

SBP

Sustainable Biomass Partnership

Supply Base Report: Georgia Biomass, LLC

First Surveillance Audit

www.sustainablebiomasspartnership.org



Completed in accordance with the Supply Base Report Template Version 1.2

For further information on the SBP Framework and to view the full set of documentation see www.sustainablebiomasspartnership.org

Document history

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1 Overview

Producer name: Georgia Biomass, LLC
Producer location: 3390 Industrial Boulevard, Waycross, GA 31503
Geographic position: 82°24'42.38" W / 31°15'22.80" N
Primary contact: Barry Parrish, 3390 Industrial Boulevard, Waycross, GA 31503,
 (912) 490-5293, Barry.Parrish@gabiomass.com
Company website: www.gabiomass.com
Date report finalised: 08/Aug/2016
Close of last CB audit: 04/Aug/2016. Waycross, Georgia USA
Name of CB: NSF International
Translations from English: NA
SBP Standard(s) used: Standard 1 version 1.0, Standard 2 version 1.0, Standard 4 version 1.0, and
 Standard 5 version 1.0
Weblink to Standard(s) used: <http://www.sustainablebiomasspartnership.org/documents>
SBP Endorsed Regional Risk Assessment: Not applicable
Weblink to SBE on Company website: www.gabiomass.com

Indicate how the current evaluation fits within the cycle of Supply Base Evaluations				
Main (Initial) Evaluation	First Surveillance	Second Surveillance	Third Surveillance	Fourth Surveillance
<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2 Description of the Supply Base

2.1 General description

Georgia Biomass, LLC (GBLLC) purchases softwood and hardwood wood fiber from 128 counties: five in Alabama, 38 in Florida and 85 in Georgia within the United States. Forests are the predominant land use in this supply base (68%) Pine forests comprise the largest forest type (51%) of the supply area's forest followed by hardwood forests (37%). The pine/oak forest comprises 10% of the supply area's forest type while about 2% of the forest is considered non-stocked. About 59% of the supply area's forests are managed as natural forests (3.16 MM hectares) while the remaining 41% of the supply area's forests are artificially regenerated (2.17 MM hectares).

GBLLC purchases its fiber primarily from private landowners. Small landowners provide 60% of the fiber furnish while large private landowners provide the remaining 40%. No fiber originates from public lands.

The forest products industry is a very large part of the area's economy and is one of the top industries within both states generating \$16.9 billion in GA and \$14.5 billion in FL annually. In GA there are 12 pulp/paper manufacturing facilities and 10 bioenergy facilities within the state providing 48,740 jobs. In 2014, the bioenergy industry provided 672 jobs in Georgia. In FL there are 67 wood products facilities and 6 pulp/paper manufacturing facilities within the state. The GBLLC pellet mill is one of the largest in the United States.

As previously stated, pine forests dominate the majority of the forests within the supply area. Primary species for these pine forests include loblolly pine (*Pinus taeda*), slash pine (*Pinus elliotii*) and longleaf pine (*Pinus palustris*). Primary species for the hardwood forests include oak (*Quercus* spp), sweetgum (*Liquidambar styraciflua*), maple (*Acer* spp), sycamore (*Platanus occidentalis*) and blackgum (*Nyssa sylvatica*). No species purchased at the GBLLC facility is listed on the CITES list. Longleaf pine was recently added to the IUCN Red List.

Pine forests are typically managed on an even-aged basis with a rotation age of 25 to 30 years. During this rotation the pine stand may be thinned one or two times during the middle of the rotation with a final harvest completing the rotation. Most pine forests are artificially regenerated with pine seedlings planted by hand to defined stand densities. Chemical and/or mechanical site preparation is typically used to manage the less desirable hardwood species and herbaceous species at stand establishment. Chemical treatments are minimal or below label rates; do not kill all competing species and last about two years so the pine seedlings can become established. Fertilizers are not normally applied to these forests due to costs. Some private investment groups (REITS, TIMOs) may apply fertilizers on forests which are more intensively managed.

These intensively managed pine forests represent a very small percentage of the overall pine forests in the supply basin.

Hardwood forests can be managed either as even-aged or uneven-aged stands. Most hardwood stands are 40 to 50 years when harvested if managed as an even-aged stand. No site preparation or fertilizers are used on hardwood forests.

The vast majority of forests in the GBLLC supply area are managed according to state forestry best management practices (BMPs). While these BMPs are normally voluntary, all GBLLC suppliers are contractually required to abide by them. Supplier compliance with state BMPs is verified by periodic audits conducted by GBLLC. GBLLC's Sustainable Forestry Initiative (SFI) fiber sourcing certification and procedures require all harvesting professionals to maintain continuing education training on BMPs and other sustainable forestry issues such as wildlife habitats and biodiversity and aesthetics. Overall BMP compliance reported for 2013 was 89.9% (GA) and 98.9% (FL).

Sustainable forestry certification is present in GBLLC's supply with the company purchasing 36% of its fiber as certified (SFI – 20% and ATF – 16%). No FSC certified fiber has been purchased to date.

GBLLC purchases pine and hardwood roundwood as its primary feedstock from about 83 wood suppliers. Secondary feedstock is received in the form of pine and hardwood residual chips from about 8 sawmill suppliers. Pine roundwood accounts for 84% of the total feedstock. Hardwood chips and roundwood account for less than 7% of the total feedstock. Roundwood comes from small forest landowners (50%) and large forest landowners (50%). No roundwood comes from publically owned sources.

2.2 Actions taken to promote certification amongst feedstock supplier

GBLLC is certified to the SFI Standard (NSF-SFIS-C025114-SFI) as well as the FSC (SCS-COC-005306), SFI (NSF-SFICOC-C0251114-CC1) and PEFC (NSF-PEFCCOC-C0251114-PE1) Chain of Custody

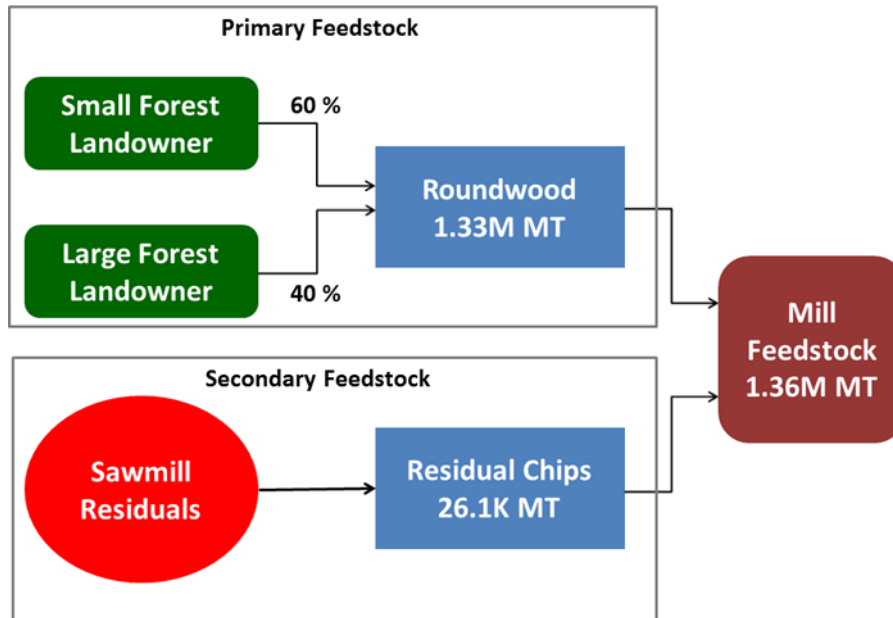
Standards. As part of GBLLC's SFI compliance program, the company promotes SFI and American Tree Farm certification. In addition GBLLC requires logging operations to be conducted by loggers trained in accordance with the state training program as conducted by the SFI state implementation committee.

2.3 Final harvest sampling programme

GBLLC, through its SFI Sourcing system, samples at least 10% or a minimum of twenty (20) harvesting sites of all forest tracts from which its primary feedstock originates. This procedure is described in the company's SFI Fiber Sourcing Procedures (GBLLC-PROC-002, Section 2.2.1). GBLLC Fiber Procurement personnel documents the type of harvest, location of harvest, BMP compliance, etc. on the Tract Inspection Form (GBLLC-DOC-016) to record this sample data.

During 2015 approximately 69% of GBLLC's roundwood came from final fellings. The other 31% originated from thinnings. The typical rotation age of final fellings in the region is approximately 25 years.

2.4 Flow diagram of feedstock inputs showing feedstock type [optional]



2.5 Quantification of the Supply Base

Supply Base

- a. Total Supply Base area (ha): 5,878,843 ha (Forested lands)
- b. Tenure by type (ha): Privately owned (5,243,750 ha) / Public 635,092 ha)
- c. Forest by type (ha): Temperate (5,878,843 ha)
- d. Forest by management type (ha): Plantation (2,130,885 ha) / Managed Natural (3,624,083 ha) / Natural (136,183 ha)
- e. Certified forest by scheme (ha): SFI (2,931,384 ha - total) (GA – 957,162 ha) (FL – 760,642 ha) SFI (AL – 1,191,750 ha) ATF (GA state-wide 778,695 ha) / ATF (FL state-wide 385,487 ha) ATF (AL state-wide 1,117,865 ha)

Feedstock

- f. Total volume of Feedstock: >1,000,000 tonnes
- g. Volume of primary feedstock: >1,000,000 tonnes
- h. List percentage of primary feedstock (g), by the following categories.
 - Certified to an SBP-approved Forest Management Scheme – 36% (SFI & ATFS)
 - Not certified to an SBP-approved Forest Management Scheme – 64%
- i. List all species in primary feedstock, including scientific name

<p>Primary Species:</p> <p>Loblolly Pine (<i>Pinus taeda</i>)</p> <p>Longleaf Pine (<i>Pinus palustris</i>)</p> <p>Slash Pine (<i>Pinus elliotii</i>)</p> <p>Miscellaneous Species:</p> <p>Pond Pine (<i>Pinus serotina</i>)</p> <p>Sand Pine (<i>Pinus clausa</i>)</p> <p>American beech (<i>Fagus grandifolia</i>)</p> <p>Ash (<i>Fraxinus spp</i>)</p> <p>Basswood, American (<i>Tilia americana</i>)</p> <p>Black cherry (<i>Prunus serotina</i>)</p> <p>Black walnut (<i>Juglans nigra</i>)</p> <p>Blackgum (<i>Nyssa sylvatica</i>)</p> <p>Boxelder (<i>Acer negundo</i>)</p> <p>Buckeye (<i>Aesculus spp</i>)</p> <p>Eastern cottonwood (<i>Populus deltoides</i>)</p> <p>Elm (<i>Ulmus spp</i>)</p> <p>Hackberry (<i>Celtis occidentalis</i>)</p>	<p>Miscellaneous Species (con't):</p> <p>Hickory (<i>Carya spp</i>) Locust (<i>Robinia spp</i>) Maple (<i>Acer spp</i>)</p> <p>Oak (<i>Quercus spp</i>)</p> <p>Persimmon (<i>Diospyros virginiana</i>) Red maple (<i>Acer rubrum</i>)</p> <p>Red mulberry (<i>Morus rubra</i>)</p> <p>Red oak (<i>Quercus rubra</i>)</p> <p>River birch (<i>Betula nigra</i>)</p> <p>Sassafras (<i>Sassafras albidum</i>)</p> <p>Sourwood (<i>Oxydendrum arboreum</i>)</p> <p>Sugarberry (<i>Celtis laevigata</i>)</p> <p>Sweetgum (<i>Liquidambar styraciflua</i>) Sycamore (<i>Platanus occidentalis</i>) Water oak (<i>Quercus nigra</i>)</p> <p>White oak (<i>Quercus alba</i>)</p> <p>Yellow-poplar (<i>Liriodendron tulipifera</i>)</p>
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- j. Volume of primary feedstock from primary forest - None
- k. List percentage of primary feedstock from primary forest (j), by the following categories. Subdivide by SBP-approved Forest Management Schemes:
 - Primary feedstock from primary forest certified to an SBP-approved Forest Management Scheme - None
 - Primary feedstock from primary forest not certified to an SBP-approved Forest Management Scheme - None
- l. Volume of secondary feedstock:
 - Pine Sawmill Chips - 0 – 19%
 - Pine Sawmill Sawdust – 0 – 19%
 - Pine Sawmill Shavings – 0 – 19%
- m. Volume of tertiary feedstock: None
 - Banding is used for feedstock volumes because disclosure of the exact figure would reveal commercially sensitive information that could be used by competitors to gain competitive advantage. Feedstock information is commercially sensitive and must be kept confidential due to the close proximity of competitors in the supply base and the strong competition for the feedstock. Increased information in the marketplace would only increase the competition, and may give competitors not bound by similar standards a competitive advantage.

3 Requirement for a Supply Base Evaluation

SBE completed	SBE not completed
X	<input type="checkbox"/>

SBE was completed so that all material can be SBP compliant in accordance with SBP Standard 4, 5.2.2.

4 Supply Base Evaluation

4.1 Scope

The scope of the supply base evaluation of Georgia Biomass LLC is to confirm all indicators of Criteria 1 & 2 of SBP Framework Standard 1: Feedstock Compliance Standard are considered low risk within the defined supply base.

4.2 Justification

The evaluation assessed each of the indicators within Criteria 1 & 2 of SBP Framework Standard 1: Feedstock Compliance to determine if there is a low risk associated with each indicator. This assessment reviewed applicable laws and regulations and forestry best management practices, analysed high conservation areas within the supply base for their rareness and level of protection and assessed the economic impact of the company's presence in the supply base.

This review and analysis was completed using stated laws and regulations, published forestry best management practices, recognized research and data from the USDA Forest Service and conservation organizations such as the World Wildlife Fund, NatureServe, state forestry and wildlife agencies and other noted experts

4.3 Results of Risk Assessment

The results of the risk assessment indicate there is low risk to all indicators within Criteria 1 & 2 of SBP Framework Standard 1: Feedstock Compliance. No additional supplier assessment programs were identified as needed

4.4 Results of Supplier Verification Programme

Not applicable; the results of the risk assessment indicate there is low risk to all indicators within Criteria 1 & 2 of SBP Framework Standard 1: Feedstock Compliance.

4.5 Conclusion

Based on the results of the supply base evaluation there is low risk to all indicators within Criteria 1 & 2 of SBP Framework Standard 1: Feedstock Compliance. This conclusion is based on the strong legal and regulatory system found within the supply base. Federal, state and local laws regulations are in place to address a wide range of indicators including, but not limited to, illegal harvesting, water quality, rare and endangered species, worker health and safety, labour rights and air quality. In addition to these laws and regulations, voluntary state forestry best management practices (BMPs) are in place to provide guidance to forest landowners and contractors on how to sustainably manage forests. The company has made these voluntary guidelines mandatory through contract language requiring the use of all BMPs.

Analysis using USDA Forest Service data clearly shows the supply area's forests are growing more fiber and carbon stock than is being harvested. This data along with economic impact studies indicate this company is a key part of the area's economy providing employment opportunities at the manufacturing site as well as throughout the supply area.

5 Supply Base Evaluation Process

The Supply Base Evaluation was completed in partnership with Greener Options Inc., a sustainability consulting company specializing in sustainable forest certification and Biological Integrity LLC, a consulting company specializing in conservation and biodiversity. The competencies of Greener Options Inc. and Biological Integrity LLC are further referenced in Section 11 of this report. The supply base was determined based on primary and secondary feedstock suppliers to ensure the complete geography of the supply area. USDA Forest Service data based on this established supply base was used to verify forest growth and harvest levels, forest ownership and overall forest composition (species, age, stand structure). Ecosystem and biodiversity data from WWF, NatureServe and the various state natural heritage programs from within the supply base was also reviewed to determine potential high conservation value (HCV) areas and the level of protection for these HCVs.

Forest management regimes for the supply base were determined from information gathered from local forestry professionals and contractors within the region. Regional economic and forest health information was gathered from state forestry agencies and forestry associations.

Georgia Biomass LLC requires the use of best management practices (BMPs), adherence to all laws and regulations and harvesting professional training as part of its contract with feedstock suppliers. The company also uses two field verification systems for its primary and secondary feedstocks. Primary feedstock suppliers are verified at the forest level through the company's Sustainable Forestry Initiative (SFI) Fiber Sourcing certification program where company personnel and contractors conduct field inspections of a minimum of 10% of harvest sites for BMPs, harvesting professionals training and traceability. Secondary feedstock suppliers are visited at least annually to confirm their supply base and the species they purchase for their operations.

6 Stakeholder Consultation

A list of twenty seven (27) local and regional stakeholders was identified for consultation. These stakeholders represent interests from local contractors and businesses, local governments, state forestry and wildlife agencies, conservation organizations such as the Nature Conservancy, state forestry associations, local forest landowner associations, US Forest Service and US Fish & Wildlife Service. No recognized indigenous peoples groups have been identified within the supply area.

A letter was sent to the identified stakeholders notifying them the intent of Georgia Biomass LLC to become SBP certified and asking for input on their thoughts on Georgia Biomass's business practices and their impact on sustainable forestry in their area. Feedback was requested during the certification process via letter, email and/or telephone. All feedback will be reviewed and responses will be provided.

6.1 Response to stakeholder comments

Responses were received from three of the twenty seven stakeholders contacted. Feedback and responses are listed below:

1. University of Georgia

Daniel B. Warnell School of Forestry and Natural Resources

Dr. W. Dale Greene - Dean

Positive comments reaffirming GBLLC's commitment to sustainable forestry practices and the value additional markets provide to sustainable forestry.

No action necessary

2. Georgia Forestry Commission

Robert Farris – State Forester

Positive comments referencing positive growth/drain ration and GBLLC track record of forest stewardship

No action necessary

3. United States Department of the Interior

Fish and Wildlife Service

Strant Colwell – Coastal Georgia Supervisor

Positive comments indicating bioenergy industry can be expanded in Georgia without threatening sustainability of forest resources. Suggested GBLLC could have a positive impact on sustainable forestry by supporting management techniques that are "friendly" to the environment such as those to protect the gopher tortoise. As a result of this suggestion, GBLLC will place the brochure "Forest Management

Practices to Enhance Habitat for the Gopher Tortoise" in Landowner Outreach Packets mailed to landowners in promotion of sustainable forestry. GBLLC will also give the brochure to loggers when inspecting active logging sites.

7 Overview of Initial Assessment of Risk

Table 1. Overview of results from the risk assessment of all Indicators (prior to SVP)

Indicator	Initial Risk Rating		
	Specified	Low	Unspecified
1.1.1		X	
1.1.2		X	
1.1.3		X	
1.2.1		X	
1.3.1		X	
1.4.1		X	
1.5.1		X	
1.6.1		X	
2.1.1		X	
2.1.2		X	
2.1.3		X	
2.2.1		X	
2.2.2		X	
2.2.3		X	
2.2.4		X	
2.2.5		X	
2.2.6		X	
2.2.7		X	
2.2.8		X	
2.2.9		X	

Indicator	Initial Risk Rating		
	Specified	Low	Unspecified
2.3.1		X	
2.3.2		X	
2.3.3		X	
2.4.1		X	
2.4.2		X	
2.4.3		X	
2.5.1		X	
2.5.2		X	
2.6.1		X	
2.7.1		X	
2.7.2		X	
2.7.3		X	
2.7.4		X	
2.7.5		X	
2.8.1		X	
2.9.1		X	
2.9.2		X	
2.10.1		X	

8 Supplier Verification Programme

8.1 Description of the Supplier Verification Programme

Not applicable; all indicators of the initial risk assessment were determined to be low risk so no Supplier Verification Programme is required.

8.2 Site visits

Not applicable; all indicators were determined to be low risk.

8.3 Conclusions from the Supplier Verification Programme

Not applicable; all indicators of the initial risk assessment were determined to be low risk so no Supplier Verification Programme is required.

9 Mitigation Measures

9.1 Mitigation measures

Not applicable; all indicators of the initial risk assessment were determined to be low risk so no mitigation measures are required.

9.2 Monitoring and outcomes

Not applicable; all indicators of the initial risk assessment were determined to be low risk so no mitigation measures are required.

10 Detailed Findings for Indicators

Detailed findings for each Indicator are given in Annex 1.

11 Review of Report

11.1 Peer review

This Supply Base Report was reviewed, either in total or partially, by the following individuals outside of the GBLLC organization:

- Gary Boyd – Greener options Inc.
Gary Boyd is the owner of Greener Options Inc., a sustainability consulting firm that specializes in sustainable forestry certification. He has 30+ years of work experience in the forest products industry including forest management, fiber procurement, wildlife & biodiversity management and environmental management systems. Boyd working in the forest products industry helped develop corporate sustainable forestry certification systems in the mid-1990's. He also represented his company in a number of industry led committees in developing the Sustainable Forestry Initiative (SFI).

In addition to consulting, Boyd is an accredited ISO 14001 Lead Auditor with two different certification bodies where he conducts forest management, fiber procurement, and chain of custody audits to the various recognized sustainable forestry standards. He has conducted over 370 audits to date.

- Mark Hughes, PhD – Biological Integrity LLC
Dr. Mark Hughes is the owner of Biological Integrity LLC, a consulting firm specializing in ecosystem and wildlife management. He has 30 years of work experience in studying and researching the taxonomy and ecology of aquatic and terrestrial species. Dr. Hughes has completed numerous risk assessments for clients who are achieving FSC forest management / chain of custody, PEFC chain of custody certification and/or SBP certification.
- Norman Boatwright – NSF Lead Auditor

11.2 Public or additional reviews

Not applicable.

12 Approval of Report

Approval of Supply Base Report by senior management			
Report Prepared by:	<i>Barry Parrish</i>	<i>Fiber Procurement and Sustainability Manager</i>	<i>8/5/16</i>
	Name	Title	Date
The undersigned persons confirm that I/we are members of the organisation’s senior management and do hereby affirm that the contents of this evaluation report were duly acknowledged by senior management as being accurate prior to approval and finalisation of the report.			
Report approved by:	<i>James E. Roecker</i>	<i>Chief Executive Officer</i>	<i>8/8/16</i>
	Name	Title	Date
Report approved by:	<i>Mark W. Gaddy</i>	<i>VP Operations/Site Manager</i>	<i>8/8/16</i>
	Name	Title	Date
Report approved by:	<i>[name]</i>	<i>[title]</i>	<i>[date]</i>
	Name	Title	Date

13 Updates

13.1 Significant changes in the Supply Base

With the increased use of secondary feedstock, GBLLC's Supply Base increased from 68 counties in Georgia and Florida to 128 counties: five in Alabama, 38 in Florida and 85 in Georgia.

During 2015 approximately 69% of GBLLC's roundwood came from final fellings. The other 31% originated from thinnings. The typical rotation age of final fellings in the region is approximately 25 years.

Supply Base

Total Supply Base area (ha):	5,878,843 ha (Forested lands)
Tenure by type (ha):	Privately owned (5,243,750 ha) / Public 635,092 ha)
Forest by type (ha):	Temperate (5,878,843 ha)
Forest by management type (ha):	Plantation (2,130,885 ha) / Managed Natural (3,624,083 ha) / Natural (136,183 ha)
Certified forest by scheme (ha):	SFI (2,931,384 ha - total) (GA – 957,162 ha) (FL – 760,642 ha) SFI (AL – 1,191,750 ha) ATF (GA state-wide 778,695 ha) / ATF (FL state-wide 385,487 ha) ATF (AL state-wide 1,117,865 ha)

Feedstock

Total volume of Feedstock: >1,000, 000 tonnes

Volume of primary feedstock >1,000, 000 tonnes

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

- Certified to an SBP-approved Forest Management Scheme – 36% (SFI & ATFS)
- Not certified to an SBP-approved Forest Management Scheme – 64%

13.2 Effectiveness of previous mitigation measures

Not applicable; all indicators of the risk assessment were determined to be low risk so no mitigation measures are required.

13.3 New risk ratings and mitigation measures

Not applicable; all indicators of the risk assessment were determined to be low risk so no mitigation measures are required.

13.4 Actual figures for feedstock over the previous 12 months

Feedstock

Total volume of Feedstock: >1,000, 000 tonnes

Volume of primary feedstock>1,000, 000 tonnes

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

- Certified to an SBP-approved Forest Management Scheme – 36% (SFI & ATFS)
- Not certified to an SBP-approved Forest Management Scheme – 64%

List all species in primary feedstock, including scientific name

<p>Primary Species:</p> <p>Loblolly Pine (<i>Pinus taeda</i>)</p> <p>Longleaf Pine (<i>Pinus palustris</i>)</p> <p>Slash Pine (<i>Pinus elliotii</i>)</p> <p>Miscellaneous Species:</p> <p>Pond Pine (<i>Pinus serotina</i>)</p> <p>Sand Pine (<i>Pinus clausa</i>)</p> <p>American beech (<i>Fagus grandifolia</i>)</p> <p>Ash (<i>Fraxinus spp</i>)</p> <p>Basswood, American (<i>Tilia americana</i>)</p> <p>Black cherry (<i>Prunus serotina</i>)</p> <p>Black walnut (<i>Juglans nigra</i>)</p> <p>Blackgum (<i>Nyssa sylvatica</i>)</p> <p>Boxelder (<i>Acer negundo</i>)</p> <p>Buckeye (<i>Aesculus spp</i>)</p> <p>Eastern cottonwood (<i>Populus deltoides</i>)</p> <p>Elm (<i>Ulmus spp</i>)</p> <p>Hackberry (<i>Celtis occidentalis</i>)</p>	<p>Miscellaneous Species (con't):</p> <p>Hickory (<i>Carya spp</i>)Locust (<i>Robinia spp</i>)</p> <p>Maple (<i>Acer spp</i>)</p> <p>Oak (<i>Quercus spp</i>)</p> <p>Persimmon (<i>Diospyros virginiana</i>)</p> <p>Red maple (<i>Acer rubrum</i>)</p> <p>Red mulberry (<i>Morus rubra</i>)</p> <p>Red oak (<i>Quercus rubra</i>)</p> <p>River birch (<i>Betula nigra</i>)</p> <p>Sassafras (<i>Sassafras albidum</i>)</p> <p>Sourwood (<i>Oxydendrum arboreum</i>)</p> <p>Sugarberry (<i>Celtis laevigata</i>)</p> <p>Sweetgum (<i>Liquidambar styraciflua</i>)</p> <p>Sycamore (<i>Platanus occidentalis</i>)</p> <p>Water oak (<i>Quercus nigra</i>)</p> <p>White oak (<i>Quercus alba</i>)</p> <p>Yellow-poplar (<i>Liriodendron tulipifera</i>)</p>
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Volume of primary feedstock from primary forest - None

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

Subdivide by SBP-approved Forest Management Schemes:

- Primary feedstock from primary forest certified to an SBP-approved Forest Management Scheme – None
- Primary feedstock from primary forest not certified to an SBP-approved Forest Management Scheme - None

Volume of secondary feedstock:

- Pine Sawmill Chips - 0 – 19%
- Pine Sawmill Sawdust – 0 – 19%
- Pine Sawmill Shavings – 0 – 19%

Volume of tertiary feedstock: None

- Banding is used for feedstock volumes because disclosure of the exact figure would reveal commercially sensitive information that could be used by competitors to gain competitive advantage. Feedstock information is commercially sensitive and must be kept confidential due to the close proximity of competitors in the supply base and the strong competition for the feedstock. Increased information in the marketplace would only increase the competition, and may give competitors not bound by similar standards a competitive advantage.

13.5 Projected figures for feedstock over the next 12 months

Feedstock

Total volume of Feedstock: >1,000, 000 tonnes

Volume of primary feedstock>1,000, 000 tonnes

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

- Certified to an SBP-approved Forest Management Scheme – 36% (SFI & ATFS)
- Not certified to an SBP-approved Forest Management Scheme – 64%

List all species in primary feedstock, including scientific name

<p>Primary Species:</p> <ul style="list-style-type: none"> Loblolly Pine (<i>Pinus taeda</i>) Longleaf Pine (<i>Pinus palustris</i>) Slash Pine (<i>Pinus elliotii</i>) <p>Miscellaneous Species:</p> <ul style="list-style-type: none"> Pond Pine (<i>Pinus serotina</i>) Sand Pine (<i>Pinus clausa</i>) American beech (<i>Fagus grandifolia</i>) Ash (<i>Fraxinus spp</i>) Basswood, American (<i>Tilia americana</i>) Black cherry (<i>Prunus serotina</i>) Black walnut (<i>Juglans nigra</i>) Blackgum (<i>Nyssa sylvatica</i>) Boxelder (<i>Acer negundo</i>) Buckeye (<i>Aesculus spp</i>) 	<p>Miscellaneous Species (con't):</p> <ul style="list-style-type: none"> Hickory (<i>Carya spp</i>)Locust (<i>Robinia spp</i>) Maple (<i>Acer spp</i>) Oak (<i>Quercus spp</i>) Persimmon (<i>Diospyros virginiana</i>) Red maple (<i>Acer rubrum</i>) Red mulberry (<i>Morus rubra</i>) Red oak (<i>Quercus rubra</i>) River birch (<i>Betula nigra</i>) Sassafras (<i>Sassafras albidum</i>) Sourwood (<i>Oxydendrum arboreum</i>) Sugarberry (<i>Celtis laevigata</i>) Sweetgum (<i>Liquidambar styraciflua</i>) Sycamore (<i>Platanus occidentalis</i>)
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Eastern cottonwood (<i>Populus deltoides</i>)	Water oak (<i>Quercus nigra</i>)
Elm (<i>Ulmus spp</i>)	White oak (<i>Quercus alba</i>)
Hackberry (<i>Celtis occidentalis</i>)	Yellow-poplar (<i>Liriodendron tulipifera</i>)

Volume of primary feedstock from primary forest - None

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

Subdivide by SBP-approved Forest Management Schemes:

- Primary feedstock from primary forest certified to an SBP-approved Forest Management Scheme – None
- Primary feedstock from primary forest not certified to an SBP-approved Forest Management Scheme - None

Volume of secondary feedstock:

Pine Sawmill Chips - 0 – 19%

Pine Sawmill Sawdust – 0 – 19%

Pine Sawmill Shavings – 0 – 19%

Volume of tertiary feedstock: None

- Banding is used for feedstock volumes because disclosure of the exact figure would reveal commercially sensitive information that could be used by competitors to gain competitive advantage. Feedstock information is commercially sensitive and must be kept confidential due to the close proximity of competitors in the supply base and the strong competition for the feedstock. Increased information in the marketplace would only increase the competition, and may give competitors not bound by similar standards a competitive advantage.

Annex 1: Detailed Findings for Supply Base Evaluation Indicators

Note: Due to increasing the number of residual material suppliers the supply basin was increased from 68 counties in Georgia and Florida to 128 counties: five in Alabama, 38 in Florida and 85 in Georgia.

	Indicator
1.1.1	The Biomass Producer's Supply Base is defined and mapped.
Finding	Company's Supply Base is defined and mapped. The map is defined by the present and projected future needs of the plant and includes identified secondary feedstock suppliers.
Means of Verification	Map of supply basin and list of counties.
Evidence Reviewed	GBLLC-DOC-018 FSC Controlled Wood / PEFC Due Diligence Risk Assessments define the supply base by use of a map and a list of states and counties within those states where wood fiber originates.
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
1.1.2	Feedstock can be traced back to the defined Supply Base.
Finding	Primary feedstock can be traced back to the defined Supply Base through scale ticket documentation and Log Inventory and Management System (LIMS) records where each authorization card & scale ticket defines the county and state that feedstock originates. Secondary feedstock can be traced to the sawmill location from which the residual chips were produced. Fiber contracts document the location of these sawmills. Communications with secondary feedstock suppliers confirms feedstock originates from within the GBLLC supply base and is recorded using the secondary supplier audit checklist. Traceability is enforced by Company policies and procedures.
Means of Verification	Company procedures, records in wood inventory system and communications with suppliers
Evidence Reviewed	<ol style="list-style-type: none"> 1. Chain of Custody Procedures (GBLLC-PROC-001) 2. FSC Controlled Wood & PEFC Due Diligence System Procedures (GBLLC-PROC-003) 3. SFI Fiber Sourcing Procedures (GBLLC-PROC-002) 4. Counties from which primary feedstock originates are recorded in LIMS and crosschecked with table in FSC Controlled Wood/PEFC Due Diligence Risk Assessment (GBLLC-DOC-018, Table 1). 5. Secondary feedstock supplier county lists are verified with the suppliers annually using the Secondary Supplier Audit Checklist (GBLLC-DOC-015).
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator		
1.1.3	The feedstock input profile is described and categorised by the mix of inputs.		
Finding	The feedstock input profile is described and categorised by the mix of inputs.		
	2015 Feedstock Input Profile (tonnes)		
	Primary	Pine Roundwood	1,227,192.19
		Hdwd Roundwood	18,006.74
		Pine In-Woods Chips	6,711.05
		Hdwd In-Woods Chips	72,595.35
	Total Primary Feedstock		1,324,505.33
	Secondary	Pine Residual Chips	10,265.56
		Pine Sawdust	120,647.02
		Pine Shavings	25,547.80
		Hardwood Sawdust	409.14
	Total Secondary Feedstock		156869.59
	Total Feedstock		1,481,374.85
Means of Verification	Verify 2015 wood purchases in LIMS.		
Evidence Reviewed	2015 wood purchases		
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA		

	Indicator
1.2.1	The Biomass Producer has implemented appropriate control systems and procedures to ensure that legality of ownership and land use can be demonstrated for the Supply Base.
Finding	There are appropriate control systems and procedures to ensure that legality of ownership and land use can be demonstrated for the Supply Base. Illegal harvesting in the supply base is prohibited by state laws. In most states the timber buyers and/or harvesting companies have to be licensed in order to conduct their business. Evidence indicates that major violations are prosecuted and legal liability is enforced. There is no evidence suggesting that illegal logging is a wide scale problem in the United States (US). Commonly used terms for violations in US are timber theft, tree poaching and unlawful logging. Thefts do occur, however the share of illegal felling in hardwoods is much smaller than 1% according to a study conducted by American Hardwood Export Council. It is logical to conclude that similarly illegal logging is not a major problem for softwoods in US. Further,

	legality of ownership and land use is enforced through Company procedures and contractual agreements by suppliers.
Means of Verification	State laws, Company policy, regional risk assessment, contract provisions with suppliers.
Evidence Reviewed	<ol style="list-style-type: none"> 1. Company policy requires that all applicable laws and regulations are followed (GBLLC-POL-001) 2. Chain of Custody Procedures requires legal ownership of feedstock received (GBLLC-PROC-001) 3. FSC Controlled Wood / PEFC Due Diligence Risk Assessment (GBLLC-DOC-018) states illegal harvesting of feedstock is LOW risk. 4. Delivered Fiber and Logging & Hauling Agreements have clauses concerning the legality of ownership of the feedstock to be purchased. 5. State laws addressing illegal logging and wood theft are as follows: <u>Georgia Laws</u> House Bill - HB 790 (A BILL TO BE ENTITLED AN ACT) Signed by Governor: April 29, 2014 Effective Date: July 1, 2014 Provides additional enforcement authority to Georgia Forestry Commission investigators In cases involving the unauthorized cutting or cutting and carrying away of timber from the property of another damages shall be awarded in accordance with GA. CODE ANN. § 51-12-50. Amends GA. CODE ANN. § 51-12-50 whereas damages shall be: (1) Treble the fair market value of the trees cut as they stood; (2) Treble the diminished fair market value of any trees incidentally harmed; (3) Costs of reasonable reforestation activities related to the plaintiff's injury; and (4) Attorney fees and expenses of litigation. When defendant is a willful trespasser, plaintiff may receive punitive damages. Amends GA. CODE ANN. § 12-6-23 relating to wood load ticket required for wood removal, so as to require purchasers to provide the proper tickets to sellers of timber within 20 days GA Codes Title 12 Forest Resources and other Plant Life Article 1 – Forestry Resources GA. CODE § 12-6-23 - Wood load ticket required for wood removal; form; exceptions GA. CODE § 12-6-24 - Notice of timber harvesting operations - See more at: http://statutes.laws.com/georgia/title-12/chapter-6/article-1/part-1a#sthash.J9TcZrl6.dpuf County Laws in Georgia can be found online at: http://warnell.forestry.uga.edu/warnell/service/library/index.php3?docID=272&docHistory[]=1 <u>1</u> <u>Florida Laws</u> Title XXXIII Regulation of Trade, Commerce, Investments, and Solicitations Chapter 536 Timber and Lumber § 536.13 Stamp or brand for logs.

	<p>Any person engaged in this state in the business of getting out, buying, selling, or manufacturing saw logs, may adopt a stamp or brand for...</p> <p>§ 536.14 Brands to be recorded by clerk of circuit court.</p> <p>A person may execute a written declaration that she or he has adopted a brand, describing it, and after acknowledgment of such declaration before any...</p> <p>§ 536.15 May prevent use by others.</p> <p>Any person who has had her or his brand recorded in any county, may prevent other persons from using the same in said county by...</p> <p>§ 536.16 Prima facie evidence of ownership.</p> <p>Any log found in any county branded with a brand recorded in said county by any person shall be deemed prima facie to be the...</p> <p>§ 536.17 Where two or more brands the same.</p> <p>In case there shall be recorded in the same county two or more brands the same, or substantially the same, the brand first recorded shall...</p> <p>§ 536.18 Defacing the mark or brand of lumber and timber.</p> <p>If any person shall fraudulently alter, change or deface the duly recorded mark, brand, or stamp of any lumber, logs or timber, or shall fraudulently...</p> <p>§ 536.19 Unlawful use of recorded log brand or stamp.</p> <p>Any person who shall unlawfully use any recorded log brand or stamp of another shall be guilty of a misdemeanor of the second degree, punishable...</p>
<p>Risk Rating</p>	<p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>

	Indicator
1.3.1	The BP has implemented appropriate control systems and procedures to ensure that feedstock is legally harvested and supplied and is in compliance with EUTR legality requirements.
Finding	There are appropriate control systems and procedures to ensure that legality of ownership and land use can be demonstrated for the Supply Base. Illegal harvesting in the supply base is prohibited by state laws. In most states the timber buyers and/or harvesting companies have to be licensed in order to conduct their business. Evidence indicates that major violations are prosecuted and legal liability is enforced. There is no evidence suggesting that illegal logging is a wide scale problem in the United States (US). Commonly used terms for violations in US are timber theft, tree poaching and unlawful logging. Thefts do occur, however the share of illegal felling in hardwoods is much smaller than 1% according to a study conducted by American Hardwood Export Council. It is logical to conclude that similarly illegal logging is not a major problem for softwoods in US. Further, legality of ownership and land use is enforced through Company procedures and contractual representations by suppliers.
Means of Verification	State laws, Company policy, regional risk assessment, Delivered Fiber and Logging & Hauling Agreements with suppliers.
Evidence Reviewed	<ol style="list-style-type: none"> 1. Company policy requires that all applicable laws and regulations are followed (GBLLC-POL-001) 2. Chain of Custody Procedures requires legal ownership of feedstock received (GBLLC-PROC-001) 3. FSC Controlled Wood / PEFC Due Diligence Risk Assessment (GBLLC-DOC-018) states illegal harvesting of feedstock is LOW risk. 4. Delivered Fiber and Logging & Hauling Agreements have clauses concerning the legality of ownership of the feedstock to be purchased. 5. State laws addressing illegal logging and wood theft are as described in 1.2.1 above.
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
1.4.1	The Biomass Producer has implemented appropriate control systems and procedures to verify that payments for harvest rights and timber, including duties, relevant royalties and taxes related to timber harvesting, are complete and up to date.
Finding	Company has implemented appropriate control systems and procedures to verify that payments for harvest rights and timber, including duties, relevant royalties and taxes related to timber harvesting, are complete and up to date. Severance taxes are not paid for timber in GA and FL. Delivered Fiber and Logging & Hauling Agreements stipulate that the landowner is responsible for paying taxes. GBLLC is only responsible for reporting volumes removed quarterly to the Tax Commissioner for the county of harvest.
Means of Verification	Delivered Fiber and Logging & Hauling Agreements with suppliers, quarterly tax reporting
Evidence Reviewed	1. Quarterly tax reporting to County Clerks
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
1.5.1	The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is supplied in compliance with the requirements of CITES.
Finding	Company has implemented appropriate control systems and procedures to verify that feedstock is supplied in compliance with the requirements of CITES. Based on review of the CITES list it is determined that there are no species used in Company operations that are included in the CITES list.
Means of Verification	List of species used by Company and CITES list
Evidence Reviewed	1. List of species used by Company is included in FSC Product Group Schedule (GBLLC-DOC-002). 2. CITES list appears in FSC Controlled Wood/PEFC Due Diligence Risk Assessment (GBLLC-DOC-018, Table 4).
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
1.6.1	The Biomass Producer has implemented appropriate control systems and procedures to ensure that feedstock is not sourced from areas where there are violations of traditional or civil rights.
Finding	Harvesting in the supply basin presents a low risk of violation of traditional, civil and collective rights based on the following factors: (1) There is no UN Security Council ban on timber exports from the country concerned; (2) The country or district is not designated a source of conflict timber (e.g. USAID Type 1 conflict timber); (3) There are recognized

	and equitable processes in place to resolve conflicts of substantial magnitude pertaining to traditional rights including use rights, cultural interests or traditional cultural identity in the district concerned; and (4) There is no evidence of violation of the ILO Convention 169 on Indigenous and Tribal Peoples taking place in the forest areas in the district concerned.
Means of Verification	FSC Controlled Wood/PEFC Due Diligence Risk Assessment (GBLLC-DOC-018)
Evidence Reviewed	1. FSC Controlled Wood/PEFC Due Diligence Risk Assessment (GBLLC-DOC-018)
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk at RA <input type="checkbox"/> Unspecified Risk

	Indicator
2.1.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that forests and other areas with high conservation values are identified and mapped.
Finding	<p>Forests and other areas with high conservation values are identified and mapped.</p> <p>There is one Alliance for Zero Extinction Site (AZE), two Centre for Plant Diversity (CPD) sites, one GreenPeace Intact Forest (IF), one World Wildlife Fund (WWF) Global 200 ecoregion overlapping the wood basin. However, there are protected areas with a strong protection system for each HCV in the wood basin.</p> <p>The World Wildlife Fund's Global 200 Ecoregions build a framework for describing the most important areas of biodiversity on the planet. The Global 200 encompass almost 50% of life on earth. These 200 areas are places that conservation groups target and discuss with forest products companies about the loss of global, forest biodiversity (Olson et al., 2001). http://www.worldwildlife.org/science/ecoregions/global200.html</p> <p>Almost all of the counties in the GBLLC wood basin are within a single World Wildlife Fund Global 200 Ecoregions -</p> <ul style="list-style-type: none"> • Southeastern Coniferous & Broadleaf Forests (# 75 in the WWF Global 200) <p>Most of the counties are in the Southeastern Coniferous & Broadleaf Forests which has a conservation status of endangered/critical.</p> <p>This single global 200 ecoregion intersects the wood basin. It is significant at a global scale, but this <i>global</i> ecoregion (#75) is subdivided into two smaller endangered/critical terrestrial ecoregions. These scaled-down subdivisions have significance at the national level. In the following segments, the terrestrial ecoregions are discussed.</p> <p>http://wwf.panda.org/about_our_earth/ecoregions/ecoregion_list/</p> <p>The Southeastern Coniferous & Broadleaf Forests (Global 200 # 75)</p> <ul style="list-style-type: none"> • The Southeastern mixed forests (NA0413) • The Southeastern conifer forests (NA0529) <p>The Southeastern mixed forests (NA0413) is the first of two terrestrial ecoregions found within the Global 200 ecoregion # 75. It has a conservation status of endangered/critical.</p> <p>Only four counties in the northern end of the wood basin enter this terrestrial ecoregion – Bibb, Dooly, Houston, and Twiggs counties, GA. This is a highly degraded ecoregion with more than 99% of the original habitat having been altered. This region has been converted to other uses. Settlers within the ecoregion logged and then cleared the land for agriculture. The ecoregion overlaps the Piedmont on the Atlantic Slope and the rest falls into the Coastal Plain on the Gulf Coast. WWF reports that there is little habitat left</p>

to conserve in this critical/endangered ecoregion. Even though there are few protected examples (Bond Swamp National Wildlife Refuge, Ocmulgee National Monument, Robins Air Force Base) of this ecoregion *within the wood basin*, there are many more protected areas of the ecoregion *outside of the wood basin*.

This region once contained three major types of stands: pure hardwood, pure pine, and mixed pine/hardwood stands. Fire was the driver of the pure pine stands. Once it was removed from the area, hardwood stands began to dominate the ecoregion.

The **Southeastern conifer forests (NA0529)** is the second terrestrial ecoregion that makes up the global ecoregion # 75. It has a conservation status of **endangered/critical**.

The GBLLC wood basin overlaps the northeastern portion of this ecoregion. The ecoregion, itself, extends from the Savannah River in Georgia across the coastal plain to the eastern parishes of Louisiana and south into Florida in the vicinity of Lake Okeechobee.

This ecoregion is equated with the longleaf pine ecosystem that once spanned a significant portion of the coastal plain. It was dominated by longleaf pine overstory and an exceptionally diverse array of plants in the understory and herbaceous layer. The entire region was driven by a fire driven ecology. A regular fire regime once maintained essentially a single species overstory consisting of longleaf pine. Many species of birds, reptiles, and amphibians adapted to this environment as well. The red-cockaded woodpecker, gopher tortoise, indigo snake, and flatwoods salamander are some of the more threatened, regulated, and managed of those taxa.

Fire was suppressed in this ecosystem as it was in many of the other regions in the southeast. Due to commercial and private development, conversion to agriculture, and the planting of loblolly pine in the area, the longleaf pine flatwoods have been reduced to less than 1% of its original size. However, there are several places where the natural habitat is being maintained and fire is still allowed into the systems. Most of the conservation sites that remain can be found on national forests, military bases, and state parks. Thanks to organizations like the Longleaf Alliance, private landowners are being given federal incentives to plant longleaf on their property and maintain those stands for many decades to come. As a result of education and conservation planning, there has been an increase in longleaf plantations over the past decade with an increase in newly planted acres every year within the ecoregion.

A Greenpeace Intact Forest straddling Charlton and Ware counties is within the wood basin. It is almost entirely within the 403,119 acre Okefenokee National Wildlife Refuge which has been described as “one of North America’s most unspoiled, fascinating and precious natural areas”. The Okefenokee Swamp is the largest, intact, un-fragmented, freshwater and black water wilderness swamp in North America (<http://www.okefenokee.com>). There are 353,000 acres designated as a National Wilderness Area within the refuge. Two small fingers of the Greenpeace Intact Forest extend beyond the northern end of the refuge; the rest of the intact forest is within the refuge where it receives federal protection from the Department of the Interior.

One Alliance for Zero Extinction Site (AZE), the Torreya State Park, is located within the wood basin in Liberty County, Florida. The park protects the bulk of extant occurrences of the Florida Torreya, *Torreya taxifolia* within its native range. Two additional protected areas near the park protect additional Torreya occurrences. The Florida Torreya, the target species within this AZE site, is an endemic to limestone bluffs along the Apalachicola River in Gadsden, Liberty, and Jackson counties FL as well as a few kilometers into Decatur County, GA. The Torreya is a tree. It originally comprised about 4% of the forest in this area. Its stems were used primarily for fence posts. A fungal blight destroyed the population. Its associate tree species include beech (*Fagus grandifolia*), yellow-poplar (*Liriodendron tulipifera*), American holly (*Ilex opaca*), Florida maple (*Acer barbatum*), loblolly pine (*Pinus taeda*), spruce pine (*P. glabra*), white oak (*Quercus alba*), eastern hophornbeam (*Ostrya virginiana*), and sweetgum (*Liquidambar styraciflua*). Artificial propagation of the Florida Torreya is ongoing. Cultivated individuals have survived in North Carolina for over 40 years.

Means of Verification	Figures provided in FSC Controlled Wood/PEFC Due Diligence Risk Assessment (GBLLC-DOC-018)
Evidence Reviewed	<ol style="list-style-type: none"> 1. Following figures from FSC Controlled Wood/PEFC Due Diligence Risk Assessment (GBLLC-DOC-018) <ol style="list-style-type: none"> a. Conservation International hotspots (Figure 3) b. Centres for Plant Diversity (Figure 4,5,6) c. GreenPeace Intact Forests (Figure 9) d. World Resources Institute (Global Forest Watch) Frontier Forests (Figure 10) e. Alliance for Zero Extinctions (AZE) sites (Figure 2)
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.1.2	The Biomass Producer 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.
Finding	Company Risk Assessment states there is LOW risk of working in areas with high conservation value. Company procedures state requirements of suppliers meeting state Best Management Practices (BMPs) and describes the Company’s BMP compliance program. Delivered Fiber and Logging & Hauling Agreements require that all logging operations be conducted in compliance with state BMPs. Company conducts compliance checks on suppliers to verify adherence to state BMPs.
Means of Verification	Company procedures, BMP compliance check records, Delivered Fiber and Logging & Hauling Agreements
Evidence Reviewed	<ol style="list-style-type: none"> 1. FSC Controlled Wood/PEFC Due Diligence Risk Assessment (GBLLC-DOC-018) 2. SFI Fiber Sourcing Procedures (GBLLC-PROC-002) 3. BMP Compliance records – Tract Inspection Form (GBLLC-DOC-016) 4. Delivered Fiber and Logging & Hauling Agreements have clauses requiring adherence to state BMPs.
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.1.3	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not sourced from forests converted to production plantation forest or non-forest lands after January 2008.
Finding	Company fiber purchase agreement prohibits suppliers from supplying products from knowingly supplying fiber that is sourced from lands that were converted to production plantation forest or non-forest lands after January 2008 or will be converted to plantation forest or none forest lands in the present or future. Production plantation forests are defined as forests of exotic species that have been planted or seeded by human intervention and that are under intensive stand management, are fast growing, and subject to short rotations (e.g. poplar, acacia or eucalyptus plantations).

	Company monitors compliance through BMP audits and records compliance on the BMP compliance checklist
Means of Verification	Delivered Fiber and Logging & Hauling Agreements, BMP compliance records
Evidence Reviewed	<ol style="list-style-type: none"> 1. Delivered Fiber and Logging & Hauling Agreements 2. BMP Compliance records – Tract Inspection Form (GBLLC-DOC-016)
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.2.1	The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them.
Finding	<p>Company has conducted a risk assessment on the supply basin. All fiber sourced can be traced to locations encompassed by the supply basin.</p> <p>Company requires that suppliers to harvest fiber in compliance with state BMPs to control the impact on the forests. Company conducts compliance checks to verify supplier compliance with BMPs.</p> <p>In addition state forestry agencies conduct BMP compliance checks randomly or upon request by stakeholders. State BMP compliance reports are available for review by Company.</p>
Means of Verification	Risk assessment, Delivered Fiber and Logging & Hauling Agreements, BMP compliance check records, state forestry BMP compliance reports
Evidence Reviewed	<ol style="list-style-type: none"> 1. FSC Controlled Wood/PEFC Due Diligence Risk Assessment (GBLLC-DOC-018) 2. SFI Fiber Sourcing Procedures (GBLLC-PROC-002) 3. BMP Compliance records – Tract Inspection Form (GBLLC-DOC-016) 4. Delivered Fiber and Logging & Hauling Agreements 5. Results of Georgia’s 2013 Silvicultural Best Management Practices Implementation and Compliance Survey 6. Florida Silviculture Best Management Practices 2013 Implementation Survey Report
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.2.2	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b).
Finding	<p>State BMPs set forth guidelines for maintaining and/or improving soil quality. GBLLC requires that all suppliers comply with state BMPs in harvesting operations. Company verifies supplier compliance with state BMPs through BMP compliance checks.</p> <p>Soil maps covering the supply basin are available as a resource to suppliers to assist in planning fiber harvest in a way that does not harm soil quality.</p>

Means of Verification	Company sustainable forestry policy, fiber sourcing procedures, BMP compliance records
Evidence Reviewed	<ol style="list-style-type: none"> 1. Sustainable Forestry Policy (GBLLC-POL-001) 2. SFI Fiber Sourcing Procedures (GBLLC-PROC-002) 3. BMP Compliance records – Tract Inspection Form (GBLLC-DOC-016) 4. USGS Soil Maps: http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.2.3	The Biomass Producer 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).
Finding	<p>Forests and other areas with high conservation values are identified and mapped.</p> <p>There is one Alliance for Zero Extinction Site (AZE), two Centre for Plant Diversity (CPD) sites, one GreenPeace Intact Forest (IF), one World Wildlife Fund (WWF) Global 200 ecoregion overlapping the wood basin. However, there are protected areas with a strong protection system for each HCV in the wood basin.</p> <p>The World Wildlife Fund's Global 200 Ecoregions build a framework for describing the most important areas of biodiversity on the planet. The Global 200 encompass almost 50% of life on earth. These 200 areas are places that conservation groups target and discuss with forest products companies about the loss of global, forest biodiversity (Olson et al., 2001). http://www.worldwildlife.org/science/ecoregions/global200.html</p> <p>Almost all of the counties in the GBLLC wood basin are within a single World Wildlife Fund Global 200 Ecoregions -</p> <ul style="list-style-type: none"> • Southeastern Coniferous & Broadleaf Forests (# 75 in the WWF Global 200) <p>Most of the counties are in the Southeastern Coniferous & Broadleaf Forests which has a conservation status of endangered/critical.</p> <p>This single global 200 ecoregion intersects the wood basin. It is significant at a global scale, but this <i>global</i> ecoregion (#75) is subdivided into two smaller endangered/critical terrestrial ecoregions. These scaled-down subdivisions have significance at the national level. In the following segments, the terrestrial ecoregions are discussed.</p> <p>http://wwf.panda.org/about_our_earth/ecoregions/ecoregion_list/</p> <p>The Southeastern Coniferous & Broadleaf Forests (Global 200 # 75)</p> <ul style="list-style-type: none"> • The Southeastern mixed forests (NA0413) • The Southeastern conifer forests (NA0529) <p>The Southeastern mixed forests (NA0413) is the first of two terrestrial ecoregions found within the Global 200 ecoregion # 75. It has a conservation status of endangered/critical.</p> <p>Only four counties in the northern end of the wood basin enter this terrestrial ecoregion – Bibb, Dooly, Houston, and Twiggs counties, GA. This is a highly degraded ecoregion with more than 99% of the original habitat having been altered. This region has been converted to other uses. Settlers within the ecoregion logged and then cleared the land for agriculture. The ecoregion overlaps the Piedmont on the Atlantic Slope and the rest falls into the Coastal Plain on the Gulf Coast. WWF reports that there is little habitat left to conserve in this critical/endangered ecoregion. Even though there are few protected examples (Bond Swamp National Wildlife Refuge, Ocmulgee National Monument, Robins</p>

	<p>Air Force Base) of this ecoregion <i>within the wood basin</i>, there are many more protected areas of the ecoregion <i>outside of the wood basin</i>.</p> <p>This region once contained three major types of stands: pure hardwood, pure pine, and mixed pine/hardwood stands. Fire was the driver of the pure pine stands. Once it was removed from the area, hardwood stands began to dominate the ecoregion.</p> <p>The Southeastern conifer forests (NA0529) is the second terrestrial ecoregion that makes up the global ecoregion # 75. It has a conservation status of endangered/critical.</p> <p>The GBLLC wood basin overlaps the northeastern portion of this ecoregion. The ecoregion, itself, extends from the Savannah River in Georgia across the coastal plain to the eastern parishes of Louisiana and south into Florida in the vicinity of Lake Okeechobee.</p> <p>This ecoregion is equated with the longleaf pine ecosystem that once spanned a significant portion of the coastal plain. It was dominated by longleaf pine overstory and an exceptionally diverse array of plants in the understory and herbaceous layer. The entire region was driven by a fire driven ecology. A regular fire regime once maintained essentially a single species overstory consisting of longleaf pine. Many species of birds, reptiles, and amphibians adapted to this environment as well. The red-cockaded woodpecker, gopher tortoise, indigo snake, and flatwoods salamander are some of the more threatened, regulated, and managed of those taxa.</p> <p>Fire was suppressed in this ecosystem as it was in many of the other regions in the southeast. Due to commercial and private development, conversion to agriculture, and the planting of loblolly pine in the area, the longleaf pine flatwoods have been reduced to less than 1% of its original size. However, there are several places where the natural habitat is being maintained and fire is still allowed into the systems. Most of the conservation sites that remain can be found on national forests, military bases, and state parks. Thanks to organizations like the Longleaf Alliance, private landowners are being given federal incentives to plant longleaf on their property and maintain those stands for many decades to come. As a result of education and conservation planning, there has been an increase in longleaf plantations over the past decade with an increase in newly planted acres every year within the ecoregion.</p> <p>A Greenpeace Intact Forest straddling Charlton and Ware counties is within the wood basin. It is almost entirely within the 403,119 acre Okefenokee National Wildlife Refuge which has been described as “one of North America’s most unspoiled, fascinating and precious natural areas”. The Okefenokee Swamp is the largest, intact, un-fragmented, freshwater and black water wilderness swamp in North America (http://www.okefenokee.com). There are 353,000 acres designated as a National Wilderness Area within the refuge. Two small fingers of the Greenpeace Intact Forest extend beyond the northern end of the refuge; the rest of the intact forest is within the refuge where it receives federal protection from the Department of the Interior.</p> <p>One Alliance for Zero Extinction Site (AZE), the Torreya State Park, is located within the wood basin in Liberty County, Florida. The park protects the bulk of extant occurrences of the Florida Torreya, <i>Torreya taxifolia</i> within its native range. Two additional protected areas near the park protect additional Torreya occurrences. The Florida Torreya, the target species within this AZE site, is an endemic to limestone bluffs along the Apalachicola River in Gadsden, Liberty, and Jackson counties FL as well as a few kilometers into Decatur County, GA, The Torreya is a tree. It originally comprised about 4% of the forest in this area. Its stems were used primarily for fence posts. A fungal blight destroyed the population. Its associate tree species include beech (<i>Fagus grandifolia</i>), yellow-poplar (<i>Liriodendron tulipifera</i>), American holly (<i>Ilex opaca</i>), Florida maple (<i>Acer barbatum</i>), loblolly pine (<i>Pinus taeda</i>), spruce pine (<i>P. glabra</i>), white oak (<i>Quercus alba</i>), eastern hophornbeam (<i>Ostrya virginiana</i>), and sweetgum (<i>Liquidambar styraciflua</i>). Artificial propagation of the Florida Torreya is ongoing. Cultivated individuals have survived in North Carolina for over 40 years.</p>
Means of Verification	Figures provided in FSC Controlled Wood/PEFC Due Diligence Risk Assessment (GBLLC-DOC-018)

Evidence Reviewed	<p>1. Following figures from FSC Controlled Wood/PEFC Due Diligence Risk Assessment (GBLLC-DOC-018)</p> <ul style="list-style-type: none"> a. Conservation International hotspots (Figure 3) b. Centres for Plant Diversity (Figure 4,5,6) c. GreenPeace Intact Forests (Figure 9) d. World Resources Institute (Global Forest Watch) Frontier Forests (Figure 10) e. Alliance for Zero Extinctions (AZE) sites (Figure 2)
Risk Rating	<p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>

	Indicator
2.2.4	The Biomass Producer has implemented appropriate control systems and procedures to ensure that biodiversity is protected (CPET S5b).
Finding	<p>Forests and other areas with high conservation values are identified and mapped.</p> <p>There is one Alliance for Zero Extinction Site (AZE), two Centre for Plant Diversity (CPD) sites, one GreenPeace Intact Forest (IF), one World Wildlife Fund (WWF) Global 200 ecoregion overlapping the wood basin. However, there are protected areas with a strong protection system for each HCV in the wood basin.</p> <p>The World Wildlife Fund's Global 200 Ecoregions build a framework for describing the most important areas of biodiversity on the planet. The Global 200 encompass almost 50% of life on earth. These 200 areas are places that conservation groups target and discuss with forest products companies about the loss of global, forest biodiversity (Olson et al., 2001). http://www.worldwildlife.org/science/ecoregions/global200.html</p> <p>Almost all of the counties in the GBLLC wood basin are within a single World Wildlife Fund Global 200 Ecoregions -</p> <ul style="list-style-type: none"> • Southeastern Coniferous & Broadleaf Forests (# 75 in the WWF Global 200) <p>Most of the counties are in the Southeastern Coniferous & Broadleaf Forests which has a conservation status of endangered/critical.</p> <p>This single global 200 ecoregion intersects the wood basin. It is significant at a global scale, but this <i>global</i> ecoregion (#75) is subdivided into two smaller endangered/critical terrestrial ecoregions. These scaled-down subdivisions have significance at the national level. In the following segments, the terrestrial ecoregions are discussed.</p> <p>http://wwf.panda.org/about_our_earth/ecoregions/ecoregion_list/</p> <p>The Southeastern Coniferous & Broadleaf Forests (Global 200 # 75)</p> <ul style="list-style-type: none"> • The Southeastern mixed forests (NA0413) • The Southeastern conifer forests (NA0529) <p>The Southeastern mixed forests (NA0413) is the first of two terrestrial ecoregions found within the Global 200 ecoregion # 75. It has a conservation status of endangered/critical.</p> <p>Only four counties in the northern end of the wood basin enter this terrestrial ecoregion – Bibb, Dooly, Houston, and Twiggs counties, GA. This is a highly degraded ecoregion with more than 99% of the original habitat having been altered. This region has been converted to other uses. Settlers within the ecoregion logged and then cleared the land for agriculture. The ecoregion overlaps the Piedmont on the Atlantic Slope and the rest falls into the Coastal Plain on the Gulf Coast. WWF reports that there is little habitat left to conserve in this critical/endangered ecoregion. Even though there are few protected examples (Bond Swamp National Wildlife Refuge, Ocmulgee National Monument, Robins Air Force Base) of this ecoregion <i>within the wood basin</i>, there are many more protected areas of the ecoregion <i>outside of the wood basin</i>.</p> <p>This region once contained three major types of stands: pure hardwood, pure pine, and mixed pine/hardwood stands. Fire was the driver of the pure pine stands. Once it was removed from the area, hardwood stands began to dominate the ecoregion.</p> <p>The Southeastern conifer forests (NA0529) is the second terrestrial ecoregion that makes up the global ecoregion # 75. It has a conservation status of endangered/critical.</p> <p>The GBLLC wood basin overlaps the northeastern portion of this ecoregion. The ecoregion, itself, extends from the Savannah River in Georgia across the coastal plain to the eastern parishes of Louisiana and south into Florida in the vicinity of Lake Okeechobee.</p>

	<p>This ecoregion is equated with the longleaf pine ecosystem that once spanned a significant portion of the coastal plain. It was dominated by longleaf pine overstory and an exceptionally diverse array of plants in the understory and herbaceous layer. The entire region was driven by a fire driven ecology. A regular fire regime once maintained essentially a single species overstory consisting of longleaf pine. Many species of birds, reptiles, and amphibians adapted to this environment as well. The red-cockaded woodpecker, gopher tortoise, indigo snake, and flatwoods salamander are some of the more threatened, regulated, and managed of those taxa.</p> <p>Fire was suppressed in this ecosystem as it was in many of the other regions in the southeast. Due to commercial and private development, conversion to agriculture, and the planting of loblolly pine in the area, the longleaf pine flatwoods have been reduced to less than 1% of its original size. However, there are several places where the natural habitat is being maintained and fire is still allowed into the systems. Most of the conservation sites that remain can be found on national forests, military bases, and state parks. Thanks to organizations like the Longleaf Alliance, private landowners are being given federal incentives to plant longleaf on their property and maintain those stands for many decades to come. As a result of education and conservation planning, there has been an increase in longleaf plantations over the past decade with an increase in newly planted acres every year within the ecoregion.</p> <p>A Greenpeace Intact Forest straddling Charlton and Ware counties is within the wood basin. It is almost entirely within the 403,119 acre Okefenokee National Wildlife Refuge which has been described as “one of North America’s most unspoiled, fascinating and precious natural areas”. The Okefenokee Swamp is the largest, intact, un-fragmented, freshwater and black water wilderness swamp in North America (http://www.okefenokee.com). There are 353,000 acres designated as a National Wilderness Area within the refuge. Two small fingers of the Greenpeace Intact Forest extend beyond the northern end of the refuge; the rest of the intact forest is within the refuge where it receives federal protection from the Department of the Interior.</p> <p>One Alliance for Zero Extinction Site (AZE), the Torreya State Park, is located within the wood basin in Liberty County, Florida. The park protects the bulk of extant occurrences of the Florida Torreya, <i>Torreya taxifolia</i> within its native range. Two additional protected areas near the park protect additional Torreya occurrences. The Florida Torreya, the target species within this AZE site, is an endemic to limestone bluffs along the Apalachicola River in Gadsden, Liberty, and Jackson counties FL as well as a few kilometers into Decatur County, GA. The Torreya is a tree. It originally comprised about 4% of the forest in this area. Its stems were used primarily for fence posts. A fungal blight destroyed the population. Its associate tree species include beech (<i>Fagus grandifolia</i>), yellow-poplar (<i>Liriodendron tulipifera</i>), American holly (<i>Ilex opaca</i>), Florida maple (<i>Acer barbatum</i>), loblolly pine (<i>Pinus taeda</i>), spruce pine (<i>P. glabra</i>), white oak (<i>Quercus alba</i>), eastern hophornbeam (<i>Ostrya virginiana</i>), and sweetgum (<i>Liquidambar styraciflua</i>). Artificial propagation of the Florida Torreya is ongoing. Cultivated individuals have survived in North Carolina for over 40 years.</p>
Means of Verification	Figures provided in FSC Controlled Wood/PEFC Due Diligence Risk Assessment (GBLLC-DOC-018)
Evidence Reviewed	<ol style="list-style-type: none"> 1. Following figures from FSC Controlled Wood/PEFC Due Diligence Risk Assessment (GBLLC-DOC-018) <ol style="list-style-type: none"> a. Conservation International hotspots (Figure 3) b. Centres for Plant Diversity (Figure 4,5,6) c. GreenPeace Intact Forests (Figure 9) d. World Resources Institute (Global Forest Watch) Frontier Forests (Figure 10) e. Alliance for Zero Extinctions (AZE) sites (Figure 2)
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.2.5	The Biomass Producer has implemented appropriate control systems and procedures for verifying that the process of residue removal minimises harm to ecosystems.
Finding	GBLLC has appropriate control systems and procedures to ensure residue removals are minimized in harming the ecosystem. State BMPs address wood and residue utilization. Delivered Fiber and Logging & Hauling Agreements have clauses requiring adherence to state BMPs. Procedures are in place to monitor BMP compliance on tracts delivering fiber directly from the forest. BMP Compliance Checklists are used to record wood utilization. Lastly, the Company has plans to distribute “Forest Biomass Retention and Harvesting Guidelines for the Southeast” from the Forest Guild to be used as a tool to ensure biomass removal minimizes the harm to ecosystems.
Means of Verification	State BMPs, Delivered Fiber and Logging & Hauling Agreements provisions with suppliers, BMP compliance checks
Evidence Reviewed	<ol style="list-style-type: none"> 1. State BMP Manuals <ol style="list-style-type: none"> a. GA: http://www.gfc.state.ga.us/resources/publications/BMPManualGA0609.pdf b. FL: http://www.freshfromflorida.com/Divisions-Offices/Florida-Forest-Service/Our-Forests/Best-Management-Practices-BMP 2. SFI Fiber Sourcing Procedures (GBLLC-PROC-002) 3. Delivered Fiber and Logging & Hauling Agreements 4. BMP Compliance records – Tract Inspection Form (GBLLC-DOC-016) 5. Results of Georgia’s 2013 Silvicultural Best Management Practices Implementation and Compliance Survey 6. Florida Silviculture Best Management Practices 2013 Implementation Survey Report 7. “Forest Biomass Retention and Harvesting Guidelines for the Southeast” (Forest Guild):http://www.forestguild.org/publications/research/2012/FG_Biomass_Guidelines_SE.pdf
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.2.6	The Biomass Producer has implemented appropriate control systems and procedures to verify that negative impacts on ground water, surface water and water downstream from forest management are minimised (CPET S5b).
Finding	<p>State and Federal laws, such as the Clean Water Act, are in place to protect the waters of the United States. Access to these laws is available to GBLLC personnel. State Forestry Commissions, working with state Environmental Protection Divisions are charged with the enforcement of these state and federal laws. In addition, state forestry BMPs have been developed to provide guidance in water quality protection. The state forestry agencies also conduct BMP compliance checks throughout the year and publicly report their findings.</p> <p>GBLLC policy and procedures are in place to provide support and guidance on how Company employees and suppliers will meet BMPs in the harvest of fiber without having negative impacts to water quality. Delivered Fiber and Logging & Hauling Agreements have clauses requiring adherence to state BMPs. Procedures are in place to monitor BMP compliance on tracts delivering fiber directly from the forest.</p>

Means of Verification	State and Federal laws, State BMPs, Delivered Fiber and Logging & Hauling Agreements provisions with suppliers, BMP compliance checks
Evidence Reviewed	<ol style="list-style-type: none"> 1. State BMP Manuals <ol style="list-style-type: none"> a. GA: http://www.gfc.state.ga.us/resources/publications/BMPManualGA0609.pdf b. FL: http://www.freshfromflorida.com/Divisions-Offices/Florida-Forest-Service/Our-Forests/Best-Management-Practices-BMP 2. SFI Sustainable Forestry Policy (GBLLC-POL-001) 3. SFI Fiber Sourcing Procedures (GBLLC-PROC-002) 4. Delivered Fiber and Logging & Hauling Agreements 5. BMP Compliance records – Tract Inspection Form (GBLLC-DOC-016) 6. Results of Georgia’s 2013 Silvicultural Best Management Practices Implementation and Compliance Survey 7. Florida Silviculture Best Management Practices 2013 Implementation Survey Report
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.2.7	The Biomass Producer has implemented appropriate control systems and procedures for verifying that air quality is not adversely affected by forest management activities.
Finding	<p>While GBLLC does not conduct forest management activities (prescribed burning) that directly impacts air quality, the Company actively promotes the use of prescribed burning to forest landowners as a sustainable forestry activity through its SFI Fiber Sourcing certification. GBLLC actively educates forest landowners about sustainable forestry by providing educational materials developed for landowners.</p> <p>GBLLC is located in a rural area in GA and purchases fiber from rural areas located in GA and FL. Most of the Company’s supply basin is located in areas outside of priority airsheds.</p> <p>Both GA and FL forest assessment reports state forest activities such as prescribed burning have mixed impacts on the forests. While smoke from prescribed burning can lower air quality temporarily, the lack of burning has a direct negative impact of longleaf pine and other fire tolerant species within the Company’s supply basin.</p>
Means of Verification	Employee interviews, SFI Annual Progress Report, state Forest Action Plans
Evidence Reviewed	<ol style="list-style-type: none"> 1. SFI Fiber Sourcing Procedures (GBLLC-PROC-002) 2. SFI Annual Progress Reports: http://www.sfiprogram.org/files/pdf/2014-sfi-progress-report-spreads/ 3. Georgia Statewide Assessment of Forest Resources(2010) http://forestactionplans.org/states/georgia 4. Forest Resources – 2010 Florida’s Statewide Strategies http://forestactionplans.org/states/florida
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.2.8	The Biomass Producer has implemented appropriate control systems and procedures for verifying that there is controlled and appropriate use of chemicals, and that Integrated Pest Management (IPM) is implemented wherever possible in forest management activities (CPET S5c).
Finding	While GBLLC does not conduct forest management activities which use forest chemicals, the Company actively promotes the use of Integrated Pest Management to forest landowners as a sustainable forestry activity through its SFI Sourcing certification. The Company actively educates forest landowners about sustainable forestry by providing educational materials developed for landowners. The Company actively participates on the GA SFI State Implementation Committee (SIC) as part of its SFI Sourcing certification. Participation on this SIC enables GBLLC personnel to interact with University research extension personnel as well as foresters who are actively managing the state’s forests. As a result of these interactions, Company personnel keep informed of current forest management trends.
Means of Verification	Employee interviews, SFI Annual Progress Report
Evidence Reviewed	1. SFI Fiber Sourcing Procedures (GBLLC-PROC-002) 2. SFI Annual Progress Reports: http://www.sfiprogram.org/files/pdf/2014-sfi-progress-report-spreads/ 3. GA SIC Meeting Minutes
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.2.9	The Biomass Producer has implemented appropriate control systems and procedures for verifying that methods of waste disposal minimise negative impacts on forest ecosystems (CPET S5d).
Finding	State and Federal laws, such as the CERCLA, are in place to protect from oil spills and hazardous substance releases. Access to these laws is available to Company personnel. Company procedures require suppliers to maintain SFI training which includes modules addressing proper waste disposal. Delivered Fiber and Logging & Hauling Agreements have clauses requiring adherence to federal, state and local laws and state BMPs. Company BMP compliance checks also record the existence of trash or oil spills on forest lands.
Means of Verification	State and Federal law, State BMPs, Delivered Fiber and Logging & Hauling Agreements, Master Logger Training records, BMP compliance checks
Evidence Reviewed	1. Federal law a. CERCLA - 42 US Code Chapter 103: http://www.epa.gov/agriculture/lcla.html 2. State BMP Manuals a. GA: http://www.gfc.state.ga.us/resources/publications/BMPManualGA0609.pdf b. FL: http://www.freshfromflorida.com/Divisions-Offices/Florida-Forest-Service/Our-Forests/Best-Management-Practices-BMP 3. Results of Georgia’s 2013 Silvicultural Best Management Practices Implementation and Compliance Survey

	4. Florida Silviculture Best Management Practices 2013 Implementation Survey Report 5. State Master Logger lists a. GA: http://ga-mth.forestry.uga.edu/ b. FL: http://floridaforest.org/programs/master-logger/ 6. Sustainable Forestry Policy (GBLLC-POL-001) 7. SFI Fiber Sourcing Procedures (GBLLC-PROC-002) 8. Delivered Fiber and Logging & Hauling Agreements 9. BMP Compliance records – Tract Inspection Form (GBLLC-DOC-016)
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.3.1	Analysis shows that feedstock harvesting does not exceed the long-term production capacity of the forest, avoids significant negative impacts on forest productivity and ensures long-term economic viability. Harvest levels are justified by inventory and growth data.
Finding	Harvest levels for GA and FL do not exceed growth according to USDA Forest Service forest inventory data. Forest Service removals, growth and mortality records for 2013 show a positive average rate of growth to removals (and mortality) at 1.03 for all species with softwood being 1.08. More data from GA shows from 2009 to 2013 the average annual growth to harvest rate of 1.5 for all species as well as 1.3 for pine and 1.8 for hardwood statewide. FL 2012 data shows pine growth to removals data for the Northeast Unit to be 1.04.
Means of Verification	USDA Forest Service FIA data
Evidence Reviewed	1. USDA Forest Service Forest Inventory Analysis Data (Reports 26.2, 40.2 & 33.2) http://apps.fs.fed.us/fido/standardrpt.html 2. Forests of Georgia, 2013 – USDA Resource Update FS-38 (Mar 2015) 3. Forests of Florida, 2012 – USDA Resource Update FS-27 (Nov 2014)
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.3.2	Adequate training is provided for all personnel, including employees and contractors (CPET S6d).
Finding	Company policy requires all professional wood producers delivering wood to complete SFI Implementation Committee approved logger training to achieve SFI Logger Education “trained” status. Company procedures provide guidance on who should be trained and how to check training records. GBLLC’s fiber procurement staff is also Master Logger trained.
Means of Verification	Master Logger Training records, Company training records
Evidence Reviewed	1. State Master Logger lists a. GA: http://ga-mth.forestry.uga.edu/

	b. FL: http://floridaforest.org/programs/master-logger/ 2. Sustainable Forestry Policy (GBLLC-POL-001) 3. SFI Fiber Sourcing Procedures (GBLLC-PROC-002) 4. Training Records (GBLLC-DOC-003)
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.3.3	Analysis shows that feedstock harvesting and biomass production positively contribute to the local economy, including employment.
Finding	In addition to the 30-50 jobs created at the facility, GBLLC has created another market for wood fiber. This additional market only adds to a forest products industry that is a leading industry and employer in both GA and FL. According to recent economic studies, forestry is a \$16.9 billion industry in GA and a \$11.2 billion industry in FL for 2013. Forestry and its related jobs accounted for over 50,000 direct jobs and supported a total of 133,353 employees in GA. In FL forestry was a \$14.52 billion industry and impacted 74,500 full-time and part-time jobs in 2013.
Means of Verification	Economic studies, Employee interviews
Evidence Reviewed	1. Economic Benefits of the Forest Industry in Georgia: 2013 2. 2013 Florida Forestry Economic Highlights
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.4.1	The Biomass Producer 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).
Finding	<p>GBLLC's FSC Controlled Wood/PEFC Due Diligence Risk Assessment assesses the health, vitality and other services provided by the forest ecosystems within the supply area. This risk assessment has identified key ecosystems and habitats present within the supply area. The risk assessment also has determined there is low risk of working in areas of high conservation value.</p> <p>Company policy and procedures are place to provide support and guidance on how Company employees and suppliers will meet BMPs in the harvest of fiber for the mill thus verifying the health and vitality of the forest ecosystems. Delivered Fiber and Logging & Hauling Agreements have clauses requiring adherence to state BMPs. Procedures are in place to monitor BMP compliance on tracts delivering fiber directly from the forest. The Company also actively promotes the use of sustainable forest practices to forest landowners through its SFI Fiber Sourcing certification. The Company actively educates forest landowners about sustainable forestry by providing educational materials developed for landowners.</p> <p>GBLLC also works with state forestry agencies, as needed, to address issues of forest health through its participation on the GA SIC.</p>

Means of Verification	Risk assessment, Delivered Fiber and Logging & Hauling Agreements, Company policy and procedures, BMP Compliance checklists
Evidence Reviewed	<ol style="list-style-type: none"> 1. FSC Controlled Wood/PEFC Due Diligence Risk Assessment (GBLLC-DOC-018) 2. Sustainable Forestry Policy (GBLLC-POL-001) 3. SFI Fiber Sourcing Procedures (GBLLC-PROC-002) 4. BMP Compliance records – Tract Inspection Form (GBLLC-DOC-016) 5. Delivered Fiber and Logging & Hauling Agreements
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.4.2	The Biomass Producer has implemented appropriate control systems and procedures for verifying that natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b).
Finding	<p>While GBLLC does not conduct forest management activities that manage fires, pests and diseases, the Company actively promotes the use of prescribed burning and other integrated pest management activities to forest landowners as a sustainable forestry activity through its SFI Sourcing certification. The Company actively educates forest landowners about sustainable forestry by providing educational materials developed for landowners.</p> <p>GBLLC will also work with state forestry agencies, as needed, to address issues of forest health through its participation on the GA SIC.</p> <p>The GA Forestry Commission in its 2012 Annual Report stated wildfires burned 27,162 acres for the year. GFC stated 2012 was a relatively moderate year in both fires and acres. GFC foresters incorporated insect, disease, or invasive species advice into 797 management cases involving 53,128 acres for the year.</p> <p>The FL Forest Service in its 2014 Annual Report stated there were 2,176 fires burning 90,876 acres.</p>
Means of Verification	State forestry agency reports
Evidence Reviewed	<ol style="list-style-type: none"> 1. SFI Fiber Sourcing Procedures (GBLLC-PROC-002) 2. SFI Annual Progress Report 3. GA SIC Committee Meeting Minutes 4. GFC 2012 Annual Report http://www.gfc.state.ga.us/resources/publications/2012AnnualReport.pdf 5. FFS 2014 Annual Report http://www.freshfromflorida.com/Forms-Publications/Publications/FDACS-Annual-Reports
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.4.3	The Biomass Producer has implemented appropriate control systems and procedures for verifying that there is adequate protection of the forest from unauthorised activities, such as illegal logging, mining and encroachment (CPETS7c).
Finding	There are appropriate control systems and procedures to ensure that legality of ownership and land use can be demonstrated for the Supply Base. Illegal harvesting in the supply base is prohibited by state laws. In most states the timber buyers and/or harvesting companies have to be licensed in order to conduct their business. Evidence indicates that major violations are prosecuted and legal liability is enforced. There is no evidence suggesting that illegal logging is a wide scale problem in the United States (US). Commonly used terms for violations in US are timber theft, tree poaching and unlawful logging. Thefts do occur, however the share of illegal felling in hardwoods is much smaller than 1% according to a study conducted by American Hardwood Export Council. It is logical to conclude that similarly illegal logging is not a major problem for softwoods in US. Further, legality of ownership and land use is enforced through Company procedures and contractual agreements by suppliers.
Means of Verification	State laws, Company policy, regional risk assessment, contract provisions with suppliers.
Evidence Reviewed	<ol style="list-style-type: none"> 1. Company policy requires that all applicable laws and regulations are followed (GBLLC-POL-001) 2. Chain of Custody Procedures requires legal ownership of feedstock received (GBLLC-PROC-001) 3. FSC Controlled Wood / PEFC Due Diligence Risk Assessment (GBLLC-DOC-018) states illegal harvesting of feedstock is LOW risk. 4. Delivered Fiber and Logging & Hauling Agreements have clauses concerning the legality of ownership of the feedstock to be purchased. 5. State laws addressing illegal logging and wood theft are as follows: <u>Georgia Laws</u> House Bill - HB 790 (A BILL TO BE ENTITLED AN ACT) Signed by Governor: April 29, 2014 Effective Date: July 1, 2014 Provides additional enforcement authority to Georgia Forestry Commission investigators In cases involving the unauthorized cutting or cutting and carrying away of timber from the property of another damages shall be awarded in accordance with GA. CODE ANN. § 51-12-50. Amends GA. CODE ANN. § 51-12-50 whereas damages shall be: (1) Treble the fair market value of the trees cut as they stood; (2) Treble the diminished fair market value of any trees incidentally harmed; (3) Costs of reasonable reforestation activities related to the plaintiff's injury; and (4) Attorney fees and expenses of litigation. When defendant is a willful trespasser, plaintiff may receive punitive damages. Amends GA. CODE ANN. § 12-6-23 relating to wood load ticket required for wood removal, so as to require purchasers to provide the proper tickets to sellers of timber within 20 days GA Codes Title 12 Forest Resources and other Plant Life Article 1 – Forestry Resources GA. CODE § 12-6-23 - Wood load ticket required for wood removal; form; exceptions GA. CODE § 12-6-24 - Notice of timber harvesting operations - See more at: http://statutes.laws.com/georgia/title-12/chapter-6/article-1/part-1a#sthash.J9TcZrl6.dpuf County Laws in Georgia can be found online at: http://warnell.forestry.uga.edu/warnell/service/library/index.php3?docID=272&docHistory[]=1

	<p><u>Florida Laws</u> Title XXXIII Regulation of Trade, Commerce, Investments, and Solicitations Chapter 536 Timber and Lumber</p> <p>§ 536.13 Stamp or brand for logs. Any person engaged in this state in the business of getting out, buying, selling, or manufacturing saw logs, may adopt a stamp or brand for...</p> <p>§ 536.14 Brands to be recorded by clerk of circuit court. A person may execute a written declaration that she or he has adopted a brand, describing it, and after acknowledgment of such declaration before any...</p> <p>§ 536.15 May prevent use by others. Any person who has had her or his brand recorded in any county, may prevent other persons from using the same in said county by...</p> <p>§ 536.16 Prima facie evidence of ownership. Any log found in any county branded with a brand recorded in said county by any person shall be deemed prima facie to be the...</p> <p>§ 536.17 Where two or more brands the same. In case there shall be recorded in the same county two or more brands the same, or substantially the same, the brand first recorded shall...</p> <p>§ 536.18 Defacing the mark or brand of lumber and timber. If any person shall fraudulently alter, change or deface the duly recorded mark, brand, or stamp of any lumber, logs or timber, or shall fraudulently...</p> <p>§ 536.19 Unlawful use of recorded log brand or stamp. Any person who shall unlawfully use any recorded log brand or stamp of another shall be guilty of a misdemeanor of the second degree, punishable...</p>
Risk Rating	<p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>

	Indicator
2.5.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that legal, customary and traditional tenure and use rights of indigenous people and local communities related to the forest are identified, documented and respected (CPET S9).
Finding	<p>There are appropriate control systems and procedures to verify that legal, customary and traditional tenure and use rights of indigenous people and local communities related to the forest are identified, documented and respected for the Supply Base.</p> <p>According to the Company's FSC Controlled Wood Risk Assessment FSC's Global Forestry Registry the United States can be shown as LOW RISK. They go on to say that "International assessments of violation of traditional or civil rights do not identify the US as problematic. In addition, the US has equitable processes in place to resolve disputes. Native Americans are protected by federal law rather than state law according to the Nonintercourse Act of 1790. The Indian Removal Act of 1830 was intended to promote the voluntary removal of Native Americans out of the US Territory peacefully through treaties and land sales. There are no recognized Native American tribes located within the GBLCC supply area.</p>
Means of Verification	Risk Assessment
Evidence Reviewed	1. FSC Controlled Wood/PEFC Due Diligence Risk Assessment (GBLLC-DOC-018)

Risk Rating	<input checked="" type="checkbox"/> Low Risk	<input type="checkbox"/> Specified Risk	<input type="checkbox"/> Unspecified Risk at RA
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	Indicator
2.5.2	The Biomass Producer has implemented appropriate control systems and procedures for verifying that production of feedstock does not endanger food, water supply or subsistence means of communities, where the use of this specific feedstock or water is essential for the fulfilment of basic needs.
Finding	GBLLC policy and procedures are in place to provide support and guidance on how Company employees and suppliers meet BMPs in the harvest of fiber for the mill thus verifying the production of feedstock does not endanger food, water supply or subsistence means of communities, where the use of this specific feedstock or water is essential for the fulfilment of basic needs. Delivered Fiber and Logging & Hauling Agreements have clauses requiring adherence to state BMPs. Procedures are in place to monitor BMP compliance on tracts delivering fiber directly from the forest. GBLLC will be reaching out to local and regional stakeholders who may have specific needs from the forestlands within their community. Feedback from these stakeholder consultations will be addressed as needed.
Means of Verification	Company policy and procedures, Fiber Purchase Contract, BMP Compliance Checklists, Stakeholder consultation feedback and follow-up
Evidence Reviewed	<ol style="list-style-type: none"> 1. Sustainable Forestry Policy (GBLCC-POL-001) 2. SFI Fiber Sourcing Procedures (GBLLC-PROC-002) 3. Delivered Fiber and Logging & Hauling Agreements 4. BMP Compliance records – Tract Inspection Form (GBLLC-DOC-016) 5. SBP Stakeholder List (GBLLC-DOC-009) 6. Stakeholder Letter Template
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.6.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that appropriate mechanisms are in place for resolving grievances and disputes, including those relating to tenure and use rights, to forest management practices and to work conditions.
Finding	GBLLC has complaint mechanisms in place as part of its chain of custody and controlled wood / due diligence procedures. Both procedures provide guidance on when and how the Company respond to grievances and complaints.
Means of Verification	Company procedures, Interview with certification body
Evidence Reviewed	<ol style="list-style-type: none"> 1. Chain of Custody Procedures (GBLLC-PROC-001) 2. FSC Controlled Wood/PEFC Due Diligence System Procedures (GBLLC-PROC-003) 3. Controlled Wood Complaint Report (GBLLC-DOC-019) 4. Controlled Wood Complaints Log (GBLLC-DOC-020)

Risk Rating	<input checked="" type="checkbox"/> Low Risk	<input type="checkbox"/> Specified Risk	<input type="checkbox"/> Unspecified Risk at RA
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	Indicator
2.7.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that Freedom of Association and the effective recognition of the right to collective bargaining are respected.
Finding	GBLLC recognizes the right to collective bargaining and the Freedom of Association. The Company is FSC Chain of Custody certified and has signed the Self Declaration which demonstrates support of FSC Policy FSC-POL-01-004, Policy for the Association of Organizations with FSC. Further, Federal laws in the United States codified in both the National Labor Relations Act of 1935 and OSHA protect workers' rights to collective bargaining. Both GA and FL are Right to Work states.
Means of Verification	Employee interviews, FSC Self Declaration, Federal Laws
Evidence Reviewed	<ol style="list-style-type: none"> 1. FSC Self Declaration 2. National Labor Relations Act: http://www.nlr.gov/resources/national-labor-relations-act 3. 29 CFR 2200.22: https://www.law.cornell.edu/cfr/text/29/2200.22
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.7.2	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not supplied using any form of compulsory labour.
Finding	<p>The United States Federal Constitution 13th Amendment provides “Neither slavery nor involuntary servitude, except as a punishment for crime whereof the party shall have been duly convicted, shall exist within the United States, or any place subject to their jurisdiction”</p> <p>Further, benefiting from compulsory labor in the United States is a federal crime punishable by up to 20 years in prison.</p> <p>The Company also has policies on workers rights, discrimination, etc.</p>
Means of Verification	Company employment policies, Employee interviews
Evidence Reviewed	<ol style="list-style-type: none"> 1. Employment Posters 2. Employment Handbook 3. Company Policies 4. Amendment XIII of the United States Constitution: https://www.law.cornell.edu/constitution/amendmentxiii 5. 18 US Code 1589: https://www.law.cornell.edu/uscode/text/18/1589
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.7.3	The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is not supplied using child labour.
Finding	State and Federal laws, such as the Equal Employment Opportunity and OSHA, are in place to prohibit child labor. Specifically, Mississippi state law provides that “No boy or girl under the age of fourteen (14) years shall be employed or permitted to work in any mill, cannery, workshop, factory, or manufacturing establishment within this state. The Company also has policies on workers rights, discrimination, etc.
Means of Verification	Review of Company employment policies, Employee interviews
Evidence Reviewed	<ol style="list-style-type: none"> 1. Employment Posters 2. Employment Handbook 3. Company Policies 4. US Federal Child Labor Laws: http://www.dol.gov/whd/childlabor.htm 5. GA Child Labor Law: http://www.dol.state.ga.us/em/child_labor.htm 6. FL Child Labor Law: http://www.myfloridalicense.com/dbpr/reg/childlabor/
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.7.4	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not supplied using labour which is discriminated against in respect of employment and occupation.
Finding	State and Federal laws, such as the Equal Employment Opportunity and OSHA, are in place to provide rights to workers. The Company also has policies on workers rights, discrimination, etc.
Means of Verification	Review of Company employment policies, Employee interviews, Federal laws
Evidence Reviewed	<ol style="list-style-type: none"> 1. Employment Posters 2. Employment Handbook 3. Company Policies 4. 2 US Code 1311: https://www.law.cornell.edu/uscode/text/2/1311 5. Equal Pay Act of 1963: http://www.eeoc.gov/laws/statutes/epa.cfm
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.7.5	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is supplied using labour where the pay and employment conditions are fair and meet, or exceed, minimum requirements.

Finding	State and Federal laws, such as the Equal Employment Opportunity and OSHA, are in place to ensure pay and employment conditions are fair. The Company also has policies on workers rights, pay, safety, etc.
Means of Verification	Review of Company employment policies, Employee interviews
Evidence Reviewed	1. Employment Posters 2. Employment Handbook 3. Company Policies
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.8.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12).
Finding	State and Federal laws, such as OSHA to ensure worker health and safety in the work place. The Company also has policies on workers health and safety. The Company has a health and safety program that is managed by dedicated personnel. This program includes the use of personal protective equipment and safety meetings.
Means of Verification	Review of Company safety manual, Training records, Employee interviews
Evidence Reviewed	1. Company Safety Manual 2. Safety Training records 3. Safety Inspections
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.9.1	Biomass is not sourced from areas that had high carbon stocks in January 2008 and no longer have those high carbon stocks.
Finding	USDA Forest Service FIA data on carbon storage for the Company's supply area was determined to be almost 974 million short tons in 2007. FIA data was not available for the stated year of 2008 in both states. In 2013 the supply area was determined to have 996 million short tons of carbon stock. This accounts for over a 2.27% increase in 6 years.
Means of Verification	USDA Forest Service FIA data
Evidence Reviewed	1. Carbon Reports from Forest Data Inventory Online from the USDA Forest Service website (FIDO Carbon Reports 47.1, 48.1, 50.1, 51.1, 52.1, 53.2, 54.2).
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.9.2	Analysis demonstrates that feedstock harvesting does not diminish the capability of the forest to act as an effective sink or store of carbon over the long term.
Finding	USDA Forest Service FIA data on carbon storage for the Company's supply area was determined to be almost 974 million short tons in 2007. FIA data was not available for the stated year of 2008 in both states. In 2013 the supply area was determined to have 996 million short tons of carbon stock. This accounts for over a 2.27% increase in 6 years.
Means of Verification	USDA Forest Service FIA data
Evidence Reviewed	1. Carbon Reports from Forest Data Inventory Online from the USDA Forest Service website (FIDO Carbon Reports 47.1, 48.1, 50.1, 51.1, 52.1, 53.2, 54.2).
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

	Indicator
2.10.1	Genetically modified trees are not used.
Finding	The Company completed a FSC Controlled Wood/PEFC Due Diligence Risk Assessment (GBLLC-DOC-018) which assessed the level of risk GMO trees are available for operational use. The Risk Assessment states there are no operational GMO forests or stands in the United States.
Means of Verification	Review of citations within Risk Assessment
Evidence Reviewed	1. FSC Controlled Wood/PEFC Due Diligence Risk Assessment (GBLLC-DOC-018)
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA