SBP

Sustainable Biomass Program

Supply Base Report: Georgia Biomass LLC

Fourth Surveillance Audit

www.sbp-cert.org

Completed in accordance with the Supply Base Report Template Version 1.3

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

Document history

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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) 490-5293 barry.Parrish@gabiomass.com
Company website:	www.gabiomass.com
Date report finalised:	6/Aug/2019
Close of last CB audit:	9/Aug/2019
Name of CB:	SCS Global
Translations from English:	Yes
SBP Standard(s) used:	Standard 1 version 1.0, Standard 2 version 1.0, Standard 4 version 1.0, Standard 5 version 1.0
Weblink to Standard(s) used:	https://sbp-cert.org/documents/standards-documents/standards
SBP Endorsed Regional Risk Assessment:	NA
Weblink 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 one hundred sixty one (161) counties (21,645,034 hectares) in Alabama (AL), Florida (FL), Georgia (GA) and South Carolina (SC) within the United States. Forests are the predominant land use in this supply base (67%) Pine forests comprise the largest forest type (49.7%) of the supply area's forest followed by hardwood forests (37.7%). The pine/oak forest comprises 10.5% of the supply area's forest type while 2.1% of the forest is considered non-stocked. About 63% of the supply area's forests are managed as natural forests (9.073 MM hectares) while the remaining 35% of the supply area's forests are artificially regenerated (5.113 MM hectares).

GBLLC purchases its fiber primarily from private landowners. Small landowners provide 55% of the fiber furnish while large private landowners provide the remaining 45%. 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 the states generating $18.5 billion industry in AL (2016), $16.09 billion industry in FL (2014), $21.3 billion industry in GA (2017) and $21 billion industry in SC annually (2017). 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 AL was 98.2% (2016), FL was 99.6% (2017), GA was 93.17% (2017), and SC was 95.5% (2016).

Sustainable forestry certification is present in GBLLC's supply with the company purchasing 43% of its fiber as certified (SFI – 30% and ATF – 13%). No FSC certified fiber has been purchased to date.

GBLLC purchases pine and hardwood roundwood and in-woods chips as its primary feedstock from about 38 wood suppliers. Secondary feedstock is received in the form of pine and hardwood residual chips, sawdust and shavings from about 40 secondary sawmill and tertiary suppliers. Primary feedstock accounts for 69% of the total feedstock. Secondary feedstock from chips, sawdust & shavings account for 30% of the total feedstock. Tertiary feedstock accounts for about 1% of the total feedstock.

2.2 Actions taken to promote certification amongst feedstock supplier

GBLLC is certified to the SFI Standard (BV-SFIS-US007165-1) as well as the FSC (BV-COC-010747), SFI (BV-SFICOC-US004140-1) and PEFC (BV-PEFCCOC-US004141-1) 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.

During 2018-2019 approximately 75% of GBLLC's roundwood came from final fellings. The other 25% originated from thinnings. The typical rotation age of final fellings in the region is approximately 25 years.

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

2.5 Quantification of the Supply Base

Supply Base

a. Total Supply Base area (ha): 21,645,034 ha / 14,502,379 ha (Forested lands)
b. Tenure by type (ha): Privately owned (12,374,469 ha) / Public (2,127,910 ha)
c. Forest by type (ha): Temperate (14,502,379 ha)
d. Forest by management type (ha): Plantation (5,113,316 ha) / Managed Natural (9,073,146 ha) / Natural (315,917 ha)
e. Certified forest by scheme (ha):

Cert Hectares by Standard by State					
	AL	FL	GA	SC	Total
ATF	22,312	11,858	26,923	5,950	67,042
FSC	271,512	51,154	33,023	132,453	488,142
SFI	1,179,130	713,185	939,249	427,579	3,259,143
					3,814,327

Feedstock

f. Total volume of Feedstock: >1,000, 000 tonnes
g. Volume of primary feedstock: 800,000 – 1,000,000 tonnes
h. List percentage of primary feedstock (g), by the following categories.
   - Certified to an SBP-approved Forest Management Scheme - 47% (SFI & ATFS)
   - Not certified to an SBP-approved Forest Management Scheme – 53%
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 0 tonnes

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 tonnes
   - Primary feedstock from primary forest not certified to an SBP-approved Forest Management Scheme 0 tonnes

l. Volume of secondary feedstock: specify origin and type - the volume may be shown as a % of the figure in (f) and percentages may be shown in a banding between XX% to YY% if a compelling justification is provided*.

Chips	0-19%
Sawdust	0-19%
Shavings	0-19%

m. Volume of tertiary feedstock: specify origin and composition - the volume may be shown as a % of the figure in (f) and percentages may be shown in a banding between XX% to YY% if a compelling justification is provided*.

Sawdust	0-19%
Shavings	0-19%

* 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	☐

4 Supply Base Evaluation

4.1 Scope

The scope of the supply base evaluation is to determine the level of risk as compared to the indicators of SBP Framework Standard 1: Feedstock Compliance Standard. The scope of the evaluation covered the supply area for the pellet mill including all existing sources of primary, secondary and tertiary feedstocks, as well as the feedstocks' point of origination. The evaluation is consistent with GBLLC's due diligence processes and risk assessment for FSC Controlled Wood.

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. The FSC US Controlled Wood National Risk Assessment (US NRA) was used as a baseline to determine if areas of high conservation value, biodiversity and conversion exist in GBLLC's supply base area. This assessment also reviewed applicable laws and regulations and forestry best management practices, analysed high conservation areas from other conservation perspectives 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 with the exception of indicators 2.1.2, 2.1.3, 2.2.3, 2.2.4 and 2.4.1. 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 are no indicators determined to be "unspecified risk".

4.5 Conclusion

Based on the results of the supply base evaluation there is low risk to all indicators SBP Framework Standard 1: Feedstock Compliance except for indicators 2.1.2, 2.1.3, 2.2.3, 2.2.4 and 2.4.1, which are determined to be "specified risk" and will require mitigation measures to lower this identifed risk.

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 Forest Inventory & Analysis (FIA) 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, secondary & tertiary feedstock suppliers to ensure the complete geography of the supply area. The suppliers and sub-suppliers identified were located using GIS technology. Their estimated supply area was determined through interviews with these suppliers to establish the counties they source from or a sixty (60) mile delivery radius was established for each supplier. The accumulation of these feedstock supplier areas was then used to identify the origin of wood fiber by states and counties from which GBLLC purchases wood fiber. USDA Forest Service FIA 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 FSC, 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 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, the species they purchase for their operations and if they purchase any fiber from areas considered to have "specified risk". These annual audits are documented on GBLLC-DOC-015 Secondary Supplier Audit Checklist.

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.

No complaints or feedback from stakeholders has been received sonce the previous surveillance audit.

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 or specified risk and no unspecified risk was identified. No Supplier Verification Programme is required.

8.2 Site visits

Not applicable.

8.3 Conclusions from the Supplier Verification Programme

Not applicable.

9 Mitigation Measures

9.1 Mitigation measures

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.

9.2 Monitoring and outcomes

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

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 35 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 500 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 35 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 J. Parrish***	***Director of Procurement & Sustainability***	***August 5, 2019***
	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:	***Mark Gaddy***	***Managing Director/COO***	***August 6, 2019***
	Name	**Title**	**Date**
Report approved by:	***Fabian Gaus***	***Managing Director/CFO***	***August 6, 2019***
	Name	**Title**	**Date**
Report approved by:	***Lisa Voytko***	***Director of HR & Admin***	***August 6, 2019***
	Name	**Title**	**Date**

13 Updates

13.1 Significant changes in the Supply Base

GBLLC has increased the volume of secondary and tertiary feedstock and decreased the volume of primary feedstock usage since the previous surveillance audit. As a result the company's supply area has has expanded from 128 counties in 3 states to 161 counties in 4 states (AL - 9 counties; FL - 30 counties; GA - 104 counties; SC - 18 counties). The company's risk assessment was revised as part of its due diligence system to evaluate these additional counties and state.

13.2 Effectiveness of previous mitigation measures

Mitigation measures have only recently ben implemented. Theie effectiveness has not been evaluated.

13.3 New risk ratings and mitigation measures

Indicators 2.1.2, 2.1.3, 2.2.3, 2.2.4 and 2.4.1 of SBP Framework Standard 1: Feedstock Compliance have been evaluated to be specified risk.

13.4 Actual figures for feedstock over the previous 12 months

a. Total volume of Feedstock: >1,000, 000 tonnes
b. Volume of primary feedstock: 800,000 – 1,000,000 tonnes
c. List percentage of primary feedstock (g), by the following categories.
    a. Certified to an SBP-approved Forest Management Scheme - 47% (SFI & ATFS)
    b. Not certified to an SBP-approved Forest Management Scheme – 53%
d. 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*)	

e. Volume of primary feedstock from primary forest 0 tonnes

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

   a. Primary feedstock from primary forest certified to an SBP-approved Forest Management Scheme 0 tonnes

   b. Primary feedstock from primary forest not certified to an SBP-approved Forest Management Scheme 0 tonnes

g. Volume of secondary feedstock: specify origin and type - the volume may be shown as a % of the figure in (f) and percentages may be shown in a banding between XX% to YY% if a compelling justification is provided*.

Chips	0-19%
Sawdust	0-19%
Shavings	0-19%

h. Volume of tertiary feedstock: specify origin and composition - the volume may be shown as a % of the figure in (f) and percentages may be shown in a banding between XX% to YY% if a compelling justification is provided*.

Sawdust	0-19%
Shavings	0-19%

* 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

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

b. Volume of primary feedstock: 800,000 – 1,000,000 tonnes

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

   a. Certified to an SBP-approved Forest Management Scheme – 45% (SFI & ATFS)

   b. Not certified to an SBP-approved Forest Management Scheme – 55%

d. 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*)	

e. Volume of primary feedstock from primary forest 0 tonnes

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

   a. Primary feedstock from primary forest certified to an SBP-approved Forest Management Scheme 0 tonnes

   b. Primary feedstock from primary forest not certified to an SBP-approved Forest Management Scheme 0 tonnes

g. Volume of secondary feedstock: specify origin and type - the volume may be shown as a % of the figure in (f) and percentages may be shown in a banding between XX% to YY% if a compelling justification is provided*.

Chips	0-19%
Sawdust	0-19%
Shavings	0-19%

h. Volume of tertiary feedstock: specify origin and composition - the volume may be shown as a % of the figure in (f) and percentages may be shown in a banding between XX% to YY% if a compelling justification is provided*.

Sawdust	0-19%
Shavings	0-19%

* 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.

Annex 1: Detailed Findings for Supply Base Evaluation Indicators

	Indicator
1.1.1	The Biomass Producer's Supply Base is defined and mapped.
Finding	Company's Supply Base is defined and mapped. GBLLC developed a list of current primary, secondary & tertiary wood fiber feedstock suppliers. The suppliers and sub-suppliers identified were located using GIS technology. Their estimated supply area was determined through interviews with these suppliers to establish the counties they source from or a sixty (60) mile delivery radius was established for each supplier. The accumulation of these feedstock supplier areas was then used to identify the origin of wood fiber by states and counties from which GBLLC purchases wood fiber. The map is defined by the present and projected future needs of the plant and includes identified secondary feedstock suppliers.
Means of Verification	GBLLC-DOC-016 Tract Inspection Form for primary feedstock & GBLLC-DOC-015 Secondary Supplier Audit Checklist for secondary & tertiary feedstock verify the origin of feedstock through these in the field or supplier audits.
Evidence Reviewed	• GBLLC-DOC015 Secondary Supplier Audit Checklist • GBLLC-DOC-016 Tract Inspection Form • GBLLC-DOC-018 FSC Controlled Wood/PEFC Due Diligence Risk Assessment
Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
1.1.2	Feedstock can be traced back to the defined Supply Base.
Finding	Primary feedstock can be traced back to the defined Supply Base through scale ticket documentation and Log Inventory and Management System (LIMS) records where each authorization card & scale ticket defines the county and state that feedstock originates. Secondary & tertiary feedstock can be traced to the supplier location from which the residual feedstock was produced. Fiber contracts document the location of these sawmills. Communications with secondary & tertiary feedstock suppliers confirms feedstock originates from within the GBLLC supply base and is recorded using the GBLLC-DOC-015 Secondary Supplier Audit Checklist. Traceability is enforced by Company policies and procedures.
Means of Verification	Company procedures, records in wood inventory system and communications with suppliers
Evidence	• GBLLC-PROC-001 Chain of Custody Procedures

Reviewed	• GBLLC-PROC-002 SFI Fiber Sourcing Procedures • GBLLC-PROC-003 FSC Controlled Wood/PEFC Due Diligence System Procedures • GBLLC-DOC-015 Secondary Supplier Audit Checklist • GBLLC-DOC-016 Tract Inspection Form • GBLLC-DOC018 FSC Controlled Wood/PEFC Due Diligence Risk Assessment
Risk Rating	X **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
1.1.3	The feedstock input profile is described and categorised by the mix of inputs.
Finding	The feedstock input profile is described and categorised by the mix of inputs.
Means of Verification	Verify 2018-2019 wood purchases in LIMS.
Evidence Reviewed	2018-2019 wood purchases
Risk Rating	X **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
1.2.1	The Biomass Producer has implemented appropriate control systems and procedures to ensure that legality of ownership and land use can be demonstrated for the Supply Base.
Finding	There are appropriate control systems and procedures to ensure that legality of ownership and land use can be demonstrated for the Supply Base. Illegal harvesting in the supply base is prohibited by state laws. In most states the timber buyers and/or harvesting companies have to be licensed in order to conduct their business. Evidence indicates that major violations are prosecuted and legal liability is enforced. There is no evidence suggesting that illegal logging is a wide scale problem in the United States (US). Commonly used terms for violations in US are timber theft, tree poaching and unlawful logging. Thefts do occur, however the share of illegal felling in hardwoods is much smaller than 1% according to a study conducted by American Hardwood Export Council. It is logical to conclude that similarly illegal logging is not a major problem for softwoods in US. Further, legality of ownership and land use is enforced through Company procedures and contractual agreements by suppliers.
Means of Verification	State laws, Company policy, regional risk assessment, contract provisions with suppliers.

Evidence Reviewed	• GBLLC-POL-001 Sustainable Forestry Policy • GBLLC-PROC-001 Chain of Custody Procedures • GBLLC-DOC-018 FSC Controlled Wood/PEFC Due Diligence Risk Assessment • Delivered Fiber and Logging & Hauling Agreements • State laws addressing illegal logging and wood theft are as follows: *Alabama Laws* ALA. CODE 1975 § 9-13-62 awards double damages for a trespass that is committed *knowingly and intentionally*." Article 3 - Regulations as to Cutting, Removal, Purchase, etc., of Forest Products § 9-13-60 Unauthorized cutting, removal, transportation, etc., of timber or other forest products § 9-13-61 Charges in affidavits, information or indictments under article; proof of title, etc. § 9-13-62 Liability § 9-13-63 Record of purchases, etc., of manufactured or semi-manufactured forest products; provision of false information to purchasers, etc.; failure to maintain record, etc. § 9-13-64 Powers of State Forestry Commission employees as to enforcement of article, etc. § 9-13-65 Disposition of fines Article 9 - Timber Theft Equipment Condemnation § 9-13-220 Short title § 9-13-221 Seizure of vehicle and equipment upon arrest for certain criminal violations; delivery to district forester § 9-13-222 Report of seizure to district attorney § 9-13-223 Report to district attorney after conviction of person for theft of timber or lumber § 9-13-224 Notice to creditors; institution of condemnation proceedings; legal title to equipment § 9-13-225 Forfeiture of equipment upon judgment; costs of proceedings; § 9-13-226 Use of proceeds from sale of equipment; award and distribution determined by State Forester Logging Notice Act - Act 12-0257 *Georgia Laws* House Bill - HB 790 Provides additional enforcement authority to Georgia Forestry Commission investigators In cases involving the unauthorized cutting or cutting and carrying away of timber from the property of another damages shall be awarded in accordance with GA. CODE ANN. § 51-12-50. Amends GA. CODE ANN. § 51-12-50 whereas damages shall be: (1) Treble the fair market value of the trees cut as they stood; (2) Treble the diminished fair market value of any trees incidentally harmed; (3) Costs of reasonable reforestation activities related to the plaintiff's injury; and (4) Attorney fees and expenses of litigation. When defendant is a willful trespasser, plaintiff may receive punitive damages. Amends GA. CODE ANN. § 12-6-23 relating to wood load ticket required for wood removal, so as to require purchasers to provide the proper tickets to sellers of timber within 20 days GA Codes Title 12 Forest Resources and other Plant Life Article 1 – Forestry Resources

	GA. CODE § 12-6-23 - Wood load ticket required for wood removal; form; exceptions GA. CODE § 12-6-24 - Notice of timber harvesting operations *Florida Laws* Title XXXIII Regulation of Trade, Commerce, Investments, and Solicitations Chapter 536 Timber and Lumber § 536.13 Stamp or brand for logs. Any person engaged in this state in the business of getting out, buying, selling, or manufacturing saw logs, may adopt a stamp or brand for... § 536.14 Brands to be recorded by clerk of circuit court. A person may execute a written declaration that she or he has adopted a brand, describing it, and after acknowledgment of such declaration before any... § 536.15 May prevent use by others. Any person who has had her or his brand recorded in any county, may prevent other persons from using the same in said county by... § 536.16 Prima facie evidence of ownership. Any log found in any county branded with a brand recorded in said county by any person shall be deemed prima facie to be the... § 536.17 Where two or more brands the same. In case there shall be recorded in the same county two or more brands the same, or substantially the same, the brand first recorded shall... § 536.18 Defacing the mark or brand of lumber and timber. If any person shall fraudulently alter, change or deface the duly recorded mark, brand, or stamp of any lumber, logs or timber, or shall fraudulently... § 536.19 Unlawful use of recorded log brand or stamp. Any person who shall unlawfully use any recorded log brand or stamp of another shall be guilty of a misdemeanor of the second degree, punishable... *South Carolina Laws* S.C. CODE ANN. 1976 § 16-11-580 “if the value of stolen forest products is $5,000 or more, a defendant is fined at the discretion of the court or imprisoned for not more than ten years.” This code also allows for seizure and forfeiture of all property used in the timber theft. S.C. CODE ANN. 1976 § 16-13-177 “imposes the forfeiture of property used in a timber trespass if more than $5,000 of timber is taken.”
Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
1.3.1	The BP has implemented appropriate control systems and procedures to ensure that feedstock is legally harvested and supplied and is in compliance with EUTR legality requirements.
Finding	There are appropriate control systems and procedures to ensure that legality of ownership and land use can be demonstrated for the Supply Base. Illegal harvesting in the supply base is prohibited by state laws. In most states the timber buyers and/or harvesting companies have to be licensed in order to conduct their business. Evidence indicates that major violations are prosecuted and legal liability is enforced. There is no evidence suggesting that illegal logging is a wide scale problem in the United States (US). Commonly used terms for violations in US are timber theft, tree poaching and unlawful logging. Thefts do occur, however the share of illegal felling in hardwoods is much smaller than 1% according to a study conducted by American Hardwood Export Council. It is logical to conclude that similarly illegal logging is not a major problem for softwoods in US. Further, legality of ownership and land use is enforced through Company procedures and contractual agreements by suppliers.
Means of Verification	State laws, Company policy, regional risk assessment, contract provisions with suppliers.
Evidence Reviewed	• GBLLC-POL-001 Sustainable Forestry Policy • GBLLC-PROC-001 Chain of Custody Procedures • GBLLC-DOC-018 FSC Controlled Wood/PEFC Due Diligence Risk Assessment • Delivered Fiber and Logging & Hauling Agreements • State laws addressing illegal logging and wood theft
Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
1.4.1	The Biomass Producer has implemented appropriate control systems and procedures to verify that payments for harvest rights and timber, including duties, relevant royalties and taxes related to timber harvesting, are complete and up to date.
Finding	Company has implemented appropriate control systems and procedures to verify that payments for harvest rights and timber, including duties, relevant royalties and taxes related to timber harvesting, are complete and up to date. Delivered Fiber and Logging & Hauling Agreements stipulate that all severance taxes are to be withheld and payable directly to the appropriate governmental authority for primary feedstock.
Means of Verification	Delivered Fiber and Logging & Hauling Agreements with suppliers, severance tax payment records
Evidence Reviewed	• GBLLC-POL-001 Sustainable Forestry Policy • Delivered Fiber and Logging & Hauling Agreements • Severance tax payment records evidence payment of taxes
Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**

Comment or Mitigation Measure	

	Indicator
1.5.1	The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is supplied in compliance with the requirements of CITES.
Finding	Company has implemented appropriate control systems and procedures to verify that feedstock is supplied in compliance with the requirements of CITES. Based on review of the CITES list it is determined that there are no species used in Company operations that are included in the CITES list.
Means of Verification	GBLLC-DOC-018 FSC Controlled Wood/PEFC Due Diligence Risk Assessment
Evidence Reviewed	• GBLLC-DOC-002 FSC Product Group Schedule • GBLLC-DOC-018 FSC Controlled Wood/PEFC Due Diligence Risk Assessment
Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
1.6.1	The Biomass Producer has implemented appropriate control systems and procedures to ensure that feedstock is not sourced from areas where there are violations of traditional or civil rights.
Finding	GBLLC-POL-001 Sustainable Forestry Policy states the Company will abide by all laws and regulations, including those laws associated with traditional and civil rights. 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. The Company has implemented the FSC US Controlled Wood National Risk Assessment (US NRA) which has determined Controlled Wood Category 2: Wood harvested in violation of traditional and human rights to be “low risk”.
Means of Verification	GBLLC-POL-001 Sustainable Forestry Policy , FSC US Controlled Wood National Risk Assessment (US NRA)
Evidence Reviewed	• GBLLC-POL-001 Sustainable Forestry Policy • GBLLC-DOC-018 FSC Controlled Wood/PEFC Due Diligence Risk Assessment • FSC US Controlled Wood National Risk Assessment (US NRA)

Risk Rating	X **Low Risk**	☐ **Specified Risk**	☐ **Unspecified Risk at RA**
Comment or Mitigation Measure			

	Indicator
2.1.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that forests and other areas with high conservation values are identified and mapped.
Finding	GBLLC-DOC-018 FSC Controlled Wood/PEFC Due Diligence Risk Assessment identified and mapped the presence or absence of the following high conservation value areas within its supply base. The FSC US Controlled Wood National Risk Assessment (US NRA) was the basis for the identification and mapping of areas with high conservation value (HCV). The US NRA consulted with and applied recommendations from over 200 conservation groups and databases including, but not limited to, Protected Areas Database of the United States (PAD-US), International Union for the Conservation of Nature (IUCN), The Nature Conservancy, NatureServe, & USFS Inventoried Roadless Areas to map these HCVs. In addition to the US NRA, the company used World Wildlife Fund (WWF) eco-regions, Critical Ecosystem Partnership Fund biodiversity hotspots, IUCN Centres for Plant Diversity, Alliance for Zero Extinction and GreenPeace Intact Forests to identify and map HCV areas. The Company determined its feedstock supply area based on the primary, secondary & tertiary feedstock the facility is receiving. The company has expanded its identification and mapping of high conservation value areas (HCVs) by mapping HCV by supplier. These supplier HCV maps collectively define the overall supply area for the company. These more detailed supplier maps utilize the conservation measures from the FSC Controlled Wood US National Risk Assessment (US NRA) where HCVs of "specified risk" have been identified. These supplier maps are used in conjunction with GBLLC-DOC-015 Secondary Supplier Audit Checklist to annually review each supplier's supply area, areas of "specified risk" that are identified in their supply areas and mitigation measures being implemented to reduce "specified risk" to "low risk". GBLLC-DOC-018 FSC Controlled Wood/PEFC Due Diligence Risk Assessment identifies and maps HCVs with "specified risk" designations.
Means of Verification	Maps included in GBLLC-DOC-018 FSC Controlled Wood/PEFC Due Diligence Risk Assessment and GBLLC-DOC-015 Secondary Supplier Audit Checklist
Evidence Reviewed	• GBLLC-DOC-018 FSC Controlled Wood/PEFC Due Diligence Risk Assessment • GBLLC-DOC-015 Secondary Supplier Audit Checklist • FSC US Controlled Wood National Risk Assessment (US NRA)
Risk Rating	X **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

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

Finding	GBLLC-DOC-018 FSC Controlled Wood/PEFC Due Diligence Risk Assessment using the FSC US Controlled Wood National Risk Assessment (US NRA) and other reputable conservation initiatives identified and mapped the presence or absence of the following high conservation value areas (HCVs) within the company's supply base.
	The FSC US National Risk Assessment (US NRA) has identified the following HCVs that are located near, but not within GBLLC's supply area.
	• HCV1: Species Diversity
	  ○ Central Appalachians Critical Biodiversity Area (CBA)
	  ○ Cheoah Bald Salamander
	  ○ Patch-nosed Salamander
	  ○ Southern Appalachian CBA
	• HCV3: Rare Ecosystems
	  ○ Mesophytic Cove Sites
	There are no World Resources Institute (Global Forest Watch) Frontier Forests or USFS Inventoried Roadless Areas sites within the supply area.
	The following HCVs have been identified and mapped within the company's supply area and are assessed below. HCVs identified and assessed as "specified risk" will include describe measures to mitigate risks to a "low risk" level.
	The FSC US National Risk Assessment (US NRA) has identified the following HCVs that are located within GBLLC's supply area.
	• HCV1: Species Diversity
	  ○ Central Florida CBA
	  ○ Florida Panhandle CBA
	• HCV3: Rare Ecosystems
	  ○ Late Successional Bottomland Hardwoods
	  ○ Native Longleaf Pine Systems
	Within the GBLLC district of origin there are other HCVs associated from the high conservation value assessment frameworks identified below that occur within the GBLLC supply area.
	• IUCN Centre for Plant Diversity (CPD) - There is four CPD sites that may occur within the GBLLC district of origin.
	  1. <u>NA24 - Piedmont granitic rock outcrops</u>
	  A handful of rare species are known to occupy high quality granite outcrops and their occurrences indicate the locations of granite outcrops. They are black-spored quillwort (*Isoetes melanospora*), mat-forming quillwort (*Isoetes tegetiformans*), and harperella (*Ptilimnium nodosum*).
	  2. <u>NA25 – Eastern Serpentine flora</u>
	  Serpentine flora is restricted to soils derived from serpentine rock outcrops found in association with utramafic rock. Plants found in this CPD are specialists. They are adapted to the harsh conditions created by these soils and cannot survive outside of this habitat, making them obligate endemics to serpentine soils.
	  3. <u>NA28 – The Apalachicola River drainage</u>

The Apalachicola River drainage of north-western Florida is one of the classic areas of both endemics and rare plants, such as *Torreya taxifolia* and the associated herb *Croomia pauciflora*, this occurrence is the only record of any member of the family (Croomiaceae) found outside of Asia. The flora contains many endemics and tertiary relicts. The endemics occur primarily in the cool wet flatlands (savannas, seepage slopes and flatwoods).

This river basin is one of the most biologically diverse regions on earth. This diversity includes ecologically significant natural areas. The basin supports habitats that vary from rare steep-head ravines (with the only remaining native *Torreya taxifolia*), to towering limestone bluffs, forested floodplains, and estuaries. The region is home to numerous rare plants including species found nowhere else.

4. NA29 - The Central Highlands of Florida

   The Central Highlands of Florida is an elevated region of Florida that was dry during the most recent interglacial period of the Ice Age. This CPD contains 41 species of endemic vascular plant species found in scrub habitat with an overstory of sand pine. The ecological value of the area is its high level of plant endemism.

- Alliance for Zero Extinction (AZE) - The Torreya State Park, is located within the wood basin in Liberty County, Florida. The park protects the bulk of extant occurrences within the natural range of the Florida Torreya, *Torreya taxifolia*.
- Critical Ecosystem Partnership Fund – North American Coastal Plain was added to the Biodiversity Hotspot list in 2016. The North American Coastal Plain reaches from a small section of northern Mexico along the Gulf of Mexico and up the East Coast to southeastern Massachusetts. Despite the 1,816 endemic plant species and the 1.13 million square kilometers of area, the hotspot has a low level of geographic variety and an unusually low level of elevation change when compared to the other hotspots, leading the scientific community to assume it would be less biodiverse.
- GreenPeace Intact Forest - A Greenpeace Intact Forest is located in Charlton and Ware Counties, GA which is within the GBLLC district of origin. It is almost entirely within the 403,119-acre Okefenokee National Wildlife Refuge which has been described as “one of North America’s most unspoiled, fascinating and precious natural areas”. The Okefenokee Swamp is the largest, intact, un-fragmented, freshwater and black water wilderness swamp in North America. There are 353,000 acres designated as a National Wilderness Area within the refuge.
- World Wildlife Fund (WWF), Global 200 Ecoregion - Southeastern Coniferous & Broadleaf Forests (# 75 in the WWF Global 200)

  The WWF's Global 200 Ecoregions build a framework for describing the most important areas of biodiversity on the planet. The Global 200 encompass almost 50% of life on earth. These 200 areas are places that conservation groups target and discuss with forest products companies about the loss of global, forest biodiversity.

  It is significant at a global scale, but this global ecoregion (#75) is subdivided into two smaller endangered/critical terrestrial ecoregions (Figure 11). These scaled-down subdivisions have significance at the national level.

  - The Southeastern mixed forests (NA0413)
  - The Southeastern conifer forests (NA0529)

    1. The Southeastern mixed forests (NA0413) is a highly degraded ecoregion with more than 99% of the original habitat having been converted to other uses. Settlers within the ecoregion logged and then cleared the land for agriculture. The ecoregion overlaps and is synonymous with the Piedmont physiographic province along the Atlantic Slope and the rest falls into the Coastal Plain on the Gulf Coast. WWF reports that there is little habitat left to conserve in this critical/endangered ecoregion.
    2. The Southeastern conifer forests (NA0529) is the second terrestrial ecoregion that makes up the global ecoregion # 75. The ecoregion extends from the

	Savannah River in Georgia across the coastal plain to the eastern parishes of Louisiana and south into Florida in the vicinity of Lake Okeechobee. This ecoregion is equated with the longleaf pine ecosystem that once spanned a significant portion of the coastal plain. It was dominated by a longleaf pine overstory and an exceptionally diverse array of plants in the understory and especially in the herbaceous layer. The entire ecology of this region was driven by fire which maintained a longleaf pine dominance in the overstory. Many species of birds, reptiles, and amphibians adapted to this environment as well. The red-cockaded woodpecker, gopher tortoise, indigo snake, and flatwoods salamander are some of the more threatened, regulated, and managed of those taxa. • Protected Areas as identified by Protected Areas Database of the United States (PAD-US) represents about 9.2% of the GBLLC supply area. PAD-US is the official inventory of public parks and other protected open space. The spatial data in PAD-US represents public lands held in trust by thousands of national, state and regional/local governments, as well as non-profit conservation organizations.
Means of Verification	Delivered Fiber and Logging & Hauling Agreements, GBLLC-DOC-015 Secondary Supplier Audit Checklist
Evidence Reviewed	• Delivered Fiber and Logging & Hauling Agreements • GBLLC-DOC-018 FSC Controlled Wood/PEFC Due Diligence Risk Assessment • GBLLC-DOC-015 Secondary Supplier Audit Checklist • FSC US Controlled Wood National Risk Assessment (US NRA)
Risk Rating	☐ **Low Risk** X **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	<u>Central FL CBA</u> 3. 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. 4. 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. <u>Florida Panhandle CBA</u> 3. 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. 4. 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. <u>Late Successional Bottomland Hardwoods</u> 4. 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. 5. 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. 6. 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. <u>Natural Longleaf Pine Systems</u> 4. 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. 5. 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. 6. 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. <u>IUCN Centres for Plant Diversity (CPD)</u>

5. NA24 - Piedmont granitic rock outcrops
   5.1. It is unlikely that commercial timber harvesting will occur on these granite rock outcrop sites.
   5.2. 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.
6. NA25 – Eastern Serpentine flora
   6.1. It is unlikely that commercial timber harvesting will occur on these serpentine soils.
   6.2. 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.
7. NA28 – The Apalachicola River drainage
   7.1. 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.
   7.2. 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.
   7.3. This CPD site is within the FL Panhandle CBA. The mitigation measures described for the FL Panhandle will also be used for this site.
8. NA29 - The Central Highlands of Florida
   8.1. 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.
   8.2. 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

4. 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.
5. 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.
6. 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

3. 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.

	4. 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 3. Southeastern mixed forests (NA0413) 3.1. 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. 4. Southeastern conifer forests (NA0529) 4.1. This ecoregion is within the Native Longleaf Pine Systems (NLPS) area. The mitigation measures described for NLPS will also be used for this site.

	Indicator
2.1.3	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not sourced from forests converted to production plantation forest or non-forest lands after January 2008.
Finding	FSC US Controlled Wood National Risk Assessment (US NRA) Category 4: Forestland Conversion The US NRA has identified the forested portions of 53 counties across the FSC US Southeast and Pacific Coast Regions as areas where there is a risk greater than "low" receiving forest materials from forest conversions. Companies that wish to use non-certified materials from the identified areas are required to either avoid sourcing from specific sites where forest conversion is occurring, or to implement mitigation actions that reduce the risk of sourcing from these sites. There are ten (10) counties identified in the three (3) states (FL, GA, SC) that are located within the GBLLC supply area according to GBLLC-DOC-018 FSC Controlled Wood/PEFC Due Diligence Risk Assessment. Company fiber purchase agreement prohibits suppliers from supplying products from knowingly supplying fiber that is sourced from lands that were converted to production plantation forest or none forest lands after January 2008 or will be converted to plantation forest or none forest lands in the present or future. Production plantation forests are defined as forests of exotic species that have been planted or seeded by human intervention and that are under intensive stand management, are fast growing, and subject to short rotations (e.g. poplar, acacia or eucalyptus plantations). Company monitors compliance through GBLLC-DOC-016 Tract Inspection Form for primary feedstock and GBLLC-DOC-015 Secondary Supplier Audit Checklist for secondary & tertiary feedstock.
Means of Verification	Delivered Fiber and Logging & Hauling Agreements, GBLLC-DOC-016 Tract Inspection Form, GBLLC-DOC-015 Secondary Supplier Audit Checklist
Evidence Reviewed	• Delivered Fiber and Logging & Hauling Agreements • GBLLC-DOC-018 FSC Controlled Wood/PEFC Due Diligence Risk Assessment • GBLLC-DOC-015 Secondary Supplier Audit Checklist • GBLLC-DOC-016 Tract Inspection Form
Risk Rating	☐ **Low Risk** X **Specified Risk** ☐ **Unspecified Risk at RA**

Comment or Mitigation Measure	Forestland Conversion 5. GBLLC is implemented verbiage on their fiber purchase agreements that prohibits suppliers from supplying products from knowingly supplying fiber that is sourced from lands that were converted to production plantation forest or none forest lands after January 2008 or will be converted to plantation forest or none forest lands in the present or future. 6. 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. 7. 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. 8. 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.

	Indicator
2.2.1	The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them.
Finding	Company has conducted a risk assessment on the supply basin. All fiber sourced can be traced to locations encompassed by the supply basin. Company requires its primary feedstock suppliers to harvest fiber in compliance with state BMPs and to maintain SFI State Implementation Committee (SIC) logger training requirements to control the impact on the forests. Company conducts compliance checks to verify supplier compliance with BMPs for primary feedstock. Almost half of the Company's secondary & tertiary feedstock suppliers (18 of 44) are certified to the Sustainable Forestry Initiative (SFI) Fiber Sourcing Standard. These suppliers are 3rd party certified with verified BMP compliance monitoring programs. All suppliers require their suppliers and loggers to maintain SIC logger training. This training educates loggers on BMPs, threatened & endangered species and biodiversity. The Company has access to state SIC logger training databases to verify logger training. In addition state forestry agencies conduct BMP compliance checks randomly or upon request by stakeholders. State BMP compliance reports are available for review by Company.
Means of Verification	Delivered Fiber and Logging & Hauling Agreements, GBLLC-DOC-016 Tract Inspection Form, GBLLC-DOC-015 Secondary Supplier Audit Checklist, State SIC Logger Training databases, State forestry BMP compliance reports

Evidence Reviewed	• Delivered Fiber and Logging & Hauling Agreements • GBLLC-DOC-018 FSC Controlled Wood/PEFC Due Diligence Risk Assessment • GBLLC-DOC-015 Secondary Supplier Audit Checklist • GBLLC-DOC-016 Tract Inspection Form • SFI Certification Database http://www.sfidatabase.org/PublicSearch/MainSearch.aspx • Alabama Professional Logging Manager https://www.alaforestry.org/page/PLMGeneral • Florida Master Logger • http://floridaforest.org/programs/master-logger/master-logger-search-tool/ • Georgia Master Timber Harvester http://gamth.org/ • South Carolina Timber Operations Professional (TOP) Program https://www.scforestry.org/top-forestry-programs.htm • Alabama Annual BMP Reports http://www.forestry.alabama.gov/Pages/Management/BMP_Practices.aspx • Florida Silviculture Best Management Practices 2017 Implementation Survey Report • https://www.freshfromflorida.com/content/download/78966/2320474/SPMP_2017_ImplementationSurveyReport.pdf • Results of Georgia's 2017 Silvicultural Best Management Practices Implementation and Compliance Survey http://www.gfc.state.ga.us/forest-management/water-quality/bmps/BMP%20Survey%202017%20Results%20Report%20Final%20Corrected%20by%20Scott%20Jan112018%20410pm.pdf • Forestry BMPs in South Carolina: Compliance and Implementation Monitoring Report, 2015-2016 https://www.state.sc.us/forest/bmp16.pdf
Risk Rating	X **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
2.2.2	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b).
Finding	State forestry Best Management Practices (BMP) set forth guidelines for maintaining and/or improving soil quality. GBLLC-POL-001 Sustainable Forestry Policy states the Company requires BMP compliance with the harvesting of all wood fiber it receives. Delivered Fiber and Logging & Hauling Agreements require BMP compliance. The Company verifies BMP compliance for primary feedstock using GBLLC-DOC-016 Tract Inspection Form and for secondary & tertiary feedstock using GBLLC-DOC-015 Secondary Supplier Audit Checklists as part of its annual supplier audits. The company requires their suppliers, sub-suppliers and loggers to maintain SFI State Implementation Committee (SIC) logger training. This training educates loggers on BMPs, threatened & endangered species and biodiversity. The Company has access to SIC logger training databases to verify logger training. Almost half of the Company's secondary & tertiary feedstock suppliers (18 of 44) are certified to the Sustainable Forestry Initiative (SFI) Fiber Sourcing Standard. These suppliers are 3rd party certified with verified BMP compliance monitoring programs. All suppliers require their suppliers and loggers to maintain SIC logger training. This training educates loggers on BMPs, threatened & endangered species and biodiversity. The Company has access to state SIC logger training databases to verify logger training. State forestry agencies conduct BMP compliance checks randomly or upon request by stakeholders. State BMP compliance reports are available for review by the Company. Soil maps covering the supply basin are available as a resource to suppliers to assist in planning fiber harvest in a way that does not harm soil quality.
Means of Verification	Delivered Fiber and Logging & Hauling Agreements, GBLLC-DOC-016 Tract Inspection Form, GBLLC-DOC-015 Secondary Supplier Audit Checklist, State SIC Logger Training databases, State forestry BMP compliance reports
Evidence Reviewed	• Delivered Fiber and Logging & Hauling Agreements • GBLLC-DOC-018 FSC Controlled Wood/PEFC Due Diligence Risk Assessment • GBLLC-DOC-015 Secondary Supplier Audit Checklist • GBLLC-DOC-016 Tract Inspection Form • SFI Certification Database http://www.sfidatabase.org/PublicSearch/MainSearch.aspx • Alabama Professional Logging Manager https://www.alaforestry.org/page/PLMGeneral • Florida Master Logger • http://floridaforest.org/programs/master-logger/master-logger-search-tool/ • Georgia Master Timber Harvester http://gamth.org/ • South Carolina Timber Operations Professional (TOP) Program https://www.scforestry.org/top-forestry-programs.htm • Alabama Annual BMP Reports http://www.forestry.alabama.gov/Pages/Management/BMP_Practices.aspx • Florida Silviculture Best Management Practices 2017 Implementation Survey Report • https://www.freshfromflorida.com/content/download/78966/2320474/SPMP_2017_ImplementationSurveyReport.pdf • Results of Georgia's 2017 Silvicultural Best Management Practices Implementation and Compliance Survey http://www.gfc.state.ga.us/forest-management/water-quality/bmps/BMP%20Survey%202017%20Results%20Report%20Final%20Corrected%20by%20Scott%20Jan112018%20410pm.pdf

	• Forestry BMPs in South Carolina: Compliance and Implementation Monitoring Report, 2015-2016 https://www.state.sc.us/forest/bmp16.pdf • USGS Soils Map Database https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx
Risk Rating	X **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

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

Finding	GBLLC-DOC-018 FSC Controlled Wood/PEFC Due Diligence Risk Assessment using the FSC US Controlled Wood National Risk Assessment (US NRA) and other reputable conservation initiatives identified and mapped the presence or absence of the following high conservation value areas (HCVs) within the company's supply base.
	The FSC US National Risk Assessment (US NRA) has identified the following HCVs that are located near, but not within GBLLC's supply area.
	• HCV1: Species Diversity
	  ○ Central Appalachians Critical Biodiversity Area (CBA)
	  ○ Cheoah Bald Salamander
	  ○ Patch-nosed Salamander
	  ○ Southern Appalachian CBA
	• HCV3: Rare Ecosystems
	  ○ Mesophytic Cove Sites
	There are no World Resources Institute (Global Forest Watch) Frontier Forests or USFS Inventoried Roadless Areas sites within the supply area.
	The following HCVs have been identified and mapped within the company's supply area and are assessed below. HCVs identified and assessed as "specified risk" will include describe measures to mitigate risks to a "low risk" level.
	The FSC US National Risk Assessment (US NRA) has identified the following HCVs that are located within GBLLC's supply area.
	• HCV1: Species Diversity
	  ○ Central Florida CBA
	  ○ Florida Panhandle CBA
	• HCV3: Rare Ecosystems
	  ○ Late Successional Bottomland Hardwoods
	  ○ Native Longleaf Pine Systems
	Within the GBLLC district of origin there are other HCVs associated from the high conservation value assessment frameworks identified below that occur within the GBLLC supply area.

- IUCN Centre for Plant Diversity (CPD) - There is four CPD sites that may occur within the GBLLC district of origin.
  1. NA24 - Piedmont granitic rock outcrops

     A handful of rare species are known to occupy high quality granite outcrops and their occurrences indicate the locations of granite outcrops. They are black-spored quillwort (*Isoetes melanospora*), mat-forming quillwort (*Isoetes tegetiformans*), and harperella (*Ptilimnium nodosum*).
  2. NA25 – Eastern Serpentine flora

     Serpentine flora is restricted to soils derived from serpentine rock outcrops found in association with utramafic rock. Plants found in this CPD are specialists. They are adapted to the harsh conditions created by these soils and cannot survive outside of this habitat, making them obligate endemics to serpentine soils.
  3. NA28 – The Apalachicola River drainage

     The Apalachicola River drainage of north-western Florida is one of the classic areas of both endemics and rare plants, such as *Torreya taxifolia* and the associated herb *Croomia pauciflora*, this occurrence is the only record of any member of the family (Croomiaceae) found outside of Asia. The flora contains many endemics and tertiary relicts. The endemics occur primarily in the cool wet flatlands (savannas, seepage slopes and flatwoods).

     This river basin is one of the most biologically diverse regions on earth. This diversity includes ecologically significant natural areas. The basin supports habitats that vary from rare steep-head ravines (with the only remaining native *Torreya taxifolia*), to towering limestone bluffs, forested floodplains, and estuaries. The region is home to numerous rare plants including species found nowhere else.
  4. NA29 - The Central Highlands of Florida

     The Central Highlands of Florida is an elevated region of Florida that was dry during the most recent interglacial period of the Ice Age. This CPD contains 41 species of endemic vascular plant species found in scrub habitat with an overstory of sand pine. The ecological value of the area is its high level of plant endemism.
- Alliance for Zero Extinction (AZE) - The Torreya State Park, is located within the wood basin in Liberty County, Florida. The park protects the bulk of extant occurrences within the natural range of the Florida Torreya, *Torreya taxifolia*.
- Critical Ecosystem Partnership Fund – North American Coastal Plain was added to the Biodiversity Hotspot list in 2016. The North American Coastal Plain reaches from a small section of northern Mexico along the Gulf of Mexico and up the East Coast to southeastern Massachusetts. Despite the 1,816 endemic plant species and the 1.13 million square kilometers of area, the hotspot has a low level of geographic variety and an unusually low level of elevation change when compared to the other hotspots, leading the scientific community to assume it would be less biodiverse.
- GreenPeace Intact Forest - A Greenpeace Intact Forest is located in Charlton and Ware Counties, GA which is within the GBLLC district of origin. It is almost entirely within the 403,119-acre Okefenokee National Wildlife Refuge which has been described as “one of North America’s most unspoiled, fascinating and precious natural areas”. The Okefenokee Swamp is the largest, intact, un-fragmented, freshwater and black water wilderness swamp in North America. There are 353,000 acres designated as a National Wilderness Area within the refuge.
- World Wildlife Fund (WWF), Global 200 Ecoregion - Southeastern Coniferous & Broadleaf Forests (# 75 in the WWF Global 200)

  The WWF's Global 200 Ecoregions build a framework for describing the most important areas of biodiversity on the planet. The Global 200 encompass almost 50% of life on earth. These 200 areas are places that conservation groups target and discuss with forest products companies about the loss of global, forest biodiversity.

	It is significant at a global scale, but this global ecoregion (#75) is subdivided into two smaller endangered/critical terrestrial ecoregions (Figure 11). These scaled-down subdivisions have significance at the national level. ○ The Southeastern mixed forests (NA0413) ○ The Southeastern conifer forests (NA0529) 1. The Southeastern mixed forests (NA0413) is a highly degraded ecoregion with more than 99% of the original habitat having been converted to other uses. Settlers within the ecoregion logged and then cleared the land for agriculture. The ecoregion overlaps and is synonymous with the Piedmont physiographic province along the Atlantic Slope and the rest falls into the Coastal Plain on the Gulf Coast. WWF reports that there is little habitat left to conserve in this critical/endangered ecoregion. 2. The Southeastern conifer forests (NA0529) is the second terrestrial ecoregion that makes up the global ecoregion # 75. The ecoregion extends from the Savannah River in Georgia across the coastal plain to the eastern parishes of Louisiana and south into Florida in the vicinity of Lake Okeechobee. This ecoregion is equated with the longleaf pine ecosystem that once spanned a significant portion of the coastal plain. It was dominated by a longleaf pine overstory and an exceptionally diverse array of plants in the understory and especially in the herbaceous layer. The entire ecology of this region was driven by fire which maintained a longleaf pine dominance in the overstory. Many species of birds, reptiles, and amphibians adapted to this environment as well. The red-cockaded woodpecker, gopher tortoise, indigo snake, and flatwoods salamander are some of the more threatened, regulated, and managed of those taxa. • Protected Areas as identified by Protected Areas Database of the United States (PAD-US) represents about 9.2% of the GBLLC supply area. PAD-US is the official inventory of public parks and other protected open space. The spatial data in PAD-US represents public lands held in trust by thousands of national, state and regional/local governments, as well as non-profit conservation organizations.
Means of Verification	Delivered Fiber and Logging & Hauling Agreements, GBLLC-DOC-015 Secondary Supplier Audit Checklist
Evidence Reviewed	• Delivered Fiber and Logging & Hauling Agreements • GBLLC-DOC-018 FSC Controlled Wood/PEFC Due Diligence Risk Assessment • GBLLC-DOC-015 Secondary Supplier Audit Checklist • FSC US Controlled Wood National Risk Assessment (US NRA)
Risk Rating	☐ **Low Risk** X **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	<u>Central FL CBA</u> 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. <u>IUCN Centres for Plant Diversity (CPD)</u> 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.

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

Finding	GBLLC-DOC-018 FSC Controlled Wood/PEFC Due Diligence Risk Assessment using the FSC US Controlled Wood National Risk Assessment (US NRA) and other reputable conservation initiatives identified and mapped the presence or absence of the following high conservation value areas (HCVs) within the company's supply base.
	The FSC US National Risk Assessment (US NRA) has identified the following HCVs that are located near, but not within GBLLC's supply area.
	• HCV1: Species Diversity
	  ○ Central Appalachians Critical Biodiversity Area (CBA)
	  ○ Cheoah Bald Salamander
	  ○ Patch-nosed Salamander
	  ○ Southern Appalachian CBA
	• HCV3: Rare Ecosystems
	  ○ Mesophytic Cove Sites
	There are no World Resources Institute (Global Forest Watch) Frontier Forests or USFS Inventoried Roadless Areas sites within the supply area.
	The following HCVs have been identified and mapped within the company's supply area and are assessed below. HCVs identified and assessed as "specified risk" will include describe measures to mitigate risks to a "low risk" level.
	The FSC US National Risk Assessment (US NRA) has identified the following HCVs that are located within GBLLC's supply area.
	• HCV1: Species Diversity
	  ○ Central Florida CBA
	  ○ Florida Panhandle CBA
	• HCV3: Rare Ecosystems
	  ○ Late Successional Bottomland Hardwoods
	  ○ Native Longleaf Pine Systems
	Within the GBLLC district of origin there are other HCVs associated from the high conservation value assessment frameworks identified below that occur within the GBLLC supply area.
	• IUCN Centre for Plant Diversity (CPD) - There is four CPD sites that may occur within the GBLLC district of origin.
	  1. <u>NA24 - Piedmont granitic rock outcrops</u>
	  A handful of rare species are known to occupy high quality granite outcrops and their occurrences indicate the locations of granite outcrops. They are black-spored quillwort (*Isoetes melanospora*), mat-forming quillwort (*Isoetes tegetiformans*), and harperella (*Ptilimnium nodosum*).
	  2. <u>NA25 – Eastern Serpentine flora</u>
	  Serpentine flora is restricted to soils derived from serpentine rock outcrops found in association with utramafic rock. Plants found in this CPD are specialists. They are adapted to the harsh conditions created by these soils and cannot survive outside of this habitat, making them obligate endemics to serpentine soils.
	  3. <u>NA28 – The Apalachicola River drainage</u>
	  The Apalachicola River drainage of north-western Florida is one of the classic areas of both endemics and rare plants, such as *Torreya taxifolia* and the

associated herb *Croomia pauciflora*, this occurrence is the only record of any member of the family (Croomiaceae) found outside of Asia. The flora contains many endemics and tertiary relicts. The endemics occur primarily in the cool wet flatlands (savannas, seepage slopes and flatwoods).

This river basin is one of the most biologically diverse regions on earth. This diversity includes ecologically significant natural areas. The basin supports habitats that vary from rare steep-head ravines (with the only remaining native *Torreya taxifolia*), to towering limestone bluffs, forested floodplains, and estuaries. The region is home to numerous rare plants including species found nowhere else.

4. NA29 - The Central Highlands of Florida

   The Central Highlands of Florida is an elevated region of Florida that was dry during the most recent interglacial period of the Ice Age. This CPD contains 41 species of endemic vascular plant species found in scrub habitat with an overstory of sand pine. The ecological value of the area is its high level of plant endemism.

- Alliance for Zero Extinction (AZE) - The Torreya State Park, is located within the wood basin in Liberty County, Florida. The park protects the bulk of extant occurrences within the natural range of the Florida Torreya, *Torreya taxifolia*.
- Critical Ecosystem Partnership Fund – North American Coastal Plain was added to the Biodiversity Hotspot list in 2016. The North American Coastal Plain reaches from a small section of northern Mexico along the Gulf of Mexico and up the East Coast to southeastern Massachusetts. Despite the 1,816 endemic plant species and the 1.13 million square kilometers of area, the hotspot has a low level of geographic variety and an unusually low level of elevation change when compared to the other hotspots, leading the scientific community to assume it would be less biodiverse.
- GreenPeace Intact Forest - A Greenpeace Intact Forest is located in Charlton and Ware Counties, GA which is within the GBLLC district of origin. It is almost entirely within the 403,119-acre Okefenokee National Wildlife Refuge which has been described as “one of North America’s most unspoiled, fascinating and precious natural areas”. The Okefenokee Swamp is the largest, intact, un-fragmented, freshwater and black water wilderness swamp in North America. There are 353,000 acres designated as a National Wilderness Area within the refuge.
- World Wildlife Fund (WWF), Global 200 Ecoregion - Southeastern Coniferous & Broadleaf Forests (# 75 in the WWF Global 200)

  The WWF's Global 200 Ecoregions build a framework for describing the most important areas of biodiversity on the planet. The Global 200 encompass almost 50% of life on earth. These 200 areas are places that conservation groups target and discuss with forest products companies about the loss of global, forest biodiversity.

  It is significant at a global scale, but this global ecoregion (#75) is subdivided into two smaller endangered/critical terrestrial ecoregions (Figure 11). These scaled-down subdivisions have significance at the national level.

  - The Southeastern mixed forests (NA0413)
  - The Southeastern conifer forests (NA0529)

    1. The Southeastern mixed forests (NA0413) is a highly degraded ecoregion with more than 99% of the original habitat having been converted to other uses. Settlers within the ecoregion logged and then cleared the land for agriculture. The ecoregion overlaps and is synonymous with the Piedmont physiographic province along the Atlantic Slope and the rest falls into the Coastal Plain on the Gulf Coast. WWF reports that there is little habitat left to conserve in this critical/endangered ecoregion.
    2. The Southeastern conifer forests (NA0529) is the second terrestrial ecoregion that makes up the global ecoregion # 75. The ecoregion extends from the Savannah River in Georgia across the coastal plain to the eastern parishes of Louisiana and south into Florida in the vicinity of Lake Okeechobee.

	This ecoregion is equated with the longleaf pine ecosystem that once spanned a significant portion of the coastal plain. It was dominated by a longleaf pine overstory and an exceptionally diverse array of plants in the understory and especially in the herbaceous layer. The entire ecology of this region was driven by fire which maintained a longleaf pine dominance in the overstory. Many species of birds, reptiles, and amphibians adapted to this environment as well. The red-cockaded woodpecker, gopher tortoise, indigo snake, and flatwoods salamander are some of the more threatened, regulated, and managed of those taxa. • Protected Areas as identified by Protected Areas Database of the United States (PAD-US) represents about 9.2% of the GBLLC supply area. PAD-US is the official inventory of public parks and other protected open space. The spatial data in PAD-US represents public lands held in trust by thousands of national, state and regional/local governments, as well as non-profit conservation organizations.
Means of Verification	Delivered Fiber and Logging & Hauling Agreements, GBLLC-DOC-015 Secondary Supplier Audit Checklist
Evidence Reviewed	• Delivered Fiber and Logging & Hauling Agreements • GBLLC-DOC-018 FSC Controlled Wood/PEFC Due Diligence Risk Assessment • GBLLC-DOC-015 Secondary Supplier Audit Checklist • FSC US Controlled Wood National Risk Assessment (US NRA)
Risk Rating	☐ **Low Risk** X **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	<u>Central FL CBA</u> 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. <u>Florida Panhandle CBA</u> 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.

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. <u>Alliance for Zero Extinction</u> 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 <u>will also be used for this site.</u> <u>GreenPeace Intact Forest</u> 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.

	Indicator
2.2.5	The Biomass Producer has implemented appropriate control systems and procedures for verifying that the process of residue removal minimises harm to ecosystems.
Finding	GBLLC has appropriate control systems and procedures to ensure residue removals are minimized in harming the ecosystem. State BMPs address wood and residue utilization. Delivered Fiber and Logging & Hauling Agreements have clauses requiring adherence to state BMPs. Procedures are in place to monitor BMP compliance on tracts delivering fiber directly from the forest. BMP Compliance Checklists are used to record wood utilization. The Company has distributed "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.
Means of Verification	State BMPs, Delivered Fiber and Logging & Hauling Agreements, BMP compliance checks
Evidence Reviewed	• Delivered Fiber and Logging & Hauling Agreements • GBLLC-PROC-002 SFI Fiber Sourcing Procedures • GBLLC-DOC-015 Secondary Supplier Audit Checklist • GBLLC-DOC-016 Tract Inspection Form • Alabama Professional Logging Manager https://www.alaforestry.org/page/PLMGeneral • Florida Master Logger http://floridaforest.org/programs/master-logger/master-logger-search-tool/ • Georgia Master Timber Harvester http://gamth.org/ • South Carolina Timber Operations Professional (TOP) Program https://www.scforestry.org/top-forestry-programs.htm • Alabama Annual BMP Reports http://www.forestry.alabama.gov/Pages/Management/BMP_Practices.aspx • Florida Silviculture Best Management Practices 2017 Implementation Survey Report https://www.freshfromflorida.com/content/download/78966/2320474/SPMP_2017_ImplementationSurveyReport.pdf • Results of Georgia's 2017 Silvicultural Best Management Practices Implementation and Compliance Survey http://www.gfc.state.ga.us/forest-management/water-quality/bmps/BMP%20Survey%202017%20Results%20Report%20Final%20Corrected%20by%20Scott%20Jan112018%20410pm.pdf • Alabama Professional Logging Manager https://www.alaforestry.org/page/PLMGeneral • Florida Master Logger

	http://floridaforest.org/programs/master-logger/master-logger-search-tool/ • Georgia Master Timber Harvester http://gamth.org/ • Forestry BMPs in South Carolina: Compliance and Implementation Monitoring Report, 2015-2016 https://www.state.sc.us/forest/bmp16.pdf • Forest Biomass Retention and Harvesting Guidelines for the Southeast https://foreststewardsguild.org/wp-content/uploads/2019/05/FG_Biomass_Guidelines_SE.pdf
Risk Rating	X **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
2.2.6	The Biomass Producer has implemented appropriate control systems and procedures to verify that negative impacts on ground water, surface water and water downstream from forest management are minimised (CPET S5b).
Finding	State and Federal laws, such as the Clean Water Act, are in place to protect the waters of the United States. Access to these laws is available to GBLLC personnel. State Forestry Commissions, working with state Environmental Protection Divisions are charged with the enforcement of these state and federal laws. In addition, state forestry BMPs have been developed to provide guidance in water quality protection. The state forestry agencies also conduct BMP compliance checks throughout the year and publicly report their findings. GBLLC policy and procedures are place to provide support and guidance on how Company employees and suppliers will meet BMPs in the harvest of fiber without having negative impacts to water quality. Delivered Fiber and Logging & Hauling Agreements have clauses requiring adherence to state BMPs. Procedures are in place to monitor BMP compliance on tracts delivering fiber directly from the forest.
Means of Verification	State and Federal laws, State BMPs, Delivered Fiber and Logging & Hauling Agreements provisions with suppliers, BMP compliance checks
Evidence Reviewed	• Delivered Fiber and Logging & Hauling Agreements • GBLLC-PROC-002 SFI Fiber Sourcing Procedures • GBLLC-DOC-015 Secondary Supplier Audit Checklist • GBLLC-DOC-016 Tract Inspection Form • Alabama Professional Logging Manager https://www.alaforestry.org/page/PLMGeneral • Florida Master Logger http://floridaforest.org/programs/master-logger/master-logger-search-tool/ • Georgia Master Timber Harvester http://gamth.org/ • South Carolina Timber Operations Professional (TOP) Program https://www.scforestry.org/top-forestry-programs.htm • Alabama Annual BMP Reports http://www.forestry.alabama.gov/Pages/Management/BMP_Practices.aspx • Florida Silviculture Best Management Practices 2017 Implementation Survey Report https://www.freshfromflorida.com/content/download/78966/2320474/SPMP_2017_ImplementationSurveyReport.pdf

	• Results of Georgia's 2017 Silvicultural Best Management Practices Implementation and Compliance Survey http://www.gfc.state.ga.us/forest-management/water-quality/bmps/BMP%20Survey%202017%20Results%20Report%20Final%20Corrected%20by%20Scott%20Jan112018%20410pm.pdf • Forestry BMPs in South Carolina: Compliance and Implementation Monitoring Report, 2015-2016 https://www.state.sc.us/forest/bmp16.pdf
Risk Rating	X **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
2.2.7	The Biomass Producer has implemented appropriate control systems and procedures for verifying that air quality is not adversely affected by forest management activities.
Finding	While GBLLC does not conduct forest management activities (prescribed burning) that directly impacts air quality, the Company actively promotes the use of prescribed burning to forest landowners as a sustainable forestry activity through its SFI Fiber Sourcing certification. GBLLC actively educates forest landowners about sustainable forestry by providing educational materials developed for landowners. GBLLC is located in a rural area in GA and purchases fiber from rural areas located in AL, FL, GA and SC. Most of the Company's supply basin is located in areas outside of priority airsheds. AL, FL, GA & SC forest assessment reports state forest activities such as prescribed burning have mixed impacts on the forests. While smoke from prescribed burning can lower air quality temporarily, the lack of burning has a direct negative impact of longleaf
Means of Verification	Employee interviews, SFI Annual Progress Report, state prescribed burning laws, state Forest Action Plans
Evidence Reviewed	• GBLLC-PROC-002 SFI Fiber Sourcing Procedures • Georgia Burn Permit Law O.C.G.A. 12-6-90 • Georgia Prescribed Burning Act O.C.G.A. 12-6-145 to O.C.G.A. 12-6-149 http://www.gfc.state.ga.us/forest-management/prescribed-fire/prescribed-fire-legislation/index.cfm • Georgia's Smoke Management Plan https://epd.georgia.gov/air/prescribed-fire-smoke-management-plan • South Carolina Prescribed Fire Act https://www.scstatehouse.gov/code/t48c034.php • Smoke Management Guidelines Guidelines Guidelines for Vegetative Debris Burning for Forestry, Agriculture, and Wildlife Purposes in the State of South Carolina https://www.state.sc.us/forest/smg05.pdf • Alabama Forest Action Plan http://www.forestry.alabama.gov/Pages/Management/Forest_Action_Plan.aspx • Florida Forest Action Plan • https://www.freshfromflorida.com/content/download/81380/2380181/Florida_Forest_Resource_Strategy_6-18-10.pdf • Georgia Forest Action Plan

	http://www.gfc.state.ga.us/about-us/strategic-plan/georgia-statewide-forest-resources-assessment-and-strategy/index.cfm • South Carolina Forest Action Plan http://www.trees.sc.gov/scfra.htm
Risk Rating	X **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
2.2.8	The Biomass Producer has implemented appropriate control systems and procedures for verifying that there is controlled and appropriate use of chemicals, and that Integrated Pest Management (IPM) is implemented wherever possible in forest management activities (CPET S5c).
Finding	While GBLLC does not conduct forest management activities which use forest chemicals, the Company actively promotes the use of Integrated Pest Management to forest landowners as a sustainable forestry activity through its SFI Sourcing certification. The Company actively educates forest landowners about sustainable forestry by providing educational materials developed for landowners. The Company actively participates on the GA SFI State Implementation Committee (SIC) as part of its SFI Sourcing certification. Participation on this SIC enables GBLLC personnel to interact with University research extension personnel as well as foresters who are actively managing the state's forests. As a result of these interactions, Company personnel keep informed of current forest management trends.
Means of Verification	Employee interviews, GA SIC Meeting Minutes
Evidence Reviewed	• GBLLC-PROC-002 SFI Fiber Sourcing Procedures • GA SIC Meeting Minutes
Risk Rating	X **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
2.2.9	The Biomass Producer has implemented appropriate control systems and procedures for verifying that methods of waste disposal minimise negative impacts on forest ecosystems (CPET S5d).
Finding	State and Federal laws, such as the CERCLA, are in place to protect from oil spills and hazardous substance releases. Access to these laws is available to Company personnel. Company procedures require suppliers to maintain SFI training which includes modules addressing proper waste disposal. Delivered Fiber and Logging & Hauling Agreements have clauses requiring adherence to federal, state and local laws and state BMPs. Company BMP compliance checks also record the existence of trash or oil spills on forest lands.
Means of Verification	State and Federal law, State BMPs, Delivered Fiber and Logging & Hauling Agreements, Master Logger Training records, BMP compliance checks
Evidence Reviewed	• Federal law CERCLA -- 42 US Code Chapter 103: http://www.epa.gov/agriculture/lcla.html • Delivered Fiber and Logging & Hauling Agreements • GBLLC-POL-001 Sustainable Forestry Policy • GBLLC-PROC-002 SFI Fiber Sourcing Procedures • GBLLC-DOC-015 Secondary Supplier Audit Checklist • GBLLC-DOC-016 Tract Inspection Form • Alabama Professional Logging Manager https://www.alaforestry.org/page/PLMGeneral • Florida Master Logger http://floridaforest.org/programs/master-logger/master-logger-search-tool/ • Georgia Master Timber Harvester http://gamth.org/ • South Carolina Timber Operations Professional (TOP) Program https://www.scforestry.org/top-forestry-programs.htm • Alabama Annual BMP Reports http://www.forestry.alabama.gov/Pages/Management/BMP_Practices.aspx • Florida Silviculture Best Management Practices 2017 Implementation Survey Report https://www.freshfromflorida.com/content/download/78966/2320474/SPMP_2017_ImplementationSurveyReport.pdf • Results of Georgia's 2017 Silvicultural Best Management Practices Implementation and Compliance Survey http://www.gfc.state.ga.us/forest-management/water-quality/bmps/BMP%20Survey%202017%20Results%20Report%20Final%20Corrected%20by%20Scott%20Jan112018%20410pm.pdf • Forestry BMPs in South Carolina: Compliance and Implementation Monitoring Report, 2015-2016 https://www.state.sc.us/forest/bmp16.pdf
Risk Rating	X **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
2.3.1	Analysis shows that feedstock harvesting does not exceed the long-term production capacity of the forest, avoids significant negative impacts on forest productivity and ensures long-term economic viability. Harvest levels are justified by inventory and growth data.
Finding	Harvest levels for the GBLLC supply base in AL, FL, GA, & SC do not exceed growth according to USDA Forest Service FIA data. Forest Service annual growth & removals data for the most current year (AL-2018; FL-2016; GA-2017, SC-2017) show a positive average rate of growth to removals of 1.73 for all wood. This annual growth to removals rate is 1.83 for pine & 1.52 for hardwood. USDA Forest Service State of Forest Reports for the four states show growth to removals ratios of 1.77 (AL), 2.55 (FL), 1.37 (GA) & 1.31 (SC) for all wood.
Means of Verification	USDA Forest Service FIA data
Evidence Reviewed	• Forests of Alabama, 2018 https://www.srs.fs.usda.gov/pubs/ru/ru_srs180.pdf • Forests of Florida, 2016 https://www.srs.fs.usda.gov/pubs/ru/ru_srs182.pdf • Forests of Georgia, 2017 https://www.srs.fs.usda.gov/pubs/ru/ru_srs183.pdf • Forest of South Carolina, 2017 https://www.srs.fs.usda.gov/pubs/ru/ru_srs179.pdf
Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
2.3.2	Adequate training is provided for all personnel, including employees and contractors (CPET S6d).
Finding	Company policy requires all professional wood producers delivering wood to complete SFI Implementation Committee approved logger training to achieve SFI Logger Education "trained" status. Company procedures provide guidance on who should be trained and how to check training records. GBLLC's fiber procurement staff is also Master Logger trained.
Means of Verification	Master Logger Training records, Company training records
Evidence Reviewed	• GBLLC-POL-001 Sustainable Forestry Policy • GBLLC-PROC-002 SFI Fiber Sourcing Procedures • GBLLC-DOC-015 Secondary Supplier Audit Checklist • GBLLC-DOC-016 Tract Inspection Form • Alabama Professional Logging Manager https://www.alaforestry.org/page/PLMGeneral • Florida Master Logger http://floridaforest.org/programs/master-logger/master-logger-search-tool/

	• Georgia Master Timber Harvester http://gamth.org/ • South Carolina Timber Operations Professional (TOP) Program https://www.scforestry.org/top-forestry-programs.htm
Risk Rating	X **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
2.3.3	Analysis shows that feedstock harvesting and biomass production positively contribute to the local economy, including employment.
Finding	In addition to the 90 jobs created at the facility, GBLLC has created another market for wood fiber. This additional market only adds to a forest products industry that is a leading industry and employer in both GA and FL. According to recent economic studies, forestry is a $18.5 billion industry in AL (2016), a $16.09 billion industry in FL (2014), a a $21.3 billion industry in GA (2017), and a $21 billion industry in SC (2017) annually .
Means of Verification	Economic studies, Employee interviews
Evidence Reviewed	• Economic Contributions of Alabama Agriculture and Forestry http://www.decision-innovation.com/webres/File/docs/AL-AECS/170619_FINAL%20Alabama%20Ag%20%26%20Forestry%20Economic%20Contribution%20Study.pdf • Economic Benefits of the Forest Industry in Georgia: 2017 http://www.gfc.state.ga.us/utilization/economic-impacts/2017%20Forestry%20Impact%20Report%20Web.pdf • Economic Contribution Analysis of SC's Forestry Sector, 2017 https://www.state.sc.us/forest/economicimpactstudy2017.pdf
Risk Rating	X **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

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

Finding	GBLLC-DOC-018 FSC Controlled Wood/PEFC Due Diligence Risk Assessment using the FSC US Controlled Wood National Risk Assessment (US NRA) and other reputable conservation initiatives identified and mapped the presence or absence of the following high conservation value areas (HCVs) within the company's supply base.
	The FSC US National Risk Assessment (US NRA) has identified the following HCVs that are located near, but not within GBLLC's supply area.
	• HCV1: Species Diversity
	  ○ Central Appalachians Critical Biodiversity Area (CBA)
	  ○ Cheoah Bald Salamander
	  ○ Patch-nosed Salamander
	  ○ Southern Appalachian CBA
	• HCV3: Rare Ecosystems
	  ○ Mesophytic Cove Sites
	There are no World Resources Institute (Global Forest Watch) Frontier Forests or USFS Inventoried Roadless Areas sites within the supply area.
	The following HCVs have been identified and mapped within the company's supply area and are assessed below. HCVs identified and assessed as "specified risk" will include describe measures to mitigate risks to a "low risk" level.
	The FSC US National Risk Assessment (US NRA) has identified the following HCVs that are located within GBLLC's supply area.
	• HCV1: Species Diversity
	  ○ Central Florida CBA
	  ○ Florida Panhandle CBA
	• HCV3: Rare Ecosystems
	  ○ Late Successional Bottomland Hardwoods
	  ○ Native Longleaf Pine Systems
	Within the GBLLC district of origin there are other HCVs associated from the high conservation value assessment frameworks identified below that occur within the GBLLC supply area.
	• IUCN Centre for Plant Diversity (CPD) - There is four CPD sites that may occur within the GBLLC district of origin.
	  1. <u>NA24 - Piedmont granitic rock outcrops</u>
	  A handful of rare species are known to occupy high quality granite outcrops and their occurrences indicate the locations of granite outcrops. They are black-spored quillwort (*Isoetes melanospora*), mat-forming quillwort (*Isoetes tegetiformans*), and harperella (*Ptilimnium nodosum*).
	  2. <u>NA25 – Eastern Serpentine flora</u>
	  Serpentine flora is restricted to soils derived from serpentine rock outcrops found in association with utramafic rock. Plants found in this CPD are specialists. They are adapted to the harsh conditions created by these soils and cannot survive outside of this habitat, making them obligate endemics to serpentine soils.
	  3. <u>NA28 – The Apalachicola River drainage</u>

The Apalachicola River drainage of north-western Florida is one of the classic areas of both endemics and rare plants, such as *Torreya taxifolia* and the associated herb *Croomia pauciflora*, this occurrence is the only record of any member of the family (Croomiaceae) found outside of Asia. The flora contains many endemics and tertiary relicts. The endemics occur primarily in the cool wet flatlands (savannas, seepage slopes and flatwoods).

This river basin is one of the most biologically diverse regions on earth. This diversity includes ecologically significant natural areas. The basin supports habitats that vary from rare steep-head ravines (with the only remaining native *Torreya taxifolia*), to towering limestone bluffs, forested floodplains, and estuaries. The region is home to numerous rare plants including species found nowhere else.

4. NA29 - The Central Highlands of Florida

   The Central Highlands of Florida is an elevated region of Florida that was dry during the most recent interglacial period of the Ice Age. This CPD contains 41 species of endemic vascular plant species found in scrub habitat with an overstory of sand pine. The ecological value of the area is its high level of plant endemism.

- Alliance for Zero Extinction (AZE) - The Torreya State Park, is located within the wood basin in Liberty County, Florida. The park protects the bulk of extant occurrences within the natural range of the Florida Torreya, *Torreya taxifolia*.
- Critical Ecosystem Partnership Fund – North American Coastal Plain was added to the Biodiversity Hotspot list in 2016. The North American Coastal Plain reaches from a small section of northern Mexico along the Gulf of Mexico and up the East Coast to southeastern Massachusetts. Despite the 1,816 endemic plant species and the 1.13 million square kilometers of area, the hotspot has a low level of geographic variety and an unusually low level of elevation change when compared to the other hotspots, leading the scientific community to assume it would be less biodiverse.
- GreenPeace Intact Forest - A Greenpeace Intact Forest is located in Charlton and Ware Counties, GA which is within the GBLLC district of origin. It is almost entirely within the 403,119-acre Okefenokee National Wildlife Refuge which has been described as “one of North America’s most unspoiled, fascinating and precious natural areas”. The Okefenokee Swamp is the largest, intact, un-fragmented, freshwater and black water wilderness swamp in North America. There are 353,000 acres designated as a National Wilderness Area within the refuge.
- World Wildlife Fund (WWF), Global 200 Ecoregion - Southeastern Coniferous & Broadleaf Forests (# 75 in the WWF Global 200)

  The WWF's Global 200 Ecoregions build a framework for describing the most important areas of biodiversity on the planet. The Global 200 encompass almost 50% of life on earth. These 200 areas are places that conservation groups target and discuss with forest products companies about the loss of global, forest biodiversity.

  It is significant at a global scale, but this global ecoregion (#75) is subdivided into two smaller endangered/critical terrestrial ecoregions (Figure 11). These scaled-down subdivisions have significance at the national level.

  - The Southeastern mixed forests (NA0413)
  - The Southeastern conifer forests (NA0529)

    1. The Southeastern mixed forests (NA0413) is a highly degraded ecoregion with more than 99% of the original habitat having been converted to other uses. Settlers within the ecoregion logged and then cleared the land for agriculture. The ecoregion overlaps and is synonymous with the Piedmont physiographic province along the Atlantic Slope and the rest falls into the Coastal Plain on the Gulf Coast. WWF reports that there is little habitat left to conserve in this critical/endangered ecoregion.
    2. The Southeastern conifer forests (NA0529) is the second terrestrial ecoregion that makes up the global ecoregion # 75. The ecoregion extends from the

	Savannah River in Georgia across the coastal plain to the eastern parishes of Louisiana and south into Florida in the vicinity of Lake Okeechobee. This ecoregion is equated with the longleaf pine ecosystem that once spanned a significant portion of the coastal plain. It was dominated by a longleaf pine overstory and an exceptionally diverse array of plants in the understory and especially in the herbaceous layer. The entire ecology of this region was driven by fire which maintained a longleaf pine dominance in the overstory. Many species of birds, reptiles, and amphibians adapted to this environment as well. The red-cockaded woodpecker, gopher tortoise, indigo snake, and flatwoods salamander are some of the more threatened, regulated, and managed of those taxa. • Protected Areas as identified by Protected Areas Database of the United States (PAD-US) represents about 9.2% of the GBLLC supply area. PAD-US is the official inventory of public parks and other protected open space. The spatial data in PAD-US represents public lands held in trust by thousands of national, state and regional/local governments, as well as non-profit conservation organizations.
Means of Verification	Delivered Fiber and Logging & Hauling Agreements, GBLLC-DOC-015 Secondary Supplier Audit Checklist
Evidence Reviewed	• Delivered Fiber and Logging & Hauling Agreements • GBLLC-DOC-018 FSC Controlled Wood/PEFC Due Diligence Risk Assessment • GBLLC-DOC-015 Secondary Supplier Audit Checklist FSC US Controlled Wood National Risk Assessment (US NRA)
Risk Rating	☐ **Low Risk** X **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	<u>Central FL CBA</u> 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. <u>Florida Panhandle CBA</u> 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. <u>Late Successional Bottomland Hardwoods</u> 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. <u>Natural Longleaf Pine Systems</u> 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. <u>IUCN Centres for Plant Diversity (CPD)</u>

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.

<u>Alliance for Zero Extinction</u>

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 <u>will also be used for this site.</u>

<u>GreenPeace Intact Forest</u>

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.

	Indicator
2.4.2	The Biomass Producer has implemented appropriate control systems and procedures for verifying that natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b).
Finding	While GBLLC does not conduct forest management activities that manage fires, pests and diseases, the Company actively promotes the use of prescribed burning and other integrated pest management activities to forest landowners as a sustainable forestry activity through its SFI Sourcing certification. The Company actively educates forest landowners about sustainable forestry by providing educational materials developed for landowners. GBLLC will also work with state forestry agencies, as needed, to address issues of forest health through its participation on the GA SIC. The AL Forestry Commission in its 2018 Annual Report stated there were 1,038 wildfires burning 11,309 acres for the fiscal year. As part of hazard mitigation, total prescribed fire in AL involved 12,601 burns on 944,176 acres. A total of 299 southern pine beetle spots were detected that infested 8,013 pines. More than half of these infestations were located on National Forests in the state. The GA Forestry Commission in its 2016 Annual Report stated there were 2,415 wildfires burning 9,970 acres for the fiscal year. GFC stated 2016 was lowest acreage burned since 1957. GFC foresters incorporated insect, disease, or invasive species advise into 361 management cases involving 9,012 acres for the year. The SC Forestry Commission in its 2016-17 Annual Report stated there were 2,062 wildfires that burned 25,709 acres. Losses due to the Southern Pine Beetle (SPB) were minimal. On-the-ground and aerial surveys detected no signs of death attributable to SPB.
Means of Verification	State forestry agency reports
Evidence Reviewed	• GBLLC-PROC-002 SFI Fiber Sourcing Procedures • GA SIC Committee Meeting Minutes • AL Forestry Commission Annual Report, 2018 http://www.forestry.alabama.gov/Pages/Other/Forms/Annual_Reports/Annual_Report_2018.pdf • GA Forestry Commission Annual Report, 2016 http://www.gfc.state.ga.us/resources/publications/2016%20Annual%20Report.pdf • SC Forestry Commission Annual Report, FY2016-2017 http://www.trees.sc.gov/pubs/ar2016-17.pdf

Risk Rating	☒ **Low Risk**	☐ **Specified Risk**	☐ **Unspecified Risk at RA**
Comment or Mitigation Measure			

	Indicator
2.4.3	The Biomass Producer has implemented appropriate control systems and procedures for verifying that there is adequate protection of the forest from unauthorised activities, such as illegal logging, mining and encroachment (CPETS7c).
Finding	There are appropriate control systems and procedures to ensure that legality of ownership and land use can be demonstrated for the Company's supply area. Illegal harvesting is prohibited by state laws. In most states the timber buyers and/or harvesting companies have to be licensed in order to conduct their business. Evidence indicates that major violations are prosecuted and legal liability is enforced. There is no evidence suggesting that illegal logging is a wide scale problem in the United States (US). The Company has implemented the FSC US Controlled Wood National Risk Assessment (US NRA) which has determined Controlled Wood Category 1: Illegally harvested wood to be "low risk". MREQ-DOC-005 FSC Controlled Wood Risk Assessment supports this low risk assessment through the listing of various applicable laws showcasing the rule of law and public agency governance.
Means of Verification	State laws, Company policy, regional risk assessment, contract provisions with suppliers
Evidence Reviewed	• Delivered Fiber and Logging & Hauling Agreements • GBLLC-DOC-018 FSC Controlled Wood/PEFC Due Diligence Risk Assessment • FSC US Controlled Wood National Risk Assessment (US NRA) • State laws addressing illegal logging and wood theft are as follows: *Alabama Laws* ALA. CODE 1975 § 9-13-62 awards double damages for a trespass that is committed *knowingly and intentionally*." Article 3 - Regulations as to Cutting, Removal, Purchase, etc., of Forest Products § 9-13-60 Unauthorized cutting, removal, transportation, etc., of timber or other forest products § 9-13-61 Charges in affidavits, information or indictments under article; proof of title, etc. § 9-13-62 Liability § 9-13-63 Record of purchases, etc., of manufactured or semi-manufactured forest products; provision of false information to purchasers, etc.; failure to maintain record, etc. § 9-13-64 Powers of State Forestry Commission employees as to enforcement of article, etc. § 9-13-65 Disposition of fines Article 9 - Timber Theft Equipment Condemnation § 9-13-220 Short title § 9-13-221 Seizure of vehicle and equipment upon arrest for certain criminal violations; delivery to district forester § 9-13-222 Report of seizure to district attorney § 9-13-223 Report to district attorney after conviction of person for theft of timber or lumber

§ 9-13-224 Notice to creditors; institution of condemnation proceedings; legal title to equipment
§ 9-13-225 Forfeiture of equipment upon judgment; costs of proceedings; State Forester to keep records
§ 9-13-226 Use of proceeds from sale of equipment; award and distribution determined by State Forester
§ 9-13-227 Provisions cumulative
Logging Notice Act - Act 12-0257

Florida Laws
Title XXXIII Regulation of Trade, Commerce, Investments, and Solicitations
Chapter 536 Timber and Lumber
§ 536.13 Stamp or brand for logs.
Any person engaged in this state in the business of getting out, buying, selling, or manufacturing saw logs, may adopt a stamp or brand for...
§ 536.14 Brands to be recorded by clerk of circuit court.
A person may execute a written declaration that she or he has adopted a brand, describing it, and after acknowledgment of such declaration before any...
§ 536.15 May prevent use by others.
Any person who has had her or his brand recorded in any county, may prevent other persons from using the same in said county by...
§ 536.16 Prima facie evidence of ownership.
Any log found in any county branded with a brand recorded in said county by any person shall be deemed prima facie to be the...
§ 536.17 Where two or more brands the same.
In case there shall be recorded in the same county two or more brands the same, or substantially the same, the brand first recorded shall...
§ 536.18 Defacing the mark or brand of lumber and timber.
If any person shall fraudulently alter, change or deface the duly recorded mark, brand, or stamp of any lumber, logs or timber, or shall fraudulently...
§ 536.19 Unlawful use of recorded log brand or stamp.
Any person who shall unlawfully use any recorded log brand or stamp of another shall be guilty of a misdemeanor of the second degree, punishable...

Georgia Laws
House Bill - HB 790 (A BILL TO BE ENTITLED AN ACT) Signed by Governor: April 29, 2014 Effective Date: July 1, 2014
Provides additional enforcement authority to Georgia Forestry Commission investigators

In cases involving the unauthorized cutting or cutting and carrying away of timber from the property of another damages shall be awarded in accordance with GA. CODE ANN. § 51-12-50.

Amends GA. CODE ANN. § 51-12-50 whereas damages shall be: (1) Treble the fair market value of the trees cut as they stood; (2) Treble the diminished fair market value of any trees incidentally harmed; (3) Costs of reasonable reforestation activities related to the plaintiff's injury; and (4) Attorney fees and expenses of litigation. When defendant is a willful trespasser, plaintiff may receive punitive damages.

Amends GA. CODE ANN. § 12-6-23 relating to wood load ticket required for wood removal, so as to require purchasers to provide the proper tickets to sellers of timber within 20 days

GA Codes Title 12 Forest Resources and other Plant Life

Article 1 – Forestry Resources

GA. CODE § 12-6-23 - Wood load ticket required for wood removal; form; exceptions

GA. CODE § 12-6-24 - Notice of timber harvesting operations - See more at: http://statutes.laws.com/georgia/title-12/chapter-6/article-1/part-1a#sthash.J9TcZrI6.dpuf

South Carolina Laws

S.C. CODE ANN. 1976 § 16-11-580 “if the value of stolen forest products is

	$5,000 or more, a defendant is fined at the discretion of the court, or imprisoned for not more than ten years." This code also allows for seizure and forfeiture of all property used in the timber theft. S.C. CODE ANN. 1976 § 16-13-177 "imposes the forfeiture of property used in a timber trespass if more than $5,000 of timber is taken."
Risk Rating	X **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
2.5.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that legal, customary and traditional tenure and use rights of indigenous people and local communities related to the forest are identified, documented and respected (CPET S9).
Finding	There are appropriate control systems and procedures to verify that legal, customary and traditional tenure and use rights of indigenous people and local communities related to the forest are identified, documented and respected for the Supply Base. According to the Company's FSC Controlled Wood Risk Assessment FSC's Global Forestry Registry the United States can be shown as LOW RISK. They go on to say that "International assessments of violation of traditional or civil rights do not identify the US as problematic. In addition, the US has equitable processes in place to resolve disputes. Native Americans are protected by federal law rather than state law according to the Nonintercourse Act of 1790. The Indian Removal Act of 1830 was intended to promote the voluntary removal of Native Americans out of the US Territory peacefully through treaties and land sales. There are no recognized Native American tribes located within the GBLCC supply area.
Means of Verification	GBLLC-DOC-018 FSC Controlled Wood/PEFC Due Diligence Risk Assessment
Evidence Reviewed	GBLLC-DOC-018 FSC Controlled Wood/PEFC Due Diligence Risk Assessment
Risk Rating	X **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
2.5.2	The Biomass Producer has implemented appropriate control systems and procedures for verifying that production of feedstock does not endanger food, water supply or subsistence means of communities, where the use of this specific feedstock or water is essential for the fulfilment of basic needs.
Finding	GBLLC policy and procedures are place to provide support and guidance on how Company employees and suppliers meet BMPs in the harvest of fiber for the mill thus verifying the production of feedstock does not endanger food, water supply or subsistence means of communities, where the use of this specific feedstock or water is essential for the fulfilment of basic needs. Delivered Fiber and Logging & Hauling Agreements have clauses requiring adherence to state BMPs. Procedures are in place to monitor BMP compliance on tracts delivering fiber directly from the forest. GBLLC will be reaching out to local and regional stakeholders who may have specific needs from the forestlands within their community. Feedback from these stakeholder consultations will be addressed as needed.
Means of Verification	Company policy and procedures, Fiber Purchase Contract, BMP Compliance Checklists, Stakeholder consultation feedback and follow--up
Evidence Reviewed	• GBLCC-POL-001 Sustainable Forestry Policy • GBLLC-PROC-002 SFI Fiber Sourcing Procedures • Delivered Fiber and Logging & Hauling Agreements • GBLLC-DOC-016 Tract Inspection Form • GBLLC-DOC-009 SBP Stakeholder List • Stakeholder Letter Template
Risk Rating	X **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**
Comment or Mitigation Measure	

	Indicator
2.6.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that appropriate mechanisms are in place for resolving grievances and disputes, including those relating to tenure and use rights, to forest management practices and to work conditions.
Finding	GBLLC has complaint mechanisms in place as part of its chain of custody and controlled wood / due diligence procedures. Both procedures provide guidance on when and how the Company respond to grievances and complaints.
Means of Verification	Company procedures, Employee interview
Evidence Reviewed	• GBLLC-PROC-001Chain of Custody Procedures • GBLLC-PROC-003FSC Controlled Wood/PEFC Due Diligence System Procedures • GBLLC-DOC-019Controlled Wood Complaint Report • GBLLC-DOC-020 Controlled Wood Complaints Log
Risk Rating	X **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**

	Indicator
2.7.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that Freedom of Association and the effective recognition of the right to collective bargaining are respected.
Finding	GBLLC recognizes the right to collective bargaining and the Freedom of Association. The Company is FSC Chain of Custody certified and has signed the Self Declaration which demonstrates support of FSC Policy FSC-POL-01-004, Policy for the Association of Organizations with FSC. Further, Federal laws in the United States codified in both the National Labor Relations Act of 1935 and OSHA protect workers' rights to collective bargaining. AL, FL, GA and SC are Right to Work states.
Means of Verification	Employee interviews, FSC Self Declaration, Federal Laws
Evidence Reviewed	• FSC Self Declaration • National Labor Relations Act http://www.nlrb.gov/resources/national-labor-relations-act • 29 CFR 2200.22 https://www.law.cornell.edu/cfr/text/29/2200.22
Risk Rating	X **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**

	Indicator
2.7.2	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not supplied using any form of compulsory labour.
Finding	The United States Federal Constitution 13th Amendment provides "Neither slavery nor involuntary servitude, except as a punishment for crime whereof the party shall have been duly convicted, shall exist within the United States, or any place subject to their jurisdiction" Further, benefiting from compulsory labor in the United States is a federal crime punishable by up to 20 years in prison. The Company also has policies on workers rights, discrimination, etc.
Means of Verification	Company employment policies, Employee interviews
Evidence Reviewed	• Employment Posters • Amendment XIII of the United States Constitution: https://www.law.cornell.edu/constitution/amendmentxiii • 18 US Code 1589 https://www.law.cornell.edu/uscode/text/18/1589
Risk Rating	X **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**

	Indicator
2.7.3	The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is not supplied using child labour.
Finding	State and Federal laws, such as the Equal Employment Opportunity and OSHA, are in place to prohibit child labor.
Means of Verification	Review of Company employment policies, Employee interviews
Evidence Reviewed	• Employment Posters • US Federal Child Labor Laws: http://www.dol.gov/whd/childlabor.htm • GA Child Labor Law http://www.dol.state.ga.us/em/child_labor.htm • FL Child Labor Law http://www.myfloridalicense.com/dbpr/reg/childlabor/ • AL Child Labor Law http://www.labor.alabama.gov/uc/ChildLabor/ • SC Department of Labor https://www.llr.sc.gov/labor/index.asp?file=wages/childlabor.htm
Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**

	Indicator
2.7.4	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not supplied using labour which is discriminated against in respect of employment and occupation.
Finding	State and Federal laws, such as the Equal Employment Opportunity and OSHA, are in place to provide rights to workers.
Means of Verification	Employee interviews, Federal laws
Evidence Reviewed	• Company Employee Handbook • Employee Posters • U.S. Equal Employment Opportunity Commission https://www.eeoc.gov/eeoc/ • Occupational Safety and Health Administration (OSHA) https://www.osha.gov/
Risk Rating	☒ **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**

	Indicator
2.7.5	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is supplied using labour where the pay and employment conditions are fair and meet, or exceed, minimum requirements.

Finding	State and Federal laws, such as the Equal Employment Opportunity and OSHA, are in place to ensure pay and employment conditions are fair.
Means of Verification	Employee interviews, Company Employee Handbook, Federal laws
Evidence Reviewed	• Employee Handbook • Employee Posters • U.S. Equal Employment Opportunity Commission https://www.eeoc.gov/eeoc/ • Occupational Safety and Health Administration (OSHA) https://www.osha.gov/
Risk Rating	X **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**

	Indicator
2.8.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12).
Finding	State and Federal laws, such as OSHA to ensure worker health and safety in the work place. The Company also has policies on workers' health and safety. The Company has a health and safety program that is managed by dedicated personnel. This program includes the use of personal protective equipment and safety meetings.
Means of Verification	Training records, Employee interviews
Evidence Reviewed	• Company Safety Manual • Safety Training records • Safety Inspections
Risk Rating	X **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**

	Indicator
2.9.1	Biomass is not sourced from areas that had high carbon stocks in January 2008 and no longer have those high carbon stocks.
Finding	USDA Forest Service FIA data on carbon storage for the Company's supply area was determined to be 1.184 billion short tons in 2008 (AL-2008; FL-2009; GA-2008; SC-2008). In 2016-18 (AL-2018; FL-2016; GA-2017; SC-2017) the supply area was determined to have 1.267 billion short tons of carbon stock. This accounts for 81.8 billion short tons of more carbon storage (1.56% annual increase) in 8-10 years.
Means of Verification	USDA Forest Service FIA data
Evidence Reviewed	• Carbon Reports from USDA Forest Service Forest Inventory & Analysis website https://www.fia.fs.fed.us/tools-data/

Risk Rating	X **Low Risk**	☐ **Specified Risk**	☐ **Unspecified Risk at RA**
Comment or Mitigation Measure			

	Indicator
2.9.2	Analysis demonstrates that feedstock harvesting does not diminish the capability of the forest to act as an effective sink or store of carbon over the long term.
Finding	USDA Forest Service FIA data on carbon storage for the Company's supply area was determined to be 1.184 billion short tons in 2008 (AL-2008; FL-2009; GA-2008; SC-2008). In 2016-18 (AL-2018; FL-2016; GA-2017; SC-2017) the supply area was determined to have 1.267 billion short tons of carbon stock. This accounts for 81.8 billion short tons of more carbon storage (1.56% annual increase) in 8-10 years.
Means of Verification	USDA Forest Service FIA data
Evidence Reviewed	• Carbon Reports from USDA Forest Service Forest Inventory & Analysis website https://www.fia.fs.fed.us/tools-data/
Risk Rating	X **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**

	Indicator
2.10.1	Genetically modified trees are not used.
Finding	The Company has implemented the FSC US Controlled Wood National Risk Assessment (US NRA) which has determined Controlled Wood Category 5: Wood harvested in violation of traditional and human rights to be "low risk". There are no known operational plantings on GMO trees in the US.
Means of Verification	FSC US Controlled Wood National Risk Assessment (US NRA)
Evidence Reviewed	FSC US Controlled Wood National Risk Assessment (US NRA)
Risk Rating	X **Low Risk** ☐ **Specified Risk** ☐ **Unspecified Risk at RA**