



Supply Base Report: Lumbar OÜ

Main (Initial) Audit

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Completed in accordance with the Supply Base Report Template Version 1.4

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

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2 Description of the Supply Base

2.1 General description

Feedstock types: Primary

Includes Supply Base evaluation (SBE): Yes

Feedstock origin (countries): Estonia

2.2 Description of countries included in the Supply Base

Country: Estonia

Area/Region: Europe

Exclusions: No

Lumbar OÃœ is an Estonian company specialised in the production of wood chips. Our raw material is sourced from various Estonian suppliers, including forest stocking companies and forest owners, agricultural coÃœoperatives, forestry products intermediaries. The primary material comes from roundwood, tops, branches and brushwood. The material originates from a variety of forests, where clear cutting, salvage cutting or thinning have been undertaken according to management plans. Lumbar OÃœ was issued with an FSC certificate in 2015.

Table 1. Overview of Feedstock profile (01.01.2020-Ãœ31.12.2020)

Feedstock product groups	Estimated Proportion	Indicative number of suppliers	Species mix
Controlled Feedstock (primary)	100%	106	Picea abies, Pinus Sylvestris, Alnus glutinosa, Alnus incana, Populus tremula, Betula pendula, Betula pubescens, Fraxinus excelsior, Tilia cordata, Salix spp.
SBP- compliant Primary Feedstock	0%	0	Picea abies, Pinus Sylvestris, Alnus glutinosa, Alnus incana, Populus tremula, Betula pendula, Betula pubescens, Fraxinus excelsior, Tilia cordata, Salix spp.
SBP-compliant	0%	0	Picea abies, Pinus Sylvestris, Alnus

Secondary Feedstock			glutinosa, Alnus incana, Populus tremula, Betula pendula, Betula pubescens, Fraxinus excelsior, Tilia cordata, Salix spp.
SBP non-compliant	0%	0	Picea abies, Pinus Sylvestris, Alnus glutinosa, Alnus incana, Populus tremula, Betula pendula, Betula pubescens, Fraxinus excelsior, Tilia cordata, Salix spp.

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 stakeholders¹. The Estonian legislation provides strict outlines in respect to the usage of forestry land and the Estonian Forestry Development Plan 2020² has clear objectives and strategies in place to ensure the forestland is protected up to the standards of sustainable forest management techniques. The Ministry of the Environment coordinates the fulfilment of state duties in forestry. The implementation of environmental policies and its supervision are carried out by two separate entities operating under its governance. The Estonian Environmental Board monitors all of the work carried out in Estonia's forests whereas the Environmental Inspectorate exercises supervision in all areas of environmental protection.

The forest is defined in the Forest Act. There are three main forest categories are described in this legislation: commercial forest, protection forest and protected forests. According to the ownership, forests are also divided into private forests, municipality forests and state owned forests. The state owned forest represent approximately 40% of the total forest area³ 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 addressed⁴. 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. Overall there is 1 192 273 ha⁵ of FSC certified and 1 296 002 ha⁶ of PEFC certified forest.

Currently more than 2 330 800 ha, equal to 47,4%⁷ of the Estonian land territory, is covered by forest. Forestry Development Plan 2012-2020 and Yearbook Forest 2018, 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 15 mill m³ per year⁷. The amount is in line with sustainable development principle when the cutting rate doesn't exceeds the annual increment and gives the potential to meet the long-term the economic, social and environmental needs. According to the Forestry Development Plan 2012-2020 the sustainable cutting rate is 12-15 mil ha per year.

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

Figure 2 The distribution of growing stock by tree species (Yearbook Forest 2018).

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 database⁸.

Area of protected forests accounts to 24,6% of the total forest area whereas 13,2% 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 Act⁹. Estonia has signed the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in 1992¹⁰ and joined the International Union for Conservation of Nature (IUCN) in 2007¹¹. There are no CITES or IUCN protected tree species naturally growing in Estonia.

According to the Forestry Yearbook 2018 the wood, paper and furniture industry (871,9 million euro) contributed 26.7% to the total sector providing 4.2% of the total value added. Forestry accounted for 1.0% of the value added. Comparison to the whole wood industry fuelwood constitutes 11% of the marketshare, but biomass part is even less from that. In 2018 the felling volume according to the national expert estimation was 12,5 million m³.

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.

¹ http://europa.eu/about-eu/countries/member-countries/estonia/index_en.htm

² [Original title: "Eesti metsanduse arengukava aastani 2020"; approved by Estonians parliament decision nr 909 OE 15. February 2011.a](#)

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

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

⁵ <https://fsc-int.maps.arcgis.com/apps/webappviewer/index.html?id=06188ad39e5344db96a4a181e135c393>

⁶ <https://www.pefc.org/>

⁷ [Yearbook Forest 2018 \(all key figures, graphs and tables are bilingual\)](#)

⁸ <http://register.metsad.ee/avalik/>

⁹ <https://www.riigiteataja.ee/en/eli/517062015004/consolide>

¹⁰ <http://www.envir.ee/et/cites>

¹¹ <http://www.envir.ee/et/iucn>

2.3 Actions taken to promote certification amongst feedstock supplier

Lumbar OÃœ is promoting FSC and PEFC certification for Sustainable Forest Management. We explain to our suppliers its criteria and importance and give priority to FSC or PEFC certified suppliers. Lumbar OÃœ has prepared a supplierâ€™s code of conduct that will be signed with all suppliers. Amongst other this document promotes legal and sustainable forest management and excludes timber from undefined sources.

2.4 Quantification of the Supply Base

Supply Base

- a. **Total Supply Base area (million ha):** 2,33
- b. **Tenure by type (million ha):**1.22 (Public), 1.11 (Privately owned)
- c. **Forest by type (million ha):**2.33 (Temperate)
- d. **Forest by management type (million ha):**2.33 (Managed natural)
- e. **Certified forest by scheme (million ha):**1.19 (FSC), 1.29 (PEFC)

Describe the harvesting type which best describes how your material is sourced: Clearcutting

Explanation: All feedstock used is sourced in Estonia, where the maximum size of clearcuttings is restricted by the Forest Act with up to 7 hectares. The majority of the harvesting works are carried out by harvesters.

Was the forest in the Supply Base managed for a purpose other than for energy markets? Yes - Majority

Explanation: In Estonia from where all primary feedstock is sourced, energy markets do not compete for feedstock with other wood based industry. Pulp wood and saw timber is more expensive and forest owners and forest management companies sell better quality material to those industries. Energy markets are supplied with low quality forest products.

For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling? Yes - Majority

Explanation: In Estonia from where all primary feedstock the Forest Act obliges forest owners to renew its forest land within five years after harvest and in some forest types where growing conditions are worse, within ten years after harvest.

Was the feedstock used in the biomass removed from a forest as part of a pest/disease control measure or a salvage operation? No

Explanation: N/A

Feedstock

Reporting period from: 2020-01-01

Reporting period to: 2020-12-31

- a. **Total volume of Feedstock:** 400,000-600,000 m3

- b. Volume of primary feedstock:** 400,000-600,000 m³
- c. List percentage of primary feedstock, by the following categories.**
- Certified to an SBP-approved Forest Management Scheme: 0%
 - Not certified to an SBP-approved Forest Management Scheme: 80% - 100%
- d. List of all the species in primary feedstock, including scientific name::**

Picea abies(European spruce)

Pinus sylvestris(Scots pine)

Alnus glutinosa(Common alder)

Alnus incana(Grey alder)

Populus tremula(European aspen)

Betula pendula(European white birch)

Betula pubescens(European hairy birch)

Fraxinus excelsior(European ash)

Tilia cordata(Common linden)

Salix spp(willow)

- e. Is any of the feedstock used likely to have come from protected or threatened species?** No
- Name of species: N/A
 - Biomass proportion, by weight, that is likely to be composed of that species (%): N/A
- f. Hardwood (i.e. broadleaf trees): specify proportion of biomass from (%):** 90,00
- g. Softwood (i.e. coniferous trees): specify proportion of biomass from (%):** 10,00
- h. Proportion of biomass composed of or derived from saw logs (%):** 0,00
- i. Specify the local regulations or industry standards that define saw logs:** The general requirements are in line with the State Forest Saw Logs standard available at: <https://adr.rmk.ee/dokument/57396>
- j. Roundwood from final fellings from forests with > 40 yr rotation times - Average % volume of fellings delivered to BP (%):** 5,00
- k. Volume of primary feedstock from primary forest:** 0 m³
- l. List percentage of primary feedstock from primary forest, 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: 80% - 100%
- m. Volume of secondary feedstock:** 0 N/A
- Physical form of the feedstock: N/A
- n. Volume of tertiary feedstock:** 0 N/A
- Physical form of the feedstock: N/A

Proportion of feedstock sourced per type of claim during the reporting period

Feedstock type	Sourced by using Supply Base Evaluation (SBE) %	FSC %	PEFC %	SFI %
Primary	100,00	0,00	0,00	0,00
Secondary	0,00	0,00	0,00	0,00
Tertiary	0,00	0,00	0,00	0,00
Other	0,00	0,00	0,00	0,00

3 Requirement for a Supply Base Evaluation

Is Supply Base Evaluation (SBE) is completed? Yes

The demand for SBP - compliant biomass is exceeding the volumes of FSC/PEFC certified feedstock that is available for woodchips production in the Baltic region. To meet the demand Lumbar OÃœ will undertake a supply base evaluation for primary feedstock that is originating from Estonia according to the SBP Framework Standard 1: Feedstock Compliance Standard and Standard 2: Verification of SBP - compliant Feedstock.

The risk assessment of the SBE is based on the SBP endorsed Regional Risk Assessment for Estonia. This assessment has been approved by SBP secretariat 22.04.2016 and is publically available on at: <https://sbp-cert.org/wp-content/uploads/2018/12/SBP-endorsed-Regional-Risk-Assessment-for-Estonia.pdf>

The scope of the SBE was chosen based on the availability of the SBP - endorsed Regional Risk assessments whereas the possibility to mitigate the identified â€œspecified riskâ€• with reasonable efforts was considered.

4 Supply Base Evaluation

4.1 Scope

Feedstock types included in SBE: Primary

SBP-endorsed Regional Risk Assessments used: Estonia

List of countries and regions included in the SBE:

CountryEstonia

Indicator with specified risk in the risk assessment used2.1.2 The BP has implemented appropriate control systems and procedures to identify and address potential threats to forests and other areas with high conservation values from forest management activities.

WKH are forest habitats with high probability of present occurrence of endangered, vulnerable and rare species. WKH system is a tool to address high conservation value forest habitats in managed forests thus they are the primary mechanism for protection of ecologically valuable areas which are located within commercially managed forests. According to the Estonian legislation WKHs protection is optional for private forest owners. They can sign a contract with state and protect the WKH. In this case, the state pays compensation to the owner for protecting the WKH. If private forest owner do not want to protect the WKH then it is allowed to cut it. It is possible to determine the location of WKHs in Public Forest Registry and in case felling permit is issued it is possible to see if the material is cut from WKH or not. In case the fellings are done without felling permit (it is allowed to do small scale sanitary cutting without felling permit) then on site visit is only way to see if the WKH is untouched or not. Please see section 7 for a description of the detailed mitigation actions. In state forest and in FSC and/or PEFC certified private forest and in private forests where WKH contract has been signed, WKH are protected.

4.2 Justification

Lumbar OÃœ will rely on SBP-endorsed Regional Risk Assessment for Estonia (2016) that meets the requirements of SBP Framework Standard 1 and 2 and has been approved by the SBP secretariat on 22.04.2016. Lumbar OÃœ agrees with all the findings, conclusions and mitigation measures set out in the report and will not undertake an independent risk assessment.

4.3 Results of risk assessment and Supplier Verification

Programme

The risk evaluation and mitigation will be based on SBP - endorsed Regional Risk Assessment for Estonia (2016), where the only indicator evaluated as "specified risk" was indicator 2.1.2: "The BP has control systems and procedures to identify and address potential threats to forests and other areas with high conservation values from forest management activities". According to the Estonian legislation, protection of Woodland Key Habitats (WKH) is optional for private forest owners. They can choose to sign a

contract with the state to protect WKH. In this case the state pays compensation to the owner for the protection of WKH. If the private forest owner does not want to protect WKH, the agreement ends and they are then allowed to cut it. In state forest and in FSC/PEFC certified private forest WKH are protected. In case where the sourced material derives from private forests, it is important to know exactly from where the material was cut (FMU, sub-compartment). Public databases that can be used to control if the material comes from WKH or not, are available. In cases where no felling permits are issued and the FMU contains WKH, an on-site visit is required if material is subject to the SBE. All other indicators were assigned as "low risk". For a more detail please refer to the SBP-endorsed Regional Risk Assessment for Estonia (2016). According to article 14.1 of the SBP Framework Standard 2: Verification of SBP-compliant Feedstock a Supplier Verification Programme will not be undertaken, as none of the indicators in the final risk assessment were assessed as "unspecified risk". The need for a Supplier Verification Programme will be re-evaluated during the review of the risk assessment.

4.4 Conclusion

Based on the information available during the regional risk assessment process, the level of risk for each of the criteria was chosen. For Estonia all except one criteria were assigned low risk. The only "unspecified risk" was associated with the indicator 2.1.2: "The BP has control systems and procedures to verify that potential threats of forest management activities to the HCVs are identified and safeguards are implemented to protect them". The indicator was assigned as "unspecified risk" due to the protection status of WKHs. Based on the findings of the SBE it can be concluded: as long as the risks associated with the indicator 2.1.2 are mitigated, feedstock from Estonia is low risk and is meeting the requirements for SBP-compliant feedstock. For detailed mitigation measures please refer to Chapter 7 of the SBR.

5 Supply Base Evaluation process

In Estonia the supply base evaluation process entails the verification of accompanying documents, purchase agreements, invoices and delivery documents to identify the origins of SBP material. The suppliers sign a contract stating they do not source from HCV areas. In addition, public databases are consulted to avoid sourcing from WKHs: <http://geoportaal.maaamet.ee/>, <https://register.metsad.ee/>, <https://vep.lank.ee/>, the key habitat database of the Estonian Environment Agency, updated at least twice a year and the Land Registry helps to identify land ownership.

When necessary, an inspection is carried out in harvesting sites to identify HCV areas as well as an on-site audit.

To avoid risks related to raw material and forestry activities, Lumbar OÃœ inspects, together with suppliers, the origin of all primary raw material and requirements at logging. For detailed supply base evaluation and mitigation measures please refer to Chapter 7 of the SBR.

6 Stakeholder consultation

The first stakeholder consultation round of the RRA was completed from 26.03.2015 - 26.04.2015 and the second round from 05.05.2015 - 20.05.2015. The information about the risk assessment process development, along with the draft risk assessment, was sent out to all key stakeholders. The list of stakeholders can be seen in Annex 4 of the RRA. Three stakeholders, the Estonian Fund for Nature (ELF), Graanul Invest AS and the Estonian Forest and Wood Industries Association (EMPL) provided their feedback.

During the first consultation period (26.03.2015 – 26.04.2015) SBP received comments and additional information from several stakeholders and from state institutions. Based on this information some of the specified risk designations were changed to low risk. The second stakeholder consultation period was from 05.05.2015 to 20.05.2015. During this consultation, some additional comments were raised. A detailed description of the situation for each criteria is presented in Annex 1 of the RRA along with the chosen level of risk, which was based on the information provided.

SBP secretariat conducted an additional round of stakeholder consultations from 17.09.2015 to 16.10.2015. The results of these consultation process are available at: <https://sbp-cert.org/documents/standards-documents/risk-assessments/estonia/>

Lumbar OÜ conducted its stakeholder consultation process of the SBE from 27.10.2020-27.11.2020, by e-mail message to local municipalities, state institutions and authorities, State Forest Management Centre, Foundation Private Forest Centre, Estonian Private Forest Association, FSC Estonia, PEFC Estonia, Estonian Forest and Wood Industries Association, Estonian Forest Society and to Loodusaeg™'s mailing list covering app 1000 followers including various nature conservation and protection organisations. During the consultation no comments from the stakeholders were received.

In addition NEPcon, acting as the SBP approved certification body of Lumbar OÜ, will undertake an additional consultation process prior to the SBP audit.

6.1 Response to stakeholder comments

N/A

7 Mitigation measures

7.1 Mitigation measures

Country: Estonia

Specified risk indicator: 2.1.2 The BP has implemented appropriate control systems and procedures to identify and address potential threats to forests and other areas with high conservation values from forest management activities.

WKH are forest habitats with high probability of present occurrence of endangered, vulnerable and rare species. WKH system is a tool to address high conservation value forest habitats in managed forests thus they are the primary mechanism for protection of ecologically valuable areas which are located within commercially managed forests. According to the Estonian legislation WKHs protection is optional for private forest owners. They can sign a contract with state and protect the WKH. In this case, the state pays compensation to the owner for protecting the WKH. If private forest owner do not want to protect the WKH then it is allowed to cut it. It is possible to determine the location of WKHs in Public Forest Registry and in case felling permit is issued it is possible to see if the material is cut from WKH or not. In case the fellings are done without felling permit (it is allowed to do small scale sanitary cutting without felling permit) then on site visit is only way to see if the WKH is untouched or not. Please see section 7 for a description of the detailed mitigation actions. In state forest and in FSC and/or PEFC certified private forest and in private forests where WKH contract has been signed, WKH are protected.

The mitigation measures described below will only be applied for feedstock that is in the scope of the SBE as described in section 4.1. The responsible person for the implementation of the SBE is the Executive Director of Lumbar OÃœ who is also the overall responsible person for the company's FSC and SBP certification systems.

Primary feedstock

All deliveries of primary feedstock that has been harvested in Estonia, but is not FSC or PEFC certified, Lumbar OÃœ will verify that it has not been sourced from WKHs. Additional control procedures, e.g. procedures according to FSC-STD-40-005: FSC Standard for Company Evaluation of FSC Controlled Wood, are applied if applicable. All feedstock subject to SBE must meet prior the evaluation at least SBP-approved Controlled Feedstock System requirements.

Lumbar OÃœ will use the delivery documents, a list of approved suppliers and publicly available databases (e.g. maps at: <http://register.metsad.ee/avalik/> or at least biannually renewed databases from competent authorities¹²) to verify that the delivered primary feedstock has not been sourced from WKHs. During the reception and registration of primary feedstock, will be carried out the following control procedure within the SBE:

Has the supplier signed an agreement and committed not to supply wood from WKHs?

1) Has the supplier signed an agreement and committed not to supply wood from WKHs?

If yes, go to 2

If no, the products cannot be sourced.

2) Can the products be traced back to the logging site in forest?

If yes, go to 3

If no, the products cannot be sourced.

3) Is there a felling permit issued?

If yes, go to 5

If no, go to 4

4) Fellingâ€™s from not woodlands and without felling permit (according to forest act)

Is there is no WKHs on the FMU according to available information: the products can be sourced

Is there is a WKHs on FMU an on-site the products cannot be sourced as SBP-compliant

5) Does the logging site defined in the felling permit, match with the WKH location?

If yes, the products cannot be sourced as SBP-compliant

If no, the products can be sourced

The control procedures carried out by the regional manager of feedstock delivered both with and without a felling permit are described under section 7 The regional manager shall forward approved feedstock, verification and data to the recipient of the feedstock, who then carries out a control of origin on delivery. The recipient shall compare the data on delivery documents to that in the felling permit and other previously databases. No goods are to be accepted in case of irregularities or false data. All instances, were primary feedstock from WKHs have been offered will be recorded in a register.

¹² The Environmental Agency of Estonia is the competent authority, in charge of the KH database. The database is shared with SBE suppliers.

7.2 Monitoring and outcomes

WKHs can be checked from the Environment Agency database. Valid forest notices are listed in the Forest Registry database. Proof of ownership is checked in the Land Register. The regional manager is responsible for all the checks. Felling permits can be checked against WKHs. In case of smaller scale loggings, not requiring a felling permit and when a WKH is concerned, an on-site audit must be carried out, to verify the situation in and integrity of the WKH. The on-site audit shall be performed by the regional manager. WKH material is verified on-site on the basis of the forestry plan and forest notice and according to the felling allocation. The regional manager shall compile a separate report on every control visit, including a summary of the results of the visual inspection. The regional manager will check all deliveries without an FSC, to guarantee, that they are not sourced from a WKH. Documents of origin and databases mentioned above are used for the purpose. The regional manager conducts regular controls of sourcing sites, to gather information on the nature and processing of material and meets suppliers, after which a control visit report will be compiled. These on-site controls also serve the purpose of making sure, that the technical equipment used has not harmed the ecosystem or natural balance in the sourcing site. Lumbar OÃœ will keep register of all cases where material originating from WKH been offered and the suppliers are in violation with the code of conduct and feedstock purchase agreement. An investigation in all these cases will be carried out and the reason of such deliveries will be analysed. Suppliers who violate these terms repeatedly or on purpose and are not willing to take measures to avoid sourcing material from WKHs in the future will be excluded from the suppliers list and all deliveries will be stopped latest with the implementation of the FSC-STD-40-005 V3-1. The Code of Conduct is available on company web-site and reference in feedstock purchase agreement. The results of these findings will be reviewed and updated annually with the SBR along with other available data about the protection status of WKHs in Estonia. â€f The controls by the regional manager have not shown any instances of material that has been sourced from WKH areas or that is of dubious origin. All documents are inspected for each client and each patch, on-site checks are conducted when necessary. Lumbar OÃœ does not cooperate with suppliers who refuse to comply with the SBP supplier requirements.

8 Detailed findings for indicators

Detailed findings for each Indicator are given in Annex 1 in case the Regional Risk Assessment (RRA) is not used.

Is RRA used? Yes

9 Review of report

9.1 Peer review

The SBR has been reviewed and signed by senior management. 21.12.2020 this SBR was reviewed by Henrik Välja a representative of the Estonian Timber Association.

9.2 Public or additional reviews

The SBR is publicly available at Lumbar OÜ's homepage (<http://lumbar.ee/>). Received comments will be addressed and the certification body will be notified.

10 Approval of report

Approval of Supply Base Report by senior management			
Report Prepared by:	Janek Rivimets	Quality and Environmental Manager	2020-10-27
	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:	Anni Mõts	Member of the Board	2020-10-27
	Name	Title	Date

Annex 1: Detailed findings for Supply Base Evaluation indicators

N/A