

Supply Base Report: Latesto OÜ

First Surveillance Audit

www.sbp-cert.org



Completed in accordance with the Supply Base Report Template Version 1.3

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: Latesto OÜ
Producer location: Pärnu, Lille 4-201C (Head office – Pääkese pst. 19 Tallinn)
Geographic position: Y: 59.22'3 "/ 59.36488 ; X: 24.37'38 "/ 24.62734
Primary contact: Olga Kulikova, CEO +372 5231139; olga.kulikova@latesto.ee
Company website: www.latesto.ee
Date report finalised: 15/Jan/2019
Close of last CB audit: 27/Oct/2017 Pärnu, Lille 4-201C
Name of CB: SCS Global Services, 2000 Powell Street, Ste.600, Emeryville, CA 94608, USA
Translations from English: Yes
SBP Standard(s) used: Standard 1 v 1.0; standard 2 v 1.0; standard 4 v 1.0; standard 5 v 1.0;
Weblink to Standard(s) used: <https://sbp-cert.org/documents/standards-documents/standards>
SBP Endorsed Regional Risk Assessment: <https://sbp-cert.org/docs/SBP-endorsed-Regional-Risk-Assessment-for-Estonia.pdf>
Weblink to SBE on Company website: www.latesto.ee

Indicate how the current evaluation fits within the cycle of Supply Base Evaluations				
Main (Initial) Evaluation	First Surveillance	Second Surveillance	Third Surveillance	Fourth Surveillance
<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2 Description of the Supply Base

2.1 General description

Latesto OÜ is a privately owned company founded in 2006 based on Estonian capital, whose fields of activity are production and transport of biofuel.

The raw material for the production of woodchips is supplied by Estonian suppliers. This includes, for example, logging companies and forest owners, agricultural cooperatives, timber forest dealers. The primary raw material for the production used are cut round logs, unbarked full trunks, residue of logging operations such as tree tops and branches. The production comes from forests of different site types, ie according to the forest management plan, clear cut, sanitary cut or thinning. It also comes from the land improvement of raw materials and the restoration and renovation of forest and arable land infrastructure. Latesto OÜ has a FSC certificate from 22.05.015. At the time, part of the production input is FSC 100% or FSC Controlled wood.

All primary and secondary raw materials used come from Estonia.

Table 1. Input product groups for the period from 01/01/2018 to 31/12/2018

Input product groups	Estimated percentage,%	Estimated number of suppliers	Tree species,
Verified origin FSC (primary, or firewood, which we self-check)	72%	76	Picea abies, Pinus sylvestris, Betula spp., Populus spp., Alnus spp., Carpinus spp., Fagus spp., Fraxinus spp., Larix spp., Quercus spp., Acer platanoides, Salix spp., Tilia cordata Mill. = Winterlinde (Syn.: T. parvifolia), Eucalyptus spp.
Verified origin FSC (secondary)	0%	0	Picea abies, Pinus sylvestris, Betula spp., Populus spp., Alnus spp., Carpinus spp., Fagus spp., Fraxinus spp., Larix spp., Quercus spp., Acer platanoides, Salix spp., Tilia cordata Mill. = Winterlinde (Syn.: T. parvifolia), Eucalyptus spp.

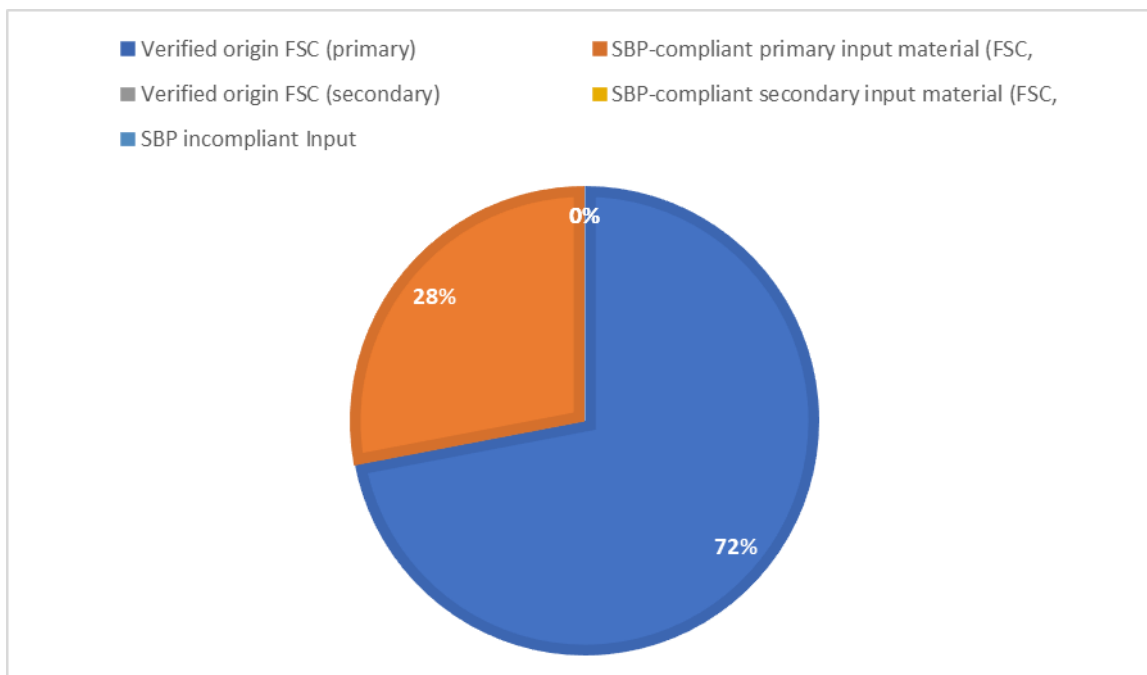
SBP-compliant primary input material (FSC, i.e. SBP Furnace FSC 100%, FSC Mix Credit. Examples: RMK, Lignator, Lemeks)	28%	3	Picea abies, Pinus sylvestris, Betula spp., Populus spp., Alnus spp., Carpinus spp., Fagus spp., Fraxinus spp., Larix spp., Quercus spp., Acer platanoides, Salix spp., Tilia cordata Mill. = Winterlinde (Syn.: T. parvifolia), Eucalyptus spp.
SBP-compliant secondary input material (FSC, for example, 100% log from RMK, and the resulting surfaces in chopped form. 100% FSC processed material residues)	0	0	Picea abies, Pinus sylvestris, Betula spp., Populus spp., Alnus spp., Carpinus spp., Fagus spp., Fraxinus spp., Larix spp., Quercus spp., Acer platanoides, Salix spp., Tilia cordata Mill. = Winterlinde (Syn.: T. parvifolia), Eucalyptus spp.
Input material non-compliant with SBP	0	0	Picea abies, Pinus sylvestris, Betula spp., Populus spp., Alnus spp., Carpinus spp., Fagus spp., Fraxinus spp., Larix spp., Quercus spp., Acer platanoides, Salix spp., Tilia cordata Mill. = Winterlinde (Syn.: T. parvifolia), Eucalyptus spp.

Latesto OÜ's input material profile from 01.01.2018 to 31.12.2018

Table in %.

Class no.		Number of suppliers	Estimated percentage, %
1	Verified origin FSC (primary)	76	72%
2	Verified origin FSC (secondary)	0	0%

3	SBP-compliant primary input material (FSC,	3	28%
4	SBP-compliant secondary input material (FSC,	0	0%
5	SBP incompliant Input	0	0%
	TOTAL:	79	100%



Estonian forest resources

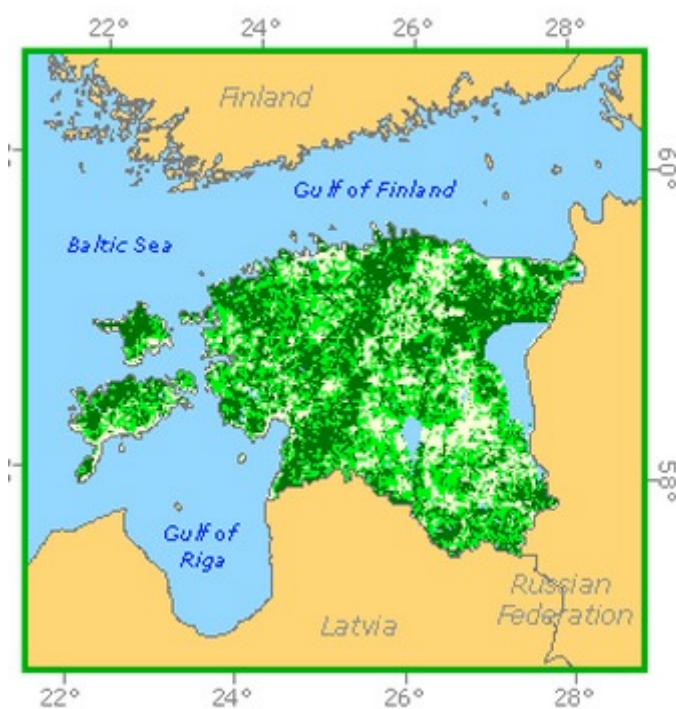
Estonia has been a member of the European Union since 2004. Estonian laws are in line with the legal framework and directives of the European Union. National legislation refers to the international legal framework. Legislation conforms to democratic principles such as the involvement of the parties (1). In Estonia, nearly half of the land is covered with forest, in total about 2.2 million hectares. The principles for using forests and wooded land are defined by law. The Estonian Forestry Development Plan until 2020 (2) defines the strategy and objectives for the protection and sustainable management of forests and wooded land. The sub-units of the Ministry of Environment coordinate and monitor forest management and compliance with legislation in the forestry sector. The Environmental Board implements the national environmental and nature conservation policy, and environmental monitoring is carried out by the Environmental Inspectorate.

According to the Forest Act, forests are divided into managed forests, forests with limited forest management and protected forests. Forests are also divided into private, municipal and state forests. About 40% of the forest and woodland belong to the state (3). State forests are certified according to FSC and PEFC Forest Management and Supply Chain standards. State forests are managed by the State Forest Management Center RMK whose mission is sustainable and efficient management of state forests. For the purpose of

Focusing on sustainable sourcing solutions

forest management planning, continuous monitoring of inventory data and renewal of forest maps are ongoing (4).

In the last decade, the annual felling volume of forests has been 7 to 11 million cbm (5). According to the forestry development plan, the estimated annual increment is 12-15 million cbm,. These figures indicate that forest management is sustainable and that the forestry sector has sufficient margin and potential. In the long run, this is a prerequisite for achieving economic, environmental and social goals.



Legend



Fig. 1 Forest-covered area in Estonia (FAO: <http://www.fao.org/forestry/country/en/est/>)

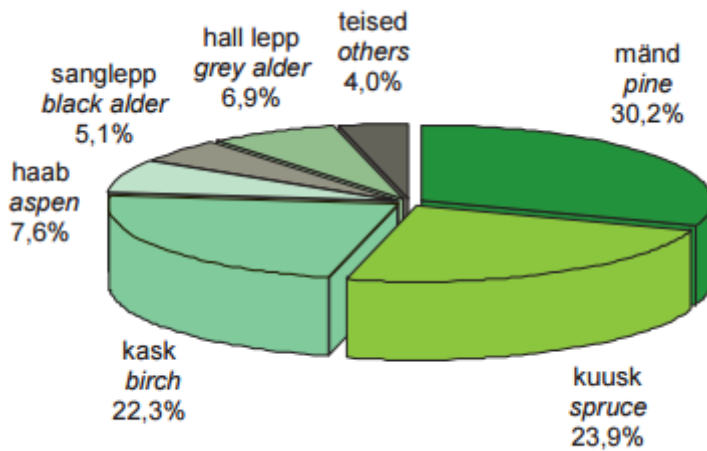


Fig. 2 Breakdown of growing stand by tree species (yearbook "Forest 2014").

For forest management and cutting, a forest management plan has to be drawn up according to which the Environmental Board can issue a logging permit. Relevant data are available in the public database (6).

Protected forests represent 23% of the forested area. Most of the protected forests belong to the state. The Nature Conservation Act regulates the sustainable use of natural resources in preserving biodiversity in forests (7).

Estonia signed CITES (1973) Convention on International Trade in Endangered Species of Wild Fauna and Flora in 1992 (8) and joined the International Union for Conservation of Nature (IUCN) in 2007 (8) and joined the International Union for the Conservation of Nature (IUCN) in the year 2007 (9).

Estonia has no tree species protected by CITES or IUCN that grow naturally.

1 https://europa.eu/european-union/law_en

2 Original title: "Eesti metsanduse arengukava aastani 2020"; approved by Estonian Parliament decision No. 909 OE on February 15 https://www.envir.ee/sites/default/files/elfinder/article_files/mak2020vastuvoetud.pdf

3 <http://www.rmk.ee/organisation/operating-areas>

4 <http://www.rmk.ee/organisation/environmental-policy-of-rmk/certificates>

5 <http://register.keskkonnainfo.ee/envreg/main#HTTTPmmVhWzLVSObhNgxblZbVvf4VidBssw>
(all key figures, graphs and tables are bilingual)

2.2 Actions taken to promote certification amongst feedstock supplier

Latesto OÜ started to buy only certified raw materials from 22 May 2015 with the goal of increasing supply chain transparency and reach almost 100% forest management (FM) certification level. Agreements with suppliers set minimum sustainability requirements: "FSC controlled wood". Non-compliant raw materials are subject to zero tolerance and will not be accepted. The aforementioned raw material suppliers competed in the certification competition and led to a 40% increase in the raw material in Latesto's Forest Management Certificate.

The aforementioned changes in supplier contracts also included habitats of valuable species (VEP). Latesto OÜ has given clear instructions on how suppliers of raw materials could minimize the risks associated with the possible supply of raw materials to key biotopes and only contracted suppliers who implemented VEP risk mitigation measures. The guidelines, along with a brief introduction to the SBP Certification Scheme, were sent to the suppliers of raw materials.

2.3 Final harvest sampling programme

The Estonian Environmental Agency is an agency of the Ministry of the Environment, which is responsible, inter alia, for analyzing cutting types, felling volumes and analyse timber samples. For this, data is collected from RMK, the Environmental Board and forest owners. In addition, statistical surveys are carried out on selected samples in order to obtain additional information. The Environmental Board will regularly disclose these data to the forestry statistical annual report "Mets", which is published since 1994. According to the "Annual Yearbook Forest 2013" (10), the share of firewood is estimated at 24%. This is in line with other sources where the percentage of firewood is given at 20-25% (11).

6 <http://register.metsad.ee/avalik/>

7 <https://www.riigiteataja.ee/en/eli/517062015004/consolide>

8 <http://www.envir.ee/et/cites>

9 <http://www.envir.ee/et/iucn>

10 http://www.keskkonnainfo.ee/files/Mets_2013.pdf

11 <https://www.agri.ee/et/eesmargid-tegevused/biomajandus>
<http://www.eramets.ee/static/files/1356>

2.4 Flow diagram of feedstock inputs showing feedstock type [optional]

Not selected

2.5 Quantification of the Supply Base

Supply Base

a. Supply base (ha): 2.2 million

- b. Form of ownership (ha): state forest 1.09 million; municipal forest 4.2 thousand; private foreste 0,98 million
- c. Type of forest (ha): 2.2 million temperate climate zone forest
- d Forest management method (ha): natural managed forests
- e. Certified forests (ha): FSC certified 1.1 million; PEFC Certified 1.13 million

Raw material

- f Input volume: 341, 426 loose cbm (total volume of wood in cbm)
- g. Primary input material: 341, 426 loose cbm (firewood calculated as chop cbm FSC 100%)
- h of which -
 - Forest holdings that hold SBP recognized forest management certificate - 28%
 - Forest holdings that do not have a SBP recognized forest management certificate - 72%
- Picea abies, Pinus sylvestris, Betula spp., Populus spp., Alnus spp., Carpinus spp., Fagus spp., Fraxinus spp., Larix spp., Quercus spp., Acer platanoides, Salix spp., Tilia cordata Mill. = Winterlinde (Syn .: T. parvifolia), Eucalyptus spp.
- j Primary input material from primeval forests: N / A.
- k Distribution of primary input from Ugric forests according to forest management certificates: N / A
- l Volume of secondary input: 0 loose m3 (amount of chop wood in m3)
- m Third-tier input material: N / A

3 Requirement for a Supply Base Evaluation

SBE completed	SBE not completed
X	<input type="checkbox"/>

Latesto OÜ buys only certified raw materials and quickly increases its certified raw material quantity. Raw material has already been approved by about 28% of forest management certificates and thus meets the requirements of the SBP. Since Estonia has strict forestry laws and Latesto OÜ verifies its suppliers thoroughly, there is no doubt that the controlled raw materials are observable, with a low risk factor and therefore consistent with SBP. The high SBP-certified woodchip% gives greater freedom in storing and selling raw materials.

SBE was added to the scope of the SBP to ensure that all raw materials used by Latesto OU were consistent with SBP. **This SBE was conducted solely for the assessment of raw materials originating in Estonia.**

As the supply base of Latesto OÜ remains strictly within Estonia, the local risk assessment has been approved by the SBP

A fully applicable and additional risk assessment is not required in Estonia.

Latesto OÜ operates on April 22, 2016. a. a risk assessment report that is available in: <https://sbp-cert.org/>

4 Supply Base Evaluation

4.1 Scope

Latesto OÜ carries out the verification of the origin of the supply base through the primary raw material that is stored in Estonia and sold without:

- SBP approved forest management certificate;
- partial sales claim made on the basis of a SBP approved forest management certificate;
- sales claim of the SBP approved supply chain certificate.

In order to hedge risks associated with the primary raw material, the company checks the origin of the material for all supplies. A detailed description of the hedging procedures is provided in Chapter 9 of the supply base report.

4.2 Justification

In checking the origin, Latesto OÜ relies on the Estonian Risk Assessment (2016) approved by the SBP which meets the requirements of SBP Standards 1 and 2. The Estonian Risk Assessment was approved by SBP on April 22, 2016.

Latesto OÜ agrees with all the findings, conclusions and hedging measures outlined in the risk assessment of Estonia and does not independently carry out a new risk assessment.

4.3 Results of Risk Assessment

The risk assessment and mitigation measures presented in this report are based on the Estonian Risk Assessment (2016) approved by the SBP, where the only identified risk was related to Indicator 2.1.2: "The biomass producer has implemented a control system and procedures for identifying the potential risks to forest and high conservation value areas arising from forestry".

Based on Estonian legislation, the protection of habitats of valuable species (VEP) in private forests is voluntary. The private forest owner can choose whether or not he wishes to sign a contract with the state to protect the VEP. In case this contract is concluded, the state pays compensation to the forest owner for the protection of VEP. If the respective agreement is not concluded or it does not end, the owner of the forest can, if it wishes, carry out felling at VEP. VEP is protected in state forests and FSC / PEFC certified forests.

If the material comes from a private forest, it is important to know exactly where it is cut. The VEP database is publicly available and can be used to determine if the forest message (s) indicated on the load sheet overlap with VEP sites. If the VEP is within the forest management unit, but the legal felling is carried out without a forest report, the only acceptable VEP inspection measure is an on-the-spot audit.

All other indicators have been identified by the SBP in the Estonian Risk Assessment (2016) with low risk.

4.4 Results of Supplier Verification Programme

According to clause 14.1 of SBP Standard 2, suppliers approval programs are not implemented as the risk assessment is either "low" or "defined". The need to implement supplier verification programs will be reassessed with the renewal of the Estonian Risk Assessment.

4.5 Conclusion

Based on the information collected during the compilation of the Estonian Risk Assessment, the level of risk corresponding to all SBP indicators was determined. In Estonia, with all exceptions, all indicators had a low risk level. Indicator 2.1.2 was a "specified" risk. "The biomass producer has implemented a control system and procedures for identifying the potential risks to forest and high conservation value from forestry". For this indicator, the identified risk was identified based on the conservation status of key habitats.

It follows from the above that if the risks related to indicator 2.1.2 are hedged in the context of the origin control, the risks related to raw materials originating in Estonia are low and corresponds to the requirements of the SBP-compliant raw material (SBP-compliant feedstock). A more detailed overview of the indicator 2.1.2. related risk mitigation is given in Chapter 9 of the report.

5 Supply Base Evaluation Process

SBE scope was determined according to the raw material profile of Latesto OÜ. The primary supplier list was compiled following an evaluation of the existing suppliers of controlled raw materials and material requirements for SBP. Suppliers were informed of SBP and VEP's risk reduction requirements. Suppliers who were ready to take VEP risk reduction measures, were additionally advised, and instructed in their discussions on how to apply VEP Risk Reduction Measures and document documentation.

After 3 months, the approved suppliers participating in the SBE were asked to describe how the mitigation measures are involved in the internal work processes, including what evidence they are ready to submit and how they are verifying sub-suppliers. Latesto OÜ evaluated the feedback and, if necessary, suggested that the supplier make changes or improvements. An agreement was signed with suppliers of effective measures and reliable evidence, which obliged them to continue to use mitigation measures and to provide evidence if Latesto OÜ so wished.

Latesto OÜ carries out an internal control of all the suppliers of SBE at least every 12 months from the verification of the information received from suppliers. The order of audits is not random - it starts with suppliers with the most controlled quantities of raw materials. If the quantities of the raw materials of different suppliers are equivalent, the first supplier will be audited having more than the second (secondary) raw material.

6 Stakeholder Consultation

This is the second time SBE is published to interest groups. The results of the consultation will be included in the report and will be made public again after 30 days.

6.1 Response to stakeholder comments

N/A

7 Overview of Initial Assessment of Risk

The only identified risk identified in the Estonian Risk Assessment approved by the SBP was indicator 2.1.2: "Identification of potential forest risks related to forest and high conservation value areas and addressing these risks".

For more information, see section 4.3.

Table 1. Overview of results from the risk assessment of all Indicators (prior to SVP)

Indicator	Initial Risk Rating		
	Specified	Low	Unspecified
1.1.1		X	
1.1.2		X	
1.1.3		X	
1.2.1		X	
1.3.1		X	
1.4.1		X	
1.5.1		X	
1.6.1		X	
2.1.1		X	
2.1.2	X		
2.1.3		X	
2.2.1		X	
2.2.2		X	
2.2.3		X	
2.2.4		X	
2.2.5		X	
2.2.6		X	
2.2.7		X	
2.2.8		X	
2.2.9		X	

Indicator	Initial Risk Rating		
	Specified	Low	Unspecified
2.3.1		X	
2.3.2		X	
2.3.3		X	
2.4.1		X	
2.4.2		X	
2.4.3		X	
2.5.1		X	
2.5.2		X	
2.6.1		X	
2.7.1		X	
2.7.2		X	
2.7.3		X	
2.7.4		X	
2.7.5		X	
2.8.1		X	
2.9.1		X	
2.9.2		X	
2.10.1		X	

8 Supplier Verification Programme

8.1 Description of the Supplier Verification Programme

Latesto OÜ did not implement the program for confirmation of suppliers defined in SBP Standard 2. The mitigation measures already applied to the raw material supply chain already in place are enough to minimize the risk described in this report. These mitigation measures (discussed in more detail in Chapter 9) were specifically developed to address the risk area identified in the regional risk assessment ("indicator") (indicator 2.1.2). The measures are also recognized as internal FSC procedures.

By reducing the only "defined" risk associated with the raw material, Latesto OÜ can conclude that the raw material that comes to Latesto OÜ is a low risk factor and thus complies with SBP. The supplier verification program can be implemented when SBE extends across the borders of Estonia or the Estonian Risk Assessment is amended.

8.2 Site visits

The examinations are conducted once every 12 months by the suppliers selected by volumes

8.3 Conclusions from the Supplier Verification Programme

In order to hedge the risk, suppliers are provided with material supplies and confirmation on the accompanying documents from which the material is cut. Before the material is received, VEP will be checked.

9 Mitigation Measures

9.1 Mitigation measures

The mitigation measures described in this chapter apply only to input material that is subject to the Origin Control Procedure (SBE) as described in Chapter 4.1. The CEO of Latesto OÜ is also responsible for the implementation of SBE, which is also the general manager of FSC and SBP certificates.

Primary input

For all supplies of primary input materials stored in Estonia that are not certified by FSC or PEFC, Latesto controls that it has not been stored in key biotopes. Additional control measures (eg FSC-STD-40-005: Standard for testing timber delivered) are implemented as needed. Input material subject to the origin-control procedure must meet at least SBP-approved Controlled Feedstock System (SBP-approved Controlled Feedstock System).

Latesto OÜ uses the accompanying documents, an approved supplier list and public databases (card layers: <http://register.metsad.ee/avalik/> or at least twice a year, updated by the competent authority, the Estonian Environmental Agency, which manages the VEP databases) to ensure that the raw materials delivered are not stored in the VEP areas. In the framework of the origin control procedure, the following checks are carried out at the reception of the raw material and upon entering the database:

1. Has the seller signed a confirmation that you are not supplying the raw materials that were collected from VEPs?
 - 1.1 If yes, go to point 2.
 - 1.2 If not, then the goods can not be accepted.
2. Is it possible to determine the cutting area for the material supplied?
 - 2.1 If yes, move to point 3.
 - 2.2 If not, then the goods can not be accepted.
3. Has the forest notification been issued?
 - 3.1 If yes, move to point 5.
 - 3.2 If not, move to point 4.
4. Felling from non-forestland and forest without a forest notification (but in accordance with the Forest Act).
 - 4.1 If there is no VEP within the provision, the goods may be accepted.
 - 4.2 If there is a VEP within the provision, the SBP-compliant product can not be accepted as worthwhile.
5. Are the allocations specified in the forest notification overlapping the VEP area in the forest register?
 - 5.1 If yes, the SBP-compliant product can not be accepted as worthwhile.
 - 5.2 If not, the goods may be accepted.

All cases where materials from or derived from VEP areas are offered are entered in the relevant register.

9.2 Monitoring and outcomes

Latesto OÜ must register all cases where it has attempted to supply materials from VEP areas or potentially VEP sites and where the supplier has violated the supplier's code of conduct and / or the terms of the purchase agreement. The company ascertains the reasons for the occurrence of these violations. Suppliers who repeatedly and / or deliberately violating these conditions and do not agree to take further steps to prevent the material from being stored at key biotopes will terminate the cooperation by the latest implementation of FSC-STD-40-005 V3-0.

The results of this monitoring and the general state of the VEP in Estonia will be reviewed in the framework of the SBR annual review.

10 Detailed Findings for Indicators

A detailed overview of each indicator is available on April 22, 2016. a. Issued by the SBP approved by the Estonian Risk Assessment and is available at the following address:

<http://www.sustainablebiomasspartnership.org/documents/risk-assessments/regional-risk-assessments-forthe-baltic-states/estonia>

11 Review of Report

11.1 Peer review

This report has been reviewed by the management of Latesto.

SBR will be made public to all stakeholders and in case of interest or concern, it will be possible to receive feedback.

The SBR is reviewed by the certification before the initial SBR audit.

11.2 Public or additional reviews

N/A.

12 Approval of Report

Consultancy and advice on the definition of forest management issues documented in the Supply Base Report and the SBP Certificate.

The basis for consultation and counseling is documented education.

Estonian University of Life Sciences Diploma no. CD000932 07.12.2011, Tauri Kakko, acquired the "Master of Science in Forestry"

Approval of Supply Base Report by senior management			
Report Prepared by:	<i>Olga Kuliova</i>	Managing Director	03/06/2019
	Name	Title	Date
<p>The undersigned persons confirm that I/we are members of the organisation's senior management and do hereby affirm that the contents of this evaluation report were duly acknowledged by senior management as being accurate prior to approval and finalisation of the report.</p>			
Report approved by:	Jaanus Keerberg	CEO	03/06/2019
	Name	Title	Date
Report approved by:	Tauri Kakko	Adviser	03/06/2019
	Name	Title	Date
Report approved by:	<i>[name]</i>	<i>[title]</i>	<i>[date]</i>
	Name	Title	Date

13 Updates

13.1 Significant changes in the Supply Base

No changes

13.2 Effectiveness of previous mitigation measures

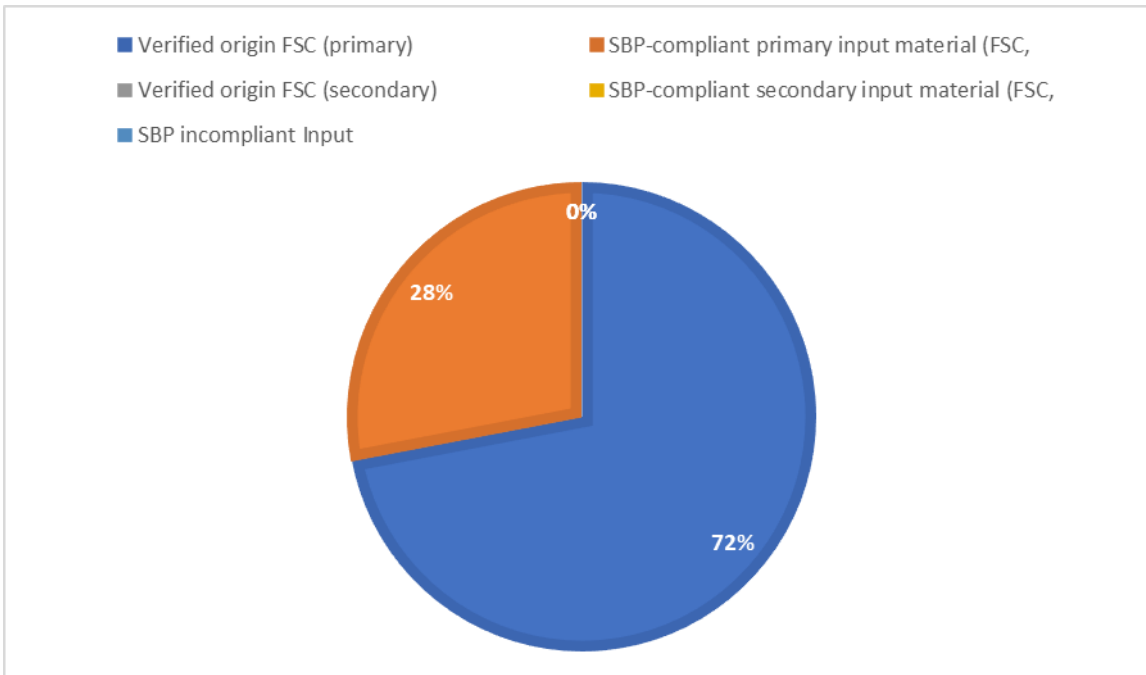
Before we are planning to go for chips collection we are checking in register and also in <https://ee.fsc.org/ee-ee/fsc-sertimine/kontrollitud-puit/vaeariselupaigad>. I will do the training for project managers again.

13.3 New risk ratings and mitigation measures

No changes

13.4 Actual figures for feedstock over the previous 12 months

Verified origin FSC (primary)	72
SBP-compliant primary input material (FSC,	28
Verified origin FSC (secondary)	0
SBP-compliant secondary input material (FSC,	0
SBP in compliant Input	0
	100



13.5 Projected figures for feedstock over the next 12 months

Please be advised that at the moment I cant provide you with the figures, as all tenders is ongoing at the moment. By the end on July I will have the information, how many m3 we are planning to sell 2019/2020