Supply Base Report:

Enviva, LLC - Sampson Re-assessment

Sustainable Biomass Program
sbp-cert.org

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

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

Document history

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1 Overview

Producer name:	Enviva, LLC - Sampson
Producer address:	5 Connector Road, US 117, 28341 Faison, NC, United States
SBP Certificate Code:	SBP-04-06
Geographic position:	35.116700, -78.180500
Primary contact:	Shawn Cook, +1 850 227 4345, shawn.cook@envivabiomass.com
Company website:	www.envivabiomass.com
Date report finalised:	23 Apr 2026
SBR reporting period from:	01 Apr 2025
SBR reporting period to:	31 Mar 2026
Name of the Certification Body:	SCS Global Services
Certification Body Approval date:	29 Jun 2026
SBP Standard(s) used:	SBP Standard 1: Feedstock Compliance v2.0, SBP Standard 2: Feedstock Verification v2.0, SBP Standard 4: Chain of Custody v2.0, SBP Standard 5: Collection and Communication of Data v2.0, Instruction Document 1A: SBP Requirements for Primary Feedstock from Trees Outside Forests (TOF) v1.0, Instruction Document 5E: Collection and Communication of Energy and Carbon Data v2.0, Instruction Document EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413 v2.0
Feedstock origin (countries)	United States (-)
Weblink to Standard(s) used:	https://sbp-cert.org/documents/standards-documents/standards

2 Description of the Biomass Producer and the Supply Base

2.1 Description of the company

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

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

Number of employees: *1250*

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

Number of direct feedstock suppliers: *472*

Approximate number of feedstock sub-suppliers: *450*

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

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

2.2 Detailed description of the Supply Base

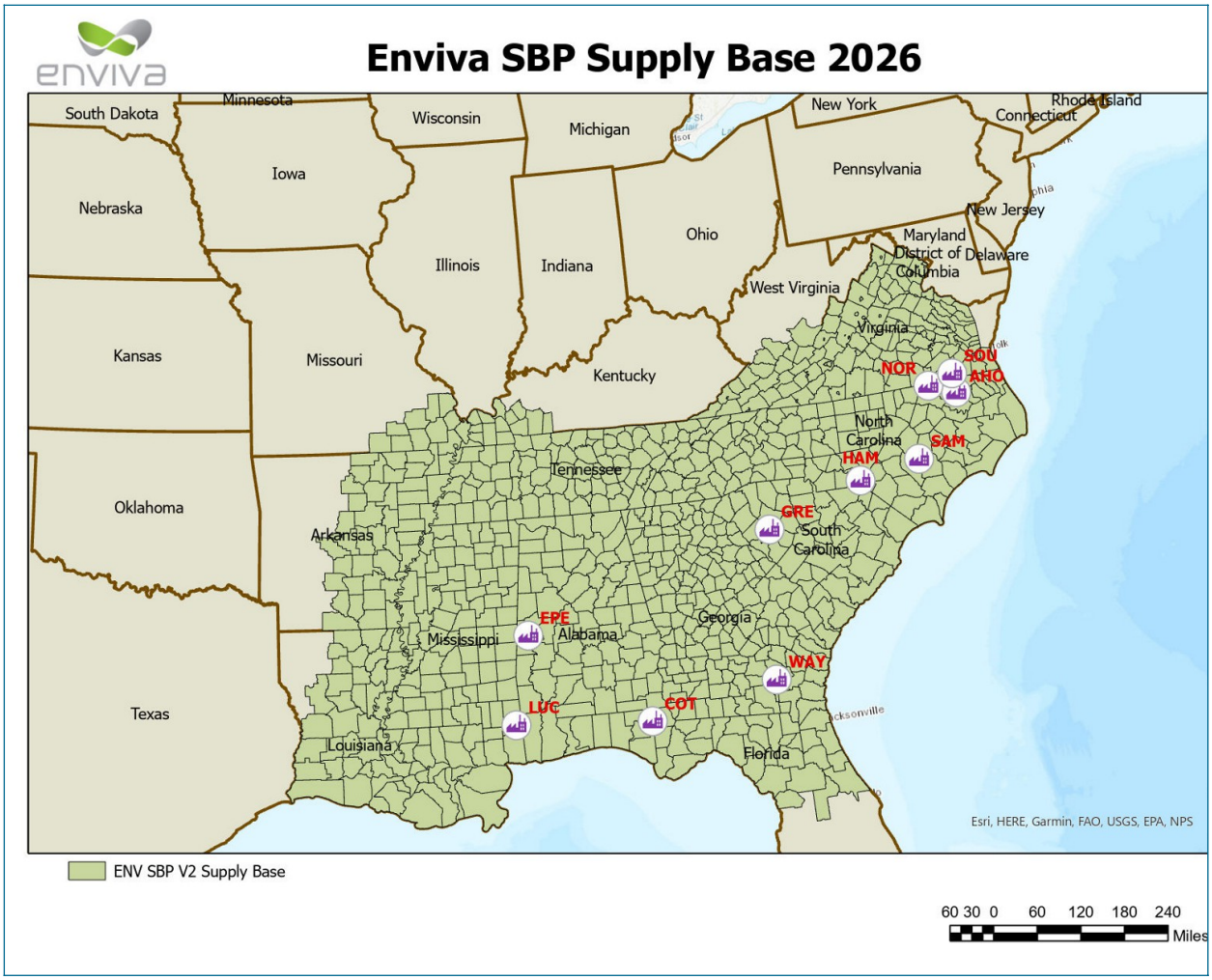
Guidance: Tables below have been generated automatically for each sourcing country based on the selection of 'Feedstock origin (countries)' in section 1 above.

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

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

Country	United States
Area/Region	-
Exclusions	

Feedstock types	Primary, Processing residues1
Feedstock Product Groups	Forest feedstock (1A), Trees outside forest (TOF) - Agricultural land feedstock (3A), Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock , SBP Controlled feedstock
Is the forest managed to supply energy and non-energy markets?	Yes - Majority
For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?	Yes - Majority
Risk assessment(s)	Yes – Regional Risk Assessment (RRA) used
Provide a concise summary of why a SBE was determined to be required or not required here:	
U.S. RRA approved for National and private forests, no SBE required.	
Feedstock types included in SBE:	Primary, Processing residues1
Includes EU RED SBE:	Yes
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	Yes
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	117.2226
Map(s) of the Supply Base area:	


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

2.3 Feedstock information

a. Total volume of Feedstock: 800,000-1,000,000 tonnes

b. Volume of primary feedstock: 800,000-1,000,000 tonnes

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

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

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

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

e. **Hardwood (i.e. broadleaf trees): specify proportion of feedstock from (%)**: 36.00

f. **Softwood (i.e. coniferous trees): specify proportion of feedstock from (%):** 64.00

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 (%):** 20.00

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

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

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

m. **Volume of processing residues feedstock:** 1-200,000 tonnes
Physical form of the feedstock: Chips, Sawdust, Other (specify)

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

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

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

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

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

3 Supply Base Risk Assessments and Risk Management Measures

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

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

3.1 Summary of the Supply Base Evaluation

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

- Federal and/or state laws and regulations proved sufficient to determine low risk. (REF1)
- If existing laws and/or regulations were not determined to be strong enough or did not exist then the indicator was supplemented/evaluated using credible third-party Information from organizations like the National Council for Air and Stream Improvement, United States Forest Service Forest Inventory Analysis, Southern Group of State Foresters, National Association of State Foresters, etc. (REF2)
- Documentation of regulatory agencies and enforcement agencies, implementation of forestry best management practices, etc. (REF3)
- Results from data monitoring, enforcement and other publicly available data. (REF4)

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

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

3.2 Conflicts with applicable national and sub-national legislation

No conflicts with federal or state laws and regulations.

3.3 Risk Management Measures

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

Country: United States

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

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

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

HCV 1 Species Diversity
Critical Biodiversity Areas (CBA)

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

- Cape Fear Critical Biodiversity Area

Species

- Cheoah Bald Salamander

- Dusky Gopher Frog

- Patch-nosed Salamander

HCV 3 High Conservation Values

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

HCV 3 High Conservation Values

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

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

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

Aquatic Habitats - In addition to threats associated with agriculture, development, and mining, the following threats were associated with forest management: Hydrologic alteration partially due to forestry practices and conversion from hardwood forests to non-native planted pine (which may include ditching as a practice in

wetter areas), reduced water quality partially due to loss of near-stream forested habitat and sedimentation associated with forestry.

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

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

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

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

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

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

Montane Longleaf Pine – Biodiversity values can be adversely affected by forest management activities via conversion of longleaf to other pine types, and the use management techniques, including herbicide

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

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

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

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

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

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

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

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

Mitigation measure:

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

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

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

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

Mitigation measures for Category 3 High Conservation Values

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

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

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

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

- Imperiled Species,

- Cultural HCVs.

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

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

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

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

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

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

- Illegally harvested wood

- Wood harvested in violation of traditional and civil rights.

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

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

- Wood from forests where genetically modified trees are planted.

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

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

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

- Landowner outreach through workshops

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

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

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

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

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

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

Monitoring and outcomes:

Outreach and Education

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

Procurement Policy

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

Implement Management Activities & Landowner Incentives

- Continue working with TLA to
- Hold landowner workshops
- Track the number of landowners receiving LLP restoration plans through the SPBA
- Track the conversion of other pine forest types to LLP
- Provide LLP seedlings to landowners assisting them in meeting their LLP restoration objectives

BMP Monitoring

- Ensure Commodity Managers and stumpage staff complete the necessary field inspections

Where necessary work with suppliers to improve their BMP score

Country: United States	
Area/sub-scope: Southeast and eastern southcentral	
Risk Assessment used:	
	☐SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☒SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.1 Feedstock shall not be sourced from land that had one of the following statuses in January 2008 and no longer has that status due to land conversion: a. Forests b. Wetlands c. Peatlands d. Highly biodiverse grasslands.	
Description of the specific risk:	
As described in Annex 1 Enviva focused on forest conversion since there is adequate protection for wetlands and peatlands vis the Clean Water Act. Enviva does not source from highly biodiverse grasslands so it is excluded in the RMP. Conversion: The FSC US CWNRA definition of conversion does not align with the SBP focusing on population growth and the issuance of building permits; focusing on urban development. In summary the authors found, "Rates of urban development vary throughout the United States with higher rates in the Pacific Coast Region and portions of the Southeast Region. These two regions are also the regions identified as experiencing more recent forestland loss. Therefore, the greatest risk of materials entering the supply chain from conversions will most likely be in these two regions; however, the risk is not consistent across the regions. FSC identified 46 counties within the Enviva supply base are at risk of conversion due to urban development. The SBP definition for conversion is much broader, "The process of changing or causing to change from one form to another". Though we recognize the identification of counties conducted under the FSC process, Enviva's approach is more stringent, we avoid harvests where the forest will not be regenerated into a new forest. There are not laws in states included in the supply base assessment prohibiting a landowner from converting a forest to another land use. Some local zoning laws and regulations may have a small local impact. Enviva requested the National Council for Air and Stream Improvement to conduct a resource analysis of the supply base area. From 2010 to 2020 the report indicates a -1% reduction in forestland area. Similar	

results are included the SBP RRA US draft citing a -1% reduction in timberland. Though the potential for conversion of forest is low Enviva is aware of conversion in its supply base area.

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

Mitigation measure:

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

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

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

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

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

- Wood from forests where genetically modified trees are planted.

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

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

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

Monitoring and outcomes:

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

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

	☐SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment

Indicator with specified risk:

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

Description of the specific risk:

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

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

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

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

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

Species

- Cheoah Bald Salamander
- Dusky Gopher Frog
- Patch-nosed Salamander

HCV 3 High Conservation Values

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

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

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

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

Florida Panhandle Critical Biodiversity Area

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

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

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

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

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

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

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

threat. Other threats include fire-suppression, urban development, forest conversion, non-native species, climate change.

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

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

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

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

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

- Critically Imperilled – At very high risk of extinction or elimination due to very restricted range, very

few populations or occurrences, very steep declines, very severe threats, or other factors.

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

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

Mitigation measure:

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

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

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

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

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

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

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

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

- Imperiled Species ,

- Cultural HCVs.

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

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

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

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

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

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

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

- Illegally harvested wood

- Wood harvested in violation of traditional and civil rights.

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

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

- Wood from forests where genetically modified trees are planted.

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

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

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

- Landowner outreach through workshops

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

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

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

BMP Monitoring
Enviva conducts field inspections including forestry BMPs at two stages. All inspections are scored and the

score used to identify poor performers or areas where a supplier could improve

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

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

Monitoring and outcomes:

Outreach and Education

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

Procurement Policy

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

Implement Management Activities & Landowner Incentives

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

BMP Monitoring

1. Ensure Commodity Managers and stumpage staff complete the necessary field inspections

Where necessary work with suppliers to improve their BMP score

Country: United States

Area/sub-scope: Southeast and eastern southcentral	
Risk Assessment used:	
	☐SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☒SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
3.1.1 LULUCF emissions shall be accounted for through one of the following routes: Route A Feedstock may be sourced from a country of origin which is party to the Paris Agreement, and which has submitted a Nationally Determined Contribution to the United Nations Framework Convention on Climate Change (UNFCCC) covering carbon emissions and removals from agriculture, forestry and land use which ensure the changes in carbon stock associated with biomass harvest are counted towards the country's commitment to reduce or limit greenhouse gas emissions, or Route B Feedstock may be sourced from a country of origin which is party to the Paris Agreement and has national or sub-national laws in place (developed in accordance with Article 5 of the Paris Agreement and applicable in the area of harvest), to conserve and enhance carbon stocks and sinks, and provided there is evidence that reported LULUCF-sector emissions do not exceed removals, or Route C Feedstock may be sourced from a Supply Base where an assessment demonstrates that both the carbon stock is stable, and the forests' capacity to act as a carbon sink is stable or increasing over the long term.	
Description of the specific risk:	
See ENV-SBP-15 Enviva RED III Level B Assessment	
Mitigation measure:	
As indicated in Indicator 3.2.1., analysis of carbon stocks for the RRA geography are consistently stable or increasing, for decades, supporting the stable or increasing capacity of the forests to act as a sink. This analysis finds that, across the region, an increase of aboveground live carbon stocks of 22.37% since 2008 was observed, from approximately 4.7 to 5.7 billion tonne (Table 3.2.1.-1). Carbon stocks increased as little as 5.81% in Texas to as high as 66.10% in Oklahoma. Carbon stocks increased at a greater rate on public lands compared to private lands, with an increase of 38.95% and 21.09%, respectively (Table 3.2.1.-2).	
Monitoring and outcomes:	
Enviva will continue to monitor our supply base area to ensure our sourcing practices do not have a negative impact on LULUCF emission.	

Country: United States	
Area/sub-scope: Southeast and eastern southcentra	
Risk Assessment used:	
	☐SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☒SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
3.1.1 LULUCF emissions shall be accounted for through one of the following routes: Route A Feedstock may be sourced from a country of origin which is party to the Paris Agreement, and which has submitted a Nationally Determined Contribution to the United Nations Framework Convention on Climate Change (UNFCCC) covering carbon emissions and removals from agriculture, forestry and land use which ensure the changes in carbon stock associated with biomass harvest are counted towards the country's commitment to reduce or limit greenhouse gas emissions, or Route B Feedstock may be sourced from a country of origin which is party to the Paris Agreement and has national or sub-national laws in place (developed in accordance with Article 5 of the Paris Agreement and applicable in the area of harvest), to conserve and enhance carbon stocks and sinks, and provided there is evidence that reported LULUCF-sector emissions do not exceed removals, or Route C Feedstock may be sourced from a Supply Base where an assessment demonstrates that both the carbon stock is stable, and the forests' capacity to act as a carbon sink is stable or increasing over the long term.	
Description of the specific risk:	
See ENV-SBP-15 Enviva RED III Level B Assessment	
Mitigation measure:	
As indicated in Indicator 3.2.1., analysis of carbon stocks for the RRA geography are consistently stable or increasing, for decades, supporting the stable or increasing capacity of the forests to act as a sink. This analysis finds that, across the region, an increase of aboveground live carbon stocks of 22.37% since 2008 was observed, from approximately 4.7 to 5.7 billion tonne (Table 3.2.1.-1). Carbon stocks increased as little as 5.81% in Texas to as high as 66.10% in Oklahoma. Carbon stocks increased at a greater rate on public lands compared to private lands, with an increase of 38.95% and 21.09%, respectively (Table 3.2.1.-2).	
Monitoring and outcomes:	
Enviva will continue to monitor our supply base area to ensure our sourcing practices do not have a negative impact on LULUCF emission.	

4 Stakeholder engagement

4.1 General description

Biomass Producer's stakeholder engagement start date: 31 Jan 2025

Biomass Producer's stakeholder engagement end date: 04 Mar 2025

Total number of stakeholders contacted: 69

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

Enviva conducted a stakeholder consultation to the new SBP Version 2 Standards. Participants were invited via email to review and comment on the results of the evaluation using a SurveyMonkey link. Stakeholders are listed below.

AL Forestry Assoc	GA TNC	Rex Lumber
AL Forestry Commission	Homan Industries	Sandhill Prescribed Burn Association
AL SAF	Inter-Tribal Timber Council	Sapp's Land Clearing & Excavation
AL TNC	Interfor	SC Forestry Association
AL Wildlife Fed	James R. Fincher Timber Co.	SC Forestry Commission
Audubon Florida	LA Forestry Commission	SELC
Calhoun Timber Co	LA TNC	St. Johns River WMD
Desoto Pole & Piling	LA Wildlife Fed	Swain & Temple, Inc.
Dogwood	Longleaf Alliance	TN DOF
DU	MS Band of Choctaw Indians	TN Forestry Assoc
Earthworm	MS Forestry Assoc	TN TNC
Federation of Southern Cooperatives	MS Forestry Assoc	United South and Eastern Tribes Inc.
FL Forest Service	MS Forestry Commission	University of Florida
FL Forestry Association	MS Forestry Commission	University of Georgia
FL TNC	MS TNC	VA Dept of Forestry
Forest Investment Associates	MSU Extension Service	VA SAF
Forest Landowners Assoc	NASF	Whitfield Timber Company
Forest Stewards Guild	NC Forestry Association	Wildlife Mississippi
Franklin Lumber	NC SAF	WWF
GA Forestry Association	NC TNC	Dovetail
GA Forestry Commission	NCASI	New March
GA Forestry Commission	NRDC	SCS Global
GA SAF	Pinchot	American Industrial Partners

4.2 Response to stakeholder comments

Stakeholder description: Residual Supplier

Stakeholder comment: Agreed or strongly agreed with all results of the Supply Base Evaluation

Response to the stakeholder: None required

5 Report updates and approval

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

Summary of changes: N/A

Name	Shivani Patel
Title	Report author
Date of report approval	23 Apr 2026

Name	Don Grant
Title	Management representative
Date of report approval	23 Apr 2026

Annex 1: Detailed findings for Supply Base Evaluation indicators

Annex 2: EU RED Supply Base Evaluation

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

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

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

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

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

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

Annex 2a: EU RED II Supply Base Evaluation

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

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

Verification and monitoring of suppliers

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

Feedstock inspection and classification upon receipt

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

Supplier audit for processing residues and post-consumer feedstock

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

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

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

Country: United States - -

Not Applicable - only urban and landscape feedstock is used

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

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