



Sustainable Biomass Program

# SCS Global Services Evaluation of Westervelt Renewable Energy, LLC Compliance with the SBP Framework: Public Summary Report

Third Surveillance Audit

Scope Change Audit

[www.sbp-cert.org](http://www.sbp-cert.org)



## Completed in accordance with the CB Public Summary Report Template Version 1.3

*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](mailto:sharris@scsglobalservices.com)

Current report completion date: 22/Jun/2018

Report authors: Ellen Kincaid and Tucker Watts

Name of the Company: Westervelt Renewable Energy, LLC; 1400 Jack Warner Pkwy, N.E.  
Tuscaloosa, AL 35404

Company contact for SBP: Mike Williams, [mwilliams@westervelt.com](mailto:mwilliams@westervelt.com)

Certified Supply Base: Alabama, Mississippi, Arkansas, Georgia, Louisiana, Mississippi, North Carolina, South Carolina and Tennessee and select counties from Missouri, Texas, and Florida.

SBP Certificate Code: SBP-04-13

Date of certificate issue: 12/Nov/2015

Date of certificate expiry: 20/Sep/2020

This report relates to the Third Surveillance & Scope Change Audit

## 2 Scope of the evaluation and SBP certificate

This certificate covers the manufacture, transport to the port of Mobile, AL and trading of wood pellets. It also includes a supply base evaluation for sourcing of primary feedstock from Alabama and Mississippi and secondary feedstock from Alabama, Arkansas, Georgia, Louisiana, Mississippi, North Carolina, South Carolina and Tennessee and select counties from Missouri, Texas, and Florida.

### 3 Specific objective

The specific objective of this surveillance audit was to confirm that Westervelt Renewable Energy, LLC's management system is capable of ensuring that all requirements of specified SBP Standards are implemented across the entire scope of certification.

The following SBP critical control points were identified and audited:

- Supply base evaluation
- Feedstock procurement. Procurement procedures, FSC CW due diligence system and operations were audited. Further information on the critical control point are given in section 5.
- Receiving of feedstock and storage: Material is received at the plant via truck and segregated according to physical characteristics.
- Accounting of volumes: Accomplished via Credit System. See section 5.4 for more information.
- Documentation of transactions. Accomplished via the DTS and invoices
- Collection and reporting of energy and greenhouse gas data. BP is certified to SBP Standard 5 and has been audited to that standard.

## 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

Westervelt Renewable Energy, LLC (herein referred to as 'Westervelt') is a part of The Westervelt Company, an integrated forest products company that manages over 500,000 acres of SFI, and partially FSC, Forest Management certified timberland and has a large southern pine sawmill located in Moundville, AL. The pellet facility is located near Aliceville, AL on the Tombigbee waterway and pellets are loaded onto barges, shipped down to Mobile and loaded onto bulk cargo ships.

The supply base area for secondary feedstock includes Alabama, Mississippi, Georgia, South Carolina, North Carolina, Tennessee, Arkansas, and Louisiana in addition to certain counties in Florida, Texas, and Missouri. Primary softwood feedstock originates in Alabama and Mississippi mainly due to haul distance constraints. The majority of feedstock is generated within approximately 150 miles of the plant; however, the supply base area includes the supply basins for sub-suppliers.

Westervelt purchases secondary residuals from the company's sawmill and from third-party generators of residual materials. Primary feedstock is sourced directly from company owned or managed sources, private (family & institutional) landowners, and a de minimis amount from state lands. A gradual increase in the availability of residual material is underway throughout the region and coincides with increased housing starts.

Westervelt's raw material sourcing activity for pellet production is similar to other industries in the region, although on a smaller scale. The most notable changes include new and/or expanded capacity sawmills in the Southeast U.S. and the expansion of existing wood processing facilities, all of which result in increased secondary residual supply. Westervelt provides an outlet for feedstocks that would otherwise be difficult to utilize in the supply base area.

Westervelt utilizes secondary residues from softwood and hardwood species in addition to round wood softwood. Secondary residues include sawmill shavings, sawdust, and chips while round wood includes tops, limbs, non-merchantable wood from final harvest tracts, and forest thinnings. Although the primary input is secondary residues, the plant has the ability to utilize round wood. The facility does not utilize saw logs, nor do we use any construction, demolition, treated, or post-consumer derived feedstock. When round wood is sourced, residue bark generated on-site is utilized as furnace fuel for the dryer and is supplemented by external bark purchases as needed. External bark is sourced from sawmills and chip mills from a variety of wood species.



## 5.2 Description of Company's Supply Base

The supply base area for secondary feedstock includes Alabama, Mississippi, Georgia, South Carolina, North Carolina, Tennessee, Arkansas, and Louisiana in addition to certain counties in Florida, Texas, and Missouri. Primary softwood feedstock originates in Alabama and Mississippi mainly due to haul distance constraints. The majority of feedstock is generated within approximately 150 miles of the plant; however, the supply base area includes the supply basins for sub-suppliers.

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**Protected Species:** Westervelt does not utilize feedstock from any Convention on International Trade in Endangered Species of Wild Flora and Fauna ("CITES") listed species. The International Union for Conservation of Nature™ ("IUCN") identifies Longleaf Pine (*Pinus palustris*) as endangered and Westervelt notes the presence of this species in our supply area. The company is not opposed to the use of Longleaf pine provided the land from which the fiber originates is ultimately returned to Longleaf or the species which was present prior to the planting of Longleaf and supports the mission of the Longleaf Alliance in encouraging markets for the sustainable consumption of this species in order to perpetuate its existence. For further information please refer to Westervelt Renewable Energy, LLC Statement on Longleaf Pine dated March 1, 2018.

**Harvest & Delivery:** For primary wood the company utilizes contract logging crews, many of which work exclusively for Westervelt (the parent company of Westervelt). These crews are responsible for harvesting and transportation of raw material to the facility, all of which is delivered by truck. Secondary residuals are delivered by truck by the suppliers of those materials.

A copy of the company's SBR is found at <https://sbp-cert.org/accreditations-and-certifications/certificate-holders/westervelt-renewable-energy-llc>

### 5.3 Detailed description of Supply Base

f. Total volume of feedstock: 0-200,000 green metric tons

g. Volume of primary feedstock: 0-200,000 green metric tons

h. List percentage of primary feedstock (g), by the following categories.

Subdivide by SBP-approved Forest Management Schemes.

- Large forest holdings certified to an SBP-approved Forest Management Schemes: 0%-19%

- Large forest holdings not certified to an SBP-approved Forest Management Schemes: 80%-100%

- Small forest holdings certified to an SBP-approved Forest Management Schemes: 0%-19%

- Small forest holdings not certified to an SBP-approved Forest Management Schemes: 00%-19%

i. List all species in primary feedstock, including scientific name:

Loblolly Pine (Pinus taeda)

Shortleaf Pine (Pinus echinata)

Slash Pine (Pinus elliotti)

Virginia Pine (Pinus Virginiana)

Longleaf Pine (Pinus palustris)

j. Volume of primary feedstock from primary forest: None

k. List percentage of primary feedstock from primary forest (i), by the following categories.

Subdivide by SBP-approved Forest Management Schemes.

- Primary feedstock from primary forest certified to an SBP-approved Forest Management Schemes:

0%-19%

- Primary feedstock from primary forest not certified to an SBP-approved Forest Management Schemes:

0%-19%

l. Volume of secondary feedstock: 80%-100% residues

m. Volume of tertiary feedstock: 0%-19%

\* Banding, where used, is in place of specific volumes due to commercial sensitivity. For more quantitative information on the supply base please refer to BP's Supply Base Report

## 5.4 Chain of Custody system

The Company is SFI/PEFC/FSC Chain of Custody certified and utilizes the systems already in place to track SBP certified biomass. Pellets are stored on-site, loaded onto barges and barged down the Tombigbee Waterway to the port of Mobile, AL where they remain on the barges until loaded on a ship. Title transfers when the pellets are loaded on the ship.

## 6 Evaluation process

### 6.1 Timing of evaluation activities

Date – Activity – People involved – location – Approximate time

April 13 – Opening meeting – SCS Global Services: Tucker Watts & Ellen Kincaid, Westervelt: Mike Williams – Remote – 20 minutes

April 13 - GHG analysis/Standard 5 – SCS Global Services: Ellen Kincaid, Westervelt: Mike Williams – Remote – 8 hours

April 23 through 26 – CoC and SBE/SBR review/ Standard 1, 2, & 4 – SCS Global Services: Tucker Watts, Westervelt: Mike Williams (see list below) - 16 hours

April 23 through 26 – Field visits – SCS Global Services: Tucker Watts, Westervelt: see list below - 16 hours

April 26 – Closing meeting – SCS Global Services: Tucker Watts & Ellen Kincaid, Westervelt: Mike Williams (see list below) - 20 minutes

List of people interviewed by Tucker Watts: Jonathan Lowery – Forest Sustainability and Policy Manager; Clint Woods – Procurement Manager; Mike Williams – Project Director; Rick Powell – Procurement Manager; Chris Chambers -Procurement Forester; Rolf Singleton – Harvest coordinator; Brad Gibson – Harvest Coordinator; Richard Howell – Silviculture Forester; Austin Lindsay – Silviculture Forester; Renee Cabiness – Westervelt Pellets – HR/Administrative Assistant; Rusty Montz – Westervelt Lumber Scale House Operator; Eldred Moore – Environmental Operations Ranger; Kendra Wiard – Harvest Scheduling Forester; Jamie McKinnon – Harvest Scheduling Manager; Tyler Stewart – Silviculture Ranger

### 6.2 Description of evaluation activities

SCS Global Services initiated the SBP audit process with a planning call to confirm the scope of the audit, determine whether any changes had occurred in the Company's policies and procedures and set the audit dates. SCS Global Services then prepared a detailed audit plan and conducted the SBP Surveillance Audit of conformance to the SBP Standards with focus on the SBE/SBR and chain of custody requirements.

The audit was governed by a detailed audit plan designed to enable the audit team to efficiently determine conformance with the applicable SBP requirements. The plan provided for the assembly and review of audit evidence consisting of documents, interviews, and on-site inspections of ongoing or completed forest practices and management systems.

During the audit samples of the written documentation assembled to provide objective evidence of SBP Conformance were reviewed. SCS Global Services also selected field sites for inspection based upon the risk of environmental impact, likelihood of occurrence, special features, and other criteria.

## 6.3 Process for consultation with stakeholders

SCS Conducted Stakeholder Consultation:

Geographical area(s): The geographical area for the stakeholder consultation is the same as the supply areas identified in the company's Supply Base. This stakeholder consultation included Alabama, Mississippi, Arkansas, Georgia, Louisiana, Mississippi, North Carolina, South Carolina and Tennessee and select counties from Missouri, Texas, and Florida.

List of Stakeholders invited: 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. 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 area(s). Relevant FSC Network Partners were also included in the invitation process.

SCS launched their stakeholder consultation for the Evaluation audit of the Westervelt Renewable Energy facility on November 27, 2017 from SCS's Emeryville office to stakeholders. Stakeholders had the opportunity to present their points of view to the auditor(s) in confidence.

SCS received two comments regarding Westervelt's procurement operations / supply. Both were positive in nature. SCS Global Services acknowledged receipt and thanked the stakeholders for their responses. No other action was necessary.

Attached is the actual notification for Westervelt. They were selected to geographical relevance to Westervelt's supply base:

"This email is being sent to you because SCS Global Services (SCS) has identified you as a potential stakeholder able to provide relevant comments regarding Westervelt's fiber sourcing program as a Biomass Producer (BP) within the Sustainable Biomass Program (SBP) framework.

Background – About SBP

SBP was formed in 2013 by European utilities that are using biomass, mostly in the form of wood pellets or chips, in large thermal generating plants. Biomass-fired power and heat generation is seen as an important technology for achieving the EU's 2020 renewable energy targets and EU member states are adopting their own national approaches to ensuring that the biomass used is legally and sustainably sourced.

SBP's objective is to develop the tools necessary to demonstrate that, as a minimum, solid biomass used for energy production meets these national requirements. The SBP Framework is designed as a clear statement of principles, standards and processes necessary to demonstrate such compliance. Wherever possible, the Framework takes into account and builds on existing regulatory mechanisms and on voluntary certification standards already applied to other forest product streams or to other biomass sources.

The SBP Framework provides a means to collect data describing the nature of the feedstock as well as data to be employed in the regulatory calculations of greenhouse gas (GHG) savings from its use. It also provides a means to demonstrate that risks to forest carbon stocks are managed and that forests' carbon sequestration capability is maintained.

Collectively, the six SBP Standards represent a certification framework, or scheme, against which organizations can be assessed for compliance by independent third-party Certification Bodies (CBs) such as SCS. An organization that satisfactorily demonstrates compliance receives a certificate and is entitled to make SBP claims in relation to its biomass.

For more information, and/or to obtain copies of the six SBP standards, please visit:  
<http://www.sustainablebiomasspartnership.org/>

#### Notification

SBP does not require that certification bodies such as SCS consult stakeholders during the annual surveillance audits of BP's. However, this BP is expanding their supply base, so the upcoming audit represents SCS' first chance to engage with stakeholders in a specific geographic region in order to verify that the BP's management systems are working effectively and consistently across their entire supply base.

Attached is their Supply Base Evaluation (SBE) for your consideration.

#### Consultation

With this email, SCS encourages interested stakeholders to submit relevant information and/or comments regarding the BP's forest management and fiber sourcing/procurement operations, in order to evaluate the BP's compliance with SBP requirements. SCS will:

- review and record all submissions
- evaluate relevant submissions
- document actions taken in relation to relevant submissions, and
- document its conclusions regarding compliance of the BP with the Standards.

If you have any questions/concerns regarding this notification, please email us back and we will follow up with you accordingly.

If you are not interested in participating or providing any comments for this organization, then you do not need to do anything at all in response to this email.

If you would like to be permanently removed from our stakeholder list (and thus not receive any future notifications in regards to this, or any other company), please reply with 'remove'.

Best regards,"

## 7 Results

### 7.1 Main strengths and weaknesses

Westervelt Renewable Energy was well organized and has a good system for maintaining its certification. For details on weaknesses please refer to the nonconformity section.

### 7.2 Rigour of Supply Base Evaluation

Westervelt Renewable Energy has a rigorous evaluation process for their SBE. The evaluation consists of information collected by company foresters, supplier's foresters, and various state, federal, and private agencies. SBE by Westervelt focuses on analysis of the SBE requirements for 3 potential supplier groups: Fee and purchased stumpage with harvesting controlled by Westervelt; Stumpage harvested by wood suppliers and purchased by Westervelt upon delivery; Bi-products delivered to Westervelt from manufacturing facilities. Supply base information and harvest monitoring data is collected on all fee and purchase stumpage. Supply base information is collected on all stumpage harvested by wood suppliers.

Harvest monitoring is conducted on a 10% sample of these tracts. Summary information is collected on the origin and harvesting of stumpage by the by-product suppliers. Information collected is directly from the supplier, and from interviews with local stakeholders. Additional information is collected from state, federal, and various other websites.

### 7.3 Collection and Communication of Data

The company was well-informed on what information needed to be collected and communicated and had thought through many of the potential hurdles to the process, offering the auditor answers before the question even arose.

### 7.4 Competency of involved personnel

Team qualifications for the development of the SBE are:

Michael Ferrucci: Ferrucci is a Partner in INTERFOREST, LLC, and a Partner in Ferrucci & Walicki, LLC, a land management company that has served private land owners in Southern New England for over 15 years. Its clients include private citizens, land trusts, towns and cities, corporations, private water companies and non-profit organizations. He has a B.S. degree in Forestry from the University of Maine, Orono, and a Master of Forestry degree from the Yale School of Forestry and Environmental Studies. His primary expertise is in management of watershed forests to provide timber, drinking water and the protection of other values; in forest inventory and timber appraisal; hardwood forest silviculture and marketing; and the ecology and silviculture of natural forests of the north-eastern United States. He is a member of the Forest Practices Advisory Board of the State of Connecticut, past Chairman and Executive Committee member of the Connecticut Tree Farm Committee, and a frequent speaker on logging and water quality in wetlands. He also

lectures on Private Sector Forestry, Leadership and Forest Resources Management at the Yale School of Forestry and Environmental Studies. He has overseas experience in Angola.

Clint Woods: Woods is the Fiber Procurement Manager for Westervelt Renewable Energy, LLC and formerly Chain of Custody and Controlled Wood Coordinator for Westervelt. He has a BS in Forest Management from Mississippi State University, is a Registered Forester, Professional Logging Manager, and is experienced in developing FSC Chain of Custody and Controlled Wood Procedures. He has over 15 years of procurement experience in the Westervelt supply base area.

Mike Williams: Williams is Project Director, Business Development at Westervelt. He has a BS from Morehead State University, completed the Advanced Management Program at Duke University, holds a Certificate of Process Mastery from Hammer & Company, and is a certified Six Sigma Black Belt. He has over 30 years of forest products industry experience with expertise in project development, strategy & planning, process management, procurement, quality systems & analysis, and supply chain logistics. He also has biomass project development experience, participated in the SBP working group during development of the standard, and is a member of the SBP Stakeholder Consultation Committee.

Jonathan Lowery: Lowery is Forest Sustainability & Policy Manager for the Forest Resources Division of the Westervelt Company and has over 15 years of experience in forest inventory and scheduling. He has a BS in Forestry from Mississippi State and is a Registered Professional Forester. He is responsible for the company's certifications in SFI, FSC, PEFC forest management standards.

## 7.5 Stakeholder feedback

Two stakeholder comments were received during the past audit cycle. The first comment mentioned consistent high rates of implementation of BMP and internal environmental guidelines by Westervelt foresters. The second stakeholder comment also mentioned a very good performance with regards to BMP through Westervelt and that Westervelt practices good stewardship of their lands. SCS thanked the stakeholders for their comments and no further action was necessary.

## 7.6 Preconditions

None.



## 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.*

US. The auditors reviewed the risk assessment and followed standard audit trails to confirm sensitive or important elements of the approach. Auditing techniques used were a review of the risk assessment with a sample of the evidence provided, field audits and interviews with procurement staff.

**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
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

**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.

<b>NC number 1</b>	<b>NC Grading:</b> Observation
<b>Standard &amp; Requirement:</b>	ID 5B 3.2.1, ID 5C 3.2.1
<b>Description of Non-conformance and Related Evidence:</b>	
<p>The Reporting Period stated in the SAR is January 1, 2017 – December 31, 2017, however all data is from the dates of September 11 – December 31, 2017 due to a catastrophic plant failure in 2016. The reduced Report Period information has been justified in the SAR, and precedence has been created for having a continuous Reporting Period with reduced months of calculation from their previous SAR which ran from January 1 2016 – December 31, 2016 but only have supporting evidence through October 2016 due to the aforementioned catastrophic plant failure. It is important for Westervelt to continue to ensure complete clarity on the data recorded in the SAR and the dates.</p>	
<b>Timeline for Conformance:</b>	Other  NA
<b>Evidence Provided by Company to close NC:</b>	Revised SAR
<b>Findings for Evaluation of Evidence:</b>	The SAR has been revised and the reporting period is correctly and consistently reported in the SAR. OBS addressed adequately.
<b>NC Status:</b>	Closed

NC number 2	NC Grading: Minor
Standard & Requirement:	SBP Standard 1, 2.7 Criteria 2.1.2, 2.1.3, 2.2.1, 2.2.3, 2.2.4; SBP Standard 2, 11.7
Description of Non-conformance and Related Evidence:	
<p>The low risk conclusion for some criteria is not sufficiently supported by evidence. Criterion 2.1.2 &amp; 2.2.4: The BP relies on the implementation of BMPs to protect High Conservation Value (HCVs) and biodiversity. However, the purpose of BMPs is to protect the aquatic environments against non-point source pollution like soil erosion, stream sedimentation, and thermal pollution but does not necessarily provide protection for all types of habitats with critical value. The monitoring of BMP implementation rates and the contractual obligation to use BMPs are not sufficient to conclude risk especially for the supply of secondary feedstock across all 11 states in the supply area. Specifically, the link between BMP implementation and the conservation of HCVs and biodiversity values is not explained in sufficient detail to support the low risk designation. The organization’s supplemental information on HCV and Sourcing Risk also lists effective BMP implementation as main body of the evidence to conclude low risk. Furthermore, the use of trained loggers is required, but it has not been shown how the organization ensures that trained loggers are used in the sourcing of secondary feedstock and if and how trained loggers effectively help protect HCVs. In Exhibit B in the SBE, the BP lays out the different areas that are within the supply base and contain biodiversity values, HCV and key ecosystem habitats. The conclusion for low risk is based, among others, on these main means of verification: Monitoring of BMP implementation rates and the existence of BMPs in the supply base; the use of trained loggers; the adherence to state and federal laws; the dissemination of Westervelt’s HCV Area Alert. Together with audits of suppliers of primary fiber, these means of verification provide good evidence for a low risk conclusion for primary fiber in the supply base. However, it is not clearly described in the supply base evaluation how these control systems and procedures are used to protect high conservation values in areas with sources of secondary feedstock. It is not shown conclusively how the BP can ensure that HCV are protected in areas where secondary fiber originates. Questions remain as to how the control systems accomplish the following: how is it ensured that suppliers make use of the HCV alert to protect HCV? How is this monitored by the BP for secondary supply in particular? How is it ensured that trained loggers are used for the procurement of fiber that eventually is purchased by the BP as secondary fiber? How can planned conversion be identified across secondary supply areas to prevent sourcing from those areas? 2.1.3: It is not clear how the option to not source fiber from areas where conversion to non-native species or plantations or non-forest use occur is exercised in the case of secondary feedstock. Criterion 2.2.1: It is not clear how impacts are assessed, and plans are in place to minimize and monitor impacts, especially regarding secondary supply. BMP implementation monitoring, and supply contracts are appropriate means of verification, but the control systems fall short of describing what is done to monitor and confirm that impacts are minimized. High levels of logger training are stated as findings, but no evidence presented to show that trained loggers are used throughout the supply base. Furthermore, it is not clear for this criterion and criteria 2.2.3 and 2.2.4 if the information provided in the HCV information packet informs harvesting activities also for forest sites where feedstock originates which is later sourced as secondary by the BP. Criteria 2.2.3 and 2.2.4: The implementation of BMPs does not necessarily ensure the protection of all high conservation values and biodiversity, as BMPs have a clear focus on soils and aquatic habitats. The organization cites rules and regulations but does not give further information how this informs their control systems and procedures as there is no data on enforcement rates given besides the corruption perception index. Furthermore, “widespread modern</p>	

forestry practices” are cited as findings; however, no evidence is presented to show how these contribute to effectively concluding low risk for this criterion. This does not support a low risk conclusion.	
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:	Click or tap here to enter description provided by Company to close the NC.
Findings for Evaluation of Evidence:	Click or tap here to enter findings for evaluation of evidence by the auditor.
NC Status:	Open

NC number 3	NC Grading: Observation
Standard & Requirement:	SBP Standard 1, 2.7 Criteria 2.2.2; SBP Standard 2, 11.7
Description of Non-conformance and Related Evidence:	
The evidence and MoV used are adequate to support a low risk conclusion; however, the BP could benefit from regional publicly available data on the protection of soil and quantitative data on the percentage of trained loggers in the supply base. Furthermore, the findings section could be clearer by separating it into certified and uncertified sources, as SFI requirements do not always apply to secondary supply.	
Timeline for Conformance:	Other NA
Evidence Provided by Company to close NC:	Click or tap here to enter description provided by Company to close the NC.
Findings for Evaluation of Evidence:	Click or tap here to enter findings for evaluation of evidence by the auditor.
NC Status:	Open

NC number 4	NC Grading: Minor
Standard & Requirement:	SBP Standard 2 Instruction Note 2C, 4.1
Description of Non-conformance and Related Evidence:	
In section 9 of the SBR, the organization states that “...Westervelt Standard Operating Procedures (SOPs) addressing sustainability and legality have been functioning for many years...”. In the SBR Annex I Exhibit B section “Florida Panhandle Critical Biodiversity Area” the organization states several times that mitigation measures are used to conclude low risk. As reported in the SBR, the organization has determined low risk for all criteria before any supplier verification program or mitigation measures. The usage of the term mitigation measures is misleading here, as a designation as specified risk precludes any mitigation measure as laid out by SBP standard 2. It should be clearly stated what measures are implemented as mitigation measures to mitigate a specified risk designation and which measures are already in place at the time of gathering information for the risk assessment and a conclusion of low 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:	Click or tap here to enter description provided by Company to close the NC.
Findings for Evaluation of Evidence:	Click or tap here to enter findings for evaluation of evidence by the auditor.
NC Status:	Open

NC number 5	NC Grading: Minor
Standard & Requirement:	SBP Standard 1, 2.7 Criteria 2.8.1; SBP Standard 2, 11.7
Description of Non-conformance and Related Evidence:	
<p>The organization cites strong evidence for a low risk conclusion of this indicator regarding the sourcing of primary material. However, the low risk designation for secondary feedstock across the entire supply base is not sufficiently laid out. As evidence, common and widespread modern forestry practices of the entire supply area logger training through the Sustainable Forestry Initiative® program are cited. This does not constitute evidence as it is not shown that this applies across the supply base, since SFI certification does not cover the entire supply base. The organization cites government websites as evidence which could constitute publicly available data from a credible third party to support the low risk conclusion, but no analysis is made as to how the information on these websites supports a low risk conclusion for harvesting activities relating to the source forests of secondary feedstock.</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:	Click or tap here to enter description provided by Company to close the NC.
Findings for Evaluation of Evidence:	Click or tap here to enter findings for evaluation of evidence by the auditor.
NC Status:	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>	22/Jun/2018
<b>Other comments:</b>	<a href="#">Click or tap here to enter text.</a>