



Sustainable Biomass Program

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

Second Surveillance 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

Current report completion date: 23/Apr/2018

Report authors: Kyle Meister

Name of the Company: Enviva Pellets Cottondale LLC

Company contact for SBP: Don Grant, don.grant@envivabiomass.com

Certified Supply Base: Primary and secondary feedstock for the Cottondale regional supply base includes Florida, Alabama, Georgia, Mississippi, South Carolina, and Tennessee.

SBP Certificate Code: SBP-04-04

Date of certificate issue: 06/Feb/2017

Date of certificate expiry: 05/Feb/2022

This report relates to the Second Surveillance 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 Cottondale and transport to the Panama City Port Authority for storage, aggregation, vessel loading, and shipping. It also covers a Supply Base Evaluation for sourcing feedstock from US states of Florida, Alabama, Georgia, Mississippi, South Carolina, and Tennessee.

The scope of this surveillance audit included a review of procedures, documentation, records and databases to ensure the organization's management system is appropriate to ensuring conformance to SBP Standards 1, 2, 4, and 5. Other audit methods used were field audits, site walkthrough of pellet mill and port and interviews with relevant staff and supplier representatives. The evaluation included a review of documentation such as the supply base report including the risk assessment, PEFC DDS, supplier contracts, SAR and SBPD, among others.

3 Specific objective

The specific objective of this surveillance audit was to confirm that the Biomass Producer's management system is capable of ensuring that all requirements of SBP Standards 1: Feedstock Compliance Standard, 2: Verification of SBP-compliant Feedstock, 4: Chain of Custody, and 5: Collection and Communication of Data (including Instruction Documents 5A: Collection and Communication of Data, 5B: Energy of GHG Data, 5C: Static Biomass Profiling Data) are implemented across the entire scope of certification. This was achieved by review of risk assessments, harvest, GHG and other data, observation of harvest sites, and interviews with key personnel and stakeholders

The following critical control points were identified and evaluated:

*Feedstock procurement: All wood delivered to the mill is tracked in a centralized system. Prior to delivery of round wood to the scale house, the tract and owner name, district of origin (Lat/Long), product type, etc. are obtained from the supplier.

*Storage and processing: Roundwood is processed into wood pellets by being chipped, dried, hammered, and extruded into pellets and the bark is used as boiler fuel. In-woods chips are dried, hammered, and extruded into pellets. Sawmill residual is hammered and pelletized. The conversion factors used to allocate the Roundwood, thinning, in-wood chips and secondary residuals into pellets are reasonable.

*Volume Accounting: The procedures detail the process to properly maintain the volume credit spreadsheet, with provisions for subtracting certified product sold and for carrying only the past 12 months of credits.

*Outgoing transactions: Invoices are issued, and all outgoing transactions of SBP-certified biomass are recorded in the DTS

*Energy data collection and reporting: The organization developed and maintains databases to record data values and calculate energy data as required by Standard 5 and keeps records that substantiate the data.

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

There is no approved RRA in North America.

5 Description of Company, Supply Base and Forest Management

5.1 Description of Company

Enviva Holdings, LP (“Enviva”) owns and operates six plants in the United States. In January 2015 Enviva acquired the Cottondale facility. The Cottondale facility first began production in April 2008 as Green Circle Bioenergy, Inc. Cottondale produces over 700,000 metric tons of pellets per year and employs 90 people, including technicians, engineers, and operators. The majority of feedstock is sourced as roundwood with additional woodchips (both wet and dry) also being purchased. Bark from the roundwood is used as energy in the dryer. Additional bark is purchased to fully power the dryer.

5.2 Description of Company's Supply Base

Enviva Holdings LP ("Enviva") operates the Enviva Pellets Cottondale mill located in northwest Florida, USA. The supply base area for this facility includes counties from all or part of Alabama, Florida, Georgia, Mississippi, South Carolina, and Tennessee in the Southeast United States of America. Forest is the predominate land use in the supply area (67%) and include the following World Wildlife Fund (WWF) ecoregions; Appalachian Mixed Mesophytic Forests, Appalachian-Blue Ridge Forests, Central U.S. Hardwood Forests, Florida Sand Pine Scrub, Middle Atlantic Coastal Forest, Southeastern Conifer Forests, Southeastern Mixed Forests (WWF, 2018). The forest in the supply base consists primarily of southern yellow pine and mixed hardwood species. Forest species composition for each state within the supply base is described in Table 3 of the SBR (US Department of Agriculture Forest Service, 2014). Enviva provides a market for low grade wood produced during harvests of higher-value timber. Removals of both pine and hardwood for pellet production in the Southern region comprised only 2.7% of total harvest volume in 2017. Primary harvesting activity and wood consumption in the South is driven by saw-timber markets, with total removals for the pellet industry comprising only 0.1% of the total pine inventory and 0.08% of the total hardwood inventory. In 2017, pine pulpwood removals for the entire pellet industry accounted for 3.8% of total pine pulpwood removals for all wood product classifications (Table 4 of SBR). The primary feedstock is monitored through the Track & Trace monitoring program. During 2017, Enviva Cottondale received feedstocks from the following sources, by volume: 36% was made up of residues supplied by sawmills and wood industries; 26% 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; 31% 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; 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; and 2% was made up of hardwood and pine roundwood from bottomland hardwood forests. These are hardwood forests in lowland areas and floodplains containing mostly large-diameter oak, gum, and cypress sawtimber trees with smaller, crooked hardwood trees growing underneath. When the forest is harvested, the stems of sawtimber trees are sold to sawmills that make higher-grade solid wood products like furniture. The tops and branches of sawtimber trees and the crooked hardwood trees from below cannot be made into solid wood products but need to be removed from the site so the next generation of the forest can begin growing. These harvest byproducts are sold to consumer of lower-grade wood like Enviva.

5.3 Detailed description of Supply Base

The catchment area for Cottondale contains 33.6 million hectares of forested land. The annual growth to drain ratio of the supply base is 1.57:1 for all species, 1.86:1 for hardwood, and 1.50:1 for pine (US Department of Agriculture Forest Service, 2018). A positive growth to drain ratio indicates that forest growth exceeds harvest removals. In the Gulf region of the U.S. South, total pine inventory has increased by an average of 2.3% annually between 2000 and 2017 (Table 1 of SBR). Since 2000, US Forest Service Forest Inventory Analysis (FIA) data indicates an increase in forest area in the states covered included in the Cottondale supply base area (US Department of Agriculture Forest Service, 2018) (Table 2 of SBR). A quantitative description of the Supply Base can be found in Enviva Cottondale's Supply Base Report (SBR).

5.4 Chain of Custody system

Enviva has implemented documented Chain of Custody (COC) procedures to determine feedstock compliance to SBP requirements. The organization uses its PEFC and SFI COC certificates as the base for its SBP control system. All wood, both primary and secondary feedstock, is tracked from the district of origin, through the pellet mill, and to the port. Feedstock is brought in via trucks to the mill. The feedstock is segregated by type; woodchips/ sawdust, roundwood, and bark (used in the dryer). After pelletizing the material is loaded onto a train and transported to the Panama City Port Authority to be loaded onto a ship. Although the legal point of sale is at the loading of the ship, GHG information is gathered until point of delivery to the customer. Enviva uses a database to gather and control information related to feedstock such as supplier name, logger, scale tickets, fibre type, certification, and district of origin. This database can appropriately track output volumes. Trademark/logo use is controlled from the Enviva Head Office and will not be used by Enviva Cottondale.

6 Evaluation process

6.1 Timing of evaluation activities

On 5 April 2018, an opening meeting was held so that document review could be start prior to the onsite audit and so that GHG data could be presented and assessed. The onsite audit took place 16-20 April 2018 and included inspection and observation of the pellet mill, loading facilities, transport, and port. Field inspection was also conducted for a sample of harvest sites included in the supply base evaluation for non-FSC and non-PEFC certified sources on April 17-18. GHG information was also verified onsite through additional record review and observation of GHG data collection points.

6.2 Description of evaluation activities

The onsite Surveillance Audit was conducted over the course of 4.5 days and included an audit of the Supply Base Evaluation, Documented Management System, Collection and Communication of Greenhouse Gas data, site tour, and procurement sites. Audit methods consisted of review of documentation, studies, assessments, surveys, websites, and staff interviews. The site tour and visits were evaluated by review of documentation, monitoring results, field observations, and interviews. Most time was spent on the Supply Base Evaluation. Equal time was spent on the Documented Management System and Greenhouse Gases.

6.3 Process for consultation with stakeholders

Enviva has several activities for stakeholder consultation, including through its “Contact Us” form on the website, media inquiries, and investor information since it is a publicly traded company.

7 Results

7.1 Main strengths and weaknesses

The main strengths of the Enviva Cottondale include an effective greenhouse gas record keeping system. The employees involved in the SBP program at Enviva Cottondale are very knowledgeable and understand their duties and how they relate to SBP. Enviva also maintains an effective tracking program for all suppliers of primary and secondary feedstock. The weaknesses are described in section 10.

7.2 Rigour of Supply Base Evaluation

Enviva has developed a detailed SBE including a clear description of their Supply Base Area. The geographical scope of the SBE are the counties in Florida, Alabama, and Georgia for primary feedstock and counties in Alabama, Florida, Georgia, Mississippi, South Carolina, and Tennessee in USA for secondary feedstock to ensure that fiber is not received from outside the SBE scope area. The SBE was developed internally by qualified personnel using credible third-party data sources and was peer reviewed. Their existing management and monitoring systems implemented to meet other voluntary standards and designed to ensure compliance with applicable laws and regulations. Risk was designated low for all core indicators. SCS Global Services conducted a review of the SBE process and concluded that the control systems in place meet the SBP standard requirements during the surveillance audit. However, the SBE lacks some details on Enviva's control systems and procedures currently in place.

7.3 Collection and Communication of Data

Enviva Pellets Cottondale has a sophisticated excel database where all Greenhouse Gas data is compiled. All compilation is conducted by one individual at Enviva who keeps the data for each pellet mill under the Enviva umbrella separate from the other pellet mills. For Enviva Pellets Cottondale, most energy use is invoiced by the month and requires no adjustment to match the reporting period, however, electricity is billed approximately 10 days offset from the reporting period and a conversion factor is applied.

7.4 Competency of involved personnel

The SBE was completed by Enviva's inhouse 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's management and control systems for SBP are the same as those used to meet the SFI/PEFC CoC, which have been in place since 2012. Key personnel tasked with implementing and maintaining the management and control systems relating to SBP compliance are well trained and competent. 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

Additional stakeholder outreach activities conducted by SCS in 2017 yielded one comment. No stakeholder comments were received as a part of SCS' outreach activities in 2018.

7.6 Preconditions

NA – no preconditions issued in 2018.

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 all 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, Chain of Custody Procedures, FSC Controlled Wood / PEFC Due Diligence Risk Assessment, fiber supply agreements and verification through field visits to the forest. There are no sub-scopes.

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
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

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

2.2.8	Low	Low
2.2.9	Low	Low
2.3.1	Low	Low
2.3.2	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
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 Company's mitigation measures

NA – no mitigation measures required.

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.*

NC number 1	NC Grading: Observation
Standard & Requirement:	SBP Framework Standard 1: Feedstock Compliance V1.0, IN-1A, 4.3
Description of Non-conformance and Related Evidence:	
No representatives of indigenous peoples are represented on the BP's stakeholder list.	
Timeline for Conformance:	Other Response is optional.
Evidence Provided by Company to close NC:	<i>Click or tap here to enter description provided by Company to close the NC.</i>
Findings for Evaluation of Evidence:	<i>Click or tap here to enter findings for evaluation of evidence by the auditor.</i>
NC Status:	Open

NC number 2	NC Grading: Major
Standard & Requirement:	SBP Framework Standard 1: Feedstock Compliance V1.0, IN-1A, 6.1
Description of Non-conformance and Related Evidence:	
No multilateral environmental agreements or ILO Conventions are listed in the annexes to the Standard.	
Timeline for Conformance:	3 months from the report finalisation
Evidence Provided by Company to close NC:	ENV-SBP-03 was updated with the list of multilateral environmental agreements and ILO Conventions on page 56, Instruction Note 1A.
Findings for Evaluation of Evidence:	CAR is closed.
NC Status:	Closed

NC number 3	NC Grading: Minor
Standard & Requirement:	SBP Framework Standard 1: Feedstock Compliance V1.0, 1.3.1
Description of Non-conformance and Related Evidence:	
BP does not cite supplier agreements (contracts) that it uses to require legal compliance. While contracts contain language to that require compliance to laws and that ownership rights to timber are secure, the SBE does not cite Timber Harvest Notifications required in Georgia and Alabama. These may serve as a backstop to protect legal property rights, including the rights to manage and harvest timber.	

Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	<i>Click or tap here to enter description provided by Company to close the NC.</i>
Findings for Evaluation of Evidence:	<i>Click or tap here to enter findings for evaluation of evidence by the auditor.</i>
NC Status:	Open

NC number 4	NC Grading: Minor
Standard & Requirement:	SBP Framework Standard 1: Feedstock Compliance V1.0, 2.1.1
Description of Non-conformance and Related Evidence:	
SBE cites several references and risk assessments. It has concluded low risk for most ecoregions that contain HCVs within the supply base citing credible sources. However, for the Florida Sand Pine Scrub Ecoregion and the Central U.S. Hardwood Forest, BP has not made a specific conclusion of risk of its activities to these ecoregions. Moreover, land use conversion is identified as a threat to these, but the BP has not concluded if its activities present any risk.	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	<i>Click or tap here to enter description provided by Company to close the NC.</i>
Findings for Evaluation of Evidence:	<i>Click or tap here to enter findings for evaluation of evidence by the auditor.</i>
NC Status:	Open

NC number 5	NC Grading: Observation
Standard & Requirement:	SBP Framework Standard 1: Feedstock Compliance V1.0, 2.1.2
Description of Non-conformance and Related Evidence:	
<i>Click or tap here to enter NC description.</i> BP has supplier agreements in place with primary and secondary suppliers and has properly cited these as components of its control system. For secondary suppliers, BP uses a Residual Supplier Reporting Form. The SBE states that “An example of the reporting sheet is in Appendix I.” However, there is no Appendix I to the SBE. Furthermore, this Residual Supplier Reporting Form may contain proprietary or confidential information.	
Timeline for Conformance:	Other

	Response is optional.
Evidence Provided by Company to close NC:	<i>Click or tap here to enter description provided by Company to close the NC.</i>
Findings for Evaluation of Evidence:	<i>Click or tap here to enter findings for evaluation of evidence by the auditor.</i>
NC Status:	Open

NC number 6	NC Grading: Minor
Standard & Requirement:	SBP Framework Standard 1: Feedstock Compliance V1.0, 2.2.2, 2.2.4, and 2.2.7
Description of Non-conformance and Related Evidence:	
<p>In addition to BMP compliance reports cited elsewhere in this standard for stumpage sales (i.e., BP’s direct purchases of standing timber), the BP requires adherence to laws and BMPs in its supplier agreements. As a participant in SFI, the BP supports SFI’s logger training programs, which include the use of BMPs. However, the SBE does not include the supplier agreements, timber sale inspection forms, and its Track & Trace system as evidence of the control systems that the BP has in place. There are other indicators for which the BP does not cite any or some of these contractual elements of its control system, including: 2.2.4 for biodiversity protection (supplier agreements); 2.2.7 for air quality (supplier agreements); 2.4.1 for ecosystem services (supplier agreements); 2.4.2 for natural processes, including fire and pathogens (supplier agreement, Track & Trace system); and 2.4.3 for unauthorized/illegal activities (supplier agreements, sourcing programs, Track & Trace system (including harvest set-up and chain of custody controls (e.g., gate cards, scales)). Supplier agreements contain language for legal compliance, management practices, BMPs, forestry practices, and sustainability compliance that serve as controls for soil and water protection, biodiversity, air quality, fire, and pathogens.</p>	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	<i>Click or tap here to enter description provided by Company to close the NC.</i>
Findings for Evaluation of Evidence:	<i>Click or tap here to enter findings for evaluation of evidence by the auditor.</i>
NC Status:	Open

NC number 7	NC Grading: Minor
Standard & Requirement:	SBP Framework Standard 1: Feedstock Compliance V1.0, 2.6.1.
Description of Non-conformance and Related Evidence:	
<p>BP cites studies and risk assessments, but not its own control systems and procedures implemented to address grievances and disputes described in indicator 2.6.1, such as its supplier agreements and HR</p>	

<p>system (e.g., processes and procedures). The BP's employee handbook describes the rights each worker enjoys, including the right of free association. However, the employee handbook does not mention collective bargaining as is stated in the SBE. This right is not mentioned on any of the Federal or State postings in the pellet mill facilities either. BP does not cite its supplier agreements, which require legal compliance and are an important component of the control system. BP's HR practices ensure the company is an equal opportunity employer and prohibit discrimination in all the federal and state laws in its areas of operation. However, it does not cite its supplier agreements, which require legal compliance, as a component of its control system. BP cites risk assessments, laws, and other sources, but not its own control systems and procedures in its finding. For example, its contracts with suppliers require legal compliance, which cover OH&S laws. Related performance records for the pellet facility, such as training, incidents/accidents, etc. are also not cited or explained.</p>	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	<i>Click or tap here to enter description provided by Company to close the NC.</i>
Findings for Evaluation of Evidence:	<i>Click or tap here to enter findings for evaluation of evidence by the auditor.</i>
NC Status:	Open

NC number 8	NC Grading: Observation
Standard & Requirement:	SBP Framework Standard 1: Feedstock Compliance V1.0, 2.6.1.
Description of Non-conformance and Related Evidence:	
<p>In the past, BP has sourced biomass from Florida State Parks as part of a longleaf pine (<i>Pinus palustris</i>) restoration project. While this is part of the BP's landscape-level conservation objectives and is consistent with the BP's SBE, its current SBE states that it sources from private FMUs only. Public FMUs, which may include federal, state, county or municipal forests, often have management systems that meet SBP Standard 1 requirements with little, if any, modification or additional control measures. US Department of Defense (DOD) and Department of Energy (DOE) FMUs are managed in a similar manner, though public access and input may be restricted due to classified activities/areas. For example, Federal and State foresters use field assessment and state natural heritage data to identify potential HCVs (e.g., species and communities with protected status) and create management measures to maintain or enhance conditions for these HCVs. During interviews with BP staff, the BP would like to pursue more opportunities to source biomass from public and DOD/DOE FMUs. The BP should ensure that the SBE is updated to include such FMUs before these are sourced again.</p>	
Timeline for Conformance:	Other Response is optional
Evidence Provided by Company to close NC:	<i>Click or tap here to enter description provided by Company to close the NC.</i>
Findings for Evaluation of Evidence:	<i>Click or tap here to enter findings for evaluation of evidence by the auditor.</i>

NC Status:	Open
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NC number 9	NC Grading: Observation
Standard & Requirement:	SBP Framework Standard 4: Chain of Custody V1.0, 5.4.1
Description of Non-conformance and Related Evidence:	
<p>SBP-specific COC procedures, section 5.4.1 state that the information in Standard 4, indicator 5.4.1 will be supplied to buyers. For sales external to all Enviva companies, sales information is recorded on invoices and DTS. However, for internal sales/transactions (i.e., transfer of SBP-compliant biomass from one Enviva-held certificate to another), an SBP interpretation allows for such information to only be recorded on DTS (rather than on invoices). The BP issued some internal invoices for such transactions and staff interviewed were unsure of what steps to follow in cases of internal sales. The BP should consider updating its SBP COC procedures to be consistent with SBP interpretations for Standard 4, 5.4.1 a-d.</p>	
Timeline for Conformance:	Other Response is optional.
Evidence Provided by Company to close NC:	<i>Click or tap here to enter description provided by Company to close the NC.</i>
Findings for Evaluation of Evidence:	<i>Click or tap here to enter findings for evaluation of evidence by the auditor.</i>
NC Status:	Open

NC number 10	NC Grading: Observation
Standard & Requirement:	SBP Framework Standard 5: Collection and Communication of Data, V1.0, ID 5B, 5.5.3
Description of Non-conformance and Related Evidence:	
<p>There is one meter at the Port of Panama City, Florida for the BP's port-based laboratory. The contractor interviewed reports meter readings to be billed to the BP, but it is not clear if the reading is used for calculations.</p>	
Timeline for Conformance:	Other Response is optional
Evidence Provided by Company to close NC:	BP contacted the contractor and discovered that it has been receiving the meter readings. It updated its SAR and associated spreadsheets for summarizing data and making calculations.
Findings for Evaluation of Evidence:	OBS addressed.
NC Status:	Closed

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):	Sebastian Häfele
Date of decision:	27/Sep/2018
Other comments:	<i>Click or tap here to enter text.</i>