SBP

Sustainable Biomass Partnership

# Supply Base Report: Nahunta Pellets, LLC

www.sustainablebiomasspartnership.org

# Completed in accordance with the Supply Base Report Template Version 1.0

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

*Document history*

*Version 1.0: published 26 March 2015*

# Contents

# 1 Overview

Producer name: Nahunta Pellets, LLC

Producer location: 15333 Hwy 82, Nahunta, GA 31553

Geographic position: Lat W 81 degrees 57 minutes, Long N 31 degrees 12 minutes

Primary contact: Alex Farris

Company website: www.Epelletsgroup.com

Date report finalised: 13/Nov/2015

Close of last CB audit: Not applicable

Name of CB: Control Union

Translations from English: None

SBP Standard(s) used: Standard 1 v1.0
Standard 2 v1.0
Standard 4 v1.0
Standard 5 v1.0

Weblink to Standard(s) used: http://www.sustainablebiomasspartnership.org/documents

SBP Endorsed Regional Risk Assessment: Not applicable

Weblink to SBE on Company website: Not applicable

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

# 2 Description of the Supply Base

## 2.1 General description

Nahunta Pellets, LLC (NP) re-started its wood pellet production in March 2015 as its operations had been shut down in 2014. Since March feedstock usage has gradually increased monthly. The mill is currently at 90% of name plate capacity.

NP purchases primary and secondary feedstock from hundred eighteen (118) counties (15,324,665 hectares) in Alabama (3 counties), Georgia (78 counties) and Florida (37 counties) within the United States. Forests are the predominant land use in this supply base (67%). Pine forests comprise the largest forest type (49%) of the supply area's forest followed by hardwood forests (38%). The pine/oak forest comprises 10% of the supply area's forest type while about 3% of the forest is considered non-stocked. About 62% of the supply area's forests are managed as natural forests (6,419,069 hectares) while the remaining 38% of the supply area's forests are artificially regenerated (3,918,395 hectares).

NP purchases its primary feedstock in the form of roundwood and in-woods chips from primarily large landowners. Large landowners provide about 87% of the primary feedstock while small private landowners provide the remaining 13%. No primary feedstock originates from public lands.

The forest products industry is a very large part of the area's economy and is one of the top industries within both states generating $16.9 billion in GA, $14.5 billion in FL and $11.2 billion in AL annually. In GA there are 12 pulp/paper manufacturing facilities and 10 bioenergy facilities within the state. In FL there are 67 wood products facilities and 6 pulp/paper manufacturing facilities within the state.

As previously stated, pine forests dominate the majority of the forests within the supply area. Primary species for these pine forests include loblolly pine (*Pinus taeda*), slash pine (*Pinus ellitottii*) and longleaf pine (*Pinus palustris*). Small amounts of hardwood may be mixed with these primary pine species in primary feedstock derived from in-woods chips. No species purchased at the NP facility is listed on the CITES list. Longleaf pine was recently added to the IUCN Red List.

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

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

The vast majority of forests in the NP supply area are managed according to state forestry best management practices (BMPs). While these BMPs are normally voluntary, all NP suppliers are contractually required to abide by them. Supplier compliance with state BMPs is verified by periodic audits conducted by NP. NP's SFI Sourcing Procedures require all harvesting professionals to maintain continuing education training on BMPs and other sustainable forestry issues such as wildlife habitats and biodiversity and aesthetics. Overall BMP compliance reported for 2013 was 89.9% (GA) and 98.9% (FL) and 97% for AL in 2010.

Sustainable forestry certification is present in NP's supply with the company purchasing 50% of its primary feedstock as SFI certified. No Forest Stewardship Council (FSC) or American Tree Farm (ATF) certified fiber has been purchased to date.

NP purchases pine roundwood and in-woods chips as its primary feedstock from about two (2) wood suppliers. Secondary feedstock is received from eight (8) suppliers in the form of pine residual chips, pine sawdust and pine shavings. Pine roundwood and in-woods chips account for 34% of the total feedstock. Secondary feedstock accounts for 66% of the total feedstock.

## 2.2 Actions taken to promote certification amongst feedstock supplier

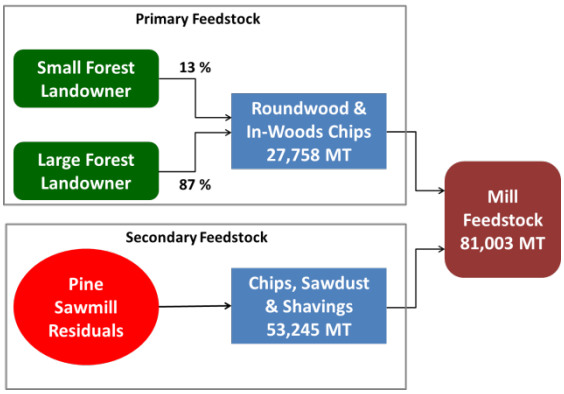
NP is certified to the FSC Chain of Custody and Controlled Wood Standards (BV-COC-124531/BV-COC-124531), PEFC Chain of Custody Standard (BV-PEFCCOC-US007673-1) and Green Gold Label Standards (C827692GGL01-01.2015). As part of NP's SFI Sourcing procedures, the company promotes certification (ATF, SFI, FSC) through various outreach programs. In addition NP requires logging operations to be conducted by loggers trained in accordance with the state training program as conducted by the SFI state implementation committee (SIC).

## 2.3 Final harvest sampling programme

NP through its SFI Sourcing procedures, samples at least 5% or a minimum of twelve (12) harvesting sites of all forest tracts from which its primary feedstock originates. This procedure is described in the company's NP-PROC-001 Fiber Sourcing Procedures. NP personnel document the type of harvest, location of harvest, BMP compliance, etc. on the NP-DOC-009 BMP Compliance Checklist to record this sample data.

Approximately 50% of NP's roundwood came from final fellings. The other 50% originated from thinnings. The typical rotation age of final fellings in the region is approximately 25 years.

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




## 2.5 Quantification of the Supply Base

### Supply Base

a. Total Supply Base area (ha): 15,324,665 ha

b. Tenure by type (ha): Privately owned (8,589,788 ha) / Public (1,747,675 ha)

c. Forest by type (ha): Temperate (10,337,463 ha)

d. Forest by management type (ha): Plantation (3,918,395 ha) / Managed Natural (6,119,360 ha) / Natural (299,709 ha)

e. Certified forest by scheme (ha): SFI (1,819,987 ha - total) (GA - 973,479 ha; FL - 826,508 ha; AL - 20,000 ha) / ATF (93,454 ha - total) (GA - 34,685 ha; FL - state-wide 35,748 ha; AL - 23,021 ha) / FSC (15,127 ha – total & GA only)

### Feedstock

f. Total volume of Feedstock: 81,002.89 tonnes

g. Volume of primary feedstock: 27,757.70 tonnes

h. List percentage of primary feedstock (g):

- Large forest holdings certified to an SBP-approved Forest Management Schemes 87%
- Large forest holdings not certified to an SBP-approved Forest Management Schemes 0%
- Small forest holdings certified to an SBP-approved Forest Management Schemes 0%
- Small forest holdings not certified to an SBP-approved Forest Management Schemes 13%

i. List all species in primary feedstock, including scientific name

**Primary Species:**

- Loblolly Pine *(Pinus taeda)*
- Longleaf Pine *(Pinus palustris)*
- Slash Pine *(Pinus elliottii)*

**Miscellaneous Species:**

- Pond Pine *(Pinus serotine)*
- American beech (*Fagus grandifolia*)
- Ash (*Fraxinus spp*)
- Basswood, American (*Tilia americana*)
- Black cherry (*Prunus serotina*)
- Black walnut (*Juglans nigra*)

- Blackgum (*Nyssa sylvatica*)
- Boxelder (*Acer negundo*)
- Buckeye (*Aesculus spp*)
- Eastern cottonwood (*Populus deltoides*)
- Elm (*Ulmus spp*)
- Hackberry (*Celtis occidentalis*)
- Hickory (*Carya spp*)
- Locust (*Robinia spp*)
- Maple (*Acer spp*)
- Oak (*Quercus spp*)
- Persimmon (*Diospyros virginiana*)
- Red maple (*Acer rubrum*)
- Red mulberry (*Morus rubra*)
- Red oak (*Quercus rubra)*
- River birch (*Betula nigra*)
- Sassafras (*Sassafras albidum*)
- Sourwood (*Oxydendrum arboreum*)
- Sugarberry (*Celtis laevigata*)
- Sweetgum (*Liquidambar styraciflua*)
- Sycamore (*latanus occidentalis*)
- Water oak (*Quercus nigra*)
- White oak (*Quercus alba*)
- Yellow-poplar (*Liriodendron tulipifera*)

j. Volume of primary feedstock from primary forest 0 tonnes

k. List percentage of primary feedstock from primary forest (i), by the following categories. Subdivide by SBP-approved Forest Management Schemes
   - Primary feedstock from primary forest certified to an SBP-approved Forest Management Schemes 0%
   - Primary feedstock from primary forest not certified to an SBP-approved Forest Management Schemes 0%

l. Volume of secondary feedstock:

| | |
|---|---|
| Pine chip mill chips | 50,060.49 tonnes |
| Pine sawdust | 2,015.96 tonnes |
| Pine shavings | 1,168.74 tonnes |

m. Volume of tertiary feedstock: 0 tonnes

# 3 Requirement for a Supply Base Evaluation

| SBE completed | SBE not completed |
|---|---|
| ☑ | ☐ |

SBE was completed so that all material can be SBP compliant in accordance with SBP Standard 4, 5.2.2.

# 4 Supply Base Evaluation

## 4.1 Scope

The scope of the supply base evaluation of Nahunta Pellets, LLC is to confirm all indicators of Principles 1 & 2 of SBP Framework Standard 1: Feedstock Compliance Standard are considered low risk within the defined supply base.

## 4.2 Justification

The evaluation assessed each of the indicators within Principles 1 & 2 of SBP Framework Standard 1: Feedstock Compliance to determine if there is a low risk associated with each indicator. This assessment reviewed applicable laws and regulations and forestry best management practices, analysed high conservation areas within the supply base for their rareness and level of protection and assessed the economic impact of the company's presence in the supply base.

This review and analysis was completed using stated laws and regulations, published forestry best management practices, recognized research and data from the USDA Forest Service and conservation organizations such as the World Wildlife Fund, NatureServe, state forestry and wildlife agencies and other noted experts.

## 4.3 Results of Risk Assessment

The results of the risk assessment indicate there is low risk to all indicators within Principles 1 & 2 of SBP Framework Standard 1: Feedstock Compliance. No additional supplier assessment programs were identified as needed.

## 4.4 Results of Supplier Verification Programme

The results of the risk assessment indicate there is low risk to all indicators within Principles 1 & 2 of SBP Framework Standard 1: Feedstock Compliance. Below is a summary of NP's verification program to ensure and document that all indicators remain low risk, or if any indicator is elevated to unspecified risk, this verification program will describe the measures to mitigate such risk.

a. The company's Primary and Secondary Feedstock Supply Agreements place the responsibility on fiber suppliers to ensure that fiber does not come from the five (5) unacceptable sources as stated in the FSC Control Wood Standard.
b. The company's Fiber Sourcing system (NP-PROC-001 Fiber Sourcing Procedures) requires the company to conduct field inspections of primary feedstock. The sample intensity of this monitoring system requires 5% of all harvest tracts or a total of twelve (12) tracts to be inspected annually. This monitoring program verifies the origin of the primary feedstock, BMP compliance, wood utilization,

biomass retention and the five unacceptable sources of FSC Controlled Wood. These compliance checks are recorded on NP-DOC-009 BMP Compliance Checklists.

c. The company's Fiber Sourcing system (NP-PROC-001 Fiber Sourcing Procedures) also requires primary feedstock suppliers and their loggers to maintain their SFI SIC trained logger status. As part of this SFI training, loggers receive training on high conversation value areas and the habitats/ecosystems these areas are located.
d. The company's NP-PROC-003 FSC Controlled Wood / PEFC Due Diligence Procedures also record if the harvest tract meets any of the five unacceptable sources of FSC Controlled Wood for primary feedstock (NP-DOC-009 BMP Compliance Checklist). These procedures also require company personnel to audit secondary feedstock suppliers annually (NP-DOC-015 Secondary Supplier Audit Checklist) to verify their supply base is within the company's district of origin, to determine if the supplier has had any BMP or regulatory violation and to determine if the supplier has received any wood from high conservation value areas.

## 4.5 Conclusion

Based on the results of the supply base evaluation there is low risk to all indicators within Principles 1 & 2 of SBP Framework Standard 1: Feedstock Compliance. This conclusion is based on the strong legal and regulatory system found within the supply base (NP-DOC-008 FSC Controlled Wood Risk Assessment / NP-DOC-008a PEFC Due Diligence Risk Assessment). Federal, state and local laws regulations are in place to address a wide range of indicators including, but not limited to, illegal harvesting, water quality, rare and endangered species, worker health and safety, labour rights and air quality. In addition to these laws and regulations, voluntary state forestry best management practices (BMPs) are in place to provide guidance to forest landowners and contractors on how to sustainably manage forests. The company has made these voluntary guidelines mandatory through contract language requiring the use of all BMPs.

Analysis using USDA Forest Service FIA data clearly shows the supply area's forests are growing more fiber and carbon stock than is being harvested. The company's supply base shows growth to harvest & mortality at a positive 1.14 for softwood. Carbon stocks in the supply base increased 1.54% from the end of 2007 to 2013. To further support these findings, volume growth in Georgia was 1.5 times greater than volume removal in 2013, with softwood growth being 1.3 times greater and hardwood growth 1.9 times greater. This data along with economic impact studies indicate this company is a key part of the area's economy providing employment opportunities at the manufacturing site as well as throughout the supply area.

# 5 Supply Base Evaluation Process

The Supply Base Evaluation was completed in partnership with Greener Options Inc., a sustainability consulting company specializing in sustainable forest certification, Biological Integrity LLC, a consulting company specializing in conservation and biodiversity assessments.

Gary Boyd, Greener Options, Inc. is a SAF Certified Forester, a Georgia Registered Forester and an ISO 14001 Environmental Management Lead Auditor. Mark Hughes Ph.D., Biological Integrity LLC, is an accomplished wildlife biologist who has published more than 10 scientific articles, books and monographs. He has developed more than thirty (30) risk assessments for forest products companies addressing sustainable forestry certification schemes such as the Forest Stewardship Council (FSC) and the Programme for the Endorsement of Forest Certification (PEFC).

The supply base was determined based on primary and secondary feedstock suppliers to ensure the complete geography of the supply area. USDA Forest Service data based on this established supply base was used to verify forest growth and harvest levels, forest ownership and overall forest composition (species, age, stand structure). Ecosystem and biodiversity data from WWF, GreenPeace, World Resources Institute (WRI), Conservation International (CI), NatureServe and the various state natural heritage programs from within the supply base was also reviewed to determine potential high conversation value (HCV) areas and the level of protection for these HCVs.

Forest management regimes for the supply base were determined from information gathered from local forestry professionals and contractors within the region. Regional economic and forest health information was gathered from state forestry agencies and forestry associations.

NP requires the use of best management practices (BMPs), adherence to all laws and regulations and harvesting professional training as part of its contract with feedstock suppliers. NP personnel use various field verification systems for its primary suppliers and its other secondary feedstocks. Primary feedstock suppliers are verified at the forest level through on-site harvest and BMP inspections conducted by NP personnel. Overall sample size for these inspections is a minimum of 5 percent of all tracts supplying wood or a minimum of 12 samples per year, whichever is greater. Secondary feedstock suppliers are visited at least annually to confirm their supply base and the species they purchase for their operations.

# 6 Stakeholder Consultation

A list of thirty five (35) local and regional stakeholders was identified for consultation. These stakeholders represent interests from local contractors and businesses, local governments, state forestry and wildlife agencies, conservation organizations such as the Nature Conservancy, state forestry associations, local forest landowner associations, US Forest Service and US Fish & Wildlife Service. No recognized indigenous peoples groups have been identified within the supply area.

A letter was sent to the identified stakeholders on 13 October 2015 and 3 November 2015 notifying them the intent of Nahunta Pellets, LLC to become SBP certified and asking for input on their thoughts on the company's business practices and their impact on sustainable forestry in their area. Feedback was requested during the certification process via letter, email and/or telephone. All feedback will be reviewed and responses will be provided.

## 6.1 Response to stakeholder comments

As of November 23, 2015 five (5) stakeholders have responded to the initial notification letter sent out on September 16, 2015. Stakeholder's comments are supportive of NP's presence in the region and endorse certification. These comments are summarized below.

Comment 1: **United States Department of the Interior**
**Fish and Wildlife Service**
**Strant Colwell – Coastal Georgia Supervisor**

Positive comments indicating bioenergy industry can be expanded in Georgia with threatening sustainability of forest resources. Suggested NP could have a positive impact on sustainable forestry by supporting management techniques that are "friendly" to the environment such as those to protect the gopher tortoise.

Response 1: Thanks for your comments. We are currently working with a company harvesting timber. This company is teaching us a great deal in the area of protecting gopher tortoises. They have GPS marked gopher tortoise burrows in the harvest site so that these gopher tortoises can be protected.

Comment 2: **Warnell School of Forestry and Natural Resources**
**University of Georgia**
**W. Dale Greene – Dean**

Without question you made forestry more sustainable in your area by providing another market for harvested wood. History clearly shows that more markets for wood in an area and the competition it fosters increases the incentives for forest landowners to keep their lands in productive forests rather than converting them into other land uses. I applaud you for your pursuit of additional third-party certification that will document the good things you continue to do for our environment with sustainable forestry each day.

We deeply appreciate having Nahunta Pellets, LLC as an industry partner in the state and applaud you for your approach to doing business and for being a partner every day in making sustainable forestry happen.

Response 2: We appreciate your letter of support. We value our relationship with the Warnell School of Forestry and Natural Resources.

Comment 3: **Brantley County Development Authority**
**Brantley County, GA**
**Richard Thornton, Ed.D. – Executive Director**

The timber industry provides a large number of direct and indirect jobs in our region, and Nahunta Pellets is a major employer in Brantley County. The jobs provided by Nahunta Pellets and the associated jobs such as logging and trucking are vital to helping Brantley County sustain a thriving work force with stable incomes. Most of Brantley County is covered in pine forests so sustainability is a major concern. By ensuring that its suppliers are following good forest management practices Nahunta Pellets puts into practice its concern for the sustainability of our forests so that forests are managed properly and are productive for many generations to come.

The citizens of Brantley County are keenly aware of the need to do business in an environmentally conscious way. Nahunta Pellets is a good corporate citizen, both environmentally and otherwise.

Response 3: We appreciate your letter of support.

Comment 4: **United States House of Representatives**
**First Congressional District, Georgia**
**Earl L. "Buddy" Carter**

Since 2012, Nahunta Pellets (NP) has been producing high quality, certified pellets that have been used as an alternative low-cost source of energy throughout Europe and North America. NP's 3rd Party Certification with the Sustainable Biomass Partnership Standard is the next step in developing alternative sources of energy and providing bioenergy wood pellets to consumers around the world. In addition, NP's influence plays a major role in forestry management practices in Georgia's First Congressional District, which increases sustainability in the forest industry throughout Southeast Georgia.

I congratulate NP for its continued success and dedication to sustainable forestry practices. I believe obtaining 3rd Party Certification to the Sustainable Biomass Partnership Standards is an important part of promoting bioenergy production and the use of alternative energy sources around the world.

Response 4: We appreciate your letter of support.

Comment 5: **Georgia Forestry Commission**
**Risher A. Willard - Forest Marketing & Utilization Chief**

On behalf of State Forester Robert Farris, I would like to thank you for your November 3, 20015, inquiry regarding your pellet mill's certification to the Sustainable Biomass Partnership Standards.

While I do not have any direct knowledge of your mill's "impact on sustainable forestry" as you describe in your letter, I do have some important information about forestry in Georgia that may be useful to you in your certification process.

Georgia's forests are being sustainably managed to meet the numerous needs of our state today – averaging over 40% annual growth over removals. In addition, Georgia's forest area has remained stable over the past fifty-years at about 24 million acres – the largest commercial forest in the U.S.

Georgia's forest industry provides $28.9 billion in total economic activity and provides jobs for 135,732 workers. The wood pellet industry in Georgia is an important contributor to the economy of our state. Georgia's wood pellet mill portfolio has grown from zero mills in 2007 to ten mills in 2015. The wood pellet industry provides new markets for small diameter trees and helps "keep working forests in forests".

Feedstocks for wood pellet mills are plentiful in Georgia. In addition to the state's standing forest inventory, nearly 350 million cubic feet of wood and bark by-products are produced annually at Georgia's primary forestry mills. Furthermore, over 9 million dry tons of logging residues are produced annually in the state.

These are just a few of the positive attributes that Georgia's forests provide to our citizens and our forest industry – including the wood pellet industry.

Response 5: We appreciate your letter of support and the positive information about forestry in Georgia. Those facts support some of the reasons we established our wood pellets here in Georgia.

# 7 Overview of Initial Assessment of Risk

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 | |
| 2.3.1 | | X | |
| 2.3.2 | | X | |
| 2.3.3 | | X | |

| Indicator | Initial Risk Rating | | |
|---|---|---|---|
| | Specified | Low | Unspecified |
| 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

Not applicable; all indicators of the initial risk assessment were determined to be low risk so no Supplier Verification Programme is required.

## 8.2 Site visits

Not applicable; all indicators were determined to be low risk.

## 8.3 Conclusions from the Supplier Verification Programme

Not applicable; all indicators of the initial risk assessment were determined to be low risk so no Supplier Verification Programme is required.

# 9 Mitigation Measures

## 9.1 Mitigation measures

Not applicable; all indicators of the initial risk assessment were determined to be low risk so no mitigation measures are required.

## 9.2 Monitoring and outcomes

Not applicable; all indicators of the initial risk assessment were determined to be low risk so no mitigation measures are required.

# 10 Detailed Findings for Indicators

Not applicable

# 11 Review of Report

## 11.1 Peer review

No peer review of this report has been completed by other stakeholders. Due to the recent development and approval of the SBP standards, no other stakeholders with sufficient knowledge and experience with SBP certification could be identified in a timely manner.

## 11.2 Public or additional reviews

No additional external review of this report has been completed by other stakeholders. Due to the recent development and approval of the SBP standards, no other stakeholders with sufficient knowledge and experience with SBP certification could be identified in a timely manner.

# 12 Approval of Report

| Approval of Supply Base Report by senior management | | | |
|---|---|---|---|
| Report Prepared by: | *Gary P. Boyd* | *Owner,<br>Greener Options Inc.* | *11/12/2015* |
| | **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: | *Alex Farris* | *Sustainability Director<br>E-Pellets LLC* | *11/12/2015* |
| | **Name** | **Title** | **Date** |
| Report approved by: | *Jerry Fortner* | *General Manager,<br>Nahunta Pellets LLC* | *11/12/2015* |
| | **Name** | **Title** | **Date** |
| Report approved by: | *Keith Hulbert* | *General Manager,<br>E-Pellets LLC* | *11/12/2015* |
| | **Name** | **Title** | **Date** |

# 13 Updates

## 13.1 Significant changes in the Supply Base

Not applicable; This is the certification audit report.

## 13.2 Effectiveness of previous mitigation measures

Not applicable; This is the certification audit report.

## 13.3 New risk ratings and mitigation measures

Not applicable; This is the certification audit report.

## 13.4 Actual values of feedstock over the previous 12 months

Not applicable; This is the certification audit report.

## 13.5 Projected values of feedstock over the next 12 months

Not applicable; This is the certification audit report.