



Sustainable Biomass Partnership

# Supply Base Report: Westervelt Renewable Energy, LLC

First Surveillance Audit



## Completed in accordance with the Supply Base Report Template Version 1.2

### 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](http://www.sustainablebiomasspartnership.org)*

### *Document history*

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# 1 Overview

Producer name: Westervelt Renewable Energy, LLC

Producer location: 1400 Jack Warner Pkwy, N.E., Tuscaloosa, AL 35404

Geographic position: Lat N 33 degrees 4 minutes, Long W 88 degrees 14 minutes

Primary contact: Mike Williams, mwilliams@westervelt.com , 205-562-5670

Company website: www.westerveltenergy.com

Date report finalised: 18/Jun/2015

Close of last CB audit: 25/Apr/2015

Name of CB: NSF

Translations from English: As appropriate

SBP Standard(s) used: Standard 1  
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: <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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## 2 Description of the Supply Base

### 2.1 General description

Westervelt Renewable Energy's Aliceville wood pellet production plant (BP) is located in Pickens County in Southwest, Alabama, approximately five miles from the Mississippi state line. The facility is adjacent to the Tennessee-Tombigbee Waterway in a rural area where forestry and agriculture (e.g. crops, cattle) are prevalent and are the primary sources of income. Known as the Black Belt Prairie Region, the area is characterized by weathered rolling plains containing various hardwood and mixed hardwood/pine forests. Maps of the procurement areas are included in the Supply Base Evaluation (SBE) and Risk Assessment (RA) as an Appendix.

While the 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; 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.

To produce pellets Westervelt utilizes 100% softwood, primarily southern yellow pine, and does not accept any hardwood. The primary input is round wood from first thinnings along with forest residuals (e.g. tops, limbs, non-merchantable wood) from final harvest tracts. Additionally, the plant supplements this material with sawmill residues (e.g. chips, shavings, sawdust) and chips. The facility does not utilize any construction, demolition or post-consumer derived feedstock.

The plant utilizes on-site generated bark which is supplemented by external fuel to dry the southern yellow pine feedstock prior to pelletizing. The external bark is sourced from sawmills and chip mills and comes from a variety of wood species.

The company utilizes contract logging crews, the majority of which work exclusively for Westervelt. The logging crews are responsible for transporting raw material to the facility via truck. Sawmill residues are also delivered to the facility 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 external land owners. All company owned wood originates from FSC and SFI certified land, but only a portion of external land carries some type of certification. Approximately 40%-45% of the inputs are traceable back to a Certified Forest as recognized by the SBP as

compliant feedstock, and this figure will vary throughout the year. A Supply Base Evaluation and Risk Assessment was conducted over the entire wood supply area.

Existing certifications 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. Thus, all wood pellet outputs are considered SBP-compliant Biomass.

Westervelt does not utilize feedstock from any CITES species within the procurement region. Longleaf pine, 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.

## 2.2 Actions taken to promote certification amongst feedstock supplier

All of the Westervelt forest management holdings are both FSC and SFI Certified by an independent and accredited Certification Body (NSF). 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 the SFI Implementation Committees that promote forest certification and provides 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

Westervelt conducts Harvest Inspections on all purchased stumpage contracts and fee land stumpage to ensure that BMPs are implemented, the loggers have been trained under the SFI Logger Training Programs and are also trained to ensure regulatory compliance. The company also conducts sampling of contract wood for compliance. Corrective Action is documented on the Inspection Forms. The results of the monitoring program are reviewed and reported to management as part of the annual management review program.

## 2.4 Flow diagram of feedstock inputs showing feedstock type

Westervelt utilizes 100% softwood, primarily southern yellow pine, and does not accept any hardwood. The primary input is round wood from first thinnings along with forest residuals (non-merchantable wood) from final harvest tracts. Additionally, the plant supplements this material with sawmill residues (e.g. chips, shavings, sawdust) and chips. 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 Mississippi  
9,307,769 ha Alabama
- b. Tenure by type (ha): 560,894 ha Private Industrial Mississippi  
651,543 ha Private Industrial Alabama  
6,490,347 ha Private Non-Industrial Mississippi  
8,097,759 ha Private Non-Industrial Alabama  
961,533 ha (3.564mil ac) Public Mississippi  
558,466 ha (1.38mil ac) Public Alabama
- c. Forest by type (ha): 17,320,545 ha Temperate Forest
- d. Forest by management type (ha): 2,483,960 ha Planted Mississippi  
2,885,408 ha Planted Alabama  
5,528,815 ha Managed Natural Mississippi  
6,422,361 ha Managed Natural Alabama
- e. Certified forest by scheme (ha): 768,902 ha ATFS Mississippi  
1,250,833 ha ATFS Alabama  
195,851 ha FSC Mississippi  
226,207 ha FSC Alabama  
779,232 ha SFI Mississippi  
1,169,488 ha SFI Alabama

### Feedstock

- f. Total volume of feedstock: 400,000-600,000 metric tons
- g. Volume of primary feedstock: 400,000-600,000 metric tons
- h. List percentage of primary feedstock (g):
 

Large forest holdings certified to an SBP-approved Forest Management Schemes	40%-59%
Large forest holdings not certified to an SBP-approved Forest Management Schemes	0%-19%
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	40%-59%
- i. List all species in primary feedstock, including scientific name:



- Loblolly Pine (Pinus taeda)
  - Longleaf Pine (Pinus palustris)
  - Shortleaf Pine (Pinus echinata)
  - Slash Pine (Pinus elliotti)
  - Virginia Pine (Pinus Virginiana)
- j. Volume of primary feedstock from primary forest: 400,000-600,000 metric tons
- k. List percentage of primary feedstock from primary forest (i):
- 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% SFI certified residual chips  
0%-19% non-certified chips
- m. Volume of tertiary feedstock: Not applicable

#### **Justification for Banding**

It is the policy of Westervelt Renewable Energy to maintain strict data confidentiality for its raw material supply chain. We recognize the need to disclose certain information ("commercially sensitive information") to qualified third parties during the performance of audits to allow for verification of raw material types, sources, volumes and other relevant information necessary to demonstrate compliance with third-party standards. Westervelt's release of commercially sensitive information is covered by confidentiality and/or non-disclosure clauses which prohibit the information from being released publicly without written permission.

Public disclosure of commercially sensitive information places Westervelt at a competitive disadvantage and can be materially harmful to our business operations. When combined with commercially available data from non-Westervelt sources it would be possible to reverse engineer the supply chain and determine raw material & operational costs, specific sources of wood fiber supply, and would place us at a competitive and economic disadvantage in our dealings with subcontractors, suppliers, and customers. Furthermore, existing or potential competitors' use of this information could be detrimental to our commercial operations.

### 3 Requirement for a Supply Base Evaluation

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

*Approximately 45%-50% of the inputs are traceable back to a Certified Forest as recognized by the SBP as compliant feedstock. A Supply Base Evaluation (SBE) and Risk Assessment has been conducted encompassing the entire wood supply area.*

## 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, statewide 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 that are used by the Westervelt facility. All inputs are currently from thinnings and residual waste material that would otherwise be left in the field. A de minimis quantity (<2%) is from residual chips from primary manufacturing facilities.

Approximately 45% 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 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 recently retired EMS/SFI/CPI Manager for the Natural Resources Division of the Westervelt Company and has 40 years 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 13 years of procurement experience in the Westervelt supply base area.

### **Mike Williams**

Williams is Project Director in the Business Development group 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 and participated in the SBP working group during development of the standard.

### **Jonathan Lowery**

Lowery is the Sustainability Manager for the Natural 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.

**Key Elements of Westervelt's Processes:**

Westervelt implements a comprehensive sampling and monitoring program. Westervelt documents the location of all tracts before harvesting takes place. The tract name and legal description of the tract (section, township, and range) is recorded for each tract. Westervelt issues an ID Card and Tract Card for each load for company wood. Each delivered load is required to have a 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, check on BMPs, and confirm that no conversion of forestland is taking place. A letter is sent to each wood supplier/producer that is audited identifying any Corrective Actions and noting good practices.

## 6 Stakeholder Consultation

The initial Stakeholder Consultation Procedure (WRE-SBP-DP-04) included correspondence to interested 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.

### 6.1 Response to stakeholder comments

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](http://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.applicable.



## 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

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

Not applicable.

### 8.3 Conclusions from the Supplier Verification Programme

Not applicable.

## 9 Mitigation Measures

### 9.1 Mitigation measures

Westervelt Standard Operating Procedures (SOPs) addressing sustainability and legality are already in place and have been functioning for many years under the organization's SFI, PEFC, and FSC certification programs. Because the SOPs are already in place and functioning, and are already independently certified, there are no Specified Risks and there is no need for additional Mitigation Measures. What are referred to as Mitigation Measures in SBP are contained and have been institutionalized in the SOPs and are itemized in the full Supply Base Evaluation & Risk Assessment.

### 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 I

## 11 Review of Report

### 11.1 Peer review

The SBP Standards Program at Westervelt has involved the development of detailed Documents and Procedures to address all relevant requirements. An outside consultant was retained to help develop the procedures and conduct the Supply Base Evaluation.

A Readiness Review was conducted with the accredited Certification Body (NSF) and was 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

Approval of Supply Base Report by senior management			
Report Prepared by:	R. Scott Berg	President, R.S. Berg & Associates, Inc.	30/Jan/2015
	<b>Name</b>	<b>Title</b>	<b>Date</b>
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	30/Jan/2015
	Mr. Steve Metz	Plant Manager, Westervelt Renewable Energy, LLC	30/Jan/2015
	Mr. Mike Williams	Project Director, Business Development, The Westervelt Company	30/Jan/2015
	Mr. Clint Woods	Procurement Manager, , Westervelt Renewable Energy, LLC	30/Jan/2015
	Mr. Sam Hopkins	EMS, SFI, CPI Manager, The Westervelt Company	30/Jan/2015
	<b>Name</b>	<b>Title</b>	<b>Date</b>

Approval of revised Supply Base Report by senior management			
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.			

<b>Report approved by:</b>	Ms. Alicia Cramer	President, Westervelt Renewable Energy, LLC	30/Jan/2015
	Mr. Mike Williams	Project Director, Business Development, The Westervelt Company	30/Jan/2015
	Mr. Clint Woods	Procurement Manager, , Westervelt Renewable Energy, LLC	30/Jan/2015
	Mr. Jonathan Lowery	Sustainability Manager, The Westervelt Company	30/Jan/2015
	<b>Name</b>	<b>Title</b>	<b>Date</b>

## 13 Updates

### 13.1 Significant changes in the Supply Base

Not applicable.

### 13.2 Effectiveness of previous mitigation measures

All previously identified mitigation measures were deemed to remain effective based on an internal document review and internal audit.

### 13.3 New risk ratings and mitigation measures

All previously identified mitigation measures were deemed to remain effective based on an internal document review and internal audit.

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

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

Primary Feedstock: 400,000 – 600,000 metric tons