

# Supply Base Report: Graanul Pellets SIA (Incukalns)

www.sustainablebiomasspartnership.org





# Completed in accordance with the Supply Base Report Template Version 1.2

For further information on the SBP Framework and to view the full set of documentation see <a href="https://www.sustainablebiomasspartnership.org">www.sustainablebiomasspartnership.org</a>

Document history

Version 1.0: published 26 March 2015

Version 1.1 published 22 February 2016

Version 1.2 published 23 June 2016

© Copyright The Sustainable Biomass Partnership Limited 2016



# Contents

1	Overview	1
2	Description of the Supply Base	2
2.1	General description	2
2.2	Actions taken to promote certification amongst feedstock supplier	13
2.3	Final harvest sampling programme	13
2.4	Flow diagram of feedstock inputs showing feedstock type	14
2.5	Quantification of the Supply Base	14
3	Requirement for a Supply Base Evaluation	16
4	Supply Base Evaluation	17
4.1	Scope	17
4.2	Justification	17
4.3	Results of Risk Assessment	18
4.4	Results of Supplier Verification Programme	18
4.5	Conclusion	18
5	Supply Base Evaluation Process	20
6	Stakeholder Consultation	21
6.1	Response to stakeholder comments	21
7	Overview of Initial Assessment of Risk	24
8	Supplier Verification Programme	26
8.1	Description of the Supplier Verification Programme	26
8.2	Site visits	26
8.3	Conclusions from the Supplier Verification Programme	27
9	Mitigation Measures	29
9.1	Mitigation measures	29
9.2	Monitoring and outcomes	30
10	Detailed Findings for Indicators	32
11	Review of Report	33
11.1	Peer review	33
11.2	Public or additional reviews	33
12	Approval of Report	34

# SBP Sustainable Riomass Partnershin

# Focusing on sustainable sourcing solutions

13	Updates	35
	Significant changes in the Supply Base	
13.2	Effectiveness of previous mitigation measures	35
13.3	New risk ratings and mitigation measures	35
13.4	Actual figures for feedstock over the previous 12 months	35
13.5	Projected figures for feedstock over the next 12 months	35



# 1 Overview

Producer name: SIA Graanul Pellets, production site Launkalne

Producer location: Planupes str., 34., Incukalns parish, Incukalns district, Latvia LV-2141,

Geographic position: 57.088826, 24.670441

Primary contact: Aleksandrs Zjatkovs (Executive director), telephone: +371 27889958,

email: aleksandrs.zjatkovs@graanulinvest.com

Company website: www.graanulinvest.com

Date report finalised: 12/Aug/2016

Close of last CB audit: 09/Jun/2016 Incukalns

Name of CB: NEPCon SIA

Translations from English: Yes

SBP Standard(s) used: Standart 1 version 1.0; Standard 2 version 1.0; Standard 4, version 1.0;

Standard 5 version 1.0; Standart 6 version 1.0

Weblink to Standard(s) used: http://www.sustainablebiomasspartnership.org/documents

SBP Endorsed Regional Risk Assessment: Estonia

http://www.sustainablebiomasspartnership.org/docs/SBP-endorsed-Regional-Risk-Assessment-for-Estonia.pdf

Weblink to SBE on Company website: <a href="www.graanulinvets.com">www.graanulinvets.com</a>

Indicate hov	Indicate how the current evaluation fits within the cycle of Supply Base Evaluations				
Main (Initial) Evaluation	First Surveillance	Second Surveillance	Third Surveillance	Fourth Surveillance	
X					



# 2 Description of the Supply Base

# 2.1 General description

SIA "Graanul Pellets" most of the raw materials as feedstock primary and secondary from feedstock originating from Latvian and Estonia, as well as a small part of the raw material, which is indirectly supply after wood processing as secondary feedstock from Lithuania and Belarus.

Controlled Feedstock, 80 %

SBP-compliant Primary Feedstock, 4%

SBP-compliant Secondary Feedstock, 5%

SBP-compliant Tertiary Feedstock, 10%

SBP non-compliant Feedstock 0%

Species: Picea abies (L.) H. Karst.); Pinus sylvestris (L.); Alnus glutinosa (L.) Gaertn.); Alnus incana (L.) Moench) Populus tremula (L.); Betula pendula (Roth; silver; Betula pubescens (Ehrh.)

#### LATVIA forest resources

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), forest Land 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. Private forest owners in Latvia amount to approximately 144 thousand.

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 (State Forest Services: vmd.gov.lv, 2015).

#### Forest land consists of:

- forests 3 056 578 ha (91.3%);
- marshes 175 111.8 ha (5.3%);
- glades (forest meadows) 35 446.7 ha (1.1%);
- flooded areas 18 453.2 ha (0,5%);
- objects of infrastructure 61 813.4 ha (1.8%).

State Forest Services: vmd.gov.lv, 2015.

#### Distribution of forests by the dominant species:

- pine 34.3 %;
- spruce 18.0 %;
- birch 30.8 %;
- black alder 3.0 %;
- grey alder 7.4 %:
- aspen 5.4 %;



- oak 0.3 %;
- ash 0.5 %:
- other species 0.3 %.

State Forest Services: vmd.gov.lv, 2015.

#### Share of species used in reforestation, by planting area (2014):

- pine 20 %;
- spruce 17 %;
- birch 28 %;
- grey alder 12 %;
- aspen 20 %;
- other species 3 %.

State Forest Services: vmd.gov.lv, 2015.

#### Timber production by types of cuts, by volume produced (2014):

- final cuts 81.00 %;
- thinning 12.57 %;
- sanitary clear-cuts 3.63 %;
- sanitary selective cuts 1.43 %;
- deforestation cuts 0.76 %;
- other types of cuts 0.06 %.

State Forest Services: vmd.gov.lv, 2015.

#### The field of forestry

In Latvia, the field of forestry 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 (<a href="www.zm.gov.lv">www.zm.gov.lv</a>). Implementation of requirements of the national law and regulations notwithstanding the type of tenure is carried out by the State Forest Service under the Ministry of Agriculture (State Forest Services: <a href="www.vmd.gov.lv">www.vmd.gov.lv</a>). Management of the state-owned forests is performed by the *Joint Stock Company "Latvia's State Forests"*, 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 (<a href="www.lvm.lv">www.lvm.lv</a>). Export yielded 1.978 billion euro (approx. 20 % of the total amount in 2014)..

Export flored from a simon data (approxi 20 % of the total amount in 20

#### **Biological diversity**

Historically, extensive use of forests as a source of profit began later than in many other European countries, therefore a greater biological diversity has been preserved in Latvia.

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 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, micro-reserves 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, underwood trees and shrubs, land cover around wet micro-lowlands (terrain 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, although there are no species included in the CITES lists in Latvia.

#### Forest and community

Areas where recreation is one of the main forest management objectives add up to 8 % of the total forest area or 293 000 ha (2012y). 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.

#### Certification

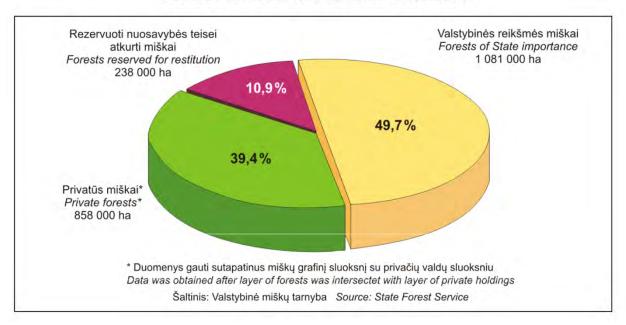
All forest area of Latvijas valsts meži as well as some part of forests in private and other ownership are FSC and PEFC certified. From all totally forest area 3 347 409ha is approximately 1,737 milj. ha of Latvian forest are certified according to FSC and PEFC certification scheme. Both the FSC and PEFC systems have found their way into Latvia.

#### LITHUANIA forest resources

Agricultural land covers more than 50 percent of Lithuania. Forested land consists of about 28 percent, with 2,18 million ha, while land classified as forest corresponds to about 30 percent of the total land area. The south-eastern 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 BY OWNERSHIP 01.01.2014



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, although there are no species included in the CITES lists in Lithuania.

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. Pine forest is the most common forest type, covering about 38 percent of the forest area. Spruce and birch account for about 24 and 20 percent respectively. Alder forests make up about I2 percent of the forest area, which is fairly high, and indicates the moisture quantity of the sites. Oak and ash can each be found on about 2 percent of the forest area. The area occupied by aspen stands is close to 3 percent.

The growing stock given as standing volume per hectare is on the average of I80 m<sup>3</sup> in Lithuania. In nature stands, the average growing stock in all Lithuanian forests is about 244 m<sup>3</sup> per hectare. Total annual growth comes to 11 900 000 m<sup>3</sup> and the mean timber increment has reached 6.3 m<sup>3</sup> per year and per hectare.

Current harvest has reached some 3.0 million m<sup>3</sup> 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 m<sup>3</sup>. 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 m<sup>3</sup>, of which 2.4 million m<sup>3</sup> is made up of sawn timber and the remaining 2.8 million m<sup>3</sup> 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.



Certification of all state forests in Lithuania is done according to the strictest certification in the world – the FSC (Forest Stewardship Council) certificate. The audit of this certificate testifies to the fact that Lithuanian state forests are managed especially well – following the principles of the requirements set to protection of and an increase in biological diversity.

(Resources: <a href="http://www.fao.org/docrep/w3722e/w3722e22.htm">http://www.fao.org/docrep/w3722e/w3722e22.htm</a>)

#### **BELARUS** forest resources

In Belarus forests cover area of 9,5 milj hectares. According to the data of the State Forest Ministry Woodenness amounts to  $39,3\,\%$ 

Forest industry input into IKP is 1,1%;

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 Belarus has fluctuated aprox., 11 million cubic metres (http://www.mlh.by, 2015.)

#### Forest land consists of:

#### Area (1000 hectares)

Forest	7,894
Other wooded land	914
Forest and other wooded land	8,808
Other land	11,94
Total land area	20,748
Inland water bodies	12
Total area of country	20,76

Source: http://www.mlh.by, 2015.

#### Distribution of forests by the dominant species:

- pine 50,4%;
- spruce 9,2%;
- birch 23,1%;
- black alder 3,3%;
- grey alder 3,3 %:
- aspen 2,1%;
- other species 3,3%.

Source: http://www.mlh.by, 2015.

Timber production by types of cuts, by volume produced (2013):



final cuts 34,5 %;

• thinning 45,79 %;

other types of cuts 19,62 %.

Source: http://www.mlh.by,

#### The field of forestry

Management of the state-owned forests is performed by different types of state organizations.

#### **Biological diversity**

Belarus has been a signatory of the CITES Convention since 1995. CITES requirements are respected in forest management, although there are no species included in the CITES lists in Belarus.

Forest regeneration is carried out annually over an area of 32,000 ha, including 81% of the forest planting planting and seeding and 19% by natural regeneration. <a href="http://belstat.gov.by/">http://belstat.gov.by/</a> (2015.y.)

There are 2 strictly protected Nation reserves and 4 National parks present in Belarus at the moment. Area of National reserves accounts 2,98 milj ha and area of National parks is 3,98 milj ha.

#### Forest and community

In 2014 in all kinds of felling there were harvested 12,5 million m3 marketable timber.

Foreign trade surplus made USD 104 million. 1.9 million cubic meter round timber and 191.8 thousand cubic meter sawn timber were sold abroad.

Forest products and services were exported to 25 states, including 95,3% to the near abroad and 4,7% to the remote countries. Among the main forest export directions are Poland (47,9% of the total export volume in value terms), Germany (11,4%), Lithuania (10%), Latvia (8,62%), the Netherlands (3,3%), Belgium (3,46%), Sweden (3,25%).

#### Certification

All forest area is certified by PEFC certification scheme. 8,1milj. ha (95 floristries) are certified according to PEFC.

FSC 6,8 milj. ha (81 forestry's) are certified according to FSC FM standards.

Both the FSC and PEFC systems have found their way into Belarus.

#### ESTONIA forest resources

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

http://www.envir.ee/sites/default/files/elfinder/article files/mak2020vastuvoetud.pdf

<sup>1</sup> http://europa.eu/about-eu/countries/member-countries/estonia/index\_en.htm

<sup>&</sup>lt;sup>2</sup> Original title: "Eesti metsanduse arengukava aastani 2020"; approved by Estonians parlament decision nr 909 OE 15.February 2011.a





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 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 represents 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 Figure 1 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 exceed 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.

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

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

http://www.fao.org/forestry/country/32185/en/est/

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



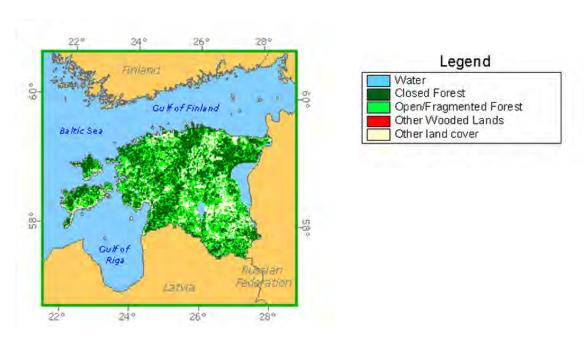


Figure 1. Forest cover of Estonia (FAO: http://www.fao.org/forestry/country/en/est/).

The distribution of growing stock by tree species in Estonia is shown in Figure 2.

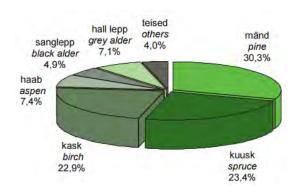


Figure 2. The distribution of growing stock by tree species (Yearbook Forest 2013).

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.

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

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

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

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





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 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>

#### NORWAY forest resources

#### Forest facts

About 38% of the surface area in Norway is covered by forest. The total forested area amounts to 12 million hectares, including more than 7 million hectares of productive forest. 15% of the productive forest has been estimated as non-economic operational areas due to difficult terrain and long distance transport, which means that economical forestry may only be operated in about 50% of the forested area. The most important species are Norway spruce (47%), Scots pine (33%) and birch (18%).

<u>From the forest area:</u> Privately owned forests 80 %; State and municipalities 12 % Industrial private 4 %; Local common land 4 %

#### Forest certification

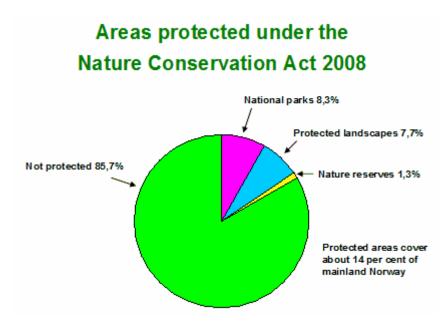
All productive forests in Norway are certified, i.e. 7.397.000 hectares. The number of certified forest owners is approximately 43.000 (private, municipalities, state).

\_

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



#### Forest protection



Areas protected under the Nature Conservation Act 2008

#### **Biodiversity**

Approximately 6.4% of mainland Norway has protected area status. In addition, 15,000 square km of Spitsbergen is designated as conservation area - national parks, nature reserves or other kinds of protected area cover 10-12% of the area of the remote islands.

The total number of species in Norway is estimated to be 45,000, of which approximately 33,000 are known and described. It exists information enough to estimate wether a species is threatened or not for only 10,000 species. Of these, 150 are threatened by extinction, 279 are deemed vulnerable, 800 are categorized as rare (the last number also includes species which are rare of natural causes, and not only because of human intervention). 359 are deemed species of special concern, 36 species are indeterminate, while 169 species are classified as insufficiently known.

Species "Red lists" can be used to point out the habitats containing an especially rich variety of endangered species. Red list species have often proved to be the red warning lights of nature to tell us that a biotope is threatened or something else is wrong in nature. The red lists also give us a picture of the condition of our flora and fauna, and may contribute to the efforts of securing and improve the ecosystem for these species. http://www.borealforest.org/world/world\_norway.htm

In the country, there are areas of endangered high conservation value forests. More specifically there are Global200 and IFL areas in the northern mountain regions.

Those regions identified by Conservation International as a Biodiversity Hotspot http://www.biodiversityhotspots.org/xp/hotspots/Pages/d efault.aspx Those forest, woodland, or mangrove ecoregions identified by World Wildlife Fund as a Global 200 Ecoregion and assessed by WWF as having a conservation status of endangered or critical. Those regions identified by the World

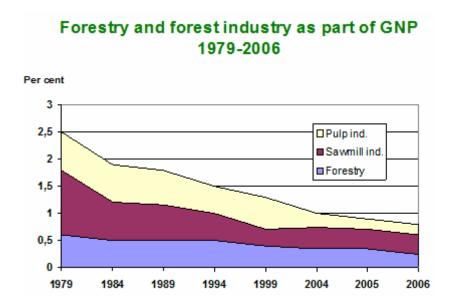


Resources Institute as a Frontier Forest Intact Forests Landscapes, as identified by Greenpeace (www.intactforests.org)

#### Forest sector in Norway's national economy

In 2006 forestry and the forest industries accounted for about 0.8% of the Gross National Product in Norway. Of the total employment of 2.443.000 persons in Norway approximately 40.000 people receive their income from forestry and from the forest industry. 6.700 persons (0.3%) are directly employed in forestry.

About 50 percent of the Norwegian round wood harvested is used by sawmills. There are 225 sawmills in Norway operating on an industrial scale.



Forestry and forest industry as part of the GNP 1979-2006

A lot of people use the forest for recreational activities, both traditional and modern, including walking, picking berries and mushrooms, hunting and fishing.

#### SWEDEN forest resources

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 m3, whereas annual growth amounts approximately to 120 million m3.

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.

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.

# 2.2 Actions taken to promote certification amongst feedstock supplier

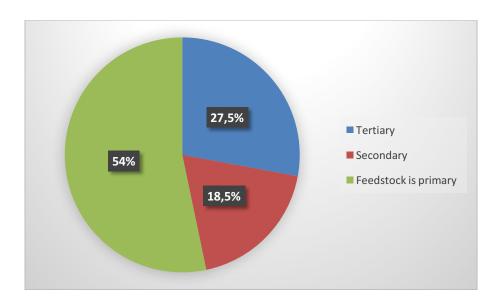
For the production of SBP pellets are mostly used FSC and PEFC certified supplier material (14%). The company policy is to give a preference to certified suppliers. Raw material (sawdust, consists of wood waste from main production of suppliers. Therefore, uncertified and new suppliers are invited to certify their base production and get benefit from residues. During preparation for SBP certification, the company has increased the share of FSC-certified raw materials from 5 to 20 %, and the management of the company has decided to increase procurement of *FSC certified* materials by more than 50 % between till December 2016

# 2.3 Final harvest sampling programme

The proportion of biomass quantity as primary raw material after final fellings is about 25-35% compared to quantity of other raw material assortment. The primary raw material has been procured from the Supply Base area and it consists of round wood/firewood. The raw materials are procured in well developed, free and open market with competition of other customers. Different assortments of raw materials are obtained from the logging. All companies of forest industry have public price lists for the assortments. The price lists reflect the solvency of the industry for different assortments. The price lists clearly indicate that logs and veneer logs are the most valuable assortments while firewood (e.g. for pellet production) is less valuable assortment. This information is derived from the documents and data submitted by suppliers and forest developers.



# 2.4 Flow diagram of feedstock inputs showing feedstock type



# 2.5 Quantification of the Supply Base

## Supply Base

- a. Total Supply Base area (ha): 13 213 916 cumulative area of all forest types within SB
- b. Tenure by type (ha): Government 13 213 916 milj., ha; Privately owned 1 092 700 milj/ ha;
- c. Forest by type (ha): boreal/16 966 578 million ha,
- d. Forest by management type (ha): Managed Semi- Natural 16 966 578 milj., ha
- e. Certified forest by scheme (ha): 11689000 hectares of FSC and 10990000 ha PEFC-certified forest

#### Feedstock

- f. Total volume of Feedstock: 400,000 600, 000 tonnes
- g. Volume of primary feedstock: 200,000 400,000 tonnes
- h. List percentage of primary feedstock (g), by the following categories. Subdivide by SBP-approved Forest Management Schemes:
  - Certified to an SBP-approved Forest Management Scheme
  - Not certified to an SBP-approved Forest Management Scheme
- i. List all species in primary feedstock:
  - Species: Picea abies (L.) H. Karst.); Pinus sylvestris (L.); Alnus glutinosa (L.) Gaertn.); Alnus incana (L.) Moench); Populus tremula (L.); Betula pendula (Roth; silver; Betula pubescens (Ehrh.)
- j. Volume of primary feedstock from primary forest- 0%
- k. List percentage of primary feedstock from primary forest (j), by the following categories. Subdivide by SBP-approved Forest Management Schemes:
  - Primary feedstock from primary forest certified to an SBP-approved Forest Management Scheme
  - Primary feedstock from primary forest not certified to an SBP-approved Forest Management Scheme



- Volume of secondary feedstock: SAWDUST and WOOD chips (Sawmill residues) feedstock as
  production waste from producers comes from Latvia, Estonia, Belarus 0 200,000 tonnes
  specify origin and type the volume may be shown as a % of the figure in (f) if a compelling justification
  is provided
- m. Volume of tertiary feedstock: 0 200,000 tonnes



# 3 Requirement for a Supply Base Evaluation

SBE completed	SBE not completed
х	

In SBP biomass supply evaluation is included the supply of primary feedstock to SIA Graanul Pellets, which confirms the supplied primary feedstock for the production of pellets as SBP-compliant. The evaluation process uses the risk assessment developed by the company, as in Latvia there is no single unified risk assessment approved by SPP, as well as inspection programme to reduce supply risks has been developed.

Risk assessment (RA) has been sent to a public consultation on August 12, 2016.

Risk assessment has been divided into: "Low risk", "Certain risk" or "Uncertain risk".



# 4 Supply Base Evaluation

# 4.1 Scope

- 4.1.1. Refers to primary feedstock supplies from Latvian forest properties after logging.
- 4.1.2. Refers to primary feedstock supplies from overgrown agricultural lands of Latvia.
- 4.1.3. Refers to secondary feedstock supplies from Latvia
- 4.1.4. Does not refer to secondary feedstock or other areas of origin.
- 4.1.5. Refers to primary feedstock supplies from Estonian forest properties after logging.

## 4.2 Justification

To reduce the supply risks, the primary and secondary feedstock in pellet production, pursuant to the risk assessment indicators, is subject to classification of risks of origin from potential risk to lower risk, in order to ensure full risk assessment and exclude feedstock supplies.

# 4.2.1 Primary and secondary feedstock supplies from Latvian forest properties

The assessment has been designed in compliance with the SBP standard No. 1; No. 2 version 1.0, March 2015, by developing and introducing a mitigation programme to reduce risks of primary and secondary feedstock purchases.

During the risk development stage, the risk assessment version for Latvia was taken into account which was available during the consultation process on the SBP website.

Initially, the company developed risk assessment, by assessing each risk indicator of SBP standard No. 1 version 1.0., March 2015. The risk assessment was created, based on the laws of Latvia, abidance by the laws, publications, stakeholder consultations, and leading expert guidance, as well as other resources of information.

Upon consulting with stakeholders, communicating with logging / primary feedstock suppliers and wood processors (secondary raw material suppliers), the situation was studied, and, by defining certain risks, the company developed a risk mitigation system.

# 4.2.2 Primary feedstock supplies from Estonian forest properties

SBP-approved risk assessment available on http://www.sustainablebiomasspartnership.org/documents/risk-assessments/regional-risk-assessments-for-the-baltic-states/estonia was applied to supplies from Estonia.



## 4.3 Results of Risk Assessment

# 4.3.1 Primary and secondary feedstock supplies from Latvian forest properties

Risk assessment analysis included regulatory activities prescribed in national laws and regulations.

Having regards to the peculiarities existing in Latvia, as well as expert proposals and recommendations, the following was used "Specified risk with regard to biotopes, labour safety, bird habitats and cultural heritage objects."

## 4.3.2 Primary feedstock supplies from Estonian forest properties

In the regional risk assessment, "Specified risk" is applied with regard to potential threats to the protection of high conservation value biotopes.

# 4.4 Results of Supplier Verification Programme

# 4.4.1 Primary and secondary feedstock supplies from Latvian forest properties

On-site inspection results, which are described below and are linked to a specified risk, as well as documentary evidence on the performed audits that are available to third parties, allow obtaining information about the risk of supplies of each supplier at the supply level, to timely identify potentially possible threats in any of the specified risk indicators.

Information obtained during risk assessment from legislation and from on-site information verification about all SBE risk categories confirmed that specified risk is applicable to 4 categories (HCV category 3), labour safety and bird habitats (HCV category 1), and cultural history objects (HCV category 6), whereas in other categories, the risk is low.

Within the framework of the mitigation audit, the relevance of the specified risks in the forest management sector was confirmed.

# 4.4.2 Primary feedstock supplies from Estonian forest properties

It is known that Estonia has performed inventory of high conservation value biotopes, but logging in these territories is not prohibited, therefore the specific risk is topical.

# 4.5 Conclusion

# 4.5.1 Primary and secondary feedstock supplies from Latvian forest properties

By performing SBE since January and upon reviewing co-operation with companies falling within risk categories, effective information exchange has been ensured and timely mitigation of risks has been made possible. The implemented mitigation measures have resulted in 2 suppliers being evaluated as SBE low risk



category supply level, 16 suppliers, who are in the process of implementing a monitoring system, and cooperation with 3 suppliers has been terminated. The scope of purchased FSC and PEFC roundwood firewood feedstock ensures SBP compliant biomass base volume for Graanul Pellets SIA. However, supply base risk confirmation and SBE certification assessment process by a third independent party is only the beginning to identify SBP compliant suppliers. In co-operation with stakeholders and environmental organisation members, the desirable co-operation effect with suppliers has been achieved, by explaining the risk factors and obtaining the desirable SBP compliant result of feedstock supplies.

Simultaneously, a risk mitigation system is implemented for wood processors (secondary feedstock suppliers). The system is based on monitoring of primary feedstock and introduction of a credit system of SBP compliant material.

By the end of 2016, it is planned to assess the conformity of all suppliers to the SBE requirements. In 2017, all requirements established for primary and secondary feedstock suppliers will correspond to the SBE requirements.

It is a potential risk that roundwood is supplied by such a supplier, who commits violations with regard to specified risk forest units, but who is included and confirmed as a supplier of SBP compliant assortment; additional audits are performed within the framework of procedures depending on the supplier's logging intensity.

### 4.5.2 Primary feedstock supplies from Estonian forest properties

It is defined in the company's feedstock acceptance procedure that, upon accepting feedstock from Estonian forest properties, documentary references must be checked to make sure that certain biotopes are not found at the site of origin. No feedstock from biotope regions is accepted, therefore feedstock from Estonia is SBP compliant.



# 5 Supply Base Evaluation Process

Risk assessment results, based on site visits and consultations with forest management/ logging and wood processing companies regarding mitigation measures, were subjected to public discussion, public consultation was carried out with non-governmental organisations and societies. The company organises seminars for loggers, primary and secondary feedstock suppliers, by engaging experts, concerning certain risk indicators.

To reduce supply risks for primary and secondary feedstocks in pellet production, pursuant to risk assessment indicators, the risks of origin are classified from potential risk to lower risk, to ensure full risk assessment and exclude the supply of non-compliant feedstock.

The supply risk assessment system includes an audit mechanism plan for risk assessment within the framework of the supply base. The plan and inspection criteria are available at the company only upon special request due to confidentiality considerations.

To develop an SBE system, supply assessment and risk mitigation measures have been performed at SIA Graanul Pellets, by attracting the existing staff, procurement manager, who is trained as a forest management engineer with a 20 years' experience on the wood procurement market in the Baltic States. The manager has a long-standing experience in maintaining an FSC system and wood origin assessment in forest management, 20 years of experience and knowledge in forest management and wood supplies, procurement and legislation matters.

SIA Lodret consultant — wood processing technologist with more than 13 years' experience in the timber industry, 8 years' experience as the leading auditor of FSC; PEFC forestry and supply certification.

The development of the SBP SBE mitigation system is based on experience with FSC supplies and FSC forest certification system and knowledge in forest management, as well as timber industry education and forestry supplies from the legislative viewpoint; consultations with governmental and non-governmental organisations.



# 6 Stakeholder Consultation

SIA Graanul Pellets:

On 12 August 2016, SBP risk assessment was published on the website.

On 10 February 2016, a letter was sent electronically by informing the stakeholders about the risk assessment developed in accordance with the SBP standard. The list of stakeholders was created so as to include the maximum number of recipients, including economic, social and environmental representatives, as well as local governments.

Risk assessment is available at http://www.latgran.com/en/policy/sustainable-biomass-partnership

The list was sent to 230 recipients, and it is available at the company.

Simultaneously, face-to-face and over the phone stakeholder consultations were held, and seminars were attended regarding SBP implementation; lists are available at the company.

# 6.1 Response to stakeholder comments

The report as reviewed and returned to the following reviewers with commentary from the following:

Latvian World Wildlife Foundation — opinion, SBP risk assessment and recommendation

**Comment 1:** The special risk of the indicator 2.1.1 is applicable **to all uncertified forests**, and not only to private forests. Explanation — no evidence in practice that a better situation is observed in local government-or church-owned forests.

Remark — must promote the knowledge of logging work managers/performers regarding biodiversity protection measures, felling works, incl., recognisability of biotope signs, and experts of forest ecology should be involved in practice in special cases.

Response 1: Corrections have been included in the risk assessment, by including "...applicable to all uncertified forests"

**Comment 2:** The special risk of the indicator 2.1.2 is applicable **to all uncertified forests**, without emphasising the problem in privately owned forests. Explanation — no evidence in practice that a better situation is observed in local government- or church-owned forests.

Response 2: The indicator 2.1.2 has been updated to include ".... applicable to all uncertified forests"

**Comment 3:** In the findings part of the indicator 2.2.5, the last paragraph should emphasise that **currently** no risks are observed. Explanation — ever more often, discussions arise among forest ecology experts, nature specialists, non-governmental organisations in the sphere of wildlife, by voicing concerns of potential future risks as biomass extraction in felling sites is intensified.

**Response 3:** Additions have been made to the relevant part of indicator 2.2.5.



**Comment 4:** It can be agreed that special risk should not be applicable to indicator 2.3.2 should, however it must be indicated in the "Finding" section that the logging performers must improve (increase qualification) knowledge about the implementation of environmental and nature protection requirements in felling works, incl., in biotope protection.

**Response 4:** updated indicator 2.3.2, seminars are organised by Graanul Pellets SIA to improve qualification for loggers and forest owners, by including a full spectrum of biotope characteristics, cultural history objects and bird habitats.

World Wildlife Foundation in Latvia — opinion about the SBP risk mitigation system and recommendation:

**Comment 5:** It is planned to involve a biotopes expert in the assessment of biotopes. By employing a specialist evaluation on site or by developing and updating questionnaires, it is necessary to engage experts, who are certified in compliance with Cabinet Regulations No. 267 of 16 March 2010 "Procedures for Certification of Experts in the Field of Conservation of Species and Biotopes and Supervision of the Activities Thereof" (The publicly available register of experts certified in the field of conservation of species and biotopes at daba.gov.lv);

Response 5: Certified biotope experts are and will be used in the creation of the system.

**Comment 6**: Identification of bird nesting sites and the risk mitigation mechanism training is planned 1x per year for new primary biomass suppliers, by engaging ornithologists or biotope experts. Training is to be included also in the part of biotopes

**Response 6:** To carry out supplies, a supplier must be trained and informed about the protected biotopes, bird and heritage values

**Comment 7:** Training must be organised at least once in 2 years also for the existing suppliers, in order to update their knowledge about biotopes and their identification. The training of the new and existing primary biomass suppliers must include also topics of general natural protection requirements in logging:

Response 7: The comment will be taken into account and procedures will be updated

**Comment 8:** In the future, it is necessary to assess the possibility of including in the audit also a general assessment of nature protection requirements in logging, because primary biomass development has a significant impact also on the preservation of deadwood and keeping certain underwood tree/shrub groups, specimen in felling sites;

Response 8: According to information at our disposal, this matter is topical near cities

**Comment 9:** Update with the applicable system of Nature Date Management of the Nature Protection Council Ozols (http://www.daba.gov.lv/public/lat/dati1/dabas\_datu\_parvaldibas\_sistema\_ozols/).

Response 9: Procedure updated

**Comment 10:** From time to time, every several years, it is necessary to evaluate the risk mitigation practice and, if necessary, review the frequency of inspections and audits.

Response 10: Will definitely be assessed every year

Over-the-phone comments from the Nature Protection Council:

**Comment 11:** In Latvia, secular trees are protected by law and, to mitigate the risk, it is necessary to include the relevant clauses in the contract and specifications.

Response 11: The assortment is controlled with the relevant restrictions in the material specifications

The Latvian Ornithological Society has studied the SBP defined risk mitigation schemes and principles developed in 2016 by SIA "Graanul Pellets":



We appreciate the possible biotope assessment questionnaire developed by SIA "Graanul Pellets", which allows excluding especially protected biotopes, which can be important bird habitats, from logging. Additional security is offered by the fact that the said questionnaire includes also elements that are directly significant to birds, such as dried out deadwood or stumps, growing and dead trees pecked by birds, and large nests.

However, the identification and exclusion of especially protected biotopes from logging does not eliminate high risks for birds (including for especially protected species), therefore, we recommend the following mitigation measures:

**Comment 12:** To establish an obligation for the suppliers to suspend logging from 1 April until 30 June or if that is not feasible, during a period that is as close to the said period as possible, however not shorter than two months.

**Response 12:** We will be negotiating with suppliers, because, bearing in mind that April always corresponds to road closures and low logging intensity, works often are resumed only after reopening of roads.

Comment 13: In the biotope assessment questionnaire, assign 10 points to large nests, if any are found, or determine an obligation to obtain a certified bird expert opinion. Each large nest should be examined to make sure that it does not belong to a species, for the protection of which a micro-reserve should be created. Cases when there are more than three large nests per hectare (which would allow allocating 2 points), will be extremely rare, therefore there will be significant risks to the large nests that are not found in especially protected biotopes.

**Response 13:** We will take the proposal into account and will update the questionnaire, as well as will make changes in the procedures regarding the evaluation and recording of large nests.

Opinion of experts of species and biotopes:

**Comment 14:** With the help of a questionnaire, it is possible to identify forest stands that could be good quality protected biotopes (incl., forest stand key biotopes), and the quality criteria of which are based on structures important for biological diversity. The survey will help identify also several potential biotope places in cases when a large part of structural elements are not decisive factors in identification — these are quagmires, marshy forests and gorge and slope forests. Assessment of deadwood allows to evaluate the food base available for birds.

Labour safety consultations:

**Comment 15** The questionnaire is expected to identify the key risk factors that employees working at a felling site might be subjected to. The questionnaire has been developed based on Cabinet Regulations No. 310 "Labour safety requirements in forest management"



# 7 Overview of Initial Assessment of Risk

# 7.1. Primary and secondary feedstock supplies from Latvian forest properties

The below table offers a summary of risk assessment. The risk assessment was performed based on theoretical information that is obtained from laws, scientific materials, publications, State Forest Service data. After the publication of the risk assessment, SIA Graanul Pellets started on-site verification of two identified risks. The results are shown in Paragraphs 7vand 8.

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

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

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



# 7.2. Primary feedstock supplies from Estonian forest properties

Table 2. Overview of risk assessment results of all indicators (prior to supplier verification programme (SVP))

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

lu dia atau	Initial Risk Rating			
Indicator	Low	Specified	Unspecified	
2.2.9.	Х			
2.3.1.	Х			
2.3.2.	Х			
2.3.3.	X			
2.4.1.	Х			
2.4.2.	Х			
2.4.3.	Х			
2.5.1.	Х			
2.5.2.	Х			
2.6.1.	Х			
2.7.1.	X			
2.7.2.	X			
2.7.3.	Х			
2.7.4.	X			
2.7.5.	X			
2.8.1.	Χ			
2.9.1.	Х			
2.9.2.	Χ			
2.10.1.	Χ			



# 8 Supplier Verification Programme

# 8.1 Description of the Supplier Verification Programme

#### 8.1.1 Primary and secondary feedstock supply from Latvian forest properties

The risk mitigation audit programme is coordinated with the senior management of the company. The supplier audit plan was divided according to the possible biotopes that are included in the database of Latbio. The main goal during the audit is to make sure that raw material suppliers understand the established risks and observe requirements set to jointly mitigate the risks. The objective is to audit all suppliers and evaluate their conformity to the selected criteria.

The supplier audit considers the following values: logging organisation's work safety and logging organisation's evaluation of biotope presence before initiating forest logging, preserving the cultural heritage objects and bird protection, the additionally implemented monitoring system and the implemented credit system for secondary suppliers.

During the audit, the following forms are filled in:

- (1) Audit template approved by the biotope expert a report, whereby it can be established whether a company is ready to supply an SBE conformant assortment, or the supplier has to introduce corrections and the audit has to be repeated.
- (2) Approved labour safety audit form for logging.
- (3) Resource origin audit template, which includes also auditing the implementation of a credit system for wood processing.

During the risk mitigation process, the company will encourage the acceptance of feedstock from suppliers who are ready to implement the proposed mitigation system. The Supplier Verification Programme procedures are available at the company.

# 8.1.2 Primary feedstock supplies from Estonian forest properties

Based on the biotope inventory performed in the state and the available documentary information in the consignment documentation accompanying the feedstock, the risk mitigation programme included only document inspection to make sure that high conservation value biotopes are not found at the sites of feedstock origin.

# 8.2 Site visits

## 8.2.1 Primary and secondary feedstock supplies from Latvian properties

The selection of audited territories and suppliers was performed so as to include most of the supply regions and various logging companies and subcontractors, service providers. The logging regions included in the audit programme: municipalities of Madona, Gulbene, Smiltene, Alūksne, Ogre.

Within the framework of the risk identification and mitigation programme of possible biotopes, bird nests, cultural heritage objects and labour safety, 60 forest management units were visited, of which



- 26 forest units were visited before the initiation of logging;
- 48 forest units after logging;
- 26 labour safety visits to logging companies and their subcontractors, service providers;
- 4 woodworking companies.



The map shows the supply region.

# 8.2.2 Primary feedstock supplies from Estonian forest properties No site visits required.

# 8.3 Conclusions from the Supplier Verification Programme

# 8.3.1 Primary and secondary feedstock supplies from Latvian forest properties

#### The labour safety risk programme procedures are available at the company

Labour safety was inspected starting from 19 January 2016. Audits were previously planned and were carried out in 11 companies, altogether 32 audits (which amounts to 88 % of all suppliers) (suppliers, logging companies and their subcontractors) during logging, the information from suppliers about the logging sites and service providers was requested in advance. The audited territories and suppliers were selected so as to include inasmuch of the supply regions and various logging companies and their subcontractors as possible.



The logging regions included in the audit programme: regions of Vidzeme, Latgale, Zemgale. Records and observations were made about each audit.

The conclusion after the performed audits is that logging can be divided in two categories:

- 1) Logging process with machinery considerably reduces labour safety risks. Insubstantial shortcomings were found and defined as low risk
- 2) Logging process with handheld chainsaws is defined as high risk

#### Identification of biotopes, bird habitats, cultural heritage objects and monitoring risk programme

**A biotope** monitoring risk programme was initiated on 19 January 2016. Audits were prearranged and 85 forest audits have been carried out. Territories and adjacent areas audited: before logging, during logging and after logging, which according to the Latbio database were possible forest biotopes.

The audited territories and suppliers were selected so as to include most of the supply regions and various logging companies and their subcontractors. The logging regions included in the audit programme: regions of Vidzeme, Latgale, Zemgale. Records and observations were made about each audit.

The conclusion made after the audits:

- Suppliers understand the mechanism of biotope evaluation and the necessity to perform it before logging, because there was only one case when there was a high possibility of existing forest biotopes when inspecting the site and it amounts only to 3 % of performed audits.
- Cultural heritage is considered during logging process, the former being regulated by the legislation of Latvia — no violations were found; during the audit, one acknowledgment from a local government about preserving cultural heritage was expressed.
- 3) During the audit, no violations concerning bird monitoring were found deadwood and standing trees are left in cutovers. Furthermore, various logging restrictions defined in the administrative territories are followed.

During the audit, logging companies are ready to show the territories that are left as biotopes and logging will not be performed.

## 8.3.2 Primary feedstock supplies from Estonian forest properties

By the time of preparing the report, 2 supplies have occurred and the consignment documentation contained a confirmation that no biotopes have been found at the site of origin of feedstock.



# 9 Mitigation Measures

# 9.1 Mitigation measures

# 9.1.1 Primary and secondary feedstock supplies from Latvian forest properties

After site monitoring audits, upon evaluating possible biotopes and labour safety risks, the management of the company has decided to exclude those suppliers from the suppliers' list that, at repeated audit, did not conform to the mitigation programme's criteria of permissible outcomes established in the company.

From 01.01.2016, the number of roundwood suppliers and secondary suppliers has been substantially reduced. The FSC or PEFC requirements for organisation of logging and woodworking were implemented as a criterion, along with readiness to comply with the requirements set by SBE.

SIA Graanul Pellets, by hiring biotope experts, as well as forest management and labour safety experts, hold additional informative seminars for suppliers to better inform the suppliers about the supply conditions and potential risks, thereby reducing the supply of noncompliant feedstock assortment according to the requirements of SBP/SBE standards..

Supply contracts include conditions of additional requirements for biotope identification, labour safety, restrictions of hardwood tree species and the restriction of maximum diameter. See the following table.



	Riska	Main coments and Mitigation Measure/Galvenie komentāri un mazināšanas pasākumi
	The BP has control systems and procedures for verifying that forests and other areas	
	with high conservation values are identified and mapped	
	BP ir kontroles sistēmas un procedūras, lai pārbaudītu, ka meži un citas teritorijas ar augstu saglabāšanas vērtības tiek identificētas un kartētas	
	The SBP has control systems and procedures to identify and address	1
2.1.1. and	potential threats to forests and other areas with high conservation values	
2.1.2.	from forest management activities	
	SBP ir kontroles sistēmas un procedūras, lai identificētu un novērstu	
	iespējamos draudus mežos un citās jomās ar augstu aizsardzības vērtībām	
	no meža apsaimniekošanas darbībām	
	no meza apsammekosanas darbibam	Gl approach "Habitat identification system".
		LATBio database
		Felling's audited but table, which is approved by licensed biotope expert, like good tool to
		identify WKH.
	Woodland Key Habitas (WKH)/	Supplier's trainings respect to WKH, by licensed biotope expert.
	Woodland Rey Habitas (WKH)/	Gl izveidota "Meža biotopu identifikācijas sistēma".
	Mežu biotopi (MB)	LATBio datu bāze
	INIEZU DIOCOPI (INIB)	Cirsmas audita uzskaites tabula, kuri ir apstiprinājis licenzēts biotopu eksperts, lai identificētu
		MB.
		Piegādātāja treniņi atpazīt MB, licencētās biotopu eksperts līdzdalību.
		Nobel tree species in cargo can be no more like 20%, and no bigger like 70cm in diameter. It is
		written in raw material supply contracts. From secondary feedstock GI do not purchase material
		which is produced from Oak, ash, elm.
		Cietās lapu koku sugas nevar būt vairāk kā 20%, un nav lielāks diametrs par 70cm. Tas ir rakstīts
	Wood from Old Country Estates/	izejvielu piegādes līgumiem. No sekundāro izejvielu GI nepērk materiālu, kas tiek ražots no
	Koksne no Old Country Estates	ozols, osis, goba.
		GI approach "Habitat identification system".
		LATBio database
		Felling's audited but table, which is approved by licensed biotope expert, like good tool to
		identify BIRD NESTING SITES.
		Supplier's trainings respect to bird nesting sites, by licensed biotope expert
		GI izstrādāta "Biotopu identifikācijas sistēma".
		LATBio datu bāze
		Cirsmas audita uzskaites tabula, kuri ir apstiprinājis licenzēts biotopu eksperts, tāpat kā labs
		instruments, lai noteiktu putnu ligzdošanas vietas.
	Bird Nesting sites/Putnu ligzdošanas vietām	Piegādātāja treniņi atpazīt putnu ligzdošanas vietas, ar licencētās biotopu eksperts.
		GI approach "Work safety system".
	The SBP has control systems and procedures for verifying that appropriate	Felling's audited but table, which is approved by licensed work safety specialist, like good tool
	safeguards are put in place to protect the health and safety of forest	to identify work safety in fellings.
	workers	GI izstrādāta "Darba drošības sistēma".
	SBP ir kontroles sistēmas un procedūras, lai pārbaudītu, vai attiecīgie	Cirsmas audita uzskaites tabula, kura ir apstiprinājis ar licencētā darba drošības speciālistu,
	drošības pasākumi ir ieviesti, lai aizsargātu veselību un drošību, mežā	instruments, lai noteiktu darba drošību mežizstrādē.
	strādājošiem	
2.8.1.		

# 9.1.2 Primary feedstock supplies from Estonian forest properties

The consignment documents of each truckload is checked before the cargo is inspected. The feedstock acceptance procedures provide that feedstock from areas, which, according to the results of biotope inventory of the state, have biotope presence, will not be accepted.

# 9.2 Monitoring and outcomes

# 9.2.1 Primary and secondary feedstock supplies from Latvian forest properties

Upon detecting labour safety violations and possible presence of biotopes during supplier audits, the supply from 1 supplier was restricted. Supply region – Vidzeme, Latgale, Zemgale.

After reducing the number of suppliers, and also by including conditions of supply in the contracts regarding additional requirements for labour safety and biotope identification by suppliers, biotope characteristics according to <a href="http://latbio.lv/MBI/">http://latbio.lv/MBI/</a>, feedstock flow from risk areas is monitored.



To reduce the number of Roundwood suppliers by 80 % from 01.01.2016, the FSC or PEFC requirements were implemented as a criterion for organising logging, along with readiness to comply with the requirements set by SBE.

After on-site monitoring audits, upon evaluating the possible biotopes and labour safety risks, the management has decided to exclude those suppliers from the suppliers' list that, during the audit, did not conform to the mitigation programme criteria of permissible outcomes established at the company. By 01.08.2016, 3 roundwood suppliers were excluded.

Logging companies have developed an understanding about the SBE requirements and have accepted the necessary procedures to fulfil them, and the process is ongoing.

As a result of the audits: as of 01.08.2016, there are 2 supply companies that can be recognised as SBP Compliant Biomass Suppliers to 100 %, and 16 suppliers that are in the process of implementing the system and the implementation process is planned to be finished until the end of year 2016. It is planned that by the year 2017 all proposed requirements for primary feedstock suppliers will correspond to the SBE requirements.

As a result of the audit, as of 28.08.2016, there are 2 secondary feedstock supply companies that are actively implementing an accounting and control system and are ready for a final audit. It is planned that by the year 2017 all proposed requirements for secondary feedstock suppliers will correspond to the SBP requirements.

#### 9.2.2 Primary feedstock supplies from Estonian forest properties

It has been confirmed that cargo consignment documents for feedstock from Estonian forest properties contain sufficient information to consider that the risk of receiving feedstock from biotope regions is low.



# 10 Detailed Findings for Indicators

Detailed information about each indicator is provided in risk assessments.

Risk assessment for Latvia is available at <a href="http://www.latgran.com/en/policy/sustainable-biomass-partnership">http://www.latgran.com/en/policy/sustainable-biomass-partnership</a>

Risk assessment for Estonia is available at <a href="http://www.sustainablebiomasspartnership.org/docs/SBP-endorsed-Regional-Risk-Assessment-for-Estonia.pdf">http://www.sustainablebiomasspartnership.org/docs/SBP-endorsed-Regional-Risk-Assessment-for-Estonia.pdf</a>



# 11 Review of Report

## 11.1 Peer review

The end version of the report was sent to specialists working with wood industry, forest management and forest environment processes.

The report was reviewed and returned with comments by:

**Regarding the SBP section: Henrik Välja** — Estonian Forest and Wood Industries Association Tallinn Technical University

**Regarding the SBP/ SBE section:** Jānis Rozītis — World Wildlife Foundation (WWF Latvia) — experienced in sustainable forest management practice, assessment.

## 11.2 Public or additional reviews

No public or additional reviews have been made.



# 12 Approval of Report

Approval of	Approval of Supply Base Report by senior management					
Report Prepared by:	Janis Mickevics	Production manager	12.08.2016			
by.	Name	Title	Date			
and do here	The undersigned persons confirm that I/we are members of the organisation's senior management and do hereby affirm that the contents of this evaluation report were duly acknowledged by senior management as being accurate prior to approval and finalisation of the report.					
Report approved by:	Aleksandrs Zjatkovs	Executive director	12.08.2016			
<b>y</b> .	Name	Title	Date			
Report approved by:	[name]	[title]	[date]			
	Name	Title	Date			
Report approved by:	[name]	[title]	[date]			
	Name	Title	Date			



# 13 Updates

Not applicable.

- 13.1 Significant changes in the Supply Base Not applicable.
- 13.2 Effectiveness of previous mitigation measures Not applicable.
- 13.3 New risk ratings and mitigation measures Not applicable.
- 13.4 Actual figures for feedstock over the previous 12 months 01.01.2015- 31.12.2015 is 400,000 600,000 tonnes
- 13.5 Projected figures for feedstock over the next 12 months
  01.01.2016- 31.12.2016 is 400,000 600,000 tonnes