Supply Base Report:

Enviva, LLC - Waycross
First Surveillance Audit

Sustainable Biomass Program
sbp-cert.org



Completed in accordance with the Supply Base Report Template Version 2.2 and SBP Bridging Requirements for Meeting the Directive EU/2023/2413 (REDIII)

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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1 Overview

Producer name:	Enviva, LLC - Waycross
Producer address:	3390 Industrial Boulevard, 31503 Waycross, United States
SBP Certificate Code:	SBP-04-21
Geographic position:	31.256100, -82.417500
Primary contact:	Justin Tait, +44 790 422 4397, Justin.Tait@envivabiomass.com
Company website:	https://www.envivabiomass.com/
Date report finalised:	22 Jun 2026
SBR reporting period from:	01 May 2025
SBR reporting period to:	30 Apr 2026
Name of the Certification Body:	SCS Global Services
Certification Body Approval date:	08 Jul 2026
SBP Standard(s) used:	SBP Standard 1: Feedstock Compliance v2.0, SBP Standard 2: Feedstock Verification v2.0, SBP Standard 4: Chain of Custody v2.0, SBP Standard 5: Collection and Communication of Data v2.0, Instruction Document 1A: SBP Requirements for Primary Feedstock from Trees Outside Forests (TOF) v1.0, Instruction Document 5E: Collection and Communication of Energy and Carbon Data v2.0, Instruction Document EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413 v2.0
Feedstock origin (countries)	United States (-)
Weblink to Standard(s) used:	https://sbp-cert.org/documents/standards-documents/standards

2 Description of the Biomass Producer and the Supply Base

2.1 Description of the company

Enviva was founded in 2004 with a mission to displace fossil fuels, grow more trees, and address climate change. Early on, we realized that the real gap in the biomass energy base was not people building and operating the power plants, rather it was the aggregation and the commoditization of fuel. That's when we focused on sourcing and producing the fuel side of the business, which has been our growth area and the space where we've become the largest player. Today, we've evolved into a leading producer of wood pellets with a focus on the future of biogenic carbon. Enviva operates 10 pellet producing mills across the south. Enviva ships pellets from 6 port locations across the south.

Products included in the scope of SBP Certification: *WB 1.1 Wood pellets*

Number of employees: *1250*

Annual maximum production capacity (metric tonnes): *5500000*

Number of direct feedstock suppliers: *472*

Approximate number of feedstock sub-suppliers: *450*

Description of the chain-of-custody and upstream supply chain:

Enviva maintains multiple chain of custody (CoC) systems to satisfy various certification system requirements. The company has staff well versed in CoC operations. Enviva systems track the required chain of custody information including the necessary infrastructure, designated management representative, product type categories, record keeping and training to ensure the system meets SBP requirements. Enviva operates a Stakeholder Engagement Plan through its transparency partner, Earthworm via the company's Responsible Sourcing Policy. Envia's CoC process includes documented procedures to address non-conforming product, has developed a Risk Matrix to ensure compliance with applicable laws, conducts annual anti-corruption training for staff, complies with OSHA regulation and through its FSC Chain of Custody Core Labor Requirements meets the "decent working conditions" criteria. Envia has a mature Outsourcing program that includes multiple CoC systems. The company maintains records of all suppliers, trains suppliers in the necessary elements of CoC, HCV and other elements such as safe work practices while on an Enviva mill site. Enviva requires suppliers to provide the information included in SBP Standard 4 Section 4.2 and other information to determine origin. Enviva uses a mass balance credit ledger system to track inputs to pellet tons produced and shipped to customers.

2.2 Detailed description of the Supply Base

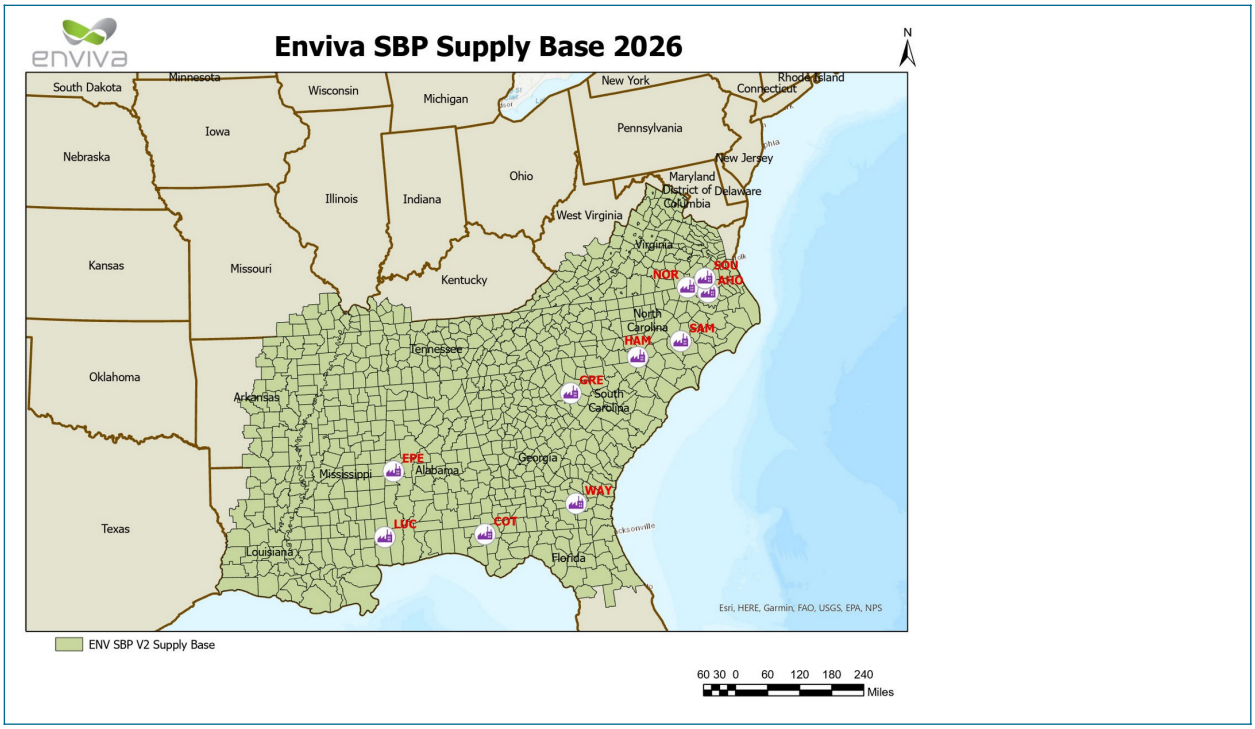
Guidance: Tables below have been generated automatically for each sourcing country based on the selection of 'Feedstock origin (countries)' in section 1 above.

Annex 1 is generated by the system if the SBP SBE is used without Regional Risk Assessment(s) (RRAs). In case RRA(s) is used, further details shall be given only in section 3 below.

Annex 2 is generated if EU RED SBE is in the scope for each country separately.

Country	United States
Area/Region	-
Exclusions	

Feedstock types	Primary, Processing residues1
Feedstock Product Groups	Forest feedstock (1A), Trees outside forest (TOF) - Urban and landscape feedstock (2A), Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock , SBP Controlled feedstock
Is the forest managed to supply energy and non-energy markets?	Yes - Majority
For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?	Yes - Majority
Risk assessment(s)	Yes – Regional Risk Assessment (RRA) used, Yes – Biomass Producer's own risk assessment used (SBE)
Provide a concise summary of why a SBE was determined to be required or not required here:	
U.S. RRA approved for National and private forests, no SBE is required for all feedstocks except TOF. Given that risk associated with Trees Outside of Forest (TOF) is not covered by either RRA, Enviva will rely upon the SBE for its TOF - Urban, Domestic, and Infrastructure risk evaluation. This SBE follows the guidance found in ID1A SBP Requirements for Primary Feedstock from Trees Outside Forests (TOF).	
Feedstock types included in SBE:	Primary, Processing residues1
Includes EU RED SBE:	Yes
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	Yes
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	117.2226
Map(s) of the Supply Base area:	


Enviva SBP Supply Base 2026
N
South Dakota
Minnesota
Wisconsin
Michigan
New York
Rhode Island
Connecticut
Iowa
Pennsylvania
Nebraska
New Jersey
Ohio
Maryland
District of Columbia
Delaware
Illinois
Indiana
West Virginia
Kansas
Missouri
Virginia
Kentucky
NOR
NON
RMD
North Carolina
SAM
HAM
Tennessee
Oklahoma
GRE
Arkansas
South Carolina
Georgia
EPE
Mississippi
Alabama
WAY
Texas
LUC
COT
Louisiana
Florida
Esri, HERE, Garmin, FAO, USGS, EPA, NPS
ENV SBP V2 Supply Base
60 30 0 60 120 180 240
Miles

2.3 Feedstock information

a. **Total volume of Feedstock:** > 1,000,000 tonnes

b. **Volume of primary feedstock:** > 1,000,000 tonnes

c. **List of all the species in primary feedstock, including scientific name:**

Pinus taeda	Loblolly Pine
Pinus palustris	Longleaf Pine
Pinus palustris	Longleaf Pine
Pinus clausa	Sand Pine
Pinus spp	Pine
Prunus spp	Cherry
Nyssa sylvatica	Black Gum
Quercus spp	Oak
Juglans spp	Walnut
Celtis occidentalis	Hackberry
Carya spp	Hickory
Carya illinoinensis	Pecan
Diospyros virginiana	Persimmon
Taxodium ascendens	Pond Cypress
Persea borbonia	Red Bay
Acer spp.	Maple
Betula spp	Birch
Magnolia grandiflora	Magnolia
Persea palustris	Swamp Bay
Magnolia virginiana	Sweet Bay
Liquidambar styraciflua	Sweetgum
Platanus occidentalis	Sycamore
Nyssa aquatica	Water Tupelo
Liriodendron tulipifera	Yellow Poplar
Ilex opaca	Holly

d. **Was the feedstock used in the biomass removed from a forest as part of a pest/disease control measure or a salvage operation?** Yes - Minority

Explanation: Enviva's sourcing area is within an area where Southern Pine Beetle (SPB) infestation is a known threat to pine stands. The recommended treatment for a stand infested with SPB is to perform salvage harvest and harvest ahead of the infestation point to slow movement of the pest, and at times wood from such harvest could come to Enviva. Extreme weather events such as hurricanes and tornadoes also take place with the Enviva supply base and salvage wood harvested from storm damaged stands can also be delivered to Enviva.

e. **Hardwood (i.e. broadleaf trees): specify proportion of feedstock from (%)**: 7.00

f. **Softwood (i.e. coniferous trees): specify proportion of feedstock from (%):** 93.00

g. **Proportion of feedstock composed of or derived from saw logs by weight (%):** 0.00

h. **Indicate how you determine the proportion of saw log:** Specification used by the sawmill closest to where the wood was grown.

i. **Roundwood from fellings from forests with > 40 yr rotation times - Average % volume of fellings delivered to BP (%):** 10.00

j. **Select forest type(s) where the primary feedstock was sourced from:** Mix of The Above

k. **Select the main harvesting system(s) used for the sourced primary feedstock:** Mix of the above

l. **Volume of primary feedstock from primary forest:** 0

m. **Volume of processing residues feedstock:** 400,000-600,000 tonnes
Physical form of the feedstock: Chips, Sawdust, Clean chips or dust, Other (specify)

n. **Share of SBP-recognised system claim for processing residues:**

o. **Volume of post-consumer feedstock:** 0
Physical form of the feedstock: Chips, Sawdust, Clean chips or dust, Other (specify)

p. **Estimated amount of EU RED-compliant sustainable feedstock that could be collected annually by the BP:** 9081187 tonnes

q. **What is the estimated amount of EU RED-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated):** 254011727.00 tonnes

Explanation: Based on information found in the National Council for Air and Stream Improvement Briefing Note 22-02 Trends in Forest Harvest, Regeneration, and Management in the Southeastern United States as Related to Biomass Feedstock. The estimate includes the states of Alabama, Arkansas, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina South Carolina, Tennessee, Texas and Virginia. Enviva also commissioned NCASI to conduct a similar analysis for the entire Enviva supply base including the original 12 states plus counties in Missouri and West Virginia in 2024 (Enviva Supply Base Forestland Analysis).

3 Supply Base Risk Assessments and Risk Management Measures

Guidance: Biomass Producers shall demonstrate that any specified risks of sourcing feedstock not in compliance with SBP Standard 1 have been adequately reduced to low risk, following Standard 2 requirements. Following section applies to Biomass Producer's implementing SBP Supply Base Evaluation (SBP RRA or company own risk assessment). EU RED Supply Base Evaluation details are reported in Annex 2.

☐ **Not Applicable – Supply Base Evaluation not implemented**

3.1 Summary of the Supply Base Evaluation

Enviva determine the supply base area by incorporating all 10 of its operating mills supply base areas and adding in the Enviva Epes supply base area. A map of the combined supply base area can be found in section 2.2 of this report. Enviva conducted a SBE for all feedstocks, regardless of certification claim, to determine SBP compliance. Enviva used the process developed by SBP as outlined in SBP Standard 2: Verification of SBP-compliant Feedstock and developed a Risk Assessment process. Supply Base Verifiers were documented at the federal and state level. Then each indicator was evaluated through a Risk Evaluation Framework (REF)

· Federal and/or state laws and regulations proved sufficient to determine low risk. (REF1)

· If existing laws and/or regulations were not determined to be strong enough or did not exist then the indicator was supplemented/evaluated using credible third-party Information from organizations like the National Council for Air and Stream Improvement, United States Forest Service Forest Inventory Analysis, Southern Group of State Foresters, National Association of State Foresters, etc. (REF2)

· Documentation of regulatory agencies and enforcement agencies, implementation of forestry best management practices, etc. (REF3)

· Results from data monitoring, enforcement and other publicly available data. (REF4)

The FSC US CWNRA was used as a baseline to determine if areas of high conservation value, biodiversity and conversion exist in Enviva's supply base area. Additionally, Enviva works with organizations like the US Endowment for Forestry and Communities, The Long Leaf Alliance, The Nature Conservancy and the American Forest Foundation and others to better understand our sourcing areas, habitats and species of concern. And lastly consulted the SBP Regional Risk Assessment for US Private Forests (SBP-RRA US) to verify alignment with the document.

Once risk was established Enviva developed a Risk Management Plan (RMP) detailing the Risk Management Measures (RMM) for the specified risk indicators based on the suggested guidance found in the SBP RRA US. Based on this work and local knowledge Enviva determined a rating of "low risk" for each indicator apart from 2.1.3, 2.2.1, 2.2.2, and 3.1.1.

3.2 Conflicts with applicable national and sub-national legislation

No conflicts with federal or state laws and regulations.

3.3 Risk Management Measures

Guidance: Please provide more details about specified risk indicators in each supply country and describe mitigation measures taken to address all specified risks associated with indicators.

Country: United States

Area/sub-scope: Southeast and eastern southcentral	
Risk Assessment used:	
	☐SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☒SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.1.3 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.	
Description of the specific risk:	

Enviva used the FSC US CWNRA as a basis to identify and map forested areas of high conservation value, areas of high biodiversity and species of concern and evaluate the risks due to feedstock sourcing,
The areas of high conservation value described and mapped in the FSC US CWNRA were compared to the defined supply area. The FSC US CWNRA identified many areas of high conservation value, biodiversity and species that could be affected by harvesting activities. The supply base area overlaps the following areas of high conservation value.

FSC US CWNRA areas and species within the Enviva supply base (descriptions in the Annex indicator)
Category 3 High Conservation Values

HCV 1 Species Diversity
Critical Biodiversity Areas (CBA)

- Central Appalachian Critical Biodiversity Area
- Florida Panhandle Critical Biodiversity Area
- Central Florida Critical Biodiversity Area
- Southern Appalachian Critical Biodiversity Area

- Cape Fear Critical Biodiversity Area

Species

- Cheoah Bald Salamander

- Dusky Gopher Frog

- Patch-nosed Salamander

HCV 3 High Conservation Values

- Late Successional Bottomland Hardwoods
- Native Longleaf Pine Systems
- Mesophytic Cove Sites

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- Late Successional Bottomland Hardwoods
- Native Longleaf Pine Systems
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Beyond the FSC CWNRA findings Sustainable Forestry Initiative certificate holders are required to consider G1 & G2 species. Federal and state laws vary in recognition of key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity. Application of these laws vary. For instance, the federal Threatened and Endangered Species Act applies to both public and private lands. Though evaluation and protect/enhancement of G1/S1 & G2/S2 species and habitats are voluntary. Additional publicly available information was used to identify the gaps.
Specific Risks for Category 3 High Conservation Values HCV 1 Species Diversity

Central Appalachian Critical Biodiversity Area
Mixed Mesophytic Forests - Historically, forest management activities threatened and had significant negative impacts on the Mixed Mesophytic Forests of this CBA and there are lasting impacts from these activities today. Currently, however, widespread threats from forest management activities are not identified. Instead, the priority threats to the forests as a whole include: climate change, pollution from mining, new highways and utility rights-of-way, ORV recreation and overpopulation of deer.

Aquatic Habitats - In addition to threats associated with agriculture, development, and mining, the following threats were associated with forest management: Hydrologic alteration partially due to forestry practices and conversion from hardwood forests to non-native planted pine (which may include ditching as a practice in wetter areas), reduced water quality partially due to loss of near-stream forested habitat and sedimentation

associated with forestry.

Florida Panhandle Critical Biodiversity Area
Apalachicola Bay/River System: Threats to this aquatic system are varied and include persistent drought resulting in reduced flow level, loss of floodplain and wetland habitat due to reduced flow levels, point and non-point source pollution (including sediments from forestry operations due to insufficient ground cover and inadequate buffers), unrestrained growth and development. FSC® US NRA Specified Risk Fact Sheet the Apalachicola River and Bay Surface Water Improvement and Management Plan identifies implementation of silvicultural Best Management Practices (BMPs) as a significant component of one of its priority projects.

Longleaf Pine Savanna: Biodiversity values can be adversely affected by forest management activities via conversion of longleaf to other pine types, and the use management techniques, including herbicide application that have the potential to inhibit native understory communities. As the bulk of the biodiversity exists in the understory of a longleaf pine system, restoration or maintenance of understory species composition is an essential component of longleaf pine conservation. Other threats include fire-suppression, urban development, fragmentation, nonnative species, and climate change. It is possible to harvest in and sustainably manage longleaf pine systems and therefore timber management by itself is not considered a threat.

Steephead Ravines: Reported threats include altered hydrologic regimes, conversion to other land uses, fire suppression. Forestry practices were identified as a low source of stress to the habitat in the Florida Wildlife Action Plan.

Central Florida Critical Biodiversity Area
Reported threats to Pine flatwoods include conversion to agriculture and pine plantations, non-native species (including invasion by melaleuca if logged and over drained), hydrologic alteration, substrate disturbance (Wiregrass may not withstand disturbance associated with planting pine), alteration of fire regimes, and recreational damage. Forestry practices were identified as a high source of stress to the natural pineland habitat in the Florida Wildlife Action Plan, in association with the following stresses which all had high ranks for the habitat: altered fire regime, altered hydrologic regime, habitat destruction or conversion, altered community structure, altered species composition/dominance, and fragmentation of habitats, communities, ecosystems.

Southern Appalachian Critical Biodiversity Area
Aquatic Habitats – Conservation actions that are needed for protection include: minimize nonpoint source pollution in waterways, including from silvicultural sources; minimize disturbance to riparian zones, including from forestry, and minimize or better manage use of fertilizers, herbicides and pesticides near aquatic habitats (and forest practices were identified as a source for this threat). Implementation of forestry Best Management Practices (BMPs) are specifically mentioned as methods for achieving these actions.

Glades – Threats include grazing, non-native species, quarrying, root-digging, plant and animal collecting, removal of large rocks for landscaping, urban development, plowing for fire breaks, use as logging decks (resulting in soil/vegetation disturbance and soil erosion), conversion to other land uses, and ORV damage. No threats from forest management activities were identified.

Montane Longleaf Pine – Biodiversity values can be adversely affected by forest management activities via conversion of longleaf to other pine types, and the use management techniques, including herbicide application that have the potential to inhibit native understory communities. As the bulk of the biodiversity

exists in the understory of a longleaf pine system, restoration or maintenance of understory species composition is an essential component of longleaf pine conservation. It is possible to harvest in and sustainably manage longleaf pine systems and therefore timber management by itself is not considered a threat. Other threats include fire-suppression, urban development, forest conversion, non-native species, climate change.

Cape Fear Arch Critical Biodiversity Area
Pocosins: When the canopy has been completely removed through timber harvest, pocosins often do not regenerate. An associated threat from forest management is the conversion of native pine to planted pine and resulting loss of biodiversity, particularly if associated with changes in hydrology due to ditching. Other threats include hydraulic alteration, conversion to agriculture, road construction, and sand quarrying, habitat fragmentation, introduction of non-native species, climate change and fire suppression.

Longleaf Pine: Biodiversity values can be adversely affected by forest management activities via conversion of longleaf to other pine types, and the use management techniques, including herbicide application that have the potential to inhibit native understory communities. As the bulk of the biodiversity exists in the understory of a longleaf pine system, restoration or maintenance of understory species composition is an essential component of longleaf pine conservation. It is possible to harvest in and sustainably manage longleaf pine systems and therefore timber management by itself is not considered a threat. Other threats include fire-suppression, urban development, fragmentation, nonnative species, intensive pine straw raking, and climate change.

Cheoah Bald Salamander
G1G2; S1S2 (North Carolina); Forest & woodland habitats; Clear cutting is a major threat to local populations. Some populations have been found in second growth forests, providing evidence that they are able to re-populate after harvest, but literature suggests it takes decades and with so few known populations extant, that kind of disruption could have a significant effect on the species as a whole. The 1994 Amendment to the Nantahala National Forest Plan included new definitions of management areas that provide an indication of whether timber management will likely occur. The Cheoah Bald area is located within management areas that at this time either do not allow timber management or are identified as being likely unsuitable for timber management. However, as the species' range is not yet fully delineated, it is not possible to know whether all or most of the range occurs within these management areas.

Dusky Gopher Frog
The Dusky Gopher Frog depends on woodlands, forested wetlands and riparian habitats. The major threats to the species include population isolation, urbanization, disease, and a lack of suitable habitat. Habitat degradation is a significant factor, driven by multiple sources including, changes in forest type from longleaf FSC® US NRA Specified Risk Fact Sheet pine to other forest types, forest degradation caused by grazing and the disruption of the natural fire regime, and land management practices that alter the soil horizon, forest litter, herbaceous community, and the occurrence of down woody debris. Timber site prep and other forestry practices that alter temporary wetlands can damage breeding areas.

Patch-nosed Salamander
G1; S1 (Georgia); Riparian habitat; Little is known about this species and specific threats have not yet been documented. However, any factor that would disrupt water flow, canopy cover, or leaf-litter layer would likely impact the species. As all of these can potentially be affected by forest management, a precautionary approach should be taken.

G1 (Critically Imperiled) & G2 (Imperiled)
Critically Imperiled – At very high risk of extinction or elimination due to very restricted range, very few populations or occurrences, very steep declines, very severe threats, or other factors.
Imperiled – At high risk of extinction or elimination due to restricted range, few populations or occurrences, steep declines, severe threats, or other factors.

NatureServe and state Natural Heritage Programs contain the most up to date information regarding G1 & G2 species. In the supply base area most of these species are associated with streams and other water features.

Mitigation measure:

Enviva's entire supply base for all primary and secondary sourcing has been compared to the areas of "specified risk" identified in the US CW NRA to determine the risk that are pertinent to our operations. Not all risk areas are equally impacted across the supply base. Appropriate mitigation levels have been determined by using a mitigation level matrix and considering the specific sourcing impacts of each Enviva facility. In cases where multiple facilities overlap specified risk areas, increased mitigation will be provided. Enviva sources secondary residual feedstocks that result in expanded supply bases that extend well beyond a traditional hauling radius. A detailed analysis of mitigation requirements has been developed for those sources.

Enviva is committed to only source wood from forest where High Conservation Values are not threatened by harvest activities as outlined in the Enviva Responsible Sourcing Policy. This policy is publicly available on the company website and is contained within the Master Wood Purchase Agreement (MWPA) signed by suppliers. Enviva has adopted the High Conservation Value Network Approach (HCVNA) to make sure HCV's not only persist in the landscape, but are enhanced over time. The HCVNA is a globally applicable approach that can be implemented on a variety of landscapes. This approach defines 6 HCV types, but only 4 are applicable to the southeast US.

HCV Network Approach HCV Types	Enviva HCV Policy Focus
1) Species Diversity	Imperiled Species (G1,G2,S1,S2)
2) Landscape Level Ecosystems	Not Applicable in the SE US
3) Ecosystems and Habits	Bottomland Hardwood, Longleaf Pine
4) Ecosystem Services	Water Quality, BMP's
5) Community Needs	Not Applicable in the SE US
6) Cultural Values	Native American Sacred Sites

HCV Type 2 (Landscape Level Ecosystems) applies to large and undisturbed landscapes similar to Intact Forest Landscapes as defined by the World Resources Institute (WRI). Any areas in the southeast US meeting this criteria are already under federal protection. HCV Type 5 (Community Needs) describes forest that are solely relied upon for survival of indigenous people groups without assistance from outside resources, and those areas do not exist in the southeast US.

Mitigation measures for Category 3 High Conservation Values
To address mitigation of Category 3 High Conservation Values Enviva adopted the High Conservation Value

Approach. HCVNA involves 3 steps: identification of the HCV, management of the species or ecosystem, and monitoring to verify the effectiveness of the management practices. For identification of HCV's, Enviva will utilize internally developed mapping data for critically imperiled/imperiled species (G1, G2, S1, and S2), the US Fish and Wildlife Service Wetlands Mapper for bottomland hardwood, Longleaf Pine mapping data from the Longleaf Alliance, and sacred site mapping provided by Earthworm. Management of identified HCV's within harvest areas will be on a case-by-case basis utilizing in-house forestry expertise. Monitoring will be conducted through inspections with the Longleaf Pine assessment plots reviewed by the Longleaf Alliance, and Enviva's BMP assessment process. Based upon monitoring results, management practices will be improved as needed.

After Commodity Managers have collected Track & Trace® data for the prospective harvest location, they will check the tract boundary in ArcGIS. All the mapped HCV data layers will be available in ArcGIS and the Commodity Manager will compare the harvest area with the map layers to see if overlap exist. If a stand overlaps an HCV Area, there are a series of due diligence workflows in place to guide harvest and management guidelines. Site visits, harvest options, and secondary triggers are all part of these workflows. The Bottomland Hardwood Workflow ultimately requires executive approval for harvest, but the other workflows do not since they are based on conservation community recommendations.

Outreach and Education
Enviva requires all primary suppliers to complete an online course titled Enviva Responsible Sourcing Guidance for Suppliers. The training covers Enviva's commitment to protecting HCV areas of concern – Enviva does not harvest or source from areas of special concern that we have identified in partnership with leading conservation organizations. We use a High Conservation Value (HCV) Network approach to determine and protect HCVs. All tracts are required to undergo a pre-delivery assessment for the presence of HCV features. Those tracts found to contain HCV features must pass through our HCV field assessment and approval process before fiber may be delivered to one of Enviva's facilities. HCVs are:

- Bottomland Hardwoods,
- Low Pocosins,
- Atlantic White Cedar,
- Carolina Bays,
- Cypress Tupelo swamps,
- Longleaf Pine,

- Imperiled Species,

- Cultural HCVs.

The goal of the HCV Network Approach is to identify areas of exceptional value and make sure those HCV's persist on the landscape over time and that they are maintained and / or enhanced by harvest operations.

- Best Management Practices – Suppliers must adhere to state BMPs. To comply with BMPs, Logger Training must be maintained in order to deliver to any Enviva facility. Enviva Procurement and Sustainability Foresters will conduct random site visits on a selection of active and non-active harvests to verify BMP compliance.

- Certification support – Enviva maintains multiple forestry certifications, including the Sustainable Forestry Initiative® (SFI), Forest Stewardship Council® (FSC), Programme for Forest Stewardship (PEFC), and the Sustainable Biomass Program (SBP).

Track & Trace – Track & Trace is a requirement to deliver primary volume to Enviva. Primary volume is considered to be inwoods volumes, including fuel only purchases from tracts. Track & Trace is not required for volumes from mills as residual secondary or tertiary sources, chip mills, wood yards, nor arboricultural volumes. CCommodity Managers are trained to understand what Enviva identifies as an HCV, how to evaluate a potential source tracts to determine if there is overlap of potential HCV area and work with suppliers to avoid the HCV area or if harvesting can enhance the HCV then suggest management recommendations to do so.

Secondary and tertiary feedstock suppliers are evaluated through an in-person District of Origin audit. The audit confirms species used, procurement radius or counties, if the supplier has a sustainability policy, level of information collected from supplier regarding origin of wood, certification status, and other pertinent information to determine their understanding of their supply chain. Each mill is evaluated via mapping with known HCV areas. Each supplier is furnished with a map showing HCV overlap and appropriate HCV information.

Procurement Policy
Enviva's Master Wood Purchase Agreement clearly defines Enviva's procurement policies. Enviva requires all suppliers to sign a Master Wood Supply Agreement. The Agreement requires suppliers to abide by forest management activities regulations. Enviva uses contractual language in its Master Wood Purchase Agreement requiring suppliers to abide by all relevant laws and regulations and maintain a trained logger status. The contract includes the requirement to avoid the following unacceptable sources wood:

- Illegally harvested wood

- Wood harvested in violation of traditional and civil rights.

- Wood harvested from forests where high conservation values are threatened by management activities.

- Wood harvested from old growth or semi-natural forests being converted to plantations or nonforest use.

- Wood from forests where genetically modified trees are planted.

- Wood in which there was a violation of the ILO Declarations on fundamental principle and rights at work.

Additionally, the document includes Enviva land use change policy clearly describing the company's desire to avoid feedstock produced from land use change tracts.

Implement Management Activities & Landowner Incentives
Enviva has been working with The Longleaf Alliance (TLA) to help restore Longleaf pine (LLP) to the southeast. The effort is multi-faceted.

- Landowner outreach through workshops

- Direct payment for Longleaf pine restoration plans through The Longleaf Alliance partner the Sandhill Prescribed Burn Association (SPBA)

- Documenting the restoration of Longleaf pine through feedstock purchasing from tracts that historically where but planted in a different species and the landowner wishes to convert the forest back to Longleaf

- Provide seedings each year to assist landowners in meeting their LLP objectives

BMP Monitoring
Enviva conducts field inspections including forestry BMPs at two stages. All inspections are scored and the score used to identify poor performers or areas where a supplier could improve

- Ongoing site inspection – to engage with suppliers while on-site to prevent potential BMP infractions

- Post-harvest site inspections – to ensure Enviva agrees the harvest site was properly closed out

Monitoring and outcomes:

Outreach and Education

1. Ensure Enviva primary suppliers complete and sign annual supplier education materials
2. Ensure Enviva Commodity Managers and Stumpage staff understand and sign annual education materials
3. Ensure forestry BMPs are properly applied through field inspections
4. Ensure secondary and tertiary suppliers complete their DOO audit and conform to Enviva's HCV policy

Procurement Policy

1. Ensure suppliers have signed an MWPA or similar document demonstrating they understand the procurement policy details pertaining to HCVs, BMPs and/or Track & Trace/DOO as appropriate
2. Monitor via tract set up, remote sensing, and field inspections
3. Monitor supplier trained logger status

Implement Management Activities & Landowner Incentives Continue working with TLA to

1. Hold landowner workshops
2. Track the number of landowners receiving LLP restoration plans through the SPBA
3. Track the conversion of other pine forest types to LLP
4. Provide LLP seedlings to landowners assisting them in meeting their LLP restoration objectives

BMP Monitoring

1. Ensure Commodity Managers and stumpage staff complete the necessary field inspections
2. Where necessary work with suppliers to improve their BMP score

Country: United States

Area/sub-scope: Southeast and eastern southcentral

Risk Assessment used:	
	☐SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☒SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.1.1 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.	
Description of the specific risk:	

As described in Annex 1 Enviva focused on forest conversion since there is adequate protection for wetlands and peatlands vis the Clean Water Act. Enviva does not source from highly biodiverse grasslands so it is excluded in the RMP.

Conversion: The FSC US CWNRA definition of conversion does not align with the SBP focusing on population growth and the issuance of building permits; focusing on urban development. In summary the authors found, "Rates of urban development vary throughout the United States with higher rates in the Pacific Coast Region and portions of the Southeast Region. These two regions are also the regions identified as experiencing more recent forestland loss. Therefore, the greatest risk of materials entering the supply chain from conversions will most likely be in these two regions; however, the risk is not consistent across the regions. FSC identified 46 counties within the Enviva supply base are at risk of conversion due to urban development.

The SBP definition for conversion is much broader, "The process of changing or causing to change from one form to another". Though we recognize the identification of counties conducted under the FSC process, Enviva's approach is more stringent, we avoid harvests where the forest will not be regenerated into a new forest.

There are not laws in states included in the supply base assessment prohibiting a landowner from converting a forest to another land use. Some local zoning laws and regulations may have a small local impact.

Enviva requested the National Council for Air and Stream Improvement to conduct a resource analysis of the supply base area. From 2010 to 2020 the report indicates a -1% reduction in forestland area. Similar results are included the SBP RRA US draft citing a -1% reduction in timberland. Though the potential for conversion of forest is low Enviva is aware of conversion in its supply base area.

Personal property rights allow the owner to enjoy their property including the right to convert it to another use. Transfer of property through sale may find the next owner with differing opinions on what to do with the property.

Mitigation measure:

Enviva requires all primary suppliers to complete an online course titled Enviva Responsible Sourcing Guidance for Suppliers. The training covers Enviva's commitment to avoiding Land Use Change. Enviva will not knowingly accept wood from land use change (LUC) / conversion sources. Suppliers are required to confirm with the landowner that they intend to keep their tract forested after harvest, for every tract sourced for Enviva.

Commodity Managers are trained to understand what Enviva identifies as land use change, how to evaluate a potential source tract to determine if there is overlap of potential HCV area and work with suppliers to avoid the HCV area or if harvesting can enhance the HCV then suggest management recommendations to do so.

Secondary and tertiary feedstock suppliers are evaluated through an in-person District of Origin audit. The audit confirms species used, procurement radius or counties, if the supplier has a sustainability policy, level of information collected from supplier regarding origin of wood, certification status, and other pertinent information to determine their understanding of their supply chain including the likelihood for land use change and if they source land use change wood. If yes, we decline them as a supplier. If, through audit we determine the supplier was dishonest, according to Enviva Responsible Sourcing Policy, we can work with them to improve their performance or cease doing business with them.

Enviva's Master Wood Purchase Agreement clearly defines Enviva's procurement policies. Enviva requires all suppliers to sign a Master Wood Supply Agreement. The Agreement requires suppliers to abide by forest management activities regulations and maintain a trained logger status. Enviva uses contractual language in its Master Wood Purchase Agreement requiring suppliers to abide by all relevant laws and regulations. The contract includes the requirement to avoid the following unacceptable sources wood:

- Illegally harvested wood
- Wood harvested in violation of traditional and civil rights.
- Wood harvested from forests where high conservation values are threatened by management activities.
- Wood harvested from old growth or semi-natural forests being converted to plantations or nonforest use.
- Wood from forests where genetically modified trees are planted.

- Wood in which there was a violation of the ILO Declarations on fundamental principle and rights at work.

Additionally, the document includes Enviva land use change policy clearly describing the company's desire to avoid feedstock produced from land use change tracts

As part of Enviva's Responsible Sourcing Policy the company is a member of Keeping Forests. Keeping Forests is a non-profit striving to support landowners in their efforts to keep forest as forest. They do this by working with conservation leaders show how responsible forest management can lead to the long-term vitality of southern forest. Promote the use of forest products coming from southern forest and evaluates emerging markets that may compensate a landowner for benefits such as clean air and clean water that originates from their forest.

Monitoring and outcomes:

1. Ensure suppliers receive training covering the company's desire to avoid land use change to limit its potential.
2. Monitor supplier trained logger status
3. Field inspections – Commodity Managers and Sustainability Foresters complete field inspections for BMP use and visually ensure the tract does not have signs of future conversion to ensure we are sampling for it.
4. Regeneration monitoring – looking back 3 years remotely sense for land use change on tracts where Enviva sourced wood. Look for commonality in land ownership, suppliers or other data points Enviva can use to make better sourcing decisions.

Country: United States

Area/sub-scope: Southeast and eastern south central

Risk Assessment used:

	☐SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim

	☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment

Indicator with specified risk:

2.2.2 Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.

Description of the specific risk:

Enviva conducted a risk assessment of federal and state laws and regulations and determined there is a sufficient and enforced legal structure in place to ensure feedstock sourcing and Enviva operations comply. These laws address various components of the indicator requirements but do not completely ensure without a field verification process driven by a company's commitment to sustainability policies and enforcement of the same. For examples of laws/regulation please refer to Annex 1 indicators 2.1.1, 2.1.2 and 2.1.3.

Enviva used the FSC US CWNRA as a basis to identify and map forested areas of high conservation value, areas of high biodiversity and species of concern and evaluate the risks due to feedstock sourcing.

The areas of high conservation value described and mapped in the FSC US CWNRA were compared to the defined supply area. The FSC US CWNRA identified many areas of high conservation value, biodiversity and species that could be affected by harvesting activities. The supply base area overlaps the following areas of high conservation value.

FSC US CWNRA areas and species within the Enviva supply base (descriptions in the Annex indicator)
Category 3 High Conservation Values
HCV 1 Species Diversity

- Critical Biodiversity Areas (CBA)
- Central Appalachian Critical Biodiversity Area
- Florida Panhandle Critical Biodiversity Area
- Central Florida Critical Biodiversity Area
- Southern Appalachian Critical Biodiversity Area
- Cape Fear Critical Biodiversity Area

Species

- Cheoah Bald Salamander

- Dusky Gopher Frog

- Patch-nosed Salamander

HCV 3 High Conservation Values

- Late Successional Bottomland Hardwoods

- Native Longleaf Pine Systems

- Mesophytic Cove Sites

Beyond the FSC CWNRA findings Sustainable Forestry Initiative certificate holders are required to consider G1 & G2 species. Federal and state laws vary in recognition of key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity. Application of these laws vary. For instance, the federal Threatened and Endangered Species Act applies to both public and private lands. Though evaluation and protect/enhancement of G1/S1 & G2/S2 species and habitats are voluntary. Additional publicly available information was used to identify the gaps.

Specific Risks for Category 3 High Conservation Values HCV 1 Species Diversity
Central Appalachian Critical Biodiversity Area
Mixed Mesophytic Forests - Historically, forest management activities threatened and had significant negative impacts on the Mixed Mesophytic Forests of this CBA and there are lasting impacts from these activities today. Currently, however, widespread threats from forest management activities are not identified. Instead, the priority threats to the forests as a whole include: climate change, pollution from mining, new highways and utility rights-of-way, ORV recreation and overpopulation of deer.

Aquatic Habitats - In addition to threats associated with agriculture, development, and mining, the following threats were associated with forest management: Hydrologic alteration partially due to forestry practices and conversion from hardwood forests to non-native planted pine (which may include ditching as a practice in wetter areas), reduced water quality partially due to loss of near-stream forested habitat and sedimentation associated with forestry.

Florida Panhandle Critical Biodiversity Area
Apalachicola Bay/River System: Threats to this aquatic system are varied and include persistent drought resulting in reduced flow level, loss of floodplain and wetland habitat due to reduced flow levels, point and non-point source pollution (including sediments from forestry operations due to insufficient ground cover and inadequate buffers), unrestrained growth and development. FSC® US NRA Specified Risk Fact Sheet the Apalachicola River and Bay Surface Water Improvement and Management Plan identifies implementation of

silvicultural Best Management Practices (BMPs) as a significant component of one of its priority projects.

Longleaf Pine Savanna: Biodiversity values can be adversely affected by forest management activities via conversion of longleaf to other pine types, and the use management techniques, including herbicide application that have the potential to inhibit native understory communities. As the bulk of the biodiversity exists in the understory of a longleaf pine system, restoration or maintenance of understory species composition is an essential component of longleaf pine conservation. Other threats include fire-suppression, urban development, fragmentation, nonnative species, and climate change. It is possible to harvest in and sustainably manage longleaf pine systems and therefore timber management by itself is not considered a threat.

Steephead Ravines: Reported threats include altered hydrologic regimes, conversion to other land uses, fire suppression. Forestry practices were identified as a low source of stress to the habitat in the Florida Wildlife Action Plan.

Central Florida Critical Biodiversity Area
Reported threats to Pine flatwoods include conversion to agriculture and pine plantations, non-native species (including invasion by melaleuca if logged and over drained), hydrologic alteration, substrate disturbance (Wiregrass may not withstand disturbance associated with planting pine), alteration of fire regimes, and recreational damage. Forestry practices were identified as a high source of stress to the natural pineland habitat in the Florida Wildlife Action Plan, in association with the following stresses which all had high ranks for the habitat: altered fire regime, altered hydrologic regime, habitat destruction or conversion, altered community structure, altered species composition/dominance, and fragmentation of habitats, communities, ecosystems.

Southern Appalachian Critical Biodiversity Area
Aquatic Habitats – Conservation actions that are needed for protection include: minimize nonpoint source pollution in waterways, including from silvicultural sources; minimize disturbance to riparian zones, including from forestry, and minimize or better manage use of fertilizers, herbicides and pesticides near aquatic habitats (and forest practices were identified as a source for this threat). Implementation of forestry Best Management Practices (BMPs) are specifically mentioned as methods for achieving these actions.

Glades – Threats include grazing, non-native species, quarrying, root-digging, plant and animal collecting, removal of large rocks for landscaping, urban development, plowing for fire breaks, use as logging decks (resulting in soil/vegetation disturbance and soil erosion), conversion to other land uses, and ORV damage. No threats from forest management activities were identified.

Montane Longleaf Pine – Biodiversity values can be adversely affected by forest management activities via conversion of longleaf to other pine types, and the use management techniques, including herbicide application that have the potential to inhibit native understory communities. As the bulk of the biodiversity exists in the understory of a longleaf pine system, restoration or maintenance of understory species composition is an essential component of longleaf pine conservation. It is possible to harvest in and sustainably manage longleaf pine systems and therefore timber management by itself is not considered a threat. Other threats include fire-suppression, urban development, forest conversion, non-native species, climate change.

Cape Fear Arch Critical Biodiversity Area
Pocosins: When the canopy has been completely removed through timber harvest, pocosins often do not

regenerate. An associated threat from forest management is the conversion of native pine to planted pine and resulting loss of biodiversity, particularly if associated with changes in hydrology due to ditching. Other threats include hydraulic alteration, conversion to agriculture, road construction, and sand quarrying, habitat fragmentation, introduction of non-native species, climate change and fire suppression.

Longleaf Pine: Biodiversity values can be adversely affected by forest management activities via conversion of longleaf to other pine types, and the use management techniques, including herbicide application that have the potential to inhibit native understory communities. As the bulk of the biodiversity exists in the understory of a longleaf pine system, restoration or maintenance of understory species composition is an essential component of longleaf pine conservation. It is possible to harvest in and sustainably manage longleaf pine systems and therefore timber management by itself is not considered a threat. Other threats include fire-suppression, urban development, fragmentation, nonnative species, intensive pine straw raking, and climate change.

Cheoah Bald Salamander
G1G2; S1S2 (North Carolina); Forest & woodland habitats; Clear cutting is a major threat to local populations. Some populations have been found in second growth forests, providing evidence that they are able to re-populate after harvest, but literature suggests it takes decades and with so few known populations extant, that kind of disruption could have a significant effect on the species as a whole. The 1994 Amendment to the Nantahala National Forest Plan included new definitions of management areas that provide an indication of whether timber management will likely occur. The Cheoah Bald area is located within management areas that at this time either do not allow timber management or are identified as being likely unsuitable for timber management. However, as the species' range is not yet fully delineated, it is not possible to know whether all or most of the range occurs within these management areas.

Dusky Gopher Frog
The Dusky Gopher Frog depends on woodlands, forested wetlands and riparian habitats. The major threats to the species include population isolation, urbanization, disease, and a lack of suitable habitat. Habitat degradation is a significant factor, driven by multiple sources including, changes in forest type from longleaf FSC® US NRA Specified Risk Fact Sheet pine to other forest types, forest degradation caused by grazing and the disruption of the natural fire regime, and land management practices that alter the soil horizon, forest litter, herbaceous community, and the occurrence of down woody debris. Timber site prep and other forestry practices that alter temporary wetlands can damage breeding areas.

Patch-nosed Salamander
G1; S1 (Georgia); Riparian habitat; Little is known about this species and specific threats have not yet been documented. However, any factor that would disrupt water flow, canopy cover, or leaf-litter layer would likely impact the species. As all of these can potentially be affected by forest management, a precautionary approach should be taken.
G1 (Critically Imperilled) & G2 (Imperilled)

- Critically Imperilled – At very high risk of extinction or elimination due to very restricted range, very few populations or occurrences, very steep declines, very severe threats, or other factors.

- Imperilled – At high risk of extinction or elimination due to restricted range, few populations or occurrences, steep declines, severe threats, or other factors.

NatureServe and state Natural Heritage Programs contain the most up to date information regarding G1 & G2 species. In the supply base area most of these species are associated with streams and other water features.

Mitigation measure:

Enviva's entire supply base for all primary and secondary sourcing has been compared to the areas of "specified risk" identified in the US CW NRA to determine the risk that are pertinent to our operations. Not all risk areas are equally impacted across the supply base. Appropriate mitigation levels have been determined by using a mitigation level matrix and considering the specific sourcing impacts of each Enviva facility. In cases where multiple facilities overlap specified risk areas, increased mitigation will be provided. Enviva sources secondary residual feedstocks that result in expanded supply bases that extend well beyond a traditional hauling radius. A detailed analysis of mitigation requirements has been developed for those sources.

Enviva is committed to only source wood from forest where High Conservation Values are not threatened by harvest activities as outlined in the Enviva Responsible Sourcing Policy. This policy is publicly available on the company website and is contained within the Master Wood Purchase Agreement (MWPA) signed by suppliers. Enviva has adopted the High Conservation Value Network Approach (HCVNA) to make sure HCV's not only persist in the landscape, but are enhanced over time. The HCVNA is a globally applicable approach that can be implemented on a variety of landscapes. This approach defines 6 HCV types, but only 4 are applicable to the southeast US.

HCV Network Approach HCV Types	Enviva HCV Policy Focus
1) Species Diversity	Imperiled Species (G1, G2, S1, S2)
2) Landscape Level Ecosystems	Not applicable in the SE U.S.
3) Ecosystems and Habitats	Bottomland Hardwood, Longleaf Pine
4) Ecosystem Services	Water Quality, BMP's
5) Community Needs	Not applicable in the SE U.S.
6) Cultural Values	Native American Sacred Sites

HCV Type 2 (Landscape Level Ecosystems) applies to large and undisturbed landscapes similar to Intact Forest Landscapes as defined by the World Resources Institute (WRI). Any areas in the southeast US meeting this criteria are already under federal protection. HCV Type 5 (Community Needs) describes forest that are solely relied upon for survival of indigenous people groups without assistance from outside resources, and those areas do not exist in the southeast US.

Mitigation measures for Category 3 High Conservation Values
To address mitigation of Category 3 High Conservation Values Enviva adopted the High Conservation Value Approach. HCVNA involves 3 steps: identification of the HCV, management of the species or ecosystem, and monitoring to verify the effectiveness of the management practices. For identification of HCV's, Enviva will utilize internally developed mapping data for critically imperilled/imperilled species (G1, G2, S1, and S2), the US Fish and Wildlife Service Wetlands Mapper for bottomland hardwood, Longleaf Pine mapping data from the Longleaf Alliance, and sacred site mapping provided by Earthworm. Management of identified HCV's within harvest areas will be on a case-by-case basis utilizing in-house forestry expertise. Monitoring

will be conducted through inspections of with the Longleaf Pine assessment plots reviewed by the Longleaf Alliance, and Enviva's BMP assessment process. Based upon monitoring results, management practices will be improved as needed.

After Commodity Managers have collected Track & Trace® data for the prospective harvest location, they will check the tract boundary in ArcGIS. All the mapped HCV data layers will be available in ArcGIS and the Commodity Manager will compare the harvest area with the map layers to see if overlap exist. If a stand overlaps an HCV Area, there are a series of due diligence workflows in place to guide harvest and management guidelines. Site visits, harvest options, and secondary triggers are all part of these workflows. The Bottomland Hardwood Workflow ultimately requires executive approval for harvest, but the other workflows do not since they are based on conservation community recommendations.

Outreach and Education
Enviva requires all primary suppliers to complete an online course titled Enviva Responsible Sourcing Guidance for Suppliers. The training covers Enviva's commitment to protecting HCV areas of concern – Enviva does not harvest or source from areas of special concern that we have identified in partnership with leading conservation organizations. We use a High Conservation Value (HCV) Network approach to determine and protect HCVs. All tracts are required to undergo a pre-delivery assessment for the presence of HCV features. Those tracts found to contain HCV features must pass through our HCV field assessment and approval process before fiber may be delivered to one of Enviva's facilities. HCVs are:

- Bottomland Hardwoods,
- Low Pocosins,
- Atlantic White Cedar,
- Carolina Bays,
- Cypress Tupelo swamps,
- Longleaf Pine,
- Imperiled Species ,
- Cultural HCVs.

The goal of the HCV Network Approach is to identify areas of exceptional value and make sure those HCV's persist on the landscape over time and that they are maintained and / or enhanced by harvest operations.

- Best Management Practices – Suppliers must adhere to state BMPs. To comply with BMPs, Logger Training must be maintained in order to deliver to any Enviva facility. Enviva Procurement and Sustainability Foresters will conduct random site visits on a selection of active and non-active harvests to verify BMP compliance.

- Certification support – Enviva maintains multiple forestry certifications, including the Sustainable Forestry Initiative® (SFI), Forest Stewardship Council® (FSC), Programme for Forest Stewardship (PEFC), and the Sustainable Biomass Program (SBP).

Track & Trace – Track & Trace is a requirement to deliver primary volume to Enviva. Primary volume is considered to be inwoods volumes, including fuel only purchases from tracts. Track & Trace is not required for volumes from mills as residual secondary or tertiary sources, chip mills, wood yards, nor arboricultural volumes.

Commodity Managers are trained to understand what Enviva identifies as an HCV, how to evaluate a potential source tract to determine if there is overlap of potential HCV area and work with suppliers to avoid the HCV area or if harvesting can enhance the HCV then suggest management recommendations to do so.

Secondary and tertiary feedstock suppliers are evaluated through an in-person District of Origin audit. The audit confirms species used, procurement radius or counties, if the supplier has a sustainability policy, level of information collected from supplier regarding origin of wood, certification status, and other pertinent information to determine their understanding of their supply chain. Each mill is evaluated via mapping with known HCV areas. Each supplier is furnished with a map showing HCV overlap and appropriate HCV information.

Procurement Policy
Enviva's Master Wood Purchase Agreement clearly defines Enviva's procurement policies. Enviva requires all suppliers to sign a Master Wood Supply Agreement. The Agreement requires suppliers to abide by forest management activities regulations. Enviva uses contractual language in its Master Wood Purchase Agreement requiring supplier to abide by all relevant laws and regulations and maintain a trained logger status. The contract includes the requirement to avoid the following unacceptable sources wood:

- Illegally harvested wood

- Wood harvested in violation of traditional and civil rights.

- Wood harvested from forests where high conservation values are threatened by management activities.

- Wood harvested from old growth or semi-natural forests being converted to plantations or nonforest use.

- Wood from forests where genetically modified trees are planted.

- Wood in which there was a violation of the ILO Declarations on fundamental principle and rights at work.

Additionally, the document includes Enviva land use change policy clearly describing the company's desire to avoid feedstock produced from land use change tracts

Implement Management Activities & Landowner Incentives
Enviva has been working with The Longleaf Alliance (TLA) to help restore Longleaf pine (LLP) to the southeast. The effort is multi-faceted.

- Landowner outreach through workshops

- Direct payment for Longleaf pine restoration plans through The Longleaf Alliance partner the Sandhill Prescribed Burn Association (SPBA)

- Documenting the restoration of Longleaf pine through feedstock purchasing from tracts that historically where but planted in a different species and the landowner wishes to convert the forest back to Longleaf

- Provide seedings each year to assist landowners in meeting their LLP objectives

BMP Monitoring
Enviva conducts field inspections including forestry BMPs at two stages. All inspections are scored and the score used to identify poor performers or areas where a supplier could improve

- Ongoing site inspection – to engage with suppliers while on-site to prevent potential BMP infractions

- Post-harvest site inspections – to ensure Enviva agrees the harvest site was properly closed out

Monitoring and outcomes:
Outreach and Education 1. Ensure Enviva primary suppliers complete and sign annual supplier education materials 2. Ensure Enviva Commodity Managers and Stumpage staff understand and sign annual education materials 3. Ensure forestry BMPs are properly applied through field inspections 4. Ensure secondary and tertiary suppliers complete their DOO audit and conform to Enviva's HCV policy Procurement Policy 1. Ensure suppliers have signed an MWPA or similar document demonstrating they understand the procurement policy details pertaining to HCVs, BMPs and/or Track & Trace/DOO as appropriate 2. Monitor supplier trained logger status 3. Monitor via tract set up, remote sensing, and field inspections Implement Management Activities & Landowner Incentives 1. Continue working with TLA to 2. Hold landowner workshops 3. Track the number of landowners receiving LLP restoration plans through the SPBA 4. Track the conversion of other pine forest types to LLP 5. Provide LLP seedlings to landowners assisting them in meeting their LLP restoration objectives BMP Monitoring 1. Ensure Commodity Managers and stumpage staff complete the necessary field inspections 2. Where necessary work with suppliers to improve their BMP score

Country: United States	
Area/sub-scope: Southeast and eastern southcentral	
Risk Assessment used:	
	☐SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☒SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed

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Indicator with specified risk:	
3.1.1 LULUCF emissions shall be accounted for through one of the following routes: Route A Feedstock may be sourced from a country of origin which is party to the Paris Agreement, and which has submitted a Nationally Determined Contribution to the United Nations Framework Convention on Climate Change (UNFCCC) covering carbon emissions and removals from agriculture, forestry and land use which ensure the changes in carbon stock associated with biomass harvest are counted towards the country's commitment to reduce or limit greenhouse gas emissions, or Route B Feedstock may be sourced from a country of origin which is party to the Paris Agreement and has national or sub-national laws in place (developed in accordance with Article 5 of the Paris Agreement and applicable in the area of harvest), to conserve and enhance carbon stocks and sinks, and provided there is evidence that reported LULUCF-sector emissions do not exceed removals, or Route C Feedstock may be sourced from a Supply Base where an assessment demonstrates that both the carbon stock is stable, and the forests' capacity to act as a carbon sink is stable or increasing over the long term.	
Description of the specific risk:	
See ENV-SBP-15 Enviva RED III Level B Assessment	
Mitigation measure:	
As indicated in Indicator 3.2.1., analysis of carbon stocks for the RRA geography are consistently stable or increasing, for decades, supporting the stable or increasing capacity of the forests to act as a sink. This analysis finds that, across the region, an increase of aboveground live carbon stocks of 22.37% since 2008 was observed, from approximately 4.7 to 5.7 billion tonne (Table 3.2.1.-1). Carbon stocks increased as little as 5.81% in Texas to as high as 66.10% in Oklahoma. Carbon stocks increased at a greater rate on public lands compared to private lands, with an increase of 38.95% and 21.09%, respectively (Table 3.2.1.-2).	
Monitoring and outcomes:	
Enviva will continue to monitor our supply base area to ensure our sourcing practices do not have a negative impact on LULUCF emission.	

Country: United States	
Area/sub-scope: Southeast and eastern southcentral	
Risk Assessment used:	
	☐SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☒SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed

	☐SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
3.1.1 LULUCF emissions shall be accounted for through one of the following routes: Route A Feedstock may be sourced from a country of origin which is party to the Paris Agreement, and which has submitted a Nationally Determined Contribution to the United Nations Framework Convention on Climate Change (UNFCCC) covering carbon emissions and removals from agriculture, forestry and land use which ensure the changes in carbon stock associated with biomass harvest are counted towards the country's commitment to reduce or limit greenhouse gas emissions, or Route B Feedstock may be sourced from a country of origin which is party to the Paris Agreement and has national or sub-national laws in place (developed in accordance with Article 5 of the Paris Agreement and applicable in the area of harvest), to conserve and enhance carbon stocks and sinks, and provided there is evidence that reported LULUCF-sector emissions do not exceed removals, or Route C Feedstock may be sourced from a Supply Base where an assessment demonstrates that both the carbon stock is stable, and the forests' capacity to act as a carbon sink is stable or increasing over the long term.	
Description of the specific risk:	
See ENV-SBP-15 Enviva RED III Level B Assessment	
Mitigation measure:	
As indicated in Indicator 3.2.1., analysis of carbon stocks for the RRA geography are consistently stable or increasing, for decades, supporting the stable or increasing capacity of the forests to act as a sink. This analysis finds that, across the region, an increase of aboveground live carbon stocks of 22.37% since 2008 was observed, from approximately 4.7 to 5.7 billion tonne (Table 3.2.1.-1). Carbon stocks increased as little as 5.81% in Texas to as high as 66.10% in Oklahoma. Carbon stocks increased at a greater rate on public lands compared to private lands, with an increase of 38.95% and 21.09%, respectively (Table 3.2.1.-2).	
Monitoring and outcomes:	
Enviva will continue to monitor our supply base area to ensure our sourcing practices do not have a negative impact on LULUCF emission.	

4 Stakeholder engagement

4.1 General description

Biomass Producer's stakeholder engagement start date: 12 May 2026

Biomass Producer's stakeholder engagement end date: 11 Jun 2026

Total number of stakeholders contacted: 89

Give a general description of the process of Stakeholders Engagement, including stakeholders contacted, method of communication and a summary of the comments received:

Enviva conducted a stakeholder consultation to the risk mitigation measures adopted from the RRA. Participants were invited via email to review and comment on the adopted measures using a survey link. Stakeholders are listed below. No Comments were received.

1000 Friends of Florida	GA SAF	Sandhill Prescribed Burn Association
AL Forestry Assoc	GA TNC	Sapp's Land Clearing & Excavation
AL Forestry Commission	GA Wildlife Fed	SC Forestry Association
AL SAF	Homan Industries	SC Forestry Commission
AL TNC	Inter Tribal Timber Council	SELC
AL Wildlife Fed	Interfor	St. Johns River WMD
Applichicola River Keepers	James R. Fincher Timber Co.	Swain & Temple, Inc.
Audubon Florida	LA Forestry Commission	TN DOF
Barge Forest Products	LA TNC	TN Forestry Assoc
Calhoun Timber Co	LA Wildlife Fed	TN TNC
Desoto Pole & Piling	Longleaf Alliance	United South and Eastern Tribes Inc.
Dogwood	Mid-South Woodland Owners Assoc	University of Florida
Ducks Unlimited	MS Band of Choctaw Indians	University of Georgia
Duke University	MS Forestry Assoc (2)	VA Dept of Forestry
Earthworm	MS Forestry Commission (2)	VA Forestry Assoc
U.S. Endowment	MS SAF	VA SAF
Federation of Southern Cooperatives	MS TNC	VA TNC
FL Forest Service	MSU Extension Service	Weyerhaeuser
FL Forestry Association	National Association of State Foresters	Whitfield Timber Company
FL SAF	NC Forest Service	Wildlife Mississippi
FL TNC	NC Forestry Association	WWF
Forest Investment Associates	NC SAF	Dovetail
Forest Landowners Assoc	NC TNC	New March Strategies

Forest Stewards Guild	NCASI	SCS Global (4)
Franklin Lumber	NRDC	American Intustrial Partners (2)
GA Forestry Association	Pinchot	Global Cellulose Fibers (3)
GA Forestry Commission (2)	Rex Lumber	

4.2 Response to stakeholder comments

5 Report updates and approval

This document is: New Supply Base Report (Assessments/reassessments)

Summary of changes: N/A

Name	Shivani Patel
Title	Report author
Date of report approval	22 Jun 2026

Name	Don Grant
Title	Management representative
Date of report approval	22 Jun 2026

Annex 1: Detailed findings for Supply Base Evaluation indicators

United States -	Indicator
1.1.1	Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.
Supply Base Verifiers	Enviva conducted a risk assessment of federal and state laws and regulations and determined there is a sufficient and enforced legal structure in place to ensure feedstock sourcing and Enviva operations comply. • Lacey Act • Worldwide Governance Indicators • Court records of civil and criminal cases related to forestry violations • US Environmental Protection Agency records • US Fish and Wildlife Service records • State Environmental Agencies Documentation • US Department of Labor enforcement records • Sustainable Forestry Initiative Certification Records • FSC US Controlled Wood National Risk Assessment (FSC US CWNRA) • SBP Regional Assessment for US Private Forests – (SBP RRA US)
Risk Rating justification	FSC US CWNRA: Land tenure and management rights finds the US legality of ownership to be a low risk citing landownership records in the US are highly reliable and frequently used by banking institutions to issue mortgages generally requiring title clearances. SBP RRA US Risk conclusion and justification Given well-established laws pertaining to illegal harvesting and trade, the strong record of enforcement, the conclusions of other, widely accepted analyses include the FSC US NRA, and direct feedback from stakeholders and experts, there is a well-supported conclusion of low or negligible risk that feedstock sourcing for biomass does complies with all relevant laws within the RRA's geography. According to the World Bank Worldwide Governance indicators the US consistently ranks high in Regulatory Quality and in Rule of Law. Evidence of the effectiveness of law enforcement is evident in news reporting and reveals

	no widespread or systematic abuse of traditional or civil rights in the Enviva supply base area. Enviva operates within the confines of the US legal system including but not limited to environmental, social and employment laws and regulations. Third party audits of Enviva processes find the company to be in conformance. Enviva's Master Wood Purchase Agreements contain recital requiring the supplier to agree to abide by Enviva's legal and sustainability commitments including a provision to allow Enviva to periodically audit suppliers to ensure conformance. Enviva will only purchase feedstock from suppliers with an established business relationship and a signed agreement. Enviva's Responsible Sourcing Policy publicly describes Enviva's commitment legal operations. SFI Fiber Sourcing Standard Objective 4 requires a certificate holder to comply with all applicable federal, provincial and local laws and regulations. The risk rating justification includes Trees Outside of Forests.
Risk Rating	Low Risk

United States -	**Indicator**
1.1.2	Legal ownership of land and resource use rights shall be respected.
Supply Base Verifiers	Enviva conducted a risk assessment of federal and state laws and regulations and determined there is a sufficient and enforced legal structure in place to ensure feedstock sourcing and Enviva operations comply. Some examples United States — US Consititution Fifth Amendment - Private ownership Alabama — Code Title 35 Property Arkansas — Code Title 18 Property Florida — Code XL- Real and Personal Property Georgia — Code Title 44 - Property Kentucky — Chapter 381 - Title to property and restrictions on use, ownership and alienation Louisiana — Statute Title 9 - Civil Code-Ancilliary Chapter 3 Louisiana Militatry Powers of Attorn Mississippi — Code Title 89 Real and Personal Property Missouri — Statute Title XXIX Ownership and Conveyance or Property North Carolina — Statute Chapter 47B Real Property Marketabe Title Act South Carolina — Code Title 27 Property and Conveyances Tennessee — Code Title 66 Property Virginia — Code Title 55.1 Property and Conveyances West Virginia — Code Chapter 37 Real Property • Worldwide Governance Indicators • FSC US Controlled Wood National Risk Assessment (FSC US CWNRA)

	• SBP Regional Assessment for US Private Forests – (SBP RRA US)
Risk Rating justification	The Fifth Amendment of the US constitution states no person shall be deprived of property without due process of law establishing the five basic property rights; to hold, control, use, dispose of and exclude others from their property. FSC US CWNRA: Land tenure and management rights finds the US legality of ownership to be a low risk citing landownership records in the US are highly reliable and frequently used by banking institutions to issue mortgages generally requiring title clearances. An American Hardwood Export Council Report (2019) determined the same as FSC US CWNRA meaning a low risk for illegality of source including violations of tenure rights SBP RRA US Given well-established laws pertaining to land use and resource rights, strong track record of enforcement, the conclusions of other, widely accepted analyses including the FSC US NRA and the AHEC 2019 study, and direct feedback from stakeholders and experts, there is a well-supported conclusion of low risk that legal ownership of land and resource use rights are not respected within the RRA's geography. According to the World Bank Worldwide Governance indicators the US consistently ranks high in Regulatory Quality and in Rule of Law. Evidence of the effectiveness of law enforcement is evident in news reporting and reveals no widespread or systematic abuse of traditional or civil rights in the Enviva supply base area. Additional evidence Enviva Responsible Sourcing Policy, Section 2 Respect for Human Rights "Enviva has a strong commitment to ethical business practices and is committed to treating people with dignity, respect, and equal opportunity. We expect the same commitment from our suppliers. All suppliers are required to comply with our expectations regarding human rights and labor, health and safety, and business conduct and ethics. In keeping with our supply-chain sustainability certifications, Enviva holds our suppliers accountable to the International Labour Organization Declaration on Fundamental Principles and Rights at Work and the United Nations Declaration on the Rights of Indigenous Peoples. Enviva also respects the rights of Indigenous Peoples and communities to the ownership and control of their titled or customary lands, including their right to give or withhold their free, prior and informed consent (FPIC) to proposed developments on their lands." Enviva's Master Wood Purchase Agreements contain recitals requiring the supplier to agree to abide by Enviva's legal and sustainability commitments including a provision to allow Enviva to periodically audit suppliers to ensure

	conformance. Enviva will only purchase feedstock from suppliers with an established business relationship and a signed agreement. The Master Wood Purchase Agreement has among its many recitals requirements for feedstock supplier to ensure legality of ownership. The risk rating justification includes Trees Outside of Forests.
Risk Rating	Low Risk

United States -	**Indicator**
1.1.3	Feedstock shall be legally harvested, supplied and produced, including in compliance with CITES, EUTR and other applicable legal trade requirements.
Supply Base Verifiers	Enviva conducted a risk assessment of federal and state laws and regulations and determined there is a sufficient and enforced legal structure in place to ensure feedstock sourcing and Enviva operations comply. • Lacey Act • Convention on International Trade in Endangered Species • Federal Laws • State Forestry Laws • FSC US Controlled Wood National Risk Assessment (FSC US CWNRA) • SBP Regional Assessment for US Private Forests – (SBP RRA US)
Risk Rating justification	FSC US CWNRA 1.2 Concessions on licenses determined a low-risk rating in the US for legality of harvest in determining, “On the whole, the risk of illegality in entering into contracts, public or private, is real, but is considered low.” 1.4 Harvesting permits – “Corruption associated with timber sales and harvesting permits in the US is generally not an issue.” 1.19 Customs regulations – The Lacey Act and other US code and enforcement find there is a low risk of a US company purchasing species listed by CITES. 1.20 CITES finds no tree species with commercial timber value is listed on the CITES Appendices determining the there is a low risk of sourcing CITES species in North America. 1.21 Legislation requiring due diligence/due care procedures cites the Lacey Act as the legislation that prohibits the importation of illegally sourced wood into the US.

	Some additional sources of evidence include: • https://www.aphis.usda.gov/sites/default/files/2023-annual-report-laceyact.pdf – USDA 2023 Annual Report The Lacey Act: Combating the Illegal Trade of Protected Plant Species • www.transparency.org – ranks the United States 24th on its Corruption Perceptions Index 2023 out of the 180 countries indicating a low risk of corruption. SBP RRA US Given well-established laws pertaining to legally harvested, supplied, and produced feedstock, a strong track record of enforcement, and the conclusions of other, widely accepted analyses, along with direct feedback from stakeholders and experts, there is a well-supported conclusion of low risk that feedstock sourcing for biomass does not comply with all applicable trade regulations within the RRA's geography. Additional evidence Enviva's Responsible Sourcing Policy publicly describes Enviva's commitment to avoid illegal sources of wood. "Enviva's employees, suppliers, and subcontractors comply with all applicable federal, state, and local laws and regulations, including those pertaining to harvesting and exporting, environmental standards, and employment conditions. All Enviva contracts with suppliers require that wood is legally logged. At Enviva, we understand that legality is only a first step to ensure responsible harvesting; therefore, we have additional policy criteria that go above and beyond legal requirements." The risk rating justification includes Trees Outside of Forests.
Risk Rating	Low Risk

United States -	**Indicator**
1.1.4	Payments for harvest rights and feedstock, including duties, relevant royalties and taxes related to timber harvesting shall be complete and up-to-date.
Supply Base Verifiers	Enviva conducted a risk assessment of federal and state laws and regulations and determined there is a sufficient and enforced legal structure in place to ensure feedstock sourcing and Enviva operations comply. Some examples

	United States — Federal Timber Tax Code Alabama — Code Title 9 Chapter 13 Article 4 Forest Products Priveledge and Severence Tax Arkansas — Code Title 26 Taxation Subtitle 5 State Taxes Chapter 58 Severance Tax Florida — Florida does not have a timber or timber products tax structure Georgia — Code Title 48 - Revenue and Taxation Kentucky — Kentucky does not have a timber or timber products tax structure Louisiana — Statute 47 Revenue and Taxation Chapter 6 Taxes on Natural Resources. Mississippi — Code Title 27 Taxation and Finance Article 1 Timber and Timber Products Missouri — Missouri does not have a timber or timber products tax structure North Carolina — Chapter 106 Article 84 Primary Forest Product Assessment Act South Carolina — Code title 48 Environmental Protection and Conservation Chapter 30 Primary Forest Product Assess Tennessee — Tennessee does not have a timber or timber products tax structure Virginia — Code title 58.1 taxation Chapter 16 Forest Products Tax West Virginia — West Virginia does not have a timber or timber products tax structure • Federal and State Laws • Transparency International • World Bank Worldwide Governance Indicators • AHEC Legality Study • Sustainable Forestry Initiative Certification Records • FSC US Controlled Wood National Risk Assessment (FSC US CWNRA) • SBP Regional Assessment for US Private Forests – (SBP RRA US)
Risk Rating justification	FSC US CWNRA indicators: 1.5 Payment of royalties and harvesting fees there is no evidence of efforts to avoid payment and determined a low-risk rating. 1.6 Value added taxes and other sales taxes finds a low risk of tax avoidance. 1.7 Income and profit taxes concluded there is a low risk these taxes are not paid citing income and profit taxes are levied and managed at the federal and state level. SBP RRA US Given well-established laws pertaining to payments for harvest rights and feedstock, strong track record of enforcement, and the conclusions of other, widely accepted analyses, along with direct feedback from stakeholders and experts, there is a well-supported conclusion of low risk that feedstock sourcing for biomass does not comply with all relevant laws within the RRA's geography, including those related to the payment of required duties, taxes and royalties. The Transparency International Coalition ranks the United States 24th on its Corruption Perceptions Index 2022 out of the 180 countries indicating a low risk of corruption. (2022 Corruption Perceptions Index: Explore the… -

	Transparency.org) AHEC Legality Study determined the region Enviva supply base area is located is a low risk for illegal activity. According to the World Bank Worldwide Governance indicators the US consistently ranks high in Regulatory Quality and in Rule of Law. Evidence of the effectiveness of law enforcement is evident in news reporting and reveals no widespread or systematic abuse of traditional or civil rights in the Enviva supply base area. The Transparency International Coalition ranks the United States 24th on its Corruption Perceptions Index 2023 out of the 180 countries indicating a low risk of corruption. (2022 Corruption Perceptions Index: Explore the… - Transparency.org) Enviva's Responsible Sourcing Policy publicly describes Enviva's commitment to require suppliers to ensure all appropriate payments, fees and taxes are paid. "Enviva's employees, suppliers, and subcontractors comply with all applicable federal, state, and local laws and regulations, including those pertaining to harvesting and exporting, environmental standards, and employment conditions. All Enviva contracts with suppliers require that wood is legally logged. At Enviva, we understand that legality is only a first step to ensure responsible harvesting; therefore, we have additional policy criteria that go above and beyond legal requirements." Enviva requires all suppliers to sign a Master Wood Purchase Agreement. Master Wood Purchase Agreements contain language requiring the supplier to agree to abide by Enviva's legal and sustainability commitments including a provision to allow Enviva to periodically audit suppliers to ensure conformance. Enviva will only purchase feedstock from suppliers with whom it has an established business relationship and a signed agreement. Enviva uses contractual language in its Master Wood Purchase Agreement requiring suppliers to abide by all relevant laws and regulations, including payment of necessary taxes, royalties, etc. SFI Fiber Sourcing Standard Objective 4 requires a certificate holder to comply with all applicable federal, state, provincial, and local laws, and regulations. Performance Measure 4.1 requires program participants have methods to access relevant laws, systems to achieve compliance, and commitments to legal compliance. ENV-SFIS-01 Certified Sourcing Implementation Manual describes processes and internal documents Enviva uses to meet the Objective. In certain state wood consuming mills are required to pay severance taxes on the wood used for manufacturing. These internal records are used to show Enviva's compliance

	with state requirements. The risk rating justification includes Trees Outside of Forests.
Risk Rating	Low Risk

United States -	**Indicator**
2.2.1	Feedstock shall not be sourced from land that had one of the following statuses in January 2008 and no longer has that status due to land conversion: a. Forests b. Wetlands c. Peatlands d. Highly biodiverse grasslands.
Supply Base Verifiers	Enviva conducted a risk assessment of federal and state laws and regulations and determined there is a sufficient and enforced legal structure in place to ensure feedstock sourcing and Enviva operations comply. The Clean Water Act (CWA) provides protection of wetlands. A sample of laws/regulations United States — Clean Water Act Alabama — Enforcement of Clean Water Act Arkansas — Non-regulatory program Multi-agency Wetland Planning Team Florida — Statute Title XXVIII Natural Resources; Conservation, Reclaimation and Use Chapter 373 Water Re Georgia — Regulation Department 391 Rules of Georgia Department of Natural Resources Chapter 391-3 Environmental Protection Subject 391-3-16 Rules for Environmental Planning Criteria Rule 391-3- Criteria for Wetlands Protection Kentucky — Enforcement of Clean Water Act Louisiana — US Code Title 16 Conservation Chapter 59A Wetlands Mississippi — Code Title 49 Chapter 27 Coastal Wetlands Protection Act Missouri — Executive Order 96-03 North Carolina — Enforcement of Clean Water Act South Carolina — Enforcement of Clean Water Act Tennessee — Code Title 69 Waters, Waterways, Drains and Levees Chapter 3 Water Pollution Control Part 1 Wa Quality Control Act Virginia — Code Title 62.1 Waters of the State, Ports and Harbors Chapter 3.1 State Water Control Section 62.1 Virginia Water Protection Act West Virginia — Enforcement of Clean Water Act • World Bank Worldwide Governance Indicators • FSC US Controlled Wood National Risk Assessment (FSC US CWNRA) • SBP Regional Assessment for US Private Forests – (SBP RRA US)
Risk Rating justification	FSC US CWNRA Conversion: The FSC US CWNRA definition of conversion does not align with the SBP focusing on population growth and the issuance of building permits; focusing on urban development. The SBP definition for conversion is much broader, “The process of changing or causing to change from one form to another”. Though we recognize the identification of counties conducted under the FSC process, Enviva’s approach is more stringent, we avoid harvests where the forest will not be regenerated into a new forest.”

	SBP RRA US Forests “For (a) forests, according to all sources reviewed, the overall rate of deforestation is quite low at the scale of the US, as whole, and the US Southeast, in which the RRA geography is situated. Similarly, there is consensus that forest harvesting is not a driver of forest loss, and neither is expansion of agriculture. Deforestation is driven by population growth and commercial or residential development.” And “While there is an array of relevant laws for lands owned by the State and Federal governments, there is no specific legal Federal framework that governs the conversion of private forests, outside of forested wetlands.” Wetlands “For (b) wetlands, land use history and the impact of legislation was evaluated. The US Clean Water Act (CWA) is the dominant Federal regulatory mechanism for protection of wetlands, which is further articulated at the State level through the implementation of Best Management Practices (BMPs). Specifically, Section 404 of the CWA regulates the discharge of dredged or fill material and specifies activities must not convert wetlands to uplands and/or new uses (EPA, 2020). The rigorous and longstanding enforcement of the CWA suggests conversion of any wetland to dried alternative ecosystems is likely to have occurred before its enactment in 1972, and well before the 2008 cut off specified by the SBP requirements.” Peatlands “Within the geographic scope of the RRA, peatlands tend to be associated with histosol soils, which meet SBP’s definition for peatland (areas with soils containing at least a 40cm deep layer of peaty material in the first 80cm of the soil). According to the USDA Illustrated Guide to Soil Taxonomy V2.0, 2015, “histosols are formed in thick accumulations of organic matter from decaying plant material. The organic-dominated layers are typically at least 40 cm thick and commonly much thicker.” As such, this definition for wetlands. Further, review of the literature and consultation with experts confirmed that peatlands are terrestrial wetland ecosystems. As a subset of wetlands, the analyses completed for 3.2.1 would apply to peatlands (USFWS, 1979). This analysis yields a net increase in wetlands of 1.18% across the RRA’s geography and no losses were reported for any of the States with the RRA’s geography. As such, risk of sourcing feedstock from forests displacing wetlands in 2008 is low.” Highly Biodiverse Grasslands “According to experts consulted, the definition provided Sustainable Biomass Partnership (SBP) and European Union (EU) legislation is not well suited to the grasslands in the US. There is consensus across all reviewed sources and experts, that intact, biodiverse grasslands are extremely rare within the RRA’s geography and have been for over 100 years. Intact, natural, native,

	highly biodiverse grasslands, as described in part i. of the SBP/EU definition are estimated to remain at 1-5% of historical pre-European colonial levels and have been stable at these levels for more than 100 years, as this conversion occurred before the US Civil War (1861) (Estes, 2024; Estes etal, 2016; Murray, 2024; Muir, 2024). As such, the likelihood of sourcing feedstock from highly biodiverse grasslands in 2008 is extremely low." The risk rating justification includes Trees Outside of Forests.
Risk Rating	Low Risk

United States -	**Indicator**
2.2.6	Air emissions shall comply with national legislation or in the absence of national legislation with industry best practice.
Supply Base Verifiers	Enviva conducted a risk assessment of federal and state laws and regulations and determined there is a sufficient and enforced legal structure in place to ensure feedstock sourcing and Enviva operations comply. Each state in the supply base area has laws addressing air quality. Some examples are below.

Jurisdiction	Law/Code/Regulation/Statute
United States	Code Title 42 The Public Health and Welfare Chapter 85 Air Pollution Prevention and Control
Alabama	Code Title 22 Health, Mental Health and Environmental Control Title 1 Health and Environmental Control Generally Chapter 28 Alabama Air Polution Control Act
Arkansas	Code Title 8 Environmental Law Chapter 4 Arkansas Water and Air Pollution Control Act Chapter 3 Air Pollution
Florida	Statute Title XXIX Public Health Chapter 403 Environmental Control Part 1 Pollution Control
Georgia	Code Title 12 Conservation and Natural Resources Chapter 9 Prevention and Control of Air
Kentucky	Statute Chapter 224 Environmental Protection Subchapter 224.20 Air Quality
Louisiana	Statute Title 30 Minerals, Oil, Gas and Environmental Quality Chapter 3 Louisiana Air Control Law
Mississippi	Code Title 49 Conservation and Ecology Chapter 17 Pollution of Waters, Streams and Air
Missouri	Statute Title XL additional Executive Departments Chapter 643 Air Conservation
North Carolina	Statute Chapter 143 State Department, Insititutions and Commissions Article 21 B Air Pollution Control
South Carolina	Statute Title 48 Environmental Protection and Conservation Chapter 1 Pollution Control Act
Tennessee	Code Title 68 Health, Safety and Environmental Protection Chapter 201 Tennessee Air Quality Act
Virginia	Code Title 10.0 Conservation Chapter 11.1 Department of Environmental Quality Section 10.1-1184 Stat pollution Control Board, State Water Control Board and Virginia Waste Management Board continued
West Virginia	Code Chapter 22 Environmental Resources Article 5 Air Pollution Control

- Federal and State laws
- United States Fire Administration
- Federal Insecticide, Fungicide and Rodenticide Act
- United States Clean Air Act
- Environmental Protection Agency
- SBP Regional Assessment for US Private Forests – (SBP RRA US)

Risk Rating justification	Air quality impacts from forest management activities are generally related to prescribe fire site preparation techniques. The US Clean Air Act requires

	each state to implement air quality controls to ensure the public's safety. The USDA Forest Service website, Forest Service Air Management Responsibilities, describes how the Clean Air Act affects forestry operations in general. States in the Enviva supply base area have haze/smoke laws that are enforced at the local level. Examples of enforcement of forestry fire laws can be found on the United States Fire Administration website (https://www.usfa.fema.gov/prevention/outreach/wildfire_arson/court_cases.html). And the US Environmental Protection Agency website (https://cfpub.epa.gov/compliance/criminal_prosecution/). Air quality can also be affected by the forest management use of herbicides and pesticides to control unwanted vegetation and insects. Though each state has varying guidance for herbicide and pesticide use, all use of these chemicals is regulated by the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). FIFRA is a federal statute that governs the registration, distribution, sale, and use of pesticides in the United States. With certain exceptions, a pesticide is any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest, or intended for use as a plant regulator, defoliant, or desiccant, or any nitrogen stabilizer. Enviva is certified to multiple certification systems including SFI Fiber Sourcing and FSC Chain of custody and Controlled Wood. Further, Enviva's Master Wood Purchasing Agreement requires suppliers to abide by laws relevant to the forest industry. Further the agreement details Enviva's requirements for our suppliers to support our third-party certifications and abide by our sustainability policies. As we describe in our Responsible Sourcing Policy. "We will monitor suppliers' performance to ensure that we are making measurable, timely progress on implementing the policy criteria. Suppliers failing to meet our time-bound requirements will go through a review process and may be subject to non-renewal or termination of contracts. The policy criteria will increasingly be included in our supplier selection and evaluation process." SBP RRA US "On the foundation of a comprehensive set of Federal and State laws, which are rigorously enforced, air emissions from forestry operations connected to feedstock sourcing comply with applicable legislation. In fact, there is no evidence of significant emissions from such operations. Therefore, a low-risk designation is assigned for this indicator for all forests within the scope of the assessment." The risk rating justification includes Trees Outside of Forests.
Risk Rating	Low Risk

<table>
<tr><th>United States
-</th><th>Indicator</th></tr>
<tr><td>2.2.8</td><td>Waste shall be disposed of in an environmentally appropriate manner.</td></tr>
<tr><td>Supply Base Verifiers</td><td>Enviva conducted a risk assessment of federal and state laws and regulations and determined there is a sufficient and enforced legal structure in place to ensure feedstock sourcing and Enviva operations comply. Each state in the supply base area has laws addressing waste management. Some examples below.

<table>
<tr><th>Jurisdiction</th><th>Law/Code/Regulation/Statute</th></tr>
<tr><td>United States</td><td>Code Title 42 The Public Health and Welfare Chapter 82 Solid Waste Disposal</td></tr>
<tr><td>Alabama</td><td>Code Title 13A Criminal Code Chapter 7 Offenses Involving Damage to and Intrusion Upon Property
Article 2 Criminal Damage to Property Section 13A-7-29 Criminal Littering</td></tr>
<tr><td>Arkansas</td><td>Code Title 8 Environmental Law Chapter 6 Disposal of Solid Wastes and Other Refuse</td></tr>
<tr><td>Florida</td><td>Title XXVIII Natural Resources; Conservation, Reclaimation and Use Chapter 376 Pollutant Discharge
Prevention and Removal</td></tr>
<tr><td>Georgia</td><td>Title 16 Crimes and Offenses Chapter 7 Damage and Intrusion Upon Property Article 2 Criminal Trespass
and Damage to Property Part 2 Littering Public and Private Property and Part 3 Waste Contro</td></tr>
<tr><td>Kentucky</td><td>Statute Chapter 224
Subchapter 224.40 Waste - Generalities
Subchapter 224.43 Solid Waste
Subchapter 224.46 Hazardous Waste
Subchapter 224.50 Other Specific Types of Waste</td></tr>
<tr><td>Louisiana</td><td>Chapter 8 Louisiana Solid Waste Management
Chapter 9 Hazardous Waste
Chapter 13 Louisiana Waste Reduction Law
Chapter 21 Statewide Beautification Part I Louisiana Litter Violations and Penalties</td></tr>
<tr><td>Mississippi</td><td>Code Title97 crimes Chapter 15 Offences Affecting Highways, Ferries and Waterways
Section 97-15-29 Littering highways and private property with trash or substance likely to cause a fire;
civil penalty; fines; disposition of records
Section 97-15-30 Penalties for unauthroized dumping of solid wastes; commercial purpose defined.</td></tr>
<tr><td>Missouri</td><td>Statute Title XXXVIII Crimes and Punishment; Peace Officers and Public Defenders Chapter 577 Public
Safety Offenses Section 577.070 Littering - penalties</td></tr>
<tr><td>North Carolina</td><td>Staute Chapter 14 Criminal Law Article 52 Micellanious Police Regulatons section 14-399 Littering</td></tr>
<tr><td>South Carolina</td><td>Code Title 16 Crimes and Offenses Chapter 11 Offens Against Property Section 16-11-700 Dumping litter
on private or public property prohibited; exceptions; responsibility for remova; penalties</td></tr>
<tr><td>Tennessee</td><td>Code Title 39 Criminal Offenses Chapter 14 Offenses Against Property Part 5 Litter Control</td></tr>
<tr><td>Virginia</td><td>Code Title 10.1 Conservation Chapter 14 Virginia Waste Management Act
Article 2 Solid Waste Management
Article 3 Litter Control and Recycling</td></tr>
<tr><td>West Virginia</td><td>Code Chapter 22 Environmental Resources
Article 15 Solid Waste Mangement
Article 15A The A James Manchin Rehabilitation Environmental Action Plan</td></tr>
</table>

Federal and State Law
Forestry BMPs
Evidence in Indicator 1.1.1
National Association of State Forester
World Bank Worldwide Governance Indicators
SBP Regional Assessment for US Private Forests – (SBP RRA US)
</td></tr>
<tr><td>Risk Rating justification</td><td>Enviva reviews sources such as the National Association of State Foresters,</td></tr>
</table>

	USFS, NCASI and the Southern Group of State Foresters to conduct a state-by state study of its supply area. The analysis indicates there are ample state and regional forest assessment tools that help determine forestry regulations within the supply base area. The analysis determined the wood products industry is well established, logger training is an industry norm, and the use of forestry best management practices are a long-standing best practice in the supply base area. Enviva is a member of state Sustainable Forestry Initiative committees within its supply base area and these organizations are responsible for reviewing and developing logger training in conjunction with state forestry commissions related to forestry best management practices. Enviva interacts with these groups to improve forestry best management practices guidelines and monitor enforcement. Proper disposal of both oily and non-oily waste is a key component of forestry BMPs. Even in areas not associated with streams or water features forestry BMPs specify howroads, trails and other forest management activities are performed to minimize their impact on the forest. Enviva contractually requires the use of BMPs through the Master Wood Purchase Agreement. BMP Manuals are available online for each state within the supply area. Enviva's Track & Trace Program includes a harvest site auditing component to ensure suppliers conform to the requirement. Further the Forestry Commissions for each state in the supply area monitor and enforce BMP implementation. The National Association of State Forester (NASF) recently released a publication, Protecting the Nation's Water: State Forestry Agencies and Best Management Practices. The publication covers all 50 US States and eight of its territories. The state forestry BMP implementation rates for the supply base area are listed in the NASF publication. "Across the country, BMP's are implemented appropriately, when and where they areneeded, 92% of the time. This is a figure not only one state forestry agency can be proud of: it serves as strong evidence in support of a silvicultural exemption to Clean Water Act permitting requirements". According to the World Bank Worldwide Governance indicators the US consistently ranks high in Regulatory Quality and in Rule of Law. Evidence of the effectiveness of law enforcement is evident in news reporting and reveals no widespread or systematic abuse of traditional or civil rights in the Enviva supply base area. Chemical use and other waste disposal in forest management activities also follow EPA guidance under FIFRA and include in-woods practices. A review of the EPA Civil Cases and Settlements by Statute resulted in no findings

	related to forest management activities. The United States has a robust legal system that deters the abuse of state and federal regulation. SBP RRA US “Like many other aspects of forestry operations, waste disposal is regulated by a stringent and robust set of federal and state BMPs. As a mature industry in the region, companies have a set of tools beyond laws to help ensure compliance.” The risk rating justification includes Trees Outside of Forests.
Risk Rating	Low Risk

United States -	**Indicator**
3.1.1	LULUCF emissions shall be accounted for through one of the following routes: Route A Feedstock may be sourced from a country of origin which is party to the Paris Agreement, and which has submitted a Nationally Determined Contribution to the United Nations Framework Convention on Climate Change (UNFCCC) covering carbon emissions and removals from agriculture, forestry and land use which ensure the changes in carbon stock associated with biomass harvest are counted towards the country’s commitment to reduce or limit greenhouse gas emissions, or Route B Feedstock may be sourced from a country of origin which is party to the Paris Agreement and has national or sub-national laws in place (developed in accordance with Article 5 of the Paris Agreement and applicable in the area of harvest), to conserve and enhance carbon stocks and sinks, and provided there is evidence that reported LULUCF-sector emissions do not exceed removals, or Route C Feedstock may be sourced from a Supply Base where an assessment demonstrates that both the carbon stock is stable, and the forests’ capacity to act as a carbon sink is stable or increasing over the long term.
Supply Base Verifiers	• SBP REDII Level A risk assessment for Art 29-7 LULUCF v1.3 12Sep24 • United States Nationally Determined Contribution (NDC) • ENV-SBP-15 Enviva RED III Level B Assessment • SBP Regional Assessment for US Private Forests – (SBP RRA US)
Risk Rating justification	Analysis of carbon stocks for the RRA geography are consistently stable or increasing, for decades, supporting the stable or increasing capacity of the forests to act as a sink. This analysis finds that, across the region, an increase of aboveground live carbon stocks of 22.37% since 2008 was observed, from approximately 4.7 to 5.7 billion tonne. Carbon stocks increased as little as 5.81% in Texas to as high as 66.10% in Oklahoma. Carbon stocks increased at a greater rate on public lands compared to private lands, with an increase of 38.95% and 21.09%, respectively.

Risk Rating	Low Risk

United States -	Indicator
4.1.1	Freedom of association and the right to collective bargaining shall be respected in the workplace.
Supply Base Verifiers	Enviva conducted a risk assessment of federal and state laws and regulations and determined there is a sufficient and enforced legal structure in place to ensure feedstock sourcing and Enviva operations comply. Each state in the supply base area has laws addressing rights to associate and collective bargaining. Some examples below.

Jurisdiction	Law/Code/Regulation/Statute
United States	Code Title 29 Labor Chapter 7 Labor-Management Relations Sub-chapter 2 National L Relations CFR 29 Labor Subtitle B Regulations Related to Labor Chapter 1 National Labor Relati
Alabama	Code Title 25 Industrial Relations and Labor Chapter 7 Labour Unions and Labor Rela AL CONST Amend. No. 913
Arkansas	Code Title 11 Labor and Industrial Relations Chapter 3 Labor Relations and Practicie Right to Work
Florida	Statute Title XXXI Labor Chapter 447Labor Organizations Part I General Provisions 44 Employee's Right of Self-organization
Georgia	Code Title 34 Labor and Industrial Relations Chapter 6 Labor Organizations and Labo
Kentucky	Title XXVII Labor and Human Rights Statute Chapter 336 Labor and empoyment 336.1 may organize, bargain collectively, strike, picket - Effect of violence or injury to perso
Louisiana	Worker's Compensation Part V Right to Work Section 23.981 Declaration of public po
Mississippi	Mississippi Constitution Article 7 Section 198A Right to work; labor unions
Missouri	Constitution Article 1 Bill of Rights Section 29 Organized labor and collective bargain
North Carolina	North Carolina follows the rules set forth by the National Labor Relations Board
South Carolina	Code Title 41 Labor and Employment Chapter 7 Right to Work
Tennessee	2022 Tennessee Consitiutional Amendment 1 Right to Work
Virginia	Code Title 40.1 Labor and Employment Chapter 4 Labor Unions, Strikes, Etc Article 3 Denial or Abridgement of Work
West Virginia	Code 21 Labor Article 1A Labor - Management Relations Act for the Private Sector

- Federal and State laws
- World Bank Worldwide Governance Indicator
- International Labor Organization (ILO)
- United States Department of Labor
- SBP Regional Assessment for US Private Forests – (SBP RRA US)

Risk Rating justification	The United States ratified ILO C150 – Labor Administration Convention securing the rights of worker organization and collective bargaining. Verification of this and other ILO US Ratified Conventions can be found on the ILO NORMLEX website

	According to the World Bank Worldwide Governance Indicators the US consistently ranks high in Regulatory Quality and in Rule of Law. Evidence of the effectiveness of law enforcement is evident in news reporting and reveals no widespread or systematic abuse of the right to freely associate or collectively bargain in the Enviva supply base area. The United States Department of Labor provides verification of enforcement. (https://www.dol.gov/general/aboutdol/majorlaws) SBP RRA US “These risk assessments, legal protections, enforcement mechanisms, educational resources, and policy initiatives provide a strong conclusion that the US promotes and protects freedom of association and the right to collective bargaining in the private and public sectors. The Federal laws establish foundational worker protections that empower employees to advocate for their rights without fear of retaliation. Thus, low risk is designated for freedom of association and the right to collective bargaining being disrespected in the workplace.” The risk rating justification includes Trees Outside of Forests.
Risk Rating	Low Risk

United States -	**Indicator**
4.1.2	Forced or compulsory labour shall not be used.
Supply Base Verifiers	Enviva conducted a risk assessment of federal and state laws and regulations and determined there is a sufficient and enforced legal structure in place to ensure feedstock sourcing and Enviva operations comply. Each state in the supply base area has laws addressing compulsory labor issues. • Federal and State laws • World Bank Worldwide Governance Indicator • United States Constitution • United States Code • United States Department of Labor • SBP Regional Assessment for US Private Forests – (SBP RRA US)
Risk Rating justification	According to the World Bank Worldwide Governance Indicators the US consistently ranks high in Regulatory Quality and in Rule of Law. Evidence of

	the effectiveness of law enforcement is evident in news reporting and reveals no widespread or systematic abuse of the right to freely associate or collectively bargain in the Enviva supply base area. US Code 18 Code § 1589 - Forced labour: Whoever knowingly provides or obtain labor by force in the US is subject to be fined under this title, imprisoned not more than 20 years, or both. The United States Department of Labor provides verification of enforcement. (https://www.dol.gov/general/aboutdol/majorlaws) SBP RRA US “These risk assessments, legal protections, enforcement mechanisms, training programs, and policy initiatives provide a strong conclusion that the US has a strong legal framework in place to prevent forced labor and compulsion in this sector. Based on consistent ongoing performance, there is sufficient evidence to designate low risk for this indicator.” The risk rating justification includes Trees Outside of Forests.
Risk Rating	Low Risk

United States -	**Indicator**
4.1.3	Child labour shall not be used.
Supply Base Verifiers	Enviva conducted a risk assessment of federal and state laws and regulations and determined there is a sufficient and enforced legal structure in place to ensure feedstock sourcing and Enviva operations comply. Each state in the supply base area has laws addressing child labour issues. Some examples below.

Jurisdiction	Law/Code/Regulation/Statute
United States	Code Title 29 Labor Chapter 8 Fair Labor Standards Section212 Child labor provisions
Alabama	Code Title 25 Industrial Relations and Labor Chapter 8 Child Labor
Arkansas	Code Title 11 Labor and Industrial Relations Chapter 6 Child Labor
Florida	Statute Title XXXI Labor Chapter 450 Minority Labor Groups Part 1 Child Labor
Georgia	Code Title 39 Minors Chapter 2 Regulation and Employment of Minors
Kentucky	Statute Title XXVII Labor and Human Rights Chapter 339 Child Labor
Louisiana	Statute Title 23 Labor and Worker's Compensation Chapter 3 Employment Standards P
Mississippi	Code Title 71 Labor and Industry Chapter 1 Employer and Employee Sections 71-1-17 -
Missouri	Statute Title XVIII Labor and Industrial Relations Chapter 294 Child Labor
North Carolina	Statute Chpater 95 Department of Labor and Laboir Regulations article 2A Wage and H Section 95-25.5 Youth Employment
South Carolina	Code Title 41 Labor and Employment Chapter 13 Child Labor
Tennessee	Code Title 50 Employer and Employee Chapter 5 Child Labor
Virginia	Code Title 40.1 Labor and Employment Chapter 5 Child Labor
West Virginia	Code Chapter 21 Labor Article 6 Child Labor

- Federal and State laws
- World Bank Worldwide Governance Indicator

	• United States Department of Labor • State level Department of Labor • FSC US Controlled Wood National Risk Assessment (FSC US CWNRA) • SBP Regional Assessment for US Private Forests – (SBP RRA US)
Risk Rating justification	FSC US CWNRA concludes low risk for Category 2: Wood Harvested in violation of Traditional and Human Rights, which includes 2.2. Labour rights are respected, including rights as specified in ILO Fundamental Principles and Rights at work. The FSC CWNRA finds: “The United States ratified Core Convention 182 (Worst Forms of Child Labor Convention) in 1999 and the ILO web site indicates the status as ‘In Force’. The US has not yet ratified Convention 138 (Minimum Age Convention), but as noted above has legislation that addresses fundamental rights associated with child labor. Additionally, every state has legislation that further limits the hours and days per week that minors may work in non-farm employment and 34 states have similar limits for farm work. And all states have compulsory education until at least 16 years of age [28]. The US Annual Reports to the ILO also detail statistics on the effective enforcement of the federal legislation, including hundreds of cases, thousands of children affected and millions of dollars paid in fines each year. The United States does not feature in the ILO Child Labour Country Dashboard, which indicates a low risk for child labour in the United States. The 2016 List of Goods Produced by Child Labor or Forced Labor [46] does not associate any goods produced in the US with child labor.” Further it finds: “While the US has not ratified both relevant Core Conventions, it is still possible to conclude that the US respects the fundamental right to the effective abolition of child labor, particularly in the forest sector.” According to the World Bank Worldwide Governance Indicators the US consistently ranks high in Regulatory Quality and in Rule of Law. Evidence of the effectiveness of law enforcement is evident in news reporting and reveals no widespread or systematic abuse of children’s rights in the workplace in the Enviva supply base area. The United States Department of Labor provides verification of enforcement.

	(https://www.dol.gov/general/topic/youthlabor/enforcement) SBP RRA US “Based upon the established legal frameworks and enforcement mechanisms aimed at preventing child labor in the US, as evidenced by the FLSA, the TVPA, and the enforcement efforts of the DOL, there is sufficient evidence to designate low risk for this indicator regarding the use of child labor in the workplace.” The risk rating justification includes Trees Outside of Forests.
Risk Rating	Low Risk

United States -	**Indicator**
4.1.4	Workers shall not be discriminated in hiring, remuneration, access to training, promotion, termination or retirement.
Supply Base Verifiers	Enviva conducted a risk assessment of federal and state laws and regulations and determined there is a sufficient and enforced legal structure in place to ensure feedstock sourcing and Enviva operations comply. Each state in the supply base area has laws addressing the treatment of workers in the workplace issues. Some examples below.

Jurisdiction	Law/Code/Regulation/Statute
United States	CFR 29 Labor Chapter 14 Equal Employment Opportunity Commission Subtitle B Regulatio Relating to Labor Code Title 29 Labor Chapter 8 Fair Labor Standards
Alabama	Code Title 25 Industrial Relations Chapter 1 General Provisions
Arkansas	Code Title 11 Labor and Industrial Relations Chapter 4 Wage and Hour Regulations Generally Subchapter 6 Wage Discrimination Chapter 3 Labor Relations and Practices Code Title 16 Practice, Procedures and Courts Subtitle 7 Particular Proceedings and Remedies Chapter 123 Civil Rights Act of 1993
Florida	Statute Title XLIV Civil Rights Section 760.01-760.11 and 509.092 Statute Title XXXI Labor Chapter 448 General Labor Reguations Part I Terms and Conditio of Employment
Georgia	Code Title 34 Labor and Industrial Relations Chapter 1 General Provisions Chapter 7 Employment Generally; Employers Liability
Kentucky	Statute Title XXVII Labor and Human Rights Chapter 207 Aid to the needy blind - equal opportunities section Equal Opportunites Act Chapter 344 Civil rights Section Unlawful Discrimination Chapter 337 Wages and hours Section Wage Discrimination Because of Sex
Louisiana	Louisiana Workforce Commission (23.1), Prohibition of age discrimination (23.312), Discrimination (23.323), Intentional discrimination in employment (23.332), Unlawful practi by employers prohibited; pregnancy, childbirth, or related medical condition; benefits and leaves of absence; transfer of position (23.342), Prohibition of sickle cell trait discriminatio (23.352), Louisiana Equal Pay for Women Act (23.661)
Mississippi	Code Title 71 Labor and Industry Chapter 13 Prohibition Against Empoyer Intimidation Act Chapter 11 Employment Protection Act Chapter 15 Mississippi Employment Fairness Act
Missouri	Code Title 71 Labor and Industry Chapter 13 Prohibition Against Empoyer Intimidation Act Chapter 11 Employment Protection Act Chapter 15 Mississippi Employment Fairness Act
North Carolina	Statute Chpater 95 Department of Labor and Labor Regulations Article 21 Retaliatory Employment Discrimination Chapter 143 State Departments, Institutions and Commissions Article 49A Equal Employm Practices Administrative Code Title 13 Labor Chapter 19 Retaliatory Employment Discrimination
South Carolina	Code Title 41 Labor and Employment Chapter 1 General Provisions Chapter 7 Right to Work
Tennessee	Code Title 50 Employer and Employee Chapter 1 Employment Relationship and Practices
Virginia	Code Title 40.1 Labor and Employment Chapter 3 Protections of Employees Article 1 Gene Provisions
West Virginia	Code Chapter 21 Labor Article 5 Wage Payment and Collection Article 5B Equal Pay for Equal Work Article 5C Minimum Wage and Maximum Hour Standard for Employees

- Federal and State laws
- World Bank Worldwide Governance Indicator
- United States Equal Employment Opportunity Commission (US EEOC)
- FSC US Controlled Wood National Risk Assessment (FSC US CWNRA)

	• SBP Regional Assessment for US Private Forests – (SBP RRA US)
Risk Rating justification	FSC US CWNRA concludes low risk for Category 2: Wood Harvested in violation of Traditional and Human Rights, which includes 2.2. Labour rights are respected, including rights as specified in ILO Fundamental Principles and Rights at work. "Discrimination with respect to employment is prohibited in the United States by Section VII of the Civil Rights Act of 1964 (Public Law 88-352) and is overseen by the U.S. Equal Employment Opportunity Commission (EEOC). There are several additional and complementary pieces of legislation, such as: the Equal Pay Act of 1963 (EPA), which protects men and women who perform substantially equal work in the same establishment from sex-based wage discrimination; the Age Discrimination in Employment Act of 1967 (ADEA), which protects individuals who are 40 years of age or older; Title I and Title V of the Americans with Disabilities Act of 1990, as amended (ADA), which prohibit employment discrimination against qualified individuals with disabilities in the private sector, and in state and local governments; Sections 501 and 505 of the Rehabilitation Act of 1973, which prohibit discrimination against qualified individuals with disabilities who work in the federal government;" "All indicators In the Category 1 (legality) assessment were designated as 'low risk' at a national scale, indicating that the relevant legislation is enforced." From the EEOC website Overview "The US EEOC is responsible for enforcing workplace laws including discrimination against individuals based on the basis of race, color, religion, sex (includes pregnancy, childbirth, and related medical conditions, sex stereotyping, transgender status, and gender identity), national origin (includes limited English proficiency), age, disability, political affiliation or belief in respect of employment and occupation." According to the World Bank Worldwide Governance Indicators the US consistently ranks high in Regulatory Quality and in Rule of Law. Evidence of the effectiveness of law enforcement is evident in news reporting and reveals no widespread or systematic ill treatment of workers in the workplace in the workplace in the Enviva supply base area. The United States Department of Labor provides verification of enforcement. (https://www.dol.gov/general/topic/youthlabor/enforcement) SBP RRA US "Based on the existence of clear and comprehensive Federal laws, State-level protections, and strong enforcement mechanisms, there is sufficient evidence to designate low risk for this indicator regarding workplace discrimination in hiring, remuneration, access to training, promotion, termination, and retirement." The risk rating justification includes Trees Outside of Forests.

Risk Rating	Low Risk

United States -	Indicator
4.1.5	Wages paid to workers shall meet or exceed the legal minimum wage or where there is no statutory minimum wage industry norms shall be met or exceeded
Supply Base Verifiers	Enviva conducted a risk assessment of federal and state laws and regulations and determined there is a sufficient and enforced legal structure in place to ensure feedstock sourcing and Enviva operations comply. Each state in the supply base area has laws addressing the compensation of workers. Some examples below.

Jurisdiction	Law/Code/Regulation/Statute
United States	Code Title 29 Labor Chapter 8 Fair Labor Standards CFR 29 Labor Chapter 14 Equal Employment Opportunity Commission
Alabama	Fair Labor Standards Act minimum wage rules apply
Arkansas	Code Title 11 Labor and Industrial Relations Chapter 4 Wage and Hour Regulations G Subchapter 2 Minimum Wage Law
Florida	Statute Title XXXI Labor Chapter 448 General Labor Regulations Part I Terms and Con
Georgia	Code Title 34 Labor and Industrial Relations Chapter 4 Minimum Wage Law
Kentucky	Statute Title XXVII Labor and Human Rights Chapter 337 Wages and hours Section Pa Generally Section Wage and Hour 337.275
Louisiana	Fair Labor Standards Act minimum wage rules apply
Mississippi	Fair Labor Standards Act minimum wage rules apply
Missouri	Statute Title XVIII Labor and Industrial Relations Chapter 290 Wages, Hours and Dism
North Carolina	Statutes Chapter 95 Department of Labor and Labor Regulations Article 2A Wage and Hour Act Section 95-25.3 Minimum Wage Article 11 Minimum Wage Act
South Carolina	Fair Labor Standards Act minimum wage rules apply
Tennessee	Fair Labor Standards Act minimum wage rules apply
Virginia	Code Title 40.1 Labor and Employment Chapter 3 Protections of Employees Article 1. Minimum Wage Act
West Virginia	Code Chapter 21 Labor Article 5C Minimum Wage and Maximum Hour Standard for E

- Federal and State laws
- World Bank Worldwide Governance Indicator
- United States Department of Labor
- FSC US Controlled Wood National Risk Assessment (FSC US CWNRA)
- SBP Regional Assessment for US Private Forests – (SBP RRA US)

Risk Rating justification	The Fair Labor Standards Act (FLSA) establishes minimum wage, overtime pay, recordkeeping, and child labor standards affecting full-time and part-time workers in the private sector and in federal, state, and local governments. The Wage and Hour Division (WHD) of the U.S. Department of Labor (DOL)

	administers and enforces the FLSA. The FSC US CWNRA concludes a low risk for category 1 Illegally Harvested Wood, including 1.12 Legal Employment – There is a large body of laws governing fair labor, worker safety and health. These laws protect forest workers by prescribing specific safety measures to employ and safety equipment to use while working. There is a low risk forest worker are not adequately protected. According to the World Bank Worldwide Governance Indicators the US consistently ranks high in Regulatory Quality and in Rule of Law. Evidence of the effectiveness of law enforcement is evident in news reporting and reveals no widespread or systematic wage issues in the Enviva supply base area. SBP RRA US “Based on the existence of a comprehensive Federal legal framework, State-level wage laws, and strong enforcement mechanisms, there is sufficient evidence to designate low risk for this indicator.” The risk rating justification includes Trees Outside of Forests.
Risk Rating	Low Risk

United States -	**Indicator**
4.1.6	Working hours shall comply with legal requirements.
Supply Base Verifiers	Enviva conducted a risk assessment of federal and state laws and regulations and determined there is a sufficient and enforced legal structure in place to ensure feedstock sourcing and Enviva operations comply. Each state in the supply base area has laws addressing the working hours for workers. Some examples below.

Jurisdiction	Law/Code/Regulation/Statute
United States	Code Title 29 Labor Chapter 8 Fair Labor Standards CFR 29 Labor Chapter 14 Equal Employment Opportunity Commission
Alabama	Fair Labor Standards Act minimum wage rules apply
Arkansas	Code Title 11 Labor and Industrial Relations Chapter 4 Wage and Hour Regulations Generally
Florida	Statute Title XXXI Labor Chapter 448 General Labor Regulations Part I Terms and Conditions of Employment 448.01 Legal day's work; extra pay
Georgia	Code Title 34 Labor and Industrial Relations
Kentucky	Statute Title XXVII Labor and Human Rights Chapter 337 Wages and hours
Louisiana	Fair Labor Standards Act minimum wage rules apply
Mississippi	Fair Labor Standards Act minimum wage rules apply
Missouri	Statute Title XVIII Labor and Industrial Relations Chapter 290 Wages, Hours and Dismisal Rights
North Carolina	Statutes Chapter 95 Department of Labor and Labor Regulations Article 2A Wage and Hour Act
South Carolina	Fair Labor Standards Act minimum wage rules apply
Tennessee	Fair Labor Standards Act minimum wage rules apply
Virginia	Code Title 40.1 Labor and Employment Chapter 3 Protections of Employees
West Virginia	Code Chapter 21 Labor Article 5C Minimum Wage and Maximum Hour Standard for Employees

	• Federal and State laws • World Bank Worldwide Governance Indicator • United States Department of Labor • FSC US Controlled Wood National Risk Assessment (FSC US CWNRA) • SBP Regional Assessment for US Private Forests – (SBP RRA US)
Risk Rating justification	The Fair Labor Standards Act (FLSA) establishes minimum wage, overtime pay, recordkeeping, and child labor standards affecting full-time and part-time workers in the private sector and in federal, state, and local governments. The Wage and Hour Division (WHD) of the U.S. Department of Labor (DOL) administers and enforces the FLSA. The FSC US CWNRA concludes a low risk for category 1 Illegally Harvested Wood, including 1.12 Legal Employment – There is a large body of laws governing fair labor, worker safety and health. These laws protect forest workers by prescribing specific safety measures to employ and safety equipment to use while working. There is a low risk forest worker are not adequately protected. According to the World Bank Worldwide Governance Indicators the US consistently ranks high in Regulatory Quality and in Rule of Law. Evidence of the effectiveness of law enforcement is evident in news reporting and reveals no widespread or systematic wage issues in the Enviva supply base area. SBP RRA US “Based on the existence of clear Federal and State-level regulations, high compliance rates, and enforcement mechanisms, there is sufficient evidence to designate low risk for this indicator.” The risk rating justification includes Trees Outside of Forests.
Risk Rating	Low Risk

United States -	**Indicator**
4.1.7	Workers shall have access to health care provisions, sickness benefits, retirement benefits, invalidity benefits, death benefits, and workers’ compensation
Supply Base Verifiers	Enviva conducted a risk assessment of federal and state laws and regulations and determined there is a sufficient and enforced legal structure in place to ensure feedstock sourcing and Enviva operations comply. Each state in the supply base area has laws addressing the health, retirement and other benefits for workers. Federal laws and regulations apply to all states. Some specific state examples below.

Jurisdiction	Law/Code/Regulation/Statute
United States	Code Title 29 Labor Chapter 8 Fair Labor Standards Chapter 29 Family and Medical Leave Act Chapter 18 Employee Retirement Income Security Code 42 Chapter 157 Quaility, Affordable Health Care for All Americans
Alabama	State Code Title 25 Industrial Relations and Labor Chapter 5 Workers' Compentation Chapter 4 Unemployment Compensation
Arkansas	Code Title 11 Labor and Industrial Relations Chapter 9 Workers Compensation Chapter 10 Division of Workforce Services Law Subchapter 11 Benefits Generally
Florida	Statute Title XXXI Labor Chapter 440 Workers' Compensation
Georgia	Code Title 34 Labor and Industrial Relations Chapter 8 Employment Security Chapter 9 Workers Compensation
Kentucky	Statute Title XXVII Labor and Human Rights Chapter 341 Unemployment compensation Chapter 342 Worker's Compensation
Louisiana	Code Title 23 Labor and Worker's Compensation Chapter 1 Louisiana Workforce Commission Chapter Prohibited Discriminationn Chapter 109 Workers' Compensation Chapter 11 Unemployment Compensation
Mississippi	Code Title 71 Labor and Industry Chapter 3 Workers' Compensation Chapter 5 Unemployment Compensation
Missouri	State Regulations Title 8 Department of Labor and Industrial Relations Division 10 Division of Employment Security Divison 50 Division of Workers Compensation Division 60 Missouri Commission on Human Rights
North Carolina	Chapter 97 Worker's Compensation Act Chapter 96 Employment Security
South Carolina	Code Title 42 Workers' Compensation Regulation Chapter 47 Department of Employment and Workforce
Tennessee	Code Title 50 Employer and Employee Chapter 6 Workers Compensation Law Chapter 7 Tennessee Employment Security
Virginia	Title 60.2 Unemployment Compensation Title 65.2 Worker's Compensation
West Virginia	Code Chapter 21A Unemployment Compensation Chapter 23 Workers' Compensation

- Federal and state laws
- United States Department of Labor
- World Bank worldwide Governance Indicators
- SBP Regional Assessment for US Private Forests – (SBP RRA US)

Risk Rating justification

Federal laws and regulations apply in all states and some states have laws and regulations that go beyond federal requirements. Federal programs managed at the state level include US Affordable Care Act, Family Medical Leave Act, Unemployment Compensation, Workers Compensation, and Social Security.

	The US Department of Labor and other federal agencies are responsible for monitoring and enforcement. According to the World Bank Worldwide Governance Indicators the US consistently ranks high in Regulatory Quality and in Rule of Law. Evidence of the effectiveness of law enforcement is evident in news reporting and reveals no widespread or systematic issues related to worker care as defined in the indicator in the Enviva supply base area. SBP RRA US “Given well-established laws pertaining to health care provisions, workers’ compensation, and benefits, a strong track record of enforcement, and the conclusions of other, widely-accepted analyses, along with direct feedback from stakeholders and experts, there is a well-supported conclusion of low risk that feedstock sourcing for biomass does not comply with all relevant laws within the geography of the RRA, including those related to workers’ access to healthcare, sickness benefits, retirement benefits, and workers’ compensation.” The risk rating justification includes Trees Outside of Forests.
Risk Rating	Low Risk

United States -	**Indicator**
4.1.8	Training shall be provided for all workers to allow them to implement the conditions set out in all elements of the SBP Standards relevant to their responsibilities.
Supply Base Verifiers	Enviva conducted a risk assessment of federal and state laws and regulations and determined there is a sufficient and enforced legal structure in place to ensure feedstock sourcing and Enviva operations comply. Each state in the supply base area has laws and regulations based on federal Occupational Safety and Health Administration regulations addressing training for workers. • Occupational Safety and Health Administration (OSHA) • World Bank Worldwide Governance Indicator • United States Department of Labor • Sustainable Forestry Initiative Fiber Sourcing (SFI) certificate holder • FSC US Controlled Wood National Risk Assessment (FSC US CWNRA) • SBP Regional Assessment for US Private Forests – (SBP RRA US)
Risk Rating justification	OSHA’s mission statement from their website “OSHA's mission is to assure America's workers have safe and healthful working conditions free from unlawful retaliation. OSHA carries out its mission

	by setting and enforcing standards; enforcing anti-retaliation provisions of the OSH Act and other federal whistleblower laws; providing and supporting training, outreach, education, and assistance; and working collaboratively with our state OSHA programs as well as ensuring that they are at least as effective as federal OSHA, furthering a national system of worker safety and health protections." The US Occupational Health and Safety Administration is responsible for implementing, monitoring, and enforcing worker health and safety laws and regulations. OSHA records of reportable injuries and rates are publicly available. OSHA work rules ensure workers have a right to a safe workplace. The law requires employers to provide their employees with working conditions that are free of known dangers. The OSHA law also prohibits employers from retaliating against employees for exercising their rights under the law (including the right to raise a health and safety concern or report an injury). For more information see www.whistleblowers.gov or worker rights. Monitoring and enforcement is conducted by the US Department of Labor. (https://www.osha.gov/dep/index.html) The SFI Fiber Sourcing Standard requires certificate holders to use qualified resource professionals, qualified logging professionals and certified logging companies; promote the use of the same and contractually require its suppliers to participate in SFI approved logger training programs. Enviva requires all primary feedstock suppliers to complete an annual training covering the necessary elements of SBP. Enviva also requires Commodity Managers and Foresters to complete an annual training to ensure staff understands their responsibilities in light of SBP and other certification systems. According to the World Bank Worldwide Governance Indicators the US consistently ranks high in Regulatory Quality and in Rule of Law. Evidence of the effectiveness of law enforcement is evident in news reporting and reveals no widespread or systematic issues related to worker training in the Enviva supply base area. The FSC US CWNRA concludes a low risk for category 1 Illegally Harvested Wood, including 1.12 Legal Employment – There is a large body of laws governing fair labor, worker safety and health. These laws protect forest workers by prescribing specific safety measures to employ and safety equipment to use while working. SBP RRA US "Given well-established laws and industry standards pertaining to worker training, a strong track record of enforcement, and the conclusions of other, widely accepted analyses, along with direct feedback from stakeholders and experts, there is a well-supported conclusion of low risk that feedstock

	sourcing for biomass does not comply with all relevant laws within the geography of the RRA, including those related to training provisions." The risk rating justification includes Trees Outside of Forests.
Risk Rating	Low Risk

United States -	**Indicator**
4.1.9	Mechanisms shall be in place for resolving grievances and disputes in the workplace.
Supply Base Verifiers	Enviva conducted a risk assessment of federal and state laws and regulations and determined there is a sufficient and enforced legal structure in place to ensure feedstock sourcing and Enviva operations comply. Federal and state laws are in place to resolve worker grievances and disputes.

Jurisdiction	Law/Code/Regulation/Statute
United States	Code Title 29 Labor Chapter 8 Fair Labor Standards CFR 29 Labor Chapter 14 Equal Employment Opportunity Commission
Alabama	Code Title 25 Industrial Relations and Labor Chapter 1 General Provisions
Arkansas	Code Title 11 Labor and Industrial Relations Chapter 3 Labor Relations and Practices Subchapter 4 L Disputes Code Title 16 Practice, Procedure and Courts Subtitle 7 Particular Proceedings and Remedies Chapt 123 Civil Rights Subchapter 1 Arkansas Civil Rights Act of 1993 16-123-107 Discrimination offense
Florida	Statute Title XXXI Labor Chapter 448 General Labor Regulations Part I Terms and Conditions of Employment 448.103 Employee's remedy; relief
Georgia	Rules and Regulations Department 186 Commission on Equal Opportunity Chapter 186-1 Administration Rule 186-1-.05 Complaint Processing
Kentucky	Statute Title XVII Economic Security and Public Welfare Chapter 207 Aid to the needey blind - equal opportunities Section equal Opportunities Act
Louisiana	Administrtative Code title 40 Labor and Employment PartXIX Louisiana Workforce Commission
Mississippi	Code Title 71 Labor and Industry Chapter 13 Prohibition Against Employer Intimidation
Missouri	State Regulations Title 8 Department of Labor and Industrial Relations Division 60 Missouri Commis on Human rights
North Carolina	Statute Chapter 95 Department of Labor and Labor Regulations Article 21 Retaliatory Employment Discriminiation Chapter 143 State Departments, Institutions and Commissions Article 49A Equal Employment Prac
South Carolina	Regulation Chapter 65 South Carolina Human Affairs Commission
Tennessee	Code Titlee 50 Employer and Employee Chapter 1 Employment Relationships and Practicies Part 1 Hiring Practicies Part 2 Right to Work Part 3 Working Conditions Generally Part 5 Healthy Workplace Act Part 8 Retaliatory Discharge
Virginia	Code Title 40.1 Labor and Employment Chapter 3 Protections of Employees Article 1 General Provisi Section 40.1-27.3 Retaliatory actions against employ prohibited
West Virginia	Code Chapter 5 General Powers and Authority of the Governor, Secretary of State and Attorney Gene Board of Public Works; Miscellanious Agencies, Commissions, Offices, Programs, etc. Article 11 Hu Rights Commission

- Federal and state law
- National Labor Relations Board (NLRB)

	• World Bank Worldwide Governance Indicator • United States Equal Employment Opportunity Commission (US EEOC) • SBP Regional Assessment for US Private Forests – (SBP RRA US)
Risk Rating justification	From the National Labor Relations Board website About NLRB Who We Are “The National Labor Relations Board (NLRB) is an independent federal agency created in 1935 and vested with the power to safeguard employees’ rights to organize, engage with one another to seek better working conditions, choose whether or not to have a collective bargaining representative negotiate on their behalf with their employer, or refrain from doing so. The NLRB also acts to prevent and remedy unfair labor practices committed by private sector employers and unions, as well as conducts secret-ballot elections regarding union representation. The NLRB is a bifurcated agency governed on one side by a five-person Board and on the other side by a General Counsel. Board Members and the General Counsel are appointed by the President with the consent of the Senate. The responsibilities and functions of the Agency under the 1935 National Labor Relations Act, as amended, are carried out by the National Labor Relations Board and its General Counsel, who, in addition to independent authority under the statute, exercises other authority by delegation from the Board.” From the EEOC website Overview “The US EEOC is responsible for enforcing workplace laws including discrimination against individuals based on the basis of race, color, religion, sex (includes pregnancy, childbirth, and related medical conditions, sex stereotyping, transgender status, and gender identity), national origin (includes limited English proficiency), age, disability, political affiliation or belief in respect of employment and occupation.” According to the World Bank Worldwide Governance Indicators the US consistently ranks high in Regulatory Quality and in Rule of Law. Evidence of the effectiveness of law enforcement is evident in news reporting and reveals no widespread or systematic issues related to the inability for workers to file a grievance or complaint and had affair hearing of the same in the Enviva supply base area. SBP RRA US “Based upon the existence of clear Federal and State regulations, established grievance resolution mechanisms, industry standards, and ongoing enforcement efforts, there is sufficient evidence to designate low risk for this indicator.” The risk rating justification includes Trees Outside of Forests.
Risk Rating	Low Risk

United States -	Indicator
4.1.10	Safeguards shall be put in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures.
Supply Base Verifiers	Enviva conducted a risk assessment of federal and state laws and regulations and determined there is a sufficient and enforced legal structure in place to ensure feedstock sourcing and Enviva operations comply. Each state in the supply base area has laws and regulations based on federal Occupational Safety and Health Administration regulations addressing training for workers.

Jurisdiction	Law/Code/Regulation/Statute
United States	Code Title 29 Labor Chapter 8 Fair Labor Standards CFR 29 Labor Chapter 17 Occupational Safety and Health Administration, Department of Labor
Alabama	Code Title 29 Labor Chapter 8 Fair Labor Standards CFR 29 Labor Chapter 17 Occupational Safety and Health Administration, Department of Labor
Arkansas	Code Title 11 Labor and Industrial Relations Chapter 2 Department of Labor Subchapter 1 Genera Provisions 11-2-116, 11-2-117
Florida	Code Title 29 Labor Chapter 8 Fair Labor Standards Administrative Code 61 Department of Business and Professional Regulation
Georgia	Code Title 34 Laor and Industrial Relations Chapter 2 Department of Labor Section 34-2-10 Empl
Kentucky	Statute Title XXVII Labor and Human Rights Chapter Chapter 338 Occupational safety and health employees
Louisiana	Code Title 23 Labor and Worker's Compensation Section23.1179 Occupational safety and health program
Mississippi	Code Title 71 Labor and Industry Chapter 1 Employer and Employee Section 71-1-1 Occupational and safety program
Missouri	Statutes Title XVIII Labor and Industrial Relations Chapter 292 Health and Safety of Employees
North Carolina	Statute Chapter 95 Department ofLabor and Labor Regulations Article 16 Occupational Safety an Health Act of North Carolina
South Carolina	Code Title 41 Labor and Employment Chapter 15 Occupational Health and Safety
Tennessee	Code Title 50 Employer and Employee Chapter 1 Employment Relationship and Practicies Part 5 Healthy Workplace Act Chapter 3 Occupational Safety and Health Act of 1972
Virginia	Code Title 40.1 Labor and Employment Chapter 3 Protection of Employees Article section 40.1-5 Duties of employers
West Virginia	Code Chapter 21 Labor Article 3A Occupational Safety and Health Act

- Occupational Safety and Health Administration (OSHA)
- World Bank Worldwide Governance Indicator
- United States Department of Labor
- SBP Regional Assessment for US Private Forests – (SBP RRA US)

Risk Rating justification	OSHA's mission statement from their website "OSHA's mission is to assure America's workers have safe and healthful working conditions free from unlawful retaliation. OSHA carries out its mission by setting and enforcing standards; enforcing anti-retaliation provisions of the

	OSH Act and other federal whistleblower laws; providing and supporting training, outreach, education, and assistance; and working collaboratively with our state OSHA programs as well as ensuring that they are at least as effective as federal OSHA, furthering a national system of worker safety and health protections." The US Occupational Health and Safety Administration is responsible for implementing, monitoring, and enforcing worker health and safety laws and regulations. OSHA records of reportable injuries and rates are publicly available. OSHA work rules ensure workers have a right to a safe workplace. The law requires employers to provide their employees with working conditions that are free of known dangers. The OSHA law also prohibits employers from retaliating against employees for exercising their rights under the law (including the right to raise a health and safety concern or report an injury). For more information see www.whistleblowers.gov or worker rights. Monitoring and enforcement is conducted by the US Department of Labor. (https://www.osha.gov/dep/index.html) According to the World Bank Worldwide Governance Indicators the US consistently ranks high in Regulatory Quality and in Rule of Law. Evidence of the effectiveness of law enforcement is evident in news reporting and reveals no widespread or systematic issues related to worker health and safety in the Enviva supply base area. SBP RRA US "Based on the clear federal regulations enforced by OSHA, State-level safety programs, comprehensive health and safety policies mandated for employers, there is sufficient evidence to designate low risk for this indicator." The risk rating justification includes Trees Outside of Forests.
Risk Rating	Low Risk

United States -	**Indicator**
4.2.1	Negative social and community impacts shall be identified and avoided.
Supply Base Verifiers	• Code Title 42 The Public Health and Welfare Chapter 55 National Environmental Policy • State level Forestry Action Plans • EPA • National Council for Air and Stream Improvement • Air and Water Permitting Agencies

	• Enviva Community Outreach • SBP Regional Assessment for US Private Forests – (SBP RRA US)
Risk Rating justification	Each state in the supply base area has a Forest Action Plan outlining the state's assessment of forest resources and analysis of trends and challenges and the state's top priorities for forestland within their borders. The plans are federally mandated to address forest health issues, access to recreation and resource development. The EPA developed a mapping tool, EPA Environmental Justice (EJ) Screen for public use to help companies, stakeholders and others to conduct high level assessments of potential EJ issues. NCASI recently released a Briefing Note to its members, BN-24-06 EJScreen Insights: A Resource for Industry Stakeholders with Updates in Version 2.3 encouraging members to be sure they fully understand the methodology behind the percentage calculations among other things. And to consider other sources when using the mapping tool. Each state has Environmental Quality Agency responsible for issuing and monitoring air and water permits. Enviva has all the necessary permits and is following air and water quality compliance standards. Enviva' Community Relations Managers are active in our sourcing regions and participate in many public activities where concerned community members can approach them to discuss concerns. SBP RRA US "Based on the existence of data collection by the US Census Bureau, State Forest Action Plans designed to promote community benefits, tools like the Environmental Justice Screening and Mapping Tool for monitoring impacts, and stakeholder consultation to address potential social issues, there is sufficient evidence to designate low risk. The risk rating justification includes Trees Outside of Forests.
Risk Rating	Low Risk

United States -	**Indicator**
4.2.5	Mechanisms shall be in place for resolving grievances and disputes relating to tenure and use rights of the forest and other land management practices.
Supply Base Verifiers	Enviva conducted a risk assessment of federal and state laws and regulations and determined there is a sufficient and enforced legal structure in place to ensure feedstock sourcing and Enviva operations comply. Some federal examples below

	• CFR 25 Indians • Subpart F Tribal Government • Subchapter H Land and Water • Subchapter I Energy and Mineral • Subchapter J Fish and Wildlife • Subchapter L Heritage Preservation • Civil Rights Division of the United States Department of Justice pamphlet Protecting the Civil Rights of American Indians and Alaska Natives Additional verifiers • FSC US Controlled Wood National Risk Assessment (FSC US CWNRA) • SBP Regional Assessment for US Private Forests – (SBP RRA US) • World Bank Worldwide Governance Indicator • Evidence in indicator 1.1.2 • See evidence offered in indicators 1.1.2 and 4.2.4
Risk Rating justification	Some of the FSC US CWNRA findings applicable to this indicator: Customary rights – The risk of violating a right held through adverse possession is low. If the right is being held openly and exclusively, the potential violator should be able to discover it through inspection of the land. Overall, customary rights being are not important in forest management, with the possible exception of Native American treaty rights. On balance the risk for this category is assessed as low. 1.15 Indigenous people's rights – Violations of Indigenous people's rights are considered a low risk because of the legal relationship between the federal government and Native American tribes. The two treat each other as sovereigns with treaties that outline tribal rights. 2.1 The forest sector is not associated with violent armed conflict, including that which threatens national or regional security and/or linked to military control to be low risk in the US. 2.2 Labor rights are respected including rights as specified in ILO Fundamental Principle and Rights at Work as low risk in the US.

	2.3 The rights of Indigenous and Traditional Peoples are upheld. In the United States, land use and tenure questions have long been decided and in the southeast, there are no indigenous people groups with controversial traditional or civil rights to forestlands. The FSC US CWNRA concluded, “Within the U.S. there is no UN Security Council ban on timber exports, the areas are not designated as a source of conflict timber, child labor does not occur systematically, and ILO Fundamental Principles and rights at work are generally respected. In addition, the U.S. has 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 U.S., Native Americans with a land base are recognized as Sovereign Nations and accorded rights to manage their land and affairs. In addition, Native Americans have an equitable process to resolve conflicts over land management. Through the U.S. court system, many Native American tribes have challenged, won decisions, and resolved issues concerning land management and use rights. There are many examples within the U.S. where tribes have successfully been able to exercise treaty rights through formal and informal conflict resolutions systems.” According to the World Bank Worldwide Governance Indicators the US consistently ranks high in Regulatory Quality and in Rule of Law. Evidence of the effectiveness of law enforcement is evident in news reporting and reveals no widespread or systematic issues related to legal, customary, and traditional tenure and use rights of Indigenous Peoples and local communities. SBP RRA US “Based on the established legal frameworks and support mechanisms aimed at addressing grievances and disputes related to land tenure, use rights, and forest management practices in the US, as evidenced by civil rights laws, the National Historic Preservation Act, and certification programs, there is sufficient evidence to designate low risk.” The risk rating justification includes Trees Outside of Forests.
Risk Rating	Low Risk

United States -	**Indicator**
4.2.7	Designated cultural heritage sites shall be preserved.
Supply Base Verifiers	Enviva conducted a risk assessment of federal and state laws and regulations and determined there is a sufficient and enforced legal structure in place to ensure feedstock sourcing and Enviva operations comply. Some examples below

Jurisdiction	Law/Code/Regulation/Statute
United States	Code Title 16 Conservation Chapter 1A Historic Sites, Buildings, Objects and Antiquitie Code Title 54 National Park Service and Related Programs Subtitle III National Preservation Progra
Alabama	Administrative Code Title 460 Alabama Historic Commission Title 220 Alabama Department of Conservation and Natural Resources Chapter 220-4 State Land Division Section 220-4-.05 State of Alabama Natural Heritage Program - Purpose Section 220-4-.06 State of Alabama Natural Heritage Program - General Policies
Arkansas	Code Title 15 Natural Resources and Economic Development Subtitle 1 Development of Economi and Natural Resources Generally Chapter 12 Arkansas Natural and Cultural Resources Council Administrative Code Agency 12 Department of Arkansas Heritage
Florida	Administrative Code 1 Department of State 1A Division of Historical Resources 1P Florida Folklife Program 1T Divison of Arts and Culture
Georgia	Code Title 44 Property Chapter 10 Historic Preservation Code Title 12 Conservation and Natural Resources Chapter 6 Forest Resources and Other Plant L Article 6 Forest Heritage Trust
Kentucky	Statute Title XII Conservation and Development Chapter 146 Natural Resources Heritage Land Conservation
Louisiana	Administrative Code Title 25 Cultural Resources Statute Title 25 Libraries, Museums and other Scientific Section 25.521 Louisiana Historical Preservation Sction 25.731-746 Historic Cemetary Preservation Act
Mississippi	Code Title 39 Libraries, Arts, Archives and History Administrative Code Title 16 History, Humanities and the Arts
Missouri	State Regulations Title 10 Department of Natural Resources Division 90 State Parks Chapter 3 Historic Preservation Statute Title XVI Conservation, Resources and Development Chapter 253 State Parks and Historic Preservation Section Historic Preservation
North Carolina	Administrative Code Title 7 Natural and Cultural Resources Statute Chapter 70 Indian Antiquities, Archaeological Resources and Unmarked Skelatal Remians Protection Chapter 113 Conservation and Development
South Carolina	Code Title 51 Parks, Recreation and Tourism Chapter 17 Heritage Trust Program
Tennessee	Code Title 11 Natural Areas and Recreation Chapter 7 Tennessee Heritage Conservation Trust Fu Act of 2005
Virginia	Administrative Code 17 Libraries and Cultural Resources Agency 10 Department of Historical Resources
West Virginia	Agency 82 Culture and History Title 82 Legislative Rule and Division of Culture and History

- FSC US Controlled Wood National Risk Assessment (FSC US CWNRA)
- SBP Regional Assessment for US Private Forests – (SBP RRA US)
- World Bank Worldwide Governance Indicator

Risk Rating justification

FSC CWNRA
1.9 Protected sites and species
"The US has a broad and comprehensive legal structure surrounding species protection and the protection of socially and ecologically important sites, administered at both the federal and state level. The quick way to find protected areas on a piece of public land is to look at the official management plan prepared by the responsible agency. Due to the transparency of

	planning and the active participation of interested members of the public, it is highly likely that the plan accurately identifies protected sites. The long way is to start first with the statute or executive order that assigned the land to a particular management agency. That may assign the land to a class of protected areas (e.g., national park, national monument, national historic landmark, etc.), may specify how it is to be managed or protected, and may specify areas within the land subject to special protections. The risks of non-compliance on public lands are generally low. The planning processes are open and transparent, with strong public participation. Conservation groups have shown a willingness to take agencies to court over protected area and Endangered Species Act issues. The Endangered Species Act has a citizen suit provision, 16 USC §1540(g), allowing any citizen to sue anyone, including the federal government, seeking an injunction to enforce the Act. As a result, the agencies are generally careful to follow the law on these matters. Where there are high instances of these privately initiated actions, there may be a higher level of risk. Private lands may have more risk. Zoning violations are going to occur, but they are going to be hard to disguise, and people will risk local enforcement actions. Damage to historic or archeological sites, especially if previously undiscovered, will be hard to detect, even for certification auditors. Damage to protected species may also be hard to detect, unless the auditor sees nests or individuals of the species near the site. However, violators of the Endangered Species Act face civil and criminal prosecution if caught, which is a strong deterrent. Overall, the risk on private lands is still low, but attention should be paid to areas known to be important to listed species, such as forests in the Pacific Northwest with salmon spawning streams, or forests in the Southeast with red-cockaded woodpeckers." According to the World Bank Worldwide Governance Indicators the US consistently ranks high in Regulatory Quality and in Rule of Law. Evidence of the effectiveness of law enforcement is evident in news reporting and reveals no widespread or systematic issues related to legal, customary, and traditional tenure and use rights of Indigenous Peoples and local communities. SBP RRA US "Based on the established legal frameworks and enforcement mechanisms aimed at preserving cultural heritage sites in the US, as evidenced by the NHPA, the ARPA, and State-level historic preservation programs, there is sufficient evidence to designate low risk for this indicator regarding the preservation of designated cultural heritage sites." The risk rating justification includes Trees Outside of Forests.
Risk Rating	Low Risk

Annex 2: EU RED Supply Base Evaluation

Countries where EU RED Supply Base Evaluation is used	
Country	United States
Area	-
Sustainable harvesting criteria 29(6)	
(i) The legality of harvesting operations	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-US-PF-FOR_v1.1 REDIII Level A for US Private FOR
Level B management system at the level of the forest sourcing area	N/A
(ii) Forest regeneration of harvested areas	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-US-PF-FOR_v1.1 REDIII Level A for US Private FOR
Level B management system at the level of the forest sourcing area	N/A
(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grasslands, heathland and peatlands, are protected with the aim of preserving biodiversity and preventing habitat destruction, unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-US-PF-FOR_v1.1 REDIII Level A for US Private FOR
Level B management system at the level of the forest sourcing area	N/A
(iv) that harvesting is carried out considering the maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth forests as defined in the country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located, and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with requirements to use logging systems that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and habitats	

Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-US-NF-FOR v1.2 REDIII Level A for US National FOR
Level B management system at the level of the forest sourcing area	N/A
(v) That harvesting maintains or improves the long-term production capacity of the forest.	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-RED-US-PF-FOR_v1.1 REDIII Level A for US Private FOR
Level B management system at the level of the forest sourcing area	N/A
(vi)[1] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. *Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:* *(a) **primary forest** and other wooded land and **old growth forest,** namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located. If there is no definition of **old growth forest** at the national level, then the following definition shall apply: A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.*	
Type of Risk Assessment used	☐Level A – proof at national or sub-national level ☒Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Responsible Sourcing Policy MWPA Enviva HCV Procedures FSC CW US NRA SBP Indicators: 2.1.1, 2.1.2, 2.1.3, 3.2.3 Requirement met through SBP 3.2.3
(vi)[2] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. *Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:* *(b) **highly biodiverse forest** and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.*	
Type of Risk Assessment used	☐Level A – proof at national or sub-national level ☒Level B – management system at forest sourcing area level
Level A risk assessment description	N/A

Level B management system at the level of the forest sourcing area	Responsible Sourcing Policy MWPA Enviva HCV Procedures FSC CW US NRA SBP Indicators: 2.1.1, 2.1.2, 2.1.3, 3.2.3. Requirement met through SBP 3.2.3.
(vi)[3] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. *Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:* *(d) **highly biodiverse grassland** spanning more than one hectare that is: (i) natural, namely grassland that would remain grassland in the absence of human intervention and that maintains the natural species composition and ecological characteristics and processes; or (ii) non-natural, namely grassland that would cease to be grassland in the absence of human intervention and that is species-rich and not degraded and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the harvesting of the raw material is necessary to preserve its status as highly biodiverse grassland.*	
Type of Risk Assessment used	☐Level A – proof at national or sub-national level ☒Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Responsible Sourcing Policy MWPA Enviva HCV Procedures FSC CW US NRA SBP Indicators: 2.1.1, 2.1.2, 2.1.3, 3.2.3. Requirement met through SBP 3.2.3.
(vi)[4] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. *Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:* *(e) **heathland** - Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).*	
Type of Risk Assessment used	☐Level A – proof at national or sub-national level ☒Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Responsible Sourcing Policy MWPA Enviva HCV Procedures FSC CW US NRA SBP Indicators: 2.1.1, 2.1.2, 2.1.3, 3.2.3. Requirement met through SBP 3.2.3.
(vi)[5] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. *Article 29 (4): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:*	

*(a) **wetlands,** namely land that is covered with or saturated by water permanently or for a significant part of the year (NOTE: Evidence of verification of wetlands should reflect seasonal changes within a year).*	
Type of Risk Assessment used	☐Level A – proof at national or sub-national level ☒Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Responsible Sourcing Policy MWPA Enviva HCV Procedures FSC CW US NRA SBP Indicators: 2.1.1, 2.1.2, 2.1.3, 3.2.3. Requirement met through SBP 3.2.3.
(vi)[6] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. *Article 29 (5): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was **peatland** in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.*	
Type of Risk Assessment used	☐Level A – proof at national or sub-national level ☒Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Responsible Sourcing Policy MWPA Enviva HCV Procedures FSC CW US NRA SBP Indicators: 2.1.1, 2.1.2, 2.1.3, 3.2.3. Requirement met through SBP 3.2.3.
(vii) that installations producing biomass fuels from forest biomass, issue a statement of assurance, underpinned by company-level internal processes, for the purpose of the audits conducted pursuant to Article 30(3), that the forest biomass is not sourced from the lands referred to in point (vi).	
Type of Risk Assessment used	☒Level A – proof at national or sub-national level ☐Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	*Not applicable, requirement only applies to Level A*

LULUCF criteria 29(7)	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	With the exit of the Paris Agreement U.S. biomass producers must provide level B evidence to ensure carbon stocks are stable or increasing.

	SBP Guidance for US RED III Level B LULUCF v1.0 ENV-SBP-15 Enviva RED III Level B Risk Assessment.

Annex 2a: EU RED II Supply Base Evaluation

Annex 3: SBP Processing residues and/or Post-consumer feedstock requirements

☐ Not Applicable (Processing Residues and/or post-consumer feedstock not used)

Verification and monitoring of suppliers

Enviva's District of Origin (DOO) process is used obtain processing and sourcing information from all of our residual suppliers. In 2023 the annual update portion of the DOO process was revised to meet the requirements of REDII. 100% of all residual suppliers completed a revised DOO annual update form that included a signed self-declaration document confirming the supplier was delivering a residue to Enviva. All suppliers with a mill or processing facility were visited by Enviva staff to confirm the information provided on the DOO form was accurate. Aerial imagery was used to verify material input/output and residue storage locations. Suppliers verified sourcing areas, species accepted, products produced, and raw material purchasing practices.

Feedstock inspection and classification upon receipt

Residual feedstock categories for each supplier are set up within our scaling software (LIMS) prior to delivery. Upon receipt loads are entered into the system in the appropriate category. Summaries are produced through a Power BI spreadsheet and reviewed by Enviva staff familiar with the suppliers delivering to each Enviva facility. Credit ledgers are populated with volumes acquired through Power BI. Residual supplier site visits also serve as a means to verify the feedstock categories for each supplier.

Supplier audit for processing residues and post-consumer feedstock

Enviva's District of Origin (DOO) process is used obtain processing and sourcing information from all of our residual suppliers. In 2023 the annual update portion of the DOO process was revised to meet the requirements of REDII. 100% of all residual suppliers completed a revised DOO annual update form that included a signed self-declaration document confirming the supplier was delivering a residue to Enviva. All suppliers with a mill or processing facility were visited by Enviva staff to confirm the information provided on the DOO form was accurate. Aerial imagery was used to verify material input/output and residue storage locations. Suppliers verified sourcing areas, species accepted, products produced, and raw material purchasing practices.

Annex 4: EU RED detailed findings for Trees Outside Forest (TOF) feedstock

NOTE: For "Trees outside forests (TOF) – Urban and landscape feedstock" no EU RED sustainability requirements apply, only the GHG savings criteria apply (SBP EU RED Bridging ID v2.0 Section 1.1). The land use category in this case is neither forest land nor agricultural land. For "Trees outside forests (TOF) – Agricultural land feedstock" the applicable criteria are Article 29 paragraphs (2)-(5).

Country: United States - -

Not Applicable - only urban and landscape feedstock is used

Annex 4a: RED II detailed findings for Trees Outside Forest (TOF) feedstock

NOTE: For "Trees outside forests (TOF) – Urban and landscape feedstock" no REDII sustainability requirements apply, only the GHG savings criteria apply (SBP REDII Bridging ID Section 4.2). The land use category in this case is neither forest land nor agricultural land. For "Trees outside forests (TOF) – Agricultural land feedstock" the applicable criteria are Article 29 paragraphs (2)-(5).