



SCS Global Services Evaluation of Ideal Pellets, LLC Compliance with the SBP Framework: Public Summary Report

Main (Initial) Audit

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Completed in accordance with the CB Public Summary Report Template Version 1.5

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

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1 Overview

Certification Body (CB) Name:	SCS Global Services
Primary CB contact for SBP:	Maggie Shwartz
Primary CB contact email:	mschwartz@scsglobalservices.com
Audit team leader:	Kyle Meister
Audit team members:	Shannon Wilks
Name of the Company:	Ideal Pellets, LLC
Company legal address:	19 Farmer St, PO Box 1810, 31539 Hazlehurst, GA, United States
Company contact for SBP:	Elizabeth van Tilborg
Company contact email:	vantilborg@framfuels.com
Company website:	N/A
SBP Certificate Code:	SBP-04-61
Date of certificate issue:	26 Jul 2021
Date of certificate expiry:	25 Jul 2026
Audit closing meeting date:	25 Jun 2021
Audit cycle:	Main (Initial) Audit

2 Scope of the evaluation and SBP certificate

Scope Item	Check all that apply to the Certificate Scope	Change in scope (N/A for Assessments)
Primary Activity:	Biomass Producer	<input type="checkbox"/>
Approved Standards:	SBP Standard 1: Feedstock Compliance Standard; SBP Standard 2: Verification of SBP-compliant Feedstock; SBP Standard 4: Chain of Custody; SBP Standard 5: Collection and Communication of Data Instruction; Instruction Document 5E: Collection and Communication of Energy and Carbon Data 1.4	<input type="checkbox"/>
Includes Supply Base Evaluation (SBE):	Yes	<input type="checkbox"/>
Includes communication of Dynamic Batch Sustainability Data (DBSD)	Yes	<input type="checkbox"/>
Includes Group Scheme	No	<input type="checkbox"/>
Products	Pellets	<input type="checkbox"/>

Feedstock types:	Tertiary	<input type="checkbox"/>
Feedstock origin (countries):	United States	<input type="checkbox"/>
SBP-endorsed Regional Risk Assessments used:	Not applicable	<input type="checkbox"/>
Public link: https://sbp-cert.org/documents/standards-documents/risk-assessments/		<input type="checkbox"/>
Chain of custody system implemented:	PEFC, FSC: FSC - SCS-COC-006058 PEFC - SCS-PEFC/COC-006058	<input type="checkbox"/>
	Credit	<input type="checkbox"/>

2.1 Description of the company

Fram Renewable Fuels, LLC operates five wood pellet mills in Southeast Georgia, USA, each with their own SBP certificate: Appling County Pellets, LLC (Baxley GA), Hazlehurst Wood Pellets, LLC (Hazlehurst, GA), Telfair Forest Products, LLC (Lumber City, GA), Archer Forest Products, LLC (Nahunta, GA), and Ideal Pellets, LLC (Oglethorpe, GA). Most mills receive a combination of secondary mill residuals (e.g., green sawdust, chips) and pre-consumer tertiary residuals (e.g., dry sawdust and dry chips from milling of secondary products) from local forest product mills (e.g., sawmills, engineered forest product mills, pulp, etc.). Hazlehurst Wood Pellets (HWP) also receives primary material in the form of roundwood. Archer Forest Products receives primary material as roundwood or in-woods chips. Ideal Pellets, LLC receives only pre-consumer tertiary feedstock. Since the company has completed a Supply Base Evaluation, all output pellets are sold as SBP-compliant. The supply base includes US states Alabama, Georgia, South Carolina, North Carolina, Tennessee and the northern part of Florida. A map and list of counties of the supply base is provided in the supply base report. The feedstock type that is sourced by Ideal Pellets is tertiary feedstock. For a more detailed description of the supply base, the reader is referred to the supply base report associated with this audit project.

2.2 Detailed description of the Chain of Custody system

As applicable, all material is subject to the organization's COC procedures for sourcing certified and non-certified material. The organization sources material from certified sources under its valid COC certificate(s) per the following systems: FSC PEFC and/or SFI. As applicable, any non-certified sources have been evaluated under the BP's COC Due Diligence System (DDS) or Controlled Wood procedures, as well an SBE and/or duly approved Regional Risk Assessment.

3 Specific objective

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

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

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

CCP	Description, including how evaluated by SCS
	<p>Review of processes used to identify and assess risk of feedstock suppliers, including use of district of origin assessments and internal audits of suppliers. Prior to delivery, each supplier must be set up in the system after declaring the types of feedstock it may supply and providing information on district of origin. Suppliers include information on tract of origin (if applicable), logging company, and/or trucking company (if different than logging company);</p> <p>Verification of transportation methods used to deliver feedstock, including observation of trucks and review of delivery tickets;</p>
Processes for procurement and processing, transport and storage	<p>Receipt and identification of incoming feedstock at the scale house and delivery of feedstock to storage areas:</p> <ul style="list-style-type: none">· Review of delivery tickets, scale data, and volume summaries, including information on origin of each feedstock group;· Interviews with scale house staff on classification of feedstock (e.g., primary, secondary, and tertiary), as applicable;· Observation of storage areas for feedstock group(s).
Volume accounting method	<p>Observation of facilities onsite for feedstock entry points into production.</p> <p>BP adheres to PEFC and FSC rules for the volume credit and credit systems, respectively. Reviewed</p>

volume summaries and credit accounts. All feedstock qualifies as controlled material and is classified as low risk per the SBE.

Documentation of transactions

BP uses a database system to record each delivery of feedstock. All feedstock is delivered using the supplier's ticket, which demonstrates the origin of the material. After scaling, a receipt is created for the truck driver and BP. The scaling data is automatically entered into the database.

Energy data collection and reporting

BP has procedures for data collection. Data are typically entered into database systems and extracted to Excel files or directly entered into Excel files. Calculations are made in Excel files, which include instructions to ensure replicability and citations of methods used when necessary.

4 Evaluation process

4.1 Timing of evaluation activities

<i>Audit Level of Effort (LoE)</i>		
Activity	Auditors	Auditor hours
1. Preparation	Kyle Meister, Shannon Wilks	8,0
2. On-site (excl. travel time)	Kyle Meister, Shannon Wilks	22,0
3. Report writing	Kyle Meister, Shannon Wilks	8,0
4. Other	N/A	N/A

Audit Schedule			
Activity	Location	Auditor name	Date/time
<i>Refer to table below.</i>	<i>Refer to table below.</i>	<i>Refer to table below.</i>	25 Jun 2021/Below

Auditor qualification		
Auditor name	Role	Qualification
Kyle Meister	Lead auditor	Lead SBP auditor, lead FSC, SFI, and PEFC FM & COC auditor

Shannon Wilks	Technical expert	Lead SBP auditor, lead FSC, SFI, and PEFC FM & COC auditor
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4.2 Description of evaluation activities

Site Name or Location:	Ideal Pellets, LLC	
	17 May 2021: opening meeting (9:30 am EST)	
Date and Time of Audit:	19 May 2021: initial closing meeting (9:30 am EST)	
Audit Activity	Items to Review / Actions	Approx. Time
Opening meeting (MS Teams)	Introductions, auditor review of audit scope, audit plan and intro/update to SBP, FSC, and SCS standards and protocols, client description of organization	60 min
Review of previous nonconformities	Review of evidence of corrective actions taken by organization since previous audit (records, documents, pictures, etc.)	120 min
Review of CoC/SBP procedures, products and material accounting	Written procedures, work instructions, feedstock description (see ID 5B section 4), product group list, accounting system (transfer, percentage or credit; physical separation, percentage method)	60 min
Review of material balances and records	Auditor-selected sample of the following: material tracking system, summary of purchases and sales, invoices, shipping documents, training records, outsourcing agreements, other applicable SBP/CoC systems, procedures and records, tracebacks from certified outputs to eligible inputs	120 min
Verification of calculations	Auditor-selected sample and	120 min

Evaluation of trademarks	verification of calculations for conversion factors, percentage claims, and credit accounts, as applicable Review of auditor-selected sample of SBP/FSC/PEFC and/or SCS on-product and/or promotional trademark uses; review of any on-site trademark uses such as banners, posters, entryway signs	30 min
SBP ST 5	Review of GHG data collection	5.0 hrs.
Remote inspection of facility	Review of physical inputs and outputs, material receipt, processing, storage, credit account (if applicable), sale, and overall control	60 min
Secondary/tertiary supplier interviews	Ideal (0) Primary; (0) Secondary; (2) T	30 min
Staff interviews	Interviews with appropriate number and diversity of staff to assess knowledge of CoC procedures related to their position	60 min
Closing meeting preparation	Auditor takes time to consolidate notes and review audit findings for presentation at closing meeting	60 min
Preliminary closing meeting and review of findings	Convene with all relevant staff to summarize audit findings, review identified nonconformities, and discuss next steps	60 min

Site Name or Location: Onsite inspection of pellet mill

Date and Time of Audit: 25 June 2021

Audit Activity	Items to Review / Actions	Approx. Time
Mill inspection	Critical control points for COC and GHG, interviews with workers to confirm knowledge of procedures and OSH conditions. Closing meeting.	0.5 workdays

4.3 Sampling methodology

Supplier audits: 2 Tertiary suppliers were sampled. Supplier sampling is determined using SBP sampling formulas described or cited in SBP Standard 3. Audit teams ensure to sample across the variety of forest ecosystems and/or feedstocks from which the organization sources, including by selecting different land

ownership/management (e.g., small, public, private, etc.), harvesting types (thinning, final harvest), and feedstock type (primary, secondary, tertiary, hardwood, softwood, etc.).

4.4 CB stakeholder engagement

SCS relies on its Master Stakeholder List, which contains interested parties such as stakeholders and/or rightsholders that are identified by type (e.g. ENGO, Government/regulatory, Educational/Academic, Industry, Indigenous/Aboriginal/Tribal, etc.) This list is categorized by country and state/province/territory at the very least, and for this consultation was filtered to omit any interested parties that were not geographically relevant to the certificate holder/applicant's supply base. A notification is sent out to all identified interested parties after the BP's consultation period has ended. Comments from interested parties that are received outside of regular consultation periods are fully considered. Methods used to communicate with interested parties may include, but are not limited to, public, private or semi-private meetings, email, telephone, written correspondence, and/or messaging application.

Consultation that may have been conducted by the BP during the audit period may be described in the BP's SBR. Sometimes, formal and informal consultation may not be documented in the BP's SBR due to confidentiality concerns of interested parties.

The following consultation activities occurred as a part of this audit:

- Consultation has been conducted by SCS Global Services.
- Consultation has been conducted by SCS Global Services, but interested parties did not respond to any communications and/or did not provide permission to include comments in the report.
- No consultation has been conducted by SCS Global Services.

4.5 Stakeholder feedback

No stakeholder comments were received before, during or after the evaluation.

5 Results

5.1 Main strengths and weaknesses

Strengths

The BP maintains a well-managed system for gathering, compiling, and reporting Greenhouse Gas data. No traceability issues were found in the Chain of Custody system. Most feedstock inputs are from sawmill residuals that would otherwise be burned as low-grade fuel or even landfilled. The pellets are a value-added product that leads to the creation of direct employment opportunities for transport, manufacturing, and service-sector jobs.

Weaknesses

Refer to non-conformities.

5.2 Rigour of Supply Base Evaluation

Is the current definition of scope adequate for the specific characteristics of the Supply Base and management systems in place?

Yes No

Are the means of verification and evidence provided enough to support the risk conclusion?

Yes No

Are mitigation measures implemented for specified risk sufficient and adequate?

Yes No NA, no mitigation measures necessary

Are the personnel involved in the development of the Supply Base Evaluation (SBE) knowledgeable in the required fields?

Yes No

Refer to non-conformities for any deficiencies noted in the SBE.

5.3 Collection and communication of data

The collection and communication of data is well organized. The administrator demonstrated good understanding of the relevant information for collection and communication of data and all documents are correctly filled out.

5.4 Competency of involved personnel

The BP's management and control systems for SBP are the same as those used to meet the FSC/PEFC Chain of Custody and FSC Controlled Wood requirements, which have been in place since 2013. Key personnel tasked with implementing the BP's management and control systems relating to SBP compliance

are well trained and competent, with strengths in markets, silviculture, management, harvesting, and conservation issues. Their knowledge of SBP requirements is strong.

Since 2019, Fram has conducted its own in-house supply base evaluation and risk assessment in accordance with the requirements set up in FRF-SBP-DP-12, SBE Competency Procedure. Fram has highly competent Sustainability and Wood Procurement Teams with 30+ years of experience in the forest products industry, logging, certification and forest management/policy.

6 Review of company's risk assessments

6.1 Overview of company's risk assessments and mitigation measures

The BP maintains a single SBE for its regional pellet mills.

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

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

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

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

Mitigation measures are described in the BP's Supply Base Report (SBR). Refer to the SBR, or the section below, which is taken directly from the SBR.

6.2 Specified risk indicators and mitigation measures

Country/Area	Indicator	Specified risk description	Mitigation measure
United States	2.1.1 The BP has implemented appropriate control systems and procedures for verifying that forests and other areas	Although there is an FSC US National Risk Assessment, the US does not have an SBP approved regional risk assessment that fully considers all of the indicators. Specified Risk occurs in the Supply Base based on the FSC US National Risk Assessment (NRA). The NRA has concluded that high	<ul style="list-style-type: none"> Pre-verification of fiber supply by the Procurement Manager to determine if the fiber is eligible to be used as feedstock and meets Fram's sustainability requirements (FSC, PEFC, SBP, EUTR compliant). Each new residual supplier is evaluated prior to purchasing and if the supplier

	<p>with high conservation value in the Supply Base are identified and mapped.</p>	<p>conservation values are threatened by forest management activities in some areas (Category 3).</p>	<p>meets the criteria, then a contract is signed. The potential feedstock is evaluated to make sure it is within Fram’s Supply Base Evaluation and assessed against the risks related to forest management activities that might occur in high conservation value forests.</p> <ul style="list-style-type: none"> • A written contract between the BP and the Supplier which identifies the legal and sustainability requirements, including use of trained loggers and BMP compliance. Loggers who have been trained have the ability to recognize threatened and endangered species and react accordingly. They are also experts in BMPs which protect biodiversity. • Identifying incoming raw materials as either “Certified” or FSC/PEFC Controlled Wood. Maintaining FSC/PEFC certification is ongoing evidence that the risk of accepting feedstock from high conservation value forests is low risk. • Annual supplier correspondence regarding HCVs and other relevant items • Right to audit at the supplier mill or tract level at any time for all types of feedstock. • Monthly BMP compliance inspections on active logging jobs (primary feedstock). • Quarterly District of Origin checks on primary feedstocks. • Internal audits by BP on a subset of secondary/tertiary suppliers related to sourcing area, HCVs, conversion, timber legality, etc. Done annually on a sub-set of suppliers with higher risk of entering unacceptable material into the supply chain.
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			<ul style="list-style-type: none"> • Primary feedstock suppliers encouraged to adopt BMPs for Biomass Harvesting. • Ability to terminate contracts that don't meet sustainability criteria.
United States	2.1.2 The BP 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.	If areas of high conservation value cannot be adequately identified, the management systems or mitigation measures cannot be implemented to reduce risk. Specified Risk occurs in the Supply Base based on the FSC US National Risk Assessment (NRA). The NRA has concluded that high conservation values are threatened by forest management activities in some areas (Category 3).	<ul style="list-style-type: none"> • Pre-verification of fiber supply by the Procurement Manager to determine if the fiber is eligible to be used as feedstock and meets Fram's sustainability requirements (FSC, PEFC, SBP, EUTR compliant). Each new residual supplier is evaluated prior to purchasing and if the supplier meets the criteria, then a contract is signed. The potential feedstock is evaluated to make sure it is within Fram's Supply Base Evaluation and assessed against the risks related to forest management activities that might occur in high conservation value forests. • A written contract between the BP and the Supplier which identifies the legal and sustainability requirements, including use of trained loggers and BMP compliance. Loggers who have been trained have the ability to recognize threatened and endangered species and react accordingly. They are also experts in BMPs which protect biodiversity. • Identifying incoming raw materials as either "Certified" or FSC/PEFC Controlled Wood. Maintaining FSC/PEFC certification is ongoing evidence that the risk of accepting feedstock from high

			<p>conservation value forests is low risk.</p> <ul style="list-style-type: none"> • Annual supplier correspondence regarding HCVs and other relevant items • Right to audit at the supplier mill or tract level at any time for all types of feedstock. • Monthly BMP compliance inspections on active logging jobs (primary feedstock). • Quarterly District of Origin checks on primary feedstocks. • Internal audits by BP on a subset of secondary/tertiary suppliers related to sourcing area, HCVs, conversion, timber legality, etc. Done annually on a sub-set of suppliers with higher risk of entering unacceptable material into the supply chain. • Primary feedstock suppliers encouraged to adopt BMPs for Biomass Harvesting. • Ability to terminate contracts that don't meet sustainability criteria.
United States	2.1.3 The BP has implemented appropriate control systems and procedures for verifying that feedstock is not sourced from forests	Although most conversion occurring in the supply base area is due to urban development, there is a risk of accepting conversion wood without the proper due diligence and mitigation measures in place. Specified Risk occurs in the Supply Base based on the FSC US National Risk Assessment (NRA). The NRA has concluded	<ul style="list-style-type: none"> • Pre-verification of fiber supply by the Procurement Manager to determine if the fiber is eligible to be used as feedstock and meets Fram's sustainability requirements (FSC, PEFC, SBP, EUTR compliant). Each new residual supplier is evaluated prior to purchasing and if the

	<p>converted to production plantation forest or non-forest lands after January 2008.</p>	<p>that high conservation values are threatened by conversion occurring from natural forests being converted to plantation or non-forest use (Category 4).</p>	<p>supplier meets the criteria, then a contract is signed. The potential feedstock is evaluated to make sure it is within Fram's Supply Base Evaluation and assessed against the risks related to forest management activities that might occur in high conservation value forests.</p> <ul style="list-style-type: none"> • A written contract between the BP and all Suppliers which identifies the legal and sustainability requirements, including avoidance of sourcing from natural forests being converted to plantation or non-forest use (Conversion). Primary wood suppliers (roundwood, in-woods chips) and Fram foresters are trained to understand conversion and avoid sending that type of wood to Fram mills. Internal audits area completed quarterly to monitor compliance. • Identifying incoming raw materials as either "Certified" or FSC/PEFC Controlled Wood. Maintaining FSC/PEFC certification is ongoing evidence that the risk of accepting feedstock from conversion is low risk. Fram has FSC/PEFC Chain of Custody Procedure in place which addresses conversion wood. • Annual supplier contact regarding sourcing counties/states • Right to audit at the supplier mill or tract level at any time for all types of feedstock.
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			<ul style="list-style-type: none"> • Monthly BMP compliance inspections on active logging jobs (primary feedstock which includes conversion assessment). • Quarterly District of Origin checks on primary feedstocks, which includes conversion assessment. • Internal audits by BP on a subset of secondary/tertiary suppliers related to sourcing area, HCVs, conversion, timber legality, etc. Done annually on a sub-set of suppliers with higher risk of entering unacceptable material into the supply chain. • Ability to terminate contracts that don't meet sustainability criteria.
United States	2.2.3 The BP 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).	If key ecosystems and habitats are not identified they cannot be conserved or set aside. By partnering with various organizations, this can be achieved. Specified Risk occurs in the Supply Base based on the FSC US National Risk Assessment (NRA). The NRA has concluded that high conservation values are threatened by forest management activities in some areas (Category 3) and there is conversion occurring from natural forests being converted to plantation or non-forest use (Category 4).	<ul style="list-style-type: none"> • Pre-verification of fiber supply by the Procurement Manager to determine if the fiber is eligible to be used as feedstock and meets Fram's sustainability requirements (FSC, PEFC, SBP, EUTR compliant). Each new residual supplier is evaluated prior to purchasing and if the supplier meets the criteria, then a contract is signed. The potential feedstock is evaluated to make sure it is within Fram's Supply Base Evaluation and assessed against the risks related to forest management activities that might occur in high conservation value forests.

			<ul style="list-style-type: none">• A written contract between the BP and the Supplier which identifies the legal and sustainability requirements, including use of trained loggers and BMP compliance. Loggers who have been trained have the ability to recognize threatened and endangered species and react accordingly. They are also experts in BMPs which protect biodiversity.• Identifying incoming raw materials as either “Certified” or FSC/PEFC Controlled Wood. Maintaining FSC/PEFC certification is ongoing evidence that the risk of accepting feedstock from high conservation value forests is low risk.• Fram has partnered with the American Forest Foundation, the Longleaf Alliance and the Forest Stewards Guild to help conserve forestland in areas identified as Specified Risk by the FSC US NRA. Various conservation initiatives involve, tree planting, invasive species control, prescribed burning, riparian forest buffers, mapping and other initiatives.• Annual supplier correspondence regarding HCVs and other relevant items• Right to audit at the supplier mill or tract level at any time for all types of feedstock.• Monthly BMP compliance inspections on active logging jobs (primary feedstock).
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			<ul style="list-style-type: none"> • Quarterly District of Origin checks on primary feedstocks. • Internal audits by BP on a subset of secondary/tertiary suppliers related to sourcing area, HCVs, conversion, timber legality, etc. Done annually on a sub-set of suppliers with higher risk of entering unacceptable material into the supply chain. • Primary feedstock suppliers encouraged to adopt BMPs for Biomass Harvesting. • Ability to terminate contracts that don't meet sustainability criteria. <p>Specified Risk</p> <p>Central Appalachian Critical Biodiversity Area (CBA)</p> <p>Southern</p> <p>Mitigation Option Conservation Initiatives. Partnership with AFF to conserve acreage. Activities - altering of forest management regimes including extended rotation, as well as invasive species control and aquatic zone protection. Conservation</p>
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			<p>Appalachian CBA</p> <p>Initiatives. Partnership with AFF to conserve acreage. Activities - Activities riparian forest buffer conservation and establishment practices, control of invasive species, mowing, seedling planting and/or other conservation activities. Conservation Initiatives. Partnership with AFF to conserve acreage. Activities - riparian forest buffer conservation and longleaf establishment practices, control of invasive species, mowing, seedling planting and/or other conservation activities.</p> <p>Cape Fear Arch CBA</p> <p>Conservation Initiatives. Partnership with AFF to conserve acreage. Activities - riparian forest buffer conservation and longleaf establishment practices, control of invasive species, mowing, seedling planting and/or other conservation activities.</p> <p>Florida Panhandle CBA</p> <p>Conservation Initiatives. Partnership</p>
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			<p>with AFF to conserve acreage. Activities - Mitigation activities would include altering of forest management regimes including opportunity costs of extended rotation, as well as invasive species control and other potential treatments. Partnership with the Longleaf Alliance to prescribe burn 50,000 acres of natural longleaf stands. Education & Outreach. Partnership with the Longleaf Alliance. Fram is corporate partner. The Alliance sponsors Longleaf Academies which</p>
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			<p>educate landowners and loggers. Avoidance. No suppliers procuring in these counties. Education partnership with Forest Stewards Guild.</p> <p>Avoidance. No suppliers procuring in these counties. Education partnership with Forest Stewards Guild.</p> <p>Mapping. Partner with Forest Stewards Guild to map mesophytic cove sites in Sandy Mush. Conservation Initiatives. Partnership with AFF to conserve acreage.</p> <p>Activities-</p>
			<p>Cheoah Bald Salamander</p>
			<p>Patch-Nosed Salamander</p>
			<p>Mesophytic Cove Sites</p>
			<p>Late Successional Bottomland Hardwoods</p> <p>Mitigation activities would include altering of forest management regimes including opportunity</p>

			<p>costs of extended rotation, as well as invasive species control and other potential treatments. Conservation Initiatives. Partnership with AFF to conserve acreage. Activities - Longleaf pine establishment activities including herbicide treatment, site preparation burn with firebreaks, containerized seedlings; planting labor; understory burning and other activities.</p> <p>Education and Outreach by partnering with the Longleaf Alliance.</p>
United States	2.2.4 The BP has implemented appropriate control	If key ecosystems and habitats are not identified, the appropriate control systems cannot be implemented at the supplier level to protect HCVs which	<p>Native Longleaf Pine Systems</p> <ul style="list-style-type: none"> • Pre-verification of fiber supply by the Procurement Manager to determine if the fiber is eligible to

	<p>systems and procedures to ensure that biodiversity is protected (CPET S5b).</p>	<p>consequently protects biodiversity. In keeping with the FSC US NRA, specified risk has been determined for high conservation value areas and critical biodiversity areas. As part of Fram's FSC/PEFC Controlled Wood Due Diligence Procedure, a management system is in place to address areas with high conservation value forests.</p>	<p>be used as feedstock and meets Fram's sustainability requirements (FSC, PEFC, SBP, EUTR compliant). Each new residual supplier is evaluated prior to purchasing and if the supplier meets the criteria, then a contract is signed. The potential feedstock is evaluated to make sure it is within Fram's Supply Base Evaluation and assessed against the risks related to forest management activities that might occur in high conservation value forests.</p> <ul style="list-style-type: none"> • A written contract between the BP and the Supplier which identifies the legal and sustainability requirements, including use of trained loggers and BMP compliance. Loggers who have been trained have the ability to recognize threatened and endangered species and react accordingly. They are also experts in BMPs which protect biodiversity. • Identifying incoming raw materials as either "Certified" or FSC/PEFC Controlled Wood. Maintaining FSC/PEFC certification is ongoing evidence that the risk of accepting feedstock from high conservation value forests is low risk. • Fram has partnered with the American Forest Foundation, the Longleaf Alliance and the Forest Stewards Guild to help conserve forestland in areas identified as Specified Risk by the FSC US NRA. Various conservation initiatives involve, tree planting, invasive species control,
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			<p>prescribed burning, riparian forest buffers, mapping and other initiatives.</p> <ul style="list-style-type: none"> • Annual supplier correspondence regarding HCVs and other relevant items • Right to audit at the supplier mill or tract level at any time for all types of feedstock. • Monthly BMP compliance inspections on active logging jobs (primary feedstock). • Quarterly District of Origin checks on primary feedstocks. • Internal audits by BP on a subset of secondary/tertiary suppliers related to sourcing area, HCVs, conversion, timber legality, etc. Done annually on a sub-set of suppliers with higher risk of entering unacceptable material into the supply chain. • Primary feedstock suppliers encouraged to adopt BMPs for Biomass Harvesting. • Ability to terminate contracts that don't meet sustainability criteria. <p>Specified Risk Mitigation Option</p> <p>Central Appalachian Critical Biodiversity Area (CBA) Conservation Initiatives. Partnership with AFF to conserve acreage. Activities -</p>
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			<p>altering of forest management regimes including extended rotation, as well as invasive species control and aquatic zone protection. Conservation Initiatives. Partnership with AFF to conserve acreage. Activities - Activities riparian forest buffer conservation and establishment practices, control of invasive species, mowing, seedling planting and/or other conservation activities. Conservation Initiatives. Partnership with AFF to conserve acreage. Activities - riparian forest buffer conservation and longleaf</p> <p>Southern Appalachian CBA</p> <p>Cape Fear Arch CBA</p>
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			<p>establishment practices, control of invasive species, mowing, seedling planting and/or other conservation activities. Conservation Initiatives. Partnership with AFF to conserve acreage. Activities - Mitigation activities would include altering of forest management regimes including opportunity costs of extended rotation, as well as invasive species control and other potential treatments. Partnership with the Longleaf Alliance to prescribe burn 50,000 acres of natural longleaf stands.</p> <p>Florida Panhandle CBA</p>
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			<p>Central Florida CBA</p> <p>Cheoah Bald Salamander</p> <p>Patch-Nosed Salamander</p> <p>Mesophytic Cove Sites</p> <p>Late Successional</p>	<p>Education & Outreach. Partnership with the Longleaf Alliance. Fram is corporate partner. The Alliance sponsors Longleaf Academies which educate landowners and loggers. Avoidance. No suppliers procuring in these counties.</p> <p>Education partnership with Forest Stewards Guild. Avoidance. No suppliers procuring in these counties.</p> <p>Education partnership with Forest Stewards Guild. Mapping. Partner with Forest Stewards Guild to map mesophytic cove sites in Sandy Mush. Conservation Initiatives.</p>
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			<p>Bottomland Hardwoods</p> <p>Partnership with AFF to conserve acreage. Activities- Mitigation activities would include altering of forest management regimes including opportunity costs of extended rotation, as well as invasive species control and other potential treatments. Conservation Initiatives. Partnership with AFF to conserve acreage. Activities - Longleaf pine establishment activities including herbicide treatment, site preparation burn with firebreaks, containerized seedlings; planting labor; understory burning and</p> <p>Native Longleaf Pine Systems</p>
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			<p>other activities.</p> <p>Education and Outreach by partnering with the Longleaf Alliance.</p>
United States	<p>2.4.1 The BP 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).</p>	<p>If forest ecosystems that provide key services are not properly maintained or are negatively impacted by harvesting, then forest health, vitality and other services provided by the forest may be negatively impacted without appropriate controls in place by legislation and the BPs management system. In keeping with the FSC US NRA, specified risk has been determined for high conservation value areas and critical biodiversity areas. As part of Fram's FSC/PEFC Controlled Wood Due Diligence Procedure, a management system is in place to address areas with high conservation value forests.</p>	<ul style="list-style-type: none"> • Pre-verification of fiber supply by the Procurement Manager to determine if the fiber is eligible to be used as feedstock and meets Fram's sustainability requirements (FSC, PEFC, SBP, EUTR compliant). Each new residual supplier is evaluated prior to purchasing and if the supplier meets the criteria, then a contract is signed. The potential feedstock is evaluated to make sure it is within Fram's Supply Base Evaluation and assessed against the risks related to forest management activities that might occur in high conservation value forests. • A written contract between the BP and the Supplier which identifies the legal and sustainability requirements, including use of trained loggers and BMP compliance. Loggers who have been trained have the ability to recognize threatened and endangered species and react accordingly. They are also experts in BMPs which protect biodiversity. • Identifying incoming raw materials as either "Certified" or FSC/PEFC Controlled Wood. Maintaining FSC/PEFC

			<p>certification is ongoing evidence that the risk of accepting feedstock from high conservation value forests is low risk.</p> <ul style="list-style-type: none">• Fram has partnered with the American Forest Foundation, the Longleaf Alliance and the Forest Stewards Guild to help conserve forestland in areas identified as Specified Risk by the FSC US NRA. Various conservation initiatives involve, tree planting, invasive species control, prescribed burning, riparian forest buffers, mapping and other initiatives.• Annual supplier correspondence regarding HCVs and other relevant items• Right to audit at the supplier mill or tract level at any time for all types of feedstock.• Monthly BMP compliance inspections on active logging jobs (primary feedstock).• Quarterly District of Origin checks on primary feedstocks.• Internal audits by BP on a subset of secondary/tertiary suppliers related to sourcing area, HCVs, conversion, timber legality, etc. Done annually on a sub-set of suppliers with higher risk of entering unacceptable material into the supply chain.• Primary feedstock suppliers encouraged to adopt BMPs for Biomass Harvesting.
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			<ul style="list-style-type: none">• Ability to terminate contracts that don't meet sustainability criteria.
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7 Non-conformities and observations

NC number NC-000346 (2021.1)	NC Grading: Minor
Standard:	Instruction Document 5E: Collection and Communication of Energy and Carbon Data 1.4
Requirement:	6.2.3 Where a Reporting Period other than 12 months is used the BP shall justify the Reporting Period used in the SAR. Examples of justifications include: a recent commissioning or a significant change as described in 6.2.2. For recently (re-)commissioned plants, engineering values may be used as verifiable evidence and then actual values should be evaluated after start-up when stable operations have been reached for at least three (3) consecutive months.
Description of Non-conformance and Related Evidence:	
The BP's 6-month reporting period is for June-December 2021 in MM/DD/YYYY format. SARs must be based on the previous reporting period and not projected into the future. The reporting period must also present DD first, rather than MM.	
Timeline for Conformance:	Other
Evidence Provided by Company to close NC:	The SAR reporting period has been updated to 01/01/2021 – 30/06/2021
Findings for Evaluation of Evidence:	Confirmed via review of updated version of SAR.
NC Status:	Closed

8 Certification decision

Based on the auditor's recommendation and the Certification Body's quality review, the following certification decision is taken:	
Certification decision:	Certification approved
Certification decision by (name of the person):	Sebastian Häfele
Date of decision:	22 Jul 2021
Other comments:	N/A