



Supply Base Report: United Loggers OÜ

Fourth Surveillance Audit

www.sbp-cert.org



The promise of good biomass



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

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; re-published 3 April 2020

Version 1.4 published 22 October 2020

Contents

- 1 Overview**
 - 2 Description of the Supply Base**
 - 2.1 General description
 - 2.2 Description of countries included in the Supply Base
 - 2.3 Actions taken to promote certification amongst feedstock supplier
 - 2.4 Quantification of the Supply Base
 - 3 Requirement for a Supply Base Evaluation**
 - 4 Supply Base Evaluation**
 - 4.1 Scope
 - 4.2 Justification
 - 4.3 Results of risk assessment and Supplier Verification Programme
 - 4.4 Conclusion
 - 5 Supply Base Evaluation process**
 - 6 Stakeholder consultation**
 - 6.1 Response to stakeholder comments
 - 7 Mitigation measures**
 - 7.1 Mitigation measures
 - 7.2 Monitoring and outcomes
 - 8 Detailed findings for indicators**
 - 9 Review of report**
 - 9.1 Peer review
 - 9.2 Public or additional reviews
 - 10 Approval of report**
- Annex 1: Detailed findings for Supply Base Evaluation indicators**

1 Overview

Producer name: United Loggers OÜ

Producer address: Saksa küla, Rätsepa talu, 79005 Raplamaa, Kehtna vald, Estonia

SBP Certificate Code: SBP-01-82

Geographic position: 58.945087, 24.891750

Primary contact: N/A, N/A,info@united-loggers.ee

Company website: www.united-loggers.ee

Date report finalised: 18 Feb 2021

Close of last CB audit: 19 Feb 2021

Name of CB: NEPCon OÜ

SBP Standard(s) used: SBP Standard 1: Feedstock Compliance Standard, SBP Standard 2: Verification of SBP-compliant Feedstock, SBP Standard 4: Chain of Custody, SBP Standard 5: Collection and Communication of Data Instruction

Weblink to Standard(s) used: <https://sbp-cert.org/documents/standards-documents/standards>

SBP Endorsed Regional Risk Assessment: Estonia

Weblink to SBR on Company website: http://www.united-loggers.ee

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

Feedstock types: Primary

Includes Supply Base evaluation (SBE): Yes

Feedstock origin (countries): Estonia, Latvia, Poland, Germany

2.2 Description of countries included in the Supply Base

Country: Estonia

Area/Region: All country

Exclusions: No

Estonia has been a member of the European Union since 2004 and Estonian legislation is in conformity with the Community acquis. National legislative acts refer to the international legal framework and law-making is based on democratic principles, e.g. stakeholder engagement¹. Almost half of Estonian mainland - 2.1 million hectares - is covered by forests. The usage of forests and woodlands is regulated by law. The Estonian Forestry Development Plan 2020² sets out the strategy and targets for the protection and sustainable management of forests and woodlands. Departments in the Ministry of the Environment coordinate and monitor forest management and legislative compliance in the sector. The Environmental Board carries out the national policy for the use and protection of natural resource and the Environmental Inspectorate exercises supervision of environmental protection.

The Forest Act divides forests into managed, partially managed and protected forests. Forests are either in state, local government or private ownership. Around 40% of all forests and forest land belongs to the state (as of 1 July 2019, the forest register contained a forest inventory data on the allocations of 2 048 319 ha of forest land, of which 976 718 ha were private forest land and

1,047,503 ha of state forest land)³. State forest land has been certified according to the FSC and PEFC land management and supply chain standards. The State Forest Management Centre, aiming at sustainable and effective forest management, is responsible for managing state forests. Continuous forest inventory data monitoring and renewal of forest maps enable forest management planning⁴.

During the last decade, the annual felling volume has been between 7-11 million scbm⁵. The annual increase, according to the Forest Management Development Plan, is between 12-15 million scbm. These figures demonstrate that forest management has been sustainable and that there is enough resource and potential. This provides assurance for achieving economic, environmental and social goals in the long term perspective.

1 https://europa.eu/european-union/law_et

2 Original title: "Eesti metsanduse arengukava aastani 2020"; approved <https://europa.eu/about-eu/countries/member-countries/estonia/index.en.htm> by Estonian parliament decision nr 909 OE 15. february 2011 http://www.envir.ee/sites/default/files/elfinder/article_files/mak2020vastuvoetud.pdf

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

https://www.keskkonnaagentuur.ee/sites/default/files/02_metsaomand_07.04.20_0.pdf

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

5 Year <http://www.rmk.ee/organisation/operating-areasbook> Forest 2013
http://www.keskonnainfo.ee/failid/Mets_2013.pdf (all key figures, graphs and tables are bilingual)

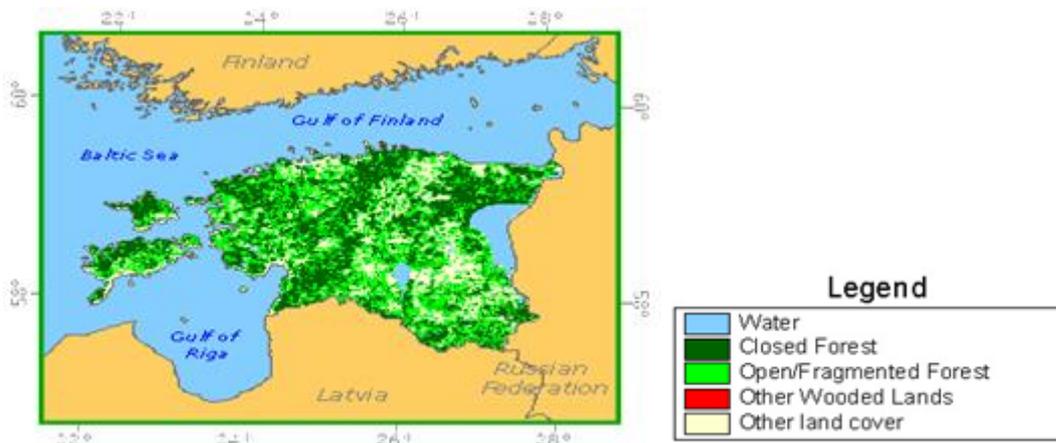


Figure 1. Forest cover of Estonia (<http://www.fao.org/forestry/country/en/est/>)

The distribution of growing stock by tree species in Estonia is showing on figure 2.

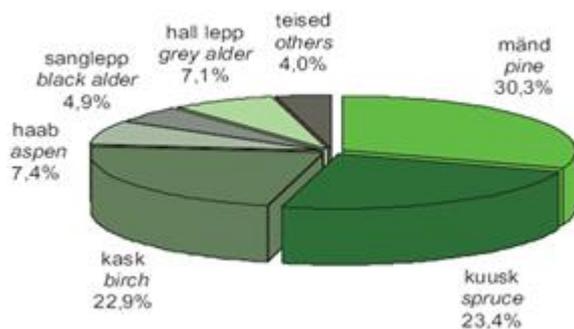


Figure 2. The distribution of growing stock by tree species (Yearbook Forest 2013)

A forest management plan must be drawn up for forest management and felling, serving as a basis for the Environmental Board to issue felling licences. All relevant data can be accessed through a public database⁶. 23% of all forest land is under protected forest, the majority of it in state ownership. Nature Conservation Act regulates the use of natural resources promoting biodiversity⁷ in Estonian forests. Estonia signed the 1973 Convention on International Trade in Endangered Species of Wild Flora and Fauna

(CITES) in 1992⁸ and joined the World Conservation Union IUCN (International Union for Conservation of Nature) in 2007⁹. No tree species under protection by CITES or IUCN grow naturally in Estonia.

During last 4y energy balance of wood fuels are btw 5,5-6m m3 *10

There was ca 20 supplier from Estonia during audit period.

6 <http://register.metsad.ee/avalik/>

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

8 <http://www.envir.ee/et/cites>

9 <http://www.envir.ee/et/iucn>

10 https://www.keskkonnaagentuur.ee/sites/default/files/mets2018_0.pdf

Country:Latvia

Area/Region: West area of country

Exclusions: No

Latvia is a parliamentary democracy and since 2004 a Member State of the European Union. 54% or 3,22 million ha of the territory is covered by forests. 1,6 million ha of the forests are in state ownership, 1,5 million ha are private.

The area under forests is expanding, partly through the course of nature, partly due to planting activities on infertile lands unsuitable for agriculture. During the last decade, timber production volumes have remained between 9 and 13 million cubic meters.

The composition of forests:

pine 34,3%

spruce 18,0%

birch 30,8%

alder (black and grey) 10%

aspen 5,4%

The forestry sector is managed by the Latvian Ministry for Agriculture. In cooperation with other interest groups they draft forestry policy in general, but also develop forestry strategies and legislative acts on forest management, the exploitation of forests, nature protection and hunting. The National Forestry Service, under the Ministry of Agriculture, is responsible for the execution of requirements set down in legislation. The management of forests is the responsibility of the Latvian State Forest PLC, a public limited company created in 1999. Their task is to enforce conservation and forest expansion measures in the interests of the state.

Forestry, timber and furniture industry accounted for 6% of GDP in 2012.

There are 674 protected nature preservation areas in Latvia. Some of these are part of the Natura 2000 network and most of them are on state lands. There are also micro-conservation areas to protect rare and endangered species and biotopes, according to the National Forestry Service, 40 595 ha were covered by such areas in 2015. The process of identifying and protecting endangered areas is an ongoing one, but there are also requirements regulating forest management that are compulsory for all actors in forestry to protect biodiversity. Such requirements include, for example, the requirement to keep certain old and big trees, to maintain dead trees, undergrowth, shrubs and flora to preserve habitat diversity. Latvia signed the CITES Convention in 1997 and its requirements have been taken into account in forest management, although no tree species from the CITES list grow in Latvia.

Around 8% or 293 000 ha (2012 data) of forest land are identified as recreational areas. Observation towers, nature study trails, nature and culture related objects, rest areas are only a few examples of the infrastructure made available for the population to enjoy. Such areas are mainly on state lands and are often in national parks (under strict protection), nature reserves, areas under protection, in regions under standing timber, in areas with geological or geomorphological objects on them or in smaller, local protected areas. The management of Baltic Sea dunes, protected areas surrounding towns and forests within town limits is in the hands of the Nature Protection Service, operating under the Ministry of Nature Protection and Regional Development.

All of the Latvian State Forest and part of private forests have an FSC and PEFC certificate. 1 022 196 ha of the forests carry an FSC certificate and 1 700 889 ha a PEFC certificate¹¹. Potential nature protection areas can be checked on the Latbio Potential Biotope Database website¹². For any additional information please visit the Natural Data Management System "Ozols" website of the Nature Protection Board¹³.

During last 4y energy balance of wood fuels are btw 7-9m m3 *14

There was no suppliers from Latvia during audit period

¹¹ www.lvm.lv

¹² www.latbio.lv/MBI

¹³ http://www.daba.gov.lv/public/lat/dati1/dabas_datu_parvaldibas_sistema_ozols/

*14 Indufor Area Analyses in Latvia May7 2020

Country:Poland

Area/Region: North area of country

Exclusions: No

Poland is a parliamentary democracy and joined the European Union in 2004. 29.1% or 9088 thousand hectares of Polish territory is covered in forests and that area is growing. Of the forests, 52.6% is coniferous forest and 47.4 forests of deciduous trees. Pines dominate the flat- and more fertile lands, spruce more mountainous areas. The domination of coniferous trees, especially in fertile area and often as monocultural coppice, is a direct result of once popular regeneration felling. The past 20 years have seen a restructuring of coppice areas and giving up of renewal felling.

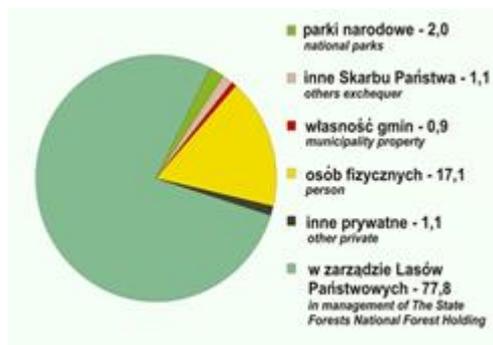


Figure 3. Forest land according to ownership and function

Share of species in Polish forests:

Pine 70%

Oak 7,3%

Birch 7%

Spruce 5.5%

Beech 5%

Alder 4.4%

Silver fir 2%

Other broad leaved species (maple, poplar, etc) 1%

A dominant part of Polish forests are public forests (82.5%), 94% (7 million hectares) of that is in state ownership, 16.4% in private ownership (1.6 million hectares). The principles of forest management are laid down in the Forest Act of 1991 (Ustawa o lasach). This Act regulates all forests, regardless of form of ownership. State forests are under the jurisdiction of the Ministry for the Environment, private forests of county heads. The state forests are managed by the National Forest Trust (PGL LP), lead by its General Manager with help from the members of the State Forest Board and heads of the 17 forestry areas. Forests are divided into districts, managed by forest inspectors. Inspectors are independent in their forest management decisions, but follow forest management plans. There are 428 such districts in the country. Poland has 23 national parks, covering an area of 300 000 hectares or roughly 1% of the national territory. 60% of the parks are forests. At the end of 2008, there were 1200 protected zones in the state forests, totalling about 120 000 hectares. Poland is one of the Natura 2000 European Committee members. 2.2 million hectares were SAC certified areas – 29% of state forests. 1.1 million hectares were certified as protected bird habitat (SPA approval) – 15.1% of

forests¹⁵.

Energy balance of wood and wood waste from the forests and orchards in Poland is ca 9m tons. *16

There was no suppliers in Poland during audit period.

CITES species can be found under this link:

https://checklist.cites.org/#/en/search/country_ids%5B%5D=75&output_layout=alphabetical&level_of_listing=0&show_synonyms=1&show_author=1&show_english=1&show_spanish=1&show_french=1&scientific_name=&page=1&per_page=20

15 https://www.metsaring.files.wordpress.com/2012/03/14_ypef-booklet-2011-12_poola.pdf

*16 https://www.flandersinvestmentandtrade.com/export/sites/trade/files/market_studies/2019-Poland-Renewable_Energy.pdf

Country:Germany

Area/Region: Lower Saxony and Hesse

Exclusions: No

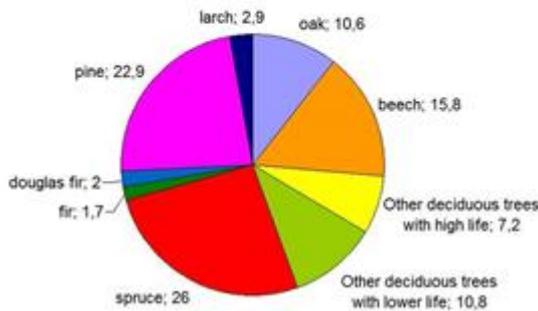
The Federal Republic of Germany, a member of the European Communities already since 1958, is a country with one of the biggest share of forests in Europe. Forests spread over 11.1 million hectares and cover a third of the territory of the country, 2/3 of which are coniferous and 1/3 deciduous forests. The forests are growing year-on-year.

The Länder own 29% and the federal government 5% (3,8 milj ha), municipalities 20% (2,2 milj ha) of the forests and 46% (5,1 milj ha) are in private ownership¹⁷¹. There are around 2 million private forest owners in the country, the average of 2.4 ha per inhabitant. 53 million hectares of forest were harvested in 2006.

Both German federal legislation and forestry acts guarantee a sustainable ecological, economic and social management of the forests. In most Länder, the state forest is divided between regional forestry authorities that are made up of districts ranging between 1.500 – 3.000 hectares. These districts are presided over by a forester. The main tasks of the regional forestry authorities entail the management of assets and the economic side of forest management, including timber production as well as the acquisition and marketing of timber and non-timber products. They also have to maintain the protection and recreational function of forests. Around 1.2 million people are employed in Germany in the forestry sector, for example in forestry authorities, in scientific institutions, sawmills and the paper industry. There are various trade unions and interest groups formed in the sector.

There are around 71 species of trees in modern Germany. The most widespread are scots pine (*Pinus sylvestris*), European spruce (*Picea abies*), European beech (*Fagus sylvatica*) and oak (*Quercus* ssp).

tree species proportions
(%, according to the 3rd National Forest Inventory 2014)



<https://www.forstwirtschaft-in-deutschland.de/german-forestry/forest-facts/?L=1>

Figure 4. Tree species proportions (% , according to the 3rd National Forest Inventory 2014)

Germany's forests have been managed according to sustainability principles for over 200 years already. Sustainable management has a very low impact on the structure of forests and has a positive effect on the structure of the eco-system. The sustainability principle has been enshrined in the federal forest act and in other forestry legislation. The frontrunner of introducing sustainable forest management was Hans Carl von Carlowitz, who in his book "Sylvicultura oeconomica" (1713) called for a direct link between logging and the growth of forests - you can harvest only as much as you plant and grow. This requirement is still in place today.

There are 14 national parks in Germany. The first of them, the Bavarian National Park, was established in 1970. The total territory covered by national parks stands at 194 182 ha or ca 0,54 % of the territory. 5% of German forests (11.1 million ha) is nature reserves.

Natura 2000 areas were brought in by legislation in 1998. There are 4 621 of them, spreading over three biogeographical areas (the Alps, the Atlantic and continental areas). 57% of German forests are protected areas, where the recreational functions of forests are at the forefront and the focus is on the general productivity and functional capacity of the natural environment. 8.7% of the forests have a FSC certificate and 66,7 % are PEFC forests.

Germany signed the CITIES convention already in 1978, although none of the listed tree species grows on its territory¹⁷.

Total bioenergy consumption in Germany, included woody bioenergy was on y16 26,2MToe *18

There was 1 supplier during audit period

171 https://metsaring.files.wordpress.com/2012/03/8_ypef-booklet-2011-12_saksamaa.pdf

17http://checklist.cites.org/#/en/search/country_ids%5B%5D=23&output_layout=alphabetical&level_of_listing=0&show_synonyms=1&show_author=1&show_english=1&show_spanish=1&show_french=1&scientific_name=&page=1&per_page=20

*18 https://publications.jrc.ec.europa.eu/repository/bitstream/JRC109354/biomass_4_energy_brief_online_1.pdf

2.3 Actions taken to promote certification amongst feedstock supplier

United Loggers OÜ promotes FSC certification for Sustainable Forest Management. We explain to our suppliers the requirements and regulations involved in the chain of custody. United Loggers has prepared a suppliers code of conduct that is signed with all suppliers. These documents promote legal and sustainable forest management and exclude timber from undefined sources and from Woodland Key Habitats (WKH).

2.4 Quantification of the Supply Base

Supply Base

- a. **Total Supply Base area (million ha):** 25,50
- b. **Tenure by type (million ha):**9.18 (Privately owned), 13.60 (Public), 2.72 (Community concession)
- c. **Forest by type (million ha):**25.50 (Temperate)
- d. **Forest by management type (million ha):**25.50 (Managed natural)
- e. **Certified forest by scheme (million ha):**10.78 (FSC), 18.17 (PEFC)

Describe the harvesting type which best describes how your material is sourced: Mix of the above
Explanation: From clearcutting coming treetops, branches and bushes From thinning treetops, branches and thinner wood material.

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

Explanation: In Poland the raw material for wood chips production comes from timber damaged by the storm, slash, brush and undergrowth material obtained from salvage logging. Up to 5% of the raw material is gained from sub-standard quality timber – material that has become unusable due to weather or market conditions.

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: regulated by law

Was the feedstock used in the biomass removed from a forest as part of a pest/disease control measure or a salvage operation? Yes - Majority

Explanation: In Germany spruce forests were hit by an extraordinarily heavy attack by the spruce bark beetle after consecutive warm and dry summers. Various estimations put the scale of damaged or dried out forests at around 100m cubic meters.

Feedstock

Reporting period from: 01 Sep 2019

Reporting period to: 31 Aug 2020

- a. **Total volume of Feedstock:** 1-200,000 tonnes
- b. **Volume of primary feedstock:** 1-200,000 tonnes
- c. **List percentage of primary feedstock, by the following categories.**
- Certified to an SBP-approved Forest Management Scheme: 80% - 100%
 - Not certified to an SBP-approved Forest Management Scheme: 1% - 19%
- d. **List of all the species in primary feedstock, including scientific name:** Picea abies (spruce); Pinus sylvestris (pine); Betula spp (birch); Populus spp (aspen, poplar); Alnus spp (alder); Juniperus communis (juniper); Fagus spp (beech); Fraxinus spp (ash); Larix spp (larch); Quercus spp (oak); Acer platanoides (maple); Salix spp (willow); Tilia cordata (lime);
- 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 (%):** 15,00
- g. **Softwood (i.e. coniferous trees): specify proportion of biomass from (%):** 85,00
- 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:** Saw logs are usually called the part of the log whose properties allow it to be used to produce lumber, plywood or timber.
- j. **Roundwood from final fellings from forests with > 40 yr rotation times - Average % volume of fellings delivered to BP (%):** 85,00
- k. **Volume of primary feedstock from primary forest:** 0 tonnes
- 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: 1% - 19%
- 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	15,00	8,00	77,00	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 United Loggers OÜ 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.

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:

Country: Estonia

Indicator with specified risk in the risk assessment used:

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.

Specific risk description:

WKHs (Woodland Key Habitat) are forest habitats with high probability of present occurrence of endangered, vulnerable and rare species. The 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 Estonian legislation WKHs protection is optional for private forest owners. They can sign a contract with the state and protect the WKH. In this case, the state pays compensation to the owner for protecting the WKH. If the 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 felling are done without felling permit (it is allowed to do small scale sanitary cutting without felling permit) the 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/PEFC certified private forest and in private forests where WKH contract has been signed, WKH are protected.

4.2 Justification

United Loggers will rely on SBP-endorsed Regional Risk Assessments for Estonia (2016) that meet the requirements of SBP Framework Standard 1 and 2. The SBP secretariat approved it for Estonia on 22.04.2016. United Loggers OÜ agrees with all the findings, conclusions and mitigation measures set out in the reports for Estonia 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 WKHs. In this case the state pays compensation to the owner for the protection of a

WKH. If the private forest owner does not want to protect a WKH, the agreement ends and they are then allowed to cut it. In state forest and in FSC/PEFC certified private forest WKHs 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 a 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 more details 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 criterion were assigned low risk. The only “specified risk” was associated with the indicator 2.1.2: “The biomass producer applies a verification system and procedures to identify risks arising from forestry on forests and other areas with a high conservation value (HCV)”. The indicator was assigned as “specified risk” due to the protection status of HCVs. Based on the findings of the SBE it can be concluded: as long as the risks associated with indicator 2.1.2 are mitigated, feedstock from Estonia is low risk and is meeting the requirements for SBP-compliant feedstock.

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/#/>, 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.

In Latvia SBP-compliant material is sourced from SBP certified supplier. For every consignment will be signed contract and will be completed proper documents.

In Poland, the supplier is a national authority managing state forests. The origin of supplies is proved by purchase agreements signed with them, invoices and accompanying documents. A separate document is issued by the authority for all transport carriers for each shipment. The goods come exclusively from FSC forests.

In Germany, goods are sourced from PEFC and FSC forests. The origin of supplies is proved by purchase agreements, accompanying documents and invoices. All individual patches of goods as well as loading areas are inspected and fixed together with the forest management authorities of the Länder, who also issue separate accompanying documentation for each shipment.

To avoid risks related to raw material and forestry activities, United Loggers inspects, together with suppliers, the origin of all primary raw material and requirements at logging.

6 Stakeholder consultation

The first stakeholder consultation round of the Estonian RRA was completed from 26.03.2015 to 26.04.2015 and the second round from 05.05.2015 to 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 of Nature (EFN), Graanul Invest AS and the Estonian Forest and Wood Industries Association (EMPL) provided their feedback.

During the first consultation period (23.03.2015-26.04.2015) 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 criterion 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:
<http://www.sustainablebiomasspartnership.org/documents/risk-assessments/regional-risk-assessments-for-the-baltic-states/estonia>

United Loggers conducted its stakeholder consultation process of the SBE from 29.09.2016-29.10.2016, 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. No comments were received from stakeholders.

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

6.1 Response to stakeholder comments

Description: State Forest Management Centre

Comment: N/A

Response: N/A

Description: Foundation Private Forest Centre

Comment: N/A

Response: N/A

Description: Estonian Private Forest Association

Comment: N/A

Response: N/A

Description: FSC Estonia

Comment: N/A

Response: N/A

Description: PEFC Estonia

Comment: N/A

Response: N/A

Description: Estonian Forest and Wood Industries Association

Comment: N/A

Response: N/A

Description: Estonian Forest Society

Comment: N/A

Response: 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.

Specific risk description: WKHs (Woodland Key Habitat) are forest habitats with high probability of present occurrence of endangered, vulnerable and rare species. The 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 Estonian legislation WKHs protection is optional for private forest owners. They can sign a contract with the state and protect the WKH. In this case, the state pays compensation to the owner for protecting the WKH. If the 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 felling are done without felling permit (it is allowed to do small scale sanitary cutting without felling permit) the 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/PEFC certified private forest and in private forests where WKH contract has been signed, WKH are protected.

Mitigation measure:

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.

Specific risk description: WKHs (Woodland Key Habitat) are forest habitats with high probability of present occurrence of endangered, vulnerable and rare species. The 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 Estonian legislation WKHs protection is optional for private forest owners. They can sign a contract with the state and protect the WKH. In this case, the state pays compensation to the owner for protecting the WKH. If the 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 felling are done without felling permit (it is allowed to do small scale sanitary cutting without felling permit) the on-site visit is only way to see if the WKH is untouched or not. Please see section 9 for a description of the detailed mitigation actions. In state forest and in FSC/PEFC certified private forest and in private forests where WKH contract has been signed, WKH are protected.

Mitigation measure:

The mitigation measures described below will only be applied for feedstock that is in the scope of the SBE. The responsible person for the implementation of the SBE is the Executive Director of United Loggers 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, United Loggers 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.

United Loggers 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 authorities) 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:

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

1.1 If yes, go to 2.

1.2 If no, the products cannot be sourced.

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

2.1 If yes, go to 3.

2.2 If no, the products cannot be sourced.

3. Is there a felling permit issued?

3.1 If yes, go to 5.

3.2 If no, go to 4.

4. Felling's from not woodlands and without felling permit (according to forest act).

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

sourced.

4.2 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?

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

5.2 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. 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.

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 or PEFC certification, 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 eco-system or natural balance in the sourcing site. United Loggers will keep register of all cases were material originating from WKH or potentially WKH areas 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 V3-0. 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. 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. United Loggers 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. The EBU expert has reviewed and approved the report in January 2017

9.2 Public or additional reviews

The SBR is publicly available at United Loggers homepage <http://www.united-loggers.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:	Raido Maisvee	district manager	17 Feb 2021
	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:	Peeter Volke	executive director	18 Feb 2021
	Name	Title	Date

Annex 1: Detailed findings for Supply Base Evaluation indicators

N/A