

PricewaterhouseCoopers LLP Evaluation of Solvay Biomass Energy, LLC Compliance with the SBP Framework: Public Summary Report

www.sustainablebiomasspartnership.org



Completed in accordance with the CB Public Summary Report Template Version 1.0

*For further information on the SBP Framework and to view the full set of documentation see
www.sustainablebiomasspartnership.org*

Document history

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1 Overview

CB Name and contact: PricewaterhouseCoopers LLP (PwC)
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Primary contact for SBP: Mike Harris, Practice Leader, 604-806-7711, mike.harris@ca.pwc.com

Report completion date: 30/May/2016

Report authors: Bruce Eaket, 604-806-7535, bruce.eaket@ca.pwc.com

Certificate Holder: Solvay Biomass Energy, LLC
252 Hickory Street, Quitman, MS 39355

Producer contact for SBP: Mark McKelvaine, Procurement Manager

Certified Supply Base: 98 counties in Mississippi (MS) and Alabama (AL) within the United States

SBP Certificate Code: SBP-03-01

Date of certificate issue: 11/May/2016

Date of certificate expiry: 10/May/2021

Indicate where the current audit fits within the certification cycle				
Main (Initial) Audit	First Surveillance Audit	Second Surveillance Audit	Third Surveillance Audit	Fourth Surveillance Audit
☒	☐	☐	☐	☐

2 Scope of the evaluation and SBP certificate

The Sustainable Biomass Partnership processes at the Quitman, MS wood pellet manufacturing plant and transportation to the Mobile, AL port.

3 Specific objectives

The primary objectives of the assessment were:

- Collecting assessment information;
- Confirming that information and comparing it to the Sustainable Biomass Partnership (SBP) Standards 1,2 and 3-5 (V1.0) (the “Standards”), the Client’s documented processes and public documents, and PwC’s requirements (the “Requirements”);
- Generating assessment findings; and
- Preparing the Assessment report.

4 SBP Standards utilised

4.1 SBP Standards utilised

The following SBP Standards were utilized:

- Standard 1: Feedstock Compliance Standard. Version 1.0. 26 March 2015
- Standard 2: Verification of SBP – Compliant Feedstock. Version 1.0. 26 March 2015
- Standard 4: Chain of Custody. Version 1.0. 26 March 2015
- Standard 5: Collection and Communication of Data. Version 1.0. 26 March 2015

The above Standards can be accessed or requested from SBP at the following website:

www.sustainablebiomasspartnership.org

4.2 SBP-endorsed Regional Risk Assessment

Not currently applicable to Solvay's Supply Base Area.

5 Description of Biomass Producer, Supply Base and Forest Management

5.1 Description of Biomass Producer

Solvay Biomass Energy, LLC (Solvay) operates a single site wood pellet manufacturing plant in Quitman, MS which includes the transportation of the finished pellets by truck to the Mobile, AL port. Solvay procures all of their fiber from primary and secondary sources and has an internal fiber procurement group that has responsibility for the implementation of voluntary standards including the Sustainable Forestry Initiative® (SFI) Fiber Sourcing and Chain of Custody (CoC) standards, the Programme for the Endorsement of Forest Certification (PEFC™) CoC Standards, the Forest Stewardship Council™ (FSC) CoC and Controlled Wood Standards and the SBP Standards. Solvay does not control any harvesting themselves, but the manager of the fiber procurement group does have personal business interests in a logging company and chipping/storage yard that supplies fiber to Solvay. For this supplier, Solvay has implemented a separate supplier monitoring procedure that addresses potential and/or perceived conflicts of interest. Solvay has used third-party consultants to assist with the implementation of the Standards.

The pellet plant purchases approximately 463,000 MT of which approximately 56% is secondary feedstock and 44% is primary feedstock. All of the input fiber and finished pellets are considered SBP Compliant. Solvay purchases all feedstock within the scope of their FSC controlled wood system, and since the FSC Controlled Wood Standard is SBP-approved, Solvay could potentially sell their pellets with an “SBP Controlled” claim. However, Solvay intends on using the “SBP Compliant” claim, therefore a Supply Base Evaluation (SBE) and the associated Risk Assessment are required.

5.2 Description of Biomass Producer’s Supply Base

Solvay purchases softwood and hardwood fiber from ninety eight (98) counties (12,608,004 hectares) in Mississippi (MS) and Alabama (AL) within the United States. These counties account for 73% of the entire states of AL and MS. Forests are the predominant land use in both states with forests occupying 65% of MS and almost 71% of AL respectively. Pine forests comprise the largest forest type (almost 48%) of the supply area’s forest followed by hardwood forests (39%). The pine/oak forest comprises 12% of the supply area’s forest type while about 1% of the forest is considered non-stocked. Over 65% of the supply area’s forests are managed as natural forests (8.1 MM hectares) while the remaining 35% of the supply area’s forests are artificially regenerated (4.5 MM hectares).

The forests are primarily owned by private landowners (92.4% or 11.6 MM hectares). The remaining forestlands (7.6%) are publicly owned with the federal government owning 518 M hectares (5.3%) and the state and local governments owning 437 M hectares (2.3%).

The forest products industry is a very large part of the area’s economy and is one of the top industries within both states generating \$13 billion in AL and \$11 billion in MS annually. In AL there are almost 50 wood products facilities and 75 paper manufacturing facilities within the state. In MS there are more than 30 wood

products facilities and more than 55 paper manufacturing facilities within the state. The Solvay pellet mill is the third active biomass manufacturing facility in MS.

As previously stated, pine forests dominate the majority of the forests within the supply area. Primary species for these pine forests include loblolly pine (*Pinus taeda*), Slash pine (*Pinus elliotii*), Shortleaf pine (*Pinus echinata*) and Longleaf pine (*Pinus palustris*). Primary species for the hardwood forests include Oak (*Quercus* spp), Sweetgum (*Liquidambar styraciflua*), Maple (*Acer* spp), Sycamore (*Platanus occidentalis*), Blackgum (*Nyssa sylvatica*), and Elm (*Ulmus* spp). No species purchased at the SBE facility is listed on the CITES list. Longleaf pine was recently added to the IUCN Red List.

Pine forests are typically managed on an even-aged basis with a rotation age of 25 to 30 years. During this rotation the pine stand may be thinned one or two times during the middle of the rotation with a final harvest completing the rotation. Most pine forests are artificially regenerated with pine seedlings planted by hand to defined stand densities. Chemical site preparation is typically used to manage the less desirable hardwood species and herbaceous species at stand establishment. Chemical treatments are minimal or below label rates; do not kill all competing species and last about two years so the pine seedlings can become established. Fertilizers are not normally applied to these forests due to costs. Some private investment groups (REITS, TIMOs) may apply fertilizers on forests which are more intensively managed. These intensively managed pine forests represent a very small percentage of the overall pine forests in the supply basin.

Hardwood forests can be managed either as even-aged or uneven-aged stands. Most hardwood stands are 40 to 50 years when harvested if managed as an even-aged stand. No site preparation or fertilizers are used on hardwood forests.

The vast majority of forests in the Solvay SBA are managed according to state forestry best management practices (BMPs). While these BMPs are normally voluntary, all Solvay suppliers are contractually required to abide by them. Supplier compliance with state BMPs is verified through Solvay's Supplier Verification Program (BMP compliance monitoring). Solvay's SFI Fiber Sourcing certification and procedures require all harvesting professionals to maintain continuing education training on BMPs and other sustainable forestry issues such as wildlife habitats and biodiversity and aesthetics.

Additional detail is provided in Solvay's Supply Base Report (SBR), which can be found on their website at the following address:

<http://solvaybiomassenergy.com/sbp-supply-base-report/>

5.3 Detailed description of Supply Base

Sustainable forestry certification is present in Solvay's SBA with about 3.4 MM hectares (27%) being certified to one or more certification schemes (SFI, FSC, ATF). SFI forest certification has the most acres certified within the supply area with almost 1.9 MM hectares (15%) certified. These forested hectares are primarily owned by private investment companies. The American Tree Farm System (ATF) certification accounts for another 1.4 MM acres (12%) within the supply area. The Forest Stewardship Council (FSC) accounts for about 224 M hectares or 2% of the supply area.

Solvay purchases softwood and hardwood chips and pine shavings for its feedstock. All feedstock is considered “SBP Compliant” because Solvay has implemented a Supply Base Evaluation. Solvay does not rely on purchasing fiber with FSC or PEFC forest management or CoC claims to satisfy SBP requirements. Primary feedstock comes from chips generated directly from the forest through in-woods chippers or from a third-party chipping/storage yard. The primary feedstock consists of pine species with various hardwood species mixed with the pine and comes from small forest landowners (85%) and large forest landowners (15%). Secondary feedstock comes from residual chips produced at sawmills and shavings from sawmills and planer mills. All residual chips and shavings will be pine.

5.4 Chain of Custody system

As discussed earlier in Section 5.1 of this public summary, Solvay is also certified to multiple voluntary standards including the SFI, PEFC and FSC Chain of Custody (CoC) Standards. Solvay purchases all feedstock through their CoC system and uses their CoC procedures to ensure the fiber meets the SBP Principles, Criteria and Indicators from SBP Framework Standard 1: Feedstock Compliance Standard. For example, a variety of the CoC procedures are used to ensure the fiber is coming from within their defined Supply Base Area (Principle 1, Criteria 1.1, Indicator 1.1.2). All primary and secondary feedstock is considered within the scope of Solvay’s Supply Base Evaluation, therefore no segregation of feedstock is required and all finished pellets are considered SBP Compliant.

Key chain of custody procedures/controls include:

- Solvay maintains an approved list of suppliers that can deliver primary and secondary feedstock.
- A Fiber Purchase Agreement is signed with all suppliers before fiber can be received at the Solvay weigh scale and suppliers are provided with a delivery form (cab card) that must be provided at the Solvay weigh scale with each delivery. The delivery information is entered into Solvay’s fiber tracking database (3LOG) and includes: Landowner / tract name, Supplier name, Product type / species, County of harvest location, Producer name, and Logger training number.
- The Solvay Representative will ensure all wood producers delivering primary feedstock directly from the forest will have completed and are in good standing with the continuing education requirements of the SFI Implementation Committee’s approved logger training. The Solvay Representative will validate the logger training records on an annual basis.
- Solvay has a BMP Compliance program for suppliers and the Solvay Representative completes a BMP Compliance Checklist on a sample of tracts to evaluate BMP implementation. Overall sample size is a minimum of five percent (5%) of the tracts from which fiber is purchased or a minimum of twelve (12) samples per year, whichever is greater. Completed BMP Compliance Checklists are maintained as certification records.

The BMP Compliance program serves, in combination with other tools such as state forestry agency inspection programs, SFI Inconsistent Practices reporting, and external communication received regarding harvest problems, to help Solvay monitor the BMP compliance of their suppliers as contractually required in the Fiber Supply Agreement.

6 Evaluation process

6.1 Timing of evaluation activities

The following table summarizes the evaluation activities:

Evaluation Activity	Date / Location	Persons Involved	Approx. Duration
Pre-Assessment / Document Review	April 27-28, 2015. Off-site from PwC's office.	Bruce Eaket, PwC.	6 hours
Initial Assessment	April 30-May 1, 2015. On-site in Quitman, MS and surrounding area.	Bruce Eaket, PwC. Simon Armstrong, SBP Witness Auditor. Solvay Biomass Energy, LLC representatives: • Jacob Rheuban, Board Member. • Mark McKelvaine, Procurement Manager. • Gary Boyd. Observer. Consultant. • Nicolas van der Heyden. Site Engineer • Claes Rossby, Plant Manager Supplier Assessments: • 3 primary feedstock suppliers - harvesting sites • 1 secondary feedstock supplier - sawmill	12 hours
PwC Stakeholder Consultation	April 29 – May 31, 2015. Off-site from PwC's office.	Bruce Eaket, PwC.	2 hours
Audit Closure and PwC Certification Decision	June 1 – July 3, 2015. Off-site from PwC's office.	Bruce Eaket, PwC. Cheryl Woode, PwC. Mike Harris, PwC. Jacob Rheuban, Solvay Biomass Energy, LLC Board Member. Mark McKelvaine, Solvay Biomass Energy, LLC Procurement Manager. Cheryl Wood, PwC. Mike Harris, PwC.	4 hours

6.2 Description of evaluation activities

As discussed in Section 6.1 of this public summary, PwC completed Solvay's initial SBP assessment in four phases, with the most significant being the on-site assessment.

- Pre-Assessment / Document Review:

PwC determined that conducting the pre-assessment / document review off-site from our office was acceptable because we are currently Solvay's SFI/PEFC CoC and SFI Fiber Sourcing Certifying Body and therefore already familiar with their CoC and fiber procurement systems. In addition, Solvay is certified to

the FSC Controlled Wood Standard with a different Certifying Body, but the SFI, PEFC and FSC assessments are conducted at the same time using an integrated audit approach so PwC is also familiar with Solvay's FSC Controlled Wood system. Solvay completed their SBE Risk Assessment with significant reliance on their existing management systems and procedures designed to meet the voluntary standards discussed above and the applicable laws and regulations. Time during this phase of the assessment was focused on reviewing the SBP requirements that are unique from the other standards, such as Greenhouse Gas (GHG) reporting, the SBR and SBE/Risk Assessment.

- Initial Assessment:

PwC conducted the Initial Assessment on-site at the Solvay plant by conducting interviews with management and the authors of the SBR/SBE/Risk Assessment, reviewing management system records, GHG calculations, inspecting the plant and interviewing staff at critical control points such as the weigh station, which is the fiber entry point to the plant. PwC also observed Solvay's BMP monitoring system being implemented at a sample of their suppliers, which included three primary feedstock suppliers and one secondary feedstock supplier.

- PwC Stakeholder Consultation: Discussed below in Section 6.3 of this public summary.
- Audit Closure and PwC Certification Decision:

PwC provided the draft non-conformities and opportunities for improvement to Solvay at the closing meeting of the Initial Assessment. Solvay responded with their root cause/action plans and if appropriate, provided PwC with revised management system procedures and templates of forms, etc. Once the lead auditor accepted Solvay's changes and closed the audit findings, the PwC lead auditor's working papers including protocols/checklists and evidence of conformance was reviewed by a peer lead auditor. The complete Solvay file was then reviewed by the PwC Practice Leader who made the final PwC certification decision.

6.3 Process for consultation with stakeholders

Solvay's stakeholder consultation had been initiated at the time of the Pre-Assessment / Document Review phase, but they gave their stakeholders until May 25, 2015 to respond. Therefore during the Initial Assessment PwC reviewed the names and organizations that were included in Solvay's stakeholder consultation and followed-up with Solvay after May 25, 2015 to obtain a summary of any feedback received and the resulting changes to the SBE/Risk Assessment, if applicable. Solvay reported that they had received no feedback during their stakeholder consultation period.

Solvay included suppliers, Forestry Commissions, Forestry Associations, Nature Conservancies, National Forests, Wildlife Refuges and Federations in their stakeholder consultation process. At this stage of Solvay's SBP implementation, key stakeholders interested in and affected by Solvay's operations are primarily their suppliers, therefore PwC interviewed a sample of supplier stakeholders during the Initial Assessment. Additionally, PwC sent letters on April 29, 2015 to a sample of Solvay's other stakeholders in the Supply Base Area inviting them to provide feedback directly to the PwC lead auditor by May 31, 2015 and asking them to summarize the feedback, if any, that they provided to Solvay. PwC did not receive any

information during our stakeholder consultation process that changed our assessment of risk as discussed in Section 8 of this public summary.

7 Results

7.1 Main strengths and weaknesses

This summary of strengths and weaknesses should be read in conjunction with the summary of the SBE Risk Assessment in Section 8 and the summary of the Initial Assessment findings in Section 10 of this public summary. The strength of Solvay's SBP program is their integration of the SBP requirements with their existing fiber procurement management systems and procedures designed to meet the requirements of applicable laws and regulations in the Supply Base Area (SBA) and the requirements of voluntary standards including SFI/PEFC/FSC CoC, FSC Controlled Wood and SFI Fiber Sourcing. As a result of operating in a region that has a long term forest products industry and existing laws and regulations that align with the majority of the SBP requirements and the commitment to other voluntary standards, Solvay and their staff have developed a strong knowledge of the forestry industry practices conducted through the SBA, have a good awareness of the suppliers operating in the region and have limited the number of suppliers from which they purchase fiber.

Solvay's strength is also a weakness. As a result of limiting their number of suppliers and fostering long term relationships, the Solvay procurement program has an inherent familiarity risk that may reduce the effectiveness of their monitoring programs. Solvay had documented procedures to address some of the familiarity risks and PwC has pointed out further issues in our non-conformities and opportunities for improvement, which have been addressed by Solvay during the completion of the Initial Assessment.

7.2 Rigour of Supply Base Evaluation

Solvay has developed a detailed SBE including a good description of their Supply Base Area. When completing the SBE Risk Assessment, Solvay primarily relied on their existing management and monitoring systems implemented to meet other voluntary standards and designed to ensure compliance with applicable laws and regulations. PwC agrees with this risk assessment approach and the scope definition.

7.3 Compilation of data on Greenhouse Gas emissions

Solvay has the required expertise in-house and through the use of consultant engineers to calculate and report accurate GHG data. PwC found that the scope of the calculations included all Solvay operations and the calculations used the industry knowledge and tools that are currently available. PwC did suggest an opportunity for improvement regarding the presentation of the data and Solvay responded by improving the presentation of the data.

7.4 Competency of involved personnel

Solvay determined that their in-house fiber procurement group could complete the SBE and the related Risk Assessment with assistance from Gary Boyd of Greener Options, Inc. Between Gary Boyd and the Solvay Fiber Procurement Manager, Mark McKelvaine, the team had significant experience and knowledge of the Supply Base Area and the local application of the SBP requirements. Mark McKelvaine is also responsible

for the implementation of Solvay's fiber procurement management system and procedures on a daily basis. A summary of Mark and Gary's experience and backgrounds is provided below:

- Mark McKevlaine, Solvay Fiber Procurement Manager:

Mark is a SFI Trained Logger with an Associate's Degree in Forestry and has owned and operated a timber harvesting company for 18 years. During Mark's career he has worked with numerous private landowners and has harvested thousands of acres located in more than 30 counties in Mississippi, Alabama and Louisiana. As a Managing Forester, Mark supervised operations of up to 12 logging crews and in the late 1980's started some of the first mechanized operator select plantation thinning operations in the Region.

- Gary Boyd Greener Options, Inc.:

Gary is a Certified Forester with over 25 years of forest management experience in the Southern US with both Union Camp and International Paper. Gary's roles included managing fiber procurement and forest management activities in four counties of Georgia, implementing the SFI requirements on almost two million acres, managing wildlife and biodiversity programs, working with conservation partners, conducting various public outreach programs and presentations. Since becoming a consultant he has been assisting companies with strategic sustainability planning, policy development, and the implementation of fiber and chain of custody standards.

7.5 Stakeholder feedback

Not applicable. As discussed in Section 6.3 of this public summary, neither Solvay nor PwC received feedback during our stakeholder consultation processes that changed our assessment of risk as discussed in Section 8 of this public summary.

7.6 Preconditions

PwC has not issued any preconditions to Solvay. As discussed in Section 10 of this public summary, there were two non-conformities that were closed before a certificate could be issued.

8 Review of Biomass Producer's Risk Assessments

As discussed earlier in Section 5.1 of this public summary, Solvay is also certified to multiple voluntary standards including SFI Fiber Sourcing, SFI/PEFC/FSC Chain of Custody and FSC Controlled Wood. Solvay purchases all feedstock within the scope of their FSC controlled wood system, and since the FSC Controlled Wood Standard is SBP-approved, Solvay could potentially sell their pellets with an "SBP Controlled" claim. However, Solvay intends on using the "SBP Compliant" claim, therefore a Supply Base Evaluation (SBE) and the associated Risk Assessment are required. Solvay's SBE Risk Assessment is attached as Annex 1 to their Supply Base Report (SBR).

PwC completed Solvay's initial certification to the SFI Fiber Sourcing and the SFI/PEFC Chain of Custody Standards in 2014 and therefore is familiar with Solvay's management systems, monitoring systems, suppliers and the applicable laws and regulations in their supply base area.

PwC assessed risk for the indicators using the guidance in Section 11 of SBP Framework Standard 2: Verification of SBP-compliant Feedstock and evaluated risk at both regional and the individual forest level. When completing their Risk Assessment, Solvay primarily relied on their existing management and monitoring systems implemented to meet other voluntary standards and designed to ensure compliance with applicable laws and regulations. As a result of Solvay's Risk Assessment approach, PwC was able to assess risk for the indicators using a desk review of the documents referenced in the Risk Assessment as well as interviewing staff and suppliers and observing the Solvay BMP compliance monitoring system being applied at supplier harvesting locations during the on-site portion of the SBP assessment. The third-party consultant used to assist with the SBE attended PwC's assessment and was interviewed.

Solvay determined that all indicators have low risk therefore a Supplier Verification Programme (SVP) and mitigation measures were not completed and PwC agrees with Solvay's assessment of risk as shown in the table on the following page:

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

Indicator	Risk rating (Low or Specified)	
	Producer	CB
1.1.1	Low	Low
1.1.2	Low	Low
1.1.3	Low	Low
1.2.1	Low	Low
1.3.1	Low	Low
1.4.1	Low	Low
1.5.1	Low	Low
1.6.1	Low	Low
2.1.1	Low	Low
2.1.2	Low	Low
2.1.3	Low	Low
2.2.1	Low	Low
2.2.2	Low	Low
2.2.3	Low	Low
2.2.4	Low	Low
2.2.5	Low	Low
2.2.6	Low	Low
2.2.7	Low	Low
2.2.8	Low	Low
2.2.9	Low	Low
2.3.1	Low	Low
2.3.2	Low	Low

Indicator	Risk rating (Low or Specified)	
	Producer	CB
2.3.3	Low	Low
2.4.1	Low	Low
2.4.2	Low	Low
2.4.3	Low	Low
2.5.1	Low	Low
2.5.2	Low	Low
2.6.1	Low	Low
2.7.1	Low	Low
2.7.2	Low	Low
2.7.3	Low	Low
2.7.4	Low	Low
2.7.5	Low	Low
2.8.1	Low	Low
2.9.1	Low	Low
2.9.2	Low	Low
2.10.1	Low	Low

9 Review of Biomass Producer's mitigation measures

Not currently applicable to Solvay because as discussed previously in Section 8 of this public summary, all indicators were assessed to be low risk at the time of the Risk Assessment.

10 Non-conformities and observations

The details of the Non-conformities and Opportunities for Improvement raised during the evaluation are provided in the tables below:

- Nonconformities**

PwC Reference Number	SBP Requirement	Finding Details	Status
450-IA-NC-01 (Minor)	SBP Framework Standard 4 @ 6.1.1 requires that all downstream inputs of non-SBP compliant biomass, shall have been determined to be EUTR compliant and shall have been subjected to 'due diligence'.	During the assessment, Solvay described future sales scenarios where they may purchase pellets from a third-party supplier and mix them with their own pellets. However, Solvay's procurement procedures do not currently require the purchased third-party pellets to be SBP Compliant, SBP Controlled or EUTR Compliant. This finding was given a minor nonconformity classification and the issue did not impact the integrity of the affected SBP-certified products and the credibility of the SBP trademarks, because to date, Solvay has not purchased third-party pellets, nor were any purchases pending. Solvay was given 60 days to resolve the issue and has subsequently provided PwC with an acceptable action plan and evidence of implementation.	CLOSED
450-IA-NC-02 (Minor)	SBP Framework Standard 2 @ Clause 15.3 requires all necessary monitoring system procedures to be documented.	Solvay has documented procedures for their Monitoring System, but there are a few operational exceptions that are not accurately described. Although the documentation was not complete, the Monitoring System was functioning therefore the issue did not impact the integrity of the affected SBP-certified products and the credibility of the SBP trademarks. Solvay was given 60 days to resolve the issue and has subsequently provided PwC with an acceptable action plan and evidence of implementation.	CLOSED

- Opportunities for Improvement**

PwC Reference Number	SBP Requirement	Finding Details	Status
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PwC Reference Number	SBP Requirement	Finding Details	Status
450-IA-OFI-01	SBP Standard 2 @ 13.3 suggests that the principles of stakeholder consultation in Forest Stewardship Council's standard for Stakeholder Consultation are recommended as a good practice.	Solvay has completed stakeholder consultation, but the Supply Base Evaluation (SBE) was not provided directly to the stakeholders, so Solvay may wish to consider initiating a peer review of the SBE. Solvay responded that their use of a third-party consultant to assist in completing the SBE meets the spirit of the Standard to consider the views of peers.	CLOSED
450-IA-OFI-02	SBP Standard 1 @ 2.7 requires that the evidence in the SBE must demonstrate compliance with the requirements of the Standard and the means of verification must be appropriate to the scale, intensity and level of risk associated with the Supply Base.	Solvay has documented their SBE evidence and in some cases has relied on existing laws and the systems they have developed to comply with the laws. Most of the evidence relating to existing laws is well documented and complete, but several SBE sections are written at a high level and could be more detailed. Solvay has added more detail regarding existing laws to the SBE.	CLOSED
450-IA-OFI-03	SBP Standard 5 @ 5.1 requires that all GHG related data submissions must be supported by appropriate evidence.	Solvay has developed a spreadsheet for collecting and communicating their GHG related data and has the appropriate evidence for the data that has been reported. However, there are several data points that are not applicable to Solvay or the answer is 0.0 and Solvay may wish to include notes and/or footnotes in these cases so it is clear to the downstream users of the data that the question was understood and considered by Solvay. Solvay has re-organized the structure of their GHG spreadsheet.	CLOSED
450-IA-OFI-04	SBP Standard 2 @ Clause 15.1 requires that the Biomass implement a management and monitoring system to maintain compliance with the requirements of this and all other relevant SBP Standards.....	Solvay has developed a comprehensive form for monitoring suppliers' performance, including their compliance with Best Management Practices. Solvay may wish to improve the transparency of the form by adding a "checked/not checked" column beside each question. In addition, Solvay may wish to improve the amount of detail recorded on the form, by adding a "comments/evidence" column beside each question. Solvay has re-structured the format of the BMP compliance monitoring form.	CLOSED

11 Certification decision

PwC has concluded that the Client has the organizational capability to systematically meet the performance objectives and the requirements of the Standards based on the elements of the Standards that were tested as discussed earlier in Section 6 of this public summary. PwC's Lead Assessor recommends certification of Solvay as of July 3, 2015. The next assessment should be completed prior to June 1, 2016 but may be completed earlier to bring future SBP assessments in alignment with Solvay's other certification assessments. The SBP certification expires July 2, 2020.