



Supply Base Report:

Lumbar OÜ Re-assessment

Sustainable Biomass Program
sbp-cert.org



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

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

Document history

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1 Overview

Producer name:	Lumbar OÜ
Producer address:	Tehnika 15, Paikuse alev, 86609 Pärnu, Estonia
SBP Certificate Code:	SBP-08-31
Geographic position:	58.368404, 24.614764
Primary contact:	Anni Möts, +372 56 909 586, anni@lumbar.ee
Company website:	lumbar.ee
Date report finalised:	19 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:	16 Feb 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), Latvia (Northern part of 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

Lumbar OÜ is an Estonian company specialized in the production of wood chips.

Main activity today is buying forest residues and firewood and chip it for energy production. Company is mainly using their own chippers and trucks but also contractors if needed.

Company has FSC coc certificate since 2015.

SBP feedstock is sourced from certified and uncertified private forests. Small portion of feedstock is sourced from cleaning process of infrastructure objects and from cleaning process of agricultural 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 and Revised Regional Risk Assessment for Latvia v2.0). Same approach is used for Estonia and Latvia. Lumbar 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: 24

Annual maximum production capacity (metric tonnes): 121538

Number of direct feedstock suppliers: 266

Approximate number of feedstock sub-suppliers: 100

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

Lumbar 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 and Latvia the material is covered by the Supply Base Evaluation (SBE) under the SBP certificate scope. In Latvia, the material originates exclusively from FSC-certified forests, ensuring compliance with FSC sustainability principles.

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

Also physically reviewed by Lumbar 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 Lumbar workers. Small portion also comes from non-forest land. 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 Lumbar's own trucks. If needed contractors are used.

Companies involved in transporting of feedstock provide needed information of the transport distances and this info is recorded by Lumbar.

Lumbar has full control of the feedstock starting from the forest until the sales point – material belongs to Lumbar 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.

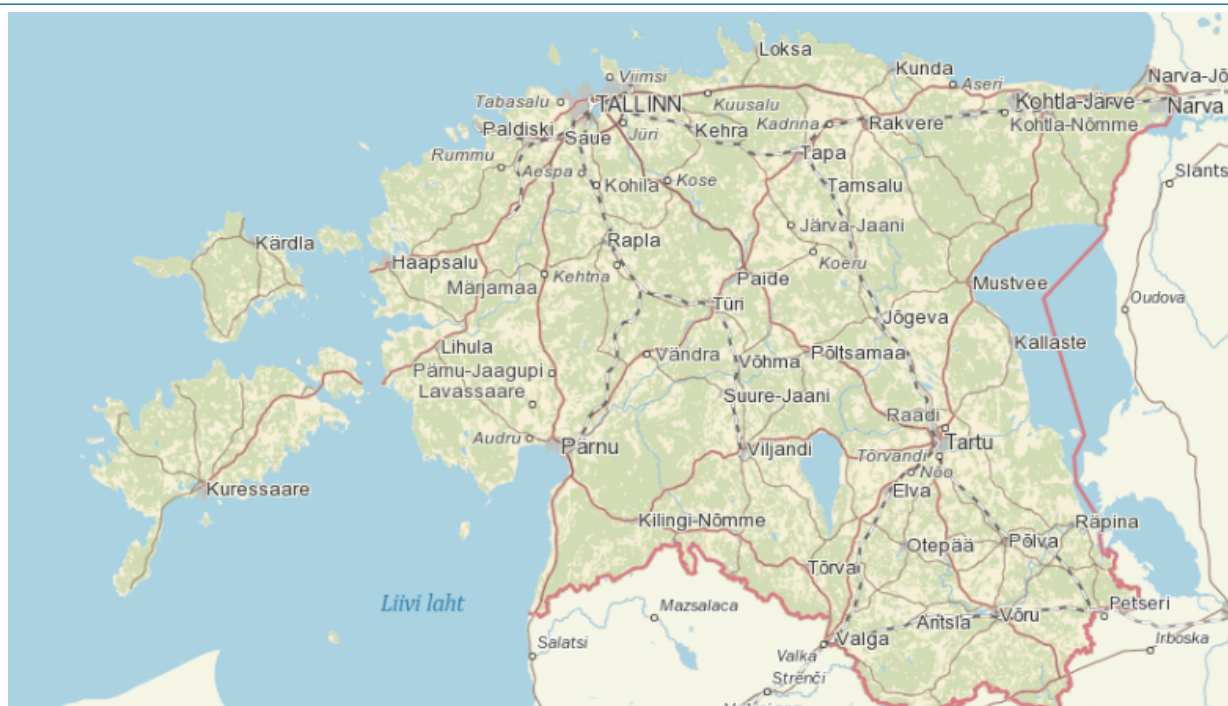
Annex 1 is generated by the system if the SBP SBE is used without Regional Risk Assessment(s) (RRAs). In case RRA(s) is used, further details shall be given only in section 3 below.

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

Country	Estonia
Area/Region	Whole Country
Exclusions	
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:

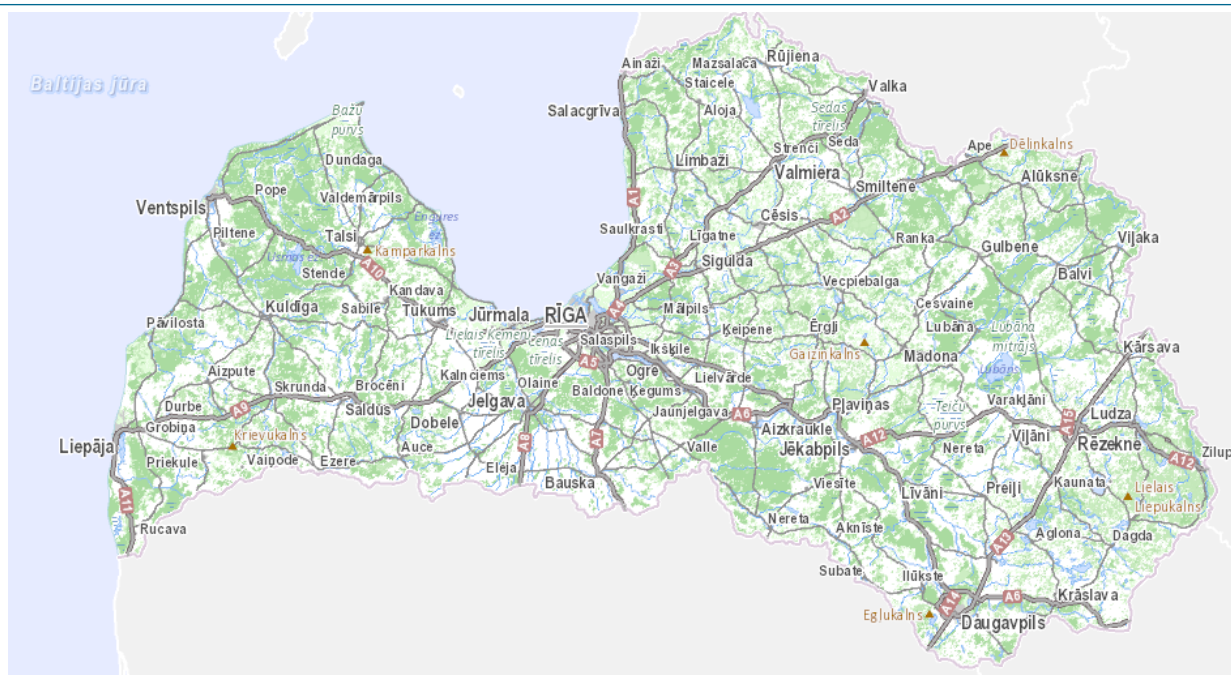


Source: Metsaportaali

Country	Latvia
Area/Region	Northern part of Latvia
Exclusions	N/A
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 feedstoc are certified and uncertified forests. 	
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):	3.4110

Map(s) of the Supply Base area:



Source: LVM GEO

2.3 Feedstock information

- a. **Total volume of Feedstock:** 400,000-600,000 m³
- b. **Volume of primary feedstock:** 400,000-600,000 m³
- c. **List of all the species in primary feedstock, including scientific name:**

Alnus glutinosa	Black Alder
Alnus incana	Black Alder
Betula pendula	Birch
Fraxinus excelsior	Ash
Acer platanoides	Maple
Picea abies	Spruce
Pinus sylvestris	Pine
Populus tremula	Aspen
Tilia cordata	Linden
Ulmus glabra	Elm
Salix spp	Willow
Larix spp	Larch
Quercus robur	Oak
Betula pubescens	Swamp Birch

- d. **Was the feedstock used in the biomass removed from a forest as part of a pest/disease control measure or a salvage operation?** Yes - Minority
Explanation: In Estonia and Latvia 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 (%):** 99.00
- f. **Softwood (i.e. coniferous trees): specify proportion of feedstock from (%):** 1.00
- 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 (%):** 100.00
- j. **Select forest type(s) where the primary feedstock was sourced from:** Mix of The Above
- k. **Select the main harvesting system(s) used for the sourced primary feedstock:** Mix of the above
- l. **Volume of primary feedstock from primary forest:** 0 m³
- m. **Volume of processing residues feedstock:** 0
Physical form of the feedstock: N/A
- n. **Share of SBP-recognised system claim for processing residues:**

o. Volume of post-consumer feedstock: 0

Physical form of the feedstock: N/A

p. Estimated amount of EU RED-compliant sustainable feedstock that could be collected annually by the BP:
400000 m³

q. What is the estimated amount of EU RED-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated): 4000000.00 m³

Explanation: Felling rate is around 12 milj. Out of that approximately 1/3 is firewood and forest residues. Production maximum we have evaluated based on our own production capacity.

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 Lumbar OÜ will undertake a supply base evaluation for primary feedstock that is originating from Estonia and Latvia 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 and Revised Regional Risk Assessment for Latvia 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 assessments whereas the possibility to mitigate the identified “specified risk” with reasonable efforts was considered.

Lumbar 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 and Revised Regional Risk Assessment for Estonia V2.0). Lumbar 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.

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:	
Lumbar 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. Lumbar 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. Lumbar 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).

Lumbar is controlling all FMUS before purchasing them from databases 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, Lumbar 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:

1. Suppliers devote themselves not to delivering biomass originating from HCV areas and the countries of origin are identified.
2. Suppliers are aware of threats to HCV areas in forests and are trained in using mitigation measures to reduce the risk of sourcing and delivering biomass originating from these areas.
3. No deliveries with un-known origins are accepted.
4. Material from high-risk areas are identified and avoided.
5. The absence of HCVs in harvesting areas where up-to-date information is not available is verified by independent and licences experts. Sourcing is avoided if expert reviews is not available or an presence of a HCV is confirmed within the harvesting site.
6. Suppliers' and sub-suppliers' knowledge of risk indicators and implementation of risk mitigation measures are assessed and mitigation measures are reviewed if necessary.

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:	
WKHs: Lumbar 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. Lumbar 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. Lumbar 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).

Lumbar is controlling all FMUS before purchasing them from databases 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, Lumbar 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:

1. Suppliers devote themselves not to delivering biomass originating from HCV areas and the countries of origin are identified.
2. Suppliers are aware of threats to HCV areas in forests and are trained in using mitigation measures to reduce the risk of sourcing and delivering biomass originating from these areas.
3. No deliveries with un-known origins are accepted.
4. Material from high-risk areas are identified and avoided.
5. The absence of HCVs in harvesting areas where up-to-date information is not available is verified by independent and licences experts. Sourcing is avoided if expert reviews is not available or an presence of a

HCV is confirmed within the harvesting site.

6. Suppliers' and sub-suppliers' knowledge of risk indicators and implementation of risk mitigation measures are assessed and mitigation measures are reviewed if necessary.

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:

Lumbar will verify all deliveries of primary feedstock which have been harvested in Estonia. Regarding material coming from FSC certified forests with FSC 100% claim or PEFC certified forests with 100% PEFC certified 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 and Natura 2000 habitats.

Lumbar will use a list of approved suppliers, delivery documents, publicly available official databases and databases provided by competent authorities, FSC Estonia and expert reports and also the results of their

own field visits to verify that the delivered primary feedstock has not been sourced from areas known to include any WKHs.

Lumbar is using software, provided by DESKIS, 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. Lumbar sources feedstock from pre-qualified contractual partners with verified competence and resources to also implement equal mitigation measures in upstream supply chains.

Lumbar 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:

1. Suppliers devote themselves not to delivering biomass originating from HCV areas and the countries of origin are identified.
2. Suppliers are aware of threats to HCV areas in forests and are trained in using mitigation measures to reduce the risk of sourcing and delivering biomass originating from these areas.
3. No deliveries with un-known origins are accepted.
4. Material from high-risk areas are identified and avoided.
5. The absence of HCVs in harvesting areas where up-to-date information is not available is verified by independent and licence experts. Sourcing is avoided if expert reviews is not available or a presence of a HCV is confirmed within the harvesting site.
6. Suppliers' and sub-suppliers' knowledge of risk indicators and implementation of risk mitigation measures are assessed and mitigation measures are reviewed if necessary.

Country: Estonia

Area/sub-scope:

Risk Assessment used:

- ☐ SBP-RRR-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim
- ☐ SBP-RRR-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 combined attributes of HCV and high carbon stock 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:

To mitigate the risk of sourcing primary feedstock from forest areas classified as having both high carbon stock and high conservation value (HCV), Lumbar applies a comprehensive risk management approach based on the findings of the Regional Risk Assessments (RRAs).

1. All suppliers undergo a supplier approval process, during which suitability to Lumbar supply base is assessed. Suppliers must sign a code of conduct covering requirements on feedstock sourcing and submit a declaration of feedstock origin covering sub-suppliers and countries of origin.
2. Guidance is provided to SBE suppliers regarding identified threats to the forests and areas of high conservation values and management measures to be implemented to mitigate these risks.
3. The origin of all feedstock deliveries (including supplier, feedstock type, delivered volume, certification status, and origin of feedstock) is verified before first delivery.
4. The origin of primary feedstock is validated against the WKH database, the potential WKH database, and the Natura 2000 forest habitats database. Deliveries with a risk of the material originating from a WKH or Natura 2000 forest habitat type are rejected under the scope of SBE.
5. In the case of an identified potential WKH threat, a licensed WKH expert may be used to verify the

absence of WKH within the planned harvesting site. Material is only accepted if the expert review confirms the absence of a WKH within the site.

6. In the case of a potential forest habitat type threat, an independent and licensed forest consul may be used to verify the absence of the forest habitat type within the planned harvesting sites in Natura 2000 areas. Material is only accepted if the expert review confirms the absence of the forest habitat types within the planned harvesting site not covered by an updated inventory conducted by or on behalf of the Environmental Board.

7. Annual sample-based supplier audits and forest visits are carried out to assess the performance of the suppliers and check the absence of identified risks in the forests. If risks are identified sourcing under the scope of SBE is only continued if corrective actions have been implemented and their effectiveness has been confirmed.

8. In case of primary feedstock the SBP-recognised certification scheme must effectively mitigate the risk of indicators 2.1.1, 2.1.2, 2.1.3 and thus effectively in case of the RRA for Estonia also indicator 3.2.3.

9. In case of processing residues the feedstock category must be verified AND feedstock sourced as feedstock is certified by an SBP-recognised certification scheme.

Monitoring and outcomes:

1. Suppliers devote themselves not to delivering biomass originating from HCV areas and the countries of origin are identified.
2. Suppliers are aware of threats to HCV areas in forests and are trained in using mitigation measures to reduce the risk of sourcing and delivering biomass originating from these areas.
3. No deliveries with un-known origins are accepted.
4. Material from high-risk areas are identified and avoided.
5. The absence of HCVs in harvesting areas where up-to-date information is not available is verified by independent and licensed experts. Sourcing is avoided if expert reviews are not available or a presence of a HCV is confirmed within the harvesting site.
6. Suppliers' and sub-suppliers' knowledge of risk indicators and implementation of risk mitigation measures are assessed and mitigation measures are reviewed if necessary.

Country: Latvia

Area/sub-scope:

Risk Assessment used:

- ☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim
- ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim
- ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim
- ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed
- ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim
- ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed
- ☒ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed

	☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.1.1 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.	
Description of the specific risk:	
From SBP risk assessment: " Risk conclusion and justification As the risk class for HCV category 1 is assessed as specified, the risk class for this Indicator is also assessed as specified." "Under the Nature Census, the mapping of the habitats of EU importance in Latvia was undertaken during 2017-2022. However, mapping the protected species was not the task of the Nature Census. Therefore, data on protected species was not collected comprehensively during Nature Census surveys. Consequently, as the consultation with the Nature Conservation Agency suggests, the data on protected species is fragmented, and not all locations of the protection of species are mapped and protected. While data on locations of the protected species are updated on a regular basis, operators must establish robust routines to evaluate the location of origin of energy wood to prevent supplies from HCV category 1." The risk is related to insufficient mapping of protected species.	
Mitigation measure:	
Before conducting any felling, buying cutting right of standing stock or before buying forest material company controls if there are any known environmental values via <i>Natural data management system "Ozols" (Nature Data Management System OZOLS Dabas aizsardzības pārvalde fe/)</i> to avoid fellings in high risk areas. Supplier is FSC certified and therefore is visiting each felling site before felling to make sure that there are no protected species or big bird nests in that site. For each such field visit protocol is filled. In case any of the abovementioned values is discovered, species expert will be contacted to get information if fellings are possible to be conducted in that site or not. If possible then conditions are asked to avoid damaging any of the values. For company field visits company is using contractors with Latvian forestry experience. All field visits will be protocolled. In case there is Woodland Key Habitat (WKH) or Natura 2000 Forest habitat in the felling site then the felling cant be conducted and such material can not be sourced in purpose of using it in SBP system. In case there are no abovementioned habitats or species or it is possible to conduct fellings without damaging the species or their habitats, then material can be sourced.	
Monitoring and outcomes:	

1. Suppliers devote themselves not to delivering biomass originating from HCV areas and the countries of origin are identified.
2. Suppliers are aware of threats to HCV areas in forests and are trained in using mitigation measures to reduce the risk of sourcing and delivering biomass originating from these areas.
3. No deliveries with un-known origins are accepted.
4. Material from high-risk areas are identified and avoided.
5. Material from harvesting sites where a HCV is present is only accepted if the HCV has been preserved and this is confirmed via a protocolled site visit.
6. Suppliers' and sub-suppliers' knowledge of risk indicators and implementation of risk mitigation measures are assessed and mitigation measures are reviewed if necessary.

Country: Latvia	
Area/sub-scope:	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☒ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.1.2 Threats to and impacts on the identified key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified and evaluated.	
Description of the specific risk:	
From SBP risk assessment: "Risk conclusion and justification Based on the above analysis the risk class for this Indicator is assessed as specified." "Intensive logging is linked to the disturbance and loss of forest habitats of several rare, threatened and endangered bird species particularly in areas important for bird breeding and nesting (Bird International's Important Bird Areas). Most of these areas are overlapping with existing nature protection territories, most of which are territories with less stringent nature protection requirements such as nature parks, protected landscape areas, and National Parks (except strict nature protection zoning), where active forest management, including harvesting in clearcuts, is allowed. Thus, the actual protection regime in these territories in practice does not differ much from commercial forests outside protected nature territories where	

rare, threatened and endangered species and habitats are protected only through microreserves. The reduction of nature protection and biological diversity needs in favour of commercial interests can be linked to the unfavourable status of protection of several rare, threatened and endangered forest bird species (black stork, lesser spotted eagle, for instance).

According there is a risk that the threats to and impacts on some key species and their habitats are not fully identified and evaluated particularly in areas with HCV 1 objects.”

Risk is related to protected bird species and -habitats.

Same risk mitigation process as mentioned under 2.1.1 is used to mitigate the risk related to 2.1.2.

Mitigation measure:

Before conducting any felling, buying cutting right of standing stock or before buying forest material company controls if there are any known environmental values via *Natural data management system “Ozols” (Nature Data Management System OZOLS | Dabas aizsardzības pārvalde fe/)* to avoid fellings in high risk areas.

Supplier is FSC certified and therefore is visiting each felling site before felling to make sure that there are no protected species or big bird nests in that site. Each such field visit will be protocolled. In case any of the abovementioned values is discovered, species expert will be contacted to get information if fellings are possible to be conducted in that site or not. If possible then conditions are asked to avoid damaging any of the values.

For company field visits company is using contractors with Latvian forestry experience.

All field visits will be protocolled.

In case there is Woodland Key Habitat (WKH) or Natura 2000 Forest habitat in the felling site then the felling cant be conducted and such material can not be sourced in purpose of using it in SBP system.

In case there are no abovementioned habitats or species or it is possible to conduct fellings without damaging the species or their habitats, then material can be sourced.

Monitoring and outcomes:

1. Suppliers devote themselves not to delivering biomass originating from HCV areas and the countries of origin are identified.
2. Suppliers are aware of threats to HCV areas in forests and are trained in using mitigation measures to reduce the risk of sourcing and delivering biomass originating from these areas.
3. No deliveries with un-known origins are accepted.
4. Material from high-risk areas are identified and avoided.
5. Material from harvesting sites where a HCV is present is only accepted if the HCV has been preserved and this is confirmed via a protocolled site visit.
6. Suppliers' and sub-suppliers' knwoledge of risk indicators and implementation of risk mitigation measures are assessed and mitigation measures are reviewed if necessary.

Country: Latvia	
Area/sub-scope:	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☒ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.1.3 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.	
Description of the specific risk:	
From SBP risk assessment: "Risk conclusion and justification Based on the above analysis the risk class for this Indicator is assessed specified." "The maintenance of forest biological diversity is affected by the economic activities in the countryside according to the outcomes of the report (5th National Report to the Convention on Biological Diversity). The report outlines the fact that the forest often is seen as the only source of income for inhabitants of the countryside and this contributes to the unsustainable use of forests. Other factors that impact forest biodiversity negatively are melioration, construction of forest roads, and lack of natural disturbance in particular forest habitats. The detailed assessment done concerning forests under various HCV Categories under indicators 2.1.1 and 2.1.2 suggests that the risks and threats to certain key species and their habitats (related to HCV category 1 in all forests) are not identified and evaluated. Without such identification and evaluation, there is a risk that those key species and habitats cannot be maintained or enhanced adequately." Risk is related to cutting of protected species and habitats and also cutting of HCV 3 - Natura 2000 forest habitats and Woodland Key Habitats.	
Mitigation measure:	
Before conducting any felling, buying cutting right of standing stock or before buying forest material company controls if there are any known environmental values via <i>Natural data management system "Ozols"</i> (<i>Nature Data Management System OZOLS Dabas aizsardzības pārvalde fe/</i>) to avoid fellings in high risk areas.	

Supplier is FSC certified therefore is visiting each felling site before felling to make sure that there are no protected species or big bird nests in that site. All such visits will be protocolled. In case any of the abovementioned values is discovered, species expert will be contacted to get information if fellings are possible to be conducted in that site or not. If possible then conditions are asked to avoid damaging any of the values. If discovered value needs strict protection, fellings can not be conducted and material can not be accepted.

For company field visits company is using contractors with Latvian forestry experience.

All field visits will be protocolled.

In case there is Woodland Key Habitat (WKH) or Natura 2000 Forest habitat in the felling site then the felling cant be conducted and such material can not be sourced in purpose of using it in SBP system. In case there are no abovementioned habitats or species or it is possible to conduct fellings without damaging the species or their habitats (based on expert opinion), then material can be sourced.

Monitoring and outcomes:

1. Suppliers devote themselves not to delivering biomass originating from HCV areas and the countries of origin are identified.
2. Suppliers are aware of threats to HCV areas in forests and are trained in using mitigation measures to reduce the risk of sourcing and delivering biomass originating from these areas.
3. No deliveries with un-known origins are accepted.
4. Material from high-risk areas are identified and avoided.
5. Material from harvesting sites where a HCV is present is only accepted if the HCV has been preserved and this is confirmed via a protocolled site visit.
6. Suppliers' and sub-suppliers' knwoledge of risk indicators and implementation of risk mitigation measures are assessed and mitigation measures are reviewed if necessary.

Country: Latvia

Area/sub-scope:

Risk Assessment used:

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

	☐ SBP-RRR-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:	
There is a risk that insufficiently mapped HCV areas remain and there are significant gaps in the information. The possibility that these areas overlap with areas with high carbon stocks such as mature secondary forests, cannot be ruled out. Moreover, harvesting can occur in important habitats and harvesting may pose a risk to threatened bird species through the destruction of nests as not all nesting areas are identified. Thus there is a risk of a non-conformity with this requirement which is given the risk classification of specified. See also indicators 2.1.1-2.1.3 for more details.	
Mitigation measure:	
To mitigate the risk of sourcing primary feedstock from forest areas classified as having both high carbon stock and high conservation value (HCV), Lumbar applies a comprehensive risk management approach based on the findings of the Regional Risk Assessments (RRAs). 1. All suppliers undergo a supplier approval process, during which suitability to Lumbar supply base is assessed. Suppliers must sign a code of conduct covering requirements on feedstock sourcing and submit a declaration of feedstock origin covering sub-suppliers and countries of origin. 2. Guidance is provided to SBE suppliers regarding identified threats to the forests and areas of high conservation values and management measures to be implemented to mitigate these risks. 3. The origin of all feedstock deliveries (including supplier, feedstock type, delivered volume, certification status, and origin of feedstock) is verified before first delivery. 4. The origin of primary feedstock is validated against the Ozols database to pre-screening deliveries for Natura 2000 forest habitats and the occurrence of protected species within harvesting sites. Deliveries with a risk of the material originating from Natura 2000 a forest habitat type or site of protected species are rejected under the scope of SBE. 5. In the case of an identified HCV threat within a harvesting site a field visit may be used to verify the HCV is intact. Material is only accepted if the field visit confirms the WKH has been preserved. 6. Annual sample-based supplier audits and forest visits are carried out to assess the performance of the suppliers and check the absence of identified risks in the forests. If risks are identified sourcing under the scope of SBE is only continued if corrective actions have been implemented and their effectiveness has been confirmed. 7. In case of primary feedstock the SBP-recognised certification scheme must effectively mitigate the risk of indicators 2.1.1, 2.1.2, 2.1.3 and thus effectively in case of the RRA for Latvia also indicator 3.2.3. 8. In case of processing residues the feedstock category must be verified AND feedstock sourced as	

feedstock is certified by an SBP-recognised certification scheme.

Monitoring and outcomes:

1. Suppliers devote themselves not to delivering biomass originating from HCV areas and the countries of origin are identified.
2. Suppliers are aware of threats to HCV areas in forests and are trained in using mitigation measures to reduce the risk of sourcing and delivering biomass originating from these areas.
3. No deliveries with un-known origins are accepted.
4. Material from high-risk areas are identified and avoided.
5. Material from harvesting sites where a HCV is present is only accepted if the HCV has been preserved and this is confirmed via a protocolled site visit.
6. Suppliers' and sub-suppliers' knowledge of risk indicators and implementation of risk mitigation measures are assessed and mitigation measures are reviewed if necessary.

4 Stakeholder engagement

4.1 General description

Biomass Producer's stakeholder engagement start date: 20 Dec 2024

Biomass Producer's stakeholder engagement end date: 22 Feb 2025

Total number of stakeholders contacted: 41

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 third round of consultation 20.12.2024 - 20.02.2025 information 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)

Data update for the period

Name	Anni Mõts
Title	Management representative
Date of report approval	19 Jan 2026

Name	Janeke Rivimets
Title	Report author
Date of report approval	19 Jan 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 are used as for forest material. Lumber SBP compliant primary feedstock is sourced from certified and uncertified forests. A small portion of feedstock could be sourced from cleaning process of infrastructure objects and from cleaning process of agricultural land which fell under the category Trees outside forest (TOF) - Urban and landscape feedstock (2A) 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. In Estonia no legislation is regulating such cleaning process (except protected habitats where Nature conservation act and conditions set by Board of Environment must be followed). In Latvia there are some regulations, but there are mostly no specific legal acts regulating this type of land management, except in cases related to protected habitats, where the conditions set by the Nature Conservation Agency and the State Environmental Service must be observed. 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 it's done in the forest. Also, same origin related data is collected as it is done with forest biomass.
Risk Rating	Low Risk

Latvia Northern part of 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	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Latvia Northern part of Latvia	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
1.1.2	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

Latvia Northern part of 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	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Latvia Northern part of 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	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

Latvia Northern part of 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	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Latvia Northern part of 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	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
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
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

Latvia Northern part of 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	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

Latvia Northern part of 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	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
2.1.3	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

Latvia Northern part of Latvia	Indicator
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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
2.2.1	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

Latvia Northern part of Latvia	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
2.2.2	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

Latvia Northern part of Latvia	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

Latvia Northern part of 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	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

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

Latvia Northern part of Latvia	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
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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

Latvia Northern part of 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	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Latvia Northern part of 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	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
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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

Latvia Northern part of Latvia	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

Latvia Northern part of 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	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

Latvia Northern part of Latvia	Indicator
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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

Latvia Northern part of Latvia	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

Latvia Northern part of Latvia	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
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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

Latvia Northern part of 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	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Latvia Northern part of 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	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

Latvia Northern part of 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	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Latvia Northern part of 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	The risk is mitigated by applying the same risk management measures as for forest material, 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
3.2.3	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	The risk is mitigated by applying the same risk management measures as for forest material, 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

Latvia Northern part of 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	N/A
Risk Rating justification	N/A
Risk Rating	Low 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

Latvia Northern part of Latvia	Indicator
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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
4.1.1	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

Latvia Northern part of Latvia	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

Latvia Northern part of Latvia	Indicator
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4.1.3	Child labour shall not be used.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Latvia Northern part of Latvia	Indicator
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
4.1.4	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

Latvia Northern part of 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	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

Latvia Northern part of Latvia	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

Latvia Northern part of 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	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

Latvia Northern part of 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	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

Latvia Northern part of Latvia	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

Latvia Northern part of 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	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Latvia Northern part of Latvia	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
4.2.1	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

Latvia Northern part of Latvia	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

Latvia Northern part of 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	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

Latvia Northern part of 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	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

Latvia Northern part of 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	N/A
Risk Rating justification	N/A

Risk Rating	Low Risk
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Latvia Northern part of 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	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

Latvia Northern part of Latvia	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

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	N/A
Level B management system at the level of the forest sourcing area	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”. Peatlands - 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.
(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	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. Since there is no officially agreed definition in Estonia for these two forest types, company is using definition provided by SBP in RA document for old growth forest (“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.” and own definition for primary forest. Primary forest – company does not source material from forests that are growing on historical forest land where it is known that there has been no human activities and it meets definition mentioned above. Old growth forests (OGF) - Company does not source material from stands that have age that is double of the cutting age set by legislation. For tree species that don't have cutting age, the age limit is set for 100 years old or older. 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.	

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:

(a) **primary forest** and other wooded land and **old growth forest**, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located. If there is no definition of **old growth forest** at the national level, then the following definition shall apply: A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Specific Risk description: Risk is related of sourcing material from primary forest and old growth forests. Companies Activities: Company does not source material from forests that could be defined as primary or old growth forest. In Estonia, the OGF and primary forests are expected to be found within Woodland Key habitats (WKHs), Natura 2000 sites and other protected forests, so same risk mitigation activities 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”.

(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. <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>(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).</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	The same risk mitigation measures referenced for indicators 2.1.1, 2.1.2, and 2.1.3 of the “SBP Revised Regional Risk Assessment for Estonia v2.0” are applied to prevent sourcing from highly biodiverse forests.
(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:</i> <i>(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</i>	

does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ 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	To stop further drainage of natural peatlands and to continue peat extraction preferably in already drained and degraded areas until the resource is exhausted and the area is restored, the Minister of the Environment established the regulation on 27 December 2016 titled “List of peatlands damaged and abandoned by mining and suitable for extraction.” Residual bogs that, according to surveys, no longer have extractable peat reserves must be restored. Residual bogs are revalued by transforming them into wetlands, creating conditions for peat formation, agriculture, forestry, or other uses. Under SBP’s RED-II risk assessment for Estonia the indicator (iii) „That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands and peatlands, are protected unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes“ as well as the RRA 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) peatlands, (c) wetlands and (d) highly biodiverse grassland” were low risk. In addition Lumbar monitors that the delivered forest biomass does not originate from Natura 2000 areas where forest habitats are present including: Alluvial forests (91E0); Fennoscandian deciduous swamp woods (*9080) an Bog woodlands *91D0 and monitors and avoids material which has been harvested based on expansion of peat extraction areas.
(vii) that installations producing biomass fuels from forest biomass, issue a statement of assurance, underpinned by company-level internal processes, for the purpose of the audits conducted pursuant to Article 30(3), that the forest biomass is not sourced from the lands referred to in point (vi).	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	<i>Not applicable, requirement only applies to Level A</i>

LULUCF criteria 29(7)	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-endorsed REDII Level A risk assessment for Article 29(7) LULUCF
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	Northern part of 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	Level A for Latvia by Ministry of Agriculture of the Republic of Latvia (RED III)
Level B management system at the level of the forest sourcing area	N/A
(ii) Forest regeneration of harvested areas	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	Level A for Latvia by Ministry of Agriculture of the Republic of Latvia (RED III)
Level B management system at the level of the forest sourcing area	N/A
(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grasslands, heathland and peatlands, are protected with the aim of preserving biodiversity and preventing habitat destruction, unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	Level A for Latvia by Ministry of Agriculture of the Republic of Latvia (RED III)
Level B management system at the level of the forest sourcing area	N/A
(iv) that harvesting is carried out considering the maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth forests as defined in the country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located, and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with requirements to use logging systems that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and habitats	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	Level A for Latvia by Ministry of Agriculture of the Republic of Latvia (RED III)

Level B management system at the level of the forest sourcing area	N/A
(v) That harvesting maintains or improves the long-term production capacity of the forest.	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	Level A for Latvia by Ministry of Agriculture of the Republic of Latvia (RED III)
Level B management system at the level of the forest sourcing area	N/A
(vi)¹ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(a) primary forest and other wooded land and old growth forest, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located. If there is no definition of old growth forest at the national level, then the following definition shall apply: A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.</i>	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	Level A for Latvia by Ministry of Agriculture of the Republic of Latvia (RED III)
Level B management system at the level of the forest sourcing area	N/A
(vi)² That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(b) highly biodiverse forest and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.</i>	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	Level A for Latvia by Ministry of Agriculture of the Republic of Latvia (RED III)
Level B management system at the level of the forest sourcing area	N/A
(vi) ³ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses	

referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.

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

(d) **highly biodiverse grassland** spanning more than one hectare that is: (i) natural, namely grassland that would remain grassland in the absence of human intervention and that maintains the natural species composition and ecological characteristics and processes; or (ii) non-natural, namely grassland that would cease to be grassland in the absence of human intervention and that is species-rich and not degraded and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the harvesting of the raw material is necessary to preserve its status as highly biodiverse grassland.

Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	Level A for Latvia by Ministry of Agriculture of the Republic of Latvia (RED III)
Level B management system at the level of the forest sourcing area	N/A

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

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

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

Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	Level A for Latvia by Ministry of Agriculture of the Republic of Latvia (RED III)
Level B management system at the level of the forest sourcing area	N/A

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

Article 29 (4): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:

(a) **wetlands**, namely land that is covered with or saturated by water permanently or for a significant part of the year (NOTE: Evidence of verification of wetlands should reflect seasonal changes within a year).

Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
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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-endorsed REDII Level A risk assessment for Article 29(7) LULUCF
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 - -

Not Applicable - only urban and landscape feedstock is used

Country: Latvia - Northern part of 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).