

# SCS Global Services Evaluation of MRE Crossville, LLC Compliance with the SBP Framework: Public Summary Report

Main (Initial) Audit

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## Completed in accordance with the CB Public Summary Report Template Version 1.4

*For further information on the SBP Framework and to view the full set of documentation see [www.sbp-cert.org](http://www.sbp-cert.org)*

### *Document history*

*Version 1.0: published 26 March 2015*

*Version 1.1: published 30 January 2018*

*Version 1.2: published 4 April 2018*

*Version 1.3: published 10 May 2018*

*Version 1.4: published 16 August 2018*

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# 1 Overview

CB Name and contact: SCS Global Services, 2000 Powell St. Ste 600 Emeryville, CA 94608

Primary contact for SBP: Sarah Harris, SHarris@scsglobalservices.com

Current report completion date: 01/Sep/2019

Report authors: Tucker Watts

Name of the Company: Mohegan Renewable Energy Crossville Plant, 79 Greenway Drive, Crossville, AL 35962, United States

Company contact for SBP: Mike Walker, 256-572-8928, mwalker@moheganrenewables.com

Certified Supply Base: Portions of Alabama (57 counties), Georgia (64 counties), Mississippi (25 counties) and Tennessee (69 counties) within the United States

SBP Certificate Code: SBP-04-49

Date of certificate issue: 20/Nov/2019

Date of certificate expiry: 19/Nov/2024

This report relates to the Main (Initial) Audit

## 2 Scope of the evaluation and SBP certificate

The scope of this surveillance audit included a review of procedures, documentation, records and databases to ensure the organization's management system is appropriate to ensuring conformance to SBP Standards 1, 2, 4, and 5. Other audit methods used were field audits, site walkthrough of pellet mill and interviews with relevant staff, port representative and supplier representatives. The evaluation included a review of documentation such as the Supply Base Report including the Risk Assessment, due diligence systems, supplier contracts and SAR, among others.

The certificate scope includes production and distribution of wood pellets, at the mill in Crossville, AL and transportation to the port of Guntersville, AL. The ownership of the SBP-certified pellets is passed on to their customer upon loading the barge. The scope does not include any storage or trans-shipment sites.

### 3 Specific objective

The specific objective of this evaluation was to confirm that the BP's management system is capable of ensuring that all requirements of specified SBP Standards are implemented across the entire scope of certification. The following SBP critical control points were assessed.:

- Procurement of feedstock. Assessed through supplier documentation with feedstock properties (trip/ scale tickets) and incoming loads database
- Accounting of materials: review of material accounting records, credit ledgers for tracking of volumes, feedstock types and claims, spreadsheets with total volume of pellets produced, staff awareness assessed through interviews.
- Collection assessment information: review of energy databases and calculations and SAR & SBPD
- Supply Base Evaluation and mitigation measures: assessed through review of SBR, SBR Annex I, interviews with procurement staff, suppliers and procedures

## 4 SBP Standards utilised

### 4.1 SBP Standards utilised

Please select all SBP Standards used during this evaluation. All Standards can be accessed and downloaded from <https://sbp-cert.org/documents/standards-documents/standards>

- SBP Framework Standard 1: Feedstock Compliance Standard (Version 1.0, 26 March 2015)
- SBP Framework Standard 2: Verification of SBP-compliant Feedstock (Version 1.0, 26 March 2015)
- SBP Framework Standard 4: Chain of Custody (Version 1.0, 26 March 2015)
- SBP Framework Standard 5: Collection and Communication of Data (Version 1.0, 26 March 2015)

### 4.2 SBP-endorsed Regional Risk Assessment

Not applicable

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

### 5.1 Description of Company

Mohegan Renewable Energy - Crossville (MREC) purchases secondary & tertiary feedstock in the form of hardwood and softwood chips and sawdust through its sole supplier, DeKalb Forest Products. DeKalb Forest Products purchases hardwood directly from the forest and chips this wood at its wood yard/chip mill about 0.25 miles from the MREC pellet mill. DeKalb also purchases pine & hardwood residual chips, sawdust and shavings for about 20 secondary sawmills and tertiary re-manufacturing facilities in Alabama, Georgia and Tennessee. The supply base for the pellet mill and its secondary suppliers includes two hundred fifteen (215) counties (27,779,472 hectares) in Alabama (57 counties), Georgia (64 counties), Mississippi (25 counties) and Tennessee (69 counties) within the United States.

### 5.2 Description of Company's Supply Base

Mohegan Renewable Energy - Crossville (MREC) purchases secondary & tertiary feedstock in the form of hardwood and softwood chips and sawdust through its sole supplier, DeKalb Forest Products. DeKalb Forest Products purchases hardwood directly from the forest and chips this wood at its wood yard/chip mill about 0.25 miles from the MREC pellet mill. DeKalb also purchases pine & hardwood residual chips, sawdust and shavings for about 20 secondary sawmills and tertiary re-manufacturing facilities in Alabama, Georgia and Tennessee. The supply base for the pellet mill and its secondary suppliers includes two hundred fifteen (215) counties (27,779,472 hectares) in Alabama (57 counties), Georgia (64 counties), Mississippi (25 counties) and Tennessee (69 counties) within the United States. The suppliers and sub-suppliers identified were located using GIS technology. Their estimated supply area was determined through interviews to establish the counties they source from, a stated maximum haul radius or a sixty (60) mile delivery radius was established for each supplier. The accumulation of these feedstock supplier areas was then used to identify the origin of wood fiber by states and counties from which MREC purchases wood fiber.

### 5.3 Detailed description of Supply Base

Forests are the predominant land use in this supply base (64%). Hardwood forests comprise the largest forest type (54.1%) of the supply area's forestland followed by pine forests (34.2%). The pine/oak forest comprises 11.2% of the supply area's forestland while about 0.5% of the forestland is considered non-stocked. About 77% of the supply area's forests are managed as natural forests while the remaining 23% of the supply area's forests are artificially regenerated.

The forest products industry is a very large part of the area's economy and is one of the top industries within the states generating \$18.5 billion in AL (2016), \$21 .3 billion in GA (2017) and 924.3 billion in TN (2015)



annually.

MREC uses hardwood and pine chips and sawdust. Primary species used include loblolly pine (*Pinus taeda*), oak (*Quercus* spp.), Maple (*Acre* spp.), and many other hardwood species. None of these species are listed on the CITES list. Longleaf pine is on the IUCN Red List and is classified as endangered. Pine forests are typically managed on an even-aged basis with a rotation age of 30 to 40 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 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 cost. 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 MREC supply area are managed according to state forestry best management practices (BMPs). Overall BMP compliance reported for the various states within the supply base are: AL - 98.2% (2016); GA - 93.17% (2017); MS - 96.1% (2016); and TN - 88.5% (2017).

Sustainable forestry certification is present in MREC'S supply base. Based on state-wide reporting approximately 20.6% of the forestland is certified (SFI - '17 .7%; FSC - 2.5%; and ATF - 0.4%). No FSC certified fiber has been purchased to date.

MREC does not purchase any primary feedstock.

## 5.4 Chain of Custody system

Mohegan Renewable Energy has an adequate management system and documented procedures to determine feedstock compliance to SBP requirements. Mohegan Renewable Energy Crossville Plant (MREC) is certified to the FSC® Chain of Custody Standard.

The organization uses its FSC Chain of Custody certificate as a base for its SBP certificate. All wood, both secondary, and tertiary feedstock, is tracked from the district of origin, through the pellet mill, and to the port. Mohegan Renewable Energy - Crossville (MREC) purchases secondary & tertiary feedstock in the form of hardwood and softwood chips and sawdust through its sole supplier, DeKalb Forest Products Feedstock is brought in via trucks to the mill. The feedstock types received are woodchips, and sawdust. After pelletizing the material is loaded onto trucks that transport it to the port of Guntersville, AL where the pellets are loaded into barges. Then barges are then transported to the Port of Mobile, Alabama for storage. The pellets will be later loaded onto a ship.

The legal point of sale is at the loading of the barge at the Port of Guntersville.

Mohegan Renewable Energy uses a database to gather and control information related to feedstock such as supplier name, logger, scale tickets, fibre type, certification, and district of origin. This database can appropriately track output volumes. Trademark/logo is not used.



## 6 Evaluation process

### 6.1 Timing of evaluation activities

<b>Site Name or Location:</b>	<b>Crossville plant</b>
<b>Audit Activity</b>	<b>Approx. Start Time</b>
<b>Tuesday, July 16, 2019</b>	8:30 AM
Opening meeting	
Review of CoC procedures, products, material accounting, and SBP STD 4	9:00 AM
Review of material balances and records	9:30 AM
Verification of calculations	10:00 AM
Evaluation of trademarks	10:30 AM
Walkthrough of facility	10:45 AM
Staff interviews	<i>During plant walk-through</i>
SBP ST 5, ID5A, ID5B, & ID5C	1:00 PM
End of Day	4:30 PM
<b>Wednesday, July 17, 2019</b>	
Port of Guntersville visit	8:30 AM
Supplier Interviews	10:30 AM
SBP STD 1	1:30 PM
SBP STD 2	3:00 PM
Closing meeting preparation	4:00 PM
Closing meeting and review of findings	4:30 PM
End	
<b>Thursday, July 18, 2019</b>	8:30 AM
Opening meeting and conclusion of outstanding audit activities	
Closing meeting and review of findings	11:45 AM
Saturday, September 14, 2019	2 hours
Review of SBP STD 5	

## 6.2 Description of evaluation activities

The on-site audit included an audit of the GHG, Supply Base Evaluation, Documented Management System, and Chain of Custody. Audit methods consisted of review of documentation, studies, assessments, surveys, websites, emails, databases, invoices, and staff interviews. The site tour and visits were evaluated by review of documentation, monitoring results, observations, and interviews. Scoping by SCS indicated that a total of 2 secondary suppliers should be interviewed during the audit. Crossville Plant has 1 supplier. All raw material is supplied through this contract. This contractor has contracts with sub-suppliers to supply through his contract. Selection of suppliers to interview included the key supplier to Crossville Plant and his largest sub-supplier. Critical control points were witnessed in all areas.

## 6.3 Process for consultation with stakeholders

Stakeholder Consultation by the CB: SCS relies on its Master Stakeholder List, which contains stakeholders that are identified by type, e.g. ENGO, Government/regulatory, Educational/Academic, Industry, Indigenous/Aboriginal/Tribal, etc... This list is categorized by country and state/province at the very least, and for this consultation was filtered to omit any stakeholders that were not geographically relevant to the certificate-holder/applicant's supply base. SCS conducted a stakeholder consultation prior to the audit date. No comments were received or came to the attention of SCS or the auditor.

## 7 Results

### 7.1 Main strengths and weaknesses

Mohegan Renewable Resources manages an efficient energy and greenhouse gas collection system and adequately archives documentation and records such as invoices to support data reporting. The employees involved in the SBP program at Mohegan Renewable Resources Crossville Plant are very knowledgeable and understand their duties and how they relate to SBP. Mohegan Renewable Resources also maintains an effective tracking program for all suppliers of primary and secondary feedstock. Suppliers share a strong commitment to sustainability. Many are certified or in the process of being certified to a forestry standard. The weaknesses are described in section 10.

### 7.2 Rigour of Supply Base Evaluation

Rigor of the Supply Base Evaluation was sufficient to document the findings of low risk and mitigate specified risk to low risk. Use of documented reports and assessments, in combination with local experts, personal knowledge, and stakeholder comments provided a multi-faceted approach for evaluation of each Indicator. The scope statement adequately describes the characteristics of the Supply Base and management systems.

### 7.3 Collection and Communication of Data

The Plant Manager, Fiber Analyst, and consultant are responsible for collecting data on energy, moisture content, material movements and inventories and related records such as ledgers, and invoices from different departments of the organization and external suppliers. Data are centrally compiled in a master spreadsheet. This spreadsheet also contains all necessary calculations.

Plant Manager, Fiber Analyst, and consultant are well versed in all requirements regarding data collection, reporting, and managing comprehensive databases with clearly laid out tables and calculations. All records required during the audit were readily available and the numbers and calculations as reported in the SAR are conclusive and replicable.

### 7.4 Competency of involved personnel

Mohegan Renewable Resources Mississippi LLC's in-house fiber procurement group has local forestry experience and knowledge of ecological and social values associated with the supply base, applicable laws and regulations, business management practices, operation of suppliers, and the local forest resource. The fiber procurement group has many years of experience working in the supply base. A consultant has assisted with the development of their certification systems. Their consultant has extensive experience with system development, implementation, and management.

Mohegan Renewable Resources' management and control systems for SBP are the same as those used to meet the FSC CoC, which have been in place since 2018. Key personnel tasked with implementing

and maintaining the management and control systems relating to SBP compliance are well trained and competent. Mohegan Renewable Resources' assigned management with appropriate skills and competency to implement and execute the management and control systems relating to SBP compliance. Management interviewed during the assessment were found to be knowledgeable of the SBP requirements.

## 7.5 Stakeholder feedback

No stakeholder feedback received.

## 7.6 Preconditions

Major nonconformities which are preconditional to initial certification have been identified and are described in section 10.

## 8 Review of Company’s Risk Assessments

*Describe how the Certification Body assessed risk for the Indicators. Summarise the CB’s final risk ratings in Table 1, together with the Company’s final risk ratings. Default for each indicator is ‘Low’, click on the rating to change. Note: this summary should show the risk ratings before AND after the SVP has been performed and after any mitigation measures have been implemented.*

*Please complete*

SCS assessed risk for the Indicators by evaluating comments received during the stakeholder consultation conducted by both SCS and DBI, reviewing the means of verification DBI developed, interviews with relevant staff, and conducting on-site field audits of forest suppliers.

**Table 1. Final risk ratings of Indicators as determined BEFORE the SVP and any mitigation measures.**

Indicator	Risk rating (Low or Specified)		Indicator	Risk rating (Low or Specified)	
	Producer	CB		Producer	CB
1.1.1	Low	Low	2.3.3	Low	Low
1.1.2	Low	Low	2.4.1	Specified	Specified
1.1.3	Low	Low	2.4.2	Low	Low
1.2.1	Low	Low	2.4.3	Low	Low
1.3.1	Low	Low	2.5.1	Low	Low
1.4.1	Low	Low	2.5.2	Low	Low
1.5.1	Low	Low	2.6.1	Low	Low
1.6.1	Low	Low	2.7.1	Low	Low
2.1.1	Specified	Specified	2.7.2	Low	Low
2.1.2	Specified	Specified	2.7.3	Low	Low
2.1.3	Specified	Specified	2.7.4	Low	Low
2.2.1	Low	Low	2.7.5	Low	Low
2.2.2	Low	Low	2.8.1	Low	Low
2.2.3	Specified	Specified	2.9.1	Low	Low
2.2.4	Specified	Specified	2.9.2	Low	Low
2.2.5	Low	Low	2.10.1	Low	Low
2.2.6	Low	Low			
2.2.7	Low	Low			
2.2.8	Low	Low			
2.2.9	Low	Low			
2.3.1	Low	Low			
2.3.2	Low	Low			



**Table 2. Final risk ratings of Indicators as determined AFTER the SVP and any mitigation measures.**

Indicator	Risk rating (Low or Specified)	
	Producer	CB
1.1.1	Low	Low
1.1.2	Low	Low
1.1.3	Low	Low
1.2.1	Low	Low
1.3.1	Low	Low
1.4.1	Low	Low
1.5.1	Low	Low
1.6.1	Low	Low
2.1.1	Low	Low
2.1.2	Low	Low
2.1.3	Low	Low
2.2.1	Low	Low
2.2.2	Low	Low
2.2.3	Low	Low
2.2.4	Low	Low
2.2.5	Low	Low
2.2.6	Low	Low
2.2.7	Low	Low
2.2.8	Low	Low
2.2.9	Low	Low
2.3.1	Low	Low
2.3.2	Low	Low

Indicator	Risk rating (Low or Specified)	
	Producer	CB
2.3.3	Low	Low
2.4.1	Low	Low
2.4.2	Low	Low
2.4.3	Low	Low
2.5.1	Low	Low
2.5.2	Low	Low
2.6.1	Low	Low
2.7.1	Low	Low
2.7.2	Low	Low
2.7.3	Low	Low
2.7.4	Low	Low
2.7.5	Low	Low
2.8.1	Low	Low
2.9.1	Low	Low
2.9.2	Low	Low
2.10.1	Low	Low

## 9 Review of Company's mitigation measures

### Central Appalachian CBA

1. MREC has contracted with Greener Options, Inc. to assist in the development and implementation of MREC's certification programs. Greener Options, Inc. working with Biological Integrity, LLC attended the three FSC US Controlled Wood Regional meeting held in 20'18. Gary Boyd attended the Appalachian Region meeting on July 19,2018 in Asheville, NC. Boyd actively participated in the discussion of mitigating measures for the HCVs during this meeting.

Gary Boyd, Greener Options, Inc. and Mark Hughes, PhD, Biological Integrity, LLC have reviewed the FSC US Controlled Wood Regional Meeting final report findings with MREC specifications on recommended mitigation measures for the Central Appalachian CBA.

2. MREC will work with suppliers who source wood fiber from this area to educate the suppliers, their loggers and landowners on the conservation values of aquatic biodiversity, threats from poorly implemented forest management activities, and opportunities for conservation through management practices that reduce or eliminate these threats, including but not limited to forest management activities on steep slopes, and practices that will prevent siltation. This education and outreach measure will be documented using MREC-DOC-012 Secondary Supplier Audit Checklists.

3. MREC will engage with and/or provide monetary or in-kind resources to conservation partnerships, organizations or similar entities that are supporting or promoting programs/projects to develop new or augment existing programs within the specified risk area and the MREC's supply area that will: a) result in increased and improved implementation of BMPs with a focus on aquatic biodiversity conservation, and/or b) result in increased access to incentive programs for landowners who restore, maintain or enhance forests in a way that will conserve aquatic biodiversity.

### Southern Appalachian CBA

1. MREC has contracted with Greener Options, Inc. to assist in the development and implementation of MREC's certification programs. Greener Options, Inc. working with Biological Integrity, LLC attended the three FSC US Controlled Wood Regional meeting held in 2019. Mark Hughes, PhD, owner of Biological Integrity, LLC attended the southeast Region meeting on July 31, 20'19 in Atlanta, GA. Hughes actively participated in the discussion of mitigating measures for the HCVs during this meeting.

Gary Boyd, Greener options, LLC., and Mark Hughes, Biological Integrity, LLC have reviewed the FSC US Controlled Wood Regional Meeting final report findings with MREC specifically on recommended mitigation measures for the Southern Appalachian CBA.

2. MREC will work with suppliers who source wood fiber from this area to educate the suppliers, their loggers and landowners on the conservation values of aquatic biodiversity, threats from poorly implemented forest management activities, and opportunities for conservation through management practices that reduce or eliminate these threats, including but not limited to forest management activities on steep slopes, and practices that will prevent siltation. This education and outreach measure will be documented using MREC-OOC-O'12 Secondary Supplier Audit Checklists.

3. MREC will engage with and/or provide monetary or in-kind resources to conservation partnerships, organizations or similar entities that are supporting or promoting programs/projects to develop new or

augment existing programs within the specified risk area and the MREC's supply area that will: a) result in increased and improved implementation of BMPs with a focus on aquatic biodiversity conservation; and/or b) result in increased access to incentive programs for landowners who restore, maintain or enhance forests in a way that will conserve aquatic biodiversity.

### Late Successional Bottomland Hardwoods

1. MREC has contracted with Greener Options, Inc. to assist in the development and implementation of MREC's certification programs. Greener Options, Inc. working with Biological Integrity, LLC attended the three FSC US Controlled Wood Regional meeting held in 2018. Gary Boyd attended the Appalachian Region meeting on July 19, 2018 in Asheville, NC. Boyd actively participated in the discussion of mitigating measures for the HCVs during this meeting.

Gary Boyd, Greener Options, Inc. and Mark Hughes, PhD, Biological Integrity, LLC have reviewed the FSC US Controlled Wood Regional Meeting final report findings with MREC specifically on recommended mitigation measures for Late Successional Bottomland Hardwoods (LSBH).

2. MREC will work with suppliers who source wood fiber from these forest types to educate the suppliers, their loggers and landowners and communicate the social benefits & values of LSBH, threats from forest management activities & related loss of values, and opportunities for conservation through management that restores or maintains LSBH and reduces or eliminates these threats. This education and outreach measure will be documented using MREC-DOC-012 Secondary Supplier Audit Checklists.

### Native Longleaf Pine Systems

1. MREC has contracted with Greener Options, Inc. to assist in the development and implementation of MREC's certification programs. Greener Options, Inc. working with Biological Integrity, LLC attended the three FSC US Controlled Wood Regional meeting held in 2018. Gary Boyd attended the Appalachian Region meeting on July 19, 2018 in Asheville, NC. Boyd actively participated in the discussion of mitigating measures for the HCVs during this meeting.

2. MREC will work with suppliers who source wood fiber from these areas to communicate and educate suppliers, their loggers and landowners on the social benefits and values of NLPS, threats from forest management and related loss of values, and opportunities for conservation through management that restores or maintains NLPS and reduces or eliminates these threats. Communications should recognize the importance of the forest understory and tree to NLPS. This education and outreach measure will be documented using MREC-DOC-012 Secondary Supplier Audit Checklists.

3. MREC will engage with and/or provide monetary or in-kind resources to conservation organizations such as the Longleaf Alliance that are facilitating active, on-the-ground implementation of management activities to restore or maintain existing examples of NLPS, with a goal of long-term conservation of this system within the specified risk area and the MREC's supply area.

### Mesophytic Cove Sites

1. MREC has contracted with Greener Options, Inc. to assist in the development and implementation of MREC'S certification programs. Greener Options, Inc. working with Biological Integrity, LLC attended the three FSC US Controlled Wood Regional meeting held in 2018. Gary Boyd attended the Appalachian Region meeting on July 19, 2018 in Asheville, NC. Boyd actively participated in the discussion of mitigating measures for the HCVs during this meeting.

Gary Boyd, Greener Options, Inc. and Mark Hughes, PhD, Biological Integrity, LLC have reviewed the

FSC US Controlled Wood Regional Meeting final report findings with MREC specifically on recommended mitigation measures for the Southern Appalachian CBA.

2. MREC will work with suppliers who source wood fiber from these forest types to educate the suppliers, their loggers and landowners and communicate the social benefits and values of Mesophytic Cove Sites, how to identify them in the field, threats from incompatible forest management activities, and opportunities for conservation through management that enhances these sites and reduces or eliminates these threats. This education and outreach measure will be documented using MREC-DOC-012 Secondary Supplier Audit Checklists.

3. MREC will engage with and/or provide monetary or in-kind resources to conservation organizations such as the Longleaf Alliance that are facilitating active, on-the-ground implementation of management activities to restore or maintain existing examples of NLPS, with a goal of long-term conservation of this system within the specified risk area and the MREC's supply area.

#### IUCN Centre for Plant Diversity

1. MREC will work with suppliers who source wood fiber from these areas to communicate and educate suppliers, their loggers and landowners on the values of granite outcrops, threats from forest management and related loss of values, and opportunities for conservation through management that restores or maintains granite outcrops and reduces or eliminates these threats. Communications should recognize the importance of granite outcrops. This education and outreach measure will be documented using MREC-DOC-012 Secondary Supplier Audit Checklists.

#### Forestland Conversion

1. MREC is developing and implementing binding written agreements with its feedstock suppliers that:

- mitigate the risk that material supplied originates from forest areas converted into plantation or non-forest use; or
- assure that if some conversion has occurred, that material supplied originates from limited and legal sources of conversion (e.g., conversion that results in conservation benefits, publicly approved changes in zoning in urban areas, etc.) and does not come from sources where the conversion threatens High Conservation Values.

2. MREC has contracted with Greener Options, Inc. to assist in the development and implementation of MREC'S certification programs. Greener Options, Inc. working with Biological Integrity, LLC attended the three FSC US Controlled Wood Regional meeting held in 2018. Gary Boyd attended the Appalachian Region meeting on July 19, 2018 in Asheville, NC. Boyd actively participated in the discussion of mitigating measures for the HCVs during this meeting.

Gary Boyd, Greener Options, Inc. and Mark Hughes, PhD, Biological Integrity, LLC have reviewed the FSC US Controlled Wood Regional Meeting final report findings with MREC specifically on recommended mitigation measures for forestland conversion.

3. MREC will work with suppliers who source wood fiber from these counties to communicate and educate suppliers, their loggers and landowners on the social benefits of keeping forests as forests, and the value-enhancing alternatives to conversion and opportunities for the maintenance of forests. This education and outreach measure will be documented using MREC-DOC-012 Secondary Supplier Audit Checklists.

4. MREC will also maintain membership in the Alabama Forestry Association to keep abreast of forestry

issues within MREC's supply area. Below are some sources of information used to educate suppliers and their loggers, and landowners of forest conservation.

Effectiveness of mitigation measures will be reviewed annually through a review of risk in identified areas and any changes and through annual supplier audits. The BP plans to review results of partnerships developed and implemented with conservation organizations.

## 10 Non-conformities and observations

Identify all non-conformities and observations raised/closed during the evaluation (a tabular format below may be used here). Please use as many copies of the table as needed. For each, give details to include at least the following:

- applicable requirement(s)
- grading of the non-conformity (major or minor) or observation with supporting rationale
- timeframe for resolution of the non-conformity
- a statement as to whether the non-conformity is likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks.

<b>NC number 1</b>	<b>NC Grading: Major</b>
<b>Standard &amp; Requirement:</b>	Standard 5, ID 5B, 2.1.1 a
<b>Description of Non-conformance and Related Evidence:</b>	
SAR has not been completed prior to audit. Feedstock groups and data is not included in SAR and feedstock percentages and groups reported are inconsistent across the SAR, Static Biomass Profiling Datasheet (SBPD) and SBR. Primary feedstock: SAR: 56%, SBPD: 80%. The SBR states that no primary feedstock is purchased (section 2.1, 2.3, 2.5, etc.). Secondary feedstock: SAR: 44%, SBPD: 20%. Tertiary feedstock: SAR: none; SBPD: none, SBR mentions that tertiary feedstock is being purchased (sections 2.1, 2.2, 2.3, 2.5, 5)	
<b>Timeline for Conformance:</b>	Prior to (re)certification
<b>Evidence Provided by Company to close NC:</b>	SAR has been completed and SBR has been updated.
<b>Findings for Evaluation of Evidence:</b>	SAR has been completed with all necessary sections filled out correctly and SBR was revised so that feedstock types are consistent across SAR, SBR, and SBPD.
<b>NC Status:</b>	Open

<b>NC number 2</b>	<b>NC Grading: Major</b>
<b>Standard &amp; Requirement:</b>	SBP Standard 5, ID 5C, 3.1.1, 3.1.3, 4.1.1, 4.1.2, 4.2.1
<b>Description of Non-conformance and Related Evidence:</b>	
Static Biomass Profiling Data sheet not made available to auditor.	
<b>Timeline for Conformance:</b>	Prior to (re)certification

<b>Evidence Provided by Company to close NC:</b>	Submitted a complete SBPD
<b>Findings for Evaluation of Evidence:</b>	SBPD to be found complete and in conformance
<b>NC Status:</b>	Closed

<b>NC number 3</b>	<b>NC Grading:</b> Major
<b>Standard &amp; Requirement:</b>	SBP Standard 5, ID 5B, 5.4.1
<b>Description of Non-conformance and Related Evidence:</b>	
Metrics for fuel use in the SAR do not match calculations from spreadsheet of invoices.	
<b>Timeline for Conformance:</b>	Prior to (re)certification
<b>Evidence Provided by Company to close NC:</b>	A revised SAR and energy data spreadsheet was submitted to SCS.
<b>Findings for Evaluation of Evidence:</b>	The revised SAR includes complete and correct calculations and underlying databases are in agreement with the values reported in the SAR
<b>NC Status:</b>	Closed

<b>NC number 4</b>	<b>NC Grading:</b> Observation
<b>Standard &amp; Requirement:</b>	SBP Standard 1, 2.7
<b>Description of Non-conformance and Related Evidence:</b>	
<p>The evidence presented is not consistent with the means of verification. Means of verification presented for criterion 2.5.2 only include the organizations management system, while the evidence reviewed also includes third party sources such as Best Management practices and Logger training programs. The means of verification do not state that such sources have been reviewed. The evidence presented is linked to the MoV such as that the evidence is a concrete example of an MoV e.g. BMP is an MoV and evidence would be the concrete BMP for the state of Georgia. For criterion 2.4.1 the MoV listed only contain the organization’s own management system, though the evidence cited shows that more means of verification have been used. Criterion 2.3.2: MoV do not include third party resources such as logger training programs. Criterion 2.1.1: The description of the finding includes sources of information that are not listed in the MoV or evidence section. Examples include Critical Ecosystem Partnership Fund biodiversity, WWF ecoregions, etc.2.1.2: WRI, GFF Frontier Forests, WWF are mentioned in findings, but not in MoV and evidence. Mov do not include FSC US NRA and MREC-DOC-0052.2.1, 2.2.2: several pieces of evidence are not listed in the MoV, such as professional logger databases, BMPs, USGS soil map database, etc.</p>	
<b>Timeline for Conformance:</b>	Other

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

<b>NC number 5</b>	<b>NC Grading: Major</b>
<b>Standard &amp; Requirement:</b>	SBP Standard 2, 16.3
<b>Description of Non-conformance and Related Evidence:</b>	
<p>The organization has not included a plan to evaluate mitigation measures as to their effectiveness. Mitigation measures describe the actions that are going to be implemented, but there is no indication of how the BP wants to verify that:</p> <ul style="list-style-type: none"> <li>•Mitigation measures are implemented correctly</li> <li>•Mitigation measures are effective in reducing the specified risk to low risk.</li> </ul> <p>The BP states in SBR Annex I that supplier outreach and education will be documented in secondary supplier audit checklists, but it does not indicate how often these audits happen and if they include field verification and what happens in case suppliers cannot adequately implement mitigation measures. The BP intends to provide monetary or in-kind resources to conservation organizations. This in itself is a good measure, but here it is not clear how the outcome is monitored and how this mitigation measure is evaluated to be effective. This is not sufficiently described in both SBR and SBR Annex I</p>	
<b>Timeline for Conformance:</b>	Prior to (re)certification
<b>Evidence Provided by Company to close NC:</b>	A revised SBR and SBR Annex I was submitted.
<b>Findings for Evaluation of Evidence:</b>	The revised SBR now lays out a clear plan to verify the effectiveness of mitigation measures for all specified risks in the supply base.
<b>NC Status:</b>	Closed



## 11 Certification decision

**Based on the auditor's recommendation and the Certification Body's quality review, the following certification decision is taken:**

<b>Certification decision:</b>	Certification approved
<b>Certification decision by (name of the person):</b>	Sebastian Häfele
<b>Date of decision:</b>	12/Nov/2019
<b>Other comments:</b>	<i>Click or tap here to enter text.</i>