Supply Base Report:

HMPK OÜ
First 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:	HMPK OÜ
Producer address:	Lubjaahju 3, 92411 Kärdla, Estonia
SBP Certificate Code:	SBP-11-05
Geographic position:	59.006320, 22.744640
Primary contact:	Andrus Ilumets, +372 564 886 06, andrus@hmpk.ee
Company website:	
Date report finalised:	14 Nov 2025
SBR reporting period from:	20 Jun 2024
SBR reporting period to:	19 Jun 2025
Name of the Certification Body:	Control Union Certifications BV
Certification Body Approval date:	07 Jan 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 REDII: Bridging requirements of the SBP scheme for meeting REDII. v1.2, Instruction Document EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413
Feedstock origin (countries)	Estonia (Eesti islands Hiiumaa & Saaremaa & Eesti counties)
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

HMPK OÜ founded in 1997, based in Hiiumaa island, Estonia. HMPK OÜ specializes in forest harvesting and forest management, including logging and reforestation, have been active in heavy duty storm (hurricane) clearings in France, Germany, Poland and Sweden. HMPK OÜ have been an experienced producer and supplier of biomass over 28 years. HMPK OÜ is shiptrader, as well the company performs the feedstock to local consumers. HMPK OÜ have been a business partner to most of forest concerns, pulp- and timber industries of the region of Baltic Sea. HMPK OÜ is also biomass producer - Wood chips are produced from logging recidues, undergrowth brush and low grade wood that is not utilized as commercial timber

Abt 5 % of the produced wood chips for energy is currently directed to export, mainly to Finland and Denmark. HMPK OÜ is also supplier of wdd chips to local heating plants.

Ports and storages used for export: Central storage in Lõpe-Ala base Hiiumaa), Heltermaa terminal (base Hiiumaa) , Virtsu terminal (base Läänemaa) and Rohuküla-Kiltsi (base Läänemaa)

Company is FSC and PEFC certified. Transfer system is used when handling FSC and PEFC products.

SBP feedstock is sourced from cerified and unsertified privat and state forests. FSC DDS (Due Diligence System) and SBP risk assessment measures are used for all transactions.

Removal of the roots is not part of the harvesting operations.

Biomass from agricultural land and on natural coastal meadows.. This is minor share of the total biomass produced by HMPK. Evaluated share from agricultural land is maximum 3 % of the total annual volume produced by HMPK and is not sourced as part of agricultural activity but as a cleaning of the agricultural land (ols hayland and over the decades unused fields) from naturally grown bushes and young trees. No legislation is regulating such clearing process , except agreements with land-owners and incase protected habitats where Nature conservation act and conditions set by Board of Environment have to be followed. Removal of the roots is not part of the process. With such management practicies used it is not possible to do more damage to the soils compared to regular agricultural and meadow work activities that could take regulary place on that land. Therefore all TOF Material is classified as Urban and Landscape Feedstock.

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

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

Number of employees: *21*

Annual maximum production capacity (metric tonnes): *100000*

Number of direct feedstock suppliers: *36*

Approximate number of feedstock sub-suppliers: *14*

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

HMPK is buying the feedstock from forest owners of logging companies - residues and/or firewood is purchased in the forest stock as a standing forest (before harvesting) or in HMPK storage yards. Part of the feedstock material is coming from HMPK's own forests.

HMPK sources feedstock from suppliers who operate under strict cpmpliance with national laws and sustainability standards. Material from Estonia is covered by the Supply Base Evaluation (SBE) under SBP certificate scope.

HMPK is FSC and PEFC certified. Average number of DDS tires in the supply chain is 1,360 for entire transaction with forest materials. Risk assessment is executed on regular basis and mitigation measures for mixing in the supply chain evaluated as low risk, no findings from field vertifications if undertaken as a control measure during all certified past of the company HMPK.

Origin of felling site is allways known and supported by proper documentation. All incoming and outgoing material is tracked through E-waybills (rear cases we use legal paper waybills) and DESKIS.s and EVR systems that records each truck load origin, volume and end-point - providing complete traceability of feedtock movements.

Before the purchase transaction - the material is allways physically revieved by the HMPK representative.

Maretial from private forests - usually is bought as stored next to the felling site road side.. Segregation of the material on the felling site is controlled by HMPK representative. Material from the State forest - usually is bought in HMPK storage yards.

Chipping operation of the SBP feedstock is done onsite in the forest storages and woodchips are transported directly to HMPK storage yards. Some material is bought and chipped in HMPK storage yards. Chipping and transport is executed by HMPK's own trucks and chippers. Cotractors are used by request.

Feedstock information regarding transport distances is provided and recorded by HMPK.

Incase material is bought at the storage yards - then it to be supplied with electronic waybills wit requested information of origin, all risks is controlled before material is received.

2.2 Detailed description of the Supply Base

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

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

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

Country	Estonia
Area/Region	Eesti islands Hiiumaa & Saaremaa & Eesti counties
Exclusions	
Feedstock types	Primary feedstock

Feedstock Product Groups	Forest feedstock (1A), Trees outside forest (TOF) - Urban and landscape feedstock (2A)
Feedstock inputs	SBP Compliant feedstock , SBP Controlled feedstock
Is the forest managed to supply energy and non-energy markets?	Yes - Majority
For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?	Yes - Majority
Risk assessment(s)	Yes – Regional Risk Assessment (RRA) used, Yes – Biomass Producer's own risk assessment used (SBE)
Provide a concise summary of why a SBE was determined to be required or not required here:	
In order to sell material as SBP compliant feedstock - HMPK has decided to add SBE to the scope of certificate. Input to SBP feedstock - is both certified and uncertified material. SBE determined to mitigate the specified risks to a low level.	
Feedstock types included in SBE:	Primary feedstock
Includes EU RED SBE:	Yes
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	Yes
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	2.3250
Map(s) of the Supply Base area:	
Supply Base Area and related FMU are be identified through Forest Portal http://register.metsad.ee/avalik/	


Soome laht
Hanko
Haabneeme
Loksa
Kunda
Aseri
Tabasalu
TALLINN
Kuusalu
Kohtla-Järve
Paldiski
Saue
Jüri
Kehra
Kadrina
Rakvere
Kohtla-Nõmme
Rummu
Aespa
Tapa
Kohila
Kose
Tamsalu
Järva-Jaani
Kärdla
Rapla
Haapsalu
Kehtna
Koeru
Märjamaa
Paide
Mustvee
Türi
Jõgeva
Lihula
Vändra
Võhma
Põltsamaa
Kallaste
Pärnu-Jaagupi
Lavassaare
Suure-Jaani
Raadi
Audru
Pärnu
Viljandi
Tartu
Törvandi
Nõo
Kuressaare
Elva
Kilingi-Nõmme
Räpina
Otepää
Põlva
Tõrva
Liivi laht
Mazsalaca
Antsla
Võru
Salatsi
Valga
Valka
Strenči
Valmiera
Roja
Limbaži
Smiltene
Alūksne
Cēsis
Talsi
Saulkrasti
Gulbene
Sigulda
Balvi

2.3 Feedstock information

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

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

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

Alnus glutinosa	Black Alder
Alnus incana	Grey Alder
Betula pendula	Birch
Betula pubescens	Dawny (Swamp) Birch
Fraxinus excelsior	Ash
Acer platanoides	Maple
Picea abies	Spruce
Pinus sylvestris	Pine
Populus tremula	Aspen
Tilia cordata	Linden
Ulmus glabra	Elm
Salix spp	Willow
Larix spp	Larch
Quercus robur	Oak
Corylus avellana	Hazel
Juniperus communis	Juniper

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: Some of the sanitary harvesting have been done due to the spruce bark beatle attacks and due to the windfells/storm clearings. Major feedstock used in the biomass is the part of regular harvesting.

e. **Hardwood (i.e. broadleaf trees): specify proportion of feedstock from (%)**: 65.00

f. **Softwood (i.e. coniferous trees): specify proportion of feedstock from (%):** 35.00

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 (%):** 25.00

j. **Select forest type(s) where the primary feedstock was sourced from:** Mix of The Above

k. **Select the main harvesting system(s) used for the sourced primary feedstock:** Mix of the above

l. **Volume of primary feedstock from primary forest:** 100000 tonnes

m. Volume of processing residues feedstock: 0
Physical form of the feedstock: N/A

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

o. Volume of post-consumer feedstock: 0
Physical form of the feedstock: N/A

p. Estimated amount of EU RED-compliant sustainable feedstock that could be collected annually by the BP: 100000 tonnes

q. What is the estimated amount of EU RED-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated): 2500000.00 tonnes

Explanation: Sustainable feedstock of entire Suply Base - felling rate is around 11,5 milj scbm, out of that approximetly 30% is low grade firewood and forest residues, 3,450.000 milj. scbm makes abt 2,500.000 milj tonnes unseasoned basis (average moisture delivered abt 38%)

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

HMPK established mitigation measures of rlated specified risks to assess and downgrade the risks to low level from feedstock originating from such areas where the risks may occur. To reduce the risk from high conservative value forests and meet the demand for SBP-Compliant biomass - HMPK will undertake a Supply Base Evaluation for primary feedstock that is originating fro Estonia according to the SBP Framework Standard 1: Feedstock Compliance Standard and Standard 2: Vertification of SBP-Compliant Feedstock.

Supply Base Evaluation is carried out based on SBP-endorsed and revised Regional Risk Assessment for Estonia (Version 2,0) as published on 12. July 2024

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

and regarding REDIII risk assessment HMPK is using::

"REDIII Level A risk assessment for Estonia for Estonia Forest v1.0 Draft" published for consultatuin on May 19th, 2025 https://sbp-cert.org/documents/consultation-documents/archive/rediii-level-a-risk-assessment-for-forest-feedstock/
See in bold: **"Biomass Poducers can use the consultation draft to demonstrate compliance with the REDIII Level A reqiurements. If any of the risk ratings in the final REDIII Level A Risk Assessments differ from those in the consultation draft, the Biomass Producer must update its Supply Base Evaluation accordingly."** HMPK will follow that approach and requirements set by SBP. Incase there will be any changes in the risk asessment - HMPK will update its SBE accordingly, as required above.

HMPK considers the risk assessment results adequate and sufficient to be used also for non-forest land. Same risk mitigation activities apply for non-forest land and it is considered more stricter approach than creating separate risk assessment for non-forest land.

Biomass from agricultural land is not sourced as part of agricultural activity but as clearing the agricultural land (old hayland and unused fields) from bushes and young trees. No legislation is regarding such clearing process (except protected habitants where nature conservation Act and conditions set by Board of Environment have been followed). The operation contains only cuttung the materialabove the ground, removal of the roots is not part of that process.. Same practices are implemented as its done in the forest.Same origin related data is collected as it is done with forest biomass. With such management practices used it is not possible to do more damage to the soil compared to normal agricultural activities that could take place on that particular land. Therefore all TOF Material is classifiead as Urban and Landscape feedstock.

For TOF material the same SBP regional risk assessments are used as for forest material (see Revised Regional Risk Assessment for Estonia V2,0). HMPK considers the SBP risk assessment for non-forest land.

3.2 Conflicts with applicable national and sub-national legislation

No conflicts identified. Most of the risks are avoided via following local legal requirements. Self control and assessment oblicatory.

3.3 Risk Management Measures

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

Country: Estonia	
Area/sub-scope:	
Risk Assessment used:	
	☐SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☒SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.1.1 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.	
Description of the specific risk:	
From SBP risk assessment "Risk conclusion and justification" The above analysis suggest that althrough the key species, ecosystems and HCVs in the forests are generally identified, but some WKHs and Natura2000 forest land could be not inventoried abd therefore need indentification and thus indication is assigned a specified risk. Risk is related to WKHs and Natura2000 forest habitats on Natura2000 protection areas that have not been inventoried.	
Mitigation measure:	
HMPK has established following mitigation measures: 1. Signed environmental agreement with each supplier. 2. Control through national database for indentification of Woodland Key Habitats (WKH) and Natura2000	

3. Control through registers established by experts for potential WKH
4. Use of experts
5. One-site field visits.

HMPK will vertify all deliveries of primary feedstock which have been harvested in Estonia. Regarding material coming from FSC certified forests with FSC100% claim - there is no "green line" to become SBP compliant feedstock. Additional comtrol to be done to vertify that FSC certified forest owner has procedures in place to identify and avoid fellings in WKHs. Same goes to PEFC claims.

HMPK will carry out the following control procedure within the SBE prior to the reception and registration of primary feedstock:
a) Origin data control - felling permit, waybill, handover act - to be controlled and rewiewed to ensure material is sourced legally. If some of the required documents is missing - material can not be sourced.
b) HMPK is controlling all FMUs before purchasing them, as per abowe p.2. and p3.
c) vertification of origin information provided - via (state) registers: forest registery, EVR waybill datbase, kinnistusraamat.ee ref owners info, WKH register, DESKIS electronic waybill database solution is used to monitor and analyse the shipments.
d) It si not allowed to issue felling permits to Narura2000 forest habitat types, Estonian Environmental Departement is evaluating before isuuing the felling permit, HMPK accept only authorized felling permits.

The outcome of these control measures - is to eliminate material form WKHs and Natura 2000 forest habitat compartments.

Monitoring and outcomes:

Established mitigation measures provide following monitoring and outcomes (numbered as per mitigation measure):
1. Agreement defines and describes the risk (material originating from HCV areas) , what shall be avoided. Purpose to inform forest owners , suppliers and their sub- suppliers about the risk and material originating from such origin can not be sourced/delivered. Outcome - no findings.
2. Before material acceptance - control of felling licences to be carried out through Forest Portal to identity - is the cutting licence approved by Environmental Departement and are there any specific restrictions or to identity Natura2000 areas.Purpose to identify and avoid material origin from the risk areas. Outcome - no findings.
3. Before material acceptance - control of potential WKH register. Purpose to identify and avoid material origin from the potential risk areas.
4. Incase material may originate from any potential HCV area - a licenced expert on-site visit report shall accompany the delivery, whitch states that no potential HCV exist in the specified area. Purpose to identify and avoid material from the potential risk area.
5. HMPK competent rep carries out field visits before the harvesting activities - to identity any potential risk and to understand the forest owners or suppliers level of understanding the specific risks. Purpose to assess the knowledge of risk indicator & mitigate any potential risks in suppliers and sub-suppliers level.

Country: Estonia	
Area/sub-scope:	
Risk Assessment used:	
	☐SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☒SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.1.2 Threats to and impacts on the identified key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified and evaluated.	
Description of the specific risk:	
From SBP risk assessment: "Risk conclusion and justification" **The above analyses suggest that some WKHs and Natura2000 forest land are not inventoried and thus threats to and impacts on the identified key species , habitats, ecosystems and HCV pertaining to biodiversity in these areas are not known.** **Therefore - the risk class for this indication is assessed to be specified.** Risk related to HCV values in the WKHs and Natura2000 forest habitats on Natura2000 protection areas that have not been inventoried. So incase rist related unindentified WHKs and Natura2000 forest habitats on Natura2000 protection areas is mitigated as mentioned under 2.1.1. then related risk HCV values will also be mitigated. Same mitigation process as mentioned under 2.1.1. is used to mitigate the risk related to 2.1.2.	
Mitigation measure:	
Same mitigation measures as mentioned iunder 2.1.1 is used to mitigate the risk related to 2.1.2.	
Monitoring and outcomes:	
Same monitoring and outcomes as mentioned under 2.1.1. used to monitor the risk related to 2.1.2.	

Country: Estonia	
Area/sub-scope:	
Risk Assessment used:	
	☐SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☒SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.1.3 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.	
Description of the specific risk:	
From SBP ris assessment: " Risk conclusion and justification" **As the above analysis suggest - the enhansement and maintainanceof key species, habitats, ecosystems and HCVs pertaining to bioduvercity in some WKHs and Natura2000 forest land cannot be quaranteed (in some privat forests).** **Therefore the level of risk for this indicator is assessed as "specified".** . Risk is related to cutting of WKHs and Natura2000 forest habitats on Natura2000 protection areas.	
Mitigation measure:	
Same mitigation measures as mentioned under 2.1.1. is used to mitigate risk related to 2.1.3. HMPK performs following steps before accepting the feedstock: 1. Has supplier signed the Environmental Agreement (Code of Conduct)? 1.1. If yes - go to p.2 1.2 If no - the material can not be sourced 2. Can the material be traced back to the logging site in the forest? 2.1 If yes - go to p.3 2.2 If no - the product cannot be sourced 3. Is there a felling permit issued? 3.1 If yes - go to p. 5 3.2 If no - go to p. 4 4. Legal felling without felling permit 4.1 If there are no WHKs or Natura2000 forest habitats on the FMU according to the database and site visit control - the material can be sourced.	

4.2 If there is WHK or Natura2000 forest habitats on FMU, the material cannot be sourced.
5. Does the logging site defined in the felling permit, provided with the suppliers material mach with the WKH or Natura2000 forest habitat type area?
5.1 If yes - the material cannnot be sourced
5.2 If no - the material can be sourced

Monitoring and outcomes:

Established mitigation measures provide following monitoring and outcomes same as mentioned under 2.1.1.

At the present moment HMPK does not have statistics - how many new WHKs and Natura2000 forest habitat types were identified and protected by HMPK. After the rejection of sourcing of such material - HMPK do not collect and register this information.

Country: Estonia

Area/sub-scope:

Risk Assessment used:

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

Indicator with specified risk:

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

Description of the specific risk:

From SBP risk assessment: "Risk conclusion and justification"
Based on the evidence reviewed - the risk for non-compliance with this indication is concluded to be specified. Related to the risk conclusion - see also indicators 2.1.1 and 2.1.3

There is a risk areas with COMBINED attributes of HCV and high carbon stock remain unindentified. Here with HCVs the WHKs and Naura2000 forest habitat types on Natura2000 protection areas are ment.

So - if the risk of indentification of WKHs and Natura2000 forest habitat types or Natura2000 protection areas (see 2.1.1) is mitigated and also risk of cutting WHKs and Natura2000 forest habitat types on Natura2000 protection areas (see 2.1.3) is mitigated - then also risk regarding 3.2.3 is mitigated. Same risk mitigation as for 2.1.1 and 2,1,3 applies.

Mitigation measure:

Same measures as for 2.1.1 and 2.1.3 to mitigate risk related HCV1 and HCV3. HCV2 - areas of large woodland territories: UNESCO world heritage sites, Ramsar sites, forests in strict nature reserves, boisphere reserves, reserves of national and regional parks. Mentioned protection objects are not a separate protection areas in Estonia (except National Park as separate type of protection area) but those are kind of different status types of normal protection areas in Estonia - like: Nature conservation area, Landscape conservation area,etc. Majority of those protection areas have additional different status like Ramsar area, Natura bird area, Natura nature area etc. All those have their own protection REGIME with strict protection and limited management zones,. Valuable areas (including wetlands and high carbon stock areas) are under strict protection zones and there is no management allowed and not possible to get felling permit at all.

Related potential risks are mitigated via following restrictions set by Environmental Departement.

IMPORTANT to make sure there is felling permit issued for material originating from such areas to ensure that any HCV values are not damaged (see risk mitigation for 2.1.1 and 2.1.3). Environmental Departement do not issue felling permit if there is a risk of damaging habitats or species of protection areas. HCV 4 and water protection zone related potential risks are mitigated by following legislation requirements to not conduct cutting in the 1-20 meters (depending on the natural water body type) wide strict protection shore zone. This is considered strict zone and removal of material can be domne only in special circumstances but not as a normal forest management. CAT5 is N7A since there are no other indigenous people besides Estonians and no local communities who have fundamental needs related to forests. With HCV6 organization has not identified overlap with HCS. Most of the cultural objects that are established by people are on mineral soils where it is possible to built or create parks (manor parks, urban forests etc.) or incase of natural historical sites these are also places with good access and non-wet soils. Historical sites are usually not located on high carbon value wetlands. Based on that - no mitigation is required.

Monitoring and outcomes:

The controls conducted - could be rewiewed and registered by HMPK , as well regarding the rejected operations based on findings of WKHs and Natura2000 forest habitats on the planned sourcing areas. We do not have information registered - about the number of felling permits that were pushed back by Environmental Departement due to the findings of Natura2000 forest habitats.

Such monitoring has not been done yet. Incase HMPK will start to collect and register such data in the future - then there will be statistics - now many new WHKs and Natura2000 forest habitat types were identified and protected.

4 Stakeholder engagement

4.1 General description

Biomass Producer's stakeholder engagement start date: 29 Aug 2025

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

Total number of stakeholders contacted: 13

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

All together 13 direct stakeholders were included in the engagement process. 10 municipalities where majority of feedstock is sourced. Estonian Private Forest Association (which includes 20 Forest cooperatives and in total abt 9000 forest owners), Estonian Forest and Wood Industries Association and local forest society

Stakeholders were contacted via e-mail to give opportunity and enough time tincase any questions arise.

4.2 Response to stakeholder comments

Stakeholder description: Engaged stakeholders

Stakeholder comment: No comments

Response to the stakeholder: No response required

5 Report updates and approval

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

Updated to new STD V2,0 requirements
Updated regional SBP risk assessment and SBP RED III Level A risk assesment for Estonia Forest v1.0 Draft used. (published for consultation on May 19th, 2025

Name	Andrus ILUMETS
Title	Management representative
Date of report approval	14 Nov 2025

Annex 1: Detailed findings for Supply Base Evaluation indicators

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

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	Indicator

1.1.2	Legal ownership of land and resource use rights shall be respected.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	**Indicator**
1.1.3	Feedstock shall be legally harvested, supplied and produced, including in compliance with CITES, EUTR and other applicable legal trade requirements.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	**Indicator**
1.1.4	Payments for harvest rights and feedstock, including duties, relevant royalties and taxes related to timber harvesting shall be complete and up-to-date.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	**Indicator**
1.1.5	There shall be adequate protection of the Supply Base from unauthorised and illegal activities, such as illegal logging, mining, and encroachment.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	**Indicator**
2.1.1	Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.
Supply Base Verifiers	Same risk mitigation activities apply as described in SBP section 3 "Risk management measures", indicator 2.1.1.

Risk Rating justification	Forest land risk rating is used. See the justification under 1.1.1.
Risk Rating	Specified Risk

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	**Indicator**
2.1.2	Threats to and impacts on the identified key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified and evaluated.
Supply Base Verifiers	Same risk mitigation activities apply as described in SBP section 3 "Risk management measures", indicator 2.1.2.
Risk Rating justification	Forest land risk rating is used. See the justification under 1.1.1.
Risk Rating	Specified Risk

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	**Indicator**
2.1.3	Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.
Supply Base Verifiers	Same risk mitigation activities apply as described in SBP section 3 "Risk management measures", indicator 2.1.3.
Risk Rating justification	Forest land risk rating is used. See the justification under 1.1.1.
Risk Rating	Specified Risk

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	**Indicator**
2.2.1	Feedstock shall not be sourced from land that had one of the following statuses in January 2008 and no longer has that status due to land conversion: a. Forests b. Wetlands c. Peatlands d. Highly biodiverse grasslands.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	**Indicator**
2.2.2	Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.
Supply Base Verifiers	N/A

Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	**Indicator**
2.2.3	Soil quality in the Supply Base shall be maintained or enhanced
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	**Indicator**
2.2.4	Where the removal of harvest forest residues and/or stumps occurs, this shall not lead to irreversible negative impacts to the ecosystem.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	**Indicator**
2.2.5	Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	**Indicator**
2.2.6	Air emissions shall comply with national legislation or in the absence of national legislation with industry best practice.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	Indicator
2.2.7	Pesticides shall only be used as part of an Integrated Pest Management (IPM) plan in compliance with national legislation, chemical safety data sheets and industry best practice. Banned pesticides shall not be used.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	Indicator
2.2.8	Waste shall be disposed of in an environmentally appropriate manner.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	Indicator
2.2.9	Harvesting levels shall be justified as to how they can be sustained with reference to inventory and growth data for the Supply Base.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	Indicator
2.2.10	Harvested areas shall be regenerated
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	Indicator
2.2.11	The impacts of natural processes such as fires, pests and diseases shall be managed.

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

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	**Indicator**
2.2.12	Genetically modified trees shall not be used.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	**Indicator**
3.1.1	LULUCF emissions shall be accounted for through one of the following routes: Route A Feedstock may be sourced from a country of origin which is party to the Paris Agreement, and which has submitted a Nationally Determined Contribution to the United Nations Framework Convention on Climate Change (UNFCCC) covering carbon emissions and removals from agriculture, forestry and land use which ensure the changes in carbon stock associated with biomass harvest are counted towards the country's commitment to reduce or limit greenhouse gas emissions, or Route B Feedstock may be sourced from a country of origin which is party to the Paris Agreement and has national or sub-national laws in place (developed in accordance with Article 5 of the Paris Agreement and applicable in the area of harvest), to conserve and enhance carbon stocks and sinks, and provided there is evidence that reported LULUCF-sector emissions do not exceed removals, or Route C Feedstock may be sourced from a Supply Base where an assessment demonstrates that both the carbon stock is stable, and the forests' capacity to act as a carbon sink is stable or increasing over the long term.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	**Indicator**
3.2.1	All feedstock sourcing shall be consistent with either of these two options: Option A. Feedstock may be sourced from Supply Bases where an assessment of the Supply Base shows that the forest carbon stocks are stable or increasing, or Option B. Feedstock may be sourced, if the assessment shows that the forest carbon stocks are declining in the Supply Base, provided that the decline is due to natural processes (fire, pests etc.), and sourcing of feedstock has the aim to recover feedstock that would otherwise be lost or to assist regeneration.

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

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	**Indicator**
3.2.2	Primary feedstock shall not be sourced from forest areas where site productivity is low and, according to local definitions or norms, the areas are classified as low-productive or difficult to regenerate.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	**Indicator**
3.2.3	feedstock shall not be sourced from forest areas in the Supply Base which, according to local definitions or norms, are classified as having combined attributes of high carbon stocks and high conservation value (HCV).
Supply Base Verifiers	Same risk mitigation activities apply as described in SBP section 3 "Risk management measures", indicator 3.2.3.
Risk Rating justification	Forest land risk rating is used. See the justification under 1.1.1.
Risk Rating	Specified Risk

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	**Indicator**
3.3.1	Feedstock sourcing shall be in compliance with the principles of cascading use, high quality stem wood shall not be used as feedstock if it is in substantial demand for long-lived products in the Supply Base.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	**Indicator**
4.1.1	Freedom of association and the right to collective bargaining shall be respected in the workplace.

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

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	**Indicator**
4.1.2	Forced or compulsory labour shall not be used.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	**Indicator**
4.1.3	Child labour shall not be used.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	**Indicator**
4.1.4	Workers shall not be discriminated in hiring, remuneration, access to training, promotion, termination or retirement.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	**Indicator**
4.1.5	Wages paid to workers shall meet or exceed the legal minimum wage or where there is no statutory minimum wage industry norms shall be met or exceeded
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	Indicator
4.1.6	Working hours shall comply with legal requirements.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	Indicator
4.1.7	Workers shall have access to health care provisions, sickness benefits, retirement benefits, invalidity benefits, death benefits, and workers' compensation
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	Indicator
4.1.8	Training shall be provided for all workers to allow them to implement the conditions set out in all elements of the SBP Standards relevant to their responsibilities.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	Indicator
4.1.9	Mechanisms shall be in place for resolving grievances and disputes in the workplace.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	Indicator
4.1.10	Safeguards shall be put in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures.

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

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	**Indicator**
4.2.1	Negative social and community impacts shall be identified and avoided.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	**Indicator**
4.2.2	Feedstock sourcing shall positively contribute to the local economy, including employment.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	**Indicator**
4.2.3	Food, water supply or high conservation values (HCV) that are essential for the fulfilment of basic needs of communities shall be maintained or enhanced
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	**Indicator**
4.2.4	Legal, customary, and traditional tenure and use rights of Indigenous Peoples and local communities related to the Supply Base shall be identified, documented, and respected.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	Indicator
4.2.5	Mechanisms shall be in place for resolving grievances and disputes relating to tenure and use rights of the forest and other land management practices.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	Indicator
4.2.6	Where Indigenous Peoples' rights are identified in the Supply Base, and Free Prior and Informed Consent (FPIC) has not been achieved for the proposed and planned activities, a consultation and, if required, accommodation process shall be put in place.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Eesti islands Hiiumaa & Saaremaa & Eesti counties	Indicator
4.2.7	Designated cultural heritage sites shall be preserved.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Annex 2: EU RED Supply Base Evaluation

Countries where EU RED Supply Base Evaluation is used	
Country	Estonia
Area	Eesti islands Hiiumaa & Saaremaa & Eesti counties
Sustainable harvesting criteria 29(6)	
(i) The legality of harvesting operations	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-EU-EE-FOR_v1.0 REDIII Level A for Estonia FOR
Level B management system at the level of the forest sourcing area	N/A
(ii) Forest regeneration of harvested areas	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-EU-EE-FOR_v1.0 REDIII Level A for Estonia FOR
Level B management system at the level of the forest sourcing area	N/A
(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grasslands, heathland and peatlands, are protected with the aim of preserving biodiversity and preventing habitat destruction, unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Same risk mitigation activities are used as mentioned in SBR for mitigation risks related to indicators 2.1.1 and 2.1.2 and 2.1.3 of SBP Reverse Regional Risk Assessment for Estonia v2,0 Peatlands - HMPK vertifies each load (in forest stock and from databases) and ensures that the material is not originating from peat mining areas, where woody biomass is removed in order to drain the area for peat mining purposes.
(iv) that harvesting is carried out considering the maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth forests as defined in the	

country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located, and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with requirements to use logging systems that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and habitats	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	a) HMPK does not use roots and stumps in their production. It is not common practice to remove roots and stumps during forest management activities but if such material is offered - then it is not accepted for biomass production b) HMPK does not source material from forests that could be defined as primary or old growth forets In Estonia for OFG and primary forests are expected to be found within Woodland Key Habitats (WKHs), Natura2000 sites and other protected forests -so same risk mitigation activities apply as mentioned in SBR for mitigation of risks related to indications 2.1.1 and 2.1.2 and 2.1.3 of "SBP Revised Regional Risk Assessment for Estonia v2,0" c) incase biologically valuable deadwood exist - HMPK leaves it as minimum 5m3 per hectare. This is a minimum threshold for biodiversity trees from the Forest Act and could be used for deadwood as well until different amount is agreed oncountry level.
(v) That harvesting maintains or improves the long-term production capacity of the forest.	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-EU-EE-FOR_v1.0 REDIII Level A for Estonia FOR
Level B management system at the level of the forest sourcing area	N/A
(vi)[1] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. *Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:* *(a) **primary forest** and other wooded land and **old growth forest,** namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located. If there is no definition of **old growth forest** at the national level, then the following definition shall apply: A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.*	
Type of Risk Assessment used	☒Level A – proof at national or sub-national level

	☐Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-EU-EE-FOR_v1.0 REDIII Level A for Estonia FOR
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. *Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:* *(b) **highly biodiverse forest** and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.*	
Type of Risk Assessment used	☐Level A – proof at national or sub-national level ☒Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	<u>Specific risk description</u>: risk is related sourcing material from highly biodiverse forest , especially from WKHs and Natura2000 forest habitats. <u>HMPK activities: </u> Same risk mitigation activities are used as mentioned in SBR for mitigation of related to indication 2.1.1 and 2.1.2 and 2.1.3 "SBP Revised Regional Risk Assessment for Estonia v2.0"
(vi)[3] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. *Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:* *(d) **highly biodiverse grassland** spanning more than one hectare that is: (i) natural, namely grassland that would remain grassland in the absence of human intervention and that maintains the natural species composition and ecological characteristics and processes; or (ii) non-natural, namely grassland that would cease to be grassland in the absence of human intervention and that is species-rich and not degraded and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the harvesting of the raw material is necessary to preserve its status as highly biodiverse grassland.*	
Type of Risk Assessment used	☒Level A – proof at national or sub-national level ☐Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-EU-EE-FOR_v1.0 REDIII Level A for Estonia FOR
Level B management system at the level of the forest sourcing area	N/A
(vi)[4] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. *Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land*	

with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status: *(e)* ***heathland*** *- Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).*	
Type of Risk Assessment used	☒Level A – proof at national or sub-national level ☐Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-EU-EE-FOR_v1.0 REDIII Level A for Estonia FOR
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	SBP-RED-EU-EE-FOR_v1.0 REDIII Level A for Estonia FOR
Level B management system at the level of the forest sourcing area	N/A
(vi)[6] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. *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.*	
Type of Risk Assessment used	☐Level A – proof at national or sub-national level ☒Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	<u>Specific Risk description:</u> risk is related to sourcing biomass from undrained **peatlands** <u>HMPK activities</u>: HMPK vertifies each load (in forest stock and from databases) and ensures that the material is not originating from peat minimg areas, where woody biomass is removed in order to drain the area for peat mining.

(vii) that installations producing biomass fuels from forest biomass, issue a statement of assurance, underpinned by company-level internal processes, for the purpose of the audits conducted pursuant to Article 30(3), that the forest biomass is not sourced from the lands referred to in point (vi).	
Type of Risk Assessment used	☒Level A – proof at national or sub-national level ☐Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	*Not applicable, requirement only applies to Level A*

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

Annex 2a: EU RED II Supply Base Evaluation

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

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

Verification and monitoring of suppliers

N/A

Feedstock inspection and classification upon receipt

N/A

Supplier audit for processing residues and post-consumer feedstock

N/A

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

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

Country: Estonia - Eesti islands Hiiumaa & Saaremaa & Eesti counties

Not Applicable - only urban and landscape feedstock is used

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

NOTE: For "Trees outside forests (TOF) – Urban and landscape feedstock" no REDII sustainability requirements apply, only the GHG savings criteria apply (SBP REDII Bridging ID Section 4.2). The land use category in this case is neither forest land nor agricultural land. For "Trees outside forests (TOF) – Agricultural land feedstock" the applicable criteria are Article 29 paragraphs (2)-(5).