



Supply Base Report:

SIA Avoti Fourth Surveillance Audit

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:	SIA Avoti
Producer address:	Avoti Lizuma pagasts, LV-4425 Gulbenes novads, Latvia
SBP Certificate Code:	SBP-04-35
Geographic position:	57.189504, 26.369987
Primary contact:	Arita Apine, +371 644 711 80, arita.apine@avoti.lv
Company website:	www.avoti.lv
Date report finalised:	08 Jul 2026
SBR reporting period from:	01 Jun 2025
SBR reporting period to:	31 May 2026
Name of the Certification Body:	SCS Global Services
Certification Body Approval date:	24 Jul 2026
SBP Standard(s) used:	SBP Standard 1: Feedstock Compliance v2.0, 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 1A: SBP Requirements for Primary Feedstock from Trees Outside Forests (TOF) v1.0, Instruction Document 5E: Collection and Communication of Energy and Carbon Data v2.0, Instruction Document EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413 v2.0
Feedstock origin (countries)	Latvia (3.0600), Estonia (2.3300), Lithuania (2.2002)
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

AVOTI is woodworking company, which produces large volumes of solid wood furniture, as well as wood pellets. For SBP certification, operations are provided at pellets production unit and company's office. Both located in "Avoti", Lizums, Lizums parish, Gulbene municipality, Latvia, LV-4425.

Solid wood furniture production units located in:

- "Avoti", Lizums, Lizums parish, Gulbene municipality, Latvia, LV-4425;
- Vilakas street 14, Rezekne, Latvia, LV-4604.

Company also have implemented other certification systems:

- FSC CoC (Certificate No.SCS-COC-007596);
- PEFC CoC of Forest and Trees Based Products (Certificate No.BMCERT-PEFC-COC-00245);
- ISO 9001 (Certificate No.50321-2009-AQ-LVA-FINAS);
- ISO 14001 (Certificate No.66290-2009-AE-LVA-FINAS);
- ISO 50001 (Certificate No.249977-2017-AE-LVA-FINAS).

Products included in the scope of SBP Certification: *WB 1.1 Wood pellets*

Number of employees: 433

Annual maximum production capacity (metric tonnes): 120000

Number of direct feedstock suppliers: 14

Approximate number of feedstock sub-suppliers: 130

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

Feedstock purchased from state forests, private forests and other business owners:

- cuttings and roundwood from forest lands;
- logging residues from cuttings where logging was carried out;
- harvesting of overgrown areas in overgrown agricultural lands;
- materials from sawmills - production residues.

Feedstock transportation carried out mostly by transport of suppliers or supplier's service providers. AVOTI SIA transport also used for feedstock deliveries.

All operations starting from receiving of feedstock till ready pellets made on BP production site.

Transport service providers are used to transport the pellets to the port.

Two warehouses are rented for SBP pellets storage at the port.

The BP holds valid FSC CoC and PEFC CoC certificates and SBP certification is based on both.

All feedstock (both primary and secondary) is sourced as FSC/PEFC certified or FSC Controlled Wood/PEFC Controlled Sources.

After the reception, incoming feedstock is unloaded into piles according to type of feedstock and registered into the recordkeeping system.

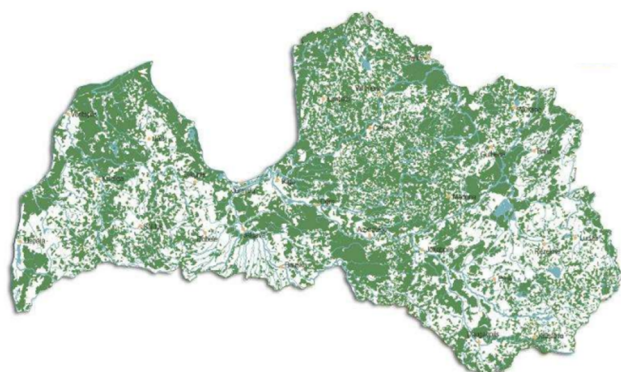
2.2 Detailed description of the Supply Base

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

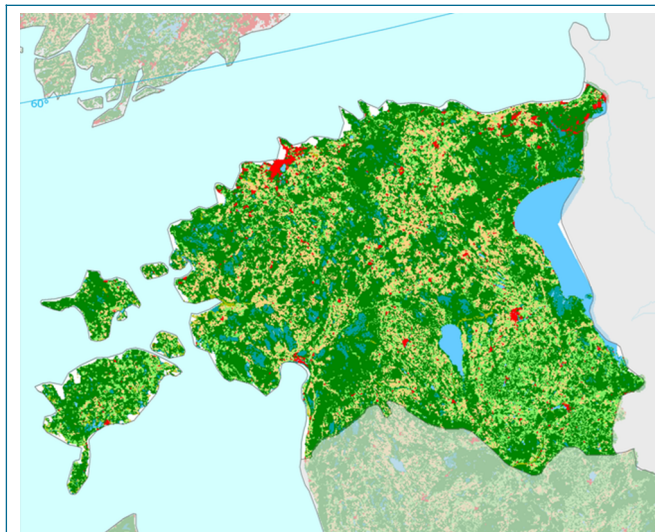
Annex 1 is generated by the system if the SBP SBE is used without Regional Risk Assessment(s) (RRAs). In case RRA(s) is used, further details shall be given only in section 3 below.

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

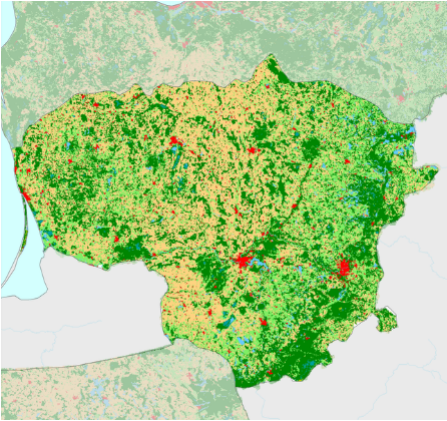
Country	Latvia
Area/Region	3.0600
Exclusions	
Feedstock types	Primary, Processing residues ¹
Feedstock Product Groups	Forest feedstock (1A), Trees outside forest (TOF) - Urban and landscape feedstock (2A), Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock , SBP Controlled feedstock, Non-eligible 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)	Yes – Regional Risk Assessment (RRA) used, 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:	
The decision was made to use SBE to expand the opportunity to sell larger volume of SBP certified products.	
Feedstock types included in SBE:	Primary
Includes EU RED SBE:	Yes
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	Yes
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	3.0600
Map(s) of the Supply Base area:	



Country	Estonia
Area/Region	2.3300
Exclusions	
Feedstock types	Processing residues ¹
Feedstock Product Groups	Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock , 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:	
SBE for material from Estonia is not necessary because volume is insignificant.	
Feedstock types included in SBE:	N/A
Includes EU RED SBE:	No
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):	2.3300
Map(s) of the Supply Base area:	



Country	Lithuania
Area/Region	2.2002
Exclusions	
Feedstock types	Processing residues ¹
Feedstock Product Groups	Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock , 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:	
SBE for material from Estonia is not necessary because volume is insignificant.	
Feedstock types included in SBE:	N/A
Includes EU RED SBE:	No
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):	2.2002
Map(s) of the Supply Base area:	
	

2.3 Feedstock information

- a. Total volume of Feedstock:** 200,000-400,000 tonnes
- b. Volume of primary feedstock:** 1-200,000 tonnes
- c. List of all the species in primary feedstock, including scientific name:**

Alnus glutinosa	Black alder
Alnus incana	Grey alder
Betula pendula	Silver birch
Betula pubescens	Downy birch
Fraxinus excelsior	Ash
Picea abies	Norway spruce
Pinus sylvestris	Scots pine
Populus tremula	Aspen
Quercus robur	Oak
Acer platanoides	Norway maple
Larix decidua	European larch
Prunus padus	Bird cherry
Salix caprea	Goat willow
Salix euxina	Crack willow
Sorbus aucuparia	Mountain ash
Tilia cordata	Littleleaf linden
Ulmus glabra	Scots elm
Ulmus laevis	European white elm

- 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: Every year in Latvia, sanitary felling is carried out in areas damaged by diseases or pests. There is a possibility that material from such locations may be included in the supply base chain. In 2020, a total of 50,000 ha of sanitary felling was carried out in Latvia. Such sanitary felling is carried out to avoid diseases or pests epidemic in forest areas.

- e. Hardwood (i.e. broadleaf trees): specify proportion of feedstock from (%):** 53.00
- f. Softwood (i.e. coniferous trees): specify proportion of feedstock from (%):** 47.00
- 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 issued by a body exercising functions of a public nature and issued for use by sawmills in the area in which the wood was grown.

i. Roundwood from fellings from forests with > 40 yr rotation times - Average % volume of fellings delivered to BP (%): 40.21

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: Clearcutting

l. Volume of primary feedstock from primary forest: 0

m. Volume of processing residues feedstock: 1-200,000 tonnes

Physical form of the feedstock: Chips, Sawdust

n. Share of SBP-recognised system claim for processing residues:

11 % FSC

89 % PEFC

o. Volume of post-consumer feedstock: 0

Physical form of the feedstock: Chips, Sawdust

p. Estimated amount of EU RED-compliant sustainable feedstock that could be collected annually by the BP: 90 %

q. What is the estimated amount of EU RED-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated): 180000.00 tonnes

Explanation:

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

SBP RRA has identified risks for 4 criteria.

All 4 criteria are simultaneously mitigated with the same risk mitigation measures - check in database "OZOLS" and with field audits using "High Value Element Identification checklist". The SBE system is correctly implemented and is being used in operation.

3.2 Conflicts with applicable national and sub-national legislation

There are no conflicts with national & 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.

Country: Latvia	
Area/sub-scope:	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☒ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.1.1 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.	

Description of the specific risk:
This risk was determined to be high in Latvia because no data were available on part of high-value forest areas. HCV monitoring has been performed in Latvia and HCV areas are displayed in the data management system "OZOLS". There is a risk that these areas are not yet protected by law, so cutting licenses may be legally obtained for felling operations. Also there can be found new protected bird species nests, that is not recognized and registered in data base "OZOLS". There is a risk that the favorable environment at the sites of protected birds will be disturbed and destroyed by logging actions.
Mitigation measure:
Identification of protected animal or plant habitat is carried out by using data base "OZOLS" and with field audits using "High Value Element Identification checklist".
Monitoring and outcomes:
Mitigation measures is audited during internal audit. Company uses approach that materials from such areas is not included in SBP supply chain. The performance of the risk mitigation measures taken and the preserved evidence were checked on a random basis. No nonconformities was found.

Country: Latvia
Area/sub-scope:
Risk Assessment used:
☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☒ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:
2.1.3 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.
Description of the specific risk:
This risk was determined to be high in Latvia because no data were available on part of high-value forest areas. HCV monitoring has been performed in Latvia and HCV areas are displayed in the data management system "OZOLS". There is a risk that these areas are not yet protected by law, so cutting licenses may be

legally obtained for felling operations.
Also there can be found new sites of cultural and historical value, that is not recognized and registered in data base "OZOLS". Data base <https://karte.mantojums.lv> contains registered cultural and historical sites and protection zone around them. There is a risk that the sites of cultural and historical will be destroyed by logging actions.

Mitigation measure:

Identification of high conservation biotopes, protected animal or plant habitat is carried out by using data base "OZOLS" and with field audits using "High Value Element Identification checklist".

Monitoring and outcomes:

Mitigation measures is audited during internal audit. Company uses approach that materials from such areas is not included in SBP supply chain. The performance of the risk mitigation measures taken and the preserved evidence were checked on a random basis. No nonconformities were found.

Country: Latvia

Area/sub-scope:

Risk Assessment used:

- ☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim
- ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim
- ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim
- ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed
- ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim
- ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed
- ☒ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed
- ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed
- ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim
- ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim
- ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim
- ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim
- ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim
- ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim
- ☐ Biomass Producer's own risk assessment

Indicator with specified risk:

3.2.3 feedstock shall not be sourced from forest areas in the Supply Base which, according to local definitions or norms, are classified as having combined attributes of high carbon stocks and high conservation value (HCV).

Description of the specific risk:

In the Latvian region, there are shortcomings in the safety requirements in the logging process, which is carried out with chainsaws. Cases of violations of occupational safety regulations in logging and accidents often occur.

Mitigation measure:

Identification of protected animal or plant habitat is carried out by using data base “OZOLS” and with field audits using “High Value Element Identification checklist”.

Monitoring and outcomes:

Mitigation measures is audited during internal audit. Company uses approach that materials from such areas is not included in SBP supply chain. The performance of the risk mitigation measures taken and the preserved evidence were checked on a random basis. No nonconformities were found.

Country: Latvia

Area/sub-scope:

Risk Assessment used:

- ☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim
- ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim
- ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim
- ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed
- ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim
- ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed
- ☒ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed
- ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed
- ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim
- ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim
- ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim
- ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim
- ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim
- ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim
- ☐ Biomass Producer's own risk assessment

Indicator with specified risk:

2.1.2 Threats to and impacts on the identified key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified and evaluated.

Description of the specific risk:

There is a risk that areas with protected species are not yet protected by law, so cutting licenses may be legally obtained for felling operations. Also there can be found new protected bird species nests, that is not recognized and registered in data base "OZOLS". There is a risk that the favourable environment at the sites of protected birds will be disturbed and destroyed by logging actions.

Mitigation measure:

Identification of protected animal or plant habitat is carried out by using data base “OZOLS” and with field audits using “High Value Element Identification checklist”.

Monitoring and outcomes:

Mitigation measures is audited during internal audit. Company uses approach that materials from such areas is not included in SBP supply chain. The performance of the risk mitigation measures taken and the

preserved evidence were checked on a random basis. No nonconformities were found.

4 Stakeholder engagement

4.1 General description

Biomass Producer's stakeholder engagement start date: 07 May 2025

Biomass Producer's stakeholder engagement end date: 07 Jun 2025

Total number of stakeholders contacted: 32

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

A summary of risk mitigation measures for documents (*SBP Revised Regional Risk Assessment for Latvia V2.0* (08.07.2024.) and *Instruction Document 1A: SBP Requirements for Primary Feedstock from Trees Outside Forests (TOF) V1.0* (16.03.2023.)) was prepared for stakeholders.

A stakeholder list with 32 members was prepared to whom these risk mitigation measures were sent.

Comment received from AS "Latvijas valsts meži".

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	Arnita Apine
Title	Report author
Date of report approval	08 Jul 2026

Name	Uldis Misins
Title	Management representative
Date of report approval	08 Jul 2026

Name	Janis Misins
Title	Management representative
Date of report approval	08 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	Latvia
Area	3.0600
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	Level A for Latvia by Ministry of Agriculture of the Republic of Latvia (RED III)
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	Level A for Latvia by Ministry of Agriculture of the Republic of Latvia (RED III)
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	Level A for Latvia by Ministry of Agriculture of the Republic of Latvia (RED III)
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	Level A for Latvia by Ministry of Agriculture of the Republic of Latvia (RED III)
Level B management system at the level of the forest sourcing area	N/A
(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	Level A for Latvia by Ministry of Agriculture of the Republic of Latvia (RED III)
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	Level A for Latvia by Ministry of Agriculture of the Republic of Latvia (RED III)
Level B management system at the level of the forest sourcing area	N/A
(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	Level A for Latvia by Ministry of Agriculture of the Republic of Latvia (RED III)

Level B management system at the level of the forest sourcing area	N/A
(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. 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: (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.	
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	Level A for Latvia by Ministry of Agriculture of the Republic of Latvia (RED III)
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	Level A for Latvia by Ministry of Agriculture of the Republic of Latvia (RED III)
Level B management system at the level of the forest sourcing area	N/A
(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	Level A for Latvia by Ministry of Agriculture of the Republic of Latvia (RED III)
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	Level A for Latvia by Ministry of Agriculture of the Republic of Latvia (RED III)
Level B management system at the level of the forest sourcing area	N/A
(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	Level A for Latvia by Ministry of Agriculture of the Republic of Latvia (RED III)
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 ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	Level A for Latvia by Ministry of Agriculture of the Republic of Latvia (RED III)
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

An agreement on compliance with EU RED is prepared for the supplier. The supplier's suitability can be assessed using a questionnaire prepared in accordance with EU RED requirements.

A system for EU RED conformity assessment has been established.

An agreement on compliance with EU RED is concluded with the suppliers.

The supplier's suitability is assessed using a questionnaire prepared in accordance with EU RED requirements.

Material from 12 suppliers used for certified product production.

For audit period the supplier's material has been assessed as EU RED compliant.

Feedstock inspection and classification upon receipt

When accepting the secondary material, it is assessed whether the material meets the requirements of the secondary material. AVOTI SIA do not use materials that are not from sawmills due to quality considerations.

For pellet production two main materials are used:

- sawdust;
- wood chips.

Pellets production requires material without bark, so it is continuously evaluated to keep the bark content as low as possible.

Supplier audit for processing residues and post-consumer feedstock

The audits was carried out for 12 suppliers (18 sawmills).

Inspections were made on site. No data or evidences that suppliers produce secondary feedstock from useful sawn timber or high quality round wood.

Audits were held for period - 01.06.2025.-31.05.2026.

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).

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).