

# NSF International Evaluation of Georgia Biomass, LLC Compliance with the SBP Framework: Public Summary Report

## Second Surveillance Audit

[www.sbp-cert.org](http://www.sbp-cert.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.sbp-cert.org](http://www.sbp-cert.org)*

### *Document history*

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# 1 Overview

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Report completion date: 10/Jan/2017

Report authors: Norman Boatwright, Lead Auditor, Tina Sentner, GHG Auditor and Anne Marie Kitteridge, Technical Reviewer

Certificate Holder: Georgia Biomass LLC, 3390 Industrial Blvd., Waycross, GA 31503

Producer contact for SBP: Barry Parrish, [barry.parrish@gabiomas.com](mailto:barry.parrish@gabiomas.com), 912-222-9533

Certified Supply Base: USA: Select Counties in the States of Alabama, Florida and Georgia

SBP Certificate Code: SBP-02-03

Date of certificate issue: 21/Jan/2016

Date of certificate expiry: 17/Jan/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"/>	<input type="checkbox"/>	<b>X</b>	<input type="checkbox"/>	<input type="checkbox"/>

## 2 Scope of the evaluation and SBP certificate

The manufacture of wood pellets, rail transport to the port of Savannah, Georgia and the trading of wood pellets, including Standards 1, 2, 4 and 5 for the Waycross, Georgia facility. The SBP Standard certification number is SBP-02-03.

This certificate covers the production, distribution and trading of wood pellets, at the Georgia Biomass facility in Waycross, GA and rail transportation to East Coast Terminal in Savannah, GA. It also covers a Supply Base Evaluation for the sourcing of feedstock from selected counties in the states of Alabama, Florida and Georgia.

### 3 Specific objective

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

## 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

Georgia Biomass supplies wood fiber to its pellet mill located in Waycross, Georgia. The company sources roundwood, in-woods chips, sawmill residuals and hog fuel from the states of Alabama, Georgia and Florida. Pine is the primary component although some hardwood is utilized. The fiber procurement organization consists of a manager, two foresters and administrative personnel.

Inputs: 26% of the input material is SFI and ATFS certified (both PEFC endorsed) and the remaining is FSC/PEFC controlled.

#### Outputs:

SBP Compliant Biomass

EUTR Compliant Biomass

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

Georgia Biomass, LLC (GBLLC) purchases softwood and hardwood wood fiber from 128 counties: five in Alabama, 38 in Florida and 85 in Georgia within the United States. Forests are the predominant land use in this supply base (68%) Pine forests comprise the largest forest type (51%) of the supply area's forest followed by hardwood forests (37%). The pine/oak forest comprises 10% of the supply area's forest type while about 2% of the forest is considered non-stocked. About 59% of the supply area's forests are managed as natural forests (3.16 MM hectares) while the remaining 41% of the supply area's forests are artificially regenerated (2.17 MM hectares).

GBLLC purchases its fiber primarily from private landowners. Small landowners provide 58% of the fiber furnish while large private landowners provide the remaining 42%. No fiber originates from public lands.

The forest products industry is a very large part of the area's economy and is one of the top industries within both states generating \$16.9 billion in GA and \$14.5 billion in FL annually. In GA there are 12 pulp/paper manufacturing facilities and 10 bioenergy facilities within the state providing 48,740 jobs. In 2014, the bioenergy industry provided 672 jobs in Georgia. In FL there are 67 wood products facilities and 6 pulp/paper manufacturing facilities within the state. The GBLLC pellet mill is one of the largest in the United States.

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 elliotii*) and longleaf pine (*Pinus palustris*). Primary species for the hardwood forests include oak (*Quercus spp*), sweetgum (*Liquidambar styraciflua*), maple (*Acer spp*), sycamore (*Platanus occidentalis*) and blackgum (*Nyssa sylvatica*). No species purchased at the GBLLC facility is listed on the CITES list. Longleaf pine was recently added to the IUCN Red List.

Pine forests are typically managed on an even-aged basis with a rotation age of 25 to 30 years. During this rotation the pine stand may be thinned one or two times during the middle of the rotation with a final harvest completing the rotation. Most pine forests are artificially regenerated with pine seedlings planted by hand to defined stand densities. Chemical and/or mechanical site preparation is typically used to manage the less desirable hardwood species and herbaceous species at stand establishment. Chemical treatments are minimal or below label rates; do not kill all competing species and last about two years so the pine seedlings can become established. Fertilizers are not normally applied to these forests due to costs. Some private investment groups (REITS, TIMOs) may apply fertilizers on forests which are more intensively managed. These intensively managed pine forests represent a very small percentage of the overall pine forests in the supply basin.

Hardwood forests can be managed either as even-aged or uneven-aged stands. Most hardwood stands are 40 to 50 years when harvested if managed as an even-aged stand. No site preparation or fertilizers are used on hardwood forests.

The vast majority of forests in the GBLLC supply area are managed according to state forestry best management practices (BMPs). While these BMPs are normally voluntary, all GBLLC suppliers are contractually required to abide by them. Supplier compliance with state BMPs is verified by periodic audits conducted by GBLLC. GBLLC's Sustainable Forestry Initiative (SFI) fiber sourcing certification and procedures require all harvesting professionals to maintain continuing education training on BMPs and other sustainable forestry issues such as wildlife habitats and biodiversity and aesthetics. Overall BMP compliance reported for 2015 was 91.13% (GA), 99.3% (FL), and 98.2% (AL).

Sustainable forestry certification is present in GBLLC's supply with the company purchasing 26% of its fiber as certified (SFI – 19% and ATF – 6.9%). No FSC certified fiber has been purchased to date.

GBLLC purchases pine and hardwood roundwood as its primary feedstock from about 45 wood suppliers. Secondary feedstock is received in the form of pine and hardwood residual chips from about 32 sawmill suppliers. Pine roundwood accounts for the majority (70%) of the total feedstock with hardwood roundwood, sawdust, shavings, and residual chips comprising the remainder. Hardwood roundwood accounts for less than 1% of the total feedstock. Roundwood comes from small forest landowners (58%) and large forest landowners (42%). No roundwood comes from public ally owned sources.

The Company's Public Summary Report can be reviewed at: [http://www.gabiomass.com/wp-content/uploads/2016/09/studio\\_585c45b6d2a251408211482445766.pdf](http://www.gabiomass.com/wp-content/uploads/2016/09/studio_585c45b6d2a251408211482445766.pdf)

## 5.3 Detailed description of Supply Base

- a. Total Supply Base area (ha): 5,878,843 ha (Forested lands)
- b. Tenure by type (ha): Privately owned (5,243,750 ha) / Public 635,092 ha)
- c. Forest by type (ha): Temperate (5,878,843 ha)
- d. Forest by management type (ha): Plantation (2,130,885 ha) / Managed Natural (3,624,083 ha) /

- Natural (136,183 ha)
- e. Certified forest by scheme (ha): SFI (2,931,384 ha - total) (GA – 957,162 ha) (FL – 760,642 ha)  
SFI (AL – 1,191,750 ha)  
ATF (GA state-wide 778,695 ha) / ATF (FL state-wide 385,487 ha)  
ATF (AL state-wide 1,117,865 ha)

A quantitative description of the Supply Base can be found in the Biomass Producer's Public Summary Report at the link provided above.

## 5.4 Chain of Custody system

The Company is FSC/PEFC Chain of Custody certified. The CoC certificates cover the Waycross, GA facility and the port facility located in Savannah, GA.

The following outsourcer is covered under the Company's CoC certifications:

- East Coast Terminal, Inc. is a port facility located in Savannah, GA that stores and loads pellets onto ocean going ships.

The certification body certifying the Company to the FSC/PEFC chain of custody standards classified the outsourcer as low risk. For SBP, NSF classified the outsourcer as high risk to ensure that the chain of custody control and outsourcing procedures were being implemented properly. An on-site visit was conducted.

At the port facility, employees were interviewed, the material receipt and placement processes were observed and material balance reports were reviewed. The Company will also purchase pellets from other suppliers, have them delivered to the port facility and mix them with the Company's pellets. The Company accepts SBP-compliant pellets from its suppliers and has developed a procedure to mass balance the GHG data.

## 6 Evaluation process

### 6.1 Timing of evaluation activities

Date	Location/Method	Activity	Participants
30-May-17	Planning call	Set audit date & develop audit plan - 1 hour	Norman Boatwright and Barry Parrish
August 1-3, 2017	Surveillance audit to Standards 1, 2, 4 and 5	Waycross, GA - 16 hours	Norman Boatwright, Barry Parrish & Staff
October 10 thru November 6, 2017	Email & phone calls	GHG data verification follow up and report completion - 12 hours	Mark Lutz & Barry Parrish
12/7/2017	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 week of July 31, 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

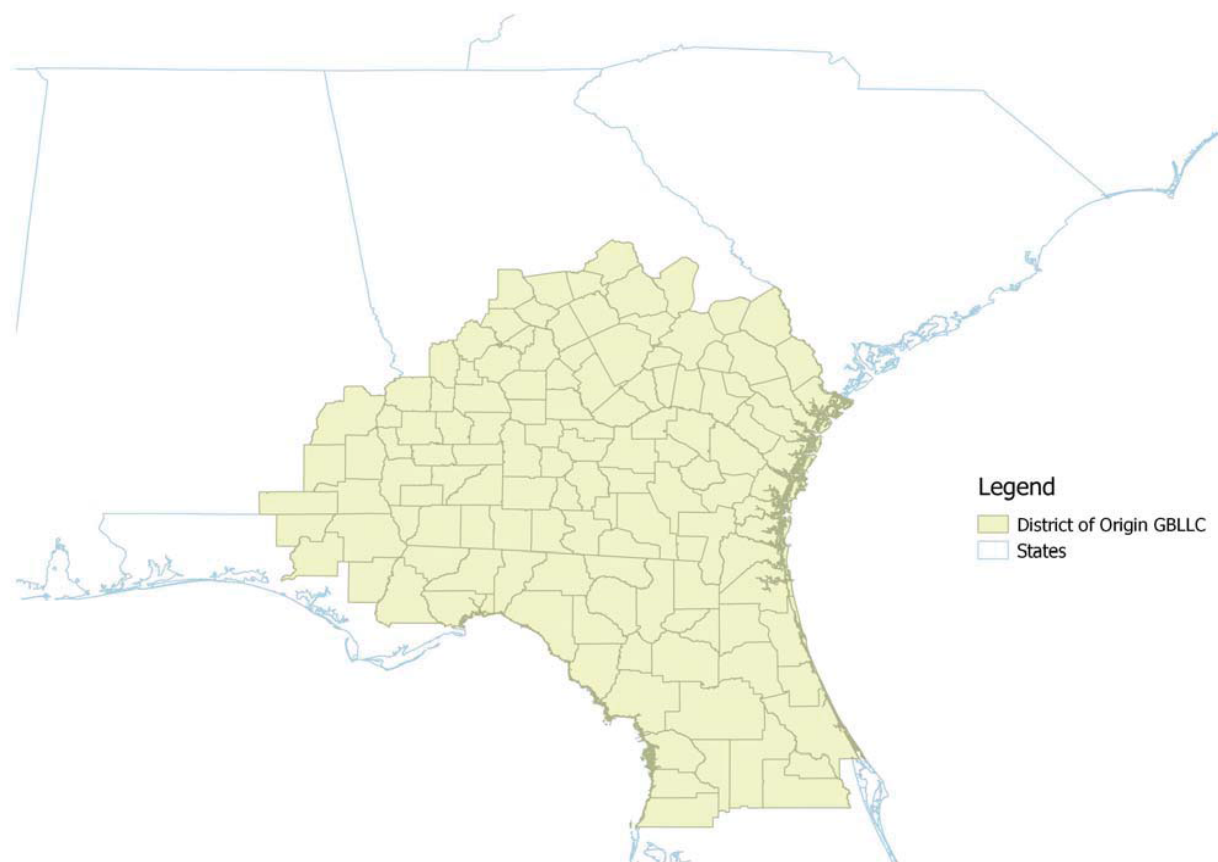
Georgia Biomass has been certified SFI Fiber Sourcing Standard, to the SFI/PEFC/FSC Chain of Custody Standards and to the FSC Controlled Wood and PEFC Controlled Sourcing Standards. Accordingly, it has developed and refined its procedures to enable it to track fiber from the district of origin and throughout the supply system and manufacturing process.

Strengths include the ability to track roundwood back to the tract it was harvested from and the process used to determine and confirm the district of origin for residual material. The strong corporate commitment to source fiber sustainably is an additional strength.

### 7.2 Rigour of Supply Base Evaluation

The Company has conducted a rigorous Supply Base Evaluation. Risk was designated low for all core indicators. The Company has been PEFC/FSC Chain of Custody certified since 2011 and has basically built mitigation measures into its procedures and fiber sourcing programs.

In addition, the Company has chosen to define the geographical scope of the SBE as selected counties in the states of Alabama, Florida and Georgia to ensure that fiber is not received from outside the SBE scope area. The actual wood draw area consists of an area defined as one hundred road miles from the pellet mill.



### 7.3 Compilation of data on Greenhouse Gas emissions

The Company's GHG data is complete and accurate. Additional data clarification requests were promptly met by the Company and no issues were identified.

### 7.4 Competency of involved personnel

The SBE was performed by Gary Boyd, a well-known Forestry Program certification consultant, in consultation with key Company employees. Garry attended an SBP training session.

The Company's management and control systems for SBP are the same as those used to meet the SFI/PEFC/FSC Chain of Custody and FSC Controlled Wood requirements, which have been in place since 2011. Key personnel tasked with implementing the Company's management and control systems relating to SBP compliance are well trained and competent, with strengths in markets, silviculture, management, harvesting, and conservation issues. Their knowledge of SBP requirements is strong.

## 7.5 Stakeholder feedback

No change in the supply basin so stakeholders were not engaged.

## 7.6 Preconditions

No preconditions were identified.



## 8 Review of Biomass Producer's Risk Assessments

The NSF Forestry Program Manager was the Lead Auditor for this surveillance audit. He is familiar with the Company's forest certification programs as well as issues related to forestry, conservation and biodiversity in the south-eastern US. The Lead Auditor reviewed the risk assessment and followed standard audit trails to confirm sensitive or important elements of the approach. He used his pre-existing knowledge, web searches, and his experience with other forest certification risk assessments to assess the risks.

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

Mitigation Measures are not necessary because the risk rating is low for all indicators. Due to the Company's certification to the above referenced Standards, the Company has built mitigation measures into its procedures and fiber sourcing programs.

## 10 Non-conformities and observations

None.

## 11 Certification decision

Based on the approval of the SBP surveillance audit report by NSF CB Reviewer Anne Marie Kittredge, Georgia Biomass, LLC has been approved for continuing certification by NSF as of 25/01/2016 as meeting the requirements of Sustainable Biomass Partnership (SBP) March 2015 Standards 1, 2, 4 and 5.

Original certification granted 21/01/2016

The expiration date of the certificate is 17/01/2021.

## 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 August 1-3, 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 the week of July 31, 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

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

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

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

A major non-conformance was issued during the 2016 audit because the Company had expanded its supply basin in order to include additional sawmill residual suppliers and had not used the required stakeholder engagement process. The Company initiated the stakeholder engagement and NSF followed up with the CB stakeholder engagement and the CAR was closed.

### 12.4 New non-conformities

No new non-conformities were issued.

## 12.5 Stakeholder feedback

Stakeholders were not engaged for this surveillance audit.

## 12.6 Conditions for continuing certification

There are no outstanding conditions.

## 12.7 Certification recommendation

Based on the approval of the SBP surveillance audit report by NSF CB Reviewer Anne Marie Kittredge, Westervelt Renewable Energy, LLC has been approved for continuing certification by NSF as of 22/12/2017 as meeting the requirements of Sustainable Biomass Partnership (SBP) March 2015 Standards 1, 2, 4 and 5.