

SBP

Sustainable Biomass Program

SCS Global Services' Evaluation of Amite BioEnergy LLC Compliance with the SBP Framework: Public Summary Report

Scope change audit

www.sbp-cert.org



Completed in accordance with the CB Public Summary Report Template Version 1.2

*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: 02/Oct/2017

Report authors: Ellen Kincaid, Tucker Watts

Name of the Company: Drax Biomass Inc., Amite BioEnergy, 1763 Georgia Pacific Road #2, Gloster, MS 39638

Company contact for SBP: Richard Peberdy, richard.peberdy@draxbiomass.com

Certified Supply Base: Louisiana, Mississippi and West-central Alabama

SBP Certificate Code: SBP-04-01

Date of certificate issue: 01/Aug/2016

Date of certificate expiry: 31/Jul/2021

This report relates to the Scope Change Audit

2 Scope of the evaluation and SBP certificate

This certificate covers production and distribution of wood pellets for use in energy production, at Amite BioEnergy LLC and transportation to Baton Rouge Transit LLC for storage, aggregation and seafaring vessel loadout. It covers a Supply Base Evaluation for the sourcing of feedstock from the states of Louisiana and Mississippi and west central Alabama. The certificate also covers the trade of SBP-certified pellets with point of purchase after pellets are unloaded at Baton Rouge Transit, LA and point of sale at seafaring vessel loadout.

3 Specific objective

This certificate covers production and distribution of wood pellets for use in energy production, at Amite BioEnergy LLC and transportation to Baton Rouge Transit LLC for storage, aggregation and seafaring vessel loadout. It covers a Supply Base Evaluation for the sourcing of feedstock from the states of Louisiana, Mississippi and west central Alabama. The certificate also covers the trade of SBP-certified pellets with point of purchase after pellets are unloaded at Baton Rouge Transit, LA and point of sale at seafaring vessel loadout.

The following critical control points were identified and audited:

- Procurement of fiber and documentation of origin, receiving
- Feedstock storage and processing
- Biomass storage, handling and trans-shipment

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

Drax Biomass Inc. (“DBI” or “Company”) is an energy company manufacturing and transporting wood pellets. The Central Office is located in Atlanta, GA. The transportation facility, Baton Rouge Transit (BRT) is located in Baton Rouge, LA. Wood pellets are received from company pellet plants and 3rd party pellet suppliers. DBI owns and operates three pellet plants: Amite BioEnergy LLC (“Amite BioEnergy” or “ABE”) in Gloster, MS, LaSalle BioEnergy LLC (“LaSalle BioEnergy” or “LBE”) Urania, LA, and Morehouse BioEnergy LLC (“Morehouse BioEnergy” or “MBE”) near Beekman, LA. LBE and MBE are covered under the scope of separate certificates. All feedstock inputs for ABE are covered under the Supply Base Evaluation that was conducted by the Biomass Producer (“BP”). ABE currently receives roundwood and residual fiber from local suppliers. Deliveries are from stumpage located within 70 to 100 miles of ABE. One supplier owns the land and timber. Remaining suppliers purchase stumpage from private landowners and deliver the fiber to ABE. Roundwood and residual fiber are received at ABE via truck. The scope expansion of this audit is to expand the basin of one residual fiber supplier into west central Alabama. Once the pellets are manufactured at ABE, the finished product is transported via truck to BRT for storage, aggregation and seafaring vessel loadout. Drax Biomass also trades third party pellets from one supplier in the US. Drax Biomass takes legal ownership after pellets have been unloaded at BRT and passes on legal ownership once pellets are loaded onto seafaring vessel.

5.2 Description of Company’s Supply Base

ABE’s fiber procurement catchment includes southern Louisiana, west-central Alabama and Mississippi in the United States. ABE draws feedstock within a 70-mile radius, but maintains the ability to procure out to a 100-mile radius in response to market pressures and weather events, and also procures secondary feedstock from as far as 200 mi away. All statements based on the 100-mile radius are made for precautionary purposes.

Description of ABE and supply base as noted in the Biomass Producer’s Public Summary Report

The ABE facility is designed to consume 800,000 to 1 million green metric tons of biomass material per annum. The sourced material is comprised of mainly southern yellow pine (SYP) with a potential de minimis quantity of mixed southern hardwoods. The material arrives in the form of low grade roundwood, thinnings, tops, logging and mill residues. According to the USDA Forest Service Timber Products Output Reports, consumption by other forest industry participants within 150 miles of ABE’s fiber catchment in 2009 was estimated to be in excess of 20 million metric tonnes per annum which puts into perspective the ability of the catchment to supply the forest products industry. Pulp and chip mills in the region have an average capacity of around 1 million tons per facility per year, with some consuming well over 2 million tons per year. Sawmills are slightly smaller, consuming on average around 300,000 tons per year.

Forestry is the dominant land use in ABE's catchment. The majority of forests in these areas have been harvested several times during the 19th and 20th Centuries. Over 80% of the forests are privately owned, with most owned by "non-institutional private family forest owners". As the average size of these holdings is less than 100 acres, some owners may have income from sources other than their forest holdings. There is also a significant amount of land owned and managed by large corporations (institutional investors), which typically practice more intensive silviculture and land management driven by the need to produce shareholder returns than the smaller family forest landowners who typically manage to achieve more diverse and competing objectives.

While forest coverage has stayed steady in these areas during the past 40-50 years, the forests have become increasingly productive in that time. Forest Inventory Analyses data shows that growth per acre per year has doubled in the US South since the 1950's, and it continues to increase as healthy markets provide incentives for owners to invest in forest management. Put simply, landowners' access to markets helps to ensure that their forests remain as working forests.

Recent changes in the US pulp and paper industry have resulted in the closure of several large pulp mills in or adjacent to the catchment that collectively previously consumed over 3 million tonnes of feedstock each year. The emergence of a wood pellet market has benefited forest owners and contractors in the area by offsetting a portion of the lost demand from the closed pulp mills.

The overall market downturn, subsequent housing market crash of 2008 and the slow recovery in residential construction has resulted in reduced levels of demand for sawtimber. This produced an increase in stocks of larger-diameter trees, with a corresponding reduction in felling and replanting. These market dynamics have long-term consequences for the structure of the forest.

Looking to the future, further increases in pine forest productivity can be achieved through simple measures such as planting with improved seedlings and implementing diligent forest establishment practices. We will seek to engage with and support this process through the sharing of information and supporting sensible partnerships that promote forest certification through direct landowner contact. In areas with strong markets for forest products, we should expect forests stay as working forests, whereas other areas may cycle out of forestry into row crops or husbandry, and other agricultural areas may cycle back into forestry. Urban expansion remains the biggest threat to the forest area. Private ownership is expected to remain the main form of forest ownership, but there may be fragmentation as land is split into smaller parcels as it is passed down through generations, thereby creating challenges to implement good forest management practices.

Forestry and Land Management Practices

There is a mature and well-developed forest sector in this geography. Described as a "wood basket to the world", the US South has grown, harvested and sold many hundreds of millions of cubic meters per year for many decades, while seeing both its forest inventories and productivity levels increase. In the US South as a whole, and in the organization's catchments, annual growth exceeds annual drain by a significant margin (USDA Forest Service, 2010)¹.

¹ USDA Forest Service Forest Inventory Analysis Program. 2010 data assessed and critiqued by consultancy for procurement region. Accessed May, 2012. Database accessible at <http://www.fia.fs.fed.us/>.

The main reasons for this include a productive land base that benefits from long growing seasons, sufficient precipitation, and healthy soils, as well as the longstanding engagement of experts and professionals from across industry, academia and public agencies in helping to advance sound forest management practices. Species selection is another important factor, as the majority of landowners grow trees that are indigenous to the area, which creates environmental and economic benefits, such as maintenance of habitats for local flora and fauna, as well as establishing a resilient native growing stock with improved pest and disease resistance. Federal and state governments also provide effective oversight to ensure that forest activities comply with relevant laws and regulations and minimise environmental harm. Moreover, each state employs well-established “Best Management Practices”, with programs to promote logger training and audits that demonstrate high compliance rates.

Though the region also possesses a vigorous and productive hardwood sector, ABE primarily uses Southern Yellow Pine (SYP), an abundant and highly productive native species. Production and sale of sawlogs remains the main economic driver for landowners, with SYP rotation lengths typically ranging from 20-40 years. The shorter rotations are for the most productive trees on the best sites, while the longer rotations typically apply to trees grown on lower quality sites.

Thinning is an important forest management strategy for growing sawlog-quality SYP. Stands are typically thinned at 12 years and again at 18 years old to promote faster growth of the remaining trees. Thinning also allows more light, moisture and nutrients to reach the forest floor, which increases the vitality of the forest and also offers recreational benefits. Forest thinnings make up a significant proportion of the feedstock for ABE.

Rotation harvest of SYP is typically conducted through clear cutting. SYP is not tolerant of shade, so the next rotation of young trees requires abundant access to light to grow well. ABE accepts material from rotation harvests, although this is typically limited to residuals and roundwood that are not sold into higher paying markets. The vast majority of material from rotation harvests are sold into sawlog markets.

The next rotation may be re-established through natural regeneration, or the planting of seedlings, or a combination of both. Reforestation often involves some ground preparation to control competing vegetation.

There are no Convention on International Trade in Endangered Species of Wild Flora and Fauna (“CITES”) listed species in the catchment that are threatened or otherwise impacted by forest management activities. There is one International Union for Conservation of Nature (“IUCN”) Red List species that is worthy of note – Longleaf pine (*pinus palustris*). This species is far less common than it once was, and efforts are underway to promote longleaf pine coverage in the region. The intent of listing species to the Red List is not to promote prohibition of their use but rather to heighten priority setting for conservation of the species (IUCN 2014)².

Critical to the recovery of the species is continued access to markets for longleaf pine. If landowners do not expect to be able to sell this wood, then they will not plant the tree in the first place. This position is captured in a statement from a USDA researcher and supported by the conservation group the Longleaf Alliance:

² IUCN Standards and Petitions Subcommittee. 2014. Guidelines for Using the IUCN Red List Categories and Criteria. Version 11. Prepared by the Standards and Petitions Subcommittee. Downloadable from <http://www.iucnredlist.org/documents/RedListGuidelines.pdf>.

“Strong markets for forest products provide incentives for private landowners to keep their lands in forest cover (Wear 2013). This is particularly important across the longleaf range where recent forecasts of human population and income growth point toward increasing pressure in some locations to convert forest land to other uses (Wear 2013) . Strong markets also enable landowners to invest in the management practices required to establish longleaf pine forests and implement practices such as prescribed fire and thinning which are crucial restoration activities .”

The Supply Base Evaluation on the Biomass Producer’s website can be found under this link:
<http://draxbiomass.com/sustainability/certifications/>

5.3 Detailed description of Supply Base

State forestry websites feature detailed descriptions of forests and include noteworthy facts about each state’s forests. Forest Inventory Analyses data is also publically available, and provide many important parameters, including changes over time, in the states that supply ABE. A thumbnail of ABE’s forest coverage summary shown in the tables present in the BP’s Public Summary Report. Charts detailing the land ownership, species distribution, and age class of forested areas surrounding ABE are shown in the BP’s Public Summary Report. A quantitative description of the Supply Base can also be found in the Biomass Producer’s Public Summary Report.

Qualitative description of the supply base:

- Total Supply Base area (hectares): 3.9 million ha cumulative area of all forest types within Supply Base
- Tenure by type (ha):
- Privately owned ca. 88% (c. 75% private, c. 13% large corporates, investment-institutional).
- Public ca. 12%
- Community concession de minimis
- Forest by type (ha): 4 million ha Temperate
- Forest by management type (ha):
- Plantation 0.6 million ha (ca. half the softwood area)
- Managed Natural ca. 3.4 million ha (remainder of the pine, mixed forests, hardwood areas)
- Natural Less than 200,000 ha
- Certified forest by scheme (ha): Not known in detail for catchment. *PEFC-endorsed forest management schemes: SFI® and American Tree Farm™™ are the predominant schemes, with minor areas of FSC® certified forest. DBI expects the feedstock supply to generally mimic the certified percentage offerings state wide. DBI estimates the ability to procure a conservative 20% of feedstock from certified sources.
- Total volume of Feedstock: 800K to 1.0M green metric tonnes
- Volume of primary feedstock: 600K to 800K green metric tonnes
- List of species in primary feedstock: Predominantly Southern Yellow Pine – Majority Loblolly Pine (*Pinus taeda*), smaller quantities of other pines – Slash pine (*Pinus elliotii*), Shortleaf pine (*Pinus echinata*), Spruce pine (*Pinus glabra*), Virginia pine (*Pinus virginiana*) and de minimis volumes of Longleaf Pine (*Pinus palustris*)-see comments in Presence of CITES or IUCN species section. Minute component of mixed southern hardwoods, various varieties of oak, maple, hickory, ash and others-Full list of 56 hardwood species available.

- Forest Management Schemes (estimated ranges):
- ca. 20% to 39% certified to an SBP-approved Forest Management Scheme
- ca. 60% to 79% not certified to an SBP-approved Forest Management Scheme

For a more quantitative description of the Supply Base please refer to the publically available Supply Base report of the Biomass Producer.

5.4 Chain of Custody system

The Chain of Custody System is managed by Richard Peberdy, VP, Sustainability. He is assisted by David James, Manager, Sustainability. All locations are part of a multi-site system managed by the Central Office. DBI is certified to the FSC®, SFI®, and PEFC™ Chain of Custody Standards.

Processing involves the receiving of roundwood and residual fiber by the pellet plant. The raw material is converted to chips and moisture is driven away for pelletizing. DBI uses the credit system at its BPs to determine claims for both SBP and FSC® certified pellets. All material received at ABE is covered under the Supply Base Evaluation. Following pelletizing at ABE, pellets are transported by truck to BRT. BRT receives wood pellets from company owned plants and 3rd party plants. Wood pellets are then received, stored, and shipped.

Raw material is sourced as roundwood and residual fiber by ABE. During the start-up phase, most of the volume was received from a single forest management certified supplier. As operations ramped-up production to the designed run level, additional suppliers were added. Pellets received at BRT are from 3rd party suppliers and from company plants. Upon audit, DBI has purchased and sold 3rd party pellets. 3rd party pellet suppliers are SBP certified. At ABE, raw material is received with a Master Contract, Purchase Order, and Delivery Ticket which contains supplier information. The Purchase Order and Delivery Ticket contain the tract name, and state, county, and location of the tract. Volumes are entered electronically into the 3LOG System for receiving, inventory, and shipping. Traceability and segregation are provided by the 3LOG System. Sales and deliveries are internal transfers from ABE to BRT. BRT ships pellets to the parent company in England. The ownership of the pellets is transferred to the parent company upon loading of the vessel.

6 Evaluation process

6.1 Timing of evaluation activities

Activity	Date	Location	Persons Involved	Time
Scope Expansion Audit	December 1, 2017	Amite BioEnergy,	Drax Biomass Inc. Richard Peberdy, David James, Jim Stemple Supplier Representative Kyle Bush SCS Tucker Watts, Ellen Kincaid	4 hours

6.2 Description of evaluation activities

The scope expansion audit to include west central Alabama into the Supply Base Evaluation began with a discussion of the expansion area and the reason for the expansion. Significant changes to the Principles, criteria, and indicators of Standard 1 and Standard 2 were discussed and reviewed. A telephone interview of the single mill that could procure raw material in west central Alabama was conducted to verify the supply basin, activities conducted, and impacts by the mill in west central Alabama.

6.3 Process for consultation with stakeholders

SCS conducted a stakeholder consultation for this expansion of scope audit and combined this SHC with the one conducted for DBI LaSalle mill SBP Main Evaluation. An initial 30-day stakeholder consultation was performed August 28, 2017 prior to the expansion of scope audit. The stakeholder consultation was sent to stakeholders in a region that corresponds to the entirety of Drax Biomass' Supply Base of Arkansas, Louisiana, Mississippi, east Texas, and west-central Alabama. Amite BioEnergy intends to only source material from Louisiana, Mississippi and west-central Alabama.

7 Results

7.1 Main strengths and weaknesses

Strengths with respect to the BP's overall conformity include the diversity of sources used for the development of the SBE and the experience of the persons conducting the SBE. Members of the organization have been and continue to be involved with the development of the SBP Standards and their evolution. Within the development/management team there are many years of experience in the area of operation. The capture of energy and GHG data works well, is centralized in a database system and substantiated by appropriate evidence. For identified weaknesses please refer to the non-conformities and observations section 10 in this report.

7.2 Rigour of Supply Base Evaluation

Rigor of the Supply Base Evaluation was sufficient to document the findings of low risk. Use of documented reports and assessments, in combination with local experts, personal knowledge, and stakeholder comments provided a multi-faceted approach for evaluation of each indicator. The scope statement adequately describes the characteristics of the supply base and management systems. The same process was conducted for the scope expansion for counties in west central Alabama. Rigor of evaluation sufficiently identifies the expansion as having no change as to the findings of low risk for the SBE.

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). As this was an expansion of scope audit to include a change in the supply base, SBP Std. 5 was not part of the audit scope.

7.4 Competency of involved personnel

The Supply Base Evaluation was a joint effort of internal and external expertise. Persons involved are very competent for the development and on-going monitoring of the Supply Base Evaluation. Internal team consists of professionals that have a long history and expertise of working in the Supply Base individually, as well as in groups and associations. Internal team members have been actively involved in the development of the SBP requirements. The consultant used for the SBE has performed many resource based assessments of similar criteria for forest management systems.

7.5 Stakeholder feedback

One inquiry was received for further information and a potential field visit. On November 20, 2017 SCS had a phone call to discuss the potential of joining the audit for a site visit. The stakeholder opted to reach out directly to Drax and have an in-person meeting. No further follow up was deemed necessary as there was no complaint or concern expressed and only a desire for more information on Drax's procedures.

7.6 Preconditions

No preconditions were issued by the certification body.

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.

SCS assessed risk for the criteria by evaluating comments received during the stakeholder consultation conducted by both SCS and DBI, reviewing the SBR, SBE and means of verification DBI developed, interviews with relevant staff, and conducting interviews with suppliers of secondary material.

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
2.2.8	Low	Low
2.2.9	Low	Low
2.3.1	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

2.3.2	Low	Low
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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

No specified risks were identified and thus, mitigation measures have not been developed.

10 Non-conformities and observations

Identify all non-conformities and observations raised during the evaluation (a tabular format below may be used here). Please use as many copies of the table as needed. Click on the  symbol on the right bottom corner of the table to repeat the table. 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 <i>Enter number</i>	NC Grading: <i>Choose grading.</i>
Standard & Requirement:	<i>Click to enter SBP standard and requirement reference</i>
Description of Non-conformance and Related Evidence:	
<i>Click or tap here to enter NC description.</i>	
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:	<i>Choose status.</i>

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:	03/05/2018
Other comments:	<i>Click or tap here to enter text.</i>