SBP

Sustainable Biomass Partnership

Supply Base Report for Georgia Biomass LLC

www.sustainablebiomasspartnership.org

Version 1.2
June 2016

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

Document history

Version 1.0: published 26 March 2015

Version 1.1 published 22 February 2016

Version 1.2 published 23 June 2016

Contents

1 Overview

Producer name: Georgia Biomass, LLC

Producer location: 3390 Industrial Boulevard, Waycross, GA 31503

Geographic position: 82º24'42.38" W / 31º15'22.80" N

Primary contact: Barry Parrish, 3390 Industrial Boulevard, Waycross, GA 31503, (912) 490-5335, Barry.Parrish@gabiomass.com

Company website: www.gabiomass.com

Date report finalised: July 25, 2017

Close of last CB audit: August 3, 2017. Waycross, Georgia USA

Name of CB: NSF International

Translations from English: NA

SBP Standard(s) used: Standard 1 version 1.0, Standard 2 version 1.0, Standard 4 version 1.0, and Standard 5 version 1.0

Web link to Standard(s) used: http://www.sbp-cert.org/documents

SBP Endorsed Regional Risk Assessment: Not Applicable

Web link to SBE on Company website: www.gabiomass.com

Indicate how the current evaluation fits within the cycle of Supply Base Evaluations				
Main (Initial) Evaluation	**First Surveillance**	**Second Surveillance**	**Third Surveillance**	**Fourth Surveillance**
☐	☐	X	☐	☐

2 Description of the Supply Base

2.1 General description

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.

As previously stated, pine forests dominate the majority of the forests within the supply area. Primary species for these pine forests include loblolly pine (*Pinus taeda*), slash pine (*Pinus ellitottii*) 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.

The vast majority of 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.

2.2 Actions taken to promote certification amongst feedstock supplier

GBLLC 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. As part of GBLLC's SFI compliance program, the company promotes SFI and American Tree Farm certification. In addition GBLLC requires logging operations to be conducted by loggers trained in accordance with the state training program as conducted by the SFI state implementation committee.

2.3 Final harvest sampling programme

GBLLC, through its SFI Sourcing system, samples at least 10% or a minimum of twenty (20) harvesting sites of all forest tracts from which its primary feedstock originates. This procedure is described in the company's SFI Fiber Sourcing Procedures (GBLLC-PROC-002, Section 2.2.1). GBLLC Fiber Procurement personnel documents the type of harvest, location of harvest, BMP compliance, etc. on the Tract Inspection Form (GBLLC-DOC-016) to record this sample data.

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

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2.5 Quantification of the Supply Base

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 – 1,191750 ha)
ATF (GA state-wide 778,695 ha) / ATF (FL state-wide 385,487 ha)
ATF (AL state-wide 1,117,865 ha)

Feedstock

f. Total volume of Feedstock: >1,000, 000 tonnes
g. Volume of primary feedstock: >1,000, 000 tonnes
h. List percentage of primary feedstock (g), by the following categories.
- Certified to an SBP-approved Forest Management Scheme – 26% (SFI & ATFS)
- Not certified to an SBP-approved Forest Management Scheme – 74%

i. List all species in primary feedstock, including scientific name

Primary Species:	**Miscellaneous Species (con't):**
Loblolly Pine *(Pinus taeda)*	Hickory (*Carya spp*)Locust (*Robinia spp*)
Longleaf Pine *(Pinus palustris)*	Maple (*Acer spp*)
Slash Pine *(Pinus elliottii)*	Oak (*Quercus spp*)
Miscellaneous Species:	Persimmon (*Diospyros virginiana*)
Pond Pine *(Pinus serotine)*	Red maple (*Acer rubrum*)
Sand Pine *(Pinus clausa)*	Red mulberry (*Morus rubra*)
American beech (*Fagus grandifolia*)	Red oak (*Quercus rubra)*
Ash (*Fraxinus spp*)	River birch (*Betula nigra*)
Basswood, American (*Tilia americana*)	Sassafras (*Sassafras albidum*)
Black cherry (*Prunus serotina*)	Sourwood (*Oxydendrum arboreum*)
Black walnut (*Juglans nigra*)	Sugarberry (*Celtis laevigata*)
Blackgum (*Nyssa sylvatica*)	Sweetgum (*Liquidambar styraciflua*)
Boxelder (*Acer negundo*)	Sycamore (*Platanus occidentalis*)
Buckeye (*Aesculus spp*)	Water oak (*Quercus nigra*)
Eastern cottonwood (*Populus deltoides*)	White oak (*Quercus alba*)
Elm (*Ulmus spp*)	Yellow-poplar (*Liriodendron tulipifera*)
Hackberry (*Celtis occidentalis*)	

j. Volume of primary feedstock from primary forest - None
k. List percentage of primary feedstock from primary forest (j), by the following categories. Subdivide by SBP-approved Forest Management Schemes:
    - Primary feedstock from primary forest certified to an SBP-approved Forest Management Scheme - None
    - Primary feedstock from primary forest not certified to an SBP-approved Forest Management Scheme - None
l. Volume of secondary feedstock:

    Pine Sawmill Chips - 0 – 19%

    Pine Sawmill Sawdust – 0 – 19%

    Pine Sawmill Shavings – 0 – 19%

m. Volume of tertiary feedstock: None

- Banding is used for feedstock volumes because disclosure of the exact figure would reveal commercially sensitive information that could be used by competitors to gain competitive advantage. Feedstock information is commercially sensitive and must be kept confidential due to the close proximity of competitors in the supply base and the strong competition for the feedstock. Increased information in the marketplace would only increase the competition, and may give competitors not bound by similar standards a competitive advantage.

3 Requirement for a Supply Base Evaluation

SBE completed	SBE not completed
X	☐

SBE was completed so that all material can be SBP compliant in accordance with SBP Standard 4, 5.2.2.

4 Supply Base Evaluation

4.1 Scope

The scope of the supply base evaluation of Georgia Biomass LLC is to confirm all indicators of Criteria 1 & 2 of SBP Framework Standard 1: Feedstock Compliance Standard are considered low risk within the defined supply base.

4.2 Justification

The evaluation assessed each of the indicators within Criteria 1 & 2 of SBP Framework Standard 1: Feedstock Compliance to determine if there is a low risk associated with each indicator. This assessment reviewed applicable laws and regulations and forestry best management practices, analysed high conservation areas within the supply base for their rareness and level of protection and assessed the economic impact of the company's presence in the supply base.

This review and analysis was completed using stated laws and regulations, published forestry best management practices, recognized research and data from the USDA Forest Service and conservation organizations such as the World Wildlife Fund, NatureServe, state forestry and wildlife agencies and other noted experts.

4.3 Results of Risk Assessment

The results of the risk assessment indicate there is low risk to all indicators within Criteria 1 & 2 of SBP Framework Standard 1: Feedstock Compliance. No additional supplier assessment programs were identified as needed.

4.4 Results of Supplier Verification Programme

Not applicable; the results of the risk assessment indicate there is low risk to all indicators within Criteria 1 & 2 of SBP Framework Standard 1: Feedstock Compliance.

4.5 Conclusion

Based on the results of the supply base evaluation there is low risk to all indicators within Criteria 1 & 2 of SBP Framework Standard 1: Feedstock Compliance. This conclusion is based on the strong legal and regulatory system found within the supply base. Federal, state and local laws regulations are in place to address a wide range of indicators including, but not limited to, illegal harvesting, water quality, rare and endangered species, worker health and safety, labour rights and air quality. In addition to these laws and regulations, voluntary state forestry best management practices (BMPs) are in place to provide guidance to forest landowners and contractors on how to sustainably manage forests. The company has made these voluntary guidelines mandatory through contract language requiring the use of all BMPs.

Analysis using USDA Forest Service data clearly shows the supply area's forests are growing more fiber and carbon stock than is being harvested. This data along with economic impact studies indicate this company is a key part of the area's economy providing employment opportunities at the manufacturing site as well as throughout the supply area.

5 Supply Base Evaluation Process

The Supply Base Evaluation was completed in partnership with Greener Options Inc., a sustainability consulting company specializing in sustainable forest certification and Biological Integrity LLC, a consulting company specializing in conservation and biodiversity. The competencies of Greener Options Inc. and Biological Integrity LLC are further referenced in Section 11 of this report. The supply base was determined based on primary and secondary feedstock suppliers to ensure the complete geography of the supply area. USDA Forest Service data based on this established supply base was used to verify forest growth and harvest levels, forest ownership and overall forest composition (species, age, stand structure). Ecosystem and biodiversity data from WWF, NatureServe and the various state natural heritage programs from within the supply base was also reviewed to determine potential high conversation value (HCV) areas and the level of protection for these HCVs.

Forest management regimes for the supply base were determined from information gathered from local forestry professionals and contractors within the region. Regional economic and forest health information was gathered from state forestry agencies and forestry associations.

Georgia Biomass LLC requires the use of best management practices (BMPs), adherence to all laws and regulations and harvesting professional training as part of its contract with feedstock suppliers. The company also uses two field verification systems for its primary and secondary feedstocks. Primary feedstock suppliers are verified at the forest level through the company's Sustainable Forestry Initiative (SFI) Fiber Sourcing certification program where company personnel and contractors conduct field inspections of a minimum of 10% of harvest sites for BMPs, harvesting professionals training and traceability. Secondary feedstock suppliers are visited at least annually to confirm their supply base and the species they purchase for their operations.

6 Stakeholder Consultation

A list of twenty-seven (27) local and regional stakeholders was identified for consultation during the 2015 audit. Seven additional stakeholders in Alabama were identified and contacted during the 2016 audits due to a change in the supply base that included five counties in Alabama. These stakeholders represent interests from local contractors and businesses, local governments, state forestry and wildlife agencies, conservation organizations such as the Nature Conservancy, state forestry associations, local forest landowner associations, US Forest Service and US Fish & Wildlife Service. No recognized indigenous peoples groups have been identified within the supply area.

A letter was sent to the identified stakeholders notifying them the intent of Georgia Biomass LLC to become SBP certified and asking for input on their thoughts on Georgia Biomass's business practices and their impact on sustainable forestry in their area. Feedback was requested during the certification process via letter, email and/or telephone. All feedback will be reviewed and responses will be provided.

6.1 Response to stakeholder comments

Responses were received from three of the thirty-four stakeholders contacted. Feedback and responses are listed below:

1. **University of Georgia**
   Daniel B. Warnell School of Forestry and Natural Resources
   Dr. W. Dale Greene - Dean
   Positive comments reaffirming GBLLC's commitment to sustainable forestry practices and the value additional markets provide to sustainable forestry.
   No action necessary
2. **Georgia Forestry Commission**
   Robert Farris – State Forester
   Positive comments referencing positive growth/drain ration and GBLLC track record of forest stewardship
   No action necessary
3. **United States Department of the Interior**
   Fish and Wildlife Service
   Strant Colwell – Coastal Georgia Supervisor

Positive comments indicating bioenergy industry can be expanded in Georgia without threatening sustainability of forest resources. Suggested GBLLC could have a positive impact on sustainable forestry by supporting management techniques that are "friendly" to the environment such as those to protect the gopher tortoise. As a result of this suggestion, GBLLC will place the brochure "Forest Management Practices to Enhance Habitat for the Gopher Tortoise" in Landowner Outreach Packets mailed to landowners in promotion of sustainable forestry. GBLLC will also give the brochure to loggers when inspecting active logging sites.

7 Overview of Initial Assessment of Risk

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

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

Not applicable; all indicators of the initial risk assessment were determined to be low risk so no Supplier Verification Programme is required.

8.2 Site visits

Not applicable; all indicators were determined to be low risk.

8.3 Conclusions from the Supplier Verification Programme

Not applicable; all indicators of the initial risk assessment were determined to be low risk so no Supplier Verification Programme is required.

9 Mitigation Measures

9.1 Mitigation measures

Not applicable; all indicators of the initial risk assessment were determined to be low risk so no mitigation measures are required.

9.2 Monitoring and outcomes

Not applicable; all indicators of the initial risk assessment were determined to be low risk so no mitigation monitoring and outcomes are required.

10 Detailed Findings for Indicators

Detailed findings for each Indicator are given in Annex 1.

11 Review of Report

11.1 Peer review

This Supply Base Report was reviewed, either in total or partially, by the following individuals outside of the GBLLC organization:

- Gary Boyd – Greener Options Inc.

  Gary Boyd is the owner of Greener Options Inc., a sustainability consulting firm that specializes in sustainable forestry certification. He has 30+ years of work experience in the forest products industry including forest management, fiber procurement, wildlife & biodiversity management and environmental management systems. Boyd working in the forest products industry helped develop corporate sustainable forestry certification systems in the mid-1990's. He also represented his company in a number of industry led committees in developing the Sustainable Forestry Initiative (SFI).

  In addition to consulting, Boyd is an accredited ISO 14001 Lead Auditor with two different certification bodies where he conducts forest management, fiber procurement, and chain of custody audits to the various recognized sustainable forestry standards. He has conducted over 370 audits to date.

- Mark Hughes, PhD – Biological Integrity LLC

  Dr. Mark Hughes is the owner of Biological Integrity LLC, a consulting firm specializing in ecosystem and wildlife management. He has 30 years of work experience in studying and researching the taxonomy and ecology of aquatic and terrestrial species. Dr. Hughes has completed numerous risk assessments for clients who are achieving FSC forest management / chain of custody, PEFC chain of custody certification and/or SBP certification.

11.2 Public or additional reviews

No additional reviews were conducted..

12 Approval of Report

Approval of Supply Base Report by senior management			
Report Prepared by:	***Barry Parrish***	***Fiber Procurement and Sustainability Manager***	***7/28/2017***
	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:	***James E. Roecker***	***Chief Executive Officer***	***7/28/2017***
	Name	**Title**	**Date**
Report approved by:	***Mark W. Gaddy***	***VP Operations/Site Manager***	***7/28/2017***
	Name	**Title**	**Date**
Report approved by:	***[Name]***	***[title]***	***[date]***
	Name	**Title**	**Date**

13 Updates

13.1 Significant changes in the Supply Base

Overall BMP compliance reported for 2015 was 91.13% (GA), 99.3% (FL), and 98.2% (AL).

Large landowner percentage changed from 60% to 58%. Small Landowners percentage changed from 40% to 42%.

13.2 Effectiveness of previous mitigation measures

Not applicable; all indicators of the risk assessment were determined to be low risk so no mitigation measures are required.

13.3 New risk ratings and mitigation measures

Not applicable; all indicators of the risk assessment were determined to be low risk so no mitigation monitoring and outcomes are required.

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13.4 Actual figures for feedstock over the previous 12 months

Feedstock

n. Total volume of Feedstock: >1,000, 000 tonnes
o. Volume of primary feedstock: >1,000, 000 tonnes
p. List percentage of primary feedstock (g), by the following categories.
    - Certified to an SBP-approved Forest Management Scheme – 26% (SFI & ATFS)
    - Not certified to an SBP-approved Forest Management Scheme – 74%

q. List all species in primary feedstock, including scientific name

Primary Species:	**Miscellaneous Species (con't):**
Loblolly Pine *(Pinus taeda)*	Hickory (*Carya spp*) Locust (*Robinia spp*)
Longleaf Pine *(Pinus palustris)*	Maple (*Acer spp*)
Slash Pine *(Pinus elliottii)*	Oak (*Quercus spp*)
Miscellaneous Species:	Persimmon (*Diospyros virginiana*)

Pond Pine *(Pinus serotine)*	Red maple (*Acer rubrum*)
Sand Pine *(Pinus clausa)*	Red mulberry (*Morus rubra*)
American beech (*Fagus grandifolia*)	Red oak (*Quercus rubra)*
Ash (*Fraxinus spp*)	River birch (*Betula nigra*)
Basswood, American (*Tilia americana*)	Sassafras (*Sassafras albidum*)
Black cherry (*Prunus serotina*)	Sourwood (*Oxydendrum arboreum*)
Black walnut (*Juglans nigra*)	Sugarberry (*Celtis laevigata*)
Blackgum (*Nyssa sylvatica*)	Sweetgum (*Liquidambar styraciflua*)
Boxelder (*Acer negundo*)	Sycamore (*Platanus occidentalis*)
Buckeye (*Aesculus spp*)	Water oak (*Quercus nigra*)
Eastern cottonwood (*Populus deltoides*)	White oak (*Quercus alba*)
Elm (*Ulmus spp*)	Yellow-poplar (*Liriodendron tulipifera*)
Hackberry (*Celtis occidentalis*)	

r. Volume of primary feedstock from primary forest - None

s. List percentage of primary feedstock from primary forest (j), by the following categories. Subdivide by SBP-approved Forest Management Schemes:
   - Primary feedstock from primary forest certified to an SBP-approved Forest Management Scheme - None
   - Primary feedstock from primary forest not certified to an SBP-approved Forest Management Scheme - None

t. Volume of secondary feedstock:

   Pine Sawmill Chips - 0 – 19%

   Pine Sawmill Sawdust – 0 – 19%

   Pine Sawmill Shavings – 0 – 19%

u. Volume of tertiary feedstock: None

- Banding is used for feedstock volumes because disclosure of the exact figure would reveal commercially sensitive information that could be used by competitors to gain competitive advantage. Feedstock information is commercially sensitive and must be kept confidential due to the close proximity of competitors in the supply base and the strong competition for the feedstock. Increased information in the marketplace would only increase the competition, and may give competitors not bound by similar standards a competitive advantage.

13.5 Projected figures for feedstock over the next 12 months

Feedstock

v. Total volume of Feedstock: >1,000, 000 tonnes

w. Volume of primary feedstock: >1,000, 000 tonnes

x. List percentage of primary feedstock (g), by the following categories.

- Certified to an SBP-approved Forest Management Scheme – 26% (SFI & ATFS)
- Not certified to an SBP-approved Forest Management Scheme – 74%

y. List all species in primary feedstock, including scientific name

Primary Species:	**Miscellaneous Species (con't):**
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Black walnut (*Juglans nigra*)	Sugarberry (*Celtis laevigata*)
Blackgum (*Nyssa sylvatica*)	Sweetgum (*Liquidambar styraciflua*)
Boxelder (*Acer negundo*)	Sycamore (*Platanus occidentalis*)
Buckeye (*Aesculus spp*)	Water oak (*Quercus nigra*)
Eastern cottonwood (*Populus deltoides*)	White oak (*Quercus alba*)
Elm (*Ulmus spp*)	Yellow-poplar (*Liriodendron tulipifera*)
Hackberry (*Celtis occidentalis*)	

z. Volume of primary feedstock from primary forest - None

aa. List percentage of primary feedstock from primary forest (j), by the following categories. Subdivide by SBP-approved Forest Management Schemes:

- Primary feedstock from primary forest certified to an SBP-approved Forest Management Scheme - None
- Primary feedstock from primary forest not certified to an SBP-approved Forest Management Scheme - None

bb. Volume of secondary feedstock:

Pine Sawmill Chips - 0 – 19%

Pine Sawmill Sawdust – 0 – 19%

Pine Sawmill Shavings – 0 – 19%

cc. Volume of tertiary feedstock: None

- Banding is used for feedstock volumes because disclosure of the exact figure would reveal commercially sensitive information that could be used by competitors to gain competitive advantage. Feedstock information is commercially sensitive and must be kept confidential due to the close proximity of competitors in the supply base and the strong competition for the feedstock. Increased information in the marketplace would only increase the competition, and may give competitors not bound by similar standards a competitive advantage.