



Sustainable Biomass Program

SCS Global Services Evaluation of Enviva Pellets Southampton, LLC Compliance with the SBP Framework: Public Summary Report

Scope Change Audit

www.sbp-cert.org



Completed in accordance with the CB Public Summary Report Template Version 1.4

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

Document history

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1 Overview

CB Name and contact: SCS Global Services, 2000 Powell St, STE 600, Emeryville CA 94608

Primary contact for SBP: Sarah Harris sharris@scsglobalservices.com (510) 452 8012

Current report completion date: 28/Jan/2019

Report authors: Sebastian Haefele & Theodore Brauer

Name of the Company: Enviva Pellets Southampton, LLC, 26570 Rose Valley Rd. Franklin, VA 23851

Company contact for SBP: Don Grant, don.grant@envivabiomass.com, (984) 789-3642 ext 1069

Certified Supply Base: Mid-Atlantic (North Carolina, South Carolina, Virginia)

SBP Certificate Code: SBP-04-11

Date of certificate issue: 20/Oct/2017

Date of certificate expiry: 21/Nov/2021

This report relates to the Scope Change Audit

2 Scope of the evaluation and SBP certificate

This certificate covers the production of wood pellets, for use in energy production, at Enviva Pellets Southampton and transport to the Port of Chesapeake for storage, aggregation, vessel loading and shipping. It also covers a Supply Base Evaluation for the sourcing of feedstock from North Carolina, South Carolina and Virginia. The scope includes communication of Dynamic Batch Sustainability Data.

3 Specific objective

The object of this expansion of scope audit was to confirm:

- The Biomass Producer's management system is implemented across the entire scope of certification (SBP ST 4, & 5).
- Implementation of Dynamic Batch Sustainability Data communication as per Instruction Document 5D.
- Organization conforms with the requirements at critical control points; including supplier documentation with feedstock properties (trip/ scale tickets) and incoming loads database, material accounting records, credit ledgers for tracking of volumes, feedstock types and claims, spreadsheets with total volume of pellets produced, staff awareness assessed through interviews.
- Collection assessment information
- Generating assessment findings

4 SBP Standards utilised

4.1 SBP Standards utilised

Please select all SBP Standards used during this evaluation. All Standards can be accessed and downloaded from <https://sbp-cert.org/documents/standards-documents/standards>

- SBP Framework Standard 1: Feedstock Compliance Standard (Version 1.0, 26 March 2015)
- SBP Framework Standard 2: Verification of SBP-compliant Feedstock (Version 1.0, 26 March 2015)
- SBP Framework Standard 4: Chain of Custody (Version 1.0, 26 March 2015)
- SBP Framework Standard 5: Collection and Communication of Data (Version 1.0, 26 March 2015)

4.2 SBP-endorsed Regional Risk Assessment

Not applicable: No SBP endorsed Regional Risk Assessment for supply area.

5 Description of Company, Supply Base and Forest Management

5.1 Description of Company

Enviva Holdings, LP (“Enviva”) Southampton is under the umbrella of Enviva Holdings LP, which encompasses eight pellet mills in south eastern and eastern United States. Enviva produces approximately 2.3 million metric tons of wood pellets annually. Pellets are primarily delivered to power plants in the United Kingdom and Europe.

The Enviva Pellets Northampton pellet mill is located in Franklin, Virginia. It produced approximately 483,109 metric tonnes of pellets since July 2016. The production capacity of the pellet mill is 515,000 metric tonnes of pellets per year. Pellets are transported by truck to the Port of Chesapeake for export to European utilities.

5.2 Description of Company’s Supply Base

Enviva LP operates 3 mills in its Mid-Atlantic region: Enviva Pellets Southampton, in Franklin, VA, Enviva Pellets Northampton in Garysburg, NC and Enviva Pellets Ahoskie in Ahoskie, NC. Each mill has an average catchment area of 120 km, which overlap. As such, Enviva treats the supply regions for each mill as one large supply area, with the potential for each mill to obtain fiber from any portion of the area. This Mid-Atlantic regional supply base includes portions of the states of Virginia and North Carolina.

The land ownership patterns in the Mid-Atlantic are typical for the southern United States: approximately ninety-three percent of the timberland is privately held (approximately 5 million hectares). In North Carolina, about 60% of the private landownership is non-industrial; and in Virginia 66% is also non-industrial. An estimated 54% of the Mid-Atlantic region is forested, 22% is in agriculture, 10% is developed and 8% is wetlands. These four categories comprise 94% of the land cover.

Ahoskie procures all of their feedstock from primary and secondary sources in the mid-Atlantic supply base area. Their internal fiber procurement group is responsible for the implementing the voluntary standards including the Sustainable Forestry Initiative® (SFI) Fiber Sourcing and Chain of Custody (CoC) Standards, the Programme for the Endorsement of Forest Certification (PEFC™) CoC Standards, the Forest Stewardship Council™ (FSC) CoC and Controlled Wood Standards and the SBP Standards. Feedstock is sourced primarily direct from the forest in the form of roundwood or wood chips from primary suppliers, all of whom are vetted and qualified prior to delivering. Fiber cannot be delivered to the mill until a contract is signed with the supplier. The contract requires suppliers to use trained loggers during harvest, follow Best Management Practices (BMP’s) for water quality, and to avoid controversial sources of fiber, such as illegal logging, wood harvested in violation of traditional and civil rights, wood harvested in forests where high conservation values are threatened by management activities, wood harvest in forests being converted to plantations or non-forest use, and wood from forests in which genetically modified trees are planted. Enviva foresters confirm trained logger status and ensures that loggers delivering fiber maintain their continuing education as required. Enviva uses forest residues, such as tree tops, limbs, deformed trees and any other wood produced during harvested that is otherwise unacceptable to other wood users in the area. Enviva

does not use sawlogs in the production of pellets, nor does the plant use any construction debris, treated wood, or post-consumer material.

Enviva also sources secondary feedstock from a variety of sawmill and wood industry suppliers. Sawmills source high-quality logs from the forest and mill them into products like two-by-fours. Wood industry suppliers use the products created by sawmills to produce products such as furniture or other assembled wood products. These feedstocks are most commonly in the form of sawdust or shavings and may be green or kiln-dried.

Additional detail is provided in Enviva Pellets Mid-Atlantic Supply Base Report (SBR), which can be found on their website at the following address: <http://www.envivabiomass.com/sustainability/wood-sourcing/sustainable-biomass-partnership>.

5.3 Detailed description of Supply Base

At the Southampton plant, the pellet feedstocks have the following characteristics:

- Primary Feedstock (roundwood and forest residues direct from the forest) comprise 98.9% of the feedstock, all are SBP-compliant Primary Feedstock and 34.4% of the volume is from certified sources.
- Secondary Feedstock (sawmill and wood industry residues) are 1.1% of the feedstock supplied by 22+/- mills, are a combination of SBP-Controlled Secondary Feedstock and SBP-Compliant Secondary Feedstock and none is from certified sources.
- Hardwoods make up 89.3% of the feedstock and softwood species are the remaining 10.7%.

Enviva's three mid-Atlantic mills received feedstocks from the following sources, by volume:

- 12.0% was made up of residues supplied by sawmills and wood industries.
- 57.3% was made up of hardwood and pine chips and roundwood from mixed oak-pine forests. These forests are managed for the production of pine sawtimber at low-intensities and contain a mixture of hardwood and pine trees. These forests are either planted in pine or naturally seeded from adjacent stands or seed trees, and little to no fertilizers or herbicides are applied to them throughout their life cycle. This establishes an overstory of straight, large-diameter pine trees with an understory of crooked, small-diameter hardwood trees that cannot be made into solid wood products.
- 25.2% was made up of hardwood and pine chips and roundwood from southern yellow pine forests. These are forests that were planted in pine and either managed moderately with minimal effort to prevent hardwood trees from growing in the understory, or more intensively to suppress significant understory growth, thereby increasing the forest's growth rate and yield. These forests are generally thinned 1-2 times throughout their growth cycle, meaning that certain trees are removed to reduce density in the forest and create additional room for the remaining trees to grow to sawtimber size and quality. These thinned trees are sold to low-grade consumers like Enviva.
- 4.6% was made up of hardwood and pine chips and roundwood from upland hardwood forests. These are low-intensity managed hardwood forests that are naturally seeded with an overstory of large-diameter oak, poplar, and hickory hardwood trees and a significant understory of small-diameter maple, oak, and sweetgum hardwood trees.
- 1.0% was made up of hardwood and pine chips and roundwood from bottomland hardwood forests. These are very low-intensity managed hardwood forests that are located in lowland areas and floodplains along rivers or other water bodies and which have soils that are saturated or flooded for at least part of the year. These forests contain overstories of large-diameter oak, gum, and cypress trees that originate from seedlings and sprouts arising out of stumps from previously harvested trees and a significant understory of small-diameter hardwood trees. When the landowner decides to harvest, the

forest is clearcut and the stems of the large-diameter hardwood trees are sold to hardwood sawmills or furniture manufacturers, while the small diameter understory hardwood trees and tops and branches of sawtimber trees are sent to lower grade consumers like Enviva.

5.4 Chain of Custody system

Enviva Pellets Southampton is a member of Enviva LP's PEFC multisite certificate, which it uses to track SBP compliant feedstock. Its management system and documented procedures are fully capable of determining feedstock compliance. All wood fiber is tracked from the district of origin through the mill and finally to the final bill of sale.

Enviva 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. Enviva has appropriate control mechanisms to calculate output volumes, claims and trademark/logo approval. Additionally, Enviva conducts an annual 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

Audit Activity	Items to Review / Actions	Date & time (EST)
Opening meeting	Introductions, auditor review of audit scope, audit plan and intro/update to SBP and SCS standards and protocols, client description of organization	January 25, 2019 11 am
Review of ST 5 ID-5D: procedures, staff interviews, material balances and records. DTS. For all seven mills	Auditor-selected sample of the following: material tracking system, summary of purchases and sales, invoices, shipping documents, training records, and records, tracebacks from certified outputs to eligible inputs. Interviews with appropriate number and diversity of staff to assess knowledge of CoC procedures related to their position.	11:20
Break		2:00 pm
Cont'd Review of ST 5 ID-5D.	idem	2:20-5:30
End of day 1		
Closing meeting preparation	Auditors take time to consolidate notes and review audit findings for presentation at closing meeting	January 28, 2019 3:45pm
Closing meeting and review of findings	Convene with all relevant staff to summarize audit findings, review identified nonconformities, and discuss next steps	4:00-4:30
End of audit		

Participants:

- Kim Cesafsky – Enviva
- Shawn Cook – Enviva
- Theodore Brauer – SCS Global Services
- Sebastian Hafele – SCS Global Services

6.2 Description of evaluation activities

The remote expansion of scope audit was conducted to include instruction document 5D.

Audit methods consisted of review of documentation, studies, assessments, surveys, websites, and staff interviews.

6.3 Process for consultation with stakeholders

N/A – expansion of scope audit.

7 Results

7.1 Main strengths and weaknesses

The rigor of the Greenhouse Gas data collection and communication are a strength for Enviva Ahoskie, Northampton, and Southampton. The information is detailed and laid out in an easily understood manner. Additionally, the transparency of the Track and Trace program is impressive.

For weaknesses, please review the Surveillance audit update section where new nonconformities are listed.

7.2 Rigour of Supply Base Evaluation

N/A – expansion of scope to ID-5D

7.3 Collection and Communication of Data

Enviva Pellets Ahoskie, Northampton, and Southampton have a sophisticated excel database where all Greenhouse Gas data is compiled. All compilation is conducted by the Sustainability Analytical team, from the Enviva Holdings main office in Bethesda. The data for each pellet mill is kept under the Enviva umbrella separate from the other pellet mills. For Enviva Pellets Ahoskie, Enviva Pellets Northampton, and Enviva Pellets Southampton, most energy use is invoiced by the month and requires no adjustment to match the reporting period.

7.4 Competency of involved personnel

The SBE was completed by Enviva's in-house fiber procurement group who has local forestry experience and knowledge of ecological and social values associated with the supply base, applicable laws and regulations, business management practices, operation of suppliers, and the local forest resource. Enviva 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.

7.5 Stakeholder feedback

N/A – expansion of scope to ID-5D

7.6 Preconditions

No pre-conditions.

8 Review of Company’s Risk Assessments

Describe how the Certification Body assessed risk for the Indicators. Summarise the CB’s final risk ratings in Table 1, together with the Company’s final risk ratings. Default for each indicator is ‘Low’, click on the rating to change. Note: this summary should show the risk ratings before AND after the SVP has been performed and after any mitigation measures have been implemented.

The initial risk assessment determined that six indicators were specified risk and all remaining indicators are low risk for all areas from which the BP procures biomass. The risk ratings were determined by reviewing the SBE along with supporting evidence such as the company policy requires, COC procedures, PEFC Due Diligence Risk Assessment, supplier agreements and verification through field visits to the forest. There are no sub-scopes. Upon implementation of management actions the BP concludes low risk for all indicators, and the audit focussed on mitigation measures for each.

To conclude low risk for formerly “specified risk”, Enviva implemented a corrective action to lower the risk and is still implementing the corrective action which brings their procedures up to standard. SCS’ review during the audit of the actions listed below agree that these measures are implemented, thus SCS agrees with Enviva’s rating of low risk for the aforementioned indicators.

In addition, Enviva has incorporated several changes in its forest-level DDS (its Track & Trace Program) since the 2016 certification evaluation, all designed to enhance the efficacy of “Ongoing” and “Post” harvest internal audits that form a key element of their compliance/assurance process. Examples of changes that have been incorporated since 2016 are:

- Requirement that harvests maps are submitted to the relevant Enviva Commodity Manager by the supplier for every harvest area from which Enviva is acquiring fiber
- More standardized use of the USF&WS Wetlands Mapper software as part of the evaluation of all harvest tracts
- Stronger bottomland protections (supplier requirements)
- Annual targets for number of Ongoing- and Post-harvest audits to be conducted by each Enviva forester
- Formalization of Level 1 and Level 2 triggers for more intensive examination of harvest tracts
- Ongoing enhancements of the Enviva Information System (EIS).

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

Indicator	Risk rating (Low or Specified)	
	Producer	CB
1.1.1	Low	Low
1.1.2	Low	Low

Indicator	Risk rating (Low or Specified)	
	Producer	CB
2.3.3	Low	Low
2.4.1	Specified	Specified

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	Specified	Specified
2.1.2	Specified	Specified
2.1.3	Specified	Specified
2.2.1	Low	Low
2.2.2	Low	Low
2.2.3	Specified	Specified
2.2.4	Specified	Specified
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

2.4.2	Low	Low
2.4.3	Low	Low
2.5.1	Low	Low
2.5.2	Low	Low
2.6.1	Low	Low
2.7.1	Low	Low
2.7.2	Low	Low
2.7.3	Low	Low
2.7.4	Low	Low
2.7.5	Low	Low
2.8.1	Low	Low
2.9.1	Low	Low
2.9.2	Low	Low
2.10.1	Low	Low

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

Indicator	Risk rating (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

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

2.2.1	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

2.7.5	Low	Low
2.8.1	Low	Low
2.9.1	Low	Low
2.9.2	Low	Low
2.10.1	Low	Low

9 Review of Company’s mitigation measures

Each criterion was evaluated and measured against Enviva’s existing forest certification and chain of custody programs and the listed LAV’s. Information from the FSC US CWNRA was used as a baseline to determine if areas of high conservation value, biodiversity and conversion exist in Enviva’s supply base area. Additionally, Enviva asked the US Endowment for Forestry and Communities to assess the supply base area for at risk forest types. Based on this work and local knowledge Enviva determined a rating of "low risk" for each indicator with the exception of 2.1.1, 2.1.2, 2.1.3, 2.2.3, 2.2.4 and 2.4.1.

Indicator	Risk Assessment	Management system
2.1.1 The BP has implemented appropriate control systems and procedures for verifying that forests and other areas with high conservation value in the Supply Base are identified and mapped.	The US does not have an SBP approved regional risk assessment that fully considers all of the indicators.	Enviva is using the FSC US CWNRA as the baseline for determining potential areas of high conservation value. Additional work with interested and engaged stakeholders (see Section 6) has been incorporated into the supply base evaluation to supplement Enviva’s ability to accurately map areas of high conservation value
2.1.2 The BP 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.	Related to 2.1.1 If areas of high conservation value cannot be adequately identified the management systems or mitigation measures cannot be implemented to reduce risk.	Related to 2.1.1 Enviva’s use of the FSC US CWNRA and stakeholder engagement has adequately identified areas of high conservation value. Enviva has robust management systems that can address these areas of specified risk and manage the outcome to low risk
2.1.3 The BP 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.	Related to 2.1.1 Areas of conversion to production plantation (as defined by SBP) is low in Enviva’s supply base area. Conversion to non-forest after January 2008 may occur in the supply base area	Related to 2.1.1 Enviva’s use of the FSC US CWNRA and local knowledge provide Enviva the ability identified areas of conversion after January 2008 Enviva has robust management systems that can address these areas of specified risk and manage the outcome to low risk
2.2.3 The BP has implemented appropriate control systems and procedures to ensure that key ecosystems and habitats are	Related to 2.1.1 Identification of key ecosystems and habitats is necessary to begin the process of identifying if they are properly conserved or set aside	Related to 2.1.1 Enviva’s use of the FSC US CWNRA and stakeholder engagement has adequately identified areas of key ecosystems and habitats.

<p>conserved or set aside in their natural state (CPET S8b).</p>		<p>Additionally, Enviva’s Forest Conservation Fund provides grant monies to successful applicant to help them set aside or conserve forests containing high conservation values, key ecosystems and habitats. Further, Enviva’s ongoing engagement with interested stakeholders has extended our reach into additional areas of conservation (See section 6). Enviva has robust management systems that can address these areas of specified risk and manage the outcome to low risk.</p>
<p>2.2.4 The BP has implemented appropriate control systems and procedures to ensure that biodiversity is protected (CPET S5b).</p>	<p>Related to 2.1.1 Identification of areas with biodiversity concerns is necessary to begin the process of identifying if they are properly protected</p>	<p>Related to 2.1.1 Enviva’s use of the FSC US CWNRA and stakeholder engagement has adequately identified areas of key ecosystems and habitats. Additionally, Enviva’s Forest Conservation Fund provides grant monies to successful applicant to help them set aside or conserve forests containing high conservation values, key ecosystems and habitats. Further, Enviva’s ongoing engagement with interested stakeholders has extended our reach into additional areas of conservation (See section 6). Enviva has robust management systems that can address these areas of specified risk and manage the outcome to low risk.</p>
<p>2.4.1 The BP 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).</p>	<p>Related to 2.1.1 Identification of forest ecosystems that provide key services is necessary to ensure proper control systems are employed to ensure forest health, vitality and other services are maintained</p>	<p>Related to 2.1.1 Enviva’s use of the FSC US CWNRA and stakeholder engagement has adequately identified key forest ecosystems. Additionally, Enviva’s Forest Conservation Fund provides grant monies to successful applicant to help them set aside or conserve forests containing high conservation values, key ecosystems and habitats. Further, Enviva’s ongoing engagement with</p>

		<p>interested stakeholders has extended our reach into additional areas of conservation (See section 6) Enviva has robust management systems that can address these areas of specified risk and manage the outcome to low risk.</p>
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10 Non-conformities and observations

Identify all non-conformities and observations raised/closed during the evaluation (a tabular format below may be used here). Please use as many copies of the table as needed. For each, give details to include at least the following:

- *applicable requirement(s)*
- *grading of the non-conformity (major or minor) or observation with supporting rationale*
- *timeframe for resolution of the non-conformity*
- *a statement as to whether the non-conformity is likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks.*

11 Certification decision

Based on the auditor's recommendation and the Certification Body's quality review, the following certification decision is taken:	
Certification decision:	Certification approved
Certification decision by (name of the person):	Ciara McCarthy
Date of decision:	12/Feb/2019
Other comments:	<i>Click or tap here to enter text.</i>