



Supply Base Report:

Laskana-Mežs SIA 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:	Laskana-Mežs SIA
Producer address:	Brivostas str. 40, LV-3405 Liepāja, Latvia
SBP Certificate Code:	SBP-01-71
Geographic position:	56.529500, 20.999900
Primary contact:	Ojārs Zeme, +371 6342 3111, ojars.zeme@laskana.lv
Company website:	www.laskana.lv
Date report finalised:	27 Jan 2026
SBR reporting period from:	01 Jan 2025
SBR reporting period to:	31 Dec 2025
Name of the Certification Body:	Preferred by Nature OÜ
Certification Body Approval date:	06 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 (Latvia)
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 Latvia-Sweden joint venture “Laskana” was established in 1993 in the Liepāja Special Economic Zone, located in the western part of Latvia. At that time, the organisation’s main activity was timber export. Over the past 30 years, the organisation has grown significantly, investing in infrastructure development and improvement, acquiring various equipment and machinery, as well investing in personnel training and expanding its market reach and business directions.

The main lines of activity include:

- Transportation of timber
- Transportation of wood chips
- Ship agency services
- Stividor services
- Repair shop services.

SIA Laskana mežs materials are high-quality, sustainable and meet the requirements of various standards:

- Organization holds valid FSC chain of custody (SCS-COC-007770) and Controlled Wood (SCS COC-007770) certificates which covers procurement, storage and sales of fuelwood, round wood, bark, pulpwood, sawlogs and veneer wood.
- Organization also holds valid PEFC chain of custody (TT PEFC-COC161) certificate which covers procurement, storage and sales of fuelwood, round wood, bark, pulpwood, sawlogs and veneer wood.
- SIA Laskana mežs is also a wood pellet trader with EN PLUS certificate (LV 322).

Organisation is a wood chip producer and trader. The region of biomass origin is Latvia via direct purchase and supply.

The organisations primary feedstock of wood chip purchases are originating from Latvian forests.

Wood chips are also produced from different types of low quality wood and firewood delivered with FSC or PEFC claims and are verified according to the Sustainable Biomass Program (SBP).

The SBP certificate scope covers office in Liepāja harbour, wood chips production and storage facilities in the Liepāja harbour.

All feedstock is delivered to Liepāja port by trucks (Latvia), where the chips are stored and log chipping is taking place.

Export wood chips are transported with vessels from Liepāja port (FOB Liepāja). From Riga and Roja ports export is based on FOB Riga and FOB Roja Incoterms.

Products included in the scope of SBP Certification: *WB 2.1 Wood chips, WB 4.1 Roundwood*

Number of employees: 78

Annual maximum production capacity (metric tonnes): 200000

Number of direct feedstock suppliers: 18

Approximate number of feedstock sub-suppliers: 17

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

Most of SIA Laskana mežs biomass suppliers have long-term cooperation experience.

Biomass is delivered and purchased from ~18 suppliers.

SIA Laskana mežs suppliers supply primary biomass and post-processing biomass.

Biomass is obtained after logging and is produced from round timber and branch, a part of which is from our own FSC certified areas (According to data from the State Forest Service, the total area is 7223 ha).

Part of the supplied biomass is secondary material, which is defined as processing residues.

The company policy is directed at cooperation with certified supplier. In year 2019 company established differentiated prices for material purchase in Liepāja terminal, price is higher for FSC certified material. Volume of round timber chipping in port of Liepāja was very small during this reporting period, because more economically efficient was woodchip purchase. SIA Laskana mežs initiates and offers better supply conditions to SBP, FSC and PEFC certified suppliers and raises interest of non-certified round timber processors, as well as motivates forest owners to obtain certification.

The organization procures wood chips from suppliers certified under SBP, FSC, PEFC, and FSC Controlled Wood schemes. Wood chips are also produced from low-quality roundwood and firewood delivered as FSC or PEFC certified material. All certified biomass received from suppliers is verified in accordance with SBP requirements and the SBP-endorsed Regional Risk Assessment for Latvia. In addition, SBE material was used within the company's system during the reporting period.

All feedstock is delivered by truck to the port of Liepāja (Latvia), where the material is stored and log chipping operations are carried out.

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	Latvia
Exclusions	No
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
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, Yes – Biomass Producer's own risk assessment used (SBE) , 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:	
During this year, due to increased customer demand for SBP-compliant biomass, the company verified a portion of SBP material using the SBE system. Only primary biomass material is included in the system.	
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):	3.3100
Map(s) of the Supply Base area:	

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:**

Betula pendula	Birch
Betula pubescens	Birch
Populus tremula	Aspen
Picea abies	Spruce
Pinus sylvestris	Pine
Fraxinus excelsior	Ash
Alnus glutinosa	Black alder
Alnus incana	Grey alder
Tilia cordata	Linden
Quercus robur	Oak

- 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: Biomass is obtained from forests through both pest and disease control measures as well as salvage operations. Each year in Latvia, sanitary felling is carried out in areas affected by diseases or pests to prevent the spread of epidemics in forest ecosystems. In 2024, sanitary felling was conducted in 7,332 stands, covering a total area of 9,315 hectares, including 2,138,367 m³ of timber, which is also used for biomass production. The main objectives of these operations are to free up space for healthier and more valuable trees, promote faster and higher-quality growth of stronger trees, improve forest resilience to pests and diseases, and support biodiversity. Additionally, trees infested with bark beetles or affected by sudden oak death are removed to prevent further spread. Similarly, dead or dying trees damaged by wildfires, storms, or disease outbreaks are harvested for biomass production to prevent decay and promote the sustainable use of forest resources.

- e. **Hardwood (i.e. broadleaf trees): specify proportion of feedstock from (%):** 70.00
f. **Softwood (i.e. coniferous trees): specify proportion of feedstock from (%):** 30.00
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 (%):** 75.00
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
m. **Volume of processing residues feedstock:** 1-200,000 m³
Physical form of the feedstock: Chips
n. **Share of SBP-recognised system claim for processing residues:**

40 % FSC

60 % PEFC

o. Volume of post-consumer feedstock: 0

Physical form of the feedstock: Chips

p. Estimated amount of EU RED-compliant sustainable feedstock that could be collected annually by the BP: 50000 m³

q. What is the estimated amount of EU RED-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated): 500000.00 m³

Explanation: All biomass Volume meets EU RED-compliance biomass requirements, EU RED-compliance biomass assessment and approval system in place for secondary and primary biomass.

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

LSEZ Ltd LASKANA applied the Sustainable Biomass Program (SBP) Revised Regional Risk Assessment for Latvia, Version 2.0, with an effective date of 12 July 2024.

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: Latvia	
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 ☐ 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 classified as high in Latvia due to limited data on certain high-value forest areas. HCV monitoring has been conducted in Latvia, and HCV areas are mapped in the “OZOLS” data management system, which contains information on specially protected nature areas, micro-reserves, conservation measures for protected species and habitats, tourism infrastructure in protected areas, restrictions on economic activities in protected zones, the State Register of cartographic data, biodiversity monitoring data, and other relevant environmental information. However, some areas may not yet have legal protection, meaning cutting licenses could still be issued. Additionally, new nests of protected bird species may be discovered that are not yet recorded in the “OZOLS” database. This creates a risk that favorable conditions for protected bird species in these areas could be disturbed or destroyed by logging activities.

LSEZ Ltd LASKANA applied the Sustainable Biomass Program (SBP) Revised Regional Risk Assessment for Latvia, Version 2.0, with an effective date of 12 July 2024. See risk description in the Regional Risk Assessment for Latvia: <https://sbpcert.org/documents/consultation-documents/archive/revised-rra-latvia/>

Mitigation measure:

LSEZ Ltd LASKANA identifies HCV Category 1 areas and, if necessary, conducts a compliance assessment, with or without expert consultation.

Upon receiving a feedstock load, a specialist checks the “Ozols” database and verifies the feedstock origin data together with the Felling Permit. Loads without a Felling Permit are not accepted. To ensure accurate origin data, the Cadastre Number is required for each sourced load or logging site, and it is verified using the Felling Permits and purchase agreements.

If the feedstock origin data indicates a habitat of rare, threatened, or protected species, an onsite inspection is conducted to ensure the habitat has been preserved, is not damaged, and that the supplier has adhered to responsible logging practices. Expert opinions are sought if necessary.

Feedstock is accepted as SBP-compliant only after HCV 1 risks have been mitigated. As part of the risk mitigation process, the supplier self-declaration and the completion of the “Data for Tree Origin, Legality, and Specimen” form are required.

Trees Outside Forests (TOF 2A): The Biomass Producer (BP) has developed a risk assessment for feedstock sourced from non-forest lands, in accordance with the requirements of SBP Standard 2 and Instruction Document 1A. Regarding non-forest feedstock, the same indicators identified as “specified risk” for forest-derived feedstock have been assigned the same status. Accordingly, identical mitigation measures are applied to these indicators.

Monitoring and outcomes:

The effectiveness of risk mitigation measures is monitored through a combination of internal audits, field inspections, and verification of supplier documentation. LSEZ Ltd LASKANA performs internal audits once every 12 months within the FSC, PEFC, and SBP systems to assess compliance with the established risk mitigation procedures and the effectiveness of mitigation measures.

During the reporting period, field inspections included 10 forest properties before or after logging and 3 wood chip producers after processing. The verification process included checking the Felling Permits against the “Ozols” database, inspecting for rare, threatened, or endangered species habitats, large bird nests (over 50 cm), trees with a diameter exceeding 80 cm at breast height, and other potentially biologically valuable features.

Outcomes of mitigation measures and monitoring:

- No cases of biomass sourced from potentially biologically valuable stands, species, ecosystems, or areas with significant biodiversity and high carbon stock were identified.
- No HCV presence was detected at the raw material origin locations specified in the Felling Permits.
- Suppliers demonstrated an understanding of the importance of preserving valuable habitats,

species, ecosystems, and biodiversity, and adhered to forest conservation requirements, including leaving deadwood and ecological trees.

- No complaints or objections were received regarding the verification process, confirming its effectiveness.
- All suppliers provided signed self-declarations and completed “Data for Tree Origin, Legality, and Tree Species” forms, ensuring traceability and compliance.

These results confirm that the implemented mitigation measures are effective in maintaining a low risk level and ensuring that biomass sourcing complies with SBP requirements. Continuous monitoring and internal audits ensure that suppliers remain compliant and that risks are promptly identified and addressed.

Country: Latvia

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
- ☐ 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:

This risk is classified as high in Latvia due to insufficient data availability and incomplete documentation regarding specific High Conservation Value (HCV) forest areas. While HCV monitoring has been conducted and identified areas are recorded in the “OZOLS” data management system—an integrated tool containing information on specially protected nature territories, micro-reserves, conservation measures for protected species and habitats, tourism infrastructure, restrictions on economic activities, cartographic data from the State Register, biodiversity monitoring, and other relevant conservation information—gaps remain that may result in potential environmental risks.

Key risks include:

- Some HCV areas may lack formal legal protection, which could allow logging permits to be issued, potentially resulting in damage to ecologically valuable sites.
- Nests of protected bird species or other sensitive habitats may exist in areas not yet identified or registered within the “OZOLS” database. This increases the likelihood that these habitats could be disturbed or destroyed before appropriate conservation measures are implemented.
- Limited availability of species-specific data may reduce the ability to fully assess and mitigate risks associated with HCV areas.

As a result, forest conservation in Latvia faces challenges including incomplete species and habitat data, insufficient legal protection for certain HCV areas, and potential conflicts between commercial forestry activities and biodiversity preservation objectives. Effective monitoring, field verification, and application of risk mitigation measures are essential to reduce these risks and ensure responsible biomass sourcing.

LSEZ Ltd LASKANA applied Sustainable Biomass Program (SBP) Revised Regional Risk Assessment for Latvia Version 2.0 Effective date: 12 July 2024.

See risk description in the Regional Risk Assessment for Latvia: <https://sbpcert.org/documents/consultation-documents/archive/revised-rra-latvia/>

Mitigation measure:

LSEZ Ltd LASKANA identifies potentially biologically valuable forest areas and other HCV 2.1.2 risk sites, and, if necessary, conducts a compliance assessment with or without expert consultation.

Upon receiving a feedstock load, a specialist verifies the origin using the “Ozols” database together with the Felling Permit. Loads without a valid Felling Permit are not accepted. To ensure accurate and reliable origin data, the Cadastre Number for each sourced load or logging site is required and verified using Felling Permits and purchase agreements. This ensures that feedstock origin is fully documented and traceable.

Information sources used to mitigate the risk include: the “Ozols” database; field inspections (including assessment of large bird nests, distances, cultural and historical objects, and trees with a diameter greater than 80 cm at breast height, with observations recorded in “Ozols” printouts); monitoring records; interviews with supplier staff and stakeholders; expert consultations; species protection plans and maps; regional and publicly available data from trusted third parties; environmental NGO reports and maps; websites of the State Forest Service, Nature Conservation Agency, and EU agencies; and relevant Latvian and EU legislation. All data are fully documented.

If the origin data indicates a habitat of rare, threatened, or endangered species or other sensitive biotopes, an onsite inspection is conducted to ensure the habitat is preserved, not impacted by forest management, and that the supplier has adhered to responsible logging practices. Expert opinions are obtained if necessary.

Feedstock is accepted as SBP-compliant only after HCV 2.1.2 risks have been mitigated. As part of the risk mitigation process, suppliers are required to sign a self-declaration and complete the “Data for Tree Origin, Legality, and Specimen” form. This ensures timely identification and mitigation of risks associated with non-compliant SBP supplies and raw materials.

Training and seminars are provided to company employees and biomass suppliers to ensure they can identify potential biotopes, bird nesting sites, and cultural or historical objects, while fully complying with work safety requirements within LSEZ Ltd LASKANA and the service

providers' companies.

Trees Outside Forests (TOF 2A): Mitigation measures for feedstock sourced from non-forest lands are identical to those applied to forest lands. Every load of primary feedstock, regardless of its FSC or PEFC certification status, is cross-checked against the national nature data management system "Ozols" to verify the absence of protected habitats or species. Feedstock from non-forest areas with High Conservation Value (HCV) is only accepted following a thorough assessment, ensuring that the HCV values remain unaffected (e.g., by preserving key landscape elements or habitat trees).

Monitoring and outcomes:

LSEZ Ltd LASKANA monitors the effectiveness of HCV 2.1.2 risk mitigation measures through verification of feedstock origin using the "Ozols" database, field inspections, supplier documentation, and audits. Supplier self-declarations and completed "Data for Tree Origin, Legality, and Tree Species" forms ensure traceability and compliance with SBP requirements.

During the reporting period:

- 10 forest properties and 3 wood chip producers were inspected.
- No biomass was sourced from potentially biologically valuable stands, species, ecosystems, or areas with high biodiversity or carbon stock.
- No large bird nests or trees exceeding 80 cm in diameter at breast height were observed.
- No HCV 2.1.2 presence was identified at the origin locations specified in the Felling Permits.

These outcomes confirm that risk mitigation measures are effective, ensuring low risk. Suppliers understand the importance of preserving valuable habitats and biodiversity, and logging companies comply with requirements such as leaving deadwood and ecological trees. No complaints or objections regarding the risk verification process were received.

Internal audits are conducted annually to verify the effectiveness of risk mitigation measures and supplier compliance within FSC, PEFC, and SBP systems. During the reporting period, no biomass deliveries were rejected due to HCV presence at the raw material origin.

Country: Latvia

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
- ☐ 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 is classified as high in Latvia due to limited availability of data on specific High Conservation Value (HCV) forest areas. Although HCV monitoring has been conducted, and identified areas are recorded in the “Ozols” data management system—an integrated natural data tool containing information on specially protected nature territories, micro-reserves, conservation measures for protected species and habitats, tourism infrastructure, restrictions on economic activities, cartographic data from the State Register, biodiversity monitoring, and other relevant conservation details—significant risks remain. A key risk arises from the fact that some HCV areas may lack formal legal protection, meaning logging permits could still be issued, potentially impacting these ecologically valuable sites. Additionally, nests of protected bird species or other sensitive habitats may exist in areas not yet identified or registered in the “Ozols” database. This creates the possibility that these habitats could be disturbed or destroyed before appropriate conservation measures are implemented. In conclusion, forest conservation in Latvia faces notable challenges, including incomplete species data, insufficient legal protection for some HCV areas, and potential conflicts between biodiversity conservation objectives and commercial forestry operations. LSEZ Ltd LASKANA applies the Sustainable Biomass Program (SBP) Revised Regional Risk Assessment for Latvia, Version 2.0, effective 12 July 2024, to identify, manage, and mitigate these risks in its feedstock sourcing. See risk description in the Regional Risk Assessment for Latvia: https://sbpcert.org/documents/consultation-documents/archive/revised-rra-latvia/	
Mitigation measure:	
LSEZ Ltd LASKANA identifies the locations of HCV Category 3 areas and, if necessary, conducts a compliance assessment with or without expert consultation to ensure the protection of sensitive species and habitats. Upon receiving a biomass load, a company specialist verifies the feedstock origin data against the Felling Permit and checks the “Ozols” database. Loads without a valid Felling Permit are not accepted. To ensure accurate and reliable origin data, the organization requires the Cadastre Number for each sourced load or logging site, which is verified using information from Felling Permits and purchase agreements. This process ensures that feedstock origin is fully documented and traceable. The following sources are used to assess and mitigate HCV 2.1.3 risks: the “Ozols” database, field inspections (including assessment of sensitive species habitats, large bird nests, distances, cultural and historical objects, and trees over 80 cm in diameter at breast height, with observations recorded in the “Ozols” database printout), monitoring records, interviews with supplier staff and stakeholders, consultation with experts, species protection plans and maps, regional and publicly available data from trusted third parties, environmental NGO reports and maps, and relevant websites of the State Forest Service, Nature Conservation Agency, EU agencies, as well as applicable Latvian and EU legislation. All data are documented.	

If a habitat of a rare, threatened, or endangered species is identified in the feedstock origin, an onsite inspection is conducted to ensure the habitat is preserved according to legal requirements, has not been damaged by forest management activities, and that the supplier has considered the species' specific needs and followed responsible logging practices. Expert opinions are sought if necessary. Biomass is accepted as SBP-compliant only if HCV 3 risks have been mitigated.

As part of the risk mitigation process defined in the organization's procedures in accordance with SBP standards, suppliers are required to sign a self-declaration and complete the "Data for Tree Origin, Legality, and Specimen" form. This ensures timely identification and reduction of risks related to non-compliant SBP feedstock.

Trainings and seminars are provided to company employees and biomass suppliers to ensure that involved parties can identify potential sensitive habitats, species-specific biotopes, nesting sites, and cultural or historical objects, while fully complying with work safety requirements at LSEZ Ltd LASKANA and the service providers' companies.

Trees Outside Forests (TOF 2A): Analogous mitigation measures are applied to feedstock sourced from non-forest lands. Each load of primary feedstock, regardless of its FSC or PEFC certification status, is verified using the national nature data management system "Ozols". Feedstock from non-forest areas with High Conservation Value (HCV) may be accepted only if it is ensured that the HCV values are preserved and remain unaffected.

Monitoring and outcomes:

LSEZ Ltd LASKANA monitors the effectiveness of HCV 2.1.3 risk mitigation measures through verification of feedstock origin using the "Ozols" database, field inspections, supplier documentation, and audits. Supplier self-declarations and completed "Data for Tree Origin, Legality, and Tree Species" forms ensure traceability and compliance with SBP requirements.

During the reporting period:

- 10 forest properties and 3 wood chip producers were inspected.
- No biomass was sourced from areas identified as habitats of rare, threatened, or endangered species or other sensitive biotopes.
- No signs of species-specific habitats (e.g., large bird nests or protected plant species) were observed in the inspected areas.
- No HCV 2.1.3 presence was identified at the raw material origin locations specified in the Felling Permits.

These outcomes confirm that risk mitigation measures are effective, maintaining a low level of risk. Suppliers understand the importance of preserving sensitive habitats and species, and logging companies comply with conservation requirements, including leaving deadwood and ecological trees. No complaints or objections regarding the risk verification process were received.

Internal audits are conducted annually to verify the effectiveness of risk mitigation measures and supplier compliance within FSC, PEFC, and SBP systems. During the reporting period, no biomass deliveries were rejected due to HCV presence at the raw material origin.

Country: Latvia

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 ☐ 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:	
This risk relates to cases where primary feedstock is sourced from forest areas that are both High Conservation Value (HCV) areas and contain High Carbon Stock (HCS). In the Latvian National Risk Assessment (SBP Latvia National Risk Assessment, Version 2.0), this indicator is assessed as a specified risk because: • some forest areas potentially containing both HCV and HCS characteristics are not fully mapped or identified; • sourcing primary feedstock from these areas could negatively impact ecosystem structure, carbon stock preservation, and biodiversity; • there is a risk that forestry operations may take place in areas of high ecological value and carbon stock if appropriate monitoring and assessment mechanisms are not in place. LSEZ Ltd LASKANA applies the Sustainable Biomass Program (SBP) Revised Regional Risk Assessment for Latvia, Version 2.0, effective 12 July 2024, to identify, manage, and mitigate these risks in its feedstock sourcing. See risk description in the Regional Risk Assessment for Latvia: https://sbpcert.org/documents/consultation-documents/archive/revised-rra-latvia/	
Mitigation measure:	
Priority of certified wood procurement: FSC and PEFC certified wood is prioritized for SBP-compliant biomass procurement. Supplier self-declarations and origin documentation: Each supplier provides a signed self-declaration and the "Data for Tree Origin, Legality, and Species" form, ensuring documented evidence of legal origin and compliance with SBP requirements. HCV and HCS site identification: The organization identifies HCV areas and key High Carbon Stock (HCS) site categories:	

- Biologically old and overmature forests: stands with significant carbon stored in tree biomass and soil, identified by age class and dominant tree species. Biomass harvesting in these areas may pose a higher risk of carbon stock reduction.
- Wetlands and peatlands: areas where carbon stock preservation is critical to prevent CO₂ emissions. Verification is based on felling permits and State Forest Service documentation confirming compliance with regulatory restrictions.

Risk mitigation measures:

- Biomass from HCV and HCS areas is not accepted if risks cannot be mitigated.
- Expert consultation or on-site audits are conducted when necessary.
- Suppliers are informed of the requirement to follow responsible forestry practices and to preserve protected species and habitats.

Verification and audits:

- Regular verification of biomass origin and internal audits ensure that HCV and HCS risks are effectively mitigated.
- Suppliers receive training on HCV/HCS identification and sustainable biomass procurement.

Exclusion: If identified HCV or HCS risks cannot be effectively managed, the relevant material or supplier is excluded from the SBP supply base.

Monitoring and outcomes:

LSEZ Ltd LASKANA monitors the effectiveness of risk mitigation measures through a combination of supplier documentation, field verifications, and internal audits.

Supplier documentation and verification: All suppliers provide signed self-declarations and “Data for Tree Origin, Legality, and Species” forms. Before accepting biomass, the organization verifies the origin using felling permits and the “Ozols” database to ensure that material is not sourced from HCV or High Carbon Stock (HCS) areas.

Internal audits and field inspections: During the reporting period, the organization conducted internal audits including the review and analysis of HCS areas. These audits examined the forest management units from which biomass was sourced to confirm that no material originated from identified biologically old, overmature forests, wetlands, or peatlands.

Audit findings:

- No biomass was sourced from areas classified as HCS.
- No conflicts with HCV or HCS conservation objectives were identified.
- Suppliers demonstrated understanding and compliance with responsible forestry practices, including preserving high-value habitats and avoiding harvesting in sensitive areas.

Conclusion: The audit and verification process confirms that the mitigation measures for HCV and HCS risks are effective. Biomass supplied to LSEZ Ltd LASKANA originates from areas with low risk, and no material from HCS sites was included. Continuous monitoring, supplier engagement, and internal audits ensure the ongoing effectiveness of risk mitigation measures.

4 Stakeholder engagement

4.1 General description

Biomass Producer's stakeholder engagement start date: 12 Sep 2025

Biomass Producer's stakeholder engagement end date: 12 Oct 2025

Total number of stakeholders contacted: 73

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

The organisation has published the SBP Supply Base Report, which is available on the organisation's website: <https://laskana.lv/iepirkumi/iepirkumi-ostas/>

The prepared SBP Supply Base Report has been developed in accordance with the SBP Standard and the EU RED guidance document. In line with the established procedure, an electronic informative letter was sent to the interested parties.

The list of interested parties was created to ensure comprehensive representation, including institutions and organisations representing the economic, social, and environmental interests of society, as well as local municipalities. The total number of recipients of the letter is 73.

All stakeholder comments were reviewed and systematically taken into account in the SBE process. The feedback helped update internal procedures, ensuring that forest biomass sourcing and use comply with RED III sustainability criteria and that monitoring, enforcement, and documentation processes are robust, transparent, and in accordance with the requirements.

In addition, stakeholder comments were also taken into account in the development of the SBP Supply Base Risk Assessment for wood sourced from non-forest land in Latvia. This applies to wood obtained outside forests (Trees Outside Forest – TOF), as well as Urban and Landscape feedstock

4.2 Response to stakeholder comments

Stakeholder description: Vita Rudzīte Certification Systems Manager at PATA Group SIA PATA is the biomass supplier for LSEZ SIA LASKANA

Stakeholder comment: LSEZ SIA Laskana has developed a comprehensive and robust risk mitigation program to ensure that energy biomass complies with RED III sustainability requirements. The measures include the use of the OZOLS database, on-site inspections, involvement of industry experts, as well as informing suppliers and stakeholders. LSEZ SIA Laskana has implemented a full set of measures to guarantee that the produced energy biomass fully complies with the requirements of the RED III Directive.

Response to the stakeholder: Thank you for your message. LSEZ SIA Laskana has developed a comprehensive and robust risk mitigation program to ensure that energy biomass supplied and produced by our company fully complies with the sustainability requirements of the EU RED Directive.

Stakeholder description: Ieva Medne Latvian Biomass Association LATbio

Stakeholder comment: Currently, RED has not been fully transposed into Latvian legislation. It is divided into three parts. Amendments to the Cabinet of Ministers Regulation No. 686 of 2 November 2022 "Regulations on sustainability and greenhouse gas emission savings criteria, criteria for electricity produced from biomass fuel, and the procedure for substantiating, certifying, and monitoring compliance with the mentioned criteria." These amendments are currently published in the TAP portal but have not yet entered into force. The Energy Law – has entered into force. The Transport Energy Law – currently in the 3rd reading in the Saeima, amendments have not yet entered into force. For RED III to be fully transposed, both the law and the Cabinet regulations must enter into force. When this will happen is not known, but

the alignment process is not being intentionally delayed. They are proceeding legally until full alignment is achieved. For precise actions on risk level mitigation, you may request comments from the Ministry of Agriculture and the Ministry of Climate and Energy, as both are responsible for the transposition of RED III into Latvian legislation. Additionally, I can inform you that the Ministry of Agriculture has published Latvia's risk analysis (as required by RED III). Link here: [download](#). I would also recommend addressing this question to the aforementioned ministries. I cannot comment on the tools you have developed for risk mitigation within your company, as you are certified under SBP. I am not familiar with their standards. The Latvian Biomass Association is the national license holder for the SURE system.

Response to the stakeholder: Thank you for the information provided regarding the status of the transposition of the RED III Directive into Latvian legislation. We appreciate the clarification that RED III has not yet been fully implemented and is divided into several parts – with amendments to Cabinet Regulation No. 686, the Energy Law, and the Transport Energy Law, which is still under consideration in the Saeima at the third reading stage. It is useful to know that the transposition process is proceeding in its legal course and is not being deliberately delayed. Thank you also for the reference to the Latvian risk analysis published by the Ministry of Agriculture. We will certainly review this material and, if necessary, turn to the responsible authorities – the Ministry of Agriculture and the Ministry of Climate and Energy – to obtain more detailed clarifications regarding risk mitigation measures. We also appreciate your clarification on certification systems and the role of the Latvian Biomass Association as the national license holder of the SURE system.

Stakeholder description: Diāna Rupeika Ministry of Agriculture Forest Department Senior Expert of the Forest Resources and Hunting Division

Stakeholder comment: Thank you for your question. The Ministry of Agriculture has prepared an indicative assessment to provide clarity for businesses and the public on whether Latvian legislation and monitoring and enforcement systems are capable of ensuring that forest biomass complies with the revised sustainability criteria of Directive (EU) 2018/2001 (RED III), considering that work is still ongoing on amendments to Cabinet Regulation No. 686 of 2 November 2022, "Regulations on Sustainability and Greenhouse Gas Emission Savings Criteria, Criteria for Electricity Produced from Biomass Fuels, and the Procedure for Justifying, Certifying, and Monitoring Compliance with These Criteria," which transpose the RED III sustainability requirements, and that the national regulations have not yet entered into force by the RED III deadline of 21 May 2025. According to the current assessment by the Ministry of Agriculture, existing Latvian legislation and monitoring and enforcement systems already ensure compliance with the essential RED III sustainability criteria and correspond to a low-risk level. The assessment can be accessed on the Ministry's website in the "Forestry Sector" section: <https://www.zm.gov.lv/lv/izvertejums-par-meza-biomasas-atbilstibu-ilgtspejas-kriterijiem>.

Response to the stakeholder: Thank you for your information and indicative assessment regarding the transposition of the RED III Directive into Latvian legislation. We appreciate your clarification that the current Latvian legislation and supervisory systems already ensure compliance with the key RED III sustainability criteria and correspond to a low-risk level, as well as the information that the national regulations have not yet entered into force by the RED III deadline of 21 May 2025. This information will help our organization to further refine our risk mitigation measures and ensure that our suppliers and biomass comply with the relevant sustainability standards. We will also review the published Latvian risk assessment and, if necessary, contact the responsible ministries to obtain additional clarifications regarding risk reduction measures.

Stakeholder description: Kristaps Klauss Vice President at Latvian Forest Industry Federation Latvia

Stakeholder comment: After the distribution of stakeholder letters, a phone call was conducted. On the same day, a discussion took place regarding current issues and risk mitigation opportunities in the context of RED III. Information received: Amendments to Cabinet Regulation No. 686 of 2 November 2022 "Regulations on Sustainability and Greenhouse Gas Emission Savings Criteria, Criteria for Electricity Produced from Biomass, and the Procedure for Demonstrating, Certifying, and Monitoring Compliance with These Criteria," including: Point 9.2 – Forests with high biodiversity and other tree-covered areas that are species-rich, not degraded, or recognized as lands of high biodiversity are considered sustainable, provided there is no evidence that the production of raw materials contradicts the nature protection objectives and land use rules established for these areas. Point 15.4.4 – Forestry operations must follow practices that minimize permanent adverse impacts on soil quality, soil compaction, and ensure that there is no significant adverse effect on biodiversity elements and habitats. It was noted that possible changes to the definition of old-growth forests are being considered. The provisional date for the amendments to enter into force could be 19 September 2025. Discussions will continue regarding recommendations in the context of the EUDR (EU Deforestation Regulation).

Response to the stakeholder: Conclusion: Following this discussion, the information and recommendations received were taken into account, internal procedures at LSEZ SIA LASKANA were updated, and recommendations for risk mitigation measures in the SBP EU RED context were considered. This ensures that the company's forest biomass sourcing and utilization processes comply with RED III sustainability requirements and are integrated into transparent and effective control mechanisms.

Stakeholder description: Imants Kukuļs, Dr. geogr. Leading Researcher, Faculty of Exact Sciences and Technology, Department of Environmental Science Associate Professor, Faculty of Exact Sciences and Technology, Department of Environmental Science Leading Researcher, Faculty of Exact Sciences and Technology, Department of Geography

Stakeholder comment: This comment applies to TOF and forest lands. - The document refers to soils according to the international FAO classification, and it cannot be directly transferred or compared with the soil classification historically used in Latvia. For example, part of the gley soils in the Latvian classification correspond to the definition of Gleysols, but this applies only to soils where a distinct horizon is present (not just mottling), and it must be relatively close to the soil surface. All peat soils in Latvia with a thickness of 50 cm correspond to Histosols, while gley peat soils would more likely correspond to Gleysols. Fluvisols require very specific conditions, namely regular deposition of alluvial material. These soils are associated with river floodplains; however, in Latvia, rivers are generally small, and even in floodplains it is often not possible to identify this feature (layering). Therefore, not all floodplain soils can be classified as Fluvisols. Other soil types, except for Rendzina, are not found in Latvia. Rendzina is a very locally occurring soil type. The second aspect relates to cartographic material and its accuracy. In the submitted document, Table 6 on page 62 includes references to maps. At this scale (the FAO European map), sensitive soils in Latvia are identified only around Teiči Bog and Lake Lubāns (Histosols), while in Zemgale there are Gleysols. In the rest of Latvia, no sensitive soils are identified (based on this map). At the national level, we have historical soil maps, but these cover only agricultural land. There is no information available on forest soils. You are probably right that the only option is to use forest site types. Due to gleying intensity and peat presence, these would most likely include all wet forest types and peatland forests. In my opinion, "Grīnis" would not fall under this category, as the required gleying criteria may not be met there — specifically, they must occur at a depth of less than 40 cm.

Response to the stakeholder: LSEZ SIA LASKANA will take your comments into account when preparing the document "SBP Supply Base Risk Assessment for wood from non-forest land in Latvia."

5 Report updates and approval

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

Summary of changes: N/A

Name	Krišjānis Vēsmiņš
Title	Management representative
Date of report approval	27 Jan 2026

Name	Ojārs Zeme
Title	Report author
Date of report approval	27 Jan 2026

Annex 1: Detailed findings for Supply Base Evaluation indicators

Latvia Latvia	Indicator
1.1.1	Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.
Supply Base Verifiers	Applicable Legislation: • Cabinet Regulation No. 309 “Regulations Regarding Tree Felling Outside Forests” – regulates tree felling in TOF, overgrown areas, and urban environments. • Cabinet Regulation No. 935 “Regulations on Tree Felling in Forests” – technical requirements for stem wood and residues. • Forest Law – framework for final and tending felling in forests. • Law on Protective Zones – biomass management along roads, utility corridors, and buffer zones. • Law on Specially Protected Nature Territories – requirements for felling in protected areas. • Species and Habitat Protection Law – restrictions on protected species. • Cabinet Regulation No. 686 “Sustainability Criteria for Biomass” – emission savings and monitoring. • Guidelines of the Nature Conservation Authority – SPNT conditions and nature protection practices. Verification Procedures (Supply Base Verification): Legal compliance: All biomass harvesting is carried out in strict compliance with Latvian legislation. Compliance is monitored through permits, regulations, and safety standards. Feedstock registration and classification: The company keeps detailed records of feedstock obtained from: Overgrown agricultural lands, Other land categories (shrubs, tree/shrub cover), Infrastructure and urban areas. Documentation control: Suppliers must provide permits for tree felling outside forests Proof of origin: Each load is accompanied by certificates or permits confirming origin. Supply chain monitoring: Periodic random audits are conducted on full supply chain documentation, including contracts between landowners and harvesting operators.
Risk Rating justification	The risk assessment covers feedstock from the following sources: • Urban and landscape feedstock: small wooded areas, urban greenery, trees along water bodies. • Infrastructure feedstock: clearing vegetation along roads, railways, and power line corridors. • Agricultural land feedstock: overgrown arable land, meadows,

	pastures, and plantations not classified as fast-growing energy crops. Wood harvesting in non-forest areas is regulated by the framework. According to public reports, illegal harvesting in forests is minimal, and no reports of illegal harvesting from non-forest areas have been received for the company's operations. Based on verification measures, monitoring of origin volumes, and periodic audits, the risk of sourcing illegal biomass is assessed as low. A detailed risk assessment is available upon request.
Risk Rating	Low Risk

Latvia Latvia	Indicator
1.1.2	Legal ownership of land and resource use rights shall be respected.
Supply Base Verifiers	Ownership verification: Before any contract or harvesting activity, the company verifies ownership data in state registers (Land Register, State Land Service) to ensure the seller has legal rights to the biomass. Authorization and contract control: If an intermediary or manager is involved, a written authorization or contract from the landowner is required and verified. Felling documentation: For non-forest lands, municipal permits for tree felling are collected in accordance with Cabinet Regulation No. 309. Feedstock traceability: All biomass is accompanied by documentation confirming the origin and the legal right of the supplier to harvest it. Monitoring and audits: The company performs periodic random checks of supply chain documentation, including contracts and permits, to ensure compliance with legal requirements and ownership rights.
Risk Rating justification	The risk of violating land ownership or resource use rights within Latvia's biomass supply chain is assessed as low. This is supported by a robust legal framework, including the Civil Law (property rights), Land Register Law, Forest Law, Land Management Law, and the Real Estate Cadastre Law. Additionally, criminal and administrative legislation addresses illegal use of land and forest resources. Companies implement checks to verify ownership and usage rights before any harvesting or biomass acquisition, ensuring compliance with legal requirements and reducing the likelihood of disputes or unauthorized use. A detailed risk assessment is available upon request.
Risk Rating	Low Risk

Latvia Latvia	Indicator
1.1.3	Feedstock shall be legally harvested, supplied and produced, including in compliance with CITES, EUTR and other applicable legal trade requirements.
Supply Base Verifiers	Verification Mechanisms:

	• Compliance with the requirements of the European Union Timber Regulation (EUTR) is strictly maintained. • The company does not procure any timber species listed in the CITES (Convention on International Trade in Endangered Species of Wild Fauna and Flora) appendices. Risk Assessment: Based on the evaluation of compliance with the standard using the aforementioned verification means, the risk of illegally harvested wood entering the supply chain in Latvia is rated as low.
Risk Rating justification	The risk of illegally harvested biomass entering the supply chain from non-forest lands (urban, infrastructure, and agricultural areas) in Latvia is rated as low. This conclusion is based on a comprehensive legal framework that regulates tree felling outside the forest, integrated with strict land-use monitoring. Although these sources fall outside the primary "Forest Law," they are governed by Cabinet Regulation No. 309, which requires municipal permits for felling in urban and landscape areas, and Cabinet Regulation No. 1009, which ensures the traceability of all timber products regardless of their origin. For infrastructure maintenance (roads, railways, power lines), felling is strictly controlled through protection zone laws and formal agreements with state-owned utility managers. Latvia's transition from EUTR to EUDR (Regulation 2023/1115) further strengthens traceability, as the State Forest Service (VMD) maintains oversight of timber circulation. The use of the "Ozols" and "VMD" data systems, combined with the fact that CITES-listed species are not present in Latvian commercial biomass streams, ensures that the feedstock is legally sourced, supplied, and produced. A detailed risk assessment is available upon request.
Risk Rating	Low Risk

Latvia Latvia	Indicator
1.1.4	Payments for harvest rights and feedstock, including duties, relevant royalties and taxes related to timber harvesting shall be complete and up-to-date.
Supply Base Verifiers	Tax and fee payment records: Company maintains verifiable proof of payment for all applicable taxes, fees, and royalties, including receipts, payment orders, and approval acts. Official rating check: The company's taxpayer status in the VID database is "A," indicating good compliance with obligations. Accounting system controls: Financial systems are organized to ensure traceability and documentation of all payments to the state and partners. Regulatory oversight: Regular inspections and cooperation with VID and VMD allow monitoring of timber flows and associated tax obligations. Certification compliance: FSC and PEFC audits require evidence of tax and fee compliance.

	Publicly available verification: Company uses publicly accessible lists of tax debtors to profile suppliers and ensure risk mitigation.
Risk Rating justification	The risk that the company fails to pay taxes, royalties, or fees related to wood harvesting rights is assessed as low. This conclusion is supported by the comprehensive legal framework in Latvia, including the Law on Taxes and Fees, VAT Law (reverse VAT for timber), Personal Income Tax Law, Corporate Income Tax Law, Real Estate Tax Law, Natural Resources Tax Law, Forest Law (fees for cutting permits), MK Nr. 550 (VMD service fees), the Administrative Violations Code, and the Criminal Law (tax evasion). The company demonstrates consistent compliance with these regulations, maintains accurate accounting records, and regularly performs payments, ensuring obligations are fully met. Additionally, strong state oversight from VID and VMD, the application of reverse VAT in the timber sector, and requirements under FSC/PEFC certification standards significantly reduce the risk of non-compliance. A detailed risk assessment is available upon request.
Risk Rating	Low Risk

Latvia Latvia	Indicator
1.1.5	There shall be adequate protection of the Supply Base from unauthorised and illegal activities, such as illegal logging, mining, and encroachment.
Supply Base Verifiers	Not applicable to 'Landscape' and 'Urban, domestic and infrastructure' feedstock categories according to the SBP Instruction Document 1A.
Risk Rating justification	Not applicable to 'Landscape' and 'Urban, domestic and infrastructure' feedstock categories according to the SBP Instruction Document 1A.
Risk Rating	Low Risk

Latvia Latvia	Indicator
2.1.1	Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.
Supply Base Verifiers	To mitigate the identified risks and ensure the preservation of biological diversity, the company employs the following verification measures: Data System Checks: • Prior to any procurement or commencement of extraction, every site undergoes a mandatory check in the Nature Conservation Agency's (DAP) management system "Ozols". • This process identifies specially protected species, their habitats, EU and national significance habitats, and sensitive ecosystem elements (HCV zones). • For forest lands, the State Forest Register is additionally used to

	verify the presence of micro-reserves and protection zones. Documentary Verification and Evidence Storage: • A dedicated research file is prepared for each individual procurement case, serving as audit evidence (database screenshots, official certificates). • The company operates strictly according to its internal procedure: <i>"Approval, Verification, and Risk Mitigation Process for SBP-Compliant Material."</i> Procedures for Habitats in Non-Forest Lands: • If the "Ozols" system indicates a grassland or pasture habitat on non-forest land, the landowner is required to provide a "Habitat Management Plan." This plan must clearly state that the removal of woody biomass (bushes/trees) is necessary for the preservation or restoration of the specific habitat. • In the absence of such a plan, the company coordinates with the owner and the Nature Conservation Agency (DAP) to obtain the necessary approvals. • Biomass is only included in the SBP-controlled wood stream if there is written confirmation that the extraction does not harm the habitat. Regulatory Compliance: • Verification is grounded in Latvian legislation, including the <i>Law on the Conservation of Species and Habitats</i>, Cabinet Regulation No. 425, No. 172, and No. 526 (regarding retention trees and deadwood), as well as the EU Habitats and Birds Directives. • The company monitors that suppliers adhere to nature protection requirements in forests, which are integrated through the Forest Law and FSC/PEFC certification standards.
Risk Rating justification	While biodiversity protection in Latvian forest lands is strictly regulated by national legislation, the company has identified potential risks regarding biomass extraction from non-forest lands (e.g., agricultural lands, overgrown areas). These areas may overlap with biologically valuable grasslands or EU-protected habitats. Although Latvia maintains a comprehensive nature data system, there is a possibility that management activities in non-forest lands bordering <i>Natura 2000</i> sites or containing naturally developed habitats could impact protected species and ecosystems. Therefore, to uphold the precautionary principle and ensure compliance with criteria 2.1.1, 2.1.2, and 2.1.3, this category is designated as "Specified Risk." This designation ensures that every supply site is individually verified to prevent the degradation of High Conservation Value (HCV) areas and to guarantee that biomass extraction supports habitat maintenance rather than destruction. A detailed risk assessment is available upon request.

Risk Rating	Specified Risk
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Latvia Latvia	Indicator
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.
Supply Base Verifiers	To mitigate the identified risks and ensure the preservation of biological diversity, the company employs the following verification measures: Data System Checks: • Prior to any procurement or commencement of extraction, every site undergoes a mandatory check in the Nature Conservation Agency's (DAP) management system "Ozols". • This process identifies specially protected species, their habitats, EU and national significance habitats, and sensitive ecosystem elements (HCV zones). • For forest lands, the State Forest Register is additionally used to verify the presence of micro-reserves and protection zones. Documentary Verification and Evidence Storage: • A dedicated research file is prepared for each individual procurement case, serving as audit evidence (database screenshots, official certificates). • The company operates strictly according to its internal procedure: <i>"Approval, Verification, and Risk Mitigation Process for SBP-Compliant Material."</i> Procedures for Habitats in Non-Forest Lands: • If the "Ozols" system indicates a grassland or pasture habitat on non-forest land, the landowner is required to provide a "Habitat Management Plan." This plan must clearly state that the removal of woody biomass (bushes/trees) is necessary for the preservation or restoration of the specific habitat. • In the absence of such a plan, the company coordinates with the owner and the Nature Conservation Agency (DAP) to obtain the necessary approvals. • Biomass is only included in the SBP-controlled wood stream if there is written confirmation that the extraction does not harm the habitat. Regulatory Compliance: • Verification is grounded in Latvian legislation, including the <i>Law on the Conservation of Species and Habitats</i>, Cabinet Regulation No. 425, No. 172, and No. 526 (regarding retention trees and deadwood), as well as the EU Habitats and Birds Directives.

	The company monitors that suppliers adhere to nature protection requirements in forests (e.g., retaining 5 ecological trees per hectare, preserving deadwood and biogroups), which are integrated through the Forest Law and FSC/PEFC certification standards.
Risk Rating justification	While biodiversity protection in Latvian forest lands is strictly regulated by national legislation, the company has identified potential risks regarding biomass extraction from non-forest lands (e.g., agricultural lands, overgrown areas). These areas may overlap with biologically valuable grasslands or EU-protected habitats. Although Latvia maintains a comprehensive nature data system, there is a possibility that management activities in non-forest lands bordering <i>Natura 2000</i> sites or containing naturally developed habitats could impact protected species and ecosystems. Therefore, to uphold the precautionary principle and ensure compliance with criteria 2.1.1, 2.1.2, and 2.1.3, this category is designated as "Specified Risk." This designation ensures that every supply site is individually verified to prevent the degradation of High Conservation Value (HCV) areas and to guarantee that biomass extraction supports habitat maintenance rather than destruction. A detailed risk assessment is available upon request.
Risk Rating	Specified Risk

Latvia Latvia	Indicator
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.
Supply Base Verifiers	To mitigate the identified risks and ensure the preservation of biological diversity, the company employs the following verification measures: Data System Checks: - Prior to any procurement or commencement of extraction, every site undergoes a mandatory check in the Nature Conservation Agency's (DAP) management system "Ozols". - This process identifies specially protected species, their habitats, EU and national significance habitats, and sensitive ecosystem elements (HCV zones). - For forest lands, the State Forest Register is additionally used to verify the presence of micro-reserves and protection zones. Documentary Verification and Evidence Storage: - A dedicated research file is prepared for each individual procurement case, serving as audit evidence (database screenshots, official certificates). - The company operates strictly according to its internal procedure: <i>"Approval, Verification, and Risk Mitigation Process for SBP-</i>

	<i>Compliant Material."</i> Procedures for Habitats in Non-Forest Lands: • If the "Ozols" system indicates a grassland or pasture habitat on non-forest land, the landowner is required to provide a "Habitat Management Plan." This plan must clearly state that the removal of woody biomass (bushes/trees) is necessary for the preservation or restoration of the specific habitat. • In the absence of such a plan, the company coordinates with the owner and the Nature Conservation Agency (DAP) to obtain the necessary approvals. • Biomass is only included in the SBP-controlled wood stream if there is written confirmation that the extraction does not harm the habitat. Regulatory Compliance: • Verification is grounded in Latvian legislation, including the <i>Law on the Conservation of Species and Habitats</i>, Cabinet Regulation No. 425, No. 172, and No. 526 (regarding retention trees and deadwood), as well as the EU Habitats and Birds Directives. • The company monitors that suppliers adhere to nature protection requirements in forests, which are integrated through the Forest Law and FSC/PEFC certification standards.
Risk Rating justification	While biodiversity protection in Latvian forest lands is strictly regulated by national legislation, the company has identified potential risks regarding biomass extraction from non-forest lands (e.g., agricultural lands, overgrown areas). These areas may overlap with biologically valuable grasslands or EU-protected habitats. Although Latvia maintains a comprehensive nature data system, there is a possibility that management activities in non-forest lands bordering <i>Natura 2000</i> sites or containing naturally developed habitats could impact protected species and ecosystems. Therefore, to uphold the precautionary principle and ensure compliance with criteria 2.1.1, 2.1.2, and 2.1.3, this category is designated as "Specified Risk." This designation ensures that every supply site is individually verified to prevent the degradation of High Conservation Value (HCV) areas and to guarantee that biomass extraction supports habitat maintenance rather than destruction. A detailed risk assessment is available upon request.
Risk Rating	Specified Risk

Latvia Latvia	Indicator
2.2.1	Feedstock shall not be sourced from land that had one of the following statuses in January 2008 and no longer has that status due to land conversion: a. Forests b. Wetlands c. Peatlands d. Highly biodiverse grasslands.

Supply Base Verifiers	Historical data verification (VMD register): The company checks 2008 forest status in the official Forest State Register to identify areas classified as forests at that time. Geospatial verification: Geoportals.lv: Historical land use dynamics and restrictions. Karte.lad.gov.lv: Verification of high-biodiversity grasslands and agro-environmental support areas. Kadastrs.lv: Historical land category changes and official cadastral records. LĢIA orthoimagery analysis: Comparison of ortho-photos from 2007 and later years (2011, 2016, 2019, 2022) to visually confirm no land transformation occurred. Compliance with national procedures: The company follows MK Nr. 527 and other regulations governing forest-to-other land conversion, ensuring all sourcing meets legal and sustainability requirements. Company internal control: Systematic pre-sourcing checks and documented verification steps for every purchased plot minimize the risk of acquiring wood from non-compliant lands.
Risk Rating justification	The risk that wood in the company's supply base originates from lands that lost forest, wetland, or high-biodiversity grassland status after January 2008 is assessed as low. This conclusion is based on strict national and EU legal frameworks, including RED II (Directive 2018/2001), LULUCF Regulation (ES 2018/841), national biomass sustainability criteria (MK Nr. 686), Forest Law, Land Management Law, Species and Habitat Protection Law, Melioration Law, and historical forest inventory regulations (MK Nr. 384). The company performs thorough historical verification using official registers and geospatial data, ensuring that all sourced areas were legally permissible in 2008 and have maintained their status. Latvia's stringent legal controls over deforestation and land conversion, along with the company's systematic verification procedures, strongly mitigate the risk of sourcing non-compliant wood. A detailed risk assessment is available upon request.
Risk Rating	Low Risk

Latvia Latvia	Indicator
2.2.2	Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.
Supply Base Verifiers	Systematic pre-harvest assessment: Each sourcing site is evaluated using the "Ozols" environmental data management system to identify high conservation value areas, protected biotopes, and sensitive ecosystems. Compliance with regulations: Harvesting activities follow all relevant Latvian regulations (MK Nr. 936, MK Nr. 935), ensuring preservation of key ecological elements such as habitat trees, deadwood, and micro-reserves. Long-term competence and stability: The company has extensive industry experience, continuous FSC/PEFC/SBP certification, and is regularly audited by independent third parties.

	Consistent risk mitigation: Specific measures targeting ecosystem protection are applied across all operations. Historical audits and company experience demonstrate that the implemented controls effectively prevent negative impacts on ecosystem health, vitality, and functions.
Risk Rating justification	The risk of negative impacts on ecosystem health, vitality, functions, or services in the company's supply base is assessed as low. This conclusion is based on comprehensive national legislation (Forest Law, Environmental Protection Law, Dabas aizsardzības noteikumi mežā, Meža atjaunošanas noteikumi, Meža ilgtspējīgas apsaimniekošanas novērtēšanas kārtība, Biomasas ilgtspējas kritēriji, Meliorācijas Law, and Aizsargjoslu Law) and strict adherence to FSC/PEFC/SBP certification standards. Operations are systematically planned to preserve high conservation value areas, protect ecologically important trees and deadwood, maintain micro-reserves, and safeguard water-related ecosystems. Long-term operational experience and independent audits confirm the effectiveness of these measures in preventing harm to ecosystem functions and services. A detailed risk assessment is available upon request.
Risk Rating	Low Risk

Latvia Latvia	Indicator
2.2.3	Soil quality in the Supply Base shall be maintained or enhanced
Supply Base Verifiers	Careful harvesting planning: Timber harvesting uses low-impact techniques (e.g., during frozen conditions or on dry soils). Where necessary, manual harvesting with hand chainsaws replaces heavy machinery to reduce soil pressure. Hydrological protection: Strict adherence to buffer zones around water bodies; machinery movement is limited to predefined routes, with branch mats or similar measures applied to prevent rutting and erosion. Pollution prevention: Machinery is maintained in optimal condition; fuel and lubricants are handled with containment measures to avoid spills or leaks into soil and water. Company experience: Long-standing operations with continuous FSC/PEFC/SBP certification demonstrate low risk. Audits and internal inspections confirm consistent compliance. Monitoring and verification: Regular supplier audits and post-harvest site inspections ensure preventive planning and operational oversight effectively prevent any negative impact on soil or water resources.
Risk Rating justification	The risk of negative impacts on soil quality or water resources within the company's supply chains is assessed as low. This assessment is supported by comprehensive national legislation (Water Management Law, Forest Law, Soil Protection and Drainage Laws, Aizsargjoslu Law, Dabas aizsardzības noteikumi mežā, and Biomass Sustainability Criteria) and industry best practices. Operations are carefully planned to minimize soil compaction and erosion, protect hydrological regimes, and prevent contamination from fuels

	or lubricants. Historical audits, internal inspections, and long-term certification records (FSC/PEFC/SBP) show no incidents of degradation, confirming the effectiveness of risk mitigation measures at all harvesting sites. A detailed risk assessment is available upon request.
Risk Rating	Low Risk

Latvia Latvia	Indicator
2.2.4	Where the removal of harvest forest residues and/or stumps occurs, this shall not lead to irreversible negative impacts to the ecosystem.
Supply Base Verifiers	Chemical use restriction: No pesticides or other hazardous chemicals are applied during timber harvesting. Technical fluid control: Fuel and lubricants are stored and handled with strict protocols to prevent soil contamination or atmospheric emissions. Machinery maintenance is performed consistently to minimize exhaust emissions. Emission mitigation: Work planning is optimized, including transport routing and machine downtime management, to reduce direct greenhouse gas emissions. Company experience: The company has long-standing operations, continuous FSC/PEFC certification, and a record of regular audits confirming effective implementation of air and chemical control measures. Monitoring and verification: Internal audits and inspections verify that established mechanisms function reliably and comply fully with environmental standards.
Risk Rating justification	The risk of negative impacts on air quality or uncontrolled chemical use in the company's supply chains is assessed as low. This conclusion is based on Latvia's comprehensive legislation regulating air emissions (Pollution Law, Air Quality Regulations, and biomass activity permits) and chemical management (Chemical Substances Law, REACH, Plant Protection Law). Company operations follow these statutory requirements and industry best practices, including restricted chemical use, proper storage and handling of fuels and lubricants, and optimized operational planning to reduce greenhouse gas emissions. Historical audits and certification evidence show no violations or incidents of air pollution or chemical misuse within the company's supply chain. A detailed risk assessment is available upon request.
Risk Rating	Low Risk

Latvia Latvia	Indicator
2.2.5	Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.
Supply Base Verifiers	Water protection measures: Timber harvesting is planned to maintain natural water flow and prevent downstream disturbances. All legally defined buffer

	zones along water bodies and wetlands are strictly observed. Erosion and sediment control: Low-impact harvesting and extraction methods (e.g., branch cover on extraction tracks) are applied to minimize soil erosion and prevent sediment or sludge from entering water bodies. Pollution prevention: Machinery maintenance is strictly enforced to avoid fuel or lubricant leaks, and no chemicals that could contaminate groundwater are used. Site-specific adaptation: Work methods are adapted per site; in sensitive water ecosystems, mechanized extraction may be replaced with manual techniques to minimize environmental impact. Monitoring and verification: Compliance is verified through regular internal audits, ensuring adherence to national legislation and sustainable forestry practices.
Risk Rating justification	The risk of negative impacts on water resources in the company's supply chains is assessed as low. This conclusion is based on Latvia's comprehensive legal framework regulating water protection (including the Water Management Law, Protected Areas Law, and surface/groundwater quality regulations), which defines mandatory buffer zones, watercourse protection, and sedimentation prevention measures. Company operations follow these statutory requirements and incorporate industry best practices, such as using low-impact harvesting methods and machinery maintenance to prevent pollution. Regular internal audits and historical evidence show no recorded cases of deterioration in water quality or quantity within the company's supply chain, confirming the effectiveness of mitigation measures. A detailed risk assessment is available upon request.
Risk Rating	Low Risk

Latvia Latvia	Indicator
2.2.6	Air emissions shall comply with national legislation or in the absence of national legislation with industry best practice.
Supply Base Verifiers	Regulatory compliance: The company fully complies with permits for polluting activities, including stationary and mobile sources in biomass production and transport. Emission monitoring: Air emissions are regularly measured and recorded according to national requirements (PM10, PM2.5, NO2, CO2, etc.). GHG accounting: The company calculates greenhouse gas (GHG) emissions across the entire supply chain, ensuring transparency and alignment with sustainability goals (RED III). Use of BAT: Processes follow the Best Available Techniques (BAT) principle, as defined in the Environmental Protection Law, including the use of low-sulfur fuels, modern combustion technologies, and emission controls. Industry alignment: All operations comply with national legislation and industry best practice, including European emission standards for transport vehicles (EURO standards) and technical requirements for biomass burning and processing.

Risk Rating justification	The risk in the company's supply chains is assessed as low. This assessment is supported by Latvia's comprehensive legal framework regulating air emissions from biomass extraction, transport, and production. The company ensures full compliance with permits, emission limits, and the application of Best Available Techniques (BAT). Regular monitoring and greenhouse gas accounting throughout the supply chain demonstrate adherence to both legal requirements and industry best practice, ensuring a low-risk designation. A detailed risk assessment is available upon request.
Risk Rating	Low Risk

Latvia Latvia	Indicator
2.2.7	Pesticides shall only be used as part of an Integrated Pest Management (IPM) plan in compliance with national legislation, chemical safety data sheets and industry best practice. Banned pesticides shall not be used.
Supply Base Verifiers	Not applicable to 'Landscape' and 'Urban, domestic and infrastructure' feedstock categories according to the SBP Instruction Document 1A.
Risk Rating justification	Not applicable to 'Landscape' and 'Urban, domestic and infrastructure' feedstock categories according to the SBP Instruction Document 1A.
Risk Rating	Low Risk

Latvia Latvia	Indicator
2.2.8	Waste shall be disposed of in an environmentally appropriate manner.
Supply Base Verifiers	Internal waste management: The company has established clear procedures for waste sorting and tracking. Production by-products are utilized for energy generation or further processing, in line with the "Zero Waste" principle. Hazardous waste control: Hazardous waste from forestry and transport equipment maintenance (e.g., oils, filters) is collected and handed over exclusively to licensed waste operators, with documented transfer receipts maintained. Site-level checks: Before completing work at each site, inspections ensure no household or technical waste remains in the forest environment. Long-term experience: The company has long-standing operations in the sector and FSC FM certification. Historical audits confirm that waste management practices are stable, transparent, and follow industry best practices. External cooperation: The company works only with registered waste operators, ensuring that waste is disposed of in an environmentally sound manner even after leaving company premises.
Risk Rating justification	The risk in the company's supply chains is assessed as low. This assessment is based on the comprehensive legal framework in Latvia regulating waste management in biomass production and forestry, including

	hazardous waste. The company follows the “Zero Waste” principle by maximizing the use of by-products (e.g., bark, sawdust) for energy or other products. Regular audits, historical compliance, and strict adherence to national regulations demonstrate consistent environmentally appropriate waste disposal practices, supporting a low-risk designation. A detailed risk assessment is available upon request.
Risk Rating	Low Risk

Latvia Latvia	Indicator
2.2.9	Harvesting levels shall be justified as to how they can be sustained with reference to inventory and growth data for the Supply Base.
Supply Base Verifiers	Not applicable to ‘Landscape’ and ‘Urban, domestic and infrastructure’ feedstock categories according to the SBP Instruction Document 1A.
Risk Rating justification	Not applicable to ‘Landscape’ and ‘Urban, domestic and infrastructure’ feedstock categories according to the SBP Instruction Document 1A.
Risk Rating	Low Risk

Latvia Latvia	Indicator
2.2.10	Harvested areas shall be regenerated
Supply Base Verifiers	State control mechanisms: The Latvian State Forest Service (VMD) monitors forest regeneration. Field inspections are conducted 3–5 years after regeneration reports are submitted, with administrative sanctions for non-compliance clearly defined. Industry best practice: The company follows recommendations from the Latvian State Forest Research Institute “Silava” regarding soil preparation (e.g., mounding) and the selection of suitable tree species according to site conditions. Exceptions: Wood sourced from non-forest land is exempt from legal regeneration obligations. In such areas, tree removal occurs for safety or land-use purposes, and any planting is governed by municipal regulations.
Risk Rating justification	The risk in the company’s supply chains is assessed as low . This assessment is based on Latvia’s clear legal framework and strong enforcement mechanisms for forest regeneration. Harvested areas in production forests are subject to mandatory regeneration requirements, including species selection, planting density, and quality standards, with oversight by the State Forest Service (VMD). Exceptions for urban, residential, or infrastructure areas are legally defined, where regeneration obligations fall under municipal regulations or construction project requirements. Historical compliance data and field inspections demonstrate consistent adherence to regeneration obligations, supporting a low-risk designation for the supply chain.

	A detailed risk assessment is available upon request.
Risk Rating	Low Risk

Latvia Latvia	Indicator
2.2.11	The impacts of natural processes such as fires, pests and diseases shall be managed.
Supply Base Verifiers	Not applicable to 'Landscape' and 'Urban, domestic and infrastructure' feedstock categories according to the SBP Instruction Document 1A.
Risk Rating justification	Not applicable to 'Landscape' and 'Urban, domestic and infrastructure' feedstock categories according to the SBP Instruction Document 1A.
Risk Rating	Low Risk

Latvia Latvia	Indicator
2.2.12	Genetically modified trees shall not be used.
Supply Base Verifiers	Not applicable to 'Landscape' and 'Urban, domestic and infrastructure' feedstock categories according to the SBP Instruction Document 1A.
Risk Rating justification	Not applicable to 'Landscape' and 'Urban, domestic and infrastructure' feedstock categories according to the SBP Instruction Document 1A.
Risk Rating	Low Risk

Latvia Latvia	Indicator
3.1.1	LULUCF emissions shall be accounted for through one of the following routes: Route A Feedstock may be sourced from a country of origin which is party to the Paris Agreement, and which has submitted a Nationally Determined Contribution to the United Nations Framework Convention on Climate Change (UNFCCC) covering carbon emissions and removals from agriculture, forestry and land use which ensure the changes in carbon stock associated with biomass harvest are counted towards the country's commitment to reduce or limit greenhouse gas emissions, or Route B Feedstock may be sourced from a country of origin which is party to the Paris Agreement and has national or sub-national laws in place (developed in accordance with Article 5 of the Paris Agreement and applicable in the area of harvest), to conserve and enhance carbon stocks and sinks, and provided there is evidence that reported LULUCF-sector emissions do not exceed removals, or Route C Feedstock may be sourced from a Supply Base where an assessment demonstrates that both the carbon stock is stable, and the forests' capacity to act as a carbon sink is stable or increasing over the long term.
Supply Base Verifiers	Latvia, as a Paris Agreement signatory, maintains centralized and accurate GHG emission accounting for the LULUCF sector. The Latvian State Forest Research Institute "Silava" collects and calculates carbon sequestration data using IPCC (Intergovernmental Panel on Climate Change) guidelines and sector-specific coefficients. Compliance with the "No-debit rule" is monitored at the national level to

	ensure that forestry operations do not generate net emission increases. Company role: When sourcing wood in accordance with national legislation, no additional obligations are imposed on individual companies for LULUCF accounting. National reporting: Annual LULUCF reports are submitted to the UNFCCC and integrated into the National Energy and Climate Plan (NEKP 2021–2030), ensuring transparency and alignment with SBP requirements.
Risk Rating justification	The risk in the company's supply chains is assessed as low. This assessment is based on Latvia's comprehensive legal and institutional framework for greenhouse gas (GHG) accounting in the LULUCF sector. National authorities collect, verify, and report emissions data in line with the Paris Agreement and the EU "No-debit rule" under Regulation (EU) 2018/841. The centralized monitoring and reporting system ensures that forestry activities do not result in net emission increases, providing confidence that wood sourcing practices comply with international climate commitments. As LULUCF accounting is a sovereign state function, individual companies are expected to comply with national legislation, and there is no evidence of systemic risk in this regard. A detailed risk assessment is available upon request.
Risk Rating	Low Risk

Latvia Latvia	Indicator
3.2.1	All feedstock sourcing shall be consistent with either of these two options: Option A. Feedstock may be sourced from Supply Bases where an assessment of the Supply Base shows that the forest carbon stocks are stable or increasing, or Option B. Feedstock may be sourced, if the assessment shows that the forest carbon stocks are declining in the Supply Base, provided that the decline is due to natural processes (fire, pests etc.), and sourcing of feedstock has the aim to recover feedstock that would otherwise be lost or to assist regeneration.
Supply Base Verifiers	Not applicable to 'Landscape' and 'Urban, domestic and infrastructure' feedstock categories according to the SBP Instruction Document 1A.
Risk Rating justification	Not applicable to 'Landscape' and 'Urban, domestic and infrastructure' feedstock categories according to the SBP Instruction Document 1A.
Risk Rating	Low Risk

Latvia Latvia	Indicator
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.
Supply Base Verifiers	Not applicable to 'Landscape' and 'Urban, domestic and infrastructure' feedstock categories according to the SBP Instruction Document 1A.

Risk Rating justification	Not applicable to 'Landscape' and 'Urban, domestic and infrastructure' feedstock categories according to the SBP Instruction Document 1A.
Risk Rating	Low Risk

Latvia Latvia	Indicator
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).
Supply Base Verifiers	Not applicable to 'Landscape' and 'Urban, domestic and infrastructure' feedstock categories according to the SBP Instruction Document 1A.
Risk Rating justification	Not applicable to 'Landscape' and 'Urban, domestic and infrastructure' feedstock categories according to the SBP Instruction Document 1A.
Risk Rating	Low Risk

Latvia Latvia	Indicator
3.3.1	Feedstock sourcing shall be in compliance with the principles of cascading use, high quality stem wood shall not be used as feedstock if it is in substantial demand for long-lived products in the Supply Base.
Supply Base Verifiers	Not applicable to 'Landscape' and 'Urban, domestic and infrastructure' feedstock categories according to the SBP Instruction Document 1A.
Risk Rating justification	Not applicable to 'Landscape' and 'Urban, domestic and infrastructure' feedstock categories according to the SBP Instruction Document 1A.
Risk Rating	Low Risk

Latvia Latvia	Indicator
4.1.1	Freedom of association and the right to collective bargaining shall be respected in the workplace.
Supply Base Verifiers	The company provides an environment where employees are free to join trade unions and initiate collective bargaining. Social dialogue is encouraged as a tool to improve working conditions. Supply chain oversight: Employment and subcontractor agreements include explicit clauses requiring compliance with Latvian labor law, including freedom of association and collective bargaining rights. Internal policy: The company's publicly available "Corporate Social Responsibility Policy" clearly defines its commitment to uphold health, safety, and social principles. Regular self-assessment: Annual internal audits evaluate compliance with

	labor rights and working conditions to identify and mitigate potential risks. Long-term experience: The company has operated in the sector for many years, and regular third-party audits (FSC/PEFC/SBP) have never reported restrictions on workers' rights to organize.
Risk Rating justification	The risk in the company's supply chains is assessed as low . This conclusion is based on a strong legal framework in Latvia and international standards protecting the rights of workers to freely join trade unions and engage in collective bargaining. The company actively ensures that employees can exercise these rights without restriction, and historical audits and inspections have not identified any violations. Policies and procedures support social dialogue and transparency, fostering a safe environment for labor representation and negotiation. A detailed risk assessment is available upon request.
Risk Rating	Low Risk

Latvia Latvia	Indicator
4.1.2	Forced or compulsory labour shall not be used.
Supply Base Verifiers	All employment relationships are based on voluntary, written contracts fully compliant with the Labor Law. Employees have the right to terminate employment according to legal procedures at any time. Subcontractor agreements explicitly require compliance with Latvian labor laws, prohibiting any form of forced labor. Internal Corporate Social Responsibility policy publicly available, clearly stating zero tolerance for labor exploitation and setting high ethical standards. Annual internal audits ensure working conditions comply with legal requirements and that forced labor risks are eliminated, especially for subcontracted work. Long-standing experience and certifications (FSC/PEFC/SBP) demonstrate continuous compliance; independent audits over the years have never revealed violations or suspicions of forced labor in the company or its supply chains.
Risk Rating justification	The risk in the company's supply chains is assessed as low . This conclusion is based on a strong national and international legal framework that strictly prohibits forced or compulsory labor, including in forestry and biomass production. All employment relationships are voluntary and based on written contracts in compliance with Latvian labor law. Historical audits, inspections, and long-term operational experience have not identified any instances of forced labor. The company has clear internal policies and controls to prevent exploitation, including measures for monitoring subcontractors and foreign workers. A detailed risk assessment is available upon request.
Risk Rating	Low Risk

Latvia Latvia	Indicator
4.1.3	Child labour shall not be used.
Supply Base Verifiers	Employment contracts are only concluded with individuals who have reached the legal working age (at least 18 years in forestry and production processes). Mandatory verification of identity documents during hiring. Contracts with subcontractors include explicit clauses requiring compliance with labor laws, including the prohibition of child labor; non-compliance can lead to immediate termination of cooperation. Internal Corporate Social Responsibility policy publicly available, clearly stating the commitment to protect children's rights and prohibit child labor. Annual internal audits verify that no minors are employed in any operational units or sites. Historical audit reports and inspections by the State Labour Inspectorate (VDI) confirm the effectiveness of the company's control systems in preventing child labor.
Risk Rating justification	The risk in the company's supply chains is assessed as low. This assessment is based on a robust legal framework in Latvia and international standards prohibiting child labor, particularly in high-risk sectors such as forestry and biomass production. All employees are verified to meet the minimum legal age requirements, and historical audits and inspections have not identified any cases of child labor. The company has established strict internal policies and controls to prevent child labor, ensuring that only adults participate in forestry and production operations. A detailed risk assessment is available upon request.
Risk Rating	Low Risk

Latvia Latvia	Indicator
4.1.4	Workers shall not be discriminated in hiring, remuneration, access to training, promotion, termination or retirement.
Supply Base Verifiers	HR procedures and recruitment documentation showing decisions based on qualifications and competencies. Transparent wage and promotion systems documented in internal policies. Contracts with subcontractors include mandatory compliance with the Labour Law, specifically the prohibition of discrimination. Internal Corporate Social Responsibility policy publicly available, clearly stating commitment to a safe and discrimination-free workplace. Annual internal audits reviewing workforce diversity, training accessibility, and compensation equity. Mechanisms for reporting potential violations, including open-door policies and anonymous reporting channels, ensuring protection against retaliation.
Risk Rating justification	The risk in the company's supply chains is assessed as low . This

	assessment is based on Latvia's comprehensive national legal framework prohibiting discrimination at all stages of employment, as well as the company's policies and practices. Employment decisions, wage determination, access to training, and career progression are based solely on professional qualifications and competencies. Historical audits and inspections have not revealed any complaints or violations related to discrimination. The company maintains a zero-tolerance policy for discrimination, and internal audits annually review employee rotation, training access, and wage dynamics to ensure equitable treatment. A detailed risk assessment is available upon request.
Risk Rating	Low Risk

Latvia Latvia	Indicator
4.1.5	Wages paid to workers shall meet or exceed the legal minimum wage or where there is no statutory minimum wage industry norms shall be met or exceeded
Supply Base Verifiers	Company payroll records confirming compliance with the statutory minimum wage and industry standards. Contracts with subcontractors include mandatory clauses on compliance with the Labour Law, formal wage payment, and tax obligations. Internal policy (Corporate Social Responsibility policy) publicly declares commitment to fair wages and social benefits. Annual monitoring of wage rates, including adjustments for inflation and legal changes. Verification of historical compliance through VID and VDI audits, showing no past violations.
Risk Rating justification	The risk in the company's supply chains is assessed as low. This assessment is based on Latvia's clear legal framework for minimum wages, industry collective agreements, and robust monitoring mechanisms. All employees, including those in the lowest-paid positions, receive wages at or above the 2026 statutory minimum of €780 per month. Average wages in forestry and logistics positions within the company range between €1,200–1,500, significantly above the legal minimum. Historical inspections by the State Revenue Service (VID) and State Labour Inspectorate (VDI) have not identified violations regarding wage levels or payment regularity. The company also periodically reviews wages to ensure alignment with inflation and updated legislation. A detailed risk assessment is available upon request.
Risk Rating	Low Risk

Latvia Latvia	Indicator
4.1.6	Working hours shall comply with legal requirements.
Supply Base Verifiers	The company maintains precise working hours records, including digital

	systems in forestry machinery (harvesters, forwarders). Internal policies clearly define occupational safety and appropriate work schedule management for high-risk tasks. Supply chain partner agreements include mandatory compliance with Labour Law provisions regarding working and rest hours. Regular internal audits and State Labour Inspectorate inspections confirm compliance. Documentation maintained: working hours logs and digital records, audit protocols, and supply chain partner compliance documents.
Risk Rating justification	The risk in the company's supply chains is assessed as low. This assessment is based on the Latvian legal framework, which protects employees' working and rest hours, regular inspections by the State Labour Inspectorate (VDI), and the company's internal procedures. The company systematically plans work in high-risk sectors, maintains accurate working hours records, and conducts internal audits to ensure employees receive adequate rest and that legally established working time limits are not exceeded. This approach minimizes risks associated with excessive workload and occupational safety. A detailed risk assessment is available upon request.
Risk Rating	Low Risk

Latvia Latvia	Indicator
4.1.7	Workers shall have access to health care provisions, sickness benefits, retirement benefits, invalidity benefits, death benefits, and workers' compensation
Supply Base Verifiers	The company ensures fully official payroll, eliminating risks associated with "envelope wages" and securing entitlement to all statutory benefits. Supply chain security: Collaboration agreements with contractors mandate compliance with social insurance contributions, verified periodically in VID databases. Internal policy: The company's "Corporate Social Responsibility Policy" publicly commits to providing all statutory benefits and protecting employee health and safety. Regular self-assessment: Annual internal audits verify timely occupational health checks and compliance with social benefit obligations according to 2026 contribution rates. Historical compliance: Reports from state supervisory authorities show no violations regarding social insurance payments or benefits provision.
Risk Rating justification	The risk of non-compliance regarding employee social and insurance benefits is assessed as low. This assessment is supported by: Latvia's comprehensive mandatory social insurance system, which ensures statutory benefits for all officially employed workers. Employer obligations under the State Social Insurance Law (01.01.1998), covering pensions, disability, sickness, maternity, and work accident

	insurance. Contributions for 2026: 33.09% total, of which 23.59% is paid by the employer. Work-related injury compensation under the Mandatory Social Insurance against Accidents at Work and Occupational Diseases Law (01.01.1997), including treatment, rehabilitation, and loss compensation. Employer responsibilities under Labour Protection Law and sector-specific regulations (MK 310) ensuring occupational health checks, prevention of occupational diseases, and health protection in high-risk forestry jobs. Best practices include private health insurance for faster medical access, accident insurance for additional compensation, and insurance compliance for foreign workers (A1 principle). Compliance monitored by state authorities: VID – contribution reporting; VSAA – benefit allocation; VDI – workplace inspections; Work Accident Commissions – investigations. A detailed risk assessment is available upon request.
Risk Rating	Low Risk

Latvia Latvia	Indicator
4.1.8	Training shall be provided for all workers to allow them to implement the conditions set out in all elements of the SBP Standards relevant to their responsibilities.
Supply Base Verifiers	Structured training system: The company maintains a comprehensive training program covering SBP/FSC/PEFC requirements, occupational safety, and fire safety, managed by the Production Director in cooperation with a certified occupational safety specialist. Training records: Detailed registers document each employee's training date, topic, and knowledge assessment, including Safe work in forests and chipping areas (MK 310); Fire safety and emergency procedures (MK 238); SBP sustainability criteria compliance in daily operations. Operator qualification: All harvester, forwarder, and truck drivers receive specialized training for fuel spill management and fire-fighting equipment usage. Regular self-assessment: Annual internal audits verify that all employees, including new hires, have received the complete training cycle before commencing work. Audited compliance: Past inspections and SBP certification audits confirm the training system is functional and compliant.
Risk Rating justification	The risk of inadequate employee training affecting SBP compliance is assessed as low. This assessment is justified by: A clear national legal framework regulating occupational safety and professional qualifications, including the Labour Protection Law, Labour Law, and related Cabinet of Ministers regulations (MK 310,

	MK 749, MK 148). • Mandatory training for all employees on workplace risks, safe methods, environmental protection, and SBP-specific requirements. • Sector-specific training for forestry operations, including safe tree felling, machinery use (harvesters, forwarders, chippers), and fire prevention. • Annual refresher training and induction for new employees ensure continuous compliance with standards. • Participation in FSC, PEFC, and SBP seminars organized by industry associations. • Historical audits by the State Labour Inspectorate (VDI), State Fire and Rescue Service (VUGD), and SBP certification bodies confirm the effectiveness of training programs. A detailed risk assessment is available upon request.
Risk Rating	Low Risk

Latvia Latvia	Indicator
4.1.9	Mechanisms shall be in place for resolving grievances and disputes in the workplace.
Supply Base Verifiers	Internal grievance mechanism: Employees can submit complaints physically, electronically, or via open-door communication with management or HR. Whistleblowing procedure: Company regulations define confidential reporting channels for violations, including SBP-related issues. Corporate policy: Ethical standards and grievance rights are clearly documented in the company's "Organizational Corporate Social Responsibility Policy." Supply chain oversight: Subcontractor agreements include mandatory compliance with labor law grievance mechanisms. Internal audits: Annual review of received complaints, their handling, and implementation of preventive measures to avoid recurrence.
Risk Rating justification	The risk of unresolved workplace grievances or disputes in the company's supply chains is assessed as low. This assessment is justified by: • Comprehensive national legislation providing multiple levels of grievance resolution, from internal company mechanisms to state oversight, including the Labour Dispute Law, Whistleblowing Law, Labour Inspection Act, and Trade Union Law. • Internal company regulations specifying formal procedures for complaints, including written submissions, anonymous reporting, and defined timelines for response (≤7 days for internal complaints, ≤3 months for SBP/PEFC grievances). • Established "open-door" policy allowing employees to approach management or HR directly. • Integration of grievance mechanisms into the corporate social responsibility policy, ensuring clarity on ethical standards and

	reporting rights. • Supply chain contracts require subcontractors to comply with labor laws, automatically including grievance and dispute procedures. • Annual internal audits to monitor complaint handling and implement preventive measures. • Historical compliance verified by state inspections, with no instances of ignored complaints or procedural breaches. A detailed risk assessment is available upon request.
Risk Rating	Low Risk

Latvia Latvia	Indicator
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.
Supply Base Verifiers	System implementation and documentation: The company maintains a comprehensive occupational health and safety management system with written instructions and procedures for all positions and operations (forestry, chipping, logistics). Risk assessment: Annual evaluations by certified occupational safety specialists identify hazards and prescribe mitigation measures. Personal Protective Equipment (PPE): Workers are provided with appropriate certified PPE compliant with applicable regulations (e.g., MK 310 for forestry). Communication and training: Employees receive regular safety briefings, and company policies are accessible to all staff and contractors. Health protection: Health insurance and additional preventive measures are in place to ensure rapid access to medical care. Supply chain oversight: Contracts with external service providers include mandatory compliance with occupational safety standards, with on-site inspections to verify PPE usage and safe distances during operations.
Risk Rating justification	The risk of inadequate worker health and safety measures in the company's biomass supply chains is assessed as low. This assessment is justified by: • Comprehensive national legislation covering all aspects of occupational safety, including the Labour Protection Law, Government Regulations on Occupational Safety Organization, Forestry Occupational Safety Requirements, and mandatory health checks. • Established company policies and procedures that address risk assessment, training, personal protective equipment (PPE), and operational controls. • Regular annual risk assessments conducted by certified safety specialists, with mitigation measures for hazards such as noise, vibration, falling objects, and machinery. • Mandatory provision of certified PPE to all workers at no cost,

	including helmets, protective boots, and other task-specific equipment. • Additional health protection measures, such as employee health insurance exceeding minimum legal requirements. • Regular internal audits and monitoring, with compliance verification for both in-house and contractor activities. A detailed risk assessment is available upon request.
Risk Rating	Low Risk

Latvia Latvia	Indicator
4.2.1	Negative social and community impacts shall be identified and avoided.
Supply Base Verifiers	Operational planning: Forest harvesting and transportation logistics are planned considering proximity to populated areas and the condition of infrastructure. All municipal traffic restrictions are observed. Stakeholder communication: The company maintains dialogue with local communities and municipalities. Harvesting is scheduled to minimize noise and dust impacts (e.g., work during daytime in populated areas). Preservation of cultural values: No work starts without approval from the State Forest Service (VMD), which ensures compliance with natural and cultural heritage protection requirements. Supply chain oversight: Contracts with logistics partners include requirements to protect local roads and observe driving discipline in populated areas. Regular self-assessment: The company conducts an annual review of social impact. To date, no substantiated complaints or long-term adverse effects on local communities have been identified.
Risk Rating justification	The risk of negative social or community impacts in the company's biomass supply chains in Latvia is assessed as low. This conclusion is based on: • Strong national legislation ensuring public participation, community rights, and protection of infrastructure, including the Environmental Protection Law, Environmental Impact Assessment Law, Protection Zone Law, Forest Law, Municipalities Law, and Road Traffic Laws. • Clear legal provisions guaranteeing public access to forests for recreation, foraging, and cultural activities, with restrictions on forest operations near settlements, historical sites, and infrastructure. • The company plans operations and transport logistics to minimize noise, dust, and other disturbances to local communities. • No substantiated complaints or incidents causing long-term negative impacts on local communities have been reported. A detailed risk assessment is available upon request.
Risk Rating	Low Risk

Latvia Latvia	Indicator
4.2.2	Feedstock sourcing shall positively contribute to the local economy, including employment.
Supply Base Verifiers	Not applicable to 'Landscape' and 'Urban, domestic and infrastructure' feedstock categories according to the SBP Instruction Document 1A.
Risk Rating justification	Not applicable to 'Landscape' and 'Urban, domestic and infrastructure' feedstock categories according to the SBP Instruction Document 1A.
Risk Rating	Low Risk

Latvia Latvia	Indicator
4.2.3	Food, water supply or high conservation values (HCV) that are essential for the fulfilment of basic needs of communities shall be maintained or enhanced
Supply Base Verifiers	Not applicable to 'Landscape' and 'Urban, domestic and infrastructure' feedstock categories according to the SBP Instruction Document 1A.
Risk Rating justification	Not applicable to 'Landscape' and 'Urban, domestic and infrastructure' feedstock categories according to the SBP Instruction Document 1A.
Risk Rating	Low Risk

Latvia Latvia	Indicator
4.2.4	Legal, customary, and traditional tenure and use rights of Indigenous Peoples and local communities related to the Supply Base shall be identified, documented, and respected.
Supply Base Verifiers	Rights status verification: Before harvesting biomass or timber, the company verifies the legal status of the supply base, including checking origin documents and forest management plans where servitudes and restrictions are recorded. Public access protection: Operations are planned to ensure public roads and footpaths used by local communities for traditional activities remain accessible. Conflict monitoring: The company maintains communication with landowners and municipalities. To date, no conflicts related to traditional land-use rights have been documented. Certified supply chains: A large share of biomass comes from FSC or PEFC certified forests, which provide strong guarantees for respecting traditional and community rights (in line with FSC Principle 3). Preservation of cultural and historical values: Harvesting practices include buffer zones around historical burial sites, sacred places, and other traditionally significant objects, as recorded in environmental data management systems. Records maintained by the company:

	1. Land register extracts and site plans (if applicable). 2. Felling permits and origin documentation. 3. Maps showing servitudes and protected zones. 4. Self-assessment reports on compliance with community rights.
Risk Rating justification	The risk of violating legal, customary, or traditional land-use rights in the company's biomass supply chains in Latvia is assessed as low. This conclusion is based on: • In the Latvian context, there are no indigenous peoples in the classical sense (e.g., Sámi in Scandinavia), but there are strong local traditions and legal restrictions, including servitudes, access rights, and historically established resource use (e.g., hunting, berry picking, mushroom foraging). • A clear legal framework exists, including the Civil Law (Property Law part), Land Register Law, Forest Law, Hunting Law, Fisheries Law, and Protection Zone Law, ensuring recognition of local access rights and servitudes. • Most biomass is sourced from FSC or PEFC certified forests, which include requirements for respecting customary and community rights, providing strong verification under SBP audits. • Company operations ensure that public access routes, footpaths, and traditional resource areas are not blocked. • Historical and culturally significant sites are respected with buffer zones around cemeteries, sacred places, and other traditional sites. A detailed risk assessment is available upon request.
Risk Rating	Low Risk

Latvia Latvia	Indicator
4.2.5	Mechanisms shall be in place for resolving grievances and disputes relating to tenure and use rights of the forest and other land management practices.
Supply Base Verifiers	Internal complaints mechanism: The company has an official procedure ("SBP Certification System Description") that defines how complaints are received, registered, and resolved. Responsibility: The CEO coordinates all incoming complaints from employees, neighbors, municipalities, or third parties and ensures a justified resolution. Submission channels: Complaints can be submitted via the company website. Each complaint is documented and tracked until fully resolved. Supply chain oversight: Cooperation agreements with suppliers and logistics partners include a requirement to immediately report any conflicts with local communities or state authorities. Regular self-assessment: The company conducts an annual internal review to ensure no unresolved disputes arise from land management practices. To date, no cases requiring litigation or causing long-term negative impact have

	been recorded. Records maintained by the company: 1. Complaint registration log (including all received complaints and their resolution). 2. Correspondence with the State Forest Service and other supervisory authorities. 3. Documented “SBP Certification System Description” procedure. 4. Self-assessment reports and audit protocols.
Risk Rating justification	The risk of unresolved disputes or complaints in the company’s biomass supply chains in Latvia is assessed as low. This assessment is based on: • A strong administrative and legal framework in Latvia addressing disputes, including civil law, administrative procedures, and oversight by state authorities (State Forest Service – VMD, State Environmental Service – VVD, municipal authorities, and the Ombudsman). • Clear procedures for filing complaints related to illegal logging, environmental pollution, land use conflicts, and neighboring property issues. • Internal company procedures and annual monitoring ensure that all incoming complaints are recorded, investigated, and resolved. • The company has a defined management responsibility for complaint handling, reducing the risk of unresolved conflicts that could impact operations or reputation. A detailed risk assessment is available upon request.
Risk Rating	Low Risk

Latvia Latvia	Indicator
4.2.6	Where Indigenous Peoples’ rights are identified in the Supply Base, and Free Prior and Informed Consent (FPIC) has not been achieved for the proposed and planned activities, a consultation and, if required, accommodation process shall be put in place.
Supply Base Verifiers	Ensuring awareness: The company ensures that operations in the supply base comply with municipal land-use plans and do not conflict with local community interests. Conflict identification: Before biomass procurement or harvesting, the company assesses whether there are any existing disputes over land use or environmental protection in the region that would require additional consultations. Certified supply chains: Most biomass supplies come from FSC or PEFC certified sources, where FPIC principles and consultation processes are already verified by independent audits. Internal monitoring: The company regularly conducts self-assessments to ensure no complaints regarding information gaps or disregard for

	community interests are reported.
Risk Rating justification	The risk of non-compliance with the FPIC principle in the company's biomass supply chains in Latvia is assessed as low. This conclusion is based on: • No indigenous peoples' groups (according to ILO Convention No. 169) with distinct traditional rights requiring specific FPIC procedures have been identified in Latvia. • A strong legal framework ensures public participation, including the Environmental Protection Law, the Environmental Impact Assessment Law, and the Spatial Development Planning Law, which provide for prior information and consultation in the public interest. • The company ensures that its biomass activities comply with municipal plans and do not conflict with local community interests. • Certified supply chains (FSC, PEFC) ensure that FPIC principles and consultation processes are independently verified through audits. • Internal monitoring confirms that no complaints have been received regarding lack of information or disregard for community interests. A detailed risk assessment is available upon request.
Risk Rating	Low Risk

Latvia Latvia	Indicator
4.2.7	Designated cultural heritage sites shall be preserved.
Supply Base Verifiers	Pre-operation site checks: Before starting work, especially on non-forest lands or new sites, the company verifies the presence of cultural heritage using the NKMP public database (karte.mantojums.lv). Coordination with authorities: If planned activities are near a cultural heritage site or protection zone, the company informs NKMP and obtains required approvals or guidance on operational specifics. Operational guidelines and staff training: Forest machinery operators are instructed to protect historical elements. Work is halted if potential unknown heritage objects are found until verification is completed. Certified supply chain: Major suppliers are required to have FSC or PEFC certification, including High Conservation Value (HCV 6) identification and protection, providing an additional guarantee within the SBP framework. Annual self-assessment: The company annually verifies that logging or chipping operations have not damaged cultural heritage sites. To date, no administrative or criminal cases have been recorded for damaging such sites.
Risk Rating justification	The risk of damaging cultural heritage sites in the company's biomass supply chains is assessed as low. This conclusion is based on: • Strict national regulations in Latvia governing the protection of cultural heritage, including legal restrictions and mandatory protection zones around monuments. • Availability of publicly accessible digital maps and databases

	maintained by the National Heritage Board (NKMP), allowing precise identification of archaeological, architectural, and historical monuments. • High legal and administrative penalties for damaging cultural heritage, which are well understood and actively avoided by the company and its partners. • Implementation of internal procedures, audits, and certified supply chain requirements (FSC, PEFC) that include identification and protection of High Conservation Value forests (HCV 6 – cultural values). • Operational instructions and monitoring to ensure field operators recognize and preserve historical elements (e.g., foundations, old roads), and work is stopped if unknown potential heritage objects are discovered. A detailed risk assessment is available upon request.
Risk Rating	Low Risk

Annex 2: EU RED Supply Base Evaluation

Countries where EU RED Supply Base Evaluation is used	
Country	Latvia
Area	Latvia
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-LV-FOR_v1.1 REDIII Level A for Latvia 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-LV-FOR_v1.1 REDIII Level A for Latvia 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	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	SBP-RED-EU-LV-FOR_v1.1 REDIII Level A for Latvia 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	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	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 ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-EU-LV-FOR_v1.1 REDIII Level A for Latvia FOR
Level B management system at the level of the forest sourcing area	N/A

Countries where EU RED Supply Base Evaluation is used

Country	Latvia
Area	Latvia
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-LV-FOR_v1.1 REDIII Level A for Latvia 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-LV-FOR_v1.1 REDIII Level A for Latvia 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	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	SBP-RED-EU-LV-FOR_v1.1 REDIII Level A for Latvia 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	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. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land</i>	

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	SBP-RED-EU-LV-FOR_v1.1 REDIII Level A for Latvia FOR
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

The organization conducts verification and monitoring of suppliers of secondary biomass, based on the procedure developed by LSEZ Ltd Laskana. The process includes a supplier audit, a self-declaration, and a completed questionnaire containing information on the origin, legality, and species of the wood.

Suppliers must demonstrate that the material was not intentionally produced as secondary biomass and that the production process has not been deliberately modified to generate additional secondary material. Suppliers ensure compliance with national and regional legislation and can provide documentation for all deliveries.

Currently, LSEZ Ltd Laskana works with three suppliers, providing material with FSC Mix Credit and PEFC 100% claims. All suppliers are documented, self-declarations are on file, and all incoming material is visually inspected upon receipt.

Feedstock inspection and classification upon receipt

Upon receipt, all delivered processing residues are visually inspected and classified as secondary feedstock. LSEZ Ltd Laskana maintains all procurement and related documentation for biomass supplies. Supplied volumes are compared with the actual biomass produced to verify that the material has undergone the required post-processing. Inspection and classification of raw materials are carried out in accordance with the procedure developed by LSEZ Ltd Laskana.

Supplier audit for processing residues and post-consumer feedstock

The organization conducts annual audits of SBP secondary biomass suppliers. During these audits, all raw materials supplied by the audited supplier are evaluated and verified. Documentation and other evidence related to the volume, quality, origin, and compliance of the raw materials with SBP RED EU secondary biomass standards are checked. The procedure for auditing biomass post-processing suppliers is defined in the company's internal procedure.

Suppliers acknowledge that auditors from certification bodies, inspectors from authorities (to assess auditor performance), or SBP may verify compliance with SBP requirements at the company's facilities.

LSEZ Ltd Laskana works with three processing residue suppliers, all of whom have undergone on-site audits. The audit process is fully documented, and all feedstock is visually inspected. Annual supplier audits are planned and carried out to ensure ongoing compliance with SBP standards.

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).

Country: Latvia - Latvia

Not Applicable - only urban and landscape feedstock is used

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).