



Supply Base Report:

Sveaskog Baltfor SIA Fourth Surveillance Audit

Sustainable Biomass Program
sbp-cert.org



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

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

Document history

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1 Overview

Producer name:	Sveaskog Baltfor SIA
Producer address:	Brivibas 40-23, LV-1050 Rīga, Latvia
SBP Certificate Code:	SBP-01-84
Geographic position:	56.954600, 24.118790
Primary contact:	Marta Ciekure, +371 26 111 329, marta.ciekure@sveaskog.se
Company website:	http://www.sveaskog.se/en/sveaskog-baltfor-sia/
Date report finalised:	16 Apr 2026
SBR reporting period from:	01 Mar 2025
SBR reporting period to:	28 Feb 2026
Name of the Certification Body:	Preferred by Nature OÜ
Certification Body Approval date:	09 Jul 2026
SBP Standard(s) used:	SBP Standard 1: Feedstock Compliance v2.0, SBP Standard 2: Feedstock Verification v2.0, SBP Standard 4: Chain of Custody v2.0, SBP Standard 5: Collection and Communication of Data v2.0, Instruction Document 1A: SBP Requirements for Primary Feedstock from Trees Outside Forests (TOF) v1.0, Instruction Document 5E: Collection and Communication of Energy and Carbon data. v2.1, Instruction Document EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413 v2.0
Feedstock origin (countries)	Latvia (all region)
Weblink to Standard(s) used:	https://sbp-cert.org/documents/standards-documents/standards

2 Description of the Biomass Producer and the Supply Base

2.1 Description of the company

Sveaskog Baltfor SIA is a wholly owned subsidiary of the Swedish forestry company Sveaskog AB and one of the leading timber trading companies in Latvia.

The company was established in 1996 under the name Baltfor Ltd. Its core activities include the supply of roundwood, wood chips, and fuel wood to industrial customers, primarily in Sweden.

In late 2009, Sveaskog Baltfor SIA expanded its operations by launching a wood chip production business.

Sveaskog Baltfor has implemented several internationally recognized certification schemes and management systems:

- SBP – Sustainable Biomass Program
- FSC® – Forest Stewardship Council
- ISO 9001:2015 – Quality Management Systems
- ISO 14001:2015 – Environmental Management Systems

The company operates actively in both local and regional markets.

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

Number of employees: 45

Annual maximum production capacity (metric tonnes): 144684

Number of direct feedstock suppliers: 327

Approximate number of feedstock sub-suppliers: 0

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

The feedstock for wood chips is primarily sourced from post-harvest forestry operations and land-clearing activities outside forest areas, as well as from residues generated by industrial wood processing.

Biomass is produced and supplied by approximately 330 different suppliers, including logging contractors, landowners, and land managers. Wood chips are collected and exported through the ports of Riga, Liepaja, Mersrags, and Skulte.

SBE refers to biomass sourced from forests and trees outside forests that meets the requirements for SBP-compliant or controlled biomass.

2.2 Detailed description of the Supply Base

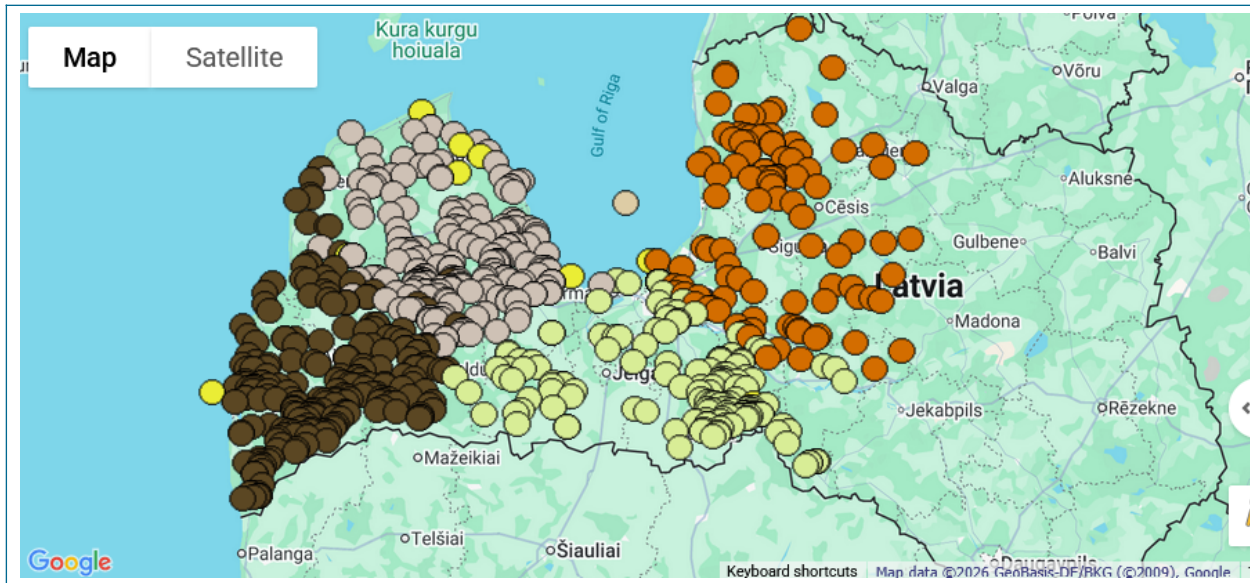
Guidance: Tables below have been generated automatically for each sourcing country based on the selection of 'Feedstock origin (countries)' in section 1 above.

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

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

Country	Latvia
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Area/Region	All region
Exclusions	No
Feedstock types	Primary, Processing residues ¹
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
Is the forest managed to supply energy and non-energy markets?	Yes - Majority
For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?	Yes - Majority
Risk assessment(s)	Yes – Regional Risk Assessment (RRA) used, Yes – Biomass Producer's own risk assessment used (SBE) , N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme
Provide a concise summary of why a SBE was determined to be required or not required here:	
SBE is the default framework for biomass feedstock supply, as the majority of biomass is sourced from non-certified forests and areas outside forests, and primary biomass is not covered by FSC or PEFC forest certification schemes. All biomass is verified within the scope of the SBE system.	
Feedstock types included in SBE:	Primary, Processing residues ¹
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):	5.7000
Map(s) of the Supply Base area:	



2.3 Feedstock information

- a. **Total volume of Feedstock:** 200,000–400,000 m³
- b. **Volume of primary feedstock:** 200,000–400,000 m³
- c. **List of all the species in primary feedstock, including scientific name:**

Betula pubescens	Birch
Betula pendula	Birch
Alnus glutinosa	Alder
Alnus incana	Gary Alder
Pinus sylvestris	Scots Pine
Picea abies	Spurce
Populus tremula	Aspen

- 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: Every year in Latvia, sanitary felling is carried out in forest areas affected by diseases or pest infestations. During the 2023/2024 period, sanitary fellings in Latvia accounted for approximately 14–15% of the total felling area. This was a significantly higher proportion than in previous years, mainly due to damage caused by the European spruce bark beetle (*Ips typographus*). A small proportion of biomass originating from such areas may be included in the supply chain.

- e. **Hardwood (i.e. broadleaf trees): specify proportion of feedstock from (%):** 62.00
- f. **Softwood (i.e. coniferous trees): specify proportion of feedstock from (%):** 38.00
- 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 (%):** 0.00
- 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:** 1–200,000 m³
Physical form of the feedstock: Offcuts
- n. **Share of SBP-recognised system claim for processing residues:**

100 % PEFC

- o. **Volume of post-consumer feedstock:** 0
Physical form of the feedstock: Offcuts
- p. **Estimated amount of EU RED-compliant sustainable feedstock that could be collected annually by the BP:**
 500000 m³
- q. **What is the estimated amount of EU RED-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated):** 500000.00 m³

Explanation: All biomass volumes meet the requirements for EU RED-compliant biomass. An EU RED-compliant biomass assessment and approval system has been implemented for both primary and secondary biomass.

3 Supply Base Risk Assessments and Risk Management Measures

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

☐ Not Applicable – Supply Base Evaluation not implemented

3.1 Summary of the Supply Base Evaluation

SIA Sveaskog Baltfor applies the Sustainable Biomass Program (SBP) Revised Regional Risk Assessment for Latvia, Version 2.0, effective from 12 July 2024.

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

3.2 Conflicts with applicable national and sub-national legislation

N/A

3.3 Risk Management Measures

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

Country: Latvia	
Area/sub-scope: All region	
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:

Sveaskog Baltfor SIA applied the Sustainable Biomass Program (SBP) Revised Regional Risk Assessment for Latvia, Version 2.0, effective from 12 July 2024.

In Latvia, the Nature Conservation Agency carried out nationwide mapping of habitats of EU importance between 2017 and 2022. According to consultations with the Nature Conservation Agency, within the project “*Preconditions for Better Biodiversity Preservation and Ecosystem Protection in Latvia*”, commonly referred to as the “*Nature Census*” (co-funded by the European Union Cohesion Fund), a total of 854,426 hectares of forest were surveyed across Latvia. Forest habitats of EU importance were identified on 334,597 hectares, of which approximately 37.5% are located within Natura 2000 territories.

The majority (80%) of the identified forest habitats of EU importance are located in state-owned forests, while only 1% are situated on municipal land and the remaining 19% in privately owned forests. In Latvia, not all Specially Protected Nature Territories (SPNTs) are designated as Natura 2000 sites. According to data provided by the Nature Conservation Agency, 42% of forest habitats of EU importance are located within SPNTs (including the Northern Vidzeme Biosphere Reserve), and 8% are situated in strict nature reserves, strict regime zones, regulated regime zones, or nature reserve zones where forest harvesting is prohibited or restricted. In addition, approximately 5.3% of these habitats are located in micro-reserves outside Natura 2000 areas.

Consequently, more than half of the forest habitats of EU importance in Latvia currently have no legal protection status and may therefore be subject to timber harvesting. In practice, this means that forest harvesting is permitted in habitats of EU importance unless they are located within restricted management zones of Specially Protected Nature Territories.

Within the framework of the Nature Census, the mapping of habitats of EU importance was conducted between 2017 and 2022. However, the mapping of protected species was not included within the scope of the project. As a result, data regarding protected species was not comprehensively collected during the surveys.

According to consultations with the Nature Conservation Agency, information on protected species remains fragmented, and not all locations hosting protected species have been identified, mapped, or legally protected. Although data on protected species locations is regularly updated, operators must implement robust due diligence procedures to assess the origin of energy wood and prevent sourcing from High Conservation Value (HCV) Category 1 areas.

Furthermore, according to the Nature Conservation Agency’s *Prioritised Action Framework (PAF) for Natura 2000 in Latvia*, suitable protected areas have not yet been designated for three species (*Unio crassus*, *Osmoderma eremita*, and *Barbastella barbastellus*) and seven habitat types of EU importance (one marine and six terrestrial habitat types). In addition, the legal designation process for protected areas is often lengthy, allowing landowners to continue forest harvesting activities while the protection status is still under establishment.

Consultations with the Nature Conservation Agency also indicate that approximately 5,000 hectares of forest habitats of EU importance have been lost due to clear-cutting since 2017 (see: *Nature Census data: In Latvia, grasslands are currently in the worst condition, while other habitat groups also require thoughtful long-term management* | Nature Conservation Agency, daba.gov.lv).

Therefore, specific risk mitigation measures have been established for HCV Category 1.

Mitigation measure:

The scope of the assessment identifies key species, habitats, ecosystems, and areas of High Conservation Value (HCV) relevant to biodiversity within the Supply Base.

Means of verification: Sveaskog Baltfor identifies sites and locations corresponding to HCV Category 1

and, where necessary, conducts compliance evaluations with or without expert involvement. The following information sources are used: the “Ozols” database, field inspections, monitoring records, interviews with supplier personnel and stakeholders, consultations with experts, species protection plans and maps, regional and publicly available data from trusted third parties, environmental NGO reports and maps, relevant websites of the State Forest Service, the Nature Conservation Agency and EU agencies, as well as applicable Latvian and EU legislation, laws, and regulations.

Feedstock origin data: The Biomass Producer (BP) always requests and verifies Cadastre Number information for each sourced load or logging site. Cadastre data is obtained from felling permits and purchase agreements. A critical step in the mitigation process involves verifying the accuracy of feedstock origin data, including the Cadastre Number of the Forest Management Unit (FMU) and the timber loading location. Verification is carried out using official information provided by the Latvian State Forest Service through the “Ozols” database and other relevant services, such as LVM GEO and the State Forest Service felling permit verification system. This process ensures that feedstock origin is accurately documented and verified.

Origin information is verified prior to entering into a supplier contract in order to prevent non-compliant material from entering the supply chain.

HCV category 1:

If the feedstock origin data identifies a habitat of a Rare, Threatened, or Endangered (RTE) species (e.g. a recorded occurrence of a specially protected species such as a bird nesting site), an onsite inspection is conducted to verify that:

- the habitat of the RTE species has been preserved in accordance with applicable legal requirements;
- the habitat has not been damaged or destroyed as a result of forest management activities; and
- the supplier has taken into account the specific habitat requirements of the RTE species and applied careful logging practices.

Where necessary, an expert opinion is obtained.

Feedstock is accepted as SBP-compliant only when the risks related to HCV Category 1 have been effectively mitigated.

Monitoring and outcomes:

The Biomass Producer mitigates risk by conducting a thorough assessment of the potential feedstock origin at the outset, in accordance with established risk mitigation procedures and guidelines.

Approximately 30 transactions were rejected over a 12-month period due to the presence of High Conservation Values (HCVs) at the source location.

In cases where a field inspection is required to confirm a low HCV risk, onsite assessments are carried out by the Biomass Producer.

Approximately 30 Forest Management Units (FMUs) were inspected in the field to verify that biologically valuable areas and species habitats had been preserved and had not been adversely affected by forest management activities.

Country: Latvia

Area/sub-scope: All region

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:	
Sveaskog Baltfor SIA applies the Sustainable Biomass Program (SBP) Revised Regional Risk Assessment for Latvia, Version 2.0, effective from 12 July 2024. Latvia has established a legal and institutional framework for the protection of forests with high nature conservation values, aligned with EU directives, the Convention on Biological Diversity (CBD), and other international agreements. The protection of species and habitats is governed by the Law on the Conservation of Species and Biotores and regulations concerning Specially Protected Nature Territories (SPNT). Forest management and harvesting activities are regulated under the Law on Forests, which imposes stricter requirements in environmentally sensitive areas, including higher minimum felling ages and restrictions on logging methods to safeguard soil, water, air quality, and biodiversity. Additional provisions protect nesting sites of endangered bird species and require the retention of habitat trees and deadwood during harvesting operations. Despite this framework, not all ecologically important forest habitats are adequately protected. Only 37.5% of EU-significant forest habitats in Latvia are located within Natura 2000 territories. Of these habitats, approximately 80% are situated in state-owned forests, 19% in private forests, and only 1% in municipal forests. Many valuable habitats remain outside legally protected areas, and inclusion within Natura 2000 territories does not automatically guarantee protection. Effective conservation depends on the implementation of territory-specific restrictions on economic activities, which vary significantly between protected areas. Mapping activities carried out under the Nature Census project (2017–2022) identified EU-significant habitats; however, protected species were not comprehensively surveyed, resulting in fragmented and incomplete data. In addition, several species and habitat types, including <i>Unio crassus</i>, <i>Osmoderma eremita</i>, and <i>Barbastella barbastellus</i>, still lack designated protected areas. The process of granting legal protection is often slow, allowing continued logging activities in ecologically sensitive areas and contributing to substantial habitat loss. Since 2017, approximately 5,000 hectares of EU-significant forest habitats have reportedly been lost due to clearcutting. Destructive practices, including the deliberate destruction of bird nests to avoid protection requirements, continue to pose significant threats to biodiversity. According to estimates by the Latvian Ornithological Society, logging activities in state forests destroy approximately 51,000 bird nests annually, affecting	

species such as the black stork and the lesser spotted eagle. These concerns have also been raised in court proceedings, where conservation organizations have submitted evidence of nest destruction. Although some critical habitats overlap with protected nature territories, many of these areas still permit active forest management, including clearcutting, due to relatively weak protection regimes. In practice, management restrictions in certain protected territories are comparable to those applied in commercial forests outside protected areas. As a result, the conservation of rare species and habitats often depends primarily on microreserves. Intensive logging practices and insufficient conservation measures continue to contribute to the decline of rare and endangered species, including the black stork and lesser spotted eagle, as well as to the unfavorable conservation status of forest bird populations in Latvia. Overall, Latvia's forest conservation framework faces several challenges, including fragmented species data, insufficient legal protection mechanisms, and ongoing conflicts between commercial forestry interests and biodiversity conservation objectives. These issues reduce the effectiveness of safeguards for High Conservation Value (HCV) areas and the species dependent upon them. This assessment specifically addresses HCV Categories 1 and 3, which relate to biodiversity and ecosystem values.

Mitigation measure:

The scope of the assessment covers threats and impacts affecting identified key species, habitats, ecosystems, and High Conservation Value (HCV) sites relevant to biodiversity within legally designated forest areas in Latvia.

Means of Verification

The Biomass Producer (BP) both desk-based evaluations and onsite audits of suppliers and forest managers. These assessments evaluate potential threats to HCV sites and areas and include compliance assessments carried out with or without expert involvement.

The information sources used during the desk evaluation are described under Indicator 2.1.1.

Feedstock Origin Data

BP consistently requests and verifies Cadastre Number information for each sourced load or logging site. Cadastre data is obtained from felling permits and purchase agreements. A critical step in the mitigation process involves verifying the accuracy of feedstock origin data, including the Cadastre Number of the Forest Management Unit (FMU) and the timber loading location.

Verification is carried out using official information provided by the Latvian State Forest Service through the "Ozols" database available at: <https://www.daba.gov.lv/public/lat/dati1/dabas/ozols/>

Additional verification sources include LVM GEO and the State Forest Service felling permit verification service. This process ensures that feedstock origin and related forest management activities are accurately documented and verified.

Origin information is verified prior to entering into a supplier contract in order to prevent non-compliant material from entering the supply chain.

HCV Category 1

If a habitat of a Rare, Threatened, or Endangered (RTE) species is identified in the feedstock origin data within the cadastral area specified in the felling permit and recorded in the "Ozols" database (e.g. a marked occurrence of a specially protected species habitat such as a bird nesting site or cave), an onsite inspection is conducted to verify that:

- the habitat of the RTE species has been preserved in accordance with applicable legal requirements;
- the habitat has not been damaged or destroyed as a result of forest management activities; and
- the supplier has taken into account the specific habitat requirements of the RTE species and applied careful logging practices.

Where necessary, an expert opinion is requested. Feedstock is accepted as SBP-compliant only if the risks related to HCV Category 1 have been effectively mitigated. Wood is accepted only after all verification steps have produced satisfactory results.

HCV Category 3

If a protected EU-important forest habitat (Woodland Key Habitat) is identified within the FMU specified in the felling permit, including in any of the relevant forest compartments, the BP follows the procedure “Criteria for Acceptance of SBP-Compliant Biomass.”

Feedstock originating from HCV Category 3 areas is not accepted as SBP-compliant. However, where forest management activities are specifically aimed at improving habitat quality, the procedure requires the BP to conduct an onsite field inspection. If the applicable criteria are fulfilled, the feedstock may be registered as SBP-compliant. In all such cases, a written expert opinion is mandatory.

Monitoring and outcomes:

The Biomass Producer mitigates risk by conducting a thorough assessment of the potential feedstock origin at the outset, in accordance with established risk mitigation procedures and guidelines.

Approximately 30 transactions were rejected over a 12-month period due to the presence of High Conservation Values (HCVs) at the source location.

In cases where a field inspection is required to confirm a low HCV risk, onsite assessments are carried out by the Biomass Producer.

Approximately 30 Forest Management Units (FMUs) were inspected in the field to verify that biologically valuable areas and species habitats had been preserved and had not been adversely affected by forest management activities.

Country: Latvia

Area/sub-scope: All region

Risk Assessment used:

- ☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim
- ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim
- ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim
- ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed
- ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim
- ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed
- ☒ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed
- ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed
- ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim
- ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim
- ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim
- ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim
- ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim
- ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim
- ☐ Biomass Producer’s own risk assessment

Indicator with specified risk:

3.2.3 feedstock shall not be sourced from forest areas in the Supply Base which, according to local definitions or norms, are classified as having combined attributes of high carbon stocks and high conservation value (HCV).

Description of the specific risk:

Sveaskog Baltfor SIA applies the Sustainable Biomass Program (SBP) Revised Regional Risk Assessment for Latvia, Version 2.0, effective from 12 July 2024.

The European Union recognizes forests, wetlands, and peatlands as critical carbon sinks, with mature and old-growth forests playing a particularly important role due to their high carbon storage capacity and biodiversity value. EU policy frameworks, including the European Green Deal and the EU Biodiversity Strategy for 2030, emphasize the protection of these ecosystems while promoting improved forest quality and resilience.

In Latvia, old-growth forests and wetland forests are considered key conservation priorities. However, extensive historical forest management and human activity have significantly altered forest ecosystems, with only approximately 8% of forest stands currently exceeding 100 years of age. Wetland forests account for around 20% of Latvia's forest area and include habitats such as bog woodlands and deciduous swamp forests, both of which are protected under EU legislation.

Forest conservation efforts in Latvia began in the early 20th century and expanded considerably prior to the country's accession to the European Union in 2004. The Nature Census project (2017–2022) substantially improved habitat mapping and integrated biodiversity data into national information systems, including the "Ozols" database. Natura 2000 territories and other protected areas provide safeguards for representative ecosystems; however, significant protection gaps remain. Many High Conservation Value (HCV) areas, including habitats of EU importance, are located outside protected territories, particularly within privately owned forests.

Current forest management practices do not always adequately address biodiversity conservation needs due to incomplete species and habitat data, insufficient integration of biodiversity considerations into sectoral policies, and limitations in the governance and management of protected areas.

Economic pressures, including increasing demand for energy wood, may encourage logging activities in ecologically sensitive areas such as wetlands. Although harvesting in excessively wet forest areas is generally limited due to high operational costs and lower timber quality, such activities may still occur during periods of increased market demand. In addition, logging remains permitted in certain protected territories where regulatory restrictions are relatively weak, and not all ecologically significant habitats, including bird nesting sites, have been comprehensively identified or effectively protected.

Despite ongoing improvements in habitat mapping and policy development, Latvia continues to face challenges in ensuring effective biodiversity protection. Old-growth forests and wetland habitats remain vulnerable due to insufficient legal safeguards, economic pressures, and the inadequate integration of conservation priorities into broader forestry and land-use policies.

Mitigation measure:

The scope of the assessment covers the identification of species, habitats, ecosystems, and High Conservation Value (HCV) sites relevant to biodiversity, including areas with high carbon stock attributes, as described under Indicators 2.1.1–2.1.3.

The Biomass Producer (BP) applies the SBP-endorsed Regional Risk Assessment for Latvia. In consultation with stakeholders, and through communication with logging and wood processing companies regarding risk mitigation options, a specified risk mitigation procedure has been developed. This procedure defines the methodology for field and onsite inspections, as well as documentation requirements.

Means of Verification

Sveaskog Baltfor SIA conducts desk-based audits to assess the presence of HCVs and high carbon stocks. In addition, the BP may conduct onsite audits of suppliers and forest managers, in accordance with the procedures described under Indicators 2.1.1–2.1.3. These audits assess potential threats to HCV sites and high carbon stock areas and result in a compliance assessment, with or without expert advice.

The BP also evaluates carbon stock in the area of interest using forest inventory database information,

historical spatial data, and remote sensing imagery.

Sveaskog Baltfor SIA does not purchase biomass sourced as a result of deforestation or from drained wetlands.

Sources of Information

The following sources are used for verification and risk mitigation:

- records of field inspections carried out to date;
- monitoring records;
- interviews with Forest Management Enterprise (FME) staff and stakeholders;
- the nature data management system “Ozols”;
- communication with experts from the Nature Conservation Agency;
- maps, interviews, and regional publicly available data from trusted third parties;
- environmental NGO reports and maps;
- relevant websites of the State Forest Service, the Nature Conservation Agency, the European Union, and the Rural Support Service (*Lauku atbalsta dienests*); and
- applicable Latvian national and EU legislation, laws, and regulations.

HCV areas are identified in accordance with the procedures described under Indicators 2.1.1–2.1.3. Areas with high carbon stocks are identified according to the definition of “high carbon stock” set out in national legislation, specifically Cabinet Regulation No. 686, *“Regulations on Sustainability and Greenhouse Gas Emission Saving Criteria, Criteria for Electricity Produced from Biomass Fuels, and the Procedures for Justifying, Certifying, and Supervising Compliance with These Criteria”* (*Noteikumi par ilgtspējas un siltumnīcefekta gāzu emisiju ietaupījuma kritērijiem, no biomasas kurināmā ražotās elektroenerģijas kritērijiem un kārtību, kādā pamatojama, apliecināma un uzraugāma atbilstība minētajiem kritērijiem*), adopted on 2 November 2022. The BP considers all areas meeting this definition to be high carbon stock areas.

All information concerning feedstock origin, risk mitigation measures, Chain of Custody (CoC), and the volume of feedstock sourced is recorded in the BP’s registers. The volume of received wood is entered into the volume register only when the delivered wood corresponds to the low-risk category and all conditions for SBP-compliant low-risk material are fulfilled.

Monitoring and outcomes:

There are currently no directly usable data sources or publicly available lists in Latvia that can be used to systematically verify whether feedstock originates from areas with high carbon stocks. To mitigate this risk, Sveaskog Baltfor SIA applies the definitions and criteria set out in the Renewable Energy Directive (RED) for identifying high carbon stock areas.

The relevant national legislation transposing these requirements is Cabinet Regulation No. 686, *“Regulations on Sustainability and Greenhouse Gas Emission Saving Criteria, Criteria for Electricity Produced from Biomass Fuels, and the Procedures for Justifying, Certifying, and Supervising Compliance with These Criteria”* (*Noteikumi par ilgtspējas un siltumnīcefekta gāzu emisiju ietaupījuma kritērijiem, no biomasas kurināmā ražotās elektroenerģijas kritērijiem un kārtību, kādā pamatojama, apliecināma un uzraugāma atbilstība minētajiem kritērijiem*), adopted on 2 November 2022.

Sveaskog Baltfor SIA considers any land-use changes occurring after January 2008 when assessing and accepting biomass feedstock.

During the reviewed reference period, no biomass purchases originating from areas with high carbon stocks were identified. Further details regarding the monitoring of risk mitigation measures are provided in the findings under Indicators 2.1.1–2.1.3 above.

Country: Latvia	
Area/sub-scope: All region	
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:	
Sveaskog Baltfor SIA applies the Sustainable Biomass Program (SBP) Revised Regional Risk Assessment for Latvia, Version 2.0, effective from 12 July 2024. Forest management and nature conservation in Latvia are regulated by the Law on Forests, the Law on the Conservation of Species and Biotopes, and the General Regulations on the Protection and Use of Specially Protected Nature Territories (SPNT). These legal frameworks establish restrictions on forest management activities based on the protection and management regime applicable to specific territories. For forests located within protected areas, forest management plans are mandatory and contain detailed provisions for the conservation of protected species, habitats, and High Conservation Values (HCVs). These plans integrate information on protected species and environmental values and define specific conservation measures, which are mapped and incorporated into operational forest management practices. The preparation of forest management plans includes an assessment of previous management cycles and the integration of updated information provided by state institutions, including the State Forest Service and the Nature Conservation Agency. In state-owned forests, management plans also address fire prevention, biodiversity conservation, soil protection, and recreational functions. Latvian regulations further govern the timing and methods of forestry operations. Restrictions apply to certain thinning and felling activities, while biodiversity protection measures require the retention of habitat trees and deadwood on harvesting sites. Nevertheless, some forestry operations, including logging during the bird nesting season (1 April – 1 July), are still permitted under certain conditions. This may negatively affect rare and endangered bird species despite existing requirements intended to protect nesting habitats. Additional environmental protection measures include the establishment of buffer zones along watercourses and actions to prevent soil erosion. Forest owners operating within protected territories are required to coordinate management activities with the responsible conservation authorities to ensure alignment with	

conservation objectives. Compliance with these legal requirements is monitored by the State Forest Service.

Despite the existing regulatory framework, biodiversity conservation in Latvia continues to face significant challenges. Economic pressures, including the dependence of rural communities on forestry-related income, continue to drive intensive logging activities, infrastructure development, and land drainage (melioration). The 5th National Report to the Convention on Biological Diversity highlights that these economic drivers may contribute to unsustainable forest management practices. In addition, the reduced occurrence of natural disturbances in certain habitats has negatively affected biodiversity and ecosystem dynamics. Assessments of HCV Categories under Indicators 2.1.1 and 2.1.2 have also identified gaps in the identification and evaluation of risks affecting key species and habitats. In the absence of comprehensive assessments and conservation measures, there is a risk that these species and habitats may not be adequately protected, maintained, or restored. Consequently, the sustainable management of forests remains challenged by both economic pressures and insufficiently detailed conservation planning and implementation.

Mitigation measure:

The scope of the assessment identifies key species, habitats, ecosystems, and areas of High Conservation Value (HCV) relevant to biodiversity within the Supply Base that must be maintained or enhanced.

Means of Verification

The Biomass Producer (BP) conducts desk-based evaluations and onsite audits of suppliers and forest managers to assess potential threats to HCV sites and HCV areas. Compliance assessments are carried out with or without expert involvement, depending on the complexity of the case.

The information sources used during the desk evaluation are described under Indicator 2.1.1.

Feedstock Origin Data

BP consistently requests and verifies Cadastre Number information for each sourced load or logging site. Cadastre data is obtained from felling permits and purchase agreements. A key component of the mitigation process is the verification of feedstock origin data, including the Cadastre Number of the Forest Management Unit (FMU) and the timber loading location.

Verification is conducted using official information provided by the Latvian State Forest Service through the “Ozols” database, as well as other relevant services such as LVM GEO and the State Forest Service felling permit verification system. This process ensures that feedstock origin is accurately documented and verified.

Origin information is verified prior to entering into a supplier contract in order to prevent non-compliant material from entering the supply chain.

HCV Category 1

If the feedstock origin data identifies a habitat of a Rare, Threatened, or Endangered (RTE) species (e.g. a recorded occurrence of a specially protected species such as a bird nesting site), an onsite inspection is carried out to verify that:

- the habitat of the RTE species has been preserved in accordance with applicable legal requirements;
- the habitat has not been damaged or destroyed as a result of forest management activities; and
- the supplier has taken into account the specific habitat requirements of the RTE species and applied careful logging practices.

Where necessary, an expert opinion is requested. Feedstock is accepted as SBP-compliant only when the risks related to HCV Category 1 have been effectively mitigated.

HCV Category 3

If a protected EU-important forest habitat (Woodland Key Habitat) is identified within the feedstock origin

data specified in the felling permit, including within any relevant forest compartment of the FMU concerned, the BP acts in accordance with the procedure “*Criteria for Acceptance of SBP-Compliant Biomass.*” Feedstock originating from HCV Category 3 areas is not accepted as SBP-compliant. However, where forest management activities are specifically intended to improve habitat quality, the procedure requires the BP to conduct an onsite field inspection. If all applicable criteria are fulfilled, the feedstock may be classified as SBP-compliant. In all such cases, a written expert opinion is mandatory.

Monitoring and outcomes:

The Biomass Producer mitigates risk by conducting a thorough assessment of the potential feedstock origin at the outset, in accordance with established risk mitigation procedures and guidelines. Approximately 30 transactions were rejected over a 12-month period due to the presence of High Conservation Values (HCVs) at the source location. In cases where a field inspection is required to confirm a low HCV risk, onsite assessments are carried out by the Biomass Producer. Approximately 30 Forest Management Units (FMUs) were inspected in the field to verify that biologically valuable areas and species habitats had been preserved and had not been adversely affected by forest management activities.

4 Stakeholder engagement

4.1 General description

Biomass Producer's stakeholder engagement start date: 17 Mar 2025

Biomass Producer's stakeholder engagement end date: 16 Apr 2025

Total number of stakeholders contacted: 32

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

17.03.2025 Sveaskog Baltfor sent out informative e-mail to 32 stakeholder addresses, the consultation took place for one month until 16.04.2025.

The risk assessment was delivered to 25 interested parties, but no comments/suggestions followed.

Communication regards risks mitigation measures per individual production sites continues daily when necessary.

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

Name	Marta Ciekure
Title	Report author
Date of report approval	16 Apr 2026

Annex 1: Detailed findings for Supply Base Evaluation indicators

Latvia All region	Indicator
1.1.1	Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.
Supply Base Verifiers	1. Regulations on felling trees outside the forest, Cabinet of Ministers Regulations No. 309, enter into force: 09.05.2012. 2. Law on protective belts, comes into force: 11.03.1997. Compliance with the rules is controlled by the local government, the Nature Protection Board, the State Inspection for the Protection of Cultural Monuments and the State Environmental Service according to their competence.
Risk Rating justification	The company purchases biomass from agricultural lands that are overgrown with bushes, overgrown ditches, as well as from infrastructure objects in the city and suburban areas. The company collects information from suppliers in the form of permits from municipalities, land owners and/or intermediaries.
Risk Rating	Low Risk

Latvia All region	Indicator
1.1.2	Legal ownership of land and resource use rights shall be respected.
Supply Base Verifiers	• Law on Land Registers, enters into force: 04.05.1993. • Civil Code of Latvia (28.01.1937) • Law "On land reform in rural areas of the Republic of Latvia" • Law "On Privatization of Land in Rural Areas" (01.09.1992) • Law "On rural land reform in the Republic of Latvia" (13.06.1990) • Law "On completion of land reform in rural areas of the Republic of Latvia" (30.10.1997). • Real Estate Cadastre Law (01.01.2006) • Law on registration of real estate in the land register (06.03.1997). • Law on state and local government land ownership rights and their provision in the land register (29.03.1995) • Law on restoration of ownership rights to objects of specially protected land (14.09.1995) Law on compensations for restrictions on economic activity in protected areas (01.06.2013) The land property registration process in Latvia is regulated by several laws and regulations. Land ownership rights can be officially registered in the Land

	Registry only if a natural person or a legal entity submits relevant documents certifying legal ownership rights. These are usually personal documents such as a passport, identity card, company registration documents, purchase/sale contracts, court orders or other documents that prove legal ownership rights.
Risk Rating justification	Biomass is purchased directly from the legal owners, then a contract is concluded that certifies that the biomass comes from properties where land ownership rights and resource use rights are respected. If the biomass is thus purchased from intermediaries, the company requests a copy of the contract from the intermediaries, which confirms who is the direct owner of the land and property. The company also checks every purchase www.kadastrs.lv before the conclusion of the contract.
Risk Rating	Low Risk

Latvia All region	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	• CITES (Convention on International Trade in Endangered Species of Wild Fauna and Flora), Entered into force in 1975. CITES: • CITES Appendices I, II and III (26.10.2023): (https://cites.org/sites/default/files/eng/app/2016/E-Appendices-2016-03-10.pdf) • EUTR (EU Timber Regulation), entered into force: March 2013. • Law "On the 1973 Washington Convention on International Trade in Endangered Species of Wild Fauna and Flora" (17.12.1996). • Regulations of the Cabinet of Ministers No. 133 "Procedure in international trade with endangered species of wild animals and plants" (06.04.1999). • Regulations of the Cabinet of Ministers No. 1139 "Procedures for storage, registration, keeping in captivity, marking, trade and issuing certificates of endangered wild species in international trade" (06.10.2009). • Regulations of the Cabinet of Ministers No. 1019 "Regulations on state fees for issuing permits and certificates, procedures for paying fees and incentives in connection with the 1973 Washington Convention on International Trade in Endangered Species of Wild Fauna and Flora" (19.12.2006). The Nature Protection Authority (Nature Protection Authority), under the Ministry of Environmental Protection and Regional Development, is Latvia's official CITES management authority. This authority is responsible for issuing permits and certificates for the import, export, re-export and import of CITES-listed species. Monitoring of EUTR requirements in Latvia: In Latvia, the responsibility for the supervision and enforcement of the EU Timber Regulation (EUTR) lies primarily with the State Forestry Service,

	which operates under the Ministry of Agriculture.
Risk Rating justification	The biomass purchased in the company does not consist of CITES or EUTR species that are applicable to agricultural areas/lands and infrastructure objects.
Risk Rating	Low Risk

Latvia All region	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	1. Law on value added tax (29.11.2012). 2. Regulations of the Cabinet of Ministers No. 17 "Application of the requirements of the Value Added Tax Law and special conditions for payment and administration of value added tax" 3. Regulations of the Cabinet of Ministers No. 40 "Rules for declaration of value added tax" 4. Regulations of the Cabinet of Ministers No. 237 "Declaration of transactions in cash" (10.04.2007) 5. Regulations of the Cabinet of Ministers No. 178 "Procedures for the application of tax reliefs stipulated in international agreements on the prevention of double taxation and the prevention of tax evasion" (30.04.2001) 6. Regulations of the Cabinet of Ministers No. 149 "Procedures for crediting taxes payable and overdue tax payments in the state budget" (18.04.2000) Regulations of the Cabinet of Ministers No. 103 "Procedure for crediting taxes, stamp duties and other mandatory payments to the state budget" (18.04.1995)
Risk Rating justification	Biomass purchased by the company from agricultural and/or infrastructure objects is purchased on the basis of contracts, the amount of tax payment is defined in the contract, from the sales made by the company. In the case of intermediaries, the company will collect copies of contracts from the intermediaries confirming that tax payments have been made.
Risk Rating	Low Risk

Latvia All region	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	Regulations on felling trees outside the forest, Cabinet of Ministers Regulations No. 309, enter into force: 09.05.2012. Compliance with the rules is controlled by the local government, the Nature Protection Board, the State Inspection for the Protection of Cultural

	Monuments and the State Environmental Service according to their competence. The owner or legal possessor of the land needs a permit from the municipality to cut trees outside the forest.
Risk Rating justification	The company purchases biomass from agricultural lands that are overgrown with bushes, overgrown ditches, as well as from infrastructure objects in the city and suburban areas. The company collects information from suppliers in the form of permits from municipalities, land owners and/or intermediaries.
Risk Rating	Low Risk

Latvia All region	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	• Environmental Protection Law - o Regulates the principles of environmental protection, including preservation of biological diversity. Determines the obligations of land owners and users regarding the preservation of natural values. • Nature Protection Act - o Determines the protection of specially protected species and habitats. Also applies to agricultural lands, if they include or border specially protected natural areas. • Land Management Act - o Determines land use, including conditions that promote sustainable management and environmental protection. • Law on specially protected natural areas. Applies to agricultural lands located in nature parks, nature reserves, reserves, etc. Includes restrictions and requirements for agricultural activity in these areas. HCV Category 1 includes the main concentrations of species listed in the Annexes of the EU Habitats Directive and mapped at national level through environmental protection and legislation. HCV 2nd category This includes large forest areas with high conservation value: UNESCO World Heritage sites, Ramsar Convention areas, forests in strictly protected nature reserves, biosphere reserves and national or regional park reserves. HCV 3rd category This includes Natura 2000 territories, biotopes of EU significance and specially protected biotope territories of Latvia. HCV category 4 This includes ecosystem protection forests and protected forests, i.e. i.e. forest areas that are important for providing basic environmental functions. Latvian national legislation defines forest protection measures that are essential for the protection of water resources, for example, the coastal

	protection zone along the Baltic Sea and the Gulf of Riga, protective belts along rivers and lakes, protective belts of marshes, protective belts around cities. <u>The categories of protected areas are more binding for forest lands, but in the context of non-forest lands, agricultural lands and/or infrastructure objects, from which biomass comes, must be evaluated abutting or bordering with these protected land categories.</u>
Risk Rating justification	When purchasing biomass from agricultural lands or infrastructure objects, the company makes sure before concluding the contract that the biomass does not come from protected lands or Natura 200 areas, where agricultural lands border Natura 2000 or other protected areas. Study of each individual purchase case before the contract is concluded. The company keeps proof of the tests performed.
Risk Rating	Specified Risk

Latvia All region	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	<u>Latvian regulatory acts</u> ● Environmental Protection Law - o Regulates the principles of environmental protection, including preservation of biological diversity. Determines the obligations of land owners and users regarding the preservation of natural values. ● Nature Protection Act - o Determines the protection of specially protected species and habitats. Also applies to agricultural lands, if they include or border specially protected natural areas. ● Land Management Act - o Determines land use, including conditions that promote sustainable management and environmental protection. ● Law on specially protected natural areas. Applies to agricultural lands located in nature parks, nature reserves, reserves, etc. Includes restrictions and requirements for agricultural activity in these areas. Taking into account the extensive use of biomass from agricultural lands, which may contain biologically high-value grasslands, pastures, meadows with protected plants, the use of hybrid species in plantations and the use of pesticides on land used for agriculture, it is considered that the risk of the existence of species, habitats, ecosystems and specially protected areas (HCVs) important for the biodiversity of the supply base is specific, therefore their identification is essential.

Risk Rating justification	When purchasing biomass from agricultural lands or infrastructure objects, the company shall make sure before concluding the contract that the biomass does not come from protected lands or Natura 200 areas, where agricultural lands border Natura 2000 or other protected areas. Study of each individual purchase case before the contract is concluded. The company keeps proof of the tests performed.
Risk Rating	Specified Risk

Latvia All region	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	- Latvia's Sustainable Development Strategy 2030. - The State Development Plan for 2007-2013 was approved in 2006. - Latvian Rural Development State Strategic Plan 2007. - Climate Change Mitigation Program 2005. - <u>Latvian regulatory acts</u> - Environmental Protection Law - Regulates the principles of environmental protection, including preservation of biological diversity. Determines the obligations of land owners and users regarding the preservation of natural values. - Nature Protection Act - Determines the protection of specially protected species and habitats. Also applies to agricultural lands, if they include or border specially protected natural areas. - Land Management Act - Determines land use, including conditions that promote sustainable management and environmental protection. - Law on specially protected natural areas. Applies to agricultural lands located in nature parks, nature reserves, reserves, etc. Includes restrictions and requirements for agricultural activity in these areas. Taking into account the extensive use of biomass from agricultural lands, which may contain biologically high-value grasslands, pastures, meadows with protected plants, the use of hybrid species in plantations and the use of pesticides on agricultural land, it is considered that the risk of the existence of species, habitats, ecosystems and specially protected areas (HCVs) important for the biodiversity of the supply base is specific, therefore their identification is essential.
Risk Rating justification	When purchasing biomass from agricultural lands or infrastructure objects, the company makes sure before concluding the contract that the biomass does not come from protected lands or Natura 200 areas, where agricultural lands border Natura 2000 or other protected areas.

	Study of each individual purchase case before the contract is concluded. Consultations with supervisory authorities and experts are underway. If it is confirmed that the protected areas do not affect the extraction areas, a low risk is applied and the biomass is purchased. The company keeps proof of the tests performed
Risk Rating	Specified Risk

Latvia All region	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	In Latvia, land transformation is a process in which the type of land use is changed (for example, from agricultural land to building land, forest land, etc.). Land transformation is regulated not by one special "Land Transformation Law", but by several regulatory acts that determine the procedure by which it may be carried out. <u>The main regulatory acts regulating land transformation in Latvia</u> 1. Land Management Law, (LV Law, valid from 01.01.2015) 2. Regulations of the Cabinet of Ministers No. 350, "Rules on classification of land use purposes" 3. Territorial Development Planning Law 4. MK regulations no. 240 (27.04.2010) "The procedure for determining and changing the purpose of land use" Unified permit system for changing the type of land use - it is regulated by each state (for example, in Latvia - municipalities + VZD).
Risk Rating justification	The company compares the configuration of the land before and after January 1, 2008, thus making sure that no transformation of the land has been carried out.
Risk Rating	Low Risk

Latvia All region	Indicator
2.2.2	Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.
Supply Base Verifiers	<u>Regulations and Ministerial Orders</u> • Rules of the MK No. 748 (06.10.2015), "Procedure for development and implementation of nature protection plan" - o Covers the protection of habitats and species also in agricultural lands. • Regulations of the Cabinet of Ministers on the rural development program (e.g. 2014-2020 or 2023-2027 period) - o The regulations include the introduction of agro-environmental and climate

	measures that contribute to the preservation of biological diversity. • Regulations of the Council of Ministers on Natura 2000 areas (e.g. No. 940) • Regulations on compensations for farmers whose land is located in Natura 2000 areas. Requirements for sustainable agriculture set by the Ministry of Agriculture, for example: Greening requirements ECO schemes (from 2023 within the EU Common Agricultural Policy) Ecosystems in Latvia are very diverse and relatively well preserved - they cover forests, grasslands, swamps, inland waters, sea coasts, agricultural landscapes and urban areas. These ecosystems provide diverse services that are essential for human well-being and the balance of nature.
Risk Rating justification	Biomass extraction is from agricultural landscapes and urban and artificial areas. Biomass does not come from biologically valuable grasslands, peatlands, bogs and wetlands.
Risk Rating	Low Risk

Latvia All region	Indicator
2.2.3	Soil quality in the Supply Base shall be maintained or enhanced
Supply Base Verifiers	• Soil Strategy for 2030 The new EU Soil Strategy defines the framework and specific measures for soil protection, restoration and sustainable use in synergy with other European green course policies; sets the vision and goals for achieving a healthy soil condition by 2050 and specific measures to be taken by 2030;
Risk Rating justification	Risk mitigation through basic best practices (e.g., avoiding wet conditions, low-impact equipment, exclusion zones near water).
Risk Rating	Low Risk

Latvia All region	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	• EU Habitats Directive 92/43/EEC – states that the destruction of habitats is an irreversible effect if compensatory or remote restoration is not possible.

	- The Latvian Environmental Protection Law - requires an environmental impact assessment if the activity can cause a significant and irreversible impact on the ecosystem. Indicators of soil sustainability - specified in the regulations of the Ministry of Interior (for example, in cases of land transformation, land reclamation, peat extraction). Criteria for determining "irreversible impact": - Recovery times exceed human lifespans (eg >100 years). - There are no technologically or financially feasible ways to restore the condition. A habitat that was unique (e.g. protected by the EU Habitats Directive) has been destroyed or significantly altered.
Risk Rating justification	While risks exist, legal buffer zones and proper contractor guidance (e.g., no felling within protected zones) provide sufficient mitigation if applied.
Risk Rating	Low Risk

Latvia All region	Indicator
2.2.5	Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.
Supply Base Verifiers	- Water Management Act (2002) - Regulations on surface and underground water quality (No. 897, 2009) - Nitrates Directive (EU 91/676/EEC) - Groundwater Directive (2006/118/EC) Regulations of the Cabinet of Ministers No. 118, Riga on March 12, 2002 (prot. No. 11 § 40), Regulations on the quality of surface and underground waters The supervisory institution is the Environmental Board. Quality, limits, risk management - Defined concentration limits for priority and dangerous substances for both surface and groundwater - Custom limits take into account natural background properties (pH, hardness, organic carbon) - Based on the precautionary principle, measures may be taken at the scene to prevent irreversible damage. Groundwater quality in Latvia can be checked in several ways - both with professional monitoring and individually, using laboratory analyses. Official state monitoring

	In Latvia, the quality of groundwater is officially monitored by: - Latvian Environment, Geology and Meteorology Center (LVĢMC) - Regional municipalities / Environmental authorities
Risk Rating justification	
Risk Rating	Low Risk

Latvia All region	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	- On pollution, enters into force: 01.07.2001. - Air Defense Act (2001) - Rules of the MK No. 1290 (17.11.2009), "Rules on air quality" - National Emission Ceiling (NEC) Directive (EU 2016/2284) - UN Convention on the Transboundary Movement of Air Pollution Information is available from the measuring stations of the Environmental Center about air pollution in Latvia. The main types of emissions regulated by law: <table> <tr> <th>Substance</th><th>Typical sources</th></tr> <tr> <td>PM10 / PM2.5</td><td>Heating, traffic, agriculture</td></tr> <tr> <td>NOx</td><td>Vehicles, industry</td></tr> <tr> <td>SO2</td><td>Industrial processes, coal burning</td></tr> <tr> <td>NH₃ (ammonia)</td><td>Agriculture, fertilizer</td></tr> <tr> <td>CO2</td><td>Fuel combustion, transport sector</td></tr> <tr> <td>VOC</td><td>Painting, solvents, fuel storage</td></tr> </table>	Substance	Typical sources	PM10 / PM2.5	Heating, traffic, agriculture	NOx	Vehicles, industry	SO2	Industrial processes, coal burning	NH ₃ (ammonia)	Agriculture, fertilizer	CO2	Fuel combustion, transport sector	VOC	Painting, solvents, fuel storage
Substance	Typical sources														
PM10 / PM2.5	Heating, traffic, agriculture														
NOx	Vehicles, industry														
SO2	Industrial processes, coal burning														
NH ₃ (ammonia)	Agriculture, fertilizer														
CO2	Fuel combustion, transport sector														
VOC	Painting, solvents, fuel storage														
Risk Rating justification	These emissions are minor, localised, and do not exceed thresholds that would require permitting or monitoring under Latvian or EU environmental law.														
Risk Rating	Low Risk														

Latvia All region	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	Main legislation

	• EU regulation no. 1107/2009 – On placing plant protection products on the market. • EU regulation no. 396/2005 – On the maximum permissible residue levels of pesticides in food. • Latvian regulatory acts: • Plant Protection Law (adopted in 1998, amended several times). • Rules of the MK No. 950 (2010) – Regulations on requirements for the use of plant protection products. Rules of the MK No. 487 (2016) – Regulations on registration of plant protection products. Approval and registration of pesticides • All pesticides used in Latvia must be registered with the State Plant Protection Service (VAAD). • Registration must be based on scientific studies on efficacy, toxicity, environmental impact, etc. • Only active substances authorized by the EU may be used in preparations. Environmentally and socially safe use • The National Action Plan for the Sustainable Use of Pesticides is being implemented in Latvia (based on EU Directive 2009/128/EC). • Supervision is carried out by VAAD, SRS, the State Environmental Service, as well as the Food and Veterinary Service (residue control in food).
Risk Rating justification	Not applicable to biomass coming from agricultural overgrown land and other infrastructure objects, as pesticides are not used in these categories. The use of pesticides is attributable to cultivated arable land, so the company assumes that biomass will not come from pesticide-treated land.
Risk Rating	Low Risk

Latvia All region	Indicator
2.2.8	Waste shall be disposed of in an environmentally appropriate manner.
Supply Base Verifiers	• Waste Management Law, enters into force: 18.11.2010. • Regulations of the Cabinet of Ministers No. 302, Regulations on waste classification and characteristics that make waste hazardous, enters into force: 27.04.2011. In Latvia, "Vides SOS" is a mobile app and reporting system developed by the State Environmental Service (VVD), which allows citizens to easily report various environmental violations. A free mobile application that allows you to indicate the location, add photos and a description of the violation. With the application, it is possible to report illegal dumping of waste (both household and bulky waste). Statistics and citizen involvement

	2018-2021 more than 5166 reports were received per year at the beginning of the year – 668 reports in the first four months, 64% about waste 2023-2024 In recent years, the activity of the society has increased - an average of 4,000-5,000 reports per year year to date - already more than 3000 reports. About 50% of submitted reports are recognized as justified.
Risk Rating justification	The company will make sure visually on site at the time of purchase of the branch stacker that the biomass does not come from areas where waste or waste dumps have been found. At the moment, no such cases of waste dumping have been detected in the mining area.
Risk Rating	Low Risk

Latvia All region	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

Latvia All region	Indicator
2.2.10	Harvested areas shall be regenerated
Supply Base Verifiers	- Regulations No. 295 (2012) – Procedure for allowing the use of agricultural land for afforestation - Rules of the MK No. 457 (2023) – State and EU support procedure for afforestation of agricultural land EU regulation no. 2021/2115 - on direct payments and rural development (includes support for afforestation) A widespread practice in Latvia is afforestation - the transformation of agricultural land into a forest - by planting trees that meet the definition of a forest (by area and crown cover density).
Risk Rating justification	The company assumes that harvested agricultural land and other infrastructure objects will be restored in the form of natural succession. Since the support measures in Latvia are aimed at afforestation of agricultural lands, but not at infrastructure objects, it is not determined that afforestation is recommended for infrastructure objects (this criterion is not applicable to this category).
Risk Rating	Low Risk

Latvia All region	Indicator
2.2.11	The impacts of natural processes such as fires, pests and diseases shall be managed.
Supply Base Verifiers	<u>Normative acts for fire safety:</u> 1. Fire safety regulations — <i>Rules of the MK No. 238 (04.04.2006), "Fire safety regulations in forest and swamp"</i> 2. Administrative responsibility law 3. State Fire and Rescue Service Law 4. Binding regulations of individual municipalities (for example, Rēzekne or Tukuma counties have specific fire safety restrictions for rural areas) 5. The law of the forest, if the fire spreads to the forest 6. Rules of the MK No. 147 (17.03.2015) – <i>Fire safety rules (general)</i> <u>Normative acts for disease and pest control:</u> 1. Plant Protection Act (2004), regulation of diseases, pests and plant quarantine. 2. Rules of the MK No. 467 (2017), "Procedures for determining, eradicating and limiting plant quarantine organisms. 3. Rules of the MK No. 936 (2005), "Regulations on forest protection against pests and diseases". 4. EU Regulation 2016/2031, Phytosanitary Regulation on EU quarantine organisms. The regulation of fires in agricultural lands in Latvia is closely related to fire safety requirements in open environments, the obligations of land owners, as well as prohibitions in certain periods (for example, during drought or fire season). Unlike forests, in agricultural lands the emphasis is on limiting the burning of meadows, stubble, reeds, grass and straw, as well as the responsibility for fire spreading to other areas. The regulation of diseases and pests in Latvia covers both the protection of plants in agriculture and the preservation of forest health. The purpose of the regulation is to prevent or limit the spread of dangerous organisms, protect crops, the environment and human health, and ensure compliance with the phytosanitary requirements of the European Union (EU). The Nature Protection Board monitors the restriction of invasive species in natural areas.
Risk Rating justification	The company will not take any additional measures, as the risk is defined as low.
Risk Rating	Low Risk

Latvia All region	Indicator
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2.2.12	Genetically modified trees shall not be used.
Supply Base Verifiers	The regulatory framework for genetically modified trees in Latvia includes several laws and EU directives, as Latvia is a member of the European Union, and EU regulations directly apply to Latvia as well. Here are the main regulatory acts: Regulation of genetically modified organisms (GMOs) in Latvia (including trees) 1. Law on the circulation of genetically modified organisms (adopted in 2005) Regulates the circulation of GMOs in Latvia, including development, testing, registration, circulation control and safety requirements. Determines the procedure for permits for the use of GMOs, requirements for environmental protection and informing the public. Applies to all types of GMOs, including genetically modified trees. 2. Biological Safety Law Regulates biosafety requirements, including GMOs and their environmental impact. 3. Agricultural and environmental protection laws Contains additional provisions on nature protection, which also apply to the cultivation of genetically modified trees. 4. European Union Regulation No. 1829/2003 and 1830/2003 on genetically modified food and feed The circulation of GMO food and feed is regulated, and Latvia, as an EU member, complies with these regulations. 5. Directive 2001/18/EC of the European Parliament and the Council on the release of GMOs into the environment Rules relating to the release of GMOs, including the cultivation of genetically modified trees, while respecting the safety of the environment. Genetically modified trees are not yet widely grown commercially in Latvia, and this area is strictly regulated. Each GMO release or commercial cultivation requires a special permit from the State Plant Protection Service and other supervisory authorities. Public information and risk assessment are mandatory regulatory prerequisites.
Risk Rating justification	The company does not buy genetically modified trees.
Risk Rating	Low Risk

Latvia
All region

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	• Water Framework Directive (Directive 2000/60/EC), • European Union (EU) Biodiversity Strategy 2030 (COM(2020) 380 final), • common agricultural policy 2023-2027 for the year • The Paris Agreement, to which the EU distribution 2021-2030 contributes. for (Regulation (EU) 2018/842), • Guidelines for the European Green Deal Russian energy imports (REPowerEU plan) LULUCF emissions are calculated using one of the following techniques Technique A Raw materials can be sourced from a country of origin that is a member of the Paris Agreement and that has submitted a nationally determined contribution to the United Nations Framework Convention on Climate Change (UNFCCC) covering carbon emissions and sequestration from agriculture, forestry and land use that ensures that changes in carbon stocks associated with biomass production are included in national commitments to reduce or limit greenhouse gas emissions, or Technique B Raw materials can be sourced from a country of origin that is a member of the Paris Agreement and where national or regional legislation (developed in accordance with Article 5 of the Paris Agreement and applicable in the extraction area) is in place to preserve and increase carbon stocks and sequestered carbon, and where there is evidence that the reported emissions of the LULUCF sector do not exceed sequestered amounts, or if the country of origin is a member of the Paris Agreement that has developed national targets Technique C Raw materials can be obtained from a supply base where the assessment shows that carbon stocks are stable and the capacity of forests to act as a carbon sink is stable or increasing in the long term.

	Research and suitability of agroforestry in Latvia Silava projects of the Latvian State Forest Institute investigate agroforestry systems that include measuring carbon benefits by integrating trees and shrubs into agricultural land. Spatial analysis identified approximately 351 ha of low-value agricultural land in Latvia suitable for agroforestry, including shrubs and trees on rural edges, with the potential for carbon monitoring.
Risk Rating justification	Latvia meets REDII LULUCF accounting criteria under Route A and Route B. TOF harvesting does not result in land use change or unaccounted emissions. No additional measures are required.
Risk Rating	Low Risk

Latvia All region	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	• Paris Agreement 15.04.2017 • EU NDC • Latvias first NDC: • European Union first NDC All extraction of raw materials is according to option A: Feedstocks can be obtained from supply bases where the supply base assessment indicates that forest carbon stocks are stable or increasing.
Risk Rating justification	Obtaining biomass from agricultural areas and infrastructure objects is a positive outcome that helps the energy industry of Latvia to grow, where the total amount of carbon is below 30 t/ha, which is not a high indicator.
Risk Rating	Low Risk

Latvia All region	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	• Water Framework Directive (Directive 2000/60/EC), • European Union (EU) Biodiversity Strategy 2030 (COM(2020) 380

	final), • common agricultural policy 2023-2027 for the year • The Paris Agreement, to which the EU distribution 2021-2030 contributes. for (Regulation (EU) 2018/842), • Guidelines for the European Green Deal • Russian energy imports (REPowerEU plan) Silava projects of the Latvian State Forest Institute investigate agroforestry systems that include measuring carbon benefits by integrating trees and shrubs into agricultural land. Soil organic carbon data - relevance to shrubs Recent research has analyzed soil organic carbon content (SOC) in 197 sites (agricultural land and grassland) in Latvia - useful background data to compare shrub-influenced field edges with typical SOC of agricultural land. Data from Latvia show a similar SOC stock in grasslands and forested lands, suggesting that shrub monitoring could reveal comparable carbon sequestration.
Risk Rating justification	The primary raw materials are not obtained from areas where productivity is low and which are classified as low-yielding or difficult to renew according to local definitions or norms.
Risk Rating	Low Risk

Latvia All region	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	High Carbon Stock Legislation: • Paris Agreement 15.04.2017 • EU NDC • Latvias first NDC: • European Union first NDC Legislation for HCV areas: • Latvia's Sustainable Development Strategy 2030. • The State Development Plan for 2007-2013 was approved in 2006. • Latvian Rural Development State Strategic Plan 2007. • Climate Change Mitigation Program 2005. <u>Latvian regulatory acts</u> • Environmental Protection Law • Nature Protection Act • Land Management Act

	• Law on specially protected natural areas The total carbon data in Latvia show that the total amount of carbon is below 30 t/ha, which is not a high indicator, therefore, obtaining biomass from agricultural areas and infrastructural objects is positive for the energy sector. Several important biotopes and protected species, which are particularly important for the preservation of biological diversity, can be found in agricultural lands in Latvia. These areas often include semi-natural grasslands, wetlands, as well as extensively managed areas that promote the presence of diverse species.
Risk Rating justification	The company will evaluate the simultaneous fulfillment of both criteria separately at the time of purchase. Will retain documented evidence. If, in the event of a risk study, the company certifies that the biomass does not come from such areas, the biomass will be purchased.
Risk Rating	Specified Risk

Latvia All region	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	• Regulations on felling trees outside the forest, Cabinet of Ministers Regulations No. 309, enter into force: 09.05.2012. Energetic wood and shrubs In Latvia ~1 million. ha of arable land is overgrown with shrubs, and it is estimated that approximately 40 m³ of shrub wood grows on 1 ha of such areas This wood is currently most often burned in the field or used as biomass raw material - for the production of wood chips, briquettes, pellets.
Risk Rating justification	Biomass parts coming from agricultural lands or infrastructure facilities can be of a diameter corresponding to the range of pulpwood. The company will evaluate each purchase separately.
Risk Rating	Low Risk

Latvia All region	Indicator
4.1.1	Freedom of association and the right to collective bargaining shall be respected in the workplace.
Supply Base Verifiers	Relevant laws and regulations governing the freedom of association and the

	right to collective bargaining • Labor Law https://likumi.lv/ta/id/26019-darba-likums 10.pants, 18.pants, 21.-27.pants., Article 33, Clause 5, Article 101, Clause 6., 110.pants https://likumi.lv/doc.php?id=66827 • Regulations of the Cabinet of Ministers No. 427. Procedure for election and operation of trustees. point 4, point 5, Clause 21, Clause 22. 1. https://likumi.lv/ta/lv/starptautiskie-ligumi/id/646 - 1948 Convention on Freedom of Association and Protection of the Rights of Association (C87). Parts I and II (ratified in Latvia on 27.01.1993) 2. https://likumi.lv/ta/lv/starptautiskie-ligumi/id/677 - 1949 Convention on the Right to Organize and Collective Bargaining (C98). Articles 1-7. (Ratified in Latvia on 27.01.1993)
Risk Rating justification	An employment contract has been concluded. Employee register available. The "FSC Beneficial Working Environment Policy" has been implemented and approved by management in the company.
Risk Rating	Low Risk

Latvia All region	Indicator
4.1.2	Forced or compulsory labour shall not be used.
Supply Base Verifiers	• Labor Law https://likumi.lv/ta/id/26019-darba-likums • Law on labor disputes https://likumi.lv/ta/id/67361-darba-stridu-likums?&search=on • Micro-enterprise tax law https://likumi.lv/ta/id/215302-mikrouzņēmumu-nodokļa-likums • Medicine Law https://likumi.lv/ta/id/44108-arstniecības-likums?&search=on • Law "On maternity and sickness insurance" https://likumi.lv/ta/id/38051-par-maternitātes-un-slimības-pabalstiem • Law "On Taxes and Fees" https://likumi.lv/ta/id/33946-par-nodokļiem-un-nodevām • Law on voluntary work https://likumi.lv/ta/id/275061-brīvprātīgā-darba-likums • Cabinet of Ministers 28.05.2002. regulations No. 206 "Regulations on

jobs in which it is forbidden to employ teenagers and exceptions when employment in these jobs is allowed in connection with the professional training of teenagers" <https://likumi.lv/ta/id/62644-rules-par-darbiem-kuros-aizliegts-nodarbinat-pusaudzus-un-iznemumi-kad-nodarbinasana-sajos-darbos-ir-atlauta-saistiba-ar-pu...>

- Cabinet of Ministers 07.09.2010. regulations No. 827 "Rules on the registration of mandatory state social insurance contributors and reports on mandatory state social insurance contributions and personal income tax" <https://likumi.lv/ta/id/217642-noteikumi-par-valsts-socialas-apdrosinasanas-obligato-iemaksu-veiceju-registraciju-un-zinojuimus-par-valsts-socialas-apdrosinas...>
- Cabinet of Ministers 12.10.2010. regulations No. 969 "Procedure in which expenses related to business trips are reimbursed", <https://m.likumi.lv/doc.php?id=220013>
- of the Cabinet of Ministers on 20.11.2012. regulations no. 785 "Regulations on educational practice organizations and learners' insurance", <https://likumi.lv/ta/id/252862>
- Cabinet of Ministers 07.04.2015. regulations No. 167 "Regulations on employee certificates" <https://likumi.lv/ta/id/273311-rules-on-employee-certificates>
- of the Cabinet of Ministers on 24.11.2015. regulations No. 656 "Rules on the amount of the minimum monthly salary within normal working hours and the calculation of the minimum hourly rate" <https://likumi.lv/ta/id/278067-noteikumi-par-minimalas-menesa-darba-algas-apmeru-normala-darba-laika-ietvaros-un-minimalas-stundas-tarifa-likmes-aprekinasanu>
- Cabinet of Ministers 05.07.2016. regulations no. 445 of the "Teachers' Salary Regulation" <https://likumi.lv/ta/id/283667>

Relevant laws and regulations controlling forced labour

1. Labor Law <https://likumi.lv/ta/id/26019-darba-likums>
 - point 5,
 - 28.pants,
 - 100.pants
2. Civil Law <https://likumi.lv/ta/id/225418-civillikums>
 - 1459-1462. pants,
 - 1463 – 1468. pants,
 - 1635.pants,
 - Article 2178 - 2195 (Employment contract)
3. <https://likumi.lv/doc.php?id=132859> On forced labor convention
 - Article 2 (Definition of what is considered and what is not considered forced labor, but is considered compulsory labor)
 - 7., pants,
 - 11.pants,
 - 12.pants,
 - 16.pants,
 - 17.pants,

	4. https://likumi.lv/ta/lv/starttautiskie-ligumi/id/41 Forced Labor Convention (ratified in Latvia on 02.06.2006) 5. https://www.vdi.gov.lv/lv/media/1970/download - pages 7, 8, 9. information on illegally employed persons in Latvia from 2018-2020. The company is aware and complies with the requirements the relevant Latvian and international laws and regulations related to forced labor in employment.
Risk Rating justification	An employment contract has been concluded. Employee register available.
Risk Rating	Low Risk

Latvia All region	Indicator
4.1.3	Child labour shall not be used.
Supply Base Verifiers	The supervisory institution is the Labor Inspectorate The company is aware of the relevant Latvian and international laws and regulations related to child employment. In 2006, Latvia ratified several international ILO conventions - the Convention on the Worst Forms of Child Employment (C182), the Minimum Age Convention (C138) and the UN Convention on the Rights of the Child, Child Trafficking. The company is aware of the binding national regulations on the employment of children: jobs in which children may not be so employed, wages for persons under 18 years of age, etc. Before concluding an employment contract, identity documents are checked to ensure the correctness of personal data.
Risk Rating justification	An employment contract has been concluded. Employee register available. The company has implemented and approved by the management a "Conducive Working Environment Policy" for outsourcing services, which stipulates that they will comply with the FSC's Contributory Working Environment Policy
Risk Rating	Low Risk

Latvia All region	Indicator
4.1.4	Workers shall not be discriminated in hiring, remuneration, access to training, promotion, termination or retirement.
Supply Base Verifiers	- Relevant laws and regulations that control discrimination in employment and occupation - Labor Law https://likumi.lv/ta/id/26019-darba-likums

	• Article 7. The principle of equal rights • Article 8. The right to organize. • Article 14.1. Obligations of the employer when sending an employee to work in Latvia. Clause 7. • Article 29. Prohibition of differential treatment. • Article 32. Job advertisement. Paragraphs 1 and 2. • Article 33. Job interview. Point 2. • Article 34. Violation of the prohibition of differential treatment when establishing employment legal relations. Paragraph 1. • Article 60. Equal pay • https://likumi.lv/ta/lv/starttautiskie-ligumi/id/689 - C100 - 1951 Convention on Equal Remuneration. Article 2 (ratified in Latvia on 27.01.1993) • https://likumi.lv/ta/lv/starttautiskie-ligumi/id/1630 - Convention on the Rights of Persons with Disabilities (ratified in Latvia on 01.03.2010) • https://eur-lex.europa.eu/legal-content/LV/TXT/?uri=CELEX:32000L0078 – Council Directive 2000/78/EC (27 November 2000) establishing a common framework for equal treatment in employment and occupation The company is aware of the relevant Latvian and international laws and regulations related to discrimination in employment. In 1993, Latvia ratified several international conventions - the ILO Convention on Equal Remuneration (C100), the UN Convention on the Rights of Persons with Disabilities, the Council Directive establishing a common system for equal treatment of employment and profession. The company is aware of the binding laws and regulations of Latvia related to forced labor. These conditions are mentioned - in the Labor Law, the Civil Law and the Law on Forced Labor Convention.
Risk Rating justification	An employment contract has been concluded. Employee register available.
Risk Rating	Low Risk

Latvia All region	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	• Labor Law (Articles 59, 61), MK regulations on minimum wages • Rules of the MK No. 656 • State Labor Inspection Law • SRS procedures and guidelines Monitoring and control • State Labor Inspection (VDI):

	- o Checks whether at least the minimum wage is paid and the principle of equal pay is observed - o Allows anonymous messages from employees about labor law violations (including "envelope" salaries) • State Revenue Service (SRS): - o Monitoring of wages paid in "envelopes" (tax compliance)
Risk Rating justification	The company observes the principle of minimum wage payment, wages are higher than the minimum wage. Principles of good practice are followed.
Risk Rating	Low Risk

Latvia All region	Indicator
4.1.6	Working hours shall comply with legal requirements.
Supply Base Verifiers	1. Labor Law • The main law governing the working time regime, the number of working hours, overtime, rest time, breaks and shift work. 2. Regulations of the Cabinet of Ministers (MK) No. 294 "Regulations of working time and rest time" • The organization of working time, rest time, breaks, shift work and overtime are regulated in detail. • The regulations also provide for special requirements for different types of work (for example, work with a monitor, work in night shifts). 3. MK regulations no. 265 "Regulations on overtime work" - Determines the overtime payment procedure, limitations and employer's obligations in relation to overtime.
Risk Rating justification	In the company's office, working hours are 8 hours in the office. Total working hours are set for production workers and port workers. There have been no reprimands from the State Labor Inspectorate
Risk Rating	Low Risk

Latvia All region	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	• Relevant laws and regulations controlling forced labour • Labor Law https://likumi.lv/ta/id/26019-darba-likums point 5, 28.pants, 100.pants • Civil Law https://likumi.lv/ta/id/225418-civillikums

	1459-1462. pants, 1463 – 1468. pants, 1635.pants, - Articles 2178 - 2195 (Employment contract), https://likumi.lv/doc.php?id=132859 On forced labor convention - Article 2 (Definition of what is considered and what is not considered forced labor, but is considered compulsory labor) 7., pants, 11.pants, 12.pants, 16.pants, 17.pants, https://likumi.lv/ta/lv/starttautiskie-ligumi/id/41 Forced Labor Convention (ratified in Latvia on 02.06.2006) https://www.vdi.gov.lv/lv/media/1970/download - pages 7, 8, 9. information on illegally employed persons from 2018-2020 in Latvia. The company is aware of the relevant Latvian and international laws and regulations related to forced labor in employment. In 2006, Latvia ratified the international ILO convention - Forced Labor Convention (C29). The company is aware of the binding laws and regulations of Latvia related to forced labor. These conditions are mentioned - in the Labor Law, the Civil Law and the Law on Forced Labor Convention.
Risk Rating justification	The company has introduced and approved by the management the "FSC Beneficial Working Environment Policy" and the company's code of ethics and conduct.
Risk Rating	Low Risk

Latvia All region	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	- of the Cabinet of Ministers on 08.09.2008. regulations No. 723 "Regulations on the requirements of competent institutions and competent specialists in labor protection issues and the procedure for assessing competence" https://likumi.lv/ta/id/181060-noteikumi-par-prasibam-kompetentam-institucijam-un-kompetentiem-specialistiem-darba-aizsardzibas-jautajumos-un-kompetentes-nove... - Cabinet of Ministers 02.10.2008. regulations No. 803 "Labor protection

	requirements for exposure to carcinogenic substances at workplaces" https://likumi.lv/ta/id/181871-darba-aizsardzibas-prasibas-saskaroties-ar-kancerogenam-vielam-darba-vietas • Cabinet of Ministers 10.03.2009. regulations No. 219 "Procedure in which the mandatory health check-up is carried out", https://likumi.lv/ta/id/189070-kartiba-kada-veicama-obligata-veselibas-parbaude • of the Cabinet of Ministers on 28.04.2009. regulations No. 359 "Labor protection requirements in workplaces" https://likumi.lv/ta/id/191430-darba-aizsardzibas-prasibas-darba-vietas • Cabinet of Ministers 25.08.2009. regulations No. 950 "Procedures for investigation and accounting of accidents at work", https://likumi.lv/ta/id/196653-nelaimes-gadijumu-darba-izmeklesanas-un-uzskaites-kartiba • Cabinet of Ministers 03.08.2010. regulations No. 713 "Regulations on the procedure for providing training in first aid and the minimum medical materials for the first aid kit" https://likumi.lv/ta/id/214608-noteikumi-par-kartibu-kada-nodrosina-apmacibu-pirmas-palidzibas-sniegsana-un-pirmas-palidzibas-aptiecinas-medicinisko-materialu... • Cabinet of Ministers 10.08.2010. regulations No. 749 "Training procedure in labor protection issues", https://likumi.lv/ta/id/214922-apmacibas-kartiba-darba-aizsardzibas-jautajumos • Cabinet of Ministers 20.04.2012. rules No. 195 "Machine safety rules" https://likumi.lv/ta/id/173016-masinu-drosibas-rules The supervision of labor protection principles is carried out by the Labor Inspectorate.
Risk Rating justification	The company conducts regular training for employees on both certification systems and work safety.
Risk Rating	Low Risk

Latvia All region	Indicator
4.1.9	Mechanisms shall be in place for resolving grievances and disputes in the workplace.
Supply Base Verifiers	• Submissions Law - general procedure for submissions • The Administrative Procedure Law - the procedure for complaints against the decisions of institutions • Law of the Constitutional Court - constitutional complaints • Prosecutor's Office Law, FID regulations - institution-specific regulations • EU regulation and internal rules of PATTC, LTAB - procedure of special sectors Specialized complaints mechanisms

	Discrimination complaints: submitted to public sector institutions (for example, Labor Inspection, Consumer Rights Protection Center) or administratively - in accordance with the Law on Administrative Procedure. There can be both administrative and criminal sanctions. Supervisory institutions - Prosecutor's Office
Risk Rating justification	The company has developed a complaints procedure.
Risk Rating	Low Risk

Latvia All region	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	• Labor Protection Act (2002) Determines the duties, rights, responsibility and implementation of EU directives of the employer and employees. • The EU "umbrella" directive 89/391/EEC and its supplementary directives apply Includes individual articles: 7-8 articles – work environment risk assessment and internal monitoring Article 18 – the right to refuse hazardous work and receive compensation if the employer does not fulfill the measures. • Regulations on mandatory health check-up and registration of occupational diseases, investigation of accidents are necessary for both occupational risk management and prevention. • Enterprises with a certain number of employees or the level of operational risks must establish an organizational system of labor protection - they must hire a labor protection specialist or receive services from external institutions. • Regulations of the Cabinet of Ministers (MK) on labor protection Includes a wide range of specific rules: • "Labor protection requirements in workplaces" (No. 359) • Requirements for employee training (No. 749), provision of first aid (No. 713) • Risks of occupational diseases, chemicals, vibration, noise, electromagnetism, etc. binding rules
Risk Rating justification	The company has implemented measures for regular OVP. Supervised by a labor protection specialist. Instruction logs are maintained and annual, initial and re-instructions are conducted.
Risk Rating	Low Risk

Latvia	Indicator
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All region	
4.2.1	Negative social and community impacts shall be identified and avoided.
Supply Base Verifiers	The main regulatory acts in the field of employment and unemployment in Latvia • Labor Law Regulates legal labor relations, conclusion and termination of employment contracts, working conditions, wages, rights and obligations of employees. It also determines working hours, rest, vacations and labor protection. • Employment Law (adopted in 1999) Regulates state and local government policy in employment promotion, unemployment prevention, professional training issues. Determines the status of the unemployed and the right to social support. Regulates the activities of the State Employment Agency (NVA) and employment promotion measures. • Law on Social Services and Social Assistance Includes social assistance mechanisms, including social support for the unemployed, benefits, services according to the employment situation. Rules for granting unemployment status and payment of unemployment benefit • Regulations of the Cabinet of Ministers, which regulate in detail the procedure for granting unemployment status, registration, calculation and payment of unemployment benefits. • Law on the State Employment Agency Determines the tasks, functions and rights of the NVA to ensure mutual connection between job seekers and employers. Broader context and trends The level of regional differences in Latvia is among the highest in the EU and the OECD - population and economic activity are concentrated in Riga/Pierīga, the situation is less favorable in Latgale. Long-term perspective (2024.1 quarter) – total unemployment was 7.4%, this reflects the broader economic situation beyond registered unemployment. 15-74 yrs. 69.5 thousand unemployed in the group. Conclusions • Strong regional inequality – Riga and Pierīga with low employment risk, Latgale and other regions with similar problems. • Registered unemployment ranges from ~3.7% to 10.5% depending on the region. • Total unemployment around 7-7.5% nationwide (broadly defined). • The duration and structure of unemployment differ significantly by region - the risk of long-term unemployment is the highest in Latgale.
Risk Rating justification	The company employs outsourcing services in the extraction of biomass from local parishes, thus ensuring the fulfillment of this criterion.
Risk Rating	Low Risk

Latvia All region	Indicator
4.2.2	Feedstock sourcing shall positively contribute to the local economy, including employment.
Supply Base Verifiers	The main regulatory acts in the field of employment and unemployment in Latvia • Labor Law Regulates legal labor relations, conclusion and termination of employment contracts, working conditions, wages, rights and obligations of employees. It also determines working hours, rest, vacations and labor protection. • Employment Law (adopted in 1999) Regulates state and local government policy in employment promotion, unemployment prevention, professional training issues. Determines the status of the unemployed and the right to social support. Regulates the activities of the State Employment Agency (NVA) and employment promotion measures. • Law on Social Services and Social Assistance Includes social assistance mechanisms, including social support for the unemployed, benefits, services according to the employment situation. Rules for granting unemployment status and payment of unemployment benefits • Regulations of the Cabinet of Ministers, which regulate in detail the procedure for granting unemployment status, registration, calculation and payment of unemployment benefits. • Law on the State Employment Agency Determines the tasks, functions and rights of the NVA to ensure mutual connection between job seekers and employers.
Risk Rating justification	The company employs outsourcing services in the extraction of biomass from local parishes, thus ensuring the fulfillment of this criterion. Outsourcing list, signed contracts.
Risk Rating	Low Risk

Latvia All region	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

Latvia All region	Indicator
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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 There are no indigenous peoples and no communities.
Risk Rating	Low Risk

Latvia All region	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	• Submissions Law - general procedure for submissions • The Administrative Procedure Law - the procedure for complaints against the decisions of institutions • Law of the Constitutional Court - constitutional complaints • Prosecutor's Office Law, FID regulations - institution-specific regulations EU regulation and internal rules of PATTC, LTAB - procedure of special sectors Specialized complaints mechanisms Discrimination complaints: submitted to public sector institutions (for example, Labor Inspection, Consumer Rights Protection Center) or administratively - in accordance with the Law on Administrative Procedure. There can be both administrative and criminal sanctions. Supervisory institutions - Prosecutor's Office
Risk Rating justification	The company has developed a complaints procedure.
Risk Rating	Low Risk

Latvia All region	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 There are no indigenous peoples and no communities.
Risk Rating	Low Risk

Latvia All region	Indicator
4.2.7	Designated cultural heritage sites shall be preserved.
Supply Base Verifiers	The main normative acts in the protection of cultural heritage in Latvia

	1. Law on the Protection of Cultural Monuments • Determines the protection of cultural monuments (including archaeological, historical, architectural, artistic and other), their registration, methods of protection and responsibility for non-compliance with protection requirements. • Protected areas and cultural-historical ensembles are also regulated. 2. Law on protected natural and cultural values of the state and municipalities • Complements the Law on the Protection of Cultural Monuments by also determining the legal regulation of protected natural and cultural values. 3. Law on local governments • Determines the rights and obligations of local governments regarding the protection of cultural heritage at the local level. 4. Regulations of the State Inspection for the Protection of Cultural Monuments • Regulates the work of the inspectorate, which monitors the state of cultural monuments and compliance with protection require Protection of cultural heritage sites: • Register of cultural monuments - information on protected places and objects is collected and maintained. • Protection zones - areas around cultural heritage objects that are subject to special restrictions (eg building regulations, environmental protection). • Restoration and maintenance - financing and technical assistance is provided from state and European Union funds. • Educational events and informing the public about the importance of cultural heritage. Supervisory institutions: • The State Inspection for the Protection of Cultural Monuments (VKPAI) – monitors and controls the preservation and use of cultural heritage. • Ministry of Culture - creates policy and coordinates cultural heritage protection measures. • Local government cultural departments – responsible for the supervision and protection of local heritage objects. National Cultural Heritage Board (NKMP) – supports restoration, research and conservation works.
Risk Rating justification	The company evaluates each purchase case separately, following up on coordinated works, in which areas and ensuring the protection of cultural heritage sites.
Risk Rating	Low Risk

Annex 2: EU RED Supply Base Evaluation

Countries where EU RED Supply Base Evaluation is used	
Country	Latvia
Area	All region
Sustainable harvesting criteria 29(6)	
(i) The legality of harvesting operations	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ 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
Level A risk assessment description	Level A for Latvia by Ministry of Agriculture of the Republic of Latvia (RED III)
Level B management system at the level of the forest sourcing area	N/A
(vi)⁶ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (5): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was peatland in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.</i>	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	Level A for Latvia by Ministry of Agriculture of the Republic of Latvia (RED III)
Level B management system at the level of the forest sourcing area	N/A
(vii) that installations producing biomass fuels from forest biomass, issue a statement of assurance, underpinned by company-level internal processes, for the purpose of the audits conducted pursuant to Article 30(3), that the forest biomass is not sourced from the lands referred to in point (vi).	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	Level A for Latvia by Ministry of Agriculture of the Republic of Latvia (RED III)
Level B management system at the level of the forest sourcing area	<i>Not applicable, requirement only applies to Level A</i>

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

Annex 2a: EU RED II Supply Base Evaluation

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

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

Verification and monitoring of suppliers

The BP has one PEFC-certified supplier of processing residues.

The BP has signed the relevant agreements and self-declarations.

The processing residues are supplied with either a PEFC 100% or PEFC Controlled Sources claim.

Feedstock inspection and classification upon receipt

All feedstock consisting of processing residues is visually inspected during loading, chipping, and receipt.

All relevant delivery documentation is maintained and available.

Supplier audit for processing residues and post-consumer feedstock

The BP has conducted on-site audit of supplier of processing residues.

The audit process is documented.

The feedstock has been visually inspected.

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

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

Country: Latvia - All region

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)	MK 309; MK 310; Nr. 614
Sources	https://likumi.lv/ta/id/247350-noteikumi-par-koku-cirsanu-arpus-meza

Step 2: Description of enforcement and monitoring by competent authorities

Description of the practical implementation and monitoring of the law(s)	From the owner appropriate Outside the forest origin of the wood felled certificate of origin. In the process of purchasing the wood for each site verification of ownership. Regular tax payments of taxes and fees are regularly made. Verification prior to timber harvesting in the natural data management system 'OZOLS' (https://ozols.gov.lv/pub). If the non-forest land shows a grassland or pasture habitat, then, the owner must be 'habitat management plan', which includes information on vegetation removal of the habitat conservation and maintenance for the purpose of If such 'habitat management plan' does not exist, such a plan must be established (in which case contact DAP). Without a "habitat management plan", indicating the possibility of felling of vegetation, wood may not be included in controlled timber in the wood stream
Sources	"OZOLS" (https://ozols.gov.lv/pub).
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	Competent authorities such as the State Environmental Protection Service (VAAT) and the National Land Service carry out regular inspections to determine whether soil protection requirements are met. In certain cases, activities that cause damage to the environment or soil may be suspended or restricted. This may include the suspension of agricultural activities. Laws may require landowners or users to restore disturbed soil conditions. For example, it can be restoration of degraded soil or cleanup of contaminated soil.
Sources	http://vvd.gov.lv/lv?utm_source=https%3A%2F%2Fwww.google.com%2Fhttps://www.vmd.gov.lv/lv
Is legal framework effective?	Yes
Step 4: Detailed description of a management plan and monitoring at economic operator level	The company complies with soil conservation requirements and follows certain rules and laws that ensure sustainable use of forests and soil protection: -Each collection site (supply base) is assigned a unique number with information on the supplier, raw materials, supply base, accompanied by traceability documents; the company checks the raw material property, if it does not fall within protected areas, for cadastral number or geographical coordinates of the site VMD data Collate: - Extract from the property register: - Contract with the supplier; - Self-declaration. From the owner appropriate Outside the forest origin of the wood felled certificate of origin. In the process of purchasing the wood for each site verification of ownership. Regular tax payments of taxes and fees are regularly made. Verification prior to timber harvesting in the natural data management system 'OZOLS' (https://ozols.gov.lv/pub). If the non-forest land shows a grassland or pasture habitat, then, the owner must be 'habitat management plan', which includes information on vegetation removal of the habitat conservation and maintenance for the purpose of If such 'habitat management plan' does not exist, such a plan must be established (in which case contact DAP). Without a "habitat management plan", indicating the possibility of felling of vegetation, wood may not be included in controlled timber in the wood stream.
(ii) Impact on soil carbon	
Step 1: Identification of applicable laws	
Have the applicable law(s) been identified?	Yes
List of applicable law(s)	https://likumi.lv/ta/id/270317-zemes-parvaldibas-likums https://likumi.lv/ta/id/42348-aizsargjoslu-likums https://likumi.lv/ta/id/147917-vides-aizsardzibas-likums https://likumi.lv/ta/id/2825-meza-likums https://likumi.lv/ta/id/27981-nekustama-ipasuma-lietosanas-merku-noteikšanas-un-sistematizacijas-kartiba https://www.zm.gov.lv/lv/informacija-par-zemes-lietojuma-zemes-lietojuma-mainas-un-mezsaimniecibas-lulucf-pasakumiem-latvija?utm_source=https%3A%2F%2Fwww.google.com%2F
Sources	https://likumi.lv
Step 2: Description of enforcement and monitoring by competent authorities	
Description of the practical implementation and monitoring of the law(s)	The practical implementation and monitoring of laws on soil carbon impact in Latvia are carried out through various institutions, programs and control mechanisms. According to the Forest Law, long-term forest management plans are being developed, which aim to promote the sustainable use and restoration of forests. Afforestation and the maintenance of forest areas contribute to soil carbon sequestration and overall climate change mitigation. Legislation on the protection of peatlands provides for strict protection of these areas against degradation or desiccation. Wetland restoration projects and peatland management plans are carried out in accordance with the environmental policy. Protected area laws restrict agriculture, logging and other activities that

	candisrupt the soil carbon cycle. Monitoring is carried out by the Environmental Protection Agency, the State Forest Service, the Ministry of Agriculture.
Sources	https://likumi.lv
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	Implementation of laws on soil carbon protection in Latvia is a complex but necessary process. Practical actions include promotion of sustainable farming, protection of forests and peatlands, financial support for land users and strict monitoring by public authorities
Sources	https://www.zm.gov.lv/lv/lauksaimniecibas-gada-zinojumi https://likumi.lv/ta/id/51662-augu-aizsardzibas-likums https://new.lkkc.lv/lv/nozares/augkopiba/tiesa-seja-ka-iespeja-samazinat-co2-emisijas
Is legal framework effective?	Yes
Step 4: Detailed description of a management plan and monitoring applied at economic operator level	In order to prevent wood raw material from entering the company's supply chain from areas with high carbon reserves and/or from areas with high environmental value: -Each collection point (supply base) is given a unique number with information about the supplier, raw materials, supply base, documents proving traceability are attached; - It is checked whether the territory is not included in the protected territories in the state cadastre of protected territories https://stvk.lt/ ; - Evidence is collected that the raw material meets the SBP requirements: the supplier's declaration, supply chain documents are needed to prove the origin of the wood; - Clauses related to the implementation of SBP requirements are included in the contract. -A risk assessment procedure is carried out and SBP suppliers are registered in the register of qualified suppliers according to the company's SBP procedure; -Suppliers are audited on-site in accordance with the SBP procedure (properties with potential signs of large carbon stocks, for example near peatlands, wetlands, old forests) using a risk assessment questionnaire to assess non-compliance with SBP requirements

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.	Each collection point (supply base) is given a unique number with information about the supplier, raw materials, supply base, documents proving traceability are attached; - It is checked whether the territory is not included in the protected territories in the state cadastre of protected territories https://www.daba.gov.lv/lv/aizsargajamo-teritoriju-
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	platiba?utm_source=https%3A%2F%2Fwww.google.com%2F -Evidence is collected that the raw material meets the SBP requirements: the supplier's declaration, supply chain documents are needed to prove the origin of the wood; - Clauses related to the implementation of SBP requirements are included in the contract. -A risk assessment procedure is carried out and SBP suppliers are registered in the register of qualified suppliers according to the company's SBP procedure; -Suppliers are audited on-site in accordance with the SBP procedure (properties with potential signs of large carbon stocks, for example near peatlands, wetlands, old forests) using a risk assessment questionnaire to assess non-compliance with SBP requirements.
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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.	Each collection point (supply base) is given a unique number with information about the supplier, raw materials, supply base, documents proving traceability are attached; - It is checked whether the territory is not included in the protected territories in the state cadastre of protected territories https://www.daba.gov.lv/lv/aizsargajamo-teritoriju-platiba?utm_source=https%3A%2F%2Fwww.google.com%2F -Evidence is collected that the raw material meets the SBP requirements: the supplier's declaration, supply chain documents are needed to prove the origin of the wood; - Clauses related to the implementation of SBP requirements are included in the contract. -A risk assessment procedure is carried out and SBP suppliers are registered in the register of qualified suppliers according to the company's SBP procedure; -Suppliers are audited on-site in accordance with the SBP procedure (properties with potential signs of large carbon stocks, for example near peatlands, wetlands, old forests) using a risk assessment questionnaire to assess non-compliance with SBP requirements.
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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.

Each collection point (supply base) is given a unique number with information about the supplier, raw materials, supply base, documents proving traceability are attached; - It is checked whether the territory is not included in the protected territories in the state cadastre of protected territories https://www.daba.gov.lv/lv/aizsargajamo-teritoriju-platiba?utm_source=https%3A%2F%2Fwww.google.com%2F -Evidence is collected that the raw material meets the SBP requirements: the supplier's declaration, supply chain documents are needed to prove the origin of the wood; - Clauses related to the implementation of SBP requirements are included in the contract. -A risk assessment procedure is carried out and SBP suppliers are registered in the register of qualified suppliers according to the company's SBP procedure; -Suppliers are audited on-site in accordance with the SBP procedure (properties with potential signs of large carbon stocks, for example near peatlands, wetlands, old forests) using a risk assessment questionnaire to assess non-compliance with SBP requirements.

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.	Each collection point (supply base) is given a unique number with information about the supplier, raw materials, supply base, documents proving traceability are attached; - It is checked whether the territory is not included in the protected territories in the state cadastre of protected territories https://www.daba.gov.lv/lv/aizsargajamo-teritoriju-platiba?utm_source=https%3A%2F%2Fwww.google.com%2F -Evidence is collected that the raw material meets the SBP requirements: the supplier's declaration, supply chain documents are needed to prove the origin of the wood; - Clauses related to the implementation of SBP requirements are included in the contract. -A risk assessment procedure is carried out and SBP suppliers are registered in the register of qualified suppliers according to the company's SBP procedure; -Suppliers are audited on-site in accordance with the SBP procedure (properties with potential signs of large carbon stocks, for example near peatlands, wetlands, old forests) using a risk assessment questionnaire to assess non-compliance with SBP requirements.
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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.	Each collection point (supply base) is given a unique number with information about the supplier, raw materials, supply base, documents proving traceability are attached; - It is checked whether the territory is not included in the protected territories in the state cadastre of protected territories https://www.daba.gov.lv/lv/aizsargajamo-teritoriju-platiba?utm_source=https%3A%2F%2Fwww.google.com%2F -Evidence is collected that the raw material meets the SBP requirements: the supplier's declaration, supply chain documents are needed to prove the origin of the wood; - Clauses related to the implementation of SBP requirements are included in the contract. -A risk assessment procedure is carried out and SBP suppliers are registered in the register of qualified suppliers according to the company's SBP procedure; -Suppliers are audited on-site in accordance with the SBP procedure (properties with potential signs of large carbon stocks, for example near peatlands, wetlands, old forests) using a risk assessment questionnaire to assess non-compliance with SBP requirements.
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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.

Each collection point (supply base) is given a unique number with information about the supplier, raw materials, supply base, documents proving traceability are attached; - It is checked whether the territory is not included in the protected territories in the state cadastre of protected territories https://www.daba.gov.lv/lv/aizsargajamo-teritoriju-platiba?utm_source=https%3A%2F%2Fwww.google.com%2F -Evidence is collected that the raw material meets the SBP requirements: the supplier's declaration, supply chain documents are needed to prove the origin of the wood; - Clauses related to the implementation of SBP requirements are included in the contract. -A risk assessment procedure is carried out and SBP suppliers are registered in the register of qualified suppliers according to the company's SBP procedure; -Suppliers are audited on-site in accordance with the SBP procedure (properties with potential signs of large carbon stocks, for example near peatlands, wetlands, old forests) using a risk assessment questionnaire to assess non-compliance with SBP requirements.

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.

Each collection point (supply base) is given a unique number with information about the supplier, raw materials, supply base, documents proving traceability are attached; - It is checked whether the territory is not included in the protected territories in the state cadastre of protected territories https://www.daba.gov.lv/lv/aizsargajamo-teritoriju-platiba?utm_source=https%3A%2F%2Fwww.google.com%2F -Evidence is collected that the raw material meets the SBP requirements: the supplier's declaration, supply chain documents are needed to prove the origin of the wood; - Clauses related to the implementation of SBP requirements are included in the contract. -A risk assessment procedure is carried out and SBP suppliers are registered in the register of qualified suppliers according to the company's SBP procedure; -Suppliers are audited on-site in accordance with the SBP procedure (properties with potential signs of large carbon stocks, for example near peatlands, wetlands, old forests) using a risk assessment questionnaire to assess non-compliance with SBP requirements.

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.	Each collection point (supply base) is given a unique number with information about the supplier, raw materials, supply base, documents proving traceability are attached; - It is checked whether the territory is not included in the protected territories in the state cadastre of protected territories https://www.daba.gov.lv/lv/aizsargajamo-teritoriju-platiba?utm_source=https%3A%2F%2Fwww.google.com%2F -Evidence is collected that the raw material meets the SBP requirements: the supplier's declaration, supply chain documents are needed to prove the origin of the wood; - Clauses related to the implementation of SBP requirements are included in the contract. -A risk assessment procedure is carried out and SBP suppliers are registered in the register of qualified suppliers according to the company's SBP procedure; -Suppliers are audited on-site in accordance with the SBP procedure (properties with potential signs of large carbon stocks, for example near peatlands, wetlands, old forests) using a risk assessment questionnaire to assess non-compliance with SBP requirements.
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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.	Each collection point (supply base) is given a unique number with information about the supplier, raw materials, supply base, documents proving traceability are attached; - It is checked whether the territory is not included in the protected territories in the state cadastre of protected territories https://www.daba.gov.lv/lv/aizsargajamo-teritoriju-platiba?utm_source=https%3A%2F%2Fwww.google.com%2F -Evidence is collected that the raw material meets the SBP requirements: the supplier's declaration, supply chain documents are needed to prove the origin of the wood; - Clauses related to the implementation of SBP requirements are included in the contract. -A risk assessment procedure is carried out and SBP suppliers are registered in the register of qualified suppliers according to the company's SBP procedure; -Suppliers are audited on-site in accordance with the SBP procedure (properties with potential signs of large carbon stocks, for example near peatlands, wetlands, old forests) using a risk assessment questionnaire to assess non-compliance with SBP requirements.
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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).