



Lithuania



Sustainable Biomass Program (SBP)

Revised Regional Risk Assessment for Lithuania



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In the case of inconsistency between translations, the official English language version shall always take precedence.

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Abbreviations

AAC	Annual allowable cut
CEDEFOP	European Centre for the Development of Vocational Training
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
COC	Chain of custody
EC	European Commission
ECRI	European Commission against Racism and Intolerance
EEC	European Economic Community
EPA	Environmental Protection Agency
EPD	Environmental Protection Department
EU	European Union
EUR	Euro
EURES	European Employment Services
EUTR	European Union Timber Regulation
FPIC	Free, prior, and informed consent
FSC	Forest Stewardship Council
GDP	Gross domestic product
GHG	Greenhouse gas
GIS	Geographical information system
GM	Genetically modified
GMO	Genetically modified organism
HCV	High conservation value
ID	Identity
ILO	International Labour Organisation
IPCC	Intergovernmental Panel on Climate Change
IPM	Integrated pest management
KP	Kyoto Protocol
LITAR	Lietuvos Respublikos Integruotas Tarifas (The Integrated Tariff of the Republic of Lithuania)
LPSK	Lietuvos Profesinių Sąjungų Konfederacija (Lithuanian Trade Union Confederation)
LULUCF	Land use, land use change, and forestry
N.A.	Not applicable
NDC	Nationally determined contribution
NECP	National Energy and Climate Plan
NFI	National forest inventory
NGO	Non-governmental organisation
OHS	Occupational health and safety
PEFC	Programme for the Endorsement of Forest Certification
QR	Quick response
RED	Renewable Energy Directive
RRA	Regional Risk Assessment
SBP	Sustainable Biomass Program
SI	Site index
UK	United Kingdom
UN	United Nations
UNESCO	United Nations Educational, Scientific and Cultural Organisation
UNFCCC	United Nations Framework Convention on Climate Change
VAT	Value-added tax
VMU	Valstybinių Miškų Urėdija (State Forest Enterprise)
WAM	With additional measures
WEM	With existing measures
WKH	Woodland key habitat

Foreword

Regional Risk Assessments (RRAs) are a key part of SBP's focus on identifying and managing risks associated with sustainably sourcing feedstock for biomass production. With an RRA covering an entire geographic region, and determining the risks associated with sourcing feedstock from that region, the need for individual Biomass Producers to conduct risk assessments is avoided, leading to an efficient and consistent risk assessment process. RRAs also ensure active engagement with a diverse range of stakeholders in the region.

SBP-endorsed RRAs remain valid for a period of five (5) years from their publication date. The SBP Regional Risk Assessment Procedure allows for the development of new RRAs, and the review and revision of existing SBP-endorsed RRAs. The need for review and revision may be triggered by new or updated information, changes in legislation, stakeholder feedback, revision of SBP Standards 1 and 2, or expiry of the validity of the SBP-endorsed RRA.

As a result of the Standards Development Process launched in May 2020, both SBP Standards 1 and 2 were revised, thus triggering the review of all existing SBP-endorsed RRAs. A Working Body (WB) was appointed for each of the existing SBP-endorsed RRAs and was responsible for their review and revision. Indufor Oy was appointed by SBP to review and revise the SBP-endorsed RRA for Lithuania (v1.0).

A revised RRA is subject to public consultation. The WB is responsible for holding the first public consultation of the revised RRA, following which amendments are made, if necessary, and the revised RRA submitted to SBP. The SBP Technical Committee reviews the revised RRA, which is then subject to a second public consultation held by SBP. Subject to any amendments following the second public consultation SBP, in consultation with its Technical Committee, considers the revised RRA for endorsement.

This SBP-endorsed RRA for Lithuania is aligned with the requirements of SBP Standards 1 and 2 (v2.0), and the requirements of the re-cast EU Renewable Energy Directive (REDII) relating to feedstock compliance. Note that to produce REDII-compliant biomass, Biomass Producers must comply with the relevant SBP Standards and Instruction Document REDII: Bridging Requirements for Meeting REDII. Compliance with REDII requirements is mandatory for all Certificate Holders.

1 Introduction

The Sustainable Biomass Program (SBP) has endorsed Regional Risk Assessments (RRAs) for several countries and territories including Lithuania.

This report describes the revision of the SBP-endorsed Regional Risk Assessment for Lithuania published as version 1.1 (v1.1) which was published in June 2021. The current round of updating was conducted in accordance with the recently updated SBP Regional Risk Assessment Procedure (v1.2) and draws on criteria and indicators set out in Standard 1: Feedstock Compliance (v2.0) and by taking into account Standard 2: Feedstock Verification v2.0 (May 2023).

Standard 2 is particularly helpful in defining and determining the risk classes i.e. low risk and specified risk for the indicators.

The revision covers all indicators in the new Standard 1 many of which are new or revised. The data sources for other indicators are also reviewed and revised.

This revision draws on many sources of information, including applicable legislation, reports from state authorities and other stakeholders, various databases as well as statistical data sources.

For each criterion, detailed descriptions and analyses are presented and a risk class is assigned to each indicator as set out in Annex 1. The revised draft of the RRA has been prepared by a Working Body comprising four forestry and certification experts from Indufor with the support of an independent expert on Lithuanian forestry expert hired by Indufor.

2 Regional background and statement of scope

2.1 Regional background

The territory of Lithuania (Figure 2.1) forms part of the boreal and continental regions in the European biogeographical region classification, being 'halfway between' each. The Ministry of Environment and the State Service for Protected Areas is responsible for reporting to the EU Commission in relation to Lithuania's Natura 2000 conservation areas.

According to the Lithuanian National Forest Inventory (NFI) conducted by the Lithuanian State Forest Service, the area of forest land in the country is 2.2 million ha making up 34% of the total land area (Ministry of Environment & State Forest Service, 2023). The total growing stock of Lithuanian forests was 567 million m³ in 2021. About 56% of the forest area is dominated by coniferous trees and 44% by deciduous trees. About 25% of forest stands are young, 42% medium-aged, 14% maturing, and 19% mature. Lithuanian forest land is divided into four categories in terms of its protection level: reserves (1%), special purposes (11.5%), protected (12.5%), and commercial (75%). Most of the forests with limitations on management are state-owned.

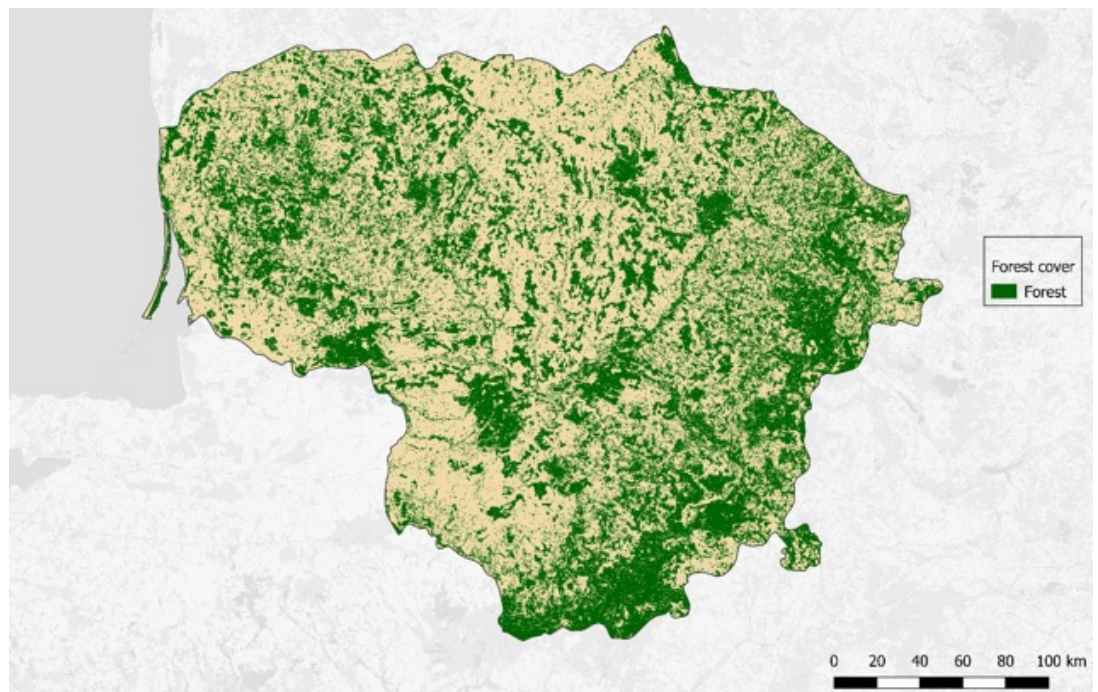
Forest ownership by area is divided as follows: state-owned forests (51%), private forests (42%), and forests awaiting restitution (7%) (Ministry of Environment & State Forest Service, 2023).

Most of the state-owned forests are managed by the State Forest Enterprise (VMU, Valstybinių miškų urėdija). Some state forests are also managed by municipalities as well as the ministries of National Defence and Communication. The state-owned forests are FSC-certified (State Forest Enterprise: "FSC sertifikavimas").

For management purposes, VMU's forests are split into 26 regional subdivisions (Ministry of Environment & State Forest Service, 2023). There are no PEFC-certified forests in Lithuania, as the country does not have an endorsed national PEFC standard (PEFC: "PEFC Lithuania"). The proportion of private forests that are certified is relatively small; the average size of a private forest holding is a little over 3 ha and the cost-benefit ratio of getting such a small holding certified is not attractive. However, the emergence of group certification in Lithuania now makes it easier for small forest owners to get certified (Darnūs miškai: "Didėja sertifikuotų miškų plotai").

Given the above context, Lithuania is considered as homogenous regarding SBP risks so the RRA assessment does not require further sub-scoping. Where differences regarding forest ownership are identified it is explicitly noted under the findings of the relevant indicators in Annex 1.

Figure 2.1 Map of Lithuania¹



¹ Forest cover: © ESA WorldCover project [2021] / Contains modified Copernicus Sentinel data ([2021]) processed by ESA WorldCover consortium; Administrative boundaries: made with Natural Earth; Base map: Map tiles by CartoDB, under CC BY 3.0. Data by OpenStreetMap, under ODbL.

2.2 Statement of scope

The geographical scope of this revision covers the entire territory of the Republic of Lithuania. As in the earlier version of the RRA (2021), this revision covers wood-based primary feedstock² from forests including forest residues³. Processing residues⁴ that have been produced from wood (i.e. raw materials) harvested in Lithuania are also covered by this revision. All imported feedstock and processing residues from raw materials that originate outside Lithuania are excluded from this RRA.

The revision covers all forests in Lithuania. According to the Law on Forests (1994), forest land is defined as 'land covered by forest (stands) or not covered by forest (cleared areas, perished stands, forest meadows, nurseries, seed-plots, seed orchards and raw shrubbery and plantations)'.

The Law on Forests defines the forest as 'a tract of land not less than 0.1 ha, covered by trees or other forest vegetation or temporary loss of it (cleared or burned areas)'. The following are not defined as forest: clusters of trees situated in fields, by roadsides, water bodies, within towns or rural settlements as well as cemeteries, narrow tree lines (up to 10 metres in width), hedges, single trees and shrubs as well as parks planted by man which are situated within towns and rural settlements.

Trees outside forests are excluded from the scope of this revision. As per SBP's guidance, trees outside forests refers to trees on land not defined as forests under national legislation. According to SBP's Glossary of Terms and Definitions (v2.0), trees outside forests are defined as those 'trees on land not defined as forest under national legislation. This may include agricultural land, including meadows and pasture, built-on land (including settlements and infrastructure), parks and recreational areas and barren land (including sand dunes and rocky outcroppings)'.

2.3 Overview of the local biomass sector

The gross consumption of wood-based biomass in Lithuania in 2020 was 6.4 million m³ (Ministry of Environment & State Forest Service, 2023). Wood-based biomass is an important energy source in Lithuania: 25% of gross energy consumed in the country was produced from renewable sources in 2020 with wood making up approximately 80% of the total consumption of renewables (Ministry of Environment & State Forest Service, 2023). The use of biomass for energy is promoted in the national policies and planning processes and the demand for wood-based biomass is expected to rise in the future which, depending on the market situation, might in turn lead to an increase in logging and imports (Ministry of Transport and Communications, 2020).

- 2 The primary feedstock is defined as suggested by SBP Glossary of Terms and Definitions (v2.0, May 2023): 'Feedstock resulted from forestry operations and harvesting of trees from non-forest sourcing areas.'
- 3 According to SBP Glossary of Terms and Definitions (v2.0, May 2023), 'a forest residue is a feedstock directly generated in the forest for which there is no alternative use. These residues do not include residues from related industries or processing. Examples include feedstock comprising branch wood, diseased wood and storm salvage from natural disturbances, end of life timber plantations, or tree tops'.
- 4 Processing residues are defined – as per the SBP Glossary of Terms and Definitions (v2.0, May 2023) – as the feedstock such as bark, sawdust, slab wood or residues arising from a primary or secondary wood processor; any wood rejected by a sawmill. Sawdust, shavings produced during the processing of wood at the sawmill/wood industry. Chips, offcuts produced during the processing of wood at the sawmill / wood industry, that may include small offcuts or also bark that has been stripped from the wood.

Financial support for renewable energy in the form of e.g. loans and subsidies for private entities is available (Lithuanian Energy Agency: “Financial support for private legal entities”).

According to Statistics Lithuania, the importance of wood as fuel for energy has increased significantly during the 2000s in Lithuania along with the overall increase in the share of renewable energy (Statistics Lithuania: “The share of energy from renewable sources”, “Total gross electricity production from renewables”, “Total gross heat production from renewables”).

There are three major wood biomass-consuming CHP plants in Lithuania: one in Vilnius, one in Kaunas, and one in Klaipėda. Wood-based biomass is also an important fuel for district heating which serves about 60% of Lithuanian citizens (Lithuanian District Heating Association 2019). Regardless of fuel type, most of the heat plants have a relatively small capacity with the CHP plants being larger; the biomass unit of the largest of them (Vilnius CHP) has a total power capacity up to 80 MWe and a total heat capacity up to 175 MWt (Vilnius Combined Heat and Power Plant: “About the plant”).

3 Methodology

3.1 Data collection

Necessary data for this RRA revision is collected mainly through desktop searches from a range of sources. The sources include applicable Lithuanian and EU policies, legislation and regulations, reports and articles from relevant Lithuanian ministries and state authorities, NGO and industry bodies, various databases as well as technical and scientific reports. Notable Lithuanian ministries and state authorities from which data is collected include the Ministry of Agriculture, the Ministry of Environment, the Ministry of Energy, the Ministry of Social Security and Labour, the Ministry of Justice, Statistics Lithuania, the State Forest Service, the State Environmental Protection Agency, Environmental Protection Department, the State Service for Protected Areas, the State Forest Enterprise, the State Labour Inspectorate and the State Tax Inspectorate. Support from the Lithuanian forestry and certification expert was taken for identifying the data sources and collecting the data.

The data used in this revision is validated by cross-checking with multiple sources whenever possible. Support from the Lithuanian forestry and certification expert is also taken for validating the data.

3.2 Selection of indicators to be updated

Updated SBP Standards 1–6 were approved in March 2023 following a comprehensive review process. The updated criteria and indicators in Standard 1: Feedstock Compliance now form version 2.0 (v2.0) and these provide the framework for undertaking a new Supply Base Evaluation (SBE) which is presented in detail in Annex 1.

Standard 1 (v2.0) includes 10 new indicators and most other indicators from v1.0 have been revised. The availability of new information relevant to nearly all indicators meant that some level of updating of the previous Lithuanian RRA (2021) was necessary.

The three levels of update are categorised as follows:

- **New addition:** For the new indicators in Standard 1 (v2.0) detailed analysis is conducted, evidence is compiled, and conclusions are made.
- **Major update:** For the revised indicators in Standard 1 (v2.0) that were partially aligned with the indicators assessed in the previous Lithuanian RRA (2021), a new SBE assessment has been made including an information review, analysis and updated risk classification.
- **Minor update:** For the revised indicators in Standard 1 (v2.0) that are fully aligned with indicators from the original Lithuanian RRA (2021), the information in the detailed findings of the SBE assessments is updated. Originally assigned risk classes are reviewed and changed when necessary.

The level of update done for each indicator is given in tables 3.1 to 3.4 on the following pages.

Table 3.1:

Principle 1 – Feedstock is legally sourced		
Criterion 1.1 – Operators and operations are legal		
Indicator in SBP Standard 1 (v2.0)	Matching indicator in RRA Lithuania (June 2021)	Level of update
1.1.1: Operations related to feedstock sourcing and biomass production shall comply with all applicable and existing laws and regulations.	None.	New addition
1.1.2: Legal ownership of land and resource use rights shall be respected.	1.2.1: Legality of ownership and land use can be demonstrated for the Supply Base.	Major
1.1.3: Feedstock shall be legally harvested, supplied and produced, including in compliance with CITES, EUTR and other applicable legal trade requirements.	1.3.1: Feedstock is legally harvested and supplied and is in compliance with EUTR legality requirements. 1.5.1: Feedstock is supplied in compliance with the requirements of CITES.	Major
1.1.4: Payments for harvest rights and feedstocks, including duties, relevant royalties and taxes related to timber harvesting shall be complete and up to date.	1.4.1: Payments for harvest rights and timber, including duties, relevant royalties and taxes related to timber harvesting, are complete and up to date.	Minor
1.1.5: There shall be adequate protection of the supply base from unauthorised and illegal activities, such as illegal logging, mining, and encroachment.	2.4.3: There is adequate protection of the forest from unauthorised activities, such as illegal logging, mining and encroachment.	Minor

Table 3.2:

Principle 2 – Feedstock sourcing does not harm the environment		
Criterion 2.1 – Biodiversity is maintained or enhanced		
Indicator in SBP Standard 1 (v2.0)	Matching indicator in RRA Lithuania (June 2021)	Level of update
2.1.1: Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the supply base shall be identified.	2.1.1: Forests and other areas with high conservation values in the Supply Base are identified and mapped.	Major
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.	2.1.2: Potential threats to forests and other areas with high conservation values from forest management activities are identified and addressed.	Major
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.	2.2.4: Biodiversity is protected.	Major
Criterion 2.2 – Ecosystem productivity, functions, and services are maintained or enhanced		
Indicator in SBP Standard 1 (v2.0)	Matching indicator in RRA Lithuania (June 2021)	Level of update
2.2.1: Feedstock shall not be sourced from land that had one of the following statuses in January 2008 and no longer has that status due to land conversion: (a) forests, (b) peatlands, (c) wetlands and (d) highly biodiverse grassland.	2.1.3: Feedstock is not sourced from forests converted to production plantation forest or non-forest lands after January 2008.	Major
2.2.2: Ecosystems, their health, vitality, functions and services in the supply base shall be maintained or enhanced.	2.2.3: Key ecosystems and habitats are conserved or set aside in their natural state.	Major
2.2.3: Soil quality in the supply base shall be maintained or enhanced.	2.2.2: Feedstock is sourced from forests where management maintains or improves soil quality.	Minor
2.2.4: The removal of harvest residues and stumps shall not lead to irreversible negative impacts to the ecosystem.	2.2.5: The process of residue removal minimises harm to ecosystems.	Minor
2.2.5: Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.	2.2.6: Negative impacts on groundwater, surface water, and water downstream from forest management are minimised.	Minor
2.2.6: Air emissions shall comply with national legislation or in the absence of national legislation with industry best practice.	2.2.7: Air quality is not adversely affected by forest management activities.	Minor

2.2.7: Pesticides shall only be used as part of an Integrated Pest Management (IPM) plan in compliance with national legislation, chemical safety data sheets and industry best practice. Banned pesticides shall not be used.	2.2.8: There is controlled and appropriate use of chemicals, and that integrated pest management (IPM) is implemented wherever possible in forest management activities.	Major
2.2.8: Waste shall be disposed of in an environmentally appropriate manner.	2.2.9: Methods of waste disposal minimise negative impacts on forest ecosystems.	Minor
2.2.9: Harvesting levels shall be justified as to how they can be sustained with reference to inventory and growth data for the supply base.	2.3.1: Analysis shows that feedstock harvesting does not exceed the long-term production capacity of the forest, avoids significant negative impacts on forest productivity and ensures long-term economic viability. Harvest levels are justified by inventory and growth data.	Minor
2.2.10: Harvested areas shall be regenerated.	None.	New addition
2.2.11: The impacts of natural processes such as fires, pests and diseases shall be managed.	2.4.2: Natural processes, such as fires, pests and diseases are managed appropriately.	Minor
2.2.12: Genetically modified trees shall not be used.	2.10.1: Genetically modified trees are not used.	Minor

Table 3.3:

Principle 3 – Feedstock is only sourced from supply bases where the forest carbon stock is stable or increasing in the long term

Criterion 3.1 – Feedstock sourcing is consistent with international requirements for land use, land-use change and forestry (LULUCF) emissions

Indicator in SBP Standard 1 (v2.0)	Matching indicator in RRA Lithuania (June 2021)	Level of update
<p>3.1.1: LULUCF emissions shall be accounted for through one of the following routes:</p> <p>Route A: Feedstocks may be sourced from a country of origin which is party to the Paris Agreement, and which has submitted a Nationally Determined Contribution to the United Nations Framework Convention on Climate Change (UNFCCC) covering carbon emissions and removals from agriculture, forestry and land use which ensure the changes in carbon stock associated with biomass harvest are counted towards the country's commitment to reduce or limit greenhouse gas emissions, or</p>	<p>2.9.2: Analysis demonstrates that feedstock harvesting does not diminish the capability of the forest to act as an effective sink or store of carbon over the long term.</p>	Major

<p>Route B: Feedstocks may be sourced from a country of origin which is party to the Paris Agreement and has national or sub-national laws in place, in accordance with Article 5 of the Paris Agreement, applicable in the area of harvest, to conserve and enhance carbon stocks and sinks, and providing evidence that reported LULUCF-sector emissions do not exceed removals, or</p> <p>Route C: Feedstocks may be sourced from a supply base where an assessment demonstrates that both the carbon stocks is stable, and the forests' capacity to act as a carbon sink is stable or increasing over the long term.</p>		
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Criterion 3.2 – Carbon stocks in the forest area of the Supply Base are stable or increasing in the long term

Indicator in SBP Standard 1 (v2.0)	Matching indicator in RRA Lithuania (June 2021)	Level of update
<p>3.2.1: All feedstock sourcing shall be consistent with either of these two options:</p> <p>Option A. Feedstock may be sourced from supply bases where an assessment of the supply base shows that the forest carbon stocks are stable or increasing, or</p> <p>Option B. Feedstock may be sourced, if the assessment shows that the forest carbon stocks are declining in the supply base, provided that the decline is due to natural processes (fire, pests etc.) and sourcing of feedstock has the aim to recover feedstock otherwise lost or assist regeneration.</p>	None.	New addition
<p>3.2.2: Primary feedstock shall not be sourced from forest areas where site productivity is low according to local definitions or norms, the areas are classified as low-productive or difficult to regenerate.</p>	None.	New addition
<p>3.2.3: Primary 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).</p>	<p>2.1.1: Forests and other areas with high conservation values in the Supply Base are identified and mapped.</p> <p>2.9.1: Feedstock is not sourced from areas that had high carbon stocks in January 2008 and no longer have those high carbon stocks.</p>	Major

Criterion 3.3 – Feedstock sourcing shall not compete with wood sourcing for long-lived wood products

Indicator in SBP Standard 1 (v2.0)	Matching indicator in RRA Lithuania (June 2021)	Level of update
3.3.1: Feedstock sourcing shall be in compliance with the principles of cascading use, high-quality stem wood shall not be used as feedstock if it is in substantial demand for long-lived products in the Supply Base.	None.	New addition

Table 3.4:

Principle 4 – Feedstock sourcing benefits people and communities

Criterion 4.1 – Decent working conditions are provided, and labour rights are safeguarded

Indicator in SBP Standard 1 (v2.0)	Matching indicator in RRA Lithuania (June 2021)	Level of update
4.1.1: Freedom of association and the right to collective bargaining shall be respected in the workplace.	2.7.1: Freedom of Association and the effective recognition of the right to collective bargaining are respected.	Major
4.1.2: Forced or compulsory labour shall not be used.	2.7.2: Feedstock is not supplied using any form of compulsory labour.	Major
4.1.3: Child labour shall not be used.	2.7.3: Feedstock is not supplied using child labour.	Major
4.1.4: Workers shall not be discriminated in hiring, remuneration, access to training, promotion, termination or retirement.	2.7.4: Feedstock is not supplied using labour which is discriminated against in respect of employment and occupation.	Major
4.1.5: Wages paid to workers shall meet or exceed the legal minimum wage or where there is no statutory minimum wage industry norms shall be met or exceeded.	2.7.5: Feedstock is supplied using labour where the pay and employment conditions are fair and meet, or exceed, minimum requirements.	Major
4.1.6: Working hours shall comply with legal requirements.	None.	New addition
4.1.7: Workers shall have access to health care provisions, sickness benefits, retirement benefits, invalidity benefits, death benefits, workers' compensation.	None.	New addition
4.1.8: Training shall be provided for all workers to allow them to implement the conditions set out in all elements of the SBP standards relevant to their responsibilities.	2.3.2: Adequate training is provided for all personnel, including employees and contractors.	Minor

4.1.9: Mechanisms shall be in place for resolving grievances and disputes in the workplace.	2.6.1: Appropriate mechanisms are in place for resolving grievances and disputes, including those relating to tenure and use rights, to forest management practices and to work conditions.	Minor
4.1.10: Safeguards shall be put in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures.	2.8.1: Appropriate safeguards are put in place to protect the health and safety of forest workers.	Minor

Criterion 4.2 – Feedstock sourcing benefits communities

Indicator in SBP Standard 1 (v2.0)	Matching indicator in RRA Lithuania (June 2021)	Level of update
4.2.1: Negative social and community impacts shall be identified and avoided.	None.	New addition
4.2.2: Feedstock sourcing shall positively contribute to the local economy, including employment.	2.3.3: Analysis shows that feedstock harvesting and biomass production positively contribute to the local economy including employment.	Major
4.2.3: Food, water supply or high conservation values (HCV) that are essential for the fulfilment of basic needs of communities shall be maintained or enhanced.	2.5.2: Production of feedstock does not endanger food, water supply or subsistence means of communities, where the use of this specific feedstock or water is essential for the fulfilment of basic needs.	Minor
4.2.4: Legal, customary, and traditional tenure and use rights of indigenous people and local communities related to the supply base shall be identified, documented, and respected.	2.5.1: The legal, customary and traditional tenure and use rights of indigenous peoples and local communities related to the forest, are identified, documented and respected.	Major
4.2.5: Mechanisms shall be in place for resolving grievances and disputes, relating to tenure and use rights of the forest and other land management practices.	2.6.1: Appropriate mechanisms are in place for resolving grievances and disputes, including those relating to tenure and use rights, to forest management practices and to work conditions.	Major
4.2.6: Where indigenous peoples' rights are identified in the supply base, and FPIC has not been achieved for the proposed and planned activities, a consultation and, if required, accommodation process shall be put in place.	None.	New addition
4.2.7: Designated cultural heritage sites shall be preserved.	None.	New addition

3.3

Risk classification

Based on collected information (evidence), a thorough analysis was undertaken for each indicator and a low or specified risk class was assigned.

The analysis examined (i) the applicable legislative, regulatory framework or industry best practices on the specific issues addressed by the criterion and indicator in question, (ii) mechanisms for implementation or enforcement, (iii) monitoring procedures (presence or absence and frequency or quality), and (iv) current situation on compliance if the information was available. Additionally, a risk conclusion and justification were given for the risk class assigned for each indicator.

For assigning the risk class to an indicator, we followed the guidance given in SBP Standard 2: Feedstock Verification (v2.0, article 6.3).

- An indicator is assigned with a low-risk class,
 - if legislation that addresses the requirement(s) in SBP Standard 1 exists and is enforced, and legal compliance within the Supply Base can be demonstrated; or
 - in the absence of existing applicable legislation or lack of legal enforcement, by assessing whether the best practice – that demonstrates conformance with the requirements of SBP Standard 1 – is implemented.
- The indicators that ‘cannot be categorised as low risk shall be considered indicators with a specified risk’.

For risk classification of indicators, no sub-scoping was used because the country’s forests under both state and private ownership are considered to be homogenous.

4

Stakeholder consultation

The draft RRA revision was shared with a total of 17 stakeholders in Lithuania (see Annex 4) by email on 21 April 2023. The stakeholders were selected in such a way that all interest groups⁵ specified in SBP Regional Risk Assessment Procedure (v1.2) were represented. The draft was accompanied by a covering letter (see Annex 5). Stakeholders were requested to provide their feedback within 30 calendar days which was by 21 May 2023. The request was considered to have been delivered to all stakeholders as no failure messages to the sender’s email were received.

The majority of stakeholders were also followed up by phone. Face-to-face consultations were conducted with several stakeholders in Lithuania on 30 and 31 May 2023. A total of eight stakeholders out of 17 initially contacted responded to the request to provide feedback. Six stakeholders gave detailed comments and two did not make any comment.

The revised draft RRA revision for Lithuania was prepared based on stakeholders’ feedback (see Annexes 4 and 5). One stakeholder (Environmental Protection Department of the Ministry of Environment) who did not give feedback on the initial revision draft responded to the request for feedback on the revised draft.

⁵ The interest groups are economic, social, environmental, certification bodies, national forest agencies, universities and research institutions, and experts.

This means that a total of nine stakeholders responded to the requests for feedback on the draft and revised draft RRAs and therefore the response rate was 53%. The respondents represent all major interest groups (Table 4.1).

Table 4.1: Detailed breakdown of stakeholders' responses

Group	Request sent	Responded	Response rate %
	Number of stakeholders		
Industry (economic interest)	9	4	50
Regulator (social and environmental interest)	3	2	67
Civil society (social and environmental interest)	2	1	50
Certification body (social and environmental interest)	1	1	100
Academia and research	2	1	50
Total / overall	17	9	53

5 Conclusions

Based on the analysis carried out and the findings related to the indicators (presented in Annex 1), it can be concluded that Lithuania is generally a low-risk country in terms of wood-based feedstock sourcing for biomass production.

Out of the total of 42 indicators, 36 have been assessed to be in a low-risk class and the remaining six to be in a specified risk class. Table 5.1 lists the risk classifications proposed in this final draft RRA revision report.

In this final draft RRA revision the risk class of only one indicator (3.3.1) has been changed (from specified to low) as a result of stakeholder comments and the Working Body's gathering of further evidence.

Please see Annex 5 for the detailed justification for the change.

Table 5.1: Assigned risk classes for the indicators.

Indicator	Assigned risk class	
	Low risk	Specified risk
1.1.1	✓	
1.1.2	✓	
1.1.3	✓	
1.1.4	✓	
1.1.5	✓	

Indicator	Assigned risk class	
	Low risk	Specified risk
2.1.1	✓	
2.1.2	✓	
2.1.3		✓
2.2.1	✓	
2.2.2		✓
2.2.3	✓	
2.2.4	✓	
2.2.5	✓	
2.2.6	✓	
2.2.7	✓	
2.2.8	✓	
2.2.9	✓	
2.2.10	✓	
2.2.11	✓	
2.2.12	✓	
3.1.1	✓	
3.2.1	✓	
3.2.2		✓
3.2.3		✓
3.3.1	✓	
4.1.1	✓	
4.1.2	✓	
4.1.3	✓	
4.1.4	✓	
4.1.5	✓	
4.1.6	✓	
4.1.7	✓	
4.1.8	✓	
4.1.9	✓	
4.1.10		✓
4.2.1	✓	
4.2.2	✓	
4.2.3	✓	
4.2.4	✓	
4.2.5	✓	
4.2.6	✓	
4.2.7	✓	

Annex 1 Detailed findings for Supply Base Evaluation

Principle 1 – Feedstock is legally sourced

Criterion 1.1 – Operators and operations are legal

Element	Description and analysis
1.1.1	<p>Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.</p>
Findings	<p>Scale of assessment The scale of assessment covers all forests in Lithuania.</p> <p>Analysis <i>National law and regulations concerning feedstock sourcing and biomass production</i></p> <p>The Law on Forests (1994) of Lithuania covers all state and privately-owned forests. ‘Forest’ is defined as ‘a tract of land not less than 0.1 ha, covered by trees or other forest vegetation or temporary loss of it (cleared or burned areas)’. ‘Forest land’ is defined as ‘land covered by forest (stands) or not covered by forest (cleared areas, perished stands, forest meadows, nurseries, seed-plots, seed orchards and raw shrubbery and plantations)’.</p> <p>Clusters of trees situated in fields, by roadsides, water bodies, within towns or rural settlements as well as cemeteries, narrow tree lines up to 10 metres in width, hedges, single trees and shrubs as well as parks planted by man, which are situated within towns and rural settlements, are not defined as forest in the Law on Forests.</p> <p>This assessment covers the legally defined forests in Lithuania.</p> <p>The Law on Forests provides the main legislative framework for forestry and forest harvesting in Lithuania. The Forest Cutting Rules (2010) made pursuant to Article 16 of the Law on Forests sets provisions for tree felling in the country. Section 2 of the Rules specifies the minimum harvesting age for different species of trees in various site classes. However, neither the Law itself nor the Rules have any provision directly related to forest-based feedstock sourcing and biomass production. They also do not restrict the use of wood and forest biomass for bioenergy purposes.</p> <p>The decision on the use of wood is made by the forest owners and the managers and is directed by the quality and price of wood. Large forest owners or managers like the State Forest Enterprise⁶ often conduct clear-cuts 15-20 years later than the allowable cut age whereas smallholders tend to wait until roundwood prices are high.</p> <p>The Law on Forests sets definitive boundaries and requirements for forest management. The preparation of a forest management plan (officially called Forest Management Project) is mandatory for each forest estate as per Article 14 of the Law. All forest management activities including forest harvesting must be carried out following the management project. The management projects for private forest estates and state forests are made under the Rules for the Preparation of Forest Management Schemes and Internal Forest Management Projects.</p> <p>To harvest trees fulfilling the age and basal area limits set by the Law, prior permission needs to be obtained from the State Forest Service and all planned harvesting operations have to be advised in advance. The annual cutting limit for state forests is set by the Ministry of Environment. There is no evidence that conventional harvesting rules and regulations are violated in Lithuania on any notable scale.</p>

⁶ State Forest Enterprise manages the state-owned forests in Lithuania. State forests account for over 55% of the country's forest area.

Annex 1 Detailed findings for Supply Base Evaluation continued

1.1.1 continued Findings continued

With the above pieces of evidence, it can be concluded that the forest-based feedstock used for producing pellets in the country is sourced in compliance with the Law on Forests and the regulations outlined in accordance with the law.

Implementation of EU Renewable Energy Directive (REDII) in Lithuania

The EU REDII imposes several requirements concerning the sustainability of forest biomass to be used for energy generation. The requirements concern:

- (i) the legality of harvesting operations
- (ii) forest regeneration of harvested areas
- (iii) that areas designated by law or by the relevant competent authority for nature protection purposes are protected
- (iv) that harvesting is carried out considering the maintenance of soil quality and biodiversity
- (v) that harvesting maintains or improves the long-term production capacity of the forest.

Lithuania does not have any special regulation or legislation to implement the EU REDII (EU 2018/2001) in the country. However, the Law on Forests (1994) and its subsequent regulations and the Law on Protected Areas fully address the above requirements.

Concerning requirement (ii), according to Article 15 of the Law on Forests, a manager, owner or user must regenerate a forest stand after felling or clearance by damage (e.g. fire, disease, wind and floods) from his or her resources. Regeneration may be completed artificially, naturally or as a combination of both means within three years of clearcutting. In the case of forest plantations, any part of the plantation lost or damaged must be replanted within two years after the damage or loss. The Environmental Protection Department enforces the above rule and imposes a fine for non-compliance.

Regarding requirements (iii) and (iv), the protection of nature, key habitats, biodiversity and ecosystems in Lithuania is regulated by the Law on Forests as well as the Law on Protected Areas. According to the Law on Protected areas, tree felling is prohibited in protected areas including those located on forest land. Chapter IX of the above Law forests out the rights and duties of owners, managers and users of land in protected areas.

The European Union published an assessment of the preparation of guidance for the implementation of the new bioenergy sustainability criteria set out in REDII in (February 2021). According to the assessment, the legislation and regulations mentioned above fully address the REDII requirements (i) – (iv) concerning forest biomass and adequate monitoring being in place for enforcement. Stakeholder consultation has not pointed to any shortcomings in the enforcement and monitoring of the legislation and regulations in either private or state forests. Moreover, there is no report of violation of legislation or regulations. Therefore, it can be concluded that the operations related to feedstock sourcing and biomass production comply with all existing applicable laws and regulations as well as the relevant requirements of EU REDII.

Regarding requirement (v), the forest harvesting level in Lithuania remains far below annual growth and thus standing stock is growing. According to the Ministry of Environment and the State Forest Service (2023), the harvesting level is about 55% on average of the annual allowable cut (AAC) of 10 million m³. Given that AAC is set below the annual increment on forest land (20 million m³ in 2021), growing stock in the country has been increasing over the past decades. This means that the current harvesting levels do not compromise long-term production capacity or carbon stock.

Generally, the use of biomass for energy generation is regulated by the biomass sustainability criteria of the EU REDII (EU 2018/2001) and the National Energy and Climate Plan of Lithuania for 2021-2030. The above discussion implies that there is no risk of noncompliance concerning feedstock sourcing with the EU REDII requirements.

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>1.1.1 continued <i>Findings continued</i></p>	<p>Enforcement and monitoring</p> <p>The Environmental Protection Department enforces the Law on Forests and its subsequent regulations while the State Service for Protected Areas enforces the Law on Protected Areas. Regular monitoring of enforcement is conducted and reported by the concerned agencies. As explained in the analysis section above, stakeholder consultation does not point to any shortcomings in the enforcement and monitoring of the legislation and regulations, and operations related to feedstock sourcing and biomass production comply with all existing applicable laws and regulations. This points to there being effective enforcement and monitoring of the relevant legislation and regulations.</p> <p>Risk conclusion and justification</p> <p>Woody feedstock sourcing and biomass production for energy generation in Lithuania – as the above analysis suggests – comply with the applicable national and EU-level laws and regulations. Regular monitoring of such laws and regulations is conducted and reported by designated authorities. Therefore, it is concluded that the risk rating for indicator 1.1.1 is 'low risk'.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> – Relevant webpages of the State Forest Service and the State Service for Protected Areas – Relevant Lithuanian national and EU acts, laws and regulations
<p><i>Evidence reviewed</i></p>	<ul style="list-style-type: none"> – EU Renewable Energy Directive (RED)II – DIRECTIVE (EU) 2018/ 2001 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL – of 11 December 2018 – on the promotion of the use of energy from renewable sources (europa.eu) – Forest Cutting Rules (27.01.2010). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.364764 – Law on Forests (22.11.1994). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.6036/asr – Law on Protected Areas (11.06.2015). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/cf9f9132b60d11e6a3e9de0fc8d85cd8?jfwid – Ministry of Environment and State Forest Service. (2023). Lithuanian Statistical Yearbook of Forestry 2021. Vilnius. – Ministry of Transport and Communications. (2020). National Energy and Climate Plan 2021-2030. https://energy.ec.europa.eu/system/files/2022-08/lt_final_necp_main_en.pdf – Regulations on the Management and Use of Private Forests (24.07.1997). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.41952 – Rules for the Preparation of Forest Management Schemes and Internal Forest Management Projects (01.09.2009). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.282270 – State Forest Service: “Homepage”. https://amvmt.lrv.lt/ – State Service for Protected Areas: “Homepage”. https://vstt.lrv.lt/en/ – Technical Assistance on the preparation of guidance for the implementation of the new bioenergy sustainability criteria set out in the revised Renewable Energy Directive – https://op.europa.eu/en/publication-detail/-/publication/1fe27161-abb-11eb-927e-01aa75ed71a1/language-en – EU. 2021. Final report on the implementation of the new bioenergy sustainability criteria set out in the revised Renewable Energy Directive (REDIIIBIO – final report). Brussels, Belgium.
<p><i>Risk rating</i></p>	<p>Low risk Specified risk</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

1.1.2	Legal ownership of land and resource use rights shall be respected.
<i>Findings</i>	<p>Scale of assessment</p> <p>Woody feedstock in Lithuania is sourced from both publicly and privately owned forests.</p> <p>Analysis</p> <p>In Lithuania, the forest property registration process is strictly regulated by different laws and regulations, notably, the Law on Land and the Law on Forests. Tenure rights can be registered in the land registry only if a natural person or a legal entity of any form provides relevant documents confirming the legal rights to the land concerned. This would include identification documents (notably, passport, national ID card or company registration documents), sales-purchase agreements, court decisions or other documents proving the legal right to own the real property. All properties including land are registered under the Real Property Register and Cadastre of the State Register Centre. The Geoportal of Lithuania also provides spatial data including maps of forest land properties.</p> <p>The main primary feedstock suppliers in Lithuania providing raw materials for biomass production are the State Forest Enterprise and private forest owners. The State Forest Enterprise is entrusted to perform forestry activities in state forests by the Decision of the Government in which the map of state forests with exact boundaries is provided. The forests managed by the State Forest Enterprise are certified according to FSC Forest Management and Chain of Custody standards under which the indicators concerning tenure, ownership and management rights and responsibilities are evaluated. Concerning the State Forest Enterprise, no report on the violation of forest ownership and legal use rights or any disputes over these rights in state forests has been identified.</p> <p>The process of forest restitution and the establishment of legal rights including the provisions for solving disputes is clearly defined by legislation. The forest land restitution process is ongoing and the stakeholders consulted for this RRA did not flag any conflicts during the process. The land under restitution is supposed to go under private ownership when the process ends. Private forest owners must follow the registration process defined by legislation and be registered under the Real Property Register and Cadastre of the State Register Centre. Every private forest owner must have a forest estate plan and registration document. There are no reports in recent years that land rights have been issued in violation of the prevailing regulations or that corruption has been involved in the process of issuing land tenure and management rights.</p> <p>Enforcement and monitoring</p> <p>The National Land Service under the Ministry of Environment and the State Register Centre enforces laws and regulations related to land registry and the Environmental Protection Department enforces the Law on Forests. Regular monitoring of the enforcement is conducted and reported by the concerned agencies. Information about the Register and Cadastre including cadastral data and maps, ownership and its history, and property restrictions are publicly accessible online.</p> <p>Risk classification and justification</p> <p>The above analysis suggests that legal ownership of land and resource use rights are respected in Lithuania and thus the risk for this indicator is considered “low.”</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>1.1.2 continued <i>Means of verification</i></p>	<ul style="list-style-type: none"> – Documents demonstrating that the Biomass Producer is a legally defined entity – Documents showing legal ownership, lease, history of land tenure and the actual legal use – Long-term unchallenged use – Relevant legislation and level of implementation
<p><i>Evidence reviewed</i></p>	<ul style="list-style-type: none"> – Civil Code of the Republic of Lithuania (18.07.2000). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.245495 – Constitution of the Republic of Lithuania (25.10.1992). https://lrkt.lt/en/about-the-court/legal-information/the-constitution/192 – Geoportal of Lithuania: “Home”. https://www.geoportal.lt/geoportal/en/web/en – Law on Forests (22.11.1994). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.6036/asr – Law on Land (19.05.2016). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/4bf34552ad7211e68987e8320e9a5185?jfwid= – National Land Service: “Homepage”. https://www.nzt.lt/go.php/lit/english – State Forest Service: “Homepage”. https://amvmt.lrv.lt/ – State Register Centre: “Property and encumbrances”. https://www.registrucentras.lt/ntr/index_en.php
<p><i>Risk rating</i></p>	<p>Low risk Specified risk</p>
<p>1.1.3</p>	<p>Feedstock shall be legally harvested, supplied and produced, including in compliance with CITES, EUTR and other applicable legal trade requirements.</p>
<p><i>Findings</i></p>	<p>Scale of assessment</p> <p>Woody feedstock harvesting, production and sourcing in Lithuania are regulated by both national and EU-level legislation. The EU Timber Regulation (EUTR) is the main applicable cross-border trade framework for assuring the legality of feedstock in the country.</p> <p>Analysis</p> <p>As discussed in relation to indicator 1.1.1, woody feedstock harvesting, supply and production are fully compliant with the applicable legislation in Lithuania. The Forest Cutting Rules (2010) made pursuant to Article 16 of the Law on Forests set provisions for tree felling in the country. Section 2 of the Rules specifies the minimum harvesting age for different species of tree in various forest groups.</p> <p>In Lithuania, there is detailed and strict legislation covering the process of providing notice before harvesting and issuing logging licences. The implementation of this process is performed by the State Forest Service while the Environmental Protection Department controls the process. In the majority of cases, logging operations are carried out based on the requirements of a forest management plan and the terms included in issued licences. However, there are some specific types of logging where logging licences are not needed and logging can be carried out either after providing written notice to the legal authorities (e.g. in the case of sanitary logging, selective logging of soft deciduous trees like aspen, grey alder, willow and sallow, and commercial thinning) or without written notice (property boundary logging, pre-commercial thinning, and selective sanitary logging). While no estimate is available, the total volume of wood produced through these types of logging is thought to be small.</p> <p>The Forest Cutting Rules – as stated above – describe the types of forest harvesting and define the minimum age of forest trees to be cut which depends on the tree species and the forest categories. Additionally, timber harvesting in private forests is regulated by the Regulations on Private Forest Management and Use, which describe how the cutting rate must be managed according to cutting age, permissible width of cutting area, and forest stand conditions.</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

1.1.3 continued

Findings continued

In Lithuania, there are no forest harvesting-specific fees such as royalties, stumpage fees or other volume-based fees. However, according to the Law on Forests, in the case of state forests, up to 15% of the income from sold raw wood and standing forests is allocated to be transferred to the state budget. Based on the annual report from the Customs of the Republic of Lithuania, the wood industry is not mentioned as one of the risky business sectors related to the avoidance of paying custom taxes or inaccurate or false product classification. In general, the Customs of the Republic of Lithuania enforce strict customs control at different levels, including sample checks of product classification, product value and country of origin. Furthermore, Lithuania is following EU regulations on different product classifications. More information about timber traffic in customs can be found in the Integrated Tariff of the Republic of Lithuania database (LITAR) Annual Report from the Customs of the Republic of Lithuania.

The Environmental Protection Department periodically checks how forest operations in cutting areas are being or have been implemented in compliance with existing legal acts. The Department also has an annual control plan where the aspects and places to be checked are listed. Even though the legal authorities have increased control of illegal logging in Lithuania, some illegal logging still occurs. However, according to statistical data provided by the State Forest Service, illegally logged wood in Lithuania amounts only to 0.1% of the total felled timber volume and has been following a declining trend in recent years. Moreover, the forest governance portal of Chatham House, UK – which monitors illegal logging globally – does not record any illegal logging activities in Lithuania (Chatham House 2023). This suggests that the incidence and the risks of illegal logging in the country are low.

CITES came into force in Lithuania on 9 March 2002. The trade rules (regulating importing and exporting of endangered wild animals, parts thereof or articles made from them) are prepared following the requirements of the CITES Convention. The procedures and provisions of the European Commission Regulation on the protection of species of wild fauna and flora by regulating trade thereof are to be followed. The licences, certificates and other documents as specified in these regulations are required when bringing in (or taking out) animals and plants, parts thereof or articles made from them. An individual licence issued by the Ministry of Environment must be presented for each consignment of animals and plants, parts thereof or articles made from them. On bringing in animals and plants, parts thereof and products made from them into (or out of) Lithuania to third countries, the completion of customs formalities is allowed only upon presenting the required licences.

No CITES tree species are growing in Lithuania.

Enforcement and monitoring

The State Service for Protected Areas is responsible for the implementation of CITES requirements. The Environmental Protection Department is the Competent Authority in Lithuania for monitoring the implementation of the EUTR. It collaborates with the Customs Department under the Ministry of Finances to share data and information concerning timber imports from third parties in customs. Feedback from the EU (2021) and the stakeholder consultation does not point to any shortcomings in the enforcement and monitoring of the Law on Forests or Forest Cutting Rules. Moreover, as discussed in the analysis illegally logged wood in Lithuania amounts to only 0.1% of the total felled timber volume and has been following a declining trend in recent years. The forest governance portal of Chatham House, UK does not record any illegal logging activities in the country.

The above points to there being effective enforcement and monitoring of the relevant legislation and regulations.

Risk conclusions and justifications

Based on the above analysis, it can be concluded that feedstock in Lithuania is legally harvested, supplied and produced in compliance with CITES, EUTR and other applicable legal trade requirements. Therefore, the risk for this indicator is assessed as low.

Means of verification

- Relevant national and EU legislation
- Level of enforcement

Annex 1 Detailed findings for Supply Base Evaluation continued

1.1.3 continued

Means of verification

- Reference to sources of information in guidance notes
- List of species purchased
- Assessment of risk that CITES species may be mixed with non-CITES species, in the supply chain
- Interviews demonstrate that the CITES requirements are understood
- CITES species are known and identified
- Where relevant, the permits for harvest and trade in any CITES species
- Annexes of the Washington Convention (1973)
- Webpages of responsible government agencies

Evidence reviewed

- Chatham House. (2023). Forest Governance and Legality. Forest Governance and Legality | Chatham House
- Commission Implementing Regulation (EU) No 927/2012 of 9 October 2012 amending Annex I to Council Regulation (EEC) No 2658/87 on the tariff and statistical nomenclature and the Common Customs Tariff
- Customs of the Republic of Lithuania: <https://lrmuitine.lt/web/guest/643>
- Forest Cutting Rules (27.01.2010). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.364764>
- Law concerning the ratification of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES; 22.05.2001). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.136145>
- Law on Environmental Protection (14.05.2015). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/6378f2b0023211e6bf4ee4a6d3cdb874>
- Law on Forests (22.11.1994). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.6036/asr>
- Law on Protected Areas (11.06.2015). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/cf9f9132b60d11e6a3e9de0fc8d85cd8?jfwid>
- Law on Wild Flora (15.06.1999). <https://e-seimas.lrs.lt/portal/legalActEditions/lt/TAD/TAIS.83678>
- Order of the Minister of Environment of the Republic of Lithuania, Director of the Customs Department under the Ministry of Finance and Director of the State Food and Veterinary Service “On Approval of the Rules for Trade in Wildlife” (07.12.2021). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/afc20aa2575c11ec86bdcb0a6d573b32?jfwid=>
- Regulations on the Management and Use of Private Forests (24.07.1997). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.41952>
- Rules for the Preparation of Forest Management Schemes and Internal Forest Management Projects (01.09.2009). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.282270>
- State Service for Protected Areas: “Homepage”. <https://vstt.lrv.lt/en/>
- Maps about registered private forest management plans and cutting permissions issued in private forests: <https://projektai.amvmt.lt/pvp.aspx> (projects) <https://kirtleidimai.amvmt.lt/> (cutting permissions) and <https://kadastras.amvmt.lt/portal/apps/webappviewer/index.html?id=42967a7ae33848a6ad8a577a70307607> (maps).
- EU. 2021. Final report on the implementation of the new bioenergy sustainability criteria set out in the revised Renewable Energy Directive (REDIIIBIO – final report). Brussels, Belgium.

Risk rating

Low risk Specified risk

Annex 1 Detailed findings for Supply Base Evaluation continued

1.1.4	<p>Payments for harvest rights and feedstock, including duties, relevant royalties and taxes related to timber harvesting shall, be complete and up to date.</p>
<i>Findings</i>	<p>Scale of assessment Corporate Income Tax, Value Added Tax (VAT) and Personal Income Tax are the key applicable taxes to timber and feedstock harvesting in Lithuania.</p> <p>Analysis Value Added Tax (VAT) in Lithuania is paid by all persons (natural and legal) having an annual turnover from their business activities over EUR 30,000. Since 2010, VAT for timber is paid by the purchaser and not by the seller to avoid VAT laundering. That significant change in the VAT law acts as a good preventative measure in stopping illegal activities related to paying VAT. Therefore, the risk related to VAT is considered low. If timber is sold by a natural person to a legal entity, the natural person is liable to pay income tax which is 15% of the amount received. In such a case, income tax is paid by the company purchasing the wood. If wood is sold by an individual entrepreneur involved in the timber sales business, income tax is paid by that person once a year through the income declaration process. Income tax declaration is co-ordinated by the State Tax Inspectorate. Declaration of income and payment of income tax allows the possibility to claim back part of the income tax declared, therefore there is an economic incentive to make declarations. Information about taxpayers can be checked online in the register of taxpayers. In addition, on the website of the State Tax Inspectorate, there is a record of those legal entities that do not pay their taxes due on time. The State Forest Enterprise is considered as low risk by the State Tax Inspectorate. It can be mentioned here that there are no forest harvesting-specific fees such as royalties, stumpage fees and other volume-based fees in Lithuania.</p> <p>Enforcement and monitoring The State Tax Inspectorate is responsible for the collection, control and monitoring of VAT and other taxes which must be declared every month by the taxpayers.</p> <p>Risk conclusions and justifications Based on the above analysis, the risk for this indicator is assessed as low.</p>
<i>Means of verification</i>	<ul style="list-style-type: none"> – Records of payments and correspondence with revenue authorities show payments are correct – Inquiry to Lithuanian Tax Inspectorate
<i>Evidence reviewed</i>	<ul style="list-style-type: none"> – Law on Corporate Income Tax (20.12.2001). https://e-seimas.lrs.lt/portal/legalActEditions/lt/TAD/TAIS.157066 – Law on Value-Added Tax (05.03.2002). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.163423 – Procedures for calculating and paying obligatory payments to the state budget for the income received from round wood and standing timber sales in state forests (Decision of the Government, 10.08.2002). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.176230/zLujMFJEot – Rules for selling standing timber in state forests (Decision of the Government, 31.10.2001). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.153151/asr – State Tax Inspectorate database of taxpayers in Lithuania: https://www.vmi.lt/evmi/en/home – VAT Calc: “Lithuania VAT guide 2023”. https://www.vatcalc.com/lithuania/lithuania-vat-guide/
<i>Risk rating</i>	<p>Low risk Specified risk</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

1.1.5	<p>There shall be adequate protection of the Supply Base from unauthorised and illegal activities, such as illegal logging, mining, and encroachment.</p>
Findings	<p>Scale of assessment</p> <p>Woody feedstock harvesting, production and sourcing from forests in Lithuania are regulated by applicable national legislation.</p> <p>Analysis</p> <p>Forest harvesting in Lithuania is regulated by the Law on Forests and subsequent regulations made under the Law.</p> <p>The Environmental Protection Department has an annual control plan which lists the aspects and places to be checked. Even though the legal authorities have increased control of illegal logging in Lithuania, some illegal logging still occurs. However, according to statistical data provided by the State Forest Service, illegally logged wood in Lithuania amounts to only 0.1% of the total felled timber volume coming from both private and state forests and in recent years has been following a declining trend. Moreover, the forest governance portal of Chatham House does not record any illegal logging activities in Lithuania (Chatham House 2023). There is no report of other illegal activities, notably, mining or encroachment in the forests. This suggests that the incidence and the risks of illegal activities in both state and private forests in the country are low.</p> <p>In compliance with the EU Timber Regulation, the State Forest Enterprise has strengthened its due diligence systems for the production of legal timber. Statistical information, as well as maps of registered private forest management plans and cutting permissions issued in private forests, can be obtained online from https://projektai.amvmt.lt/pvp.aspx (projects) https://kirtleidimai.amvmt.lt/ (cutting permissions) and https://kadastras.amvmt.lt/portal/apps/webappviewer/index.html?id=42967a7ae33848a6ad8a577a70307607 (maps).</p> <p>Overall, the risk of corruption among forestry officials is substantially minimised through the implementation of controls over the issued harvesting permits and completed forestry works. Lithuania's current standing on the Transparency International Corruption Perception Index is good: it is ranked the 34th least corrupt out of 180 countries with a score of 62 out of 100 in 2022; the score and ranking have improved steadily since 2012.</p> <p>Enforcement and monitoring</p> <p>The Environmental Protection Department enforces the relevant legislation and regularly monitors and controls all matters related to illegality. The State Forest Enterprise established several groups of inspectors comprising representatives from different control institutions (the State Forest Enterprise, the regional department of the Environmental Protection Department, and the police) and they periodically monitor unauthorised activities in the forest.</p> <p>As discussed in the analysis illegally logged wood in Lithuania amounts to only 0.1% of the total felled timber volume and has been following a declining trend in recent years. The forest governance portal of Chatham House, UK does not record any illegal logging activities in the country.</p> <p>The above points to an effective enforcement and monitoring of the relevant legislation and regulations.</p> <p>Risk conclusions and justifications</p> <p>Based on the above analysis, the risk for this indicator is assessed as low.</p>
Means of verification	<ul style="list-style-type: none"> – Overall evaluation of data from overseeing institutions – Assessment of potential impacts at an operational level and of measures to minimise impacts – Regional Best Management Practice manuals – Monitoring results – Relevant legislation

Annex 1 Detailed findings for Supply Base Evaluation continued

1.1.5 continued

Evidence reviewed

- Chatham House. (2023). Forest Governance and Legality. Forest Governance and Legality | Chatham House
- Commission Implementing Regulation (EU) No 927/2012 of 9 October 2012 amending Annex I to Council Regulation (EEC) No 2658/87 on the tariff and statistical nomenclature and on the Common Customs Tariff
- Customs of the Republic of Lithuania: https://www.lrmuitine.lt/mport/failai/e_prekyba/privatiems_asmenims/21_4_30_DUK_GB_EN.pdf
- Forest Cutting Rules (27.01.2010). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.364764>
- Law on Forests (22.11.1994). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.6036/asr>
- Law on Protected Areas (11.06.2015). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/cf9f9132b60d11e6a3e9de0fc8d85cd8?jfwid>
- Regulations on the Management and Use of Private Forests (24.07.1997). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.41952>
- Rules for the Preparation of Forest Management Schemes and Internal Forest Management Projects (01.09.2009). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.282270>
- State Service for Protected Areas: “Homepage”. <https://vstt.lrv.lt/en/>
- Transparency International. (2022). “Corruption Perceptions Index Lithuania”. <https://www.transparency.org/en/cpi/2022/index/ltu>
- Maps about registered private forest management plans and cutting permissions issued in private forests: <https://projektai.amvmt.lt/pvp.aspx> (projects) <https://kirtleidimai.amvmt.lt/> (cutting permissions) and <https://kadastras.amvmt.lt/portal/apps/webappviewer/index.html?id=42967a7ae33848a6ad8a577a70307607> (maps).

Risk rating

Low risk Specified risk

Annex 1 Detailed findings for Supply Base Evaluation continued

Principle 2 – Feedstock sourcing does not harm the environment

Criterion 2.1 – Biodiversity is maintained or enhanced

Element	Description and analysis
2.1.1	<p>Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.</p>
Findings	<p>Scale of assessment The scale of assessment covers key species, habitats, ecosystems and nature conservation areas within legally defined forests in Lithuania.</p> <p>Analysis Lithuanian Forests are well surveyed and all major High Conservation Value areas are identified. According to the Fourth National Report of Lithuania to the Convention on Biological Diversity (CBD) (2009), in recent decades two major inventories were carried out: the woodland key habitat (WKH) inventory (2002-2005) (Andersson et al. 2005) and the survey of Natura 2000 sites and other habitats of EU importance covering both state and private forests. The WKH inventory covered 1.8 million ha (out of total 2.2 million ha) of forests in the country (Andersson et al. 2005). Currently, there is sufficient information concerning HCV forest location, key species, habitats and ecosystems pertaining to biodiversity. Detailed auditing of the country's forests from protection and conservation perspectives was done in 2022 by the National Audit Office of Lithuania. No major knowledge gaps concerning the above exist and data on biodiversity in the country is updated regularly. The following assessment is provided for the categories of HCVs 1-4 that are related to ecosystem and biodiversity.</p> <p><i>HCV Category 1</i> HCV category 1 includes major locations with high concentrations of species listed in the EU Habitat and EU Birds Directive annexes. The current level of information on biodiversity is sufficient to identify most places where large concentrations of protected species are located. At the national level, there are two types of species protection: strictly protected species and protected species. Major sites of strictly protected species are known and stored in the database of protected species. The registration system for protected habitats, species and ecosystems has been operational since the end of 2013. In Lithuania, all timber – be it from state or private forests – is sold together with a copy of the felling permit. The location of the cutting activity is written in the permit and it is possible to check that the timber does not originate from sites with protected species' habitats. Checking online that the timber does not originate from the nesting site of protected birds can be done in two ways: requesting information using the online system from the authorities (free of charge, http://amas1.am.lt/sbgarris/) or registering and using digital maps or Forest Cadaster, which includes information about known nesting sites (fees apply, see also https://projektai.amvmt.lt/pvp.aspx (projects) https://kirtleidimai.amvmt.lt/ (cutting permissions) and https://kadastras.amvmt.lt/portal/apps/webappviewer/index.html?id=42967a7ae33848a6ad8a577a70307607 (maps)). Considering the facts above, there is no risk that all key species, habitats, ecosystems, and HCVs on biodiversity under this category are not comprehensively identified.</p> <p><i>HCV Category 2</i> HCV category 2 includes high conservation value large woodland territories: UNESCO world heritage sites, Ramsar sites, forests in strict nature reserves, biosphere reserves, and reserves of national or regional parks.</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

2.1.1 continued Findings continued

Historical land use and forestry practices have resulted in the majority of present-day forests in Lithuania being semi-natural ecosystems with small insertions of close-to-natural forest stands. No landscape-scale natural forests with viable populations of the most naturally occurring species exist in the country. Surveys show that in previous centuries all Lithuanian forest was under various management regimes varying from extensive to very intensive forestry with land-use change.

The first forestry practices to be suspended were those in wetland forest stands situated around large bogs due to the establishment of strict nature reserves of large wetlands. In the 1970s, forestry practices were suspended in other valuable forests on account of the creation of nature reserves. Four areas of UNESCO world heritage are established in Lithuania. The sites are owned by the state and no active forestry practices take place on these sites.

Five Ramsar convention areas are designated in Lithuania. Four of them are under strict protection, and one is managed under a nature management plan. Other important areas for the biodiversity landscape include valuable forests in national parks, regional parks and biosphere reserves. All of them are managed under nature management plans or not managed at all.

Currently, there is no evidence that the remaining important large-scale forests are negatively impacted by forestry practices. Most important landscape-level ecosystems are designated as strict nature reserves or biosphere reserves at the national level and are owned exclusively by the state.

The risk for this category is considered low due to the existing strong network of nature-protected territories.

HCV Category 3

HCV category 3 includes Natura 2000 sites, habitats of EU Importance and woodland key habitats.

In Lithuania, there is currently no virgin forest. The remaining old-growth forest belongs to the state and is under strict protection including as strict reserves or strict reserve zones in regional parks.

Natural forest habitats and valuable ecosystems are surveyed, identified and protected under the EU Habitats Directive (Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora) and designated as Natura 2000 sites. Not all Natura 2000 sites overlap with nationally protected areas so not all are protected at both the national and EU levels. Close-to-natural forest parcels with high biodiversity are identified as WKH⁷. Aggregations of WKH are designated as biosphere polygons at the national level or as Natura 2000 sites at the EU level. However, large areas of WKH remain outside protected areas.

Old-growth forests in Lithuania belong to the state and are under strict protection. No cases of timber logging in such territories were registered during the last decade. According to the current regulation, forest areas belonging to Natura 2000 sites should be managed by both forest management and /or nature management plans. Presently, not all Natura 2000 sites have nature management plans, which means that the majority are managed only by forest management plans.

Moreover, according to the consultation with the Environmental Coalition, Natura 2000 sites located in private forests can be harvested although there is currently a temporary restriction in place on harvesting Natura 2000 sites located in state forests. However, subsidies are paid to private forest owners for implementing the management restrictions in Natura 2000 sites; therefore the level of protection of sites is defined as adequate. The majority of WKHs – as the consultation with the experts suggests – have a certain level of protection by falling inside Natura 2000 sites or as voluntarily protected sites by forest managers or owners. Based on the above discussion, the risk class for HCV 3 can be considered low.

HCV Category 4

HCV Category 4 includes ecosystem protection forests and protection forests i.e. forest areas important for securing basic environmental functions.

⁷ In WKH inventory (Andersson et al. 2005), WKH are defined as an intact forest area with a high probability of the non-accidental occurrence of an endangered, vulnerable, rare or care demanding Habitat Specialist species.

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>2.1.1 continued <i>Findings continued</i></p>	<p>Lithuania belongs to the boreal forest zone and the forest provides key ecosystem services. To ensure the quality of such services all forest is divided into four groups under the Law on Forests. Two such groups are directly related to ecosystem services: group II (ecosystem protection and recreational) accounts for 251,600 ha (11.4%) and group III (protective) for 273,900 ha (12.4%) (Ministry of Environment and State Forest Service 2023).</p> <p>Special regulations for forest management apply to such forests: mainly by raising the cutting age and limiting felling techniques to protect critical ecosystem services such as soil, air, water and man's living environment.</p> <p>Forest groups are defined by government decisions. Implementation of the Law on Forests is provided through forest management plans which are obligatory for most forest holdings. All management plans need to be approved by the competent authorities. Forest groups are designated by territorial planning documents known as forest management schemes. Allocating forests to the groups is in accordance with the official guides for forest attribution to the groups. Forest groups can be changed only by the decision of the Ministry of Environment under two clearly defined circumstances – a change in the forest management scheme for the region or a change of boundaries of protected areas.</p> <p>The above discussion suggests that a low risk is associated with this category.</p> <p>Enforcement and monitoring</p> <p>The Environmental Protection Department enforces the Law on Forests and its subsequent regulations while the State Service for Protected Areas covers the Law on Protected Areas.</p> <p>The Department of Cultural Heritage is responsible for the supervision of compliance with restrictions on cultural areas and objects of the cultural and historical heritage associated with trees and forests.</p> <p>Regular monitoring of the enforcement is conducted and reported by the concerned agencies.</p> <p>Risk conclusion and justification</p> <p>As the risk classes for all HCV Categories are assessed as low, the risk class for this indicator is also assessed as low.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> – Spatial Information Portal (www.geoportal.lt) – Maps – Interviews – Regional, publicly available data from a credible third party – Relevant legislation and their level of implementation
<p><i>Evidence reviewed</i></p>	<ul style="list-style-type: none"> – Cultural Heritage Spatial Electronic Service Information System “KPEPIS”: https://www.kpepis.lt/site-tree/ – European Commission: “The Birds Directive”. https://ec.europa.eu/environment/nature/legislation/birdsdirective/index_en.htm – European Commission: “The Habitats Directive”. https://ec.europa.eu/environment/nature/legislation/habitatsdirective/index_en.htm – Forest Cutting Rules (27.01.2010). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.364764 – Law on Forests (22.11.1994). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.6036/asr – Law on Protected Areas (11.06.2015). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/cf9f9132b60d11e6a3e9de0fc8d85cd8?jfwid – Lithuanian Information Portal: https://www.geoportal.lt/geoportal/

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>2.1.1 continued <i>Evidence reviewed</i></p>	<ul style="list-style-type: none"> – Ministry of Culture: “Council for Digitisation of Lithuanian Cultural Heritage”. https://lrkm.lrv.lt/en/structure-and-contacts/councils-and-commissions/councils-under-the-ministry/council-for-digitisation-of-lithuanian-cultural-heritage – Ministry of Environment and State Forest Service. (2023). Lithuanian Statistical Yearbook of Forestry 2021. – National Audit Office of Lithuania. (2022). Protection of Lithuanian Forestry Resources. https://www.valstybeskontrole.lt/EN/Product/24091/protection-of-lithuanian-forestry-resources – Regulations on the Management and Use of Private Forests (24.07.1997). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.41952 – Rules for the Preparation of Forest Management Schemes and Internal Forest Management Projects (01.09.2009). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.282270 – State Service for Protected Areas: “Homepage”. https://vstt.lrv.lt/en/ – Naturalit: “Homepage”. https://naturalit.lt/en/home/ – Natura 2000 teritorijų apsaugos tikslai – Apsaugos tikslai – Lizmap (biomon.lt) (only accessible in Lithuania) – Fourth National Report of Lithuania CBD (2009). CBD Fourth National Report – Lithuania (English version) – Andersson, Leif; Kriukelis, Rimvydas. & Skuja, Saulis. 2005. Woodland Key Habitat Inventory in Lithuania. Kaunas: Lithuanian Forest Inventory and Management Institute. & Linköping: Forestry Board of Östra Götaland. WKH-report-Lithuania-full-version.pdf (pro-natura.net)
<p><i>Risk rating</i></p>	<p>Low risk Specified risk</p>
<p>2.1.2</p>	<p>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.</p>
<p><i>Findings</i></p>	<p>Scale of assessment The scale of assessment covers the threats to and impacts on the identified key species, habitats, ecosystems, and areas of high conservation value pertaining to biodiversity in legally defined forests in Lithuania.</p> <p>Analysis The management of established protected areas is regulated by the Law on Protected Areas.</p> <p>The main legal documents which regulate the protection and management regime of protected areas are the Law on Protected Areas; regulations for individual protected areas; the planning documents of individual protected areas; the individual regulation of protected objects or selective areas; contracts on protection. The management of Lithuanian forests according to the Law on Forests is based on the forest management plan; this includes a special section on nature protection measures where the protected species, habitats and other environmental protection values or objects are listed and marked on maps and prescribed and detailed protection measures are set out in the plan. Forest management plans for private forests must include a special section related to forest protection and the implementation of the requirements for environmental protection.</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

2.1.2 continued Findings continued

The Law on Forests states that for management purposes the Lithuanian forest is divided into four groups (forest reserves, special-purpose forest, protective forest, and commercial forest). Whether forest harvesting is allowed depends on the management and protection regime assigned which is based on the applicable forest group. Special regulations for forest management are raising the cutting age and limiting the permissible felling techniques to safeguard critical ecosystem services such as fuelwood, non-wood forest products, recreation, fresh air, water, nutrient cycling and biodiversity conservation. There are strict rules on forest management in each of these groups, for example, in group IIA clear felling is forbidden, and only mature trees can be felled using selective cuttings; in group III clear felling is restricted to five hectares and an additional age limit is set for some tree species.

The forest operations must be planned and implemented in compliance with the requirements set out in the regulations on forest cuttings. There are provisions in the regulations for seasonal harvesting operations according to the forest groups (for instance, in some forests of groups II and III the final cuttings are not allowed from 15 March until 1 August). There are requirements for the protection of nesting places of rare and endangered bird species as well as detailed requirements to leave trees and deadwood for biodiversity protection in logging sites.

According to the current regulations, forest areas belonging to Natura 2000 sites should be managed by both forest management and/or nature management plans. Currently, not all Natura 2000 sites have nature management plans, therefore a majority are managed only in accordance with forest management plans. However, compensation is paid to forest owners for implementing management restrictions on Natura 2000 sites in private forests. Considering the above, the level of protection of sites is defined as adequate.

Natural forest habitats and valuable ecosystems in Lithuania are surveyed, identified and protected under the Habitats Directive (Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora) and designated as Natura 2000 sites. Semi-natural forest parcels with high biodiversity are identified as WKH. Aggregations of WKH were designated as biosphere polygons at the national level or as Natura 2000 sites at the EU level. Based on different sources of information, reports and various databases as well as statistical data sources, it is evident that most WKHs have a certain level of protection through their Natura 2000 status or voluntary protection by forest managers or owners.

Historical places under the supervision of the Cultural Heritage Department, urban forests and parks are managed by municipalities. There are no major problems with forests related to cultural values. A working database of immovable cultural values exists and all values are preserved by the implementation of the Law on Protection of Immovable Cultural Properties which can be considered sufficient. Historical places are preserved using the precautionary approach e.g. by creating buffer zones around important areas or by carrying out mandatory exploratory research. No cases of destruction of immovable cultural values due to forest management are recorded for state and private forests in Lithuania. The State Forest Enterprise has developed its procedures for the identification, monitoring and protection of HCV forests. Lithuanian forests are well surveyed, and all major High Conservation Value areas are identified. According to the Fourth National Report of Lithuania CBD (2009) in recent decades, two major inventories were carried out: the woodland key habitat (WKH) inventory (2002 -2005) (Andersson et al. 2005) and the survey of Natura 2000 sites and other habitats of EU importance in both state and private forests. The WKH inventory covered 1.8 million ha (out of a total 2.2 million ha) of forests in the country (Andersson et al. 2005).

Currently, there is sufficient information concerning HCV forest location, key species, habitats and ecosystems pertaining to biodiversity as well as threats to and impacts on them. Detailed auditing of the country's forests from protection and conservation perspectives was undertaken in 2022 by the National Audit Office of Lithuania. No major knowledge gaps concerning the above exist and data about biodiversity in the country is updated regularly.

Enforcement and monitoring

The State Forest Enterprise and Environmental Protection Department constantly check how forest operations are being performed in state forests, and whether they follow environmental requirements stated in the planning documents and logging permissions.

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>2.1.2 continued <i>Findings continued</i></p>	<p>The Environmental Protection Department periodically controls how the application of legal acts focused on the protection of natural values, objects and protected areas is implemented. In addition, the regional offices of the Environmental Protection Department periodically control how the management and application of legal requirements for environmental protection are implemented in the management units.</p> <p>The Department of Cultural Heritage is responsible for the supervision of compliance with restrictions on cultural areas and objects of cultural and historical heritage associated with trees and forests. Regular monitoring of enforcement is conducted and reported by the concerned agencies.</p> <p>It should be noted here that the National Audit Office of Lithuania (2022) indicated deficits in the monitoring regime for forests and protected areas in the country. Therefore, monitoring issues should be considered carefully during the certification and audit process.</p> <p>Risk conclusion and justification</p> <p>Based on the above analysis, the threats to and impacts on the identified key species, habitats, ecosystems, and areas of HCV pertaining to biodiversity or heritage values in the Lithuanian forests are identified and evaluated. Therefore, the risk class for this indicator is assessed as low.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> – Guidance provided by biomass producers to suppliers/forest operators, regarding threats to the identified forests and areas of high conservation value – Regional Best Management Practices – Standard Operating Procedures – Codes of Practice – Records of biomass producers' field inspections – Monitoring records – Relevant maps https://kadastras.amvmt.lt/portal/apps/webappviewer/index.html?id=42967a7ae33848a6ad8a577a70307607
<p><i>Evidence reviewed</i></p>	<ul style="list-style-type: none"> – Cultural Heritage Spatial Electronic Service Information System “KPEPIS”: https://www.kpepis.lt/site-tree/ – Forest Cutting Rules (27.01.2010). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.364764 – Law on Forests (22.11.1994). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.6036/asr – Law on Protected Areas (11.06.2015). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/cf9f9132b60d11e6a3e9de0fc8d85cd8?jfwid – Law on the Protection of Immovable Cultural Properties (11.07.2019). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/30b3a4e0e38011ea869e86e74cfea363?jfwid=bkaxlfhf – Lithuanian Information Portal: https://www.geoportal.lt/geoportal/ – Ministry of Culture: “Council for Digitisation of Lithuanian Cultural Heritage”. https://lrkm.lrv.lt/en/structure-and-contacts/councils-and-commissions/councils-under-the-ministry/council-for-digitisation-of-lithuanian-cultural-heritage – National Audit Office of Lithuania. (2022). Protection of Lithuanian Forestry Resources. Vilnius. https://www.valstybeskontrole.lt/EN/Product/24091/protection-of-lithuanian-forestry-resources – Regulations on the Management and Use of Private Forests (24.07.1997). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.41952 – Rules for the Preparation of Forest Management Schemes and Internal Forest Management Projects (01.09.2009). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.282270

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>2.1.2 continued <i>Evidence reviewed</i></p>	<ul style="list-style-type: none"> – State Service for Protected Areas: “Homepage”. https://vstt.lrv.lt/en/ – Naturalit: “About Natura 2000”. https://naturalit.lt/apie-natura-2000/ – Natura 2000 teritorijų apsaugos tikslai – Apsaugos tikslai – Lizmap (biomon.lt) – Relevant map – Fourth National Report of Lithuania CBD (2009). CBD Fourth National Report – Lithuania (English version) – Andersson, Leif; Kriukelis, Rimvydas. & Skuja, Saulis. 2005. Woodland Key Habitat Inventory in Lithuania. Kaunas: Lithuanian Forest Inventory and Management Institute. & Linköping: Forestry Board of Östra Götaland. WKH-report-Lithuania-full-version.pdf (pro-natura.net)
<p><i>Risk rating</i></p>	<p>Low risk Specified risk</p>
<p>2.1.3</p>	<p>Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.</p>
<p><i>Findings</i></p>	<p>Scale of assessment The scale of assessment covers the key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in legally defined forests in Lithuania.</p> <p>Analysis The Law on Forests states that for management purposes Lithuanian forest is divided into four groups (forest reserves, special-purpose forest, protective forest, and commercial forest).</p> <p>Forest cuttings are allowed depending on the management and protection regime which is based on the forest category. The management of established protected areas is regulated by the Law on Protected Areas. The management of the Lithuanian forest – according to the Law on Forests – is based on a forest management plan; this includes a special section on nature protection measures where the protected species, habitats and other environmental protection values or objects are listed and marked on maps and prescribed and detailed protection measures are set out in the plan.</p> <p>The statistical information on Lithuanian protected areas and rare and endangered species found in Lithuanian forests and other relevant data can be found on the website of the State Service for Protected Territories (SSPT).</p> <p>The regulations on the preparation of forest management schemes and the forest management plan state that a forest management plan for a state forest must include sections related to forest protection against fires, sanitary protection, biodiversity protection, and recreational and social functions of the forest. The forest management plan for private forests must have a special section related to forest protection and the implementation of requirements for environmental protection. The forest operations must be planned and implemented following the requirements set out in the regulations on forest cuttings. The management plans and cuttings falling within the Protected Territories should be agreed upon with SSPT.</p> <p>There are provisions in the regulations for seasonal harvesting operations according to the forest groups (for instance, in some forests of groups II and III, final cuttings are not allowed from 15 March until 1 August). There are requirements for the protection of nesting places of rare and endangered bird species as well as detailed requirements to leave trees and deadwood for biodiversity protection in logging sites. The maintenance of buffer zones along watercourses or open areas as well as some limitations related to protection against soil erosion is also foreseen in the regulations on forest cuttings.</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

2.1.3 continued Findings continued

Forest management plans are prepared for ten-year periods and include analyses, monitoring results and the description of the impact of management of the previous period. During the preparation process for a new management plan all relevant data must be collected and together with analyses of the previous management cycle this must be fed into the new management plan and consequently into operational practice. The requirements for forestry machinery are defined in the regulations on the evaluation of compliance of tractors, trailers and other machines in agriculture and forestry.

According to the current regulation, forest areas belonging to Natura 2000 sites should be managed by both forest management and (or) nature management plans. Currently, not all Natura 2000 sites have nature management plans which means that the majority are managed in accordance with forest management plans. Moreover, according to the consultation with the Environmental Coalition, Natura 2000 sites located in private forests can be harvested although there is a temporary restriction put in place on harvesting Natura 2000 sites located in state forests. However, subsidies are paid to private forest owners for implementing the management restrictions in Natura 2000 sites and therefore the level of protection of these sites is defined as adequate.

While it is evident that the majority of WKH have a certain level of protection through their Natura 2000 status or their voluntary protection by forest managers, there is still a significant area of WKHs without any legal protection at all. This is particularly true for private forests. The protection of WKH (which are outside protected areas) in a private forest is not covered by any legislation and is based on a voluntary approach by private forest owners.

On top of the above, according to National Audit Office of Lithuania (2022), the protection of rare, endangered or vulnerable habitats, plants and animals in all forests is not ensured in the country.

Enforcement and monitoring

The State Forest Enterprise constantly checks how forest operations are being performed in state forests and whether they follow the environmental requirements stated in the planning documents and logging permissions. The Environmental Protection Department and SSPT periodically check how the application of legal acts focused on the protection of natural values, objects and protected areas are implemented.

In addition, the regional offices of the Environmental Protection Department periodically check how the management and application of legal requirements for environmental protection are implemented in the management units.

The Department of Cultural Heritage is responsible for the supervision of compliance with restrictions on cultural areas and objects of the cultural and historical heritage associated with trees and forests.

Regular monitoring of the enforcement is conducted and reported by the concerned agencies. However, it should be noted here that National Audit Office of Lithuania (2022) indicated deficits in the monitoring regime for forests and protected areas in the country.

Therefore, monitoring issues should be considered carefully during the certification and audit process.

Risk conclusion and justification

Based on the above analysis, some habitats of EU importance, particularly those located in private forests, (notably, Natura 2000 sites and WKHs) are not protected and thus their maintenance and enhancement are at risk.

Therefore, the risk class for this indicator is assessed as specified.

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>2.1.3 continued <i>Means of verification</i></p>	<ul style="list-style-type: none"> – Regional Best Management Practices – Assessment of potential impacts at the operational level and of measures to minimise impacts – Monitoring results – Publicly available information on the protection of the values identified – Level of enforcement – Regional, publicly available data from a credible third party – Spatial Information Portal (www.geoportal.lt) maps
<p><i>Evidence reviewed</i></p>	<ul style="list-style-type: none"> – Cultural Heritage Spatial Electronic Service Information System “KPEPIS”: https://www.kpepis.lt/site-tree/ – Forest Cutting Rules (27.01.2010). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.364764 – Law on Forests (22.11.1994). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.6036/asr – Law on Protected Areas (11.06.2015). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/cf9f9132b60d11e6a3e9de0fc8d85cd8?jfwid – Law on the Protection of Immovable Cultural Properties (11.07.2019). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/30b3a4e0e38011ea869e86e74cfea363?jfwid=bkaxlfhf – Lithuanian Information Portal: https://www.geoportal.lt/geoportal/ – Ministry of Culture: “Council for Digitisation of Lithuanian Cultural Heritage”. https://lrkm.lrv.lt/en/structure-and-contacts/councils-and-commissions/councils-under-the-ministry/council-for-digitisation-of-lithuanian-cultural-heritage – National Audit Office of Lithuania. (2022). Protection of Lithuanian Forestry Resources. https://www.valstybeskontrole.lt/EN/Product/24091/protection-of-lithuanian-forestry-resources – Regulations on the Management and Use of Private Forests (24.07.1997). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.41952 – Rules for the Preparation of Forest Management Schemes and Internal Forest Management Projects (01.09.2009). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.282270 – State Service for Protected Areas: “Homepage”. https://vstt.lrv.lt/en/ – Naturalit: “About Natura 2000”. https://naturalit.lt/apie-natura-2000/ – Natura 2000 teritorijų apsaugos tikslai – Apsaugos tikslai – Lizmap (biomon.lt)
<p><i>Risk rating</i></p>	<p>Low risk Specified risk</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

Criterion 2.2 – Ecosystem productivity, functions, and services are maintained or enhanced

Element	Description and analysis
2.2.1	<p>Feedstock shall not be sourced from land that had one of the following statuses in January 2008 and no longer has that status due to land conversion: a. Forests b. Wetlands c. Peatlands d. Highly biodiverse grasslands.</p>
Findings	<p>Sale of assessment</p> <p>The scale of assessment covers legally defined forest land in Lithuania.</p> <p>Analysis</p> <p>According to the Lithuanian Law on Forests, a forest is defined as a ‘tract of land not less than 0.1 ha, covered by trees or other forest vegetation or temporary loss of it (cleared or burned areas)’.</p> <p>According to regulations on reforestation and planting, the plantation is defined as a ‘special purpose of one tree or bush species plantation grown for commercial timber and energetic resources’. According to the Law on Land, forest land includes forested areas (forest stands), non-forested areas (clear-cutting areas, damaged forest stands, open forest areas, forest nurseries, forest seed orchards, and plantations), areas comprising forest roads, forest compartments, technological and fire prevention borders, area of forest yards, recreational yards, game feeding sports and land assigned for afforestation as well as fragments of other land use purpose inside the forest.</p> <p>The conversion of forest land into other categories is strictly regulated by national legislation and is allowed only in clearly defined and exceptional cases. The main legal acts dealing with the conversion of forest land into other categories are as follows: The Law on Land, The Law on Territorial Planning, The Law on Forests, The Regulation Procedures of the Conversion of Forest Land into Other Categories, and Compensation for the Conversion of Forest Land into Other Categories. The conversion of forest land into other categories is prohibited in forest reserves, forests for the protection of ecosystems, forest for the Baltic Sea and Curonian Lagoon protection (1 km), and protected forests, forests of protective zones in state parks.</p> <p>The conversion of forest land into other categories according to national legislation is allowed only in nine exceptional cases, related to objects of state importance, communication infrastructure, objects of public importance, mineral resources, military objects, waste storage facilities, and restoration of former countryside objects. In addition, the national legislation states that in cases of conversion of forest land into other categories (only in the mentioned exceptional cases), an equal amount of land must be afforested and be assigned to forest land. The person who initiates the conversion (according to exceptional cases prescribed by the law) must pay compensation to the state budget equal to the market price of forest land under conversion and cover any expenses necessary to plant the same area of forest and maintain it until it reaches the status of forest land, as well as covering the lost timber growth. The compensation for the conversion of forest in group III is double the normal amount and in group II triple.</p> <p>According to the Global Peatland Initiative (2023), about two thirds of Lithuania’s peatland was damaged due to drainage in the twentieth century. However, there is no report of any notable conversion of forests, wetlands, peatlands and highly biodiverse grasslands – under state or private ownership – into plantations since 2008 in Lithuania. This conversion issue was also not flagged during the consultation with any stakeholders. Forest inventory data in Lithuania is available from 1969 and the forest statistics including forest land-use change, forest coverage, forest conversion and other related information are available publicly on the website of the State Forest Service.</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>2.2.1 continued <i>Findings continued</i></p>	<p>Enforcement and monitoring</p> <p>The Environmental Protection Department enforces the Law on Forests and its subsequent regulations while the State Service for Protected Areas covers the Law on Protected Areas, and State Land Services covers the laws and regulations related to land.</p> <p>The Department of Cultural Heritage is responsible for the supervision of compliance with restrictions on cultural areas and objects of the cultural and historical heritage associated with trees and forests.</p> <p>Regular monitoring of the enforcement is conducted and reported by the concerned agencies. EU (2021) and stakeholder consultation do not point to any shortcomings in the enforcement and monitoring of the Law on Forests and other Laws and Regulations mentioned above.</p> <p>The above indicates effective enforcement and monitoring of the relevant legislation and regulations.</p> <p>Risk conclusion and justification</p> <p>As suggested by the analysis above, the risk class for this indicator is assessed as low.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> – Historical maps and consultation with stakeholders – Regional, publicly available data from a credible third party – Relevant legislation and their level of implementation
<p><i>Evidence reviewed</i></p>	<ul style="list-style-type: none"> – Geoportal of Lithuania: “Home”. https://www.geoportal.lt/geoportal/en/web/en – Law on Forests (22.11.1994). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.6036/asr – Law on Land (19.05.2016). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/4bf34552ad7211e68987e8320e9a5185?jfwid= – Law on Territorial Planning (27.09.2016). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/dde75b13095011e78dadb175b73de379?jfwid – National Land Service: “Homepage”. https://www.nzt.lt/go.php/lt/english – Regulations on Defining the Main Land Use Purpose and Procedures for Application, Evaluation and Decision-Making in Order to Change the Main Land Use Purpose (Decision of the Government, 13.10.2004). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.242993 – State Forest Service: “Homepage”. https://amvmt.lrv.lt/ – State Register Center: “Property and encumbrances”. https://www.registrucentras.lt/ntr/index_en.php – Global Peatland Initiative. 2023. Getting to know the Lithuanian wetlands: A day in Degučiai for World Wetlands Day 2023 Global Peatlands Initiative – EU. 2021. Final report on the implementation of the new bioenergy sustainability criteria set out in the revised Renewable Energy Directive (REDIIBIO – final report). Brussels, Belgium
<p><i>Risk rating</i></p>	<p>Low risk Specified risk</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

2.2.2	Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.
<i>Findings</i>	<p>Scale of assessment The scale of assessment covers ecosystem health, vitality, functions and services in legally defined forests in Lithuania.</p> <p>Analysis The Law on Forests and the Law on Protected Areas and their related regulations make provision for the maintenance and enhancement of ecosystems, their health, vitality, functions and services in Lithuanian forests.</p> <p>As analysed in indicator 2.1.3, while it is evident that the majority of habitats of EU importance have a certain level of protection through their Natura 2000 status or voluntary protection by forest managers. However, a significant area of WKHs still have no legal protection at all. This is particularly true for private forests. The protection of WKHs (which are outside protected areas) in a private forest is not covered by any legislation and relies on a voluntary approach by private forest owners. On top of this, according to the National Audit Office of Lithuania (2022), the protection of rare, endangered or vulnerable habitats, plants and animals in all forests is not ensured.</p> <p>Enforcement and monitoring The Environmental Protection Department enforces the Law on Forests and its subsequent regulations while the State Service for Protected Areas covers the Law on Protected Areas.</p> <p>The Department of Cultural Heritage is responsible for the supervision of compliance with restrictions on cultural areas and objects of the cultural and historical heritage associated with trees and forests.</p> <p>Regular monitoring of the enforcement is conducted and reported by the concerned agencies.</p> <p>Risk conclusion and justification Based on the above analysis, ecosystems, their health, vitality, functions and services in the Lithuanian forests are at risk of being neither maintained nor enhanced.</p> <p>Therefore, the risk class for this indicator is assessed as specified.</p>
<i>Means of verification</i>	<ul style="list-style-type: none"> – Guidance provided by biomass producers to suppliers/forest operators, regarding threats to the identified forests and areas of high conservation values – Spatial Information Portal (www.geoportal.lt) maps – Regional Best Management Practices – Monitoring records – Relevant legislation and their level of implementation
<i>Evidence reviewed</i>	<ul style="list-style-type: none"> – Cultural Heritage Spatial Electronic Service Information System “KPEPIS”: https://www.kpepis.lt/site-tree/ – Forest Cutting Rules (27.01.2010). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.364764

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>2.2.2 continued <i>Evidence reviewed continued</i></p>	<ul style="list-style-type: none"> – Law on Protected Areas (11.06.2015). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/cf9f9132b60d11e6a3e9de0fc8d85cd8?jfwid – Lithuanian Information Portal: https://www.geoportal.lt/geoportal/ – National Land Service: “Homepage”. https://www.nzt.lt/go.php/lit/english – Regulations on the Management and Use of Private Forests (24.07.1997). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.41952 – Rules for the Preparation of Forest Management Schemes and Internal Forest Management Projects (01.09.2009). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.282270 – State Service for Protected Areas: “Homepage”. https://vstt.lrv.lt/en/ – Naturalit: “About Natura 2000”. https://naturalit.lt/apie-natura-2000/ – Natura 2000 teritorijų apsaugos tikslai – Apsaugos tikslai – Lizmap (biomon.lt)
<p><i>Risk rating</i></p>	<p>Low risk Specified risk</p>
<p>2.2.3</p>	<p>Soil quality in the Supply Base shall be maintained or enhanced.</p>
<p><i>Findings</i></p>	<p>Scale of assessment The Supply Base covers the legally defined forests in Lithuania.</p> <p>Analysis The Law on Forests has provisions for maintaining and enhancing soil quality in forests in Lithuania. Article 9 of the Law specifies that forest management must be done in such a way as to maintain soil productivity and Article 17 specifies that all kinds of damage to the forest soil should be avoided.</p> <p>The Law on Forests states that for management purposes Lithuanian forest is divided into four groups (forest reserves, special-purpose forests, protective forests, and exploitative forests). Forest cuttings are allowed depending on the assigned management and protection regime which is based on the forest group.</p> <p>Special forest management regulations apply to forests to protect critical ecosystem services through raising the cutting age and limiting the choice of felling techniques. The forest operations must be planned and implemented according to the requirements set out in the Forest Cutting Rules. There are provisions in the above-mentioned regulations for seasonal harvesting operations according to the forest groups (e.g. in some forests of groups II and III the final cuttings are not allowed from 15 March until 1 August) for the protection of soil. As discussed in indicator 2.1.3, the maintenance of buffer zones along watercourses or open areas as well as some limitation in relation to the protection of soil against erosion is foreseen in the regulations on forest cuttings.</p> <p>In the Forest Cutting Rules the technological requirements for the system of skidding roads and places to store biomass are clearly defined. For instance, it is not allowed to burn biomass in forests or to extract biomass from forest site types with poor soil layers or from forests of group II. The regulation on reforestation and planting sets the requirements for soil preparation before planting according to the existing soil type.</p> <p>The management of Lithuanian forests is undertaken in accordance with the Law on Forests and is based on a forest management plan. The plan includes a special section on nature protection measures where the protected species, habitats and other environmental protection values (including the soil) or objects are listed and marked on maps and prescribed protection measures are set out.</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>2.2.3 continued <i>Findings continued</i></p>	<p>The forest management plan for private forest owners must have a special section related to forest protection and the implementation of requirements for environmental protection. In addition, the forest management plan, the planning documents of the individual protected area, and the individual regulation of protected objects or selective areas define the requirements and procedures to prevent soil damage. For example, in certain areas cutting activities are only allowed when the soil surface is frozen.</p> <p>Cutting activities in protected areas must be agreed upon with the relevant authorities (State or Regional Park Administrations, State Services for Protected Areas). Before cutting the preliminary environmental impact assessment (impacts on soil) is carried out by foresters in the state forest and preventative measures are identified. The prevailing practice is to include in the agreements with contractors the requirement to inform the forest owners – be it the state or private citizen – about observed potential negative impacts of forest operations on biodiversity and ecosystems and to take preventative measures to avoid or minimise them. It should be noted here that harvesting is usually done during winter. However, as the winters are getting milder in Lithuania as in many other parts of the world, harvesting machines disturb the soil more.</p> <p>Enforcement and monitoring</p> <p>The Environmental Protection Department enforces the Law on Forests and all subsequent regulations under it. It periodically controls how forest operations in cutting areas are being or have been implemented according to existing legal acts. The State Forest Service has an annual control plan where the aspects and places to be checked are listed.</p> <p>Risk conclusion and justification</p> <p>Based on the above analysis, the magnitude of environmental issues, soil in particular, is considered of limited scale. Therefore, this indicator is given a low-risk class.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> – Regional Best Management Practices – Records of biomass producer’s field inspections – Assessment at an operational level of measures designed to minimise impacts on the values identified – Monitoring records – Publicly available information on the protection of soil – Relevant legislation and their level of implementation
<p><i>Evidence reviewed</i></p>	<ul style="list-style-type: none"> – Forest Cutting Rules (27.01.2010). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.364764 – Law on Forests (22.11.1994). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.6036/asr – Law on Protected Areas (11.06.2015). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/cf9f9132b60d11e6a3e9de0fc8d85cd8?jfwid – Regulations on the Management and Use of Private Forests (24.07.1997). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.41952 – Rules for the Preparation of Forest Management Schemes and Internal Forest Management Projects (01.09.2009). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.282270 – State Forest Service: “Homepage”. https://amvmt.lrv.lt/ – State Service for Protected Areas: “Homepage”. https://vstt.lrv.lt/en/

Annex 1 Detailed findings for Supply Base Evaluation continued

<i>Risk rating</i>	Low risk Specified risk
2.2.4	Where the removal of harvest forest residues and / or stumps occurs, this shall not lead to irreversible negative impacts to the ecosystem.
<i>Findings</i>	<p>Scale of assessment The scale of assessment covers the removal of harvest residues and stumps from legally defined forests in Lithuania.</p> <p>Analysis All forest operations including harvesting and post-harvesting clean-up are planned and implemented in accordance with the relevant regulations set up under the Law on Forests. The forest operations must be planned and implemented according to the requirements set out in the Forest Cutting Rules. In this regulation, the technological requirements for the extraction of biomass to protect ecosystems are clearly defined. The requirements concern the time and the season for extraction according to the forest site, the use of skidding roads, places to store biomass as well as banning the burning of biomass in forests and extracting it from certain forest site types (with poor soil layer) or forests of group II. Stump removal is not a common practice in Lithuania. According to Varnagirytė-Kabašinskienė et al. (2019) about 0.25 million m³ of forest residues are commercially extracted each year in Lithuania and no negative ecological impacts are reported.</p> <p>Enforcement and monitoring The Environmental Protection Department enforces the Law on Forests and all subsequent regulations under it. It periodically checks how forest operations in cutting areas are being or have been implemented according to existing legal acts. The Environmental Protection Department has an annual control plan where the aspects and places to be checked are listed. The EU report (2021) and stakeholder consultation do not point to any shortcomings in the enforcement and monitoring of the Law on Forests concerning the harvesting and post harvesting clean-up.</p> <p>Risk conclusion and justification Based on the above discussion, it can be concluded that the removal of harvest residues and stumps does not lead to irreversible negative impacts to the ecosystem in Lithuania. Thus, this indicator is given a low-risk class.</p>
<i>Means of verification</i>	<ul style="list-style-type: none"> – Regional Best Management Practices – Relevant legislation and their level of implementation – Assessment at an operational level of measures designed to minimise impacts on the identified values – Monitoring records
<i>Evidence reviewed</i>	<ul style="list-style-type: none"> – Forest Cutting Rules (27.01.2010). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.364764 – Law on Forests (22.11.1994). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.6036/asr – Law on Protected Areas (11.06.2015). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/cf9f9132b60d11e6a3e9de0fc8d85cd8?jfwid – Regulations on the Management and Use of Private Forests (24.07.1997). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.41952 – Rules for the Preparation of Forest Management Schemes and Internal Forest Management Projects (01.09.2009). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.282270

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>2.2.4 continued <i>Evidence reviewed continued</i></p>	<ul style="list-style-type: none"> – State Forest Service: “Homepage”. https://amvmt.lrv.lt/ – State Service for Protected Areas: “Homepage”. https://vstt.lrv.lt/en/ – Varnagirytė-Kabašinskienė, I., Lukminė, D., Mizaras, S., Beniušienė, L. and Armolaitis, L. 2019. Lithuanian forest biomass resources: legal, economic and ecological aspects of their use and potential. <i>Energy, Sustainability and Society</i> (2019) 9:41 – EU. 2021. Final report on the implementation of the new bioenergy sustainability criteria set out in the revised Renewable Energy Directive (REDIIIBIO – final report). Brussels, Belgium
<p><i>Risk rating</i></p>	<p>Low risk Specified risk</p>
<p>2.2.5</p>	<p>Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.</p>
<p><i>Findings</i></p>	<p>Scale of assessment The scale of assessment covers the quality and quantity of ground water, surface water and water downstream connected to legally defined forests in Lithuania.</p> <p>Analysis The Law on Protected Areas, the Law on Water and the Law on Forests contain the requirements for the protection of water resources including surface watercourses in forests. One of the main functions of the forests – as defined in the legislation – is water protection.</p> <p>The Law on Water regulates the protection and monitoring of water resources (including watercourses in a forest) in Lithuania. The Law on Forests states that for management purposes Lithuanian forest is divided into four groups (forest reserves, special-purpose forest, protective forest, and exploitative forest). A special management regime is set out in the forest management plans or management documents of protected areas where such forests are located so as to protect water bodies from damage and pollution. Forest cuttings are allowed depending on the management and protection regime of the particular forest group. Special forest management regulations apply to regimes such as raising the cutting age and limiting felling techniques to provide critical ecosystem services. The maintenance of buffer zones along watercourses or open areas is foreseen in the regulations on forest cuttings.</p> <p>Forest cuttings targeted to maintain biodiversity and to regulate special areas around watercourses are defined in the Forest Cutting Rules. Regulations on the evaluation of compliance of tractors, trailers and other machines in agriculture and forestry set out the requirements for forest machinery for it to be technically sound and to prevent possible damage to the environment, including watercourses. In addition, the Forest Cutting Rules define the requirements for the preparation of forest cuttings and the use of skidding roads to protect soil and water streams.</p> <p>The preliminary assessment of the cutting area is made by State Forest Service officials, contractors and private forest owners to evaluate the cutting area and discuss and agree on the use of forest-cutting techniques taking into account the special conditions of the cutting area, protection of water streams and distribution of skidding roads.</p> <p>The use of chemicals is very strictly regulated in state forests. This amount is calculated based on necessary conditions for forest protection against disease and other natural calamities and is focused on reducing the permissible amount. Following this decree, the State Forest Enterprise has its annual plan for the use of chemicals and the plan for the reduction in use of chemicals. The use of chemicals in private forests is not very common but private forest owners are required to follow the general legislation related to plant protection products.</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>2.2.5 continued <i>Findings continued</i></p>	<p>The National Audit Office of Lithuania (2022) does not point to any adverse impacts on the quality or quantity of ground water, surface water and water downstream connected to forests or forestry operations. This issue was also not flagged during the consultation with the stakeholders in the country. The Assessment of Lithuania’s progress in the Programmes of Measures during the second planning cycle of the Water Framework Directive (European Commission 2021) did not report any pressures or chemical substances from forestry operations in any of the country’s four river basin districts.</p> <p>Enforcement and monitoring</p> <p>The Environmental Protection Department enforces the Law on Forests and all subsequent regulations under it. It periodically checks how forest operations in cutting areas are being or have been implemented according to existing legal acts. The Environmental Protection Department has an annual control plan where the aspects and places to be checked are listed.</p> <p>The Environmental Protection Agency enforces the Law on Water and the State Service for Protected Areas enforces the Law on Protected Areas. The European Commission’s report (EU 2021) and stakeholder consultation do not point to any shortcomings in the enforcement and monitoring of the Law on Forests or other Laws and Regulations mentioned above. Moreover, National Audit Office of Lithuania (2022) does not point to any adverse impacts on quality and quantity of ground water, surface water or water downstream connected to forests or forestry operations.</p> <p>The above points to effective enforcement and monitoring of the relevant legislation and regulations.</p> <p>Risk conclusion and justification</p> <p>Based on the above discussion, it can be concluded that the quality and quantity of groundwater, surface water and water downstream in forest areas are maintained or enhanced in Lithuania. Thus, this indicator is given a low-risk class.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> – Regional Best Management Practices – Assessment at an operational level of measures designed to minimize impacts on the identified values – Monitoring records – Inquiry from Environmental Inspectorate – Publicly available information on the protection of soil – Relevant legislation and the level of implementation
<p><i>Evidence reviewed</i></p>	<ul style="list-style-type: none"> – Environmental Protection Agency: “Map of Environmental Protection Agency activities”. https://www.gamta.lt/apie-agentura/aplinkos-apsaugos-agenturos-veiklu-zemelapis/153 – Forest Cutting Rules (27.01.2010). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.364764 – Law on Environmental Protection (14.05.2015). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/6378f2b0023211e6bf4ee4a6d3cdb874 – Law on Forests (22.11.1994). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.6036/asr – Law on Protected Areas (11.06.2015). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/cf9f9132b60d11e6a3e9de0fc8d85cd8?jfwid – Law on Water (05.07.2000). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.123809?jfwid=92zt7rbw2 – Regulations on the Management and Use of Private Forests (24.07.1997). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.41952

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>2.2.5 continued <i>Evidence reviewed continued</i></p>	<ul style="list-style-type: none"> – Rules for the Preparation of Forest Management Schemes and Internal Forest Management Projects (01.09.2009). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.282270 – State Forest Service: “Homepage”. https://amvmt.lrv.lt/ – State Service for Protected Areas: “Homepage”. https://vstt.lrv.lt/en/ – National Audit Office of Lithuania. (2022). Protection of Lithuanian Forestry Resources. https://www.valstybeskontrole.lt/EN/Product/24091/protection-of-lithuanian-forestry-resources – European Commission (2021). The Assessment of Lithuania’s progress in Programmes of Measures during the second planning cycle of the Water Framework Directive. Assessment of Member States’ progress in Programmes of Measures during the second planning cycle of the Water Framework Directive – Publications Office of the EU (europa.eu) – EU. 2021. Final report on the implementation of the new bioenergy sustainability criteria set out in the revised Renewable Energy Directive (REDIIIBIO – final report). Brussels, Belgium
<p><i>Risk rating</i></p>	<p>Low risk Specified risk</p>
<p>2.2.6</p>	<p>Air emissions shall comply with national legislation or in the absence of national legislation with industry best practice.</p>
<p><i>Findings</i></p>	<p>Scale of assessment The scale of assessment covers the air emissions from forestry activities in legally defined forests in Lithuania.</p> <p>Analysis The Law on Ambient Air Pollution regulates the protection, management and monitoring of ambient air pollution. There is no indication of any damage to or influence on air quality from forest operations. The cutting technique and its use does not cause an impact on air quality. Usually, forestry operations are in remote places and do not affect the air quality. The monitoring and statistical data on air quality and its tendency can be found on the website of the Environmental Protection Agency.</p> <p>In the Forest Cutting Rules, the technological requirements are clearly defined and prevent the burning of biomass in the forest. The requirements for forestry machinery are defined in the regulations on the evaluation of compliance of tractors, trailers and other machines in agriculture and forestry. These regulations also set out the standard for forest machinery so that it does not damage the environment including through air pollution.</p> <p>Enforcement and monitoring The Environmental Protection Agency is the institution responsible for ambient air monitoring. The monitoring procedures, functions and data can be found on the website of the Environmental Protection Agency. The Environmental Protection Department periodically checks how forest operations in cutting areas are being or have been implemented according to the existing legal acts.</p> <p>Risk conclusion and justification Based on the above discussion, it can be concluded that air emissions from forestry activities in legally defined forests are insignificant in Lithuania. Therefore, the level of risk for this indicator is considered low.</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>2.2.6 continued <i>Means of verification</i></p>	<ul style="list-style-type: none"> – Regional Best Management Practices – Records of biomass producer’s field inspections – Assessment at an operational level of measures designed to minimise impacts on the identified values – Monitoring records – Interviews with staff – Relevant legislation and the level of implementation
<p><i>Evidence reviewed</i></p>	<ul style="list-style-type: none"> – Environmental Protection Agency: “Map of Environmental Protection Agency activities”. https://www.gamta.lt/apie-agentura/aplinkos-apsaugos-agenturos-veiklu-zemelapis/153 – Environmental Protection Agency: “Statistics and data on air quality”. https://aaa.lrv.lt/veiklos-sritys/oras/oro-kokybes-statistika-ir-duomenys – Environmental Protection Agency: Current air quality. http://193.219.53.11/ap3/ – Forest Cutting Rules (27.01.2010). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.364764 – Law on Ambient Air Protection (12.01.2009). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.356483?jfwid= – Law on Environmental Protection (14.05.2015). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/6378f2b0023211e6bf4ee4a6d3cdb874 – Law on Forests (22.11.1994). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.6036/asr – Law on Protected Areas (11.06.2015). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/cf9f9132b60d11e6a3e9de0fc8d85cd8?jfwid – Law on Water (05.07.2000). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.123809?jfwid=92zt7rbw2 – Order concerning the approval of agricultural and forestry vehicles (Order of Minister of Agriculture, 14.10.2015). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/0c36cf3072af11e59a1ed226d1cbceb5?jfwid=19p2z99b15 – Regulations on the Management and Use of Private Forests (24.07.1997). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.41952 – Rules for the Preparation of Forest Management Schemes and Internal Forest Management Projects (01.09.2009). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.282270 – State Forest Service: “Homepage”. https://amvmt.lrv.lt/ – State Service for Protected Areas: “Homepage”. https://vstt.lrv.lt/en/
<p><i>Risk rating</i></p>	<p>Low risk Specified risk</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

2.2.7 Pesticides shall only be used as part of an Integrated Pest Management (IPM) plan in compliance with national legislation, chemical safety data sheets and industry best practice. Banned pesticides shall not be used.

Findings

Scale of assessment

The scale of assessment covers the application of all pesticides in operations connected to feedstock sourcing from all legally defined forests in Lithuania.

Analysis

The Law on Plant Protection defines the procedures for registration, import, use, storage, protection measures, informing the public, and control of the use of pesticides and other chemicals for plant protection. The Law clearly states that pesticides and other chemicals for plant protection cannot be used in recreational forests. Their use in protected areas and the territories of the Natura 2000 network is regulated by the Government.

All plant protection products must be registered according to the defined procedures of the Plant Protection Products Authorisation Division. Information about registered plant protection products can be found online in the database “Plant protection products”. The list of plant protection products allowed for use in forests can be found on the website of the State Plant Service

(https://www.vatzum.lt/uploads/documents/mik_kyje_20120724.pdf).

According to the defined regulations for the State Forest Enterprise, there are responsible personnel who are involved in the use and storage of chemicals and have relevant qualifications (documents which prove completion of relevant training on the use of chemicals). Moreover, applicable EU laws, most notably the EU REACH Legislation, require the registration of all chemicals and certificates for the person who manages or stores them. Therefore, the same basic rules would apply to private and public forestry in Lithuania.

The use of chemicals – be it a part of integrated pest management (IPM) or otherwise – is very strictly regulated in state forests. The amount used is calculated based on necessary conditions for forest protection against disease and other natural calamities and is focused on reducing the permissible amount. Following this decree, the State Forest Enterprise has an annual plan for the use of chemicals and a plan for the reduction of the use of chemicals.

The use of chemicals in private forests is not very common and private forest owners are required to follow the general legislation related to plant protection products. The European Commission report (2021) did not identify any pressures or chemical substances from forestry operations in any of the country’s four river basin districts. No problem or issue with the use of chemicals in forests in Lithuania was flagged during the consultation with stakeholders.

Enforcement and monitoring

The Environmental Protection Department has an annual control plan where the aspects and places to be checked are listed. The State Plant Service under the Ministry of Agriculture is responsible for the registration, control and enforcement of legislation on plant protection products. In addition, the Environmental Protection Department periodically checks whether forest operations in cutting areas are being or have been implemented according to existing legal acts. The European Commission report (2021) did not identify any pressures or chemical substances from forestry operations in any of the country’s four river basin districts. No problem or issue with the use of chemicals in forests in Lithuania was flagged during the consultation with the stakeholders. This points to there being no shortcomings with the enforcement and monitoring of regulations related to chemical use in forestry in Lithuania.

Risk conclusion and justification

The above analysis suggests that Lithuania has a strong legislative and regulatory framework for the control of the use of pesticides and the use of pesticides is limited in the country’s forests. Therefore, this indicator is assessed as a low-risk class.

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>2.2.7 continued <i>Means of verification</i></p>	<ul style="list-style-type: none"> – Relevant legislation and its level of implementation – Regional Best Management Practices – Assessment at an operational level of measures designed to minimize impacts on the identified values – Monitoring records – Interview with Environmental Inspectorate
<p><i>Evidence reviewed</i></p>	<ul style="list-style-type: none"> – Environmental Protection Agency: “Map of Environmental Protection Agency activities”. https://www.gamta.lt/apie-agentura/aplinkos-apsaugos-agenturos-veiklu-zemelapis/153 – Forest Cutting Rules (27.01.2010). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.364764 – Law on Environmental Protection (14.05.2015). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/6378f2b0023211e6bf4ee4a6d3cdb874 – Law on Forests (22.11.1994). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.6036/asr – Law on Plant Protection (19.10.1995). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.21793/asr – Law on Protected Areas (11.06.2015). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/cf9f9132b60d11e6a3e9de0fc8d85cd8?jfwid – Regulations on the Management and Use of Private Forests (24.07.1997). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.41952 – Rules for the Preparation of Forest Management Schemes and Internal Forest Management Projects (01.09.2009). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.282270 – State Forest Service: “Homepage”. https://amvmt.lrv.lt/ – State Plant Service: “Homepage”. https://www.vatzum.lt/en – State Plant Service: “Plant Protection Products Authorisation Division”. https://www.vatzum.lt/en/activity/fields-of-activity/plant-protection-products-authorisation/ – State Service for Protected Areas: “Homepage”. https://vstt.lrv.lt/en/ – EU REACH Legislation – REACH Legislation – ECHA (europa.eu) – European Commission (2021). The Assessment of Lithuania’s progress in Programmes of Measures during the second planning cycle of the Water Framework Directive. Assessment of Member States’ progress in Programmes of Measures during the second planning cycle of the Water Framework Directive – Publications Office of the EU (europa.eu)
<p><i>Risk rating</i></p>	<p>Low risk Specified risk</p>
<p>2.2.8</p>	<p>Waste shall be disposed of in an environmentally appropriate manner.</p>
<p><i>Findings</i></p>	<p>Scale of assessment The scale of assessment covers the management of all wastes generated by forestry operations connected to feedstock sourcing.</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>2.2.8 continued</p> <p><i>Findings continued</i></p>	<p>Analysis</p> <p>The Law on Waste Management defines waste as “various substances and articles belonging to the category of waste, pursuant to the classifier of waste set forth in paragraph 2 of Article 2 of the Law’.</p> <p>The management, functions of responsible institutions, monitoring, storage and other waste management procedures are defined in that Law. The State Programme on Waste Prevention sets the goals, measures and monitoring procedures for waste reduction and prevention based on analyses.</p> <p>The impact on the environment at the operational level related to waste in the forest is quite low. In the State Forest Enterprise, the prevailing practice is to check the cutting and other areas where forest activities are foreseen before and after work being carried out by responsible persons so as to ensure that no waste is disposed of and that all legal requirements and good practices are followed. In addition, the Environmental Protection Department periodically controls how forest operations in cutting areas are being or have been implemented according to the existing legal acts.</p> <p>There are waste problems in forests close to cities and those with recreational objects which are often visited by the general public. The prevailing practice is that the State Forest Enterprise has agreements with waste management companies for waste collection and transportation from forests and recreational sites. In addition, the Environmental Protection Department periodically checks for waste disposal in forests and in case of a legal violation, it takes appropriate measures. During public awareness campaigns every spring, the State Forest Enterprise organises special events together with municipalities and NGOs to remove waste from forests, including private forests. To address the waste problem in forests close to cities, the methodology for calculating compensation for damage to the environment was updated and the penalties associated with waste disposal in the forest were increased. The compensation amount was substantially increased (more than ten times) and the waste is categorised as hazardous or not hazardous.</p> <p>Enforcement and monitoring</p> <p>The Environmental Protection Department has an annual control plan where the aspects and places to be checked are listed. The Department also enforces and controls regulations relating to the Law on Waste Management. In addition, the Department periodically checks how forest operations in cutting areas are being or have been implemented according to existing legal acts.</p> <p>Risk conclusion and justification</p> <p>The above analysis suggests that Lithuania has a strong legislative and regulatory framework for waste disposal in forests and the related problem is limited to the country’s forests. Therefore, this indicator is assessed as a low-risk class.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> – Regional Best Management Practices – Relevant legislation and their level of implementation – Operational Assessment of potential impacts and of measures to minimise these impacts – Monitoring results
<p><i>Evidence reviewed</i></p>	<ul style="list-style-type: none"> – Environmental Protection Agency: “Map of Environmental Protection Agency activities”. https://www.gamta.lt/apie-agentura/aplinkos-apsaugos-agenturos-veiklu-zemelapis/153 – Forest Cutting Rules (27.01.2010). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.364764 – Law on Environmental Protection (14.05.2015). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/6378f2b0023211e6bf4ee4a6d3cdb874

Annex 1 Detailed findings for Supply Base Evaluation continued

2.2.8 continued

Evidence reviewed continued

- Law on Forests (22.11.1994). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.6036/asr>
- Law on Protected Areas (11.06.2015). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/cf9f9132b60d11e6a3e9de0fc8d85cd8?jfwid>
- Law on Waste Management (23.06.2015). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/ecccf681441b11e68f45bcf65e0a17ee?jfwid=32wf8qgf>
- Regulations on the Management and Use of Private Forests (24.07.1997). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.41952>
- Rules for the Preparation of Forest Management Schemes and Internal Forest Management Projects (01.09.2009). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.282270>
- State Forest Service: “Homepage”. <https://amvmt.lrv.lt/>
- State Program on Waste Prevention (Decree of the Minister of Environment, 22.10.2013). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.458655?jfwid=32wf8x2q>
- State Service for Protected Areas: “Homepage”. <https://vstt.lrv.lt/en/>

Risk rating

Low risk Specified risk

2.2.9

Harvesting levels shall be justified as to how they can be sustained with reference to inventory and growth data for the Supply Base.

Findings

Scale of assessment

The scale of assessment covers forest harvesting in legally defined forests in Lithuania.

Analysis

According to the State Forest Service and National Programme on Development of Forest Sector 2012-2020, the harvesting level is at least 57% on average of the annual allowable cut (AAC) of 10 million m³. Given that AAC is set below the annual increment (around 20 million m³) on forest land and the actual harvesting level remains below AAC, the total growing stock in the country has been increasing in recent decades. This also implies that the current harvesting level in Lithuania does not hamper the long-term production capacity of forests. The average standing stock in Lithuanian forests increased from 222 m³/ha in 2012 to 238 m³/ha in 2022 although in the past five years there has been a slight declining trend (Official Statistical Portal 2023) while the country’s forest area increased by over 3,100 ha per year during 2016-2020 (National Audit Office of Lithuania 2022).

The National Programme on Development of Forest Sector 2012-2020 states that during the last decade, the cutting rate in Lithuanian forests comprised around 5.7–7.4 million m³ of merchantable wood. The amount was in line with the sustainable development principle where the cutting rate does not exceed the annual increment and allows the potential to meet long-term economic, social and environmental needs. The total accumulated stand volume in the Lithuanian forest is over 560 million m³, which means that since 2001 it has increased by over 100 million m³. In addition, the mean increment increased from 16.1 million m³ to 20 million m³. It demonstrates the potential for the biomass market to operate according to sustainability criteria.

Enforcement and monitoring

The Environmental Protection Department enforces the Law on Forests and all subsequent regulations under it. It periodically checks how forest operations in cutting areas are being or have been implemented according to existing legal acts. The State Forest Service has an annual control plan where the aspects and places to be checked are listed.

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>2.2.9 continued</p> <p><i>Findings continued</i></p>	<p>Risk conclusion and justification</p> <p>Based on the above discussion, it can be concluded that harvesting levels can be sustained with reference to inventory and growth in the forests of Lithuania. Thus, this indicator is given a low-risk class.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> – Harvesting records, inventory and growth data and yield calculations, and operational practice indicate that biomass feedstock harvesting rates avoid significant negative impacts on forest productivity and long-term economic viability – Relevant legislation and its level of implementation
<p><i>Evidence reviewed</i></p>	<ul style="list-style-type: none"> – Forest Cutting Rules (27.01.2010). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.364764 – Law on Forests (22.11.1994). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.6036/asr – Law on Protected Areas (11.06.2015). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/cf9f9132b60d11e6a3e9de0fc8d85cd8?jfwid – National Audit Office of Lithuania. (2022). Protection of Lithuanian Forestry Resources. National Audit Office of Lithuania. (2022). Protection of Lithuanian Forestry Resources. Vilnius. https://www.valstybeskontrolė.lt/EN/Product/24091/protection-of-lithuanian-forestry-resources – National Program on Development of Forest Sector 2012-2020 (Decision of the Government, 23.05.2012, No. 569) – Official Statistical Portal. (2023). Forestry and hunting. https://osp.stat.gov.lt/en_GB/miskininkyste-ir-medziokle – Regulations on the Management and Use of Private Forests (24.07.1997). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.41952 – Rules for the Preparation of Forest Management Schemes and Internal Forest Management Projects (01.09.2009). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.282270 – State Forest Service: “Homepage”. https://amvmt.lrv.lt/ – State Service for Protected Areas: “Homepage”. https://vstt.lrv.lt/en/
<p><i>Risk rating</i></p>	<p>Low risk Specified risk</p>
<p>2.2.10</p>	<p>Harvested areas shall be regenerated.</p>
<p><i>Findings</i></p>	<p>Scale of assessment</p> <p>The scale of assessment covers the regeneration of all harvested areas in legally defined forests in Lithuania.</p> <p>Analysis</p> <p>According to Article 15 of the Law on Forests, a manager, owner or user must regenerate an open forest stand after felling or damage (e.g. by fire, disease, wind, floods) from his or her resources. Regeneration can be achieved artificially, naturally or as a combination of both means within three years after clearcutting. In the case of forest plantations, any part of the plantation lost or damaged must be replaced within two years after the damage or loss. The Environmental Protection Department enforces the above rule and imposes a fine for non-compliance.</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>2.2.10 continued <i>Findings continued</i></p>	<p>Enforcement and monitoring</p> <p>The Environmental Protection Department enforces the Law on Forests. Regular monitoring of the enforcement is conducted and reported by the concerned agencies. The EU report (2021) and stakeholder consultation does not point to any shortcomings in the enforcement and monitoring of the Law on Forests. The above indicates effective enforcement and monitoring of the relevant legislation and regulations.</p> <p>Risk conclusion and justification</p> <p>There is appropriate legislation in place in Lithuania to ensure the regeneration of areas harvested for sourcing feedstock for biomass production as the above analysis suggests. The enforcement and monitoring of such legislation are effective. Therefore, it is concluded that the risk rating for this indicator is 'low risk'.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> – Relevant web pages of the State Forest Service – Relevant Lithuanian national and EU acts, laws and regulations
<p><i>Evidence reviewed</i></p>	<ul style="list-style-type: none"> – Forest Cutting Rules (27.01.2010). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.364764 – Law on Forests (22.11.1994). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.6036/asr – Regulations on the Management and Use of Private Forests (24.07.1997). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.41952 – Rules for the Preparation of Forest Management Schemes and Internal Forest Management Projects (01.09.2009). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.282270 – State Forest Service: "Homepage". https://amvmt.lrv.lt/ – State Service for Protected Areas: "Homepage". https://vstt.lrv.lt/en/ – EU. 2021. Final report on the implementation of the new bioenergy sustainability criteria set out in the revised Renewable Energy Directive (REDIIIBIO – final report). Brussels, Belgium
<p><i>Risk rating</i></p>	<p>Low risk Specified risk</p>
<p>2.2.11</p>	<p>The impacts of natural processes such as fires, pests and diseases shall be managed.</p>
<p><i>Findings</i></p>	<p>Scale of assessment</p> <p>The scale of assessment covers the impacts of natural processes in all legally defined forests in Lithuania.</p> <p>Analysis</p> <p>The regulations on forest protection against fire define the general requirements for the establishment of anti-fire lines in forests as well as setting out the procedures for organising fire extinguishing systems in state and private forests. The state programme on forest fire protection establishes and ensures the protection of all forests (state and private) against forest fires.</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

2.2.11 continued *Findings continued*

Lithuanian forests according to the burning class, are divided into three categories (low, medium and high). Forest management of state and private forests is based on forest management plans where the procedures and measures to verify that natural processes, fires, pests and diseases are managed appropriately are defined. The forest management plan, as the main planning document, also covers forest fire management issues which comprise the fire protection line plan, the operational fire extinguishing plan, and maps of forest fire management.

A fire prevention and monitoring system covers all Lithuanian forests. The watch tower network covers the territory of Lithuania with digital cameras and corresponding software allowing detection and identification of forest fires and timely warnings to the responsible institutions. In addition, the State Forest Enterprise has an on-the-ground monitoring system and persons responsible for monitoring and reporting forest fires. The integrated warning system allowing reports about forest fires uses an integrated phone number.

The State Forest Enterprise periodically reports on forest fires, natural calamities, diseases and pests. The statistical information on forest fires can be found on the website of the State Forest Enterprise. Officers of the State Forest Enterprise daily monitor, especially during the fire season, and visit the operational sites to ensure that natural processes, fires, pests and diseases are managed appropriately. In addition, every forest worker and other personnel are instructed on fire prevention and protection measures and receive appropriate training. Machinery working in the forest must be technically sound and have the necessary fire extinguishers.

The regulations on forest sanitation protection define the procedures, responsible institutions and measures for forest protection against pests, diseases and other natural calamities. The monitoring data about forest sanitation conditions and damage have been available since 1968. The State Forest Enterprise reports regularly on the forest condition, natural calamities, disease and pests to the State Forest Service. Statistical data on sanitary conditions of forests, measures for forest sanitation protection, lists of related legal acts, diseases and pests, as well as various scientific reports are available on the website of the State Forest Service. The Service also gives recommendations to all forest owners concerning pests and disease, monitors private forests, and collects and reports data for all forests.

In addition, every forest management plan includes measures for forest protection against pests, disease and natural calamities. Preventative measures to be used by forest owners including state and the private owners are as follows: monitoring and regular check-up and forecast of possible disease and pests, the establishment of the damage layer for disease and pests according to the environmental impact assessment, operational, mechanical and chemical measures, analyses of the effectiveness of preventative measures, biological and chemical products, sanitation cuttings, and trees for insect trap and quarantine. Monitoring is carried out by the responsible persons of the State Forest Service. Every year the State Forest Service monitors, analyses and reports on the situation concerning the concentration of disease and according to the forecast will suggest whether to increase or implement additional measures to protect the forest.

Enforcement and monitoring

The Environmental Protection Department enforces the Law on Forests and all subsequent regulations under it. It periodically checks how forest operations in cutting areas are being or have been implemented according to existing legal acts. The Department also has an annual control plan where the aspects and places to be checked are listed.

Risk conclusion and justification

Based on the above discussion, this indicator is assessed to be low risk.

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>2.2.11 continued <i>Means of verification</i></p>	<ul style="list-style-type: none"> – Regional Best Management Practices – Assessment of potential impacts at the operational level and of measures to minimise impacts – Monitoring results – Relevant legislation and its level of implementation
<p><i>Evidence reviewed</i></p>	<ul style="list-style-type: none"> – Forest Cutting Rules (27.01.2010). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.364764 – General Regulations on Protection Against Fire (27.07.2010). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.379704?jfwid=19p2z99caa – Law on Forests (22.11.1994). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.6036/asr – Regulations of Forests Protection against Fires (Decision of the Government, 07.04.1995). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.17363/asr – Regulations on Forest Sanitation Protection (Decree of the Minister of Environment 11.04.2007). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.295781/asr – Regulations on the Management and Use of Private Forests (24.07.1997). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.41952 – Rules for the Preparation of Forest Management Schemes and Internal Forest Management Projects (01.09.2009). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.282270 – State Forest Service: “Homepage”. https://amvmt.lrv.lt/ – State Service for Protected Areas: “Homepage”. https://vstt.lrv.lt/en/
<p><i>Risk rating</i></p>	<p>Low risk Specified risk</p>
<p>2.2.12</p>	<p>Genetically modified (GM) trees shall not be used.</p>
<p><i>Findings</i></p>	<p>Scale of assessment The scale of assessment covers the use of genetically modified (GM) trees for feedstock.</p> <p>Analysis The main legislation related to the use of GM trees in Lithuania is as follows: the Law on Environment Protection, the Law on Genetically Modified Organisms (GMOs), the Programme on Protection and Development of Lithuanian Forest Genetic Resources, and the Regulation on Reforestation and Planting.</p> <p>The Law on GMOs establishes the sphere of activities involving genetically modified organisms and genetically modified products, their state management and regulation and also the rights, duties and responsibilities of the users of the organisms and products. The law applies to all natural and legal persons who are connected with deliberate release into the environment, use, placing on the market, carrying out tests and research, and other activities involving genetically modified organisms and products.</p> <p>In addition, the Programme on Protection and Development of Lithuanian Forest Genetic Resources, the Regulations on Forest Planting Material as well as the Quality Requirements for Forest Plants, Trees and Bushes Seeds describe measures and instruments for the protection of natural genetic resources and protecting against any possible harmful intervention. The use of seeds and saplings for reforestation and planting is clearly described in the Regulation on Reforestation and Planting which does not include the possibility of using GM trees in the country.</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>2.2.12 continued <i>Findings</i> <i>continued</i></p>	<p>The state authorities responsible for the control of the use of GMOs in Lithuania do not have any information or evidence of unauthorised or commercial use of GM trees in Lithuania.</p> <p>Enforcement and monitoring</p> <p>According to the Law on GMOs, the Ministry of Environment receives notifications from natural and legal persons about genetically modified organisms and genetically modified products. It then gives authorisation for activities involving the use of genetically modified organisms and announces to the public and the institutions authorised by the state. These institutions are the ones which are responsible for market surveillance and state safety examination, information concerning granting, suspending and revocation of authorisation and concerning cases of accidents.</p> <p>Natural and legal persons who wish to engage in activities involving the use of genetically modified organisms must obtain authorisation from the Ministry of the Environment. No application has been submitted or authorisation issued concerning the use of GM trees in Lithuania.</p> <p>The State Forest Service is responsible for the management of the Lithuanian Register of Forest Seeds where information on every registered seed is held regardless of whether the seed is genetically modified or not. No genetically modified seeds are included in the register. The Lithuania forest research institute states that there are no genetically modified seeds of woody plants in the country and there is no capacity to breed or produce genetically modified seeds of woody plants.</p> <p>Risk classification and justification</p> <p>The risk for this indicator can be considered as low according to the above analysis.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> – Reference sources, interviews and records show that GMOs are not used – Public reports – Relevant legislation and their level of implementation
<p><i>Evidence reviewed</i></p>	<ul style="list-style-type: none"> – Environmental Protection Agency: “Map of Environmental Protection Agency activities”. https://www.gamta.lt/apie-agentura/aplinkos-apsaugos-agenturos-veiklu-zemelapis/153 – Forest Cutting Rules (27.01.2010). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.364764 – Law on Environmental Protection (14.05.2015). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/6378f2b0023211e6bf4ee4a6d3cdb874 – Law on Forests (22.11.1994). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.6036/asr – Law on Genetically Modified Organisms (12.06.2001). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.151558?jfwid=32ocqti2u – Law on Protected Areas (11.06.2015). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/cf9f9132b60d11e6a3e9de0fc8d85cd8?jfwid – Law on Waste Management (23.06.2015). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/ecccf681441b11e68f45bcf65e0a17ee?jfwid=32wf8qgf – Regulations on the Management and Use of Private Forests (24.07.1997). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.41952 – Rules for the Preparation of Forest Management Schemes and Internal Forest Management Projects (01.09.2009). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.282270 – State Forest Service: “Homepage”. https://amvmt.lrv.lt/

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>2.2.12 continued <i>Evidence reviewed continued</i></p>	<ul style="list-style-type: none"> – State Program on Waste Prevention (Decree of the Minister of Environment 22.10.2013). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.458655?jfwid=32wf8x2q – State Service for Protected Areas: “Homepage”. https://vstt.lrv.lt/en/
<p><i>Risk rating</i></p>	<p>Low risk Specified risk</p>

Principle 3 – Feedstock is only sourced from supply bases where the forest carbon stock is stable or increasing in the long term

Criterion 3.1 – Feedstock sourcing is consistent with international requirements for land use, land-use change and forestry (LULUCF) emissions

Element	Description and analysis
<p>3.1.1</p>	<p>LULUCF emissions shall be accounted for through one of the following routes:</p> <p>Route A Feedstock may be sourced from a country of origin which is party to the Paris Agreement, and which has submitted a Nationally Determined Contribution to the United Nations Framework Convention on Climate Change (UNFCCC) covering carbon emissions and removals from agriculture, forestry and land use which ensure the changes in carbon stock associated with biomass harvest are counted towards the country’s commitment to reduce or limit greenhouse gas emissions, or</p> <p>Route B Feedstock may be sourced from a country of origin which is party to the Paris Agreement and has national or sub-national laws in place (developed in accordance with Article 5 of the Paris Agreement and applicable in the area of harvest), to conserve and enhance carbon stocks and sinks, and provided there is evidence that reported LULUCF-sector emissions do not exceed removals, or</p> <p>Route C Feedstock may be sourced from a Supply Base where an assessment demonstrates that both the carbon stock is stable, and the forests’ capacity to act as a carbon sink is stable or increasing over the long term.</p>
<p><i>Findings</i></p>	<p>Scale of assessment The assessment covers Lithuania’s compliance with the Paris Agreement and thus Route A.</p> <p>Lithuania ratified the Paris Agreement in 2017 (UNFCCC: “Lithuania”). The country has submitted a Nationally Determined Contribution (NDC) as an EU member state to the UNFCCC covering carbon emissions and removals from land use, land use change, and forestry (LULUCF) ensuring that the changes in carbon stock associated with biomass harvesting are counted towards the country’s commitment to reduce or limit greenhouse gas emissions (European Commission, 2020). Lithuania submitted its eighth national communication and fifth biennial report to UNFCCC in 2022 (Aukštinaitis et al., 2022). For the base year 1990, the historical emissions/removals for the LULUCF sector were -5.5 million tonnes of CO₂ equivalent (Aukštinaitis et al. 2022).</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>3.1.1 continued <i>Findings continued</i></p>	<p>Lithuania's climate policy is based on the requirements of the EU, the UNFCCC, the Kyoto Protocol (KP), and the Paris Agreement. Common policies of the EU play a major role in the implementation of international agreements (Aukštinaitis et al. 2022). The national emission reduction targets are presented in the Lithuanian Climate Change Management Agenda (Seimas of the Republic of Lithuania, 2021) and the National Energy and Climate Plan 2030 (Ministry of Transport and Communications, 2020). For the whole LULUCF sector, Lithuania's target is to keep the removals of the sector higher than the emissions while also reducing the emissions (Seimas of the Republic of Lithuania, 2021).</p> <p>Enforcement and monitoring Lithuania has thus far done all the required reporting and review related to the Paris Agreement. The reporting is subject to multilateral assessment.</p> <p>Risk classification and justification Based on the evidence provided above, the risk for non-conformance with this indicator is classified as 'low'.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> – UNFCCC website and NDC registry – UNFCCC national communications and biennial reports – Relevant national policies, plans and strategies
<p><i>Evidence reviewed</i></p>	<ul style="list-style-type: none"> – Aukštinaitis, T., Čeičytė, L., Kosaitė, M., Liukaitytė-Kukienė, J., Merkelienė, J., Petniūnienė, K., Šaulytė, E., Znutienė, S., Zvicevičius, P., Kairienė, E., Karlonienė, D., Kavšinė, A., Šulinskas, K., Žiukelytė, I., Ozarinskienė, M., Valiukas, D., Politika, L. (2022). Lithuania's eighth national communication and fifth biennial report under the United Nations Framework Convention on Climate Change. Prepared by the Ministry of Environment. – European Commission. (2020). Update of the NDC of the European Union and its Member States. https://unfccc.int/sites/default/files/NDC/2022-06/EU_NDC_Submission_December%202020_0.pdf – Ministry of Transport and Communications. (2020). National Energy and Climate Plan 2021-2030. – Seimas of the Republic of Lithuania. (2021). Resolution: Approving the National Climate Change Management Agenda. – UNFCCC: "Lithuania". https://unfccc.int/node/61103
<p><i>Risk rating</i></p>	<p>Low risk Specified risk</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

Criterion 3.2 – Carbon stocks in the forest area of the Supply Base are stable or increasing in the long term

Element	Description and analysis
3.2.1	<p>All feedstock sourcing shall be consistent with either of these two options:</p> <p>Option A Feedstock may be sourced from Supply Bases where an assessment of the Supply Base shows that the forest carbon stocks are stable or increasing, or</p> <p>Option B Feedstock may be sourced, if the assessment shows that the forest carbon stocks are declining in the Supply Base, provided that the decline is due to natural processes (fire, pests etc.), and sourcing of feedstock has the aim to recover feedstock that would otherwise be lost or to assist regeneration.</p>
<i>Findings</i>	<p>Scale of assessment</p> <p>The Lithuanian National Forest Inventory (NFI) hosted by the State Forest Service includes an as-sessment of forest carbon stocks and sinks. The Lithuanian national GHG emissions reporting made under the UNFCCC and the Kyoto Protocol includes the reporting of current and projected GHG re-movals and emissions. Option A is applied.</p> <p>Analysis</p> <p>Lithuanian forest area has been almost constant over the past 20 years with a slight increase; the fast growth of the 20th century has slowed down (Ministry of Environment & State Forest Service, 2023). In 2021, the total forest growing stock in Lithuania was 567 million m³ (Ministry of Environment & State Forest Service, 2023). There was a steep increase in estimated forest growing stock in the early 2000s due to a change in forest inventory methodology. Most of the Lithuanian forests are available for commercial use. The gross annual growth was 20 million m³ in 2021 and 6.7 million m³ of merchantable wood was harvested in 2020 (the latest number available in the Yearbook of Forestry 2021) (Ministry of Environment & State Forest Service, 2023).</p> <p>According to the procedures approved by the Ministry of Environment on a national system of ac-counting of emission units of greenhouse gases (GHG) related to the land use, land use change and forestry (LULUCF) sector, the State Forest Service is responsible for carrying out the accounting of GHG emissions and removals in the LULUCF sector; this includes reporting on forest management, afforestation and deforestation activities according to Articles 3.3 and 3.4 of the Kyoto Protocol (Aukštinaitis et al. 2022). The Environmental Protection Agency (EPA) under the Ministry of Environ-ment prepares the annual report on GHG emissions and removals making use of the guidelines ap-proved by the IPCC (IPCC, 2006) (Aukštinaitis et al. 2022).</p> <p>The results of the GHG inventory indicate that the LULUCF sector has been a net CO₂ sink over the last three decades and is projected to remain so both in WEM (with existing measures) and WAM (with additional measures) scenarios. However, the sector’s carbon sink is projected to decline because of the decreasing GHG removals on forest land; this is due to the ageing forest stands and thus a decrease in annual growing stock volume increment (Aukštinaitis et al. 2022). Felling volumes are also projected to increase with the total volume of removals accounting for 72%–75% of the total annual increment in stand volume by 2040 (Aukštinaitis et al. 2022). Afforestation and reforestation activities are projected to continue according to the national plans (Aukštinaitis et al. 2022; Seimas of the Republic of Lithuania, 2012).</p> <p>Lithuanian forestry is generally sustainable and controlled by legislation. The Law on Forests provides the main legislative framework for forestry in the country (Law on Forests, 1994). The preparation of a forest management plan (officially called a Forest Management Project) is mandatory (Law on Forests, 1994). All forest management activities must be carried out in accordance with the management plan.</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>3.2.1 continued <i>Findings continued</i></p>	<p>The Regulations on the Management and Use of Private Forests (1997) regulate the management of private forests. Permission from the State Forest Service is needed for harvesting trees. The annual cutting limit for state forests is approved by the Government for five-year periods annually and allocated by the Ministry of Environment for state forest managers.</p> <p>Enforcement and monitoring</p> <p>The Environmental Protection Department enforces and monitors the Law on Forests and the related regulations. Forests are monitored regularly in the NFI. GHG monitoring and future projections are presented in the reporting related to the Paris Agreement.</p> <p>Risk classification and justification</p> <p>Based on the evidence provided above, there are indications that harvest pressures towards Lithuanian forests may grow in the future. However, measures are taken to tackle the pressures and thus, the risk for non-conformance with this indicator is classified as 'low'.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> – Applicable legislation – National forest inventory data – Statistical reports – Public reports and plans
<p><i>Evidence reviewed</i></p>	<ul style="list-style-type: none"> – Aukštinaitis, T., Čeičytė, L., Kosaitė, M., Liukaitytė-Kukienė, J., Merkelienė, J., Petniūnienė, K., Šaulytė, E., Znutienė, S., Zvicevičius, P., Kairienė, E., Karlionienė, D., Kavšinė, A., Šulinskas, K., Žiukelytė, I., Ozarinskienė, M., Valiukas, D., Politika, L. (2022). Lithuania's eighth national communication and fifth biennial report under the United Nations Framework Convention on Climate Change. Prepared by the Ministry of Environment. – IPCC. (2006). 2006 IPCC Guidelines for National Greenhouse Gas Inventories. https://www.ipcc-nggip.iges.or.jp/public/2006gl/ – Law on Forests (22.11.1994). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.6036/asr – Ministry of Environment and State Forest Service. (2023). Lithuanian Statistical Yearbook of Forestry 2021. – Regulations on the Management and Use of Private Forests (24.07.1997). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.41952 – Seimas of the Republic of Lithuania. (2012). Resolution: Approving the National Forestry Sector Development Programme for 2012–2020.
<p><i>Risk rating</i></p>	<p>Low risk Specified risk</p>
<p>3.2.2</p>	<p>Primary feedstock shall not be sourced from forest areas where site productivity is low and, according to local definitions or norms, the areas are classified as low-productive or difficult to regenerate.</p>
<p><i>Findings</i></p>	<p>Scale of assessment</p> <p>In Lithuania, there are several distinguishable forest types categorised based on e.g. species composition and site productivity. The assessment will focus on analysing whether there are low-productivity types and if those exist, whether they are addressed in Lithuanian legislation and regulations. The scale of assessment covers all legally defined forests in Lithuania.</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>3.2.2 continued <i>Findings continued</i></p>	<p>Analysis</p> <p>Lithuanian forest typology has been developed and revised throughout the 1900s. Forest types are defined by the growing conditions and characteristic species composition (Ministry of Environment, 2016).</p> <p>Site indices (SI) are often used to describe the species-specific measure of forest productivity with the height of a stand at a particular age; the first ones were developed as early as the 1800s (Kędziora et al. 2020). When using the site index, productivity is usually classified from I-V with best-productivity sites in class I and lowest-productivity sites in class V (or lower). Forest productivity can be defined in other ways too: a common benchmark for low production in the boreal region is <1 m³ per ha per year (e.g. Hämäläinen et al. 2018, Hämäläinen et al. 2019). In Lithuania, the level of forest productivity is measured and evaluated through site indices. In addition, productivity is evaluated by annual increment and stand volumes.</p> <p>Forest management practice in Lithuania – as stakeholder consultation suggests – is based on forest management plans which set out the priorities, goals, and measures for forest management. Among the main goals of forest management, the forest management plans mention the maintenance and increase of forest productivity, and forest management practice aims to maintain or increase the productivity of forests, and to protect low-productive forests.</p> <p>Lithuanian legislation requires the forest owner to regenerate every clear-cut forest stand (including low-productive stands) within three years and the regenerated forest must be of the same or better condition and productivity level as the cut forest.</p> <p>It is stated in the approval of the methodology for setting the rate of main forest felling that mature conifer stands with site index (SI) Va or lower and mature deciduous stands with SI V or lower are excluded from the felling rate calculations i.e. they are not included in the fellings. The methodology is applied to state forests but private forest owners can harvest stands with any SI.</p> <p>A substantial portion of low-productive forest (such as wetland forests) is under some kind of protection regime (e.g. they are included in the protected area network or representative area network).</p> <p>Enforcement and monitoring</p> <p>The Environmental Protection Department enforces and monitors the Law on Forests and the related regulations, including the implementation of calculated felling rates. Forests are monitored regularly in the NFI.</p> <p>Risk classification and justification</p> <p>Based on the evidence presented above, the risk for non-compliance with this indicator is concluded as ‘specified’ as primary feedstock can be sourced from low-productivity forest areas in private forests.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> – Consultation of a local expert – Review of Lithuanian forest typology – Scientific literature – Applicable legislation
<p><i>Evidence reviewed</i></p>	<ul style="list-style-type: none"> – Law on Forests (22.11.1994). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.6036/asr – Law on Protected Areas (11.06.2015). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/cf9f9132b60d11e6a3e9de0fc8d85cd8?jfwid

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>3.2.2 continued <i>Evidence reviewed continued</i></p>	<ul style="list-style-type: none"> – Hämäläinen, A., Strengbom, J., Ranius, T. (2018). Conservation value of low-productivity forests measured as the amount and diversity of dead wood and saproxylic beetles. <i>Ecol Appl</i>, 28: 1011-1019. https://doi.org/10.1002/eap.1705 – Hämäläinen, A, Strengbom, J, Ranius, T. (2019). Low-productivity boreal forests have high conservation value for lichens. <i>J Appl Ecol</i>. 2020; 57: 43– 54. https://doi.org/10.1111/1365-2664.13509 – Kędziora, W., Tomusiak, R., Bore, T. (2020). Site index research: a literature review. <i>Forest Research Papers</i> 81: 91-98. DOI: 10.2478/frp-2020-0010 – Ministry of Environment. (2016). The Forest Owner's Elementary (Miško savininko elementorius). https://gamtosknyga.lt/wp-content/uploads/2017/10/Misko-savininko-elementorius-2017.pdf?x13947 – On the approval of the methodology for setting the rate of main forest felling (Instruction of the Minister of Environment, 02.07.2008). https://www.e-tar.lt/portal/lt/legalAct/TAR.EA72E37B9B75/asr
<p><i>Risk rating</i></p>	<p>Low risk Specified risk</p>
<p>3.2.3</p>	<p>Primary 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).</p>
<p><i>Findings</i></p>	<p>Scale of assessment</p> <p>The Lithuanian National Forest Inventory (NFI) hosted by the State Forest Service includes the assessment of forest carbon stocks. All legally defined forests, and key species, habitats, ecosystems, and nature conservation areas within them are relatively well surveyed.</p> <p>Analysis</p> <p>The EU considers high carbon stocks to be in wetlands, peatlands and forests (EU REDII, EU Glossary Item: “Land with high carbon stock”). In the context of forest ecosystems, mature and old-growth forests have the highest carbon stocks and old-growth forests are also important for biodiversity (e.g. Molina-Valero et al., 2021, Kėniņa et al. 2019, Nord-Larsen et al. 2019, Seedre et al. 2015, Luyssaert et al. 2008). The European Green Deal (European Commission, 2019) and the EU Biodiversity Strategy for 2030 (European Commission, 2020) emphasise the need to protect the remaining primary and old-growth forests that store large amounts of carbon. Additionally, they address the need to increase the quantity, quality, and resilience of European forests overall. Wetlands and natural peatland ecosystems classified as non-forest mires are outside the scope of this indicator but mature and old-growth forests and wetland forests will be assessed.</p> <p>Forest protection started in Lithuania in the early 1900s and the protected area network developed throughout the century especially in the 1980s. Several new protected areas were also established as a part of the Natura 2000 network when Lithuania joined the EU in 2004 (State Service for Protected Areas: “The History of Evolution”).</p> <p>Lithuanian forests are relatively well surveyed and all major HCV areas are identified. In recent decades, some inventories have been carried out: for example, a woodland key habitat survey in 2001 and the identification of possible Natura 2000 sites in 2002-2004 (Nature Research Centre & Institute of Botany, 2010). Currently, there is sufficient information concerning HCV forest location, key species, habitats and ecosystems pertaining to biodiversity. No major knowledge gaps concerning the above exist, and data about biodiversity in the country is updated regularly. However, in practice, the identified areas are not always adequately protected (National Audit Office of Lithuania, 2022).</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>3.2.3 continued <i>Findings continued</i></p>	<p>Biologically valuable forests in Lithuania belong to 13 habitat types defined by the EU: 9010* Western Taiga, 9020* Fennoscandian hemiboreal natural old broad-leaved deciduous forests (Quercus, Tilia, Acer, Fraxinus or Ulmus) rich in epiphytes, 9050 Fennoscandian herb-rich forests with Picea abies, 9060 Coniferous forests on, or connected to, glaciofluvial eskers, 9070 Fennoscandian wooded pastures, 9080* Fennoscandian deciduous swamp woods, 9160 Sub-Atlantic and medio-European oak or oak-hornbeam forests of Carpinion betuli, 9180* Tilio-Acerion forests of slopes, screes and ravines, 9190 Old acidophilous oak woods with Quercus robur on sandy plains, 91D0 Bog woodland, 91E0* Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae), 91F0 Riparian mixed forests of Quercus robur, Ulmus laevis and Ulmus minor, Fraxinus excelsior or Fraxinus angustifolia, along the great rivers (Ulmenion minoris), and 91T0 Central European lichen Scots pine forests (Ministry of Environment, 2020b). Approximately 12% of the total forest area in Lithuania belongs to these habitats (Ministry of Environment, 2020a).</p> <p>Virtually all Lithuanian forests have been influenced by human action at some point. There are some remaining primary forests of which approximately three-quarters are strictly protected (Sabatini et al. 2018). The area of forest stands older than 100 years and represents only 7% of all forests (Ministry of Environment & State Forest Service, 2023). Three EU-defined wetland forest types are found in Lithuania: 9080* Fennoscandian deciduous swamp forest, 91D0 Bog woodland, and 91E0* Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae).</p> <p>Overall, the state of forest protection is decent in Lithuania: most ecologically important old-growth forests have been identified and protected. However, some shortcomings have been identified: for example, a detailed audit of the country's forests from protection and conservation perspectives was carried out in 2022 by the National Audit Office of Lithuania. Some of the key results were that forests and their natural values are not adequately protected, the forestry objectives set out in the strategic planning documents have not been met, and the designation of areas important for the conservation of the habitats is delayed (especially Natura 2000) (National Audit Office of Lithuania, 2022).</p> <p>For a more detailed assessment of the different HCV categories, see indicator 2.1.1.</p> <p>Enforcement and monitoring</p> <p>The Environmental Protection Department enforces the Law on Forests and its subsequent regulations while the State Service for Protected Areas covers the Law on Protected Areas.</p> <p>The Department of Cultural Heritage is responsible for the supervision of compliance with restrictions on cultural areas and objects of the cultural and historical heritage associated with trees and forests. Regular monitoring of enforcement is conducted and reported by the concerned agencies.</p> <p>Risk classification and justification</p> <p>Based on the evidence provided above, the risk of non-compliance with this indicator is categorised as specified. There may be areas with combined attributes of high carbon stocks and HCV that are not protected and may thus be used for sourcing primary feedstock.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> – Applicable legislation – Public reports and plans – Scientific literature – Websites of government agencies and ministries
<p><i>Evidence reviewed</i></p>	<ul style="list-style-type: none"> – EU Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora (Habitats Directive). – EU Glossary Item: "Land with high carbon stock". https://knowledge4policy.ec.europa.eu/glossary-item/land-high-carbon-stock_en

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3.2.3 continued

Evidence reviewed continued

- EU Renewable Energy Directive (RED)II – DIRECTIVE (EU) 2018/ 2001 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL – of 11 December 2018 – on the promotion of the use of energy from renewable sources (europa.eu)
- European Commission. (2019). The European Green Deal. Brussels, 11.12.2019.
- European Commission. (2020). EU Biodiversity Strategy for 2030: “Bringing nature back into our lives”. Brussels, 20.5.2020.
- Kēniņa L, Jaunslaviete I, Liepa L, Zute D, Jansons Ā. (2019). Carbon Pools in Old-Growth Scots Pine Stands in Hemiboreal Latvia. *Forests*. 10. <https://doi.org/10.3390/f10100911>
- Law on Forests (22.11.1994). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.6036/asr>
- Law on Protected Areas (11.06.2015). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/cf9f9132b60d11e6a3e9de0fc8d85cd8?jfwid>
- Hämäläinen, A., Strengbom, J., Ranius, T. (2018). Conservation value of low-productivity forests measured as the amount and diversity of dead wood and saproxylic beetles. *Ecol Appl*, 28: 1011-1019. <https://doi.org/10.1002/eap.1705>
- Hämäläinen, A, Strengbom, J, Ranius, T. (2019). Low-productivity boreal forests have high conservation value for lichens. *J Appl Ecol*. 2020; 57: 43– 54. <https://doi.org/10.1111/1365-2664.13509>
- Kędziora, W., Tomusiak, R., Bore, T. (2020). Site index research: a literature review. *Forest Research Papers* 81: 91-98. DOI: 10.2478/frp-2020-0010
- Ministry of Environment. (2016). The Forest Owner’s Elementary (Miško savininko elementorius). <https://gamtosknyga.lt/wp-content/uploads/2017/10/Misko-savininko-elementorius-2017.pdf?x13947>
- Law on Protected Areas (11.06.2015). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/cf9f9132b60d11e6a3e9de0fc8d85cd8?jfwid>
- Luysaert, S., Schulze, E. D., Börner, A., Knohl, A., Hessenmöller, D., Law, B., Ciais, P., Grace, J. (2008). Old-growth forests as global carbon sinks. *Nature*. 455: 213-215. 10.1038/nature07276
- Ministry of Environment. (2020a). Article 17 National Summary Factsheet – Lithuania. Reporting period 2013-2018.
- Ministry of Environment. (2020b). Annex I: Article 17 National Summary Factsheet. Lists of habitats and species reported by the Member State with the overall conclusions of conservation status and overall conservation status trend for the reporting period 2007-2012 and 2013-2018.
- Ministry of Environment and State Forest Service. (2023). Lithuanian Statistical Yearbook of Forestry 2021.
- Molina-Valero, J. A., Camarero, J. J., Álvarez-González, J. G., Cerioni, M., Hevia, A., Sánchez-Salguero, R., Martín-Benito, D., Pérez-Cruzado, C. (2021). Mature forests hold maximum live biomass stocks. *Forest Ecology and Management*. 480. <https://doi.org/10.1016/j.foreco.2020.118635>
- National Audit Office of Lithuania. (2022). Protection of Lithuanian forestry resources. National Audit Office of Lithuania. (2022). Protection of Lithuanian Forestry Resources. Vilnius. <https://www.valstybeskontrolė.lt/EN/Product/24091/protection-of-lithuanian-forestry-resources>
- Nature Research Centre & Institute of Botany. (2010). Eb svarbos natūralių buveinių inventorizacijos metodinių dokumentų parengimas ir bandomoji natūralių buveinių inventorizacija. 1 paslaugos sudėtinė dalis: Lietuvoje vykdytų ir vykdomų gamtinių teritorijų inventorizavimo ir kartografavimo sistemų, metodų ir rezultatų pritaikomumo analizės atlikimas. Ataskaita. (Report on the inventorying and mapping of natural habitats in Lithuania).
- Nord-Larsen, T., Vesterdal, L., Bentsen, N. S., Larsen, J. B. (2019). Ecosystem carbon stocks and their temporal resilience in a semi-natural beech-dominated forest. *Forest Ecology and Management*. 447: 67-76. <https://doi.org/10.1016/j.foreco.2019.05.038>

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	<ul style="list-style-type: none"> – Sabatini, F. M., Burrascano, S., Keeton, W. S., Levers, C., Lindner, M., Pötzschner, F., Verkerk, P. J., Bauhus, J., Buchwald, E., Chaskovsky, O., Debaive, N., Horváth, F., Garbarino, M., Grigoriadis, N., Lombardi, F., Duarte, I. M., Meyer, P., Midteng, R., Mikac, S., Mikoláš, M., Motta, R., Mozgeris, G., Nunes, L., Panayotov, M., Ódor, P., Ruete, A., Simovski, B., Stillhard, J., Svoboda, M., Szwagrzyk, J., Tikkanen, O.-P., Volosyanchuk, R., Vrska, T., Zlatanov, T., Kuemmerle, T. (2018). Where are Europe's last primary forests? Diversity and Distributions. 24: 1426–1439. https://doi.org/10.1111/ddi.12778 – Seedre, M., Kopáček, J., Janda, P., Bače, R., Svoboda, M. (2015). Carbon pools in a montane old-growth Norway spruce ecosystem in the Bohemian Forest: Effects of stand age and elevation. Forest Ecology and Management. 346:106-113. https://doi.org/10.1016/j.foreco.2015.02.034 – State Service for Protected Areas: “The History of evolution”. https://vstt.lrv.lt/en/about-protected-areas/the-history-of-evolution
<i>Risk rating</i>	Low risk Specified risk

Criterion 3.3 – Feedstock sourcing shall not compete with wood sourcing for long-lived wood products

Element	Description and analysis
3.3.1	Feedstock sourcing shall be in compliance with the principles of cascading use, high quality stem wood shall not be used as feedstock if it is in substantial demand for long-lived products in the Supply Base.
<i>Findings</i>	<p>Scale of assessment</p> <p>The Lithuanian Law on Forests regulates the directing of forest management. The Law on the Heat Industry (2003) regulates the state management of the heat sector, the activities of heat sector entities, their relations with heat consumers, their interrelations, and their responsibilities.</p> <p>Analysis</p> <p>The Lithuanian Law on Forests provides the main legislative framework for forestry in the country.</p> <p>The Law neither has any provision directly related to forest-based feedstock sourcing and biomass production nor restricts the use of wood and forest biomass for bioenergy purposes. Based on expert consultation, Lithuanian legislation does not restrict the use of wood for energy purposes in any way. In practice, mostly low-quality wood is used, but nothing prohibits the use of higher-quality wood. Firewood, wood waste, and other low-value wood are the main sources of biomass fuel production in Lithuania. Industrial roundwood is used in sawmilling and the wood-based panel industry (particleboard, fibreboard, and veneer sheets).</p> <p>The recent amendments to the Law on the Heat Industry encourage the use of logging and wood industry residues in heat production but do not restrict the use of other solid biomass per se. Based on the expert consultation, high-quality timber is not used for energy production on a large scale. On a small scale, high biomass prices might encourage the use of high-quality roundwood for energy production from time to time.</p> <p>The gross consumption of wood-based biomass (firewood and wood waste including imported wood and wood from non-forest areas) in 2020 was 6.4 million m³ (Ministry of Environment & State Forest Service, 2023). Wood-based biomass is an important energy source in Lithuania: in 2020, 25% of gross energy consumed inland was produced from renewable sources, and the share of wood from renewable sources was approximately 80% (Ministry of Environment & State Forest Service, 2023). The use of biomass for energy is promoted in national planning, and the demand for wood-based biomass is expected to rise in the future which in turn may lead to an increase in logging and imports, depending on the market situation (Ministry of Transport and Communications, 2020).</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>3.3.1 continued <i>Findings continued</i></p>	<p>The National Energy and Climate Plan (NECP) (2030) states that the ratio of wood used in industry and for energy would remain the same regardless of an increase in demand. The NECP (2030) does address the concept of cascading use of wood, although not explicitly.</p> <p>The stakeholder consultation suggests that the prices for timber and pulpwood have consistently been higher than the prices for biomass apart from aspen pulpwood whose price has, at times, been the same as that for fuelwood (wood prices in State Forest Enterprise are reported in the Lithuanian Statistical Yearbook of Forestry); it can be argued that the markets encourage the use of wood according to the cascading principle. However, it was also noted that before the war in Ukraine, Lithuania imported about 1.5 million m³ of wood chips from Belarus annually. As imports from Belarus have now completely stopped, the shortfall in supply is mostly met by harvesting trees outside forests and thus, forest biomass harvesting has not increased. Nevertheless, two large bioenergy operators (combined wood consumption capacity of 1 million m³ per year) are now entering the Lithuanian market, and the future will show whether forest harvesting for biomass feedstock sourcing as well as energy wood prices increase in the future.</p> <p>Enforcement and monitoring</p> <p>The Ministry of Transport and Communications prepares the National Energy and Climate Plan. The Ministry of Energy governs the energy sector.</p> <p>Risk classification and justification</p> <p>Lithuanian legislation does not have any requirements directly related to forest-based feedstock sourcing and biomass production nor does it restrict the use of wood and forest biomass for bioenergy purposes although the concept of cascading use is recognised to a certain extent in the latest National Energy and Climate Plan.</p> <p>Biomass can sometimes be produced from wood that could be used for other purposes, but such cases do not occur frequently. Based on the evidence presented above, the risk of non-compliance with this requirement is classified as low. Nevertheless, the developments both in biomass demand and price must be considered when reassessing this indicator in the future. In particular, the prices of pulp wood and wood chips need to be closely monitored.</p> <p>The market alone might not be enough to ensure the cascading use of wood in the coming years if market disturbances and societal disturbances similar to those caused by the war continue.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> – Applicable legislation – Public reports and plans – Official statistics – Expert consultation
<p><i>Evidence reviewed</i></p>	<ul style="list-style-type: none"> – Law on the Heat Industry (20.05.2003). https://e-seimas.lrs.lt/portal/legalActEditions/lt/TAD/TAIS.211524 – Ministry of Environment and State Forest Service. (2023). Lithuanian Statistical Yearbook of Forestry 2021. – Ministry of Transport and Communications. (2020). National Energy and Climate Plan 2021-2030.
<p><i>Risk rating</i></p>	<p>Low risk Specified risk</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

Principle 4 – Feedstock sourcing benefits people and communities

Criterion 4.1 – Decent working conditions are provided, and labour rights are safeguarded

Element	Description and analysis
4.1.1	<p>Freedom of association and the right to collective bargaining shall be respected in the workplace.</p>
Findings	<p>Scale of assessment</p> <p>Lithuania has signed and ratified the ILO Declaration on Fundamental Principles and Rights at Work including ILO Conventions 98 on Right to Organise and Collective Bargaining, 87 on Freedom of Association and Protection of Right to Organise and 135 on the Protection of Workers' Representatives. Lithuania has also ratified the ILO governance Conventions, e.g., No. 144 on Tripartite Consultation.</p> <p>The Lithuanian Constitution (1992) establishes in Article 50, the right to form and join trade unions and the workers' right to strike for protecting their economic and social interests. According to Article 138 of the Constitution, the international treaties ratified by the Parliament (Seimas) shall be a constituent part of the legal system of the Republic of Lithuania.</p> <p>The Labour Code (Article 8) also provides that international agreements shall be directly applied to labour relations if they do not require a national-level regulatory act. The Labour Code Chapter II specifies that trade unions have the right to organise themselves at any level and represent their members collectively and individually. Trade unions shall have the exclusive right to bargain collectively and conclude collective agreements e.g. on wages, work and rest time and social guarantees.</p> <p>Analysis</p> <p>The Lithuanian legislation protects the employees' rights for collective bargaining through trade unions. Trade unions are parties to collective agreements negotiated at sector or enterprise levels. Any collective agreements shall be registered with the Ministry of Social Security and Labour. The forestry sector does not have a collective agreement. The State Forest Enterprise has made a collective agreement with its employees that is valid until the end of the year 2023 and a new agreement is likely to be made once the validity of the current one expires.</p> <p>The integration of international labour laws into national legislation and their appropriate implementation is supported by the Tripartite Council represented by national-level trade unions, employers' organisations, the private sector and the Government (21 members in total – seven representatives from each party). The Government is represented by two Ministries of Social Security and Labour, two Ministries of Economy and Innovation, two representatives of the Ministry of Finance and a representative of the Government Chancellery. Employers' organisations are represented by two representatives delegated by the Confederation of Lithuanian Industrialists and one representative each from the association "Investors' Forum", the Confederation of Lithuanian Employers, the Association of Lithuanian Chambers of Commerce, Industry and Crafts, the Lithuanian Business Confederation, and the Chamber of Agriculture of the Republic of Lithuania. The trade union organizations are represented by three representatives of the Confederation of Lithuanian Trade Unions, two representatives of the Republican United Trade Union and two representatives of the Lithuanian trade union "Solidarumas". The trilateral co-operation is organised respecting the provisions of ILO Convention 144 and the Labour Code (Article 185).</p> <p>The objective of trilateral co-operation is to exchange information, reach a balance between different interests, and develop social-economic policy, which would reflect the interests and attitudes of social partners.</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>4.1.1 continued <i>Findings continued</i></p>	<p>The Lithuanian Trade Union Confederation (LPSK) is the largest trade union organisation. It comprises 24 branches of trade unions including the Lithuanian Federation of Forest and Wood Workers Trade Unions. LPSK is a member of the Tripartite Council, the International Trade Union Confederation (ITUC), and the European Trade Union Confederation (ETUC). It also co-operates with the International Labour Organisation (ILO). The Lithuanian Federation of Forest and Wood Workers Trade Unions (LMPF Lietuvos misko ir misko pramones darbuotoju profesiniu sajungu federacija) has 28 regional member trade unions representing forest workers.</p> <p>At workplaces with more than 20 employees, a Works Council represents the employees and in smaller workplaces, an Employees' Trustee is elected. According to the Labour Code (Article 22), the trade union has the right to exercise non-governmental supervision and control of compliance with labour laws.</p> <p>Most of the State Forest Enterprise has established trade unions, which means that they have an agreement with the employees which is periodically reviewed. The Union of State Forestry Employees also made a collective labour agreement with the State Forest Enterprise in 2018. It is valid till the end of 2023.</p> <p>Enforcement and monitoring</p> <p>The State Labour Inspectorate is the authority responsible for the enforcement of the Labour Code in all sectors including forestry. The State Labour Inspectorate inspects compliance with the provisions of the Labour Code including those related to employment contracts, work pay, organisation of work and rest, as well as the enforcement of respective legislation.</p> <p>Any individual complaints on a collective labour dispute or interest are first addressed in the Dispute Commission represented by parties of the collective agreement, secondly by an independent Mediator and thirdly by a Labour Arbitration Committee nominated by the State Labour Inspectorate. The decision of the Committee is binding.</p> <p>Risk conclusion and justification</p> <p>The legislation and the procedures for its implementation protect the rights of association and collective bargaining. The risk is classified as low.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> – Existing legislation – Level of enforcement – Public information – Existing bargaining procedures
<p><i>Evidence reviewed</i></p>	<ul style="list-style-type: none"> – Constitution of the Republic of Lithuania (25.10.1992). https://lrkt.lt/en/about-the-court/legal-information/the-constitution/192 – ILO C144: Tripartite Consultation (International Labour Standards) Convention, 1976. https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100::NO:12100:P12100_ILO_CODE:C144:NO – ILO: "Homepage". http://www.ilo.org/ – ILO: "National Labour Law Profile: Lithuania". https://www.ilo.org/ifpdial/information-resources/national-labour-law-profiles/WCMS_158913/lang--en/index.htm

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>4.1.1 continued <i>Evidence reviewed continued</i></p>	<ul style="list-style-type: none"> – Labour Code (4.6.2002). https://e-seimas.lrs.lt/rs/legalact/TAD/TAIS.391384/ – Lithuanian Federation of Forest and Wood Workers Trade Unions: “Homepage”. www.lmpf.lt – Lithuanian Trade Union Confederation (LPSK): “Homepage”. http://www.lpsk.lt – Ministry of Social Security and Labour: “Presentation of the Labour Code”. https://socmin.lrv.lt/en/activities/labour-and-employment/labour-law/presentation-of-the-labour-code – Ministry of Social Security and Labour: “Register of collective agreements and procedures for registering collective agreements”. https://socmin.lrv.lt/lt/paslaugos/administracines-paslaugos/kolektyviniu-sutarciu-registras-ir-kolektyviniu-sutarciu-registravimo-tvarka – On approval of the composition of the Tripartite Council of the Republic of Lithuania (Resolution of the Government, 22.06.2022). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/18de0236f2c311ecbfe9c72e552dd5bd?jfwid=19p2z9amtp – State Labour Inspectorate: “State Labour Inspectorate information in the English language”. https://www.vdi.lt/Forms/EN.aspx – State Labour Inspectorate: “VDI stiprina prevenciją priverstiniam darbui – steigiamos specializuotos grupės”. https://www.vdi.lt/Forms/Tekstai.aspx?Tekstai_ID=3709
<p><i>Risk rating</i></p>	<p>Low risk Specified risk</p>
<p>4.1.2</p>	<p>Forced or compulsory labour shall not be used.</p>
<p><i>Findings</i></p>	<p>Scale of assessment</p> <p>Lithuania has ratified the fundamental ILO Convention 29 on Forced Labour and the related Protocol of 2014 and the Convention on Abolition of Forced Labour. By signing the Protocol in 2020 Lithuania is committed to adopting effective measures to combat forced labour, including trafficking in persons, debt bondage, or forced domestic labour, and to provide victims with protection and access to effective remedies, including compensations. According to the Lithuanian Constitution (Article 48), forced labour is prohibited.</p> <p>By definition, forced labour is any work, or service, including forced begging, that a victim of human trafficking is forced to do against their will i.e. using physical violence or threats or otherwise denying the opportunity to resist or taking advantage of the victim’s dependence or vulnerability, using deception, accepting or paying money, or receiving or providing other benefits to a person who controls the victim.</p> <p>Analysis</p> <p>According to the Law on Employment (Article 56) the work is illegal if, among others, the employer has not concluded an employment contract in writing according to the established procedure or has not given a notification of the hiring of the employee to a territorial office of the State Social Insurance Fund Board at least one hour before the start of the work. State Tax Inspectorate also receives information on the contracted work.</p> <p>Information on work contracts shall also be given to the State Labour Inspectorate (at least for non-EU citizens). An employer breaching the regulations on registration of workers and their contracts is subject to fines issued by the State Labour Inspectorate. If the illegally employing party is a subcontractor, the direct contractor shall assume subsidiary liability for the financial obligations if it has not applied due diligence to avoid the situation.</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

4.1.2 continued *Findings continued*

Representatives of the State Tax Inspectorate, the Police, the Financial Crime Investigation Service, the State Labour Inspectorate and other services are aligned under the Joint Operations Centres and aim to prevent illegal and undeclared work and potentially related crimes against the financial system, economy or business regulations. The state allocates funds for projects on the prevention of trafficking of people and the provision of social assistance to the victims of forced labour.

The website of the State Labour Inspectorate contains information on what constitutes human trafficking and forced labour, how to identify it and where to turn if a person has been a victim of human trafficking. The website also provides information on basic labour rights and the legal environment. Training is provided to the authorities and employment service organisers (e.g. EURES) on the identification of human trafficking and forced labour.

The majority of infringements of labour relations relate to non-recording of the time worked, overtime, work on holidays, and rest times. Breaches in remuneration by paying envelope wages or incorrect wages are also common, resulting in non-payment of taxes. Also, breaches of the procedures for hiring foreigners were identified. However, the forestry sector is not among the high-risk sectors for undeclared work.

Enforcement and monitoring

The Ministry of Social Security and Labour is responsible for implementing labour legislation and taking all measures to avoid forced or compulsory labour in the country.

Controlling undeclared work is delivered by the following five state institutions: the State Tax Inspectorate, State Labour Inspectorate, State Social Insurance Fund Board, Financial Crime Investigation Service and Police Department. Most of the inspections are carried out and most infringements are identified by the State Labour Inspectorate and State Tax Inspectorate. The State Labour Inspectorate has an Illegal Activities Supervision Department, and it has had since 2020 specialised groups to control and prevent forced labour.

The State Labour Inspectorate is assigned the function to carry out and co-ordinate the control of Undeclared Work and check employment-related information in the course of the control operations. The State Tax Inspectorate carries out control of undeclared (illegal) work, payment of envelope wages, infringements of the procedure of wage accounting and payment, as well as other functions delegated to it.

The Police Department is responsible for carrying out control and prevention of undeclared (illegal) work and human trafficking for forced labour. The State Social Insurance Fund Board receives employer notifications of signed employment contracts and collects such information in its information system.

Cases of forced labour are usually reported by non-governmental organisations, one of which is the Centre for Combating Human Trafficking and Exploitation (KOPŽI). People usually contact the organisation first and then the information is passed on to the State Labour Inspectorate. There are also direct appeals by the affected persons or third parties.

There are good contact points for any person that is a victim of human trafficking: the National Association against Human Trafficking has a 24-hour telephone helpline in several languages. The State Labour Inspectorate may be contacted by mail or phone. Also, the Criminal Police Bureau address any information on human trafficking.

Risk conclusion and justification

The legislation prohibits forced labour and there are appropriate institutional structures to enforce the laws and carry out inspections. The risk of forced labour in forestry is low.

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>4.1.2 continued <i>Means of verification</i></p>	<ul style="list-style-type: none"> – Existing legislation – Level of enforcement – Public information
<p><i>Evidence reviewed</i></p>	<ul style="list-style-type: none"> – Committee of the Parties to the Council of Europe Convention on Action against Trafficking in Human Beings. Report submitted by the authorities of Lithuania on measures taken to comply with Committee of the Parties Recommendation CP/Rec(2019)09 on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings (2020): https://rm.coe.int/cp-2020-12-lithuania/1680a09ade – Constitution of the Republic of Lithuania (25.10.1992). https://lrkt.lt/en/about-the-court/legal-information/the-constitution/192 – European Commission. (2017). Factsheet on Undeclared Work – Lithuania. https://ec.europa.eu/social/ajax/BlobServlet?docId=18169&langId=en – ILO: “Homepage”. http://www.ilo.org/ – ILO: “Lithuania renews commitment to combat forced labour”. https://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/forced-labour/WCMS_737738/lang--en/index.htm – Law on Employment (21.6.2016). https://e-seimas.lrs.lt/portal/legalAct/en/TAD/5f0be3809c2011e68adcd1bb2f432d1 – Ministry of Social Security and Labour: “Lithuania has committed to the consistent fight against forced labour”. https://socmin.lrv.lt/en/news/lithuania-has-committed-to-the-consistent-fight-against-forced-labour – State Labour Inspectorate: “VDI stiprina prevenciją priverstiniam darbui – steigiamos specializuotos grupės”. https://www.vdi.lt/Forms/Tekstasi.aspx?Tekstai_ID=3709
<p><i>Risk rating</i></p>	<p>Low risk Specified risk</p>
<p>4.1.3</p>	<p>Child labour shall not be used.</p>
<p><i>Findings</i></p>	<p>Scale of assessment Lithuania has ratified the ILO Conventions 138 on Minimum Age and C182 on Worst Forms of Child Labour. In 1992 Lithuania ratified the UN Convention on the Rights of the Child.</p> <p>The conditions under which a child below 16 years of age may work are regulated by the Labour Code and the Law on Fundamentals of Protection of the Rights of the Child.</p> <p>Analysis The children shall attend compulsory education training up to 16 years of age. Children between the ages of 14 and 16 can perform light work that meets their physical abilities. A child shall have written consent from a parent/guardian and a medical certificate stating that he / she is fit to work. Working hours for children of 14 to 16 years are 6 hours per day / 30 hours a week or seven and 35 hours respectively. A separate document regulates the labour of persons under 18 years of age.</p> <p>The State Labour Inspectorate carries out field inspections in sectors where there is a risk of undeclared work. The data of the State Labour Inspectorate does not mention the illegal work of people under 18 in the forestry sector.</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>4.1.3 continued <i>Findings continued</i></p>	<p>For foreign children, the Ministries of Social Security and Labour, Interior and Health have developed joint procedures (order No, A1-229/IV-289/V491) for conducting interviews with the unaccompanied foreign minors to ensure that the children receive the support they need and that they are not at risk of being exploited.</p> <p>Enforcement and monitoring The Ministry of Social Security and Labour is responsible for managing the protection of children's rights in the labour market and implementing the related international conventions. The State Labour Inspectorate enforces the Labour Code.</p> <p>Risk conclusion and justification The risk of using child labour in forestry is low.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> – Existing legislation – Level of enforcement – Public Information
<p><i>Evidence reviewed</i></p>	<ul style="list-style-type: none"> – Committee of the Parties to the Council of Europe Convention on Action against Trafficking in Human Beings. Report submitted by the authorities of Lithuania on measures taken to comply with Committee of the Parties Recommendation CP/Rec(2019)09 on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings (2020): https://rm.coe.int/cp-2020-12-lithuania/1680a09ade – Constitution of the Republic of Lithuania (25.10.1992). https://lrkt.lt/en/about-the-court/legal-information/the-constitution/192 – Labour Code (4.6.2002). https://e-seimas.lrs.lt/rs/legalact/TAD/TAIS.391384 – Law on Fundamentals of Protection of the Rights of the Child (28.09.2017). https://www.e-tar.lt/portal/lt/legalAct/5a6c9100adc011e79d87b6f526384a70/asr – Protection of Minors: “Children and Youth Protection in Lithuania”. https://www.protection-of-minors.eu/en/country/LT – Resolution on the approval of the procedure for the organization of employment, work and professional training of persons under eighteen years of age, description of the conditions of employment of children (28.6.2017). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/15b820215cd411e7a53b83ca0142260e/asr – State Labour Inspectorate: “Žiniasklaidai”. https://www.vdi.lt/Forms/TemaZiniasklaidai.aspx
<p><i>Risk rating</i></p>	<p>Low risk Specified risk</p>
<p>4.1.4</p>	<p>Workers shall not be discriminated in hiring, remuneration, access to training, promotion, termination or retirement.</p>
<p><i>Findings</i></p>	<p>Scale of assessment The Lithuanian Constitution, the law on Equal Opportunities and Criminal Code along with the Labour Code prohibit discrimination. The legislation covers the following aspects of equal opportunities: a person may not have his / her rights restricted in any way or be granted any privileges based on his or her sex, race, nationality, language, origin, social status, religion, convictions or opinions. The legislation implements the EU Directives on equal treatment.</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

4.1.4 continued

Findings continued

Analysis

Law on Equal Opportunities (Article 7) specifies that the employer must implement equal opportunities at work and in public service. The employer shall:

1. Apply uniform selection criteria and conditions when hiring for work, or civil service, except for the cases specified in clauses 4 and 7 of Article 2, Part 9 of this Law.
2. Create equal working and civil service conditions, opportunities to raise qualifications, seek professional training, retrain, gain practical work experience, as well as provide equal benefits.
3. Use the same criteria for evaluating work and public servants' official activities.
4. Use the same criteria for dismissal from work and civil service.
5. Pay equal wages for work of the same or equal value.
6. To ensure that persons seeking employment, employees or civil servants do not experience harassment, sexual harassment and no discrimination instructions are given at the workplace.
7. Take measures so that employees, civil servants who have filed a complaint about discrimination, participated in a case about discrimination or reported discrimination, their representatives or persons testifying and providing explanations about discrimination, are not persecuted and are protected from hostile behaviour or negative consequences.
8. Take appropriate measures to enable disabled people to get a job, work, pursue a career or study, including the provision of appropriate working conditions, if such measures do not disproportionately burden the employer's duties.
9. Take measures to ensure that an employee or civil servant is not discriminated against in the workplace due to the granting of paternity leave, leave to look after a child.

According to Article 11 of the Law on Equal Opportunities, it is also prohibited to specify requirements that give preference based on gender, race, nationality, citizenship, language, origin, social status, faith, beliefs or views, age, sexual orientation, disability, ethnicity, religion in advertisements for employment, public service or education, except in jobs that are based e.g. on religion and faith.

The Law on Equal Opportunities of Women and Men specify the rights and violations of equal rights related to gender. In addition to the above-mentioned conditions for recruitment and remuneration, employers shall apply equal terms and working conditions for men and women and prevent any harassment. Persecution of employees complaining about discrimination is also prohibited.

The Laws apply to legal and natural persons in the public and private sectors.

Enforcement and monitoring

The Ministry of Social Security and Labour is responsible for implementing the legislation and taking all measures to ensure equal rights in any groups related to the above.

Supervision of the Equal Opportunities Act's implementation is done by the Equal Opportunities Controller/Ombudsperson appointed by the parliament for five-year periods. He/she solves the issues assigned to their competence. Every natural person, legal entity, other organisation and its unit has the right to submit (online) a complaint to the equal opportunities controller regarding a violation of equal opportunities. If the equal opportunities controller has identified signs of a violation of equal opportunities from public information media or other sources, they may initiate an investigation on his initiative.

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>4.1.4 continued <i>Findings continued</i></p>	<p>However, the reporting rate on discrimination is low due to the low level of public awareness. It has been argued that the Equal Opportunities Ombudsperson can only issue administrative fines which have only been issued on a few occasions. Most decisions are recommendations or warnings. The office has also limited resources to address the broad scope of potential types of discrimination. It can be noted here that consultations with stakeholders carried out for the purpose of revising this RRA did not flag any issue concerning discrimination in hiring, remuneration, access to training, promotion, termination or retirement.</p> <p>Risk conclusion and justification</p> <p>Lithuania has robust legislation and institutions to address discrimination although independent studies recommend improvements, especially in decreasing discrimination based on ethnic background or gender identity. The threshold to make discrimination complaints is low, although awareness of the procedures is needed. Evidence of systematic discrimination in the forest sector was not identified. The risk of breaching this indicator in wood sourcing is low.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> – Existing legislation – Level of enforcement – Public information
<p><i>Evidence reviewed</i></p>	<ul style="list-style-type: none"> – Constitution of the Republic of Lithuania (25.10.1992). https://lrkt.lt/en/about-the-court/legal-information/the-constitution/192 – Criminal Code (26.9.2000). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.111555 – Equal Opportunities Ombudsperson’s Office. (2017). Report: The Office of the Equal Opportunities Ombudsman as a national equality body: legal regulations and operations. https://www.lygybe.lt/lt/teisine-informacija/tyrimai-ir-analizes/692 – Equal Opportunities Ombudsperson’s Office: “Homepage”. https://www.lygybe.lt/lt – European Commission against Racism and Intolerance (ECRI). (2016). ECRI Report on Lithuania (fifth Monitoring Cycle): Adopted on 18 March 2016. https://www.refworld.org/country,,COECRI,,LTU,,584e8ee04,0.html – Law on Equal Opportunities for Women and Men (11.05.2017). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/3486ee123cfa11eabd71c05e81f09716
<p><i>Risk rating</i></p>	<p>Low risk Specified risk</p>
<p>4.1.5</p>	<p>Wages paid to workers shall meet or exceed the legal minimum wage or where there is no statutory minimum wage industry norms shall be met or exceeded.</p>
<p><i>Findings</i></p>	<p>Scale of assessment</p> <p>According to the Labour Code (Chapter IX), the government approves every year the minimum wage paid for unskilled workers after receiving the recommendation of the Tripartite Council.</p> <p>Analysis</p> <p>The Government approved the minimum wage of EUR 840 starting from 1 January 2023, in line with the recommendation of the Tripartite Council. The wage was increased by 15.1%. The minimum hourly rate amounted to EUR 5.14. The minimum wage is applicable in the forestry sector including both state and private forests.</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>4.1.5 continued <i>Findings continued</i></p>	<p>The decision was made after an evaluation of the economic situation in the country, the financial possibilities of the State budget and the potential of municipalities and employers, especially small employers, to pay a higher minimum monthly wage.</p> <p>The increase in the minimum wage affected approximately 127,000 employees (7% of the workforce). Average wages in supervisory works in the forest sector are around EUR 2,400 per month and for workers around EUR 1,100 per month.</p> <p>Enforcement and monitoring</p> <p>The State Labour Inspectorate enforces the legislation on payment of the minimum wage. The consultations with stakeholders carried out for the purpose of revising this RRA did not flag any short-comings in the State Labour Inspectorate's enforcement and monitoring of legislation on the pay-ment of minimum wage in forestry.</p> <p>Risk conclusion and justification</p> <p>The risk of underpayment in legal working contracts is low.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> – Existing legislation – Level of enforcement – Public information
<p><i>Evidence reviewed</i></p>	<ul style="list-style-type: none"> – European Employment Services (EURES): “Labour market information: Lithuania”. https://eures.ec.europa.eu/living-and-working/labour-market-information/labour-market-information-lithuania_en – https://worldsalaries.com/average-salary-in-lithuania/ – Labour Code (4.6.2002). https://e-seimas.lrs.lt/rs/legalact/TAD/TAIS.391384/ – Ministry of Social Security and Labour: “Remuneration for work”. https://socmin.lrv.lt/en/activities/labour-and-employment/labour-law/remuneration-for-work
<p><i>Risk rating</i></p>	<p>Low risk Specified risk</p>
<p>4.1.6</p>	<p>Working hours shall comply with legal requirements.</p>
<p><i>Findings</i></p>	<p>Scale of assessment</p> <p>The Labour Code provides that regular working time is eight hours a day and 40 hours a week. Young workers (14–16 years) may work six to seven hours a day up to 30 to 35 hours a week. The normal work week is five days with two days of rest.</p> <p>Analysis</p> <p>The Labour Code defines the normal working time and gives the thresholds for paid overtime work. It also stipulates the extra compensation to be paid for working overtime (1.5 times the wage) or on public holidays (normally twice the wage). The rule is applicable in the forestry sector including both state and private forests.</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>4.1.6 continued <i>Findings continued</i></p>	<p>Enforcement and monitoring</p> <p>The State Labour Inspectorate enforces the Labour Code. Employers are obliged to record the working hours of each employee. The consultations with stakeholders carried out for the purpose of revising this RRA did not flag any shortcomings in the State Labour Inspectorate enforcement and monitoring of legislation on working hours in forestry.</p> <p>Risk conclusion and justification</p> <p>The legislation sets explicit requirements for working time and its monitoring. Employers must record working and rest times. Based on the available information there is a low risk of illegal working times in forestry work.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> – Legislation – Enforcement – Public information
<p><i>Evidence reviewed</i></p>	<ul style="list-style-type: none"> – Labour Code (4.6.2002). https://e-seimas.lrs.lt/rs/legalact/TAD/TAIS.391384/
<p><i>Risk rating</i></p>	<p>Low risk Specified risk</p>
<p>4.1.7</p>	<p>Workers shall have access to health care provisions, sickness benefits, retirement benefits, invalidity benefits, death benefits, workers' compensation.</p>
<p><i>Findings</i></p>	<p>Scale of assessment</p> <p>The Labour Code and the Law on Safety and Health at Work are the main laws regulating the policies and implementation of health and safety at work. Lithuania has not ratified the ILO Convention 155 on Occupational Health and Safety or Convention 187 on Promotional Framework for Occupational Health and Safety but it has transposed satisfactorily the relevant EU Directives on the improvement of work safety into the national legislation. The emphasis is on an employers' responsibility to create a safe working environment.</p> <p>Persons working under employment contracts in the territory of the Republic of Lithuania (including persons posted to the country for a period longer than one year) or not in the territory of the Republic of Lithuania, but under employment contracts concluded with insurers registered in the country, are insured against pension, sickness, maternity, unemployment, social insurance from accidents at work and occupational diseases.</p> <p>All persons covered by compulsory health insurance have the right to receive treatment and health care services in Lithuania without additional fees. Employers and employees pay contributions to the State Social Insurance Fund which is also supported by the state funds. The Board of Social Insurance Fund (SoDra) pays employees sickness, maternity, unemployment insurance and labour accident benefits.</p> <p>Analysis</p> <p>People in Lithuania should have compulsory health insurance to receive medical care free of charge. People under work contracts in all sectors including forestry are covered by insurance.</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>4.1.7 continued <i>Findings continued</i></p>	<p>Also, foreign-posted workers are entitled to insurance if their work contract exceeds one year. The insurance covers pensions (including disability), sickness, maternity, unemployment, social insurance from accidents at work and occupational diseases. Insured employees may acquire services from public or private health centres that have a contract with the National Health Insurance Fund. People that are not covered by the insurance (e.g. self-employed) shall pay the health care costs themselves or take voluntary insurance to cover the costs.</p> <p>Employers and employees finance social insurance pensions. Employers shall register the work contracts and issue a work certificate (identity card) to the employee. In the construction and woodworking sectors, Lithuania requires a transparent worker identification QR code which allows competent authorities to verify the status of workers and their legal right to work in the country.</p> <p>Regarding pensions for retired employees, the payment of the employee's share (3% of gross wage) is not compulsory and only a small share of employees pay it; this will reflect in the amount of pension they could receive when retiring. Currently, the state contributes 1.5% to the individual's savings and the National Health Insurance Fund is not involved in financing normal old-age pensions.</p> <p>Employees registered in the Social Security Fund are entitled to compulsory social insurance and the listed benefits. Workers doing undeclared work fail to receive any benefits.</p> <p>Enforcement and monitoring</p> <p>In Lithuania, the Ministry of Social Security and Labour implements the state policy in the field of occupational health and safety (OHS) according to its competence (together with the Ministry of Health). The State Labour Inspectorate operating under the auspices of the Ministry of Social Security and Labour is responsible for the prevention of accidents at work and occupational diseases, safety and health at work, and the prevention of violations of legal acts regulating labour.</p> <p>Risk conclusion and justification</p> <p>People have access to sickness and other benefits and pensions through the Social Insurance Fund which collects funds from employers and employees. The risk of failing to receive the benefits is low in legal, declared work relations.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> – Legislation – Public information – Analytical reports
<p><i>Evidence reviewed</i></p>	<ul style="list-style-type: none"> – Commission on Safety and Health: “Darbuotojų saugos ir sveikatos komisija”. https://socmin.lrv.lt/lt/administracine-informacija/tarybos-ir-komisijos/darbuotoju-saugos-ir-sveikatos-komisija – European Agency for Safety and Health at Work: “National focal points – Lithuania”. https://osha.europa.eu/en/about-eu-osha/national-focal-points/lithuania – European Commission: “Employment, Social Affairs & Inclusion”. https://ec.europa.eu/social/home.jsp?langId=en – European Labour Authority. (2023). Transparent Worker Identification Code. https://www.ela.europa.eu/sites/default/files/2023-02/Good-practice-fiche-Lithuania-transparent-worker-identification-%28qr%29-code-%282023%29.pdf – Labour Code (4.6.2002). https://e-seimas.lrs.lt/rs/legalact/TAD/TAIS.391384/ – Law on Health and Safety at Work (16.7.2003). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/3c128c0120eb11e58a4198cd62929b7a?jfwid=j1u6

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>4.1.7 continued <i>Evidence reviewed continued</i></p>	<ul style="list-style-type: none"> – Medaiskis, T., Jankauskiene, D. ASISP country document update 2014: Pensions, health and long-term care, Lithuania. https://ec.europa.eu/social/BlobServlet?docId=12972&langId=en – Milieu Law & Policy Consulting. (2015). Evaluation of the EU Occupational Health and Safety Directives – Country Summary Report for Lithuania. https://ec.europa.eu/social/BlobServlet?docId=17116&langId=fr – Ministry of Social Security and Labour: “Safety and Health at Work”. https://socmin.lrv.lt/en/activities/labour-and-employment/safety-and-health-at-work – Ministry of Social Security and Labour: “Social Insurance Contributions”. https://socmin.lrv.lt/en/activities/social-insurance-1/social-insurance-contributions – National Health Insurance Fund: “Homepage”. https://ligoniukasa.lrv.lt/en/ – Occupational Health Centre: “Homepage”. https://www.hi.lt/en/ – Regulations on Occupational Risk Assessment (25.10.2012). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.435935?jfwid
<p><i>Risk rating</i></p>	<p>Low risk Specified risk</p>
<p>4.1.8</p>	<p>Training shall be provided for all workers to allow them to implement the conditions set out in all elements of the SBP standards relevant to their responsibilities.</p>
<p><i>Findings</i></p>	<p>Scale of assessment</p> <p>Lithuanian labour legislation supports training in various forms and stages of the career. The Law on Employment, the Labour Code, the Law on Vocational Training and the Law on Non-Formal Adults Education and Continued Learning govern the measures to support training.</p> <p>The Labour Code (Article 61) stipulates that collective agreements shall outline the principles for training opportunities for employees. Article 270 specifies that the employer shall provide employees with adequate training on the health and safety aspects of the work.</p> <p>The Law on Employment (Articles 36-38) provides training opportunities for unemployed persons. The measures to support training include:</p> <ul style="list-style-type: none"> – vocational training – employment under an apprenticeship employment contract – advanced training. <p>The Order on Forest Work Safety Rules (DT 1–96) requires that every forest worker must have a certificate proving the required qualifications for the work. The State Labour Inspectorate or e.g. fire protection authorities, conduct field checks to verify the legal competence and qualifications of the workers, including those related to workplace safety.</p> <p>Analysis</p> <p>Lithuania has a comprehensive education and training system in the forest and environmental sectors. The Kaunas College of Forestry and Environmental Engineering has bachelor programmes in silviculture, forest management, land management etc. It also provides vocational training for forest workers on e.g. forest machinery and greenery management. Vytautas Magnus University provides education in forestry, applied ecology, wildlife management and urban and recreational forestry.</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

4.1.8 continued

Findings continued

Lithuania has developed vocational education and provides options for modular and part-time studies for updating competence. The challenge has been a decreasing labour force and a low commitment to life-long learning.

According to the health and safety legislation, employers are obliged to provide regular training on workplace safety and ensure that workers have the required qualifications proven by relevant certificates for the assigned work. Records of attendance at the training must be provided at the request of the relevant authority. The State Labour Inspectorate or e.g. fire protection authorities, conduct field checks to verify the legal competence and qualifications of the workers.

The State Forest Enterprise manages the 1.1. million ha of state-owned forest, makes annual training plans for all levels of operation based on the identified need for competence development. Forestry works and harvesting operations are typically performed by contractors in state and private forests. Contractors shall have the necessary qualifications and corresponding documents for evidence. When the State Forest Enterprise requests tenders for specific works, it asks for the documents on the contractors' qualifications and skills needed for the job. Especially in state forestry, training and qualification requirements are important risk mitigation measures in the due diligence of their operation.

Other forestry organisations also have the practice to upgrade their employees' qualifications by offering them a range of courses. There is good availability of studying opportunities in forestry – online / live courses, free courses for private forest owners and EU-supported training programmes. Employers also support competence building through participation in practical short courses.

Currently, there is a shortage of highly qualified machine operators in forestry and basic forestry workers with a lower skill level. The demand for forest specialists with a university or higher education background decreased slightly.

Enforcement and monitoring

The State Labour Inspectorate, the State Forest Service, authorities of fire protection, the Directorate General of State Forests, and regional offices of the Environmental Protection Agency control the competence of workers and the level of required risk mitigation.

Risk conclusion and justification

Analysis above shows that there is a comprehensive system of occupational training in Lithuania and that it allows relevant forest workers to implement the conditions set out in all elements of the SBP standards relevant to their responsibilities. The risk is classified as low.

Means of verification

- Existing legislation
- Level of enforcement
- Forestry schools

Evidence reviewed

- Employment Service. (2022). Darbo rinka skaičiai. <https://uzt.lt/data/public/uploads/2023/03/2022-darbo-rinka-skaiciais.pdf>
- EU CEDEFOP: “Vocational education and training in Europe”. <https://www.cedefop.europa.eu/en/tools/vet-in-europe/systems/lithuania-2019>
- Governance Coordination Centre: “About us”. <https://governance.lt/en/apie-mus/>
- Kaunas College of Forestry and Environmental Engineering: “Homepage”. <https://www.kmaik.lt/>
- Labour Code (4.6.2002). <https://e-seimas.lrs.lt/rs/legalact/TAD/TAIS.391384/>
- Law on Employment (21.6.2016). <https://e-seimas.lrs.lt/portal/legalAct/en/TAD/5f0be3809c2011e68adcda1bb2f432d1>

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>4.1.8 continued <i>Evidence reviewed continued</i></p>	<ul style="list-style-type: none"> – Law on Safety and Health at Work (1.7.2003). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/3c128c0120eb11e58a4198cd62929b7a?jfwid=j1u6 – Law on the State Labour Inspectorate (14.10. 2003). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.220102/asr – Order on Forest Work Safety Rules (22.11.1996). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.35090 – State Forest Service: “Homepage”. https://amvmt.lrv.lt/ – Vytautas Magnus University Agriculture Academy: “Faculty of Forest Sciences and Ecology”. https://zua.vdu.lt/en/faculties/faculty-of-forest-sciences-and-ecology/
<p><i>Risk rating</i></p>	<p>Low risk Specified risk</p>
<p>4.1.9</p>	<p>Mechanisms shall be in place for resolving grievances and disputes in the workplace.</p>
<p><i>Findings</i></p>	<p>Scale of assessment</p> <p>Grievance procedures related to the workplace are regulated in the Labour Code.</p> <p>The State Labour Inspectorate requires the establishment of territorial Labour Dispute Commissions that address complaints related to individual and collective labour disputes on the law. It also addresses disputes concerning the dismissal of a worker, legality of removal from work and non-pecuniary damage, which were previously settled by courts.</p> <p>If the disputes cannot be solved between employer and employee(s) the following institutions may contribute to arbitration:</p> <ul style="list-style-type: none"> – Employee trustee: if the average number of employees is less than 20 a trustee is elected for three years at the general meeting of the employer’s employees. – Labour Council: the Labour Council must be established at the initiative of the employer when the average number of employees of the employer is 20 or more. – Trade Union. – State Labour Inspectorate: regional Labour Dispute Commissions. – Administrative Court. <p>Analysis</p> <p>Any labour dispute should first be arbitrated within the workplace with the help of an employee trustee or labour council. Secondly, trade unions may help in the process.</p> <p>Labour Code Article 286 provides that individual labour disputes shall be heard by Labour Dispute Commissions or if the Commission fails to reach an agreement or the employee is unsatisfied with the resolution, he / she can take the case to the Court. The Commission is the mandatory primary body for dispute resolutions.</p> <p>The Labour Dispute Commissions are established locally, and they shall have an equal number of employees’ and employers’ representatives. In 2020 there were 22 Labour Dispute Commissions in the country. The term of a nominated Commission is two years. Labour Code Chapter XIX describes in detail the procedural arrangements for the Commission.</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>4.1.9 continued <i>Findings continued</i></p>	<p>Collective labour disputes are heard primarily by a Conciliation Commission and secondly by Labour Arbitration in the District Courts. Individual workers may file complaints to the State Labour Inspectorate by email, phone, or other means. The contact information is available online. However, it has to be noted here, as suggested by the stakeholder consultation, that when the forest management plan for the state forests is prepared, communities are usually not involved. Therefore, often the community members are surprised by the clearcutting in state forests adjacent to their properties. This does not however necessarily lead to any grievances and disputes.</p> <p>Enforcement and monitoring The State Labour Inspectorate enforces the Labour Code and addresses any complaints.</p> <p>Risk conclusion and justification The procedures to address labour-related disputes are well described. The risk of failing to meet the requirements of the indicator is low.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> – Existing legislation – Enforcement
<p><i>Evidence reviewed</i></p>	<ul style="list-style-type: none"> – Labour Code (4.6.2002). https://e-seimas.lrs.lt/rs/legalact/TAD/TAIS.391384/ – State Labour Inspectorate: “Persons service. Complaints and reports”. https://www.vdi.lt/Forms/Tekstas1.aspx?Tekstai_ID=716
<p><i>Risk rating</i></p>	<p>Low risk Specified risk</p>
<p>4.1.10</p>	<p>Safeguards shall be put in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures.</p>
<p><i>Findings</i></p>	<p>Scale of assessment</p> <p>The Law on Health and Safety at Work and the Labour Code provide for the employer’s and employee’s responsibilities to ensure safe conditions for the work. There are specific regulations e.g. on the safety of forestry work, machinery or chemical use.</p> <p>Policy-level co-ordination on occupational health is ensured through the Occupational Health and Safety Commission based on the tripartite co-operation of social partners (Law on Health and Safety at Work). The Commission has an advisory role to the Ministry of Social Security and Labour, the Ministry of Health, and other state bodies and institutions. It may establish county-level and municipal commissions.</p> <p>Health and safety in forestry are controlled by the State Labour Inspectorate. In addition to the control and monitoring functions, it guides health and safety issues in different business sectors. The Inspectorate declared the number of checks on ensuring the requirements of legal acts regulating the safety and health of forestry and agriculture sectors in 2021, which is 7.4% of total checks (compared to 40% in the construction sector).</p> <p>The forestry and agriculture sectors have in general the lowest number of violations of labour laws in the country with 5% of all identified violations in 2021 compared to 16% in the construction sector (State Labour Inspectorate 2022). These two sectors have the lowest number of violations of employee safety and health law – 8.9%, compared to the highest 34.1% in the construction sector (State Labour Inspectorate 2022).</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>4.1.10 continued <i>Findings continued</i></p>	<p>Analysis</p> <p>Occupational health and safety (OHS) services in enterprises are ensured by the employer, who may appoint one or more OHS specialists or establish an OHS service. In the absence of competent staff able to ensure all OHS service functions, the employer can hire external OHS services.</p> <p>Enterprises shall make a risk assessment on occupational health in line with the templates of the State Labour Inspectorate and take measures to mitigate the identified risks. Personal protective equipment shall be used when the risks cannot be avoided or sufficiently mitigated by technical means of collective protection or by measures, methods or procedures of work organisation. The employer shall provide protective equipment.</p> <p>Qualification requirements set for forestry enterprises and workers including their demonstration with a certificate contribute to workplace safety. Employers shall also provide regular training on workplace safety. The numbers for people working illegally (undeclared) in the forestry sector were not available but the figure for combined forestry, agriculture and fishery was 8% in 2021.</p> <p>The forestry sector in Lithuania is considered to be among the most dangerous sectors regarding work safety. The State Inspectorate annual report of 2022 (State Labour Inspectorate 2022) reported three cases of occupational diseases. Lethal accidents occur one to three times a year. The typical occupational diseases include vibration (45%), repetitive hand movements (22%), noise (16%), manual handling of loads (14%) and Lyme disease (3%) (2021 data).</p> <p>Within the EU forest sector, Lithuania is the country with the fourth highest risk concerning health and safety. Lithuania has a risk level of 3 /100,000, while the highest in the EU is 3.5 /100,000 employees.</p> <p>Enforcement and monitoring</p> <p>The State Labour Inspectorate promotes, enforces and monitors work safety.</p> <p>Risk conclusion and justification</p> <p>The health and safety legislation is well developed and there are established procedures for its implementation and enforcement. Based on the relatively high-risk rate for health and safety injuries the risk is concluded to be specified.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> – Existing legislation – Level of enforcement – Monitoring records
<p><i>Evidence reviewed</i></p>	<ul style="list-style-type: none"> – Labour Code (4.6.2002). https://e-seimas.lrs.lt/rs/legalact/TAD/TAIS.391384/ – Law on Safety and Health at Work (1.7.2003). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/3c128c0120eb11e58a4198cd62929b7a?jfwid=j1u6 – Order on Forest Work Safety Rules (22.11.1996). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.35090 – State Labour Inspectorate. (2022). 2021 report on the state of occupational safety and health and the implementation of the labour code, laws and regulations on occupational safety and health and industrial relations in enterprises in the Republic of Lithuania. https://www.vdi.lt/PdfUploads/DSS_tendencijos_2017_2021.pdf
<p><i>Risk rating</i></p>	<p>Low risk Specified risk</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

Criterion 4.2 – Feedstock sourcing benefits communities

Element	Description and analysis
4.2.1	<p>Negative social and community impacts shall be identified and avoided.</p>
Findings	<p>Scale of assessment The scale of assessment covers social and community impacts concerning operations in legally defined forests.</p> <p>Analysis The 18th Government of the Republic of Lithuania decided that drafting a National Forest Agreement would decide on the policies on the protection and use of forests. The Ministry of Environment co-ordinated the stakeholder process in 2021 that involved about 40 different organisations representing different interests and almost 400 participants. The national-level Agreement was achieved on six thematic issues out of the nine issues discussed. The Agreement document consists of a framework objective, vision and agreements.</p> <p>The updated strategy of the State Forest Enterprise for 2022-2026, approved in 2022, has as one of its goals: To increase the sustainability of forest ecosystems by the following tasks:</p> <ul style="list-style-type: none"> – To increase the sustainability of forest ecosystems. – To increase the absorption of greenhouse gases by increasing the volume of stands in III-IV gr. in the forests. – Increase the absorption of greenhouse gases by planting new forests. <p>The State Forest Enterprise implements the strategy and increases GHG absorption by planting new forest areas, restoring damaged wetlands and carrying out other activities that contribute to the restoration and preservation of forest ecosystems.</p> <p>At the municipal level, there is also consideration of local communities and organisations. Regional departments of the State Forest Enterprise must publicly present the forest management plans (that are prepared every 10 years), or other important forestry activities. They place advertisements about planned presentations on their website. In case of planned important forestry activities (for example in case of activities in forests of high importance), there are community gatherings announced to explain forest-cutting plans where community members can express their worries about planned operations.</p> <p>Also, the Law on Territorial Planning defines the main levels of terrestrial spatial planning – state, municipal and local.</p> <p>Territorial planning and decisions on areas for forestry, nature protection or other development are laid down at national, municipal, or local levels. Information on the start of territorial planning shall be published and the public can give feedback on the planning objectives and content of the draft plan. Regulations on the Provision of Information to the Public, Public Consultation and Participation in Adopting Decisions Relating to Territorial Planning specify the procedures for public consultation and consideration of the interests of local communities.</p> <p>The State Forest Service shall be informed of planned forestry operations. Private forest owners, before logging, must apply through the Environmental Permits Information System (ALIS) which informs the State Forest Service of the intention to make forest cuttings. The decision is received within five working days but if co-ordination with other authorities is required, then the term is extended to 20 working days after the submission of documents through the system.</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>4.2.1 continued <i>Findings continued</i></p>	<p>For afforestation of non-forest land, the owner must apply to the Territorial Department of National Land Service. To change the purpose of land use, the district head's decision is required.</p> <p>The Law of the Land states that when planting a forest on agricultural land, in the cases determined by the Government, the main target purpose of land use must not be changed or changed only according to special territorial planning documents (land management or forest management projects).</p> <p>Forestry has multiple impacts on local communities. Employment and incomes typically have positive impacts whereas conflicts may arise on land use, access to forest resources, nature protection or water protection. Preservation of cultural landscape may also raise debate. Spatial land use planning is usually based on the mutual understanding of the desired development in land use. Forest land is allocated for forestry or other uses of forests, including protection.</p> <p>Enforcement and monitoring</p> <p>The Ministry of Environment co-ordinates the implementation of the National Forest Agreement.</p> <p>Legislation on territorial planning and forest management sets the minimum requirements for stakeholder engagement and consideration of public opinions.</p> <p>Risk conclusion and justification</p> <p>The risk for sourcing wood from forests where forestry operations have had unmitigable adverse impacts on local communities is low.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> – Legislation – Enforcement – Public information
<p><i>Evidence reviewed</i></p>	<ul style="list-style-type: none"> – Law on Territorial Planning (27.09.2016). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/dde75b13095011e78dacb175b73de379?jfwid – Ministry of Environment. (2022). Project preparing the National Forest Agreement. https://nacionalinismiskusitarimas.lt/wp-content/uploads/2022/06/Nacionalinis-susitarimas-del-misku-ateities.pdf – National Forest Agreement: “Homepage”. https://nacionalinismiskusitarimas.lt/ – State Forest Service: “Planavimo dokumentai”. https://amvmt.lrv.lt/lt/administracine-informacija/planavimo-dokumentai – VASAB – Vision, Strategies around the Baltic Sea. (2021). Country Fiche on Terrestrial Spatial Planning. Lithuania. https://vasab.org/wp-content/uploads/2021/08/Lithuania_Country_Fiche_Spatial_Planning_Aug2021.pdf
<p><i>Risk rating</i></p>	<p>Low risk Specified risk</p>
<p>4.2.2</p>	<p>Feedstock sourcing shall positively contribute to the local economy, including employment.</p>
<p><i>Findings</i></p>	<p>Scale of assessment</p> <p>Forestry is an industry sector that traditionally uses local resources and the beneficiaries of forestry activities are often residents of Lithuania. Forestry contractors are typically local or regional enterprises so resulting in those revenues contributing to the local economy.</p> <p>Lithuania produces roundwood for its consumption and export. Energy feedstock is collected from harvesting residues and in silvicultural harvesting of low-quality stands.</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>4.2.2 continued <i>Findings continued</i></p>	<p>The annual consumption of roundwood in Lithuania was 4.9 million m³ in 2020 (wood produced outside of forest land is not included). The amount of exported roundwood decreased by 1% compared to 2019 and totalled 2.1 million m³. The import of roundwood increased by 14% and amounted to 0.3 million m³.</p> <p>Analysis</p> <p>The total value added in the forest sector including furniture manufacturing reached EUR 1.9 billion in 2019. Forestry and logging generated EUR 247 million of value added (0.56% of total value-added GDP) and it was 8% lower compared to 2018. The number of operating companies engaged in forestry and logging was 973 at the beginning of 2021.</p> <p>In 2020, domestic investment in the forestry and logging companies was EUR 47 million (17% of total investment in the forest sector) with a decrease of one-fifth compared to the year 2019. The net profit of the State Forest Enterprise was EUR 56.5 million in 2021 and EUR 105.8 million in 2022. The sharp increase in profit was due to the price inflation for sawn timber.</p> <p>In 2020, forestry and logging provided work for 9,532 persons. The trend is decreasing with a 16% decrease in jobs since 2016. The State Forest Enterprise employed 2,888 persons. The forestry and logging sector provides employment opportunities that can be significant at a local level and generates tax income for society.</p> <p>Enforcement and monitoring</p> <p>Legal and declared labour contracts contribute to the local economy through tax revenues and also by increasing local consumption. The State Labour Inspectorate and the State Tax Inspectorate and Social Insurance Fund are the relevant authorities to ensure that society gains the designated benefits from forestry activities.</p> <p>Risk conclusion and justification</p> <p>Forestry and logging operations are based on local/regional entrepreneurship, and there are enough enforcement measures to control the payment of statutory fees. The risk level is low.</p>
<p><i>Means of verification</i></p>	<ul style="list-style-type: none"> – Legislation on labour – Enforcement – Statistics on forestry
<p><i>Evidence reviewed</i></p>	<ul style="list-style-type: none"> – Ministry of Environment and State Forest Service. (2023). Lithuanian Statistical Yearbook of Forestry 2021. https://osp.stat.gov.lt/services-portlet/pub-edition-file?id=41540 – State Labour Inspectorate: https://www.vdi.lt/PdfUploads/EngReportSLI2015.pdf
<p><i>Risk rating</i></p>	<p>Low risk Specified risk</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

4.2.3	Food, water supply or high conservation values (HCV) that are essential for the fulfilment of basic needs of communities shall be maintained or enhanced.
<i>Findings</i>	<p>Scale of assessment</p> <p>The main necessities of local communities are related to recreation and mushroom and berry picking. These activities are important for many people for leisure or perquisite income. The right to free access to the forest is guaranteed in the Law on Forests and other legal acts. With a few exceptions, all forests are available for berry and mushroom picking. Exceptions include only the nature reserves and berry plantations in the forest. Free access is not allowed within 100 metres of built properties on private land.</p> <p>Territorial planning and decisions on nature protection sites mark the areas to be excluded from forestry activities due to their high conservation values or other characteristics. Information on the start of territorial planning shall be published, and the public can give feedback on the planning objectives and content of the draft plan.</p> <p>Analysis</p> <p>Forest management does not play a significant role concerning community necessities, because the Lithuanian forest cover is more than 30% and various succession stage forest is available across the landscape.</p> <p>The prevailing practice is that the State Forest Enterprise allows local people to collect the residues from cutting areas for a symbolic fee and with notice to the regional department of SFE. In addition, local people can buy fuel wood without any restrictions. There is no lack of fuel wood for local people and forest operations do not cause or influence the lack of basic needs for local people.</p> <p>Enforcement and monitoring</p> <p>The State Service for Protected Territories marks and controls the use of protected areas. Free access to forests or use of non-timber products that are not protected is allowed. The Ministry of Environment monitors their use.</p> <p>Risk conclusion and justification</p> <p>There is a low risk related to this indicator.</p>
<i>Means of verification</i>	<ul style="list-style-type: none"> – Legislation – Territorial planning – Reports
<i>Evidence reviewed</i>	<ul style="list-style-type: none"> – Constitution of the Republic of Lithuania (25.10.1992). https://lrkt.lt/en/about-the-court/legal-information/the-constitution/192 – Law on Forests (22.11.1994). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.6036/asr – Ministry of Environment: "Homepage". https://am.lrv.lt/en/ – State Forest Enterprise. (2022). Report on the activities of the State Forest Enterprise for the first half of 2022. https://governance.lt/wp-content/uploads/2018/08/VMU_2022_06.pdf
<i>Risk rating</i>	Low risk Specified risk

Annex 1 Detailed findings for Supply Base Evaluation continued

4.2.4	<p>Legal, customary, and traditional tenure and use rights of indigenous people and local communities related to the supply base shall be identified, documented, and respected.</p>
<i>Findings</i>	<p>Scale of assessment There are no indigenous communities in Lithuania but there are traditional/national minorities.</p> <p>Analysis The Constitution of the Republic of Lithuania (Art. 37 and 45) regulates the rights of people belonging to national minorities. The protection of rights and freedoms of national minorities and the people belonging thereto forms an integral part of the international protection of human rights and falls within the ambit of the field of international co-operation. The Republic of Lithuania has ratified the key international agreements regulating the rights of national minorities. The Laws on Citizenship, the State Language, Education, Provision of Information to the Public, Religious Communities and Associations, Political Parties and Political Organisations, the Fundamentals of Protection of the Rights of the Child, and other legal acts guarantee and regulate the protection of the rights of people belonging to national minorities. Lithuania has ratified relevant UN and European EU agreements and conventions protecting human rights and protection of the rights of minority groups. The Law on Forests provides for free access to state and private forests and the right to collect e.g. berries and mushrooms. The access can be restricted based on justified reasons.</p> <p>Enforcement and monitoring The Environmental Protection Department enforces and monitors the Law on Forests, and the Environmental Protection Agency monitors other environmental legislation. The EU report (2021) and stakeholder consultation do not point to any shortcomings in the enforcement and monitoring of the Law on Forests. The above points to effective enforcement and monitoring of the legislation.</p> <p>Risk conclusion and justification The risk related to the indicator on the protection of indigenous rights and local communities is low.</p>
<i>Means of verification</i>	<ul style="list-style-type: none"> – Customary and traditional tenure and use rights are identified and documented – Appropriate mechanisms to resolve disputes
<i>Evidence reviewed</i>	<ul style="list-style-type: none"> – Acting organisations in charge of traditional community's people affairs – Constitution of the Republic of Lithuania (25.10.1992). https://lrkt.lt/en/about-the-court/legal-information/the-constitution/192 – Convention 157 for the Protection of National Minorities (01.02.1995). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.96635 – Department of National Minorities under the Government of Lithuania: “National Minorities”. https://tmde.lrv.lt/en/national-minorities – Law on Forests (22.11.1994). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.6036/asr – Ministry of Culture: “Homepage”. https://lrvk.lrv.lt/ – EU. 2021. Final report on the implementation of the new bioenergy sustainability criteria set out in the revised Renewable Energy Directive (REDIIIBIO – final report). Brussels, Belgium.
<i>Risk rating</i>	<p>Low risk Specified risk</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

4.2.5	<p>Mechanisms shall be in place for resolving grievances and disputes, relating to tenure and use rights of the forest and other land management practices.</p>
<i>Findings</i>	<p>Scale of assessment</p> <p>Grievances and disputes, including those relating to tenure and use rights, related to management practices in all forests and work conditions are regulated by basic legislation, namely: the Constitution, the Lithuanian Civil Code, the Labour Code, the Code of Administrative Offences, etc.</p> <p>Analysis</p> <p>In Lithuania, the land restitution process is in its final stage. The restitution process had explicit procedures to avoid and mitigate disputes. For any disputes that could not be resolved with the third-party land measurement organisation, it was possible to apply to a higher controlling institution (for instance, the Territorial Department of the National Land Service or to the courts). The Constitution protects property rights.</p> <p>Disputes related to land/forest management practices should be addressed in dialogue with affected parties. In principle, the forest owner may manage the forests in line with the Law on Forests providing other restrictions do not apply e.g. due to a protection status or other regulations.</p> <p>People have the right to express their views on specific issues and demonstrate at a more general level and issue complaints on issues that affect them. Complaints of citizens about the abuse of authority or bureaucratic intransigence by state and municipal officials (except for judges) shall be examined by the Parliament's (Seimas) Ombudsman, who shall have the right to submit a proposal before a court for dismissing the guilty officials from office. There are mechanisms for grievance procedures addressing tenure rights and land use planning. Grievances related to forest use – be it under state or private ownership – in planned areas shall be resolved between the parties or ultimately taken to court.</p> <p>Regarding forest use, the State Forest Enterprise examines the requests and complaints of citizens, representatives of local communities and other persons, following the Law on Public Administration and the rules for examining requests and complaints of individuals in public administration entities.</p> <p>Enforcement and monitoring</p> <p>The National Land Service under the Ministry of Environment and State Register Centre enforce laws and regulations related to land registry and the Environmental Protection Department enforces the Law on Forests. Regular monitoring of the enforcement is conducted and reported by the concerned agencies. Information about the Register and Cadastre including cadastral data and maps, ownership and its history, and property restrictions is publicly accessible online.</p> <p>Risk conclusion and justification</p> <p>The grievance processes are in place. The risk is classified as low.</p>
<i>Means of verification</i>	<ul style="list-style-type: none"> – Existing legislation – Level of enforcement – Public documents
<i>Evidence reviewed</i>	<ul style="list-style-type: none"> – Civil Code of the Republic of Lithuania (18.07.2000). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.245495 – Constitution of the Republic of Lithuania (25.10.1992). https://lrkt.lt/en/about-the-court/legal-information/the-constitution/192 – Law on Forests (22.11.1994). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.6036/asr

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>4.2.5 continued <i>Evidence reviewed</i></p>	<ul style="list-style-type: none"> – Law on Land (19.05.2016). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/4bf34552ad7211e68987e8320e9a5185?jfwid= – Law on Land Reform (25.7.1991). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.2718?jfwid= – Law on Restoration of Citizens Rights to Extant Real Property (1.7.1997). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.41505/asr – Law on Territorial Planning (27.9.2016). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/dde75b13095011e78dacb175b73de379?jfwid= – Law on the Real Property Register (24.09.1996). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.31770?jfwid= – Restoration of ownership rights to forest land (Decision of the Government, 25.8.1992)
<p><i>Risk rating</i></p>	<p>Low risk Specified risk</p>
<p>4.2.6</p>	<p>Where Indigenous Peoples' rights are identified in the Supply Base, and Free Prior and Informed Consent (FPIC) has not been achieved for the proposed and planned activities, a consultation and, if required, accommodation process shall be put in place.</p>
<p><i>Findings</i></p>	<p>Scale of Assessment In Lithuania, this indicator applies only to local and traditional communities. There are no native indigenous peoples as defined in UN definitions in Lithuania. The legislation on land use planning sets the provisions for general-level stakeholder consultations. If the land is allocated for forestry use, the Law on Forests applies. If it is allocated for conservation, the respective regulations define the allowed use.</p> <p>Analysis The indicator is not applicable in Lithuania as there are no native indigenous people in the country. Regarding HCV Category 5, the main necessities of local communities concerning forests are related to recreation, mushroom collection and berry picking. These activities are important for many people for leisure or perquisite income. The right to free access to the forest is guaranteed in the Constitution of the Republic of Lithuania, the Law on Forests and other legal acts. With a few exceptions, all forest is available for berry and mushroom picking by the general public. Exceptions include only the nature reserves and berry plantations in the forest.</p> <p>Enforcement and monitoring N/A</p> <p>Risk conclusion and justification Based on the above discussion, a low risk is assigned for this indicator.</p>
<p><i>Means of verification</i></p>	<p>– N/A</p>
<p><i>Evidence reviewed</i></p>	<p>– N/A</p>
<p><i>Risk rating</i></p>	<p>Low risk Specified risk</p>

Annex 1 Detailed findings for Supply Base Evaluation continued

4.2.7	<p>Designated cultural heritage sites shall be preserved.</p>
<i>Findings</i>	<p>Scale of assessment The scale of assessment covers the legally defined forests in Lithuania.</p> <p>Analysis Lithuania accepted the UNESCO World Heritage Convention (1975) in 1992. The country has four immovable World Heritage sites but none of them are in forest areas. Lithuania has also ratified several EU Conventions on the protection of cultural heritage.</p> <p>According to the Constitution, the state shall support culture and science and shall take care of the protection of Lithuanian historical, artistic and other cultural monuments, as well as other culturally valuable objects.</p> <p>Laws on the Protection of Immovable Cultural Heritage and Protected Areas as well as the Law on Territorial Planning guide the protection of immovable cultural sites that are potentially located in forest areas.</p> <p>Regarding HCV Category 6, in Lithuania, there are no cultural areas directly related to the forest and trees. Some forest is inside cities, manor parks, urban forest, and forest of important historical sites. Most of the forests with cultural heritage is owned by the state. Such places are managed according to various regulations and management plans. Historical places are under the supervision of the Cultural Heritage Department while urban forests and parks are managed by municipalities. There are no major problems with forests related to cultural values. A working database of immovable cultural values exists and all values are preserved by the implementation of the Law on Protection of Immovable Cultural Properties, which can be considered sufficient.</p> <p>Enforcement and monitoring The Department of Cultural Heritage under the Ministry of Culture is responsible for implementing measures to protect cultural heritage. It has 10 territorial divisions in the country. The Centre of Cultural Heritage under the Department register cultural heritages and carries out research. Municipalities also have responsibilities for the preservation of cultural heritage. Immovable cultural property is registered when the Immobile Cultural Heritage Assessment Council together with municipal institutions decide on its protection status.</p> <p>Consultations with stakeholders carried out for the purpose of this RRA revision did not flag any issues related cultural heritage in state and private forests in Lithuania.</p> <p>Risk conclusion and justification The risk that forestry operations harm sites of cultural heritage is considered low.</p>
<i>Means of verification</i>	<ul style="list-style-type: none"> – Legislation – Enforcement
<i>Evidence reviewed</i>	<ul style="list-style-type: none"> – Constitution of the Republic of Lithuania (25.10.1992). https://lrkt.lt/en/about-the-court/legal-information/the-constitution/192 – Council of Europe: “Lithuania”. https://www.coe.int/en/web/herein-system/lithuania – European Convention on the Protection of the Archaeological Heritage 1985 (ratified 1998). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.90756

Annex 1 Detailed findings for Supply Base Evaluation continued

<p>4.2.7 continued <i>Evidence reviewed continued</i></p>	<ul style="list-style-type: none">– European Cultural Convention 1954 (ratified 1992). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.31945– European Landscape Convention 2000 (ratified 2004). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.189933– Law on Protected Areas (11.06.2015). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/cf9f9132b60d11e6a3e9de0fc8d85cd8?jfwid– Law on Protection of Immovable Cultural Heritage (22.12.1994). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.15165?jfwid=– Law on Territorial Planning (27.09.2016): https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/dde75b13095011e78dacb175b73de379?jfwid– Ministry of Culture: “Conservation of historic monuments”. https://www.km.gov.lv/en/conservation-historic-monuments– UNESCO World Heritage Convention: “States Parties”. https://whc.unesco.org/en/statesparties/
<p><i>Risk rating</i></p>	<p>Low risk Specified risk</p>

Annex 2 List of experts consulted and contacts of Working Body

List of experts consulted and contacts of Working Body

Expert	Affiliation & role
Dr Sepul Barua	Team Leader and Co-ordinator of the Working Body. Risk assessment expert with a focus on SBP RRA indicators under Principles 1 (feedstock is legally sourced) and 2 (feedstock sourcing does not harm the environment); Senior Consultant and Forest Economist at Indufor.
Ms Hanna Nikinmaa	Working Body Member. Certification and sustainability expert with a focus on SBP RRA indicators under Principle 4 (feedstock sourcing benefits people and communities); Senior Advisor at Indufor.
Ms Saija Papunen	Working Body Member; Forest Inventory and GIS expert with a focus on SBP RRA indicators under Principle 3 (feedstock is only sourced from Supply Bases where the forest carbon stock is stable or increasing long term); Analyst at Indufor.
Ms Jurate Zimkiene	Working Body Member; Lithuanian forestry, certification and bioenergy expert.
Dr Marius Aleinikovas	Deputy Director for Institute of Forestry Activities, Lithuanian Research Centre for Agriculture and Forestry.
Dr Albertas Kasperavičius	Deputy Director, State Forest Service.
Mr Martas Lynikas	Deputy Director, State Forest Enterprise.
Mr Rabins Gaudel	Forest Resources Mapping Expert; Consultant at Indufor.

Working Body: Indufor Group
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Publications used

- Aukštinaitis, T., Čeičytė, L., Kosaitė, M., Liukaitytė-Kukienė, J., Merkelienė, J., Petniūnienė, K., Šaulytė, E., Znutienė, S., Zvicevičius, P., Kairienė, E., Karlionienė, D., Kavšinė, A., Šulinskas, K., Žiukelytė, I., Ozarinskienė, M., Valiukas, D., Politika, L. (2022). Lithuania's eighth national communication and fifth biennial report under the United Nations Framework Convention on Climate Change. Prepared by the Ministry of Environment.
- Andersson, Leif; Kriukelis, Rimvydas. & Skuja, Saulis. 2005. Woodland Key Habitat Inventory in Lithuania. Kaunas: Lithuanian Forest Inventory and Management Institute. & Linköping: Forestry Board of Östra Götaland.
- Chatham House. (2023). Forest Governance and Legality. Forest Governance and Legality | Chatham House
- Civil Code of the Republic of Lithuania (18.07.2000). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.245495>
- Commission Implementing Regulation (EU) No 927/2012 of 9 October 2012 amending Annex I to Council Regulation (EEC) No 2658/87 on the tariff and statistical nomenclature and the Common Customs Tariff
- Commission on Safety and Health: “Darbuotojų saugos ir sveikatos komisija”. <https://socmin.lrv.lt/lt/administracine-informacija/tarybos-ir-komisijos/darbuotoju-saugos-ir-sveikatos-komisija>
- Committee of the Parties to the Council of Europe Convention on Action against Trafficking in Human Beings. Report submitted by the authorities of Lithuania on measures taken to comply with Committee of the Parties Recommendation CP/Rec(2019)09 on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings (2020): <https://rm.coe.int/cp-2020-12-lithuania/1680a09ade>
- Constitution of the Republic of Lithuania (25.10.1992). <https://lrkt.lt/en/about-the-court/legal-information/the-constitution/192>
- Convention 157 for the Protection of National Minorities (01.02.1995). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.96635>
- Council of Europe: “Lithuania”. <https://www.coe.int/en/web/herein-system/lithuania>
- Criminal Code (26.9.2000). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.111555>
- Cultural Heritage Spatial Electronic Service Information System “KPEPIS”: <https://www.kpepis.lt/site-tree/>
- Customs of the Republic of Lithuania: https://www.lrmuitine.lt/mport/failai/e_prekyba/privatiems_asmenims/21_4_30_DUK_GB_EN.pdf
- Darnūs miškai: “Didėja sertifikuotų miškų plotai”. <https://darnusmiskai.lt/naujiena/dideja-sertifikuotu-misku-plotai>
- Department of National Minorities under the Government of Lithuania: “National Minorities”. <https://tmde.lrv.lt/en/national-minorities>
- Employment Service. (2022). Darbo rinka skaičiais. <https://uzt.lt/data/public/uploads/2023/03/2022-darbo-rinka-skaiciais.pdf>
- Environmental Protection Agency: “Map of Environmental Protection Agency activities”. <https://www.gamta.lt/apie-agentura/aplinkos-apsaugos-agenturos-veiklu-zemelapis/153>
- Environmental Protection Agency: “Statistics and data on air quality”. <https://aaa.lrv.lt/lt/veiklos-sritys/oras/oro-kokybes-statistika-ir-duomenys>
- Environmental Protection Agency: Current air quality. <http://193.219.53.11/ap3/>
- Equal Opportunities Ombudsperson’s Office. (2017). Report: The Office of the Equal Opportunities Ombudsman as a national equality body: legal regulations and operations. <https://www.lygybe.lt/lt/teisine-informacija/tyrimai-ir-analizes/692>

Annex 3 List of publications used continued

- Equal Opportunities Ombudsperson’s Office: “Homepage”. <https://www.lygybe.lt/lt>
- EU CEDEFOP: “Vocational education and training in Europe”. <https://www.cedefop.europa.eu/en/tools/vet-in-europe/systems/lithuania-2019>
- EU Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (Habitats Directive).
- EU Glossary Item: “Land with high carbon stock”. https://knowledge4policy.ec.europa.eu/glossary-item/land-high-carbon-stock_en
- EU Renewable Energy Directive (RED)II – DIRECTIVE (EU) 2018/ 2001 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL – of 11 December 2018 – on the promotion of the use of energy from renewable sources (europa.eu)
- European Agency for Safety and Health at Work: “National focal points – Lithuania”. <https://osha.europa.eu/en/about-eu-osha/national-focal-points/lithuania>
- European Commission against Racism and Intolerance (ECRI). (2016). ECRI Report on Lithuania (fifth Monitoring Cycle): Adopted on 18 March 2016.
- EU. 2021. Final report on the implementation of the new bioenergy sustainability criteria set out in the revised Renewable Energy Directive (REDIIIBIO – final report). Brussels, Belgium. <https://www.refworld.org/country,,COECRI,,LTU,,584e8ee04,0.html>
- European Commission (2021). The Assessment of Lithuania’s progress in Programmes of Measures during the second planning cycle of the Water Framework Directive. Assessment of Member States’ progress in Programmes of Measures during the second planning cycle of the Water Framework Directive – Publications Office of the EU (europa.eu)
- European Commission. (2017). Factsheet on Undeclared Work – Lithuania. <https://ec.europa.eu/social/ajax/BlobServlet?docId=18169&langId=en>
- European Commission. (2019). The European Green Deal. Brussels, 11.12.2019.
- European Commission. (2020). EU Biodiversity Strategy for 2030: “Bringing nature back into our lives”. Brussels, 20.5.2020.
- European Commission. (2020). Update of the NDC of the European Union and its Member States. https://unfccc.int/sites/default/files/NDC/2022-06/EU_NDC_Submission_December%202020_0.pdf
- European Commission: “Employment, Social Affairs & Inclusion”. <https://ec.europa.eu/social/home.jsp?langId=en>
- European Commission: “The Birds Directive”. https://ec.europa.eu/environment/nature/legislation/birdsdirective/index_en.htm
- European Commission: “The Habitats Directive”. https://ec.europa.eu/environment/nature/legislation/habitatsdirective/index_en.htm
- European Convention on the Protection of the Archaeological Heritage 1985 (ratified 1998). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.90756>
- European Cultural Convention 1954 (ratified 1992). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.31945>
- European Employment Services (EURES): “Labour market information: Lithuania”. https://eures.ec.europa.eu/living-and-working/labour-market-information/labour-market-information-lithuania_en
- European Labour Authority. (2023). Transparent Worker Identification Code. <https://www.ela.europa.eu/sites/default/files/2023-02/Good-practice-fiche-Lithuania-transparent-worker-identification-%28qr%29-code-%282023%29.pdf>
- European Landscape Convention 2000 (ratified 2004). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.189933>
- Forest Cutting Rules (27.01.2010). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.364764>
- General Regulations on Protection Against Fire (27.07.2010). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.379704?jfwid=19p2z99caa>
- Geoportal of Lithuania: “Home”. <https://www.geoportal.lt/geoportal/en/web/en>
- Governance Coordination Centre: “About us”. <https://governance.lt/en/apie-mus/>

Annex 3 List of publications used continued

- Hämäläinen, A, Strengbom, J, Ranius, T. (2019). Low-productivity boreal forests have high conservation value for lichens. *J Appl Ecol*. 2020; 57: 43–54. <https://doi.org/10.1111/1365-2664.13509>
- Hämäläinen, A., Strengbom, J., Ranius, T. (2018). Conservation value of low-productivity forests measured as the amount and diversity of dead wood and saproxylic beetles. *Ecol Appl*, 28: 1011-1019. <https://doi.org/10.1002/eap.1705>
- ILO C144: Tripartite Consultation (International Labour Standards) Convention, 1976. https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100::NO:12100:P12100_ILO_CODE:C144:NO
- ILO: “Homepage”. <http://www.ilo.org/>
- ILO: “Lithuania renews commitment to combat forced labour”. https://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/forced-labour/WCMS_737738/lang--en/index.htm
- ILO: “National Labour Law Profile: Lithuania”. https://www.ilo.org/ifpdial/information-resources/national-labour-law-profiles/WCMS_158913/lang--en/index.htm
- IPCC. (2006). 2006 IPCC Guidelines for National Greenhouse Gas Inventories. <https://www.ipcc-nggip.iges.or.jp/public/2006gl/>
- Kaunas College of Forestry and Environmental Engineering: “Homepage”. <https://www.kmaik.lt/>
- Kędziora, W., Tomusiak, R., Bore, T. (2020). Site index research: a literature review. *Forest Research Papers* 81: 91-98. DOI: 10.2478/frp-2020-0010
- Kēniņa L, Jaunslaviete I, Liepa L, Zute D, Jansons Ā. (2019). Carbon Pools in Old-Growth Scots Pine Stands in Hemiboreal Latvia. *Forests*. 10. <https://doi.org/10.3390/f10100911>
- Labour Code (4.6.2002). <https://e-seimas.lrs.lt/rs/legalact/TAD/TAIS.391384/>
- Law concerning the ratification of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) (22.05.2001). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.136145>
- Law on Ambient Air Protection (12.01.2009). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.356483?jfwid=>
- Law on Corporate Income Tax (20.12.2001). <https://e-seimas.lrs.lt/portal/legalActEditions/lt/TAD/TAIS.157066>
- Law on Employment (21.6.2016). <https://e-seimas.lrs.lt/portal/legalAct/en/TAD/5f0be3809c2011e68adcd1bb2f432d1>
- Law on Environmental Protection (14.05.2015). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/6378f2b0023211e6bf4ee4a6d3cdb874>
- Law on Equal Opportunities for Women and Men (11.05.2017). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/3486ee123cfa11eabd71c05e81f09716>
- Law on Forests (22.11.1994). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.6036/asr>
- Law on Fundamentals of Protection of the Rights of the Child (28.09.2017). <https://www.e-tar.lt/portal/lt/legalAct/5a6c9100adc011e79d87b6f526384a70/asr>
- Law on Genetically Modified Organisms (12.06.2001). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.151558?jfwid=32ocqti2u>
- Law on Health and Safety at Work (16.7.2003). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/3c128c0120eb11e58a4198cd62929b7a?jfwid=j1u6>
- Law on Land (19.05.2016). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/4bf34552ad7211e68987e8320e9a5185?jfwid=>
- Law on Land Reform (25.7.1991). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.2718?jfwid=>
- Law on Plant Protection (19.10.1995). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.21793/asr>
- Law on Protected Areas (11.06.2015). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/cf9f9132b60d11e6a3e9de0fc8d85cd8?jfwid>
- Law on Protection of Immovable Cultural Heritage (22.12.1994). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.15165?jfwid=>

Annex 3 List of publications used continued

- Law on Restoration of Citizens' Rights to Extant Real Property (1.7.1997). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.41505/asr>
- Law on Safety and Health at Work (1.7.2003). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/3c128c0120eb11e58a4198cd62929b7a?jfwid=j1u6>
- Law on Territorial Planning (27.09.2016). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/dde75b13095011e78dacb175b73de379?jfwid>
- Law on the Heat Industry (20.05.2003). <https://e-seimas.lrs.lt/portal/legalActEditions/lt/TAD/TAIS.211524>
- Law on the Protection of Immovable Cultural Properties (11.07.2019). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/30b3a4e0e38011ea869e86e74cfea363?jfwid=bkaxlfhf>
- Law on the Real Property Register (24.09.1996). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.31770?jfwid=>
- Law on the State Labour Inspectorate (14.10. 2003). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.220102/asr>
- Law on Value-Added Tax (05.03.2002). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.163423>
- Law on Waste Management (23.06.2015). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/ecccf681441b11e68f45bcf65e0a17ee?jfwid=32wf8qgf>
- Law on Water (05.07.2000). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.123809?jfwid=92zt7rbw2>
- Law on Wild Flora (15.06.1999). <https://e-seimas.lrs.lt/portal/legalActEditions/lt/TAD/TAIS.83678>
- Lithuanian District Heating Association. (2019). Lithuanian DH sector: recent developments. A presentation by dr. Valdas Lukoševičius on March 20, 2019.
- Lithuanian Federation of Forest and Wood Workers Trade Unions: "Homepage". www.lmpf.lt
- Lithuanian Energy Agency: "Financial support for private legal entities (finansinė parama privatiesiems juridiniams asmenims)". <https://www.ena.lt/fp-privjuridasm/>
- Lithuanian Information Portal: <https://www.geoportal.lt/geoportal/>
- Lithuanian Trade Union Confederation (LPSK): "Homepage". <http://www.lpsk.lt>
- Luyssaert, S., Schulze, E. D., Börner, A., Knohl, A., Hessenmöller, D., Law, B., Ciais, P., Grace, J. (2008). Old-growth forests as global carbon sinks. *Nature*. 455: 213-215. 10.1038/nature07276
- Medaiskis, T., Jankauskiene, D. ASISP country document update 2014: Pensions, health and long-term care, Lithuania. <https://ec.europa.eu/social/BlobServlet?docId=12972&langId=en>
- Milieu Law & Policy Consulting. (2015). Evaluation of the EU Occupational Health and Safety Directives – Country Summary Report for Lithuania. <https://ec.europa.eu/social/BlobServlet?docId=17116&langId=fr>
- Ministry of Culture: "Conservation of historic monuments". <https://www.km.gov.lv/en/conservation-historic-monuments>
- Ministry of Culture: "Council for Digitisation of Lithuanian Cultural Heritage". <https://lrkm.lrv.lt/en/structure-and-contacts/councils-and-commissions/councils-under-the-ministry/council-for-digitisation-of-lithuanian-cultural-heritage>
- Ministry of Culture: "Homepage". <https://lrk.lrv.lt/>
- Ministry of Environment and State Forest Service. (2023). Lithuanian Statistical Yearbook of Forestry 2021.
- Ministry of Environment. (2016). The Forest Owner's Elementary (Miško savininko elementorius). <https://gamtosknyga.lt/wp-content/uploads/2017/10/Misko-savininko-elementorius-2017.pdf?x13947>
- Ministry of Environment. (2020a). Article 17 National Summary Factsheet – Lithuania. Reporting period 2013-2018.

Annex 3 List of publications used continued

- Ministry of Environment. (2020b). Annex I: Article 17 National Summary Factsheet. Lists of habitats and species reported by the Member State with the overall conclusions of conservation status and overall conservation status trend for the reporting period 2007-2012 and 2013-2018.
- Ministry of Environment. (2022). Project preparing the National Forest Agreement. <https://nacionalinismiskusutarimas.lt/wp-content/uploads/2022/06/Nacionalinis-susitarimas-del-misku-ateities.pdf>
- Ministry of Environment: "Homepage". <https://am.lrv.lt/en/>
- Ministry of Social Security and Labour: "Lithuania has committed to the consistent fight against forced labour". <https://socmin.lrv.lt/en/news/lithuania-has-committed-to-the-consistent-fight-against-forced-labour>
- Ministry of Social Security and Labour: "Presentation of the Labour Code". <https://socmin.lrv.lt/en/activities/labour-and-employment/labour-law/presentation-of-the-labour-code>
- Ministry of Social Security and Labour: "Register of collective agreements and procedures for registering collective agreements". <https://socmin.lrv.lt/lt/paslaugos/administracines-paslaugos/kolektyviniu-sutarciu-registras-ir-kolektyviniu-sutarciu-registravimo-tvarka>
- Ministry of Social Security and Labour: "Remuneration for work". <https://socmin.lrv.lt/en/activities/labour-and-employment/labour-law/remuneration-for-work>
- Ministry of Social Security and Labour: "Safety and Health at Work". <https://socmin.lrv.lt/en/activities/labour-and-employment/safety-and-health-at-work>
- Ministry of Social Security and Labour: "Social Insurance Contributions". <https://socmin.lrv.lt/en/activities/social-insurance-1/social-insurance-contributions>
- Ministry of Transport and Communications. (2020). National Energy and Climate Plan 2021-2030. https://energy.ec.europa.eu/system/files/2022-08/lt_final_necp_main_en.pdf
- Molina-Valero, J. A., Camarero, J. J., Álvarez-González, J. G., Cerioni, M., Hevia, A., Sánchez-Salguero, R., Martín-Benito, D., Pérez-Cruzado, C. (2021). Mature forests hold maximum live biomass stocks. *Forest Ecology and Management*. 480. <https://doi.org/10.1016/j.foreco.2020.118635>
- National Audit Office of Lithuania. (2022). Protection of Lithuanian Forestry Resources. <https://www.valstybeskontrole.lt/EN/Product/24091/protection-of-lithuanian-forestry-resources>
- National Forest Agreement: "Homepage". <https://nacionalinismiskusutarimas.lt/>
- National Health Insurance Fund: "Homepage". <https://ligoniukasa.lrv.lt/en/>
- National Land Service: "Homepage". <https://www.nzt.lt/go.php/lt/english>
- National Program on Development of Forest Sector 2012-2020 (Decision of the Government, 23.05.2012, No. 569)
- Naturalit: "About Natura 2000". <https://naturalit.lt/apie-natura-2000/>
- Naturalit: "Homepage". <https://naturalit.lt/en/home/>
- Nature Research Centre & Institute of Botany. (2010). Eb svarbos natūralių buveinių inventorizacijos metodinių dokumentų parengimas ir bandomoji natūralių buveinių inventorizacija. 1 paslaugos sudėtinė dalis: Lietuvoje vykdytų ir vykdomų gamtinių teritorijų inventorizavimo ir kartografavimo sistemų, metodų ir rezultatų pritaikomumo analizės atlikimas. Ataskaita. (Report on the inventorying and mapping of natural habitats in Lithuania).
- Nord-Larsen, T., Vesterdal, L., Bentsen, N. S., Larsen, J. B. (2019). Ecosystem carbon stocks and their temporal resilience in a semi-natural beech-dominated forest. *Forest Ecology and Management*. 447: 67-76. <https://doi.org/10.1016/j.foreco.2019.05.038>
- Occupational Health Centre: "Homepage". <https://www.hi.lt/en/>

Annex 3 List of publications used continued

- Official Statistical Portal. (2023). Forestry and hunting. https://osp.stat.gov.lt/en_GB/miskininkyste-ir-medziokle
- On the approval of the composition of the Tripartite Council of the Republic of Lithuania (Resolution of the Government, 22.06.2022). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/18de0236f2c311ecbfe9c72e552dd5bd?jfwid=19p2z9amtp>
- On the approval of the methodology for setting the rate of main forest felling (Instruction of the Minister of Environment, 02.07.2008). <https://www.e-tar.lt/portal/lt/legalAct/TAR.EA72E37B9B75/asr>
- Order concerning the approval of agricultural and forestry vehicles (Order of the Minister of Agriculture, 14.10.2015). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/0c36cf3072af11e59a1ed226d1cbceb5?jfwid=19p2z99b15>
- Order of the Minister of Environment of the Republic of Lithuania, Director of the Customs Department under the Ministry of Finance and Director of the State Food and Veterinary Service “On Approval of the Rules for Trade in Wildlife” (07.12.2021). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/afc20aa2575c11ec86bdcb0a6d573b32?jfwid=>
- Order on Forest Work Safety Rules (22.11.1996). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.35090>
- PEFC: “PEFC Lithuania”. <https://pefc.org/discover-pefc/our-pefc-members/national-members/pefc-lithuania>
- Procedures for calculating and paying obligatory payments to the state budget for the income received from round wood and standing timber sales in state forests (Decision of the Government, 10.08.2002). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.176230/zLujMFJEot>
- Protection of Minors: “Children and Youth Protection in Lithuania”. <https://www.protection-of-minors.eu/en/country/LT>
- Regulations of Forests Protection against Fires (Decision of the Government, 07.04.1995). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.17363/asr>
- Regulations on Defining the Main Land Use Purpose and Procedures for Application, Evaluation and Decision-Making in Order to Change the Main Land Use Purpose (Decision of the Government, 13.10.2004). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.242993>
- Regulations on Forest Sanitation Protection (Decree of the Minister of Environment 11.04.2007). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.295781/asr>
- Regulations on Occupational Risk Assessment (25.10.2012). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.435935?jfwid>
- Regulations on the Management and Use of Private Forests (24.07.1997). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.41952>
- Resolution on the approval of the procedure for the organization of employment, work and professional training of persons under eighteen years of age, description of the conditions of employment of children (28.6.2017). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/15b820215cd411e7a53b83ca0142260e/asr>
- Restoration of ownership rights to forest land (Decision of the Government, 25.8.1992)
- Rules for selling standing timber in state forests (Decision of the Government, 31.10.2001). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.153151/asr>
- Rules for the Preparation of Forest Management Schemes and Internal Forest Management Projects (01.09.2009). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.282270>
- Sabatini, F. M., Burrascano, S., Keeton, W. S., Levers, C., Lindner, M., Pötzschner, F., Verkerk, P. J., Bauhus, J., Buchwald, E., Chaskovsky, O., Debaive, N., Horváth, F., Garbarino, M., Grigoriadis, N., Lombardi, F., Duarte, I. M., Meyer, P., Midteng, R., Mikac, S., Mikoláš, M., Motta, R., Mozgeris, G., Nunes, L., Panayotov, M., Ódor, P., Ruete, A., Simovski, B., Stillhard, J., Svoboda, M., Szwagrzyk, J., Tikkanen, O.-P., Volosyanchuk, R., Vrska, T., Zlatanov, T., Kuemmerle, T. (2018). Where are Europe’s last primary forests? Diversity and Distributions. 24: 1426–1439. <https://doi.org/10.1111/ddi.12778>
- Seedre, M., Kopáček, J., Janda, P., Bače, R., Svoboda, M. (2015). Carbon pools in a montane old-growth Norway spruce ecosystem in the Bohemian Forest: Effects of stand age and elevation. Forest Ecology and Management. 346:106-113. <https://doi.org/10.1016/j.foreco.2015.02.034>

Annex 3 List of publications used continued

- Seimas of the Republic of Lithuania. (2012). Resolution: Approving the National Forestry Sector Development Programme for 2012–2020.
- Seimas of the Republic of Lithuania. (2021). Resolution: Approving the National Climate Change Management Agenda.
- State Forest Enterprise. (2022). Report on the activities of the State Forest Enterprise for the first half of 2022. https://governance.lt/wp-content/uploads/2018/08/VMU_2022_06.pdf
- State Forest Enterprise: “FSC sertifikavimas”. <https://vmu.lt/veikla/miskininkyste/fsc-sertifikavimas/>
- State Forest Service: “Homepage”. <https://amvmt.lrv.lt/>
- State Forest Service: “Planavimo dokumentai”. <https://amvmt.lrv.lt/lt/administracine-informacija/planavimo-dokumentai>
- State Labour Inspectorate. (2022). 2021 report on the state of occupational safety and health and the implementation of the labour code, laws and regulations on occupational safety and health and industrial relations in enterprises in the Republic of Lithuania. https://www.vdi.lt/PdfUploads/DSS_tendencijos_2017_2021.pdf
- State Labour Inspectorate: “State Labour Inspectorate information in the English language”. <https://www.vdi.lt/Forms/EN.aspx>
- State Labour Inspectorate: “VDI stiprina prevenciją priverstiniam darbui – steigiamos specializuotos grupės”. https://www.vdi.lt/Forms/Tekstas1.aspx?Tekstai_ID=3709
- State Labour Inspectorate: “Žiniasklaidai”. <https://www.vdi.lt/Forms/TemaZiniasklaidai.aspx>
- State Plant Service: “Homepage”. <https://www.vatzum.lt/en>
- State Plant Service: “Plant Protection Products Authorisation Division”. <https://www.vatzum.lt/en/activity/fields-of-activity/plant-protection-products-authorisation/>
- State Program on Waste Prevention (Decree of the Minister of Environment 22.10.2013). <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.458655?jfwid=32wf8x2q>
- State Register Center: “Property and encumbrances”. https://www.registrucentras.lt/ntr/index_en.php
- State Service for Protected Areas: “Homepage”. <https://vstt.lrv.lt/en/>
- State Service for Protected Areas: “The History of evolution”. <https://vstt.lrv.lt/en/about-protected-areas/the-history-of-evolution>
- State Tax Inspectorate database of taxpayers in Lithuania: <https://www.vmi.lt/evmi/en/home>
- Statistical information as well as maps about registered private forest management plans and cutting permissions issued in private forests: <http://www.amvmt.lt:81/mgis/>
- Transparency International. (2022). “Corruption Perceptions Index Lithuania”. <https://www.transparency.org/en/cpi/2022/index/ltu>
- UNESCO World Heritage Convention: “States Parties”. <https://whc.unesco.org/en/statesparties/>
- UNFCCC: “Lithuania”. <https://unfccc.int/node/61103>
- VASAB – Vision, Strategies around the Baltic Sea. (2021). Country Fiche on Terrestrial Spatial Planning. Lithuania. https://vasab.org/wp-content/uploads/2021/08/Lithuania_Country_Fiche_Spatial_Planning_Aug2021.pdf
- VAT Calc: “Lithuania VAT guide 2023”. <https://www.vatcalc.com/lithuania/lithuania-vat-guide/>
- Vilnius Combined Heat and Power Plant: “About the plant”. <https://www.vkj.lt/en/about-us/about-the-plant/129#c-15/t-55>
- Vytautas Magnus University Agriculture Academy: “Faculty of Forest Sciences and Ecology”. <https://zua.vdu.lt/en/faculties/faculty-of-forest-sciences-and-ecology/>
- Varnagirytė-Kabašinskienė, I., Lukminė, D., Mizaras, S., Beniušienė, L. and Armolaitis, L. 2019. Lithuanian forest biomass resources: legal, economic and ecological aspects of their use and potential. *Energy, Sustainability and Society* (2019) 9:41.

Annex 4 List of stakeholders

No.	Organisation	Type of organisation
1	Preferred by Nature (Vilnius)	Certification / Consultation Body
2	State Forest Service under the Ministry of Environment (Kaunas)	Government / State Forests
3	Environmental Protection Department, Ministry of Environment (Vilnius)	Government
4	State Service for Protected Areas under the Ministry of Environment (Vilnius)	State Institution / Nature
5	State Forest Enterprise (Forest management department) (Kaunas)	State Institution / Forests
6	Private Forest Owners Association (Vilnius)	Forest Owners' Organisation
7	Forest and Land Owners Association of Lithuania (Vilnius)	Forest Owners' Organisation
8	Lithuanian Biomass Energy Association LITBIOMA (Vilnius)	Industry organisation
9	Lithuanian Confederation of Renewable Resources (Vilnius)	Industry organisation
10	Forestry Contractors' Association (Vilnius)	Industry organisation
11	UAB Graanul Invest (Alytus)	Industry company
12	UAB Stora Enso Lietuva (Forest) (Alytus)	Industry company
13	Lithuanian Centre of Agricultural and Forestry Sciences / Forest Institute (Kaunas)	Academia / Research
14	Vytautas Magnus University / Academy of Agriculture / Faculty of Forestry and Ecology (Ringaudai)	Education / Training
15	Lithuanian Fund for Nature (Vilnius)	NGO
16	Environmental Coalition (Vilnius)	NGO
17	Lithuanian Federation of Trade Unions of Forest and Forest Industry Workers (Vilnius)	Trade unions

Annex 5 Stakeholder consultation report

Stakeholder consultation report

The draft SBP RRA Revision for Lithuania with a cover letter was sent by email to 17 stakeholders (see Annex 4) on 21 April 2023. The cover letter can be seen below.

Dear Recipient,

Greetings from Indufor Oy in Helsinki, Finland!

Indufor is an international forestry consultancy (www.induforgroup.com). The Sustainable Biomass Program (SBP) appointed Indufor to update SBP's Regional Risk Assessment (RRA) for Lithuania, Version 1.1 which was published in June 2021.

SBP RRA Procedure requires conducting consultation with relevant stakeholders on the draft RRA Update for Lithuania – that Indufor prepared under SBP's guidance- before a revised draft can be prepared. As a valued stakeholder, I am reaching out to you to request your feedback on the draft RRA Update for Lithuania (attached herewith). Information about SBP and the background, purpose and scope of the RRA Update for Lithuania is given below.

May I request you give your feedback on the attached draft SBP RRA Update for Lithuania by May 21, 2023, to sepul.barua@induforgroup.com? If you have any questions, please contact us by e-mail or phone. Thank you for thinking and contributing!

Dr. Sepul Barua, Team Leader and Coordinator, Indufor Oy
sepul.barua@induforgroup.com or

Ms Jurate Zimkiene, Independent Lithuanian Consultant
jurate.chu@gmail.com / +370 656 56149

Annex 5 Stakeholder consultation report continued

Gerbiamas,

Linkėjimai nuo kompanijos "Indufor Oy" Helsinkyje, Suomijoje!

„Indufor“ yra tarptautinė miškininkystės konsultavimo įmonė (www.induforgroup.com). Sertifikavimo organizacija „SBP“ (Tvarios Biomasės Programa, angl. „The Sustainable Biomass Program“) įgalioja „Indufor“ atnaujinti SBP Regioninės Rizikos Vertinimo (RRV) Lietuvai 1.1 versiją, kuri buvo paskelbta 2021 m. birželio mėn.

Vadovaudamasi SBP gairėmis, mūsų įmonė parengė atnaujintą Lietuvos RRV projektą. Šiame etape, SBP procedūros reikalauja konsultuotis su atitinkamomis suinteresuotosiomis šalimis prieš paruošiant peržiūrėtą projekto versiją. Kreipiuosi į Jus kaip į vertingą suinteresuotąją šalį ir prašau jūsų komentarų ar pastabų dėl Lietuvos RRV atnaujinimo projekto (pridedama). Informacija apie SBP ir Lietuvos RRV atnaujinimo pagrindą, tikslus ir apimtis pateikiama žemiau.

Ar galiu paprašyti jūsų pateikti atsiliepimus apie pridėtą SBP RRA atnaujinimo Lietuvai projektą iki 2023 m. gegužės 21 d. adresu sepul.barua@induforgroup.com? Jeigu turėtumėte klausimų, susisiekite su mumis el. paštu arba telefonu. Dėkojame už jūsų pagalbą.

Dr. Sepul Barua, Komandos vadovas ir koordinatorius, Indufor Oy
sepul.barua@induforgroup.com or

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Annex 5 Stakeholder consultation report continued

Sustainable Biomass Program (SBP)

The Sustainable Biomass Program (SBP) is a certification scheme designed for woody biomass used in industrial, large-scale energy production. SBP has developed a certification scheme to provide assurance that woody biomass is sourced both legally and sustainably allowing companies in the biomass sector to demonstrate compliance with regulatory requirements, as a minimum. The SBP certification scheme has been designed by using a risk-based approach. This requires SBP certificate holders to focus their efforts on the indicators of SBP Standard 1 that have been identified to represent a specified risk in their supply base.

Background to SBP RRA update

The SBP system allows two pathways to conduct the risk assessment – either each certification holder develops their assessment (called Supply Base Evaluation – SBE) or a regional risk assessment (RRA) is developed by experts and is required to be used by all certificate holders, removing the burden of each certificate holders to develop their own SBE. In this case, all certificate holders active in the geographic region must design their SBP certification management system based on the approved RRA.

As of March 2023, SBP has approved six RRAs covering the following countries/regions: Latvia, Lithuania, Estonia, Denmark, and British Columbia and Quebec in Canada. There are two other RRAs (i.e. the Province of New Brunswick, Canada, and Portugal) in the pipeline (sbp-cert.org).

All SBP standards (Standards 1–6) have been updated on March 16, 2023, following a comprehensive review process. Like other standards, the criteria and indicators of the SBP Standard 1: Feedstock Compliance Standard is updated to version 2.0 (v2.0) on 16 March 2023.

Indufor Oy is appointed by SBP as the Working Body to update the RRA for Lithuania, Version 1.1 (published in June 2021) following the updated SBP Standards.

Purpose and scope of RRA update for Lithuania

Each SBP RRA is valid for a certain period of time and needs to be updated after the end of that period. The SBP RRA Update for Lithuania updates the RRA for Lithuania, Version 1.1 which was published on 15 June 2021. The updating is done following SBP RRA Procedure Version 1.2 and the SBP Standard 1: Feedstock Compliance Standard, Version 2.0 (March 16, 2023).

Annex 5 Stakeholder consultation report continued

Tvarios Biomasės Programa (SBP)

Tvarios Biomasės Programa (SBP) – tai sertifikavimo schema, skirta medienos biokurui, naudojamai pramoninėje, didelio masto energijos gamyboje. SBP sukūrė sertifikavimo schemą, siekdama užtikrinti, kad medienos biokuras yra tiekiamas teisėtai ir tvariai, o biokuro sektoriaus įmonės gali įrodyti, kad jos laikosi svarbiausių teisės aktų reikalavimų. SBP sertifikavimo schema buvo sukurta naudojant rizikų vertinimu pagrįstą metodą. Remiantis šiuo metodu, SBP sertifikatų turėtojai privalo sutelkti savo pastangas į SBP standarte Nr. 1 išvardintus rodiklius, kurie kelia tam tikrą riziką jų žaliavos tiekimo bazėje.

SBP RRV atnaujinimo pagrindas

SBP sistema leidžia atlikti du rizikos įvertinimo būdus. Pirmas, kai kiekvienas sertifikavimo turėtojas parengia savo rizikos vertinimą (vadinamą Tiekimo bazės vertinimu, angl. Supply Base Evaluation SBE). Antras, kai nuimama našta nuo sertifikuotųjų įmonių ir Regioninį rizikos vertinimą (RRV) parengia ekspertai, tačiau tuomet juo privalo naudotis visi sertifikatų turėtojai. Tokiu atveju, visos sertifikuotos įmonės, veikiančios tame geografiniame regione, turi sukurti savo SBP sertifikavimo valdymo sistemą remdamiesi patvirtintu RRV.

2023 m. kovo mėn. SBP patvirtino šešis RRV šiose šalyse / regionuose: Latvija, Lietuva, Estija, Danija ir Britų Kolumbija bei Kvebekas Kanadoje. Rengiami dar du RRV (t. y. Naujojo Bransviko provincija, Kanada ir Portugalija) (sbp-cert.org)).

Visi SBP standartai (1–6 standartai) po išsamaus peržiūros proceso buvo atnaujinti 2023 m. kovo 16 d. Kaip ir kitų standartų, SBP standarto Nr. 1 „Žaliavų Atitikties Standarto“ kriterijai ir rodikliai 2023 m. kovo 16 d. atnaujinami į 2.0 (v2.0) versiją.

SBP paskyrė „Indufor Oy“ atnaujinti Lietuvos RRV 1.1 versiją (paskelbtą 2021 m. birželio mėn.) pagal atitinkamai atnaujintus SBP standartus.

Lietuvos RRV atnaujinimo paskirtis ir apimtis

Kiekvienas SBP RRV galioja tam tikrą laikotarpį ir turi būti atnaujintas jam pasibaigus. SBP Lietuvos RRV atnaujinimas pakeis RRV 1.1 versiją, kuri buvo paskelbta 2021 m. birželio 15 d. Atnaujinimas atliktas pagal SBP RRV procedūros 1.2 versiją ir SBP standartą Nr. 1 „Žaliavų Atitikties Standartas“ 2.0 versija (2023 m. kovo 16 d.).

A total of nine stakeholders out of 17 initially contacted, responded to the request to provide feedback on the draft and revised draft RRA Revision for Lithuania. This means the response rate was about 53%. Seven stakeholders gave comments and two stakeholders did not give any comments. The stakeholder comments are responded to below.

Annex 5 Stakeholder consultation report continued

Stakeholder	Comment	Response
On Draft RRA revision for Lithuania		
Forest manager	<p><i>Original</i></p> <p>Peržiūrėjau apie 1/3 dokumento, klaidas pažymėjau, pateikiau patikslinimus. Akivaizdu, kad neintegruoti paskutiniai instituciniai pokyčiai, vykę 2022 metais – kai įvyko miškų kontrolės funkcijų perdavimas iš VMT į Aplinkos apsaugos departamentą (AAD). Bendrai dokumentas parengtas solidžiai, tik reikėtų ištaisyti netikslumus.</p> <p>(from Dr Albertas Kasperavičius, Deputy Director of the State Forest Service)</p> <p><i>Google Translation</i></p> <p>I reviewed about 1/3 of the document, noted errors, and made corrections. It is clear that the last institutional changes that took place in 2022 – when the forest control functions were transferred from VMT to the Environmental Protection Department (AAD) – have not been integrated. In general, the document is solidly prepared, only inaccuracies should be corrected.</p> <p>The Ministry of Environment makes the policy related to forest resources while the State Forest Service implements them. The Environmental Protection Department under the Ministry of Environment controls the forestry activities.</p> <p>-----</p> <p>Before 2018, there were 42 State Forest Enterprises in Lithuania. In 2018, all of them were consolidated into one State Forest Enterprise with 26 branches.</p>	<p>The relevant parts of the RRA Update for Lithuania are revised based on this information.</p>
	<p>Indicator 3.2.2</p> <p><i>Original in Lithuanian</i></p> <p>Teisės aktas, kuriuo vadovaujantis skaičiuojama pagrindinio miško kirtimo norma: https://www.e-tar.lt/portal/lt/legalAct/TAR.EA72E37B9B75/asr</p> <p>Dėl neproduktyvių medynų išsaugojimo pasisako metodikos 9 p.:</p> <p>9. Kirtimų norma amžiaus klasių metodu skaičiuojama III ir IV grupių miškams, naudojant OPTINA matematinį modelį (1 priedas). Kirtimų norma II grupės miškams skaičiuojama pagal gamtinę brandą pasiekusių bei stichinių arba biotinių veiksnių sudarkytų ir blogos sanitarinės būklės nebrandžių medynų kiekį.</p>	<p>Indicator 3.2.2 is revised based on this information.</p>

Annex 5 Stakeholder consultation report continued

Stakeholder	Comment	Response
Forest manager continued	<p>Į apskaičiavimus neįtraukiami brandūs Va ir žemesnio boniteto spygliuočių bei V ir žemesnio boniteto lapuočių medynai, taip pat medynai, kuriuose yra paveldo objektai, inventorizuotos kertinės miško buveinės (valstybiniuose miškuose), medynai, esantys saugomų paukščių lizdavičių apsaugos zonose, miškų mokslinio tyrimo ir mokymo bei selekcinės sėklininkystės objektams priskirtuose miškų plotuose.</p> <p><i>Microsoft Outlook 365 translation</i> The legal act on the basis of which the rate of main logging is calculated: https://www.e-tar.lt/portal/lt/legalAct/TAR.EA72E37B9B75/asr On the preservation of unproductive stands, p. 9 of the methodology speaks out: 9. The rate of felling by the age-class method is calculated for forests of groups III and IV using the OPTINA mathematical model (Appendix 1). The rate of felling for group II forests is calculated on the basis of the number of immature stands that have reached natural maturity and are damaged by natural or biotic factors and are in poor sanitary condition. Mature stands of Va and lower bonite conifers and deciduous stands of V and lower bonite are excluded from the calculations, as well as stands containing heritage objects, inventoried core forest habitats (state forests), stands located in the protection zones of nesting sites for protected birds, forest areas designated as objects for the scientific research and training of forests and selective seed production.</p>	
	<p>Indicator 3.3.1 <i>Original in Lithuanian</i> Apvalios medienos kainos (V) VMU) – Miškų ūkio statistikos leidinio lentelė NR. 9.5: https://amvmt.lrv.lt/uploads/amvmt/documents/files/Statistika/MiskuStatistika/2021/09%20Misku%20ukio%20statistika%202021_m.pdf Ankstesnių metų – kituose ankstesniuose statistikos leidiniuose (VMT svetainėje). <i>Microsoft Outlook 365 translation</i> Round timber prices (SE VMU) – Table no. 9.5: https://amvmt.lrv.lt/uploads/amvmt/documents/files/Statistika/MiskuStatistika/2021/09%20Misku%20ukio%20statistika%202021_m.pdf. Previous years – in other previous statistical publications (vmt website).</p>	<p>Analysis of the price data is included in indicator 3.3.1.</p>
	<p>Indicators 4.1.8 and 4.1.10 State Forest Enterprise agrees with the Specified risk classification given to these indicators.</p>	<p>Noted.</p>

Annex 5 Stakeholder consultation report continued

Stakeholder	Comment	Response
<p>Certification Body</p>	<p>Please find below the comments related to 2 indicators. For these indicators we propose to change the specific risk to low risk.</p> <p><i>3.2.2. Primary feedstock shall not be sourced from forest areas where site productivity is low and, according to local definitions or norms, the areas are classified as low-productive or difficult to regenerate.</i></p> <p>The forest management practice in Lithuania is based on the comprehensive Forest management plan which sets up the priorities, goals, and measures for forest management. Among the main goals of forest management in Lithuania every Forest management plan mentions the maintenance and increase of forest productivity, therefore the forest management practice is designed in a way to make sure the productivity of forest is maintained, increased or low productive forests are protected.</p> <p>It is not correct to state that in Lithuania there is no definition that would classify forests according to their productivity level. Trees of the same species and age, growing in different habitats or sites, reach different heights, volumes, and productivity. Therefore, to describe the conditions and productivity of the forest sites, they are evaluated by forest index (productivity level). Seven forest indexes related to productivity is designed: 1A, 1, 2, 3, 4, 5 and 5A. The best growing stands reach 1A index, while the worst – 5A index. In addition, every forest site is evaluated by annual increment and forest stand volume, which also easily allows to classify forest according to their productivity level. These data available for all forest stands in Lithuania and there is the monitoring data and statistics on how the data related to productivity is changing over the decades. The forest statistics in Lithuania shows the average forest stand volume in Lithuania over the last years doesn't decrease.</p> <p>Also, it should be mentioned that the point of this indicator is related to problem of making sure the low productive forest is regenerated. It should be well noted that Lithuanian legislation is very strict on forest regeneration and obliged to regenerate every cut forest stand (including low productive) within 3 years and it is strictly controlled by State Forest Service, which also collects data on forest regeneration. In addition, the national legislation on reforestation is designed in such a way, which ensure that regenerated forest is of the same (or better) condition and productivity level.</p>	<p>Indicator 3.2.2 is revised based on the information.</p>

Annex 5 Stakeholder consultation report continued

Stakeholder	Comment	Response
Certification Body continued	<p>It is also should be noted that the substantial part of low productive forests (such a swamps, etc.) have certain protection regime (included in the protected areas network or representative areas network, etc.)</p> <p>Considering the aforementioned, there is no risk, that low productive forests in Lithuania could be damaged, not regenerated or used in non-sustainable way.</p> <p><i>4.1.8 Training shall be provided for all workers to allow them to implement the conditions set out in all elements of the SBP standards relevant to their responsibilities.</i></p> <p>In the analyses of this indicator there is no data, information, justification or at least any hint related to problems on training provided to workers. The analysis describes well the Lithuanian system of training as well as the level of enforcement and monitoring. Therefore, the specified risk should not be based on assumptions and fears as only positive description is provided. The current description of analyses and enforcement well enough to justify the low risk for this indicator.</p>	<p>The SBP indicator requires training on ALL elements of SBP standards. At the national or regional level, there is no evidence that training covers ALL the elements of SBP Standards. Therefore, the risk is specified, regardless of the overall quality of the education and training.</p>
Trade Association	<p>Our concern is that essential number of the new indicators are added or revised in the current SBP Standard 1 (v2) without proper justification and necessity [in comparison to SBP Standard 1 (v1.0) that was used to prepare the RRA Lithuania in 2021]. In particular we think, that Assigned risk classes for the following indicators should be revised from specified risk to low risk (Table 5.1 of draft Report, pages 9-10).</p> <p>The indicators:</p> <ul style="list-style-type: none"> 2.1.3 – 29 p. 2.2.2. – 32 p. 3.2.2. – 49 p. 3.2.3. – 50 p. 3.3.1. – 53 p. 4.1.8. – 64 p. 4.1.10. – 66 p. 	<p>Indicators 2.13, 2.2.2 and 3.2.3 are assessed to be specified risks because not all Natura 2000 sites in Lithuania are protected and harvesting is allowed in the habitats of EU importance. Indicator 3.2.2 is a specified risk because harvesting can be done in forests on low site classes. Indicator 3.3.1 is now assessed to be low risk as the market seems to regulate the cascading in Lithuania.</p> <p>The SBP indicator requires training on ALL elements of SBP standards. Although training is good there is no guarantee that the letter of the indicator is complied with. Thus it remains a specified risk. Concerning Indicator 4.10, the risk to safety at work is classified as specified due to the relatively high number of accidents in the forest sector (4th in the EU).</p>

Annex 5 Stakeholder consultation report continued

Stakeholder	Comment	Response
Trade Association continued	<p>Very big concern regarding major level of update for Principle 2: Feedstock sourcing does not harm the environment (Table 3.2):</p> <p>For Criterion 2.1: does the adding the areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base will not eliminate such territories from use at all? We have rich biodiversity in our forests, but that was reached by sustainable forest management practices.</p>	<p>It does not necessarily mean that such territories cannot be used at all. It means that HCV objects need to be protected with necessary measures while managing territories.</p>
	<p>For Criterion 2.2: in particular 2.2.1: Feedstock shall not be sourced from land that had one of the following statuses in January 2008 and no longer has that status due to land conversion: a. Forests b. Wetlands c. Peatlands d. Highly biodiverse grasslands. What about ongoing infrastructure projects? Afforestation of abandoned agriculture land (which can be at that time grassland and was no restrictions to do afforestation, or natural regeneration of forest take place?) etc.</p>	<p>All these issues are considered when carrying out the necessary analysis for this indicator.</p>
	<p>2.2.4: Where the removal of harvest forest residues and / or stumps occurs, this shall not lead to irreversible negative impacts to the ecosystem. How will it be measured?</p>	<p>There are many different ways to measure the impacts such as in terms of biodiversity index, soil quality and supply of ecosystem services. How impact is measured depends on the area concerned. In Lithuania, all these indicators appear to be used for assessing the impacts of forest residue removal. However, it has to be noted that such impact assessment is done mainly for the scientific purposes covering particular forest stands not for all forests of the country (see, e.g. Varnagirytė-Kabašinskienė et al. 2019).</p>
	<p>Also for Principle 3, in particular – Criterion 3.2:</p> <p><i>3.2.3: Primary 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).</i></p> <p>Does adding the areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base will not eliminate such territories from use at all? We have rich biodiversity in our forests, but that was reached by sustainable forest management practices.</p>	<p>The indicator requires that feedstock from HCV areas is not sourced at all.</p>

Annex 5 Stakeholder consultation report continued

Stakeholder	Comment	Response
Environmental NGO	<p>Indicator 2.1.3 Not all Natura 2000 sites in Lithuania are protected. Natura 2000 sites located in the private forests can be harvested. There is a temporary restriction put in place on harvesting Natura 2000 sites located in state forests.</p>	The relevant part of the analysis is revised accordingly.
	<p>Indicator 2.2.3 Harvesting is usually done during winter. However, as the winters are getting milder in Lithuania as in many other parts of the world, harvesting machineries disturb soil more.</p>	The relevant part of the analysis is revised accordingly.
	<p>Indicator 4.1.9 When the forest management plan for the state forests is prepared, communities are usually not involved. Therefore, often the community members are surprised by the clearcutting in state forests adjacent to their property. Also forests with high NTFP values can be harvested.</p>	This is highlighted in the analysis now.
Trade Association	Are trees outside forests included in this RRA update?	Trees outside forests are outside the scope of this RRA. This is explained in Section 2.2.
	<p>Indicator 2.1.3 Adequate compensation is needed for protecting the habitats of EU importance located in private forests. Some such compensation is provided under the Common Agricultural Policy in Lithuania. However, it is always debatable if the compensation is enough to persuade the private forests owners to protect such habitats.</p>	The compensation issue is highlighted in the analysis of indicators 2.1.3 as well as 2.1.1 and 2.1.2.
	<p>Indicator 3.2.2 Productivity also depends on how forests on a particular site are managed. Sometimes low productive sites need to be harvested to enhance the growth.</p>	The analysis in indicator 3.2.2 is revised based on the information.

Annex 5 Stakeholder consultation report continued

Stakeholder	Comment	Response
Trade Association continued	<p>Indicators 3.3.1</p> <p>Before the war in Ukraine, Lithuania imported about 1.5 million m³ of wood chips annually from Belarus. As the import from Belarus has completely stopped now, the shortfall in supply is mostly met by harvesting trees outside forests. Forest harvesting for sourcing biomass feedstock only has not increased. However, as two big bioenergy players – with a combined wood consumption capacity of 1 million m³ per year – are entering Lithuanian market, it remains to be seen if forest harvesting for biomass feedstock sourcing as well as energy wood price increase in the future.</p>	The analysis in indicator 3.3.1 is revised based on the information.
	<p>Indicator 4.1.8</p> <p>Because of outward migration, there is a shortage of labour – both skilled and unskilled – in rural areas of Lithuania where forestry activities mostly take place.</p>	The SBP indicator requires training on ALL elements of SBP standards. Although training is good there is no guarantee that the letter of the indicator is complied with. Thus, it remains a specified risk.

Stakeholder	Comment	Response
On revised Draft RRA update		
Government department	We have reviewed the document you submitted. We have no major comments for such detailed study. Thanks for your work and sharing!	Noted with thanks.

Annex 6 REDII Level A risk assessment – Lithuania

Sustainable harvesting criteria 29(6)

The country in which forest biomass was harvested has national or sub-national laws applicable in the area of harvest as well as enforcement and monitoring systems in place ensuring:

(i) The legality of harvesting operations

Step 1: Identification of applicable laws

<i>Have the applicable law(s) been identified?</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No, Level B route is required
<i>List of applicable law(s)</i>	<ul style="list-style-type: none"> – Law on Forests (1994) – Forest Cutting Rules (2010)
<i>Sources</i>	<ul style="list-style-type: none"> – Law on Forests (1994) – https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.6036/asr – Forest Cutting Rules (27.01.2010). https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.364764

Step 2: Description of enforcement and monitoring

<i>Description of the practical implementation of the law(s)</i>	The Environmental Protection Department under the Ministry of Environment enforces the Law on Forests and its subsequent regulations.
<i>Sources</i>	Websites and interviews with responsible officials of the Environmental Protection Department.
<i>Is the enforcement and monitoring ensured for the identified law(s)?</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No, Level B route is required

Step 3: Evaluation of the effectiveness of the legal framework on the legality of timber harvesting

<i>Evaluation of the practical implementation of the law(s) and explanation for the evaluation</i>	Regular monitoring of the enforcement is conducted and reported by the Environmental Protection Department.
<i>Sources</i>	Websites and interviews with responsible officials of the Environmental Protection Department as well as the State Forest Service.
<i>Is legal framework effective?</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No, Level B route is required

Annex 6 REDII Level A risk assessment – Lithuania continued

(ii) Forest regeneration of harvested areas

Step 1: Identification of applicable laws

<i>Have the applicable law(s) been identified?</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No, Level B route is required
<i>List of applicable law(s)</i>	– Law on Forests (1994)
<i>Sources</i>	– Law on Forests (1994) – https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.6036/asr

Step 2: Description of enforcement and monitoring

<i>Description of the practical implementation of the law(s)</i>	The Environmental Protection Department under the Ministry of Environment enforces the Law on Forests and its subsequent regulations.
<i>Sources</i>	Websites and interviews with responsible officials of the Environmental Protection Department.
<i>Is the enforcement and monitoring ensured for the identified law(s)?</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No, Level B route is required

Step 3: Evaluation of the effectiveness of the legal framework on the legality of timber harvesting

<i>Evaluation of the practical implementation of the law(s) and explanation for the evaluation</i>	Regular monitoring of the enforcement is conducted and reported by the Environmental Protection Department.
<i>Sources</i>	Websites and interviews with responsible officials of the Environmental Protection Department as well as the State Forest Service.
<i>Is legal framework effective?</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No, Level B route is required

(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands and peatlands, are protected unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes

Step 1: Identification of applicable laws

<i>Have the applicable law(s) been identified?</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No, Level B route is required
<i>List of applicable law(s)</i>	– Law on Forests (1994) – Law on Protected Areas (2015)

Annex 6 REDII Level A risk assessment – Lithuania continued

<i>Sources</i>	<ul style="list-style-type: none"> – Law on Forests (1994) – https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.6036/asr – Law on Protected Areas (2015) – https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/cf9f9132b60d11e6a3e9de0fc8d85cd8?jfwid
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Step 2: Description of enforcement and monitoring

<i>Description of the practical implementation of the law(s)</i>	The Environmental Protection Department enforces the Law on Forests and its subsequent regulations while the State Service for Protected Areas enforces the Law on Protected Areas.
<i>Sources</i>	Websites and interviews with responsible officials of the Environmental Protection Department and State Service for Protected Areas.
<i>Is the enforcement and monitoring ensured for the identified law(s)?</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No, Level B route is required

Step 3: Evaluation of the effectiveness of the legal framework on the legality of timber harvesting

<i>Evaluation of the practical implementation of the law(s) and explanation for the evaluation</i>	Regular monitoring of the enforcement is conducted and reported by the concerned agencies.
<i>Sources</i>	Websites and interviews with responsible officials of the Environmental Protection Department and State Service for Protected Areas.
<i>Is legal framework effective?</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No, Level B route is required

(iv) That harvesting is carried out considering the maintenance of soil quality and biodiversity with the aim of minimising negative impacts

Step 1: Identification of applicable laws

<i>Have the applicable law(s) been identified?</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No, Level B route is required
<i>List of applicable law(s)</i>	<ul style="list-style-type: none"> – Law on Forests (1994) – Law on Protected Areas (2015)
<i>Sources</i>	<ul style="list-style-type: none"> – Law on Forests (1994) – https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.6036/asr – Law on Protected Areas (2015) – https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/cf9f9132b60d11e6a3e9de0fc8d85cd8?jfwid

Annex 6 REDII Level A risk assessment – Lithuania continued

Step 2: Description of enforcement and monitoring

<i>Description of the practical implementation of the law(s)</i>	The Environmental Protection Department enforces the Law on Forests and its subsequent regulations while the State Service for Protected Areas enforces the Law on Protected Areas.
<i>Sources</i>	Websites and interviews with responsible officials of the Environmental Protection Department and State Service for Protected Areas.
<i>Is the enforcement and monitoring ensured for the identified law(s)?</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No, Level B route is required

Step 3: Evaluation of the effectiveness of the legal framework on the legality of timber harvesting

<i>Evaluation of the practical implementation of the law(s) and explanation for the evaluation</i>	Regular monitoring of the enforcement is conducted and reported by the concerned agencies.
<i>Sources</i>	Websites and interviews with responsible officials of the Environmental Protection Department and State Service for Protected Areas.
<i>Is legal framework effective?</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No, Level B route is required

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

Step 1: Identification of applicable laws

<i>Have the applicable law(s) been identified?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No, Level B route is required There is no legislation in Lithuania for fulfilling this requirement. Nevertheless, the forest harvesting level in Lithuania remains far below annual growth and thus standing stock is growing. According to the Ministry of Environment and State Forest Service (2023), the harvesting level is about 55% on average of the annual allowable cut (AAC) of 10-11 million m ³ . Given that AAC is set below the annual increment in forest land (20 million m ³ in 2021), growing stock in the country has been increasing in the past decades. This means the current harvesting levels do not compromise the long-term production capacity and carbon stock.
<i>List of applicable law(s)</i>	Not applicable
<i>Sources</i>	– Ministry of Environment and State Forest Service. (2023). Lithuanian Statistical Yearbook of Forestry 2021. Vilnius.

Annex 6 REDII Level A risk assessment – Lithuania continued

Step 2: Description of enforcement and monitoring

<i>Description of the practical implementation of the law(s)</i>	Not applicable
<i>Sources</i>	Not applicable
<i>Is the enforcement and monitoring ensured for the identified law(s)?</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Level B route is required

Step 3: Evaluation of the effectiveness of the legal framework on the legality of timber harvesting

<i>Evaluation of the practical implementation of the law(s) and explanation for the evaluation</i>	Not applicable
<i>Sources</i>	Not applicable
<i>Is legal framework effective?</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Level B route is required

LULUCF criteria 29(7)

<i>Paris Agreement ratified?</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>Submission of a relevant NDC</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>Sources</i>	<ul style="list-style-type: none"> – Paris Agreement: UNFCCC’s party information about Lithuania: https://unfccc.int/node/61103 – NDC: European Commission. (2020). Update of the NDC of the European Union and its Member States. https://unfccc.int/sites/default/files/NDC/2022-06/EU_NDC_Submission_December%202020_0.pdf
<i>Brief description of how agriculture, forestry and land use are accounted for in NDC</i>	<p>European Commission (2020):</p> <p>“Accounting for emissions and removals from LULUCF follows specific rules depending on the land accounting category in accordance with Regulation (EU) 2018/841. Afforested Land and Deforested Land use baseline zero (gross-net accounting). Managed Grassland, Managed Cropland and Managed Wetland use as baseline the average emissions between 2005 and 2009 (net-net accounting). Managed Forest Land uses as baseline a Forest Reference Level based on continuation of Forest Management Practices between 2000 and 2009 and taking into account the age-class structure of forests, projected through the compliance period. The mere presence of carbon stocks is excluded from accounting.”</p>

Annex 6 REDII Level A risk assessment – Lithuania continued

OR (this option below must be used if the previous point about NDC is not satisfied)

The origin country has national or sub-national laws in place, in accordance with Article 5 of the Paris Agreement, applicable in the area of harvest, to conserve and enhance carbon stocks and sinks, and providing evidence that reported LULUCF-sector emissions do not exceed removals.

Step 1: Identification of applicable laws

<i>Have the applicable law(s) been identified?</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Level B route is required
<i>List of applicable law(s)</i>	
<i>Sources</i>	

Step 2: Description of enforcement and monitoring

<i>Description of the practical implementation of the law(s)</i>	
<i>Sources</i>	
<i>Is the enforcement and monitoring ensured for the identified law(s)?</i>	

Step 3: Evaluation of the effectiveness of the legal framework on the legality of timber harvesting

<i>Evaluation of the practical implementation of the law(s) and explanation for the evaluation</i>	
<i>Sources</i>	
<i>Is legal framework effective?</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Level B route is required