



Supply Base Report:

Baltania OÜ Re-assessment

Sustainable Biomass Program
sbp-cert.org



Completed in accordance with the Supply Base Report Template Version 2.2 and SBP Bridging Requirements for Meeting the Directive EU/2023/2413 (REDIII)

For further information on the SBP Framework and to view the full set of documentation see www.sbp-cert.org

Document history

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1 Overview

Producer name:	Baltania OÜ
Producer address:	Rassi tee 13, 48222 Vägari village, Põltsamaa parish, Jõgeva county, Estonia
SBP Certificate Code:	SBP-08-55
Geographic position:	58.953200, 26.191830
Primary contact:	Argo Tõnuri, +372 508 0144, a.tonuri@perpetualnext.com
Company website:	www.perpetualnext.com
Date report finalised:	15 Jul 2026
SBR reporting period from:	01 Jul 2025
SBR reporting period to:	30 Jun 2026
Name of the Certification Body:	Preferred by Nature OÜ
Certification Body Approval date:	27 Aug 2026
SBP Standard(s) used:	SBP Standard 2: Feedstock Verification v2.0, SBP Standard 4: Chain of Custody v2.0, SBP Standard 5: Collection and Communication of Data v2.0, Instruction Document 5E: Collection and Communication of Energy and Carbon data. v2.1, Instruction Document EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413 v2.0
Feedstock origin (countries)	Estonia (-)
Weblink to Standard(s) used:	https://sbp-cert.org/documents/standards-documents/standards

2 Description of the Biomass Producer and the Supply Base

2.1 Description of the company

Baltania plant is the first plant in the world designed to produce biocoal by carbonization on an industrial scale. Located in central Estonia in Vägari, produced the first high grade Perpetual Carbon in May 2021 utilizing our patented carbonization technology.

Today the company has not yet started full operation, as the plant is currently undergoing a technology upgrade. Nevertheless, the company promotes sustainable forest management from the very first purchases of raw material, because the mission of the company was to strive for FSC and SBP certification.

Besides SBP, Baltania OÜ holds FSC CoC certificate since 01.09.2021, certificate code is PBN-COC-054908 and PEFC CoC certificate no PBN-PEFC-COC-054908.

SBP feedstock is sourced from certified forests.

Products included in the scope of SBP Certification: WB 1.3 Torrefied pellets

Number of employees: 9

Annual maximum production capacity (metric tonnes): 160000

Number of direct feedstock suppliers: 15

Approximate number of feedstock sub-suppliers: 10

Description of the chain-of-custody and upstream supply chain:

Baltania buys feedstock directly from forest owners or logging companies who are selling the firewood transported to Baltania production unit.

The company sources feedstock from suppliers who operate under strict compliance with national laws and sustainability standards. SBP feedstock is sourced from certified forests.

Origin to felling site is always known and supported by documentation. All incoming and outgoing material is tracked through Woodpecker program that records each truck load's origin, volume, and end-point, providing complete traceability of feedstock movements.

Material is also physically reviewed by Baltania's workers before accepting it.

Material is usually bought in Baltania production unit and it is transported directly from forest (transport start and end point is visible on waybills).

After pellets are produced they are transported to Kuna port where they are shipped to customers.

Companies transporting the pellets are providing needed information of the transport distances and this info is recorded by Baltania. Transport distances can be verified from maps as well.

Baltania has full overview of the feedstock and pellets transportation starting from the forest until the sales point – risk of mixing with other materials is low.

2.2 Detailed description of the Supply Base

Guidance: Tables below have been generated automatically for each sourcing country based on the selection of 'Feedstock origin (countries)' in section 1 above.

Annex 1 is generated by the system if the SBP SBE is used without Regional Risk Assessment(s) (RRAs). In case RRA(s) is used, further details shall be given only in section 3 below.

Annex 2 is generated if EU RED SBE is in the scope for each country separately.

Country	Estonia
Area/Region	-
Exclusions	
Feedstock types	Primary feedstock
Feedstock Product Groups	Forest feedstock (1A)
Feedstock inputs	SBP Controlled feedstock
Is the forest managed to supply energy and non-energy markets?	Yes - Majority
For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?	Yes - Majority
Risk assessment(s)	N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme
Provide a concise summary of why a SBE was determined to be required or not required here:	
Baltania purchases only FSC- and PEFC-certified feedstock and does not implement its own SBP Supply Base Evaluation under SBP Standard 1. Therefore, a Supply Base Evaluation is not required.	
Feedstock types included in SBE:	N/A
Includes EU RED SBE:	Yes
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	No
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	2.3250
Map(s) of the Supply Base area:	



Source: Metsaportaál

2.3 Feedstock information

- a. **Total volume of Feedstock:** 1-200,000 m³
 b. **Volume of primary feedstock:** 1-200,000 m³
 c. **List of all the species in primary feedstock, including scientific name:**

Alnus glutinosa Black alder

Alnus incana Grey alder

- d. **Was the feedstock used in the biomass removed from a forest as part of a pest/disease control measure or a salvage operation?** Yes - Minority
Explanation: In Estonia some of the sanitary cutting is done due to spruce bark beetle attacks and storm damage.
- e. **Hardwood (i.e. broadleaf trees): specify proportion of feedstock from (%):** 100.00
- f. **Softwood (i.e. coniferous trees): specify proportion of feedstock from (%):** 0.00
- g. **Proportion of feedstock composed of or derived from saw logs by weight (%):** 0.00
- h. **Indicate how you determine the proportion of saw log:** Specification used by the sawmill closest to where the wood was grown.
- i. **Roundwood from fellings from forests with > 40 yr rotation times - Average % volume of fellings delivered to BP (%):** 100.00
- j. **Select forest type(s) where the primary feedstock was sourced from:** Mix of The Above
- k. **Select the main harvesting system(s) used for the sourced primary feedstock:** Mix of the above
- l. **Volume of primary feedstock from primary forest:** 0 m³
- m. **Volume of processing residues feedstock:** 0
Physical form of the feedstock: N/A
- n. **Share of SBP-recognised system claim for processing residues:**
- o. **Volume of post-consumer feedstock:** 0
Physical form of the feedstock: N/A
- p. **Estimated amount of EU RED-compliant sustainable feedstock that could be collected annually by the BP:** 500000 m³
- q. **What is the estimated amount of EU RED-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated):** 4000000.00 m³
Explanation: Felling rate is around 12 milj. Out of that approximately 1/3 is firewood and forest residues.

3 Supply Base Risk Assessments and Risk Management Measures

Guidance: Biomass Producers shall demonstrate that any specified risks of sourcing feedstock not in compliance with SBP Standard 1 have been adequately reduced to low risk, following Standard 2 requirements. Following section applies to Biomass Producer's implementing SBP Supply Base Evaluation (SBP RRA or company own risk assessment). EU RED Supply Base Evaluation details are reported in Annex 2.

☒ **Not Applicable – Supply Base Evaluation not implemented**

3.1 Summary of the Supply Base Evaluation

3.2 Conflicts with applicable national and sub-national legislation

3.3 Risk Management Measures

Guidance: Please provide more details about specified risk indicators in each supply country and describe mitigation measures taken to address all specified risks associated with indicators.

4 Stakeholder engagement

4.1 General description

Biomass Producer's stakeholder engagement start date: 18 Jul 2025

Biomass Producer's stakeholder engagement end date: 18 Aug 2025

Total number of stakeholders contacted: 9

Give a general description of the process of Stakeholders Engagement, including stakeholders contacted, method of communication and a summary of the comments received:

During the consultation, information about assessment and the SBR file was sent out to different stakeholders and stakeholder roof organizations. Different economic, social and environmental SH groups were covered.

See the full list from Annex 1 - Lisa 1 Huvigrupid.

All stakeholders were invited to comment SBR and risk mitigation means.

No comments or input was received from the stakeholders.

4.2 Response to stakeholder comments

5 Report updates and approval

This document is: New Supply Base Report (Assessments/reassessments)

Summary of changes: N/A

Name	Argo Tõnuri
Title	Management representative
Date of report approval	15 Jul 2026

Annex 1: Detailed findings for Supply Base Evaluation indicators

Annex 2: EU RED Supply Base Evaluation

Countries where EU RED Supply Base Evaluation is used	
Country	Estonia
Area	-
Sustainable harvesting criteria 29(6)	
(i) The legality of harvesting operations	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-EU-EE-FOR_v1.1 REDIII Level A for Estonia FOR
Level B management system at the level of the forest sourcing area	N/A
(ii) Forest regeneration of harvested areas	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-EU-EE-FOR_v1.1 REDIII Level A for Estonia FOR
Level B management system at the level of the forest sourcing area	N/A
(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grasslands, heathland and peatlands, are protected with the aim of preserving biodiversity and preventing habitat destruction, unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-EU-EE-FOR_v1.1 REDIII Level A for Estonia FOR
Level B management system at the level of the forest sourcing area	N/A
(iv) that harvesting is carried out considering the maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth forests as defined in the country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located, and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with requirements to use logging systems that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and habitats	

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Specific Risk description: Risk relates to sourcing roots and stumps, primary forests and old growth forests. a) company does not use roots and stumps in their biomass production. It is not common practice to remove roots and stumps during forest management activities but if such material is offered then it is not accepted for biomass production. b) company does not source material from forests that could be defined as primary or old growth forest. In Estonia, the OGF and primary forests are expected to be found within Woodland Key habitats (WKHs), Natura 2000 sites and other protected forests. Companes activities: The company purchases certified forest biomass only from approved certified suppliers and requires full traceability of every delivery to the forest compartment. Feedstock originating from Woodland Key Habitats (WKHs), Natura 2000 forest habitat types or other protected forests is not accepted. The company will use a list of approved suppliers, delivery documents, publicly available official databases and databases provided by competent authorities, FSC Estonia and expert reports, to verify that the delivered primary feedstock has not been sourced from protected areas. The company will carry out the following control procedure prior to the reception and registration of primary feedstock: Full origin data– felling permit, waybill, handover act - is collected and reviewed to make sure material is sourced legally. If some of the needed documentation is missing material can not be sourced. Origin information provided is verified via state registers (Forest registry, waybill database EVR, kinnisturaamat). Also Woodpecker software is used to create and monitor shipments and analyze every feedstock load to verify if there is any WKHs, Natura 2000 forest habitat types or other protected forests on the sourcing area. Additionally organization is conducting sample based field visits in sourcing areas before harvesting to identify whether compartment has WKH elements or not. The outcome of these control measures is to eliminate material from potential WKHs .

	Sampling rate used is $0,3 \times \text{SQRT}(\text{nr of FMUs})$. Each field visit will be protocolled. Sampling is taken from the whole nr of FMUS. Sampling rate is based on the FSC FM sampling requirements (FSC-STD-20-007 V4-0 EN). Also the same sampling rate is used in FSC CW DDS risk mitigation and this has been approved by those experts approving these risk mitigation measures. In case person doing the field visit identifies that the felling site classifies as WKH then the material will not be sourced from that compartment, if it does not qualify as WKH then material can be sourced from that compartment. Natura 2000 forest habitat types on Natura 2000 protection areas: Before issuing felling permit to Natura 2000 protection area, Estonian Environmental board is evaluating if there is Natura 2000 forest habitat type on that compartment or not. It is not allowed to issue felling permits to Natura 2000 forest habitat types any more. Since Environmental Board has Natura habitat experts doing the evaluation before issuing the felling permit, company needs to make sure that on Natura 2000 protection areas there is active felling permit available, meaning Environmental Board has made it clear that there is no Natura 2000 forest habitat on that compartment. The outcome of these control measures is to eliminate material from unidentified Natura 2000 forest habitats on Natura 2000 protection areas
(v) That harvesting maintains or improves the long-term production capacity of the forest.	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-EU-EE-FOR_v1.1 REDIII Level A for Estonia FOR
Level B management system at the level of the forest sourcing area	N/A
(vi)¹ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(a) primary forest and other wooded land and old growth forest, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located. If there is no definition of old growth forest at the national level, then the following definition shall apply: A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.</i>	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level

Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	**Specific Risk description:** Risk is related of sourcing material from primary forest and old growth forests. ** Companies Activities**: Company does not source material from forests that could be defined as primary or old growth forest. In Estonia, the OGF and primary forests are expected to be found within Woodland Key habitats (WKHs), Natura 2000 sites and other protected forests, so same risk mitigation activities are used as mentioned in **(iv) point b)**
(vi)² That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(b) highly biodiverse forest and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.</i>	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	**Specific Risk description:** Risk is related sourcing material from highly biodiverse forest, especially from WKHs and Natura 2000 forest habitats. **Companies Activities:** Same risk mitigation activities are used as mentioned in **(iv) point b)**
(vi)³ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(d) highly biodiverse grassland spanning more than one hectare that is: (i) natural, namely grassland that would remain grassland in the absence of human intervention and that maintains the natural species composition and ecological characteristics and processes; or (ii) non-natural, namely grassland that would cease to be grassland in the absence of human intervention and that is species-rich and not degraded and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the harvesting of the raw material is necessary to preserve its status as highly biodiverse grassland.</i>	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-EU-EE-FOR_v1.1 REDIII Level A for Estonia FOR
Level B management system at the level of the forest sourcing area	N/A
(vi)⁴ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under	

the same conditions of determination of the status of land specified in those paragraphs.

Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

*(e) **heathland** - Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).*

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	**Specific Risk description:** Risk of sourcing forest biomass from land classified as heathland under Article 29(3)(e). **Companies Activities**: The company applies a risk-based due diligence system to ensure that forest biomass is not sourced from highly biodiverse heathland as defined in Article 29(3)(e). The company's current sourcing is limited to low-value forest biomass originating from conventional forest management operations, including thinnings and final fellings. As highly biodiverse heathlands in Estonia are generally associated with protected open habitats rather than managed production forests, the likelihood of sourcing forest biomass from such areas is considered low. The origin of all forest biomass is verified through supplier documentation, harvesting documentation and identification of the harvesting site. Harvesting locations are checked against official Estonian environmental datasets, including the Estonian Nature Information System (EELIS), Natura 2000 datasets, protected area maps and other relevant official spatial information, where applicable. Commercial forest harvesting in Estonia is based on forest inventory data and the national forest notification procedure. These processes provide additional information on the harvesting site and support the identification of potential legal or environmental restrictions prior to harvesting. Where harvesting is planned within, or in close proximity to, protected areas or Natura 2000 sites where highly biodiverse heathland may occur, additional information is requested from the supplier to demonstrate that the harvesting has not taken place in highly biodiverse heathland or, where applicable, has not interfered with the conservation objectives of the protected habitat. If sufficient evidence cannot be obtained to demonstrate compliance with Article 29(3)(e), the material is not accepted. All verification activities and supporting documentation are retained as part of the company's due diligence system.

(vi)⁵ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.

*Article 29 (4): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status: (a) **wetlands**, namely land that is covered with or saturated by water permanently or for a significant part of the year (NOTE: Evidence of verification of wetlands should reflect seasonal changes within a year).*

Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-EU-EE-FOR_v1.1 REDIII Level A for Estonia FOR
Level B management system at the level of the forest sourcing area	N/A
(vi)⁶ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (5): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was peatland in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.</i>	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	**Specific Risk description:** Risk is related to sourcing biomass from undrained peatlands. **Companies Activities:** The company purchases certified forest biomass only from approved certified suppliers and requires full traceability of every delivery to the forest compartment. The Company does not source agricultural biomass or biomass related to peat mining areas.
(vii) that installations producing biomass fuels from forest biomass, issue a statement of assurance, underpinned by company-level internal processes, for the purpose of the audits conducted pursuant to Article 30(3), that the forest biomass is not sourced from the lands referred to in point (vi).	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	<i>Not applicable, requirement only applies to Level A</i>

LULUCF criteria 29(7)

Type of Risk Assessment used	☒ Level A – proof at national or sub-national level
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	☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-endorsed EU RED Level A risk assessment for Article 29(7) LULUCF_v1.4
Level B management system at the level of the forest sourcing area	N/A

Annex 2a: EU RED II Supply Base Evaluation

Annex 3: SBP Processing residues and/or Post-consumer feedstock requirements

☒ Not Applicable (Processing Residues and/or post-consumer feedstock not used)

Verification and monitoring of suppliers

N/A

Feedstock inspection and classification upon receipt

N/A

Supplier audit for processing residues and post-consumer feedstock

N/A

Annex 4: EU RED detailed findings for Trees Outside Forest (TOF) feedstock

NOTE: For “Trees outside forests (TOF) – Urban and landscape feedstock” no EU RED sustainability requirements apply, only the GHG savings criteria apply (SBP EU RED Bridging ID v2.0 Section 1.1). The land use category in this case is neither forest land nor agricultural land. For “Trees outside forests (TOF) – Agricultural land feedstock” the applicable criteria are Article 29 paragraphs (2)-(5).

Not Applicable (RED II TOF not included)

Annex 4a: RED II detailed findings for Trees Outside Forest (TOF) feedstock

NOTE: For “Trees outside forests (TOF) – Urban and landscape feedstock” no REDII sustainability requirements apply, only the GHG savings criteria apply (SBP REDII Bridging ID Section 4.2). The land use category in this case is neither forest land nor agricultural land. For “Trees outside forests (TOF) – Agricultural land feedstock” the applicable criteria are Article 29 paragraphs (2)-(5).