



Supply Base Report:

ZUB Kerkasiai Main (Initial) Audit

Sustainable Biomass Program
sbp-cert.org



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

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

Document history

Version 1.0	Published 26 March 2015
Version 2.0	Published 10 August 2023
Version 2.1	Published 15 April 2024
Version 2.2	Published 21 May 2025

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1 Overview

Producer name:	ŽŪB Kerkasiai
Producer address:	Kinčalių K., LT-86249 Nemakščių sen., Lithuania
SBP Certificate Code:	
Geographic position:	55.489808, 22.865854
Primary contact:	Tomas Petkevičius, +370 616 844 18, tomas@kerkasiai.lt
Company website:	
Date report finalised:	
SBR reporting period from:	03 Jun 2025
SBR reporting period to:	03 Jul 2025
Name of the Certification Body:	SCS Global Services
Certification Body Approval date:	26 Aug 2025
SBP Standard(s) used:	SBP Standard 1: Feedstock Compliance v2.0, SBP Standard 2: Feedstock Verification v2.0, SBP Standard 4: Chain of Custody v2.0, SBP Standard 5: Collection and Communication of Data v2.0, Instruction Document 1A: SBP Requirements for Primary Feedstock from Trees Outside Forests (TOF) v1.0, Instruction Document 5E: Collection and Communication of Energy and Carbon Data v2.0, Instruction Document EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413 v2.0
Feedstock origin (countries)	Lithuania (-)
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

Established in 1992, ŽŪB Kerkasiai is a Lithuanian biomass producer specializing in wood chip production and land restoration services. With over 30 years of experience, the company has built a strong reputation for quality biomass supply and responsible land use practices. Our activities include the processing of logging residues and overgrown vegetation into high-quality wood chips, which are transported either directly from felling sites or from our intermediate storage facilities. In recent years, we have expanded our operational capacity and established a reliable supplier network throughout Lithuania, including both certified and non-certified sources. With a growing team of 29 employees and an ongoing commitment to sustainability, ŽŪB Kerkasiai aims to strengthen its role as a trusted and environmentally conscious biomass supplier in the Baltic region.

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

Number of employees: 29

Annual maximum production capacity (metric tonnes): 150000

Number of direct feedstock suppliers: 100

Approximate number of feedstock sub-suppliers: 100

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

Branches and logging residues are processed into wood chips either directly at the harvesting site or at the company's storage yards. The produced chips are transported by chip trucks directly to the end customer or temporarily stored at the company's premises. The company sources wood from certified suppliers operating in Lithuania, including state forest enterprises and private forest owners. Non-certified wood is procured from private forest owners, as well as from agricultural land users who are clearing overgrown fields, roadsides, and drainage ditch edges.

2.2 Detailed description of the Supply Base

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

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

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

Country	Lithuania
Area/Region	-
Exclusions	
Feedstock types	Primary feedstock, Processing residues
Feedstock Product Groups	Forest feedstock (1A), Trees outside forest (TOF) - Urban and landscape feedstock (2A), Trees outside forest (TOF) - Agricultural land feedstock (3A), Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock , SBP Controlled feedstock, Non-eligible feedstock

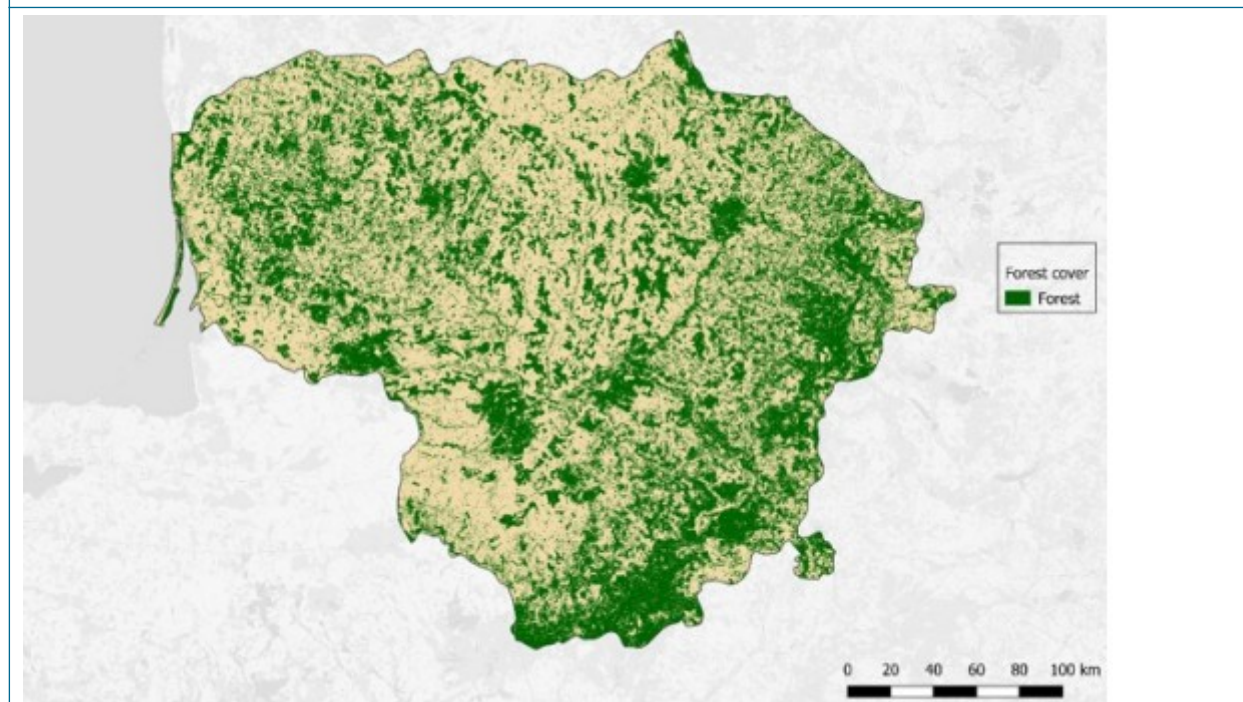
Is the forest managed to supply energy and non-energy markets?	Yes - Minority
For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?	Yes - Majority
Risk assessment(s)	Yes – Regional Risk Assessment (RRA) used, Yes – Biomass Producer's own risk assessment used (SBE) , N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme

Provide a concise summary of why a SBE was determined to be required or not required here:

A Supply Base Evaluation (SBE) was required due to the inclusion of non-certified feedstock sourced from private forest owners and overgrown agricultural or marginal lands. Since this material is not covered by FSC or PEFC certification schemes, it must be assessed to ensure compliance with SBP sustainability criteria. The SBE process allows the company to identify and manage potential sustainability risks associated with this type of feedstock.

Feedstock types included in SBE:	Primary feedstock, Processing residues
Includes EU RED SBE:	Yes
Includes EU RED TOF:	Yes
Size of Supply Base area (million ha):	2.1800

Map(s) of the Supply Base area:



2.3 Feedstock information

a. Total volume of Feedstock: 1-200,000 tonnes

b. Volume of primary feedstock: 1-200,000 tonnes

c. List of all the species in primary feedstock, including scientific name:

d. Was the feedstock used in the biomass removed from a forest as part of a pest/disease control measure or a salvage operation? No

Explanation: The feedstock is primarily sourced from regular harvesting activities, land maintenance, or clearing of overgrown vegetation. No significant volumes are sourced as part of pest or salvage operations.

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

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

g. Proportion of feedstock composed of or derived from saw logs by weight (%): 0.00

h. Indicate how you determine the proportion of saw log: Specification used by the sawmill closest to where the wood was grown.

i. Roundwood from fellings from forests with > 40 yr rotation times - Average % volume of fellings delivered to BP (%): 50.00

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: 100000 tonnes

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

Physical form of the feedstock: Sawdust, Offcuts

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

o. Volume of post-consumer feedstock: 0

Physical form of the feedstock: Sawdust, Offcuts

p. Estimated amount of EU RED-compliant sustainable feedstock that could be collected annually by the BP: 150000 tonnes

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

Explanation: Based on available biomass from forest residues and overgrown land across Lithuania, in combination with collection and processing 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

Supply Base Evaluation (SBE) is implemented for feedstock sourced within Lithuania, including primary feedstock such as logging residues, firewood-quality roundwood, and woody biomass collected during the clearing of overgrown agricultural fields, roadside strips, and ditches. A portion of this material originates from Trees Outside Forests (TOF). The SBP-endorsed Regional Risk Assessment for Lithuania is used for forest-sourced material, while risks associated with TOF are assessed based on the company's internal verification procedures aligned with SBP requirements.

3.2 Conflicts with applicable national and sub-national legislation

There are no identified conflicts between applicable national or sub-national legislation and the SBP requirements. All biomass sourcing activities conducted by ŽŪB Kerkasiai are in accordance with Lithuanian legal requirements, which are consistent with SBP sustainability and legality principles.

3.3 Risk Management Measures

Guidance: Please provide more details about specified risk indicators in each supply country and describe mitigation measures taken to address all specified risks associated with indicators.

Country: Lithuania	
Area/sub-scope:	
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 ☐ 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:
Some protected habitats (e.g., Natura 2000 sites, Woodland Key Habitats – WKH) on private forest land may not be legally protected. Biomass might originate from these areas if proper checks are not in place.
Mitigation measure:
Before purchasing, ŽŪB Kerkasiai checks every felling ticket or land parcel via the national geoportal (www.geoportal.lt) against Natura 2000, WKH, and wetland maps. Biomass from such areas is not accepted.
Monitoring and outcomes:
Internal audit once per year includes sample checks of all non-certified sourcing locations. No material from protected areas has been found to enter the supply chain. Audit results will be recorded.

Country: Lithuania
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 ☐ Biomass Producer's own risk assessment
Indicator with specified risk:
2.2.2 Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.
Description of the specific risk:
Private forest areas and non-forest land (TOF) may be cleared without proper attention to ecological values or protected species..
Mitigation measure:
Feedstock is only accepted from areas that have legal felling permits or land-clearing approval. All suppliers are required to confirm that no conversion of protected or sensitive areas occurs. Maps and site photos are

checked during field visits.
Monitoring and outcomes:
Random field verification of cleared areas is performed by the forestry manager. If risk indicators are observed, material is rejected and the supplier is flagged in the internal registry.

Country: Lithuania
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 ☐ Biomass Producer's own risk assessment
Indicator with specified risk:
3.2.2 Primary feedstock shall not be sourced from forest areas where site productivity is low and, according to local definitions or norms, the areas are classified as low-productive or difficult to regenerate.
Description of the specific risk:
In private forests, low-productivity stands (e.g., wet forests, swamps) may still be harvested even though they are excluded from state planning.
Mitigation measure:
Felling tickets and geoportal maps are used to evaluate productivity class (site index). Feedstock from coniferous forest parcels rated 5a and lower or deciduous parcels rated 5 and lower is not accepted.
Monitoring and outcomes:
Sample verification of productivity classes is conducted once per year using the VMT-GIS system. No non-compliant feedstock has been identified to date. Records maintained. Internal audit results will be recorded.

Country: Lithuania

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 ☐ 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:	
Some wetlands, peatlands, and old-growth forests are not legally protected and may be cleared for biomass.	
Mitigation measure:	
ŽŪB Kerkasiai uses geoportal layers and forest maps to ensure feedstock is not sourced from these high-risk areas. Material from peatlands, wetlands, or suspected old-growth forests is strictly excluded.	
Monitoring and outcomes:	
Annual review of selected parcels through the national geoportal. No feedstock from high carbon stock areas has entered the system. Audit results will be recorded.	

Country: Lithuania	
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 ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
4.1.10 Safeguards shall be put in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures.	
Description of the specific risk:	
In private operations, especially when using contractors, there may be insufficient application of occupational health and safety measures.	
Mitigation measure:	
ŽŪB Kerkasiai does not outsource logging activities. All harvesting is managed in-house. Nevertheless, suppliers of raw material must confirm that their contractors comply with national health and safety regulations. Field safety audits are conducted where necessary.	
Monitoring and outcomes:	
The company maintains a register of suppliers. If any indication of safety violation is identified, corrective action is required or cooperation is suspended. Internal audit includes health & safety review annually.	

4 Stakeholder engagement

4.1 General description

Biomass Producer's stakeholder engagement start date: 03 Jun 2025

Biomass Producer's stakeholder engagement end date: 03 Jul 2025

Total number of stakeholders contacted: 17

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

A total of 17 stakeholders were contacted, with contact information sourced from official websites. There were several government, state institutions, also industry organisations, NGO's and educational institutions. No responses were received to date.

List of Contacted Stakeholders:

1. BM Certification
2. State Forest Service under the Ministry of Environment
3. Environmental Protection Department
4. State Service for Protected Areas
5. State Forest Enterprise
6. Private Forest Owners' Association
7. Forest and Land Owners Association of Lithuania
8. Lithuanian Biomass Energy Association
9. Lithuanian Confederation of Renewable Resources
10. Forestry Contractors' Association
11. UAB Šilalės mediena
12. UAB Stora Enso Lietuva
13. Lithuanian Centre of Agricultural and Forestry Sciences
14. Vytautas Magnus University (Faculty of Forestry and Ecology)
15. Lithuanian Fund for Nature
16. Environmental Coalition
17. Lithuanian Federation of Trade Unions of Forest and Forest Industry Workers

4.2 Response to stakeholder comments

5 Report updates and approval

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

Summary of changes: N/A

Annex 1: Detailed findings for Supply Base Evaluation indicators

Lithuania	Indicator
-	
1.1.1	Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.
Supply Base Verifiers	NA
Risk Rating justification	NA
Risk Rating	Low Risk

Lithuania	Indicator
-	
1.1.2	Legal ownership of land and resource use rights shall be respected.
Supply Base Verifiers	NA
Risk Rating justification	NA
Risk Rating	Low Risk

Lithuania	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	NA
Risk Rating justification	NA
Risk Rating	Low Risk

Lithuania	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	NA
Risk Rating justification	NA
Risk Rating	Low Risk

Lithuania	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	NA
Risk Rating justification	NA
Risk Rating	Low Risk

Lithuania	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	NA
Risk Rating justification	NA
Risk Rating	Low Risk

Lithuania	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	NA
Risk Rating justification	NA
Risk Rating	Low Risk

Lithuania	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	· Felling permit data for private forest operations · Geoportal.lt spatial layers (Woodland Key Habitats [WKH], Natura 2000 zones, nature reserves) · Supplier declarations and field inspection records · Confirmation of forest management regime (certified or not) · Internal due diligence procedures and location-specific verification SBP-endorsed Regional Risk Assessment for Lithuania (2024)
Risk Rating justification	According to the SBP-endorsed Regional Risk Assessment (RRA) for Lithuania , there is a specified risk of biomass being sourced from areas of high conservation value (HCV), such as: · Natura 2000 sites that are not always legally excluded from harvesting on private lands; · Woodland Key Habitats (WKHs), which are identified ecologically important sites but are not protected under law unless the landowner agrees; · Other ecologically sensitive areas where landowners or operators may not be fully aware of the presence of HCVs.

	This risk primarily applies to feedstock sourced from non-certified private forest land and TOF areas, where no third-party sustainability certification (FSC/PEFC) is in place, and where legal protection of HCVs is either partial or unenforced. The RRA concludes that there is insufficient legal and institutional control to guarantee that all harvesting activities systematically avoid damage to biodiversity and HCVs in these areas. For ŽŪB Kerkasiai, part of the feedstock is sourced from: · Private forest owners, and · Overgrown or unmanaged TOF plots, which increases the potential exposure to this risk. Therefore, this indicator must be addressed through robust risk mitigation measures to ensure that no biomass is sourced from HCV areas.
Risk Rating	Specified Risk

Lithuania	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	NA
Risk Rating justification	NA
Risk Rating	Low Risk

Lithuania	Indicator
-	
2.2.2	Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.
Supply Base Verifiers	· Feedstock source type (forest vs. TOF – Trees Outside Forests) · Felling permit and land-use documentation · Geoportal.lt land classification and satellite layers · Supplier declarations and contract clauses · Visual inspection records for cleared land and TOF areas · Internal due diligence procedures and risk evaluation procedures SBP-endorsed Regional Risk Assessment (RRA) for Lithuania (2024)
Risk Rating justification	The SBP Regional Risk Assessment for Lithuania (2024) classifies this indicator as specified risk due to the following concerns: 1. Clearing of overgrown agricultural land (TOF): Biomass feedstock sourced from clearing abandoned farmland, roadsides, or marginal lands may result in the disturbance or destruction of ecosystems that have spontaneously rewilded over time. These habitats may contain ecological functions (e.g., bird nesting sites, pollinator corridors) even if they are not legally protected or mapped as forest land. 2. Lack of comprehensive ecosystem impact regulation: While harvesting in forest areas is regulated by national forestry legislation,

	biomass removal from TOF or non-forested land is less strictly governed, and environmental impacts (e.g. soil erosion, removal of shrublands) may go unmonitored, especially if biomass is not certified. 3. Private operations with limited oversight: Non-certified suppliers and private landowners may conduct vegetation clearance or biomass collection without systematic assessment of ecosystem health or biodiversity effects. This is particularly relevant to ŽŪB Kerkasiai, which source a portion of their biomass from field edges, ditches, and overgrown areas outside of the formal forest sector. As a result, the risk of negative impact on ecosystem vitality and services exists, particularly in non-certified TOF feedstock and unregulated land clearance.
Risk Rating	Specified Risk

Lithuania	Indicator
-	
2.2.3	Soil quality in the Supply Base shall be maintained or enhanced
Supply Base Verifiers	NA
Risk Rating justification	NA
Risk Rating	Low Risk

Lithuania	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	NA
Risk Rating justification	NA
Risk Rating	Low Risk

Lithuania	Indicator
-	
2.2.5	Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.
Supply Base Verifiers	NA
Risk Rating justification	NA
Risk Rating	Low Risk

Lithuania	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	NA
Risk Rating justification	NA
Risk Rating	Low Risk

Lithuania	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	NA
Risk Rating justification	NA
Risk Rating	Low Risk

Lithuania	Indicator
-	
2.2.8	Waste shall be disposed of in an environmentally appropriate manner.
Supply Base Verifiers	NA
Risk Rating justification	NA
Risk Rating	Low Risk

Lithuania	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	NA
Risk Rating justification	NA
Risk Rating	Low Risk

Lithuania	Indicator
-	
2.2.10	Harvested areas shall be regenerated
Supply Base Verifiers	NA
Risk Rating justification	NA
Risk Rating	Low Risk

Lithuania	Indicator
-	
2.2.11	The impacts of natural processes such as fires, pests and diseases shall be managed.
Supply Base Verifiers	NA
Risk Rating justification	NA
Risk Rating	Low Risk

Lithuania	Indicator
-	
2.2.12	Genetically modified trees shall not be used.
Supply Base Verifiers	NA
Risk Rating justification	NA
Risk Rating	Low Risk

Lithuania	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	NA
Risk Rating justification	NA
Risk Rating	Low Risk

Lithuania	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	NA
Risk Rating justification	NA
Risk Rating	Low Risk

Lithuania	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	- Forest cadastre and productivity class data from geoportal.lt - Site productivity index (bonitetas) per VMT classification - Felling permit documents indicating forest type and productivity class - Supplier declarations and land use status confirmation - Visual inspection reports and site photos (where applicable) Internal due diligence procedures, checklist (e.g., ban on sourcing from 5th productivity class or swampland)
Risk Rating justification	According to the SBP-endorsed Regional Risk Assessment for Lithuania (2024), this indicator is classified as specified risk due to the possibility that biomass may be sourced from forest areas or TOF zones with: Low site productivity (bonitetas 5 or 5a): These forests are ecologically fragile, slow-growing, and difficult to regenerate. Wetlands, peatlands, or flood-prone forest areas: These sites are environmentally sensitive and require careful handling or exclusion from biomass sourcing. Privately owned forests: Harvesting may occur on marginal land where regeneration is technically possible but economically unfeasible, and not legally restricted. In practice, non-certified operators may harvest from such sites due to economic motivations or lack of awareness. Since ŽŪB Kerkasiai sources biomass from various locations, including private forest lands and TOF, the company must implement a due diligence system that excludes low-productive plots from its supply base.
Risk Rating	Specified Risk

Lithuania	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	Geoportal.lt GIS layers showing: - Natura 2000 sites - Woodland Key Habitats (WKH) - Peatlands and wetlands Forest cadastre data and forest management classification

	• Land cover data from CORINE and/or Copernicus (e.g. Sentinel imagery) • Supplier declarations confirming land-use type and protection status • Visual inspection records (where applicable) • Due diligence documentation confirming exclusion of high-carbon or HCV areas
Risk Rating justification	According to the SBP Regional Risk Assessment for Lithuania (2024), there is a specified risk that biomass may be sourced from areas that combine: • High carbon stocks – such as peatlands, wetlands, and old-growth forests; and • High conservation value (HCV) attributes – e.g., protected species habitats, WKHs, Natura 2000 areas. In Lithuania, not all such areas are fully protected by law, especially on private land. Some peatland forest areas and unmanaged woodland key habitats may still be harvested under national regulations or in areas with limited enforcement. Because ŽŪB Kerkasiai sources some biomass from non-certified private lands and TOF (Trees Outside Forests), there is an elevated risk that feedstock could originate from areas with high carbon stocks and HCV attributes if robust mitigation measures are not applied. This indicator therefore requires active verification and strict sourcing controls to ensure that such areas are identified and excluded from the supply base.
Risk Rating	Specified Risk

Lithuania	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	NA
Risk Rating justification	NA
Risk Rating	Low Risk

Lithuania	Indicator
-	
4.1.1	Freedom of association and the right to collective bargaining shall be respected in the workplace.
Supply Base Verifiers	NA
Risk Rating justification	NA
Risk Rating	Low Risk

Lithuania	Indicator
-	
4.1.2	Forced or compulsory labour shall not be used.
Supply Base Verifiers	NA
Risk Rating justification	NA
Risk Rating	Low Risk

Lithuania	Indicator
-	
4.1.3	Child labour shall not be used.
Supply Base Verifiers	NA
Risk Rating justification	NA
Risk Rating	Low Risk

Lithuania	Indicator
-	
4.1.4	Workers shall not be discriminated in hiring, remuneration, access to training, promotion, termination or retirement.
Supply Base Verifiers	NA
Risk Rating justification	NA
Risk Rating	Low Risk

Lithuania	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	NA
Risk Rating justification	NA
Risk Rating	Low Risk

Lithuania	Indicator
-	
4.1.6	Working hours shall comply with legal requirements.
Supply Base Verifiers	NA
Risk Rating justification	NA
Risk Rating	Low Risk

Lithuania	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	NA
Risk Rating justification	NA
Risk Rating	Low Risk

Lithuania	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	NA
Risk Rating justification	NA
Risk Rating	Low Risk

Lithuania	Indicator
-	
4.1.9	Mechanisms shall be in place for resolving grievances and disputes in the workplace.
Supply Base Verifiers	NA
Risk Rating justification	NA
Risk Rating	Low Risk

Lithuania	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	- Supplier declarations on compliance with Lithuanian Labour Code and occupational safety requirements - On-site inspections or internal audits (if conducted by BP) - Risk assessment of subcontractor use and documentation - Cross-checks of whether harvesting, transport, and handling activities are internal or subcontracted - Documentation of safety training or accident reporting (if available) Inclusion of OHS clauses in biomass supply contracts
Risk Rating justification	According to the SBP-endorsed Regional Risk Assessment (RRA) for Lithuania, this indicator is classified as specified risk, particularly for biomass operations on non-certified private lands and among small- or medium-sized suppliers, due to the following: Health and safety laws exist, but enforcement at the operational level

	is inconsistent, especially among independent contractors, small forest owners, and TOF operators who may not follow structured OHS procedures. - While certified suppliers (e.g., FSC-certified) typically meet strong health and safety standards, non-certified operations often lack documented policies, fail to provide proper PPE, and do not conduct structured risk assessments or worker training. - There is a documented gap between regulation and field-level implementation, especially for temporary, seasonal, or informal workers engaged in land clearing, biomass loading, or transportation. In the case of ŽŪB Kerkasiai, although the company manages most activities in-house, it still procures feedstock from a broad network of private suppliers. Without verified OHS policies and controls for each supplier, the risk of inadequate protection for workers remains and must be addressed through due diligence and supplier screening
Risk Rating	Specified Risk

Lithuania	Indicator
-	
4.2.1	Negative social and community impacts shall be identified and avoided.
Supply Base Verifiers	NA
Risk Rating justification	NA
Risk Rating	Low Risk

Lithuania	Indicator
-	
4.2.2	Feedstock sourcing shall positively contribute to the local economy, including employment.
Supply Base Verifiers	NA
Risk Rating justification	NA
Risk Rating	Low Risk

Lithuania	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	NA
Risk Rating justification	NA
Risk Rating	Low Risk

Lithuania	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	NA
Risk Rating justification	NA
Risk Rating	Low Risk

Lithuania	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	NA
Risk Rating justification	NA
Risk Rating	Low Risk

Lithuania	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	NA
Risk Rating justification	NA
Risk Rating	Low Risk

Lithuania	Indicator
-	
4.2.7	Designated cultural heritage sites shall be preserved.
Supply Base Verifiers	NA
Risk Rating justification	NA
Risk Rating	Low Risk

Annex 2: EU RED Supply Base Evaluation

Countries where EU RED Supply Base Evaluation is used	
Country	Lithuania
Area	-
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	N/A
Level B management system at the level of the forest sourcing area	All raw material is sourced under valid forest felling permits issued by the State Forest Service. Cadastral numbers are checked against Geoportal.lt. Supplier contracts include legal compliance clauses. Copies of permits and transport documents are retained and subject to internal review.
(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	N/A
Level B management system at the level of the forest sourcing area	Forest plots are verified to ensure that regeneration (natural or planted) is required and enforced by national legislation. Suppliers are requested to provide evidence of compliance. Site inspections are conducted when needed.
(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	Sourcing areas are screened against GIS layers for Natura 2000, protected biotopes, and peatlands using Geoportal.lt. Harvesting in such areas is excluded unless proof is provided that nature protection objectives are not affected. Visual checks and declarations are required from suppliers.
(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	Supplier declarations include commitments to maintain biodiversity and soil integrity. Harvesting techniques are checked to avoid soil disturbance. Use of light machinery or manual collection is preferred for sensitive areas.
(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	N/A
Level B management system at the level of the forest sourcing area	Kerkasiai ensures that no biomass is sourced from forest plots classified as low productivity (bonitetetas class 5 or lower). Forest cadastre data and harvesting plans are used to confirm compliance. Regeneration obligations are also verified where applicable.
(vi) 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) first subparagraph with the exception of point (c), Article 29(4) with the exception of point (b) and (c) and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs	
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	ŽŪB Kerkasiai implements a Level B management system that ensures all sourced forest biomass is not harvested from lands with the statuses referred to in Article 29(3), Article 29(4) point (c), and Article 29(5) of the RED II Directive. The company performs detailed supplier and sourcing site verification, including: Verification of cadastral plots and geographical locations through GIS (geoportal.lt) to confirm that sourcing areas do not overlap with protected areas such as Natura 2000 sites, high carbon stock areas, wetlands, peatlands, and primary forests. Collection and control of felling permits and transportation documents to ensure legal sourcing. Supplier declarations confirming that the biomass is not harvested from restricted or protected land categories. Annual internal audits of suppliers and sourcing documents to ensure ongoing compliance. Immediate exclusion of any biomass where sourcing risks cannot be sufficiently mitigated or verified. All control measures and verification processes are fully documented and regularly reviewed to maintain compliance with RED II and SBP requirements.
(vii) that installations producing biomass fuels from forest biomass, issue a statement of assurance, underpinned by company-level internal processes, for the purpose of the audits conducted pursuant to Article	

30(3), that the forest biomass is not sourced from the lands referred to in point (vi).	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	Level A for Lithuania by Litbioma - Lithuanian Biomass Energy Association and SURE scheme
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	N/A
Level B management system at the level of the forest sourcing area	The company has implemented a documented sustainability risk assessment and control system, including verification of compliance with LULUCF requirements (e.g. no conversion of high carbon stock areas such as wetlands or continuously forested land after 2008), supplier declarations, and satellite or cadastral data screening. Internal audits and supplier monitoring ensure sourcing only from areas compliant with Article 29(7) of RED II.

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: Lithuania - -

Article 29 (2): Soil quality and soil carbon

Biomass fuels produced from waste and residues derived not from forestry but from agricultural land shall be taken into account for the purposes referred to in points (a), (b) and (c) of the first subparagraph of paragraph 1 only where operators or national authorities have monitoring or management plans in place in order to address the impacts on soil quality and soil carbon. Information about how those impacts are monitored and managed shall be reported pursuant to Article 30(3).

(i) Impacts on soil quality

Step 1: Identification of applicable laws

Have the applicable law(s) been identified?	Yes
List of applicable law(s)	Law on Soil Protection
Sources	https://e-seimas.lrs.lt - Lithuanian Legal Information System (legislation database) • https://www.am.lt - Ministry of Environment of the Republic of Lithuania • https://zum.lrv.lt - Ministry of Agriculture of the Republic of Lithuania

Step 2: Description of enforcement and monitoring by competent authorities

Description of the practical implementation and monitoring of the law(s)	In Lithuania, TOF-related biomass harvesting on agricultural or abandoned land is subject to national environmental and land use laws. The Ministry of Environment and local municipalities oversee environmental compliance, while the State Plant Service and State Soil Service may be involved in monitoring agricultural and soil-related impacts. Harvesting or clearing overgrown land requires legal land status confirmation and must not lead to degradation of soil or unauthorized land conversion.
Sources	https://www.am.lt – Ministry of Environment of the Republic of Lithuania • https://zum.lrv.lt – Ministry of Agriculture of the Republic of Lithuania • https://www.vatzum.lt – State Plant Service under the Ministry of Agriculture • https://www.nzt.lt – National Land Service under the Ministry of Agriculture • https://www.e-seimas.lrs.lt – Lithuanian Legal Information System (legislation database)
Is the enforcement and monitoring ensured for the identified law(s)?	Yes

Step 3: Evaluation of the effectiveness of the legal framework	
Evaluation of the practical implementation of the law(s) and explanation for the evaluation	The Lithuanian legal framework related to soil quality and land protection is generally effective and well-established. The legal provisions regulating land use, environmental protection, and waste/resource management are comprehensive and enforced by designated authorities, including the Ministry of Environment, National Land Service, and State Plant Service. In practice, harvesting or clearing operations on overgrown or abandoned land requires legal status confirmation, and relevant permits are often subject to oversight by municipalities and environmental inspectorates. Unauthorized land use change, including soil degradation, is subject to administrative penalties. Publicly available GIS tools (e.g., geoportal.lt) support spatial verification of land use and aid in compliance monitoring. Although some minor cases of non-compliance may occur at the local level, the overall system ensures that biomass sourced from Trees Outside Forests (TOF) does not significantly impact soil quality or result in unlawful land conversion. Thus, the legal framework is assessed as adequately implemented and effective for controlling risks related to soil quality and carbon loss from TOF feedstock operations.
Sources	https://e-seimas.lrs.lt - Lithuanian Legal Information System (legislation database) • https://www.am.lt - Ministry of Environment of the Republic of Lithuania • https://zum.lrv.lt - Ministry of Agriculture of the Republic of Lithuania • https://www.nzt.lt – National Land Service under the Ministry of Agriculture • https://www.geoportal.lt – National GIS portal for land and forest data
Is legal framework effective?	Yes
Step 4: Detailed description of a management plan and monitoring at economic operator level	At the operator level, ŽŪB Kerkasiai applies a due diligence and verification procedure to ensure that feedstock sourced from overgrown or abandoned agricultural land does not cause soil degradation or unauthorized land-use change. Before accepting biomass, each site is evaluated using official cadastral and geoportal data to confirm land status. Internal control documents are used to log supplier declarations and site assessments. Site inspections and photo documentation may be conducted for non-certified sources. In addition, the company ensures that biomass is not sourced from legally protected or erosion-prone areas. These procedures are described in the internal supply base evaluation and mass balance documentation and are reviewed annually.
(ii) Impact on soil carbon	
Step 1: Identification of applicable laws	
Have the applicable law(s) been identified?	Yes
List of applicable law(s)	Law on Land (Lietuvos Respublikos žemės įstatymas) • Law on Environmental Protection (Lietuvos Respublikos aplinkos apsaugos įstatymas) • Law on Forests (Lietuvos Respublikos miškų įstatymas) – applicable in borderline forest/non-forest TOF • Law on Waste Management • Law on Agriculture (if applicable to TOF origin land)
Sources	https://e-seimas.lrs.lt - Lithuanian Legal Information System (legislation database) • https://www.am.lt - Ministry of Environment of the Republic of Lithuania • https://zum.lrv.lt - Ministry of Agriculture of the Republic of Lithuania
Step 2: Description of enforcement and monitoring by competent authorities	
Description of the practical implementation and	The Ministry of Environment, the National Land Service, and local municipalities are responsible for enforcing legal restrictions related to land use and carbon stock protection. Biomass harvesting from TOF areas must comply with land classification and cannot involve the conversion of organic

monitoring of the law(s)	soils or wetlands that serve as carbon sinks. GIS tools (e.g., geoportal.lt) and cadastral data are used to verify site conditions and ensure that no high-carbon stock areas are affected. Operators are required to verify land condition and ensure that land management practices do not cause soil carbon loss.
Sources	• https://www.am.lt - Ministry of Environment of the Republic of Lithuania • https://zum.lrv.lt - Ministry of Agriculture of the Republic of Lithuania • https://www.nzt.lt – National Land Service under the Ministry of Agriculture • https://www.geoportal.lt – National GIS portal for land and forest data
Is enforcement and monitoring ensured for the identified law(s)?	Yes
Step 3: Evaluation of the effectiveness of the legal framework	
Evaluation of the practical implementation of the law and explanation for the evaluation	Lithuania has a functioning legal framework for regulating land use and protecting soil carbon stocks, especially in areas with high organic matter or wetland characteristics. These laws are implemented by national and local institutions including the Ministry of Environment and the National Land Service. Satellite and GIS data (via geoportal.lt) allow for spatial verification of land types, ensuring that operators do not source biomass from peatlands or other high-carbon stock areas. Enforcement is carried out through land status verification, permitting systems, and land use controls. Although there may be minor gaps in field-level oversight, the legal framework is sufficiently implemented and enforced to prevent systematic carbon stock loss from TOF biomass operations.
Sources	• https://www.am.lt - Ministry of Environment of the Republic of Lithuania • https://www.nzt.lt – National Land Service under the Ministry of Agriculture • https://www.geoportal.lt – National GIS portal for land and forest data • https://e-seimas.lrs.lt - Lithuanian Legal Information System (legislation database)
Is legal framework effective?	Yes
Step 4: Detailed description of a management plan and monitoring applied at economic operator level	ŽŪB Kerkasiai applies a risk-based internal control procedure to avoid sourcing biomass from soils with high carbon stocks (e.g., peatlands, wetlands). Before feedstock procurement, the land origin is verified using cadastral maps and geoportal layers to confirm that the site is not located in areas with organic soils or designated wetland zones. In case of uncertainty, biomass is not accepted. Records of location checks and supplier declarations are maintained as part of the company's Due Diligence System. These procedures are verified annually through internal audits, and operators are trained to recognize high-carbon land indicators.

Article 29 (3a): Protection of land with high biodiversity value

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.*
- ;

Description of a management system process to meet the requirement.	NA
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Article 29 (3b): Protection of land with high biodiversity value

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, or 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;*

Description of a management system process to meet the requirement.	NA
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Article 29 (3c): Protection of land with high biodiversity value

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:

- (c) areas designated:*
 - (i) by law or by the relevant competent authority for nature protection purposes; or*
 - (ii) for the protection of rare, threatened or endangered ecosystems or species recognised by international agreements or included in lists drawn up by intergovernmental organisations or the International Union for the Conservation of Nature, subject to their recognition in accordance with the first subparagraph of Article 30(4), unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.*
- (i)*

Description of a management system process to meet the requirement.	NA
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Article 29 (3d): Protection of land with high biodiversity value

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:

- (c) *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.*

Description of a management system process to meet the requirement.

NA

Article 29 (3e): Protection of land with high biodiversity value

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).*

Description of a management system process to meet the requirement.

NA

Article 29 (4a): Protection of land with high carbon stock

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;*

This paragraph shall not apply if, at the time the raw material was obtained, the land had the same status as it had in January 2008.

Description of a management system process to meet the requirement.

NA

Article 29 (4b): Protection of land with high carbon stock

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:

- (b) *continuously forested areas, namely land spanning more than one hectare with trees higher than five metres and a canopy cover of more than 30 %, or trees able to reach those thresholds in situ;*

This paragraph shall not apply if, at the time the raw material was obtained, the land had the same status as it had in January 2008.

Description of a management system process to meet the requirement.

NA

Article 29 (4c): Protection of land with high carbon stock

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:

- (c) *land spanning more than one hectare with trees higher than five metres and a canopy cover of between 10 % and 30 %, or trees able to reach those thresholds in situ, unless evidence is provided that the carbon stock of the area before and after conversion is such that, when the methodology laid down in Part C of Annex V is applied, the conditions laid down in paragraph 10 of this Article would be fulfilled.*

This paragraph shall not apply if, at the time the raw material was obtained, the land had the same status as it had in January 2008.

Description of a management system process to meet the requirement.

NA

Article 29 (5): Protection of peatland

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.

Description of a management system process to meet the requirement.

NA