



# Supply Base Report:

## Warmeston OÜ - Sauga production Fourth Surveillance Audit

**Sustainable Biomass Program**  
sbp-cert.org



## Completed in accordance with the Supply Base Report Template Version 2.0

For further information on the SBP Framework and to view the full set of documentation see [www.sbp-cert.org](http://www.sbp-cert.org)

### Document history

<b>Version 1.0</b>	<b>Published 26 March 2015</b>
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## 1 Overview

<b>Producer name:</b>	Warmeston OÜ - Sauga production
<b>Producer address:</b>	Kilksama küla Tori vald, 85003 Pärnu maakond, Estonia
<b>SBP Certificate Code:</b>	SBP-01-08
<b>Geographic position:</b>	58.438600, 24.576200
<b>Primary contact:</b>	Viljo Aros, +372 528 8250, viljo.aros@warmeston.ee
<b>Company website:</b>	www.warmeston.ee
<b>Date report finalised:</b>	21 Jan 2025
<b>SBR reporting period from:</b>	01 Jan 2024
<b>SBR reporting period to:</b>	31 Dec 2024
<b>Name of the Certification Body:</b>	Preferred by Nature OÜ
<b>Certification Body Approval date:</b>	06 Mar 2025
<b>SBP Standard(s) used:</b>	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 v2.0
<b>Feedstock origin (countries)</b>	Estonia, Latvia, Lithuania, Finland, Sweden, Norway, Italy, France, Croatia, Poland, United States, Ukraine
<b>Weblink to Standard(s) used:</b>	<a href="https://sbp-cert.org/documents/standards-documents/standards">https://sbp-cert.org/documents/standards-documents/standards</a>



## 2 Description of the Biomass Producer and the Supply Base

### 2.1 Description of the company

Warmeston OÜ is a leading producer of biomass fuels, focusing on wood pellets and chips. Using low-grade roundwood and wood processing residues, the company produces renewable energy solutions for industrial and residential use. Warmeston operates five pellet production facilities across Estonia and Latvia, with a combined annual capacity of 675,000 tons. Warmeston produces both premium- and industrial-grade pellets, which are sold in bulk, big bags, and 15kg bags. Products support the transition to low-carbon energy, offering high-energy-density fuels that complement solar and wind energy. Warmeston's chain of custody management system is certified according to the applicable standards of SBP, FSC and PEFC.

**Products included in the scope of SBP Certification:** *Pellets, Chips*

**Number of employees:** 83

**Annual maximum production capacity (metric tonnes):** 210000

**Number of direct feedstock suppliers:** 47

**Approximate number of feedstock sub-suppliers:** 20

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

The supply chain of Warmeston OÜ includes forest owners, forest management companies, and primary and secondary wood processors. The majority of suppliers hold an FSC or a PEFC certificate. 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.

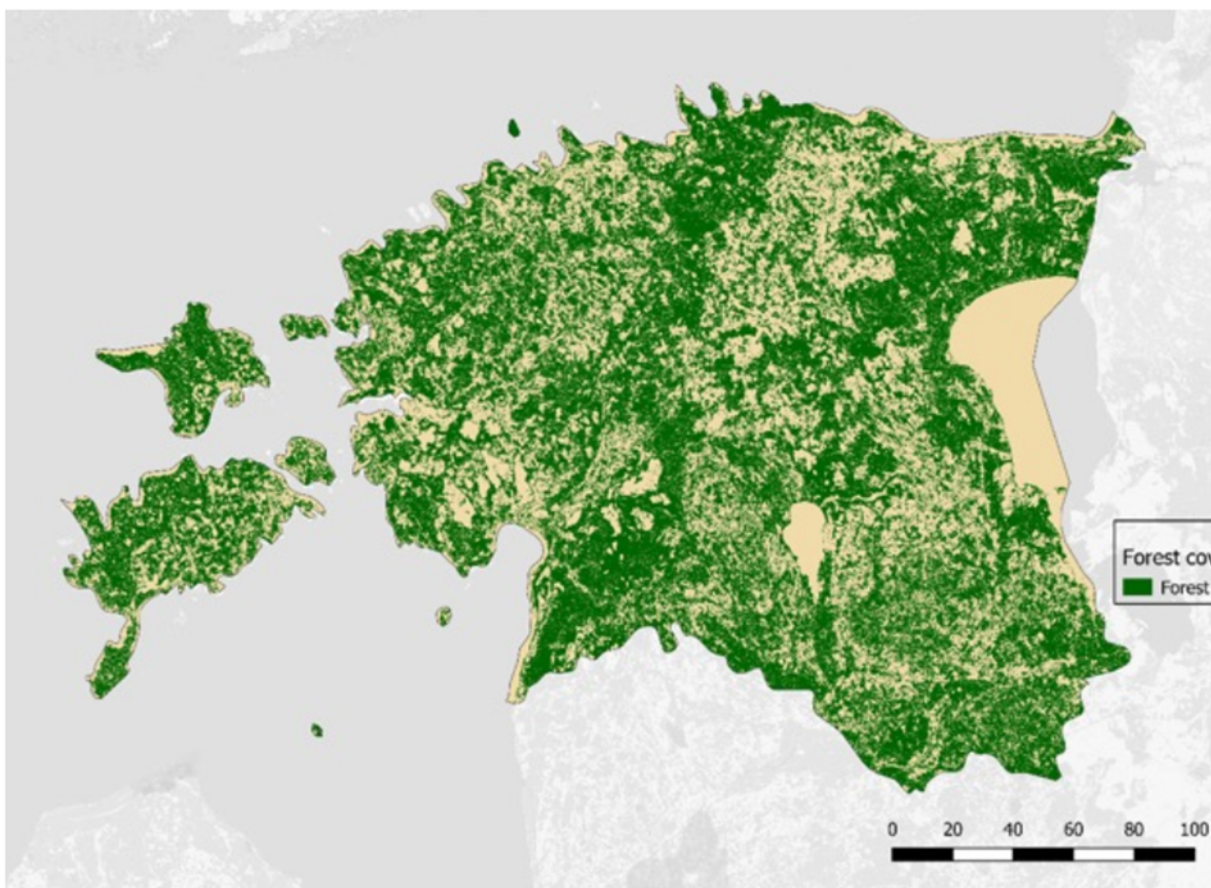
### 2.2 Detailed description of the Supply Base

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

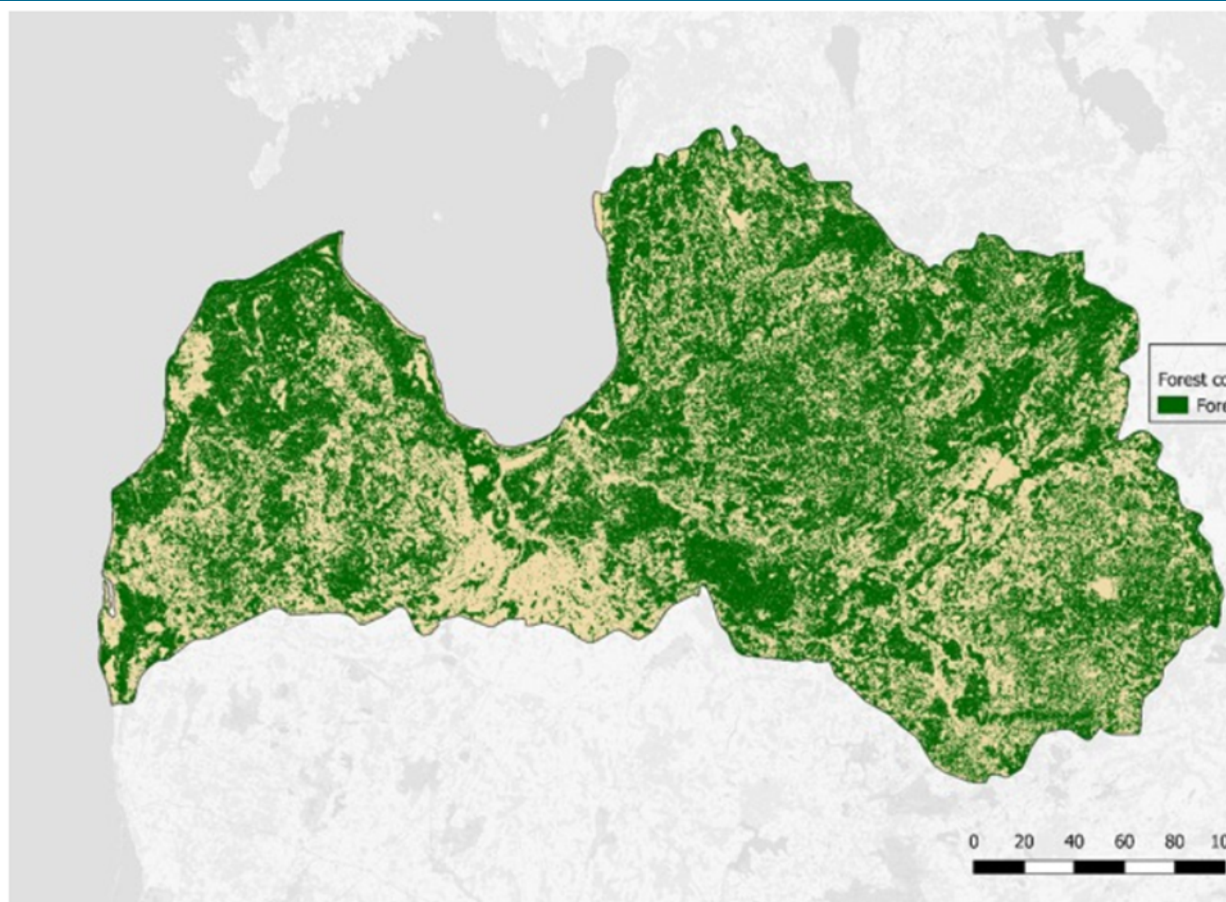
*Annex 1 is generated by the system if the SBP SBE is used without Regional Risk Assessment(s) (RRAs). In case RRA(s) is used, further details shall be given only in section 3 below.*

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

<b>Country</b>	Estonia
<b>Area/Region</b>	Estonia
<b>Exclusions</b>	N/A
<b>Feedstock types</b>	Primary, Processing residues
<b>Feedstock Product Groups</b>	Forest feedstock (1A), Processing residues feedstock (4A)
<b>Feedstock inputs</b>	SBP Compliant feedstock , SBP Controlled feedstock
<b>Is the forest managed to supply energy and non-energy markets?</b>	Yes - Majority

<b>For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?</b>	Yes - Majority
<b>Risk assessment(s)</b>	Yes – Regional Risk Assessment (RRA) used
<b>Provide a concise summary of why a SBE was determined to be required or not required here:</b>	
An SBE was conducted because the proportion of processing residues certified under an SBP-recognized certification scheme available around the factory is insufficient to meet the demand for SBP-compliant biomass.	
<b>Feedstock types included in SBE:</b>	Primary, Processing residues
<b>Includes RED II SBE:</b>	Yes
<b>Includes RED II TOF:</b>	No
<b>Size of Supply Base area (million ha):</b>	2.4380
<b>Map(s) of the Supply Base area:</b>	
	
<p>1 Forest cover: © ESA WorldCover project [2021] / Contains modified Copernicus Sentinel data ([2021]) processed by ESA WorldCover consortium; Administrative boundaries: made with Natural Earth; Base map: Map tiles by CartoD under CC BY 3.0. Data by OpenStreetMap, under ODbL.</p>	

<b>Country</b>	Latvia
<b>Area/Region</b>	Latvia
<b>Exclusions</b>	N/A
<b>Feedstock types</b>	Primary, Processing residues
<b>Feedstock Product Groups</b>	Forest feedstock (1A), Processing residues feedstock (4A)
<b>Feedstock inputs</b>	SBP Compliant feedstock , SBP Controlled feedstock
<b>Is the forest managed to supply energy and non-energy markets?</b>	Yes - Majority
<b>For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?</b>	Yes - Majority
<b>Risk assessment(s)</b>	Yes – Regional Risk Assessment (RRA) used
<b>Provide a concise summary of why a SBE was determined to be required or not required here:</b>	
An SBE was conducted because the proportion of processing residues certified under an SBP-recognized certification scheme available around the factory is insufficient to meet the demand for SBP-compliant biomass.	
<b>Feedstock types included in SBE:</b>	Primary, Processing residues
<b>Includes RED II SBE:</b>	Yes
<b>Includes RED II TOF:</b>	No
<b>Size of Supply Base area (million ha):</b>	3.4110
<b>Map(s) of the Supply Base area:</b>	



3 Forest cover: © ESA WorldCover project [2021] / Contains modified Copernicus Sentinel data ([2021]) processed by ESA WorldCover consortium; Administrative boundaries: made with Natural Earth; Base map: Map tiles by CartoD under CC BY 3.0. Data by OpenStreetMap, under ODbL.

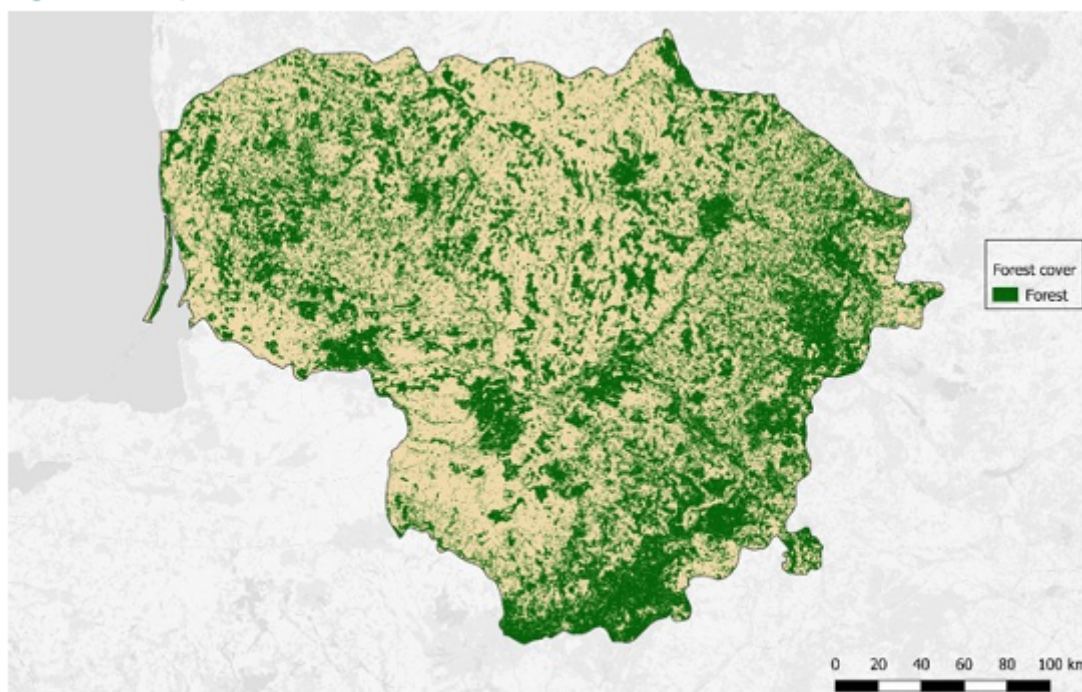
<b>Country</b>	Norway
<b>Area/Region</b>	SYSTEM ERROR CANNOT BE REMOVED
<b>Exclusions</b>	SYSTEM ERROR CANNOT BE REMOVED
<b>Feedstock types</b>	Processing residues
<b>Feedstock Product Groups</b>	Processing residues feedstock (4A)
<b>Feedstock inputs</b>	SBP Compliant feedstock , SBP Controlled feedstock
<b>Is the forest managed to supply energy and non-energy markets?</b>	N/A
<b>For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?</b>	N/A
<b>Risk assessment(s)</b>	N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme



<b>Provide a concise summary of why a SBE was determined to be required or not required here:</b>	
SYSTEM ERROR CANNOT BE REMOVED	
<b>Feedstock types included in SBE:</b>	N/A
<b>Includes RED II SBE:</b>	No
<b>Includes RED II TOF:</b>	No
<b>Size of Supply Base area (million ha):</b>	1.0000
<b>Map(s) of the Supply Base area:</b>	
SYSTEM ERROR CANNOT BE REMOVED	

<b>Country</b>	Lithuania
<b>Area/Region</b>	Lithuania
<b>Exclusions</b>	Lithuania
<b>Feedstock types</b>	Processing residues
<b>Feedstock Product Groups</b>	Processing residues feedstock (4A)
<b>Feedstock inputs</b>	SBP Compliant feedstock , SBP Controlled feedstock
<b>Is the forest managed to supply energy and non-energy markets?</b>	Yes - Majority
<b>For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?</b>	Yes - Majority
<b>Risk assessment(s)</b>	N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme

<b>Provide a concise summary of why a SBE was determined to be required or not required here:</b>	
Lithuania enters the supply base through the residues of Estonian wood processors sourcing a part of its feedstock from there. The residues delivered are certified to an SBP-recognised certification and/or controlled scheme. Due to the certification status, feedstock type, and insignificant volumes from this country of harvest, an SBE was not undertaken.	
<b>Feedstock types included in SBE:</b>	N/A
<b>Includes RED II SBE:</b>	No
<b>Includes RED II TOF:</b>	No
<b>Size of Supply Base area (million ha):</b>	2.2010
<b>Map(s) of the Supply Base area:</b>	



1 Forest cover: © ESA WorldCover project [2021] / Contains modified Copernicus Sentinel data ([2021]) processed by ESA WorldCover consortium; Administrative boundaries: made with Natural Earth; Base map: Map tiles by CartoDB, under CC BY 3.0. Data by OpenStreetMap, under ODbL.

<b>Country</b>	Finland
<b>Area/Region</b>	Finland
<b>Exclusions</b>	NA
<b>Feedstock types</b>	Processing residues
<b>Feedstock Product Groups</b>	Processing residues feedstock (4A)
<b>Feedstock inputs</b>	SBP Compliant feedstock , SBP Controlled feedstock
<b>Is the forest managed to supply energy and non-energy markets?</b>	Yes - Majority
<b>For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?</b>	Yes - Majority
<b>Risk assessment(s)</b>	N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme
<b>Provide a concise summary of why a SBE was determined to be required or not required here:</b>	
Finland enters the supply base through the residues of Estonian wood processors sourcing a part of its feedstock from there. The residues delivered are certified to an SBP-recognised certification and/or controlled scheme. Due to the certification status, feedstock type, and insignificant volumes from this country of harvest, an SBE was not undertaken.	

<b>Feedstock types included in SBE:</b>	N/A
<b>Includes RED II SBE:</b>	No
<b>Includes RED II TOF:</b>	No
<b>Size of Supply Base area (million ha):</b>	22.4090

**Map(s) of the Supply Base area:**



<b>Country</b>	Sweden
<b>Area/Region</b>	Sweden
<b>Exclusions</b>	NA

<b>Feedstock types</b>	Processing residues
<b>Feedstock Product Groups</b>	Processing residues feedstock (4A)
<b>Feedstock inputs</b>	SBP Compliant feedstock , SBP Controlled feedstock
<b>Is the forest managed to supply energy and non-energy markets?</b>	Yes - Majority
<b>For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?</b>	Yes - Majority
<b>Risk assessment(s)</b>	N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme
<b>Provide a concise summary of why a SBE was determined to be required or not required here:</b>	
Sweden enters the supply base through the residues of Estonian wood processors sourcing a part of its feedstock from there. The residues delivered are certified to an SBP-recognised certification and/or controlled scheme. Due to the certification status, feedstock type, and insignificant volumes from this country of harvest, an SBE was not undertaken.	
<b>Feedstock types included in SBE:</b>	N/A
<b>Includes RED II SBE:</b>	No
<b>Includes RED II TOF:</b>	No
<b>Size of Supply Base area (million ha):</b>	27.9800
<b>Map(s) of the Supply Base area:</b>	





<b>Country</b>	Norway
<b>Area/Region</b>	Norway
<b>Exclusions</b>	NA
<b>Feedstock types</b>	Processing residues
<b>Feedstock Product Groups</b>	Processing residues feedstock (4A)
<b>Feedstock inputs</b>	SBP Compliant feedstock , SBP Controlled feedstock
<b>Is the forest managed to supply energy and non-energy markets?</b>	Yes - Majority
<b>For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?</b>	Yes - Majority
<b>Risk assessment(s)</b>	N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme
<b>Provide a concise summary of why a SBE was determined to be required or not required here:</b>	
Norway enters the supply base through the residues of Estonian wood processors sourcing a part of its feedstock from there. The residues delivered are certified to an SBP-recognised certification and/or controlled scheme. Due to the certification status, feedstock type, and insignificant volumes from this country of harvest, an SBE was not undertaken.	
<b>Feedstock types included in SBE:</b>	N/A
<b>Includes RED II SBE:</b>	No
<b>Includes RED II TOF:</b>	No
<b>Size of Supply Base area (million ha):</b>	12.1800
<b>Map(s) of the Supply Base area:</b>	



<b>Country</b>	Italy
<b>Area/Region</b>	Italy
<b>Exclusions</b>	NA
<b>Feedstock types</b>	Processing residues
<b>Feedstock Product Groups</b>	Processing residues feedstock (4A)
<b>Feedstock inputs</b>	SBP Compliant feedstock , SBP Controlled feedstock



<b>Is the forest managed to supply energy and non-energy markets?</b>	Yes - Majority
<b>For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?</b>	Yes - Majority
<b>Risk assessment(s)</b>	N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme
<b>Provide a concise summary of why a SBE was determined to be required or not required here:</b>	
Italy enters the supply base through the residues of Estonian wood processors sourcing a part of its feedstock from there. The residues delivered are certified to an SBP-recognised certification and/or controlled scheme. Due to the certification status, feedstock type, and insignificant volumes from this country of harvest, an SBE was not undertaken.	
<b>Feedstock types included in SBE:</b>	N/A
<b>Includes RED II SBE:</b>	No
<b>Includes RED II TOF:</b>	No
<b>Size of Supply Base area (million ha):</b>	11.4320
<b>Map(s) of the Supply Base area:</b>	



<b>Country</b>	France
<b>Area/Region</b>	France
<b>Exclusions</b>	NA
<b>Feedstock types</b>	Processing residues
<b>Feedstock Product Groups</b>	Processing residues feedstock (4A)
<b>Feedstock inputs</b>	SBP Compliant feedstock , SBP Controlled feedstock

<b>Is the forest managed to supply energy and non-energy markets?</b>	Yes - Majority
<b>For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?</b>	Yes - Majority
<b>Risk assessment(s)</b>	N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme
<b>Provide a concise summary of why a SBE was determined to be required or not required here:</b>	
France enters the supply base through the residues of Estonian wood processors sourcing a part of its feedstock from there. The residues delivered are certified to an SBP-recognised certification and/or controlled scheme. Due to the certification status, feedstock type, and insignificant volumes from this country of harvest, an SBE was not undertaken.	
<b>Feedstock types included in SBE:</b>	N/A
<b>Includes RED II SBE:</b>	No
<b>Includes RED II TOF:</b>	No
<b>Size of Supply Base area (million ha):</b>	18.0960
<b>Map(s) of the Supply Base area:</b>	





<b>Country</b>	Croatia
<b>Area/Region</b>	Croatia
<b>Exclusions</b>	NA
<b>Feedstock types</b>	Processing residues
<b>Feedstock Product Groups</b>	Processing residues feedstock (4A)
<b>Feedstock inputs</b>	SBP Compliant feedstock , SBP Controlled feedstock
<b>Is the forest managed to supply energy and non-energy markets?</b>	Yes - Majority
<b>For the forests in the Supply Base, is there an intention to</b>	Yes - Majority

<b>retain, restock or encourage natural regeneration within 5 years of felling?</b>	
<b>Risk assessment(s)</b>	N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme
<b>Provide a concise summary of why a SBE was determined to be required or not required here:</b>	
Croatia enters the supply base through the residues of Estonian wood processors sourcing a part of its feedstock from there. The residues delivered are certified to an SBP-recognised certification and/or controlled scheme. Due to the certification status, feedstock type, and insignificant volumes from this country of harvest, an SBE was not undertaken.	
<b>Feedstock types included in SBE:</b>	N/A
<b>Includes RED II SBE:</b>	No
<b>Includes RED II TOF:</b>	No
<b>Size of Supply Base area (million ha):</b>	2.5570
<b>Map(s) of the Supply Base area:</b>	

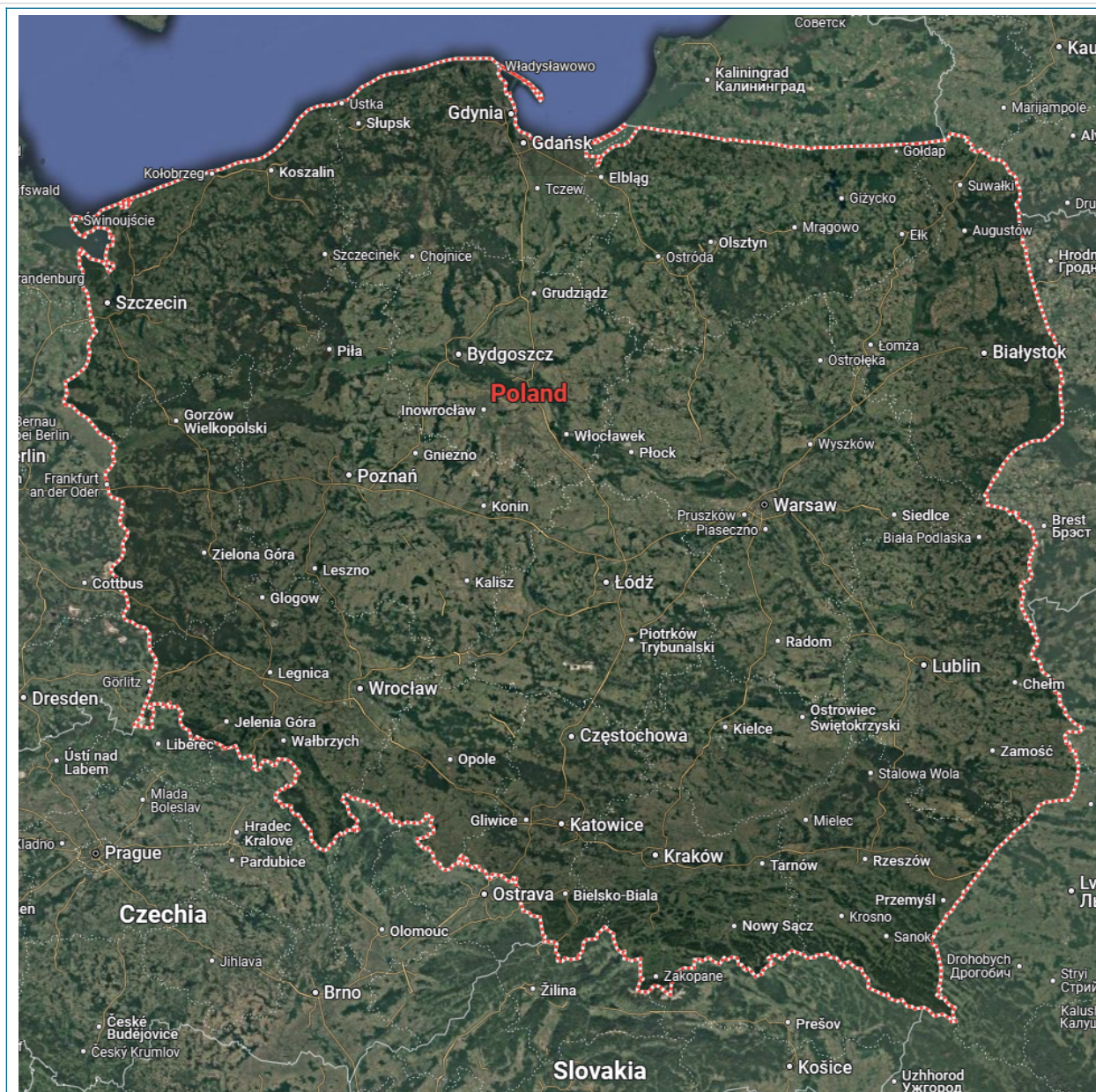




<b>Country</b>	Poland
<b>Area/Region</b>	Poland
<b>Exclusions</b>	NA
<b>Feedstock types</b>	Processing residues
<b>Feedstock Product Groups</b>	Processing residues feedstock (4A)
<b>Feedstock inputs</b>	SBP Compliant feedstock , SBP Controlled feedstock
<b>Is the forest managed to supply energy and non-energy markets?</b>	Yes - Majority

<b>For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?</b>	Yes - Majority
<b>Risk assessment(s)</b>	N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme
<b>Provide a concise summary of why a SBE was determined to be required or not required here:</b>	
Poland enters the supply base through the residues of Estonian wood processors sourcing a part of its feedstock from there. The residues delivered are certified to an SBP-recognised certification and/or controlled scheme. Due to the certification status, feedstock type, and insignificant volumes from this country of harvest, an SBE was not undertaken.	
<b>Feedstock types included in SBE:</b>	N/A
<b>Includes RED II SBE:</b>	No
<b>Includes RED II TOF:</b>	No
<b>Size of Supply Base area (million ha):</b>	9.4830
<b>Map(s) of the Supply Base area:</b>	

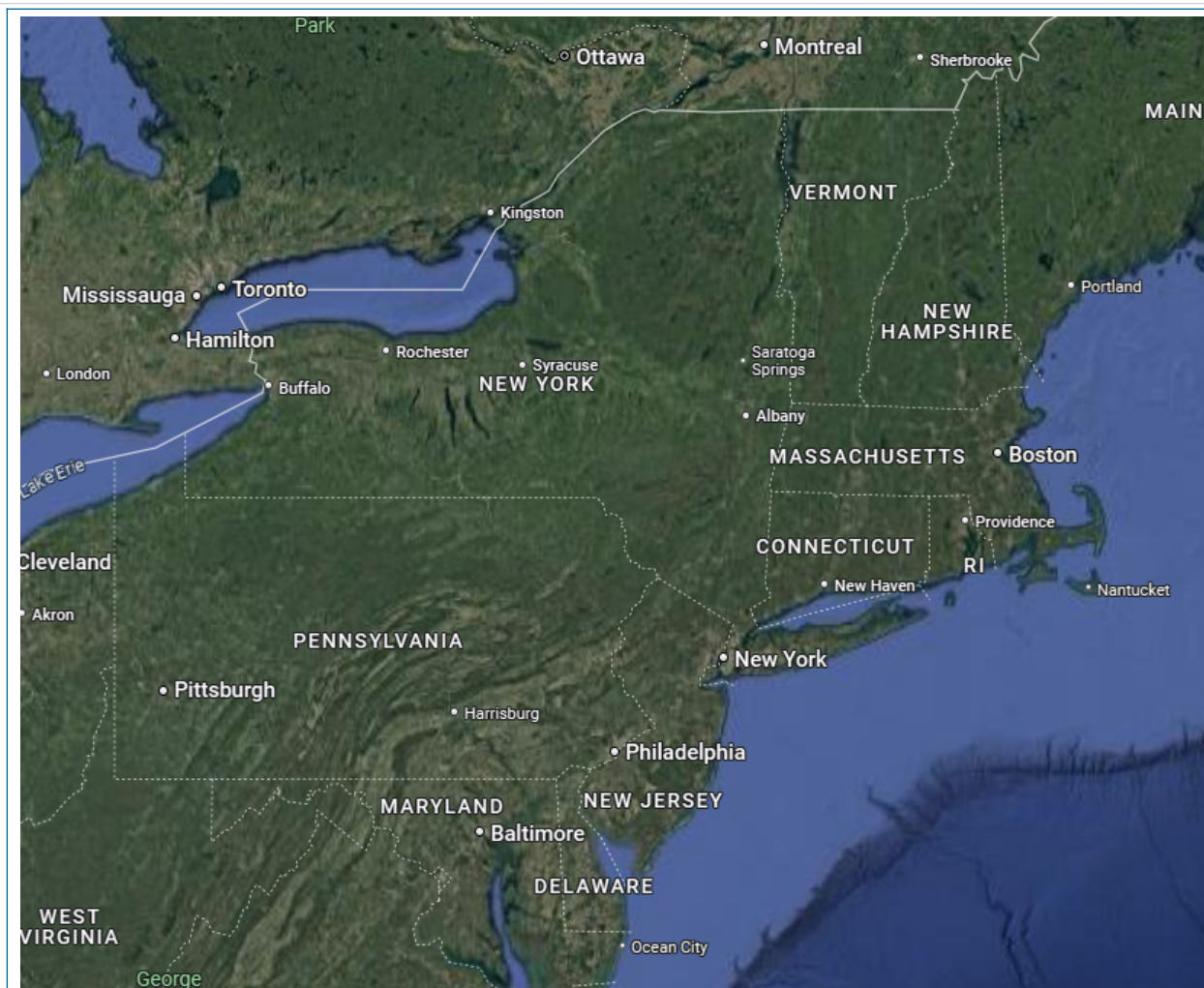




<b>Country</b>	United States
<b>Area/Region</b>	New York/Pennsylvania
<b>Exclusions</b>	only New York and Pennsylvania
<b>Feedstock types</b>	Processing residues
<b>Feedstock Product Groups</b>	Processing residues feedstock (4A)
<b>Feedstock inputs</b>	SBP Compliant feedstock , SBP Controlled feedstock
<b>Is the forest managed to supply energy and non-energy markets?</b>	Yes - Majority

<b>For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?</b>	Yes - Majority
<b>Risk assessment(s)</b>	N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme
<b>Provide a concise summary of why a SBE was determined to be required or not required here:</b>	
US enters the supply base through the residues of Estonian wood processors sourcing a part of its feedstock from there. The residues delivered are certified to an SBP-recognised certification and/or controlled scheme. Due to the certification status, feedstock type, and insignificant volumes from this country of harvest, an SBE was not undertaken.	
<b>Feedstock types included in SBE:</b>	N/A
<b>Includes RED II SBE:</b>	No
<b>Includes RED II TOF:</b>	No
<b>Size of Supply Base area (million ha):</b>	15.8750
<b>Map(s) of the Supply Base area:</b>	





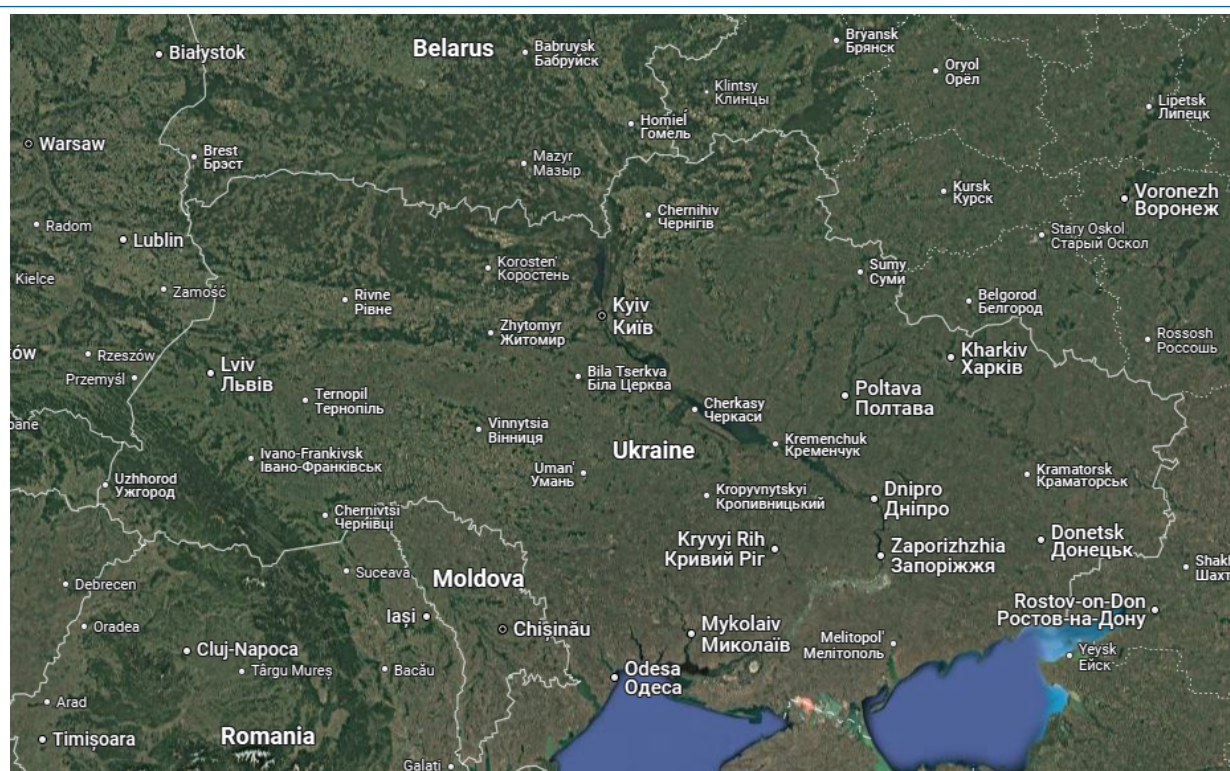
<b>Country</b>	Ukraine
<b>Area/Region</b>	
<b>Exclusions</b>	
<b>Feedstock types</b>	Processing residues
<b>Feedstock Product Groups</b>	Processing residues feedstock (4A)
<b>Feedstock inputs</b>	SBP Compliant feedstock , SBP Controlled feedstock
<b>Is the forest managed to supply energy and non-energy markets?</b>	Yes - Majority
<b>For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?</b>	Yes - Majority
<b>Risk assessment(s)</b>	N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme

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

Ukraine enters the supply base through the residues of Estonian wood processors sourcing a part of its feedstock from there. The residues delivered are certified to an SBP-recognised certification and/or controlled scheme. Due to the certification status, feedstock type, and insignificant volumes from this country of harvest, an SBE was not undertaken.

<b>Feedstock types included in SBE:</b>	N/A
<b>Includes RED II SBE:</b>	No
<b>Includes RED II TOF:</b>	No
<b>Size of Supply Base area (million ha):</b>	9.7160

**Map(s) of the Supply Base area:**



## 2.3 Feedstock information

- a. Total volume of Feedstock:** 200,000-400,000 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	Silver birch
Betula pubescens	Downy birch
Picea abies	Norway spruce
Pinus sylvestris	Scots pine
Populus tremula	European aspen
Quercus robur	English oak
Fraxinus excelsior	European ash

- 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:** Most of the feedstock used originates from regular forest management activities including clearcuts.
- e. Hardwood (i.e. broadleaf trees): specify proportion of feedstock from (%):** 77.73
- f. Softwood (i.e. coniferous trees): specify proportion of feedstock from (%):** 22.27
- 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 (%):** 1.00
- j. Select forest type(s) where the primary feedstock was sourced from:** Other Naturally Regenerated Forest
- k. Select the main harvesting system(s) used for the sourced primary feedstock:** Clearcutting
- l. Volume of primary feedstock from primary forest:** 0
- m. Volume of processing residues feedstock:** 1-200,000 tonnes  
**Physical form of the feedstock:** Chips, Sawdust
- n. Share of SBP-recognised system claim for processing residues:**

45 % FSC

5 % PEFC

- o. Volume of post-consumer feedstock:** 0  
**Physical form of the feedstock:** Chips, Sawdust
- p. Estimated amount of REDII-compliant sustainable feedstock that could be collected annually by the BP:** 400000 tonnes

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**q. What is the estimated amount of REDII-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated):** 12000000.00 tonnes

**Explanation:** In Estonia the sustainable harvesting rate for RED-compliance is around 11 000 000 m3. Considering that ca 40% of this volume is fuelwood and applying a conversion factor of 50% for the remaining volume gives an estimation for the amount of Industry residues. Since this harvesting volume can be considered sustainable and the remaining sustainability criteria for Estonia have a "Level A" compliance according to the RRA this volume can be considered as RED-II compliant. In Latvia the sustainable harvesting rate for RED-compliance is around 13 000 000 m3. Considering that ca 20% of this volume is fuelwood. Applying a conversion factor of 50% for the remaining part gives an estimation for the amount of Industry residues. Since Latvia has "Level A" compliance for RED-II sustainability requirements this volume can be considered as RED-II. The share of other countries of origin was not accounted for as these are not direct sourcing areas, but only the countries of harvest for a small share of the processing residues sourced from Estonian wood processors.

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### 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). RED II Supply Base Evaluation details are reported in Annex 2.*

☐ **Not Applicable – Supply Base Evaluation not implemented**

#### 3.1 Summary of the Supply Base Evaluation

The SBE process is based on the SBP Revised Regional Risk Assessments (RRA) for Estonia and Latvia (Version 2.0, July 2024) to identify and mitigate risks in biomass sourcing. In the case of primary feedstock, the SBE procedure is also implemented for FSC and PEFC certified material considering the results of the "Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification" and the evaluation of the Forest Stewardship Council (FSC) and Programme for the Endorsement of Forest Certification (PEFC) scheme.

#### Risk Identification & Management

The specified risks include indicators 2.1.1, 2.1.2, 2.1.3, and 3.2.3 and are related to the protection of Woodland Key Habitats (WKHs), Natura 2000 habitat types and sites of protected species. To mitigate these risks Warmeston applies the following measures:

- Supplier Approval & Compliance – Suppliers sign a Code of Conduct and declare feedstock origin.
- Verification & Database Checks – Feedstock origin is validated and HCV are checked against recognised databases.
- Expert Assessments – Independent experts confirm the absence of HCV attributes before sourcing.
- Audits & Field Inspections – Annual audits ensure ongoing compliance.

#### Monitoring & Outcomes

- Biomass is only sourced from low-risk areas or expert-approved sites.
- Suppliers are trained and monitored for compliance.
- Processing residues must be certified or verified as low-risk.
- This process ensures sustainable and SBP-compliant biomass sourcing.

#### Estonia:

During the reporting period, a random sample was compiled from the forest management units of suppliers, which could provide supplies to Warmeston. Written control sheets from field visits are available in the office. Expert opinions and field inspections did not identify any additional high conservation value areas, which supports the relevance of the databases used as a risk mitigation measure. In addition 6 SBE supplier audits were carried out. During the reporting period, a random sample was compiled from the forest management units of suppliers, which could provide supplies to Warmeston. Written control sheets from field visits are available in the office. Expert opinions and field inspections did not identify any additional high conservation value areas, which supports the relevance of the databases used as a risk mitigation measure. Furthermore, 6 SBE supplier audits were carried

out which confirmed, that the agreed procedures were functioning well and no non-conformities were detected.

### 3.2 Conflicts with applicable national and sub-national legislation

NA

### 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.*

<b>Country:</b> Estonia	
<b>Area/sub-scope:</b> Estona	
<b>Risk Assessment used:</b>	
	<input type="checkbox"/> British Columbia, Canada <input type="checkbox"/> Denmark <input type="checkbox"/> Estonia <input type="checkbox"/> Latvia <input type="checkbox"/> Lithuania <input type="checkbox"/> Quebec, Canada <input type="checkbox"/> Biomass Producer's own risk assessment
<b>Indicator with specified risk:</b>	
2.1.1 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.	
<b>Description of the specific risk:</b>	
Analysis suggests that although the key species, ecosystems, and HCVs in forests are generally identified, some WKHs and Natura 2000 forest land are not inventoried and thus this indicator is assigned a specified risk.	
<b>Mitigation measure:</b>	
<ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>4. The origin of primary feedstock is validated against the WKH database, the potential WKH database, and the Natura 2000 forest habitats database. Deliveries with a risk of the material originating from a WKH or Natura 2000 forest habitat type are rejected under the scope of SBE.</li> <li>5. In the case of an identified potential WKH threat, a licensed WKH expert may be used to verify the absence of WKH within the planned harvesting site. Material is only accepted if the expert review confirms the absence of a WKH within the site.</li> <li>6. In the case of a potential forest habitat type threat, an independent and licensed forest consul may be used to verify the absence of the forest habitat type within the planned harvesting sites in Natura 2000</li> </ol>	

areas. Material is only accepted if the expert review confirms the absence of the forest habitat types within the planned harvesting site not covered by an updated inventory conducted by or on behalf of the Environmental Board.

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

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

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

#### Monitoring and outcomes:

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

**Country:** Estonia

**Area/sub-scope:** Estonia

#### Risk Assessment used:

- ☐ British Columbia, Canada
- ☐ Denmark
- ☐ Estonia
- ☐ Latvia
- ☐ Lithuania
- ☐ Quebec, Canada
- ☐ 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:

The above analysis suggests that some WKHs and Natura 2000 forest land are not inventoried and thus, threats to and impacts on the identified key species, habitats, ecosystems, and HCV pertaining to

biodiversity in these areas are not known. Therefore, the risk class for this indicator is assessed to be specified.

#### **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 WKH database, the potential WKH database, and the Natura 2000 forest habitats database. Deliveries with a risk of the material originating from a WKH or Natura 2000 forest habitat type are rejected under the scope of SBE.
5. In the case of an identified potential WKH threat, a licensed WKH expert may be used to verify the absence of WKH within the planned harvesting site. Material is only accepted if the expert review confirms the absence of a WKH within the site.
6. In the case of a potential forest habitat type threat, an independent and licensed forest consul may be used to verify the absence of the forest habitat type within the planned harvesting sites in Natura 2000 areas. Material is only accepted if the expert review confirms the absence of the forest habitat types within the planned harvesting site not covered by an updated inventory conducted by or on behalf of the Environmental Board.
7. Annual sample-based supplier audits and forest visits are carried out to assess the performance of the suppliers and check the absence of identified risks in the forests. If risks are identified sourcing under the scope of SBE is only continued if corrective actions have been implemented and their effectiveness has been confirmed.
8. In case of primary feedstock the SBP-recognised certification scheme must effectively mitigate the risk of indicators 2.1.1, 2.1.2, 2.1.3 and thus effectively in case of the RRA for Estonia also indicator 3.2.3.
9. In case of processing residues the feedstock category must be verified AND feedstock sourced as feedstock is certified by an SBP-recognised certification scheme.

#### **Monitoring and outcomes:**

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



<b>Country:</b> Estonia	
<b>Area/sub-scope:</b> Estonia	
<b>Risk Assessment used:</b>	
	<input type="checkbox"/> British Columbia, Canada <input type="checkbox"/> Denmark <input type="checkbox"/> Estonia <input type="checkbox"/> Latvia <input type="checkbox"/> Lithuania <input type="checkbox"/> Quebec, Canada <input type="checkbox"/> Biomass Producer's own risk assessment
<b>Indicator with specified risk:</b>	
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.	
<b>Description of the specific risk:</b>	
<p>As the above analysis suggests, the enhancement and maintenance of key species, habitats, ecosystems, and HCVs pertaining to biodiversity in some WKHs and Natura 2000 forest land cannot be guaranteed. Therefore, the level of risk for this indicator is assessed as "specified".</p>	
<b>Mitigation measure:</b>	
<ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>4. The origin of primary feedstock is validated against the WKH database, the potential WKH database, and the Natura 2000 forest habitats database. Deliveries with a risk of the material originating from a WKH or Natura 2000 forest habitat type are rejected under the scope of SBE.</li> <li>5. In the case of an identified potential WKH threat, a licensed WKH expert may be used to verify the absence of WKH within the planned harvesting site. Material is only accepted if the expert review confirms the absence of a WKH within the site.</li> <li>6. In the case of a potential forest habitat type threat, an independent and licensed forest consul may be used to verify the absence of the forest habitat type within the planned harvesting sites in Natura 2000 areas. Material is only accepted if the expert review confirms the absence of the forest habitat types within the planned harvesting site not covered by an updated inventory conducted by or on behalf of the Environmental Board.</li> <li>7. Annual sample-based supplier audits and forest visits are carried out to assess the performance of the suppliers and check the absence of identified risks in the forests. If risks are identified sourcing under the scope of SBE is only continued if corrective actions have been implemented and their effectiveness has been confirmed.</li> <li>8. In case of primary feedstock the SBP-recognised certification scheme must effectively mitigate the risk of indicators 2.1.1, 2.1.2, 2.1.3 and thus effectively in case of the RRA for Estonia also indicator 3.2.3.</li> <li>9. In case of processing residues the feedstock category must be verified AND feedstock sourced as feedstock is certified by an SBP-recognised certification scheme.</li> </ol>	

<b>Monitoring and outcomes:</b>	
<ol style="list-style-type: none"> <li>1. Suppliers devote themselves not to delivering biomass originating from HCV areas and the countries of origin are identified.</li> <li>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.</li> <li>3. No deliveries with un-known origins are accepted.</li> <li>4. Material from high-risk areas are identified and avoided.</li> <li>5. The absence of HCVs in harvesting areas where up-to-date information is not available is verified by independent and licenced experts. Sourcing is avoided if expert reviews is not available or an presence of a HCV is confirmed within the harvesting site.</li> <li>6. See outcome nr 5.</li> <li>7. Suppliers' and sub-suppliers' knowledge of risk indicators and implementation of risk mitigation measures are assessed and mitigation measures are reviewed if necessary.</li> </ol>	

<b>Country:</b> Estonia	
<b>Area/sub-scope:</b> Estonia	
<b>Risk Assessment used:</b>	
	<input type="checkbox"/> British Columbia, Canada <input type="checkbox"/> Denmark <input type="checkbox"/> Estonia <input type="checkbox"/> Latvia <input type="checkbox"/> Lithuania <input type="checkbox"/> Quebec, Canada <input type="checkbox"/> Biomass Producer's own risk assessment
<b>Indicator with specified risk:</b>	
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).	
<b>Description of the specific risk:</b>	
Based on the evidence reviewed, the risk for non-compliance with this indicator is concluded to be specified. Related to the risk conclusion, see also indicators 2.1.1 and 2.1.3.	
<b>Mitigation measure:</b>	
<p>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).</p> <ol style="list-style-type: none"> <li>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.</li> <li>2. Guidance is provided to SBE suppliers regarding identified threats to the forests and areas of high</li> </ol>	

- 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 WKH database, the potential WKH database, and the Natura 2000 forest habitats database. Deliveries with a risk of the material originating from a WKH or Natura 2000 forest habitat type are rejected under the scope of SBE.
  5. In the case of an identified potential WKH threat, a licensed WKH expert may be used to verify the absence of WKH within the planned harvesting site. Material is only accepted if the expert review confirms the absence of a WKH within the site.
  6. In the case of a potential forest habitat type threat, an independent and licensed forest consul may be used to verify the absence of the forest habitat type within the planned harvesting sites in Natura 2000 areas. Material is only accepted if the expert review confirms the absence of the forest habitat types within the planned harvesting site not covered by an updated inventory conducted by or on behalf of the Environmental Board.
  7. Annual sample-based supplier audits and forest visits are carried out to assess the performance of the suppliers and check the absence of identified risks in the forests. If risks are identified sourcing under the scope of SBE is only continued if corrective actions have been implemented and their effectiveness has been confirmed.
  8. In case of primary feedstock the SBP-recognised certification scheme must effectively mitigate the risk of indicators 2.1.1, 2.1.2, 2.1.3 and thus effectively in case of the RRA for Estonia also indicator 3.2.3.
  9. In case of processing residues the feedstock category must be verified AND feedstock sourced as feedstock is certified by an SBP-recognised certification scheme.

#### Monitoring and outcomes:

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

**Risk Assessment used:**

- ☐ British Columbia, Canada
- ☐ Denmark
- ☐ Estonia

	<input type="checkbox"/> Latvia <input type="checkbox"/> Lithuania <input type="checkbox"/> Quebec, Canada <input type="checkbox"/> Biomass Producer's own risk assessment
<b>Indicator with specified risk:</b>	
2.1.1 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.	
<b>Description of the specific risk:</b>	
<p>HCV category 1: HCV category 1 includes major locations of concentrations of species listed in the EU Habitat and EU Birds Directive annexes are mapped on the national level through environmental protection and legislation. There is no prohibition in national legislation to harvest timber in the forest habitats of EU importance if they are not within limited management zones of the Specially Protected Nature Territories (Natura 2000 sites). According to the Nature Conservation Agency (Prioritised action framework (PAF) for Natura 2000 in Latvia), suitable protection areas could not yet be designated for three species (<i>Unio crassus</i>, <i>Osmoderma eremita</i>, <i>Barbastella barbastellus</i>) and seven habitat types of the EU importance (1 marine, 6 terrestrial). For the above reason, HCV category 1 is considered to a specified risk in Latvia.</p>	
<b>Mitigation measure:</b>	
<ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>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 <a href="https://biotop.eeway.eu/">https://biotop.eeway.eu/</a>. 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.</li> <li>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.</li> <li>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.</li> <li>7. In case of primary feedstock the SBP-recognised certification scheme must effectively mitigate the risk of indicators 2.1.1, 2.1.2, 2.1.3 and thus effectively in case of the RRA for Latvia also indicator 3.2.3.</li> <li>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.</li> </ol>	
<b>Monitoring and outcomes:</b>	
<ol style="list-style-type: none"> <li>1. Suppliers devote themselves not to delivering biomass originating from HCV areas and the countries of origin are identified.</li> <li>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.</li> </ol>	



3. No deliveries with un-known origins are accepted.
4. Material from high-risk areas are identified and avoided.
5. Material from harvesting sites where a HCV is present is only accepted if the HCV has been preserved and this is confirmed via a protocolled site visit.
6. Suppliers' and sub-suppliers' knowledge of risk indicators and implementation of risk mitigation measures are assessed and mitigation measures are reviewed if necessary.

**Country:** Latvia

**Area/sub-scope:** Latvia

**Risk Assessment used:**

- ☐ British Columbia, Canada
- ☐ Denmark
- ☐ Estonia
- ☐ Latvia
- ☐ Lithuania
- ☐ Quebec, Canada
- ☐ 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:**

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

Based on the above analysis the risk class for this Indicator is assessed as specified.

**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 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 case of primary feedstock the SBP-recognised certification scheme must effectively mitigate the risk of indicators 2.1.1, 2.1.2, 2.1.3 and thus effectively in case of the RRA for Latvia also indicator 3.2.3.
8. In case of processing residues the feedstock category must be verified AND feedstock sourced as feedstock is certified by an SBP-recognised certification scheme.

#### Monitoring and outcomes:

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

**Country:** Latvia

**Area/sub-scope:** Latvia

#### Risk Assessment used:

- ☐ British Columbia, Canada
- ☐ Denmark
- ☐ Estonia
- ☐ Latvia
- ☐ Lithuania
- ☐ Quebec, Canada
- ☐ 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:

The detailed assessment done concerning forests under various HCV Categories under indicators 2.1.1 and 2.1.2 suggests that the risks and threats to certain key species and their habitats (related to HCV category 1 in all forests) are not identified and evaluated. Without such identification and evaluation, there is a risk that those key species and habitats cannot be maintained or enhanced adequately.

Based on the above analysis the risk class for this Indicator is assessed specified.

<b>Mitigation measure:</b>	
<ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>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 <a href="https://biotop.eeway.eu/">https://biotop.eeway.eu/</a>. 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.</li> <li>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.</li> <li>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.</li> <li>7. In case of primary feedstock the SBP-recognised certification scheme must effectively mitigate the risk of indicators 2.1.1, 2.1.2, 2.1.3 and thus effectively in case of the RRA for Latvia also indicator 3.2.3.</li> <li>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.</li> </ol>	
<b>Monitoring and outcomes:</b>	
<ol style="list-style-type: none"> <li>1. Suppliers devote themselves not to delivering biomass originating from HCV areas and the countries of origin are identified.</li> <li>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.</li> <li>3. No deliveries with un-known origins are accepted.</li> <li>4. Material from high-risk areas are identified and avoided.</li> <li>5. Material from harvesting sites where a HCV is present is only accepted if the HCV has been preserved and this is confirmed via a protocolled site visit.</li> <li>6. Suppliers' and sub-suppliers' knowledge of risk indicators and implementation of risk mitigation measures are assessed and mitigation measures are reviewed if necessary.</li> </ol>	

<b>Country:</b> Latvia	
<b>Area/sub-scope:</b> Latvia	
<b>Risk Assessment used:</b>	
	<input type="checkbox"/> British Columbia, Canada

	<input type="checkbox"/> Denmark <input type="checkbox"/> Estonia <input type="checkbox"/> Latvia <input type="checkbox"/> Lithuania <input type="checkbox"/> Quebec, Canada <input type="checkbox"/> Biomass Producer's own risk assessment
<b>Indicator with specified risk:</b>	
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).	
<b>Description of the specific risk:</b>	
<p>There is a risk that insufficiently mapped HCV areas remain and there are significant gaps in the information. The possibility that these areas overlap with areas with high carbon stocks such as mature secondary forests, cannot be ruled out. Moreover, harvesting can occur in important habitats and harvesting may pose a risk to threatened bird species through the destruction of nests as not all nesting areas are identified.</p> <p>Thus there is a risk of a non-conformity with this requirement which is given the risk classification of specified. See also indicators 2.1.1-2.1.3 for more details.</p>	
<b>Mitigation measure:</b>	
<p>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).</p> <ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>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 <a href="https://biotop.eeway.eu/">https://biotop.eeway.eu/</a>. 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.</li> <li>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.</li> <li>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.</li> <li>7. In case of primary feedstock the SBP-recognised certification scheme must effectively mitigate the risk of indicators 2.1.1, 2.1.2, 2.1.3 and thus effectively in case of the RRA for Latvia also indicator 3.2.3.</li> <li>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.</li> </ol>	



**Monitoring and outcomes:**

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

## 4 Stakeholder engagement

### 4.1 General description

**Biomass Producer's stakeholder engagement start date:** 17 Dec 2024

**Biomass Producer's stakeholder engagement end date:** 16 Jan 2025

**Total number of stakeholders contacted:** 40

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

#### 1. Types of Stakeholders Contacted

The engagement process targeted a diverse group of stakeholders, including:

- Local environmental organizations.
- Forestry and biomass sector companies or associations.
- Government agencies and local authorities.
- Universities and educational institutions with expertise in forestry.
- Other parties directly or indirectly affected by Warmeston's supply chain activities.

#### 2. Method of Communication

The communication methods employed for stakeholder engagement included:

- **Public Consultation:** A 30-day public consultation period was held from December 17, 2024, to January 16, 2025. Stakeholders were invited to provide feedback via email to the designated contact person, Viljo Aros.
- **Information Availability:** Relevant documents, such as the Risk Management Plan (RMP) and the Regional Risk Assessment (RRA), were made available through public links.
- **Direct Communication:** The Quality and Environmental Manager served as the point of contact for inquiries and consultations. Contact details were provided in the communication.

#### 3. Summary of Comments Received

- Only feedback received during the engagement process was from a forest management company suggesting that there is no high risk in the forests managed by Latvian State Forest (LVM) regarding compliance with SBP indicators 2.1.1, 2.1.2, 2.1.3 and 3.2.3, which is confirmed by the results of certification audits conducted independently by a third party.

### 4.2 Response to stakeholder comments

**Stakeholder description:** Latvian Forest Management Company

**Stakeholder comment:** There is no high risk in the forests managed by LVM regarding the compliance with SBP indicators 2.1.1, 2.1.2, 2.1.3 and 3.2.3, which is confirmed by the results of certification audits conducted independently by a third party (detailed analyses and information was attached).

**Response to the stakeholder:** The arguments were well structured and presented a lot of more detail than is available in the RRA. However considering the status of the RRA, the results of benchmarking of the PEFC and FSC forest certification schemes against the requirements of SBP and the fact that Latvian State forest is no longer FSC certified,

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there is not enough evidence to re-classify Latvian state forest to low risk in regards of SBP indicators 2.1.1, 2.1.2, 2.1.3 and 3.2.3.

## 5 Report updates and approval

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

New reporting period and transition to SBP's standards version 2.

<b>Name</b>	Viljo Aros
<b>Title</b>	Management representative
<b>Date of report approval</b>	21 Jan 2025



## Annex 1: Detailed findings for Supply Base Evaluation indicators

## Annex 2: RED II Supply Base Evaluation

Countries where RED II Supply Base Evaluation is used	
Country	Estonia
Area	Estonia
Sustainable harvesting criteria 29(6)	
(i) The legality of harvesting operations	
Type of Risk Assessment used	<input checked="" type="checkbox"/> Level A – proof at national or sub-national level <input type="checkbox"/> Level B – management system at forest sourcing area level
Level A risk assessment description	Level A for Estonia: SBP Revised Regional Risk Assessment v2.0
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	<input checked="" type="checkbox"/> Level A – proof at national or sub-national level <input type="checkbox"/> Level B – management system at forest sourcing area level
Level A risk assessment description	Level A for Estonia: SBP Revised Regional Risk Assessment v2.0
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 and peatlands, are protected unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes	
Type of Risk Assessment used	<input checked="" type="checkbox"/> Level A – proof at national or sub-national level <input type="checkbox"/> Level B – management system at forest sourcing area level
Level A risk assessment description	Level A for Estonia: SBP Revised Regional Risk Assessment v2.0
Level B management system at the level of the forest sourcing area	N/A
(iv) That harvesting is carried out considering the maintenance of soil quality and biodiversity with the aim of minimising negative impacts	
Type of Risk Assessment used	<input type="checkbox"/> Level A – proof at national or sub-national level <input checked="" type="checkbox"/> 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	In Estonia, apart from final felling and commercial thinnings, there are regeneration felling, sanitary cuttings and precommercial thinnings to

	<p>maintain forest health and vigour and long-term production capacity. The overall forest harvesting level in the country remains far below annual growth and thus standing stock is growing. According to Statistics Estonia (2023) less than 70% of the annual increment in forest land is harvested since 2012. This implies that harvesting level maintains a sustainable standing stock and maintain or improves the long-term production capacity and carbon stock of the forests.</p> <p>Warmeston's actions include requiring a consignment note with each transport, checked before acceptance. Warmeston OÜ collaborates with the government through the Estonian Wood and Forestry Industry Union for long-term strategies and development plans.</p> <p>Conclusion: Considering national statistics and forestry development plan documents, forest usage in Estonia is sustainably long-term, and the risk is defined as "low risk."</p>
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**(v) That harvesting maintains or improves the long-term production capacity of the forest.**

<b>Type of Risk Assessment used</b>	<input checked="" type="checkbox"/> Level A – proof at national or sub-national level <input type="checkbox"/> Level B – management system at forest sourcing area level
<b>Level A risk assessment description</b>	Level A for Estonia: SBP Revised Regional Risk Assessment v2.0
<b>Level B management system at the level of the forest sourcing area</b>	N/A
LULUCF criteria 29(7)	
<b>Type of Risk Assessment used</b>	<input checked="" type="checkbox"/> Level A – proof at national or sub-national level <input type="checkbox"/> Level B – management system at forest sourcing area level
<b>Level A risk assessment description</b>	Level A for Estonia: SBP Revised Regional Risk Assessment v2.0
<b>Level B management system at the level of the forest sourcing area</b>	N/A

**Countries where RED II Supply Base Evaluation is used**

<b>Country</b>	Latvia
<b>Area</b>	Latvia
<b>Sustainable harvesting criteria 29(6)</b>	
<b>(i) The legality of harvesting operations</b>	
<b>Type of Risk Assessment used</b>	<input checked="" type="checkbox"/> Level A – proof at national or sub-national level <input type="checkbox"/> Level B – management system at forest sourcing area level

<b>Level A risk assessment description</b>	Level A for Latvia by Climate and Energy Ministry Energy Sustainability Department
<b>Level B management system at the level of the forest sourcing area</b>	N/A
<b>(ii) Forest regeneration of harvested areas</b>	
<b>Type of Risk Assessment used</b>	<input checked="" type="checkbox"/> Level A – proof at national or sub-national level <input type="checkbox"/> Level B – management system at forest sourcing area level
<b>Level A risk assessment description</b>	Level A for Latvia by Climate and Energy Ministry Energy Sustainability Department
<b>Level B management system at the level of the forest sourcing area</b>	N/A
<b>(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands and peatlands, are protected unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes</b>	
<b>Type of Risk Assessment used</b>	<input checked="" type="checkbox"/> Level A – proof at national or sub-national level <input type="checkbox"/> Level B – management system at forest sourcing area level
<b>Level A risk assessment description</b>	Level A for Latvia by Climate and Energy Ministry Energy Sustainability Department
<b>Level B management system at the level of the forest sourcing area</b>	N/A
<b>(iv) That harvesting is carried out considering the maintenance of soil quality and biodiversity with the aim of minimising negative impacts</b>	
<b>Type of Risk Assessment used</b>	<input checked="" type="checkbox"/> Level A – proof at national or sub-national level <input type="checkbox"/> Level B – management system at forest sourcing area level
<b>Level A risk assessment description</b>	Level A for Latvia by Climate and Energy Ministry Energy Sustainability Department
<b>Level B management system at the level of the forest sourcing area</b>	N/A
<b>(v) That harvesting maintains or improves the long-term production capacity of the forest.</b>	
<b>Type of Risk Assessment used</b>	<input checked="" type="checkbox"/> Level A – proof at national or sub-national level <input type="checkbox"/> Level B – management system at forest sourcing area level
<b>Level A risk assessment description</b>	Level A for Latvia by Climate and Energy Ministry Energy Sustainability Department
<b>Level B management system at the level of the forest sourcing area</b>	N/A
<b>LULUCF criteria 29(7)</b>	
<b>Type of Risk Assessment used</b>	<input checked="" type="checkbox"/> Level A – proof at national or sub-national level <input type="checkbox"/> Level B – management system at forest sourcing area level



<b>Level A risk assessment description</b>	Level A for Latvia by Climate and Energy Ministry Energy Sustainability Department
<b>Level B management system at the level of the forest sourcing area</b>	N/A

## 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

Wood industry residues do not need to meet the sustainability requirements of the RED-II directive, but it is crucial to prove that these materials are indeed residues and not intentionally produced.

Warmeston has a list of approved suppliers which includes their name, legal address, type of supplier (producer, trader) and feedstock type. The control level of suppliers is defined in the chain of custody handbook. All suppliers have to sign a Supplier Code of Conduct and suppliers delivering wood industry residues have to submit a self-declaration stating, that the supplied materials are residues.

### Feedstock inspection and classification upon receipt

Visual inspection is applied to all suppliers and raw materials upon receipt at the gate. Additionally, photos are taken at the measuring gate and material samples in the laboratory during analyses.

### Supplier audit for processing residues and post-consumer feedstock

Suppliers of wet chips from wood industry undergo a sample-based supplier audit program. The annual sample size is at least  $\sqrt{x}$ , where x is the number of suppliers. It is also ensured that these suppliers undergo a supplier audit at least once during the certification period. If the requirements mentioned above are not met, the material is considered non-compliant with RED-II requirements.

## Annex 4: 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).*

Not Applicable (RED II TOF not included)