

# SCS Global Services Evaluation of Georgia Biomass, LLC Compliance with the SBP Framework: Public Summary Report

Third Surveillance Audit

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## Completed in accordance with the CB Public Summary 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](http://www.sbp-cert.org)*

### *Document history*

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# 1 Overview

CB Name and contact:	SCS Global Services
Primary contact for SBP:	Sarah Harris
Current report completion date:	29/Jun/2018
Report authors:	Kyle Meister
Name of the Company:	Georgia Biomass, LLC
Company contact for SBP:	Barry Parrish
Certified Supply Base:	128 counties of Alabama (5), Florida (38) and Georgia (85).
SBP Certificate Code:	SBP-04-21
Date of certificate issue:	18/Jan/2016
Date of certificate expiry:	17/Jan/2021

This report relates to the Third Surveillance Audit

## 2 Scope of the evaluation and SBP certificate

This certificate covers the production and trade of wood pellets transported by rail to the Port of Savannah, Georgia, USA. It also covers a Supply Base Evaluation for the sourcing of feedstock from 128 counties of Alabama (5), Florida (38) and Georgia (85) in the United States of America.

The scope of this transfer surveillance audit included a review of procedures, documentation, records and databases to ensure the organization's management system is appropriate to ensuring conformance to SBP Standards 1, 2, 4, and 5. Other audit methods used were interviews with relevant staff. The evaluation included a desk review of documentation such as the supply base report including the risk assessment, FSC and PEFC DDS, supplier contracts, SAR and SBPD, among others.

### 3 Specific objective

The specific objective of the certificate transfer evaluation was to confirm that the Biomass Producer's management system is capable of ensuring that all requirements of specified SBP Standards are implemented across the entire scope of certification.

The following SBP critical control points were audited and are described here and in the report:

\*Feedstock procurement: All wood delivered to the mill is tracked in the 3 Log System. Prior to delivery of round wood to the scale house, the tract and owner name, district of origin (Lat/Long), converted status, product type, and price are obtained from the supplier and entered onto a Medium-Term Delivered Fiber Proposal form by the company's procurement foresters.

\*Storage and processing: Pine roundwood is processed into wood pellets by being chipped, dried, hammered, and extruded into pellets and the bark is used as boiler fuel. In-woods chips are dried, hammered, and extruded into pellets. Sawmill residual is hammered and pelletized. The conversion factors used to allocate the pine roundwood and in-wood chips into pellets are reasonable.

\*Volume Accounting: The DCS details the process to properly maintain the volume credit spreadsheet, with provisions for subtracting certified product sold and for carrying only the past 12 months of credits.

\*Outgoing transactions: Invoices are issued and all outgoing transactions of SBP-certified biomass are recorded in the DTS

\*Energy data collection and reporting: The organization developed and maintains databases to record data values and calculate energy data as required by Standard 5 and keeps records that substantiate the data.

## 4 SBP Standards utilised

### 4.1 SBP Standards utilised

Please select all SBP Standards used during this evaluation. All Standards can be accessed and downloaded from <https://sbp-cert.org/documents/standards-documents/standards>

- SBP Framework Standard 1: Feedstock Compliance Standard (Version 1.0, 26 March 2015)
- SBP Framework Standard 2: Verification of SBP-compliant Feedstock (Version 1.0, 26 March 2015)
- SBP Framework Standard 4: Chain of Custody (Version 1.0, 26 March 2015)
- SBP Framework Standard 5: Collection and Communication of Data (Version 1.0, 26 March 2015)

### 4.2 SBP-endorsed Regional Risk Assessment

Not applicable.

## 5 Description of Company, Supply Base and Forest Management

### 5.1 Description of Company

Georgia Biomass supplies wood fiber to its pellet mill located in Waycross, Georgia. The company sources roundwood, in woods chips, sawmill residuals and hog fuel from the states of Alabama, Georgia and Florida. Pine is the primary component although some hardwood is utilized. The fiber procurement organization consists of a manager, two foresters and administrative personnel. Inputs: 26% of the input material is SFI and ATFS certified (both PEFC endorsed) and the remaining is FSC/PEFC controlled. Outputs: SBP Compliant and EUTR Compliant Biomass.



## 5.2 Description of Company's Supply Base

Georgia Biomass, LLC (GBLLC) purchases softwood and hardwood wood fiber from 128 counties: five in Alabama, 38 in Florida and 85 in Georgia within the United States. Forests are the predominant land use in this supply base (68%) Pine forests comprise the largest forest type (51%) of the supply area's forest followed by hardwood forests (37%). The pine/oak forest comprises 10% of the supply area's forest type while about 2% of the forest is considered non-stocked. About 59% of the supply area's forests are managed as natural forests (3.16 MM hectares) while the remaining 41% of the supply area's forests are artificially regenerated (2.17 MM hectares). GBLLC purchases its fiber primarily from private landowners. Small landowners provide 58% of the fiber furnish while large private landowners provide the remaining 42%. No fiber originates from public lands. The forest products industry is a very large part of the area's economy and is one of the top industries within both states generating \$16.9 billion in GA and \$14.5 billion in FL annually. In GA there are 12 pulp/paper manufacturing facilities and 10 bioenergy facilities within the state providing 48,740 jobs. In 2014, the bioenergy industry provided 672 jobs in Georgia. In FL there are 67 wood products facilities and 6 pulp/paper manufacturing facilities within the state. The GBLLC pellet mill is one of the largest in the United States. Pine species dominate most of the forests within the supply area. Primary species for these pine forests include loblolly pine (*Pinus taeda*), slash pine (*Pinus elliotii*) and longleaf pine (*Pinus palustris*). Primary species for the hardwood forests include oak (*Quercus* spp.), sweetgum (*Liquidambar styraciflua*), maple (*Acer* spp.), sycamore (*Platanus occidentalis*) and blackgum (*Nyssa sylvatica*). No species purchased at the GBLLC facility is listed on the CITES list. Longleaf pine was recently added to the IUCN Red List. Pine forests are typically managed on an even-aged basis with a rotation age of 25 to 30 years. During this rotation the pine stand may be thinned one or two times during the middle of the rotation with a final harvest completing the rotation. Most pine forests are artificially regenerated with pine seedlings planted by hand to defined stand densities. Chemical and/or mechanical site preparation is typically used to manage the less desirable hardwood species and herbaceous species at stand establishment. Chemical treatments are minimal or below label rates; do not kill all competing species and last about two years so the pine seedlings can become established. Fertilizers are not normally applied to these forests due to costs. Some private investment groups (REITS, TIMOs) may apply fertilizers on forests which are more intensively managed. These intensively managed pine forests represent a very small percentage of the overall pine forests in the supply basin. Hardwood forests can be managed either as even-aged or uneven-aged stands. Most hardwood stands are 40 to 50 years when harvested if managed as an even-aged stand. No site preparation or fertilizers are used on hardwood forests. Most forests in the GBLLC supply area are managed according to state forestry best management practices (BMPs). While these BMPs are normally voluntary, all GBLLC suppliers are contractually required to abide by them. Supplier compliance with state BMPs is verified by periodic audits conducted by GBLLC. GBLLC's Sustainable Forestry Initiative (SFI) fiber sourcing certification and procedures require all harvesting professionals to maintain continuing education training on BMPs and other sustainable forestry issues such as wildlife habitats and biodiversity and aesthetics. Overall BMP compliance reported for 2015 was 91.13% (GA), 99.3% (FL), and 98.2% (AL). Sustainable forestry certification is present in GBLLC's supply with the company purchasing 26% of its fiber as certified (SFI – 19% and ATF – 6.9%). No FSC certified fiber has been purchased to date. GBLLC purchases pine and hardwood roundwood as its primary feedstock from about 45 wood suppliers. Secondary feedstock is received in the form of pine and hardwood residual chips from about 32 sawmill suppliers. Pine roundwood accounts for the majority (70%) of the total feedstock with hardwood roundwood, sawdust, shavings, and residual chips comprising the remainder. Hardwood roundwood accounts for less than 1% of the total feedstock. Roundwood comes from small forest landowners (58%) and large forest landowners (42%). No roundwood comes from publically owned sources. The company's public summary information can be found at: <https://www.gabiomass.com/sustainable-products>.

## 5.3 Detailed description of Supply Base

a. Total Supply Base area (ha): 5,878,843 ha (Forested lands)  
b. Tenure by type (ha): Privately owned (5,243,750 ha)/ Public 635,092 ha  
c. Forest by type (ha): Temperate (5,878,843 ha)  
d. Forest by management type (ha): Plantation (2,130,885 ha)/ Managed Natural (3,624,083 ha) /Natural (136,183 ha)  
e. Certified forest by scheme (ha): SFI (2,931,384 ha - total) (GA – 957,162 ha) (FL – 760,642 ha), SFI (AL – 1,191,750 ha), ATF (GA state-wide 778,695 ha) / ATF (FL state-wide 385,487 ha), ATF (AL state-wide 1,117,865 ha). More information is available in the publicly available Supply Base report found on its SBP certificate page and its own website.

## 5.4 Chain of Custody system

The company is certified to the SFI Standard (NSF-SFI-CS-C0251114) as well as the FSC (SCS-COC-005306), SFI (NSF-SFI-COC-C0251114) and PEFC (NSF-PEFC-COC-C0251114) Chain of Custody Standards. All COC certificates cover its Waycross, GA facility and the port facility in Savannah, GA. The company uses the following outsourcer covered under the company's COC certifications: East Coast Terminal, Inc., a port facility manager in Savannah, GA that stores and loads pellets onto ocean-going vessels. For SBP, the outsourcer must ensure that COC control and outsourcing procedures are implemented properly. The company may purchase SBP-compliant pellets from other suppliers, have them delivered to the port facility, and mix them with the company's pellets. The company has developed a procedure to mass balance the GHG data from all suppliers should it elect to purchase pellets. Per purchase and sales documentation reviewed during the transfer audit, the company has not purchased pellets from any third-parties. The company uses the PEFC COC system as basis for the SBP COC.

## 6 Evaluation process

### 6.1 Timing of evaluation activities

An opening meeting was held on March 26, 2018 to confirm the scope of the desk audit, availability of documents, and timing of the closing meeting. The audit was led by Kyle Meister (Standards 1, 2, and 4) with Ellen Kincaid assisting (Standard 5). Participants from the organization included Barry Parrish, Richard Harris, and Will Freeman. Audit activities consisted of document and record review, as well as a series of interviews conducted with staff of the organization over the phone. A closing meeting was held on March 28, 2018 to summarize findings. No diverging opinions were noted

### 6.2 Description of evaluation activities

Relevant documents and records relating to standards 1, 2, 4, and 5 were reviewed as provided by the company. Phone interviews were held as part of the desk audit to clarify the purpose of certain documents and records. This was a desk audit.

### 6.3 Process for consultation with stakeholders

Since this was a transfer audit conducted as a desk audit, less than one year has passed since the last audit, and there have been no changes to the supply base, no stakeholders were consulted.

## 7 Results

### 7.1 Main strengths and weaknesses

The company has a well-organized document control system used to identify and locate policies and procedures related to its FSC/PEFC and SBP compliance. Record-keeping systems are readily accessible by relevant staff. Main weaknesses have been identified as nonconformities and observations as described in section 10.

### 7.2 Rigour of Supply Base Evaluation

Despite two Major CARs being assigned during the transfer audit, these are due to discrepancies in information provided in public reports and lead to no material change in the low risk designation. The SBE and SBR were reviewed by two independent experts in forestry and wildlife. Given that the company procures pine and hardwood from semi-natural (i.e., secondary growth and/or planted stands) and plantation pine, the overall low risk designation is justified.

### 7.3 Collection and Communication of Data

The company regularly updates transaction and GHG data to the SBP DTS, as confirmed via interviews with staff, record review, and files downloaded from DTS.

### 7.4 Competency of involved personnel

The company prepared its own SBE and relied on external review from two experts in forestry and wildlife for feedback. The company is FSC- and PEFC-certified and has prepared its own Controlled Wood and Due Diligence Risk Assessments based on information from ENGOs, FSC, PEFC, Lacey Act, EUTR, and other credible sources of information.

### 7.5 Stakeholder feedback

No stakeholder comments have been received since the last surveillance audits.

### 7.6 Preconditions

No preconditions were identified.

## 8 Review of Company’s Risk Assessments

*Describe how the Certification Body assessed risk for the Indicators. Summarise the CB’s final risk ratings in Table 1, together with the Company’s final risk ratings. Default for each indicator is ‘Low’, click on the rating to change. Note: this summary should show the risk ratings before AND after the SVP has been performed and after any mitigation measures have been implemented.*

The initial risk assessment determined that all indicators are Low Risk for all areas from which the BP procures biomass. The risk ratings were determined by reviewing the SBE along with supporting evidence such as the company policy requires, Chain of Custody Procedures, FSC Controlled Wood / PEFC Due Diligence Risk Assessment (GBLLC-DOC-018), delivered Fiber and Logging & Hauling Agreements. There are no sub-scopes.

**Table 1. Final risk ratings of Indicators as determined BEFORE the SVP and any mitigation measures.**

Indicator	Risk rating (Low or Specified)	
	Producer	CB
1.1.1	Low	Low
1.1.2	Low	Low
1.1.3	Low	Low
1.2.1	Low	Low
1.3.1	Low	Low
1.4.1	Low	Low
1.5.1	Low	Low
1.6.1	Low	Low
2.1.1	Low	Low
2.1.2	Low	Low
2.1.3	Low	Low
2.2.1	Low	Low
2.2.2	Low	Low
2.2.3	Low	Low
2.2.4	Low	Low
2.2.5	Low	Low
2.2.6	Low	Low

Indicator	Risk rating (Low or Specified)	
	Producer	CB
2.3.3	Low	Low
2.4.1	Low	Low
2.4.2	Low	Low
2.4.3	Low	Low
2.5.1	Low	Low
2.5.2	Low	Low
2.6.1	Low	Low
2.7.1	Low	Low
2.7.2	Low	Low
2.7.3	Low	Low
2.7.4	Low	Low
2.7.5	Low	Low
2.8.1	Low	Low
2.9.1	Low	Low
2.9.2	Low	Low
2.10.1	Low	Low

2.2.7	Low	Low
2.2.8	Low	Low
2.2.9	Low	Low
2.3.1	Low	Low
2.3.2	Low	Low

**Table 2. Final risk ratings of Indicators as determined AFTER the SVP and any mitigation measures.**

Indicator	Risk rating (Low or Specified)	
	Producer	CB
1.1.1	Low	Low
1.1.2	Low	Low
1.1.3	Low	Low
1.2.1	Low	Low
1.3.1	Low	Low
1.4.1	Low	Low
1.5.1	Low	Low
1.6.1	Low	Low
2.1.1	Low	Low
2.1.2	Low	Low
2.1.3	Low	Low
2.2.1	Low	Low
2.2.2	Low	Low
2.2.3	Low	Low
2.2.4	Low	Low
2.2.5	Low	Low
2.2.6	Low	Low
2.2.7	Low	Low
2.2.8	Low	Low
2.2.9	Low	Low
2.3.1	Low	Low
2.3.2	Low	Low

Indicator	Risk rating (Low or Specified)	
	Producer	CB
2.3.3	Low	Low
2.4.1	Low	Low
2.4.2	Low	Low
2.4.3	Low	Low
2.5.1	Low	Low
2.5.2	Low	Low
2.6.1	Low	Low
2.7.1	Low	Low
2.7.2	Low	Low
2.7.3	Low	Low
2.7.4	Low	Low
2.7.5	Low	Low
2.8.1	Low	Low
2.9.1	Low	Low
2.9.2	Low	Low
2.10.1	Low	Low

## 9 Review of Company's mitigation measures

Since low risk was determined for all indicators, the company has not implemented any mitigation measures outside of ensuring that BMPs and contracts are adhered to.

## 10 Non-conformities and observations

Identify all non-conformities and observations raised/closed during the evaluation (a tabular format below may be used here). Please use as many copies of the table as needed. For each, give details to include at least the following:

- applicable requirement(s)
- grading of the non-conformity (major or minor) or observation with supporting rationale
- timeframe for resolution of the non-conformity
- a statement as to whether the non-conformity is likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks.

<b>NC number 1</b>	<b>NC Grading:</b> Observation
<b>Standard &amp; Requirement:</b>	SBP Framework Standard 1, V1.0, IN 1A, 4.3
<b>Description of Non-conformance and Related Evidence:</b>	
BP has stakeholders from every group except for indigenous people on its stakeholder list. Only one forest worker group has been identified and for a state from which the BP sources infrequently, Alabama. BP should consider including more representatives of forest workers, especially for the other states in its supply base, and reconsider its sources for indigenous people cited in its FSC CWRA as they currently include Wikipedia; official sources such as the Royce Land Cessions should be checked to confirm whether there are any potential contacts for these tribes.	
<b>Timeline for Conformance:</b>	Other Response is optional
<b>Evidence Provided by Company to close NC:</b>	<i>Click or tap here to enter description provided by Company to close the NC.</i>
<b>Findings for Evaluation of Evidence:</b>	<i>Click or tap here to enter findings for evaluation of evidence by the auditor.</i>
<b>NC Status:</b>	Open

<b>NC number 2</b>	<b>NC Grading:</b> Major
<b>Standard &amp; Requirement:</b>	SBP Framework Standard 1, V1.0, IN 1A, 6.1
<b>Description of Non-conformance and Related Evidence:</b>	
The BP does not have a list of relevant ILO Conventions that the USA has ratified.	
<b>Timeline for Conformance:</b>	3 months from the report finalisation



Evidence Provided by Company to close NC:	Click or tap here to enter description provided by Company to close the NC.
Findings for Evaluation of Evidence:	Click or tap here to enter findings for evaluation of evidence by the auditor.
NC Status:	Open

NC number 3	NC Grading: Observation
Standard & Requirement:	SBP Framework Standard 1: Feedstock Compliance V1.0, 1.2.1
Description of Non-conformance and Related Evidence:	
<p>BP's SBE includes state and federal laws as evidence of conformance. Laws in and of themselves are not acceptable evidence; however, evidence of implementation and/or enforcement of laws are acceptable forms of evidence (i.e., systems in place). BP provided evidence of legal compliance and compliance to quasi-regulatory items (e.g., BMPs) in the form of contract and BMP compliance checks. BP has a publicly available sustainable forestry policy that affirms its commitment to comply with labor, health &amp; safety, and other social laws. Per interviews with staff, BP also implements training, salary reviews, and other HR-related process to ensure compliance to labor, health &amp; safety, and other social laws. BP also cites child labor laws from Mississippi, which is a state not included in the supply base. All states in the supply base have relevant child labor laws cited.</p>	
Timeline for Conformance:	Other Response is optional
Evidence Provided by Company to close NC:	Click or tap here to enter description provided by Company to close the NC.
Findings for Evaluation of Evidence:	Click or tap here to enter findings for evaluation of evidence by the auditor.
NC Status:	Open

NC number 4	NC Grading: Observation
Standard & Requirement:	SBP Framework Standard 1: Feedstock Compliance V1.0, 1.3.1
Description of Non-conformance and Related Evidence:	
<p>BP has cited timber harvest notification laws cited for Georgia, but not for Alabama and Florida. For example, Alabama has the Logging Notice Act of 2012. It is not clear what Florida's laws are to ensure that evidence of legal harvest is secured prior to harvest. Signed harvest contracts reviewed ensure that rights to harvest the timber are secured prior to harvest. Severance and ad valorem taxes may also be used to demonstrate evidence of legal harvest during or upon completion of harvest in any state. One of the purposes of harvest notification laws is to ensure that any issues regarding ownership and access rights of adjacent landowners and other parties are handled prior to harvest. Conformance to this requirement would be strengthened if any additional evidence of harvest notifications for other states in the supply base were cited and examples of such notifications were provided in future audits (if timber sales are purchased in those states).</p>	
Timeline for Conformance:	Other

	Response is optional
Evidence Provided by Company to close NC:	Click or tap here to enter description provided by Company to close the NC.
Findings for Evaluation of Evidence:	Click or tap here to enter findings for evaluation of evidence by the auditor.
NC Status:	Open

NC number 5	NC Grading: Observation
Standard & Requirement:	SBP Framework Standard 1: Feedstock Compliance V1.0, 1.6.1
Description of Non-conformance and Related Evidence:	
<p>BP states that “Harvesting in the supply basin presents a low risk of violation of traditional, civil and collective rights based on the following factors: (1) There is no UN Security Council ban on timber exports from the country concerned; (2) The country or district is not designated a source of conflict timber (e.g. USAID Type 1 conflict timber); (3) There are recognized and equitable processes in place to resolve conflicts of substantial magnitude pertaining to traditional rights including use rights, cultural interests or traditional cultural identity in the district concerned; and (4) There is no evidence of violation of the ILO Convention 169 on Indigenous and Tribal Peoples taking place in the forest areas in the district concerned.” Contracts include provisions to respect laws, which includes discrimination and fair labor. The company maintains a list of applicable US and State Laws. However, no sources of information for the BP’s conclusion are cited. Furthermore, the USA has not ratified ILO Convention 169; however, there are laws and regulations in place per item (3) that are in line with the spirit and intent of this Convention.</p>	
Timeline for Conformance:	Other Response is optional
Evidence Provided by Company to close NC:	Click or tap here to enter description provided by Company to close the NC.
Findings for Evaluation of Evidence:	Click or tap here to enter findings for evaluation of evidence by the auditor.
NC Status:	Open

NC number 6	NC Grading: Major
Standard & Requirement:	SBP Framework Standard 1: Feedstock Compliance V1.0, 2.1.1 and 2.1.2
Description of Non-conformance and Related Evidence:	
<p>There are some discrepancies between the SBE and the SBR regarding risks to HCVs, mainly in the omission of conclusions of low risk determined in the SBR, but not communicated in the publicly available SBE. There are sources and examples of endangered ecosystems/species cited in the SBE, such as Alliance for Zero Extinction, World Wildlife Fund Global 200 Ecoregions, Greenpeace Intact Forest, etc. for which the level of risk has not been reported. Upon closer examination, in the BP’s SBR, FSC Controlled Wood/PEFC Due Diligence Risk Assessment (GBLLC-DOC-018), the BP’s conclusion is that “The district of origin may be considered LOW RISK in relation to threat to high conservation values because the</p>	

<p>protected areas evaluated under 3.2 eliminates (or greatly mitigates) the threat posed to the district of origin by non-compliance with 3.1.”In GBLLC-DOC-018, some of the sources, such as Alliance for Zero Extinction and WWF Global 200 Ecoregions, have concluded that there is initially undetermined risk. GBLLC-DOC-018 then includes an analysis of how low risk was determined for these ecosystems based on an analysis of known protected areas and conservation activities. How undetermined risk for such ecosystems was finally determined as low risk is not communicated in the SBE. There are other actions (or inactions) that also contribute to the low risk designation that are not included in the SBE and GBLLC-DOC-018. For example, species such as Florida nutmeg (<i>Torreya taxifolia</i>) occur in areas that are difficult to access with available conventional logging equipment, which also could lead one to conclude low risk. In fact, most harvests are on planted-pine sites and most of the low areas are excluded from sales. So, most ecosystems that are associated with low areas are rarely, if ever, entered with equipment. When they are entered, in most cases it is to cross them to access other production areas. These factors may also contribute to low risk designations in certain cases.</p>	
Timeline for Conformance:	3 months from the report finalisation
Evidence Provided by Company to close NC:	Click or tap here to enter description provided by Company to close the NC.
Findings for Evaluation of Evidence:	Click or tap here to enter findings for evaluation of evidence by the auditor.
NC Status:	Open

NC number 7	NC Grading: Observation
Standard & Requirement:	SBP Framework Standard 2, V1.0, 17.1
Description of Non-conformance and Related Evidence:	
<p>SBR was updated in 2017 as part of the last annual surveillance audit process. While the SBE was updated in 2015, it contains references to information from 2014 and before. For example, there is now FIA data from 2015 and onward for some of the states included in the SBE. Florida also has a 2017 version of its Florida Silviculture Best Management Practices Implementation Survey Report. While these changes are not significant since they likely would leave risk ratings unchanged, the BP will likely have to make updates to its SBE as a part of the transfer audit process. So, it should ensure that all indicators are reviewed for any new or updated sources of information.</p>	
Timeline for Conformance:	Other Response is optional
Evidence Provided by Company to close NC:	Click or tap here to enter description provided by Company to close the NC.
Findings for Evaluation of Evidence:	Click or tap here to enter findings for evaluation of evidence by the auditor.
NC Status:	<i>Choose status.</i>

NC number 8	NC Grading: Minor
Standard & Requirement:	SBP Framework Standard 1: Feedstock Compliance V1.0, 2.2.5

Description of Non-conformance and Related Evidence:	
BP has plans to distribute “Forest Biomass Retention and Harvesting Guidelines for the Southeast” from the Forest Guild to be used as a tool to ensure biomass removal minimizes the harm to ecosystems. However, from interviews conducted, it has not done this yet.	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	Click or tap here to enter description provided by Company to close the NC.
Findings for Evaluation of Evidence:	Click or tap here to enter findings for evaluation of evidence by the auditor.
NC Status:	Open

NC number 9	NC Grading: Observation
Standard & Requirement:	SBP Framework Standard 2, V1.0, 11.2
Description of Non-conformance and Related Evidence:	
The FSC CWRA and SBE contain several credible sources of information. However, for certain topics, such as indigenous people, the BP cites Wikipedia pages. Upon closer examination, these include some credible sources. However, since Wikipedia pages may be subject to change with or without basis, these may not be credible in the long-term. BP should prefer credible sources of information on indigenous people, such as the Royce Land Cession Maps and accompanying summaries.	
Timeline for Conformance:	Other Response is optional
Evidence Provided by Company to close NC:	Click or tap here to enter description provided by Company to close the NC.
Findings for Evaluation of Evidence:	Click or tap here to enter findings for evaluation of evidence by the auditor.
NC Status:	Open

NC number 10	NC Grading: Observation
Standard & Requirement:	SBP ST 5, ID 5B, 4.1.2
Description of Non-conformance and Related Evidence:	
The SAR has the average and maximum distances for feedstock. For all feedstock the maximum distance is more than 1.5x the average distance. Adding a description of the amount of material that is more than 1.5x the average distance would strengthen the SAR. Feedstock #1 includes a description of the diesel used in forestry operations and chipping although upon interview it was clear that this number did not reflect forestry operation and chipping. Removing this number would strengthen the SAR and remove any potential for confusion.	
Timeline for Conformance:	Other

	Response is optional
Evidence Provided by Company to close NC:	Click or tap here to enter description provided by Company to close the NC.
Findings for Evaluation of Evidence:	Click or tap here to enter findings for evaluation of evidence by the auditor.
NC Status:	Open

NC number 11	NC Grading: Minor
Standard & Requirement:	SBP ST 1, 2.7
Description of Non-conformance and Related Evidence:	
<p>The BP relies on BMP compliance checks for supply of primary feedstock, but the SBE does not lay out how this is done to support low risk conclusion for areas where secondary feedstock originates and which might contain HCV, biodiversity and key ecosystems and habitats. Specifically, the link between BMP implementation and the conservation of HCVs and biodiversity values is not explained in sufficient detail to support the low risk designation. The North American Coastal Plain has not been identified as Biodiversity Hotspot in the risk assessment, although listed as such on the website of the Critical Ecosystems Partnership Fund <a href="https://www.cepf.net/our-work/biodiversity-hotspots/north-american-coastal-plain">https://www.cepf.net/our-work/biodiversity-hotspots/north-american-coastal-plain</a>. The evidence presented is a figure in the organization’s FSC Controlled Wood Risk assessment, but this does not identify the CI North American Coastal Plain as per the Critical Ecosystems Partnership Fund website.</p>	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	Click or tap here to enter description provided by Company to close the NC.
Findings for Evaluation of Evidence:	Click or tap here to enter findings for evaluation of evidence by the auditor.
NC Status:	Open



## 11 Certification decision

<b>Based on the auditor's recommendation and the Certification Body's quality review, the following certification decision is taken:</b>	
<b>Certification decision:</b>	Certification approved
<b>Certification decision by (name of the person):</b>	Sebastian Haefele
<b>Date of decision:</b>	29/Jun/2018
<b>Other comments:</b>	<i>Click or tap here to enter text.</i>