



Compliance with the SBP Framework: Public Summary Report

Preferred by Nature OÜ
Evaluation of Warmeston SIA

Fourth Surveillance Audit

Sustainable Biomass Program
sbp-cert.org





Completed in accordance with the CB Public Summary Report Template Version 2.1 and SBP Bridging Requirements for Meeting the Directive EU/2023/2413 (REDIII)

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

Document history

Version 2.0	Published 10 August 2023
Version 2.1	Published 21 May 2025

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1 Overview

Certification Body (CB) Name:	Preferred by Nature OÜ
Primary CB contact for SBP:	Pilar Gorria Serrano
Primary CB contact email:	pgorria@preferredbynature.org
Audit team leader:	Liene Suveizda
Audit team members:	ERROR: Works only for SBR or PSR form. Please alter the function by adding more tables, or by dynamic sql
Name of the Company:	Warmeston SIA
Company legal address:	"Granulas", LV-3851 Saldus nov., Cieceres pag., Latvia
Company contact for SBP:	Viljo Aros
Company contact email:	viljo.aros@warmeston.ee
Company website:	
Date of installation:	25 Jan 2026
SBP Certificate Code:	SBP-01-70
Date of certificate issue:	30 Mar 2022
Date of certificate expiry:	29 Mar 2027
Audit closing meeting date:	06 Feb 2026
Audit cycle:	Fourth Surveillance Audit

2 Audit conclusions

2.1 Certification decision

Based on the auditor's recommendation and the Certification Body's technical review, the following certification decision is taken:	
Certification decision:	Certification approved
Certification decision by (name of the person):	Mikhail Rai
Date of decision:	10 Apr 2026
Other comments:	N/A

2.2 Open non-conformities and observations

NC number 8412 copied from 4685	NC Grading: Observation
Standard:	SBP Standard 2: Feedstock Verification v2.0
Requirement:	2.1 The Organisation shall ensure that all sourced feedstock can be traced back to the defined Supply Base. To do so, the Organisation shall ensure that the sourcing area is within the defined Supply Base. N/A N/A N/A
Description of Non-conformance and Related Evidence:	
The BP has defined that Supply Base for primary feedstock and processing residues is Republic of Latvia. The Organisation demonstrated during audit that all primary feedstock originates from Latvia which is the defined Supply Base. As to feedstock sourcing region Latvia, the BP is using information on the place of harvesting in delivery notes and Felling Permits. As for the processing residues feedstock, the Supply Base includes Latvia. According to documented SBP procedures and interviews of the responsible staff the BP requests a declaration of origin from suppliers at least once per 12 months. When adding a new type of feedstock to an active supplier the Feedstock Origin Declaration is updated as needed. The organisation assesses the need for supplier audits on a case-by-case basis. However, there is no clearly defined process or verification mechanism to confirm the accuracy of the information provided in the supplier declarations. An Observation OBS 2025-002311 raised.	
Timeline for Conformance:	N/A
Evidence Provided by Company to close NC:	N/A
Findings for Evaluation of Evidence:	N/A
NC Status:	Open

NC number 8732	NC Grading: Observation
Standard:	Instruction Document 5E: Collection and Communication of Energy and Carbon data. v2.1
Requirement:	3.8.5 If a CHP operated is used then input fossil and biomass fuels must be reported in

	section 3.3 and / or 3.4 of the SAR and the following information recorded in Table 3.5.4 of the SAR, validated by the CB: Fuel use – Total fuel input quantity (unit = t, m3 or litre) – Weighted average lower heating value of total fuel input, as received on wet basis (unit = MJ/t, MJ/m3 or MJ/litre) – Total fuel input = (1)x(2)/3.6 in kWh. – Electricity use – net electricity used on site of BP for biomass production as copy / pasted from 3.2 under 'CHP plant' – net electricity used on site of BP but not for biomass production – other net electricity generated by CHP that is not used on site of BP and is not self-consumption by CHP – Total net electricity from CHP = (4)+(5)+(6), excluding self-consumption by CHP, in kWh. – Heat use – Reference temperature of heat at the point of use (if measured) – net heat used on site of BP for biomass production in kWh – net heat used on site of BP but not for biomass production in kWh – other net heat used by any other party in kWh – total net heat used from CHP = (9)+(10)+(11) in kWh – Total net CHP yield = ((7)+(12))/(3) N/A N/A N/A
Description of Non-conformance and Related Evidence:	
During the audit it was identified that CH is using heat supplied by the neighboring CHP managed by the other legal entity. Input data is supplied by the CHP manager and also data coming Warmeston SIA incoming invoices for heat and electricity. During the audit it was identified that value of the CHP yield for the CHP is above the reference value. Since the CHP is managed by third party the is formulated. The Organization shall ensure accurate and up to date information is provided by the external party for CHP yield calculation.	
Timeline for Conformance:	N/A
Evidence Provided by Company to close NC:	N/A
Findings for Evaluation of Evidence:	N/A
NC Status:	Open

NC number 8734	NC Grading: Observation
Standard:	Instruction Document 5E: Collection and Communication of Energy and Carbon data. v2.1
Requirement:	3.8.5 If a CHP operated is used then input fossil and biomass fuels must be reported in section 3.3 and / or 3.4 of the SAR and the following information recorded in Table 3.5.4 of the SAR, validated by the CB: Fuel use – Total fuel input quantity (unit = t, m3 or litre) – Weighted average lower heating value of total fuel input, as received on wet basis (unit = MJ/t, MJ/m3 or MJ/litre) – Total fuel input = (1)x(2)/3.6 in kWh. – Electricity use – net electricity used on site of BP for biomass production as copy / pasted from 3.2 under 'CHP plant' – net electricity used on site of BP but not for biomass production – other net electricity generated by CHP that is not used on site of BP and is not self-consumption by CHP – Total net electricity from CHP = (4)+(5)+(6), excluding self-consumption by CHP, in kWh. – Heat use – Reference temperature of heat at the point of use (if measured) – net heat used on site of BP for biomass production in kWh – net heat used on site of BP but not for biomass production in kWh – other net heat used by any other party in kWh – total net heat used from CHP = (9)+(10)+(11) in kWh – Total net CHP yield = ((7)+(12))/(3) N/A N/A N/A
Description of Non-conformance and Related Evidence:	

During the audit it was identified that CH is using heat supplied by the neighboring CHP managed by the other legal entity. Input data is supplied by the CHP manager and also data coming Warmeston SIA incoming invoices for heat and electricity. During the audit it was identified that value of the CHP yield for the CHP is above the reference value. Since the CHP is managed by third party the Observation is raised. The Organization shall ensure accurate and up to date information is provided by the external party for CHP yield calculation.

Timeline for Conformance:	N/A
Evidence Provided by Company to close NC:	N/A
Findings for Evaluation of Evidence:	N/A
NC Status:	Open

2.2 Closed non-conformities

NC number 8494		NC Grading: Major
Standard:	SBP Standard 2: Feedstock Verification v2.0	
Requirement:	7.1 The Organisation shall develop a Risk Management Plan (RMP) which includes Risk Management Measures (RMMs) for each Indicator rated as specified risk within its SBE per the Organisation's Risk Assessment or an SBP-endorsed RRA with the objective to mitigate the risk and reduce the risk rating to low risk. N/A N/A	
Description of Non-conformance and Related Evidence:		
The organization has developed a Risk Management Plan (RMP) that outlines measures for mitigating risks associated with indicators designated as “specified risk.” The RMP includes Risk Management Measures (RMMs) for each indicator rated as specified risk within its Supply Base Evaluation (SBE), as per the SBP-endorsed Risk Assessment (RRA). The objective of these measures is to mitigate risks and reduce their rating to low. The Biomass Producer (BP) uses the EWay system—synchronized with the Nature Data Management System “Ozols,” LVM GEO, VMD GIS, and other sources—as its primary tool for identifying High Conservation Value (HCV) attributes in order to mitigate risks for Indicators 2.1.1, 2.1.2, 2.1.3 and 3.2.3. The auditors verified primary feedstock data for a two-month period of SBP-compliant feedstock by comparing the BP’s records with data from the “Ozols” system for protected species (HCV1), protected habitats (HCV3), and other HCV values. This review identified three Forest Management Units (FMUs) containing HCV1 attributes. Harvesting permits for final felling had been issued for these sites. The auditors visited the three FMUs during field inspections. The inspections revealed that two forest compartments had been harvested through final felling (clear-cutting). FMU: Valsts mežs Vaiņode, Cadastral No. 64920040102, Block 351, Compartment 6 A final felling permit had been issued for Compartment 6. The field inspection confirmed that final felling had taken place. The potential nesting site of the black woodpecker (<i>Dryocopus martius</i>) was destroyed. FMU: “Zariņi”, Cadastral No. 98740060089, Block 1, Compartment 3 The field visit confirmed that final felling had been carried out. Several large trees were left as retention trees within the compartment, and retention trees were preserved within the registered nesting site area. No evidence of a large bird nest was observed. According to information from the State Forest Service, the area had been inspected prior to harvesting and no white stork (<i>Ciconia ciconia</i>) nest was present. In both cases, the feedstock was delivered as SBP-compliant. Because high-risk feedstock entered the SBP-compliant supply chain, Major NCR 2026-00286201 was raised. See Exhibit 10 for field visit documentation and materials related to the NCR.		
Timeline for Conformance:	3 months from the report finalisation	
Evidence Provided by Company to close NC:	Root cause analyses. Corrective actions - communication with system developer, data base Eeway update. Mass balance account update. Sample FMUs demonstrated.	
Findings for Evaluation of Evidence:	The BP has provided a root cause analysis. According to the information submitted, the issue was caused by a technical error. The EWay system developer reported that in 2025 an incident occurred during a data update, resulting in a synchronization error between Ozols, LVM GEO, and EWay. The issue has since been identified, and corrective measures have been implemented to prevent similar incidents in the future. These measures include the introduction of data time stamps and regular verification of script logs, including success/failure reporting. The EWay system administrator confirmed that work on improving the long-term stability and reliability of data exchange is ongoing in cooperation with the relevant parties. As an additional corrective action, the BP has removed the affected volumes from the SBP-compliant mass balance accounts. The BP has provided information to the auditors confirming that the updates in the EWay system have been implemented. The updates were demonstrated using two FMU	

	samples. Based on the information provided by the BP, the non-conformity can be considered resolved.
NC Status:	Closed

2.3 Actions taken by Organisation Prior to Report Finalisation

None

2.4 Notes for the next Audit

None.

3 Scope of the audit and SBP certificate

Scope item	Check all that apply to the Certificate scope
Primary activity	Biomass Producer
Secondary activity	Trader
Approved Standards	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 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; Instruction Document 1A: SBP Requirements for Primary Feedstock from Trees Outside Forests (TOF) v1.0
Product Group IDs	☒ Forest feedstock (1A) ☒ Trees outside forest (TOF) - Urban and landscape feedstock (2A) ☐ Trees outside forest (TOF) - Agricultural land feedstock (3A) ☒ Processing residues feedstock (4A) ☐ Post-consumer feedstock (5A) ☐ Other (please specify)
SBP Feedstock types	☒ SBP Compliant; ☒ SBP Controlled
Includes Supply Base Evaluation (SBE)	No
Includes EU RED Scheme	Yes
Includes EU RED Supply Base Evaluation (SBE)	Yes
Products	WB 1.1 Wood pellets, WB 2.1 Wood chips
Feedstock origin (countries):	Latvia, Lithuania, Norway, Sweden
SBP-endorsed Regional Risk Assessments used: Public link: https://sbp-cert.org/documents/standards-documents/risk-assessments/	SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed
Chain of custody system	☒ Physical separation ☒ Mass balance
Outsourcing	No
Changes in the scope	Adding to scope TOF 2A category.

3.1 Description of the company

Guidance: Please describe the type, structure and operations of the company including its role in the supply chain, its inputs and outputs as they related to SBP Standards.

SIA "Warmeston" is a biomass - wood pellet producer with a production site and office located in Broceni parish. A temporary storage sites are situated in the Liepāja port and Liepāja city (14. novembra bulvāris 19A, Liepāja). The factory started production of wood pellets in November 2016. In 2020, the organisation changed the name from SIA "Pellet4Energia" to SIA "Enefit Green". Starting from 2024, the biomass producer was acquired by Warmeston OU group. The organisation is producing both premium and industrial quality pellets. For pellet production, the BP is sourcing primary and processing residues feedstock. There is a CHP plant, belonging to another company, which is situated at the same address. The CPH is operated by a separate legal entity. Feedstock used for energy generation at the CHP (wood chips) is not included in the scope of the SBP certificate. All feedstock types are delivered to the pellet plant using road transport (trucks). All input material delivered to the pellet production plant is either FSC, PEFC certified or included in the SBE system. After the production, pellets are transported to the harbour temporary storage places in Liepāja by trucks.

3.2 Site details

Legal entity name	Address	Site Activity	Visited during the audit
Brocēni production site	Granulas, Cieceres, Saldus, LV-3851, Latvia	pellet production	☒
Logistic site Liepāja	14. novembra bulvāris 19A, Liepāja, LV-3414	Temporary storage of pellets	☒
SIA Eikers Stivisors, Liepāja port	Brīvostas iela 22, Liepāja, LV-3405	Temporary storage of pellets	☒

3.3 Detailed description of the Chain of Custody system and Product Groups

Guidance: Please describe the operation of the CoC system including details of the mass balance management and a list of established Product Groups.

Warmeston OÜ (including the Warmeston SIA Brocēni production unit) holds a valid FSC CoC certificate since the 3rd of February 2015, the certificate code is PBN-COC-024339 and a PEFC CoC certificate No. PBN-PEFC-COC-024339 also covers the PEFC Controlled Sources part from 07.06.2018. FSC Controlled Wood standard included in the certificate scope. Trading of chips that were added to their scope during the audit in 2025. Not applied so far. The BP has implemented a risk mitigation plan within SBE for the primary feedstock. The company has elaborated and enforced procedures and system updates that the BP would source only FSC/PEFC-certified or FSC/PEFC Controlled processing residues (including fuel for feedstock drying). Also, the BP implements supplier audits for secondary feedstock (PEFC system). The product groups for the FSC CoC certification include fuel wood (W1.2), wood chips (W3.1), sawdust (W3.2), wood shavings (W3.3), wood pellets (W3.6), sawdust briquettes (W3.7); offcuts (W19) and bark (N1). The PEFC CoC system has the following product groups in scope: 010300 – chips and particles, 020100 - Fuelwood and 020300 - Pellets and briquettes. Also they implement supplier audits for secondary and tertiary feedstock. All suppliers are verified before initial purchase. Feedstock from uncertified companies is only sourced if "low risk" and/or specified risks are mitigated under the company's biomass sourcing due diligence systems, which includes information gathering (inc. information of origin), risk assessments, and mitigation of specified risks if applicable. For material accounting, the Mass Balance chain of custody method is applied. Following product groups are used: 1A (forest feedstock), TOF 2A and 4A (processing residues). Feedstock may be accepted in the form of wood chips, sawdust, shavings or roundwood. The Mass Balance system covers SBP and EU REDIII requirements and enables tracing of claims and quantities. All SBP transactions are registered in the DTS. Feedstock is segregated in the storage area only when the origin cannot be confirmed with the document

check. Feedstock will be segregated until it is possible to verify the origin. If the origin cannot be verified then the material is not accepted. The entire supply chain is fully traceable, and each shipment must be accompanied by an electronic waybill containing the following information: cadastral number, tree species, supplier name, assortment, quantity, certificate statement, and code, along with the distance from the delivery location. The information on the waybill is automatically verified before the material is accepted at the gate. If this information is absent, the cargo will not be processed until all necessary data is provided. Feedstock category TOF 2A added to the scope during audit. Trading of wood chips included in the scope of BP. Not applied so far. Physical separation method foreseen for trading products without physical possession.

4 Specific objective of the audit

The specific objective of this evaluation is to confirm that the Biomass Producer's management system is capable of ensuring that all requirements of the specified SBP Standards added to the scope of organization's SBP certificate: primarily - TOF (2A from landscape, urban and infrastructure).

SBP Instruction Document EU RED: Bridging Requirements for Meeting the Renewable Energy Directive (EU/2023/2413) are implemented across the entire scope of certification. Evaluation of the practical implementation of the requirements of the applicable standards:

- Review of the BP's management procedures, primarily covering the requirements of SBP RED Bridging Requirements.
- Review of the BP's management procedures, including requirements designated in SBP standard SBP Standard #1 V2.0; SBP Standard #2 V2.0; SBP Standard #4 V2.0.
- Interviews with responsible staff.
- Review of the records, calculations, and conversion factors.
- Assessing compliance against SBP Standard #5 and accompanying Instruction Document 5E - specifically related to RED requirements.
- Review of the reports and records, including DTS system information.
- Review of the updated Supply Base Report.
- Evaluation of RED system.
- Field visits of FMU to evaluate the implementation of risk mitigation measures.

5 Evaluation process

5.1 Timing and duration of evaluation activities

Audit Level of Effort (LoE)		
Activity	Auditors	Auditor hours
1. Preparation	LS, AM	2.0
2. On-site (excl. travel time)	LS, AM	31.0
3. Report writing	LS, AM	12.0

5.2 Auditor team qualification

Auditor qualification		
Auditor name	Role	Qualification
Liene Suveizda	Lead auditor	Joined NEPCon Latvia in 2016. M.Sc in biology, forest ecology. Graduated from University of Latvia. Liene has also studied law and hold the 2nd level higher education in law, Business School "Turība". Liene has long term experience in forestry sector in Latvia. Liene has passed the NEPCon lead assessor training course in FSC Forest Management and FSC Chain of Custody operations and obtained the FSC lead auditor qualification. Liene has participated as an auditor in training is several SBP assessment and scope change (SBE) audits in Latvia. She has obtained the SBP auditor qualification.
Agnese Mickeviča	Team member	NEPCon SIA kopš 2018. gada. Ieguvusi bakalaura grādu mežzinātnē Latvijas lauksaimniecības universitātē un maģistra grādu Vides zinātnē Rīgas tehniskajā universitātē. Pieredze darbā Valsts meža dienestā. Apstiprinātā par NEPCon FSC preču zīmju aģentu. Ar 2019. gada janvāri ieguvusi FSC un PEFC piegādes ķēdes auditora kvalifikāciju, 2025. gadā: SBP auditora kvalifikāciju.

5.3 Description of evaluation activities

The annual surveillance audit was carried out as an on-site audit.

The opening meeting at the Warmeston group level (all pellets mills) was conducted remotely on January 26. The opening meeting was attended by the certification body auditor team - SBP lead auditor and team members of PbN Estonia and the SBP auditor team of PbN Latvia. The responsible personnel of the organization – the Quality and Environmental manager and the Compliance Manager of the Warmeston HQ (Headquarters) attended the meeting. During the opening meeting the audit team leader for the Warmeston group audit introduced the auditing team, provided information about the audit plan, methodology, auditor qualification, rules, confidentiality issues, and audit methodology, and clarified the verification scope. The lead auditor explained the aim and objectives of the audit, informed about the evaluation process, underlined the essence of a few important practicalities such as the need to collect objective evidence through a combination of document review, site visits, interviews, and discussions, explained the essence and importance of sampling aspect of the auditing. Explained the process of

issuing nonconformity reports (NCRs) and their grading. It was underlined that NCRs are expected in the audit process and are designed to help the organization strengthen its procedures and processes. Discussed and confirmed the audit itinerary, based on the audit plan that was provided to the organization before the audit. After the meeting auditors selected the FMUs for field inspections and suppliers of processing residues for audits. Suppliers of primary feedstock have been selected for field inspections based on the sampling based on the information (feedstock origin data) provided by the Quality and Environment responsible.

January 27, 2026

Audit to Warmeston SIA pellet mill in Brocēni was conducted. The audit was conducted as an onsite audit. After a brief opening meeting, attended by the Quality and Environmental manager, the Compliance Specialist from Warmeston HQ, and local plant personnel - the Production Manager, the Production Director and the Procurement Manager. After formal introduction of and discussion of details of the audit agenda, the responsible person informed about changes in the SBP/SBE management system and production processes.

Further, as part of the office audit, one auditor went through all applicable requirements of the SBP standards Nr. 1 and Nr. 2, and instruction documents covering the SBE system regarding sourcing of both primary and secondary feedstock (processing residues), including requirements designated in the SBP Framework Instruction Document RED: Bridging requirements of the SBP scheme for meeting RED and the overall BP management system. During the process overall responsible person for the SBP system and over responsible staff (responsible person – Procurement Manager, Compliance Manager and Environmental and Quality Manager) having key responsibilities within the system were interviewed. Further on the auditor evaluated the SBP (SBE) system – effectiveness, monitoring, supplier review, evaluation of suppliers, and risk mitigation measures. Documented procedures for primary feedstock supplies with the SBE system were evaluated and discussed with responsible staff at the BP. Auditors also reviewed roundwood sourcing documentation and checked the risk mitigation measure records, interviewed responsible persons. Auditor reviewed SBR and interviewed the responsible person regarding the Supply Base Report.

Another auditor went through all applicable requirements of the SBP standard No. 5 and instruction document 5E covering input clarification, the existing chain of custody and controlled wood systems, management system, CoC, recordkeeping/mass balance requirements, emission and energy data, and categorization of feedstock inputs and verification of SBP compliant and SBP Controlled feedstock/ biomass. The overall responsible person for the SBP system and other responsible staff (plant manager, production manager, office administrator, procurement manager) having key responsibilities within the system were interviewed during the process. In the second half of the day, one auditor reviewed the chain of custody system; material acceptance, and recording. Reviewed the FSC CoC Credit system, the SBP mass balance system, and updated conversion factors.

Compliance with Standard 4 and Chain of Custody implementation was reviewed focusing on the Critical Control Points, in particular, it was verified reception of the material and its classification, identification of feedstock origin, production process with the conversion factors associated, mass balance, final product storage and sales. The office/production site audit concluded with a brief meeting where the outcomes of the audit were provided to the responsible personnel of the BP.

January 28, 2026

Field inspections were planned for this day as per the audit plan and as agreed with the BP in the opening meeting. Two auditors from Latvian PbN team conducted field visits to both suppliers of primary feedstock and secondary feedstock (processing residues) to verify the implementation of risk mitigation measures related to risks identified by the SBP regional risk assessment for Latvia. See details of visited sites and sampling approach in relevant sections of the Public Summary report below.

February 6, 2026

The audit was concluded with a closing meeting that was held remotely on the February 6. The closing meeting was attended by the responsible personnel from Warmeston HQ - the Quality and Environmental Manager, the Compliance specialist, and PbN Estonian and Latvian auditor teams.

The Lead Auditor provided a brief summary of audit activities, a short summary of field inspections, and the outcomes of field inspections. Furthermore, the overall audit findings were summarised, and audit conclusions based on the 3 angle evaluation method were provided.

5.4 List of forest management units and feedstock suppliers visited

☐ N/A – No forest sites or suppliers visited during this evaluation

Site name
FMU Meža pētīšanas stacija
Site location
Cad. No. MPS 46250020026 block No. 55, comp. No. 10&14
Site description
Potential nesting site of black woodpecker (<i>Dryocopus martius</i>) registered in comp. No14 in IS "Ozols".
Rationale and focus of visit
The harvesting license for final felling issued for comp. No. 10. The potential nesting site located close to border of comp. No. 10.
Description of audit activity
The field visit revealed that the logging hasn't been carried out during on-site audit in comp. No. 10 and 14. The potential nesting site of <i>Dryocopus martius</i> has been preserved.

Site name
FMU Valsts mežs Vaiņode
Site location
Cad. No. 64920040102, block No. 351, comp. No. 6
Site description
The potential nesting site for black woodpecker <i>Dryocopus martius</i> registered in IS "Ozols" in comp. No. 6
Rationale and focus of visit
Harvesting license for final felling issued for comp. No. 6.
Description of audit activity
The field inspection revealed that the compartment No. 6 has been logged in final felling. The potential nesting site of black woodpecker destroyed.

Site name
FMU Zariņi

Site location
Cad. no. 98740060089, block No. 1, comp. No. 3.
Site description
Nesting site of white stork (<i>Ciconia ciconia</i>) registered in comp. No.3. Data from 2016.
Rationale and focus of visit
The harvesting license issued for comp. No. 3 for final felling. Feedstock delivered as SBP compliant feedstock.
Description of audit activity
Field visit revealed that final felling has carried out. Large dimension trees left as retention trees in the compartment. The retention trees preserved in in area of registered nesting site. No signs of large bird nest observed. According information provided from State Forest Service the harvesting area checked before final felling and no presence of white stork nest observed.

Site name
FMU "Jaunkroģeļi"
Site location
Cadaster number 84250050228
Site description
Land cadaster usage - "shrubland" and "other land use".
Rationale and focus of visit
Compliance verification with TOF 2A category feedstock.
Description of audit activity
The field visit reveal that FMU is non-forest land and is overgrown with trees and shrub species in small size groups. The feedstock corresponds to TOF 2A classification.

Site name
LSEZ SIA Ekers Stividoris LP
Site location
Brīvostas iela 22, Liepāja
Site description
Temporary storage site for pellets
Rationale and focus of visit
Temporary storage site for pellets
Description of audit activity
Interviewed: Igors Nikolajevs. At the time of the inspection, the warehouse contained 4,800 tonnes of pellets. Material can be delivered between 08:00 and 19:30 at any time (all information is communicated through the system), and all loads enter via the scales.

Site name

Mežmaļi SIA
Site location
Kuldīgas nov., Pelču pag., "Aizmeži", LV-3322
Site description
Secondary feedstock supplier
Rationale and focus of visit
To verify that the supplied material meets the definition of secondary material.
Description of audit activity
Onsite visit to a supplier. Interview with the supplier's representative. Review of logs procurement records and delivery notes. Site tour to the production facility. As from interviews with the responsible personnel and supplier audit records, auditor confirms that feedstock received is residue from wood primary processing operation. Auditors verified the consistency of the volumes delivered to the BP, main operation and no incentives to produce residues. The supplier had been audited by the certification body in past several months. Findings in the BP supplier audit records do not contradict the information at the disposal of the certification body

Site name
Latberg SIA
Site location
Raiņa iela 28A, Skrunda, Kuldīgas novads, LV-3326
Site description
Secondary feedstock supplier
Rationale and focus of visit
To verify that the supplied material meets the definition of secondary material.
Description of audit activity
Onsite visit to a sawmill. Interview with the supplier's responsible personnel, member of the board. Review of logs procurement records and delivery notes. Site tour to the production facility. As from interview and supplier audit records, auditor confirms that feedstock received is residue from wood primary processing operation. Auditors verified the consistency of the volume of processing residues delivered to the BP, main operation and no incentives to produce residues. Auditors confirm consistency of the volume delivered and no incentives to produce residues.

5.5 Describe audit sampling methodology used

The supplier sampling approach and process The following considerations have been taken into account to determine the sample size and the intensity: 1) Geographical area; 2) Type of the operations and activities; 3) Risk mitigation measures related to feedstock origin Geographical area: The BP primarily sources the primary feedstock within the Supply Base Evaluation process from the Latvia - Kurzeme region. Accordingly, one geographical area within the SBE is considered and FMUs located in the Kurzeme region, Latvia shall be included in the sample; Type of operations and activities: The SBE covers the sourcing of primary feedstock (roundwood), which is mainly from forest land. During the audit period, the BP had not been sourcing arboricultural arisings from non-forest land. Risks related to feedstock origin according to the SBP Regional Risk Assessment: Regarding the origin of Latvia, the following risks are considered as specified in the Regional Risk Assessment for Latvia (v.2.0) endorsed by the SBP: 2.1.1. Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified. 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. 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. 3.2.3. Primary 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). Field inspections are planned to verify the BP's risk mitigation measures related to preserving High Conservation Values. The intensity of sampling for field inspections Auditors carried out a desk-based evaluation of the feedstock origin data for risks outlined in the RRA Latvia. For this purpose, 2-month procurement data were sampled and evaluated. All feedstock origin data for 2 months have been checked for HCV presence using desk tools. Those FMUs containing HCV attributes (compartments of HCV in the felling permit) have been selected for pool for field inspections. This approach in the auditor's opinion is efficient and sensible by selecting only those FMUs/compartments that have some reason to inspect in nature. It is considered sufficient to cover all major risk aspects and provide a sufficient level of assurance for compliance with the standard. Auditors checked the pool of origin data and selected sites for field inspections in the Kurzeme region. A pool of primary feedstock origin data for 2 months was verified using the database "Ozols" for presence of HCV values of categories 1 and 3. Four (4) FMUs with HCV1 category attributes in the pool identified. As the BP has declared that there is no primary feedstock sourced from high risk sites and consequently the BP hasn't carried out any field visits related to risk mitigation measures, the auditors took the decision to verify the 3 FMUs to evaluate the effectiveness of RMM. 3 sites selected are related to HCV cat. 1. Formula $0,6 \times \sqrt{n}$. from 4 FMUs = 1,2 = 2 FMUs used to calculate the minimum number of FMUs to visit. One FMU selected to verify the compliance for sourcing from TOF 2A feedstock category. All together 4 FMUs selected for field visits. The BP is sourcing RED compliant processing residues from 12 suppliers - sawmills, brokers/traders, 1 veneer producer and 1 stake producer. 2 suppliers were selected for on-site supplier audits - one sawmill (wood chips for heating, wet sawdust) and 1 stake producer (Skinless hake (wet)). The sawmill was selected for a second consecutive year of on-site re-visit as a high-risk supplier because it uses a method of separating high- and low-risk raw materials. For 4 processing residue suppliers auditors reviewed delivery documentation and records in the BP's office. The largest supplier of processing residues has been included in the sample for the second year in a row. The documents related to SBP Standards 4 and 5 were sampled using a general.

5.6 CB stakeholder engagement

☐ N/A – Certification Body stakeholder consultation not applicable for this evaluation

Guidance: Please specify the number and types of stakeholders engaged, method of engagement and its outcomes.

The stakeholder consultation process related to Warmeston OÜ's SBE and risk mitigation plan for Latvia was undertaken before the audit from September 9 till October 9.

The BP conducted a stakeholder consultation to receive comments prior to the Warmeston SIA production site in Brocēni SBP scope change audit. The stakeholder consultation included Warmeston OÜ Sauga site, Warmeston OÜ Purila site and Warmeston OÜ Järvere site and Broceni site (in Latvia) since all companies have common ownership and evaluations were planned in similar timeline.

5.7 Stakeholder feedback and response

☐ N/A – Certification Body stakeholder consultation not applicable for this evaluation

no stakeholder feedback received.

5.8 Main strengths and weaknesses of the management system and operations

Strengths: Small number of the management staff with clearly designated responsibilities. SBE processes are well documented, selective, precautionary approach in sourcing feedstock within the SBE, main database for material balances is well maintained and all relevant information can be easily retrieved and reported. Efficient recordkeeping system.

Weaknesses: See section 10 Non-conformities and observations for details.

5.9 Summary of evaluation activities for robustness of the Supply Base Evaluation

☐ N/A – Standard 1 not in the scope of the evaluation

the BP is implementing the Supply Base Evaluation for primary feedstock (forest products) originating from Latvia and sourced without SBP-approved Forest Management Scheme claims, SBP-approved Forest Management

partial claim, and SBP-approved Chain-of-Custody (CoC) System claims. Risk mitigation measures are implemented for primary feedstock sourced from forest.

The BP is applying the SBP-endorsed regional risk assessment for the feedstock supply base covering SBE – the Republic of Latvia. Based on the “specified risks” in the risk assessment the organization has suggested mitigation measures which were consulted with relevant stakeholders prior to implementation.

Risk mitigation measures are relevant in addressing risks. It was evaluated at the time of the surveillance audit that BP has evaluated options for risk mitigation measures and selected the appropriate and effective risk mitigation measures out of those referenced in the risk assessment. In fact, the most risk mitigation measures outlined in the RRA are used by the BP. The BP is implementing mitigation measures for individual SBP standard indicators that have “specified risk” status.

5.10 Summary of evaluation activities for Processing residues and/or Post-consumer feedstock requirements per Standard 2 and EU RED

Not evaluated in the scope expansion audit. See the findings from the previous annual surveillance audit.

5.11 Summary of evaluation activities for chain of custody system per Standard 4

The chain of custody system was briefly reviewed in the context of RED Instruction Document EU RED: Bridging Requirements for Meeting the Renewable Energy Directive (EU/2023/2413). Critical control points have been evaluated during the past annual surveillance audit and the most important critical control points, such as port feedstock reception process, biomass storage sites have been visited and evaluated onsite as well. BP's documented control system has been reviewed during the past annual surveillance audit and discussed with BP's responsible personnel. BP's accounting system was reviewed and information in the CoC registers was verified. No additional activities were conducted during the scope change audit.

5.12 Summary of evaluation activities for collection and communication of data per Standard 5

The BP has established a system to record and collect GHG data. The BP made a detailed overview of the systems and databases to collect and record GHG data during the past surveillance audit. Data is collected from suppliers about the distances from where feedstock is transported. All production data is recorded in the BP ERP system, and information about fossil fuels used is based on invoices and production logs. Transportation distances from the pellet mill to ports and pellet volumes are recorded in the ERP system.

All the GHG-related information is compiled in the SAR document. All relevant evidence was provided to auditors, responsible for GHG data evaluation, auditors are considering it sufficient enough to fulfill the requirements.

5.13 Summary of audit findings for competency of involved personnel

The Quality and Environmental manager is responsible for implementing the SBP certification requirements along with SBE for all Warmeston OU pellet mills, including Brocēni pellet mill. The pellet mill personnel is implementing the supply Base Evaluation, and an independent and competent party reviewed the SBR with SBE. BP has maintained written qualification requirements for personnel involved in the SBP system, as described in the job description (internal document). Minimum qualification requirements for the central SBP system responsible staff are as follows:

- Higher education (Forestry/Environmental)
- Fluent in Latvian and English
- Minimum of 3 years of working experience in a related sector
- Experience in FSC/PEFC systems
- Experience in reporting, conducting risk assessments
- Good teamwork skills
- Familiar with relevant regulations

BP has set qualification requirements for SBP system personnel, including SBE, as described in SBP management procedures (job description). Qualification requirements cover all aspects of the qualifications

needed to implement the SBP system.

5.14 Summary of audit findings for GHG methodology per Standard 6 (if applicable)

☒ N/A – Standard 6 not in the scope

6 Detailed evaluation of BP's Supply Base Evaluation (if applicable)

□ N/A – Supply Base Evaluation not in the scope of the evaluation

6.1 Overview of BP's risk assessments and mitigation measures including EU RED scope

1. SBP Standard 1, primary feedstock (forest based, TOF 2A)

The SBP certification system includes a Supply Base Evaluation (SBE) program, which is based on a regional risk assessment and the mitigation of identified risks. Feedstock that undergoes risk mitigation measures described in the SBE program meets the requirements for SBP-certified material (SBP-Compliant).

To reduce the risk of sourcing from high conservative-value forests and meet the demand for SBP-compliant biomass, Warmeston OÜ has undertaken a supply base evaluation for primary feedstock originating from Latvia according to the SBP Framework Standard 1: Feedstock Compliance Standard and Standard 2: Verification of SBP-compliant Feedstock.

The risk assessment of the SBE is based on the Revised Regional Risk Assessment for Est Latvia V2.0 as published on 12 July 2024. Risk assessments are available on the SBP homepage: <https://sbp-cert.org/documents/normative-documents/version-2/risk-assessments/>

Warmeston SIA has developed risk mitigation measures so that feedstock can be sourced and sold as SBP-compliant feedstock. For more details, see the section Specified risk indicators and mitigation measures.

"Level A" Risk Assessment with low risks used to ensure the compliance with RED requirements in Latvia.

6.2 CB evaluation of specified risk indicators and mitigation measures

Country
Latvia
Area/Sub-Scope
Primary feedstock from forest & TOF 2A category
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.
Specified risk description
See the description of risk in: https://sbp-cert.org/documents/normative-documents/version-2/risk-assessments/
Detailed description of a mitigation measure
1. All suppliers undergo a supplier approval process, during which suitability to Warmeston's supply base is assessed. Suppliers must sign a code of conduct covering requirements on feedstock sourcing and submit a declaration of feedstock origin covering sub-suppliers and countries of origin. 2. Guidance is provided to SBE suppliers regarding identified threats to the forests and areas of high conservation values and management measures to be implemented to

mitigate these risks.

3. The origin of all feedstock deliveries (including supplier, feedstock type, delivered 1. All suppliers undergo a supplier approval process, during which suitability to Warmeston's supply base is assessed. Suppliers must sign a code of conduct covering requirements on feedstock sourcing and submit a declaration of feedstock origin covering sub-suppliers and countries of origin.

2. Guidance is provided to SBE suppliers regarding identified threats to the forests and areas of high conservation values and management measures to be implemented to mitigate these risks.

3. The origin of all feedstock deliveries (including supplier, feedstock type, delivered volume, certification status, and origin of feedstock) is verified at the factory gate.

4. The origin of primary feedstock is validated against the Ozols database to pre-screening deliveries for Natura 2000 forest habitats and the occurrence of protected species within harvesting sites. Other tools using the same map layers are accepted such as data from <https://biotop.eeway.eu/>. Deliveries with a risk of the material originating from Natura 2000 a forest habitat type or site of protected species are rejected under the scope of SBE.

5. In the case of an identified HCV threat within a harvesting site a field visit may be used to verify the HCV is intact. Material is only accepted if the field visit confirms the WKH has been preserved.

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

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

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

Detailed description of CB evaluation of mitigation measure and its conclusions

1. Suppliers devote themselves not to delivering biomass originating from HCV areas and the countries of origin are identified.

2. Suppliers are aware of threats to HCV areas in forests and are trained in using mitigation measures to reduce the risk of sourcing and delivering biomass originating from these areas.

3. No deliveries with unknown origins are accepted.

4. Material from high-risk areas is identified and avoided.

5. Material from harvesting sites where an HCV is present is only accepted if the HCV has been preserved and this is confirmed via a protocolled site visit.

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

Country

Latvia

Area/Sub-Scope

Primary feedstock from forest & TOF 2A category
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.
Specified risk description
See the description of risk in: https://sbp-cert.org/documents/normative-documents/version-2/risk-assessments/
Detailed description of a mitigation measure
1. All suppliers undergo a supplier approval process, during which suitability to Warmeston's supply base is assessed. Suppliers must sign a code of conduct covering requirements on feedstock sourcing and submit a declaration of feedstock origin covering sub-suppliers and countries of origin. 2. Guidance is provided to SBE suppliers regarding identified threats to the forests and areas of high conservation values and management measures to be implemented to mitigate these risks. 3. The origin of all feedstock deliveries (including supplier, feedstock type, delivered volume, certification status, and origin of feedstock) is verified at the factory gate. 4. The origin of primary feedstock is validated against the Ozols database for pre-screening deliveries for Natura 2000 forest habitats and the occurrence of protected species within harvesting sites. Other tools using the same map layers are accepted such as data from https://biotop.eeway.eu/. Deliveries with a risk of the material originating from Natura 2000 a forest habitat type or site of protected species are rejected under the scope of SBE. 5. In the case of an identified HCV threat within a harvesting site a field visit may be used to verify the HCV is intact. Material is only accepted if the field visit confirms the WKH has been preserved. 6. Annual sample-based supplier audits and forest visits are carried out to assess the performance of the suppliers and check the absence of identified risks in the forests. If risks are identified sourcing under the scope of SBE is only continued if corrective actions have been implemented and their effectiveness has been confirmed. 7. In the case of primary feedstock the SBP-recognised certification scheme must effectively mitigate the risk of indicators 2.1.1, 2.1.2, 2.1.3 and thus effectively in the case of the RRA for Latvia also indicator 3.2.3. 8. In case of processing residues the feedstock category must be verified AND feedstock sourced as feedstock is certified by an SBP-recognised certification scheme.
Detailed description of CB evaluation of mitigation measure and its conclusions
1. Suppliers devote themselves not to delivering biomass originating from HCV areas and the countries of origin are identified. 2. Suppliers are aware of threats to HCV areas in forests and are trained in using mitigation measures to reduce the risk of sourcing and delivering biomass originating from these areas. 3. No deliveries with unknown origins are accepted. 4. Material from high-risk areas is identified and avoided. 5. Material from harvesting sites where an HCV is present is only accepted if the HCV

has been preserved and this is confirmed via a protocolled site visit.
6. Suppliers' and sub-suppliers' knowledge of risk indicators and implementation of risk mitigation measures are assessed and mitigation measures are reviewed if necessary.

Country
Latvia
Area/Sub-Scope
Primary feedstock from forest & TOF 2A category
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.
Specified risk description
See the description of risk in: https://sbp-cert.org/documents/normative-documents/version-2/risk-assessments/
Detailed description of a mitigation measure
1. All suppliers undergo a supplier approval process, during which suitability to Warmeston's supply base is assessed. Suppliers must sign a code of conduct covering requirements on feedstock sourcing and submit a declaration of feedstock origin covering sub-suppliers and countries of origin. 2. Guidance is provided to SBE suppliers regarding identified threats to the forests and areas of high conservation values and management measures to be implemented to mitigate these risks. 3. The origin of all feedstock deliveries (including supplier, feedstock type, delivered volume, certification status, and origin of feedstock) is verified at the factory gate. 4. The origin of primary feedstock is validated against the Ozols database for pre-screening deliveries for Natura 2000 forest habitats and the occurrence of protected species within harvesting sites. Other tools using the same map layers are accepted such as data from https://biotop.eeway.eu/. Deliveries with a risk of the material originating from Natura 2000 a forest habitat type or site of protected species are rejected under the scope of SBE. 5. In the case of an identified HCV threat within a harvesting site a field visit may be used to verify the HCV is intact. Material is only accepted if the field visit confirms the WKH has been preserved. 6. Annual sample-based supplier audits and forest visits are carried out to assess the performance of the suppliers and check the absence of identified risks in the forests. If risks are identified sourcing under the scope of SBE is only continued if corrective actions have been implemented and their effectiveness has been confirmed. 7. In the case of primary feedstock the SBP-recognised certification scheme must effectively mitigate the risk of indicators 2.1.1, 2.1.2, 2.1.3 and thus effectively in the case of the RRA for Latvia also indicator 3.2.3. 8. In case of processing residues the feedstock category must be verified AND feedstock sourced as feedstock is certified by an SBP-recognised certification scheme.
Detailed description of CB evaluation of mitigation measure and its conclusions

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

Country
Latvia
Area/Sub-Scope
Primary feedstock from forest & TOF 2A category
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).
Specified risk description
See the description of risk in: https://sbp-cert.org/documents/normative-documents/version-2/risk-assessments/
Detailed description of a mitigation measure
To mitigate the risk of sourcing primary feedstock from forest areas classified as having both high carbon stock and high conservation value (HCV), Warmeston applies a comprehensive risk management approach based on the findings of the Regional Risk Assessments (RRAs). 1. All suppliers undergo a supplier approval process, during which suitability to Warmeston's supply base is assessed. Suppliers must sign a code of conduct covering requirements on feedstock sourcing and submit a declaration of feedstock origin covering sub-suppliers and countries of origin. 2. Guidance is provided to SBE suppliers regarding identified threats to the forests and areas of high conservation values and management measures to be implemented to mitigate these risks. 3. The origin of all feedstock deliveries (including supplier, feedstock type, delivered volume, certification status, and origin of feedstock) is verified at the factory gate. 4. The origin of primary feedstock is validated against the Ozols database for pre-screening deliveries for Natura 2000 forest habitats and the occurrence of protected species within harvesting sites. Other tools using the same map layers are accepted such as data from https://biotop.eeway.eu/. Deliveries with a risk of the material originating from Natura 2000 a forest habitat type or site of protected species are rejected under the scope of SBE.

5. In the case of an identified HCV threat within a harvesting site a field visit may be used to verify the HCV is intact. Material is only accepted if the field visit confirms the WKH has been preserved.
6. Annual sample-based supplier audits and forest visits are carried out to assess the performance of the suppliers and check the absence of identified risks in the forests. if risks are identified sourcing under the scope of SBE is only continued if corrective actions have been implemented and their effectiveness has been confirmed.
7. In the case of primary feedstock the SBP-recognised certification scheme must effectively mitigate the risk of indicators 2.1.1, 2.1.2, 2.1.3 and thus effectively in the case of the RRA for Latvia also indicator 3.2.3.
8. In case of processing residues the feedstock category must be verified AND feedstock sourced as feedstock is certified by an SBP-recognised certification scheme.

Detailed description of CB evaluation of mitigation measure and its conclusions

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