



Supply Base Report:

Laskana SIA LSEZ Scope Change Audit

Sustainable Biomass Program
sbp-cert.org



Completed in accordance with the Supply Base Report Template Version 2.2 and SBP Bridging Requirements for Meeting the Directive EU/2023/2413 (REDIII)

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

Document history

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1 Overview

Producer name:	Laskana SIA LSEZ
Producer address:	Brivostas str. 40, LV-3405 Liepāja, Latvia
SBP Certificate Code:	SBP-01-71
Geographic position:	56.529500, 20.999900
Primary contact:	Ojārs Zeme, +371 6342 3111, ojars.zeme@laskana.lv
Company website:	www.laskana.lv
Date report finalised:	14 Sep 2025
SBR reporting period from:	21 May 2025
SBR reporting period to:	31 Aug 2025
Name of the Certification Body:	Preferred by Nature OÜ
Certification Body Approval date:	15 Dec 2025
SBP Standard(s) used:	SBP Standard 1: Feedstock Compliance v2.0, SBP Standard 2: Feedstock Verification v2.0, SBP Standard 4: Chain of Custody v2.0, SBP Standard 5: Collection and Communication of Data v2.0, Instruction Document 5E: Collection and Communication of Energy and Carbon Data v2.0, Instruction Document EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413 v2.0
Feedstock origin (countries)	Latvia (Latvia)
Weblink to Standard(s) used:	https://sbp-cert.org/documents/standards-documents/standards

2 Description of the Biomass Producer and the Supply Base

2.1 Description of the company

The Latvia-Sweden joint venture “Laskana” was established in 1993 in the Liepaja Special Economic Zone, located in the western part of Latvia. At that time, the organisation’s main activity was timber export. Over the past 30 years, the organisation has grown significantly, investing in infrastructure development and improvement, acquiring various equipment and machinery, as well investing in personnel training and expanding its market reach and business directions.

The main lines of activity include:

- Transportation of timber
- Transportation of wood chips
- Ship agency services
- Stividor services
- Repair shop services.

LSEZ Ltd LASKANA materials are high-quality, sustainable and meet the requirements of various standards:

- Organization holds valid FSC chain of custody (SCS-COC-007770) and Controlled Wood (SCS COC-007770) certificates which covers procurement, storage and sales of fuelwood, round wood, bark, pulpwood, sawlogs and veneer wood.
- Organization also holds valid PEFC chain of custody (TT PEFC-COC161) certificate which covers procurement, storage and sales of fuelwood, round wood, bark, pulpwood, sawlogs and veneer wood.
- LSEZ Ltd LASKANA is also a wood pellet trader with EN PLUS certificate (LV 322).

Organisation is a wood chip producer and trader. The region of biomass origin is Latvia via direct purchase and supply.

The organisations primary feedstock of wood chip purchases are originating from Latvian forests.

Wood chips are also produced from different types of low quality wood and firewood delivered with FSC or PEFC claims and are verified according to the Sustainable Biomass Program (SBP).

The SBP certificate scope covers office in Liepāja harbour, wood chips production and storage facilities in the Liepaja harbour.

All feedstock is delivered to Liepaja port by trucks (Latvia), where the chips are stored and log chipping is taking place.

Export wood chips are transported with vessels from Liepāja port (FOB Liepāja). From Riga and Roja ports export is based on FOB Riga and FOB Roja Incoterms.

Products included in the scope of SBP Certification: *WB 2.1 Wood chips*

Number of employees: 81

Annual maximum production capacity (metric tonnes): 200000

Number of direct feedstock suppliers: 29

Approximate number of feedstock sub-suppliers: 20

Description of the chain-of-custody and upstream supply chain:

Most of LSEZ Ltd LASKANA's biomass suppliers have long-term cooperation experience.

Biomass is delivered and purchased from ~29 suppliers.

LSEZ Ltd LASKANA suppliers supply primary biomass and post-processing biomass.

Biomass is obtained after logging and is produced from round timber and branch, a part of which is from our own FSC certified areas (total area 7823,35 ha).

Part of the supplied biomass is secondary material, which is defined as processing residues.

The company policy is directed at cooperation with certified supplier. In year 2019 company established differentiated prices for material purchase in Liepaja terminal, price is higher for FSC certified material. Volume of round timber chipping in port of Liepaja was very small during this reporting period, because more economically efficient was woodchip purchase. LSEZ Ltd LASKANA initiates and offers better supply conditions to SBP, FSC and PEFC certified suppliers and raises interest of non-certified round timber processors, as well as motivates forest owners to obtain certification.

Organization is buying wood chips from SBP, FSC and PEFC certified or FSC Controlled wood certified suppliers.

Wood chips are also produced from different types of low quality round wood and firewood delivered as FSC or PEFC certified. All FSC and PEFC certified biomass from suppliers is verified against SBP standards and SBP-endorsed Regional Risk Assessment for Latvia. Very small amount of feedstock is verified through SBE, this system is maintained in case any significant increase of SBP compliant biomass demand.

All feedstock is delivered to Liepaja (Latvia) port by truck, where the chips are stored and log chipping is taking place.

2.2 Detailed description of the Supply Base

Guidance: Tables below have been generated automatically for each sourcing country based on the selection of 'Feedstock origin (countries)' in section 1 above.

Annex 1 is generated by the system if the SBP SBE is used without Regional Risk Assessment(s) (RRAs). In case RRA(s) is used, further details shall be given only in section 3 below.

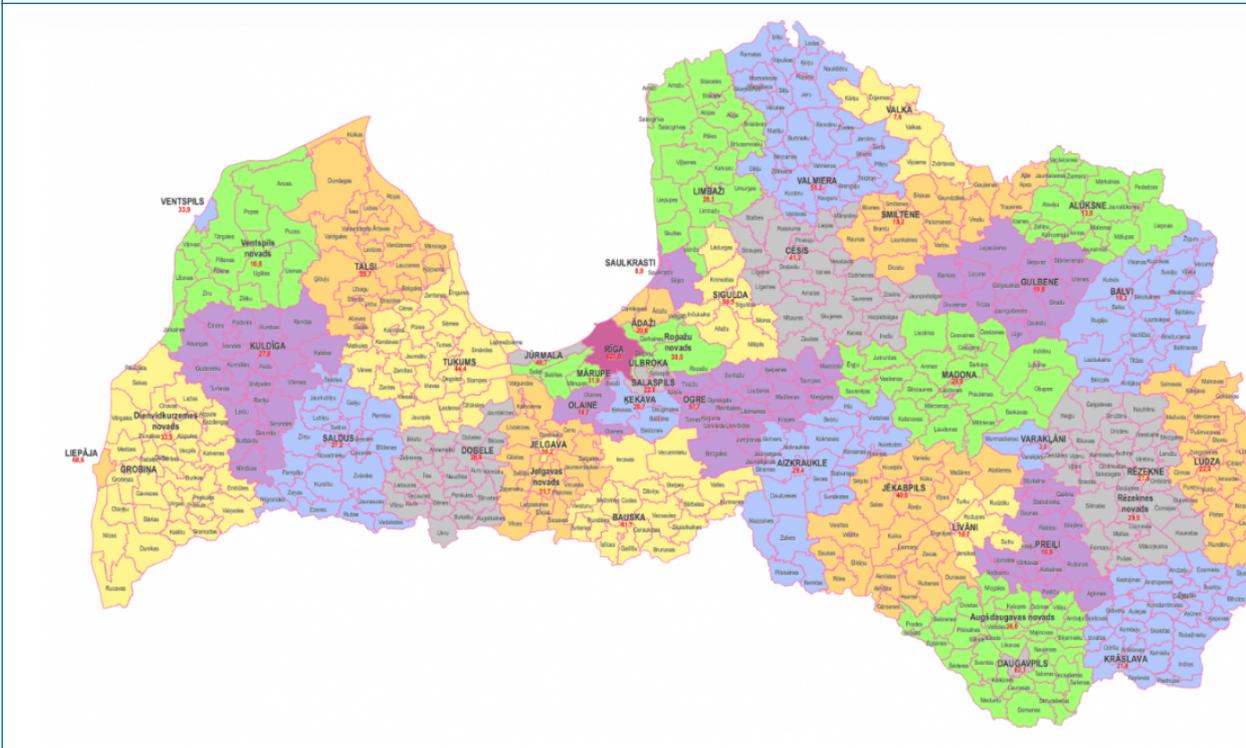
Annex 2 is generated if EU RED SBE is in the scope for each country separately.

Country	Latvia
Area/Region	Latvia
Exclusions	No
Feedstock types	Primary, Processing residues ¹
Feedstock Product Groups	Forest feedstock (1A), Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock , SBP Controlled feedstock
Is the forest managed to supply energy and non-energy markets?	Yes - Majority
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
Risk assessment(s)	Yes – Regional Risk Assessment (RRA) used, N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme
Provide a concise summary of why a SBE was determined to be required or not required here:	

Very small amount of feedstock is verified through SBE, this system is maintained in case any significant increase of SBP compliant biomass demand. Included only primary biomass material.

Feedstock types included in SBE:	Primary
Includes EU RED SBE:	Yes
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	No
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	3.4410

Map(s) of the Supply Base area:



2.3 Feedstock information

- a. **Total volume of Feedstock:** 1-200,000 m³
- b. **Volume of primary feedstock:** 1-200,000 m³
- c. **List of all the species in primary feedstock, including scientific name:**

Betula pendula	Birch
Betula pubescens	Birch
Populus tremula	Aspen
Picea abies	Spruce
Pinus sylvestris	Pine
Fraxinus excelsior	Ash
Alnus glutinosa	Black alder
Alnus incana	Grey alder
Tilia cordata	Linden
Quercus robur	Oak

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

Explanation: Biomass was obtained from forests through both pest/disease control measures and salvage operations. Every year in Latvia, sanitary felling is carried out in areas affected by diseases or pests to prevent the spread of epidemics in forest ecosystems. In 2023, over 20,000 ha of sanitary felling were carried out to mitigate the impact of diseases and pests. The main goals of these operations are to free up space for healthier, more valuable trees, promote faster and higher quality growth of stronger trees, improve the forest's resilience to pests and diseases, and support biodiversity. Additionally, trees infested with bark beetles or affected by sudden oak death are removed to prevent the further spread of these issues. Similarly, dead or dying trees, damaged by wildfires, storms, or disease outbreaks, are harvested for biomass production to prevent decay and promote the sustainable use of forest resources.

- e. **Hardwood (i.e. broadleaf trees): specify proportion of feedstock from (%):** 70.00
- f. **Softwood (i.e. coniferous trees): specify proportion of feedstock from (%):** 30.00
- g. **Proportion of feedstock composed of or derived from saw logs by weight (%):** 0.00
- h. **Indicate how you determine the proportion of saw log:** Specification issued by a body exercising functions of a public nature and issued for use by sawmills in the area in which the wood was grown.
- i. **Roundwood from fellings from forests with > 40 yr rotation times - Average % volume of fellings delivered to BP (%):** 75.00
- j. **Select forest type(s) where the primary feedstock was sourced from:** Mix of The Above
- k. **Select the main harvesting system(s) used for the sourced primary feedstock:** Mix of the above
- l. **Volume of primary feedstock from primary forest:** 0
- m. **Volume of processing residues feedstock:** 1-200,000 m³
Physical form of the feedstock: Chips
- n. **Share of SBP-recognised system claim for processing residues:**

20 % FSC

80 % PEFC

o. Volume of post-consumer feedstock: 0

Physical form of the feedstock: Chips

p. Estimated amount of EU RED-compliant sustainable feedstock that could be collected annually by the BP: 50000 m³

q. What is the estimated amount of EU RED-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated): 50000.00 m³

Explanation: All biomass Volume meets EU RED-compliant biomass requirements, EU RED-compliant biomass assessment and approval system in place for secondary and primary biomass.

3 Supply Base Risk Assessments and Risk Management Measures

Guidance: Biomass Producers shall demonstrate that any specified risks of sourcing feedstock not in compliance with SBP Standard 1 have been adequately reduced to low risk, following Standard 2 requirements. Following section applies to Biomass Producer's implementing SBP Supply Base Evaluation (SBP RRA or company own risk assessment). EU RED Supply Base Evaluation details are reported in Annex 2.

Not Applicable – Supply Base Evaluation not implemented

3.1 Summary of the Supply Base Evaluation

LSEZ Ltd LASKANA applied Sustainable Biomass Program (SBP) Revised Regional Risk Assessment for Latvia Version 2.0 Effective date: 12 July 2024.

3.2 Conflicts with applicable national and sub-national legislation

N/A

3.3 Risk Management Measures

Guidance: Please provide more details about specified risk indicators in each supply country and describe mitigation measures taken to address all specified risks associated with indicators.

Country: Latvia	
Area/sub-scope: All	
Risk Assessment used:	
	<input type="checkbox"/> SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim <input type="checkbox"/> SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim <input type="checkbox"/> SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim <input type="checkbox"/> SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed <input type="checkbox"/> SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim <input type="checkbox"/> SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed <input checked="" type="checkbox"/> SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed <input type="checkbox"/> SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed <input type="checkbox"/> SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim <input type="checkbox"/> SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim <input type="checkbox"/> SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim <input type="checkbox"/> SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim <input type="checkbox"/> SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim <input type="checkbox"/> SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim <input type="checkbox"/> Biomass Producer's own risk assessment
Indicator with specified risk:	
2.1.1 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.	
Description of the specific risk:	

This risk was classified as high in Latvia due to the lack of data on certain high-value forest areas. HCV monitoring has been conducted in Latvia, and HCV areas are displayed in the "OZOLS" data management system (a natural data management system containing data on specially protected nature areas, micro-reserves, conservation efforts for protected species and habitats, tourism infrastructure in protected areas, restrictions on economic activities in protected nature zones and micro-reserves, the State Register of cartographic data, biodiversity monitoring data, and other relevant nature protection information). However, there is a risk that these areas may not yet be legally protected, which means that cutting licenses could still be granted for logging activities. Additionally, new nests of protected bird species may be found that are not recognized or registered in the "OZOLS" database. This poses a risk that the favorable conditions for protected bird species at these sites could be disturbed or destroyed by logging activities.

LSEZ Ltd LASKANA applied Sustainable Biomass Program (SBP) Revised Regional Risk Assessment for Latvia Version 2.0 Effective date: 12 July 2024.

Mitigation measure:

LSEZ Ltd LASKANA identifies the sites and locations of HCV category 1 areas and, if necessary, conducts a compliance assessment with or without expert consultation.

LSEZ Ltd LASKANA specialist checks the database "Ozols" when receiving the load along with the Felling Permit (without the Felling Permit organisation does not accept the load), checks the feedstock origin data. To obtain accurate and reliable origin data, the organization requires the Cadastre Number information for each sourced load or logging site and verifies it. Cadastre data (cadastral number, quarter number and site number of the unit of forest land) is obtained from Felling Permits and purchase agreements. This process ensures that the feedstock origin is accurately documented and verified.

The following information sources are used: the "Ozols" database, field inspections (which include assessing the presence of large bird nests, distances, characteristics of cultural and historical objects, and trees with a diameter greater than 80 cm at breast height, with observations marked in the ozols.gov.lv database printout), monitoring records, interviews with supplier staff, stakeholders, communication with experts, species protection plans/maps, regional and publicly available data from trusted third parties, environmental NGO reports/maps, relevant websites of the State Forest Service, the Nature Conservation Agency, and EU agencies, as well as relevant Latvian national and EU legislations, laws, and regulations. All data and information are documented.

If a habitat of a rare, threatened, or endangered species is identified in the feedstock origin data, an onsite inspection must be conducted to confirm that the habitat has been preserved in accordance with legal requirements, has not been damaged by forest management activities, and that the supplier has considered the specific needs of the species' habitat and adhered to responsible logging practices. If needed, an expert opinion will be sought. Feedstock will only be accepted as SBP-compliant if the HCV 1 risks have been mitigated.

As part of its risk mitigation process (as defined in the organization's procedures in accordance with SBP standard requirements), the organization includes the signing of a supplier self-declaration and the completion of the "Data for Tree Origin, Legality, and Specimen" form. This approach ensures the timely identification and reduction of risks related to non-compliant SBP supplies and raw materials.

Trainings and seminars are provided for the company employees and biomass suppliers. The objective of the trainings is to teach involved parties to recognize the signs of potential possible biotopes, bird nesting sites, cultural and historical objects, and to fully guarantee work safety requirements at our own company and the companies of service providers.

Monitoring and outcomes:

In collaboration with stakeholders and consulting with logging and wood processing companies on risk mitigation options, a specific risk mitigation procedure was developed and incorporated into the risk assessment. This procedure defines the process for field/on-site inspections and documentation requirements.

LSEZ Ltd LASKANA do not accept biomass if the accompanying documentation contained an incorrect FSC or PEFC certification number. No biomass deliveries were rejected in the past year.

The organization included only one supplier in its SBE system, for whom risk mitigation measures were applied in accordance with the organization's SBE-developed procedure. The results confirm that these measures ensure a low level of risk.

LSEZ Ltd LASKANA has received signed supplier self-declarations and "Data for Tree Origin, Legality, and tree species" forms from all biomass suppliers. This approach ensures timely risk identification and mitigation related to non-compliant SBP supplies and raw materials.

Before accepting a load, the organization verifies the information specified in the Felling Permits within the "Ozols" database. To ensure that biomass is not sourced from potentially biologically valuable stands, species, ecosystems, or areas with significant biodiversity and high carbon stock, 12 forest management units—including forest properties and estates—were inspected during the reporting period:

- 12 forest properties were visited before or after logging;
- 2 producers supplying wood chips after processing.

Audit findings:

The audits did not identify any cases where biomass was sourced from potentially biologically valuable stands, species, ecosystems, or areas with significant biodiversity and high carbon stock. No large bird nests (over 50 cm) or trees with a diameter exceeding 80 cm at breast height were found in the inspected felling areas. No HCV presence was identified at the raw material origin locations specified in the Felling Permits.

Thus, it is concluded that the organization's suppliers understand the importance of preserving valuable habitats, species, ecosystems, and areas of high biodiversity significance. Logging companies are informed about the necessity of leaving deadwood and ecological trees and are adhering to other forest conservation requirements. The audits confirmed that logging restrictions imposed by administrative territories are followed.

Conclusion:

Audit results confirm that risk mitigation measures effectively ensure low risk.

LSEZ Ltd LASKANA has not received any complaints or objections regarding the risk verification process. This confirms that the organization's verification process is effective and appropriate. The organization's suppliers are long-term partners who are well-informed about LSEZ Ltd LASKANA's policies, operational procedures, and quality requirements.

LSEZ Ltd LASKANA one time in 12 months performs internal audits to assess risks mitigation factors to

ensure effectiveness and compliance of suppliers with risk mitigation measures. The internal audits is carried out within FSC, PEFC and SBP systems.

Country: Latvia

Area/sub-scope: All

Risk Assessment used:

- SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim
- SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim
- SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim
- SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed
- SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim
- SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed
- SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed
- SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed
- SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim
- SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim
- SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim
- SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim
- SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim
- SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim
- Biomass Producer’s own risk assessment

Indicator with specified risk:

2.1.2 Threats to and impacts on the identified key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified and evaluated.

Description of the specific risk:

This risk has been classified as high in Latvia due to insufficient data availability concerning specific High Conservation Value (HCV) forest areas. While HCV monitoring has been conducted and the identified areas are recorded in the "OZOLS" data management system—an integrated natural data management tool containing information on specially protected nature territories, micro-reserves, conservation measures for protected species and habitats, tourism infrastructure in protected areas, restrictions on economic activities, cartographic data from the State Register, biodiversity monitoring, and other relevant conservation details—significant risks persist.

One of the primary risks stems from the fact that some HCV areas may lack formal legal protection. Consequently, logging permits may still be issued, resulting in potential damage to these ecologically valuable sites. Additionally, nests of protected bird species may be discovered in locations not currently identified or registered within the "OZOLS" database. This raises the concern that these habitats could be disturbed or destroyed before appropriate conservation measures are implemented.

In conclusion, forest conservation efforts in Latvia face notable challenges, including incomplete species data, inadequate legal protections for certain HCV areas, and conflicts between biodiversity preservation goals and commercial forestry activities.

LSEZ Ltd LASKANA applied Sustainable Biomass Program (SBP) Revised Regional Risk Assessment for

Latvia Version 2.0 Effective date: 12 July 2024.

Mitigation measure:

LSEZ Ltd LASKANA identifies the sites and locations of HCV category 1 and 3 areas and, if necessary, conducts a compliance assessment with or without expert consultation.

LSEZ Ltd LASKANA specialist checks the database "Ozols" when receiving the load along with the Felling Permit (without the Felling Permit organisation does not accept the load), checks the feedstock origin data. To obtain accurate and reliable origin data, the organization requires the Cadastre Number information for each sourced load or logging site and verifies it. Cadastre data (cadastral number, quarter number and site number of the unit of forest land) is obtained from Felling Permits and purchase agreements. This process ensures that the feedstock origin is accurately documented and verified.

The following information sources are used: the "Ozols" database, field inspections (which include assessing the presence of large bird nests, distances, characteristics of cultural and historical objects, and trees with a diameter greater than 80 cm at breast height, with observations marked in the "Ozols" database printout), monitoring records, interviews with supplier staff, stakeholders, communication with experts, species protection plans/maps, regional and publicly available data from trusted third parties, environmental NGO reports/maps, relevant websites of the State Forest Service, the Nature Conservation Agency, and EU agencies, as well as relevant Latvian national and EU legislations, laws, and regulations. All data and information are documented.

If a habitat of a rare, threatened, or endangered species is identified in the feedstock origin data, an onsite inspection must be conducted to confirm that the habitat has been preserved in accordance with legal requirements, has not been damaged by forest management activities, and that the supplier has considered the specific needs of the species' habitat and adhered to responsible logging practices. If needed, an expert opinion will be sought. Feedstock will only be accepted as SBP-compliant if the HCV 1 and HCV 3 risks have been mitigated.

As part of its risk mitigation process (as defined in the organization's procedures in accordance with SBP standard requirements), the organization includes the signing of a supplier self-declaration and the completion of the "Data for Tree Origin, Legality, and Specimen" form. This approach ensures the timely identification and reduction of risks related to non-compliant SBP supplies and raw materials.

Trainings and seminars are provided for the company employees and biomass suppliers. The objective of the trainings is to teach involved parties to recognize the signs of potential possible biotopes, bird nesting sites, cultural and historical objects, and to fully guarantee work safety requirements at our own company and the companies of service providers.

Monitoring and outcomes:

In collaboration with stakeholders and consulting with logging and wood processing companies on risk mitigation options, a specific risk mitigation procedure was developed and incorporated into the risk assessment. This procedure defines the process for field/on-site inspections and documentation requirements.

LSEZ Ltd LASKANA do not accept biomass if the accompanying documentation contained an incorrect FSC or PEFC certification number. No biomass deliveries were rejected in the past year.

The organization included only one supplier in its SBE system, for whom risk mitigation measures were applied in accordance with the organization's SBE-developed procedure. The results confirm that these measures ensure a low level of risk.

LSEZ Ltd LASKANA has received signed supplier self-declarations and "Data for Tree Origin, Legality, and tree species" forms from all biomass suppliers. This approach ensures timely risk identification and mitigation related to non-compliant SBP supplies and raw materials.

Before accepting a load, the organization verifies the information specified in the Felling Permits within the "Ozols" database. To ensure that biomass is not sourced from potentially biologically valuable stands, species, ecosystems, or areas with significant biodiversity and high carbon stock, 12 forest management units—including forest properties and estates—were inspected during the reporting period:

- 12 forest properties were visited before or after logging;
- 2 producers supplying wood chips after processing.

Audit findings:

The audits did not identify any cases where biomass was sourced from potentially biologically valuable stands, species, ecosystems, or areas with significant biodiversity and high carbon stock. No large bird nests (over 50 cm) or trees with a diameter exceeding 80 cm at breast height were found in the inspected felling areas. No HCV presence was identified at the raw material origin locations specified in the Felling Permits.

Thus, it is concluded that the organization's suppliers understand the importance of preserving valuable habitats, species, ecosystems, and areas of high biodiversity significance. Logging companies are informed about the necessity of leaving deadwood and ecological trees and are adhering to other forest conservation requirements. The audits confirmed that logging restrictions imposed by administrative territories are followed.

Conclusion:

Audit results confirm that risk mitigation measures effectively ensure low risk.

LSEZ Ltd LASKANA has not received any complaints or objections regarding the risk verification process. This confirms that the organization's verification process is effective and appropriate. The organization's suppliers are long-term partners who are well-informed about LSEZ Ltd LASKANA's policies, operational procedures, and quality requirements.

Over the past year, we have not rejected any biomass deliveries due to the presence of HCVs at the raw material origin locations specified in the felling permits. The organization's suppliers are long-standing partners who are well-informed about LSEZ Ltd LASKANA's policies, work procedures, and quality requirements.

LSEZ Ltd LASKANA one time in 12 months performs internal audits to assess risks mitigation factors to ensure effectiveness and compliance of suppliers with risk mitigation measures. The internal audits is carried out within FSC, PEFC and SBP systems.

Country: Latvia

Area/sub-scope: All

Risk Assessment used:	
	<input type="checkbox"/> SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim <input type="checkbox"/> SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim <input type="checkbox"/> SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim <input type="checkbox"/> SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed <input type="checkbox"/> SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim <input type="checkbox"/> SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed <input checked="" type="checkbox"/> SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed <input type="checkbox"/> SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed <input type="checkbox"/> SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim <input type="checkbox"/> SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim <input type="checkbox"/> SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim <input type="checkbox"/> SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim <input type="checkbox"/> SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim <input type="checkbox"/> SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim <input type="checkbox"/> Biomass Producer's own risk assessment
Indicator with specified risk:	
2.1.3 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.	
Description of the specific risk:	
<p>This risk has been classified as high in Latvia due to insufficient data availability concerning specific High Conservation Value (HCV) forest areas. While HCV monitoring has been conducted, and the identified areas are recorded in the "OZOLS" data management system—an integrated natural data management tool containing information on specially protected nature territories, micro-reserves, conservation measures for protected species and habitats, tourism infrastructure in protected areas, restrictions on economic activities, cartographic data from the State Register, biodiversity monitoring, and other relevant conservation details—significant risks persist.</p> <p>One of the primary risks stems from the fact that some HCV areas may lack formal legal protection. Consequently, logging permits may still be issued, resulting in potential damage to these ecologically valuable sites. Additionally, nests of protected bird species may be discovered in locations not currently identified or registered within the "OZOLS" database. This raises the concern that these habitats could be disturbed or destroyed before appropriate conservation measures are implemented.</p> <p>In conclusion, forest conservation efforts in Latvia face notable challenges, including incomplete species data, inadequate legal protections for certain HCV areas, and conflicts between biodiversity preservation goals and commercial forestry activities.</p> <p>LSEZ Ltd LASKANA applied Sustainable Biomass Program (SBP) Revised Regional Risk Assessment for Latvia Version 2.0 Effective date: 12 July 2024.</p>	
Mitigation measure:	
<p>LSEZ Ltd LASKANA identifies the sites and locations of HCV category 1 and 3 areas and, if necessary, conducts a compliance assessment with or without expert consultation.</p> <p>LSEZ Ltd LASKANA specialist checks the database "Ozols" when receiving the load along with the Felling Permit (without the Felling Permit organisation does not accept the load), checks</p>	

the feedstock origin data. To obtain accurate and reliable origin data, the organization requires the Cadastre Number information for each sourced load or logging site and verifies it. Cadastre data (cadastral number, quarter number and site number of the unit of forest land) is obtained from Felling Permits and purchase agreements. This process ensures that the feedstock origin is accurately documented and verified.

The following information sources are used: the "Ozols" database, field inspections (which include assessing the presence of large bird nests, distances, characteristics of cultural and historical objects, and trees with a diameter greater than 80 cm at breast height, with observations marked in the "Ozols" database printout), monitoring records, interviews with supplier staff, stakeholders, communication with experts, species protection plans/maps, regional and publicly available data from trusted third parties, environmental NGO reports/maps, relevant websites of the State Forest Service, the Nature Conservation Agency, and EU agencies, as well as relevant Latvian national and EU legislations, laws, and regulations. All data and information are documented.

If a habitat of a rare, threatened, or endangered species is identified in the feedstock origin data, an onsite inspection must be conducted to confirm that the habitat has been preserved in accordance with legal requirements, has not been damaged by forest management activities, and that the supplier has considered the specific needs of the species' habitat and adhered to responsible logging practices. If needed, an expert opinion will be sought. Feedstock will only be accepted as SBP-compliant if the HCV 1 and HCV 3 risks have been mitigated.

As part of its risk mitigation process (as defined in the organization's procedures in accordance with SBP standard requirements), the organization includes the signing of a supplier self-declaration and the completion of the "Data for Tree Origin, Legality, and Specimen" form. This approach ensures the timely identification and reduction of risks related to non-compliant SBP supplies and raw materials.

Trainings and seminars are provided for the company employees and biomass suppliers. The objective of the trainings is to teach involved parties to recognize the signs of potential possible biotopes, bird nesting sites, cultural and historical objects, and to fully guarantee work safety requirements at our own company and the companies of service providers.

Monitoring and outcomes:

In collaboration with stakeholders and consulting with logging and wood processing companies on risk mitigation options, a specific risk mitigation procedure was developed and incorporated into the risk assessment. This procedure defines the process for field/on-site inspections and documentation requirements.

LSEZ Ltd LASKANA do not accept biomass if the accompanying documentation contained an incorrect FSC or PEFC certification number. No biomass deliveries were rejected in the past year.

The organization included only one supplier in its SBE system, for whom risk mitigation measures were applied in accordance with the organization's SBE-developed procedure. The results confirm that these measures ensure a low level of risk.

LSEZ Ltd LASKANA has received signed supplier self-declarations and "Data for Tree Origin, Legality, and tree species" forms from all biomass suppliers. This approach ensures timely risk identification and mitigation related to non-compliant SBP supplies and raw materials.

Before accepting a load, the organization verifies the information specified in the Felling Permits within the

"Ozols" database. To ensure that biomass is not sourced from potentially biologically valuable stands, species, ecosystems, or areas with significant biodiversity and high carbon stock, 12 forest management units—including forest properties and estates—were inspected during the reporting period:

- 12 forest properties were visited before or after logging;
- 2 producers supplying wood chips after processing.

Audit findings:

The audits did not identify any cases where biomass was sourced from potentially biologically valuable stands, species, ecosystems, or areas with significant biodiversity and high carbon stock. No large bird nests (over 50 cm) or trees with a diameter exceeding 80 cm at breast height were found in the inspected felling areas. No HCV presence was identified at the raw material origin locations specified in the Felling Permits.

Thus, it is concluded that the organization's suppliers understand the importance of preserving valuable habitats, species, ecosystems, and areas of high biodiversity significance. Logging companies are informed about the necessity of leaving deadwood and ecological trees and are adhering to other forest conservation requirements. The audits confirmed that logging restrictions imposed by administrative territories are followed.

Conclusion:

Audit results confirm that risk mitigation measures effectively ensure low risk.

LSEZ Ltd LASKANA has not received any complaints or objections regarding the risk verification process.

This confirms that the organization's verification process is effective and appropriate. The organization's suppliers are long-term partners who are well-informed about LSEZ Ltd LASKANA's policies, operational procedures, and quality requirements.

LSEZ Ltd LASKANA one time in 12 months performs internal audits to assess risks mitigation factors to ensure effectiveness and compliance of suppliers with risk mitigation measures. The internal audits is carried out within FSC, PEFC and SBP systems.

Country: Latvia

Area/sub-scope: All

Risk Assessment used:

- SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim
- SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim
- SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim
- SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed
- SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim
- SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed
- SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed
- SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed
- SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim
- SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim
- SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim

- SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim
- SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim
- SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim
- Biomass Producer's own risk assessment

Indicator with specified risk:

3.2.3 feedstock shall not be sourced from forest areas in the Supply Base which, according to local definitions or norms, are classified as having combined attributes of high carbon stocks and high conservation value (HCV).

Description of the specific risk:

The risk has been classified as high in Latvia due to insufficient data availability concerning specific High Conservation Value (HCV) forest areas. The possibility that these areas overlap with areas with high carbon stocks such as mature secondary forests, cannot be ruled out.

Primary feedstock shall not be sourced from forest areas within the Supply Base that are identified, based on local definitions or norms, as having both high carbon stock and high conservation value (HCV) characteristics.

While HCV monitoring has been conducted and the identified areas are recorded in the "OZOLS" data management system—an integrated natural data management tool containing information on specially protected nature territories, micro-reserves, conservation measures for protected species and habitats, tourism infrastructure in protected areas, restrictions on economic activities, cartographic data from the State Register, biodiversity monitoring, and other relevant conservation details—significant risks persist.

One of the primary risks stems from the fact that some HCV areas may lack formal legal protection.

Consequently, logging permits may still be issued, resulting in potential damage to these ecologically valuable sites. Additionally, nests of protected bird species may be discovered in locations not currently identified or registered within the "OZOLS" database. This raises the concern that these habitats could be disturbed or destroyed before appropriate conservation measures are implemented.

In conclusion, forest conservation efforts in Latvia face notable challenges, including incomplete species data, inadequate legal protections for certain HCV areas, and conflicts between biodiversity preservation goals and commercial forestry activities.

LSEZ Ltd LASKANA applied Sustainable Biomass Program (SBP) Revised Regional Risk Assessment for Latvia Version 2.0 Effective date: 12 July 2024.

Mitigation measure:

Scope of the Assessment

The assessment covers the identification of species, habitats, ecosystems, and High Conservation Value (HCV) areas that are related to biodiversity and possess high carbon stock characteristics.

High carbon stock areas are identified according to the high carbon stock definition outlined in the national legislation of Latvia - the Cabinet of Ministers Regulation No. 686 "Noteikumi par ilgtspējas un siltumnīcefekta gāzu emisiju ietaupījuma kritērijiem, no biomasas kurināmā ražotās elektroenerģijas kritērijiem un kārtību, kādā pamatojama, apliecināma un uzraugāma atbilstība minētajiem kritērijiem" (02.11.2022). The organization considers areas that meet this definition as "high carbon stock" areas.

Definition of High Carbon Stock Areas

According to Cabinet of Ministers Regulation No. 686, high carbon stock areas are locations with significant carbon stocks, including:

- Forests with high carbon content (old and mature forests where carbon is stored both in the trees and in the soil);
- Wetlands and peat bogs (areas where carbon stock accumulation occurs very slowly, and their preservation is crucial to prevent the release of carbon into the atmosphere).

In these areas, any economic activity is adapted to nature conservation objectives, and the extraction of raw materials is strictly evaluated.

The organization will not purchase biomass if it is sourced as a result of deforestation or drained wetlands.

LSEZ Ltd LASKANA Approach

- LSEZ Ltd LASKANA conducts internal documentary audits regarding the presence of HCV and high carbon stock areas – the verification process of the origin of the supplied biomass in the Ozols nature data system.
- The organization may conduct on-site audits of suppliers/forest managers, if necessary, to assess threats to HCV and HCS areas. The organization includes the following in the verification process:
- As a risk mitigation measure, the organization may use Geographic Information Systems (GIS) and analyze historical spatial data.
- LSEZ Ltd LASKANA uses forest inventory databases to gather information about forest resources, structure, species composition, carbon stocks, and other forest ecosystem parameters;
- If necessary, the organization consults with local scientific and environmental organizations to ensure compliance with national and regional guidelines and to obtain the necessary information about the value of the areas;
- As part of the risk mitigation process (according to the organization's procedures that comply with SBP standard requirements), the organization includes the signing of a supplier self-declaration and completion of the "Data for Tree Origin, Legality, and tree species " form. This approach ensures the timely identification and reduction of risks associated with non-compliant SBP supplies and raw materials;
- The organization provides training and seminars for the company's employees and biomass suppliers. The purpose of the training is to educate the relevant parties on recognizing key species, habitats, ecosystems, and areas with High Conservation Value (HCV) related to biodiversity in the supply base, while also ensuring full compliance with occupational safety requirements both within the organization and its service providers.

LSEZ Ltd LASKANA regularly reviews procedures and risk management measures based on the latest guidelines and local changes as outlined in the risk assessment requirements.

Monitoring and outcomes:

In collaboration with stakeholders and consulting with logging and wood processing companies on risk mitigation options, a specific risk mitigation procedure was developed and incorporated into the risk assessment. This procedure defines the process for field/on-site inspections and documentation requirements.

LSEZ Ltd LASKANA do not accept biomass if the accompanying documentation contained an incorrect FSC or PEFC certification number. No biomass deliveries were rejected in the past year.

The organization included only one supplier in its SBE system, for whom risk mitigation measures were applied in accordance with the organization's SBE-developed procedure. The results confirm that these measures ensure a low level of risk.

LSEZ Ltd LASKANA has received signed supplier self-declarations and "Data for Tree Origin, Legality, and tree species" forms from all biomass suppliers. This approach ensures timely risk identification and mitigation related to non-compliant SBP supplies and raw materials.

Before accepting a load, the organization verifies the information specified in the Felling Permits within the "Ozols" database. To ensure that biomass is not sourced from potentially biologically valuable stands, species, ecosystems, or areas with significant biodiversity and high carbon stock, 12 forest management units—including forest properties and estates—were inspected during the reporting period:

- 12 forest properties were visited before or after logging;
- 2 producers supplying wood chips after processing.

Audit findings:

The audits did not identify any cases where biomass was sourced from potentially biologically valuable stands, species, ecosystems, or areas with significant biodiversity and high carbon stock. No large bird nests (over 50 cm) or trees with a diameter exceeding 80 cm at breast height were found in the inspected felling areas. No HCV presence was identified at the raw material origin locations specified in the Felling Permits.

Thus, it is concluded that the organization's suppliers understand the importance of preserving valuable habitats, species, ecosystems, and areas of high biodiversity significance. Logging companies are informed about the necessity of leaving deadwood and ecological trees and are adhering to other forest conservation requirements.

The organization has not made purchases from:

- Forests with high carbon content (old and mature forests where carbon is accumulated both in trees and soil);
- Wetlands and peatlands (areas where carbon stock accumulation occurs very slowly, and their preservation is essential to prevent carbon release into the atmosphere).

The audits confirmed that logging restrictions imposed by administrative territories are followed.

Conclusion:

Audit results confirm that risk mitigation measures effectively ensure low risk.

LSEZ Ltd LASKANA has not received any complaints or objections regarding the risk verification process. This confirms that the organization's verification process is effective and appropriate. The organization's suppliers are long-term partners who are well-informed about LSEZ Ltd LASKANA's policies, operational procedures, and quality requirements.

LSEZ Ltd LASKANA one time in 12 months performs internal audits to assess risks mitigation factors to ensure effectiveness and compliance of suppliers with risk mitigation measures. The internal audits is carried out within FSC, PEFC and SBP systems.

4 Stakeholder engagement

4.1 General description

Biomass Producer's stakeholder engagement start date: 12 Sep 2025

Biomass Producer's stakeholder engagement end date: 12 Oct 2025

Total number of stakeholders contacted: 73

Give a general description of the process of Stakeholders Engagement, including stakeholders contacted, method of communication and a summary of the comments received:

The organisation has published the SBP Supply Base Report, which is available on the organisation's website: <https://laskana.lv/iepirkumi/iepirkumi-ostas/>

The prepared SBP Supply Base Report has been developed in accordance with the SBP Standard and the EU RED guidance document. In line with the established procedure, an electronic informative letter was sent to the interested parties.

The list of interested parties was created to ensure comprehensive representation, including institutions and organisations representing the economic, social, and environmental interests of society, as well as local municipalities. The total number of recipients of the letter is 73.

All stakeholder comments were reviewed and systematically taken into account in the SBE process. The feedback helped update internal procedures, ensuring that forest biomass sourcing and use comply with RED III sustainability criteria and that monitoring, enforcement, and documentation processes are robust, transparent, and in accordance with the requirements.

4.2 Response to stakeholder comments

Stakeholder description: Vita Rudzīte Certification Systems Manager at PATA Group SIA PATA is the biomass supplier for LSEZ SIA LASKANA

Stakeholder comment: LSEZ SIA Laskana has developed a comprehensive and robust risk mitigation program to ensure that energy biomass complies with RED III sustainability requirements. The measures include the use of the OZOLS database, on-site inspections, involvement of industry experts, as well as informing suppliers and stakeholders. LSEZ SIA Laskana has implemented a full set of measures to guarantee that the produced energy biomass fully complies with the requirements of the RED III Directive.

Response to the stakeholder: Thank you for your message. LSEZ SIA Laskana has developed a comprehensive and robust risk mitigation program to ensure that energy biomass supplied and produced by our company fully complies with the sustainability requirements of the EU RED Directive.

Stakeholder description: Ieva Medne Latvian Biomass Association LATbio

Stakeholder comment: Currently, RED has not been fully transposed into Latvian legislation. It is divided into three parts. Amendments to the Cabinet of Ministers Regulation No. 686 of 2 November 2022 "Regulations on sustainability and greenhouse gas emission savings criteria, criteria for electricity produced from biomass fuel, and the procedure for substantiating, certifying, and monitoring compliance with the mentioned criteria." These amendments are currently published in the TAP portal but have not yet entered into force. The Energy Law – has entered into force. The Transport Energy Law – currently in the 3rd reading in the Saeima, amendments have not yet entered into force. For RED III to be fully transposed, both the law and the Cabinet regulations must enter into force. When this will happen is not known, but the alignment process is not being intentionally delayed. They are proceeding legally until full alignment is achieved. For precise actions on risk level mitigation, you may request comments from the Ministry of Agriculture and the Ministry of Climate and Energy, as both are responsible for the transposition of RED III into Latvian legislation. Additionally, I can

inform you that the Ministry of Agriculture has published Latvia's risk analysis (as required by RED III). Link here: [download](#). I would also recommend addressing this question to the aforementioned ministries. I cannot comment on the tools you have developed for risk mitigation within your company, as you are certified under SBP. I am not familiar with their standards. The Latvian Biomass Association is the national license holder for the SURE system.

Response to the stakeholder: Thank you for the information provided regarding the status of the transposition of the RED III Directive into Latvian legislation. We appreciate the clarification that RED III has not yet been fully implemented and is divided into several parts – with amendments to Cabinet Regulation No. 686, the Energy Law, and the Transport Energy Law, which is still under consideration in the Saeima at the third reading stage. It is useful to know that the transposition process is proceeding in its legal course and is not being deliberately delayed. Thank you also for the reference to the Latvian risk analysis published by the Ministry of Agriculture. We will certainly review this material and, if necessary, turn to the responsible authorities – the Ministry of Agriculture and the Ministry of Climate and Energy – to obtain more detailed clarifications regarding risk mitigation measures. We also appreciate your clarification on certification systems and the role of the Latvian Biomass Association as the national license holder of the SURE system.

Stakeholder description: Diāna Rupeika Ministry of Agriculture Forest Department Senior Expert of the Forest Resources and Hunting Division

Stakeholder comment: Thank you for your question. The Ministry of Agriculture has prepared an indicative assessment to provide clarity for businesses and the public on whether Latvian legislation and monitoring and enforcement systems are capable of ensuring that forest biomass complies with the revised sustainability criteria of Directive (EU) 2018/2001 (RED III), considering that work is still ongoing on amendments to Cabinet Regulation No. 686 of 2 November 2022, “Regulations on Sustainability and Greenhouse Gas Emission Savings Criteria, Criteria for Electricity Produced from Biomass Fuels, and the Procedure for Justifying, Certifying, and Monitoring Compliance with These Criteria,” which transpose the RED III sustainability requirements, and that the national regulations have not yet entered into force by the RED III deadline of 21 May 2025. According to the current assessment by the Ministry of Agriculture, existing Latvian legislation and monitoring and enforcement systems already ensure compliance with the essential RED III sustainability criteria and correspond to a low-risk level. The assessment can be accessed on the Ministry's website in the “Forestry Sector” section: <https://www.zm.gov.lv/lv/izvertejums-par-meza-biomasas-atbilstibu-ilgtspejas-kriterijem> .

Response to the stakeholder: Thank you for your information and indicative assessment regarding the transposition of the RED III Directive into Latvian legislation. We appreciate your clarification that the current Latvian legislation and supervisory systems already ensure compliance with the key RED III sustainability criteria and correspond to a low-risk level, as well as the information that the national regulations have not yet entered into force by the RED III deadline of 21 May 2025. This information will help our organization to further refine our risk mitigation measures and ensure that our suppliers and biomass comply with the relevant sustainability standards. We will also review the published Latvian risk assessment and, if necessary, contact the responsible ministries to obtain additional clarifications regarding risk reduction measures.

Stakeholder description: Kristaps Klauss Vice President at Latvian Forest Industry Federation Latvia

Stakeholder comment: After the distribution of stakeholder letters, a phone call was conducted. On the same day, a discussion took place regarding current issues and risk mitigation opportunities in the context of RED III. Information received: Amendments to Cabinet Regulation No. 686 of 2 November 2022 “Regulations on Sustainability and Greenhouse Gas Emission Savings Criteria, Criteria for Electricity Produced from Biomass, and the Procedure for Demonstrating, Certifying, and Monitoring Compliance with These Criteria,” including: Point 9.2 – Forests with high biodiversity and other tree-covered areas that are species-rich, not degraded, or recognized as lands of high biodiversity are considered sustainable, provided there is no evidence that the production of raw materials contradicts the nature protection objectives and land use rules established for these areas. Point 15.4.4 – Forestry operations must follow practices that minimize permanent adverse impacts on soil quality, soil compaction, and ensure that there is no significant adverse effect on biodiversity elements and habitats. It was noted that possible changes to the definition of old-growth forests are being considered. The provisional date for the amendments to enter into force could be 19 September 2025. Discussions will continue regarding recommendations in the context of the EUDR (EU Deforestation Regulation).

Response to the stakeholder: Conclusion: Following this discussion, the information and recommendations received were taken into account, internal procedures at LSEZ SIA LASKANA were updated, and recommendations for risk

mitigation measures in the SBP EU RED context were considered. This ensures that the company's forest biomass sourcing and utilization processes comply with RED III sustainability requirements and are integrated into transparent and effective control mechanisms.

5 Report updates and approval

This document is: Updated SBR (surveillance audits/scope-change audits)

SBP Instruction Document EU RED: Bridging Requirements for Meeting the Renewable Energy Directive (EU/2023/2413) added to the scope of the SBP certificate

Name	Krišjānis Vēsmiņš
Title	Management representative
Date of report approval	14 Sep 2025

Name	Ojārs Zeme
Title	Report author
Date of report approval	14 Sep 2025

Annex 1: Detailed findings for Supply Base Evaluation indicators

Annex 2: EU RED Supply Base Evaluation

Countries where EU RED Supply Base Evaluation is used	
Country	Latvia
Area	Latvia
Sustainable harvesting criteria 29(6)	
(i) The legality of harvesting operations	
Type of Risk Assessment used	<input checked="" type="checkbox"/> Level A – proof at national or sub-national level <input type="checkbox"/> Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-EU-LV-FOR_v1.0 REDIII Level A for Latvia FOR
Level B management system at the level of the forest sourcing area	N/A
(ii) Forest regeneration of harvested areas	
Type of Risk Assessment used	<input checked="" type="checkbox"/> Level A – proof at national or sub-national level <input type="checkbox"/> Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-EU-LV-FOR_v1.0 REDIII Level A for Latvia FOR
Level B management system at the level of the forest sourcing area	N/A
(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grasslands, heathland and peatlands, are protected with the aim of preserving biodiversity and preventing habitat destruction, unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes	
Type of Risk Assessment used	<input type="checkbox"/> Level A – proof at national or sub-national level <input checked="" type="checkbox"/> Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	<p>The indicative assessment prepared by the Ministry of Agriculture indicates that Latvian legislation and supervisory systems ensure compliance with the key RED III sustainability criteria and correspond to a low-risk level. This assessment serves as a basis for the organization's risk mitigation process. More information is available on the Ministry of Agriculture's website in the "Forestry Sector" section: Assessment of Forest Biomass Compliance with Sustainability Criteria. (https://www.zm.gov.lv/lv/media/17672/download?attachment)</p> <p>The risk mitigation process applicable to the requirements set out in point 29.6(iii) of the RED II Directive is based on Level A – low risk. The requirements set out in point 29.6(iii) of the RED III Directive are based</p>

	<p>on Level B – specified risk.</p> <p>Supplier Selection and Control Primary suppliers are FSC FM or FSC CoC (100%) certified. Suppliers provide a written declaration and a signed questionnaire – “Data on Wood Origin, Legality, and Species” – confirming the origin of the biomass, compliance with SBP EU RED criteria, and legality. The organization maintains supplier self-declarations, which allow audits to be conducted if necessary.</p> <p>Internal Monitoring and Verification Responsible personnel conduct an annual internal audit to ensure that biomass is not sourced from restricted (“no-go”) areas. Verification is carried out on a random basis using the Ozols nature data management system. If necessary, on-site audits of the supplier or forest manager are conducted, along with consultations with nature experts.</p> <p>Risk Mitigation for FSC CW and Controlled Wood LSEZ SIA LASKANA implements an EU RED-compliant Level B risk mitigation system at the forest sourcing area level, using the “Forest Stand and Potential Risk Assessment Questionnaire,” based on the RED III Level A Risk Assessment for Latvia Forest (SBP-RED-EU-LV-FOR v1.0 Draft) guidelines. The questionnaire ensures systematic identification and assessment of forest management risks, ensuring compliance with SBP EU RED standards and national regulatory requirements.</p> <p>Supplier Exclusion If non-compliance with a specific criterion is identified, the supplier is excluded from the supply chain.</p>
<p>(iv) that harvesting is carried out considering the maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth forests as defined in the country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located, and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with requirements to use logging systems that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and habitats</p>	
<p>Type of Risk Assessment used</p>	<p><input type="checkbox"/> Level A – proof at national or sub-national level <input checked="" type="checkbox"/> Level B – management system at forest sourcing area level</p>
<p>Level A risk assessment description</p>	<p>N/A</p>
<p>Level B management system at the level of the forest sourcing area</p>	<p>Level A for maximum thresholds for large clear-cuts. The indicative assessment prepared by the Ministry of Agriculture indicates that Latvian legislation and supervisory systems ensure compliance with the key RED III sustainability criteria and correspond to a low-risk level. This assessment serves as a basis for the organization’s risk mitigation process. More information is available on the Ministry of Agriculture’s website in the “Forestry Sector” section: Assessment of Forest Biomass Compliance with Sustainability Criteria. (https://www.zm.gov.lv/lv/media/17672/download?attachment)</p> <p>Supplier Selection and Control</p>

- Primary suppliers are selected from companies holding FSC FM or FSC CoC (100%) certification.
- FSC Principles and Criteria establish requirements for maintaining soil quality, protecting biodiversity, and safeguarding particularly sensitive areas.
- FSC CoC ensures supply chain traceability, enabling verification of material compliance with these requirements.
- Suppliers provide a written declaration and a signed questionnaire – “Data on Wood Origin, Legality, and Species” – confirming the type of material, its origin, compliance with EU RED directive requirements, legality, and species conformity.

Internal Monitoring and Verification - FSC FM and FSC CoC (100%)

- Annual internal audits are conducted for FSC FM and FSC CoC (100%) suppliers.
- Verification is performed on a random basis using the Ozols data system and other available environmental data sources.
- On-site audits of suppliers or forest managers are conducted if necessary.
- The organization collaborates with local scientific and environmental organizations.

Risk Mitigation for FSC CW and Controlled Wood

- LSEZ SIA LASKANA implements an SBP EU RED-compliant **Level B risk mitigation system at the forest sourcing area level**, using the “Forest Stand and Potential Risk Assessment Questionnaire.”
- The questionnaire is based on the RED III Level A Risk Assessment for Latvia Forest (SBP-RED-EU-LV-FOR v1.0 Draft) guidelines.
- It ensures systematic identification and assessment of forest management risks, guaranteeing compliance with the SBP EU RED Directive requirements.

Supplier Exclusion

- Suppliers are excluded from cooperation if it is identified that:
 - logging has occurred on sensitive soils,
 - primary or old-growth forests have been degraded,
 - deadwood removal thresholds are not met,
 - biomass does not comply with RED 29.6 (iv) requirements.

(v) That harvesting maintains or improves the long-term production capacity of the forest.

Type of Risk Assessment used	<input checked="" type="checkbox"/> Level A – proof at national or sub-national level <input type="checkbox"/> Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-EU-LV-FOR_v1.0 REDIII Level A for Latvia FOR
Level B management system at the level of the forest sourcing area	N/A
<p>(vi)¹ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.</p> <p><i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i></p> <p><i>(a) primary forest and other wooded land and old growth forest, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located. If there is no definition of old growth forest at the national level, then the following definition shall apply: A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.</i></p>	
Type of Risk Assessment used	<input type="checkbox"/> Level A – proof at national or sub-national level <input checked="" type="checkbox"/> Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	<p>The indicative assessment prepared by the Ministry of Agriculture indicates that Latvian legislation and supervisory systems ensure compliance with the key RED III sustainability criteria and correspond to a low-risk level. This assessment serves as a basis for the organization's risk mitigation process. More information is available on the Ministry of Agriculture's website in the "Forestry Sector" section: Assessment of Forest Biomass Compliance with Sustainability Criteria. (**https://www.zm.gov.lv/lv/media/17672/download?attachment)Supplier Selection and Control - Suppliers are selected from companies holding FSC FM or FSC CoC (100%) certification. - FSC Principles and Criteria ensure requirements for the conservation of valuable ecosystems, nature protection, and protection of particularly sensitive areas. - Suppliers submit a signed questionnaire "Data on Wood Origin, Legality, and Species", confirming the origin, legality, and compliance of the material with EU RED requirements.</p> <p>Organizational Verification Process - Annual internal audits are conducted to verify biomass origin and compliance with RED 29.6 (vi^{1,2,3,4,6}) criteria. - Verification is performed using: - Ozols data system, - Environmental Protection Authority databases, - Other available environmental data sources. - On-site audits at suppliers or forest management units are conducted if necessary. - The organization collaborates with local scientific and environmental institutions for expertise.</p>

	<p>**Risk Mitigation for FSC CW and Self-Controlled Wood** - **LSEZ SIA LASKANA** implements a SBP EU RED** compliant risk mitigation process (Level B at the forest sourcing area)** using the questionnaire ***Forest Stand and Potential Risk Assessment***. - The questionnaire is based on **RED III Level A Risk Assessment for Latvia Forest (SBP-RED-EU-LV-FOR v1.0 Draft)** guidelines. - Ensures systematic identification and assessment of forest management risks, guaranteeing compliance with **SBP EU RED standards** and applicable legal requirements.</p> <p>**Exclusion Criteria** Suppliers are excluded if it is found that: - Biomass is sourced from primary or old-growth forests (Stands that correspond to old-growth forest age classes. Classification is accordingly divided into age classes, taking into account the age of the dominant tree species); - Biomass is sourced from **high biodiversity forests**, violating nature protection requirements; - Biomass is sourced from **natural or non-natural grasslands** without promoting their conservation; - Biomass is sourced from **heathlands**; - Biomass is sourced from **peatlands**, causing drainage or degradation; - Biomass **does not comply with RED 29.6 (vi^1,2,3,4,6^)** requirements.</p>
<p>(vi)² That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.</p> <p><i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i></p> <p><i>(b) highly biodiverse forest and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.</i></p>	
<p>Type of Risk Assessment used</p>	<p><input type="checkbox"/> Level A – proof at national or sub-national level <input checked="" type="checkbox"/> Level B – management system at forest sourcing area level</p>
<p>Level A risk assessment description</p>	<p>N/A</p>
<p>Level B management system at the level of the forest sourcing area</p>	<p>The indicative assessment prepared by the Ministry of Agriculture indicates that Latvian legislation and supervisory systems ensure compliance with the key RED III sustainability criteria and correspond to a low-risk level. This assessment serves as a basis for the organization’s risk mitigation process. More information is available on the Ministry of Agriculture’s website in the “Forestry Sector” section: **Assessment of Forest Biomass Compliance with Sustainability Criteria. (**https://www.zm.gov.lv/lv/media/17672/download?attachment)</p> <p>**Supplier Selection and Control** - Suppliers are selected from companies holding **FSC FM** or **FSC CoC (100%)** certification. - **FSC Principles and Criteria** ensure requirements for the conservation of valuable ecosystems, nature protection, and protection of particularly sensitive areas. - Suppliers submit a signed questionnaire ***Data on</p>

	<p>Wood Origin, Legality, and Species***, confirming the origin, legality, and compliance of the material with EU RED requirements. **Organizational Verification Process** - Annual internal audits are conducted to verify biomass origin and compliance with **RED 29.6 (vi^{1,2,3,4,6})** criteria.</p> <p>- Verification is performed using: - **Ozols data system**, - **Environmental Protection Authority databases**, - Other available environmental data sources. - On-site audits at suppliers or forest management units are conducted if necessary. - The organization collaborates with local scientific and environmental institutions for expertise. **Risk Mitigation for FSC CW and Self-Controlled Wood** - **LSEZ SIA LASKANA** implements a SBP EU RED compliant risk mitigation process (Level B at the forest sourcing area) using the questionnaire **"Forest Stand and Potential Risk Assessment"**. - The questionnaire is based on **RED III Level A Risk Assessment for Latvia Forest (SBP-RED-EU-LV-FOR v1.0 Draft)** guidelines. - Ensures systematic identification and assessment of forest management risks, guaranteeing compliance with **SBP EU RED standards** and applicable legal requirements. **Exclusion Criteria** Suppliers are excluded if it is found that: - Biomass is sourced from primary or old-growth forests (Stands that correspond to old-growth forest age classes. Classification is accordingly divided into age classes, taking into account the age of the dominant tree species); - Biomass is sourced from high biodiversity forests, violating nature protection requirements; - Biomass is sourced from natural or non-natural grasslands without promoting their conservation; - Biomass is sourced from heathlands; - Biomass is sourced from peatlands, causing drainage or degradation; - Biomass does not comply with RED 29.6 (vi^{1,2,3,4,6}) requirements.</p>
<p>(vi)³ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.</p> <p><i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i></p> <p><i>(d) highly biodiverse grassland spanning more than one hectare that is: (i) natural, namely grassland that would remain grassland in the absence of human intervention and that maintains the natural species composition and ecological characteristics and processes; or (ii) non-natural, namely grassland that would cease to be grassland in the absence of human intervention and that is species-rich and not degraded and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the harvesting of the raw material is necessary to preserve its status as highly biodiverse grassland.</i></p>	
<p>Type of Risk Assessment used</p>	<p><input type="checkbox"/> Level A – proof at national or sub-national level</p> <p><input checked="" type="checkbox"/> Level B – management system at forest sourcing area level</p>
<p>Level A risk assessment description</p>	<p>N/A</p>
<p>Level B management system at the level of the forest sourcing area</p>	<p>The indicative assessment prepared by the Ministry of Agriculture indicates that Latvian legislation and supervisory systems ensure compliance with the key RED III sustainability criteria and correspond to a low-risk level. This assessment serves as a basis for the organization's</p>

risk mitigation process. More information is available on the Ministry of Agriculture's website in the "Forestry Sector" section: **Assessment of Forest Biomass Compliance with Sustainability Criteria.** (<https://www.zm.gov.lv/lv/media/17672/download?attachment>)

Supplier Selection and Control - Suppliers are selected from companies holding **FSC FM** or **FSC CoC (100%)** certification. - **FSC Principles and Criteria** ensure requirements for the conservation of valuable ecosystems, nature protection, and protection of particularly sensitive areas. - Suppliers submit a signed questionnaire **"Data on Wood Origin, Legality, and Species"**, confirming the origin, legality, and compliance of the material with EU RED requirements. **Organizational Verification Process** - Annual internal audits are conducted to verify biomass origin and compliance with **RED 29.6 (vi^{1,2,3,4,6})** criteria. - Verification is performed using: - **Ozols data system**, - **Environmental Protection Authority databases**, - Other available environmental data sources. - On-site audits at suppliers or forest management units are conducted if necessary. - The organization collaborates with local scientific and environmental institutions for expertise. **Risk Mitigation for FSC CW and Self-Controlled Wood** - **LSEZ SIA LASKANA** implements a SBP EU RED-compliant risk mitigation process (Level B at the forest sourcing area) using the questionnaire **"Forest Stand and Potential Risk Assessment"**. - The questionnaire is based on **RED III Level A Risk Assessment for Latvia Forest (SBP-RED-EU-LV-FOR v1.0 Draft)** guidelines. - Ensures systematic identification and assessment of forest management risks, guaranteeing compliance with **SBP EU RED standards** and applicable legal requirements. **Exclusion Criteria** Suppliers are excluded if it is found that: - Biomass is sourced from **primary or old-growth forests** (Stands that correspond to old-growth forest age classes. Classification is accordingly divided into age classes, taking into account the age of the dominant tree species); - Biomass is sourced from **high biodiversity forests**, violating nature protection requirements; - Biomass is sourced from **natural or non-natural grasslands** without promoting their conservation; - Biomass is sourced from **heathlands**; - Biomass is sourced from **peatlands**, causing drainage or degradation; - Biomass **does not comply with RED 29.6 (vi^{1,2,3,4,6})** requirements.

(vi)⁴ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.

Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

*(e) **heathland** - Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).*

Type of Risk Assessment used	<input type="checkbox"/> Level A – proof at national or sub-national level <input checked="" type="checkbox"/> Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	<p>The indicative assessment prepared by the Ministry of Agriculture indicates that Latvian legislation and supervisory systems ensure compliance with the key RED III sustainability criteria and correspond to a low-risk level. This assessment serves as a basis for the organization's risk mitigation process. More information is available on the Ministry of Agriculture's website in the "Forestry Sector" section: Assessment of Forest Biomass Compliance with Sustainability Criteria. (https://www.zm.gov.lv/lv/media/17672/download?attachment)</p> <p>Supplier Selection and Control - Suppliers are selected from companies holding FSC FM or FSC CoC (100%) certification. - FSC Principles and Criteria ensure requirements for the conservation of valuable ecosystems, nature protection, and protection of particularly sensitive areas. - Suppliers submit a signed questionnaire "Data on Wood Origin, Legality, and Species", confirming the origin, legality, and compliance of the material with EU RED requirements. Organizational Verification Process - Annual internal audits are conducted to verify biomass origin and compliance with RED 29.6 (vi^{1,2,3,4,6}) criteria. - Verification is performed using: - Ozols data system, - Environmental Protection Authority databases, - Other available environmental data sources. - On-site audits at suppliers or forest management units are conducted if necessary. - The organization collaborates with local scientific and environmental institutions for expertise. Risk Mitigation for FSC CW and Self-Controlled Wood - LSEZ SIA LASKANA implements a SPB EU RED compliant risk mitigation process (Level B at the forest sourcing area) using the questionnaire "Forest Stand and Potential Risk Assessment". - The questionnaire is based on RED III Level A Risk Assessment for Latvia Forest (SBP-RED-EU-LV-FOR v1.0 Draft) guidelines. - Ensures systematic identification and assessment of forest management risks, guaranteeing compliance with SBP EU RED standards and applicable legal requirements. Exclusion Criteria Suppliers are excluded if it is found that: - Biomass is sourced from primary or old-growth forests (Stands that correspond to old-growth forest age classes. Classification is accordingly divided into age classes, taking into account the age of the dominant tree species); - Biomass is sourced from high biodiversity forests, violating nature protection requirements; - Biomass is sourced from natural or non-natural grasslands without promoting their conservation; - Biomass is sourced from heathlands; - Biomass is sourced from peatlands, causing drainage or degradation; - Biomass does not comply with RED 29.6 (vi^{1,2,3,4,6}) requirements.</p>

(vi)⁵ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.

*Article 29 (4): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status: (a) **wetlands**, namely land that is covered with or saturated by water permanently or for a significant part of the year (NOTE: Evidence of verification of wetlands should reflect seasonal changes within a year).*

Type of Risk Assessment used

- Level A – proof at national or sub-national level
- Level B – management system at forest sourcing area level

Level A risk assessment description

SBP-RED-EU-LV-FOR_v1.0 REDIII Level A for Latvia FOR

Level B management system at the level of the forest sourcing area

N/A

(vi)⁶ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.

*Article 29 (5): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was **peatland** in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.*

Type of Risk Assessment used

- Level A – proof at national or sub-national level
- Level B – management system at forest sourcing area level

Level A risk assessment description

N/A

Level B management system at the level of the forest sourcing area

The indicative assessment prepared by the Ministry of Agriculture indicates that Latvian legislation and supervisory systems ensure compliance with the key RED III sustainability criteria and correspond to a low-risk level. This assessment serves as a basis for the organization's risk mitigation process. More information is available on the Ministry of Agriculture's website in the "Forestry Sector" section: ****Assessment of Forest Biomass Compliance with Sustainability Criteria.** (****<https://www.zm.gov.lv/lv/media/17672/download?attachment>**)

****Supplier Selection and Control**** - Suppliers are selected from companies holding ****FSC FM**** or ****FSC CoC (100%)**** certification. - ****FSC Principles and Criteria**** ensure requirements for the conservation of valuable ecosystems, nature protection, and protection of particularly sensitive areas. - Suppliers submit a signed questionnaire ****"Data on Wood Origin, Legality, and Species"**, confirming the origin, legality, and compliance of the material with EU RED requirements. ****Organizational Verification Process**** - Annual internal audits are conducted to verify biomass origin and compliance with ****RED 29.6 (vi^{1,2,3,4,6})**** criteria. - Verification is performed using: - ****Ozols data system****, - ****Environmental Protection Authority databases****, - Other available**

	<p>environmental data sources. - On-site audits at suppliers or forest management units are conducted if necessary. - The organization collaborates with local scientific and environmental institutions for expertise. **Risk Mitigation for FSC CW and Self-Controlled Wood** - **LSEZ SIA LASKANA** implements a **SBP EU RED compliant risk mitigation process (Level B at the forest sourcing area)** using the questionnaire **“Forest Stand and Potential Risk Assessment”**. - The questionnaire is based on **RED III Level A Risk Assessment for Latvia Forest (SBP-RED-EU-LV-FOR v1.0 Draft)** guidelines. - Ensures systematic identification and assessment of forest management risks, guaranteeing compliance with **SBP EU RED standards** and applicable legal requirements. **Exclusion Criteria** Suppliers are excluded if it is found that: - Biomass is sourced from **primary or old-growth forests** (Stands that correspond to old-growth forest age classes. Classification is accordingly divided into age classes, taking into account the age of the dominant tree species); - Biomass is sourced from **high biodiversity forests**, violating nature protection requirements; - Biomass is sourced from **natural or non-natural grasslands** without promoting their conservation; - Biomass is sourced from **heathlands**; - Biomass is sourced from **peatlands**, causing drainage or degradation; - Biomass **does not comply with RED 29.6 (vi^{1,2,3,4,6})** requirements.</p>
<p>(vii) that installations producing biomass fuels from forest biomass, issue a statement of assurance, underpinned by company-level internal processes, for the purpose of the audits conducted pursuant to Article 30(3), that the forest biomass is not sourced from the lands referred to in point (vi).</p>	
<p>Type of Risk Assessment used</p>	<p><input checked="" type="checkbox"/> Level A – proof at national or sub-national level <input type="checkbox"/> Level B – management system at forest sourcing area level</p>
<p>Level A risk assessment description</p>	<p>N/A</p>
<p>Level B management system at the level of the forest sourcing area</p>	<p><i>Not applicable, requirement only applies to Level A</i></p>

<p>LULUCF criteria 29(7)</p>	
<p>Type of Risk Assessment used</p>	<p><input checked="" type="checkbox"/> Level A – proof at national or sub-national level <input type="checkbox"/> Level B – management system at forest sourcing area level</p>
<p>Level A risk assessment description</p>	<p>SBP-endorsed REDII Level A risk assessment for Article 29(7) LULUCF</p>
<p>Level B management system at the level of the forest sourcing area</p>	<p>N/A</p>

<p>Countries where EU RED Supply Base Evaluation is used</p>	
<p>Country</p>	<p>Latvia</p>

Area	Latvia
Sustainable harvesting criteria 29(6)	
(i) The legality of harvesting operations	
Type of Risk Assessment used	<input checked="" type="checkbox"/> Level A – proof at national or sub-national level <input type="checkbox"/> Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-EU-LV-FOR_v1.0 REDIII Level A for Latvia FOR
Level B management system at the level of the forest sourcing area	N/A
(ii) Forest regeneration of harvested areas	
Type of Risk Assessment used	<input checked="" type="checkbox"/> Level A – proof at national or sub-national level <input type="checkbox"/> Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-EU-LV-FOR_v1.0 REDIII Level A for Latvia FOR
Level B management system at the level of the forest sourcing area	N/A
(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grasslands, heathland and peatlands, are protected with the aim of preserving biodiversity and preventing habitat destruction, unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes	
Type of Risk Assessment used	<input type="checkbox"/> Level A – proof at national or sub-national level <input checked="" type="checkbox"/> Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	See above
(iv) that harvesting is carried out considering the maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth forests as defined in the country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located, and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with requirements to use logging systems that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and habitats	
Type of Risk Assessment used	<input type="checkbox"/> Level A – proof at national or sub-national level <input checked="" type="checkbox"/> Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	See above
(v) That harvesting maintains or improves the long-term production capacity of the forest.	

Type of Risk Assessment used	<input type="checkbox"/> Level A – proof at national or sub-national level <input checked="" type="checkbox"/> Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	See above
<p>(vi)¹ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.</p> <p><i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i></p> <p><i>(a) primary forest and other wooded land and old growth forest, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located. If there is no definition of old growth forest at the national level, then the following definition shall apply: A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.</i></p>	
Type of Risk Assessment used	<input type="checkbox"/> Level A – proof at national or sub-national level <input checked="" type="checkbox"/> Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	See above
<p>(vi)² That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.</p> <p><i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i></p> <p><i>(b) highly biodiverse forest and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.</i></p>	
Type of Risk Assessment used	<input type="checkbox"/> Level A – proof at national or sub-national level <input checked="" type="checkbox"/> Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	See above
<p>(vi)³ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.</p> <p><i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i></p>	

(d) **highly biodiverse grassland** spanning more than one hectare that is: (i) natural, namely grassland that would remain grassland in the absence of human intervention and that maintains the natural species composition and ecological characteristics and processes; or (ii) non-natural, namely grassland that would cease to be grassland in the absence of human intervention and that is species-rich and not degraded and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the harvesting of the raw material is necessary to preserve its status as highly biodiverse grassland.

Type of Risk Assessment used	<input type="checkbox"/> Level A – proof at national or sub-national level <input checked="" type="checkbox"/> Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	See above

(vi)⁴ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.

Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

(e) **heathland** - Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).

Type of Risk Assessment used	<input type="checkbox"/> Level A – proof at national or sub-national level <input checked="" type="checkbox"/> Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	See above

(vi)⁵ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.

Article 29 (4): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:

(a) **wetlands**, namely land that is covered with or saturated by water permanently or for a significant part of the year (NOTE: Evidence of verification of wetlands should reflect seasonal changes within a year).

Type of Risk Assessment used	<input checked="" type="checkbox"/> Level A – proof at national or sub-national level <input type="checkbox"/> Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-EU-LV-FOR_v1.0 REDIII Level A for Latvia FOR
Level B management system at the level of the forest sourcing area	N/A

(vi)⁶ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.

*Article 29 (5): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was **peatland** in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.*

Type of Risk Assessment used	<input type="checkbox"/> Level A – proof at national or sub-national level <input checked="" type="checkbox"/> Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	See above
(vii) that installations producing biomass fuels from forest biomass, issue a statement of assurance, underpinned by company-level internal processes, for the purpose of the audits conducted pursuant to Article 30(3), that the forest biomass is not sourced from the lands referred to in point (vi).	
Type of Risk Assessment used	<input checked="" type="checkbox"/> Level A – proof at national or sub-national level <input type="checkbox"/> Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	<i>Not applicable, requirement only applies to Level A</i>

LULUCF criteria 29(7)

Type of Risk Assessment used	<input checked="" type="checkbox"/> Level A – proof at national or sub-national level <input type="checkbox"/> Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-endorsed REDII Level A risk assessment for Article 29(7) LULUCF
Level B management system at the level of the forest sourcing area	N/A

Annex 2a: EU RED II Supply Base Evaluation

Annex 3: SBP Processing residues and/or Post-consumer feedstock requirements

Not Applicable (Processing Residues and/or post-consumer feedstock not used)

Verification and monitoring of suppliers

The organization conducts verification and monitoring of suppliers of secondary biomass (processing residues from sawmills). A detailed verification and monitoring process is outlined in the procedure developed by LSEZ Ltd LASKANA.

The verification and monitoring process includes the following:

- Supplier audit;
- A self-declaration from the supplier, signed by them;
- A signed questionnaire submitted by the supplier, providing data on the origin, legality, and species of the tree.

The supplier must demonstrate that the material was not intentionally produced, and that the production process was not deliberately altered to generate additional secondary material. The supplier ensures compliance with national and regional legislation and can provide documentation for all deliveries.

LSEZ Ltd Laskana has 2 suppliers of processing residues. The processing residues are supplied with FSC Mix Credit claim. Organisation has signed the agreements with both suppliers. Name, address and supplier type is known. Self-declarations are available. All feedstock is visually inspected upon receipt.

Feedstock inspection and classification upon receipt

The organization ensures the monitoring and documentation of physical input quantities. LSEZ Ltd LASKANA maintains all procurement and other relevant documentation for biomass supplies. The volumes are compared with the actual biomass produced to verify that the biomass has undergone post-processing. The inspection and classification of raw materials according to procurement documentation are outlined in the procedure developed by LSEZ Ltd LASKANA.

Supplier audit for processing residues and post-consumer feedstock

The organization performs annual audits of SBP secondary biomass suppliers. It evaluates and tests all raw materials provided by the audited supplier. Documentation and other evidence related to the volume, quality, origin, and compliance of the raw materials with SBP RED II secondary biomass standards are verified. The process for auditing the biomass post-processing supplier is outlined in the company's procedure. Suppliers acknowledge that auditors from certification bodies, inspectors from authorities (to assess the auditor's performance), or SBP may verify compliance with SBP requirements within the company.

LSEZ Ltd LASKANA has audited both suppliers of processing residues on-site. Audit process is documented. The feedstock is visually inspected. Annual supplier audit is planned.

Annex 4: EU RED detailed findings for Trees Outside Forest (TOF) feedstock

NOTE: For “Trees outside forests (TOF) – Urban and landscape feedstock” no EU RED sustainability requirements apply, only the GHG savings criteria apply (SBP EU RED Bridging ID v2.0 Section 1.1). The land use category in this case is neither forest land nor agricultural land. For “Trees outside forests (TOF) – Agricultural land feedstock” the applicable criteria are Article 29 paragraphs (2)-(5).

Not Applicable (RED II TOF not included)

Annex 4a: RED II detailed findings for Trees Outside Forest (TOF) feedstock

NOTE: For “Trees outside forests (TOF) – Urban and landscape feedstock” no REDII sustainability requirements apply, only the GHG savings criteria apply (SBP REDII Bridging ID Section 4.2). The land use category in this case is neither forest land nor agricultural land. For “Trees outside forests (TOF) – Agricultural land feedstock” the applicable criteria are Article 29 paragraphs (2)-(5).