



Supply Base Report: Varn Wood Products, LLC

Re-assessment

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Completed in accordance with the Supply Base Report Template Version 1.3

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

Document history

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Contents

| | | |
|-----------|---|-----------|
| 1 | Overview | 1 |
| 2 | Description of the Supply Base | 2 |
| 2.1 | General description..... | 2 |
| 2.2 | Actions taken to promote certification amongst feedstock supplier..... | 3 |
| 2.3 | Final harvest sampling programme..... | 3 |
| 2.4 | Flow diagram of feedstock inputs showing feedstock type [optional]..... | 4 |
| 2.5 | Quantification of the Supply Base..... | 4 |
| 3 | Requirement for a Supply Base Evaluation | 6 |
| 4 | Supply Base Evaluation | 7 |
| 4.1 | Scope..... | 7 |
| 4.2 | Justification..... | 7 |
| 4.3 | Results of Risk Assessment..... | 7 |
| 4.4 | Results of Supplier Verification Programme..... | 7 |
| 4.5 | Conclusion..... | 7 |
| 5 | Supply Base Evaluation Process | 9 |
| 6 | Stakeholder Consultation | 10 |
| 6.1 | Response to stakeholder comments..... | 10 |
| 7 | Overview of Initial Assessment of Risk | 13 |
| 8 | Supplier Verification Programme | 14 |
| 8.1 | Description of the Supplier Verification Programme..... | 14 |
| 8.2 | Site visits..... | 14 |
| 8.3 | Conclusions from the Supplier Verification Programme..... | 14 |
| 9 | Mitigation Measures | 15 |
| 9.1 | Mitigation measures..... | 15 |
| 9.2 | Monitoring and outcomes..... | 18 |
| 10 | Detailed Findings for Indicators | 22 |
| 11 | Review of Report | 23 |
| 11.1 | Peer review..... | 23 |
| 11.2 | Public or additional reviews..... | 23 |
| 12 | Approval of Report | 24 |
| 13 | Updates | 25 |
| 13.1 | Significant changes in the Supply Base..... | 25 |
| 13.2 | Effectiveness of previous mitigation measures..... | 25 |
| 13.3 | New risk ratings and mitigation measures..... | 25 |

13.4 Actual figures for feedstock over the previous 12 months 25

13.5 Projected figures for feedstock over the next 12 months..... 25

Annex 1: Detailed Findings for Supply Base Evaluation Indicators 27

1 Overview

Producer name: Varn Wood Products, LLC
 Producer location: 11873 Brantley Ave N, Hoboken, GA 31542
 Geographic position: 31.183066 / -82.135758
 Primary contact: William F. Varn, Jr.
 P O Box 128, Hoboken, GA 31542
 +1 912 458 2185
wfvarn1@gmail.com
 Company website: <http://www.varnwood.com/>
 Date report finalised: 11/Aug/2020
 Close of last CB audit: 12/Aug/2020
 Name of CB: SCS Global Services
 Translations from English: NA
 SBP Standard(s) used: Standard 1 version 1.0, Standard 2 version 1.0
 Weblink to Standard(s) used: <https://sbp-cert.org/documents/standards-documents/standards>
 SBP Endorsed Regional Risk Assessment: Not applicable
 Weblink to SBE on Company website: <http://varnwood.com/vwsupply.pdf>

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

2 Description of the Supply Base

2.1 General description

The Biomass Producer (BP) purchases secondary and tertiary feedstock in the form of pine wood fiber from its sister pine sawmill located adjacent to the wood pellet mill. The sawmill receives pine logs from twenty nine (29) suppliers and/or loggers. The BP, on occasion, purchases secondary pine chips and shavings from three (3) secondary and tertiary suppliers. The supply base includes hundred thirty-five (135) counties (18,557,462 hectares) in Alabama (3 counties), Georgia (84 counties) and Florida (48 counties) within the United States.

Forests are the predominant land use in this supply base (66%). Pine forests comprise the largest forest type (49%) of the supply area's forest followed by hardwood forests (38%). The mixed pine/oak forest comprises 10% of the supply area's forest type while about 3% of the forest is considered non-stocked. About 64% of the supply area's forests are managed as natural forests (7,686,610 hectares) while the remaining 38% of the supply area's forests are artificially regenerated (4,326,487 hectares).

These forests are primarily owned by private individuals, companies or investments groups (81%). Federal and state lands account for about 9% of the forestland each. Local municipalities own a little over 1% of the forestland. The BP purchases its fiber primarily from its sister pine sawmill. Small landowners provide 31% of the fiber furnish to the pine sawmill while large private landowners provide the remaining 69%.

The forest products industry is a very large part of the area's economy and is one of the top industries within the three states generating \$21.3 billion in GA, \$25.05 billion in FL and \$18.4 billion in AL.

| State | Number of Wood Using Facilities in State | | | | |
|-------|--|---------|-----------|-----------|-------|
| | Pulp/Paper | Sawmill | Bioenergy | Chip Mill | Other |
| AL | 13 | 77 | 6 | 8 | 67 |
| FL | 6 | 37 | 3 | 3 | 25 |
| GA | 12 | 93 | 13 | 28 | 61 |

The most recent USDA Forest Service Forest Inventory & Analysis (FIA) Timber Products Output (TPO) reported that in 2015 there was a total of 53.38 million greens tons of roundwood harvest within the VWP supply base. The BP uses 0.03% of the overall wood fiber harvested annually in its overall supply area.

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*). No tree species purchased by the BP is listed on the CITES list. Longleaf pine has been added to the IUCN Red List. There are two Alliance for Zero Extinction (AZE) sites identified with the BP's defined supply area that contain aquatic animals that are on the IUCN Red List. These two sites are:

1. Auchilla Wildlife Management Area – This AZE site is triggered by Big Blue Spring crayfish (*Procambarus horsti*). This species is on the IUCN Red List and is classified as endangered. The entire known population is confined to this site. The Aucilla Wildlife Management Area covers 50,471 acres in the area between and around the Aucilla and Wacissa rivers. The Aucilla River originates from artesian springs in southern Georgia and becomes a blackwater stream as it twists its way through Florida to the Gulf of Mexico. Aucilla WMA is a mature hardwood forest and is one of the earliest sites of human habitation in North America.

2. Ocala National Forest – This AZE site triggered by the Silver Glen Springs crayfish (*Procambarus attiguus*) and the big-cheeked cave crayfish (*Procambarus delicatus*). Entire known population of both species confined to this site. The Ocala National Forest is the second largest nationally protected forest in the state of Florida. It covers 607 square miles (1,570 km²) of Central Florida. The Ocala National Forest, established in 1908, is the oldest national forest east of the Mississippi River and the southernmost national forest in the continental U.S.

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 BP's supply area are managed according to state forestry best management practices (BMPs). All BP suppliers are contractually required to abide by state BMPs. Supplier compliance with state BMPs is verified by periodic audits conducted by the BP. The BP'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 GA was 94.4% (2019), FL was 99.6% (2017) and AL was 98.3% (2019).

Sustainable forestry certification is present in the BP's supply with the pine sawmill purchasing 63% of its fiber as certified (SFI –46% and ATF – 17%).

2.2 Actions taken to promote certification amongst feedstock supplier

The BP is certified to the Sustainable Biomass Partnership (SBP) Standard (SBP-04-20), SFI Fiber Sourcing Standard (NSF-SFI-FS-C0265158) and the PEFC Chain of Custody Standard (NSF-PEFC-COC-C0265158). Two of the three secondary suppliers are certified to the SFI Fiber Sourcing standard. As part of BP's SFI compliance program, the company promotes SFI and American Tree Farm certification through the distribution of GA SIC landowner packets. These packets provide educational information on forest certification programs such as the American Tree Farm system. The BP provides this information to landowners when timber is purchased. In addition the BP 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

Not applicable. No primary feedstock is received at the BP's facility. Secondary feedstock is only used.

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

2.5 Quantification of the Supply Base

Supply Base

- Total Supply Base area (ha): 18,557,462 ha of which 12,165,914 ha are forested (66%)
- Tenure by type (ha): privately owned (9,883,983) / public (2,281,931)
- Forest by type (ha): temperate (12,165,914)
- Forest by management type (ha): plantation (4,356,337)/managed natural (7,469,687)/natural (399,890)
- Certified forest by scheme (ha): (e.g. hectares of FSC or PEFC-certified forest)

| | SFI | ATFS | FSC |
|-------|-----------|---------|---------|
| AL | 1,198,807 | 44,297 | 313,461 |
| FL | 718,397 | 36,581 | 51,539 |
| GA | 913,800 | 23,732 | 37,438 |
| Total | 2,831,004 | 104,610 | 402,438 |

Feedstock

- Total volume of Feedstock: tonnes or m³ - 0 - 200,00 tonnes *
- Volume of primary feedstock: tonnes or m³ - 0 tonnes
- List percentage of primary feedstock (g), by the following categories. - percentages may be shown in a banding between XX% to YY% if a compelling justification is provided*. Subdivide by SBP-approved Forest Management Schemes: (Not Applicable)
 - Certified to an SBP-approved Forest Management Scheme
 - Not certified to an SBP-approved Forest Management Scheme
- List all species in primary feedstock, including scientific name
- Volume of primary feedstock from primary forest 0 tonnes
- List percentage of primary feedstock from primary forest (j), by the following categories. Subdivide by SBP-approved Forest Management Schemes: (Not Applicable)
 - Primary feedstock from primary forest certified to an SBP-approved Forest Management Scheme
 - Primary feedstock from primary forest not certified to an SBP-approved Forest Management Scheme
- Volume of secondary feedstock: specify origin and type - the volume may be shown as a % of the figure in (f) and percentages may be shown in a banding between XX% to YY% if a compelling justification is provided*.

| | |
|--------------|------------|
| Pine Chips | 80% - 100% |
| Pine Sawdust | 0% - 19% |
- Volume of tertiary feedstock: specify origin and composition - the volume may be shown as a % of the figure in (f) and percentages may be shown in a banding between XX% to YY% if a compelling justification is provided*. Pine Shavings 0% - 19%

* Compelling justification would be specific evidence that, for example, disclosure of the exact figure would reveal commercially sensitive information that could be used by competitors to gain

competitive advantage. State the reasons why the information is commercially sensitive, for example, what competitors would be able to do or determine with knowledge of the information.

Bands for (f) and (g) are:

1. 0 – 200,000 tonnes or m³
2. 200,000 – 400,000 tonnes or m³
3. 400,000 – 600,000 tonnes or m³
4. 600,000 – 800,000 tonnes or m³
5. 800,000 – 1,000,000 tonnes or m³
6. >1,000, 000 tonnes or m³

Bands for (h), (l) and (m) are:

1. 0%-19%
2. 20%-39%
3. 40%-59%
4. 60%-79%
5. 80%-100%

NB: Percentage values to be calculated as rounded-up integers.

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 Varn Wood Products, LLC is to confirm adherence to all indicators of Principles 1 & 2 of SBP Framework Standard 1: Feedstock Compliance Standard. The BP has implemented policies and procedures appropriate to the size and scale of its operations and no indicators were excluded. The supply base evaluation includes all secondary and tertiary feedstocks that are sourced from the 135 counties identified in Alabama, Florida and Georgia.

4.2 Justification

The evaluation assessed each of the indicators within Principles 1 & 2 of SBP Framework Standard 1: Feedstock Compliance to determine adherence 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 with the exception of indicators 2.1.2, 2.1.3, 2.2.1, 2.2.2, 2.2.3, 2.2.4, 2.2.5, 2.2.6 and 2.4.1. 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 are no indicators determined to be "unspecified risk".

4.5 Conclusion

Based on the results of the supply base evaluation there is low risk to all indicators SBP Framework Standard 1: Feedstock Compliance except for indicators 2.1.2, 2.1.3, 2.2.1, 2.2.2, 2.2.3, 2.2.4, 2.2.5, 2.2.6 and 2.4.1, which are determined to be "specified risk" and will require mitigation measures to lower this identified risk.

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 Forest Inventory & Analysis (FIA) 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, Biological Integrity LLC, a consulting company specializing in conservation and biodiversity assessments.

The BP has procurement personnel on staff to monitor the overall fiber procurement operation for the BP's sister pine sawmill, the source of the majority of the wood pellet mill's feedstock. Procurement personnel are certified as a Georgia Registered Forester and are Georgia Master Logger trained. Gary Boyd, Greener Options, Inc. is a SAF Certified Forester, a Georgia Registered Forester and an ISO 14001 Environmental Management Lead Auditor. Mark Hughes Ph.D., Biological Integrity LLC, is an accomplished wildlife biologist who has published more than 10 scientific articles, books and monographs. He has developed more than forty (40) risk assessments for forest products companies addressing sustainable forestry certification schemes such as the Forest Stewardship Council (FSC) and the Programme for the Endorsement of Forest Certification (PEFC).

The supply base was determined based on 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, GreenPeace, World Resources Institute (WRI), Conservation International (CI), NatureServe and the various state natural heritage programs from within the supply base was also reviewed to determine potential high conversation 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.

The BP's sawmill 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 BP's procurement personnel use various field verification systems for the sawmill's primary suppliers and its other secondary feedstocks. Sawmill suppliers are verified at the forest level through on-site harvest and BMP inspections conducted by BP personnel. Fourteen (14) BMP inspections & five (5) re-inspections were completed in 2019-2020. Secondary and tertiary feedstock suppliers have been visited at least annually to confirm their supply base and the species they purchase for their operations.

6 Stakeholder Consultation

A list of twenty six (26) local and regional stakeholders was identified for initial 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. While no recognized indigenous peoples groups have been identified within the supply area, the company sent stakeholder letters in 2018 to three federally recognized tribes (Poarch Band of Creeks, the Seminole Tribe of Florida and the Miccosukee Tribe of Indians) in AL, FL and GA plus one logging contractors association (Southeastern Wood Producers Association). No feedback has been received from these tribes or association.

A letter was sent to the identified stakeholders notifying them the intent of Varn Wood Products, LLC to become SBP certified and asking for input on their thoughts on Varn'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 was reviewed and responses provided upon request. A summary of the feedback is described below in Section 6.1.

A second stakeholder consultation was conducted at the time of the second surveillance audit. Upon identifying two new secondary feedstock suppliers, the BP revised its risk assessment as part of its supply base due diligence program. The results of this revised risk assessment were letters sent to 25 stakeholders within the revised supply base to seek comments on the BP's impact to the local region. The second consultation will consisted of a letter sent to these interested parties. Feedback was received from one stakeholder and is described below in Section 6.1.

A third stakeholder consultation is scheduled to be distributed by June 4, 2020 as part of the BP's renewal certification audit.

6.1 Response to stakeholder comments

As of May 25, 2020 four stakeholders have responded to notification letter sent out on September 16, 2015 and two stakeholders have responded to the communication sent out on June 17, 2020. No further responses have been received.

Stakeholder's comments are supportive of the BP's presence in the region and endorse certification. These comments are summarized below.

2015

Comment 1: Mr. Strant Colwell, U S Fish & Wildlife Service

The Coastal Georgia of the U S Fish & Wildlife Service supports sustainable forestry. Having reviewed the "Forestry Biomass Assessment for Georgia – General Statewide Estimates" published by the Georgia Forestry Commission, it appears Georgia's timberlands are growing over 9 million tons (oven dry basis) more wood each year than is being removed. Based on these data sources and analyses this indicates the expansion of the bioenergy industry can be accomplished without threatening sustainability of the forest resource.

VWP may have a positive impact on sustainable forestry in the area by supporting management techniques that are “friendly” to the environment such as Forestry Best management Practices and protecting the gopher tortoise (*Gopherus Polyphemus*). The gopher tortoise is a candidate species for federal listing under the ESA in your area of operation. Encouraging and educating the forestry community to protect it may help prevent the need to list it. One simple technique to protect the gopher tortoise is to avoid damaging tortoise burrow entrances with heavy equipment or by felling and dragging trees. Marking a ten foot radius low-impact buffer at the burrows will minimize the chance of burrow collapse.

Response 1: We appreciate your support of our presence in the area and sustainable forestry. Having been certified to the Sustainable Forestry Initiative for the last few years we make voluntary Forestry Best Management Practices mandatory in our operations. We will take your information you have provided on the protection of the gopher tortoise and help educate our suppliers on these techniques.

Comment 2: Dr. Dale Greene, Dean of the Warnell School of Forestry and Natural Resources, the University of Georgia

VWP has been a sustainable forestry leader for years. We have appreciated your participation in the State Implementation Committee of the Sustainable Forestry Initiative here in Georgia for a number of years and your leadership in the Georgia Forestry Association on numerous issues. You’ve also hosted our students and faculty for tours through your landholdings and manufacturing facilities over the years.

It is also without question that you made forestry more sustainable in your area by providing another market for harvested wood. History clearly shows that more markets for wood in an area and the competition it fosters increases the incentives for forest landowners to keep their lands in productive forests rather than converting them into other land uses. I applaud you for your pursuit of additional third-party certifications that will document the good things that you continue to do for our environment with sustainable forestry each day.

Response 2: We appreciate your letter of support. We value our relationship with the Warnell School of Forestry and Natural Resources.

Comment 3: Carl Rowland, County Manager, Brantley County, GA.

Brantley County is supportive of any efforts made by Varn Wood Products, LLC to enhance the sustainability of our local forestry. You are to be commended for participating in the deployment of Sustainable Biomass Partnership Standards.

Response 3: We appreciate your letter of support.

Comment 4: Mike Branch, Director of Operations & Regulatory Affairs, Florida Forestry Association

I have not seen any of your pine tree production here in Leon County, Florida, or over this direction lately, but I know from the past that you and your company have set the pace for other companies in the proper way to harvest trees for biomass energy pellets. I am convinced that you do not illegally harvest trees, violate the civil rights, harvest trees in forests with high conservation values, forests being converted to plantations or non-forest use, or harvest wood from forests in which genetically modified trees are planted.

Response 4: We appreciate your letter of support.

2020

Comment 1: Risher A. Willard, Chief, Forest Services, Utilization & Marketing, Georgia Forestry Commission

With my personal knowledge of Georgia's forest industry, throughout the supply chain, gleaned over a 28+ year career with GFC and after reviewing your *Supply Base Report: Varn Wood Products, LLC*, I concur with the supply base evaluation and findings that determined Varn Wood Products to be "low risk" to the majority of the indicators; and where indicators were determined to be "specified risk", I concur that Varn Wood Products has developed and implemented measures to mitigate these indicators to "low risk".

Response 1: We appreciate your letter of support.

Comment 2: Jim McGurn, Chair, Georgia Tree Farm Program

Varn Wood Products has always supported businesses that use wood while creating markets for timber grown under the American Tree Farm System. They are members of the GA Sustainable Forestry Initiative (SFI) State Implementation Committee (SIC) and support the GA Tree Farm Program.

In summary, the GA Tree Farm Program supports the re-certification to the SBP.

Response 2: We appreciate your letter of support.

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 or specified risk and no unspecified risk was identified. No Supplier Verification Programme is required.

8.2 Site visits

Not Applicable.

8.3 Conclusions from the Supplier Verification Programme

Not Applicable.

9 Mitigation Measures

9.1 Mitigation measures

Indicators 2.1.2, 2.2.3, 2.2.4, 2.4.1

Central Florida CBA

1. The BP has contracted with Greener Options, Inc. to assist in the development and implementation of BP's certification programs. Greener Options, Inc. working with Biological Integrity, LLC attended the three FSC US Controlled Wood Regional meeting held in 2018. Mark Hughes, PhD, owner of Biological Integrity, LLC attended the Southeast Region meeting on July 31, 2018 in Atlanta, GA. Hughes actively participated in the discussion of mitigating measures for the HCVs during this meeting.
Gary Boyd, owner of Greener Options, Inc. has reviewed the FSC US Controlled Wood Regional Meeting final report findings with the BP specifically on recommended mitigation measures for the Central FL CBA.
2. The BP will work with suppliers who source wood fiber from this area to educate their suppliers, their loggers and landowners on the social benefits and values of pine flatwoods, threats from incompatible forest management activities, and opportunities for conservation through management that enhances biodiversity and reduces or eliminates these threats. This education and outreach measure will be documented using Secondary Supplier Audit Checklists.

Florida Panhandle CBA

1. The BP has contracted with Greener Options, Inc. to assist in the development and implementation of BP's certification programs. Greener Options, Inc. working with Biological Integrity, LLC attended the three FSC US Controlled Wood Regional meeting held in 2018. Mark Hughes, PhD, owner of Biological Integrity, LLC attended the Southeast Region meeting on July 31, 2018 in Atlanta, GA. Hughes actively participated in the discussion of mitigating measures for the HCVs during this meeting.
Gary Boyd, Greener Options, Inc., has reviewed the FSC US Controlled Wood Regional Meeting final report findings with the BP specifically on recommended mitigation measures for the FL Panhandle CBA.
2. The BP 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 and Native Longleaf Pine Systems, 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 Secondary Supplier Audit Checklists.

Late Successional Bottomland Hardwoods (LSBH)

1. The BP only purchases southern pine (*Pinus taeda*, *Pinus elliottii*, *Pinus palustris*, *Pinus serotina*, *Pinus echinata*) for its sawmill and wood pellet facility. These species are not commercially found in this HCV.
2. The BP has contracted with Greener Options, Inc. to assist in the development and implementation of BP's certification programs. Greener Options, Inc. working with Biological Integrity, LLC attended the three FSC US Controlled Wood Regional meeting held in 2018. Mark Hughes, PhD, owner of Biological Integrity, LLC attended the Southeast Region meeting on July 31, 2018 in Atlanta, GA. Hughes actively participated in the discussion of mitigating measures for the HCVs during this meeting.
Gary Boyd, Greener Options, Inc. has reviewed the FSC US Controlled Wood Regional Meeting final report findings with the BP specifically on recommended mitigation measures for LSBH.

3. The BP 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 Secondary Supplier Audit Checklists.

Native Longleaf Pine Systems (NLPS)

1. The BP has contracted with Greener Options, Inc. to assist in the development and implementation of BP's certification programs. Greener Options, Inc. working with Biological Integrity, LLC attended the three FSC US Controlled Wood Regional meeting held in 2018. Mark Hughes, PhD, owner of Biological Integrity, LLC attended the Southeast Region meeting on July 31, 2018 in Atlanta, GA. Hughes actively participated in the discussion of mitigating measures for the HCVs during this meeting.

Gary Boyd, Greener Options, Inc. has reviewed the FSC US Controlled Wood Regional Meeting final report findings with the BP specifically on recommended mitigation measures for the NLPS.
2. The BP 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 fire to NLPS. This education and outreach measure will be documented using Secondary Supplier Audit Checklists.
3. The BP actively partners with the Longleaf Alliance through its membership in the Georgia Forestry Association and the Georgia SFI State Implementation Committee. Financial and in-kind support is documented for the education and awareness of private forest landowners implementing sustainable forestry practices.

Alliance for Zero Extinction (AZE)

1. Auchilla Wildlife Management Area
 - a) The BP only purchases southern pine (*Pinus taeda*, *Pinus elliotii*, *Pinus palustris*, *Pinus serotina*, *Pinus echinata*) for its sawmill and wood pellet facility. These species are not commercially found in this HCV as stated above.
 - b) There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.
2. Ocala National Forest
 - a) There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.
 - b) If wood is harvested from the National Forest, the USDA Forest Service conducts environment impact studies, stakeholder consultations and oversees all timber harvesting on these forests within the HCV providing complete protection of the HCV.
3. Torreya State Park
 - a) The BP only purchases southern pine (*Pinus taeda*, *Pinus elliotii*, *Pinus palustris*, *Pinus serotina*, *Pinus echinata*) for its sawmill and wood pellet facility. These species are not commercially found in this HCV as stated above.
 - b) There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.

IUCN Centre for Plant Diversity (CPD)

1. NA25 - Eastern serpentine flora

- a) The BP only purchases southern pine (*Pinus taeda*, *Pinus elliottii*, *Pinus palustris*, *Pinus serotina*, *Pinus echinata*) for its sawmill and wood pellet facility. These species are not commercially found in this HCV as stated above.
 - b) There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.
2. NA29 - The Central Highlands of Florida
- a) The BP only purchases southern pine (*Pinus taeda*, *Pinus elliottii*, *Pinus palustris*, *Pinus serotina*, *Pinus echinata*) for its sawmill and wood pellet facility. Sand pine (*Pinus clausa*), which is the predominant overstory species for the is HCV, is not purchased or used.
 - b) There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.

Critical Ecosystem Partnership Fund

1. This vast designation includes all the other HCVs described within this risk assessment at a more site specific scale.
2. There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.

GreenPeace Intact Forest

1. There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.
2. No wood is harvested out of the described National Wilderness Area which is managed by the Department of Interior. If wood is harvested from the surrounding forests described above, The Department of Interior and the Georgia Forestry Commission conducts environment impact studies and oversees all timber harvesting on these forests within the HCV providing complete protection of the HCV.

WWF Global 200 Ecoregion - Southeastern Coniferous & Broadleaf Forests

1. The Southeastern mixed forests (NA0413)
 - a) WWF has declared more than 99% of this ecoregion having been converted. The remaining examples of this HCV are known to occur on protected lands.
2. The Southeastern conifer forests (NA0529)
 - a) As stated above, WWF has declared most of this HCV has been reduced to less than 1% of its original size. The remaining examples of this HCV are known to occur on protected lands.
 - b) While the BP does use some longleaf pine (*Pinus palustris*), the company tracks the use of this species through the monitoring of its direct purchases of wood from the forest and through its secondary suppliers that are audited on an annual basis. Most longleaf pine purchased can be documented not coming from HCV areas as described by FSC HCV framework organizations.

The BP actively partners with the Longleaf Alliance through its membership in the Georgia Forestry Association and the Georgia SFI State Implementation Committee. Financial and in-kind support is documented for the education and awareness of private forest landowners implementing sustainable forestry practices.

Indicator 2.1.3

1. BP Supplier Agreements prohibit suppliers 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.
2. BP monitors compliance through BMP audits and records compliance on the BMP compliance checklist as well as Secondary Supplier Audits.

Indicator 2.2.1, 2.2.2

1. BP maintains SFI Fiber Sourcing certification.
2. BP's Supplier Agreements and Logging Contracts contain requirements for suppliers to comply with state BMP guidelines.
3. BP conducts BMP compliance audits on harvest tracts to provide feedstock to the BP's sawmill.
4. BP annually accesses state SIC logger training databases to verify logger training status and conducts BMP compliance checks to verify supplier compliance with BMPs for primary feedstock.
5. BP annually audits secondary suppliers to evaluate their BMP compliance and use of qualified logging professionals.
6. BP reviews state BMP compliance reports.

Indicator 2.2.5

1. BP maintains SFI Fiber Sourcing certification.
2. BP's Supplier Agreements and Logging Contracts contain requirements for suppliers to comply with state BMP guidelines.
3. BP conducts BMP compliance audits on harvest tracts to provide feedstock to the BP's sawmill. Wood utilization is an item that is audited as part of the audit process.
4. BP annually accesses state SIC logger training databases to verify logger training status and conducts BMP compliance checks to verify supplier compliance with BMPs for primary feedstock.
5. BP annually audits secondary suppliers to evaluate their BMP compliance, use of qualified logging professionals and distribution of the "Forest Biomass Retention and Harvesting Guidelines for the Southeast".
6. BP reviews state BMP compliance reports.

Indicator 2.2.6

1. BP maintains SFI Fiber Sourcing certification.
2. BP's Supplier Agreements and Logging Contracts contain requirements for suppliers to comply with state BMP guidelines.
3. BP conducts BMP compliance audits on harvest tracts to provide feedstock to the BP's sawmill. Wood utilization is an item that is audited as part of the audit process.
4. BP annually accesses state SIC logger training databases to verify logger training status and conducts BMP compliance checks to verify supplier compliance with BMPs for primary feedstock.
5. BP reviews state BMP compliance reports.

9.2 Monitoring and outcomes

Implementation of mitigation has started. Below are descriptions of how monitoring is occurring and initial outcomes by indicators.

Indicators 2.1.2, 2.2.3, 2.2.4, 2.4.1

Central Florida CBA

1. Consultant has reviewed the FSC US Controlled Wood Regional Meeting final report findings with the BP specifically on recommended mitigation measures for the Central FL CBA.
2. Monitoring occurs during annual supplier audits and documented using Secondary Supplier Audit Checklists.

Florida Panhandle CBA

1. Consultant has reviewed the FSC US Controlled Wood Regional Meeting final report findings with the BP specifically on recommended mitigation measures for the FL Panhandle CBA.
2. Monitoring occurs during annual supplier audits and documented using Secondary Supplier Audit Checklists.

Late Successional Bottomland Hardwoods (LSBH)

1. The BP only purchases southern pine (*Pinus taeda*, *Pinus elliottii*, *Pinus palustris*, *Pinus serotina*, *Pinus echinata*) for its sawmill and wood pellet facility. These species are not commercially found in this HCV.
2. Consultant has reviewed the FSC US Controlled Wood Regional Meeting final report findings with the BP specifically on recommended mitigation measures for LSBH.
3. Monitoring occurs during annual supplier audits and documented using Secondary Supplier Audit Checklists.

Native Longleaf Pine Systems (NLPS)

1. Consultant has reviewed the FSC US Controlled Wood Regional Meeting final report findings with the BP specifically on recommended mitigation measures for the NLPS.
2. Monitoring occurs during annual supplier audits and documented using Secondary Supplier Audit Checklists.
3. The BP actively partners with the Longleaf Alliance through its membership in the Georgia Forestry Association and the Georgia SFI State Implementation Committee. Financial and in-kind support is documented for the education and awareness of private forest landowners implementing sustainable forestry practices.

Alliance for Zero Extinction (AZE)

1. Auchilla Wildlife Management Area
 - a) The BP only purchases southern pine (*Pinus taeda*, *Pinus elliottii*, *Pinus palustris*, *Pinus serotina*, *Pinus echinata*) for its sawmill and wood pellet facility. These species are not commercially found in this HCV as stated above.
 - b) There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.
2. Ocala National Forest
 - a) There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.
 - b) If wood is harvested from the National Forest, the USDA Forest Service conducts environment impact studies, stakeholder consultations and oversees all timber harvesting on these forests within the HCV providing complete protection of the HCV.
3. Torreya State Park
 - a) The BP only purchases southern pine (*Pinus taeda*, *Pinus elliottii*, *Pinus palustris*, *Pinus serotina*, *Pinus echinata*) for its sawmill and wood pellet facility. These species are not commercially found in this HCV as stated above.
 - b) There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.

IUCN Centre for Plant Diversity (CPD)

1. NA25 - Eastern serpentine flora
 - a) The BP only purchases southern pine (*Pinus taeda*, *Pinus elliottii*, *Pinus palustris*, *Pinus serotina*, *Pinus echinata*) for its sawmill and wood pellet facility. These species are not commercially found in this HCV as stated above.

- b) There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.
2. NA29 - The Central Highlands of Florida
- a) The BP only purchases southern pine (*Pinus taeda*, *Pinus elliottii*, *Pinus palustris*, *Pinus serotina*, *Pinus echinata*) for its sawmill and wood pellet facility. Sand pine (*Pinus clausa*), which is the predominant overstory species for the is HCV, is not purchased or used.
 - b) There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.

Critical Ecosystem Partnership Fund

- 1. This vast designation includes all the other HCVs described within this risk assessment at a more site specific scale.
- 2. There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.

GreenPeace Intact Forest

- 1. There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.
- 2. No wood is harvested out of the described National Wilderness Area which is managed by the Department of Interior. If wood is harvested from the surrounding forests described above, The Department of Interior and the Georgia Forestry Commission conducts environment impact studies and oversees all timber harvesting on these forests within the HCV providing complete protection of the HCV.

WWF Global 200 Ecoregion - Southeastern Coniferous & Broadleaf Forests

- 1. The Southeastern mixed forests (NA0413)
 - a) WWF has declared more than 99% of this ecoregion having been converted. The remaining examples of this HCV are known to occur on protected lands.
- 2. The Southeastern conifer forests (NA0529)
 - a) As stated above, WWF has declared most of this HCV has been reduced to less than 1% of its original size. The remaining examples of this HCV are known to occur on protected lands.
 - b) While the BP does use some longleaf pine (*Pinus palustris*), the company tracks the use of this species through the monitoring of its direct purchases of wood from the forest and through its secondary suppliers that are audited on an annual basis. Most longleaf pine purchased can be documented not coming from HCV areas as described by FSC HCV framework organizations. The BP actively partners with the Longleaf Alliance through its membership in the Georgia Forestry Association and the Georgia SFI State Implementation Committee. Financial and in-kind support is documented for the education and awareness of private forest landowners implementing sustainable forestry practices.

Indicator 2.1.3

- 1. BP Supplier Agreements prohibit suppliers 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.
- 2. BP monitors compliance through BMP audits and records compliance on the BMP compliance checklist as well as Secondary Supplier Audits.

Indicator 2.2.1, 2.2.2

1. BP maintains SFI Fiber Sourcing certification.
2. BP's Supplier Agreements and Logging Contracts contain requirements for suppliers to comply with state BMP guidelines.
3. BP conducts BMP compliance audits on harvest tracts to provide feedstock to the BP's sawmill. Fourteen (14) BMP inspections & five (5) re-inspections were completed in 2019-2020 resulting in BMP compliance of 100%.
4. BP annually accesses state SIC logger training databases to verify logger training status and conducts BMP compliance checks to verify supplier compliance with BMPs for primary feedstock. 100% of suppliers/loggers were up-to-date with their logger training requirements.
5. BP annually audits secondary suppliers to evaluate their BMP compliance and use of qualified logging professionals.
6. BP reviews state BMP compliance reports.

| State | Overall BMP Compliance % |
|---------|--------------------------|
| Alabama | 98.3% |
| Florida | 99.6% |
| Georgia | 94.4% |

Indicator 2.2.5

1. BP maintains SFI Fiber Sourcing certification.
2. BP's Supplier Agreements and Logging Contracts contain requirements for suppliers to comply with state BMP guidelines.
3. BP conducts BMP compliance audits on harvest tracts to provide feedstock to the BP's sawmill. Wood utilization is an item that is audited as part of the audit process. Fourteen (14) BMP inspections & five (5) re-inspections were completed in 2019-2020 resulting in BMP compliance of 100%.
4. BP annually accesses state SIC logger training databases to verify logger training status and conducts BMP compliance checks to verify supplier compliance with BMPs for primary feedstock. 100% of suppliers/loggers were up-to-date with their logger training requirements.
5. BP annually audits secondary suppliers to evaluate their BMP compliance, use of qualified logging professionals and distribution of the "Forest Biomass Retention and Harvesting Guidelines for the Southeast".
6. BP reviews state BMP compliance reports.

Indicator 2.2.6

1. BP maintains SFI Fiber Sourcing certification.
2. BP's Supplier Agreements and Logging Contracts contain requirements for suppliers to comply with state BMP guidelines.
3. BP conducts BMP compliance audits on harvest tracts to provide feedstock to the BP's sawmill. Fourteen (14) BMP inspections & five (5) re-inspections were completed in 2019-2020 resulting in BMP compliance of 100%.
4. BP annually accesses state SIC logger training databases to verify logger training status and conducts BMP compliance checks to verify supplier compliance with BMPs for primary feedstock. 100% of suppliers/loggers were up-to-date with their logger training requirements.
5. BP reviews state BMP compliance reports.

10 Detailed Findings for Indicators

Detailed findings for each Indicator are given in Annex 1.

11 Review of Report

11.1 Peer review

No peer review has been completed for this report.

11.2 Public or additional reviews

No additional external review of this report has been completed by other stakeholders.

12 Approval of Report

| Approval of Supply Base Report by senior management | | | |
|---|----------------------------|------------------------------------|-----------------------|
| Report Prepared by: | <i>Gary Boyd</i> | <i>Consultant</i> | <i>25 May 2020</i> |
| | Name | Title | Date |
| <p>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.</p> | | | |
| Report approved by: | <i>William F. Varn, Jr</i> | <i>Manager – Timber Operations</i> | <i>11 August 2020</i> |
| | Name | Title | Date |
| Report approved by: | <i>[name]</i> | <i>[title]</i> | <i>[date]</i> |
| | Name | Title | Date |
| Report approved by: | <i>[name]</i> | <i>[title]</i> | <i>[date]</i> |
| | Name | Title | Date |

13 Updates

Note: Updates should be provided in the form of additional pages, either published separately or added to the original public summary report.

13.1 Significant changes in the Supply Base

None

13.2 Effectiveness of previous mitigation measures

Mitigation measures have only recently been implemented. Their effectiveness has not been evaluated.

13.3 New risk ratings and mitigation measures

Indicators 2.1.2, 2.1.3, 2.2.1, 2.2.2, 2.2.3, 2.2.4, 2.2.5, 2.2.6 and 2.4.1 of SBP Framework Standard 1: Feedstock Compliance have been evaluated to be specified risk.

13.4 Actual figures for feedstock over the previous 12 months

See Section 2.5

13.5 Projected figures for feedstock over the next 12 months

- f. Total volume of Feedstock: tonnes or m³ - 0 - 200,00 tonnes *
- g. Volume of primary feedstock: tonnes or m³ - 0 tonnes
- h. List percentage of primary feedstock (g), by the following categories. - percentages may be shown in a banding between XX% to YY% if a compelling justification is provided*. Subdivide by SBP-approved Forest Management Schemes: (Not Applicable)
 - a. Certified to an SBP-approved Forest Management Scheme
 - b. Not certified to an SBP-approved Forest Management Scheme
- i. List all species in primary feedstock, including scientific name
- j. Volume of primary feedstock from primary forest 0 tonnes
- k. List percentage of primary feedstock from primary forest (j), by the following categories. Subdivide by SBP-approved Forest Management Schemes: (Not Applicable)
 - a. Primary feedstock from primary forest certified to an SBP-approved Forest Management Scheme
 - b. Primary feedstock from primary forest not certified to an SBP-approved Forest Management Scheme
- l. Volume of secondary feedstock: specify origin and type - the volume may be shown as a % of the figure in (f) and percentages may be shown in a banding between XX% to YY% if a compelling justification is provided*.

Pine Chips 80% - 100%

Pine Sawdust 0% - 19%

- m. Volume of tertiary feedstock: specify origin and composition - the volume may be shown as a % of the figure in (f) and percentages may be shown in a banding between XX% to YY% if a compelling justification is provided*. Pine Shavings 0% - 19%

* Compelling justification would be specific evidence that, for example, disclosure of the exact figure would reveal commercially sensitive information that could be used by competitors to gain competitive advantage. State the reasons why the information is commercially sensitive, for example, what competitors would be able to do or determine with knowledge of the information.

Bands are:

1. 0 – 200,000 tonnes or m³
2. 200,000 – 400,000 tonnes or m³
3. 400,000 – 600,000 tonnes or m³
4. 600,000 – 800,000 tonnes or m³
5. 800,000 – 1,000,000 tonnes or m³
6. >1,000, 000 tonnes or m³

Annex 1: Detailed Findings for Supply Base Evaluation Indicators

| | Indicator |
|-------------------------------|---|
| 1.1.1 | The Biomass Producer's Supply Base is defined and mapped. |
| Finding | The Biomass Producer's (BP) Supply Base is defined and mapped as part of the company's SBP Supply Base Risk Assessment. The map and list of states & counties are defined by the present and projected future needs of the plant and includes identified secondary feedstock suppliers. |
| Means of Verification | <ul style="list-style-type: none"> Map of supply basin and list of states & counties. |
| Evidence Reviewed | <ul style="list-style-type: none"> VWP-DOC-008a SBP Supply Base Risk Assessment |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

| | Indicator |
|-----------------------|--|
| 1.1.2 | Feedstock can be traced back to the defined Supply Base. |
| Finding | <p>Secondary feedstock comes primarily from the BP's sister pine sawmill located adjacent to the wood pellet mill. Sawmill feedstock can be traced back to the defined Supply Base through scale ticket documentation and wood inventory records where each scale ticket defines the county and state that feedstock originates.</p> <p>In addition to the transferred pine chips and shavings, on occasion, other secondary feedstock is received from near-by sawmills. Communications with secondary feedstock suppliers confirms feedstock originates from within the BP's supply base and is recorded using the secondary supplier audit checklist.</p> |
| Means of Verification | <ul style="list-style-type: none"> Scale tickets Records in wood inventory system Supplier agreements and Logging contracts Communications with suppliers |
| Evidence Reviewed | <ul style="list-style-type: none"> VWP-PROC-002 Chain of Custody Procedures VWP-PROC-001 SFI Fiber Sourcing Procedures VWP-DOC-004 Landowner Survey BMP Compliance VWP-DOC-008a SBP Supply Base Risk Assessment VWP-DOC-016 Secondary Supplier Audit Checklist |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |

| | |
|-------------------------------|--|
| Comment or Mitigation Measure | |
|-------------------------------|--|

| | Indicator |
|-------------------------------|---|
| 1.1.3 | The feedstock input profile is described and categorised by the mix of inputs. |
| Finding | TO BE COMPLETED |
| Means of Verification | Wood purchases in wood inventory system. |
| Evidence Reviewed | Wood purchases during period 1 July 2019 through 30 June 2020. |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

| | 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 | <p>The BP referenced FSC’s NATIONAL RISK ASSESSMENT FOR THE CONTERMINOUS UNITED STATES OF AMERICA (FSC-NRA-USA V1-0) as part of its risk assessment. The national assessment has determined Controlled Wood Category 1: Illegally harvested wood to be “low risk”.</p> <p>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. 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.</p> |
| Means of Verification | <ul style="list-style-type: none"> • State laws • Supplier Agreements and Logging Contracts • National Risk Assessment for the Conterminous United States of America (FSC-NRA-USA V1-0) • VWP-DOC-004 Landowner Survey BMP Compliance • VWP-DOC-008a SBP Supply Base Risk Assessment |
| Evidence Reviewed | <ul style="list-style-type: none"> • Supplier Agreements and Logging Contracts - have clauses concerning the legality of ownership of the feedstock to be purchased |

| | |
|-------------------------------|---|
| | <ul style="list-style-type: none"> • VWP-POL-001 Sustainable Forestry Policy - requires that all applicable laws and regulations are followed • VWP-PROC-002 Chain of Custody Procedures - requires legal ownership of feedstock received • VWP-DOC-008 PEFC Due Diligence Risk Assessment - states illegal harvesting of feedstock is LOW risk • VWP-DOC-008a SBP Supply Base Risk Assessment - states illegal harvesting of feedstock is LOW risk and includes a summary of laws & regulations addressing illegal logging and wood theft. |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

| | 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 | <p>The BP referenced FSC’s NATIONAL RISK ASSESSMENT FOR THE CONTERMINOUS UNITED STATES OF AMERICA (FSC-NRA-USA V1-0) as part of its risk assessment. The national assessment has determined Controlled Wood Category 1: Illegally harvested wood to be “low risk”.</p> <p>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. While Alabama has a state logging law, none of the counties in the VWP supply area have enacted this notification law. Florida does not have any logging permit requirements in any counties. In 2014 Georgia passed legislation, House Bill 790, that strengthens Georgia’s timber theft and timber trespass statutes.</p> <p>Evidence indicates that major violations are prosecuted and legal liability is enforced.</p> <p>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.</p> |
| Means of Verification | <ul style="list-style-type: none"> • State laws • Supplier Agreements and Logging Contracts • National Risk Assessment for the Conterminous United States of America (FSC-NRA-USA V1-0) • VWP-DOC-004 Landowner Survey BMP Compliance • VWP-DOC-008a SBP Supply Base Risk Assessment |
| Evidence Reviewed | <ul style="list-style-type: none"> • VWP-POL-001 Sustainable Forestry Policy • VWP-PROC-002 Chain of Custody Procedures • VWP-DOC-004 Landowner Survey BMP Compliance • VWP-DOC-008 PEFC Due Diligence Risk Assessment • VWP-DOC-008a SBP Supply Base Risk Assessment • Supplier Agreements and Logging Contracts • Notifications of Harvest (GA only) • State laws addressing illegal logging and wood theft are as described in VWP-DOC-008a SBP Supply Base Risk Assessment |

| | |
|-------------------------------|---|
| | <ul style="list-style-type: none"> National Risk Assessment for the Conterminous United States of America (FSC-NRA-USA V1-0) |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

| | 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 | The BP 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, but an ad valorem timber tax is paid in GA. For a lump sum sale, the ad valorem tax is calculated based on the county millage rate multiplied by the lump sum amount. This value is then deducted from the proceeds to the landowner and paid directly to the county tax commissioner. For a pay as cut contract, a report is filed quarterly to the county tax commissioner where the timber is harvested and the landowner receives a bill directly from the tax commissioner for their ad valorem timber payments. AL does have severance taxes on timber. Supplier Agreements and Logging Contracts stipulate that the landowner is responsible for paying taxes. The BP is only responsible for reporting volumes removed quarterly to the Tax Commissioner for the county of harvest. |
| Means of Verification | <ul style="list-style-type: none"> Supplier Agreements and Logging Contracts Quarterly tax reporting |
| Evidence Reviewed | <ul style="list-style-type: none"> Tax reporting to County Tax Commissioners |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

| | 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 | The BP 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 the BP operations that are included in the CITES list. |
| Means of Verification | <ul style="list-style-type: none"> List of species used by the BP and CITES list located in VWP-DOC-008 PEFC Due Diligence Risk Assessment |
| Evidence Reviewed | <ul style="list-style-type: none"> VWP-DOC-008 PEFC Due Diligence Risk Assessment |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |

| | |
|-------------------------------|--|
| Comment or Mitigation Measure | |
|-------------------------------|--|

| | 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 | <p>The BP's Sustainable Forestry Policy states it will abide by all laws and regulations, including those laws associated with traditional and civil rights.</p> <p>The BP referenced FSC's NATIONAL RISK ASSESSMENT FOR THE CONTERMINOUS UNITED STATES OF AMERICA (FSC-NRA-USA V1-0) as part of its risk assessment. The national assessment has determined Controlled Wood Category 2: Wood harvested in violation of traditional and human rights to be "low risk".</p> <p>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) While ILO Convention has not been ratified in the USA, there are laws enacted that cover the spirit of ILO Convention 169 and 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. Furthermore, there are no Federally recognized tribes of Native Americans located within the BP's supply area.</p> |
| Means of Verification | <ul style="list-style-type: none"> • Supplier Agreements and Logging Contracts - include provisions to respect laws, which includes discrimination and fair labour • VWP-DOC-008a SBP Supply Base Risk Assessment - contains a list of applicable Federal & State Laws, as well as ILO Conventions that the US has ratified • A review of the Bureau of Indian Affairs website verifies that there are no federally recognized tribes located within the company's supply area. |
| Evidence Reviewed | <ul style="list-style-type: none"> • Supplier Agreements and Logging Contracts • VWP-DOC-008a SBP Supply Base Risk Assessment • National Risk Assessment for the Conterminous United States of America (FSC-NRA-USA V1-0) • https://www.bia.gov/bia |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

| | 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. |

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| Finding | <p>The BP's SBP Supply Base Risk Assessment identified and mapped the presence or absence of the following high conservation value areas within its supply base. The National Risk Assessment for the Conterminous United States of America (US NRA) was the basis for the identification and mapping of areas with high conservation value (HCV). The US NRA consulted with and applied recommendations from over 200 conservation groups and databases including, but not limited to, Protected Areas Database of the United States (PAD-US), International Union for the Conservation of Nature (IUCN), The Nature Conservancy, NatureServe, & USFS Inventoried Roadless Areas to map these HCVs.</p> <p>In addition to the US NRA, the BP used World Wildlife Fund (WWF) eco-regions, Critical Ecosystem Partnership Fund biodiversity hotspots, IUCN Centres for Plant Diversity, Alliance for Zero Extinction and GreenPeace Intact Forests to identify and map HCV areas.</p> <p>The BP determined its supply area based on the origin of primary & secondary feedstock received. The BP has enhanced its identification and mapping of high conservation value areas (HCVs) by mapping HCV by secondary supplier. These HCV maps collectively define the overall supply area for the BP. These more detailed supplier maps utilize the conservation measures from the US NRA where HCVs of "specified risk" have been identified in addition to other HCV designations mentioned above.</p> <p>The supplier maps are used in conjunction with the BP's Secondary Supplier Audit Checklist to annually review each supplier's supply area, areas of "specified risk" that are identified in their supply areas and mitigation measures being implemented to reduce "specified risk" to "low risk". The BP's SBP Supply Base Risk Assessment identifies and maps HCVs with "specified risk" designations.</p> |
| Means of Verification | <ul style="list-style-type: none"> • VWP-DOC-008a SBP Supply Base Risk Assessment • VWP-DOC-016 Secondary Supplier Audit Checklist • Secondary Supplier Supply Area & HCV maps |
| Evidence Reviewed | <ul style="list-style-type: none"> • VWP-DOC-008a SBP Supply Base Risk Assessment • VWP-DOC-016 Secondary Supplier Audit Checklist • National Risk Assessment for the Conterminous United States of America (FSC-NRA-USA V1-0) • Secondary Supplier Supply Area & HCV maps |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

| | Indicator |
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| 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 | <p>The BP's PEFC Due Diligence and SBP Supply Base Risk Assessments assessed the potential threats to forests and other areas with high conservation values from forest management activities within the supply area. These risk assessments using FSC's National Risk Assessment for the Conterminous United States of America (FSC-NRA-USA V1-0) and other reputable conservation initiatives identified and mapped the presence or absence of the following high conservation value areas (HCVs) within the company's supply base.</p> <p>The following HCVs have been identified and mapped within the company's supply area and are assessed below. HCVs identified and assessed as "specified risk" will include describe measures to mitigate risks to a "low risk" level.</p> |

The National Risk Assessment for the Conterminous United States of America (FSC-NRA-USA V1-0) has identified the following HCVs that are located within VWP's supply area.

- HCV1: Species Diversity
 - Central Florida CBA
 - Florida Panhandle CBA
- HCV3: Rare Ecosystems
 - Late Successional Bottomland Hardwoods
 - Native Longleaf Pine Systems

Within the BP's supply area there are other HCVs associated from the high conservation value assessment frameworks identified below.

- Alliance for Zero Extinction (AZE) – There are three (3) AZE sites identified with the BP's supply area.
 3. Auchilla Wildlife Management Area – This AZE site is triggered by Big Blue Spring crayfish (*Procambarus horsti*). This species is on the IUCN Red List and is classified as endangered. The entire known population is confined to this site. The Aucilla Wildlife Management Area covers 50,471 acres in the area between and around the Aucilla and Wacissa rivers. The Aucilla River originates from artesian springs in southern Georgia and becomes a blackwater stream as it twists its way through Florida to the Gulf of Mexico. Aucilla WMA is a mature hardwood forest and is one of the earliest sites of human habitation in North America.
 4. Ocala National Forest – This AZE site triggered by the Silver Glen Springs crayfish (*Procambarus attiguus*) and the big-cheeked cave crayfish (*Procambarus delicatus*). Entire known population of both species confined to this site. The Ocala National Forest is the second largest nationally protected forest in the state of Florida. It covers 607 square miles (1,570 km²) of Central Florida. The Ocala National Forest, established in 1908, is the oldest national forest east of the Mississippi River and the southernmost national forest in the continental U.S.
 5. Torreya State Park – This state park is located within the wood basin in Liberty County, Florida. The park protects the bulk of extant occurrences within the natural range of the Florida Torreya, *Torreya taxifolia*. Two additional protected areas near the park protect additional Torreya occurrences. The Florida Torreya, the target species within this AZE site, is a tree that is 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 Florida torreya originally comprised about 4% of the forest in this area. Its wood was used primarily for fence posts. A fungal blight destroyed the population. Associate tree species included 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.
- IUCN Centre for Plant Diversity (CPD) – There are two HCV sites identified within the BP's defined supply area.
 1. NA25 - Eastern serpentine flora is restricted to soils derived from serpentine rock outcrops found in association with ultramafic rock. NA25 is restricted to the Piedmont physiographic province and is found in Columbia County, GA within the VWP supply area. Serpentine soils, associated with ultramafic bedrock, formed along a linear boundary between ancient continents. There are two of these zones in North America, one on the west coast and another on the east coast. The eastern zone extends from Alabama north into Quebec. Serpentine soils have relatively higher levels of heavy metals (cadmium and nickel) and lower levels of calcium than other soils. Therefore, are toxic to most plants. Clays in serpentine soils have a high affinity for water, more so than other clays, making less water available to plants. Plants found in this CPD are specialists. They are adapted to the harsh conditions created by these soils and cannot survive outside of this habitat, making them obligate endemics to serpentine soils. As already stated, most plants cannot live in this environment.

2. NA29 - The Central Highlands of Florida overlaps the southern-most portion of the VWP wood basin. The Lake Wales Region within NA29 is an elevated region of Florida that was dry during the most recent interglacial period of the Ice Age. This CPD contains 41 species of endemic vascular plant species found in scrub habitat with an overstory of sand pine. The ecological value of the area is its high level of plant endemism. The greatest threats to this CPD comes from conversion of native habitat for citrus production, recreation, as well as commercial and residential development.

- Critical Ecosystem Partnership Fund – North American Coastal Plain was added to the Biodiversity Hotspot list in 2016. The North American Coastal Plain reaches from a small section of northern Mexico along the Gulf of Mexico and up the East Coast to southeastern Massachusetts. Despite the 1,816 endemic plant species and the 1.13 million square kilometers of area, the hotspot has a low level of geographic variety and an unusually low level of elevation change when compared to the other hotspots, leading the scientific community to assume it would be less biodiverse. This vast designation includes all the other HCVs described within this risk assessment at a more site specific scale.
- GreenPeace Intact Forest - A Greenpeace Intact Forest is located in Charlton and Ware Counties, GA which is within the VWP defined supply area. 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. There are 353,000 acres designated as a National Wilderness Area within the refuge. Two small fingers of the Greenpeace Intact Forest extend into the Dixon Memorial Wildlife Management Area which is a state-owned forest and beyond the northern end of the refuge. The remainder of the intact forest is within the Okefenokee National Wildlife Refuge where it receives federal protection from the Department of the Interior.
- World Wildlife Fund (WWF), Global 200 Ecoregion - Southeastern Coniferous & Broadleaf Forests (# 75 in the WWF Global 200)

The WWF'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.

Almost all of the counties located in the BP's defined supply area are in the Southeastern Coniferous & Broadleaf Forests which has a conservation status of endangered/critical. It is significant at a global scale, but this *global* ecoregion (#75) is subdivided into two smaller endangered/critical terrestrial ecoregions. These scaled-down subdivisions have significance at the national level.

1. The Southeastern mixed forests (NA0413) - located in a few counties in the northern end of the VWP wood basin. This is a highly degraded ecoregion with more than 99% of the original habitat having been converted to other uses. Settlers within the ecoregion logged and then cleared the land for agriculture. The ecoregion overlaps and is synonymous with the Piedmont physiographic province along 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. There are multiple examples of protected areas within this ecoregion.
2. The Southeastern conifer forests (NA0529) - the second terrestrial ecoregion that takes up the global ecoregion # 75. The majority of the VWP wood basin overlaps this ecoregion. The ecoregion 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 a longleaf pine overstory and an exceptionally diverse array of plants in the understory and especially in the herbaceous layer. The entire ecology of this region was driven by fire which maintained a longleaf pine dominance in the overstory. Many species of birds, reptiles, and amphibians adapted to this environment as well. The red-cockaded woodpecker, gopher tortoise, indigo snake, and flatwoods

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| | <p>salamander are some of the more threatened, regulated, and managed of those taxa.</p> <p>Fire was eventually 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> |
| Means of Verification | <ul style="list-style-type: none"> • Risk assessments • Supplier Agreements and Logging Contracts • Company policy and procedures • BMP Compliance checklists • Supplier checklists |
| Evidence Reviewed | <ul style="list-style-type: none"> • WWP-DOC-008 PEFC Due Diligence Risk Assessment • WWP-DOC-008a SBP Supply Base Risk assessment • WWP-POL-002 Sustainable Forestry Policy • WWP-PROC-001 SFI Fiber Sourcing Procedures • WWP-DOC-004 Landowner Survey BMP Compliance • WWP-DOC-016 Secondary Supplier Audit Checklist • Supplier Agreements and Logging Contracts |
| Risk Rating | <input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | <p><u>Central Florida CBA</u></p> <p>3. The BP has contracted with Greener Options, Inc. to assist in the development and implementation of BP's certification programs. Greener Options, Inc. working with Biological Integrity, LLC attended the three FSC US Controlled Wood Regional meeting held in 2018. Mark Hughes, PhD, owner of Biological Integrity, LLC attended the Southeast Region meeting on July 31, 2018 in Atlanta, GA. Hughes actively participated in the discussion of mitigating measures for the HCVs during this meeting.</p> <p>Gary Boyd, owner of Greener Options, Inc. has reviewed the FSC US Controlled Wood Regional Meeting final report findings with the BP specifically on recommended mitigation measures for the Central FL CBA.</p> <p>4. The BP will work with suppliers who source wood fiber from this area to educate their suppliers, their loggers and landowners on the social benefits and values of pine flatwoods, threats from incompatible forest management activities, and opportunities for conservation through management that enhances biodiversity and reduces or eliminates these threats. This education and outreach measure will be documented using Secondary Supplier Audit Checklists.</p> <p><u>Florida Panhandle CBA</u></p> <p>3. The BP has contracted with Greener Options, Inc. to assist in the development and implementation of BP's certification programs. Greener Options, Inc. working with Biological Integrity, LLC attended the three FSC US Controlled Wood Regional meeting held in 2018. Mark Hughes, PhD, owner of Biological Integrity, LLC attended the Southeast Region meeting on July 31, 2018 in Atlanta, GA. Hughes actively participated in the discussion of mitigating measures for the HCVs during this meeting.</p> <p>Gary Boyd, Greener Options, Inc., has reviewed the FSC US Controlled Wood Regional Meeting final report findings with the BP specifically on recommended mitigation measures for the FL Panhandle CBA.</p> |

4. The BP 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 and Native Longleaf Pine Systems, 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 Secondary Supplier Audit Checklists.

Late Successional Bottomland Hardwoods (LSBH)

4. The BP only purchases southern pine (*Pinus taeda*, *Pinus elliottii*, *Pinus palustris*, *Pinus serotina*, *Pinus echinata*) for its sawmill and wood pellet facility. These species are not commercially found in this HCV.
5. The BP has contracted with Greener Options, Inc. to assist in the development and implementation of BP's certification programs. Greener Options, Inc. working with Biological Integrity, LLC attended the three FSC US Controlled Wood Regional meeting held in 2018. Mark Hughes, PhD, owner of Biological Integrity, LLC attended the Southeast Region meeting on July 31, 2018 in Atlanta, GA. Hughes actively participated in the discussion of mitigating measures for the HCVs during this meeting.

Gary Boyd, Greener Options, Inc. has reviewed the FSC US Controlled Wood Regional Meeting final report findings with the BP specifically on recommended mitigation measures for LSBH.
6. The BP 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 Secondary Supplier Audit Checklists.

Native Longleaf Pine Systems (NLPS)

4. The BP has contracted with Greener Options, Inc. to assist in the development and implementation of BP's certification programs. Greener Options, Inc. working with Biological Integrity, LLC attended the three FSC US Controlled Wood Regional meeting held in 2018. Mark Hughes, PhD, owner of Biological Integrity, LLC attended the Southeast Region meeting on July 31, 2018 in Atlanta, GA. Hughes actively participated in the discussion of mitigating measures for the HCVs during this meeting.

Gary Boyd, Greener Options, Inc. has reviewed the FSC US Controlled Wood Regional Meeting final report findings with the BP specifically on recommended mitigation measures for the NLPS.
5. The BP 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 fire to NLPS. This education and outreach measure will be documented using Secondary Supplier Audit Checklists.
6. The BP actively partners with the Longleaf Alliance through its membership in the Georgia Forestry Association and the Georgia SFI State Implementation Committee. Financial and in-kind support is documented for the education and awareness of private forest landowners implementing sustainable forestry practices.

Alliance for Zero Extinction (AZE)

4. Auchilla Wildlife Management Area
 - c) The BP only purchases southern pine (*Pinus taeda*, *Pinus elliottii*, *Pinus palustris*, *Pinus serotina*, *Pinus echinata*) for its sawmill and wood pellet facility. These species are not commercially found in this HCV as stated above.
 - d) There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.
5. Ocala National Forest

- c) There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.
 - d) If wood is harvested from the National Forest, the USDA Forest Service conducts environment impact studies, stakeholder consultations and oversees all timber harvesting on these forests within the HCV providing complete protection of the HCV.
6. Torreya State Park
- c) The BP only purchases southern pine (*Pinus taeda*, *Pinus elliottii*, *Pinus palustris*, *Pinus serotina*, *Pinus echinata*) for its sawmill and wood pellet facility. These species are not commercially found in this HCV as stated above.
 - d) There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.

IUCN Centre for Plant Diversity (CPD)

3. NA25 - Eastern serpentine flora
- c) The BP only purchases southern pine (*Pinus taeda*, *Pinus elliottii*, *Pinus palustris*, *Pinus serotina*, *Pinus echinata*) for its sawmill and wood pellet facility. These species are not commercially found in this HCV as stated above.
 - d) There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.
4. NA29 - The Central Highlands of Florida
- c) The BP only purchases southern pine (*Pinus taeda*, *Pinus elliottii*, *Pinus palustris*, *Pinus serotina*, *Pinus echinata*) for its sawmill and wood pellet facility. Sand pine (*Pinus clausa*), which is the predominant overstory species for the is HCV, is not purchased or used.
 - d) There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.

Critical Ecosystem Partnership Fund

- 3. This vast designation includes all the other HCVs described within this risk assessment at a more site specific scale.
- 4. There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.

GreenPeace Intact Forest

- 3. There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.
- 4. No wood is harvested out of the described National Wilderness Area which is managed by the Department of Interior. If wood is harvested from the surrounding forests described above, The Department of Interior and the Georgia Forestry Commission conducts environment impact studies and oversees all timber harvesting on these forests within the HCV providing complete protection of the HCV.

WWF Global 200 Ecoregion - Southeastern Coniferous & Broadleaf Forests

- 3. The Southeastern mixed forests (NA0413)
 - b) WWF has declared more than 99% of this ecoregion having been converted. The remaining examples of this HCV are known to occur on protected lands.
- 4. The Southeastern conifer forests (NA0529)
 - c) As stated above, WWF has declared most of this HCV has been reduced to less than 1% of its original size. The remaining examples of this HCV are known to occur on protected lands.
 - d) While the BP does use some longleaf pine (*Pinus palustris*), the company tracks the use of this species through the monitoring of its direct purchases of wood from the forest and through its secondary suppliers that are audited on an annual basis. Most longleaf pine purchased can be documented not coming from HCV areas as described by FSC HCV framework organizations.
 - e) The BP actively partners with the Longleaf Alliance through its membership in the Georgia Forestry Association and the Georgia SFI State Implementation Committee. Financial and in-kind support is documented for the education and awareness of private forest landowners implementing sustainable forestry practices.

| | Indicator |
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| 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 | The BP's SBP Supply Base Risk Assessment assessed the threat of feedstock being sourced from forests converted to production plantation forest or non-forest lands after January 2008 within the supply area. This risk assessment used FSC's National Risk Assessment for the Conterminous United States of America (FSC-NRA-USA V1-0) and USDA Forest Service Forest Inventory and Analysis (FIA) data. While the FSC NRA identified 15 counties within the BP's supply area as areas where there is a risk greater than "low" receiving forest materials from forest conversions, the most current FIA data for the BP's supply area as having lost 54,781 acres of forestlands since 2008 which is a 0.18% decrease since 2008 or 0.02% annually. |
| Means of Verification | <ul style="list-style-type: none"> • VWP-DOC-008a SBP Supply Base Risk Assessment • National Risk Assessment for the Conterminous United States of America (FSC-NRA-USA V1-0) • USDA Forest Service Forest Inventory and Analysis (FIA) data • Supplier Agreements • VWP-DOC-004 Landowner Survey BMP Compliance • VWP-DOC-016 Secondary Supplier Audit Checklist |
| Evidence Reviewed | <ul style="list-style-type: none"> • VWP-DOC-008a SBP Supply Base Risk Assessment • National Risk Assessment for the Conterminous United States of America (FSC-NRA-USA V1-0) • USDA Forest Service Forest Inventory and Analysis (FIA) data https://apps.fs.usda.gov/Evalidator/evaluator.jsp • Supplier Agreements • VWP-DOC-004 Landowner Survey BMP Compliance • VWP-DOC-016 Secondary Supplier Audit Checklist |
| Risk Rating | <input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | <p>3. BP Supplier Agreements prohibit suppliers 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.</p> <p>4. BP monitors compliance through BMP audits and records compliance on the BMP compliance checklist as well as Secondary Supplier Audits.</p> |

| | Indicator |
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| 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>The BP is certified to the Sustainable Forestry Initiative (SFI) Fiber Sourcing Standard and has implemented procedures meeting this standard that verify feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them. SFI Fiber Sourcing requires environmental assessments of harvest areas, harvest planning to minimize impacts, the implementation of best management practices (BMPs) and the use of qualified logging professionals.</p> <p>To ensure these standards are met, BP Supplier Agreements require all feedstock suppliers to harvest fiber in compliance with state BMPs and to maintain SFI State Implementation Committee (SIC) logger training requirements to control the impact on the forests. The BP annually accesses state SIC logger training databases to verify logger</p> |

| | <p>training status and conducts BMP compliance checks to verify supplier compliance with BMPs for primary feedstock.</p> <p>Two of the three BP's external secondary feedstock suppliers are also certified to the SFI Fiber Sourcing Standard. These suppliers are 3rd party certified with verified BMP compliance monitoring programs. All suppliers require their suppliers and loggers to maintain SIC logger training.</p> <p>In addition state forestry agencies conduct BMP compliance checks randomly or upon request by stakeholders. Most recent state BMP compliance reports state BMP compliance is above 90% compliance.</p> <table border="1" data-bbox="678 504 1099 663"> <thead> <tr> <th>State</th> <th>Overall BMP Compliance %</th> </tr> </thead> <tbody> <tr> <td>Alabama</td> <td>98.3%</td> </tr> <tr> <td>Florida</td> <td>99.6%</td> </tr> <tr> <td>Georgia</td> <td>94.4%</td> </tr> </tbody> </table> | State | Overall BMP Compliance % | Alabama | 98.3% | Florida | 99.6% | Georgia | 94.4% |
|-------------------------------|--|-------|--------------------------|---------|-------|---------|-------|---------|-------|
| State | Overall BMP Compliance % | | | | | | | | |
| Alabama | 98.3% | | | | | | | | |
| Florida | 99.6% | | | | | | | | |
| Georgia | 94.4% | | | | | | | | |
| Means of Verification | <ul style="list-style-type: none"> • SFI Fiber Sourcing Certificates • Supplier Agreements & Logging Contracts • VWP-DOC-004 Landowner Survey BMP Compliance • VWP-DOC-016 Secondary Supplier Audit Checklist • State SIC Logger Training databases • State forestry BMP compliance reports | | | | | | | | |
| Evidence Reviewed | <ul style="list-style-type: none"> • SFI Certification Database https://sfidatabase.org/ • Supplier Agreements & Logging Contracts • VWP-DOC-004 Landowner Survey BMP Compliance • VWP-DOC-016 Secondary Supplier Audit Checklist • State BMP Manuals <ul style="list-style-type: none"> ○ AL: https://forestry.alabama.gov/Pages/Management/Forms/2007_BMP_Manual.pdf ○ FL: http://www.freshfromflorida.com/Divisions-Offices/Florida-Forest-Service/Our-Forests/Best-Management-Practices-BMP ○ GA: https://gatrees.org/wp-content/uploads/2020/02/BMP-Manual-2019-Web.pdf • Alabama Professional Logging Manager https://www.alaforestry.org/page/PLMGeneral • Florida Master Logger http://floridaforest.org/programs/master-logger/master-logger-search-tool/ • Georgia Master Timber Harvester http://gamth.org/ • Alabama Annual BMP Reports http://www.forestry.alabama.gov/Pages/Management/BMP_Practices.aspx • Florida Silviculture Best Management Practices 2017 Implementation Survey Report https://www.freshfromflorida.com/content/download/78966/2320474/SPMP_2017_ImplementationSurveyReport.pdf • Results of Georgia's 2019 Silvicultural Best Management Practices Implementation and Compliance Survey https://gatrees.org/wp-content/uploads/2020/02/2019_Forestry_BMP_Survey_Highlights_Draft1_Scott_Jan10_2020_238pm_sent-WendyAnd-ScottgToReview.pdf | | | | | | | | |
| Risk Rating | <input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA | | | | | | | | |
| Comment or Mitigation Measure | <ol style="list-style-type: none"> 7. BP maintains SFI Fiber Sourcing certification. 8. BP's Supplier Agreements and Logging Contracts contain requirements for suppliers to comply with state BMP guidelines. 9. BP conducts BMP compliance audits on harvest tracts that provide feedstock to the BP's sawmill. 10. BP annually accesses state SIC logger training databases to verify logger training status and conducts BMP compliance checks to verify supplier compliance with BMPs for primary feedstock. 11. BP annually audits secondary suppliers to evaluate their BMP compliance and use of qualified logging professionals. | | | | | | | | |

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| | 12. BP reviews state BMP compliance reports. |
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| | Indicator | | | | | | | | |
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| 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>The BP is certified to the Sustainable Forestry Initiative (SFI) Fiber Sourcing Standard and has implemented procedures meeting this standard that verify feedstock is sourced from forests where management maintains or improves soil quality. SFI Fiber Sourcing requires environmental assessments of harvest areas, harvest planning to minimize impacts, the implementation of best management practices (BMPs) and the use of qualified logging professionals.</p> <p>To ensure these standards are met, BP Supplier Agreements require all feedstock suppliers to harvest fiber in compliance with state BMPs and to maintain SFI State Implementation Committee (SIC) logger training requirements to control the impact on the forests. The BP annually accesses state SIC logger training databases to verify logger training status and conducts BMP compliance checks to verify supplier compliance with BMPs for primary feedstock.</p> <p>Two of the three BP's external secondary feedstock suppliers are also certified to the SFI Fiber Sourcing Standard. These suppliers are 3rd party certified with verified BMP compliance monitoring programs. All suppliers require their suppliers and loggers to maintain SIC logger training.</p> <p>In addition state forestry agencies conduct BMP compliance checks randomly or upon request by stakeholders. Most recent state BMP compliance reports state BMP compliance is above 90% compliance.</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="background-color: #00728f; color: white;">State</th> <th style="background-color: #00728f; color: white;">Overall BMP Compliance %</th> </tr> </thead> <tbody> <tr> <td>Alabama</td> <td>98.3%</td> </tr> <tr> <td>Florida</td> <td>99.6%</td> </tr> <tr> <td>Georgia</td> <td>94.4%</td> </tr> </tbody> </table> <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> | State | Overall BMP Compliance % | Alabama | 98.3% | Florida | 99.6% | Georgia | 94.4% |
| State | Overall BMP Compliance % | | | | | | | | |
| Alabama | 98.3% | | | | | | | | |
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| Georgia | 94.4% | | | | | | | | |
| Means of Verification | <ul style="list-style-type: none"> • SFI Fiber Sourcing Certificates • Supplier Agreements & Logging Contracts • VWP-DOC-004 Landowner Survey BMP Compliance • VWP-DOC-016 Secondary Supplier Audit Checklist • State SIC Logger Training databases • State forestry BMP compliance reports | | | | | | | | |
| Evidence Reviewed | <ul style="list-style-type: none"> • SFI Certification Database https://sfidatabase.org/ • Supplier Agreements & Logging Contracts • VWP-DOC-004 Landowner Survey BMP Compliance • VWP-DOC-016 Secondary Supplier Audit Checklist • State BMP Manuals <ul style="list-style-type: none"> ○ AL: https://forestry.alabama.gov/Pages/Management/Forms/2007_BMP_Manual.pdf ○ FL: http://www.freshfromflorida.com/Divisions-Offices/Florida-Forest-Service/Our-Forests/Best-Management-Practices-BMP ○ GA: https://gatrees.org/wp-content/uploads/2020/02/BMP-Manual-2019-Web.pdf • Alabama Professional Logging Manager https://www.alaforestry.org/page/PLMGeneral • Florida Master Logger http://floridaforest.org/programs/master-logger/master-logger-search-tool/ | | | | | | | | |

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| | <ul style="list-style-type: none"> Georgia Master Timber Harvester http://gamth.org/ Alabama Annual BMP Reports http://www.forestry.alabama.gov/Pages/Management/BMP_Practices.aspx Florida Silviculture Best Management Practices 2017 Implementation Survey Report https://www.freshfromflorida.com/content/download/78966/2320474/SPMP_2017_ImplementationSurveyReport.pdf Results of Georgia's 2019 Silvicultural Best Management Practices Implementation and Compliance Survey https://gatrees.org/wp-content/uploads/2020/02/2019_Forestry_BMP_Survey_Highlights_Draft1_Scott_Jan102020_238pm_sent-WendyAnd-ScottgToReview.pdf USGS Soils Map Database https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx |
| Risk Rating | <input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | <ol style="list-style-type: none"> BP maintains SFI Fiber Sourcing certification. BP's Supplier Agreements and Logging Contracts contain requirements for suppliers to comply with state BMP guidelines. BP conducts BMP compliance audits on harvest tracts that provide feedstock to the BP's sawmill. BP annually accesses state SIC logger training databases to verify logger training status and conducts BMP compliance checks to verify supplier compliance with BMPs for primary feedstock. BP annually audits secondary suppliers to evaluate their BMP compliance and use of qualified logging professionals. BP reviews state BMP compliance reports. |

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| 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>The BP's PEFC Due Diligence and SBP Supply Base Risk Assessments assessed the potential threats to ensure that key ecosystems and habitats are conserved or set aside in their natural state within the supply area. These risk assessments using FSC's National Risk Assessment for the Conterminous United States of America (FSC-NRA-USA V1-0) and other reputable conservation initiatives identified and mapped the presence or absence of the following high conservation value areas (HCVs) within the company's supply base.</p> <p>The following HCVs have been identified and mapped within the company's supply area and are assessed below. HCVs identified and assessed as "specified risk" will include describe measures to mitigate risks to a "low risk" level.</p> <p>The National Risk Assessment for the Conterminous United States of America (FSC-NRA-USA V1-0) has identified the following HCVs that are located within VWP's supply area.</p> <ul style="list-style-type: none"> HCV1: Species Diversity <ul style="list-style-type: none"> Central Florida CBA Florida Panhandle CBA HCV3: Rare Ecosystems <ul style="list-style-type: none"> Late Successional Bottomland Hardwoods Native Longleaf Pine Systems <p>Within the BP's supply area there are other HCVs associated from the high conservation value assessment frameworks identified below.</p> |

- Alliance for Zero Extinction (AZE) – There are three (3) AZE sites identified with the BP’s supply area.
 1. Auchilla Wildlife Management Area – This AZE site is triggered by Big Blue Spring crayfish (*Procambarus horsti*). This species is on the IUCN Red List and is classified as endangered. The entire known population is confined to this site. The Aucilla Wildlife Management Area covers 50,471 acres in the area between and around the Aucilla and Wacissa rivers. The Aucilla River originates from artesian springs in southern Georgia and becomes a blackwater stream as it twists its way through Florida to the Gulf of Mexico. Aucilla WMA is a mature hardwood forest and is one of the earliest sites of human habitation in North America.
 2. Ocala National Forest – This AZE site triggered by the Silver Glen Springs crayfish (*Procambarus attiguus*) and the big-cheeked cave crayfish (*Procambarus delicatus*). Entire known population of both species confined to this site. The Ocala National Forest is the second largest nationally protected forest in the state of Florida. It covers 607 square miles (1,570 km²) of Central Florida. The Ocala National Forest, established in 1908, is the oldest national forest east of the Mississippi River and the southernmost national forest in the continental U.S.
 3. Torreya State Park – This state park is located within the wood basin in Liberty County, Florida. The park protects the bulk of extant occurrences within the natural range of the Florida Torreya, *Torreya taxifolia*. Two additional protected areas near the park protect additional Torreya occurrences. The Florida Torreya, the target species within this AZE site, is a tree that is 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 Florida torreya originally comprised about 4% of the forest in this area. Its wood was used primarily for fence posts. A fungal blight destroyed the population. Associate tree species included 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.
- IUCN Centre for Plant Diversity (CPD) – There are two HCV sites identified within the BP’s defined supply area.
 1. NA25 - Eastern serpentine flora is restricted to soils derived from serpentine rock outcrops found in association with ultramafic rock. NA25 is restricted to the Piedmont physiographic province and is found in Columbia County, GA within the VWP supply area. Serpentine soils, associated with ultramafic bedrock, formed along a linear boundary between ancient continents. There are two of these zones in North America, one on the west coast and another on the east coast. The eastern zone extends from Alabama north into Quebec. Serpentine soils have relatively higher levels of heavy metals (cadmium and nickel) and lower levels of calcium than other soils. Therefore, are toxic to most plants. Clays in serpentine soils have a high affinity for water, more so than other clays, making less water available to plants. Plants found in this CPD are specialists. They are adapted to the harsh conditions created by these soils and cannot survive outside of this habitat, making them obligate endemics to serpentine soils. As already stated, most plants cannot live in this environment.
 2. NA29 - The Central Highlands of Florida overlaps the southern-most portion of the VWP wood basin. The Lake Wales Region within NA29 is an elevated region of Florida that was dry during the most recent interglacial period of the Ice Age. This CPD contains 41 species of endemic vascular plant species found in scrub habitat with an overstory of sand pine. The ecological value of the area is its high level of plant endemism. The greatest threats to this CPD comes from conversion of native habitat for citrus production, recreation, as well as commercial and residential development.
- Critical Ecosystem Partnership Fund – North American Coastal Plain was added to the Biodiversity Hotspot list in 2016. The North American Coastal Plain reaches from a small section of northern Mexico along the Gulf of Mexico and up the East Coast to southeastern Massachusetts. Despite the 1,816 endemic plant species and the 1.13

million square kilometers of area, the hotspot has a low level of geographic variety and an unusually low level of elevation change when compared to the other hotspots, leading the scientific community to assume it would be less biodiverse. This vast designation includes all the other HCVs described within this risk assessment at a more site specific scale.

- GreenPeace Intact Forest - A Greenpeace Intact Forest is located in Charlton and Ware Counties, GA which is within the VWP defined supply area. 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. There are 353,000 acres designated as a National Wilderness Area within the refuge. Two small fingers of the Greenpeace Intact Forest extend into the Dixon Memorial Wildlife Management Area which is a state-owned forest and beyond the northern end of the refuge. The remainder of the intact forest is within the Okefenokee National Wildlife Refuge where it receives federal protection from the Department of the Interior.
- World Wildlife Fund (WWF), Global 200 Ecoregion - Southeastern Coniferous & Broadleaf Forests (# 75 in the WWF Global 200)

The WWF'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.

Almost all of the counties located in the BP’s defined supply area are in the Southeastern Coniferous & Broadleaf Forests which has a conservation status of endangered/critical. It is significant at a global scale, but this *global* ecoregion (#75) is subdivided into two smaller endangered/critical terrestrial ecoregions. These scaled-down subdivisions have significance at the national level.

1. The Southeastern mixed forests (NA0413) - located in a few counties in the northern end of the VWP wood basin. This is a highly degraded ecoregion with more than 99% of the original habitat having been converted to other uses. Settlers within the ecoregion logged and then cleared the land for agriculture. The ecoregion overlaps and is synonymous with the Piedmont physiographic province along 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. There are multiple examples of protected areas within this ecoregion.
2. The Southeastern conifer forests (NA0529) - the second terrestrial ecoregion that takes up the global ecoregion # 75. The majority of the VWP wood basin overlaps this ecoregion. The ecoregion 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 a longleaf pine overstory and an exceptionally diverse array of plants in the understory and especially in the herbaceous layer. The entire ecology of this region was driven by fire which maintained a longleaf pine dominance in the overstory. 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 eventually 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,

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| | there has been an increase in longleaf plantations over the past decade with an increase in newly planted acres every year within the ecoregion. |
| Means of Verification | <ul style="list-style-type: none"> • Risk assessments • Supplier Agreements and Logging Contracts • Company policy and procedures • BMP Compliance checklists • Supplier checklists |
| Evidence Reviewed | <ul style="list-style-type: none"> • VWP-DOC-008 PEFC Due Diligence Risk Assessment • VWP-DOC-008a SBP Supply Base Risk assessment • VWP-POL-002 Sustainable Forestry Policy • VWP-PROC-001 SFI Fiber Sourcing Procedures • VWP-DOC-004 Landowner Survey BMP Compliance • VWP-DOC-016 Secondary Supplier Audit Checklist • Supplier Agreements and Logging Contracts |
| Risk Rating | <input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | <p><u>Central Florida CBA</u></p> <ol style="list-style-type: none"> 1. The BP has contracted with Greener Options, Inc. to assist in the development and implementation of BP's certification programs. Greener Options, Inc. working with Biological Integrity, LLC attended the three FSC US Controlled Wood Regional meeting held in 2018. Mark Hughes, PhD, owner of Biological Integrity, LLC attended the Southeast Region meeting on July 31, 2018 in Atlanta, GA. Hughes actively participated in the discussion of mitigating measures for the HCVs during this meeting. Gary Boyd, owner of Greener Options, Inc. has reviewed the FSC US Controlled Wood Regional Meeting final report findings with the BP specifically on recommended mitigation measures for the Central FL CBA. 2. The BP will work with suppliers who source wood fiber from this area to educate their suppliers, their loggers and landowners on the social benefits and values of pine flatwoods, threats from incompatible forest management activities, and opportunities for conservation through management that enhances biodiversity and reduces or eliminates these threats. This education and outreach measure will be documented using Secondary Supplier Audit Checklists. <p><u>Florida Panhandle CBA</u></p> <ol style="list-style-type: none"> 1. The BP has contracted with Greener Options, Inc. to assist in the development and implementation of BP's certification programs. Greener Options, Inc. working with Biological Integrity, LLC attended the three FSC US Controlled Wood Regional meeting held in 2018. Mark Hughes, PhD, owner of Biological Integrity, LLC attended the Southeast Region meeting on July 31, 2018 in Atlanta, GA. Hughes actively participated in the discussion of mitigating measures for the HCVs during this meeting. Gary Boyd, Greener Options, Inc., has reviewed the FSC US Controlled Wood Regional Meeting final report findings with the BP specifically on recommended mitigation measures for the FL Panhandle CBA. 2. The BP 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 and Native Longleaf Pine Systems, 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 Secondary Supplier Audit Checklists. <p><u>Late Successional Bottomland Hardwoods (LSBH)</u></p> <ol style="list-style-type: none"> 1. The BP only purchases southern pine (<i>Pinus taeda</i>, <i>Pinus elliottii</i>, <i>Pinus palustris</i>, <i>Pinus serotina</i>, <i>Pinus echinata</i>) for its sawmill and wood pellet facility. These species are not commercially found in this HCV. |

2. The BP has contracted with Greener Options, Inc. to assist in the development and implementation of BP's certification programs. Greener Options, Inc. working with Biological Integrity, LLC attended the three FSC US Controlled Wood Regional meeting held in 2018. Mark Hughes, PhD, owner of Biological Integrity, LLC attended the Southeast Region meeting on July 31, 2018 in Atlanta, GA. Hughes actively participated in the discussion of mitigating measures for the HCVs during this meeting.

Gary Boyd, Greener Options, Inc. has reviewed the FSC US Controlled Wood Regional Meeting final report findings with the BP specifically on recommended mitigation measures for LSBH.

3. The BP 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 Secondary Supplier Audit Checklists.

Native Longleaf Pine Systems (NLPS)

1. The BP has contracted with Greener Options, Inc. to assist in the development and implementation of BP's certification programs. Greener Options, Inc. working with Biological Integrity, LLC attended the three FSC US Controlled Wood Regional meeting held in 2018. Mark Hughes, PhD, owner of Biological Integrity, LLC attended the Southeast Region meeting on July 31, 2018 in Atlanta, GA. Hughes actively participated in the discussion of mitigating measures for the HCVs during this meeting.

Gary Boyd, Greener Options, Inc. has reviewed the FSC US Controlled Wood Regional Meeting final report findings with the BP specifically on recommended mitigation measures for the NLPS.

2. The BP 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 fire to NLPS. This education and outreach measure will be documented using Secondary Supplier Audit Checklists.
3. The BP actively partners with the Longleaf Alliance through its membership in the Georgia Forestry Association and the Georgia SFI State Implementation Committee. Financial and in-kind support is documented for the education and awareness of private forest landowners implementing sustainable forestry practices.

Alliance for Zero Extinction (AZE)

1. Auchilla Wildlife Management Area
 - a) The BP only purchases southern pine (*Pinus taeda*, *Pinus elliottii*, *Pinus palustris*, *Pinus serotina*, *Pinus echinata*) for its sawmill and wood pellet facility. These species are not commercially found in this HCV as stated above.
 - b) There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.
2. Ocala National Forest
 - a) There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.
 - b) If wood is harvested from the National Forest, the USDA Forest Service conducts environment impact studies, stakeholder consultations and oversees all timber harvesting on these forests within the HCV providing complete protection of the HCV.
3. Torreya State Park
 - a) The BP only purchases southern pine (*Pinus taeda*, *Pinus elliottii*, *Pinus palustris*, *Pinus serotina*, *Pinus echinata*) for its sawmill and wood pellet facility. These species are not commercially found in this HCV as stated above.
 - b) There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.

IUCN Centre for Plant Diversity (CPD)

1. NA25 - Eastern serpentine flora
 - a) The BP only purchases southern pine (*Pinus taeda*, *Pinus elliottii*, *Pinus palustris*, *Pinus serotina*, *Pinus echinata*) for its sawmill and wood pellet facility. These species are not commercially found in this HCV as stated above.
 - b) There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.
2. NA29 - The Central Highlands of Florida
 - a) The BP only purchases southern pine (*Pinus taeda*, *Pinus elliottii*, *Pinus palustris*, *Pinus serotina*, *Pinus echinata*) for its sawmill and wood pellet facility. Sand pine (*Pinus clausa*), which is the predominant overstory species for the is HCV, is not purchased or used.
 - b) There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.

Critical Ecosystem Partnership Fund

1. This vast designation includes all the other HCVs described within this risk assessment at a more site specific scale.
2. There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.

GreenPeace Intact Forest

1. There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.
2. No wood is harvested out of the described National Wilderness Area which is managed by the Department of Interior. If wood is harvested from the surrounding forests described above, The Department of Interior and the Georgia Forestry Commission conducts environment impact studies and oversees all timber harvesting on these forests within the HCV providing complete protection of the HCV.

WWF Global 200 Ecoregion - Southeastern Coniferous & Broadleaf Forests

1. The Southeastern mixed forests (NA0413)
 - a) WWF has declared more than 99% of this ecoregion having been converted. The remaining examples of this HCV are known to occur on protected lands.
2. The Southeastern conifer forests (NA0529)
 - a) As stated above, WWF has declared most of this HCV has been reduced to less than 1% of its original size. The remaining examples of this HCV are known to occur on protected lands.
 - b) While the BP does use some longleaf pine (*Pinus palustris*), the company tracks the use of this species through the monitoring of its direct purchases of wood from the forest and through its secondary suppliers that are audited on an annual basis. Most longleaf pine purchased can be documented not coming from HCV areas as described by FSC HCV framework organizations.
 - c) The BP actively partners with the Longleaf Alliance through its membership in the Georgia Forestry Association and the Georgia SFI State Implementation Committee. Financial and in-kind support is documented for the education and awareness of private forest landowners implementing sustainable forestry practices.

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| 2.2.4 | The Biomass Producer has implemented appropriate control systems and procedures to ensure that biodiversity is protected (CPET S5b). |
| Finding | <p>The Protected Areas Database of the United States (PAD-US) is the official inventory of public parks and other protected open space. The spatial data in PAD-US represents public lands held in trust by thousands of national, state and regional/local governments, as well as non-profit conservation organizations. Protected Areas account for 15.2% of the area with the BP's supply area and are protected from uncontrolled forest management.</p> <p>The BP's PEFC Due Diligence and SBP Supply Base Risk Assessments assessed the potential threats to ensure that key ecosystems and habitats are conserved or set aside in their natural state within the supply area. These risk assessments using FSC's National Risk Assessment for the Conterminous United States of America (FSC-NRA-USA V1-0) and other reputable conservation initiatives identified and mapped the presence or absence of the following high conservation value areas (HCVs) within the company's supply base.</p> <p>The following HCVs have been identified and mapped within the company's supply area and are assessed below. HCVs identified and assessed as "specified risk" will include describe measures to mitigate risks to a "low risk" level.</p> <p>The National Risk Assessment for the Conterminous United States of America (FSC-NRA-USA V1-0) has identified the following HCVs that are located within VWP's supply area.</p> <ul style="list-style-type: none"> • HCV1: Species Diversity <ul style="list-style-type: none"> ○ Central Florida CBA ○ Florida Panhandle CBA • HCV3: Rare Ecosystems <ul style="list-style-type: none"> ○ Late Successional Bottomland Hardwoods ○ Native Longleaf Pine Systems <p>Within the BP's supply area there are other HCVs associated from the high conservation value assessment frameworks identified below.</p> <ul style="list-style-type: none"> • Alliance for Zero Extinction (AZE) – There are three (3) AZE sites identified with the BP's supply area. <ol style="list-style-type: none"> 1. Auchilla Wildlife Management Area – This AZE site is triggered by Big Blue Spring crayfish (<i>Procambarus horsti</i>). This species is on the IUCN Red List and is classified as endangered. The entire known population is confined to this site. The Aucilla Wildlife Management Area covers 50,471 acres in the area between and around the Aucilla and Wacissa rivers. The Aucilla River originates from artesian springs in southern Georgia and becomes a blackwater stream as it twists its way through Florida to the Gulf of Mexico. Aucilla WMA is a mature hardwood forest and is one of the earliest sites of human habitation in North America. 2. Ocala National Forest – This AZE site triggered by the Silver Glen Springs crayfish (<i>Procambarus attiguus</i>) and the big-cheeked cave crayfish (<i>Procambarus delicatus</i>). Entire known population of both species confined to this site. The Ocala National Forest is the second largest nationally protected forest in the state of Florida. It covers 607 square miles (1,570 km²) of Central Florida. The Ocala National Forest, established in 1908, is the oldest national forest east of the Mississippi River and the southernmost national forest in the continental U.S. 3. Torreya State Park – This state park is located within the wood basin in Liberty County, Florida. The park protects the bulk of extant occurrences within the natural range of the Florida Torreya, <i>Torreya taxifolia</i>. Two additional protected areas near the park protect additional Torreya occurrences. The Florida Torreya, the target species within this AZE site, is a tree that is 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 Florida torreya originally |

comprised about 4% of the forest in this area. Its wood was used primarily for fence posts. A fungal blight destroyed the population. Associate tree species included 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.

- IUCN Centre for Plant Diversity (CPD) – There are two HCV sites identified within the BP’s defined supply area.
 1. NA25 - Eastern serpentine flora is restricted to soils derived from serpentine rock outcrops found in association with ultramafic rock. NA25 is restricted to the Piedmont physiographic province and is found in Columbia County, GA within the VWP supply area. Serpentine soils, associated with ultramafic bedrock, formed along a linear boundary between ancient continents. There are two of these zones in North America, one on the west coast and another on the east coast. The eastern zone extends from Alabama north into Quebec. Serpentine soils have relatively higher levels of heavy metals (cadmium and nickel) and lower levels of calcium than other soils. Therefore, are toxic to most plants. Clays in serpentine soils have a high affinity for water, more so than other clays, making less water available to plants. Plants found in this CPD are specialists. They are adapted to the harsh conditions created by these soils and cannot survive outside of this habitat, making them obligate endemics to serpentine soils. As already stated, most plants cannot live in this environment.
 2. NA29 - The Central Highlands of Florida overlaps the southern-most portion of the VWP wood basin. The Lake Wales Region within NA29 is an elevated region of Florida that was dry during the most recent interglacial period of the Ice Age. This CPD contains 41 species of endemic vascular plant species found in scrub habitat with an overstory of sand pine. The ecological value of the area is its high level of plant endemism. The greatest threats to this CPD comes from conversion of native habitat for citrus production, recreation, as well as commercial and residential development.
- Critical Ecosystem Partnership Fund – North American Coastal Plain was added to the Biodiversity Hotspot list in 2016. The North American Coastal Plain reaches from a small section of northern Mexico along the Gulf of Mexico and up the East Coast to southeastern Massachusetts. Despite the 1,816 endemic plant species and the 1.13 million square kilometers of area, the hotspot has a low level of geographic variety and an unusually low level of elevation change when compared to the other hotspots, leading the scientific community to assume it would be less biodiverse. This vast designation includes all the other HCVs described within this risk assessment at a more site specific scale.
- GreenPeace Intact Forest - A Greenpeace Intact Forest is located in Charlton and Ware Counties, GA which is within the VWP defined supply area. 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. There are 353,000 acres designated as a National Wilderness Area within the refuge. Two small fingers of the Greenpeace Intact Forest extend into the Dixon Memorial Wildlife Management Area which is a state-owned forest and beyond the northern end of the refuge. The remainder of the intact forest is within the Okefenokee National Wildlife Refuge where it receives federal protection from the Department of the Interior.
- World Wildlife Fund (WWF), Global 200 Ecoregion - Southeastern Coniferous & Broadleaf Forests (# 75 in the WWF Global 200)

The WWF'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. Almost all of the counties located in the BP’s defined supply area are in the Southeastern Coniferous & Broadleaf Forests which has a conservation status of

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| | <p>endangered/critical. 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.</p> <ol style="list-style-type: none"> 1. The <u>Southeastern mixed forests (NA0413)</u> - located in a few counties in the northern end of the VWP wood basin. This is a highly degraded ecoregion with more than 99% of the original habitat having been converted to other uses. Settlers within the ecoregion logged and then cleared the land for agriculture. The ecoregion overlaps and is synonymous with the Piedmont physiographic province along 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. There are multiple examples of protected areas within this ecoregion. 2. The <u>Southeastern conifer forests (NA0529)</u> - the second terrestrial ecoregion that takes up the global ecoregion # 75. The majority of the VWP wood basin overlaps this ecoregion. The ecoregion 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>This ecoregion is equated with the longleaf pine ecosystem that once spanned a significant portion of the coastal plain. It was dominated by a longleaf pine overstory and an exceptionally diverse array of plants in the understory and especially in the herbaceous layer. The entire ecology of this region was driven by fire which maintained a longleaf pine dominance in the overstory. 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 eventually 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> |
| Means of Verification | <ul style="list-style-type: none"> • Risk assessments • Supplier Agreements and Logging Contracts • Company policy and procedures • BMP Compliance checklists • Supplier checklists |
| Evidence Reviewed | <ul style="list-style-type: none"> • VWP-DOC-008 PEFC Due Diligence Risk Assessment • VWP-DOC-008a SBP Supply Base Risk assessment • VWP-POL-002 Sustainable Forestry Policy • VWP-PROC-001 SFI Fiber Sourcing Procedures • VWP-DOC-004 Landowner Survey BMP Compliance • VWP-DOC-016 Secondary Supplier Audit Checklist • Supplier Agreements and Logging Contracts • Protected Areas Database of the United States (PAD-US) https://www.usgs.gov/core-science-systems/science-analytics-and-synthesis/gap/science/protected-areas |
| Risk Rating | <input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | <p><u>Central Florida CBA</u></p> <ol style="list-style-type: none"> 1. The BP has contracted with Greener Options, Inc. to assist in the development and implementation of BP's certification programs. Greener Options, Inc. working with Biological Integrity, LLC attended the three FSC US Controlled Wood Regional |

meeting held in 2018. Mark Hughes, PhD, owner of Biological Integrity, LLC attended the Southeast Region meeting on July 31, 2018 in Atlanta, GA. Hughes actively participated in the discussion of mitigating measures for the HCVs during this meeting.

Gary Boyd, owner of Greener Options, Inc. has reviewed the FSC US Controlled Wood Regional Meeting final report findings with the BP specifically on recommended mitigation measures for the Central FL CBA.

2. The BP will work with suppliers who source wood fiber from this area to educate their suppliers, their loggers and landowners on the social benefits and values of pine flatwoods, threats from incompatible forest management activities, and opportunities for conservation through management that enhances biodiversity and reduces or eliminates these threats. This education and outreach measure will be documented using Secondary Supplier Audit Checklists.

Florida Panhandle CBA

1. The BP has contracted with Greener Options, Inc. to assist in the development and implementation of BP's certification programs. Greener Options, Inc. working with Biological Integrity, LLC attended the three FSC US Controlled Wood Regional meeting held in 2018. Mark Hughes, PhD, owner of Biological Integrity, LLC attended the Southeast Region meeting on July 31, 2018 in Atlanta, GA. Hughes actively participated in the discussion of mitigating measures for the HCVs during this meeting.

Gary Boyd, Greener Options, Inc., has reviewed the FSC US Controlled Wood Regional Meeting final report findings with the BP specifically on recommended mitigation measures for the FL Panhandle CBA.

2. The BP 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 and Native Longleaf Pine Systems, 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 Secondary Supplier Audit Checklists.

Late Successional Bottomland Hardwoods (LSBH)

1. The BP only purchases southern pine (*Pinus taeda*, *Pinus elliottii*, *Pinus palustris*, *Pinus serotina*, *Pinus echinata*) for its sawmill and wood pellet facility. These species are not commercially found in this HCV.

2. The BP has contracted with Greener Options, Inc. to assist in the development and implementation of BP's certification programs. Greener Options, Inc. working with Biological Integrity, LLC attended the three FSC US Controlled Wood Regional meeting held in 2018. Mark Hughes, PhD, owner of Biological Integrity, LLC attended the Southeast Region meeting on July 31, 2018 in Atlanta, GA. Hughes actively participated in the discussion of mitigating measures for the HCVs during this meeting.

Gary Boyd, Greener Options, Inc. has reviewed the FSC US Controlled Wood Regional Meeting final report findings with the BP specifically on recommended mitigation measures for LSBH.

3. The BP 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 Secondary Supplier Audit Checklists.

Native Longleaf Pine Systems (NLPS)

1. The BP has contracted with Greener Options, Inc. to assist in the development and implementation of BP's certification programs. Greener Options, Inc. working with Biological Integrity, LLC attended the three FSC US Controlled Wood Regional meeting held in 2018. Mark Hughes, PhD, owner of Biological Integrity, LLC attended the Southeast Region meeting on July 31, 2018 in Atlanta, GA. Hughes actively

participated in the discussion of mitigating measures for the HCVs during this meeting.

Gary Boyd, Greener Options, Inc. has reviewed the FSC US Controlled Wood Regional Meeting final report findings with the BP specifically on recommended mitigation measures for the NLPS.

2. The BP 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 fire to NLPS. This education and outreach measure will be documented using Secondary Supplier Audit Checklists.
3. The BP actively partners with the Longleaf Alliance through its membership in the Georgia Forestry Association and the Georgia SFI State Implementation Committee. Financial and in-kind support is documented for the education and awareness of private forest landowners implementing sustainable forestry practices.

Alliance for Zero Extinction (AZE)

1. Auchilla Wildlife Management Area
 - a) The BP only purchases southern pine (*Pinus taeda*, *Pinus elliotii*, *Pinus palustris*, *Pinus serotina*, *Pinus echinata*) for its sawmill and wood pellet facility. These species are not commercially found in this HCV as stated above.
 - b) There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.
2. Ocala National Forest
 - a) There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.
 - b) If wood is harvested from the National Forest, the USDA Forest Service conducts environment impact studies, stakeholder consultations and oversees all timber harvesting on these forests within the HCV providing complete protection of the HCV.
3. Torreya State Park
 - a) The BP only purchases southern pine (*Pinus taeda*, *Pinus elliotii*, *Pinus palustris*, *Pinus serotina*, *Pinus echinata*) for its sawmill and wood pellet facility. These species are not commercially found in this HCV as stated above.
 - b) There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.

IUCN Centre for Plant Diversity (CPD)

1. NA25 - Eastern serpentine flora
 - a) The BP only purchases southern pine (*Pinus taeda*, *Pinus elliotii*, *Pinus palustris*, *Pinus serotina*, *Pinus echinata*) for its sawmill and wood pellet facility. These species are not commercially found in this HCV as stated above.
 - b) There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.
2. NA29 - The Central Highlands of Florida
 - a) The BP only purchases southern pine (*Pinus taeda*, *Pinus elliotii*, *Pinus palustris*, *Pinus serotina*, *Pinus echinata*) for its sawmill and wood pellet facility. Sand pine (*Pinus clausa*), which is the predominant overstory species for the is HCV, is not purchased or used.
 - b) There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.

Critical Ecosystem Partnership Fund

1. This vast designation includes all the other HCVs described within this risk assessment at a more site specific scale.
2. There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.

GreenPeace Intact Forest

1. There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.

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| | <p>2. No wood is harvested out of the described National Wilderness Area which is managed by the Department of Interior. If wood is harvested from the surrounding forests described above, The Department of Interior and the Georgia Forestry Commission conducts environment impact studies and oversees all timber harvesting on these forests within the HCV providing complete protection of the HCV.</p> <p><u>WWF Global 200 Ecoregion - Southeastern Coniferous & Broadleaf Forests</u></p> <p>1. The Southeastern mixed forests (NA0413)</p> <p>a) WWF has declared more than 99% of this ecoregion having been converted. The remaining examples of this HCV are known to occur on protected lands.</p> <p>2. The Southeastern conifer forests (NA0529)</p> <p>a) As stated above, WWF has declared most of this HCV has been reduced to less than 1% of its original size. The remaining examples of this HCV are known to occur on protected lands.</p> <p>b) While the BP does use some longleaf pine (<i>Pinus palustris</i>), the company tracks the use of this species through the monitoring of its direct purchases of wood from the forest and through its secondary suppliers that are audited on an annual basis. Most longleaf pine purchased can be documented not coming from HCV areas as described by FSC HCV framework organizations.</p> <p>c) The BP actively partners with the Longleaf Alliance through its membership in the Georgia Forestry Association and the Georgia SFI State Implementation Committee. Financial and in-kind support is documented for the education and awareness of private forest landowners implementing sustainable forestry practices.</p> |
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| | 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 | <p>The BP is certified to the Sustainable Forestry Initiative (SFI) Fiber Sourcing Standard and has implemented procedures meeting this standard that verify the process of residue removal minimises harm to ecosystems. SFI Fiber Sourcing requires the implementation of best management practices (BMPs) and the use of qualified logging professionals. State BMP manuals in AL, FL & GA recommend scattering tops, limbs and other logging debris across harvest areas in skid trails and on temporary landings to minimize soil erosion.</p> <p>To ensure these standards are met, BP Supplier Agreements require all feedstock suppliers to harvest fiber in compliance with state BMPs and to maintain SFI State Implementation Committee (SIC) logger training requirements to control the impact on the forests. BMP Compliance Checklists are used to record wood utilization. The BP annually accesses state SIC logger training databases to verify logger training status and conducts BMP compliance checks to verify supplier compliance with BMPs for primary feedstock.</p> <p>Two of the three BP's external secondary feedstock suppliers are also certified to the SFI Fiber Sourcing Standard. These suppliers are 3rd party certified with verified BMP compliance monitoring programs. All suppliers require their suppliers and loggers to maintain SIC logger training.</p> <p>In addition state forestry agencies conduct BMP compliance checks randomly or upon request by stakeholders. Most recent state BMP compliance reports state BMP compliance is well above 90% compliance.</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="background-color: #0070C0; color: white;">State</th> <th style="background-color: #0070C0; color: white;">Overall BMP Compliance %</th> <th style="background-color: #0070C0; color: white;">Harvesting BMP Compliance %</th> </tr> </thead> <tbody> <tr> <td>Alabama</td> <td>98.3%</td> <td>98.7%</td> </tr> <tr> <td>Florida</td> <td>99.6%</td> <td>100%</td> </tr> <tr> <td>Georgia</td> <td>94.4%</td> <td>98.2%</td> </tr> </tbody> </table> | State | Overall BMP Compliance % | Harvesting BMP Compliance % | Alabama | 98.3% | 98.7% | Florida | 99.6% | 100% | Georgia | 94.4% | 98.2% |
| State | Overall BMP Compliance % | Harvesting BMP Compliance % | | | | | | | | | | | |
| Alabama | 98.3% | 98.7% | | | | | | | | | | | |
| Florida | 99.6% | 100% | | | | | | | | | | | |
| Georgia | 94.4% | 98.2% | | | | | | | | | | | |

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| | The Company has also distributed “Forest Biomass Retention and Harvesting Guidelines for the Southeast” from the Forest Guild to its suppliers as a tool to ensure biomass removal minimizes the harm to ecosystems. |
| Means of Verification | <ul style="list-style-type: none"> • SFI Fiber Sourcing Certificates • Supplier Agreements & Logging Contracts • VWP-DOC-004 Landowner Survey BMP Compliance • VWP-DOC-016 Secondary Supplier Audit Checklist • State SIC Logger Training databases • State forestry BMP compliance reports |
| Evidence Reviewed | <ul style="list-style-type: none"> • SFI Certification Database https://sfidatabase.org/ • Supplier Agreements & Logging Contracts • VWP-DOC-004 Landowner Survey BMP Compliance • VWP-DOC-016 Secondary Supplier Audit Checklist • State BMP Manuals <ul style="list-style-type: none"> ○ AL: https://forestry.alabama.gov/Pages/Management/Forms/2007_BMP_Manual.pdf ○ FL: http://www.freshfromflorida.com/Divisions-Offices/Florida-Forest-Service/Our-Forests/Best-Management-Practices-BMP ○ GA: https://gatrees.org/wp-content/uploads/2020/02/BMP-Manual-2019-Web.pdf • Alabama Professional Logging Manager https://www.alaforestry.org/page/PLMGeneral • Florida Master Logger http://floridaforest.org/programs/master-logger/master-logger-search-tool/ • Georgia Master Timber Harvester http://gamth.org/ • Alabama Annual BMP Reports http://www.forestry.alabama.gov/Pages/Management/BMP_Practices.aspx • Florida Silviculture Best Management Practices 2017 Implementation Survey Report https://www.freshfromflorida.com/content/download/78966/2320474/SPMP_2017_ImplementationSurveyReport.pdf • Results of Georgia’s 2019 Silvicultural Best Management Practices Implementation and Compliance Survey https://gatrees.org/wp-content/uploads/2020/02/2019_Forestry_BMP_Survey_Highlights_Draft1_Scott_Jan102_020_238pm_sent-WendyAnd-ScottgToReview.pdf • “Forest Biomass Retention and Harvesting Guidelines for the Southeast” (Forest Guild): https://foreststewardsguild.org/wp-content/uploads/2019/05/FG_Biomass_Guidelines_SE.pdf |
| Risk Rating | <input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | <ol style="list-style-type: none"> 7. BP maintains SFI Fiber Sourcing certification. 8. BP’s Supplier Agreements and Logging Contracts contain requirements for suppliers to comply with state BMP guidelines. 9. BP conducts BMP compliance audits on harvest tracts to provide feedstock to the BP’s sawmill. Wood utilization is an item that is audited as part of the audit process. 10. BP annually accesses state SIC logger training databases to verify logger training status and conducts BMP compliance checks to verify supplier compliance with BMPs for primary feedstock. 11. BP annually audits secondary suppliers to evaluate their BMP compliance, use of qualified logging professionals and distribution of the “Forest Biomass Retention and Harvesting Guidelines for the Southeast”. 12. BP reviews state BMP compliance reports. |

| | 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 BP 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 best management practices (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>The BP is certified to the Sustainable Forestry Initiative (SFI) Fiber Sourcing Standard and has implemented procedures meeting this standard that verify that negative impacts on ground water, surface water and water downstream from forest management are minimised . SFI Fiber Sourcing requires the implementation of BMPs and the use of qualified logging professionals.</p> <p>To ensure these standards are met, BP Supplier Agreements require all feedstock suppliers to harvest fiber in compliance with state BMPs and to maintain SFI State Implementation Committee (SIC) logger training requirements to control the impact on the forests. BMP Compliance Checklists are used to record wood utilization. The BP annually accesses state SIC logger training databases to verify logger training status and conducts BMP compliance checks to verify supplier compliance with BMPs for primary feedstock.</p> <p>Two of the three BP's external secondary feedstock suppliers are also certified to the SFI Fiber Sourcing Standard. These suppliers are 3rd party certified with verified BMP compliance monitoring programs. All suppliers require their suppliers and loggers to maintain SIC logger training.</p> <p>In addition state forestry agencies conduct BMP compliance checks randomly or upon request by stakeholders. Most recent state BMP compliance reports state BMP compliance is above 90% compliance.</p> <table border="1" data-bbox="678 1220 1101 1377"> <thead> <tr> <th>State</th> <th>Overall BMP Compliance %</th> </tr> </thead> <tbody> <tr> <td>Alabama</td> <td>98.3%</td> </tr> <tr> <td>Florida</td> <td>99.6%</td> </tr> <tr> <td>Georgia</td> <td>94.4%</td> </tr> </tbody> </table> | State | Overall BMP Compliance % | Alabama | 98.3% | Florida | 99.6% | Georgia | 94.4% |
| State | Overall BMP Compliance % | | | | | | | | |
| Alabama | 98.3% | | | | | | | | |
| Florida | 99.6% | | | | | | | | |
| Georgia | 94.4% | | | | | | | | |
| Means of Verification | <ul style="list-style-type: none"> • SFI Fiber Sourcing Certificates • Supplier Agreements & Logging Contracts • VWP-DOC-004 Landowner Survey BMP Compliance • VWP-DOC-016 Secondary Supplier Audit Checklist • State SIC Logger Training databases • State forestry BMP compliance reports | | | | | | | | |
| Evidence Reviewed | <ul style="list-style-type: none"> • SFI Certification Database https://sfidatabase.org/ • Supplier Agreements & Logging Contracts • VWP-DOC-004 Landowner Survey BMP Compliance • VWP-DOC-016 Secondary Supplier Audit Checklist • State BMP Manuals <ul style="list-style-type: none"> ○ AL: https://forestry.alabama.gov/Pages/Management/Forms/2007_BMP_Manual.pdf ○ FL: http://www.freshfromflorida.com/Divisions-Offices/Florida-Forest-Service/Our-Forests/Best-Management-Practices-BMP ○ GA: https://gatrees.org/wp-content/uploads/2020/02/BMP-Manual-2019-Web.pdf • Alabama Professional Logging Manager https://www.alaforestry.org/page/PLMGeneral • Florida Master Logger http://floridaforest.org/programs/master-logger/master-logger-search-tool/ • Georgia Master Timber Harvester | | | | | | | | |

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| | http://gamth.org/ <ul style="list-style-type: none"> Alabama Annual BMP Reports http://www.forestry.alabama.gov/Pages/Management/BMP_Practices.aspx Florida Silviculture Best Management Practices 2017 Implementation Survey Report https://www.freshfromflorida.com/content/download/78966/2320474/SPMP_2017_ImplementationSurveyReport.pdf Results of Georgia's 2019 Silvicultural Best Management Practices Implementation and Compliance Survey https://gatrees.org/wp-content/uploads/2020/02/2019_Forestry_BMP_Survey_Highlights_Draft1_Scott_Jan10_2020_238pm_sent-WendyAnd-ScottgToReview.pdf |
| Risk Rating | <input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | <ol style="list-style-type: none"> BP maintains SFI Fiber Sourcing certification. BP's Supplier Agreements and Logging Contracts contain requirements for suppliers to comply with state BMP guidelines. BP conducts BMP compliance audits on harvest tracts to provide feedstock to the BP's sawmill. BP annually accesses state SIC logger training databases to verify logger training status and conducts BMP compliance checks to verify supplier compliance with BMPs for primary feedstock. BP reviews state BMP compliance reports. |

| | Indicator |
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| 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 the BP does not conduct forest management activities (prescribed burning) that directly impacts air quality, they actively promote the use of prescribed burning to forest landowners as a sustainable forestry activity through its SFI Fiber Sourcing certification. The BP actively educates forest landowners about sustainable forestry by providing educational materials developed for forest landowners.</p> <p>This facility is located in a rural area in GA and purchases fiber from rural areas located in AL, FL & GA. Most of the BP's supply basin is located in areas outside of priority airsheds.</p> <p>State 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 BP's supply basin.</p> |
| Means of Verification | <ul style="list-style-type: none"> VWP-PROC-001 SFI Fiber Sourcing Procedures VWP-DOC-008a SBP Supply Base Risk Assessment State Forest Action Plans |
| Evidence Reviewed | <ul style="list-style-type: none"> VWP-PROC-001 SFI Fiber Sourcing Procedures VWP-DOC-008a SBP Supply Base Risk Assessment Forests at the Crossroads: Alabama's Forest Assessment and Resource Strategy (June 2010) - http://www.forestry.alabama.gov/Pages/Informational/Forms/Forests_at_the_Crossroads.pdf Forest Resources – 2010 Florida's Statewide Strategies https://www.fdacs.gov/content/download/81380/file/Florida_Forest_Resource_Strategy_6-18-10.pdf Georgia Statewide Assessment of Forest Resources (2015) https://gatrees.org/wp-content/uploads/2020/03/GAStatewideAssessmentofForestResources2015.pdf |

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| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

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| 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 | <p>While the BP does not conduct forest management activities which use forest chemicals, they actively promote the use of Integrated Pest Management to forest landowners as a sustainable forestry activity through their SFI Fiber Sourcing certification. The BP actively educates forest landowners about sustainable forestry by providing educational materials developed for landowners.</p> <p>The BP is a member of the Plantation Management Research Cooperative (PMRC) and actively participates on the Georgia SFI State Implementation Committee (SIC) as part of its SFI Fiber Sourcing certification. Participation in PMRC and the Georgia SIC enables BP 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, BP personnel keep informed of current forest management trends.</p> |
| Means of Verification | <ul style="list-style-type: none"> • Employee interviews • SFI Annual Progress Report |
| Evidence Reviewed | <ul style="list-style-type: none"> • VWP-PROC-002 SFI Fiber Sourcing Procedures • SFI Annual Progress Reports • PMRC Membership • GA SIC Meeting Minutes |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

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| 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 BP personnel. BP procedures require suppliers to maintain SFI training which includes modules addressing proper waste disposal. Supplier Agreements and Logging Contracts 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 | <ul style="list-style-type: none"> • State and Federal laws • State BMPs • Supplier Agreements and Logging Contracts • Master Logger Training records • BMP compliance checks |
| Evidence Reviewed | <ul style="list-style-type: none"> • Federal law <ul style="list-style-type: none"> ◦ CERCLA - 42 US Code Chapter 103: http://www.epa.gov/agriculture/lcla.html • State BMP Manuals <ul style="list-style-type: none"> ◦ AL: https://forestry.alabama.gov/Pages/Management/Forms/2007_BMP_Manual.pdf ◦ FL: http://www.freshfromflorida.com/Divisions-Offices/Florida-Forest-Service/Our-Forests/Best-Management-Practices-BMP ◦ GA: https://gatrees.org/wp-content/uploads/2020/02/BMP-Manual-2019-Web.pdf • AL BMP Compliance Report (2015-2016) • Results of Georgia's 2015 Silvicultural Best Management Practices Implementation and Compliance Survey • Florida Silviculture Best Management Practices 2017 Implementation Survey Report • Alabama Professional Logging Manager https://www.alaforestry.org/page/PLMGeneral • Florida Master Logger http://floridaforest.org/programs/master-logger/master-logger-search-tool/ • Georgia Master Timber Harvester http://gamth.org/ • VWP-POL-001 Sustainable Forestry Policy • VWP-PROC-001 SFI Fiber Sourcing Procedures • Supply Agreements and Logging Contracts • VWP-DOC-004 Landowner Survey BMP Compliance |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

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| 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. |

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| Finding | Harvest levels for the supply base in AL, GA and FL do not exceed growth according to USDA Forest Service forest inventory data. Forest Service removals, growth and mortality records for the most years (AL-2019; FL-2016; GA-2018) show a positive average rate of growth to removals (and mortality) at 1.29 for all wood. AL2019 data shows the state's growth-to-removals (and mortality) ratio was 1.66. FL 2016 data shows the state's growth-to-removals ratio was 1.64. GA2018 data shows the state's growth-to-removals ratio was 1.37. |
| Means of Verification | USDA Forest Service FIA data |
| Evidence Reviewed | <ul style="list-style-type: none"> USDA Forest Service Forest Inventory Analysis Data https://apps.fs.usda.gov/Evalidator/evaluator.jsp Forests of Georgia, 2015 – USDA Resource Update FS-RU-254 https://www.srs.fs.usda.gov/pubs/ru/ru_fs254.pdf Forests of Florida, 2016 – USDA Resource Update FS-RU-182 https://www.srs.fs.usda.gov/pubs/ru/ru_srs182.pdf Forests of Alabama, 2016 – USDA Resource Update FS-RU-252 https://www.srs.fs.usda.gov/pubs/ru/ru_srs252.pdf |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

| | Indicator |
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| 2.3.2 | Adequate training is provided for all personnel, including employees and contractors (CPET S6d). |
| Finding | The BP's policy requires all professional wood producers delivering wood to complete SFI Implementation Committee approved logger training to achieve SFI Logger Education "trained" status. BP procedures provide guidance on who should be trained and how to check training records. BP's fiber procurement staff is also Master Logger trained. |
| Means of Verification | <ul style="list-style-type: none"> Master Logger Training records Company training records |
| Evidence Reviewed | <ul style="list-style-type: none"> Alabama Professional Logging Manager https://www.alaforestry.org/page/PLMGeneral Florida Master Logger http://floridaforest.org/programs/master-logger/master-logger-search-tool/ Georgia Master Timber Harvester http://gamth.org/ VWP-POL-001 Sustainable Forestry Policy VWP-PROC-001 SFI Fiber Sourcing Procedures VWP-DOC-006 Training Records |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

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| 2.3.3 | Analysis shows that feedstock harvesting and biomass production positively contribute to the local economy, including employment. |
| Finding | In addition to the 32 jobs associated with the pellet mill, BP has created another market for wood residuals. This additional market only adds to a forest products industry that is a leading industry and employer in GA, FL and AL. According to recent economic studies, forestry is a \$20.8 billion industry in GA (2016), a \$25.05 billion industry in FL (2016) and a \$18.4 billion industry in AL (2016). Forestry and its related jobs accounted for over 51,900 direct jobs and supported a total of 144,537 employees in GA. In FL forestry impacted 36,055 direct and part-time jobs in 2016. In AL forestry accounted for 54,543 direct manufacturing jobs. |
| Means of Verification | <ul style="list-style-type: none"> Economic studies Employee interviews |
| Evidence Reviewed | <ul style="list-style-type: none"> Economic Contributions of Alabama Agriculture and Forestry http://www.decision-innovation.com/webres/File/docs/AL-AECS/170619_FINAL%20Alabama%20Ag%20%26%20Forestry%20Economic%20Contribution%20Study.pdf Economic Contributions of the Forest Industry and Forest-based Recreation in Florida in 2016 https://fred.ifas.ufl.edu/media/fredifasufledu/economic-impact-analysis/reports/FINAL-REPORT-2016-Florida-Forestry-Contributions-12-19-17.pdf Economic Benefits of the Forest Industry in Georgia: 2017 http://www.gfc.state.ga.us/utilization/economic-impacts/2017%20Forestry%20Impact%20Report%20Web.pdf |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

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| 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>The BP's PEFC Due Diligence and SBP Supply Base Risk Assessments assessed the health, vitality and other services provided by the forest ecosystems within the supply area. These risk assessments using FSC's National Risk Assessment for the Conterminous United States of America (FSC-NRA-USA V1-0) and other reputable conservation initiatives identified and mapped the presence or absence of the following high conservation value areas (HCVs) within the company's supply base.</p> <p>The following HCVs have been identified and mapped within the company's supply area and are assessed below. HCVs identified and assessed as "specified risk" will include describe measures to mitigate risks to a "low risk" level.</p> <p>The National Risk Assessment for the Conterminous United States of America (FSC-NRA-USA V1-0) has identified the following HCVs that are located within VWP's supply area.</p> <ul style="list-style-type: none"> HCV1: Species Diversity <ul style="list-style-type: none"> Central Florida CBA Florida Panhandle CBA HCV3: Rare Ecosystems |

- Late Successional Bottomland Hardwoods
- Native Longleaf Pine Systems

Within the BP's supply area there are other HCVs associated from the high conservation value assessment frameworks identified below.

- Alliance for Zero Extinction (AZE) – There are three (3) AZE sites identified with the BP's supply area.
 4. Auchilla Wildlife Management Area – This AZE site is triggered by Big Blue Spring crayfish (*Procambarus horsti*). This species is on the IUCN Red List and is classified as endangered. The entire known population is confined to this site. The Aucilla Wildlife Management Area covers 50,471 acres in the area between and around the Aucilla and Wacissa rivers. The Aucilla River originates from artesian springs in southern Georgia and becomes a blackwater stream as it twists its way through Florida to the Gulf of Mexico. Aucilla WMA is a mature hardwood forest and is one of the earliest sites of human habitation in North America.
 5. Ocala National Forest – This AZE site triggered by the Silver Glen Springs crayfish (*Procambarus attiguus*) and the big-cheeked cave crayfish (*Procambarus delicatus*). Entire known population of both species confined to this site. The Ocala National Forest is the second largest nationally protected forest in the state of Florida. It covers 607 square miles (1,570 km²) of Central Florida. The Ocala National Forest, established in 1908, is the oldest national forest east of the Mississippi River and the southernmost national forest in the continental U.S.
 6. Torreya State Park – This state park is located within the wood basin in Liberty County, Florida. The park protects the bulk of extant occurrences within the natural range of the Florida Torreya, *Torreya taxifolia*. Two additional protected areas near the park protect additional Torreya occurrences. The Florida Torreya, the target species within this AZE site, is a tree that is 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 Florida torreya originally comprised about 4% of the forest in this area. Its wood was used primarily for fence posts. A fungal blight destroyed the population. Associate tree species included 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.
- IUCN Centre for Plant Diversity (CPD) – There are two HCV sites identified within the BP's defined supply area.
 3. NA25 - Eastern serpentine flora is restricted to soils derived from serpentine rock outcrops found in association with ultramafic rock. NA25 is restricted to the Piedmont physiographic province and is found in Columbia County, GA within the VWP supply area. Serpentine soils, associated with ultramafic bedrock, formed along a linear boundary between ancient continents. There are two of these zones in North America, one on the west coast and another on the east coast. The eastern zone extends from Alabama north into Quebec. Serpentine soils have relatively higher levels of heavy metals (cadmium and nickel) and lower levels of calcium than other soils. Therefore, are toxic to most plants. Clays in serpentine soils have a high affinity for water, more so than other clays, making less water available to plants. Plants found in this CPD are specialists. They are adapted to the harsh conditions created by these soils and cannot survive outside of this habitat, making them obligate endemics to serpentine soils. As already stated, most plants cannot live in this environment.
 4. NA29 - The Central Highlands of Florida overlaps the southern-most portion of the VWP wood basin. The Lake Wales Region within NA29 is an elevated region of Florida that was dry during the most recent interglacial period of the Ice Age. This CPD contains 41 species of endemic vascular plant species found in scrub habitat with an overstory of sand pine. The ecological value of the area is its high level of plant endemism. The greatest threats to this CPD comes from conversion of

native habitat for citrus production, recreation, as well as commercial and residential development.

- Critical Ecosystem Partnership Fund – North American Coastal Plain was added to the Biodiversity Hotspot list in 2016. The North American Coastal Plain reaches from a small section of northern Mexico along the Gulf of Mexico and up the East Coast to southeastern Massachusetts. Despite the 1,816 endemic plant species and the 1.13 million square kilometers of area, the hotspot has a low level of geographic variety and an unusually low level of elevation change when compared to the other hotspots, leading the scientific community to assume it would be less biodiverse. This vast designation includes all the other HCVs described within this risk assessment at a more site specific scale.
- GreenPeace Intact Forest - A Greenpeace Intact Forest is located in Charlton and Ware Counties, GA which is within the VWP defined supply area. 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. There are 353,000 acres designated as a National Wilderness Area within the refuge. Two small fingers of the Greenpeace Intact Forest extend into the Dixon Memorial Wildlife Management Area which is a state-owned forest and beyond the northern end of the refuge. The remainder of the intact forest is within the Okefenokee National Wildlife Refuge where it receives federal protection from the Department of the Interior.
- World Wildlife Fund (WWF), Global 200 Ecoregion - Southeastern Coniferous & Broadleaf Forests (# 75 in the WWF Global 200)

The WWF'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.

Almost all of the counties located in the BP’s defined supply area are in the Southeastern Coniferous & Broadleaf Forests which has a conservation status of endangered/critical. It is significant at a global scale, but this *global* ecoregion (#75) is subdivided into two smaller endangered/critical terrestrial ecoregions. These scaled-down subdivisions have significance at the national level.

1. The Southeastern mixed forests (NA0413) - located in a few counties in the northern end of the VWP wood basin. This is a highly degraded ecoregion with more than 99% of the original habitat having been converted to other uses. Settlers within the ecoregion logged and then cleared the land for agriculture. The ecoregion overlaps and is synonymous with the Piedmont physiographic province along 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. There are multiple examples of protected areas within this ecoregion.
2. The Southeastern conifer forests (NA0529) - the second terrestrial ecoregion that takes up the global ecoregion # 75. The majority of the VWP wood basin overlaps this ecoregion. The ecoregion 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 a longleaf pine overstory and an exceptionally diverse array of plants in the understory and especially in the herbaceous layer. The entire ecology of this region was driven by fire which maintained a longleaf pine dominance in the overstory. 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 eventually 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,

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| | <p>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> |
| Means of Verification | <ul style="list-style-type: none"> • Risk assessments • Supplier Agreements and Logging Contracts • Company policy and procedures • BMP Compliance checklists • Supplier checklists |
| Evidence Reviewed | <ul style="list-style-type: none"> • WWP-DOC-008 PEFC Due Diligence Risk Assessment • WWP-DOC-008a SBP Supply Base Risk assessment • WWP-POL-002 Sustainable Forestry Policy • WWP-PROC-001 SFI Fiber Sourcing Procedures • WWP-DOC-004 Landowner Survey BMP Compliance • WWP-DOC-016 Secondary Supplier Audit Checklist • Supplier Agreements and Logging Contracts |
| Risk Rating | <input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | <p><u>Central Florida CBA</u></p> <ol style="list-style-type: none"> 1. The BP has contracted with Greener Options, Inc. to assist in the development and implementation of BP's certification programs. Greener Options, Inc. working with Biological Integrity, LLC attended the three FSC US Controlled Wood Regional meeting held in 2018. Mark Hughes, PhD, owner of Biological Integrity, LLC attended the Southeast Region meeting on July 31, 2018 in Atlanta, GA. Hughes actively participated in the discussion of mitigating measures for the HCVs during this meeting. Gary Boyd, owner of Greener Options, Inc. has reviewed the FSC US Controlled Wood Regional Meeting final report findings with the BP specifically on recommended mitigation measures for the Central FL CBA. 2. The BP will work with suppliers who source wood fiber from this area to educate their suppliers, their loggers and landowners on the social benefits and values of pine flatwoods, threats from incompatible forest management activities, and opportunities for conservation through management that enhances biodiversity and reduces or eliminates these threats. This education and outreach measure will be documented using Secondary Supplier Audit Checklists. <p><u>Florida Panhandle CBA</u></p> <ol style="list-style-type: none"> 1. The BP has contracted with Greener Options, Inc. to assist in the development and implementation of BP's certification programs. Greener Options, Inc. working with Biological Integrity, LLC attended the three FSC US Controlled Wood Regional meeting held in 2018. Mark Hughes, PhD, owner of Biological Integrity, LLC attended the Southeast Region meeting on July 31, 2018 in Atlanta, GA. Hughes actively participated in the discussion of mitigating measures for the HCVs during this meeting. Gary Boyd, Greener Options, Inc., has reviewed the FSC US Controlled Wood Regional Meeting final report findings with the BP specifically on recommended mitigation measures for the FL Panhandle CBA. 2. The BP 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 and Native Longleaf Pine Systems, 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 Secondary Supplier Audit Checklists.

Late Successional Bottomland Hardwoods (LSBH)

1. The BP only purchases southern pine (*Pinus taeda*, *Pinus elliotii*, *Pinus palustris*, *Pinus serotina*, *Pinus echinata*) for its sawmill and wood pellet facility. These species are not commercially found in this HCV.
2. The BP has contracted with Greener Options, Inc. to assist in the development and implementation of BP's certification programs. Greener Options, Inc. working with Biological Integrity, LLC attended the three FSC US Controlled Wood Regional meeting held in 2018. Mark Hughes, PhD, owner of Biological Integrity, LLC attended the Southeast Region meeting on July 31, 2018 in Atlanta, GA. Hughes actively participated in the discussion of mitigating measures for the HCVs during this meeting.

Gary Boyd, Greener Options, Inc. has reviewed the FSC US Controlled Wood Regional Meeting final report findings with the BP specifically on recommended mitigation measures for LSBH.

3. The BP 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 Secondary Supplier Audit Checklists.

Native Longleaf Pine Systems (NLPS)

1. The BP has contracted with Greener Options, Inc. to assist in the development and implementation of BP's certification programs. Greener Options, Inc. working with Biological Integrity, LLC attended the three FSC US Controlled Wood Regional meeting held in 2018. Mark Hughes, PhD, owner of Biological Integrity, LLC attended the Southeast Region meeting on July 31, 2018 in Atlanta, GA. Hughes actively participated in the discussion of mitigating measures for the HCVs during this meeting.

Gary Boyd, Greener Options, Inc. has reviewed the FSC US Controlled Wood Regional Meeting final report findings with the BP specifically on recommended mitigation measures for the NLPS.

2. The BP 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 fire to NLPS. This education and outreach measure will be documented using Secondary Supplier Audit Checklists.
3. The BP actively partners with the Longleaf Alliance through its membership in the Georgia Forestry Association and the Georgia SFI State Implementation Committee. Financial and in-kind support is documented for the education and awareness of private forest landowners implementing sustainable forestry practices.

Alliance for Zero Extinction (AZE)

1. Auchilla Wildlife Management Area
 - a) The BP only purchases southern pine (*Pinus taeda*, *Pinus elliotii*, *Pinus palustris*, *Pinus serotina*, *Pinus echinata*) for its sawmill and wood pellet facility. These species are not commercially found in this HCV as stated above.
 - b) There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.
2. Ocala National Forest
 - a) There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.
 - b) If wood is harvested from the National Forest, the USDA Forest Service conducts environment impact studies, stakeholder consultations and oversees all timber harvesting on these forests within the HCV providing complete protection of the HCV.

3. Torreya State Park
 - a) The BP only purchases southern pine (*Pinus taeda*, *Pinus elliottii*, *Pinus palustris*, *Pinus serotina*, *Pinus echinata*) for its sawmill and wood pellet facility. These species are not commercially found in this HCV as stated above.
 - b) There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.

IUCN Centre for Plant Diversity (CPD)

1. NA25 - Eastern serpentine flora
 - a) The BP only purchases southern pine (*Pinus taeda*, *Pinus elliottii*, *Pinus palustris*, *Pinus serotina*, *Pinus echinata*) for its sawmill and wood pellet facility. These species are not commercially found in this HCV as stated above.
 - b) There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.
2. NA29 - The Central Highlands of Florida
 - a) The BP only purchases southern pine (*Pinus taeda*, *Pinus elliottii*, *Pinus palustris*, *Pinus serotina*, *Pinus echinata*) for its sawmill and wood pellet facility. Sand pine (*Pinus clausa*), which is the predominant overstory species for the is HCV, is not purchased or used.
 - b) There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.

Critical Ecosystem Partnership Fund

1. This vast designation includes all the other HCVs described within this risk assessment at a more site specific scale.
2. There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.

GreenPeace Intact Forest

1. There is a strong system of protection (effective protected areas and legislation) in place within the BP's defined supply area that ensures survival of this HCV.
2. No wood is harvested out of the described National Wilderness Area which is managed by the Department of Interior. If wood is harvested from the surrounding forests described above, The Department of Interior and the Georgia Forestry Commission conducts environment impact studies and oversees all timber harvesting on these forests within the HCV providing complete protection of the HCV.

WWF Global 200 Ecoregion - Southeastern Coniferous & Broadleaf Forests

1. The Southeastern mixed forests (NA0413)
 - a) WWF has declared more than 99% of this ecoregion having been converted. The remaining examples of this HCV are known to occur on protected lands.
2. The Southeastern conifer forests (NA0529)
 - a) As stated above, WWF has declared most of this HCV has been reduced to less than 1% of its original size. The remaining examples of this HCV are known to occur on protected lands.
 - b) While the BP does use some longleaf pine (*Pinus palustris*), the company tracks the use of this species through the monitoring of its direct purchases of wood from the forest and through its secondary suppliers that are audited on an annual basis. Most longleaf pine purchased can be documented not coming from HCV areas as described by FSC HCV framework organizations.
 - c) The BP actively partners with the Longleaf Alliance through its membership in the Georgia Forestry Association and the Georgia SFI State Implementation Committee. Financial and in-kind support is documented for the education and awareness of private forest landowners implementing sustainable forestry practices.

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| 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 VWP 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>VWP works with state forestry agencies, as needed, to address issues of forest health through its membership on the Plantation Management Research Cooperative (PMRC) and participation on the GA SFI State Implementation Committee (SIC).</p> <p>The GA Forestry Commission in its 2018 Annual Report stated there were 2,930 wildfires burning 15,385 acres for the fiscal year. GFC stated wildfire occurrence was below its 5 year average. GFC foresters incorporated insect, disease, or invasive species advice into 732 management cases involving 30,052 acres for the year.</p> <p>The FL Forest Service in its 2017 Annual Report stated there were 2,865 wildfires that burned 200,655 acres.</p> <p>The AL Forestry Commission reported in the 2019 Annual Report that wildland firefighters suppressed 1,924 wildfires that burned 17,545 acres.</p> |
| Means of Verification | State forestry agency reports |
| Evidence Reviewed | <ul style="list-style-type: none"> • VWP-PROC-001 SFI Fiber Sourcing Procedures • SFI Annual Progress Report • PMRC Membership • GA SIC Committee Meeting Minutes • GA Forestry Commission 2018 Annual Report https://gatrees.org/wp-content/uploads/2020/01/GFC-2018-Annual-Report.pdf • FL Forest Service 2017 Annual Report https://www.fdacs.gov/content/download/80670/file/2017_DeptAnnualReport_Web.pdf • AL Forestry Commission 2019 Annual Report https://forestry.alabama.gov/Pages/Other/Forms/Annual_Reports/Annual_Report_2019.pdf |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

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| 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 | The BP referenced FSC's National Risk Assessment for the Conterminous United States of America (FSC-NRA-USA V1-0) as part of its risk assessment. The national assessment has determined Controlled Wood Category 1: Illegally harvested wood to be "low risk". |

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. The state laws addressing illegal logging and wood theft are as follows:

Alabama Laws

ALA. CODE 1975 § 9-13-62 awards double damages for a trespass that is committed *knowingly and intentionally.*"

Article 3 - Regulations as to Cutting, Removal, Purchase, etc., of Forest Products

§ 9-13-60 Unauthorized cutting, removal, transportation, etc., of timber or other forest products

§ 9-13-61 Charges in affidavits, information or indictments under article; proof of title, etc.

§ 9-13-62 Liability

§ 9-13-63 Record of purchases, etc., of manufactured or semi-manufactured forest products; provision of false information to purchasers, etc.; failure to maintain record, etc.

§ 9-13-64 Powers of State Forestry Commission employees as to enforcement of article, etc.

§ 9-13-65 Disposition of fines

Article 9 - Timber Theft Equipment Condemnation

§ 9-13-220 Short title

§ 9-13-221 Seizure of vehicle and equipment upon arrest for certain criminal violations; delivery to district forester

§ 9-13-222 Report of seizure to district attorney

§ 9-13-223 Report to district attorney after conviction of person for theft of timber or lumber

§ 9-13-224 Notice to creditors; institution of condemnation proceedings; legal title to equipment

§ 9-13-225 Forfeiture of equipment upon judgment; costs of proceedings; State Forester to keep records

§ 9-13-226 Use of proceeds from sale of equipment; award and distribution determined by State Forester

§ 9-13-227 Provisions cumulative

Georgia Laws

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:

Florida Laws

Title XXXIII Regulation of Trade, Commerce, Investments, and Solicitations

Chapter 536 Timber and Lumber

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| | <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> <p>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.</p> |
| Means of Verification | <ul style="list-style-type: none"> • State laws • Company policy • WWP-DOC-008a SBP Supply Base Risk Assessment • National Risk Assessment for the Conterminous United States of America (FSC-NRA-USA V1-0) • Supply Agreements and Logging Contracts |
| Evidence Reviewed | <ul style="list-style-type: none"> • WWP-POL-001 Sustainable Forestry Policy • WWP-PROC-002 Chain of Custody Procedures • WWP-DOC-008 PEFC Due Diligence Risk Assessment • WWP-DOC-008a SBP Supply Base Risk Assessment • National Risk Assessment for the Conterminous United States of America (FSC-NRA-USA V1-0) • Supply Agreements and Logging Contracts • State laws |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

| | Indicator |
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| 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 BP's supply area.</p> <p>According to the BP's SBP Supply Base Risk Assessment there is low risk in 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. Below are the justifications for this low risk designation.</p> <ul style="list-style-type: none"> • There are no U.N. Security Council bans on timber exports from the United States; • USAID does not designate districts as source of conflict timber; • There is no evidence of child labor or violation of ILO Fundamental Principles and Rights at work taking place in forest areas in the district concerned; • 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; • There is no evidence of violation of the ILO Convention 169 in the US. <p>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 BP's supply area.</p> |
| Means of Verification | <ul style="list-style-type: none"> • WWP-DOC-008a SBP Supply Base Risk Assessment |
| Evidence Reviewed | <ul style="list-style-type: none"> • WWP-DOC-008a SBP Supply Base Risk Assessment • Bureau of Indian Affairs https://www.bia.gov/ |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

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| 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 | <p>The BP has a policy and procedures in place to provide support and guidance on how employees and suppliers meet Best Management Practices (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. Supplier Agreements and Logging Contracts have clauses requiring adherence to state BMPs. Procedures are in place to monitor BMP compliance on tracts delivering fiber directly from the forest.</p> |

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| | The BP reaches 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 | <ul style="list-style-type: none"> • Company policy and procedures • Supplier Agreements and Logging Contracts • BMP Compliance Checklists • Stakeholder consultation feedback and follow-up |
| Evidence Reviewed | <ul style="list-style-type: none"> • VWP-POL-001 Sustainable Forestry Policy • VWP-PROC-001 SFI Fiber Sourcing Procedures • Supplier Agreements and Logging Contracts • VWP-DOC-004 Landowner Survey BMP Compliance • VWP-DOC-014 SBP Stakeholder List • VWP-DOC-015 Stakeholder Letter Template |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

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| 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 | <p>The BP has complaint mechanisms in place as part of its chain of custody and due diligence procedures. Both procedures provide guidance on when and how the BP responds to grievances and complaints. No complaints or grievances have been received to date.</p> <p>The United States has a robust legal system with established laws & regulations protecting tenure and use rights, forest management practices and work conditions. One such federal administration, OSHA, ensures workers have a safe work environment. OSHA has a complaint process where workers can submit complaints to have their workplace inspected.</p> <p>Globally, the United States is recognized as having high quality governance and regulatory quality. In 2018, the United States ranked 89.42 for Rule of Law and 92.31 for Regulatory Quality in the Worldwide Governance Indicators by the World Bank.</p> <p>The BP has implemented the National Risk Assessment for the Conterminous United States of America (FSC-NRA-USA V1-0) which has determined Controlled Wood Category 1: Illegally harvested wood & Category 2: Wood harvested in violation of traditional and human rights to be “low risk”. VWP-DOC-008a SBP Supply Area Risk Assessment supports these low risk assessments through the listing of various applicable laws showcasing the rule of law and public agency governance.</p> |
| Means of Verification | <ul style="list-style-type: none"> • Company procedures • State & Federal laws and regulations • Employee interviews |
| Evidence Reviewed | <ul style="list-style-type: none"> • VWP-PROC-002 Chain of Custody Procedures • VWP-PROC-003 SBP Procedures • VWP-DOC-008a SBP Supply Area Risk Assessment • VWP-DOC-011 Due Diligence Concern Report • VWP-DOC-011 Due Diligence Concern Log • National Risk Assessment for the Conterminous United States of America (FSC-NRA-USA V1-0) • Occupational Safety and Health Administration (OSHA) |

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| | https://www.osha.gov/ |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
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| 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 | The BP recognizes the right to collective bargaining and the Freedom of Association. The BP is PEFC Chain of Custody certified which requires the company to comply with social laws. The BP has a publicly available sustainable forestry policy that affirms its commitment to comply with labor, health & safety, and other social laws. Federal laws in the United States codified in both the National Labor Relations Act of 1935 and OSHA protect workers' rights to collective bargaining. AL, GA and FL are Right to Work states. Further, compliance with social laws is enforced through contractual representations by suppliers. |
| Means of Verification | <ul style="list-style-type: none"> • Employee interviews • VWP-POL-001 Sustainable Forestry Policy • VWP-PROC-002 Chain of Custody Procedures • Federal Laws summarized in VWP-DOC-008a SBP Supply Base Risk Assessment • Supplier Agreements and Logging Contracts |
| Evidence Reviewed | <ul style="list-style-type: none"> • VWP-POL-001 Sustainable Forestry Policy • VWP-PROC-002 Chain of Custody Procedures • VWP-PROC-003 SBP Procedures • Supplier Agreements and Logging Contracts • National Labor Relations Act: http://www.nlr.gov/resources/national-labor-relations-act • 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 |
| Comment or Mitigation Measure | |

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| 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 | The United States Federal Constitution 13 th 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”. Benefiting from compulsory labor in the United States is a federal crime punishable by up to 20 years in prison. |

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| | The BP is PEFC Chain of Custody certified which requires the company to comply with social laws. The BP has a publicly available sustainable forestry policy that affirms its commitment to comply with labor, health & safety, and other social laws. Further, compliance with labor laws is enforced through contractual representations by suppliers. |
| Means of Verification | <ul style="list-style-type: none"> • Company employment policies • Employee interviews • VWP-POL-001 Sustainable Forestry Policy • VWP-PROC-002 Chain of Custody Procedures • Federal Laws summarized in VWP-DOC-008a SBP Supply Base Risk Assessment • Supplier Agreements and Logging Contracts |
| Evidence Reviewed | <ul style="list-style-type: none"> • VWP-POL-001 Sustainable Forestry Policy • VWP-PROC-002 Chain of Custody Procedures • VWP-PROC-003 SBP Procedures • Supply Agreements and Logging Contracts • Employment Posters • Amendment XIII of the United States Constitution: https://www.law.cornell.edu/constitution/amendmentxiii • 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 |
| Comment or Mitigation Measure | |

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| 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 labour. The BP is PEFC Chain of Custody certified which requires the company to comply with labour laws against child labour. The BP has a publicly available sustainable forestry policy that affirms its commitment to comply with labor, health & safety, and other social laws. Further, compliance with labour laws is enforced through contractual representations by suppliers. |
| Means of Verification | <ul style="list-style-type: none"> • Review of Company employment policies • Employee interviews • VWP-POL-001 Sustainable Forestry Policy • VWP-PROC-002 Chain of Custody Procedures • Federal Laws summarized in VWP-DOC-008a SBP Supply Base Risk Assessment • Supplier Agreements and Logging Contracts |
| Evidence Reviewed | <ul style="list-style-type: none"> • VWP-POL-001 Sustainable Forestry Policy • VWP-PROC-002 Chain of Custody Procedures • VWP-PROC-003 SBP Procedures • Supplier Agreements and Logging Contracts • Employment Posters • US Federal Child Labor Laws: http://www.dol.gov/whd/childlabor.htm • GA Child Labor Law: http://www.dol.state.ga.us/em/child_labor.htm • FL Child Labor Law: http://www.myfloridalicense.com/dbpr/reg/childlabor/ • AL ChildLabor Law: http://www.labor.alabama.gov/uc/ChildLabor/ |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |

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| 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 BP is PEFC Chain of Custody certified which requires the company to comply with labour laws including discrimination. The BP has a publicly available sustainable forestry policy that affirms its commitment to comply with labor, health & safety, and other social laws. Further, compliance with labour laws is enforced through contractual representations by suppliers. |
| Means of Verification | <ul style="list-style-type: none"> Employee interviews Federal laws summarized in VWP-DOC-008a SBP Supply Base Risk Assessment VWP-POL-001 Sustainable Forestry Policy VWP-PROC-002 Chain of Custody Procedures Supplier Agreements and Logging Contracts |
| Evidence Reviewed | <ul style="list-style-type: none"> VWP-POL-001 Sustainable Forestry Policy VWP-PROC-002 Chain of Custody Procedures VWP-PROC-003 SBP Procedures Supplier Agreements and Logging Contracts Employment Posters US Code 1311: https://www.law.cornell.edu/uscode/text/2/1311 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 |
| Comment or Mitigation Measure | |

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| 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 BP is PEFC Chain of Custody certified which requires the company to comply with labour laws. The BP has a publicly available sustainable forestry policy that affirms its commitment to comply with labour, health & safety, and other social laws. Further, compliance with labour laws is enforced through contractual representations by suppliers. |
| Means of Verification | <ul style="list-style-type: none"> Employee interviews Federal laws summarized in VWP-DOC-008a SBP Supply Base Risk Assessment Sustainable Forestry Policy PEFC Chain of Custody Procedures Supplier Agreements and Logging Contracts |
| Evidence Reviewed | <ul style="list-style-type: none"> VWP-POL-001 Sustainable Forestry Policy VWP-PROC-002 Chain of Custody Procedures |

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| | <ul style="list-style-type: none"> • VWP-PROC-003 SBP Procedures • VWP-DOC-008a SBP Supply Base Risk Assessment • Supplier Agreements and Logging Contracts • Employment Posters |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
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| 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 | <p>State and Federal laws, such as OSHA to ensure worker health and safety in the work place.</p> <p>The BP has policies on workers' health and safety. The BP has a health and safety program that is managed by dedicated personnel. This program includes the use of personal protective equipment and safety meetings.</p> <p>The BP's Supplier agreements and logging contracts contain requirements of adhering to laws and regulations including worker health and safety. The BP requires their suppliers, sub-suppliers and loggers to maintain SFI State Implementation Committee (SIC) logger training. This training educates loggers on safety. The BP has access to SIC logger training databases to verify logger training.</p> <p>The United States has a robust legal system with established laws & regulations protecting tenure & use rights, forest management practices & work conditions. One such federal administration, OSHA, ensures workers have a safe work environment. OSHA has a complaint process where workers can submit complaints to have their workplace inspected.</p> <p>Globally, the United States is recognized as having high quality governance and regulatory quality. In 2018, the United States ranked 89.42 for Rule of Law and 92.31 for Regulatory Quality in the Worldwide Governance Indicators by the World Bank. The BP has implemented the National Risk Assessment for the Conterminous United States of America (FSC-NRA-USA V1-0) which has determined Controlled Wood Category 1: Illegally harvested wood & Category 2: Wood harvested in violation of traditional and human rights to be "low risk". The BP's SBP Supply Base Risk Assessment supports these low risk assessments through the listing of various applicable laws showcasing the rule of law and public agency governance.</p> |
| Means of Verification | <ul style="list-style-type: none"> • Training records • Laws & regulations summarized in VWP-DOC-008a SBP Supply Base Risk Assessment • Supplier Agreements and Logging Contracts • Logger training through the State SIC Logger Training databases • Employee interviews |
| Evidence Reviewed | <ul style="list-style-type: none"> • Company Safety Manual • Safety Training records • Safety Inspections • Supplier Agreements and Logging Contracts • State SIC Logger Training databases • National Risk Assessment for the Conterminous United States of America (FSC-NRA-USA V1-0) |

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| | <ul style="list-style-type: none"> VWP-DOC-008a SBP Supply Base Risk Assessment Occupational Safety and Health Administration (OSHA) https://www.osha.gov/ |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

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| 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 231.035 million short tons for the most recent years in AL (2019), FL (2016) & GA (2018). This accounts for a 10.31% increase in the 7-11 years. |
| Means of Verification | USDA Forest Service FIA data |
| Evidence Reviewed | Carbon Reports from Forest Data Inventory Online from the USDA Forest Service website |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

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| 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 231.035 million short tons for the most recent years in AL (2019), FL (2016) & GA (2018). This accounts for a 10.31% increase in the 7-11 years. |
| Means of Verification | USDA Forest Service FIA data |
| Evidence Reviewed | Carbon Reports from Forest Data Inventory Online from the USDA Forest Service website |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |

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| 2.10.1 | Genetically modified trees are not used. |
| Finding | <p>The BP referenced FSC's NATIONAL RISK ASSESSMENT FOR THE CONTERMINOUS UNITED STATES OF AMERICA (FSC-NRA-USA V1-0) as part of its risk assessment. The national assessment has determined Controlled Wood Category 5: Wood from forests in which genetically modified trees are planted to be "low risk".</p> <p>The BP completed a SBP Supply Base Risk Assessment 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.</p> |
| Means of Verification | Review of citations within Risk Assessment |
| Evidence Reviewed | <ul style="list-style-type: none"> • VWP-DOC-008a SBP Supply Base Risk Assessment • National Risk Assessment for the Conterminous United States of America (FSC-NRA-USA V1-0) |
| Risk Rating | <input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA |
| Comment or Mitigation Measure | |