysis also includes:

- Conclusion of compliance and identified gaps, if applicable
- Recommendation of how biomass producers can document that requirements related to traceability, biomass classification, forest management and climate impact are met.

Ad 1) REDDII Forest management Criteria (article 29, section 6)

REDDII Criteria - Level A: Country Level

Source	Conclusion
ER 2021:33 Skogstyrelsen 2019	<p>The Swedish Forest and Energy agencies have conducted an analysis based on national legislation and concluded low risk for all five REDII forest management criteria. Thus, the conclusion made by the Swedish Forest and Energy agencies is that biomass from Sweden comply with the five forest management criteria at level A</p> <p><u>ER 2021:33, Section 9.2 Markkriterier för skogsbiomassa:</u></p> <p><i>Sverige har nationell lagstiftning samt övervaknings- och kontrollsystem som säkerställer att markkriterierna för skogsbiomassa uppfylls, så att risken för användning av skogsbiomassa som kommer från ohållbar produktion minimeras. Därmed uppfyller skogsbiomassa som skördas i Sverige markkriterierna för skogsbiomassa. Aktörer behöver därför endast visa på att skogsbiomassan skördats i Sverige för att den ska anses som hållbar (p 83).</i></p> <p><i>För svensk skogsbiomassa behöver aktören kunna visa att råvaran är svensk, med spårbarhet tillbaka till första insamlingsplats (p 81).</i></p>
FSC CW CNRA SWE	(i) Legality (category 1): The risk assessment concludes low risk for all applicable Indicators

	<p>(ii) Regeneration/Conversion (Category 4): The risk assessment concludes low risk for the category</p> <p>(iii) Areas designated by international or national law or by the relevant competent authority for nature protection purposes are protected: The risk assessment for category 1 (Legality) concludes low risk</p> <p>(iv): Maintenance of soil quality and biodiversity: The risk assessment for category 1 (Legality) concludes low risk while specified risk is identified for category 3 (HCV)</p> <p>(v) Maintains or improves the long-term production capacity: Not specifically covered in the FSC CW CNRA, except for category 1 (Legality) for which the risk assessment concludes low risk</p>
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Regarding REDDII Forest management Criteria, article 29, section 6 point iv

With regards to **point iv** of article 29, section 6 the Danish authorities have concluded that this requirement is not met at level A for Denmark (ref. Miljøstyrelsen og Energistyrelsen, 2021). This conclusion is in part due to absence of robust legislation that require identification and protection of applicable biodiversity and nature areas such as woodland key habitats (WKH) and other HCV’s. Based on:

- the approach taken by the Danish authorities with regards to the interpretation of point iv and
- the current situation in Sweden with regards to identification and protection of WKH’s - see Skogstyrelsen. Press Release 21 December 2021

it is unclear whether biomass with Swedish origin meet the interpretation made by Danish authorities with regards to maintenance of biodiversity. Consequently, Preferred by Nature recommend not to classify biomass with Swedish origin as low risk in relation to point iv, unless proper risk mitigation has been implemented to ensure applicable biodiversity, including WKH’s, has been properly identified and protected in the supply base (level B). In addition to the certification schemes approved by the Danish Energy agency for the biomass types covered by this analysis, Preferred by Nature consider FSC Controlled Wood certification as sufficient risk mitigation because the FSC Controlled Wood standard (40-005) and the National Risk assessment for Sweden (FSC-CNRA-SE V1-0 EN) cover both legally protected nature values and biodiversity (category 1) and applicable HCV categories, including WKH’s (category 3) – see section 2 below.

Conclusion: The Biomass types, Forest Biomass and waste and residues from wood industries, with Swedish origin (country of harvest) comply with four of five REDII forest management criteria, i.e. point i, ii, iii and v. The conclusion applies to both non-certified as well as certified (FSC, PEFC, SBP) biomass with Swedish Origin



However, based on the analysis outlined above Preferred by Nature can only accept classification of biomass with Swedish origin as low risk in relation to point iv, if there is evidence that sufficient risk mitigation has been implemented to ensure applicable biodiversity, including WKH's has been properly identified and protected at supply base level (level B).

Recommendations: Preferred by Nature recommend not to classify biomass with Swedish origin as low risk in relation to point iv, unless there is evidence that sufficient risk mitigation has been implemented to ensure applicable biodiversity, including WKH's has been properly identified and protected at supply base level (level B).

In addition to the certification schemes approved by the Danish Energy agency for the biomass types covered by this analysis, Preferred by Nature consider FSC Controlled Wood certification for biomass with Swedish origin (i.e. country of harvest) as sufficient risk mitigation in relation to point iv.

In addition Biomass Producers must provide assurance of **traceability and valid classification of Biomass type**.

- The following certification schemes and claims are approved by the Danish Energy Agency as evidence of traceability: FSC Certified (FSC Mix Credit, FSC 100%), PEFC Certified (100% PEFC certified), SBP Certified (SBP Compliant). In addition to the certification claim the certified supplier shall provide valid information about country of harvest and biomass type
- FSC Controlled Wood certified biomass (ref. this analysis). In addition to the certification claim the certified supplier shall provide valid information about country of harvest and biomass type
- For biomass which is not covered by any of the mentioned certification schemes other types of third-party verification of traceability to country of harvest and compliance with mass balance requirements is required.

Note: Only companies certified to the above-mentioned schemes can make valid certification claims

Ad 2) Additional Danish Forest Management requirement – HCV

Level A: Country Level

Source	Conclusion
ER 2021:33 Skogstyrelsen 2019	Not included in the risk assessment
FSC CW CNRA SWE	<p>Indicator 3.0: Low risk</p> <p>Indicator 3.1: Low risk: Blekinge, Jönköping and Skåne, and all areas where there is no sourcing from WKHs. Specified risk: All other areas</p> <p>Indicator 3.2: Specified risk: IFLs in Norbotten below the Naturvårdsgränsen, and montane forests at elevations above the Naturvårdsgränsen. Low risk: All other forests</p> <p>Indicator 3.3: Low risk: Blekinge, Jönköping and Skåne, and all areas where there is no sourcing from WKHs. Specified risk: All other areas</p> <p>Indicator 3.4: Low risk</p> <p>Indicator 3.5: Specified risk: Reindeer herding area Low risk: all other areas</p> <p>Indicator 3.6: Low risk</p>
FSC Sweden, 2021	Report which outlines the actions Swedish companies are implementing to mitigate the identified risk and conclude that the procedures are generally well implemented. The described actions are in line with the requirements of the Danish HCV requirement

Evidence at supply base level (level B)

According to section 5.4.1 of the *Danish REDII Legislation* evidence of compliance with this criterion can only be made at supply base level (level B evidence). Section 5.4.2 refer to SBP, FSC FM and PEFC FM certification as examples of acceptable types of evidence. As FSC Controlled wood is based on a



risk-based approach to risk mitigation at supply base level, like SBP, the FSC controlled wood system is considered to meet the requirements for evidence and documentation outlined in section 5.4.1 and 5.4.2 of the Handbook.

Conclusion: The Biomass type Forest Biomass with Swedish origin (country of harvest) do not comply with the criteria. Thus, risk mitigation is required in order to ensure compliance with the Danish HCV criteria for Forest Biomass. Biomass that is not covered by applicable risk mitigation should be considered as non-compliant.

Possible Risk Mitigation: Third party verified evidence of origin and HCV protection:

- The following certification schemes and claims are approved by the Danish Energy Agency as evidence of compliance: FSC Certified (FSC Mix Credit, FSC 100%), PEFC Certified (100% PEFC certified), SBP Certified (SBP Compliant)
- Preferred by Nature consider FSC Controlled Wood certified material as sufficient assurance of compliance with the HCV criteria. The conclusion is based on the following:
 - o FSC Controlled Wood standard (40-005) and the National Risk assessment for Sweden (FSC-CNRA-SE V1-0 EN) cover both legally protected nature values and biodiversity (category 1) and all HCV categories, including WKH's (category 3).
 - o Category 3 of the FSC Controlled Wood standard (40-005) defines HCV in line with the Danish legislation
 - o The FSC Controlled Wood standard (FSC-STD-40-005) require companies that source from not FSC certified forests in Sweden to implement actions that are sufficient to mitigate the identified risk, and thereby ensure identification and protection of HCV's. In addition, the standard requires traceability of the material to sourcing area and third-party verification of compliance.
 - o FSC Sweden has published a report (*FSC Sweden, 2021*) which outlines the actions Swedish companies are implementing to mitigate the identified risk and conclude that the procedures are generally well implemented. The described actions are in line with the requirements of the Danish HCV requirement

Recommendations: Biomass Producers should provide assurance of traceability and valid classification of Biomass type.

- The following certification schemes and claims are approved by the Danish Energy Agency as evidence of traceability: FSC Certified (FSC Mix Credit, FSC 100%), PEFC Certified (100% PEFC certified), SBP Certified (SBP Compliant). In addition to the certification claim the certified supplier shall provide valid information about country of harvest and biomass type



- FSC Controlled Wood certified biomass (ref. this analysis). In addition to the certification claim the certified supplier shall provide valid information about country of harvest and biomass type
- For biomass which is not covered by any of the mentioned certification schemes other types of third-party verification of traceability to country of harvest, compliance with mass balance requirements and compliance with the HCV requirement is required.

Note: Only companies certified to the above-mentioned schemes can make valid certification claims

Example of other third-party verification

Preferred by Nature RBP verification provides assurance of verification of origin and classification of biomass type in line with the Danish REDII Legislation. In addition, the standard requires risk mitigation in line with FSC CW requirements, either based on:

- Evidence of origin to low-risk area (Material which originates from Blekinge, Jönköping or Skåne is considered to be low-risk for the HCV category and therefore can be considered as compliant with the HCV requirement), or
- FSC Controlled Wood certification

Ad 3) REDDII LULUCF Criteria: (article 29, section 7)

Source	Conclusion
<p>ER 2021:33</p> <p>Skogstyrelsen 2019</p>	<p>ER 2021:33, Section 9.2.2 Markkriterier för skogsbiomassa</p> <p><i>Sverige är part i och har ratificerat Parisavtalet. Därmed uppfyller svensk skogsbiomassa denna paragraf per definition (p 84)</i></p> <p><i>Sverige ingår i EU:s nationellt fastställda bidrag (NDC). EU och dess medlemsstater har antagit ett bindande mål om minst 40 % inhemska reduktion av utsläpp av växthusgaser till år 2030 jämfört med år 1990, som ska genomföras gemensamt. Utsläpp och upptag av växthusgaser i LULUCF-sektorn regleras som en separat del i EU:s ramverk för klimat och energi till 2030, LULUCF-förordningen (p 84)</i></p> <p><i>Sverige har nationell lagstiftning samt övervaknings- och kontrollsystem som säkerställer att markkriterierna för skogsbiomassa uppfylls, så att risken för användning av skogsbiomassa som kommer från ohållbar produktion minimeras. Därmed uppfyller skogsbiomassa som skördas i Sverige markkriterierna för skogsbiomassa. Aktörer behöver därför endast visa på att skogsbiomassan skördats i Sverige för att den ska anses som hållbar, vilket kan göras genom t.ex. uppgift om partiets ursprung på avverkningsanmälan eller mättningsbesked (p 84)</i></p> <p>The evaluation concludes that the LULUCF criteria is fulfilled at country level (Level A)</p>
<p>FSC CW CNRA SWE</p>	<p>Not included in the FSC CW risk assessment</p>

Conclusion: Forest Biomass and waste and residues from wood industries with Swedish origin (country of harvest) comply with the LULUCF requirement. The conclusion applies to both non-certified as well as certified (FSC, FSC CW, PEFC, SBP) biomass with Swedish Origin.



Ad 4) Ekstra klimakrav til skovbiomasse om bevarelse af kulstoflagre

DANISH REDII LEGISLATION states that (terxt in Danish): Dokumentation for opfyldelse af kravet 'kan være en national eller en regional skovstatistik lavet af en uafhængig sagkyndig, som viser, at kulstofindholdet i den stående vedmasse (levende træer over jord) samt evt. i dødt ved i den seneste 5-årsperiode frem til seneste statistik-år ikke er faldet i forhold til det gennemsnitlige skovkulstoflager i den foregående 5-årsperiode eller i forhold til perioden 2015 – 2020. Det er som minimum tilstrækkeligt, at statistikken indeholder data for den levende biomasse over jord (stående vedmasse), men mængden af dødt ved kan inkluderes, såfremt der findes pålidelige data herfor'.

Source	Conclusion
ER 2021:33 Skogstyrelsen 2019	Not included in the risk assessment
FSC CW CNRA SWE	Not included in the FSC CW risk assessment
Skogsdata 2022	The report Skogsdata 2022 show that the requirement is met, ref. figure 1.7 (page 62). https://www.slu.se/globalassets/ew/org/centrb/rt/dokument/skogsdata/skogsdata_2022_webb.pdf

Conclusion: Forest Biomass (and Waste and residues from wood industries) with Swedish origin (country of harvest) comply with the Forest Carbon requirement. The conclusion applies to both non-certified as well as certified (FSC, FSC CW, PEFC, SBP) biomass with Swedish Origin.

Recommendations: Biomass Producers should provide assurance of traceability and valid classification of Biomass type.

- The following certification schemes and claims are approved by the Danish Energy Agency as evidence of traceability: FSC Certified (FSC Mix Credit, FSC 100%), PEFC Certified (100% PEFC certified), SBP Certified (SBP Compliant). In addition to the certification claim the certified supplier shall provide valid information about country of harvest and biomass type
- FSC Controlled Wood certified biomass (ref. this analysis). In addition to the certification claim the certified supplier shall provide valid information about country of harvest and biomass type
- For biomass which is not covered by any of the mentioned certification schemes other types of third-party verification of traceability to country of harvest and compliance with mass balance requirements is required.

Note: Only companies certified to the above-mentioned schemes can make valid certification claims



Summary of assurance of compliance

The table below provides an overview of the assurance biomass producers should provide to show compliance with Danish REDII Legislation for *Forest Biomass* (including Stem wood, Energy trees and forest residues) and *Waste and residues from wood industries* with **Swedish origin (i.e. country of harvest)**. *Note: Requirements marked with * do not apply to the biomass type Waste and residues from wood industries*

Requirement/Evidence of compliance	FSC Certified (FSC 100%, FSC Mix Credit)	FSC Controlled Wood Certified	PEFC Certified (100% PEFC certified)	SBP Certified (SBP Compliant)	PBN RBP Verified	No third-party verification
Traceability and mass balance						
REDII Forest Management Requirements					Require FSC, FSC CW, PEFC or SBP certification	Risk mitigation required for point iv
Additional Forest Management requirement (HCV) *					Require FSC, FSC CW, PEFC or SBP certification	
REDII LULUCF requirement						
Additional Carbon Stock requirement *						
Evidence of country of harvest	Provided on request ¹ Subject to verification ²	Provided on request ¹ Subject to verification ²	Provided on request ¹ Subject to verification ²	Provided on request ¹ Subject to verification ²		Provided on request ¹ Subject to verification ²
Evidence of biomass type	Provided on request ¹ Subject to verification ²	Provided on request ¹ Subject to verification ²	Provided on request ¹ Subject to verification ²	Provided on request ¹ Subject to verification ²		Provided on request ¹ Subject to verification ²

¹ **Provided on request:** Buyer shall request this information from the biomass supplier. Information shall be provided for each shipment/invoice

² **Subject to verification:** Verifier can request further evidence to support the information provided by the seller.

FSC Controlled Wood Categories

Under FSC's controlled wood standard, organizations must commit to and implement a due diligence system to ensure their raw materials are sourced from low-risk sources which excludes the following five unacceptable categories:

1. illegally harvested wood
2. wood harvested in violation of traditional and human rights (for example forced or child labour)
3. wood harvested in forests in which high conservation values are threatened by management activities
4. wood harvested in forests being converted to plantations or non-forest use
5. wood from forests in which genetically modified trees are planted.

For a detailed overview of Controlled Wood Criteria and Indicators see *Requirements for Sourcing FSC Controlled Wood, FSC-STD-40-005 V3-1 EN* ([link](#))