

Supply Base Report: Curran Renewable Energy

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Completed in accordance with the Supply Base Report Template Version 1.2

*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: Curran Renewable Energy, LLC

Producer location: 20 Commerce Drive Massena, NY 13662

Geographic position: Latitude 44°54'32.53"N, Longitude 74°53'28.82"W

Primary contact: Kelli Curran Ramsey, 20 Commerce Drive Massena, NY 13662, 315-769-2000, kelli@curranpellets.com

Company website: www.curranpellets.com

Date report finalised: 10/Dec/2017

Close of last CB audit: 29/Jan/2018

Name of CB: SCS Global Services

Translations from English: No

SBP Standard(s) used: Standard 1 version 1.0, Standard 2 version 1.0, Standard 4 version 1.0, Standard 5 version 1.0

Weblink to Standard(s) used: <https://sbp-cert.org/documents/standards-documents/standards>

SBP Endorsed Regional Risk Assessment: not applicable

Weblink to SBE on Company website: <https://www.curranpellets.com>

Indicate how the current evaluation fits within the cycle of Supply Base Evaluations				
Main (Initial) Evaluation	First Surveillance	Second Surveillance	Third Surveillance	Fourth Surveillance
X	☐	☐	☐	☐

2 Description of the Supply Base

2.1 General description

All wood is supplied from New York State and Quebec, Canada south of the St. Lawrence Seaway. Ontario, Canada north to Route 101 and d117, towns of Val-d'Or, Kirkland Lake and Wawa, and west to Route 17, towns of Wawa and Sault Ste Marie. All wood is harvested through a whole tree harvesting operation. Most operations in this area are similar to this type with most of them producing energy quality chips, pulpwood and sawlogs. Land in this area is owned by private individuals, corporations, State of New York and Province of Quebec. The forests are comprised of hardwood, spruce-fir and pine species.

No species will be used if known to be on the CITES list. A yearly check will be performed to check the CITES list of any new species that would be of concern to Curran Renewable Energy, LLC.

All feedstock will be supplied as SBP-compliant Primary Feedstock. On occasion some of this material might be FSC Certified 100% otherwise it will be FSC Controlled Wood. The only supplier of this material is Seaway Timber Harvesting, Inc. Approximately 80% of the material is mixed hardwoods and approximately 20% is mixed softwood.

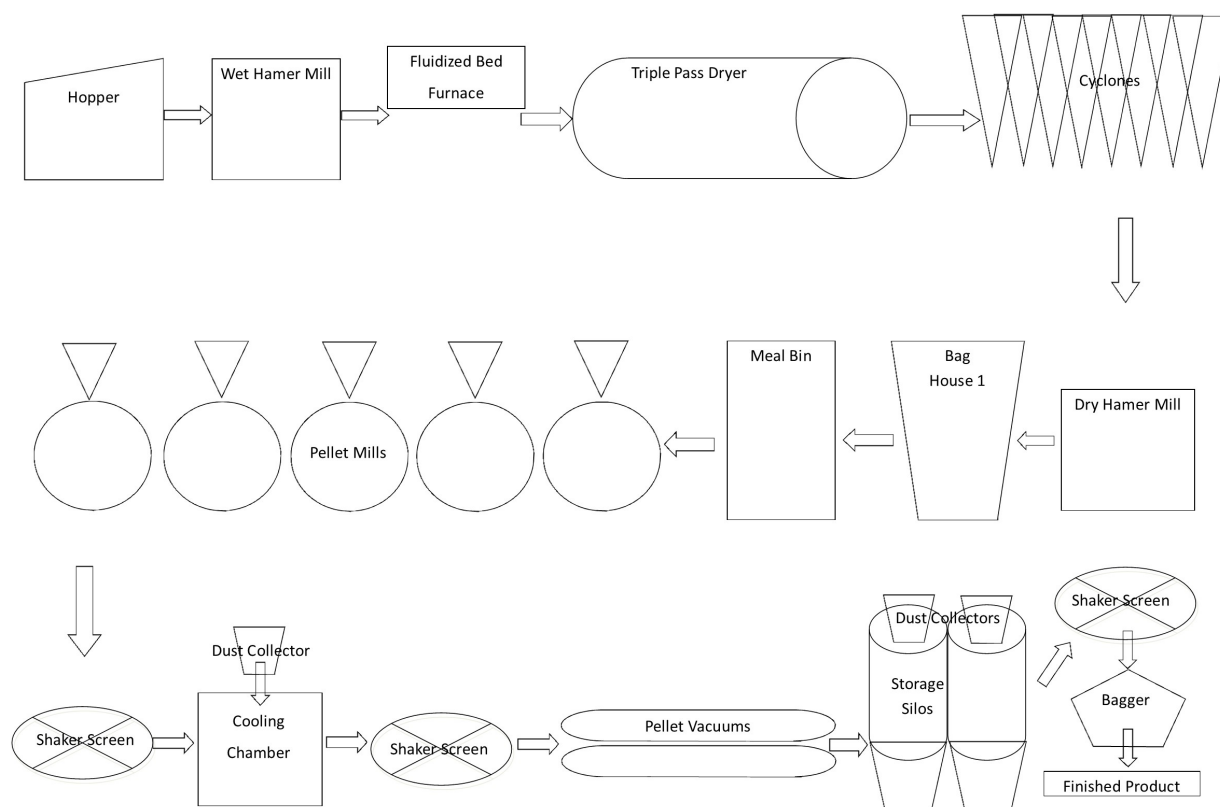
2.2 Actions taken to promote certification amongst feedstock supplier

Feedstock supplier is Seaway Timber Harvesting, Inc., sister company of Curran Renewable Energy, LLC. Curran Renewable Energy, LLC and Seaway Timber Harvesting, Inc. maintain FSC Chain of Custody Certification for their operations. Seaway Timber Harvesting owns timberland, some of which is FSC Forest Management Certified.

2.3 Final harvest sampling programme

N/A. All harvesting includes improvement harvests, thinnings, shelterwood harvests, seed tree harvests or individual and group selections. A majority of the harvests are conducted in conjunction with a Forester as part of a Forest Management Plan.

2.4 Flow diagram of feedstock inputs showing feedstock type [optional]



2.5 Quantification of the Supply Base

Supply Base

- Total Supply Base area (ha): 8,136,720.17 ha
- Tenure by type (ha): 5,695,704.12 ha privately owned and 2,441,016.05 ha public
- Forest by type (ha): 8,136,720.17 ha boreal
- Forest by management type (ha): approximately 4068360.09 ha managed natural and 4,068,360.09 ha natural
- Certified forest by scheme (ha): approximately 2,034,180.04 ha FSC

Feedstock

- Total volume of Feedstock: 300,000 tonnes
- Volume of primary feedstock: 300,000 tonnes
- List percentage of primary feedstock (g), by the following categories. -
 - Certified to SBP-approved Forest Management Scheme 30,000 tonnes
 - Not certified to SBP-approved Forest Management Scheme 270,000 tonnes

- i. List all species in primary feedstock, including scientific name – see attached list
- j. Volume of primary feedstock from primary forest - 300,000 tonnes
- k. List percentage of primary feedstock from primary forest (j), by the following categories.
 - Primary feedstock from primary forest certified to an SBP-approved Forest Management Scheme 10%
 - Primary feedstock from primary forest not certified to an SBP-approved Forest Management Scheme 90%
- l. Volume of secondary feedstock: N/A
- m. Volume of tertiary feedstock: N/A

3 Requirement for a Supply Base Evaluation

SBE completed	SBE not completed
X	☐

Curran Renewable Energy, LLC is seeking SBP Compliant, therefore the Supply Base Evaluation is required.

4 Supply Base Evaluation

4.1 Scope

The Supply Base Evaluation assessed all indicators, and all were deemed low risk. Curran Renewable Energy has had policies and procedures in place for the last 10 years to meet the FSC Certification Requirements. These policies and procedures assist the company in meeting the SBP requirements with a few additions. These policies and procedures were added and updated. Interviews were conducted with staff members to ensure that policies and procedures are implemented and followed accordingly.

4.2 Justification

Policies and procedures were reviewed, and staff were interviewed to verify policies and procedures were being implemented.

4.3 Results of Risk Assessment

All indicators were found to be low risk.

4.4 Results of Supplier Verification Programme

Seaway Timber Harvesting, Inc., sister company of Curran Renewable Energy, LLC, is the only supplier to Curran Renewable Energy, LLC. Both companies are run following the same policies and procedures.

4.5 Conclusion

Curran Renewable Energy, LLC meets the SBP requirements. All indicators were found to be low risk. All feedstock is sourced from within 100 miles of the pellet mill. All harvesting is conducted by Seaway Timber Harvesting, Inc. a sister company of Curran Renewable Energy, LLC. One of the companies' owners is present on all logging jobs daily to ensure contracts and BMP's are being followed. The company has a tracking system that tracks wood from the forest to the mill. Policies and procedures are in place and have been implemented for the last 10 years as part of the FSC Certification requirements. Curran Renewable Energy will have no issues ensuring that all specified feedstock are in full compliance with SBP Standards.

5 Supply Base Evaluation Process

The Supply Base Evaluation was conducted similar to the FSC Risk Assessment where knowledge of processes, policies and procedures were reviewed. In some cases references were made to websites and articles that assisted in justification.

The Supply Base Evaluation was completed by Kristin Ballou a consultant from Northwoods Forest Consultants, LLC Jay, NY. Kristin has been involved in assisting Curran Renewable Energy, LLC and Seaway Timber Harvesting, LLC with their FSC Certification since 2008. Kristin was hired to assist with the SBP Certification due to her experience working with both companies for the last 10 years and her familiarity with the FSC Certification process.

With Seaway Timber Harvesting, sister company to Curran Renewable Energy, LLC, being the only supplier, the risk is significantly lower for many of the indicators.

6 Stakeholder Consultation

Each Stakeholder was contacted through email. We included the Supply Base Report, Our company's policies, the stakeholder letter itself explaining our course of action and a map detailing our controlled wood area.

Stakeholder List:

As stakeholders, multiple representatives of governmental bodies, NGOs, research institutions, etc. were contacted.

Sloan Crawford – Forest Stewardship and Utilization Programs Lead – Adirondack Park Agency - Division of Lands and Forests – NYS Dept. of Environmental Conservation (DEC) - sloane.crawford@dec.ny.gov

6.1 Response to stakeholder comments

Provide a summary of all stakeholder comments received and how the comments were taken into consideration in the SBE process.

Comment 1: Sloan Crawford – Forest Stewardship and Utilization Programs Lead, NYS DEC

“Hi Kelli—

I want you to know the SBP notification you sent to the DEC website Adirondack Park mail box has been received. Consider DEC notified as a stakeholder.

I was not aware of this certification program so this gave me an opportunity to learn more about it. Very interesting. Obviously it's something you'll need if you're considering overseas export of pellets to Europe. It's interesting to me that the SBP is used in addition to FSC since apparently FSC doesn't cover enough aspects of biomass harvesting, etc... . I hope to learn more about this gap once I have time to sink my teeth into the principles, standards and processes of the program.

Well, I hope you and everyone there has a great Thanksgiving!

Sloane”

Response 1: Kelli Curran Ramsey – Curran Renewable Energy

“Thank you, Sloan, I am glad that you have received it. The certifying process is yes, required to be able to export to the industrial plants. Have a wonderful Thanksgiving!

-Kelli”

Comment 2:

Response 2:

7 Overview of Initial Assessment of Risk

All Indicators were deemed low risk during the Risk Assessment due to current management techniques and business structure.

Table 1. Overview of results from the risk assessment of all Indicators (prior to SVP)

Indicator	Initial Risk Rating		
	Specified	Low	Unspecified
1.1.1		X	
1.1.2		X	
1.1.3		X	
1.2.1		X	
1.3.1		X	
1.4.1		X	
1.5.1		X	
1.6.1		X	
2.1.1		X	
2.1.2		X	
2.1.3		X	
2.2.1		X	
2.2.2		X	
2.2.3		X	
2.2.4		X	
2.2.5		X	
2.2.6		X	
2.2.7		X	
2.2.8		X	
2.2.9		X	

Indicator	Initial Risk Rating		
	Specified	Low	Unspecified
2.3.1		X	
2.3.2		X	
2.3.3		X	
2.4.1		X	
2.4.2		X	
2.4.3		X	
2.5.1		X	
2.5.2		X	
2.6.1		X	
2.7.1		X	
2.7.2		X	
2.7.3		X	
2.7.4		X	
2.7.5		X	
2.8.1		X	
2.9.1		X	
2.9.2		X	
2.10.1		X	

8 Supplier Verification Programme

8.1 Description of the Supplier Verification Programme

Seaway Timber Harvesting, Inc, sister company of Curran Renewable Energy, LLC is the only supplier. One of the company owners is onsite at the logging jobs daily to ensure contracts and BMP's are being followed. Trip tickets are completed for every load of wood leaving the forest and the ticket accompanies the load to the mill. Seaway Timber Harvesting signs a contract with all landowners where harvests are conducted.

8.2 Site visits

Seaway Timber Harvesting, Inc. completes a Pre-Harvest Environmental Assessment form for each, harvest, to identify and potential resource concerns. Site visits are conducted daily by company owners to ensure policies, procedures, BMP's and harvest contracts are being followed.

8.3 Conclusions from the Supplier Verification Programme

All indicators were found to be low risk.

9 Mitigation Measures

9.1 Mitigation measures

All Indicators were deemed low risk during the Risk Assessment due to current management techniques and business structure.

9.2 Monitoring and outcomes

All indicators will be reviewed annually to ensure that the risk designation has not changed. If the risk does change during the annual review then appropriate measures will be taken to mitigate and address potential threats.

10 Detailed Findings for Indicators

Detailed findings for each Indicator are given in Annex 1.

11 Review of Report

11.1 Peer review

N/A

11.2 Public or additional reviews

N/A

12 Approval of Report

Approval of Supply Base Report by senior management			
Report Prepared by:	<i>Kristin Ballou</i>	<i>Consultant</i>	<i>12/10/2017</i>
	Name	Title	Date
The undersigned persons confirm that I/we are members of the organisation's senior management and do hereby affirm that the contents of this evaluation report were duly acknowledged by senior management as being accurate prior to approval and finalisation of the report.			
Report approved by:	<i>Patrick Curran</i>	<i>President</i>	<i>09/05/2018</i>
	Name	Title	Date
Report approved by:	<i>[name]</i>	<i>[title]</i>	<i>[date]</i>
	Name	Title	Date
Report approved by:	<i>[name]</i>	<i>[title]</i>	<i>[date]</i>
	Name	Title	Date

13 Updates

N/A

Annex 1: Detailed Findings for Supply Base Evaluation Indicators

	Indicator
1.1.1	The Biomass Producer's Supply Base is defined and mapped.
Finding	All wood is supplied from New York State and Quebec, Canada south of the St. Lawrence Seaway. Ontario, Canada north to Route 101 and 117, towns of Val-d'Or, Kirkland Lake and Wawa, and west to Route 17, towns of Wawa and Sault Ste Marie. All wood is harvested through a whole tree harvesting operation. Most operations in this area are similar to this type with most of them producing energy quality chips, pulpwood and sawlogs. Land in this area is owned by private individuals, corporations, State of New York and Province of Quebec. The forests are comprised of hardwood, spruce-fir and pine species. All wood products leaving the forest must have a trip ticket accompanying them. Curran Renewable Energy, LLC requires that all load tickets include the landowners name, road name, town, county, certification type, product, species and location delivered to.
Means of Verification	Review trip tickets
Evidence Reviewed	See Map and trip tickets
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
1.1.2	Feedstock can be traced back to the defined Supply Base.
Finding	All suppliers of Curran Renewable Energy, LLC will be required to provide a load ticket for all raw material being purchased by Curran Renewable Energy, LLC. One of these tickets will be submitted to Curran Renewable Energy, LLC for approval. The required information needed on the ticket is date loaded, land owner, road name, town, county, driver, FSC Certification if applicable, product (Roundwood, chips, etc), species and location delivered to. All feedstock can be linked back to contracts between the landowner and Seaway Timber Harvesting, Inc. Upon receipt of material or prior to further use or processing Curran Renewable Energy, LLC will check the suppliers invoice and supporting documentation to ensure the following:

	a.) the supplied material quantities and quality are in compliance with the supplied documentation; b) the material category and credit claim is stated for each product item or for the total products; c) the supplier's FSC Chain of Custody or FSC Controlled Wood code is quoted for material supplied with FSC claims. d) material is weighed and volume entered into the input records system Seaway Timber Harvesting Inc. and Curran Renewable Energy, LLC have formulated an agreement for Seaway Timber Harvesting, Inc. to use Curran Renewable Energy, LLC's yard for storage of raw material. Curran Renewable Energy, LLC will purchase some of this raw material from Seaway Timber Harvesting, Inc. for the production of pellets. The raw material not purchased by Curran Renewable Energy, LLC will be removed and sold elsewhere by Seaway Timber Harvesting, Inc. Seaway Timber Harvesting, Inc. maintains a database that includes volumes and products of wood harvested by property and the amount paid.
Means of Verification	Load tickets, suppliers invoice, database and supporting documentation
Evidence Reviewed	Load tickets, suppliers invoice, database and supporting documentation
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
1.1.3	The feedstock input profile is described and categorised by the mix of inputs.
Finding	All feedstock will be supplied as SBP-compliant Primary Feedstock. On occasion some of this material might be FSC Certified 100% otherwise it will be FSC Controlled Wood. The only supplier of this material is Seaway Timber Harvesting, Inc. Approximately 80% of the material is mixed hardwoods and approximately 20% is mixed softwood.
Means of Verification	Load tickets, suppliers invoice, database and supporting documentation
Evidence Reviewed	Load tickets, suppliers invoice, database and supporting documentation
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
1.2.1	The Biomass Producer has implemented appropriate control systems and procedures to ensure that legality of ownership and land use can be demonstrated for the Supply Base.
Finding	Feedstock supplier is Seaway Timber Harvesting, Inc., sister company of Curran Renewable Energy, LLC. All feedstock can be linked back to contracts between the landowner and Seaway Timber Harvesting, Inc. All suppliers of Curran Renewable

	Energy, LLC will be required to provide a load ticket for all raw material being purchased by Curran Renewable Energy, LLC. One of these tickets will be submitted to Curran Renewable Energy, LLC for approval. The required information needed on the ticket is date loaded, land owner, road name, town, county, driver, FSC Certification if applicable, product (Roundwood, chips, etc), species and location delivered to.
Means of Verification	Timber harvest contracts, load tickets
Evidence Reviewed	Timber harvest contracts, load tickets
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
1.3.1	The BP has implemented appropriate control systems and procedures to ensure that feedstock is legally harvested and supplied and is in compliance with EUTR legality requirements.
Finding	There are no large scale problems with timber theft or any reports of significant levels of illegal harvesting in New York State. Small scale timber theft has been increasingly reported throughout the state over the last few years due to the high timber values. New York State recently passed an improved timber trespass law which cracks down on illegal harvesting and timber theft (website listed below). If a timber theft or trespass occurred and the wood was purchased by Curran Renewable Energy, LLC, if feasible, the company will work with law enforcement to track whom or where the wood may have come from. Seaway Timber Harvesting, Inc. has signed timber sale contracts with all landowners for harvests on public and private lands. There are no large scale problems with timber theft, deforestation or any reports of significant levels of illegal harvesting in Ontario or Quebec, Canada. Existing legal structures exist to enforce theft. In Quebec and Ontario the governments publicly list peoples or organizations that broke the laws. Ontario has a system in place for reinforcing forest laws. In Quebec and Ontario licenses and permits are granted for harvesting on crown lands. This area is a majority of the land in Canada and also where a majority of the harvesting takes place. There are well enforced laws which are administered to prevent and prosecute illegal logging in these areas. Illegal logging is not currently an issue in Ontario or Quebec, Canada. This is due to the countries multi-faceted governance structure for sustainable forest management. This governance structure includes well-developed public policies, legislation and regulations, enforcement, regular monitoring, and public reporting. However, Canada does recognize the importance of illegal logging as a global environmental, social and economic issue. Canada is committed to working with international organizations to help combat illegal logging and find solutions that will minimize its impacts on the world's forests, forest people, and forest product markets. The 2010 Corruption Perception Index(CPI) for Canada is 82 and the United States is 74. The CPI is on a scale of 1-100 with anything over 50 being considered low risk.
Means of Verification	http://www.nysenate.gov/report/timber-theft-new-york and http://www.illegal-logging.info/index.php , searched for information relating to timber trespass laws in New York state and locations of widespread logging. http://www.mnr.gov.on.ca/en/index.html searched for information relating to timber trespass laws in Canada and locations of widespread logging. http://wwf.panda.org/what_we_do/footprint/forestry/forest_illegal_logging/ searched for

	illegal logging and deforestation in Canada. http://www.transparency.org Corruption Perception Index (CPI).
Evidence Reviewed	http://www.nysenate.gov/report/timber-theft-new-york and http://www.illegal-logging.info/index.php , searched for information relating to timber trespass laws in New York state and locations of widespread logging. http://www.mnr.gov.on.ca/en/index.html searched for information relating to timber trespass laws in Canada and locations of widespread logging. http://www.panda.org/what we do/footprint/forestry/forest illegal logging/ searched for illegal logging and deforestation in Canada. http://www.transparency.org Corruption Perception Index (CPI).
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
1.4.1	The Biomass Producer has implemented appropriate control systems and procedures to verify that payments for harvest rights and timber, including duties, relevant royalties and taxes related to timber harvesting, are complete and up to date.
Finding	Seaway Timber Harvesting, Inc. maintains a database that includes volumes and products of wood harvested by property and the amount paid.
Means of Verification	Database, timber sale contracts, load tickets
Evidence Reviewed	Database, timber sale contracts, load tickets
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
1.5.1	The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is supplied in compliance with the requirements of CITES.
Finding	No species will be used if known to be on the CITES list. A yearly check will be performed to check the CITES list of any new species that would be of concern to Curran Renewable Energy, LLC. Curran Renewable Energy maintains a maintains a list of species that are accepted at the facility. This list is annually reviewed with Seaway Timber Harvesting, Inc.
Means of Verification	Species List
Evidence Reviewed	Species List
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
1.6.1	The Biomass Producer has implemented appropriate control systems and procedures to ensure that feedstock is not sourced from areas where there are violations of traditional or civil rights.
Finding	Based on international sources and reports there are not any known problems with Indigenous and Tribal peoples. Canada employs a complaints mechanism which is a recognized process for resolution of complaints and allegations for the Indian and Northern affairs. The Tribal and Forest Protection Act was passed in 2004 which enables the tribes to propose work and agreements with the USFS to reduce the threat of Indian Trust Lands. The Lacey Act makes it is unlawful to import, export, sell, acquire, or purchase fish, wildlife or plants that are taken, possessed, transported, or sold in violation of U.S. or Indian law, or in interstate or foreign commerce involving any fish, wildlife, or plants taken possessed or sold in violation of State or foreign law.
Means of Verification	http://www.ilo.org/global/topics/equality-and-discrimination/indigenous-and-tribal-peoples/lang--en/index.htm searched for violations of the ILO Convention 169 on Indigenous Tribes. http://www.gcc.ca/archive/article.php?id=36 searched for civil rights violated by forestry, Quebec a violation of civil rights in northern Quebec. Most of the fiber will come from central and southern Quebec and will not interfere with the Cree Rights.
Evidence Reviewed	http://www.ilo.org/global/topics/equality-and-discrimination/indigenous-and-tribal-peoples/lang--en/index.htm searched for violations of the ILO Convention 169 on Indigenous Tribes. http://www.gcc.ca/archive/article.php?id=36 and https://www.fws.gov/international/laws-treaties-agreements/us-conservation-laws/lacey-act.html searched for civil rights violated by forestry, Quebec a violation of civil rights in northern Quebec. Most of the fiber will come from central and southern Quebec and will not interfere with the Cree Rights.
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.1.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that forests and other areas with high conservation values are identified and mapped.
Finding	None of the wood source areas are considered to be located within the Global 200 Ecoregion. According to National Geographic there are no Ecoregions in New York State. Frontier forests currently exist in the United States but none of them exist in New York. Large intact forest landscapes also exist in the United States and in New York State. Two areas of Large Intact Forests are found in the high peaks region in the Adirondack Park. These areas are owned by NYS and are deemed forever wild. No forest management is conducted on forestland owned by New York State within the Adirondack Park as it is classified as Preserve Land and is Forever Wild. There are also areas of large intact forest landscapes found in Canada within the sourcing area. At this time all wood is sourced from New York State. Prior to wood being sourced from Canada, Curran Renewable Energy will review the large intact forest landscape maps to ensure that wood will not be sourced from these areas. According to Conservation International there are no biodiversity hotspots in New York State. New York State heavily regulates timber harvesting within the Adirondack Park. There are many state and federal regulations pertaining to possible impacts on water quality known as best management practices or BMP's. BMP's are used as harvesting regulations within a forested wetland inside and outside of the Adirondack Park. The governing body of the APA oversees harvesting in

	river corridors, forested wetlands and upland clear cutting. NYS Department of Environmental Conservation regulates the harvesting of wetlands outside the Adirondack Park. The New York Natural Heritage Program helps to facilitate the conservation of rare animals, rare plants and natural ecosystems within the state the program hopes to help others engage in compatible management activities around our most jeopardized species, ecosystems, and high-quality natural areas, in order to have significant and lasting effects on the preservation of New York's biodiversity. Canada, Russia and Brazil's boreal forests contain the three largest frontier forests remaining on the planet. Canada contains large areas of relatively undisturbed forest areas which are sufficiently large enough to maintain all of their native biodiversity. Frontier forests and large intact forest landscapes currently exist in Canada. Of these large intact forest landscapes the national and provincial parks systems protects only seven percent. Canada heavily regulates timber harvesting within the Crown lands which equals 41% is federal crown land and 48% is provincial crown land. Legislation in Canada has been designed specifically to directly promote wetland protection. Throughout Canada there are approximately 153 million ha of wetlands. One-third of these wetlands are under some form of environmental regulation and about three quarters are covered under non-regulatory wetland conservation and management programs and policies established by government and industry sectors. While working with many partners including over 1700 private landowners Ducks Unlimited Canada has conserved over 900,000 acres of wetland habitat in Ontario including the Boreal Forest, Lower Great Lakes Coastal Areas and the Southern Ontario Agricultural Region along with 363 acres of wetland habitat east of Ottawa. This area was threatened by development along the Ottawa River. Ducks Unlimited Canada worked with Québec Wildlife and Parks and eleven landowners. There are many provincial and federal regulations pertaining to possible impacts on water quality. Ontario has developed wetland conservation policies which describe how wetlands will be dealt with through the provincial Planning Act. The federal government has substantial authority over wetlands.
Means of Verification	http://www.dec.ny.gov/animals/29338.html (New York Natural Heritage Program). http://www.dec.ny.gov/animals/38801.html (Environmental Resource Mapper) shows areas of high conservation value. http://www.worldwildlife.org/wildworld/profiles/terrestrial/na/na0407_full.html searched for New York State Ecoregions. http://www.intactforests.org/world.map.html searched for areas with large intact forest landscapes. http://www.dec.ny.gov/lands/37845.html (NYS Best Management Practices). http://www.cnrs.fr/inee/recherche/fichiers/Biodiversite_hotspots.pdf Conservation International Biodiversity Hotspots. http://www.worldwildlife.org/science/ecoregions/item1847.html searched for Global 200 Ecoregions in the United States. http://www.intactforests.org/ areas with large intact forests. http://www.mnr.gov.on.ca/en/Business/Forests/2ColumnSubPage/STEL02_163862.html Ontario's forestry laws. http://www2.publicationsduquebec.gouv.qc.ca/...telecharge.php? Quebec's forestry laws. http://www.ec.gc.ca/tho-wlo/ Ontario's wetland regulations. http://www.ducks.ca/places/ontario/ Ontario's wetland conservation DUC. http://www.ducks.ca/places/quebec/ Quebec's wetland conservation DUC. http://www.globalforestwatch.ca/ Global Forest Watch Canada's Wild Forest
Evidence Reviewed	http://www.dec.ny.gov/animals/29338.html (New York Natural Heritage Program). http://www.dec.ny.gov/animals/38801.html (Environmental Resource Mapper) shows areas of high conservation value. http://www.worldwildlife.org/wildworld/profiles/terrestrial/na/na0407_full.html searched for New York State Ecoregions. http://www.intactforests.org/world.map.html searched for areas with large intact forest landscapes. http://www.dec.ny.gov/lands/37845.html (NYS Best Management Practices). http://www.cnrs.fr/inee/recherche/fichiers/Biodiversite_hotspots.pdf Conservation International Biodiversity Hotspots. http://www.worldwildlife.org/science/ecoregions/item1847.html searched for Global 200

	Ecoregions in the United States. http://www.intactforests.org/ areas with large intact forests. http://www.mnr.gov.on.ca/en/Business/Forests/2ColumnSubPage/STEL02_163862.html Ontario's forestry laws. http://www2.publicationsduquebec.gouv.qc.ca/...telecharge.php? Quebec's forestry laws. http://www.ec.gc.ca/tho-wlo/ Ontario's wetland regulations. http://www.ducks.ca/places/ontario/ Ontario's wetland conservation DUC. http://www.ducks.ca/places/quebec/ Quebec's wetland conservation DUC. http://www.globalforestwatch.ca/ Global Forest Watch Canada's Wild Forest
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.1.2	The Biomass Producer has implemented appropriate control systems and procedures to identify and address potential threats to forests and other areas with high conservation values from forest management activities.
Finding	None of the wood source areas are considered to be located within the Global 200 Ecoregion. According to National Geographic there are no Ecoregions in New York State. Frontier forests currently exist in the United States but none of them exist in New York. Large intact forest landscapes also exist in the United States and in New York State. Two areas of Large Intact Forests are found in the high peaks region in the Adirondack Park. These areas are owned by NYS and are deemed forever wild. No forest management is conducted on forestland owned by New York State within the Adirondack Park as it is classified as Preserve Land and is Forever Wild. There are also areas of large intact forest landscapes found in Canada within the sourcing area. At this time all wood is sourced from New York State. Prior to wood being sourced from Canada, Curran Renewable Energy will review the large intact forest landscape maps to ensure that wood will not be sourced from these areas. According to Conservation International there are no biodiversity hotspots in New York State. New York State heavily regulates timber harvesting within the Adirondack Park. There are many state and federal regulations pertaining to possible impacts on water quality known as best management practices or BMP's. BMP's are used as harvesting regulations within a forested wetland inside and outside of the Adirondack Park. The governing body of the APA oversees harvesting in river corridors, forested wetlands and upland clear cutting. NYS Department of Environmental Conservation regulates the harvesting of wetlands outside the Adirondack Park. The New York Natural Heritage Program helps to facilitate the conservation of rare animals, rare plants and natural ecosystems within the state the program hopes to help others engage in compatible management activities around our most jeopardized species, ecosystems, and high-quality natural areas, in order to have significant and lasting effects on the preservation of New York's biodiversity. Canada, Russia and Brazil's boreal forests contain the three largest frontier forests remaining on the planet. Canada contains large areas of relatively undisturbed forest areas which are sufficiently large enough to maintain all of their native biodiversity. Frontier forests and large intact forest landscapes currently exist in Canada. Of these large intact forest landscapes the national and provincial parks systems protects only seven percent. Canada heavily regulates timber harvesting within the Crown lands which equals 41% is federal crown land and 48% is provincial crown land. Legislation in Canada has been designed specifically to directly promote wetland protection. Throughout Canada there are approximately 153 million ha of wetlands. One-third of these wetlands are under some form of environmental regulation and about three quarters are covered under non-regulatory wetland conservation and management programs and policies established by government and industry sectors. While working with many partners including over 1700

	private landowners Ducks Unlimited Canada has conserved over 900,000 acres of wetland habitat in Ontario including the Boreal Forest, Lower Great Lakes Coastal Areas and the Southern Ontario Agricultural Region along with 363 acres of wetland habitat east of Ottawa. This area was threatened by development along the Ottawa River. Ducks Unlimited Canada worked with Québec Wildlife and Parks and eleven landowners. There are many provincial and federal regulations pertaining to possible impacts on water quality. Ontario has developed wetland conservation policies which describe how wetlands will be dealt with through the provincial Planning Act. The federal government has substantial authority over wetlands.
Means of Verification	http://www.dec.ny.gov/animals/29338.html (New York Natural Heritage Program). http://www.dec.ny.gov/animals/38801.html (Environmental Resource Mapper) shows areas of high conservation value. http://www.worldwildlife.org/wildworld/profiles/terrestrial/na/na0407_full.html searched for New York State Ecoregions. http://www.intactforests.org/world.map.html searched for areas with large intact forest landscapes. http://www.dec.ny.gov/lands/37845.html (NYS Best Management Practices). http://www.cnrs.fr/inee/recherche/fichiers/Biodiversite_hotspots.pdf Conservation International Biodiversity Hotspots. http://www.worldwildlife.org/science/ecoregions/item1847.html searched for Global 200 Ecoregions in the United States. http://www.intactforests.org/ areas with large intact forests. http://www.mnr.gov.on.ca/en/Business/Forests/2ColumnSubPage/STEL02_163862.html Ontario's forestry laws. http://www2.publicationsduquebec.gouv.qc.ca/...telecharge.php? Quebec's forestry laws. http://www.ec.gc.ca/tho-wlo/ Ontario's wetland regulations. http://www.ducks.ca/places/ontario/ Ontario's wetland conservation DUC. http://www.ducks.ca/places/quebec/ Quebec's wetland conservation DUC. http://www.globalforestwatch.ca/ Global Forest Watch Canada's Wild Forest
Evidence Reviewed	http://www.dec.ny.gov/animals/29338.html (New York Natural Heritage Program). http://www.dec.ny.gov/animals/38801.html (Environmental Resource Mapper) shows areas of high conservation value. http://www.worldwildlife.org/wildworld/profiles/terrestrial/na/na0407_full.html searched for New York State Ecoregions. http://www.intactforests.org/world.map.html searched for areas with large intact forest landscapes. http://www.dec.ny.gov/lands/37845.html (NYS Best Management Practices). http://www.cnrs.fr/inee/recherche/fichiers/Biodiversite_hotspots.pdf Conservation International Biodiversity Hotspots. http://www.worldwildlife.org/science/ecoregions/item1847.html searched for Global 200 Ecoregions in the United States. http://www.intactforests.org/ areas with large intact forests. http://www.mnr.gov.on.ca/en/Business/Forests/2ColumnSubPage/STEL02_163862.html Ontario's forestry laws. http://www2.publicationsduquebec.gouv.qc.ca/...telecharge.php? Quebec's forestry laws. http://www.ec.gc.ca/tho-wlo/ Ontario's wetland regulations. http://www.ducks.ca/places/ontario/ Ontario's wetland conservation DUC. http://www.ducks.ca/places/quebec/ Quebec's wetland conservation DUC. http://www.globalforestwatch.ca/ Global Forest Watch Canada's Wild Forest
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.1.3	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not sourced from forests converted to production plantation forest or non-forest lands after January 2008.

Finding	Widespread planting of red pine and white pine took place in the 1930's in New York and the lake states. Most of this planting was done by the CCC. The planting was done on land that was abandoned by agriculture, cutover forest land and land that was destroyed by wild fires. Most of these areas were not intensively managed except due to harvesting and are considered planted forests rather than plantations. Over 2/3 of New York's land is covered by forests and woodlands. Conservation easements have been purchased throughout the state to help prevent the development of some of the forested land. The rate of residential development has dramatically increased since the 1980's primarily in vacation homes. Within the Adirondack Park, the Adirondack Park Agency regulates development and development density. Below is a chart representing the amount of forest land around the state which came from the New York State Forest Stewardship Plan for 2003-2008. According to The Empire State's Forests-- Trends in a Robust Resource the forest lands in New York have increased by 23% since 1953. In New York alone there are 18.6 million acres of forested land. In Canada less than 1% of forested area is harvested annually. In 2005, less than 0.02% of Canada's forests were deforested at this rate Canada's deforestation accounts for only 0.4% of global deforestation. In Ontario and Quebec the law states that all forests must be regenerated. The extent and change of forest area is reported to be unchanged from 1990-2005. There are many areas of deforestation in Canada. Over the past 30 years, annual deforestation rates have been decreasing. A portion of this deforestation is offset by increases in forest area due to the planting of new areas of forest. Deforestation is a major issue around the world because it reduces biodiversity, affects water and soil quality, and is an important contributor to climate change. It still makes sense to try and reduce deforestation where possible even though the rate of deforestation in Canada is quite low. In Canada many trees are planted annually. This is not considered afforestation or plantation management because these areas are not heavily managed, many of these areas are many Christmas tree and apple plantations. About 50% of harvested areas on Crown lands are regenerated through planting and direct seeding and the remaining 50% are regenerated naturally. In June 2008, almost 138 million hectares of Canada's forests were certified as being sustainably managed by one or more of three globally recognized certification standards. According to the State of the World's Forests 2011 Canada has neither gained nor lost forest area from 1990-2010.
Means of Verification	http://www.fao.org/DOCREP/ARTICLE/WFC/XII/0325-B1.HTM searched for natural forests converted to plantations in New York State. http://www.dec.ny.gov/lands/5242.html (New York State DEC timber Harvesting guidelines). http://www.apa.ny.gov/Documents/Laws_Regs/APAACT.PDF (Adirondack Park Agency Act). http://www.apa.state.ny.us/Documents/Guidelines/CitizensGuide.pdf (Adirondack Park Agency Citizens Guide to land use regulations). http://www.fs.fed.us/ne/newtown_square/publications/brochures/pdfs/state_forests/ny_forest.pdf searched for annual net growth of forests in New York. http://cfs.nrcan.gc.ca/pubwarehouse/pdfs/28159.pdf deforestation in Canada b. b. Arseneau, C., & Chiu, M. (2003). Canada - A Land of Plantations? <i>UNFF Intersessional Experts Meeting on the Role of Planted Forests in Sustainable Forest Management</i>, (pp. 116-126). New Zealand. http://cfs.nrcan.gc.ca/pubwarehouse/pdfs/34055.pdf Natural Resources Canada Annual Report 2012. http://www.fao.org/docrep/016/i3010e/i3010e.pdf State of The World's Forests 2012
Evidence Reviewed	http://www.fao.org/DOCREP/ARTICLE/WFC/XII/0325-B1.HTM searched for natural forests converted to plantations in New York State. http://www.dec.ny.gov/lands/5242.html (New York State DEC timber Harvesting guidelines). http://www.apa.ny.gov/Documents/Laws_Regs/APAACT.PDF (Adirondack Park Agency Act). http://www.apa.state.ny.us/Documents/Guidelines/CitizensGuide.pdf (Adirondack Park Agency

	Citizens Guide to land use regulations). http://www.fs.fed.us/ne/newtown_square/publications/brochures/pdfs/state_forests/ny_forest.pdf searched for annual net growth of forests in New York. http://cfs.nrcan.gc.ca/pubwarehouse/pdfs/28159.pdf deforestation in Canada b. b. Arseneau, C., & Chiu, M. (2003). Canada - A Land of Plantations? <i>UNFF Intersessional Experts Meeting on the Role of Planted Forests in Sustainable Forest Management</i>, (pp. 116-126). New Zealand. http://cfs.nrcan.gc.ca/pubwarehouse/pdfs/34055.pdf Natural Resources Canada Annual Report 2012. http://www.fao.org/docrep/016/i3010e/i3010e.pdf State of The World's Forests 2012
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.2.1	The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them.
Finding	Seaway Timber Harvesting has a Pre-Harvest Environmental/Social Assessment Form that they complete for all feedstock sourced to Curran Renewable Energy
Means of Verification	Pre-Harvest Environmental/Social Assessment Form
Evidence Reviewed	Pre-Harvest Environmental/Social Assessment Form
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.2.2	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b).
Finding	Seaway Timber Harvesting has a Pre-Harvest Environmental/Social Assessment Policy and Form that they complete for all feedstock sourced to Curran Renewable Energy. This form ensures that all soil disturbing activities, including, road, landing and trail construction, are conducted only during periods of weather when soil compaction, rutting and surface erosion can be adequately controlled and that Best Management Practices are being followed. Seaway Timber Harvesting is the only supplier to Curran Renewable Energy. One of the company owners is onsite daily at every harvesting site to ensure these procedures are in place.
Means of Verification	Pre-Harvest Environmental/Social Assessment Form, BMP Field Guide, Field Visits

Evidence Reviewed	Pre-Harvest Environmental/Social Assessment Form, BMP Field Guide, interviews		
Risk Rating	☒ Low Risk	☐ Specified Risk	☐ Unspecified Risk at RA

	Indicator
2.2.3	The Biomass Producer has implemented appropriate control systems and procedures to ensure that key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).
Finding	Seaway Timber Harvesting has a Pre-Harvest Environmental/Social Assessment Policy and Form that they complete for all feedstock sourced to Curran Renewable Energy. This form ensures that Management practices maintain or enhance plant species composition, distribution and frequency of occurrence similar to those that would naturally occur on the site. Prior to a harvest, on properties that have not had a Historical Preservation or Natural Heritage Check conducted in the last 3 years, NYS Historical and NYS Natural Heritage checks will be performed to look for historical sites, archeo sensitive areas, rare, threatened, or endangered plants and animals and/or their habitats, common or rare plant communities and their habitat and unique or exemplary natural communities. If such areas are found special actions will be taken as-not-to disturb these areas and management will occur with the assumption that this species is present. Modifications in management will be made in order to maintain, restore or enhance the extent, quality and viability of the species and their habitats. Buffer areas will be established for RTE species where they are necessary to maintain or improve the short and long-term viability of the species. Conservation measures will be based on relevant science, guidelines and/or consultation with relevant, independent experts as necessary to achieve the conservation goal. Within the capacity of the forest owner, hunting, fishing, trapping, collecting and other activities will be controlled to avoid the risk of impacts to vulnerable species and communities. This policy also ensures that Best Management Practices are being followed. Seaway Timber Harvesting is the only supplier to Curran Renewable Energy. One of the company owners is onsite daily at every harvesting site to ensure these procedures are in place.
Means of Verification	Pre-Harvest Environmental/Social Assessment Form, BMP Field Guide, Field Visits
Evidence Reviewed	Pre-Harvest Environmental/Social Assessment Form, BMP Field Guide, interviews
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.2.4	The Biomass Producer has implemented appropriate control systems and procedures to ensure that biodiversity is protected (CPET S5b).
Finding	Seaway Timber Harvesting has a Pre-Harvest Environmental/Social Assessment Policy and Form that they complete for all feedstock sourced to Curran Renewable Energy. This form ensures that Management practices maintain or enhance plant species composition, distribution and frequency of occurrence similar to those that would naturally occur on the site. Prior to a harvest, on properties that have not had a Historical Preservation or Natural

	Heritage Check conducted in the last 3 years, NYS Historical and NYS Natural Heritage checks will be performed to look for historical sites, archeo sensitive areas, rare, threatened, or endangered plants and animals and/or their habitats, common or rare plant communities and their habitat and unique or exemplary natural communities. If such areas are found special actions will be taken as-not-to disturb these areas and management will occur with the assumption that this species is present. Modifications in management will be made in order to maintain, restore or enhance the extent, quality and viability of the species and their habitats. Buffer areas will be established for RTE species where they are necessary to maintain or improve the short and long-term viability of the species. Conservation measures will be based on relevant science, guidelines and/or consultation with relevant, independent experts as necessary to achieve the conservation goal. Within the capacity of the forest owner, hunting, fishing, trapping, collecting and other activities will be controlled to avoid the risk of impacts to vulnerable species and communities. This policy also ensures that Best Management Practices are being followed. Seaway Timber Harvesting is the only supplier to Curran Renewable Energy. One of the company owners is onsite daily at every harvesting site to ensure these procedures are in place.
Means of Verification	Pre-Harvest Environmental/Social Assessment Form, BMP Field Guide, Field Visits
Evidence Reviewed	Pre-Harvest Environmental/Social Assessment Form, BMP Field Guide, interviews
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.2.5	The Biomass Producer has implemented appropriate control systems and procedures for verifying that the process of residue removal minimises harm to ecosystems.
Finding	Seaway Timber Harvesting has a Pre-Harvest Environmental/Social Assessment Policy and Form that they complete for all feedstock sourced to Curran Renewable Energy. This form ensure that forest management operations do not have significant long term negative impacts on the forest services and resources. Management approaches and field prescriptions are developed and implemented to avoid or minimize negative short-term and long-term impacts and to maintain or enhance the long term viability of the forest.
Means of Verification	Pre-Harvest Environmental/Social Assessment Form, BMP Field Guide, Field Visits
Evidence Reviewed	Pre-Harvest Environmental/Social Assessment Form, BMP Field Guide, interviews
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.2.6	The Biomass Producer has implemented appropriate control systems and procedures to verify that negative impacts on ground water, surface water and water downstream from forest management are minimised (CPET S5b).

Finding	Seaway Timber Harvesting has a Pre-Harvest Environmental/Social Assessment Policy and Form that they complete for all feedstock sourced to Curran Renewable Energy. This form ensures that Management practices maintain or enhance plant species composition, distribution and frequency of occurrence similar to those that would naturally occur on the site. When activities are taking place in or near riparian areas proper buffers will be employed to provide as much protection as possible. When monitoring a management activity, the condition of protected areas, set-asides and buffer zones should be evaluated. This policy also ensures that Best Management Practices are being followed. Seaway Timber Harvesting is the only supplier to Curran Renewable Energy. One of the company owners is onsite daily at every harvesting site to ensure these procedures are in place.
Means of Verification	Pre-Harvest Environmental/Social Assessment Form, BMP Field Guide, Field Visits
Evidence Reviewed	Pre-Harvest Environmental/Social Assessment Form, BMP Field Guide, interviews
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.2.7	The Biomass Producer has implemented appropriate control systems and procedures for verifying that air quality is not adversely affected by forest management activities.
Finding	Seaway Timber Harvesting has a Pre-Harvest Environmental/Social Assessment Policy and Form that they complete for all feedstock sourced to Curran Renewable Energy. This form ensures that air quality is not impacted by the forest management operation.
Means of Verification	Pre-Harvest Environmental/Social Assessment Form, BMP Field Guide, Field Visits
Evidence Reviewed	Pre-Harvest Environmental/Social Assessment Form, BMP Field Guide, interviews
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.2.8	The Biomass Producer has implemented appropriate control systems and procedures for verifying that there is controlled and appropriate use of chemicals, and that Integrated Pest Management (IPM) is implemented wherever possible in forest management activities (CPET S5c).
Finding	No herbicides or pesticides are used as part of the harvesting operation by Seaway Timber Harvesting, Inc or Curran Renewable Energy, LLC.
Means of Verification	Field visits, contracts
Evidence Reviewed	Interviews, contracts

Risk Rating	☒ Low Risk	☐ Specified Risk	☐ Unspecified Risk at RA
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	Indicator
2.2.9	The Biomass Producer has implemented appropriate control systems and procedures for verifying that methods of waste disposal minimise negative impacts on forest ecosystems (CPET S5d).
Finding	Seaway Timber Harvesting has a Pre-Harvest Environmental/Social Assessment Policy and Form that they complete for all feedstock sourced to Curran Renewable Energy. This policy states that all trash generated on the logging jobs will be disposed of at the appropriate location off-site. This includes but is not limited to grease cartridges, oil pails, rags, hoses and other replaced parts, used oil, etc.
Means of Verification	Field visits
Evidence Reviewed	interviews
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.3.1	Analysis shows that feedstock harvesting does not exceed the long-term production capacity of the forest, avoids significant negative impacts on forest productivity and ensures long-term economic viability. Harvest levels are justified by inventory and growth data.
Finding	Seaway Timber Harvesting has a Pre-Harvest Environmental/Social Assessment Policy and Form that they complete for all feedstock sourced to Curran Renewable Energy. This form ensure that forest management operations do not have significant long term negative impacts on the forest services and resources. Management approaches and field prescriptions are developed and implemented to avoid or minimize negative short-term and long-term impacts and to maintain or enhance the long term viability of the forest. Most of the harvesting conducted to supply Curran Renewable Energy with feedstock is conducted with a forester following a forest management plan. In these sales the trees are either marked designating trees to be removed or left or a written prescription is given to the harvester operator. Foresters monitor sales at a minimum of once per week to ensure prescription and marking is being followed correctly.
Means of Verification	Pre-Harvest Environmental/Social Assessment Form, BMP Field Guide, Field Visits
Evidence Reviewed	Pre-Harvest Environmental/Social Assessment Form, BMP Field Guide, interviews
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.3.2	Adequate training is provided for all personnel, including employees and contractors (CPET S6d).
Finding	Curran Renewable Energy, LLC and Seaway Timber Harvesting, Inc conduct routine safety training to train employees in the use of safety equipment and are required to follow OSHA regulations. Seaway Timber Harvesting, Inc. employees are NY Logger Trained.
Means of Verification	Training records, Interviews
Evidence Reviewed	Training records, Interviews
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.3.3	Analysis shows that feedstock harvesting and biomass production positively contribute to the local economy, including employment.
Finding	Curran Renewable Energy employs 34 local employees and Seaway Timber Harvesting employs 61 local employees. All forest management operations are within 100 miles of the pellet mill which helps the local economy financially.
Means of Verification	Contracts, employment records
Evidence Reviewed	Contracts, employment records
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.4.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that the health, vitality and other services provided by forest ecosystems are maintained or improved (CPET S7a).
Finding	Seaway Timber Harvesting has a Pre-Harvest Environmental/Social Assessment Policy and Form that they complete for all feedstock sourced to Curran Renewable Energy. This form ensures that Management practices maintain or enhance plant species composition, distribution and frequency of occurrence similar to those that would naturally occur on the site. Prior to a harvest, on properties that have not had a Historical Preservation or Natural Heritage Check conducted in the last 3 years, NYS Historical and NYS Natural Heritage checks will be performed to look for historical sites, archeo sensitive areas, rare, threatened, or endangered plants and animals and/or their habitats, common or rare plant communities and their habitat and unique or exemplary natural communities. If such areas are found special actions will be taken as-not-to disturb these areas and management will occur with the assumption that this species is present. Modifications in management will

	be made in order to maintain, restore or enhance the extent, quality and viability of the species and their habitats. Buffer areas will be established for RTE species where they are necessary to maintain or improve the short and long-term viability of the species. Conservation measures will be based on relevant science, guidelines and/or consultation with relevant, independent experts as necessary to achieve the conservation goal. Within the capacity of the forest owner, hunting, fishing, trapping, collecting and other activities will be controlled to avoid the risk of impacts to vulnerable species and communities. This policy also ensures that Best Management Practices are being followed. Seaway Timber Harvesting is the only supplier to Curran Renewable Energy. One of the company owners is onsite daily at every harvesting site to ensure these procedures are in place.
Means of Verification	Pre-Harvest Environmental/Social Assessment Form, BMP Field Guide, Field Visits
Evidence Reviewed	Pre-Harvest Environmental/Social Assessment Form, BMP Field Guide, interviews
Risk Rating	☐ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.4.2	The Biomass Producer has implemented appropriate control systems and procedures for verifying that natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b).
Finding	Seaway Timber Harvesting, Inc. field personnel will report any unusual insect or disease infestation or forest fire to the owners of the property and related experts to monitor and develop a response if necessary. When an invasive or exotic species is found on a property the landowners and/or forester will be notified.
Means of Verification	Insect, Disease & Invasive Species Management and Strategies, field visits
Evidence Reviewed	Insect, Disease & Invasive Species Management and Strategies, interviews
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.4.3	The Biomass Producer has implemented appropriate control systems and procedures for verifying that there is adequate protection of the forest from unauthorised activities, such as illegal logging, mining and encroachment (CPETS7c).
Finding	Any trespass, illegal or unauthorized activities will be reported to the landowner and/or forester.
Means of Verification	Pre-Harvest Environmental/Social Assessment Form, Field Visits

Evidence Reviewed	Pre-Harvest Environmental/Social Assessment Form, interviews
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.5.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that legal, customary and traditional tenure and use rights of indigenous people and local communities related to the forest are identified, documented and respected (CPET S9).
Finding	Prior accepting material from a new logging site, Curran Renewable Energy will conduct a regional database search will be conducted for current, historical or traditional cultural, archeological, ecological, economic, indigenous or religious significance recorded in the area, using the NY State Historic Preservation Office GIS-Public Access http://www.oprhp.state.ny.us. If the results are positive for historical, cultural or indigenous sites, the item and location will be identified and noted on the forest type map. Curran Renewable Energy will work with Seaway Timber Harvesting to ensure that the location is identified and will be buffered and protected. The opportunity to jointly monitor sites of cultural significance is offered to tribal representatives. If disputes arise regarding tenure claims or use rights then Curran Renewable Energy, LLC and the landowner will attempt to resolve them through open communication, negotiation, and/or mediation. Any disputes will be documented.
Means of Verification	Historical, Cultural or Indigenous Site Survey Policy, Field Visits
Evidence Reviewed	Historical, Cultural or Indigenous Site Survey Policy, Interviews
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.5.2	The Biomass Producer has implemented appropriate control systems and procedures for verifying that production of feedstock does not endanger food, water supply or subsistence means of communities, where the use of this specific feedstock or water is essential for the fulfilment of basic needs.
Finding	Prior accepting material from a new logging site, Curran Renewable Energy will conduct a regional database search will be conducted for current, historical or traditional cultural, archeological, ecological, economic, indigenous or religious significance recorded in the area, using the NY State Historic Preservation Office GIS-Public Access http://www.oprhp.state.ny.us. If the results are positive for historical, cultural or indigenous sites, the item and location will be identified and noted on the forest type map. Curran Renewable Energy will work

	with Seaway Timber Harvesting to ensure that the location is identified and will be buffered and protected. The opportunity to jointly monitor sites of cultural significance is offered to tribal representatives. If disputes arise regarding tenure claims or use rights then Curran Renewable Energy, LLC and the landowner will attempt to resolve them through open communication, negotiation, and/or mediation. Any disputes will be documented.
Means of Verification	Historical, Cultural or Indigenous Site Survey Policy, Field Visits
Evidence Reviewed	Historical, Cultural or Indigenous Site Survey Policy, Interviews
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.6.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that appropriate mechanisms are in place for resolving grievances and disputes, including those relating to tenure and use rights, to forest management practices and to work conditions.
Finding	When a complaint is reported to Curran Renewable Energy, LLC about one of their suppliers or material that is being sourced through the Risk Assessment, they will contact the complainant within two weeks of receiving the complaint to determine if the situation is relevant to their operation. A determination of whether the complaint is credible will also be made. If the claim is credible and substantial the Rainforest Alliance will be notified at this time. A field verification will be performed within two months of the receipt of the complaint if the complaint is deemed credible. If disputes arise regarding tenure claims or use rights then Curran Renewable Energy, LLC and the landowner will attempt to resolve them through open communication, negotiation, and/or mediation. Any disputes will be documented. Records of all complaints received and the actions taken will be retained.
Means of Verification	Dispute Resolution Policy, Interviews
Evidence Reviewed	Dispute Resolution Policy, Interviews
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.7.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that Freedom of Association and the effective recognition of the right to collective bargaining are respected.

Finding	Curran Renewable Energy and Seaway Timber Harvesting employees are not in a Union.
Means of Verification	Interviews
Evidence Reviewed	Interviews
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.7.2	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not supplied using any form of compulsory labour.
Finding	All staff for Curran Renewable Energy and Seaway Timber Harvesting are employees of the companies and are not compulsory labour.
Means of Verification	Interviews with staff, payroll records
Evidence Reviewed	Interviews with staff, payroll records
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.7.3	The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is not supplied using child labour.
Finding	Child labor laws have been found to be violated in many different countries around the world. None of these violations have been specifically related to the United States or Canada on a remarkable scale. Stricter laws for child employment exist on the state level specifically for New York State than exist on the Federal level. In Canada the forest employment is regulated under the federal and provincial labor codes. These codes prohibit child labor and protect the rights of workers. Where youths are employed their employers must take special care in assuring that the workplace is safe and healthy. The hours that a youth is able to work in a day are also heavily restricted.
Means of Verification	https://www.labor.ny.gov/workerprotection/laborstandards/workprot/nyvsfed.shtm searched for Child Labor Laws in New York and found a comparison between New York State and Federal Child Labor Laws. http://www.naalc.org/migrant/english/pdf/mgcanchl_en.pdf searched for child labor laws in Canada. http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm and interviews with staff
Evidence Reviewed	https://www.labor.ny.gov/workerprotection/laborstandards/workprot/nyvsfed.shtm searched for Child Labor Laws in New York and found a comparison between New York State and Federal Child Labor Laws. http://www.naalc.org/migrant/english/pdf/mgcanchl_en.pdf searched for child labor laws in

	Canada. http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm and interviews with staff
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.7.4	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not supplied using labour which is discriminated against in respect of employment and occupation.
Finding	The United States ratified ILO Convention 100 in 1951 to ensure equal pay not to discriminate based on gender.
Means of Verification	http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100_INSTRUMENT_ID:312245:NO , interviews, payroll records
Evidence Reviewed	http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100_INSTRUMENT_ID:312245:NO , interviews, payroll records
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.7.5	The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is supplied using labour where the pay and employment conditions are fair and meet, or exceed, minimum requirements.
Finding	Child labor laws have been found to be violated in many different countries around the world. None of these violations have been specifically related to the United States or Canada on a remarkable scale. Stricter laws for child employment exist on the state level specifically for New York State than exist on the Federal level. In Canada the forest employment is regulated under the federal and provincial labor codes. These codes prohibit child labor and protect the rights of workers. Where youths are employed their employers must take special care in assuring that the workplace is safe and healthy. The hours that a youth is able to work in a day are also heavily restricted.
Means of Verification	https://www.labor.ny.gov/workerprotection/laborstandards/workprot/nyvsfed.shtm searched for Child Labor Laws in New York and found a comparison between New York State and Federal Child Labor Laws. http://www.naalc.org/migrant/english/pdf/mgcanchl_en.pdf searched for child labor laws in Canada. http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm and interviews with staff
Evidence Reviewed	https://www.labor.ny.gov/workerprotection/laborstandards/workprot/nyvsfed.shtm searched for Child Labor Laws in New York and found a comparison between New York State and Federal Child Labor Laws. http://www.naalc.org/migrant/english/pdf/mgcanchl_en.pdf searched for child labor laws in Canada. http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm and interviews with

	staff
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.8.1	The Biomass Producer has implemented appropriate control systems and procedures for verifying that appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12).
Finding	Federal OSHA Laws strictly regulate the use of safety or protective equipment. All forest workers and members of the logging crews or contractors are required to wear hardhats when at an active logging site. All forest workers and members of the logging crews or contractors are also required to attend safety and equipment training. All forest workers and members of the logging crews or contractors are routinely checked for the appropriate use of safety and harvesting/application equipment. Seaway Timber Harvesting, Inc. conducts routine safety training. Seaway timber Harvesting, Inc. employees are NY Logger Trained and follow OSHA regulations.
Means of Verification	https://www.osha.gov/ , http://www.newyorkloggertraining.org/ , interviews, training records
Evidence Reviewed	https://www.osha.gov/ , http://www.newyorkloggertraining.org/ , interviews, training records
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.9.1	Biomass is not sourced from areas that had high carbon stocks in January 2008 and no longer have those high carbon stocks.
Finding	The Northeastern portion of the United States is considered a carbon sink due to the large amount of forested area. Efforts in forestry to reduce atmospheric CO2 levels have focused on forest management and forest product use. Forest management strategies include land-use change to increase forest area (afforestation) and/or to avoid deforestation and optimizing carbon management in existing forests.
Means of Verification	http://nca2014.globalchange.gov/report/sectors/forests
Evidence Reviewed	http://nca2014.globalchange.gov/report/sectors/forests
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.9.2	Analysis demonstrates that feedstock harvesting does not diminish the capability of the forest to act as an effective sink or store of carbon over the long term.
Finding	Over 2/3 of New York's land is covered by forests and woodlands. Conservation easements have been purchased throughout the state to help prevent the development of some of the forested land. Within the Adirondack Park, the Adirondack Park Agency regulates development, development density and timber harvesting. Outside of the Adirondacks Park the Department of Environmental Conservation regulates timber harvesting. No forest management is conducted on forestland owned by New York State within the Adirondack Park as it is classified as Preserve Land and is Forever Wild. Within the Adirondack Park. The Natural Resource Conservation Service regulates the conversion of forestland to farmland of its participants.
Means of Verification	https://www.apa.ny.gov/Documents/Laws_Regs/APAACT.PDF https://apa.ny.gov/Documents/Guidelines/CitizensGuide.pdf https://www.fs.fed.us/ne/newtown_square/publications/brochures/pdfs/state_forests/ny_forest.pdf
Evidence Reviewed	https://www.apa.ny.gov/Documents/Laws_Regs/APAACT.PDF https://apa.ny.gov/Documents/Guidelines/CitizensGuide.pdf https://www.fs.fed.us/ne/newtown_square/publications/brochures/pdfs/state_forests/ny_forest.pdf
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA

	Indicator
2.10.1	Genetically modified trees are not used.
Finding	Genetically modified trees have no commercial use in forestry to date. In Canada a license and approval must be obtained from the federal government prior to any use. To date no licenses have been granted for the use of genetically modified trees to be used in wood products commercially. A few trials of genetically modified trees in Canada have been conducted none of which have been tested commercially. Most of the trials are currently being studied in the United States.
Means of Verification	Database http://www.fao.org/docrep/008/ae574e/ae574e00.htm searched for a review of genetically modified trees and http://www.fao.org/docrep/007/y5507e/y5507e14.htm searched for genetically modified trees. http://www.hort.net/lists/woodyplants/oct03/msg00000.html searched for genetically modified trees, Quebec Canada
Evidence Reviewed	Database http://www.fao.org/docrep/008/ae574e/ae574e00.htm searched for a review of genetically modified trees and http://www.fao.org/docrep/007/y5507e/y5507e14.htm searched for genetically modified trees. http://www.hort.net/lists/woodyplants/oct03/msg00000.html searched for genetically modified trees, Quebec Canada
Risk Rating	☒ Low Risk ☐ Specified Risk ☐ Unspecified Risk at RA