

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

Fourth Surveillance Audit

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Completed in accordance with the CB Public Summary Report Template Version 1.4

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

Document history

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Table of Contents

1	Overview
2	Scope of the evaluation and SBP certificate
3	Specific objective
4	SBP Standards utilised
4.1	SBP Standards utilised
4.2	SBP-endorsed Regional Risk Assessment
5	Description of Company, Supply Base and Forest Management
5.1	Description of Company
5.2	Description of Company's Supply Base
5.3	Detailed description of Supply Base
5.4	Chain of Custody system
6	Evaluation process
6.1	Timing of evaluation activities
6.2	Description of evaluation activities
6.3	Process for consultation with stakeholders
7	Results
7.1	Main strengths and weaknesses
7.2	Rigour of Supply Base Evaluation
7.3	Compilation of data on Greenhouse Gas emissions
7.4	Competency of involved personnel
7.5	Stakeholder feedback
7.6	Preconditions
8	Review of Company's Risk Assessments
9	Review of Company's mitigation measures
10	Non-conformities and observations
11	Certification recommendation

1 Overview

CB Name and contact: SCS Global Services, 2000 Powell St. Ste 600 Emeryville, CA 94608

Primary contact for SBP: Sarah Harris, SHarris@scsglobalservices.com

Current report completion date: 25/Oct/2019

Report authors: Ciara McCarthy

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 Fourth 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 includes communication of Dynamic Batch Sustainability Data.

The scope of this 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 field audits, site walkthrough of pellet mill and port and interviews with relevant staff. The evaluation included a review of documentation such as the supply base report including the risk assessment, FSC and PEFC DDS, supplier contracts, SAR and SBPD, among others. The BP was also evaluated against Instruction Document 5D on the communication of dynamic batch sustainability data.

3 Specific objective

The specific objective of the annual surveillance audit 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.

*Evaluation against Instruction Document 5D v1.1 on the communication of dynamic batch sustainability 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 publicly 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

Relevant documents and records relating to standards 1, 2, 4, and 5 were reviewed as provided by the organization. The biomass facility was audited between August 6th and 8th, field visits were conducted, and a full system review was completed.

The audit was undertaken over 2 full days, with an additional FMU expert, Mr Norman Boatright, who assessed a number of tracts selected for inspection.

Site Name or Location:	3390 Industrial Blvd. Waycross GA 31503	
Date and Time of Audit:	8am 6 th August 2019	
Auditors	Ciara McCarthy (lead), Norman Boatwright (technical expert)	
Audit Activity	Items to Review / Actions	Approx. Start Time (EST)
Opening meeting	Introductions, auditor review of audit scope, audit plan and intro/update to SBP, FSC, and SCS standards and protocols, client description of organization	8:30am-9:00pm
Start of audit. Audit teams split up. Technical expert (TE): field visits, lead auditor (LA) on-site		
TE: SBP ST 1	Technical expert: field visits, including staff and supplier interviews	9-5pm
LA: SBP ST 5, ID5A, ID5B, & ID5C	Review of energy data collection and interviews with relevant staff	9am-12pm
LA: SBP ST 5, ID5A, ID5B, & ID5C	Continue with review of energy data collection	1-3pm
SBP ST4, review of management system	Review of procedures: Written procedures, work instructions, feedstock description, product group list, accounting system OHSA, training records, interview with personnel, walkthrough of mill. Credit account and conversion factors (if time permits).	3-5pm
Short summary of the day and outlook 2 nd day	Audit team reconvenes at office	5-5:15pm
End day 1		

Site Name or Location:	Offices at pellet mill 3390 Industrial Boulevard 31503 Waycross, GA	
Date and Time of Audit:	August 7, 2019, 8am	
Audit Activity	Items to Review / Actions	Approx. Start Time
Audit teams split up. Technical Expert (TE): field visits, lead auditor (LA) on-site		
TE: SBP ST 1 & ST2	Any remaining field visits	9am-12pm
LA: Evaluation of trademarks	Review of auditor-selected sample of SBP/FSC/PEFC and/or SCS on-product and/or promotional trademark uses; review of	9-9:30am

	any on-site trademark uses such as banners, posters, entryway signs	
LA: SBP ST 4, & 5	Walkthrough of mill, if not already conducted: Review of OHSA, Energy reporting, production	9:30am-12pm
Audit team reconvenes at office		
SBP 2, review of management system	Cont'd: Review of procedures: Written procedures, work instructions, feedstock description, product group list, complaints procedure, management review system, accounting system, training records, interview with personnel.	1– 3pm
SBP ST 4, Review of material balances and records	Auditor-selected sample of the following: material tracking system, summary of purchases and sales, invoices, shipping documents, training records, outsourcing agreements, other applicable SBP/CoC systems, procedures and records, tracebacks from certified outputs to eligible inputs, review of DTS. Auditor-selected sample and verification of calculations for conversion factors, percentage claims, and credit accounts, as applicable, OHSA	1-3pm
Review of previous nonconformities	Review of evidence of corrective actions taken by organization since previous audit (records, documents, pictures, etc.)	3-5pm <i>and in parallel with other audit activities</i>
Short summary of the day and outlook 2 nd day		5-5:15
End day 2		

Site Name or Location:	Offices at pellet mill 3390 Industrial Boulevard 31503 Waycross, GA	
Date and Time of Audit:	August 8, 2019, 9am	
Audit Activity	Items to Review / Actions	Approx. Start Time
SBP ST1, 2, 4 and 5.	Continued as necessary	9am-12pm
Closing meeting and review of findings	Convene with all relevant staff to summarize audit findings, review identified nonconformities, and discuss next steps.	
End audit		

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. The biomass facility was audited between August 6th and 8th, field visits were conducted, and a full system review was completed.

The 0.8 SQRT number of primary and secondary suppliers was calculated. 3 primary supply FMUs were assessed as part of the audit, and 5 secondary/tertiary suppliers and FMUs were additionally assessed. An FMU expert, Mr Norman Boatwright, was a member of the audit team.

6.3 Process for consultation with stakeholders

Stakeholder Consultation by the CB: SCS relies on its Master Stakeholder List, which contains stakeholders that are identified by type, e.g. ENGO, Government/regulatory, Educational/Academic, Industry, Indigenous/Aboriginal/Tribal, etc... This list is categorized by country and state/province at the very least, and for this consultation was filtered to omit any stakeholders that were not geographically relevant to the certificate-holder/applicant's supply base. SCS did not conduct a stakeholder consultation prior to the audit date. No other comments were received or came to the attention of SCS or the auditor.

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.

7.2 Rigour of Supply Base Evaluation

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 5 indicators are specified 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 and mitigation measures. 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	Specified	Specified
2.1.3	Specified	Specified
2.2.1	Low	Low
2.2.2	Low	Low
2.2.3	Specified	Specified
2.2.4	Specified	Specified
2.2.5	Low	Low
2.2.6	Low	Low
2.2.7	Low	Low

Indicator	Risk rating (Low or Specified)	
	Producer	CB
2.3.3	Low	Low
2.4.1	Specified	Specified
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

2.2.8	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

Specified risk was identified for 5 indicators.

Central FL CBA

1. GBLLC has contracted with Greener Options, Inc. to assist in the development and implementation of GBLLC's certification programs. Greener Options, Inc. working with Biological Integrity, LLC attended the three FSC US Controlled Wood Regional meeting held in 2018. Mark Hughes, PhD, owner of Biological Integrity, LLC attended the Southeast Region meeting on July 31, 2018 in Atlanta, GA. Hughes actively participated in the discussion of mitigating measures for the HCVs during this meeting. Gary Boyd, owner of Greener Options, Inc. has reviewed the FSC US Controlled Wood Regional Meeting final report findings with GBLLC specifically on recommended mitigation measures for the Central FL CBA.
2. GBLLC will work with suppliers who source wood fiber from this area to educate their suppliers, their loggers and landowners on the social benefits and values of pine flatwoods, threats from incompatible forest management activities, and opportunities for conservation through management that enhances biodiversity and reduces or eliminates these threats.

Florida Panhandle CBA

1. GBLLC has contracted with Greener Options, Inc. to assist in the development and implementation of GBLLC's certification programs. Greener Options, Inc. working with Biological Integrity, LLC attended the three FSC US Controlled Wood Regional meeting held in 2018. Mark Hughes, PhD, owner of Biological Integrity, LLC attended the Southeast Region meeting on July 31, 2018 in Atlanta, GA. Hughes actively participated in the discussion of mitigating measures for the HCVs during this meeting. Gary Boyd, Greener Options, Inc., has reviewed the FSC US Controlled Wood Regional Meeting final report findings with GBLLC specifically on recommended mitigation measures for the FL Panhandle CBA.
2. GBLLC will work with suppliers who source wood fiber from this area to educate the suppliers, their loggers and landowners on the conservation values of aquatic biodiversity and Native Longleaf Pine Systems, threats from poorly implemented forest management activities, and opportunities for conservation through management practices that reduce or eliminate these threats, including but not limited to forest management activities on steep slopes, and practices that will prevent siltation. This education and outreach measure will be documented using GBLLC-DOC-015 Secondary Supplier Audit Checklists.

Late Successional Bottomland Hardwoods

1. GBLLC has contracted with Greener Options, Inc. to assist in the development and implementation of GBLLC's certification programs. Greener Options, Inc. working with Biological Integrity, LLC attended the three FSC US Controlled Wood Regional meeting held in 2018. Mark Hughes, PhD, owner of Biological Integrity, LLC attended the Southeast Region meeting on July 31, 2018 in Atlanta, GA. Hughes actively participated in the discussion of mitigating measures for the HCVs during this meeting.

Gary Boyd, Greener Options, Inc. has reviewed the FSC US Controlled Wood Regional Meeting final report findings with GBLLC specifically on recommended mitigation measures for LSBH.

2. GBLLC will work with suppliers who source wood fiber from these forest types to educate the suppliers, their loggers and landowners and communicate the social benefits & values of LSBH, threats from forest management activities & related loss of values, and opportunities for conservation through management that restores or maintains LSBH and reduces or eliminates these threats. This education and outreach measure will be documented using GBLLC-DOC-015 Secondary Supplier Audit Checklists.
3. Engage with and/or provide monetary or in-kind resources to conservation organizations or similar entities that are facilitating active, on-the-ground implementation of management activities to restore or maintain existing examples of LSBH, with a goal of long-term conservation of this forest type within the specified risk area and GBLLC's supply area.

Natural Longleaf Pine Systems

1. GBLLC has contracted with Greener Options, Inc. to assist in the development and implementation of GBLLC's certification programs. Greener Options, Inc. working with Biological Integrity, LLC attended the three FSC US Controlled Wood Regional meeting held in 2018. Mark Hughes, PhD, owner of Biological Integrity, LLC attended the Southeast Region meeting on July 31, 2018 in Atlanta, GA. Hughes actively participated in the discussion of mitigating measures for the HCVs during this meeting. Gary Boyd, Greener Options, Inc. has reviewed the FSC US Controlled Wood Regional Meeting final report findings with GBLLC specifically on recommended mitigation measures for the NLPS.
2. GBLLC will work with suppliers who source wood fiber from these areas to communicate and educate suppliers, their loggers and landowners on the social benefits and values of NLPS, threats from forest management and related loss of values, and opportunities for conservation through management that restores or maintains NLPS and reduces or eliminates these threats. Communications should recognize the importance of the forest understory and fire to NLPS. This education and outreach measure will be documented using GBLLC-DOC-015 Secondary Supplier Audit Checklists.
3. GBLLC will engage with and/or provide monetary or in-kind resources to conservation organizations such as the Longleaf Alliance that are facilitating active, on-the-ground implementation of management activities to restore or maintain existing examples of NLPS, with a goal of long-term conservation of this system within the specified risk area and the GBLLC's supply area.

Forestland Conversion

1. GBLLC is developing and implementing binding written agreements with its feedstock suppliers that:
 - a) mitigate the risk that material supplied originates from forest areas converted into plantation or non-forest use; or
 - b) assure that if some conversion has occurred, that material supplied originates from limited and legal sources of conversion (e.g., conversion that results in conservation benefits, publicly approved changes in zoning in urban areas, etc.) and does not come from sources where the conversion threatens High Conservation Values.
2. GBLLC has contracted with Greener Options, Inc. to assist in the development and implementation of GBLLC's certification programs. Greener Options, Inc. working with Biological Integrity, LLC attended the three FSC US Controlled Wood Regional meeting held in 2018. Mark Hughes, PhD, owner of Biological Integrity, LLC attended the Southeast Region meeting on July 31, 2018 in Atlanta, GA. Hughes actively participated in the discussion of mitigating measures for the HCVs during this meeting. Gary Boyd, Greener Options, Inc. has reviewed the FSC US Controlled Wood Regional Meeting final report findings with GBLLC specifically on recommended mitigation measures for forestland conversion.

3. GBLLC will work with suppliers who source wood fiber from these 10 counties to communicate and educate suppliers, their loggers and landowners on the social benefits of keeping forests as forests, and the value-enhancing alternatives to conversion and opportunities for the maintenance of forests. This education and outreach measure will be documented using GBLLC-DOC-015 Secondary Supplier Audit Checklists.
4. GBLLC will also maintain membership in the Georgia Forestry Association to keep abreast of forestry issues within GBLLC's supply area. Below are some sources of information used to educate suppliers and their loggers, and landowners of forest conservation.

IUCN Centres for Plant Diversity (CPD)

1. NA24 - Piedmont granitic rock outcrops
 - 1.1. It is unlikely that commercial timber harvesting will occur on these granite rock outcrop sites.
 - 1.2. GBLLC will work with suppliers who source wood fiber from these areas to educate the suppliers, their loggers and landowners on the conservation values of granite rock outcrops and the rare plants that may occur on these sites. Emphasis will be placed on educating suppliers not to use these areas as loading decks or landings for timber harvesting operations. This education and outreach measure will be documented using GBLLC-DOC-015 Secondary Supplier Audit Checklists.
2. NA25 – Eastern Serpentine flora
 - 2.1. It is unlikely that commercial timber harvesting will occur on these serpentine soils.
 - 2.2. GBLLC will work with suppliers who source wood fiber from these areas to educate the suppliers, their loggers and landowners on the conservation values of the rare plants that may occur on these sites. Emphasis will be placed on educating suppliers not to use these areas as loading decks or landings for timber harvesting operations. This education and outreach measure will be documented using GBLLC-DOC-015 Secondary Supplier Audit Checklists.
3. NA28 – The Apalachicola River drainage
 - 3.1. The habitat for the site is described as steep-sloped ravines dropping into wetlands. Given this steep topography commercial timber harvesting is restricted from this CPD site.
 - 3.2. There is a strong system of protection (effective protected areas and legislation) in place within the GBLLC district of origin that ensures survival of this HCV. According to the Protected Areas Database of the United States (PAD-US) the area of the GBLLC supply area that is within the FL Panhandle CBA, which includes this CPD site, contains 27.75% protected areas.
 - 3.3. This CPD site is within the FL Panhandle CBA. The mitigation measures described for the FL Panhandle will also be used for this site.
4. NA29 - The Central Highlands of Florida
 - 4.1. The habitat for this CPD site includes deep sands that are not conducive to commercial forestry practices. Sand pine is the most common overstory species in forested areas. Sand pine is not a primary commercial species due to its small size.
 - 4.2. The location of this CPD site makes it economically impossible to deliver this sand pine to GBLLC. Secondary fiber that may come from this area is from residual chips from pine sawmills. Sawmills do not cut sand pine for lumber.

Alliance for Zero Extinction

1. The habitat for the site is described as steep-sloped ravines dropping into wetlands. Given this steep topography commercial timber harvesting is restricted from this AZE site.

2. There is a strong system of protection (effective protected areas and legislation) in place within the GBLLC district of origin that ensures survival of this HCV. According to the Protected Areas Database of the United States (PAD-US) the area of the GBLLC supply area that is within the FL Panhandle CBA, which includes this AZE site, contains 27.75% protected areas.
3. This AZE site is within the FL Panhandle CBA. The mitigation measures described for the FL Panhandle will also be used for this site.

GreenPeace Intact Forest

1. There is a strong system of protection (effective protected areas and legislation) in place within the GBLLC district of origin that ensures survival of this intact forest.
2. No wood is harvested out of the described National Wilderness Area which is managed by the Department of Interior. If wood is harvested from the surrounding forests described above, The Department of Interior or the Georgia Forestry Commission conducts environment impact studies and oversees all timber harvesting on these forests within the HCV providing complete protection of the site.

World Wildlife Fund (WWF), Global 200 Ecoregions

1. Southeastern mixed forests (NA0413)
 - 1.1. WWF has declared more than 99% of this ecoregion having been converted. The remaining examples within this ecoregion are known to occur on protected lands.
2. Southeastern conifer forests (NA0529)
 - 2.1. This ecoregion is within the Native Longleaf Pine Systems (NLPS) area. The mitigation measures described for NLPS will also be used for this site.

Mitigation has been implemented. Monitoring occurs during annual supplier audits and documented using GBLLC-DOC-015 Secondary Supplier Audit Checklists.

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.

10.1 Previous NCs closed during the audit:

NC number 2018.7	NC Grading: Major
Standard & Requirement:	SBP ST 1, 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:	Other 29 September 2019
Evidence Provided by Company to close NC:	The BP sent an email to all suppliers explaining the importance of biomass retention. The publication entitled “Forest Biomass Retention and Harvesting Guidelines for the Southeast” was attached.
Findings for Evaluation of Evidence:	The organization submitted an email record, showing that the guidelines have been sent out to suppliers and an email distribution list in spreadsheet format. CAR is closed.
NC Status:	Closed

NC number 2018.8	NC Grading: Major
Standard & Requirement:	SBP ST 1, 2.7
Description of Non-conformance and Related Evidence:	
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.	

Timeline for Conformance:	Other 29 September 2019
Evidence Provided by Company to close NC:	SBE was revised, including some risk designations.
Findings for Evaluation of Evidence:	The BP has revised its SBE to reflect the facility receiving more secondary and tertiary feedstocks since the last surveillance. This revised assessment has also reflected in the BP modifying its risk designations. CAR is closed.
NC Status:	Closed

11 Certification decision

Based on the auditor's recommendation and the Certification Body's quality review, the following certification decision is taken:

Certification decision:	Certification approved
Certification decision by (name of the person):	Sebastian Häfele
Date of decision:	10/Dec/2019
Other comments:	<i>Click or tap here to enter text.</i>