Supply Base Report:

LJR Forest Products 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

Version 1.0	**Published 26 March 2015**
Version 2.0	Published 10 August 2023
Version 2.1	Published 15 April 2024
Version 2.2	Published 21 May 2025
Version 2.3	Published 14 August 2025

© Copyright Sustainable Biomass Program Limited 2025

Table of contents

1 Overview

2 Description of the Biomass Producer and the Supply Base

2.1 Description of the company
2.2 Detailed description of the Supply Base
2.3 Feedstock information

3 Supply Base Risk Assessments and Risk Management Measures

3.1 Summary of the Supply Base Evaluation
3.2 Conflicts with applicable national and sub-national legislation
3.3 Risk Management Measures

4 Stakeholder engagement

4.1 General description
4.2 Response to stakeholder comments

5 Report updates and approval

Annex 1: Detailed findings for Supply Base Evaluation indicators

Annex 2: EU RED Supply Base Evaluation

Annex 2a: EU RED II Supply Base Evaluation

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

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

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

1 Overview

Producer name:	LJR Forest Products
Producer address:	1377 Old Nunez Rd, 30401 Swainsboo, United States
SBP Certificate Code:	SBP-04-22
Geographic position:	32.529800, -82.342300
Primary contact:	Lige Moore, +1 912 562 3446, ljr04@yahoo.com
Company website:	-
Date report finalised:	26 Sep 2025
SBR reporting period from:	01 Aug 2025
SBR reporting period to:	31 Jul 2026
Name of the Certification Body:	SCS Global Services
Certification Body Approval date:	07 Oct 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 5E: Collection and Communication of Energy and Carbon data. v2.1, Instruction Document EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413
Feedstock origin (countries)	United States (SouthEast)
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

LJR Forest Products is a single-site wood pellet facility located in Swainsboro, Georgia, United States. LJR Forest Products sources softwood mill residual chips, shaving and sawdust that originate from primary solid wood manufacturing facilities. The wood fiber inputs originate in southern Georgia and western South Carolina. This is a largely rural region where dominant land uses are forests and agriculture (forestry, row crops, cattle). These uses serve as primary economic livelihoods for local communities and populations. LJR Forest Products pellet mill is an important market for low grade and low valued fiber products. Utilized as wood pellets, this otherwise low value and marginal material contributes to the increased use of renewable energy and serves to mitigate greenhouse gas emissions.

This operation is situated in the regulatory and social context of the US, which maintains a strong system of governance, control of corruption and solid baseline “rule of law” social system. Similarly, the US also maintains a wide suite of regulations and voluntary programs, including best management practices (BMPs), environmental protections, human and traditional rights, worker health and safety, along with others. As such, these frameworks, working together, provide a complementary and supportive environment for demonstration of SBP-compliant feedstock.
The landscape is dominated by forests, with 86% in private ownership and the majority of that is owned by families and individuals in small parcels. The average FMU size is 29 acres in the southern region. Pine species are the dominant forest type in the supply area. Hardwood species stands are represented in pockets and tend to be managed for longer rotations and unintensively managed. Because the majority of this landscape is owned by families and the scale of their operations is small and timing infrequent, these forests are generally not intensively managed. Most landowners will harvest once or twice in the lifetimes.

LJR Forest Products does not own forest land and is not directly engaged in the harvesting or forest management activities. Similarly, LJR does not have responsibility for direct wood procurement. LJR Forest Products exerts influence through policies, supply contracts and periodic monitoring of suppliers. All softwood fiber is supplied to the pellet mill by primary sawmills. Thus, LJR Forest Products is considered an indirect and secondary producer that can indirectly influence forest management but cannot control how the forests are managed and how they are harvested. Land management and harvesting decisions are made by private family forest owners (who collectively own the majority of the land base in the supply area), in the context of U.S. Federal and State laws, regulations and State administered BMPs. Together, these measures provide for a very high level of management and overall strong performance in the sourcing region and wider US South.

The use of sawmill residuals provides an important market for low valued wood products that improves forest health conditions, minimizes fuels that contribute to wildfire, reduces site preparation costs, facilitates prompt reforestation and establishment of forest cover and provides the landowner with an economic incentive to keep their land in forest land us and well managed.

LJR purchases solely softwood pine species (Pinus). As noted above, LJR does not source any feedstock directly as stumpage or roundwood via suppliers. All LJR Forest Products' softwood fiber inputs are sourced indirectly from primary solid wood manufacturing facilities as residual chips, shaving and sawdust. No hardwood residuals are used and no hardwood harvesting contributes to LJR's fiber supply. LJR Forest Products’ facility does not utilize any construction, demolition or post-consumer derived feedstocks.

All fiber material sourced is sourced via FSC Chain of Custody and Controlled Wood Standards and are, thus, considered “controlled materials.” The company has notified all its suppliers that it will not accept “uncontrolled” sources of wood. It has incorporated the controlled wood restrictions in its Contracts/Supply Agreements/Self-declarations as formal agreements with suppliers. The company also conducts periodic internal audits of the suppliers’ documentation to verify the source area of the wood and fiber. These measures will ensure that uncontrolled wood sources are not allowed entry into the manufacturing facilities and would not be mixed with other certified and controlled material.

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

Number of employees: *24*

Annual maximum production capacity (metric tonnes): *250000*

Number of direct feedstock suppliers: *12*

Approximate number of feedstock sub-suppliers: *0*

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

LJR purchases solely softwood pine species (Pinus). As noted above, LJR does not source any feedstock directly as stumpage or roundwood via suppliers. All LJR Forest Products' softwood fiber inputs are sourced indirectly from primary solid wood manufacturing facilities as residual chips, shaving and sawdust. No hardwood residuals are used and no hardwood harvesting contributes to LJR's fiber supply. LJR Forest Products’ facility does not utilize any construction, demolition or post-consumer derived feedstocks.

All fiber material sourced is sourced via FSC Controlled Wood Standards and are, thus, considered “controlled materials.” The company has notified all its suppliers that it will not accept “uncontrolled” sources of wood. It has incorporated the controlled wood restrictions in its Contracts/Supply Agreements/Self-declarations as formal agreements with suppliers. The company also conducts periodic internal audits of the suppliers’ documentation to verify the source area of the wood and fiber. These measures will ensure that uncontrolled wood sources are not allowed entry into the manufacturing facilities and would not be mixed with other certified and controlled material.

2.2 Detailed description of the Supply Base

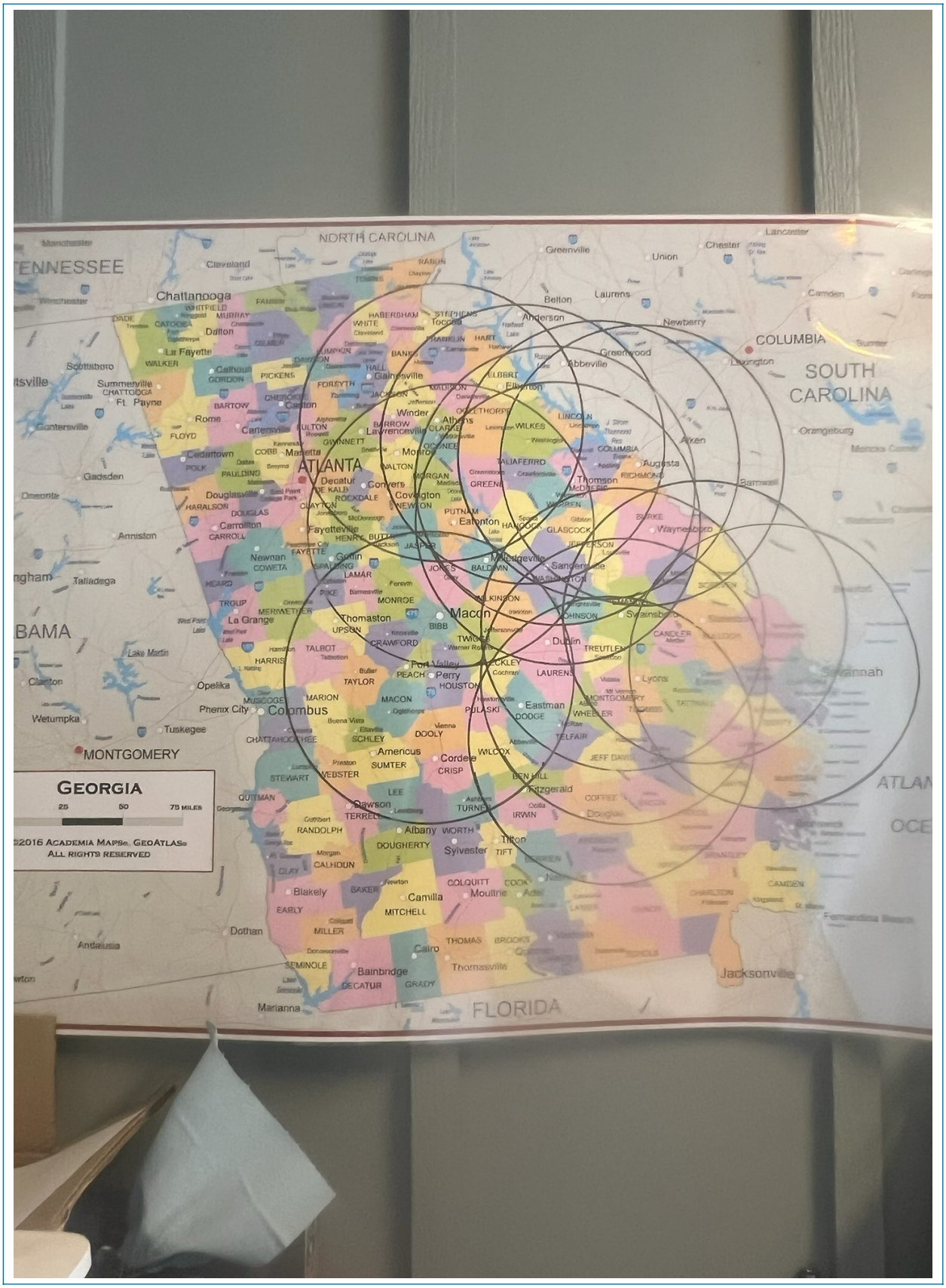
Guidance: Tables below have been generated automatically for each sourcing country based on the selection of ‘Feedstock origin (countries)’ in section 1 above.

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	SouthEast
Exclusions	
Feedstock types	Processing residues
Feedstock Product Groups	Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock

Is the forest managed to supply energy and non-energy markets?	N/A
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:	
The SBP Regional Risk Assessment for Private Forests in the Southeast US and the SBP Regional Risk Assessment for US National Forests have been completed and endorsed. The sourcing area falls completely within the jurisdiction of the RRA. Therefore, an SBE is not required at this time.	
Feedstock types included in SBE:	Processing residues
Includes EU RED SBE:	No
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	No
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	15.1000
Map(s) of the Supply Base area:	


NORTH CAROLINA
SOUTH CAROLINA
COLUMBIA
ATLANTA
Macon
Columbus
MONTGOMERY
Albany
Valdosta
Jacksonville
FLORIDA
GEORGIA
25 50 75 MILES
©2016 ACADEMIA MAPS®, GEOATLAS®
ALL RIGHTS RESERVED

2.3 Feedstock information

a. Total volume of Feedstock: 200,000-400,000 tonnes

b. Volume of primary feedstock: 0

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

Pinus taeda	Loblolly pine
Pinus palustris	Longleaf pine
Pinus elliottii	Slash pine
Pinus clausa	Sand pine
Pinus glabra	Spruce pine
Pinus serotina	Pond pine

d. Was the feedstock used in the biomass removed from a forest as part of a pest/disease control measure or a salvage operation? No

Explanation:

e. Hardwood (i.e. broadleaf trees): specify proportion of feedstock from (%): 0.00

f. Softwood (i.e. coniferous trees): specify proportion of feedstock from (%): 100.00

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 issued by a body exercising functions of a public nature and issued for use by sawmills in the area in which the wood was grown.

i. Roundwood from fellings from forests with > 40 yr rotation times - Average % volume of fellings delivered to BP (%): 0.00

j. Select forest type(s) where the primary feedstock was sourced from: 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:

m. Volume of processing residues feedstock: 200,000-400,000 tonnes
Physical form of the feedstock: Chips, Sawdust

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

o. Volume of post-consumer feedstock: 0
Physical form of the feedstock: Chips, Sawdust

p. Estimated amount of EU RED-compliant sustainable feedstock that could be collected annually by the BP: 100 %

q. What is the estimated amount of EU RED-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated): 6179248.00 m3

Explanation: LJR Supply Area: 15.10 million ha Area of Georgia and South Carolina: 162.2 million ha % of LJR Supply Area: (15.10/162.2) = 9.3% Total Annual Timber Harvest Volume for GA and SC: 66,443,527 66,443,527 x 9.3% = 6179248

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

The Plant Manager oversees and coordinates the SBE/RA to verify compliance of existing management systems, State level programs and forest practices against each of the SBP indicators, as identified in SBP Standard 1, Feedstock Compliance V2.1, utilizing Standard 2, Verification of SBP Compliant Feedstock V2.1. LJR Forest Products' Supply Base **falls within the** Regional Risk Assessments (RRAs) for National Forests and privately owned forests in primary sourcing regions of the US.

LJR Forest Products adopted of the FSC NRA as a primary resource to support identification of risk, as well as mitigation measures and monitoring. LJR Forest Products is, in all cases, two or more contracts removed from the Forest Management Unit (FMU). The verifiers or evidence of conformance have been developed to meet the requirements of Federal and State laws, and State BMP's. The verifiers contained in the SBE represent objective evidence of conformance that have been audited by an independent Certification Body accredited to conduct audits to the above Standards. Independent audits have involved stakeholder consultations and have provided feedback that the verifiers are appropriate and acceptable evidence of conformance to the SBP Standards.

LJR Forest Products has not specified any sub scopes within the SBE on the basis of limited geographic scope, consistency of regulatory framework, ownership patterns, homogeneity in management practices, cultural norms and biophysical conditions (habitat types, geology and other factors) within the supply basin and given that 100% of feedstock is comprised of secondary and tertiary sourcing.

The SBE employs a risk based approach (RBA) using the following basic steps:
a) Gathering information
b) Assessment of risk
c) Management of risk

Credible, recent and geographically relevant data were gathered about the defined supply basin, rather than individual forest units. Data analyzed included regulatory requirements, reports and data provided by local, state and federal governments, non-governmental organizations (NGOs) and consultation with experts and stakeholders. Determination of risk considered the likely impact of noncompliance, together with the probability of the noncompliance occurring.

The FSC US Controlled Wood National Risk Assessment (FSC NRA) V1.0, D3.0 as well as a range of other resources were utilized as the basis for the assessment of risk within the supply base evaluation. The FSC NRA was selected as core reference because of the robust multi stakeholder development process, general acceptance by stakeholders, the freshness of the resource and its prevailing use across the US forest products sector.

Consistent with requirements outlined in Standard 2, low risk was designated in cases where there was negligible risk of noncompliance with an indicator. Unspecified risk may be used for indicators in which evidence is

insufficient to categorize as low or specified risk. For indicators that cannot be specified as low risk or unspecified risk, specified risk is designated and corresponding mitigation measures are required. In the case of this assessment, all risks were categorized low or specified with application of required mitigation measures to reduce risk to low. For each risk rating a justification is provided, supported by adequate documentary evidence.

This SBR was undertaken with assistance from New March, LLC. The firm and individuals have the necessary knowledge and experience to evaluate against the SBP Feedstock Compliance Standard 1 in the local context of the US South. The competency of Sarah Crow was evaluated against the knowledge and competence requirements identified in in the SBP Version 2.1 Standards. Ms. Crow has extensive experience and knowledge of a wide array of forest certification and biomass sustainability standards, including SBP and have many years of experience in the ecological, social, legal and operational conditions of the US Southeast, as well as appropriate and required management, stakeholder engagement and report production skills. Biographies for key personnel are available upon request.

3.2 Conflicts with applicable national and sub-national legislation

No conflicts have been identified at this time.

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:	
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:	

The analysis suggests the ESA is a highly efficient system for the maintenance and enhancement of Federally listed threatened and endangered animal species. However, there is specified risk for the following due to lack of regulatory safeguards and/or resources/incentives for maintenance and enhancement of the following:

Nature Serve Network identified G1-G2 animal species not on the ESA threatened or endangered list, G1-G2 plant species
FSC US NRA identified species, ecosystems, and HCVs

Mitigation measure:

As specified in SBP-RRA-US-PF-FOR v1.2, assessment of HCVs and G1/G2 plant and animal species and ecosystems by forest type within supply basin, including primary and processing residue feedstocks:
Results of the assessment shall be integrated into a summary of management recommendations to support maintenance or enhancement of identified G1 and G2 species and ecosystems associated with forest types within the supply basin.
Results of the summary, including forest type-based management recommendations, shall be integrated into logger training curricula for company level or coordinated delivery to loggers within the supply region.
Requirement that suppliers enter binding written agreements that specify logger training inclusive of forest type-based management recommendations to maintain or enhance HCVs and G1/G2 species. This applies to both primary and processing residue suppliers.

Refinement of this specific direction in the application of LJR's program includes the following measures:
1. HCV/G1/G2 assessments for LJR's sourcing region; circulation to suppliers.
2. Contracts including provisions for use of trained loggers and use of BMPs, using sampling.
3. Supplier declarations or outbound correspondence specifying need for G1/G2 and HCV protections, inclusion of summaries with management recommendations.
4. Use of SFI Fiber Sourcing certificates by suppliers, where applicable.
5. Ongoing engagement of suppliers around key issues and use of G1/G2/HCV summaries.

These requirements apply to LJR and relevant operators in an ongoing way. See operator list.
Means of verification include:
1. HCV/G1/G2 assessments
2. Contracts including provisions for use of trained loggers and use of BMPs, using sampling.
3. Review of logger training curricula for salient content, using sampling.
4. Verification of logger training records, using sampling.
5. Supplier declarations or outbound correspondence specifying need for G1/G2 and HCV protections, inclusion of summaries with management recommendations.
6. Interviews of suppliers/foresters for knowledge of practices included in summaries, using sampling.
7. Review of a sample harvest sites for implementation consistent with management practices identified in the G1/G2/HCV summaries.
8. BMP monitoring at state level.
9. SFI Fiber Sourcing certificates, where applicable.

Monitoring and outcomes:

With initial implementation of the mitigation measures, LJR Forest Products incorporates monitoring into supplier verification program. Outcomes of mitigation are additionally monitored through the internal audit program of LJR Forest Products' certification programs.

Country: United States	
Area/sub-scope:	
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:	
While there is consensus that deforestation rates are quite low in the US and for the RRA geography, including LJR Forest Products' sourcing area, analysis of the USDA Forest Service's Forest Inventory and Analysis (FIA) data for the given time period indicates net loss of timberland for the RRA geography of less than 1% (0.75%) with localized losses and gains. Similarly, using a methodology based on population growth and issuance of housing permits, which is not based on change detection analysis of the forest itself, the FSC US NRA specified risk for a set of counties within the RRA's geography. Despite relatively low rates of forest loss, with recognition to the precedence of the FSC US NRA and the results of original analysis for the RRA's geography, risk is specified as it relates to forests for 46 counties identified by the 2019 FSC US NRA and a range of FIA Units identified in the RRA's Annexes.	
Mitigation measure:	
As specified in SBP-RRA-US-PF-FOR v1.2. To mitigate risk of sourcing feedstock from areas of forest converted to other land uses, biomass producers must secure binding written agreements with suppliers that prohibit the delivery of material originating from known conversions of forest to nonforest use. Refinement/articulation of this direction for LJR's program includes: 1. Contracts including provisions to avoid sourcing known conversions. 2. Supplier declarations or outbound correspondence prohibiting sourcing of feedstock from known conversions. 3. Request to suppliers for use geolocation for compliance with EUDR. These measures are applied to LJR and its relevant operators (see list) in an ongoing way.	

Means of verification include:
1. Contracts including provisions to avoid sourcing known conversions, using sampling.
2. Supplier declarations or outbound correspondence prohibiting sourcing of feedstock from known conversions, using sampling.
3. Interviews of suppliers/foresters for knowledge of requirements and action steps for identifying and avoiding conversions at the time of purchase, using sampling.
4. Review of geolocation samples on harvest tracts via suppliers.

Monitoring and outcomes:

LJR maintains a monitoring program and has defined an approach to annually evaluate the effectiveness of the RMP and RMMs, through sampling of its suppliers and evaluation of identified means of verification. This evaluation is designed to support continued refinement of the RMMs, as well as continuous improvement to the impact of the RMMs from a conservation perspective.

As of February 2026, on the basis of evaluation of suppliers that provide the majority of feedstock, measures are in place and objectively observable. Tools to support EUDR compliance enable monitoring and evaluation of risk. Known conversions post harvest were not observed. The mitigation measures appear effective. Ongoing implementation of program (as well as refinement, if appropriate) is recommended.

Country: United States

Area/sub-scope:

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:

Ecosystems enjoy protections under a range of laws, including the CWA and ESA, which are consistently implemented and enforced. However, ecosystems identified via species ranking of G1 and G2 under the

NatureServe Global Ranking system or the FSC NRA are not protected by law within the RRA's geography.

Thus, there is specified risk for:
Annex 1: Detailed findings for Supply Base Evaluation
Sustainable Biomass Program
Regional Risk Assessment for US Private Forest v1.2
-
Nature Serve Network identified G1-G2 animal species not on the ESA threatened or endangered list, G1-G2 plant species (Figure 2.1.3.-1)
-
FSC US NRA identified ecosystems (HCV3) (Figure 2.1.3.-2)

Mitigation measure:

As specified in SBP-RRA-US-PF-FOR v1.2, assessment of HCVs and G1/G2 plant and animal species and ecosystems by forest type within supply basin, including primary and processing residue feedstocks:
Results of the assessment shall be integrated into a summary of management recommendations to support maintenance or enhancement of identified G1 and G2 species and ecosystems associated with forest types within the supply basin.
Results of the summary, including forest type-based management recommendations, shall be integrated into logger training curricula for company level or coordinated delivery to loggers within the supply region.
Requirement that suppliers enter binding written agreements that specify logger training inclusive of forest type-based management recommendations to maintain or enhance HCVs and G1/G2 species. This applies to both primary and processing residue suppliers.

Refinement of this specific direction in the application of LJR's program includes the following measures:
1. HCV/G1/G2 assessments for LJR's sourcing region; circulation to suppliers.
2. Contracts including provisions for use of trained loggers and use of BMPs, using sampling.
3. Supplier declarations or outbound correspondence specifying need for G1/G2 and HCV protections, inclusion of summaries with management recommendations.
4. Use of SFI Fiber Sourcing certificates by suppliers, where applicable.
5. Ongoing engagement of suppliers around key issues and use of G1/G2/HCV summaries.

These requirements apply to LJR and relevant operators in an ongoing way. See operator list.

Means of verification includes:
1. HCV/G1/G2 assessments
2. Contracts including provisions for use of trained loggers and use of BMPs, using sampling.
3. Review of logger training curricula for salient content, using sampling.
4. Verification of logger training records, using sampling.
5. Supplier declarations or outbound correspondence specifying need for G1/G2 and HCV protections, inclusion of summaries with management recommendations.
6. Interviews of suppliers/foresters for knowledge of practices included in summaries, using sampling.
7. Review of a sample of harvest site for implementation consistent with management practices identified in the G1/G2/HCV summaries.
8. BMP monitoring at state level.
9. SFI Fiber Sourcing certs, where applicable.

Monitoring and outcomes:

LJR maintains a monitoring program and has defined an approach to annually evaluate the effectiveness of the RMP and RMMs, through sampling of its suppliers and evaluation of identified means of verification. This evaluation is designed to support continued refinement of the RMMs, as well as continuous improvement to the impact of the RMMs from a conservation perspective.

As of February 2026, on the basis of evaluation of suppliers that provide the majority of feedstock, measures are in place and objectively observable. Accounts provided via various interviews, documents reviewed and on the ground observations corroborated the approach as an effective means of mitigation. However, continued deepening implementation and emphasis of various aspects of the system including logger training credentials and robust knowledge of practices by forest type is encouraged and LJR is acting on additional steps, as well as continued evaluation across its supplier pool.

Country: United States	
Area/sub-scope:	
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:	
Upon the exit of the US from the Paris Agreement, a Level B risk assessment of the likelihood of depleting	

regional carbon stocks within LJR Forest Products' (hereafter “LJR”) supply basin was conducted. LJR sources processing residue from counties within Georgia and South Carolina. This responds directly to the need for a Level B analysis, as required by the Regional Risk Assessments for National Forests and US Private Forest under indicator 3.1.1 and the Renewable Energy Directive III (REDIII) under articles 29(7).

To develop this estimate, we used annualized state-level carbon stock inventories from the US RED III Level B LULUCF workbook and developed a modified workflow to scale these to a multi-state region aligning with the LJR fiber supply basin, inclusive of residuals and primary sourcing. Details of how this analysis was conducted can be found in a detailed report.

Results of this analysis indicate that forest carbon stocks are stable or increasing within LJR's supply basin, relative to a reference period. Recent inventory data, future projections, and the consistent nature of forest management practices in the southeastern US suggest that this trend will remain through the future long-term period of 2022-2053.

This report was prepared by New March by a qualified team with extensive knowledge of biomass feedstock sourcing, land use change, forests and forest carbon dynamics. The team included Sarah Crow, CEO of New March, a leading professional in the forest certification and sustainability space, Dr. Brian Clough, a data scientist and biometrician specializing in forest carbon, and Eric Werner, Forest Certification Specialist at New March, who brings operational knowledge of biomass material flows and certification programs. Dr. Clough is an expert in analyzing US Forest Service Forest Inventory and Analysis (FIA). The assessment was developed with high fidelity to the SBP Guidance for US REDIII Level B LULUCF v1.0 (February 3, 2026).

Mitigation measure:

No mitigation required.

Monitoring and outcomes:

Results of the analysis indicate that forest carbon stocks are stable or increasing within LJR’s supply basin, relative to a reference period. Recent inventory data, future projections, and the consistent nature of forest management practices in the southeastern US suggest that this trend will remain through the future long-term period of 2022-2053.

Country: United States

Area/sub-scope:

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:	
Upon the exit of the US from the Paris Agreement, a Level B risk assessment of the likelihood of depleting regional carbon stocks within LJR Forest Products' (hereafter "LJR") supply basin was conducted. LJR sources processing residue from counties within Georgia and South Carolina. This responds directly to the need for a Level B analysis, as required by the Regional Risk Assessments for National Forests and US Private Forest under indicator 3.1.1 and the Renewable Energy Directive III (REDIII) under articles 29(7). To develop this estimate, we used annualized state-level carbon stock inventories from the US RED III Level B LULUCF workbook and developed a modified workflow to scale these to a multi-state region aligning with the LJR fiber supply basin, inclusive of residuals and primary sourcing. Details of how this analysis was conducted can be found in a detailed report. Results of this analysis indicate that forest carbon stocks are stable or increasing within LJR's supply basin, relative to a reference period. Recent inventory data, future projections, and the consistent nature of forest management practices in the southeastern US suggest that this trend will remain through the future long-term period of 2022-2053. This report was prepared by New March by a qualified team with extensive knowledge of biomass feedstock sourcing, land use change, forests and forest carbon dynamics. The team included Sarah Crow, CEO of New March, a leading professional in the forest certification and sustainability space, Dr. Brian Clough, a data scientist and biometrician specializing in forest carbon, and Eric Werner, Forest Certification Specialist at New March, who brings operational knowledge of biomass material flows and certification programs. Dr. Clough is an expert in analyzing US Forest Service Forest Inventory and Analysis (FIA). The assessment was developed with high fidelity to the SBP Guidance for US REDIII Level B LULUCF v1.0 (February 3, 2026).	
Mitigation measure:	
No mitigation required.	
Monitoring and outcomes:	

Results of the analysis indicate that forest carbon stocks are stable or increasing within LJR's supply basin, relative to a reference period. Recent inventory data, future projections, and the consistent nature of forest management practices in the southeastern US suggest that this trend will remain through the future long-term period of 2022-2053.

4 Stakeholder engagement

4.1 General description

Biomass Producer's stakeholder engagement start date: 10 Aug 2026

Biomass Producer's stakeholder engagement end date: 10 Sep 2026

Total number of stakeholders contacted: 92

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

Stakeholder Engagement Plan (SEP) (Standard 4: 1.14, 1.16, 1.17 and 1.18)
LJR Forest Products has developed and implements a robust and multifaceted SEP that is appropriate for their business operations and scope of certification. The SEP is subject to both internal and third-party audits. Evidence of effective implementation of the SEP *(*such as meeting notes, email communications, records of participation in regional multi-stakeholder processes, responses to comments/feedback/complaints) shall be available for verification.
The SEP is monitored annually and is adapted as necessary to ensure its effectiveness. Evaluation of the plan occurs every five (5) years. The SEP is available, upon request, in a language(s) that is/are accessible for the identified affected stakeholders. Translations may require 4-6 weeks for availability, upon request.
Scope of the SEP The SEP applies to all operations concerning LJR Forest Products' SBP programming including operating sites, business offices and scope of their certificates.
Stakeholder Identification and Map (Standard 4: 1.14)
SBP defines a stakeholder as "person or organization that can affect, be affected by, or perceive themselves to be affected by a decision or activity." LJR Forest Products further considers the following factors:

- geographic proximity to the supply base
- expertise and knowledge of forestry and natural resources management
- a cross-section of industry, university and state agencies
- elected and appointed officials from the supply base area
- interested and affected conservation, environmental and social organizations within the supply base area

Using the SBP's definition, the above criteria and SBP Guidance provided for Standards 2 and 4, LJR Forest Products' Sustainability team has developed and maintains a stakeholder map (LJR-DP-05).
When Stakeholders are Engaged (Standard 2: 8.2 and 8.4)
LJR Forest Products engages with its stakeholders each time the SBE is revised and when a certificate is renewed. LJR Forest Products allows stakeholders at least one month to provide feedback before the SBE is finalized.
How Stakeholders are Engaged (Standard 2: 8.1)
As part of its SEP, when updating its SBE, LJR Forest Products engages with its stakeholders, with the specific intention of seeking feedback on its SBE, including its:

a. Supply Base Verifiers, if used.
b. Risk Assessment and risk ratings.
c. Risk Management Plan, Risk Management Measures and Means of Verification.

These aspects are largely prescribed by the SBP-endorsed Regional Risk Assessment (RRA) which overlaps with LJR Forest Products' supply area.
The consultation process is documented, including: the participants, how they were consulted, the results of the consultation, and the decisions taken.
The appropriate type(s) of engagement are identified for the range of stakeholders mapped. The type of engagement generally undertaken is that as a member of LJR Forest Products' Sustainability team distributes an

email to stakeholders identified in its stakeholder map. This email generally provides:

- a brief description of the SBP certification system, including link to the current version of SBP Standard
- a brief description of the purpose and scope of the SBE and risk assessment
- Access to drafts of the SBE
- A request for comments
- Timelines for the public stakeholder consultation period and anticipated completion of the SBE
- Contact details of LJR Forest Products Sustainability Manager

(Standard 2: 8.3) This approach allows LJR Forest Products to provide stakeholders with adequate information as a basis for informed comment but does not have to provide confidential information.

Stakeholder Comments and Response (Standard 2: 8.6)

LJR Forest Products maintains the following records:

- the Stakeholder map (lists of individuals/organizations) invited to comment
- copies of correspondence and/or comments received with respect to the SBE and its components
- justification for any information withheld on the grounds of confidentiality

(Standard 2: 8.5 and 8.7) LJR Forest Products seeks to address relevant stakeholder concerns; it is not required to achieve a consensus with stakeholders. The company will provide those stakeholders who engaged in the process with feedback on their comments and the revised Supply Base Report (SBR).

4.2 Response to stakeholder comments

5 Report updates and approval

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

Summary of changes: N/A

Name	Lige Moore
Title	Report author
Date of report approval	26 Sep 2025

Annex 1: Detailed findings for Supply Base Evaluation indicators

Annex 2: EU RED Supply Base Evaluation

Not Applicable (RED II SBE not included)

Annex 2a: EU RED II Supply Base Evaluation

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

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

Verification and monitoring of suppliers

Verification and Monitoring of Suppliers

1.1 LJR Forest Products conducts a verification process for its suppliers of primary, processing residues and post-consumer feedstocks. Eligibility for exemption from supply base assessment is evaluated per SBP Standard 2, Annex 1 and REDIII Article 29 (1). (ID REDIII 5.1.1)

1.2 The verification process includes an array of mutually supportive components.

a. LJR Forest Products maintains a list of all suppliers including the following elements:

- Name, contact person and address
- Type of supplier
- Category of feedstock supplied
- Level of control required and implemented (supplier audit, written agreements, visual inspections, etc.)
- Self-declaration that the feedstock qualifies as processing residues or post-consumer waste, if appropriate

When a new supplier relationship is established, the supplier is added to this Tracker document, along with relevant information, as each action is completed or element is verified. For more information, see LJR Forest Products' Operator Tracker. (ID REDIII 5.1.2)

b. LJR Forest Products monitors the conformance of its suppliers with SBP definitions and purchase specifications. The company maintains a plan for the handling of noncompliant feed stock or documentation, as articulated in its CoC procedure.

Feedstock Inspection and Classification Upon Receipt

2.1 Upon receipt, LJR Forest Products shall visually inspect all processing residues and or post-consumer feedstock and shall confirm their appropriate categorization, as articulated in its CoC procedure.

2.2 For all processing residues and post-consumer feedstock received, LJR Forest Products retains documentary evidence of the delivery and inspections carried out that confirmed that the feedstock complies with SBP definitions, as articulated in its CoC procedure. Different types of may include feedstock samples, pictures, quality analysis reports, invoices, delivery notes and/or shipping documents, depending on the feedstock concerned. (ID REDIII 5.2.1 and 5.2.2)

2.3 In cases where adequate evidence for the categorization of the feedstock as processing residues or post-consumer feedstock is not available at the point of receipt, LJR Forest Products shall include the supplier in the supplier audit sample and conformance with the relevant SBP requirements shall be confirmed prior to the feedstock being used. This approach aligns with LJR Forest Products' CoC procedure for nonconforming products. (ID REDIII 5.2.3)

2.4 In cases where feedstock received does not comply with purchase specifications and/or the quantities stated on the invoices are incorrect, LJR Forest Products takes immediate corrective actions, as articulated in its CoC procedure for nonconforming products. These actions shall be recorded and communicated to the Certification Body during the annual audit. (ID REDIII 5.2.4)

Feedstock inspection and classification upon receipt

Feedstock Inspection and Classification Upon Receipt

2.1 Upon receipt, LJR Forest Products shall visually inspect all processing residues and or post-consumer feedstock and shall confirm their appropriate categorization, as articulated in its CoC procedure.

2.2 For all processing residues and post-consumer feedstock received, LJR Forest Products retains documentary evidence of the delivery and inspections carried out that confirmed that the feedstock complies with SBP definitions, as articulated in its CoC procedure. Different types of may include feedstock samples, pictures, quality

analysis reports, invoices, delivery notes and/or shipping documents, depending on the feedstock concerned. (ID REDIII 5.2.1 and 5.2.2)
2.3 In cases where adequate evidence for the categorization of the feedstock as processing residues or post-consumer feedstock is not available at the point of receipt, LJR Forest Products shall include the supplier in the supplier audit sample and conformance with the relevant SBP requirements shall be confirmed prior to the feedstock being used. This approach aligns with LJR Forest Products' CoC procedure for nonconforming products. (ID REDIII 5.2.3)
2.4 In cases where feedstock received does not comply with purchase specifications and/or the quantities stated on the invoices are incorrect, LJR Forest Products takes immediate corrective actions, as articulated in its CoC procedure for nonconforming products. These actions shall be recorded and communicated to the Certification Body during the annual audit. (ID REDIII 5.2.4)

Supplier audit for processing residues and post-consumer feedstock

Feedstock Supplier Audit Program

3.1 LJR Forest Products performs at least annual on-site audit of its suppliers of processing residues and post-consumer feedstock, based on a justified sampling approach. (ID REDIII 5.3.1)
The annual audit sample considers risk factors including volume of fiber received by supplier, geography of sourcing, RRA and or SBE risk ratings and other factors. At least the square root of the total number of suppliers.
3.2 LJR Forest Products may conduct remote supplier audits of traders or sales offices that do not take physical possession of processing residues or post-consumer feedstock, and which do not alter, store or re-package the feedstock. (ID REDIII 5.3.2)
3.3 LJR Forest Products may employ qualified consultants or partners to implement supplier audits. (ID REDIII 5.3.3)
3.4 LJR Forest Products may rely on supplier audits conducted by others. In cases where the supplier selected for sampling sells processing residues or post-consumer feedstock that were previously collected, classified and traded by other companies or sites, the complete supply chain of these feedstock shall be audited back to the point where the categorization as processing residues or post-consumer feedstock can be demonstrated through objective evidence. (ID REDIII 5.3.4)
3.5 LJR Forest Products' supplier audit program evaluates and verifies documents and other evidence related to the quantity, quality and conformance with SBP definitions of processing residues and post-consumer feedstock, including:

- Supplier's instructions or procedures put in place to control and classify the processing residues and/or post-consumer feedstock
- When applicable, training or instructions provided to the supplier's personnel in relation to categorization and control of processing residues and/or post-consumer feedstock
- Evidence establishing feedstock origin (for example photographs, addresses of processing locations, invoices). (ID REDIII 5.3.5)

3.6 LJR Forest Products seeks additional evidence beyond a declaration from the supplier (even if part of the contractual agreement), as proof of origin and feedstock category. (ID REDIII 5.3.6)
3.7 LJR Forest Products documents supplier audits, including a record of audit date, findings, names and qualifications of auditors and examples of evidence concerning categorization of feedstock. (ID REDIII 5.3.7)

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).

Not Applicable (RED II TOF not included)

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).