

# SBP

Sustainable Biomass Partnership

## SBP-endorsed Regional Risk Assessment for Lithuania



June 2016

*Document history*

*Published 15 June 2016*

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## Abbreviations

CWTC - FSC Controlled Wood Technical Committee

CITES – Convention on International Trade in Endangered Species or Wild Fauna and Flora

ETUC – European Trade Union Confederation

FM – Forest Management

FMU – Forest Management Unit

FAO – Food and Agriculture Organisation

FSC – Forest Stewardship Council

FSC NRAF – FSC National Risk Assessments Frameworks

GMO – Genetically Modified Organism

HCV – High Conservation Values

ILO – International Labour Organisation

ITUC – International Trade Union Confederation

LFN – Lithuanian Fund for Nature

LTL – Lithuanian Litas

NGO – Non-governmental Organisation

PEFC – Programme for the Endorsement of Forest Certification

SBE – Supply Base Evaluation

SBP – Sustainable Biomass Partnership

VAT – Value Add Tax

WKH – Woodland Key Habitats

## Foreword

Regional Risk Assessments (RRAs) are a key part of SBP's focus on identifying and mitigating risks associated with sustainably sourcing feedstock for biomass pellet and wood chip production. The SBP Framework is designed to provide assurance that feedstock is sourced legally and sustainably.

Feedstock certified at the forest level through FSC<sup>®</sup> or PEFC schemes and feedstock from recycled sources is considered SBP-compliant. All other feedstock must be evaluated using a risk-based approach if it is to count towards an SBP-compliant claim.

Typically, the Biomass Producer – a pellet mill or wood chip producer – is responsible for carrying out the risk assessment and putting in place mitigation measures to manage any specified risks such that the risks can be considered to be controlled and hence low risk. It is the role of an independent, third-party Certification Body, approved by SBP, to check that the feedstock evaluation has been correctly undertaken and that any mitigation measures are being effectively implemented.

The purpose of an RRA is to evaluate an entire geographic region and determine the risks associated with sourcing feedstock for biomass pellet or wood chip production from that region. Thus, the need for individual Biomass Producers to conduct risk assessments is avoided and, therefore, consistency between Biomass Producers' risk assessments guaranteed. The SBP RRA procedure also ensures active engagement with a diverse range of stakeholders in the region.

The SBP Regional Risk Assessment (RRA) Procedure specifies the requirements and processes that must be followed in order to develop and endorse SBP risk assessments of regions or countries.

The Procedure requires that a Working Body (WB) be appointed by SBP to conduct an RRA. Having sufficient, suitably qualified staff to perform the risk assessment, demonstrated competence with the SBP Framework, and relevant knowledge of the language, laws and customs of Lithuania, NEPCon was appointed as the WB responsible for conducting the RRA for Lithuania. A team of NEPCon national and international experts facilitated the risk assessment work. The main coordinator of this risk assessment was NEPCon Forest Management and Chain of Custody lead auditor and project manager, Gerimantas Gaigalas, who has extensive knowledge of the FSC Controlled Wood system. Several stakeholders were consulted in the process and information was obtained from verbal and written public and private sources.

# 1 Introduction

The objective of this piece of work was to conduct a risk assessment according to the Sustainable Biomass Partnership (SBP) standard (Standard 1: Feedstock Compliance Standard, v1.0, 26 March 2015) in Lithuania. Since there is quite large overlap between FSC Controlled Wood risk assessment criteria and SBP criteria this risk assessment relied largely on fieldwork carried out in 2013 by NEPCon and on FSC guidelines for establishing National Risk Assessments Frameworks (NRAF), which was produced by the FSC Controlled Wood Technical Committee (CWTC). The main focus of this risk assessment was on the additional criteria from the SBP standard not covered by the previous FSC NRAF draft. However, relevant findings and results of the NRAF field test have been part of this project.

Along with a forestry expert from the Lithuanian Fund for Nature, staff from NEPCon Lithuania facilitated the process of preparing this risk assessment. In addition, the State Forest Service under the Ministry of Environment of the Republic of Lithuania, assigned as Competent Authority for EUTR, provided a list of the applicable legislation related to forestry activities.

This Regional Risk Assessment (RRA) is based on a number of different sources of information, including applicable legislation, reports from state authorities and other stakeholders, various databases as well as statistical data sources. During the preparation of the RRA, a detailed baseline study was made for each of the SBP indicators. A summarised description of each indicator is presented in Annex 1 and a suitable risk level has been allocated based on the information provided.

This RRA is produced according to the above mentioned detailed analyses and informed by two rounds of stakeholder consultations. The response from stakeholders has been considered in this RRA. Detailed findings for each of the SBP indicators are presented in Annex 1, while the methodology, conclusions and stakeholder consultation process is described in the following sections.

## 2 Scope and regional background

The scope of this assessment covers the entire territory of Lithuania (see the map below). The Law on Forests defines forest as a tract of land, no less than 0.1 ha, covered by trees or other forest vegetation or temporary loss of it (cleared or burned areas). Forests in Lithuania are divided into four classifications: forest reserves, special purpose forests, protected forests and commercial forests. With respect to ownership, forest land is divided into state and private forest. As of 1 January 2014, just over half of all forest land in Lithuania was owned by the state – equal to 1,080,900 ha. An area of 824,000 ha of private forest was registered in the State Enterprise Centre of Registers, with the total private forest holding estimated to cover an area of 858,100 ha. Public forest consists of 42 state forest enterprises and one national park under subordination of the Ministry of Environment. By 1 January 2014, the number of registered private forest owners was approximately 247,000, which corresponds to an average of 3.3 ha per private forest property.

The country is considered homogenous with regard to SBP risks, therefore, no further sub-division is needed. Where differences in regards to forest ownership are identified it is explicitly mentioned under the finding of each indicator.



Map of Lithuania. Source: Google

### 3 Methodology

NEPCon has estimated a significant overlap (approximately 50%) between the FSC NRAF requirements and the requirements in SBP Standard 1. This project provides an update of the risk assessment carried out in Lithuania for FSC in 2013 and covers all relevant criteria and indicators of the SBP Feedstock Compliance Standard. The same team that was involved in the FSC risk assessment testing process, completed this analysis, thus capitalising on work already done. In addition, the team consulted key Lithuanian experts on specific issues related to biomass production. After the preliminary analyses of the different sources of information, including applicable legislation, reports from state authorities and other stakeholders, various databases and statistical data sources, the first draft of the RRA analysis was completed and sent to other experts in NEPCon for review.

The draft RRA passed through a repeated stakeholder consultation process. The first round of the stakeholder consultation process started when the first draft of the Lithuanian RRA (after the review by SBP) was presented to key stakeholders. As a result of the discussions during the workshop, it was agreed to provide stakeholders with additional time to give their comments on several of the indicators. The additional comments from stakeholders were received by 9 January 2015. The additional analyses and final review of the draft RRA, taking into account the comments and responses from stakeholders, resulted in the final draft report for the RRA for Lithuania, which included updated findings for SBP indicators (see Annex 1). The stakeholder consultation process is described and explained in the following section.

The analyses were targeted towards main feedstock producers in Lithuania. These are state forest enterprises, cooperative societies of private forest owners, separate private forest owners, sawmills and other timber industry entities importing and producing the feedstock material (feedstock from timber processing, feedstock from energy plantations and feedstock received from outside forests).

The indicators relating to forest management practices and environmental protection measures were analysed taking into account only the primary feedstock producers in Lithuania, as they are the ones with a direct impact on the indicators. The primary feedstock producers in Lithuania are: 1) state forest enterprises; 2) cooperative societies of private forest owners; and 3) separate private forest owners. However, all possible inputs from the supply base were considered and therefore criteria not directly related to the forest management practice were also analysed, taking into account not only the primary feedstock suppliers but also others such as sawmills and timber industry entities importing, producing and exporting the biomass products.

All 42 state forest enterprises and three private forest owners, managing about 1,850 ha of private forests and covering more than 300 private forest management units, are certified according to the FSC Forest Management and Chain of Custody standard. Many SBP indicators match the ones that have been evaluated and addressed during the FSC certification process. The FSC certification process of state forest enterprises has been in place for more than a decade, during which time many corrective and preventative measures have been implemented. As a result the risk for several SBP indicators in state forest enterprises is low, whereas they are specified in private forest. In addition, all state forest enterprises in Lithuania face obligations under the EU Timber Regulation, which includes the obligation to have a due diligence system in place. The due diligence systems of the state forest enterprises are currently being externally evaluated and



certified, which decreases the risk in terms of legality. The main biomass product provided to the market can be divided into two groups: pellets and chips. Both were considered to be produced from feedstock material sourced from primary feedstock suppliers such as the Lithuanian state forest enterprises, Lithuanian private forest, agricultural land owners and other local timber industry entities.

## 4 Stakeholder consultation

### First round

After the first draft of the Lithuanian risk assessment was prepared and discussed with SBP it was presented to key stakeholders at a workshop, organised by NEPCo and SBP, on 27 November 2014 in Vilnius, Lithuania. All stakeholders with an interest in biomass production in Lithuania and in SBP were invited to participate in the workshop. Those participating in the workshop were:

- **Lithuanian Biomass Energy Association LITBIOMA**, established in the summer of 2003 currently with 52 members. The association involves the producers and suppliers of solid biofuel and other renewable local resources, such as wood, straw, energetic willows, peat, as well as the producers and designers of biofuel boiler rooms and other equipment, and developers of plantations and academic institutions.
- **Graanul Invest**, a privately owned company established in 2003, and operating in the field of forestry, development of bioenergy and production of renewable energy. The stated goal of the company is to produce and supply nature-friendly and high-quality products to its customers and contribute to the preservation of the environment by providing renewable fuel to the market.
- **GECO Energy Company**, a leading Lithuanian capital company group, investing in and implementing renewable energy projects in Lithuania and other Baltic and East European Countries. The stated primary target of the company's investment is generation of heat from biofuel. The company builds and manages biofuel boiler houses, supplying heat to centralised district heating networks.
- **EUROMEDIENA**, a company promoting biotechnology to improve the environment and in particular to meet the fast growing needs for biomass by the wood processing industry and energy sectors. Its activities are related to core R&D driven businesses, sale of clonal hybrid aspen saplings, establishment and management of fast growing clonal hybrid aspen plantations, R&D and commercialisation of new forest biotech products (without genetic modification).
- **The Lithuanian Fund for Nature (LFN)**, a non-governmental organisation for the conservation of nature. Its activities are closely related to the preservation of wildlife. The LFN's activities include cooperation with national, municipal, scientific, non-governmental and private institutions, preservation of areas with rare and disappearing species and their habitats, maintenance and restoration of natural habitats, preservation of water bodies, and environmental education.
- **General State Forests Enterprise** under the Ministry of Environment conducts the economic management of state-owned forests attributed to state forest enterprises, organises and co-ordinates restoration, maintenance, protection and utilisation of forests and forest resources. Its aim is to enhance the ecological, environmental, economic, recreational and other socially important values of state forests as the most important components of the whole state forestry by managing them in

accordance with the principles of sustainable forest use and by rational use, restoration and enlargement of forest resources.

- **Aleksandras Stulginskis University** is a state institution of higher education and research. Presently it has over 5,000 students in a wide range of study programmes of biomedicine, technologies and social sciences. It is the state institution of higher education and research in Lithuania, awarding the diplomas and degrees at PhD, MSc and BSc levels in the fields of food sciences, agriculture, forestry, water and land resources management, bioenergy and mechanical engineering, climate change, and sustainable use of natural resources.

### Stakeholder workshops

During the process of preparing the RRA, two rounds of stakeholder consultation were held. A stakeholder workshop was organised within each round, to facilitate better stakeholder consultation. The workshops took place on 27 November 2014 and 13 January 2015. The first workshop started with a presentation on the Sustainable Biomass Partnership (SBP), including an introduction to its mission, activities and future plan (by NEPCon Lithuania Director Justinas Janulaitis). The presentation also included an overview of the RRA project. Later Gerimantas Gaigalas (NEPCon Lithuania Deputy Director) gave an overview of the SBP Framework with a specific focus on SBP Standards 1 and 2. NEPCon staff then presented the first draft RRA and the workshop concluded with a debate session.

### Comments received from stakeholders during workshop

In general, the participants in the workshop welcomed the SBP initiative and the first draft of the RRA for Lithuania and expressed positive views towards the SBP certification process. However, the representatives from Lithuanian Biomass Energy Association, LITBIOMA, and EUROMEDIENA expressed caution related to a possible additional burden for biomass producers to implement future SBP requirements. Although in general they were not against any new requirements, in their opinion the implementation of these requirements should not act as an obstacle or hindrance to the renewable energy sector in terms of competition with fossil fuel. The main concern expressed was in relation to the absence of standards and requirements in the fossil fuel (oil, gas) energy sector, such that conventional energy sources could take advantage of potential additional costs imposed on the renewable energy sector in relation to new requirements, which could make the renewable energy sector less competitive compared to gas and oil energy. In summary, biomass producers could see the potential benefit of the SBP certification, but were keen to stress the risks associated with an unnecessary or imbalanced burden as a result of it.

In regards to the RRA for Lithuania, the discussion focused on the three indicators for which a specified risk level was proposed. For the indicator 1.1.2, the biomass producers proposed to change the risk from specified to low (*Feedstock can be traced back to the defined Supply Base*). The main argument for this was the small portion of feedstock imported and used in the biomass sector in Lithuania. The majority of timber import is re-exported in the form of pulpwood and other timber products. Therefore, it was proposed to review this indicator after 2-5 years to check if the situation had changed. Currently, biomass producers do not see specified risk as the appropriate level of risk for this specific indicator.

In relation to the two remaining indicators where a specified risk level was proposed (indicator 2.8.1: *The BP has control systems and procedures to verify that appropriate safeguards are put in place to protect the*

*health and safety of forest workers, and indicator 2.1.2: The BP has control systems and procedures to verify that potential threats of forest management activities to the HCVs are identified and safeguards are implemented to protect them*) the participants generally did not refute that the risk for these indicators exists in Lithuania. However, they expressed concern on the proposed or possible risk mitigation measures that might be placed on them. Although the most effective risk mitigation measures might be best implemented at the governmental and regulatory level. That being especially relevant in relation to risk associated with the protection of Woodland Key Habitats (WKH) in the private sector. According to the biomass producers, this could easily be solved by legislative measures introducing a protection regime for WKH. The biomass producers agreed to address the Minister of Environment with the proposal to introduce these legislative measures. At the end of the workshop it was agreed to give additional time for stakeholders to analyse the three indicators where a specified risk level was proposed, and the opportunity to provide written comments and arguments in support of their position. It was agreed that all interested stakeholders wishing to comment on these indicators would do so no later than 9 January 2015.

## Second round

After the workshop, the parts of the first draft RRA for Lithuania relevant to the specified risk level were sent to stakeholders for additional comment. By 9 January 2015, the written comments from the Lithuanian Biomass Energy Association (LITBIOMA), EUROMEDIENA and the Association of Private Forest Owners were received. After analysis of the written comments, the relevant stakeholders were contacted and additional discussions held. Taking into account the position of all stakeholders, the results of analysis, and additional information a final conclusion was reached. A brief overview of the final status for the three indicators after the stakeholder consultation process is provided below.

### 1.1.2 Feedstock can be traced back to the defined Supply Base

Consensus among stakeholders to change the level of risk from specified to low for this indicator was reached. Initially, specified risk was proposed for this indicator in relation to a supply base of sawmills and other timber processing entities that might import timber for biomass production from other countries which might not be tracked back to the supply base (and is out of the scope of this risk evaluation as this material cannot be traced to the forest in Lithuania) and/or might mix it with the local timber during the biomass production process. However, the majority of imported timber is re-exported to other countries as pulpwood products or consumed in internal markets. Therefore, only a small amount of imported timber could be used for biomass production. However, the additional analyses and information gathered during the stakeholder consultation process shows that, currently, the amount of imported timber used for biomass production in Lithuania is very small and insignificant. During the stakeholder consultation process the stakeholders agreed to change the level of risk for this indicator from specified to low.

### 2.1.2 The BP has control systems and procedures to verify that potential threats of forest management activities to the HCVs are identified and safeguards are implemented to protect them

The Lithuanian Biomass Energy Association (LITBIOMA), EUROMEDIENA and the Association of Private Forest Owners provided additional statistical information about the situation and condition of WKH and potential WKH in Lithuanian forests, mainly arguing that the statistical data are not very different in private

forest and in state forest. The argument to change the level of risk for this indicator was partially based on additional statistical data and partially on the low probability that timber from WKH in private forests will reach the biomass producer. However, the information provided by other stakeholders (Lithuanian Fund of Nature and other environmental stakeholders) indicates that the situation concerning WKH and reasons for damage to WKH in private forest differs from the reasons for damage to WKH in state forest. The protection measures and regulatory framework for protection of WKH and potential WKH in state forest is clear and well implemented. It should be noted that during the FSC NRAF stakeholder consultation process this issue was discussed and analysed and the same conclusion reached among stakeholders. The situation since then has not changed and there is therefore no reason to review the level of risk for this indicator. It was considered that many preventative measures to avoid damage to WKH (except where caused by natural calamities) had been implemented in state forest because of the FSC certification process (all state forest enterprises are certified according to FSC scheme), whereas such measures may not have been implemented in private forest where private forest is not certified. Taking into account the additional information and given that no consensus among different stakeholders was reached for this indicator (especially between environmental and economic stakeholders), it was decided to maintain the level of risk for this indicator as specified. For a detailed description about this indicator, please see Annex 1.

### 2.8.1 The BP has control systems and procedures to verify that appropriate safeguards are put in place to protect the health and safety of forest workers

The Lithuanian Biomass Energy Association (LITBIOMA), EUROMEDIENA and Association of Private Forest Owners provided additional statistical information about serious injuries in the forest sector in Lithuania, comparing it with the situation in other EU countries and especially those with high health and safety standards for forest workers. Their argument was that it is impossible to completely eliminate serious injuries in the forest sector. Within the forest sector in EU, however, Lithuania has the highest risk in relation to health and safety. The aforementioned stakeholders stated that the regulatory framework in Lithuania is operational and is sufficient for tackling the problem. Further, compared to other countries the situation in Lithuania is not as bad as it was presented in the RRA. However, these arguments were not considered sufficient or substantial enough to change the level of risk for this indicator. Other stakeholders argued to leave the risk level at specified risk for this indicator because of the numerous arguments presented during the workshop and the first draft of RRA. It should be noted that during the FSC NRAF stakeholder consultation process the same problem was discussed and analysed and the same conclusion reached among stakeholders. The situation since then is considered not to have changed and there is therefore no reason to revise the level of risk for this indicator. Taking into account the additional information and that no consensus among the different stakeholders was reached for this indicator (especially between social, environmental and economic stakeholders), it was decided to leave the level of risk as specified for this indicator. For detailed information about this indicator, please see Annex 1.

## 5 Conclusions

Based on the information collected and analysed during the risk assessment process the risk level for each indicator was assessed. In the first draft of the RRA, low risk was assigned to the majority of the indicators. Only three of the indicators were initially designated with a specified risk. In the first draft, specified risk was proposed for the indicators 1.1.2, 2.1.2 and 2.8.1. However, during the stakeholder consultation process and additional analyses it was agreed to change the risk level for indicator 1.1.2 from specified to low risk on the basis of additional data, provided by stakeholder, on the imported material flow and the low probability of using imported material in the biomass industry.

For a more detailed description of the individual indicators please see Annex 1, where an analysis for each indicator is presented. A summary of each of the indicators assigned a specified risk level is given below.

| 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   |             |

### 2.1.2 The BP has control systems and procedures to verify that potential threats of forest management activities to the HCVs are identified and safeguards are implemented to protect them

Representative samples of natural forest habitats and valuable ecosystems in Lithuania are surveyed, identified and protected under the Habitats directive (Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora) and designated as Natura 2000 sites. Close to areas of natural forest, parcels with high biodiversity were discovered and identified as Woodland Key Habitats (WKH). Aggregations of WKH were designated as biosphere polygons at national level or as Natura 2000 sites at EU level. However, large areas of WKH remain outside the protected areas. Based on reports, various databases and statistical data it is evident that the majority of WKH have a certain level of protection through their status as Natura 2000 or through voluntary protection by forest managers. Nevertheless, significant areas of the WKH areas do not have any kind of protection.

An additional inventory of WKH and potential WKH areas carried out in 2013 indicated that the condition of 11% of WKH and 27% of potential WKH in the Lithuanian forests had worsened or was either damaged or destroyed. One of the reasons for such damage or destruction was natural calamities (storms, diseases, insects etc.). The protection of WKH in state forest is regulated by legislation, which ensures the compulsory protection regime of WKH (forest activities are not allowed in WKH). However, the protection of WKH located outside protected areas in private forest is not covered by legislation and is dependent on a voluntary approach by private forest owners. Lack of protection in private forests is thus an important risk for further potential damage of WKH in private forest. Studies conducted by the Lithuanian Fund for Nature (2005, 2013) confirm that a significant part of the damage is caused by harvesting operations in WKH in private forest. Taking into account the aforementioned issues with WKH (significant damage in WKH located in private forest, absence of regulated protection regime of WKH in private forest and outside protected areas), it was concluded that the risk level assigned to this indicator should be specified risk.

### 2.8.1 The BP has control systems and procedures to verify that appropriate safeguards are put in place to protect the health and safety of forest workers

Logging companies working in FSC FM/CoC certified forest operations (e.g. State Forest Enterprises) are, based on subcontracting agreements, monitored by the forest managers that are required to fulfil FSC requirements set out in FSC-STD-01-001 v 5-0. The logging companies are also monitored by the accredited FSC certification bodies during certification audits. All state forest enterprises in Lithuania that face obligations under the EU Timber Regulation decided to evaluate and strengthen their due diligence systems. When implementing the due diligence systems, risk assessments for all state forest enterprises were prepared and health and safety was identified as a high risk area. As a result, corresponding measures have been prepared for implementation. Within the forest sector in the EU, Lithuania is identified as having the highest risk in relation to health and safety problems, due to the occurrence of fatal and serious injuries in private forest. Additionally, it is considered that insufficient measures are implemented to ensure that contractors working in private forest follow the health and safety requirements. Thus, it was concluded to assign the specified risk level for this indicator for contractors working in private forest.

# Annex 1: Detailed findings for Supply Base Evaluation indicators

|                       | Indicator  |
|-----------------------|--|
| 1.1.1                 | The Biomass Producer’s Supply Base is defined and mapped.  |
| Finding               | The biomass supply base includes the main feedstock suppliers in Lithuania, which are state forest enterprises, cooperative societies of private forest owners, separate private forest owners, sawmills and other timber industry entities importing and producing (feedstock received during timber processing, feedstock from energetic plantations and feedstock received from outside forests) the biomass products. The main suppliers of feedstock material are state forest enterprises, private forest owners and other local timber industry entities. These industries can also use material from imports. In which case the imported material could be mixed (during the processing or storage) with local wood material (see more details under indicator 1.1.2).   |
| Means of Verification | <ul style="list-style-type: none"> <li>The Scope is defined and justified</li> <li>Maps to the appropriate scale are available</li> <li>IMŪEPIS (Intelligent Information System for Electronic Forestry Services)</li> </ul>   |
| Evidence Reviewed     | <ul style="list-style-type: none"> <li><a href="#">Law on Forest</a> (1994-11-22, Nr. I-671)</li> <li><a href="#">Law on Territorial Planning</a> (1995-12-12, No. I-1120)</li> <li><a href="#">Rules on Private Forest Use and Management</a> (Decision of The Government, 1997-07-24, No. 799).</li> <li><a href="#">Rules for forest management plan preparation</a> (Order of Lithuanian Minister of Environment, 2006-09-01, No. D1-406)</li> <li><a href="#">Instruction on Forest Management planning</a> (Order of Director of State Forest Service, 2010-01-14, No. 11-10-V)</li> <li><a href="#">Regulations on forest cuttings</a> (Order of Minister of Environment, 2010-01-27, No. D1-79)</li> <li><a href="#">National Program on Development of Forest Sector 2012-2020</a> (Decision of the Government, 2012-05-23, No. 569)</li> </ul> |
| Risk Rating           | <input checked="" type="checkbox"/> <b>Low risk</b> <input type="checkbox"/> <b>Specified risk</b> <input type="checkbox"/> <b>Unspecified risk</b>  |



|                       | Indicator   |
|-----------------------|---|
| 1.1.2                 | Feedstock can be traced back to the defined Supply Base   |
| Finding               | <p>This risk assessment covers material that can be traced to a forest in Lithuania. In the majority of cases the logging operations are carried out on the basis of the requirements of the forest management plan and the issued logging licences. However, there are some specific types of logging where logging licences are not needed and logging can be carried out either after providing written notice to the legal authorities (sanitary logging, selective logging of soft deciduous trees, such as aspen, grey alder, willow and sallow, and commercial thinning, etc.) or without it (property boundary logging, pre-commercial thinning, and selective sanitary logging). The rules on the issuance of logging licences define what information must be included in the cutting licences and permissions, and how long the material must be stored. In those documents the supply base can be tracked back to the place of origin with a detailed description of resources, place and time of harvest (type of forest cuttings, forest group, number of compartment and plot, cutting area, species, volume, period, special conditions, and contact details of forest owner, etc.). The mentioned legislation states that cutting licences must be kept for five years by private forest owners as well as the regional department of the Environmental Protection Agency, which is responsible for the issuance of cutting licences. The schedule of procedures on the transportation of round wood produced in private forest states that the person transporting timber from private forest must have the timber transportation sheet, a document proving identity, the cutting permission (in case it is necessary), the forest ownership document (when the cutting permission is not necessary and transportation is carried out by the owner) or documents proving the legal ownership (contract, etc.) of the timber (when transportation is carried out by the contractor). The necessary information to be included in the transportation sheet is defined in the mentioned legislation (contact information of supplier, receiver and deliverer, vehicular details, the transportation place and time, tree species and volume, and the place and time of delivery). The mentioned legal acts allow a clear link to be established between documents related to transportation, trade or export, and specific material and its origin. The forest control division of the regional office of state Environmental Protection Agency controls how the requirements set up in the legal acts for trade and transportation are being implemented. In case illegal timber is found in the forest, the procedures for such transportation are set up in the regulations on extraction and transportation of illegally produced round wood and the felling of trees and bushes grown on forest land.</p> <p>Initially, specified risk was proposed for this indicator in relation to a supply base of sawmills and other timber processing entities that might import timber for biomass production from other countries, which might not be tracked back to the supply base and/or might mix it with the local timber during the biomass production process. However, the majority of imported timber is re-exported to other countries as pulpwood products or consumed in internal markets, and therefore not used for biomass production. Only a small amount of imported timber could be used for biomass production. However, the additional analyses and information gathered during the stakeholder consultation process show that, currently, the amount of imported timber used for biomass production in Lithuania is very small and insignificant.</p> <p>During the stakeholder consultation process (see the description of the first round stakeholder consultation process) the stakeholders agreed to change this indicator from specified to low risk.</p> |
| Means of Verification | <ul style="list-style-type: none"> <li>• Feedstock inputs, including species and volumes, are consistent with the defined Supply Base</li> <li>• Transport documentation and goods-in records are consistent with the defined scope of the SBE</li> <li>• Public forest registry: IMŪEPIS (Intelligent Information System for Electronic Forestry Services)</li> <li>• Request to Environmental Inspectorate</li> </ul>   |

|                          |  |
|--------------------------|--|
| <p>Evidence Reviewed</p> | <ul style="list-style-type: none"> <li>• <a href="#">Rules on logging license issuance</a> (Order of Minister of Environment 2010-12-30, No. D1-1055)</li> <li>• <a href="#">Regulations on forest cuttings</a> (Order of Minister of Environment, 2010-01-27, No. D1-79)</li> <li>• <a href="#">Schedule of procedures on round wood transportation, produced in private forests</a> (Order of Minister of Environment, 2004-06-03, No. D1-313)</li> <li>• <a href="#">Regulations on private forests management and use</a> (Decision of the Government, 1997-07-24, No. 799)</li> <li>• <a href="#">Regulations on extraction and transportation of illegally produced round wood and cut trees and bushes grown in forest land</a> (Order of Minister of Environment, 2002-05-13, No. 237)</li> <li>• <a href="#">Schedule of procedures on round wood calculation</a> (Order of Minister of Environment, 2007-12-12, No. D1-672)</li> <li>• <a href="#">Schedule of procedures on round wood transportation, produced in private forests</a> (Order of Minister of Environment, 2004-06-03, No. D1-313)</li> <li>• <a href="#">The Schedule of procedures of round wood calculation</a>, 12 December, 2007 No. D1-672, decree of the minister of Environment</li> </ul> |
| <p>Risk Rating</p>       | <p><input checked="" type="checkbox"/> <b>Low risk</b>                      <input type="checkbox"/> <b>Specified risk</b>                      <input type="checkbox"/> <b>Unspecified risk</b></p>   |

|                       | Indicator  |
|-----------------------|--|
| 1.1.3                 | The feedstock input profile is described and categorised by the mix of inputs  |
| Finding               | The state forest enterprises do not undertake timber processing, and sell only the primary products: round wood; fuel wood; chips; cutting residues; and other forest products. The other primary feedstock suppliers, such as private forest owners or corporative societies, might have timber processing facilities, but mostly they sell their primary products to others. The schedule of procedures on round wood calculations sets out how the round wood must be accepted (documents and data required) and describes the rules of the documented timber tracking system and explains in detail how the required documents must be completed. The schedule is obligatory for state forest enterprises, administrators of national parks, and other managers of state forests and can be used by any physical and legal entities producing or selling timber products. Rules on measurement and volume calculation of round wood and timber of standing forests define the procedures, definitions, measurement methods, means and places of round wood, and are obligatory to all forest owners, managers, traders and suppliers. The aforementioned legislation and established system guarantees that the feedstock input profile can be described and categorised by the mix of inputs. Concerning the secondary feedstock there are many rules and requirements set by various standards. These standards are available on the website of the Lithuanian Standardisation Department: <a href="http://www.lsd.lt/standards/tb.php?tbid=20&amp;jobid=2">http://www.lsd.lt/standards/tb.php?tbid=20&amp;jobid=2</a> |
| Means of Verification | <ul style="list-style-type: none"> <li>• Feedstock input records</li> </ul>  |
| Evidence Reviewed     | <ul style="list-style-type: none"> <li>• <a href="#">Rules on logging license issuance</a> (Order of Minister of Environment 2010-12-30, No. D1-1055)</li> <li>• <a href="#">Regulations on forest cuttings</a> (Order of Minister of Environment, 2010-01-27, No. D1-79)</li> <li>• <a href="#">Regulations on private forests management and use</a> (Decision of the Government, 1997-07-24, No. 799)</li> <li>• <a href="#">Regulations on extraction and transportation of illegally produced round wood and cut trees and bushes grown in forest land</a> (Order of Minister of Environment, 2002-05-13, No. 237)</li> <li>• <a href="#">Schedule of procedures on round wood calculation</a> (Order of Minister of Environment, 2007-12-12, No. D1-672)</li> <li>• <a href="#">Schedule of procedures on round wood transportation, produced in private forests</a> (Order of Minister of Environment, 2004-06-03, No. D1-313)</li> <li>• <a href="#">Regulations on round wood trading</a> (Order of Minister of Environment, 2011-12-16, No. D1-984)</li> <li>• <a href="#">Rules on measurement and volume calculation of round wood and timber of standing forests</a>, 10 December, 2002, decree of the minister of Environment No. 631</li> <li>• <a href="#">The Schedule of procedures of round wood calculation</a>, 12 December, 2007 No. D1-672, decree of the minister of Environment</li> </ul>  |
| Risk Rating           | <input checked="" type="checkbox"/> <b>Low risk</b> <input type="checkbox"/> <b>Specified risk</b> <input type="checkbox"/> <b>Unspecified risk</b>  |

|                       | Indicator  |
|-----------------------|--|
| 1.2.1                 | Legality of ownership and land use can be demonstrated for the Supply Base.  |
| Finding               | In Lithuania, the property registration process is strictly regulated by different laws and regulations. Tenure rights can be registered in land registry only if a natural person or a legal entity of any form provides relevant documents confirming the legal rights to the land concerned. This would include identification documents (passport, ID card, company registration documents, etc.), sales-purchase agreements, court decisions or other documents proving the legal right to own real property. The main primary feedstock suppliers in Lithuania providing raw material for biomass production are state forest enterprises and private forest owners. State forest enterprises are entrusted to perform forest activities in state forest by the Decision of the Government in which the map of state forests with exact boundaries is provided. All 42 state forest enterprises are certified according to FSC Forest Management and the Chain of Custody Standards in which the indicators concerning tenure, ownership and management rights and responsibilities are evaluated. In over a decade of FSC certification implementation in state forest enterprises there are no known issues concerning the violation of forest ownership and legal use rights or any disputes over these rights in state forest have been identified. In addition, state forest enterprises have the obligation to perform management rights (sanitation cuttings, etc.) in forest reserved for restitution. The land (forest) restitution process is still ongoing. The process of forest restitution and establishment of legal rights including the provisions for solving disputes is clearly defined by legislation. Private forest ownership rights must follow the registration process defined by legislation and be registered in State Register Centre. Every private forest owner must have the forest estate plan and registration document. There is no evidence in Lithuania that land rights have been issued in violation of the prevailing regulations and that corruption has been involved in the process of issuing land tenure and management rights. |
| Means of Verification | <ul style="list-style-type: none"> <li>• Documents demonstrating that the Biomass Producer is a legally defined entity</li> <li>• Documents showing legal ownership, lease, history of land tenure and the actual legal use</li> <li>• In situations where customary rights govern use and access, these rights are clearly identifiable</li> <li>• Long term unchallenged use</li> </ul>  |
| Evidence Reviewed     | <ul style="list-style-type: none"> <li>• <a href="#">Constitution of the Republic of Lithuania (1992-10-25)</a></li> <li>• <a href="#">Lithuanian Civil Code (2000-07-18, No. VIII-1864)</a></li> <li>• <a href="#">Law on the Real Property Register (1996-09-24, No. I-1539)</a></li> <li>• <a href="#">Law on Land (26 April 1994 No. I-446)</a></li> <li>• <a href="#">Law on Land Reform (25 July 1991, No. I-1607)</a></li> <li>• <a href="#">Law on restoration of citizens' rights to extant real property (1997-07-01, No. VIII-359)</a></li> <li>• <a href="#">Restoration of ownership rights to forest land (Decision of the Government, 1992-08-25, No. 635)</a></li> <li>• <a href="#">State forest management handover to State Forest Enterprises (Decision of the Government, 2006-05-17, No. 454)</a></li> </ul>   |
| Risk Rating           | <input checked="" type="checkbox"/> <b>Low risk</b> <input type="checkbox"/> <b>Specified risk</b> <input type="checkbox"/> <b>Unspecified risk</b>  |

|                       | Indicator   |
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| 1.3.1                 | Feedstock is legally harvested and supplied and is in compliance with EUTR legality requirements.   |
| Finding               | <p>In Lithuania, detailed and strict legislation covering the process of issuing logging licences exists. The implementation and control of this process is performed by the State Forest Service. In the majority of cases, logging operations are carried out based on the requirements of a forest management plan and the terms included in issued logging licences. However, there are some specific types of logging where logging licences are not needed and logging can be carried out either after providing written notice to the legal authorities (sanitary logging, selective logging of soft deciduous trees like aspen, grey alder, willow and sallow, and commercial thinning, etc.) or without it (property boundary logging, pre-commercial thinning, and selective sanitary logging). The regulations on forest cuttings describes the types of forest cuttings and defines the minimum age of forest trees to be cut, which depends on the tree species and the forest categories. In addition to the regulations on forest cuttings, timber harvesting in private forests is regulated by the regulations on private forest use and management, which describe how the cutting rate for one decade must be managed according to cutting age, permissible width of cutting area, and forest stand condition, etc. State forest enterprises have the obligation to perform management rights (sanitation cuttings, etc.) in forests reserved for restitution. In Lithuania, there are no forest harvesting specific fees such as royalties, stumpage fees and other volume-based fees. There are also no fees based on quantities, qualities and species. Based on the annual report from the Customs of the Republic of Lithuania, the wood industry is not mentioned as one of the risky business sectors related to the avoidance of paying custom taxes or inaccurate or false product classification. In general, the Customs of The Republic of Lithuania have enforced strict customs control at different levels, including sample checks of product classification, product value evaluations and product country of origin evaluations. Furthermore, Lithuania is following EU regulations on different product classifications. More information about timber traffic in customs could be found in the Integrated Tariff of the Republic of Lithuania database (LITAR) Annual Report from the Customs of the Republic of Lithuania. The State Forest Service periodically controls how forest operations in cutting areas are being or have been implemented according to existing legal acts. The State Forest Service has an annual control plan where the aspect and places to be checked are listed (2014 annual control plan). Even though the legal authorities have increased control of illegal logging in Lithuania, some illegal logging still occurs. The incidence of illegal logging was more or less stable during the past four years (2008-2012), but has decreased by 64% compared to 2002. In 2011, 527 cases were detected in state and private forest, 8,500 m<sup>3</sup> were illegally logged. The majority (71%) of illegally felled wood, amounting to 6,000 m<sup>3</sup>, was felled in private forest. In 2011, there were 46 cases where already produced round wood was stolen from state forest (in total 700 m<sup>3</sup>). According to statistical data provided by the State Forest Service, illegal logged wood in Lithuania amounts only to 0.1% of the total felled timber volume. Latest available data for 2013 show trends in decreasing numbers of illegal logging cases and volumes. Over the last three years no official cases of bribery among persons responsible for issuing logging licences have been reported. The transparency international corruption perception index for Lithuania in 2013 was 57, therefore corruption is not considered to be a key factor influencing the ability to obtain harvesting permits for areas and species that could not be harvested according to the legislation. According to the latest information of the Royal Institute of International Affairs, illegal logging is not a serious problem in Lithuania; in 2003, an estimated 0.7% of domestic timber production was illegal (UNECE/FAO 2004). The State Forest Service, which is the responsible institution in Lithuania for monitoring the implementation of the EUTR, signed the agreement with the Custom department under the Ministry of Finances in order to share data and information concerning timber import from third parties in customs. Statistical information as well as maps about registered private forest management plans and cutting permissions issued in private forests can be obtained online: <a href="http://www.amvmt.lt:81/mgis/">http://www.amvmt.lt:81/mgis/</a>.</p> |
| Means of Verification | <ul style="list-style-type: none"> <li>Existing legislation</li> <li>Level of enforcement</li> <li>Reference to sources of information in guidance notes</li> </ul>   |
| Evidence Reviewed     | <ul style="list-style-type: none"> <li><a href="#">Regulations on private forests management and use</a> (Decision of the Government, 1997-07-24, No. 799)</li> <li><a href="#">Methodology on defining the amount of main forest cuttings</a> (Order of Minister of Environment, 2008-07-02, No. D1-362)</li> <li><a href="#">Regulations on forest cuttings</a> (Order of Minister of Environment, 2010-01-27, No. D1-79)</li> <li><a href="#">National Program on Development of Forest Sector 2012-2020</a> (Decision of the Government, 2012-05-23, No. 569)</li> <li><a href="#">Schedule of procedures to issue the forest cutting permissions</a> (Order of Minister of Environment, 2010-12-30, No. D1-1055)</li> <li><a href="#">Regulations on marking and evaluation of forest cutting area</a> (Order of Minister of Environment, 2004-11-10, No. D1-577)</li> <li><a href="#">Schedule of procedures on forest cuttings in private forests estates without forest management plan</a> (Order of Minister of Environment, 2004-11-08, No. D1-569)</li> <li><a href="#">Schedule of procedures on forest cutting in forests reserved for privatization</a> (Order of Minister of Environment, 2002-04-</li> </ul>   |

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|-------------|--|
|             | <p>30, No. 219)</p> <ul style="list-style-type: none"> <li>• <a href="#">Regulations on forest cuttings for technological and commercial purposes in forest sector</a> (Order of Minister of Environment, 2002-04-03, No. 145)</li> <li>• <a href="#">Customs Law</a> (2004-04-27 NO IX-2183)</li> <li>• Rules on logging license issuance (Order of Minister of Environment 2010-12-30, No. D1-1055)</li> <li>• Rules on logging site preparation (Order of Minister of Environment 2004-11-10, No. D1-577)</li> <li>• Rules on forest logging for technological and management purposes (Order of Minister of Environment 2002-04-03, No. 145)</li> <li>• Procedure for logging timber, which is needed for private household building, maintenance or reconstruction, in private forests (Order of Minister of Environment 2002-03-18, No. 118)</li> <li>• Rules on logging forests that are reserved for private ownership restitution (Order of Minister of Environment 2002-04-30, No. 219)</li> <li>• <a href="#">Statistical data on forest protection in 2013</a> (State Forest Service, 2013)</li> <li>• <a href="#">Regulations on selling the uncut state forests to persons who's buildings are damaged by natural calamities</a> (Order of Minister of Environment, 2002-01-23, No. 28)</li> <li>• <a href="#">Regulations on main forest cuttings of premature forest stands as well as mature and over-mature trees in not mature forest stands in private forests</a> (Order of Minister of Environment, 2002-03-18, No. 118)</li> <li>• <a href="#">Commission Implementing Regulation (EU) No 927/2012 of 9 October 2012 amending Annex I to Council Regulation (EEC) No 2658/87 on the tariff and statistical nomenclature and on the Common Customs Tariff</a></li> </ul> |
| Risk Rating | <input checked="" type="checkbox"/> <b>Low risk</b> <input type="checkbox"/> <b>Specified risk</b> <input type="checkbox"/> <b>Unspecified risk</b>  |

|                       | Indicator  |
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| 1.4.1                 | Payments for harvest rights and timber, including duties, relevant royalties and taxes related to timber harvesting, are complete and up to date.  |
| Finding               | In Lithuania, no forest harvesting specific fees such as royalties, stumpage fees and other volume-based fees exist. There are also no fees based on quantities, qualities and species. Value Added Tax (VAT) in Lithuania is paid by all persons (natural and legal) having an annual turnover from their business activities in excess of 155.000 LTL. The State Tax Inspectorate is responsible for the collection of VAT, which has to be declared every month by the tax payer. Since 2010, VAT for timber is paid by the purchaser and not by the seller in order to avoid VAT laundering. That significant change in VAT law acts as a good preventative measure in stopping illegal activities related to paying VAT. Therefore the risk related to VAT is considered low. If timber is sold by a natural person to a legal entity, the natural person is liable to pay income tax, which is 15% of the amount received. In such as case, income tax is paid by the company purchasing the wood. If wood is sold by an individual entrepreneur involved in the timber sales business, income tax is paid by that person once a year through the income declaration process. Income tax declaration is coordinated by the State Tax Inspectorate. Declaration of income and payment of income tax allows the possibility to claim back part of the income tax declared, therefore there is economic incentive to make declarations. Information about tax payers can be checked online in the register of tax payers. In addition, on the website of the State Tax Inspectorate there is a record of those legal entities that do not pay taxes due on time. The state forest enterprises are considered by the State Tax Inspectorate as entities with low risk. |
| Means of Verification | <ul style="list-style-type: none"> <li>Records of payments and correspondence with revenue authorities show payments are correct</li> <li>Inquiry to Lithuanian Tax and Customs Board</li> </ul>   |
| Evidence Reviewed     | <ul style="list-style-type: none"> <li><a href="#">Law on Value-Added Tax (2002-03-05, No. IX-751)</a></li> <li><a href="#">Procedures for calculating and paying obligatory payments to state budget for the income received from round wood and standing timber sales in state forests (Decision of the Government, 2002-08-10, No. 1229)</a></li> <li><a href="#">Prices of standing timber in state forests (Order of Minister of Environment, 1998-09-30, No. 194)</a></li> <li><a href="#">Rules for selling standing timber in state forests (Decision of the Government, 2001-10-31, No. 1286)</a></li> <li><a href="#">State Tax Inspectorate database of tax payers in Lithuania</a></li> <li><a href="#">Law on Personal Income Tax (2002-07-02, No. IX-1007)</a></li> <li><a href="#">Rules for registering tax payers to value added tax registry (Order of Head of State Tax Inspectorate, 2002-06-26, No. 178)</a></li> <li><a href="#">Law on Corporate income tax (2001-12-20, IX-675)</a></li> <li><a href="#">Procedures for calculating and paying obligatory payments to state budget for the income received from round wood and standing timber sales in state forests (Decision of the Government, 2002-08-10, No. 1229)</a></li> <li><a href="#">Prices of standing timber in state forests (Order of Minister of Environment, 1998-09-30, No. 194)</a></li> <li><a href="#">State Tax Inspectorate database of tax payers in Lithuania</a></li> <li><a href="#">Rules for registering tax payers to value added tax registry (Order of Head of State Tax Inspectorate, 2002-06-26, No. 178)</a></li> </ul>   |
| Risk Rating           | <input checked="" type="checkbox"/> <b>Low risk</b> <input type="checkbox"/> <b>Specified risk</b> <input type="checkbox"/> <b>Unspecified risk</b>  |

|                       | Indicator  |
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| 1.5.1                 | Feedstock is supplied in compliance with the requirements of CITES.  |
| Finding               | CITES came into force in the Republic of Lithuania on 9 March 2002. The rules for trade in wild animals regulating bringing into and taking out of the Republic of Lithuania animals, parts thereof or articles made of them are prepared following the requirements of the CITES. The procedures and provisions of the Council Regulation (EC) No 338/97 of 9 December 1996 on the protection of species of wild fauna and flora by regulating trade thereof and Commission Regulation (EC) No 1808/2001 of 30 August 2001 laying down detailed rules concerning the implementation of the protection of species of wild fauna and flora by regulating trade thereof, are to be followed and the licences, certificates and other documents as specified in these regulations are required when bringing in (or taking out) animals and plants, parts thereof or articles made of them. An individual licence issued by the Ministry of Environment of the Republic of Lithuania must be presented for each consignment of animals and plants, parts thereof or articles made of them. On bringing in animals and plants, parts thereof and products made of them into (or out of) Lithuania to the third countries, the accomplishment of customs formalities is allowed only upon presenting the required licences. Based on an annual report from the Customs of the Republic of Lithuania in 2013 there were 13 cases identified in which goods were confiscated due to a violation of CITES requirements, however, there is no specification if these were related to animal or plant species. In Lithuania there are no CITES tree species growing. |
| Means of Verification | <ul style="list-style-type: none"> <li>List of species purchased by the biomass producer</li> <li>Records of field inspections</li> <li>Assessment of risk that CITES species may be mixed with non-CITES species, in the supply chain</li> <li>Interviews demonstrate that the CITES requirements are understood</li> <li>CITES species are known and identified</li> <li>Where relevant, the operation possesses permits for harvest and trade in any CITES species.</li> </ul>  |
| Evidence Reviewed     | <ul style="list-style-type: none"> <li><a href="#">Law concerning the ratification of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) (2001-05-22, No. IX-337)</a></li> <li><a href="#">Order of the Minister of Environment of the Republic of Lithuania, Director of the Customs Department under the Ministry of Finance and Director of the State Food and Veterinary Service "On Approval of the Rules for Trade in Wildlife" (2002-12-21, No. 658/831/743)</a></li> <li><a href="#">Law on Environmental Protection (2005-03-24, I-2223)</a></li> <li><a href="#">Law on Wild Flora (1999-06-15, No. VIII-1226)</a></li> <li><a href="#">Order of the Minister of Environment "On Approval of Regulations on Trade in Protected Species of Wild Flora (2006-05-25, No. D1-260)</a></li> <li><a href="#">Annual Report from Customs of the Republic of Lithuania 2013</a></li> </ul>  |
| Risk Rating           | <input checked="" type="checkbox"/> <b>Low risk</b> <input type="checkbox"/> <b>Specified risk</b> <input type="checkbox"/> <b>Unspecified risk</b>  |



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| 1.6.1                 | Feedstock is not sourced from areas where there are violations of traditional or civil rights.   |
| Finding               | In Lithuania, there are no groups of individuals having customary rights to forest harvesting activities. Customary rights to non-timber forest products in state strict nature reserve areas are defined by special regulations allowing local communities to collect berries and mushrooms as well as fishing activities following special provisions. Logging activities in strict nature reserves are prohibited by law. |
| Means of Verification | <ul style="list-style-type: none"> <li>• Traditional and civil rights are identified.</li> <li>• Procedures are in place to ensure rights are not violated</li> </ul>  |
| Evidence Reviewed     | <ul style="list-style-type: none"> <li>• <a href="#">Law on Forest (1994-11-22, Nr. I-671)</a></li> <li>• <a href="#">Rules for visiting Cepkeliai Strict Nature Reserve</a></li> <li>• <a href="#">Rules for fishing in Zuvintas biosphere Strict Nature Reserve</a></li> </ul>   |
| Risk Rating           | <input checked="" type="checkbox"/> <b>Low risk</b> <input type="checkbox"/> <b>Specified risk</b> <input type="checkbox"/> <b>Unspecified risk</b>  |

|         | Indicator   |
|---------|---|
| 2.1.1   | Forests and other areas with high conservation values in the Supply Base are identified and mapped.   |
| Finding | <p>Lithuanian Forests are well surveyed and all major HCV are identified. In the last decades at least two studies were carried out: the Woodland key habitat survey; and the identification of possible Natura 2000 sites survey. Currently there is sufficient information concerning HCV forest location. No major gaps in knowledge about HCV exist and data about biodiversity are updated regularly. Geographic data are sufficient and there are no major gaps in knowledge about important areas. Most important forest areas are designated as protected areas at the national or EU level. All state owned forest enterprises are FSC certified. For the current assessment HCV are identified as follows:</p> <p><b>HCV 1</b> - all protected species, including bird species listed in the Bird Directive and species listed in the Habitat Directive Annex II, are strictly protected at the national level. The current level of information on biodiversity is sufficient to identify most places where large concentrations of protected species are located. At the national level there are two types of species protection: strictly protected species; and protected species. Major sites of location of strictly protected species are known and stored in the database of protected species. There are gaps in knowledge about sites of location of protected species. By the end of 2013 the registration system for protected habitats, animal and plant variety started to operate. In the future the plan is to make available information about all known nesting sites and habitats and there will be an obligation to use such information when issuing cutting permits. All timber is sold together with a copy of the felling permit. The location of cutting activity is written in the permit and it is possible to check that the timber does not originate from sites with protected species habitats. Checking online that the timber does not originate from nesting site of protected birds can be implemented in two ways: requesting information using the online system from the authorities (free of charge, <a href="http://amas1.am.lt/sbgarris/">http://amas1.am.lt/sbgarris/</a>); or registering and using digital maps or Forest Cadaster, which includes information about known nesting sites (fees apply, <a href="http://www.amvmt.lt:81/vmtgis/">http://www.amvmt.lt:81/vmtgis/</a>).</p> <p><b>HCV 2</b> - large woodland territories: UNESCO world heritage sites, Ramsar sites, forests in strict nature reserves, biosphere reserves, reserves of national or regional parks. Historical land use and forestry practices have resulted in the majority of present forest in Lithuania being semi-natural ecosystems with small insertions of close to natural forests stands. No landscape-scale natural forests with viable populations of most naturally occurring species exist in the country. Surveys show that in the last centuries all Lithuanian forest was under various management activities varying from extensive to very intensive forestry with land use change. The first forestry practices to be suspended were in wetland forest stands situated around big bogs due to the establishment of strict nature reserves of big wetlands. In the 1970s forestry practices were suspended in other valuable forests on account of the creation of nature reserves. Three areas of UNESCO world heritage are established in Lithuania. The sites are owned by the state and no active forestry takes place in these sites. Five Ramsar convention areas are designated in Lithuania. Four of them are under strict protection, and one is managed under a nature management plan. Other important areas for the biodiversity landscape include valuable forest in national parks, regional parks and biosphere reserve. All of them are managed under nature management plans or not managed at all. Currently there is no evidence that remaining important large scale forests are impacted by forestry practices. A majority of important landscape level ecosystems are designated as strict nature reserves or biosphere reserves at the national level and are owned exclusively by the state. However, a full country survey of biodiversity and habitats is ongoing and can provide extra data about the status and sufficiency of current protected forests.</p> <p><b>HCV 3</b>- Natura 2000 sites, WKH. In Lithuania, there is currently no virgin forest. The remaining old-grown forest belongs to the state and is under strict protection including the strict reserves or strict reserve zones of regional parks. Representative samples of natural forest habitats and valuable ecosystems are surveyed, identified and protected under the Habitats Directive (<i>Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora</i>) and designated as Natura 2000 sites. All Natura 2000 sites overlap with national protected areas and are protected on both a national and international level. Close to natural forest parcels with high biodiversity are identified as WKH. Aggregations of WKH are designated as biosphere polygons at the national level or as Natura 2000 sites at the EU level. However, large areas of WKH remain outside protected areas. Old growth forests in Lithuania belong to the state and are under strict protection. No cases of timber logging in such territories were registered during the last decade. According to the current regulation, forests areas belonging to Natura 2000 sites should be managed by both forest management and (or) nature management plans. Presently, not all Natura 2000 sites have nature management plans, which means that the majority are managed only by forest management plans. However, subsidies are paid to forest owners due to management restrictions in Natura 2000 sites, therefore the level of protection of sites is defined as adequate. The majority of WKH have a certain level of protection by falling inside Natura 2000 sites or as voluntarily protected sites by forest managers.</p> |

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|                              | <p><b>HCV 4</b> - ecosystem protection forests and protection forests. Lithuania belongs to the boreal forest zone and forest provides key services for ecosystems. To ensure quality of such services all forest is divided into four groups by the Lithuanian forest law. Two groups are directly related to the ecosystem services: IIA - ecosystem protection forests (8.2% from total forest area); and III - protection forests (16.1% from total forest area). Special regulations for forest management apply to such forests, mainly by raising the cutting age and limiting felling techniques to provide critical ecosystem services such as soil, air, water and man's living environment protection. Forest groups are defined by government decision. Implementation of the forest law is provided through forest management plans, which are obligatory for the majority of forest holdings. All management plans should be approved by the competent authorities. Forest groups are designated by territorial planning documents - forest management schemes. Attributing forest into the groups is prepared in accordance with the official guides of forest attribution to the groups. Forest groups can be changed only by the decision of the Government under two clearly defined circumstances - change in the forest management scheme for the region or a change of boundaries of protected areas.</p> <p><b>HCV 5</b> - main necessities of local communities are related to recreation, mushroom collection and berry picking. These activities are important for many people for leisure or perquisite income. The right to free access to the forest is guaranteed in the Constitution of the Republic of Lithuania, Forests Law and other legal acts. With a few exceptions all forest is available for berry and mushroom picking. Exceptions include only the nature reserves and berry plantations in the forest. Forest management does not play a significant role in relation to community necessities, because the Lithuanian forest cover is more than 30% and various succession stage forests are available in the landscape, therefore no risk related to this sub-category exist.</p> <p><b>HCV 6</b> - forest and parks in or around cultural values, manor parks, urban forest, forest of important historical sites. In Lithuania there are no cultural areas directly related to the forest and trees. Some forest is inside cities, manor parks, urban forest, forest of important historical sites. Most of the cultural forest is owned by the state. Such places are managed according to various different regulations and management plans. Historical places are under the supervision of the Cultural Heritage Department, urban forest and parks are managed by municipalities. There are no major problems with forest related to the cultural values. A working database of immovable cultural value exists and all values are preserved by implementation of the Law on Protection of Immovable Cultural Properties, which can be considered as sufficient.</p> |
| <p>Means of Verification</p> | <ul style="list-style-type: none"> <li>• Spatial information Portal (<a href="http://www.geoportal.lt">www.geoportal.lt</a>)</li> <li>• Maps</li> <li>• Interviews</li> <li>• Regional, publicly available data from a credible third party</li> <li>• The existence of a strong legal framework in the region.</li> <li>• Public forest registry: IMŪEPIS (Intelligent Information System for Electronic Forestry Services)</li> </ul>  |
| <p>Evidence Reviewed</p>     | <ul style="list-style-type: none"> <li>• <a href="#">Lithuanian environmental protection strategy: action program</a> (1996, Ministry of Environment of the Republic of Lithuania)</li> <li>• <a href="#">Biodiversity conservation strategy and action plan</a> (1998, Ministry of Environment of the Republic of Lithuania)</li> <li>• <a href="#">Law on Forest</a> (1994-11-22, Nr. I-671)</li> <li>• <a href="#">Regulations and schedule of procedures on assigning the forests to forest categories</a> (2001-09-26 No. 1171, Decision of The Government)</li> <li>• <a href="#">Law on Protected Areas</a> (1993-12-09 No. I-301)</li> <li>• <a href="#">Baltic Forest Mapping</a> (2003)</li> <li>• Lithuanian Spatial information Portal (<a href="http://www.geoportal.lt">www.geoportal.lt</a>)</li> <li>• <a href="http://www.natura2000info.lt">www.natura2000info.lt</a></li> <li>• Lithuanian National Forest Inventory 2008-2010. Forest resources and their dynamics (2010, Ministry of Environment of the Republic of Lithuania)</li> <li>• <a href="#">Audit of past and ongoing natural areas inventory and mapping projects, methods and results in Lithuania.</a> (2010, Nature Research Centre)</li> </ul>   |
| <p>Risk Rating</p>           | <p><input checked="" type="checkbox"/> <b>Low risk</b>                      <input type="checkbox"/> <b>Specified risk</b>                      <input type="checkbox"/> <b>Unspecified risk</b></p>   |

|         | Indicator   |
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| 2.1.2   | Potential threats to forests and other areas with high conservation values from forest management activities are identified and addressed.  |
| Finding | <p>The management of established protected areas is regulated by the Law on Protected Areas. The main legal documents, which regulate the protection and management regime of protected areas, are: Law on Protected Areas; Regulations of individual protected area; the planning documents of individual protected area; the individual regulation of protected objects or selective areas; and contracts on protection. The management of Lithuanian forest according to the Law on Forests is based on the forest management plan, which includes a special section on nature protection measures where the protected species, habitats and other environmental protection values or objects are listed and marked on the maps with prescribed and detailed protection measures. Forest management plans for private forest must include a special section related to forest protection and implementation of requirements for environmental protection.</p> <p>The Law on Forests states that according to management purposes Lithuanian forest is divided into four groups (forest reserves, special-purpose forest, protective forest, and exploitative forest). Forest harvesting is allowed depending on the management and protection regime assigned, based on the forest group. Special regulations of forest management apply to forest by raising the cutting age and limiting felling techniques to provide critical ecosystem services such as soil, air, water and man's living environment protection. There are strict rules on forest management in each of these groups, for example: group IIA - clear felling is forbidden, and only mature trees can be felled using selective cuttings; group III - clear felling is restricted to 5 ha and an additional age limit is set for some tree species. The forest operations must be planned and implement the requirements set out in the regulations on forest cuttings. There are provisions in the regulations for seasonal harvesting operations according to the forest groups (for instance, in some forest of groups II and III the final cuttings are not allowed from 1 March until 1 April). There are requirements for protection of nesting places of rare and endangered bird species as well as detailed requirements to leave trees and dead wood for biodiversity protection in logging sites. The maintenance of buffer zones along watercourses or open areas as well as some limitation in relation to the protection of soil against erosion is foreseen in the regulations on forest cuttings. For instance, the final forest cuttings are not allowed on the slopes along watercourses with an angle of more than 10° and in any slopes with an angle of more than 45°.</p> <p>According to the current regulations, forest areas belonging to Natura 2000 sites should be managed by both forest management and (or) nature management plans. Presently, not all Natura 2000 sites have nature management plans, therefore a majority are managed only by forest management plans. However, subsidies are paid to forest owners due to management restrictions at Natura 2000 sites, therefore the level of protection of sites is defined as adequate.</p> <p>Representative samples of natural forest habitats and valuable ecosystems in Lithuania are surveyed, identified and protected under the Habitats Directive (Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora) and designated as Natura 2000 sites. Semi-natural forest parcels with high biodiversity are identified as WKH. Aggregations of WKH were designated as biosphere polygons at the national level or as Natura 2000 sites at the EU level. However, large areas of WKH remain outside protected areas. Based on different sources of information, reports, and various databases as well as statistical data sources, it is evident that the majority of WKH have a certain level of protection through their Natura 2000 status or voluntary protection by forest managers. However, significant areas of WKH do not have any protection. The additional inventory of WKH and potential WKH carried out in 2013 shows that the condition of 11% of WKH and 27.4% of potential WKH became worse, or damaged, or destroyed in Lithuanian forest. The first inventory of WKH was carried out in 2002-2004, with 8,902 WKH and potential WKH selected in the total area of 26,427.6 ha (of which 5,609 was WKH and 3,293 was potential WKH). In 2013, the additional survey of WKH and potential WKH was carried out in Lithuania. The result of the inventory showed that the status of 89% of WKH remained stable or improved, 4.5% was damaged and 6.5% was destroyed. Among potential WKH the inventory showed that 28.4% was improved, 44.2% was stable and 27.4% was damaged or destroyed. One of the reasons for such damage or destruction was the natural calamities (storms, diseases, insects, etc.). The protection of WKH in state forest is regulated by legislation, which ensures the compulsory protection regime of WKH (forest activities are not allowed in WKH in state forest). However, the protection of WKH (which are outside protected areas) in private forest is not covered by legislation and is based on a voluntary approach by private forest owners. The lack of such legislative protection in private forest is the reason for further potential damage to WKH. Studies made by the Lithuanian Fund for Nature (2005, 2013) show that there is significant damage in WKH located in private forest. Taking into account the aforementioned information (significant damage in WKH located in private forest and</p> |

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|                              | <p>absence of a regulated protection regime), it is proposed to assign specified risk for this criterion in relation to protection of Woodland Key Habitats in private forest against negative impacts of forest activities.</p> <p>Historical places under the supervision of the Cultural Heritage Department, urban forests and parks are managed by municipalities. There are no major problems with forest related to the cultural values. A working database of immovable cultural value exists and all values are preserved by implementation of the Law on Protection of Immovable Cultural Properties, which can be considered as sufficient. Historical places are preserved using the precaution approach, e.g. creating buffer zones around important areas or by carrying out mandatory exploratory research. No cases of destruction of immovable cultural values due to forest management are recorded in Lithuania. State forest enterprises have developed their own procedures for identification, monitoring and protection of HCV forest.</p> <p>State forest enterprises constantly check how forest operations are being performed in state forest, and whether they follow environmental requirements stated in the planning documents and logging permissions. The State Forest Service periodically controls how the application of legal acts focused on the protection of natural values, objects and protected areas are implemented. The State Forest Service has an annual control plan where the aspect and places to be checked are listed (2014 annual control plan). In addition, the regional offices of the Environmental Protection Agency periodically control how the management and application of legal requirements for environmental protection are implemented in the management units. The report citing places checked and issues found is published on the website <a href="http://www.am.lt/">http://www.am.lt/</a>. Based on the reports produced by the authorities it is evident that there is no systematic and/or large scale non-compliance with legally required environmental protection measures to an extent that threatens the forest resources or other environmental values.</p> <p>The indicator is identified as low risk for state forest enterprises and specified risk for private forest.</p> |
| <p>Means of Verification</p> | <ul style="list-style-type: none"> <li>• Guidance provided by biomass producers to suppliers/forest operators, regarding threats to the identified forests and areas of high conservation values, and verification of conformance through field inspections</li> <li>• Regional Best Management Practices</li> <li>• Standard Operating Procedures</li> <li>• Codes of Practice</li> <li>• Records of biomass producer's field inspections</li> <li>• Monitoring records</li> <li>• Interviews with staff</li> <li>• Spatial information Portal (<a href="http://www.geoportal.lt">www.geoportal.lt</a>) maps</li> <li>• Public forest registry: IMUEPIS (Intelligent Information System for Electronic Forestry Services)</li> </ul>  |
| <p>Evidence Reviewed</p>     | <ul style="list-style-type: none"> <li>• <a href="#">Lithuanian environmental protection strategy: action program</a> (1996, Ministry of Environment of the Republic of Lithuania)</li> <li>• <a href="#">Biodiversity conservation strategy and action plan</a> (1998, Ministry of Environment of the Republic of Lithuania).</li> <li>• <a href="#">Law on Forest</a> (1994-11-22, Nr. I-671)</li> <li>• <a href="#">Regulations and schedule of procedures on assigning the forests to forest categories</a> (2001-09-26 No. 1171, Decision of The Government).</li> <li>• <a href="#">Low on Protected Areas</a> (1993-12-09 No. I-301).</li> <li>• <a href="#">Baltic Forest Mapping</a> (2003).</li> <li>• Lithuanian Spatial information Portal (<a href="http://www.geoportal.lt">www.geoportal.lt</a>)</li> <li>• <a href="http://www.natura2000info.lt">www.natura2000info.lt</a></li> <li>• Lithuanian National Forest Inventory 2008-2010. Forest resources and their dynamics (2010, Ministry of Environment of the Republic of Lithuania).</li> <li>• <a href="#">Audit of past and ongoing natural areas inventory and mapping projects, methods and results in Lithuania.</a> (2010, Nature Research Centre)</li> </ul>  |
| <p>Risk Rating</p>           | <p> <input type="checkbox"/> Low risk             <input checked="" type="checkbox"/> Specified risk             <input type="checkbox"/> Unspecified risk         </p>  |

|                       | Indicator   |
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| 2.1.3                 | Feedstock is not sourced from forests converted to production plantation forest or non-forest lands after January 2008.   |
| Finding               | <p>According to the Lithuanian Law on Forests, forest is defined as a tract of land not less than 0.1 ha, covered by trees or other forest vegetation or temporary loss of it (cleared or burned areas). According to regulations on reforestation and planting, plantation is defined as a special purpose of one tree or bush species plantation grown for commercial timber, energetic resources etc. According to the Law on Land, forest land includes: forested area (forest stands), non-forested area (clear cutting area, damage forest stands, open forest area, forest nurseries, forest seed orchards, raw bush area and plantations), area comprising forest roads, forest compartments, technological and fire prevention borders, area of forest yards, recreational yards, game feeding sports and land assigned for afforestation as well as fragments of other land use purpose inside the forest. The conversion of forest land into other categories is strictly regulated by national legislation and is allowed only in clearly defined and exceptional cases. The main legal acts dealing with the conversion of forest land into other categories are as follows: The Law on Land, The Law on Territory Planning, The Law on Forests, The Regulation Procedures of the Conversion of Forest Land into Other Categories, and Compensation for the Conversion of Forest Land into Other Categories. The conversion of forest land into other categories is prohibited in forest reserves, forest for the protection of ecosystems, forest for the Baltic Sea and Curonian Lagoon protection (1 km), protected forest, forest of protective zones in state parks and other forest categories mentioned in the Law on Forests (for details, please see the source information). The conversion of forest land into other categories according to national legislation is allowed only in seven exceptional cases, related to: objects of state importance, communication infrastructure, objects of public importance, mineral resources, military objects, waste storage facilities, and restoration of former countryside objects. In addition, the national legislation states that in cases of conversion of forest land into other categories (only in the mentioned exceptional cases), an equal amount of land must be afforested and be assigned to forest land. The person who initiates the conversion (according to exceptional cases prescribed by the law) must pay compensation to the state budget equal to the market price of forest land under conversion and cover any expenses necessary to plant the same area of forest and maintain it until it reaches the status of forest land, as well as covering the lost timber growth. The compensation for conversion of forest in group III is double the normal amount, and in group II triple. <u>Forest statistics shows</u> that during the last 11 years (only in state forest enterprises) approximately 1,070 ha of agricultural land has been afforested. The latest data (2011) indicates that state forest enterprises afforested 700 ha of agricultural land, almost all of which was established artificially (800 ha in 2010). 3,900 ha of forest was established in 2011 by private land owners. Compared with data on land conversion, it is clear that the afforestation rate is far above the land conversion. The forest statistics shows that no forest land has been converted into other categories since the year 2003 with exception of 2012 when 275 ha of non-forested land was assigned to another category. This constitutes only 0.01% of total forest land (2,172,855 ha). In addition, the forest statistics clearly indicate that forest coverage in Lithuania since the year 2003 has increased from 31.3% to 33.3%. The other data (afforestation, forest area covered by stands, etc.) confirm the increase of forest during the period 2003 - 2012. Nevertheless, the <u>National Strategy on Energy</u> encourages the development of energy crop plantations in Lithuania; it foresees the establishment of energy crop plantations only on agricultural land. There is no evidence, initiatives, facts or tendency of forest land conversion into other categories which could give the conclusion to assign specified risk to this indicator. Forest inventory data in Lithuania is available from 1969 and the forest statistics including forest land use change, forest coverage, forest conversion and other related information is available on the website of the <u>State Forest Service</u>. Over more than a decade of FSC certification in state forest enterprises the conversion of forest land has been strictly monitored and registered and has been allowed only in exceptional cases (conversion of small area for electricity or gas line construction purposes). All these cases are known and can be tracked. The establishment of energy crop plantations is regulated by the Law on Biofuel, National Energetic Strategy and other by-laws which indicate that the establishment of energetic plantations must be only on agricultural land. Other legal acts related to forestry clearly state that it is not allowed to convert forest land to energy crop plantations.</p> |
| Means of Verification | <ul style="list-style-type: none"> <li>• Historical maps and consultation with stakeholders</li> <li>• Regional, publicly available data from a credible third party</li> <li>• The existence of a strong legal framework in the region</li> </ul>  |

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| <p>Evidence Reviewed</p> | <ul style="list-style-type: none"> <li>• <a href="#">Law on Land / 26 April 1994 No. I-446</a> (English version)</li> <li>• <a href="#">Law on Territory Planning / 1 December 1995 No I-1120</a> (English version)</li> <li>• <a href="#">Law on Forests</a> (1994-11-22, No.I-671) (Lithuanian version)</li> <li>• <a href="#">The Government Decision No 1131 of 28 September 2011 „The Regulation Procedures of the Conversion of Forest Land into Other Categories and Compensation for the Conversion of Forest Land into Other Categories”</a> (Lithuanian version)</li> <li>• <a href="#">Decision of the Government No 1278/13 October 2004 “Regulations on Defining the Main Land Use Purpose and Procedures for Application, Evaluation and Decision-Making in Order to Change the Main Land Use Purpose</a> (Lithuanian version)</li> <li>• <a href="#">The Decision of the Government No 49/12 January 2012 “Regulation on the Procedures to Define and Change the Main Land-Use Purpose”</a> (Lithuanian version)</li> <li>• <a href="#">Law on Biofuel (2000-07-18, No VIII-1875)</a> (Lithuanian version)</li> <li>• National energetic strategy (2007-01-18, No X-1046)</li> <li>• <a href="#">State Forest Service under the Ministry of Environment (Forest statistics 2013)</a></li> </ul> |
| <p>Risk Rating</p>       | <p><input checked="" type="checkbox"/> <b>Low risk</b>                      <input type="checkbox"/> <b>Specified risk</b>                      <input type="checkbox"/> <b>Unspecified risk</b></p>   |

|                       | Indicator   |
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| 2.2.1                 | Feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them.   |
| Finding               | <p>The Law on Environmental Impact Assessment of the Proposed Economic Activity defines the procedures, responsible institutions and provides a list of specific activities for which the defined environmental impact assessment must be performed. A separate section of activities related to the forest sector, for which the environmental impact assessment must be performed, is defined, for instance: in case of afforestation or forest cutting with the aim of changing the land-use purpose (area of more than 1 ha in the city's territory and more than 10 ha in the countryside). The Law on Environmental Monitoring specifies the content, structure, implementation of environmental monitoring, the rights and duties as well as responsibility of the entities participating in the process of environmental monitoring. The main planning document where the assessment of impacts, and subsequent planning, implementation and monitoring are defined for forest owners, is the forest management plan. The regulations on preparation of forest management schemes and forest management plans define the procedures for preparation, approval, update, registration, content and quality review of forest management plans for both state and private forest owners. Forest management plans include analyses, monitoring results and the description of management impact on the previous period. During the preparation process of a new management plan all relevant data must be collected and together with analyses of the previous management cycle must be fed into a new management plan and consequently into operational practice. In addition, all state forest enterprises have developed their own environmental impact assessment procedures for activities which could have a negative impact on the environment, for instance: road reconstruction, drainage, and the construction of gas or electricity lines etc. Prevailing practice is to include in the agreements with contractors the requirement to inform the forest owner about observed potential negative impacts of forest operation to biodiversity and ecosystems and to take preventative measures to avoid or minimise it. In addition, checking the forest area before cutting is performed by state forest officials in state forest. The State Forest Service periodically controls how forest operations in cutting areas are being or have been implemented according to existing legal acts. The State Forest Service has an annual control plan where the aspect and places to be checked are listed (2014 annual control plan). There are different environmental NGOs which periodically monitor several aspects of forest operation impact on the environment or carry out different inventories or monitoring projects. For instance, in 2013 the overall Woodland Key Habitats inventory was performed in all forest in order to determine any changes in WKH status. The various monitoring results in the form of databases, project results, national forest inventory and statistical data are available on different portals and websites of the responsible institutions, for instance: State Forest Service etc.</p> |
| Means of Verification | <ul style="list-style-type: none"> <li>• Regional Best Management Practices</li> <li>• Supply contracts</li> <li>• Assessment of potential impacts at operational level</li> <li>• Assessment of measures to minimize impacts</li> <li>• Monitoring results</li> <li>• Publicly available information on protecting the values identified</li> <li>• Level of enforcement</li> <li>• Regional, publicly available data from a credible third party</li> <li>• The existence of a strong legal framework in the region</li> <li>• Public forest registry: IMŪEPIS (Intelligent Information System for Electronic Forestry Services)</li> </ul>   |
| Evidence Reviewed     | <ul style="list-style-type: none"> <li>• <a href="#">Law on Environmental Protection</a>, 21 January 1992 No I-2223</li> <li>• <a href="#">Law on Environmental Impact Assessment of the Proposed Economic Activity</a>, 15 August 1996 No. I-1495 (Lithuanian version)</li> <li>• <a href="#">Law on Environmental Monitoring</a>, 20 November 1997 No VIII - 529</li> <li>• <a href="#">Rules for forest management plan preparation</a> (Order of Lithuanian Minister of Environment, 2006-09-01, No. D1-406)</li> <li>• <a href="#">Instruction on Forest Management planning</a> (Order of Director of State Forest Service, 2010-01-14, No. 11-10-V).</li> <li>• <a href="#">Rules on Private Forest Use and Management</a> (Decision of The Government, 1997-07-24, No. 799).</li> <li>• <a href="#">Law on Forest</a> (1994-11-22, Nr. I-671)</li> <li>• <a href="#">Rules on state forest inventory, forest management planning, inventory data gathering, data management and data submission to forest owners and managers</a> (Order of Lithuanian Minister of Environment, 2001-07-02, No. 352)</li> <li>• <a href="#">Regulations on forest cuttings</a> (Order of Minister of Environment, 2010-01-27, No. D1-79)</li> <li>• <a href="#">National Program on Development of Forest Sector 2012-2020</a> (Decision of the Government, 2012-05-23, No. 569)</li> </ul>   |
| Risk rating           | <input checked="" type="checkbox"/> <b>Low risk</b> <input type="checkbox"/> <b>Specified risk</b> <input type="checkbox"/> <b>Unspecified risk</b>   |



|                       | Indicator  |
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| 2.2.2                 | Feedstock is sourced from forests where management maintains or improves soil quality.   |
| Finding               | <p>The Law on Forests states that according to the management purpose Lithuanian forest is divided into four groups (forest reserves, special-purpose forests, protective forest, and exploitative forest). Forest cuttings are allowed depending on the management and protection regime assigned based on the forest group. Special regulations of forest management apply to forests by raising the cutting age and limiting felling techniques to provide critical ecosystem services such as soil, air, water and man's living environment protection. The forest operations must be planned and implemented according to the requirements set out in the regulations on forest cuttings. There are provisions in the mentioned regulations for seasonal harvesting operations according to the forest groups (for instance, in some forest of groups II and III the final cuttings are not allowed from 1 March until 1 April) for the protection of soil. The maintenance of buffer zones along watercourses or open areas as well as some limitation in relation to the protection of soil against erosion is foreseen in the regulations on forest cuttings. For instance, final forest cuttings are not allowed on the slopes along watercourses with an angle of more than 10° and in any slopes with an angle of more than 45°. In the regulation of forest cuttings the technological requirements are clearly defined (system of skidding roads, places to store biomass, etc.), for instance: it is not allowed to burn biomass in forests, to extract biomass from certain forest site types (with poor soil layer) or from forests of group II etc. The regulation on reforestation and planting sets the requirements for soil preparation before planting according to existing soil type. The management of Lithuanian forest according to the Law on Forests is based on a forest management plan, which includes a special section on nature protection measures where the protected species, habitats and other environmental protection values (including soil) or objects are listed and marked on the maps with prescribed and detailed protection measures. The forest management plan for private forest owners must have a special section related to forest protection and implementation of requirements for environmental protection. In addition the forest management plan, the planning documents of the individual protected area, and the individual regulation of protected objects or selective areas defines the requirements and procedures to prevent soil damage, for instance in certain areas cutting activities are only allowed when the soil surface is frozen. The cutting activities in protected areas must be agreed with the relevant authorities (state or regional park administrations, protected areas authorities, etc.). Before cutting the preliminary environmental impact assessment (impact to soil) is carried out by foresters in state forest and preventative measures are selected. The forest management plan is the planning document where soil protection measures are defined and monitoring results incorporated into planning and operational practice. Prevailing practice is to include in the agreements with contractors the requirement to inform the forest owner about observed potential negative impacts of forest operation to biodiversity and ecosystems and to take preventative measures to avoid or minimise it. The State Forest Service periodically controls how forest operations in cutting areas are being or have been implemented according to existing legal acts. The State Forest Service has an annual control plan where the aspect and places to be checked are listed (2014 annual control plan).</p> |
| Means of Verification | <ul style="list-style-type: none"> <li>• Regional Best Management Practices</li> <li>• Supply contracts</li> <li>• Records of biomass producer's field inspections</li> <li>• Assessment at an operational level of measures designed to minimize impacts on the values identified</li> <li>• Monitoring records</li> <li>• Publicly available information on the protection of soil</li> <li>• Level of enforcement</li> </ul>  |
| Evidence Reviewed     | <ul style="list-style-type: none"> <li>• <a href="#">Regulations on private forests management and use</a> (Decision of the Government, 1997-07-24, No. 799)</li> <li>• <a href="#">Regulations on forest cuttings</a> (Order of Minister of Environment, 2010-01-27, No. D1-79)</li> <li>• <a href="#">National Program on Development of Forest Sector 2012-2020</a> (Decision of the Government, 2012-05-23, No. 569)</li> <li>• <a href="#">Regulations on marking and evaluation of forest cutting area</a> (Order of Minister of Environment, 2004-11-10, No. D1-577)</li> <li>• <a href="#">Law on Forest</a> (1994-11-22, Nr. I-671)</li> <li>• <a href="#">Order No D1-199 of the Minister of Environment of 14 April 2008 "Regulation on Reforestation and Planting"</a> (Lithuanian version)</li> </ul>   |
| Risk Rating           | <input checked="" type="checkbox"/> <b>Low risk</b> <input type="checkbox"/> <b>Specified risk</b> <input type="checkbox"/> <b>Unspecified risk</b>  |

|                       | Indicator   |
|-----------------------|---|
| 2.2.3                 | Key ecosystems and habitats are conserved or set aside in their natural state.  |
| Finding               | <p>Management activities in high conservation value forest is regulated by the Nature Conservation Act, the Forest Act and related acts and regulations.</p> <p>Lithuania forest is well surveyed and all major HCV areas are identified. All data about different type of protected species, areas and object are collected and stored in the state owned database, Forest statistics of the State Forest Service under the Ministry of Environment.</p> <p>By 1 January 2015, the national network of protected areas covered 1,027,600 ha or 15.7% of the total Lithuanian territory. Natura 2000 sites covered 812,500 ha at the beginning of 2015, accounting for 12.4% of the country's territory. According to forest statistics 2014 there are the following protection areas in Lithuania: five national parks, 30 regional parks, one biosphere reserve, 28 biosphere polygons, 111 municipal reserves, 279 state reserves, and six state strict reserves.</p> <p>All the important key ecosystems are under some kind of protection, under some protection regime or classified under WKH. Risks related to WKH are described under 2.1.2</p> <p>According to the Environmental Inspectorate there are no major violations in protected areas.</p> <p>For more details about the key ecosystems and habitats see also the findings under indicators 2.1.2 and 2.1.1.</p> |
| Means of Verification | <ul style="list-style-type: none"> <li>• Guidance provided by biomass producers to suppliers/forest operators, regarding threats to the identified forests and areas of high conservation values, and verification of conformance through field inspections</li> <li>• Spatial information Portal (<a href="http://www.geoportal.lt">www.geoportal.lt</a>) maps</li> <li>• Public forest registry: IMŪEPIS (Intelligent Information System for Electronic Forestry Services) Guidance provided by BPs to suppliers/forest operators, regarding threats to the identified forests and areas of high conservation values, and verification of conformance through field inspections</li> <li>• Regional Best Management Practices</li> <li>• Standard Operating Procedures</li> <li>• Codes of Practice</li> <li>• Records of biomass producer's field inspections</li> <li>• Monitoring records</li> </ul>   |
| Evidence Reviewed     | <ul style="list-style-type: none"> <li>• Environment of the Republic of Lithuania)</li> <li>• <a href="#">Biodiversity conservation strategy and action plan</a> (1998, Ministry of Environment of the Republic of Lithuania).</li> <li>• <a href="#">Law on Forest</a> (1994-11-22, Nr. I-671)</li> <li>• <a href="#">Regulations and schedule of procedures on assigning the forests to forest categories</a> (2001-09-26 No. 1171, Decision of The Government).</li> <li>• <a href="#">Low on Protected Areas</a> (1993-12-09 No. I-301)</li> <li>• <a href="#">Baltic Forest Mapping</a> (2003).</li> <li>• Lithuanian Spatial information Portal (<a href="http://www.geoportal.lt">www.geoportal.lt</a>).</li> <li>• <a href="http://www.natura2000info.lt">www.natura2000info.lt</a></li> <li>• Lithuanian National Forest Inventory 2008-2010. Forest resources and their dynamics (2010, Ministry of Environment of the Republic of Lithuania)</li> <li>• <a href="#">Audit of past and ongoing natural areas inventory and mapping projects, methods and results in Lithuania.</a> (2010, Nature Research Centre)</li> </ul>  |
| Risk Rating           | <input checked="" type="checkbox"/> <b>Low risk</b> <input type="checkbox"/> <b>Specified risk</b> <input type="checkbox"/> <b>Unspecified risk</b>   |

|                       | Indicator  |
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| 2.2.4                 | Biodiversity is protected.   |
| Finding               | <p>The Law on Forests states that for management purposes Lithuanian forest is divided into four groups (forest reserves, special-purpose forest, protective forest, and exploitative forest). Forest cuttings are allowed depending on the management and protection regime, which is based on the forest category. The management of established protected areas is regulated by the Law on Protected Areas. It states that the main legal documents regulating the protection and management regime of protected areas are: Law on Protected Areas, Regulations of individual protected area, the planning documents of individual protected area, the individual regulation of protected objects or selective areas, and contracts on protection. The management of Lithuanian forest according to the Law on Forests is based on a forest management plan, which includes a special section on nature protection measures where the protected species, habitats and other environmental protection values or objects are listed, and marked on the maps with prescribed and detailed protection measures. The statistical information on Lithuanian protected areas, and rare and endangered species found in Lithuanian forest and other relevant data can be found on the website of the <a href="#">State Forest Service</a>. The regulations on the preparation of forest management schemes and forest management plans states that a forest management plan for state forest must include sections related to forest protection against fires, sanitary protection, biodiversity protection, and recreational and social functions of forest. The forest management plan for private forest must have a special section related to forest protection and implementation of requirements for environmental protection. The forest operations must be planned and implemented following requirements set out in the regulations on forest cuttings. There are provisions in the regulations for seasonal harvesting operations according to the forest groups (for instance, in some forest of groups II and III final cuttings are not allowed from 1 March until 1 April). There are requirements for the protection of nesting places of rare and endangered bird species as well as detailed requirements to leave trees and dead wood for biodiversity protection in logging sites. The maintenance of buffer zones along watercourses or open areas as well as some limitation in relation to protection of soil against erosion is foreseen in the regulations on forest cuttings as well. Forest management plans are prepared for ten year periods and include analyses, monitoring results and the description of the impact of management of previous period. During the preparation process of a new management plan all relevant data must be collected and together with analyses of the previous management cycle must be fed into the new management plan and consequently into the operational practice. The requirements for forestry machinery are defined in the regulations on the evaluation of compliance of tractors, trailers and other machines in agriculture and forestry. State forest enterprises constantly check how forest operations are performed in state forest, and whether they follow the environmental requirements stated in the planning documents and logging permissions. The State Forest Service periodically controls how the application of legal acts focused on protecting natural values, objects and protected areas are implemented. The State Forest Service has an annual control plan where the aspect and places to be checked are listed (<a href="#">2014 annual control plan</a>). In addition, the regional offices of the Environmental Protection Agency periodically control how the management and application of legal requirements for protection are implemented in management units. Based on the reports produced by the mentioned authorities it is evident that there is no identified systematic and/or large scale non-compliance with legally required environmental protection measures to an extent that threatens the forest resources or other environmental values such as biodiversity.</p> |
| Means of Verification | <ul style="list-style-type: none"> <li>• Regional Best Management Practices;</li> <li>• Supply contracts;</li> <li>• Assessment of potential impacts at operational level and of measures to minimize impacts;</li> <li>• Monitoring results;</li> <li>• Publicly available information on the protection of the values identified;</li> <li>• Level of enforcement</li> <li>• Regional, publicly available data from a credible third party</li> <li>• Spatial information Portal (<a href="http://www.geoportal.lt">www.geoportal.lt</a>) maps</li> <li>• Public forest registry: IMŪEPIS (Intelligent Information System for Electronic Forestry Services)</li> </ul>   |
| Evidence Reviewed     | <ul style="list-style-type: none"> <li>• <a href="#">The Law on Protected Areas</a> (1993-11-09, No. I-301)</li> <li>• <a href="#">Law on Environmental Protection</a> (1992-01-21, No. I-2223)</li> <li>• <a href="#">National Program on Development of Forest Sector 2012-2020</a> (Decision of the Government, 2012-05-23, No. 569)</li> <li>• <a href="#">Law on Protected Animals, Plants, Mushrooms Species and Habitats</a> (2009-12-17, No. XI-578)</li> <li>• <a href="#">Law on Wild Plants</a> (1999-06-15, No. VIII-1226)</li> <li>• <a href="#">Law on Wild Animals</a> (1997-11-06, No. VIII-498)</li> <li>• <a href="#">Regulations on common habitats or areas important for birds protection</a> (Decision of the Government, 2011-05-25, No.</li> </ul>   |

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|             | <p>614)</p> <ul style="list-style-type: none"> <li>• <a href="#">Regulations on forest cuttings</a> (Order of Minister of Environment, 2010-01-27, No. D1-79)</li> <li>• <a href="#">Special land and forests use conditions</a> (Decision of the Government, 1992-05-12, No. 343)</li> <li>• <a href="#">Regulations on defining the protection zones of water bodies and protection belts of coastal areas</a> (Order of Minister of Environment, 2007-02-14, No. D1-98)</li> <li>• <a href="#">The list of Red Book of plant habitats</a> (Order of Minister of Environment, 1998-11-30, No. 237)</li> <li>• <a href="#">Regulations on preparation of forest management schemes and forest management plans</a> (Order of Minister of Environment 2010-06-30, No. D1-577)</li> <li>• <a href="#">Regulations on evaluation of compliances of tractors, its trailers and other machines in agriculture and forestry</a> (Order of Minister of Agriculture, 2004-12-29, No. 3D-685)</li> </ul> |
| Risk Rating | <input checked="" type="checkbox"/> <b>Low risk</b> <input type="checkbox"/> <b>Specified risk</b> <input type="checkbox"/> <b>Unspecified risk</b>  |

|                       | Indicator  |
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| 2.2.5                 | The process of residue removal minimises harm to ecosystems.   |
| Finding               | The forest operations must be planned and implemented according to the requirements set out in the regulations on forest cuttings. In the regulation of forest cuttings the technological requirements for the extraction of biomass in order to protect ecosystems are clearly defined. For instance the time and the season for extraction according to forest site, the use of skidding roads, places to store biomass, ban on burning biomass in forests and extracting it from certain forest site types (with poor soil layer) or from forests of group II etc. Prevailing practice is to include in the agreements with contractors the requirement to inform the forest owner about observed potential negative impacts of forest operation on biodiversity and ecosystems and to take preventative measures to avoid or minimise it. The State Forest Service periodically controls how forest operations in cutting areas are being or have been implemented according to existing legal acts. The State Forest Service has an annual control plan where the aspect and places to be checked are listed ( <a href="#">2014 annual control plan</a> ). The forest management plan, the planning documents of individual protected areas, and the individual regulation of protected objects or selective areas define the requirements and procedures to prevent damage to ecosystems while extracting the timber, for instance in certain areas cutting activities are only allowed when the soil surface is frozen. The cutting activities in protected areas must be agreed with the relevant authorities (state or regional park administrations, protected areas authorities, etc.). Before cutting, the preliminary environmental impact assessment is carried out by foresters in state forest and preventative measures are selected. The forest management plan is the planning document where ecosystem protection measures are defined and monitoring results incorporated into planning and operational practice. The monitoring data and forest inventory records of the last decade indicate that the total forest coverage has increased, the cutting rate has always been lower than the forest increment and the data about structure of forest stands according to forest sites does not show a tendency for an increase in poor forest stands. |
| Means of Verification | <ul style="list-style-type: none"> <li>• Regional Best Management Practices</li> <li>• Supply contracts</li> <li>• Records of biomass producer's field inspections</li> <li>• Assessment at an operational level of measures designed to minimise impacts on the values identified</li> <li>• Monitoring records</li> </ul>  |
| Evidence Reviewed     | <ul style="list-style-type: none"> <li>• <a href="#">Regulations on private forests management and use</a> (Decision of the Government, 1997-07-24, No. 799)</li> <li>• <a href="#">Regulations on forest cuttings</a> (Order of Minister of Environment, 2010-01-27, No. D1-79)</li> <li>• <a href="#">National Program on Development of Forest Sector 2012-2020</a> (Decision of the Government, 2012-05-23, No. 569)</li> <li>• <a href="#">Regulations on marking and evaluation of forest cutting area</a> (Order of Minister of Environment, 2004-11-10, No. D1-577)</li> <li>• <a href="#">Law on Forest</a> (1994-11-22, Nr. I-671)</li> <li>• <a href="#">Order No D1-199 of the Minister of Environment of 14 April 2008 "Regulation on Reforestation and Planting"</a> (Lithuanian version)</li> </ul>   |
| Risk Rating           | <input checked="" type="checkbox"/> <b>Low risk</b> <input type="checkbox"/> <b>Specified risk</b> <input type="checkbox"/> <b>Unspecified risk</b>  |

|                       | Indicator  |
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| 2.2.6                 | Negative impacts on ground water, surface water, and water downstream from forest management are minimised.  |
| Finding               | <p>The Law on Water regulates the protection and monitoring of water resources (including watercourses in forest) in Lithuania. The Law on Forests states that for management purposes Lithuanian forest is divided into four groups (forest reserves, special-purpose forest, protective forest, and exploitative forest). One of the functions of protective forest is to maintain the water protection functions of the forest. A special management regime is set out in the forest management plans or management documents of protected areas where such forest is located in order to protect water bodies from damage, pollution, etc. Forest cuttings are allowed depending on the management and protection regime of the particular forest group. Special forest management regulations apply to forest, such as raising the cutting age and limiting felling techniques to provide critical ecosystem services such as soil, air, water and man's living environment protection. The maintenance of buffer zones along watercourses or open areas is foreseen in the regulations on forest cuttings. For instance, the final forest cuttings are not allowed on the slopes along watercourses with an angle of more than 10° and on any slopes with an angle of more than 45°. Forest cuttings targeted to maintain biodiversity and to regulate special areas around watercourses are defined in the regulations on forest cuttings. Regulations on the evaluation of compliance of tractors, trailers and other machines in agriculture and forestry set out the requirements for forest machinery in order for it to be technically sound and prevent possible damage to the environment, including watercourses. In addition, the regulations on forest cuttings define the requirements of preparation for forest cuttings and the use of skidding roads in order to protect soil and water streams. The preliminary assessment of the cutting area is made by state forest officials, contractors and private forest owners in order to evaluate the cutting area and discuss and agree the use of forest cutting techniques taking into account the special conditions of cutting area, including protection of water streams by avoidance of forest techniques, distribution of skidding roads etc. The forest management plan, the planning documents of the individual protected area, and the individual regulation of protected objects or selective areas define the requirements and procedures to prevent damage to ecosystems and watercourses while extracting timber, for instance in certain areas cutting activities are only allowed when the soil surface is frozen. The State Forest Service periodically controls how forest operations in cutting areas are being or have been implemented according to the existing legal acts. The State Forest Service has an annual control plan where the aspect and places to be checked are listed (<a href="#">2014 annual control plan</a>).</p> |
| Means of Verification | <ul style="list-style-type: none"> <li>• Regional Best Management Practices</li> <li>• Supply contracts</li> <li>• Records of biomass producer's field inspections</li> <li>• Assessment at an operational level of measures designed to minimize impacts on the values identified</li> <li>• Monitoring records</li> <li>• Inquiry from Environmental Inspectorate</li> <li>• Publicly available information on the protection of soil</li> <li>• Level of enforcement</li> </ul>   |
| Evidence Reviewed     | <ul style="list-style-type: none"> <li>• <a href="#">Law on Water</a> (1997-10-21 d. Nr. VIII-474)</li> <li>• <a href="#">National Program on Development of Forest Sector 2012-2020</a> (Decision of the Government, 2012-05-23, No. 569)</li> <li>• <a href="#">Regulations on evaluation of compliances of tractors, its trailers and other machines in agriculture and forestry</a> (Order of Minister of Agriculture, 2004-12-29, No. 3D-685)</li> <li>• <a href="#">Law on Environmental Protection</a>, 21 January 1992 No I-2223</li> <li>• <a href="#">Law on Forest</a> (1994-11-22, Nr. I-671)</li> </ul>   |
| Risk Rating           | <input checked="" type="checkbox"/> <b>Low risk</b> <input type="checkbox"/> <b>Specified risk</b> <input type="checkbox"/> <b>Unspecified risk</b>  |

|                       | Indicator   |
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| 2.2.7                 | Air quality is not adversely affected by forest management activities.  |
| Finding               | The Law on Ambient Air Pollution regulates the protection, management and monitoring of ambient air pollution. There is no indication of any damage to or influence on air quality from forest operations. The cutting technique and its use does not cause an impact on air quality. Usually forest operations are in remote places and do not affect the air quality. The monitoring and statistical data on air quality and its tendency can be found on the website of the Environmental Protection Agency. In the regulation of forest cuttings the technological requirements are clearly defined and which prevent the burning of biomass in the forest. The requirements for forestry machinery are defined in the regulations on evaluation of compliance of tractors, its trailers and other machines in agriculture and forestry, which defines the standard for forest machinery in order for it not to damage the environment. The Environmental Protection Agency is the responsible institution for ambient air monitoring. The monitoring procedures, functions and data can be found on the website of the <a href="#">Environmental Protection Agency</a> . The State Forest Service periodically controls how forest operations in cutting areas are being or have been implemented according to the existing legal acts. The State Forest Service has an annual control plan where the aspect and places to be checked are listed ( <a href="#">2014 annual control plan</a> ). |
| Means of Verification | <ul style="list-style-type: none"> <li>• Regional Best Management Practices</li> <li>• Supply contracts</li> <li>• Records of biomass producer's field inspections</li> <li>• Assessment at an operational level of measures designed to minimise impacts on the values identified</li> <li>• Monitoring records</li> <li>• Interviews with staff</li> <li>• Level of enforcement</li> <li>• Regional, publicly available data from a credible third party</li> <li>• The existence of a strong legal framework in the region</li> </ul>  |
| Evidence Reviewed     | <ul style="list-style-type: none"> <li>• <a href="#">Law on Ambient Air Protection</a> (1999-11- 4 d. Nr. VIII-1392)</li> <li>• <a href="#">National Program on Development of Forest Sector 2012-2020</a> (Decision of the Government, 2012-05-23, No. 569)</li> <li>• <a href="#">Law on Environmental Protection</a>, 21 January 1992 No I-2223</li> <li>• <a href="#">Law on Forest</a> (1994-11-22, Nr. I-671)</li> <li>• The Normative of Ambient Air Pollution, December 11, 2001 (decree of the minister of environment and the minister of health protection No 591/640)</li> <li>• <a href="#">Data on State ambient air monitoring</a> (Environmental Protection Agency)</li> <li>• <a href="#">Regulations on evaluation of compliances of tractors, its trailers and other machines in agriculture and forestry</a> (Order of Minister of Agriculture, 2004-12-29, No. 3D-685)</li> </ul>  |
| Risk Rating           | <input checked="" type="checkbox"/> <b>Low risk</b> <input type="checkbox"/> <b>Specified risk</b> <input type="checkbox"/> <b>Unspecified risk</b>   |

|                       | Indicator   |
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| 2.2.8                 | There is controlled and appropriate use of chemicals, and that Integrated pest management (IPM) is implemented wherever possible in forest management activities.   |
| Finding               | <p>The Law on Plant Protection defines the procedures for registration, import, use, storage, protection measures, informing the public, and control of the use of pesticides and other chemicals for plant protection. The Law clearly states that the pesticides and other chemicals for plant protection cannot be used in recreational forest. Their use in protected areas and the territories of the Natura 2000 network is regulated by the Government. All plant protection products must be registered according to the defined procedures. Information about registered plant protection products can be found online in the database "<a href="#">Plant protection products</a>". The <a href="#">list of the plant protection products allowed to use in the forests</a> can be found on the website of the State Forest Service. The State Plant Service under the Ministry of Agriculture is responsible for registration, control and legislation enforcement of the plant protection products. The use of chemicals is very strictly regulated in state forest. The decree of the director of the Directorate General of State Forests defines the permissible amount of chemicals to be used in state forest enterprises. This amount is calculated based on necessary conditions for forest protection against disease and other natural calamities and is focused on reducing the permissible amount. Following this decree every state forest enterprise has its own annual plan for the use of chemicals and the plan for reduction of the use of chemicals. The use of chemicals in private forest is not very common, however they are required to follow the general legislation related to plant protection products. According to the defined regulations in the state forest enterprises there are responsible personnel, who are involved in the use and storage of chemicals and have relevant qualifications (documents which prove completion of relevant training on the use of chemicals). The Directorate General of State Forests annually collects reports about the use and storage of chemicals in state forest enterprises. In addition, the State Forest Service periodically controls how forest operations in cutting areas are being or have been implemented according to existing legal acts. The State Forest Service has an annual control plan where the aspect and places to be checked are listed (<a href="#">2014 annual control plan</a>).</p> |
| Means of Verification | <ul style="list-style-type: none"> <li>• Existing legislation</li> <li>• Level of enforcement</li> <li>• Regional Best Management Practices</li> <li>• Supply contracts</li> <li>• Records of biomass producer's field inspections</li> <li>• Assessment at an operational level of measures designed to minimize impacts on the values identified</li> <li>• Monitoring records</li> <li>• Interview with Environmental Inspectorate</li> </ul>  |
| Evidence Reviewed     | <ul style="list-style-type: none"> <li>• <a href="#">Law on Plant Protection</a>, October 19, 1995, No. I-1069</li> <li>• <a href="#">On line database of registered plant protection products</a></li> <li>• Regulations on efficiency and (or) selectivity tests of good plant protection products, December 21, decree of the minister of agriculture No. 3D-935</li> <li>• <a href="#">State Plant Service information</a></li> <li>• <a href="#">The Law on Protected Areas</a> (1993-11-09, No. I-301)</li> <li>• <a href="#">Law on Forest</a> (1994-11-22, Nr. I-671)</li> <li>• <a href="#">List of the plant protection products allowed to use in the forests</a></li> <li>• <a href="#">National Program on Development of Forest Sector 2012-2020</a> (Decision of the Government, 2012-05-23, No. 569)</li> </ul>   |
| Risk Rating           | <input checked="" type="checkbox"/> <b>Low risk</b> <input type="checkbox"/> <b>Specified risk</b> <input type="checkbox"/> <b>Unspecified risk</b>   |



|                       | Indicator   |
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| 2.2.9                 | Methods of waste disposal minimise negative impacts on forest ecosystems.   |
| Finding               | <p>The Law on Waste Management defines the waste as “various substances and articles belonging to the category of waste, pursuant to the classifier of waste set forth in paragraph 2 of Article 8 of the Law on Waste Management, which are disposed by the holder of waste, which he wishes to dispose or must dispose”. The management, functions of responsible institutions, monitoring, and storage and other waste management procedures are defined in that Law. The State Program on Waste Prevention sets the goals, measures and monitoring procedures for waste reduction and prevention based on analyses. The impact on the environment at the operational level related to waste in the forest is quite low. In state forest enterprises prevailing practice is to check the cutting and other areas where forest activities are foreseen before and after work carried out by responsible persons and to ensure that no waste is disposed of and that all legal requirements and good practice is followed. In addition, the State Forest Service periodically controls how forest operations in cutting areas are being or have been implemented according to the existing legal acts. The State Forest Service has an annual control plan where the aspect and places to be checked are listed (<a href="#">2014 annual control plan</a>). The forest management plan, the planning documents of individual protected area, and the individual regulation of protected objects or selective areas define the requirements and procedures to prevent waste disposal in the forest. The waste prevention problem exists in forest nearby cities and recreational objects, which are often visited by the general public. Prevailing practice is that the state forest enterprises have agreements with waste management companies for waste collection and transportation from forest and recreational sites. In addition, regional departments of the Environmental Protection Agency periodically control waste disposal in the forest and in case of legal violation it will take appropriate measures. During public awareness campaigns every spring, the state forest enterprises organise special events together with municipalities and NGOs in order to remove the waste from forest, including private forest. In order to address the waste problem in forest nearby cities and in general the methodology of calculation of compensation for damage to the environment was updated and increased the penalties associated with waste disposal in the forest. The compensation amount was substantially increased (more than ten times) and the waste was categorised into two categories: hazardous and not hazardous.</p> |
| Means of Verification | <ul style="list-style-type: none"> <li>• Regional Best Management Practices</li> <li>• Supply contracts</li> <li>• Operational Assessment of potential impacts and of measures to minimise impact</li> <li>• Monitoring results</li> </ul>  |
| Evidence Reviewed     | <ul style="list-style-type: none"> <li>• <a href="#">Law on Environmental Protection</a>, 21 January 1992 No I-2223</li> <li>• <a href="#">Law on Waste Management</a>, June 16, 1998 No. VIII-787</li> <li>• <a href="#">State Program on Waste Prevention</a>, October 22, 2013, decree of the minister of environment No. D1-782</li> <li>• <a href="#">The methodology of calculation of amount to compensate the damage to environment</a>, (decree of the minister of environment, September 9, 2002 No. 471)</li> <li>• <a href="#">Law on Forest</a> (1994-11-22, Nr. I-671)</li> <li>• <a href="#">National Program on Development of Forest Sector 2012-2020</a> (Decision of the Government, 2012-05-23, No. 569)</li> </ul>   |
| Risk Rating           | <input checked="" type="checkbox"/> <b>Low risk</b> <input type="checkbox"/> <b>Specified risk</b> <input type="checkbox"/> <b>Unspecified risk</b>   |

|                       | Indicator  |
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| 2.3.1                 | Analysis shows that feedstock harvesting does not exceed the long-term production capacity of the forest, avoids significant negative impacts on forest productivity and ensures long-term economic viability. Harvest levels are justified by inventory and growth data.  |
| Finding               | <p>The National Program on Development of Forest Sector 2012-2020 states that during the last decade the cutting rate in Lithuanian forest comprised around 5.7-7.4 million m<sup>3</sup>. The amount is in line with the sustainable development principle where the cutting rate does not exceed the annual increment and allows the potential to meet the long-term economic, social and environmental needs. During the last decade the mean volume per ha increased by 13 m<sup>3</sup> and today has reached 237 m<sup>3</sup>/ha. The total accumulated stand volume in Lithuanian forest is 490 million m<sup>3</sup>, which means that since 2001 it has increased by 38 million m<sup>3</sup>. In addition, the mean increment increased from 16.1 million m<sup>3</sup> to 16.6 million m<sup>3</sup>. It demonstrates the potential for the biomass market to operate according to the sustainability criteria. The statistical data on forest use and forest increment is calculated using forest inventory and monitoring data. The statistical information (including growth/drain, inventory, mortality, and age class distribution according to ownership type, administrative boundaries and other criteria) can be found online on the website of the <a href="#">State Forest Service</a>, which is responsible for the forest inventory and statistical information. The analyses of the last decade (2003-2012) show that the gross mean annual increment in Lithuanian forest was 17.80 million m<sup>3</sup>, the volume of mean cuttings was 8.97 million m<sup>3</sup> and the accumulation per year was 5.89 million m<sup>3</sup>. The main planning document where the assessment of inventory data and subsequent planning, implementation and monitoring are defined for forest owners is the forest management plan. The regulations on preparation of forest management schemes and forest management plans define the procedures for preparation, approval, update, registration, content, and quality review of forest management plans for both state and private forest owners. Forest management plans are prepared for a ten year period and include forest inventory analyses, monitoring results and a description of the impact of forest management during the previous period. During the preparation process of a new management plan all relevant data must be collected and together with analyses of the previous management cycle must be fed into new management planning and consequently into operational practice. The detailed procedures defining the cutting rate of main forest cuttings in state and private forest are set in the methodology for defining the amount of main forest harvesting. The cutting rate is calculated by the Institute of Forest Management. For calculating the cutting rate in accordance with age class forest of groups III and IV the mathematical model, OPTINA, is used. In forest of group II the volume of mature forest stands is divided by the cutting period. The cutting annual rate in state forest must be approved by the Government and distributed by the Minister of Environment and it must always be lower than that defined in the forest management plan. At the operational level there is strict control of cutting volume and areas set out in the cutting technological card. Responsible persons from state forest enterprises periodically check the cutting area before, during and after activities in order to ensure that the allowed cutting rate is being followed. The State Forest Service periodically controls how forest operations in cutting areas are being or have been implemented according to the existing legal acts. The State Forest Service has an annual control plan where the aspect and places to be checked are listed (<a href="#">2014 annual control plan</a>).</p> |
| Means of Verification | <ul style="list-style-type: none"> <li>Harvesting records, inventory and growth data and yield calculations, and Operational Practice indicate that biomass feedstock harvesting rates avoid significant negative impacts on forest productivity and long-term economic viability</li> </ul>   |

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| <p>Evidence Reviewed</p> | <ul style="list-style-type: none"> <li>• <a href="#">Regulations on private forests management and use</a> (Decision of the Government, 1997-07-24, No. 799)</li> <li>• <a href="#">Methodology on defining the amount of main forest cuttings</a> (Order of Minister of Environment, 2008-07-02, No. D1-362)</li> <li>• <a href="#">Regulations on forest cuttings</a> (Order of Minister of Environment, 2010-01-27, No. D1-79)</li> <li>• <a href="#">National Program on Development of Forest Sector 2012-2020</a> (Decision of the Government, 2012-05-23, No. 569)</li> <li>• <a href="#">Schedule of procedures on forest cuttings in private forests estates without forest management plan</a> (Order of Minister of Environment, 2004-11-08, No. D1-569)</li> <li>• <a href="#">Schedule of procedures on forest cutting in forests reserved for privatization</a> (Order of Minister of Environment, 2002-04-30, No. 219)</li> <li>• <a href="#">Regulations on forest cuttings for technological and commercial purposes in forest sector</a> (Order of Minister of Environment, 2002-04-03, No. 145)</li> <li>• <a href="#">Law on Forest</a> (1994-11-22, Nr. I-671)</li> <li>• <a href="#">Rules on state forest inventory, forest management planning, inventory data gathering, data management and data submission to forest owners and managers</a> (Order of Lithuanian Minister of Environment, 2001-07-02, No. 352).</li> <li>• <a href="#">National Program on Development of Forest Sector 2012-2020</a> (Decision of the Government, 2012-05-23, No. 569)</li> <li>• <a href="#">Annual cutting amount in state forests for 2009-2013</a>, decree of the Government, November 17, 2010 No. 1621</li> <li>• <a href="#">Annual cutting amount distribution in state forests for 2009-2013</a>, decree of the minister of Environment, November 25, 2011, No. D1-910</li> <li>• <a href="#">Annual cutting amount in state forests for 20141-2018</a>, decree of the Government, April 10, 2010 No. 304</li> </ul> |
| <p>Risk Rating</p>       | <p><input checked="" type="checkbox"/> <b>Low risk</b>                      <input type="checkbox"/> <b>Specified risk</b>                      <input type="checkbox"/> <b>Unspecified risk</b></p>   |

|                       | Indicator  |
|-----------------------|--|
| 2.3.2                 | Adequate training is provided for all personnel, including employees and contractors.  |
| Finding               | <p>The analyses made in the National Program on Development of Forest Sector state that today there are sufficient qualified forest specialists working in the forest sector in order to achieve the main goals of the forest development program. There is the tendency that the number of specialists in the forest sector are university graduates, and therefore the level of education in the sector is improving. However, during the last decade the demand for forest specialists with a university or higher education background decreased slightly, while the demand in the market for professional specialists such as harvest and forwarder operators has increased. For detailed statistical information concerning forest employees and their qualifications, the trends for recent years can be found on the website of the <a href="#">State Forest Service</a>. The educational system in Lithuania provides a broad scope of education, training and scientific knowledge for the forest sector. Every year the state forest enterprises must analyse the training and qualifications demand and prepare an annual training plan for its specialists and workers. The plan must take into account the employees' needs as well as necessary qualification requirements related to their duties and responsibilities. In addition, according to the health and safety legislation, every new employee must be inducted with the relevant safety instructions and must annually update their skills on safety and health requirements by attending special courses or receiving instructions; proof must be provided by corresponding documents and training records. Many forest cuttings and other forest activities in state and private forest are performed by contractors, these contractors are obliged to have the necessary qualifications and corresponding documents. When state forest enterprises organise the tender for work they request documents proving the contractors' qualifications, as well as other skills needed for the job. The order on forest work safety requires that every forest worker must have the necessary qualifications and corresponding documents. The state forest enterprises and contractors are periodically controlled by the State Labour Inspection, the State Forest Service, authorities of fire protection, Directorate General of State Forests, regional offices of Environmental Protection Agency, and other controlling institutions to ensure all workers have the necessary qualifications, skills, and corresponding documents. The prevailing practice is to include in the agreement with contractors the requirements to have necessary qualifications. Since 2003 the state forest enterprises provide free consultations and various courses related to forest activities to private forest owners. In addition, state forest enterprises can provide different services to private forest owners: prepare reforestation project, forest planting, provision with seedlings and saplings, taking care of planted forests, and other services. Information about training, courses and services provided to private forest owners are publicly available on the website of relevant institutions. The Training Program on Multipurpose Forest Use defines the goals, means, structure and procedures for training private forest owners in order for them to have the necessary knowledge and skills about forest activities. All state forest enterprises in Lithuania facing the obligations of the EU Timber Regulation decided to evaluate and strengthen their due diligence systems for producing legal timber. Due diligence systems in the state forest enterprise are based on a risk assessment assigning a specified risk in the area of health and safety. Therefore every state forest enterprise has prepared a risk mitigation plan in which one of the measures is to ask contractors on site to prove their qualifications (documents or its copies), and those of new workers.</p> |
| Means of Verification | <ul style="list-style-type: none"> <li>• Existing legislation</li> <li>• Level of enforcement</li> <li>• Supply contracts</li> <li>• Records of biomass pricer's field inspections</li> <li>• Monitoring records</li> <li>• Interviews with staff</li> <li>• Training plans, training records, and records of qualifications</li> </ul>  |
| Evidence Reviewed     | <ul style="list-style-type: none"> <li>• <a href="#">Law on Forest</a> (1994-11-22, Nr. I-671)</li> <li>• <a href="#">National Program on Development of Forest Sector 2012-2020</a> (Decision of the Government, 2012-05-23, No. 569)</li> <li>• <a href="#">Labour Code of the Republic of Lithuania</a> (2002.06.04, IX-926)</li> <li>• <a href="#">Law on Safety and Health at Work</a> (2003.07.01, IX-1672)</li> <li>• <a href="#">Law on the State Labour Inspectorate of the Republic of Lithuania</a> (2003.10.14, IX-1768)</li> <li>• <a href="#">Order on forest work safety</a> (1996.11.25, 208)</li> <li>• <a href="#">The Training Program on Multipurpose Forest Use</a>, 9 September, 2011, decree of the minister of Environment Nr. D1-697</li> </ul>   |
| Risk Rating           | <input checked="" type="checkbox"/> <b>Low risk</b> <input type="checkbox"/> <b>Specified risk</b> <input type="checkbox"/> <b>Unspecified risk</b>  |

|                       | Indicator  |
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| 2.3.3                 | Analysis shows that feedstock harvesting and biomass production positively contribute to the local economy including employment.   |
| Finding               | <p>Lithuanian Forest Policy and its implementation strategy state that forest is one of the main Lithuanian natural resources having economic, social and ecological value. In the policy it is mentioned that in 2001 the Lithuanian forest sector (including forest industry) contributed around 3.6% to the national economy, some 0.6% of Gross Domestic Product (GDP). State forest enterprises pay, in the form of various taxes and royalties, around 100-130 million Lt. to the state budget annually. Today, forest occupies around 2 million ha or 33 % of the country's territory. The total timber volume in the forest reaches around 371.7 million m<sup>3</sup>. Forest resources during the last 50 years have steadily increased and can at this time sustainably meet public needs. The National Program on Development of Forest Sector for 2012-2020 provides similar indicators related to the forest sector contribution to the local economy, namely: the forest sector's (including forest industry) contribution to the national economy annually comprises 3-4%, some 0.5-0.6% of GDP. However, the number of employees working in the forest sector during the last ten years has decreased by 2,000. In addition, the audit report of the State Inspectorate of the Government of Lithuania (2010) states that in 2008 the GDP in Lithuania was 111.5 billion Lt, out of which 3.2% or 3.6 billion Lt was contributed by the forest sector. The 42 state forest enterprises manage capital of a total value of 230 million Lt (excluding land and forest value) with around 400 million Lt. in expenditures. The general profitability of state forest enterprises fluctuates between 5.4% and 36%. Taking into account the statistical data about the forest sector contribution to the local economy during the last ten years and the forecast for the coming ten years it is clear that the forestry sector remains one of the key contributors to the local economy. Statistical data on state forest as well as the economic and commercial indicators and perspective plans of the state forest sector can be found on the website of the <a href="#">Directorate General of State Forests</a>. In addition, The National Program on Development of Forest Sector for 2012-2020 sets the task to increase, annually, the production of biomass from cuttings residues. Taking into account the mentioned task, the biomass production for 2014-2018 for state forest enterprises was approved by the Minister of Environment, which set the goal to increase the biomass production and its contribution to the local economy. The private forest sector also actively participates in the timber production process. For instance, in the period 2007-2013 in the form of various projects, the private sector received financial support to acquire the biomass production machinery accumulating 11.44 million Lt. The annual total forest cuttings comprised around 7 million m<sup>3</sup>, while the export of timber and its products comprised around 10% of GDP. The analyses of the forest sector provided in the National Program on Development of Forest Sector 2012-2020 state that private forest owners in 2010 paid about 12 million Lt in tax for sold round wood or standing forest. The tax burden for private forest owners has decreased slightly since 2010 due to the abolition of additional social security tax (of 6%) for physical entities selling round wood and by decreasing to 5% the tax on persons with individual activity. State forest enterprises additionally pay 5% income tax from sold commercial timber and standing forests to the state budget.</p> |
| Means of Verification | <ul style="list-style-type: none"> <li>Analysis of contribution</li> </ul>   |
| Evidence Reviewed     | <ul style="list-style-type: none"> <li><a href="#">Law on Forest</a> (1994-11-22, Nr. I-671)</li> <li><a href="#">National Program on Development of Forest Sector 2012-2020</a> (Decision of the Government, 2012-05-23, No. 569)</li> <li><a href="#">Lithuanian Forest Policy and its Implementation Strategy</a>, September, 2002 decree of the minister of environment No. 484</li> </ul>   |
| Risk Rating           | <input checked="" type="checkbox"/> <b>Low risk</b> <input type="checkbox"/> <b>Specified risk</b> <input type="checkbox"/> <b>Unspecified risk</b>  |

|                       | Indicator   |
|-----------------------|---|
| 2.4.1                 | The health, vitality and other services provided by forest ecosystems are maintained or improved.   |
| Finding               | <p>One of the main goals mentioned in the Lithuanian Forest Policy and its implementation strategy is the protection of biodiversity and maintenance of forest vitality. Measures to achieve this goal are: reforestation and afforestation based on ecological and genetically sound base, planting more mixed forest and especially hardwood species, combining natural and artificial reforestation, formation of stable cost and river-based forest, increase of assortment grown in forest nurseries, selection of valuable forest populations in every forest natural region, protecting their natural and genetic composition and rationally using their genetic resources for reproduction, and reducing the use of chemicals and replacing them with mechanical and biological means etc. The analyses of forest vitality and health systems provided in the National Program on Development of Forest Sector 2012-2020 states that in Lithuania the monitoring of level I and II is constantly being carried out and that the general vitality of Lithuanian forest is considered good. In general, mean defoliation of all tree species has hardly varied from 1997 to 2012 and the condition of Lithuanian forest can be defined as relatively stable (<a href="#">Forest Condition in Europe Technical Report of ICP Forest 2013</a>). The common system of sanitation protection covers state and private forest and deals with occasionally occurring natural calamities and diseases or pest outbreaks. For instance: in 2002 the outbreak of <i>Lymantria monacha</i> L., in 2010 <i>Dendrolimus pini</i> L., during 1993-1995 <i>Ips typographus</i> L. Regulations on sanitation forest protection define the requirements and procedures for sanitation protection of state and private forest describing the necessary measures to prevent and eliminate reasons causing the damage to forest by biotic, abiotic and anthropogenic factors. In addition, state forest enterprises annually prepare and agree with the responsible institution (State Forest Service) an annual plan on improvement of forest sanitation conditions where various biological, chemical, physical, and mechanical protection measures are described. One of the main sanitation protection measures is the constant monitoring of forests, and in case of damage timely performed sanitation cuttings. The regulation of reforestation and planting defines the procedures and requirements for reforestation and afforestation, which according to the legislation targets planting more mixed forest stands based on forest site, environmental conditions and genetic resources. Regulations on forest reproductive material define the quality and origin requirements of forest reproductive material as well as defining procedures for growing, storage, preparation and quality checks of forest reproductive material. The data on forest genetic resources, the quality control of forest reproductive material, forest sanitation systems, as well as the list of forest seed base can be found on the website of the <a href="#">State Forest Service</a>. The regulations on forest cuttings set out the requirement for final forest cutting areas to retain a certain number and quality of biodiverse trees. Prevailing practice is to leave a group of biodiverse trees as the mini habitat. Responsible persons from state forest enterprises periodically check the cutting area before, during and after activities in order to be sure that operational activities do not cause the damage to forest ecosystems and vitality. The State Forest Service periodically controls how forest operations in the cutting areas are being or have been implemented according to the existing legal acts. The State Forest Service has an annual control plan where the aspect and places to be checked are listed (<a href="#">2014 annual control plan</a>). Private forest owners must follow the aforementioned legislation related to forest planting, sanitation protection and vitality. There are few scientific studies concerning the impact of forest operations on forest productivity and vitality. Those there are show that regardless of identified negative impact in certain cases, overall the damage to the forest vitality by forest operation is considered low.</p> |
| Means of Verification | <ul style="list-style-type: none"> <li>• Overall evaluation of potential impacts of operations on forest ecosystem health and vitality</li> <li>• Assessment of potential impacts at operational level and of measures to minimise impacts</li> <li>• Regional Best Management Practices</li> <li>• Supply contracts</li> <li>• Monitoring results</li> </ul>   |
| Evidence Reviewed     | <ul style="list-style-type: none"> <li>• <a href="#">Law on Forest</a> (1994-11-22, Nr. I-671)</li> <li>• <a href="#">National Program on Development of Forest Sector 2012-2020</a> (Decision of the Government, 2012-05-23, No. 569)</li> <li>• <a href="#">Lithuanian Forest Policy and its Implementation Strategy</a>, September, 2002 decree of the minister of environment No. 484</li> <li>• <a href="#">Regulations on Sanitation Forest Protection</a>, April 11, 2007, decree of the minister of Environment, No. D1-204</li> <li>• <a href="#">Rules on Private Forest Use and Management</a> (Decision of The Government, 1997-07-24, No. 799).</li> <li>• <a href="#">Regulations on forest cuttings</a> (Order of Minister of Environment, 2010-01-27, No. D1-79)</li> <li>• <a href="#">Regulation of Reforestation and Planting</a>, April 14, 2008 decree of the minister of Environment No. D1-19</li> <li>• <a href="#">Regulations on forest reproductive material</a>, 24 December, 2004, decree of the minister of Environment No. D1-681</li> </ul>   |
| Risk rating           | <input checked="" type="checkbox"/> <b>Low risk</b> <input type="checkbox"/> <b>Specified risk</b> <input type="checkbox"/> <b>Unspecified risk</b>   |

|                       | Indicator  |
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| 2.4.2                 | Natural processes, such as fires, pests and diseases are managed appropriately.  |
| Finding               | <p>The regulations on forest protection against fires define the general requirements for the establishment of anti-fire lines in forest as well as setting out the procedures for organising fire extinguishing systems in state and private forest. The state program on forest fire protection establishes and ensures the protection of all forest (state and private) against forest fires. Lithuanian forest, according to the burning class, is divided into three categories (low, medium and high). Forest management of state and private forest is based on the forest management plans where the procedures and measures to verify that natural processes, fires, pests and diseases are managed appropriately are defined. Forest management plans, as the main planning document, include the forest fire management plan, which comprises the fire protection line plan, the operational fire extinguishing plan, and maps of forest fire management. In Lithuania, the fire prevention and monitoring system covers all Lithuanian forest. The watch tower network covers the territory of Lithuania with digital cameras and corresponding software allowing detection and identification of forest fires and timely warnings to the responsible institutions. In addition, every state forest enterprise has an on the ground monitoring system and persons responsible for monitoring and reporting forest fires. The integrated warning system allowing reports about forest fire uses an integrated phone number. Every state forest enterprise periodically reports on forest fires, natural calamities, diseases and pests to the Directorate General of State Forests. The statistical information on forest fires can be found on the website of the Directorate General of State Forests (daily statistics on forest fires, forest distribution according to burning class etc.). Officers of the state forest enterprises daily monitor, especially during the fire season, and visit the operational sites in order to ensure that natural processes, fires, pests and diseases are managed appropriately. In addition, every forest worker and other personnel are instructed on fire prevention and protection measures and receive appropriate training. Machinery working in the forest must be technically sound and have the necessary fire extinguishers. In addition, the State Forest Service periodically controls how forest operations in cutting areas are being or have been implemented according to existing legal acts. The State Forest Service has an annual control plan where the aspect and places to be checked are listed (<a href="#">2014 annual control plan</a>). The regulations on forest sanitation protection define the procedures, responsible institutions and measures for forest protection against pests, diseases and other natural calamities. The monitoring data about forest sanitation conditions and damages have been available since 1968. Every state forest enterprise must report regularly on the forest condition, natural calamities, diseases and pests to the Directorate General of State Forests and the State Forest Service. Statistical data on forest sanitation conditions, measures for forest sanitation protection, lists of related legal acts, diseases and pests, as well as various scientific reports are available on the website of the <a href="#">State Forest Service</a>. In addition, every forest management plan, which functions as the main planning document includes the measures for forest protection against pests, diseases, natural calamities etc. Preventative measures to be used by forest owners are as follows: monitoring and regular check up and forecast of possible diseases and pests, the establishment of the damage layer for diseases and pests according to the environmental impact assessment, operational, mechanical and chemical measures, analyses of the effectiveness of preventative measures, biological and chemical products, sanitation cuttings, and trees for insect trapa, quarantine etc. Monitoring is carried out by the responsible persons of the state forest enterprises and the State Forest Service. Every year the State Forest Service monitors, analyses and reports on the situation concerning the concentration of diseases and according to the forecast will suggest whether to increase or implement additional measures to protect the forest.</p> |
| Means of Verification | <ul style="list-style-type: none"> <li>• Regional Best Management Practices</li> <li>• Supply contracts</li> <li>• Assessment of potential impacts at operational level and of measures to minimise impacts</li> <li>• Monitoring results</li> </ul>   |
| Evidence Reviewed     | <ul style="list-style-type: none"> <li>• <a href="#">General Regulations on Protection against Fire</a> July 27, 2010 No. 1-223</li> <li>• <a href="#">State Program of Forest Fire Protection</a>, 4 March, 2002, decree of the minister of Environment No. 91</li> <li>• <a href="#">Regulations of Forests Protection against Fires</a>, April 7, 1995, Decision of the Government No. 500</li> <li>• <a href="#">Regulations on Forest Sanitation Protection</a>, April 11, 2007, decree of the minister of environment Nr. D1-204</li> </ul>  |
| Risk Rating           | <input checked="" type="checkbox"/> <b>Low risk</b> <input type="checkbox"/> <b>Specified risk</b> <input type="checkbox"/> <b>Unspecified risk</b>  |

|                       | Indicator   |
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| 2.4.3                 | There is adequate protection of the forest from unauthorised activities, such as illegal logging, mining and encroachment.  |
| Finding               | <p>The State Forest Service periodically controls how forest operations in cutting areas are being or have been implemented according to the existing legal acts. The State Forest Service has an annual control plan where the aspect and places to be checked are listed (<a href="#">2014 annual control plan</a>). Even though the legal authorities have increased the control of illegal logging in Lithuania, some illegal logging still occurs. The extent of illegal logging has been more or less stable during the past four years (2008-2012), but has decreased by 64% compared to 2002. In 2011, 527 cases were detected in state and private forest, where 8,500 m<sup>3</sup> were illegally logged. The majority (71%) of illegally felled wood, amounting to 6,000 m<sup>3</sup>, was felled in private forest. In 2011, there were 46 cases where round wood product was stolen from state forest (total 700 m<sup>3</sup>). According to statistical data provided by the State Forest Service, illegally logged wood in Lithuania amounts to only 0.1% of the total felled timber volume. The latest available data for 2013 shows a decreasing trend in illegal logging cases and in volume. Over the last three years no official cases concerning bribery among persons responsible for issuing logging licences has been reported. The transparency international corruption perception index for Lithuania was 57 in 2013, therefore corruption is not considered a key factor influencing illegal activities in the forest. According to the latest information of the Royal Institute of International Affairs, illegal logging is not a serious problem in Lithuania; in 2003, an estimated 0.7% of domestic timber production was illegal (<a href="#">UNECE/FAO 2004</a>). All state forest enterprises in Lithuania facing the obligations of the EU Timber Regulation decided to evaluate and strengthen their due diligence systems for the production of legal timber. Statistical information, as well as maps of registered private forest management plans and cutting permissions issued in private forest, can be obtained online: <a href="http://www.amvmt.lt:81/mgis/">http://www.amvmt.lt:81/mgis/</a>. Based on the decree of the Directorate General of State Forests, every state forest enterprise established a group of inspectors comprising different control institutions (state forest enterprise, regional department of Environmental Protection Agency, and the police) and it periodically monitors unauthorised activities in the forest and reports to the Directorate General of State Forests. Information on statistics and monitoring results of controls can be found on the websites of the responsible institutions; the Directorate General of State Forests, the State Forest Service, and the Environmental Protection Agency and its regional offices. One of the measures to discourage illegal logging, encroachment and other unauthorised activities are penalties, which during the last years have been increased substantially.</p> |
| Means of Verification | <ul style="list-style-type: none"> <li>• Maps</li> <li>• Records of BP's field inspections</li> <li>• Monitoring records</li> <li>• Interviews with staff</li> <li>• Publicly available information</li> <li>• Request to Environmental Inspectorate</li> <li>• Interview with Environmental Inspectorate</li> </ul>  |
| Evidence Reviewed     | <ul style="list-style-type: none"> <li>• <a href="#">Regulations on private forests management and use</a> (Decision of the Government, 1997-07-24, No. 799)</li> <li>• <a href="#">Regulations on forest cuttings</a> (Order of Minister of Environment, 2010-01-27, No. D1-79)</li> <li>• <a href="#">National Program on Development of Forest Sector 2012-2020</a> (Decision of the Government, 2012-05-23, No. 569)</li> <li>• <a href="#">Schedule of procedures to issue the forest cutting permissions</a> (Order of Minister of Environment, 2010-12-30, No. D1-1055)</li> <li>• <a href="#">Regulations on marking and evaluation of forest cutting area</a> (Order of Minister of Environment, 2004-11-10, No. D1-577)</li> <li>• <a href="#">Schedule of procedures on forest cuttings in private forests estates without forest management plan</a> (Order of Minister of Environment, 2004-11-08, No. D1-569)</li> <li>• <a href="#">Schedule of procedures on forest cutting in forests reserved for privatization</a> (Order of Minister of Environment, 2002-04-30, No. 219)</li> <li>• <a href="#">Regulations on forest cuttings for technological and commercial purposes in forest sector</a> (Order of Minister of Environment, 2002-04-03, No. 145)</li> <li>• Rules on forest logging for technological and management purposes (Order of Minister of Environment 2002-04-03, No. 145)</li> <li>• Procedure for logging timber, which is needed for private household building, maintenance or reconstruction, in private forests (Order of Minister of Environment 2002-03-18, No. 118)</li> <li>• Rules on logging forests that are reserved for private ownership restitution (Order of Minister of Environment 2002-04-30, No. 219)</li> </ul>  |
| Risk Rating           | <input checked="" type="checkbox"/> <b>Low risk</b> <input type="checkbox"/> <b>Specified risk</b> <input type="checkbox"/> <b>Unspecified risk</b>   |



|                       | Indicator   |
|-----------------------|---|
| 2.5.1                 | The legal, customary and traditional tenure and use rights of indigenous peoples and local communities related to the forest, are identified, documented and respected.   |
| Finding               | <p>A brief evaluation of various reports was undertaken in order to confirm low risk for the protection of traditional people's rights. All reports state that Lithuania has sufficient legislation for traditional rights protection. Education, medical care, employment and other social programs are implemented. There are no recognised acts on violations of rights, customs and culture and there is no evidence of violations of traditional and/or customary rights, including use rights, cultural interest or traditional cultural identity. The council of traditional communities (NGO) is in charge of the traditional communities people affairs. The NGO community is working very actively in Lithuania in the field of introducing traditional communities with applicable rights, laws and regulations and to ensure its enforcement. The current situation of traditional communities is briefly described in the NGO's yearly publications. In Lithuania, representatives from national minorities (traditional communities) and Lithuanians have the same land use rules and rights. Lithuania has not ratified the ILO convention 169. The main laws and regulations that govern identification of national minorities (traditional communities) are as follows: the Constitution of the Republic of Lithuania; and the Convention for protection National Minorities, which came into force in 2000. Customary rights to non-timber forest products in state strict nature reserve areas are defined by special regulations allowing local communities to collect berries and mushrooms as well as undertake fishing activities when following special provisions. Logging activities in strict nature reserves are prohibited by law.</p> |
| Means of Verification | <ul style="list-style-type: none"> <li>• Customary and traditional tenure and use rights are identified and documented</li> <li>• Interviews with local communities and other stakeholders, indicate that their rights are respected</li> <li>• Appropriate mechanisms to resolve disputes exist</li> <li>• Agreements exist regarding these rights</li> </ul>  |
| Evidence Reviewed     | <ul style="list-style-type: none"> <li>• <a href="#">Constitution of the Republic of Lithuania, 1992 10 25 (Art. 37 and 45)</a></li> <li>• <a href="#">Convention 157 for the Protection of National Minorities (1995)</a></li> <li>• Acting organisations in charge of traditional community's people affairs</li> <li>• <a href="#">The Ministry of Culture of the Republic of Lithuania</a></li> <li>• <a href="#">The house of national communities</a></li> <li>• Open Society Fund - Lithuania. Report about Monitoring the EU Accession Process: Minority Protection</li> <li>• <a href="http://politika.osf.lt/eurointegration/index.htm">http://politika.osf.lt/eurointegration/index.htm</a></li> <li>• <a href="#">Publications and news about traditional communities, issued by the Council of traditional communities</a></li> <li>• <a href="#">Law on Forest (1994-11-22, Nr. I-671)</a></li> <li>• <a href="#">Rules for visiting Cepkeliai Strict Nature Reserve</a></li> <li>• <a href="#">Rules for fishing in Zuvintas biosphere Strict Nature Reserve</a></li> </ul>  |
| Risk Rating           | <input checked="" type="checkbox"/> <b>Low risk</b> <input type="checkbox"/> <b>Specified risk</b> <input type="checkbox"/> <b>Unspecified risk</b>   |

|                       | Indicator   |
|-----------------------|---|
| 2.5.2                 | Production of feedstock does not endanger food, water supply or subsistence means of communities, where the use of this specific feedstock or water is essential for the fulfilment of basic needs.   |
| Finding               | The main necessities of local communities are related to recreation and mushroom and berry picking. These activities are important for many people for leisure or perquisite income. The right to get free access to forest is guaranteed in the Constitution of Republic of Lithuania, Forests Law and other legal acts. With a few exceptions all forest is available for berry and mushroom picking. Exceptions include only the nature reserves and berry plantations in the forest. Forest management does not play a significant role in relation to the community necessities, because the Lithuanian forest cover is more than 30% and various succession stage forest is available across the landscape. There is therefore low risk related to this indicator. Prevailing practice is that state forest enterprises allow local people to collect the cutting residues from cutting areas. In addition, local people can buy fuel wood without any restrictions. The market analyses indicate that there is no lack of fuel wood for local people and that forest operation does not cause or influence the lack of basic needs for local people. |
| Means of Verification | <ul style="list-style-type: none"> <li>Interviews with local communities and other stakeholders indicate that subsistence needs are not endangered; agreements exists on resource rights where these impact the needs of communities</li> </ul>   |
| Evidence Reviewed     | <ul style="list-style-type: none"> <li><a href="#">Constitution of the Republic of Lithuania</a> (1992-10-25)</li> <li><a href="#">Law on Forest</a> (1994-11-22, Nr. I-671)</li> <li>The Rules of forest visiting (1996-12-05 No. 176/240, Order of Lithuanian Minister of Environment)</li> <li><a href="#">Rules for visiting Cepkeliai Strict Nature Reserve</a></li> <li><a href="#">Rules for fishing in Zuvintas biosphere Strict Nature Reserve</a></li> </ul>  |
| Risk Rating           | <input checked="" type="checkbox"/> <b>Low risk</b> <input type="checkbox"/> <b>Specified risk</b> <input type="checkbox"/> <b>Unspecified risk</b>   |

|                       | Indicator   |
|-----------------------|---|
| 2.6.1                 | Appropriate mechanisms are in place for resolving grievances and disputes, including those relating to tenure and use rights, to forest management practices and to work conditions.  |
| Finding               | <p>Grievances and disputes, including those relating to tenure and use rights, related to forest management practices and to work conditions are regulated by basic legislation, namely: the Constitution, the Lithuanian Civil Code, the Labour Code, the Code of Administrative Violations etc. The detailed procedures, duties and responsibilities of involved persons are defined in the basic legislation. In Lithuania, the land restitution process is ongoing, therefore most cases of grievances and disputes are related to the establishment of tenure and use rights over forest under restitution processes, and disputes over forest borders. There are procedures which must be followed during the restitution process when the independent land measurement organisation is hired to define and set the border between the private forest owner and the user. During the measurement process, the forest owner participates and signs the report of measurement. In the report, the owner records any disagreements or comments, or not sign the report. In which case the dispute is solved together with the independent measurement organisation. If no resolution can be reached it is possible to apply to a higher controlling institution (for instance, the Land management division under the National Land Service). In addition, state forest enterprises have their own procedures which regulate the registration, investigation and the application of relevant actions in order to solve disputes with private persons and local communities. In cases where disputes arise among private persons, they must follow the basic procedures defined in Lithuanian legislation. The disputes related to work conditions must be solved according to the administrative procedures and labour legislation. Prevailing practice is to include additional clarification statements in the working agreements concerning dispute resolution. In addition, the trade unions can assist in solving disputes over working conditions and can use their own procedures and agreements.</p> |
| Means of Verification | <ul style="list-style-type: none"> <li>• Existing legislation</li> <li>• Level of enforcement</li> <li>• Regional Best Management Practices</li> <li>• Supply contracts</li> <li>• Records of biomass producer's field inspections</li> <li>• Monitoring records</li> </ul>   |
| Evidence Reviewed     | <ul style="list-style-type: none"> <li>• <a href="#">Constitution on the Republic of Lithuania, 1992 10 25</a></li> <li>• <a href="#">Lithuanian Civil Code (2000-07-18, No. VIII-1864)</a></li> <li>• <a href="#">Law on the Real Property Register (1996-09-24, No. I-1539)</a></li> <li>• <a href="#">Law on Land (26 April 1994 No. I-446)</a></li> <li>• <a href="#">Law on Land Reform (25 July 1991, No. I-1607)</a></li> <li>• <a href="#">Law on restoration of citizens rights to extant real property (1997-07-01, No. VIII-359)</a></li> <li>• <a href="#">Restoration of ownership rights to forest land (Decision of the Government, 1992-08-25, No. 635)</a></li> <li>• <a href="#">State forest management handover to State Forest Enterprises (Decision of the Government, 2006-05-17, No. 454)</a></li> <li>• <a href="#">Law on Collective agreements, No I-1201, 1991 04 04</a></li> <li>• <a href="#">Labour Code, part II, no IX-926, 2002 06 04</a></li> <li>• <a href="#">Labour Code, part III, no IX-926, 2002 06 04</a></li> <li>• <a href="#">Code of Administrative Violations</a></li> </ul>   |
| Risk Rating           | <input checked="" type="checkbox"/> <b>Low risk</b> <input type="checkbox"/> <b>Specified risk</b> <input type="checkbox"/> <b>Unspecified risk</b>   |

|                       | Indicator  |
|-----------------------|--|
| 2.7.1                 | Freedom of Association and the effective recognition of the right to collective bargaining are respected.  |
| Finding               | <p>The Social report of the Ministry of Social Security and Labour describes accomplished tasks in the social assistance system. System reorganisation, which is a project related to the “Social Assistance Service” was launched in 2012 with the aim of establishing a greater extent of social justice in the country. More detailed information about the social situation in the country is to be found in the social report of The Ministry of Social Security and Labour 2011-2012, Vilnius 2012. The Lithuanian Trade Union Confederation (LPSK) is an independent organisation made up of Government and managing authorities, employers and their organisations, and also public organisations and movements. LPSK is a member of the International Trade Union Confederation (ITUC), and the European Trade Union Confederation (ETUC), and cooperates with the International Labour Organisation (ILO). The Lithuanian system of collective bargaining comprises legally enforceable collective agreements that are, according to the Labour Code, one of the sources of the Labour law. Article no. 50 of the Lithuanian Constitution (1992) establishes the right to form and join trade unions and the workers right to strike for protecting their economic and social interests. According to the Labour Code, article no. 22, the trade union has the right to exercise non-governmental supervision and control of compliance with labour laws. According to the Law on Trade Unions, article no. 17, trade unions have the right to supervise the employer’s adherence to and implementation of the labour, economic and social laws related to the rights and interests of their members, as well as to the collective and other agreements. Article no. 18 states the right of trade unions to demand the annulment of the employer’s decisions which violate the labour, economic and social rights of their members provided by the laws of the Republic of Lithuania. Article no. 19 gives the right of trade unions to propose that legal action be taken against officials who violate laws on labour, or who do not ensure safety at work, or who do not execute the collective or other mutual agreements. The latest trade union confederation report shows positive trends in the Lithuanian labour sector. There were no major law violations identified in order to uphold the right of freedom of association and collective bargaining. Most of the state forest enterprises have established trade unions, which means that they have an agreement with the employee and they periodically review the agreement at which time the work conditions and other related issues are discussed and defined. Many foresters belong to the Foresters Union, which also deals with rights, work conditions and other questions relevant to foresters working in the forest sector. Lithuania has signed and ratified the ILO Declaration on Fundamental Principles and Rights at Work including ILO Conventions 98, 87 and 135, which came into force 26 September 1994.</p> |
| Means of Verification | <ul style="list-style-type: none"> <li>• Existing legislation</li> <li>• Level of enforcement</li> <li>• Supply contracts</li> <li>• Records of biomass producer’s field inspections</li> <li>• Assessment at an operational level of measures designed to minimise impacts on the values identified</li> <li>• Monitoring records</li> </ul>  |
| Evidence Reviewed     | <ul style="list-style-type: none"> <li>• Lithuanian Trade Union Confederation (LPSK) <a href="http://www.lpsk.lt">http://www.lpsk.lt</a></li> <li>• The main legal acts covering the freedom of association and collective bargaining are as follows:</li> <li>• <a href="#">Law on Collective agreements, No I-1201, 1991 04 04</a></li> <li>• <a href="#">Labour Code, part II, no IX-926, 2002 06 04</a></li> <li>• <a href="#">Labour Code, part III, no IX-926, 2002 06 04</a></li> <li>• <a href="#">Law on Trade Unions, no I-2018, 1991 11 21</a></li> <li>• <a href="#">Constitution on the Republic of Lithuania, 1992 10 25</a></li> <li>• ILO Convention site: <a href="http://www.ilo.org/">http://www.ilo.org/</a></li> </ul>  |
| Risk Rating           | <input checked="" type="checkbox"/> <b>Low risk</b> <input type="checkbox"/> <b>Specified risk</b> <input type="checkbox"/> <b>Unspecified risk</b>  |

|                       | Indicator   |
|-----------------------|---|
| 2.7.2                 | Feedstock is not supplied using any form of compulsory labour.  |
| Finding               | According to the Lithuanian Constitution (1992) Article no. 48, forced labour is prohibited. In 1994, Lithuania ratified the ILO Convention concerning forced or compulsory labour no. I-507, which came into force in 1995. The Ministry of Social Security and Labour is responsible for implementing the convention and taking all measures to avoid forced or compulsory labour in the country. The situation of compulsory and/or forced labour in Lithuania was explored through the analysis of non-governmental research, but no major evidence of the existence of compulsory labour was identified. |
| Means of Verification | <ul style="list-style-type: none"> <li>Existing legislation</li> <li>Level of enforcement</li> <li>Supply contracts</li> <li>Records of biomass producer's field inspections</li> <li>Monitoring records</li> </ul>   |
| Evidence Reviewed     | <ul style="list-style-type: none"> <li><a href="#">Lithuanian Trade Union Confederation report (2006-2010)</a></li> <li><a href="#">Constitution on the Republic of Lithuania, 1992 10 25</a></li> <li>ILO Convention concerning Forced or Compulsory Labour, No I-507, ratified 1994 06 23</li> </ul>  |
| Risk rating           | <input checked="" type="checkbox"/> <b>Low risk</b> <input type="checkbox"/> <b>Specified risk</b> <input type="checkbox"/> <b>Unspecified risk</b>   |

|                       | Indicator  |
|-----------------------|--|
| 2.7.3                 | Feedstock is not supplied using child labour.  |
| Finding               | <p>The existing information on child labour in the reports of relevant institutions was reviewed. The latest report from the Ministry of Social Security states that the State Labour Inspectorate prepares methods and recommendations concerning illegal work practices, organises seminars, establishes the procedure of cooperation between officials of supervisory authorities and institutions in organising joint checks, analyses results of control and furnishes conclusions to all authorities and institutions exercising control over illegal work, organises educational activities aimed at the development of intolerance toward illegal work practices and encouraging the public to participate in identifying such practices, and implements other measures. There was no evidence of child labour identified after analysing the reports. The Ministry of Social Security and Labour is responsible for managing the protection of children’s rights. Child labour is regulated by the Code of Labour Laws, the Law on Fundamentals of Protection of the Rights of the Child, and other laws or state regulations. Children of 14 years and above must have the right to work commensurate with his/her age, state of health, general education level and professional expertise. The work must be chosen freely. In 1992, Lithuania ratified the UN Convention on the Rights of the Child. The Ministry of Social Security and Labour is responsible for implementing the convention and taking all measures to protect the rights of children. Lithuania has been a member state of the ILO since 1991. The country has ratified <a href="#">40 ILO International Labour Standards (Conventions)</a>, including the eight fundamental Conventions. Lithuanian legislation covers all aspects of equal rights. In 1995, Lithuania ratified the Convention for the Protection on Human Rights and Fundamental Freedom (1950) no. 005.</p> |
| Means of Verification | <ul style="list-style-type: none"> <li>• Existing legislation</li> <li>• Level of enforcement</li> <li>• Supply contracts</li> <li>• Records of biomass producer’s field inspections</li> <li>• Assessment at an operational level of measures designed to minimise impacts on the values identified</li> <li>• Monitoring records</li> <li>• Public Information</li> </ul>  |
| Evidence Reviewed     | <ul style="list-style-type: none"> <li>• Labour Code, no IX-926, 2002 06 04</li> <li>• Law on fundamentals of Protection the rights of the child, No I-1234, 1996 03 14</li> <li>• Law on benefits for children, No XI-1756, 2011 12 01</li> <li>• <a href="#">UN Convention on the Rights of the Child, ratified 1995 07 03</a></li> <li>• <a href="#">The Ministry of Social Security reports on implementation of the United Nations Convention on the rights of the child in Lithuania</a></li> </ul>  |
| Risk Rating           | <input checked="" type="checkbox"/> <b>Low risk</b> <input type="checkbox"/> <b>Specified risk</b> <input type="checkbox"/> <b>Unspecified risk</b>  |

|                       | Indicator   |
|-----------------------|---|
| 2.7.4                 | Feedstock is not supplied using labour which is discriminated against in respect of employment and occupation.  |
| Finding               | <p>Reports of independent sources, such as the Special Euro barometer 393, the European Commission and the Ministry of Social Security and Labour make recommendations for improvement to the Lithuanian authorities, however, there is no major evidence of discrimination in the country in respect of employment, and/or occupation, and/or gender. The Office of Equal Opportunities Ombudsperson is an independent state institution appointed by and accountable to the Parliament. The Ombudsperson investigates individual complaints on the grounds of gender, age, racial or ethnic origin, religious beliefs, disability, sexual orientation, language, and social status, and submits recommendations and proposals to the Parliament and the governmental institutions on the priorities of gender equality policy, including recommendations on amendments to relevant legislation. The Lithuanian legislation covers all aspects of equal opportunities. A person may not have his/her rights restricted in any way or be granted any privileges on the basis of his or her sex, race, nationality, language, origin, social status, religion, convictions or opinions. Lithuania has been a member state of the ILO since 1991. The country has ratified <a href="#">40 ILO International Labour Standards (Conventions)</a>, including the eight fundamental Conventions. Lithuanian legislation covers all aspects of equal rights. In 1995, Lithuania ratified the Convention for the Protection on Human Rights and Fundamental Freedom (1950) no. 005. The Ministry of Social Security and Labour is responsible for implementing the convention and taking all measures to assure equal rights in any groups related to the above. Reports of independent parties were reviewed in order to discover if any evidence of any groups (including women) not feeling adequately protected in terms of rights, also evidence of discrimination against women and/or gender inequity. Report evaluation showed positive trends. The mechanism for implementation of the Program for the Advancement of Woman has been created and continuously developed, supporting women's issues on all levels. The number of women in the governmental sector has increased. There is a strongly increasing number of woman's organisations. The attitudes of the authorities and understanding of gender-related and equality matters are gradually changing in society. All analyses above were done with a focus on the forestry sector. No evidence was found of violations in the specific sector.</p> |
| Means of Verification | <ul style="list-style-type: none"> <li>• Existing legislation</li> <li>• Level of enforcement</li> <li>• Supply contracts</li> <li>• Records of biomass producer's field inspections</li> <li>• Monitoring records</li> <li>• Company policies indicate that the requirements are met</li> </ul>  |
| Evidence Reviewed     | <ul style="list-style-type: none"> <li>• Equal Opportunities Ombudsperson's office: <a href="http://www.lygybe.lt">www.lygybe.lt</a></li> <li>• Lithuanian Center of Equality Advancement (CEA): <a href="http://www.gap.lt">www.gap.lt</a></li> <li>• Law on Equal Opportunities, No VIII-947, 1998 12 01</li> <li>• Law on Equal Opportunities of Women and Men (1999)</li> <li>• <a href="#">European Commission against Racism and Intolerance report on Lithuania, 2011 09 13</a></li> <li>• <a href="#">European Commission Euro barometer Discrimination in the EU, 2012. Results of Lithuania</a></li> <li>• Report of The Ministry of Social Security and Labour 2009 about equal opportunities for man and woman program implementation</li> <li>• <a href="http://www.socmin.lt/index.php?-681837845">http://www.socmin.lt/index.php?-681837845</a></li> <li>• <a href="#">Lithuanian Trade Union Confederation report (2006-2010)</a></li> <li>• <a href="#">Constitution on the Republic of Lithuania, 1992 10 25</a></li> <li>• ILO Convention concerning Forced or Compulsory Labour, No I-507, ratified 1994 06 23</li> <li>• ILO Convention site: <a href="http://www.ilo.org/">http://www.ilo.org/</a></li> <li>• Convention for the Protection on Human Rights and Fundamental Freedoms (1950) no 005</li> <li>• <a href="http://www.manoteises.lt/downloads/brosiura.pdf">http://www.manoteises.lt/downloads/brosiura.pdf</a></li> <li>• <a href="#">Prohibiting discrimination, integration. Norms, stereotypes, prejudices, possibilities</a>, Book issued by The Office of Equal Opportunities Ombudsperson, 2007</li> <li>• <a href="#">The Ministry of Social Security reports on implementation the program of equal rights</a></li> <li>• The Ministry of Social Security report on the elimination of all forms of discrimination against women <a href="http://www.socmin.lt/index.php?-681837845">http://www.socmin.lt/index.php?-681837845</a></li> </ul>  |
| Risk rating           | <input checked="" type="checkbox"/> <b>Low risk</b> <input type="checkbox"/> <b>Specified risk</b> <input type="checkbox"/> <b>Unspecified risk</b>   |

|                       | Indicator   |
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| 2.7.5                 | Feedstock is supplied using labour where the pay and employment conditions are fair and meet, or exceed, minimum requirements.  |
| Finding               | <p>Legal employment in Lithuania is defined by a number of different pieces of legislation. According to the legislation, all employees must have signed an employment contract, which is the basis for the obligatory social security ensured by paying taxes to the social security company, SoDra. According to the requirements of the Labour Law, the employment contract must be in writing and it must contain essential provisions in order to be valid, such as conditions of payment, the place of work and a job description. Certain types of employment contracts may require additional provisions, such as the term of the contract, seasonal work etc. Temporary hires, provided through employment agencies, offer an alternative to fixed term contracts. Temporary employment is rapidly growing in Lithuania as a flexible solution for part-time, project or fixed term employment, and is used as a risk management strategy at the start-up stage. Temporary employment is regulated by the Law on Temporary Agency Employment, which was adopted to implement the EU Directive on temporary agency work. Illegal employment in Lithuania is controlled and preventative measures implemented by different institutions such as the State Labour Inspectorate, the State Social Security Fund Council, the State Tax Inspectorate, the Financial Crime Investigation Service and the Police Department. Based on a report provided by the State Labour Inspectorate the most common cases of illegal employment in Lithuania for all economic sectors are: 1. working without an employment contract; 2. individual persons performing economic activities without self-employed licences; and 3. performing economic activities without legally registering the company or without the required licences or through other illegal activities. In 2011, the State Labour Inspectorate set up standing groups to control and prevent illegal, undeclared work in Lithuania's five largest cities. The groups consist of VDI inspectors (lawyers) who are provided with appropriate resources. Any necessary assistance can be sought from representatives of other institutions. The results show that this initiative has contributed to better detection of undeclared work compared to previous years. The State Labour Inspectorate conducted more than 3,700 checks of possible illegal employment and identified 1,700 illegally employed people in 2012. The most illegal (illicit) labour cases in 2012 were in the following sectors: construction, 35.85%, other public services, 12.46%, wholesale/retail trade, 10.53%, and agriculture, 7.84%. It should be noted that, compared with 2011, the number of persons employed illegally in forestry sector in 2012 reduced from 6.86% to 4.44% in 2012. The State Labour Inspectorate prepared an action plan for 2013, which highlighted the need to strengthen enforcement of illegal employment control and preventative measures in order to achieve better results compared to 2012. Recently the cooperation agreement was signed between the Lithuanian Private Owners Association and the State Labour Inspectorate with a concrete action plan to reduce health and safety violations as well as Illegal work. Based on the information provided above even though there might be some cases of illegal employment in the forestry sector, the control and preventative measures implemented by the legal authorities, as well as positive trends towards reduced illegal employment rates in the forestry sector provide a solid background for defining this sub-category as low risk.</p> <p>The minimum wage is defined by the Government; the last increase of the minimum wage was approved by the Government in 2012. In the decree the minimum wage for a month was set at 1,000 Lt and the minimum wage for an hour at 6.06 Lt.</p> |
| Means of Verification | <ul style="list-style-type: none"> <li>• Existing legislation</li> <li>• Level of enforcement</li> <li>• Supply contracts</li> <li>• Records of biomass producer's field inspections</li> <li>• Monitoring records</li> </ul>   |
| Evidence Reviewed     | <ul style="list-style-type: none"> <li>• <a href="#">Labour Code of the Republic of Lithuania (2002.06.04, IX-926)</a></li> <li>• <a href="#">Civil Code of the Republic of Lithuania (2000.07.18 d, No. VIII-1864)</a></li> <li>• <a href="#">Law on Social Security (1991.05.21d, No. I-1336)</a></li> <li>• <a href="#">Government decision on seasonal work (1994.03.07, No. 154)</a></li> <li>• <a href="#">Government decision on employment of persons under 18 year old (2003.01.29, No. 138)</a></li> <li>• <a href="#">Order on forest work safety (1996.11.25, 208)</a></li> <li>• <a href="#">Law on Temporary Agency Employment (2011.05.19, XI-1379)</a></li> <li>• <a href="#">Report from State Labour Inspectorate, 2012</a></li> <li>• <a href="#">Action plan for State Labour Inspectorate, 2013</a></li> <li>• <a href="#">Eurofund report on Tackling undeclared work in the European Union</a></li> <li>• <a href="#">Decree of the Government on increase of minimum wage, December 19, 2012 No. 1543</a></li> </ul>  |
| Risk Rating           | <input checked="" type="checkbox"/> <b>Low risk</b> <input type="checkbox"/> <b>Specified risk</b> <input type="checkbox"/> <b>Unspecified risk</b>   |



|                       | Indicator  |
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| 2.8.1                 | Appropriate safeguards are put in place to protect the health and safety of forest workers.  |
| Finding               | <p>Health and safety in forestry activities is monitored by the State Labour Inspectorate. It fulfils not only control and monitoring functions, but also provides guidance on health and safety issues in different business sectors. The forestry sector in Lithuania is considered to be amongst the most dangerous activities, and accordingly special control by the State Labour Inspectorate is applied. At least annually the Inspectorate makes preventative monitoring of logging activities in various parts of the Lithuanian forest to control possible illegal employment as well as violations of health and safety requirements. Furthermore, the Inspectorate collects data on the various accidents at work and provides summary statistics by different business sectors. Based on an analysis of various reports provided by the State Labour Inspectorate it is evident that the forestry sector still has a high rate of work-related accidents. The forestry sector is number 4 amongst the most dangerous sectors (1. construction, 2. transport and security services, 3. water supply and sewage treatment, 4. forestry, 5. electricity, gas and steam supply), in terms of fatal and serious injuries. During 2012, there were four deaths and four serious injury accidents in the forestry sector. Despite work-related accidents still occurring, the rate of serious injuries per 100,000 workers in 2012 in Lithuania decreased by 29% and fatalities by 39%. In order to prevent accidents at work, the State Labour Inspectorate prepared a Health and Safety strategy for 2009-2012, which is approved by the Government. Based on the strategy various risk mitigation measures are foreseen and implemented by various institutions. The abovementioned decrease in accidents at work is considered to be a consequence of the implemented health and safety strategy. Every year state forest enterprises must analyse the training and qualification demand, and prepare the annual training plan for its specialists and workers. The plan must take into account the employees needs as well as the necessary qualification requirements for their duties and responsibilities. In addition, according to the health and safety legislation, every new employee must be inducted in the safety procedures/instructions and update his/her skills on safety and health requirements annually by attending special courses or receiving instructions. Such action must be proved by corresponding documents and training records. Many forest activities in the state and private forest are performed by contractors who are obliged to hold the necessary qualifications and documents of proof. When state forest enterprises organise the tender they must ask contractors for the documents proving their qualifications as well as other skills needed for the job. The order on forest work safety requires that every forest worker must have the necessary qualifications and the documents to prove it. Logging companies that are working in FSC FM/CoC certified forest operations (e.g. state forest enterprises) based on subcontracting agreements are monitored not only by the forest managers, that are required to fulfil the FSC requirements set in P4 (P2 in FS-STD-o1-oo1 v 5-0), but also by the accredited FSC certification bodies that carry out field observations of such companies during certification audits. All state forest enterprises in Lithuania facing the obligations of the EU Timber Regulation decided to evaluate and strengthen their due diligence systems for the production of legal timber. A risk assessment of the due diligence systems in all of the state forest enterprises was prepared and as a result the area of health and safety area was identified as having the highest risk. Therefore corresponding measures have been prepared, namely: to monitor periodically all contractors and subcontractors working in state forest and to check if they are following health and safety requirements (equipment, qualification documents, work place, knowledge of health and safety requirements etc.). Every state forest enterprise and all companies according to the health and safety legislation must conduct the risk assessment of the work place and based on the result must give the appropriate personal protective equipment.</p> <p>Within the EU forest sector, Lithuania is the country with the highest risk in relation to health and safety. There is a concern about contractors working in private forest because of periodically occurring fatal and serious injuries at the work place. In addition, there are not sufficient measures to ensure that contractors working in private forest follow the health and safety requirements, therefore it was decided to assign specified risk to this indicator for the contractors working in private forest.</p> |
| Means of Verification | <ul style="list-style-type: none"> <li>• Existing legislation</li> <li>• Level of enforcement</li> <li>• Supply contracts</li> <li>• Records of biomass producer's field inspections</li> <li>• Monitoring records</li> <li>• Feedback from Labour Inspectorate</li> </ul>   |

|                          |   |
|--------------------------|---|
| <p>Evidence Reviewed</p> | <ul style="list-style-type: none"> <li>• <a href="#">Labour Code of the Republic of Lithuania</a> (2002.06.04, IX-926)</li> <li>• <a href="#">Law on Safety and Health at Work</a> (2003.07.01, IX-1672)</li> <li>• <a href="#">Law on the State Labour Inspectorate of the Republic of Lithuania</a> (2003.10.14, IX-1768)</li> <li>• <a href="#">List of dangerous activities</a> (Government decision, 2002.09.03, 1386)</li> <li>• <a href="#">Order on providing personal health and safety equipment for workers</a> (Minister of Social Security and Labour, 2007.11.26, A1-331)</li> <li>• <a href="#">Government decision concerning special conditions for land and forest use</a> (Government decision 1992.05.12, 343)</li> <li>• <a href="#">Order on hearing protection at work and measures to control</a> (Chief State Labour Inspector, 2006.03.30, 1-66)</li> <li>• <a href="#">Adaptation of agricultural machinery for forest work</a> (Agriculture Minister, 2004.12.29, 3D-685)</li> <li>• <a href="#">Order on hygiene requirements for heating in working premises</a> (Minister of Health, 2003.12.24, V-770)</li> <li>• <a href="#">Order on hygiene requirements for pesticide active ingredient concentration in surrounding environment</a> (Minister of Health, 2004.06.03, V-412)</li> <li>• <a href="#">Order on forest work safety</a> (1996.11.25, 208)</li> <li>• <a href="#">Health and Safety strategy for 2009-2012</a> (Government decision 2009-06-25, No. 669).</li> <li>• <a href="#">Report from State Labour Inspectorate, 2012 (I)</a></li> <li>• <a href="#">Report from State Labour Inspectorate, 2012 (II)</a></li> <li>• <a href="#">Report from State Labour Inspectorate, 2013</a></li> </ul> |
| <p>Risk rating</p>       | <p> <input type="checkbox"/> Low risk                                      <input checked="" type="checkbox"/> Specified risk                                      <input type="checkbox"/> Unspecified risk             </p>   |

|                       | Indicator   |
|-----------------------|---|
| 2.9.1                 | Feedstock is not sourced from areas that had high carbon stocks in January 2008 and no longer have those high carbon stocks.  |
| Finding               | <p>Areas of high carbon stock are considered to be in wetlands, peat lands and old mature forests stands. The Law on Forests states that for management purposes Lithuanian forests are divided into four groups (forest reserves, special-purpose forest, protective forest, and exploitative forests). The forest stands with high carbon stock are mostly based in forest group I where any forest activity is prohibited and in group II where special regulations of forest management apply to provide critical ecosystem services such as soil, air, water and man's living environment protection. The wetlands, which contains high carbon value have a strict protection regime according to Lithuanian legislation. Forestry practices were first suspended in wetland forest stands situated around large bogs, due to the establishment of strict nature reserves of large wetlands. In the 1970s forestry practices were suspended in other valuable forest on account of the creation of nature reserves. Three areas of UNESCO world heritage have been established in Lithuania. Sites are state owned and no active forestry takes place on the sites. Five Ramsar convention areas have been designated in Lithuania. Four of them are under strict protection, and one is managed under the nature management plan. Other important factors for the biodiversity landscape include valuable forest in national parks, regional parks and the biosphere reserve. All of them are managed under the nature management plans or not managed at all. Currently there is no evidence, that the remaining important large scale forest is impacted by forestry practices. The forest operations must be planned and implemented according to the requirements set out in the regulations on forest cuttings. In the regulation of forest cuttings various bans to extract biomass in order to protect ecosystems are clearly defined, for instance there is a ban on burning biomass in forests and extracting it from certain forest site types (with poor soil layer) or from forests of group II etc. The forest statistics indicate that during the last decade and after 2008 no changes occurred in the protected areas of high carbon stocks (wetlands and peat lands), therefore no biomass could be sourced from areas that had high carbon stocks in January 2008. The high carbon stocks in wetlands, peat lands and old mature forest stands, protected under various protection regimes could easily be found based on forest inventory data, forest statistics and information available on the website of the State Forest Service. These areas are clearly indicated and known to forest owners and managers. For more details see the indicators 2.10.2 and 2.1.1.</p> |
| Means of Verification | <ul style="list-style-type: none"> <li>• Maps, procedures and records</li> <li>• Regional, publicly available data from a credible third party</li> <li>• The existence of a strong legal framework in the region</li> <li>• Interviews with experts</li> </ul>   |
| Evidence Reviewed     | <ul style="list-style-type: none"> <li>• <a href="#">Regulations and schedule of procedures on assigning the forests to forest categories</a> (2001-09-26 No. 1171, Decision of The Government).</li> <li>• <a href="#">Low on Protected Areas</a> (1993-12-09 No. I-301).</li> <li>• <a href="#">Baltic Forest Mapping</a> (2003).</li> <li>• Lithuanian Spatial information Portal (<a href="http://www.geoportal.lt">www.geoportal.lt</a>).</li> <li>• <a href="http://www.natura2000info.lt">www.natura2000info.lt</a></li> <li>• Lithuanian National Forest Inventory 2008-2010. Forest resources and their dynamics (2010, Ministry of Environment of the Republic of Lithuania).</li> <li>• <a href="#">Audit of past and ongoing natural areas inventory and mapping projects, methods and results in Lithuania.</a> (2010, Nature Research Centre)</li> </ul>  |
| Risk Rating           | <input checked="" type="checkbox"/> <b>Low risk</b> <input type="checkbox"/> <b>Specified risk</b> <input type="checkbox"/> <b>Unspecified risk</b>   |

|                       | Indicator  |
|-----------------------|--|
| 2.9.2                 | Analysis demonstrates that feedstock harvesting does not diminish the capability of the forest to act as an effective sink or store of carbon over the long term.  |
| Finding               | <p>According to the procedures approved by the Minister of Environment on reporting and data collection related to land use, land use change and forestry, the State Forest Service is responsible for carrying out accounting of carbon dioxide (CO<sub>2</sub>) in forestland. The results of the reports from the last decade indicate that the land use and forestry sector was a net absorber of CO<sub>2</sub> with the exception of the year 1996-1997, because wind storms and insect invasion led to forest being cut for sanitation purposes with the resultant loss of surface biomass. However, during the recent years land use and the forestry sector annually absorbs about 10.5 million tonnes of CO<sub>2</sub>. The methodology for calculating CO<sub>2</sub> in Lithuanian forest, as well as legal acts regulating this issue, can be found on the website of the <a href="#">State Forest Service</a>. The databases of CO<sub>2</sub> accumulation can be found on the same website. In addition, two studies have been conducted in order to examine the land and forest use changes during the last decade: 1) the evaluation of forest land change in Lithuania 1990-2011; and 2) changes of parcels, meadows, urban territories and other land use areas in Lithuania 1990-2011. Other scientific studies indicate that carbon sequestration constitute 20.2% of the total annual forest value calculated, taking into account all forest functions. It is the second largest after timber production, which reaches 33.8% of total annual forest value (total annual forest value is 1,410.7 thousand Lt.). The annual CO<sub>2</sub> sequestration in Lithuanian forest in 1990-2003 increased slightly year on year from 446 million tonnes in 1990 to 548 million tonnes in 2003. Forest inventory data in Lithuania has been available since 1969 and the forest statistics including forest land use change, forest coverage, forest conversion and other related information is available on the website of the <a href="#">State Forest Service</a>. The monitoring data and forest inventory indicate that the total forest coverage is increasing, the cutting rate is lower than the forest increment and the structure of forest stand according to forest site does not show any increase in poor forest stands. It shows the potential for biomass market to operate in accordance with sustainability criteria. The detailed statistical information about forest use and forest increment is calculated using the forest inventory and monitoring data. The analyses of the last decade (2003-2012) show that the gross mean annual increment in Lithuanian forests was 17.80 million m<sup>3</sup>, the volume of mean cuttings 8.97 million m<sup>3</sup>, and accumulation per year 5.89 million m<sup>3</sup>. The main planning document where the assessment of inventory data and subsequent planning, implementation and monitoring are defined for forest owners is the forest management plan. The regulations on the preparation of forest management schemes and forest management plans defines the procedures for preparation, approval, update and registration, and content and quality review of forest management plans for both state and private forest owners. Forest management plans are prepared for a period of ten years and include forest inventory analyses, monitoring results and the description of the impact of forest management during the previous period. During the preparation process of the new management plan all relevant data must be collected and together with analyses of the previous management cycle must be fed into new management planning and consequently into operational practice. Taking into account the aforementioned, there is no indication that forest activity could cause damage and negatively impact on the forest function as a net CO<sub>2</sub> absorber. For more details, please see indicator 2.3.1.</p> |
| Means of Verification | <ul style="list-style-type: none"> <li>• Results of analysis</li> <li>• Regional, publicly available data from a credible third party</li> <li>• The existence of a strong legal framework in the region</li> <li>• Interviews with experts</li> </ul>   |
| Evidence Reviewed     | <ul style="list-style-type: none"> <li>• Reporting and data collection related to land use, land use change and forestry, July 29, 2010, decree of the minister of Environment No D1-666</li> <li>• <a href="#">Databases of CO<sub>2</sub> accounting</a></li> <li>• <a href="#">Studies on land and forest land changes</a></li> <li>• <a href="#">List of legal acts related to CO<sub>2</sub> accounting</a></li> <li>• <a href="#">Law on Forest</a> (1994-11-22, Nr. I-671)</li> </ul>   |
| Risk Rating           | <input checked="" type="checkbox"/> <b>Low risk</b> <input type="checkbox"/> <b>Specified risk</b> <input type="checkbox"/> <b>Unspecified risk</b>  |

|                       | Indicator  |
|-----------------------|--|
| 2.10.1                | Genetically modified trees are not used.   |
| Finding               | <p>The main legal acts related to the use of GM trees in Lithuania are as follows: the Law on Environment Protection, the Law on GMO, the Program on Protection and Development of Lithuanian Forest Genetic Resources, and the Regulation on Reforestation and Planting. Other relevant bylaws are mentioned in the source of information section. The Law on GMO establishes the spheres of activities involving genetically modified organisms and genetically modified products, their state management and regulation and also the rights, duties and responsibility of the users of the organisms and products. The law applies to all natural and legal persons who are connected with deliberate release into the environment, use, placing on the market, carrying out of tests and research, and other activities involving genetically modified organisms and genetically modified products. In addition, the Program on Protection and Development of Lithuanian Forest Genetic Resources, the Regulations on Forest Planting Material as well as the Quality Requirements for Forest Plants, Trees and Bushes Seeds describe measures and instruments for protection of natural genetic resources in Lithuanian forest and protecting it against any possible harmful intervention. The use of seeds and saplings for reforestation and planting is clearly described in the Regulation on Reforestation and Planting, which does not include the possibility of using GM trees in the country. According to the Law on GMO the Ministry of Environment receives notifications from natural and legal persons about genetically modified organisms and genetically modified products, gives authorisation for activities involving the use of genetically modified organisms, announces to the public and the institutions authorised by the state, which are responsible for market surveillance and state safety examination, information concerning granting, suspending and revocation of authorisation and concerning cases of accidents. Natural and legal persons who wish to engage in the activities involving the use of genetically modified organisms must be given an authorisation by the Ministry of the Environment. There is no application submitted or authorisation issued concerning the use of GM trees in Lithuania. The state authorities responsible for control of the use of GMO in Lithuania do not have any information or evidence of unauthorised or commercial use of GM trees in Lithuania. The State Forest Service is responsible for management of the Lithuanian Register of Forest Seeds where information on every registered seed is held, regardless of whether the seed is genetically modified or not. No genetically modified seeds are included in the register. The Lithuania forest research institute states that there are no genetically modified seeds of woody plants in the country and there is no capacity to breed or produce genetically modified seeds of woody plants.</p> |
| Means of Verification | <ul style="list-style-type: none"> <li>• Reference sources, interviews and records show that GMOs are not used</li> <li>• Public reports</li> <li>• Legislation</li> </ul>   |
| Evidence Reviewed     | <ul style="list-style-type: none"> <li>• <a href="#">Law on Environmental Protection (21 January, 1992 No. I-2223)</a></li> <li>• <a href="#">Law on Genetically Modified Organisms (12 June 2001 No. IX-375)</a></li> <li>• <a href="#">Law on National Plant Genetic Resources, No IX-533/9 October 2001</a></li> <li>• <a href="#">Order No 110 of the Minister of Environment of 7 March 2003 "Program on Protection and Development of Lithuanian Forest Genetic Resources"</a></li> <li>• <a href="#">Order No D1-199 of the Minister of Environment of 14 April 2008 "Regulation on Reforestation and Planting"</a></li> <li>• <a href="#">Order No 457 of the Minister of Environment of 23 August 2002 "Register of the Base of Lithuanian Forest Seeds"</a></li> <li>• <a href="#">The Order of the Minister of Environment No D1-651/30 November 2007 "Regulations on Forest Planting Material"</a></li> <li>• <a href="#">The Order of the Minister of Environment No 337/8 July 2003 "The Quality Requirements for Forest Plants, Trees and Bushes Seeds"</a></li> </ul>  |
| Risk Rating           | <input checked="" type="checkbox"/> <b>Low risk</b> <input type="checkbox"/> <b>Specified risk</b> <input type="checkbox"/> <b>Unspecified risk</b>  |

## Annex 2: List of experts consulted and contacts of Working Body

| Expert                | Qualification  | Role   |
|-----------------------|--|--|
| Saulius Skuja         | The Fund of Environmental Project Development  | Consulted areas related to high conservation value forests, environmental protection, etc  |
| Remigijus Karpuška    | The Lithuanian Fund for Nature   | Consulted areas related to high conservation value forests, environmental protection, etc  |
| Gediminas Brazaitis   | Professor, Lithuanian University of Aleksandras Stulginskis, Faculty of Forest Science and Ecology | Consulted indicators related to social issues, high conservation value forests, environmental protection, carbon balances                              |
| Petras Algirdas Rauka | The Federation of Lithuanian Forest and Wood Worker Trade Unions                                   | Consulted indicators related to social, health and safety issues   |
| Rytis Kuliešis        | UAB Stora Enso Lietuva   | Consulted indicators related to economic indicators and timber production issues   |
| Gerimantas Gaigalas   | NEPCon LT deputy director  | Main person responsible for report, areas related to forest conversion, GMO and indicators related to legality, national and international legislation |
| Justinas Janulaitis   | NEPCon LT director   | Consulted indicators related to legality, national and international legislation as well as chain of custody issues                                    |
| Ieva Petkūnė          | NEPCon LT staff  | Consulted indicators related to social policy, taxes, economic indicators  |

|                |                                |   |
|----------------|--------------------------------|---|
| Ondrej Tarabus | NEPCon Czech Republic staff    | Consulted indicators related to chain of custody implementation, etc                      |
| Danas Augutis  | The Lithuanian Fund for Nature | Consulted areas related to high conservation value forests, environmental protection, etc |

Working body: NEPCon, coordinator: Gerimantas Gaigalas, [gg@nepcon.net](mailto:gg@nepcon.net), phone: +370 61625024

## Annex 3: List of publications used

List of documents, research, statistics used. (*The list of legal acts, rules and procedures are available in the Annex 1 table*).

- [The Integrated Tariff of the Republic of Lithuania database LITAR](#); constantly updated
- [Annual Report from Customs of the Republic of Lithuania](#); 2013
- [Statistical data on forest protection in 2013](#) (State Forest Service, 2013)
- [State Tax Inspectorate database of tax payers in Lithuania](#); constantly updated
- Data portal for registering and using Digital maps or Forest Cadastre, with includes information about known nesting sites (fees apply, <http://www.amvmt.lt:81/vmtgis/>); constantly updated
- [Baltic Forest Mapping](#) (Project report 2003)
- Lithuanian Spatial information Portal ([www.geoportal.lt](http://www.geoportal.lt)); constantly updated
- Information about NATURA2000 territories in Lithuania ([www.natura2000info.lt](http://www.natura2000info.lt)); constantly updated
- Lithuanian National Forest Inventory 2008-2010. Forest resources and their dynamics (2010, Ministry of Environment of the Republic of Lithuania); constantly updated
- [State Forest Service under the Ministry of Environment \(Forest statistics 2013\)](#)
- [State Forest Service under the Ministry of Environment \(Forest statistics 2014\)](#)
- [Data on State ambient air monitoring](#) (Environmental Protection Agency); constantly updated
- [List of the plant protection products allowed to use in the forests](#) valid
- [On line database of registered plant protection products](#); constantly updated
- [Forest Condition in Europe Technical Report of ICP Forest 2013\)](#)
- Report of [UNECE/FAO 2004](#)
- [Publications and news about traditional communities, issued by the Council of traditional communities](#); constantly updated
- Reports of [the Ministry of Social Security on implementation of the United Nations Convention on the rights of the child in Lithuania; \(2009-2015\)](#)
- [European Commission against Racism and Intolerance report on Lithuania, 2011 09 13](#)
- [European Commission Euro barometer Discrimination in the EU, 2012. Results of Lithuania](#)



- [Lithuanian Trade Union Confederation report \(2006-2010\)](#)
- [Report from State Labour Inspectorate, 2012](#)
- [Eurofund report on Tackling undeclared work in the European Union, 2013](#)
- [Report from State Labour Inspectorate, 2012 \(I\)](#)
- [Report from State Labour Inspectorate, 2012 \(II\)](#)
- [Report from State Labour Inspectorate, 2013](#)
- [Databases of CO<sub>2</sub> accounting; 2012](#)
- [FSC National Risk Assessment for Lithuania, 2014](#)

## Annex 4: List of stakeholders

The descriptions of each of the stakeholders listed below are taken from websites and/or other sources of information and, therefore, do not represent the view of SBP.

- **Lithuanian Biomass Energy Association LITBIOMA** was established in the summer of 2003 and is currently comprises 52 members. The association involves the producers and suppliers of solid biofuel and other renewable local resources, such as wood, straw, energetic willows, peat, as well as the producers and designers of biofuel boiler rooms and other equipment, developers of plantations and academic institutions. Contacts: [vilma.gaubyte@biokuras.lt](mailto:vilma.gaubyte@biokuras.lt) phone: +370 5 2195630
- **Bionovus** is an active member of Lithuanian biomass energy association, LITBIOMA. It often initiates various types of projects in the areas of biofuel production, harvesting and production, and offers long-lasting cooperation agreements not only for the operators of the country but also in neighbouring countries. The company also actively contributes to the development of the local renewable fuel market. Successful financial results of the Bionovus Group of companies are determined by active investment in the development of biofuel production base and resources; a diversity of services also contributes to the company's success. Contacts: [info@bionovus.lt](mailto:info@bionovus.lt) phone: +370 5 2394930
- **Lithuanian Confederation of Renewable Resources** unites all Lithuanian NGOs working in developing renewable energy resources and spreading green energy ideas while creating conditions for it to become reality with obvious results. Contacts: [info@ateitiesenergija.lt](mailto:info@ateitiesenergija.lt) phone: + 370 699 59608.
- **The Association of Biomass Manufacturers and Consumers (ABMC)** is a non-profit seeking organisation that promotes the use of renewable resources for energy production at the national and international level. The Association represents its members/biomass producers in dealing with business development, process management, advanced technology introduction, product quality (standardisation), marketing and policy issues. The Association of Biomass Manufacturers and Consumers is a unifying force, open to all natural and legal persons who seek to develop the biomass collection and processing and biofuel production activities. Contacts: [info@bio-mase.lt](mailto:info@bio-mase.lt) phone: +370 620 96009.
- **Graanul Invest** is a privately owned company, established in 2003, and operates in the fields of forestry, development of bioenergy and production of renewable energy. The goal of the company is to produce and supply nature-friendly and high-quality products to its customers and contribute to

the preservation of the environment by providing renewable fuel to the market and reduction of waste from conventional fossil fuel based energy. Contacts:

[mindaugas.puodziunas@graanulinvest.com](mailto:mindaugas.puodziunas@graanulinvest.com) phone: +370 682 66065.

- **The Lithuanian Fund for Nature (LFN)** is a non-governmental organisation for the conservation of nature. Its activities are closely related to the preservation of wildlife. The LFN's activities include cooperation with national, municipal, scientific, non-governmental, and private institutions in these areas of preservation of rare and disappearing species and their habitats, maintenance and restoration of natural habitats, preservation of water bodies and resources therein, and environmental education. Contacts: [remigijus@gamtosakademija.lt](mailto:remigijus@gamtosakademija.lt) phone: +370 684 63709.
- **Forest Owners Association of Lithuania (FOAL)** represents the interests of family forest owners at the national and international levels, and after more than 20 years of activity has grown into a social organisation, uniting over 6,500 members. Accepted as a member of the Confederation of European Forester Owners (CEPF), European Landowners Organisation (ELO), International Family Forestry Alliance (IFFA), and supported by Danish, Swedish and other organisations, FOAL unifies private forest owners. Contacts: [info@forest.lt](mailto:info@forest.lt) phone: +370 5 2767590.
- **General State Forests Enterprise** under the Ministry of Environment conducts the economic management of state-owned forests attributed to state forest enterprises, organises and co-ordinates restoration, maintenance, protection and utilisation of forests and forest resources enhancing the ecological, environmental, economic, recreational and other socially important values of state forests as the most important components of the whole state forestry by managing them in accordance with the principles of sustainable forest use and by rational use, restoration and enlargement of forest resources. Contacts: [d.stonys@gmu.lt](mailto:d.stonys@gmu.lt) phone: +370 5 2734021.
- **Aleksandras Stulginskis University** is a state institution of higher education and research, which is constantly improving its activity and meeting the highest expectations of society needs. At present it has over 5,000 students in a wide range of study programmes of biomedicine, technologies and social sciences. It is the state institution of higher education and research in Lithuania awarding the diplomas and degrees at PhD, MSc and BSc levels in the fields of food sciences, agriculture, forestry, water and land resources management, bioenergy and mechanical engineering, climate change and sustainable use of natural resources. Contacts: [gediminas.brazaitis@asu.lt](mailto:gediminas.brazaitis@asu.lt) phone: +370 61220544.
- **Nature Heritage Fund (NHF)** - a non-profit, non-governmental environmental organisation was established in 2001 with an aim to represent environmental interests, raise environmental

awareness, assist in policy making as well as implement concrete landscape, biodiversity conservation measures. The Nature Heritage Fund is active in all Lithuania focusing on strengthening protected areas as epicentres for sustainable development in the country. The organisation works in close cooperation with administrations of protected areas, municipalities, local communities as well as other environmental non-governmental organisations active in the country and abroad. Contacts: [info@gpf.lt](mailto:info@gpf.lt) phone: +370 5 272 1918

- **GECO Energy Company** is a leading Lithuanian capital company group, investing in and implementing renewable energy projects in Lithuania and other Baltic and East European States. The primary target of the company's investment is generation of heat from biofuel. Our company builds and manages biofuel boiler houses, supplying heat to centralised district heating networks. Contacts: [info@geco.lt](mailto:info@geco.lt) phone: +370 5 2661266.
- **EUROMEDIENA.** The company's activity targeted to promote biotechnology can be effectively harnessed to improve the environment, in particular to meet the fast growing needs for biomass by wood processing industry and energy sectors. Their activity is related to core R&D driven businesses, sale of clonal hybrid aspen saplings, establishment and management of fast growing clonal hybrid aspen plantations, R&D and commercialisation of new forest biotech products (without genetic modification). Contacts: [mindaugas.silininkas@euromediena.com](mailto:mindaugas.silininkas@euromediena.com) phone: +370 698 79911.
- **UAB Granulita.** It is the wood pellet producer with an annual production to 70,000 tones. Its mission is to produce the highest quality eco-friendly fuel based on minimal costs and optimum heat energy obtained. Contacts: [info@granulita.lt](mailto:info@granulita.lt) phone: +370 42265801.
- **UAB Biodela** is a private enterprise, 100% Lithuanian limited liability company, established in 2007. More than five years on the market has led the company to a reputable position. In 2011 the company was awarded for an exemplary credit management, in 2012 the company was nominated among Top 500 fast-growing companies in Lithuania. Up to date, more than 4000 trailers of wood pellets, briquettes, firewood and straw pellets were exported to the markets of Austria, Belgium, Denmark, Finland, France, Germany, Ireland, Italy, Luxembourg, Malta, Norway, Slovenia, Sweden, The Netherlands, and The United Kingdom. Contacts: [info@biodela.lt](mailto:info@biodela.lt) phone: +370 63300014.

## Annex 5: Stakeholder consultation report

This report contains an overview of stakeholder consultation process and a summary of outcomes of the stakeholder consultation process for the RRA for Lithuania. The risk assessment was conducted as part of SBP risk assessment process in accordance with SBP Risk Assessment Procedure (V 1.0). The Stakeholder consultation report was prepared in accordance with the SBP Risk Assessment Procedure (V 1.0) clause 4.13.

| Stakeholder Type                               | Stakeholders Notified<br># of individuals (# of institutions represented) | Stakeholders consulted directly or provided input (#) |
|--|---|---|
| Biomass, timber processing industry, companies | 5   | 3   |
| Non-governmental organisations                 | 3   | 1   |
| Authorities, government agencies               | 2   | 1   |
| Associations                                   | 3   | 2   |
| Forest owners associations                     | 1   | 1   |
| Academic, research institutions                | 1   | 1   |

Table 1. Stakeholders involved in SBP risk assessment stakeholder consultation process

### Stakeholder consultation process

#### First round

After the first draft of the Lithuanian risk assessment was prepared and discussed with SBP, it was presented to key stakeholders at a workshop, organised by NEPCo and SBP, held on 27 November 2014 in Vilnius, Lithuania. All stakeholders related to biomass production in Lithuania, as well as SBP, were invited to participate in the workshop. The list of possible stakeholders was initially indicated in the project proposal. Those participating in the workshop were:

- **Lithuanian Biomass Energy Association LITBIOMA**, established in the summer of 2003 currently with 52 members. The association involves the producers and suppliers of solid biofuel and other renewable local resources, such as wood, straw, energetic willows, peat, as well as the producers and designers of biofuel boiler rooms and other equipment, and developers of plantations and academic institutions.
- **Graanul Invest**, a privately owned company established in 2003, and operating in the field of forestry, development of bioenergy and production of renewable energy. The stated goal of the

company is to produce and supply nature-friendly and high-quality products to its customers and contribute to the preservation of the environment by providing renewable fuel to the market.

- **GECO Energy Company**, a leading Lithuanian capital company group, investing in and implementing renewable energy projects in Lithuania and other Baltic and East European Countries. The stated primary target of the company's investment is generation of heat from biofuel. The company builds and manages biofuel boiler houses, supplying heat to centralised district heating networks.
- **EUROMEDIENA**, a company promoting biotechnology to improve the environment and in particular to meet the fast growing needs for biomass by the wood processing industry and energy sectors. Its activities are related to core R&D driven businesses, sale of clonal hybrid aspen saplings, establishment and management of fast growing clonal hybrid aspen plantations, R&D and commercialisation of new forest biotech products (without genetic modification).
- **The Lithuanian Fund for Nature (LFN)**, a non-governmental organisation for the conservation of nature. Its activities are closely related to the preservation of wildlife. The LFN's activities include cooperation with national, municipal, scientific, non-governmental and private institutions, preservation of areas with rare and disappearing species and their habitats, maintenance and restoration of natural habitats, preservation of water bodies, and environmental education.
- **General State Forests Enterprise** under the Ministry of Environment conducts the economic management of state-owned forests attributed to state forest enterprises, organises and co-ordinates restoration, maintenance, protection and utilisation of forests and forest resources. Its aim is to enhance the ecological, environmental, economic, recreational and other socially important values of state forests as the most important components of the whole state forestry by managing them in accordance with the principles of sustainable forest use and by rational use, restoration and enlargement of forest resources.
- **Aleksandras Stulginskis University** is a state institution of higher education and research. Presently it has over 5,000 students in a wide range of study programmes of biomedicine, technologies and social sciences. It is the state institution of higher education and research in Lithuania, awarding the diplomas and degrees at PhD, MSc and BSc levels in the fields of food sciences, agriculture, forestry, water and land resources management, bioenergy and mechanical engineering, climate change, and sustainable use of natural resources.

### Agenda of the workshop

The workshop started with a presentation on the Sustainable Biomass Partnership (SBP), its mission, activities and future plan (by NEPCon LT Director, Justinas Janulaitis). The presentation also included an overview of the RRA project. Later Gerimantas Gaigalas (NEPCon LT Deputy Director) gave an overview of the SBP Framework, in particular the SBP Standards 1 and 2. That was followed with a presentation by NEPCon staff of the first draft Lithuanian risk assessment and a discussion, and questions and answers session.

### Comments received from stakeholders during workshop

In general, the participants in the workshop welcomed the SBP initiative and the first draft of the RRA for Lithuania and expressed positive views towards the SBP certification process. However, the representatives from Lithuanian Biomass Energy Association, LITBIOMA, and EUROMEDIENA expressed caution related to a possible additional burden for biomass producers to implement future SBP requirements. Although in general they were not against any new requirements, in their opinion the implementation of these requirements should not act as an obstacle or hindrance to the renewable energy sector in terms of competition with fossil fuel. The main concern expressed was in relation to the absence of standards and requirements in the fossil fuel (oil, gas) energy sector, such that conventional energy sources could take advantage of potential additional costs imposed on the renewable energy sector in relation to new requirements, which could make the renewable energy sector less competitive compared to gas and oil energy. In summary, biomass producers could see the potential benefit of the SBP certification, but were keen to stress the risks associated with an unnecessary or imbalanced burden as a result of it.

In regards to the RRA for Lithuania, the discussion focused on the three indicators for which a specified risk level was proposed. For the indicator 1.1.2, the biomass producers proposed to change the risk from specified to low (*Feedstock can be traced back to the defined Supply Base*). The main argument for this was the small portion of feedstock imported and used in the biomass sector in Lithuania. The majority of timber import is re-exported in the form of pulpwood and other timber products. Therefore, it was proposed to review this indicator after 2-5 years to check if the situation had changed. Currently, biomass producers do not see specified risk as the appropriate level of risk for this specific indicator.

In relation to the two remaining indicators where a specified risk level was proposed (indicator 2.8.1: *The BP has control systems and procedures to verify that appropriate safeguards are put in place to protect the health and safety of forest workers*, and indicator 2.1.2: *The BP has control systems and procedures to verify that potential threats of forest management activities to the HCVs are identified and safeguards are implemented to protect them*) the participants generally did not refute that the risk for these indicators exists in Lithuania. However, they expressed concern on the proposed or possible risk mitigation measures that might be placed on them. Although the most effective risk mitigation measures might be best implemented at the governmental and regulatory level. That being especially relevant in relation to risk associated with the protection of Woodland Key Habitats (WKH) in the private sector. According to the biomass producers, this could easily be solved by legislative measures introducing a protection regime for WKH. The biomass producers agreed to address the Minister of Environment with the proposal to introduce these legislative measures. At the end of the workshop it was agreed to give additional time for stakeholders to analyse the three indicators where a specified risk level was proposed, and the opportunity to provide written comments and arguments in support of their position. It was agreed that all interested stakeholders wishing to comment on these indicators would do so no later than 9 January 2015.

### Second round

After the workshop, the parts of the first draft RRA for Lithuania relevant to the specified risk level were sent to stakeholders for additional comment. By 9 January 2015, the written comments from the Lithuanian Biomass Energy Association (LITBIOMA), EUROMEDIENA and the Association of Private Forest Owners were received. After analysis of the written comments, the relevant stakeholders were contacted and additional discussions held. Taking into account the position of all stakeholders, the results of analysis, and

additional information a final conclusion was reached. A brief overview of the final status for the three indicators after the stakeholder consultation process is provided below.

### 1.1.2 Feedstock can be traced back to the defined Supply Base

Consensus among stakeholders to change the level of risk from specified to low for this indicator was reached. Initially, specified risk was proposed for this indicator in relation to a supply base of sawmills and other timber processing entities that might import timber for biomass production from other countries which might not be tracked back to the supply base (and is out of the scope of this risk evaluation as this material cannot be traced to the forest in Lithuania) and/or might mix it with the local timber during the biomass production process. However, the majority of imported timber is re-exported to other countries as pulpwood products or consumed in internal markets. Therefore, only a small amount of imported timber could be used for biomass production. However, the additional analyses and information gathered during the stakeholder consultation process shows that, currently, the amount of imported timber used for biomass production in Lithuania is very small and insignificant. During the stakeholder consultation process the stakeholders agreed to change the level of risk for this indicator from specified to low.

### 2.1.2 The BP has control systems and procedures to verify that potential threats of forest management activities to the HCVs are identified and safeguards are implemented to protect them

The Lithuanian Biomass Energy Association (LITBIOMA), EUROMEDIENA and the Association of Private Forest Owners provided additional statistical information about the situation and condition of WKH and potential WKH in Lithuanian forests, mainly arguing that the statistical data are not very different in private forest and in state forest. The argument to change the level of risk for this indicator was partially based on additional statistical data and partially on the low probability that timber from WKH in private forests will reach the biomass producer. However, the information provided by other stakeholders (Lithuanian Fund of Nature and other environmental stakeholders) indicates that the situation concerning WKH and reasons for damage to WKH in private forest differs from the reasons for damage to WKH in state forest. The protection measures and regulatory framework for protection of WKH and potential WKH in state forest is clear and well implemented. It should be noted that during the FSC NRAF stakeholder consultation process this issue was discussed and analysed and the same conclusion reached among stakeholders. The situation since then has not changed and there is therefore no reason to review the level of risk for this indicator. It was considered that many preventative measures to avoid damage to WKH (except where caused by natural calamities) have been implemented in state forest because of the FSC certification process (all state forest enterprises are certified according to FSC scheme), whereas these measures may not have been implemented in private forest, where private forest is not certified. Taking into account the additional information and given that no consensus among different stakeholders was reached for this indicator (especially between environmental and economic stakeholders), it was decided to maintain the level of risk for this indicator as specified. For a detailed description about this indicator, please see Annex 1.



### 2.8.1 The BP has control systems and procedures to verify that appropriate safeguards are put in place to protect the health and safety of forest workers

The Lithuanian Biomass Energy Association (LITBIOMA), EUROMEDIENA and Association of Private Forest Owners provided additional statistical information about serious injuries in the forest sector in Lithuania, comparing it with the situation in other EU countries and especially those with high health and safety standards for forest workers. Their argument was that it is impossible to completely eliminate serious injuries in the forest sector. Within the forest sector in EU, however, Lithuania has the highest risk in relation to health and safety. The aforementioned stakeholders stated that the regulatory framework in Lithuania is operational and is sufficient for tackling the problem. Further, compared to other countries the situation in Lithuania is not as bad as it was presented in the RRA. However, these arguments were not considered sufficient or substantial enough to change the level of risk for this indicator. Other stakeholders argued to leave the risk level at specified risk for this indicator because of the numerous arguments presented during the workshop and the first draft of RRA. It should be noted that during the FSC NRAF stakeholder consultation process the same problem was discussed and analysed and the same conclusion reached among stakeholders. The situation since then is considered not to have changed and there is therefore no reason to revise the level of risk for this indicator. Taking into account the additional information and that no consensus among the different stakeholders was reached for this indicator (especially between social, environmental and economic stakeholders), it was decided to leave the level of risk as specified for this indicator. For detailed information about this indicator, please see Annex 1.

### Annex 1: A summary of stakeholder consultation results

| <b>SBP indicator</b> | <b>SBP risk assessment process proposal / nepcon</b> | <b>Biomass, timber processing industry opinion</b> | <b>non-governmental organisation opinion</b> | <b>Final version</b>  |
|----------------------|--|--|--|-----------------------|
| 1.1.2                | Specified risk                                       | <b>Low risk</b>                                    | No comments                                  | <b>Low risk</b>       |
| 2.1.2                | Specified risk                                       | <b>Low risk</b>                                    | No comments                                  | <b>Specified risk</b> |
| 2.8.1                | Specified risk                                       | <b>Low risk</b>                                    | No comments                                  | <b>Specified risk</b> |

SBP Indicators, discussed in stakeholder consultation process

1.1.2 Feedstock can be traced back to the defined Supply Base

2.1.2 The BP has control systems and procedures to verify that potential threats of forest management activities to the HCVs are identified and safeguards are implemented to protect them.

2.8.1 The BP has control systems and procedures to verify that appropriate safeguards are put in place to protect the health and safety of forest workers.

## Annex 2: Stakeholder comments

| Rodiklis   | Siūlymas rodikliui nustatyti DIDELĮ rizikos lygį  | Didelė rizikos mažinimo priemonės   | Siūlymas rodikliui nustatyti MAŽĄ rizikos lygį   |
|--|---|---|--|
| <p>Rodiklis 1.1.2. Žaliava turi būti atsekama tiekimo grandinėje</p> <p>(Didelė rizika).</p> | <p>Šiam rodikliui buvo pasiūlyta nustatyti didelę riziką specifinei ir siaurai sričiai, kuri susijusi su lentpjūvėmis ir kitomis medienos perdirbimo įmonėmis, galinčiomis importuoti žaliavą biokuro gamybai iš kitų šalių, ypač iš tų, kurios turi aukštą korupcijos suvokimo indeksą (Baltarusija, Rusija ir t.t.) ir / ar gamybos proceso metu vietinę žaliavą maišyti su importuota.</p> <p>Statistiniai duomenys rodo, kad apvaliosios ir pjautinės medienos bei kitų medienos produktų importas iš aukštą korupcijos suvokimo indeksą turinčių šalių Lietuvoje vis dar sudaro didelę dalį. Nors didžioji importuojamos medienos iš tokių šalių dalis yra reeksportuojama popiermedžių pavidalu į kitas šalis arba suvartojama vidaus rinkoje ne biokuro gamybos srityje, vis dėlto maža šios medienos dalis perdirbimo metu gali būti maišoma su vietine žaliava ir patiekama rinkai kaip biomasės produktai. Kadangi biomasės produktų gamybos procesas lentpjūvėse yra gana sudėtingas, turint</p> | <p><i>Jei sutinkate su siūlymu rodikliui nustatyti DIDELĮ rizikos lygį, išvardinkite, kokios, jūsų manymų, galėtų būti šios rizikos mažinimo priemonės...</i></p> <p>Pavyzdžiui:</p> <ol style="list-style-type: none"> <li>1. Biomasės žaliavos atskyrimas gamybos proceso metu nuo importuotos ar nenustatytos kilmės žaliavos.</li> <li>2. Biomasės žaliavos pirkimas iš sertifikuotų tiekėjų.</li> <li>3. Kitos...</li> </ol> | <p><i>Jei nesutinkate su siūlymu rodikliui nustatyti didelę riziką, išvardinkite argumentus, dėl ko šiam rodikliui turėtų būti nustatyta maža rizika...</i></p> <p>Nesutinkame, kad Lietuvai būtų priskiriama didelė rizika pagal rodiklį "1.1.2. Žaliava turi būti atsekama tiekimo grandinėje". Vertinimo metodikoje turi būti apibrėžiama, kokiais kiekybiniais parametrais apibrėžiamas rizikos lygis, tačiau vien tik teiginys, kad mediena galimai importuojama iš Rusijos ar Baltarusijos, todėl priskiriamas "didelis" žaliavos atsekamumo grandinėje lygis yra visiškai nelogiškas.</p> <p>Siūloma rizikos mažinimo priemonė, kad gamybos procese žaliava būtų atskiriama pagal kilmės vietą yra taip pat nelogiška, nes ji arba technologiškai neįgyvendinama arba toks atskyrimas yra ekonomiškai nepagrįstas (labai brangus).</p> <p>Jei rizikos vertinimą grįsti tik "importo galimybe", kaip kad numato dabartinis rizikos vertinimas – vadinasi visos ES valstybės vertindamos šį</p> |




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|  | <p>omenyje žaliavos atsekamumą iki pirminio šaltinio (ypač, kai tai susiję su aukštą korupcijos suvokimo indeksą turinčiomis šalimis) ir jos atskyrimą gamybos proceso metu, buvo pasiūlyta šiam rodikliui (tik aukščiau nurodytai sričiai) nustatyti didelę riziką. Nors šiuo metu biomasės produktų gamybos kiekiai, maišant vietinę žaliavą su importuota iš šalių, turinčių aukštą korupcijos suvokimo indeksą, yra labai maži, tačiau ateityje, didėjant biomasės produktų paklausai ir pasiūlai, šie kiekiai gali ženkliai išaugti. Taip pat pastaruoju metu didėja biomasės tiekimas iš žemės ūkio paskirties žemės bei kitos žemės. Tai taip pat gali būti potenciali rizika, susijusi su žaliavos atsekamumu tiekimo grandinėje.</p> |  | <p>rodiklį turi nurodyti, kad yra didelės rizikos zonoje (nes visos importuoja medieną iš Rusijos, Baltarusijos, Ukrainos, ar kitų aukštą korupcijos indeksą turinčių šalių), dėl ko būtų galima stipriai abejoti (t.y. nebūtų net prasmės vertinti tokios rizikos). Mūsų nuomone, vertinti reiktų importo biokuro mastą, kuris Lietuvoje yra nereikšmingas, todėl Lietuva negali būti priskiriama didelės rizikos zonoje esančioms šalims. Importuojama žaliava iš Baltarusijos ir Rusijos daugiausia yra reeksportuojama arba perdurbama medienos perdurbimo įmonėse, vadinasi tik neženkli importo dalis gali nukeliauti į biokuro gamybą – tas akivaizdžiai pripažįstama ir rizikos vertinimo ataskaitoje. Nesutinkame, kad rizikos nustatymas yra pagrįstas prielaida, kad medienos žaliavos importas "gali išaugti". Atvirkščiai – numatoma apriboti medienos žaliavos ir energetinių produktų eksportą iš Baltarusijos – vadinasi Lietuvoje importas - gali mažėti. Taip pat neaišku, kodėl biokuro žaliavos tiekimas, kaip žemės ūkio veikla priskiriamas didelei rizikai – visur propaguojama, kad biomasės auginimas žemės ūkio žemėje prisideda prie miškų tvarumo (mažina</p> |
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|  |   |   | “spaudimą” tradiciniams miškams, ES tarp žemės ūkio veiklų trumpos rotacijos želdinių veikla priskiriama “žalinimo” priemonėms).   |
| <p>Rodiklis 2.1.2.<br/>Biomasės gamintojai turi kontrolės sistemą ir procedūras įvertinti potencialias miškų tvarkymo grėsmes Ypatingos vertės miškams ir imtis atitinkamų apsaugos priemonių.</p> <p><i>(Didelė rizika)</i></p> | <p>Tipiniai natūralių miškų buveinių ir vertingų ekosistemų plotai Lietuvoje yra inventorizuoti, identifikuoti ir saugomi pagal Buveinių direktyvą (Tarybos direktyva 92/43 / EEB dėl natūralių buveinių ir laukinės faunos bei floros) arba priskirti NATURA 2000 teritorijų tinklui. Taip pat Lietuvoje yra išskirtos Kertinės miško buveinės (KMB), kurių dalis turi nustatytą ir reglamentuotą apsaugos režimą (biosferos poligonai, NATURA 2000 teritorijos) arba yra saugomos savanorišku pagrindu. Rizikos vertinimo metu surinkti duomenys bei analizė rodo, kad KMB plotams, esantiems privačiuose miškuose, yra padaryta nemažai žalos. Tyrimų metų surinkti duomenys rodo, kad 20% esančių KMB buvo padaryta ženkli žala, iš kurių didžioji dalis padaryta privačiuose miškuose. KMB apsauga privačiuose miškuose nėra reglamentuota ir yra savanorišku pagrindu. Dėl aukščiau minėtų priežasčių buvo pasiūlyta šiam rodikliui nustatyti didelę riziką, susijusią su KMB apsauga</p> | <ol style="list-style-type: none"> <li>1. Biomassės žaliavos kilmės tikrinimas prieš priimant žaliavą, siekiant nustatyti, ar ji netiekama iš KMB plotų</li> <li>2. Tiekėjo rašytinis įsipareigojimas netiekti žaliavos iš KMB plotų</li> <li>3. KMB apsaugos režimo nustatymas ir įteisinimas.</li> <li>4. Kitos...</li> </ol> | <p>Nesutinkame su vertinimu, kad pasiūlyta šiam rodikliui nustatyti didelę riziką, susijusią su KMB apsauga privačiuose miškuose.</p> <p>Pirmą kartą Lietuvoje kertinių miško buveinių inventorizacija atlikta 2002-2004 m. Šios inventorizacijos metu buvo išskirtos 8902 (P)KMB 26427,6 ha plote. Iš jų 5609 vnt.– KMB, o 3293 vnt.– PKMB.</p> <p>2013m buvo pakartotinai vertintos kertinės miško buveinės ir potencialios kertinės miško buveinės. Per pastaruosius 10 metų 89,0% KMB būklė išliko stabili ar pagerėjo, 4,5 % - pablogėjo, 6,5 % buveinių buvo sunaikintos. PKMB būklė pagerėjo 28,4% buveinių, 44,2% - išliko stabili ir 27,4 % - būklė pablogėjo ir šios buveinės buvo panaikintos. Bendras (P)KMB skaičius sumažėjo 12,6% (nuo 9140 iki 7984 vnt.).</p> <p>2013m. inventorizacijos metu 1282 (P)KMB buveinės buvo panaikintos, iš kurių 622 vnt. privačiuose miškuose ir 660 vnt. valstybiniuose miškuose. T.y. valstybiniuose miškuose panaikinta daugiau (P)KMB</p> |

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|  | <p>privačiuose miškuose.</p>  |   | <p>nei privačiuose valdose, kas neatitinka rizikos vertinimo ataskaitos teiginių.</p> <p>2013 m. po inventorizacijos – naujai buvo įsteigta 161 nauja (P)KMB, iš kurių 106 valstybiniuose miškuose ir 55 privačiuose valdose.</p> <p>Manome, kad medienos žaliavos kiekis, kuris gali patekti biokuro gamybai iš (P)KMB yra labai nereikšmingas. Nemaža dalis (P)KMB patenka po kitų saugomų teritorijų reglamentavimu, todėl rizika šiuo atveju nėra didelė.</p>  |
| <p>Rodiklis 2.8.1.<br/>Biomasės gamintojas turi kontrolės sistemą ir procedūras patikrinti, kad atitinkamos apsaugos priemonės yra įgyvendinamos siekiant apsaugoti miško darbininkų sveikatą ir saugumą</p> <p><i>(Didelė rizika)</i></p> | <p>Remiantis įvairiais informacijos šaltiniais, ataskaitomis, duomenų bazėmis, taip pat kitais statistiniais duomenimis kyla abejonų dėl rangovų darbų saugos ir sveikatos reikalavimų laikymosi nesertifikuotuose privačiuose miškuose, nes aukščiau minėti šaltiniai rodo, kad nesertifikuotuose privačiuose miškuose dirbančiose rangovinėse organizacijose periodiškai vyksta sunkūs ir mirtini nelaimingi atsitikimai. Taip pat nėra įdiegtų veiksmingų priemonių, siekiant užtikrinti, kad rangovai, dirbantys nesertifikuotuose privačiuose miškuose, pastoviai laikytųsi sveikatos ir darbų saugos reikalavimų. Valstybinės darbo inspekcijos</p> | <p>Šios priemonės gali būti naudojamos pavieniui arba atskirai, priklausomai nuo žaliavos šaltinio, įmonės tipo ir kitų veiksnių:</p> <ol style="list-style-type: none"> <li>1. Dokumentai, leidžiantys susieti produktą su rangovine organizacija, kuri tiekė žaliavą šio produkto gamybai (jei žaliava buvo tiekama tokiu būdu)</li> <li>2. Rangovas (esant galimybei susieti rangovą su produktu) turi trečios šalies patvirtintą sertifikatą, apimantį darbų saugos ir</li> </ol> | <p>Nesutinkame, kad šioje šiam rodikliui didelę riziką, susijusią su darbų saugos ir sveikatos reikalavimų laikymusi nesertifikuotuose privačiuose miškuose dirbančiose rangovinėse organizacijose.</p> <p>Pagal Lietuvos r. įstatymus visos veiklą vykdančios įmonės turi laikytis darbo saugos reikalavimų (nepriklausomai ar jos dirba FSC sertifikuotuose ar nesertifikuotuose miškuose). T.y. darbo saugos reikalavimai Lietuvoje yra pakankamai griežtai reglamentuoti ir jų privalu laikytis. Dauguma medienos žaliavos patiekia rangovinės organizacijos, kurios dirba tiek valstybiniuose, tiek privačiuose miškuose. Todėl</p> |

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|  | <p>duomenimis pastebima nelaimingų mirtinų atsitikimų skaičiaus augimo tendencija nesertifikuotuose privačiuose miškuose dirbančiose rangovinėse organizacijose. Tai neliečia privačių miškų, kurie yra sertifikuoti pagal FSC sertifikavimo schemą ir kuriuose yra įdiegtos svarios darbų saugos ir sveikatos reikalavimų įgyvendinimo priemonės, kaip to reikalauja FSC standartas. Taip pat tai neliečia valstybinių miškų, kurie sertifikuoti pagal FSC ir LegalSource standartus.</p> <p>Buvo pasiūlyta nustatyti šiam rodikliui didelę riziką, susijusią su darbų saugos ir sveikatos reikalavimų laikymusi nesertifikuotuose privačiuose miškuose dirbančiose rangovinėse organizacijose.</p> | <p>sveikatos reikalavimus (pvz., OHSAS)</p> <p>3. Rangovas (esant galimybei susieti rangovą su produktu) turi galiojančią sutartį su FSC miškų tvarkymo sertifikatą turinčiu subjektu</p> <p>4. Rangovas (esant galimybei susieti rangovą su produktu) turi procedūras, susijusias su darbų saugos ir sveikatos reikalavimų įgyvendinimu.</p> <p>5. Rangovas (esant galimybei susieti rangovą su produktu) turi įsipareigojimą laikytis darbų saugos ir sveikatos reikalavimų ir leidžia trečiajai šaliai atlikti (jei būtina) patikrinimus.</p> <p>6. Trečios šalies ar įmonės atlikti rangovo (esant galimybei susieti rangovą su produktu) patikrinimai (jei būtina) patvirtina, kad yra laikomasi visų darbų saugos ar</p> | <p>teiginiai, kad privačiuose valdose yra didelė darbo saugos rizika, o valstybiniuose miškuose maža – realiai nepagrįsti (tik subjektyviais samprotavimais).</p> <p>Vertinant nelaimingų atsitikimų riziką – reiktų įvertinti visos ES kontekstą, kiek Lietuva šioje srityje atsilieka nuo ES vidurkio (pvz. dirbančiųjų darbuotojų skaičiui).</p> <p>Miškų sektorius visoje ES pasižymi ženkliai didesniu nelaimingų atsitikimų kiekiu dirbančiųjų skaičiui. Pvz. Švedijoje, kuri yra darbo saugos lyderė ES, miškininkystėje dirba 15 tūkst. darbuotojų, o mirtinų nelaimingų atsitikimų skaičius 2012 m. buvo 6. Lietuvoje palyginimui – 11 tūkst. darbuotojų 2012 m. buvo 4 mirtini atvejai, 2013 m. 3 mirtini atvejai. Pagal VDI duomenis absoliuti dauguma mirtinų atvejų miškininkystėje įvyksta dėl darbuotojų kaltės – t.y. darbuotojams nesilaikant vadovų duotų nurodymų ar sąmoningai rizikuojant savo sveikata ar gyvybe.</p> <p>Lyginant tarptautinę statistiką – Lietuvoje darbo saugos klausimais nėra taip blogai, kaip bandoma pateikti rizikos vertinime.</p> |
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|  |  | sveikatos<br>reikalavimų.<br><br>7. Kitos ... |  |
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 Reply  Reply All  Forward



An 2015.01.13 08:42

Mindaugas Silininkas, Euromediena <mindaugas.silininkas@euromediena

Re: **SBP** triju rodikliu pastabos

To Gerimantas Gaigalas; Asociacija LITBIOMA; Algis Gaižutis

Cc Justinas Janulaitis

Sveiki,

Dar viena pastabele del darbo saugos. Nors pas jus teigiama, kad d?l darbo saugos didel? rizika yra isimtinau privaciuose miskuose, nes ten vyksta visi nelaimingi atsitikimai, as vakar pabandziau paanalizuoti, kur 2012 ir 2013 m. ivyko mirtini atsitikimai. **Pagal viesai skelbiama informacija** 2013 m. miskininkysteje buvo du mirtini atsitikimai ir abu vykdant darbus valstybiniuose miskuose, 2012 m. is 4 mirtinu atveju – 2 valstybiniuose miskuose (ar pas ju valdytojus), 1 privaciame miske, ir del 1 neradau informacijos.

Pagarbiai

—  
Mindaugas Šilininkas  
CEO  
Euromediena R&D  
Tel: + 370 698 79911  
Email: [mindaugas.silininkas@euromediena.com](mailto:mindaugas.silininkas@euromediena.com)



## Annex 3: Stakeholder notification

### **Ondrej Tarabus**

---

**From:** Gerimantas Gaigalas  
**Sent:** Wednesday, December 17, 2014 12:36 PM  
**To:** 'Asociacija LITBIOMA'; 'remigijus@gamtosakademija.lt'; 'gediminas.brazaitis@asu.lt'; 'Mindaugas Silininkas, Euromediena'; 'info@forest.lt'; 'Algis Gaižutis'  
**Subject:** SBP triju rodikliu pastabos  
**Attachments:** pastabos del rizikos.docx

Gerbiamieji,

Dėkojame, kad dalyvavote seminare „Darnios biomasės partnerystės (SBP) parengto rizikos vertinimo Lietuvos biokuro gamintojams pristatymas“. Jūsų išsakytos pastabos dėl atlikto Lietuvos rizikos vertinimo buvo labai naudingos ir konstruktyvios. Todėl, kaip jau informavome seminaro metu, siunčiame Jums trumpą lentelę, kurioje maloniai prašome Jūsų dar kartą glaustai nurodyti argumentus išsakytus seminaro metu dėl trijų rodiklių.

Prašome Jūsų pateikti pastabas iki **2015 m. sausio 9 d.** Esant klausimams, prašome nedvejodami kreiptis į mane.

Pagarbiai,

Gerimantas Gaigalas  
Certification manager/Sertifikavimo vadybininkas  
UAB "NEPCon LT"

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