



SCS Global Services Evaluation of Plantation Energy Australia Pty Ltd 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

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1 Overview

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Current report completion date: 05/Aug/2020

Report authors: Ciara McCarthy

Name of the Company: Plantation Energy Australia Pty Ltd

Company contact for SBP: Richard Allen

Certified Supply Base: South west Western Australia

SBP Certificate Code: SBP-04-56

Date of certificate issue: 11/Sep/2020

Date of certificate expiry: 10/Sep/2025

This report relates to the Main (Initial) Audit

2 Scope of the evaluation and SBP certificate

Plantation Energy Australia Pty Ltd is a single site certificate for the production of wood pellets used in energy production from certified feedstock sourced in south-west Western Australia and transport to the Port of Albany, Western Australia. This certificate does not include a Supply Base Evaluation and does not include the communication of Dynamic Batch Sustainability Data.

The scope of this main evaluation audit included an assessment to the conformance of procedures, documentation, records and databases to ensure the organization's management system is appropriate to ensuring conformance to SBP Standards 2, 4, and 5. Other audit methods used were virtual site walkthrough of pellet mill and interviews with relevant staff. The evaluation included a review of documentation such as the Supply Base Report including the Risk Assessment, PEFC DDS, supplier contracts and SAR, among others.

3 Specific objective

The specific objective of this initial evaluation audit was to confirm the Biomass Producer's management system is capable of ensuring that all requirements of SBP Standard, 2: Verification of SBP-compliant Feedstock, 4: Chain of Custody, and 5: Collection and Communication of Data (including Instruction Documents 5A: Collection and Communication of Data, 5B: Energy of GHG Data, 5C: Static Biomass Profiling Data, 5D: Dynamic Batch Sustainability Data) are implemented across the entire scope of certification. This was achieved by review of risk assessments, procedures, GHG and other data. Interviews with key personnel and stakeholders were also conducted.

The following critical control points were identified and evaluated:

*Feedstock procurement: All wood delivered to the mill is tracked in a centralized system. Prior to delivery of round-wood (temporary basis), in-woods chips, residual chips and saw dust (planned) to the scale house, the owner name, district of origin (Lat/Long), product type, etc. are obtained from the supplier. All vendors are required to execute a Supplier Agreement with specific terms and conditions.

*Storage and processing: BP processes feedstock from suppliers into wood pellets by drying, hammering, and extruding into pellets and the bark is used as boiler fuel to dry feedstock. The conversion factors used to allocate the Roundwood, thinning, in-wood chips into pellets are reasonable.

*Volume Accounting: The procedures detail the process to properly maintain the volume credit spreadsheet, with provisions for subtracting certified product sold and for carrying only the past 12 months of credits, in accordance with PEFC standards.

*Outgoing transactions: Invoices will be issued, and all outgoing transactions of SBP-certified and/or controlled biomass will be recorded in the DTS.

*Energy data collection and reporting: The organization developed and maintains databases to record data values and calculate energy data as required by Standard 5 and keeps records that substantiate the data. Data values used will be based on budgeted volumes for feedstock and engineering design values for energy and production.

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

The Plantation Energy wood pellet production facility was constructed in 2008, as a collaborative venture designed to provide a domestic processing option for pulplogs. The plant now provides a local market for low grade stemwood products that are commonly treated as waste residues in harvested areas. It services both industrial scale and small forest grower markets and has potential to divert other waste wood streams such as post-consumer feedstock.

Feedstock for the mill is currently sourced from hardwood and softwood plantations grown in south-west Western Australia. In 2019-20 Plantation Energy also processed thinnings sourced from public native Karri forests in a short term feedstock trial. The supply base spans from Perth to Esperance, from forests grown in the bioregions of Swan Coastal Plain, Jarrah Forest, Warren and Esperance Plain. Feedstock is preferentially sourced within a 200km radius of the processing plant near Albany.

5.2 Description of Company's Supply Base

In 2019-20, approximately 85% of the mill's feedstock was sourced from plantations managed by the Forest Products Commission (FPC), a WA State government trading enterprise. Approximately 3500 tonnes of chiplogs (4% total feedstock) were also sourced from FPC from one native forest thinning couple on a short term trial by arrangement in early 2020.

The remaining 11% of feedstock in 2019-20 was sourced from small, privately owned standing plantation resources purchased by Plantation Energy from the grower.

5.3 Detailed description of Supply Base

Feedstock supplies

In 2019-20, approximately 85% of the mill's feedstock was sourced from plantations managed by the Forest Products Commission (FPC), a WA State government trading enterprise. Approximately 3500 tonnes of chiplogs (4% total feedstock) were also sourced from FPC from one native forest thinning coupe on a short term trial arrangement in early 2020. This trial was successful, demonstrating native Karri forest thinnings could be used as a feedstock in the future.

The remaining 11% of feedstock in 2019-20 was sourced from small, privately owned standing plantation resources purchased by Plantation Energy direct from the grower.

Forest Products Commission (FPC) Feedstock from Softwood Plantations

General description of FPC softwood plantation resources and industry

Plantation Energy currently sources plantation grown Radiata Pine (*Pinus radiata*) and Maritime Pine (*P. pinaster*) stemwood from FPC. FPC feedstock products include:

- Industrial Wood and Woody Biomass arising from the FPC harvesting operations on public land and freehold land held by FPC, and
- Industrial Wood harvested from FPC sharefarms by Plantation Energy contractors.

FPC manages timber production from 50,000 hectares of softwood plantation on public land in south-west WA.

The softwood plantations comprise 80% Radiata Pine with the rest predominantly Maritime Pine. FPC also manages timber production from an additional 28,000 hectares of Radiata Pine and Maritime Pine plantations under sharefarm arrangements with private landholders.

State owned plantations are predominantly located within and around areas of consolidated public native forest landscapes between Perth and Manjimup. Sharefarmed plantations tend to be situated within agricultural landscapes extending from north of Perth south to Albany and east to Esperance.

All of Plantation Energy's current softwood supply from FPC is sourced from sharefarmed plantations around Albany. These sharefarms operate under a Profit A Prende which commits both FPC and the landowner to the agreement for a single rotation of 30 to 40 years depending on the species.

Softwood species are grown primarily to supply a large local sawmill, a particleboard plant and a laminated veneer lumber plant and situated near Bunbury and Perth respectively. This industry employed over 800 people and had a gross regional product of \$274 million in 2015-16 to the point of primary processing.

The WA government is currently expanding the softwood plantation estate to ensure continuing supply of resources to its local processors. In 2018-19 FPC acquired 520ha of land and entered agreements over 180ha of private land to establish new plantations. The new estate is located within the economic haulage distance of Bunbury, where two of the major processors are situated. Sharefarms near Albany are either being re-established as Blue Gum (*Eucalyptus globulus*) plantations or reverted to agriculture. This decision is entirely up to the landowner, as FPC has no control over the site after harvest.

FPC softwood plantation management regimes

All FPCs softwood plantation inputs from the Albany district are first rotation Radiata Pine or Maritime Pine. All FPCs softwood plantations are certified under the Responsible Wood Standard AS4708-2013, which specifies the forest manager must be able to demonstrate it was not responsible for the conversion of native forest to plantations after 31 December 2006. As FPC manages plantations on public land and plantations established by the State under sharefarming agreements, it can be assumed that no logs sourced from FPC plantations resulted from native forest conversion.

The Radiata Pine plantations were established between 1987 to 1993 and are grown on sites with an average annual rainfall of 600mm or more. These stands were planted densely at a stocking of 1500 stems per hectare to minimise branch size and promote good form. Commercial thinnings occurred at ages 15 to 20 years (first thinning) and 23 to 28 years (second thinning) to optimise growth. Mid-rotation fertiliser was applied where warranted on the basis of soil analysis. The target age of clearfell for these stands is 28 to 34 years. Feedstock to Plantation Energy from FPC's Radiata Pine plantation is from a combination of final fell and second thinnings.

The Maritime Pine plantations were planted between 1996 and 2009 on sites receiving between 450 and 600mm rainfall per annum. The same silviculture regime applies as for Radiata Pine, except that due to slower growth rates, all thinnings and final fell are planned to occur several years later. First thinning is planned to occur between age 15 and 23, second thinning from age 28 to 30 and final fell at age 35. Plantation Energy now receives first thinnings from these plantations.

Routine plantation management activities such as fire management, invasive species and disease control are conducted by FPC or the land owner for the duration of the Profit a Prende as defined in the agreement.

Prior to undertaking disturbance operations, FPC conducts a comprehensive planning process to assess potential risks to environmental, economic, social and heritage values and ensure legal requirements are met. Values assessed include threatened and priority species as defined by the Department of Biodiversity, Conservation and Attractions (DBCA) at a State level, and the Environment Protection and Biodiversity Conservation (EPBC) Act 1999 at a national level.

Operations on public land must be approved by the DBCA. Planning for disturbance operations on sharefarms is approved internally by FPC senior management.

FPC provide a summary instruction and map to each contractor working on their site, which includes any special management actions and requires adherence to the Code of Practice for Timber Plantations in Western Australia, 2014. The Code specifies management actions to prevent disturbance to wetlands and minimising movement of soil and chemicals into wetlands. Wetlands and watercourse locations are shown on harvesting maps in relation to plantation boundaries.

FPC softwood plantations are harvested with ground based mechanical harvesters. Logs are moved to roadside collection areas using forwarders where they are segregated by product grade. FPC prioritise recovery of sawlog from stems of 16cm small end diameter upwards using harvester optimisation technology. Plantation Energy receive Industrial Wood and Woody Biomass from these operations, which is any lower grade stemwood material from the small end breaking point (approximately 4cm diameter) upwards that is unsuitable for sawlog. Plantation Energy contractors convert these co-products to woodchip at roadside processing areas using an in-field chipper.

The first thinning operations are conducted by Plantation Energy using their contractors. This is done with mechanical feller bunchers and skidders moving the product to roadside for whole tree chipping. There are generally no higher grade stemwood products derived from these operations due to the small size of the trees.

FPC Feedstock from native forests on State Forest and Timber Reserve

General description of FPC Karri forest resources and industry

FPC manages harvesting and regrowing of approximately 180,000 hectares of native Karri forest on public land in the higher rainfall areas of south western WA stretching from Nannup to Walpole. These forests are managed by the DBCA under the principles of ecologically sustainable forest management, to protect and maintain biological diversity, ecosystem health and vitality, soil and water resources, productive capacity, natural and cultural heritage and socio-economic benefits. Management strategies are specified in the Forest management plan 2014-2023, Conservation Commission of Western Australia, December 2013.

FPC includes in its mission statement 'promoting innovation in forest management and local value-adding of timber resources .' Target markets for native forest products include furniture and joinery timber, structural timber, flooring and decking, cladding and residues for silicon, energy, pulp and paper. There are approximately 15 primary processors of native forest products located across south west WA from Dwellingup to Albany. These are primarily sawmills, utilising larger sawlogs from final felling operations. FPC is also working on initiatives to establish processing facilities for engineered wood products and veneer. FPC's focus is on delivering industry and community benefits to regional WA. In 2015-16, the contribution of native forest industry to the Gross Regional Production was \$104 million .

FPC's operations within public native forests are subject to regulatory oversight by DBCA, involving approval of disturbance plans as is required for softwood plantations and compliance audit programs. Operations must be managed in accordance with a range of silvicultural procedures and guidelines administered by DBCA. The Karri forests are certified under the Responsible Wood program.

FPC Karri forest management regimes

Karri Forests include stands of pure Karri (*E. diversicolor*) and mixtures of Karri, Marri (*Corymbia calophylla*), Jarrah (*E. marginata*) or Blackbutt (*E. pilularis*). FPC outlines its management practices for these forest types in the Karri forest management plan, 2020. The plan describes a silvicultural regime which may involve several thinning operations from age 25 onwards before final fell at around age 100 depending on stand condition. Karri is a primary colonising species, which requires absence of competition for successful regeneration. It is typically harvested in coupes of up to 40 hectare size using mechanical harvesters with optimising technology and wheeled skidders or forwarders, which extract timber to the roadside. Regeneration is generally achieved through a post-harvest burn, which provides a suitable seedbed to initiate germination of Karri.

Plantation Energy's trial of native forest feedstocks was sourced from the Sutton block in Sutton State Forest located between Pemberton and Walpole. The mixed Karri forest thinned by FPC in the Sutton block is 31 to 37 year old native forest regrowth. Logs for laminated veneer lumber are the priority from thinning operations, with chiplog for pulping or biomass produced from lower grade stemwood as a co-product.

Whilst timber harvesting has been conducted in the native forests of south west WA since the 19th century, there are still some areas of ecologically mature forests in the region, where evidence of disturbance (excluding fire) is now negligible. These forests are considered old growth. The Forest management plan 2014-2023, specifically states that all old growth forests are protected in formal or informal reserves and thus not subject to timber harvesting operations . Thus products from primary forests are not available. Streams, rivers, wetlands, lakes and other water bodies are also recognised in the forest management plan as critically important to biodiversity and ecosystem function. The plan specifies that informal reserves be established to protect all such values. Thus biomass feedstock sourced from native Karri forests does not originate in wetlands. Other values protected through formal and informal reserves include significant biodiversity values and heritage sites.

Small privately owned plantations

Since the 1980's there have been various initiatives to encourage the development of plantation forests on farmlands in south-west WA. These ventures were initially aimed at extending existing government owned softwood plantations in areas that did not require conversion of native forests and researching plantation alternatives to native forest sawlog production. In the 1990's the WA government began research to develop short rotation eucalypt plantations for woodchip products. Drivers for this initiative included amelioration of salinity by lowering water tables and income diversification for farmers. The success of this work led to a substantial expansion in the 2000s of the plantation estate on farmlands under Managed Investment Schemes. Blue Gum plantations established on farmland now comprise the majority of harvesting activity. They are almost entirely managed by large forest growers and supply the bulk of hardwood woodchip exports. Unfortunately the chemical composition of wood fibre from this resource renders it unsuitable as a major feedstock for wood pellets.

Plantation Energy does however provide a market for softwoods and other hardwood species produced by small growers as small woodlots and shelterbelts. A recent report to FPC estimates there is a privately owned softwood estate of approximately 3000ha in the region. There is minimal data about the nature and extent of hardwood farm forestry resources at a regional scale.

Forest management practices on small grower plantations

Small privately owned forests used as feedstock for the mill range in extent from shelterbelts up to woodlots of 40 hectares in area. They are generally set within cleared farmland and are largely experimental plantings from the early 1990s through to the late 2000s. Various species are grown including Radiata Pine, Maritime Pine, Blue Gum, Karri, Sydney Blue Gum (*C. botryoides*), Blackbutt (*E. pilularis*), Yellow Stringybark (*E. muelleriana*), Lemon Scented Gum (*E. citriodora*), Flooded Gum (*E. grandis*) and Blackwood (*Acacia melanoxylon*). Some plantations have been thinned. All feedstock inputs to Plantation Energy are from final fellings of plantations between ages 10 and 30 years.

Due to the young age, small scale and generally low level of management inputs, the small grower plantations do not produce enough sawlog to take to market. The volume of potential sawlog available from these stands to date has been less than the 25 tonne minimum volume for safe and viable transport. Additionally, there are no softwood sawmills located in the Albany area, necessitating very long hauls to market.

As with FPC, Plantation Energy's contractors follow the guidance within the Code of Practice for Timber Plantations in Western Australia, 2014. Prior to harvest, Plantation Energy engages a contractor with forest planning expertise to complete a Pre-harvest Checklist. The stand characteristics, plantation age and potential to have caused conversion of native forest to plantation, site values, constraints (including any controversial sources) and recommendations to address any constraints are documented in this process. The Pre-harvest Checklist informs the development of a Property Harvest Plan and operations map. Plantation Energy review the checklist and Property Harvest Plan prior to harvest to ensure it meets requirements for controlled sources inputs to its PEFC chain of custody and now the SBP and legislative requirements for biomass feedstock.

Plantation Energy's harvesting contractor uses a feller buncher to harvest the trees, a skidder to move the stems to a landing, and a flail and chipper to convert the stems to woodchip. The woodchip is then trucked to the biomass plant.

The future use of the harvested farm forestry sites is dependent on the decisions of the landowner. Some harvested areas are being reverted to agriculture, whilst others may be re-established as plantations. This trend is consistent with the approach of large certified forest management entities. The loss of some plantation sites to agriculture is to be expected as many of the sites were experimental and forest productivity and market factors driving economic viability were unknown at the time of establishment.

Presence of any CITES or IUCN species.

In Australia, CITES and IUCN requirements are enforced under the EPBC Act . CITES species are present in WA but do not include the species sourced as feedstock to the plant.

WA, like other Australian States, runs its own classification system for threatened species and ecosystems which is administered by DBCA. DBCA provide ready public access to information on the location of threatened species including those protected under international agreements via the NatureMaps interactive mapping system . Naturemaps searches, and where necessary ground based surveys, are conducted as part of the FPC disturbance planning approval system. Plantations, regardless of whether they are softwood or hardwood, do not generally provide habitat for threatened species in WA. This is now recognised within the FSC® National Risk Assessment for Australia, Version 1-0, 2019 (Australian NRA), which removed unspecified risks to threatened species in WA plantations. Native forests and woodlands do provide habitat for threatened species, however these are subject to careful checks and management protections such as informal reserves.

5.4 Chain of Custody system

Plantation Energy has an adequate management system and documented procedures to determine feedstock compliance to SBP requirements. The organization uses its PEFC Chain of Custody certificate as a base for its SBP certificate. All feedstock, is tracked from the place of harvesting, through the pellet mill, and to the port.

Feedstock is brought in via trucks to the pellet facility. After pelletizing the material is loaded onto a truck to the Port of Albany and loaded onto a ship. Plantation Energy load directly on to the vessel and there is no storage at the port. The legal point of sale is at the loading of the vessel, GHG information is gathered to that point. Plantation Energy uses detailed Excel sheets to gather and control information related to feedstock, such as supplier name, scale tickets, input type (sawdust / shavings), certification.

The moisture content is analyzed per shift. Weight scales are available at different stages in the process, among others the conveyor belts linked to the sawmill. Truck tickets available for all truck loads transported to Albany Port, based on weigh bridge information. The combination of methods employed by the company allow tracking and tracing of input and output volumes. The organization does not intend to use SBP Trademarks, but might do so in future.

6 Evaluation process

6.1 Timing of evaluation activities

The main evaluation occurred 27th to 29th July 2020. The auditor evaluated supply base, COC, and GHG emission points and data at Plantation Energy Australia pellet mill through observation, documentation and record review, and interviews with staff. The audit team presented its findings during a closing meeting with the BP's representative on the final day. The audit team consisted of Ciara McCarthy as lead auditor and Graeme Lea as trainee audit. The audit team met with Matthew Joubert and other personnel including the plant manager, quality and safety coordinator, control Room Operator, site Supervisor and Quality Assurance Technician.

A 4 week stakeholder consultation period was conducted by SCS Global Services prior to the audit.

Site Name or Location:	Plantation Energy Australia	
Date and Time of Audit:	DAY 1: 9am local time 27 th July 2020	
Audit Activity	Items to Review / Actions	Approx. Time
Document review – off line for auditor	Individual review of records	5 hours
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	20 Min
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)	30 Min
Evaluation of trademarks	Review of auditor-selected sample of SBP and/or SCS on-product and/or promotional trademark uses; review of any on-site trademark uses such as banners, posters, entryway signs	60 Min
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	20 Min
Walkthrough of facility	Review of physical inputs and outputs, material receipt, processing, storage, credit account (if applicable), sale, and overall control. Verify GHG inventory.	20 min
Verification of calculations and transactions	Auditor-selected sample and verification of calculations for conversion factors, percentage claims, and credit accounts, as applicable, review of DTS transactions	30 Min
Brief summary of DAY 1		20 Min
DAY 2	28-July-2020	
Document review – Offline - Auditor	Individual review of records	5 hours
SBP ST 5, ID5A, ID5B, & ID5C	Review of GHG data collection	2 hours
Port storage facility	Review of inputs and outputs, material receipt, processing, storage, credit account, sales, GHG inventory verification, interview with port manager.	30 Min

Review of nonconformities	<ul style="list-style-type: none"> ▪ Review open nonconformities. ▪ General discussion of nonconformities. 	30 Min
Brief summary of DAY 2		20 Min
DAY 3	29-July-2020 - Document review and follow-up questions	8h
DAY 3	29-July-2020	
Closing meeting preparation	Auditor takes time to consolidate notes and review audit findings for presentation at closing meeting	30 Min
Preliminary Closing meeting and review of findings	Convene with all relevant staff to summarize audit findings, review identified nonconformities, and discuss next steps	30 Min

6.2 Description of evaluation activities

The virtual remote audit included evaluation of the documented management system, collection and communication of energy data, chain of custody system, and material procurement. Audit methods consisted of observation during virtual site walkthrough of the pellet mill, review of documentation (e.g., studies, assessments, surveys, websites, emails, databases, etc.), and interviews. Critical control points for material procurement and handling, and GHG emissions were evaluated. The on-site verification shall be conducted prior to the end of 2020 in accordance with the SBP derogation, and subject to COVID-19 restrictions.

6.3 Process for consultation with stakeholders

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 4 week stakeholder consultation prior to the audit date. Two separate comments were received or came to the attention of SCS and the auditor.

7 Results

7.1 Main strengths and weaknesses

The strength of BP's program is the integration of SBP requirements into its existing fibre sourcing management system and procedures designed to meet requirements of applicable laws and regulations in the supply base and the requirements of PEFC CoC Standard

The BP has the organizational capacity to systematically meet performance objectives and SBP requirements based on the elements of the SBP Standards that were tested. Weaknesses were identified as nonconformities and reported in section 10.

7.2 Rigour of Supply Base Evaluation

Not applicable.

7.3 Collection and Communication of Data

The BP collects and reports all GHG emissions data deemed necessary by its customers and regulators. The BP uses proprietary software to collect and communicate data, and records data in SBP Audit Report on Energy and GHG data (SAR). At the audit, there were nonconformities issued to SBP Standard 5 and associated Instruction Documents (see section 10).

7.4 Competency of involved personnel

Plantation Energy Australia assigned personnel with appropriate skills and competency to implement and execute the management and control systems relating to SBP compliance. Staff interviewed during the assessment were found to be knowledgeable of the SBP requirements. Additionally, a consultant competent in forestry supply chains, forestry practices and SBP was involved with the SBP system development and integration.

7.5 Stakeholder feedback

Two comments were received by stakeholders during the 4 week period.

- *Positive comment from local entity in support of Plantation Energy Australia's work and wood utilization project.*
- *Comment enquiring about SBP scheme and if it was the same as FSC. SCS responded with several documents providing information on SBP and a link to the SBP website.*

7.6 Preconditions

No preconditions were issued.

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.

No supply base evaluation undertaken.

9 Review of Company's mitigation measures

Not applicable

10 Non-conformities and observations

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

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

NC number 01	NC Grading: Minor
Standard & Requirement:	Section ST 5, 5.1
Description of Non-conformance and Related Evidence:	
Moisture content averages were not calculated correctly from data spreadsheets.	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	Biomass producer corrected SAR figures for moisture content.
Findings for Evaluation of Evidence:	SAR and data background were correct.
NC Status:	Closed
NC number 02	NC Grading: Minor
Standard & Requirement:	ID 5E, 6.5.3
Description of Non-conformance and Related Evidence:	
Background data for diesel usage was not complete on energy log.	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date

Evidence Provided by Company to close NC:	Updated energy log with all months was submitted in order for verification of the data to be completed.
Findings for Evaluation of Evidence:	The energy log data provided the background data verification that was required. All data was correctly reported in the SAR.
NC Status:	Closed

11 Certification decision

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

Certification decision:	Certification approved
Certification decision by (name of the person):	Theodore Brauer
Date of decision:	10/Sep/2020
Other comments:	<i>Click or tap here to enter text.</i>