



Supply Base Report:

Warmeston SIA Scope Change Audit

Sustainable Biomass Program
sbp-cert.org



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

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

Document history

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1 Overview

Producer name:	Warmeston SIA
Producer address:	"Granulas", LV-5668 Cieceres pagasts, Brocēnu novads, Latvia
SBP Certificate Code:	SBP-01-70
Geographic position:	56.700880, 22.590292
Primary contact:	Viljo Aros, +372 528 8250, viljo.aros@warmeston.ee
Company website:	
Date report finalised:	21 Oct 2025
SBR reporting period from:	01 Oct 2023
SBR reporting period to:	31 Dec 2024
Name of the Certification Body:	Preferred by Nature OÜ
Certification Body Approval date:	31 Dec 2025
SBP Standard(s) used:	SBP Standard 1: Feedstock Compliance v2.0, SBP Standard 2: Feedstock Verification v2.0, SBP Standard 4: Chain of Custody v2.0, SBP Standard 5: Collection and Communication of Data v2.0, Instruction Document 5E: Collection and Communication of Energy and Carbon Data v2.0, Instruction Document EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413 v2.0
Feedstock origin (countries)	Latvia (Latvia)
Weblink to Standard(s) used:	https://sbp-cert.org/documents/standards-documents/standards

2 Description of the Biomass Producer and the Supply Base

2.1 Description of the company

Warmeston SIA is a subsidiary of Warmeston OÜ that owns and operates the Brocēni pellet plant in Latvia. This pellet plant was previously owned by Enefit Green and was acquired by Warmeston in end of December 2023.

The Brocēni plant has an annual production capacity of up to 160,000 tons and produces both premium- and industrial-grade pellets, which are sold in bulk, big bags, and 15kg bags.

Warmeston SIA's operations are part of the company's sustainability strategy, supporting renewable energy and low-carbon energy solutions by replacing fossil fuels with more environmentally friendly alternatives. 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: WB 1.1 Wood pellets, WB 2.1 Wood chips

Number of employees: 39

Annual maximum production capacity (metric tonnes): 160000

Number of direct feedstock suppliers: 65

Approximate number of feedstock sub-suppliers: 30

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

The supply chain of Warmeston SIA includes forest owners, forest management companies, and primary 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

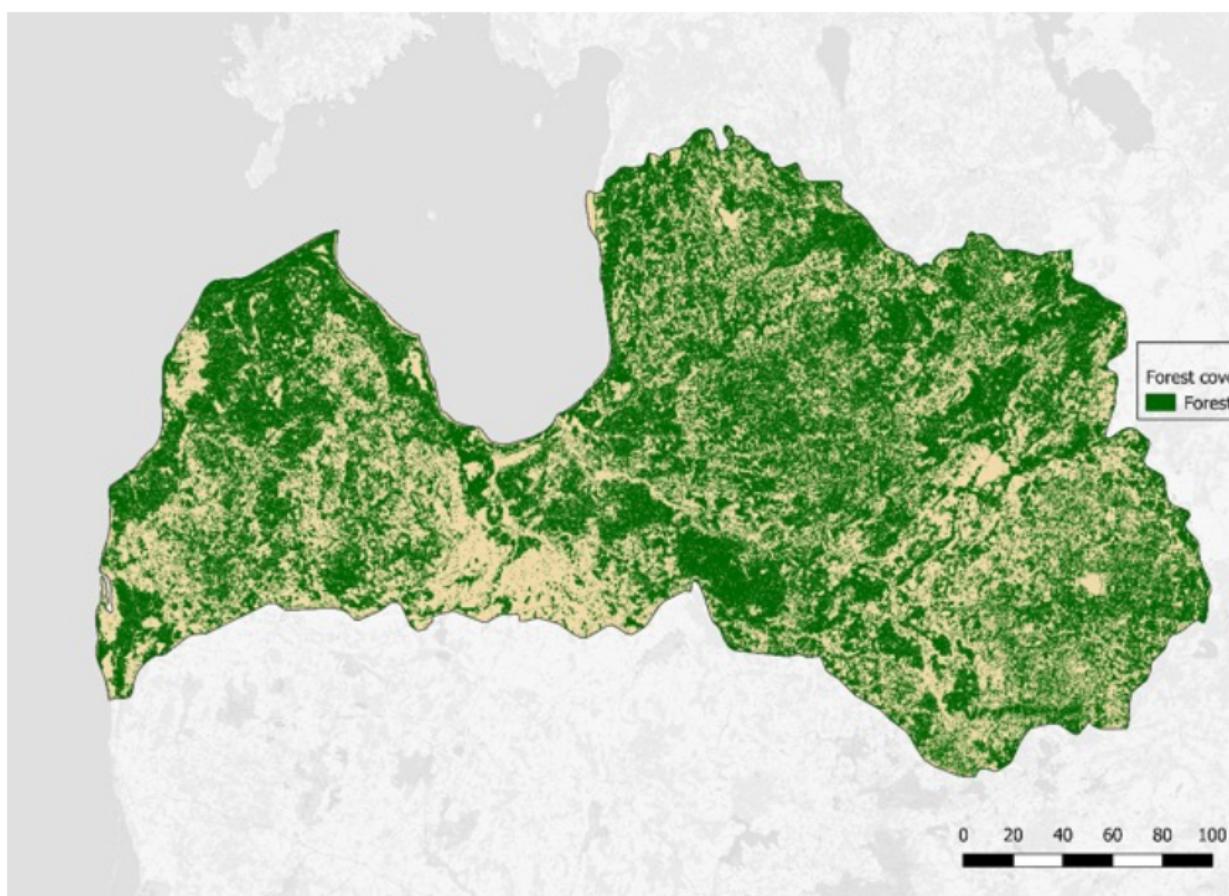
Guidance: Tables below have been generated automatically for each sourcing country based on the selection of 'Feedstock origin (countries)' in section 1 above.

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 EU RED SBE is in the scope for each country separately.

Country	Latvia
Area/Region	Latvia
Exclusions	No
Feedstock types	Primary, Processing residues1
Feedstock Product Groups	Forest feedstock (1A), Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock , SBP Controlled feedstock
Is the forest managed to supply energy and non-energy markets?	Yes - Majority

For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?	Yes - Majority
Risk assessment(s)	Yes – Regional Risk Assessment (RRA) used
Provide a concise summary of why a SBE was determined to be required or not required here:	
A SBE was conducted as the share of processing residues certified against an SBP-recognized certification scheme available at the factory is insufficient to support the demand for SBP Compliant biomass.	
Feedstock types included in SBE:	Primary, Processing residues1
Includes EU RED SBE:	Yes
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	No
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	3.4110
Map(s) of the Supply Base area:	



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 CartoDE under CC BY 3.0. Data by OpenStreetMap, under ODbL.

2.3 Feedstock information

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

Picea abies	Norway Spruce
Pinus sylvestris	Scots Pine
Alnus glutinosa	Black alder
Alnus incana	Grey alder
Betula pendula	Silver Birch
Betula pubescens	Downy Birch
Populus tremula	Aspen

- d. **Was the feedstock used in the biomass removed from a forest as part of a pest/disease control measure or a salvage operation?** Yes - Minority

Explanation: Most of the feedstock used originates from regular forest management activities including clearcuts
- e. **Hardwood (i.e. broadleaf trees): specify proportion of feedstock from (%):** 45.00
- f. **Softwood (i.e. coniferous trees): specify proportion of feedstock from (%):** 55.00
- g. **Proportion of feedstock composed of or derived from saw logs by weight (%):** 0.00
- h. **Indicate how you determine the proportion of saw log:** Specification used by the sawmill closest to where the wood was grown.
- i. **Roundwood from fellings from forests with > 40 yr rotation times - Average % volume of fellings delivered to BP (%):** 5.00
- 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:** Mix of the above
- 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:**

20 % FSC

35 % PEFC

- o. **Volume of post-consumer feedstock:** 0

Physical form of the feedstock: Chips, Sawdust
- p. **Estimated amount of EU RED-compliant sustainable feedstock that could be collected annually by the BP:** 600000 tonnes
- q. **What is the estimated amount of EU RED-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated):** 7000000.00 tonnes

Explanation: 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.

3 Supply Base Risk Assessments and Risk Management Measures

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

Not Applicable – Supply Base Evaluation not implemented

3.1 Summary of the Supply Base Evaluation

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.

During the reporting period a total of 17 HSE field visits were conducted. The results of field work verification show that the company has implemented a system to check its suppliers and contractors in connection with HSE requirements. There were no significant violations related to work safety on the part of the suppliers. For HCV a total 10 field visits were conducted. The results of the field work verification show that the company has implemented and operates a system that helps to identify HCV in the forest, as well as to ensure that they do not enter the company's supply chain. The company checks all delivered wood in the Eeway Biotops database, checking origin information and potential risks.

3.2 Conflicts with applicable national and sub-national legislation

N/A

3.3 Risk Management Measures

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

Country: Latvia
Area/sub-scope: N/A
Risk Assessment used:
<input type="checkbox"/> SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim <input type="checkbox"/> SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim <input type="checkbox"/> SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim <input type="checkbox"/> SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed <input type="checkbox"/> SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim <input type="checkbox"/> SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed <input checked="" type="checkbox"/> SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed <input type="checkbox"/> SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed <input type="checkbox"/> SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim <input type="checkbox"/> SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim <input type="checkbox"/> SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim <input type="checkbox"/> SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim <input type="checkbox"/> SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim <input type="checkbox"/> SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim <input type="checkbox"/> Biomass Producer's own risk assessment
Indicator with specified risk:
2.1.1 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.
Description of the specific risk:
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.
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: N/A

Risk Assessment used:

	<input type="checkbox"/> SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim <input type="checkbox"/> SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim <input type="checkbox"/> SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim <input type="checkbox"/> SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed <input type="checkbox"/> SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim <input type="checkbox"/> SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed <input checked="" type="checkbox"/> SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed <input type="checkbox"/> SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed <input type="checkbox"/> SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim
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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:	
<p>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.</p> <p>Based on the above analysis the risk class for this Indicator is assessed as specified.</p>	
Mitigation measure:	
<ol style="list-style-type: none"> 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:	
<ol style="list-style-type: none"> 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: N/A
Risk Assessment used:
<input type="checkbox"/> SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim <input type="checkbox"/> SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim <input type="checkbox"/> SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim <input type="checkbox"/> SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed <input type="checkbox"/> SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim <input type="checkbox"/> SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed <input checked="" type="checkbox"/> SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed <input type="checkbox"/> SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed <input type="checkbox"/> SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim <input type="checkbox"/> SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim <input type="checkbox"/> SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim <input type="checkbox"/> SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim <input type="checkbox"/> SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim <input type="checkbox"/> SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim <input type="checkbox"/> 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.
Mitigation measure:
<ol style="list-style-type: none"> 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: N/A

Risk Assessment used:

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Indicator with specified risk:	
3.2.3 feedstock shall not be sourced from forest areas in the Supply Base which, according to local definitions or norms, are classified as having combined attributes of high carbon stocks and high conservation value (HCV).	
Description of the specific risk:	
<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>	
Mitigation measure:	
<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"> 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.

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: 21

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

SBE/RRA RMP ENGAGEMENT

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 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.

RED3 RMP ENGAGEMENT

Biomass Producer's stakeholder engagement start date: 09.09.2025

Biomass Producer's stakeholder engagement end date: 09.10.2025

Total number of stakeholders contacted: 20

Give a general description of the process of Stakeholders Engagement:

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 September 9, 2025, to October 9, 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 on request.
- 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

- During the stakeholder engagement period, only one formal response was received. The Ministry of Agriculture of Latvia requested access to the Risk Management Plan (RMP). The requested materials were provided, and receipt was confirmed. However, no further comments or feedback regarding the Regional Risk Assessment (RRA) were received following this initial exchange.

4.2 Response to stakeholder comments

Stakeholder description: 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, 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)

RED-III scope extension and updated annex 2 - EU RED SBE findings.

Name	Viljo Aros
Title	Management representative
Date of report approval	21 Oct 2025

Annex 1: Detailed findings for Supply Base Evaluation indicators

Annex 2: EU RED Supply Base Evaluation

Countries where EU RED Supply Base Evaluation is used	
Country	Latvia
Area	Latvia
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	SBP-RED-EU-LV-FOR_v1.0 REDIII Level A for Latvia FOR
Level B management system at the level of the forest sourcing area	N/A
(ii) Forest regeneration of harvested areas	
Type of Risk Assessment used	<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	SBP-RED-EU-LV-FOR_v1.0 REDIII Level A for Latvia FOR
Level B management system at the level of the forest sourcing area	N/A
(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grasslands, heathland and peatlands, are protected with the aim of preserving biodiversity and preventing habitat destruction, unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes	
Type of Risk Assessment used	<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	The same risk mitigation measures described in the SBR for indicators 2.1.1, 2.1.2, and 2.1.3 of the "SBP Revised Regional Risk Assessment for Latvia v2.0" are applied to ensure that sourcing does not occur from designated protected areas.
(iv) that harvesting is carried out considering the maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth forests as defined in the country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located, and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with requirements to use logging systems that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and	

habitats	
Type of Risk Assessment used	<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	<p>Harvesting of stumps and roots Warmeston does not source stumps or roots. If such material is delivered, it is rejected at reception. All incoming feedstock is verified accordingly at the factory gates.</p> <p>Harvesting of Primary Forest and Old Growth Forest (OGF) The Latvian legislation covers „primary forest and other wooded land – forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed”. The level A risk assessment for RED-II has considered this risk as low and attention should be paid to PF and OGF outside protected areas. These could be found in HCV forests. The same risk mitigation measures referenced for indicators 2.1.1, 2.1.2, and 2.1.3 of the “SBP Revised Regional Risk Assessment for Latvia v2.0” are applied to exclude biomass from these areas. Warmeston will monitor for any updates in the risk assessments and apply additional measures as needed.</p> <p>Retention thresholds for deadwood extraction Warmeston monitors deadwood volumes in harvesting sites using data from the Silava. If retention falls below 5 m³/ha or 5 trunks/ha, additional mitigation actions are initiated to ensure compliance. Although there is no general requirement the amount of dead wood in Latvian forests has increased by 7.97 million m³ or 14.1% and averages on 19.85 m³/ha according to Silava. In addition, Warmeston conducts supplier field audits to verify that harvesting sites maintain, on average, at least 5 m³/ha or 5 trunks/ha of dead wood. Audits are carried out within 12-months reporting period on a sample basis for deliveries not covered by FSC or PEFC certification. The number of sites selected for audit is calculated using the formula $0.3 \times \sqrt{X}$, where X represents the number of harvesting sites from which material was delivered during the period. If audit results indicate non-conformance, Warmeston initiates corrective actions, including supplier guidance and re-auditing of subsequent harvest sites. Warmeston monitors the official statistics and for any changes in the legislation or risk assessments covering this requirement and apply additional measures as needed.</p>
(v) That harvesting maintains or improves the long-term production capacity of the forest.	
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	SBP-RED-EU-LV-FOR_v1.0 REDIII Level A for Latvia FOR

Level B management system at the level of the forest sourcing area	N/A
<p>(vi)¹ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.</p> <p><i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i></p> <p><i>(a) primary forest and other wooded land and old growth forest, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located. If there is no definition of old growth forest at the national level, then the following definition shall apply: A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-serial developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.</i></p>	
<p>Type of Risk Assessment used</p> <p><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</p>	
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	<p>**Harvesting of Primary Forest and Old Growth Forest (OGF)** The Latvian legislation covers „primary forest and other wooded land – forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed”. The level A risk assessment for RED-III has considered Level B only of PF and OGF outside protected areas. These could be found in HCV forests. The same risk mitigation measures referenced for indicators 2.1.1, 2.1.2, and 2.1.3 of the “SBP Revised Regional Risk Assessment for Latvia v2.0” are applied to exclude biomass from these areas. Warmeston will monitor for any updates in the risk assessments and apply additional measures as needed.</p>
<p>(vi)² That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.</p> <p><i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i></p> <p><i>(b) highly biodiverse forest and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.</i></p>	
Type of Risk Assessment used	<p><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</p>
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	<p>Highly biodiverse forest is protected according to Law on the Protection of Species and Habitats, Law on Specially Protected Nature Territories or Law on forests only to the extent they fall under designated protected areas or micro reserves. The level A risk assessment for RED-III has considered this risk as low for protected areas. Additionally, the same risk mitigation measures referenced for indicators 2.1.1, 2.1.2, and 2.1.3 of the “SBP Revised Regional Risk Assessment for Latvia v2.0” are applied to exclude biomass from primary and old growth forests. Warmeston will monitor for any updates in the risk assessments and apply</p>

	additional measures as needed.
(vi)³ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.	
<i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i>	
	<i>(d) highly biodiverse grassland spanning more than one hectare that is: (i) natural, namely grassland that would remain grassland in the absence of human intervention and that maintains the natural species composition and ecological characteristics and processes; or (ii) non-natural, namely grassland that would cease to be grassland in the absence of human intervention and that is species-rich and not degraded and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the harvesting of the raw material is necessary to preserve its status as highly biodiverse grassland.</i>
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	The Latvian legislation covers grassland with high biodiversity value included in the list of protected nature territories of European significance (Natura 2000), or areas declared for support in the sub-measure "Maintenance of Biological Diversity in Grasslands" of the measure "Agrovide [agri-environment] payments" pursuant to the regulatory enactments regarding the granting of the State and European Union development support for improving environmental and rural landscape. The level A risk assessment for RED-II has considered this risk as low. Highly biodiverse natural grasslands are protected and do not contain trees significant for biomass production. Due to the geographic region managed grasslands would overgrow with forest if no management is undertaken. Additionally, the same risk mitigation measures referenced for indicators 2.1.1, 2.1.2, and 2.1.3 of the "SBP Revised Regional Risk Assessment for Latvia v2.0" are applied to exclude biomass from highly biodiverse grassland. Warmeston will monitor for any updates in the risk assessments and apply additional measures as needed.
(vi)⁴ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.	
<i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i>	
	<i>(e) heathland - Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).</i>
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	Heathland is protected according to the Law on the Protection of Species and Habitats, the Law on Specially Protected Nature Territories or the Law on forests only to the extent it falls under designated protected areas or micro reserves. Additionally, the same risk mitigation measures referenced for indicators 2.1.1,

	2.1.2, and 2.1.3 of the “SBP Revised Regional Risk Assessment for Latvia v2.0” are applied to exclude biomass from highly biodiverse grassland. Warmeston will monitor for any updates in the risk assessments and apply additional measures as needed.
<p>(vi)⁵ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.</p> <p><i>Article 29 (4): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:</i></p> <p>(a) wetlands, namely land that is covered with or saturated by water permanently or for a significant part of the year</p> <p><i>(NOTE: Evidence of verification of wetlands should reflect seasonal changes within a year).</i></p>	
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	SBP-RED-EU-LV-FOR_v1.0 REDIII Level A for Latvia FOR
Level B management system at the level of the forest sourcing area	N/A
<p>(vi)⁶ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.</p> <p><i>Article 29 (5): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was peatland in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.</i></p>	
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	<p>Under SBP's RED-II risk assessment for Latvia the indicator (iii) Refer to RRA and RED-II risk assessment: *(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* as well as the RRA indicator *2.2.1“ Feedstock shall not be sourced from land that had one of the following statuses in January 2008 and no longer has that status due to land conversion: (a) forests, (b) peatlands, (c) wetlands and (d) highly* *biodiverse grassland”* were low risk. In addition, Warmeston monitors that the delivered forest biomass does not originate from Natura 2000 areas where forest habitats are present including: Alluvial forests (91E0); Fennoscandian deciduous swamp woods (*9080) and Bog woodlands (*91D0).</p>
<p>(vii) that installations producing biomass fuels from forest biomass, issue a statement of assurance, underpinned by company-level internal processes, for the purpose of the audits conducted pursuant to Article 30(3), that the forest biomass is not sourced from the lands referred to in point (vi).</p>	
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	N/A
Level B management system at the level of the forest sourcing area	<i>Not applicable, requirement only applies to Level A</i>

LULUCF criteria 29(7)	
Type of Risk Assessment used	<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	SBP-endorsed REDII Level A risk assessment for Article 29(7) LULUCF
Level B management system at the level of the forest sourcing area	N/A

Annex 2a: EU RED II Supply Base Evaluation

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

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

Verification and monitoring of suppliers

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

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

Not Applicable (RED II TOF not included)

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

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