



FSC Controlled Wood risk assessment

SPECIFIC REQUIREMENTS

INTERPRETATION OF ANNEX 2B OF THE STANDARD FOR COMPANY EVALUATION OF
FSC CONTROLLED WOOD FOR ITALY
(FSC-STD-40-005-V-2.1)

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National Approval: FSC Italy, General Assembly

International Approval: FSC International Center: Policy and Standards Unit

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Summary of the Assessment

Scopes:

- *Geographical scope:* Italy (overall country, 20 regions, including 2 autonomous provinces);
- *CW categories:* A) illegally harvested wood; C) wood harvested in forests where high conservation values are threatened by management activities;
- *Kinds of forests:* broadleaf deciduous forests and evergreen coniferous forests both for the Alpine and the Apennine/Mediterranean regions, including plantations.

Controlled Wood categories	Risk level
1. Illegally harvested wood	Unspecified risk
3. Wood harvested in forests where high conservation values are threatened by management activities	Low Risk



Conclusions and some remarks

It is to be remarked that the “unspecified risk” *status* is mainly the result of assessment against indicators (i.e. CPI and WB Rule of Law Index) defined at national scale. This means companies wishing to carry out their own Risk Assessment shall collect additional evidences at a lower scale if they want to show the wood and wood-based products they buy meet requirements for Controlled Wood.

> What is FSC Controlled Wood?

Controlled Wood standards were introduced by FSC in 2004, then updated in 2007. Controlled Wood refers to non FSC certified virgin wood¹ independently verified as non belonging to one or more of the following categories:

- a. illegally harvested wood;
- b. wood harvested in violation of traditional and civil rights;
- c. wood harvested in forests where high conservation values are threatened by management activities;
- d. wood harvested in forests being converted to plantations or non- forest use;
- e. wood from forests in which genetically modified trees are planted.

Controlled Wood can be used as an input for FSC certified products according to requirements described by FSC standards for chain of custody.

Uncontrolled Wood shall never be used in FSC products.

> What is the National Risk Assessment for Controlled Wood?

FSC Controlled Wood and related standards were designed by FSC to help manufacturers and traders to avoid buying wood from the most controversial sources, inconsistent with FSC certification. There are different options for a company to achieve this:

1. purchase wood from forest enterprises that have been verified by an FSC accredited Certification Body (CB) to meet the requirements of FSC-STD-30-010 v. 2-0 FSC Controlled Wood standard for forest management enterprises;
2. purchase FSC Controlled Wood from suppliers holding a valid FSC Chain of Custody certificate which includes FSC Controlled Wood in its scope;
3. internally verify its wood sources according to the requirements of FSC-STD-40-005 v. 2-1 Company evaluation of FSC Controlled Wood. The Risk Assessment shall be assessed and approved by an accredited CB.

As highlighted in FSC-STD-40-005 v. 2-1 Annex 2, FSC accredited National Initiatives (NIs) and FSC National and Regional Offices can provide guidance to help companies identify

¹ For the purposes of the present document the word “wood” refers to wood and derived products, including fibres, cellulose and paper.



credible sources of information to get at a sound risk assessment decision. In particular, in order to help companies, FSC-accredited National Initiatives, National or Regional Offices may coordinate a Risk Assessment for any number of districts against one, several or all of the five FSC Controlled Wood categories. Procedures for the development of a Risk Assessment by FSC accredited National Initiatives (NIs) and FSC National and Regional Offices are described in FSC-PRO-60-002 v. 2-0.

When the Risk Assessment is evaluated by FSC to comply with the requirements of this procedure, the Risk Assessment becomes mandatory for the district in question and shall be used by companies as conclusive when assessing the risk of their supplies.

The advantage of this approach is that all companies sourcing from a particular district shall be using the same approved Controlled Wood Risk Assessment and therefore will not individually have to repeat the process, thus saving time and resources.

> How was this document developed?

The present document has been developed in compliance with FSC-PRO-60-002 v. 2-0. The scope of the Risk Assessment and references are reported in the corresponding paragraphs below.

> Stakeholders consultation

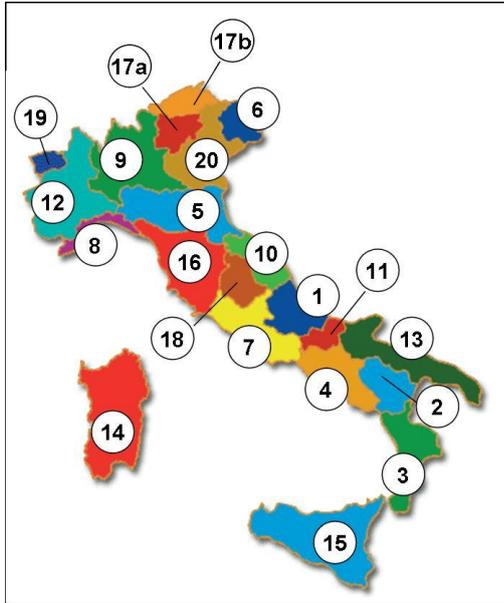
According to FSC-PRO-60-002 v. 2-0 a first draft (Draft 1-0) of this document was published and sent around on 5th April 2011. A Form for comments was provided as well, explaining how to take part to the consultation. Consultation process was closed on 7th May 2011. Received comments were analysed and - where relevant - included in draft 1-1 of the Risk Assessment, together with minor amendments. Since amendments did not imply substantial changes to the first draft of the document a second consultation round was not implemented. Nevertheless, in order to stimulate stakeholders attention on Controlled Wood issues further activities were implemented, including the development and publication of a basic Guide presented at "Terra Futura" (Florence, 20th-22nd May 2011) and the organisation of a dedicated stakeholders meeting to collect comments and insights from interested parties (Rome, 6th June, 2011).

> Scope of the Risk Assessment

Geographical scope

Country: Italy. Italian 19 administrative regions and 2 autonomous provinces have been considered as districts - ex FSC-STD-40-005 v. 2-1 - for the purposes of the Risk Assessment (figure 1). This is due to the fact that according to D.P.R. 15th January 1972, n. 11 (including following laws, such as D.L. 18th May 2011, n. 227), administration and legislative functions on agriculture and forestry issues has been transferred to Regions. As a consequence they have full competence for defining/adopting Forest Laws and more generally they have full responsibility over forest management regulation activities within their territories.

Figure 1 – Italian 19 administrative regions and 2 autonomous provinces



#	Regione
1	Abruzzo
2	Basilicata
3	Calabria
4	Campania
5	Emilia Romagna
6	Friuli Venezia Giulia
7	Lazio
8	Liguria
9	Lombardia
10	Marche
11	Molise
12	Piemonte
13	Puglia
14	Sardegna
15	Sicilia
16	Toscana
17	Trentino Alto Adige
	17a Provincia Autonoma di Trento 17b Provincia Autonoma di Bolzano
18	Umbria
19	Valle d'Aosta
20	Veneto

Controlled Wood categories taken into consideration (ex FSC-STD-40-005 v. 2-1):

- a. Illegally harvested wood;
- b. Wood harvested in forests where high conservation values are threatened by management activities.

> References

- › FSC-STD-40-005 v. 2-1 (April 2007) - *Standard for company evaluation of FSC Controlled Wood*;
- › FSC-DIR-40-005 (December 2010) - *FSC Directive on FSC Controlled Wood*;



- › FSC-PRO-60-002 v. 2-0 (February 2009) - *FSC Controlled Wood Risk Assessments by FSC accredited National Initiatives, National and Regional offices;*
- › FSC-PRO-60-002a (December 2010) - *List of approved National and Regional Controlled Wood Risk Assessments).*

To download these documents please visit: www.fsc.org or contact FSC-Italy.

> Resources

Involved staff: FSC-Italia Secretary and external experts (B&C Group and For.Etica Srl*)

Facilitator: Mr. Dario Paletta (+39 339 7447445 – info@bncgroup.it and info@fsc-italia.it)

The project has been co-financed by FSC International, WWF and SIDA (Swedish International Development Cooperation Agency).

Co-operation and partnership have also been established with SCORE (Stop Crimes on Renewables and Environment) Project, co-financed by the Prevention of and Fight against Crime Programme of the European Union (European Commission-Directorate General Home Affairs).

For detailed information please visit: <http://www.euscore.eu/>.

In the frame of SCORE project, FSC-Italy will be involved in the following activities:

- › field-testing of new approaches and tools aiming to check legality in forestry, with special reference to the "FSC-Controlled Wood" system and procedures;
- › creation of a practical toolkit to provide forest-wood operators with useful tools for managing with legality issues regarding the forest sector and wood in day to day activities;
- › organisation and coordination of a conference at Padua University on the issues of illegality in forestry/wood sector, in order to present the results of the survey.

Moreover, in the frame of the SCORE Project FSC-Italy is co-operating with TeSAF Department (University of Padova) in carrying out research on role and impacts of the organized crime on the forest sector and timber market at national level.

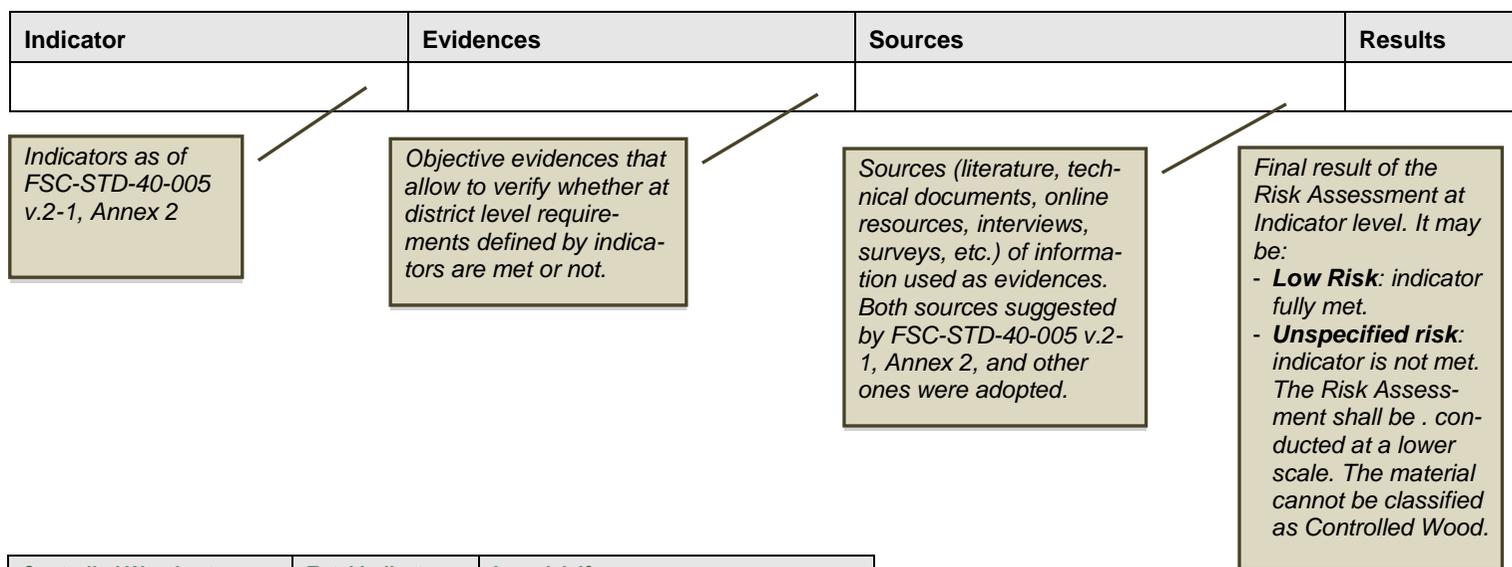
* For.Etica Srl was involved in the development of a Guide on Controlled Wood.



> Risk Assessment: results

For the purposes of the Risk Assessment indicators defined by FSC-STD-40-005 v.2-1, Annex 2, have been used.

How to read the results:



Controlled Wood category	Total Indicators	Low risk if
1. Illegally harvested wood	4	Compliance with all indicators
3. Wood harvested in forests where high conservation values are threatened by management activities	2	Compliance with at least 1 indicator



a. Illegally harvested wood

Indicators	Evidences	Sources	Results
<p>1.1 Evidence of enforcement of logging related laws in the district</p>	<p>Specific norms regulating forest logging/harvesting activities exist at regional level. All regions have adopted a Forestry Law or local forest prescriptions known as <i>Prescrizioni di Massima e Polizia Forestale</i>, PMPF.</p> <p>10 regions have also developed and adopted a Regional Forestry Regulation.</p> <p>Additional details for each district are provided in Appendix 1, Table 1.</p>	<p>Data and evidences were collected from figures and documents available on the official websites of regional (or provincial) bodies in charge of forest management issues at regional/provincial level.</p> <p>Additional sources of information were taken into consideration:</p> <p>National Inventory of Forests and Carbon Sinks (<i>Inventario Nazionale delle Foreste e dei Serbatoi di Carbonio</i>, INFC) www.infc.it</p> <p>Framework Program for the Forest Sector (<i>Programma Quadro per il Settore Forestale</i>, PQSF) http://www.reterurale.it/flex/cm/pages/ServeBLOB.php/L/IT/IDPagina/416</p> <p>Progetto bosco Action included in the Ri.Selv.Italia Project funded by the Ministry of Agricultural, Food and Forestry Policies, sub-project on informative and support systems for forest management. It includes a section dedicated to forestry legislation at regional level http://www.progettobosco.it/</p> <p>National Observatory on the Market for Forestry Products and Services It provides a detailed overview of the forestry sector regulations currently in force at regional level http://www.sian.it/osservatorio/isp/mwanal153.js</p>	<p>Low Risk</p>



		<p>p?classe=3&area=0&ricerca=0</p> <p>Ambiente diritto.it It provides a detailed overview of the forestry sector regulations currently in force at national level http://www.ambientediritto.it/legislazione/boschi/boschi.htm</p>	
<p>1.2 There is evidence in the district demonstrating the legality of harvests and wood purchases that includes robust and effective systems for granting licenses and harvest permits.</p>	<p>In all regions a system for the control of forest logging activities is in place. Such activities are subject to <i>ex-ante</i> or <i>ex-post</i> verification by the competent bodies (State Forestry Corps, <i>Corpo Forestale dello Stato</i>, CFS).</p> <p>Harvestings are subject to a Declaration Procedure or an Authorisation Procedure, with the only exception of small-scale harvesting operations. The definition of “small-scale” can vary from region to region and depends on forest management practices too. For coppices it is normally defined in terms of harvesting area, while for high forests it is normally defined with reference to the maximum withdrawable timber volume (normally 100 m³).</p> <p>Additional details for each district are provided in Appendix 1, Table 1.</p>	<p>Data and evidences were collected from figures and documents available on the official websites of regional (or provincial) bodies in charge of forest management issues at regional/provincial level.</p>	<p>Low Risk</p>
<p>1.3 There is little or no evidence or reporting of illegal harvesting in the district of origin.</p>	<p>The evidence of illegal logging in Italy is quite limited.</p> <p>Official statistics on illicit and criminal actions infringing forest laws, and hydrogeological and landscape regulatory constraint for 2005 (i.e. the most recent available statistics) reported 84 criminally relevant infringements on a total number of about 94,000 annual harvesting operations conducted on average at national level.</p> <p>Such figures mainly refer to the Autonomous Province of Bolzano (68%) and – more marginally – to other 4 regions (Emilia Romagna, Friuli Venezia Giulia, Puglia and Sicilia). In general terms, the total number of</p>	<p>ISTAT (National Institute of Statistics) Statistics on illicit and criminal actions infringing forest laws, and hydrogeological and landscape regulatory constraint for 2005, per type and region http://www.istat.it/agricoltura/datiagri/foreste/elefor.html</p>	<p>Low Risk</p>



	<p>illicit and criminal actions resulted in about 7,000 units. They prevalently took place in Central (40) and Southern (37%) Italy. Most of such infringements have been reported for the following regions: Lazio, Toscana, Sicilia, Umbria and Lombardia.</p> <p>From the consultation of annual reports and press releases by the State Forestry Corps it becomes clear sanctions and confiscations imposed for illegal or unauthorized logging are not very common.</p> <p>At the same time it must be underlined that the Italian forest sector is not totally free from illegality. This however seems to focus on businesses and activities other than illegal logging <i>sensu strictu</i>, involving for example illegal building, fires, grazing, waste disposal, poaching, etc. It shall also be remembered – on the basis of the results emerging from 2010 Legambiente Report on Ecomafie – that some clear evidences of the infiltration of organised criminal organisations in the forests sector and forest management activities (mainly with reference to sub-contracting) exist, especially in Central and Southern Italy.</p> <p>For example, the abovementioned report by Legambiente states (page 36): "... <i>forest mafia, especially in the land of Aspromonte</i> [note: Calabria], <i>is an ancient phenomenon that is strongly coming back: in November 2009 several people were arrested for being involved in the alliance of four 'ndrine</i> [note: local criminal groups in Calabria] <i>to get full control over forest activities. Each contract for the management and harvesting of forests, for example, illegally yielded to them at least 5,000 Euros. These were mainly connected to the fact that local companies had to pay due to 'protection racket'</i>"</p>	<p>State Forestry Corps (<i>Corpo Forestale dello Stato</i>, CFS) Operating activities dossier http://www3.corpoforestale.it/flex/cm/pages/ServeBLOB.php/L/IT/IDPagina/36</p> <p>Press releases http://www3.corpoforestale.it/flex/cm/pages/ServeBLOB.php/L/IT/IDPagina/102</p> <p>Legambiente Rapporto Ecomafie 2010 http://risorse.legambiente.it/docs/premessa.0000001845.pdf</p>	
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	<p>As a final remark, it shall be observed that - as highlighted by several studies, such as those by Pettenella and Ciccarese (2009) and Pettenella and Andrighetto (2011) - the evident discrepancies between data reported by official national statistics on forest harvestings (mainly with regard to firewood production) and statistics/studies on domestic wood production, import, export and consumption may not allow to speak about illegal logging <i>sensu strictu</i>, nevertheless they suggest the presence of a huge and spread condition of “informal economy” dealing with the forest sector at national level.</p> <p>Although at the present evidences regarding illegal logging are very limited, a continuous monitoring activity is strongly recommended. New inputs and insights on this are expected from the survey conducted by TeSAF Department (University of Padova) in the frame of SCORE Project.</p>	<p>Pettenella D., Ciccarese L. (2009). Stock e flussi nel sistema forestale. Tentativo di lettura incrociata dei dati italiani. Sherwood (154), p. 5-13.</p> <p>Pettenella, D., Andrighetto, N. (2011). Le biomasse legnose a fini energetici in Italia: uno sleeping giant? Agriregionieuropa Anno 7, Numero 24, p. 18-22. http://agriregionieuropa.univpm.it/riviste/agriregionieuropa_n24.pdf</p>	
1.4 There is a low perception of corruption related to the granting or issuing of harvesting permits and other areas of law enforcement related to harvesting and wood trade.	<p>According to ADVICE-40-005-12 in FSC-DIR-40-005 (December 2010) indicator 1.4 is met when the Corruption Perception Index, CPI referred to the country being assessed is higher than 5.</p> <p>According to 2010 CPI Report published by Transparency International, CPI for Italy is 3,9, i.e. lower than the minimum threshold value for compliance with FSC Controlled Wood requirements.</p>	<p>Transparency International Corruption Perception Index (CPI) 2010 http://www.transparency.org/policy_research/surveys_indices/cpi/2010/results</p>	Unspecified Risk

c. Wood harvested in forests where high conservation values are threatened by management activities

Indicators	Evidences	Sources	Results
3.1 Forest management activities	Evidences found with regard to ecoregions		Low Risk



<p>in the relevant level (eco-region, sub-eco-region, local) do not threaten eco-regionally significant high conservation values.</p>	<p>indicated in FSC-STD-40-005 v.2-1, Annex 2, are reported below:</p> <ol style="list-style-type: none"> 1. <i>Conservation International Biodiversity Hotspots</i>: Mediterranean Basin 2. <i>WWF Global 200 Ecoregion</i> <p>Considering only terrestrial ecosystems, 2 of the ecoregions identified by WWF can be found in Italy:</p> <ul style="list-style-type: none"> - Mediterranean Forests, Woodlands, & Shrub, including: <ul style="list-style-type: none"> › PA1211: Italian sclerophyllous and semi-deciduous forests; › PA1218: South Appenine mixed montane forests; › PA1222: Tyrrhenian-Adriatic sclerophyllous and mixed forests; - European-Mediterranean Montane Mixed Forests, including: <ul style="list-style-type: none"> › PA0401: Appenine deciduous montane forests; › PA0432: Po Basin mixed forests; › PA0501: Alps conifer and mixed forests. <p>For both ecoregions the conservation status is classified as “Critical/Endangered”. It shall be specified however that – as highlighted by WWF itself – this is just marginally depending on forest management activities (mainly in the case of PA1218 and PA0401). In all other cases real and potential threats are to be referred to different human activities, with special reference to tourism and expansion of urban/industrial areas, as well as to fires (both natural and human induced). It is also to be remembered that in mountain areas (mainly PA0501) very evident forest recolonization processes can be observed, mainly</p>	<ol style="list-style-type: none"> 1. Conservation International Biodiversity Hotspots: http://www.biodiversityhotspots.org/xp/hotspots/mediterranean/Pages/default.aspx 2. WWF Global 200 Ecoregion Ecoregions relevant for the Italian context have been identified on the basis of data reported in the GIS database available at http://wwf.panda.org/about_our_earth/ecoregions/maps/ <p>The current conservation status of identified ecoregions and relative sub-typologies has been verified on the basis of information available at: http://www.worldwildlife.org/wildworld/profiles/terrestrial_pa.html</p>	
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	<p>because of the abandonment of such areas and the consequent lack of an active forest (and more broadly, territory) management. Therefore in such cases one of the main threats for forest ecosystem conservation is represented by the lacking or insufficient (active) forest management.</p> <p>3. <i>World Conservation Union (IUCN) Centres of Plant Diversity</i>: 3 out of 21 Centres of Plant Diversity and Endemism identified at European level can be found in Italy: Eu11 - Alps, Eu 12 - Appennines and Apuane Alps, Eu - 13 Tyrrhenian. Islands: Sardinia, Sicily and other islands.</p> <p>4. <i>Conservation International High Biodiversity Wilderness Area</i>: there are no High Biodiversity Wilderness Area in Italy</p> <p>5. <i>World Resources Institute (WRI) Frontier Forests</i>: there are no frontier forests in Italy</p> <p>6. <i>Greenpeace Intact Forests Landscape</i>: there are no Intact Forest Landscape in Italy</p> <p>Table 1 in Annex 2 includes a summary of evidences collected with regard to Indicator 3.1. To summarise it can be said high conservation values can be widespreadly found in all districts. Forest management activities, however, do not represent a threat to conservation values but in few and isolated cases.</p>	<p>3. World Conservation Union (IUCN) Centre of Plant Diversity Worldwide Fund for Nature and World Conservation Union (1994). Centres of Plant Diversity: A Guide and Strategy for their Conservation. Volume 1 - Europe, Africa, South West Asia and the Middle East. Cambridge, UK:IUCN Publications Unit.</p> <p>4. Conservation International High Biodiversity Wilderness Area http://www.conservation.org/explore/priority_areas/wilderness/Pages/default.aspx</p> <p>5. World Resources Institute (WRI) Frontier Forests http://www.wri.org/publication/last-frontier-forests http://multimedia.wri.org/frontier_forest_maps/</p> <p>6. Greenpeace Intact Forests Landscape http://www.intactforests.org/data.ifl.html</p>	
<p>3.2 A strong system of protection (effective protected areas and legislation) is in place that ensures survival of the HCVs in the ecoregion.</p>	<p>1. Protected areas in Italy</p> <p>Data reported in the present session have been elaborated from official sources, quoted on the column on the right, and on the basis of information reported by Maesano <i>et al.</i>,</p>	<p>Maesano M, Giongo Alves MV, Ottaviano M, Marchetti M, 2011. National-scale analysis for the identification of High Conservation Value Forests (HCVFs). Forest@ 8: 22-34. [online: 2011-02-17] http://www.sisef.it/forest@/show.php?id=649&lang=en</p>	<p>Unspecified risk</p>



	<p>2010 (see Annex 3, figure 1).</p> <p>1.1 Natura 2000 Network Italy hosts 3 of the 9 biogeographical regions identified within the European Union for the purposes of Natura 2000 Network. The 3 regions are: Alpine, Continental and Mediterranean. The Natura 2000 Network covers more than 20% of the National area, totalizing more than 6.2 million hectares. On the basis of the last up-dating prepared by the European Commission in 2008, 1,809 forestry relevant Sites of Community Interest (SCI) and 448 forestry relevant Special Protection Zones (SPZ) can be identified.</p> <p>1.2 Parks 24 National Parks already exist – covering a land area of 1,465,681 hectares – while 6 areas are in the formal process for being recognised as National Parks. Moreover 134 Regional Natural Parks – covering a land area of 1,294,655.87 hectares – exist as well.</p> <p>1.3 Reserves 147 State Natural Reserves – covering a land area of 122.775,90 hectares – and 365 Regional Natural Reserves – covering a land area of 230,240.21 hectares – exist.</p> <p>1.4 Other Protected Natural Areas at Regional Level 171 Other Protected Natural Areas at Regional Level – different from previously described categories - are included in the Official List of Protected Natural Areas (OLPNA, <i>Elenco Ufficiale delle Aree Naturali Protette</i>, EUAP) defined by the Ministry of Environment. They cover a land area of 50,237.72</p>	<p>1.1 Natura 2000 Network <i>MATTM, Natura 2000 (2010)</i> http://www.minambiente.it/home_it/menu.html?menuitem=/menu/menu_attivita/RN2000_SIC_e_ZPS_in_Italia.html&menu=/menu/menu_attivita/argomenti.html/menu/menu_attivita/biodiversita_fa.html/menu/menu_attivita/Rete_Natura_2000.html/menu/menu_attivita/RN2000_SIC_e_ZPS_in_Italia.html&lang=it</p> <p>MATTM (2010). Official List of Protected Natural Areas (EUAP) – Sixth up-date. Approved with Resolution of the State-Regions Council on 17th December 2009. Published on Official Journal n. 125, 31.05.2010 http://www.minambiente.it/home_it/menu.html?mp=/menu/menu_attivita/&m=Elenco_ufficiale_delle_aree_naturali_pro.html#elenco</p>	
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	<p>hectares.</p> <p>1.5 Areas not classified under EUAP Areas not included in EUAP for different reasons – mainly to be referred to non-compatibility with the Framework Law for Protected Areas (see next point 1.6) – but nevertheless identified at local level and all characterised by protection/conservation purposes (e.g. WWF and Lipu oasis etc.).</p> <p>1.6 Status of forestry ecosystems The national protected areas system is regulated by the Framework Law for Protected Areas (L. 6 December 1991, n. 394). Italy signed several international agreements and conventions, <i>in primis</i> the International Convention on Biodiversity (ratified with the Law 14th February 1994, n. 124). The National Strategy for Biodiversity has been approved in 2010. With regard to the state of forest ecosystems the 4th National Report for the Convention on Biodiversity (2009) and the Framework Program for the Forest Sector (2008) highlight that the main threats are not depending on inappropriate forest management activities, but on the expansion of unmanaged forest areas with consequent impacts in ecological (forests ageing, increased fire risk, hydrogeological instability, phytopathologies, etc.), social (loss of skilled workers, competences and culture, irregular and untrained foreign workers, etc.) and economic (loss of commercial value for certain products, low profitability connected to ordinary forest management activities, qualitative-quantitative decrease of ecosystem services produced by the forests, dependency from forest-products imports, reduced job and income opportunities, etc.) terms.</p>	<p>WWF oasis in Italy: http://www.wwf.it/client/default_oasi.aspx</p> <p>Lipu oasis in Italy: http://www.lipu.it/oasi/default.asp</p> <p>4th National Report for the Convention on Biodiversity http://www.minambiente.it/home_it/menu.html?mp=/menu/menu_attivita/&m=argomenti.html#biodiver-sita_fa.html Convenzioni Protocolli Ratifiche htmlcbd.html</p> <p>Framework Program for the Forest Sector (PQSF) PQSF contents have been analysed, with special regard to the sector analysis summarised under the form of a SWOT Analysis matrix. http://www.reterurale.it/flex/cm/pages/ServeBLOB.php/L/IT/IDPagina/416</p>	
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	<p>Statistics on illicit and criminal actions infringing forest laws, and hydrogeological and landscape regulatory constraint for 2005 (i.e. the most recent available statistics) recorded a total number of 798 infringements occurring in parks, of which 169 criminally relevant. Center and South of Italy (in particular Toscana, Marche and Campania) are - in absolute terms - the more affected areas.</p> <p>2. World Bank Rule of Law Index</p> <p>According to ADVICE-40-005-14, included in FSC-DIR-40-005 (December 2010) compliance with indicator 3.2 can be demonstrated if a strong system of protection of high conservation values is in place. The definition of “strong” shall be based on the effectiveness of law enforcement in the country. This can be demonstrated through a high rating ($\geq 75\%$) in the World Bank “Rule of Law”. Considering the most recent version of such indicator, referred to 2009 and published in 2010, Italy ranges between 50% and 75% (see Annex 3, figure 2) i.e. below the reference threshold value defined by FSC.</p>	<p>ISTAT</p> <p>Illicit and criminal actions infringing forest laws, and hydrogeological and landscape regulatory constraint per type and region. http://www.istat.it/agricoltura/datiagri/foreste/elefor.html</p> <p>World Bank Rule of Law</p> <p>http://info.worldbank.org/governance/wqi/mc_chart.asp</p> <p>Rule of Law Indicator has been verified on the basis of figures reported at the previously mentioned web-link. For a better understanding and evaluation of the indicator, figures for Italy were also analysed in comparison to those referred to other European Countries, as well as on historical trends.</p> <p>With regard to 2009 figures Italy is European OECD member country with the lower World Bank Rule of Law Indicator. Considering also non-European countries, Italy ranges second-last. When considering the same indicator over time, it regularly results lower than 75% after 2000.</p>	
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Conclusions and some final remarks

As highlighted in the summary table below, results of the National Risk Assessment according to FSC requirements for Controlled Wood do not allow to classify Italy as “Low risk” for both the assessed Controlled Wood categories.

Controlled Wood categories	Risk level
1. Illegally harvested wood	Unspecified risk
3. Wood harvested in forests where high conservation values are threatened by management activities	Low Risk

It is to be remarked that the “unspecified risk” *status* is mainly the result of assessment against indicators (i.e. CPI and WB Rule of Law Index) defined at national scale. This means companies wishing to carry out their own Risk Assessment shall collect additional evidences at a lower scale if they want to show the wood and wood-based products they buy meet requirements for Controlled Wood.

On the basis of the feedbacks received from stakeholders, FSC-Italy considers the lack of sub-national (as well as forestry-sector specific) reference indicators as an action point to be discussed with FSC IC. It will also consider the opportunity to investigate ways of defining the CPI and the WB Rule of Law Index at a sub-national scale as well as with specific reference to forest operations.

In more general terms, FSC-Italy will develop a toolkit for companies wishing to carry out their own Risk Assessment at national level.

All interested parties are invited to continue submitting their comments on the National Risk Assessments. The Risk assessment will be kept up-to-date according to requirements from FSC IC and depending on the evolution of the national forest sector in the next years. No later than three years after the approval date, FSC-Italy will collate and review all the comments on the Risk Assessment and will take into account external circumstances and its continued relevance.



Annex 1 – Additional information on indicator 1.1

Region or autonomous province	Forest Law	Forest regulation	Harvesting procedure			Bodies in charge of ex-ante or ex-post verification		Specific measures to for protected areas	
			Coppice		High standing	State Forestry Corps (CFS)	Other	Presence of measures	Forest area under protection constrain/Total forest area
			Declaration	Authorisation	Authorisation				
Abruzzo	X		X (up to 1 ha)	X (approved harvesting project and stumpage mark)	-	X	X	X	47,35%
Basilicata	X	X	X (up to 5 ha)	X (harvesting project or technical report)	X (harvesting project or technical report)	X	X	X	21,96%
Calabria	X	-	X	X (technical report or forest improvement project)	X (technical report or forest improvement project)	X	X	X	23,92%
Campania	X	-	X	X	X	X	X	X	53,00%
E. Romagna	X		X	X	X	X	X	X	19,06%
F.V. Giulia	X	-	X	X	X	X	X	X	20,66%
Lazio	X	X	X up to 3 ha)	X (approved harvesting project and stumpage mark)	X (approved harvesting project and stumpage mark)	X	X	X	28,27%
Liguria	X	X	-	-	-	X	X	X	22,85%
Lombardia	X	X	X	X	X	X	X	X	22,57%
Marche	X		X (limited dimensions)	X	X	X	X	X	29,54%
Molise	X		-	X (approved harvesting project and stumpage mark)	X (if a forest management plan is not in place: harvesting project)	X	X	X	32,87%
Piemonte	X	X	X	X (harvesting project)	X (harvesting project)	X	X	X	11,46%



Region or autonomous province	Forest Law	Forest regulation	Harvesting procedure			Bodies in charge of ex-ante or ex-post verification		Specific measures to for protected areas	
			Coppice		High standing	State Forestry Corps (CFS)	Other	Presence of measures	Forest area under protection constrain/Total forest area
			Declaration (up to 5 ha)	Authorisation or technical report)	Authorisation or technical report)				
Puglia	X	X	X	X	X	X	X	X	54,64%
Sardegna	X		X	X	X	X	X	X	12,00%
Sicilia	X		X	X	X	X	X	X	42,81%
Toscana	X	X	X (up to 5 ha)	X	X	X	X	X	19,88%
Provincia Autonoma di Bolzano	X	-		X (forest parcel cards)	X	X	X	X	16,37%
Provincia Autonoma di Trento	X	X	X	X	X	X	X	X	21,09%
Umbria	X	X	X (up to 5 ha)	X (approved harvesting project and stumpage mark)	X (approved harvesting project and stumpage mark)	X	X	X	20,50%
Valle d'Aosta	X	-	X	X	X	X	X	X	6,18%
Veneto	X	X	X (up to 2,5 ha)	X (approved harvesting project, report check and stumpage mark)	X (approved harvesting project, report check and stumpage mark)	X	X	X	33,78%

NOTA: blank cell = not existing; - = information not available.

Sources: see indicator 1.1.



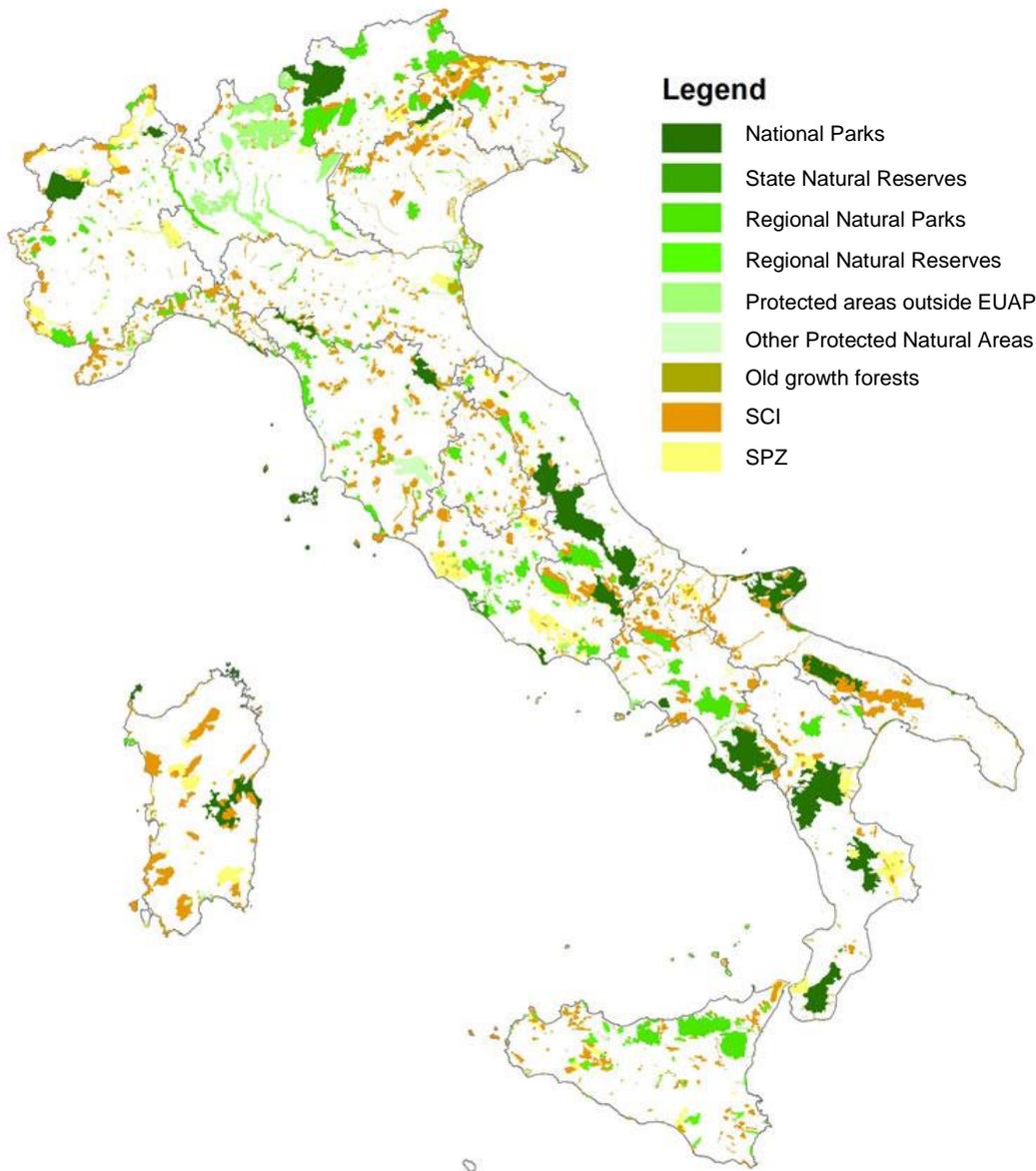
Annex 2 – Additional information on indicator 3.1

Table 1 – Italian regions hosting sites listed under ecoregions indicated in FSC-STD-40-005 v.2-1

#	Region	Conservation International Biodiversity Hotspots	WWF Global 200 Ecoregions	World Conservation Union (IUCN) Centre of Plant Diversity	Conservation International High Biodiversity Wilderness Area	World Resources Institute Frontier Forests	Greenpeace Intact Forests Landscapes
1	Abruzzo	X	X	X			
2	Basilicata	X	X	X			
3	Calabria	X	X	X			
4	Campania	X	X	X			
5	Emilia-Romagna	X	X	X			
6	Friuli-Venezia Giulia		X	X			
7	Lazio	X	X	X			
8	Liguria	X	X	X			
9	Lombardia		X	X			
10	Marche	X	X				
11	Molise	X	X				
12	Piemonte		X	X			
13	Puglia	X	X				
14	Sardegna	X	X	X			
15	Sicilia	X	X	X			
16	Toscana	X	X	X			
17	Trentino-Alto Adige		X				
	17a Provincia Autonoma di Trento		X	X			
	17b Provincia Autonoma di Bolzano		X	X			
18	Umbria		X	X			
19	Valle d'Aosta		X	X			
20	Veneto		X	X			

Annex 3 - Additional information on indicator 3.2

Figure 1 – Map of protected areas in Italy



Source: Maesano *et al.*, 2010.

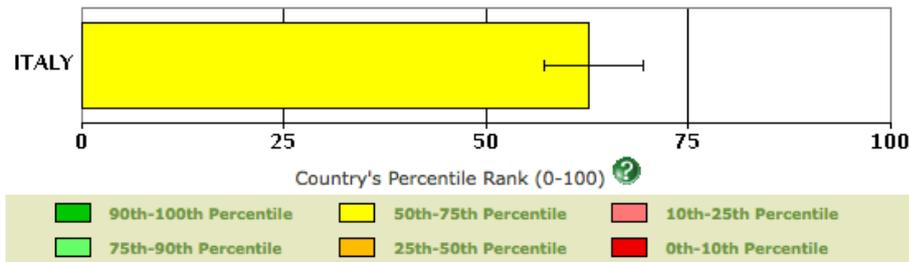
Figure 2 – 2009 World Bank Rule of Law Index for Italy



Rule of Law (2009)

The data on chart is sorted in descending order from top to bottom.

Comparison between 2009 (top-bottom order)



Source: Kaufmann D., Kraay, A., Mastruzzi, M. (2010). The Worldwide Governance Indicators: Methodology and Analytical Issues. World Bank Policy Research Working Paper No. 5430, pp. 31.