

Supply Base Report Template for Biomass Producers

Westervelt Pellets I, LLC

www.sbp-cert.org



Completed in accordance with the Supply Base Report Template Version 1.3

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

Document history

Version 1.0: published 26 March 2015

Version 1.1 published 22 February 2016

Version 1.2 published 23 June 2016

Version 1.3 published 14 January 2019

© Copyright The Sustainable Biomass Program Limited 2019

Contents

1	Overview.....	1
2	Description of the Supply Base	2
2.1	General description	2
2.2	Actions taken to promote certification amongst feedstock supplier	2
2.3	Final harvest sampling programme	4
2.4	Flow diagram of feedstock inputs showing feedstock type [optional]	4
2.5	Quantification of the Supply Base	6
3	Requirement for a Supply Base Evaluation.....	8
4	Supply Base Evaluation.....	8
4.1	Scope	8
4.2	Justification.....	8
4.3	Results of Risk Assessment.....	8
4.4	Results of Supplier Verification Programme	8
4.5	Conclusion.....	9
5	Supply Base Evaluation Process.....	9
6	Stakeholder Consultation.....	11
6.1	Response to stakeholder comments	11
7	Overview of Initial Assessment of Risk	13
8	Supplier Verification Programme	15
8.1	Description of the Supplier Verification Programme	15
8.2	Site visits	15
8.3	Conclusions from the Supplier Verification Programme.....	15
9	Mitigation Measures	15
9.1	Mitigation measures	15
9.2	Monitoring and outcomes	22
10	Detailed Findings for Indicators	22
11	Review of Report	23
11.1	Peer review.....	23
11.2	Public or additional reviews.....	23
12	Approval of Report.....	23

13	Updates	25
13.1	Significant changes in the Supply Base	25
13.2	Effectiveness of previous mitigation measures	25
13.3	New risk ratings and mitigation measures.....	25
13.4	Actual figures for feedstock over the previous 12 months	25
13.5	Projected figures for feedstock over the next 12 months	27

1 Overview

Producer name: Westervelt Pellets I, LLC
 Producer location: 6777 Highway 17 South, Aliceville, AL 35442 (production)
 Geographic position: Latitude: 33° 4'24.28" N, Longitude: 88° 14'30.37" W
 Primary contact: Joseph Aquino
 8545 Willow Cale Road, Prince George, BC V2N 6Z9
 (P) 250-562-5562
 (F) 250-562-5584
 joseph.aquino@pinnaclepellet.com
 Company website: <http://www.westerveltenergy.com>
 Date report finalised: 08/March/2019
 Close of last CB audit: Scope Expansion Audit: 22/June/2018 Report Date
 Name of CB: SCS Global Services
 Translations from English: N/A
 SBP Standard(s) used: Standard #1 Version 1.0 March 2015
 Standard #2 Version 1.0 March 2015
 Standard #4 Version 1.0 March 2015
 Standard #5 Version 1.0 March 2015
 Weblink to Standard(s) used: <http://www.sbp-cert.org.org/documents>
 SBP Endorsed Regional Risk Assessment: Not applicable
 Weblink to SBE on Company website: <http://www.westerveltenergy.com/sustainability>

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

2 Description of the Supply Base

2.1 General description

Location

The wood pellet production facility (BP) is located in the Southeast U.S. in Pickens County near Aliceville, Alabama. The facility is approximately ten miles from the Mississippi state line and is adjacent to the Tennessee-Tombigbee Waterway in an economically depressed rural area where forestry and agriculture (e.g. crops, cattle) are prevalent and are the primary sources of income. Much of the forest land in this area is privately owned. Known as the Black Belt Prairie Region, the area is characterized by weathered rolling plains containing various hardwood and mixed hardwood/pine forests.

Supply Base

The supply base area for secondary feedstock includes Alabama, Mississippi, Georgia, South Carolina, North Carolina, Tennessee, Arkansas, and Louisiana in addition to certain counties in Florida, Texas, and Missouri. The origin of primary softwood feedstock is limited to Alabama and Mississippi mainly due to haul distance constraints. A supply base map is attached as Exhibit "A" and a listing of individual states, counties/parishes is available upon request. The majority of feedstock is generated within approximately 150 miles of the plant; however, the supply base area includes the supply basins for sub-suppliers.

BP¹ purchases secondary residuals from Westervelt's sawmill and from third-party generators of residual materials. Primary feedstock is sourced directly from Westervelt owned or managed lands, private (family & institutional) landowners, and a de minimis amount from state lands. A gradual increase in the availability of residual material is underway throughout the region and coincides with increased housing starts.

Westervelt's raw material sourcing activity for pellet production is similar to other industries in the region, although on a smaller scale. The most notable changes include new and/or expanded capacity sawmills in the Southeast U.S. and the expansion of existing wood processing facilities, all of which result in increased secondary residual supply. The BP provides an outlet for feed stocks that would otherwise be difficult to utilize in the supply base area.

¹ Westervelt Pellets I, LLC, a joint venture between The Westervelt Company and Pinnacle Renewable Energy, LLC, is the SBP certificate holder (Biomass Producer) and the production location is Aliceville, Alabama. Westervelt Lumber is a saw mill located in Moundville, Alabama which is wholly owned by The Westervelt Company and generates secondary residues which can be used as feedstock by the BP. Westervelt Forest Resources is wholly owned by The Westervelt Company and owns/controls forest lands in Mississippi, Alabama, Georgia, South Carolina, and Virginia. Thinnings from company forests can be used as feedstock at the BP facility.

BP utilizes secondary residues from softwood and hardwood species in addition to round wood softwood. Secondary residues include sawmill shavings, sawdust, and chips while round wood includes tops, limbs, non-merchantable wood from final harvest tracts, and forest thinnings. Although the primary input is secondary residues, the plant has the ability to utilize round wood. The facility does not utilize saw logs nor does it use any construction, demolition, treated, or post-consumer derived feedstock. When round wood is sourced, residue bark generated on-site is utilized as furnace fuel for the dryer and is supplemented by external bark purchases as needed. External bark is sourced from sawmills and chip mills from hardwood and softwood species.

Protected Species

BP does not utilize feedstock from any Convention on International Trade in Endangered Species of Wild Flora and Fauna ("CITES") listed species. The International Union for Conservation of Nature™ ("IUCN") identifies Longleaf Pine (*Pinus palustris*) as endangered and BP notes the presence of this species in the supply area. BP is not opposed to the use of Longleaf pine provided the land from which the fiber originates is ultimately returned to Longleaf or the species which was present prior to the planting of Longleaf, and supports the mission of the Longleaf Alliance in encouraging markets for the sustainable consumption of this species in order to perpetuate its existence. For further information, refer to Westervelt Pellets I, LLC Statement on Longleaf Pine dated February 1, 2019.

Harvest & Delivery

For primary wood BP utilizes contract logging crews, many of which work primarily for the company. These crews are responsible for harvesting and transportation of raw material to the facility, all of which is delivered by truck. Secondary residuals are delivered by truck by the suppliers of those materials.

Sustainability

The Westervelt Company, a BP joint venture partner, is a large landowner in the region; however, only a portion of company wood is utilized at the facility and the remainder is purchased from third parties. Company owned wood originates from forests certified to SFI and/or FSC while only a portion of third party forests carry some type of forest level certification.

At the BP facility, approximately 20%-39% of feed stock inputs are from Certified Forests recognized by SBP as compliant feed stock; 0%-19% of sawdust was from a certified forest; 0%-39% of sawmill residues (excluding sawdust) were from a certified forest; 100% of all feed stock inputs meet requirements for controlled wood; 100% of all round wood sourced meets SFI Fiber Sourcing requirements; 0% of inputs were from non-compliant feed stock; 0% of inputs were primary feed stock from a primary forest; 0% of inputs were from post-consumer tertiary wood; 0-19% of inputs were from pre-consumer tertiary residue wood.²

Existing BP and Westervelt certifications applicable to the areas within the scope of the Supply Base Evaluation and Risk Assessment include: PEFC ST 2002:2013 Chain of Custody Forest Based Products; FSC Mixed and FSC Controlled Wood Chain of Custody and Fiber Sourcing (SFI 2015-2019); SFI Chain of Custody Standard and Controlled Wood. FSC-US Forest Management Standard (v1.0) and Sustainable Forest Initiative Forest Management apply to certain Westervelt owned lands in the supply base.³

² The figures in this paragraph were current as of the last audit and have not been updated for the April 2019 surveillance audit.

³ Applies to certain Westervelt owned lands in the region and not to third party-owned lands.

2.2 Actions taken to promote certification amongst feedstock supplier

All Westervelt forest management holdings within Alabama are dual FSC and SFI Certified by an independent and accredited Certification Body. The SFI Fiber Sourcing Standard requires Westervelt to promote forest management certification across its wood and fiber supply base. Formal correspondence is sent to direct purchased stumpage landowners urging them to pursue forest certification on their lands. Additional correspondence is sent to indirect and secondary fiber producers urging them to promote forest management certification with landowners from whom they source.

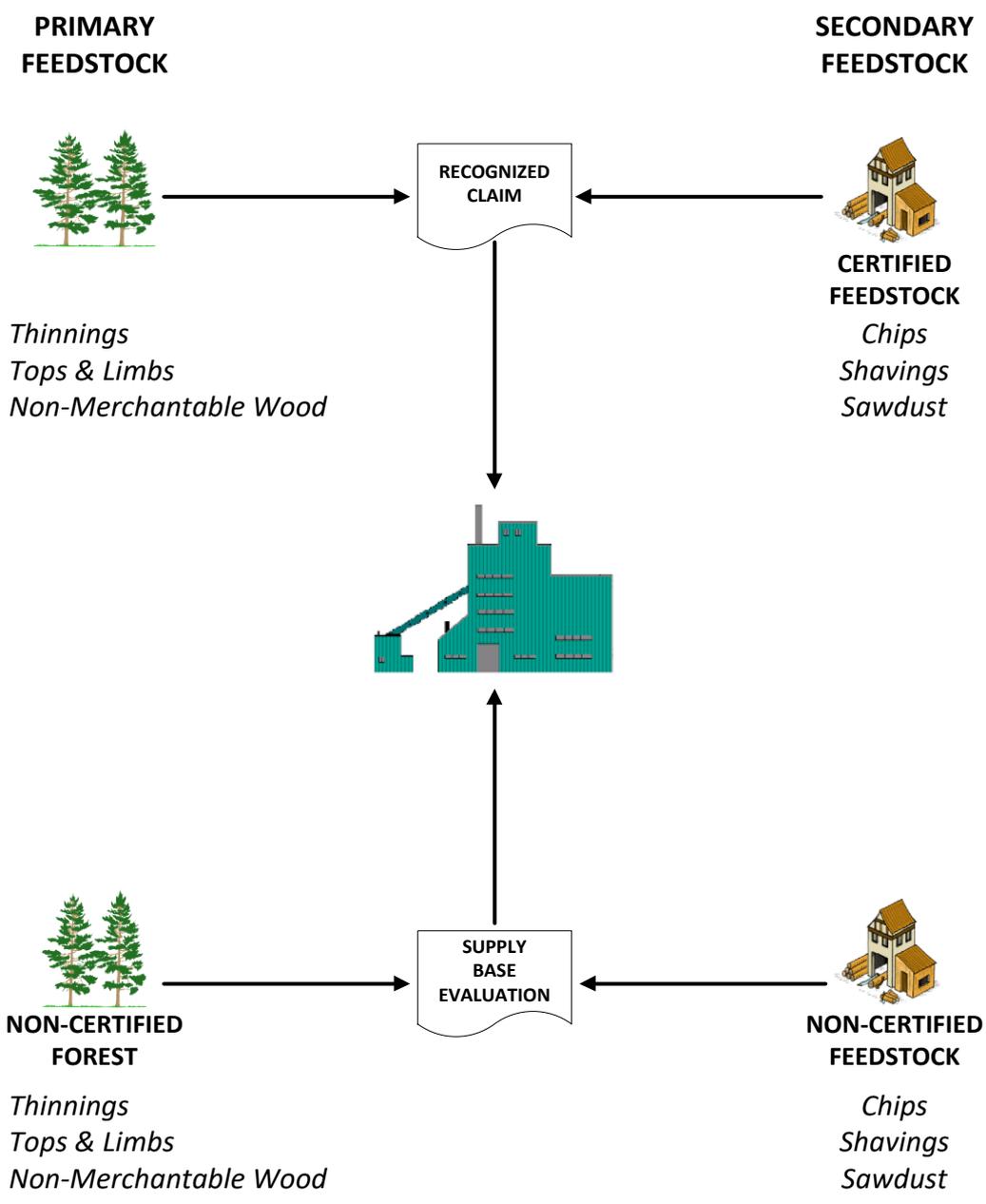
Westervelt is an active member of SFI Implementation Committees which promote forest certification and provide technical information to landowners addressing water quality BMPs, reforestation, visual quality protection, efficient utilization, protection of wildlife and biodiversity, control of invasive species and the identification and protection of forests of exceptional conservation value.

2.3 Final harvest sampling programme

The expected rotation length for round wood softwood in BP's catchment is <40 years which is below the threshold required by the Standard for a final harvest sampling program.

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

BP utilizes softwood round wood and softwood and hardwood secondary residuals. Round wood originates from thinnings, forest residuals (low grade, storm salvage, tops and branches), and final harvest tracts. Secondary residuals in the form of chips, shavings, and sawdust originate from sawmills and other forest products manufacturers. BP does not utilize any saw logs or construction, demolition or post-consumer derived feedstock.



2.5 Quantification of the Supply Base

Supply Base⁴

a. Supply Base Area:

183,951,715

 (ac)

74,442,684

 (ha) (total including all forest types)

b. Tenure by type:

- Private	151,235,223	(ac)	61,202,777	(ha)	85.0	(%)	<i>estimated</i>
- Public	26,716,492	(ac)	10,811,790	(ha)	15.0	(%)	<i>estimated</i>
- Community Concession	-	(ac)	-	(ha)		(%)	<i>de minimis</i>

c. Forest by Type:

183,951,715

 (ac)

74,442,684

 (ha) Temperate

d. Forest Management by Type:

- Plantation	44,471,887	(ac)	17,997,150	(ha)		
- Managed Natural	125,531,845	(ac)	50,800,980	(ha)		<i>estimated</i>
- Natural	13,947,983	(ac)	5,644,553	(ha)		<i>estimated at 10% of Managed Natural</i>

e. Certified Forest by Scheme:

	ATFS (ac)	ATFS (ha)	SFI (ac)	SFI (ha)	FSC (ac)	FSC (ha)
- Alabama	2,762,304	1,117,866	2,944,878	1,191,751	670,919	271,512
- Mississippi	1,320,647	534,447	2,104,972	851,853	250,868	101,523
- Louisiana	1,052,129	425,782	2,962,742	1,198,980	619,974	250,895
- Arkansas	559,518	226,429	3,199,995	1,294,993	1,356,171	548,823
- Tennessee	340,879	137,949	475,216	192,313	100,436	40,645
- North Carolina	406,418	164,472	1,097,424	444,112	190,974	77,285
- South Carolina	1,112,169	450,079	1,126,774	455,990	327,299	132,453
- Georgia	1,924,197	778,696	2,419,141	978,992	81,601	33,023
- Florida	1,082,355	438,014	1,879,588	760,643	126,404	51,154
- Texas	788,625	319,145	2,391,417	967,773	163,479	66,158
- Missouri	127,563	51,623	-	-	238	96
	11,476,804	4,644,502	20,602,147	8,337,400	3,888,363	1,573,566

⁴ This information represents the expanded supply base. Certified Forest by Scheme: ATFS and SFI acres from SFI and are current as of January 2016; FSC FM acres from FSC and are current as of 2017. BP's supply base includes a limited number of counties in Florida, Texas, and Missouri; however, county level certification data is not available thus reported figures reflect all certified acres for these states. Data for a., b., c., and d. from FIA.

Feedstock⁵

- f. Total volume of feedstock: 200,000-400,000 green metric tons
- g. Volume of primary feedstock: 0-200,000 green metric tons
- h. List percentage of primary feedstock (g), by the following categories.
- Subdivide by SBP-approved Forest Management Schemes.
- Large forest holdings certified to an SBP-approved Forest Management Schemes: 80%-100%
 - Large forest holdings not certified to an SBP-approved Forest Management Schemes: 0%-19%
 - Small forest holdings certified to an SBP-approved Forest Management Schemes: 0%-19%
 - Small forest holdings not certified to an SBP-approved Forest Management Schemes: 0%-19%
- i. List all species in primary feedstock, including scientific name:
- Loblolly Pine (*Pinus taeda*)
 - Shortleaf Pine (*Pinus echinata*)
 - Slash Pine (*Pinus elliotti*)
 - Virginia Pine (*Pinus Virginiana*)
 - Longleaf Pine (*Pinus palustris*)
- j. Volume of primary feedstock from primary forest: None
- k. List percentage of primary feedstock from primary forest (i), by the following categories.
- Subdivide by SBP-approved Forest Management Schemes.
- *Primary feedstock* from primary forest certified to an SBP-approved Forest Management Schemes:
0%
 - Primary feedstock from primary forest not certified to an SBP-approved Forest Management Schemes:
0%
- l. Volume of secondary feedstock: 80%-100% residues
- m. Volume of tertiary feedstock: 0%-19%

⁵ Banding, where used, is used in place of specific volumes due to commercial sensitivity as historical, current, or forecasted volumes could be used by third parties to gain competitive advantage.

3 Requirement for a Supply Base Evaluation

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

Less than 100% of feedstock inputs are traceable back to a Certified Forest thus all feedstock inputs have been subjected to a Supply Base Evaluation.

4 Supply Base Evaluation

4.1 Scope

The actual catchment area is significantly smaller than the boundaries of the supply base and extends approximately 150 highway miles from the site. There are a limited number of facilities in the area which utilize the same materials as BP.

4.2 Justification

The Supply Base Evaluation & Risk Assessment addresses each of the SBP Indicators as defined in Standard #1. Westervelt did not modify or adapt the Indicators. Many of the Indicators are similar to the requirements contained in the SFI, FSC, and PEFC Standards. The evidence of conformance to the Indicators in Standard #1 was drawn from existing Indicators and Evidence Manuals and Procedures to demonstrate conformance to the other certification standards, which SBP relies upon and does not attempt to duplicate.

Additional objective evidence of conformance was drawn from State BMP monitoring, forest inventory & analysis statistics, state-wide resource assessments, wildlife action plans and other publicly available sources of information. The existing Documents and Procedures provide the bulk of the evidence contained in the Supply Base Evaluation and Risk Assessment.

4.3 Results of Risk Assessment

4.4 The conclusion of Low Risk for all indicators in prior assessments was based on legacy BP processes designed to ensure a Low Risk outcome. SBP acknowledged and accepted this approach at a readiness review, initial certification audit, and three subsequent surveillance audits. However, based on a recent interpretation by SBP it is now a requirement that the supply base be evaluated independent of legacy BP processes. This results in a reclassification of five indicators from Low Risk to Specified Risk. The measures previously implemented by the BP to achieve a Low Risk designation for these five indicators are still practiced by the BP but have been separately identified

within this report. The BP's processes did not change as a result of this SBP interpretation change. Detailed information for each indicator is available in Annex I.

4.5 Results of Supplier Verification Programme

As indicated in Section 8, a SVP is only required when the findings are inconclusive and the risk is unspecified. Because all findings are either Low Risk or Specified Risk a SVP is not required.

4.6 Conclusion⁶

The initial Supply Base Evaluation & Risk Assessment concluded Low Risk for all indicators based upon legacy Westervelt procedures. The current assessment is based on an interpretation change by SBP which requires that the supply area be evaluated as if the BP were not present. Any actions taken by the BP, even if part of the BP's legacy processes, are to be considered mitigation measures and identified as such in Section 9. The following comments are therefore based on the supply base prior to the implementation of BP measures. However, implementation of BP actions leads to a low risk conclusion for all indicators.

The Supply Base Evaluation reflects a multi-year history and record of BP conformance to Forest Management, Chain of Custody, and Controlled Wood certifications from FSC, SFI, and PEFC. The BP's FSC FM Risk Assessment consistently resulted in a designation of Low Risk for all indicators and will be updated as appropriate when the FSC US CWNRA is finalized. The BP's processes are compliant with FSC –STD-40-005 V3-1 Requirements for Sourcing FSC Controlled Wood. Feedback from the Stakeholder Consultation process for the supply base expansion was positive for the sourcing area and did not result in any contradictory findings.

During CY 2018 between 80%-100% of BP's feed stocks were from secondary sources and between 0%-19% of feed stocks were from primary sources. BP did not utilize any (0%) primary feed stocks from primary forests and a de minimis (0.4%) amount of tertiary feed stocks. Between 80%-100% of primary feed stocks were from forest holdings certified to SBP-approved Forest Management Schemes and 0%-19% were from forest holdings not certified to SBP-approved Forest Management Schemes. Between 20%-39% of feed stocks from all sources were from forest holdings certified to SBP-approved Forest Management Schemes and between 60%-79% were from forest holdings not certified to SBP-approved Forest Management Schemes. All inputs originating within the supply base are considered SBP-compliant feed stocks.

All fiber inputs are purchased under contracts which require the use of trained loggers, compliance with laws and regulations, awareness of High Conservation Value (HCV) sourcing and risk, and compliance with Best Management Practices (BMPs). BMPs are methods or practices used during forestry management to achieve goals related to water quality, silviculture, wildlife and biodiversity, aesthetics, and/or recreation.⁷ They are important tools in minimizing sourcing risk when harvesting wood and are especially important in or near HCV areas. BMPs are often associated only with water quality, but their impact is far greater. Monitoring and protection of HCVs relies heavily on effective BMP implementation. BMP implementation studies conducted in the Southeast U.S. indicate that the mean implementation rate is 92% which is above the mean national implementation rate of 91%.⁸

For additional information regarding Wood Purchase Agreements please refer to Exhibit D Wood Purchase Agreement Overview. For detailed information related to Best Management Practices please refer to Exhibit C Supplemental Information Best Management Practices. For detailed information including specific sites, areas, species, and protection measures please refer to Exhibit B Supplemental Information High Conservation Value and Sourcing Risk. An overview of Westervelt mitigation measures is described in Annex I Exhibit E Risk Mitigation.

⁶ Banding is used in place of specific volumes due to commercial sensitivity as historical, current, or forecasted volumes could be used by third parties to gain competitive advantage.

⁷ Excerpt from FORESTRY Best Management Practices, Peter Smallidge and Gary Goff, Spring 2008, Cornell University College of Agriculture and Life Sciences

⁸ Cristan, R.; Aust, W.M.; Bolding, M.C.; Barrett, S.M.; Munsell, J.F. (2016). *Status of state forestry best management practices for the southeastern United States*. Asheville, NC: U.S. Department of Agriculture Forest Service, Southern Research Station.

5 Supply Base Evaluation Process

R.S. Berg & Associates, Inc. was retained to prepare the SBP Program and Procedures, including conducting the Supply Base Evaluation & Risk Assessment for the company's initial certification assessment in 2015. They were also retained to review and revise documentation in 2017 for the company's supply base scope expansion. R.S. Berg & Associates, Inc. has consulted with over two hundred and eighty (280) forestry organizations in North America and has conducted over forty (40) independent and internal audits to the FSC, SFI, PEFC and American Tree Farm System Standards. A resume, client list and other information is available at the following website: <http://www.rsbergassoc.com>

Michael Ferrucci is an associate at R.S. Berg & Associates and is the president of Interforest LLC Consulting. He holds a B.S. degree in Forest Management from the University of Maine and a Master of Arts in Forest Management and Silviculture degree from the Yale School of Forestry and Environmental Studies. Ferrucci was the Forestry Program Manager for NSF for 11 years, is a member of the Forest Practices Advisory Board of the State of Connecticut, past Chairman and Executive Committee member of the Connecticut Tree Farm Committee, and a frequent speaker on logging and water quality in wetlands. He also lectures on Private Sector Forestry, Leadership and Forest Resources Management at the Yale School of Forestry and Environmental Studies.

Joe Aquino is Head of Sustainability for Pinnacle Renewable Energy, a BP joint venture partner. He holds diplomas in Forest Technology from Selkirk College and a BSc. Degree in Forest Ecology and Management from the University of Northern British Columbia (UNBC). He is a Registered Professional Forester in the province of British Columbia and has 12 years of experience in a variety of roles including Consulting Technician, Planning Forester, Procurement Superintendent, and most recently as the Head of Sustainability. Joe is also an MBA Candidate from UNBC and is set to graduate in April 2019. He sits on the Stakeholder Advisory Committee for SBP and has been leading SBP certification for Pinnacle Renewable Energy since 2016.

Drew Summers is Superintendent of Fiber and Logistics for the Aliceville facility. He graduated from Mississippi State University with a BS in Forestry and has over 10 years of fiber procurement experience. He most recently served in a fiber procurement role for Westrock.

Clint Woods is Timber Procurement Manager for The Westervelt Company and formerly Chain of Custody and Controlled Wood Coordinator for The Westervelt Company. He has a BS in Forest Management from Mississippi State University, is a Registered Forester, Professional Logging Manager, and is experienced in developing FSC Chain of Custody and Controlled Wood Procedures. He has over 16 years of procurement experience in the BP's supply base area.

Mike Williams is Project Director at The Westervelt Company. He has a BS from Morehead State University, completed the Advanced Management Program at Duke University, holds a Certificate of Process Mastery, and is a certified Six Sigma Black Belt. He has over 30 years of forest products industry experience with expertise in sustainability and certification, project development, strategy & planning, process management, and supply chain logistics. He is a current member of the SBP Standards Committee and a past member of the SBP Stakeholder Consultation Committee.

Jonathan Lowery is Forest Sustainability & Policy Manager for the Forest Resources Division of the Westervelt Company and has over 16 years of experience in forest inventory and scheduling. He has a BS in Forestry from Mississippi State and is a Registered Professional Forester. He is responsible for the company's certifications in SFI, FSC, PEFC forest management standards.

6 Stakeholder Consultation

Westervelt conducted a stakeholder consultation for a period of thirty (30) days beginning October 18, 2017 and ending November 17, 2017 in conjunction with a supply base scope change. A list of relevant stakeholders was developed based upon several criteria including: the geographic scope of the Supply Base, stakeholders from past FSC/PEFC/SFI audits and consultations, relevant federal and state natural resource agencies, private conservation organizations, indigenous peoples, academia, advocacy organizations, professional organizations, as listed below. The list of potential stakeholders was reviewed with the CB prior to the consultation. A notice to all interested parties was also posted on Westervelt's website during the entire consultation period.

Requests for comment were issued to 126 potential stakeholders and of this amount, 9 were returned as undeliverable, with a delivery success rate of approximately 93% (117 potential stakeholders). The distribution of requests by potential stakeholder group is as follows.

Natural Resource Agencies	50	39.7%
Nongovernmental Organizations	22	17.5%
Academia/Research/Advocacy	19	15.1%
Professional Organizations	16	12.7%
Industry	6	4.8%
Consultancies	5	4.0%
Indigenous Peoples	4	3.2%
Certification Standards	4	3.2%
<i>Total Solicited Requests</i>	126	100.0%

In conjunction with the supply base scope change, the CB also conducted a stakeholder consultation which did not result in any negative feedback.

6.1 Response to stakeholder comments

Tim L. Gothard, Alabama Wildlife Federation Executive Director

Requested general information regarding SBP, and specific information on the Standard's focus on High Conservation Value areas, land conversion, expansion of the pellet industry in the US Southeast, and fiber consumption.

Response:

Provided a 4.5-page document consisting of 20 Frequently Asked Questions which addressed Mr. Gothard's request. A copy of the document is available upon request.

No other feedback was received.

7 Overview of Initial Assessment of Risk

Based on a recent interpretation by SBP, BP's assessment of risk against the requirements in Standard #1 results in a finding of Specified Risk for five indicators. Measures within BP's legacy processes as identified in Section 9.1 mitigate these to Low Risk status.

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

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

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

Table 2. Overview of results from the risk assessment of all Indicators (after SVP and/or mitigation measures)

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

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

8 Supplier Verification Programme

8.1 Description of the Supplier Verification Programme

BP's Risk Assessment did not result in findings of inconclusive (Unspecified Risk) for any indicator. Because all findings were Low Risk or Specified Risk a SVP is not applicable.

8.2 Site visits

Not applicable

8.3 Conclusions from the Supplier Verification Programme

Not applicable

9 Mitigation Measures

9.1 Mitigation measures

The measures and monitoring responses below represent actions taken by the BP or on behalf of the BP by BP-affiliate (Westervelt) and represent a general summary of responses which are more fully detailed in Annex I and the Exhibits incorporated therein.

Indicator 2.1.1

The Biomass Producer has implemented appropriate control systems and procedures for verifying that forests and other areas with high conservation values are identified and mapped.

Risk Designation: "Specified Risk"

In the absence of measures implemented by the BP, this indicator is considered Specified Risk based on FSC (FSC US Controlled Wood National Risk Assessment V1-0 D3-0) risk designations within the supply area. Specifically, high conservation values are threatened by management activities (Category 3) in some areas, and wood from forests is being converted to plantations or non-forest use in some areas (Category 4) making it important that these areas be properly identified and documented.

Mitigation Measures:

We utilize legally binding contracts to identify expectations and requirements. Contracts provide for logger education, logger certification where appropriate, adherence to BMP requirements, and awareness of high

conservation value and risk areas. We provide HCV training packets to primary and secondary suppliers, which combined with the state BMP's provide a thorough overview of HCV areas in the supply base. We provide a map of our supply area to each supplier which identifies the locations of HCV areas. We identify the supply chain, determine the risk profile within the supply base, review supplier records, conduct announced and unannounced audits, review third party assessments, and conduct site audits where appropriate. For primary sources, we utilize the national GAP database to identify protected areas and we reference these by IUCN classifications. For secondary sources appropriate measures are implemented at the saw mill. For all sources, High Conservation Value Forests are addressed in the FSC/PEFC/SFI Controlled Wood/Due Diligence System Risk Assessment (WF-COC-DP-03). Furthermore, we have a functional Environmental Management System, Environmental Policy, Fiber Supply Policy, and conduct internal and third party audits to ensure compliance. In addition, we employ registered foresters, forest rangers, certified wildlife biologists, and forest biometricians in support of our processes. We also sponsor public research and promote sustainable management of forest through participation in SFI State Implementation Committees.

Monitoring:

- Annual supplier questionnaires to primary and secondary suppliers, which details the counties where wood is sourced from.
- Conduct annual sawmill audits of a sample of secondary suppliers to confirm that information provided in the questionnaire is accurate and verifiable.
- Conduct BMP audits on a sample of primary and secondary feedstock suppliers to ensure BMP compliance.
- Require signed contracts with suppliers ensuring HCV's are appropriately managed.
- Conduct field inspections on a sample of primary feedstock tracts to monitor HCV and other land values.
- Map all known HCV sites and ensures all procured feedstock areas do not overlap with HCV areas.
- Utilize numerous third party sources such as HCV Network, WWF, Global Forest Registry, National GAP database, FSC US Controlled Wood National Risk Assessment, etc.

The monitoring efforts provide assurance that forests and other areas with high conservation values are identified and mapped and demonstrate the BP's commitment to ensuring compliance.

Conclusion:

Based on the mitigation measures described herein (including the contents of Annex I – Exhibit E Risk Mitigation and Exhibit B Supplemental Information High Conservation Value (HCV) & Sourcing Risk, this indicator can be considered “Low Risk”.

Indicator 2.1.2

The Biomass Producer has implemented appropriate control systems and procedures to identify and address potential threats to forests and other areas with high conservation values from forest management activities.

Risk Designation: “Specified Risk”

In the absence of measures implemented by the BP, this indicator is considered Specified Risk based on FSC (FSC US Controlled Wood National Risk Assessment V1-0 D3-0) risk designations within the supply

area. Specifically, high conservation values are threatened by management activities (Category 3) in some areas, and wood from forests is being converted to plantations or non-forest use in some areas (Category 4).

Mitigation Measures:

We utilize legally binding contracts to identify expectations and requirements. Contracts provide for logger education, logger certification where appropriate, adherence to BMP requirements, and awareness of high conservation value and risk areas. We provide HCV training packets to primary and secondary suppliers, which combined with the state BMP's provide a thorough overview of HCV areas in the supply base. We identify the supply chain, determine the risk profile within the supply base, review supplier records, conduct announced and unannounced audits, review third party assessments, and conduct site audits where appropriate. For primary sources, appropriate measures are implemented at the forest unit and for secondary sources they are implemented at the saw mill. Furthermore, we have a functional Environmental Management System, Environmental Policy, Fiber Supply Policy, and conduct internal and third party audits to ensure compliance. In addition, we employ registered foresters, forest rangers, certified wildlife biologists, and forest biometricians in support of our processes. We also sponsor public research and promote sustainable management of forest through participation in SFI State Implementation Committees.

Monitoring:

- Annual supplier questionnaires to primary and secondary suppliers, which details the counties where wood is sourced from.
- Conduct annual sawmill audits of a sample of secondary suppliers to confirm that information provided in the questionnaire is accurate and verifiable.
- Conduct BMP audits on a sample of primary and secondary feedstock suppliers to ensure BMP compliance.
- Require signed contracts with suppliers ensuring HCV's are appropriately managed.
- Conduct field inspections on a sample of primary feedstock tracts to monitor HCV and other land values.
- Map all known HCV sites and ensures all procured feedstock areas do not overlap with HCV areas.

The monitoring efforts provide assurance that feedstock suppliers adhere to the requirements of the standard and demonstrate the BP's commitment to ensuring compliance.

Conclusion:

Based on the mitigation measures described herein (including the contents of Annex I – Exhibit E Risk Mitigation, this indicator can be considered “Low Risk”.

Indicator 2.1.3

The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not sourced from forests converted to production plantation forest or non-forest lands after January 2008.

Risk Designation: “Specified Risk”

In the absence of measures implemented by the BP, this indicator is considered Specified Risk based on FSC (FSC US Controlled Wood National Risk Assessment V1-0 D3-0) risk designations within the supply area. Specifically, wood from forests is being converted to plantations or non-forest use in some areas (Category 4).

Mitigation Measures:

We do not source from forests converted to production plantation forest or non-forest lands after January

2008, nor do we allow our suppliers to source from these areas under the terms of legally binding contracts. Our FSC and PEFC Chain of Custody Procedures (WF-DP-01) identify the process by which conversion of forests to non-forest land uses can be documented and avoided. We, along with our suppliers, are legally obligated to adhere to all state and federal environmental protection programs which can apply when conversion occurs. We utilize a number of resources such as Global Forest Watch, National Land Cover Dataset, etc. to check for conversion.

Monitoring:

- Annual supplier questionnaires to primary and secondary suppliers, which details the counties where wood is sourced from.
- Conduct annual sawmill audits of a sample of secondary suppliers to confirm that information provided in the questionnaire is accurate and verifiable.
- Conduct BMP audits on a sample of primary and secondary feedstock suppliers to ensure BMP compliance.
- Require signed contracts with suppliers ensuring land conversion is not done.
- Conduct field inspections on a sample of primary feedstock tracts to monitor silviculture practices
- Map all known HCV sites and ensures all procured feedstock areas do not overlap with HCV areas.

The monitoring efforts provide assurance that feedstock suppliers adhere to the requirements of the standard and demonstrate the BP's commitment to ensuring compliance.

Conclusion:

Based on the mitigation measures described herein (including the contents of Annex I – Exhibit E Risk Mitigation, this indicator can be considered “Low Risk”.

Indicator 2.2.1

The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them.

Risk Designation: “Specified Risk”

This indicator was listed as low risk in the FSC controlled wood risk assessment (FSC US Controlled Wood National Risk Assessment V1-0 D3-0). It was identified during last surveillance audit there was insufficient publicly available evidence to consider this indicator low risk, particularly in relation to secondary feedstock. As a result, the BP has included additional control measures to ensure the risk designation can be considered low risk after the implementation of mitigation measures.

Mitigation Measures:

We utilize legally binding contracts to identify expectations and requirements. Contracts provide for logger education, logger certification where appropriate, adherence to BMP requirements, and awareness of high conservation value and risk areas. We identify the supply chain, determine the risk profile within the supply base, review supplier records, conduct announced and unannounced audits, review third party assessments, and conduct site audits where appropriate. For primary sources, appropriate measures are implemented at the forest unit and for secondary sources they are implemented at the saw mill. Furthermore, we have a functional Environmental Management System, Environmental Policy, Fiber Supply Policy, and conduct internal and third party audits to ensure compliance. In addition, we employ registered foresters, forest rangers, certified wildlife biologists, and forest biometricians in support of our processes. We also sponsor

public research and promote sustainable management of forest through participation in SFI State Implementation Committees.

Monitoring:

- Annual supplier questionnaires to primary and secondary suppliers, which details the counties where wood is sourced from.
- Conduct annual sawmill audits of a sample of secondary suppliers to confirm that information provided in the questionnaire is accurate and verifiable.
- Conduct BMP audits on a sample of primary and secondary feedstock suppliers to ensure BMP compliance.
- Require signed contracts with suppliers ensuring HCV's are appropriately managed.
- Conduct field inspections on a sample of primary feedstock tracts to monitor HCV and other land values.
- Map all known HCV sites and ensures all procured feedstock areas do not overlap with HCV areas.

The monitoring efforts provide assurance that feedstock suppliers adhere to the requirements of the standard and demonstrate the BP's commitment to ensuring compliance.

Conclusion:

Based on the mitigation measures described herein (including the contents of Annex I – Exhibit E Risk Mitigation, this indicator can be considered “Low Risk”.

Indicator 2.2.3

The Biomass Producer has implemented appropriate control systems and procedures to ensure that key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).

Risk Designation: “Specified Risk”

In the absence of measures implemented by the BP, this indicator is considered Specified Risk based on FSC (FSC US Controlled Wood National Risk Assessment V1-0 D3-0) risk designations within the supply area. Specifically, high conservation values are threatened by management activities (Category 3) in some areas, and wood from forests is being converted to plantations or non-forest use in some areas (Category 4).

Mitigation Measures:

We utilize legally binding contracts to identify expectations and requirements. Contracts provide for logger education, logger certification where appropriate, adherence to BMP requirements, and awareness of high conservation value and risk areas. We identify the supply chain, determine the risk profile within the supply base, review supplier records, conduct announced and unannounced audits, review third party assessments, and conduct site audits where appropriate. For primary sources, appropriate measures are implemented at the forest unit and for secondary sources they are implemented at the saw mill. Furthermore, we have a functional Environmental Management System, Environmental Policy, Fiber Supply Policy, and conduct internal and third party audits to ensure compliance. In addition, we employ registered foresters, forest rangers, certified wildlife biologists, and forest biometricians in support of our processes. We also sponsor public research and promote sustainable management of forest through participation in SFI State Implementation Committees.

Monitoring:

- Annual supplier questionnaires to primary and secondary suppliers, which details the counties where wood is sourced from.
- Conduct annual sawmill audits of a sample of secondary suppliers to confirm that information provided in the questionnaire is accurate and verifiable.

- Conduct BMP audits on a sample of primary and secondary feedstock suppliers to ensure BMP compliance.
- Require signed contracts with suppliers ensuring HCV's are appropriately managed.
- Conduct field inspections on a sample of primary feedstock tracts to monitor HCV and other land values.
- Map all known HCV sites and ensures all procured feedstock areas do not overlap with HCV areas.

The monitoring efforts provide assurance that feedstock suppliers adhere to the requirements of the standard and demonstrate the BP's commitment to ensuring compliance.

Conclusion:

Based on the mitigation measures described herein (including the contents of Annex I – Exhibit E Risk Mitigation, this indicator can be considered “Low Risk”.

Indicator 2.2.4

The Biomass Producer has implemented appropriate control systems and procedures to ensure that biodiversity is protected (CPET S5b)

Risk Designation: “Specified Risk”

In the absence of measures implemented by the BP, this indicator is considered Specified Risk based on FSC (FSC US Controlled Wood National Risk Assessment V1-0 D3-0) risk designations within the supply area. Specifically, high conservation values are threatened by management activities (Category 3) in some areas, and wood from forests is being converted to plantations or non-forest use in some areas (Category 4).

Mitigation Measures:

We utilize legally binding contracts to identify expectations and requirements. Contracts provide for logger education, logger certification where appropriate, adherence to BMP requirements, and awareness of high conservation value and risk areas. We identify the supply chain, determine the risk profile within the supply base, review supplier records, conduct announced and unannounced audits, review third party assessments, and conduct site audits where appropriate. For primary sources, appropriate measures are implemented at the forest unit and for secondary sources they are implemented at the saw mill. Furthermore, we have a functional Environmental Management System, Environmental Policy, Fiber Supply Policy, and conduct internal and third party audits to ensure compliance. In addition, we employ registered foresters, forest rangers, certified wildlife biologists, and forest biometricians in support of our processes. We also sponsor public research and promote sustainable management of forest through participation in SFI State Implementation Committees.

Monitoring:

- Annual supplier questionnaires to primary and secondary suppliers, which details the counties where wood is sourced from.
- Conduct annual sawmill audits of a sample of secondary suppliers to confirm that information provided in the questionnaire is accurate and verifiable.
- Conduct BMP audits on a sample of primary and secondary feedstock suppliers to ensure BMP compliance.
- Require signed contracts with suppliers ensuring HCV's are appropriately managed.
- Conduct field inspections on a sample of primary feedstock tracts to monitor HCV and other land values.
- Map all known HCV sites and ensures all procured feedstock areas do not overlap with HCV areas.

The monitoring efforts provide assurance that feedstock suppliers adhere to the requirements of the standard and demonstrate the BP's commitment to ensuring compliance.

Conclusion:

Based on the mitigation measures described herein (including the contents of Annex I – Exhibit E Risk Mitigation, the risk associated with [TBD] can be considered “Low Risk”.

Indicator 2.4.1

The Biomass Producer has implemented appropriate control systems and procedures for verifying that the health, vitality and other services provided by forest ecosystems are maintained or improved (CPET S7a).

Risk Designation: “Specified Risk”

In the absence of measures implemented by the BP, this indicator is considered Specified Risk based on FSC (FSC US Controlled Wood National Risk Assessment V1-0 D3-0) risk designations within the supply area. Specifically, high conservation values are threatened by management activities (Category 3) in some areas, and wood from forests is being converted to plantations or non-forest use in some areas (Category 4).

Mitigation Measures:

We utilize legally binding contracts to identify expectations and requirements. Contracts provide for logger education, logger certification where appropriate, adherence to BMP requirements, and awareness of high conservation value and risk areas. We identify the supply chain, determine the risk profile within the supply base, review supplier records, conduct announced and unannounced audits, review third party assessments, and conduct site audits where appropriate. For primary sources, appropriate measures are implemented at the forest unit and for secondary sources they are implemented at the saw mill. Furthermore, we have a functional Environmental Management System, Environmental Policy, Fiber Supply Policy, and conduct internal and third party audits to ensure compliance. In addition, we employ registered foresters, forest rangers, certified wildlife biologists, and forest biometricians in support of our processes. We also sponsor public research and promote sustainable management of forest through participation in SFI State Implementation Committees.

Monitoring:

- Annual supplier questionnaires to primary and secondary suppliers, which details the counties where wood is sourced from.
- Conduct annual sawmill audits of a sample of secondary suppliers to confirm that information provided in the questionnaire is accurate and verifiable.
- Conduct BMP audits on a sample of primary and secondary feedstock suppliers to ensure BMP compliance.
- Require signed contracts with suppliers ensuring HCV's are appropriately managed.
- Conduct field inspections on a sample of primary feedstock tracts to monitor HCV and other land values.
- Map all known HCV sites and ensures all procured feedstock areas do not overlap with HCV areas.

The monitoring efforts provide assurance that feedstock suppliers adhere to the requirements of the standard and demonstrate the BP's commitment to ensuring compliance.

Conclusion:

Based on the mitigation measures described herein (including the contents of Annex I – Exhibit E Risk Mitigation, this indicator can be considered “Low R

9.2 Monitoring and outcomes

BP implements a comprehensive sampling and monitoring program to ensure compliance for all biomass feed stocks.

Primary Sources

A contract is executed for each tract of land from which biomass originates. Westervelt ensures that purchased biomass meets all requirements and documents the location of the tract prior to contract finalization and commencement of harvesting activity. The Section, Township, Range, Tract Name, and Contract Number are recorded for each source location. Delivery driver and tract identification cards issued by Westervelt must be scanned upon arrival at BP's scale house for each load of material received. The facility does not accept random deliveries of biomass from unknown sources or locations.

Westervelt's wood procurement staff audits 100% of purchases from company owned lands and a minimum of 10% of the tracts from non-company owned sources. Compliance verification measures include completion of a questionnaire for each tract, a review of BMPs, confirmation that conversion to non-forest uses does not occur, verification of the use of certified/trained loggers, etc. For non-company owned lands that have a BMP audit performed, a letter is sent to each supplier after harvesting is complete to identify potential Corrective Actions and/or to reinforce the use of good practices. For company-owned lands compliance information is reported internally and is formally reported in Forest Resources Environmental Management System committee meetings.

Secondary Sources

Secondary residues in the form of shavings, sawdust, and chips are purchased from several external sources as well as from BP's affiliate-owned sawmill. All secondary biomass is controlled and includes both certified and non-certified sources.

BP's procurement staff visits each supplying mill a minimum of once every 12 months (on a rolling basis) to inspect records, observe material receipt and storage practices, and to audit contract compliance.

A contract is required with each non-affiliate owned supplier of secondary shavings, sawdust, and chips and identifies allowable wood species, addresses legality, civil rights, high conservation value areas, conversion to non-forest use, the non-use of genetically modified trees, etc. Furthermore, the supplier is responsible for documenting the county of origin for all biomass and other relevant information that must be made available to BP and the CB upon request. BP's procurement staff evaluates each biomass supplier prior to entering into a contract, and audits secondary suppliers initially and at least once each five years. Driver and contract identification cards issued by BP must be scanned upon at delivery for each load of material received. BP does not accept random deliveries of biomass from unknown sources or locations.

10 Detailed Findings for Indicators

Detailed findings for each Indicator are given in Annex 1 and the Exhibits incorporated therein.

11 Review of Report

11.1 Peer review

A Readiness Review for the initial certification audit was conducted with the accredited Certification Body (NSF) and witnessed by a SBP representative. Over 45 letters were sent to potential stakeholders. The accredited Certification Body assigned two auditors to conduct an independent audit of the SBP Program. The Certification Body also conducted an independent consultation with potential stakeholders. Additionally, the Certification Body's assessment is subject to independent third-party review. Independent auditors conduct annual surveillance audits of the Westervelt SFI, PEFC, and FSC certification programs. SBP has convened a Technical Review Panel to review the audit findings.

Westervelt believes sufficient independent review of its Program and Procedures was undertaken and additional Peer Review is neither warranted nor required.

11.2 Public or additional reviews

The basis for this report is the recent change in supply area scope which was reviewed and edited by Michael Ferrucci, Principal at Interforest LLC whose credentials are described in Section 5, page ten. In addition to potential stakeholders contacted directly by Westervelt and the CB as part of the Stakeholder Consultation process, notification to all interested parties was posted on Westervelt's website at the beginning of the consultation.

12 Approval of Report

Approval of Supply Base Report by senior management			
Report Prepared by:	/s/ <i>Joe Aquino</i>	<i>Head of Sustainability</i>	<i>3/8/2019</i>
	Name	Title	Date
The undersigned persons confirm that I/we are members of the organisation's senior management and do hereby affirm that the contents of this evaluation report were duly acknowledged by senior management as being accurate prior to approval and finalisation of the report.			
Report approved by:	/s/ <i>Vaughan Bassett</i>	<i>Senior Vice President of Sale and Logistics</i>	<i>3/8/2019</i>
	Name	Title	Date
Report approved by:	/s/ <i>Drew Summers</i>	<i>Logistics & Procurement</i>	<i>3/8/2019</i>
	Name	Title	Date
Report approved by:	/s/ <i>Clint Woods</i>	<i>Timber Procurement Manager</i>	<i>3/8/2019</i>
		Title	Date
Report approved by:	/s/ <i>Mike Williams</i>	<i>Project Director</i>	<i>3/8/2019</i>
	Name	Title	Date

13 Updates

13.1 Significant changes in the Supply Base

BP continues to source secondary residual biomass from within the supply base area as shown in Exhibit 'A' Supply Base Area Map. Because of haul distance constraints, BP does not plan to utilize any softwood round wood originating outside of Alabama or Mississippi nor does it plan to utilize hardwood round wood originating from any location.

The supply base area accounts for supply basins of suppliers and sub-suppliers and reflects a growing supply of secondary biomass fiber which cannot otherwise not be utilized. Significant saw mill expansion continues to generate additional secondary residues in a region where there is already an excess supply of this material, and in some instances lack of outlets result in the need for sawmills to temporarily curtail production.

13.2 Effectiveness of previous mitigation measures

All previously identified measures remain effective based on internal and external reviews.

13.3 New risk ratings and mitigation measures

Refer to Section 9 for indicators 2.1.1, 2.1.2, 2.1.3, 2.2.1, 2.2.3, 2.2.4, and 2.4.1 recently reclassified from Low Risk to Specified Risk. Description of mitigation measures is indicated in Section 9 and Appendix I – Exhibit E Risk Mitigation.

13.4 Actual figures for feedstock over the previous 12 months

Feedstock⁹

- f. Total volume of feedstock: 200,000-400,000 green metric tons
- g. Volume of primary feedstock: 0,-200,000 green metric tons
- h. List percentage of primary feedstock (g), by the following categories.
- Subdivide by SBP-approved Forest Management Schemes.
- Large forest holdings certified to an SBP-approved Forest Management Schemes: 80%-100%
 - Large forest holdings not certified to an SBP-approved Forest Management Schemes: 0%-19%
 - Small forest holdings certified to an SBP-approved Forest Management Schemes: 0%-19%
 - Small forest holdings not certified to an SBP-approved Forest Management Schemes: 0%-19%
- i. List all species in primary feedstock, including scientific name:
- Loblolly Pine (*Pinus taeda*)
 - Shortleaf Pine (*Pinus echinata*)
 - Slash Pine (*Pinus elliotti*)
 - Virginia Pine (*Pinus Virginiana*)
 - Longleaf Pine (*Pinus palustris*)
- j. Volume of primary feedstock from primary forest: None
- k. List percentage of primary feedstock from primary forest (i), by the following categories.
- Subdivide by SBP-approved Forest Management Schemes.
- Primary feedstock from primary forest certified to an SBP-approved Forest Management Schemes:
0%
 - Primary feedstock from primary forest not certified to an SBP-approved Forest Management Schemes:
0%
- l. Volume of secondary feedstock: 80%-100% residues
- m. Volume of tertiary feedstock: 0%-19%

⁹ Banding, where used, is used in place of specific volumes due to commercial sensitivity as historical, current, or forecasted volumes could be used by third parties to gain competitive advantage.

13.5 Projected figures for feedstock over the next 12 months

Feedstock¹⁰

- f. Total volume of feedstock: 200,000-400,000 green metric tons
- g. Volume of primary feedstock: 0-200,000 green metric tons
- h. List percentage of primary feedstock (g), by the following categories.
- Subdivide by SBP-approved Forest Management Schemes.
- Large forest holdings certified to an SBP-approved Forest Management Schemes: 80%-100%
 - Large forest holdings not certified to an SBP-approved Forest Management Schemes: 0%-19%
 - Small forest holdings certified to an SBP-approved Forest Management Schemes: 0%-19%
 - Small forest holdings not certified to an SBP-approved Forest Management Schemes: 0%-19%
- i. List all species in primary feedstock, including scientific name:
- Southern Yellow Pine is the predominant species which includes Loblolly Pine (*Pinus taeda*), Shortleaf Pine (*Pinus echinata*), Slash Pine (*Pinus ellioti*), Virginia Pine (*Pinus Virginiana*), and de minimis volumes of Longleaf Pine (*Pinus palustris*¹¹. Traces of mixed southern hardwoods including various varieties of oak, hickory, ash, maple, and others may appear if in-woods chipping is utilized¹².
- j. Volume of primary feedstock from primary forest: 0.0 metric tonnes
- k. List percentage of primary feedstock from primary forest (i), by the following categories.
- Subdivide by SBP-approved Forest Management Schemes.
- Primary feedstock from primary forest certified to an SBP-approved Forest Management Schemes:
0.0%
 - Primary feedstock from primary forest not certified to an SBP-approved Forest Management Schemes:
0.0%
- l. Volume of secondary feedstock: 80%-100% residues
- m. Volume of tertiary feedstock: 0%-19%

¹⁰ Banding, where used, is in place of specific volumes due to commercial sensitivity as historical, current, or forecasted volumes could be used by third parties to gain competitive advantage. These volumes are estimated and subject to change depending on material availability and capacity utilization of the production facility.

¹¹ See Section 2.1, Protected Species, page three, for discussion on CITES and/or IUCN species.

¹² A full list of hardwood species is available upon request.

