

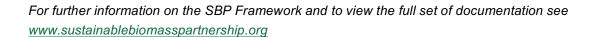
# NEPCon Evaluation of Warmeston OÜ Jarvere Compliance with the SBP Framework: Public Summary Report

www.sustainablebiomasspartnership.org





# Completed in accordance with the CB Public Summary Report Template Version 1.0



Document history

Version 1.0: published 26 March 2015

© Copyright The Sustainable Biomass Partnership Limited 2015



# Contents

1	Overview	1
2	Scope of the evaluation and SBP certificate	2
3	Specific objective	4
4	SBP Standards utilised	5
4.1	SBP Standards utilised	5
4.2	SBP-endorsed Regional Risk Assessment	5
5	Description of Biomass Producer, Supply Base and Forest Management	6
5.1	Description of Biomass Producer	6
5.2	Description of Biomass Producer's Supply Base	6
5.3	Detailed description of Supply Base	7
5.4	Chain of Custody system	14
6	Evaluation process	15
6.1	Timing of evaluation activities	15
6.2	Description of evaluation activities	15
6.3	Process for consultation with stakeholders	15
7	Results	16
7.1	Main strengths and weaknesses	16
7.2	Rigour of Supply Base Evaluation	16
7.3	Compilation of data on Greenhouse Gas emissions	16
7.4	Competency of involved personnel	16
7.5	Stakeholder feedback	16
7.6	Preconditions	17
8	Review of Biomass Producer's Risk Assessments	18
9	Review of Biomass Producer's mitigation measures	19
10	Non-conformities and observations	20
11	Certification decision	24
12	Surveillance updates	25
13	Evaluation details	26



# 1 Overview

CB Name and contact: NEPCon OÜ. Filosoofi 31, 51009 Tartu, Estonia

Primary contact for SBP: Ondrej Tarabus, SBP Program Manager

Report completion date: 07/Jan/2016

Report authors: Asko Lust, Lauri Kärmas

Certificate Holder: Warmeston OÜ. Järvere Küla, Sõmerpalu vald, Võrumaa 66629, Estonia

Producer contact for SBP: Viljo Aros, quality- and environmental manager

Certified Supply Base: Estonia, Latvia, Lithuania, Finland and Sweden

SBP Certificate Code: SBP-01-09

Date of certificate issue: 03/Mar/2016

Date of certificate expiry: 02/Mar/2021

In	Indicate where the current audit fits within the certification cycle			
Assessment	First Surveillance Audit	Second Surveillance Audit	Third Surveillance Audit	Fourth Surveillance Audit
Х				



# 2 Scope of the evaluation and SBP certificate

Scope of this evaluation is based on SBP standards 2; 4; and 5. Organization holds valid FSC COC certificate TT-COC-005268, covering both FSC transfer and FSC credit system. Credit system is the main control system used and is implemented when FSC certified and FSC Contolled Wood inputs are used. Controlled wood verification system for round wood originating from Estonia is also included into the FSC certification scope of the company. FSC transfer system is exclusively used only to segregate uncontrolled materials and PEFC materials, in case such are received.

Wood pellets might be produced from roundwood, sawdust, chips or wood shavings. Other types of feedstock: chips from forest residues, sawmill residues and bark, that are used in the drier. Inputs that are used for pellet production and inputs for the drier go through the same control system upon receipt. Company is sourcing feedstock from logging companies and from primary and secondary producers.

All inputs for SBP-Compliant biomass production are FSC or PEFC certified and FSC or PEFC controlled. There is a FSC transfer system in place to segregate non-certified material for drier in case such materials need to be used. This non-certified material is not used as input for SBP product groups or used in drier for SBP production. Since company is not holding PEFC certificate, material received only with PEFC claim is also segregated with FSC transfer system. Company has not used PEFC inputs so far, but is aware that it can be used in SBP system when segregated from FSC material.

All incoming wood materials are weighted by weighbridge or measured by log receiver in case of logs, and measurement data is recorded.

SBE was found not required in the scope of the certificate since primary feedstock is received as SBP-Compliant or Controlled feedstock, secondary and tertiary feedstock is received only with FSC claims

Wood pellets are sold based on DAP, FOB and CIF incoterms conditions. Sale can be made through Riga, Pärnu, Muuga, Bekkeri or Kunda ports.

Scope Item	Check all that apply to the Certificate Scope		Change in Scope (N/A for Assessments)
Approved Standards:	SBP Standard #2 V1.0 SBP Standard http://www.sustainablebiomasspar		
Primary Activity:	Pellet producer		
Input Material Categories:	☑ SBP-Compliant Primary       ☑ SBP-Compliant Secondary         Feedstock       Feedstock         ☑ Controlled Feedstock       ☐ SBP non-Compliant Feedstock		



	⊠ SBP-Compliant Tertiary biomass		<ul><li>☑ Pre-consumer Tertiary Feedstock</li><li>☐ Post-consumer Tertiary Feedstock</li><li>☐ SBP-approved Recycled Claim</li></ul>				
Chain of custody	⊠ FSC	□Р	EFC	SFI		□ GGL	
system implemented:			Percenta	age		Credit	
Use of SBP claim:	claim: Yes			□ No			
SBE Verification		only	Sources v		inspecified/		
	New districts approved for SBP-Co			ompliant inputs	s:		
Sub-scopes	-						
Specify SBP Product Groups added or removed:							
Comments:							



# 3 Specific objective

The specific objective of this evaluation was to confirm that the Biomass Producer's management system is capable of ensuring that all requirements of specified SBP Standards are implemented across the entire scope of certification.

The scope of the evaluation covered:

- Review of the BP's management procedures;
- Review of the production processes, production site visit;
- Review of FSC system control points, analysis of the existing FSC CoC system;
- Interviews with responsible staff;
- Review of the records, calculations and conversion coefficients; and
- GHG data collection analysis.



# 4 SBP Standards utilised

# 4.1 SBP Standards utilised

Verification of SBP-compliant Feedstock, SBP Standard 2, Version 1.0, March 2015

Chain of Custody, SBP Standard 4, Version 1.0, March 2015

Collection and Communication of Data, SBP Standard 5, Version 1.0, March 2015

http://www.sustainablebiomasspartnership.org/documents

# 4.2 SBP-endorsed Regional Risk Assessment

N/A



# 5 Description of Biomass Producer, Supply Base and Forest Management

### 5.1 Description of Biomass Producer

Warmeston OÜ has a pellet factory in Järvere that was opened in the winter of 2014. Planned production capacity of the factory is 110,000 tons of bulk wood pellets per year. Warmeston OÜ produces mainly 6mm premium pellets packed in 15kg packages and big bags, but can also load pellets on ships, bulk vehicles or containers, if required. Company plans to sell material to European union and Wood pellets are sold based on DAP, FOB and CIF incoterms conditions.

Warmeston purchases only following raw materials to be used in pellet production: FSC certified Primary feedstock, PEFC certified primary feedstock, FSC Controlled secondary feedstock, PEFC controlled secondary feedstock.

More detailed description is provided in SBR.

# 5.2 Description of Biomass Producer's Supply Base

Warmeston OÜ sources all its raw materials for pellet production through various suppliers from Estonia. The suppliers include forest harvesting companies, sawmills, planing mills, secondary producers and traders. According to the EUTR Regulation No. 995/2010 Warmeston OÜ acts as "trader" and not as "operator" as the feedstock is purchased from other organizations within EU. However the supply base may extend beyond the borders of Estonia as some of the suppliers may source their raw material partially from the neighbouring countries. As such Warmeston defines its supply base as the countries and regions in the following list to cover all current and potential future suppliers:

- Estonia
- Latvia
- Lithuania
- Finland
- Sweden

All primary feedstock sourced outside Estonia reaches Warmeston as secondary feedstock and originates from FSC or PEFC certified Forest Management or Chain of Custody schemes. BP is also buying tertiary feedstock from secondary production (sawdust and shavings) but this is all purchased with FSC claims.

Currently all feedstock used for pellet production is at least FSC controlled wood. An overview of the proportions of SBP feedstock product groups received during the last 12 months (including the period prior FSC certification) is presented in the table below:



Table 1. Overview of Warmeston SBP feedstock profile (1.12.2015-30.11.2015)

Feedstock product	Estimated	Indicative number	Species mix
groups	Proportion <sup>1</sup>	of suppliers	
Controlled Feedstock	2%	1	Alnus spp: Alnus glutinosa;
(FSC), (Primary)			Alnus incana (L.) Moench;
			Betula spp: Betula Pendula,
			Betula verrucosa; Picea abies;
			Pinus sylvestris; Populus spp:
			Populus tremula;
Controlled Feedstock	50	11	Alnus spp: Alnus glutinosa;
(FSC), (Secondary)			Alnus incana (L.) Moench;
			Betula spp: Betula Pendula,
			Betula verrucosa; Picea abies;
			Pinus sylvestris; Populus spp:
			Populus tremula;
SBP-compliant Primary	0%	0	Alnus spp: Alnus glutinosa;
Feedstock (FSC),			Alnus incana (L.) Moench;
			Betula spp: Betula Pendula,
			Betula verrucosa; Picea abies;
			Pinus sylvestris; Populus spp:
			Populus tremula;
SBP-compliant	7%	3	Alnus spp: Alnus glutinosa;
Secondary Feedstock			Alnus incana (L.) Moench;
(FSC),			Betula spp: Betula Pendula,
			Betula verrucosa; Picea abies;
			Pinus sylvestris; Populus spp:
			Populus tremula;
SBP non-compliant	41%	27	Alnus spp: Alnus glutinosa;
Feedstock			Alnus incana (L.) Moench;
			Betula spp: Betula Pendula,
			Betula verrucosa; Picea abies;

More detailed description is provided in SBR (http://www.warmeston.ee/doc45wRz6dhk/Jarvere SBR Eng.pdf).

# 5.3 Detailed description of Supply Base

### Estonia:

Estonia is a member of the European Union since 2004. The Estonian legislation is in compliance with the EU's legislative framework and directives. National legislative acts make references to the international framework. All legislation is drawn up within a democratic system, subject to free comment by all stakeholders<sup>1</sup>. The Estonian legislation provides strict outlines in respect to the usage of forestry land and the Estonian Forestry Development Plan 2020<sup>2</sup> has clear objectives and strategies in place to ensure the forestland is protected up to the standards of sustainable forest management techniques. The Ministry of the Environment coordinates the fulfilment of state duties in forestry. The implementation of environmental policies and its supervision are carried out by two separate entities operating under its governance. The Estonian Environmental Board monitors all of the work

<sup>&</sup>lt;sup>1</sup> http://europa.eu/about-eu/countries/member-countries/estonia/index en.htm

Original title: "Eesti metsanduse arengukava aastani 2020"; approved by Estonians parlament decision nr 909 OE 15.February 2011.a http://www.envir.ee/sites/default/files/elfinder/article\_files/mak2020vastuvoetud.pdf



carried out in Estonia's forests whereas the Environmental Inspectorate exercises supervision in all areas of environmental protection.

The forest is defined in the Forest Act. There are three main forest categories are described in this legislation: commercial forest, protection forest and protected forests. According to the ownership, forests are also divided into private forests, municipality forests and state owned forests. The state owned forest represent approximately 40% of the total forest area<sup>3</sup> and is certified according to FSC and PEFC forest management and chain of custody standard in which the indicators related to forest management planning, maps and availability of forest inventory records are being constantly evaluated and addressed<sup>4</sup>. The state forest is managed by State Forest Management Centre (RMK) which is a profit-making state agency founded on the basis of the Forest Act and its main duty lies in a sustainable and efficient management of state forest.

Currently more than 2 230 000 ha, equal to 51% of the Estonian land territory, is covered by forest as indicated in **Error! Reference source not found.** and the share of forest land is growing. According to FAO data, during 2000 - 2005, average annual change in the forest cover was +0.4 %<sup>5</sup>. Forestry Development Plan 2012-2020 and Yearbook Forest 2013, that gives annual reports and facts about the forest in Estonia, state that during last decade the cutting rate in Estonian forests is from 7 to 11 mill m³ per year<sup>6</sup>. The amount is in line with sustainable development principle when the cutting rate doesn't exceeds the annual increment and gives the potential to meet the long-term the economic, social and environmental needs. According to the Forestry Development Plan 2012-2020 the sustainable cutting rate is 12-15 mil ha per year.

For logging in any type of forest, it is required that a valid forest inventory or forest management plan, along with a felling permit issued by the Environmental Board, is available. All issued felling permits and forest inventory data is available in the public forest registry online database<sup>7</sup>.

Area of protected forests accounts to 25.3% of the total forest area whereas 10% is considered to be under strict protection. The majority of protected forests is located on state property. The main regulation governing the preservation of biodiversity and the sustainable use of natural resources is the Nature Conservation Act<sup>8</sup>. Estonia has signed the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in 1992<sup>9</sup> and joined the International Union for Conservation of Nature (IUCN) in 2007<sup>10</sup>. There are no CITES or IUCN protected tree species naturally growing in Estonia.

According to the Forestry Yearbook 2013 the wood, paper and furniture industry (503.5 million euro) contributed 21.6% to the total sector providing 3.3% of the total value added. Forestry accounted for 1.6% of the value added.

In Estonia, it is permitted to access natural and cultural landscapes on foot, by bicycle, skis, boat or on horseback. Unmarked and unrestricted private property may be accessed any time and pick berries, mushrooms, medicinal

<sup>&</sup>lt;sup>3</sup> http://www.rmk.ee/organisation/operating-areas

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

<sup>&</sup>lt;sup>5</sup> http://www.fao.org/forestry/country/32185/en/est/

<sup>&</sup>lt;sup>6</sup> Yearbook Forest 2013 <a href="http://www.keskkonnainfo.ee/failid/Mets\_2013.pdf">http://www.keskkonnainfo.ee/failid/Mets\_2013.pdf</a> (all key figures, graphs and tables are bilingual)

<sup>&</sup>lt;sup>7</sup> http://register.metsad.ee/avalik/

https://www.riigiteataja.ee/en/eli/517062015004/consolide

<sup>9</sup> http://www.envir.ee/et/cites

<sup>10</sup> http://www.envir.ee/et/iucn



plants, fallen or dried branches, unless the owner forbids it. On unmarked and unrestricted private property camping is allowed for 24 hours. RMK creates exercising and recreational opportunities in nature and in recreational and protection zones and provides education about the natural environment which are free to access.<sup>11</sup>

### Latvia:

Latvia is a parliamentary republic that joined the EU in 2004. In Latvia, forests cover area of 3 056 578 hectares. According to the data of the State Forest Service (concerning the surveyed area allocated to management activities regulated by the Forest Law), woodenness amounts to 51.8 % (ratio of the 3 347 409 hectares covered by forest to the entire territory of the country). The Latvian State owns 1 495 616 ha of forest (48.97% of the total forest area), while the other 1 560 961 ha (51.68 % of the total forest area) belong to other owners. The area covered by forest is increasing. The expansion happens both naturally and by afforestation of infertile land unsuitable for agriculture. Within the last decade, the timber production in Latvia has fluctuated between 9 and 13 million cubic metres.

Distribution of forests by the dominant species:

- pine 34.3 %;
- spruce 18.0 %;
- birch 30.8 %;
- black alder & grey alder 10.0 %; 4
- aspen 5.4 %

The field of forestry In Latvia is supervised by the Ministry of Agriculture, which in cooperation with stakeholders of the sphere develops forest policy, development strategy of the field, as well as drafts of legislative acts concerning forest management, use of forest resources, nature protection and hunting

Implementation of requirements of the national law and regulations issued by the Cabinet of Ministers notwithstanding the type of tenure is carried out by the State Forest Service under the Ministry of Agriculture

(Source: www.vmd.gov.lv).

Management of the state-owned forests is performed by the public limited company Latvijas Valsts Meži, established in 1999. The enterprise ensures implementation of the best interests of the state by preserving value of the forest and increasing the share of forest in the national economy. The share of forestry, wood-working industry and furniture production amounted to 6 % GDP in 2012, while export yielded 1.7 billion euro (17 % of the total amount).

(www.lvm.lv).

For the sake of conservation of natural values, a total number of 674 protected areas have been established. Part of the areas have been included in the European network of protected areas Natura 2000. Most of the protected

<sup>11</sup> https://www.eesti.ee/eng/topics/citizen/keskkond\_loodus/maa/metsandus\_1



areas are state-owned. In order to protect highly endangered species and biotopes located without the designated protected areas, if a functional zone does not provide that, microreserves are established. According to data of the State Forest Service (2015), the total area of micro reserves is 40 595 ha. Identification and protection planning of biologically valuable forest stands is carried out continuously. On the other hand, for preservation of biological diversity during forest management activities, general nature protection requirements binding to all forest managers have been developed. They stipulate that at felling selected old and large trees, dead wood, undergrowth trees and shrubs, land cover around micro-depressions are to be preserved, thus providing habitat for many organisms. Latvia has been a signatory of the CITES Convention since 1997. CITES requirements are respected in forest management, but there are no CITES tree species naturally growing in Latvia.

Areas where recreation is one of the main forest management objectives add up to 8 % of the total forest area or 293 000 ha (2012). Observation towers, educational trails, natural objects of culture history value, picnic venues: they are just a few of recreational infrastructure objects available to everyone free of charge. Special attention is devoted to creation of such areas in state-owned forests. Recreational forest areas include national parks (excluding strictly protected areas), nature parks, protected landscape areas, protected dendrological objects, protected geological and geomorphologic objects, nature parks of local significance, the Baltic Sea dune protection zone, protective zones around cities and towns, forests within administrative territory of cities and towns. Management and governance of specially protected natural areas in Latvia is co-ordinated by the Nature Conservation Agency under the Ministry for Environmental Protection and Regional Development.

All forest area of Latvijas valsts meži as well as some part of forests in private and other ownership are FSC and PEFC certified. From all totally forest area 3 056 578 ha is approximately 1.4 million ha of Latvian forest are certified according to FSC and PEFC certification scheme. Both the FSC and PEFC systems have found their way into Latvia.

### Lithuania

Lithuania is a parliamentary republic that joined the EU in 2004. Forested land consists of about 28 percent, with 2,17 million ha, while land classified as forest corresponds to about 30 percent of the total land area. The southeastern part of the country is most heavily forested, and here forests cover about 45 percent of the land. The total land area under the state Forest Enterprises is divided into forest and non-forest land. Forest land is divided into forested and non-forested land. The total value added in the forest sector (including manufacture of furniture) reached LTL 4.9 billion in 2013 and was 10% higher than in 2012.

Forest land is divided into four protection classes: reserves (2 %); ecological (5.8 %): protected (14.9 %); and commercial (77.3 %). In reserves all types of cuttings are prohibited. In national parks, clear cuttings are prohibited while thinnings and sanitary cuttings are allowed. Clear cutting is permitted, however, with certain restrictions, in protected forests; and thinnings as well. In commercial forests, there are almost no restrictions as to harvesting methods.

Lithuania has been a signatory of the CITES Convention since 2001. CITES requirements are respected in forest management. Lithuania is situated within the so-called mixed forest belt with a high percentage of broadleaves and mixed conifer-broadleaved stands. Most of the forests - especially spruce and birch - often grow in mixed stands. The dominant forest composition is the following:

Scots pine - 37.6%,



- spruce 24.0%,
- birch 19.5%.
- alder 11.2%,
- Ash 2.7%;
- Aspen 2.6%,
- Oak 1.8%,

There are no CITES tree species naturally growing in Lithuania.

To secure and maintain SFM both state and private forests are monitored and inspected by the Lithuanian State Forest Department, which also develops the main forestry management rules. Before commercial activities in the forests can commence, the State Forest Department requires a long-term forest management plan for every forest unit and owner. After acceptance of the plan, the State Forest Department issues a Harvesting License for separate sites. The Harvesting Licence determines what kind of forest felling system is allowed and which species and in what amount can be harvested in the area. It also determines the forest regeneration method at each harvesting site. The Harvesting Licence (licence number) is the main document for suppliers to track the supply chain and secure sustainable log purchases.

Total annual growth comes to 11 900 000 m³ and current harvest has reached some 3.0 million m³ u.b. per year. The consumption of industrial wood in the domestic forest industry, including export of industrial wood, is estimated to be less than 2.0 million m³. The remainder is used for fuel or stored in the forests, with a deteriorating quality as a result. The potential future annual cut is calculated at 5.2 million m³, of which 2.4 million m³ is made up of sawn timber and the remaining 2.8 million m³ of small dimension wood for pulp or board production, or for fuel. The figures refer to the nearest 10-year period. Thereafter a successive increase should be possible if more intensive and efficient forest management systems are introduced.

The total value added in the forest sector (including manufacture of furniture) reached EUR 1.2 billion in 2011 and was 25% higher than in 2010. Its share in the total national value added has increased from 3.7% (2010) to 4.2% (2011). The biggest share (EUR 520 million) of the value added in the sector was generated by the furniture industry.

Certification of all state forests in Lithuania is done according to FSC (Forest Stewardship Council) certificate.

(Source: http://www.fao.org/docrep/w3722e/w3722e22.htm)

### Finland

Finland is a parliamentary republic that is a member of the EU since 1995.

Forests cover 75 percent of Finland's land area. The total volume of timber in Finnish forests is 2,306 million cubic metres. Almost half of the volume of the timber stock consists of pine (*Pinus sylvestris*). The other most



common species are spruce (Picea abies) downy birch (Betula pubescens) and silver birch (Betula pendula). These species make for 97 percent of total timber volume in Finland. 12

The Forest Act regulates the felling of timber in Finland. Regional Forestry Centres control the implementation of the forestry legislation and accept forest use declarations in which forest owners inform about the stand characteristics, intended measures, regeneration and ecological concerns on the site before the felling can take place. Regional Environment Centres control the implementation of Nature Conservation Act. The Finland's National Forest Programme also states the importance of legal wood and lists measures to promote sustainable wood and to control illegal logging both nationally and internationally. 13

Private forest owners (mostly families) own the majority (60 %) of Finnish forests. The owner of the forest sells the timber which means that the obtaining logging authorisation through bribes does not exist in Finland. Owner needs to get acceptance for forest use declaration from regional forest centres. The state owns 26 percent of the Finnish forests, private industries, such as forest industry companies nine and other bodies five percent. The state forests are mainly situated in the north of Finland, and 45 percent of them are under strict protection. State lands are managed by Metsähallitus.

Certification is voluntary for the forest owner however around 95% of Finnish commercial forests have been certified under the PEFC certification system (Programme for Endorsement of Forest Certification). Certification criteria are stricter than decrees or legislation, which means that in practise, certification determines the standard of silviculture in Finland. Some Finnish forests have also been certified under the Forest Stewardship Council (FSC). The area of these forests is slightly below 2 percent of Finnish forests.

According to a report by UNECE the amount of illegal logging in Finland is negligible. An extensive national forest inventory, national forest programme and regional forest programmes, widely spread individual forest management plans and large share of private non-industrial ownership of forests contribute to almost nonexistence of markets for illegal timber and negligible amount of illegal logging in Finland.

Finland joined CITES in 1976. Nowadays the national legislation for the implementation of CITES and relating EU regulations is the Nature Conservation Act (1096/1996), which came into force in the 1st of January 1997. IUCN National Committee of Finland was approved by IUCN Council in 1999.

The forest sector is one of key supporters of Finland's economy. In 2011 it employed directly about 70,000 people in Finland, which was 2.8 percent of all employees. One fifth of Finland's export income comes from forest industries. More than 60 percent of the value added generated by the forest industries came from pulp and paper industries and the rest from wood products industries in 2011. Regionally, the importance of the forest sector is largest in southeastern corner of Finland and in Etelä-Savo and Central Finland regions, where the sector produces some ten percent of the regional GDP.

Similar to Estonia Finland has a relatively rare concept of Everyman's rights (Jokamiehenoikeus) which gives everyone, Finns and other nationalities alike, the right to move freely outdoors. Picking berries and mushrooms is permitted even on privately owned land; thus free forest access provides, in addition to products for local or family consumption, income-earning opportunities for those who sell non-wood forest products. Everyman, s right has

http://fsc.force.com/servlet/servlet.FileDownload?file=00P3300000YU8ihEAD

<sup>12</sup> http://www.smy.fi/en/forest-fi/finnish-forests-resources/



traditionally been exercised with due concern for the environment and common courtesy to the landowner or those living in the vicinity.

A group considered as an indigenous people in Finland is the Sámi. Their rights have been secured in many laws e.g. the Constitution, the Sámi Parliament Act, the Act on the Finnish Forest and Park Service and the Act on Reindeer Husbandry. The Sámi Parliament is the supreme political body of the Sámi in Finland. The Sámi Parliament represents the Sámi in national and international connections, and it attends to the issues concerning Sámi language, culture, and their position as an indigenous people. The Sámi Parliament can make initiatives, proposals and statements to the authorities. The Sámi Parliament Act also states that the authorities have an obligation to negotiate with the Sámi Parliament for all important measures that concern the Sámi people. These include for example the use of state land and conservation areas.

### Sweden<sup>14</sup>

Sweden is a parliamentary constitutional monarchy that joined the EU in 1995.

The Swedish Forest Agency is the national authority responsible for matters relating to the forest. It strives to ensure that the nation's forests are managed in such a way as to yield an abundant and sustainable harvest while at the same time preserving biodiversity. The Agency also strives to increase awareness of the forest's significance, including its value for outdoor recreation. The Agency has offices throughout the country. Its most important tasks are to give advice on forest-related matters, supervise compliance with the Forest Act, provide services to the forest industry, support nature conservation efforts and conduct inventories.

Sweden has Europe's second biggest afforested area after Russia. Sweden's productive forests cover about 23 million hectares. However, if this area is calculated according to international forest land definitions, it is 27 million hectares. Ap Spruce and pine are by large the predominant species in Swedish forests. These two species count for more than 80% of the timber stock. In northern Sweden pine is the most common species, whereas spruce, mixed with some birch, dominates in southern Sweden.

Due to effective and far-sighted forest management the timber stock in Sweden has increased by more than 60% in the last one hundred years and it is now 3000 million m3. In recent years felled quantities have been between 85 and 90 million m<sup>3</sup>, whereas annual growth amounts approximately to 120 million m<sup>3</sup>.

The amount of protected forests in Sweden amounts to circa 1.9 million hectares. A great extent, about 90% of these forests are the kind of forests in which minor interventions are allowed. The share of strictly protected forests, where no human interventions are allowed is 0.3 % from the forest area. National parks, nature reserves and nature conservation areas cover an area of 4.2 million hectares, i.e. 10% of Sweden's land area. There are at least 220.000 hectares of protected forests which still in terms of forest growth are productive. In addition, there are about 12.000 hectares of protected habitat types and 25.000 hectares of wood land set aside and protected by environment conservation agreements. Large forest areas are also protected through forest owners' voluntary activities. Sweden signed the Convention on International Trade in Endangered Species of Wild Fauna and Flora in August 1974 and the convention entered into force in July 1975. Sweden has also established a IUCN National Committee.

http://www.nordicforestry.org/facts/Sweden.asp#En



Private forest owner families hold about 50% of Swedish forests, privately owned forestry companies about 25% and the State and other public owners have the remaining 25%. The ownership of forests in Sweden varies between regions. In Southern parts of the country forests are mainly owned by private persons whereas in Northern Sweden companies own more significant amounts of forests.

80% of the Swedish forest land is certified under either the FSC or under the PEFC certification scheme. FSC certified forests amount to 10.2 million hectares and PEFC certified to 7.5 million hectares. Of the total 7.5 million hectares certified under the PEFC scheme, 3 million hectares are family owned.

The forest products industry plays a major role in the Swedish economy, and accounts for between nine and 12 percent of Swedish industry's total employment, exports, sales and added value.

Similar to Estonia and Finland, Sweden everyone has the Right of Public Access to roam the Swedish countryside including walking, camping, climbing and picking flowers.

## 5.4 Chain of Custody system

Warmeston OÜ holds valid FSC CoC certificate since 3<sup>rd</sup> of February 2015, certificate code is TT-COC-005268/TT-CW-005268. FSC certificate also covers controlled wood verification program for Estonia. Warmeston is using FSC credit system and FSC transfer system for heating material (not certified). There are some uncertified leftovers for heating but these are kept physically separately and these are used for non-SBP production. BP does not plan to buy any additional uncertified material. Company has enforced procedures and system update that they will buy only FSC certified or FSC Controlled material (including heating material). The non-certified (FSC- or PEFC controlled) material in stock will be segregated from production of SBP compliant or SBP controlled material.

Their product groups for the FSC CoC certification include wood chips, sawdust, wood shavings, roundwood, wood pellets and fuel wood.



# 6 Evaluation process

### 6.1 Timing of evaluation activities

Assessment was carried out on 07.12.2015 and during 08-10.12.2015 all ports, where BP plans to store material, were visited (Pärnu, Bekkeri, Muuga and Kunda). BP might also use Riga harbour, but since supply clause is DAP (Delivered At Place), it was not visited. Place of delivery is Riga harbour, where buyer takes full responsibility of further transport of the biomass. Pellets are delivered from Järvere factory to Riga harbour by trucks. SBP pre-assessment was also carried out in the same factory on 17<sup>th</sup> of November 2015.

# 6.2 Description of evaluation activities

Assessment was carried out as an onsite audit in Warmeston OÜ Järvere production site. Later on all ports added to scope were visited. Review of procedures and communication to client overall responsible was done prior onsite audit.

During the onsite audit all applicable indicators of applicable SBP standards were evaluated. All stages of the production were visited started from reception and ending with material dispatching. All responsible staff was interviewed during the audit. Auditors also reviewed all of the proof documentation for GHG data provided by BP.

Closing meeting was held on 10.12.2015 after the visit of Kunda port.

# 6.3 Process for consultation with stakeholders

Stakeholder consultation was carried out by BP.

BP conducted stakeholder consultation process by e-mail message to local municipalities, state institutions and authorities. In addition, BP made inquiries to government bodies to review if their suppliers have any recent violations of law related to their business. Official replies to the inquiries were received on October 12, 2015. None of the suppliers of BP had any violations of law during the past year according to the reply from Governmental bodies, therefore there was no further communications with them after receiving the replies.

CB conducted stakeholder consultation on November 6, 2015 in purpose to receive comments for the main SBP assessment, but no comments were received by the time of assessment. Stakeholder consultation included Warmeston OÜ Järvere site, Warmeston OÜ Purila site and Purutuli OÜ, since all companies have common ownership and assessments were planned to the same week.

CB-s stakeholder consultation was sent via Loodusaja mailing list (ca 1000 followers) and to local NGO-s. In addition, CB-s stakeholder notification was printed in Estonian newspaper "Maaleht" (ca 45 000 subscribers).



# 7 Results

## 7.1 Main strengths and weaknesses

Strenghts: SBP system procedures are very well compiled and implemented. Efficient online record keeping system is used for raw materials, production, products and materials/energy used.

Weaknesses: Big share of FSC Controlled Wood PEFC Controlled Sources material from secondary producers.

# 7.2 Rigour of Supply Base Evaluation

N/A

# 7.3 Compilation of data on Greenhouse Gas emissions

BP has a system to gather and record Greenhouse Gas emissions. During the audit, BP made detailed overview of the systems and databases to gather and record such data. Evidence was provided to auditors.

### 7.4 Competency of involved personnel

Auditor(s), roles	Qualifications
Asko Lust, lead	BSc in Forest Industry, MSc in forest management. Asko is working as
auditor	forest management and chain of custody auditor in NEPCon. He has
	passed SmartWood lead assessor training course in Forest Management
	and Chain of Custody certification. He has been participating in CoC
	audits and has an earlier work experience from Board of Environment.
	Asko has participated in training provided by SBP and has passed SBP
	exam. Asko has participated in SBP witness audit and couple of SBP pre-
	assessments in Estonia.
Lauri Kärmas, auditor	MSc in Industrial Ecology. Lauri has been working in NEPCon since
in training	autumn 2012, earlier work experience in wooden houses production field.
	He has successfully passed Rainforest Alliance lead auditor training
	course in Forest Management and Chain of Custody certification. He is
	working as Forest Management and Chain of Custody auditor. Lauri Has
	participated in training provided by SBP and passed SBP exam.

# 7.5 Stakeholder feedback

Only stakeholder comments received were official replies from state authorities about their suppliers. It turned out from these answers that no active violations were discovered among suppliers.



# 7.6 Preconditions

No preconditions to this certification were identified at the time of the assessment.



# 8 Review of Biomass Producer's Risk Assessments

N/A



# 9 Review of Biomass Producer's mitigation measures

N/A



# 10 Non-conformities and observations

NCR: 01/15	NC Classification: minor		
Standard & Requirement:	SBP Standard # 2 requirement 5		
Report Section:	eport Section: Appendix B p 1.1		
Description of Non-conformanc	e and Related Evidence:		
BP has composed a SBR, where a	all areas where feedstock is purchased, are listed	and described in	
detail. Supply Base Report is eval	uated each year by BP.		
Countries where the material is or	iginating are Estonia, Latvia, Lithuania, Sweden, F	inland.	
BP has asked all of their suppliers to fill questionnaires about the origin of supplied material. Questionnaires are to be filled in by all suppliers before new contracts are signed. Additionally all suppliers need to sign an annex of the contract (Tarnija käitumiskoodeks) where agree to provide BP the information about origin of material, GHG and any changes in COC if these changes occur. It is also described in the supplier codecs, that in case supplier fails to fullfill the requirements set by the supplier codecs intentionally or by mistake several times, then BP has a right to end contract with the supplier. These contract together with connected documents mentioned above are revied at least annually (in case Roundwood once a quarter). It turned out that BP is not conducting any additional on-site controls to determine if the information provided by the supplier is correct.  Since the proof of the origin of supplied material is based on contractual level, signed by suppliers but not controlled on-site, auditors decided to raise a minor NCR.			
Corrective action request:  Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.  Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance.			
Timeline for Conformance:	Prior to (re)certification		
	By the next annual surveillance audit		
Evidence Provided by PENDING Organisation:			
Findings for Evaluation of PENDING			
Evidence:			
NCR Status:			
Is the non-conformity likely to impact upon the integrity of the affected SBP-			
cortified products and the gradibility	certified products and the credibility of the SBP trademarks?		



NCR: 02/15	NC Classification: minor	
Standard & Requirement: SBP Standard # 2 requirement 6.2		
Report Section:	Appendix B p 1.3	
Description of New conformance and Deleted Evidence:		

### **Description of Non-conformance and Related Evidence:**

BP collects the information about the place of harvesting and primary wood processor upon SBP-compliant Secondary Feedstock is received. All suppliers, including FSC certified, are signing an annex to contract (Tarnija käitumiskoodeks) where agree to provide BP the information about origin of material, GHG and any changes in COC if these changes occur. All suppliers also fill in the material origin questionnaire before the contract is signed. BP has made these requests before SBP assessment. BP has already made changes in their suppliers list according to the questionaries' received, these were presented to auditors during the audit. All secondary input comes with FSC claim. Company is also aware of the option to use PEFC certified material inputs, but will segregate this material from FSC material under FSC transfer system in such case. PEFC inputs have not been used so far.

All inputs undergoing company's own controlled wood verification program are always received together with origin information, including felling permit.

Some suppliers are left out from the supplier list due to the origin from Russia.

The contracts for secondary inputs are reviewed once a year and contracts for roundwood once a quarter.

This is considered to be enough by BP to evaluate the primary wood processor and origin of secondary material, this is also supported by the low corruption level in country (CPI 69 http://www.transparency.org/cpi2014/results).

Same requirements are set to the material supplies for the drier - all material purchased for drier heating for SBP-compliant pellet production complies with FSC Controlled Wood requirements.

It turned out that BP is not conducting any additional on-site controls to determine if the information provided by the suppliers is correct.

Since the proof of the origin of supplied material is based on contractual level and signed by suppliers, auditors decided to raise a minor NCR.

Corrective action request:	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.  Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
Timeline for Conformance:	
	By the next annual surveillance audit
Evidence Provided by	PENDING
Organisation:	
Findings for Evaluation of	PENDING
Evidence:	
NCR Status:	OPEN



Is the non-conformity likely to impact upon the integrity of the affected SBP-	Yes 🗌
certified products and the credibility of the SBP trademarks?	No 🖂

NCR: 03/15	NC Classification: minor		
	SBP Standard # 2 requirement 7.4 (# Instruction Note 2C; 4.1)		
Standard & Requirement:	SDP Standard # 2 requirement 7.4 (# instruction Note 20, 4.1)		
Report Section:	Appendix B p 2.8		
Description of Non-conformance			
•	eport (SBR), that is concise and completed on the	latest available	
	ment. However written SBR is lacking more detail		
the SBE was determined not to be	_	ca sammary writy	
	·		
	ng the on-site evaluation with the general responsi	•	
	scope of the certification process. Company is pu	rchasing SBP-	
Compliant and SBP-Controlled pri	mary, secondary and tertiary feedstock.		
Auditors decided to raise a minor	NCR.		
Corrective action request:	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.		
	Note: Effective corrective actions focus on addressing the		
	specific occurrence described in evidence above, as well as the		
	root cause to eliminate and prevent recurrence c conformance.	or the non-	
Timeline for Conformance:	comormance.		
Timeline for Comormance.	By the next annual surveillance audit		
Evidence Provided by	PENDING		
Organisation:	FLINDING		
Findings for Evaluation of			
Evidence:			
NCR Status:			
Is the non-conformity likely to impact upon the integrity of the affected SBP-			
certified products and the credibility of the SBP trademarks?			



OBS: 01/15	Standard & Requirement:	SBP Standard 2, requirement 19.1
	Report Section	Appendix B p 12.1
Description of findings leading to observation:	The content of Supply Base Reporthe supply base, reviewed by sen and therefore may be considered. The SBR includes links to source verification.  BP has not sent the SBR to indepart auditors decided to raise an obse	ior management and by certifier as credible. s of information and means of endent peer reviewer and therefore
Observation:	It is recommended for BP to send	the SBR to peer reviewer.

OBS: 02/15	Standard & Requirement:	SBP Standard 5A, requirement 8.1
	Report Section	Appendix D p 9.1
Description of findings	BP has supply base report with all the data about material they are	
leading to observation:	using, the only information that was not added to batch specific data	
	was about the stump wood since company does not use any stump wood. However the information that company is not using stump wood must be added to batch specific data. Auditors decided to raise a observation.	
Observation:	It is recommended for BP to add i	
	that they are not using any stump	wood.



# 11Certification decision

Based o	n Organisation's conformance with SBP requirements, the auditor makes the following	
recommendation:		
$\boxtimes$	Certification approved:	
	Upon acceptance of NCR-s:	
	Certification not approved:	
Based on auditor's recommendation and NEPCon quality review following certification		
decision is taken:		
NEPCon certification decision:		
The Biomass Producer has been certified by NEPCon as meeting the requirements of the specified		
SBP Standards. The expiration of the certificate will be 5 years after the issuance of the certificate.		
Certification decision by:		
Date of decision:		



# 12 Surveillance updates

N/A



# 13 Evaluation details

Primary Responsible Person: (Responsible for control system at site(s))	Viljo Aros, quality- and environmetal manager	
Auditor(s):	Asko Lust, lead auditor  Lauri Kärmas, auditor in training	
People Interviewed, Titles:	Viljo Aros, quality- and environmental manager Kuido Kuntro, Warmeston OÜ member of the board Siim Liblik, Warmeston OÜ member of the board Risto Koppel, Warmeston OÜ Järvere plant manager Ly Kivila, manager assistant, responsible for the control of purchase documents Ove Toomla, wheel-loader operator Külli Laos, sales assistant, responsible for issuing sales documents Heitti Pirnpuu, senior operator	
Brief Overview of Audit Process for this Location:	Same as in 6.2 above	
Comments:		