

SBP

Sustainable Biomass Partnership

Supply Base Report Template for Biomass Producers

www.sustainablebiomasspartnership.org



Version 1.2 June 2016

NOTE:

This template, v1.2, is effective as of the date of publication, that is, 23 June 2016. Template v1.1 may still be used for those audits undertaken prior to 23 June 2016 and where the certificate is issued to Certificate Holders before 1 October 2016.

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

Document history

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Audit Version/Final/06apr2017

1 Overview

Producer name: Westervelt Renewable Energy, LLC
Producer location: 1400 Jack Warner Pkwy, N.E., Tuscaloosa, AL 35404 (office)
 6777 Highway 17 South, Aliceville, AL 35442 (production)
Geographic position: Latitude: 33° 4'24.28" N, Longitude: 88° 14'30.37" W
Primary contact: Mike Williams
 1400 Jack Warner Pkwy, N.E., Tuscaloosa, AL, 35404
 (P) 205-562-5670
 (F) 205-562-5310
 mwilliams@westervelt.com
Company website: <http://www.westerveltenergy.com>
Date report finalised: 01/Apr/2017 (second surveillance audit)
Close of last CB audit: 21/Apr/2016 (first surveillance audit)
Name of CB: NSF
Translations from English: As appropriate
SBP Standard(s) used: Standard #1 Version 1.0 March 2015
 Standard #2 Version 1.0 March 2015
 Standard #4 Version 1.0 March 2015
 Standard #5 Version 1.0 March 2015
Weblink to Standard(s) used: <http://www.sustainablebiomasspartnership.org/documents>
SBP Endorsed Regional Risk Assessment: Not applicable
Weblink to SBE on Company website: <http://www.westerveltenergy.com/sustainability>

Indicate how the current evaluation fits within the cycle of Supply Base Evaluations				
Main (Initial) Evaluation	First Surveillance	Second Surveillance	Third Surveillance	Fourth Surveillance
<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>

2 Description of the Supply Base

2.1 General description

Westervelt's wood pellet production facility is located in the Southeast U.S. in Pickens County near Aliceville, Alabama. The facility is less than ten miles from the Mississippi state line and is adjacent to the Tennessee-Tombigbee Waterway in an economically depressed rural area where forestry and agriculture (e.g. crops, cattle) are prevalent and are the primary sources of income. Much of the forest land in this area is privately owned. Known as the Black Belt Prairie Region, the area is characterized by weathered rolling plains containing various hardwood and mixed hardwood/pine forests. A map of the procurement region is included in the Supply Base Evaluation and Risk Assessment.

The Risk Assessment includes all territory within the boundaries of Alabama and Mississippi; however, the catchment area is significantly smaller and extends approximately 100 highway miles from the site. There are a limited number of facilities in the area utilizing similar materials as Westervelt Renewable Energy; the closest being a pulp mill located approximately 35 miles away.

The pulp mill purchases thinnings that are a minimum of 16 years old while Westervelt's first thinnings are typically in the 12-15 year old age range. As noted by the State of Alabama Forestry Commission during the initial Stakeholder Consultation process, the haul radius for the Westervelt plant has an unbalanced growth-to-drain ratio (more grown than is being consumed) that could result in stand mortality if this facility were not in operation.

Westervelt's harvesting activity for pellet production is similar to other industries in the region, although on a somewhat smaller scale than harvesting which occurs for sawmills, pulp & paper, and other forest industry uses. Westervelt provides an outlet for primary feedstock residues from forests and wood industry residues that would otherwise be difficult to accommodate in the area surrounding the facility.

To produce pellets Westervelt utilizes 100% softwood (including *pinus taeda*, *pinus elliotti*, *pinus echinata*, *pinus palustris*, and *pinus virginiana*) and does not accept any hardwood. The primary input is round wood from thinnings in addition to forest residuals (e.g. tops, limbs, non-merchantable wood) from final harvest tracts. The facility supplements this material with sawmill residues (e.g. chips, shavings, sawdust) and does not utilize any construction, demolition or post-consumer derived feedstock. Bark generated on-site is supplemented by third party fuel to dry the feedstock prior to pelletizing, and is sourced from sawmills and chip mills from a variety of wood species.

Westervelt does not utilize feedstock from any CITES species. It is recognized that longleaf pine (*Pinus palustris*), which is identified in the IUCN Redlist, is located within the procurement area and has the potential to be used (see Westervelt Renewable

Energy, LLC Statement on Longleaf Pine dated April 1, 2016). A list of commonly sourced species is contained in the full Supply Base Evaluation and Risk Assessment as an appendix.

The company utilizes contract logging crews, the majority of which work exclusively for Westervelt. The logging crews are responsible for harvesting and transportation of raw material to the facility, all of which is delivered by truck.

Westervelt is a large landowner in the region, however; only a portion of company wood is utilized at the facility and the remainder is purchased from third party landowners. Company owned wood originates from FSC and SFI certified forests, but only a portion of third party forest land carries some type of forest level certification.

Approximately 40%-59% of the feedstock inputs are from Certified Forests recognized by SBP as compliant feedstock; ~80%-100% of sawdust is from a certified forest; ~80%-100% of sawmill residues (not including sawdust) are from a certified forest; 100% of all feedstock inputs meet requirements for controlled wood; 100% of feedstocks are SBP Compliant; 0% of inputs are from non-compliant feedstock; 0% of inputs are primary feedstock from a primary forest; 0% of inputs are from tertiary wood. A Supply Base Evaluation and Risk Assessment originally conducted for the 2015 certification audit was reviewed in preparation for this surveillance audit.

Existing certifications applicable to the areas within the scope of the Supply Base Evaluation and Risk Assessment include: PEFC ST 2002:2013 Chain of Custody Forest Based Products; FSC Mixed and FSC Controlled Wood Chain of Custody; FSC-US Forest Management Standard (v1.0)*; Sustainable Forest Initiative Forest Management* and Fiber Sourcing (SFI 2015-2019); and SFI Chain of Custody Standard. These certifications help to ensure a Low Risk of sourcing controversial or uncontrolled wood fiber. The company's existing Standard Operating Procedures constitute Control/Mitigation Measures and contribute to the finding of Low Risk. All wood pellet outputs are classified as SBP-compliant Biomass.

* Applies to Westervelt owned lands and not to third party-owned lands.

2.2 Actions taken to promote certification amongst feedstock supplier

All Westervelt forest management holdings within Alabama and Mississippi are dual FSC and SFI Certified by an independent and accredited Certification Body. The SFI Fiber Sourcing Standard requires Westervelt to promote forest management certification across its wood and fiber supply base. Formal correspondence is sent to direct purchased stumpage landowners urging them to pursue forest certification on their lands. Additional correspondence is sent to indirect wood producers urging them to promote forest management certification with landowners that they source from.

Westervelt is an active member of SFI Implementation Committees that promote forest certification and provide technical information to landowners addressing water quality

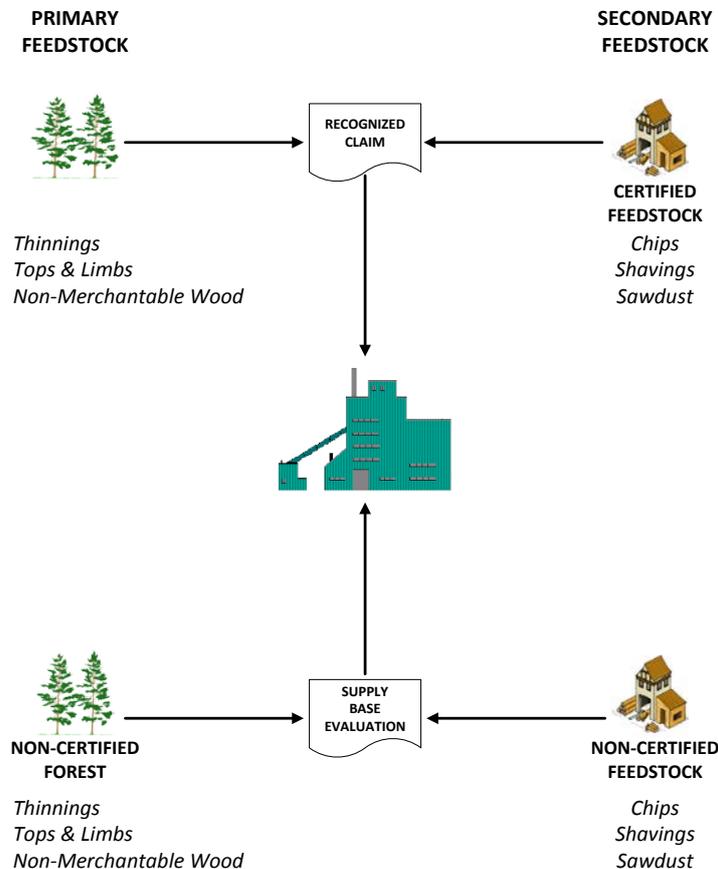
BMPs, reforestation, visual quality protection, efficient utilization, protection of wildlife and biodiversity, control of invasive species and the identification and protection of forests of exceptional conservation value.

2.3 Final harvest sampling programme

The expected rotation length for softwood in WRE’s catchment is <40 years which is below the Standard threshold (required only for final fellings) for a final harvest sampling program.

2.4 Flow diagram of feedstock inputs showing feedstock type

Westervelt utilizes 100% softwood and does not accept any hardwood. The primary materials are round wood from thinnings, forest residuals (low grade, storm salvage, tops and branches) from final harvest tracts, and industry residues (e.g. chips, shavings, sawdust). The facility does not utilize any construction, demolition or post-consumer derived feedstock.



2.5 Quantification of the Supply Base

Supply Base

- a. Total Supply Base area (ha): 8,012,775 ha MS
9,307,769 ha AL
- b. Tenure by type (ha): 560,894 ha Private Industrial MS
651,543 ha Private Industrial AL
6,490,347 ha Private Non-Industrial MS
8,097,759 ha Private Non-Industrial AL
961,533 ha (3.564mil ac) Public MS
558,466 ha (1.38mil ac) Public AL
- c. Forest by type (ha): 17,320,545 ha Temperate Forest
- d. Forest by management type (ha): 2,483,960 ha Planted MS
2,885,408 ha Planted AL
5,528,815 ha Managed Natural MS
6,422,361 ha Managed Natural AL
- e. Certified forest by scheme (ha): 768,902 ha ATFS MS
1,250,833 ha ATFS AL
195,851 ha FSC MS
226,207 ha FSC AL
779,232 ha SFI MS
1,169,488 ha SFI AL

Feedstock

- f. Total volume of feedstock: 400,000-600,000 green metric tons
- g. Volume of primary feedstock: 400,000-600,000 green metric tons
- h. List percentage of primary feedstock (g), by the following categories. Subdivide by SBP-approved Forest Management Schemes
 - Large forest holdings certified to an SBP-approved Forest Management Schemes 20%-39%
 - Large forest holdings not certified to an SBP-approved Forest Management Schemes 60%-79%
 - Small forest holdings certified to an SBP-approved Forest Management Schemes 0%-19%
 - Small forest holdings not certified to an SBP-approved Forest Management Schemes 60%-79%
- i. List all species in primary feedstock, including scientific name:

- Loblolly Pine (Pinus taeda)
- Shortleaf Pine (Pinus echinata)
- Slash Pine (Pinus elliotti)
- Virginia Pine (Pinus Virginiana)

- j. Volume of primary feedstock from primary forest: None
- 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%-19%
 - Primary feedstock from primary forest not certified to an SBP-approved Forest Management Schemes 0%-19%
- l. Volume of secondary feedstock: 0%-19% residues
- m. Volume of tertiary feedstock: 0%-19%

Justification for Banding

Feedstock purchases are commercially sensitive and disclosure of specific volumes places Westervelt at a competitive disadvantage when negotiating raw material contracts and can be materially harmful to our business operations.

3 Requirement for a Supply Base Evaluation

SBE completed	SBE not completed
X	<input type="checkbox"/>

Certified company owned forests and certified feedstocks from Westervelt’s sawmill represent less than 50% of the fiber purchased by the facility. Most of the non-company owned forests in the supply basin are not certified which dictates the need for a SBE. The SBE will serve to demonstrate the sustainability and legality of all fiber delivered to the facility.

4 Supply Base Evaluation

4.1 Scope

While the SBE & Risk Assessment includes all territory within the boundaries of Alabama and Mississippi, the catchment area is significantly smaller and extends approximately 100 highway miles from the site. There are a limited number of facilities in the area which utilize the same materials as Westervelt Renewable Energy, LLC.

4.2 Justification

The Supply Base Evaluation & Risk Assessment address each of the SBP Indicators as contained in Standard # 1. Westervelt did not attempt to modify or adapt the Indicators. Many of the Indicators are similar to the requirements contained in the SFI, FSC, and PEFC Standards. The evidence of conformance to the Indicators in Standard # 1 was drawn from existing Indicators and Evidence Manuals and Procedures to demonstrate conformance to the other certification standards, which SBP relies upon and does not attempt to duplicate.

Additional objective evidence of conformance was drawn from State BMP monitoring, forest inventory & analysis statistics, state-wide resource assessments, wildlife action plans and other publicly available sources of information.

The existing Documents and Procedures provide the bulk of the evidence contained in the Supply Base Evaluation and Risk Assessment.

4.3 Results of Risk Assessment

The Risk Assessment considered all of the Standard Operating Procedures (SOPs) previously implemented by Westervelt. The SOPs constitute existing control or mitigation measures approved and certified by independent Certification Bodies to meet the rigorous requirements of the FSC, SFI, and PEFC Standards. The finding of Low Risk of the Supply Base Evaluation & Risk Assessment is consistent with the findings of the FSC Controlled Wood and PEFC Due Diligence System & Risk Assessment.

4.4 Results of Supplier Verification Programme

By virtue of the finding of Low Risk to the SBP Standard # 1 Indicators, the Low Risk finding of the FSC Controlled Wood Risk Assessment and the Low Risk finding of the PEFC Due Diligence System & Risk Assessment; a Supplier Verification Program (SVP) was not necessary or required. Therefore, this Section is not applicable (NA).

4.5 Conclusion

The Supply Base Evaluation & Risk Assessment concluded Low Risk for all SBP Indicators based upon the Standard Operating Procedures (SOPs) of Westervelt. The Supply Base Evaluation drew on the more than 5 year history and record of conformance to Forest Management, Chain of Custody, and Controlled Wood and certifications from FSC, SFI, and PEFC.

The States of Mississippi and Alabama document high levels of BMP compliance and have strong legal and regulatory systems in place to ensure legality. Westervelt requires all of its loggers to be trained. All contracts with suppliers and landowners require compliance with laws and regulations as well as State Best Management Practices. Feedback from the Stakeholder Consultation process was positive and reinforced the finding that there is an overabundance of wood fiber in the age classes of trees utilized by the Westervelt facility. All inputs are currently from thinnings and residual waste material that would otherwise be left in the field, along with industry residual chips and sawdust from primary manufacturing facilities.

Approximately 40%-59% of the feedstocks are from Certified Forests, recognized as SBP-compliant Primary Feedstocks. All non-certified sources are Low Risk for all Standard # 1 Indicators. Thus, all inputs originating within the supply base are considered SBP-compliant Feedstocks.

5 Supply Base Evaluation Process

After evaluating the required competencies to achieve objectives of the SBE, Westervelt selected and appointed an evaluation team to develop the initial SBP Program and Procedures, including conducting the Supply Base Evaluation & Risk Assessment. Team members and their qualifications are:

Scott Berg

Berg, Principal at R.S. Berg & Associates, Inc., provided consulting assistance in developing the original Westervelt SFI Fiber Sourcing, SFI Forest Management, SFI Chain of Custody, PEFC Chain of Custody/Due Diligence Systems, FSC Forest Management Standard, and FSC Chain of Custody and Controlled Wood Standards Program. R.S. Berg & Associates, Inc. has provided consulting assistance to over two hundred and sixty (260) forestry organizations in North America and has conducted over forty (40) independent and internal audits to the FSC, SFI and American Tree Farm System Standards. Resume, Client List and other information is available at the following website: <http://www.rsbergassoc.com/>

Sam Hopkins

Hopkins is the (now retired) EMS/SFI/CPI Manager for the Natural Resources Division of the Westervelt Company and has 40 years of experience in forest inventory, scheduling, and research & development. He has a BS in Forestry from the University of the South (Sewanee) and a Masters of Forest Science from the Yale School of Forestry and

Environmental Studies. For the last ten years he was responsible for sustainable forestry certifications and environmental processes (EMS) at Westervelt. His primary focus was the company's certifications in SFI, FSC, PEFC forest and chain of custody standards.

Clint Woods

Woods is the Fiber Procurement Manager for Westervelt Renewable energy, LLC and Chain of Custody and Controlled Wood Coordinator for The Westervelt Company. He has a BS in Forest Management from Mississippi State University, is a Registered Forester, Professional Logging Manager, and is experienced in developing FSC Chain of Custody and Controlled Wood Procedures. He has 14 years of procurement experience in the Westervelt supply base area.

Mike Williams

Williams is Project Director, Business Development at The Westervelt Company. He has a BS from Morehead State University, completed the Advanced Management Program at Duke University, holds a Certificate of Process Mastery from Hammer & Company, and is a certified Six Sigma Black Belt. He has over 30 years of forest products industry experience with expertise in project development, strategy & planning, process management, procurement, quality systems & analysis, and supply chain logistics. He also has biomass project development experience, participated in the SBP working group during development of the standard, and is a member of the SBP Stakeholder Consultation Committee.

Jonathan Lowery

Lowery is Forest Sustainability & Policy Manager for the Forest Resources Division of the Westervelt Company and has over 15 years experience in forest inventory and scheduling. He has a BS in Forestry from Mississippi State and is a Registered Professional Forester. He is responsible for the company's certifications in SFI, FSC, PEFC forest management standards. While not part of the original team, Lowery replaced Sam Hopkins upon his retirement.

6 Stakeholder Consultation

The initial Stakeholder Consultation Procedure (WRE-SBP-DP-04) included correspondence to relevant stakeholders. A list of relevant Stakeholders was developed based upon several criteria including: the geographic scope of the Supply Base, stakeholders from past FSC/PEFC/SFI audits and consultations, relevant federal and state natural resource agencies, private conservation organizations, hunt clubs, indigenous peoples, universities, advocacy organizations, as well as local government officials. Approximately forty seven (47) letters were sent as of 12/15/2014. A Summary of Stakeholder input was prepared documenting input and responses by Westervelt.

It should be noted that the Westervelt Renewable Energy, LLC SBP Stakeholder Consultation was the first one to be conducted in the U.S. The SBP website contains a Draft of the

Standards, and because the Standards are not well known or understood in the U.S., Westervelt did not expect to receive a large number of comments or feedback, in spite of the fact that a large number of letters (47) were sent to potentially interested stakeholders.

Note: Additional stakeholder consultations were conducted by the CB and by SBP; Westervelt is unaware of results of the SBP-conducted consultation.

6.1 Response to stakeholder comments

WESTERVELT CONSULTATION

Public Comment #1:

“From a state agency stand point, The Westervelt Facility, is a positive step in the right direction to maintain and increase forest health in overcrowded pine stands that are contained within the haul radius of this facility. Wood utilization from thinning and residual logging residue helps maintain stand vigor, helps in fuel reduction for wildfires and reduces the possibility of insect infestations. Past FIA data has proven that the haul radius for this facility has an unbalanced growth to drain ratio that could result in stand mortality if this facility were not in operation. From a landowner’s view point, this facility gives hope to the private nonindustrial forest landowner that there is reason to plant and manage pine stands for future income. Without this hope these same landowners might find no economic reason to retain this land as forest thus increasing the possibility of forest fragmentation, the greatest threat to southern forest and clean water.”

Westervelt Response:

Westervelt takes no exception to this feedback.

Public Comment #2:

“Good afternoon. I was forwarded the information below regarding the assessment of your biomass feedstocks as a sustainable resource for the production of wood pellets for the overseas market. The 25x’25 Alliance (www.25x25.org) and the SAFER Alliance (<http://saferalliance1.wordpress.com/>) are very supportive of the use of biomass for bioenergy purposes – domestic or international. Can you please include me on future stakeholder outreach emails and correspondence? As an FYI, I have attached our 25x’25 Bioenergy Policy Principles and our Wood to Energy Initiative Talking Point documents for your review.”

Westervelt Response:

Westervelt takes no exception to this feedback. It should be noted that our initial request for comment was forwarded to Mr. Bailey by a person (name unknown) on our stakeholder contact list.

NSF FOLLOW-UP CONSULTATION:

Public Comment #1: Received January 23, 2015 from the same individual as Comment #2 above.

"We submitted no comments, thus we have no concerns of comments being addressed. All FYI for your audit."

NSF's Response:

Thank you for your response.

Public Comment #2: Received February 2, 2015 from the same individual as Comment #1 above.

"I have no reason to believe Westervelt's operation will be nothing but positive for the SBP. Westervelt is a leader in forest industry and especially in Alabama and in the Pickens County, AL. wood basket. This facility is needed in the area to relieve the oversupply of standing material. I provided them a growth to drain ratio derived from current FIA data that shows this overabundance for a 60 mile radius to include Mississippi. This mill will increase forest health for years to come. I know of no reason that would preclude them from being certified at this time."

NSF's Response:

Thank you for your response.

7 Overview of Initial Assessment of Risk

The results of the assessment indicated low risk for all indicators and is consistent with findings from the company’s third-party consultant and is also confirmed by findings from the company’s FSC risk assessment.

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	
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

The results of the Supply Base Evaluation and Risk Assessment addressing the requirements in Standard # 1 were all Low Risk. As such, no Supplier Verification Program (SVP) is necessary or required. Supplier verification is already underway as part of the Standard Operating Procedures (SOPs) that are implemented by Westervelt as part of its SFI, PEFC, and FSC sustainable forestry programs.

8.2 Site visits

Does not apply.

8.3 Conclusions from the Supplier Verification Programme

Does not apply.

9 Mitigation Measures

9.1 Mitigation measures

Westervelt's Standard Operating Procedures are designed to address potential areas of concern and are regularly reviewed for effectiveness. Internal and independent audits of our processes confirm that these institutionalized procedures are effective, and we have yet to identify areas of Specified or Unspecified Risk requiring standalone mitigation measures. Each indicator is reviewed annually to identify potential gaps and implement corrective measures.

9.2 Monitoring and outcomes

As explained in Section 5 above, Westervelt implements a comprehensive sampling and monitoring program. Westervelt documents the location of all tracts before harvesting takes place. The Section, Township, and Range is recorded for each tract including the tract name and contract number. Westervelt issues an ID Card and Tract Card for each load for company wood. Each delivered load has to have Card and contract. Westervelt staff audit a minimum of 10% of outside contract wood and 100% of internal wood. Westervelt staff also

verify by questionnaire, they check on BMPs, confirm that no conversion of forestland is taking place and address other monitoring items on its Harvest Inspection Report. A letter is sent to each Supplier after the operation is completed identifying any Corrective Actions and noting good practices.

10 Detailed Findings for Indicators

Detailed findings for each Indicator are given in Annex 1.

11 Review of Report

11.1 Peer review

A Readiness Review (for the initial certification audit) was conducted with the accredited Certification Body (NSF) and witnessed by a SBP representative. Over 45 letters were sent to potential stakeholders. The accredited Certification Body has assigned two auditors to conduct an independent audit of the SBP Program. The Certification Body was also required to conduct an independent consultation with potential stakeholders. Additionally, the Certification Body's assessment is subject to independent third-party review.

Independent auditors conduct annual surveillance audits of the Westervelt SFI, PEFC, and FSC certification programs. SBP intends to convene a Technical Review Panel to review the audit findings.

Westervelt believes that sufficient independent reviews of its Program and Procedures has taken place and that an additional Peer Review is not warranted or required.

11.2 Public or additional reviews

See the summary response to Section 11.1 above.

12 Approval of Report

INITIAL CERTIFICATION AUDIT REPORT

Approval of Supply Base Report by senior management			
Report Prepared by:	Mr. R. Scott Berg	President, R.S. Berg & Associates, Inc.	30 Jan 2015 (initial report)
<p>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.</p>			
Report approved by:	Ms. Alicia Cramer	President, Westervelt Renewable Energy, LLC	19 Feb 2015
Report approved by:	Mr. Steve Metz	Plant Manager Westervelt Renewable Energy, LLC	19 Feb 2015
Report approved by:	M. Mike Williams	Project Director, Business Development The Westervelt Company	19 Feb 2015
Report approved by:	Mr. Clint Woods	Procurement Manager Westervelt Renewable Energy, LLC	19 Feb 2015
Report approved by:	Mr. Sam Hopkins	EMS, SFI, CPI Manager, The Westervelt Company	19 Feb 2015

FIRST SURVEILLANCE AUDIT REPORT

Approval of Supply Base Report by senior management			
Report Prepared by:	Mr. R. Scott Berg	President, R.S. Berg & Associates, Inc.	30 Jan 2015 (initial report)
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:	Ms. Alicia Cramer	President, Westervelt Renewable Energy, LLC	15 Apr 2016
Report approved by:	Mr. Mike Williams	Project Director, Business Development The Westervelt Company	15 Apr 2016
Report approved by:	Mr. Clint Woods	Procurement Manager, Westervelt Renewable Energy, LLC	15 Apr 2016
Report approved by:	Mr. Jonathan Lowery	Forest Sustainability & Policy Manager, The Westervelt Company	15 Apr 2016

SECOND SURVEILLANCE AUDIT REPORT

Approval of Supply Base Report by senior management			
Report Prepared by:	Mr. R. Scott Berg	President, R.S. Berg & Associates, Inc.	30 Jan 2015 (initial report)
<p>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.</p>			
Report approved by:	Mr. Joe Patton	President, Westervelt Renewable Energy, LLC	9 Mar 2017
Report approved by:	Mr. Mike Williams	Project Director, Business Development The Westervelt Company	9 Mar 2017
Report approved by:	Mr. Clint Woods	Procurement Manager, Westervelt Renewable Energy, LLC	9 Mar 2017
Report approved by:	Mr. Jonathan Lowery	Forest Sustainability & Policy Manager, The Westervelt Company	9 Mar 2017

13 Updates

13.1 Significant changes in the Supply Base

The boundaries of our previously identified supply base have not changed and are consistent with our initial Supply Base Evaluation. Within the supply base we reviewed multiple evidence sources to ensure that changes did not occur, including but not limited to, BMP compliance, HCV areas, land use conversion, traditional & civil rights, illegal logging, and other controversial sources. The review included state and federal agency sources in addition to third party data sources from environmental and standards setting organizations. This was verified by our internal audit process in addition to a third party audit initiated by the company's Board of Directors.

13.2 Effectiveness of previous mitigation measures

As indicated in Section 9.1, Westervelt's Standard Operating Procedures are designed to address potential areas of concern and are regularly reviewed for effectiveness. Internal and independent audits of our processes confirm that these institutionalized procedures are effective, and we have yet to identify areas of Specified or Unspecified Risk requiring standalone mitigation measures. Each indicator is reviewed annually to identify potential gaps and implement corrective measures.

13.3 New risk ratings and mitigation measures

None identified.

13.4 Actual figures for feedstock over the previous 12 months

Total Volume of Feedstock: 400,000 – 600,000 metric tons
Primary Feedstock: 400,000 – 600,000 metric tons

13.5 Projected figures for feedstock over the next 12 months

Total Volume of Feedstock: 0 – 200,000 metric tons
Primary Feedstock: 0 – 200,000 metric tons