



Supply Base Report:

Rainert RL OÜ 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:	Rainert RL OÜ
Producer address:	Nurme 16, 69402 Abja-Paluoja, Estonia
SBP Certificate Code:	SBP-08-75
Geographic position:	58.131343, 25.355709
Primary contact:	Margit Lääne, +372 514 1096, rainertl@hotmail.ee
Company website:	
Date report finalised:	08 Jun 2026
SBR reporting period from:	01 May 2025
SBR reporting period to:	30 Apr 2026
Name of the Certification Body:	Preferred by Nature OÜ
Certification Body Approval date:	21 Aug 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. v2.1, Instruction Document EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413 v2.0
Feedstock origin (countries)	Estonia (Whole country)
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

Rainert RL OÜ was established in 2010 and is located in Abja-Paluoja. The company's main activities are forest management and wood processing. Its primary area of operation is Estonian forests, where roundwood and wood chips are sourced. Rainert RL OÜ owns two sawmills: one located in Abja-Paluoja and the other on the Puidu property in Äriküla village, Mulgi municipality. In addition, the company operates a wood chip yard on Kase 18 Street in Pärnu.

Besides roundwood, Rainert RL OÜ is also engaged in the production of wood chips and sawn timber. Under the scope of the FSC certificate, the company sells roundwood and wood chips from forest storage sites according to the transfer system, and sells chips and sawdust from its two sawmills according to the FSC credit system.

Companies own forest are certified according to PEFC FM standard.

SBP feedstock is sourced from certified and uncertified private forests. Approximately 1% of feedstock is sourced from cleaning process of infrastructure objects and from cleaning process of agricultural land (mainly from ditch cleaning).

Biomass from agricultural land is not sourced as part of the agricultural activity but as cleaning the agricultural land (old hayland and unused fields) from bushes and young trees. No legislation is regulating such cleaning process (except protected habitats where Nature conservation act and conditions set by Board of Environment have to be followed). Such removal of bushes and young trees is done with forestry machinery and it contains only cutting the material above the ground. Removal of roots is not part of that process. Same practices are implemented as its done in the forest. Also same origin related data is collected as it is done with forest biomass. With such management practices used it is not possible to do more damage to the soil compared to normal agricultural activities that could take place on that land. Therefore all TOF Material is classified as Urban and Landscape Feedstock.

For TOF material the same SBP regional risk assessments are used as for forest material (see Revised Regional Risk Assessment for Estonia V2.0). Rainert RL considers the SBP risk assessment results adequate and sufficient to be used also for non-forest land. Same risk mitigation activities apply for non-forest land and it is considered more stricter approach then creating separate risk assessment for non-forest land.

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

Number of employees: 14

Annual maximum production capacity (metric tonnes): 80000

Number of direct feedstock suppliers: 14

Approximate number of feedstock sub-suppliers: 0

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

Rainert RL is harvesting the material from its own forests or is buying its feedstock directly from forest owners or logging companies who are selling the residues or firewood in the forest stock.

The company sources feedstock from suppliers who operate under strict compliance with national laws and sustainability standards. In Estonia the material is covered by the Supply Base Evaluation (SBE) under the SBP certificate scope.

Origin to felling site is always known and supported by documentation. Incoming and outgoing material is tracked through companies accounting system and state electronic waybill system EVR that records each truck load's origin, volume, and end-point, providing complete traceability of feedstock movements. For wood chips paper waybills are used where also full origin information and traceability is provided.

Material is also physically reviewed by companies worker before the purchase.

Material from private forests is usually bought as stored next to felling site, segregation of the material on the felling site is always controlled by companies workers. Small portion also comes from non-forest land.

Material coming from companies own forests has also all needed origin and transport documentation and material from different properties (in case they are next to each other) is kept separately.

Chipping of the SBP feedstock is done onsite in the forest storage yards and wood chips are transported directly to destination ports or company storage yard. Chipping and transport is done by companies own trucks. If needed contractors are used.

Companies involved in transporting of the feedstock are providing needed information of the transport distances and this info is recorded by the company.

Company has full control of the feedstock starting from the forest until the sales point – material belongs to company already from forest stock and due to that, risk of mixing with other material is low.

2.2 Detailed description of the Supply Base

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

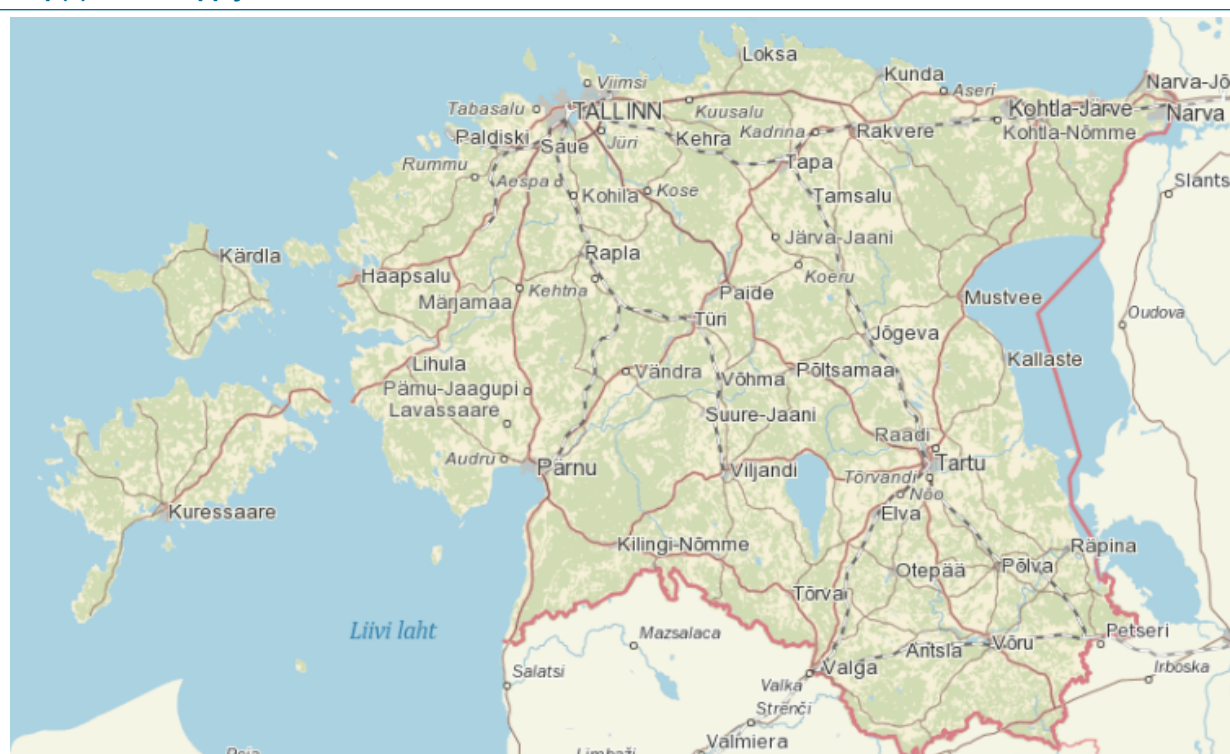
Annex 1 is generated by the system if the SBP SBE is used without Regional Risk Assessment(s) (RRAs). In case RRA(s) is used, further details shall be given only in section 3 below.

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

Country	Estonia
Area/Region	Whole country
Exclusions	None
Feedstock types	Primary feedstock
Feedstock Product Groups	Forest feedstock (1A), Trees outside forest (TOF) - Urban and landscape feedstock (2A)
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)
Provide a concise summary of why a SBE was determined to be required or not required here:	
In order to sell material as SBP compliant feedstock company has decided to add SBE to the scope of certificate. Input to SBP feedstock is certified and uncertified material.	

Feedstock types included in SBE:	Primary feedstock
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):	2.3250

Map(s) of the Supply Base area:



Source: Metsaportaali

2.3 Feedstock information

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

Betula pendula	Silver birch
Betula pubescens	Downy birch
Populus tremula	Aspen
Alnus glutinosa	Black alder
Alnus incana	Grey alder
Salix spp	Willow
Prunus padus	Bird Cherry
Picea abies	Spruce
Corylus avellana	Hazelnut

- 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 - Majority
Explanation: In Estonia some of the sanitary cutting was done due to spruce bark beetle attacks and storm damage.
- e. **Hardwood (i.e. broadleaf trees): specify proportion of feedstock from (%):** 95.00
- f. **Softwood (i.e. coniferous trees): specify proportion of feedstock from (%):** 5.00
- g. **Proportion of feedstock composed of or derived from saw logs by weight (%):** 0.00
- h. **Indicate how you determine the proportion of saw log:** Specification used by the sawmill closest to where the wood was grown.
- i. **Roundwood from fellings from forests with > 40 yr rotation times - Average % volume of fellings delivered to BP (%):** 20.00
- 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:** 0
Physical form of the feedstock: N/A
- n. **Share of SBP-recognised system claim for processing residues:**
- o. **Volume of post-consumer feedstock:** 0
Physical form of the feedstock: N/A
- p. **Estimated amount of EU RED-compliant sustainable feedstock that could be collected annually by the BP:** 80000 tonnes
- q. **What is the estimated amount of EU RED-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated):** 4000000.00 m³
Explanation: Felling rate is around 12 milj. Out of that approximately 1/3 is firewood and forest residues.

3 Supply Base Risk Assessments and Risk Management Measures

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

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

3.1 Summary of the Supply Base Evaluation

To reduce the risk of sourcing from high conservative value forests and meet the demand for SBP-Compliant biomass Rainert RL OÜ (RL) will undertake a supply base evaluation for primary feedstock that is originating from Estonia according to the SBP Framework Standard 1: Feedstock Compliance Standard and Standard 2: Verification of SBP - compliant Feedstock.

The risk assessment of the SBE is based on the Revised Regional Risk Assessment for Estonia V2.0 as published on 12 July 2024.

Risk assessments are available on SBP homepage: <https://sbp-cert.org/documents/normative-documents/version-2/risk-assessments/>

The scope of the SBE was chosen based on the availability of the SBP - endorsed Regional Risk assessment whereas the possibility to mitigate the identified "specified risk" with reasonable efforts was considered. RL considers the risk assessment results adequate and sufficient to be used also for non-forest land. Same risk mitigation activities apply for non-forest land and it is considered more stricter approach than creating separate risk assessment for non-forest land.

Biomass from agricultural land is not sourced as part of the agricultural activity but as cleaning the agricultural land (old hayland and unused fields) from bushes and young trees. No legislation is regulating such cleaning process (except protected habitats where Nature conservation act and conditions set by Board of Environment have to be followed. Such removal of bushes and young trees is done with forestry machinery and it contains only cutting the material above the ground. Removal of roots is not part of that process. Same practices are implemented as its done in the forest. Also same origin related data is collected as it is done with forest biomass. With such management practices used it is not possible to do more damage to the soil compared to normal agricultural activities that could take place on that land. Therefore all TOF Material is classified as Urban and landscape feedstock.

For TOF material the same SBP regional risk assessments are used as for forest material (see Revised Regional Risk Assessment for Estonia V2.0). RL considers the SBP risk assessments results adequate and sufficient to be used also for non-forest land. Same risk mitigation activities apply for non-forest land and it is considered more stricter approach then creating separate risk assessment for non-forest land.

Regarding RED III risk assessment, company is using draft RED III risk assessment provided by SBP. Justification for using it comes from SBP <https://sbp-cert.org/documents/consultation-documents/archive/rediii-level-a-risk-assessment-for-forest-feedstock/>. See in bold "**Biomass Producers can use the consultation draft to demonstrate compliance with the REDIII Level A requirements. If any of the risk ratings in the final REDIII Level A Risk Assessment differ from those in the consultation draft, the Biomass Producer must update its Supply Base Evaluation accordingly.**" Company will follow that approach and requirements set by SBP. In case there will be any changes in the risk assessment, company will update its SBE accordingly, as required above.

3.2 Conflicts with applicable national and sub-national legislation

No conflicts. Local legislation has become more strict compared to the time when risk assessment was created. Some of the risks will be avoided via following legal requirements.

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: Estonia	
Area/sub-scope:	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☒ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.1.1 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.	
Description of the specific risk:	
From SBP risk assessment: "Risk conclusion and justification The above analysis suggests that although the key species, ecosystems, and HCVs in forests are generally identified, some WKHs and Natura 2000 forest land are not inventoried and thus this indicator is assigned a specified risk." Risk is related to WKH s and Natura 2000 forest habitats on Natura 2000 protection areas that have not been inventoried.	
Mitigation measure:	
Rainert RL (RL) will verify all deliveries of primary feedstock which have been harvested in Estonia. Regarding material coming from FSC certified forests with FSC 100% claim there is no "green line" to become SBP compliant feedstock. With such material additional control is done to verify that FSC certified forest owner has procedures in place to identify and to avoid fellings in WKHs. Same goes for 100% PEFC	

certified material from own forest and from other suppliers. Regarding material from own PEFC certified forests, company is aware that WKH related risks are mitigated via certification and company has overview that they don't cut WKHs.

RL will use a list of approved suppliers, delivery documents, publicly available official databases and databases provided by competent authorities, FSC Estonia and expert reports, to verify that the delivered primary feedstock has not been sourced from areas known to include any WKHs.

RL will carry out the following control procedure within the SBE prior to the reception and registration of primary feedstock:

Full origin data– felling permit, waybill, handover act - is collected and reviewed to make sure material is sourced legally. If some of the needed documentation is missing material can not be sourced.

Origin information provided is verified via state registers (Forest registry, waybill database EVR, kinnisturaamat).

RL is controlling all FMUs, before purchasing them, from databases (Deskis, Forest registry) to make sure there is no WKH present. If WKH is identified, material is not sourced.

Additionally organization is conducting sample based field visits in sourcing areas before harvesting to identify whether compartment has WKH elements or not.

Sampling rate used is $0,3 \times \sqrt{\text{nr of FMUs}}$. Each field visit will be protocolled. Sampling is taken from the whole nr of FMUS.

Sampling rate is based on the FSC FM sampling requirements (FSC-STD-20-007 V4-0 EN). Also the same sampling rate is used in FSC CW DDS risk mitigation and this has been approved by those experts approving these risk mitigation measures.

In case person doing the field visit identifies that the felling site classifies as WKH then the material will not be sourced from that compartment, if it does not qualify as WKH then material can be sourced from that compartment.

The outcome of these control measures is to eliminate material from potential WKHs .

Natura 2000 forest habitat types on Natura 2000 protection areas:

Before issuing felling permit to Natura 2000 protection area, Estonian Environmental board is evaluating if there is Natura 2000 forest habitat type on that compartment or not. It is not allowed to issue felling permits to Natura 2000 forest habitat types any more.

Since Environmental Board has Natura habitat experts doing the evaluation before issuing the felling permit, RL needs to make sure that on Natura 2000 protection areas there is active felling permit available, meaning Environmental Board has made it clear that there is no Natura 2000 forest habitat on that compartment.

The outcome of these control measures is to eliminate material from unidentified Natura 2000 forest habitats on Natura 2000 protection areas .

Monitoring and outcomes:

The results of the field visits are reviewed to see how many WKHs were identified. Also the number of Felling permits that were pushed back by Environmental board due to the existence of Natura 2000 forest habitats will be reviewed.

In case there will be new information that would make the risk mitigation activities more effective then this information will be considered.

Country: Estonia	
Area/sub-scope:	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☒ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.1.2 Threats to and impacts on the identified key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified and evaluated.	
Description of the specific risk:	
From SBP risk assessment: "Risk conclusion and justification The above analysis suggests that some WKHs and Natura 2000 forest land are not inventoried and thus, threats to and impacts on the identified key species, habitats, ecosystems, and HCV pertaining to biodiversity in these areas are not known. Therefore, the risk class for this indicator is assessed to be specified." Risk is related to HCV values in the WKHs and Natura 2000 forest habitats on Natura 2000 protection areas that have not been inventoried. So in case risk related unidentified WKHs and Natura 2000 forest habitats on Natura 2000 protection areas is mitigated as mentioned under 2.1.1 then related risk HCV values will be also mitigated. Same risk mitigation process as mentioned under 2.1.1 is used to mitigate the risk related to 2.1.2.	
Mitigation measure:	
Rainert RL (RL) will verify all deliveries of primary feedstock which have been harvested in Estonia. Regarding material coming from FSC certified forests with FSC 100% claim there is no "green line" to become SBP compliant feedstock. With such material additional control is done to verify that FSC certified forest owner has procedures in place to identify and to avoid fellings in WKHs. Same goes for 100% PEFC certified material from own forest and from other suppliers. Regarding material from own PEFC certified forests, company is aware that WKH related risks are mitigated via certification and company has overview that they don't cut WKHs. RL will use a list of approved suppliers, delivery documents, publicly available official databases and databases provided by competent authorities, FSC Estonia and expert reports, to verify that the delivered primary feedstock has not been sourced from areas known to include any WKHs.	

RL will carry out the following control procedure within the SBE prior to the reception and registration of primary feedstock:

Full origin data– felling permit, waybill, handover act - is collected and reviewed to make sure material is sourced legally. If some of the needed documentation is missing material can not be sourced.

Origin information provided is verified via state registers (Forest registry, waybill database EVR, kinnisturaamat).

RL is controlling all FMUs, before purchasing them, from databases (Deskis, Forest registry) to make sure there is no WKH present. If WKH is identified, material is not sourced.

Additionally organization is conducting sample based field visits in sourcing areas before harvesting to identify whether compartment has WKH elements or not.

Sampling rate used is $0,3 \times \sqrt{\text{nr of FMUs}}$. Each field visit will be protocolled. Sampling is taken from the whole nr of FMUS.

Sampling rate is based on the FSC FM sampling requirements (FSC-STD-20-007 V4-0 EN). Also the same sampling rate is used in FSC CW DDS risk mitigation and this has been approved by those experts approving these risk mitigation measures.

In case person doing the field visit identifies that the felling site classifies as WKH then the material will not be sourced from that compartment, if it does not qualify as WKH then material can be sourced from that compartment.

The outcome of these control measures is to eliminate material from potential WKHs .

Natura 2000 forest habitat types on Natura 2000 protection areas:

Before issuing felling permit to Natura 2000 protection area, Estonian Environmental board is evaluating if there is Natura 2000 forest habitat type on that compartment or not. It is not allowed to issue felling permits to Natura 2000 forest habitat types any more.

Since Environmental Board has Natura habitat experts doing the evaluation before issuing the felling permit, RL needs to make sure that on Natura 2000 protection areas there is active felling permit available, meaning Environmental Board has made it clear that there is no Natura 2000 forest habitat on that compartment.

The outcome of these control measures is to eliminate material from unidentified Natura 2000 forest habitats on Natura 2000 protection areas .

Monitoring and outcomes:

The results of the field visits are reviewed to see how many WKHs were identified. Also the number of Felling permits that were pushed back by Environmental board due to the existence of Natura 2000 forest habitats will be reviewed.

So there will be statistics how many new WKHs and Natura 2000 forest habitat types were identified and protected by RL.

Also new information about HCVs not known earlier will be available from additional inventories and field visits conducted.

In case there will be new information that would make the risk mitigation activities more effective then this information will be considered.

Country: Estonia	
Area/sub-scope:	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☒ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.1.3 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.	
Description of the specific risk:	
From SBP risk assessment: "Risk conclusion and justification As the above analysis suggests, the enhancement and maintenance of key species, habitats, ecosystems, and HCVs pertaining to biodiversity in some WKHs and Natura 2000 forest land cannot be guaranteed. Therefore, the level of risk for this indicator is assessed as "specified"." Risk is related to cutting of WKHs and Natura 2000 forest habitats on Natura 2000 protection areas.	
Mitigation measure:	
Rainert RL (RL) will verify all deliveries of primary feedstock which have been harvested in Estonia. Regarding material coming from FSC certified forests with FSC 100% claim there is no "green line" to become SBP compliant feedstock. With such material additional control is done to verify that FSC certified forest owner has procedures in place to identify and to avoid fellings in WKHs. Same goes for 100% PEFC certified material from own forest and from other suppliers. Regarding material from own PEFC certified forests, company is aware that WKH related risks are mitigated via certification and company has overview that they don't cut WKHs. RL will use a list of approved suppliers, delivery documents, publicly available official databases and databases provided by competent authorities, FSC Estonia and expert reports, to verify that the delivered primary feedstock has not been sourced from areas known to include any WKHs. RL is using DESKIS software that is used to analyze every feedstock load to verify if there is any WKHs or Natura 2000 forest habitat types on the sourcing area. Regarding the Natura 2000 forest habitat types this will be a double control, since the Environmental Board will not issue any felling permits to such areas. RL sources feedstock from pre-qualified contractual partners with verified competence and resources to also implement equal mitigation measures in upstream supply chains.	

RL performs following steps before accepting the feedstock:

1. Has the supplier signed a code of conduct?
 - 1.1 If yes, go to 2.
 - 1.2 If no, the products cannot be sourced.
2. Can the products be traced back to the logging site in forest?
 - 2.1 If yes, go to 3.
 - 2.2 If no, the products cannot be sourced.
3. Is there a felling permit issued?
 - 3.1 If yes, go to 5
 - 3.2 If no, go to 4.
4. Fellings without felling permit.
 - 4.1 If there are no WKHs or Natura 2000 forest habitats on the FMU according to the database, the products can be sourced.
 - 4.2 If there is WKH or Natura 2000 forest habitat on FMU, the products cannot be sourced.
5. Does the logging site defined in the felling permit, provided with the supplied material, match with the WKH or Natura 2000 forest habitat type area?
 - 5.1 If yes, the products cannot be sourced.
 - 5.2 If no, the products can be sourced.

Monitoring and outcomes:

The results of the controls conducted are reviewed to see how many WKHs and Natura 2000 forest habitats there were on the planned sourcing areas. Also the number of Felling permits that were pushed back by Environmental board due to the existence of Natura 2000 forest habitats will be reviewed.

So there will be statistics how many new WKHs and Natura 2000 forest habitat types were identified and protected by RL.

In case there will be new information that would make the risk mitigation activities more effective then this information will be considered.

Country: Estonia

Area/sub-scope:

Risk Assessment used:

- ☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim
- ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim
- ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim
- ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed
- ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim
- ☒ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed
- ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed
- ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed
- ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim
- ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim
- ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim

	☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
3.2.3 feedstock shall not be sourced from forest areas in the Supply Base which, according to local definitions or norms, are classified as having combined attributes of high carbon stocks and high conservation value (HCV).	
Description of the specific risk:	
From SBP risk assessment:” Risk conclusion and justification Based on the evidence reviewed, the risk for non-compliance with this indicator is concluded to be specified. Related to the risk conclusion, see also indicators 2.1.1 and 2.1.3.” There is a risk that areas with <u>combined attributes of HCV and high carbon stock</u> remain unidentified. Here with HCVs the WKHs and Natura 2000 forest habitat types on Natura 2000 protection areas are ment. So if the risk of identification of WKHs and Natura 2000 forest habitat types on natura 2000 protection areas (see 2.1.1) is mitigated and also risk of cutting WKHs and Natura 2000 forest habitat types on natura 2000 protection areas (see 2.1.3) is mitigated then also risk regarding 3.2.3 is mitigated. Same risk mitigation as for 2.1.1 and 2.1.3 applies.	
Mitigation measure:	
Same as for 2.1.1 and 2.1.3 to mitigate risk related HCV1 and HCV3. HCV 2 - areas of large woodland territories: UNESCO world heritage sites, Ramsar sites, forests in strict nature reserves, biosphere reserves, reserves of national or regional parks. Mentioned protection objects are not a separate protection areas in Estonia (except national park as separate type of protection area) but those are kind of different status types of normal protection areas in Estonia like: Nature conservation area, Landscape conservation area etc. Majority of those protection areas have additional different statuses like Ramsar area, Natura bird area, Natura nature area etc. All those have their own protection regime with strict protection and limited management zones. Valuable areas (also wetlands and high carbon stock areas) are under strict protection zones and there is no management allowed and not possible to get felling permit. Related potential risks are mitigated via following restrictions set by Environmental Board. Important to make sure there is felling permit issued for material originating from such areas to make sure that any HCV values are not damaged(see also risk mitigation for 2.1.1 and 2.1.3). Board of Environment don't issue felling permit if there is a risk of damaging habitats or species on protection areas. HCV 4 and water protection zone related potential risks are mitigated by following legislation requirements to not conduct cutting in the 1-20m (depending on the natural water body type) wide strict protection zone. This is considered strict zone and removal of material can be done in special circumstances but not as a normal forest management. CAT 5 is N/A since there are no other indigenous people besides Estonians and no local communities who have fundamental needs related to forests. With HCV6 organization has not identified overlap with HCS. Most of the cultural objects that are established by people are on mineral soils where it is possible build or create parks (Manor parks, urban forests etc) or in case of natural historical sites these are also on places with good access and non-wet soils. Historical sites are usually not in high carbon value wetlands. Based on that no mitigation is required.	
Monitoring and outcomes:	
The results of the controls conducted are reviewed to see how many WKHs and natura 2000 forest habitats there were on the planned sourcing areas. Also the number of Felling permits that were pushed back by Environmental board due to the existence of Natura 2000 forest habitats will be reviewed.	

So there will be statistics how many new WKHs and Natura 2000 forest habitat types were identified and protected by LE.

In case there will be new information that would make the risk mitigation activities more effective then this information will be considered.

4 Stakeholder engagement

4.1 General description

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

Biomass Producer's stakeholder engagement end date: 30 May 2025

Total number of stakeholders contacted: 11

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

During the consultation, information about assessment and the SBR file was sent out to different stakeholders and stakeholder roof organizations. Different economic, social and environmental SH groups were covered. See the full list from Annex 1 - Lisa 1 Huvigrupid.

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

No comments or input was received from the stakeholders.

4.2 Response to stakeholder comments

5 Report updates and approval

This document is: Updated SBR (surveillance audits/scope-change audits)

Updated according to SBP STD v2.0 requirements.

Name	Margit Lääne
Title	Management representative
Date of report approval	08 Jun 2026

Annex 1: Detailed findings for Supply Base Evaluation indicators

Estonia Whole country	Indicator
1.1.1	Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.
Supply Base Verifiers	N/A
Risk Rating justification	Annex 1 covers TOF material only. For TOF material the same SBP regional risk assessments is used as for forest material (see Revised Regional Risk Assessment for Estonia V2.0) . See justification below. Rainert RL considers the SBP risk assessment results adequate and sufficient to be used also for non-forest land. Same risk mitigation activities apply for non-forest land and it is considered more stricter approach then creating separate risk assessment for non-forest land. Forest act is applicable in forest land only. Outside forest land, where TOF material is sourced, Nature conservation act applies and in case of infrastructure, relevant infrastructure legislation applies and that also covers maintenance of the infrastructure. All nature conservation related requirements come from Nature Conservation act that applies for both forest land and non-forest land. HCV objects and values are both monitored based on requirements from Nature Conservation Act, based on habitat directives and species protection legislation (that is also related to Nature Conservation Act). Monitoring and inventories are done based on the values identified. Relevant state authorities are responsible of conducting these inventories. Since the material sourced is same in forest and in TOF (low quality roundwood, forest residues, bushes etc) then also the machinery and techniques sourcing them are same. Same forestry companies and workers are sourcing this material in forest and also in TOF land. Same labour and H&S requirements apply. Since there is no technical solution developed for TOF material under Annex 1, all indicators in this annex (except 2.1.1; 2.1.2 and 2.1.3) are masked as Not Applicable (N/A). Risk rating is marked as low risk since N/A option is not available.
Risk Rating	Low Risk

Estonia Whole country	Indicator
1.1.2	Legal ownership of land and resource use rights shall be respected.
Supply Base Verifiers	N/A

Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Whole country	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	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Whole country	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	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Whole country	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	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Whole country	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	Same risk mitigation activities apply as described in SBR section 3 "Risk management measures", indicator 2.1.1
Risk Rating justification	Forest land risk rating is used. See the justification under 1.1.1.
Risk Rating	Specified Risk

Estonia Whole country	Indicator
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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	Same risk mitigation activities apply as described in SBR section 3 "Risk management measurers", indicator 2.1.2.
Risk Rating justification	Forest land risk rating is used. See the justification under 1.1.1.
Risk Rating	Specified Risk

Estonia Whole country	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	Same risk mitigation activities apply as described in SBR section 3 "Risk management measurers", indicator 2.1.3.
Risk Rating justification	Forest land risk rating is used. See the justification under 1.1.1.
Risk Rating	Specified Risk

Estonia Whole country	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	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Whole country	Indicator
2.2.2	Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Whole country	Indicator
2.2.3	Soil quality in the Supply Base shall be maintained or enhanced
Supply Base Verifiers	N/A
Risk Rating justification	N/A

Risk Rating	Low Risk
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Estonia Whole country	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	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Whole country	Indicator
2.2.5	Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Whole country	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	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Whole country	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	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Whole country	Indicator
2.2.8	Waste shall be disposed of in an environmentally appropriate manner.

Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Whole country	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	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Whole country	Indicator
2.2.10	Harvested areas shall be regenerated
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Whole country	Indicator
2.2.11	The impacts of natural processes such as fires, pests and diseases shall be managed.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Whole country	Indicator
2.2.12	Genetically modified trees shall not be used.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Whole country	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	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Whole country	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	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Whole country	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	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Whole country	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	Same risk mitigation activities apply as described in SBR section 3 "Risk management measures", indicator 3.2.3.
Risk Rating justification	Forest land risk rating is used. See the justification under 1.1.1.
Risk Rating	Specified Risk

Estonia Whole country	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	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Whole country	Indicator
4.1.1	Freedom of association and the right to collective bargaining shall be respected in the workplace.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Whole country	Indicator
4.1.2	Forced or compulsory labour shall not be used.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Whole country	Indicator
4.1.3	Child labour shall not be used.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia	Indicator
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Whole country	
4.1.4	Workers shall not be discriminated in hiring, remuneration, access to training, promotion, termination or retirement.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Whole country	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	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Whole country	Indicator
4.1.6	Working hours shall comply with legal requirements.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Whole country	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	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Whole country	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	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Whole country	Indicator
4.1.9	Mechanisms shall be in place for resolving grievances and disputes in the workplace.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Whole country	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	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Whole country	Indicator
4.2.1	Negative social and community impacts shall be identified and avoided.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Whole country	Indicator
4.2.2	Feedstock sourcing shall positively contribute to the local economy, including employment.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Whole country	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	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Whole country	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	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Whole country	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	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Whole country	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	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Whole country	Indicator
4.2.7	Designated cultural heritage sites shall be preserved.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Annex 2: EU RED Supply Base Evaluation

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

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	: a) company does not use roots and stumps in their biomass production. It is not common practice to remove roots and stumps during forest management activities but if such material is offered then it is not accepted for biomass production. b) company does not source material from forests that could be defined as primary or old growth forest. In Estonia, the OGF and primary forests are expected to be found within Woodland Key habitats (WKHs), Natura 2000 sites and other protected forests, so same risk mitigation activities apply as mentioned in SBR for mitigation of risks related to indicators 2.1.1; 2.1.2; 2.1.3 of “SBP Revised Regional risk Assessment for Estonia v2.0”.
(v) That harvesting maintains or improves the long-term production capacity of the forest.	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-EU-EE-FOR_v1.1 REDIII Level A for Estonia FOR
Level B management system at the level of the forest sourcing area	N/A
(vi)¹ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(a) primary forest and other wooded land and old growth forest, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located. If there is no definition of old growth forest at the national level, then the following definition shall apply: A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.</i>	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	**Specific Risk description:** Risk is related sourcing material from highly biodiverse forest, especially from WKHs and Natura 2000 forest habitats. **Companies Activities:** Same risk mitigation activities are used as mentioned in SBR for mitigation of risks related to indicators 2.1.1; 2.1.2; 2.1.3 of “SBP Revised Regional risk Assessment for Estonia v2.0”.
(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.

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:

(b) **highly biodiverse forest** and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	**Specific Risk description:** Risk is related sourcing material from highly biodiverse forest, especially from WKHs and Natura 2000 forest habitats. **Companies Activities:** Same risk mitigation activities are used as mentioned in SBR for mitigation of risks related to indicators 2.1.1; 2.1.2; 2.1.3 of “SBP Revised Regional risk Assessment for Estonia v2.0”.

(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	SBP-RED-EU-EE-FOR_v1.1 REDIII Level A for Estonia FOR
Level B management system at the level of the forest sourcing area	N/A

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

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

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

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level
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	☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	*Specific Risk description:* Risk is related to sourcing biomass from undrained peatlands. *Companies Activities:* Company verifies each load (in forest stock and from databases) and makes sure that the material is not originating from peat mining areas, where woody biomass is removed in order to drain the area for peat mining.
(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. <i>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).</i>	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-EU-EE-FOR_v1.1 REDIII Level A for Estonia FOR
Level B management system at the level of the forest sourcing area	N/A
(vi)⁶ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (5): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was peatland in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.</i>	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	**Specific Risk description:** Risk is related to sourcing biomass from undrained peatlands. **Companies Activities:** Company verifies each load (in forest stock and from databases) and makes sure that the material is not originating from peat mining areas, where woody biomass is removed in order to drain the area for peat mining.
(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-endorsed EU RED Level A risk assessment for Article 29(7) LULUCF_v1.4
Level B management system at the level of the forest sourcing area	N/A

Annex 2a: EU RED II Supply Base Evaluation

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

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

Verification and monitoring of suppliers

N/A

Feedstock inspection and classification upon receipt

N/A

Supplier audit for processing residues and post-consumer feedstock

N/A

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

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

Country: Estonia - Whole country

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).