

# SCS Global Services Evaluation of LJR Forest Products 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 1.4

*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, 2000 Powell St. Ste 600 Emeryville, CA 94608

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

Current report completion date: 05/Apr/2019

Report authors: David White (Lead Auditor)

Name of the Company: LJR Forest Products

Company contact for SBP: Mr. Lige Moore, Ljr04@yahoo.com

Certified Supply Base: Selected Counties in Georgia and South Carolina

SBP Certificate Code: SBP-04-22

Date of certificate issue: 29/Dec/2017

Date of certificate expiry: 27/Nov/2021

This report relates to the Third Surveillance Audit

## 2 Scope of the evaluation and SBP certificate

The manufacture of wood pellets and transport by truck to the ports of Brunswick and Savannah, Georgia including Standards 1,2,4 and 5 for the Swainsboro, Georgia facility. The scope includes a Supply Base Evaluation for the states of Georgia and South Carolina, and communication of the dynamic batch sustainability data.

### 3 Specific objective

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

The following critical control points were identified and audited:

Supply Base Evaluation

Feedstock Procurement

Receiving of Feedstock

Documentation of Transactions

ID5D: Dynamic Batch Sustainability Data v1.1 evaluation

## 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

LJR Forest Products supplies wood fiber to its pellet mill located in Swainsboro, Georgia. Material is sourced as pine sawmill residuals from the states of Georgia and South Carolina. The procurement organization consists of a single procurement manager. LJR Forest Products sources 100% of its input material as pine sawmill residuals. Approximately 51% as green chips, 11% as green sawdust and the remaining as dry shavings. The sawmills that supply the LJR Forest Products pellet facility are not CoC certified so all the input material is FSC/PEFC controlled. Outputs are SBP Compliant Biomass and EUTR Compliant Biomass.

### 5.2 Description of Company's Supply Base

LJR Forest Products' wood pellet production plant is located in Swainsboro, Georgia. The facility sources from a largely rural area where forestry and agriculture are prevalent and are the primary sources of income for workers and the local communities. The supply base consists of pine forests in the Piedmont, South Atlantic Coastal Plain and the Mid-Atlantic Coastal Plain Regions. No hardwoods are sourced. LJR Forest Products utilizes 100% mill residuals to produce its industrial wood pellets. Softwood mill residual chips, shavings, and sawdust originate from primary solid wood manufacturing facilities. The wood fiber inputs originate predominately from southern Georgia and western South Carolina. No hardwood residuals are utilized, and no hardwood harvesting contributes to LJR's fiber supply. LJR Forest Products' facility does not utilize any construction, demolition or post-consumer derived feedstocks. The States of Georgia and South Carolina have large and well-funded State Forestry Commissions and agencies that administer a number of programs including: timber theft prevention, landowner outreach and extension, forest inventory and analysis, forest fire and pest prevention, smoke management, health and safety, conservation easement, BMP implementation and monitoring, forest resource and wildlife assessments and action plans, and other forest sustainability programs. The company sources Pine sawmill residuals from approximately fourteen (16) suppliers. Secondary feedstock will account for 100% of the total feedstock.

### 5.3 Detailed description of Supply Base

#### Supply Base

- a. Total Supply Base area (ha): 10,007,260 ha Georgia, 5,250,458 ha South Carolina
- b. Tenure by type (ha): 8,930,272 ha Private Land – Georgia, 1,076,988 ha Public Agencies – Georgia, 4,604,628 ha Private Land – South Carolina, 645,830 ha Public Agencies – South Carolina
- c. Forest by type (ha): 4,488,804 ha Temperate Pine Forests – Georgia, 1,105,434 ha Temperate Oak-Pine – Georgia, 2,516,234 ha Temperate Pine Forests – S Carolina, 593,837 ha Temperate Oak-Pine – S Carolina
- d. Forest by management type (ha): 3,127,355 ha Planted Forest – Georgia, 6,879,904 ha Managed Natural Forest – Georgia, 1,345,347 ha Planted Forest – South Carolina, 3,905,111 ha Managed Natural Forest – S Carolina
- e. Certified forest by scheme (ha): SFI Georgia 957,162 ha  
South Carolina 455,989 ha



FSC Georgia 70,376 ha  
South Carolina 64,1773 ha  
ATFS Georgia 1,208,350 ha  
South Carolina 539,282 ha

#### Feedstock

- f. Total volume of Feedstock: tonnes or m<sup>3</sup> – 0-200,000 tonnes
- g. Volume of primary feedstock: tonnes or m<sup>3</sup> -0 metric tons
- h. List percentage of primary feedstock (g), by the following categories. Subdivide by SBP-approved Forest Management Schemes:
  - Certified to an SBP-approved Forest Management Scheme
  - 0%--No Certified Forest Content is reported
  - Not certified to an SBP-approved Forest Management Scheme
  - 0%--No Certified Forest Content is reported
- i. List all species in primary feedstock, including scientific name
  - Loblolly pine      Pinus taeda
  - Longleaf pine      Pinus palustris
  - Slash pine      Pinus elliottii
  - Sand pine      Pinus clausa
  - Pond pine      Pinus serotina
  - Spruce pine      Pinus glabra
- j. Volume of primary feedstock from primary forest
  - 0% (No primary forests are harvested)
- 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. 0%
  - Primary feedstock from primary forest not certified to an SBP-approved Forest Management Scheme. 0%
- l. Volume of secondary feedstock: specify origin and type - the volume may be shown as a % of the figure in (f) if a compelling justification is provided- 187,200 tonnes of sawmill residuals
- m. Volume of tertiary feedstock: specify origin and composition - the volume may be shown as a % of the figure in (f) if a compelling justification is provided. 0%

## 5.4 Chain of Custody system

LJR Forest Products is independently certified to the FSC/PEFC Chain of Custody and Controlled Wood Standards. LJR Forest Products sources all indirect and secondary inputs from suppliers that are within scope of the FSC/PEFC Chain of Custody and Controlled Wood/Due Diligence Standards. The COC certificate is single site. Pellets are manufactured at the facility and trucked to ports in Brunswick and Savannah, Ga. Ownership of the pellets transfers to another entity when the trucks are unloaded at the port.

## 6 Evaluation process

### 6.1 Timing of evaluation activities

| Date                | Location/Method   | Activity   | Participants   |
|---------------------|---|--|--|
| 26-28 February 2019 | Planning Call, Document Review  | Develop Audit Plan, Confirm Audit Dates, RFI's                           | David White, Lige Moore                                      |
| 26-29 March 2019    | LJR Facility/On-site Interviews, Documentation Review, Observations, Site Visits, Supplier Interviews | Surveillance Audit to Standards 1, 2, 4, 5                               | Lige Moore, David White, Kyle Meister, Selected Interviewees |
| 1-2 April 2019      | Complete RFI, Write Reports   | Surveillance Audit Reports addressing evaluation of Standards 1, 2, 4, 5 | Lige Moore, David White, Kyle Meister                        |

### 6.2 Description of evaluation activities

SCS Global Services initiated the SBP audit process with a planning call to confirm the scope of the audit, determine whether any changes had occurred in the Company's policies and procedures and set the audit dates. SCS Global Services then prepared a detailed audit plan and conducted the SBP Surveillance Audit of conformance to the SBP Standards with focus on the SBE/SBR and chain of custody requirements.

The audit was governed by a detailed audit plan designed to enable the audit team to efficiently determine conformance with the applicable SBP requirements. The plan provided for the assembly and review of audit evidence consisting of documents, interviews, and on-site inspections of ongoing or completed forest practices and management systems.

During the audit samples of the written documentation assembled to provide objective evidence of SBP Conformance were reviewed. SCS Global Services also selected field sites for inspection based upon the risk of environmental impact, likelihood of occurrence, special features, and other criteria.

The possible findings of the audit included Full Conformance, Major Non-conformance, Minor Non-conformance and Opportunities for Improvement.

### 6.3 Process for consultation with stakeholders

Stakeholders were not engaged as this is a surveillance audit and no SBP related complaints were identified.

## 7 Results

### 7.1 Main strengths and weaknesses

LJR Forest Products is certified to the FSC/PEFC Chain of Custody Standards and the FSC Controlled Wood and PEFC Controlled Sourcing Standards. Accordingly, it has developed and refined its procedures to enable it to track fiber from the district or origin and throughout the supply system and manufacturing process. Due to certification to the referenced standards, LJR Forest products has already implemented mitigation measures. Strengths include the ability to track residual material back to the source manufacturing facility. LJR's defined supply basin extends well beyond the normally accepted haul radii for its residual supplier mills to ensure the district of origin of the fiber is within the supply basin. LJR Forest products has exhibited a strong corporate commitment to source fiber sustainably. Reference nonconformances below for detailed description of weaknesses.

### 7.2 Rigour of Supply Base Evaluation

LJR forest products has conducted a rigorous Supply Base Evaluation. Risk was designated low for all core indicators as existing mitigation measures are in place. Due to its previous certifications, LJR Forest Products had already built mitigation measures into its procedures and fiber sourcing programs. In addition, LJR Forest Products has chosen to define the geographical scope of the SBE to extend well beyond the normally accepted haul radii for its residual supplier mills to ensure the district of origin of the fiber is within the supply basin.

### 7.3 Collection and Communication of Data

LJR Forest Products GHG data is complete and accurate and overall the company is well capable of gathering and organizing the required information.

### 7.4 Competency of involved personnel

LJR Forest products retained R.S. Berg & Associates, Inc. to prepare the SBP Program and Procedures, including conducting the Supply Base Evaluation & Risk Assessment. R.S. Berg & Associates, Inc, has provided consulting assistance to over two hundred and eighty (280) forestry organizations in North America and has conducted over forty (40) independent and internal audits to the FSC, SFI, PEFC and American Tree Farm System Standards. Resume, Client List and other information is available at the following website: <http://www.rsbergassoc.com/>. LJR Forest products management and control systems for SBP are the same as those used to meet the FSC/PEFC Chain of Custody and FSC Controlled Wood requirements, which have been in place since 2015. Key personnel tasked with implementing LJR Forest Products management and control systems relating to SBP compliance are well trained and competent. Their knowledge of SBP requirements is strong.

## 7.5 Stakeholder feedback

Stakeholders were not engaged as this is a surveillance audit. LJR Forest products has not received any complaints relative to SBP.

## 7.6 Preconditions

Not applicable – surveillance audit.

## 8 Review of Company’s Risk Assessments

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

| Indicator | Risk rating<br>(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<br>(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 |

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

| Indicator | Risk rating<br>(Low or Specified) |           |
|-----------|-----------------------------------|-----------|
|           | Producer                          | CB        |
| 1.1.1     | Low                               | Low       |
| 1.1.2     | Low                               | Specified |
| 1.1.3     | Low                               | Specified |
| 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                               | Specified |
| 2.1.2     | Low                               | Specified |
| 2.1.3     | Low                               | Low       |
| 2.2.1     | Low                               | Specified |
| 2.2.2     | Low                               | Specified |
| 2.2.3     | Low                               | Specified |
| 2.2.4     | Low                               | Specified |
| 2.2.5     | Low                               | Specified |
| 2.2.6     | Low                               | Specified |
| 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<br>(Low or Specified) |           |
|-----------|-----------------------------------|-----------|
|           | Producer                          | CB        |
| 2.3.3     | Low                               | Low       |
| 2.4.1     | Low                               | 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       |

## 9 Review of Company's mitigation measures

Due to the exiting FSC Controlled Wood and PEFC Controlled Material certifications, the Company had already implemented mitigation measures to bring all indicators to low risk. These exiting mitigation measures include the use of a Wood Purchase Agreement that all suppliers must sign and the supplier audit program. The Agreement has a clause that prohibits the supplier from obtaining fiber from land with high biodiversity value, high carbon stock or peat land where those values could be significantly threatened.

## 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>   | <b>SB SBP Standard 1; 1.1.1</b>   |
| <b>Description of Non-conformance and Related Evidence:</b> The current Supply Base map is on a very small scale with locations and counties difficult to distinguish. |   |
| <b>Evidenced by review of current Supply Base map.</b>   |   |
| <b>Timeline for Conformance:</b>   | Other   |
| <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>  | <b>SBP Standard 1, 1.1.2; 1.3.1; 2.1.2; 2.2.1; 2.2.2; 2.2.5; 2.2.6; 2.4.1</b> |
| <b>Description of Non-conformance and Related Evidence:</b> 1.1.2, 1.3.1, 2.1.2, 2.2.1, 2.2.2, 2.2.5, 2.2.6, 2.4.1 During 2018 10 of the 16 suppliers to LJR Forest Products did not receive DOO audits. The files of the six visits reviewed did not contain any evidence of scale ticket verification (scale-house visit, location of tree stumps) or on-site audits to harvesting operations. Checklists reviewed on these six visits did not include supporting comments. |   |
| <b>Evidenced by review of the Supply Base Evaluation and Risk Assessment; Supply Base Report Annex 1.</b>   |   |



|  |   |
|--|---|
| <b>Timeline for Conformance:</b>                 | 3 months from the report finalisation   |
| <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 3</b>   | <b>NC Grading: Major</b>  |
| <b>Standard &amp; Requirement:</b>   | <b>SBP Standard 1: 2.1.1; 2.2.3;2.2.4</b>   |
| <b>Description of Non-conformance and Related Evidence: 2.1.1; 2.2.3; 2.2.4; No evidence was produced during this audit that HCV's within the Supply Base have been identified and mapped.</b> |   |
| <b>Evidenced by the Supply Base Evaluation and Risk Assessment; Supply Base Report Annex 1.</b>  |   |
| <b>Timeline for Conformance:</b>   | 3 months from the report finalisation   |
| <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 4</b>  | <b>NC Grading: Minor</b>  |
| <b>Standard &amp; Requirement:</b>  | <b>SBP Standard 5a 6.1</b>  |
| <b>Description of Non-conformance and Related Evidence: When calculating the electrical consumption, July 2018 data was inputted incorrectly overstating electrical consumption</b> |   |
| <b>Evidenced : When data input was corrected, electrical consumption moved from 162.22 kWh/metric tonne pellets to 161.77 kWh/metric tonne pellets.</b>                             |   |
| <b>Timeline for Conformance:</b>  | By the next surveillance audit, but no later than 12 months from report finalisation date |

|   |  |
|---|--|
| Evidence Provided by Company to close NC: | When data input was corrected, electrical consumption moved from 162.22 kWh/metric tonne pellets to 161.77 kWh/metric tonne pellets. |
| Findings for Evaluation of Evidence:      | When data input was corrected, electrical consumption moved from 162.22 kWh/metric tonne pellets to 161.77 kWh/metric tonne pellets. |
| NC Status:                                | Closed   |

|   |   |
|---|---|
| NC number 5   | NC Grading: Observation   |
| Standard & Requirement:   | SBP Standard 5a 1.1   |
| <b>Description of Non-conformance and Related Evidence:</b> There are currently no written procedures for moisture sampling of incoming loads of dust, shavings, and chips.   |   |
| <b>Evidence:</b> Moisture sampling of incoming loads was observed as a part of this audit. Moisture samples were observed being taken correctly. Based upon an interview with Jamie Manghum, who was taking the moisture samples, the samples are taken by a total of 5 employees in a given week (same 5 employees). Every load of shavings, every load of sawdust, and 5 loads per shift of chip moisture samples are taken. In addition, the sampling gun was noted as being calibrated against moisture data of the sawdust and chips as they exit the dryer, however there is no written instructions on calibration, including how often to calibrate, or when the gun should have preventative maintenance checks. |   |
| Timeline for Conformance:   | Other   |
| Evidence Provided by Company to close NC:   | <i>Click or tap here to enter description provided by Company to close the NC.</i>    |
| Findings for Evaluation of Evidence:  | <i>Click or tap here to enter findings for evaluation of evidence by the auditor.</i> |
| NC Status:  | Open  |

|   |   |
|---|---|
| NC number 6   | NC Grading: Major   |
| Standard & Requirement:   | SBP Standard ID5A,4.1/4.2/4.3 All transactions have been recorded in the DTS. |
| <b>Description of Non-conformance and Related Evidence:</b> All transactions have not been recorded in DTS. |   |

|  |   |
|--|---|
| <b>Evidence of Nonconformance:</b> LJR Forest Products facility report for 2018 shows shipments of 141,581 MT's verses DTS Combined Report shipment of 117,228 MT's. |   |
| <b>Timeline for Conformance:</b>   | 3 months from the report finalisation   |
| <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 7</b>  | <b>NC Grading: Minor</b>  |
| <b>Standard &amp; Requirement:</b>  | <b>SBP Standard 5a 1.1</b>  |
| <b>Description of Nonconformance</b> Adequate data has not been evidenced to confirm annual usage of diesel and propane.  |   |
| <b>Evidence of Nonconformance:</b> Monthly data collection of propane and diesel usage is based upon consumption. When invoices were collected for the months of January, March, July and October, evidence was not adequate to confirm the annual usage numbers. An RFI for all months of Diesel and Propane has been requested of Lige Moore (as of April 6, 2019). |   |
| <b>Timeline for Conformance:</b>  | By the next surveillance audit, but no later than 12 months from report finalisation date |
| <b>Evidence Provided by Company to close NC:</b>  | All requested data provided.  |
| <b>Findings for Evaluation of Evidence:</b>   | Annual usage numbers were confirmed.  |
| <b>NC Status:</b>   | Closed  |

## 11 Certification decision

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

|  |   |
|--|---|
| <b>Certification decision:</b>                         | Certification approved                          |
| <b>Certification decision by (name of the person):</b> | Ciara McCarthy                                  |
| <b>Date of decision:</b>                               | 26/Jul/2019                                     |
| <b>Other comments:</b>                                 | 4 major and 2 minor non-conformities identified |