

# SBP

Sustainable Biomass Partnership

## PricewaterhouseCoopers LLP Evaluation of Pinnacle Renewable Energy Inc (Lavington Division) Compliance with the SBP Framework: Public Summary Report

[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

CB Name and contact: PricewaterhouseCoopers LLP, PwC Place, 250 Howe Street, Suite700, Vancouver, B.C., Canada V6C 3S7

Primary contact for SBP: Mike Harris, Practice Leader, 604-806-7711, mike.harris@ca.pwc.com

Report completion date: 18/Dec/2017

Report authors: Cheryl Woode, Shawn Ellsworth

Certificate Holder: Pinnacle Renewable Energy Inc. - Lavington, 9900 School Road Coldstream, British Columbia V1B 3C7, Canada

Producer contact for SBP: Joseph Aquino  
8545 Willow Cale Rd. Prince George, BC V2N 6Z9  
(250) 562-5562 Ext.2220  
Joseph.Aquino@pinnaclepellet.com

Certified Supply Base: Currently not applicable for the Lavington supply base area

SBP Certificate Code: SBP-03-15

Date of certificate issue: 18/Dec/2017

Date of certificate expiry: 17/Dec/2022

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 checked="" type="checkbox"/> *	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**\*Including a follow-up Assessment**

## 2 Scope of the evaluation and SBP certificate

**Scope of the Evaluation:** The initial evaluation was to assess the pellet mill's conformance to SBP Standards 2, 4, and 5 and the respective Instruction Notes and Documents. The evaluation included an on-site visit to the pellet mill and field visits with suppliers in Coldstream, British Columbia, Canada, and port visits to Prince Rupert, British Columbia and Vancouver, British Columbia.

Pinnacle Renewable Energy Inc. has been working on a Supply Base Evaluation (SBE) to increase their ability to supply SBP Compliant fibre; however, the SBE has not yet been fully developed. Therefore, a Supply Base Evaluation is not included in the scope of the initial evaluation.

**Certification scope:** production of wood pellets, for use in energy production, at Pinnacle Renewable Energy Inc.'s - Lavington pellet mill and transport to Westview Wood Pellet Terminal and Fibreco Export Inc. in for storage, aggregation, vessel loading and shipping. The scope of the certificate excludes a Supply Base Evaluation/ Energy and Carbon Balance Calculation.

**SBP certificate:** SBP-03-15

### 3 Specific objective

The primary objectives of the assessment were:

- Collecting assessment information through documents, interviews and on-site observations with the biomass producer staff and suppliers;
- Confirming that information and comparing it to the Sustainable Biomass Partnership (SBP) Standards 2,4,5, (V1.0) (the “Standards”), the Client’s documented processes and public documents, and PwC’s requirements (the “Requirements”);
- Generating assessment findings; and
- Preparing the Assessment report and SBP Public Summary.

## 4 SBP Standards utilised

### 4.1 SBP Standards utilised

The following SBP Standards were utilized:

- Standard 2: Verification of SBP – Compliant Feedstock. Version 1.0. 26 March 2015
- Standard 4: Chain of Custody. Version 1.0. 26 March 2015
- Standard 5: Collection and Communication of Data. Version 1.0. 26 March 2015

The above Standards can be accessed or requested from SBP at the following website:  
<https://sbp-cert.org/>

### 4.2 SBP-endorsed Regional Risk Assessment

Not applicable - No SBP endorsed Regional Risk Assessment was used for this assessment.

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

### 5.1 Description of Biomass Producer

Pinnacle Renewable Energy Inc. (“Pinnacle”) is a long-established wood pellet producer in Western Canada founded in the community of Quesnel, British Columbia, Canada more than 25 years ago.

Today, Pinnacle owns and operates seven pellet plants, one deep-water port and leases space at another port, all in the Canadian province of British Columbia (BC). Collectively the pellet plants produce more than one and a half million tonnes annually. All Pinnacle plants operate 24 hours a day, seven days a week. The pellet plants are located in the BC communities of Houston, Burns Lake, Strathnaver, Quesnel, Williams Lake, Armstrong and Coldstream. In total, more than 250 people are employed by Pinnacle in those communities.

The Lavington pellet mill (“Lavington”) is located in Coldstream, BC. The Lavington pellet mill has a production capacity of 270,000 metric tons of pellets per year. Pellets produced at this plant are typically transported by rail to the leased port in Vancouver, BC (“Fibreco Export Inc.” or “Fibreco”), for export to European utilities.

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

Most of the fibre supplied to Pinnacle Renewable Energy Inc. originates from the interior forests in the Province of British Columbia, Canada. BC’s land base is 95 million hectares of which 62% or (55 million hectares) is forested, but only 24% of the forest is available for harvest. Approximately 83% of BC’s forests are coniferous leading, 6% are mixed forests containing both coniferous and deciduous species, and 6% are deciduous leading. Six million hectares (approximately 15%) of BC’s forests are in protected areas and 13% of all forests in protected areas are 141-250 years old. BC is Canada’s most ecologically diverse province containing temperate rainforests, dry pine forests, alpine meadows, and other forested ecosystems.

95% of BC’s forests are a government/publically owned resource. As such, BC is a global leader in terms of forest legislation and certification. Approximately 52 million hectares of forest in BC is covered by third-party certification (e.g. SFI, FSC, and CSA) or meets specific criteria required in environmental management systems (e.g. ISO 14001). Approximately 95% of the fibre procured by Pinnacle is forest management certified.

A small portion of secondary fibre received at Lavington originates from the United States bordering southern British Columbia, Oregon, Washington, Idaho and Montana. The fibre is considered SBP-controlled as it is received from a PEFC certified supplier with a ‘PEFC Controlled Sources’ claim. This fibre supply represents less than 5% of Lavington’s total fibre supply.

The Lavington pellet mill procures all of their feedstock from secondary sources in the supply base. Secondary feedstock is sourced through their PEFC Due Diligence system (“DDS”) from a variety of sawmill suppliers. Sawmills source high-quality logs from the forest and mill them into solid wood products such as structural lumber. Lavington procures the sawdust and shavings generated by these suppliers.

Additional detail of the Lavington pellet mill supply base is provided in the Lavington pellet mill Supply Base Report (SBR), which can be found on Pinnacle’s website at the following address: [www.pinnaclepellet.com](http://www.pinnaclepellet.com).



## 5.3 Detailed description of Supply Base

The Supply Base Area is described as the entire Province of British Columbia which is 55 million hectares of forestland. 83% of BC's forests are coniferous leading, 6% are mixed forests containing both coniferous and deciduous species, and 6% are deciduous leading. A small portion of secondary fibre received at Lavington originates from the United States bordering southern British Columbia, Oregon, Washington, Idaho and Montana

The total annual volume of primary feedstock is 0% of the total.

The total annual volume of secondary feedstock procured by Lavington is approximately 233,743 oven dried tonnes. Approximately 83% of the secondary feedstock is certified to a SBP-approved CoC Scheme.

The total annual volume of tertiary feedstock is 0% of the total.

A quantitative description of the Supply Base can be found in the Supply Base Report.

## 5.4 Chain of Custody system

Pinnacle has a management system, including documented procedures that determine feedstock compliance to the SBP Standards. Pinnacle is utilizing their PEFC certified Chain of Custody system to track SBP-compliant feedstock and SBP-controlled feedstock. During the assessment, PwC found some feedstock to be misclassified (NC-03). The procedures have been updated subsequent to the audit to correctly classify the feedstock. All wood fibre is tracked from the source through the mill to the customer.

Pinnacle uses a database to gather and control information related to the feedstock such as supplier name, scale tickets, fibre type, certification, and district of origin. Pinnacle has appropriate control mechanisms to calculate output volumes, claims and trademark/logo approval. Additionally, Pinnacle conducts an annual internal audit and management review of the commitments, programs and procedures to evaluate the overall effectiveness of the SBP management system.

## 6 Evaluation process

### 6.1 Timing of evaluation activities

<b>Evaluation Activity</b>	<b>Date / Location</b>	<b>Persons Involved</b>	<b>Approx. Duration</b>
Pre-Assessment / Document Review	November 9-10, 2015. PwC office.	Cheryl Woode, PwC SBP Team Leader Shawn Ellsworth, PwC SBP Team Assessor Joe Aquino, Superintendent of Forest Biomass, Pinnacle Cindy Bunker, Sales/Logistics Coordinator, Pinnacle Nate Ryant, NMR Resources Management Bernard Tobin, GM Fibre Supply, Pinnacle	6 hours
PwC Stakeholder Consultation	December 18, 2015 – January 18, 2015. PwC office.	Bruce Eaket, PwC SBP Lead Auditor Cheryl Woode, PwC SBP Team Leader	2 hours
Initial Assessment	January 11, 2016. On-site at Lavington and surrounding area.	Cheryl Woode, PwC SBP Team Leader Joe Aquino, Superintendent of Forest Biomass, Pinnacle Andrew Meyer, Plant Manager, Pinnacle Krystle Buszco, Assistant Operation Controller Rick Buchanan, Capital Project Accountant Cindy Bunker, Sales/Logistics Coordinator, Pinnacle (Phone) Paul Pawlowski, Director of Energy and Environment, Pinnacle (Phone)	6 hours
	February 3, 2016. On-site at Westview Wood Pellet Port.	Cheryl Woode, PwC SBP Team Leader Joe Aquino, Superintendent of Forest Biomass, Pinnacle Eugene Lupynis, Director of Logistics, Pinnacle Steve Robin, Terminal Manager, Westview.	4 hours
	February 9, 2016. On-site at Fibreco Export Inc.	Cheryl Woode, PwC SBP Team Leader Joe Aquino, Superintendent of Forest Biomass, Pinnacle Eugene Lupynis, Director of Logistics, Pinnacle Ray Louie, Assistant Fibre Manager, Fibreco.	4 hours
Follow-up Assessment	February 8, 2017. Phone interview with Fibreco Export Inc.	Cheryl Woode, PwC SBP Team Leader Shawn Ellsworth, PwC SBP Team Assessor Eugene Lupynis, Director of Logistics, Pinnacle (Phone) Ray Louie, Assistant Fibre Manager, Fibreco. (Phone) Ana Dahlin, ASI Witness Assessor Maris Zudrags, ASI Witness Assessor	1 hour
	February 9-10, 2017. On-site at Lavington and surrounding area.	Cheryl Woode, PwC SBP Team Leader Shawn Ellsworth, PwC SBP Team Assessor Joe Aquino, Superintendent of Forest Biomass, Pinnacle Bernard Tobin, GM Fibre Supply, Pinnacle Dylan LeClerc, Production Supervisor, Pinnacle Daniel Martin, Plant Operator, Pinnacle Cindy Bunker, Sales/Logistics Coordinator, Pinnacle (Phone) Ana Dahlin, ASI Witness Assessor Maris Zudrags, ASI Witness Assessor	12 hours
	March 10, 2017. Phone interview with Westview	Cheryl Woode, PwC SBP Team Leader Erin Trask, Operations Assistant- Westview Terminal (Phone)	30min.

	Terminals, Prince Rupert, BC		
Audit Closure and PwC Certification Decision	May 9-12, 2017 and December 18, 2017 at the PwC office.	James Lucas, Peer Reviewer, PwC SBP Lead Auditor Mike Harris, PwC Certification Decision Maker	4 hours

## 6.2 Description of evaluation activities

PwC completed the initial SBP assessment in six phases, with the most significant phase being the on-site initial and follow-up assessments.

### **Pre-Assessment / Document Review (DRR):**

The purpose of the DRR Assessment was to evaluate if the requirements of the Standards had been met, in particular those requirements that must be documented. In addition, PwC evaluated the Chain of Custody process/management system to ensure that it had been through a complete Plan-Do-Check-Act (PDCA) cycle; including internal audit and management review or that these activities have been scheduled to occur prior to the Initial Assessment. In addition, Pinnacle is certified to the PEFC CoC Standard. Time during this phase of the assessment was focused on reviewing the SBP requirements that are unique from the other standards, such as Greenhouse Gas (GHG) data and collection.

### **PwC Stakeholder Consultation:**

PwC launched our stakeholder consultation on December 18, 2015 – January 18, 2015 prior to the completion of the implementation and follow-up assessments. PwC used the stakeholder list that Pinnacle used in its consultation. Stakeholders were invited via email to comment on the Supply Base Evaluation process. PwC did not receive comments from the stakeholders.

### **Initial Assessment:**

PwC conducted the Initial Assessment on-site at Lavington. Conformance was confirmed through observations, reviewing records and conducting interviews with staff and management. A thorough review of the CoC and SBP processes, GHG data and collection, and fibre input and output were conducted. Critical control points such as the weigh station, quality testing lab, control room, and rail loadout were included in the Assessment. PwC also interviewed a sample of secondary suppliers for verifying the information regarding the fibre provided to Lavington. The discussions and evidence reviewed included fibre supply area and forest certification evidence, if applicable.

Additionally, PwC conducted a site visit to the ports at Westview Wood Pellet Terminal and Fibreco Export Inc.. Pellets produced at Lavington are transported by rail to the port for storage, handling and export to customers. A thorough review of the CoC processes, GHG data and collection, and storage and handling of the pellets at the port was conducted.

### **Follow up Assessment and Supplier Interviews:**

Due to the length of time between the opening meeting of the initial assessment through to the audit completion, a follow-up site visit to Lavington was conducted in February, 2017. The follow up assessment included additional interviews and document review at the pellet mill, suppliers, and port.

**Audit Closure and PwC Certification Decision:**

PwC provided the draft Non-conformities and Opportunities for Improvement to Pinnacle at the closing meeting of both the Initial and Follow-up Assessments. Pinnacle responded with their Root Cause Analysis/action plans for the findings and provided PwC with evidence of finding closure. Once the Lead Auditor accepted the root cause analysis, action plan and evidence the findings were closed. Evidence is stored in the PwC working papers, including the review by a peer Lead Auditor and the PwC Practice Leader who made the final PwC certification decision.

## 6.3 Process for consultation with stakeholders

The SBE was provided to various stakeholders across the Province to engage in stakeholder consultation of Pinnacle's supply base area. Given the geographic spread of Pinnacle's supply base, the strategy used to reach a wide array of stakeholders was to engage existing Public Advisory Groups (PAG) in areas where the biomass producing facilities are located. PAG's consist of members representing the public, government, industry, First Nations, private land, small tenures and other stakeholders interested in forest management topics. Pinnacle's head office is located in Prince George, BC which is centrally located in the supply base area. Given the vicinity and local presence, a Pinnacle representative made an in-person presentation to the Prince George PAG as a means of distributing the SBE and to provide insight on the certification scheme. The SBE was electronically provided to the PAG's and the members were given opportunity to review and comment on the locally applicable verifiers. In total, Pinnacle reached out to five PAG's representing the seven regions where Pinnacle obtains feedstock.

The PAG groups engaged by Pinnacle include:

1. Okanagan PAG – Armstrong and Lavington Supply Area
2. Cariboo PAG – Williams Lake and Quesnel Supply Area
3. Prince George PAG – Meadowbank Supply Area and Head Office
4. Burns Lake PAG – Burns Lake Supply Area
5. Morice PAG – Houston Supply Area

PwC conducted its 30-day stakeholder consultation from December 18, 2015 – January 18, 2016 prior to the completion of the implementation assessment. PwC used the stakeholder list that Pinnacle used in its first consultation and stakeholders were informed of the consultation via email. The list included five PAG's representing the seven regions where Pinnacle obtains feedstock. Each PAG includes members representing the public, government, industry, First Nations, private land, small tenures and other stakeholders interested in forest management topics. Stakeholders were invited to comment on the Supply Base Evaluation process. The results of the stakeholder consultation is described in section 7.5 below.

## 7 Results

### 7.1 Main strengths and weaknesses

The strengths of Pinnacle's SBP programme are: (1) their integration of the SBP requirements with their existing fibre procurement management system which also meets the PEFC DDS requirements, and (2) their commitment to purchase fibre from suppliers that are committed to meeting voluntary forest management and CoC Standards and (3) their purchase of fibre from a Supply Base Area and (4) their staff of registered professional foresters who have a strong knowledge of the B.C. forestry industry practices as well as a good working relationship with their suppliers.

PwC noted several Non-conformities which are discussed in section 10 of this report.

PwC has determined that Pinnacle has the organizational capability to systematically meet the performance objectives and the requirements of SBP Standards 2, 4 and 5.

### 7.2 Rigour of Supply Base Evaluation

Not Applicable

### 7.3 Compilation of data on Greenhouse Gas emissions

During the initial and follow-up assessments PwC:

- Confirmed the Greenhouse Gas (GHG) sources for feedstock input from the forest, production at the facility, transportation to the port and storage and handling at the port;
- Reviewed how the fibre input/output data was measured, calculated and reported;
- Conducted interviews with pellet mill and port personnel on the overview of the operations, historical operations, changes to operations, procedures and processes used to maintain the facility, and procedures and processes used to ensure data quality;
- Where appropriate, we obtained a sample of records to support the evidence provided in these interviews;
- Reviewed GHG collection and reporting procedures, records, and controls

PwC concluded that Lavington has the competency to analyse and report the required data on Greenhouse Gas emissions.

### 7.4 Competency of involved personnel

Pinnacle's fibre procurement team are registered professional foresters with local forestry experience and knowledge of ecological and social values, applicable laws and regulations, business management practices, operation of suppliers, associated with the supply base.

Pinnacle assigned management with appropriate skills and competency to implement and execute the management and control systems relating to SBP compliance. Management interviewed during the assessment were found to be knowledgeable of the SBP requirements and Pinnacle's management system.

## 7.5 Stakeholder feedback

As discussed in Section 6.3 of this Public Summary report, Pinnacle received one comment by an individual from the Morice PAG to provide clarity on the SBE and the SBP certification scheme. Pinnacle scheduled an in-person presentation at the next PAG meeting held in June 2016. PwC did not receive feedback as a result of our stakeholder consultation processes.

## 7.6 Preconditions

PwC issued preconditions to Pinnacle during this main evaluation. As discussed in Section 10 of this Public Summary the non-conformities had to be closed before the PwC Practice Leader could make a certification decision.

## 8 Review of Biomass Producer's Risk Assessments

Not Applicable.

## 9 Review of Biomass Producer's mitigation measures

A Supply Base Evaluation is not included in the scope of the evaluation.



## 10 Non-conformities and observations

All nonconformities (minor and major) were closed before completing the reporting process.

Pinnacle provided a root cause analysis for each nonconformity indicating the cause of the system or process failure and provided sufficient evidence to PwC indicating how the nonconformity has been corrected.

The details of the Non-conformities raised during the two evaluations are provided in the tables below:

- **Nonconformities**

PwC Reference Number	SBP Requirement	Finding Details	Status
IA-NC-01-MAJOR nonconformity	SBP Standard 5 (V1.0) @ 5.1 requires that all data submissions been supported by appropriate evidence for enabling energy and carbon balance calculations.	<p>Pinnacle uses a spreadsheet to report the energy and carbon balance on an annual basis. PwC reviewed the spreadsheet for completeness and accuracy. At the time of the on-site audit, it was found that the following data categories were not on the Armstrong spreadsheet; therefore, the BP is not reporting on all SBP data categories.</p> <p>4.3 average moisture content at the exit of the dryer</p> <p>4.4 average moisture content of wood biomass produced</p> <p>4.7 total annual amount of propane used for production</p> <p>5.1 Transport</p> <p>5.2 Wood Biomass storage, handling and trans-shipment</p> <p>Pinnacle was given 60 days from February 2, 2016 to resolve the issue and has subsequently provided PwC with an acceptable action plan and evidence of implementation. PwC has reviewed the updated GHG spreadsheet and verified that all the required data for standard 5A exists.</p>	CLOSED
IA-NC-02-MAJOR nonconformity	SBP Standard 5 (V1.0) @ 8.2 requires that the SBR meets the requirements for this report as set out in SBP Standard #2 @ 7.3	<p>The Supply Base Reports was written using a dated template version (version 1 February 2016) but there is a more recent version available on the SBP website Version 1.2 - June 2016. The new version has additional requirements (e.g. Section 2.1 requires an overview of the proportions of SBP feedstock product groups (Controlled Feedstock, SBP-compliant Primary Feedstock, SBP-compliant Secondary Feedstock, SBP-compliant Tertiary Feedstock, SBP non-compliant Feedstock).</p> <p>In addition, the data used in the report is more than one year old and is therefore considered dated where it is from January 1, 2015 to December 31, 2015.</p> <p>Pinnacle was given 60 days from March 3, 2017 to resolve the issue and has subsequently provided PwC with an acceptable action plan and evidence of</p>	CLOSED

		implementation. PwC has reviewed the updated SBR for each facility and verified that the update was made to Version 1.2 - June 2016.	
IA-NC-03-MAJOR nonconformity	SBP Standard 2 (V1.0) @ 5.1 requires that the BP defines the Supply Base (SB) for all feedstock received which is used in the production of SBP-compliant biomass.	<p>During a supplier interview it was found that the supplier does receive some raw fibre sources from outside the Supply Base Area of B.C. and that the secondary feedstock they provide to Lavington would likely have some fibre from areas outside the defined supply base, such as the Pacific North-west of the US and Alberta.</p> <p>Pinnacle was given 60 days from April 10, 2017 to resolve the issue and has subsequently provided PwC with an acceptable action plan and evidence of implementation. PwC has reviewed the claim statement and verified that Pinnacle has procedures in place to categorize feedstock with PEFC-controlled sources claims as SBP controlled.</p>	CLOSED
IA-NC-04-MAJOR nonconformity	SBP Standard 4 (V1.0) @ 1.2 requires that the BP has an SBP Trademark Licence Agreement.	<p>During the assessment, it was found that Pinnacle uses the SBP trademarks on their website, "Sustainable Biomass Partnership" without a valid SBP Trademark License Agreement.</p> <p>Pinnacle was given 60 days from March 3, 2017 to resolve the issue and has subsequently provided PwC with an acceptable action plan and evidence of implementation. PwC reviewed the license agreement and verified that both parties have signed it.</p>	CLOSED
IA-NC-05-MAJOR nonconformity	SBP Standard 5 (V1.0) @ 6.4 requires that the organization follow the mechanism for recording data in the SBP database of GHG and profiling data as defined in the SBP Instruction Document 5A: Collection and Communication of Data.	<p>During the assessment, it was found that Pinnacle had inaccurate data in the GHG spreadsheets for Lavington, Houston, Burns Lake and Meadowbank.</p> <p>Pinnacle was given 60 days from March 3, 2017 to resolve the issue and has subsequently provided PwC with an acceptable action plan and evidence of implementation. PwC has reviewed the data in the GHG spreadsheets and verified the missing data has been included.</p>	CLOSED
IA-NC-06-MAJOR nonconformity	SBP Instruction Document 5A (V1.1) @ 2.1.5, SBP Instruction Document 5B (V1.1) @ 2.1.3 requires that the Legal Owners shall make data available using the templates specified in these Instruction Document and SBP Instruction Document 5C (V1.1) @ 2.1.3 requires that the BP shall make	<p>Pinnacle has not made data available using the Audit Report on Energy and GHG data (SAR), Audit Report on Energy and GHG data for Supplied Biomass (SREG) templates or the Static Biomass Profiling Data.</p> <p>Pinnacle was given 60 days from March 3, 2017 to resolve the issue and has subsequently provided PwC with an acceptable action plan and evidence of implementation. PwC has reviewed each SAR for completeness.</p>	CLOSED

	data specified in this Instruction Document available in an appropriate form and format to customers and End-Users of Biomass supplied by the Legal Owner		
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- **Opportunities for Improvement**

No new opportunities for improvement were identified during the initial and follow-up assessments.

## 11 Certification decision

PwC has concluded that Lavington has the organizational capability to systematically meet the performance objectives and the requirements of the Standards based on the evaluation process described in Section 6 of this Public Summary. PwC's Practice Leader recommends certification of Pinnacle Lavington as of December 18, 2017.