

Supply Base Report: Latgran SIA Krāslava pellet mill

Third Surveillance Audit

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Completed in accordance with the Supply Base Report Template Version 1.3

For further information on the SBP Framework and to view the full set of documentation see www.sbp-cert.org

Document history

Version 1.0: published 26 March 2015

Version 1.1 published 22 February 2016

Version 1.2 published 23 June 2016

Version 1.3 published 14 January 2019

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1 Overview

Producer name: SIA “LatGran”, production site Kraslava
Producer location: “Latgran”, Station “Kraslava”, parish Udrišu, district Kraslava, LV-5601
Geographic position: 55°55’48”; 27°08’17”
Primary contact: Līga Hermāne (quality manager), telephone: +371 26317722,
 email: liga@latgran.com
Company website: www.latgran.com
Date report finalised: 08/Nov/2019
Close of last CB audit: 12/Nov/2019
Name of CB: NEPCon SIA
Translations from English: Yes (Latvian)
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: <https://sbp-cert.org/documents/standards-documents/standards>
SBP Endorsed Regional Risk Assessment:
 Latvia: <https://sbp-cert.org/docs/SBP-endorsed-Regional-Risk-Assessment-for-Latvia.pdf>
Weblink to SBE on Graanul Invest group Latvian based companies website:
<http://www.latgran.com/en/policy/sustainable-biomass>

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

2 Description of the Supply Base

2.1 General description

SIA "Latgran" most of the raw materials as feedstock primary and secondary from feedstock originating from Latvian and Belarus.

Proportions of SBP feedstock product groups (2018):

Controlled Feedstock, 6 % 36 suppliers

SBP-compliant Primary Feedstock, 46% 22 supplier

SBP-compliant Secondary Feedstock, 48% 9 suppliers

SBP-compliant Tertiary Feedstock, 0%

SBP non-compliant Feedstock 0%

Proportions of SBP feedstock product groups (2019 6 months):

Controlled Feedstock, 6% 24 suppliers

SBP-compliant Primary Feedstock, 31 % 17 suppliers

SBP-compliant Secondary Feedstock, 63 % 8 suppliers

SBP-compliant Tertiary Feedstock, 0 %

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), *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.¹

¹ 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%).²

Distribution of forests by the dominant species (2018):

- pine 40,3 %;
- spruce 18,1 %;
- birch 26,1 %;
- black alder 3,1 %;
- grey alder 5,1 %;
- aspen 6,0 %;
- oak 0,4 %;
- ash 0,6 %;
- other species 0,3 %.³

Share of species used in reforestation, by planting area (2018):

- pine 15 %;
- spruce 19 %;
- birch 30 %;
- grey alder 14 %;
- aspen 18 %;
- other species 4 %.⁴

Timber production by types of cuts, by volume produced (2018):

- final cuts 82,3 %;
- thinning 12,2 %;
- sanitary cuts 2,6 %;
- deforestation cuts 1,1 %;
- other types of cuts 1,8 %.⁵

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.⁶

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.⁷

² State Forest Services: vmd.gov.lv, 2015

³ <https://www.zm.gov.lv/valsts-meza-dienests/statiskas-lapas/meza-statistikas-cd?id=720#jump>, 2018.

⁴ <https://www.zm.gov.lv/valsts-meza-dienests/statiskas-lapas/meza-statistikas-cd?id=720#jump>, 2018.

⁵ <https://www.zm.gov.lv/valsts-meza-dienests/statiskas-lapas/meza-statistikas-cd?id=720#jump>, 2018.

⁶ www.zm.gov.lv

⁷ State Forest Services: www.vmd.gov.lv

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.⁸

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.

BELARUS forest resources

In Belarus forests land cover area of 9,5 mln hectares. According to the data of Ministry of Forestry of the Republic of Belarus amounts to 39,8 %.⁹

⁸ Latvia's State Forests: www.lvm.lv

⁹ <https://www.mlh.by/en/our-main-activities/forestry/forests/>

Total land area of Belarus: 20760 thousands hectares
Total agricultural land area: 8501,6 thousands hectares¹⁰
Total forest land area: 9582,0 thousands hectares, covered by forests - 8260,9 thousands hectares.¹¹

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.¹²

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%.¹³

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

- final cuts 34,5 %;
- thinning 45,79 %;
- other types of cuts 19,62 %.¹⁴

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 and seeding and 19% by natural regeneration.¹⁵

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.

¹⁰ <http://aw.belal.by/russian/prof/prof.htm#earthquake>, 2018

¹¹ <http://mlh.by/our-main-activites/forestry/forests/>, 2018

¹² <http://www.mlh.by>, 2015

¹³ <http://www.mlh.by>, 2015

¹⁴ <http://www.mlh.by>

¹⁵ <http://belstat.gov.by/> (2015)

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.

2.2 Actions taken to promote certification amongst feedstock supplier

For the production of SBP pellets, preference is given to suppliers certified according to FSC and PEFC systems and delivering certified material. In cooperation with suppliers of controlled wood, the company prefers those who undertake to mitigate the risks in accordance with the procedures developed by the company to obtain SBP compliant material.

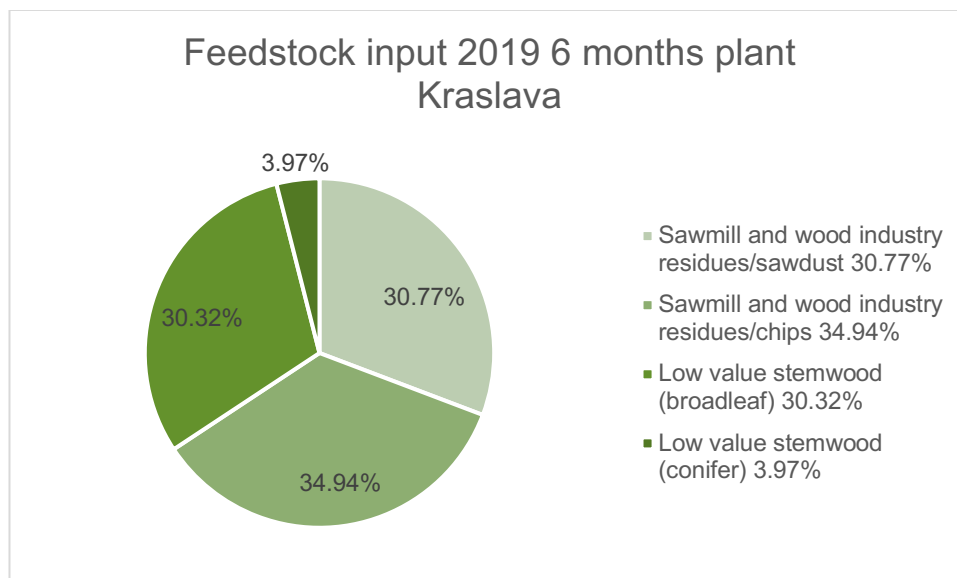
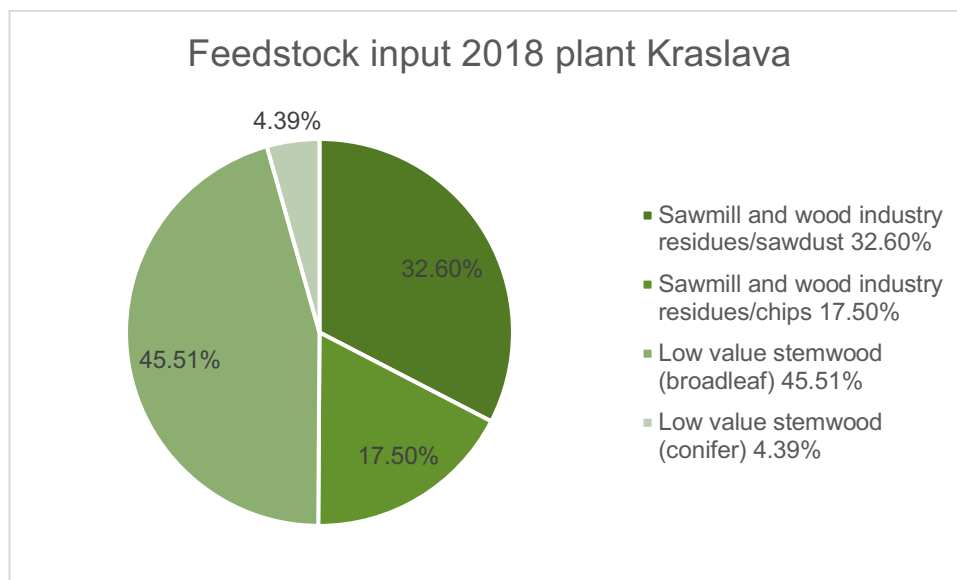
The effectiveness of the measures is evidenced by the significant increase in SBP-compliant material in recent years: before certification started, SBP-compliant wood was delivered by 4 primary wood suppliers in 2015, bringing 8% of the total raw material, and 4 secondary feedstock suppliers (supplied 1% of total feedstock amount). In 2018 and 2019 (6 months), however, SBP compliant feedstock was received from ~20 primary feedstock suppliers providing more than 30 % of the total raw material and 8-9 secondary feedstock suppliers bringing more than 48% of total raw material.

2.3 Final harvest sampling programme

The proportion of biomass quantity as primary raw material after final fellings is about 50% in 2018 and 34% in 2019 6 months¹⁶ 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.

¹⁶ Company's 2018 and 2019 (6 months) accounting data

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



2.5 Quantification of the Supply Base

Supply Base

- Total Supply Base area (ha): Latvia 3,056 mln, Belarus 9,582 mln. Total 12,638 mln ha
- Tenure by type (ha): 11,078 mln state forests, 1,56 mln ha private forests.
- Forest by type (ha): boreal – 12,638 mln ha
- Forest by management type (ha): managed semi-natural – 12,638 mln ha

- e. Certified forest by scheme (ha), 2018: FSC certified-10,036 mln ha¹⁷ and PEFC certified forests-10,302 mln ha.¹⁸

Feedstock

Period: 01.07.2018 – 30.06.2019

Note: ranges area used because reporting specific numbers would provide confidential information about our performance indicators and recipes.

- f. Total volume of Feedstock: 200,000 – 400,000 tonnes
- g. Volume of primary feedstock: 0 – 200,000 tonnes
- h. List percentage of primary feedstock (g), by the following categories:
- Certified to an SBP-approved Forest Management Scheme PEFC or FSC: 0% - 19%
 - Not certified to an SBP-approved Forest Management Scheme: 80% - 100%
- i. List all species in primary feedstock, including scientific name
Picea abies (L.) H. Karst.; Pinus sylvestris (L.); Alnus glutinosa (L.) Gaertn.; Alnus incana (L.) Moench, Populus tremula (L.); Betula pendula (Roth), sudraba; 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.
- Primary feedstock from primary forest certified to an SBP-approved Forest Management Scheme: 0%
 - Primary feedstock from primary forest not certified to an SBP-approved Forest Management Scheme 0%
- l. Volume of secondary feedstock: sawdust and wood chips (sawmill residues) feedstock as production waste from producers comes from Latvia (13,54%), and Belarus (86,46%): 60%-79%
- m. Volume of tertiary feedstock: 0%

¹⁷ <https://ic.fsc.org/en/facts-and-figures>

¹⁸ <https://storage.googleapis.com/pefc-platform/pefc.org/media/2019-04/e7c9eb68-cf8e-44dd-870b-b14108c30ccb/7747906b-375a-534c-a1e3-f71559ed0dc1.pdf>

3 Requirement for a Supply Base Evaluation

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

In SBP biomass supply evaluation is included the supply of primary and secondary feedstock to SIA Latgran, which confirms the supplied primary feedstock for the production of pellets as SBP-compliant. The evaluation process uses the SBP endorsed risk assessment for Latvia.

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.

4.2 Justification

SIA "Latgran" since July 2015 is owned by company AS "Graanul Invest" and according to owner decision, preparing for SBP certification were done together with other AS "Graanul Invest" plants based in Latvia: SIA "Graanul Invest" and SIA "Graanul Pellets". The representatives of the group of companies of "AS "Graanul Invest" in Latvia on behalf of all three companies (SIA "Latgran", SIA "Graanul Invest" un SIA "Graanul Pellets") provided information to stakeholders regarding risk assessment for Latvia and the planned risk mitigation measures.

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.

In September, 2017 the SBP has endorsed the Regional Risk Assessment for Latvia.
<https://sbp-cert.org/documents/risk-assessments/latvia>

The SBP endorsed version of RRA does not differ in relation to risk level for individual indicators from the risk assessment developed by Graanul Invest Group.

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.”

4.4 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.

4.5 Conclusion

4.5.1. Primary and secondary feedstock supplies from Latvian forest properties

By performing SBE since 2015 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 8 primary suppliers being implemented risk mitigation system and after positive results of audit will be evaluated as SBE low risk category supply level. 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.

5 Supply Base Evaluation Process

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.

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.

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.

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.

The following skills are required for a staff involved in maintaining the Supply Base Evaluation system and works towards achieving the objectives of this system:

- knowledge of ecological and social values associated with the SB
- knowledge of applicable laws and regulations
- knowledge of business management practices
- knowledge of operation of suppliers, including management systems and products
- knowledge of the local forest resource
- competence in evaluating SBP requirements
- competence in implementing the SBE
- language skills appropriate to all stakeholders
- note-taking and report-writing skills
- interviewing skills
- appropriate management skills.

To develop an SBE system, supply assessment and risk mitigation measures have been performed at SIA Latgran, 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.

6 Stakeholder Consultation

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

On 12 August 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. The list was sent to more than 60 recipients

Simultaneously, by the representatives of the group of companies of "AS "Graanul Invest" in Latvia face-to-face and over the phone stakeholder consultations were held, and seminars were attended regarding SBP implementation; lists are available at the company.

In September, 2017 the SBP has endorsed the Regional Risk Assessment for Latvia.
<https://sbp-cert.org/documents/risk-assessments/latvia>

The SBP endorsed version of RRA does not differ in relation to risk level for individual indicators from the risk assesment developed by Graanul Invest Group.

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 organisation.

We appreciate the possible biotope assessment questionnaire developed by organization, 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 Latgran started on-site verification of two identified risks. The results are shown in Paragraphs 7 and 8.

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

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

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

8 Supplier Verification Programme

8.1 Description of the Supplier Verification Programme

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.

8.2 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..

Within the framework of the risk identification and mitigation programme of possible biotopes, bird nests, cultural heritage objects and labour safety, 11 suppliers and 50 forest management units were visited. 3 of suppliers are evaluated as SBP-compliant, audits of remaining suppliers are still in progress.

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 audits were previously planned and were carried out in 6 companies, altogether 11 audits. Audits were performed 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. 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 audits were prearranged and 11 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. Records and observations were made about each audit.

The conclusion made after the audits:

- 1) Suppliers understand the mechanism of biotope evaluation and the necessity to perform it before logging.
- 2) 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.

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.

Organization, 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
2.1.1. and 2.1.2.	<p>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</p> <p>The SBP has control systems and procedures to identify and address potential threats to forests and other areas with high conservation values 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</p>	
	Woodland Key Habitats (WKH)/ Mežu biotopi (MB)	<p>GI approach "Habitat identification system". LATBio database Felling's audited but table, which is approved by licensed biotope expert, like good tool to identify WKH. Supplier's trainings respect to WKH, by licensed biotope expert. GI izveidota "Meža biotopu identifikācijas sistēma". LATBio datu bāze Cīrsmas audita uzskaites tabula, kuri ir apstiprinājis licenzēts biotopu eksperts, lai identificētu MB. Piegādātāja treniņi atpazīt MB, licencētās biotopu eksperts līdzdalību.</p>
	Wood from Old Country Estates/ Koksne no Old Country Estates	<p>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 izejvielu piegādes līgumiem. No sekundāro izejvielu GI nepērk materiālu, kas tiek ražots no ozols, osis, goba.</p>
	Bird Nesting sites/Putnu ligzdošanas vietām	<p>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 Cīrsmas audita uzskaites tabula, kuri ir apstiprinājis licenzēts biotopu eksperts, tāpat kā labs instruments, lai noteiktu putnu ligzdošanas vietas. Piegādātāja treniņi atpazīt putnu ligzdošanas vietas, ar licencētās biotopu eksperts.</p>
2.8.1.	<p>The SBP has control systems and procedures for verifying that appropriate safeguards are put in place to protect the health and safety of forest workers SBP ir kontroles sistēmas un procedūras, lai pārbaudītu, vai attiecīgie drošības pasākumi ir ieviesti, lai aizsargātu veselību un drošību, mežā strādājošiem</p>	<p>GI approach "Work safety system". Felling's audited but table, which is approved by licensed work safety specialist, like good tool to identify work safety in fellings. GI izstrādāta "Darba drošības sistēma". Cīrsmas audita uzskaites tabula, kura ir apstiprinājis ar licencētā darba drošības speciālistu, instruments, lai noteiktu darba drošību mežizstrādē.</p>

9.2 Monitoring and outcomes

9.2.1. Primary and secondary feedstock supplies from Latvian forest properties

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 <http://latbio.lv/MBI/>, feedstock flow from risk areas is monitored.

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 the time of preparing the report, one roundwood supplier was 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.

By the time of preparing the report, there are 3 supply companies that can be recognised as SBP Compliant Biomass Suppliers to 100 %, and other 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 and secondary feedstock suppliers will correspond to the SBE requirements.

10 Detailed Findings for Indicators

Detailed information about each indicator is provided in risk assessments.

Risk assessment for Latvia is available at <https://sbp-cert.org/documents/risk-assessments/latvia>

11 Review of Report

11.1 Peer review

In 2016 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.

In 2018, peer review has not been performed.

11.2 Public or additional reviews

The Supply Base Report is publicly available on web page <http://www.latgran.com/en/policy/sustainable-biomass>. All comments received will be addressed immediately and the SBP governing body will be notified.

12 Approval of Report

Approval of Supply Base Report by senior management			
Report Prepared by:	<i>Līga Hermane</i>	<i>Quality manager</i>	<i>08.11.2019</i>
	Name	Title	Date
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:	<i>Mārtiņš Zvejnieks</i>	<i>COO</i>	<i>08.11.2019</i>
	Name	Title	Date

13 Updates

- Section 2.5 is supplemented with company's data for the period: 01.07.2018 – 30.06.2019
- Section 2.1 is supplemented with 2018 statistics.
- No purchases from Estonia and Lithuania were made in 2018, therefore descriptions of forest resources in these countries have been removed.
- Description on risk mitigation measures for primary feedstock from Estonian forest properties has been removed from the SBE sphere.

13.1 Significant changes in the Supply Base

In 2018, the delivery of wood from non-certified suppliers was started, based on the findings of the Supplier Verification Program since 2016 that the supplier's ability to provide SBP-compliant material does not depend on whether the supplier is certified. All suppliers, whether certified or not, are subjected to the same number of initial checks to determine if the supplier is able to deliver the company SBP compliant wood. Thereafter, surveillance visits are carried out at specified intervals, and the number of surveillance visits to non-certified suppliers is 2 times higher than for suppliers certified to one of the SBP-approved supply chains (PEFC or FSC).

13.2 Effectiveness of previous mitigation measures

During the reporting period (01.07.2018 - 30.06.2019) the risks mentioned in section 7 of this report are into force. Performance of risk mitigation measures at AS Graanul Invest Latvian sites (6 sites: SIA "Graanul Invest" plant, SIA "Graanul Pellets" plant, SIA "Latgran" 4 plants) are organized centrally and audit results are registered in one database considering that most suppliers supply to several group sites. In order to ensure compliance with risk mitigation measures, the following number of audits were performed within the Group during the reporting period:

13.2.1 618 habitat audits were performed. The results of the audits confirms that the risk is mitigated and the company's risk mitigation program is effective. 21% of the audits were carried out before the start of logging.

13.2.1.1 During the reporting period, there are no cases of wood coming from high conservation value forests. Four sites with potential woodland key habitat were identified where logging in these areas were not carried out. 2 sites have been identified, where logging will be planned only if the habitat expert concludes that there are no protected values in that area.

13.2.1.2 It can be concluded that the diameter restrictions imposed by the organization and the requirement for forestry companies to evaluate this aspect before performing the forestry works reduce the risk of receiving wood from sites of cultural value. There were 2 sites identified with cultural heritage values:

- one site with the status of a cultural and historical monument (castle mound) where the cutting permit is issued by The State inspection for heritage protection.
- one site with the foundations of an ancient building, the logging was done without touching them.

13.2.1.3 The results of audits show that the National Forest Service controls the nesting sites of protected birds before issuing the felling certificate as required by legislation, and that suppliers evaluate the bird nesting areas before harvesting as well. During the audits, several bird nests have been observed in 4 areas, which have been preserved according to the legislation of the Republic of Latvia, leaving the necessary protection zone.

13.2.2 During the reporting period, 76 work safety audits were performed. The results of the audit show that the risk of non-observance of work safety is considered to be low. An increasing proportion of logging work is carried out with harvesters, thus significantly reducing the risk of occupational safety for loggers. Working with hand saws has shown that workers are provided with good equipment for work.

13.2.3 Audits of the origin of the wood are carried out for all suppliers on site or at least on documentally level and observations indicate that the boundaries of the supply base are respected, the origin of the wood is controlled and the requirements of the EUTR are met.

Evaluating the results of the audits it can be concluded that the developed risk mitigation measures are effective in reducing the risks. The risk of non-compliant wood is also undermined by inspections carried out by other wood processing companies to mitigate the same risks required to maintain their certification systems

13.3 New risk ratings and mitigation measures

There is no new risks identified for supply base and mitigation measures (see below) shows the sufficient effectiveness to reduce all identified specified risks to low level:

13.3.1 Primary and secondary feedstock supplies from Latvian forest properties

	Riska	Main coments and Mitigation Measure/Galvenie komentāri un mazināšanas pasākumi
2.1.1. and 2.1.2.	<p>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</p> <p>The SBP has control systems and procedures to identify and address potential threats to forests and other areas with high conservation values 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</p>	
	Woodland Key Habitats (WKH)/ Mežu biotopi (MB)	<p>GI approach "Habitat identification system". LATBio database Felling's audited but table, which is approved by licensed biotope expert, like good tool to identify WKH. Supplier's trainings respect to WKH, by licensed biotope expert. GI izveidota "Meža biotopu identifikācijas sistēma". LATBio datu bāze Cīrsmas audita uzskaites tabula, kuri ir apstiprinājis licenzēts biotopu eksperts, lai identificētu MB. Piegādātāja treniņi atpazīt MB, licencētās biotopu eksperts līdzdalību.</p>
	Wood from Old Country Estates/ Koksne no Old Country Estates	<p>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 izejvielu piegādes līgumiem. No sekundāro izejvielu GI nepērk materiālu, kas tiek ražots no ozols, osis, goba.</p>
	Bird Nesting sites/Putnu ligzdošanas vietām	<p>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 Cīrsmas audita uzskaites tabula, kuri ir apstiprinājis licenzēts biotopu eksperts, tāpat kā labs instruments, lai noteiktu putnu ligzdošanas vietas. Piegādātāja treniņi atpazīt putnu ligzdošanas vietas, ar licencētās biotopu eksperts.</p>
2.8.1.	<p>The SBP has control systems and procedures for verifying that appropriate safeguards are put in place to protect the health and safety of forest workers SBP ir kontroles sistēmas un procedūras, lai pārbaudītu, vai attiecīgie drošības pasākumi ir ieviesti, lai aizsargātu veselību un drošību, mežā strādājošiem</p>	<p>GI approach "Work safety system". Felling's audited but table, which is approved by licensed work safety specialist, like good tool to identify work safety in fellings. GI izstrādāta "Darba drošības sistēma". Cīrsmas audita uzskaites tabula, kura ir apstiprinājis ar licencētā darba drošības speciālistu, instruments, lai noteiktu darba drošību mežizstrādē.</p>

13.4 Actual figures for feedstock over the previous 12 months

Supply Base

See Supply Base Report section "2.5 Quantity of the Supply Base". This section includes the actual figures for 2018 (period: 01.07.2018-30.06.2019).

Feedstock

Note. Reason for the volume banding is to prevent the company from publishing commercially sensitive data.

- a. Total volume of Feedstock: 200,000 – 400,000 tonnes
- b. Volume of primary feedstock: 0 – 200,000 tonnes
- c. 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 (PEFC and FSC) 0-19 %
 - Not certified to an SBP-approved Forest Management Scheme 80-100 %
- d. 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.)
- e. Volume of primary feedstock from primary forest- 0%
 - f. 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 0%
 - Primary feedstock from primary forest not certified to an SBP-approved Forest Management Scheme 0%
 - g. Volume of secondary feedstock: sawdust and wood chips (sawmill residues) feedstock as production waste from producers comes from Latvia (13,54%) and Belarus (86,46%): 0 – 200,000 tonnes
 - h. Volume of tertiary feedstock: 0 tonnes

13.5 Projected figures for feedstock over the next 12 months

Feedstock

Note. Reason for the volume banding is to prevent the company from publishing commercially sensitive data.

- a. Total volume of Feedstock: 200,000 – 400,000 tonnes
- b. Volume of primary feedstock: 0 – 200,000 tonnes
- c. 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.)
- d. Volume of primary feedstock from primary forest- 0%
- e. Volume of secondary feedstock: sawdust and wood chips (sawmill residues) feedstock as production waste from producers comes from Latvia and Belarus: 0 – 200,000 tonnes
- f. Volume of tertiary feedstock: 0 tonnes.