# Supply Base Report:

## Granulita UAB
## Second 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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|---|---|
| **Version 1.0** | **Published 26 March 2015** |
| **Version 2.0** | Published 10 August 2023 |
| **Version 2.1** | Published 15 April 2024 |
| **Version 2.2** | Published 21 May 2025 |
| **Version 2.3** | Published 14 August 2025 |

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# 1 Overview

| | |
|---|---|
| **Producer name:** | Granulita UAB |
| **Producer address:** | Draugyste st. 41, LT-82293 Vainiunai, Lithuania |
| **SBP Certificate Code:** | SBP-10-86 |
| **Geographic position:** | 55.657935, 23.784460 |
| **Primary contact:** | Arūnas Norušas,<br>+370 652 737 93,<br>arunas@granulita.lt |
| **Company website:** | |
| **Date report finalised:** | 14 Sep 2026 |
| **SBR reporting period from:** | 01 Jun 2025 |
| **SBR reporting period to:** | 31 May 2026 |
| **Name of the Certification Body:** | Preferred by Nature OÜ |
| **Certification Body Approval date:** | 30 Sep 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 5E: Collection and Communication of Energy and Carbon 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 |
| **Feedstock origin (countries)** | Lithuania (All region) |
| **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

The company founded in 1980. The company has its own roundwood processing facility for the production of sawn timber for packaging. Roundwood is sourced from FSC-certified state forests and non - certified private forests in Lithuania. Wood residues from its own production are used for pellet production. In addition, wood chips and sawdust are purchased for pellet production.

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

**Number of employees:** *40*

**Annual maximum production capacity (metric tonnes):** *80000*

**Number of direct feedstock suppliers:** *20*

**Approximate number of feedstock sub-suppliers:** *0*

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

Purchase of low-quality roundwood after logging, chipping at a pellet production plant, and purchase of FSC-certified wood chips from certified sawmills as a by-product. Wood from forests is certified, but are used to mitigate SBE risks in accordance with the Lithuanian risk assessment. SBE applies to uncertified and certified forests that meet the requirements of SBP or SBP-controlled biomass.

## 2.2 Detailed description of the Supply Base

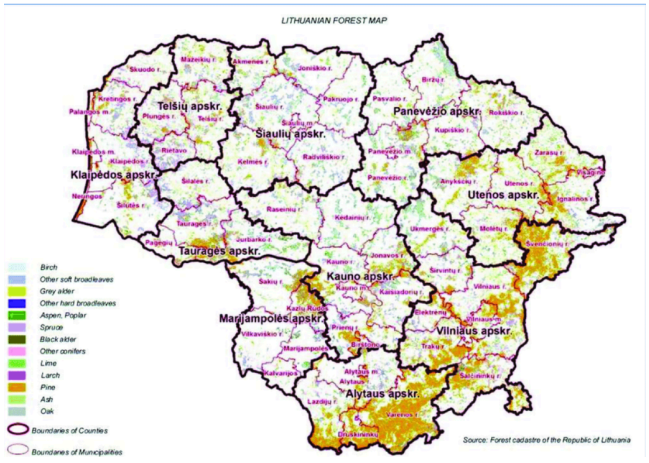
*Guidance: Tables below have been generated automatically for each sourcing country based on the selection of 'Feedstock origin (countries)' in section 1 above.*

*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** | Lithuania |
| **Area/Region** | All region |
| **Exclusions** | no |
| **Feedstock types** | Primary feedstock |
| **Feedstock Product Groups** | Forest feedstock (1A) |
| **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)** | 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:** | |
| Some of these are certified, while others are uncertified forest properties. SBE applies to uncertified forests that comply with SBP or are controlled in accordance with SBE. | |
| **Feedstock types included in SBE:** | Primary feedstock |
| **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):** | 2.2000 |
| **Map(s) of the Supply Base area:** | |



## 2.3 Feedstock information

a. **Total volume of Feedstock:** 1-200,000 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 |
| Picea abies | Norway spruce |
| Pinus sylvestris | Scots pine |
| Populus tremula | European aspen |
| Fraxinus excelsior | Common ash |
| Populus alba | White poplar |

d. **Was the feedstock used in the biomass removed from a forest as part of a pest/disease control measure or a salvage operation?** N/A
**Explanation:**

e. **Hardwood (i.e. broadleaf trees): specify proportion of feedstock from (%)**: 60.00

f. **Softwood (i.e. coniferous trees): specify proportion of feedstock from (%):** 40.00

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 (%):** 60.00

j. **Select forest type(s) where the primary feedstock was sourced from:** Other Naturally Regenerated Forest of Introduced Species

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

m. **Volume of processing residues feedstock:** 0
**Physical form of the feedstock:** N/A

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

80.00 % FSC certified

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:** 50000 tonnes

**q. What is the estimated amount of EU RED-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated):** 5000.00 tonnes

**Explanation**: The company collect and communicate reliable and verified data throughout the supply chain for the purpose of showing the compliance with REDIII requirements. .

# 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

SBE is applicable for feedstock sourced in Lithuania, includes: primary (off cuts, firewood, clearings from forest harvest areas ). The SBP endorsed risk assessment for Lithuania is used in evaluation process. 5 risks were identified as specified risks in Lithuania. The specified risks are reduced to low risk with the mitigation measures. Mitigation Measures described are applicable to primary feedstock.

## 3.2 Conflicts with applicable national and sub-national legislation

N/A

## 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:** Lithuania | |
| **Area/sub-scope:** All | |
| **Risk Assessment used:** | |
| | ☐SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim<br>☐SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim<br>☐SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim<br>☐SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed<br>☐SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim<br>☐SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed<br>☐SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed<br>☒SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed<br>☐SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim<br>☐SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim<br>☐SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim<br>☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim<br>☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim<br>☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim<br>☐ 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: |
|---|
| Some habitats of EU importance, particularly those located in private forests, (notably, Natura 2000 sites and WKHs) are not protected and thus their maintenance and enhancement are at risk. |
| **Mitigation measure:** |
| Feedstock purchased from State Forests falls into the low-risk sphere, as State Forests (State Forest Enterprises) are committed to protecting biodiversity by legislation (including WKH, Natura 2000) as well as by FSC Forest Management standard), and is therefore classified as low-risk. Private forest owners who sell raw material are in the higher risk area and are therefore controlled and monitored by the company on the basis of harvesting ticket data with origin and primary information (regional unit/forestry/quarter/parcel, plot) whether they (the owners) are ensuring the conservation of biodiversity. According to the initial information (felling ticket data), the raw material to be purchased from the private forest is checked in the databases (www.geoportal.lt ) for origin from places such as -WKH, NATURA-2000 sites, wetlands. This is done before the decision to buy raw material is taken. If it is determined that the raw material comes from WKH, NATURA-2000, the wetlands the Company makes a decision not to buy such raw material. |
| **Monitoring and outcomes:** |
| Once per year during the internal audit there will be carried out double check based on sample method of purchased material checking in database if the material didn't come from WKH, NATURA 2000 sites. The target is that no case should be found of material coming from WKH, NATURA 2000 sites. Before SBP main evaluation, the mitigation measures have been implemented and no one biomass sourcing unit from WKH, NATURA 2000 or form protective area had been identified. The monitoring program is the integrated part of the procedures related to internal audit. |

| | |
|---|---|
| **Country:** Lithuania | |
| **Area/sub-scope:** All | |
| **Risk Assessment used:** | |
| | ☐SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim<br>☐SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim<br>☐SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim<br>☐SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed<br>☐SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim<br>☐SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed<br>☐SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed<br>☒SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed<br>☐SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim<br>☐SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim<br>☐SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim<br>☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim<br>☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim<br>☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim<br>☐ Biomass Producer's own risk assessment |
| **Indicator with specified risk:** | |

| 2.2.2 Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced. |
|---|
| **Description of the specific risk:** |
| As analyzed in indicator 2.1.3, while it is evident that the majority of habitats of EU importance have a certain level of protection through their Natura 2000 status or voluntary protection by forest managers. However, a significant area of WKHs still have no legal protection at all. This is particularly true for private forests. The protection of WKHs (which are outside protected areas) in a private forest is not covered by any legislation and relies on a voluntary approach by private forest owners. On top of this, according to the National Audit Office of Lithuania (2022), the protection of rare, endangered or vulnerable habitats, plants and animals in all forests is not ensured. |
| **Mitigation measure:** |
| Feedstock purchased from State Forests falls into the low-risk sphere, as State Forests (State Forest Enterprises) are committed to protecting biodiversity by legislation (including WKH, Natura 2000) as well as by FSC Forest Management standard), and is therefore classified as low-risk. Private forest owners who sell raw material are in the higher risk area and are therefore controlled and monitored by the company on the basis of harvesting ticket data with origin and primary information (regional unit/forestry/quarter/parcel, plot) whether they (the owners) are ensuring the conservation of biodiversity. According to the initial information (felling ticket data), the raw material to be purchased from the private forest is checked in the databases (www.geoportal.lt ) for origin from places such as -WKH, NATURA-2000 sites, wetlands. This is done before the decision to buy raw material is taken. If it is determined that the raw material comes from WKH, NATURA-2000, the wetlands the Company makes a decision not to buy such raw material. |
| **Monitoring and outcomes:** |
| Once per year during the internal audit there will be carried out double check based on sample method of purchased material checking in database if the material didn't come from WKH, NATURA 2000 sites. The target is that no case should be found of material coming from WKH, NATURA 2000 sites. Before SBP main evaluation, the mitigation measures have been implemented and no one biomass sourcing unit from WKH, NATURA 2000 or form protective area had been identified. The monitoring program is the integrated part of the procedures related to internal audit. |

| | |
|---|---|
| **Country:** Lithuania | |
| **Area/sub-scope:** All | |
| **Risk Assessment used:** | |
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|---|---|
| | ☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim<br>☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim<br>☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim<br>☐ Biomass Producer's own risk assessment |

**Indicator with specified risk:**

3.2.2 Primary feedstock shall not be sourced from forest areas where site productivity is low and, according to local definitions or norms, the areas are classified as low-productive or difficult to regenerate.

**Description of the specific risk:**

It is stated in the approval of the methodology for setting the rate of main forest felling that mature conifer stands with site index (SI) Va or lower and mature deciduous stands with SI V or lower are excluded from the felling rate calculations i.e. they are not included in the fellings. The methodology is applied to state forests but private forest owners can harvest stands with any SI.A substantial portion of low-productive forest (such as wetland forests) is under some kind of protection regime ( e.g. they are included in the protected area network or representative area network).

**Mitigation measure:**

The raw material purchased from State Forests falls into the low-risk sphere, as the State Forests (State Forest Enterprise) do not include coniferous forest parcels of rating 5a and below, deciduous forest parcels of rating 5 and below, and swamps when planning their felling operations (the annual felling inventory). Therefore, such raw material is classified as low risk. Private forest owners who sell raw material are at higher risk and are therefore monitored by the company on the basis of the felling ticket data-primary information (regional unit/forestry/quarter/parcel) to ensure that the raw material does not originate from coniferous forest parcels of grade 5a and below, broadleaved forest parcels of grade 5 and below, and wetlands. specialist responsible for purchase must: - check site index (SI) of feedstock from non-certified forest Forest state cadaster map (VMT-GIS); - carry out risk assessment procedures and register all SBP suppliers in the register of qualified suppliers checklist regarding SBP manual procedure form; - carry out audits of suppliers on site in accordance with SBP manual procedure in case when properties that show signs of potential low productivity stands by verification questionnaires for the risk indicator in order to evaluate and obtain general information. If during this process it's determined that part of the feedstock doesn't meet SBP requirements, it will not be accepted and sold as SBP biomass.

**Monitoring and outcomes:**

Once per year during the internal audit there will be carried out in forest register double check based on sample method of purchased material checking that non-certified forest unit had been coming from conifer stands with site index (SI) Va or below and/or deciduous stands with SI V or below. The target is that no case should be found of material coming from SI related to low productivity. In addition during the internal audit there will be carried out the analyzes of suppliers on site audits, checking the effectiveness of such on site audits. The monitoring program is the integrated part of the procedures related to internal audit.

**Country:** Lithuania

**Area/sub-scope:** All

**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<br>☐SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim<br>☐SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed<br>☐SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim<br>☐SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed<br>☐SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed<br>☒SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed<br>☐SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim<br>☐SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim<br>☐SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim<br>☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim<br>☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim<br>☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim<br>☐ 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:** | |
| There is the risk that primary feedstock can be sourced from the territories with high carbon stocks and/or HCV that are not protected. It is considering high carbon socks is in wetlands, peatlands and old-growth forests. Currently, there is sufficient information concerning HCV forest location, key species, habitats and ecosystems pertaining to biodiversity. However, some of the key results were that forests and their natural values are not adequately protected, the forestry objectives set out in the strategic planning documents have not been met, and the designation of areas important for the conservation of the habitats is delayed. | |
| **Mitigation measure:** | |
| Raw material purchased from state forests falls into the low-risk sphere, as state forests (State Forest Enterprise) are committed to protecting biodiversity - they do not harvest timber from KBAs (scrub forest habitats), NATURA2000 sites, swamps, old-growth forests - and therefore such raw material is classified as low risk and is not monitored. Private forest owners who sell raw material are at higher risk and are therefore monitored by the company on the basis of the felling ticket data-primary information (regional unit/forestry/quarter/parcel) to see if they (the owners) do not cut timber from KMB (ceramic forest habitats), NATURA2000 sites, wetlands, old-growth forests. According to the initial information (felling ticket data), the raw material to be purchased from the private forest is checked in the databases (www.geoportal.lt ) for origin from places such as -WKH, NATURA-2000 sites, wetlands. This is done before the decision to buy raw material is taken. If it is determined that the raw material comes from WKH, NATURA-2000, the wetlands the Company makes a decision not to buy such raw material. See 3.2.2. description as well. | |
| **Monitoring and outcomes:** | |
| Once per year during the internal audit there will be carried out double check based on sample method of purchased material checking in database if the material didn't come from WKH, NATURA 2000 sites or protected territories such as peatland, wetlands and old-growth forest . The target is that no case should be found of material coming from above mentioned areas. Before SBP main evaluation, the mitigation measures have been implemented and no one biomass sourcing unit from WKH, NATURA 2000 or protected territories such as peatland, wetlands and old-growth forest. The monitoring program is the integrated part of the procedures related to internal audit. | |

| | |
|---|---|
| **Country:** Lithuania | |
| **Area/sub-scope:** All | |
| **Risk Assessment used:** | |
| | ☐SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim<br>☐SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim<br>☐SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim<br>☐SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed<br>☐SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim<br>☐SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed<br>☐SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed<br>☒SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed<br>☐SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim<br>☐SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim<br>☐SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim<br>☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim<br>☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim<br>☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim<br>☐ Biomass Producer's own risk assessment |
| **Indicator with specified risk:** | |
| 4.1.10 Safeguards shall be put in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures. | |
| **Description of the specific risk:** | |
| Occupational health and safety (OHS) services in enterprises are ensured by the employer, who may appoint one or more OHS specialists or establish an OHS service. In the absence of competent staff able to ensure all OHS service functions, the employer can hire external OHS services. Enterprises shall make a risk assessment on occupational health in line with the templates of the State Labour Inspectorate and take measures to mitigate the identified risks. Personal protective equipment shall be used when the risks cannot be avoided or sufficiently mitigated by technical means of collective protection or by measures, methods or procedures of work organisation. The employer shall provide protective equipment. Qualification requirements set for forestry enterprises and workers including their demonstration with a certificate contribute to workplace safety. Employers shall also provide regular training on workplace safety. The numbers for people working illegally (undeclared) in the forestry sector were not available but the figure for combined forestry, agriculture and fishery was 8% in 2021. The forestry sector in Lithuania is considered to be among the most dangerous sectors regarding work safety. The State Inspectorate annual report of 2022 (State Labour Inspectorate 2022) reported three cases of occupational diseases. Lethal accidents occur one to three times a year. The typical occupational diseases include vibration (45%), repetitive hand movements (22%), noise (16%), manual handling of loads (14%) and Lyme disease (3%) (2021 data). Within the EU forest sector, Lithuania is the country with the fourth highest risk concerning health and safety. Lithuania has a risk level of 3 / 100,000, while the highest in the EU is 3.5 / 100,000 employees. | |
| **Mitigation measure:** | |
| As the State Forest Enterprise is sufficiently good at ensuring the health and safety of workers (certified by FSC and controlled and monitored by CB as well as implement relevant measures), it is classified as low risk and is not subject to controls. Private forest owners selling raw material are at higher risk and are | |

| |
|---|
| therefore controlled by the company according to the procedures described in the SBP procedures. In order to mitigate the risk: specialist responsible for purchase shall: - collect information from suppliers about logging company and registers it in internal system; company's forestry specialist carries out work safety risk mitigation audit on site and checks if all occupational safety measures are in place. Company generates a list of wood harvesting companies and service providers separately in Lithuania in the system and performs audit under the formula X=0,8*√Y. Auditable areas and suppliers are selected so that supply region and a variety of contractors are maximally covered. when the potential feedstock to be bought/produced on site is identified, the owner of the material is contacted in order to identify the logging contractors or their subcontractors, who did or plan to do the harvesting. if any non-conformance is detected, shall be done re-audit. The same risk and mitigation measures are applied in FSC CW system. |
| **Monitoring and outcomes:** |
| The audits regarding occupational safety requirements in forest and out of forests operations are performed systematically regarding the list of wood harvesting companies. During a safety audit, the auditor assessed the safety requirements on the basis of a questionnaire. During the period before main assessment, no non conformities were identified. The same risk and mitigation measures are applied in FSC CW system. Once per year during the internal audit there will be carried out double check based on sample method the register of contractors, the analyzes of on site verifications. The monitoring program is the integrated part of the procedures related to internal audit. |

# 4 Stakeholder engagement

## 4.1 General description

**Biomass Producer's stakeholder engagement start date:** 01 May 2025

**Biomass Producer's stakeholder engagement end date:** 02 Jun 2025

**Total number of stakeholders contacted:** 40

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

The company has sent an e-mail notification and information to interested parties, with a total of 40 addressees. During the consultation, the management of the company communicates with experts in the identified risk categories to obtain information and recommendations to improve the risk mitigation system, ensuring that noncompliant biomass does not enter the SBP at the appropriate mass balance. During the auditing period no SBP material and production took place as well as no comments or request have been made by SH.

## 4.2 Response to stakeholder comments

**Stakeholder description:** No comments

**Stakeholder comment:** No comments

**Response to the stakeholder:** No comments

# 5 Report updates and approval

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

**Summary of changes:** N/A

| | |
|---|---|
| **Name** | Arūnas Norušas |
| **Title** | Management representative |
| **Date of report approval** | 14 Sep 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** | Lithuania |
| **Area** | All region |
| **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<br>☒ 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** | Considering FSC CW, previous RA for SURE and SBP RA there is no issues related to management system in Lithuania. |
| **(ii) Forest regeneration of harvested areas** | |
| **Type of Risk Assessment used** | ☐ Level A – proof at national or sub-national level<br>☒ 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** | Concerning requirement (ii), according to Article 15 of the Law on Forests, a manager, owner or user must regenerate a forest stand after felling or clearance by damage (e.g. fire, disease, wind and floods) from his or her resources. Regeneration may be completed artificially, naturally or as a combination of both means within three years of clearcutting. In the case of forest plantations, any part of the plantation lost or damaged must be replated within two years after the damage or loss. The Environmental Protection Department enforces the above rule and imposes a fine for non-compliance. |
| **(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<br>☒ 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** | The following wood is checked and not allowed to enter the company. No such areas are in supply based even considering the nature of feedstock.  |
| **(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** | |

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| **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<br>☒ 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** | The following wood is checked and not allowed to enter the company. No such areas are in supply based even considering the nature of feedstock. |
| **(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<br>☒ 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** | RED III (Directive (EU) 2023/2413) requires that **biomass used for energy** must come from forests managed in a way that **preserves or enhances the long-term productivity and carbon stock**.<br>Lithuania meets this through:<br>• National certification schemes (FSC).<br>• Legal restrictions on harvest intensity and replanting.<br>• Reporting under the **LULUCF sector** to ensure forest carbon sink is maintained. |
| **(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.**<br>*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:*<br>*(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.* | |
| **Type of Risk Assessment used** | ☐Level A – proof at national or sub-national level<br>☒Level B – management system at forest sourcing area level |
| **Level A risk assessment description** | N/A |

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| **Level B management system at the level of the forest sourcing area** | The following wood is checked and not allowed to enter the company. |
| **(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.**<br>*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:*<br>*(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.* | |
| **Type of Risk Assessment used** | ☐Level A – proof at national or sub-national level<br>☒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** | Company ensures that harvesting activities comply with sustainable forest management requirements relating to old grown forests, highly biodiverse forests, heathland, peatland, soil protection, biodiversity conservation, regeneration, and minimization of environmental impacts. Each harvesting site is verified using geoportal layers (for instance: forest cadaster, Natura 2000 and protected areas, peatlands, WKH and relevant environmental restrictions). Suppliers must provide legal harvesting permits that confirms with relevant requirements. Only feedstock that fully meets REDIII sustainability requirements and the control measures is accepted into the SBP mass balance. No cases of harvesting that resulted of non-compliance with national forest management rules were identified during the reporting period. |
| **(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.**<br>*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:*<br>*(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<br>☒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** | Company ensures that harvesting activities comply with sustainable forest management requirements relating to old grown forests, highly biodiverse forests, heathland, peatland, soil protection, biodiversity conservation, regeneration, and minimization of environmental impacts. Each harvesting site is verified using |

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| | geoportal layers (for instance: forest cadaster, Natura 2000 and protected areas, peatlands, WKH and relevant environmental restrictions). Suppliers must provide legal harvesting permits that confirms with relevant requirements. Only feedstock that fully meets REDIII sustainability requirements and the control measures is accepted into the SBP mass balance. No cases of harvesting that resulted of non-compliance with national forest management rules were identified during the reporting period. |
| **(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.**<br><br>*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:*<br>*(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<br>☒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** | Company ensures that harvesting activities comply with sustainable forest management requirements relating to old grown forests, highly biodiverse forests, heathland, peatland, soil protection, biodiversity conservation, regeneration, and minimization of environmental impacts. Each harvesting site is verified using geoportal layers (for instance: forest cadaster, Natura 2000 and protected areas, peatlands, WKH and relevant environmental restrictions). Suppliers must provide legal harvesting permits that confirms with relevant requirements. Only feedstock that fully meets REDIII sustainability requirements and the control measures is accepted into the SBP mass balance. No cases of harvesting that resulted of non-compliance with national forest management rules were identified during the reporting period. |
| **(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.**<br>*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:*<br>*(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<br>☒Level B – management system at forest sourcing area level |
| **Level A risk assessment description** | N/A |

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| **Level B management system at the level of the forest sourcing area** | Company ensures that harvesting activities comply with sustainable forest management requirements relating to old grown forests, highly biodiverse forests, heathland, peatland, soil protection, biodiversity conservation, regeneration, and minimization of environmental impacts. Each harvesting site is verified using geoportal layers (for instance: forest cadaster, Natura 2000 and protected areas, peatlands, WKH and relevant environmental restrictions). Suppliers must provide legal harvesting permits that confirms with relevant requirements. Only feedstock that fully meets REDIII sustainability requirements and the control measures is accepted into the SBP mass balance. No cases of harvesting that resulted of non-compliance with national forest management rules were identified during the reporting period. |
| **(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.**<br>*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.* | |
| **Type of Risk Assessment used** | ☐Level A – proof at national or sub-national level<br>☒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** | Company ensures that harvesting activities comply with sustainable forest management requirements relating to old grown forests, highly biodiverse forests, heathland, peatland, soil protection, biodiversity conservation, regeneration, and minimization of environmental impacts. Each harvesting site is verified using geoportal layers (for instance: forest cadaster, Natura 2000 and protected areas, peatlands, WKH and relevant environmental restrictions). Suppliers must provide legal harvesting permits that confirms with relevant requirements. Only feedstock that fully meets REDIII sustainability requirements and the control measures is accepted into the SBP mass balance. No cases of harvesting that resulted of non-compliance with national forest management rules were identified during the reporting period. |
| **(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<br>☐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** | *Not applicable, requirement only applies to Level A* |

| LULUCF criteria 29(7) | |
|---|---|
| **Type of Risk Assessment used** | ☐ Level A – proof at national or sub-national level<br>☒ 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** | Each Member State—including Lithuania—must follow a **linear trajectory from 2022 to 2030** starting from the historic baseline average (2021-2023 data) and culminating in its assigned national removal target by 2030 .<br>The national strategy's goals include a 70 % emissions reduction by 2030 and climate neutrality by 2050—both heavily reliant on carbon absorption by the LULUCF sector.<br>Around one-third of Lithuania's overall GHG emissions (excluding LULUCF) are balanced by removals in the land-use sector. |

## 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).*