Supply Base Report:

Warmeston OÜ - Sauga production Re-assessment

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 OÜ - Sauga production
Producer address:	Kilksama küla Tori vald, 85003 Pärnu maakond, Estonia
SBP Certificate Code:	SBP-01-08
Geographic position:	58.438600, 24.576200
Primary contact:	Viljo Aros, +372 528 8250, viljo.aros@warmeston.ee
Company website:	www.warmeston.ee
Date report finalised:	30 Jan 2026
SBR reporting period from:	01 Jan 2025
SBR reporting period to:	31 Dec 2025
Name of the Certification Body:	Preferred by Nature OÜ
Certification Body Approval date:	16 Feb 2026
SBP Standard(s) used:	SBP Standard 1: Feedstock Compliance v2.0, SBP Standard 2: Feedstock Verification v2.0, SBP Standard 4: Chain of Custody v2.0, SBP Standard 5: Collection and Communication of Data v2.0, Instruction Document 1A: SBP Requirements for Primary Feedstock from Trees Outside Forests (TOF) v1.0, Instruction Document 5E: Collection and Communication of Energy and Carbon data. v2.1, Instruction Document EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413 v2.0
Feedstock origin (countries)	Estonia (Estonia), Latvia (Latvia), Lithuania (Lithuania), Finland (Finland), Sweden (Sweden), Norway (Norway), Italy (Italy), Croatia (Croatia), Poland (Poland), United States (Minnesota, Wisconsin), Ukraine (Ukraine)
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 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: *WB 1.1 Wood pellets, WB 2.1 Wood chips*

Number of employees: *80*

Annual maximum production capacity (metric tonnes): *220000*

Number of direct feedstock suppliers: *58*

Approximate number of feedstock sub-suppliers: *60*

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 classified as "low risk" 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

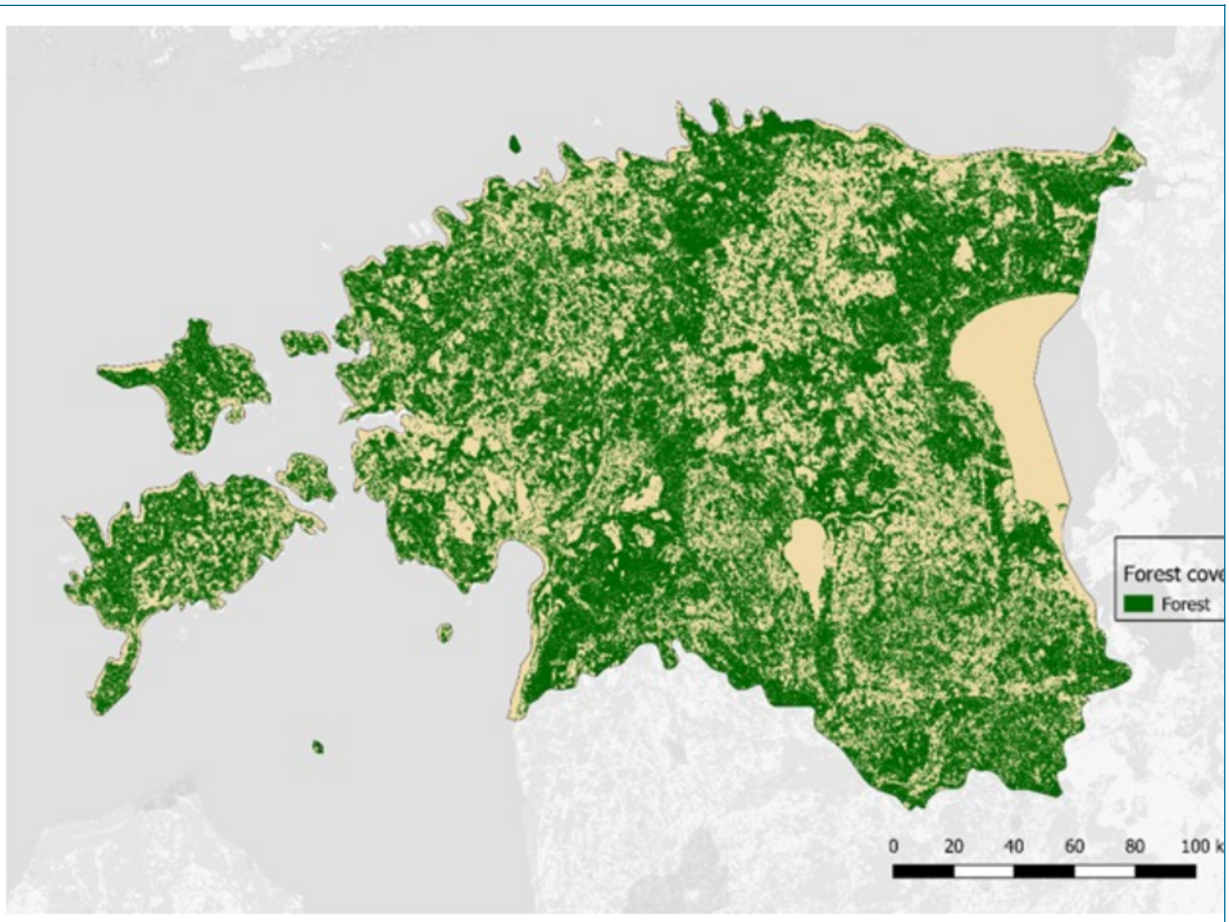
Guidance: Tables below have been generated automatically for each sourcing country based on the selection of 'Feedstock origin (countries)' in section 1 above.

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	Estonia
Area/Region	Estonia
Exclusions	N/A
Feedstock types	Primary, Processing residues1
Feedstock Product Groups	Forest feedstock (1A), Trees outside forest (TOF) - Urban and landscape feedstock (2A), Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock , SBP Controlled feedstock
Is the forest managed to supply energy and non-energy markets?	Yes - Majority

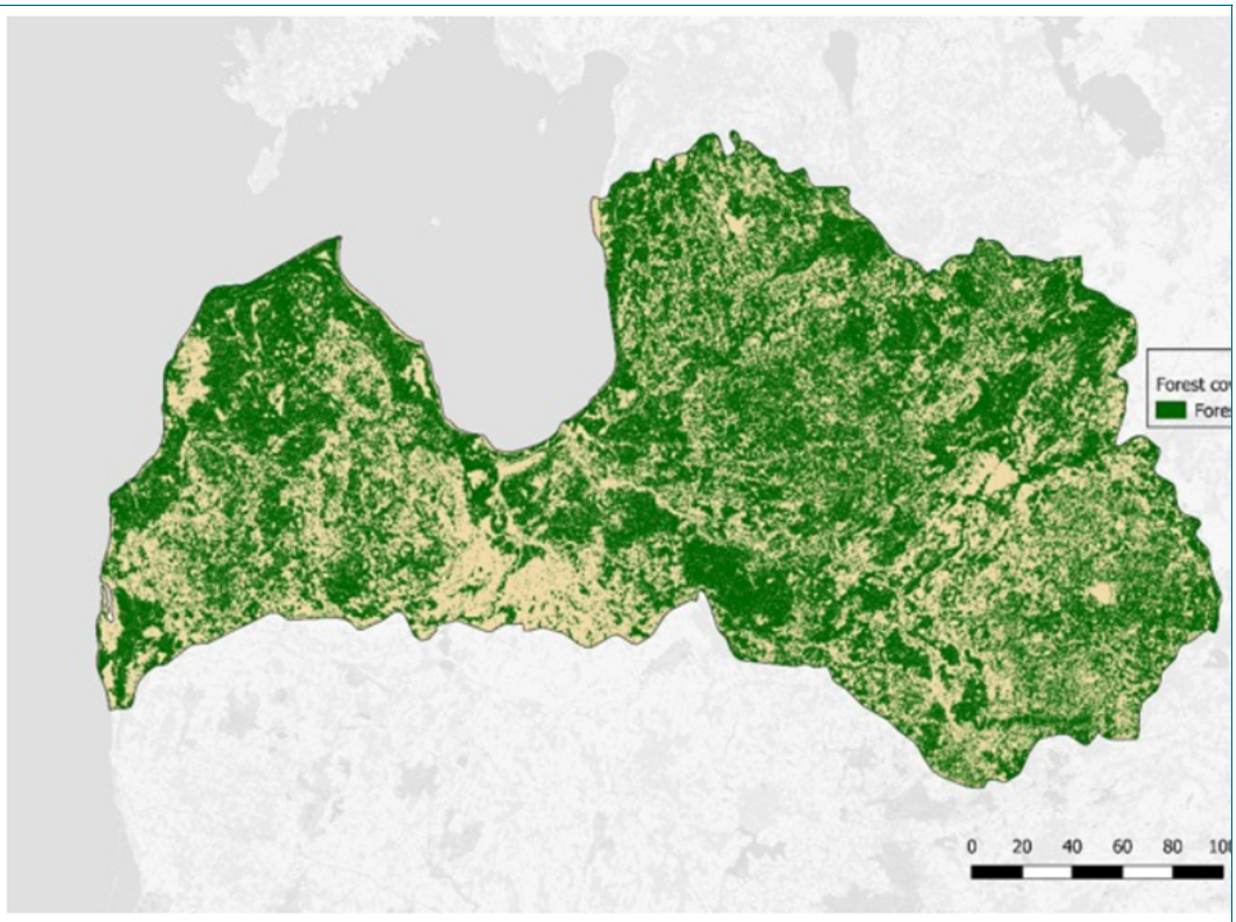
For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?	Yes - Majority
Risk assessment(s)	Yes – Regional Risk Assessment (RRA) used, Yes – Biomass Producer's own risk assessment used (SBE)
Provide a concise summary of why a SBE was determined to be required or not required here:	
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.	
Feedstock types included in SBE:	Primary, Processing residues1
Includes EU RED SBE:	Yes
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	Yes
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	2.4380
Map(s) of the Supply Base area:	



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.

Country	Latvia
Area/Region	Latvia
Exclusions	N/A
Feedstock types	Primary, Processing residues1
Feedstock Product Groups	Forest feedstock (1A), Trees outside forest (TOF) - Urban and landscape feedstock (2A), Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock , SBP Controlled feedstock
Is the forest managed to supply energy and non-energy markets?	Yes - Majority
For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?	Yes - Majority

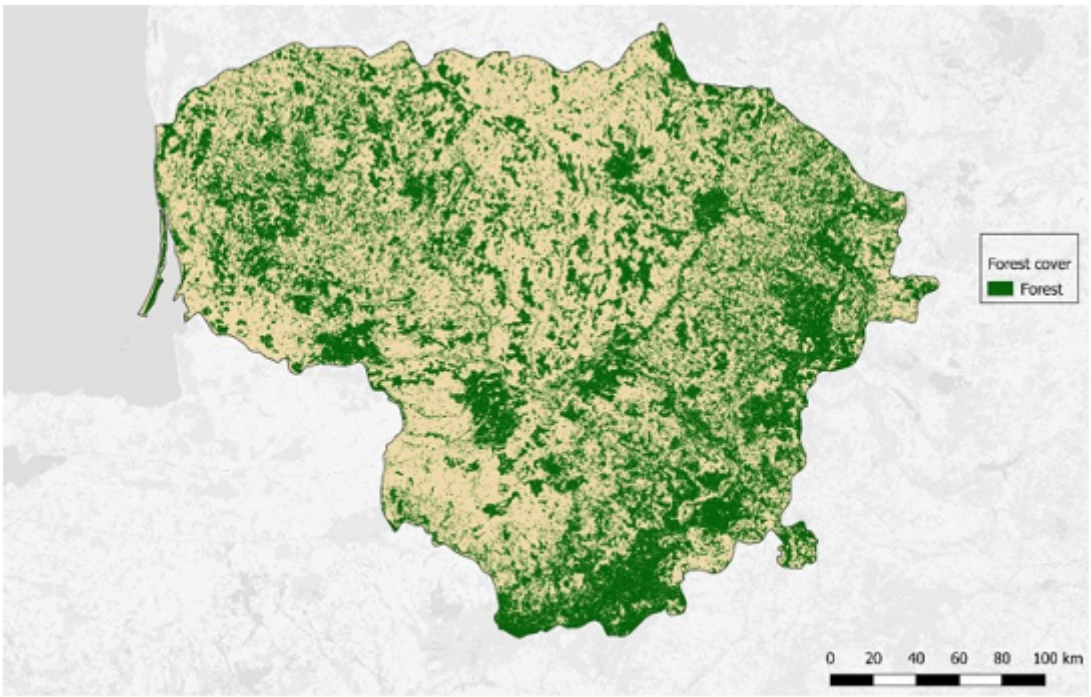
Risk assessment(s)	Yes – Regional Risk Assessment (RRA) used, Yes – Biomass Producer's own risk assessment used (SBE)
Provide a concise summary of why a SBE was determined to be required or not required here:	
An SBE was conducted because the proportion of processing residues certified under an SBP-recognized certification scheme available around the factory is insufficient to meet the demand for SBP-compliant biomass.	
Feedstock types included in SBE:	Primary, Processing residues1
Includes EU RED SBE:	Yes
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	Yes
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	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 CartoD under CC BY 3.0. Data by OpenStreetMap, under ODbL.

Country	Lithuania
Area/Region	Lithuania
Exclusions	Lithuania
Feedstock types	Processing residues1
Feedstock Product Groups	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)	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:	
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.	
Feedstock types included in SBE:	N/A
Includes EU RED SBE:	No
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):	2.2010
Map(s) of the Supply Base area:	



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.

Country	Finland
Area/Region	Finland
Exclusions	N/A
Feedstock types	Processing residues1

Feedstock Product Groups	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)	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:	
Finland enters the supply base through the residues of Estonian wood processors sourcing a part of its feedstock from there and one supplier delivering sawdust directly from Finland. 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.	
Feedstock types included in SBE:	N/A
Includes EU RED SBE:	No
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):	22.4090
Map(s) of the Supply Base area:	

Country	Sweden
Area/Region	Sweden
Exclusions	N/A
Feedstock types	Processing residues1
Feedstock Product Groups	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	Yes - Majority

retain, restock or encourage natural regeneration within 5 years of felling?	
Risk assessment(s)	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:	
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.	
Feedstock types included in SBE:	N/A
Includes EU RED SBE:	No
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):	27.9800
Map(s) of the Supply Base area:	


Harstad
Narvik
Kiruna
Bodø
Luleå
Trondheim
Sweden
Ålesund
Norway
Gulf of Bothnia
Bergen
Turku
Oslo
Uppsala
Stockholm
Stavanger
Baltic Sea
Gothenburg
Riga

Country	Norway
Area/Region	Norway
Exclusions	N/A
Feedstock types	Processing residues1
Feedstock Product Groups	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)	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:	
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.	
Feedstock types included in SBE:	N/A
Includes EU RED SBE:	No
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):	12.1800
Map(s) of the Supply Base area:	

Country	Italy
Area/Region	Italy
Exclusions	N/A
Feedstock types	Processing residues1
Feedstock Product Groups	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)	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:	
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.	
Feedstock types included in SBE:	N/A
Includes EU RED SBE:	No
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):	11.4320
Map(s) of the Supply Base area:	

Country	Croatia
Area/Region	Croatia
Exclusions	N/A
Feedstock types	Processing residues1
Feedstock Product Groups	Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock , SBP Controlled feedstock

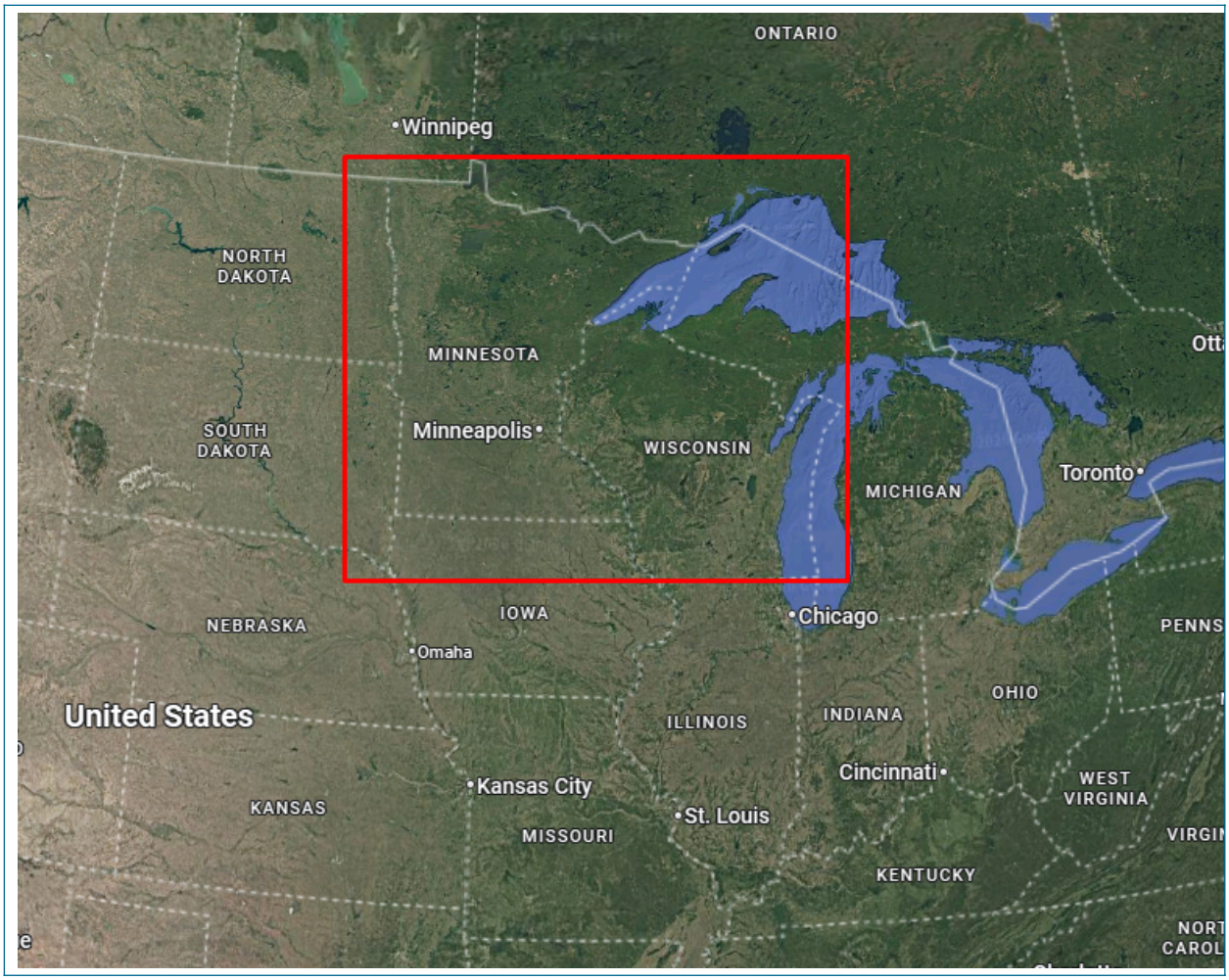
Is the forest managed to supply energy and non-energy markets?	Yes - Majority
For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?	Yes - Majority
Risk assessment(s)	N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme
Provide a concise summary of why a SBE was determined to be required or not required here:	
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.	
Feedstock types included in SBE:	N/A
Includes EU RED SBE:	No
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):	2.5570
Map(s) of the Supply Base area:	

Country	Poland
Area/Region	Poland
Exclusions	N/A
Feedstock types	Processing residues1
Feedstock Product Groups	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)	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:	
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.	
Feedstock types included in SBE:	N/A
Includes EU RED SBE:	No
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):	9.4830
Map(s) of the Supply Base area:	

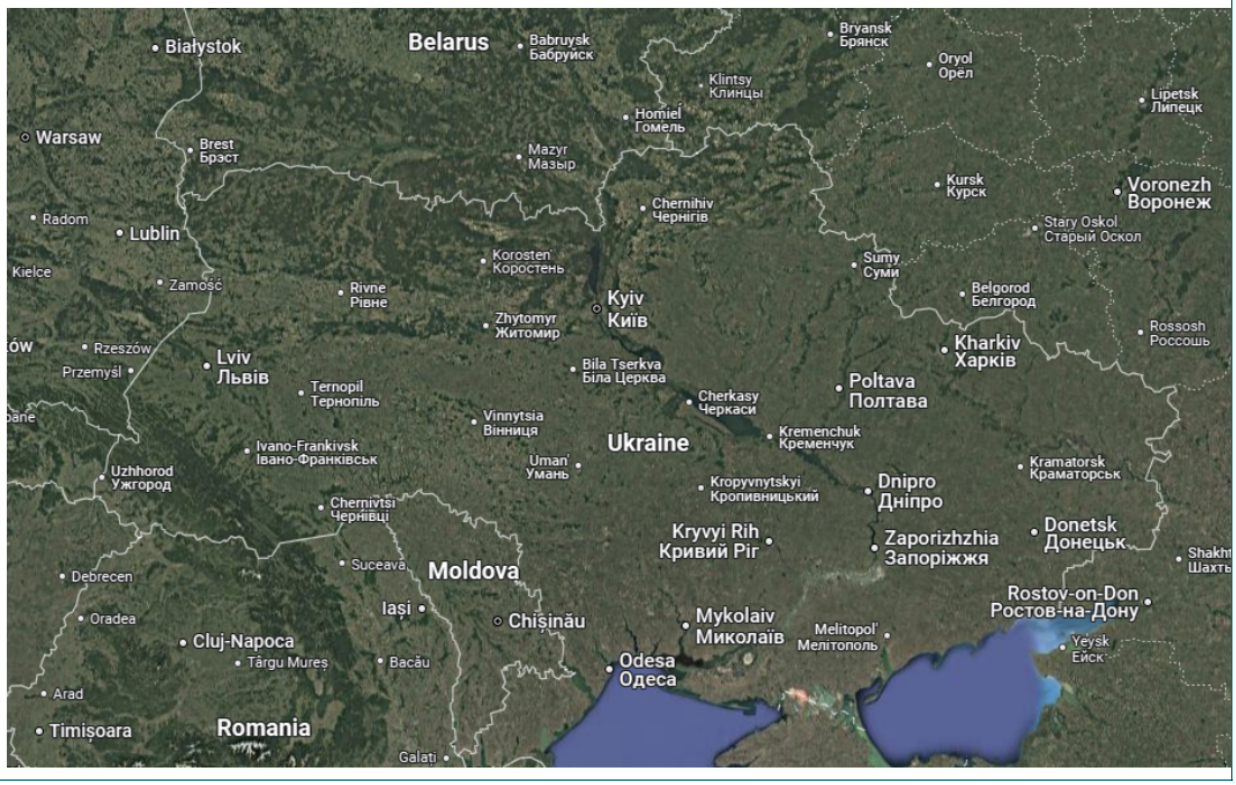
Country	United States
Area/Region	Minnesota, Wisconsin
Exclusions	
Feedstock types	Processing residues1
Feedstock Product Groups	Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock , SBP Controlled feedstock
Is the forest managed to supply energy and non-energy markets?	Yes - 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)	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:	
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.	
Feedstock types included in SBE:	N/A
Includes EU RED SBE:	No
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):	13.4400
Map(s) of the Supply Base area:	



Country	Ukraine
Area/Region	Ukraine
Exclusions	
Feedstock types	Processing residues1
Feedstock Product Groups	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)	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.	
Feedstock types included in SBE:	N/A
Includes EU RED SBE:	No
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):	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 (%)**: 75.06

f. **Softwood (i.e. coniferous trees): specify proportion of feedstock from (%):** 24.94

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 (%):** 100.00

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 tonnes

m. **Volume of processing residues feedstock:** 200,000-400,000 tonnes
Physical form of the feedstock: Chips, Sawdust, Offcuts

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

50 % FSC

6 % PEFC

o. **Volume of post-consumer feedstock:** 0
Physical form of the feedstock: Chips, Sawdust, Offcuts

p. **Estimated amount of EU RED-compliant sustainable feedstock that could be collected annually by the BP:** 400000 tonnes

q. What is the estimated amount of EU RED-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 an applying a conversion factor of 50% for the remaining volume gives an estimation for the amount of Industry residues. Since the RED sustainability requirements do not pose significant constraints on the harvesting volumes conservatively 90% of this volume can be considered as RED compliant. In Latvia the sustainable harvesting rate for RED-compliance is around 15 000 000 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 sustainability requirements this volume can be considered as RED. 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.

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.

For the risk assessment and risk mitigation measures related to TOF 2A material, we rely on the SBP-approved

a. SBP Regional Risk Assessment – Estonia and SBP Regional Risk Assessment Latvia as well as

b. SBP Estonia RED III Level A Risk Assessment, version 1.1 and Latvian RED III Level A Risk assessment

Warmeston's SBP compliant primary feedstock is sourced from certified and uncertified forests. A small portion of feedstock could be sourced from cleaning process of infrastructure objects and from cleaning process of agricultural land which fell under the category Trees outside forest (TOF) - Urban and landscape feedstock (2A)

Biomass from agricultural land is not sourced as part of the agricultural activity but as cleaning the agricultural land (old hayland and unused fields) from bushes and young trees. In Estonia no legislation is regulating such cleaning process (except protected habitats where Nature conservation act and conditions set by Board of Environment must be followed). In Latvia there are some regulations, but there are mostly no specific legal acts regulating this type of land management, except in cases related to protected habitats, where the conditions set by the Nature Conservation Agency and the State Environmental Service must be observed.

Such removal of bushes and young trees is done with forestry machinery, and it contains only cutting the material above the ground. Removal of roots is not part of that process. Same practices are implemented as it's done in the forest. Also, same origin related data is collected as it is done with forest biomass.

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 9 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.

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.

Country: Estonia	
Area/sub-scope: Estona	
Risk Assessment used:	
	☐SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☒SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim

	☐SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.1.1 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.	
Description of the specific risk:	
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.	
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 be independent and licences experts. Sourcing is avoided if expert reviews is not available or an precense of a HCV is confirmed within the harvesting site.
6. See outcome nr 5.
7. Suppliers' and sub-suppliers' knwoledge 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:

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

Indicator with specified risk:

2.1.2 Threats to and impacts on the identified key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified and evaluated.

Description of the specific risk:

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 be independent and licences experts. Sourcing is avoided if expert reviews is not available or an precense of a HCV is confirmed within the harvesting site. 6. See outcome nr 5. 7. Suppliers' and sub-suppliers' knwoledge 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:	
	☐SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim

	☒SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment

Indicator with specified risk:

2.1.3 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.

Description of the specific risk:

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".

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 be independent and licences experts. Sourcing is avoided if expert reviews is not available or an precense of a HCV is confirmed within the harvesting site. 6. See outcome nr 5. 7. Suppliers' and sub-suppliers' knwoledge 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:	
	☐SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☒SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
3.2.3 feedstock shall not be sourced from forest areas in the Supply Base which, according to local definitions or norms, are classified as having combined attributes of high carbon stocks and high conservation value (HCV).	
Description of the specific risk:	
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.	
Mitigation measure:	
To mitigate the risk of sourcing primary feedstock from forest areas classified as having both high carbon stock and high conservation value (HCV), Warmeston applies a comprehensive risk management approach	

based on the findings of the Regional Risk Assessments (RRAs).

1. All suppliers undergo a supplier approval process, during which suitability to Warmeston's supply base is assessed. Suppliers must sign a code of conduct covering requirements on feedstock sourcing and submit a declaration of feedstock origin covering sub-suppliers and countries of origin.
2. Guidance is provided to SBE suppliers regarding identified threats to the forests and areas of high conservation values and management measures to be implemented to mitigate these risks.
3. The origin of all feedstock deliveries (including supplier, feedstock type, delivered volume, certification status, and origin of feedstock) is verified at the factory gate.
4. The origin of primary feedstock is validated against the 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 be independent and licences experts. Sourcing is avoided if expert reviews is not available or an precense of a HCV is confirmed within the harvesting site.
6. See outcome nr 5.
7. Suppliers' and sub-suppliers' knwoledge 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:	
	☐SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☒SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.1.1 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.	
Description of the specific risk:	
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 ofthe 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 (Unio crassus, Osmoderma eremita, Barbastella barbastellus) 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' knwoledge 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:

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

Indicator with specified risk:

2.1.2 Threats to and impacts on the identified key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified and evaluated.

Description of the specific risk:

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' knwoledge 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:	
	☐SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☒SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.1.3 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.	
Description of the specific risk:	
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:	
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' knwoledge 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:

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

Indicator with specified risk:

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

Description of the specific risk:

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.

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.

Mitigation measure:

To mitigate the risk of sourcing primary feedstock from forest areas classified as having both high carbon stock and high conservation value (HCV), Warmeston applies a comprehensive risk management approach based on the findings of the Regional Risk Assessments (RRAs).

1. All suppliers undergo a supplier approval process, during which suitability to Warmeston's supply base is assessed. Suppliers must sign a code of conduct covering requirements on feedstock sourcing and submit a declaration of feedstock origin covering sub-suppliers and countries of origin.
2. Guidance is provided to SBE suppliers regarding identified threats to the forests and areas of high conservation values and management measures to be implemented to mitigate these risks.
3. The origin of all feedstock deliveries (including supplier, feedstock type, delivered volume, certification status, and origin of feedstock) is verified at the factory gate.
4. The origin of primary feedstock is validated against the Ozols database 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' knwoledge 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:

SBE 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 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.

RED-3 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: 39 (19EE + 20LV)
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.

RED3 RMP ENGAMENENT 2 and TOF
Biomass Producer's stakeholder engagement start date: 31.12.2025
Biomass Producer's stakeholder engagement end date: 30.01.2026
Total number of stakeholders contacted: 39 (19EE + 20LV)
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 December 31, 2025, to January 30, 2026. Stakeholders were invited to provide feedback via email to the designated contact person, Viljo Aros.
- Information Availability: Relevant documents, was provided by e-mail and attachments.
- 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, no responses were received.

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, 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: New Supply Base Report (Assessments/reassessments)

Summary of changes: N/A

Name	Viljo Aros
Title	Management representative
Date of report approval	30 Jan 2026

Annex 1: Detailed findings for Supply Base Evaluation indicators

Estonia Estonia	Indicator
1.1.1	Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.
Supply Base Verifiers	N/A
Risk Rating justification	Annex 1 covers TOF material only. For TOF material the same SBP regional risk assessments are used as for forest material. Warmeston's SBP compliant primary feedstock is sourced from certified and uncertified forests. A small portion of feedstock could be sourced from cleaning process of infrastructure objects and from cleaning process of agricultural land which fell under the category Trees outside forest (TOF) - Urban and landscape feedstock (2A) Biomass from agricultural land is not sourced as part of the agricultural activity but as cleaning the agricultural land (old hayland and unused fields) from bushes and young trees. In Estonia no legislation is regulating such cleaning process (except protected habitats where Nature conservation act and conditions set by Board of Environment must be followed). In Latvia there are some regulations, but there are mostly no specific legal acts regulating this type of land management, except in cases related to protected habitats, where the conditions set by the Nature Conservation Agency and the State Environmental Service must be observed. Such removal of bushes and young trees is done with forestry machinery, and it contains only cutting the material above the ground. Removal of roots is not part of that process. Same practices are implemented as it's done in the forest. Also, same origin related data is collected as it is done with forest biomass.
Risk Rating	Low Risk

Latvia Latvia	Indicator
1.1.1	Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.
Supply Base Verifiers	N/A
Risk Rating justification	Annex 1 covers TOF material only. For TOF material the same SBP regional risk assessments are used as for forest material. Warmeston's SBP compliant primary feedstock is sourced from certified and uncertified forests. A small portion of feedstock could be sourced from cleaning process of infrastructure objects and from cleaning process of agricultural land which fell under the category Trees outside forest (TOF) - Urban and landscape feedstock (2A).

	Biomass from agricultural land is not sourced as part of the agricultural activity but as cleaning the agricultural land (old hayland and unused fields) from bushes and young trees. In Estonia no legislation is regulating such cleaning process (except protected habitats where Nature conservation act and conditions set by Board of Environment must be followed). In Latvia there are some regulations, but there are mostly no specific legal acts regulating this type of land management, except in cases related to protected habitats, where the conditions set by the Nature Conservation Agency and the State Environmental Service must be observed. Such removal of bushes and young trees is done with forestry machinery, and it contains only cutting the material above the ground. Removal of roots is not part of that process. Same practices are implemented as it's done in the forest. Also, same origin related data is collected as it is done with forest biomass.
Risk Rating	Low Risk

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

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

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

Latvia	**Indicator**

Latvia	
1.1.3	Feedstock shall be legally harvested, supplied and produced, including in compliance with CITES, EUTR and other applicable legal trade requirements.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Latvia Latvia	Indicator
1.1.4	Payments for harvest rights and feedstock, including duties, relevant royalties and taxes related to timber harvesting shall be complete and up-to-date.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

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

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

Latvia Latvia	Indicator
1.1.5	There shall be adequate protection of the Supply Base from unauthorised and illegal activities, such as illegal logging, mining, and encroachment.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Latvia Latvia	Indicator
2.1.1	Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.
Supply Base Verifiers	Same risk mitigation activities apply as described in SBR section 3 "Risk management measures", indicator 2.1.1.
Risk Rating justification	Forest land risk rating is used. See the justification under 1.1.1.
Risk Rating	Specified Risk

Estonia Estonia	Indicator
2.1.1	Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.
Supply Base Verifiers	Same risk mitigation activities apply as described in SBR section 3 "Risk management measures", indicator 2.1.1.
Risk Rating justification	Forest land risk rating is used. See the justification under 1.1.1.
Risk Rating	Specified Risk

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

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

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

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

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

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

Latvia Latvia	Indicator
2.2.2	Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.

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

Estonia **Estonia**	**Indicator**
2.2.2	Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia **Estonia**	**Indicator**
2.2.3	Soil quality in the Supply Base shall be maintained or enhanced
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Latvia **Latvia**	**Indicator**
2.2.3	Soil quality in the Supply Base shall be maintained or enhanced
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

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

Estonia **Estonia**	**Indicator**

2.2.4	Where the removal of harvest forest residues and/or stumps occurs, this shall not lead to irreversible negative impacts to the ecosystem.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

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

Latvia **Latvia**	**Indicator**
2.2.5	Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Latvia **Latvia**	**Indicator**
2.2.6	Air emissions shall comply with national legislation or in the absence of national legislation with industry best practice.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

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

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

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

Latvia Latvia	Indicator
2.2.8	Waste shall be disposed of in an environmentally appropriate manner.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

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

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

Risk Rating	Low Risk

Latvia **Latvia**	**Indicator**
2.2.9	Harvesting levels shall be justified as to how they can be sustained with reference to inventory and growth data for the Supply Base.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Latvia **Latvia**	**Indicator**
2.2.10	Harvested areas shall be regenerated
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia **Estonia**	**Indicator**
2.2.10	Harvested areas shall be regenerated
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia **Estonia**	**Indicator**
2.2.11	The impacts of natural processes such as fires, pests and diseases shall be managed.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Latvia **Latvia**	**Indicator**
2.2.11	The impacts of natural processes such as fires, pests and diseases shall be managed.
Supply Base Verifiers	N/A
Risk Rating justification	N/A

Risk Rating	Low Risk

Latvia **Latvia**	**Indicator**
2.2.12	Genetically modified trees shall not be used.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia **Estonia**	**Indicator**
2.2.12	Genetically modified trees shall not be used.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

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

Latvia **Latvia**	**Indicator**
3.1.1	LULUCF emissions shall be accounted for through one of the following routes: Route A Feedstock may be sourced from a country of origin which is party to the Paris Agreement, and which has submitted a Nationally Determined Contribution to the United Nations Framework Convention on Climate Change (UNFCCC) covering carbon

	emissions and removals from agriculture, forestry and land use which ensure the changes in carbon stock associated with biomass harvest are counted towards the country's commitment to reduce or limit greenhouse gas emissions, or Route B Feedstock may be sourced from a country of origin which is party to the Paris Agreement and has national or sub-national laws in place (developed in accordance with Article 5 of the Paris Agreement and applicable in the area of harvest), to conserve and enhance carbon stocks and sinks, and provided there is evidence that reported LULUCF-sector emissions do not exceed removals, or Route C Feedstock may be sourced from a Supply Base where an assessment demonstrates that both the carbon stock is stable, and the forests' capacity to act as a carbon sink is stable or increasing over the long term.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

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

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

Estonia **Estonia**	**Indicator**
3.2.2	Primary feedstock shall not be sourced from forest areas where site productivity is low and, according to local definitions or norms, the areas are classified as low-productive or

	difficult to regenerate.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

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

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

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

Estonia **Estonia**	**Indicator**
3.3.1	Feedstock sourcing shall be in compliance with the principles of cascading use, high quality stem wood shall not be used as feedstock if it is in substantial demand for long-lived products in the Supply Base.

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

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

Estonia **Estonia**	**Indicator**
4.1.1	Freedom of association and the right to collective bargaining shall be respected in the workplace.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Latvia **Latvia**	**Indicator**
4.1.1	Freedom of association and the right to collective bargaining shall be respected in the workplace.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Latvia **Latvia**	**Indicator**
4.1.2	Forced or compulsory labour shall not be used.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia	**Indicator**

Estonia	
4.1.2	Forced or compulsory labour shall not be used.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Estonia	Indicator
4.1.3	Child labour shall not be used.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Latvia Latvia	Indicator
4.1.3	Child labour shall not be used.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Latvia Latvia	Indicator
4.1.4	Workers shall not be discriminated in hiring, remuneration, access to training, promotion, termination or retirement.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

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

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

Latvia Latvia	Indicator
4.1.5	Wages paid to workers shall meet or exceed the legal minimum wage or where there is no statutory minimum wage industry norms shall be met or exceeded
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Latvia Latvia	Indicator
4.1.6	Working hours shall comply with legal requirements.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Estonia	Indicator
4.1.6	Working hours shall comply with legal requirements.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

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

Latvia Latvia	Indicator
4.1.7	Workers shall have access to health care provisions, sickness benefits, retirement benefits, invalidity benefits, death benefits, and workers' compensation
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

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

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

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

Latvia Latvia	Indicator
4.1.9	Mechanisms shall be in place for resolving grievances and disputes in the workplace.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Latvia Latvia	Indicator
4.1.10	Safeguards shall be put in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Estonia	Indicator
4.1.10	Safeguards shall be put in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Estonia	Indicator
4.2.1	Negative social and community impacts shall be identified and avoided.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Latvia Latvia	Indicator
4.2.1	Negative social and community impacts shall be identified and avoided.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Latvia Latvia	Indicator
4.2.2	Feedstock sourcing shall positively contribute to the local economy, including employment.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Estonia Estonia	Indicator
4.2.2	Feedstock sourcing shall positively contribute to the local economy, including employment.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

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

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

Latvia Latvia	Indicator
4.2.4	Legal, customary, and traditional tenure and use rights of Indigenous Peoples and local communities related to the Supply Base shall be identified, documented, and respected.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

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

Risk Rating	Low Risk

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

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

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

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

Estonia Estonia	Indicator

4.2.7	Designated cultural heritage sites shall be preserved.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Latvia **Latvia**	**Indicator**
4.2.7	Designated cultural heritage sites shall be preserved.
Supply Base Verifiers	N/A
Risk Rating justification	N/A
Risk Rating	Low Risk

Annex 2: EU RED Supply Base Evaluation

Countries where EU RED Supply Base Evaluation is used	
Country	Estonia
Area	Estonia
Sustainable harvesting criteria 29(6)	
(i) The legality of harvesting operations	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	N/A
(ii) Forest regeneration of harvested areas	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	N/A
(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grasslands, heathland and peatlands, are protected with the aim of preserving biodiversity and preventing habitat destruction, unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	N/A
(iv) that harvesting is carried out considering the maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth forests as defined in the country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located, and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with requirements to use logging systems that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and habitats	

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	**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. **Harvesting of Primary Forest and Old Growth Forest (OGF)** 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 Estonia v2.0" are applied to exclude biomass from primary and old growth forests.
(v) That harvesting maintains or improves the long-term production capacity of the forest.	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	N/A
(vi)[1] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. *Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:* *(a) **primary forest** and other wooded land and **old growth forest,** namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located. If there is no definition of **old growth forest** at the national level, then the following definition shall apply: A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.*	
Type of Risk Assessment used	☐Level A – proof at national or sub-national level ☒Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	**Harvesting of Primary Forest and Old Growth Forest (OGF)** 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 Estonia v2.0" are applied to prevent sourcing from primary and old-growth forests.
(vi)[2] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses	

referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. *Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:* *(b) **highly biodiverse forest** and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.*	
Type of Risk Assessment used	☐Level A – proof at national or sub-national level ☒Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	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 Estonia v2.0" are applied to prevent sourcing from highly biodiverse forests.
(vi)[3] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. *Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:* *(d) **highly biodiverse grassland** spanning more than one hectare that is: (i) natural, namely grassland that would remain grassland in the absence of human intervention and that maintains the natural species composition and ecological characteristics and processes; or (ii) non-natural, namely grassland that would cease to be grassland in the absence of human intervention and that is species-rich and not degraded and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the harvesting of the raw material is necessary to preserve its status as highly biodiverse grassland.*	
Type of Risk Assessment used	☒Level A – proof at national or sub-national level ☐Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	N/A
(vi)[4] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. *Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:* *(e) **heathland** - Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).*	
Type of Risk Assessment used	☐Level A – proof at national or sub-national level ☒Level B – management system at forest sourcing area level

Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	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 Estonia v2.0" are applied to prevent sourcing from highly biodiverse forests.
(vi)[5] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. *Article 29 (4): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status: (a)* ***wetlands,*** *namely land that is covered with or saturated by water permanently or for a significant part of the year (NOTE: Evidence of verification of wetlands should reflect seasonal changes within a year).*	
Type of Risk Assessment used	☒Level A – proof at national or sub-national level ☐Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	N/A
(vi)[6] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. *Article 29 (5): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was* ***peatland*** *in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.*	
Type of Risk Assessment used	☐Level A – proof at national or sub-national level ☒Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	To stop further drainage of natural peatlands and to continue peat extraction preferably in already drained and degraded areas until the resource is exhausted and the area is restored, the Minister of the Environment established the regulation on 27 December 2016 titled "List of peatlands damaged and abandoned by mining and suitable for extraction." Residual bogs that, according to surveys, no longer have extractable peat reserves must be restored. Residual bogs are revalued by transforming them into wetlands, creating conditions for peat formation, agriculture, forestry, or other uses. Under SBP's RED-II risk assessment for Estonia the indicator (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) an Bog woodlands *91D0 and monitors and avoids material which has been harvested based on expansion of peat extraction areas.
(vii) that installations producing biomass fuels from forest biomass, issue a statement of assurance, underpinned by company-level internal processes, for the purpose of the audits conducted pursuant to Article 30(3), that the forest biomass is not sourced from the lands referred to in point (vi).	
Type of Risk Assessment used	☒Level A – proof at national or sub-national level ☐Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	*Not applicable, requirement only applies to Level A*

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

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	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	Level A for Latvia by Ministry of Agriculture of the Republic of Latvia (RED III)
Level B management system at the level of the forest sourcing area	N/A
(ii) Forest regeneration of harvested areas	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	Level A for Latvia by Ministry of Agriculture of the Republic of Latvia (RED III)

Level B management system at the level of the forest sourcing area	N/A
(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grasslands, heathland and peatlands, are protected with the aim of preserving biodiversity and preventing habitat destruction, unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	Level A for Latvia by Ministry of Agriculture of the Republic of Latvia (RED III)
Level B management system at the level of the forest sourcing area	N/A
(iv) that harvesting is carried out considering the maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth forests as defined in the country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located, and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with requirements to use logging systems that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and habitats	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	Level A for Latvia by Ministry of Agriculture of the Republic of Latvia (RED III)
Level B management system at the level of the forest sourcing area	N/A
(v) That harvesting maintains or improves the long-term production capacity of the forest.	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	Level A for Latvia by Ministry of Agriculture of the Republic of Latvia (RED III)
Level B management system at the level of the forest sourcing area	N/A
(vi)[1] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. *Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:* *(a) **primary forest** and other wooded land and **old growth forest,** namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located. If there is no definition of **old growth forest** at the national level, then the following definition shall apply: A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral*	

developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.	
Type of Risk Assessment used	☒Level A – proof at national or sub-national level ☐Level B – management system at forest sourcing area level
Level A risk assessment description	Level A for Latvia by Ministry of Agriculture of the Republic of Latvia (RED III)
Level B management system at the level of the forest sourcing area	N/A
(vi)[2] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. *Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:* *(b) **highly biodiverse forest** and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.*	
Type of Risk Assessment used	☒Level A – proof at national or sub-national level ☐Level B – management system at forest sourcing area level
Level A risk assessment description	Level A for Latvia by Ministry of Agriculture of the Republic of Latvia (RED III)
Level B management system at the level of the forest sourcing area	N/A
(vi)[3] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. *Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:* *(d) **highly biodiverse grassland** spanning more than one hectare that is: (i) natural, namely grassland that would remain grassland in the absence of human intervention and that maintains the natural species composition and ecological characteristics and processes; or (ii) non-natural, namely grassland that would cease to be grassland in the absence of human intervention and that is species-rich and not degraded and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the harvesting of the raw material is necessary to preserve its status as highly biodiverse grassland.*	
Type of Risk Assessment used	☒Level A – proof at national or sub-national level ☐Level B – management system at forest sourcing area level
Level A risk assessment description	Level A for Latvia by Ministry of Agriculture of the Republic of Latvia (RED III)
Level B management system at the level of the forest sourcing area	N/A
(vi)[4] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.	

Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status: *(e)* ***heathland*** *- Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).*	
Type of Risk Assessment used	☒Level A – proof at national or sub-national level ☐Level B – management system at forest sourcing area level
Level A risk assessment description	Level A for Latvia by Ministry of Agriculture of the Republic of Latvia (RED III)
Level B management system at the level of the forest sourcing area	N/A
(vi)[5] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. *Article 29 (4): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:* *(a)* ***wetlands,*** *namely land that is covered with or saturated by water permanently or for a significant part of the year (NOTE: Evidence of verification of wetlands should reflect seasonal changes within a year).*	
Type of Risk Assessment used	☒Level A – proof at national or sub-national level ☐Level B – management system at forest sourcing area level
Level A risk assessment description	Level A for Latvia by Ministry of Agriculture of the Republic of Latvia (RED III)
Level B management system at the level of the forest sourcing area	N/A
(vi)[6] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. *Article 29 (5): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was* ***peatland*** *in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.*	
Type of Risk Assessment used	☒Level A – proof at national or sub-national level ☐Level B – management system at forest sourcing area level
Level A risk assessment description	Level A for Latvia by Ministry of Agriculture of the Republic of Latvia (RED III)
Level B management system at the level of the forest sourcing area	N/A

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

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

Annex 2a: EU RED II Supply Base Evaluation

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

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

Verification and monitoring of suppliers

Wood industry residues do not need to meet the sustainability requirements of the RED 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 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).

Country: Estonia - Estonia

Not Applicable - only urban and landscape feedstock is used

Country: Latvia - Latvia

Not Applicable - only urban and landscape feedstock is used

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

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