



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

First Surveillance Audit

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

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

## *Document history*

*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*

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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: Maggie Schwartz; info@scsglobalservices.com

Current report completion date: 12/Nov/2020

Report authors: Kyle Meister

Name of the Company: Mohegan Renewable Energy, LLC, 13 Crow Hill Road, Uncasville, CT 06382

Company contact for SBP: Gerry Amenta

Certified Supply Base: Not applicable

SBP Certificate Code: SBP-04-50

Date of certificate issue: 31/Oct/2019

Date of certificate expiry: 30/Oct/2024

This report relates to the First Surveillance Audit

## 2 Scope of the evaluation and SBP certificate

Trade of SBP-compliant pellets with point of purchase upon loading of pellets from BP's pellet mills onto barges, covering transportation to and aggregation at the Port of Mobile, AL, and finally the point of sale that is loading onto customer's vessel at the Port of Mobile, AL. The scope of the certificate does not include Supply Base Evaluation. It also does not cover the communication of Dynamic Batch Sustainability data.

It also covers a Supply Base Evaluation for sourcing feedstock from: N/A.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
The scope includes communication of Dynamic Batch Sustainability Data.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

As already stated on the cover page and the overview page, the evaluation was a/an:	<input type="checkbox"/> Evaluation audit	<input checked="" type="checkbox"/> Surveillance audit
	<input type="checkbox"/> Re-Evaluation audit	<input type="checkbox"/> Other: Describe
The scope of this audit included a review of procedures (e.g., data collection, chain of custody, Due Diligence System (DDS), etc.), documentation (e.g., risk assessments), records (e.g., supplier contracts, SAR, SREG), and databases to ensure the organization's management system is appropriate to ensuring conformance to applicable SBP Standards cited in section 4.1.		
Other audit methods that may have been used include field audits, inspection of production facilities (remotely and/or onsite), and interviews with relevant staff, supplier representatives and stakeholders/rightsholders.		

### 3 Specific objective

The specific objective of this evaluation was to confirm that the Biomass Producer's management system is capable of ensuring that all requirements of specified SBP Standards are implemented over scope of certification.

If applicable, the following *pre-audit activities* were conducted: ☐ pre-assessment; ☐ site visits ☒ N/A

The following Critical Control Points (CCPs) were identified and evaluated (edit list as appropriate and describe how the organization controls each point and how it was evaluated). Note that you may identify other CCPs for a particular client which you should also describe in the report:

CCP	Description, including how evaluated by SCS
Processes for procurement and processing, transport and storage	Assessed through supplier documentation with feedstock properties (trip/scale tickets), incoming loads database, and DTS transaction records from supplier pellet mills.
Volume accounting method	Review of material accounting records; spreadsheets with total volume of pellets produced; DTS transaction records from supplier pellet mills and staff awareness assessed through interviews.
Documentation of transactions	Review of DTS reports to confirm transactions sold with an SBP claim.
Energy data collection and reporting	Review of SREG.

## 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

- ☐ Name of SBP-endorsed Regional Risk Assessment (RRA):
- ☒ N/A, no SBP-endorsed RRA.

# 5 Description of Company, Supply Base and Forest Management

## 5.1 Description of Company

Mohegan Renewable Energy, LLC (MRE) purchases pellets from its sister pellet mill companies located in Crossville, AL, Jasper, TN, and Quitman, MS. Ownership of pellets from the Crossville and Jasper Plants is taken when they are loaded onto barges at the Port of Gadsden, AL. These pellets are barged to the Port of Mobile, AL, where they are stored on the barges until loading on the customer's vessel. Ownership of the pellets produced by the Quitman Plant is taken at the Port of Mobile, AL, when they are loaded on barges. They are stored on barges until loading onto the customer's vessel. Title to the pellets is transferred to the customer when loaded on their vessel.

The organisation is a legal entity located in: Connecticut, USA

The following descriptions and activities apply to the organisation:

Biomass activity	Feedstock sourced <input checked="" type="checkbox"/> NA, trader only	Feedstock claims* <input checked="" type="checkbox"/> NA, trader only	Relationship to other SBP-certified biomass producers/traders
<input type="checkbox"/> Pellet producer & trader <input type="checkbox"/> Stationary/ <input type="checkbox"/> Mobile Woodchip producer & trader <input checked="" type="checkbox"/> Pellet trader <input type="checkbox"/> Woodchip trader	<input type="checkbox"/> Primary <input type="checkbox"/> Secondary <input type="checkbox"/> Pre/ <input type="checkbox"/> Post-consumer tertiary	<input type="checkbox"/> FSC 100%/Mix Credit <input type="checkbox"/> FSC Mix x% <input type="checkbox"/> 100% PEFC <sup>1</sup> /Volume Credit <input type="checkbox"/> SFI Forest Management or 100% <input type="checkbox"/> ATFS <input type="checkbox"/> Other FSC, SFI or PEFC (e.g., FSC Controlled Wood):	<input type="checkbox"/> NA, not linked via ownership and/or agreement to other SBP-certified entities; or <input checked="" type="checkbox"/> Organisation is linked to other <u>SBP-certified</u> entities via ownership or agreement: 2 other pellet producers and 1 trader certificate under Mohegan Renewable Energy

\*This refers to feedstock claims that the BP may receive per the scope of its Chain of Custody (COC) certificate(s) and not necessarily to claims actually received during the audit period. Equivalents to FSC Controlled Wood or PEFC Controlled Sources must also qualify per an SBE and/or RRA to qualify as SBP-compliant feedstock. See section 5.4 for more details.

Feedstock is sourced from the following regions by administrative unit: Country(ies)	N/A – trader only
States/Provinces/Territories	
Number of counties sourced from in case only a portion of an administrative unit is in the SB	

<sup>1</sup> PEFC recognizes SFI Forest Management, American Tree Farm Standard (ATFS), and CAN/CSA Z809 SFM as 100% PEFC in North America. Other duly recognized standards may be found here: <https://www.pefc.org/> (e.g., CERFLOR Brazil, CERFOAR Argentina, CertforChile, PEFC Estonia, PEFC Latvia, PEFC Lithuania, PEFC Uruguay, Responsible Wood Australia, New Zealand NZFCA, etc.).

## 5.2 Description of Company's Supply Base

N/A – trader.

## 5.3 Detailed description of Supply Base

N/A – trader.

## 5.4 Chain of Custody system

As applicable, all material is subject to the organization's COC procedures for sourcing certified and non-certified material. The organization sources material from certified sources under its valid COC certificate(s) per the following systems: ☒ FSC ☐ PEFC and/or ☐ SFI.

Pellets from sister companies are traded to the BP via SBP COC protocols, as confirmed via review of DTS transaction reports.

## 6 Evaluation process

### 6.1 Timing of evaluation activities

<b>Auditor name:</b>	Kyle Meister	<b>Auditor role:</b>	Lead auditor
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A. Number of days spent on-site for evaluation:	1.5
B. Number of auditors participating in on-site evaluation:	1
C. Number of days spent by any technical experts (in addition to amount in line A):	0
D. Additional days spent on preparation, stakeholder consultation, and follow-up:	0
<b>E. Total number of person days used in evaluation (A * B + C + D):</b>	<b>1.5</b>

<b>Date and Time of Audit:</b>	Opening Meeting: 11 September 2020 @ 9:00am EST; and Closing Meeting: 12 November 2020 @ 3:00pm	
<b>Audit Activity</b>	<b>Items to Review / Actions</b>	<b>Approx. Start Time</b>
Opening meeting	Introductions, auditor review of audit scope, audit plan and intro/update to SBP, FSC, and SCS standards and protocols, client description of organization	2 hrs.
Review of previous nonconformities	Review of evidence of corrective actions taken by organization since previous audit (records, documents, pictures, etc.)	
Review of CoC/SBP procedures, products and material accounting	Written procedures, work instructions, feedstock description (see ID 5B section 4), product group list, accounting system (transfer, percentage or credit; physical separation, percentage method)	4 hrs.
Review of material balances and records	Auditor-selected sample of the following: material tracking system, summary of purchases and sales, invoices, shipping documents, training records, outsourcing agreements, other applicable SBP/CoC systems, procedures and records, tracebacks from certified outputs to eligible inputs	
Verification of calculations	Auditor-selected sample and verification of calculations for conversion factors, percentage claims, and credit accounts, as applicable	
SBP ST 5, ID5E	Review of GHG data collection	2 hrs.
Staff interviews	Interviews with appropriate number and diversity of staff to assess knowledge of procedures related to their position	2 hrs.
Closing meeting preparation	Auditor takes time to consolidate notes and review audit findings for presentation at closing meeting	1 hr.
Closing meeting and review of findings	Convene with all relevant staff to summarize audit findings, review identified nonconformities, and discuss next steps	1 hr.
End		

### 6.2 Description of evaluation activities

Refer to the audit itinerary above. For all SBP evaluations, SCS may collect evidence using a combination of direct observation, document and record review, and interviews with stakeholders, rightsholders and the organization's personnel & service providers. As reviewing all operations would be cost-prohibitive, SCS implements sampling techniques to ensure that all CCPs are assessed during evaluations. When relevant, other areas and locations are sampled during sequential audits to ensure that different aspects of the organization's control systems are evaluated. If a pre-evaluation visit was conducted, results are described below.

☒ N/A, no pre-evaluation visits.

☐ Results of any pre-evaluation visits:

## 6.3 Process for consultation with stakeholders

N/A – trader.

## 7 Results

### 7.1 Main strengths and weaknesses

Strengths	Weaknesses
Mohegan Renewable Resources was well organized and has a good system for its certification. For details on weaknesses please refer to the nonconformity section.	Refer to section 10.

### 7.2 Rigour of Supply Base Evaluation

☒ N/A, no Supply Base Evaluation (SBE) conducted.

### 7.3 Collection and Communication of Data

The BP is fully committed to collecting and reporting all greenhouse gas emissions data deemed necessary by its customer and regulators. The company uses software to collect and communicate the data. Information is made available to customers via SBP's DTS.

### 7.4 Competency of involved personnel

Monitoring and managing of Mohegan Renewable Resources is a combined effort of internal team members and external parties. Persons involved are very competent for the development, on-going monitoring, and communication of data.

### 7.5 Stakeholder feedback

N/A – trader.

### 7.6 Preconditions

☒ No preconditions were issued.

☐ Preconditions were issued, which remain *open* as described in the Major NCRs noted in section 10.

☐ Preconditions were issued, all of which the organization *closed* as described in the Major NCRs noted 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.*

☒ N/A, no SBE conducted.

## 9 Review of Company's mitigation measures

☒ N/A, no mitigation measures.

## 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.*

None identified.

## 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>	Theodore Brauer
<b>Date of decision:</b>	22/Jan/2021
<b>Other comments:</b>	<i>Click or tap here to enter text.</i>