

# NSF International Evaluation of LJR Forest Products Compliance with the SBP Framework: Public Summary Report

First Surveillance Audit

[www.sustainablebiomasspartnership.org](http://www.sustainablebiomasspartnership.org)



## Completed in accordance with the CB Public Summary Report Template Version 1.0

*For further information on the SBP Framework and to view the full set of documentation see  
[www.sustainablebiomasspartnership.org](http://www.sustainablebiomasspartnership.org)*

### *Document history*

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# 1 Overview

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Primary contact for SBP: Norman Boatwright, [nboatwright12@gmail.com](mailto:nboatwright12@gmail.com) , 843.229.1851

Report completion date: 22/Aug/2016

Report authors: Norman Boatwright, LA and Mark Lutz, GHG Auditor

Certificate Holder: LJR Forest Products, 1377 Old Nunez Rd. Swainsboro, Georgia 30401

Producer contact for SBP: Mr. Lige Moore 912-562-3446 [Ljr04@yahoo.com](mailto:Ljr04@yahoo.com)

Certified Supply Base: Selected Counties in Georgia and South Carolina

SBP Certificate Code: SBP-02-13

Date of certificate issue: 28/Nov/2016

Date of certificate expiry: 27/Nov/2021

Indicate where the current audit fits within the certification cycle				
Main (Initial) Audit	First Surveillance Audit	Second Surveillance Audit	Third Surveillance Audit	Fourth Surveillance Audit
<input type="checkbox"/>	<b>X</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## 2 Scope of the evaluation and SBP certificate

The manufacture of wood pellets and transport by truck to the ports of Brunswick and Savannah, Georgia including Standards 1, 2, 4 and 5 for the Swainsboro, Georgia facility. The SBP Standard certification number is SBP-02-13.

### 3 Specific objective

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

## 4 SBP Standards utilised

### 4.1 SBP Standards utilised

- Standard 1: Feedstock Compliance Standard, Version 1.0, March 2015
- Standard 2: Verification of SBP-Compliant Feedstock, Version 1.0, March 2015
- Standard 4: Chain of Custody, Version 1.0, March 2015
- Standard 5: Collection and Documentation of Data. Version 1.0 March 2015

These documents can be reviewed at:

<http://www.sustainablebiomasspartnership.org/documents/standards-documents/standards> .

### 4.2 SBP-endorsed Regional Risk Assessment

Not applicable.

## 5 Description of Biomass Producer, Supply Base and Forest Management

### 5.1 Description of Biomass Producer

The Company supplies wood fiber to pellet mill located in Swainsboro, Georgia. The Company sources pine sawmill residuals from the states of Georgia and South Carolina. The procurement organization consists of a single procurement manager.

#### Inputs:

The Company sources 100% of its input material as pine sawmill residuals. Approximately 78% as green chips, 6% as green sawdust and the remaining as dry shavings. The sawmills that supply the Company are not CoC certified so all of the input material is FSC/PEFC controlled.

#### Outputs:

SBP Compliant Biomass and EUTR Compliant Biomass

### 5.2 Description of Biomass Producer's Supply Base

LJR Forest Products' wood pellet production plant is located in Swainsboro, Georgia. The facility sources from a largely rural area where forestry and agriculture (e.g. forests, crops, and cattle) are prevalent and are the primary sources of income for workers and the local communities. The supply base consists of pine forests in the Piedmont, South Atlantic Coastal Plain and Mid-Atlantic Coastal Plain Regions. No hardwoods are sourced.

The States of Georgia and South Carolina have large and well-funded State Forestry Commissions that administer a comprehensive set of programs including: landowner outreach and extension, forest inventory and analysis, forest fire and pest prevention, BMP implementation and monitoring, smoke management planning and scheduling, forest resource and wildlife assessments and action plans, and other forest sustainability programs.

The Company sources pine sawmill residuals from approximately fourteen (14) suppliers. Secondary feedstock will account for 100% of the total feedstock.

Include a link to the Supply Base Evaluation on the Biomass Producer's own website (*this will be done when the BP obtains certification*).

### 5.3 Detailed description of Supply Base

- a. Total Supply Base area (ha): 10,007,260 ha Georgia, 5,250,458 ha South Carolina
- b. Tenure by type (ha): 8,930,272 ha Private Land – Georgia, 1,076,988 ha Public Agencies – Georgia,



- 4,604,628 ha Private Land – South Carolina, 645,830 ha Public Agencies – South Carolina
- c. Forest by type (ha): 4,488,804 ha Temperate Pine Forests – Georgia, 1,105,434 ha Temperate Oak-Pine – Georgia, 2,516,234 ha Temperate Pine Forests – S Carolina, 593,837 ha Temperate Oak-Pine – S Carolina
  - d. Forest by management type (ha): 3,127,355 ha Planted Forest – Georgia, 6,879,904 ha Managed Natural Forest – Georgia, 1,345,347 ha Planted Forest – South Carolina, 3,905,111 ha Managed Natural Forest – S Carolina
  - e. Certified forest by scheme (ha): Certified Forest Content is not reported by suppliers and is therefore not tracked or accounted for across the Supply Base, given the predominance of residual softwood suppliers. Uptake of forest certification within the sawmill sector in the Southeast U.S. has not developed and few, if any, mills are Chain of Custody certified. All fiber material is scoped within the FSC/PEFC Controlled Wood Risk Assessment and is considered "controlled material."

## 5.4 Chain of Custody system

The Company is FSC/PEFC Chain of Custody certified: NSF-PEFC-COC-C0243817 expiry April 19, 2020, SCS-COC-005243 expiry April 28, 2020 and has used the management and control systems required for these CoC certifications to implement the SBP program. The CoC certificate is a single site. Pellets are manufactured at the facility and trucked to ports in Brunswick and Savannah, GA. Ownership of the pellets transfers to another entity when the trucks are unloaded at the port.

## 6 Evaluation process

### 6.1 Timing of evaluation activities

Date	Location/Method	Activity	Participants
3/3/2017	Planning call	Set audit date & develop audit plan - 1 hour	Norman Boatwright and Lige Moore
3/27/2017	Surveillance audit to Standards 1, 2, 4 and 5	Swainsboro, GA - 16 hours	Norman Boatwright and Lige Moore
Sep-17	Email & phone calls	GHG data verification follow up and report completion - 12 hours	Mark Lutz & Lige Moore
10/20/2017	Office	Finalize report - 4 hours	Boatwright

### 6.2 Description of evaluation activities

NSF initiated the SBP audit process with a planning call to confirm the scope of the audit, determine whether any changes had occurred in the Company's policies and procedures and set the audit dates. NSF then prepared a detailed audit plan and conducted the SBP Surveillance Audit of conformance to the SBP Standards with focus on the SBE/SBR and chain of custody requirements. A report was prepared and final approval was done by an independent Certification Board Member assigned by NSF. Follow-up or Surveillance Audits are required by the SBP Standards. The next Surveillance Audit is scheduled for the March 2018.

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

During the audit NSF reviewed a sample of the written documentation assembled to provide objective evidence of SBP Conformance. NSF also selected field sites for inspection based upon the risk of environmental impact, likelihood of occurrence, special features, and other criteria outlined in the NSF SBP SOP. NSF also selected and interviewed stakeholders such as contract loggers, wood suppliers and other interested parties, and interviewed employees within the organization to confirm that the SBP Standard was understood and actively implemented.

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

## 6.3 Process for consultation with stakeholders

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

## 7 Results

### 7.1 Main strengths and weaknesses

The Company is certified to the FSC/PEFC Chain of Custody Standards and the FSC Controlled Wood and PEFC Controlled Sourcing Standards. Accordingly, it has developed and refined its procedures to enable it to track fiber from the district of origin and throughout the supply system and manufacturing process. Due to certification to the referenced standards, the Company has already implemented mitigation measures.

Strengths include the ability to track residual material back to the source mill. The Company's defined supply basin extends well beyond the normally accepted haul radii for its residual supplier mills to ensure the district of origin of the fiber is within the supply basin. The Company has exhibited a strong corporate commitment to source fiber sustainably.

The audit did not identify any weaknesses.

### 7.2 Rigour of Supply Base Evaluation

The Company has conducted a rigorous Supply Base Evaluation. Risk was designated low for all core indicators as existing mitigation measures are in place. Due to its previous certifications, the Company had already built mitigation measures into its procedures and fiber sourcing programs.

In addition, the Company has chosen to define the geographical scope of the SBE to extend well beyond the normally accepted haul radii for its residual supplier mills to ensure the district of origin of the fiber is within the supply basin.

### 7.3 Compilation of data on Greenhouse Gas emissions

The Company's GHG data is complete and accurate. Many of the data requests required by Standard 5 at the time of the audit were unclear and not well defined. These issues were discussed during the GHG audit and several additional data requests/clarifications were requested by the GHG auditor. These requests were promptly met by the Company.

### 7.4 Competency of involved personnel

The Company retained R.S. Berg & Associates, Inc. to prepare the SBP Program and Procedures, including conducting the Supply Base Evaluation & Risk Assessment. R.S. Berg & Associates, Inc. has provided consulting assistance to over two hundred and eighty (280) forestry organizations in North America and has conducted over forty (40) independent and internal audits to the FSC, SFI, PEFC and American Tree Farm System Standards. Resume, Client List and other information is available at the following website: <http://www.rsbergassoc.com/>

The Company's management and control systems for SBP are the same as those used to meet the FSC/PEFC Chain of Custody and FSC Controlled Wood requirements, which have been in place since 2015. Key personnel tasked with implementing the Company's management and control systems relating to SBP compliance are well trained and competent. Their knowledge of SBP requirements is strong. This is a new standard, so any relevant experience is limited to the pre-existing CoC and Controlled Wood standards.

## 7.5 Stakeholder feedback

Stakeholders were not engaged as this is a surveillance audit. The Company has not received any complaints relative to SBP.

## 7.6 Preconditions

Surveillance audit so this is NA.

## 8 Review of Biomass Producer's Risk Assessments

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

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

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

## 9 Review of Biomass Producer's mitigation measures

As discussed previously, due to the existing FSC Controlled Wood and PEFC Controlled Material certifications, the Company had already implemented mitigation measures to bring all indicators to low risk.

These existing mitigation measures include the use of a Wood Purchase Agreement that all suppliers must sign and the supplier audit program. The Agreement has a clause that prohibits the supplier from obtaining fiber from land with high biodiversity value, high carbon stock or peat land where those values could be significantly threatened.

## 10 Non-conformities and observations

No non-conformities or observations were issued. The Company has used its CoC procedures and management systems to implement SBE in a very effective manner.



## 11 Certification decision

Based on the approval of the SBP surveillance audit report by NSF CB Reviewer Anne Marie Kittredge, LJR Forest Products has been approved for continuing certification by NSF as of (31 October 2017) as meeting the requirements of Sustainable Biomass Partnership (SBP) March 2015 Standards 1, 2, 4 and 5.

Original certification granted: 28-Nov-16

Date of certificate expiry: 27-Nov-21

## 12 Surveillance updates

### 12.1 Evaluation details

NSF initiated the SBP audit process with a planning call to confirm the scope of the audit, determine whether any changes had occurred in the Company's policies and procedures and set the audit dates. NSF then prepared a detailed audit plan and conducted the SBP Surveillance Audit of conformance to the SBP Standards with focus on the SBE/SBR and chain of custody requirements on March 27-28, 2017. A report was prepared and final approval was done by an independent Certification Board Member assigned by NSF. Follow-up or Surveillance Audits are required by the SBP Standards. The next Surveillance Audit is scheduled for March 26-27, 2018.

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

During the audit NSF reviewed a sample of the written documentation assembled to provide objective evidence of SBP Conformance. NSF also selected field sites for inspection based upon the risk of environmental impact, likelihood of occurrence, special features, and other criteria outlined in the NSF SBP SOP. NSF also selected and interviewed stakeholders such as contract loggers, wood suppliers and other interested parties, and interviewed employees within the organization to confirm that the SBP Standard was understood and actively implemented.

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

### 12.2 Significant changes

None.

### 12.3 Follow-up on outstanding non-conformities

Non-conformities were not identified during the evaluation audit.

### 12.4 New non-conformities

None.

### 12.5 Stakeholder feedback

NA. Stakeholder consultation was not necessary as there were no changes to the supply basin.

## 12.6 Conditions for continuing certification

None.

## 12.7 Certification recommendation

Based on the approval of the SBP surveillance audit report by NSF CB Reviewer Anne Marie Kittredge, the Company has been approved for continuing certification by NSF as of 31/10/2017 as meeting the requirements of Sustainable Biomass Partnership (SBP) March 2015 Standards 1, 2, 4 and 5.