

SCS Global Services Evaluation of Shaw Resources Belledune Compliance with the SBP Framework: Public Summary Report

Second Surveillance Audit

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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*

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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:	09/Feb/2018
Report authors:	Ellen Kincaid and Tucker Watts
Name of the Company: Pellet Facility	Shaw Resources (A Division of The Shaw Group Limited) Belledune Wood
Company contact for SBP:	Julie Griffiths, Environmental Specialist
Certified Supply Base:	South-eastern Québec (QC), New Brunswick (NB) and on occasion from Nova Scotia (NS).
SBP Certificate Code:	SBP-04-15
Date of certificate issue:	15/Nov/2017
Date of certificate expiry:	14/Nov/2022

This report relates to the Second Surveillance Audit

2 Scope of the evaluation and SBP certificate

Surveillance audit to assess the CH's conformance to SBP standards 1, 2, 4, and 5 and respective Instruction Notes and Documents. The evaluation included on-site visits to the pellet mill, port facilities and harvest sites as well as interviews with respective staff and supplier representatives and review of documentation and records.

This certificate covers the production of wood pellets, for use in energy production, at Shaw Resources Belledune and transportation to the Port of Belledune. It also covers a Supply Base Evaluation for the sourcing of feedstock from south-eastern Québec (QC), New Brunswick (NB) and Nova Scotia (NS).

3 Specific objective

The specific objective of this surveillance 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.

The following critical control points were identified and audited:

Feedstock procurement

Receiving of feedstock

Accounting of volumes

Storage and production

Documentation of transactions

Collection and reporting of energy and greenhouse gas 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

Not applicable

5 Description of Company, Supply Base and Forest Management

5.1 Description of Company

Shaw Resources operates two wood pellet manufacturing plants in Belledune, NB and Milford, NS with a corporate/central office in Milford, NS. The second plant in Milford, NS (Eastern Embers) was also assessed to the SBP Framework by SCS during the time period, and it will be the subject of a separate SBP certificate and related documents. Shaw Resources holds a multi-site certification to the Programme for the Endorsement of Forest Certification (PEFC) Chain of Custody (CoC) Standard and much of the information in the Supply Base Reports (SBRs) are consistent between the two plants, but the Supply Base Areas (SBAs) are slightly different. Furthermore, the Belledune plant is also assessed on SBP Framework Standard 1: Feedstock Compliance Standard, which includes an SBE.

The subject of this certificate, the Belledune, NB plant (Belledune), procures feedstock from both primary and secondary sources in south-eastern Quebec (QC), New Brunswick (NB), and Nova Scotia (NS), and trucks their finished pellets to the Port of Belledune, NB.

Shaw Resources purchases all feedstock within the scope of their PEFC CoC and Due Diligence management system, however, some primary feedstock is sourced from forests without a Sustainable Forest Management (SFM) certification and some secondary feedstock is sourced from production facilities without a CoC certification, therefore, a Supply Base Evaluation (SBE) and the associated Risk Assessments have been completed because Shaw Resources Belledune intends on using the “SBP Compliant” claim.

5.2 Description of Company’s Supply Base

Shaw Resources Belledune supply base covers three provinces in Canada; Nova Scotia, New Brunswick, and South-eastern Quebec. Shaw Resources procures primary feedstock from roundwood and secondary feedstock sawmill residues.

Any primary fibre procured directly from the forest is only from managed forest lands (Crown and private woodlots) in New Brunswick and are purchased from Crown licensees or regional marketing boards. Secondary fibre (sawmill residuals) such as chips, sawdust and shavings are supplied mostly through local New Brunswick sawmills, but some sawmill residuals are sourced from south eastern Quebec and on occasion from Nova Scotia, Canada.

Each of the 3 provinces where fiber is procured, have provincial acts and legislation which aid in the protection of the region’s forests, land titles and use, and also to ensure the scaling and transportation of logs and wood fibre is documented.

Forest management plans are required on Crown lands and highly encouraged on all private lands. Silviculture program funding and guidance are available to private woodlot owners to assist with forest management.

Additional detail is provided in Shaw Resources Belledune Supply Base Report (SBR), which can be found on their website at the following address: <https://shawresources.ca/about-shaw/why-shaw/>

5.3 Detailed description of Supply Base

Shaw Resources Belledune manufactures industrial wood pellets for export to European power utilities. The supply base is considered southeastern Québec (QC), New Brunswick (NB) and Nova Scotia (NS). Sawmill residuals (Sawdust, shavings, woodchips and bark) and round wood are the main sources of feedstock for the Belledune Wood Pellet Plant.

New Brunswick Supply Base

The New Brunswick provincial government proclaimed the Crown Lands and Forests Act in 1982, and this is the legal foundation of Crown forest management in New Brunswick. The Act divides NB's Crown land into 10 timber licences; each license is leased through a 25-year forest management agreement to a large forest-based company called a Licensee. On a 5-year cycle, the New Brunswick Department of Natural Resources assesses how the licensee has managed the Crown forest during the previous five years, and if satisfactory, will renew the agreement for another 5-year period. Each licensee must produce a forest management plan that covers a 25-year period and must be sustainable over an 80-year planning horizon. Annual operating plans are also required of licensees and are monitored by the government to ensure that each licensee is following the regulations and standards. All forest operations on Crown land must be ISO 14001 certified and certified under an independent sustainable Forest Management System (i.e. CSA, FSC, SFI), making NB the first jurisdiction in the world to require certification of licensee operations.

The provincial government sets the annual allowable cut (AAC) for both Crown and private woodlots based on on-going research on forest inventory. New Brunswick has one of the best forest inventory programs in Canada. Data obtained from aerial photography analysis and ground sample plots chart the province's timber growth and yield and are updated on an annual cycle using a computerized geographical information system.

Although more stringent regulations exist for Crown Land, private lands are not exempt from provincial and federal regulations & legislation. Private woodlots in New Brunswick are monitored through 1 of 7 regional marketing boards. The marketing boards provide forest management assistance to private woodlot owners such as calculating timber inventory, harvesting layout, management plan development and programs that encourage the improved management of woodlots. Private woodlot owners operating under regional marketing boards can also obtain annual subsidies for silviculture programs.

South-eastern Québec Supply Base

In 2012, the province of Québec adopted the Sustainable Forest Development Act. The newly formed timber marketing boards distribute supply guarantees. The system allows the volumes of wood not used by the guarantee holder to be made available to other mills. In addition, guarantee holders must pay annual fees and dues on every cubic meter of timber purchased (rates are based on the price obtained at auctions of timber from the public forests). About 25% of the timber from the public forest is allocated via a public auction.

The Minister of Natural Resources and Wildlife (MRN) is responsible for planning, monitoring and controlling forest management, scaling the wood and allocating the rights of crown forest in Québec. About 85% of all productive Crown forest in Québec is certified, either through SFI, CSA or FSC. The annual allowable cuts are determined by the Chief Forester.

Private woodlots contribute about 20% of wood supplies in Québec. Although more stringent regulations exist for Crown Land, private lands are not exempt from provincial and federal regulations & legislation. The Federation of Forest Producers of Québec (Fédération des producteurs forestiers du Québec, FPFQ) is the provincial organization that promotes the interests of the 130,000 private woodlot owners, which includes 35,000 forest producers. There are 13 regional syndicates that were formed to help with the protection and enhancement of Québec's private forests and for the orderly marketing of timber from these areas. The MRN offers technical & financial support to assist privately owned woodlots with sustainable management; however, only certified private woodlots have access to government programs. In Québec, private forests are considered to be agricultural product and are governed by the Act Respecting the Marketing of Agricultural, Food, and Fish Products along with the Sustainable Forest Development Act. Municipalities have bylaws to restrict/regulate cutting of trees to limit the size of cut blocks and to protect riparian zones and sensitive environments. Permits for logging on private lands are required in all municipalities. The Civil Code of Québec provides recourse for logging performed on private property without the consent of the landowner.

Nova Scotia Supply Base

Nova Scotia's Code of Forest Practice is a guideline for sustainable forest management which are mandatory on Crown lands (administered by NSDNR), and encouraged on private woodlots in Nova Scotia. A large part of the code is implemented through various provincial and federal legislation and regulations. The Forests Act and the Crown Lands Act is enforced by the Nova Scotia Department of Natural Resources (NSDNR).

The majority of primary wood products supplied to industry in Nova Scotia are from privately owned woodlots. Although more stringent regulations exist for Crown Land, private lands are not exempt from provincial and federal regulations & legislation. The provincial government implements and develops forest management programs to encourage and assist private woodlot owners to manage their land more effectively. This is done by providing training programs and financial incentives such as the Sustainable Forestry Fund to encourage the sustainable use of private woodlots. Registered buyers of primary forest products are required to contribute to a silviculture program in the Sustainable Forest Fund based on a rate per volume basis. The Nova Scotia Registry of Buyers is a registry where businesses and individuals register to acquire primary forest products for processing. The registry provides reliable data to help understand the demand and estimate sustainable harvest levels, as well as aiding in the long-term management of Nova Scotia forests. The Registry of Buyer's annual report outlines the volumes of wood harvested throughout the province.

The Nova Scotia Forests Act was implemented to develop a healthy productive forest capable of yielding high volumes of high quality product. The enforcement division of NSDNR completes regular visits to areas being harvested on both Crown and private lands to ensure that both the Forests Act and the Crown Lands Act are being followed. The provincial government is currently implementing an increased level of silviculture programs to ensure the continued sustainability of forestlands in Nova Scotia.

Primary feedstock consists of mostly spruce, pine, fir species from small forest landowners (42%) and large forest landowners (58%). Secondary feedstock comes from residual chips or sawdust produced at sawmills and shavings from planer mills. All secondary feedstock is a combination of softwood and hardwood.

Please see the Biomass Producer's Supply Base Report for further information.

5.4 Chain of Custody system

Shaw Resources Belledune has implemented the requirements of the PEFC CoC Standard. A database is used to gather and control feedstock information such as supplier name, scale tickets, fiber type, certification, and district of origin. Shaw Resources Belledune has appropriate control mechanisms to calculate output volumes, claims and trademark/logo approval. Additionally, Shaw Resources Belledune conducts an annual management review of the commitments, programs and procedures to evaluate the overall effectiveness of the SBP management system.

Shaw Resources Belledune has completed a Supply Base Evaluation (SBE). The SBE determined that all wood fiber in the supply base area met the definitions, criterion and indicators in SBP Standards 1 & 2 and are considered "low risk".

Shaw Resources Belledune has a management system and documented procedures that are fully capable of determining feedstock compliance. All wood fiber (primary and secondary) is tracked through the process from the district of origin through production to the final bill of sale. Finished pellets are trucked from Shaw Resources Belledune to the Port of Belledune where they are stored and then loaded onto vessels. No co-mingling of pellets occurs at the port or on the vessel.

6 Evaluation process

6.1 Timing of evaluation activities

The second surveillance evaluation was carried out January 15 – 17, 2018. The site first to the pellet mill occurred on January 15 and included a walkthrough of the entire facility following all critical point from feedstock delivery, production, storage, and shipping and GHG data collection. The visit of the Port of Belledune occurred January 16 and included a review of CoC processes, GHG data collection, and storage and handling of the pellets. Field visits for the Supply Base Evaluation were also conducted January 16.

6.2 Description of evaluation activities

The on-site audit included an audit of the Supply Base Evaluation, documented management system, collection and communication of energy data, and the chain of custody system. Also included were a 2-day site tour and visits to procurement sites to evaluate the BP's management and monitoring system. Audit methods consisted of review of documentation, studies, assessments, surveys, websites, emails, databases and staff interviews. The site tour and visits were evaluated by review of documentation, monitoring results, observations, and interviews. One day was spent conducting field evaluations. One day was spent on the Supply Base Evaluation, Documented Management System, Greenhouse Gases, and Chain of Custody. Critical control points were witnessed in all areas.

6.3 Process for consultation with stakeholders

No stakeholder consultation has been conducted for this surveillance audit.

7 Results

7.1 Main strengths and weaknesses

The strength of Shaw Resources SBP program is their integration of the SBP requirements with their existing fiber sourcing management system and procedures designed to meet the requirements of applicable laws and regulations in the supply base and the requirements of PEFC CoC Standard. Shaw Resources staff have demonstrated a strong knowledge of the forestry industry practices, have a good awareness of the suppliers operating in the region and have limited the number of suppliers from which they purchase fiber.

Shaw Resources has the organizational capability to systematically meet the performance objectives and the requirements of the SBP Standards based on the elements of the SBP Standards that were tested. Weaknesses were identified as nonconformities and reported in section 10

7.2 Rigour of Supply Base Evaluation

Shaw Resources has developed a detailed SBE including a clear description of their supply base. The SBE was developed internally by qualified personnel using credible third party data sources and their existing management and monitoring systems implemented to meet other voluntary standards and designed to ensure compliance with applicable laws and regulations.

The SBE was completed by Shaw Resources Environmental Management System Representative, the same individual responsible for the maintaining the PEFC Chain of Custody management system. The SBE process involved a detailed review of all feedstock sources within the Supply Base Area for the Belledune facility which included New Brunswick, Nova Scotia and Quebec. Shaw Resources consulted with the New Brunswick Department of Natural Resources, the North Shore Forestry Marketing Board, and the Forest Sector from the Department of Environment in Quebec to evaluate the ecological and social values, applicable laws and regulations, business management practices, operation of suppliers, and the local forest resource in the supply base.

Furthermore, the SBE was peer reviewed by a qualified Registered Professional Forester. Nate Ryant, RPF, has many years of experience in auditing forestry certification programs across Canada and risk assessments for chain of custody systems. Nate Ryant is a consultant based out of British Columbia whom has experience assisting clients with the acquisition of forest management certifications and is the recommended consultant of the Wood Pellets Association of Canada (WPAC). Nate reviewed provincial government research and publications and was in contact with the local forest marketing board and the Maritime SFI Implementation Committee to assist him in gaining familiarity with local forestry practices.

SCS has reviewed the SBE process and conclude that it meets the SBP standard requirements

7.3 Collection and Communication of Data

The BP is fully committed to collecting and reporting all greenhouse gas emissions data deemed necessary by its customer and regulators. The company uses proprietary software to collect and communicate the data

and records the data in SBP Audit Report on Energy and GHG data (SAR), SBP Audit report on Energy and GHG Data for Supplied Biomass (SREG) and SBP Static Biomass Profiling Data sheet (BPD). At the audit, there were non-conformities issued to SBP Standard 5 and associated Instruction Documents (see section 10)

7.4 Competency of involved personnel

Shaw Recourses engaged Nate Ryant, RPF, an external forestry expert to assist with the Supply Base Evaluation. SCS found the individual assigned to perform the SBE to have 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. Shaw Resources 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

No stakeholder comments have been received.

7.6 Preconditions

No preconditions to continued certification identified.

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 management system that Shaw Resources has developed to meet the requirements of these standards includes the monitoring of forest operations, and as part of this evaluation, SCS has audited this aspect of the BP's operation. SCS assessed risk for the Indicators by reviewing the means of verification the BP developed, interviews with relevant staff, and conducting on-site field audits of forest suppliers

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

Not applicable

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: Minor
Standard & Requirement:	ID 5B, 5.5.1
Description of Non-conformance and Related Evidence:	
Percentage electricity from network not added to SAR.	
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:	Revised SAR was submitted with corrections made.
Findings for Evaluation of Evidence:	All findings addressed appropriately.
NC Status:	Closed

NC number 2	NC Grading: Major
Standard & Requirement:	ID 5B, 4.1.3; ID 5B, 5.4.1
Description of Non-conformance and Related Evidence:	
The total amount of total pellets made as stated in the SAR includes the amount of material purchased for fuel. A feedstock classification is written for fuel that is purchased for the dryer and is not intended to be used for pellets. Additionally, the energy use of fuel in MJ/ metric tonne pellet needs to be added.	

Timeline for Conformance:	3 months from the report finalisation
Evidence Provided by Company to close NC:	Updated SAR
Findings for Evaluation of Evidence:	All findings addressed appropriately.
NC Status:	Closed

NC number 3	NC Grading: Observation
Standard & Requirement:	ID 5A, 2.2.1
Description of Non-conformance and Related Evidence:	
Although legal ownership of the Pellets ends at the port prior to boarding the ships, the BP has filled out the Sea Transport section.	
Timeline for Conformance:	Other Response is optional
Evidence Provided by Company to close NC:	Updated SAR
Findings for Evaluation of Evidence:	All findings addressed appropriately.
NC Status:	Closed

NC number 4	NC Grading: Observation
Standard & Requirement:	ID 5B, 4.1.1
Description of Non-conformance and Related Evidence:	
Title of Feedstock #s are the same for the first two feedstock categories. They are both numbered Feedstock #3. These #s were chosen from an old version of Instruction Document 5A, which is not part of the current version of Instruction Document 5A. The use of the same name for the Feedstock may lead to confusion.	
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 5	NC Grading: Observation
Standard & Requirement:	ID 5B, 4.1.2
Description of Non-conformance and Related Evidence:	
<p>The feedstock #05 and Feedstock #06 have a maximum distance that is more than 1.5x greater than the weighted average for more than 10% of material. Feedstock #06 has a weighted average distance of 123km. 184.5km is 1.5x that weighted averaged distance. .96% material comes from more than 1.5x 184.5 km away. This is less than the suggested amount to put in a justification in the SAR. Feedstock #05 has a weighted average distance of 95km. 142.5km is 1.5x that weighted averaged distance. 9.7% of material comes from more than 1.5x 142.k km away. This is right on the edge of the suggested amount to put in a justification in the SAR. To stop confusion on the amount of material that comes from further than 1.5x the weighted average, the CH could consider putting a justification in the SAR.</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 6	NC Grading: Minor
Standard & Requirement:	ID 5C, 3.1.3
Description of Non-conformance and Related Evidence:	
<p>The SBP Static Biomass Profiling Data sheet has not been formally approved by SBP before being supplied to customers and end-users.</p>	
Timeline for Conformance:	<i>Choose NC timeline.</i>

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: Major
Standard & Requirement:	SBP Framework Standard 1: Feedstock Compliance v1.0, Instruction Note 1A, Section 6.1
Description of Non-conformance and Related Evidence:	
The BP has identified, but not included as annexes to the Standard: a) A list of the national and local forest laws and administrative requirements, which apply to the country or region in which the Standard applies; b) A list of multilateral environmental agreements and ILO Conventions that the country has ratified, relevant to the Standard; and c) A list of, or reference to official lists of, endangered species in the country or region in which the Standard is to be used.	
Timeline for Conformance:	3 months from the report finalisation
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: Minor
Standard & Requirement:	SBP Framework Standard 1: Feedstock Compliance v1.0, criterion 2.3.3
Description of Non-conformance and Related Evidence:	
Analysis has not been completed to show that feedstock harvesting and biomass production positively contribute to the local economy, including employment.	
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 9	NC Grading: Observation
Standard & Requirement:	SBP Framework Standard 2: Verification of SBP-Compliant Feedstock v1.0, Section 20.2
Description of Non-conformance and Related Evidence:	
Requirement to inform SBP of any substantiated complaints within 30 days of the completion of the BP's analysis of the complaint is not stated in procedure. No complaints were received.	
Timeline for Conformance:	Other Response is optional
Evidence Provided by Company to close NC:	Environmental Management System Manual - 6.7 Complaints updated to include requirement to inform SBP of any substantiated complaints within 30 days of the completion of the BP's analysis of the complaint
Findings for Evaluation of Evidence:	All findings addressed appropriately.
NC Status:	Closed

NC number 10	NC Grading: Minor
Standard & Requirement:	SBP Framework Standard 2: Verification of SBP-Compliant Feedstock v1.0, Section 9.1
Description of Non-conformance and Related Evidence:	
The findings, Means of Verification and/or evidence cited in the Supply Based Evaluation do not include information in sufficient detail for primary and secondary suppliers. Insufficient evidence has been stated that monitoring of control systems and procedures are in place to ensure compliance	
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:	

Findings for Evaluation of Evidence:	
NC Status:	Open

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:	11/Jul/2018
Other comments:	<i>Click or tap here to enter text.</i>