

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

Third 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](http://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: 14/May/2019

Report authors: Shannon Wilks

Name of the Company: Enviva Pellets Cottondale, LLC.

Company contact for SBP: Don Grant

Certified Supply Base: Primary and Secondary Feedstock sourced from all/part of counties in Alabama, Florida, Georgia, Mississippi, South Carolina and Tennessee in the southeast United States of America.

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 Third Surveillance Audit

## 2 Scope of the evaluation and SBP certificate

This certificate covers the production of wood pellets using primary and secondary feedstock, for use in energy production, at Enviva Pellets Cottdale 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 includes communication of Dynamic Batch Sustainability Data.

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 and SAR, 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) and Instruction Document 5D: Dynamic Batch Sustainability Data are implemented across the entire scope of certification. This was achieved by review of risk assessments, procedures, 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, in-woods chips, saw dust or shavings to the scale house, the 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

Not Applicable

## 5 Description of Company, Supply Base and Forest Management

### 5.1 Description of Company

Enviva Holdings, LP (“Enviva”) owns and operates seven plants in the south eastern 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 approximately 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), saw dust and shavings 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 (World Wildlife Fund, 2018). The forest in the supply base consists primarily of southern yellow pine and mixed oak cover types. Forest species composition for each state within the supply base is described in Table 1 of Supply Base Report (USDA Forest Service, 2018). Enviva is just one of several industries and entities sourcing wood in its supply base area. 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.

The catchment area for Cottondale contains 33.8 million hectares of forested land. The annual growth to drain ratio of the supply base is 1.61:1 for all species, 1.83:1 for hardwood, and 1.55:1 for pine (USDA 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 inventory has increased by an average of 1.2% annually between 2000 and 2017<sup>1</sup>. 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 (USDA Forest Service, 2018). A quantitative description of the Supply Base can be found in [Enviva Cottondale’s Supply Base Report](#) (SBR).

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<sup>1</sup> The most recently available (as of 2/25/2019) FIA data for 6 states: AL, FL, GA, MS, SC, TN was used in this analysis. For a detailed explanation of our methods, please visit our Forest Trend Map Data Sources & Methods page on our website: <http://www.envivabiomass.com/sustainability/track-and-trace/data-methods/>

## 5.3 Detailed description of Supply Base

Primary feedstock is sourced direct from the forest in the form of roundwood or wood chips from suppliers, all of whom are vetted and qualified prior to delivering. All suppliers must sign a contract with Enviva before wood can be delivered to an Enviva mill. The contract requires suppliers to use trained loggers during harvest, to follow best management practices for water quality, and to avoid controversial sources of wood supply, such as illegal logging. Enviva foresters confirm trained logger status and ensure that loggers delivering wood maintain their continuing education as required. All suppliers and loggers must also adhere to posted safety requirements while on Enviva property. Primary feedstock from forest residues, such as tree tops, limbs, deformed and low-grade trees, and any other wood produced during harvest that is otherwise unacceptable to other wood users in the area is delivered to an Enviva mill as woodchips. A single load of roundwood from the same harvest can contain tops, limbs, and/or small diameter or malformed understory trees that cannot be distinguished from one another through visual inspection. Enviva does not use sawlogs in the production of pellets, nor do we 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 such as dimension lumber. 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.

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

- 36% was made up of residues supplied by sawmills and wood industries.
- 17% 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.
- 43% 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.
- 3% 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% 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 by-products are sold to consumer of lower-grade wood like Enviva.

## 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 COC certificate covered by Enviva's group certificate, NSF-PEFC-COC-C0246258, 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 2019, an opening meeting was held so that document review could start prior to the onsite audit and so that GHG data could be presented and assessed. The onsite audit took place April 28-May 1, 2019 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 29. Standard 5 information was also verified onsite through additional record review and observation of energy data collection points.

### 6.2 Description of evaluation activities

The onsite Surveillance Audit was conducted over the course of 2.5 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. Significant 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

Stakeholder Consultation by the CB: SCS relies on its Master Stakeholder List, which contains stakeholders that are identified by type, e.g. ENGO, Government/regulatory, Educational/Academic, Industry, Indigenous/Aboriginal/Tribal, etc... This list is categorized by country and state/province at the very least, and for this consultation was filtered to omit any stakeholders that were not geographically relevant to the certificate-holder/applicant's supply base.

SHC by the BP: 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.

#### 2018 Update

In early 2018, Enviva reached out to the Florida chapter of The Nature Conservancy (TNC) to get their technical advice on the appropriateness of our sourcing of microchips from scrubby upland hardwood stands, particularly when landowners or land managers intended to replace the offsite HW stands and restore pine stands. TNC concurred that microchipping is an appropriate restoration tool and even took Enviva to a stand at one of their preserves near Cottondale where they wanted microchipping conducted to remove scrubby HW as part of their longleaf restoration. TNC's feedback was consistent with the prior use of microchipping as part of longleaf restoration at Falling Waters and Torreya State Parks. To get a wider range of stakeholders aware of the pine savanna restoration potential of microchipping, Enviva held a workshop on June 22<sup>nd</sup>, 2018, and had 33 attendees from including suppliers, conservation organizations, landowner representatives, state and federal agencies, and others

In 2018 Enviva partnered with a supplier and the Geneva State Forest Wildlife Management Area located in Covington County, Alabama to use forestry management techniques to improve 880 acres of densely planted pines to improve Gopher Tortoise habitat.

The same supplier also used forest management techniques to convert 370 acres of off-site pine and low value hardwood on Eglin Air Force Base in Okaloosa County, Florida as part of a Longleaf Pine restoration project. Enviva published a blog entry on this collaboration on longleaf around Cottondale here:

[http://www .envivabiomass.com/voices-of-enviva/collaboration-key-to-expanding-longleaf-restoration-in-the-florida-panhandle](http://www.envivabiomass.com/voices-of-enviva/collaboration-key-to-expanding-longleaf-restoration-in-the-florida-panhandle)

## 7 Results

### 7.1 Main strengths and weaknesses

The main strengths of the Enviva Cottondale include an effective Standard 5 data and record keeping system. The Sustainability and Procurement personnel involved in the SBP program at Enviva Cottondale are knowledgeable and demonstrated understanding SBP procedures. The organization maintains an effective tracking program (Track and Trace) 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, except 2.1.1, 2.1.2, 2.2.3, 2.2.4 and 2.4.1. 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.

### 7.3 Collection and Communication of Data

Enviva Pellets Cottondale has a comprehensive database where all Standard 5 data is compiled and maintained. All compilation is conducted by personnel at Enviva corporate in Bethesda, MD. Records and data are maintained separately for each facility under the Enviva umbrella. For Enviva Pellets Cottondale, 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 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. Interviews and desk audit with corporate personnel confirmed knowledge of Standard 5 data requirements and accurate management of data.

## 7.5 Stakeholder feedback

Enviva has received two stakeholder comments about Wildlife Best Management Practices and has responded adequately to the comments. SCS reviewed the comments made and Enviva's response. No other comments came to the attention of SCS and SCS did not conduct a stakeholder consultation for this audit.

## 7.6 Preconditions

Not Applicable

## 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.*

Review of Initial Assessment of Risk designated all core indicators as low, except 2.1.1, 2.1.2, 2.2.3, 2.2.4 and 2.4.1. Risk ratings were determined by reviewing the SBE, SBR and other supporting evidence such as Feedstock Compliance Implementation Manual, Controlled Wood Controlled Source Risk Assessment, Chain of Custody Procedures, supplier agreements and verification through field visits and interviews. No SVP is required.

**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	Specified	Specified
2.1.2	Specified	Specified
2.1.3	Low	Low
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

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

2.3.1	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

Indicator	Risk Assessment	Management system
<p>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.</p>	<p>The US does not have an SBP approved regional risk assessment that fully considers all of the indicators.</p>	<p>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 in SBR) has been incorporated into the supply base evaluation to supplement Enviva’s ability to accurately map areas of high conservation value</p>
<p>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.</p>	<p>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.</p>	<p>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</p>
<p>2.2.3 The BP has implemented appropriate control systems and procedures to ensure that key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).</p>	<p>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</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</p>

		<p>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 interested stakeholders has extended our reach into</p>

		<p>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.

<b>NC number 1</b>	<b>NC Grading:</b> Minor
<b>Standard &amp; Requirement:</b>	SBP Framework Standard 4: Chain of Custody V1.0, 5.4.1
<b>Description of Non-conformance and Related Evidence:</b>	
Observed volume discrepancy related to 2 DTS transactions and Enviva Cottondale Credit Ledger. DTS transactions matched invoice volumes. Credit ledger contained incorrect volumes for 2 transactions- (54807-Cabrera and 54808 TS Echo).	
<b>Timeline for Conformance:</b>	By the next surveillance audit, but no later than 12 months from report finalisation date
<b>Evidence Provided by Company to close NC:</b>	Volumes corrected in Credit ledger by Region Sustainability Forester- correction observed by auditor during on-site audit.
<b>Findings for Evaluation of Evidence:</b>	Review of DTS and Enviva Cottondale Credit Ledger.
<b>NC Status:</b>	Closed

<b>NC number 2</b>	<b>NC Grading:</b> Observation
<b>Standard &amp; Requirement:</b>	SBP Framework Standard 1: Feedstock Compliance V1.0, 2.7 indicator 2.1.3
<b>Description of Non-conformance and Related Evidence:</b> The BP cites 6 indicators as specified risk in the Supply Base Evaluation, however does not cite 2.1.3. as specified risk for conversion. The SE USA Guidance document for SBP directs BPs towards using available multi-stakeholder risk assessments. The BP had used the Draft FSC US NRA to identify risk, and had done so correctly. Prior to the audit date the finalized version of the FSC US NRA was released with additional counties of specified risk for conversion within the BP’s supply base. The BP is certified for FSC Controlled Wood, and under FSC rules has 6 months, until 5 <sup>th</sup> October 2019 to transition to fully using the FSC US NRA, and mitigate risk therein. Furthermore appendix 1 of the master supply agreements states ‘Enviva will not accept wood for sources being converted.	
<b>Timeline for Conformance:</b>	Other Response is optional.

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

## 11 Certification decision

<b>Based on the auditor's recommendation and the Certification Body's quality review, the following certification decision is taken:</b>	
<b>Certification decision:</b>	Certification approved
<b>Certification decision by (name of the person):</b>	Sebastian Häfele
<b>Date of decision:</b>	09/Jul/2019
<b>Other comments:</b>	<i>Click or tap here to enter text.</i>