



# Supply Base Report:

## Nutjobs Inc, dba AllMade Materials Main (Initial) 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](http://www.sbp-cert.org)

### Document history

|                    |                                |
|--------------------|--------------------------------|
| <b>Version 1.0</b> | <b>Published 26 March 2015</b> |
| <b>Version 2.0</b> | Published 10 August 2023       |
| <b>Version 2.1</b> | Published 15 April 2024        |
| <b>Version 2.2</b> | Published 21 May 2025          |
| <b>Version 2.3</b> | Published 14 August 2025       |

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## 1 Overview

|                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Producer name:</b>                    | Nutjobs Inc, dba AllMade Materials                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Producer address:</b>                 | 10 Harris Ct., Unit C-1, Monterey CA 93940, United States                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>SBP Certificate Code:</b>             | SBP-11-50                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Geographic position:</b>              | 36.581740, -121.819720                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Primary contact:</b>                  | Jeff Anderson,<br>+1 831 230 3854,<br>jeff@allmadematerials.com                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Company website:</b>                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Date report finalised:</b>            | 29 Jul 2026                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>SBR reporting period from:</b>        | 30 Jul 2025                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>SBR reporting period to:</b>          | 31 Jul 2026                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Name of the Certification Body:</b>   | Control Union Certifications BV                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Certification Body Approval date:</b> | 03 Oct 2026                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>SBP Standard(s) used:</b>             | 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. v2.1, Instruction Document Japan: Bridging Requirements for meeting Japanese sustainability, legality and GHG saving requirements v1.1 -, Instruction Document EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413, Instruction Document Japan: Bridging Requirements for meeting Japanese sustainability, legality and GHG saving requirements v1.2 |
| <b>Feedstock origin (countries)</b>      | United States (California)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Weblink to Standard(s) used:</b>      | <a href="https://sbp-cert.org/documents/standards-documents/standards">https://sbp-cert.org/documents/standards-documents/standards</a>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

## 2 Description of the Biomass Producer and the Supply Base

### 2.1 Description of the company

AllMade Materials is a U.S.-based producer and supplier of woody biomass sourced from Trees Outside Forests (TOF) on private agricultural land in California. AllMade Materials is also U.S.-based trade of wood chips and pellets. The company works with agricultural producers to recover woody biomass generated during routine orchard removal and redevelopment activities, converting this material into biomass products for industrial energy and other sustainable end uses.

AllMade Materials manages the sourcing, processing, storage, and supply of biomass while maintaining traceability throughout its supply chain. The company is pursuing SBP certification to demonstrate responsible sourcing practices and to supply sustainable biomass to domestic and international markets.

**Products included in the scope of SBP Certification:** WB 1.1 Wood pellets, WB 2.1 Wood chips

**Number of employees:** 1

**Annual maximum production capacity (metric tonnes):** 1000000

**Number of direct feedstock suppliers:** 1

**Approximate number of feedstock sub-suppliers:** 0

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

Woody biomass is sourced directly from privately owned commercial orchards located on agricultural land in California's Central Valley. Following routine orchard removal, trees are processed into wood chips and transported to dedicated and segregated storage before export. AllMade Materials maintains documented traceability from the point of harvest through processing, storage, transportation, and shipment. Feedstock is sourced directly from the orchard owner/operator, with no intermediaries or sub-suppliers within the certified supply chain.

### 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.*

|                                                              |                                                               |
|--------------------------------------------------------------|---------------------------------------------------------------|
| <b>Country</b>                                               | United States                                                 |
| <b>Area/Region</b>                                           | California                                                    |
| <b>Exclusions</b>                                            |                                                               |
| <b>Feedstock types</b>                                       | Primary feedstock                                             |
| <b>Feedstock Product Groups</b>                              | Trees outside forest (TOF) - Agricultural land feedstock (3A) |
| <b>Feedstock inputs</b>                                      | SBP Compliant feedstock                                       |
| <b>Is the forest managed to supply energy and non-energy</b> | N/A                                                           |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                    |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|
| <b>markets?</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                    |
| <b>For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?</b>                                                                                                                                                                                                                                                                                                                                                    | N/A                                                                                                |
| <b>Risk assessment(s)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Yes – Regional Risk Assessment (RRA) used, Yes – Biomass Producer's own risk assessment used (SBE) |
| <b>Provide a concise summary of why a SBE was determined to be required or not required here:</b>                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                    |
| A regional risk assessment is available for the United States and forms a reference point for the risk evaluation. Because the certified supply base is limited to Trees Outside Forests (TOF) on private agricultural land in California, AllMade Materials also performed supply-base-specific evaluations to assess the applicability of the regional findings and address characteristics specific to the certified feedstock.                                                                  |                                                                                                    |
| <b>Feedstock types included in SBE:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Primary feedstock                                                                                  |
| <b>Includes EU RED SBE:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | No                                                                                                 |
| <b>Includes EU RED II SBE grandfathering</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                        | No                                                                                                 |
| <b>Includes EU RED TOF:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Yes                                                                                                |
| <b>Includes EU RED II TOF grandfathering</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                        | No                                                                                                 |
| <b>Size of Supply Base area (million ha):</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 42.4000                                                                                            |
| <b>Map(s) of the Supply Base area:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                    |
| The supply base comprises privately owned agricultural land within the State of California, USA, where commercial orchards are periodically removed and replanted as part of normal agricultural management. Feedstock originates exclusively from Trees Outside Forests (TOF) located on private agricultural land. A map showing the State of California and the principal commercial orchard production can be found at the following link: <a href="#">Map of Almond Orchards in California</a> |                                                                                                    |

## 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:**

Prunus amygdalus

Almond Wood

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

**Explanation:** Not applicable. Feedstock is sourced exclusively from Trees Outside Forests (TOF) located on privately owned agricultural land. Biomass is generated during routine commercial orchard removal and replanting, not from forest pest control, disease management, or salvage operations.

- e. **Hardwood (i.e. broadleaf trees): specify proportion of feedstock from (%):** 100.00
- f. **Softwood (i.e. coniferous trees): specify proportion of feedstock from (%):** 0.00
- 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 (%):** 0.00
- j. **Select forest type(s) where the primary feedstock was sourced from:** Other
- k. **Select the main harvesting system(s) used for the sourced primary feedstock:** Other
- l. **Volume of primary feedstock from primary forest:** 0 tonnes
- m. **Volume of processing residues feedstock:** 0  
**Physical form of the feedstock:** N/A
- n. **Share of SBP-recognised system claim for processing residues:**

- o. **Volume of post-consumer feedstock:** 0  
**Physical form of the feedstock:** N/A
- p. **Estimated amount of EU RED-compliant sustainable feedstock that could be collected annually by the BP:** 100 %
- q. **What is the estimated amount of EU RED-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated):** 0.00 tonnes

**Explanation:** Not applicable. This certification scope is limited to SBP. EU RED compliance is not being claimed under the current certification scope.

### 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

AllMade Materials conducted a Supply Base Evaluation for biomass sourced from Trees Outside Forests (TOF), specifically end-of-life almond orchards located in California, USA. The evaluation considered applicable legislation, land tenure, environmental values, biodiversity, labor and human rights, indigenous peoples, health and safety, conversion, and other relevant SBP indicators.

The evaluation concluded that the supply base represents an overall **low risk** due to the strong legal and regulatory framework within California and the United States, the agricultural nature of the feedstock, and the fact that the material originates from planned orchard replacement rather than forest harvesting. The supply base excludes primary forests, naturally regenerated forests, and conservation areas.

A detailed risk assessment was completed using applicable SBP Regional Risk Assessments, publicly available government information, stakeholder consultation, and company-specific due diligence. Where existing Regional Risk Assessments did not fully address California Trees Outside Forests, additional company-specific assessments were performed to evaluate relevant risks.

Based on this evaluation, AllMade Materials has determined that the supply base is suitable for SBP-certified sourcing, subject to implementation of the company's documented supply chain controls and ongoing monitoring procedures.

#### 3.2 Conflicts with applicable national and sub-national legislation

No conflicts have been identified between applicable national or sub-national legislation and the requirements of the SBP Standards.

The supply base operates within California and is subject to comprehensive federal, state, and local legislation governing agriculture, environmental protection, labor, occupational health and safety, transportation, and business operations. California maintains robust regulatory oversight and enforcement mechanisms.

During the Supply Base Evaluation, no material legal conflicts or regulatory inconsistencies were identified that would prevent compliance with SBP requirements. The company will continue to monitor changes in relevant legislation as part of its ongoing due diligence and management review process.

#### 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.*

|                                   |
|-----------------------------------|
| <b>Country:</b> United States     |
| <b>Area/sub-scope:</b> California |
| <b>Risk Assessment used:</b>      |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| <b>Indicator with specified risk:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 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.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Description of the specific risk:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <p>The risk that orchard removal could adversely affect an identified key species, sensitive habitat, ecosystem, or biodiversity-related HCV is addressed through the screening and evaluation required under Indicators 2.1.1 and 2.1.2.</p> <p>If the screening identifies a biodiversity concern that could be affected by orchard removal, AllMade shall inform the grower and establish specific measures necessary to avoid or mitigate the potential impact. Where specialist knowledge is required, the appropriate measures shall be developed in consultation with a suitably qualified expert.</p> <p>Sourcing from the affected area shall proceed only after the required mitigation measures have been communicated and implemented.</p> <p><b>Trees Outside Forests (TOF)</b></p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Mitigation measure:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <ul style="list-style-type: none"> <li>• AllMade shall inform the grower of the identified concern.</li> <li>• AllMade shall determine appropriate mitigation measures, consulting a suitably qualified expert where necessary.</li> <li>• The grower shall be instructed on the measures required during orchard removal.</li> <li>• AllMade shall retain evidence demonstrating that the required measures were followed.</li> </ul>                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Monitoring and outcomes:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <ul style="list-style-type: none"> <li>• Screening and evaluation records from Indicators 2.1.1 and 2.1.2</li> <li>• Supplier declaration</li> <li>• Written mitigation instructions to the grower, where applicable</li> <li>• Expert input, where applicable</li> <li>• Photographs, records, or other evidence demonstrating implementation of required mitigation measures</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

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| <b>Country:</b> United States                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Area/sub-scope:</b> California                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Risk Assessment used:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| <b>Indicator with specified risk:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <p>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.</p>                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Description of the specific risk:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <p>The SBP Regional Risk Assessment for the U.S. Southeast addresses this indicator by demonstrating that forest carbon stocks remain stable or increase over time using U.S. Forest Service Forest Inventory and Analysis (FIA) data in accordance with Route C. This approach is appropriate for commercial forest management but is not directly applicable to AllMade Materials because the Supply Base consists entirely of <b>Trees Outside Forests (TOF)</b>, specifically commercial almond orchards in California.</p> <p>Potential carbon-related risk within the Supply Base would arise if procurement encouraged permanent conversion of tree cover or changes in land use that reduced long-term carbon storage. This risk is limited because biomass is sourced exclusively from orchards that are being removed as part of normal agricultural renovation and replanting. Orchard removal does not represent conversion of forest land or natural ecosystems, and the land remains in long-term agricultural production with new orchards typically replanted following removal.</p> <p>Accordingly, procurement by AllMade Materials does not create an incentive for land-use change or the depletion of long-term carbon stocks beyond normal orchard replacement cycles.</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Mitigation measure:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

AllMade Materials restricts procurement exclusively to biomass generated from the removal of existing commercial almond orchards within California. Biomass originating from natural forests, land conversion, or non-eligible sources is excluded from the Supply Base.

Supplier qualification includes verification that biomass originates from legitimate orchard removals associated with normal agricultural operations. Procurement documentation and chain-of-custody records are maintained to demonstrate the origin of feedstock and confirm that sourcing is limited to eligible TOF material.

Because California almond production is based on recurring orchard replacement, procurement supports the beneficial use of biomass that would otherwise be burned, landfilled, or otherwise disposed of, without encouraging additional tree removal beyond normal agricultural management.

#### Monitoring and outcomes:

AllMade Materials monitors compliance through supplier qualification records, procurement documentation, chain-of-custody verification, and periodic internal audits.

Monitoring activities verify that:

- biomass originates exclusively from commercial almond orchards within the approved Supply Base;
- orchard removals are part of established agricultural management and replanting cycles;
- procurement does not include material originating from land-use conversion, natural forests, or other non-eligible sources; and
- procurement requirements continue to be consistently implemented throughout the supply chain.

To date, AllMade Materials has identified no evidence that procurement has contributed to permanent land-use change or reductions in long-term tree cover within the Supply Base. Biomass continues to originate from routine orchard replacement activities, where agricultural tree cover is maintained through replanting. Based on these controls, the residual risk associated with this indicator is considered **Low**.

**Country:** United States

**Area/sub-scope:** California

#### 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

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| <b>Indicator with specified risk:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                            |
| 2.2.7 Pesticides shall only be used as part of an Integrated Pest Management (IPM) plan in compliance with national legislation, chemical safety data sheets and industry best practice. Banned pesticides shall not be used.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                            |
| <b>Description of the specific risk:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                            |
| <p>Unlike commercial forestry, commercial almond production relies on the use of pesticides as part of routine crop management. Potential risks arise if pesticides are applied in a manner that is inconsistent with applicable regulations, outside of an Integrated Pest Management (IPM) program, or if prohibited pesticides are used.</p> <p>California maintains one of the world's most comprehensive pesticide regulatory systems through the California Department of Pesticide Regulation (DPR), in conjunction with the U.S. Environmental Protection Agency (EPA). Pesticide use is subject to product registration, applicator licensing, mandatory reporting, worker protection requirements, and enforcement by County Agricultural Commissioners. California almond growers are also encouraged to implement Integrated Pest Management (IPM) practices through guidance published by the University of California Integrated Pest Management Program (UC IPM) and industry best management practices.</p> <p>Because AllMade Materials procures biomass exclusively from existing commercial almond orchards that operate within this regulatory framework, the risk of non-compliant pesticide use is considered limited.</p> |                                                                            |
| <b>Mitigation measure:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                            |
| <p>AllMade Materials procures biomass only from commercial almond orchards operating in compliance with applicable federal, state, and local agricultural regulations. Suppliers are expected to manage orchards in accordance with applicable pesticide laws and industry best practices, including the use of Integrated Pest Management (IPM) principles where appropriate.</p> <p>Supplier qualification includes verification that biomass originates from legitimate commercial orchards operating under California's agricultural regulatory framework. Biomass is generated only after orchards have reached the end of their productive life and are removed as part of normal agricultural replanting cycles. AllMade Materials does not direct or influence pesticide selection or application but requires suppliers to comply with all applicable legal requirements governing pesticide use.</p>                                                                                                                                                                                                                                                                                                                                   |                                                                            |
| <b>Monitoring and outcomes:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                            |
| <p>Compliance is monitored through supplier qualification, procurement documentation, chain-of-custody verification, and periodic internal audits of procurement activities.</p> <p>Monitoring activities verify that biomass continues to originate from eligible commercial almond orchards operating within California's regulatory framework and that no evidence exists of procurement from suppliers subject to significant pesticide-related enforcement actions or other regulatory non-compliance that would affect eligibility.</p> <p>To date, AllMade Materials has identified no evidence of systematic non-compliance with applicable pesticide legislation or the use of prohibited pesticides within its Supply Base. Based on California's robust regulatory oversight, supplier qualification procedures, and procurement controls, the residual risk associated with this indicator is considered <b>Low</b>.</p>                                                                                                                                                                                                                                                                                                             |                                                                            |

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| <b>Area/sub-scope:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Risk Assessment used:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| <b>Indicator with specified risk:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 2.2.3 Soil quality in the Supply Base shall be maintained or enhanced                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Description of the specific risk:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <p>Orchard removal involves heavy equipment, tree and stump/root removal, and associated soil disturbance. If not appropriately managed, these activities have the potential to adversely affect soil quality. Prior to accepting material from an orchard removal, AllMade will confirm with the grower whether the land will be replanted with almonds or another agricultural crop.</p> <p><b>Where the land will be replanted:</b> Successful establishment of the subsequent crop will be used as evidence that the soil remains capable of supporting productive agricultural use and that soil quality has not been materially degraded by the orchard removal.</p> <p><b>Where the land will not be replanted:</b> AllMade will obtain representative soil testing before orchard removal and again following removal. Pre- and post-removal results will be compared to determine whether the removal activity resulted in material degradation of soil quality.</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Mitigation measure:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Orchard removal contractors will be instructed to conduct removal in a manner that minimizes unnecessary soil disturbance.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Monitoring and outcomes:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <ul style="list-style-type: none"> <li>• Grower confirmation of intended post-removal land use.</li> <li>• If replanted: photographs confirming establishment of the subsequent orchard or crop.</li> <li>• If not replanted: pre- and post-removal soil analysis comparing relevant soil-quality parameters.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

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| <b>Area/sub-scope:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Risk Assessment used:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| <b>Indicator with specified risk:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 2.1.2 Threats to and impacts on the identified key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified and evaluated.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Description of the specific risk:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <p>Potential threats to key species, sensitive habitats, ecosystems, or biodiversity-related HCVs are evaluated through the parcel-level screening completed under Indicator 2.1.1.</p> <p>For each sourcing APN, AllMade reviews agricultural zoning and land-use records, historical aerial imagery, and CNDDDB mapping to determine whether the parcel or sourcing activity presents an identified biodiversity concern.</p> <p>Where the screening confirms long-term agricultural use and does not identify a biodiversity concern requiring further action, the risk is considered mitigated through the documented assessment.</p> <p>If the screening identifies a potential concern or uncertainty, the matter shall be further evaluated before sourcing proceeds.</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Mitigation measure:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| AllMade shall document its evaluation of the screening results for each sourcing area. Any identified potential biodiversity concern or uncertainty shall be escalated for further assessment and, where appropriate, consultation with a suitably qualified expert.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Monitoring and outcomes:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <ul style="list-style-type: none"> <li>• Agricultural zoning/land-use records</li> <li>• Historical aerial imagery</li> <li>• CNDDDB screening images/records</li> <li>• Supplier declaration</li> <li>• Documented evaluation of screening results</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

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| <b>Area/sub-scope:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Risk Assessment used:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| <b>Indicator with specified risk:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 2.1.1 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Description of the specific risk:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <p>Commercial almond orchards may contain or be located near key species, sensitive habitats, ecosystems, or areas of High Conservation Value (HCV). Accordingly, this indicator is assessed as <b>Specified Risk</b> and requires parcel-level screening.</p> <p>Before sourcing, each APN shall be screened using:</p> <ul style="list-style-type: none"> <li>• applicable agricultural zoning and land-use records;</li> <li>• historical aerial imagery to confirm long-term agricultural use; and</li> <li>• California Natural Diversity Database (CNDDB) mapping to identify documented sensitive species, habitats, natural communities, or other biodiversity concerns.</li> </ul> <p>The screening and its results shall be documented for each sourcing area.</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Mitigation measure:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| All sourcing APNs must complete the required desktop screening before material is accepted. Any potential biodiversity concern identified through the screening shall be flagged for further evaluation under Indicators 2.1.2 and 2.1.3.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Monitoring and outcomes:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <ul style="list-style-type: none"> <li>• Agricultural zoning/land-use records</li> <li>• Historical aerial imagery</li> <li>• CNDDB screening images/records</li> <li>• Supplier declaration</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

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| <b>Area/sub-scope:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Risk Assessment used:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <input type="checkbox"/> SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim<br><input type="checkbox"/> SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim<br><input type="checkbox"/> SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim<br><input type="checkbox"/> SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed<br><input type="checkbox"/> SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim<br><input type="checkbox"/> SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed<br><input type="checkbox"/> SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed<br><input type="checkbox"/> SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed<br><input type="checkbox"/> SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim<br><input type="checkbox"/> SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim<br><input type="checkbox"/> SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim<br><input type="checkbox"/> SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim<br><input type="checkbox"/> SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim<br><input type="checkbox"/> SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim<br><input checked="" type="checkbox"/> Biomass Producer's own risk assessment |
| <b>Indicator with specified risk:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 2.2.5 Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Description of the specific risk:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <p>Water availability and groundwater use are recognized concerns in California agriculture, including almond production. Accordingly, AllMade Materials designates this indicator as Specified Risk.</p> <p>The Almond Board of California identifies irrigation efficiency as an important component of sustainable almond production. Its California Almond Sustainability Program specifically evaluates orchard irrigation systems, including drip and micro-irrigation, and identifies micro-irrigation as an important water-conservation practice. California Department of Water Resources similarly identifies agricultural water-use efficiency as an important component of responsible water management in California.</p> <p>Almond Board of California — California Almond Sustainability Program: Irrigation Management Module — explicitly identifies <b>drip, micro-sprinkler, flood/furrow and sprinkler</b> as irrigation-system types evaluated under the sustainability program.</p> <p>Almond Board of California — Almond Sustainability / Water Efficiency — explains that micro-irrigation applies water where the crop needs it and can reduce runoff and waste while allowing more precise irrigation.</p> <p>California Department of Water Resources — Agricultural Water Use Efficiency — establishes agricultural water-use efficiency as a recognized California water-management objective.</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Mitigation measure:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Supplying orchards shall use drip or micro-irrigation systems as a water-conservation practice.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

**Monitoring and outcomes:**

Photographic or other documented evidence demonstrating that the supplying orchard uses drip or micro-irrigation.  
The supplier declaration shall also confirm the use of drip or micro-irrigation at the supplying orchards.

## 4 Stakeholder engagement

### 4.1 General description

**Biomass Producer's stakeholder engagement start date:** 14 Jul 2026

**Biomass Producer's stakeholder engagement end date:** 30 Aug 2026

**Total number of stakeholders contacted:** 3

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

AllMade Materials identified and contacted three organizations with recognized expertise relevant to California agricultural biomass, sustainability, and biomass utilization. Stakeholders were selected based on their knowledge of agricultural sustainability, almond production, and biomass valorization rather than regulatory authority, reflecting the limited scope of the certified supply base.

The organizations contacted were:

- **BEAM Circular** – A California non-profit organization focused on biomass utilization, circular bioeconomy development, and commercialization of agricultural biomass.
- **Sustainable Conservation** – A California nonprofit organization with expertise in agricultural sustainability, working lands, and practical environmental solutions.
- **Almond Board of California** – The California almond industry's research and technical organization, including work relating to orchard biomass and sustainability.

Each stakeholder was contacted via email describing the proposed SBP certification scope and was invited to provide comments or raise any concerns regarding the certified supply base. One stakeholder acknowledged receipt of the notification and thanked AllMade Materials for the information but did not provide any comments or concerns. No substantive comments or objections were received from any stakeholder.

### 4.2 Response to stakeholder comments

**Stakeholder description:** Karen Warner, BEAM Circular

**Stakeholder comment:** Acknowledged receipt of the stakeholder notification and thanked AllMade Materials. No comments or concerns regarding the certification scope were provided.

**Response to the stakeholder:** No response required. Stakeholder acknowledgement recorded.

## 5 Report updates and approval

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

**Summary of changes:** N/A

|                                |               |
|--------------------------------|---------------|
| <b>Name</b>                    | Jeff Anderson |
| <b>Title</b>                   | Report author |
| <b>Date of report approval</b> | 29 Jul 2026   |

## Annex 1: Detailed findings for Supply Base Evaluation indicators

| United States<br>California | Indicator                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|-----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.1.1                       | Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Supply Base Verifiers       | <ul style="list-style-type: none"> <li>• Supplier declaration</li> <li>• California business registration (public verification that the entity is in good standing with the State of California)</li> <li>• Applicable federal, state and county regulatory framework</li> </ul>                                                                                                                                                                                                                                                                                                                                                                |
| Risk Rating justification   | The supply base consists exclusively of privately owned commercial almond orchards located in California. Orchard management, removal, and replanting activities are conducted within established federal, state and local regulatory frameworks governing agriculture, environmental protection and business operations. The primary supplier operates as a legally registered business in good standing and has confirmed compliance with all applicable legal requirements. Based on the regulatory framework, supplier verification and documented evidence, there is no indication of systemic non-compliance with applicable legislation. |
| Risk Rating                 | Low Risk                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

| United States<br>California | Indicator                                                                                                                                                                                                                                                                                                                                                                            |
|-----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.1.2                       | Legal ownership of land and resource use rights shall be respected.                                                                                                                                                                                                                                                                                                                  |
| Supply Base Verifiers       | <ul style="list-style-type: none"> <li>• County assessor records</li> <li>• GIS parcel records</li> <li>• Property ownership documentation</li> </ul>                                                                                                                                                                                                                                |
| Risk Rating justification   | Feedstock is sourced exclusively from privately owned agricultural land with clearly documented ownership. County assessor records, parcel maps and land ownership documentation confirm legal ownership and agricultural zoning for the supply parcels. There are no known disputes regarding land tenure or ownership within the supply base, resulting in a low risk designation. |
| Risk Rating                 | Low Risk                                                                                                                                                                                                                                                                                                                                                                             |

| United States<br>California | Indicator                                                                                                                                            |
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| 1.1.3                       | Feedstock shall be legally harvested, supplied and produced, including in compliance with CITES, EUTR and other applicable legal trade requirements. |

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| <b>Supply Base Verifiers</b>     | <ul style="list-style-type: none"> <li>• Species identification</li> <li>• Supplier declaration</li> <li>• California agricultural regulatory framework</li> </ul>                                                                                                                                                                                                                                                                                             |
| <b>Risk Rating justification</b> | Feedstock consists of end-of-life almond trees removed during normal orchard replacement on privately owned agricultural land. The material is generated through routine agricultural operations rather than forest harvesting. Almond ( <i>Prunus dulcis</i> ) is not listed under CITES, and no timber harvesting permits or forest harvest authorizations are required for orchard removal. Consequently, the risk of illegal harvesting is considered low. |
| <b>Risk Rating</b>               | Low Risk                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

| United States<br>California      | Indicator                                                                                                                                                                                                                                                                                                                                                                                               |
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| <b>1.1.4</b>                     | Payments for harvest rights and feedstock, including duties, relevant royalties and taxes related to timber harvesting shall be complete and up-to-date.                                                                                                                                                                                                                                                |
| <b>Supply Base Verifiers</b>     | <ul style="list-style-type: none"> <li>• Land ownership documentation</li> <li>• Supplier declaration</li> </ul>                                                                                                                                                                                                                                                                                        |
| <b>Risk Rating justification</b> | The biomass originates from privately owned agricultural orchards where the landowner controls both the land and the feedstock. No timber concessions, harvesting licenses, stumpage fees or forest royalties apply because the material is derived from agricultural orchard removal rather than forest operations. Therefore, the risk associated with payments for harvest rights is not applicable. |
| <b>Risk Rating</b>               | Low Risk                                                                                                                                                                                                                                                                                                                                                                                                |

| United States<br>California      | Indicator                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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| <b>1.1.5</b>                     | There shall be adequate protection of the Supply Base from unauthorised and illegal activities, such as illegal logging, mining, and encroachment.                                                                                                                                                                                                                                                                                                       |
| <b>Supply Base Verifiers</b>     | <ul style="list-style-type: none"> <li>• Supplier declaration</li> <li>• California agricultural regulations</li> <li>• County regulatory oversight</li> </ul>                                                                                                                                                                                                                                                                                           |
| <b>Risk Rating justification</b> | The supply base is located on privately owned agricultural land subject to comprehensive regulatory oversight by California state agencies and county authorities. Agricultural land management, pesticide use, environmental compliance and related activities are regulated and enforced through established legal frameworks. Given the strong regulatory environment, documented ownership and supplier verification, the risk of illegal activities |

|                    |                                              |
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|                    | affecting the supply base is considered low. |
| <b>Risk Rating</b> | Low Risk                                     |

| United States<br>California      | Indicator                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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| <b>2.1.1</b>                     | Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Supply Base Verifiers</b>     | <ul style="list-style-type: none"> <li>• Agricultural zoning/land-use records</li> <li>• Historical aerial imagery</li> <li>• CNDDDB screening images/records</li> <li>• Supplier declaration</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Risk Rating justification</b> | <p><b>Risk Rating Justification</b></p> <p>Commercial almond orchards may contain or be located near key species, sensitive habitats, ecosystems, or areas of High Conservation Value (HCV). Accordingly, this indicator is assessed as <b>Specified Risk</b> and requires parcel-level screening.</p> <p>Before sourcing, each APN shall be screened using:</p> <ul style="list-style-type: none"> <li>• applicable agricultural zoning and land-use records;</li> <li>• historical aerial imagery to confirm long-term agricultural use; and</li> <li>• California Natural Diversity Database (CNDDDB) mapping to identify documented sensitive species, habitats, natural communities, or other biodiversity concerns.</li> </ul> <p>The screening and its results shall be documented for each sourcing area.</p> <p><b>Mitigation Measures</b></p> <p>All sourcing APNs must complete the required desktop screening before material is accepted. Any potential biodiversity concern identified through the screening shall be flagged for further evaluation under Indicators 2.1.2 and 2.1.3.</p> |
| <b>Risk Rating</b>               | Specified Risk                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

| United States<br>California  | Indicator                                                                                                                                                                                               |
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| <b>2.1.2</b>                 | Threats to and impacts on the identified key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified and evaluated. |
| <b>Supply Base Verifiers</b> | <p>Agricultural zoning/land-use records</p> <p>Historical aerial imagery</p> <p>CNDDDB screening images/records</p> <p>Supplier declaration</p>                                                         |

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|                                  | Documented evaluation of screening results                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Risk Rating justification</b> | <p>Potential threats to key species, sensitive habitats, ecosystems, or biodiversity-related HCVs are evaluated through the parcel-level screening completed under Indicator 2.1.1.</p> <p>For each sourcing APN, AllMade reviews agricultural zoning and land-use records, historical aerial imagery, and CNDDDB mapping to determine whether the parcel or sourcing activity presents an identified biodiversity concern. Where the screening confirms long-term agricultural use and does not identify a biodiversity concern requiring further action, the risk is considered mitigated through the documented assessment.</p> <p>If the screening identifies a potential concern or uncertainty, the matter shall be further evaluated before sourcing proceeds.</p> <p><b>Mitigation Measures</b></p> <p>AllMade shall document its evaluation of the screening results for each sourcing area. Any identified potential biodiversity concern or uncertainty shall be escalated for further assessment and, where appropriate, consultation with a suitably qualified expert.</p> |
| <b>Risk Rating</b>               | Specified Risk                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

| United States<br>California      | Indicator                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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| <b>2.1.3</b>                     | Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Supply Base Verifiers</b>     | <ul style="list-style-type: none"> <li>• Screening and evaluation records from Indicators 2.1.1 and 2.1.</li> <li>• Supplier declaration</li> <li>• Written mitigation instructions to the grower, where applicable</li> <li>• Expert input, where applicable</li> <li>• Photographs, records, or other evidence demonstrating implementation of required mitigation measures</li> </ul>                                                                                                                                                                                                                                                                                                                                                               |
| <b>Risk Rating justification</b> | <p>The risk that orchard removal could adversely affect an identified key species, sensitive habitat, ecosystem, or biodiversity-related HCV is addressed through the screening and evaluation required under Indicators 2.1.1 and 2.1.2.</p> <p>If the screening identifies a biodiversity concern that could be affected by orchard removal, AllMade shall inform the grower and establish specific measures necessary to avoid or mitigate the potential impact. Where specialist knowledge is required, the appropriate measures shall be developed in consultation with a suitably qualified expert.</p> <p>Sourcing from the affected area shall proceed only after the required mitigation measures have been communicated and implemented.</p> |

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|                    | <b>Mitigation Measures</b><br>Where a biodiversity concern is identified: <ol style="list-style-type: none"> <li>1. AllMade shall inform the grower of the identified concern.</li> <li>2. AllMade shall determine appropriate mitigation measures, consulting a suitably qualified expert where necessary.</li> <li>3. The grower shall be instructed on the measures required during orchard removal.</li> <li>4. AllMade shall retain evidence demonstrating that the required measures were followed.</li> </ol> |
| <b>Risk Rating</b> | Specified Risk                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

| United States<br>California      | Indicator                                                                                                                                                                                                                                                                                                                                                                                                                      |
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| <b>2.2.1</b>                     | 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.                                                                                                                                                                                                     |
| <b>Supply Base Verifiers</b>     | <ul style="list-style-type: none"> <li>• Google Earth historical imagery</li> <li>• County GIS parcel records</li> <li>• Land ownership records</li> </ul>                                                                                                                                                                                                                                                                     |
| <b>Risk Rating justification</b> | Historical aerial imagery and parcel records confirm that the verified supply parcels were established as agricultural orchards well before January 2008 and have remained in continuous agricultural production. No evidence of conversion from forest or other natural ecosystems was identified. Accordingly, feedstock is sourced from existing agricultural land and presents a low risk of unacceptable land-use change. |
| <b>Risk Rating</b>               | Low Risk                                                                                                                                                                                                                                                                                                                                                                                                                       |

| United States<br>California      | Indicator                                                                                                      |
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| <b>2.2.2</b>                     | Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced. |
| <b>Supply Base Verifiers</b>     |                                                                                                                |
| <b>Risk Rating justification</b> | Non-applicable as defined by instruction document                                                              |
| <b>Risk Rating</b>               | Low Risk                                                                                                       |

| United States | Indicator |
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| California                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| 2.2.3                     | Soil quality in the Supply Base shall be maintained or enhanced                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Supply Base Verifiers     | <ul style="list-style-type: none"> <li>• Grower confirmation of intended post-removal land use.</li> <li>• If replanted: photographs confirming establishment of the subsequent orchard or crop.</li> <li>• If not replanted: pre- and post-removal soil analysis comparing relevant soil-quality parameters.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Risk Rating justification | <p>Orchard removal involves heavy equipment, tree and stump/root removal, and associated soil disturbance. If not appropriately managed, these activities have the potential to adversely affect soil quality.</p> <p>Prior to accepting material from an orchard removal, AllMade will confirm with the grower whether the land will be replanted with almonds or another agricultural crop.</p> <p><b>Where the land will be replanted:</b> Successful establishment of the subsequent crop will be used as evidence that the soil remains capable of supporting productive agricultural use and that soil quality has not been materially degraded by the orchard removal.</p> <p><b>Where the land will not be replanted:</b> AllMade will obtain representative soil testing before orchard removal and again following removal. Pre- and post-removal results will be compared to determine whether the removal activity resulted in material degradation of soil quality.</p> <p><b>Mitigation:</b> Orchard removal contractors will be instructed to conduct removal in a manner that minimizes unnecessary soil disturbance.</p> |
| Risk Rating               | Specified Risk                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

| United States<br>California | Indicator                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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| 2.2.4                       | Where the removal of harvest forest residues and/or stumps occurs, this shall not lead to irreversible negative impacts to the ecosystem.                                                                                                                                                                                                                                                                                                                                                                                   |
| Supply Base Verifiers       | Published Almond Board of California, University of California, and USDA NRCS guidance demonstrating that stump/root removal is an established component of normal orchard removal and redevelopment.                                                                                                                                                                                                                                                                                                                       |
| Risk Rating justification   | <p>The Supply Base consists of established commercial almond orchards that are periodically removed and replanted as part of the normal agricultural production cycle. Published California guidance recognizes orchard removal, including tree pulling, root removal, ripping, discing and subsequent replanting, as normal orchard redevelopment activities.</p> <p>The Almond Board of California describes orchard removal and replanting as part of the normal almond orchard lifecycle and promotes Whole Orchard</p> |

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|                    | <p>Recycling as an orchard-removal practice that can improve soil organic matter, water-holding capacity and subsequent orchard performance. University of California guidance similarly describes tree pulling, root removal, ripping and discing as normal steps associated with orchard removal and preparation for replanting. USDA NRCS also recognizes mechanical orchard removal and treatment of orchard woody residues as an established California agricultural practice.</p> <p>These sources demonstrate that stump and root removal, when conducted as part of normal orchard redevelopment, is an established agricultural activity and is compatible with continued productive use of the land. The routine replanting of orchards following removal further demonstrates that the impacts associated with removal are temporary and recoverable rather than irreversible.</p> <p>Accordingly, the risk that stump/root removal associated with almond orchard replacement will result in irreversible negative impacts to the ecosystem is assessed as <b>Low Risk</b>.</p> |
| <b>Risk Rating</b> | Low Risk                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

| United States<br>California      | Indicator                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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| <b>2.2.5</b>                     | Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Supply Base Verifiers</b>     | <p>Photographic or other documented evidence demonstrating that the supplying orchard uses drip or micro-irrigation.</p> <p>The supplier declaration shall also confirm the use of drip or micro-irrigation at the supplying orchards.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Risk Rating justification</b> | <p>Water availability and groundwater use are recognized concerns in California agriculture, including almond production. Accordingly, AllMade Materials designates this indicator as Specified Risk.</p> <p>The Almond Board of California identifies irrigation efficiency as an important component of sustainable almond production. Its California Almond Sustainability Program specifically evaluates orchard irrigation systems, including drip and micro-irrigation, and identifies micro-irrigation as an important water-conservation practice. California Department of Water Resources similarly identifies agricultural water-use efficiency as an important component of responsible water management in California.</p> <p><b>Mitigation Measure</b><br/>Supplying orchards shall use drip or micro-irrigation systems as a water-conservation practice.</p> <p>Almond Board of California — California Almond Sustainability Program: Irrigation Management Module — explicitly identifies <b>drip, micro-sprinkler, flood/furrow and sprinkler</b> as irrigation-system types evaluated under the</p> |

|                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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|                    | <p>sustainability program.</p> <p>Almond Board of California — Almond Sustainability / Water Efficiency — explains that micro-irrigation applies water where the crop needs it and can reduce runoff and waste while allowing more precise irrigation.</p> <p>California Department of Water Resources — Agricultural Water Use Efficiency — establishes agricultural water-use efficiency as a recognized California water-management objective.</p> |
| <b>Risk Rating</b> | Specified Risk                                                                                                                                                                                                                                                                                                                                                                                                                                        |

| United States<br>California      | Indicator                                                                                                                                                                                                                                                                                                                                                                      |
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| <b>2.2.6</b>                     | Air emissions shall comply with national legislation or in the absence of national legislation with industry best practice.                                                                                                                                                                                                                                                    |
| <b>Supply Base Verifiers</b>     | <ul style="list-style-type: none"> <li>• Applicable air quality regulations</li> <li>• Supplier declaration</li> </ul>                                                                                                                                                                                                                                                         |
| <b>Risk Rating justification</b> | Field operations, orchard removal, processing activities and transportation associated with the supply base are regulated by the San Joaquin Valley Air Pollution Control District and other applicable California air quality regulations. Compliance with these requirements is mandatory for commercial agricultural operations, resulting in a low risk of non-compliance. |
| <b>Risk Rating</b>               | Low Risk                                                                                                                                                                                                                                                                                                                                                                       |

| United States<br>California      | Indicator                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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| <b>2.2.7</b>                     | Pesticides shall only be used as part of an Integrated Pest Management (IPM) plan in compliance with national legislation, chemical safety data sheets and industry best practice. Banned pesticides shall not be used.                                                                                                                                                                                                                                                                                         |
| <b>Supply Base Verifiers</b>     | <ul style="list-style-type: none"> <li>• Supplier declaration</li> <li>• California Department of Pesticide Regulation</li> <li>• Integrated Pest Management requirements</li> </ul>                                                                                                                                                                                                                                                                                                                            |
| <b>Risk Rating justification</b> | Commercial almond production in California is regulated by the California Department of Pesticide Regulation and the Kern County Agricultural Commissioner. Any pesticide use within the supply base must comply with applicable legislation, product label requirements and Integrated Pest Management (IPM) principles. Because feedstock consists of end-of-life orchard trees and pesticide use is subject to strict regulatory oversight, the risk associated with pesticide management is considered low. |
| <b>Risk Rating</b>               | Specified Risk                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

| United States<br>California      | Indicator                                                            |
|----------------------------------|----------------------------------------------------------------------|
| <b>2.2.8</b>                     | Waste shall be disposed of in an environmentally appropriate manner. |
| <b>Supply Base Verifiers</b>     | Non-applicable as defined by Instruction Document 1A                 |
| <b>Risk Rating justification</b> | Non-applicable as defined by Instruction Document 1A                 |
| <b>Risk Rating</b>               | Low Risk                                                             |

| United States<br>California      | Indicator                                                                                                                             |
|----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------|
| <b>2.2.9</b>                     | Harvesting levels shall be justified as to how they can be sustained with reference to inventory and growth data for the Supply Base. |
| <b>Supply Base Verifiers</b>     | Non-applicable as defined by Instruction Document 1A                                                                                  |
| <b>Risk Rating justification</b> | Non-applicable as defined by instruction document                                                                                     |
| <b>Risk Rating</b>               | Low Risk                                                                                                                              |

| United States<br>California      | Indicator                                            |
|----------------------------------|------------------------------------------------------|
| <b>2.2.10</b>                    | Harvested areas shall be regenerated                 |
| <b>Supply Base Verifiers</b>     | Non-applicable as defined by Instruction Document 1A |
| <b>Risk Rating justification</b> | Non-applicable as defined by instruction document    |
| <b>Risk Rating</b>               | Low Risk                                             |

| United States<br>California      | Indicator                                                                            |
|----------------------------------|--------------------------------------------------------------------------------------|
| <b>2.2.11</b>                    | The impacts of natural processes such as fires, pests and diseases shall be managed. |
| <b>Supply Base Verifiers</b>     | Non-applicable as defined by Instruction Document 1A                                 |
| <b>Risk Rating justification</b> | Non-applicable as defined by instruction document                                    |
| <b>Risk Rating</b>               | Low Risk                                                                             |

| United States<br>California  | Indicator                                                                                                                  |
|------------------------------|----------------------------------------------------------------------------------------------------------------------------|
| <b>2.2.12</b>                | Genetically modified trees shall not be used.                                                                              |
| <b>Supply Base Verifiers</b> | <ul style="list-style-type: none"> <li>• Supplier declaration</li> <li>• Commercial almond production practices</li> </ul> |

|                                  |                                                                                                                                                                                                                                                                                                                     |
|----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Risk Rating justification</b> | Commercial almond orchards in California do not utilize genetically modified almond tree varieties. Feedstock originates exclusively from conventional almond orchards undergoing routine replacement. As genetically modified trees are not present within the supply base, the associated risk is considered low. |
| <b>Risk Rating</b>               | Low Risk                                                                                                                                                                                                                                                                                                            |

| United States<br>California      | Indicator                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>3.1.1</b>                     | 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. |
| <b>Supply Base Verifiers</b>     | <ul style="list-style-type: none"> <li>• UNFCCC reporting framework</li> <li>• Historical land-use verification</li> <li>• Supplier declaration</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Risk Rating justification</b> | The supply base is located entirely within the United States, which maintains national greenhouse gas accounting under the United Nations Framework Convention on Climate Change (UNFCCC). Feedstock originates from existing agricultural orchards rather than land conversion or deforestation activities, and biomass is generated through routine orchard replacement. Based on the applicable national reporting framework and the absence of land-use change within the supply base, this indicator is considered compliant.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Risk Rating</b>               | Specified Risk                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

| United States<br>California | Indicator                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>3.2.1</b>                | All feedstock sourcing shall be consistent with either of these two options: Option A. Feedstock may be sourced from Supply Bases where an assessment of the Supply Base shows that the forest carbon stocks are stable or increasing, or Option B. Feedstock may be sourced, if the assessment shows that the forest carbon stocks are declining in the Supply Base, provided that the decline is due to natural processes (fire, pests etc.), and sourcing of feedstock has the aim to recover feedstock that would |

|                                  |                                                      |
|----------------------------------|------------------------------------------------------|
|                                  | otherwise be lost or to assist regeneration.         |
| <b>Supply Base Verifiers</b>     | Non-applicable as defined by Instruction Document 1A |
| <b>Risk Rating justification</b> | Non-applicable as defined by Instruction Document 1A |
| <b>Risk Rating</b>               | Low Risk                                             |

| United States<br>California      | Indicator                                                                                                                                                                                                    |
|----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>3.2.2</b>                     | Primary feedstock shall not be sourced from forest areas where site productivity is low and, according to local definitions or norms, the areas are classified as low-productive or difficult to regenerate. |
| <b>Supply Base Verifiers</b>     | Non-applicable as defined by Instruction Document 1A                                                                                                                                                         |
| <b>Risk Rating justification</b> | Non-applicable as defined by Instruction Document 1A                                                                                                                                                         |
| <b>Risk Rating</b>               | Low Risk                                                                                                                                                                                                     |

| United States<br>California      | Indicator                                                                                                                                                                                                                 |
|----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>3.2.3</b>                     | feedstock shall not be sourced from forest areas in the Supply Base which, according to local definitions or norms, are classified as having combined attributes of high carbon stocks and high conservation value (HCV). |
| <b>Supply Base Verifiers</b>     | Non-applicable as defined by Instruction Document 1A                                                                                                                                                                      |
| <b>Risk Rating justification</b> | Non-applicable as defined by Instruction Document 1A                                                                                                                                                                      |
| <b>Risk Rating</b>               | Low Risk                                                                                                                                                                                                                  |

| United States<br>California      | Indicator                                                                                                                                                                                                        |
|----------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>3.3.1</b>                     | Feedstock sourcing shall be in compliance with the principles of cascading use, high quality stem wood shall not be used as feedstock if it is in substantial demand for long-lived products in the Supply Base. |
| <b>Supply Base Verifiers</b>     | Non-applicable as defined by Instruction Document 1A                                                                                                                                                             |
| <b>Risk Rating justification</b> | Non-applicable as defined by Instruction Document 1A                                                                                                                                                             |
| <b>Risk Rating</b>               | Low Risk                                                                                                                                                                                                         |

| United States<br>California  | Indicator                                                                                                                    |
|------------------------------|------------------------------------------------------------------------------------------------------------------------------|
| <b>4.1.1</b>                 | Freedom of association and the right to collective bargaining shall be respected in the workplace.                           |
| <b>Supply Base Verifiers</b> | <ul style="list-style-type: none"> <li>• Supplier declaration</li> <li>• Federal and California labor legislation</li> </ul> |

|                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|----------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Risk Rating justification</b> | Workers employed within the supply base are protected by comprehensive federal and California labor legislation, including the National Labor Relations Act and the California Agricultural Labor Relations Act. These laws protect workers' rights to freedom of association and collective bargaining, supported by established enforcement mechanisms. Based on the applicable legal framework and supplier confirmation of compliance, the risk is considered low. |
| <b>Risk Rating</b>               | Low Risk                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

| United States<br>California      | Indicator                                                                                                                                                                                                                                                                                                                                                                                         |
|----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>4.1.2</b>                     | Forced or compulsory labour shall not be used.                                                                                                                                                                                                                                                                                                                                                    |
| <b>Supply Base Verifiers</b>     | <ul style="list-style-type: none"> <li>• Supplier declaration</li> <li>• Federal labor laws</li> <li>• California labor regulations</li> </ul>                                                                                                                                                                                                                                                    |
| <b>Risk Rating justification</b> | Forced and compulsory labor are prohibited under United States federal law and California labor legislation. Agricultural employers are subject to regulatory oversight and enforcement by the U.S. Department of Labor and California authorities. The supplier has confirmed compliance with applicable labor laws, and no evidence of forced labor has been identified within the supply base. |
| <b>Risk Rating</b>               | Low Risk                                                                                                                                                                                                                                                                                                                                                                                          |

| United States<br>California      | Indicator                                                                                                                                                                                                                                                                                                                                                                                                      |
|----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>4.1.3</b>                     | Child labour shall not be used.                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Supply Base Verifiers</b>     | <ul style="list-style-type: none"> <li>• Supplier declaration</li> <li>• Federal and California child labor regulations</li> </ul>                                                                                                                                                                                                                                                                             |
| <b>Risk Rating justification</b> | Employment of minors in agriculture is regulated under federal and California labor legislation, including restrictions on hazardous work and minimum age requirements. Commercial agricultural employers are subject to regular legal oversight and enforcement. Based on the regulatory framework and supplier confirmation of compliance, the risk of child labor within the supply base is considered low. |
| <b>Risk Rating</b>               | Low Risk                                                                                                                                                                                                                                                                                                                                                                                                       |

| United States<br>California      | Indicator                                                                                                                                                                                                                                                                                                                                                                                               |
|----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>4.1.4</b>                     | Workers shall not be discriminated in hiring, remuneration, access to training, promotion, termination or retirement.                                                                                                                                                                                                                                                                                   |
| <b>Supply Base Verifiers</b>     | <ul style="list-style-type: none"> <li>• Supplier declaration</li> <li>• Federal and California anti-discrimination legislation</li> </ul>                                                                                                                                                                                                                                                              |
| <b>Risk Rating justification</b> | Workers within the supply base are protected by comprehensive federal and California anti-discrimination legislation covering employment practices. The supplier operates within this legal framework and has confirmed compliance with applicable employment laws. Given the strength of the regulatory environment and enforcement mechanisms, the risk of unlawful discrimination is considered low. |
| <b>Risk Rating</b>               | Low Risk                                                                                                                                                                                                                                                                                                                                                                                                |

| United States<br>California      | Indicator                                                                                                                                                                                                                                                                                                                                                                                               |
|----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>4.1.5</b>                     | 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                                                                                                                                                                                                                                                   |
| <b>Supply Base Verifiers</b>     | <ul style="list-style-type: none"> <li>• Supplier declaration</li> <li>• California wage regulations</li> </ul>                                                                                                                                                                                                                                                                                         |
| <b>Risk Rating justification</b> | Agricultural workers within the supply base are subject to California minimum wage legislation, agricultural overtime requirements and other employment standards enforced by the California Department of Industrial Relations. The supplier has confirmed compliance with applicable wage legislation. Accordingly, the risk of workers receiving less than the legal minimum wage is considered low. |
| <b>Risk Rating</b>               | Low Risk                                                                                                                                                                                                                                                                                                                                                                                                |

| United States<br>California      | Indicator                                                                                                                                             |
|----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>4.1.6</b>                     | Working hours shall comply with legal requirements.                                                                                                   |
| <b>Supply Base Verifiers</b>     | <ul style="list-style-type: none"> <li>• Supplier declaration</li> <li>• Federal and California labor regulations</li> </ul>                          |
| <b>Risk Rating justification</b> | Working hours for agricultural employees are regulated by both federal and California labor legislation, including maximum working hours and overtime |

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|                    | requirements. These regulations are supported by established enforcement mechanisms, and the supplier has confirmed compliance with applicable legal requirements. The risk associated with excessive working hours is therefore considered low. |
| <b>Risk Rating</b> | Low Risk                                                                                                                                                                                                                                         |

| United States<br>California      | Indicator                                                                                                                                                                                                                                                                                                                                                                                        |
|----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>4.1.7</b>                     | Workers shall have access to health care provisions, sickness benefits, retirement benefits, invalidity benefits, death benefits, and workers' compensation                                                                                                                                                                                                                                      |
| <b>Supply Base Verifiers</b>     | <ul style="list-style-type: none"> <li>• Supplier declaration</li> <li>• Applicable labor legislation</li> </ul>                                                                                                                                                                                                                                                                                 |
| <b>Risk Rating justification</b> | Workers employed within the supply base are entitled to statutory protections including workers' compensation, workplace health and safety requirements and unemployment insurance under United States and California law. These protections are mandatory and supported by regulatory oversight. Based on the applicable legal framework and supplier confirmation, the associated risk is low. |
| <b>Risk Rating</b>               | Low Risk                                                                                                                                                                                                                                                                                                                                                                                         |

| United States<br>California      | Indicator                                                                                                                                                                                                                                                                                                                                                                                                                   |
|----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>4.1.8</b>                     | 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.                                                                                                                                                                                                                                                       |
| <b>Supply Base Verifiers</b>     | <ul style="list-style-type: none"> <li>• Supplier declaration</li> <li>• Cal/OSHA regulations</li> </ul>                                                                                                                                                                                                                                                                                                                    |
| <b>Risk Rating justification</b> | California occupational health and safety regulations require training appropriate to agricultural operations, heavy equipment use and workplace hazards. Orchard removal and biomass handling activities are conducted within this regulatory framework, and the supplier has confirmed compliance with applicable training requirements. The risk associated with inadequate worker training is therefore considered low. |
| <b>Risk Rating</b>               | Low Risk                                                                                                                                                                                                                                                                                                                                                                                                                    |

| United States<br>California | Indicator                                                                            |
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| <b>4.1.9</b>                | Mechanisms shall be in place for resolving grievances and disputes in the workplace. |

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| <b>Supply Base Verifiers</b>     | <ul style="list-style-type: none"> <li>• Supplier declaration</li> <li>• Labor legislation</li> <li>• Internal grievance procedures</li> </ul>                                                                                                                                                                                                                                                                                 |
| <b>Risk Rating justification</b> | Workers within the supply base have access to grievance mechanisms through both employer procedures and federal and state labor authorities. The supplier has confirmed the existence of internal processes for addressing employee concerns, while established legal frameworks provide additional external avenues for complaints. Consequently, the risk associated with inadequate grievance mechanisms is considered low. |
| <b>Risk Rating</b>               | Low Risk                                                                                                                                                                                                                                                                                                                                                                                                                       |

| United States<br>California      | Indicator                                                                                                                                                                                                                                                                                                                                                                                     |
|----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>4.1.10</b>                    | Safeguards shall be put in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures.                                                                                                                                                                                                                                           |
| <b>Supply Base Verifiers</b>     | <ul style="list-style-type: none"> <li>• Supplier declaration</li> <li>• Cal/OSHA regulations</li> <li>• OSHA requirements</li> </ul>                                                                                                                                                                                                                                                         |
| <b>Risk Rating justification</b> | Agricultural operations, orchard removal, biomass processing and transportation activities are regulated under Cal/OSHA and applicable federal occupational safety legislation. These regulations establish requirements for equipment operation, hazard management and workplace safety. The supplier has confirmed compliance with these requirements, resulting in a low risk designation. |
| <b>Risk Rating</b>               | Low Risk                                                                                                                                                                                                                                                                                                                                                                                      |

| United States<br>California      | Indicator                                                                                                                                                                                                                 |
|----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>4.2.1</b>                     | Negative social and community impacts shall be identified and avoided.                                                                                                                                                    |
| <b>Supply Base Verifiers</b>     | <ul style="list-style-type: none"> <li>• Land ownership records</li> <li>• Agricultural zoning</li> <li>• Supplier declaration</li> </ul>                                                                                 |
| <b>Risk Rating justification</b> | The supply base consists of privately owned commercial almond orchards undergoing routine orchard replacement on existing agricultural land. Biomass sourcing does not require land conversion, restrict public access or |

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|                    | displace local communities. Transportation and operational activities remain subject to applicable local environmental and land-use regulations. Based on the nature of the supply base and regulatory oversight, the risk of significant negative social impacts is considered low. |
| <b>Risk Rating</b> | Low Risk                                                                                                                                                                                                                                                                             |

| United States<br>California      | Indicator                                                                                                                                                                                                                                                                                                                                                                                                                            |
|----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>4.2.2</b>                     | Feedstock sourcing shall positively contribute to the local economy, including employment.                                                                                                                                                                                                                                                                                                                                           |
| <b>Supply Base Verifiers</b>     | <ul style="list-style-type: none"> <li>• Supplier declaration</li> <li>• Local contractor engagement</li> </ul>                                                                                                                                                                                                                                                                                                                      |
| <b>Risk Rating justification</b> | Biomass sourcing supports local agricultural contractors, equipment operators, trucking companies and associated service providers involved in orchard removal and transportation. Routine orchard replacement also supports continued agricultural productivity through replanting. As a result, feedstock sourcing provides a positive economic contribution to the local agricultural economy while presenting a low social risk. |
| <b>Risk Rating</b>               | Low Risk                                                                                                                                                                                                                                                                                                                                                                                                                             |

| United States<br>California      | Indicator                                                                                                                                                                                                                                                                                                                                                                                                      |
|----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>4.2.3</b>                     | Food, water supply or high conservation values (HCV) that are essential for the fulfilment of basic needs of communities shall be maintained or enhanced                                                                                                                                                                                                                                                       |
| <b>Supply Base Verifiers</b>     | <ul style="list-style-type: none"> <li>• Historical land-use verification</li> <li>• Agricultural land classification</li> <li>• California water regulations</li> </ul>                                                                                                                                                                                                                                       |
| <b>Risk Rating justification</b> | The supply base remains in continuous agricultural production following orchard replacement and replanting. Biomass sourcing does not reduce food production capacity or adversely affect community water supplies, while water use remains regulated under California water management frameworks. Based on continuous agricultural land use and applicable regulatory oversight, the risk is considered low. |
| <b>Risk Rating</b>               | Low Risk                                                                                                                                                                                                                                                                                                                                                                                                       |

| United States<br>California | Indicator |
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| <b>4.2.4</b>                     | Legal, customary, and traditional tenure and use rights of Indigenous Peoples and local communities related to the Supply Base shall be identified, documented, and respected.                                                                                                                                                                                               |
| <b>Supply Base Verifiers</b>     | <ul style="list-style-type: none"> <li>• County parcel records</li> <li>• Agricultural zoning</li> <li>• Supplier declaration</li> </ul>                                                                                                                                                                                                                                     |
| <b>Risk Rating justification</b> | Feedstock is sourced exclusively from privately owned agricultural land with clearly documented ownership and established legal property rights. No Indigenous or customary land tenure rights have been identified within the supply base, and biomass sourcing does not affect community access to land or resources. Consequently, the associated risk is considered low. |
| <b>Risk Rating</b>               | Low Risk                                                                                                                                                                                                                                                                                                                                                                     |

| United States<br>California      | Indicator                                                                                                                                                                                                                                                                                                                                                                      |
|----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>4.2.5</b>                     | Mechanisms shall be in place for resolving grievances and disputes relating to tenure and use rights of the forest and other land management practices.                                                                                                                                                                                                                        |
| <b>Supply Base Verifiers</b>     | <ul style="list-style-type: none"> <li>• Supplier declaration</li> <li>• County property records</li> <li>• Complaint procedure</li> </ul>                                                                                                                                                                                                                                     |
| <b>Risk Rating justification</b> | The supply base operates on privately owned agricultural land where property rights are clearly defined under California law. Stakeholders may raise concerns directly with either AllMade Materials or the supplier, and established legal mechanisms also exist to resolve any land-use or property disputes. Based on these existing processes, the risk is considered low. |
| <b>Risk Rating</b>               | Low Risk                                                                                                                                                                                                                                                                                                                                                                       |

| United States<br>California      | Indicator                                                                                                                                                                                                                                                   |
|----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>4.2.6</b>                     | Where Indigenous Peoples' rights are identified in the Supply Base, and Free Prior and Informed Consent (FPIC) has not been achieved for the proposed and planned activities, a consultation and, if required, accommodation process shall be put in place. |
| <b>Supply Base Verifiers</b>     | <ul style="list-style-type: none"> <li>• County ownership records</li> <li>• Agricultural land classification</li> </ul>                                                                                                                                    |
| <b>Risk Rating justification</b> | The verified supply base is located on privately owned agricultural land and no Indigenous land rights or customary tenure claims have been identified.                                                                                                     |

|                    |                                                                                                                                                                                                         |
|--------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                    | Because biomass sourcing does not occur on Indigenous lands or affect Indigenous rights, the requirement for Free, Prior and Informed Consent (FPIC) is not applicable and presents a low overall risk. |
| <b>Risk Rating</b> | Low Risk                                                                                                                                                                                                |

| United States<br>California      | Indicator                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|----------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>4.2.7</b>                     | Designated cultural heritage sites shall be preserved.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Supply Base Verifiers</b>     | <ul style="list-style-type: none"> <li>• Agricultural land classification</li> <li>• County planning records</li> <li>• Supplier declaration</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Risk Rating justification</b> | Feedstock is sourced from long-established commercial agricultural land where no designated cultural heritage or archaeological sites have been identified within the verified supply base. Agricultural operations remain subject to applicable federal and California cultural resource protection requirements, including procedures for ceasing work and notifying the appropriate authorities should previously unidentified resources be discovered. Based on the established land use and regulatory protections, the risk is considered low. |
| <b>Risk Rating</b>               | Low Risk                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

## Annex 2: EU RED Supply Base Evaluation

Not Applicable (RED II SBE not included)

## 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**

N/A

**Feedstock inspection and classification upon receipt**

N/A

**Supplier audit for processing residues and post-consumer feedstock**

N/A

## 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 - California**

### Article 29 (2): Soil quality and soil carbon

Biomass fuels produced from waste and residues derived not from forestry but from agricultural land shall be taken into account for the purposes referred to in points (a), (b) and (c) of the first subparagraph of paragraph 1 only where operators or national authorities have monitoring or management plans in place in order to address the impacts on soil quality and soil carbon. Information about how those impacts are monitored and managed shall be reported pursuant to Article 30(3).

#### (i) Impacts on soil quality

##### Step 1: Identification of applicable laws

|                                             |                                                                                                           |
|---------------------------------------------|-----------------------------------------------------------------------------------------------------------|
| Have the applicable law(s) been identified? | Yes                                                                                                       |
| List of applicable law(s)                   | U.S. and California agricultural land laws                                                                |
| Sources                                     | USDA/NRCS; California Department of Food and Agriculture; California State Water Resources Control Board. |

##### Step 2: Description of enforcement and monitoring by competent authorities

|                                                                          |                                                                                                                                                                           |
|--------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description of the practical implementation and monitoring of the law(s) | Applicable requirements are administered and enforced by federal, state, and local authorities. Feedstock is sourced from established commercial agricultural operations. |
| Sources                                                                  | USDA/NRCS; California Department of Food and Agriculture; California State Water Resources Control Board.                                                                 |
| Is the enforcement and monitoring ensured for the identified law(s)?     | Yes                                                                                                                                                                       |

##### Step 3: Evaluation of the effectiveness of the legal framework

|                                                   |                                                                                                                                              |
|---------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|
| Evaluation of the practical implementation of the | The applicable regulatory framework is implemented through established federal, state, and local agricultural and environmental authorities. |
|---------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|

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|----------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| law(s) and explanation for the evaluation                                                          |                                                                                                                                                                                                                                                                                                                                                                                                        |
| Sources                                                                                            | Step 3. Sources USDA/NRCS; California state and local regulatory authorities.                                                                                                                                                                                                                                                                                                                          |
| Is legal framework effective?                                                                      | Yes                                                                                                                                                                                                                                                                                                                                                                                                    |
| Step 4:<br><br>Detailed description of a management plan and monitoring at economic operator level | Prior to orchard removal, the grower is asked whether the land will be replanted with almonds or another agricultural crop. Where replanted, photographic evidence of replanting is retained. Where agricultural replanting is not planned, soil testing is conducted before and after removal using an appropriate USDA/ARS-based methodology to identify any material degradation in soil condition. |
| <b>(ii) Impact on soil carbon</b>                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                        |
| Step 1: Identification of applicable laws                                                          |                                                                                                                                                                                                                                                                                                                                                                                                        |
| Have the applicable law(s) been identified?                                                        | Yes                                                                                                                                                                                                                                                                                                                                                                                                    |
| List of applicable law(s)                                                                          | Applicable U.S. federal and California state requirements and programs relating to agricultural soil conservation and soil management.                                                                                                                                                                                                                                                                 |
| Sources                                                                                            | USDA/NRCS; USDA Agricultural Research Service; California Department of Food and Agriculture.                                                                                                                                                                                                                                                                                                          |
| Step 2: Description of enforcement and monitoring by competent authorities                         |                                                                                                                                                                                                                                                                                                                                                                                                        |
| Description of the practical implementation and monitoring of the law(s)                           | Soil conservation and agricultural land-management requirements are administered through established federal and state authorities and programs.                                                                                                                                                                                                                                                       |
| Sources                                                                                            | USDA/NRCS; USDA Agricultural Research Service; California Department of Food and Agriculture.                                                                                                                                                                                                                                                                                                          |
| Is enforcement and monitoring ensured for the identified law(s)?                                   | Yes                                                                                                                                                                                                                                                                                                                                                                                                    |
| Step 3: Evaluation of the effectiveness of the legal framework                                     |                                                                                                                                                                                                                                                                                                                                                                                                        |
| Evaluation of the practical implementation of the law and explanation for the evaluation           | The framework is supported by established agricultural conservation agencies, programs, technical guidance, and monitoring.                                                                                                                                                                                                                                                                            |
| Sources                                                                                            | USDA/NRCS; USDA Agricultural Research Service; California Department of Food and Agriculture.                                                                                                                                                                                                                                                                                                          |

|                                                                                                            |                                                                                                                                                                                                                                                                                                             |
|------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Is legal framework effective?                                                                              | Yes                                                                                                                                                                                                                                                                                                         |
| Step 4:<br><br>Detailed description of a management plan and monitoring applied at economic operator level | The same soil-management control is applied. Replanting is documented where the parcel remains in agricultural production. Where replanting is not planned, pre- and post-removal soil testing is used to identify any material deterioration in soil condition, including relevant soil-carbon indicators. |

#### Article 29 (3a): Protection of land with high biodiversity value

*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.*

|                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                         |
|---------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description of a management system process to meet the requirement. | Feedstock is accepted only from established commercial agricultural orchards. Each supply parcel is reviewed using zoning/land-use records and historical imagery to confirm agricultural use and identify any indication that the land was primary forest, other wooded land, or old-growth forest in or after January 2008. Any anomaly is escalated for further review before feedstock is accepted. |
|---------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

#### Article 29 (3b): Protection of land with high biodiversity value

*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, or 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;*

|                                                                     |                                                                                                                                                                                                                                                                                                                        |
|---------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description of a management system process to meet the requirement. | Each supply parcel is reviewed using zoning/land-use records, historical imagery, and relevant environmental databases, including CNDDB, to identify potential highly biodiverse forest or wooded land. Any identified concern is escalated for expert review and appropriate mitigation before feedstock is accepted. |
|---------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

#### Article 29 (3c): Protection of land with high biodiversity value

*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:*

(c) *areas designated:*

- (i) *by law or by the relevant competent authority for nature protection purposes; or*
- (ii) *for the protection of rare, threatened or endangered ecosystems or species recognised by international agreements or included in lists drawn up by intergovernmental organisations or the International Union for the Conservation of Nature, subject to their recognition in accordance with the first subparagraph of Article 30(4), unless*

#### **Article 29 (3d): Protection of land with high biodiversity value**

*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:*

(c) *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.*

Description of a management system process to meet the requirement.

Historical imagery and land-use records are reviewed to confirm established agricultural use and identify whether the parcel was highly biodiverse grassland in or after January 2008. Any anomaly is escalated for further review before feedstock is accepted.

#### **Article 29 (4a): Protection of land with high carbon stock**

*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;*

*This paragraph shall not apply if, at the time the raw material was obtained, the land had the same status as it had in January 2008.*

Description of a management system process to meet the requirement.

Historical imagery, land-use records, and relevant environmental information are reviewed to identify whether a supply parcel was peatland in January 2008. Feedstock is not accepted where the EU RED peatland criterion cannot be demonstrated.

#### **Article 29 (4b): Protection of land with high carbon stock**

*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:*

- (b) continuously forested areas, namely land spanning more than one hectare with trees higher than five metres and a canopy cover of more than 30 %, or trees able to reach those thresholds in situ;*

*This paragraph shall not apply if, at the time the raw material was obtained, the land had the same status as it had in January 2008.*

|                                                                     |                                                                                                                                                                                                                                                                                            |
|---------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description of a management system process to meet the requirement. | Historical imagery and land-use records are reviewed to establish the land status in January 2008 and confirm that the orchard does not represent conversion of continuously forested land prohibited by EU RED. Any anomaly is escalated for further review before feedstock is accepted. |
|---------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

#### Article 29 (4c): Protection of land with high carbon stock

*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:*

- (c) land spanning more than one hectare with trees higher than five metres and a canopy cover of between 10 % and 30 %, or trees able to reach those thresholds in situ, unless evidence is provided that the carbon stock of the area before and after conversion is such that, when the methodology laid down in Part C of Annex V is applied, the conditions laid down in paragraph 10 of this Article would be fulfilled.*

*This paragraph shall not apply if, at the time the raw material was obtained, the land had the same status as it had in January 2008.*

|                                                                     |                                                                                                                                                                                                                                                   |
|---------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description of a management system process to meet the requirement. | Historical imagery and land-use records are reviewed to establish the land status in January 2008 and identify any conversion of wooded land subject to this criterion. Any anomaly is escalated for further review before feedstock is accepted. |
|---------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

#### Article 29 (5): Protection of peatland

*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.*

|                                                                     |                                                                                                                                                                                                                                                                                         |
|---------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description of a management system process to meet the requirement. | Historical imagery, land-use records, and relevant environmental information are reviewed to identify whether a supply parcel was peatland in January 2008. Feedstock is not accepted where cultivation or harvesting would involve drainage contrary to the EU RED peatland criterion. |
|---------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

## 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).*